

Northampton Borough Council Central Area Action Plan

Sustainability Appraisal Non- Technical Summary

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Northampton Borough Council

Prepared by:



**ENVIRON
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1 Introduction

Northampton Borough Council is in the process of developing its Central Area Action Plan (CAAP). The preparation of the CAAP is being subject to a combined sustainability appraisal (SA) and strategic environmental assessment (SEA).

This document comprises the Non-Technical Summary (NTS) of the SA report, which presents the results of the appraisal of the sustainability of the Pre-Submission Draft CAAP (dated October 2010).

The purpose of the NTS is to summarise the content and main findings of the SA report in a clear and concise manner to assist decision-makers in understanding what the potential environmental, social and economic effects of the Pre-Submission Draft Northampton CAAP are likely to be. The full SA report provides a more detailed description of the contents and main objectives of the CAAP; its relationship with other relevant plans and programmes; the relevant characteristics of the current state of the environment and their likely evolution without implementation of the CAAP; and the likely significant effects of the CAAP on environmental, social and economic factors.

The SA report is being published for consultation alongside the Pre-Submission Draft CAAP from the 4th November to 16th December 2010.

The purpose of this consultation is to provide the statutory environmental bodies and other interested parties the opportunity to express their opinion on the SA report. It also enables them to use the information within the SA report to guide their consideration of the Pre-Submission Draft CAAP. Please send your comments on this report by the 16th December 2010 to:

Planning Policy, Northampton Borough Council, FREEPOST MID17237, Northampton, NN1 1WJ

Email: planningpolicy@northampton.gov.uk

Telephone: 01604 838 907

**Representations can be made electronically through the on-line consultation portal at
<http://consult.northampton.gov.uk>.**

2 Northampton Central Area Action Plan

Northampton Borough Council is preparing an Area Action Plan for the Central Area of Northampton.

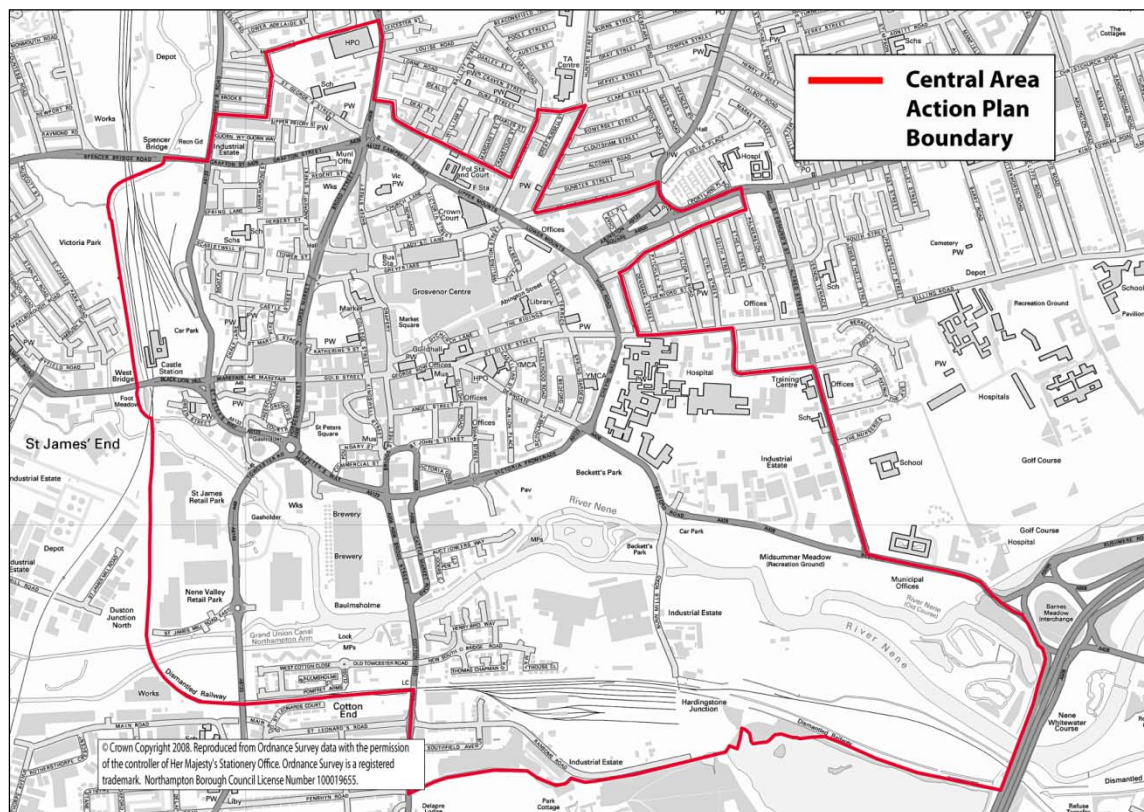
The Pre-Submission Draft CAAP contains a vision and eight strategic objectives for the area. The objectives relate to:

- Regeneration;
- A well designed City Centre;
- A destination of choice;
- A walkable city;
- A public transport and cycling;
- A safer environment;
- Repopulation of the Central Area; and
- Sustainability.

