## 4<sup>th</sup> November Cabinet Report Appendix 2

#### **CAAP Statutory Consultees Responses**

West Northamptonshire Development Corporation (WNDC) Response Summary (considered by Board on 15-09-09)
English Heritage (EH)
Network Rail – no comments
Government Office for the East Midlands

Government Office for the East Midlands (GOEM)

Northamptonshire County Council – Policy (NCC)

Northamptonshire Enterprise Limited (**NEL**)

Homes and Communities Agency (**HCA**)
Sport England (**SE**)
Disabled Persons Transport Advisory
Committee (**DPTAC**)
Highways Agency (**HA**)

East Midlands Regional Assembly (EMDA)

Environment Agency (**EA**)
Hardingstone Parish Council
Little Houghton Parish Council

Northamptonshire Police (**NP**)

This paper provides an overview of highlights from statutory consultee's responses to the consultation on the Emerging Strategy to the Central Area Action Plan. It does not provide a comprehensive view of the details contained within the responses but looks to provide a summary of pertinent points in going forward with producing the Action Plan.

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## General

| WNDC       | Need to provide a programme to them identifying the key stages in  |
|------------|--|
|            | reaching Submission for their own work programme.  |
| WNDC       | Concerns about the development of a Transport Strategy – time short, NCC need to recognise importance and allocate adequate resources.         |
| GOEM       | Timing – generally difficult to examine other development plan documents   |
|            | ahead of a core strategy; can do it if housing need or urgently required   |
|            | regeneration package.  |
|            | Need to be set out in a revised LDS to link chain of conformity to RSS   |
|            | rather than JCS.   |
| NCC-Policy | Links between CAAP and JCS. Emphasise the relationship with the WN   |
|            | County and Sub-Region.   |
|            | Be clear about infrastructure needed to raise the status of the town centre,   |
|            | and deliver the development envisaged and the extent to which current  |
|            | deficits will also be addressed.   |
|            | Provide clear guidance on how existing built up areas can profit from an   |
|            | urban renaissance of the Central Area. Don't include details about   |
|            | evidences base and genesis of CAAP.  |
|            | All sites identified should have been subject to robust assessments as to the likelihood of delivery and successful implementation (because of |
|            | likelihood to incur blight)  |
|            | All sites subject to archaeological assessment   |
| Police     | Broad principles of Police for any planning policy document – detailed in  |
| 1 01100    | response.  |
|            | Have done a town centre audit on behalf of Town Centre Violence Group  |
|            | (Debbie Ferguson has a copy) – needs to be integral to improving the offer   |
| DPTAC      | 4 principles:  |
|            | accessibility for disabled people is a condition of investment;  |
|            | accessibility for disabled people must be a mainstream activity;   |
|            | users should be involved in determining accessibility;   |
|            | Achieving accessibility or disabled people is the responsibility of the  |
|            | provider.  |
| HA         | Safeguard Strategic Road Network – particularly M1 and A45   |
|            | There are new goals for transport (CAAP contains old ones) contained   |
|            | within Delivering a Sustainable Transport System, Department for   |
|            | Transport, Nov 08. Primarily to support economic growth and combat climate change.   |
|            | Absence of reference to capacity assessments of highway network and a  |
|            | transport evidence base to underpin the CAAP.  |
|            | Statement to accommodate car drivers is inappropriate and doesn't take   |
|            | account of existing travel conditions.   |
|            | The plan should promote a more sustainable approach to addressing  |
|            | commuter trips.  |
|            | By placing emphasis on public transport improvements later in plan it  |
|            | doesn't demonstrate that the development to be delivered will be served by   |
|            | sustainable forms of travel in the short term.   |
| Sport      | Disappointed that benefits of sport having regard to community cohesion  |
| England    | and regeneration of the City Centre do not form a more substantial part of   |
|            | CAAP (also raised in Nov 2007).  |

