



CABINET REPORT

Report Title	NORTHAMPTON LOCAL PLAN PART 2 – SUBMISSION DRAFT CONSULTATION (ROUND 2)
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AGENDA STATUS: PUBLIC

Cabinet Meeting Date:	10 th June 2020
Key Decision:	YES
Within Policy:	YES
Policy Document:	YES
Service Area:	Planning
Accountable Cabinet Member:	Councillor James Hill
Ward(s)	All

1. Purpose

- 1.1 The purpose of the report is to present the revised submission draft of the Northampton Local Plan Part 2 for consideration and to seek approval for a second round of public consultation and the Consultation and Engagement Strategy for this consultation.

2. Recommendations

2.1 It is recommended that:

- (i) Cabinet approves the revised Submission Draft of the Local Plan Part 2, Policies Map and Sustainability Appraisal for publication under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended.
- (ii) Cabinet approves the Consultation and Engagement Strategy for this consultation

- (iii) The Director of Planning and Sustainability be given delegated authority in consultation with the Deputy Cabinet Member for Planning to make minor spelling, formatting, mapping and other amendments to the consultation documents and the Consultation and Engagement Strategy where they do not alter the intent of those documents.

3. Issues and Choices

3.1 Report Background

- 3.1.1 In May 2019, the Council consulted on the Submission Draft Northampton Local Plan Part 2, which set out the planning framework for the borough to 2029. The plan was prepared in a manner that conformed with the policies set out in the West Northamptonshire Joint Core Strategy (Local Plan Part 1). Since the Joint Core Strategy is strategic in nature, it is the role of the Northampton Local Plan Part 2 to set out detailed policies and site allocations specifically for Northampton.
- 3.1.2 When adopted, the Local Plan Part 2 will replace all of the saved policies contained in the Northampton Local Plan (June 1997) and replace the Central Area Action Plan (January 2013). The adopted Local Plan Part 2 will form part of the development plan for Northampton. Planning applications have to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 3.1.3 The Northampton Local Plan Part 2 seeks to deliver the requirements of the West Northamptonshire Joint Core Strategy including the delivery of 18,870 houses and a significant contribution to 28,500 new jobs.
- 3.1.4 Prior to submitting the Local Plan for independent examination by the Planning Inspectorate, the Council is required to release a submission draft for consultation. Public consultation on the Submission Draft of the Local Plan Part 2 took place from 1st May to 14th June 2019. Representations were sought on the grounds of legal compliance and soundness, in accordance with the requirements set out in the National Planning Policy Framework. If, as a result of responses received to that consultation, only minor modifications had been required to the Plan, the Council would have updated the Plan and submitted it to the Secretary of State for Housing, Communities and Local Government.
- 3.1.5 Members will note from the Cabinet report in April 2019 that in addition to the Submission Draft Consultation in May 2019, the Council has previously undertaken three other stages of consultation, namely the Issues Consultation (April 2016), Options Consultation (October 2016) and Sites Consultation (October 2017).
- 3.1.6 The content of the Local Plan has been informed by an extensive evidence base which has been kept up to date and reviewed in the light of representations to previous consultations. The evidence base can be viewed at https://www.northampton.gov.uk/info/200205/planning_for_the_future/1739/

- 3.1.7 The plan must also be subject to Sustainability Appraisal. The purpose of this is to appraise the social, economic and environmental effects of the plan and to consider choices made in comparison to reasonable alternatives. This does not mean that the most sustainable option has to be selected as long as there are valid planning reasons to select an alternative option. The Sustainability Appraisal and Habitats Regulations Assessment have both been carried out for the Council by independent consultants to ensure impartiality.
- 3.1.8 The Council has worked with neighbouring councils and the County Council during the preparation of this plan in accordance with the duty to co-operate.

