

Northampton Local Plan (Part 2)

Summary Of Responses To Scope and Issues Consultation

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1. INTRODUCTION

- 1.1 Northampton Borough Council is preparing a new Local Plan for the administrative boundary of Northampton, following the adoption of the West Northamptonshire Joint Core Strategy Local Plan (Part 1) in December 2014. Once adopted, the Northampton Local Plan (Part 2) will be the starting point for considering all planning applications within the Borough, alongside the policies in the West Northamptonshire Joint Core Strategy (JCS) and Government guidance including the National Planning Policy Framework.
- 1.2 The new Local Plan (Part 2) will:
- Provide local and detailed policies that are not already the subject of strategic policies contained in the West Northamptonshire Joint Core Strategy;
 - Supersede the policies contained in the Central Area Action Plan which was adopted in January 2013; and
 - Replace the remaining Saved Policies currently contained in the Northampton Local Plan June 1997. This is the current Local Plan for Northampton and it needs updating to effectively guide and respond to future development proposals across the Borough and to reflect more recent Government policy.
- 1.3 The new Local Plan will therefore contain up to date development management and site specific policies to help determine planning applications. It will also identify land for new development for the provision of housing, jobs and other uses as well as areas for protection and/ or enhancements including the historic and natural environment.
- 1.4 A Sustainability Appraisal Report, which considers all the likely significant effects that the Local Plan may have on various environmental, economic and social factors, will accompany the new Local Plan (Part 2). A Sustainability Appraisal is a legal requirement within the plan preparation process. If the new Local Plan is likely to have a significant effect on the environment, the sustainability appraisal must also meet the legal requirements of the European Directive on Strategic Environment Assessment.
- 1.5 The Council is required to undertake consultation at key stages of the Plan preparation process, beginning with the Scope and Issues Consultation stage. In undertaking the consultation exercise, the Council complied with the requirements contained in the adopted Statement of Community Involvement as well as the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. CONSULTATION ON THE SCOPE OF THE NORTHAMPTON LOCAL PLAN (PART 2) AND ISSUES (REGULATION 18)

2.1 This was the first formal stage of consultation on the Northampton Local Plan (Part 2). Representations were invited on the proposed scope of the plan, including the proposed subject area and plan area (development within Northampton Borough) and the proposed plan period (2011 – 2029). It is proposed that the Local Plan (Part 2) will include the following elements:

- Site specific allocations;
- Detailed development management policies;
- Local infrastructure needs in relation to new development (what/ when/ how);
- Retail centres boundaries;
- Built and natural environment policies and designations; and
- Policies map.

2.2 There is also an opportunity to incorporate the following Interim Planning Policies within the new Local Plan:

- Affordable Housing Interim Statement (2013); and
- Houses in Multiple Occupation Interim Planning Policy Statement (2014).

2.3 Some of the Central Area Action Plan (2013) policies have been superseded by recent development and/ or changes in legislation such as recent changes regarding permitted development rights. Therefore, it is recognised that there is a need to review the policies contained in the Central Area Action Plan.

3. HOW WE CONSULTED

3.1 At the Borough Council's Cabinet meeting on 13 April 2016 it was agreed that an Issues stage public consultation be held for six weeks. The Consultation and Engagement Strategy agreed at Cabinet is included in this report as Appendix 3.

3.2 The following documents were published as part of this Issues stage consultation:

a) Northampton Local Plan (Part 2) Issues Paper (including Partial Review of the Central Area Action Plan) – This paper sought views on the key issues which should be addressed in the new Local Plan. There were 31 questions in total.

b) Sustainability Appraisal Scoping Report – This report explained how the emerging Local Plan will be assessed for any potential significant impacts on environmental, economic and social objectives and invited comments on the proposed methodology.

3.3 In addition the Draft Statement of Community Involvement and the Land Availability Assessment Methodology were subject to consultation at the same time as the Local Plan Issues consultation. A Call for Sites was also held at the same time:

c) Draft Statement of Community Involvement (SCI) – The SCI sets out how the Council intends to undertake consultations when preparing planning documents as well as in relation to planning applications and development management matters. This consultation sought to update the existing Adopted SCI. Responses to the draft SCI will be considered separately and are not summarized in this report.

d) Land Availability Assessment (LAA) Methodology Consultation - This consultation sought views on how the Council will assess sites for development.

e) Call for Sites. Submissions were invited of sites to be considered for suitability for development. It was explained that these sites will then be assessed using the LAA methodology. Responses to the LAA methodology and the Call for Sites will be considered in progressing the LAA and are not separately summarized in this report.

3.4 The consultation period was from Wednesday 27 April to 5 pm on Friday 10 June 2016. This was six weeks including two days to compensate for the two Bank Holidays on 2 May and 30 May 2016.

3.5 The consultation comprised the following activities:

- **Statutory consultees:** Letters and email notifications explaining the Issues consultation and providing details of how to respond were sent to all statutory consultees as listed in the Town and Country Planning (Local Planning) (England) Regulations 2012 including specific consultation bodies, the general consultation bodies, neighbouring authorities and prescribed bodies
- **Non Statutory consultees:** Letters and email notifications were sent to non-statutory consultees on the Borough Council's Local Plan database
- **Website:** All the information about the new Local Plan, why it was being prepared, where the consultation documents can be found and how to comment were published on the Council's website
- **Social media:** The Issues stage consultation was publicised on the Council's Facebook page and Twitter feed
- **Press releases:** Two press releases were issued, one before the Cabinet papers were published and one just before the start of the public consultation period

- **Inspection Locations:** All the consultation documents and materials were made available at the One Stop Shop at the Guildhall, two community centres and all the libraries in Northampton Borough
- **Consultation Leaflets:** Leaflets were distributed to all Borough Councillors, Libraries in Northampton Borough, Parish Councils and Neighbourhood Forums in Northampton Borough, to all GPs, major supermarkets and all community centres in Northampton Borough
- **Consultation Banners:** Banners advertising the Issues consultation were placed at the One Stop Shop at the Guildhall, Kingsthorpe Library, Weston Favell Library, Wootton Community Centre and Duston Community Centre throughout the six weeks consultation period. In addition, a set of all the consultation documents and leaflets were also available for reference at these locations
- **Workshop for Borough Councillors:** All Borough Councillors were invited to a workshop on 3 May 2016 to receive a briefing on the Local Plan preparation process and timetable and to discuss the issues identified in the consultation
- **Workshop for Parish Councils and Neighbourhood Forums:** A workshop was held on 4 May 2016 for all Parish Councils and Neighbourhood Forums in Northampton Borough to receive a briefing on the Local Plan preparation process and timetable and to discuss the issues identified in the consultation
- **Drop In Session:** On the afternoon of 18 May 2016 the Planning Policy team were available at the One Stop Shop at the Guildhall to answer questions about the Issues stage
- **Employment Workshop:** A workshop was held on 25 May to focus on generating participation from property agents and developers to input into the Employment Land Study, which will inform the Local Plan. This workshop also provided the opportunity to discuss issues identified in the Issues Paper and encourage participation in the Local Plan process.
- **Meetings with Organisations:** During the consultation period the Planning Policy Team also met with various organisations to discuss the issues. Meetings were been held with NEP, SEMLEP, Environment Agency, Anglian Water, Northampton Town Centre BID, Brackmills BID, Northamptonshire County Council, South Northamptonshire Council and Daventry District Council.

3.6 Comments were invited electronically, by email and through Survey Monkey, or by post. For those who do not have access to a computer, and were unable to visit any of the inspection locations paper copies of the consultation documents were available by phone or in writing from the Planning Policy team. All the documents were also available in other languages and/formats on request.

4. RESPONSES TO THE CONSULTATION QUESTIONS

4.1 A total of 50 organisations and individuals responded to the Issues consultation:

- Website: 11 responses were received online through Survey Monkey (NB two responses were from the same respondent who confirmed that he wanted his email version to be recorded as the submitted version. Another respondent had an identical response in email form, and his online version has been counted here)
- Email: 37 responses were received by email
- Post: 2 responses were received by post

4.2 One response was received after the consultation deadline which means it is not duly made. The response has been included in this summary but clearly marked as not duly made.

4.3 A list of respondents is included as Appendix 1 to this report. A list of the number of responses received by question in the Issues Paper is included as Appendix 2 to this report.

4.4 It should be noted that there were:

- 553 recorded visits to the website;
- 4,358 people received the information via Facebook; and
- 8,248 people received the information via Twitter.

5. THE NEXT STAGE

5.1 The responses received to the Issues consultation, including the feedback from the workshops and meetings will be used to inform the preparation of the Local Plan Options which will identify options for the Local Plan's policies and proposals. It is expected that the Options consultation stage will be held in September to November 2016.

6. SUMMARY OF RESPONSES RECEIVED TO THE NORTHAMPTON LOCAL PLAN (PART 2) ISSUES PAPER CONSULTATION

Question 1 – What are the main issues relating to housing delivery, mix and affordability which the Local Plan (Part 2) should consider? The Local Plan (Part 2) will not be reviewing the number of new homes that is already identified in the adopted Joint Core Strategy.

