NORTHAMPTON CENTRAL AREA ACTION PLAN

TECHNICAL PAPER

SUBMISSION

May 2012
CENTRAL AREA ACTION PLAN
BACKGROUND TECHNICAL PAPER

OVERALL STRATEGY

1. INTRODUCTION

a. Process and Progress

1.1 The Northampton Central Area Action Plan (CAAP) provides an exciting opportunity to deliver a new and bold vision for the centre of Northampton that meets the needs of communities to the period 2026 and beyond. Strategic planning policy (as set out in East Midlands Regional Plan March 2009) clearly establishes Northampton as the principal urban area in Northamptonshire and regional centre for economic growth, commerce, retail and leisure.

1.2 The Plan has been through the following stages of the plan preparation process in order to reach the formal Submission stage. The Plan was subject to two Regulation 18 (The Town & Country Planning (Local Planning)(England) Regulations 2012 (Regulation 25 as was under the 2008 Regulations) consultations in the shape of the Issues and Options (September, 2007) and The Emerging Strategy (August, 2009) documents. In November 2010 the Pre-Submission draft CAAP was published under Regulation 19 (Regulation 27 as was). The Pre-Submission CAAP was then subject to focused changes in November 2011 to reflect the Council’s progress in delivering major projects across the Central Area and the cumulative impact this had on a number of policies within the Plan.

b. Technical Papers

1.3 To support and provide justification for the planning policy within the Plan, a series of Technical Papers have been published by the Council. These technical papers explain how each policy has been formulated in the context of local and national planning policy, evidence base documents and the results of formal public consultation. In addition, each technical paper provides further information on how each policy will be delivered in practice. It also sets out how the implementation of each policy will be monitored by the local planning authority.

1.4 The series of Technical Papers have been split into two types; topic based and site specific technical papers. This is consistent with the two types of policy in the CAAP document. For ease of reference, some topic and sites specific policy papers have been merged. For example, the Retail Technical Paper contains the justification for site specific policies relating to predominately retail development e.g. Policy 16 Grosvenor Centre, Policy 31 Drapery and Policy 17 Abington Street East.

1.5 Site specific policies focus on the delivery of developments and contain the policy requirements for each development to meet as and when they come forward in the future.
The topic based policies guide the quality and quantity of development across the Central Area, for example, urban design objectives for development to meet and housing numbers to be delivered.

2. POLICY CONTEXT

2.1 The policy context shows how the delivery of the CAAP conforms to strategic, regional and national planning policy. As the CAAP is pre-empting the West Northamptonshire Joint Core Strategy (WNJCS) in terms of delivery, in terms of plan making, the East Midlands Regional Plan remains a significant policy consideration. The East Midlands Plan provides a clear policy context for central Northampton which the CAAP seeks to deliver.

a Strategic Planning Policy

West Northamptonshire Joint Core Strategy: Pre Submission (February, 2011)

2.1 The West Northamptonshire Joint Core Strategy (WNJCS) has been prepared by the West Northamptonshire Joint Planning Unit on behalf of Northampton Borough Council, Daventry District Council and South Northamptonshire Council. In terms of the plan preparation, the WNJCS reached Regulation 18 stage (Regulation 25 as was) in July 2009 and was published at Pre-Submission stage (Regulation 19, Regulation 27 as was) in February 2011. It is scheduled to reach the Submission stage towards the end of 2012.

2.2 The WNJCS sets out the long-term vision and objectives for the whole of the West Northamptonshire area for the plan period to 2026. It provides the strategic policies for steering and shaping development. It provides specific locations for new development in the form of strategic urban extensions and strategic figures for the delivery of housing, retail floorspace, employment floorspace and associated infrastructure requirements.

2.3 In relation to Northampton the WNJCS plays a critical role in identifying Northampton centre as a focus for new development. Indeed, Spatial Objective 5: Supporting Northampton Town Centre for the WNJCS states, ‘To support the regeneration of Northampton’s town centre by making it the focus of high quality retail, employment, leisure and cultural development at the heart of Northamptonshire and to support the delivery of the Northampton Central Area Action Plan’. Key to delivering Spatial Objective 5 is Policy N1: The Regeneration of Northampton and Policy N2: Northampton Central Area.

b Regional Planning Policy

East Midlands Regional Plan (March, 2009)

2.4 The delivery of a CAAP conforms to Policy MKSM SRS Northamptonshire 3: Northampton Central Area. This policy promotes the production of a Development Plan Document for the Central Area to provide a long-term framework for revitalising and upgrading the quality and facilities of the Central Area. However, it is acknowledged that the Regional Plan will be revoked by the government, probably at some point in 2012.
National Planning Policy Framework (NPPF) (March 2012)

2.5 Paragraph 23 of the NPPF clearly sets out the expectation of government in relation to ‘Ensuring the Vitality of town centres’. In addressing these expectations, the CAAP identifies the town centre as the heart of the community and pursues policies to support its vitality and viability. It defines the extent of the town centre and primary shopping areas, based on a clear definition of primary and secondary frontages, and sets out policies that make clear which uses will be permitted in such locations. It promotes a competitive town centre, providing for customer choice and a diverse retail offer, which takes account of and reflects the individuality of the town centre. It seeks to enhance the existing market and in particular its setting, ensuring it remains attractive and competitive.

2.6 The Action Plan allocates a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed. The amount of land identified is consistent with identified needs through thorough technical assessments that have taken place and will not compromise meeting demand. It allocates appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. It recognises that residential development can play an important role in ensuring the vitality of the town centre and sets out policies to encourage residential development on appropriate sites.

National Planning Policy Statements / Planning Policy Guidance Notes

2.7 Reference is made to former Planning Policy Statements and Planning Policy Guidance Notes where appropriate to highlight key influences on the evolution of policies contained within the CAAP. It is however recognised that these documents no longer have any formal Government endorsement, having been replaced in their entirety by the NPPF. Notwithstanding the fact that policy might have been developed in accordance with previous government policy / guidance a process of checking the CAAP policy has been undertaken to ensure it is consistent with the contents of the NPPF.

3. CAAP VISION AND OBJECTIVES

3.1 The vision for the centre of Northampton has been developed in the context of policy brought forward as part of the regional plan and WNJCS which identifies Northampton town centre as a cultural and economic hub for Northamptonshire. The vision also makes it clear that to strengthen Northampton’s regional role and attract inward investment CAAP policy will look to capitalise on Northampton’s existing strengths as a destination such as the riverside, rich architectural heritage and distinctive retail offer.

3.2 The Strategic Objectives provide a clear mechanism to deliver the overall vision for the CAAP and address issues identified in the Spatial Portrait. The Strategic Objectives seek to provide further overarching guidance for development proposals in the Central Area in terms of the development the Council is seeking to deliver individually and collectively. The various stages of consultation undertaken and representations received have generally been supportive in relation to the Vision and Objectives. This has resulted in a little amendment being made to them from the Emerging Strategy – August 2009 stage. The most significant changes have been around the former identification of Northampton as a ‘city’ centre and in making more of the heritage that the centre has.
The term City split opinion, particularly given Northampton’s historic ‘county town’ role and the lack of formal city recognition in statute as so was changed to town. Strategic Objective SO2 was amended to make further reference to the heritage of the centre.

4. DELIVERABILITY

4.1 The topic based policies in conjunction with the sites specific policies will deliver each of the Strategic Objectives and ultimately the vision of the CAAP.

4.2 For example Policy 1 Promoting Design Excellence will be a driver behind ensuring proposals help meet CAAP Strategic Objective 2 ‘A well designed town centre’, Strategic Objective 4 ‘A walkable centre’ and Strategic Objective 6 ‘A safer environment’. The Plan contains in its appendix how each policy within the CAAP helps to deliver one or multiple Strategic Objectives.

5. MONITORING AND IMPLEMENTATION

5.1 The topic based policies in conjunction with the sites specific policies will identify more clearly the monitoring framework that will apply to each policy to ensure that delivered outputs or anticipated outcomes can be monitored. A monitoring framework is clearly defined within the Infrastructure, Delivery and Monitoring section of the Plan, including key delivery goals and target dates, together with contingencies where appropriate to overcome any problems of delivery associated with the policy.
1. INTRODUCTION

1.1 This paper provides the supporting background information for CAAP Policy 1: Delivering Design Excellence & Policy 2: Tall Buildings.

a. Delivering Design Excellence

1.2 Northampton’s Central Area still retains a considerable amount of its historical character and contains heritage assets such as Grade I and II Listed Buildings, Scheduled Monuments and Locally Listed Buildings. At present much of the historic character in the Central Area is protected through the four designated Conservation Areas; St Giles Conservation Area, All Saints Conservation Area, Derngate Conservation Area and Holy Sepulchre Conservation Area, that are wholly contained within the Central Area boundary. A further two, the Boot and Shoe and Billing Road Conservation Areas have part of their boundaries within the Central Area.

1.3 A key aspect of improving Northampton's Central Area will be promoting a step change in the design quality of new development, to ensure that new development integrates successfully with heritage assets and other existing buildings. Buildings and public spaces should be developed to the highest design quality in terms of appearance, scale, massing and materials. This will assist in preserving and enhancing the character of heritage assets and the surrounding local area. Promoting a high standard will help raise the profile of Northampton Central Area as a place to live, work and socialise; this in turn instil pride in residents of Northampton and help promote inward investment.

b. Tall Buildings

1.4 As Northampton grows, it is envisaged that tall buildings could play a role in supplying new commercial floorspace and housing, whilst creating an easily identifiable skyline which will complement and enhance the historic character of the town. Developing a tall buildings policy was considered desirable due to the limited supply of land in the Central Area and the potential for interest from developers who may look to bring forward proposals for tall buildings.

2. POLICY CONTEXT

a. National Planning Policy

2.1 The NPPF in Section 7 ‘Requiring Good Design’ paragraphs 56 to 68 sets out the Government’s policy in relation to design. The NPPF in Section 12 ‘Conserving and Enhancing the Historic Environment’ paragraphs 126 to 141 sets out the Government’s policy in relation to heritage assets. Policy 1 and Policy 2, building on work undertaken in commissioning and undertaking its supporting evidence base has sought to positively address the need for good design in Northampton. Specifically it has sought to relate it to...
identified circumstances and characteristics, in particular defined character areas within Northampton. The policies are considered to be entirely consistent with the NPPF; they are not too prescriptive, for instance, in terms of seeking a particular style of architecture. They do however seek to promote and reinforce local distinctiveness and recognise the importance of opportunities to draw on the contribution made to the character of the place.

2.2 Policy 1: Delivering Design Excellence provides guiding design principles applicable to all new development and localised design guidance for development in specific areas of the Central Area in Appendix A: Character Areas. Policy 3: Tall Buildings provides further design and sustainability based criteria specifically for tall building proposals to follow and adhere to.

b. Regional Policy

2.3 The Regional Plan for the East Midlands provides a general design policy for development, Policy 2: Promoting Better Design. The policy relates to the efficient use of land, improving accessibility, accounting for the local natural and historic environment, reducing climate change and minimising crime and the fear of crime.

c. Strategic Planning Policy

West Northamptonshire Joint Core Strategy (WNJCS) – Pre Submission

2.4 The WNJCS Pre Submission document, published for consultation in February 2011, contains policies BN5: The Historic Environment S10: Sustainable Development Principles to guide new development and promote sustainability and high quality design in future development proposal across West Northamptonshire.

2.5 The CAAP relies on Policy S10 as the basis to assess planning applications in the Central Area on issues such as; energy efficiency, water efficiency, BREAM and the Code for Sustainable Homes. Policy 1 of the CAAP goes into further detail, than Policy BN5, in terms of how to deliver high quality design which is sensitive to it surroundings.


2.9 The policy will contribute towards the delivery of the following Corporate Plan priorities and outcomes:

- Priority 1: Northampton on track – the promotion and preservation of the Town’s history, heritage and culture
- Priority 2: Invest in safer, cleaner neighbourhoods – a place where visitors and residents from all communities feel safe, secure and protected with low levels of crime
- Priority 3: Celebrating our heritage and culture – increased tourism; promotion, protection and improvement of our heritage and other attractions
3. EVIDENCE BASE & POLICY FORMULATION

a. Delivering Design Excellence

3.1 The following strands of evidence have been utilised alongside the planning policy context, Sustainability Appraisal and outcomes of public consultation in order to develop a justified, consistent and effective policy.

Character Area Assessment and Tall Building Strategy for Northampton’s Central Area, SPACE (2010)

3.2 In order to gain a clear understanding of the defining characteristics of the Central Area, as was formerly advised in Government's PPS1, The Character Area Assessment of the Central Area was commissioned. The Character Assessment analyses the character, distinctiveness and qualities of the townscape in Northampton’s Central Area, in order to designate character areas. The character areas have been justified through various layers of extensive macro and micro analysis of the Central Area. Macro analysis examines the Central Area holistically by assessing urban grain, building height, conservation, open space, movement and topography. Micro analysis examines the same urban design issues but at a local level within each of the Character Areas. The 10 Character Areas identified are as follows;

3.3 The Character Assessment also provides a set of generic design principles which all new development within the Central Area should adhere to. As well as providing the

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broader principles of good design the document also supplies localised urban design advice on the evolution of each character areas in the context of the existing built and natural environment, future regeneration proposals and national planning and design guidance. This locally specific design guidance provides the basis for producing the Design Aspirations Statements, which are an Appendix to Policy 1.

3.4 The Development Design Principle Drawings for each site specific policy provide indicative design guidance for each development to take into account as and when it comes forward. Each of these drawings has been produced in the context of Policy 1 and the Design Aspirations Statements Appendix.

b. Tall Buildings

3.5 The Tall Buildings Strategy uses the CABE and English Heritage Tall Buildings Guidance (2007) to define a tall building; ‘Any building or structure that break the skyline and/or which is significantly taller than its surrounding built fabric’, this definition has been taken forward in the CAAP. The Tall Building Strategy provides thorough guidance on how to ensure tall building proposals are sited in an appropriate location and built to the highest quality in terms of sustainability and urban design. Elements of this Tall Building Guidance such as the impact on views and micro climates have been used to develop Policy 2. Policy 2 does not specify areas as suitable for tall buildings as the Council wish to adopt a positive and flexible approach to dealing with all proposals, whilst still ensuring quality urban design appropriate to its context.

Conservation Area Appraisals, (Northampton Borough Council)

3.6 Each of the six Conservation Areas in the Central Area; All Saints, Derngate, Holy Sepulchre, St Giles, Boot & Shoe and Billing Road has its own appraisal and management plan. Each document provides specific guidance for owners and occupiers on how to preserve and enhance the character and appearance buildings in an area. Each document also provides a sound basis for the assessment of planning applications. These documents are a key consideration in ensuring that the new development preserves and enhances the Central Area’s heritage assets and have been referenced in Design Objective 7 of Policy 1.

CABE & English Heritage Tall Buildings Guidance (2007)

3.7 The guidance document outlines key considerations for developing Local Development Framework policies for tall buildings and in determining planning applications for tall buildings. The guidance was a starting point for devising the Tall Buildings Strategy for Northampton Central Area and Policy 2.

By Design – Urban design in the planning system towards better practice (2000)

3.8 The document states the important role that the planning system plays in promoting good urban design. The ‘Urban Design Objectives’ and ‘Aspects of development form’ sections of the document emphasise the need for local authorities to develop overarching urban design principles in making planning policies. The recommendations of this document led to the development of 8 Urban Design Objectives to be incorporated in Policy 1. The approach of defining of Urban Design Objectives has been preferred as
opposed to setting a single design standard for development to meet. This approach allows flexibility when applying Policy 1 to different cases, whilst still having an effective policy that can deliver proposals of a high standard in terms of urban design.

4. PUBLIC CONSULTATION

4.1 The preparation of the Central Area Action Plan involved a series of public consultation exercises, which have been used to progress, shape and formulate policies.

a. Issues and Options (September/November 2007)

4.2 Feedback from the Issues and Options consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
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<tbody>
<tr>
<td>• Representations support the principle of developing a series of Urban Design Principles/Objectives. Representations make it clear that development should follow pre-determined design principles to promote a step change in design standards and the overall quality of the new development across the Central Area.</td>
<td>• Policy 1 promotes a clear and robust framework of 8 Urban Design Objectives to guide new development in the Central Area.</td>
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<td>• The importance of enhancing and preserving Northampton’s historic character and heritage was a key theme running throughout representations. The need ensure new development integrates with and complements the town’s historic architecture was also a key theme highlight at the Issues and Option Stage.</td>
<td>• Urban Design Objective 7 of Policy 1 references the need to preserve and enhance the setting of heritage assets and pay regard to Conservation Area Appraisals and Management Plans.</td>
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<td>• Representations suggest that in developing tall buildings policy or in deciding planning applications for tall buildings the CABE/English Heritage’s guidance document should be a key consideration.</td>
<td>• The CABE and English Heritage Tall Buildings guidance has been a key consideration in developing Policy 2: Tall Buildings and the Character Assessment and Tall Buildings Strategy for the Central Area.</td>
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b. Emerging Strategy Consultation (August/September 2009)

4.3 Feedback from the Emerging Strategy consultation event can be summarised as follows:
Summary of Representation | Policy Response
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- Representations state the need for a clear strategy for the management of the historic environment in the town centre to be included in the CAAP. The management strategy should include: updating conservation area boundaries, improving shop frontages and encourage re use of buildings and upper floors. | - A combination of Policy 1, reviewing and updating Conservation Area Appraisals and producing a Shopfront Design Guide SPD (adopted by the Council June, 2011) will address the issue of managing the historic environment in the Central Area.

- The CAAP needs to provide design guidance for specific areas of the town to ensure new development is of a high quality in order to preserve and enhance Northampton’s heritage. | - The CAAP provides localised design aspirations for each character area in the Central Area as shown in Policy 1 and the Northampton Central Area Character Assessment and Tall Buildings Strategy.

- Representations highlight the need to protect the historic character of the town; this is an issue of paramount importance in delivering future planning policy and new development in Northampton. | - The issue of preserving and enhancing heritage assets in Northampton is a fundamental principle of national planning policy and is the focus of Strategic Objective 2 of the CAAP.

C. Pre-submission Consultation (November 2010)

4.4 Feedback from the Pre Submission Consultation event can be summarised as follows

Summary of Representation | Policy Response
--- | ---
- Disappointment that Secured by Design is not directly referenced in Policy 2. | - The issue of safe and secure design is addressed by WNJCS Policy S10, therefore it is unnecessary to repeat this in the CAAP.
To fully achieve the objectives set out within the CAAP’s vision and policies there must be an emphasis on early consultation with the relevant heritage officers within the local authorities, including archaeology at NCC.

Paragraph 4.1.5 identifies that "to achieve good design it is vital to consider the context in which development will sit" - archaeology will be part of that context. Policy 1 makes a reference to the 10 Central Area Character Areas. The character area assessment recognises the value of historical assets including archaeological features.

This section should set out those key development sites for which design codes should be provided.

Policy 1 is generic in seeking to apply across the whole of the CAAP area. Whilst design codes can assist in improving quality their formulation and application is a heavily resource intensive process. The Council at this stage cannot commit with any certainty to design codes on specific sites. Criterion 8 provides the hook for the Council to seek design codes in association with proposed development should it feel it is appropriate on any particular site.

5. SUSTAINABILITY APPRAISAL

5.1 Policies 1 and 2 will meet the following Sustainability Appraisal objectives:

- SA3: Archaeology and Cultural Heritage
- SA7: Crime and Community Safety
- SA11 & SA12: Landscape and Townscape
- SA18: Make the most efficient use of land

a. Delivering Design Excellence

5.2 In appraising Policy 1, the Sustainability Appraisal report (October 2010) concluded that its implementation will have no significant negative impacts. However, the report does reference the potential for Policy 1 to address:

- recycling and minimisation of waste during construction;
- planning for renewable energy and energy efficiency; and
- the desired BREAM and Code for Sustainable Homes Standards for new development.

5.3 All of the above issues highlighted by the Sustainability Appraisal report are addressed in the Pre Submission WNJCS. Policies S10 and BN5 of WNJCS directly

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reference these issues and are therefore applicable to all future development in the Central Area. Consequently it was deemed unnecessary and contrary to national planning policy for the CAAP to reference or repeat these policies.

b. Tall Buildings

5.4 In appraising Policy 2, the Sustainability Appraisal report (October 2010) concluded that its implementation will have no significant negative impacts. However, the report does reference the potential for Policy 2 to address:

- the need to avoid the ‘canyon effect’, created by tall buildings;
- reduce the fear of crime; and
- renewable energy generation and energy efficiency.

5.5 The issue of reducing crime by promoting better design is addressed in part by Policy 1 of the CAAP and the need to include specifics on energy efficiency in Policy 2 is addressed by Policy S10 of the WNJCS. Policy 2 addresses the need for development proposals for tall buildings to provide an impact assessment of local climate conditions, views etc. It is considered that this would include ‘the canyon effect’. The Tall Building Strategy for Northampton Central Area can also provides further detail on these issues.

6. POLICY DELIVERY

6.1 Planning applications will be accompanied by a Design and Access Statement to ensure that proposals meet the Promoting Design Excellence criteria in Policy 1 and Policy S1 of the WNJCS. Proposals for tall buildings should meet the additional design criteria in CAAP Policy 2, and look to follow the further guidance provided in Tall Building Strategy and the CABE/English Heritage guidance.

6.2 The key organisations in ensuring these policies are delivered Northampton Borough Council, West Northamptonshire Development Corporation, English Heritage and the Police Liaison Officer.

7. CONCLUSIONS

7.1 The Urban Design Objectives brought forward through Policy 1 of the CAAP promote high quality inclusive design in the Central Area. These design principles are borne from: representations from public consultation and various strand of design guidance listed in the technical evidence base above. The Character Area Assessment designates 10 character areas within the Central Area and provides design guidance for the future evolution of each character area. The Character Areas and the subsequent design guidance have been incorporated in Policy 1, and its Appendix, to ensure that CAAP provides localised design guidance.

7.2 Policy 2 is based on guidance in The Character Assessment and Tall Building Strategy of Northampton’s Central Area (Space, 2010) and the CABE & English Heritage Tall Buildings Guidance (2007). Policy 2 seeks to ensure that proposals for tall buildings are of the highest quality in terms of urban design and sustainability, whilst still been appropriate to their immediate and wider surroundings. To avoid policy repetition, Policy 1 and 2 are to be used in conjunction with each other when appraising proposals for tall buildings.
1. INTRODUCTION

1.1 This paper provides the background information to the public realm policies contained in the Central Area Action Plan. It draws together the evidence base, which has been used to direct policy formulation.

1.2 The quality of the public realm in Northampton’s Central Area is vital to creating an environment that people want to live in, work and visit. Most people’s perception of an area is affected by their experience of the street environment and public realm.

1.3 Northampton Central Area has a rich townscape and architectural legacy which has evolved slowly over time, but with much of its mediaeval origins still intact. However, the overall impression of public realm in the Central Area appears tired and not easy to navigate, which detracts from the overall environment.

1.4 The Council aims to protect and improve the public realm in the Central Area in order to make the area more attractive and welcoming and to attract inward investment, whilst enhancing local distinctiveness. In order to achieve this, it is important to improve the appearance and functional quality of the existing public realm to a high standard. At the same time, it is also essential to ensure that the public realm created through new development is provided to a high quality, complementing Northampton's local distinctiveness and adding a new layer of history.

1.5 The public realm policy within the CAAP sets out the mechanisms which the Council expect to be employed in delivering an enhanced public realm. It also contains the areas where new public spaces will be required as part of future development proposals.

2. PLANNING POLICY CONTEXT

a. National Policy

National Planning Policy Framework

2.1 The NPPF sets out ‘planning for places’ as one of the key principles of sustainable development that the planning system should aim to deliver. It means using the planning system to protect and enhance our natural, built and historic environment. The NPPF in Section 7 ‘Requiring Good Design’ paragraphs 56 to 68 sets out the Government’s policy in relation to design. The NPPF in Section 12 ‘Conserving and Enhancing the Historic Environment’ paragraphs 126 to 141 sets out the Government’s policy in relation to heritage assets. Policy 3 within the CAAP seeks to achieve the requirements of the NPPF within the Central Area through the Public Realm Implementation Framework.
b. Regional Policy

2.6 The *East Midlands Regional Plan (March 2009)* requires all new development in the East Midlands aspire to the highest standards of design and construction, in order to achieve sustainable development.

2.7 Policy 1 in the CAAP promotes high quality design which supports safety and vitality and benefits the quality of life of local people as Policy 2 Promoting Design Excellence in RSS8 requires.

c. Strategic Policy

*West Northamptonshire Joint Core Strategy (WNJCS) Pre Submission (February 2011)*

2.8 Policy S10 provides further guidance on assessing planning applications in the Central Area on issues related to Public Realm such as; quality and source of materials, design including safety and security and accessibility to services and facilities. Policy 3 of the CAAP defines where the principles of policies BNS, N1, RC1 and N11 will be prioritised within the Central Area.


2.9 This policy will contribute towards the following priorities and outcomes contained in the Corporate Plan:

- Priority 1: Northampton on track – increased numbers of visitors
- Priority 2: Invest in safer, cleaner neighbourhoods – a clean Town with neighbourhoods that are tidy and well maintained; a place where visitors and residents from all communities feel safe, secure and protected with low levels of crime
- Priority 3: Increased tourism

3. EVIDENCE BASE AND POLICY FORMULATION

a. Technical Studies

3.1 The following strands of evidence have been utilised alongside the planning policy context; which includes Sustainability Appraisal and public consultation in developing a justified, consistent and effective policy.

*Central Area, Design and Development Framework (BDP & CBRE November 2006)*

3.2 The objective of this document was to bring forward a Masterplan that will deliver a design, development and movement framework (DDMF) to help guide investment in the Central Area until 2021. In the absence of an up to date plan it sought to provide a strategic vision for the Central Area taking into account a vision for West Northamptonshire. The aim of the document was to influence and enable investment decisions to be developed in advance of the adoption of the Northampton Central Area Action Plan. It includes the public realm strategy that brings forward the overall design philosophy which aims to create a unifying and attractive image for Northampton. It also includes the street hierarchy which forms the basis for the development of a design palette for various elements within the Central Area’s public realm. It emphasises the Market
Square, The Cross, The Waterways, Abington Street, and Approach Corridors as the important streets in terms of public realm. This document influenced the Public Realm Implementation Framework, as well as relevant Masterplans which have been taken into consideration in formulating Policy 3.

Public Realm Implementation Framework (PRIF) (ATKINS, BDP & MVA Highway, October 2007)

3.3 PRIF was commissioned by NBC in partnership with WNDC, NCC and English Partnerships. It was produced in order to guide future area action plans and supplementary planning documents. It provides clear guidance on the selection, design, installation and management of Northampton's public realm as well as its historic preservation. It covers part of the Central Area and provides a clear and consistent approach in developing the public realm with regards to surfacing materials, lighting, signs, street furniture, trees, planting and public art. It has a two layer approach to the public realm, based on street typology, and also a palette of appropriate materials, with the highest quality being provided in the most important streets. These street typology and palette plans have been produced based on the design philosophy outlined in the Central Area, Design and Development Framework.

3.4 The guidance in the PRIF is based on a robust study and analysis of physical, cultural, social and economic elements of the Central Area. It helps to deliver high quality and locally distinctive public realm, helping to achieve sustainable development. The PRIF is considered to be an appropriate tool to guide future changes to public realm within the Central Area.

3.5 There is a need to review this document taking into account its effectiveness and also the need to extend the study area to cover the whole of the Central Area defined by the CAAP. Once this document is updated it will be published as a supplementary planning document. Meanwhile, this document is going to be used as a tool to apply the design concept of public realm outlined in the Central Area, Design and Development Framework.

Town Centre Health Check (Roger Tym & Partners, October 2009)

3.6 The Town Centre Health Check found that in general, the Central Area provides a safe environment but the overall impression of public realm looks tired, although maintained to an acceptable standard. The shop fronts and façades throughout town are slightly run down, and the Grosvenor Centre is mentioned as particularly dated. There is a decent amount of street furniture, such as benches and bins, but most aspects of the public realm appear to have suffered some damage, particularly in Abington Street which contributes substantially to the impression of negative environment. The regeneration of the Market Square is found to have potential to improve the situation of Public Realm in the Central Area. This study helped identify the existing condition of public realm and identified locations that require significant improvement to the public realm.


3.7 One of the strategic objectives of this Masterplan is to create high quality buildings and public spaces. In recognition of the importance of the setting of Northampton’s Waterside, this Masterplan included proposals for new public spaces which take advantage of the Waterside setting, and provide locations for leisure uses, bringing activity
to the local water environment. High quality development is proposed which frames the public spaces and, where necessary, reinforces the identity of the Waterside at key locations, to improve the pedestrian environment. The locations of the proposed public spaces are: Waterside St Peters, Waterfront at Avon site and Waterside Southbridge West which helped identify the locations of new public places in Policy 3.

**St John’s Masterplan Taylor Young (with Lambert Smith Hampton - February 2008)**

3.8 The Masterplan was commissioned jointly by Northampton Borough Council, West Northamptonshire Development Corporation and Northamptonshire County Council.

3.9 The Masterplan proposes significant new development and transformation across the south of the town centre and the Bridge Street corridor. It includes major changes to the transport network and the creation of new public spaces. The St Johns area is expected to become the focus for the new cultural quarter. It proposes high value innovative workspace, niche retail, commercial offices and quality restaurants. This fronts onto high quality public realm, including a new public space in front of the Royal & Derngate Theatre and identifies the opportunities for locating bar/restaurant uses at ground floor to animate these spaces and extend visits.

3.10 The Masterplan also includes the Angel Street area which is expected to become the focus for new commercial office space. Most of this is provided on the existing Angel Street car park site, surrounding a new courtyard public space. This Masterplan provides the basis for the identification of new public spaces highlighted in CAAP Policy 3.

4. **PUBLIC CONSULTATION**

4.1 The preparation of the Central Area Action Plan involved a series of public consultation exercises, which have been used to progress, shape and formulate policies.

a. **Issues and Options (September – November 2007)**

4.2 Feedback from this consultation event can be summarised as follows:

**Safety**

4.3 Safety around the Central Area was felt to need improvement. Measures that could be taken include improving existing public spaces; providing better street lighting and providing more green space. Another key area with safety issues was Abington Street. Measures suggested to improve safety included better lighting, CCTV, increased Police and Community Support Officer presence, removal / improvement of covered walkways and underpasses.

**Quality of public realm in Abington Street**

4.4 Improvement of public realm along Abington Street was also raised. It was suggested that Abington Street should be an open air showcase for the Central Area linking the street with existing and proposed anchors, providing space for fairs, entertainers, performance space and temporary markets. To achieve this, the public realm needs renewal, appropriate surfacing, planting and street furniture, and enhancing the street's position at the heart of the town's statue trail, which runs from Abington Square.
Lack of street plantings

4.5 A greener town centre is also highlighted which suggested more street planting within the Central Area.

b. Emerging Strategy Consultation (August/September 2009)

4.6 Feedback from the Emerging Strategy consultation event can be summarised as follows:

Movement

4.7 It was highlighted that connectivity within the Central Area should be a key requirement, ensuring ease of movement between key locations. In particular connectivity should be improved between Castle Station and the Central Area. Accessibility was also raised across the Horse Market, Upper Mounts and St Peter's Way.

Lack of green open space

4.8 Lack of green open space was recognised and more street planting was suggested.

Quality of street furniture

4.9 It was felt that within the Central Area there was not enough seating especially around a prime shopping area. The quality of public realm was considered to be poor and particularly Market Square and Abington Street which require significant improvement.

Safety

4.10 Public safety was also recognised as an issue in need of addressing. The need was seen to improve natural surveillance and visibility for pedestrians with well lit, accessible routes and a better designed public realm which would contribute to additional pleasure on the street.

c. Pre-submission draft (November/December 2010)

4.11 With regards to Policy 3, Legal and General (L&G) made a representation to the viability of following the specific approach identified in the Public Realm Implementation Framework. L & G consider that the Grosvenor Centre should be deleted from table C.1 Public Palette Zones as the design of the public realm in the Grosvenor Centre should not be specified in advance of this.

5. SUSTAINABILITY APPRAISAL

5.1 The Sustainability Appraisal report concluded that:

- Policy 3 will have no significant negative impacts. A minor negative impact is predicted in relation to waste, as the policy does not refer to waste recycling during construction and the incorporation of waste recycling facilities into areas of public
realm during their operation. Negative impacts are also recorded in relation to archaeology and water.

- A significant positive impact is identified in relation to material assets. Minor positive impacts are identified in relation to crime and community safety, energy and climate, health and well-being, and landscape/townscape. No uncertain impacts are recorded.

5.2 The report suggested mitigation and enhancement measures to include specific reference to enhancing the setting of Northampton’s historic town centre and cultural heritage assets. Reference should be made to ensure that public realm improvements are undertaken in a way that improves public safety. Policy 3 specifies the areas that are prioritised for major improvement to the existing public realm. One of the prioritised areas is Market Square / Grosvenor Centre Development Site which provides the heart of the historic central area. Policy 3 references Policy 17 (Grosvenor Centre Redevelopment) and Policy 31 (Market Square) which include proposals to enhance historic assets and setting. In terms of public safety, the guidance in PRIF (which Policy 3 refers) was produced taking into account public safety issues.

5.3 The report also suggests making reference to the introduction of green infrastructure and bio diversity features to reduce the threat of flood risk and maintain water quality. Reference is also made to providing a network of green infrastructure through public realm improvement. The Council consider policies 4 (Green Infrastructure) and 5 (Flood Risk and Drainage) of the CAAP to provide guidance in relation to these issues. Urban green space will primarily be delivered through the requirements of the PRIF.

5.4 One of the mitigation measures that is suggested by in the SA is to include reference to waste recycling during construction and incorporation of waste recycling facilities into areas of public realm during their operation. This recommendation is noted but it is not considered necessary to include the level of detail in the Plan because these are requirements that will form part of the consideration to be given when the proposal progresses.

6. POLICY DEVELOPMENT

6.1 Both evidence bases and public consultation identified issues with the existing public realm in the Central Area which need to be addressed. The key issues concern improving the quality of the public realm, addressing the lack of public space and providing a pleasant environment that people wish to occupy in the Central Area. Policy 3 in the CAAP aims to address these key issues by identifying areas within the Central Area where major public realm improvement and new public spaces will be created, and by providing design principles that future changes to the public realm should adhere to.

6.2 The policy direction for improving the public realm is influenced by the design philosophy outlined in the Central Area, Design and Development Framework. It highlights the importance of public realm improvements at key locations according to the appropriate design concept which contributes to creating a unifying and attractive environment for Northampton. The PRIF has incorporated the design philosophy and concept, and developed clear guidance on the selection, design, installation and care of Northampton’s public realm. It provides a consistent approach to dealing with the public realm with regards to surfacing materials, lighting, signs, street furniture, trees, planting and public art. The street typology and palette plans have been developed based on this design
concept and help to enhance the importance of particular streets and spaces, improving connectivity and addressing the overall quality of public realm.

6.3 The public realm policy within the CAAP will use the design principles outlined in the PRIF as a tool to guide new development and public realm improvement schemes within the Central Area.

6.4 The guidance in the PRIF is based on a robust study and analysis of the central area and helps to deliver high quality and locally distinctive public realm that assists in achieving sustainable development.

6.5 Abington Street, Market Square and Grosvenor Centre Development sites will be given priority in seeking to improve the existing public realm. They have been identified as priority areas by the Central Area, Design and Development Framework and the PRIF. This was also supported by consultation feedback. The locations for new public spaces have been promoted in the Waterside and St John’s Masterplans.

6.6 The policy discounted Waterside Southbridge West as a location for a new public space, despite the fact that it was recommended for this use in the Waterside Masterplan. This is because there was considered to be insufficient evidence to ensure that this development would be delivered within the timescale of the CAAP. Other proposed sites have already had either a development agreement signed or demonstrated commitment by securing funding mechanisms or undertaking a compulsory purchase order.

6.7 Policy 3 will help achieve Strategic Objectives 2, 4 and 6 of the CAAP by promoting locally distinctive and high quality public realm that can blend in with the Northampton’s historic built environment, promoting connectivity and legibility through the street hierarchy and providing a typology, and safer environment through good design of the public realm.

6.8 The policy 3 will be delivered through partnership working with the private sector and public sectors such as Northamptonshire County Council and West Northamptonshire Development Corporation.

7. DELIVERY

7.1 Improvements to the public realm will be delivered through new public spaces provided within future development by partnership working with private and public sectors; from developer contributions, either single development related or combined; and from other public sector funds examples of which are Local Transport Plan spending and Growth Area Funds.

7.2 Specific and detailed delivery measures are covered by the individual site specific technical papers as follows.

- Abington Street: Policy 17 (Grosvenor Centre Redevelopment Site)
- Market Square: Policy 30 (Market Square)
- Grosvenor Centre Development Site: Policy 17 (Grosvenor Centre Redevelopment Site)
- Angel Street: Policy 21 (Angel Street)
- St John’s: Policy 20 (St John’s)
• **Waterside Brampton Branch St Peters Way:** Policy 26 (Waterside Brampton Branch St Peters Way)
• **Waterside Avon/ Nunn Mills/ Ransome Road:** Policy 28 (Waterside Avon/ Nunn Mills/ Ransome Road)

7.3 The Public Realm Implementation Framework will be reviewed and updated in terms of its effectiveness and as well as addressing comprehensive coverage of the Central Area. The review will also take into account greening the Central Area and the need to address surface water management which currently lacks capacity within the combined sewer network. The document will be adopted as a Supplementary Planning Document once completed.

8. **CONCLUSION**

8.1 CAAP Policy 3 aims to address key issues concerning the existing public realm in the Central Area. These are identified as quality of public realm and lack of public space. By addressing these issues, the policy will help achieve the CAAP’s strategic objectives, the objectives of the Council’s Corporate Plan and also the visions of the relevant strategic policy framework.

8.2 Evidence bases and public consultation have assisted in identifying the areas that should be prioritised for major improvement to the existing public realm and locations for new public spaces.

8.3 The CAAP public realm policy will use the design principles outlined in the PRIF as a tool to guide new development and public realm improvement schemes within the Central Area. The design principles in the PRIF are based on a robust study and analysis of physical, cultural, social and economic elements of the Central Area.

8.4 Policy 3 will be delivered as part of the development of each of the strategic development sites through partnership working with private and public sectors.
POLICY 4: GREEN INFRASTRUCTURE

1. INTRODUCTION

a. Context

1.1 Green infrastructure is a strategically planned network of multi-functional green space, open space and other environmental assets. High quality, well-maintained green infrastructure can enrich the quality of lives of residents and visitors, and increase biodiversity levels. Green Infrastructure within the Central Area predominantly falls into the following categories:

b. Green Corridors (rivers, canals, cycle routes and public pathways)

1.2 The River Nene, its Brampton Arm and the Grand Union Canal run through the Central Area, along the western and southern boundaries. These green corridors are an asset to the Central Area. At present, although they provide a biodiversity and recreation resource, these are under maintained and underutilised in terms of providing public access, their biodiversity potential and an attractive setting for new development.

1.3 The River Nene corridor is currently in part of low environmental quality, with an urban character comprising steep retaining walls and embankments. The requirement to provide flood defences together with a relatively unsympathetic approach to the river’s edge meant that it performs more as a functional and obviously heavily engineered river edge. New developments which took place within the area did not capitalise on this corridor through the provision of a clear and defined frontage that positively addressed the water’s edge setting. Signage, quality of paths for cyclists and pedestrians and levels of maintenance is inconsistent. Policy within the CAAP has the opportunity address these issues and maximise the opportunity offered by the river and canal.

c. Open Space

1.4 The Central Area possesses a good distribution of attractive and publicly accessible open spaces including Becket’s Park and Barnes Meadow Local Nature Reserve. However, the links between these open spaces could be improved, allowing the Central Area to integrate with wider Northampton and beyond.

1.5 Although the Central Area is predominantly urban in character, it still contains a variety of open space, sport and recreation provision. These open spaces can contribute significantly to a healthier and sustainable lifestyle for what will be an increasing population both within the Central Area and wider town and will therefore require better integration, maintenance and enhancements.

1.6 The following areas of open space are located within the Central Area:
### Northampton: Open Spaces

<table>
<thead>
<tr>
<th>Parks and gardens</th>
<th>Becket’s Park and Delapre Estate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural open spaces</td>
<td>Barnes Meadow, Foot Meadow, Island between River Nene and Nene Valley Way, and St Andrews Road</td>
</tr>
<tr>
<td>Amenity green spaces</td>
<td>x 13</td>
</tr>
<tr>
<td>Children’s play area</td>
<td>Becket’s Park Play Area</td>
</tr>
<tr>
<td>Outdoor sports facilities</td>
<td>Becket’s Park Tennis Courts, Becket’s Park OSF, Spring Lane Primary School and St Georges Middle School</td>
</tr>
<tr>
<td>Cemeteries and churchyards</td>
<td>Holy Sepulchre Churchyard, Notre Dame Nuns Burial Ground, St Giles Churchyard, St Katherine’s Memorial Square and St Peters Churchyard Marefair</td>
</tr>
</tbody>
</table>

#### d. Urban Green Space (street trees, verges, gardens and green roofs)

1.7 The introduction of new urban green space will help Northampton adapt to and mitigate the effects of climate change whilst enhancing levels of biodiversity.

1.8 Opportunities to develop new provision of urban green space in the Central Area are relatively limited. Therefore retrofitting green infrastructure into existing urban development should be considered where possible. Opportunities will exist either as part of new development or retrofitting for green roof systems and roof gardens, green walls, trees, swales integrated as part of streetscape and traffic calming schemes, or neighbourhoods play areas.

1.9 Green roofs and sustainable drainage in particular can make a unique contribution towards the quality of the Central Area’s environment. They assist by mitigating the urban heat island effect and reducing surface water run-off by retaining moisture and moderating the discharge to street drainage. In addition, they provide habitat and shelter to wildlife. Additional tree planting can also help mitigate the effects of climate change by providing shade and reducing surface water run off.

#### e. Special Protection Area

1.10 The Upper Nene Valley Gravel Pits Special Protection Area (SPA) is located 900m away from the eastern boundary of the Central Area. The Appropriate Assessment screening document, which accompanies the CAAP, assesses the potential impact of the implementation of CAAP policy on the SPA in accordance with the EU Habitats Directive.

#### 2. PLANNING POLICY CONTEXT

##### a. National Planning Policy

2.1 The NPPF in section 10, “meeting the challenge of climate change, flooding and coastal change” paragraph 99 highlights the role that Green Infrastructure can have in positively addressing these issues. It also in paragraph 114 looks for Plans to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
b. Regional Policy

2.2 Policy 28 of the Regional Plan for the East Midlands (RSS8) stresses the need for local authorities to ensure the delivery, protection and enhancement of environmental infrastructure. It also states the need to increase the public’s access to green space without increasing the pressure on sensitive sites, especially those designated under the European Habitats Directive.

c. Strategic Policy

Pre Submission West Northamptonshire Joint Core Strategy (WNJCS), (February 2011)

2.3 Policy BN1 identifies green infrastructure corridors of sub-regional importance; this includes The Nene corridor and The Brampton Arm corridor. In addition, the policy aims to conserve, manage and enhance green infrastructure into the future.

2.4 Policy BN4 aims to preserve and enhance / manage impacts of new development on Upper Nene Valley Gravel Pits SPA and should be read in conjunction with the CAAP’s Waterside Policy.


2.5 This policy will contribute towards the following priorities and outcomes:

Priority 2: Invest in safer, cleaner neighbourhoods – a place where people want to visit and enjoy our parks and open spaces
Priority 3: Celebrating our heritage and culture – increased tourism
Priority 7: Promoting health and well being – improved public health

3. KEY EVIDENCE BASE AND POLICY FORMULATION

3.1 The formulation and development of Policy 4 have been informed by the following technical evidence base, public consultation exercises and the sustainability appraisal.

The Open Space, Sport and Recreation Needs Assessment and Audit (PMP, 2009)

3.2 Completed in accordance with the requirements of Government policy at the time set out in PPG17, this assessment / audit outlines the current provision and recommended provision standard for all open space typologies across Northampton. The audit identifies and categorises the type and role / function of all open space, as found on the CAAP Proposals Map.

3.3 The study concluded that from a quantity standard perspective, there is a shortfall in the provision of parks and gardens, children’s play areas, provision for young people and allotments. In terms of accessibility, there are deficiencies in allotments, provision for children and young people and natural and semi-natural open space. Although the opportunities to create new open spaces in the Central Area are limited, there are opportunities to enhance and improve the functions of existing provisions. This can be done by capitalising on the River Nene, the canal and the larger existing open spaces such as Becket’s Park and Midsummer Meadow.
This report analyses opportunities to enhance existing green infrastructure provision in Northampton. Key green infrastructure routes containing Primary Movement Networks, habitat corridors and Open Space sites were identified.

3.5 The key green infrastructure routes are as follows:

- The Nene Valley
- The Brampton Valley
- Brampton Valley – Althorp Park via Dallington Heath
- Northampton town centre – Salcey Forest

3.6 The study provides recommendations on how movement linkages can be improved between key sites, enhance connections and improve design and interpretation. These recommendations include detailed proposals connecting sites within the Central Area, like Becket’s Park, with areas surrounding the Central Area and the rest of Northampton.

3.7 Policy 4 signposts the need to enhance and preserve existing green infrastructure, particularly within the Waterside area, in accordance with the key green infrastructure routes. Site specific policies for the also aid the delivery of green infrastructure improvements.

4. PUBLIC CONSULTATION

4.1 The Council embarked on a series of public consultation exercises, which relate to the milestones of the plan preparation process. Each stage of the consultation process provided an opportunity to engage with consultees both in terms of the plan itself and also to assist in policy formulation. Below are the key outcomes from the various stages of the consultation process leading up to Submission.

a. Issues and Options (September / November 2007)

4.2 Feedback from the Issues and Options consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representations</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strong support for the retention of all open spaces and trees in the Central Area.</td>
<td>Policy 4 aims to enhance and preserve green infrastructure and its setting throughout the Central Area.</td>
</tr>
<tr>
<td>The importance of green infrastructure should be promoted at a local and sub regional level.</td>
<td>Strategically important green spaces have been identified in CAAP, various CAAP evidence base documents and the West Northamptonshire Joint Core Strategy.</td>
</tr>
</tbody>
</table>
b. Emerging Strategy Consultation (August / September 2009)

4.3 Feedback from the Emerging Strategy consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representations</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Green spaces in the town are currently underutilised in particularly the Waterside. It was highlighted that this in turn would have a negative effect on biodiversity levels.</td>
<td>• Policy 4 and the CAAP Proposals Map identify the role and function of open space in the Central Area.</td>
</tr>
<tr>
<td>• Improve the links between the waterside and other areas of green space such as Delapre Park and Victoria Park.</td>
<td>• The need to improve links between open space and the overall connectivity of green infrastructure in the Central Area is reflected in Policy 4 and various sites specific policies.</td>
</tr>
</tbody>
</table>


c. Pre-submission Consultation (November 2010)

4.4 Feedback from the Pre Submission Consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representations</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The implementation of CAAP policy will result increased activity on the open space in the Waterside area. This will increase the pressure on biodiversity and the habitats of species.</td>
<td>• The provision to ‘enhance biodiversity’ as part of any new development referenced in Policies 4 and 25, coupled with the effective monitoring of these policies is considered sufficient.</td>
</tr>
<tr>
<td>• The wording stating that new developing ‘must’ deliver on / off site contribution towards green infrastructure provision, is considered inappropriate and should be amended to ‘where possible’.</td>
<td>• The policy provides clarity, circumstances on each particular site will dictate where it will be clear that this might not be possible.</td>
</tr>
<tr>
<td>• As the CAAP is pre empting the WNJCS there maybe a lack of continuity in terms of the identification of green infrastructure of strategic importance.</td>
<td>• The WNJCS has now reached Pre-Submission stage, the plan identifies strategically important green infrastructure running through the Central Area. The CAAP conforms with the WNJCS on this issue and in part shares the same evidence base.</td>
</tr>
<tr>
<td>• Policy 4 should make reference to flood risk and water</td>
<td>• It is considered that there is</td>
</tr>
</tbody>
</table>
management.

- Water attenuation should be referenced in Policy 4.
- The CAAP should make provision for community gardens and allotments.

- The CAAP has no strategic context as it has been published before the WNJCS. In addition, policy direction on biodiversity needs to be clarified, and an Appropriate Assessment and A Sustainability Appraisal should accompany the CAAP.

- These objections have been withdrawn as an Appropriate Assessment and a Sustainability Appraisal was published alongside the CAAP. In addition, the pre-submission WNJCS has been published and provides a strategic context on green infrastructure and biodiversity. It was also agreed that changes to the monitoring arrangements for Policy 5 relating biodiversity would provide the needed policy direction.

5. **SUSTAINABILITY APPRAISAL**

5.1 In appraising Policy 4, the Sustainability Appraisal report (October 2010) concluded that its implementation will have no significant negative impacts.

5.2 The report predicted that Policy 4 will have significant positive impacts in relation to energy and climate, and landscape/townscape. Minor positive impacts are predicted in relation to archaeology, cultural heritage, material assets, biodiversity, crime and community safety, health and well-being, soil, geology, land use and water.

5.3 However, the report does reference the potential for Policy 4 to:

- use the green infrastructure network to help to meet biodiversity targets and to increase habitats for important species in Northampton.
5.4 It is considered that with amendments to the monitoring arrangements for Policy 5 the suggested amendment, above, can be included in the CAAP.

6. POLICY DELIVERY

6.1 The Council will continue to work with developers, to secure developer contributions to mitigate the impacts of new developments. There are also opportunities provided through the work of River Nene Regional Park, the Environment Agency and the Wildlife Trust in obtaining additional funding. This will be in association with projects such as the Regional Park, the Nene Catchment Management Plan, and the Nene Implementation Area, which have dedicated funding and the opportunity to bid for additional funding as and when they come along. In addition, the Council, together with the adjoining authorities of South Northamptonshire and Daventry proposals, will be seeking contributions through a Community Infrastructure Levy for a range of infrastructure requirements which will be generated by the proposed new developments. This will allow the Council in conjunction with key partners to deliver improvements to the green infrastructure network at the earliest opportunity.
1. **INTRODUCTION**

**Context**

1.1 The Central Area is located in the Nene valley. The Nene and its tributaries mean that much of the area, particularly in the south and west lies within the historic flood plain. The Northampton Arm of the Grand Union Canal also flows through the area. The town has periodically suffered from severe flood events, and one of the worst in living memory was in Easter 1998. Since 1998, significant investment in flood defences has been made and as well as improved flood warning arrangements throughout the town. The design standard for the flood defences for the town is for a 0.5% probability (1:200 chance of occurring in any year) event with an allowance for climate change. This standard is applied across the whole of the Upper Nene Catchment. This provides one of the highest levels against river flooding in the country. However, defences do not remove the ‘residual risk’ of flooding and areas that benefit from defences remain at risk of flooding in the event of failure or overtopping of defences. Accordingly, an appropriate policy approach to minimise the risk and maximise the protection of the town is vital.

1.2 Furthermore, fluvial flooding is not the only source of flooding that requires a policy response. Within the Central Area, in some places there is a risk of surface water flooding, particularly during extreme rainfall events. In addition it is recognised that there are potential capacity constraints within the existing sewerage system. For large parts of the Central Area surface and foul water share the same sewers, through combined sewers. This in peak rainfall events currently causes foul sewerage to enter the river directly through overflows. This is an issue that needs to be satisfactorily addressed when considering the future development of the Central Area. Since the enactment of the Flood and Water Management Act (2010), Northamptonshire County Council (NCC) has responsibility for developing a strategy to manage local flood risks, involving flooding from surface water, ordinary watercourses, groundwater and small reservoirs. Legislation when enacted (assumed to be October 2012 or April 2013) will give NCC responsibility for agreeing and adopting SuDS systems to deal with surface water. A Northampton Surface Water Management Plan is currently being developed by NCC.

1.3 Without appropriate mitigation, the potential risk from flooding could increase by development of sites throughout the Central Area. Careful management of development risks is required to respond to the need to develop adequate surface water and sewerage infrastructure as well as ensuring that all sites are developed in a manner that minimises the risks to people and property from flooding. National Planning Policy seeks to ensure that, wherever possible, development will not be located in areas at risk of flooding. However, the regeneration of underused sites within the river valley and historic floodplain gives rise to the need to promote development within a regime of carefully managed risk.
1.4 Since 1998, and with other legislation being enacted, there is increasing pressure to manage surface water at source of generation. There are a series of on-site solutions, such as large balancing ponds/lakes, that may not be appropriate for a built up urban location, whereas other methods such as green roofs, on site attenuation, grey water recycling/harvesting in conjunction with off-site strategic attenuation may be a better solution. The policy is aimed at deploying such measures to ensure that wherever possible, the flows to the existing combined sewer network will not exacerbate problems related to sewage outfall and ideally creates additional capacity within the existing combined network for foul water by separating foul and surface water.

1.5 This paper provides the background information to the Flood Risk and Drainage policy. It draws together the evidence base, which has been used to direct policy formulation.

2. PLANNING POLICY CONTEXT

a. National Planning Policy

2.1 The NPPF in section 10, “meeting the challenge of climate change, flooding and coastal change” addresses flood risk. Paragraph 100 highlights the role that planning should play in seeking to development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Subsequent paragraphs outline what planning authorities should do to ensure that flood risk is not increased.

b. Regional Policy

Anglian River Basin Management Plan (2009)

2.7 The Environment Agency is seeking improvement in the Anglian River Basin District by means of river basin management, which is a continuous process of planning and delivery. It has worked extensively with local stakeholders to identify the actions needed to address the main pressures on the water environment.

2.8 The Management Plan contains specific details for the River Nene, which is the principal river that flows through the Central Area. It highlights the large discharges that are made via the Waste Water Treatment Works, the pressure on the river because of growth and, overall the good ecological status of the river.

2.9 In its section on the Water Framework Directive and the implications on the plan-making process it highlights the need for:
   - Ensuring planning policies and spatial planning documents take into account sustainable water management objectives
   - Ensuring that local spatial planning policies for new development set out strong requirements for water efficiency and quality measures

River Nene Catchment Flood Management Plan (CFMP) (September 2009)

2.10 The role of CFMPs is to establish flood risk management policies, which will deliver sustainable flood risk management for the long term. The Plan contains specific options
for the ‘Northampton Central’ (which covers the CAAP boundary) and ‘Northampton Outer’ area.

2.11 The four key messages for the Northampton Central sub-area of the CFMP are:

- Where possible, future flood risk should be managed by storing water on the floodplain upstream of settlements at risk.
- Any redevelopment of floodplain areas is an opportunity to increase their flood resilience.
- Organisations must work together to provide an integrated approach to urban drainage issues and surface water flooding.
- Flood awareness plans will be used to manage the consequences of flooding.

2.12 The CFMP also encourages planners to develop policies for new development and regeneration to incorporate resilience measures so that the location, layout and design can help to reduce the risk of flooding. It also encourages the use of measures in PPS 25 to ensure that new development does not increase the risk of flooding to existing development. Finally, it specifies that, “Any new development or regeneration should provide opportunities to improve the river environment and make space for water”. This has clear links with the Water Framework Directive and the requirement to improve water quality.

