

Item No: 6

Date: 16 December 2013

**WEST NORTHAMPTONSHIRE  
JOINT STRATEGIC PLANNING COMMITTEE**

**Proposed Main Modifications to the  
West Northamptonshire Joint Core  
Strategy as submitted**

**REPORT OF THE HEAD OF THE JOINT PLANNING UNIT**

**1. Purpose**

1.1 The purpose of this report is:

- a) To seek approval for the publication of Proposed Main Modifications (attached as Appendix 1) to the Pre-Submission version of the West Northamptonshire Joint Core Strategy, as amended by the Proposed Changes, for a six week consultation period , to run from 14 January to 25 February 2014; and
- b) To seek approval for the Communication and Consultation Strategy at Appendix 2 to support the Proposed Main Modifications to the Pre-Submission version of the West Northamptonshire Joint Core Strategy as amended by the Proposed Changes.

**2. Recommendations**

2.1 That the Joint Strategic Planning Committee:

- 1) Approves the Proposed Main Modifications (attached as Appendix 1) to the Pre-Submission version of the West Northamptonshire Joint Core Strategy, as amended by the Proposed Changes, for a six week consultation period to run from 14 January to 25 February 2014;
- 2) Authorises the Chair of the Joint Strategic Planning Committee to agree any editorial changes required to the Proposed Main Modifications; and
- 3) Approves the Communication and Consultation Strategy, as attached at Appendix 2, to support the Proposed Main Modifications to the Pre-Submission version of the West Northamptonshire Joint Core Strategy, as amended by the Proposed Changes.

**3. Overview of the Joint Core Strategy Process to Date**

3.1 The main body of this report is structured into seven sections. Starting with this section: the report provides a brief overview of the Joint Core Strategy Process to Date. The following section, Section 4, summarises the background relating to producing the Objectively Assessed Housing Need for the West Northamptonshire Area. Section 5, provides an introduction to the proposed Main Modifications to Joint Core Strategy by section of the Strategy. The full list of Proposed Modifications is included in Appendix 1 to this report. This section also covers some other matters such as the Equalities Impact

Assessment of the Strategy and the format in which the Proposed Main Modifications are to be published. Section 6 provides a summary of the SA Addendum report findings with Section 7 covering the Habitat Regulations Assessment (HRA) Addendum report findings. Section 8 touches on the Communication and Consultation Strategy. Finally, Section 9 covers the next steps in the preparation of the Joint Core Strategy. At the end of the report is a list of Background Documents relating to the Proposed Modifications. These are available to read and download from the West Northamptonshire Joint Planning Unit website. The report has two appendices to it: Appendix 1 is made up of the Schedules of the Main Modifications to the Joint Core Strategy, as submitted. This Appendix also includes maps relating to key spatially related modifications such as relating to the SUEs. Appendix 2 contains a Communication and Consultation Strategy for the Proposed Main Modifications.

- 3.2 The Joint Core Strategy will be the long term strategic plan for the development of Daventry District, Northampton Borough and South Northamptonshire administrative areas it deals with the big picture of what will happen in the future. It is a spatial policy document, which means it deals with places and the activities that happen within and between them. The Joint Core Strategy is the priority planning document and all subsequent documents must reflect what it says.
- 3.3 At its meeting on 31 January 2011 the West Northamptonshire Joint Strategic Planning Committee approved the publication of the Pre-Submission version of the West Northamptonshire Joint Core Strategy for the statutory six weeks representations period in accordance with the then Regulations 27 and 28. The content of the Pre-Submission Joint Core Strategy was informed by the Joint Core Strategy Issues and Options (2007), the Regulation 25 consultation (2009) and the Emergent Joint Core Strategy consultation in 2009, as well as the collection of a wide ranging evidence base and on-going work with technical bodies.
- 3.4 At its meeting on 25 July 2011, the West Northamptonshire Joint Strategic Planning Committee formally received the quantitative analysis of and the summary of the main issues raised by the representations received to the Pre-Submission Joint Core Strategy.
- 3.5 At its meeting on 16 July 2012, the West Northamptonshire Joint Strategic Planning Committee approved the Proposed Changes to the Pre-Submission version of the West Northamptonshire Joint Core Strategy for the statutory six week representations period together with an additional two week advance publicity period to take account of the fact that the representations period coincided with the summer holiday period. The Proposed Changes to the Pre-Submission Joint Core Strategy were prepared in the light of the representations to the Pre-Submission Joint Core Strategy; changes to national planning policy, particularly in terms of the National Planning Policy Framework (NPPF); and the evidence base.
- 3.6 The West Northamptonshire Joint Core Strategy and its supporting documents were approved for submission to the Secretary of State for Examination by the West Northamptonshire Joint Strategic Planning Committee at its meeting on 20 December 2012. The supporting documents included all the representations received to the Joint Core Strategy and these representations still remain with the Inspector for this consideration.
- 3.7 The Examination Hearings sessions programmed between Tuesday 16 April and Wednesday 1 May 2013 have all been completed. Those sessions covered the following issues:
  - Issue 1 – Strategy/ Vision/ Objectives
  - Issue 2 – Retail and Distribution
  - Issue 3 – Housing Scale and Distribution
  - Issue 4 – Housing Policies

- Issue 5 – Economy/ Employment
- Issue 6 – Built and Natural Environment
- Issue 7 – Infrastructure and Delivery
- Issue 8 – Transport
- Issue 9 – Northampton North SUE
- Issue 10 – Northampton West SUE
- Issue 11 – Northampton Kings Heath SUE
- Issue 12 – Northampton South SUE
- Issue 13 – Northampton South of Brackmills SUE
- Northampton Upton Park SUE
- Issue 14 – Northampton North of Whitehills SUE
- Issue 15 – Northampton Omission Sites
- Issue 16 – Rural Areas
- Issue 17 – Brackley
- Issue 18 – Towcester
- Issue 19 – Daventry
- Issue 20 – Monitoring and Implementation

- 3.8 As a result of the final revocation of the East Midlands Regional Spatial Strategy and in the light of the evidence considered and discussed at the Hearings the Inspector requested that the Joint Planning Unit (JPU), representing the Partner Councils, undertake a fresh assessment of the objectively assessed needs for new housing in the area over the plan period and beyond. The Inspector also asked the JPU to prepare a Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) Addendum Report to address acknowledged shortcomings in the work to date, (particularly relating to the selection of the Sustainable Urban Extension (SUE) sites around Northampton and the other towns) on a comparative basis and related to the reassessed housing needs of the area.
- 3.9 The JPU agreed with the Inspector that both the objectively assessed housing need and the SA/ SEA Addendum Report would be completed as soon as possible and that the JPU would assess the outcomes “with an open mind”, before deciding whether to put forward any further modifications for the Inspector to consider.

