

## Northampton Local Plan - Summary of Responses to Sustainability Appraisal Scoping Report

### Q32 DO YOU HAVE ANY COMMENTS ON THE SUSTAINABILITY APPRAISAL SCOPING REPORT?

Growing Together Neighbourhood Forum	No comment
Whitehills and Spring Park Residents Association	<p>SA Objectives:</p> <p>Housing: 1. Help make housing available and affordable          Questions the definition of affordable housing. No affordable housing in Buckton Fields East. Who monitors this provision. Developers can move their allocation to another of their development. Who keeps the register.</p> <p>Use of the Car: 2. Improve public transport services          Questions how the provision of public transport can be improved. Northampton has a reduced bus station. There is no joined up thinking, no bus and rail hub despite changes to both. Rail station not access friendly to the elderly/ disabled/ travellers with luggage/ mums and dads with buggies. A lift was promised, this has not materialised</p> <p>Access to schools: 3. Be within walking distance of schools          Queries how this can be achieved. At least 30% of children are collected by car from the local primary school. Some children from Buckton Fields may go to Boughton, which is not within walking distance</p> <p>Health: 4. Improve access to healthcare          Failing NHS/ longer waiting times for GP appointments/ overstretched hospital - interested in specifics on how this can be achieved with increased population</p> <p>Northampton town: 7. Maintain the character of the Town Centre          Assumes the character relates to the old character not the current character. Questions when the author last visited the Town Centre. Pound shops/ cash converters/ charity shops etc serviced by expensive non pedestrianised area of Abington Street. Northampton well known for drinking culture. Would like to see list</p>

	<p>of priorities to enable this objective to be addressed. Queries – how will Northampton attract retail companies/ clean back streets/ HMO maintenance – need more investment and pride. Cultural area and Guildhall are role models</p> <p>Protect Northampton’s townscape: 10. Conserve the townscape This is based on the assumption that the townscape is in good shape</p> <p>Flooding: 14. Reduce the risk of flooding, avoid development on flood plain. 1998 event is a warning to Northampton</p> <p>Waste: 16. Encourage recycling and avoid locating waste management facilities near sensitive areas. Eg St James – explain how locating waste management facilities here can meet the objective. Areas with rubbish, overgrown shrubs, weeds and generally filthy. No pride. How will this change. WASPRA asked about use of food bins. 84 asked, 19 food bins used. How can this be improved to avoid food going to landfill.</p>
Favell Gospel Hall Trust	<p>Welcomes the recognition of NPPF core planning principles and reference to para 2.21 and 2.22 on health, security, community and cultural infrastructure, and other local facilities alongside the recognition of the voluntary and private sector.</p> <p>Data on social inclusion and deprivation/ population data/ life expectancy noted. The SA and Local Plan should ensure adequate consideration of social and community infrastructure with meaningful engagement with the voluntary and private sector, including local faith communities.</p> <p>Support identification of indirect influences on crime and fear of crime. Urge that the SA ensures adequate weight given to considerations such as economic, social and environmental impacts. Ensure Northampton Borough progresses towards a truly sustainable community.</p> <p>Table 5.1 should be expanded to reflect the sentiments of NPPF paras 70. 162. 171 and references to the range of community facilities. Draw on the findings of the CAG report “Northampton Faith Communities Profile and Places of Worship Audit &amp; Needs Assessment”.</p> <p>Refer to “Faith Groups and the Planning System” (AHRC Faith and Place Network, October 2015)</p>
Environment Agency	<p>SA Objective 13 A section should be included that refers to land contamination and groundwater protection to ensure that potential risk posed to controlled waters is assessed on a site by site basis. Where development is</p>