East Midlands Regional Plan GOEM (March 2009)

2.13 Policy 32 – A Regional Approach to Water Resources and Water Quality of the Regional Strategy emphasises the need for water related issues to be taken into account in the process of identifying land for development e.g. by means of water cycle studies, which have carried out for West Northamptonshire. The need for the more efficient use of the water supply is stressed by means of e.g. reducing leakage, additional infrastructure, sustainable drainage and the provision of adequate sewage treatment capacity, in parallel with improving water quality. These aspects have all been carried forward in the policy process for West Northamptonshire and Northampton.

2.14 Policy 35 – A Regional Approach to Managing Flood Risk of the Regional Strategy requires local authorities, the Environment Agency and water suppliers to respond to the impact of climate change on flooding and drainage. The LDF process needs to be informed by Assessments, which have been undertaken to date (specify what SFRAs and WCSs have been undertaken by way of an introduction to the next sections) and policies aimed at the prevention of inappropriate development (by means of the application of PPS25 sequential and exception testing on potential development sites). Responses to efficient resource management e.g. Sustainable Drainage Systems also need to be rigorously encouraged. All these aspects have been pursued in the West Northamptonshire and Central Area Action Plan preparation and evidencing.

Floods and Water Management Act 2010

2.15 Forward planning is being carried out under the Floods and Water Management Act 2010. Northamptonshire County Council is the Lead Local Flood Authority (LLFA) for local Flood and Water Management. This responsibility includes:
• Developing, maintaining and applying, in consultation with key stakeholders, a Local Flood Risk Management Strategy for Northamptonshire which will include risks from surface water run-off, groundwater and ordinary watercourses.

• Establishing local management and governance arrangements with other key stakeholders to ensure delivery of effective joined up management of flood risk.

• Fulfilling the requirements of the EU Floods Directive by completing a Preliminary Flood Risk Assessments and preparing Surface Water Management Plans for areas of greatest risk.

• Approving, adopting and maintaining Sustainable Drainage Systems (SUDS) that meet National Standards for development.

• Establishing and maintaining a register of flood risk management assets with a record of each structure, together with details of ownership and state of repair and where appropriate the designation of such structures or features, which may affect a flood risk.

• Investigating flooding incidents, to the extent we consider necessary, in order to understand their cause and ensure that appropriate agencies play their role in the effective management of flooding incidents and recovery.

• Responsibility for the co-ordination of flood risk management across the county.

2.16 However, Northampton Borough Council retain their powers under the Land Drainage Act. This means that the Borough has powers to prevent, mitigate and remediate flood damage for ordinary watercourses, and for managing flood risks as set out in existing planning laws. In addition to these existing powers, the Borough Council has three new duties under the Flood and Water Management Act:

• Duty to act consistently with local and national strategies
• Duty to cooperate with other flood risk management authorities
• Duty to develop sustainably

2.17 These duties need to be carefully considered both in plan making and when taking decisions on specific development sites, such as those allocated within the Central Area Action Plan.

**DEFRA: Sustainable Drainage Standards (Consultation)**

2.18 The National standards for Sustainable Drainage have been released for consultation until March 2012. The standards set out the minimum requirements for sustainable drainage solutions within England and Wales to allow them to be approved by the SuDS Approval Body (SAB (Northamptonshire County Council)).

2.19 The standards require SuDS to be considered at the earliest stage of site selection and that water is managed on the surface and at source where it is practical to do so. The use of public land, such as car parks and parks is strongly encouraged as part of SuDS and in particular where land take impacts on the viability of providing sustainable drainage solutions.
2.20 The standards also promote the use of the Suds management train, or hierarchy, which should be followed when dealing with surface water. This means that sites should mitigate surface water in the following order:

- Source Control (i.e. within the development and where the water falls)
- Site Control (i.e. management within the boundary of the site)
- Regional Control (i.e. solutions that serve more than one development)

c. Strategic Policy

Pre Submission West Northamptonshire Joint Core Strategy (WNJCS), (February 2011)

2.21 There are a number of water bodies in West Northamptonshire, which create flood risk areas. The Joint Core Strategy policy ensures that New Development is directed to areas and the lowest areas of flood risk where possible to do so. Policy BN7 sets out the requirements for development and the exception test for West Northamptonshire. The policy also incorporates the methods to manage surface water, including the separation of surface water from foul and combined and the protection of watercourses to maintain or improve water quality standards. This policy is being updated through a ‘Focused Change’ to reflect the update in legislation and recent evidence, such as the updated Phase II Water Cycle Strategy. The focus change to the West Northamptonshire Joint Core Strategy will, when adopted, assist in ensuring that development sites within the CAAP are sustainable and help to contribute to minimising flood risk from all sources across Northampton. The current policy within the CAAP is still in conformity with this strategic policy.

The West Northamptonshire Infrastructure Delivery Plan (WNIDP)

2.22 The Infrastructure Delivery Plan (IDP) for West Northamptonshire has been developed with stakeholders to: ‘Assess the quality and capacity of transport, water, energy, telecommunications, utilities, health and social care, waste and flood defence infrastructure and its ability to meet forecast demands’ (PPS 12 Paragraph 31)

2.23 The West Northamptonshire IDP identifies a number of measures related to resolving flood and water management constraints to enable development. The IPP for West Northamptonshire is in draft form with ongoing consultation taking place between the Local Authorities of Northampton, Daventry, South Northamptonshire and Northamptonshire County Council and delivery agencies and service providers. It is a living document and will continue to be so through the LDF process. It is intended to form the basis of a Community Infrastructure Levy (CIL) for West Northamptonshire, which may include measures to mitigate flood risk through fluvial or surface water sources. The IDP will complement, and sit alongside the Northamptonshire Local Flood Risk Management Strategy and associated investment plan, which will include schemes required to enable future growth to be taken forward.

Northampton Surface Water Management Plan (NSWMP) 2011

2.24 NBC is a key partner in the preparation by the County Council of the Northampton Surface Water Management Plan (SWMP) with Anglian Water and the Environment Agency.

2.25 Objectives of the Plan include:
To create understanding of flood risk in Northampton by using modelling techniques
Establish areas at risk of flooding and to what level
Develop an action plan to reduce surface water flood risk in Northampton

2.26 Stakeholder/public engagement on the plan process was carried out over the months of October to December 2011. The anticipated completion date for this piece of work is May/June 2012.


2.27 This policy will contribute towards the following priorities and outcomes:

- Priority 7: Promoting health and well being – improved public health

3. KEY EVIDENCE BASE AND POLICY FORMULATION

3.1 The following technical evidence bases have been used to inform and justify the policy. Explanatory notes relating to each evidence base are provided.

Pre Submission West Northamptonshire Joint Core Strategy (WNJCS), February 2011

3.2 In addition to providing the overarching policy context for the Northampton Central Area Action Plan, the Pre-Submission Joint Core strategy highlights the known capacity issues with regard to existing infrastructure and flood risk for Northampton. It recognises the important role that a waterside renaissance will play for the town and is supportive of utilising the river as an asset. The Pre-submission document contains specific policies with regard to flood risk and water management. The current policy reflected strongly the requirements of PPS 25 and includes the requirements for the Sequential and Exception test (these are within the subsequent NPPF which replaced PPS25). Furthermore, the document through the sustainability policy looks at some of the softer measures, such as Code for Sustainable Homes, and recognises the cumulative benefit of these smaller measures in managing flooding and improving water quality across Northampton.

The West Northamptonshire Infrastructure Delivery Plan (WNIDP)

3.3 The focus for the development of part of the evidence base is the West Northamptonshire Infrastructure Delivery Plan (WNIDP). The IDP identifies a number of measures related to flood and water management, which were identified as essential to effective delivery of growth in the town and central area.

3.4 The IDP identifies 2 key primary infrastructure projects related to water infrastructure. The need for these key projects results from the conclusions of the studies referred to in this paper. These, with other components of provision, will ensure the delivery of development in the Central Area by 2026. Further details, including the indicative costs, funding source and who is responsible for provision is set out in the IDP.
<table>
<thead>
<tr>
<th>Project</th>
<th>Reason for requirement</th>
<th>Indicative phasing</th>
<th>Responsible Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improvements to the Waste Water Network - Northampton Town Centre</td>
<td>To provide capacity to the main sewer allowing for increases in waste water flows</td>
<td>Scale and type of solution to be informed by Northampton Central Area Drainage Assessment (2012)</td>
<td>AW</td>
</tr>
<tr>
<td>Waste Water Treatment Works - Great Billing, Northampton</td>
<td>Increased capacity required for development in Northampton beyond 2015</td>
<td>Works to commence in 2015 and complete by mid 2016</td>
<td>AW</td>
</tr>
</tbody>
</table>

**West Northamptonshire Strategic Flood Risk Assessment Level 1 Report – Feb 2009 Scott Wilson**

3.5 The Environment Agency has been closely involved in the preparation of the Strategic Flood Risk Assessment (SFRA) and they have stated that it meets the requirements that were set out in PPS25. This report collates information on flood risk and enables sequential testing to be carried out on development sites in the Central Area.

**Northampton Borough Council: Strategic Flood Risk Assessment Level 2 Report – Feb 2010 Scott Wilson**

3.6 Part of the evidence base for the core strategy, which establishes the soundness and deliverability of the strategy, is the Northampton Level 2 Strategic Flood Risk Assessment (SFRA). This was completed in 2010 (Scott Wilson for West Northamptonshire Joint Planning Unit). The Environment Agency confirmed that the document met the requirements that were set out in PPS 25, for use to inform planning work. The Environment Agency stressed that the report should be regarded as a living document subject to being updated in the light of changed information/circumstances.

3.7 Following the completion of the sequential tests, any sites that cannot be located within a low flood risk area (i.e. Flood Zone 1) should be examined in a Level 2 assessment. This provides the context for exception testing that will need to be applied to development sites that are located in identified areas of flood risk.

3.8 The assessment undertook breach modelling testing, that is it sought to identify the risk to areas behind flood defences. A number of breach locations have been modelled. Since this time the EA has modelled additional breach points for the entire stretch of the Nene through Northampton. The degree of possible inundation varies based on depth and speed of flow and a number of solutions are proposed e.g. setting development back from watercourses/mixed use development – locating less vulnerable uses in flood risk areas. Guidance is given on design of development sites both to reduce flood risk and to anticipate flood event emergency planning.

3.9 The Level 2 SFRA is aimed at reducing uncertainty by specific assessments of development sites and their proposed land use - that cannot be located in Flood Zone 1.
Sequential Testing (West Northamptonshire Joint Planning Unit)

3.10 A sequential risk-based approach is used to determine the suitability of land for development in Flood Risk areas in accordance with PPS25 (this requirement is taken forward in the NPPF). Using the information within the Level 2 SFRA, it is possible to identify the areas at highest risk of flooding, both from fluvial sources and surface water.

3.11 The sequential testing approach identified a number of sites within the Central Area that are at risk of flooding, either from fluvial sources or surface water. Within the Central Area, in order to meet the regeneration aspirations, it may not be possible to direct all development away from the river valley. A number of key regeneration sites are located along the waterside. In terms of developing the strategy, effort has been made to ensure that more vulnerable uses, such as housing, have been directed to areas at least risk.

3.12 The Avon/Nunn Mills site does not meet this requirement and was put forward for exception testing.

Exception Testing (West Northamptonshire Joint Planning Unit)

3.13 Some development will only be appropriate if it passes the Exception Test, whilst other development will always be inappropriate to certain flood zones. The aim of planning policy is to ensure development within flood risk areas is exceptional and that any development and its occupants will be safe throughout its life, taking into account climate change. The Exception Test provides a method of managing flood risk while still allowing necessary development to occur. Where possible it aims to reduce overall flood risk on and off site. All three elements of the Test must be passed for development to be permitted and failure of the Exception Test is sufficient reason for refusal of planning permission.

3.14 Due to the nature and regeneration opportunities presented by the Avon Nunn Mills development, it is considered that it meets the requirements of the exception test; this includes the provision of ‘wider sustainability benefits’, development of previously developed Brownfield land and resilience/resistance measures.

West Northamptonshire Water Cycle Strategy Phase 1 – May 2009
Halcrow

3.15 The Water Cycle Strategy (WCS) has been developed under the direction of a stakeholder steering group including Daventry District Council, South Northamptonshire Council, Northampton Borough Council, Anglian Water Services Limited (AWS), the Environment Agency (EA) and West Northamptonshire Development Corporation (WNDC, who commissioned the study).
3.16 It has assessed the potential impacts and constraints associated with the proposed major development areas including sites in the Central Area with regard to the key topics of:

- Flood risk;
- Water resources and supply
- Foul Sewerage
- Waste water treatment
- Water quality and water-related ecology.

3.17 This WCS also provides guidance on the role of the water cycle infrastructure in achieving sustainable development. It identifies actions and responsibilities to help move forward, as well as addressing potential barriers to achieving this vision.

**Flood Risk Management**

3.18 Northampton is the largest urban area in the study area, and as such is the focus of the majority of the development. As there are two major branches of the River Nene, the Kislingbury Arm and the Brampton Arm, flowing through Northampton Central area, and results in a large proportion of the town adjacent to the watercourses lies within Flood Zones 2 and 3.

3.19 Past flood events have not been confined to storm water: Anglian Water has advised that the DG5 Register (flooding of foul sewers due to lack of capacity as reported to OFWAT) lists a number of properties that have suffered foul water flooding within Northampton; Northamptonshire County Council holds this information.

**Foul Drainage, Sewage Treatment and Water Quality**

3.20 Northampton wastewater is treated at Great Billing WwTW, located 6km east of the town centre, on the north bank of the River Nene. The sewerage network transfers to the WwTW via two 1500mm diameter sewers from the town centre; this includes all wastewater discharged from the Central Area.

3.21 Based on flow consent headroom, Great Billing WwTW currently has little or no capacity for accommodating new connections. Anglian Water (AWS) is currently negotiating a revised flow consent. Based on growth data, the treatment process can cope with flows until about 2016. Between 2016 and 2026 additional capacity will have to be added to cope with the increased flow rates. Additional treatment capacity is likely to be provided (expected to be required post 2015). This will have implications for the regeneration and redevelopment of the Central Area, through intensification of existing uses.

**Water Resource and Supply**

3.22 The study area is supplied by the AWS’ Ruthamford Water Resource Zone. There is capacity in this Water Resource Zone in West Northamptonshire that will be able to meet the planned growth in the study area.

3.23 It is recommended that, due to the specific pressures faced, the region should adopt a number of water management measures, for example:
• All new buildings, including flats, must be metered;
• Whenever possible developments should consider the benefits of rainwater harvesting and water recycling in new developments
• Use of low water use landscaping and gardens.

3.24 All these measures adopted need be applied to new development in the central area, as appropriate, to encourage the more efficient use of resources and avoid the need for connection to the existing network.

**West Northamptonshire Water Cycle Strategy Phase 2 –September 2011**

**Halcrow**

3.25 The Level 2 study looked in particular at the Sustainable Extensions to support the Joint Core Strategy. The report highlights existing infrastructure deficits and issues, such as the difficulties that Northampton will have in meeting ‘good ecological status’.

3.26 With regard to the supply of water, the study emphasises the requirement for water neutrality, this means that for every new development, total water use across the wider area after the development must be equal or less than total water use across the wider area before development. This presents particular challenges for the re-development and intensification of uses within the Central Area. In order to meet water neutrality, it is important that existing development is also encouraged to use water more efficiently.

3.27 The Phase II Water Cycle Strategy undertook a wastewater network analysis to understand the capacity within the existing wastewater network for:

• Committed development;
• The immediate wastewater network infrastructure solutions;
• The capacity within the existing network and options for strategic infrastructure.

3.28 This analysis identified that Northampton has a number of ‘combined sewer overflows’, which act as relief to prevent foul sewage flooding property during extreme rainfall. The majority of the central area drains into the Bedford Road combined sewer, and further work was recommended to identify ways in which capacity for foul water could be accommodated to meet the wider development needs of Northampton.

**Northampton Central Area Drainage Assessment May 2012 (Halcrow)**

3.29 The Borough Council, working with The Environment Agency and Anglian Water, commissioned Halcrow to undertake a Drainage Assessment specifically for the Central Area. The Drainage Assessment seeks to identify the volume of attenuation required should surface water be removed from the combined (and foul) sewer system to provide additional capacity. It also suggests possible appropriate mitigation measures for sites within the CAAP area.

3.30 In Northampton, there is particular concern with respect to waste water capacity; this relates to the findings of the Level 2 Water Cycle Strategy with regard to the existing infrastructure and the ability of the Bedford Road network to carry additional capacity. This is because of additional development both within the Central Area and via the Sustainable Extensions proposed within the Joint Core Strategy; this could potentially inhibit development unless alternative solutions are identified.
3.31 The study has indicated that it is possible to accommodate development proposed within the CAAP without making the existing surface water flooding situation worse, and, for some locations enabling betterment. The study has identified, in accordance with Anglian Water policy, that there is potential for separating surface and foul drainage as part of the redevelopment of the Central Area thus creating additional capacity and encouraging a more sustainable drainage solution.

3.32 Notwithstanding space requirements, infiltration SUDs and design interventions such as rain gardens may be incorporated into developments. The study provides an indication of the amount of surface water that will need to be retained from various scenarios. A further piece of work has been commissioned to give a greater level of detail of the design of strategic storage solutions that can be delivered, particularly in areas of significant change.

4. PUBLIC CONSULTATION

4.1 The Council embarked on a series of public consultation exercises, which relate to the milestones of the plan preparation process. Each stage of the consultation process provided an opportunity to engage with consultees, both in terms of the plan itself and to assist in policy formulation. The process is outlined in the Consultation Report. Below are the key outcomes from the various stages of the consultation process leading up to Submission, which have been used to progress, shape and formulate policies.

a. Issues and Options (September – November 2007)

4.2 Feedback from the Issues and Options consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Design principles and sites specific policy needs address flood risk and drainage issues.</td>
<td>• Flood risk / drainage and the introduction of Sustainable Drainage requirements have been taken into account in formulating Policy 5.</td>
</tr>
<tr>
<td>• Sustainable features such as Sustainable Drainage Systems (SUDS) should be promoted in the plan</td>
<td></td>
</tr>
</tbody>
</table>

b. Emerging Strategy Consultation (August - September 2009)

4.3 Feedback from the Emerging Strategy consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>The CAAP should demonstrate further consideration of flood risk in the context of climate change and how the River Nene corridor could be optimised through basing the plan on a robust evidence base and a positive</td>
<td>The Level 1 and 2 SFRA have been completed and inform designation of development sites and Policy 5.</td>
</tr>
<tr>
<td><strong>Strategy</strong></td>
<td><strong>C. Pre-submission Consultation (November 2010)</strong></td>
</tr>
<tr>
<td>--------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Recommend the inclusion of key messages in the Vision Statement to highlight the CAAP’s commitment to mitigating against climate change. The vision could also include reference to reducing or adapting for flood risk in relation to climate change.</td>
<td><strong>Summary</strong> The Water Cycle Strategy Phase 1 and the Strategic Flood Risk Assessment for West Northamptonshire have identified concerns about water infrastructure capacity and surface water management. The evidence base needs to be progressed to ensure that there will be adequate infrastructure to enable development and to demonstrate that flood risk will not be increased. Solutions must be identified together with mechanisms for their delivery. Concerns about water pollution prevention and planning to respond to climate change also need to be addressed in further studies. <strong>Policy Response</strong> The Water Cycle Strategy Phase 2, Infrastructure Delivery Plan and the Central Area Drainage Assessment are now complete and identify constraints and infrastructure needs. Mechanisms to secure infrastructure will be identified in the SPDs on Developer Contributions for both Northampton and West Northamptonshire. In accordance with PPS 25, Sequential Testing and Exception Tests have been detailed in the CAAP Evidence Base, as appended in this technical paper.</td>
</tr>
<tr>
<td>Strategic Objective SO8 addresses sustainability and a framework for action on climate change. In addition the WNJCS provides further detail on flooding and climate change measures.</td>
<td><strong>Summary</strong> Sequential and Exception Testing with transparent reasoned justifications is required to designate Sequential and Exception Testing with transparent reasoned justifications is required to designate</td>
</tr>
<tr>
<td>development sites. The evidence base needs to demonstrate that the necessary infrastructure can be delivered to enable proposed development, without risk to flood prevention and water infrastructure capacity. Although the Floods and Water Management Act 2010 places surface water responsibilities on the County Council, there is a need for Northampton Borough Council to engage in strong collaborative planning with the Environment Agency and other stakeholders to resolve constraints in detail.</td>
<td>the subsequent NPPF) is adequate for development sites, as appended to this paper. The development sites referenced in Policy 5 are considered appropriate for development, however, this needs to be qualified as site specific Flood Risk Assessments (FRAs) will be required at planning stage to demonstrate that the proposed development will be safe.</td>
</tr>
<tr>
<td>New infrastructure / treatment is required to serve proposed growth at a number of the sites designated for development through the sites specific policy.</td>
<td>The Council are fully engaged with stakeholders for both the Central Area Drainage Plan and the County Council’s Northampton Surface Water Management Plan.</td>
</tr>
<tr>
<td>Strategic Objective 8 could benefit from specific reference to flood risk and waste management as this is such as important consideration.</td>
<td>Noted, but for the sake of brevity in the objective it is considered that the reference to developing in a sustainable manner is sufficient to address a wide range of issues such as flood risk and waste management.</td>
</tr>
<tr>
<td>The Green Infrastructure section should have clearer links to flood risk management, the contribution to the heat island effect and carbon sinks. It should also note that the Green Infrastructure can also contribute to improved water quality.</td>
<td>It is considered that there is sufficient inter-reference between the Green Infrastructure section and Flood Risk and Water Management section to highlight their interdependence and potential dual role.</td>
</tr>
<tr>
<td>The final sentence of 4.4.5 should include the risk of sewer flooding i.e. the current infrastructure deficit if not addressed could result in potential backing up of the sewerage system, increased pollution of watercourses and general sewer flooding.</td>
<td>It is considered that it is implicit that the backing up of the sewerage system will bring associated issues, for the sake of brevity it is considered not necessary to list these.</td>
</tr>
<tr>
<td>Section 4.4.6 bullet point 3 could be improved.</td>
<td>Bullet point 3 - permeable paving is...</td>
</tr>
</tbody>
</table>
include reference to permeable paving.

regarded as a Sustainable drainage solution, for the sake of brevity it is considered not necessary to list all potential solutions under this category.

5. **SUSTAINABILITY APPRAISAL**

5.1 In appraising Policy 5, the Sustainability Appraisal Report (October 2010) concluded that it had no significant negative impacts. It concluded that the policy would have a significant positive impact on biodiversity. Significant positive impacts were also identified in relation to energy and climatic issues. Minor positive impacts were identified in relation to landscape/townscape, biodiversity, material assets and water.

5.2 The report recommended the following mitigation measure be in place:

- Ensure proposals for new development and infrastructure adhere to the results of the Northampton Central Area Drainage Strategy. This requirement should be built into Policy 5.

5.3 Although Policy 5 does not refer specifically to the Central Area Drainage Study, it is an implicit and detailed part of the evidence base for the Policy and adherence to the recommendations will follow from the Policy guidance.

6. **DELIVERY FRAMEWORK**

a. **Delivery Mechanisms**

6.1 The policy will be delivered through a range of measures:

6.2 The West Northamptonshire Joint Core Strategy, which will be at Pre-Submission stage in January 2011, sets out strategic policy on development not increasing the risk of flooding; this builds on PPS25 (consistent with the subsequent NPPF) and will apply to all sites within the Central Area. No specific circumstances within the Central Area justify an additional policy within the Central Area Action Plan. However, major development site policies, for those sites subject to exception testing, contain reference to the need to address the risk of flooding.

6.3 These exception test sites are the key sites for consideration of the balance and nature of development reflecting:

- a) The need to regenerate underused and unsightly areas of the town centre
- b) The need for these sites to yield employment, housing etc outputs within the overall Action Plan and
- c) The essential consideration and minimisation of flooding and drainage impact.

6.4 It has been stressed that there are deficiencies in existing infrastructure to deal with surface water run-off and sewage that will cause problems if not addressed. Most of the Central Area has combined sewers, which in heavy periods of rainfall can overflow into the river. This has an impact on water quality. The current infrastructure deficit if not
addressed, with the development proposed could result in potential backing up of the sewerage system and increased pollution of watercourses.

6.5 The need for new drainage infrastructure has been identified in the Northampton Central Area Drainage Assessment, with more detailed strategic / site specific solutions identified in a Phase 2 study that has been commissioned in May 2012. This is likely to particularly concentrate on the increased separation of foul and surface water. Such infrastructure also forms a key delivery element in the Infrastructure Delivery Plan, which will form part of the West Northamptonshire Joint Core Strategy, at Pre-Submission stage in January 2011.

6.6 The delivery of the key element of the Policy that development will not increase the flow of surface water or foul sewage to the combined sewer network will be developed in the design and master-planning of proposals by incorporating a number of solutions:

- Reducing demand for water from new premises through water efficiency measures
- Including low flow appliances over and above current building regulations
- The use of grey water recycling
- Reducing run-off by means of green roofs and sustainable drainage systems by on and off site
- The separation of the combined sewers into foul and surface water.

6.7 These solutions also need to maximise the opportunity to increase biodiversity and the greening of neglected waterside areas.

b. Policy Delivery

6.8 Policy 5 reflects the outcome of guidance in the Water Cycle Strategy and delivery will be further detailed by the outcome of the Central Area Drainage Strategy Parts 1 and 2. Policies in both the West Northamptonshire Joint Core Strategy and the CAAP will be used to carry forward the assessment findings.

6.9 The redevelopment of the Central Area provides the opportunity to separate surface water from the foul system, to provide a more sustainable drainage system and to provide capacity within the foul system. The assessment of development proposals needs to promote this approach, ensure that this happens, and ensure that development does not occur until capacity has been created.

6.10 For brownfield development sites, where a proposal in the Central Area has an existing connection to public sewers, the proposal should as a minimum integrate source control measures, such as green roofs or permeable paving, to reduce the total impermeable runoff area connected to the surface water or combined drainage system from the existing situation.

6.11 For redevelopment sites, there should be no proposed increase in the rate or volume of discharge of foul sewage to the foul or combined sewer compared to the previous land use. Demand management measures can be used in both household and commercial projects to control the rate and volume of discharge.
6.12 As part of any Sustainable Drainage System (SuDS) design opportunities should be taken to make space for water and open up culverted watercourses on site if appropriate.

7. CONCLUSIONS

7.1 Following the significant flooding to Northampton town centre during Easter 1998, improvements have been made to the defences along the River Nene. In order to secure the level of protection afforded by the new defences it was agreed that the standards set for new development should also be improved, beyond that required in nationally applicable standards. All new development in the Upper Nene catchment must now be designed for a flood with a 0.5% probability (1 in 200 chance) occurring in any year, including an appropriate allowance for climate change. This includes design of mitigation for main river flooding and any surface water attenuation. This applies across the whole of the Upper Nene catchment including all branches and arms of the Nene, upstream of Billing Aquadrome, and all tributaries such as Wootton Brook, Dallington Brook and Bugbrooke Brook. This is supported by the ‘Strategic Review of development and flood risk, Nene catchment Northampton and upstream’ and reinforced more recently in the Level 1 West Northamptonshire Strategic Flood Risk Assessment (February 2009).

7.2 However, one of the greatest risks faced in the Central Area is that from foul and surface water flooding. The Northampton Drainage Plan will assist in determining the site-specific solutions required and a way forward for managing surface water in a sustainable way. In addition to minimising the risk of flooding, managing surface water will also provide wider benefits with regard to increasing the sewer capacity within the Central Area to accommodate the new development planned.

7.3 Since developing the policy for the CAAP, there have been a number of significant policy and legislative changes. It is hoped that, in partnership with the Lead Local Flood Authority, the Environment Agency and, where appropriate Anglian Water, that additional guidance can be developed to assist with the design and technical requirements for the management of water within the area, utilising the broad framework policy set out within the CAAP.
1. INTRODUCTION

a. Context

1.1 Northampton is well connected; nationally to London and Birmingham, regionally and sub-regionally to surrounding towns such as Milton Keynes and Bedford. Northampton’s Central Area provides the ‘hub’ for many of the journeys made by public transport within Northampton: key nodes are the existing Greyfriars bus station and the railway station. Some longer distance movements are also (for example north-south to Market Harborough) routed via the town centre.

1.2 The town centre is perceived as heavily congested and dominated by vehicles. Much of this perception is fuelled by past engineering solutions which have sought to segregate pedestrians and vehicles leading to roads and crossings that are difficult to negotiate as a pedestrian or cyclist. Moreover, due to the wider road network of Northampton, the Central area Acts as a major interchange point for cross town journeys. Despite the perception of heavy congestion, transport modelling carried out for the Central Area Action Plan evidence base and the Joint Core Strategy demonstrates that congestion is of similar levels found in comparator town centres across the country. There are however ‘hot spots’ of congestion, most notably around the inner ring-road. Although Northampton does not suffer from acute congestion at present, traffic levels are expected to rise. Even with changes to the highway network and other interventions such as improved public transport, congestion is likely to become progressively worse.

1.3 This paper deals with the formulation of policies 6, 8, 9 and 10. These are part of a transport strategy that meets the development and regeneration aspirations set out within the CAAP. It also seeks to ensure that the transport elements of Northampton’s Central Area contribute to the economic, social and environmental needs of the town. This paper, where relevant, refers to more specific schemes, such as the Bus Interchange (Policy 7) and Castle Station (Policy 19). These in themselves are major development sites and as such the evidence for their policy formulation is dealt with in separate Technical Papers.

b. Transport Policy Aims

1.4 There are a number of key issues associated with transport and movement within the central area.
**Movement hierarchy**

1.5 One of the greatest issues for Northampton’s Central Area is how to balance the operational nature of the inner-ring road with design aspirations to allow a greater freedom of movement for pedestrian and cyclists. The ‘barrier’ created by the road is particularly acute around Victoria Promenade, Horsemarket and the Mounts. It creates issues of movement for pedestrians and cyclists between the town centre and the Waterside; the community of Spring Boroughs and the railway station; and the residential areas to the North of the Central Area respectively. However, even within the central core where movement is arguably easier, there are still issues with signage, legibility and the hierarchy of streets.

1.6 The Inner-Ring Road has, in the past, been heavily engineered and each part highlighted has specific issues. For example, at Horsemarket the road is between 4 and 6 lanes wide, with a series of subways and more recent at-grade crossings; it gives overwhelming priority to traffic movement. The Southern area of the ring road (Victoria Promenade) has a number of traffic gyratory systems (for example the Plough Junction) and major roundabouts, which reflect the route’s strategic importance for movement within the town and car priority. There are relatively few crossing points, which restricts access to the Waterside. It is recognised that removing traffic completely from these routes is not a feasible option; however, solutions that could improve the legibility and safety for pedestrians and create a more shared environment, whilst not significantly affecting traffic flow levels could be implemented.

1.7 The strategic traffic modelling carried out to support the Pre-Submission Joint Core Strategy has demonstrated that there is potential relief from some through town centre movements should a North-West bypass be constructed. However, there will remain significant amounts of traffic on the routes around the Central Area. A policy approach, to assist in the re-designing and re-prioritising of movement more fitting for a well-designed centre is required. This will also need to recognise the technical challenges of ensuring that access to the areas is not compromised.

**Parking**

1.8 Parking is perceived to be a major issue for Northampton’s town centre. Too much parking at low cost increases congestion and compromises the aspiration to achieve modal shift to more sustainable modes, as set out in both the Regional Plan and the Pre-Submission Joint Core Strategy. On the other hand not enough parking or parking which is too expensive will hinder early regeneration attempts and may deter potential investors in the retail and office market.

1.9 Various parking studies have been undertaken to support the Central Area Action Plan. All studies have highlighted the poor perception of the parking offer within Northampton despite its relatively plentiful and reasonable cost in comparison to other towns. However, it is noted that signage, location and advertising of the existing offer is generally poor. The ambition set out in CAAP is to re-develop the Grosvenor Centre together with a commitment to deliver more employment opportunities within the Central Area. Against this background it is vital that the policy approach creates the correct balance and allows for effective management of the parking stock to ensure the most efficient use of land.
2. POLICY CONTEXT

National planning policy

2.1 The NPPF views transport policies as vital in facilitating development as well as contributing to sustainability and health. The policy direction retains the commitment to reducing the need to travel but acknowledges that the transport system requires a balance to allow a wider choice as to the mode.

2.2 The policy states that, where practical, solutions should support reductions in greenhouse gas emissions and reduce congestion. To this end, paragraph 34 identifies that development should be located in areas that facilitate the use of sustainable transport modes and where the need to travel can be minimised. Subsequently it also sets out the approach to parking provision, parking charges and enforcement. Local Parking Standards should take account of the accessibility, type, mix and use of development; the availability of and opportunities for public transport; car ownership levels and the need to reduce the use of high emission vehicles. The quality of parking in town centres must be improved, charges must not undermine the vitality and enforcement needs to be proportional.

Regional Planning Policy

2.3 The East Midlands Regional Plan contains both the Spatial Strategy, relevant to housing, and the Regional Transport Plan. The Section of the plan that focused on transport contained the broad strategy, focusing on the need to reduce the need to travel, in addition to setting maximum parking standards for town centres.

Strategic Policy

2.4 The WNJCS Pre Submission document (February 2011), contains a number of policies that are relevant to setting the context for the Central Area Action Plan’s approach to transport. This includes: Policy C1: Changing Behaviour and Achieving Modal Shift; C2 New Developments; C4: Connecting Urban Areas; C5: Enhancing Local and Neighbourhood Connections; N1: The Regeneration of Northampton; N12: Northampton’s Transport Network Improvements.

2.5 In summary, these policies set out the need to improve access to, promote the use of and make provision for walking, cycling and public transport networks and facilities. They set out the need to ensure walking, cycling and public transport networks connect with key facilities and services and link to key transport interchanges.

Northamptonshire Local Transport Plan (2012)

2.6 The 2012 Northamptonshire Transport Plan has been informed by a comprehensive review of existing transport policies and includes a table of priority schemes for delivery. It is a strategic transport policy document that will rely on a number of subsequently produced ‘daughter’ theme based documents that will provide more detail. In relation to Northampton, it sets out the principles to underpin a Transport Strategy for Northampton. (as yet not published)
Connecting Northamptonshire (NCC 2011)

2.7 The Northamptonshire Arc “Connecting Northamptonshire” (October 2011) is a County Council document that covers the whole of the area. It is principally concerned with economic growth and prosperity and views the transportation network as an essential means to achieving the vision. With regard to Northampton Town Centre, the document specifies that there should be improvements to the network to enable all town centre developments and improved connectivity to the railway station, development and the implementation of new car parking and bus strategies. The document makes specific reference to the St John’s area, the Marina, the Grosvenor Centre and the bus station.

2.8 In addition, the document also specifies improvements to the connectivity between the Town Centre and Brackmills with potential to use the old railway line option.

c. Local Policy

Northampton Corporate Plan (2012 – 2015)

2.9 The policies will contribute towards the following Priorities and outcomes:

- Priority 1: Northampton on track – delivery with partners of major town centre regeneration projects such as the redevelopment of Grosvenor Greyfriars, a new bus interchange……
- Priority 3: Celebrating our heritage and culture – increased tourism
- Priority 7: Promoting health and well being – improved public health

2.10 In conclusion, working effectively with communities, partners and stakeholders to deliver plan for and deliver a better Inner Ring Road and a pedestrian and cycling network that can improve access into, around and beyond the Central Area and through the provision of better public transport facilities the CAAP policies will support the delivery of the Corporate Plan priorities to create a sustainable and green town where people feel safe and ensure the development of a vibrant town centre is supported so local communities, and visitors view Northampton’s Central Area as a great place to live, visit and work.

Sustainable Community Strategy for Northampton (Northampton Local Strategic Partnership 2008 – 2011)

2.11 The Community Strategy outlines the Local Strategic Partnership vision for Northampton up to 2031. The vision states that Northampton will build upon its historic market town roots to become a 21st century market city with diverse multi-cultural communities giving leadership to Northamptonshire as part of its principal urban area. The Strategy contains a number of aims that are relevant to setting the context for the Central Area Action Plan’s approach to transport. This includes the provision of social, physical and green infrastructure; improving the quality of life in urban areas; making places safe, attractive and clean; improving health and lifestyle; designing health into growth and regeneration and the promotion of sustainable transport.

2.17 In summary, these policies set out the need to improve access to, promote the use of and make provision for walking, cycling and public transport networks and facilities. By doing this people will be encouraged to walk and cycle more which is better for their health.

Northampton Central Area Action Plan Submission Version May 2012
3. **EVIDENCE BASE**

3.1 The evidence base for the Central Area Action Plan has been developed through a combination of technical transport modelling and design. In addition there has been urban design and movement studies that look at the impact that different transport interventions will have on the overall legibility and design of the Central Area, taking into account the broad regeneration aspirations of the Central Area Action Plan.

**Northampton Town Centre VISSIM Model Report (MGWSP 2011)**

3.2 The VISSIM model has been developed for the Central Area. The VISSSIM model can be used to highlight existing and future town centre traffic trends. The model has a 2009 base year and future can be built using TEMPRO growth rates.

3.3 The findings to date are that VISSIM provides a reasonable assessment of present day junction and network capacity and the use of TEMPRO growth rates provide an indication of what might happen on the network in the future. However, the results need to be interpreted with some caution as the model provides a ‘fixed-route’ scenario i.e. it does not ‘allow’ traffic to leave the ‘model’ boundaries, for example, onto side streets or to exit the Central Area on an alternative route.

**Modelling Assumptions for Central Area Action Plan (ARUP 2011)**

3.4 Northampton’s MULTI MODAL model has been used to understand the wider traffic implications of the CAAP proposals.

3.5 The findings illustrate that the development coming forward in Northampton will increase the number of vehicles on the local and strategic network and many of these journeys will have a destination point in the Central Area as a result of development.

**West Northamptonshire Joint Core Strategy - Modelling to support the Pre-Submission Core Strategy**

3.6 Although not developed specifically for the CAAP, a large volume of different scenarios have been tested to support the development assumptions within the Pre-Submission Joint Core Strategy. In addition to highway only assumptions, some model runs for the JCS used a method which ‘skimmed’ the matrices to reflect the situation should the modal shift targets set out in the Transport Strategy for Growth (see Local Transport Plan). The targets assumed were a 5% shift away from private car trips in existing development and 20% for all new development.

3.7 The modelling reported the volume over capacity of specific junctions under this scenario. This is useful as it highlights the areas that still require intervention even if all measures to ensure modal shift can be implemented. The junctions can then be individually assessed to identify suitable mitigation measures that meet the wider aims and aspirations for movement within the Central Area.

3.8 Junctions within the central area of Northampton that showed a significant delay (60 seconds plus) even with Modal Shift Assumptions were:

- Regent Square
- Billing Road/Cheyne Walk/ York Road
3.9 Further work is being undertaken to determine what solutions can be implemented to reduce delay at these junctions in order to support the CAAP and the Northampton Transportation Strategy.

Parking in Northampton Town Centre: Recommendations for the Creation of a Future Strategy (MGWSP 2011)

3.10 The Recommendations study provides a baseline assessment of the existing situation for car parking in Northampton. The focus is on the Central Area but findings are set in the context of the wider Northampton area. Results are based on typical parking acts for a weekday and a Saturday. To analyse parking trends and capacity issues the baseline assessment focuses on provision, location, usage and the existing tariff system. Modelling work provides an understanding on the impact of population growth, modal shift and changes to the charging regime. There is also an examination of consultation results reflecting the views of stakeholders and members of the public about parking in the Central Area.

3.11 Findings illustrate that currently the total supply of parking exceeds the total demand; modelling on growth and modal shift came to the same conclusion. Modelling to determine whether the supply of parking is aligned with the most significant inbound flows found that the south, central south-west and central east consistently exhibit capacity issues. Capacity pressures for the other areas shift spatially depending on the week-day and weekend functions of the town.

3.12 The consultation revealed that a majority of people want a reduction in the cost of parking, improved signage, improvements to the appearance of car parks and better information on parking provision. Support was indicated for the provision of Park and Ride facilities.

3.13 The study concluded by providing a Matrix of Interventions based principally on management measures to address the issues highlighted above. The Matrix has been used as a basis for the development of a Parking Strategy for Northampton.

Northampton Town Centre Parking Strategy: Existing Situation (MGWSP 2011)

3.14 The Existing Situations study focused on two specific areas (i) the collection and analysis of new data to determine an accurate arrival and departure profile and (ii) interviews with drivers to ascertain single or multiple occupancy per trip; town and place of trip origin; direction and route of travel; trip purpose and what motivates car park choice.

3.15 The arrival and departure profiling found that the majority of parking acts are for less than an hour. Interview results showed that most people are coming from the east along the A45 to go shopping. In excess of 77% made their car park choice based on ‘closest to destination’; drivers rarely use alternative provision on a regular basis. Lone travelling occurred mostly on a Tuesday, most Saturday trippers travel from within Northampton Borough itself.
Northampton Central Area Parking Strategy: (MGWSP 2012)

3.16 The Northampton Parking Strategy clarifies the way forward for parking in the central area of Northampton. The document has recommendation for the following areas:

- Parking Charges and Payment Methods
- Control and Enforcement
- Location of parking
- Signage
- On Street Parking Options
- The Future Situation

Parking Charges

Occupancy and duration of stay should be monitored regularly to enable an assessment of price sensitivity to understand whether further changes are required to encourage great use and better economic prosperity.

Control and Enforcement

Investigation of introduction of more Pay on Foot town centre car parks and where not deliverable the level of enforcement increased to ensure compliance with the existing parking restrictions.

Location of Car Parks Within The Town Centre

Investigations to provide additional car parking in the south eastern area of the town centre to address potential imbalance and reduce un-necessary traffic circulation.

Signage Strategy

Introduce a signage strategy to encourage vehicles to park in the car park closest to their town centre entry point and introduce pedestrian signage showing time to reach key town centre destinations.

Provision of Long/Short Stay Spaces:

Change the designation of the town centre parking spaces to better reflect long and short stay parking acts.

Distribution of Long/Short Stay Designations

Separate out long and short stay parking acts; long stary car parks out side the inner ring, short stay inside.

Future Car Park Capacity In The Town Centre

Investigation of Park and Ride being operational by 2021 on the key corridors deficient in parking spaces; catering for proposed levels of town centre development without restricting movements for those wanting to access the town centre.
Parking Supplementary Planning Guidance (NCC 2003)

3.17 The Parking Supplementary Planning Guidance was prepared by Northamptonshire County council in partnership with the District and Borough Councils in Northamptonshire. It provides a guide to parking provision standards considered appropriate for new development. As far as possible standards relate to the classification of land use specified in the Town and Country Planning (Use Classes) Order 1987 (as amended).

3.18 The guidance sets out the need for district / borough councils to identify town centre and edge of centre zones. The guidance goes on to establish that no further private, non-residential parking should be provided in town centre zones. Parking on edge of centre should be restricted to 50% of the standard.

Northampton Central Area Design, Development and Movement Framework (BDP 2006)

3.19 The objective of this document is to bring forward a Masterplan that will deliver a design, development and movement framework (DDMF) to help guide investment in the Central Area until 2021. It includes a townscape appraisal and includes a street hierarchy to form the basis of a design palette for the Central Area’s public realm. The Masterplan sets out key projects that present an opportunity for physical change to enhance the Central Area.

3.20 The proposed Transportation and Movement Strategy establishes a number of aims that support the basis of all the CAAP transport policies: remove pedestrian severance into and throughout the Central Area; improve public transport facilities, circulation; create an integrated public transport system and increase the efficiency of the highway network and parking operations.

3.21 The Inner Ring Road and Horsemarket are highlighted as main causes for severance. A more efficient, passenger focused bus station is advocated. The Strategy provides a focus on measures that would see improvements to the Inner Ring Road including better traffic signalling and junction improvements. The notion that drivers should be encouraged to park at point of entry as opposed to at their destination and the need for improved signage highlighted.

3.22 In conclusion the transport strategy contained within the DDMF is consistent with CAAP policy as it seeks to improve accessibility within the Central Area particularly for pedestrians, cyclists and public transport. However, it recognises the role of private vehicles and seeks to reduce journey time and congestion through improved network efficiency and changes to parking practises.

Public Realm Implementation Framework (BDP 2007)

3.23 The Public Realm Implementation Framework has used the street hierarchy established by the DDMF to create a palette of materials to guide the selection, installation and care of Northampton’s public realm. The aim is to adopt a consistent design methodology which embraces ‘sense of place’ and creates a walkable town that balances an approach to all modes of transport. It was produced to guide future Area Action Plans and Supplementary Planning Documents.
Character Assessment and Tall Buildings Strategy for Northampton’s Central Area (Space 2010)

3.24 This study acknowledges the importance of character and local distinctiveness of Northampton through analysis of the built environment and the designation of 10 character areas.

3.25 The Study is emphatic that the car should not dictate movement and highlights how the ring road is creating barriers to pedestrian movement in some areas. The use of better connectivity, improved legibility and a need to encourage more sustainable forms of transport are promoted to improve the urban realm. There is a call for coherent, legible and safe vehicular and pedestrian links over the disused railway line to ensure connectivity between the Avon / Nunn Mills and Ransome Road and the Central Area. The Assessment highlights the need to avoid subways. It advocates the creation of seamless ‘straight across’ layouts, wide clear crossings, shared space and boulevard settings as a way to allow people to go where they want to be and an innovative way of dealing with severance. In terms of parking, it seeks to discourage any further provision of large surface car parking.

Green Infrastructure Strategic Framework: Making the Connection (LDA Design Consulting LLP 2006)

3.26 Making the Connection presents a fully integrated GI Strategy for Northamptonshire founded on the Sub Regional and Local GI Corridors. Set within the Framework are two interdependent networks namely the Biodiversity and Sustainable Movement Networks. The Biodiversity Network is founded on the biodiversity resource for Northamptonshire and the Sustainable Movement Network is focused on people and place providing a framework of connectivity to a range of destinations across the county.

3.28 Whilst it is recognised that the routes of all three networks are indicative they are intended as a focal point for investment and strategic projects. These networks have been used to inform the development of the Pedestrian and Cycling Movement Framework; they support the safeguarding of the disused railway line and the principles will be used to inform the development of the Inner Ring Road SPD
Northampton Cycle Development Plan (MGWSP 2010)

3.29 The Cycling Development Plan for Northampton seeks to facilitate delivery of modal shift targets set out in the Transport Strategy for Growth (NCC 2007). Its principle objectives are to identify the missing links in the network; which should become short and medium term improvements; develop a prioritised delivery programme and provide a long term strategy for each town network.

3.30 The Plan summarises schemes programmed for delivery against cost estimates and potential funding sources. It prioritises these using a weighting system associated with accident data, the proximity of educational establishments and healthcare facilities and increasing accessibility to trip attractors.

3.31 Relative to the CAAP the priority routes include the north to south / east to west through the Town Centre, the Inner Ring Road, and Becketts Park. All these routes have been used in the development of and are reflected in the Pedestrian and Cycling Movement Framework. The disused railway line is also highlighted as a priority scheme which supports the policy direction to safeguard the line to provide for a continuous cycling / walking / public transport route between Brackmills and Castle Station.

4. PUBLIC CONSULTATION

a. Issues and Options (September – November 2007)

4.1 As outlined in the Consultation Report (August 2008) the preparation of the Central Area Action Plan involved a series of public consultation exercises, which have been used to progress, shape and formulate policies.

4.2 Feedback from the Issues and Options consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Comments</th>
<th>Planning Policy response</th>
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<tbody>
<tr>
<td>Perception of public transport is poor - there is a feeling of antisocial behaviour, poor information, it is inconvenient, dirty and there are route limitations.</td>
<td>The CAAP cannot control the service provided. However, the policy has developed to improve the waiting facilities, signage and to integrate better design within public transport interchanges to reduce perceived crime levels.</td>
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<tr>
<td>Respondents to the Issues and Options questionnaire felt strongly that a central point for busses was essential (either retaining or making new provision for a bus station). Improved networks to support a fast and reliable service was also felt to be essential.</td>
<td>Policy 7 deals specifically with ensuring the provision of a new bus facility and meets the requirements of the town now, and in the future. Although there is little that can be done to change the network completely the comments support the need to develop an inner-ring road SPD as part of policy 6. The SPD will go some way to ensuring the network will be managed more effectively and buses will be given priority where appropriate.</td>
</tr>
<tr>
<td>Suggestions for improving parking</td>
<td>The need to improve parking is</td>
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</table>
included better management, in addition to prioritising short-stay parking, reduced commuter parking and the introduction of park and ride.

reflected in policy 10, and was identified in various evidence base documents. These have significantly progressed and are informing a strategy for parking in Northampton that will balance the competing demands of encouraging people to make trips. The implementation of Park and Ride is being considered as part of the Northampton Transport Strategy, which will support the Joint Core Strategy as it has wider implications that just the Central Area Action Plan.

There were a number of suggestions to improve access and movement. Key areas included access to the River Nene and Becketts park. Some responses also felt that the speed limit should be lowered within the Central Core to 20mph to make the area feel safer.

The main access issues relate to the segregation created by the inner ring road. Pedestrian access and legibility are incorporated into policies 6 and 8 to provide a more holistic approach and to integrate the solutions into a design led approach. The CAAP cannot lower the speed limit, although design led approaches within the Public realm (design) and other areas of the CAAP may encourage this approach.

b. Emerging Strategy Consultation (August/September 2009)

i. Delivery Stakeholders

4.3 West Northamptonshire Development Corporation, The Highways Agency, English Heritage and Northamptonshire County Council made significant representations with regard to the transport strategy for Northampton Central Area. Their key comments included:

**WNDC:** highlighted the need for a robust transport strategy, incorporating relevant transport modelling, to identify how people would access the town. They also raised the requirement for additional evidence to support the use of the disused railway line (Northampton Castle Station to Brackmills). WNDC considered that it was important to confirm the location for future interchanges in addition to identifying and aligning the transport strategy to the relevant spending priorities of Northamptonshire County Council.

**Highways Agency:** as with WNDC, the Highways Agency felt that the plan required additional evidence to support the proposed approach to transport in light of proposed growth (both within the Central Area and as set out within the Joint Core Strategy). The proposals should also ensure the safeguarding of the strategic road network. The HA also highlighted concerns with regard to the lack of emphasis on prioritising sustainable access to the town centres, but did welcome the restriction of long-stay car parking spaces within the town centre.

**NCC:** In addition to comments made in relation to the continuity plans relating to a new bus interchange (see paper for Policy 7), the main comment related to the need to ensure
that the approach to the inner ring road is balanced against the need to provide effective road capacity

**English Heritage:** felt that there was a requirement for a detailed design exercise to establish how modern traffic requirements can be accommodated with the objective of establishing townscape coherence. They also felt that further investigation of the principles of shared space needed to be explored as a way of safely integrating traffic with pedestrians. English Heritage felt strongly that the option presented of public through Becketts Park would result in the loss of trees and a larger junction would adversely affect the setting of listed buildings and a conservation area.

ii. **Others**

4.4 In general, a number of respondents considered that the inner ring road was a barrier to movement to the residents of the town. There were clear references made into the requirement for further research and testing of options before final decisions being made. The options should also consider the role of the ring road in the wider context of the network.

4.5 In relation to the pedestrian environment, there were comments made in relation to safety and the impact that car users have on the overall environment of the Central Area. It was felt that the principles of Secured by Design should be incorporated into future movement networks. Some respondents highlighted the need to improve access to the river corridor.

4.6 Other issues related to transport included the need to manage cars and parking with a variety of different options: park and ride, travel plans and charges were all suggested. However, the vast majority of comments received in relation to transport were in relation to the facilities and location of a future bus interchange (see Policy 7).

c. **Pre-submission draft (November/December 2010)**

4.7 Feedback from the Pre Submission Consultation event can be summarised as follows:

**Policy 6: Inner Ring Road SPD**

4.8 The policy was generally supported, with the response from Northamptonshire police strongly supporting the removal of sub-ways that presently link Spring Boroughs with the Town Centre thus creating a safer walking environment.

4.9 In order to enhance the policy, suggestions were made so that the supporting figures gave clarity to bus priority, pedestrian crossings and new junctions. It was also felt a broader urban design initiative is required beyond landscaping and public realm requirements; this is covered within policy 1.

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<tr>
<th><strong>Summary of Representation</strong></th>
<th><strong>Policy Response</strong></th>
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<tbody>
<tr>
<td>Clarify policy by referring to the nature of change that is intended. Show some indication that priority will be afforded to buses where possible to cross the Inner</td>
<td>• Amend 5.1.2 adding a sentence: These junctions will positively accommodate the plan's aim to prioritise walking, cycling and public</td>
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Ring Road and access the new bus interchange. New junctions should be accommodated in a sustainable way and will include, where appropriate, measures to assist public transport, walking and cycling.

The document sets out a range of projects that will improve the environment appeal of central Northampton. The Transport section although brief does deliver a message of a walkable city. However, the Highway Authority feels that the plan is its present form is not sound owning to the lack of information on what, when and by whom schemes within the Area Action Plan will be delivered.

A broader urban design initiative is required in conjunction with Policy 6 that goes beyond landscaping and public realm improvements.

<table>
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<tr>
<th>Policy 8: Safeguarded Public Transport Route</th>
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<tbody>
<tr>
<td>4.10 The policy approach was generally supported. One respondent requested that the policy was deleted to ensure that the route was safeguarded for alternative rail routes. Other comments related to clarification that the reference to ‘public transport’ is clarified as bus transport, otherwise it is felt that there is a danger that the policy would prejudice the release of the route from heavy rail status, with implications for the viability of Avon/ Nunn Mills redevelopment sites.</td>
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<tbody>
<tr>
<td>Policy 8 should be deleted as the rail corridor needs to be safeguarded for future rail use.</td>
<td>The decommissioning of the line is an issue for Network Rail, until this is done, the line remains operational rail land and subject to all the statutory requirements associated with this, including its loss of all or parts for non-rail uses needing to be approved by the rail regulator. These provisions are most relevant to its availability for other none railway uses. Should the land be decommissioned, as is the Council's wish due to the extremely unlikely use in the future for freight or wider strategic connections such as linking Northampton to Bedford, the policy seeks to protect a corridor within it from potential severance for a viable public transport link / walking and</td>
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</table>
The safeguarding of this rail route between Brackmills and Castle Station for public transport, cycle and walking route is supported subject to clarification being provided on the public transport element. It is considered that this point is satisfactorily addressed in the policy justification, the Council is clear that it does not support the operational use of the line.

Policy 10: Pedestrian and Cycle Movement Framework

4.11 The policy was generally supported. There was some concern that the presentation of the maps showed segregated routes between pedestrian and cyclists, which may lead to people feeling unsafe. However, in general the policy was supported in principle with the recognition of the importance of creating a walkable Northampton commended.

4.12 Some concerns were raised with regard to how the Grosvenor Centre redevelopment would dictate the location of the routes; these are dealt with in respect of the site-specific paper.

Summary of Representation

| The Grosvenor Centre scheme may dictate the location of these routes and if their development is possible. A new paragraph should be inserted after Policy 9 stating that: The Pedestrian Movement Framework and Cycle Movement Framework are illustrative, provide a broad overview, the final details of the development in the Central Area, including proposed pedestrian routes will be brought forward through site specific applications. " | Given the uncertainties associated with the final format of the Grosvenor Centre it is recognised that any lines on maps that pass through the area can only at this stage be regarded as indicative. Nevertheless it is considered desirable to have an east-west pedestrian / cycle link if this can be achieved, although in areas of particularly high pedestrian movement it might not be possible to cycle at peak times of use.

It is not considered that additional words proposed by the objector are necessary. The development can deal with this issue during the run up to proposals being submitted. If it is considered that there are practical reasons why an east / west link cannot be delivered, then these will need to be set out by the applicant.