These objectives are supported by a total of 37 policies, which aim to guide future development and change and site specific land allocations (allocating land for different uses, for example, retail, housing, employment) for the Northampton Central Area.

Figure 1 below shows the location of the Northampton Central Area, the area to which the CAAP will apply.

Figure 1: Northampton Central Area



3 Methodology of the Sustainability Appraisal

The purpose of the SA is to appraise the social, environmental and economic effects of strategies and policies in a Local Development Document from the outset of the plan preparation process.

3.1 Sustainability Appraisal stages

SA has a number of set stages. These stages are explained below.

3.2 Stage A: Scoping

The scoping stage of the Sustainability Appraisal was carried out in January 2007. This included:

- A review of other relevant plans, programmes and objectives, to establish the policy context of the Pre-Submission Draft CAAP;
- A review of baseline environmental data within Northampton Central Area; and
- Identification of key issues for Northampton.

Using the information collected, an “SA Framework” or set of sustainability objectives was developed, against which the various components of the CAAP are appraised. This is shown in Table 1.

Table 1: SA Framework	
Topic	CAAP SA Objective
Air Quality and Noise	SA1: Reduce the need to travel, reduce the potential increase in congestion and facilitate modal shift. SA2: Avoid sensitive development within areas of high noise levels or poor air quality.
Archaeology & Cultural Heritage	SA3: Protect the fabric and setting of designated and undesignated archaeological sites, monuments, structures and buildings, registered Historic Parks and gardens, registered battlefields, listed buildings and conservation areas.
Biodiversity, Fauna and Flora	SA4: Maintain and enhance the structure and function of habitats and populations of species, including those specifically protected. SA5: Increase the land area of UK Biodiversity Action Plan species and habitats within the area.
Crime and Community Safety	SA7: Improve community safety and reduce crime and the fear of crime.
Energy & Climatic Factors	SA8: Support the provision of development projects and infrastructure which lead to energy efficient buildings, a reduction in carbon emissions and the provision of ‘affordable warmth’. Limit the risk to people and properties from the effects of climate change.
Health & Well Being	SA9: Improve health and reduce health inequalities.
Labour Market and	SA10: Create high quality employment opportunities and develop a strong culture of enterprise and innovation.

Table 1: SA Framework	
Topic	CAAP SA Objective
Economy	
Landscape & Townscape	SA11: Ensure that the quality, character and local distinctiveness of the landscape and townscape, and the features within them, are conserved and enhanced. SA12: Enhance the form and design of the built environment. SA13: To provide a strategic network of green infrastructure for West Northamptonshire, which will assist in the dispersal and natural migration of species and provide opportunities for linking communities to multi-functional green spaces.
Material Assets	SA14: Ensure that the housing stock and associated infrastructure meets the needs of the local people.
Population	SA15: To develop and maintain a balanced and sustainable population structure with good access to services and facilities.
Social Deprivation	SA16: To reduce spatial inequalities in social opportunities.
Soil, Geology & Land Use	SA17: Reduce land contamination. SA18 Make the most efficient use of land.
Waste	SA19: Reduce waste generation and disposal, increase reuse and recycling and achieve the sustainable management of waste.
Water	SA20: Maintain and continue to improve the quality of ground and river water. SA21: Reduce the risk of flooding. SA22: Improve efficiency of water use. SA23: N/A (not within plan area)
Education and training	SA24: Increase opportunities to participate in lifelong learning through the provision of appropriate infrastructure and facilitating access to opportunities.

3.3 Stage B: Options assessment

The Northampton CAAP Issues and Options Paper was assessed in terms of its sustainability, with the aim of assisting in the selection of the preferred approach. This is in keeping with SA guidance, which stipulates that effects of the strategic options should be identified. The Issues and Options were assessed by means of:

- A strategic assessment of the Spatial Vision and Strategic Objectives;
- An assessment of the site selection criteria to ensure that appropriate sustainability criteria are incorporated into site selection; and
- An assessment of the design principles to ensure that sustainability is incorporated into the preferred approach.

A combination of expert judgement, analysis of baseline data and analysis of GIS constraints maps were used to judge the effects of the issues and options.

3.4 Stage C: Assessment of the Pre-Submission Draft CAAP and Production of the SA Report

The various policies presented as part of the Pre-Submission Draft CAAP have been assessed for their effects on sustainability. Matrices have been used to identify the sustainability effects of the policies, in relation to each SA topic. A combination of expert judgement and analysis of baseline data has been used to judge the potential effects of the policies. A level of significance was assigned to each potential effect, using the following criteria:

- How valuable and vulnerable is the receptor that is being impacted?
- How probable, frequent, long lasting and reversible are the effects?
- What is the magnitude and spatial scale of the effect?
- Are the effects positive or negative?

