

West Northamptonshire Joint Core Strategy

Pre-Submission Joint Core Strategy

February-March 2011

Officer Responses to Representations

for the

Joint Strategic Planning Committee

16 July 2012

Appendix 2



**West Northamptonshire
Joint Planning Unit**

1.0 - Foreword

1. Foreword

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Foreword	0	0	0	0	0	0	0	0	0

Summary of issues raised by Respondents

- No representations received

Joint Planning Unit Response to Representations

No response required.

Recommended Action

None

Section 1.0 – The Representation Arrangements

2. The Representation Arrangements

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
1.0 The Representation Arrangements	2	2	0	0	2	1	1	0	0

Summary of issues raised by Respondents

- Respondents' expressed concerns about the overall complexity of the public consultation exercise and the value placed on representations made.

Joint Planning Unit Response to Representations

The arrangements for representations are governed by Regulations and it is essential that the JCS meets the statutory requirements in this respect. Every effort was made to ensure that representations could be made easily for example by email and online. The extent of changes made between the Emergent and Pre-Submission versions of the JCS demonstrates that considerable value has been placed on the representations made.

Recommended Action

No changes required in response to representations.

3.0 - Introduction

4. Introduction

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
3.0 Introduction	98	97	1	4	94	86	7	1	0

Summary of issues raised by Respondents

What is the West Northamptonshire Joint Core Strategy?

- Respondents consider that no reference is made to the Minerals and Waste Development Framework.
- Respondents consider that more reference needs to be made to the Sustainable Community Strategy (SCS) for Daventry District. A brief summary of each districts' SCS should be included in the Joint Core Strategy.

Introduction

- Large majority of representations are standard responses and submit that the preparation of the JCS ought to be halted until the enactment of the Localism Bill.
- Respondents question the validity of the Core Strategy based on the prepared evidence base studies or seek to have the document reformatted to make it more user friendly.
- Respondents state that SUEs are not in the original JCS and therefore have not been properly consulted upon.

Joint Planning Unit Response to Representations

It is accepted that an appropriate reference should be made to the Minerals and Waste Development Framework as this forms part of the development plan for the West Northamptonshire Area

The Introduction refers directly to the Sustainable Communities Strategies that have been prepared for the area and indicates that the visions contained within them have set the agenda for the priorities within the JCS. The Daventry District SCS is listed in Appendix 1 as one of the 'other plans and strategies' that have informed the preparation of the JCS. Further references are not necessary and would add to the length of the JCS.

The preparation of the JCS beyond Pre-Submission has been delayed to enable consideration of the implications of the Localism Act and changes to national

planning policy and regulations. A number of amendments are required to the Introductory section which reflect the national changes to the planning system.

The preparation of the JCS has been informed by a robust and comprehensive evidence base. This has been further updated to inform the Proposed Changes and Submission of the JCS.

The format of the JCS seeks to strike a balance between being a document that is technically robust but also clear and easy to read.

The SUEs that have been identified within the PSJCS are either a refinement of the preferred locations for growth identified in the Emergent Joint Core Strategy or are extant Local Plan allocations which are being carried forward. These locations have therefore been subject to previous consultation. The Pre-Submission document itself has provided the opportunity for further comments to be submitted.

Recommended Action

That Section 3.0 Introduction be amended as set out in the following Proposed Changes:

- PC001/I
- PC002/I
- PC003/I
- PC004/I
- PC005/I

4.0 - Spatial Portrait, Vision and Objectives

5. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	7	7	0	5	2	0	1	1	0

Summary of issues raised by Respondents

- A respondent supports the JCS overall approach particularly the protection of rural areas.
- The respondent considers strategic planning should be undertaken at District Council level with cooperation between authorities.
- The respondent considers a policy on rights of way should be included.

Joint Planning Unit Response to Representations

Support for the JCS overall approach is welcomed.

The Joint Strategic Planning Committee comprises elected Councillors from Daventry District Council, Northampton Borough Council, South Northamptonshire Council and Northamptonshire County Council, and is charged by statute to prepare a Joint Local Development Scheme.

As regards a rights of way policy this is a detailed matter that lies within plan-making dealing with development management issues and not the overarching strategy document that is the Joint Core Strategy.

Recommended Action

No further changes required.

4.0 - Spatial Portrait, Vision and Objectives

6. Spatial Portrait

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Spatial Portrait	30	30	0	11	19	10	8	1	0

Summary of issues raised by Respondents

The Spatial Context

- The respondents consider that insufficient consideration has been given to the development of Northampton in relation to strategic planning of North Northampton area, Milton Keynes and neighbouring Counties.
- The respondent is concerned that the section does not describe the character, qualities and local distinctiveness of settlements or landscape in the plan area.

The West Northamptonshire Area

- The respondent supports the focus for learning in the area and suggests that reference is made to growth in jobs from the higher education sector.
- A respondent feels that paragraph 4.11 does not sufficiently mention the significance of a growing elderly population and further statistical information needs to be provided in the JCS. Respondent further considers the SHMA is inadequate and there is an insufficient evidence base on older persons housing needs over the plan period.
- The respondent considers that paragraph 4.13 contains technical errors in relation to named companies for example, Avon has left Northampton.
- The respondent considers that paragraph 4.14 should be interpreted that Daventry town should include contingencies for development thereby learning the lessons of the past where growth that was anticipated did not take place.

Jobs

- Respondents consider that the JCS does not have a strategy for accommodating jobs growth in the event in an upturn in the economy and a quick response needs to be accommodated by headroom in the allocation of employment land. In addition the respondents consider that high level of demand for B8 is not recognised or accommodated within the employment strategy;
- Respondents consider more information is required on jobs provision for Daventry town and the plan lacks clarity. Housing growth at Daventry may be unsound without supporting jobs growth.

Homes

- The respondent comments that paragraph 4.23 refers to 'specific neighbourhoods in Northampton and Daventry being in need of housing improvement', however it is not clear if this is the same as the four deprived neighbourhoods referred to in the Regenerating and Developing Communities section and suggests this needs clarification in the plan. The respondent comments that housing improvement implies physical regeneration whereas community regeneration suggests developing the capacity and skills of the local residents as such the respondent considers clarity is needed in the plan on what is being proposed.
- A respondent considers that paragraph 4.25 does not sufficiently address rural housing and under occupation particularly in respect of older persons housing. The respondent further considers there is no supporting evidence base on this aspect and the plan is unsound in respect of rural housing provision and elderly persons housing needs.

Movement

- The respondent considers that paragraph 4.27 should refer to Daventry Town and not the District to ensure the town has a sustainable 'homes to jobs' balance. In addition the respondent considers that the wording implies 52% of Daventry District's residents commute to Northampton whereas there are many other destinations for out commuting and the plan should be clearer in what is meant.
- The respondent considers that the figures in paragraph 4.28 are estimates and are not accurate. The respondent comments that low public transport usage is a reflection of the lack of facilities.

Community Regeneration

- The respondent considers there is a lack of clarity on what is meant by 'Regeneration' and questions whether this is the physical regeneration of the housing fabric, developing social capital of the local community, or holistic neighbourhood regeneration. The respondent considers the plan needs to be clearer on what the intent of the proposal is.
- The respondent considers that paragraph 4.31 rightly refers to the pockets of deprivation in rural areas, however the respondent considers this should be picked up again in the Regenerating and Developing Communities section (which deals entirely with urban areas) and also more fully in the Rural Areas section (i.e. the last bullet point in paragraph 16.5) and this omission needs to be addressed in the plan.

Town Centres

- The respondent considers that the paragraph 4.35 should include the words "and out of town retail and leisure destinations" after the words "...Rugby and Banbury" as they believe both are important both practically and in terms of policy perspective.

Sport and Leisure

No Representations Received

Future Opportunities

No Representations Received

Climate Change

- The respondent considers that as paragraph 4.44 introduces the reader to SUEs for the first time a definition of an SUE within the text would be useful.
- Respondents support the wording of the paragraph.

Infrastructure and Development

- Respondents support the wording of the paragraph that requires the provision of necessary infrastructure to be provided in a timely manner. However, a respondent objects to this wording and considers infrastructure is required to come first.

Connections

- A respondent considered paragraph 4.48 should give a description of how Dallington Grange and Whitehills development will access the town given congestion on the A5199 and A508 and the Bants Lane/ Cock Hotel junction. Respondent considers provision of new bus lanes is not practicable given the layout and general condition of these roads.
- The respondent considers the plan should make specific reference to rural transport problems and how the lack of public transport compounds social and economic deprivation in villages.

Protecting and Building Communities

No Representations Received

Supporting Town Centres

No Representations Received

The Economy

No Representations Received

Educational Attainment

- A respondent gives support to reference to the growth of the student population, but feel it is a little underplayed. Respondent considers reference to the anticipated high growth in student numbers should be further expanded upon within paragraphs 4.55 and 4.56.

Housing

No Representations Received

Green Infrastructure

- The respondent considers that the term 'Green Infrastructure' is planning jargon and should be explained in the text. The respondent also considers that the JCS currently separates out open space (as covered in paragraphs 7.34 to 7.43) from other forms of green infrastructure (as covered in paragraphs 10.8 to 10.12), whereas the glossary suggests that open space is part of green infrastructure. The respondent considers that this is inconsistent and needs to be resolved in the text.

Design

- The respondent considers the JCS is inconsistent in its aims in that whilst the historic character and cultural heritage are stressed in 4.59 and 4.60 as important planning considerations, its proposed planning policies will result in Boughton Village undoubtedly suffering from increased traffic as a result of SUE development which the respondent believes will substantially damage the village.

Joint Planning Unit Response to Representations

The Spatial Context

The Spatial Context of West Northamptonshire considers the wider area in which it is located in relation to strategic planning of North Northampton area, Milton Keynes and neighbouring Counties. Evidence base studies that support the development of policies within the plan also include this wider view where appropriate, for example the identification of retail catchments.

The distinctiveness of settlements and landscape in the plan area are briefly referred to in the West Northamptonshire section of the Spatial Portrait and in more detail in Sections 10, 12, 13, 14, 15 and 16 of the JCS which are the Built and Natural Environment, the four towns and the Rural Areas sections.

The West Northamptonshire Area

Support for the focus for learning in the area is welcomed. Reference is made to jobs growth in Paragraphs 4.55 and 4.56 of the Pre-Submission JCS and further reference is made in the Economic Advantage section of the JCS.

The SHMA does include an analysis of the needs of older people and notes that the proportion of people aged 60 years and above is expected to grow significantly. The policies in the Housing section of the JCS reflect the findings of the SHMA and include provision for specialist housing e.g. extra care and design standards such as Lifetime Homes to cater for the needs of older people.

There are no technical errors in Paragraph 4.13 of the Pre-Submission JCS Carlsberg, Avon Products, Barclaycard, Nationwide Building Society and Panasonic are all represented in Northampton.

The JCS includes careful consideration of delivery of development at Daventry. Should housing delivery not occur as anticipated the Joint Strategic Planning Committee will review and take appropriate action.

Jobs

Triggers are included to take account of an economic upturn with a review trigger in the event that more jobs are being created than expected. There is significant land provision made for B8 needs within the plan period.

Jobs will be provided in Daventry as set out in Policy S8, through office and leisure development in Daventry Central area, regeneration of existing employment sites and the supply pipeline. The supply pipeline for Daventry is shown in the West Northamptonshire Employment Land Study showing there is employment land available to support the scale of housing proposed at Daventry.

Homes

The statement in Paragraph 4.23 of the Pre-Submission JCS is a general statement and does not need to be specific. The specifics are detailed as parts of the relevant policies within the JCS. Housing improvement is explained further in the places chapter and is related to the needs of the specific area identified.