- The change in character of the Inner Ring Road should not adversely affect the development of the Grosvenor Centre. L&G need to be a key stakeholder in the development of an SPD.

- The need and desirability of removing some of the subways is supported in principle. However, removal may not be possible in all cases, should it be

- Legal and General will be consulted in the production of the SPD. Proposals for the Inner Ring road will have to be mindful of the access requirements of existing and proposed developments, together with wider across town traffic movements.

- Subways are considered to be an unnecessary and alien environment within a town centre where there should
necessary to retain them, they will be improved.

be a suitable environment created that allows safe pedestrian crossing of streets at grade level. The Council does not consider that these should be regarded as an acceptable solution to deal with pedestrian movement.

Maps appear to show segregated routes between pedestrians and cyclists. This is contrary to the Manual for Streets guidance and may increase for people a feeling of 'unsafe' while using them leading to a decline in overall usage.

There are a number of routes proposed that have been designated specifically for pedestrian or cyclists use in relation to location and suitability. In the main there has been an effort to combine pedestrian and cycle as per current guidance, no change.

Policy should reference the need for on-site changing facilities for staff in commercial developments.

Reference is made to the provision of new changing facilities in Appendix E.

**Policy 11: Parking**

4.13 The response to the policy on car parking was mixed. The representation made by the Hospital highlighted the different requirements of the site, compared to other town centre used.

4.14 It was considered that failure to provide private parking for offices, shoppers and visitors in the short-term (and specifically during the construction of the new Grosvenor Centre) would deter firms from the town centre and limit regeneration. One response felt that the approach was too risky and would be a barrier to developing property marketable to a high-end user. However, the longer term review of parking when there are alternative, in addition to park and ride and the introduction of business parking levies was broadly supported.

4.15 Some comments looked at the requirement to review management of parking, including the desire to incorporate “quality standards” into the policy.

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<tr>
<td>Short term additional short stay car parking will be required to serve the redeveloped Grosvenor Centre and make it viable. Policy 11 should be altered to state within the first bullet point: “Within the Town Centre Boundary, excluding the Grosvenor Centre Redevelopment, as defined on Figure 8.1 ‘Proposals Map’ no additional private car parking for non - residential development will be permitted.”</td>
<td>Amend paragraph 5.8.3 by adding an additional sentence after the first sentence to state: “For clarity’s sake, private business parking is considered to be parking that is not open to any member of the general public to use without paying a fee, the level of which has been agreed with the planning authority and / or highway authority.”</td>
</tr>
<tr>
<td>Payment on exit of car parks should be introduced.</td>
<td>Reference to the review of parking charges is contained in supporting text of Policy 10. Detailed management of parking standards / arrangements is beyond the remit of the CAAP.</td>
</tr>
<tr>
<td>Clarity is required regarding parking</td>
<td>It is currently the case that town centre</td>
</tr>
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management including prioritising the needs of short stay shoppers and visitors, and future provision and management of long stay parking.

<table>
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<tr>
<th>Management is aimed at reducing the opportunities for long stay commuter parking, both through time restrictions and pricing mechanisms, and encouraging short term stays for retailing / visits. A car parking strategy has been commissioned to address the provision of car parking in the centre, with short, medium and long term outputs. These details can be set out in associated documents to the LTP or Council car park management policies. The CAAP has provided a broad outline of intent with regards to parking requirements, and this is considered an appropriate level of detail for the document.</th>
</tr>
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<tbody>
<tr>
<td>Failure to provide private car parking will deter firms from locating in the town centre and limit regeneration. Free parking should be introduced for under utilised car parks.</td>
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<tr>
<td>Where the majority of office floorspace is being promoted in edge of centre sites car parking will be provided, although not necessarily the same amount that might be considered appropriate in an out of town location. The road infrastructure of the town, particularly in the town centre is such that the transportation solution for new development cannot be one of providing uncontrolled levels of car parking. The money is not available to increase road capacity to the extent that would be required, to overcome congestion that would occur and even if it were it would be likely to lead to the removal of significant historic parts of the town centre which people have indicated are important.</td>
</tr>
<tr>
<td>Failure to increase parking in conjunction with the amount of new employment, leisure and retail development proposed in the CAAP would be disastrous.</td>
</tr>
<tr>
<td>There is currently substantial over provision of public car parking in the central area, some of it has been identified as being in the wrong locations, so there might be better reprovision elsewhere in the Central Area. The CAAP does not necessarily not permit any additional car parking, but that in exceptional cases where it is proposed it must be justified and be subject to management agreements with the County Council, so that it does not undermine transportation policy.</td>
</tr>
<tr>
<td>The Movement &amp; Place Guide (December 2008) is the County Council adopted policy guidance for residential developments, therefore residential developments will need to be assessed against this and not the Parking Standards; this guidance therefore needs referencing in the supporting text or policy.</td>
</tr>
</tbody>
</table>
| • Amend paragraph 5.8.3 by adding an additional sentence after the first sentence to state: "For clarity’s sake, private business parking is considered to be parking that is not open to any member of the general public to use without paying a fee, the level of which has
<table>
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<tr>
<th>Disappointed that no reference is made to the quality of car parks within the area. There should be a desire to deliver safer parks through the Park Mark scheme</th>
<th>Amend appendix E to replace parking standards for residential development included in The Movement and Place Guide (Dec 2008).</th>
</tr>
</thead>
<tbody>
<tr>
<td>The policy as worded lacks the clarity to be effective. The Royal Mail site on Barrack Road is shown to be partly in/partly outside (Figure 8.1) the 'Edge of Town Centre boundary'. Given that proposals for the re-use of the site use the entire site, it appears unpractical to split the site in this way. It is unclear as to what is defined as 'private car parking'. We would expect that this would not include car parking in a supermarket that was available for customers and for the Central Area generally. The policy approach is not justified in PPS12 terms. Car parking standards for Class A1 shops (1 space per 25 sqm) at Appendix E is considered to be overly restrictive not consistent with the Council's stated recognition</td>
<td>It is recognised that the site is part in and part outside. Given the lack of public car parking in the vicinity and the relatively poor links to the town centre for the purposes of parking, it is considered it is probably more appropriate for the site to be regarded not as edge of centre. There appears to be some confusion over what is considered private car-parking. It was not intended that this should include car parking for developments delivered by the private sector which would, such as the Grosvenor Centre, be open for general public use subject to payment of a fee. The intention was to not allow free additional dedicated private car parking that would not be open to the public, as this is considered to be a waste of land and would potentially undermine an integrated transport strategy to support additional public transport. In any case it does not relate to Barrack Road as it is not a town centre site. Consultation with NCC will provide clarity on the appropriateness of parking standards. Government has made it clear that parking standards will be determined locally.</td>
</tr>
<tr>
<td>The no additional private car parking for non-residential development is too risky as</td>
<td>Policy 10 does not preclude opportunities for additional parking spaces; it does allow</td>
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it would be a barrier to get property let to a high-end user. Whilst it is accepted that the parking would be at a significantly lower level than that required for out-of-centre development it needs to be recognised that parking close to buildings will be required for customers and for limited staff parking. The car parking policy needs to be a phased approach taking account of the regeneration agenda.

The car parking standard (maximum) for Hospitals (Appendix E Table E.1 Use C2) should reflect the higher education standard. Without this standard being changed, patients would not be able to park, staff would not be able to park - the hospital could not function.

The supporting text to Policy 10 should refer to the need for the enhancement of existing and / or the development of new walking and cycling routes to be subject to the principles of green infrastructure (GI) design.

This enhancement was not taken forward in the CAAP as strategic policy within the West Northamptonshire Joint Core Strategy already establishes the standards development must follow in the provision of GI

Policy 10 requires all development subject to a transport assessment to undertake a walking / cycling audit which considers links to ‘other major attractors’. The policy could be enhanced by stipulating ‘other major attractors including educational and life long learning outlets’

This enhancement was not taken forward in the CAAP as the Policy was revised to provide greater clarity of the policy requirements and therefore the proposed enhancement was no longer pertinent.

5. SUSTAINABILITY APPRAISAL

5.1 Policies 6,7,8 and 9 were appraised together as a transport ‘strategy’. The Appraisal found that the policies are not predicted to have any ‘significant’ or ‘minor’ negative impacts. They are predicted to have ‘significant’ positive impacts for the Labour Market and Economy and for Material Assets. ‘Minor’ positive impacts are anticipated for Air Quality and Noise; Archaeology and Cultural Heritage; Crime and Community Safety; Energy and Climate; Biodiversity, fauna and flora; Health and Well Being; Populations; Social Deprivation; Soils, Geology and land Use; Waste; Water and Education and Training.

5.2 No mitigation measures are identified though two enhancements measures have been proposed:

- The supporting text to Policy 10 should refer to the need for the enhancement of existing and / or the development of new walking and cycling routes to be subject to the principles of green infrastructure (GI) design.

This enhancement was not taken forward in the CAAP as strategic policy within the West Northamptonshire Joint Core Strategy already establishes the standards development must follow in the provision of GI

- Policy 10 requires all development subject to a transport assessment to undertake a walking / cycling audit which considers links to ‘other major attractors’. The policy could be enhanced by stipulating ‘other major attractors including educational and life long learning outlets’

This enhancement was not taken forward in the CAAP as the Policy was revised to provide greater clarity of the policy requirements and therefore the proposed enhancement was no longer pertinent.
6. POLICY FORMULATION

POLICY 6 - INNER RING ROAD

6.1 A number of evidence base documents such as the BDP Design, Development and Movement Framework, the Public Realm Implementation Framework and the Space Character Assessment have highlighted the barrier that is currently created by the design and character of Northampton’s inner ring road. In particular, the severance created between the town and the community of Spring Boroughs, but also the Mounts located immediately north of the Central Area and the regeneration opportunities planned for the Waterside. These issues were also highlighted in the public consultation at all stages, where severance that is created by Horse Market is a particular concern.

6.2 The current character of the ring road is highly engineered, with the BDP report describing it as “a concrete collar” to the town. The ring road is an integral part of Northampton’s road network and there are areas that, even with past-engineered solutions, suffer from high levels of congestion. The VISSIM Model has been developed specifically for the Central Area to ascertain the hotspots on the highway network where delay is most likely to occur following the implementation of the regeneration projects identified in the Central Area Action Plan.

6.3 The modelling results for the present day support the notion that that the inner ring road is heavily used by traffic and there are hot spots where ‘delay’ is an issue. However, the ‘delay’ for Northampton it is not dissimilar to that of other comparative town centres across the country, but increasing congestion will become an issue if no interventions are implemented. When the VISSIM model was ‘growthed–up’ to take account of the CAAP proposals for 2026 it showed that the existing network would struggle to accommodate the resulting volume of traffic, this situation was worse in the pm peak.

6.4 A number of ‘options’ in terms of junction improvements and signal optimisation have been tested and the results show there are ways to retain capacity and improve flow. The results show reduced delay and greater capacity during morning peak. Large time savings were achieved at a number of junctions through signal optimisation. However, it is apparent that isolated junction improvements have a wide reaching impact on rest of network, which may not be beneficial. Therefore mitigation considerations need to have due regard to the entire network to avoid detrimental knock on effects to other routes / junctions.

6.5 As noted above, the technical assessment from the VISSIM modelling does need to be interpreted with caution as it is unable to present with accuracy the way traffic is likely to redistribute internally and externally around the Central Area; it is a ‘fixed-route’ model. Knowing whether drivers are using the Central Area network as a through route or as a means to entering and stopping in the Central Area is important; it provides an understanding about the number of vehicles the network can support.

6.6 In relation to the wider movement around the town, significant modelling has been undertaken for the Joint Core Strategy using the Northampton Multi Modal Model. The results show what the impact of additional trips generated by CAAP and other development planned for the town through the Joint Core Strategy. Overall, there is an increase in demand for trips with a destination point within the Central Area, as well as a general increase in the total number of trips across the whole of the network. The modelling shows the greatest increase on the London Road; the Bedford Road and the
Harborough Road with the lowest increase in the West. This latter being due to the North West Bypass proposed to support development on the western edge of the town.

6.7 The modelling identifies key congested junctions and areas within the Central Area, such as Regent’s Square, Becketts Park as well as on the radial routes leading to the town centre, in particular the Kingsthorpe Corridor. However, the modelling does not suggest a strategy for improvement of these junctions or a priority order. An overarching strategy is being developed by Northamptonshire County Council and the Joint Planning Unit.

6.8 In conclusion, the technical evidence suggests that removing capacity from the inner-ring road is not a viable option in the immediate future, but that interventions and optimisation to ensure the existing capacity is maximised is required. However, retaining capacity does not mean that interventions to improve the appearance, character and improve pedestrian accessibility to areas beyond the ring road can not be implemented. The Character Study is clear that the car should not dictate movement and there should be better connectivity, legibility and the ability to encourage more sustainable modes. The assessment further highlights the need to avoid subways and advocates the creation of seamless ‘straight across’ layouts, wide crossings, shared spaces and a boulevard setting as ways to overcome severance.

6.9 Owing that there is an acknowledged issue with the way traffic circulates and travels through the Central Area, it is proposed to develop supplementary guidance to address the issues and allow a place-specific approach to be implemented in the different areas of the inner ring road. For example, the need to promote Southbridge as a focal location for the river compared to the solutions required to integrate the community of Spring Boroughs with the town centre require different design approaches which are too detailed for the broad framework of the Central Area Action Plan. By providing additional guidance through an SPD, it will be possible to deliver an integrated approach for the whole of the inner ring-road, rather than piecemeal interventions.

POLICY 7 – BUS INTERCHANGE: FISHMARKET

6.10 This policy is for a major development site and is to be found in a separate Technical Paper

POLICY 8 – SAFEGUARDED PUBLIC TRANSPORT ROUTE

6.11 Within the Central Area a rail corridor exists between Castle Station and Brackmills; it forms part of the western boundary of the Central Area. The route used to provide services through to Bedford, and a large proportion of the route has not been used for a number of years. Due to development at the Bedford end of the branch and the limited approaches for rail connected sites in the Brackmills area, both Northampton Borough Council and Northamptonshire County Council believe that there is no reasonable prospect of trains using this part of the rail corridor. Furthermore, its present designation as “operational” railway has negative implications for other regeneration sites within the CAAP, such as the Nunn Mills and Waterside area.

6.12 However, the council do recognise the potential for this route and, in terms of linking the Town Centre with Brackmills via the Waterside, Northamptonshire County Council have identified this particular route within the ‘Arc’ document in order to prevent serialisation of what could become a vital route for public transport in the future.
POLICY 9 – PEDESTRIAN AND CYCLE MOVEMENT FRAMEWORK

6.13 In order to support pedestrian and cycle movement within the central core, it is important to ensure that the area is as legible as possible for pedestrians and cyclists. As with the formulation of Policy 6, the evidence base including the BDP Design and Development Movement Framework and the SPACE characterisation study highlight the particular areas where movement is particularly fragmented for those users of the town not accessing the area by car; Spring Boroughs, the Mounts and the Waterside. As noted above, the evidence suggests measures that should be avoided to ensure that previous unsuccessful interventions are avoided such as subways.

6.14 Aside from the severance issues, addressed in Policy 6, the design studies (BDP - Design, Development and Movement Framework (DDMF) and Public Realm Implementation Framework; Space - Character Assessment) highlight concerns associated specifically with the pedestrian and cycling environment. All three studies emphasise that access to and circulation around the town centre for pedestrians and cyclists is poor, cycle facilities are limited and inadequately identified and the townscape, on many of the main routes within the town centre, are uninviting. The removal of barriers to encourage greater permeability into and around the town for pedestrians is stressed as a primary goal. The DDMF notes that improvements to the pedestrian environment will encourage people to visit the town and stay longer, enhancing the growth potential of the town.

6.15 The evidence base establishes the need to significantly enhance the pedestrian routes that cross the town. The DDMF proposes a transport strategy (Fig 1) that would see the introduction of three general types of carriage way; pedestrian only, pedestrian priority and 20 mph routes. The aim of the strategy is to break down severance for pedestrians; improve public transport facilities and circulation; increase the efficiency of the highway network and maximise opportunities for new development. This theme is carried through the Public Realm Implementation Framework (Fig 2) and into the Character Assessment. The Character Assessment refines the approach, designating a simplified movement corridor (Fig 3).

6.16 The proposals set out in the evidence have been used as the basis to develop the Pedestrian and Cycling Movement Framework (Fig 4). Maps of the Central Area were then analysed to identify existing and future ‘main destinations’ i.e. places people are most likely to visit for shopping, leisure or recreational purposes. The Framework was adjusted to ensure comprehensive connectivity between these and other main attractors e.g. Castle Station, Bus Interchange, the Hospital.

6.17 The Framework was honed by examination of the Green Infrastructure Strategic Framework Study: making the Connection (LDA Design 2006) which establishes a Movement Network for Northampton and a Strategic Green Infrastructure Framework for the County. Further detail has been incorporated from the Northampton Cycle Development Plan (NCC 2010). The Cycle Development Plan provides an illustration of where improvements for cyclists are needed.
Fig 1: Proposed carriageway types to enhance pedestrian routes
Design and Development Movement Framework (BDP 2006)

Fig 2: Proposed carriageway types to enhance pedestrian routes
Public Realm Implementation Framework (BDP 2007)

Fig 3: Major Movement Corridor Diagram
Character Assessment & Tall Buildings Strategy (Space 2010)
6.18 The CAAP provides a strategic overview for the Central Area, therefore, the Pedestrian and Cycling Movement Framework has been refined to show the principal movement framework for the Central Area. The refinement process included informal discussions among partners including the County Council, West Northamptonshire Development Corporation and River Nene Regional Park. Developer contributions for pedestrian and cycleway improvements should not be limited to the strategic framework but the routes illustrated are considered as priority for improvement. Finer-grain detail can be found in the relevant Major Development Site Policies (Section 6.1) of the CAAP and illustrated in the Development Principles shown in Figures 6.1 to 6.16.

**POLICY 10 - PARKING**

6.19 The provision of Central Area parking is a service that enables people to access and enjoy the range of facilities situated in the town centre. Parking is a key tool for supporting the local economy and it assists in managing travel demand. However, to minimise congestion and improve the quality of the Central Area, modal shift is to be promoted and encouraged. The Parking Policy has been developed to utilise the existing parking stock efficiently, to improve traffic circulation and to ensure future parking management measures are not compromised.

6.20 In terms of evidence base, the Town Centre modelling, Parking in Northampton Town Centre: Recommendations for the Creation of a Future Strategy Report; Northampton Town Centre Parking Strategy: Existing Situation Study and the Northampton Parking Strategy: The Next Stage Project Note all establish the issues associated with parking in the Central Area. The findings have all been used to inform the development of Policy 10 on Parking which, as a result, has been split into three elements:

1. Parking Standards
2. Signage Strategy
3. Contractual Arrangements
Parking Standards

6.21 The evidence shows that in the present day there is a significant surplus of parking relative to demand; peak occupancy does not generally exceed 50%. As a result of this excess capacity, the desire to limit traffic movement within the area bounded by the inner ring road and the desire to not undermine public transport strategies, the CAAP Parking Policy, within the Town Centre Boundary, does not permit any additional private car parking for non-residential development. This is unless there are justifiable reasons for an exception. Within the Edge of Centre Boundary private parking provision will be at a maximum of 50% of the local standards set out in Appendix 5. It is anticipated that in the interim new development should be looking to utilise existing parking stock before determining to create new, additional provision. As well as being beneficial for transport impact, this will maximise land use, avoiding the expense and inefficiency of land take for parking spaces.

6.22 Modelling shows that as new development comes forward there will be an increase in the volume of traffic on the local network. The Northampton Central Area Parking Strategy analysed the impact CAAP Parking Policy would have when applied to future development. The results illustrate that occupancy will reach 90% capacity during peak parking times. This exceeds the desired level of capacity identified within the Study of 85% occupation of parking stock which may, as a result, increase congestion because drivers will circulate the network in search of alternative locations. It is estimated that there will be a theoretical shortage of 500 spaces.

6.23 However, given that the assessment is based on 100% new trip generation i.e a worse case scenario and the future year is 14 years away, it is possible that the need for parking could be met through improved signage, directing cars to the nearest available spaces, the promotion of sustainable travel options and via the introduction of Park and Ride on key corridors into the CAAP area.

Signage Strategy

6.24 The town centre modelling shows that present day delay hotspots at key junctions and on the Inner Ring Road will increase in levels of congestion as a result of new development coming forward. The majority of drivers use a particular car park on a regular basis which they perceive as being closest to their destination. Frequently this entails driving past several parking opportunities.

6.25 The evidence shows that if drivers were intercepted on their arrival and encouraged to park at point of entry over 53% of vehicles would be removed from town centre traffic. All the evidence calls for the development of a signage strategy focused on directing inbound traffic to the first suitable car park. Intercepting traffic in this way would alleviate congestion and / or delay issues. It would have the added benefit of broadening the retail offer to shoppers passing retail opportunities they would not experience if they maintained their regular route.

6.26 Drivers supported the notion of a signage strategy. The consultation response suggested however that signage should not be limited to directions for car parks. In particular responses indicated support for appropriate pedestrian signage from car parks into the town centre and to main destinations to help improve accessibility.
Contractual Arrangements

6.27 Baseline data in the Recommendations Report illustrates that the Council currently control approximately 35% of parking stock. For the Council and NCC as Highway’s Authority to have influence over parking controls and in the delivery of a parking strategy the public sector needs to retain a reasonable market share in parking stock. Therefore, the Recommendations Report suggests that any new development providing parking in the Central Area should enter into contractual arrangements to ensure that any future parking management measures are not compromised.

POLICY 19 - CASTLE STATION

6.28 This policy is for a major development site and is to be found in a separate part of the Technical Paper

7. POLICY DELIVERY

Policy 6: Inner Ring Road

a Funding

7.1 Key delivery and funding mechanisms are:

- NCC as highway / transportation authority and funding partner in the planning design and implementation for a inner ring-road SPD and determining authority for highway applications;

- Northampton Borough Council as the Local Planning Authority responsible for developing planning policy documents in addition to their role as landowners, and the determining planning authority for the redevelopment of the Grosvenor Centre for the Lady’s Lane and Wellington Street Subways; and the principal landowner for the Spring Boroughs area for the subways at Spring Boroughs.

- WNDC as funding partner for parts of the ring road related to key regeneration site;

- Legal and General as the developer for the Grosvenor Centre subways.

b Partnership

7.2 The above organisations are likely to have to work together closely to ensure that the SPD is produced with an appropriate evidence to support the design solutions and to ensure that master planning and planning applications can contribute to the over-all design aspirations for the inner ring road.

c Timing

7.3 Developing the evidence base for the SPD has already begun and will be supplemented by additional information and evidence coming forward. Major applications are already being made and these will need to contribute to the over-all design aspirations for the ring-road.
Policy 8: Safeguarded Public Transport Route

a  Funding

7.4 Should the land be released from operational rail land, it is expected that funding from public and private bodies will be required to develop the continuous public transport/cycle and walking route between the town centre and Brackmills.

b  Partnership

7.5 It will be necessary to work in partnership with Network Rail to understand future plans for the rail line, WNDC as part of their regeneration remit within Avon / Nunn Mills and Northamptonshire County Council as the transport authority.

c  Timing

7.6 WNDC is working closely with Network Rail to address the long term viability of the line for rail use. This is tied in with their promotion of the Avon/Nunn Mills / Bedford Road junction improvements and the Compulsory Purchase Order currently being progressed for the development site and land needed to deliver the new access road.

Policy 9: Pedestrian and Cycling Movement Framework

a  Funding

7.7 Key delivery and funding mechanisms are:

- NCC as highway / transportation authority and funding partner in the planning design and implementation and the determining authority for highway applications;

- Northampton Borough Council as the Local Planning Authority in addition to its role as landowners for the redevelopment of the Grosvenor Centre for the Lady’s Lane and Wellington Street Subways; and the principal landowner for the Spring Boroughs area for the subways at Spring Boroughs.

- WNDC as funding partner for parts of the ring road related to key regeneration site;

- Legal and General as the developer for the Grosvenor Centre subways and contributions from other developments (either via S106 or other means) from those granted permission within the Central area that meet the thresholds in the policy.

b  Partnership

7.8 The above organisations are likely to have to work together closely to ensure that the policy is delivered and implemented in a co-ordinated and effective way. Links between the key destination/development sites, transport interchanges and leisure will also be a priority.
c Timing

7.9 The implementation of the policy will be ongoing, with periodic review and monitoring of how the pedestrian and cycle framework is progressing. The policy will also relate to the implementation of the Public Realm improvements.

Policy 10: Parking

a Funding

7.10 Key delivery and funding mechanisms are:

- Northampton Borough Council as the Local Planning Authority and the landowner and manager of Car Parks
- NCC as highway / transportation authority

b Partnership

7.11 The above organisations are likely to have to work together closely alongside applicants who wish to deliver car parking in association with their developments. NCC will need to assist in developing an appropriate signage strategy (as per the Parking Strategy) to direct traffic and pedestrians. NBC will be responsible for ensuring an appropriate pricing structure within their own car parks and assisting with the delivery of supporting signage and other physical changes.

c Timing

7.12 The Car Parking Strategy will be implemented with the adoption of the CAAP, with applications being determined against the criteria set out within Policy 10. The implementation and review of options will be periodically reviewed as per the monitoring framework.

8. CONCLUSION

8.1 The conclusion for Policy 7 Bus Interchange and Policy 19 Castle Station is addressed elsewhere in the supporting technical paper.

8.2 Transport modelling indicates that removing capacity from the inner ring road is not currently a viable option. However, to avoid future congestion issues mitigation measures will be required. Modelling shows that junction improvements and signal optimisation can retain capacity and improve flow but highlights how isolated schemes can have detrimental knock-on effects to other routes and junctions.

8.3 Design studies emphasise the severance issues caused by the inner ring road and the poor public realm in most sections. Mitigation to improve connectivity and legibility and encourage modal shift includes the removal of subways, creation of seamless, straight across layouts, wide crossings, shared spaces and boulevard settings. Policy 6 will ensure an integrated and coordinated approach to a character change for the ring road. By providing detailed designs the supplementary guidance will enable a place-
specific approach to resolving capacity issues whilst improving the appearance and pedestrian / cycling accessibility.

8.4 The design studies also stress that access to and circulation around the town centre for pedestrians and cyclists is poor; cycle facilities are limited and inadequately identified and the townscape is uninviting. The evidence establishes the need to significantly enhance the pedestrian and cycle routes that cross the town. Policy 9 establishes a Pedestrian and Cycle Movement Framework for the Central Area that will improve accessibility and permeability. In addition the policy determines a mechanism to ensure the enhancement of existing and or / provision of new routes will be provided as a result of new development.

8.5 The use of the old railway line between Castle Station and Brackmills has been identified as an opportunity to improve public transport / cycle connectivity between the Town Centre and Brackmills. In accordance Policy 8 safeguards it, protecting the route against loss or sterilisation in anticipation of its role for sustainable transport in the future.

8.6 Currently peak time parking occupancy does not generally exceed 50% of parking provision in the Central Area. The volume of traffic will increase as a result of future development but the evidence provides that the parking need could be met through other sustainable travel options and potentially via the introduction of Park and Ride on key corridors into the Central Area. In support of this view Policy 10 restricts any further private, non-residential parking within the town centre unless exceptional reasons for provision apply. This approach will ensure that existing parking stock is used to full potential and maximise land-use efficiency by avoiding land take for unnecessary parking spaces

8.7 The evidence has shown that drivers will often drive past ‘point of entry’ car parks to select a location they perceive as closest to their destination. This results in unnecessary trips on the local network adding to delay and congestion problems. Data counts show that point of entry parking could remove over 53% of vehicles from town centre traffic. A signage strategy is recommended, one that focuses on directing inbound traffic to the first suitable car park. Policy 10 establishes the premise to improve signage both from the approach roads and for pedestrians from car parks into town centre and towards major destinations.

8.8 The Council currently controls 35% of parking stock in the Central Area. The Council must retain a reasonable market share in parking stock to have influence over parking controls and in the delivery of a parking strategy. Therefore Policy 10 establishes the need that any additional private, non-residential development providing parking will enter contractual arrangements to ensure future management measures are not compromised.
1. INTRODUCTION

a. Context

1.1 Northampton town centre has many positive attributes including its heritage assets and niche retailing. It currently accommodates a large indoor shopping centre, which fronts onto both a historic Market Square and a pedestrianised Abington Street. It also accommodates a wide range of leisure and pub/restaurant facilities/services including a theatre, a museum and historic churches.

1.2 However, Northampton town centre is in need of regeneration and new investment to improve its quality and offer, and help meet future population requirements. This is highlighted by the amount of leaked expenditure from Northampton to other retail centres inside and outside the Northampton Borough. For example, Milton Keynes and Wellingborough attract 11% and 5.5% of comparison goods retail expenditure respectively, and Weston Favell and Riverside Retail Park attract 11.4% and 5.8% respectively, all centres are within Northampton’s retail catchment area.

1.3 Undoubtedly the development of out-of-centre retail parks such as Riverside and Weston Favell have had the most negative impact on the performance of Northampton town centre. This is primarily because of their high proportion of combined comparison retailing coupled with free parking provision. The Northampton Local Plan 1997 had a lack of direction and strength in policy at a strategic level in terms of supporting the town centre as the primary focus of retail and main town centre uses, plus a lack of identification of appropriate town centre retail sites. This could perhaps be cited as possible reasons as to why out-of-centre retail parks with large provisions of comparison floorspace have become common place in Northampton. The CAAP together with the West Northamptonshire Joint Core Strategy (WNJCS) provides both generic retail policies (Policies 11, 12, 13 and 14) and site specific policies (Policies 17, 18, 31 and 32) to bring the focus of retail development back into the town centre to aid its wider regeneration.

b. Retail Policy aims

1.4 There are 2 key issues to address when preparing these retail policies.
i. The regeneration of Northampton town centre. The town needs to expand and modernise in order to meet occupier requirements and sustain competition from out-of-town retail parks. The consequence of a poor retail offer in the town centre has been the significant growth of out-of-centre floorspace as retailers have not been able to find suitable accommodation in the town centre. There is a clear qualitative deficiency within Northampton town centre which should be addressed as soon as possible to ensure Northampton fulfils its role in the sub region and delivers an improvement to the overall range of shopping provision in the town. Evidence to date demonstrates that out-of-centre retail parks including Riverside Retail Park pose the biggest threat to the town centre in terms of spending power. By expanding and providing more modern facilities, more investment will be generated resulting in an increase in both the retail offer and quality.

ii. Increasing the retail capacity in Northampton town centre. With the proposed increase in population derived from the housing growth proposed by the Pre-Submission WNJCS up to 2026 there is a need to ensure that the town centre is capable of meeting such requirements. The evidence base for policy development in the CAAP and the WNJCS provides the quantum of retail development that needs to be accommodated in the town centre to aid its growth in a sustainable manner.

1.5 The CAAP retail policies were formulated to ensure that the town centre takes on a stronger retailing role within Northampton and its wider region. This approach reflects both national and regional guidance as well as more locally derived objectives set out in the Council’s Corporate Plan and the emerging West Northamptonshire Joint Core Strategy. The approach set out in the CAAP is to:

- Define a boundary for the town centre which provides a basis for applying an impact assessment, with the objective of strengthening Northampton town centre’s position when facing competition from out-of-town retailer sites (Policy 11)
- Define the boundary for the Primary Shopping Area and its primary and secondary shopping frontages to provide clarity on where A1 retail use should be dominant and where flexibility can be applied (Policies 12 and 13)
- Allocate suitable and viable sites for retail development / regeneration to provide for future demand and to reflect national policy guidance by increasing and improving the retail quality and offer for Northampton town centre (Policies 14, 17, 18, 32)
- Provide policy direction on the future use and public realm impacting on the Market Square (Policy 31)

2. PLANNING POLICY CONTEXT

National Planning Policy

National Planning Policy Framework (March 2012)

The NPPF requires planning policies to be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. NPPF requires local planning authorities to:

- Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages
- Retain and enhance existing markets
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in the town centres

Apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan

When assessing applications for retail, leisure and office development outside town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (default threshold is 2,500 sq.m)

retain and enhance existing markets and, where appropriate, reintroduce or create new ones, ensuring that markets remain attractive and competitive

Regional Planning Policy

Regional Plan for the East Midlands: Regional Spatial Strategy 8 (RSS8) (March 2009)

RSS8 requires the CAAP to make the Central Area the focus for a range of uses and contribute towards improving the range and quality of retail provision by increasing comparison and convenience floorspace. The retail policies in the CAAP conform to this requirement.

Strategic Planning Policy

Pre Submission West Northamptonshire Joint Core Strategy (WNJCS), (February 2011)

The Vision states that Northampton is to be repositioned as the key economic driver at the cultural heart of the sub-region. Amongst others, it will fulfil its role within the retail, entertainment and employment industries. Policies N1 and N2 of the West Northamptonshire Joint Core identify Northampton town centre as the focus for all town centre uses. In addition, Policy N2 identifies retail capacity in Northampton town centre for convenience and comparison retailing. The provision for future retail floorspace requirements that will be set out in the JCS is addressed in the CAAP.

Corporate Plan 2012 – 2015

These retail and associated site specific policies will contribute to the following priorities and outcomes:

- Priority 1: Northampton on track – an economically prosperous, successful and vibrant Town; delivery with partners of major regeneration projects, such as the redevelopment of Grosvenor Greyfriars; the promotion and preservation of the Town’s history, heritage and culture
- Priority 2: Celebrating our heritage and culture – increased tourism

3. KEY EVIDENCE BASE AND POLICY FORMULATION

3.1 The following technical evidence bases have been used to formulate the retail policies. Explanatory notes relating to each evidence base are provided for each of the retail policies.
a. Defining the Town Centre Boundary (part of Policy 11), Primary Shopping Area and Shopping Frontages (Policy 12, Policy 13)

Town Centre Frontages and Primary Shopping Area Technical Report, 2010 (Northampton Borough Council)

Shopping Frontages & Primary Shopping Area (Policy 12)

3.2 A key element of developing, managing and improving the retail offer in Northampton town centre is provided through designating the Primary Shopping Area and updating current shop frontage allocations. The table below shows the shopping frontages to be brought forward through the Central Area Action Plan. The justification for the location of the Primary Shopping Area and each Shopping Frontage designation can be seen in the Town Centre Frontages and Primary Shopping Area Technical Report. The Town Centre Frontages and Primary Shopping Area Technical Report underwent a formal 6 week public consultation in February 2010.

<table>
<thead>
<tr>
<th>Primary Shopping Frontage</th>
<th>Secondary Shopping Frontage</th>
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<tbody>
<tr>
<td>• The Grovesnor Centre</td>
<td>• Gold Street</td>
</tr>
<tr>
<td>• Peacock Place</td>
<td>• St Peters Square</td>
</tr>
<tr>
<td>• Abington Street East &amp; West (as far as St Giles Terrace)</td>
<td>• Mercers Row</td>
</tr>
<tr>
<td>• Market Square North &amp; East</td>
<td>• Wood Hill</td>
</tr>
<tr>
<td>• The Drapery</td>
<td>• Market Square South &amp; West</td>
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<td></td>
<td>• St Giles Street</td>
</tr>
<tr>
<td></td>
<td>• Fish Street</td>
</tr>
<tr>
<td></td>
<td>• The northern end of Derngate</td>
</tr>
<tr>
<td></td>
<td>• The northern end of Abington Street</td>
</tr>
<tr>
<td></td>
<td>• Abington Square</td>
</tr>
</tbody>
</table>

3.3 The adopted Northampton Local Plan 1997 establishes a primary and secondary shopping frontage % A1 thresholds of 90% and 60% respectively. In a response to current market conditions in the town centre and a need to diversify uses on some frontages, CAAP policy reduces the primary frontage threshold to 80% and maintains the 60% threshold on secondary frontages.

Town Centre Boundary (Policy 11)

3.4 Main town centre uses will be focused within the boundary of the town centre, as defined on the proposals map. This boundary encompasses all Shopping Frontages and the Primary Shopping Area, and will be used to assist in identifying sequentially preferable sites within the Central Area. The Town Centre Boundary is deemed appropriate taking into account; the physical severance created by the ring road, the high intensity of a mix of land uses within the area, and the fact that the boundary creates a compact area for the focus of town centre uses.

Northampton Town Centre Shopping Survey, 2010 (Northampton Borough Council)

3.5 The Shopping Survey provides a street by street guide to the type of Use Class which is occupying the ground floor of units in Northampton Town Centre. The survey,
updated every 6 months, was a key consideration in designating primary and secondary shop frontage and the primary shopping area in the town for Policy 13.

b. Setting the threshold for an impact assessment (part of Policy 11)

West Northamptonshire Retail Study update (Roger Tym & Partners, February, 2011)

3.6 This study confirms that Northampton suffered a significant level of out-of-centre floorspace growth in recent years to such an extent that the combined share of out-of-centre floorspace is higher than the town centre market share. It adds that the cumulative outcome of a number of smaller schemes could potentially cause a detrimental impact. To address this issue, it was recommended that a reduced threshold of 1,000 sq.m gross be set for impact assessments. The NPPF sets the threshold at 2,500 sq.m.

3.7 Policy 11 of the pre-submission draft Central Area Action Plan referred to the threshold being used for sequential testing. This is incorrect; it should use this figure as the threshold for impact assessments, in conformity to the National Planning Policy Framework. The consultation responses to the pre-submission draft highlighted this error and this has been addressed accordingly. Through amendments to the policy wording which was subject to consultation as part of the Focused Changes to the CAAP.

3.8 For the Submission CAAP, the second paragraph of Policy 11 has therefore been revised to read:

*Developments of main town centre uses of more than 1,000 sq m gross proposed outside the town centre boundary will be subject to an impact assessment.*

c. Meeting Retail Capacity (Policy 14)

3.9 To address the current deficiencies of Northampton’s Primary Shopping Area, meet future population requirements, and increase its resilience to out-of-centre, or alternative centre competition, the Central Area needs to provide a substantial amount of retail floorspace in the period to 2026.

3.10 Evidence shows that the Central Area has capacity to provide for both comparison and convenience retailing. Policy 11 refers to this requirement. However, the CAAP is focusing on allocating sites for comparison retailing for the following reasons:

- The Central Area’s biggest threat is out-of-centre comparison retailing. Therefore there is a greater need to ensure that comparison retailing is secured in the early phases of the plan period
- There are existing sites in the Primary Shopping Area which have been converted from comparison to convenience in the last 3 years, including Tesco Express in Abington Street and part of the post office in St Giles Street
- Once the CAAP is adopted, it will be reviewed and the opportunity will arise to review the capacity and need for convenience retail and subsequent site allocation. Whilst there are sites within the town centre boundary which can accommodate additional convenience retailing, allocation at this time could prejudice the regeneration of the town centre and the PSA
3.11 Retail capacity figures for West Northamptonshire have been established by the Pre-Submission WNJCS, as referenced in Section 2 of this paper. The capacity figures and hierarchy of centres have been established by the West Northamptonshire Retail Study Update (Roger Tym & Partners, February, 2011). This study builds upon and updates the West Northamptonshire Retail Study (CACI, March 2009). A further review of these studies in support of the Joint Core Strategy is expected to be completed by the summer of 2012.

3.12 The updated Retail Study identifies a net increase of 45,000 sq.m (61,000 sq.m) over the period to 2021 within the Central Area. The CAAP however identifies this amount to be delivered by 2026. This is because the Grosvenor Centre redevelopment remains the focus for regenerating the Primary Shopping Area. With work on the planning application already underway, it is anticipated that this development will be completed by 2018. Once completed, the redeveloped Grosvenor Centre will contain additional floorspace, some of which could be larger floorplates, making them attractive to existing occupiers within the Drapery and Abington Street. This means that the additional sites identified for retail could become available for regeneration. Practical site specific delivery issues, aligned with market sentiment means that it is very unlikely that all 61,000 sq.m gross can be delivered by 2021.

3.13 Three sites (Grosvenor Centre, Abington Street East and the Drapery) have been identified as viable and deliverable for allocation within the plan period.

i) Grosvenor Centre (Policy 17)

Evidence Base

Central Area, Design and Development Framework (BDP & CBRE, November 2006)

3.14 This study identifies a series of destinations in the town centre to act as flagship schemes for the wider regeneration of Northampton town centre. The Grosvenor Centre / Greyfriars bus station site was identified as a major contributor towards the improvement of the attractiveness of the town centre. The study suggested that Grosvenor / Greyfriars redevelopment will:

- Increase the retail floorspace available in the town centre, including the provision of larger floor plates which are essential in attracting anchor stores and key retailers. The extension of the Grosvenor Centre would provide up to 37,000 sq.m of additional retail and leisure floorspace
- Strengthen the links and connections between the town centre and surrounding areas including The Mounts and Spring Boroughs; and
- Create streets and buildings rather than an enclosed and inward looking shopping mall.

Retail Strategy for Northampton Town Centre (CACI, May 2008)

3.15 This study identifies and analyses the shopping catchment area of Northampton town centre and the shopping centres it competes with for trade. The conclusion of the study stressed the need for an extension to the Grosvenor Centre to avoid further decline in retailing in Northampton town centre.

Northampton Central Area Action Plan Submission Version May 2012
Northampton Town Centre Healthcheck, 2009 (Roger Tym & Partners)

3.16 The Healthcheck concluded that Northampton town centre needs a broader range of comparison outlets, with some being of a higher quality than that currently exists. These types of operators usually require larger modern units in central locations. At present, these opportunities are limited in the Central Area. The Healthcheck reinforces the need for the delivery of the Grosvenor Centre extension which would result in up to 37,160 sqm (gross) additional comparison floorspace provision in the town centre.

3.17 The Healthcheck also made recommendations regarding the updating of shopping frontages and the designation of a Primary Shopping Area.

Policy Formulation

3.18 The Grosvenor Centre Redevelopment site forms a substantial part of the Central Area. The area includes the current purpose built Grosvenor Shopping Centre (built in the early 1970s), the Greyfriars bus station and associated land with offices above, vacant land adjacent to the west and east, the Mayorhold multi-storey car park, together with associated land including subways and the Upper Mounts surface level car park on Victoria Street. Predominantly this land is owned by the Council and Legal & General.

3.19 The site has been identified for redevelopment for the following reasons:

- The Grosvenor Centre is the principal shopping centre for Northampton and encompasses a significant proportion of the Primary Shopping Area’s primary shopping frontage.

- Despite some recent investment the Grosvenor Centre is beginning to show its age. It is not of a design or layout that can easily be adapted to accommodate modern retailers’ needs and the demand that exists for new retail premises in the Central Area. The town would benefit from investment to increase the retail offer and upgrade the provision.

- The Grosvenor Centre and adjoining Greyfriars bus station are bulky and monolithic and unsympathetic to their surroundings. The external areas around the Grosvenor Centre and Greyfriars bus station limit north-south pedestrian permeability and

- Evidence shows that the town centre needs to improve its quality and offer in order to be competitive with out-of-town retail parks. Commissioned studies concluded that the redevelopment of the Grosvenor Centre is essential to meeting these aims. The town needs a broader range of larger comparison outlets to attract national multiples to the town and improve its overall retail offer and experience.

3.20 The Council recognises the need to cater for long term retail demand and the opportunities that can arise in reducing the financial liability of the current bus station. It also understands that there can be potential significant improvements made to the townscape as a result of the redevelopment of its property and landholdings.
3.21 Legal & General has an interest in enhancing the value of their substantial investment in the Grosvenor Centre. An extension would allow the offer additional floorspace to be provided within the town centre, for which there is capacity and to provide an additional draw to the existing centre, but also potentially to allow the flexibility to reconfigure the existing centre so that it is better suited to the needs of modern retailers.

3.22 The signing of a Development Agreement in 2009 between Northampton Borough Council and Legal & General confirms their commitment to the delivery of this project.

**ii Drapery (Policy 32)**

*Evidence Base*

Central Area Sites Feasibility Study (Roger Tym & Partners/Gerald Eve; July 2010)

3.23 The findings of this report were used to identify sites which would meet the need for additional development of main town centre uses (particularly retailing) over the period to 2026.

*Sites Assessed*

<table>
<thead>
<tr>
<th>Site</th>
<th>Proposed development</th>
<th>Floorspace (sq.m gross)</th>
</tr>
</thead>
<tbody>
<tr>
<td>St Katherine’s Parcel 1</td>
<td>Comparison retail or a supermarket</td>
<td>3,000 or 6,020</td>
</tr>
<tr>
<td>Notre Dame</td>
<td>Comparison retail</td>
<td>7,800</td>
</tr>
<tr>
<td>Drapery Parcel 1</td>
<td>Comparison retail</td>
<td>13,750</td>
</tr>
<tr>
<td>Drapery Parcel 3</td>
<td>Comparison retail</td>
<td>3,000</td>
</tr>
<tr>
<td>St Peter’s Parcel 1</td>
<td>Supermarket (convenience retail)</td>
<td>4,400</td>
</tr>
<tr>
<td>St Peter’s Parcels 1 – 6</td>
<td>Comparison retail</td>
<td>7,740</td>
</tr>
<tr>
<td>Broad Street Parcels 1-4</td>
<td>Complete redevelopment comprising:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Comparison retail</td>
<td>4,370</td>
</tr>
<tr>
<td></td>
<td>• Residential</td>
<td>13,110</td>
</tr>
</tbody>
</table>

3.24 The Grosvenor Centre was excluded from this process as the signed Development Agreement for Grosvenor Centre means that assumptions can be made about its delivery.

*Sites selected*

3.25 In addition to the proposed redevelopment of the Grosvenor Centre, the pre-submission draft policy included 2 key sites for additional redevelopment opportunities, which are:

- the former Fishmarket and its surrounding area, and
- buildings and land along the Drapery and College Street

3.26 These were selected because:
• the Fishmarket area is owned mainly by the Borough Council so its delivery is more manageable
• there is a probability that some of the existing units in the Drapery may be transferred to the new Grosvenor Centre. This leaves the Drapery open to opportunities for redevelopment when the units become vacant

3.27 The contents of the pre-submission draft Policies 18 and 32, and the accompanying illustrations therefore provide the development principles for both the Fishmarket and the Drapery. Both policies contain the quantum of development required and outline the design requirements in line with pre-submission draft Policy 1.

Sites rejected

3.28 The Feasibility identified other sites as being viable. However, these have not been included in the Central Area Action Plan because:

• They are located within sites which are outside the Primary Shopping Area and their allocation could potentially affect the effective regeneration of the town.
• The sites currently contain heritage assets which make large scale redevelopment potentially undeliverable

Policy Formulation

3.29 Both these sites were allocated for retail redevelopment in the pre-submission draft CAAP in November 2010. The Fishmarket site currently accommodates a range of uses including the Fishmarket gallery, some retail units, a pub and restaurants. The Drapery includes a row of retail and A2 units, small scale employment uses, taxi services and a takeaway unit.

3.30 Since the publication of the CAAP, progress has been made on the Grosvenor Centre redevelopment proposal. The redevelopment relies on the demolition of the Greyfriars Bus Station and its subsequent replacement. A new and accessible bus interchange needs to be capable of accommodating future passenger and operator requirements up to and beyond the end of the Plan period of 2026.

3.31 The Borough Council undertook further work to inform the search for a suitable alternative location for the bus interchange since the publication of the draft CAAP in November 2010. The site subsequently identified as the preferred location is the Fishmarket site, which was previously allocated for retail use. To meet the identified shortfall in future retail provision within the town centre (as identified in the CAAP) the Council was required to identify a viable alternative retail site to replace the shortfall in retail allocation. There are no changes to the Drapery allocation resulting from the proposal to select the Fishmarket site for a bus interchange.
3.32 Since the Fishmarket site is now allocated within the submission CAAP for a bus interchange facility, an alternative retail site needed to be found to ensure that the town centre can still meet the retail requirement identified.

3.33 Abington Street East, comprising the Central Library and adjoining properties, was assessed as being viable and is considered suitable for allocation because it is located within the Primary Shopping Area and they front onto either the primary or the secondary shopping frontages. Also, initial officer based discussions with Northamptonshire County Council concluded that the library site forms part of an ongoing consideration of centralising cultural and educational provisions within the vicinity of the County Hall, through the County Council’s ‘Project Angel’. This means that there is a distinct possibility in the longer term that the library site will become available for regeneration. Initial discussions with both the PCT and NHS Foundation Trust also confirm that consideration is ongoing with regards to the future of their assets. They identified that there are prospects to consolidate not just their physical assets but their services as well. They indicated that they would view options for the St Giles Clinic clinic site positively.

3.34 Policy 18 of the submission CAAP has therefore been revised to substitute the Fishmarket site with Abington Street East. Policy 18 had been formulated, taking into account the future of existing uses and the design of the site.

d. Improving shopfront design (part of Policy 13)

Building Frontage Appraisal – Market Square and Abington Street, Northampton, 2008 (Rodney Melville and Partners)

3.35 This study provides written and visual analysis on history and current quality of all Shop Frontages on the Market Square and Abington Street. In addition, each building frontage also has its own written guidance to help improve and preserve the character when it is subject to future development. The completion of this report reinforced the requirement for CAAP policy to reference the need to improve the design and maintenance of shopfronts in the Central Area.


3.36 This Supplementary Planning Document (SPD) outlines the principles of good design for shops and other units within Northampton town centre and other centres / parades. This SPD is not a set of rigid rules for developers to follow but shows an appreciation and practical understanding of what good design is and how shopfronts can successfully complement the street.
3.37 The Study examines ways to promote the daytime and evening economy in Northampton town centre in combination with bringing forward new usage and events to the Market Square. The study has been produced in conjunction with a Business Plan to help deliver the changes to the town centre and Market Square over the next 10 years.

Policy Formulation

3.38 The Council has prepared a policy for the Market Square to set out its role and function and to guide future proposals which have an impact on this ‘main destination’ for the Central Area.

3.39 This historic Market Square lies in the heart of the town centre. It is a destination in its own right through its function as a market and event space. Recent investment in the public realm and the implementation of a programme of events at the Market Square act as catalysts for future improvement and investment. (Further information on the approach to public realm can be found in the technical paper on Public Realm).

3.40 In terms of its role and function, the Council intends to maximise the potential offered by this asset by encouraging more restaurants and cafes to invest in the properties fronting the Square. The Council sees the Market Square as a unique opportunity for Northampton to differentiate its retail offer from out of town centres and other nearby towns. Policy 31 seeks to enhance the Market Square’s role as a main destination for activities by improving the opportunities within the Market Square and its immediate surrounds.

4. PUBLIC CONSULTATION

4.1 Relevant responses from the public consultations to date have helped shaped the policies further.

a. Issues and Options (September – November 2007)

Defining the Town Centre Boundary, Primary Shopping Area and Shopping Frontages

Feedback from the Issues and Options consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Representations showed a consensus that if Northampton is to fulfil its regional role, new retail floorspace in the town centre. A number of representations highlighted out of centre retailing sites as locations to strengthen.</td>
<td>• CAAP designates a Town Centre Boundary and a Primary Shopping Area to provide a focus for delivering new retail floorspace. Out of centre sites recommended for retail development are not in the Central Area and would therefore be subject to the</td>
</tr>
</tbody>
</table>
• Representations emphasise the importance Northampton’s independent retailing offer. There was general consensus that St Giles Street should remain the primary focus for promoting the town’s independent retailing offer. It was also felt that historic streets such as The Drapery and Gold Street would benefit from an influx of independent retailers.

Sequential Test.

• Policy 13 of the CAAP designates St Giles and Gold Street as secondary shopping frontage, and the Drapery a primary shopping frontage.

4.2 Respondents agreed that the Market Square currently isn’t being exploited to its full potential. To do this, the Market Square should be used as an events space and surrounding shop units should look to complement the market and attract investment from restaurants and cafes. A new focus to the Market Square needs to be provided, a fountain or statue is suggested. The Market Square policy looks to use the Use Classes Order to benefit the vitality and vibrancy of the Market Square by designating some sides of the Square as Secondary Shopping Frontage and allowing permission for more A3 uses.

**b. Emerging Strategy Consultation (August/September 2009)**

*Defining the Town Centre Boundary, Primary Shopping Area and Shopping Frontages*

Feedback from the Emerging Strategy consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Representations were made regarding the need to invest in the overall shopping environment in Northampton, e.g. shop fronts and public realm.</td>
<td>• Policy 13 refers to the need for high quality shopfronts as demonstrated by the Shopfront Design Guide SPD.</td>
</tr>
<tr>
<td>• The Drapery should be designated as a primary shopping frontage due to its historic importance and its proximity to potential sites for retail development e.g. The Grosvenor Centre.</td>
<td>• Policy 3, public realm, priorities Abington Street for public realm improvements.</td>
</tr>
<tr>
<td>• Concern was expressed by respondents on the need to enhance the vitality and viability of Northampton’s town wider retail offer, including out of centre development.</td>
<td>• The Drapery has been upgraded from a secondary frontage in the 1997 Northampton Local Plan to a primary frontage in CAAP policy 13.</td>
</tr>
<tr>
<td>• The CAAP considers delivering retail capacity in the Central Area. The potential for delivering retail floorspace at other locations will be subject to the policy of the WNJCS and NPPF</td>
<td></td>
</tr>
</tbody>
</table>
Meeting Retail capacity

Feedback on the sites put forward to meet retail capacity, outside of the Grosvenor Centre development, can be summarised as follows:

<table>
<thead>
<tr>
<th>Notre Dame (site north of Abington Street)</th>
<th>Fishmarket site and surrounding area</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Development on the site is supported</td>
<td>• Development on this site is supported as this will be a key link between the town centre and Spring Boroughs</td>
</tr>
<tr>
<td>• Site could be remodelled because the site is underused but the Meeting House and graveyards should be protected</td>
<td>• The site is not suitable for food store as it is constrained in size, accessibility and conservation issues. More appropriate for additional comparison retailing</td>
</tr>
<tr>
<td>• The site is not suitable for food store as it is constrained in size, accessibility and conservation issues. More appropriate for additional comparison retailing</td>
<td>• Grosvenor Centre should remain the priority for new retail development and this alternative site should not be redeveloped until the Grosvenor Centre redevelopment has been completed</td>
</tr>
<tr>
<td>• If the food store option is pursued, preference is given to a modest sized store or a variety of smaller food stores and delicatessens</td>
<td>• Redevelopment would lead to regeneration, complementing the Grosvenor Centre, improve facilities for visitors and provide direct access to a revitalised Market Square</td>
</tr>
<tr>
<td>• Site may be more suitable for office development</td>
<td>• Opportunity to improve the setting of the Grade II listed Church</td>
</tr>
<tr>
<td>• Grosvenor Centre should remain the priority for new retail development and this alternative site should not be redeveloped until the Grosvenor Centre redevelopment has been completed</td>
<td>• St Katherine’s Churchyard (also known as the Memorial Square) should be protected</td>
</tr>
</tbody>
</table>

4.3 Other key messages include:

• The Market Square need to be brought back to life and any cultural initiatives should have the Square incorporated into them at every opportunity. Making improvements to shop frontages and ensuring building continue to reflect the rich archaeological and architectural heritage of the Market Square should be central to any improvements made at the Square. The Market Square policy references the need to improve appearance of buildings around the Market Square and reinforces the importance of the wider design and public realm policy within CAAP
• The shopping environment in Northampton town centre needs further investment in order make it an attractive destination. The overall quality and maintenance of shop frontages and the public realm needs improving. The upper floors of buildings and vacant units in the town centre are under utilised and could be made available to new business and students.