The assessment involved the assessor considering the above criteria for each potential impact as well as considering how the plan will help to achieve (or not) the SA objectives. Once the SA report has been consulted on the final stages of the SA process are as follows:

- Reviewing the draft of the DPD that is submitted to the Planning Inspectorate (the Submission Draft DPD) to assess whether any changes have been made that will cause different significant sustainability effects. If there are major changes an amended SA report may need to be produced; and
- Producing a SA adoption statement (after the plan has been adopted) which outlines how the SA process and consultation process influenced the development of the plan.

4 The Policy Context and Sustainability Baseline

4.1 Relationship with other plans and programmes

In order to assist with setting the scope of the SA, a review was undertaken of other relevant plans, policies, programmes (PPPs) and objectives. This review identified recommendations for how the CAAP should address specific issues. The review is contained in Appendix A of the SA report, and a summary is provided below of how the plan has taken account of other PPPs and objectives.

<i>Air Quality and Noise</i>	The CAAP will help to support the achievement of targets set for the improvement of air quality. This will involve implementing improved public transport measures, siting new developments close to amenities/public transport infrastructure/employment and encouraging less reliance on cars.
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<i>Archaeology and Cultural Heritage</i>	The CAAP promotes design excellence and aims to ensure that new development reflects existing character areas.
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<i>Biodiversity, flora and fauna</i>	The SA has tested the CAAP for its impact on biodiversity. The CAAP
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addresses biodiversity within Policy 5 on green infrastructure.

<i>Energy and climatic factors</i>	The CAAP discusses adaptation to climate change in terms of both flooding and providing a network of green infrastructure through the town.
<i>Landscape and townscape</i>	The CAAP aims to promote design excellence and ensure that new development reflects existing character areas.
<i>Soil, geology and land use</i>	The majority of development in the CAAP is likely to be on previously developed land.
<i>Water</i>	The CAAP states that all development will need to conform to the Code for Sustainable Homes, which incorporates targets related to water use. Policy 6 addresses flooding and adequate drainage to reduce pollution.
<i>Waste</i>	Waste is not addressed in the CAAP. However, the plan states that all development will need to conform to the Code for Sustainable Homes standards, which incorporate targets related to recycling and waste.
<i>Social Issues</i>	The CAAP aims to improve the public realm and contribute to the green infrastructure of the town, which should have positive effects on health and crime
<i>Material assets and economic issues</i>	The CAAP aims to regenerate the town centre and its employment base, including retail capacity, office and business uses and leisure uses.

4.2 The Sustainability Baseline

Baseline information was collected for the following sustainability topics in a suite of topic papers. A summary of the key issues is provided in Table 2 below.

Table 2: Key baseline issues and future baseline	
Issue	Likely future baseline (in the absence of the plan)
<p>Air quality and noise</p> <p>Principal pollution source affecting air quality is vehicular traffic. There are three AQMAs in the Central Area. Only one of these AQMAs has an action plan in place. Congestion has been identified as a major issue on key roads in the Central Area.</p> <p>Noise is an issue in the borough of Northampton, with the number of complaints increasing. The majority of complaints are related to traffic and neighbourhood noise.</p>	<p>There are likely to be reductions in transport funding over the next few years due to general reductions in public spending. This may compromise future sustainable transport initiatives and mean that air quality will decline in future years.</p> <p>Noise problems related to traffic may increase. There is uncertainty regarding what will happen to neighborhood noise in the future baseline.</p>
<p>Archaeology and cultural heritage</p> <p>There are a large number of designated places of archaeological, architectural and historic importance in the Central Area.</p>	<p>If no development takes place (in the absence of the plan) the value of the designated areas should remain the same. The exception is Sessions House which is on the Buildings at Risk register and may decline if not maintained in the proper manner.</p>
<p>Biodiversity, flora and fauna</p> <p>At present there are no wildlife sites of international or national importance within the Central Area but there are several County Wildlife Sites within or adjacent to the Central Area.</p> <p>The Central Area contains a number of valued habitats including rivers and wetlands.</p>	<p>As long as planning procedures are followed wildlife sites should continue to be protected.</p> <p>There is a need to increase ecological connectivity between rural and urban landscapes. Climate change could have an effect on water supply and could affect many species of wildlife and their habitats that rely on adequate water supplies. It is not possible to predict accurately the effects of climate change.</p>
<p>Crime and community safety</p> <p>Overall recorded crime and perception of crime.</p> <p>Issue of community safety and security in Central Area especially in St Crispin Ward.</p>	<p>Within Castle Ward, crime has decreased but has increased in St. Crispin Ward. If these trends are long term it can be assumed that crime will continue to rise in St. Crispin but will fall in Castle Ward.</p> <p>The levels of anti-social behaviour within Castle are average. Levels within St. Crispin are high. If the trends continue of anti social behaviour may increase in St. Crispin ward.</p>
<p>Energy and climatic factors</p> <p>Increasing need to include climate change adaptation measures within development planning for example to reduce the risk of flooding and subsidence, to decrease, solar gain during summer months and heat loss</p>	<p>If adaptation measures are included within development proposals the ability of the central area to respond positively to a changing climate should improve.</p> <p>Road transport may increase if funding for more sustainable transport is</p>