|                 | Of the property of the second |
|-----------------|---|
|                 | Strong emphasis on designing quality places and the promotion of walking  |
|                 | and cycling is supported.   |
|                 | National Sports Strategy, 'Game Plan' has been replaced by Sport  |
|                 | England's Strategy 2008-2011.   |
|                 | Change 4 Sport, the East Midlands Sports Strategy has been replaced by  |
| EMPA            | the new national strategy but will not be updated.  |
| EMRA            | Clearly and succinctly sets out the emerging strategy proposed to enable the regeneration of Northampton.   |
|                 | Comments form context of regional principles and not appropriate to   |
|                 | comment on individual sites.  |
|                 | Bring forward retail, office, residential and leisure opportunities and any   |
|                 | other town centre functions as set out in PPS 6 based on identified need.   |
|                 |   |
|                 | Plans to encourage re-use of vacant land and buildings within urban areas   |
|                 | accords with Policy 17 and Policy 3 which sets out sequential approach to   |
|                 | development focussed on urban concentration that forms overarching  |
| Covironment     | framework for location of future development activity.  |
| Environment     | Supporting evidence base and policy require substantial improvement to address primary soundness concerns on certain aspects. Object on   |
| Agency          | ' '   |
|                 | grounds of soundness to progression to submission unless fully supported  |
|                 | and informed by Strategic Flood Risk Assessment, Water Cycle Strategies.  Object to allocation of development within Flood Zones 2 and 3.   |
|                 | '   |
|                 | Anglian Water Services Ltd should be consulted and requested to   |
|                 | demonstrate that sewerage and sewage disposal systems serving the   |
|                 | CAAP will have sufficient capacity to accommodate the additional flows  |
|                 | generated as a result of development, without causing pollution or flooding.  |
| Considerate and | New development to Flood Zone 1 (sequential test).  |
| Environment     | Willing to be involved in assessment against sustainability criteria of site  |
| Agency          | specific proposals received during the consultation.  |
|                 | No mention of how developments are likely to impact on species inhabiting   |
|                 | the area as a result of increased activity / disturbance, e.g. bats.  |
|                 | References to Bats and Lighting in the UK.  |
| Environment     | Needs to be more engagement with the Environment Agency. Meet at  |
| Agency          | earliest opportunity.   |
| Little          | We do not agree with the overall Emerging Plan for the Central Area but   |
| Houghton        | would like to see the inner area of Northampton regenerated.  |
| Parish          | Technology and scientific research will have moved on dramatically by   |
| Council         | 2026 - how can we predict that people will still want or need the same  |
|                 | things as today?  |

## 2 Vision

| WNDC       | Ensure aligned with JCS – particularly strategic issues such as transport,  |
|------------|---|
|            | employment provision, retail and residential.   |
| English    | Broadly support.  |
| Heritage   | Plan needs to be underpinned by an understanding of the historic  |
|            | environment, archaeology, morphology and buildings.   |
| GOEM       | Support   |
| NCC-Policy | Set out spatial priorities but not go into too much detail about individual proposals   |
|            | Define distinction between central area and town centre   |
|            | Comprise a structure that places strategic and topic based policy matters   |
|            | first, with detailed proposals for sites set out afterwards.  |
|            | Schools sites required for Nunn Mills and Ransome Road, other new   |
|            | housing will create pressures on already pressured system.  |
| NEL        | Support.  |
|            | Align with JCS.   |
|            | Consider regional centre for leisure, retail and other employment uses.   |
|            | Note that delivery of successful Central Area will play key role in delivering  |
|            | job growth.   |
| Police     | Lack of consideration of 'safe and secure' in vision and needs to be rolled out throughout the document with details of how it will be delivered. |
| HCA        | No mention of sustainability, energy efficiency, high quality design and  |
| 1.071      | public realm – doing so would strengthen the vision.  |
| HA         | Support general direction.  |
| EMRA       | Strong accord with RSS and 11 Core Regional objectives in Policy 1  |
| EA         | Include key messages in the vision to highlight commitment to adapting  |
|            | and mitigating against climate change.  |
|            | Promote the use of SUDS   |