Question 1 - Overview: Summary Of Responses

There were 27 respondents who made comments on this question. This question generated the highest number of responses and the key messages are:

a) Strategic housing requirements and the five year housing land supply

- There is a general consensus that there is a need to identify sites in the Local Plan for housing if the housing target of 18,870 over the plan period is to be met. A comment was made that this figure should be seen as a minimum. There is also a comment about the need to consider how the Northampton Related Development Area (NRDA) housing need will be met (in conjunction with neighbouring authorities). There is also an emphasis by a few respondents on the importance of continued joint working between Northampton Borough Council, Daventry District Council, South Northamptonshire Council and the Borough Council of Wellingborough to secure the delivery of the NRDA housing figures. The Local Plans should include a robust development framework to implement growth in Northampton, whilst at the same time address the matter of accommodating growth in and beyond the NRDA boundary. A suggestion was made in terms of preparing a joint study to consider the capacity of the NRDA and options for additional growth. Another comment referred to the need for the Borough Council to explore all options to accommodate its need within its boundaries, maximising the use of brownfield land.
- There are several references to the lack of a demonstrable 5 year housing land supply and the need for flexible policies to kick start housing delivery. There is a need to deliver the right homes in the right places, meeting people's needs and integrating the Sustainable Urban Extensions (SUEs) into the wider area. Comment was made on providing a clear direction for growth/spatial strategy which signposts the need to exploit the full potential of allocated SUEs and that delivering housing in SUEs is one of the most sustainable options for delivering new developments. Reference was made to testing the capacity of the remaining land which has not received planning permission at south of Brackmills SUE and that increasing the quantum of housing in this SUE would also be a sustainable option.

b) Housing delivery and flexible policies

- There was a comment that many new homes will be delivered on small and medium sized sites. The Local Plan must identify a range of smaller sites both within and adjoining the Borough boundary and see if they are available and deliverable in the short term. If not, a full review of the West Northamptonshire Joint Core Strategy is required. A comment was made that historical completions and windfall sites should also be included when considering housing delivery. There is an overview that the policies formulated should be flexible and not create undue constraints as inflexible policies will impact on viability and deliverability. Flexibility is also required to secure the realisation of additional windfall sites, in addition to allocated sites,

as there is a requirement for a variety of sites to come forward and within shorter time leads. Also, the Borough Council must proactively engage with the development sector to ensure that allocated sites are viable and deliverable

- A comment was made that housing mix and delivery should be considered on a site by site basis and not prescribed through inflexible plan policies

c) Developer contributions, Community Infrastructure Levy and affordable homes

- More certainty is required about the relationship between the Community Infrastructure Levy (CIL) and affordable housing delivery. There is also a comment on the need to consider recent Government Guidance on affordable housing, including starter homes, to restrict planning obligations and to not have any affordable housing on sites with less than 10 dwellings.
- Comments were made about the definition of affordability in terms of what it is, what the percentage should be and how it is determined. Also, policy changes emerging at national level should also be taken into account in the new Local Plan. Any policies concerning and definitions of “affordable” should take into account rent to buy affordable housing.
- One respondent considered there to be a housing crisis in Northampton and that building more houses cannot be assumed to resolve it. Also, the situation would get worse if new homes are provided with low levels of affordable housing. Recommendations were provided with regards to social housing/ building enough within a generation to meet all the needs/ refurbish and improve homes and estates/ and encourage people to start housing co-operatives. A comment was made about the size of the houses. A suggestion was given that there is a need to work out how many people cannot afford houses on the open market and set the requirement so that the equivalent number of homes are affordable.
- The imposition of CIL combined with affordable housing targets will result in viability issues for developers which means that there will be viability issues and additional sites will be required to deliver affordable housing.

d) Infrastructure

- Some respondents raised the issue of infrastructure and that their deliverability and associated costs are important. Other comments include queries on whether the roads could cope, and that drainage and highways need to be provided in full prior to dwellings being constructed. Reference was also made to the need for other infrastructure to be provided before the houses are occupied. In addition, there were comments associated with ensuring that appropriate sports facilities/ playing fields need to be provided to meet demand generated by the new developments and that evidence should be provided to show if new facilities/ upgrade of existing facilities are required.

A question was asked as to what percentage of homes will have reasonable garden space. There is also a comment that there is a need to encourage more compact communities where cycling, walking and public transport are the norm and not cars.

e) Housing mix

- Although there were separate questions on housing mix and houses in multiple occupation (HMOs) a variety of comments were made including the need to control houses in multiple occupation by restricting them and to cease the conversion of family housing. There was also a reference to former Council houses or social housing which have been let to multiple tenants. It was commented that these should be returned to their original use. Also, there should be more bungalows and the older population should have housing with full mobility access. One comment relates to the town centre, where there is a lack of a good mix of different types of housing to support a diverse community and that there are too many tiny flats and HMOs. It was suggested that balance is needed to restore and maintain vibrancy to regenerate the town centre and safeguard its heritage assets. In terms of the Central Area Action Plan a comment was made that a mix of houses is required to include affordable starter homes and family homes to help graduates develop careers in the area and make it an attractive place for young people to relocate to. It was suggested that more housing in the town centre could include work live units which can contribute to a thriving culture.

f) General Comments

- Reference was made to the need to protect the historic environment and to obtain from developers sufficient data about the potential archaeology, heritage and historic buildings that the development plan will affect before any outline or full permissions is granted.
- Comments were made about the reluctance of developers to use expensive brownfield sites and instead directing developments towards the countryside and the edge of urban areas.
- Comments were also made in relation to the Growing Together Neighbourhood Plan which is being progressed. There were elements in the Plan which were considered relevant to this question including the need for new residential development to provide a mix, maximise affordable homes and homes for social rent and increase the availability of 1 and 2 bedroom homes. There is a preference for small scale developments on infill sites, redundant garage sites and low value/ underused open space. Several brownfield sites are considered suitable for residential or other forms of development. These are the former Emmanuel Middle School, former Lings Upper School former Blackthorn Middle School and the former Silver Horse Pub site
- Comments were made in relation to the status of West Hunsbury and the need for the ambience and character of the area to be protected. Exceptions

were provided which include underused green spaces like areas adjacent to Claystones in West Hunsbury which could be used for housing, sports facilities and so on.

- Comments were made on the reference to the new University campus in the Issues Consultation Paper and that this was supported. There is a need for the new Local Plan to identify the existing University of Northampton campuses as sites for future housing as these could contribute towards meeting the shortfall in the 5 year housing land supply.

Question 2 – Do you think that we need sites that can deliver new homes more quickly, in the short to medium term?

Question 2 - Overview: Summary Of Responses

16 respondents provided comments on this question. The key messages are:

- Several respondents answered yes to this question, and no one disagreed.
- There were several respondents who commented that the housing policies should provide a framework to deliver the housing requirement and the 5 year housing land supply over the plan period, and that more houses/ sites are needed and needed quickly. Some have expressed this with a degree of urgency. Failure to maintain a 5 year housing land supply could have adverse economic and social impacts. There could be a huge shortfall by the time the plan is adopted in 2018. Reference is also made to the need to identify sites so that the 5 year housing land supply can be maintained over the plan period. Additional sites are also required in the short to medium term to meet shortfall in the NRDA. Some referred to the fact that building rates need to be accelerated.
- There is also consensus that allocations for residential development must be made and sufficient supply of deliverable sites is required to meet Northampton's needs.
- One respondent suggested a timescale of 2020 for the delivery of new homes.
- One respondent referred to the Northampton South Sustainable Urban Extension which can contribute to sites within the short to medium term.
- Some respondents have provided the same response to several questions including the response associated with housing crisis and social housing.

- One respondent expressed concern that the Borough Council has commented on a number of applications recently suggesting that if permitted they could contribute to the NRDA supply. This relates to the comment that there is a need to ensure sufficient supply of deliverable sites to meet Northampton's needs. Another expressed concern that the Borough has no mechanism to meet its housing needs through sites that meet the definition of "deliverable". If this undersupply continues, the Joint Core Strategy and the Local Plan Part 2 could be considered out of date when assessed against the National Planning Policy Framework. The respondent recommended that the Council should work proactively with adjoining authorities to identify suitable sites that fall within Northampton's sub-housing market area.
- One comment relates to the scope for early delivery on sites where there is early delivery of rent to buy affordable homes.
- One comment relates to the need to ensure that new homes should not be delivered without infrastructure being planned and delivered. Reference to infrastructure includes a fully functioning and operational inner and outer orbital road systems to move traffic through and out of town effectively.

Question 3 - Do you think that we need a mix of market housing e.g. family homes, housing for single households?

Question 3 - Overview: Summary Of Responses

There were 17 responses to this question.

All respondents agreed that a mix of housing is required. Key comments include the fact that affordable housing should be provided in accordance with national planning guidance and evidence base, not whims of developers to maximise revenue and profitability. Another referred to the need to have regard to the emerging Neighbourhood Plan. The housing mix should be designed through strengthened new build housing standards, and accord with principles of sustainable development and good design when considering locations.

There is a suggestion that a prescriptive mix should be avoided, allowing developers to provide a mix that their customers require. It was recommended that a site by site negotiation should be undertaken for affordable housing with the most appropriate mix applied to each site subject to viability and constraints. Another suggestion is that the mix should be informed by the Council's Strategic Housing Market Assessment and relevant documents.

A range of mixed housing was recommended from a mixed balance of families/ couples/ single people/ young, middle aged and old aged/ renters and homeowners/ variety of working backgrounds/ long term and short term residents to the need for

more flexible properties and larger executive/ family homes away from the town centre and in peripheral locations. Some suggested that a balance is required to build stable and vibrant communities and others state that there is still a significant level of affordable needs that the Council will need to meet. Another commented that a shortage of affordable homes should not override the need for a mix of other housing like family homes and housing for single occupancy.

Question 4 - Do you think that we need a mix of affordable housing eg. affordable rent, social rent, shared ownership, Starter Homes?

Question 4 - Overview: Summary Of Responses

There were 18 respondents on this question. That said, some respondents have commented on the basis that Questions 3 and 4 are asking similar questions and do not necessarily distinguish between affordable housing mix and a mix of market housing. For this question, all agreed that a mix of affordable homes is needed and some added that this should be done in accordance with Government's Framework. However, one respondent was uncertain as to whether the new Local Plan will be the most appropriate document to prescribe the mix. If it is to be included in the Local Plan, then the mix should be for indicative purposes only and subject to negotiation on a site by site basis.

Similar to Question 3, there were comments that the mix should be driven by analysis and case studies and not developers. In other words, the appropriate mix should be based on evidence and not the requirements of developers. The mix should also be determined on the merit of each application. One comment referred to the need for the Borough Council to be strong and people driven. One respondent referred to the Growing Together Neighbourhood Plan and the need to maximise the proportion of homes to meet the needs of local families.