Table 2: Key baseline issues and future baseline	
Issue	Likely future baseline (in the absence of the plan)
during winter months and to avoid contribution to the urban heat island effect. Carbon emissions within the Central Area are increasing from road transport, domestic energy and industrial energy.	reduced. This will mean that emissions from transport will increase. In terms of domestic energy the building regulations will be tightened in the future. However, new buildings are only a fraction of the issue.
Health Improving the health of people in the Central Area Improving access to health services	People living in the Central Area have lower life expectancy than the average in the Borough and experience higher levels of limiting long term illness. If these trends continue (in the absence of the regeneration which will be supported by the plan) the health of the residents will get worse. Improving access to health care has been identified as key in Northamptonshire. In the light of this access to health in the Central Area may improve. However, this is likely to be moderated by budget constraints.
Labour market and economy Northampton is a healthy and vibrant business location. The highest number of Job Seekers Allowance claims is in Castle (part of the Central Area) followed by St Crispin (also in the Central Area)	There are a number of areas of improvement needed including improvements to the environmental quality of the centre and an increased convenience retail offer. However, without the CAAP to drive development and development quality, the vibrancy of the centre is likely to decrease. The levels of unemployment are related to the general health of the national economy. Forecasts are very uncertain at the moment so the future baseline is also uncertain.
Landscape and townscape Many areas of the town are good in terms of townscape and these correlate closely with the retained historic street pattern and building fabric. Whilst there are some areas of open and green space within the Central Area, it is scattered and in general, not well connected.	Without the masterplan strategy as set out in the CAAP, areas deemed poor will be pro-actively improved leading to a degradation in townscape quality. Without development taking place in a managed way in the Central Area, there is likely to be a lack of funds to take forward such improvements.
Material assets Meeting future requirements for residential development and ensuring and appropriate supply of employment land and property.	Northampton's housing allocation increases over the period of the plan indicating that it will need to significantly increase its rate of housing delivery to meet its allocated figures. Without the pro-active planning represented by the CAAP it is unlikely that Northampton will be able to provide enough housing and provide enough employment land to satisfy future requirements.
Population	Population growth in Northampton is faster than regional and national levels.

Table 2: Key baseline issues and future baseline	
Issue	Likely future baseline (in the absence of the plan)
High population growth and density	If this trend continues population will continue to grow in the future baseline.
Deprivation High levels of deprivation in parts of the Central Area	There are some programmes in place to try and tackle deprivation in the Central Area. However, with general cuts in public spending there may be limits to the improvements that can be made.
Soil, geology and land	
Maximising the use of brownfield land.	The amount of development that is built on brownfield land should remain high in the Central Area.

5 Results of the Sustainability Appraisal

5.1 The reasons for selecting alternatives

Table 3 below summarises the assessment of the CAAP Issues and Options document, as detailed in section 3.3 above.

Table 3: The influence of the SA on option selection	
Finding of the SA of the Issues and Options paper	How this is reflected in the plan
Vision and Objectives	
The vision and in particular the objectives seem to give equal priority to all forms of transport. It would be useful if the balance was shifted towards public transport, cycling and walking and the vision and objectives recognise that modal shift is vital if development is to be sustainable	The vision now refers to a new inter-city railway facility. The plan also now has an objective on planning for a walkable city and an objective on public transport and cycling.
Strategic Objective 5 would benefit from inclusion of more detail on the natural environment and a reflection of the key role that the river plays in the town	The natural environment is still not explicitly covered in the strategic objectives. The waterside is extensively addressed in the PO document as is improving the town's green infrastructure network.
The vision could be clearer regarding on the principles that sustainable development should be based on. It is unclear what the phrase "encourages and delivers sustainable development" covers	The CAAP makes the point that it forms part of a suite of documents and it does not aim to repeat policies already contained in the Joint Core Strategy, for example. Sustainable development policies are addressed in the Joint Core Strategy.
In terms of energy and climate issues, the vision would benefit from reference to climate proofing and adaptation. The SA scoping report showed that this was likely to be a key issue in the Central Area	The vision does not address climate change. One of the plan objectives is to help create a positive framework for action on climate change.
As levels of ill health are higher in the Central Area than other areas in the Borough, the vision should refer to providing a safe, comfortable and healthy environment	The strategic objectives refer to providing a safe environment and aim to provide town centre facilities (this would include community facilities).
The vision might benefit from more detail on the economic sectors that are being targeted in the Central Area. For example, the Sub Regional Economic Strategy (SRES) identifies that Northampton has a disproportionately small share of knowledge intensive occupations and that the town centre and Central Area should form a core part of the strategy for achieving this growth in knowledge intensive industries	This is not addressed in the vision but perhaps this is too detailed a comment to be addressed in the vision.
The vision does not address housing need, instead focusing on retail and other employment sectors. This is	Residential development is now mentioned