Paragraph 4.25 of the Pre-Submission JCS provides a summary of the issues and cannot cover all aspects. The SHMA has considered the needs of older people and also includes information about housing issues in rural areas, but was not able to assess housing need below the district level. The Housing and Rural sections of the JCS include a range of policies to ensure that housing needs are met including specific policies for housing in rural areas, and specialist housing for older people. The specific issue of under occupation is not something that can be directly addressed by land use planning policy.

Movement

The information in the Spatial Portrait gives an overview of the area. It is appropriate that Daventry as a sub-regional town caters for its hinterland not just for the town itself. It is not considered that the wording implies 52% of the district's population commute to Northampton.

The figures at paragraph 4.28 of JCS which refer private car usage in Daventry District are estimates. There are a number of reasons why public transport usage is low in parts of the Daventry area.

Community Regeneration

Regeneration is further considered in the Regenerating and Developing Communities section of the Pre-Submission JCS where a fuller description of regeneration is given.

The Settlements and Countryside Local Plans to be prepared by Daventry District and South Northamptonshire Councils will cover regeneration and developing communities in the rural areas. The Regenerating and Developing Communities section of the Pre-Submission JCS provides the relevant higher level policy framework.

Town Centres

Paragraph 4.35 of the Pre-Submission JCS makes reference to town centre environments.

Sport and Leisure

No Representations Received

Future Opportunities

No Representations Received

Climate Change

Sustainable Urban Extensions (SUEs) are large scale developments as referred to in the text. Although this is the first time SUE is referred to it is unlikely that the JCS will always be read chronologically. A definition of SUEs is also proposed to be included in the Glossary.

Infrastructure and Development

It is appropriate and necessary for infrastructure to be phased alongside the delivery of development.

Connections

Paragraph 4.48 of the Pre-Submission JCS includes a general requirement for the plan to address traffic congestion in new developments. The Places policies contain further detail on required highway improvements and public transport requirements for individual SUEs, whilst the Connections section of the Pre-Submission JCS covers strategic highway improvements and sustainable transport modes.

The Connections and Rural Areas sections of the Pre-Submission JCS make reference to rural transport issues. The Settlements and Countryside Local Plans to be prepared by Daventry District and South Northamptonshire Councils will provide further detailed consideration of rural transport issues within the framework provided by policies in the JCS.

Protecting and Building Communities

No Representations Received

Supporting Town Centres

No Representations Received

The Economy

No Representations Received

Educational Attainment

Reference is made to the growth of the student population in paragraphs 4.55 and 4.56 of the Pre-Submission JCS and further reference is made in the Economic Advantage section of the JCS.

Housing

No Representations Received

Green Infrastructure

The term Green Infrastructure is explained in Section 10 and the Glossary of the JCS.

Design

The JCS must balance the protection and conservation of West Northamptonshire's cultural heritage both in its built form and its landscape context with the need to provide for homes and jobs to meets its needs.

Recommended Action

No change recommended to the Spatial Portrait in relation to issues raised by respondents but that the Spatial Portrait text is amended to incorporate factual updates as set out in the following Proposed Changes:

PC001/S

PC002/S

PC003/S

PC004/S

PC005/S

4.0 - Spatial Portrait, Vision and Objectives

7. Spatial Vision

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Spatial Vision	16	15	1	9	7	2	4	1	0

Summary of issues raised by Respondents

- Respondents support the vision.
- Respondents support the vision but consider that the policies will not deliver the vision, in particular by the reduction of housing growth from RSS requirement. Respondents consider the allocation of sites in sustainable villages should be used to make up the shortfall of housing numbers against the RSS requirement including expansion of Silverstone village.
- Respondents consider reference needs to be made to the economic down turn within the vision.
- The respondent considers that the JCS does not explore the public safety issues available to it, for example, there is no mention of 'safety & security' within the vision.
- A respondent considers the overall vision should include a reference to sport/community needs, and a policy should be included which protects open spaces and facilities.
- The respondent considers villages should offer a range of housing, not just affordable housing, as stated in the vision.
- Respondents consider the vision needs to address rural housing needs. Respondents consider evidence base studies on rural housing are absent. The respondent believes there is insufficient older persons housing in Daventry District and feels that the lack of an up to date and effective planning policy for Daventry has hindered the provision of housing, such that the district now has an acute under-supply of housing land.
- The respondent considers that Northampton has a legacy of vast areas of existing inferior 20th century offices and retail parks and as the strategy does not propose bulldozing this, the vision cannot be realised. The respondent considers there should be a definition of what an "outstanding" public realm or a 'vital village' is. The respondent considers that without these definitions the phrases are meaningless and add nothing to the vision and cannot be measured on their accuracy or truthfulness.
- The respondent considers it is not clear from the vision whether Daventry is considered to have already achieved a sub regional status or whether it is to grow into this role. The respondent considers the vision and objectives are not ambitious enough for Daventry's growth and the Core Strategy is not effective as a result. The respondent believes there is no clear vision on how Daventry is to grow and what the final objective is. The respondent considers the vision should

be redrafted to explain more fully that development needs to take place to secure the objectives for the town.

- A respondent considers that the vision lacks aspiration to reduce the economic deficit and infrastructure deficit, enhance Northampton Town Centre, create employment opportunities, enhance healthcare provision, and generally improve the wellbeing of the West Northamptonshire population. Respondent believes that if the JCS was adopted it would add to the deficits and not in any way reduce them, as in its present format it is undeliverable.

Joint Planning Unit Response to Representations

Support for the vision is welcomed.

It is considered that the housing figures provided by the RSS are not deliverable within the timeframe of the plan. The Government has indicated that it will revoke RSSs which will allow local authorities to determine their own housing needs and through a duty to cooperate with other authorities consider how this can be accommodated.

Reference is made in the Spatial Portrait to the current economic circumstances however the vision encompasses the period to 2026 and beyond within which it is anticipated there will be a number of economic cycles. The policies of the Economic Advantage section together with the Places sections set out the aspiration for West Northamptonshire to play its part in reducing the economic deficit, enhance the town centres of the plan area and create employment opportunities. The JCS is supported by an Infrastructure Delivery Plan which considers the extent and cost of infrastructure required and various funding sources.

The vision presents an image of the future in a broad sense. It refers to a good quality of life for future residents within which safety and security, sport/ community needs, open space and other facilities all feature.

It is considered that the vision can be realised over time. There are opportunities for redevelopment or for existing development to be remodelled in the future. The SEMLEP Northampton Waterside Enterprise Zone is an example of redevelopment through regeneration.

The vision for West Northamptonshire as a whole is to provide for high quality housing for all, however, for the rural areas there is an emphasis on providing housing that is affordable to local people.

The Strategic Housing Market Assessment has considered the needs of older people and also includes information about housing issues in rural areas, but was not able to assess housing need below the district level. The Housing and Rural Areas sections of the JCS include a range of policies to ensure that housing needs are met including specific policies for housing in rural areas, and specialist housing for older people. The specific issue of under occupation is not something that can be directly addressed by land use planning policy.

The vision is clear that Daventry fulfils a Sub- Regional Role. The vision and policies provide for the growth of Daventry within this role. The Daventry section of the Pre-Submission JCS identifies the growth of Daventry aligned to its necessary infrastructure delivery.

Recommended Action

No change to the spatial vision recommended in relation to the issues raised by respondents.

4.0 - Spatial Portrait, Vision and Objectives

8. Spatial Objectives

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Spatial Objectives	17	14	3	10	7	1	3	3	0

Summary of issues raised by Respondents

- Respondents support the objectives.
- The respondent supports the promotion of sustainable development in order to meet the growth needs of the area and in particular supports the recognition in the JCS of the need for growth and development to support Brackley and assist in the creation of a self-sufficient sustainable town.
- The respondent considers it would be helpful if the JCS clarified that this list of 15 numbered objectives is not in any order of priority or weighting in planning decisions.
- A respondent considers that whilst there is reference to 'heritage' in Objective 15 the contribution that the historic environment makes to the plan should be recognised as being wider than just design. Respondent feels that in view of the amount of change proposed in the plan there should be a specific objective relating to the protection and enhancement of the natural and historic environment, against which the other policies can be assessed.
- A respondent considers that the protection and enhancement of the historic environment merits greater inclusion in the objectives as a strategic issue within the context of major development that the JCS addresses. In this regard the respondent refers to the relationship between development at Silverstone and the protection of the significant heritage assets at Stowe.
- The respondent considered an additional objective to direct retail to appropriate locations should be included.

Objective 1 - Climate Change

No Representations Received.

Objective 2 - Infrastructure and Development

No Representations Received.

Objective 3 - Connections

No Representations Received.

Objective 4 - Protecting and Building Urban Communities

No Representations Received.

Objective 5 - Supporting Northampton Town Centre

- The respondent supports the Town Centre focus as set out in the JCS.

Objective 6 - Supporting Daventry Town Centre

No Representations Received.

Objective 7 - Supporting Towcester and Brackley Town Centre

No Representations Received.

Objective 8 - Economic Advantage

- The respondent supports the objective but believes it cannot be delivered by the JCS polices as the job target has been lowered and in the respondents view the JCS has adopted a strategy of economic restraint.

Objective 9 - Specialist Business Development

- The respondent supports the objective but believes it cannot be delivered by the JCS polices as the job target has been lowered and in the respondents view the JCS has adopted a strategy of economic restraint.

Objective 10 - Educational Attainment

- The respondent supports the objective.

Objective 11 - Housing

- The respondent suggests the wording of this objective should be altered to 'appropriate development in the rural areas'.
- The respondent considers a reduced rural housing target will not meet the needs of local residents. The respondent believes less additional housing in rural areas will have a detrimental impact on the delivery of affordable housing and will provide less support to facilities and services in villages.

Objective 12 - Protecting and Supporting Rural Communities

No Representations Received.

Objective 13 - Rural Diversification and Employment

No Representations Received.

Objective 14 - Green Infrastructure

No Representations Received.

Objective 15 - High Quality Design

- The respondent considers that the JCS does not maximise opportunities to explore the public safety issues available to it. The respondent considers there is no mention of 'safety and security' in any of the objectives.

Joint Planning Unit Response to Representations

Support for the objectives is welcomed.

Support for the promotion of sustainable development is welcomed.

Support for the growth proposed at Brackley is welcomed.

The list of objectives is not intended to be in any order of priority or weighting in planning decisions.

The JPU accepts that whilst there is reference to 'heritage' in Objective 15 the contribution the historic environment makes to the plan should be recognised as being wider than just design. The Proposed Changes include a new Objective 16 to conserve and where possible enhance heritage assets.

Objectives 5, 6 and 7 support the regeneration of town centres. The relevant policy provisions in the Spatial Strategy and places chapters direct new retail floorspace to appropriate locations.

Objective 1 - Climate Change

No Representations Received

Objective 2 - Infrastructure and Development

No Representations Received

Objective 3 - Connections

No Representations Received

Objective 4 - Protecting and Building Urban Communities

No Representations Received

Objective 5 - Supporting Northampton Town centre

Support for the Town Centre focus as set out in the JCS is welcomed.

Objective 6 - Supporting Daventry Town Centre

No Representations Received

Objective 7 - Supporting Towcester and Brackley Town Centre

No Representations Received

Objective 8 - Economic Advantage

Support for the objectives is welcomed. The JPU has looked closely at the number of new jobs required to ensure a good balance of homes and jobs. If we have too many job opportunities in-commuting will be high, putting pressure on transport infrastructure into our urban areas, if there are too few jobs out-commuting will drain the local economy and new investment. The Proposed Changes make provision for a minimum of 19,000 new jobs increasing the number of jobs by 3,000 from the figure stated in the Pre-Submission JCS version. This increase seeks to ensure a range of jobs are provided and to acknowledge that although Northamptonshire has remained reasonably resilient to the recent economic downturn, some jobs have been lost.

Objective 9 - Specialist Business Development

As above.

Objective 10 - Educational Attainment

Support for this objective is welcomed.