	<p>proposed on a site which is known or has the potential to be affected by contamination, a preliminary risk assessment should be undertaken by the developer as the first stage in assessing the risk. Developers should follow the risk management framework provided in CLR11 “Model Procedures for the Management of Land Contamination” when dealing with land affected by contamination.</p> <p>GP3 Groundwater Protection: Principles and Practice – useful reference for ensuring groundwater is protected during development. Describes how to manage and protect groundwater in the most sensitive locations.</p> <p>Protect and minimise impact on water quality. Assessment criteria refers to sewerage provision. Some developments can cause physical modification of water bodies (eg affecting flood plain which can lead to deterioration of water quality). Urban run-off has potential to cause poor water quality. These impacts need assessment and mitigation where appropriate. Conserve water resources mainly by adopting water efficiency standards.</p> <p>SA Objectives 14 Updated guidance on how climate change could affect flood risk to new development – see “Flood risk assessments: climate change allowances” (<a href="http://www.gov.uk/">www.gov.uk/</a> 19 February 2016).</p> <p>Flood risk vulnerability classification and lifetime of proposed development should be confirmed in line with the NPPF and the appropriate allowances applied. The Nene river catchment falls within the Anglian River Basin District. If hydraulic modelling is proposed, additional model runs may be required to ensure that all the correct scenarios are considered.</p>
CC Town Planning	No comment
Historic England	<p>Guidance produced entitled “Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment” which HE considers helpful. More information can be found here: <a href="https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/">https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/</a></p> <p>Welcomes reference to cultural infrastructure (para 2.21) and historic environment (para 2.22).</p> <p>Welcomes reference to historic environment (paras 3.43 – 3.44) but greater importance should be shown with dedicated paragraphs at this stage in relation to both designated and non-designated heritage assets, such as (as a summary of para 3.80): Northampton contains a wealth of designated and non-designated assets including 22 Conservation Areas, 1 registered Battlefield, 10 Scheduled Monuments, 43 Grade I</p>

and II\* Listed Buildings and a further 399 Grade II Listed Buildings together with archaeological remains and other non-designated heritage assets.

For clarity, HE's records show the following scheduled ancient monuments:

1003176 Remains of Northampton Castle

1006620 Saxon palace complex and Saxon and medieval urban deposits in the centre of Northampton

1010742 Upton Bowl Barrow

1012150 Multivallate hillfort at Hunsbury Hill

1012328 Clifford Hill motte castle

1015536 Eleanor Cross base in St Michael's churchyard

1006639 Upton medieval village and C17 garden earthworks

Reference to Grand Union Canal as a cultural asset (Para 3.48) welcomed.

Paras 3.78 – 3.81 welcomed. Reference to locally listed buildings supported. Reference to other non-designated assets including archaeological remains is suggested. Reference to baseline data should be included to ensure sound evidence base.

Table 4.1 “Key sustainability issue for Northampton” in relation to “areas and sites of significant historic importance” – inclusion of non-designated heritage assets including archaeological remains would strengthen this sustainability issue.

Table 5.1 – the inclusion of an objective (no 11) in relation to the historic environment is welcomed. The guidance referenced above suggests the following objective: “conserve and enhance the historic environment, heritage assets and their settings” – this would provide a more robust and comprehensive objective in relation to the historic environment.

Page 93, Table A2.1 – an additional question should be included in relation to non-designated heritage assets. Need for individual assessment rather than blanket measurements within the assessment criteria – strongly welcomed. Suggest that the proximity to designated heritage asset bullet point criteria listed below is deleted in order to allow for specific assessment in relation to each site. Acknowledged that the final paragraph goes on to state that assessment scores may need to be adjusted to take into account the relationship of the development site option and the designated site using Historic England's advice is welcomed – but – would be clearer to delete reference to distance to allow for accurate and individual assessment of each site. HE do not support the use of such means to identify impacts as distance is not a

	<p>measure of harm. Whilst it is accepted to use distance as an identifier of assets in the area around a potential site, it should not be extrapolated as an impact assessment – eg there may be sites within a conservation area which could be an enhancement.</p> <p>A number of comments call into question the strategy employed by the Council. There are particular concerns in relation to the Sustainability Appraisal site appraisal methodology. Consider that this would not meet the requirements of the SEA directive, nor would it ensure that site allocations are sound.</p>
Bovis Homes	<p>Table 4.1: Key sustainability issues for Northampton</p> <p>Affordable housing: acknowledge that the delivery of affordable housing is a challenge for the Borough. The site to the west of South Northampton SUE as part of a comprehensive development would provide for a mix of housing in accordance with the Framework.</p> <p>Car dependency: site to the west of South Northampton SUE would form part of a comprehensive development with a local centre and choice of sustainable modes of transport and contribute to a reduction in car dependency.</p>
Conservation Area Advisory Committee	<p>Para 3.64: stated improvements are debateable. Eg new bus station leaves many travellers standing out in the Drapery in all weathers. Spread between shops makes changes between buses difficult for the infirm. Could have discouraged public transport use. Reviews of each “improvements” would be useful.</p> <p>Para 3.80: states there are 7 scheduled ancient monuments (SAMs). Para 3.81 says there are 8 SAMs – which is the extra one?</p> <p>Table 5.1 – Objectives and Questions</p> <p>1 Housing – objectives should include a balance between different types of housing</p> <p>7 Character and vitality of town centre – need to strengthen the 24 hour economy not just the evening economy. Reference should be a range of housing not just “housing”. Objectives should include facilitating travel, and desire to travel, into the town centre</p> <p>9 Biodiversity – include important green sites which support biodiversity but which do not have a designation such as Billing Road cemetery</p> <p>11 Protect and enhance the historic environment – generally good, but should include local list and non-designated heritage assets as required by the NPPF</p> <p>Table A2.1 Effects on objectives</p>