Table 3: The influence of the SA on option selection

Finding of the SA of the Issues and Options paper	How this is reflected in the plan
perhaps unsurprising because of the nature of the Central Area. However, housing (and affordable housing in particular) are key issues and need to be addressed in the vision	in the vision with regard to the Waterside.
Criteria for Development Sites Assessment	
The council used the criteria for development sites internally within the council to identify development sites. Several comments were provided to the council regarding these criteria and these were incorporated by the council into their framework to choose development sites to go in the final plan.	
Design Principles	
<p>Code for Sustainable Homes: In line with the <i>West Northamptonshire Development Corporation Planning Principles 2007: A Consultation Guide</i> we recommended the following:</p> <ul style="list-style-type: none"> Any residential units to be delivered 2010-2012 must meet code level 3 as a minimum; Any residential units to be delivered 2013-2015 must meet code level 4 as a minimum; Post 2016 all units must be 'zero carbon' and meet code level 6 as a minimum 	The CAAP does not address this issue. This issue is being addressed in the Joint Core Strategy.
BREEAM: Between 2010-2016 non residential developments meet very good as a minimum and excellent from 2016 onwards.	The CAAP does not address this issue. This issue is being addressed in the Joint Core Strategy.

5.2 The assessment of the Pre-Submission Draft DPD

The assessment identified the following significant negative effects:

- Policy 17 is predicted to have a significant negative impact in relation to air quality and noise, as the policy is likely to have an adverse impact on the AQMAs in the vicinity of Great Russell Street and Bridge Street;
- Policy 21 is predicted to a significant negative impact in relation to air quality and noise, as it is likely to have an adverse impact on the AQMA in the vicinity of the St John's church;
- Policy 24 is predicted to have a significant negative impact in relation to air quality and noise, as it proposes new residential development in the vicinity of St Michael's Road AQMA without any particular measures to improve air quality and the noise environment;
- Policy 25 is predicted to have a significant negative impact in relation to air quality and noise, as it proposes new residential development in the vicinity of the Grafton Street/Broad Street AQMA without any particular measures to improve air quality and the noise environment; and

- Policy 35 is predicted to have a significant negative impact in relation to air quality and noise, as it proposes new mixed use development at the former Royal Mail Sorting Office, very close to the Barrack Road AQMA and does not provide for any measures for limiting or slowing traffic in the area.

The assessment identified the following significant positive effects:

- The Vision in relation to reducing social deprivation;
- Strategic Objectives in relation to crime and community safety, labour market and economy, population, social deprivation and soil, geology and land use;
- Policy 2 in relation to archaeology and cultural heritage, crime and community safety and landscape and townscape;
- Policy 3 in relation to archaeology and cultural heritage, landscape and townscape, population and soil, geology and land use;
- Policy 4 in relation to material assets;
- Policy 5 in relation to energy and climatic factors and landscape and townscape;
- Policy 6 in relation to biodiversity, fauna and flora, energy and climatic factors;
- Policy 8 in relation to labour market and economy;
- Policy 14 in relation to labour market and economy, landscape and townscape, population and social deprivation;
- Policy 16 in relation to labour market and economy and material assets;
- Policy 17 in relation to population, social deprivation and soil, geology and land use;
- Policy 18 in relation to air quality and noise, archaeology and cultural heritage, crime and community safety, health and well being, labour market and economy, landscape and townscape, material assets, population and social deprivation;
- Policy 19 in relation to archaeology and cultural heritage, landscape and townscape and population;
- Policy 20 in relation to air quality and noise, archaeology and cultural heritage, labour market and economy, landscape and townscape and material assets;
- Policy 21 in relation to labour market and economy, material assets and population;
- Policy 22: In relation to archaeology and cultural heritage, labour market and economy, landscape and townscape, material assets and population;
- Policy 23 in relation to labour market and economy, material assets and population;
- Policy 24 in relation to archaeology and cultural heritage, health and well being, labour market and economy, landscape and townscape, material assets and population;
- Policy 25 in relation to archaeology and cultural heritage, health and well being, labour market and economy, landscape and townscape, material assets and population;
- Policies 26-31 in relation to biodiversity, fauna and flora, health and well being, labour market and economy, landscape and townscape, material assets and population, water and education and training;

- Policy 32 in relation to crime and community safety, health and well being, labour market and economy, landscape and townscape, material assets, population and social deprivation;
- Policy 33 in relation to archaeology and cultural heritage, landscape and townscape, population and social deprivation;
- Policy 34 in relation to archaeology and cultural heritage, health and well being, labour market and economy, landscape and townscape, material assets, population and social deprivation;
- Policy 35 in relation to archaeology and cultural heritage, biodiversity, flora and fauna, health and well being, landscape and townscape, material assets, population and social deprivation;
- Policy 36 in relation to biodiversity, fauna and flora, landscape and townscape, material assets, population and social deprivation; and
- Policy 37 in relation to air quality and noise, labour market and economy, material assets and population.