Objective 11 - Housing

The Strategic Housing Market Assessment includes information about housing issues in rural areas, but was not able to assess housing need below the district level. The Housing and Rural Areas sections of the JCS include a range of policies to ensure that housing needs are met including specific policies for housing in rural areas, and specialist housing for older people. The specific issue of under occupation is not something that can be directly addressed by land use planning policy.

The reference to a reduced rural housing target is unclear. The overall reduction in housing provision stems principally from reductions in the scale of development that is likely to be delivered from Sustainable Urban Extensions adjoining the principal urban areas, rather than any reduction in rural housing provision. The Housing and Rural Areas sections contain a range of positive policies to support development in rural areas to meet local needs including affordable housing and the provision of services and facilities.

Objective 12 - Protecting and Supporting Rural Communities

No Representations Received.

Objective 13 - Rural Diversification and Employment

No Representations Received.

Objective 14 - Green Infrastructure

No Representations Received.

Objective 15 - High Quality Design

Objective 15 refers to providing a safe, healthy and attractive place for residents, visitors and businesses. The issue of safety is therefore covered.

Recommended Action

That the objectives be amended and a new objective 16 included, as set out in the following Proposed Changes:

PC006/S

PC007/S

PC008/S

PC009/S

PC010/S

5.0 - Spatial Strategy

9. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	43	37	6	14	29	11	10	6	2

Summary of issues raised by Respondents

Introduction

- A number of respondents express support the overall strategy set out within the JCS.
- Other respondents have made representations against the introduction which express objections to the overall strategy on the following grounds:
 - What they consider to be a fundamental and significant departure from the earlier Emergent JCS has not been justified by robust evidence and has not been subject to effective community involvement. As a result it is argued that the Pre-submission JCS should be withdrawn and reconsidered;
 - That the strategy fails to address the economic and infrastructure deficit and misses significant opportunities to develop brown field sites, and
 - That the development of the JCS has not taken into account key considerations relating to demographic, physical, geographical and technological factors and the importance of personal choice. As such the strategy and its approach to issues such as transport and retail provision are unsound.
- One respondent makes specific comments regarding the impact which they consider the strategy will have on the strategic road network, specifically:
 - A45 through Northampton;
 - A45 Daventry – Northampton including the A45/ A5 junction; and
 - A43

The Key Diagram

No Representations received.

Hierarchy of Places

- One respondent expresses need for the recognition of the role of villages in providing services and facilities.
- One respondent is unclear whether Daventry is already considered to be a sub-regional centre. In the respondent's view this status has not yet been achieved

so the hierarchy in the JCS should seek to 'develop Daventry into a sub-regional town'.

- One respondent considers that the JCS only defines a partial hierarchy which renders it incomplete and unsound.
- One respondent considers that reference could be made to the need for Northampton as the 'Principal Urban Area' to extend beyond the existing borough boundary.

Development in the Towns and Adjoining the Towns

- A respondent considers that the recognition that piecemeal development is more difficult to provide and plan for in terms of the provision of utilities infrastructure, is helpful.

Making the Best Use of Previously-Developed Land and the Vacant and Under-Used Buildings

- Respondents support the objective of re-using previously developed land, but want the essential role of greenfield land in delivering the growth agenda to be acknowledged.
- One respondent considers that reference could be made to the Northamptonshire Brownfield Land Action Plan.

Development in the Rural Areas

- Respondents consider that:
 - The need for development in the rural area should not be qualified by the word 'limited';
 - JCS does not provide a hierarchy and as such the statement in Paragraph 5.14 is incorrect;
 - There are no clear spatial rural choices in the plan.

Joint Planning Unit Response to Representations

Support for the overall strategy is welcomed.

The Pre-Submission JCS is supported by a robust, up-to-date and credible evidence base. There have been changes in National Governance between the publication of the Emergent JCS and Pre-Submission JCS and the new government seeks to revoke Regional Spatial Strategies (RSS). The justification for the revised 50,150 housing requirement is fully set out in the Housing technical paper which was published alongside the Pre-Submission JCS. The JCS has been subject of effective community involvement. The Pre-Submission consultation is the third time that the document has been consulted upon. This is in line with national planning policy and the statements of community involvement that have been prepared by the partner authorities.

Impacts on the strategic road network and their mitigation are assessed in the transport evidence base including the Northampton Growth Management Scheme (NGMS) as explained in the JCS.

The JCS does take into account the economic and infrastructure deficit. The housing targets have been lowered in light of the economic situation and the Infrastructure Delivery Plan (IDP) has been updated accordingly to take account of the current economic situation. In regards to brownfield land development, the amount of development in West Northamptonshire over the plan period means that greenfield sites will be developed due to a lack of brownfield land available. However, the SUE's maximise the use of previously developed land and vacant and under-used buildings within West Northamptonshire's urban areas, whilst also enabling managed greenfield land releases where they meet the Plan's objectives. Policy S1 also sets out that 'In assessing the suitability of sites for development priority will be given to making best use of previously developed land and vacant and under-used buildings in urban or other sustainable locations'.

The development has taken into account demographic and physical factors when developing the document. These figures have been updated and accordingly elements of the JCS have been changed, such as housing figures and retail capacity for example. The IDP has also been updated taking into account demographic changes.

Highway improvements are needed to the A45 corridor between Daventry and Junction 16 of the M1 to enable the expansion of Daventry to be completed. Improvements to the existing A45/A5 Weedon junction will form a key proposal for the early stages of development, and the M1 junction 16 to Daventry A45 Link Road, known as the Daventry Development Link, will provide the opportunity to enable development in the longer term.

The Sandy Lane Relief Road and Northampton North West Bypass between them will complete an orbital route around the western side of Northampton, giving access to the A45, A43, M1 and to SUEs to the north-west and west of the town.

The role of villages is recognised in the rural areas section and specifically Policy R1 'Spatial Strategy for the Rural Areas'. The Village Services and Facilities Technical Paper also provides an analysis of the services and facilities that each individual village offers.

It is considered that the role of Daventry as a sub-regional centre is made clear within the JCS, including the scale and type of development and when, where and how it will be delivered.

The hierarchy is not 'partial'. It examines the four main towns in the West Northamptonshire area before looking at the remaining rural areas.

The Northampton 'Principal Urban Area' is the Northampton Related Development Area, which includes land in Daventry and the South Northamptonshire Districts.

Support for the overall approach to development in West Northamptonshire is welcomed.

Support for the objective of re-using previously developed land is supported. The role of greenfield land in the SUE development is discussed in paragraph 5.11 of the Pre-Submission JCS, which sets out that SUE's will 'maximise the use of previously developed land and vacant and under-used buildings within West Northamptonshire's urban areas, whilst also enabling managed greenfield land releases where they meet the Plan's objectives'.

The Northamptonshire Brownfield Land Action Plan was a document that was started but was not adopted. Therefore reference to this document cannot be made if it was not completed.

It would be unsustainable to allow development on a large scale in rural areas. Policy R1 sets out a rural hierarchy and the scale of development that would be allowed within each level of the hierarchy.

Housing requirements for the rural areas are clearly defined in Policy S3 of the JCS, and whilst the Rural Chapter does not define a specific hierarchy, Policy R1 provides a clear framework for the definition of the hierarchy in the Local Plans that are being prepared for Daventry District and South Northamptonshire. This will enable a range of needs to be met in rural areas, including housing. A clear programme has been established for the preparation of the relevant Local Plans through the Local Development Scheme, and development will continue to occur in the rural areas in accordance with saved Local Plan policies and interim policy arrangements.

This framework approach will allow a more sophisticated and fine-grained approach to be taken forward in the relevant Local Plans. This approach is very much in line with the localism agenda which is a key part of government policy.

The framework approach described above will provide scope for different spatial choices to be considered through the preparation of settlements and countryside local plans.

Recommended Action

That the Introductory text be amended as set out in Proposed Changes:

PC001/SS

PC002/SS

5.0 - Spatial Strategy

10. Policy S1 – The Distribution of Development

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S1 – The Distribution of Development	91	85	6	16	75	56	14	4	1

Summary of issues raised by Respondents

- Respondents express concern about the potential coalescence arising from the expansion of Northampton. A local policy is proposed to specify minimum distances between existing settlements and any urban extension. It is suggested that this would strengthen Policy S1 Part D.
- Representations focus principally on two key issues i.e. the policy's approach to the rural areas and the use of previously developed land (PDL or brownfield land)
- In respect of the rural areas respondents seek greater recognition for the role of smaller settlements, beyond the rural service centres, and the contribution they can make towards delivering growth targets. The following additional criteria are proposed for inclusion in part D of the policy:
 - The need to achieve a sustainable balance between jobs and homes;
 - Development which supports the retention and or provision of services in rural areas; and
 - To provide a wider range of housing and other development opportunities in the rural area.
- The criteria referring to the 'quality of tranquillity' is difficult to interpret and the reliance on the CPRE's 'Tranquillity Map' is questioned.
- In respect of PDL respondents are seeking either a reduction in or removal of the 30% PDL target for the following reasons:
 - Lack of evidence to justify the target;
 - Concern that the target overestimates the amount PDL as the target predates the changes to the definition of PDL in PPS3;
 - Concern that the target will be used to restrict the delivery of development; and
 - The differences between the three local authority areas are such that targets should be specified for each area.
- Conversely other representations are seeking to place greater emphasis on the use of PDL and consider that the capacity of the urban areas has been underestimated. A consistent view expressed in these responses is the principle of using PDL before any development is permitted on greenfield land.
- Respondents support the policy but are concerned that restrictive policies elsewhere in the JCS will frustrate delivery of development.

- Respondents express concern regarding the status of Daventry as a ‘sub-regional centre’. One representation questions the ability of the town to meet this role and whether the market can sustain the growth required. Another is seeking a clear statement that the level of development in Daventry will be commensurate with the objective that the town becomes a sub regional centre.

Joint Planning Unit Response to Representations

The expansion of Northampton is controlled by the Northampton Related Development Area (NRDA) which is defined in Policy S4 of the JCS and on the Proposals Map. The boundary of the NRDA is drawn so that it avoids potential coalescence with the surrounding villages and the individual SUE proposals include provisions for structural greenspace, which will mitigate the impact of development on the landscape and neighbouring settlements. The countryside beyond the NRDA boundary is protected by national policy and other saved policies in Local Plans. A specific local policy to specify minimum distances of separation between settlements is not necessary or justified by evidence.

Policy S1 sets out a clear spatial strategy to focus development within the existing towns. This strategy has been clearly established through the plan preparation process and is supported by the Sustainability Appraisal. Within this context the use of the term ‘limited’ to describe development in the rural areas is appropriate. The JCS does however adopt a positive approach to enable development in the rural area that is consistent with the objective of meeting local needs and supporting local services. This approach is reflected in Policy S1 part D) and in the policies within the Housing and Rural Chapters of the JCS which support the provision of housing, jobs, services and facilities to meet the needs of the rural areas.

It is accepted that the first bullet point of part D could be amended to refer to enhancing as well as maintaining the distinctive character and vitality of rural communities. Some further clarification of the term ‘tranquility’ would also be helpful and could be included within the supporting text.

Encouraging the use of previously developed land (PDL) remains a key principle within national planning policy. It is appropriate therefore that the JCS should include a local policy which supports this principle. The 30% target within the policy has been derived from a robust analysis of past development and an assessment of future land supply. Further information on how the target was calculated will be set out in a technical paper. A 30% target is considered to be relatively modest and deliverable. There is no evidence to suggest that the target will in any way limit the delivery of development in West Northamptonshire. Conversely the scale of development which the JCS seeks to deliver is such that greenfield sites and PDL sites will need to come forward at the same time. It will not be possible or appropriate to insist that PDL sites should be developed in advance of greenfield sites as some representations suggest.