Comments were also made on the mix and "affordability" itself including:

- Shared ownership is a scam. The property should be owned or rented;
- Starter homes welcomed;
- Starter homes a valid form of affordable housing;
- Northampton is relatively affordable, but access to suitable accommodation to meet Northampton's needs is limited;
- Affordable housing should be determined in relation to an appropriate multiplier or percentage of the national minimum wage;
- Provision of affordable housing is complex and there is no one size fits all solution;
- Housing crisis in Northampton – get to the root of affordability, build more social housing;
- Rent to buy affordable housing could boost site viability;
- As the University grows, there will be more demand for affordable housing. Demand also from people with low incomes who cannot afford to buy;

- There is a need to cater for all different situations. However, discounted homes in the definition of affordable homes is worrying because the financial incentive is a one off and only benefits first time buyers and not first time buyers of the future; and
- Emphasis should be on affordable rented homes.

Question 5 – Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to access and space standards?

Question 5 - Overview: Summary Of Responses

There were 11 responses to Question 5 on introducing the national housing technical standards on access and space:

- Three respondents considered that introducing the standards in to the LPP2 would be a good thing. These respondents expressed concern that residential units are getting smaller leading to poor amenity for residents at the expense of quality of life.
- Five respondents expressed a concern that introducing these technical standards could have a negative impact on viability and deliverability. The necessity to fully assess any local need for such standards and the viability impact of introducing them was highlighted.
- One respondent stated the need would have to be fully tested in line with the NPPG. Another respondent called for more car parking facilities on new developments. One respondent drew a comparison with an emerging Neighbourhood Plan requirement stating that new residential should provide good quality outdoor amenity space.

Question 6 – Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to water efficiency standards?

Question 6 - Overview: Summary Of Responses

There were 9 responses to Question 6 on the optional national housing technical standards for water efficiency:

- Three respondents considered that the Local Plan introducing the standards would be appropriate, two of which noted the need to consider the impact this requirement would have on overall financial viability.
- Two more respondents expressed concern on the adverse effect the introduction of such standards could have on viability and deliverability. A third noted the need to fully test any proposed introduction in line with the NPPG.
- Other comments included:
 - Northampton is identified as a water stressed area on the Environment Agency Water Stressed Area Classification Maps
 - No need to duplicate JCS Policies S11 or BN7A as the amended Building Regulations state the optional requirement of 110 litres per day per person will be required where the planning condition states. A policy to this effect for Northampton would secure the tighter standard for all new housing
 - Grey water recycling and SUDS to catch rain water should be mandatory
 - A comparison with an emerging Neighbourhood Plan requirement which establishes that new housing developments should achieve high level environmental performance
 - The Local Plan could create a reservoir on the A5199 near the Windhover Pub to minimise flooding and avoid drought risk

Question 7 – Are there particular sites that are not used currently for employment uses which you consider would be particularly suitable for new employment uses? The Local Plan (Part 2) will not be reviewing the jobs growth which is already set out in the adopted Joint Core Strategy.

Question 7 - Overview: Summary Of Responses

12 respondents responded to this question, one of which was not duly made as it was received after the consultation had closed.

There was a consensus about the need to secure economic success for Northampton and to support the economy by strengthening and diversifying the local economic sectors by retaining and provide high quality employment space. However, there were concerns about housing and employment being on the same site and a request was made that the impact on local residents needs to be taken into account before planning permissions are granted.

One respondent expressed an interest in commenting on any employment allocations in the Local Plan and the need to satisfy the flood risk/ sequential test/ exception test.

A list of areas were proposed as suitable for employment including existing employment sites in the Enterprise Zone (and the Waterside), Brackmills and Lodge Farm as well as former school sites and brownfield sites in Blackthorn, some sites in

West Hunsbury and one site in Towester Road. There were also recommendations to encourage the use of empty shoe factories for culture and creative industry workspace and create a digital hub.

One respondent (not duly made) mentioned that there is a severe shortage of accessible land in the Borough, which may require a joint approach with neighbouring planning authority or strategic land allocation cross border. Northampton may be losing warehousing, manufacturing, light industrial, workshop, offices and related industry jobs – and this is exacerbated by inflexibility in working with a 20 year old plan. Infrastructure constraints within the Central Area are also inhibiting. These challenges constrain private sector involvement and private/ public initiatives are urgently needed. Flexibility needed include extensions of the Waterside Enterprise Zone, a new Enterprise Zone, greater collaboration (eg between Brackmills BID and NBC) and flexibility in the plan to adapt to micro and macro circumstances. The emerging Plan should consider both allocations and protection across the sectors and across the size ranges. Northampton is prime B8/ logistics sector but is also home to a disproportionately large number of micro business, and has no status as a regional office location.

Question 8 – Outside of the Enterprise Zone, are there any other existing employment areas where opportunities could be improved and vacancy rates could be addressed? If so, how could this be achieved?

Question 8 - Overview: Summary Of Responses

5 respondents made comments on Question 8. There was a view that medium to large businesses need to be attracted to Northamptonshire with Northampton being the hub for employees to live. In terms of the locations, there were comments about the Orbital Road system being an obvious choice for businesses to locate to and that employment needs to be focused in particular areas or zones. These areas need to be supported by new highways to facilitate the associated traffic movement.

There was a suggestion that there is evidence of demand for artist studio space/ creative industry workspace and there is an opportunity to capitalise on first and second floors of empty shops or empty shoe factories. Another respondent considers the Enterprise Zone should be a Council priority to bring investment into the town.

Question 9 – Do you think there are any areas within the Borough where certain types of employment development are generally acceptable but which currently require planning permission, which could reasonably be dispensed with through the introduction of a Local Development Order?

Question 9 - Overview: Summary Of Responses

5 respondents responded to Question 9.

One respondent did not support Local Development Orders (LDOs) within the historic core of the town due to the archaeological and heritage potential.

One respondent suggested that LDOs may be possible but only if restrictions such as building height, parking and public transport can still be required.

Other comments included:

- That the town square [Market Square] be leased to a private company so they can hold exhibitions and so on, therefore drawing commerce into the town centre.
- The Hospital should have a teaching arm
- The importance for employment developments to be separated from residential areas.

Question 10 – Please provide details of any particular infrastructure issues in relation to new development which you think the Local Plan (Part 2) should address, if possible providing evidence?

Question 10 - Overview: Summary Of Responses

There were 20 respondents to this question.

All respondents offered a range of suggestions including reference to the Northampton Northern Orbital Route where respondents were seeking assurances that the County Council will provide fully detailed and justifiable proposals, and that the historic character needs preserving and where possible enhanced. Also, clarity is required on how this will be funded under the CIL regime.

Reference was made to the Northampton Growth Management Scheme and the need to engage and understand any pressures that may arise on the strategic road network as a result of additional development sites being identified. There is also a recommendation that where sites are located close to strategic road networks that vehicle trip impacts are adequately addressed. One respondent referred to the Infrastructure Delivery Plan produced to support the Joint Core Strategy and that this may need reassessment depending on what comes forward as part of the Local Plan Part 2. One area of concern, according to the respondent, is that the current policy was formulated in a manner where developers do not have to solve traffic problems outside their development site, and this is highly questionable. The respondent suggested the creation of a Highways Champion to look at the whole picture.

Another respondent identified the need to consider the capacity of water and water recycling infrastructure to accommodate the need for improvements where appropriate. Green, water, wastewater and flood risk management need to be recognised as types of infrastructure required to deliver small scale development and lack of infrastructure planning and time required to implement these could result in environmental limits being exceeded.

There were comments relating to the need to implement primary infrastructure to support the cumulative growth across the Borough, and for more public transport in the evenings south of the town. One respondent suggested a range of measures including prioritise walking and cycling (and make them safe and pleasant choices)/ reintroduce proper regulation of buses/ encourage mix developments/ make low emission zones and viable alternatives to car use available in town and produce a Cycle Delivery Plan. These would massively improve health and provide savings on NHS bills. Another respondent wants cycle routes to be a priority and that the routes should be “studded” so motorists become instantly aware when they drift into a cycle lane.

In terms of requirements, a range of options were suggested including the provision of appropriate sports facilities, additional places of worship (as mentioned in the Council’s Faith Study), encourage space sharing of community buildings and cultural buildings (leading to its multi-use). Extending safer cycling provision including mandatory as requirement within all new roads and road upgrades were also proposed. Also, when consent is considered for new employment, proper account needs to be taken of extra traffic and whether there is infrastructure to accommodate it.

One respondent recommended that any sustainable transport studies should identify key cycle and pedestrian routes to major employment areas, and highlight where deficiencies might be discouraging walking/ cycling to work. Commuters require safe, simple and direct routes to destination and this provision would make a contribution to achieving modal shift.

The following specific infrastructure items were mentioned:

- The Growing Together Neighbourhood Plan calls for the improvement and expansion of the network of foot and cycle paths in the area;
- A new single carriageway, all purpose highway should be built along St Andrew’s Road, following the Brampton Valley way as far as Windhover which will relieve congestion in Kingsthorpe;
- The North West Bypass needs to be built in advance;
- Waterside development needs to use the old rail track from St James to the east and Brackmills industry as an all-purpose highway;
- Off road parking needed at the Racecourse and Abington Park;
- 3 traveller transit sites need to be provided in the north, west and south;
- All industrial buildings must be equipped with solar panels on the roof and the policy should be applied retrospectively;

- Support the reopening of the Northampton – Bedford trackbed;
- Concerned about the proposed St James Link Road as it does not meet the challenge of climate change and flooding, will not conserve/ enhance the historic and natural environment;
- Milton Ham – greenspace around Milton Ham and crematorium must be protected. Protect green spaces acting as buffers. Employment is important but not to the detriment of residents amenities; and
- Ensure transport infrastructure in place in areas around West Hunsbury and making it a no HGV area (except for access), install speed activated traffic lights/ junctions onto through routes.

