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Northamptonshire
Council**

West Northamptonshire Council

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Mr Philip Lewis & Mr Mark Sturgess
Planning Inspectors
c/o Mr Ian Kemp
Programme Officer
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BY EMAIL

23rd August 2021

Dear Mr Lewis and Mr Sturgess

Examination of the Northampton Local Plan Part 2 2011-2029 and the revised National Planning Policy Framework

Further to your letter of 27th July, we have carried out an analysis of the policies set out in the Northampton Local Plan Part 2 to establish if any of last month's changes to the National Planning Policy Framework would have implications for the Plan's soundness. I have attached a chart setting out our analysis in full.

For the most part, the Plan is consistent with the new Framework. However, the changes set out in paragraphs 110c and 128 of the new Framework necessitate a proposed main modification to the supporting text of Local Plan Policies 2 and 3. A main modification to Policy 3 will also be proposed as a result of the new Framework's paragraph 131. The change set out in paragraph 160c of the new Framework will necessitate a review of Local Plan Policy 7 which is likely to result in a further proposed main modification.

Yours sincerely

Paul Everard

Planning Policy and Heritage Manager

NORTHAMPTON LOCAL PLAN PART 2 - IMPACTS OF THE UPDATED NATIONAL PLANNING POLICY FRAMEWORK (July 2021)

The policies of the Northampton Local Plan as submitted have been assessed to see if they are in conformity with the NPPF as amended in [July 2021]. If conformity is only achieved by way of a proposed modification to the Plan, this is set out in the column headed “Schedule of Proposed Main or Additional Modifications”.

NPPF para	Submitted Plan (Feb 2021)	Schedule of Proposed Main or Additional Modifications	Commentary
<p>8b: a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces.....</p>	<p>Policy 2 on placemaking: bullet point 1 refers to the need for well-designed developments which are attractive and adaptable to future requirements</p> <p>Policy 3 on design: bullet point 2 refers to the need to ensure safety, security, amenity, accessibility, and adaptability</p> <p>Policy 4 on amenity and layout focuses on the details of how amenity and layout considerations need to be considered to secure a high standard of amenity for occupiers</p>	<p>N/A</p>	<p>The Submitted Plan is consistent with the revisions to the NPPF</p>
<p>11a: all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area, align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects...</p>	<p>Policy 1 on presumption in favour of sustainable development: this policy localises the principle of presumption in favour of sustainable development</p> <p>Policy 3 on design: in the requirement to achieve good placemaking, states that developments should be as sustainable as possible and constructed in a sustainable fashion. It also requires that buildings are designed to be resilient in the future, considering the impacts of climate change</p> <p>Policy 5 (on carbon reduction, community energy networks, sustainable design and construction, and water use) and its accompanying justification text set out how major developments can</p>	<p>N/A</p>	<p>The Submitted Plan is consistent with the revisions to the NPPF</p>

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	<p>contribute towards mitigating against climate change through a range of measures including carbon reduction and water management</p> <p>Policy 37 on infrastructure delivery and contributions seeks contributions towards the delivery of, and where necessary, the provision of land or sites for any new infrastructure associated with a proposed development</p>		
<p>35d: Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</p>	<p>The Local Plan accords with guidelines contained in other statements of national planning policy including the Planning Practice Guidance</p>	<p>N/A</p>	<p>The Submitted Plan is consistent with the revisions to the NPPF</p>
<p>73: The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).</p>	<p>Policy 32 on designing sustainable transport and travel requires the delivery of a high quality, accessible sustainable transport network to include a range of transport options such as walking, cycling and the use of public transport</p> <p>Policy 35 on parking standards outlines the parking standards for Northampton. This demonstrates Northampton’s commitment to offering options for car users in a way that manages car use but does not encourage reliance on private cars</p>	<p>N/A</p>	<p>The Submitted Plan is consistent with the revisions to the NPPF</p>
<p>73c: set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design</p>	<p>Policy 2 on placemaking, Policy 3 on design and Policy 4 on amenity and layout all set out clear expectations of how places are to be created. Policy 3 (bullet point 6) seeks the incorporation of design coding (for major developments) to ensure consistence of design approach</p>	<p>N/A</p>	<p>The Submitted Plan is consistent with the revisions to the NPPF</p>

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guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community			
92b: are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example using attractive, well-designed, clear, and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas	<p>Policy 3 on design (bullet point 12) requires developments to create legible and permeable street layouts with good pedestrian/ cycle routes and public transport access, high quality landscaping and street furniture</p> <p>Policy 32 on designing sustainable transport and travel (bullet point 7) seeks the developments should be designed in a manner which includes the provision of streets, streetscapes and open spaces which enable and encourage children to walk, cycle and play within their local environments. Bullet point 4 also states that new development should maximise opportunities for integrated secure and safe walking and cycling routes which connect to the existing network, open spaces, and green infrastructure.</p>	N/A	The Submitted Plan is consistent with the revisions to the NPPF
96: To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.	<p>The preparation of the Local Plan was undertaken with assistance from and in consultation with – amongst others - landowners, developers, statutory consultees, local organisations and adjoining local authorities. This is in addition to the public consultation exercises undertaken</p> <p>Policy 1 on presumption in favour of sustainable development states that the Council will always work proactively with applicants.</p> <p>Policy 37 seeks contributions towards the delivery of, and where necessary, provide land or sites for</p>	N/A	The Submitted Plan is consistent with the revisions to the NPPF