#### **4. Objectively Assessed Needs – Housing and Jobs**

##### Overview

- 4.1 The housing numbers in the Joint Core Strategy were prepared on the basis of the East Midlands Regional Spatial Strategy (RSS), and then reduced on the basis of delivery and infrastructure considerations. The revocation of the RSS on the Friday before the Joint Core Strategy (JCS) Examination Hearings started removed the general conformity requirement. However, this was effectively replaced by the National Planning Policy Framework (NPPF) requirement to meet the “objectively assessed needs” of the area.
- 4.2 The Inspector considered that the work supporting the housing numbers did not meet the requirements of the NPPF, and specifically did not refer to the government supported What Homes Where Toolkit, published on 11 March 2013, 5 weeks before the start of the hearings. He therefore requested that further work be undertaken which would satisfy the requirements of the NPPF, and set as parameters, a minimum annualised delivery rate based on the 2011 Census based projections, and a maximum based on the What Homes Where Toolkit. He did further comment that this was no reflection on the quality of the work already undertaken, or on the numbers which resulted from that work, but simply based on a need to comply with the latest government advice following the revocation of the RSS. The housing numbers in the Joint Core Strategy as submitted fitted within the range suggested by the Inspector as likely to be acceptable.

- 4.3 In addition, the Inspector expressed his concern about the length of time remaining for the plan period given a potential adoption date of 2014. He therefore asked the Joint Planning Unit to consider the consequences of extending the plan period to 2029 and to 2031.

#### JPU Commissioned Work

- 4.4 The JPU has commissioned two separate pieces of work to independently help identify the “Objectively Assessed Needs” for the area, which is what is required by the NPPF. One was commissioned from Peter Brett Associates (PBA), and provided an assessment of both housing and job needs for the area. The second is from the Cambridge Centre for Housing and Planning Research (CCHPR), who also produced the companion guide to the Toolkit. Both reports and the JPU assessment have been published on the JPU website. These can be found at:

<http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=3869072>

- 4.5 In summary, the Peter Brett Associates (PBA) report suggests an absolute minimum housing need of 1,586 per annum for the Plan period 2011-2031 (which they acknowledged should be increased, perhaps substantially, based on local knowledge and information). The figures suggested lie outside the parameters indicated by the Inspector as likely to be acceptable, and it is considered they do not appear to comply with the National Planning Policy Framework (NPPF). This is supported by legal advice from Counsel, who has advised that these figures are not an appropriate basis upon which to develop modifications to the Joint Core Strategy for the following reasons:-
- PBA departs from the official government projections without adequate justification; and
  - It does not take into account all the considerations advised in the NPPF
- 4.6 By contrast, the CCHPR report suggests an annual rate of housing which varies according to the end date, with the annual rate falling slightly over time. The rate for 2011-2026 is suggested as 2,359 per annum; for 2011-2029 it falls to 2,320 per annum, and for 2011-2031 it reduces further to 2,287 per annum. The resulting figures for each area are:
- 1,581 per annum (2011-2029) and 1,558 per annum (2011-2031) in the Northampton Related Development Area;
  - 388 per annum (2011-2029) and 385 per annum (2011-2031) in the remainder of Daventry district; and
  - 350 per annum (2011-2029) and 344 per annum (2011-2031) in the remainder of South Northamptonshire.
- 4.7 An adjustment for South Northamptonshire and Northampton relating to Grange Park (moving a need of 150 dwellings per annum from South Northamptonshire to Northampton) has been made to the CCHPR figures shown in this section.
- 4.8 The comparison figures from the Proposed Changes to the Pre-Submission Joint Core Strategy are:
- 2,252 dwellings per annum for the West Northamptonshire area as a whole;
  - 1,526 per annum for the Northampton Related Development Area;
  - \* 352 per annum for the remainder of Daventry district; and
  - 374 per annum for the remainder of South Northamptonshire.

## West Northamptonshire Objectively Assessed Need - Conclusions

- 4.9 The development of an Objectively Assessed Housing Need figure for West Northamptonshire is particularly difficult at the present time. There are technical issues with the ONS/ DCLG based population and household projections which should be the starting point of the Assessment of Objectively Assessed Housing Need. These technical issues have been referred to in Sections 4, 5 and 6 of the JPU's Objectively Assessed Housing Needs report.
- 4.10 In summary, the JPU's Objectively Assessed Housing Needs report has considered the projections listed below:
- The 2008 DCLG Household Projections;
  - The 2011 DCLG Interim Household Projections;
  - The Joint Core Strategy as submitted (the Pre-Submission Joint Core Strategy as amended by the Proposed Changes);
  - Peter Brett Associates 2001-2011 Trend Projections;
  - Peter Brett Associates 2006-2011 Trend Projections;
  - CCHPR return to Trend Projections; and
  - CCHPR Tracking Projections.
- 4.11 The JPU's conclusions are set out in full in the Objectively Assessed Needs Report, but in summary they consider that the CCHPR Tracking Projection best reflects the Objectively Assessed Needs for West Northamptonshire and these are set out in Tables 7 and 8 below. It is important and useful to note that the CCHPR methodology has been found 'sound' at other recent local plan inquiries. Please note that these tables, and Tables 9 and 10 that follow, are taken directly from the JPU's Objectively Assessed Housing Needs Report (July 2013), hence the table numbers match those in that report.