Question 11 – How do we ensure a successful town centre in light of changes to shopping habits such as increased use of out of town retail and on-line shopping? The Local Plan (Part 2) will not be reviewing the retail growth which is set out in the adopted Joint Core Strategy.

Question 11 - Overview: Summary Of Responses

There were 26 respondents to Question 11 – the second highest response to a question.

In general, most respondents consider that shopping habits have changed and that town centres need to be viewed differently. There need to be more reasons for people to come to the town centre including for entertainment. Also, together with significant technological innovations/ internet shopping, changes in shopping patterns are having a deep and profound impact on UK high streets. The high street is vulnerable because shopping and eating at cafes can no longer be seen as the main attraction of a town centre. The high street must evolve to attract visitors and become a destination which provides experience that is wider than just shopping, promoting leisure and other town centre uses like dining so people have more reasons to come to town. There is a need to increase dwell time and create an evening economy to enliven the high street from day to evening. The recommendation is to encourage greater flexibility of uses to ensure survival of the high street and widen consumer choice. Also, there needs to be recognition of the changes to the Permitted Development Rights.

From a planning policy perspective, one respondent commented that planning policy should recognise the important role that both A3 (food and drink) and D2 (assembly and leisure) can have on improving the town centre offer. The Local Plan should not contain stringent policies restricting main town centre uses within the Primary Shopping Area (PSA). The PSA should remain the priority for investment and therefore, encouragement should be given to a mix of uses and support to changes of use for dining and leisure to enable areas to come back into viable use.

One respondent states that the CAAP designation of Primary Retail Frontage has proved to be a significant barrier for Market Walk Shopping Centre and the

introduction of uses like cafes/ restaurants, etc would make a significant contribution to vitality and viability of the town centre. This would allow Market Walk to be an attractive town centre destination.

Another respondent fully supports the creation of the Cultural Quarter but states that planning policy has not maximised the significant economic and regenerative potential of its cultural and creative sectors. There were a couple of comments on the fact that the Issues Paper did not make any reference to the Cultural Quarter or cultural facilities. It was recommended that the Local Plan should contain detailed policies that define the vision and objectives for the Quarter, to give it identity/ protection and the ability to grow. This will also give the area a focus, a sense of place, distinguishable from other competitive locations and be a catalyst for regeneration and continued success of the town centre. Culture and arts must be a highly visible part of this identity. They need recognition given their role and importance to the continued success of the town centre. One respondent noted that the cultural quarter was clearly signposted in the town centre but not mentioned in the current Local Plan. It was suggested that this be addressed in the new Plan, by providing clear recognition given its role and importance to the continued success of the town centre. Northampton has the potential to play on the strength of its cultural assets to drive economic regeneration

Another respondent commented that there is a need to rethink what the town centre could be. Northampton could be at the forefront, with a mix of destination and independent shopping/ workplaces/ culture. St Giles Street being a good example, which could be extended to the rest of the town. There are good models of creative industry/ cultural business working with retail where offices and artist space co-exist.

To assist, several respondents provided the following suggestions to improve the town centre:

- There is a need for quality outlets/ higher end businesses to be attracted to the town centre. The current trend of charity shops, wine bars and 99p shops is not considered to be building a character of the town;
- The town centre needs to be attractive and safe. It could be supervised directly by security personnel and video surveillance;
- Provide regular, free shuttle buses from Park & Ride zones (eg Sixfields/ Railway Station) to keep town centre traffic free although there is an acknowledgement that recent changes to shoppers parking has helped;
- Reduce access to alcohol especially at night by having earlier club/ pub closing times;
- Encourage reversion of unsuccessful shops to employment or residential;
- Reintegrate bus and coach stations into one site and ensure regular rapid links to and from Castle Station until at least 10 pm;
- Extend associated secure and covered cycle parking facilities across the town especially bus and train stations/ park and ride/ town centre etc;
- Create more homes in the town centre to stimulate economic activity with flexible approaches to ground floor uses, making them adaptable to the needs of the market;

- Limit takeaways/ restaurants allowed in one street due to public health;
- Limit off licences;
- Town centre recognition of the shoe industry would benefit businesses like restaurants and restore historic buildings; and
- Improve Northampton market and enhance Market Square to reflect its historic significance.

Question 12 - Are there areas where the location of betting shops and hot food takeaways should be restricted?

Question 12 - Overview: Summary Of Responses

8 respondents commented on this question.

Respondents suggested that the following locations should be restricted for betting shops and hot food takeaways: near schools, public houses, residential areas, around the Cultural Quarter, in areas already with concentrations of these uses like Abington Square and top of York Road (no more than 3 within 100 metres), the Town Square and main shopping/ parking route. Efforts should be made to encourage restaurants and other “up market” facilities.

One respondent states that the clustering and proliferation of these uses on the high street is a key planning issue because they can negatively impact on the vitality of shopping areas if not adequately controlled. Their locations could be the secondary frontages. Policy should require evidence to be provided for change of use to betting shop and hot food takeaways within the Primary Shopping Area to justify the use. Another respondent considered that excessive fast food and off licence shops should be avoided along Wellingborough Road, that the number of bars should be reduced and the sale of alcohol/ opening times restricted.

Question 13 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance areas of biodiversity in addition to the policies in the NPPF and Joint Core Strategy?

Question 13 - Overview: Summary Of Responses

There were 15 responses to Question 13 on biodiversity.

8 respondents considered that there should be a policy to protect and enhance areas of biodiversity compared with 5 respondents who considered that there was no need. Those who did not support a specific policy considered that there was adequate and flexible protection through the NPPF and the WNJCS. The need to avoid repeating

or doubling up on policies or statutory designations or existing protections such as the Protected Species Regulations was noted.

Places identified for protection and enhancement:

Abington Park	School Playing Fields	Duston Wetlands
Sixfields	Allotments	Quarry at Duston Wildes
Reservoir on A5199 / Windhover Area	Dallington / Harlestone Heath	Upper Nene Gravel Pits SPA
Bradlaugh Fields	Storton’s Pits	Parks

Suggestions to enhance included:

- Making space for trees and hedges to encourage wildlife by defining boundary zones e.g. 5m to 10m
- Identifying and retaining areas of natural special interest including geological interest and locally important habitat types. These could form part of a special protection programme or be highlighted as areas where biodiversity needs enhancement
- Planting trees including fruit tree on land that cannot be developed e.g. former tips

Other comments included:

- Whether the Council would make funds available to invest
- Concern about development too close to the River Nene affecting the naturalisation of riverbanks which contribute to biodiversity and ecological status
- Cautioned against a one size fits all approach to areas needing biodiversity enhancement
- Highlighted that businesses need to understand how they can meet sustainability objectives
- Noted the risk of recreational disturbance to the Upper Nene Gravel Pits SPA

Question 14 - Do you think there are priority areas where green infrastructure networks could be enhanced or extended?

Question 14 - Overview: Summary Of Responses

There were 13 responses to Question 14 on green infrastructure.

12 respondents suggested possible priority areas where GI networks could be enhanced or extended or potential networks and ways in which these could be improved.

Suggested Priority Areas:

- Bradlaugh Fields
- Upton Country Park

- Hunsbury Hill

Potential Networks:

- The Nene Valley Nature Improvement Area (NIA) was suggested for inclusion as a local policy that could identify opportunities for delivering improvements to the NIA through GI provision
- The Green Infrastructure Plan was noted as identifying projects representing a range of GI enhancements
- The greenway through town centre and the River Nene as a blue / green network leading to the Upper Nene Valley Gravel Pits SPA
- Ensure networks that link with the SUEs on the edge of Northampton are sufficiently provided for
- Create linear parks along walkways and cycle-ways
- Accessible Natural Greenspace and sustainable transport routes could support network identification
- Sustainable transport routes should inform locations for GI enhancement

Other comments included:

- The need for the Local Planning Authority to work collaboratively to ensure strategic priorities are properly co-ordinated and clearly reflected in individual Local Plans
- The need to review the information provided on active design (Sport England planning tool and guidance)
- Contributions towards habitat enhancement should be explored where housing allocations are located in the NIA
- Planning positively for ecological networks will contribute to the creation, protection, enhancement and management of GI
- Planting in amenity green spaces that creates a more natural feel
- Reference to an emerging Neighbourhood Plan which proposes 11 Local Green Spaces and which enhances quality, amenity value and community use

One respondent cautioned that if the Council is considering Local Green Space designations in the Local Plan it should not automatically transfer sites previously designated in the Local Plan 1997. There should be a detailed assessment of all sites which is subject to public consultation so sites are considered on individual merit and to see if a continued designation is justified.

Question 15 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance heritage in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy?

Question 15 - Overview: Summary Of Responses

There were 12 responses to Question 15 on heritage.

6 respondents supported having a locally specific policy. There was a view that locally important areas, eras of history, historic assets which are not in conservation areas or assets that may not be listed or designated should be identified through policy. Reasons for this approach included:

- Information for developers who could plan schemes accordingly to avoid delayed completion dates and increasing development costs
- Policy should cover desk based assessments, geophysics and trial trenching
- To implement strategic Policy BN5 on a local level by protecting, conserving and enhancing these historic assets that contribute to the history and story of Northampton
- Developing a strategy for the historic environment should correlate with other policy areas which should consider the issues relating to conservation and enhancement

Other comments

- The need to consider the impact of discovering heritage assets during construction
- That planning applications should be based on appearance and blending as well as functionality
- Supporting the Plan by a townscape assessment to support an innovative and proactive approach to the use of scale, massing, colour, etc
- Increase legal protection and enhance understanding appreciation and care of historic assets
- Concern about Northampton's record on heritage citing several examples including the loss of our heritage as a Market Town
- Important areas and eras of history included agricultural history, history of navigation, development of shoe making and associated industries, brewing, protect local farm buildings from their pre-development past

The remaining comments were of the view that the NPPF and WNJCS provided an adequate framework and the Local Plan needed to avoid repeating or doubling up on policies or statutory designations or existing protections like Listed Buildings under the Planning (Listed Buildings and Conservation Areas) Act 1990.