4.4 In summary, there were no adverse reactions to the possible redevelopment of the two sites, as long as the historical / heritage elements of the sites are protected. The Central Area Sites Feasibility Study was used to further inform the viability and deliverability of the sites, allowing the Council to dismiss the Notre Dame site because of the potential impacts on heritage.

c. **Town Centre Frontages and Primary Shopping Area Consultation (February-March) 2010**

<table>
<thead>
<tr>
<th>• There was strong overall support for the primary frontages designated in the Technical Paper. A respondent did raise the issue of how designating frontages in general discriminates against A2 uses such as banks which attract high levels of pedestrian footfall.</th>
<th>• Policy 13 in the CAAP lowers the A1 threshold in primary frontage in the existing Northampton Local Plan and recognises the potential positive impacts of non A1 uses on streets of primary frontage.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Representations showed that there was support for the proposed secondary frontages. Concerns were raised around the proposal not to enforce an A1 threshold on streets of secondary frontage as this had the potential to damage the character of the retail frontage.</td>
<td>• Policy 13 has reintroduced an A1 threshold on streets designated as secondary frontage and is supplemented by retail character statements.</td>
</tr>
<tr>
<td>• The majority of respondents supported the proposed Primary Shopping Area. One respondent questioned the ‘small’ size of the Primary Shopping Area.</td>
<td>• The size of the Primary Shopping Area is sufficient to provide Northampton town centre with a concentrated retail offer, nevertheless there is always potential in planning policy to expand the primary shopping area in the future.</td>
</tr>
<tr>
<td>• One consultee felt it necessary for the Central Area Action Plan to identify the likely new retail frontages and areas where the Primary Shopping Area could expand in the future, following the completion of proposed development.</td>
<td>• Site specific policies 17, 18 and 32 incorporate a mechanism whereby the Primary Shopping Area will be extended following the completion of new development.</td>
</tr>
</tbody>
</table>

*d. Pre-submission draft consultation (November 2010)*
4.5 There were several issues raised during the consultation period. A comprehensive table is given at the end of this part of the technical paper to which these policies relate in Figure 1. The responses can be summarised as follows:

**Inconsistent with PPS4**

4.6 Issues were raised about the inconsistency of this policy against PPS4. This is accepted and the policy has been amended accordingly. This is consistent with the contents of the NPPF.

**Primary Shopping Area**

4.7 Support was given to the defined Primary Shopping Area, which is welcomed. A recommendation was made to accommodate mixed uses in managed shopping centres, whilst supporting high concentrations of A1 uses on primary and secondary shopping frontages. The frontage of the Grosvenor Centre is designated as a primary shopping frontage because of its important retail function.

**Shopfronts**

4.8 Support was given by English Heritage to Policy 13 (Policy 14 at the time) and its reference to improvements to shopfronts. Another consultee recommended that financial services should be allowed to evolve alongside envisaged improvements to shopping provision. The policy response is that Policy 13 is aimed guiding the balance of A1 frontages within the Primary Frontages without precluding other uses, including financial services, from being considered.

**Retail allocation**

4.9 Queries were raised on the suitability of other sites for retail allocations, including Chronicle & Echo and Barrack Road. Both sites are located outside the Primary Shopping Area and outside the town centre boundary, but this does not mean they cannot come forward with a planning application. In addition, there are site specific policies for these sites which provide policy direction on the best uses for the areas.

4.10 Concerns were expressed on the future of the Fish Market, which consultees considered should be a landmark department store. Similar concerns were expressed with regards to the heritage assets along Sheep Street. There was also a query on whether the CAAP is capable of meeting the capacity for convenience retailing as identified in the West Northamptonshire Retail Study, and that St Peter’s Way is a more suitable alternative to Fish Market. The Fish Market site has now been designated for a Bus Interchange facility. The future of the Fish Market building and adjoining premises is to be determined through the progression of the project. At this moment, it is anticipated that the Fish Market, which has no statutory protection, once the appropriate heritage asset assessments have been undertaken will be demolished to make way for the new Bus Interchange. Efforts will be made to ensure that statutorily protected heritage assets will be retained or enhanced, in line with Policy 1 of the CAAP. The St Peter’s Way site, although viable, is located outside the Primary Shopping Area and its allocation could potentially compromise the regeneration of the town centre. This site can be considered for allocation when the CAAP is reviewed.
Query of evidence base

4.11 There were queries on the delivery and the credibility of the CACI study. The delivery element has been addressed in the phasing plan, the fact that up to date retail evidence confirm that the Barrack Road site is not suitable because of its out of centre location.

Provision of convenience floorspace

4.12 Concerns were raised about the provision of convenience floorspace in the Central Area, in terms of its necessity and also deliverability. The policy consideration is that the Central Area is well suited to the town centre in providing part of a wider retail mix and that the convenience floorspace is likely to be delivered towards the latter part of the plan period. Since publication, additional convenience floorspace in the Primary Shopping Area has been accommodated, confirming the deliverability and demand for such us in the Central Area.

4.13 Another issue raised relates to the lack of reference as to whether comparison or convenience floorspace is expected to be provided. The policy response is that the policy is not meant to be too prescriptive, it allows developers the flexibility to determine the layout and use.

Heritage

4.14 For the Drapery, similar concerns were raised with regards to the impacts on the heritage assets. The policy response is that Policy 1 requires that developers should aim to preserve and enhance the character, appearance and setting of the Central Area’s heritage. However, to provide clarity, the policy will be amended accordingly.

4.15 For the Market Square, support was given for the policy, particularly in relation to the public realm.

4.16 In summary, the policy direction of all retail policies remain unchanged with the exception of Policy 11 on impact assessment and Policy 15 relating to Fishmarket, which has now been re-allocated for a bus interchange facility and substituted with Abington Street East.

e. Focused Change consultation Nov 11

4.17 Summary of comments is as follows: 5 responses were received. Responses include a statement that the town centre already has sufficient shopping provision; concerns were also raised on the adverse impact on the historic building (the library) and the loss of an important civic service in the form of a library. A petition objecting to the Grade II listed building being redeveloped to provide additional retail provision was also submitted. Recommendation: Approve the Focused Change to reorder the criteria, with the heritage issues placed first and provide the additional changes in response to representations by adding the words: ‘Retain..’ before ‘Preserve’ in the now reordered first criterion 1 and ‘the opportunity for the continued provision of’ in the criterion related to providing library and clinic services either within the regeneration site or elsewhere within the Central Area.
5. SUSTAINABILITY APPRAISAL

5.1 The Sustainability Appraisal report concluded that:

- Policies 11 and 12 will have no significant negative effects. It will have a significant positive impact on the economy. By clustering town centre uses together, policies 12 and 13 will help to provide accessible employment opportunities and help to foster a culture of enterprise in the town centre. Minor positive impacts are identified in relation to air quality, noise, labour market and economy, soil, geology and land use.

- Policy 13 and 14 will have no significant negative or minor negative impacts. Significant positive impacts are predicted in relation to labour market and economy, landscape/townscape, population and social deprivation. Minor positive impacts are predicted in relation to air quality, noise, archaeology and cultural heritage.

5.2 The report did suggest an enhancement measure. It recommended that Policy 13 should ensure that changes to frontages within the Primary and Secondary Frontages protect the fabric and setting of any listed buildings or other historic buildings. Whilst the Council agrees with this, it considers that this issue is sufficiently covered in Policy 1 (item 7), which seeks the preservation and enhancement of the character, appearance and setting of all Central Area heritage assets.

5.3 In appraising Policy 17, the Sustainability Appraisal report concluded that its implementation will have no significant or minor negative impacts. The policy is predicted to have significant positive impacts in relation to air quality, noise, archaeology, cultural heritage, crime and community safety, health and well-being, employment, landscape/townscape, material assets, population and social deprivation. Minor positive impacts are predicted in relation to biodiversity, energy and climate, short-term employment, soil, geology, land use, waste and water.

5.4 For Policy 18, it identified that there will not have any significant negative impacts. It will have medium term minor negative impacts in relation to archaeology and cultural heritage, health and well-being, townscape and education and training during the construction phase and while waiting for the re-provision of the library and health clinic facilities. It will also have minor negative impacts in relation to the labour market and economy, population and social deprivation. The policy is predicted to have minor positive impacts in relation to air quality and noise, crime and community safety, energy and climate, soil, geology and land use, waste and water. There are likely to be long-term positive impacts for health and well-being and education and training.

5.5 In terms of mitigation it suggested that the Council work with NCC and the health services to inform the public of proposed changes to service provision and the alternative arrangements being made. The CAAP commits the Council to working in Partnership with a range of stakeholders to secure regeneration and to ensure that the development management policies are complied with. The County Council (Library Services) and Health Care commissioning bodies are identified as partners. Any public engagement strategy will form part of the planning application process.

5.6 In terms of potential enhancements it suggested a provision to ensure a frontage and / or access from the Ridings to encourage natural surveillance and increase the number of active frontages in that area. It is considered that this is addressed by Policy 1,
with a decision being made to reflect the character of the Ridings on the extent of active frontage provided. It also suggested exploring the possibility of incorporating a small amount of office or other uses (including replacement of the clinic and the library) to encourage a greater diversity of employment opportunities in addition to the retail already specified. It is considered that in physical capacity terms it might be difficult to introduce other employment in addition to the uses required. No viability testing has been done on the inclusion of other uses to support the idea. Additional uses of this type however are unlikely to be refused unless they undermined delivery of the retail element. The policy stipulates that the Library and Clinic will be replaced within the regeneration site or elsewhere in the Central Area. Therefore there will be no net loss in terms of high quality employment opportunities

5.7 For Policy 32, the appraisal predicted significant positive impacts in relation to archaeology, cultural heritage, landscape/townscape, population and social deprivation. Minor positive impacts are predicted in relation to biodiversity, crime and community safety, energy and climate, health and well being, employment, material assets, soil, geology, land use, waste and water. However, the policy will have an uncertain effect on air quality and noise because no evidence is presented that the measures will be effective in reducing the impact of the significant levels of developments in the Central Area. Coupled with the fact that public funding available for transport improvements reduce over the next few years, this raises a concern that development will increase traffic related problems in Northampton. The study recommended that reference should be made to providing traffic calming measures in the area around the Drapery redevelopment. This recommendation is noted but it is not considered necessary to specify this in the Plan because these are measures which will form part of the consideration to be given in discussion stakeholders when the proposal progresses.

5.8 For Policy 31, the appraisal concluded that significant positive impacts are predicted in relation to crime and community safety, health and well being, employment, landscape / townscape in the medium to long term, material assets, population and social deprivation. Minor positive impacts are predicted in relation to air quality, noise, archaeology, cultural heritage, biodiversity, energy and climate, landscape / townscape in the short term and waste. It was recommended that specific reference be made to preserving the fabric of the listed buildings situated around the Market Square. This recommendation is noted but is not considered necessary include this because this issue is addressed through reference to policy 1.

6. POLICY DELIVERY

6.1 The policies will be delivered through a range of measures:

- Development management of planning applications which will ensure that the requirements of the National Planning Policy Framework (sequential test and impact assessments) are met;
- A development agreement between Legal & General (the owners of the Grosvenor Centre) and Northampton Borough Council was signed in December 2009, and pre-application discussions are occurring which demonstrates an on-going commitment to delivery;
- Assessing planning applications for change of use on designated shopping frontage in against the findings of the Northampton Town Centre Shopping Survey; and
The town centre has a Business Improvement District which was established in October 2010. This will last for 5 years. It will, amongst others, seek to encourage more investors into town and improve trading conditions for businesses.

6.2 For the Grosvenor Centre, it has already been mentioned that a Developer Agreement was signed by Northampton Borough Council and Legal & General in December 2009. This Agreement sets out obligations on both parties that will lead to a redevelopment of the bus station site with a major extension to the Grosvenor Centre. As the redevelopment is an extremely complicated project, an indicative timetable drawn up predicts that demolition of Greyfriars bus station and start of works on building the new extension will start in 2013, with opening of Phase 1 in 2017 and completion of Phase 2 in 2018.

6.3 Partnership working with the private sector and public sectors including Northamptonshire County Council, West Northamptonshire Development Corporation and the NHS Foundation Trust will continue to secure the delivery of these projects.

7. CONCLUSION

7.1 These policies will strengthen the retail offer in the town, and address the imbalance between town centre and out-of-town provisions. They will ensure that developers are clear about how the sequential test and impact assessments are to be applied. They will ensure that the right amount of retail floorspace will be available to meet future population needs.
Figure 1: Summary of consultation responses  
Pre-submission draft Central Area Action Plan (November 2010)

Representations on retail policies

### Policy 11 (formerly 12) Town Centre boundary

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy 11 specifies that the town centre boundary is to be used as the reference point for sequential testing of applications for main town centre uses. This is inconsistent with PPS4</td>
<td>Policy 11 needs correction with the reference to ‘sequential testing’ being replaced with ‘impact assessment’. Subject to this amendment, the policy approach is in accordance with NPPF.</td>
</tr>
</tbody>
</table>

The policy was not considered effective. To be effective, it was recommended that the policy must specify how the total target development figure can be delivered within the Plan period, how the need for retail requirement will be met up to 2016 and whether bulky goods retailing is to be accommodated within the town centre.

The delivery section of the CAAP provides details on how the floorspace is to be delivered within the Plan period. It is clear from the Plan that no large additional floorspace is expected to come forward before 2016. The Grosvenor Centre redevelopment is not expected to complete by then because its progress is reliant in part on the demolition of the Greyfriars Bus Station. The CAAP is not meant to provide allocations for every single type of retailing, but any proposals that come forward which constitute a main town centre use, will be subject to sequential testing and a retail impact assessment. Policy 11 addresses this.

### Policy 12 (formerly 13) Definition of the Primary Shopping Area

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• A query was raised on the lack of objectives or policies on the Nene Valley and St James Park sites, and the opportunity presented by these sites in accommodating large format retail uses.</td>
<td>• Policy 12 identifies the Primary Shopping Area as the preferred location for retailing. Also, the sites are separated from the town centre boundary and there may be better locations for this type of retail format closer to the Primary Shopping Area.</td>
</tr>
<tr>
<td>• Recommended a mix of uses in managed shopping centres, whilst supporting high concentrations of A1 uses on primary and secondary frontages</td>
<td>• The frontages of the Grosvenor Centre is designated as a primary shopping frontage due to their important retail function</td>
</tr>
<tr>
<td>• Support was given to the defined Primary Shopping Area with a recommendation to offer</td>
<td>• The support given is welcomed. It should be noted that John Lewis has indicated that it did not see Northampton as a high priority location.</td>
</tr>
</tbody>
</table>
the former Fishmarket site to John Lewis.

### Policy 13 (formerly 14) Improving retail offer

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Financial services should be allowed to evolve alongside envisaged improvements to shopping provision over plan period. Previous concerns raised at other stages of consultation and through Joint Core Strategy include frontage designations; the need to review Local Plan policies that seek to restrict A2 uses in designated frontages.</td>
<td>• The intention of Policy 13 is to guide what balance of Class A1 frontages are considered appropriate in the within the Primary Frontages. It does not preclude any consideration of an application from a financial services retailer within the Primary Frontage. Indeed, the threshold of A1 Uses has been reduced from 90% to 80% which demonstrates the Council's recognition that alternative Use Classes can make a valuable contribution to the vitality and viability of the centre.</td>
</tr>
<tr>
<td>• English Heritage supported the reference to improving shopfronts in Policy 13. They also suggested the inclusion of Gold Street in the “key retailing streets”.</td>
<td>• The support is welcomed. Also, the Council adopted a Shopfront Design Guide SPD in September 2011. The Council acknowledges that every street is important although there are issues associated with resources and realism in relation to niche retailing and investment.</td>
</tr>
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</table>

### Policy 14 (formerly 15) Meeting retail capacity

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>The policy should be amended to read “…an additional 37,000 sq.m will be provided by the Grosvenor Centre…” and references to CACI study para 6.0.8 should be removed.</td>
<td>• This has been amended accordingly.</td>
</tr>
<tr>
<td>• Query was made on the source from of the retail capacity identified from which the sites at the Drapery and Fishmarket</td>
<td>• Policy 14 was based on up to date retail and feasibility studies undertaken in 2010.</td>
</tr>
<tr>
<td>• Comment provided supporting a substantial increase in high quality retail floorspace irrespective of whether Northampton becomes a city or not</td>
<td>• Policy 14 endorses this.</td>
</tr>
<tr>
<td>• Policies 11 and 14 should recognise that unmet need could be met by individual</td>
<td>• Whilst the Council is content that the Grosvenor Centre will be redeveloped within the timescale set out in Policy</td>
</tr>
<tr>
<td><strong>applications, such as the Chronicle &amp; Echo site, in the event that the anticipated developments fail to be delivered or are delayed</strong></td>
<td><strong>14, it does not preclude the owners of Chronicle &amp; Echo from coming forward with a planning application</strong></td>
</tr>
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</tr>
<tr>
<td>• Policy 14 is ineffective because it cannot provide guidance on where the total retail requirements should be met and how retail need would be accommodated in the short term</td>
<td>• Policy 14 and tables 7.3, 7.4 and G.1 show how and when each development project will be delivered within the plan period</td>
</tr>
<tr>
<td>• CACI West Northamptonshire Retail Study 2008 – 26 does not provide a credible and robust evidence base. Barrack Road offers an appropriate and deliverable location for foodstore</td>
<td>• Policy 14 is based in part of a more up to date retail study undertaken for the Joint Core Strategy by another consultant. Barrack Road is not considered suitable due to its out of centre location</td>
</tr>
<tr>
<td>• The safeguarded development opportunities for new retail floorspace in the town centre would be best accommodated when a new supermarket operated by a new entrant to the centre, rather than extensions to existing stores, so as to improve customer choice and provide greater competition between retailers.</td>
<td>• The 2 sites identified for additional retailing are meant to come forward towards the end of the Plan period, or until the Grosvenor Centre redevelopment is well underway. This policy seeks to address retail capacity resulting from the need identified as part of the growth agenda. Policy 14 does not preclude other sites from being brought forward for additional retailing – these will be assessed against relevant local and national policies.</td>
</tr>
</tbody>
</table>

**Related Other**

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Concern is raised on the impact of leakage from the town centre to emerging out of town retailers including Asda in Franklin’s Gardens.</td>
<td>• The Core Strategy addresses the balance between the town centre and out of centre retail developments.</td>
</tr>
</tbody>
</table>
## Representations on site specific allocations

<table>
<thead>
<tr>
<th>Policy 17: Grosvenor Centre</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Summary of Representation</strong></td>
<td><strong>Policy Response</strong></td>
</tr>
<tr>
<td>• Concern over the loss of public toilets as part of the Grosvenor extension.</td>
<td>• To ensure customer comfort all large scale shopping centre developments contain dedicated toilet facilities, these are often supplemented by the toilets of eating establishments and on occasion department stores.</td>
</tr>
<tr>
<td>• Additional convenience floorspace is unlikely to be delivered until the end of the plan period, doing nothing to meet the immediate need for additional convenience shopping in Northampton. Given Sainsbury’s existing presence in the centre, any proposal will simply deliver an extended Sainsbury’s store. As such, expansion of the Grosvenor Centre will not provide the new store that is needed. Nor will it provide the benefits of competition or contribute to a greater delivery of retail provision.</td>
<td>• The CAAP has not taken a specific approach to identifying exact locations for food retail, as this type of retail is already being delivered in the centre. If part of the larger development schemes identified in CAAP, it is recognised that convenience floorspace is likely to be delivered towards the latter part of the Plan period. It does not necessarily follow that this will be expansion of Sainsbury’s, it might be that this floorspace is taken by a new operator; no decision regarding operators has been taken at this time.</td>
</tr>
<tr>
<td>• Concern over the lack of clarity in the presentation of the Policy 17 as shown in Fig 6.1. The policy could also be strengthened re PPS5.</td>
<td>• Policy 17 needs to be a flexible policy tool in order to facilitate development at the Grosvenor Centre development site. The Council acknowledge the importance of recommending details such as the preferred location for certain uses but feel that this is best dealt with in negotiation with the developer.</td>
</tr>
<tr>
<td>• The design principles Figure should be labelled indicative to ensure that it does not constrain the overall emerging design of the Grosvenor Centre.</td>
<td>• As some of the contents are set out in the policy, not all the contents of the Figure can be considered indicative as such, and might well be ‘fixes’. On this basis it is considered that the title should remain</td>
</tr>
<tr>
<td>• Additional convenience retail floorspace should not be accommodated in the town centre. On this basis, the Grosvenor Centre redevelopment should not provide additional convenience</td>
<td>• Additional convenience retail floor space is considered to be appropriate within the town centre, to provide a retail mix. - There is the potential for this floorspace to be provided in the Grosvenor</td>
</tr>
<tr>
<td><strong>Policy 19: Fishmarket (site no longer allocated for retail – shown for Policy 7: Bus Interchange.)</strong></td>
<td><strong>This has been overcome by events – the site is now identified for the bus interchange.</strong></td>
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</tbody>
</table>
| • Should include reference to where new public toilets (as should the rest of the document) will be located following their removal.  
• Should note possibility of landmark building being a landmark department store | • This has been overcome by events – the site is now identified for the bus interchange. |
| • Policy 19 should not include the replacement of buildings on Sheep Street frontage with new development even if the new frontage is reflective of adjacent older buildings. The existing historic buildings are capable of restoration / refurbishment therefore Policy 19 is contrary to policies in PPS 5 (Planning for the Historic Environment).  
• It is recommended that the paragraph 6.3.2 and the first sentence of Policy 19 should encourage the regeneration of the historic buildings rather than redevelopment through demolition. This approach would reflect national guidance in PPS 5 specifically, paragraph 6.3.2 should refer to: "the regeneration of the area that reflects its location within a Conservation Area or its setting". The first sentence of Policy 19 should be revised as follows: "the former Fish Market and adjoining buildings will be regenerated in a manner consistent with the development principles…" The third of the bullet points, together with a similar statement in paragraph 6.3.2 should be deleted. | • This has been overcome by events – the site is now identified for the bus interchange. |
| • It is assumed that this site has been identified as an appropriate location for new convenience floorspace by the Northampton |
Central Area Sites Feasibility Study (August 2010). The study concluded that a new supermarket in this location would need to comprise two storeys due to limited site size and that parking would need to be provided off-site in the Mayorhold multi-storey car park. This would require the construction of a high level walkway to link the new supermarket to its parking area. Whilst the study concluded that supermarket development on this site could be viable, there are a number of significant factors that further diminish its potential, e.g. the costings make no allowance for the required bridge link to the adjacent multi-storey car park and nor was there any assessment of the current capacity of the Mayorhold car park and its ability to accommodate shared use with a new supermarket. Most significantly, the study itself queries the ability to attract major superstore operators to the site on the basis of the two storey / off-site parking format. In addition, the Mayorhold car park falls within the Grosvenor Centre Redevelopment Site and so there must be a serious possibility of the car park being redeveloped as part of that wider redevelopment leaving the Former Fish Market Site without convenient access to a nearby customer car park. As such, the basis for setting policy to promote this site, as one of only two sites to be promoted for new convenience floorspace, is at best shaky. The CAAP should not seek to safeguard town centre sites that have only limited potential to be used for new convenience floorspace. Rather, it must retain the flexibility to allow realistic development opportunities to be brought forward in appropriate locations. Table 7.3 of the CAAP
indicates that development of the Former Fish Market Site is not expected to start until 2021-2026 which differs from the phasing set out in Figure 7.1 and 7.2 of the AAP. This needs to be clarified. Whichever position is correct, it will do nothing to meet the short-term need for additional convenience shopping in Northampton, identified in the West Northamptonshire Retail study as an additional 3,017 sq.m net by 2016. In addition, the Feasibility Study considered a site at St Peter's Way to have potential for supermarket development. Whilst we do consider this site to be any more suitable than the Former Fish Market Site, there is no apparent rationale or evidence base for the Former Fish Market Site to have been brought forward into the CAAP in favour of the site at St Peter's Way.

- Concerns over the proposed demolition of within buildings adjoining a Conservation Area, this includes Fishmarket. These buildings contribute to the Conservation Area's significance, character and appearance. These buildings also contribute to the setting of Listed Buildings on the opposite side of Sheep Street. There is scope to consider the reuse and upgrading of existing buildings.
- Para 6.3.2 text changes 'the regeneration of the area that reflects its location within a Conservation Area or its setting' First sentence Policy 19.... 'The former Fish Market and adjoining buildings will be regenerated in a manner consistent with the development principles. Bullet point 3 - 'Seek opportunities for the reuse and restoration of historic buildings and their integration into the proposed development' including Fish

- This has been overcome by events – the site is now identified for the bus interchange. These issues have been considered in the site's allocation for this purpose.
<table>
<thead>
<tr>
<th>Market, rather than demolition.</th>
<th>This has been overcome by events – the site is now identified for the bus interchange.</th>
</tr>
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<tbody>
<tr>
<td>• The site is stated to be capable of accommodating 6,000 sq.m of retail floor space together with associated eating and leisure uses. The policy does not state whether the retail floorspace should be comparison or convenience. The site does not appear large enough to provide the stated floorspace requirements, other than through a multi-level development. The site would not be therefore be appropriate to meet the identified need for a Foodstore in the Central Area. It would therefore be appropriate to consider issues of deliverability, viability and demand to be effective in PPS12 terms.</td>
<td></td>
</tr>
<tr>
<td>• This has been overcome by events – the site is now identified for the bus interchange.</td>
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**Policy 32: Drapery**

- Concern over proposals to redevelop the western part of the Drapery through the demolition of existing buildings within a Conservation Area. Little consideration for promoting the 'sense of place'. The proposals appear to be contrary to CAAP Policy 2 and Urban Design objective 5. This policy is contrary to policy within PPS5.

- Para 6.15.2 should read - 'the regeneration of the area that reflects its location within a Conservation Area or its setting'. Policy 33 amendments - First line, insert sensitively regenerated - delete redeveloped. Bullet Point 4 - reference the opportunity to reuse and restore historic buildings when proposing any development. Bullet Point 6 - 'Enhance' Swan Yard and Jeyes Jetty - 'respecting their historic character'.

- Other policies in the CAAP clearly look to "ensure development of the highest standard that reflects the rich architectural heritage and adds to sense of place (Strategic Objective 2) and through Policy 1 "Design Excellence" Bullet Point 7 "Preserve and enhance the character, appearance and setting of the Central Area's heritage assets". These need to be taken into account when considering the proposals in the site specific policies. It is considered that it might be interpreted by some that redevelopment could be regarded as demolishing everything and starting again. Therefore regeneration could be regarded as a suitable replacement for redevelopment. It is considered that a reference to reusing and restoring historic buildings could be made in bullet point 4. The reference to the historic character of Swan Yard and Jeyes Jetty is also considered an appropriate addition.

Amend Policy 33 start to: "The
Draper will be regenerated….”
Amend Policy 33 bullet point 4 to: “Reuse and restore historic buildings wherever possible and enhance …..”
Amend Policy 33 bullet point 6 to: "Enhance Swan Yard and Jeyes Jetty through respecting their historic character whilst seeking to provide attractive and safe links between Draper and College Street.”

<table>
<thead>
<tr>
<th>Policy 31: Market Square</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Policy is strongly supported. Public realm improvements should include cobbles and a centre piece back on the Square</td>
</tr>
<tr>
<td>• Pre-twentieth century frontages should be replicated and restored. The redevelopment of Greyfriars will provide an opportunity to do this on the north side</td>
</tr>
<tr>
<td>• A returned Peacock Hotel could provide fine dining and a boutique hotel on the east side with outdoor seating for spring and summer</td>
</tr>
<tr>
<td>• The return of cobbles and a centre piece in the Market Square are reasonable suggestions but they are detailed design issues which would need to be dealt within a Masterplan for the Market Square, or within the Public Realm Implementation Framework. Responses to consultation however are mixed on the issue of re-introducing cobbles to the square. Older people and those with mobility issues in particular tended to prefer a smooth surface such as that which exists currently. The use of cobbles however is not inhibited by Policy 31, on the contrary, the policy requires that any proposals will complement and improve the quality of the public realm in line with Policy 3 - Public Realm. This requires changes in the public realm to be consistent with the Public Realm Implementation Framework (PRIF). The PRIF considers surface materials and street furniture and it does set out design principles for the Market Square. A review of the PRIF is planned to ensure it is contiguous with the Central Area as defined in the Plan. The review will also update existing principles and where appropriate introduce new principles to reflect recent studies and Masterplans.</td>
</tr>
<tr>
<td>• The suggestion to replicate and restore pre twentieth century frontages is agreeable but the</td>
</tr>
</tbody>
</table>
design of the property frontages is also an issue of detail too specific for CAAP Policy. There are policies within the CAAP to ensure that new development will be consistent with the scale, massing and architectural style of the surrounding buildings (Policy 1 - Promoting Design Excellence) and that the public realm be consistent with the PRIF (Policy 3 - Public Realm). The Market Square policy requires that any proposals, including that of the Grosvenor redevelopment, comply with these design policies.

- There is currently no evidence to suggest that the current uses found in Peacock Place are detrimental or undermining the Central Area enough to demand a change of use. In addition there is no conclusive evidence to suggest that changing the use of Peacock Place to a hotel would be viable development, particularly in the current economic climate. However, the suggestion is not without merit and the Market Square policy does not inhibit this as a proposal for the future should the landowner express an interest.

Pre-submission draft Focused Change consultation (Nov/Dec 2011)

<table>
<thead>
<tr>
<th>Policy 11: Town Centre boundary</th>
<th>The reference point for an impact assessment is the Primary Shopping Area (PSA), not the town centre boundary. The town centre boundary is the reference point for all other town centre uses. A sequential assessment, as well as an impact assessment, must be undertaken for retail use outside of the Primary Shopping Area and the Town Centre Boundary for all other town centre uses. As reference to the sequential test has been removed from Policy 11. Proposals for main town centre uses outside of an existing centre will be subject to a sequential test, as per NPPF.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The reference point for an impact assessment is the town centre boundary, as set out in NPPF. Reference to the sequential assessment has not been removed from Policy 11. Proposals for main town centre uses outside of an existing centre will be subject to a sequential test, as per NPPF.</td>
<td></td>
</tr>
</tbody>
</table>
from Policy 11 it is therefore considered unsound.

Legal and General support the amended policy which directs retailing to the Primary Shopping Area and reduces the threshold for the submission of an impact assessment for town centre use proposals. Changes to the policy now make it consistent with national planning policy.

| From Policy 11 it is therefore considered unsound. | Noted. |
| Legal and General support the amended policy which directs retailing to the Primary Shopping Area and reduces the threshold for the submission of an impact assessment for town centre use proposals. Changes to the policy now make it consistent with national planning policy. | Noted. |

Policy 11 is not explicit in the wording, the policy could be interpreted that the preference for applying the sequential approach is the Primary Shopping Area, then the edge of centre.

| Policy 11 is not explicit in the wording, the policy could be interpreted that the preference for applying the sequential approach is the Primary Shopping Area, then the edge of centre. | The wording in Policy 11 is considered appropriate. |

**Policy 14: Meeting Retail Capacity**

Policy 14 lacks the certainty to deliver the identified need for convenience floorspace that is required to create more sustainable shopping patterns and deliver the CAAP strategic objectives (this is also reflected in that Policy 18 only promotes convenience floorspace). The Royal Mail Barrack Road site is ideally placed to meet this need.

The CAAP evidence base concluded that a foodstore should be actively considered in a town centre location. However, the likelihood of convenience provision, of a scale that meets the identified need, being accommodated on windfall sites within the town centre boundary is very unlikely especially when NBC’s own retail consultant confirmed there are no sequentially preferable sites within the town centre boundary. Policy 14 should state that in the absence of any suitable floorspace coming forward in the town centre the Central Area should be considered.

Minor amendments, the new Tesco on Abington Street is not an ‘extra’

| Policy 14 lacks the certainty to deliver the identified need for convenience floorspace that is required to create more sustainable shopping patterns and deliver the CAAP strategic objectives (this is also reflected in that Policy 18 only promotes convenience floorspace). The Royal Mail Barrack Road site is ideally placed to meet this need. | Planning applications for main town centre uses are first considered against town centre options, edge of centre options and then out of centre, in accordance with the Sequential Approach in NPPF. NPPF does not recognise Plan boundaries, such as the CAAP boundary, to direct new retail floorspace provision. Windfall sites arising within the town centre boundary will continue to provide a focus for meeting the need for convenience floorspace. |
| The CAAP evidence base concluded that a foodstore should be actively considered in a town centre location. However, the likelihood of convenience provision, of a scale that meets the identified need, being accommodated on windfall sites within the town centre boundary is very unlikely especially when NBC’s own retail consultant confirmed there are no sequentially preferable sites within the town centre boundary. Policy 14 should state that in the absence of any suitable floorspace coming forward in the town centre the Central Area should be considered. | All planning applications will be considered on their individual merits and will tested against the guidance in NPPF. In the case, a planning application for a superstore has been submitted and is likely to be considered before the examination of the Central Area Action Plan. |

<p>| Minor amendments, the new Tesco on Abington Street is not an ‘extra’ | Noted and accepted. Minor change required for clarity. |</p>
<table>
<thead>
<tr>
<th>and the floorspace totals in Table total 60,000 sqm, not 61,000 sqm.</th>
<th>The retail floorspace figures in the Plan were established in 2010, since this time the economic climate has worsened and housing growth has slowed. The robustness of the retail floorspace figures in the CAAP can be challenged.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The retail floorspace requirements in the Plan are considered robust and broadly consistent with those in the West Northamptonshire Joint Core Strategy.</td>
<td>A number of alternative retail sites were considered prior to the pre-submission stage. The retail technical paper outlines those sites which were assessed and consequently accepted or rejected.</td>
</tr>
<tr>
<td>Alternatives options for new retail sites, replacing the Fishmarket, have not been considered prior to pre-submission stage.</td>
<td>An additional paragraph as suggested would repeat national planning policy as set out in NPPF.</td>
</tr>
<tr>
<td>The Plan promotes a ‘town centre only’ approach rather than a ‘town centre first’ approach and precludes acceptable retail development outside of the town centre. An additional paragraph should be added stating that new retail development outside of the town centre boundary will be supported provided it meets the test of PPS4.</td>
<td>Noted and accepted.</td>
</tr>
<tr>
<td>Policy 14 should clarify if the proposed floorspace for each of the retail sites is a gross or net figure.</td>
<td>Noted and accepted.</td>
</tr>
<tr>
<td>The updated WN Retail Study identifies 64,600 sqm gross (45,200 sqm net) of comparison floorspace to be delivered between 2010-2021. However, the CAAP identifies 61,000 sqm gross (45,000 sqm net) comparison floorspace and 4,500 sqm convenience floorspace between 2010-2026. Therefore the policy will not be consistent with Policy N2 of the WNJCS.</td>
<td>It is recognised that the timing for the delivery of the floorspace in the CAAP in not consistent with the WNJCS. However, priority is attached to the investment of the Grosvenor Centre proposal as a crucial regenerator of the town centre, meeting the majority of retail capacity within the town centre.</td>
</tr>
<tr>
<td>The Borough Council is reluctant to promote additional sites in advance of the delivery of the Grosvenor Centre. Therefore further retail provision should be considered post 2021.</td>
<td>The Borough Council is reluctant to promote additional sites in advance of the delivery of the Grosvenor Centre. Therefore further retail provision should be considered post 2021.</td>
</tr>
<tr>
<td>Further, representation from Legal and General indicates the concern for other significant retailing opportunities coming forward in the town centre prior to the opening of the Grosvenor Centre.</td>
<td>Further, representation from Legal and General indicates the concern for other significant retailing opportunities coming forward in the town centre prior to the opening of the Grosvenor Centre.</td>
</tr>
</tbody>
</table>
The quantum for convenience floorspace aligns with Policy N2 of the WNJCS. However Policy 14 does not identify a site or sites to account for this capacity. Policy S9 of the pre-submission WNJCS advises a sequential approach to accommodating this retail need, it is not clear from the wording of Policy 11 whether this policy aligns with S9 in this regard.

Planning applications for retail uses are first considered against in primary shopping area options, town centre options, edge of centre options then out of centre, in accordance with Sequential Approach in NPPF. Windfall sites within the primary shopping area and the town centre boundary remain the focus for meeting the need for convenience floorspace.

Policy 14 allows for 65,500 sqm of comparison and convenience floorspace being provided in the town centre up to 2026. However the policy makes provision for the delivery of 60,000 sqm of retail floorspace, and in the longer term. This leaves a shortfall provision of 5,500 sqm, of which 4,500 sqm is convenience.

The Plan in its current form effectively provides a moratorium on development of retail uses outside the town centre and lacks a strategy for meeting need prior to 2016.

The policy states that the majority, not all the 61,000 will be provided on the three identified sites.

All other planning applications for main town centre uses are first considered against town centre options, edge of centre options and then out of centre, in accordance with NPPF. Windfall sites within the town centre boundary remain the focus for meeting the need for convenience floorspace.

The Council also wishes to highlight its flexible approach to dealing with retail planning applications, in the context of CAAP and NPPF, as recent planning permissions have been granted at Tesco Mereway, Abington Street Tesco, Sainsbury’s at Gambrel Road, Netto at Far Cotton and the Certificate of Lawfulness for open A1 consent at Nene Valley Retail Park.

<table>
<thead>
<tr>
<th>Policy 18: Abington Street East</th>
</tr>
</thead>
<tbody>
<tr>
<td>The town centre already has enough shops.</td>
</tr>
<tr>
<td>The East Midlands Regional Plan, the West Northamptonshire Joint Core Strategy and the CAAP evidence base all identify a shortfall in retail floorspace in Northampton town centre. This gap will be further widened should no provision be made to service future population increases up to 2026.</td>
</tr>
<tr>
<td>The majority of retail units within Northampton aren’t of sufficient size / scale to cater for modern retailing.</td>
</tr>
</tbody>
</table>
The regeneration of the Abington Street East site for retail purposes may result in the demolition of historic buildings or unacceptable changes to a Grade II listed building.

The town centre would be losing an important civic service, the library, through the development of this site. PPS4 highlights the need for diversity of uses in town centres. The alternative location for a new library, stated in the plan, would result in the presence of the library in the town centre being downgraded.

The evidence base report identifying the Abington Street site as a viable development option does not recognise the heritage impact of proposals.

In addition, English Heritage disagree with the Sustainability Appraisal of the CAAP which states the negative impacts of Policy 18 will be greatest during the short-term development / redevelopment phase and will diminish in the medium – long term.

It is considered that Policy 18 together with Policy 1: Delivering Design Excellence, provides a clear direction for future investment and ensuring that heritage assets and the character of conservation areas are preserved and enhanced. In addition, as identified by English Heritage, any planning application would be supported by a full heritage impact assessment.

The timetable for the delivery of

It is considered that this would result

The CAAP states that the provision of library services will be maintained either as part of Abington Street East regeneration or provided elsewhere within the Central Area.

This policy represents a long term proposal as the site is not required to meet retail provision until post 2021. The proposal takes account of NCC’s potential decision to relocate a library somewhere else in the town centre. NBC will not force NCC to move the library if NCC decide that they do not want the library to be moved elsewhere in the central area.

The impact of the policy will be greatest during the construction / redevelopment period. Any proposal will be assessed against Policy 1 (Delivering Design Excellence) and Policy 18, the Council believe the design criteria in these policies is sufficient to ensure the character of this heritage asset is preserved over the medium – long term.
<table>
<thead>
<tr>
<th>Policy 18 should be included in the policy for completeness.</th>
<th>in unnecessary repetition and be inconsistent with the presentation / content of other site specific policies in the Plan.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Petition in strong objection to the Grade II listed building (Northampton’s central library of Abington Street) being converted and developed into a shopping precinct. 175 signatures and comments raising the following issues:</td>
<td>The East Midlands Regional Plan, the West Northamptonshire Joint Core Strategy and the CAAP evidence base all identify a shortfall in retail floorspace in Northampton town centre. The majority of retail units within Northampton aren’t of sufficient size / scale to cater for modern retailing.</td>
</tr>
</tbody>
</table>
| • The town centre doesn’t need anymore shops.  
• Loss of a popular community / civic service  
• Damage to the town’s heritage | This policy represents a long term proposal as the site is not required to meet retail provision until post 2021. In any event, the provision of library services is not a planning policy consideration for the Council. The provision of library services in the Central Area is service provision matter that lies within the responsibilities of Northamptonshire County Council. |
| The library building should be retained as a library. In addition, the frontage of the library building should be retained. | The provision of a library in the Central Area has been retained. Maintaining the frontage of the library building will be considered at the planning application in the context of CAAP policy and national policy/legislation, particularly as the library is a Grade II listed building. |
CENTRAL AREA ACTION PLAN TECHNICAL PAPER:  
OFFICE AND BUSINESS

POLICY 15: OFFICE AND BUSINESS USES  
POLICY 23: UPPER MOUNTS / GREAT RUSSELL STREET  
POLICY 33: FREE SCHOOL STREET  
POLICY 34: FORMER ROYAL MAIL SORTING OFFICE  
POLICY 35: TELEPHONE EXCHANGE, SPRING GARDENS

1. INTRODUCTION

Context

1.1 Northampton Borough does not currently suffer from high unemployment. However, it does have a higher than average proportion of lower paid workers. In addition, there is a significant difference between the overall level of employment provision in the town centre compared with the rest of the borough.

1.2 This paper deals with the formulation of Policy 15, which ensures that demand can be created in the Central Area whilst safeguarding existing employment sites. Policies 23, 33, 34 and 35 are also discussed here because these are existing employment sites which are being allocated for mixed use incorporating office uses. This paper makes reference to larger office sites like Waterside and the regeneration areas of St John’s, Angel Street and Bridge Street, but it should be noted that these sites are discussed in a separate technical paper.

Office and Business Policy Aims

1.3 There are 2 key issues associated with office provision in the Central Area.

Competition from out-of-centre office developments

1.4 The first issue relates to competition from out-of-centre office developments. Over the last 5 to 10 years, employment land allocations from the existing adopted Local Plan were consistently taken up, leading to an increasing supply of built employment floorspace, predominantly within the strategic distribution sector. The Council’s annual employment monitoring surveys show that employment land supply is reducing as more planning approvals are implemented.

1.5 The West Northamptonshire Employment Land Study (WNELS, Roger Tym & Partners, 2010) states almost 80% of West Northamptonshire’s office floorspace and more than 50% of the industrial and warehousing floorspace are provided within Northampton Borough. This equates to about 456,000 sq.m and 2.5 million sq.m respectively. A large proportion of Northampton’s stock is located on new estates such as Swan Valley, Pineham and Bedford Road (north of Brackmills Employment Area) and not in the Central Area.

1.6 Also, there has been an increase in employment developments within the B Use Classes Order categories on greenfield sites (like Bedford Road, east of the Barnes Meadow Interchange) and sites adjoining the M1 motorway (including Swan Valley and Pineham). The immediate availability of accessible greenfield sites, and their allocation
for employment use in the adopted Northampton Local Plan, led to significant employment developments in out-of-town locations.

1.7 The availability of greenfield sites and more modern premises resulted in a substantial number of office occupiers who have relocated to strategic employment areas out-of-town (including, for example, Barclaycard who relocated to Brackmills). Some of the sites occupied by Barclaycard have been redeveloped – now called Sol Central - to accommodate leisure uses including a hotel, some restaurants and a cinema, others like the office space adjacent to Sol Central and above the bus station remain empty.

1.8 A policy that can reverse this out of centre trend and assist in meeting the objectives of the CAAP is therefore required. This can be achieved through the wider aim of regenerating the town centre, by promoting additional office and business allocations in the Central Area.

**Poor quality stock in the Central Area**

1.9 The second issue relates to poor quality stock, which is not suited to modern day requirements. Whilst quality new built premises of varying sizes and degrees of flexibility are accommodated outside the town centre, the Central Area is left with older stock, which is expensive to renovate or redevelop.

1.10 The Central Area currently offers secondary office spaces. Both WNELS and the Strategic Employment Land Assessment (SELA) confirmed that there is very little space available in the Central Area, and very little in modern large floorplate units. The only exception is the development of the Avon Headquarters at Nunn Mills Road. However, this replaces an existing office building so there is no significant net increase in office floorspace and jobs.

1.11 The Central Area is left with older and more obsolete accommodation where the continuous pressure for conversion to alternative uses, predominantly residential, exists. This older stock is generally unsuitable for modern day office requirements. For instance, Northampton House, formerly used for County Council offices, was converted to residential use. Pressure for conversion to alternative uses has also contributed to the imbalance in office provision within the Borough.

1.12 A policy is required to encourage developers to build in the town centre by allocating sites, and also by safeguarding existing employment to cater for future office demand. With complementary growth in both retail and offices within the Central Area, its regeneration will secure the continual growth and prosperity of Northampton’s town centre.

**Job Creation**

1.13 National policy requires Local Planning Authorities to plan for jobs and not just those within the B categories. However, in developing a policy which will tackle the issues identified, it is considered that the Central Area needs to provide for more office jobs and that other types of jobs will be created through site specific redevelopment proposals and windfall developments both within and outside the Central Area. Also, the designation of an Enterprise Zone in Northampton (July 2011) provides for the delivery of other employment uses including industrial and business support. The designated Enterprise Zone includes land within the Central Area.
1.14 The West Northamptonshire Joint Core Strategy (pre-submission draft, February 2011) identifies the Central Area as a location where major office, leisure and cultural development will take place. In developing Policy 15, it is apparent that the policy has a key role to play in providing quality employment opportunities to generate demand in the town centre whilst also soaking up future demand, resulting from the housing growth. Policies 23, 33, 34 and 35 also have a role to play in providing additional jobs, both within and outside the B use categories.

2. PLANNING POLICY CONTEXT

National Planning Policy

2.1 The National Planning Policy Framework (March 2012) includes requirements to:

- set out a clear economic vision and strategy for their area which positively and positively encourages sustainable economic growth
- identify strategic sites for local and inward investment to match the strategy and meet anticipated needs over the plan period
- support existing business sectors
- prepare flexible policies to accommodate needs not anticipated in the plan and allow a rapid response to changes in economic circumstances

2.2 NPPF also states that planning policies should avoid the long term protection of sites allocated form employment use where there is no reasonable prospect of a site being used for that purpose.

Regional Policy

2.3 The Regional Plan for the East Midlands (RSS8) requires an increase of 37,200 additional job opportunities for West Northamptonshire, which includes the local authority areas of Northampton, South Northamptonshire and Daventry, up to 2026.

2.4 RSS8 also requires the CAAP to make the Central Area the focus of a range of employment opportunities with a particular emphasis on offices. It identified that this will be through the provision of large office space through to small office suites in both new and converted accommodation. It also seeks the provision of an adequate choice of high quality employment sites for targeted office and high value knowledge based industries. A realistic assessment of the prospects for continuing use of older sites and including an appropriate degree of mixed use on suitable sites, both new and existing, also needs to be achieved.

2.5 A combination of Policy 15, associated site specific policies, and the Enterprise Zone will contribute towards achieving the delivery of the regional plan employment target.

Strategic Policy

2.6 The West Northamptonshire Pre-Submission draft Joint Core Strategy acknowledged that office development in the Central Area has been suppressed due to a lack of available, flexible and modern office space to suit the larger office market. Policy N2 states that major office, leisure and cultural development will take place in the Northampton Central Area. It requires office development in the region of 100,000 sq.m to
be provided, which is reflected by Policy 15 in the CAAP. Para 12.19 states that the provision of office space within the Central Area will bring more employment into the town centre boosting the lunchtime and evening economy.

2.7 Its Vision confirms that Northampton will be repositioned as the key economic driver at the cultural heart of Northamptonshire. Amongst others, it will fulfil its role as the leading centre for retail, entertainment and employment provision. Policy 15 builds on this requirement; it identifies a supply of sites which can accommodate a range of uses for offices, as well as retail, leisure and entertainment. By doing so, it supports the Council’s aim towards creating demand for office spaces in the Central Area. Policies 23, 33, 34 and 35 allocate the development of specific sites for offices and / or mixed use. Other existing employment sites have also been safeguarded to ensure that there is a supply of land, which could be used for office development in the event that new office sites cannot be delivered.

Corporate Plan 2012 - 2015

2.8 The employment and related strategic policies will contribute to the following priorities and outcomes:

- Priority 1: Northampton on track – an economically prosperous, successful and vibrant Town; a Town that is nationally recognised as an economic hub and a place to do business; increased job opportunities and an improvement in the quality of jobs available
- Priority 4: Making every £ go further – a modern diverse workforce
- Priority 7: Promoting health and well being – improved public health

3. KEY EVIDENCE BASE AND POLICY FORMULATION

3.1 The formulation and development of Policies 15, 23, 33, 34, 35 have been informed by the following technical evidence base.

West Northamptonshire Employment Land Study (WNELS, Roger Tym & Partners, July 2010)

Introduction and key findings

3.2 WNELS has been used to determine policy direction for employment and site specific allocations. This study pools together all the existing evidence base prepared to date and updates the market position in terms of supply and demand. Other studies include the Northamptonshire Strategic Employment Land Assessment (Lambert Smith Hampton, Atkins and Nortolf, 2009) and the Strategic Northamptonshire Economic Action Plan (SQW December 2010).

3.3 WNELS forms the baseline on which Policy 15 is shaped. It is up-to-date, was produced to be PPS4 compliant and it provides detailed assessments of all existing employment sites within both the Central Area and throughout West Northamptonshire. The key requirements of PPS4 have been embedded in the NPPF, consequently the Policy is considered to be compliant with existing national planning policy.
3.4 Key findings and recommendations emerging from this study are that:

- Northampton’s town centre should be the catalyst for office employment growth in West Northamptonshire. It is the most sustainable and sequentially preferable location to accommodate high density, high trip generating employment development. Policy 16 allocates key sites such as Waterside, Castle Station, St John’s and Freeschool Street for office use.

- Northampton Borough has only succeeded in delivering less than 20,000 sq.m of net additional office space since 2001, although it has delivered office sector jobs. The town centre especially has a limited track record of delivering large scale office development. This is primarily because there has been very little demand for town centre sites, resulting in limited pressure to deliver complicated town centre redevelopment schemes. The Central Area Action Plan therefore has a role to play in creating and stimulating demand for employment opportunities in the Central Area. Policy 11 addresses sequential testing, which require all town centre uses of 1,000 sq.m gross or more to undertake an impact assessment.

- There is a supply of sequentially preferable town centre sites. However, almost all the sites are dependent on public intervention. Therefore, there is a legitimate argument for sites to be actively promoted. Identifying a supply of sites, through the Central Area Action Plan, can encourage demand. However, public support is required to make the policy work, and this approach is being actively pursued by Northampton Borough Council, Northamptonshire County Council and West Northamptonshire Development Corporation. In addition, the consultants note that other interventions are underway to help change the image and market perception of Northampton town centre as an office location. Key establishments such as Northamptonshire Enterprise Partnership are important in this form of intervention.

- The consultants do not consider that the Central Area should continue to provide for general industrial and warehousing uses. If Northampton is to grow, it is likely that the core centre will need to expand and that traditional employment uses should not become a constraint to this growth. The CAAP does not therefore allocate sites for new general industrial and warehousing use.

- The majority of the existing employment sites in the Central Area have been recommended for safeguarding for future employment use within Policy 15. This will provide an opportunity to secure a steady supply of potential office redevelopment opportunities.

Sites recommended for allocation

3.5 The consultants recommended that an improved quality office offer would be achieved primarily through office (and where appropriate, mixed use) development allocation within the following locations:

- Avon Nunn Mills (approximately 16,000 sq.m)
- Freeschool Street (approximately 2,500 sq.m)
- Midsummer Employment Area (approximately 12,000 sq.m)
- St John’s/Angel Street/Bridge Street (approximately 37,000 sq.m)
- Waterside (approximately 43,000 sq.m)
• Grosvenor Centre (approximately 5,000 sq.m)
• Castle Station (approximately 26,000 sq.m)

3.6 Other sites assessed show that they have potential to be promoted for office development, either as a development site or as part of a wider regeneration/redevelopment opportunity. The retention of existing employment use was also promoted, and in some cases, recommendations were given for intensification of the use. These assessments include sites at Newland car park, existing employment sites in Grafton Street and the northern edge of the ring road as well as Spring Boroughs.

Sites not designated for development

3.7 The Council agreed with the recommended designations, with the exception of a couple of sites where there are issues associated with timing and delivery.

3.8 The Bedford Road site (known as Midsummer Employment Area – to distinguish the area from the larger Bedford Road employment site north of Brackmills) is currently available for infill development and has the potential to be developed within the 5 year timescale. However, the Council does not consider the site to be available and deliverable within the plan period. This is because premises like Riverside House (occupied by Northamptonshire County Council) are unlikely to be available in this time span due to their occupation by a variety of existing businesses and the economic climate. This site has been excluded from the list of new office locations listed in Policy 15. This does not mean that developments on the site cannot come forward. Should they come forward, they will be considered on their merits and whether they accord with the relevant policies in the Central Area Action Plan.

3.9 For the Grosvenor Centre, it is unlikely that the scheme could be considered until the retail and leisure elements are well underway. This is unlikely to happen before 2016. During the public consultation undertaken as part of the Emerging Core Strategy (August 2009), the representatives for Legal & General stated that they were unable to support an office scheme as a viable option.

Formulating a 5 year phasing plan

3.10 Policy 11 (Town Centre Boundary) follows these national guidelines by promoting Northampton Town Centre (as defined on the Proposals Map) as the preferred location for all new retail, office, cultural and leisure developments. A five year land supply of office sites has also been identified. In formulating the 5 year plan, the following key considerations were taken into account:

<table>
<thead>
<tr>
<th>Key considerations</th>
<th>Sites</th>
<th>Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sequential test</td>
<td>St John’s / Angel Street</td>
<td>2011 – 2016</td>
</tr>
<tr>
<td>Delivery mechanism in place eg Collaborative Agreement / Masterplan</td>
<td>St John’s / Avon Nunn Mills / Freeschool Street</td>
<td>2011 - 2016</td>
</tr>
<tr>
<td>Delivery mechanism in place eg Collaborative Agreement / Masterplan</td>
<td>Castle Station</td>
<td>2016 - 2026</td>
</tr>
<tr>
<td>Delivery mechanism in place eg Collaborative Agreement / Masterplan</td>
<td>Bridge Street</td>
<td>2016 - 2026</td>
</tr>
</tbody>
</table>
- Developers are expected to undertake a sequential sites test for developments of town centre uses. This principle has been applied in assessing which sites could come forward in the first 5 years of the plan period. Some of the sites, like St John’s and Angel Street, are located within the town centre boundary (as defined in the Proposals Map) and should therefore, on a sequential basis, be included in the first 5 year phase.

- A planning framework and/or a delivery mechanism is already in place for some of the sites. The Council are in advanced discussions with a commercial developer to develop a hotel on the St John’s site, and a planning application from the University of Northampton to provide student accommodation on the St John’s site has been approved. A Strategic Development Framework has also been prepared for the whole of the Avon Nunn Mills site and WNDC are going through the process of undertaking a compulsory purchase order to allow the site to be brought to market and become available and deliverable for development.