# 3 Strategic Objectives

| English    | Don't support  |
|------------|--|
| Heritage   | PPS1, 3, 15 – full assessment of individual sites should underpin further    |
|            | policy and development control decisions.                                    |
|            | Welcome clear definition of tall buildings – agree accords with CABE/EH      |
|            | guidance.  |
| NCC-Policy | Objectives must link to and cascade from JCS                                 |
| Police     | Support.   |
|            | Encourage engagement with the force through the Crime Prevention Design      |
|            | Advisors to ensure that issues of providing safe environments are included.  |
| HCA        | Support  |
| HA         | Support general direction  |
| Sport      | Should include ability to maximise the opportunities for and the benefits of |
| England    | sport in the community and to integrate future developments with the         |
|            | existing community – Shaping Places through Sport emphasise this             |
|            | opportunity.   |
| EMRA       | Strong accord with RSS and 11 Core Regional objectives in Policy 1           |
| Little     | Need to enhance the central shopping area of Northampton by encouraging      |
| Houghton   | individual shops.  |
| Parish     | Due to its central position in the County, its historic ties and wonderful   |
| Council    | countryside tourism should be encouraged to provide employment.              |

### 3.1 Objective 2

| English<br>Heritage | No reference to maintaining architectural heritage. Need a specific objective or reword Objective 2: To ensure new design is of the highest |
|---------------------|---|
| - romago            | standard that reflects the rich architectural heritage and adds to the sense  |
|                     | of place and to ensure that the heritage assets of the area are protected   |
|                     | and enhanced and continue to contribute to its distinctive character.   |

#### 3.2 Objective 5

| 14/100   |   |
|----------|---|
| WNDC     | Broaden to ensure Transport section includes all forms of transport.        |
|          | Needs to cover the impact of car, in addition to public transport, walking. |
| Little   | We support Central area Action Plan on objective 5                          |
| Houghton |   |
| Parish   |   |
| Council  |   |

## 3.3 Objective 6

| Little   | We support Central area Action Plan on objective 6 |
|----------|--|
| Houghton |  |
| Parish   |  |
| Council  |  |

### 4 Retail - General

| WNDC | Relate convenience and comparison to wider town and JCS, particularly      |
|------|--|
|      | convenience provision and balance between Central Area and outside of it.  |
|      | Need more evidence for selection of sites (and why above other options)    |
|      | and information on deliverability.   |
|      | Food retail – must be clearly evidenced and shown to be deliverable within |

|            | the timescale of the plan - e.g. do the proposed sites meet the needs of       |
|------------|--|
|            | potential occupiers.   |
|            | Extent of it will be important in assessing future retail proposals.           |
| NCC-Policy | Highlight primary and secondary retail frontages on basis of future role       |
| NEL        | Support proactive engagement in retail market to attract a high quality offer. |
|            | SNEAP identifies potential activities that should be undertaken within         |
|            | Northamptonshire to further support town centre regeneration and               |
|            | development.   |
| Police     | Short term lease of empty shops to community groups – follows best             |
|            | practice guidance in DCLG 'Looking after our town centres'.                    |
| HCA        | Additional retailing development required in the centre.                       |
| HA         | Appropriate to retain retail spend.  |
|            | Support long term aim of restricting new retail development at retail parks    |
|            | on edge of urban area.   |
|            | Support encouraging mixed use development (other than retail) as retail        |
|            | parks located in less accessible areas than town centre.                       |
| EMRA       | Northampton has potential to become one of the Regions highest                 |
|            | performing retail attractions.   |
| Little     | To maintain that Northampton City in 2026 will be an area of shopping          |
| Houghton   | excellence is unrealistic. We should be looking at ways to compliment the      |
| Parish     | shopping experience offered by Milton Keynes. Embrace Northampton as a         |
| Council    | market town and build on this.   |

## 4.1 Nene Valley / St James

| English  | Nene Valley / St James mixed use – agree  |
|----------|---|
| Heritage |   |
| Police   | Any alterations must build on existing crime prevention in this area (was high crime 10 years ago). Support more mixed use. |
|          | Support more mixed use.   |
| HCA      | Needs to be supported by additional local community facilities.   |

### 4.2 North Abington Street / Horse Market / College Street

| English  | North of Abington Street – upgrade frontage, not suitable for supermarket.  |
|----------|---|
| Heritage | Could develop more sensitive mixed use.   |
|          | College Street and Horse Market – carefully integrate Grade II church   |
| Police   | Strongly agree with issues retail strategy identified. Support two locations  |
|          | identified for retail.  |
| EA       | Both lie in secondary aquifers so potential for land contamination from existing site use and design of foul and surface water drainage is Environment Agency priority. |
|          | Early liaison with Northampton Borough Council, Environment Agency and developers when dealing with land that may give rise or already be affected by contamination.    |