3.2 Issues

- 3.2.1 The Submission Draft Local Plan Part 2 published in April 2019 contained 38 policies, five of which were site specific related. The Council received consultation responses from 93 respondents to the Northampton Local Plan Part 2, generating over 900 separate comments. 55 respondents stated that the Plan was legally compliant whilst 21 said it was not. It should be noted that some respondents were supportive of the Plan, but where changes are recommended, even minor changes, they had to state that the Plan was not sound.
- 3.2.2 19 respondents said the Plan was sound and 63 said it was not. Comments were received from statutory consultees including objections from Historic England on the basis that Heritage Impact Assessments needed to be undertaken for some of the site allocations prior to confirming their allocation. Natural England considered that more details were required in some of the policies to strengthen their direction and requirements. Public Health England (Northamptonshire) also wanted to see additional policies associated with health included in the Local Plan. Objections were also received from members of the public on some of the proposed allocations, particularly those with larger capacities. Developers and housebuilders had concerns about the details of the housing policies. The highest number of objections came from Great Houghton residents who opposed the allocation of a site at The Green for housing.
- 3.2.3 Extensive consideration was given as how to the Plan should be changed to deal with these objections. Further work has been progressed to take on board the comments received, including the commissioning of a Heritage Impact Assessment and ongoing dialogue with key stakeholders including Historic England, Natural England and Homes England. The nature of the changes required to be made to the Northampton Local Plan Part 2 Submission Draft was such that major changes needed to be made to the Plan, necessitating a second round of consultation on the Submission Draft.
- 3.2.4 This revised Submission Draft now contains 44 policies, of which six are for site specific allocations. The new and strengthened policies cover topics such as health and wellbeing, climate change and sustainable construction and hot

food takeaways. The revised submission draft is attached at Appendix A to this report.

- 3.2.5 Sufficient capacity has been identified to meet the WNJCS requirement for the provision of 18,870 dwellings in Northampton from 2011 to 2029. However, it should be noted that the housing trajectory set out in the Local Plan is different from the proposed housing delivery trajectory set out in Appendix 3 of the WNJCS. The delivery rates envisaged in the Core Strategy for Northampton in this period are very high – for example 1,588 dwellings in 2019/20 and 1,278 dwellings in 2022/23. In practice, housing completion rates in Northampton have been slower than the rates set out in the Core Strategy and are predicted to continue in the same way for the first few years of the Plan period. Completions in sustainable urban extensions, in particular, are running at lower rates than were expected. Members will recall that the previous Submission Draft Local Plan, contained a housing delivery trajectory that differed from the proposed housing delivery trajectory set out in the WNJCS by setting lower figures for the first five years, with higher rates of delivery in later years of the plan period. The revised Submission Draft takes the same approach, but the annual delivery figures have been updated to take into account the most up-to-date evidence on the availability of housing sites and the numbers of dwellings likely to be delivered.
- 3.2.6 A Sustainability Appraisal (attached at Appendix B) has informed the preparation of the revised Submission Draft. Reasonable alternatives to the policies and sites have been assessed during the preparation of the plan and these have informed its formulation.
- 3.2.7 Subject to the approval of the revised Submission Draft of the Local Plan Part 2 for public consultation, it is proposed that consultation commences on 13th July 2020 for a six week period closing on 24th August 2020.
- 3.2.8 The Council's Statement of Community Involvement states that there should be a Consultation and Engagement Strategy for plan-making setting out who, when and why we consult. A special version of the Consultation and Engagement Strategy has been produced (attached at Appendix C) in order that consultation can be effective without breaching guidelines relating to the Covid-19 outbreak. Government regulations require that copies of local plan consultation documents should be made available at the local planning authority's principal office and posted online. In previous consultations, the Council has also made paper copies of documents available at public libraries and parish council offices. The Consultation and Engagement Strategy still allows this to happen, but only if and when Government guidelines relating to the Covid-19 outbreak allow this.

3.3 Choices (Options)

Option 1: agree the recommendation

- 3.3.1 If Cabinet approves the revised and updated Submission Draft version of the Local Plan Part 2, Policies Map and Sustainability Appraisal for another round of consultation, and the associated Consultation and Engagement Strategy,

the Council will be able to go out to public consultation for six weeks from 13th July 2020. This should then make it possible to achieve other milestones in the preparation of the Plan with a view to adopting it by September 2021. Although by then West Northamptonshire Council will have replaced Northampton Borough Council as local planning authority, this will ensure that there is an up-to-date set of local plan policies against which to consider planning applications in Northampton and to replace the saved policies of the Northampton Local Plan from 1997 and the Central Area Action Plan, 2013. This will complement the Local Plan Part 2s that have recently been adopted by Daventry District Council and South Northamptonshire Council.