	<p>1 Housing – document states that all housing developments will have a positive effect but whilst they all have a positive effect on the amount of housing, they will not necessarily have an equally positive impact on the range of housing, increased social housing and improved stock of housing. Housing developments should be measured against these wider housing objectives</p> <p>10 – Townscape and landscape and 11 – Heritage. Contrary to assessment’s statement, we cannot assume that redeveloping a brownfield site will always be positive. Existing buildings or site may make a positive contribution to the character of the area, and redevelopment may be inappropriate in character. Cannot assume that it will always be beneficial to redevelop a brownfield site in a built up area (11) – the existing site may make a positive contribution, or may provide much needed open space.</p>
Natural England	<p>NE broadly satisfied with the proposed scope. Generally welcome SA objective “Protect and enhance Northampton’s biodiversity and geodiversity”. Concerned by presence of “?” in the assessment criteria. Where elements of uncertainty exist, NE would expect to see evidence that negative effects on important environmental assets can be avoided before sites and policies are committed to in local plans. All relevant constraints should be clearly identified prior to assessment to allow informed decisions to be made.</p> <p>Disagree with distance criteria used to determine negative effects on Nene Valley Gravel Pits SPA. Current evidence suggests that recreational disturbance can have a significant effect where developments are located up to 3km from the site. Distance criteria used to determine significant effects needs to reflect this.</p> <p>Habitats Regulation Assessment – Note HRA will be undertaken for the local plan part 2 in due course and reported on separately to the SA. NE agrees with this – given the level of detail required to assess potential impacts to Upper Nene Valley Gravel Pits SPA</p>
Northamptonshire County Council Public Health	<p>Welcome strong references to health and wellbeing. Should be included in local plan part 2 consultation.</p>
Anglian Water	<p>Reference is made to building on policies in the adopted JCS and phasing of development in relation to waste water treatment capacity. Helpful if this could be considered further in local plan part 2.</p>
West Hunsbury Parish Council	<p>No comments</p>
Northamptonshire Police	<p>Pg 36: reference to “it is possible through good design to reduce opportunities for crime” and SA Objective 5 is referenced. When looking at SA5, this sentiment appears to have been lost. SA Objective 5 does not seek to address the sustainability issue for Northampton of high levels of crime. How these 2 things which are crossed referenced could be explained.</p>

	<p>SA Objective 5. Reduce crime and fear of crime in Northampton  Take issue with the rather simplistic assessment of the factors on which levels of crime will depend. Levels of crime will increase on any development site which has previously been a greenfield regardless of where that greenfield is located. The use of measures line CPTED and SBD which are proven to reduce opportunities for crime by up to 50% will reduce the effect of new development on crime levels – but cannot understand how the effects of potential sites on this objective can be deemed to be “negligible”. Any building where there has not been a building is bound to generate crime and opportunities for anti-social behaviour unless detailed design work is carried out to design out opportunities for such behaviour.</p>
Hardingstone Parish Council	<p>2.13: Supplementary Planning Documents – the Affordable Housing Interim Statement SPD will need updating following proposed changes from the Government on affordable housing. The SA should also consider the Parks and Open Space Strategy for Northampton, and the conservation area management plans.</p> <p>3.6 (geography): include strong links (commuter and entertainment) to London</p> <p>3.61 &amp; 2: patterns of travel/ commuting need to be broken down into different areas of the borough, to understand the different needs of the different areas.</p> <p>3.64: stated improvements debateable. Bus station leaves many travellers standing out on the Drapery in all weathers waiting for their bus, could well discourage public transport use. Review of each of these improvements would be useful, to determine what new requirements they have brought and what old requirements remain to be fulfilled.</p> <p>3.71 – 76: Biodiversity section should take note of the green networks identified in the Northamptonshire Landscape Sensitivity and Green Infrastructure Study (eg green/ woodland network from NE to SW leading to Salcey Forest)</p> <p>3.80: says there are 7 schedule ancient monuments, 3.81 says there are 8</p> <p>Table 5.1 – Objectives and Questions</p> <p>1 Housing – needs a question about balance between different types of housing  2 Reduce the need to travel in Northampton by providing easy access to jobs, services and facilities without the need to travel by car – sounds like it is aimed to dissuade people from travelling into Northampton for services, which won't help economic vibrancy. Better phrase would be “reduce the need</p>