### 4.3 Retail through Intervention

| English  | Support.   |
|----------|--|
| Heritage | Need to address shop fronts and public realm.                                |
|          | Seek mechanisms for reuse of historic buildings, e.g. uses for upper floors. |
|          | Support shop front work. Did attempt to advise officers. Still willing to    |
|          | advise as very feasible if Council wishes to pursue.                         |

| Police | Shop fronts of high quality, lighting, management and maintenance of the  |
|--------|---|
|        | town all contribute to ensuring decline is halted.  |
| Police | Engage the Force's Crime Prevention Design Advisors.  |
|        | A policy that outlines the guidelines that need to be adhered to for any shop front.  |
| HCA    | Selective letting with improved contract terms - could encourage smaller independent traders.  Specific retail uses could be targeted.  Willing to provide further input in relation to retail and lettings strategy which is being formulated. |

## 4.4 High Quality Retailing

| English  | Support.  |
|----------|---|
| Heritage | Potential St George's Row, Mercers Row, Market Square and Bridge Street |
|          | for smaller independent retailers.                                      |
|          | Abington Street and Drapery have potential for larger commercial units. |

### 4.5 Primary and Secondary Frontages

| Police | Appropriate - need further detail on the levels of different uses that are |
|--------|--|
|        | acceptable along each frontage.  |

# 5 Town Centre Boundary

| WNDC    | Boundary in relation to retail – re-examine, not clear why extends around Castle Station or why encompasses the mainly residential areas at the end of Derngate. |
|---------|--|
| NEL     | Boundary appropriate including station.  |
|         | Consider role of St James and Nene Retail parks within centre, may be  |
|         | possible to better align with centre.  |
| Police  | Appropriate. Possibility Force may relocate from Campbell Square should  |
|         | include in the boundary. For the site to become vacant the Courts would  |
|         | need to be relocated.  |
| HCA     | Support, but boundary needs to accord with Ransome Road masterplan.  |
| Sport   | Boundary should include Nene Whitewater site to strengthen activity along  |
| England | river back to Becket's Park.   |

## **6 Office Developments**

| WNDC                | Support locations Emphasis need for further information re quantum of employment floor space and how links to JCS.  |
|---------------------|---|
|                     | Need to demonstrate that the sites put forward are deliverable and provide an indication of the expected levels of employment supply.   |
| English<br>Heritage | Important office developments don't have adverse effect on the attractive characteristics of the town.  Sorting office identified as suitable for tall buildings in Appendix B but Paragraph 3.79 indicates any building over 4 storeys is considered tall. Need design brief for site. |

#### 7 Creative Industries

| English The Mounts needs a strategy for conservation and promotion of | the |
|---|-----|
|---|-----|

| Heritage | remaining built boot and shoe heritage.                                       |
|----------|---|
|          | St Michaels Road has potential for creative industries – close to town centre |
|          | and adjacent to educational establishments.                                   |
| Little   | Graduates will not see Northampton as an easy option. Northampton will        |
| Houghton | have to compete with London, Birmingham, Oxford and Cambridge. There          |
| Parish   | is no mention of upgrading Northampton's rail links in the Central Area plan  |
| Council  | 2009.   |

### 8 Avon / Nunn Mills / Ransome Road

| NEL | Avon / Nunn Mills / Waterside / Castle Station are strongly supported. Royal Mail could be released for alternative uses. Cliftonville, Billing Road |
|-----|--|
|     | and York Road retained for B use employment and not released for other uses.   |
| EA  | Should be informed by Level 2 SFRA once complete and sequential and exception tests.   |

# 9 Broadening the Appeal of the Market Square

| English      | Not formally consulted on the emerging proposals for the Market Square.  |
|--------------|--|
| Heritage     | Historical research and character analysis should underpin any decisions |
|              | on its future.   |
| NEL          | Primary and secondary frontages should be highlighted on the basis of    |
|              | their future role.   |
| Hardingstone | Public houses with outdoor seating for eating. Remove the betting        |
| Parish       | shops/employment agencies.   |
| Council      |  |