**Estimated Jobs Count**

3.11 Using the density promoted in WNELS, the following expected quantum of new office floorspace for the Central Area was calculated:

<table>
<thead>
<tr>
<th>Site</th>
<th>Floorspace (sq.m) gross</th>
<th>Total</th>
<th>Estimated jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>St John’s and Angel Street</td>
<td>37,000</td>
<td>2,056</td>
<td></td>
</tr>
<tr>
<td>Avon Nunn Mills</td>
<td>Minimum 16,000</td>
<td>889</td>
<td></td>
</tr>
<tr>
<td>Freeschool Street</td>
<td>Minimum 2,500</td>
<td>139</td>
<td></td>
</tr>
<tr>
<td>Waterside St Peter’s</td>
<td>Up to 43,000</td>
<td>2,389</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>98,500</td>
<td>5,473</td>
</tr>
<tr>
<td><strong>2016 – 2026</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Castle Station</td>
<td>Up to 26,000</td>
<td>1,444</td>
<td></td>
</tr>
<tr>
<td>Bridge Street</td>
<td>Up to 8,000</td>
<td>444</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>34,000</td>
<td>1,889</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>132,500</strong></td>
<td><strong>7,500</strong></td>
</tr>
</tbody>
</table>

3.12 The above summary demonstrates that the supply of employment floorspace and the potential number of jobs created could be split into two 5 year phases. However, it is anticipated that not all floorspace within Phase 1 will be completed by 2016, rather, the phasing plan reflects the timing for each development site to at least begin the development process.
3.13 The above table excludes the high number of jobs expected to be created through additional retailing, restaurants, other leisure, sports and cultural facilities. These have not been added because there are no standard densities for calculating jobs within these sectors. The relevant allocations which will see the creation of non B sector jobs are:

- Fishmarket Bus Interchange (Policy 7)
- Grosvenor Centre (Policy 17)
- Abington Street East (Policy 18)
- St John’s (Policy 20)
- Angel Street (Policy 21)
- Bridge Street (Policy 22)
- Upper Mounts / Great Russell Street (Policy 23)
- Waterside (Policies 25 - 30)
- Market Square (Policy 31)
- Drapery (Policy 32)
- Freeschool Street (Policy 33)
- Former Royal Mail Sorting Office (Policy 34)
- Telephone Exchange Spring Gardens (Policy 35)

3.14 Whilst the above estimated floorspace include sites which are expected to create the demand for office space, it does not preclude any other sites from coming forward within the town centre, with uses which conform to the requirements of national policies.

**Safeguarding existing employment sites**

3.15 WNELS also recommended that the Council continue to safeguard sites for employment uses, encouraging their redevelopment and renewal. These relate to sites which were allocated in the adopted Northampton Local Plan. The pre-submission draft West Northamptonshire Joint Core Strategy also requires existing and allocated employment sites to be safeguarded (Policy E1).

3.16 These sites, which include those within the Central Area, were recommended for safeguarding to ensure that there is a continued supply of land for office use over the plan period, in the event that the new development sites do not come forward as anticipated. As set out in paragraph 22 of the NPPF, national policy should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. As stated the suitability of sites has been assessed through WNELS, so it is considered that the Plan does not unreasonably identify such sites. Nevertheless, Policy 15 has been formulated in a manner which allows flexibility through allowing alternative uses on safeguarded sites where it can be shown to have no adverse effect on the quality and integrity of the area as a location for economic employment generating use.

**Sustainable Northamptonshire Economic Action Plan (SNEAP) (Northamptonshire Enterprise Limited (now Northamptonshire Enterprise Partnership, December 2010)**

3.17 The report acknowledges that attractive, well designed town centres, with a range of shops and amenities including art, cultural and historical offers and entertainment, are engines for economic growth and provide a focal point for business and social interaction. Northampton town centre’s challenge is to continue to grow in stature as an important regional centre.
3.18 Various key action points were given including:

- the identification and prioritisation of employment sites
- maximising public sector employment within the town centres and capitalise on the potential increase in footfall in these areas
- developing St John/Angel Street for key office space
- promoting the availability of land for key industry sectors for example consultancy and headquarters

3.19 The CAAP policies referred to in this technical paper contribute to the delivery of the SNEAP.

**Northamptonshire Strategic Employment Land Assessment (Lambert Smith Hampton, Atkins and Nortolf, 2009)**

3.20 This study was commissioned by Northamptonshire Enterprise Partnership. The appointed consultants were required, amongst others to:

- Assess the Northamptonshire commercial property market
- Evaluate the range of employment forecasts for the area and the underlying assumptions, in line with planning policy
- Evaluate current employment land allocations in relation to commercial market demands and strategic priorities
- Identify measures required to ensure that an appropriate range of employment sites are made available to meet employment forecasts requirements

3.21 There were differences in the findings of this study, compared to the West Northamptonshire Employment Land Study (WNELS), on a variety of issues including the future of office land supply. The Strategic Employment Land Assessment (SELA) concluded that there was a significant net shortfall of existing unconstrained supply capacity for offices. WNELS’s outcome was the reverse – that there was a sufficient supply across the plan period – although this included constrained sites.

3.22 However, some of SELA’s conclusions do mirror those contained in the West Northamptonshire Employment Land Study, including the need to identify Northampton town centre as a regionally important location with good rail connectivity and likely to attract inward investment.

3.23 The study has some key recommendations and conclusions including:

- directing town centre office development towards Central Northampton because this is considered to be one of the most sustainable options
- There continues to be a shortage of good quality office floorspace of 500 sq.m to 1,000 sq.m within the town centre
- Northampton town centre is a location which should be examined as a regionally important location with good rail connectivity and likely to attract inward investment
- The redevelopment and revitalisation of Northampton town centre is a strategic priority. A list of sites were promoted, in particular, Waterside, Avon, Castle Station, Waterside West and sites such as St John’s, Angel Street, Bridge Street, Lady’s Lane, Newland and Victoria Street. The phasing of these sites will need to be carefully planned to ensure a balance of supply and demand in the town centre.
The Strategic Employment Land Assessment (SELA) acknowledges that collectively, they have the potential to contribute significantly to the revitalisation of Northampton Central Area. The West Northamptonshire Employment Land Study (WNELS) agrees with some of these recommendations although it recommends that some of the sites be promoted for high value uses to enable key development opportunities to progress

- Local partners continue to work closely together in bringing forward town centre sites which can accommodate a range of B and non B uses

**Site Specific Allocations (Policies 23, 33, 34, 35)**

3.24 The recommendations provided by the above technical studies were reflected in the drafting of Policy 15 and policies associated with site specific allocations. There are sites in the Central Area which have been allocated for office use, either on its own or as part of a wider mixed use.

3.25 The background information relating to Policies 25 – 30 on Waterside are dealt with separately in policy specific parts of the technical papers. These sites cover a wide area to the south of the Central Area which has wider implications on the River and green infrastructure, in addition to residential and commercial provision. Policies 20 (St John’s), Policy 21 (Angel Street) and Policy 22 (Bridge Street) are also subject to fuller assessment in the technical paper. These three areas have been the subject of Masterplanning and their redevelopment / regeneration are being considered comprehensively.

4. PUBLIC CONSULTATION

4.1 The Council embarked on a series of public consultation exercises, which relate to the milestones of the plan preparation process. Each stage of the consultation process provided an opportunity to engage with consultees both in terms of the plan itself and to assist in policy formulation. Below are the key outcomes from the various stages of the consultation process leading up to Submission.

**Issues and Options (September – November 2007)**

4.2 As outlined in the Consultation Report (August 2008) the preparation of the Central Area Action Plan involved a series of public consultation exercises, which have been used to progress, shape and formulate policies.

4.3 Feedback from the Issues and Options consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Comments</th>
<th>Planning Policy response</th>
</tr>
</thead>
<tbody>
<tr>
<td>The most popular locations, although not significantly, for large scale office development, were Bedford Road (now known as Midsummer Employment Area) and the Old Postal Sorting Office on Barrack Road. However, although Midsummer is considered to be acceptable in the West Northamptonshire Employment</td>
<td>The reasons are that the property is unlikely to be required for industrial or warehousing uses and it will be far too removed from the defined town centre boundary, to make it viable for town centre uses. In addition, there is evidence that the site has been marketed for office use but there were no commercial interest in this use.</td>
</tr>
</tbody>
</table>

Northampton Central Area Action Plan Submission Version May 2012
Land Study, the consultants do not consider the Old Postal Sorting Office as being suitable for retention as B employment sites. However, in the Central Area Action Plan, the Council has opted to keep employment use as an option within Policy 34 because the Plan needs to focus on keeping main town centre uses in the Central Area.

The most popular locations for small scale office developments were Freeschool Street, St John’s and Horsemarket (now known as St Katherine’s). The first two sites were considered suitable for office developments. These have been translated into Policies 22 and 33. Feasibility studies carried out for Central Area sites, including St Katherine’s, show that it is more suited to retail use because of its location and viability.

There were representations made that office development forms an important element of the overall function within the Central Area. The type and scale of office development needs to be of a scale commensurate to the overall level of residential accommodation of the town, as set out in the Regional Spatial Strategy (RSS). Although Government has signalled its intention to revoke the RSS, there is still a case to create more jobs in the Central Area to support the overall growth expected in Northampton.

There was support for good quality office in the Central Area, especially big floorplates and multi-storey. It was acknowledged that the Central Area has suffered since companies such as Barclaycard has moved to the outskirts because it took thousands of people away from the centre. High profile developments would attract companies to the town. Policy 15 will deliver this.

Support was also given to architecturally striking and sustainable office schemes particularly those located close to public transport interchanges, for instance, Castle Station. High rise developments should also be considered. Although Policy 15 does not state which buildings will be high rise, it outlines the floorspaces expected for each scheme and Policies 1 and 2 on Promoting Design Excellence and Tall Buildings respectively will address this comment.

There were concerns about the amount of empty units which are already in existence and the prospect. The main reason why units have remained empty is because these are no longer suited to modern day

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of adding to the vacancy rate. Some were promoting offices out of town, leaving the Central Area for retail and entertainment related uses. Others were unsupportive of any additional office space being created in the Central Area whilst there were still empty units available.

occupier requirements. These empty units do not justify leaving the Central Area without additional modern offices provisions. If these units are not what commercial occupiers are looking for, and there is nothing in the pipeline to cater for their requirements, they will look elsewhere. This is not a sustainable option for the Central Area, which needs to be more competitive.

The Central Area Action Plan therefore needs to make sure that there is provision for commercial enterprises within the Central Area, through the delivery of sites and accommodation which are modern, of the right size and are flexible in terms of meeting changes in occupier requirements. Also, creating more employment provision in town, particularly in the form of quality office jobs, would bring investment back particularly during the lunch time and evening economies.

Emerging Strategy Consultation (August/September 2009)

i. Statutory consultees

4.4 Both West Northamptonshire Development Corporation and English Heritage made representations with regards to proposals for offices. Their key comments were:

- West Northamptonshire Development Corporation supported the locations for new office provision
- English Heritage stated that it is important for office developments not to have an adverse effect on the attractive characteristics of the town

4.5 The Council welcomes the support for new office provision in the Central Area. With regards to the attractive characteristics of the town, Policy 1 of the Central Area Action Plan, which is based on evidence obtained through a characterisation study, will ensure that office developments will not have an adverse effect.

ii. Others

- Almost 80% supported the locations for creating workplaces to encourage new businesses into the heart of the Northampton
Some general industrial sites are still operational and provide jobs for the local community and contribute to the local economy. Existing, active industrial sites should be preserved.

Quality, well paid employment opportunities will generate the spending power required to attract quality retailing.

4.6 These comments demonstrate the high level of support for new office provision in the Central Area and the recognition that this will have a positive impact on the regeneration of the town. The Central Area Action Plan has designated office sites as part of this drive towards creating demand (Policy 15). There is also an acknowledgement that some existing units contribute to the local economy, which is why the Action Plan seeks to safeguard the sites through Policy 15. However, it should be noted that should these sites become surplus to requirements, there is an opportunity to increase office space as part of an overall mixed use approach to redevelopment.

**Pre-submission draft (November/December 2010)**

More detailed representations can be found in Figure 2 at the end of this section of the technical paper.

**Policy 15**

**Viability**

4.7 With regards to Policy 15, National Grid made a representation to the proposed office development at the Waterside St Peter's Way relating to remediation costs, office development being unviable and the fact that higher value residential / retail should be included as alternatives.

4.8 The Council’s response to this, as agreed at Cabinet on the 16th March 2011, is to reiterate its commitment to establishing a viable and realistic development solution for this area, to promote the soundness of the CAAP and achieve both employment and housing growth in the Central Area. The site was identified for office use on the basis of evidence confirming its feasibility.

4.9 Council resolved to undertake further discussions with National Grid and other stakeholders to establish the scale and timing of the required remediation. These discussions have continued, primarily with WNDC as the lead, and it is recognised that remediation costs should form a key part of a viability assessment. In the interim, it is considered that there is no need to make changes to the Policy.

4.10 Legal & General requested that the impact of employment uses on the viability of schemes should be considered since it is not always possible to replace in full the displaced floorspace. The Council considers Policy 15 to be sufficiently flexible to allow for loss of employment floorspace where justified.

**Utilities**

4.11 Anglia Water commented that in supplying the developments, some re-zoning will be required and the contents of the most current Water Cycle Study to be taken into account, which has been noted.
Support

4.12 CEMEX offered support for the policy, which has been noted.

4.13 Based on the above contributions, it was agreed that no changes be made to Policy 15 as there exists a robust evidence base to support it. Any new evidence, particularly in relation to viability issues for National Grid, provided between Submission and Examination will be considered accordingly.

Other (Policies 23, 33. 35)

Mixed use

4.14 For Policy 23, responses centred around the mixed use nature of the policy – with recommendations that other alternative uses like small scale B2, cultural related uses like museums and community uses be considered for inclusion in the policy. The policy already contained a wide range of proposed uses. The Council nevertheless considered the potential for additional uses and has amended the policy so that it is not pre-dominantly orientated towards a residential development and will also potentially provide for small scale retailing.

Traffic

4.15 For Policy 33, concerns were raised on the impact of additional traffic. The traffic issue will be addressed through junction improvements.

Scheduled Monuments

4.16 Concerns were raised on the issue of the preservation of the integrity of the Scheduled Monuments. Wording changes have been agreed and these will be incorporated in the Submission CAAP.

Viability

4.17 For policy 34, concern was expressed about the viability of the allocation. It was recommended that the site be allocated for retail, which the Council disagrees with as it is not in conformity to national policy.

4.18 For policy 35, support was given to the allocation. However, one respondent expressed concern about the impact on the skyline. The policy contains requirements which address this issue.

5. SUSTAINABILITY APPRAISAL

5.1 In appraising Policy 15, the Sustainability Appraisal report (October 2010) concluded that it has no significant negative impacts. A significant positive impact is predicted in relation to material assets and labour market and economy. Minor positive impacts are predicted in archaeology, cultural heritage, crime and community safety, energy and climate, soil, geology, land use, education and training. A minor negative impact is predicted in relation to air quality and noise as new office space is proposed in the vicinity of the Victoria Promenade Air Quality Management Area. The report recommended the following mitigation measures be in place:
- Include measures to limit vehicle numbers in the Angel Street / St John’s area eg through including a cross reference to Policies 6, 7, 9 and 10. This has been amended accordingly. Also, since the publication of the pre-submission CAAP, a design guide for the development of St John’s has been prepared to assist developers in progressing their proposals. This design guide includes recommendations to minimise traffic flow within the St John’s area which should mitigate the concerns expressed.

- Policy 15 should ensure that the heritage value of the existing built environment and streetscape is not lost through new development. Policy 1 address all aspects of design and heritage.

5.2 Policy 23 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. The policy is predicted to have significant positive impacts in relation to social deprivation, archaeology, cultural heritage, employment, health and well-being, landscape/townscape, material assets and population. Minor positive impacts are predicted in relation to biodiversity, crime and community safety, energy and climate, soil geology, land use, waste and water. In terms of mitigation, it is recommended that the policy should include provision for enhancing the air quality and noise. It is considered that the issue around Air Quality will be sufficiently addressed in policy terms in the JCS’s policy BN9 – Planning for Pollution Control.

5.3 Policy 33 will have no significant negative or minor negative impacts. Significant positive impacts are predicted in relation to archaeology, cultural heritage, health and well-being, employment, landscape/townscape, material assets, population and social deprivation. Minor positive impacts are predicted in relation to biodiversity, crime and community safety, energy and climate, soil geology, land use, waste and water.

5.4 The policy will have an uncertain effect on air quality and noise because no evidence is presented (through traffic modelling for example) that the measures 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. Further clarity with regards to the impact of transport in terms of impacts on noise and pollution has been provided in association with the Submission Sustainability Appraisal.

5.5 Policy 34 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. Significant positive impacts are predicted in relation to archaeology, cultural heritage, biodiversity, health and well-being, landscape/townscape, material assets, population and social deprivation. Minor positive impacts are predicted in relation to crime and community safety, energy and climate, employment, soil, geology, land use, waste and water. They also recommended the inclusion of a reference in the policy to limiting the impact of traffic within the Barrack
5.6 Policy 35 will have no significant negative or minor negative impacts. Significant positive impacts are predicted in relation to biodiversity, landscape/townscape, material assets, population and social deprivation. Minor positive impacts are predicted in relation to archaeology, cultural heritage, crime and community safety, energy and climate, health and well-being, employment, soil, geology, land use, waste and water. The SA recommended the inclusion of a reference in the policy to protecting the setting of archaeological and cultural heritage features within St Giles Conservation Area; provide specific reference to improved pedestrian and cycle routes to the proposed redevelopment at the Telephone Exchange.

5.7 It is not considered necessary to include the reference to protecting the setting of archaeological and cultural heritage as this is sufficiently covered by Policy 1. It is also considered unnecessary to make specific reference to the need to improve pedestrian and cycle routes at the Telephone Exchange and this is addressed in Policy 9.

6. DELIVERY

6.1 WNELS confirmed that public sector intervention will be required to deliver the commercial elements of the strategic sites such as St John’s, Castle Station and Waterside. Public sector intervention is essential to the need to generate demand and promote the sites. Commitments from other sectors and agencies are required to ensure that the policies in the Central Area Action Plan are delivered.

6.2 Northampton Borough Council and the West Northamptonshire Joint Planning Unit will work in partnership with key partners to deliver strategic and local policies. West Northamptonshire Development Corporation, for instance, have already demonstrated their commitment to delivering key projects in the Central Area. For the Waterside area, particularly the western end, work has started on compulsory purchase orders on properties, to make way for the new developments. They were also involved in securing some of the funds for the development of the Becket’s Park Marina, which was completed in 2011.

6.3 Since the Publication of the CAAP, progress has been made on some of the key projects. In particular, the St John’s site has made significant progress. The Council is working with a developer committed to delivering the project and ongoing discussions are assisting with securing the appropriate viable mix of development, which is to be delivered to a high design standard.

6.4 In addition, Northampton’s Waterside was designated as an Enterprise Zone in July 2011, providing opportunities for professional, financial, leisure and business services and support through a relaxation of planning rules. It includes the potential to create high value commercial and industrial floorspace. Parts of the employment sites allocated in the Central Area Action Plan are included in the Enterprise Zone. This strengthens and supports the delivery of Policy 15 in terms of providing jobs in the designated areas.

6.5 Key delivery and funding mechanisms are:
7. CONCLUSIONS

7.1 Evidence shows that the town centre faces competition from out-of-centre strategic sites. To allow the town centre to be competitive, Policy 15 identifies a range of sites for office and business uses to be developed. The policy includes the safeguarding of existing sites but it has been formulated in a flexible manner, which enables alternative uses to be considered positively. Policies 23, 33, 34 and 35 allocate existing employment sites for offices and / or part of a wider missed use to ensure ongoing office provision for job creation over the plan period. Policies on Waterside, St John’s, Angel Street and Bridge Street (subject to further assessment elsewhere in the technical papers) will not only provide sites for offices but also offer regeneration opportunities.

7.2 Although national guidance no longer places employment uses within the B categories as key to creating jobs, the NPPF also seeks that offices are located in town centres. Evidence shows that there is a need to increase office jobs in the Central Area to assist with the competition it faces with out-of-centre facilities and to aid economic growth through increased consumer spend. Policy 15 aims to generate demand for office space in the Central Area.

7.3 Policy 15 and associated site specific policies therefore aim to ensure that the prospects of successfully regenerating the town centre are further enhanced by increasing the town centre’s economic position within the office employment market. This has been done by identifying a range of suitable and viable sites for delivery and safeguarding existing sites. The safeguarding of sites is not meant to represent an inflexible approach to policy; instead it demonstrates flexibility by allowing alternative uses, provided they deliver an alternative use which meets the strategic objectives for the Central Area.

Figure 2

<table>
<thead>
<tr>
<th>Consultee responses</th>
<th>NBC responses</th>
<th>Policy Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Policy 23: Upper Mounts</strong></td>
<td>The redevelopment of the site will result in additional traffic on the roads, but this is insubstantial in relation to the existing volumes.</td>
<td>Outcome: Amend policy 23 to include small scale employment in bullet point 1.</td>
</tr>
<tr>
<td>The proposed predominantly residential development area is going to result in traffic congestion around the Mounts, Overstone Road, Kettering Road and Wellingborough Road.</td>
<td>Given the use of the tight residential character of the area, large scale</td>
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<tr>
<td>Reinstate manufacturing and provide local jobs for local people in the near vicinity and contribute to boosting Northampton's economy.</td>
<td>manufacturing is not considered appropriate. However, there might be merit in the inclusion of small scale manufacturing / workshops which are still prevalent in the adjoining area that generally have a smaller impact, particularly in terms of lorry movements.</td>
<td>No change</td>
</tr>
</tbody>
</table>

<p>| Reference should be made about making Boot and Shoe Conservation Area a &quot;Boot and Shoe Quarter&quot; building a new museum to house the Central Museum's collection. Potentially situated on the Chronicle and Echo site it could be linked to the restoration of the Hawkins factory to provide a centralised factory outlet for all British manufacturers. Combined with an improved public realm that marks out the shoe trail noted in the English Heritage publication &quot;Built to Last&quot; and linkages connecting the Quarter with retailing and parking, buses etc at Greyfriars so to provide a specialised shopping area for footwear, much as the Jewellery Quarter in Birmingham | Whilst the principle of such a museum seems like a good idea, the delivery element is likely to be very difficult and does not currently accord with the plans for Northampton's Shoe Museum's collection, or with other plans being brought forward by leather craft industry supporters. The Angel Street development site (Policy 21) could provide an opportunity for an extension to the existing museum site, thus consolidating existing facilities and adding to the 'cultural quarter' role of this area. In addition the former Pearce's leatherworks on Wellingborough Road are being promoted by a Trust as a leather craft museum for which a Heritage Lottery Fund bid is being submitted. In these circumstances it is considered that an additional proposal for a museum within the Policy 23 is not justifiable and unlikely to be deliverable. The specialised footwear quarter is also a good idea in principle. However, again it's difficult in the short term to see how it can be delivered and a similar proposition is also part of the regeneration of Angel Street | No change |</p>
<table>
<thead>
<tr>
<th></th>
<th>/ St Johns.</th>
<th>Amend Policy 23 to include reference to community (including religious groups) uses.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bullet point 1.</strong> Whilst meeting places for worship are not always appropriate in residential areas there may be cases where this is appropriate if they primarily serve local residents. It would be good to highlight this fact within this policy.</td>
<td>It is considered that in principle community facilities can potential for religious groups and given the need for facilities in the Central Area, it is appropriate to highlight this specific use in the first bullet point of the policy.</td>
<td></td>
</tr>
<tr>
<td><strong>If this site is taken forward as a location for the Bus Interchange then it will not be possible to combine other development on it.</strong></td>
<td>There are no proposals within the Action Plan to locate the bus interchange at the Upper Mounts / Great Russell Street site.</td>
<td>No change</td>
</tr>
<tr>
<td><strong>The requirement to combine the Great Russell Street site with the Chronicle site to achieve 'comprehensive redevelopment' is neither justified nor effective.</strong> The requirement to develop predominantly to residential use has not been justified. It seeks to rule out alternative uses which may be appropriate. The range of uses as part of a mixed use or as a single development on the Chronicle Site should include Residential, Community, Offices, Leisure, Education, Cafe’s, restaurants, bars; and Local retail. The requirement for development to be 'compatible' with the adjoining listed building should be changed to 'the design should have regard to' listed building to ensure the plan is suitably flexible to encourage development. The exact requirement for</td>
<td>It is considered important that the sites are planned in a comprehensive manner, with activities on one site tying in with and not compromising development on the other site. The predominantly residential element of the policy reflects its current location in a primarily residential area, likely market demand and probable highways accessibility constraints, rather than any fundamental policy desire to see the site predominantly developed for residential purposes. With regards to the listed building, compatibility relates to the character and appearance of the development on the Mounts frontage. The point with regards to enhancing pedestrian connections to the town centre are acknowledged, however, without a clear understanding of the amount of development on site, it is</td>
<td>Amend Policy 23 bullet point 1 to: &quot;Be planned in a comprehensive manner to deliver a mixed use scheme to include, some or all of the following uses: residential, office /small scale employment, community (including religious facilities), leisure, educational and small scale retailing.&quot;</td>
</tr>
</tbody>
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| Public realm improvements and the provision of enhancing pedestrian connections should be clarified and should recognise that the requirement for improved pedestrian access is not as direct result of the development. Accordingly the wording should reflect a 'contribution towards' these areas, proportionate to the level of development over and above that which exist, or previously existed at the site. | difficult to provide certainty about the level of contribution towards such connections. |

**Policy 33: Freeschool Street**

Absurd to build on contaminated land (gas holders)

Housing will add to congestion

Doesn't see how this "unattractive area" justifies the proposed development as Marefare and Gold Street have similar facilities

The land on the site does not currently contain gasholders, these are located across the road.

The modelling of the town centre shows that there will be increased traffic generated both from development within the town centre and outside. Selected junction improvements identified in the Action Plan will assist in reducing congestion. As is currently the case, in the future on street parking is likely to not meet demand from residents. There is likely to be some car parking provided in association with new development. However as has occurred previously there will be the opportunity for developers to provide car parking within the public car parks, or for residents to purchase their own permits.

The redevelopment will remove a poor quality environment and lead to a more intensive use of land | No change
that is currently not being used to the level that would be anticipated within a town centre. Its redevelopment will enhance the vitality and viability of the town centre and reduce the need to find additional greenfield land on the edge of town.

There should be presumption against development on the scheduled part of the site, unless it can be achieved without damage to the archaeological deposits. Concern that comprehensive redevelopment of the site will result in the loss of the Marefair frontage - and interesting mixture of shops and restaurants. Policy principles within PSS5 apply when considering proposals for change in this area. The Sustainability Appraisal fails to recognise the implications of the proposed development for the Scheduled Monument and Marefair frontage.

Policy 33 amended to: "Freeschool Street will be regenerated…"

Amend Policy 33 Bullet Point 2: "Ensure that development takes account of and positively addresses the Scheduled Monuments"

Amend Sustainability Appraisal to make reference to the Scheduled Monument.

<table>
<thead>
<tr>
<th>Policy 34: Former Royal Mail depot, Barrack Road</th>
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</thead>
<tbody>
<tr>
<td>The building would be best suited to industrial use. There is no need for additional housing. NBC should engage with business in attracting manufacturing to the site</td>
</tr>
<tr>
<td>The existing use of the building would allow its change of use to general industrial use. However, given its primarily residential location, it is considered that if it is to be reused / redeveloped that a business use that is more ‘neighbour’ friendly would be more appropriate, e.g. within the B1 use class. The Core Strategy identifies that Northampton needs a significant amount of additional residential</td>
</tr>
<tr>
<td>No change</td>
</tr>
<tr>
<td>The Royal Mail site is currently entirely redundant, in single ownership and deliverable in the short term. It has been vacant since 2003. It is highly accessible, including by foot from the Castle Ward. The building is structurally sound, does not lend itself to B1 or residential, but is ideally suited to a Foodstore, bringing significant regeneration benefits.</td>
</tr>
<tr>
<td>The town centre is considered an appropriate location for offices and housing. If the reuse of the site is for residential purposes there is likely to be some car parking provided in association with new development. There will be opportunities for developers of both offices and residential uses to provide car parking within the public car parks, or for residents to purchase their own permits. The Central Area Character Assessment and Tall Buildings Strategy, which was undertaken by experienced urban designers and assessors of tall buildings, identifies this building as having a negative impact on the skyline. It is a building that in terms of its height, bulk, lack of positive design external features and materials is totally incongruous in its setting. Bullet point three addresses</td>
</tr>
</tbody>
</table>

**Policy 35: Former Telecoms Exchange**

Limited car parking opportunities in the area mean offices and housing are inappropriate on this site.

Questions the negative impact on the skyline, and thinks other blocks are as bad (Bloomsbury Court Guildhall Road) and Newlife blocks.

Suggests turning the former Citizens Advice Bureau into a shop or for use by a charity.
<table>
<thead>
<tr>
<th></th>
<th>this point sufficiently.</th>
<th>Support noted. The setting issue is addressed by CAAP Policy 1.</th>
<th>No change</th>
</tr>
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<tr>
<td>Support the development of this site that respects its location within the setting of 2 Conservation Areas.</td>
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</table>
1. INTRODUCTION

Context

1.1 The Central Area is currently home to around 9% of Northampton's population. Most of the housing stock in the Central Area is pre-war (1939). Spring Boroughs, a substantial residential area in the Central Area, is within the top 5% of deprived areas in England and has a range of poor quality housing which needs to be significantly improved or replaced.

1.2 There are 3 main reasons why Policy 16 was formulated:

- Firstly, there has been a significant amount of investment in residential development within the Northampton Central Area over the last ten years. This has predominantly been through the provision of apartments especially smaller units with 1 or 2 bedrooms. However, the market for these properties is has been disrupted by prevailing economic conditions. Nevertheless, as a result in terms of recent history there has been a lack of opportunities for family housing in the Central Area this is contrary to wider objectives of providing for balanced communities. Within parts of the Central Area housing provision needs to be more balanced providing more opportunities for families to live in the town.

- Secondly, The University of Northampton, which is located outside the Central Area, is seeking the development of purpose built student accommodation as part of its expansion plans. An initial site has been identified at St John's which now has a planning permission. This will accommodate around 450 students, nevertheless there is likely to be a long term need for more accommodation. Its likely that the preference from the University and students is for this to be located within the Central Area. An increased student population would also contribute to vibrancy and viability of the Central Area. Student accommodation will need to be located in appropriate sites within the Central Area to ensure it meets acceptable standards and that there is no adverse impact on surrounding areas.

- Thirdly, providing an appropriate range of residential accommodation within the Central Area, in terms of types and tenure, is important if the aim of creating a sustainable and vibrant town is to be achieved. Bringing more people into the centre to live will add to the vitality and viability as residents will use restaurants, shops, leisure and other facilities on a regular basis. This also increases public mobility by providing access to transport services other than the private car.

1.3 Policy 16 aims to ensure that sites are made available for a wider range of housing development, which will encourage more people to live in the town centre and use its facilities.
facilities. Provision for student accommodation will also strengthen the town centre’s connection with the University.

2. PLANNING POLICY CONTEXT

a. National policy

The NPPF in section 6 ‘Delivering a wide choice of high quality homes’ paragraphs 47-51 sets out how it is anticipated that Local Planning Authorities will address providing suitable housing in terms of supply, mix and tenure type to meet needs.

b. Regional Policy

The Regional Plan for the East Midlands (RSS8) includes a requirement to provide the majority of new housing development in the Northampton Implementation Area (NIA) as part of the housing framework for West Northamptonshire.

c. Strategic Policy

The requirements for additional housing development has been reflected in the strategic policy direction provided contained in the pre-submission draft of the West Northamptonshire Joint Core Strategy (February 2011). Policy S3 seeks the provision of 50,150 net additional dwellings in West Northamptonshire, with 26,200 allocated for Northampton Borough up to 2026.

Policy H2 expects new housing development to provide a mix of house types, sizes and tenures to cater for different accommodation needs. Policy N1 indicates that the regeneration of Northampton will be supported by housing development within the existing urban area through urban capacity infill.

d. Local Policy

Northampton Corporate Plan 2012 – 2015

This housing policy will contribute towards meeting the following Council priority:

- Priority 2: Invest in safer, cleaner neighbourhoods – a place where visitors and residents from all communities feel safe, secure and protected with low levels of crime
- Priority 5: Better homes for the future – local housing needs provided for
- Priority 7: Promoting health and well being – improved public health

3. KEY EVIDENCE BASE AND POLICY FORMULATION

3.1 The following technical studies have been used to inform and formulate CAAP Policy 16.

People and Places Strategy (CACI / Scott Wilson, 2008)

3.1 This strategy was commissioned by West Northamptonshire Development Corporation (WNDC). The Strategy was intended to help WNDC attract the target markets
necessary to achieve their vision for the West Northamptonshire. This document helps to identify the socio-demographic groups that Northampton needs to attract and retain; what type of market housing that will attract them and what subsequent actions need to be taken.

3.2 The Strategy identified the most affluent 8 ACORN groups as the most important to attract with respect to new market housing. ACORN is a geo-demographic segmentation of the UK’s population which segments small neighbourhoods, postcodes, or consumer households into 5 categories, 17 groups and 56 types. ACORN is used to understand people’s lifestyle, behaviour and attitudes, or the needs of neighbourhoods and people’s public service needs. It is used to identify specific needs of each local community. The identified 8 ACORN groups are as follows:

- Wealthy Executives;
- Affluent Greys;
- Flourishing Families;
- Prosperous Professionals;
- Educated Urbanites;
- Aspiring Singles;
- Starting Out; and
- Secure Families.

3.3 The research identified that a crucial element to the improvement of the vibrancy and vitality of the Northampton Central Area is to attract a younger target group. Those younger people in socio-demographic groups, such as starting out, educated urbanites and aspiring singles seek urban living lifestyles with preferences for living in a flat within walking distance of the town centre, near a vibrant mix of activities. In terms of Northampton’s central area characteristics, these groups of people are more likely to be attracted to housing within or adjacent to the inner ring road which is located close to town centre uses. The rest of the groups in general have a preference for living in detached/semidetached/terraced houses in the suburbs of a town. Those groups of people are more likely to be attracted to housing developments outside the town centre boundary. Therefore, the strategy proposes that higher density flats and terraced houses should be sought in more central locations to meet the aspirations of younger target groups and the more suburban urban extensions should aim to provide detached and semi detached homes of between 2 and 5 bedrooms as part of the housing mix.

3.4 This strategy also referred to the need to provide a residential environment that would attract the target groups successfully. The elements that can increase the attractiveness of new residential properties to these targeted groups include the design of homes and the character of neighbourhoods. For example, such groups would be attracted to housing design that minimises noise transmission, the safety and attractiveness of the neighbourhoods and access to private gardens. The strategy therefore proposes to require attainment of higher levels of the Building for Life (BfL) standard and achievement of a high Code for Sustainable Homes score in order to create a desirable residential environment for the target groups. Design consideration for housing and all other schemes are addressed in Policy 1: Promoting Design Excellence. These principles are also included in Policy S10: Sustainable Development principles of the West Northamptonshire Joint Core Strategy (pre-submission draft February 2011).
3.5 To manage the delivery of appropriate mix of housing, to attract different groups of people into the town, Policy 16 seeks to allocate sites for residential development.

3.6 The Council acknowledges that the student population will also contribute to the viability and vitality of the Central Area and help create mixed communities. Providing student accommodation will not only encourage investment in the evening economy in the short term, but promote local job creation as part of the integration with the University in the medium to longer term.

**Strategic Housing Market Assessment (SHMA) (Opinion Research Service June 2010)**

3.7 The SHMA was commissioned by the West Northamptonshire Joint Planning Unit, with support from Daventry District Council, Northampton Borough Council and South Northamptonshire Council. It provides an assessment of market and affordable housing needs and identifies the amount and type of housing required in West Northamptonshire. This study was based on the housing requirement set out in the East Midlands Regional Plan.

3.8 It concluded that Northampton has a relatively low proportion of detached properties (27%) and a relatively high proportion of terraced housing (35%) and flats (8%) compared to other local authorities within West Northamptonshire. Northampton has the highest proportion of social housing (mainly in the form of local authority owned properties) in the sub-region. Compared to all households in West Northamptonshire, the social rented sector contains proportionately many more single parents, pensioners and fewer couples with or without children. Northampton in particular contains more single person households (21%) compared to the other local authorities in West Northamptonshire. There is also a lack of smaller social stock available for households on low incomes.

3.9 The study estimated that 67% of social housing should be 1 and 2 bedrooms in NIA, although in terms of stock management and meeting housing needs, it is not considered that this is the proportion of smaller properties that should be built. 1 bedroom units in particular lack flexibility and are not favoured by Registered Providers. As for market housing, the requirement is estimated to be for larger 3, 4 and 5 bedroom homes which should form 68% for Northampton.

3.10 This assessment also identified that Houses in Multiple Occupation (HIMOs) form a significant part of the private rented housing sector across Northampton. The Housing Strategy Statistical Appendix (HSSA) 2008 for the three authorities in West Northamptonshire estimated that there were 2,570 HIMOs in the sub-region with all but 34 of these being located in Northampton. The majority are located in or very close to Northampton Central Area as identified by the Council’s Private Sector Housing Solutions Team.

3.11 Policy 16 will seek to deliver an appropriate mix of housing tenure and size in the Central Area.

**4. PUBLIC CONSULTATION**

4.1 The Council undertook a series of public consultation exercises which have been used to shape the policy further.
a. **Issues and Options (September – November 2007)**

4.2 Feedback from this consultation event can be summarised as follows:

- Residential development provoked wide-ranging responses. A mix of housing types were suggested ranging from apartments, affordable housing, mixed schemes of affordable, private and mixes of apartments and houses. There was strong support for apartments and flats to accommodate young/elderly/starters within the Central Area but avoiding high rise buildings. Significant residential development was most popular, by a small margin, in Great Russell Street.

- It was generally felt that the population structure of Spring Boroughs should be more balanced by attracting more families and dual person households to the area. Other locations requiring regeneration were suggested within the town.

- More proactive use of units above shops was suggested to generate vibrancy and to provide opportunities for young people and students for Central Area living.

- Safety around the Central Area was felt to need improvement. Measures that could be taken include improving existing public spaces; better street lighting and providing more green space.

b. **Emerging Strategy Consultation (August/September 2009)**

4.3 The majority of concerns highlighted from this feedback were similar to the concerns identified by the previous consultation. These include providing a good mix of housing types and tenure including a range of small units of apartments and family housing and a good mix of private and affordable housing. Improvement of housing standards and population structure in Spring Boroughs were also highlighted.

4.4 Residential development within mixed use schemes and redevelopment in redundant industrial areas were also supported. Residential use within mixed use development was considered to help make the evening economy more vibrant. The importance of creating well designed housing developments was mentioned to create strong communities.

Pre-submission draft consultation (November/December 2011)

4.5 Full details of the consultation responses for the pre-submission draft can be found in Figure 3 at the end of the part of the technical paper that deals with Policy 16. There was support for the policy and commitment provided to its delivery. There were also concerns expressed in relation to the following:

**Housing numbers**

4.6 There were concerns as to why this amount of housing is required whether the Council is seeking to increase its population by this amount. It was confirmed that the dwelling numbers will contribute to the requirement to provide additional housing in West Northamptonshire, which is based on evidence of need.
**Employment sites**

4.7 Concern was expressed at the potential loss of employment sites to housing. It was clarified that suitable sites will be retained for employment whilst non-viable sites will be considered for alternative uses.

**Student accommodation**

4.8 It was questioned why this should be provided in the Central Area and whether the location is suitable, considering the location of campuses out of town. Concern was expressed on the impact of traffic and parking. From a policy perspective, having student accommodation in the town will increase the prospect of the University investing more in the Central Area. It is likely that the provision of parking for students will be limited. Together with parking enforcement in the Central Area, this will limit student car ownership in the town centre unless students use commercial car parks. Good public transport links exist within the town centre; further patronage will be encouraged.

**Flooding**

4.9 There were concerns expressed about flooding. The Council will use government policy and technical work done in association with the JCS and the CAAP to ensure that appropriate mitigation measures will be in place when delivering these schemes.

5. **SUSTAINABILITY APPRAISAL**

5.1 Policy 16 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 Air Quality Management Areas (AQMAs) in the vicinity of Great Russell Street and Bridge Street.

5.2 Significant positive impacts are predicted in relation to population, social deprivation, soil, geology and land use. Minor positive impacts are predicted in relation to archaeology, cultural heritage, biodiversity, energy and climate, landscape/townscape, material assets, waste and water.

5.3 An uncertain impact is predicted in relation to crime and community safety, as there is no specific reference to improving community safety in this area, which has a higher than average level of crime due to its night-time economy.

5.4 The appraisal recommended the following mitigation measures:

- 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

5.5 The Council does not consider it necessary to include the above proposals because these are covered by specific policies elsewhere, e.g. parking standards, or detailed design issues which will be considered at the planning application stage.
5.6 The appraisal recommended the following enhancement measures:

- include specific cross-reference to Policy 5 where new housing development is proposed within a Flood Zone (i.e. at The Waterside and Bridge Street).

5.7 This is not considered necessary as all developments, including housing, which are in Flood Zones will automatically need to comply with Policy 5.

6. DELIVERY

6.1 The majority of the housing development sites will be delivered by the private sector with contributions from the University of Northampton in terms of the requirements for, and delivery of, student accommodation.

6.2 Key delivery and funding mechanisms are:

- West Northamptonshire Development Corporation
- Growth Area funds
- Private sector developers
- Private public sector partnership arrangements
- Network Rail (for Castle Station development)
- Housing Associations/ Registered social landlords
- Homes & Communities Agency
- University of Northampton (for student accommodation)

6.3 West Northamptonshire Development Corporation, for instance, have already demonstrated their commitment to delivering key projects in the Central Area. For the Waterside area, particularly the western end and Avon / Nunn Mills, work has started on compulsory purchase orders on properties, to make way for the new developments.

6.4 The take up and mix of housing sites within the Central Area will be monitored throughout the plan period.

7. CONCLUSIONS

7.1 The policy will contribute towards the delivery of the following:

- More family housing to secure a balanced community predominantly in areas outside the town centre
- Higher density dwellings within the town centre to meet future demand
- A better mix of dwellings and affordability to provide everyone with an opportunity to have their own home
- Students will be able to find accommodation in town, and contribute to the vibrancy of the town centre.
The majority of the housing development sites will be delivered by the private sector, with contributions from the University of Northampton in terms of the requirements for and delivery of student accommodation.

Key delivery and funding mechanisms are:

- West Northamptonshire Development Corporation
- Growth Area funds
- Private sector developers
- Private public sector partnership arrangements
- Network Rail (for Castle Station development)
- Housing Associations/Registered social landlords
- Homes & Communities Agency
- University of Northampton (for student accommodation)

West Northamptonshire Development Corporation, for instance, have already demonstrated their commitment to delivering key projects in the Central Area. For the Waterside area, particularly the western end, work has started on compulsory purchase orders on properties, to make way for the new developments.

The overall growth of Northampton is set out within the Joint Core Strategy. As part of the planned increase in housing numbers to meet the future needs of the existing population the Joint Planning Unit has been in extensive conversation with the General Hospital and Primary Care Trust about the provision of additional health care facilities. In the future, minor or short stay operations are more likely to be dealt with through 'super surgeries' rather than people requiring the acute services of the hospital. This will free up more capacity at the hospital to deal with the most acute healthcare issues.

The type of new health facilities required and dates for their implementation have been identified in the Infrastructure Delivery Plan attached to the Joint Core Strategy. Funding for these facilities will come through mechanisms such as the NHS, developer planning obligations and Community Infrastructure Levy.

It appears to justify the new restaurants, shops and leisure.

It is not the case that the dwellings proposed in the
faculties in the Central Area
3400 plus additional dwellings are being proposed to be built by 2026.

Significant levels of unemployment mean that existing business areas should be used for new employment opportunities, not residential development.

Student Accommodation: Illogical and unsustainable to build student accommodation in the centre as campuses are well outside. It will increase traffic congestion and environmental pollution.

The main locations for the 3400 homes are areas of traffic congestion and on the floodplain. Unless residents do not have cars there will be significant congestion. Concern on what will happen when the River Nene floods.

Does the planning authority intend to actively increase the population of Northampton by at least 3400 extra people by 2026?

Its unsustainable and environmentally unsound to demolish redundant industrial sites and build houses from new building materials.

Central Area are being used to justify the additional restaurants, shops and leisure facilities. They will add more demand for such facilities, but there is a need to meet the capacity requirements of the existing population in a town centre location as well as the increase in the population of the town that would occur naturally in any case.

The Action Plan is seeking to provide substantial job opportunities through the promotion of sites for retail and office use. It is proposed that existing business areas that are considered appropriate for continued business use will be safeguarded, those where it is unviable will be released for other uses.

The provision of purpose built student accommodation in the Central Area will be positive for its vitality and viability and also increase the attractiveness of the University to potential students. It is likely that provision of parking for students will be limited. This, together with parking enforcement within the Central Area, will limit student car ownership in the town centre, unless the students use commercial car parks. Whilst it will mean students will travel between the town centre and the campuses on public transport, this will be against the general flow of traffic and could enhance the viability of bus services as
the buses will have more patronage going in the opposite direction to normal commuter flows. In the longer term it is also likely to encourage a greater presence of University functions within the town centre.

The modelling of the town centre shows that there will be increased traffic generated both from development within the town centre and outside. Selected junction improvements identified in the Action Plan will assist in reducing congestion. As is currently the case, in the future on street parking is likely to not meet demand from residents. There is likely to be some car parking provided in association with new development. However, there will be the opportunity for developers to provide car parking within the public car parks, or for residents to purchase their own permits.

The Plan does not promote development on undefended greenfield sites. The Council has followed advice in NPPF in terms of the sequential approach to site selection in seeking to avoid inappropriate uses within the floodplain on brownfield land. Nevertheless the town does need a significant amount of regeneration in areas that have historically flooded. In these cases the Council has followed the exceptions test in NPPF, this together with site specific flood risk
assessments will ensure that people and buildings are not put at unacceptable risk by future development in defended floodplain areas. This is likely to mean that building floorplates occupied by people will be above flood levels, either through placing those buildings on raised ground, or having them above uses such as service areas or car parking.

The demographic of Northampton is such that even if the area was not attractive to in-migrations, the existing population will grow substantially. The need for additional housing and numbers required is set out in the Core Strategy.

Those areas where reuse of existing premises will be promoted are supported in the Action Plan. Given the need to regenerate, there will be substantial areas of renewal. The Core Strategy sets out standards to ensure that development is delivered to higher environmental standards than has been the case previously.

<table>
<thead>
<tr>
<th>Welcomes the housing proposals. Urges that this development does not affect the operational use of the site.</th>
<th>The support for residential uses is welcomed. Supported by the HCA there is a programme of relocating existing businesses included CEMEX’s operations at the right time to other appropriate areas in the vicinity.</th>
<th>No change</th>
</tr>
</thead>
<tbody>
<tr>
<td>More provision should be made for larger dwellings for extended families. This would be cost-effective as it would enable families to look after elderly</td>
<td>The West Northamptonshire Strategic Housing Market Assessment did not identify this as a significant issue to address. The Core Strategy</td>
<td>No change</td>
</tr>
</tbody>
</table>
relatives at home. consequently does not have a policy that specifically seeks larger housing for extended families, although it does seek a mix of housing in new developments. For general market housing, it will therefore primarily be a decision of the market as to whether it seeks to provide these types of dwellings. With regards to affordable homes a requirement for some larger homes has been identified and these will be negotiated where it is considered that the site is appropriate.

| It is agreed that there should be more family housing on the outer developments of the Central Area but it must be ensured that there is good connectivity by walking/cycling between these housing and local leisure, green space, education, employment opportunities and with the town centre as well as there being on site facilities e.g. play areas. | Pedestrian/cycle movement framework has been developed to ensure those major destinations including the housing developments are well connected by walking/cycling. This movement framework can be found in Figure 5.1 and Figure 5.2. | No change |

| The final sentence of policy 16 should be removed, so that developments within the Town Centre Boundary are not exempt from the requirement to provide a mix of dwelling types and sizes. At a recent consultation meeting on the housing element of the WNJPU's Joint Core Strategy, held at The Guildhall, Northampton on 30th November 2010, it was stated that developments with mixed sizes and types of housing would be preferred in future. The CAAP should share the same strategy with the Joint Core Strategy. | The evidence base demonstrates that there is a need to provide 1 and 2 bedroom properties to meet existing need and also attract younger professionals to Northampton. The policy does not seek to preclude family housing inside the town centre. It does however take a pragmatic approach in recognising that the existing character of the area, together with the likely development sites that will come forward, means that family housing is unlikely to be the predominant housing type within the town centre. On this basis it is likely to | No change |
approve housing developments in this area where there is likely to be a predominance of 1 and 2 bed properties.
STRATEGIC SITES
1. INTRODUCTION

Context

1.1 At present Greyfriars bus station, opened in 1976, acts as the hub for bus services in Northampton, accommodating over 1,000 bus movements per day. Whilst still functioning adequately as a bus station, the building and environment in and around it is considered to have a significant negative impact on the character of the area due its monolithic scale, subways, lack of pedestrian permeability and public safety issues. In addition, above the Greyfriars bus station is approximately 14,000 sq.m of vacant office floorspace which no longer meet the requirements of a modern office accommodation. The maintenance of this office floorspace is a significant financial burden for the Council, as managers and operators of the building.

1.2 The planned redevelopment to the Grosvenor Centre will extend north encompassing the Greyfriars bus station site. Under the Developer Agreement signed in November 2009, Northampton Borough Council (NBC) is obliged to provide Legal and General (L&G) with vacant possession of the site to facilitate the Grosvenor Centre redevelopment. This means that the existing bus station will need to be demolished. However, a replacement bus station site will need to be identified and progress made on its development before the Grosvenor Centre redevelopment can get underway.

1.3 There are several benefits in relocating the bus station from Greyfriars, which include;

- Allowing major private sector investment in Northampton town centre;

- Relieving NBC of financial burden around the maintenance of Greyfriars bus station and associated office floorspace; and

- Providing a modern high quality bus interchange facility in Northampton town centre.

1.4 The Northampton Bus Interchange: Appraisal Report (MGWSP, June 2011) determines the location of the new bus interchange facility, which is at Fishmarket. Also included in the report is the desired specification and funding / delivery mechanisms for the new facility. The report provides a clear recommendation to funding partners, West Northamptonshire Development Corporation (WNDC), for the delivery of a new bus interchange at a location agreed by Northampton Borough Council, Northamptonshire County Council, Legal and General and supported by Bus Operators.
2. POLICY CONTEXT

National Planning Policy

2.1 The NPPF seeks to promote sustainable transport and paragraph 31 sets out the requirement for local authorities and transport providers to develop strategies for the provision of viable infrastructure to support sustainable development.

Regional Planning Policy

Regional Plan for the East Midlands: Regional Spatial Strategy 8 (RSS8) (March 2009)

2.2 The regional plan contains a broad strategy towards reducing the need to travel, promoting sustainable transport measures in favour of using private vehicles.

Strategic Policy

West Northamptonshire Joint Core Strategy (WNJCS) – Pre Submission (2011)

2.3 The Pre Submission WNJCS contains a number of policies that are relevant to setting the context for the Central Area Action Plan’s approach to transport. This includes: C1: Changing Behaviour and Achieving Modal Shift; C2 New Developments; C4: Connecting Urban Areas; C5: Enhancing Local and Neighbourhood Connections; N1: The Regeneration of Northampton; N12: Northampton’s Transport Network Improvements.

2.4 In summary, these policies set out the need to improve access to, promote the use of and make provision for walking, cycling and public transport networks and facilities. They set out the need to ensure walking, cycling and public transport networks connect with key facilities and services and link to key transport interchanges.

Corporate Plan (2012 – 2015)

2.5 This policy will contribute towards the following objectives:

Priority 1: Northampton on track – an economically prosperous, successful and vibrant Town; increased number of visitors; delivery with partners of major town centre regeneration projects such as the redevelopment of Grosvenor Greyfriars, a new bus interchange and the redesign of the railway station
Priority 7: Promoting health and well being – improved public health
3. KEY EVIDENCE BASE

a) Technical Studies

Northampton Bus Interchange: Appraisal Report (MGWSP, June 2011)

3.1 This report appraises a selection of potential sites against their ability to meet the development specification, stakeholder and operator needs and delivery / funding timetables. The sites under consideration, partially borne out of the original Bus Interchange Study (MGWSP, March 2010), were the Fishmarket, Fishmarket (land in NBC ownership), Lady’s Lane on-street, Lady’s Lane integrated and Upper Mounts car park.

3.2 The scope of the report clearly establishes the key built requirements for a new bus interchange facility such as; the configuration of bus bay and passenger waiting areas, the number of bays, accessibility, enclosed passenger waiting area and the passenger facilities at the interchange. Having established the development specification each potential site was appraised against key environmental, social and economic objectives in the context of the various strands of data relating to costs, land assembly, heritage constraints etc and supporting technical surveys undertaken by MGWSP. The formal appraisal process was led by MGWSP, with NBC, NCC and L&G inputting to ensure that the process was robust and transparent, and that final conclusions met the needs of the key delivery partners.

3.3 The Fish Market site (land in NBC ownership) consistently scored the highest throughout the appraisal process particularly on operational, deliverability and economic issues. The Upper Mounts car park scored well for some aspects of deliverability, but less well for social and operational aspects. The other locations on Lady’s Lane did not perform well through the appraisal due to significant delivery challenges and negative social impacts such as increasing north-south pedestrian severance.

3.4 In summary, the Report recommended the Fish Market site (land in NBC ownership) the preferred location for the bus interchange for the following reasons:

- Location - Easy pedestrian access to the Market Square and Grosvenor Centre;
- Policy - Alignment with the Council’s vision town centre for the town centre. In addition, the report identified the potential to sensitively enhance the historical character of the Holy Sepulchre Conservation Area and bring other nearby vacant heritage building back into use;
- Site availability – The site is in the ownership of NBC and could be developed relatively quickly and would avoid the need for a temporary bus interchange during the construction period; and
Future proofing – Additional capacity for buses is available on the Drapery.

Northampton Bus Interchange Study (MGWSP, March 2010)

3.5 This study identified potential locations for a new bus interchange facility and determined baseline requirements to meet passenger and operators needs. In addition, the study also set out a best practise review to help determine minimum design standards for a new bus interchange. Key considerations in developing the study and identifying potential sites were

- Northampton’s anticipated growth, from 93,629 dwellings (2009) to an estimated 125,000 (2026); and
- the Northamptonshire Town Strategy for Growth which identifies modal shift targets in Northamptonshire.

3.6 A range of potential locations for a new bus interchange were identified and then evaluated against the following criteria:

- pedestrian accessibility;
- the number of buses operating within / close to the facility;
- the ease of re-routing;
- on-street constraints;
- implications on CAAP development proposals and
- if improvement to one of the above conditions would make an option more viable.

3.7 In conclusion, six potentially viable development options across the following three locations were identified; Drapery, Fishmarket and Lady’s Lane. The Northampton Bus Interchange: Appraisal Report (2011), outlined above, progressed this study further in order to identify a final site for the bus interchange.

Northampton Bus Development Plan (with revised housing growth) (MGWSP, November 2010)

3.8 This study provides a review of the bus network in the town of Northampton. It identifies where short term improvements could be made to strengthen the bus network and increase modal shift away from the car. In addition, medium to long term improvements have been identified to support the development growth identified for Northampton up until 2026. The housing growth assumptions contained within this report have subsequently been updated by Northamptonshire County Council in November 2010 to reflect the preferred growth options within the Core Strategy.

b) Public Consultation

3.9 The preparation of the Central Area Action Plan involved a series of public consultation exercises, which have been used to progress, shape and formulate policies. The consultation feedback on Issues and Options,
Emerging Strategy and Pre Submission relates to the former, criteria based bus interchange policy. Due to changes in the delivery timetable and the progression of the associated evidence base this policy was the changed to site specific through Focused Changes to the CAAP.