In addition, some cumulative effects were identified, that is, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect:

- **New inter-city railway facility at Castle Station:** The development of the railway station may cause some cumulative construction impacts with development in Spring Boroughs. However, this is an **uncertain effect** because of the uncertainty regarding when development may happen in Spring Boroughs.
- **The University of Northampton student plans for new student accommodation:** There is uncertainty over the location of this development so it is not possible to make a judgement regarding cumulative effects. This is an **uncertain effect**. The general principle of increasing student accommodation in the Central Area will be positive as it will help to support services in the centre.
- **West Northamptonshire Emergent Joint Core Strategy (2009):** At the moment most people in Northampton do not work in the centre. Bringing more people within commuting distance of the town centre whilst strengthening the office sector will be positive for the economy of the CAAP. However, this could increase commuting and increase congestion and air pollution in the centre. Combined with the recognised uncertain impact of CAAP development on transport, the cumulative effect will be **uncertain**. Good public transport links will be needed.
- **Minerals and Waste Development Plan Document Core Strategy Adopted Plan (May 2010) / Locations for Mineral Development, Development Plan Document Submission (March 2010) / Locations for Waste Development, Development Plan Document Submission (January, 2009):** According to the Core Strategy, significant integrated waste facilities and the majority of advanced treatment facilities should be located within the central spine (of which Northampton forms a key part). Policies W1 – W3 of the *Locations for Waste Development Document* allocate waste management sites (including some in Northampton). None of these sites are in the Central Area. As no sites are allocated in the Central Area there will be **no direct cumulative effects**. However, the fact that a strategic waste management site will be located on the

outskirts of Northampton is positive because this means that the waste produced by the development in the Central Area will be treated near to source. This will reduce the miles travelled and this will have a **positive effect** on carbon emissions. The significance of this effect is not certain because the exact location and amounts of waste are unknown.

- **Effects of increased traffic:** No evidence is presented (through traffic modelling for example) that transport measures suggested as part of the CAAP will be effective in reducing the impact of the significant levels of development in the Central Area. Coupled with the fact that public funding available for transport improvements will reduce over the next few years this raises a concern that development will increase traffic related problems in Northampton. There is a risk that **there will be a cumulative significant negative effect on traffic** and related sustainability effects including on air quality, noise, townscape and heritage.
- **Effects of resource use:** There is likely to be a large amount of development in the Central Area over the next few years and this could put great pressure on natural resources such as energy, minerals and water and could cause waste generation to increase. Policy 2 does briefly address resource use but there is no coherent approach to sustainable design and standards that developments should meet and this poses a risk that there will be a **cumulative significant negative effect** on natural resources.

5.3 Mitigation and enhancement measures

Mitigation measures have been suggested to offset any negative or uncertain effects that have been identified as part of the assessment. Where possible enhancement measures have been suggested to enhance the positive effects of policies.

A large number and mitigation and enhancement measures have been proposed within the document. The mitigation measures are included in Table 4. Please see the full SA report for the enhancement measures.

Table 4: Mitigation measures

Policy	Mitigation measures
Vision	<ul style="list-style-type: none"> • include reference to protection of habitats and enhancement of biodiversity throughout the City Centre, particularly with regard to enhanced provision of natural and semi-natural open space; • include reference to encouraging energy efficiency in buildings and renewable energy generation. Clear reference should be made to the fact that policies on energy efficiency and renewable energy resources will be included in the Joint Core Strategy; • include reference to encouraging waste reduction and recycling; • include reference to reducing flood risk, maintaining water quality and improving efficiency of water use; and • reference should be made to enhancing access to education and training facilities.
1	<ul style="list-style-type: none"> • include reference to biodiversity conservation and enhancement in the strategic objectives; • include reference to improving health and reducing health inequalities; • include reference to provision of green infrastructure; • the strategic objectives should include reference to encouraging waste reduction and

Table 4: Mitigation measures

Policy	Mitigation measures
	<ul style="list-style-type: none"> recycling; include reference to reducing flood risk, maintaining water quality and improving efficiency of water use; and reference should be made to enhancing access to education and training facilities.
2	<ul style="list-style-type: none"> include reference to provision of recycling facilities and minimisation of waste during the construction stage; and the plan should specifically address renewable energy generation, giving support for its development and guidelines on which technologies would be acceptable. The plan should ensure there is encouragement of the consideration of local energy efficiency and renewable energy use for some of the major schemes especially regarding technologies such as combined heat and power (CHP); if possible, the Submission Draft of the CAAP should refer to the level expected to be achieved in the BREEAM and Code Standards set out as part of the Joint Core Strategy. If the levels expected to be achieved by different major development sites will differ this should be set out in the individual policies for the sites.
3	<ul style="list-style-type: none"> include reference to avoiding canyon effects, which can be created by tall buildings;
4	<ul style="list-style-type: none"> include specific reference to enhancing the setting of Northampton historic town centre and any particular cultural heritage assets, e.g. around the Market Square and St John's; include reference to waste recycling during construction and incorporation of waste recycling facilities into areas of public realm during their operation; include reference to use of green infrastructure/biodiversity features for reduction of flood risk and maintain water quality (e.g. in the River Nene).
6	<ul style="list-style-type: none"> Ensure proposals for new development and infrastructure adhere to the results of the Northampton CAAP Drainage Strategy (expected March 2011). This requirement should be built into Policy 6.
16	<ul style="list-style-type: none"> include measures to limit vehicle numbers in the Angel Street/St John's area, e.g. through including a cross-reference to Policies 7, 8, 10 and 11; and Policy 16 should ensure that the heritage value of the existing built environment and streetscape is not lost through new office development.
17	<ul style="list-style-type: none"> include measures to reduce traffic movements in new residential development in the vicinity of AQMAs, e.g. through incorporating traffic calming measures and reducing on-street parking provision; the policy should include specific reference to improving community safety in areas designated for new housing development
19	<ul style="list-style-type: none"> reference should be made to providing traffic calming measures in the area around the Fish Market redevelopment.
21	<ul style="list-style-type: none"> Policy 21 should include measures to limit traffic volume.
22	<ul style="list-style-type: none"> include requirement for traffic calming measures in the vicinity of the proposed Angel Street redevelopment.
24	<ul style="list-style-type: none"> the policy should include provision for enhancing the air quality and noise environment, given the presence of an AQMA along St Michael's Road, for example, through traffic calming measures.
25	<ul style="list-style-type: none"> the policy should include provision for enhancing the air quality and noise environment, given the presence of an AQMA at the crossroads in the north-eastern corner of Spring