The JCS seeks to strike a balance between enabling development to be delivered and ensuring that development is of the highest quality possible. It is recognised that there will be cases where certain requirements within the JCS, such as affordable housing and certain design standards will be subject to viability assessment on a site

by site basis. Every effort has been made to ensure that the development allocated in the JCS and the associated infrastructure is deliverable within the plan period.

It is considered that the role of Daventry as a sub-regional centre is made clear within the JCS, including the scale and type of development and when, where and how it will be delivered.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC003/SS

PC004/SS

5.0 - Spatial Strategy

11. Policy S2 – The Hierarchy of Centres

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S2 – Hierarchy of Centres	19	19	0	9	10	3	4	3	0

Summary of issues raised by Respondents

- Representations largely from major retailers request that the plan should be flexible to deal with changing circumstances as PPS4 requires. Local centres should be reconsidered and reference to local centres in SUEs should be deleted. There is a request for Sixfields and Mereway to be identified in the hierarchy of centres as district centres and for district centre provision for Duston/ Upton area to be included.
- Respondents support the overall policy approach but seek greater emphasis on limiting out of town retailing.

Joint Planning Unit Response to Representations

Planning Policy Statement 4 is now replaced by the National Planning Policy Framework (NPPF). The Proposed Changes introduce some flexibility for retail policies to deal with changing circumstances.

The West Northamptonshire Retail Study Update 2011 and retail capacity refresh 2012 advises that new retail development should be located to serve the Sustainable Urban Extensions.

Sixfields is not identified as a centre but falls within a description as a retail and leisure park similar to that at Riverside Retail Park. Mereway is dominated by a large Tesco Extra store and a very limited number of smaller stores giving 7 units in total. As such it does not offer a broad diversity of retail uses expected of a District Centre. Although the Tesco store has a strong trade draw from a wide catchment it operates as a stand-alone store rather than as an anchor to a centre as for example the Waitrose store does at Kingsthorpe District Centre. Activity is strongly focused around the Tesco store with limited activity or obvious connectivity away from it to any surrounding uses, largely due to the extensive car parking area, as such the area around the store lacks any sense of place.

A local centre is proposed for Northampton Upton Park SUE and Northampton King Heath SUE which will provide local facilities for the residents in those Urban Extensions and for residents in the wider local area.

NPPF requires a sequential approach to the location of retail development with first preference for town centre location. The policy approach including Proposed

Changes seeks to limit comparison retailing outside town centres to an appropriate local scale. Policy S9, Distribution of Retail Development, imposes an impact assessment for retail proposals over 1000sqm gross for development outside centres in an up-to-date Local Plan.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PS005/SS

PS006/SS

PS007/SS

PS008/SS

PS009/SS

PS010/SS

5.0 - Spatial Strategy

12. Policy S3 – Scale and Distribution of Housing Development

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S3 – Scale & Distribution of Housing Development	92	53	39	11	81	32	26	23	0

Summary of issues raised by Respondents

The Amount of Housing Required

- Respondents are challenging the overall housing requirement on the following grounds:
 - Does not conform with the RSS;
 - Will not provide for housing needs;
 - Housing requirements should be based on sound evidence rather than being reduced on the basis of an economic slowdown. The downturn in building rates is, in part, due to an outdated planning policy base and a lack of local authority commitment to address the problem; and
 - Concern that the requirement is still too high having regard to the demise of the RSS, uncertainty regarding population, and the ability to provide supporting infrastructure.
- Respondents consider that the JCS fails to plan for 15 years housing supply from adoption and is therefore in conflict with PPS3. Given the level of growth and infrastructure provision the plan period should be extended to 2031.

Policy S3: Scale and Distribution of Housing Development

- This policy has attracted a number of substantial representations, principally from the development industry, many of which are lengthy and technical in nature. The main focus of these representations is the reduction of the housing requirement to 50,150 dwellings from 2001 – 2026. For ease of reference the key issues raised in these representations are summarised under the following headings:
 - Legal Compliance;
 - Justification for the Policy;
 - Effectiveness of the Policy; and
 - Consistency with national policy

Legal Compliance

It is argued that the JCS is not legally compliant on the grounds that it fails to have regard to national policy and does not conform generally with the Regional Spatial Strategy (RSS) i.e. the East Midlands Regional Plan. Much reference is made to the Cala Homes case and its consideration by the courts and the conclusion that the RSS remains part of the development plan.

Justification for the Policy

Respondents criticise the robustness of the evidence base and the lack of justification for a reduction in the housing requirement. The key arguments are summarised below:

- The reduction in the housing requirement is not based on robust evidence;
- Concern that evidence was produced after the decision to reduce the housing requirement had been taken in October 2010;
- The Strategic Housing Market Assessment (SHMA) is inadequate and does not provide an independent assessment of need. The SHMA update has been revised to 'fit' the target, whereas it should be informing the target;
- There is no evidence that the needs and demands for housing are less than those identified through the RSS;
- The decline in housing provision is not a reflection of a lack of need or demand for housing in the area;
- The assumptions made regarding building rates are challenged as being unfounded and overly pessimistic. It is argued that there is considerable potential for growth, but the JCS has not considered growth options above 50,000 dwellings;
- It is argued that low building rates have not been caused simply by the recession, but also by the delays in the preparation of a strategic planning framework for the area, which has restricted land supply and housing provision even in strong market conditions;
- The demographic forecasting is criticised e.g. the assumptions about migration and the failure to use 2008 based projections which show an increase of 10,000 in the number of households to be accommodated in the area;
- ONS projections would justify a higher provision than the RSS;
- The RSS is based on robust and credible evidence, tested through consultation and examination. No compelling evidence has been provided which justifies departing from its provisions;
- It is unclear whether the scale and distribution of development has been informed by the analysis of the capacity of individual settlements;
- There is no justification for the split in provision between the urban and rural areas. A number of representations claim that the provision in the rural areas is too low especially in Daventry District;
- There is potential to increase the level of development in rural areas and therefore increase the overall target; and
- A range of alternative dwellings targets are proposed from reinstating the RSS target of 62,125 up to 72,000.

Effectiveness of the Policy

Respondents focus on the implications of the policy and the reduction in the housing requirement as follows:

- Insufficient homes will be provided for the population;
- The impact on adjoining areas has not been considered;
- Constraining supply will exacerbate problems regarding access to decent housing and the affordability of housing;
- The negative impact on the economy, e.g. the reduced housing target has led to a reduction in the targets for jobs;
- The needs and demands for housing will not be met;
- The provision in rural areas is too low to meet the needs of the villages;
- When provision within the NRDA is taken out the requirement for Daventry District is 40% lower than the RSS; and
- The housing requirement for Daventry District is not deliverable or flexible. There should either be no split between the urban and rural area, or if the split remains the rural requirement should be higher.

The need for greater flexibility is raised, particularly the need for contingencies, should one or more of the SUEs not be delivered, as anticipated by the JCS. It should be clearly stated that the figures are 'minima'.

Consistency with national policy

Respondents claim that the policy is not consistent with national policy, particularly PPS3 and PPS12 for the following reasons:

- Housing provision is not based on an assessment of the need and demand for housing as required by PPS3;
- The failure to plan for growth is inconsistent with the national objective to increase housing supply and promote sustainable development. It is argued that the JCS should adopt a long term, flexible approach and plan for improvements in the economic position; and
- The JCS will not make provision for housing for 15 years following adoption. The plan period should therefore be extended beyond 2026.

Whilst the majority of representations have come from the development industry, there have also been representations from local residents and community groups raising the following issues:

- Concern that there was no consultation on revised figures;
- Concern that the number of houses is still too high;
- Concern that the delivery of even the reduced requirement will be challenging in the light of the need to fund and deliver infrastructure; and
- A specific request for a reduction in the supply figure for South Northamptonshire to enable a reduction in the scale of growth planned at Towcester.

Joint Planning Unit Response to Representations

The response to representations follows the headings that have been used in the summary of issues raised by respondents above:

The Amount of Housing Required

The justification for the revised 50,150 housing requirement is fully set out in the Housing technical paper which was published alongside the Pre-submission JCS. The housing target is predicated on an assessment of the level of growth that is deliverable, having regard to the impact of the economic recession, but also ensures that 'local needs' arising from natural increase are met. The target also includes an element of growth above the level of development required against natural change in the existing population.

It is accepted that that the target is challenging, but a lower target would run the risk of failing to meet local needs, and represent a missed opportunity in terms of the positive benefits that housing growth would bring to West Northamptonshire.

It is accepted that the JCS will not make provision for housing for 15 years from the date of adoption, indeed it is expected that there will be at least 12 years left of the plan period at the time of adoption. This accords with the NPPF requirement to identify a supply of specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. Whilst there is a preference in national policy for the time horizon to be at least 15 years, this is no longer an absolute requirement. Having regard to the uncertainty in respect of the economic recession and the subsequent recovery, it is considered that longer term development beyond 2026 is best considered through a subsequent review of the JCS.

Policy S3: Scale and Distribution of Housing Development

Legal Compliance

Policy S3 has been developed having regard to national policy as it applied at the time e.g. PPS 3. Specifically the development of the housing target has had regard to current and future demographic trends, the accommodation requirements of specific groups and the evidence provided in the Strategic Housing Market Assessment (SHMA). The National Planning Policy Framework (NPPF) expects Plans to meet objectively assessed needs for housing, but also expects plans to be realistic and deliverable. It is considered that the housing target in Policy S3 is realistic and deliverable and also meets the needs that arise from the natural increase in the existing population together with an element of growth.

It is accepted that the East Midlands Regional Plan (RSS) remains part of the development plan and as such the requirement for 'general conformity' currently applies. The housing target in Policy S3 is less than that specified in the RSS, but it is clear that the RSS target is undeliverable. The government intend to revoke the RSS and have put in place the legal mechanisms to secure revocation.

Justification for the Policy

As indicated above, the justification for the revised 50,150 housing requirement is fully set out in the Housing technical paper which was published alongside the Pre-submission JCS. The revised target is based on a realistic assessment of what is deliverable having regard to the economic recession and prospects for recovery, together with issues such as infrastructure delivery. It is not accepted that this target is overly pessimistic. Conversely it remains a positive and challenging target that will meet the needs arising from natural change and provide for some additional growth. The annual completion rate which is required from 2010 to 2026 is approximately 400 dwellings per annum higher than the rate that was actually achieved between 2001 and 2010.

The criticism that the planning system has restricted land supply is not borne out by the evidence. For example as at 1 April 2010 sites for over 13,000 dwellings have permission or approval in principle. Whilst the need and demand for housing clearly exists the market is not currently able to provide for this. The alternative dwelling targets which have been suggested of between 62,125 and 72,000 are simply unrealistic and undeliverable.

The evidence base underpinning the policy will be updated using the 2008 based population projections, and this work will be set out in a further technical paper.

The scale and distribution of development in Policy S3 reflects the spatial strategy which is set out in Policy S1. For each of the local planning authority areas development is focussed principally on the existing towns, with the most significant amount of development being directed to Northampton as the 'Principal Urban Area'. The precise scale of development within each of the settlements reflects the capacity of the SUEs and the ability to bring forward the necessary infrastructure to support the development, alongside other issues such as urban capacity and environmental constraints.

The scale of provision in the rural areas reflects the urban focus of the spatial strategy, but still includes provision for around 6,000 dwellings during the plan period. Further increases in the provision for the rural areas would undermine the spatial strategy and lead to unsustainable patterns of development.

The Joint Planning Unit is satisfied that the scale of development identified for Daventry is appropriate and can be delivered during the plan period. There is no need to identify additional development in the rural area on this basis.

Effectiveness of the Policy

Although the housing target is lower than the RSS it is still sufficient to accommodate the number of households arising from natural change, and also includes some provision for growth. The scale of development also provides significant scope to provide for affordable housing to meet the needs that have been identified in the SHMA. It is accepted that the proportion of affordable housing required in order to

meet housing needs is higher, but this is still deliverable having regard to the viability assessment that has been undertaken.