1. **Issues and Options (September/ November 2007)**

3.10 Feedback from the Issues and Options consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>- In general representations supported keeping Greyfriars bus station in its current form. However there was some support for replacement facility on the existing site, or elsewhere in the town centre.</td>
<td>• The potential for providing a new bus interchange as part of the new Grosvenor Centre was examined as part of the Northampton Bus Interchange: Appraisal Report (MGWSP, June 2011). Following the appraisal of all alternative sites the Fishmarket site proved to be the best location for a new bus interchange.</td>
</tr>
<tr>
<td>- Support for improving the quality of the passenger environment at a new facility, with particular reference made to increasing the amount of natural light and providing at grade pedestrian access.</td>
<td>• Policy 7 specifies development criteria for the Bus Interchange, this includes reference to providing a pleasant and safe environment equally accessible by all.</td>
</tr>
</tbody>
</table>

2. **Emerging Strategy Consultation (August/September 2009)**

3.11 Feedback from the Emerging Strategy consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>- No need to demolish the Greyfriars bus station, it just requires investment and a higher standard of maintenance.</td>
<td>• The scale of Greyfriars and office floorspace above make the building unviable to maintain. In addition, the demolition of Greyfriars is required to facilitate the redevelopment of the Grosvenor Centre, a key local and regional objective.</td>
</tr>
<tr>
<td>- The overall reliability and routing of bus services needs improving</td>
<td>• The new interchange will provide new real-time bus timetabling and will mean a change to routing and timing of some routes.</td>
</tr>
</tbody>
</table>
• The bus interchange should be provided at Castle Station to provide a real transport interchange.

• This option was considered as part of completing the Northampton Bus Interchange Study and not considered viable. In addition, there was lack of support from bus operators and the general public who largely favour a centrally located interchange.

3.  Pre Submission Consultation (November 2010)

3.12 Feedback from the Pre Submission consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Reword fourth bullet, replace undercover with &quot;indoor&quot; as is included in the existing provision at Greyfriars.</td>
<td>• Policy 7 references the need for the Bus Interchange to provide ‘an undercover waiting area’ in a ‘pleasant and safe environment’ this is deemed sufficient.</td>
</tr>
<tr>
<td>• Greyfriars remains an appropriate bus interchange and suffers from the poor standard of maintenance provided by NBC.</td>
<td>• Greyfriars is an economic drain on NBC due to its size and vacant office floorspace above the bus station itself. The CAAP seeks to ensure that the Greyfriars site is used positively in new development, and to provide a high quality bus interchange replacement facility.</td>
</tr>
<tr>
<td>• The new bus interchange facility should be a covered facility.</td>
<td>• Policy 7 refers to the provision of an undercover waiting area as part of a new bus interchange.</td>
</tr>
<tr>
<td>• Technical objection to the specific policy criteria for the development of the Bus Interchange.</td>
<td>• The Policy sets out criteria for proposals to deliver a high quality bus interchange. These requirements are considered to be compatible with the feasibility and delivery of the project.</td>
</tr>
<tr>
<td>• CAAP should make explicit reference to the number of bays required at the new bus interchange.</td>
<td>• The policy identifies the need to provide sufficient capacity to cater for demand to 2026.</td>
</tr>
<tr>
<td>• Paragraph 6.2.5 relating to the Grosvenor Centre and the bus interchange should be amended to remove &quot;to replace the existing bus station with something more suited to</td>
<td>• The Bus Interchange location has been confirmed through Policy 7 and is no longer part of the Grosvenor Centre redevelopment.</td>
</tr>
</tbody>
</table>
enhancing the public transport offer and use”.

3. **Focused Changes to CAAP (December 2011)**

3.14 Feedback from the Focused Changes to CAAP consultation event can be summarised as follows:

<table>
<thead>
<tr>
<th>Summary of Representation</th>
<th>Policy Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>The bus interchange should be located adjacent to the new shopping centre.</td>
<td>The Fishmarket site lies adjacent to the proposed extension to the Grosvenor Centre (Policy 17) and has good links to the rest of the town centre.</td>
</tr>
<tr>
<td>Policy 7 should make provision for the appropriate protection of buildings in the conservation area, as well as ensure that the Bus Interchange appropriate provision is made for archaeological assessment and evaluation during the construction period.</td>
<td>It is considered that the Policy 7 read in conjunction with Policy 1 (Delivering Design Excellence) signposts the importance of preserving and enhancing conservation areas and heritage assets. As the development site lies partially within a conservation area and is adjacent to listed buildings a full heritage assessment will be required to support the planning application. In addition, <em>The Bus Interchange Site Selection Appraisal Report</em> underpinning Policy 7 highlights the potential for archaeological remains on the site; therefore an archaeological assessment will also accompany a future planning application.</td>
</tr>
</tbody>
</table>

The Fishmarket site has been promoted as the bus interchange site very late in the planning process and the preparation of the CAAP. Indeed, the delivery of the Bus Interchange is timetabled to reach planning application stage in February 2012, before the CAAP has reached the examination stage and therefore pre judge the planning policy process.

The Council acknowledge that the Fishmarket site has been put forward as the preferred development site at a late stage. However, the identification of a deliverable and viable site became necessary to ensure the delivery of wider town centre regeneration e.g. the Grosvenor Centre (Policy 17). Furthermore Policy 7 is underpinned by an up to date and robust site selection process, see *The Bus Interchange Site Selection Appraisal Report* (MGWSP, 2011).

*The Bus Interchange Site Selection*  
The methodology used to undertake
**Appraisal Report (MGWSP, 2011)** does not adequately address the historic environment. Any proposals for the demolition of buildings in advance of an assessment of the merits of a detailed development proposal would be inappropriate and premature.

Suggested text amendments to Policy 7, to ensure historic building frontages are maintained and the character of the All Saints Conservation is preserved / enhanced through this development.

In addition, it is worth noting that English Heritage took the decision not to formally list the Fishmarket building following a recent application made by a member of the public.

It is considered that there is sufficient detail and clarity in Policy 7 together with Policy 1 (Delivering Design Excellence) to ensure heritage assets and the character of conservation areas are preserved and enhanced.

Legal and General are in full support of the proposals for new bus interchange, which Northampton Borough Council will be responsible for delivering; any supporting text for Policy 8 should be amended to reflect this.

Suggests various text changes to Policy 7 to remove specific delivery requirements for the new interchange and build more flexibility into the policy.

The Council consider that the current approach to Policy 7 is acceptable.

The revised policy seeks development to have strong connections with the town centre, Drapery and the Market Square. Royal Mail are promoting pedestrian route improvements to the north of the town centre as part of their application for a foodstore at Barrack Road. Policy 7 should reference the need for development to have strong connections to the Royal Mail Sorting Office.

Policy references the connections to destinations within the immediate vicinity of the bus interchange site. The Royal Mail site is a significant distance away from the proposed bus interchange site, and lies outside the town centre boundary. Whilst the Council recognises the importance of strengthening links between public transport hubs and developments sites having an exhaustive list of all potential sites within a 10-15 minute
<table>
<thead>
<tr>
<th>Petition in strong objection to the demolition of the former Northampton Fish Market building on Bradshaw Street, Northampton for the purpose of provision for a new bus interchange. 105 signatures and comments raising the following issues:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Damage to the town’s heritage due to the demolition of the Fishmarket;</td>
</tr>
<tr>
<td>• Loss of a leisure destination in the town centre;</td>
</tr>
<tr>
<td>• A new bus station is not needed</td>
</tr>
<tr>
<td>• The proposed bus station is too small</td>
</tr>
<tr>
<td>• Waste of money</td>
</tr>
<tr>
<td>It is considered that Policy 7, when read in conjunction with Policy 1 (Delivering Design Excellence), provides sufficient reference to the importance of heritage assets and conservation areas. In addition, when developments come forward they will be subject to individual Heritage Assessments.</td>
</tr>
<tr>
<td>The Plan identifies various sites for the delivery of new leisure facilities. In addition, the Council in partnership with the County Council have successfully relocated the Arts Collective to a town centre site.</td>
</tr>
<tr>
<td>A new bus interchange is needed to allow for the expansion and regeneration of the Grosvenor Centre. In addition, the current bus station is an eyesore, attracts crime, and does not provide an efficient use of land. The age and condition of the structure has significant financial implication for the Council in terms of maintenance and management.</td>
</tr>
<tr>
<td>Throughout the site selection process the capacity of a new bus interchange has been a key consideration. The current bus station has an over supply of bays and is not subject to an efficient timetabling of movement. The site selection process shows that the Fishmarket site is capable of the catering for future demand. Any planning application will be required to demonstrate this fully. In addition, bus operators were involved in the site selection process and have been supportive of the Fishmarket site.</td>
</tr>
<tr>
<td>Public sector funding used to deliver the bus interchange will allow for further town centre regeneration to take place e.g. the Grosvenor Centre. This in turn will promote further investment in the town from retailers</td>
</tr>
</tbody>
</table>
and increase visitor numbers. The Council will also save a significant amount of financial resources in replacing an outdated facility which requires significant maintenance.

Concern relating to the reduced number of bays to provided as part of the bus interchange. In the future more people will be using the bus, thus more capacity will be required. The current bus station has an over supply of bays. Transport movements could be provided more effectively without raising the need for providing further capacity.

The site selection process shows that this site is capable of catering for further demand. Any planning application will be required to demonstrate this. Policy 8 also includes a reference to the design of the building to be flexible and future proofed in order to support any future expansion, as required.

4. SUSTAINABILITY APPRAISAL

Policy 7: Fishmarket Bus Interchange

4.1 Policy 7 will meet the following Sustainability Appraisal objectives:

- **SA7**: Crime and Community Safety
- **SA8**: Energy and Climate Factors
- **SA10** Labour Market and Economy
- **SA15**: Population
- **SA16**: Social Deprivation

4.2 In appraising Policy 7, the Sustainability Appraisal Addendum (Focused Changes) concluded that its implementation may have an overall slight negative impact. These negative indicators relate to the intensive use of land in a historically sensitive area. However, Policy 1 of the CAAP, Delivering Design Excellence, will help mitigate these effects and ensure the deliver of a well designed scheme which will preserve and enhance the setting of the Holy Sepulchre Conservation Area.

Northampton Central Area Action Plan Submission Version May 2012
5. POLICY DELIVERY

Policy 7: Fishmarket Bus Interchange

a) Funding

5.1 Key delivery and funding mechanisms are:

- Northampton Borough Council as landowners and planning authority;
- WNDC as funding partner;
- NCC as highway / transportation authority and funding partner in the planning and design phase; and
- First Bus, Stagecoach and other bus operators as users of the bus station facility.

b) Partnership

5.2 The above organisations are likely to have to work together on occasion either as a whole or more likely on individual elements of the delivery of the development site.

c) Timing

5.3 The planning application for the Bus Interchange was submitted in March 2012, with determination taking place by June 2012. Construction of the new bus interchange would take place between 2012 and 2013, with the new interchange opening in September 2013. The completion of this delivery programme would allow demolition of Greyfriars bus station to commence in Autumn 2013 and the redevelopment of the Grosvenor Centre taking being complete by 2017.

6. CONCLUSIONS

6.1 The delivery of a new bus interchange is vital in order to upgrade public transport facilities in the Central Area and help deliver other regeneration projects of regional importance, such as the Grosvenor Centre redevelopment.

6.2 An extensive evidence base covering a range of planning and transportation issues has been prepared and agreed by Northampton Borough Council, Northamptonshire County Council and the West Northamptonshire Development Corporation, to formulate a robust and deliverable CAAP policy.
6.3 In addition, all site selection work has been brought forward in full consultation with bus operators, bus user groups and other key stakeholders in the town centre.
POLICY 19: CASTLE STATION

1 INTRODUCTION

Context

1.1 This paper provides the background information to the Castle Station redevelopment site allocation in the Plan. The policy area encompasses the station building, car parks, the railway social club and the remnants of Northampton Castle (Scheduled Monument). All land is owned by Network Rail.

1.2 The station and surrounding land is in need of modernisation and regeneration for the following the reasons:

- The current 1960s station building provides limited user facilities and its exterior along with expansive areas of car parking fail to create a positive gateway to the Central Area; and

- The station and platforms have reached capacity during peak times, in 2012 the station is expected to reach capacity outright. The projected increase in Northampton’s population will increase the pressure on the facility in the coming years.

1.3 A new station facility will provide a wide range of passenger facilities, a significant amount of associated floorspace and new car parking. In addition, the opportunity arises to capitalise on its location, and maximise the potential of the area currently used for car parking. There is an opportunity to develop over the car park, providing both commercial and residential schemes, which allows occupants improved accessibility to public transport. Development on this site also offers the chance to showcase high quality and attractive developments. A high quality designed scheme with a mix of uses will create an attractive eastern gateway to the Central Area and capitalise on this strategically important location for town.

2 PLANNING POLICY CONTEXT

National Guidance

2.1 The NPPF March 2012 –addresses the need to positively plan for public transport infrastructure in Section 4 – Promoting Sustainable Transport and the need to accommodate economic growth in Sections 1 Building a strong, competitive economy and Ensuring the vitality of town centres. In section 12 it highlights the importance of seeking to preserve or enhance the historic environment.
Regional Policy

East Midlands Regional Plan (March 2009)

2.2 Policy MKSM SRS Northamptonshire 3 requires the preparation of a LDD to provide for a long term framework for revitalising and upgrading the quality and facilities of the Central Area, to include the improvements to the range and quality of retail provision and the development of the railway station area as a transport hub and gateway. It requires the Central Area to become the focus for a range of employment opportunities.

2.3 This policy will contribute significantly to the delivery of the Regional Plan.

Strategic Policy

Pre-submission draft West Northamptonshire Joint Core Strategy (WNJCS) (February 2011)

2.4 The Joint Core Strategy sees Northampton as the principal urban area which will, amongst others:

- Successfully blend its distinctive historic character with innovative new development both of which will enhance its riverside setting
- Be repositioned as the key economic driver at the cultural heart of Northamptonshire
- Enhance its role as the leading retail, entertainment, employment, health and learning centre, based upon a thriving mixed economy and the services it offers with continuing pride in its theatres, museums and professional sports teams

Northampton Corporate Plan (2012 – 2015)

2.5 The strategic policy on Castle Station will contribute towards the following priorities contained in the Corporate Plan:

Priority 1: Northampton on track – an economically prosperous, successful and vibrant Town; the Town is nationally recognised as an economic hub and a place to do business; increased job opportunities and an improvement in the quality of jobs available; delivery with partners of major town centre regeneration projects, such as the re-design of the railway station; the promotion and preservation of the Town’s history, heritage and culture

3. KEY EVIDENCE BASE AND POLICY FORMULATION

3.1 The following technical studies have been used to inform and formulate all the Castle Station policies.
3.2 Castle Station’s character area is defined by Castle Station, a major transport hub for Northampton. According to the study, the boundary along the east, St Andrew’s Road, is now firmly established, to the detriment of how the area connects with the heart of Northampton. It adds that the remnants of Northampton’s castle remain in the south east corner of the character area and are provided through designation as a Scheduled Monument. The study recommends the following for the site:

- development needs to create a sense of arrival for this gateway site, in particular from the strategic views it has the opportunity for a way marking structure to increase awareness and visibility of the station’s location,
- new development should seek to promote a high intensity use of the site and investigate the opportunity to build a tall building,
- promote connections with surrounding areas; and
- not forget the past through thorough research and positively addressing the history of the area including the Scheduled Monument to create identity.

Castle Station masterplan Options Report (BDP, December 2010)

3.3 The report was prepared to update the GRIP3 (Governance for Railway Investment Projects) masterplan proposals for the area immediately adjacent to Northampton Station. This masterplan proposal was based on a combination of residential and office based development projects. It outlines 3 options from which these land uses can be accommodated on site.

3.4 The report retains the proposal to deliver both housing and office schemes on the station car park site. Although mentioned within the policy supporting text, the pre-submission version of the Central Area Action Plan omitted the inclusion of housing in the policy in error. Policy 19 of the Submission Central Area Action Plan will address this omission.

West Northamptonshire Employment Land Study (WNELS)(Roger Tym & Partners, May 2010)

3.5 This study identifies the Castle Station site as one of the key sites for new office development of providing up to 26,000 sq.m of floorspace. This is incorporated into Policy 19. This allocation is also included in Policy 15: Office and Business Use, which is the subject of a separate technical paper.

Castle Station Development Framework (BDP – March 2009)

3.6 The work was commissioned by West Northamptonshire and Network Rail to assist with the GRIP3 stage. The Masterplan looked to take further forward the principal themes for the sites identified within the Northampton
Central Area Design, Development and Movement Framework November 2006. It provides a much finer grain of detail on the proposed uses for the site taking account of the constraints and opportunities that the sites presented.

3.7 This framework identified the opportunity for a new ‘iconic’ station building of 2,220 sq m that creates sufficient capacity to meet long term passenger patronage growth. A 1200 space multi-storey car park frees up the site for approximately 200 apartments and 26,000 sq m of commercial development, primarily offices with a complementary element of retailing, restaurants, cafés and bars. These additional uses will be provided through land that is made available through the replacement of surface level with multi-storey car parking. Policy 19 takes account of the key requirements outlined in this study through the promotion of a large office floorspace with ancillary retail and leisure provisions.

Central Area, Design and Development Framework (& associated documents) (BDP & CBRE November 2006)

3.8 The strategic objectives concentrated on improving the public transport infrastructure in Northampton, enhancing a key gateway to the town, creating a major business address to underpin employment and business growth and regenerating the adjacent relatively deprived areas of St James and Spring Boroughs. The design principles for the area were based on creation of a landmark, gateway building containing a transport interchange, allowing easier bus access to serve the station and linkages to the town centre via Marefair / Gold Street and through Spring Boroughs.

3.9 Policy 19 therefore seeks to redevelop the station building and concourse to reflect its role as a principal gateway to Northampton. The policy also seeks the provision of improved interchange facilities to encourage substantially increased use of buses, taxis and cycles to and from the site.

3.10 In addition to the built development discussed earlier, Policy 19 also seeks a development that positively addresses the historic importance of the site as a castle and in particular the archaeological remains on site, the Scheduled Monument and the listed Postern Gate.

4. PUBLIC CONSULTATION

4.1 The Council embarked on a series of public consultation exercises, which relate to the milestones of the plan preparation process. Each stage of the consultation process provided an opportunity to engage with consultees both in terms of the plan itself and also to assist in policy formulation. Below are the key outcomes from the various stages of the consultation process leading to Submission.

a. Issues and Options (September – November 2007)

4.1 Feedback from this consultation event can be summarised as follows.
4.2 The site was identified as an important gateway, which needed to be positively addressed. It was identified as the most appropriate for a hotel, with large and small scale offices, retail with more intensive development to reflect its proximity to a major public transport link. Although a transport interchange found favour with some, there was marginally less support than for its inclusion at Greyfriars. Improved public transport through a fast shuttle service to the town centre was supported. The need to address the historic importance of the site was highlighted, as was the need to ensure that its regeneration would positively address Spring Boroughs.

b. Emerging Strategy Consultation (August/September 2009)

4.3 Support for upgrading the railway station. There was concern about the potential impact of tall buildings on the archaeology of the area and the need for greater recognition of the archaeology of the area, in particular improving the setting of the castle mound and Postern Gate.

c. Pre-submission draft Consultation (November / December 2010)

4.4 There were no objections to the proposal. Rather, there were minor concerns about the historical and green infrastructure elements of the site and the impacts of the proposal. There were also concerns on the impacts on the proposal on the services, and the Council’s response is that any proposed redevelopment needs to be mindful of the requirements of existing and emerging services. Fuller responses to representations made are included in Figure 4 at the end of this section of the Technical Paper.

5. SUSTAINABILITY APPRAISAL

5.1 The Sustainability Appraisal concluded that Policy 19 will have no significant negative or minor negative impacts. It will have significant positive impacts in relation to air quality, noise, archaeology, cultural heritage, employment, landscape / townscape and material assets. Minor positive impacts are predicted in relation to biodiversity, crime and community safety, energy and climate, health and well being, population, soil geology, land use, waste and water.

6. DELIVERY

6.1 West Northamptonshire Development Corporation, Northampton Borough Council, Northamptonshire County Council and Northampton Enterprise Limited have been working with Network Rail, London Midland and the Department of Transport in taking forward the upgrade of the station. This work has gone through a number of iterations over the last five years. The work is going through Network Rail’s eight stage ‘Governance for Railway Investment Projects’ (GRIP) project assessment framework.

6.2 The GRIP 4 stage (single option development) is now complete. This is a significant milestone which confirms that the new station and its associated car parking provision, as designed, can be delivered.
6.3 The West Northamptonshire Development Corporation and partners are actively promoting the scheme and reviewing a variety of funding sources, following an unsuccessful bid for Regional Growth Fund.

**Partnership**

6.4 Castle Station is identified as a priority project by Northampton Borough Council, Northamptonshire County Council, Northampton Enterprise Partnership and the West Northamptonshire Development Corporation.

**Timescale**

6.5 This is highly dependent on public funding, of which a significant proportion has still to be committed:

- GRIP 5 ‘Detailed Design’ will be completed by June 2013
- GRIP 6 ‘Construction’ Starts October 2013 with completion in June 2015

6.6 There was also a requirement for Network Rail to obtain “prior approval” Northampton Borough Council for the new station design under Permitted Development powers. This was granted in May 2011.

6.7 The Infrastructure Delivery Technical Paper provides further context to these phasing and delivery of this key project.

7. **CONCLUSIONS**

7.1 Policy 19 seeks to redevelop Castle Station, as a short term objective, deliverable within the first phase of the CAAP, will create a modern facility fit for the 21\textsuperscript{st} century and capable of meeting the needs of future rail users. The redevelopment of underused land will also maximise the site's potential in delivering sustainable commercial and housing developments and reducing the need to use cars.

7.2 In addition, it will positively assist with the regeneration of Spring Boroughs. Creating and emphasising easy pedestrian access between the two sites and to the Primary Shopping Area (see Retail part of the Technical Paper for further information) will substantially increase the delivery of the vision and aims for Spring Boroughs.

7.3 The railway sidings (to the north of the allocated site) and station platforms are highly visible from the open spaces to the west and currently do not present a visually pleasant aspect. Policy 19 provides the opportunity for environmental improvements to the Brampton Branch to screen some of the station and improve the bio-diversity of the river corridor.
## Figure 4: Summary of key responses to the pre-submission draft consultation (November 2010)

<table>
<thead>
<tr>
<th>Consultee responses</th>
<th>NBC responses</th>
<th>Policy Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference to Castle Station should be changed to Northampton Railway Station</td>
<td>Castle Station is the name that is locally assigned reflecting the fact that Northampton previously had more than 1 station. Whilst Northampton Railway Station is factually correct, Castle Station is the term most people in Northampton would use</td>
<td>No change</td>
</tr>
<tr>
<td>Any development here should explore the archaeology of the site and take the opportunity to used stored stones from the former castle to create a memory of the footprint of the former castle</td>
<td>Policy 19 criterion 7 provides sufficient policy direction to ensure that a suitable form of interpretation of the Castle is delivered in association with the redevelopment of the site. The suggestion forwarded is a detailed matter relating to the future interpretation of the remains</td>
<td>No change</td>
</tr>
<tr>
<td>Development should incorporate existing and new green open space running southwards from Millers Meadow along the Waterside and St Andrew Road to link with the Castle Mound and adjacent listed building in Chalk Lane through to Postern Gate and St Peter’s Church adjoining St Peter’s green down to Foot Meadow</td>
<td>The design and development principles contained in figure 6.3 makes provision for the development of green infrastructure from Miller’s Meadow to Foot Meadow, as well as green links from the Station through to Spring Boroughs and into the town centre. Policy 4 sets the policy direction for Green Infrastructure which the redevelopment proposals will need to take into account at planning application stage</td>
<td>No change</td>
</tr>
<tr>
<td>Any development should</td>
<td>This policy provides the</td>
<td>No change</td>
</tr>
<tr>
<td>Not compromise the ability of the station to accommodate new services to the north west, north Wales and a number of other long distance destinations</td>
<td>Policy direction for the development of a new station building that will provide appropriate facilities for the identified patronage to 2026. Any such development will be mindful of the opportunities that could be presented by the delivery of the High Speed 2 proposal, or alternative schemes that open up capacity along the West Coast Main Line</td>
<td></td>
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<tr>
<td>---</td>
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<td></td>
</tr>
<tr>
<td>Anglian Water sought confirmation that surface water connection will be subject to their policy at the time of the planning application and that the relevant recommendations contained in the most current Water Cycle Study be taken into account</td>
<td>These comments were noted.</td>
<td></td>
</tr>
<tr>
<td>Support given to the reference to historic interests at this site. Recommended a minor amendment to the wording of the policy: include in Bullet Point 7..... ‘the Scheduled Monument and Listed Postern Gate and the setting of these heritage assets and St Peter's Church and other Listed Buildings in Marefair’. There should also be an additional line of text that refers to the heritage asset on the site and the need for appropriate archaeological assessment prior to development.</td>
<td>The Council accepts the need to change the reference from Scheduled Ancient Monument to Scheduled Monument. The impact on setting of other historic assets in the area will be dealt with through Policy 1. Given the likely archaeology on site the reference to undertaking an appropriate archaeological assessment prior to development is considered appropriate. Para 6.4.4 will be amended accordingly prior to Submission</td>
<td></td>
</tr>
</tbody>
</table>

Northampton Central Area Action Plan Submission Version May 2012
1. INTRODUCTION

Context

1.1 These three sites form a substantial regeneration area within the Central Area. Both St John’s and Angel Street sites are separated from the Bridge Street site by the Plough Junction and Victoria Promenade. These sites are considered comprehensively because they are predominantly owned by Northamptonshire County Council and Northampton Borough Council. Both NCC and NBC have identified clear objectives for these sites.

St John’s

1.2 St John’s is owned by Northampton Borough Council and is currently used as surface level car parking, both at St John’s and Albion Place. The site boundary also includes the Derngate Theatre and the site formerly occupied by Blueberry Diner.

Angel Street

1.3 Angel Street is primarily owned by Northamptonshire County Council, incorporating their main town centre offices and a large cleared area of land that is used primarily for parking purposes. The Borough Council also owns a number of buildings on the Fetter Street frontage.

1.4 Other buildings towards the south of the Angel Street area are in private ownership, although there are comparatively few owners as the properties are relatively large. In the southern part of the Angel Street area is a gyratory road system, a product of 1970s highways interventions that has created a fragmented and unattractive piece of townscape, with limited benefits for the transportation network.

Bridge Street

1.5 This area of Bridge Street comprises a mixture of primarily low intensity, low grade industrial uses and restaurants, with a greater range of owners. These units provide local services and local employment to the area and are not therefore considered for regeneration until the latter part of the plan period.

In addition, both the St John’s and Angel Street sites are located in part within Conservation Areas. This means that any regeneration proposals need to
take into account through their preservation and where possible, enhancement of the character, appearance and setting. Also, both Angel Street and Bridge Street are located in Flood Zones 2 and 3 respectively.

1.6 The regeneration area has not, to date, been used to its full potential. Parts of the area are derelict, and together with empty buildings and large areas of surface level car parking, they create a poor physical environment which is associated with a negative impression of the Central Area from the southern approaches. The regeneration and redevelopment of these sites will therefore contribute towards the vision and objectives for the Central Area.

Policy Aims

1.7 The large amount of land and property ownerships of the Borough and County Councils within the area means that these two organisations have the capability and an obligation to bring about substantial positive change. The area is one that has more recently been assessed in some detail through a master planning process commissioned by both organisations. This seeks to pursue a vision to capitalise on the proximity to the theatre and museums to strengthen the cultural offer of the town, whilst using the existing historic fine grain of townscape to create an environment that is well suited to niche retailers, business and cultural uses. The area also provides an opportunity for the County Council to consolidate much of its currently dispersed office based functions onto one site in the centre of town. Funding has been spent from East Midlands Development Agency within the last six years on St John’s in clearing some buildings to enable redevelopment to occur.

1.8 The policies therefore seek to provide a clear direction for developers in terms of the developments which the Council would want to see on site, and associated public realms and ancillary requirements.

2. POLICY CONTEXT

National Policy

2.1 Substantial parts of the NPPF are relevant to and provide a positive planning context for the future regeneration of this site including Section 1 ‘Building a strong, competitively economy’; section 2 ‘Ensuring the vitality of town centres’; section 4 ‘Promoting Sustainable Transport’; Section 5 ‘Delivering a wide choice of high quality homes’; Section 7 ‘Requiring good design’; section 10 ‘Meeting the challenge of climate change, flooding and coastal change’ and In section 12 ‘Conserving and enhancing the historic environment’.

Regional Policy

East Midlands Regional Plan (March 2009)

2.2 Policy MKSM SRS Northamptonshire 3 requires the preparation of a Local Development Document to provide for a long term framework for
revitalising and upgrading the quality and facilities of the Central Area, to include the need to make the Central Area the focus of a range of employment opportunities with a particular emphasis on offices, through the provision of large scale office spaces through to small office suites in both new and converted accommodation. It also seeks an enhancement to the existing cultural heritage facilities and attractions.

2.3 These strategic sites policies will contribute significantly to the delivery of the Regional Plan.

**Strategic Policy**

*Pre-submission draft West Northamptonshire Joint Core Strategy (WNJCS) (February 2011)*

2.4 The Joint Core Strategy sees Northampton as the principal urban area which will, amongst others, be repositioned as the key economic driver at the cultural heart of Northamptonshire and is based upon a thriving mixed economy and the services it offers with continuing pride in its theatres and museums.

*Northampton Corporate Plan (2012 – 2015)*

2.5 The strategic policies on St John’s, Angel Street and Bridge Street will contribute towards the following priorities and outcomes:

- **Priority 1:** Northampton on track – an economically prosperous, successful and vibrant Town; the Town is nationally recognised as an economic hub and a place to do business; increased number of visitors; increased job opportunities and an improvement in the quality of jobs available; the promotion and preservation is the Town’s history, heritage and culture
- **Priority 7:** Promoting health and well being – improved public health

**3. KEY EVIDENCE BASE AND POLICY FORMULATION**

3.1 The following technical studies have been used to inform and formulate all the policies associated with St John’s, Angel Street and Bridge Street. These studies are presented in chronological order.

*Tall Buildings and Characterisation Study for Northampton Central Area (Space June 2010)*

3.2 The study identifies that proposals for the development of a mix-used quarter for St Johns based around arts, culture and employment should adopt a sensitive approach to design by respecting the surrounding historic townscape. This includes enhancing views of All Saints’ Church to the north and wider views of Northampton’s historic skyline. The design of a new quarter should incorporate a new activity area for the Central Area by creating
a well defined public open space. Proposals for new development should also look to improve the north-south permeability through the character area and provide strong frontage onto St Peters Way.

3.3 The above evidence base points towards regenerating St John’s and Angel Street for mixed use incorporating town centre uses such as offices and leisure, which the CAAP policies intend to do. Its central location, in the edge of the Primary Shopping Area (and the proposed extension) make this area ideal for commercial and leisure, and to encourage an increased contribution to the day time and night time economy.

3.4 The Bridge Street area is allocated for similar uses, but for the latter plan period because evidence shows that the existing facilities should be retained to facilitate local employment and services.

3.5 Also, since these sites straddle and/or accommodates some of the Conservation Areas and listed buildings, the opportunity exists for them to be regenerated in a manner which would enhance these assets, in line with the principles outlined in Policy 1.

**West Northamptonshire Employment Land Study (WNELS)(Roger Tym & Partners, May 2010)**

3.6 The study identifies the St John’s / Angel Street / Bridge Street sites as desirable sites for employment use.

3.7 In conjunction with the requirements set out in national policies, the Central Area Action Plan promotes Northampton town centre (as defined on the Proposals Map) as the preferred location for all new retail, office, cultural and leisure developments and by allocating strategic sites for major office developments.

**Northampton Strategic Floor Risk Assessment Level 2 (Scott Wilson, March 2010)**

3.8 The Bridge Street area is partly a Zone 3 flood zone and wholly within Zone 2. However it does benefit from flood defences that give it a level of protection up to a 1:200 or 0.5% probability flood event. The Level 2 Northampton Strategic Flood Risk Assessment has undertaken some breach analysis and this identifies that there would be a danger to some on the Bridge Street site if a breach to the defences occurred. This issue is addressed more fully within Policy 5: Flood Risk and Drainage technical paper, but the risk does need to be reflected in the development proposals for the site.

**St John’s Masterplan (Taylor Young / Lambert Smith Hampton - February 2008)**

3.9 The Masterplan was commissioned by Northampton Borough Council, West Northamptonshire Development Corporation and Northamptonshire
County Council. The Masterplan looked to take further forward the principal themes for the sites identified within the Northampton Central Area Design, Development and Movement Framework November 2006. It went into a much finer grain of detail on the proposed uses for the site taking account of the constraints and opportunities that the sites presented. The overall vision was:

3.10 “By 2020 St John’s is a prosperous quarter of the town centre focussed on the Derngate and Angel Street squares, with theatres, museums, art, high value innovation workspace, niche retail, commercial offices and quality restaurants. There is a new hotel and there are new private residences bringing back life into the town. A major new suite of office buildings provides a customer friendly centre for Northampton’s public services with the 3000 occupants injecting economic demand into the town. The whole area creates a welcoming bridge between the town centre and the regenerated riverside with attractive well managed public spaces.”

3.11 These CAAP policies require the delivery of these developments together with public squares which will improve the attractiveness and integration of the townscape.

**Central Area, Design and Development Framework (& associated documents) (BDP & CBRE November 2006)**

3.12 The document sought to create a series of destinations in the town centre to act as flagship schemes for the key town centre sectors. Building on the artistic and cultural attractions within the area, such as the Derngate and Royal Theatres and the Northampton Museum and art gallery; an arts, crafts and culture quarter was identified for the area around Angel Street and Derngate. It supports the development of a specialist area of shopping crafts and ancillary restaurants and bars to become the creative quarter of the town. A significant proportion of the goods and businesses would be developed by local entrepreneurs including graduates of the college and University. The overall feel would be of tight, historic streets and intimate spaces, small premises and a vibrant mix of uses.

3.13 The design principles for the area were based on the sensitive adaptation of historic buildings and high quality design of contemporary infill buildings and new developments. The area would include the incorporation of small, intimate squares and spaces on routes through the area and new links for the wider town centre. The scale and massing of the development would reflect the historic context.

**4. PUBLIC CONSULTATION**

4.1 The Council embarked on a series of public consultation exercises, which relate to the milestones of the plan preparation process. Each stage of the consultation process provided an opportunity to engage with consultees both in terms of the plan itself and also to assist in policy formulation. Below
are the key outcomes from the various stages of the consultation process leading up to Submission.

a. **Issues and Options (September – November 2007)**

4.2 Feedback from this consultation event can be summarised as follows:

4.3 Small scale office, niche retailing, the cultural quarter, leisure, entertainment, cultural, residential and hotel development, with public open spaces being the most popular. Large scale office and retail was not viewed so positively. The severance caused by the road system around the Grade 1 listed former St John’s Church was highlighted as a negative issue in the area that needed to be addressed, as well as generally improving the setting of this building. The need for the area to be a link between the town centre and the Avon development area where also highlighted. St John’s provided opportunity for leisure uses not currently well catered for e.g. young people in the daytime and older people in the evenings. The opportunity to enhance the Derngate conservation area was also highlighted.

b. **Emerging Strategy Consultation (August/September 2009)**

4.4 The appropriateness of creative industries at St John’s was focussed on by the consultation document. Respondents were generally very supportive of this area, what concern there was centred on the robustness of the graduate business incubator units.

4.5 Within the Vision and strategic objective 3, St John’s was identified for arts, culture, alongside a base for public services and employment. With regards to strategic objective 3 the response was one of overwhelming support, with a minor issue being that this should not dismiss other complementary uses, e.g. residential. There was also support for leisure, restaurants and cafés, the Police thought careful consideration needed to be made of the uses promoted for the evening economy.

4.6 Removal of the gyratory at St John’s was supported. English Heritage identified that the northern half of the St John’s area includes a large number of listed buildings including Grade I and II and therefore, the new office development will need to respect the context of these buildings. Others responded that the historic context needed to be taken into account when assessing development proposals. The gateway at Bridge Street was seen as being appropriate for residential development of four storeys or more.

c. **Pre-submission draft Consultation (November/December 2010)**

4.7 The main concern expressed by consultees relate to the potential increase in traffic resulting from the proposed developments. The policy response refers to the other transport proposals, including junction improvements, which will not only manage traffic better but also increase provisions for walking and cycling. English Heritage offered support for Policy 21 although recommendations were given for some minor amendments,
which have been taken on board for Submission. Anglian Water sought assurance on the use of the most up to date Water Cycle Study and their latest policy at planning application stage. Fuller representations and responses are set out in Figure 5 at the end of this section of the technical paper.

5. **SUSTAINABILITY APPRAISAL**

5.1 The Sustainability Appraisal (October 2010) concluded:

- Policy 20 is predicted to have a significant negative impact in relation to air quality and noise, as it is likely to have an adverse impact on the Air Quality Management Area in the vicinity of the St John’s Church.

- Policy 20 is predicted to have significant positive impacts in relation to employment, landscape / townscape, material assets and population. Minor positive impacts are predicted in relation to social deprivation, archaeology, cultural heritage, crime and community safety, energy and climate, health and well being, soil geology, land use, waste and water.

- It was recommended that Policy 20 should include measures to limit traffic volume and to include reference to protecting the fabric and design of designated and undesignated archaeological and cultural heritage assets. However, this was not considered necessary because the traffic generation issue will be addressed through control of parking provision as set out in Policy 10 and will be considered in further detail as the project progresses and the latter issue is addressed in Policy 1.

- Policy 21 will not have any significant negative or minor negative impacts.

- Policy 21 is predicted to have significant positive impacts in relation to social deprivation, archaeology, cultural heritage, employment, landscape / townscape, material assets and population. Minor positive impacts are predicted in relation to biodiversity, crime and community safety, energy and climate, health and well being, soil geology, land use, waste and water.

- Policy 21 will have an uncertain effect on air quality and noise because no evidence is presented (through traffic modelling for example) that the measures 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.

- Mitigation measure for Policy 21 include requirement for traffic calming measures in the vicinity of the proposed Angel Street redevelopment. The mitigation measure recommended is noted. It is not considered
necessary to include this in the CAAP as it will form part of the highway consideration when the project is progressed – acceptable principles are set out in the Public Realm Implementation Framework.

- Policy 22 will not have any significant negative or minor negative impacts.

- Policy 22 is predicted to have significant positive impacts in relation to employment, material assets and population. Minor positive impacts are predicted in relation to archaeology, cultural heritage, biodiversity, crime and community safety, energy and climate, health and well being, landscape / townscape, soil geology, land use, waste and water.

- Policy 22 will have an uncertain effect on air quality and noise because no evidence is presented (through traffic modelling for example) that the measures 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.

- Enhancement measures for Policy 22 include making specific reference to preservation of the setting of the listed buildings and other historic sites within the centre. These have been considered but are not regarded as appropriate for inclusion in the policy as they are addressed by Policy 1.

6. DELIVERY FRAMEWORK

Funding

6.1 The County Council and Borough Council as significant landowners and potential occupants of the sites will have a substantial input into the funding of the development of the sites, particularly given the current difficult economic circumstances. Commitments from other sectors and agencies are required to ensure that the policies in the CAAP are delivered.

6.2 Key delivery and funding mechanisms are:

- West Northamptonshire Development Corporation and Growth Area funds (and its successors)
- Northampton Borough Council and Northamptonshire County Council as landowners and potential investors
- Northamptonshire County Council as Highway Authority
- East Midlands Development Agency and its successors
- Northamptonshire Enterprise Partnership / South East Midlands Local Enterprise Partnership
- Private public sector partnership
- Private sector commercial enterprises
Partnership

6.3 The St John’s and Angel Street sites are identified as priority projects by Northampton Borough Council, Northamptonshire County Council and the West Northamptonshire Development Corporation.

Timing

St Johns

6.4 Development proposals for this site are being progressed by the Borough Council through the following works:

- A full planning application was approved in April 2012 for the development of student accommodation for the University of Northampton
- Ongoing discussions with a hotel operator for the delivery of a hotel on site

Angel Street

6.5 Depending on the site being identified as the preferred location for the County Council’s consolidated office function, a full application is expected to be submitted sometime in late 2012. At the moment all the technical work to support the planning application, in particular assessment of the heritage assets is being progressed. A decision on the commitment to deliver this project will be made by Northamptonshire County Council in 2012.

6.6 By way of background context, the County Council are progressing with an assessment of their accommodation needs and the viability of a move to the town centre as part of the move for delivering the project in Angel Street (known as Project Angel). Initial indications are that this could create a requirement of up to 30,000 sq m of additional floorspace for up to 3,000 employees, with the opportunity for a consolidation of other services on site for example the library in a move towards a ‘civic hub’ model of service provision.

Bridge Street

6.7 In terms of public funding, given limited public finances and the priority of other projects, this site is unlikely to gain substantial public funding to bring about change until after 2021. The sites within Bridge Street can continue to be used for local employment purposes, and provide services for the local population.

7. CONCLUSION

7.1 Policies to regenerate St John’s, Angel Street and Bridge Street will contribute towards a much needed increase in commercial and leisure
premises in the Central Area. These should direct developers towards an appropriate range of mixed use developments and public realm whilst respecting the heritage assets within the area. Significant reductions in public funding and changes in economic circumstances after completion of the masterplan and the early stages of CAAP consultation have undoubtedly had an impact on the mix of uses that is viable. If development is to proceed in the short to medium term it will require a stronger commercial focus than was originally intended, particularly on the St John’s and Angel Street sites. It is against this background that the Council has taken a pragmatic view and continued to pursue taking forward opportunities for development that exist currently.

**Figure: Consultation responses to the Pre-Submission Draft CAAP (November 2010)**

<table>
<thead>
<tr>
<th>Consultee responses</th>
<th>NBC response</th>
<th>Status of Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is going to be increased traffic congestion in the Victoria Promenade, Derngate, St Giles Street, Guildhall Road, Bridge Street area, with the increased amount of cars arising from the increased amount of housing and residents.</td>
<td>The modelling of the town centre shows that there will be increased traffic generated both from development within the town centre and outside. Whilst there might be some additional congestion, this would also be likely to occur if development was alternatively placed on the edge of Northampton. It is more sustainable to regenerate / reuse brownfield land and because of the proximity of facilities and good public transport, it will reduce the need to travel in by car and in the distance that people will have to travel.</td>
<td>No change</td>
</tr>
<tr>
<td>The proposal to build extra public houses in this area is going to contribute to increase drinking-related anti-social behaviour that is already significant on a Friday and Saturday night.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reference should be made to creating an active front on the west of the street by developing a visitor attraction at Carlsberg Brewery.</td>
<td>This is something that can be explored with Carlsberg. The Council would be supportive of such a proposition from the brewery and it is considered that it would fit with the aspirations from Policy 22. However, it is not considered that it is appropriate to include this as a requirement of the development.</td>
<td>No change</td>
</tr>
<tr>
<td>Student and living accommodation increases in this area is unbelievable. The area is already densely</td>
<td>Provision of purpose built student accommodation in the Central Area will be positive for its vitality and viability and also</td>
<td>No change</td>
</tr>
</tbody>
</table>

Northampton Central Area Action Plan Submission Version May 2012
populated with buildings. Extra traffic congestion is going to result from students travelling to and from the University of Northampton Moulton Park campus, which is several miles away. It's interesting to see how students will afford this town centre accommodation. 

| The increase in housing is going to contribute to an increase in traffic congestion around the Bridge Street, Gold Street, The Drapery, St Johns, Angel Street area, with residents coming and going in their cars. Interestingly, with the amount of public car parking spaces not being increased, where are the extra residents of St Johns, Angel Street and Bridge Street, going to park their cars? Is there an intention to ban these residents from parking their cars near their homes? | The modelling of the town centre shows that there will be increased traffic generated both from development within the town centre and outside. As is currently the case, in the future, on street parking is likely to not meet demand from residents. There is likely to be some car parking provided in association with new development. There will be the opportunity for developers to provide car parking within the public car parks, or for residents to purchase their own permits. | No change |

| Surface water connection will be subject to Anglian Water's policy at the time of the planning application and any | Noted. | No change |
arrangements will be site specific. The relevant recommendations contained in the most current Water Cycle Study will be taken into account.

| Policy 22 Bridge Street: Proposed residential element of development may not be appropriate close to existing brewery operation | It is acknowledged that the 24 hour operation of Carlsberg, with its associated vehicular movements both within the brewery and on the highway network adjacent as a major employer in the Central Area, needs to be properly assessed when development is taken forward particularly on the Bridge Street frontage. | No change |

| English Heritage support the principle of the reuse with mixed uses as set out in policy, subject to appropriate assessment of the impact of proposals on the significance of the heritage assets. English Heritage also support the remodelling of the Plough gyratory. | Bullet point 1: no change - addressed in policy 2 and 3. Bullet point 3: no change - reference to the existing County Hall offices is considered sufficient Bullet point 5: Covered by national policy and policy 2. Bullet point 6: Policies elsewhere in CAAP mean that the Fish Market cannot be regarded as a long term venue for its existing use as a gallery. Bullet point 7: This is agreed. The St John's masterplan contained what could be considered relatively crude blocks for the Angel Street site in terms of their height, form and massing - which is why there was the number of storeys was outlined as 5 in the policy. However, if Policy 2 and 3 is used well, there is no need for the policy to prescribe the number of storeys the development should be. | Amend policy 21 Bullet Point 7 to: Be sympathetic to the change in topography of the site and its setting in terms of its form and height and in particular not impact on the strategic views of All Saints from the south and north |

Recommended text changes
- Bullet point 1 - reference the need to carry out an impact assessment on heritage assets in the area - this includes a key views assessment for All Saints Church. Bullet point 3 - reference in the area bounded by George Row, Guildhall Road and Angel Street. Bullet point 5 - a new pedestrian link should not harm the significance of listed buildings fronting onto George Row. Bullet point 6 - omit reference to Fishmarket Gallery Bullet point 7 - New buildings should respond to the topography of the site in terms of height and form and respect the context of historic
buildings within the Conservation Area; it should also protect strategic views of All Saints from the south and north.

The desire to cluster the night time economy activities close to the theatres is understood. Provided it is restaurants and cafes as opposed to bars and clubs then this would seem reasonably appropriate. However, care must be taken not to create a further area of night time activity away from the Leisure Zone which could be difficult to police.

<table>
<thead>
<tr>
<th>The respondents concern is appreciated however, the policy is couched so as to create an area of mixed use rather than a concentration of bars / clubs found in the Leisure Zone.</th>
</tr>
</thead>
<tbody>
<tr>
<td>No change</td>
</tr>
</tbody>
</table>
POLICY 24: SPRING BOROUGHS

1. Introduction

Context

1.1 This part of the Technical Paper sets out the detail that supports the development proposals set out within the Submission Central Area Action Plan Policy 24 Spring Boroughs.

1.2 Spring Boroughs is identified within the Central Area Action Plan (CAAP) as a Development Site. These sites are set to under-go major change because of the interventions planned. However, unlike some of the development sites, such as Castle Station, Spring Boroughs will be predominantly community led. This presents different challenges in terms of achieving the over-all vision and objective as well as seeking to meet the needs and aspirations of current and future residents. The part of the technical paper therefore places additional emphasis on the justification for the regeneration of the area, the community and social aspects of the policy in addition to the assets and “Landlord” functions of the Council. It should be noted that the framework of the policy is intended to guide future community engagement and involvement in order to produce a document that will guide delivery of future development and regeneration aspirations to add further detail to the CAAP policy.

1.3 The regeneration of Spring Boroughs is a council priority, both in terms of improving the environment and living conditions of its residents, but also to improve accessibility between the town centre (more specifically the currently weaker links to the area around the Grosvenor Centre) and Castle Station. These links have been identified in other supporting policies, including the pedestrian and cycling movement framework (Policy 10)

1.4 Spring Boroughs is a predominantly residential neighbourhood located wholly within Northampton’s Central area. It sits between the Grosvenor Centre and Northampton Castle Station.

1.5 The site is bounded by a number of major routes including Broad Street and Horse Market to the east, Grafton Street to the North, St Andrew's Road to the South and Marefair along the southernmost part of the site. These routes have been identified as causing isolation of the area, which is accessed either via crossing busy four-lane town centre through-routes or via subways. These issues are explored further within the justification of Policy 6: Inner Ring Road. The majority of the site is shown in Figure 1:
1.6 Spring Boroughs is historically significant. It is located on the site of a Saxon Castle (the Borough) and was the heart of the medieval town. The whole area was destroyed by fire in the 17th Century, with only a few buildings, such as Hazelrigg House on Gold Street surviving. A network of terraced streets and tenement buildings grew in the area supporting the town’s shoe trade throughout the 18th, 19th and early 20th century. Little evidence of the historical significance of the area remains above ground, although the whole of the area is considered high potential in terms of archaeology.

1.7 The area of Spring Boroughs has been subject to several “clearances” and redevelopment, both interwar and post-war. Fairly little remains of the Victorian and Edwardian development although there are notable exceptions, particularly Doddridge Church and other religious buildings.

1.8 During the post-war redevelopment, many of the original street patterns were abandoned. This has resulted in an area that is illegible and further re-enforces the pedestrian and cycle access issues between the
Grosvenor Centre and the Station. Furthermore, in order to address some of the anti-social behaviour that is present in the area, transport interventions such as blockades and fencing has been put in place.

Main Issues

1.9 Spring Boroughs is one of the most deprived areas within the country, falling within the top 5% (IMD). There are particular issues relating to health and wellbeing, education and unemployment. It is estimated that, on average, residents of Spring Boroughs will live shorter lives by approximately 7 years than those in some of the more affluent locations within Northampton Borough Council area. Furthermore, education levels are low. Despite this, Spring Lane School is presently over-subscribed and the school has been identified for expansion.

1.10 Spring Boroughs has been subject to a number of different interventions to tackle issues such as anti-social behaviour, education, crime, and the quality of the green spaces. Many of the interventions, such as fencing and the blocking of streets to prevent rat-running and curb crawling have left the area fragmented with many of the logical routes blocked for both pedestrians and vehicles.

1.11 The Housing Stock of high density low/medium rise flats is owned predominantly by Northampton Borough Council (over 83%) with two high-rise blocks managed by a RSL partner (Leicester Housing). One of the biggest issues facing the area is the state of repair and quality of the housing stock and sensitive, complex discussions will need to be held to determine the future management for the current housing stock. It is presently estimated that without intervention all of the council’s housing stock will fail the “decent homes” standard by 2015/16.

1.12 One of the principal issues associated with Spring Boroughs is the difficulty in accessing the town-centre, despite the close proximity. In particular, Horsemarket, which runs north-south between the town centre and the station, is a particular issue. It carries a significant number of vehicles and varies from 4-6 lanes, forming part of the inner ring road. The ring-road is specifically dealt with under the transportation policies, however some of the justification and benefits are included within this part of the technical paper, particularly where they directly impact on the area of Spring Boroughs.

1.13 Finally, despite the area being historically significant, much of this identity has been lost in previous redevelopments. The area has over 700 records on the Sites and Monuments record and is an area of high known and potential archaeology. Other than the Castle Mound, there is limited physical evidence of the area’s past. Regeneration of the area presents an opportunity to draw on some of the areas history and ensure that this is taken forward in the future.


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2. Policy Context

a. National Policy

2.1 There is little specific reference in the NPPF towards community regeneration, with the focus in paragraph 21 being identifying areas for economic regeneration. As with other areas of the central area, there are specific areas of the NPPF that are relevant: section 4 ‘Promoting Sustainable Transport’; Section 5 ‘Delivering a wide choice of high quality homes’; Section 7 ‘Requiring good design’ and In section 12 ‘Conserving and enhancing the historic environment’

Regional Policy

2.2 East Midlands Plan: contains the regional planning context for Northampton and the wider East Midlands. The plan set out the number of new homes to be delivered in and around Northampton, as well as other policy principles such as transport links, levels of employment, important habitats and climate change. It identifies Northampton Central Area as a priority area for investment and regeneration.

Strategic Policy

West Northamptonshire Joint Core Strategy Pre-Submission (JCS) (February 2011)

2.3 West Northamptonshire Pre-Submission Joint Core Strategy (JCS): provides the overall vision and policy framework for the whole of West Northamptonshire, which includes the town of Northampton. The Joint Core Strategy is the over-arching document and provides the context for the Central Area Action Plan and other area or topic specific Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). It specifies the requirements for community involvement and sets the criteria by which areas for regeneration can be identified.

2.4 The JCS contains a number of specific policies that set out the broad regeneration principles across the whole of West Northamptonshire. The Joint Core Strategy specifies that regeneration must seek to reverse economic, social and physical decline where market forces would not do this without intervention. The JCS contains a series of five principles that need to be incorporated into regeneration projects, these are:

- Embedding community engagement ensuring effective and inclusive mechanisms in decision making
- Ensuring a multi-disciplinary partnership approach to pooling assets and allocation resources. Focus on collective investment from agencies.
- Urban design codes and principles to ensure high quality safe, sustainable homes and communities through partnership working.
- Promoting mixed housing tenures
Promoting social and economic enterprise employment opportunities and lifelong learning.

2.5 Policy RC1 specifically requires regeneration schemes to take into account the key data sets that relate to the area including the IMD, Decent Homes Standards, Stock Condition, Safer Partnerships and Strategic Assessment Information.

2.6 Policy N11 specifically highlights Spring Boroughs as an area for community regeneration within Northampton. The policy specifies that the following criteria need to be met within a regeneration project:

- Integration between the community and the rest of the town
- Improving the public realm including public space
- Improving the quality of the public sector housing stock
- Creating safe and sustainable environments
- Addressing the existing deficiencies in the level and quality of recreation facilities
- Create facilities for employment and business development.

**Northampton Corporate Plan 2012 – 2015:**

2.7 The policy on Spring Boroughs will contribute towards achieving the following objectives:

- **Priority 1:** Northampton on track – an economically prosperous, successful and vibrant Town
- **Priority 2:** Invest in safer, cleaner neighbourhoods – a clean Town with neighbourhoods that are tidy and well maintained; a place where visitors and residents from all communities feel safe, secure and protected with low levels of crime
- **Priority 5:** Better homes for the future – local housing needs provided for; the Decent Homes standard met; vulnerable people supported with their housing needs
- **Priority 6:** Creating empowered communities – empowered local communities with a greater capacity to become involved in community life
- **Priority 7:** Promoting health and well being – improved public health

3. **Public Consultation**

**a. Issues and Options (September – November 2007)**

3.1 During the Issues and Options stage, the responses to the consultation focused around three key areas:

- The Provision of facilities and amenities within the area
- Access
- Environment
3.2 Facilities and Amenities: The responses noted that there was a lack of facilities in the area, particularly local retail and employment opportunities. The school was highlighted as requiring some intervention in terms of standard, yet other responses felt that it needed a larger site.

3.3 Access issues related principally to Horsemarket with various suggestions being made as to how to deal with the issues presented. The Subway access was perceived as dirty and dangerous, whilst the at-grade crossings were not seen as located optimally. Some of the suggestions to improve the access issues were bridges and tunnels for the traffic to open the area up.

3.4 Environment: many of these issues related to the amount of open space and general day-to-day issues of graffiti, low level anti-social behaviour and litter. There were some responses that highlighted the work on the pocket park and that this had encouraged wildlife into the area.

