

Northampton Central Area Action Plan ADOPTION

Consultation Statement (Addendum) on the Proposed Main and Minor Modifications to the Central Area Action Plan

**Planning Policy and Heritage
January 2013**

1 INTRODUCTION

1.1 This Statement provides details of the consultation process undertaken following the Hearing to the Central Area Action Plan in September 2012. This is an addendum to the Consultation Statement undertaken in accordance with Regulation 17(d) of the Regulations.

2 NORTHAMPTON CENTRAL AREA ACTION PLAN

2.1 The Central Area Action Plan (CAAP) sets out the Council's vision for the future of Northampton. It provides detailed guidance for developers on the types of developments which will be acceptable in the Central Area. It also sets out site specific policies for the regeneration of key sites and well as policy guidance for windfall sites.

2.2 The CAAP was submitted to the Planning Inspectorate in May 2012.

3 CAAP EXAMINATION

3.1 Mike Fox, BA (Hons) DipTP MRTPI, was appointed as the Planning Inspector to assess the 'soundness' of the CAAP. The Inspector oversaw 3 days of Hearings held between the 4th and 6th September 2012. As a result of the Hearings, the Council proposed a series of Main and Minor Modifications to address issues of 'soundness' identified by the Inspector. The Main Modifications which addressed 'soundness issues' related to:

- a. The need for a policy to reflect the presumption in favour of sustainable development set out in the National Planning Policy Framework
- b. Amendments to retail floorspace to clarify gross to net ratios
- c. Some flexibility on the amount of floorspace to be provided on the Avon / Nunn Mills and Freeschool Street sites
- d. Policy 26 to accommodate the potential for Carlsberg's brewery operation to expand
- e. The potential for the Avon Nunn Mills site to accommodate Northampton University
- f. The need to provide clarity on the location of and types of interventions anticipated on the Inner Ring Road
- g. Clarifying within Policy 30 that a river crossing would be for pedestrians and cyclists
- h. Identification of the amount of affordable housing being consistent with that set out in the Joint Core Strategy
- i. Clarity on when flood risk assessments will need to be undertaken and acceptable solutions for connections of surface water run-off to the sewerage system and long term management of drainage systems
- j. Preserving and enhancing the heritage assets around Castle Station, providing suitable buildings on Freeschool Street and recognising the importance of the Northampton Battlefield
- k. Amending monitoring targets

3.2 The Council released the Proposed Main and Minor Modifications for representation from 20th September - 2nd November 2012. To ensure that everyone was given an opportunity to comment, the relevant documents were advertised / posted in the following ways:

- Council's Corporate Website
- Council's Corporate consultation portal, Survey Monkey
- Mailshot – emails and letters were sent to everyone on the Council's database
- Advert Notice in the Northampton Chronicle & Echo
- Advert Notice in the Northampton Herald & Post

3.3 All the consultation documents were also placed in Northampton's libraries and the Guildhall One Stop Shop.

3.4 This process resulted in the receipt of 14 representations, summary details of which are attached in this Addendum. Officer comment is also included in the summary. Where it is considered appropriate, resultant suggested minor modifications to the Plan have been made and these have been incorporated into the final CAAP.

3.5 Copies of all the representations received were sent to the Planning Inspector. The Inspector considered all these representations prior to the finalisation of his report and his recommended Main Modifications.

3.6 The Council finalised the CAAP, to include the Inspector's Main Modifications as well as some Minor Modifications which the Council is permitted to do at its discretion.

4 CAAP ADOPTION

4.1 The Council's Cabinet on the 16th January 2013, and full Council on the 21st January 2013, both resolved to adopt the CAAP.

APPENDIX

SUMMARY OF RESPONSES NORTHAMPTON CENTRAL AREA ACTION PLAN CONSULTATION PROPOSED MAIN AND MINOR MODIFICATIONS 20th September – 2nd November 2012

Reference No	Representative	Summary of comments	Officer Comment
CAAP/PM/001	The Coal Authority	No comments	None
CAAP/PM/002	The Highways Agency	No comments	None
CAAP/PM/003	Milton Keynes Council	No comments	None
CAAP/PM/004	Natural England	Note the new policy on “presumption in favour of sustainable development” reflecting advice contained in the NPPF. No further comments.	None
CAAP/PM/005	Network Rail	No comments	None
CAAP/PM/006	Northamptonshire Police	No objections	None
CAAP/PM/007	Shire Consulting (for Barclays)	Objects to lack of modification in relation to Policy 13 which should be amended to allow greater flexibility in relation to A2 uses within Primary Shopping frontages as the Inspector had raised lack of flexibility as a potential soundness issue.	This issue was given a fair airing and considered at some length in round table discussions at the Hearings where the Council’s and Shire Consulting’s position were articulated and debated. At the conclusion of consideration of this matter, the Inspector did not identify any outstanding concerns about the Plan’s soundness or request that the Council consider suggesting appropriate main modifications to the Plan. No minor modifications are considered appropriate in relation to this representation. No change.
CAAP/PM/008	English Heritage	Policy 6: Unsound / Not	English Heritage’s views