It was noted there should be sufficient flexibility to enable the conversion and re-use of listed buildings. Sometimes this may only be financially viable through 'enabling' development and Local Plan policies should allow the flexibility for such development to be brought forward

Question 16 - Should the Council review the list of locally listed assets of historical importance?

Question 16 - Overview: Summary Of Responses

There were 9 responses to Question 16 on reviewing the list of locally listed assets. 8 respondents considered that the Council should review the list of locally listed assets of historical importance and one said probably. It was suggested there should be an on-going plan of regular reviews to keep the list up to date e.g. 10 yr full review, 5 yr smaller review. Reasons for reviewing included:

- The list is integral to any meaningful townscape assessment
- To protect locally listed assets of importance
- To ensure the status of the locally listed assets are still relevant
- To identify non-designated assets which offer insight into the Borough's heritage enabling their special interest to be reflected through planning schemes

Other comments included:

- Documentation for Northampton's historic environment is incomplete; an investigation and analysis of upstanding and buried physical remains would help fill the gaps
- The local list should link with NCC's Historic Environment Record and the 'Grey Literature' reports and be publically available. This would assist officers, the public, developers, etc.
- The local list needs to be extended, too much has already been lost

Question 17 - Do you think there are locally important landscapes which should be identified in the Local Plan (Part 2)?

Question 17 - Overview: Summary Of Responses

There were 11 respondents to Question 17 on identifying locally important landscapes.

8 respondents supported the identification of locally important landscapes and identified potential locations. 2 respondents did not support identification and 1 respondent requested a review of an existing locally important landscape designation. Potential locally important landscapes included:

Large scheduled monuments e.g. Hunsbury Hill	River Nene River Valley and its tributaries	The Saxon core of Northampton, esp area around Gregory Street
Freeschool Street, St Peter's Street and Green Street	Medieval cores of Northampton and the villages	Site of Northampton Castle
St Andrew's Hospital site and grounds	Nene Valley and the ridge ending at Hardingstone	Fields around back of Brackmills and Great Houghton

Billing Road Cemetery	Conservation Areas	Locally important routes / trackways e.g. Roman Portway path from Town Centre to Hardingstone
Express Lift Tower	Quarry in Duston Wildes	All parks
West Hunsbury Parks	Abington Park	Delapre Park and Battlefield
Upton County Park	Route through Hunsbury to the lakes and Sixfields	

Comments included:

- Designation would enable leisure development, assist with planning applications and encourage future management
- Townscapes are as important as landscapes e.g. Boot and Shoe Quarter with terraces and prominent corner buildings. Take account of topography and consider eye-lines. Identify:
 - locally important views e.g. of the lift-tower from a distance of 1 mile or more; view of Delapre Woods from top of Bridge Street
 - other landscape features e.g. routes and trackways of historic and amenity value
 - distinctive architectural patterns e.g. the jetties

Of the respondents who did not support identifying locally important landscapes one respondent stated that important landscapes had long been destroyed and the other noted that each application should be judged on its merit and where appropriate include a landscape appraisal.

Question 18 – How do we ensure that new development preserves and enhances the character and appearance of the Borough and makes a positive contribution?

Question 18 - Overview: Summary Of Responses

There were 13 responses to Question 18. A variety of comments were made, these have been summarised under by theme:

- **Developing a policy approach:** Prescriptive policies should be avoided, use a general policy with emphasis on the developer demonstrating integration with justification for design proposals; need strong policies for improving the streetscape which include street furniture and signing, shop fronts, road and paving materials and guidelines on clutter; enable a flexible and holistic approach to imagination and innovation; respect the local vernacular, character, distinctiveness and appearance of the Borough; require high quality design and materials that respond to place and urban design, layout and

building styles that include reference to it; consider spaces between the buildings; 'Build' open spaces into new development; protect and maintain existing open spaces; manage spaces according to the character of area rather than a standard approach to all; revert to traditional housing & building form.

- **Practice:** Resist uninspiring schemes and positively encourage those incorporating the local vernacular into their design; Encourage beneficial regeneration utilising the heritage dividend; undertake public consultation before decisions are made; Use a townscape assessment and allow developers scope over design where there is no defined context, e.g. peripheral SUEs; Allow developers flexibility in meeting design requirements to ensure viability and avoid uniform developments / personal preference in design / appearance; could use National Character Areas to provide a useful planning tool to guide the design of projects; New buildings should be distinctive on their own contributing to new architectural styles and conservation areas of the future; Planting should be an all year round interest that uses permanent successional planting to attract insects. Avoid monocultured grass, sow mixes of long meadow grasses with wildflowers.
- **Data collection and monitoring:** Regularly undertake Conservation Area reviews to record the changing character of particular areas; Complete an Urban Archaeological Database (UAD) Strategy using existing UAD held by the Northamptonshire's Heritage Environment Record (HER) to protect Northampton's best urban historic assets; compile full archaeological survey of Northampton Battlefield.
- **Education and training:** Conservation Officers should receive training from Historic England. Encourage Planning Officers to undertake an urban design course.
- **Professional support:** Follow advice of County Council Archaeological Advisor on planning applications; buy qualified architect services when needed.

Question 19 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to promote measures within new development to address climate change and renewable energy in addition to the policies in the Joint Core Strategy?

Question 19 - Overview: Summary Of Responses

There were 14 responses to Question 19 considering locally specific policy regarding climate change and renewable energy. 7 respondents supported a policy to promote measures within new development and 4 respondents did not. Those supporting a locally specific policy made the following comments:

- All housing developments currently progressing through the planning process and using 2013 Building Regulations should be required to achieve energy equivalent of Code for Sustainable Homes Level 4; Developers should be encouraged to build with energy efficient materials and in an eco-sustainable way;
- Make solar panels mandatory on all new builds (including Council and social housing stock) and housing extensions; Retrofit solar panels on schools, warehousing, retail parks, etc;
- Consider wind technology;
- Consider sustainable transport options; encourage greater use of electric vehicles; fit Town Centre charging points; lead the way in town planning by becoming a sustainable vehicle town;
- Develop a green roof policy;
- Take advantage of underutilised urban spaces - provide multifunctional benefits through flood management, biodiversity, climate change mitigation and managing the heat island effect; and
- Manage domestic and industrial grey water and recycle rather than putting this grey water down the drains.

The other responses expressed concern about the impact such a policy might have on viability and deliverability. It was suggested that such requirements should be left to Building Regulations. Other comments included:

- The policy should not be so restrictive as to fetter the conversion or re-use of an existing building
- Such requirements affecting scheme viability could affect affordable housing provision and planning obligations
- There is concern over how the policy could be monitored over time
- Sustainability and long term adaptability are key to the development of proposals for sites

Question 20 – Should we review and incorporate existing Interim Planning Policy Guidance (eg. Affordable Housing, Houses in Multiple Occupation, etc) into the Local Plan (Part 2)?

Question 20 - Overview: Summary Of Responses

There were 9 respondents to Question 20.

3 respondents commented on HMOs themselves, responses included that HMOs tend to have a negative impact on the local area, are a social nuisance and change the cultural make up of an area, for instance in areas like Semilong and the Mounts. One respondent suggested that HMOs should be banned.

2 respondents commented that HMO policies should be consolidated into the statutory development plan, in the spirit of the National Planning Policy Framework. However, another 2 respondents state that including interim guidance in the Local Plan would make them inflexible to changing circumstances and that they should sit outside the Local Plan and be regularly reviewed. 1 respondent considered that the guidance should be strengthened.

Question 21 - Are there any other issues that the Local Plan (Part 2) needs to consider?

Question 21 - Overview: Summary Of Responses

There were 18 responses to Question 21 relating to other issues the Local Plan (Part 2) should consider. Most had independent and separate issues from each other which have been set out in the list below:

- Concern that the 2029 plan period will not provide a 15 year horizon by the time it is adopted in 2018
- Consider impact of new development like Rushden Lakes and the Blisworth Strategic Rail Freight Interchange proposal
- Refuse & Recycling
- Designing out crime; strategic security policy (include something more akin to Policy E40 (NLP) than Policy S10 (JCS))
- Merge CAAP with Local Plan (Part 2); regeneration and restoration of existing buildings in the Town Centre; review Town Centre Article 4 Direction; develop retail strategy for Town Centre to encourage specialist and independent sectors
- Give support to development of existing education institutions, associated employment opportunities and the learning infrastructure; Provision of local schools
- Infrastructure before expansion
- Nene Valley Nature Improvement Area - deliver the sustainable regeneration of the river corridor including GI that contributes to protecting and enhancing water bodies and policies that promote GI in new development
- Include Borough wide ecological map to illustrate overview of biodiversity assets
- Gardens should be identified as greenfield land to avoid over intensive development
- All open space designations to be reviewed and assessed to determine if they are still relevant in the context of housing need
- Take Saved Local Plan Policy L24 (allotments) forward into Local Plan (Part 2)
- Play facilities required between Billing Rd and Wellingborough Rd;
- Duty to cooperate where cross boundary environmental risks and opportunities are best considered at a larger than local scale

- Flooding
 - Attenuation storage is required including at Brampton Branch and St Peter's way, Becketts Park, Avon Nunn Mills and Ransome Road, South Bridge West and Nene Meadows and upstream between Weedon and Kislingbury
 - Include policies that avoid inappropriate development in floodplains
 - Maximise opportunities to reduce flood risk through regeneration and redevelopment
 - Take account of residual risk associated with flood defences
 - Water cycle study needs updating
- Water quality needs to consider rural / agricultural land management (given Northampton's rural surround); drainage misconceptions and polluted surface water run-off. River restoration is a key issue
- Safe cycle and pedestrian routes
- Avoid excessive numbers of off licence shops along Wellingborough Road
- Policy on air quality given the AQMAs; recharging points for electric / hybrid vehicles and low cost, preferential parking for these; on-street parking spaces reduced to encourage smaller vehicles, larger vehicles pay for two spaces
- Health and well-being needs to be identified as a key priority supported by a specific policy to make explicit the role of planning to improve these factors; medical facilities for the growing and aging population
- The Sustainable Urban Extensions (SUEs) could be exemplars for health and well-being through high quality design and innovative approaches
- Consider further the issue of phasing of development in relation to waste water treatment capacity

CENTRAL AREA ACTION PLAN (CAAP)

Question 22 - Flood Risk and Drainage (Policy 5) - is this policy still appropriate and up to date in relation to the Drainage Plan Part 1?