3.5 Other: There were a number of responses that were made in relation to the people who live within Spring Boroughs that related to the educational attainment levels, ethnicity and the way that the people who live there are perceived.

b. Emerging Strategy Consultation (August/September 2009)

3.6 The Emerging Strategy Central Area Action Plan focused on the type of intervention that could be provided, building on the broad set of issues and options identified at earlier stages of consultation. The majority of responses supported the “framework approach” set out within the CAAP, with the detail being provided through master plans or other documents. 100% of respondents also considered that Northampton Borough Council should work directly with the community of Spring Boroughs. Comments were received by a number of organizations, including the United Hill Reform Church and the Police who expressed an interest in being engaged in the regeneration of the area.

c. Pre-submission draft Consultation (November/December 2010)

There were few responses and those that were given were generally supportive. The police wanted to continue partnership working. The County Council highlighted the need to plan for expansion of Spring Lane Primary. The replacement of high rise older housing stock with town houses was seen as positive in terms of improving general health and well-being.

4. Sustainability Appraisal

4.1 The Sustainability Appraisal (October 2010) notes that the policy is likely to have a significant negative impact in relation to air-quality and noise as new residential development is proposed near the Grafton/Broad Street AQMA without any mitigation measures to improve environmental quality.
4.2 However, the Sustainability Appraisal also recognises likely positive impact including archaeology, cultural heritage, landscape/townscape, material assets and population. Minor positive impacts are predicted in relation to biodiversity, crime and community safety, energy and climate, social deprivation, soil geology, land use, waste and water.

4.3 The Sustainability Appraisal stated that “although a new primary school is proposed, there is no provision for enhancing facilities at the existing Spring Lane Primary School, which currently has a low achievement level”. It is envisaged that the new primary school facilities would replace existing providing a more positive learning environment. Furthermore, since the Sustainability Appraisal was drafted, there have been significant improvements to the attainment levels within the school.

4.4 The Sustainability Appraisal recommends making the following changes to the policy for Spring Boroughs:

- Inclusion of provision for enhancing air quality and noise environment given the pressure of the AQMA at the cross-roads (Regent’s Square) for example Junction Improvements and Traffic slowing measures
- Inclusion of provision for enhancing the facilities at Spring Lane School

5.5 It is not considered that these measures are necessary for the policy. Firstly, the issues relating to the Inner-Ring Road that create stationary traffic leading to poor air quality are addressed within Policy 6. This also proposes changes to Horsemarket including the potential slowing of traffic to create a better pedestrian environment. The policy as it stands relates to the existing Spring Lane school, whether this be an extension of the existing school premises, or alternative provision elsewhere in Spring Boroughs.

5. Evidence Base and Policy Formulation

5.1 The need for change within Spring Boroughs has been a long-term ambition with a history of strategies led by different agencies and parts of the community depending on the area in which interventions were undertaken. For example, the “Castle Crime and Anti-Social Behaviour Partnership and Neighbourhood Renewal Partnership” (CASPAR+ NR partnership) was tasked with tackling the high incidence of anti-social behaviour including drug dealing and prostitution. The Council’s Regeneration Team also led projects improving the quality of green spaces (pocket parks) and the enclosure of some of the open space allowing residents to gain a sense of privacy. Some physical housing management has also been carried out, for example the refurbishment and transfer of the New Life Buildings to a Registered Social Landlord. What is apparent from all of these different interventions is that the area feels disjointed and isolated from the town, despite its key strategic location and proximity to the town centre.
5.2 Spring Boroughs, as a neighbourhood suffers from particular deprivation in terms of the indices relating to: health, income, education, crime and employment opportunities. It is the largest residential area within the CAAP boundary. Whilst there are some mixed uses, such as employment located along Grafton Street and small local facilities, these are insufficient for the current population, which is estimated to be about 2,200 people (of which 500 are “children” under 16). Overall, compared to the Northampton average, the age demographic is confined to younger people and older people with relatively few families. This is partly due to the availability of suitable housing for families. Ethnic minorities form a significant part of the population of Spring Boroughs, with concentrations of Polish, Bangladeshi and Somalian families.

5.3 There is a lack of facilities on the estate, such as convenience retail, employment opportunities and community facilities. For example, from walking surveys it was found that there is nowhere on the estate to purchase electricity cards (required for the meters in the properties) or facilities to meet with local people on the estate itself. For example, both of the public houses have closed, along with the community café. This means that meeting places and day-to-day retail facilities are severely limited on the estate. Given the area’s location and proximity to the Town Centre, the lack of retail and other employment facilities presents somewhat of a lost opportunity. Due to the lack of “destinations” on the estate, there is very little through movement with people choosing to walk around the periphery of the estate to reach destinations on the other-side of Horsemarket. In terms of physical location, a more direct route from the Market Square (and near to the location of the new Grosvenor Centre/ Bus Station) to the Railway station is through the estate.

5.4 Although there is a lack of facilities on the estate itself, Spring Boroughs as an area is also isolated from the town centre by the engineered character of Horsemarket (North South). The road, which runs from Regent Square (North) to the Gas Street roundabout (South), is highly engineered (and developed as part of the improvements to Northampton Town Centre in the 1960s/70s). Although at-grade pedestrian crossings have been installed, the principal access routes are via the subways. Both the BDP Design and Movement Framework and the Characterisation Study have raised the character of Horsemarket as a significant mental and physical barrier to the connection of Spring Boroughs to the Town Centre. The technical elements are dealt with in more detail in the Transport Technical Paper. Furthermore, these more recent interventions have further eroded the “sense of place” and the historical reference points of the area.

5.5 The residential Stock in Spring Boroughs is principally owned by Northampton borough Council (646 units), with the “New Life” tower blocks maintained by Leicester Housing (140 units). Only 16% of the total properties (68) were purchased under the right-to-buy scheme and are Leasehold. The mix of housing is skewed towards a provision of 1 and 2 bedroom flats, which together make up almost 90% of the total housing stock (86%).

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2 This figure has been calculated using a collection of different data sources including housing records, council tax data and the BMG survey. It is indicative only. A paper outlining how this has been calculated is available.
is not unusual in an inner city area, of the flats 59% of the total stock is one-bedroom properties and these are concentrated into particular blocks within Spring Boroughs, such as St Katherine’s Court which is made up entirely of one-bedroom properties, and St Mark’s House with over 90% one-bedroom properties. The demographic data shows that the population of the area is skewed towards providing accommodation for single people and couples and is not suitable for families. Whilst this may be expected in an inner-city area, there is evidence from the BMG surveys (undertaken for NBC Planning and Housing in early 2011) that families want to live in the area due to proximity to the town centre and other facilities.

5.6 Maintenance of the stock, and in particular council owned stock, is perceived to be a major issue for the area. It is anticipated that all the stock will fail ‘decent homes’ by 2015 if intervention is not made. This presents a particular challenge for the council as; to make the stock decent will require investment whilst there is also a need to look at how the area is meeting the wider housing needs of Northampton Borough. This process necessitates the need to work with the community to ensure that regeneration projects address the day-to-day needs as well as the wider social issues. Furthermore, condition, particularly in St Katherine’s, St Stephens and St Peters house were cited as the most common reason amongst those surveyed by BMG for demolition.

5.7 Whilst the perception may be that those living in Spring Boroughs are part of a transient community, analysis of the tenancy data shows that there is a split. Of those in council owned accommodation, 31% have lived in their current property for one year or less and 41% have lived in their current accommodation for over five years (with 8% having lived in the area for 20 or more years). Therefore, whilst anecdotally, there is a high transient population, there are also significant numbers of people who have stayed in the area. The most frequent reason for a tenancy ending in the area is that the resident is "deceased".

5.8 As part of the evidence base to support the wider aspirations of the Central Area Action Plan, there is a specific focus on the Spring Boroughs area. For example, the Character Area Assessment and Tall Buildings Strategy for Northampton’s Central Area (2010) provides a design and character analysis noting that that Spring Boroughs contains some of the most obvious and prominent tall buildings, which are integral to the skyline of the Central Area. This means that some of the buildings within Spring Boroughs can be seen from different key views and contribute to the current character. The report comments on the architectural character of the area, noting the high concentration of post 2nd World War municipal housing, which replaced the original terraced streets. It concludes that Spring Boroughs is a concentration of high-rise towers (up to 17 stories), mid-rise and deck access flats. The new residential development that fronts Broad Street incorporates 7 storey apartment buildings with undercroft parking.

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3 This sample is reflective of those who answered “yes” to Question X.

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5.9 Although the architecture of Spring Boroughs is largely the subject of personal preference, it is noted that the design of buildings, particularly high-rise blocks makes the current area unsuitable for housing families. This is due to lower levels of outdoor space. Furthermore, there is often a sense of anonymity associated with living in blocks. In Spring Boroughs, the issues of housing families is further restricted due to the fact that many of the municipal blocks contain over 50% single bedroom dwellings and that there are relatively few opportunities within the area to house families and households adequately.

5.10 The density of Spring Boroughs is fairly high for the age and style of the buildings (at around 120dph for the built up area). However, analysis for the population density is only around 123 p. per ha, which is significantly lower. Therefore, as part of the aim and objective of re-populating the central area that focus may need to be on restructuring the profile to provide the population density to support and sustain any new social and physical infrastructure. For instance, the expansion of Spring Lane School to formalise the two-form entry will be essential to ensuring that the area can cater for new pupils as well as those who live in the surrounding neighbourhoods, but meets the longer term needs. The County Council have expressed formally their support of enlarging the school to two-form entry.

6. Progress

6.1 Spring Boroughs is a ‘live site’ with over 2000 people resident in the area. Consultation and early engagement is key to ensuring the delivery of Policy 24. Since Pre-Submission, Northampton Borough Council have been working closely with different community groups and networks that operate in Spring Boroughs to build the relationships necessary to take forward a plan that has full community support and input.

6.2 In November 2011, agreement was reached with the community to express an interest in taking forward a Neighbourhood Planning Front Runner for the area (a programme to trial the new Neighbourhood Planning arrangements within Part 6 (3) of the Localism Act). The focus of this Bid was to establish a formal community forum comprised of residents and people who work within the area to ensure that the community receive clarity over the process. Setting up the Neighbourhood Forum is anticipated to provide the right context and group to help influence and take forward the longer term regeneration plans which can be owned by the community. The bid was successful. The Council has started to support the community in taking forward the formal process of seeking to identify the statutorily defined neighbourhood planning area and the recognised Neighbourhood Forum.

6.3 It is acknowledged that setting up a forum and developing a neighbourhood plan, masterplan or regeneration plan could take a significant amount of time. As highlighted in the consultation responses and the BMG study there is an immediate need to address some of the day-to-day maintenance and environmental issues to address the concerns of current residents. The Council’s Planning Division are working closely with the
housing directorate on a number of initiatives including the Decent Homes Programme and the Community Energy Saving Partnership programme with Eon which were both started in early 2012 with completion of the Decent Homes Programme by 2015. The Council’s decision to begin these smaller measures does not necessarily undermine the CAAP’s aspiration for wider change, but it is acknowledged that the implementation of the policy and the development of a plan and then implementation may take place later in the plan period. Therefore, existing residents will continue to reside in the area and deserve measures to make their home safe, warm and decent. The extent of change that will occur to a large degree depends on the outcomes of neighbourhood planning process, together with in the longer term the future ownership / management of the Council’s housing stock, which the administration have indicated will be subject to consultation by mid 2013.

7. Delivery Framework

7.1 The delivery of Spring Boroughs regeneration will depend on the scale of intervention required. This will not be fully realised until engagement with the community has been carried out. As the council is presently the landlord of over 83% of the homes, other external factors, such as local government finance and alterations to the management of housing stock are also being taken into account. The scale of change required, once there is more certainty relating to these factors, will influence and impact on the delivery partners required. Within Northampton Borough Council, it is critical that the project is delivered jointly between Planning and Housing to ensure that tenants needs are recognised, but that the wider context and opportunities for Spring Boroughs are realised.

7.2 The Neighbourhood Planning Bid, submitted to DCLG, contained detailed advice on the governance and delivery of a Neighbourhood Plan and, in turn, the implementation of the policy. It is critical to recognise the different landowners within the area and how the process will be democratic. The Neighbourhood Forum will:

- Develop and provide an agreed terms of reference for the neighbourhood forum which will reflect how it will work with the local community, local groups, the Council, landowners, wider stakeholders and articulates the agreed expectations of other organisations
- Develop an engagement process which will ensure that the views of local and wider interests are brought together and reflected in developing a plan for the regeneration of Spring Boroughs
- Positively address the relationships of the wider community, stakeholders and landowners within the process and ensure mechanisms for their full engagement throughout
- Ensure that the process clearly links into the Council’s development plan for the area and into the Council’s governance structure4 - as

4 Local Ward Councillors will have a place on the Neighbourhood Forum and will provide scrutiny to the Council’s democratic processes.
the major landowner it is essential that the plan is deliverable and therefore agreed between the neighbourhood forum and the Council

A governance structure has also been drafted to ensure that the project will be taken forward as a priority.

9. Conclusions

9.1 Spring Boroughs is an important priority, both as a development site within the Central Area Action Plan but also as a corporate priority for Northampton Borough Council. Due to past regeneration and redevelopment projects, the process of engaging with the community will be vital to ensuring the success of the policy delivery.
9.2 The extent of the regeneration required will be determined locally and there are a number of different options that communities could choose to deliver the policy. However, it is noted that there are a number of immediate concerns that need to be addressed, to improve the reputation of the Council in Spring Boroughs, such as maintenance of stock and ensuring that residents feel that their views are being heard. Some of these concerns are currently being addressed through programmes such as CESP and Decent Homes.
CENTRAL AREA ACTION PLAN
BACKGROUND TECHNICAL PAPER

POLICY 25: THE WATERSIDE
POLICY 26: THE WATERSIDE – BRAMPTON BRANCH ST PETER’S WAY
POLICY 27: THE WATERSIDE – SOUTHBRIDGE WEST
POLICY 28: THE WATERSIDE – AVON / NUNN MILLS / RANSOME ROAD
POLICY 29: THE WATERSIDE – BECKET’S PARK
POLICY 30: THE WATERSIDE – NENE MEADOWS

1. INTRODUCTION

1.1 This part of the technical paper provides the background information to the strategic development site allocations for Waterside.

1.2 The Waterside forms a substantial part of the Central Area. It includes land running from an area adjacent to the Brampton Arm tributary of the River Nene (to the south of Castle Station), south and eastwards (to include Avon/Nunn Mills and Becket’s Park, Midsummer Meadow and Barnes Meadow). The Waterside area has historically not been addressed in a comprehensive manner. The town has neglected its relationship with the River Nene and canal and in this part of the town to date, and has failed to achieve a positive approach to its future role and direction.

1.3 The amount of development land available within the Waterside area provides an opportunity to enhance and complement the Town Centre’s commercial and leisure offer and in meeting the CAAP’s vision in using the riverside more effectively. In recognition of the need to create a more co-ordinated approach to the river and its environment, the Plan seeks to address the area as a whole to create a much more attractive and accessible waterside environment. A generic policy (Policy 25) addressing the whole of Waterside has therefore been formulated with the aim of setting out the broad principles that will be applicable to the area should future proposals come forward for sites within Waterside that have not been designated.

1.4 However, to assist future delivery and provide more detailed direction for future uses in the area, the CAAP splits the Waterside into smaller development parcels where additional site specific policies apply (Policies 26 – 30). These are listed in the CAAP as Brampton Branch, Southbridge, Becket’s Park and Avon / Nunn Mills and the Meadows.

2. POLICY CONTEXT

National Policy

2.1 Significant parts of the NPPF (Mar 12) are relevant to and provide a positive planning context for the future regeneration of this area including Section 1 ‘Building a strong, competitively economy’; section 2 ‘Ensuring the vitality of town centres’; section 4 ‘Promoting Sustainable Transport’; Section 6 ‘Delivering a wide choice of high quality homes’; Section 7 ‘Requiring good...
design’; section 8 Promoting healthy communities; section 10 ‘Meeting the challenge of climate change, flooding and coastal change’ Section 11 Conserving and enhancing the natural environment and in section 12 ‘Conserving and enhancing the historic environment’.

The majority of the waterside area has been included within the Northampton Waterside Enterprise Zone designation.

**Regional Policy**

*East Midlands Regional Plan (March 2009)*

2.2 Policy MKSM SRS Northamptonshire 3 requires the preparation of a Local Development Document to provide for a long term framework for revitalising and upgrading the quality and facilities of the Central Area, to include development of cultural/heritage tourism by enhancing the existing cultural heritage facilities and attractions, and through the provision of new facilities.

2.3 The Waterside strategic sites policies will contribute significantly to the delivery of the Regional Plan objectives.

**Strategic Policy**

*Pre-submission draft West Northamptonshire Joint Core Strategy (WNJCS) (February 2011)*

2.4 The Joint Core Strategy identifies Northampton as the principal urban area which will:

- Successfully blend the town’s distinctive historic character with innovative new development which will also aim to enhance its riverside setting
- Be repositioned as the key economic driver at the cultural heart of Northamptonshire
- Enhance its role as the leading retail, entertainment, employment, health and learning centre, based upon a thriving mixed economy and the services it offers with continuing pride in its theatres, museums and professional sports teams (and sporting offers)

**Local Policy**

*Northampton Corporate Plan (2012 – 2015)*

2.5 The strategic policies for Waterside will contribute towards the following objectives contained in the Corporate Plan:

- Priority 1: Northampton on track – an economically prosperous, successful and vibrant Town; the Town is nationally recognised as an economic hub and a place to do business; increased

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number of visitors; increased job opportunities and an improvement in the quality of jobs available; promotion and preservation of the Town’s history, heritage and culture

- Priority 2: Invest in safer, cleaner neighbourhoods – a place where people want to visit and enjoy our parks and open spaces
- Priority 3: Celebrating our heritage and culture – increased tourism; promotion, protection and improvement of our heritage and other attractions
- Priority 7: Promoting health and well being – improved public health

3. SITES WITHIN WATERSIDE

3.1 As mentioned in Section 1, the CAAP splits up the Waterside into smaller development parcels where additional, site-specific policies apply (Policies 26–30). These are listed in the Plan as Brampton Branch, Southbridge, Becket’s Park and Avon/Nunn Mills and the Meadows. These sites have been identified from masterplans that have been produced to date and also projects that have been in the pipeline for delivery.

a. Brampton Branch St Peter's Way (Policy 26)

Location

3.2 The Brampton Branch of St Peter’s Way is located along the western end of Waterside as a whole. It accommodates a mixture of vacant cleared sites as well as small-scale commercial premises, and residential properties on Tanner Street. There are also two substantial gasholders with associated plant and storage areas. South west of the gasholders is the B&Q retail warehouse and car park.

Key issues

3.3 The key issues with planning the future of this site are associated predominantly with the gasholders. These operational units pose a health and safety threat to the surrounding areas, and the extensive development exclusion zones associated with it. Health & Safety Executive guidance related to blast zones around the gasholders rules out a large number of potential uses within 50-100 metres of these installations. The gasholders need to be decommissioned in order for a more comprehensive and deliverable scheme to take place. Over recent years National Grid has indicated that it is anticipated that the gas holders will be decommissioned. The latest timescale currently indicated is that a formal decision on starting the decommissioning process is expected in the summer of 2012. When the decommissioning occurs it will open up the opportunity to develop these sites and the adjacent areas. Once decommissioned, there is the issue of ensuring that the site is decontaminated before any developments take place. It is
anticipated that this will take between 2 and 2½ years after the decision to decommission has been made.

3.4 The West Northamptonshire Employment Land Study (July 2010) identified the area including the gas holder site as being a suitable location for commercial development. The work undertaken on the initial Waterside Northampton strategic development framework and further subsequent iterations by David Lock Associates have proposed a primarily commercial focus for this area, with an element of residential development. Whilst both studies demonstrate that a commercially focused development here would be viable, response to the pre-submission consultation revealed that there may be issues with viability.

3.5 It is acknowledged that given current development viability, particularly if there is limited public sector support, together with no or limited increases in the rents available in the Central Area office market could prove to be a challenge for future delivery. However, opportunities such as the Enterprise Zone designation might change the demand dynamic in particular, whilst the Plan provides for a longer-term horizon. Given the need to attract more employment within the defined Central Area, it is considered that the use of the site primarily for office purposes, with a small element of residential together with some ancillary leisure and retail represents a justifiable policy approach.

3.6 In addition, there is the issue of traffic congestion around St Peter’s roundabout. Further information can be found in the Transport section of the technical paper. In a nutshell, this roundabout services 4 key exits points into and out of the town centre.

3.7 Some of the area lies within the historic floodplain. It is defended to a 1:200 year standard. However, if there was a breach in the defences, it could pose a risk as some areas have been identified within the SFRA Level 2 as having limited areas where there is a ‘danger to most’ and ‘danger to all’. The site will need to be subject to further more detailed site specific Flood Risk Assessment consistent with national policy. The river at various points along this part has been substantially altered and contains a legacy of heavily engineered river banks, particularly around Towcester Road. It would be desirable to ‘soften’ this area, to create a more ‘natural’ environment and provide easier access to the water’s edge. This has to be progressed without compromising the area’s position on flooding.

3.8 In terms of land ownership, the West Northamptonshire Development Corporation (WNDC) has acquired property within the development site on the eastern side of the area between Castle Station and the Gas Street roundabout. WNDC owns much of the freehold interests in this area and are in the process of ‘mopping’ up other land between the railway station and the gasholder through a compulsory purchase order process. They are also negotiating with National Grid to assist in bringing forward development within the areas with their ownership.
b. **Southbridge West (Policy 27)**

**Location**

3.9 This area of Waterside is located adjacent to western side of Southbridge. It accommodates an area containing vacant space with planning permission for a public house, a small scale bus depot, the Carlsberg social club and brewery staff parking, public houses and small scale commercial operations. There is a small former dock area that sits within the Carlsberg social club site.

**Key issues**

3.10 The overarching issue associated with this area relates to connectivity and accessibility. The Waterside Masterplan identified its potential as a gateway site to the riverside as well as to the Town Centre. The area currently has no public access along the riverside and is an omission in what would otherwise be a continuous public footpath serving the adjacent Southbridge East and West housing developments built over the last ten years.

3.11 In addition, the area is still dominated by housing development, which creates an impression of an area detached from the more vibrant parts of the town centre. The Waterside Masterplan identified the option of providing either a regional leisure attractor, or alternatively a more commercial/office based development for this area. This supports the mixed use policy approach for the area.

3.12 Finally, in terms of flood risk, the site is protected by defences within the historic floodplain. In undertaking the SFRA Level 2, a breach of the defences on this site formed part of the test. It identified the risk from such a breach within the area as ‘Danger for All’. This would need to be satisfactorily addressed within a site specific SFRA.

c. **Avon / Nunn Mills and Ransome Road (Policy 28)**

**Location**

3.13 The Avon / Nunn Mills and Ransome Road sites are located to the south of the river and form a major redevelopment site within Waterside. The area accommodates a range of uses, but is predominantly used for employment and leisure. It is essentially split into two sites by the disused former Bedford railway line.

3.14 To the north of the railway line is the Avon Nunn Mills site, which accommodates a new Avon Cosmetics Headquarters. This site also retains the façade and some associated plant associated with the former Nunn Mills power station and providing electrical power to Northampton.
3.15 To the south of the railway line is the Ransome Road site, which is occupied by vacant land and a range of general industrial uses. To the south of Ransome Road is Delapre Park, which consists of a historic parkland, gardens, lake, mature woodland and Delapre Abbey. Included in the parklands is a site known for the “Battle of Northampton” and the location of the Queen Eleanor Cross.

**Key issues**

3.16 This area of Waterside contains an extensive area of previously developed land that would, subject to satisfactorily addressing infrastructure issues, be able to provide substantial development. This will primarily be residential. There is also an opportunity to consolidate the commercial element provided by the new Avon European headquarters with further office development provided to meet the vision for the Central Area and the Waterside.

3.17 However, there are three key issues associated with these sites. First, these are large sites which multiple landowners. The conclusions from the Strategic Development Framework recommend that the Avon / Nunn Mills / Ransome Road sites will be developed as a single, coherent new community. The Vision set out in the Framework includes the potential to offer families and commuters the convenience of locating in a sustainable green setting with a variety of local facilities. However, the sites have been subject to a number of planning applications and more detailed master planning, both by the owners / developers and WNDC in association with the Borough Council and County Councils. The former Nunn Mills Power Station south of the River Nene has been subject to a series of development proposals in the past, but it was the availability of the adjoining Avon Cosmetics site (which no longer provides a manufacturing base for Avon) that led to proposals for comprehensive redevelopment coming forward.

3.18 The Ransome Road site was acquired by English Partnerships (now the Homes and Communities Agency) in Spring 2008. The area was the subject of a detailed feasibility study and development framework/masterplanning exercise during 2002 and 2003 as part of the Borough Council and English Partnerships Joint Initiative for Brownfield Land. The development framework proposes that a new residential community be provided with associated community facilities including a new road linking Bedford Road with London Road.

3.19 The Avon \ Nunn Mills site will be redeveloped with offices and provide for approximately 1,250 dwellings. This area together with a further 800 dwellings to be provided at Ransome Road, to the south of the disused railway line, will be planned comprehensively to ensure proper access, (including improvement of Nunn Mills Road) and to provide for effective integration into the town centre. Development will also contribute to the creation of the new riverside walkway and cycle way. The existing railway corridor will provide an opportunity for an alternative public transport / cycling / walking route between the Central Area and Brackmills.
3.20 It is also proposed to construct some 27,870 sq metres of office buildings (including the new European Headquarters for Avon Cosmetics), an extended electrical transformer site, neighbourhood level retail facilities and associated play areas.

3.21 Secondly, in developing the policy, one of the issues highlighted from the evidence base is the need to address the link over the railway line. Although planning approval has been obtained for the development of a road linking Bedford Road and Ransome Road, WNDC is not intending to build a bridge over the railway line.

3.22 Thirdly, the existence of the historic land at Delapre Park and its assets to the south needs to be given significant consideration when assessing policy tools.

d. Becket's Park (Policy 29)

Location

3.23 Becket's Park is one of the town's key public spaces, located on the south eastern corner of the town centre boundary. It fronts onto Bedford Road, and has an extensive river frontage along its southern boundary. Becket's Park is a traditional park along the River Nene, originally designed as a park for promenading in 1783.

Key issue

3.24 Becket's Park's key issue is that it had become underused and was exhibiting a somewhat faded air. It is used more for passing through than a recreational park which people can enjoy. Like many municipal parks, Becket's Park suffered from lack of investment in the last 30 years or so.

3.25 This situation has improved with the development of the Marina in March 2011. It provides the impetus for further investment to improve the Park’s quality, both in terms of the existing activities and infrastructure to improve its future offer. The Becket’s Park Masterplan (2008) highlights the need to include uses that generate more activity throughout the day and those that make better use of the water, to make the environment feel more vibrant and safer, particularly for people walking from Avon / Nunn Mills housing area, via the new Northampton Marina towards St John’s. The Marina provides a key focus for park activities which serves to further enhance this area as a key destination.

e. Midsummer and Barnes Meadows (Policy 30)

Location

3.26 This area of the Waterside is located within the eastern corner of the CAAP boundary. It comprises three land parcels separated by the River
Nene and where it is diverted as the River Nene Old Course (towards Bedford Road). The area is currently a mixture of car parking to the west at Midsummer Meadow, with adjacent close mown grass with less intensively mown / managed semi-natural areas towards the east, including the site of nature conservation value at Barnes Meadow Local Nature Reserve, which is occasionally grazed by cattle.

**Key issues**

3.27 There are several key issues which the plan is seeking to address. The first relates to its existing uses. The eastern area suffers from anti-social behaviour, and is visually screened by a large bund along Bedford Road. This bund is not a part of flood defences and was constructed to prevent illegal use of the site by travellers. There is a need for investment to open up the area, improve wildlife potential, encourage the through movement of people and increase local leisure opportunities. The area to the south of the River Nene between Nunn Mills and the A45 comprises poor quality grassland, it forms part of the local nature reserve, through which a disused railway line runs. Very occasional use of Midsummer Meadow occurs for large-scale leisure events such as circuses and fairs.

3.28 The second relates to investment. There has been some limited investment in riverside footpaths and cycleways, with a bridge repair undertaken in 2009 by the Borough Council. There therefore exists an opportunity to both increase the effective use of Nene Meadows as a whole and secure additional funds to maximise the opportunities it presents. A Masterplan for Nene Meadows, which incorporates part of the site within the Central Area, provides the future direction to the Council in considering the type and scale of uses which could be provided within the site. A Supplementary Planning Document is in the process of being produced to provide further details on the development and design principles for Nene Meadows.

4. **EVIDENCE BASE AND POLICY FORMULATION**

4.1 The following technical studies have been used to inform and formulate all the Waterside policies. These studies are presented in chronological order.

**Central Area, Design and Development Framework (& associated documents) (BDP & CBRE November 2006)**

4.2 In this Framework, the St Peter's Way site (relates to land at St Peter’s Way along the Brampton Branch of the River Nene) was proposed as a mixed use commercial and residential scheme. It was seen as meeting the strategic objectives of addressing the shortfall in high quality business accommodation, maximising the benefit of the waterside assets, providing overlooking of open spaces to increase safety and security and improving gateways to the town centre.
Becket’s Park Masterplan (Halcrow March 2009)

4.3 This was commissioned by NBC to take forward the principles identified in the Central Area Design and Development Framework, provide greater certainty about site specific details, together with addressing delivery issues. Becket’s Park Marina has officially opened and Policy 29 will allow the Park to continue to be developed in a manner which will enable it to perform its role as the pre-eminent formal town centre park.

Waterside Northampton - Strategic Framework (David Lock Associates November 2009)

4.4 This work was commissioned by WNDC. Taking account of the opportunities that existed on development sites likely to come forward in the period up to 2026 adjacent to the River Nene and its tributaries. This Framework looked to take further forward the principal themes for the sites identified within the Northampton Central Area Design, Development and Movement Framework November 2006. It provides a finer grain of detail on the proposed uses for the site, taking account of the site’s constraints and opportunities.

4.5 The proposed uses have been used to allocate the mixed use developments for Waterside.

Waterside - Brampton Branch Site Feasibility Work (David Lock Associates April 10)

4.6 This work was commissioned by the West Northamptonshire Development Corporation (WNDC) to cover the area adjacent to Castle Station south-eastwards to the Carlsberg brewery site. It sought to take forward detailed analysis of the principles set out in the Waterside Northampton - Strategic Framework. The work identified the potential for a substantial amount of office including landmark buildings adjacent to the Gas Street roundabout, together with some residential accommodation fronting the river towards the railway station. Policy 26 essentially seeks to take forward the contents of this masterplan.

Avon Nunn Mills Strategic Development Framework (LDA Design 2010)

4.7 This Framework was commissioned by WNDC to ensure that the Avon, Nunn Mills and Ransome Road development sites were developed in a coherent way providing an integrated community that positively relates to its surroundings. The development would provide for approximately 2000 dwellings together with a significant commercial offer of up to 28,000 sq m. However, this includes the newly developed Avon Headquarters, which is around 10,000 sq.m. Policy 29 seeks the development of Avon Nunn Mills and Ransome Road sites in a comprehensive and complementary manner so the areas function as a single new community.
West Northamptonshire Employment Land Study (WNELS)(Roger Tym & Partners, May 2010)

4.8 The West Northamptonshire Employment Land Study (WNELS) is the key evidence base which has been used to determined policy direction for employment and where appropriate site specific employment allocations. It identifies the sites at and around the Gas Holders for future employment provision. The consultants consider that whole of the Waterside area could offer approximately 43,000 sq.m of office space. This has been reflected in Policy 27 and Policy 16 of the CAAP.

Tall Buildings and Characterisation Study for Northampton Central Area (Space June 2010)

4.9 This area was identified as lying within the Brewery and Avon character areas. The study states that the Brewery District currently feels isolated and disconnected from the town centre due to the severance provided by St Peter’s Way. The River Nene is the centrepiece of the Brewery character area, with key landmarks being Carlsberg and the Gas Holders which aid navigation. The Avon area is defined by the River Nene and the green areas of Becket’s Park and the Meadows, with Avon European Headquarters, the power station and the Marina providing a striking gateway.

4.10 For the Brewery District, the study recommended that it should be designed as a place to work, live and visit, which is well linked too and complements the overall offer within the town centre boundary. Development should enhance movement north towards the town centre and Castle Station. Proposals should also look to fully exploit the potential of the River Nene as location for mixed use development and seek to provide active frontage onto the River. A finer grain of development reflecting Northampton’s heritage is more appropriate, addressing also the need to provide permeability throughout the area.

4.11 For the Avon area, it recommended that development proposals should incorporate a mix of uses including residential and commercial. Residential development should be built to the highest of standards at an appropriate density. Improving pedestrian and vehicular links within the character area as well as northbound towards the town centre should be key considerations in any development proposals. A suitable level of active building frontage needs to be provided onto Delapre Lake and Delapre Conservation Area in order to complement and reflect the area’s natural and historic assets. The above recommendations were reflected in the Waterside policies.

Draft Avon / Nunn Mills / Ransome Road Parameters Report (WNDC / NBC Jan 2012)

4.12 This Masterplan was worked up by WNDC and NBC to provide a finer grain of detail on the development framework completed by LDA. In particular it sought to deal more effectively with providing sufficient flexibility in the development proposals to satisfactorily address the uncertainty surrounding
the crossing solutions of the railway. This issue has been addressed in Policy 28.

**Management Plan**

4.13 Natural England requested that the Council should make reference to the Clifford Hill Management Plan. The plan sets out the current issues affecting the bird interest of the Upper Nene Valley Gravel Pits Special Protection Area (SPA), and sets out a sequential list of actions that will be required to address these. It also identifies that strategic plans such as the CAAP need to include policies which minimise the recreational impact of development proposals within the vicinity of the SPA, that management of recreational access will be an ongoing activity requiring ongoing funding, and that strategies such as the CAAP need to include requirements for securing contributions towards the implementation of access management.

4.14 The Council considers that the Submission text of the CAAP can include reference to this Management Plan. It is not considered necessary to include it in policy as the Management Plan will change over time.

5. **PUBLIC CONSULTATION**

*a. Issues and Options (September – November 2007)*

5.1 Feedback from this consultation event can be summarised as follows:

- The town is not doing enough with its River. There is an opportunity to present a holistic approach when planning the areas along the Waterside
- The area was identified as having an important gateway role and appropriate for office use and leisure use including better use of the waterfront and the green spaces such as Becket’s Park as activity attractors, e.g. water festival.
- There needed to be caution used in deciding on the type and amount of development proposed within areas of flood risk.

*b. Emerging Strategy Consultation (August/September 2009)*

5.2 A fuller assessment is included in Figure 6 at the end of this section of the technical paper. However, feedback from this consultation event can be summarised as follows:

- Use of the waterside for leisure, residential and office was generally supported, with consideration being given to flooding issues
- Residential development must have a greater emphasis on a greater mix than just 1 and 2 bed apartments
- Retail should be ancillary to development proposed. However, site owners considered that further office development on Avon site should not be required and the development of the gasholders sites should be
flexible enough to allow the maximum value to be attained to deal with significant costs associated with decontamination

- The County Council identified that a primary school is now required at Avon / Nunn Mills / Ransome Road to address a shortfall of places within the area
- Comment was also made that the riverside and meadows contributed more to biodiversity within their current form than appeared to be apparent within the Emerging Strategy.

**c. Pre-submission draft consultation (November 2010)**

5.3 The majority of the concerns expressed relate to the developments on the floodplain; the volume of traffic which may increase over time; the quantum of development; the prescriptive element of the policies, the viability of the mix of development proposed and the impacts on the conservation aspects of the area. There was also support given to the policies, including that from British Waterways. The responses can be summarised as follows:

**Design**

5.4 There were concerns about the prescriptive nature of the design requirements including the height of buildings. This has been accepted and amended accordingly. It was considered appropriate to rely on Policies 1 (promoting design excellence) and 2 (tall buildings) to effectively deal with these issues.

**Traffic congestion**

5.5 Concern was raised about the potential increase in traffic as a result of all these developments. It is clarified that there will be junction improvements in some areas which will address these concerns. In addition, the CAAP transport policies will encourage more people to use alternative modes of transport.

**Greenspace**

5.6 Concerns were raised about greenspace generally, including its loss and the need to create a green corridor. The response is that there will be more greenspace provided than lost, and whilst there may be instances where conflicts happen between recreation and biodiversity, this can be considered in more detail at planning application stage.

**Flooding**

5.7 Concerns have been expressed about building on floodplain and the impacts on climate change. It is highlighted that the development proposals are in conformity to Government policy.
Heritage

5.8 There were also concerns about building on historic parkland. It is clarified that the development is to take place along the western edge of Becket’s Park and that any income generated will improve the area. There were also requests to strengthen the protection of the historic Battlefield, which resulted in the Council adding this element to the policy.

Viability and financial burden

5.9 Issues have been raised about the viability of some of the proposals. It is acknowledged that given current development viability, particularly if there is limited public sector support, together with no change in the momentum of the Central Area office market, means that volume of office development identified in particular could prove to be a challenge for future delivery. However, WNDC have done significant work on viability in terms of justifying their acquisition of sites under various scenarios, these show that the sites can be viable. The designation of the Enterprise Zone will raise market perception of Northampton as a place to do business in and also provides the opportunity for additional funding streams that might not otherwise exist. The Plan provides for a longer-term horizon and given the need to attract more employment within the defined Central Area, it is considered that the emphasis on office that exists represents a longer term justifiable policy approach.

6. SUSTAINABILITY APPRAISAL

6.1 The Sustainability Appraisal on these policies in October 2010, and came to the following conclusions:

- All the above policies were found to have significant positive effects, in terms of biodiversity, fauna and flora, health and well being, labour market and economy, landscape and townscape, material assets and population

- Minor positive impacts are predicted in relation to air quality, noise, archaeology, cultural heritage, crime and community safety, energy and climate, social deprivation, soil, geology, land use and waste

6.2 In terms of the mitigation measures, the CAAP should ensure that any proposals that come forward for Nene Meadows should take account of the proximity of the Upper Nene Valley Gravel Pits and any potential to increase activity in the area that might have an adverse impact on it. It adds that 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. Environ recommended that these should be added to the policy in the CAAP.

6.3 The Council is in the process of preparing a Developer Contributions SPD and a Nene Meadows SPD. It is at this level that Nene Meadows can be addressed.

7. DELIVERY FRAMEWORK

7.1 The delivery of all the Waterside schemes is dependent upon a wide range of key stakeholders working in partnership to identify resolutions and achieve consensus on the more technical elements of the policy.

7.2 The Borough Council, together with West Northamptonshire Development Corporation, will continue to work in partnership with developers, Northamptonshire County Council, Homes & Communities Agency, Network Rail and other relevant key stakeholders to ensure that these projects are successfully delivered within the timescale. As a significant part of the Northampton Waterside Enterprise Zone, substantial effort will be made to overcome hurdles that are currently barriers to development in the area.

7.2 In the meantime, the following progress has been made:

a. Brampton Branch St Peter’s Way

Progress has been made on the following, demonstrating the commitment by West Northamptonshire Development Corporation and its partners in delivering the projects:

• Innovation Centre: this office / employment use is proposed to be located close to Castle Station, and is being designed in conjunction with the University of Northampton. Full planning permission for a 3000 sq.m. building has been granted. Discussions with the University about signing a long lease for the property are continuing.

• WNDC has been buying up land in the area from Castle Station to Tanner Street. To complete clear title for the remaining parts of the area WNDC has commenced the formal compulsory purchase order for the remainder of the land.

• National Grid has indicated that the formal decision making process to decommission the gasholder sites will commence in Summer 2012. However, such indications have been given previously. After the formal notice has been made, National Grid will wait another year just in case to see whether the grid can deal with the loss of capacity and if there might be a call on the gasholders in this period. If after this time there is none, the gasholders are formally decommissioned. After this there will be a decontamination of the site, ranging from a year to a year and a half.
• The Council and WNDC has met with Carlsberg and National Grid on occasion to explore the potential to accommodate its expansion needs within overall St Peter’s masterplan area.

b Southbridge West

A planning application has been submitted for residential development on a significant part of this site currently vacant. This is still awaiting determination. In terms of priorities for the strategic partners, this site is of lower priority and as such it is likely that the area will be reliant on private sector interest to take it forward.

c Avon / Nunn Mills / Ransome Road

For Avon Nunn Mills, the Homes and Communities Agency, Northampton Borough Council and West Northamptonshire Development Corporation have been working in partnership to deliver elements of the project including:

• NBC and HCA agreement for providing additional land for the road infrastructure required to create the link from Bedford Road through to Ransome Road
• WNDC obtaining planning approval for this road
• WNDC formally starting the compulsory purchase order (CPO) procedure to purchase all the land at Avon / Nunn Mills, aside from that within the curtilage of the existing newly built Avon Headquarters.
• WNDC undertaking a marketing exercise to gain expressions of interest from developers for the land that it is seeking to CPO.

For Ransome Road, the Homes and Communities Agency are in the process of procuring a development partner to deliver the development. The site is identified as one of their accelerated projects. It is anticipated that a partner will be confirmed by the Summer 2012. Works associated with the London Road / Ransome Road junction have been completed, this will provide suitable access to allow development to proceed. Although the site has a ‘minded to approve’ outline application and associated masterplan, changes to the housing market mean that this scheme is unlikely to be delivered as it was proposed. The new development partner is likely to promote a higher proportion of family housing on site, potentially reducing housing numbers. The same is also likely to be true for Avon / Nunn Mills, although probably to a lesser extent. WNDC is in conversation with Network Rail about the long term future of the rail corridor and overcoming the significant infrastructure cost that will apply if at grade crossing of the line is not possible.

d Becket’s Park

The Becket’s Park Marina was completed in March 2011, with an official opening ceremony held in August. Additional viability work undertaken by CBRE in December 2010 indicated that the residential and café elements of the scheme is deliverable; however to increase income to regenerate the
park, it would be prudent to delay the residential element in particular to a period when the market for apartments is more buoyant.

e Nene Meadows

Work is underway for the preparation of a Supplementary Planning Document on Nene Meadows, with a view to adoption by Winter 2012. Work has commenced on the construction of a significant skateboard/bmx facility.

8. CONCLUSION

8.1 The policies will ensure that the area within and along the waterside are going to be developed in a manner which is both safe and appealing to residents and visitors. They will also ensure that the River Nene and the canal will one day become a primary accessible leisure attraction and living accommodation within the Central Area. Market conditions, disparate landownership and varying landowner aspirations in particular have had an impact on delivery so far and will continue to influence delivery in the short term. There may also be a need to review scheme viability, depending on prevailing market conditions, in particular no upturn in the fortunes of the economy. Nevertheless, actions such as the CPOs and the designation of the Enterprise Zone status show that there is commitment from the public sector to take things forward.

Figure 6: Summary of key responses to the pre-submission draft consultation (November 2010)

<table>
<thead>
<tr>
<th>Consultee Responses</th>
<th>NBC response</th>
<th>Status of policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concerns expressed about the recommendation to build houses on a river floodplain and impacts on climate change</td>
<td>The development proposals are in conformity to the advice given in NPPF in terms of the sequential approach to site selection</td>
<td>No change</td>
</tr>
<tr>
<td>Objections to the use of the historic parkland for more houses and offices</td>
<td>Enabling development is required along the western edge of the Park, to generate income which would enhance the park, improve its public realm and its facilities. Additional housing will also meet future population needs</td>
<td>No change</td>
</tr>
<tr>
<td>Concerns expressed about traffic congestion</td>
<td>Selected junction improvements will allow sufficient quality vehicular access to and from the site</td>
<td>No change</td>
</tr>
<tr>
<td>Concerns about the loss of greenspace</td>
<td>The development will provide more greenspace than will be lost</td>
<td>No change</td>
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<tr>
<td>Reference should be made to creating an active front on the street by developing a visitor attraction at Carlsberg Brewery</td>
<td>The Council would support such a proposition but this is not considered appropriate for inclusion in a policy as this is something that Carlsberg Brewery will need to explore</td>
<td>No change</td>
</tr>
<tr>
<td>Green corridor along the Nene is a haven for wildlife. Should take precedence over recreational pursuits</td>
<td>Acknowledge that there may be conflict between its role for recreation and biodiversity. Each application will therefore be judged on its merits and impacts</td>
<td>No change</td>
</tr>
<tr>
<td>Anglian Water stated that surface water connection will be subject to their policy at the time of the planning application. Reference was made to the Water Cycle Study</td>
<td>The completed Water Cycle Study, together with the County’s Surface Water Management Plan, the CAAP and the Strategic Flood Risk Assessment will guide the required solutions to water issues in the Central Area</td>
<td>No change</td>
</tr>
<tr>
<td>The Strategic Development Framework (SDF) for Avon Nunn Mills is not a suitable document to support CAAP policy because:</td>
<td>NBC and WNDC have worked in partnership to make amendments to the SDF and develop the framework to a point where it could eventually, following consultation, be adopted as an SPD by NBC. During the process of making these amendments and during the production of any SPD, key stakeholders and landowners will be consulted. It is not considered that Policy 28 is overly prescriptive. It has to set out a clear plan and the desire to achieve a high density of the development on these</td>
<td>No change</td>
</tr>
<tr>
<td>- it was commissioned by WNDC, which is not the plan-making authority therefore the document carries no statutory weight</td>
<td>- the consultation process with landowners was poor</td>
<td></td>
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<tr>
<td>The policy is too prescriptive and may prejudice the ability of the</td>
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site to be comprehensively redeveloped.

sites and an effective way of doing this is setting out development principles and targets. The Council considers that the Avon / Nunn Mills site offers a substantial opportunity to provide high quality large floorplate offices for major occupiers, or a range of occupiers in a very attractive location, with excellent transportation links close to the town centre, thus supporting its vitality and viability.

The aims of Policy 25 to transform this area into a positive asset for Northampton are supported by British Waterways. Welcome the acknowledgement of the importance of the canal and its role in assisting with achieving this transformation, particularly regarding the linkages the canal can provide in terms of pedestrian and cycle routes to improve overall accessibility in the plan area. British Waterways considers that an extensive evidence base underpins the CAAP, demonstrating appropriate levels of research and community/stakeholder participation.

Noted. Support welcomed. No change

British Waterways supports the aims of Policy 27 to secure the continuation of the footpath on the river's edge through the site to link up to the Grand Union Canal lock - improved linkages between the canal and the central area.

Noted. Support welcomed. No change
which will encourage greater use of the canal as an important pedestrian route, improving overall accessibility in the plan area.

The Waterside: Brampton Branch St Peter's Way Policy 26 does not provide options and flexibility to allow for Carlsberg expansion. Carlsberg is currently in negotiation to acquire part of the Policy site for possible expansion of the existing brewery. This needs to be included as an option on the site policy to achieve a sound policy, justified and effective.

Further discussions will be required to ensure that all options are addressed in the Policy to; a) ensure that existing employment sites can expand and that opportunities for further employment growth are maximised with the growth of the Central Area b) provide a compatible and sustainable solution to the disposition of uses in the regeneration of the Waterside area.

The detail of the Policy revision will need to be investigated in discussions with Carlsberg UK and other stakeholders and may include possible amendment to separate Policy areas.

Policy 27 The Waterside: Southbridge West Landmark building should not be limited to 3 storeys. Given the strategic gateway location of the site, the height of development immediately to the south of the site and the site's separation from the Brewery, there is potential to secure buildings up to six storeys.

Having considered the site in further detail, the generic application of a blanket three storey limit is not appropriate across the whole site, as adjacent sites show that there is the opportunity to go higher without having significant detriment. On this basis the policy should be amended to remove the three storeys reference and rely on use other policies in the development plan. The “up to 6 storeys” suggestion made by the objector is not supported with any detailed justification and therefore it is inappropriate to use this as the benchmark too.

Policy 27 Bullet Point 1: remove “of up to three storeys in height”

Welcomes site’s inclusion in the policy development area but seeks the protection of existing

The support for the policy area is welcomed. Supported by the HCA there is a programme of

No change
| Operational industrial site until an alternative site for relocation within the city centre is found. | Relocating existing businesses included CEMEX’s operations to other appropriate areas in the vicinity. | A reference to the battlefield in the policy and its inclusion on the proposals map is appropriate. Nevertheless, it has to be recognised that the element of Battlefield that falls within the site has been heavily remodelled through substantial earthworks associated with its previous use as an off road facility. The options appraisal for Delapre out together by conservation experts recommended that consideration be given to providing additional vehicular access/egress from Delapre to Ransome Road to deal with large events that it envisaged would be required as part of the plans for future use of the Abbey and its grounds. The reference to taking account of a future public transport link is considered appropriate, the appropriateness of the link itself can be assessed at a later date, if and when it is considered to be desirable in strategic transportation links. It is recognised that there are discrepancies between the proposals map and principles drawing, both will be amended so that these are removed. | Add Policy 28 Bullet point: Appropriately address the site’s location within and adjacent to the Registered Battlefield of the Battle of Northampton and also make an appropriate contribution to supporting its interpretation in the local area. |

Policy is contrary to PPS5 - CAAP policy should reference the Registered Battlefield to the south of the policy area. Additional Bullet Point to reference the need to protect and enhance the Registered Battlefield. Policy needs to clarify that suitable access Delapre - doesn't include vehicular access. Concern over the access/parking at Delapre Lake/Park and Delapre Abbey - has the potential to harm the significance of the Battlefield. The reference to public transport link in the 15th policy bullet point should be deleted. The Battlefield Area should be included on the Proposals Map. There are discrepancies between the Ransome Road Masterplan and the CAAP Proposals Map. |
| This policy needs to have due regard for the Registered Battlefield located nearby. Additional bullet point - Ensure the appropriate management and interpretation of the Battle of Northampton (1460). Bullet point 3 - should reference cyclists and pedestrians | The Council accepts additional bullet point with regards to the Registered Battlefield and the need to amend the Proposals Map and Principles Figure. The amendment to bullet point 3 is accepted. | Policy 30 Additional bullet point "Ensure the appropriate management and interpretation of the Battle of Northampton (1460)"
Policy 30 Bullet Point 3: Amend to "Incorporate…..and pedestrian and cyclist crossing…."

Policy 26 needs to reference the protection, enhancement and interpretation of the Registered Battlefield. | As the two site specific policies have been amended to take account of the Registered Battlefield issue, this is not considered necessary. | No change

In order to maximise enjoyment of the waterfront, proposed square with cafes etc could overlook the river with complementary landscaping. Moorings could be provided for visiting boats. | It is envisaged that the square will have these features, it is accepted that additional moorings could be beneficial and promote additional animation to the river at this point. The appropriateness of specifically including moorings can be assessed as part of the design process. | No change

Recommend a green frontage is retained between the river and built environment to act as a green corridor for flood risk and biodiversity benefits. Consideration should be given to creating additional inlet of water from the river for a boat turning circle at the end. | This is a matter that is best resolved at the masterplanning stage taking into account the requirements of Policy 4, Policy 25 and Policy 28, balancing increased biodiversity and recreational opportunities. Policy 25 highlights that development in Waterside will deliver "opportunities to extend water courses into adjacent areas." It is | No change
<p>| Keen to ensure that vehicular access is improved and to ensure the success of the marina not just short term drop off parking but secure, safe, nearby, long term parking for boat users is provided. | Drop off parking to the marina will be available. It is not considered that it would be appropriate for Becket's Park to be the location for longer term parking for marina users. St John's public car park is within 400 metres of the marina and this has the provision for car owners to leave their vehicles for longer than a day. | No change |
| EA Waterways suggest footpath along Brampton Arm is fully reinstated and opportunities for low impact boating activities are promoted. | Policy 25: Waterside bullet point 2 which also covers this part of the Waterside seeks the delivery of &quot;Safe, continuous, high quality, public footpath/cycle network along and across the water's edge&quot; and the links are shown in the Development Principles diagram for the site. It is accepted that the addition of low impact boating activities would help to provide more interest on the river which is still navigable at this point. This however is essentially covered under bullet point 5 | No change |
| Vehicular route as drawn: is not achievable until the requirement for construction of a road bridge over the rail line is removed. does not reflect the current route of the main spine road contained in the scheme which obtained a Resolution to grant outline planning | It is recognised that there are a number of issues that will affect the alignment of the road, not least the solution for its crossing of the railway line. Figure 6.12 is about principles, rather than being specific on detailed alignment. The main principle with regards to | No change |</p>
<table>
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<tr>
<th>Consent from WNDC. Amend the plan to show the current route as per WNDC planning decision. the vehicular route is that it will link London Road and Bedford Road. The CPO and planning permission for the road link across the railway provide a defined line. Nevertheless the Council considers that a more sympathetic design would be desirable. Further detail on the preferred alignment can be set out in the masterplan that is worked up for the site. It is considered that there will be additional work required to take forward the site once the HCA has appointed a development partner and that in all likelihood this will require a significant rethink on the outline application previously given a resolution to grant by WNDC.</th>
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<tr>
<td>Sentences and relevant bullet points need to be amended to reflect the fact the there are 2 sites on the development area - Avon Nunn Mills and Ransome Road. 1st bullet point - &quot;...that A SUBSTANTIAL PROPORTION of the AVON / NUNN MILLS AND RANSOME ROAD SITES will be...&quot;3rd bullet point - &quot;...gateway to the AVON NUNN MILLS site&quot;9th bullet point - &quot;riverside path ON THE AVON NUNN MILLS SITE that....&quot;13th bullet point - should Delapre Park be Becket's Park? 16th bullet point - state that the extended electrical whilst it is recognised that there are three distinct sets of land owners, the policy seeks to see the sites developed in a comprehensive manner. Despite the desire of each landowner to try to 'go it alone', the Council along with WNDC believes that each landowner must work together to ensure that a joined up approach is taken. Bullet point 1: The distinction proposed has no material impact on the policy and it is considered that the words do not add anything in terms of understanding to those that currently exist in the policy. Amend bullet point 3 to state: Provide a minimum of 16,000 sq.m of additional office floorspace to meet identified strategic employment requirements and as a gateway to the site along the river front. Amend bullet point 13 to replace Delapre Park with Becket's Park. Amend bullet point 16 to: Include an extended electrical transformer site on Nunn Mills to consolidate ....</td>
</tr>
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</table>
| Transformer is located on the former Nunn Mills Power Station site | Bullet Point 3: It is considered that there is merit in being more specific about the general location of the office floorspace and this could be referenced in this bullet point on the Avon / Nunn Mills side.  
Bullet Point 9: As there is only one river's edge it is not considered necessary to add Avon/Nunn Mills.  
Bullet Point 13: It is accepted that this should make reference to Becket's Park, rather than Delapre Park.  
Bullet Point 16: The main transformer site is unlikely to change and as this is located on the former Nunn Mills Power Station site, it is accepted that reference to this would provide more clarity on its location. | No change |
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<td>Para 6.11.6: 1st sentence: amend to include &quot;...anticipated that THE OVERALL DENSITY OF HOUSING DEVELOPMENT will be.....Nunn Mills AND Ransome Road SITES&quot;4th sentence: amend to say &quot;...both the AVON/NUNN MILLS AND RANSOME ROAD sites....&quot;</td>
<td>The average density takes into account the average density across the whole of the site identified in the policy. The paragraph is clear that there will be a range of densities expected that make up the overall average. It is considered that the existing paragraph is clear enough on the anticipated development type.</td>
<td>No change</td>
</tr>
<tr>
<td>Last sentence of para 6.11.5 should become a new para 6.11.6. This will clarify that Ransome Road site is independent from the Avon / Nunn Mills site.</td>
<td>Noted. As stated before, it is the intention that all sites within the policy should aim to provide a comprehensive development. Therefore it is not considered that there is merit in clarifying</td>
<td>No change</td>
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<tr>
<td>Paragraph</td>
<td>Original Text</td>
<td>Revised Text</td>
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<td>Para 6.11.5</td>
<td>first sentence should read &quot;the commercial use will act as a gateway on either site of the entrance to the AVON/NUNN MILLS site&quot;</td>
<td>It is not considered necessary the paragraph is considered to be suitably spatially specific taking into account the descriptions given.</td>
</tr>
<tr>
<td>Para 6.11.3 and Policy 9</td>
<td>refers to the proposal to safeguard the public transport route between Brackmills and Castle Station. HCA supports the removal of the operational status of the disused railway line. Recommend that to maximise the redevelopment potential and opportunity for pedestrian and vehicular linkages between Ransome Road and Avon/Nunn Mills sites, that the form of public transport promoted should be such that &quot;at grade&quot; road and pedestrian crossings can be provided between the two sites.</td>
<td>Support noted. It's clear that the Council regards elevated solutions to crossing the disused railway line as unnecessary. For the sake of brevity therefore it is not considered necessary to add the suggested wording.</td>
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<tr>
<td>Para 6.11.2</td>
<td>refers to 2 documents which have informed the CAAP policies. Other than the draft Strategic Development Framework, HCA has not seen either documents or consulted on the contents.</td>
<td>HCA was consulted on and has been given the final draft of the Strategic Development Framework. That is still the status of the SDF. The Design Guidance (which provides further details on the SDF) is being progressed with the assistance of WNDC, and will be released for consultation in due course. The Guidance is aimed to provide details from a draft document which HCA has already commented on.</td>
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<td>Agrees with the potential to locate high quality Evidence (WNELS and other ongoing dialogue)</td>
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<table>
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<tr>
<th>offices on the Avon / Nunn Mills site. Questions the financial viability to secure such uses.</th>
<th>demonstrate the commitment from partners like WNDC and related agencies to the projects within the wider Avon / Nunn Mills / Ransome Road area. This issue will be considered again when the adopted CAAP is reviewed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Para 6.11.8: amend as follows - &quot;THE AVON/NUNN MILLS AND RANSOME ROAD SITES SIT within......location of the AVON / NUNN MILLS AND RANSOME ROAD SITES and THEIR ground....However, THERE SHOULD BE PROVISION FOR INCLUSION OF a .... through the AVON / NUNN MILLS AND RANSOME ROAD SITES from......&quot;</td>
<td>It is agreed that the first part of this amendment provides more clarity, as the overall site is split in the earlier paragraphs into two sites. Amend Para 6.11.8 as follows: &quot;THE AVON/NUNN MILLS AND RANSOME ROAD SITES SIT within...... &quot;</td>
</tr>
<tr>
<td>The Waterside: St Peter's Way Due to remediation costs, office development will not be viable; higher value residential/retail as alternative</td>
<td>The Council is fully committed to establishing a viable and realistic development solution for the Waterside-St Peters Way site, both in promoting the soundness of the CAAP and in achieving employment and housing growth in the Central Area. The site has been identified for office use in Policy 15 on the basis of evidence confirming that such use would be feasible. Further discussions with National Grid and other stakeholders will be essential to establish the scale and timing of required remediation. Discussions on the suitability and viability of</td>
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<td></td>
<td>Seek to work with the landowners to get a better understanding of and agreement on viability issues and if possible agree practical solutions that might merit a change in the policy approach prior to Submission of, or Examination of the Plan</td>
</tr>
</tbody>
</table>
alternative uses, as suggested, will be equally important. Within the overarching requirement for delivery, viable alternative uses can be investigated. Potential development sites for retail and residential uses have been identified and evidenced for viability/delivery elsewhere in the CAAP. These would meet projected levels of acceptable growth, particularly for retail. However, such uses may be appropriate options for either mixed use or replacement of office employment on the Policy site. Subject to further discussions, remediation costs may be established as abnormal. This will reinforce the need for flexibility in design and land use proposals on the site. In accordance with National guidance, it is recognised that remediation costs should form a key part of viability assessment and can influence development aspirations in a fundamental way. 