Option 2: do not agree with the recommendation

- 3.3.2 Cabinet could defer or decide not to approve the revised Submission Draft of the Local Plan Part 2, Policies Map and Sustainability Appraisal for consultation. This would mean that the Council would continue to have planning policies that are becoming increasingly outdated, making it increasingly difficult to manage development effectively.

4. Implications (including financial implications)

4.1 Policy

- 4.1.1 The Local Plan Part 2 will replace the 1997 Local Plan Saved Policies and the Central Area Action Plan. An up-to-date plan will provide greater certainty and allow policies at the local level to address local issues and be fully compliant with up-to-date requirements and the requirements of the adopted Joint Core Strategy. Planning applications will be determined in accordance with the development plan, including the Local Plan Part 2, unless material considerations indicate otherwise. Policies in an emerging plan have increasing weight the further they progress through the process.

4.2 Resources and Risk

- 4.2.1 Sufficient financial resources are available for the consultation to take place as scheduled in the budget for 2020/21. Every effort will be made to ensure that consultation on the Local Plan Part 2 and its submission to the Secretary of State are not adversely affected by any redeployment of Planning Policy staff as a result of efforts to tackle the Covid-19 outbreak.

4.3 Legal

- 4.3.1 The Local Plan is a statutory document and has to be prepared in accordance with the Planning and Compulsory Purchase Act 2004, as amended; the Town and Country Planning Act (Local Planning) (England) Regulations 2012, as amended, The Environmental Assessment of Plans and Programmes Regulations 2004; and the Conservation of Habitats and Species Regulations 2010.

4.4 Equality and Health

4.4.1 An equalities impact assessment has been carried out. None of the policies in the document went beyond the screening stage as no unjustified negative impacts were identified.

4.5 Consultees (Internal and External)

4.5.1 Cabinet Advisory Group have been regularly briefed and had the opportunity to comment throughout the plan preparation process. Feedback from members of the public, businesses, agents, developers, other local authorities and community groups during previous public consultation, and since, has been taken into account in the preparation of the revised Submission Draft Local Plan Part 2.

4.6 How the Proposals deliver Priority Outcomes

4.6.1 The Local Plan Part 2 will help to guide all development across Northampton, achieving economic, environmental and social benefits. In terms of the strategic priorities set out in the Council's Corporate Plan, the Local Plan Part 2 will help to deliver a stronger economy by having a local plan that helps Northampton grow and prosper, whilst preserving the town's heritage. It will help create resilient communities by encouraging and supporting housing delivery whilst protecting the health and wellbeing of the people of Northampton and its environment.

4.7 Environmental Implications (including climate change issues)

4.7.1 On 3rd June 2019, the Council declared a climate change emergency, and the objective to make Northampton carbon neutral by 2030. The local plan contains policies that help to address climate change and will help to improve the sustainability of new development.

4.8 Other Implications

4.7.1 There are no other implications arising directly from the proposals in this report.

5. Background Papers

5.1 National Planning Policy Framework, 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

5.2 West Northamptonshire Joint Core Strategy, 2014

<https://westnorthantsjpu.inconsult.uk/connect.ti/website/view?objectId=2737424>

5.3 Central Area Action Plan, 2013

https://www.northampton.gov.uk/info/200205/planning_for_the_future/1748/central_area_action_plan_caap

5.4 Northampton Local Plan, 1997

https://www.northampton.gov.uk/info/200205/planning_for_the_future/1746/

5.5 Northampton Statement of Community Involvement, 2018

https://www.northampton.gov.uk/info/200205/planning_for_the_future/1746/

Appendix A - Northampton Local Plan Part 2 Submission Draft (Round 2), June 2020

Appendix B - Sustainability Appraisal and Habitats Regulations Assessment of the Northampton Local Plan Part 2 (Round 2), June 2020, Land Use Consultants

Appendix C – Consultation and Engagement Strategy – Northampton Local Plan Part 2

6. Next Steps

- 6.1 The results of this second round of consultation will be fed into the Submission version of the Northampton Local Plan Part 2. The Submission version will be considered at Cabinet for approval for submission to the Secretary of State for independent examination.

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