### **Table 7: Objectively Assessed Housing and Jobs Need**

[Note – This table is taken from the JPU's Objectively Assessed Housing Needs Report, July 2013]

	<b>Total Dwellings Required from 2011 (Net)</b>		
	<b>2011-2026</b>	<b>2011-2029</b>	<b>2011-2031</b>
Cambridge Tracking	35,385	41,760	45,740
	<b>Total Jobs Required from 2011</b>		
	<b>2011-2026</b>	<b>2011-2029</b>	<b>2011-2031</b>
Cambridge Tracking	23,963	28,520	31,179

**Table 8: Objectively Assessed Housing and Jobs Need (Annualised Rates)**

[Note – This table is taken from the JPU’s Objectively Assessed Housing Needs Report, July 2013]

	<b>Dwellings Required from 2011 Annualised</b>		
	<b>2011-2026</b>	<b>2011-2029</b>	<b>2011-2031</b>
Cambridge Tracking	2,359	2,320	2,287
	<b>Jobs Required from 2011 Annualised</b>		
	<b>2011-2026</b>	<b>2011-2029</b>	<b>2011-2031</b>
Cambridge Tracking*	1,598	1,584	1,559

\* Figures do not fully reflect Table 7 due to rounding

- 4.12 The alternative projections are set out in paragraph 4.10 above. In reaching this conclusion the JPU has considered all the alternative projections set out in paragraph 4.10 above. This analysis indicates that the only reasonable alternative to the CCHPR projections is the 2011 Census-based projections extended to 2029 and 2031 to match the periods being tested. These figures are lower than the CCHPR totals set out in Tables 7 and 8 above, but are based on the latest official Government projections. The JPU is of the opinion that, although these figures are extrapolated from the latest Government projections, they represent a largely recessionary period. Given the economic situation between 2008 and 2011, an objectively assessed housing need based on those figures would not achieve the objectives of paragraphs 14, 16 and 157 of the NPPF requiring local planning authorities to positively seek and plan opportunities to meet the development needs of their area. The JPU has also considered that whilst there is a possibility that the 2011 projections, as extended, may be an over-provision against the next official projections due in 2014, there is little evidence for this and using this hypothesis would be unsound. The projections based on the extended 2011 projections as the only reasonable alternative are set out in Tables 9 and 10 below.

**Table 9: Reasonable Alternative Objectively Assessed Housing and Jobs Need**

[Note – This table is taken from the JPU’s Objectively Assessed Housing Needs Report, July 2013]

	<b>Total Dwellings Required from 2011 (Net)</b>		
	<b>2011-2026</b>	<b>2011-2029</b>	<b>2011-2031</b>
2011 Census-based Projection (Extended)	31,815	36,972	40,260
	<b>Total Jobs Required from 2011</b>		
	<b>2011-2026</b>	<b>2011-2029</b>	<b>2011-2031</b>
2011 Census-based Projection (Extended)	21,836	26,849	30,192

**Table 10: Reasonable Alternative Objectively Assessed Housing and Jobs Need (Annualised Rates)**

[Note – This table is taken from the JPU’s Objectively Assessed Housing Needs Report, July 2013]

	Dwellings Required from 2011 Annualised		
	2011-2026	2011-2029	2011-2031
2011 Census-based Projection (Extended)	2,121	2,054	2,013
	Jobs Required from 2011 Annualised		
	2011-2026	2011-2029	2011-2031
2011 Census-based Projection (Extended)*	1,456	1,492	1,510

\* Figures do not fully reflect Table 9 due to rounding

- 4.13 The JPU does not consider there are any other reasonable alternatives to assess and the reasons for this are given in the JPU’s Objectively Assessed Housing Needs report and set out above. The PBA recommendation is considered to be too low, does not represent positive planning for the area<sup>1</sup> and legal advice is that these should not be used as the basis for objectively assessed need. The 2008-based Sub-National Population Projections are considered to be too high, as evidenced by the results of the 2011 Census. The alternative CCHPR totals and the extended JCS totals are so close to the recommended Objectively Assessed Housing Needs totals that it is not necessary or appropriate to regard them as reasonable alternatives for this purpose.
- 4.14 ***Consequently, for the reasons set out in the JPU’s Objectively Assessed Housing Need Report (July 2013), together with the legal advice received, the JPU are recommending the CCHPR “tracking” projections should be used as the basis for West Northamptonshire’s dwelling calculations.***

Jobs and Employment Considerations

- 4.15 Revised job assumptions have been calculated on the basis of the Objectively Assessed Housing Need figures rather than from a full re-calculation of the Labour Force projections. The revised job assumptions have also been rebased to 2011, from the 2008 base used for the Submission Joint Core Strategy. These included a minimum of 19,000 jobs to be provided within West Northamptonshire after the job losses between 2008 and 2011 which had been recovered. The new, revised, minimum job figures for West Northamptonshire as a whole are:
- 23,673 net jobs by 2026;
  - 28,520 net jobs by 2029; and
  - 31,576 net jobs by 2031.

Housing Requirements by District and Northampton Related Development Area

- 4.16 The breakdown of the housing requirement totals set out in Tables 7 and 8 in Paragraph 4.13 of this report, by district and the Northampton Related Development Area at 2029 and 2031, are set out below in Table A.

<sup>1</sup> In a response to a question from the JPU about their figures PBA state that their figures are the absolute lowest figure below which the OAHN should not fall. They further state that local information and knowledge should be applied which could result in a very significantly higher OAHN for West Northamptonshire.