to travel by car within, to and from Northampton, by providing easy access to sustainable travel alternatives”

3 Siting residential developments and school to reduce travel is really part of 2. Should also refer to access to schools with sufficient places to absorb the children living in the new development

4 Improve health – should explicitly include physical and mental health and wellbeing, and access to the countryside should be given more priority. Links to Northamptonshire Health and Wellbeing Strategy 2013-16

6 Employment and economy – tying a 13 year plan to broadband is short sighted. 4G already taking over. Better to say “communication technology eg broadband”

7 Character and vitality of town centre – strengthen 24 hour economy not just evening economy. Refer to range of housing, not just housing. Add something about facilitating travel and desire to travel into the town centre

9 Biodiversity – included important green sites which support diversity but have not been designated (eg Hardingstone’s Cherry Orchard)

10 Protect and enhance the historic environment – generally good. No mention of local list of non-designated assets, which require protection in NPPF

12 Air pollution – not ambitious enough to limit an increase in air pollution. Aim for reduction. DEFRA 2007 paper on air quality stresses improvement (p71/100 of committee paper)

#### Appendix 1

NPPF – paper doesn’t pull out the objective of maintaining assets which the community holds as important. Mentions green belt but nothing more. Don’t mention social sustainability or building sustainable communities.

White Paper on natural environment – paper mentions aim of reconnecting people and nature but not translated into an objective. Objective is about enhancing natural environment (9 and 10) not enhancing access to it. Needs to be included in the objective.

#### Appendix 2

Assumptions regarding walking distances – no justification for taking the straight line distance from edge to edge. Distances are used to judge likely human behaviour and so should reflect human experience. More likely to be centre to centre, and which follow paths and roads. Why assume people would be willing to walk further to school, work or a railway station than to town? “It is considered that this is a reasonable

	<p>approach” is not good enough justification for a methodology. Looks more like “this will make it easier”.</p> <p>Table A2.1 Effects on objectives</p> <p>1 Housing – document states that all housing developments will have a positive effect. Whilst it will have a positive impact on the amount of housing, this is not necessarily the case of “range” of housing, increased social housing or improved housing stock</p> <p>1 and 3 Reducing travel – problems with distance assumptions (see above). Otherwise ok. Needs to take into account whether the site would give easy access to longer distance services and employment 9 (eg development near M1 may encourage commuting to London, MK, Birmingham by car)</p> <p>4 Health – consider open space separately from sport. Open space can contribute to wellbeing, reconnecting people with nature. Employment sites are measured only by proximity to residential developments – should be considered for proximity to health facilities. If employment sites are close to open space or sports facilities, workers can make the most of these for healthy lifestyles</p> <p>5 Crime - states that location is not important for crime. Links to surrounding areas can increase fear of crime. Eg Hardingstone’s pedestrian links to town are through underpasses only which many fear to use after dark</p> <p>7 Vitality of Northampton town centre – claims that residential development won’t have any impact on town centre’s vitality. It could do if sites for easy access to other commercial sites. Eg residential developments to the south may encourage residents to use London and MK, to the east may use Raunds, to the north may prefer Market Harborough and Leicester</p> <p>10 Townscape and landscape and 11 Heritage – can’t assume that redeveloping brownfield site will always be positive. It may have been a positive contribution to the character of the area, and be replaced by a completely inappropriate development. Can’t assume it will always be beneficial to redevelop a brownfield site in a built up area (11). The site may make a positive contribution or may be a much needed open space</p>
Dr R Alexander	None