Table 4: Mitigation measures

Policy	Mitigation measures
	<p>Boroughs, for example, through junction improvements and traffic slowing measures;</p> <ul style="list-style-type: none"> include provision for enhancing the facilities at Spring Lane Primary School, in order to assist with raising achievement levels at this school.
26-31	<ul style="list-style-type: none"> the CAAP should ensure that any proposals that come forward for Nene Meadows take account of the proximity to the Upper Nene Valley Gravel Pits and any potential to increase activity in the area that might have an adverse impact on it. Proposals should be brought forward in consultation with Natural England and the Environment Agency to ensure the appropriate management of the Meadows (Local Nature Reserve) and the Upper Nene Valley Gravel Pits. The CAAP should ensure that a package of mitigation measures for each development should be linked to Developer Contributions. Any contributions would need to be agreed by Natural England and be brought forward as part of the delivery of development at Nene Meadows by individual applicants. It would be useful if these requirements were added to policy within the CAAP.
35	<ul style="list-style-type: none"> include reference in the policy to limiting the impact of traffic within the Barrack Road AQMA.

5.4 Difficulties encountered in the assessment

SA is a strategic assessment and the main difficulty encountered during the assessment of the plan was lack of detail regarding how some policies would be implemented. Another difficulty was a lack of available baseline data in some cases. The effect of these uncertainties was minimised by use of the 'precautionary approach', especially with qualitative judgements, and mitigation has been suggested if there is any doubt as to the effect of the plan.

In addition, it is difficult to assign significance to the effects because of the lack of detail available on how policies are likely to be implemented. Due to these uncertainties, it is difficult to consider the various SA topics as, in many cases, the information will not be available on the nature of the receptors and the potential impacts. However, an approach to significance has been adopted for the assessment which focuses more on the achievement of the SA objectives (Table 1) and on the improvement of the existing baseline information.

6 Monitoring

An outline monitoring programme is included in the SA report, as follows:

Table 5: CAAP SA monitoring programme

Significant / uncertain effect identified	Monitoring required
Significant negative impact: Policy 17 on air quality and noise. Policy 17 is predicted to have a significant negative impact in relation to air quality and noise, as the policy is likely to have an adverse impact on the AQMAs in the vicinity of Great Russell Street and Bridge Street.	Air quality monitoring should be required in the vicinity of all new development that could increase air pollution. This should be specified as part of planning permission.
Significant negative impact: Policy 21 on air quality and noise. Policy 21 is predicted to a significant negative impact in relation to air quality and noise, as it is likely to have an adverse impact on the AQMA in the vicinity of the St John's church	
Significant negative impact: Policy 24 on air quality and noise. Policy 24 is predicted to have a significant negative impact in relation to air quality and noise, as it proposes new residential development in the vicinity of St Michael's Road AQMA without any particular measures to improve air quality and the noise environment.	Air quality monitoring should be required in the vicinity of all new development that could increase air pollution. This should be specified as part of planning permission.
Significant negative impact: Policy 25 on air quality and noise. Policy 25 is predicted to have a significant negative impact in relation to air quality and noise, as it proposes new residential development in the vicinity of the Grafton Street/Broad Street AQMA without any particular measures to improve air quality and the noise environment.	
Significant negative impact: Policy 35 on air quality and noise. Policy 35 is predicted to have a significant negative impact in relation to air quality and noise, as it proposes new mixed use development at the former Royal Mail Sorting Office, very close to the Barrack Road AQMA and does not provide for any measures for limiting or slowing traffic in the area.	
Uncertain impact: Policy 3 on air quality and noise. Policy 3 does not reference preventing canyon effects, which can result when tall buildings situated on either side of a street prevent the dispersion of air pollution.	Any planning applications for tall buildings need to build in specific monitoring of air quality canyon effects.
Uncertain impact: Policies 7, 8, 9, 10 and 11 on air quality and noise, archaeology and cultural heritage, energy and climatic factors and landscape and townscape. There is no evidence presented (through traffic modelling for example) that the measures will be effective in reducing the impact of the significant levels of development in	Traffic levels should be monitored as development progresses through its various stages in Northampton.

