

From: Stacey Wylie [REDACTED]
Sent: 14 June 2019 13:08
To: Planning Policy
Subject: Northampton Local Plan Part 2 Consultation
Attachments: 19-06-05 NBC Local Plan Pt 2.pdf

Dear Sir / Madam,

Please find attached a response on behalf of Northamptonshire County Council key services (Education, Libraries, Broadband) and on behalf of Northamptonshire Fire & Rescue Service in relation to the current consultation on the draft Northampton Local Plan Part 2 (Regulation 19). Other service areas may respond separately.

Please don't hesitate to contact me should you have any queries,

Regards
Stacey

Stacey Wylie
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Development, Infrastructure & Funding
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Northamptonshire County Council

Planning Policy
Northampton Borough Council
The Guildhall, St Giles Square
Northampton
NN1 1DE

Please ask for: Stacey Wylie
Tel: [REDACTED]
Our ref: NBC/LocalPlanPart2Draft/Cons
Your ref:
Date: 5TH June 2019

Dear Sir,

RE: Draft Northampton Local Plan Part 2 Consultation (Regulation 19)

Submission on behalf of Northamptonshire County Council key services (Education, Libraries, Superfast Broadband) and Northamptonshire Fire and Rescue Service

Introduction

Northamptonshire County Council's Development Infrastructure and Funding Team welcomes the opportunity to comment on the Draft Northampton Local Plan Part 2 (the Draft Plan) through the current Regulation 19 consultation, supporting the development of planning policy at the local level.

The County Council's Plan for 2016-2021 sets out the vision of 'Making Northamptonshire a great place to live and work'. Northamptonshire is the largest single growth area in England outside London, with a population of more than 700,000 and set to grow by 20% by 2025.

In addition, the County Council's 'Creating Sustainable Communities: Planning Obligations Framework and Guidance – January 2015' document sets out the adopted policy approach of the County Council to requesting and securing Section 106 obligations in respect of Education, Libraries, Fire and Rescue, and Superfast Broadband infrastructure (amongst other areas). The County Council recommends that all development proposed in the Draft Plan be underpinned by the guidance set out in this document (and future iterations) to ensure that sufficient infrastructure capacity can be provided across Northampton to meet the needs of planned for growth.



General Comments

1. The County Council welcomes the approach adopted by Northampton Borough Council (NBC) in preparing the Draft, which builds on the adopted West Northamptonshire Joint Core Strategy and positively supports the need for collaboration between local authorities and other partner organisations, to ensure that the 'duty to co-operate' obligation is met – particularly in relation to those areas of the borough allocated as Sustainable Urban Extensions (SUEs) and at other strategic housing sites including those in the Northampton Related Development Area (NRDA).
2. The Draft clearly establishes the national and local policy context in which it will operate; in particular the need for Local Plans to be positively prepared, to meet the tests of the National Planning Policy Framework and to align with other local plans and policies.
3. The County Council remains committed to working with NBC and partners at all stages of policy-shaping to support the development and implementation of planning policy. The County Council therefore welcomes opportunities to engage with NBC to discuss these matters, and in particular to guide the planning and development of new education facilities and infrastructure to meet the needs of proposed growth.

Education Infrastructure and Facilities

1. As the Local Education Authority for the county of Northamptonshire, the County Council has a statutory responsibility for ensuring the sufficiency of provision for all pupils of school age across Early Years, Primary, Secondary and Sixth-form Education.
2. It is the County Council's role to plan, commission and organise school places in a way that promotes the raising of standards, manages supply and demand, and creates a diverse infrastructure. The County Council's 'School Organisation Plan 2016-2021 – Local Places for Local Children' (SOP) provides the framework for meeting these objectives, providing accommodation for school places that is high quality, fit for purpose, provides value for money and ensures flexibility to respond to changes in need.
3. The SOP has recently been updated for the period 2018-2023, and its evidence base and strategic priorities, should at all stages inform the strategic direction for provision of Education Infrastructure across the county. '*Planning for Schools Development (2011)*' a joint policy document prepared by the Secretary of State for Education and Secretary of State for Communities and Local Government, sets out

the Government's commitments to planning and delivery of state-funded schools and should also be taken into account in supporting the implementation of the policies in the Draft Plan. In addition, '*Securing developer contributions for education (April 2019)*' sets out the best practice guidance for local authorities and developers when considering the impact of new housing on education infrastructure and firmly establishes Government's expectation that developer contributions are fundamental to contributing towards school places required as a direct result of new housing development.