# 10 Areas for Residential Development

| WNDC             | Support locations Need to identify capacity for these sites in relation to quantum's identified in JCS   |
|------------------|--|
| Police           | Appropriate. All new houses built to secured by Design standards. Welcome SPD for Spring Boroughs.   |
| HCA              | Welcome further references to community engagement throughout the CAAP.  |
| Sport<br>England | Sport can lead regeneration by engaging communities in the improvement of their area, creating employment and training opportunities – may be particularly relevant in Spring Boroughs.  In developing 2,000 dwellings use Open Space, Sport and Recreation Report findings.  Provision of sports facilities could help to integrate the proposed residential population with the existing.  Household survey in OSSR report identified a short fall in Synthetic Sports Pitches, Multi Use Games Areas and Tennis Courts. Access to outdoor facilities by public transport is a concern. Shortfall across the Borough of 20 Sports Halls; and a single 4 lane, 25m, pool. Provision of fitness suites is about right. |
| EA               | Spring Boroughs - Suitability informed by both Water Cycle Study and Level 2 Strategic Flood Risk Assessment and Sequential and exception tests as defined in PPS25.   |

# 11 Leisure and Recreation

| Sport<br>England | Green edge to river side to allow for quality walking, cycling and informal recreation, and wildlife corridor.  Direct link between town centre, Waterside and Beckets Park and Delapre Park and Lake. |
|------------------|--|
|                  | Opportunity to include significantly more Delapre Lake frontage within development area.   |
|                  | Lake has good potential to meet future sport and active recreation needs – and other leisure developments related to lake.   |
|                  | Sport can benefit evening economy and provide facilities to enhance the city   |
| 140150           | living, e.g. use of upper floors or retail premises.   |
| WNDC             | Support locations and note consistent with master planning work.   |
|                  | Waterside and Avon Nunn Mills sites – fully integral to expanded City and  |
|                  | therefore suitable for a full range of leisure and cultural facilities.  |
|                  | Area south of Southbridge – potential for facility of regional or national   |
|                  | importance marking the gateway.  |
| English          | Support  |
| Heritage         |  |
| HCA              | Strongly supported   |
| NEL              | Support linkages between Becket's Park and Midsummer Meadow.   |
|                  | High quality developments are essential for the area and supported.  |
| NEL              | Mix of B1, B1c or housing alongside leisure facilities – through wider master planning activities.   |
| EA               | Suitability informed by both Water Cycle Study and Level 2 Strategic Flood   |
|                  | Risk Assessment and Sequential and exception tests as defined in PPS25.  |
|                  | Note: drinking establishments are a higher vulnerability classification than   |
|                  | restaurants. Any developments in Flood Zone 3 need careful consideration   |
|                  | of the detail of the uses proposed. EA is highly likely to object in principle to  |
|                  | applications for highly vulnerable developments within Flood Zone 3.   |

# 12 Transport - General

| WNDC       | Stress the critical importance of transport proposals and the need for a robust transport strategy identifying how people will access the area - align with JCS. |
|------------|--|
|            | Any proposals need to be fully tested and modelled.  |
|            | Disused rail line – needs to be fully evidenced.   |
|            | Routes in and out of the centre for public transport will be required and locations for interchanges.  |
|            | Conformity with LTP / future spending priorities of NCC.   |
| NCC-Policy | Ensure bus use is provided after bus station demolished.   |
|            | Balance the need to reduce the inner ring road against that of providing effective road capacity.  |
| HCA        | Welcome public transport as opposed to car.  |
|            | Introduction of a Green Travel Plan would help promote alternatives.   |
| Sport      | Any new road proposals or improvements must not provide a barrier  |
| England    | between Delapre Park and Lake. Must be suitable bridges and tunnels, not   |
|            | just road crossings.   |
| HA         | Expect plan to be supported by an appropriate transport evidence base  |
|            | (current problems, preferred land use and transport proposals)   |
|            | CAAP needs to demonstrate how the transport measures necessary to  |

support growth will be delivered - who, how funded and developer contributions where appropriate.

Safeguard the Strategic Road Network.

Concerned about lack of emphasis placed on prioritising sustainable access to the town centre as opposed to car borne visitors.

CAAP doesn't fully recognise the importance of sustainable accessibility.