**Table A – Housing Requirement by District and Northampton Related Development Area**

<b>Housing Requirement (Preferred Cambridge Scenario)</b>	<b>2011-2026</b>	<b>2011-2029</b>	<b>2011-2031</b>
Daventry District (Excluding the NRDA)	5,917	6,984	7,700
Northampton Related Development Area	24,127	28,458	31,160
South Northamptonshire (Excluding the NRDA)	5,336	6,318	6,880
<b>West Northamptonshire Total*</b>	<b>35,380</b>	<b>41,760</b>	<b>45,740</b>

\* Figures do not fully reflect Table 7 due to rounding

**The Proposed Main Modifications to the Pre-Submission Joint Core Strategy as submitted – An Introduction**

5.1 At the Hearing Sessions in April and May a number of possible Main Modifications were considered and discussed in order to ensure compliance with the National Planning Policy Framework and to address representations. The JPU has worked with the Partner Councils on the wording of these Proposed Main Modifications as well as additional Proposed Main Modifications that arise from the further work requested by the Inspector. These Proposed Main Modifications have also been prepared in accordance with advice from Queen’s Counsel.

The Proposed Main Modifications

5.2 The Joint Core Strategy, as submitted, sets out a vision for the West Northamptonshire area in 2026, now proposed to be modified to 2029, and that vision, and the spatial strategy that underpins it, is unchanged by the Proposed Modifications.

5.3 The Proposed Modifications to the Joint Core Strategy, as submitted, are divided into Minor and Main Proposed Modifications. The Minor ones are those which, for example, correct typographical errors or update factual information. The following paragraphs summarise the Main Modifications to the Joint Core Strategy, as submitted, by section of the document; The full list of Proposed Modifications may be found at Appendix 1 to this report.

Plan Period

5.4 Firstly, due to the fact that it is likely that the Joint Core Strategy will now be adopted in 2014, a 12 - year plan period from date of adoption, it is proposed to extend the plan period of the Joint Core Strategy by 3 years from an end date of 2026 to 2029. This is due to the need to respond positively to the National Planning Policy Framework that expresses a strong preference for a 15 year plan period. This is explained in more detail in paragraphs 5.22 – 5.28 below.

The Spatial Strategy

5.5 The Spatial Strategy remains unchanged (other than rewording) to update this section and especially to update housing and employment figures. In the light of the proposed extended Plan period, it is proposed that the Strategy makes provision for around 59,000 new homes between 2001 and 2029. This is a substantial reduction from the former East Midlands Regional Spatial Strategy (RSS) requirement of 62,125 to 2026. Over 18,000

new homes have already been built in the plan period up to 31<sup>st</sup> March 2013. Also, planning permission is in place for a further 9,700 homes. Therefore, the Strategy is planning for a further 31,300 to be granted planning permission and be built before the end of the extended plan period in 2029. The Strategy also, in-parallel, makes provision for a minimum net increase of some 28,500 jobs between 2008 and 2029 across the Plan area and aims to maintain a broad balance between homes and jobs overtime.

- 5.6 The hierarchy of towns and centres, together with the spatial distribution of development between these places is unaltered in the Strategy. This includes maximising the use of land and buildings within existing urban areas and by developing new Sustainable Urban Extensions (SUEs). Proposed Main Modifications to the SUEs are set out in more detail in paragraph 5.17 below.

#### Sustainable Development

- 5.7 The overall aim of the Proposed Modifications to the Strategy is to deliver sustainable development. This aim continues and is supported by the Proposed Modifications which ensure that the policy framework is robust and in accordance with the National Planning Policy Framework (NPPF).
- 5.8 It is proposed to include a new policy as part of the Proposed Modifications setting out the presumption in favour of sustainable development in accordance with the provisions of the NPPF.
- 5.9 The Proposed Modifications include amendments to Policies S3, 4, 5, 7, 8, 9 and 10. Regarding Policy S3, figures have been revised to reflect the objectively assessed housing needs. These needs are explained in more detail in Section 4 above of this report. Policy S4 has been updated to reflect the outcome of this objectively assessed housing needs work for the Northampton Related Development Area. Policy S5 has also been updated to reflect the resulting modified spatial distribution of development across the SUEs, and in terms of the delivery of the new housing and jobs that are needed in the extended plan period to 2029. Policy S7 has been updated to include the updated jobs needs up to 2029. Policies S8, 9 and 10 have all been adjusted to reflect the NPPF.

#### Economic Advantage

- 5.10 A central and enduring theme of this section is to secure the economic stability and prosperity of the Plan area through enabling a plentiful and varied range of job opportunities to be made available.
- 5.11 The Proposed Modifications make provision for 28,500 new jobs, increased from 19,000 in the submitted Plan, a 9,500 increase. Employment policies relating to Northampton and Daventry continue to focus on regeneration, renewal and jobs growth. Policy E1 has been further strengthened in that it now provides greater flexibility in the range and type of employment generating uses that can be considered within existing employment areas.
- 5.12 It is proposed to add a new policy to allocate a new strategic employment site near Northampton at Junction 16 of the M1 to meet the employment needs of Northampton in the extended plan period to 2029. The site will provide a range and mix of employment opportunities to ensure the site responds to and satisfies the needs of the expanding town through this plan period.

#### Housing

- 5.13 The Proposed Modifications to this section reflect the updated housing need emerging from the objectively assessed housing needs work. Policy H1 is updated and now incorporates the provisions of Policy H4, which it is proposed to delete. Policy H7 has been updated in the light of up to date needs evidence.

### Built and Natural Environment

- 5.14 This section still contains a range of policies covering topics such as; biodiversity, green infrastructure, landscape, heritage assets, water, pollution control and ground stability. Policy BN3, relating to woodlands, has been strengthened to conform to the NPPF.
- 5.15 It is proposed to modify Policy BN5 in order to clarify the approach to be taken to landscape, particularly landscape sensitivity.
- 5.16 Both Policies BN7 and BN7A relating to Flood Risk, Water Supply, Quality and Wastewater Management are to be strengthened.