It is acknowledged that the jobs growth figure has been reduced, but it is important to ensure that there is a broad balance between the provision of homes and jobs. The jobs figure still provides significant scope for economic development in the area and is also expressed as a minimum.

The policy also provides significant scope for housing development within the rural areas and together with the positive policies in the Housing and Rural sections will enable local needs for housing development to be met in a sustainable manner.

Extensive work has been undertaken to ensure that the SUEs identified in the JCS will be deliverable in the plan period. On this basis the need for contingencies is reduced. Changes are proposed to Policy S6 that set out the monitoring arrangements for the JCS including housing, and the steps that will be taken if the housing trajectory is not being met. Information regarding the contingencies will be set out in Appendix 6 – the Monitoring Framework.

Consistency with National Policy

PPS3 and PPS12 have now been replaced by the National Planning Policy Framework (NPPF). The NPPF expects Plans to meet objectively assessed needs for housing, but also expects plans to be realistic and deliverable. It is considered that the housing target in Policy S3 is realistic and deliverable and also meets the needs that arise from the natural increase in the existing population together with an element of growth. On this basis the approach is consistent with national policy.

As regards concerns that the scale of growth is still too high, it is accepted that the level of development will still be challenging, but the JPU is satisfied that the development and the requisite infrastructure, as identified in the Infrastructure Delivery Plan, can be delivered in the plan period. The scale of growth proposed at Towcester during the plan period has been reduced to reflect the realities of delivering development and infrastructure in the current economic circumstances.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC011/SS
PC012/SS
PC013/SS
PC014/SS
PC015/SS
PC016/SS
PC017/SS
PC018/SS

5.0 - Spatial Strategy

13. Policy S4 – Northampton Related Development Area

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S4 – Northampton Related Development Area	159	150	9	3	156	74	75	7	0

Summary of issues raised by Respondents

- 120 of responses to the NRDA policy were received in the form of a standard representation from local residents seeking the following:
 - Restriction of the expansion of the Pineham employment area;
 - Assurance that the Junction 16 Warehouse Park will not be resurrected; and
 - A new policy to protect the countryside gap between Northampton and Kislingbury.
- The key issues raised in other representations include:
 - Concerns regarding the impact of development in the NRDA on the surrounding rural area, particularly the potential for coalescence, the lack of infrastructure, and traffic impact. The need for a specific policy to reduce the risk of coalescence with villages is raised;
 - The housing requirement within the NRDA should be increased to the level specified in the RSS for the Northampton Implementation Area;
 - The housing requirement should be expressed as minima;
 - The NRDA should not be defined on an OS base as this is too prescriptive and inflexible.
 - There are no contingencies within the policy to enable additional land to be brought forward should any of the SUEs be delayed;
 - Land to the east of Wootton previously identified as the Wootton Strategic Development Area (SDA) proposal should be included in the NRDA.
 - Greater flexibility is needed to enable the development of smaller sites on the edge of Northampton to meet higher growth target. Flexibility should also be provided to enable development beyond the boundary if the yield from urban sites is lower than expected;
 - The selection of SUEs within the NRDA has not been justified. A technical paper should be produced to explain how options have been evaluated.

Joint Planning Unit Response to Representations

A new strategic site at Junction 16 (Midway Park) and the expansion of Pineham employment area is not required to meet needs while likely to compete with more

sustainable employment land including derelict land in the Enterprise Zone on the edge of Northampton town centre.

The planning application that has been submitted by the Homes and Communities Agency in respect of Northampton South of Brackmills Sustainable Urban Extension (SUE) will ensure that the physical and visual separation of the urban edge and neighbouring villages is preserved.

The expansion of Northampton is controlled by the Northampton Related Development Area (NRDA) which is defined in Policy S4 of the JCS and on the Proposals Map. The boundary of the NRDA is drawn so that it avoids potential coalescence with the surrounding villages and the individual SUE proposals include provisions for structural greenspace, which will mitigate the impact of development on the landscape and neighbouring settlements. The countryside beyond the NRDA boundary is protected by national policy and other saved policies in Local Plans. A specific local policy to specify minimum distances of separation between settlements is not necessary or justified by evidence.

The housing development in the NRDA has been developed having regard to national policy as it applied at the time e.g. PPS 3. Specifically the development of the housing target has had regard to current and future demographic trends, the accommodation requirements of specific groups and the evidence provided in the Strategic Housing Market Assessment. The National Planning Policy Framework (NPPF) expects plans to meet objectively assessed needs for housing, but also expects plans to be realistic and deliverable. It is considered that the housing target in the NRDA is realistic and deliverable and also meets the needs that arise from the natural increase in the existing population together with an element of growth.

It is accepted that the East Midlands Regional Plan (RSS) remains part of the development plan and as such the requirement for 'general conformity' currently applies. The housing target is less than that specified in the RSS, but it is clear that the RSS target is undeliverable. The government intend to revoke the RSS and have put in place the legal mechanisms to secure revocation.

The housing targets for the NRDA should not be expressed as minima as the NRDA figure has been determined to be the most deliverable given the current economic climate. It would also be very difficult to monitor whether the NRDA housing target is being met if it is expressed as a minimum rather than a precise target.

The NRDA boundary is not intended to be flexible. It is a precise boundary which shows the whole of the administrative boundary of Northampton and those neighbouring parts of Daventry District and South Northamptonshire Councils' administrative areas where development 'related to the growth of Northampton' has already been completed or has planning permission or an approval in principle and those parts of Daventry District and South Northamptonshire Council's administrative areas that are allocated as Sustainable Urban Extensions (SUEs).

The SUEs do not restrict development coming forward on other sites. The policy outlines that development will be concentrated primarily in and adjoining the principal

urban area of Northampton for example, therefore other sites will be considered within the principal urban area of Northampton.

The Wootton Strategic Development Area (SDA) formed part of the Northampton South East proposal. The wider Northampton South East option has not been taken forward as an SUE in the Pre-Submission JCS, principally due to the significant delivery risks associated with the large scale development and the infrastructure required to support it, especially the highway infrastructure.

The development of smaller sites around the edge of Northampton is not encouraged in the Joint Core Strategy as this is an Option (Option A) that was rejected in the Emergent Joint Core Strategy. This is because spreading the development around the edges of the urban areas would increase the load to the current road and utilities infrastructure, without bringing forward the economies of scale that would make the provision of further infrastructure cost effective and therefore deliverable.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC019/SS

5.0 - Spatial Strategy

14. Policy S5 – Sustainable Urban Extensions

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S5 – Sustainable Urban Extensions	43	31	12	8	35	15	13	7	0

Summary of issues raised by Respondents

This policy lists the SUEs which are allocated in the JCS. Respondents are seeking changes which fall into the following categories:

- Representations seeking the deletion of one or more of the SUES;
- Representations seeking the inclusion of additional/ alternative SUEs; and
- Representations seeking amendments to the existing SUEs specified in the policy.

The deletion of the following SUEs is sought:

- Northampton West;
- Northampton South; and
- Brackley North (excluding the 'Sawmills' element of the site)

The inclusion of the following additional or alternative SUEs is sought:

- Land south of the M1 – known as 'Northampton Highgate';
- Daventry South SUE – 2200 dwellings by 2026 and 3300 dwellings in total;
- Land east of Wootton should be identified as a 'direction of growth' to provide greater flexibility;
- Northampton South East – should be partly allocated with the balance of the growth area identified as a 'broad location for growth'; and
- M1 Junction 16 (Midway Park) – is a suitable employment site that should be included in the policy for B2 and B1 strategic employment.

The following amendments are sought to the existing SUEs listed in the policy:

- Daventry North East - the policy should reflect the total allocation of 4000 dwellings to avoid arbitrary phasing;
- Northampton West – additional land should be included to increase the capacity from 1500 dwellings to 5400;
- Towcester South – should not be limited to 1500 dwellings and 1500 jobs. The policy should specify development up to the full allocation and refer to a site area for employment land rather than job numbers;
- Brackley East – should be developed in advance of Brackley North;

- Northampton South of Brackmills – two separate extensions to the SUE are sought;
- Northampton Kings Heath – the dwelling yield should be ‘up to a maximum’ in the range of 2950-3000; and
- Northampton North – should be extended to incorporate provision from the Northampton West and South SUEs which should be deleted.

Other key issues raised by respondents:

- There is no evidence that the SUEs listed for Northampton can accommodate the housing targets set out in Policy S3;
 - Policy should reflect the committed site at Monksmoor Farm, Daventry;
 - Site specific allocation of SUEs in the JCS is inappropriate as the evidence base is insufficient, the allocations lack detail, and there are unresolved issues relating to viability and delivery. It is also argued that the SUEs, taken individually, are not fundamental to the delivery of the JCS and as such do not meet the requirements for strategic allocations specified in national policy.
 - There is no evidence that the employment provision specified in the SUEs will come forward: and
 - The reference to ‘local employment opportunities’ in each of the SUEs is unclear and does not specify the level at which it should be provided.
- One respondent considers that the policy should specify that some of the SUEs, such as Northampton – North of Whitehills, are allocated in existing ‘saved’ plans.

Joint Planning Unit Response to Representations

The respondent has recommended the deletion of one or more of the Sustainable Urban Extensions (SUEs). These include the Northampton West, Northampton South and Brackley North SUE. These options have been the subject of Sustainability Assessment as part of the plan-making process. The SUEs proposed perform well against other alternatives including extensions to other SUEs and is a sequentially preferable site for development and to provide for the required housing growth.

The area of land to the South of the M1 (known as Northampton Highgate) was rejected at the Emergent Joint Core Strategy stage. The reasons for rejection are set out in this document. The main reasons the option was rejected as the site is located beyond the strong physical barrier of the M1 motorway, which would conflict with the desire to provide good linkages between existing and new communities. In addition, this option would in effect, be akin to a new settlement requiring a wide range of its own facilities as it would be challenging for a new community to make maximum use of services and facilities within Northampton.

The Daventry South option was also rejected at the Emergent Joint Core Strategy stage. The reasons for rejection are set out in this document. The main reasons the option was rejected are because the site is disconnected from the urban area and town centre because of main roads would make it difficult to successfully integrate any residential development into the existing community. There is also a large

County Wildlife Site and an area of Ancient Woodland, limiting the potential development area.

In regards to the area of land to the east of Wootton, the current site of the South of Brackmills SUE is well contained by the existing urban area, woodland, roads and other clearly defined physical boundaries. The further development suggested in the representations would extend development into the open countryside and impact upon land which is of medium to high landscape sensitivity. It should be recognised that the traffic from the SUE will add stress to an already congested road network, including the Queen Eleanor interchange on the A45 and junction 15 of the M1. Further development would clearly add to congestion on the network.

The wider Northampton South East option has not been taken forward as an SUE in the Pre-Submission JCS, principally due to the significant delivery risks associated with the large scale development and the infrastructure required to support it, especially the highway infrastructure.

A new strategic site at Junction 16 (Midway Park) is not required to meet needs while likely to compete with more sustainable employment land including derelict land in the SEMLEP Northampton Waterside Enterprise Zone on the edge of Northampton town centre.

The JPU together with the developer has reassessed the rate of delivery of housing development in relation to the Daventry East SUE and agree that given the economic circumstances currently prevailing and the remaining number of years to implement the plan to 2026 a realistic delivery of housing from the site would be in the region of 2000 dwellings. However, should economic circumstances alter more quickly than anticipated then more housing could potentially be delivered. Hence a degree of flexibility is required in the policy wording to account for this.

An increase from 1,500 dwellings to 5,400 dwellings at the Northampton West SUE would lead to a disproportionate and unstable development in this location. Also given the recent economic circumstances currently prevailing and the remaining number of years to implement the plan to 2026 it would be unrealistic to deliver 5,400 homes over the plan period.