Disparity between emphasis on sustainable accessibility within the objectives and the actual approach the authority will undertake through the spatial development strategy of the Plan.

Disparity between view to accommodating the needs of those that wish to travel by car 'as long as it does not cause significant congestion' appears at odd with an earlier reference in the plan about Transport Strategy for Growth.

Car parking – assume plan will seek to prioritise the provision to meet the needs of short stay shoppers and visitors = increased turnover of spaces. This isn't apparent in document. Need to clarify position on provision and charging for long stay.

Welcome restriction of long stay spaces and seeking charging for them to be equal or above that of public transport.

#### 12.1 **Changing Character of Inner Ring Road**

| English<br>Heritage | Need a detailed design exercise to establish how modern traffic requirements can be accommodated with objective of re-establishing townscape coherence. Need assessment of character and full understanding of all modes of transport, including pedestrian movement. |
|---------------------|---|
| NEL                 | Priority to ease movement between key locations. NEL working with NCC on Unlocking Northampton's Growth Potential Project. Will consider transportation solutions to key developments – essential that as solutions emerge they are considered within the CAAP.       |
| Police              | Must consider emergency services access, particularly fire and rescue.  |
| HCA                 | Support. Improvements to natural surveillance and visibility for pedestrian, with more well lit accessible routes and better public realm would create additional life on the street.   |

#### **12.2 Pedestrian Movement**

| English  | Principles of shared space need to be look at further as a way of safely  |
|----------|---|
| Heritage | integrating traffic with walkers.   |
|          | Public transport through Beckets Park – loss of trees and larger junction |
|          | would affect setting of listed buildings and conservation area.           |
| Police   | Secured by design standards. Consider emergency vehicles in doing any     |
|          | pedestrianisation.  |
| EMRA     | Can't find any specific reference to making provision for and encouraging |
|          | cycling access.   |

#### 12.3 Castle Station

| Sport   | Better opportunity could be included to strengthen direct links from station |
|---------|--|
| England | to Victoria Park and the open spaces on both sides of Westbridge.            |
|         | High quality walking and cycling direct links to the disused railway line.   |

### 12.4 Abington Street

| English  | Support re-examination of pedestrianisation and look at shared space. |
|----------|---|
| Heritage |   |

### 12.5 Sheep Street

| English  | Welcome proposals to look at broken section and removal of subways.    |
|----------|--|
| Heritage | Need to look at linkages in this area especially if traffic re-routed. |
|          | Pedestrians need access to the Mounts.                                 |

### 12.6 Plough Junction

| English  | Welcome early discussions. |
|----------|----------------------------|
| Heritage |                            |

## 13 Climate Change

| WNDC     | Remove unless specific guidance relating to Central Area is provided – covered in Central Government and RSS8. |
|----------|--|
| English  | Support.   |
| Heritage | Opportunity to cover historic buildings but needs to reflect special   |
|          | character.   |
|          | English Heritage has produced a range of documents.  |
| GOEM     | Support policies relating to reducing green house gases and increasing   |
|          | sustainability in built environment in new and existing developments.  |
| Police   | Guidance document appropriate.   |
| HCA      | Use of more sustainable forms of energy is strongly supported – suggest a                                      |
|          | guidance document for developers.  |
|          | In relation to specific reference to CHP in 4.16 it should be the most   |
|          | appropriate technical solution should be sought at the time of development.                                    |
| EMRA     | Keen to promote a holistic approach to more sustainable development  |
| EA       | Include reference to reducing or adapting for flood risk in relation to climate                                |
|          | change.  |
|          | Support guidance document.   |
|          | Consider East Midlands Strategy (2002) key objectives with regards to  |
|          | promoting good environmental quality for development.  |
|          | Further consider flood risk in context of climate change and how the River                                     |
|          | Nene Corridor could be optimised through basing the plan on robust   |
|          | evidence base and a positive strategy.   |

#### 14 Flood Risk

| EA | Support inclusion of Flood Risk sections (Para 3.73-3.75)   |
|----|---|
| EA | Water Resources Act 1991 and Land Drainage Byelaws 1981 mean formal EA consent is required irrespective of T&C Planning Act approvals / permissions for any works or structures, in, under, over or within 9.0 metres of the top bank of the Slade Brook designated a 'main river'. |