Question 22 - Overview: Summary Of Responses

There were 5 responses to Question 22 relating to the CAAP Policy 5 (Flood Risk and Drainage). The general consensus was that the Policy was still relevant but required updating. The West Northamptonshire Level 1 Strategic Flood Risk Assessment (SFRA) (February 2009) and Northampton Level 2 SFRA (February 2010) should be reviewed with respect to flood mapping and modelling. Climate change guidance has been updated; the impacts of this on the SFRA will need to be considered.

Specific individual comments are set out below:

- Building on flood plains is questionable e.g. 41 units to be built on the A5199 just outside the Town boundary
- Clear and upgrade existing watercourses, ditches etc; most problems are due to indiscriminate backfilling, or failure to maintain them properly
- Upgrade all drainage/ main sewerage to cope with 1/ 200 year storm events. Force developers to install these off-site where necessary
- Existing developments will require retrospective installation, this could be conditioned on applications for change of use or alterations
- Implement grey water re-cycling to reduce demand for potable water, and reduce volume discharged
- Drain roof-water to tanks before discharging into storm sewers to attenuate flows
- Consider an additional policy that takes account of the findings of the Drainage Plan for the Central Area

Question 23 - Inner Ring Road (Policy 6) - is the proposal for the Inner Ring Road still appropriate and up-to-date?

Question 23 - Overview: Summary Of Responses

7 respondents responded to Question 23 regarding the Inner Ring Road and the responses provide different perspectives on the Inner Ring Road (IRR).

One respondent considers that the IRR is a fragmented combination of many roads/ traffic lights/ pedestrian crossings and does not flow as a ring road. The respondent considers an outer orbital road system to be effective in allowing traffic to pass around the town and not through it. One respondent considered that the IRR is definitely appropriate. Another respondent considered that the aims are acceptable but updated traffic counts needed to check whether growth is in line with predictions and whether the aims as stated are achievable.

One respondent considered that the policy needs updating to reflect changes in the circumstance since the CAAP was adopted. It was recommended that the Northampton Town Centre Transport Strategy should be updated at the same time and that it should form a key part of the evidence base.

There was a suggestion that walking and cycling should be prioritised and that they should be made safe, convenient and pleasant choices.

One respondent referred to the new University of Northampton campus which will drastically increase pedestrian and cyclist crossing at St John's car park exit onto Victoria Promenade across to Becket's Park. There were safety issues here and a new shared surface crossing will help reduce the perceived importance of vehicle traffic and enhance the connection to the Cultural Quarter to Becket's Park and the

University. It was recommended that a separate paragraph be added to CAAP Policy 6.

Question 24 - Safeguarded Public Transport Route (Policy 8) – is the proposal for a public transport / cycling / walking route still appropriate and up-to-date?

Question 24 - Overview: Summary Of Responses

Although Question 24 relates to the Safeguarded Public Transport Route some respondents commented on transportation and movement on a more general basis. There were 10 respondents in total.

One respondent considered that the safeguarded route constitutes an essential piece of infrastructure for the town and two respondents said the policy should be updated to ensure delivery/ and to reflect changes in circumstance since the CAAP was adopted. Another mentioned that the route should be better preserved as a railway and that there is a need to invest in trains to bring it back into use. Or, now that the rails have been removed, it should be brought back into use as a public transport route. One respondent directed the Council to a website which explains how the design element should be taken into account when planning for sports related facilities.

The more general comments include the point that cycle routes are inadequate, and that more usable and well-lit cycleways are needed. To assist cyclists, cycle routes should be a priority and these routes should be studded so motorists become instantly aware when they drift into a cycle lane. One respondent gave a generic overview of prioritising walking and cycling, making them safe and convenient choices, together with road danger reduction approaches. A variety of measures were recommended: reintroduce deregulation of buses, mix developments, low emission zones, viable alternatives to cars in the town, produce a Cycle Delivery Plan. One respondent commented on the fact that the current bus station is an example of poor planning because it is too small and should be next to the railway station. It is not encouraging people to leave their cars at home and catch the bus. The same respondent referred to the layout of Northampton and surrounding villages which mean that people still use their cars. There is a need to encourage walking, cycling and motorcycling, and that the Norbital cycle path and Brampton Valley linear park are a bonus to the town. One respondent considered that buses need to be smaller.

One respondent made reference to the Growing Together Neighbourhood Plan and its requirement for the improvement and expansion of the network of foot and cycle paths in the area. Another respondent considered that the Northampton Town Centre Transport Strategy should be updated and be used to update a key part of the transport evidence base to support the new Local Plan.

Question 25 - Pedestrian and Cycling Movement Network (Policy 9) – should this policy be updated to link to the County Council’s Smart Corridors initiative? Are the identified routes into and across the town centre still up-to-date?

Question 25 - Overview: Summary Of Responses

7 respondents commented on Question 25. Some comments were similar to comments already made to other questions. There was a general consensus that there is a need to prioritise walking and cycling (for work and for leisure) and cycle routes which can be distinguished from the roads, allowing motorists to be aware when they stray into cycle lanes.

One respondent considered that the policy needs updating to reflect changes in circumstances since the CAAP was adopted and that the Northampton Town Centre Transport Strategy also needs updating. Another respondent referred to the Growing Together Neighbourhood Plan and the requirements for the improvement and expansion of the network of foot and cycle paths in the area.

Question 26 - Parking (Policy 10) – should the Council identify more car parks within the town centre and if so, where should they be?

Question 26 - Overview: Summary Of Responses

There were 8 respondents to Question 26.

Some respondents considered that the current multi storey car parks are a blot on the landscape and that they are concrete jungles which are poorly maintained and unsafe, and some car parks are too far from where they are needed. One respondent stated that the policy appears punitive by restricting parking without offering realistic alternatives such as enhanced public transport. Another respondent stated that the policy and evidence base need updating to reflect the changes in circumstance. There was one respondent who said there is a reasonably good provision with the exception of the hospital although there is recognition that effort to address this has been made through the new upper level visitor car park.

Some suggestions include the provision of more parking spaces (reference was made to the Old Barclays site), prioritise walking and cycling, reduce dependence on cars and use existing ground level parks like Sixfields and Midsummer Meadow with efficient free shuttle service with trams and overhead pods. Park and ride should also be considered.

Question 27 - Improving the Retail Offer (Policy 13) – this policy needs to be

updated due to changes in Government policy such as the extension of permitted development rights. Do secondary frontages still need to be identified?

Question 27 - Overview: Summary Of Responses

There were 5 respondents to Question 27. There was a general consensus that the policy should be updated in the light of changes of use of town centres. The following were suggestions for the retail frontages:

- Secondary frontages should be used for preserving a mix of uses for a healthy variety instead of specifically preserving retail use (eg at least 60% retail or no more than 30% of ground floor frontage to be any single non-retail use class)
- Remove the 80% of the Use Class A1 (under the Town and Country Planning (Use Classes) Order 1987 (as amended) retail frontage cap and the restriction on the number of premises not being under class A1. These restrictions can result in units remaining vacant even though there is demand for other uses. Secondary frontages still need to be identified in the CAAP to maintain the distinction between the function of different parts of the town centre and how they contribute to its overall vitality and viability
- Some uses are less desirable in the Primary Shopping Area like hot food takeaways and betting shops
- There might be a case for the town's Conservation Areas Article 4 Directions to be reviewed in light of the extensions to the Permitted Development Rights
- Making improvements to retail frontages has been a great success on St Giles Street. This demonstrates that retailers can retain individual character whilst creating a smart and coherent look. Other frontages which could benefit from the same treatment include Gold Street, Bridge Street, Abington Street, Wellingborough Road. Currently, these streets do not have the appearance of a lively town capable of attracting residents, workers or visitors

From a more general perspective, there was a recommendation that the architectural quality of shops be improved and that the recent award for St Giles Street is a good start. This needs extending to other streets including secondary frontage. To compete with Milton Keynes and Market Harborough, the whole package needs to be in place and not just one street. There was also a suggestion that a major commercial initiative is required to attract appropriate retail giants to the town, and this this should be politically free and involve local experts and residents.

Question 28 - Meeting Retail Capacity (Policy 14) – do we need a more up-to-date retail capacity study to ensure that this policy is up-to-date?

Question 28 - Overview: Summary Of Responses

There were 6 respondents who responded to Question 8.

One respondent pointed out that the retail capacity requirements set out in Policy 14 of the CAAP are inconsistent with the retail requirements of the JCS. The same respondent also referred to Question 11 which states that retail growth will not be reviewed, so it is unclear as to the intention of Question 28. Clarity is required on whether a new retail study will be commissioned or whether the retail study for the West Northamptonshire Joint Core Strategy Local (Plan Part 1) will be used as a guide. The respondent considered the figures to be out of date and that a revised policy should state that retail capacity will be reviewed on a regular basis setting out a clear timescale for clarity.

One respondent commented that retail capacity is not the issue, rather, it is about ensuring and directing better use of existing capacity. There is a need to look at existing architecture facades above shopfronts and force these to be more sympathetic and in keeping with the standards. Another respondent stated that more retail space was not needed as the internet is likely to power ahead for the foreseeable future.

One respondent questioned whether the Council has resources and expertise to deal with the issue. The respondent considered that the policy should be supported by a vision, strategy and serious plans to be effective.