Bullet Point 4: The retention of the Victorian office building has been identified and to encourage this retention, use options would be the subject of detailed proposals ie need not necessarily be restricted to office use. The issue of remediation costs will influence the viability and
| Nature of proposals - inclusion in the Policy is however considered unnecessary | No commitments to biodiversity. | Policy 25 which applies to the whole Waterside area seeks to enhance biodiversity. It will be for the site specific developments within the Avon / Nunn Mills / Ransome Road development to undertake appropriate detailed assessments and propose enhancement. | No change |

<p>| We welcome the recognition of a need to provide a 420 place primary school to serve these sites and the wider area. As mentioned above the school-aged population of the town centre is expected to increase over the next few years due to a recent and continued increase in the number of annual births. The total allocation of some 3,400 dwellings is a cause for some concern as opportunities to provide additional primary and secondary places in the town centre are limited. However, it is welcome that the bulk of these dwellings are phased beyond 2016, which gives us more time to plan and the expectation is that many of these dwellings will be flats and apartments and not expected to contain many school-aged children. We also support the regeneration of the town centre as it is recognised that this may help raise | Noted | No change |</p>
<table>
<thead>
<tr>
<th>The aspirations of pupils and lead to improved attainment and other educational benefits.</th>
<th>The site has existing well used access to the Bedford Road, as well as Nunn Mills Road. There are also numerous other access points along this part of Bedford Road which effectively means that an approach of no access of Bedford Road is unlikely to be justifiable. Nevertheless this issue will be dealt with in greater detail by the Nene Meadow Masterplan.</th>
<th>No change</th>
</tr>
</thead>
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<tr>
<td>The highways authority has concerns as to how this site will be accessed. The site should not be accessed off the Bedford Road and this should be added as a minor amendment to the policy.</td>
<td></td>
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</tr>
<tr>
<td>Welcomes the inclusion of the Avon Nunn Mills development area with links to Delapre Park and Delapre Lake and objectives which promote sport and recreation.</td>
<td>Noted</td>
<td>No change</td>
</tr>
<tr>
<td>The approximate level of 16,000 sqm of office floorspace is likely to be a conservative estimate. Therefore, it is recommended in the policy rather than using the phrase 'approximately' it should be 'minimum'.</td>
<td>This approach would makes the output of the site consistent with the delivery tables set out in other parts of the Plan and fits with the aspiration for the site to be a key employment area.</td>
<td>Amend Policy 29 (now 28) Bullet Point 3 to: &quot;Provide a minimum of 16,000 square metres.....&quot;</td>
</tr>
<tr>
<td>Natural England, in support of their initial comments to the pre-submission draft, added that reference should be made to the need to contribute to the implementation of the Clifford Hill Management Plan. The plan sets out the current issues affecting the bird interest of the</td>
<td>Reference to the Management Plan can be incorporated in the Submission text. In addition, this Management Plan can also be included in the Nene Meadows Masterplan which the Council is currently preparing.</td>
<td>Reference to the Management Plan will be incorporated in the Submission text and the Nene Meadows Supplementary Planning Document.</td>
</tr>
</tbody>
</table>

Northampton Central Area Action Plan Submission Version May 2012
SPA, and a sequential list
of actions that will be
required to address these.

It also identifies that
strategic plans such as the
CAAP need to include
policies which minimise
the recreational impact of
development proposals
within the vicinity of the
SPA, that management of
recreational access will be
an ongoing activity
requiring ongoing funding,
and that strategies such
as the CAAP need to
include requirements for
securing contributions
towards the
implementation of access
management.
Policy 36: Infrastructure Delivery

1. INTRODUCTION

a. Context

1.1 West Northamptonshire is the area covered by Northampton Borough, Daventry and South Northamptonshire District Councils. It is part of the Milton Keynes and South Midlands Growth Area. The policy framework for the area is the West Northamptonshire Joint Core Strategy (WNJCS), which is at pre-submission stage. For the delivery of strategic infrastructure across the three districts, policies within the Core Strategy are detailed and supported by the Infrastructure Delivery Plan, which sets out the key infrastructure required to deliver sustainable growth in the area. This strategic/joint planning process is essential particularly since much of the outward growth of Northampton is proposed across and beyond Northampton’s boundary. The infrastructure and delivery policies in the Pre-Submission WNJCS underpin the delivery strategy within the Central Area Action Plan (CAAP).

1.2 The infrastructure delivery strategy is central to the Central Area Action Plan. It needs to demonstrate that the agencies/partners necessary for its delivery have been involved in its preparation, and that the resources required have been given due consideration and have a realistic prospect of being provided within the plan period.

1.3 The Central Area Action Plan contains a number of strategic development sites, which are key to:

   a) Delivering sustainable growth within Northampton, establishing the town as the key growth and destination centre within the County, and
   b) Regenerating the Central Area. The Action Plan provides a framework for the detailed implementation of West Northamptonshire Core Strategy objectives for Northampton’s urban centre.

1.4 The delivery of the key Central Area strategic sites is being progressed by extensive and ongoing Master Planning. Information on viability, phasing and deliverability is provided in the site-specific part of the technical paper.

b. Policy aims

1.5 The Infrastructure Delivery policy will contribute towards all of the Strategic Objectives as set out in the Central Area Action Plan, which demonstrates the critical role that the Policy has.

1.6 Developer funded contributions will be sought, by means of Policy 36, to mitigate the impact of development and provide facilities relating directly to the development.
1.7 Provision and/or contributions will be sought as appropriate for the elements of infrastructure listed below. Where possible and appropriate, on site provision will be sought but the need for off-site provision (particularly for strategic elements) is recognised. The West Northamptonshire Infrastructure Delivery Plan (WNIDP) will inform the detail of provision together with charging arrangements with the introduction of the Community Infrastructure Levy.

1.9 The approach to implementing the Community Infrastructure Levy in West Northamptonshire, to be agreed by all authorities, is that respective Partner Councils would prepare individual charging schedules for their administrative areas, which would be based on evidence prepared on a joint basis, including input from relevant stakeholders. The West Northamptonshire Infrastructure Delivery Plan (WNIDP) has been prepared on a similar joint basis, to identify strategic requirements to ensure the delivery of the Joint Core Strategy.

1.10 Physical Infrastructure
- New or improved infrastructure provision for utilities - gas, water supply, drainage, sewerage network, electricity, telecommunications and flood mitigation
- Public Transport – Rail and Bus
- Highways improvements and site access
- Pedestrian and Cycleway Improvements

1.11 Green Infrastructure
- Wildlife / Habitat protection and enhancement and the protection and provision of green corridors of movement for wildlife particularly watercourses and associated valley areas
- Green lungs within the urban fabric as part of the sustainable design of new developments which may also have a physical resource function e.g. in providing sites for sustainable urban drainage of development.

1.12 Community or Social Infrastructure
- Community safety initiatives
- New or improved recreational facilities including children’s play
- Public realm improvements to promote social cohesion and community activity
- New or improved educational facilities / resources
- New and improved health facilities / resources
- Community buildings, libraries, places of worship
- Cultural landmarks, services and activities

1.13 The site policies in the CAAP set out relevant site-specific contributions to infrastructure. New developments should meet their own infrastructure needs, whether for transport, utilities or other infrastructure. Residential schemes will be expected to make provision for affordable housing. This would be followed by an Affordable Housing SPD in association with and
subject to the adoption of the West Northamptonshire Joint Core Strategy. Where development viability will be affected by the cost of planning obligations to such an extent that it is unlikely that the development will proceed, developers will be asked to submit a financial appraisal to support their case.

2. PLANNING POLICY CONTEXT

National Planning Policy

2.1 The NPPF emphasises the role that the planning system has in the provision of infrastructure (para 7) develop strategies for the provision of viable infrastructure necessary to support sustainable development (para 31) that local planning authorities should set out the strategic priorities for infrastructure the area in the Local Plan. (para. 156) This should include strategic policies to include the delivery of:

- Provision of infrastructure for transport, minerals, waste, energy, telecoms, water supply and water quality
- Provision of health, security, community infrastructure and other local facilities

2.2 The NPPF stresses that Local Plan frameworks should plan positively for the development and infrastructure required in the area to meet the NPPF’s objectives, principles and policies (para 158). It also highlights the need to work with other authorities to address infrastructure provision (para 162).

2.3 The West Northamptonshire Joint Core Strategy has established strategic requirements for infrastructure in accordance with national policy. The Infrastructure Delivery Plan for West Northamptonshire has been developed with stakeholders to quantify and assess the quality and capacity of all infrastructure and service elements and its ability to meet forecast demands.

2.4 Policy 36 reflects this need to address capacity issues in providing infrastructure with development, the requirement to maximise resources in a sustainable way, and the need to link provision closely to the West Northamptonshire Infrastructure Delivery Plan.

2.5 The need for a Community Infrastructure Levy Charging Regime to be developed in parallel with development plans is emphasised in the NPPF (para 175), in order to ‘support and incentivise new development’ (Para 40). This is reflected in Policy 36 in respect of the means of seeking strategic infrastructure.

2.6 The Policy requires a development viability assessment to be carried out where appropriate.
Community Infrastructure Levy (CIL) Regulations

2.7 The Planning Act 2008 enables local planning authorities to charge for an infrastructure levy within their administrative area. This essentially represents a new system of collecting developer contributions. CIL monies collected must be used for the funding of infrastructure, which will benefit the development of the area and mitigate the impact of new development.

2.8 The CIL Regulations came into force in April 2010 and were subject to minor amendments in 2011. Further minor amendments are currently being consulted on which are programmed to be in force by April 2012. The amendments presently consulted on cover a number of issues including the use of CIL for the provision for affordable housing.

2.9 CIL is to be charged on new development, imposed at the time planning permission is granted, and paid at the commencement of development or (for larger amounts) by instalments over an agreed time period. A charging schedule will need to be set locally for CIL and will equate to a standard charge per square metre for all applicable types of development. Both preliminary and draft charging schedules must be subject to public consultation. The Levy rates within the charging schedule will need to be informed by appropriate evidence on viability. In setting the rates local authorities must strike, “an appropriate balance between the desirability of funding infrastructure from the levy and the potential effects of the levy upon the economic viability of development across the area”.

2.10 Section 106 agreements (or planning obligations) will continue to be used for site-specific mitigation measures that are required to make a development acceptable (such as a new road access) as well as for affordable housing provision, (the latest consultation on CIL Regulation amendments seeks views on a flexible approach to providing affordable housing through CIL spending as well as S106 obligations).

2.11 Policy 36 states that the required provision of infrastructure and/or developer contributions will be sought by a requirement, as appropriate, for a Planning Agreement with the developer and/or developer contributions to strategic infrastructure being sought in accordance with the policies and approach required within the West Northamptonshire Pre-Submission Joint Core Strategy. The Joint Core Strategy proposes that the Community Infrastructure Levy will be employed to deliver strategic infrastructure as identified in the Infrastructure Delivery Plan for West Northamptonshire. Further detailed arrangements are discussed in Section 3 – Key Evidence Base.

Regional Policy

East Midlands Regional Plan GOEM (March 2009)

2.12 Policy 57 – Regional Priorities for Implementation, Monitoring and Review. The Regional Strategy emphasises the importance, in high growth
areas, of the introduction of the Community Infrastructure Levy as a means of seeking and pooling developer contributions to fund essential infrastructure (Para 3.5.6)

2.13 Policy 57 urges Local Authorities to produce Infrastructure Delivery Plans to secure delivery of infrastructure and cites the work of North and West Northamptonshire Development Corporations/Authorities as model infrastructure delivery frameworks.

**Strategic Policy**

**Pre Submission West Northamptonshire Joint Core Strategy (WNJCS), (February 2011)**

2.14 The West Northamptonshire Pre Submission Joint Core Strategy (WNJCS) places emphasis on infrastructure planning being an integrated process, which is reliant on the input of private, public and voluntary service providers to co-ordinate delivery.

2.15 It highlights the key known capacity issues with respect to existing infrastructure, seeks to promote more efficient use of existing infrastructure and provides an indication of the main infrastructure requirements associated with the level of future growth proposed for West Northamptonshire up to 2026.

**The West Northamptonshire Infrastructure Delivery Plan (WNIDP)**

2.16 The West Northamptonshire Infrastructure Delivery Plan (WNIDP) was published in February 2011 and has been subject to ongoing consultation taking place between the relevant and other key infrastructure providers/delivery agencies within West Northamptonshire. The WNIDP is an independent document from the West Northamptonshire Pre-Submission Joint Core Strategy. However, the document sits alongside the Joint Core Strategy and provides key evidence in supporting the policies and strategic approach of the Joint Core Strategy. It is a living document and will be continually updated throughout the Plan adoption process and plan period.

**South East Midlands – Local Enterprise Partnership (SEMLEP)**

2.17 SEMLEP, within which Northampton Borough is a partner local authority, has a critical role in the transition from Regional Development Agencies.

2.18 The South East Midlands aims to become a National Centre of Excellence for advanced technologies, including environmental and low carbon technology and sustainable construction. Some key areas that the LEP will promote are:

- Access to next generation digital communications (By encouraging the supply of Next Generation Broadband in planning policy requirements)
- Alignment of area-wide strategic transport and infrastructure planning
• Support for the transition to a low carbon economy

2.19 LEP partner authorities and businesses will look for opportunities to develop infrastructure tariffs, levies and forward-funding models for the purpose of bringing forward transport, utilities and other capital investments to make development sustainable. Policy 37 provides a local response to both secure infrastructure funding and to do so in a sustainable way.

Northampton Corporate Plan 2012 – 2015

2.29 Key relevant priorities of the Corporate Plan include:

• Priority 1: Northampton on track – the CAAP will contribute towards achieving an economically prosperous, successful and vibrant Town; increase job opportunities and a place to do business; delivery with partners of major town centre regeneration projects; and the promotion and preservation of the Town’s history, heritage and culture
• Priority 3: Celebrating our heritage and culture – the CAAP will contribute towards increased tourism; and the promotion, protection and improvement of our heritage and other attractions
• Priority 4: Making every £ go further – public money used to maximum benefit; a modern diverse workforce

3. KEY EVIDENCE BASE AND POLICY FORMULATION

3.1 This section provides an explanation as to how Policy 36 has developed; the role that the Policy plays in assisting the delivery of future development within the Central Area Action Plan (CAAP) and outlines the key technical evidence bases that have been used to formulate the Policy.

3.2 The Vision and Strategic Objectives for the Central Area have evolved through the consultation stages of the Central Area Action Plan, together with the national context and other technical background. Policies have been formulated to realise the Vision for the Central Area by 2026, by key regeneration. The delivery of the CAAP’s key regeneration sites depends on effective, coordinated and consistent delivery from key partners, in conjunction with a means of securing public and private sector/developer funding.

3.3 The delivery of key development sites to meet the vision for the Central Area will depend on partnership working with key stakeholders including:

• West Northamptonshire Development Corporation
• Northamptonshire County Council
• Highways Agency
• Environment Agency
• Health care commissioning bodies

Northampton Central Area Action Plan Submission Version May 2012
3.4 Major development projects proposed include:

**Retail** - The redevelopment of the Grosvenor Centre – in November 2009, a Development Agreement was signed between the Borough Council and Legal & General. This will enable the demolition of the Greyfriars bus station and the expansion of retail and leisure provision in the reconfigured Grosvenor Centre.

**Leisure/Housing** - The regeneration of St John’s development area – The Borough Council are collaborating with developers/University to secure mixed use development including cultural and leisure provision, student housing and a hotel development.

**Sustainable Transport** – Northampton Bus Interchange - Required as a key part of modal shift measures, in the town centre, and to enable the major retail expansion of the Grosvenor Centre, which requires the relocation of the existing bus station at the rear of the centre (Two-year project commencing 2012).

**Castle Station Public Transport Interchange** - Required as a key part of modal shift measures within the town centre as part of a major regeneration of the railway station and links to it (Three-year project commencing 2012).

Pre Submission West Northamptonshire Joint Core Strategy (WNJCS), (February 2011)

3.5 The Joint Core Strategy emphasises that many elements of the existing infrastructure in the plan area are already at capacity. In responding to the level of growth proposed, the provision of new physical, green and social infrastructure will be essential to ensure future development is implemented in a sustainable and timely manner to support both new and existing communities.

3.6 Future development will bring benefits to existing communities, such as a more diverse and stronger economic base, new and improved services, and access to a wider range of housing. The timely provision of infrastructure, in an efficient way, looking at demand management in a critical way and ensuring there is adequate funding in services and infrastructure is a fundamental part of meeting the spatial objectives and growth delivery of the both the West Northamptonshire Joint Core Strategy and in particular, the regeneration set out in the Central Area Action Plan.

3.7 The provision and management of infrastructure is critical to the achievement of the objectives of the Central Area Action Plan, in that enabling development to take place depends, for example, on the provision and or funding of highway improvements, water and drainage capacity issues being resolved and adequate local services being provided to service new development. Close alignment with Joint Core Strategy Policies for such delivery has been emphasised within Policy 36.

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3.8 Work on the infrastructure evidence base has been progressed to provide detailed information about what types of infrastructure are required and by when, to inform future growth. Further, anticipated costs and potential funding schemes are considered, to inform the delivery of future growth. The focus for the development of the evidence base is the West Northamptonshire Infrastructure Delivery Plan (WNIDP).

The West Northamptonshire Infrastructure Delivery Plan (WNIDP)

3.9 The phasing and delivery of the necessary infrastructure, in coordination with the proposed growth for the area, is an essential component in achieving sustainable communities.

3.10 The current version of the West Northamptonshire Infrastructure Delivery Plan (WNIDP) was commissioned in Spring 2010 and completed in 2011. It refreshes and supersedes previous work undertaken by West Northamptonshire Development Corporation in 2008. The IDP provides the basis for determining:

- the specific local and strategic infrastructure requirements, identified in a phased programme;
- costing for this provision;
- the likely scale of public sector funding required for these works;
- the level of contribution from private sector development required;
- any likely funding gaps between infrastructure requirements;
- availability of funding sources; and
- the future monitoring, and review process.

3.11 The IDP identifies 12 key primary infrastructure projects throughout West Northamptonshire that are required to ensure the delivery of the West Northamptonshire Joint Core Strategy by 2026. There are four strategic projects, which will be critical to the successful regeneration of the central area – relating to waste water and public transport:

Improvements to the Waste Water Network - Northampton Town Centre

- To provide capacity to the main sewer allowing for increases in waste-water flows. Scale and type of solution to be informed by Northampton Central Area Drainage Assessment – May 2012

- Waste Water Treatment Works - Great Billing, Northampton - Increased capacity required for development in Northampton beyond 2015, which may include developments in the central area. Works to commence in 2015 and complete by mid 2016

- Northampton Bus Interchange - Required as a key part of modal shift measures, in the town centre, and to enable the major retail expansion of the Grosvenor Centre, which requires the relocation of the existing bus station. Funding for both the relocation of existing overnight bus
garaging and the new facility has been secured from West Northamptonshire Development Corporation (WNDC), the County Council and Borough Council. The project delivery is being led by the County Council. Two-year project commencing 2012

- **Castle Station Public Transport Interchange** - Required as a key part of modal shift measures within the town centre as part of a major regeneration of the railway station and links to it. WNDC are leading the project in partnership with Network Rail and the County Council within a phased funding regime. The project is seen as key to access links to associated commercial development such as a technology/innovation centre close to the railway station. Three-year project commencing 2012

3.12 More detailed work on the provision of infrastructure has been undertaken through the WNIDP, which provides an accompanying evidence base to the Joint Core Strategy and includes an infrastructure schedule. Information on proposed infrastructure identified in the WNIDP, for sites located within Northampton Central Area, is provided Figure 7 at the end of this section of the technical paper.

3.13 The nature of infrastructure provision means that the IDP will be a ‘living document’ and will be subject to monitoring and review, as providers evolve new ways of meeting needs and additional requirements may be identified. Northampton Borough Council has a key role in this engagement in respect of town centre sites. The infrastructure schedule will be up-dated on a regular basis, as part of the annual monitoring review, to reflect changes to investment profiles and new projects.

**Community Infrastructure Levy Regulations/Planning Agreements**

3.14 A requirement for introducing CIL is an up to date development plan and a demonstrable aggregate funding gap for the delivery of infrastructure associated with the delivery of the development plan. The introduction of CIL is seen as a key mechanism in order to help to provide for future infrastructure requirements to enable both the wider growth envisaged within West Northamptonshire and more specifically enabling the regeneration of Northampton Central Area to take place.

3.15 The timing of the introduction of CIL is therefore required to align with the West Northamptonshire Joint Core Strategy which when adopted will fulfil the requirement for an up to date development plan. Within the timetable of the pre-submission West Northamptonshire Joint Core Strategy, it is anticipated that draft Charging Schedules would be prepared in late 2012-early 2013, with adoption of the CIL Charging Regime following the anticipated adoption of the Joint Core Strategy in Mid 2013. The Borough Council propose to precede and complement this process with a Supplementary Planning Document on Developer Contributions for Northampton District, with adoption of this SPD in late-2012. See further details below.
3.16 The approach to implementing the Community Infrastructure Levy in West Northamptonshire, to be agreed by all authorities, is that respective Partner Councils would prepare individual charging schedules for each of their respective administrative areas, which would be based on evidence prepared on a joint basis, including input from relevant stakeholders. In order to provide for a consistent approach to CIL across the area, it is proposed that the West Northamptonshire JPU would provide a coordination role for Partner Councils in the collection of evidence base material to support a charging schedule, as well as coordinating the work on the preparation to a joint examination. This coordinated approach to major infrastructure provision has been agreed by the partner authorities in West Northamptonshire.

3.17 Significant and timely investment will be required to implement the Action Plan. Developer contributions will be sought through a combination of CIL and planning obligations. Until a locally derived CIL is adopted local authorities in West Northamptonshire will continue to use planning obligations, where appropriate, recognising the restrictions imposed through CIL regulations.

3.18 Northampton Borough Council is producing an SPD on Developer Contributions with a timetabled adoption in late 2012. By this means, there will be early clarity and certainty to assist the enabling of development in the Central Area.

3.19 The West Northamptonshire Joint Core Strategy Team are proposing to introduce further guidance to be adopted on the detail of any financial contributions from developers towards the provision of infrastructure by a West Northamptonshire Developer Contributions Supplementary Planning Document. This would assist the coordinated provision of strategic infrastructure across the three local authorities, some of which will impact on and enable central area developments eg waste-water management and treatment improvements.

Evidence of need for Sustainable Approach to Development

3.20 In promoting sustainability, the Joint Core Strategy does not seek to provide additional capacity by extending or providing new infrastructure without a thorough understanding of whether existing infrastructure could be used more efficiently and by reducing demand through promoting behavioural change. For example achieving modal shift targets from car use to other forms of transport to enable more efficient use of the road network.

3.21 This approach will be critical to the consideration of development requirements within the Central Area, where the capacity of existing infrastructure and services is often at capacity. The Central Area offers a particular opportunity to adopt a sustainable approach for example in encouraging transport modal shift through the mechanisms of parking control, public transport and encouraging pedestrian and cycle movement. Such downturn in highway movements will be crucial to meeting the design
aspirations of greater pedestrian permeability and attractiveness of the town centre.

3.22 The provision of infrastructure and services, in a comprehensive and coordinated manner will be essential in achieving balanced, liveable and sustainable communities, where people will want to live and work. Green infrastructure will be provided to mitigate any adverse environmental impact and to increase the attractiveness of new communities, whether in the workplace, home or for leisure time facilities. Such provision will be required as an integral part of development or by developer funded initiatives.

3.24 The need for a sustainable approach to infrastructure provision is reflected, in Policy 36, since capacity issues within the Central Area necessitate a careful consideration of resource management in order to ensure delivery of the growth proposed.

**Viability/Risk Assessment/Master Planning**

3.25 The introduction of the Community Infrastructure Levy Regulations 2010 (CIL) has enshrined the tests in Circular 05/05 into a statutory requirement which planning obligations are now required to meet (Regulation 122). Local planning authorities must apply Regulation 122 when determining planning applications, in particular the nature of the planning obligations sought from development. The need for the fullest consideration of development viability, in relation to planning requirements, will persist with the development of the CIL charging schedule.

3.26 With the downturn in the property market, decreased land values and a more restrictive climate to obtain development funding, the viability of development can be seriously affected. It is recognised that developers are responsible for assessing the viability and risk factors of delivering their development proposals. However, the local planning authority has a crucial role, to address developer concerns and balance planning requirements in order not to prejudice the delivery of development which in turn would provide infrastructure and community benefits.

3.27 To enable the site specific policies of the Central Area Action Plan to be delivered, the Borough Council must ensure that planning requirements, by planning obligations or by CIL charging, do not impose burdens, which by their scale and scope, threaten the delivery of key development sites. A balance must be achieved which delivers sustainable and serviced development which still provides sufficient returns and incentives for a developer to proceed. The scale of planning obligations and developing CIL requirements for infrastructure and environmental improvements need to be based on robust assessments of requirements for financial and other contributions. At the same time, developers need to be fully aware that without the necessary infrastructure such as highway, drainage, flood defence or service capacity improvements, site developments are unlikely to proceed.
3.28 The development sites within the Action Plan have been the subject of detailed master-planning commissioned by both West Northamptonshire Development Corporation and Northampton Borough Council. These have established a realistic and viable basis for the development of individual sites which reflects the constraints and costs but also the opportunities for major regeneration. These assessments have established a viable mix of proposals and the density and massing required to achieve a commercial incentive to proceed.

3.29 The West Northamptonshire Infrastructure Delivery Plan provides a framework for the strategic and multi-funded provision of infrastructure and services to enable development.

3.30 Both these elements provide a robust and sound basis for the application of Policy 36.

4. PUBLIC CONSULTATION

4.1 Relevant responses from the public consultations to date, which have influenced the policy formulation, are summarised below

Issues and Options (September – November 2007)

4.2 Feedback from the Issues and Options consultation event can be summarised as follows:

4.3 The main comments relating to Infrastructure and Delivery related to the criteria for development sites. The criteria were used in order to identify development sites and were based on national policy guidelines and various stakeholder consultation exercises.

4.4 These are:

- Deliverability and marketability including funding mechanism in place
- Accessibility to various modes of transport
- Contributions to urban design
- Social benefits
- Economic benefits including potential inward investment
- Consultation outcome – public’s request

4.5 In response to Issue 19: Do you agree with the criteria for new development?

84% of respondents said yes

4.6 In response to Issue 19a: Are there any other criteria that you consider should be included and why? The criteria were largely felt to be appropriate. Key additional criteria suggested related to transport and historic character.

4.7 Individual comments included:
Rochmills Group and Derwent Living

- Deliverability also relates to ownership i.e. if a site has a range of different owners, it is likely to have deliverability issues compared to one in single ownership.
- Sites, which are in single/uncomplicated ownership, should be included in the criteria.

4.8 It is recognised that sites in multiple ownership may involve land assembly issues but the requirements in place in Policy 36 can help to resolve joint infrastructure provision and methods of delivery, particularly once Community Infrastructure Charging is in place, will assist this process.

Taylor Wimpey Developments Limited

4.9 The above list should also refer to the capacity of a site in respect of existing and potential infrastructure, and ways that the servicing of the site can be achieved that are consistent with responding to climate change. This would also reflect paragraph 19 of the PPS1 Supplement (An LDD should provide a framework that promotes renewable and low-carbon energy generation) Large mixed use sites will provide greater opportunities for delivering sustainable communities with improved services and infrastructure. Smaller sites do not usually have the capacity and thus viability to deliver infrastructure improvements, and instead draw upon existing schools and public transport networks, and unduly increase the pressure on those existing services and facilities.

4.10 The need to respond to sustainable design requirements is fully recognised and reflected in Policy 36, in that efficient use of existing resources and promotion of behavioural change form part of the policy consideration /requirements. The requirements of the Policy, including the need for viability testing, and the planned associated introduction of CIL Charging, will encourage pooled contributions from smaller developments and provide infrastructure in a coordinated way.

Environment Agency - Anglian Region

4.11 This section should take into account Flood Risk because it materially affects different developments in different ways.

4.12 The policy will need to reflect NPPF requirements and notably the need for a sequential approach to development and flood risk. The plan should recognise that where development in flood risk areas is unavoidable, water compatible uses and lower vulnerability uses, in that order, should be taken forward. (This process of sequential and exception testing in relation to flood zoning and risk is fully detailed in the Technical Paper on Flood Risk and Drainage (Policy 5)).
4.13 The consideration of flood risk and drainage has been addressed in Policy 5 requirements and expanded on in the part of the technical paper related to that policy.

**Emerging Strategy Consultation (August/September 2009)**

4.14 Feedback from the Emerging Strategy consultation event can be summarised as follows:

**Detailed Guidance on Site Specific Policies and Master-plans**

4.15 In developing guidance there is a strong message that Master-plans should be developed in consultation with stakeholders (examples included: owners, businesses, residents, Crime Prevention Advisors). Cohesive town centre developments are required and it is felt that this could be achieved by developing in a coordinated fashion and in line with producing Supplementary Planning Documents and the Action Plan.

4.16 The Grosvenor Centre, Castle Station, Angel Street/ St John’s and Avon Nunn Mills, The Waterside, Becket’s Park and Midsummer Meadow were all referenced regarding how they should be specifically developed. Weight can be given to the Master-plans if they are adopted by the Council.

**Grosvenor Centre**

4.17 Although the consultation document did not ask a specific question in relation to the Grosvenor Centre many comments were received. It was felt that there are opportunities, which could be seized through its redevelopment: removal of subways, increasing active frontages. There are also opportunities to recreate historic street patterns and improve north / south pedestrian links and permeability. A concern was raised that office development should not be viewed as suitable for inclusion within the redeveloped Grosvenor Centre.

**Short Term Phasing**

4.18 There was a mixed reaction to the phasing, although some comments do relate to speeding up action and delivering as soon as possible. A number of sites were mentioned as being brought forward into Phase One, including St John’s, Becket’s Park, supermarket north of Abington Street, Nene Valley Retail Park and the Grosvenor Centre.

4.19 Key constraints were identified. It was felt to be inappropriate to define the Avon site in the first phase of the plan; it is felt that there are other sites, not in Phase 1, that may come forward. Sites will be dependent on other factors like operational and financial considerations (particularly in relation to the Gas Holder Site).
Medium Term Phasing

4.20 It is felt that the Avon Nunn Mills site will continue into this phase as it is such a large scale site. Concern was raised about missing the Decent Homes Standard deadline of 2010 as Spring Boroughs is contained within this phase. The public transport link needs to be a railway link to facilitate linkage with the Bedford line.

Long Term Phasing

4.21 Items that respondents felt should be moved from the third phase into earlier phases are: the Avon site and the Grosvenor Centre as they will have been completed.

Delivery

4.22 The rate of change is too slow and should be speeded up. Concern was raised as to where the investment will come from. The longer term plans for Nene Valley and St James Retail Park do not provide any consideration as to where the current occupiers would relocate to. The Implementation, Delivery and Monitoring section needs more detail about what, where, who and how. It is difficult to predict certainty and more information may be necessary on the delivery of infrastructure to support development. Measures of success must be included within the monitoring framework with regard to the historic environment.

Outcome from detailed comments on Emerging Strategy Document
Consultation in relation to the formulation of Policy 36 – Infrastructure Delivery

4.23 Much of the detail discussed in terms of delivery and phasing has progressed since the consultation both in the West Northamptonshire Joint Core Strategy and the Action Plan. The framework for robust delivery of Central Area regeneration is in place and being developed as Policy 36 reflects. It is important to emphasise that documents like the Infrastructure Delivery Plan are living documents subject to change in circumstances and funding opportunities. The Action Plan establishes the framework for monitoring and delivery of regeneration sites.

Pre-submission draft consultation (November 2010)

Northamptonshire County Council

Paragraph 7.2 - Delivery Vehicles and Specialist Funding Streams

7.2.1: The highway authority raised the issue that the CAAP had been published prior to the Infrastructure Delivery Plan being completed. There is therefore a question of whether key proposals are deliverable.
The detailed information for delivery of the development has been closely aligned with information in the West Northamptonshire Infrastructure Delivery Plan. Review of both documents will ensure that this alignment continues.

**Paragraph 7.4 - Public Sector Agencies and Mainstream Public Funds**

Following the impact of the Central Government spending review it is unlikely that future LTP monies will be available to fund proposals identified. The Highway Authority imagines that many of the schemes outlined within that paragraph for public funding will have to be developer funded instead. If the IDP was completed the position of funding responsibility would have been better understood.

It is clear that there has been a substantial change in the potential public funding of transport infrastructure. However, due to a lack of planning or vision for the town centre items such as changing the character of the inner ring road have not previously been identified, so are not within existing long term transport planning documents, such as the LTP. It is unclear what level of public funding will be available over the lifetime of the Plan. Nevertheless, it is considered appropriate for the Plan to identify the range of necessary infrastructure improvements required and also bids for funding streams that will come up in the future. The IDP is an evolving document and will have a greater level of detail prior to the submission of the Joint Core Strategy and CAAP.

**Northamptonshire Police**

**Paragraphs 7.5 - Developer Obligations**

Pleased to note community safety initiatives are recognised as appropriate uses of developer contributions. Trust this phasing is intended to include contributions directly to the police as well.

Supplementary Planning Documents on Developer Contributions will be produced and adopted for Northampton District and the wider area of West Northamptonshire, the latter in association with local councils. These will identify appropriate contributions required from development to fund specific infrastructure items. Northampton Police will be fully consulted in this process to identify their requirements, in a similar way to their active involvement on the development of the Infrastructure Delivery Plan for West Northamptonshire to date.

**Legal and General**

**Paragraphs 7.5**

Understand the need to improve the elements listed in 7.5.5, however these improvements and contributions should be negotiated on a scheme-by-scheme basis. It should not be assumed all should contribute.
Paragraph 7.5.6 makes it clear that where development viability will be affected by the cost of planning obligations to such an extent that development is unlikely to proceed, developers will be asked to submit a financial appraisal to support their case. In these circumstances the Council will have to weigh up the potential benefits of the development compared to the potential harm that a lack of contribution to some infrastructure will cause.

Highways Agency

Policy 36

Supports the policy. The A45 Access Management Strategy is a scheme, which is required to support growth in Northampton, including the AAP area. This needs to be recognised in the Plan so developer contributions can be negotiated to support the delivery of the scheme.

Paragraph 7.5.5 identifies that contributions are likely to be sought for highways improvements and site access. It is considered that schemes such as the A45 Access Management Strategy, if consistent with the statutory tests for developer contributions set out in Community Infrastructure Levy legislation or in Circular 05/05 would come under this umbrella of highways improvements. A45 improvements are identified in the West Northamptonshire IDP.

Legal and General

Policy 36

The cost of infrastructure development should be shared with the public sector where development meets wider policy aspirations.

The Council will seek contributions in a manner that satisfies the tests set out in statute, national policy and associated circulars.

West Northamptonshire Development Corporation

Policy 36

The approach taken within the chapter is broadly supported. In terms of delivery of key regeneration sites within the CAAP, reference should be made to the role that Regional Growth Funding and European funding could play in delivery. In addition, there is no reference made within the section to the role that Tax incremental Financing could play in the delivery of projects. In terms of the policy on infrastructure delivery if a site does not create a residual land value, which is the case in many regeneration projects the approach to funding infrastructure is unlikely to be successful without a flexible approach to delivery.
Sections 7.1 to 7.5 make reference to a range of potential funding streams. The list is not exhaustive and opportunities will change over time taking account of national funding streams and amendments to the fund raising powers of local authorities. On this basis it is considered that there is not a need to make additional reference to the funding streams suggested. On the issue of residual value, this will be project and time specific - in terms of flexibility, it is accepted that this could be appropriate. Each case will be assessed on its merits.

Pre-submission Draft Focused Change Consultation (December 2011)

Western Power Distribution (East Midlands)

General – non-specific comment

There is currently spare transformation capacity at substations in the Central Area to accommodate further growth. However, when development comes forward, each will need to be considered on its own individual merits, through the normal planning process.

Noted and Policy 36 will assist the delivery of the additional capacity, where appropriate. As an example, the West Northamptonshire Infrastructure Delivery Plan identifies an improved and relocated sub-station as part of the enabling infrastructure for the development of the Avon/Nunn Mills site (Policy 29).

5. SUSTAINABILITY APPRAISAL

5.1 In appraising Policy 37, the Sustainability Appraisal Report (October 2010) concluded that it would have significant negative or minor negative impacts. Significant positive impacts were predicted in relation to air quality, noise, employment, material assets and population. Minor positive impacts were predicted in relation to energy and climate and education and training.

5.2 The report recommended the following mitigation measures be put in place:

   a) The policy should promote the inclusion of renewable energy generation in new development, where feasible, through e.g. requiring planning applications to be accompanied by a Renewable Energy Feasibility Study
   b) The policy should refer to improving infrastructure specifically for providing access to education and training opportunities, particularly where new residential development is proposed

5.3 In relation to recommendation a), the Policy does not require the specific inclusion of renewable energy proposals but it does refer to requiring ‘proposals for the more efficient use of existing services or the promotion of behavioural change’. Also, the specific requirement for Renewable Energy
Studies may be incorporated in the proposed SPD on Developer Contributions.

5.4 In relation to recommendation b), Paragraph 7.5.5 indicates that funding contributions will be sought for off-site provision including new or improved educational facilities/resources. This aspect will also be detailed in the proposed SPD on Developer Contributions.

6. DELIVERY FRAMEWORK

Delivery Mechanisms

6.1 Policy 36 will be delivered through a range of measures:

6.2 The West Northamptonshire Joint Core Strategy in association with a Developer Contributions Supplementary Planning Document will set out the strategic approach to infrastructure provision that will be sought in association with new developments across West Northamptonshire through the Infrastructure Delivery Plan. This will identify infrastructure, which will be secured by:

- The Community Infrastructure Levy currently in legislation or successive legislation (a standard strategic infrastructure charge that local authorities can set through an approved charging schedule for different types of development). Strategic infrastructure funding will be sought through pooled contributions from more than one development, as well as site-specific agreements and other external funding sources.
- Planning obligations (generally on site, or off-site non-strategic infrastructure) through Section 106 of the Planning Act

6.3 A Supplementary Planning Document (SPD) on Planning Obligations for Northampton Borough is programmed for adoption in 2012. This will provide a timely base for the provision of infrastructure of particular important in the transition period prior to the adoption of a CIL Charging Regime for West Northamptonshire.

6.4 A Supplementary Planning Document (SPD) on Developer Contributions may be prepared for West Northamptonshire in due course as a means of delivering infrastructure requirements, throughout the area. If taken forward this document will be programmed for adoption in 2013, in conjunction with the West Northampton Joint Core Strategy adoption and the introduction of a Community Infrastructure Levy Charge.

6.5 As part of the ongoing work under the West Northamptonshire Local Development Framework, to make provision for the introduction of the Community Infrastructure Levy (CIL), a joint West Northamptonshire Infrastructure Board is proposed with four main work areas for joint working between authorities identified:
• Setting the Agenda
• Setting the CIL Charge
• Collecting CIL
• Governance and spending

**Viability Testing of Development**

**Risks to Delivery**

6.6 There are a number of mechanisms, which will be deployed as appropriate, to ensure the delivery of key sites within the Central Area:

1) The Community Infrastructure Levy (CIL) Charging Schedule will need to be set at levels of contribution, which do not undermine development viability. The levy may be charged at an overall rate for Northampton District but subject to research, there may be a case for area variations including the Central Area.

2) The Policy seeks to encourage more efficient use of resources and services by sustainable means and by the promotion of behavioural change, which will reduce the need for new services provision. For some issues such as drainage making the most efficient use of the existing system capacity is essential. Such measures will also ease the burden on development.

3) For major infrastructure provision, funding from planning obligations and subsequent/parallel CIL charging is unlikely to meet the overall infrastructure costs involved. The West Northamptonshire Infrastructure Delivery Plan (IDP) has been established in recognition of the need for the deficit funding being sought from public grants and funding bids, in addition to pooled developer contributions.

4) Another option available is deferred or phased planning contributions ordinarily payable at the start of development. Such payments can be linked to the financial returns of the development as it proceeds and ensure that over the longer term the required infrastructure is provided and the developer is able to sustain the costs. It needs to be stressed that the use of deferred or phased contributions could only be used in exceptional circumstances and may be in conjunction with other measures. Certainly, major works required in preparation for development may require the support of IDP public funding and deferred developer contributions would be appropriate.

6.7 The Infrastructure Delivery Policy will require developers, who submit that the infrastructure and site requirements are too onerous, to undertake a Viability Assessment. The criteria for such an assessment needs to be uniform in order to achieve consistency but sufficiently broad based to include special financial circumstances/site characteristics as appropriate. A broad indication of the principles and aspects of the assessment will help to clarify requirements:

1) A key output of development and driver for development is the Residual Land Value. This is derived from the subtraction of construction costs and profit from the Completed Development Value.
If this is predicted to be less than the Existing Use Value of the site or value of alternative low-outlay uses, then the proposed development will not be viable and will not be delivered. Such an assessment will rely on a local evidence base for comparison and difficulties may arise with variations over time.

2) A large number of development proposals in the Central Area are proposed on brown-field/regeneration sites and any ‘exceptional’ costs arising such as decontamination will require detailed separate assessment of costs and lengthened timescales impacting on development outputs/returns.

3) Increased costs are involved in meeting general and specific sustainability requirements currently emerging, though these may potentially increase sales value. Some fundamental elements may be essential in enabling development eg flooding and drainage measures.

4) Costs will also be significantly affected by assumptions about the nature and type of affordable housing provision, other infrastructure requirements and funding and on major projects, assumptions about development phasing and infrastructure triggers.

6.8 Essentially, the viability of development will be assessed at two stages in plan making. A strategic approach will be required to defend the Community Infrastructure Levy Charging Schedule. More specific assessments, using a broad evidence background, will be required by Policy 36, where the perception is that the viability of sites is at risk.

6.9 Much policy detail in the Central Area Action Plan has examined the viability of extending the retail offer, employment opportunities and sustainable residential communities. Mixed-use development sites have been promoted as a means of maximising viability, vitality and sustainability in the town centre. Consideration has been given to the capacity to achieve, for example, a major extension of the retail offer – the Grosvenor Centre redevelopment is the major opportunity. Other risk contingencies have been established by promoting other retail sites, which would need to be judged in a balanced way to ensure that the viability of the Grosvenor Centre is not diluted.

**Monitoring of Progress**

6.10 Evidence on capacity and deliverability will be updated and monitored in order to inform the consideration of viability and realistic delivery prospects, in relation to individual sites requiring infrastructure and service provision from developers, as outlined in Policy 36.

**8. CONCLUSIONS**

8.1 The Policy is an essential component in the realisation of the Central Area Action Plan. Policies in the Plan both generic and site specific identify the resources and infrastructure required for the delivery of key development sites.
8.2 This delivery will depend on the land use and criteria set for each site ensuring that they are available, suitable and achievable within the Plan period. It will also depend on the application of Policy 36, which provides a sound framework for putting in place the infrastructure, services and setting to enable development. Without the application of the Policy, the development sites key to the timely realisation of the Central Area Action Plan will not be delivered.

8.3 The Policy requires developers to meet requirements within an infrastructure delivery framework, which is evolving at the strategic level for West Northamptonshire – this framework relies on close coordination and planning with neighbouring local authorities, local agencies and service providers. It is anticipated that the adoption of the West Northamptonshire Joint Core Strategy will be in 2013. The associated Infrastructure Delivery Plan (WNIDP) has been published to inform future development in West Northamptonshire. It will coordinate the delivery of strategic improvements such as transport, many of which impact on and facilitate the Central Area growth and character objectives.

8.4 As outlined, developer funding will continue to be sought by Planning Agreements particularly for on-site provision related to the more immediate impact of development. The Community Infrastructure Levy, for which charging schedules are anticipated in place in 2012-13, will be used for the funding of generic requirements and infrastructure requiring funding from a number of developer schemes. The Delivery Framework particularly the WNIDP will be explicit about public funding and grant funding complementing the Agreement/Levy funding.

8.5 Generic requirements will be detailed in an SPD on Developer Contributions for Northampton and this has a timetabled adoption in 2012. Other site-specific requirements would be met, by planning conditions and/or planning agreements.

8.6 Detailed infrastructure requirements are given in site specific policies, to ensure that requirements are clearly stated and transparent, in order to achieve balanced and effective delivery of development on individual central area sites.

8.7 In view of the capacity issues in respect of water and drainage/flooding impacts in particular, delivery will depend on the rigorous application of sustainable design and efficient use of resources, to minimise the impact of new development on existing infrastructure in the town centre and river valley. The requirement for developers to give this the fullest consideration is made explicit in the Policy.

8.8 With many sites proposed for development having a number of constraints such as multiple ownership and significant reclamation/mitigation involved, the need to strike a balance between design and capacity requirements and the commercial attractiveness is a key consideration.
Policy will require developers to provide a full account of the viability and risk involved, in order to get this balance right to deliver development.
## Figure 7: Phasing Table

<table>
<thead>
<tr>
<th>Policy Ref</th>
<th>IDP Ref</th>
<th>Development</th>
<th>Infrastructure</th>
<th>Description</th>
<th>Category</th>
<th>Provider</th>
<th>Funding Source</th>
<th>Estimated Cost</th>
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| Policy 28 IDP F1 | 2 FE Primary School | To serve Far Cotton as well as development | Social (Education) | NCC | Dev/CIF/NCC £4m | 2016-21 |
| Policy 28 IDP F2 | Improved electrical sub station | To enable Nunn Mills Development: Relocation of exstg Physical | Central Networks Scottish Power | Developer | £1.6m |
| Policy 28 IDP F3 | Green corridors and footpath/cycle links | Linkages and open space improvements on adjoining valley areas | Green Physical | NBC/NCC | Developer/GAF £0.4m | 2011 |
| Policy 28 IDP F6, F12 | Community Centre Health Centre | inc Emergency Services/Health Centre | Community | Developer/AHA | Developer £0.8m | 2021 |

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<td>Swimming Pool/Sports Hall</td>
<td>Social</td>
<td>Developer</td>
<td>Developer</td>
<td>£1.3m</td>
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<tr>
<td>Policy 28</td>
<td>Electrical Supply</td>
<td>Physical</td>
<td>Central Networks</td>
<td>Scottish Power</td>
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<td>£2.2m</td>
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<td>Policy 28 IDP F14</td>
<td>Beckets Park</td>
<td>Gas Supply</td>
<td>Physical</td>
<td>Scottish Power National grid</td>
<td>Developer/Public</td>
<td>£1.8m</td>
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<tr>
<td>Policy 28 IDP C3</td>
<td>Pedestrian/Cycle Links/Improvements</td>
<td>Partic to north and east of park - Victoria Promenade/ Avon/Nunn Mills</td>
<td>Physical/Green</td>
<td>Developer/Public</td>
<td>Developer/Public</td>
<td>2011-12</td>
</tr>
<tr>
<td>Policy 30 IDP C3 E7</td>
<td>Waterside Nene Meadows</td>
<td>Pedestrian/Cycle Links</td>
<td>To include Bedford Road cycle crossing</td>
<td>Physical</td>
<td>NCC/NBC</td>
<td>Dev/GAF/Public</td>
</tr>
<tr>
<td>Policy 4, 30</td>
<td>Greenspace enhancement</td>
<td>Inc Woodland</td>
<td>Green</td>
<td>NBC</td>
<td>Dev/GAF/Public</td>
<td>2016</td>
</tr>
<tr>
<td>Policy 4, 30</td>
<td>Biodiversity enhancements</td>
<td>Barnes Meadow LNR</td>
<td>Green</td>
<td>NBC/NWT</td>
<td>Dev/GAF/Public</td>
<td>2016</td>
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<tr>
<td>Site Ref IDP Ref</td>
<td>Development</td>
<td>Infrastructure</td>
<td>Description</td>
<td>Category</td>
<td>Provider</td>
<td>Funding Source Estimated Cost</td>
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<td>Freeschool Street</td>
<td>Public Realm Improvements</td>
<td>Links to Town Centre</td>
<td>Physical</td>
<td>Developer</td>
<td>Developer/Public</td>
<td>2016</td>
</tr>
<tr>
<td>Policy 23 IDP E2, E7</td>
<td><strong>Upper Mounts Gt Russell Street</strong></td>
<td>Pedestrian/Cycle Links/Public realm improvements</td>
<td>Character/Gateway enhancement</td>
<td>Public</td>
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<tr>
<td><strong>CENTRAL AREA GENERAL REQUIREMENTS</strong></td>
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<tr>
<td><strong>Policy 5 IDP E5</strong></td>
<td><strong>Waste Water and Surface Water Infrastructure for development</strong></td>
<td>Local reinforcement for combined, surface and foul drainage</td>
<td>In accordance with Northampton CAAP Drainage Assessment</td>
<td>Physical</td>
<td>Anglian Water/ Developer/ EA</td>
<td>Public/ developer contributions/G AF</td>
</tr>
<tr>
<td><strong>Policy 5 IDP E6</strong></td>
<td><strong>Sustainable Drainage Infrastructure</strong></td>
<td>SUDs to mitigate development and reduce impact</td>
<td>Physical</td>
<td>Developer</td>
<td>Developer £1.1m</td>
<td>2012</td>
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<tr>
<td><strong>IDP E4</strong></td>
<td><strong>CCTV system upgrade</strong></td>
<td></td>
<td>Community (Safety)</td>
<td>NBC</td>
<td>Public/ developer contributions/G AF</td>
<td></td>
</tr>
<tr>
<td><strong>Policy 6 IDP E7</strong></td>
<td><strong>Improvement Of Inner Ring Road: Horsemarket/Broad St Upper and Lower Mounts</strong></td>
<td>Downgrading for Pedestrian/Cycle use/ use/ connections</td>
<td>Physical (Highways)</td>
<td>Public/ developer contributions/G AF</td>
<td></td>
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</tr>
<tr>
<td>Site ref</td>
<td>IDP Ref</td>
<td>Development</td>
<td>Infrastructure</td>
<td>Description</td>
<td>Category</td>
<td>Provider</td>
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<td></td>
<td></td>
<td>Policy 6</td>
<td>Improved pedestrian/ cycle crossings: Morrisons to St Johns</td>
<td>Physical (Highways)</td>
<td>NCC/NBC</td>
<td>Developer/ Public/ developer/ contributions/GAF</td>
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<td></td>
<td>IDP E7</td>
<td>Policy 3</td>
<td>Public realm improvements: Abington Street Market Square Bridge Street</td>
<td>Improved not directly linked to major development sites</td>
<td>Physical</td>
<td>NCC/NBC</td>
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<tr>
<td></td>
<td>IDP E2</td>
<td>Policy 4</td>
<td>Green infrastructure/ Biodiversity improvements: CAAP Appendix 4 Off-site provision as appropriate</td>
<td>Green Greenspace Biodiversity</td>
<td>NCC/NBC</td>
<td>Developer Public/ developer contributions/GAF</td>
</tr>
<tr>
<td>Nene and Brampton valleys (Sub-regional corridors)</td>
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</table>
## Glossary

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>CAAP</td>
<td>Central Area Action Plan</td>
</tr>
<tr>
<td>DPD</td>
<td>Development Plan Document</td>
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<tr>
<td>SPD</td>
<td>Supplementary Planning Document</td>
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<tr>
<td>WNJCS</td>
<td>West Northamptonshire Joint Core Strategy</td>
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<td>WNJPU</td>
<td>West Northamptonshire Joint Planning Unit</td>
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