As part of the proposed changes, the 1,500 dwellings at Towcester South SUE are now expressed as a minimum figure to enable additional dwelling completions to take place during the plan period. Employment provision is now expressed as a site area and delivery expressed as a minimum figure.

It is recognised that significant progress is now being made at Brackley North SUE in respect of the proposed housing development to the south of Turweston Road such that the anticipated phasing of the site can be brought forward. This has been reflected in the supporting text. However, there is no justification that the Brackley North SUE should be brought forward ahead of the Brackley East SUE in terms of delivery.

The Northampton South of Brackmills SUE formed part of the Northampton South East preferred location for growth which was identified in the Emergent JCS. The

reasons for the rejection of the Northampton South East SUE have been explained earlier. The Northampton South of Brackmills SUE provides the opportunity for a smaller mixed use urban extension which adjoins the existing urban area and can be developed without the need for major infrastructure. The site is owned by the Homes and Communities Agency and has been included within their national accelerated delivery programme. There is therefore a high degree of certainty that the site will be delivered within the plan period.

The housing allocation at Northampton Kings Heath SUE policy has been reduced from 3,500 to 'In the region of 3,000'. The extent of development in the deliverable densities across the site and in recognition of archaeological and ecological constraints on the site has led to the reassessment of the overall housing quantum. A realistic figure of in the region of 3,000 houses is considered appropriate for the site.

The enlargement of the Northampton North SUE back to its Emergent JCS scale at over 5,000 dwellings is not considered the most sustainable option for Northampton set against the reduced quantum of housing growth now proposed to be delivered within the plan period as set out in the Pre-Submission JCS. A development of over 5,000 dwellings at Northampton North SUE would focus a significant proportion of development requirements in one location. To deliver a development of this scale within the plan period would require significant infrastructure and multiple housing starts in a local area for which marketability might then be depressed. The deliverability of such a scheme in the present economic climate is at best uncertain.

The SUE's listed for Northampton will not be expected to accommodate all of the development proposed in Policy S3. Whilst the SUE's will accommodate most of the development proposed in Policy S3, Policy S1 (The Distribution of Development) sets out that 'Development will be concentrated primarily in and adjoining the principal urban area of Northampton'. This includes other areas of land apart from the SUE's.

The Monksmoor development at Daventry is now at an advanced stage with developers on board and discussions regarding S106 legal agreement and reserved matters applications. Early delivery is anticipated. The development is included within the housing trajectory and in the increasingly unlikely event that the consent should lapse its previous consent and inclusion as a commitment within the JCS are material considerations. It is not considered that an additional policy for the Monksmoor development is necessary.

The evidence base documents have been kept up to date and have examined in detail the housing market and employment provision for example. The Infrastructure Delivery Plan has also examined the delivery and viability of each SUE and associated infrastructure project. This has been updated in line with the changes to the Pre-Submission JCS and the more recent Proposed Changes to the Joint Core Strategy. The SUE's are a fundamental component to the delivery of the SUE targets. As set out in the Emergent Joint Core Strategy, Sustainable Urban Extensions are the preferred option as the scale of the SUE's will make it easier to bring forward major infrastructure improvements and deliver the range of facilities

required to support the population and the job creation associated with large scale development.

The West Northamptonshire Employment Land Study and the Northamptonshire Strategic Employment Land Assessment have provided the evidence that the employment located within each SUE will come forward.

It will be up to the relevant local authority and developer as to whether the employment opportunities proposed are of a suitable 'local' scale.

It is not the responsibility of the Joint Core Strategy to specify the history of the allocated SUEs, such as the Northampton North of Whitehills SUE for example.

Recommended Action

That the policy be amended as set out in Proposed Changes:

PC020/SS

5.0 - Spatial Strategy

15. Policy S6 – Phasing of Housing Development

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S6 – Phasing of Housing Development	25	10	15	4	21	8	7	6	0

Summary of issues raised by Respondents

- Representations from the development industry claim that the policy provides unreasonable constraints on the rate of development as follows:
 - It is argued that if infrastructure is provided then there should be no phasing limitations. Therefore achievement of completions above the phased targets should be allowed;
 - The approach pushes back development beyond 2016 which fails to address the ongoing need for housing across the area. Additional growth could be achieved by bringing forward the delivery of Northampton North; and
 - The policy should provide a set of criteria to enable greenfield sites to be brought forward based on para 69 of PPS3.
- Respondents consider that the absence of a SHLAA assessment makes the phasing policy meaningless and unsound.
- Respondents argue that statements in the supporting text regarding the completion of infrastructure and provision of local employment should be included within the policy. Growth targets explicitly linked to local employment growth and infrastructure targets would provide a stronger policy statement.
- Respondents claim that the projections seem to ignore the findings of the Daventry appeals and the constraint that applies to further development until a Flore-Weedon bypass is provided. SUEs in Daventry will not be able to deliver significant housing before 2017 at the earliest.
- One respondent considers that trajectories should be provided for each local authority area and include the split between housing provided within the NRDA and that which meets the local requirement.
- Respondents consider consequential changes may be needed arising from representations on Policy S5, in respect of Northampton – Kings Heath SUE and Towcester South SUE.

Joint Planning Unit Response to Representations

It is accepted that the policy as drafted is too prescriptive regarding the phasing development, particularly in the light of current economic circumstances. However an indication of expected phasing is important as an aid to monitoring housing delivery. A change is proposed to the policy to clarify that figures for each phase are

‘expected’ rather than ‘required’ and that their purpose is to aid monitoring. This change should provide greater flexibility as sought by respondents.

The expected phasing reflects an assessment of the anticipated rates of development and the delivery of infrastructure. As regards Northampton North SUE, the trajectory anticipates first completion on the site in 2014/15. There is no convincing evidence to suggest that this could be brought forward earlier.

PPS 3 has now been replaced by the National Planning Policy Framework (NPPF). The phasing policy does not place any restrictions on greenfield sites coming forward.

The Strategic Housing Land Availability Assessment (SHLAA) assessment has been completed and published and is available to inform the Proposed Changes and Submission JCS.

Substantial changes are proposed to Policy S6 to specify the critical areas of plan delivery which will be monitored, and the mechanism for progress reporting. This includes the monitoring of infrastructure delivery and employment development as referred to by respondents.

The anticipated phasing takes account of the infrastructure that is required to support the delivery of development at Daventry. Changes are proposed to the housing trajectory for the Daventry North East SUE to reflect the anticipated delivery of the Daventry Development Link by 2021.

The inclusion of individual trajectories for each district and for the NRDA is not necessary within the policy. Changes are proposed however to include this technical information within Appendix 3.

Any changes to the housing delivery in individual SUEs such as Northampton Kings Heath and Towcester South will be reflected in Policy S6.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC021/SS

PC022/SS

5.0 - Spatial Strategy

16. Policy S7 – Provision of Jobs

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S7 – Provision of Jobs	19	16	3	9	10	4	4	2	0

Summary of issues raised by Respondents

- Respondents express concern that the jobs figure is so far removed from the RSS figure as to be out of general conformity.
- Respondents request a significantly higher jobs figure to stimulate/achieve investment. They consider the lower figure will not achieve the vision or objectives for West Northamptonshire and new sites are required to respond to the demand for B8.(e.g. Brackmills Point) and demand for strategic office development that cannot be accommodated in the Northampton central area.
- Respondents advise that it should be made clearer in the JCS that the skills and job targets are minima and that additional employment beyond this figure will be welcomed provided the local impacts, with mitigation, are acceptable and that the workforce will gain access by sustainable means. They also feel that it would be helpful to reference the 16,000 figure against the current level of jobs in West Northamptonshire i.e. the JCS could state what the base figure at 2010 is and/ or say what the percentage increase is if there are 16,000 additional jobs.
- The respondents consider that the JCS policies do not adequately reflect the economic potential of the area as a key driver for growth and economic prosperity. The respondents believe the JCS appears as a restriction on jobs. The respondents also believe that the disparity between 50,150 homes and 16,000 jobs needs to be clarified within the plan and the evidence base. The respondents point to the Strategic Employment Land Assessment which provides an indicative forecast of a requirement for 68,119 jobs for the 2001-2026 period based on a TEMPRO trend based model of employment growth rate building on the strong growth rates of previous years.
- Respondents support the reduced jobs target as this may help to stimulate growth in Wellingborough and reduce out commuting and that housing growth must be linked to local jobs growth.
- Respondents consider that the jobs contribution made by the expansion of the Higher and Further Education sectors should be better recognised in the plan.

Joint Planning Unit Response to Representations

The RSS jobs figure is a reference value for monitoring purposes rather than a target. It is intended to allow local areas to develop their own approach to sustainable jobs provision while taking account of regeneration in North

Northamptonshire. Policy S7 develops the approach with a minimum reference value for jobs provision to reflect the future available labour force, the impact of recession, and ensure enough jobs available for households moving into new housing. The JCS aims to build on the high levels of self-containment in the area especially in Northampton where 80% of people both live and work. The reference value avoids long distance commuting into the area and over allocation of employment sites that would prevent more centrally located sites coming forward. A significantly higher jobs value would not sustainably stimulate investment leading to unsustainable long distance commuting. However the JPU is mindful of the need to build in contingencies into the approach including stronger jobs growth than expected. The reference value approach now incorporates a stronger plan monitor process with clear review triggers for stronger or weaker jobs growth.

The National Planning Policy Framework (NPPF) requires a town centre first approach for office development with the focus within/on the edge of West Northamptonshire's town centres. Allocating additional out of centre greenfield land for town centre employment uses such as offices will divert investment from town centre/edge of centre employment sites and key initiatives such as the SEMLEP Northampton Waterside Enterprise Zone. Such additional out of centre greenfield allocations would not meet the objectives of the plan for sustainable growth. The Northampton Central Area plays an important role in providing jobs with potential to provide jobs growth in a sustainable location. The SEMLEP Northampton Waterside Enterprise Zone will help to bring forward key economic development in this central location.

The disparity between the SELA and JCS employment levels are due to:

- SELA including Non B-jobs unlike the RSS or JCS projections; and
- SELA (and RSS) based on pre-recession levels of growth as opposed to the available labour force or the effects of recession on growth.

Policy S7 is based on a jobs growth minima with a commitment to make up for jobs lost in the recession. Unexpected employment growth significantly beyond the minima will trigger a review of the plan. The JCS aims to create a step-change in the location and quality of jobs growth reversing recent trends of town-centre decline that if not managed will undermine the economic offer of West Northamptonshire.

The JPU agree the JCS jobs provision will help to stimulate growth in Wellingborough reducing out commuting to Northampton and that housing growth be linked to jobs growth. The jobs contribution made by the expansion of the Higher and Further Education sectors is further recognised in the JCS.

Brackmills Point has now been granted planning permission and incorporated into the employment land supply as an unconstrained site.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC023/SS

PC024/SS

PC025/SS
PC026/SS
PC027/SS
PC028/SS
PC029/SS
PC030/SS
PC031/SS

5.0 - Spatial Strategy

17. Policy S8 – Distribution of Jobs

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S8 – Distribution of Jobs	35	27	8	7	28	12	10	5	1

Summary of issues raised by Respondents

- Representations to the policy from the development industry comment that the sites identified in the plan are not sufficient or attractive to the market to deliver jobs growth. Furthermore they consider that the plan does not embrace the value of the warehouse and distribution sector to the local and regional economy and the renewal of sites will not meet the needs of the warehouse and distributions sector. Consequential changes to the policy are sought as follows :-
 - Reference to a strategic employment site at Houghton Gate and a new policy inserted referring to the delivery of this development;
 - Flexibility to deliver sustainable rail- related freight other than DIRFT 3;
 - Allocation of Brackmills Point for warehouse development;
 - Delete reference to Policy E1 as this does not refer to regeneration or renewal;
 - Rural employment should be referred to in Daventry section; and
 - Include an additional bullet point for Silverstone Circuit to state ‘and further employment, tourism, education and leisure development’.
- Respondents are seeking clarification on the following:
 - What is meant by ‘local’ employment?
 - Additional text required to refer to office and retail employment provision in Towcester as set out in Policy T2; and
 - What is meant by town centre, central area and principal urban area?
- Respondents offer support for the deletion of the employment area at Junction 16 and to the inclusion of additional safeguards in Policy E3 to prevent diversion of investment from the central area
- Respondents express concern that the plan assumes policy will emerge from Daventry Master Plan which is still under public consultation.