Question 29 - Office and Business Uses (Policy 15) – this policy needs to be revised due to changes in Government policy. Should we identify land for new offices within the town centre? How should the Council seek to safeguard existing office space, especially in light of recent and proposed Government changes regarding permitted development rights?

Question 29 - Overview: Summary Of Responses

6 respondents commented on Question 29. One of which was not duly made as it was received after the consultation had closed.

There was an agreement that more business activity should be encouraged into the town centre and that office space in the town centre should be expanded to facilitate wider investment. This could be achieved in the following ways:

- Encourage offices, smaller and new start-up businesses into the town centre to stimulate visitors and improve retail footfall
- Non-residential vacant buildings should be given priority for business use

There was a suggestion that the town centre requires a healthy and balanced mix between daytime and night time experience. In the daytime, there is a need to attract more commerce and create a dynamic ancillary business culture (eg restaurants and fast food outlets for workers). At night, there is a need for a vibrant,

safe entertainment culture which attracts visitors and residents to fill the void left by daytime commerce. There were comments about needing smarter pubs and restaurants as well as better consideration of parking facilities and refocus on the drinking culture.

One respondent asked for caution to be exercised by updating existing evidence base (West Northamptonshire Employment Land Study 2010 and Northampton Employment Land Study 2006) before deciding whether there is a need to identify land for new office space within the town centre. It was considered that there should be an assessment of both the requirement and the quality of existing office stock before a safeguard is put in place. Reference was made to the Northamptonshire Local Economic Assessment 2015 which concluded that office market in Northamptonshire is small compared to areas like Milton Keynes.

One respondent (not duly made) stated that flexibility is needed with the pace of change in other sectors (retail, leisure, offices, education, service industries, voluntary sectors) with an accelerating phenomenon. Large parts of the town centre could be transformed into a simplified planning zone with market led allocations of land/ space at one end of the scale and protection for micro businesses at the other. The respondent considered that mixing and integrating space uses is more holistic and sustainable. Mixed use scheme at Greyfriars would assist. There are benefits with the greater public/ private initiatives, micro economic circumstances and various regeneration projects. The Local Plan will need to allow for far greater private sector involvement. There is a need to underline Unique Selling Points, provide a forum for residents/ businesses/ visitors and increase profile of the new Plan and Northampton itself.

Question 30 – Do any of the site specific policies need updating? Please indicate which policies and provide details if possible (Policies 18-35).

Question 30 - Overview: Summary Of Responses

There were 4 respondents to Question 30 on whether site specific policies in the CAAP needed updating with the following policies being identified:

- Policy 18: Is retail appropriate for the Library? Character and use of upper Abington Street has changed significantly
- Policy 20: St Johns - The student accommodation and hotel have been provided but preclude the restaurants, cafes, active frontage, enhanced pedestrian routes and public space. Creative planning is needed to turn this service area round
- Policy 21: Angel St – the new development does not provide a public route through or significant public square. It needs to be re-planned to be an attractive, well used-public area
- Policy 28: Avon / Ransome Rd / Nunn Mills needs radical review to take account of Waterside Campus

- Policy 29: Waterside: Becketts Park - Originally devised for housing but site is now university campus. Many elements of the policy remain the same but specific consideration needs to be given to the role of Becketts Park
- Policy 31 (Market Square) amend to allow greater flexibility for restaurant uses at Market Walk Shopping Centre.
- Policy 32 Drapery has significantly changed in character now the bus 'station' has expanded along the length of it. The area needs remedial planning to solve the problems of people queuing in too small a space which restricts pedestrian movement
- Policy 33: Freeschool St should be updated. Remove aspiration to redevelop for office use (B1) with small scale retail. The site is not viable for this and should be redeveloped for primary residential use of appropriate scale and density for its location
- New sites will need to be informed by an up to date Water Cycle Study and Strategic Flood Risk Assessment (SFRA).

Question 31 - Please provide details of any other policies in the Central Area Action Plan which you consider the Council should reassess to ensure that they are up-to-date, if possible providing evidence.

Question 31 - Overview: Summary Of Responses

4 respondents commented on this question. The comments were:

- There was scepticism towards the “flawed bus station concept” and the “mythical Grosvenor Centre improvement” and the fact that the train station needs further work particularly in relation to accessibility for the disabled
- There was a query as to why there has been no transport hub to encourage wider use of public transport and noted the omission of a plan which brought together the train and bus stations
- The Freeschool Street site should be removed from CAAP Policy 15
- There is a need for creative planning and planning for empty spaces. It was acknowledged that there had been some initiatives such as Collective Collaborations and the University/ Made in Northampton/ Screen Northants. However, these were considered to be ad hoc and difficult to negotiate and organise. With the University moving to the town centre, there is an opportunity to create spaces for students to use alongside culture and creative industries. There are discussions about the potential for the County to be the Capital of Culture for 2021
- There should be some new public realm activity or planning for new spaces
- Riverside development offers the opportunity to think creatively about the public realm

GLOSSARY

AQMA	Air Quality Management Areas
BID	Business Improvement District
CAAP	Central Area Action Plan
CIL	Community Infrastructure Levy
DPD	Development Plan Document
EZ	Enterprise Zone (Northampton Waterside)
GI	Green Infrastructure
HMO	Houses in Multiple Occupation
IDP	Infrastructure Delivery Plan
IPPG	Interim Planning Policy Guidance
IPPS	Interim Planning Policy Statement
LAA	Land Availability Assessment
NLP	Northampton Local Plan (Plan 2)
NBC	Northampton Borough Council
NCC	Northamptonshire County Council
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NRDA	Northampton Related Development Area
SCI	Statement of Community Involvement
SHLAA	Strategic Housing and Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SUDs	Sustainable Urban Drainage
WN(JCS)	West Northamptonshire Joint Core Strategy Local Plan (Part 1)
WNJPU	West Northamptonshire Joint Planning Unit

APPENDIX 1

Index of Respondents

Responses Submitted by Website
Debbie (No family name provided)
Tesco
Sport England
Northamptonshire Archaeological Society
Growing Together Neighbourhood Forum
Alan Earle
WASPRA (email duplicate received)
Favell Gospel Hall Trust
Environment Agency
David Huffadine-Smith
Responses Received by Email/Post
Aylesbury Vale District Council
CC Town Planning
Historic England
Bovis Homes
Northampton Town Centre Conservation Areas Advisory Committee
Highways England
Natural England
Lisa Bradshaw
David Wilson Homes
Northamptonshire County Council (Ecologist)
NN Contemporary Arts
Martin Grant Homes
Davidsons Development Ltd
Natural England
South Northamptonshire Council
English Regional Transport Association
UGS and Market Walk
Tom Higginson
Moulton College
Northamptonshire County Council (Public Health)
Mr & Mrs Cadman
Daventry District Council
Environment Agency
Sandra Guest (West Hunsbury Parish Council)
Martin Bagshaw (Northamptonshire ACRE) – PRINCIPAL RESPONSE
University of Northampton
Northamptonshire Police
Andy Clarke
Persimmon Homes Midlands
Green Party
Northampton Shopping Centre Limited Partnership
Rentplus
Ballantyne Carmichael
Hardingstone Parish Council

Northamptonshire County Council
Dr R Alexander (Lib Dems)
Clayson Country Homes
University of Northampton (Institute of Urban Affairs)
Not Duly Made Responses (Late)
Brendan Bruder (Abbey Ross/ Northampton BID)

APPENDIX 2

Number of Responses Received by Issues Paper Question

Question from Issues Paper	Number of Responses Received
1	27
2	16
3	17
4	18
5	11
6	9
7	12 (one was not duly made)
8	5
9	5
10	20
11	26
12	8
13	15
14	13
15	12
16	9
17	11
18	13
19	14
20	9
21	18
22	5
23	7
24	10
25	7
26	8
27	5
28	6
29	6 (one was not duly made)
30	4
31	4

APPENDIX 3

Consultation & Engagement Strategy for the Northampton Local Plan (Part 2) Issues Consultation (Approved by Northampton Borough Council Cabinet on the 13 April 2016)

The Consultation and Engagement Strategy sets out the proposed arrangements for communication and consultation with the local community and all other stakeholders in respect of the Local Plan Issues consultation. The strategy meets the statutory requirements, as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and the draft Northampton Statement of Community Involvement.

Timing	Actions
<p>April 2016 (Before the consultation)</p>	<ol style="list-style-type: none"> 1. Local Plan Newsletter for all Borough councillors to provide briefing on the Issues consultation including overview of content, consultation actions and timetable. 2. Two press releases: <ol style="list-style-type: none"> a. one just prior to the Cabinet papers being made public, i.e. around Monday 4 April prior to dispatch on 5 April b. one just prior to the start of consultation, i.e. around Mon 25 April prior to start of consultation on 27 April 3. Social media communications on the Council’s Twitter and Facebook. 4. Design Flyer/ Leaflet for external use, for example in Community and Leisure Centres.
<p>27 April – 10 June 2016 (During consultation)</p>	<ol style="list-style-type: none"> 5. All Issues consultation documents to be made available at the Inspection locations (the One Stop Shop at the Guildhall and all libraries in Northampton Borough). 6. All Issues consultation documents to be made available for review/ download with on-line response facility available on the NBC website. 7. All letters or emails explaining the Issues consultation and providing details of how to respond sent to specific consultation bodies¹, the general consultation bodies²,

¹ The specific consultation bodies are listed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and relate to organisations responsible for services and utilities and infrastructure provision.