### Sustainable Urban Extensions (SUEs)

- 5.17 A key tenet of the Strategy is to deliver new development that is needed in the form of SUEs. In the submitted Plan there were twelve SUEs across the Plan area: eight at Northampton, two at Brackley and one each at Towcester and Daventry. There are some detailed Proposed Modifications to some of these SUEs as follows:

#### Northampton

- Northampton North SUE: increased by 1,500 dwellings to a total 3,500 with 10 hectares of employment land for local employment opportunities.
- Northampton West SUE: increased by 1,050 dwellings to a total of 2,550.
- Northampton South of Brackmills SUE: increased by 300 dwellings to a total of 1,300 dwellings and make provision for an additional green corridor on the eastern boundary of the site.
- Northampton Norwood Farm/ Upton Lodge SUE: formerly a planning commitment which it is now proposed to allocate as an SUE. The total capacity of the SUE is proposed to be 3,500 dwellings: an increase of 1,000 dwellings on the former planning commitment. The SUE will also provide local employment opportunities.
- The other four SUEs around Northampton remain as in the submitted Joint Core Strategy.

#### Daventry

- Daventry North East SUE: Policy wording amended to reflect the Plan period extension but no change to the overall amount of development proposed.

#### Towcester

- Towcester South SUE: Policy wording amended to reflect the Plan period extension but no change to the overall amount of development proposed. Incorporate a reference to the need to improve the A43 junctions and remove the reference to the need for a new secondary school to serve the needs of the site.

#### Brackley

- Brackley East SUE: Policy wording amended to enable a more flexible range of employment generating uses. A reference to the need to improve the A43 junctions is also incorporated;
- Brackley North SUE: A reference to the need to improve the junction with the A43 is also incorporated.

### Rural Areas

- 5.18 Proposed Modifications to Policy R1 will provide opportunities for additional housing and employment to be sensitively provided across rural areas at a scale that serves their

specific needs and supports the retention and future provision of local services and facilities.

Monitoring and Implementation

- 5.19 The main modification relates to Policy S6 and reflects the comments made by the Inspector at the hearings in April. The Joint Core Strategy, as submitted, included phasing tables within the policy text, which the Inspector considered could be used to constrain potential development, and would therefore be contrary to the spirit of the NPPF. He did, however, agree that an indication of phasing could be a useful aid to monitoring progress of the plan. The two tables have therefore been removed from the policy text but have been included in the supporting text to the policy.
- 5.20 In addition, the supporting text explores and clarifies the difference between the housing “need” figure and the “delivery” figure, which is higher, and clarifies that the 5 year land supply calculation should be calculated against the “need” figure rather than the “delivery” figure. This has been added as a bullet point to the policy text.
- 5.21 On a plan-wide scale, the following key Proposed Main Modifications are of particular note:
- Plan Period;
  - Housing Requirements and Spatial Implications; and
  - Job Requirements and Spatial Implications.
- Plan Period
- 5.22 At the JCS Examination Hearings the Inspector asked the JPU to consider the implications of two alternative plan period end dates: 2029 and 2031.
- 5.23 Paragraph 157 of the National Planning Policy Framework (NPPF) states that Local Plans should: “be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;”.
- 5.24 It is now expected that the Joint Core Strategy will be adopted in Autumn 2014. The plan period in the JCS (as submitted) extends to 2026 which means that the time horizon from adoption is only 12 years. The JCS (as submitted) does provide a longer framework than 2026 in terms of the spatial vision which does not specify an end date but rather refers to “our vision of the future”. However, clearly it has taken longer than originally anticipated to prepare the West Northamptonshire Joint Core Strategy and consequently the time horizon has unfortunately being shortened from that originally intended.
- 5.25 In preparing the objectively assessed housing need the JPU has identified the housing and job requirements for the existing plan period end date of 2026 and the two alternative plan period end dates: 2029 and 2031.
- 5.26 Given the large difference in the projections provided by the JPU’s consultants, and the recommendations from both the Office for National Statistics and the Department for Communities and Local Government that neither the 2011 based projections or the 2008 based projections should be used for making projections beyond 2021, the JPU has real concerns about extending the Plan period too far. Furthermore, as population and household projections are a key input to much of the evidence base, especially transport, education and community facilities, a shorter extension of the Plan period would better reflect the current evidence base.
- 5.27 ***Consequently, for the reasons set out in Paragraphs 5.24 - 5.26 above, the JPU are recommending that an extension of the Plan period to 2029 is preferable to an extension to 2031.***

- 5.28 *In the light of the recent and on-going economic challenges the JPU also recommends that it is prudent to additionally make a clear commitment to undertaking a review of the JCS with the aim of having an adopted plan in place by 2020. The principle of this review is supported by the Partner Councils.*

Housing Requirements and Spatial Implications

- 5.29 Table A in Paragraph 4.18 above of this report sets out the housing requirements by district and Northampton Related Development Area at 2029 and 2031.
- 5.30 For the purposes of the Joint Core Strategy the JPU has updated the anticipated supply of housing to 2013 including new completions, new permissions, reconsidering the urban capacity estimates and the rural allowance. This anticipated supply has then been deducted from the total requirement to establish how much additional housing is required in each district and the Northampton Related Development Area.
- 5.31 As a result of the Objectively Assessed Housing Need work there are some minor changes to the spatial distribution, as there is slightly more emphasis on Northampton as the focus of development. Also, because of the level of new permissions which have been granted consent in the rural areas (sometimes by the Inspectorate on appeal) there is a requirement to reconsider the rural allowances made in the Proposed Changes to the Pre-Submission Joint Core Strategy.
- 5.32 The implications of extending the plan period also varies across the area, as both Daventry and Towcester towns have JCS allocations which extend beyond 2026, and which can therefore contribute towards meeting an additional requirement needed for 2026-2029. This is not the case in Northampton, where all of any additional requirement needed for the period 2026-2029 would have to be in the form of further allocations.
- 5.33 Taking all these factors into account, and based on all the existing allocations coming forward, the additional requirement at 2029 and 2031 is set out below in Tables B and C:

**Table B - The Additional Housing Requirement at 2029**

<b>Plan period to 2029</b>	<b>Daventry District (Excluding the NRDA)</b>	<b>NRDA</b>	<b>South Northants (Excluding the NRDA)</b>
<b>Supply 2011-2026 <sup>2</sup></b>	6,075	23,014	6,425
<b>Additional urban capacity</b>	100	1,300	100
<b>Additional rural allowance</b>	150	0	75
<b>Additional delivery on SUEs post 2026</b>	600	0	600
<b>Total Supply</b>	6,925	24,314	7,200
<b>Cambridge requirement</b>	6,984	28,458	6,318
<b>Shortfall/ Surplus</b>	<b>- 59</b>	<b>- 4,144</b>	<b>+ 882</b>

<sup>2</sup> Currently the supply between 2011-2026 includes the Sustainable Urban Extensions (SUEs) allocated in the JCS as submitted.

**Table C - The Additional Housing Requirement at 2031**

<b>Plan period to 2031</b>	<b>Daventry District (Excluding the NRDA)</b>	<b>NRDA</b>	<b>South Northants (Excluding the NRDA)</b>
<b>Supply 2011-2026<sup>3</sup></b>	6,075	23,014	6,425
<b>Additional urban capacity</b>	150	1,500	150
<b>Additional rural allowance</b>	250	0	125
<b>Additional delivery on SUEs post 2026</b>	1,000	0	1,000
<b>Total Supply</b>	7,475	24,514	7,700
<b>Cambridge requirement</b>	7,700	31,160	6,880
<b>Shortfall/ Surplus</b>	<b>- 225</b>	<b>-6,646</b>	<b>+820</b>

- 5.34 The figures clearly indicate that no additional land is required in South Northamptonshire district to meet South Northamptonshire's needs, and the surplus gives assurance in the event of delays in the progress of sites.
- 5.35 Daventry is only slightly below requirement, and this could be made up through an allowance for development on sites of fewer than 10 dwellings that are not included as part of the strategic requirement.
- 5.36 The most significant shortfall is the additional requirement for Northampton's needs, which amounts to more than 4,000 dwellings in the three year period 2026-2029. This inevitably means that additional strategic sites need to be allocated, and for these to deliver sufficient homes during the period 2026-2029, these sites will need to be consented by 2021-2022 and construction started on site by 2024-2025.
- 5.37 The JPU has undertaken a fresh site selection exercise for the Sustainable Urban Extension (SUE) sites around Northampton, Daventry, Towcester and Brackley on a comparative basis and in the light of the reassessed housing needs of the area. The West Northamptonshire Joint Core Strategy Strategic Site Selection Report published alongside this Committee paper sets out the strategic site selection methodology, the conclusions and the reasons for selection and rejection of alternatives (See Section 6 of this report for further information).
- 5.38 The overall conclusions of this exercise are that there should be no change to the SUE allocations at Daventry, Towcester or Brackley.
- 5.39 In relation to Northampton it is proposed that the following SUEs remain unchanged:
- Northampton Kings Heath;
  - Northampton North of Whitehills;
  - Northampton South; and
  - Northampton Upton Park.

<sup>3</sup> Currently the supply between 2011-2026 includes the Sustainable Urban Extensions (SUEs) allocated in the JCS as submitted. .

5.40 It is proposed to extend three SUEs at Northampton as follows:

- Northampton North (increased by 1,500 dwellings to 3,500 dwellings and 10 ha employment);
- Northampton South of Brackmills (increased by 300 dwellings to 1,300 dwellings): and
- Northampton West (increased by 1,050 dwellings to 2,550 dwellings).

5.41 It is proposed to allocate one additional SUE at Northampton that was previously a planning commitment known as Northampton Norwood Farm/ Upton Lodge and increase it to 3,500 dwellings (an increase of 1,100 on the existing commitment).

#### Job Requirements and Spatial Implications

5.42 The current evidence base suggests that there is sufficient employment land within the development pipeline to meet the revised jobs figures set out in Tables 7 and 8 in Paragraph 4.13 of this report in purely numerical terms. However, both the revised 2029 and 2031 jobs requirements may be difficult to achieve within that anticipated pipeline while maintaining a choice of sites and maintaining a healthy “churn” of sites and premises. In addition, a review of the evidence and a comparison with recent enquiries, suggests that there is a potential shortfall within Northampton of larger sites for existing large companies who wish to expand. There is therefore a good case for allocating one strategic employment site in the period to 2029 to ensure a good supply of sites is maintained throughout the plan period. In addition, Proposed Modifications to the JCS also enable the identification of small strategic extensions to existing employment areas where these are deemed sustainable; the allocation of such sites will be facilitated in Part 2 Local Plans, such as the Northampton Related Development Area Local Plan, if they are not strategic in nature.

5.43 The JPU has undertaken a fresh site selection exercise for strategic employment sites in West Northamptonshire on a comparative basis and in the light of the reassessed jobs needs of the area. The West Northamptonshire Joint Core Strategy Strategic Site Selection Report published alongside this Committee paper sets out the strategic employment sites selection methodology, the conclusions and the reasons for selection and rejection of alternatives (See Section 6 of this report for further information). The conclusions of this exercise are that it is proposed that a Strategic Employment Site should be allocated at Junction 16 to meet the needs of the Northampton Related Development Area.

#### Equalities Impact Assessment

5.44 The Proposed Main Modifications to the Joint Core Strategy (as submitted) are subject to an on-going Equalities Impact Assessment (EqIA). The purpose of the EqIA process is to identify whether the plan has an adverse impact on equality of opportunity on the basis of a person’s race, gender, disability, sexuality, religion or belief or age or on relations between or within those groups, and how this can subsequently be addressed. The EqIA will be published alongside the Proposed Main Modifications to the Joint Core Strategy (as submitted) to allow respondents to the Proposed Modifications to reflect on this assessment in preparing their representations and to make any observations on the assessment itself.