4. New housing development creates additional demand for existing and new education provision. Across Northamptonshire 80,000 additional new homes are expected to be built by 2031. These are likely to lead to approximately 24,000 additional Primary aged pupils and 16,000 Secondary and Sixth Form pupils.
5. Since 2010, the County Council has invested £230m in the schools estate in Northamptonshire; its Capital Strategy 2018-23 identifies a further £360m of investment that is required to meet the anticipated demand for school places in the county and ensure that the County Council continues to meet its statutory obligations.

Specific Comments on the Draft Plan

6. It is noted that the Draft considers whether additional sites may need to be allocated to ensure that the overall strategic housing requirement for the borough (18,870) can be delivered up to 2029.
7. Collectively, it is inevitable that any additional allocations will place further pressures on existing infrastructure and as such it is expected that measures will need to be taken to address these.
8. The Draft is underpinned by the West Northamptonshire Infrastructure Delivery Plan, which identifies the strategic infrastructure requirements necessary to support planned growth. It will be necessary to review this regularly with partners to ensure that the most up to date information is available to inform development, and to take into account any changes to proposed implementation schedules, which may result in bringing forward or pushing back delivery of key schemes to meet demand.
9. This may be particularly relevant when considering Education and Libraries infrastructure, where a mixture of localised and strategic infrastructure projects may be required to support growth. As such, it is the opinion of the County Council that all major housing development (schemes of over 10 units) should be assessed on the basis of its impact on local Education and Libraries infrastructure, and developer obligations may be secured towards mitigating this where additional capacity is

deemed to be required. Residential developments of over 50 units (or 5,000sqm in the case of non-residential development) should also be assessed on the basis of the need for additional on-site Fire & Rescue infrastructure, for example fire hydrants, to ensure that new development can be adequately served in the event of a fire.

10. In addition, it should be recognised that small sites (10 units or less) may still have a cumulative impact on existing provision and capacity, as does the continued application of permitted development rights to convert commercial premises to residential uses, when considered in conjunction with other development in a locality, and whilst s106 developer contributions would not normally be secured from these schemes there should be a recognition that their impact may still need to be mitigated and provision made through Section 106 agreements.
11. The County Council welcomes inclusion of Policy 21 – Childcare Provision which seeks to ensure the sufficient supply of childcare, including for pupils of Early Years education age, is strategically managed. The background to the policy notes that whilst some areas indicate a current sufficiency of supply, this is likely to be impacted as housing delivery accelerates throughout the plan period. There is therefore likely to be a need for developer contributions to support the provision of additional capacity, particularly of free entitlement places, through Section 106 contributions. The text of Policy 21 should therefore be amended to recognise this.
12. Chapter 12 –Infrastructure: The Draft Plan clearly acknowledges the fundamental role that infrastructure delivery will play in meeting the housing and employment trajectories set out in the WNJCS. The Infrastructure required to serve the current and future needs of the Borough is set out in the Infrastructure Delivery Plan; this should be regularly reviewed to ensure it remains up to date and takes into account emerging priorities and opportunities, and to identify any potential challenges to delivery and put in place solutions to address these.
13. As a point of clarity, it is requested that wording in paragraph 211 is amended to state:

“Northamptonshire County Council is the Local Education Authority and is required to provide a sufficiency of school places to meet the needs of all ~~new developments~~ children of school age that are located within its legislative boundary. The County Council have a School Organisation Plan which covers a five year period and their current plan covers the period 2018~~6~~ to 2023~~4~~.”
14. Whilst the County Council welcomes the inclusion of Policy 32 – Infrastructure Delivery and Contributions, it is suggested that consideration be given to also including reference within the text to support the identification, allocation and delivery of additional sites which may be required, alongside financial contributions,

in order to deliver new schools across both Primary and Secondary levels, where required to do so in order to effectively mitigate the impact of new development and population growth, where these are not already identified within existing site allocations, for example in relation to delivery of the SUEs.