		<p>consistent with national policy</p> <p>Recommend that the following sentence be added:</p> <p><i>In addition, there will be an integrated approach to achieving environmental improvements to the highway, linked to an urban design / land use strategy for the ring road</i></p>	<p>were given a significant airing and resulted in extensive debate on the issue of the Inner Ring Road. The suggested wording by English Heritage is not considered to add substantial merit that officers consider would warrant its inclusion. The policy sets out that a Supplementary Planning Document to address the change will be produced. When considered against Policy 1 'Promoting Design Excellence' and the gateways/character areas identified in the Plan in Appendix 1 and 2 it is clear this integrated approach will take place. The additional suggested wording is not necessary. No minor modifications are considered appropriate in relation to this representation. No change.</p>
		<p>Policy 21 (bullet point 5): Unsound / Not consistent with national policy</p> <p>Do not believe that the provision of a public pedestrian route between Angel Street and George Row is deliverable without causing harm to designated heritage assets</p>	<p>English Heritage's views were given a significant airing and resulted in extensive debate on the issue at the Hearings. The Inspector appeared keen to at least support the opportunity of assessing the potential to provide a link through from the Project Angel site to All Saints. The Council proposed wording which allowed the flexibility for this link to be explored further through more detailed investigation. If however, this identified significant harm to the heritage asset this would not be pursued in the</p>

			<p>delivery of the development. English Heritage provided no credible evidence through the examination and in their representation that the link would cause such harm to designated heritage assets that should at this stage rule out the opportunity for its consideration when taking the development of the site forward. No minor modifications are considered appropriate in relation to this representation. No change.</p>
		<p>Policy 26: retain the former gas offices fronting St Peter's Way roundabout as it's a locally important building</p>	<p>This is set out in bullet point 4 which identifies 'the retention and sensitive integration of the existing Victorian brick built former gas company building into the development'. No change.</p>
		<p>Concern about the amount of development proposed for Abington Street East, Drapery (Policy 14 page 8 and Policy 32, page 13) and Freeschool Street (Policy 33 page 13). Although paragraph 6.16.3 of the Submission version makes reference to the scheduled monument, it has not been made clear that the amount of development will depend upon further assessment of impact on the scheduled monument.</p>	<p>English Heritage's views were given a significant airing and resulted in extensive debate on the issues of impact on heritage assets at these sites at the Hearings. Subject to main modifications suggested by the Council, the Inspector was content that these impacts had been satisfactorily addressed in the Plan. In relation to the impact on the scheduled monument, this is considered to be a matter of fact which can be incorporated into the Plan in paragraph 6.88. As such, this is a minor modification incorporated into the</p>

			Plan in Appendix 4 of the Cabinet report.
		<p>Support proposed changes to:</p> <ul style="list-style-type: none"> • Policy 19 (bullet points 8 and 9) • Para 6.8.8 • Policy 30 (bullet point 3) • Policy 33 (additional bullet point) • Figure 6.15 • Monitoring table, Objective 2 • Appendix B B.O.5 • Monitoring Framework, Objective 2 	Noted.
CAAP/PM/009	West Northamptonshire JPU	<p>Recommended changes to the monitoring indicator “annual analysis of heritage assets”. It is suggested that the following amendments are made: For the indicator, change to <i>“Percentage of designated heritage assets At Risk”</i></p> <p>Change the target to <i>“Decrease in the percentage from the 2011 baseline of the English Heritage ‘At Risk’ Register.”</i></p> <p>Remove “Permissions Granted Contrary to Advice” from the ‘Trigger’ column of the Framework.</p>	<p>The proposed modification was made as a result of dialogue with English Heritage and was agreed by the Council. The suggested amendments by the Joint Planning Unit would change the spirit of the monitoring from one which essentially seeks to limit harm, to one which is much more pro-active about positively addressing heritage assets. On balance, it is considered not causing harm should be the backdrop position to test the effectiveness of the Policy. In relation to “permissions granted contrary to advice”, this is accepted as an imprecise measure. There is merit in refining the measure to ‘permissions granted where there was an unresolved objection</p>

			from English Heritage, NBC and NCC conservation teams'. This is a minor modification which has been incorporated into the Plan in Appendix 4 of the Cabinet report.
CAAP/PM/010	Savills for University of Northampton	Supports changes to Policy 28 and considers it sound.	Noted
		Supports changes to Para 6.11.4 and considers it sound.	Noted
CAAP/PM/011	Shirley Jones	Objects to the demolition of Fishmarket.	Noted. No amendment was proposed to Policy in the modifications issued for representations to be made. This is therefore not considered to be a duly made representation, but in any case was addressed extensively through duly made representations reviewed in the examination process.
		Various: plenty of unused office spaces so don't need anymore; do not see the need for a larger train station; Northampton should enhance what it has got and not compete with Milton Keynes	Noted. Many of these issues were given a good airing at the Hearings and where necessary proposed modifications were made.
CAAP/PM/012	Avon Cosmetics Ltd	Objects to Modification in relation to Policy 15 (quantum of offices) and 28 (affordable housing).	The issue of office provision at Avon was considered in detail at the Hearings, with the Council offering the proposed modification to allow a bit of flexibility in relation to office floorspace, but ensure that there was a substantial office component to the development, which the Inspector indicated he was supportive of. The modifications in relation to

			affordable housing were proposed in relation to concerns the Inspector had about the need to ensure that affordable housing is provided in the Central Area. No change
CAAP/PM/013	Anglian Water	The modifications in relation to Policy 5 were not in line with what was agreed in the final Statement of Common Ground.	This is agreed and was a drafting mistake incorporating an earlier version of the Statement of Common Ground. Officers made the Inspector aware of this mistake and indicated support for the position set out in the Statement of Common Ground presented at the Hearings. The agreed position has been incorporated into the Inspector's main modifications.
CAAP/PM/014	Northamptonshire Wildlife Trust	CAAP should include reference to the Nene Valley Nature Improvement Area.	The designation of the Nature Improvement Area is a recent occurrence. It is considered that the existing policy in the Action Plan will support attaining the Area's objectives. However, it is considered appropriate to change the text in paragraph 2.19 to reflect the Nature Improvement Area designation. This is a minor modification that has been incorporated into Appendix 4 of the Cabinet report.