#### Publication Format

5.45 The Proposed Main Modifications, only, will be published for representations in a series of tables, or Schedules, with one table per section of the JCS. Each Schedule will show the Proposed Main Modifications as tracked changes to the reasoned justification and/ or policy text of the JCS. The reason/s for the Proposed Main Modification will also be included in the Schedules. The tracked changes version of the Pre-Submission JCS, incorporating the Proposed Changes and the Proposed Modifications, will also be

published on the JPU website for reference purposes only. The Schedules of the Proposed Modifications are attached to this report as Appendix 1.

## **6. Sustainability Appraisal/ Strategic Environmental Assessment (SA/ SEA) Addendum Report and Habitats Regulations Assessment**

- 6.1 Independent consultants LUC were appointed by the JPU to undertake the Addendum to the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Report for the West Northamptonshire Joint Core Strategy and the Habitats Regulations Assessment (HRA).
- 6.2 LUC prepared an addendum to the existing SA Scoping Report that focused on the work required of the SA Addendum. The Scoping Report Addendum was subject to five weeks consultation (as required by the SEA Regulations) between the 25 July and the 30 August 2013. The purpose of the consultation on the scope of the SA was to give an opportunity to comment on the scope of the work to be undertaken and the level of detail of the appraisal work. The consultation responses received were processed by the JPU and sent to LUC for their consideration. The SA Addendum Scoping Report Statement of Consultation has been published and is available on the JPU website as part of the background material to this report.
- 6.3 The SA Addendum Report and the SA Addendum Non-Technical Summary have now both been published and are available on the JPU website as part of the background material to this report. There now follows a summary of the findings of this report prepared by independent consultants, LUC.
- 6.4 The SA Addendum Report has sought to identify the effects of a range of alternatives to the Joint Core Strategy (JCS), as submitted, in order to ensure that the final adopted JCS will be the most sustainable one for West Northamptonshire.
- 6.5 The SA Addendum work builds on the earlier SA work on the JCS as submitted. It is not intended to replace the earlier SA work, but to supplement it, by providing further more detailed assessment as necessary in order to help the Joint Strategic Planning Committee make its decisions.
- 6.6 The SA Addendum work has involved close working between LUC, as the appointed SA consultants, and the JPU, with the findings of the SA work feeding into the decision-making process throughout. The SA Addendum work takes into account the proposed extension to the end date of the JCS plan period from 2026 to 2029. It has also taken into account up-to-date evidence on the objectively assessed housing and jobs provided by independent consultants, plus other technical studies as relevant.
- 6.7 The aim of the SA Addendum work has been to be as objective and consistent as possible. It used the same SA objectives that were developed for the earlier SA work up until submission of the JCS in December 2012. However, the work on the SA Addendum has been in much more detail than the earlier SA work drawing on up-to-date evidence base, using Geographical Information Systems (GIS) techniques for analysis of data, and using a new and comprehensive set of assumptions to underpin judgements of effects.
- 6.8 Although the SA has considered the sustainability effects of all the Proposed Main Modifications, the primary focus of the work has been on the SUE alternatives that are needed at the four main towns of Northampton, Daventry, Towcester and Brackley.
- 6.9 To ensure that all reasonable alternatives were subject to SEA on a consistent basis, a full and thorough assessment of the potential to act as SUEs of all the undeveloped areas adjoining each of the four towns was undertaken. The only exceptions were those areas that were considered not to be reasonable alternatives under policy guidance contained in the NPPF, or because they did not meet the objectives and strategy of the JCS as submitted. In practice, this meant that there was almost complete coverage of the areas surrounding all four towns.

- 6.10 In turn, this meant that those areas already allocated as SUEs in the JCS as submitted were re-assessed, plus alternative areas put forward by other stakeholders, and sites identified through the SHLAA process.
- 6.11 It was from this comprehensive and detailed work, and the additional technical work gathered by the JPU, that the Preferred Choice that is presented in the Proposed Main Modifications was prepared by the JPU for consideration by the West Northamptonshire Joint Strategic Planning Committee.
- 6.12 As explained in the Strategic Site Selection Report the JPU considered all other options would have either unacceptable impacts or would be undeliverable over the plan period for a variety of reasons, taking into account all the SA and other technical work it had at its disposal.
- 6.13 The SA carried out an assessment on an equivalent basis of the alternative approach to SUEs at Northampton put forward by Northamptonshire County Council. This alternative would have meant deleting two SUEs (Northampton South and Northampton West), and expanding Northampton North SUE by the equivalent amount of housing (2,500 dwellings). The assessment found that although the areas of greenfield land to the west and south of Northampton would remain undeveloped and the potential positive and negative effects of the Northampton West, Northampton South SUEs would therefore not occur, the significant effects identified for Northampton North would extend over a greater area.
- 6.14 In addition to the SUEs, the SA also assessed reasonable alternative strategic employment sites, including the new M1 Junction 16 site that is included in the Proposed Main Modifications, and two potential new settlement alternatives. With respect to the Junction 16 strategic employment site, potentially significant negative effects were identified with respect to landscape and air quality and noise, although its potential for negative effects on biodiversity were considered to be less than any of the other alternatives considered. With respect to the new settlement alternatives, it was found that they had generally less positive sustainability effects than the preferred approach in the JCS of focusing development within and adjoining the urban areas.
- 6.15 The objectively assessed housing and jobs needs work has indicated that a very significant amount of development is required in the JCS area. Delivery of this development will have significant positive social and economic effects. The SA Addendum work has confirmed that there are no alternatives for delivering the scale of development needed in the JCS area without some significant negative effects occurring. Given that it is impossible, and probably undesirable in sustainability terms, to concentrate even more development within the urban areas than is presented in the Proposed Main Modifications, it is inevitable that greenfield land will need to be developed. This in turn will mean that there will be some significant negative effects on the landscape, biodiversity and cultural heritage, both for some individual SUEs but also cumulatively across the JCS area as a whole. Mitigation can be provided through high quality design, the provision of green infrastructure including habitat creation, encouragement of sustainable modes of transport, and the development of balanced neighbourhoods integrated with existing development. But effects will still occur, wherever the development takes place.
- 6.16 The SA Addendum has identified the effects of developing in different locations in the JCS area, primarily around the four main settlements, and the JPU in turn has sought to avoid where possible the most sensitive environmental locations, but also having to be guided by other factors (e.g. transport implications). For example, the JPU has deliberately avoided choosing locations for SUEs that could affect the integrity of the internationally important Upper Nene Valley Gravel Pits nature conservation site. This does not mean that all potentially sensitive locations have been avoided, but it is reasonable to conclude that the alternatives would also result in significant effects, although they would be experienced in different locations.
- 6.17 The earlier SA work on the JCS as submitted identified a number of potential cumulative effects. In addition to the cumulative effects identified in the earlier SA work, there is the