# 15 Regents Square

| English  | Support |
|----------|---------|
| Heritage |         |

13

# 16 Abington Square

| English  | Not pedestrian friendly.   |
|----------|--|
| Heritage | Some buildings poor but 2 listed buildings in middle of the traffic. |
| Police   | Use of empty units by community groups.                              |
|          | Ongoing management and maintenance – street cleaning.                |

# 17 St John's / Angel Street / Bridge Street

| Police | Lack of active frontages.   |
|--------|---|
|        | Need to improve lighting.   |
|        | Evening economy is good but need to consider appropriate uses are |
|        | located together.   |
|        | Engagement with the Force is crucial.                             |

#### 18 Built and Natural Environment

| WNDC | Design Guidance – continue to support.  Gateways on Bedford Road and Bridge Street are relocated away from inner ring road to reflect future expansion. |
|------|---|
| GOEM | Emphasise good design though specific policy on how design will contribute to the successful implementation of the Plan.                                |

## 19 Heritage

| English  | Opportunity to set down clear strategy for management of historic            |
|----------|--|
| Heritage | environment. Proposals to extend boundaries of conservation areas,           |
|          | Conservation Management Plans, commitment to shop frontages / control        |
|          | advertising and Article 4. Measures to maintain / restore / reuse buildings. |
|          | Major interventions to junctions should benefit the historic environment.    |
|          |  |
|          |  |

# 20 Site Specific Policies and Masterplans

| WNDC     | Support approach and agree with developing detailed masterplans once CAAP adopted.                        |
|----------|---|
| English  | Support masterplans but not in isolation.   |
| Heritage |   |
| GOEM     | Masterplans don't need to go in LDS but should contain no matter that ought to be subject to examination. |
| Dalla    | ů ,   |
| Police   | Sensible.   |
|          | Clear policy on bin storage – presence of bins adds to sense of uncared for                               |
|          | and can lead to anti social behaviour.  |
| НА       | Need to embed opportunities to maximise sustainable travel in individual                                  |
|          | development sites.  |
| HCA      | Supported.  |
|          | Should be adopted by NBC. In prime sites the introduction of Design                                       |
|          | Codes.  |
|          | Difficult to generalise. Some instances Supplementary Planning  |
|          | Documents others will warrant Design Codes or Enquiry by Design.  |

### 21 Waterside

| I         | Defeire and efficient |
|-----------|-----------------------|
| English   | Retain gas offices.   |
| Linguisti | rictain gas offices.  |

| Heritage              | Gas holder adjacent to roundabout – imaginative gateway? Support leisure.  |
|-----------------------|--|
|                       | Includes registered battlefield - opportunities for interpretation.  |
| Police                | Needs active frontages – failing of much of recent developments in waterside.  |
|                       | Care in introducing an evening economy so that safety issues are addressed.  |
|                       | Lighting areas of park where use occurs is encouraged but where no use then no lighting.   |
| Sport<br>England      | Landmark building welcomed but recommended that also include sport in line with opportunities researched as background to the Waterside Masterplanning exercise.                                       |
|                       | Welcome improved pedestrian and cycle access along watercourses including the missing link around the southern most gas holder.  Also include entry and exit points for canoes and adventurous outdoor |
|                       | sport.   |
|                       | Para 4.21 The Waterside proposals and Becket's Park are supported in   |
|                       | principle as recreational and sports facilities in or close to town centres can provide additional attractions that can support the viability of centres.  |
| HCA                   | Welcomed but need sustainable transport solutions.   |
| Environment           |  |
| Agency                | Risk Assessment and Sequential and exception tests as defined in PPS25.  |
| Environment           | Support proposals to open up riverside area to appropriate land uses.  |
| Agency                | Welcome opportunity to identify areas where land could be opened up to   |
|                       | 'make space for water' and potentially reduce flood risk, as well as   |
| English and a second  | providing biodiversity and recreational benefits.  |
| Environment<br>Agency | Need clear commitment to assessment and strategy for compensation of lost habitat and intensification of human activities.   |
| / igonoy              | Piecemeal provision of green spaces / infrastructure should be avoided and should be planned for strategically.  |