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	any new infrastructure associated with a proposed development		
98: Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change.	<p>Policy 27 on green infrastructure was formulated following the completion of an evidence base which concluded that green infrastructure contributes to better community and public health as well climate change adaptation. The policy seeks the delivery of or contribution to the green infrastructure projects identified in the study</p> <p>Policy 28 on the provision of open spaces sets out the standards of open spaces that are to be provided when preparing proposals for major developments</p>	N/A	The Submitted Plan is consistent with the revisions to the NPPF
106d: provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)	<p>Policy 32 on designing sustainable transport and travel seeks to secure high quality design and street scenes whilst maximising opportunities for integrated secure and safe walking and cycling routes. The former County Council's Local Cycling and Walking Infrastructure Plan has been used to inform policy formulation</p> <p>Policy 3 on design (bullet point 12) states that new developments should be designed to create legible and permeable street layouts and public spaces with good pedestrian/cycle routes.</p>	N/A	The Submitted Plan is consistent with the revisions to the NPPF
110c: the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code	<p>Policy 3 on design (bullet point 6) seeks the incorporation of design coding to ensure consistency of design approach</p> <p>Policy 32 on designing sustainable transport and travel (bullet point 5) seeks the delivery of high-quality design of street scenes</p>	N/A	The Submitted Plan is considered to be consistent with the revisions to the NPPF in terms of the approach to design. However, the Council intends to recommend a main modification to the supporting

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			text to Policies 2 and 3 to refer to the National Model Design Code.
<p>125: Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places</p>	<p>In formulating Policy 2 on placemaking and Policy 3 on design, the Council utilised the character assessments evidence base in the Northampton Urban Design Appraisal 2016. Urban design principles contained in a variety of documents including Building for a Healthy Life, the Design Companion for Planning and Placemaking, National Design Guide and Active Design have been used to inform policy formulation</p> <p>Policy 2 expects development to create a strong, locally distinctive sense of place by responding to and enhancing locally distinct townscape, landscape, and historic environment characteristics.</p> <p>Policy 3 on design (bullet point 6) specifically refers to the incorporation of design coding to ensure consistency of design approach in major developments</p> <p>Policy 3 on design (bullet point 8) requires new development to ensure that buildings' form, massing, and facades create character and visual interest</p>	N/A	The Submitted Plan is consistent with the revisions to the NPPF
<p>126: The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.</p>	<p>Policy 2 on placemaking (bullet point 1) refers to the need for development to be well designed and attractive, and adaptable to future requirements</p> <p>Policy 3 on design seeks the incorporation of sustainable design at the beginning of the development process (bullet point 1) and be as sustainable as possible and constructed in a</p>	N/A	The Submitted Plan is consistent with the revisions to the NPPF

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	sustainable fashion (bullet point 5). The incorporation of green roofs and living walls into the building design is also included in the policy (bullet point 13)		
128: To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety ...	<p>Policy 2 on placemaking requires development to be attractive (bullet point 1)</p> <p>Policy 2 on placemaking seeks that development should respond to and enhance locally distinct townscape, landscape, and historic environment characteristics (bullet point 4)</p> <p>Policy 3 on design seeks the incorporation of design coding to ensure consistency of design approach (bullet point 6)</p>	N/A	The Submitted Plan is considered to be consistent with the revisions to the NPPF in terms of the approach to design. However, the Council intends to recommend a main modification to the supporting text to Policies 2 and 3 to refer to the National Model Design Code.
129: Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises but may also choose to prepare design codes in support of a	Policy 3 on design seeks the incorporation of design coding to ensure consistency of design approach (bullet point 6)	N/A	The Submitted Plan is consistent with the revisions to the NPPF

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<p>planning application for sites they wish to develop.</p> <p>Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, considering the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.</p>			
<p>131: Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the</p>	<p>The local plan has a policy on green infrastructure which includes assets such as trees and woodland. The Northampton Green Infrastructure Plan sets out a number of projects for Northampton which will deliver multi-functional benefits to people and wildlife. Policy 27 on green infrastructure requires new development to ensure that these assets (including trees) will be protected, maintained, managed, and connected to enhance their multi-functionality</p>	<p>N/A</p>	<p>The Council intends to recommend a main modification to Policy 3 to refer to the requirement for streets to be tree lined.</p>

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right places, and solutions are found that are compatible with highways standards and the needs of different users.			
160: All plans should apply a sequential, risk-based approach to the location of development – considering all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.	Policy 7 on flood risk and water management was informed by evidence and in consultation with Anglian Water, Environment Agency, and the Lead Local Flood Authority.	N/A	The Submitted Plan is consistent with the revisions to the NPPF
160c: using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management) ...	Policy 7 on flood risk and water management seeks to ensure that development proposals comply with relevant guidance for flood risk management and standards for surface water produced by the Local Lead Flood Authority and Anglian Water (or successor documents)	N/A	The Submitted Plan is consistent with the revisions to the NPPF. However, the Council will review the policy to ensure that it is satisfied that every opportunity is taken to reduce the causes and impacts of flooding.
161: The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source.	In assessing the suitability of the sites allocated for development, all sources of flooding were included in the assessment	N/A	The Submitted Plan is consistent with the revisions to the NPPF
180c: development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where	Policy 29 on supporting and enhancing biodiversity requires all major developments to secure a net gain in biodiversity through the strengthening management and/ or creation of new habitats. It requires proposals to include measures to enhance biodiversity within or around the development site, and contribute to	As part of the examination process, it is proposed that the policy be split into two. Policy 29a on supporting and enhancing	The Submitted Plan is consistent with the revisions to the NPPF The proposed additional main modifications will be consistent with the revisions to the NPPF

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this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.	the consolidation and development of local ecological networks	<p>biodiversity will focus primarily on the same principles as the existing Policy 29</p> <p>Policy 29b on nature conservation provides additional policy direction on matters including ecological assessments and those affecting existing designated sites including the Special Protection Area and Local Nature Reserves</p>	

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