potential for cumulative effects arising from the proposed strategic employment site at Junction 16 on air quality and noise associated with traffic using the M1. There is also the potential for cumulative effects of increasing the amount of development to be delivered through 'urban capacity' sites (likely to be a large number of smaller sites) on the townscape of Northampton and flood risk of both existing and new development. The overall increase in development in the Proposed Main Modifications will inevitably put pressure on natural resources, and in this respect there could be cumulative significant negative effects on the achievement of Water Framework Directive objectives and targets.

- 6.18 By way of conclusion to this summary of the SA Addendum report, in the light of all that has been considered the spatial distribution of development and the sites selected for development across the West Northamptonshire Joint Core Strategy plan area is considered by the JPU to be the most reasonable and most appropriate in sustainability terms. Therefore, the Joint Core Strategy, as proposed to be modified represents the most sustainable strategy available for this area.

## **7 Habitats Regulations Assessment (HRA) Addendum**

- 7.1 The Habitats Regulations Assessment (HRA) Screening of the Proposed Main Modifications to the Joint Core Strategy, as submitted, revealed that likely significant effects cannot be ruled out on Rutland Water Special Protection Area and Ramsar site and on the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site. However, more detailed Appropriate Assessment of these effects did not identify any adverse effects on the integrity of either of these European sites. No impact avoidance measures put forward by the preceding HRA work remain outstanding. The overall conclusion of the HRA of the Pre-Submission Joint Core Strategy, as amended by the HRA Addendum for the Proposed Changes to the Joint Core Strategy is that the Joint Core Strategy, as amended by the Proposed Main Modifications, will not result in adverse effects on the integrity of any European site.
- 7.2 The HRA Addendum Report, including the HRA Addendum Non-Technical Summary, has now been published and is available on the JPU website as part of the background material to this report.

## **8 Communication and Consultation Strategy**

- 8.1 A proposed Communication and Consultation Strategy for the Proposed Main Modifications to the Joint Core Strategy (as submitted) is attached to this report as Appendix 2. The Strategy sets out the proposed arrangements for communication and consultation with the local community and all other stakeholders in respect of the Proposed Main Modifications. The Strategy meets the requirements of the Statements of Community Involvement adopted by the Partner authorities.

## **9 Next Stages**

- 9.1 The Proposed Main Modifications to the Joint Core Strategy (as submitted) will be subject to public consultation for six weeks. Also the subject of public consultation will be
- The Objectively Assessed Housing and Jobs Needs;
  - The Sustainability Appraisal Addendum Report; and
  - The Habitats Regulations Assessment Addendum Report.
- 9.2 This consultation will be in accordance with the EAPP Regulations and reflect the consultation requirements of the Town and Country Planning (Local Planning) Regulations 2012 and the Joint Core Strategy Examination Inspector's requirements.
- 9.3 The Inspector has agreed with the JPU and other interested parties attending the Hearings that there should be up to a further three days of Hearings to consider the

outcomes of the further work and the responses to the consultation. All those who attended the relevant Hearing sessions held to date will be invited to attend again. The Inspector will decide the programme, subject matter and issues for each further session in due course, once the additional work has been completed. The further Hearings will be taking place between the 18 - 20 March 2014 at the Northampton Saints Conference Centre in Northampton.

## **BACKGROUND PAPERS**

**All the Background Papers listed below are available to read and download from the West Northamptonshire Joint Planning Unit website:**

**[www.westnorthamptonshirejpu.org](http://www.westnorthamptonshirejpu.org) or on request from the Joint Planning Unit.**

- Employment Technical Paper Second Update (December 2013)
- Habitats Regulations Assessment of the West Northamptonshire Joint Core Strategy Addendum Report (December 2013) – including the Non-Technical Summary
- Housing Technical Paper Second Update (December 2013)
- Objectively Assessed Housing Need Technical Paper Version 2 (December 2013)
- Sequential and Exception Test - Technical Note Second Update (December 2013)
- West Northamptonshire Joint Core Strategy Strategic Site Selection Report (December 2013)
- West Northamptonshire Joint Core Strategy Infrastructure Delivery Plan Update 2013 (December 2013)
- West Northamptonshire Joint Core Strategy Sustainability Appraisal Addendum Scoping Report (July 2013)
- West Northamptonshire Joint Core Strategy Sustainability Appraisal Addendum Scoping Report Statement of Consultation (December 2013)
- West Northamptonshire Joint Core Strategy Sustainability Appraisal Addendum Report (December 2013)
- West Northamptonshire Joint Core Strategy Sustainability Appraisal Addendum Report – Non-Technical Summary (December 2013)
- West Northamptonshire Strategic Housing Market Assessment Update Note (October 2013)
- West Northamptonshire Travellers Accommodation Needs Study (April 2013)

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