Jobs Growth by Sector

- The responses largely replicate those submitted against policies above relating to:
 - The need for reference to a Strategic Employment Site on land north of the A428 Bedford Road and east of The Lakes (Houghton Gate); and
 - Greater reference to be made to the importance of the Higher and Further Education sectors in the growth of the non Class B jobs sector.
- General comments raised by respondents refer to the loss of retail jobs due to internet shopping and the need for superfast broadband and a JCS policy to address this.

Joint Planning Unit Response to Representations

The West Northamptonshire Employment Land Study 2010 and its 2012 update provide an assessment of the scale of need for employment land and quality of land available to meet needs. The Study shows that a sufficient scale and quality of employment land is available to meet job requirements over the plan period including the provision of unconstrained available land in the short-term and beyond. At the same time the approach ensures town centre and edge of centre sites are brought forward adding to the offer of the town centre. Land is available in town centres, SEMLEP Northampton Waterside Enterprise Zone, DIRFT 2, Silverstone Circuit, Swan Valley, Brackmills Point, and existing employment areas such as Lodge Farm and Brackmills provide an adequate supply to meet a variety of needs. These sources include readily available green-field sites in locations attractive to the market such as Swan Valley, DIRFT, and Silverstone. The JPU have with the co-operation with the LEPs set out the contribution of the SEMLEP Northampton Waterside Enterprise Zone to the employment land supply and how it will help bring forward key centrally located sites. The Technology Realm framework has been moved to the Enterprise Zone to assist the delivery of the framework and comply with National Planning Policy Framework (NPPF).

The role of the warehouse and distribution sector has been considered in the WNELS Study and Update. Needs for B8 are met with substantial supply while keeping a balance of provision to provide a step change in the quality of jobs provided. The JPU is mindful of the needs of B8 in the area adding a reference to supporting text for Policy E1 and a key diagram inset to explain Policy E4.

The proposal at Houghton Gate is not necessary to meet JCS jobs provision, would be contrary to NPPF, while investigations reveal significant environmental and highway constraints at this location. Policy S8 and its supporting text has been amended to show the strategic contribution SEMLEP Northampton Waterside Enterprise Zone will make to manufacturing, research, and office uses on centrally located sites.

The JPU consider the employment locations at DIRFT, Silverstone, Swan Valley, Brackmills Point, and existing employment areas such as Lodge Farm and Brackmills provide an adequate supply to meet freight demands. The offer of Lodge

Farm to logistics will further improve once the Sandy Lane Relief Road and North West Bypass are in place.

In response to general comments already not covered in the response above:

- Planning permission for significant warehouse development was granted on a previously used site in 2012 at Brackmills Point;
- The reference to Policy E1 should be retained as the supply of employment land will include existing employment areas;
- The description of employment sector covers significant employer in rural areas while these employers are given specific coverage in the JCS policy;
- The JPU considers a definition of local employment for the SUEs would remove flexibility of employment use impacting unnecessarily on the viability of development;
- The terms town centre, central area and principal urban area are already defined in the JCS and Glossary;
- The JPU notes that consultation on the Daventry Master Plan is now complete;
- Safeguards for the Northampton North SUE are now in Policy N3;

The JPU accept the need for additional references to education proposals and a number of further references have been added to the JCS.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC032/SS to PC047/SS inclusive.

5.0 - Spatial Strategy

18. Policy S9 – Distribution of Retail Development

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S9 – Distribution of Retail Development	23	22	1	5	18	6	6	6	0

Summary of issues raised by Respondents

- Responses from major retailers raise the following issues:
 - Restricting proposals for retail development to the newly designated local centres only, fails to take account of need within existing areas;
 - Policies should be made sufficiently flexible to allow for new and the intensification of existing retail development that is well located to established built up housing areas, to help meet local needs and to provide access to such facilities by means of transport other than the car.
 - A single redevelopment scheme (Grosvenor Centre) is being relied upon to deliver the vast majority of the comparison goods requirement, which may not begin to deliver until towards the end of the plan period, and therefore the gap between the retail offers of Milton Keynes and Northampton could become exacerbated, to the detriment of Northampton as a whole. A flexible approach to allowing for appropriate out-of-town comparison goods floorspace to be delivered throughout the plan period must be incorporated.
 - The effective moratorium on 'out of centre' retail development without the opportunity to consider the relative merits of proposals is counterproductive, and directly contradicts the emphasis on sustainable economic growth within PPS4.
 - Reference to 'need' should be removed as this is not consistent with PPS4 which considers impact on the shopping hierarchy.
 - Replace 'central area' for 'town centre' in Paragraph 5.61.
- Respondents comment that Policy S9 and its supporting text should be amended to ensure that proposals for out-of-centre development will not have an adverse impact on the vitality and viability of Wellingborough town centre.
- Respondents express support for Policy S9 but consider that local authorities will need robust advice to counter claims of no adverse effect on town centres from retailers.
- Respondents consider that banks are important contributors to town centres and as such A2 uses should not be restricted.

Joint Planning Unit Response to Representations

Any proposals for retail development outside identified centres will be subject to sequential approach and an impact assessment. This approach is consistent with National Planning Policy Framework (NPPF).

Some flexibility has been introduced through Proposed Changes to allow for local retailing provided it is of an appropriate local scale and serves a local catchment.

The Retail Study Update 2012 capacity refresh indicates that there will be 37,500sqm net of comparison retail floorspace to 2026 for Northampton Borough. Approximately half of this is required between the period 2016 to 2021. Should the redevelopment of the Grosvenor Centre fail to deliver there are triggers within the monitoring section of the plan that would allow the retail picture for Northampton to be reconsidered.

The Proposed Changes suggest the removal of the word 'need'.

The Retail Study evidence base advises further convenience retailing is required in the town centre not central area.

Policy S9 is proposed to be changed to refer to impact assessment in relation to other identified centres.

Support for S9 is welcomed.

Reference specifically to banks within a strategic policy document is not appropriate. Detailed development management policies for retail frontages will be provided in other local plan documents.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC048/SS
PC049/SS
PC050/SS
PC051/SS
PC052/SS
PC053/SS
PC054/SS
PC055/SS
PC056/SS
PC057/SS
PC058/SS

5.0 - Spatial Strategy

19. Policy S10 - Sustainable Development Principles

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S10 – Sustainable Development Principles	39	26	13	5	34	13	13	8	0

Summary of issues raised by Respondents

- Respondents to policy S10 raise concerns about requiring new development to generate a minimum of 10 % of energy needs from renewable or decentralised low carbon sources and to comply with stipulated Code for Sustainable Homes (CSH) standards. The concerns are as follows:
 - The omission of a minimum threshold for compliance in terms of the scale/size of development;
 - Its overall inflexibility and inability to be assessed for compliance; and
 - The lack of evidence to justify the viability of this requirement is contrary to national policy.
- Respondents express the following concerns in relation to the stipulated Code for Sustainable Homes (CSH) standards:
 - The timing of CSH compliance renders this requirement obsolete;
 - Imposing this requirement will need to unnecessary duplication of national standards and place a heavy burden on developers;
 - Compliance with the Building Standards and other national initiatives is preferred to locally imposed standards; and
 - No evidence has been produced to justify the stipulated CSH levels. Compliance with this requirement that exceeds the minimum statutory Building Regulations standards will threaten the viability of housing delivery and will reduce affordability.

Joint Planning Unit Response to Representations

The approach to Policy S10 and Policy S11 has been revised in the light of representations and new evidence on the low carbon energy opportunities and heat mapping for the East Midlands and Northamptonshire published in 2011, the proposed changes to the implementation of the Code for Sustainable Homes published in 2010, proposed Government changes to Zero Carbon Homes standard including the introduction of a Carbon Compliance standard and “Allowable Solutions” mechanism.

Reference to the 10% target proposed to be deleted in the Policy text, but recast sustainable development principle to emphasise energy generation from decentralised and renewable or low carbon sources.

Evidence on viability testing in 2010 has demonstrated that Code level 4 is a reasonable minimum target for housing in the plan area until 2016.

The proposed changes align policy with the recommendations of the Zero Carbon Hub uses a more sophisticated Zero Carbon Policy triangle approach, that decreases the suitability of using a percentage figure in determining the most appropriate balance between use of decentralised energy, renewable energy and low carbon approaches for development.

The Zero Carbon Policy triangle prioritises fabric energy efficiency approaches coupled with performance of heating and lighting and cooling systems.(Carbon Compliance) though use of higher building regulations and use of the Code for Sustainable Homes, then using appropriate onsite low carbon technologies. Zero Carbon will not necessarily be achievable within the building fabric or the site and therefore near site and off site solutions may be required through a proposed Allowable Solutions mechanism to offset remaining carbon emissions.

Recommended Action

That the text be amended as set out in Proposed Changes:

PC059/SS

PC060/SS

PC061/SS

PC062/SS

PC063/SS

PC064/SS

PC065/SS

PC066/SS

PC067/SS

5.0 - Spatial Strategy

20. Policy S11: Renewable Energy

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy S11 – Renewable Energy	8	8	0	4	4	1	0	3	0

Summary of issues raised by Respondents

- Most representations recommend minor amendments to the wording of the policy.
- Respondents question the validity and soundness of the policy. A respondent argues that it is unclear as to what local perspective this policy adds that is specific to West Northamptonshire as it simply repeats national policy. Additionally, they consider that paragraphs 5.80 - 5.82 of the preamble do not provide sufficient information to justify the policy.
- A respondent submits that the policy fails to provide a positive framework for renewable energy development, as required by PPS22 and the PPS1 supplement. Furthermore, they submit that three of the four bullet-point criteria of Policy S11 are either ineffective development management policies, or are in conflict with national policy.

Joint Planning Unit Response to Representations

The approach to Policy S10 and Policy S11 has been revised in the light of representations and new evidence on the low carbon energy opportunities and heat mapping for the East Midlands and Northamptonshire published in 2011, the proposed changes to the implementation of the Code for Sustainable Homes published in 2010, proposed Government changes to Zero Carbon Homes standard including the introduction of a Carbon Compliance standard and “Allowable Solutions” mechanism.

Evidence on viability testing in 2010 has demonstrated that Code Level 4 is a reasonable minimum target for housing in the plan area until 2016.

The revised policy has used the new evidence base on low carbon energy opportunities and heat mapping to strengthen the consideration of use of decentralised energy in major development and Sustainable Urban Extensions, and to align the policy with national guidance and support for all forms of renewable and low carbon energy generation balanced with adverse impacts.

The proposed changes align policy with the recommendations of the Zero Carbon Hub using a more sophisticated Zero Carbon Policy triangle approach that decreases the suitability of using a percentage in determining the most appropriate balance between use of decentralised energy, renewable energy and low carbon approaches for development.

The Zero Carbon Policy triangle prioritised fabric energy efficiency approaches coupled with performance of heating and lighting and cooling systems (Carbon Compliance) though use of higher building regulations and use of the Code for Sustainable Homes, than using onsite low carbon technologies. Zero Carbon will not necessarily be achievable within the building fabric or the site and therefore near site and off site solutions may be required through a proposed Allowable Solutions mechanism to offset remaining carbon emissions.