Table 5: CAAP SA monitoring programme

Significant / uncertain effect identified	Monitoring required
the Central Area. Coupled with the fact that public funding available for transport improvements will reduce over the next few years this raises a concern that development will increase traffic related problems (including air and noise pollution) in Northampton.	
Uncertain impact: Policy 16 on landscape and townscape. Policy 16 states that existing employment sites will be retained for employment use; however, their redevelopment for office use and/or intensification of the existing office stock will be supported. Care must be taken that new development does not add to this increasing trend of amalgamation of building plots. It is uncertain whether the policy will protect against this. Therefore, an uncertain impact is predicted.	Monitoring of new employment development will need to be undertaken in order to ensure that development does not increase amalgamation of building plots to the detriment of the character of the town.
Uncertain impact: Policy 17 on crime and community safety. The policy brings housing development into areas that have a thriving night-time economy. Northampton has a higher than average level of crime partly due to this night-time economy. This night time economy could cause conflicts with housing (depending on the success of the action plan as a whole), especially family housing. Particular areas include Angel Street and Bridge Street. Therefore, it is predicted to have an uncertain impact in relation to this SA objective.	Crime and anti social behaviour levels in new residential areas need to be monitored.
Uncertain impact: Policies 19, 22, 23, 33, 34 on air quality and noise. Policy 19 seeks to ensure that strong connections are made between the Fish Market redevelopment and the Drapery and Grosvenor Centre redevelopments, which could assist with traffic movement and help to reduce air emissions and noise. However, please see the appraisal on the transport policies which highlights the fact that work undertaken on transportation impacts is not yet complete. This means that the impact is uncertain.	See monitoring required for Policies 7, 8, 9, 10 and 11 above.
Uncertain impact: Policy 25 on education and training. Policy 25 prioritises the provision of an urban school site to cater for a 2 form entry primary school. The existing school in the area, Spring Lane Primary School, currently has a low achievement level compared to the Northamptonshire average, however, improvements to this existing school are not addressed in the policy. Therefore, the policy currently has an uncertain impact in relation to this SA objective.	Achievement levels in Spring Land Primary School should be monitored. Improvements to this school should be considered in the policy if relevant.
Uncertain impact: The development of the railway	The likely timing of the various developments

Table 5: CAAP SA monitoring programme

Significant / uncertain effect identified	Monitoring required
station may cause some cumulative construction impacts with development in Spring Boroughs. However, this is an uncertain effect because of the uncertainty regarding when development may happen in Spring Boroughs.	should be monitored to ensure that mitigation can be put in place to reduce construction impacts
Uncertain impact: The cumulative effect of the University of Northampton student plans for new student accommodation with the rest of the development in the Central Area is uncertain.	The likely timing of the various developments should be monitored to ensure that mitigation can be put in place to reduce negative impacts.
Uncertain impact: The cumulative effect of the development proposed on the edge of Northampton (in the Joint Core Strategy) and development in the Central Area is uncertain.	The likely timing of the various developments should be monitored to ensure that mitigation can be put in place to reduce negative impacts.
Significant cumulative negative impact: No evidence is presented (through traffic modelling for example) that transport measures suggested as part of the CAAP will be effective in reducing the impact of the significant levels of development in the Central Area. There is a risk that there will be a cumulative significant negative effect on traffic and related sustainability effects including on air quality, noise, townscape and heritage.	Traffic levels should be monitored as development progresses through its various stages in Northampton.
Significant cumulative negative impact: There is likely to be a large amount of development in the Central Area over the next few years and this could put great pressure on natural resources such as energy, minerals and water and could cause waste generation to increase.	The level of BREEAM and Code for Sustainable Homes specified for each major development should be monitored to ensure that levels are challenging enough.

7 Next steps

Consultation on the CAAP and the SA report at this Pre-Submission stage is the opportunity for formal representations to be made.

The Council will consider the representations received, and decide whether it should make any changes. The finalised plan will then be submitted to the Secretary of State, who will arrange for it to be examined by an independent Planning Inspector. The examination hearings will be held in public, following which the Planning Inspector will issue a report. The Council will then amend the plan to reflect any changes made by the Inspector and subsequently adopt it. Any such changes would have to be subject of further SA and a revised SA Report.

A Sustainability Appraisal (SA) adoption statement will need to be published in accordance with the SEA Regulations (Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes). These regulations state that as soon as reasonably practicable after the adoption of the plan a statement should be produced and published setting out how environmental considerations and opinions expressed through consultation have been taken into account in the planning process.

The SEA Regulations set out the particulars that should be covered by the statement as follows:

- How environmental (sustainability) considerations have been integrated into the CAAP;
- How the environmental (SA) report has been taken into account;
- How opinions expressed in response to consultation have been taken into account;
- The reasons for choosing the CAAP as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental (sustainability) effects of the implementation of the CAAP.

For further information on the timetable with regard to the next steps in the production of CAAP please see the Council's website.