### 22 Becket's Park

| Sport       | Canoe launching area needed to support and link to Whitewater Centre       |
|-------------|--|
| England     | downstream. Should be on north back of the river, immediately              |
|             | downstream of the wider, and directly accessible (including for minibuses  |
|             | and canoe trailers)  |
| Environment | Suitability informed by both Water Cycle Study and Level 2 Strategic Flood |
| Agency      | Risk Assessment and Sequential and exception tests as defined in PPS25.    |
| Environment | Welcome promotion of enhancements to rivers and canals for canoeing        |
| Agency      | and other recreational and improved access.                                |

### 23 Green Infrastructure

| WNDC | Needs more prominent role to build upon existing natural assets,         |
|------|--|
|      | particularly River Nene Corridor.  |
|      | Need to reference work of River Nene Regional Park.                      |
| NEL  | Linkages to Waterside welcomed. Further work in Midsummer Meadow –       |
|      | lighting provision, signage, interpretation and physical improvements to |
|      | security and visibility.   |
| NEL  | Extend links to Nene River Centre, the Lakes and Rushmere Road.          |
| HCA  | Sufficient linkages to green space.                                      |

| Sport   | Welcomed.   |
|---------|---|
| England | Once Becket's Park area is established then additional leisure including chandlery and water sports equipment retail at the Lake as well as limited waterside cafes / restaurants / pubs would strengthen area as destination. A cafe / restaurant would strengthen the site as a destination and activity along the river.  Opportunities to offer a return route on the south bank of the river should be considered. |

# 24 Regeneration Development Principles

| WNDC     | WNDC continue to provide specific guidance.                                    |
|----------|--|
| English  | Support approach to development sites.   |
| Heritage | Needs to be clearer idea of purpose of landmark buildings                      |
| Police   | May need to look again at phasing of Spring Boroughs – high priority.          |
|          | Would not want to see regeneration of Spring Boroughs completed until          |
|          | after the redevelopment of Castle Station as any delays in regeneration of     |
|          | the estate will lead to the station continuing to be divorced from the rest of |
|          | the town centre by an area of high deprivation.                                |
| EMRA     | Policy 2 of RSS and Policy 25 reference point in matters to take into          |
|          | account when considering design of new development proposals.                  |

#### 25 Grosvenor Centre

| English  | Opportunity to recreate streets.   |
|----------|--|
| Heritage | Support priorities for pedestrian connectivity.                            |
|          | Concerned Council seeking to agree floor space without knowing the design. |
|          | Not being involved in pre-app discussions.                                 |
| Police   | Must ensure transmission system under which all emergency services         |
|          | communicate is maintained within the expanded centre.                      |
|          | Support active frontages and removal of subways.                           |

## 26 Monitoring

| English  | Framework should establish measure of success of delivery plan with  |
|----------|--|
| Heritage | regard to historic environment, e.g. number of shop fronts improved. |

## 27 Delivery

| GOEM                               | More detail required on what, where, when, who, how will be needed, particularly in the first phase. |
|------------------------------------|--|
| Hardingston<br>e Parish<br>Council | Where is the money to pay for all the development? Will other areas suffer?                          |

## 28 Relationship to Saved Local Plan Policies

| GOEM | Where a DPD contains a policy which is intended to supersede another |
|------|--|
|      | policy, it must state that fact and identify the superseded policy.  |

# 29 Water Efficiency

| EA | Welcome references to Code for Sustainable Homes. | Minimum code level |
|----|---|--------------------|
|    | 3 or 4 mandatory.                                 |                    |

| Every  | opportunity | should    | be   | taken   | to  | build  | water   | efficiency | into | new |
|--------|-------------|-----------|------|---------|-----|--------|---------|------------|------|-----|
| develo | pments and  | innovativ | ve a | pproacl | hes | should | d be en | couraged.  |      |     |

## 30 Other matters

| Police       | No mention of management or maintenance once regenerated. Consider public toilets and their management. Encourage developers, architects and local planning authorities to install sprinklers. |
|--------------|--|
| HCA          | Page 54, Para 4.18 line 3 – should be 'it is' not 'are'.   |
| Hardingstone | Nothing has been mentioned about medical improvements or schools.  |
| Parish       | With increased population should come more doctors, dentist and another  |
| Council      | hospital. More schools will be needed.   |