15. This will need to be achieved alongside the successful application of Community Infrastructure Levy (CIL) contributions where applicable, to ensure that sufficient provision can be brought forward – for example in the delivery of new secondary schools required to meet the needs of growth stemming from cumulative levels of new housing development planned across Northampton and within the NRDA. The County Council would welcome further engagement with the Borough Council on the apportionment and allocation of CIL to infrastructure projects to identify opportunities for delivering this additional capacity.
16. With regards to Libraries infrastructure and provision, it is noted that Library Infrastructure is identified (and protected) as an intrinsic element of cultural and social infrastructure in the West Northamptonshire Joint Core Strategy (Policy RC2 – Community Needs). The Draft Plan should however be more explicit in recognising the impact of major housing development on existing provision, and support the approach of the County Council in securing developer contributions, where appropriate, to help mitigate the impact of new housing, improving capacity and extending the range of services available in line with the County Council's priorities for the Library service
17. In relation to the provision of Superfast Broadband infrastructure, the Northamptonshire vision is for the county to be at the leading edge of the global digital economy. This requires new developments (both housing and commercial) to be directly served by high quality fibre networks. Access to a next generation network (speeds of >30mbs) will bring a multitude of opportunities, savings and benefits to the county. It also adds value to the development and attract occupiers. Maximising full-fibre coverage is clearly the goal. This objective is underpinned by Policy C1 – Changing Behaviour and Achieving Modal Shift of the WNJCS
18. Building further on this, the County Council is keen to encourage wider adoption of the approach, as recently outlined in the Government consultation document “New Build Developments: Delivering gigabit-capable connections (October 2018)”, which sets out proposals to require developers and operators to provide delivery of ‘full fibre’ connectivity to new build development. Whilst recognising that analysis of the consultation responses is still ongoing, the County Council recommends that NBC consider the proposals contained within the consultation document, and advocate that the aims of this approach be reflected in future iterations of the Draft. There should also be acknowledgement of the need to improve mobile connectivity in the borough including increased coverage of 4G and enabling 5G access. This will have implications in terms of development.

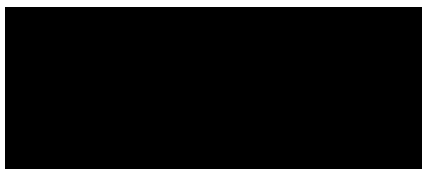
19. New developments and associated infrastructure within Northampton borough equates to an increase in visitors as well as traffic movements. This will inevitably lead to an increase in the spread of fire risk, which places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance.
20. Northamptonshire Fire and Rescue Service sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within its statutory responsibilities under the Fire and Rescue Services Act 2004.
21. Development coming forward during the Draft Plan period should be assessed to ensure that sufficient infrastructure is in place to accommodate the increased demand for services. This may result in a requirement for developer contributions to be secured, or for appropriate planning conditions to be applied to permissions granted, to ensure that adequate infrastructure is in place to enable fire, should it occur, to be effectively tackled.
22. In addition to highway improvements, provision may also be sought towards facilities enabling improved traffic and travel information in the Borough, sometimes as part of a travel plan, to help mitigate the impact of development. Even in areas where the car is the primary mode of travel, live information can help to promote the availability of alternative travel modes and reduce congestion by providing helpful journey information.
23. The County Council would also advocate inclusion within the Draft Plan of a policy to encourage and support the further use of electric vehicle charging points on new development sites, similar to the approach proposed in the recent South Northamptonshire Local Plan Part 2 consultation (Policy INF4). Such a policy would help to encourage modal shift away from standard modes of transport towards more sustainable methods and meet the rising demand for such provision as demonstrated through significant increase in sales of electric plug-in and low emission vehicles across the UK.

Concluding comments

24. The County Council welcomes the development of the Draft Northampton Local Plan Part 2 and remains committed to working with the Council and other partners in relation to the sustainable delivery of schools provision, including: the Education, Funding and Skills Agency, Free Schools, Academy Trusts, existing schools, education providers, developers and local communities.

25. Continued engagement is welcomed with Northampton Borough Council, particularly as the Draft is progressed and as the County Council's adopted Planning Obligations Framework and Guidance (2015) document is updated. This will ensure that current priorities and policies of the County Council and NBC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 and through the Community Infrastructure Levy, to effectively mitigate the impact of development across different types of infrastructure.
26. This collaborative approach will help to ensure that appropriate infrastructure is provided which will meet the demands of anticipated growth, creating new and expanded schools which will serve local children and be a focus for communities for the future.
27. I hope that the above comments are helpful in shaping Northampton Borough Council's Draft Local Plan Part 2; please do not hesitate to contact me should you have any queries regarding this response.

Yours sincerely,



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