	<p>neighbouring authorities, prescribed bodies³ and other organisations and individuals as appropriate.</p> <p>8. Paper copies of consultation documents to be made available at Parish Council and other community offices where possible</p> <p>9. Paper copies of Issues consultation documents to be made available on request.</p> <p>10. Issues consultation workshop for all Borough councillors.</p> <p>11. Issues consultation workshop for all Parish Councils and Neighbourhood Forums in Northampton Borough.</p> <p>12. Issues consultation documents to be made available at The Guildhall during the consultation period – staff available at designated times to answer questions/ provide advice.</p> <p>13. Meetings/ briefings to be arranged with key organisations including statutory bodies.</p> <p>14. Information boards to be made available at The Guildhall and at various locations across the Borough.</p>
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² The general consultation bodies are also specified in Regulation 2 of the 2012 Regulations and comprise:
voluntary bodies some or all of whose activities benefit any part of the local planning authority's area
bodies which represent the interests of:

- different racial, ethnic or national groups in the local authority's area
- different religious groups in the local planning authority's area
- disabled people in the local planning authority's area
- persons carrying on business in the local planning authority's area

³ The prescribed bodies are specified in Regulation 4 of the 2012 Regulations (as amended) and in the case of Northampton are:
Environment Agency, Historic England, Natural England, Civil Aviation Authority, Homes and Communities Agency, NHS, Office of Rail Regulation, Highways England, Northamptonshire County Council Highways, Northamptonshire Enterprise Partnership, South East Midlands Local Enterprise Partnership, Northamptonshire Local Nature Partnership

APPENDIX 4

Workshops for Borough Councillor, Parish Councillors and Neighbourhood Forums

All Borough Councillors were invited to a workshop on 03 May 2016 to receive a briefing on the Local Plan process and timetable and to discuss issues identified.

Four Borough Councillors attended this workshop. A range of issues were discussed including:

Housing:

- HiMOS – can we build good quality, purpose built single person homes?
- Also need family housing and housing for older people.
- Price of housing
- Can Local Plan encourage/prioritise brownfield sites eg St Edmunds?

Infrastructure

- For students eg cycle paths, lighting, car parking?
- Sustainable urban extensions - better transport to town centre eg Kingsthorpe, Barack Road, A45, Bedford Road opposite hospital.
- Cycle paths on narrow streets are too narrow.
- Local Plan could propose local corridors
- Broadband – will it have capacity for student demand?

Employment

- Moulton Park – housing adjacent industrial park is not ideal.
- There are small industrial units / clusters across the town which are important. Will they be protected?

A workshop was also held on 04 May 2016 for nominated representatives all Parish Councils and Neighbourhood Forums in Northampton Borough to receive a briefing on the Local Plan preparation process and timetable and to discuss issues identified.

Eleven representatives attended this workshop. A range of issues were discussed including:

Housing:

- Brownfield first, can the Council offer financial incentives?
- Residential over shops
- Will need to use greenfield sites as well as brownfield
- Affordable housing
- Enabling older people and others to move through the housing stock, providing appropriate and smaller housing options to encourage people to move into smaller homes/downsizing.
- Private rented sector – better managed, regulation to avoid overcrowding
- Need to ensure that we do not lose vital community space

Infrastructure

- NW Bypass
- Develop land by old Power Station and river for hospital/fire/ambulance station near to bypass.
- Social infrastructure – GPs, schools
- cemeteries, NW bypass, roads and cyclepaths and strategy, bus routes are all radial not around the town/circular, health centres, school sites, affordable and reliable transport
- Small developments need to contribute to infrastructure due to cumulative impact.
- Review the WN Local Infrastructure Plan and produce a Northampton infrastructure plan.

Town centre

- More homes in town centre to improve vitality, population mix and customer spend. Currently it is just shops. Need café culture, safe open public spaces, plazas and water features, galleries, artisans, boutiques. A destination.
- Redefining the role of the town centre, more social/restaurants, entertainment/cultural role.

- Town centre determines what type of housing is needed in and near to the town centre.
- Use the riverside more.
- Purpose of town centre needs rethinking: Rushton Lakes, Milton Keynes, BHS may go. Need smaller individual shops, more unique, a destination, eg theatres, rather than somewhere to go shopping.
- Students will bring vitality and also demand for cheaper retail market/goods.
- Focus on economy end of retail market and artisan/unique shops, but not the retail inbetween.
- Does CAAP address this for the Town centre? Eg type of retail to attract, type of employment in relation to University.
- Make better use of market as a destination
- Bus station needs to work well, the bus network is important to Northampton - an integrated station, under cover.

APPENDIX 5

Employment Workshop **(25 May 2016)**

Presenters: Cristina Howick (Peter Brett Associates), Stuart Cook (Aspinall Verdi)

Introduction

CH explained that the purpose of the workshop was to gather evidence (in their role as critical friend) to aid the preparation of the Northampton Local Plan. They have done some initial research and they will present their findings. The workshop will be interactive to allow attendees to provide their own opinions and factual information.

They will focus on 4 key market sectors: large industry/ middle sized/ small sized/ offices.

Large warehousing/ industry

- Large sheds have grown in size and demand
- Online retailing – strategic location to service national markets
- Competition from outside Northampton, query on how this affects the Northampton market
- Large warehousing/logistics has not reached saturation point
- Rental growth would not occur if we are at saturation point
- Need large scale logistics sites up to 2029
- Units get taken up during construction or upon completion
- Golden shed triangle: Nottingham to Birmingham to East Northamptonshire
- Northampton is the largest conurbation, but large occupiers get rejected on sites already allocated
- Need to plan effectively for the future
- Not enough land supply, need to find another large employment area the size of Brackmills and a half. Needs to start in 3 years to service demand over the next 10 – 15 years
- Localised market needs supply now
- No spaces within the confines of the Borough boundary
- Northampton absolutely prime for logistics
- Tenants in Brackmills want to grow and do not want to relocate miles away and lose labour supply
- Need to consider the impacts of neighbouring areas and not in isolation
- Ensure that discussion about employment land takes place with other local authorities
- Need to allocate affordable/ smaller units
- Coca cola site is vacant, LPA should CPO and sell to Brackmills occupiers

Medium sized industry

- Strong demand (around 550- 650 sq.ft), availability tend to be second hand/ secondary stock
- 10% - 11% vacancy of stock
- Need to allocate specifically for these sites
- There are some sites in town which has mid-range stock, but these are limited and taken up quickly
- Size isn't the only thing that's important, shape is too
- Construction cost/ viability will be reflected in the land value. Shortage of land also driving up land values
- Land values pushed to levels not seen in the market before. Pricing very sensitive
- £6.50/ £6.75 psf for rent for mid-size but lack of supply
- Rental levels in Northampton marginally lower than Milton Keynes and on par with Coventry
- Freehold market has an appetite to pay higher levels
- Locations can be more flexible
- Need to consider how people get to work/ public transport/ cycleways/ traffic generation

Small industry

- Need land allocated for small businesses like haulage, scrap yards etc
- Existing sites should be safeguarded and improved upon
- Allocate new sites because rents are growing in the secondary stock and there is not enough new stock
- Could achieve £9/ 9.50 psf
- Losing stock to alternative uses such as trampoline centres, gym etc
- Allocation of large scale employment areas should include supporting facilities like catering services/ crèches etc

Offices

- So few Grade A space in the market
- Need to protect out of town offices and bring new sites forward
- Problems with low unemployment and low employability
- Growth might go elsewhere
- Construction cost is a major problem
- £18 – 20 psf for prime is available out of town but difficult for the town centre
- Occupiers want proximity to town centre and labour supply
- Getting into the town centre is not ideal. Congested. Parking is a problem outside the town centre too
- Need to diversify the town centre/ mixed use
- Infrastructure needs to be right
- Consider delivery of existing sites

**ADDENDUM TO THE CONSULTATION STATEMENT:
Summary of Responses to the Scope and Issues Consultation
(November 2016)**

Addendum

Following the completion of the Northampton Local Plan (Part 2) Options consultation in November 2016, one respondent provided responses to both the Options consultation as well as the Issues consultation which completed in June 2016. The response to the Issues consultation was therefore received 5 months after the consultation period closed.

This means that there are changes to the Summary of Responses to the Scope and Issues Consultation paper issued in September 2016. This addendum to the Summary of Responses to the Scope and Issues Consultation paper has therefore been prepared.

The changes (highlighted in bold and underlined in the table below) are as follows:

Para 4.1 (1 st sentence)	A total of <u>51</u> organisations and individuals responded to the Issues consultation
Para 4.1 (bullet point 3)	Post: <u>3</u> responses were received by post
Para 4.2	<u>Two responses were received after the consultation deadline which means they were not duly made. One response have been included in the summary but clearly marked as not duly made. The second response was received in November 2016, after the Summary of Issues Consultation paper was considered at the Council's Cabinet and published on the Council's website. An overview of the additional responses (not duly made) is provided in this addendum.</u>
Appendix 1 (Responses received by Email/ Post)	The following respondent is added under "Not Duly Made Responses (Late)" <u>AD Hiam</u>

Summary of response (not duly made)

The respondent (not duly made) who sent comments on the Issues Consultation paper in November 2016 commented on each of the questions. An overview of the respondent's comments is provided below.

The respondent had the following key points to raise:

- Support for building one and two bedroom flats in the town centre first where demand is considered to be at its highest
- Conversion/ refurbishment of properties supported, including for student accommodation
- Support for environmentally friendly schemes including greywater recycling, prioritising bikes/ buses/ bipedal modes, roof gardens, green routes

- Promote a reduction in business rates (including for empty office units/ entrepreneurial and enterprises in the SMEs sector) by 95%
- Keep the University of Northampton as an active academic centre of excellence for STEM subject degrees and IT apprenticeships
- Concern about flooding in the St James and Far Cotton areas, and the problem associated with surface water retention
- Decrease car use in the town centre/ no additional car parking facilities in the town centre – promote a system similar to the Dutch
- Turn empty offices into SME start-ups for hi tech, entrepreneurial/ enterprise businesses
- Build upwards not outwards
- Concentrate on building on brownfield sites and ignore the designated SUEs

Whilst the responses came in too late to inform the publication of the Options consultation paper, they will be used to shape the contents of the draft Local Plan.

Comments relating to the scope of the Sustainability Appraisal and the draft Statement of Community Involvement have been added to the relevant summary reports accordingly.