Recommended Action

That the supporting text and policy be amended as set out in the Proposed Changes:

PC068/SS
PC069/SS
PC070/SS
PC071/SS
PC072/SS
PC073/SS

West Northamptonshire Wide Policies

21. Introductory Text to West Northamptonshire Wide Policies

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
West Northamptonshire Wide Policies	0	0	0	0	0	0	0	0	0

Summary of issues raised by Respondents

- No representations received

Joint Planning Unit Response to Representations

No response required.

Recommended Action

None

6.0 Connections

22. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	12	12	0	2	10	5	4	1	0

Summary of issues raised by Respondents

- The respondent considers that the Joint Core Strategy does not provide any clear indication of the relationship between the Northern Relief Road, including the Sandy Lane Relief Road as a temporary solution to the needs of the area and the later proposed alternative provision of a North West Bypass for the town.
- Respondents express concern that air quality will deteriorate further under the proposal to use the A508 to link traffic moving along the proposed Northern Relief Road to the Holly Lodge Road turning.
- The respondent questions how transport issues in developments will be enforced, monitored or addressed once they are built?
- The respondent questions the soundness of the North West Bypass proposal on the basis that it has been put forward without any proper consideration of its potential negative environmental impacts and has not been adequately addressed in the Sustainability Appraisal.

Joint Planning Unit Response to Representations

The JPU in conjunction with NCC have produced a Transport Options Technical Paper on sustainable patterns of growth for the JCS and solutions to a deliverable transport strategy to accommodate growth. Different transport options have been explored in the transport options paper to establish the most appropriate strategy to follow. The Northampton North West Bypass (NWBP) addresses a major pinch point on the network that cannot be addressed by other means. The NCC Corridor Review (2012) shows the NWBP is essential for delivering an acceptable level of impact on junctions in Northampton. Further solutions suggested by the Paper explored the relationship between Sandy Lane Relief Road and the NWBP in feasibility work and assessment of needs. Work shows that to meet the traffic demands of JCS growth that both the Sandy Lane Relief Road and the NWBP need to be in place by the end of the plan period. The Sandy Lane Relief Road is required from 2016 while the NWBP is required from 2021.

These new link roads make a contribution to modal shift in terms of encouraging bus use. Air quality on the A508 will be within tolerable levels while the NWBP will assist modal shift as above. The delivery of specific transport measures is shown in JCS Appendix 4 and the IDP. These show what measures will be delivered, the costs, and who will pay. The monitoring of JCS transport infrastructure is set out in

Appendix 6. Transport infrastructure measures will be carried out by the relevant transport providers with arrangements explained in the IDP. The proposed NWBP (Northern Relief Road) has been subject to Sustainability Appraisal as part of the JCS assessment process. A more detailed assessment will be carried out by Northamptonshire County Council on submission of a planning application for the NWBP scheme.

Recommended Action

No changes in response to representations.

6.0 Connections

23. Policy C1 – Changing Behaviour and Achieving Modal Shift

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy C1 – Changing Behaviour and Achieving Modal Shift	23	23	0	9	14	4	7	3	0

Summary of issues raised by Respondents

- The modal shift targets are a key focus of these representations with the following issues being raised:
 - Object to modal shift targets for all new developments which seek to achieve no more than 40% of trips made by the car;
 - Targets should not be absolute/ minimum targets, but should be treated as aspirational targets. A flexible approach is required;
 - Targets are impossible to achieve in rural areas;
 - Need to clarify timescales for the modal shift targets;
 - Modal Shift Targets should be set out in the policy;
 - Only way a 20% shift could be achieved is if a developer provides extra contributions. This would place a considerable cost burden on development sites which already subject to many planning obligations such as the provision of affordable housing; and
 - To achieve targets it will be necessary for growth to be located in rural areas. For example the significant development at Silverstone Circuit should have housing to support it, yet JCS policies limit the housing growth in larger villages like Silverstone.
- Respondents express concern that public transport schemes are unfeasible given recent reduction in public transport funding and do not appear to be factored into infrastructure costs.
- Respondents express concern that a bypass at Towcester Sustainable Urban Extension will encourage motorists to bypass Towcester.

Joint Planning Unit Response to Representations

The JCS recognises that in order to mitigate the impact of development that modal shift is required and sets targets to enable this. Policy C1 (Changing behaviour to enable modal shift) sets requirements for transport schemes to contribute to behavioural change and sets out supporting over-arching measures to be introduced across West Northamptonshire. The Northamptonshire County Council's Transport Strategy for Growth provides an evidence base for modal shift targets and for the

measures required to deliver them. Modal shift will be provided through an optimal pattern of development, the design of new development and improved travel options. The JCS SUE locations have been selected to take advantage of public transport corridors and services. Modal shift targets relate to the percentage reduction in single car occupancy journey to work.

The Northampton Rail station improvements and the new bus station will assist modal shift but only if gains are reinforced through travel behaviour in private development. Modal shift will be achieved through developer contributions but also WNDG and government funding in case of the Northampton railway station. The Northamptonshire Transportation Plan (NTP) also prioritises broadband improvements that help reduce the need to travel having secured funding towards this. Further details on key specific measures to help achieve modal shift are set out in the IDP. However modal shift targets need to be more than an aspiration in order to maximise the benefits of public investment and mitigate the effects of development with the JCS setting minima targets.

Timescales for the achievement of modal shift targets are not set to assist the viability of development. Further details on key specific measures to help achieve modal shift are set out in the Infrastructure Delivery Plan (IDP). Some measures need to be in place at the beginning of development while some smarter travel measures have a minimal impact on viability. Nevertheless the JPU is mindful of developers concerns over viability making Policy C1 more flexible with revised wording for its application.

The JPU agrees that schemes need to be better prioritised to favour modal shift and safeguard the strategic road network.

The JPU is aware of the difficulties faced in the provision of rural transport services as explained in Paragraph 6.27 of the JCS. Flexibility is applied to rural areas through Policy C5 and in Policy RC3 that sets out a transport strategy for rural areas. The JCS has accommodated housing growth in the most sustainable locations to make the best use of rural services.

The Towcester Relief Road is needed to serve SUE development while taking through traffic will create a better environment for users of Towcester town centre. Improved junctions on the A43 will mean better access to Towcester town centre. It is agreed that the Towcester “bypass” should be referred to as the Towcester “relief road” to better describe its role.

In response to general comments already not covered in the response above:

- It is agreed to add cross-reference on modal shift targets in Policy C2; and
- The JCS Appendix 4 and IDP includes the latest funding position for schemes having regard to “cuts in public spending” and shows that schemes are deliverable over the plan period.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC003/C

PC004/C

PC005/C

PC006/C

6.0 Connections

24. Policy C2 – New Developments

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy C2 – New Developments	26	26	0	11	15	7	6	2	0

Summary of issues raised by Respondents

- Four of the representations focus on the effectiveness of the policy as follows:
 - Proposed transport schemes are impractical given recent reduction in bus services;
 - It is expensive for developers to provide transport infrastructure to reduce car use. Modal Shift will take time to deliver and cars will be used until completion of the public transport infrastructure
 - Object to modal shift targets for all new developments which seek to achieve no more than 40% of trips made by the car;
 - The policy fails to tackle safety in anyway; and
 - Policy should refer to the numeric modal shift targets specified in the supporting text.
- Respondents challenge the justification for a number of the policy requirements as follows:
 - It is unclear why there is a need for a Travel Plan SPD for the production of travel plans as there is already national policy guidance on this matter;
 - It is unreasonable to expect small scale developments to accord with this policy;
 - The expectation that Sustainable Urban Extensions should ensure that new or enhanced public transport services are secured on occupation of the first dwelling is unreasonable and does not have regard to the level of existing services which may already be available and their potential adequacy;
 - Service providers require a critical mass before significant new services are provided. There is therefore a need, the respondent feels, to recognise the differing/ lower availability of existing public transport services in the market towns than exists in Northampton;
 - The developer cannot be penalised for its efforts to achieve modal shift targets if they ultimately fail, particularly where the spending choices are made by the local authority; and
 - Provision of enhanced public transport facilities will be reliant on the needs and requirements of operators not, solely, developers.

- The respondent makes specific comments in respect of the Grosvenor Centre and the need to continue to provide for cars within the development through a wording change to the policy.
- The respondent highlights problems they feel relate to the phasing of the Brackley SUE and the need for linkages to be provided. It is argued that the Eastern SUE has a crucial role to play in providing the routes and should be built before the Northern SUE as the Northern SUE relies heavily on routes provided by the Eastern SUE.

Joint Planning Unit Response to Representations

Policy C2 seeks to optimise the contribution that developments can make to modal shift through, minima targets, the approach to transport assessments and requirements for SUEs. The design of new development influences travel behaviour and the delivery of modal shift targets. The delivery of modal shift targets helps mitigate the need for less sustainable transport measures. Modal shift targets relate to the percentage reduction in single car occupancy journey to work. Northamptonshire County Council intends to produce more detail on modal shift in its Smarter Travel Choices document that will comprise part of the Northamptonshire Transportation Plan (NTP).

The Northampton Rail station improvements and the new bus station will improve modal shift but only if modal gains are maximised through travel behaviour in private development. Modal shift will be achieved through developer contributions, NTP measures, and WNDC and government funding in case of the railway station. The NTP has taken account of available budgets and likelihood of grant funding with regard to public transport schemes. Proposed transport schemes are shown in the NTP and the IDP to remain deliverable over the JCS timeframe.

Some smarter travel measures such as travel information can be in place on occupation of the first dwellings with minimal impact on development viability. The JPU has clarified smarter travel measures in the JCS. However the JCS recognises the need to ensure viability with Policy C2 made more flexible to take account of the viability of such sites and the most sustainable travel solutions. The County Council has stated its intention to produce more detail on modal shift targets in a Smarter Travel Choices document that will form part of the NTP.

The JPU do not agree that safety is disregarded by the JCS. JCS Policies on traffic management deal appropriately with safety issues. Traffic management measures are set out in Policy C3, the IDP, and the NTP. NTP Policy 12 specifically deals with matters of safety on the highway network.

The JPU note that national guidance on Transport Assessments have triggers for large developments. The NPPF encourages sustainable solutions to transport issues. The JPU and partners consider smaller developments can also contribute to smarter travel measures. SPD will provide the most locally specific way of setting triggers best related to the optimum modal shift the local area can deliver.

The highway authority has stated that Park and Ride sites are unlikely to be brought forward within the plan period. The JPU accepts therefore that Policy C2 should be

made more explicit to make clear that development must mitigate its effects on the highway.

In response to general comments not covered in the response above:

- The JCS policies seek to maximise contributions to modal shift subject to development viability;
- The NTP and IDP take account of budget and service provision following “budget cuts” taking account of expected future spending levels;
- It is agreed that a cross-reference to the modal shift targets be added to Policy C2;
- Brackley East SUE can be developed independently of the Brackley North SUE;
- Policy amendments take account of the Grosvenor Centre in changes to Policy N1; and
- Contributions from developers help to maximise modal shift but are not the only contributors to modal shift.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC007/C
PC008/C
PC009/C
PC010/C

6.0 Connections

25. Policy C3 – Strategic Connections

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy C3 – Strategic Connections	16	16	0	7	9	2	7	0	0

Summary of issues raised by Respondents

- Respondents propose the following amendments/ additions to the initiatives listed in the policy:
 - Could include reference to provision of park and ride facilities to compliment Sustainable Urban Extensions where required. e.g. Northampton North?
 - It would be logical to recognise that A43 junction modifications and road improvements also include the A5 to A43 bypass at Towcester;
 - The Northampton Growth Management Strategy should be referred to under the "Road" heading, as the scheme is well developed and is intended to be mainly delivered through developer contributions;
 - The policy wording relating to Water Strategic Connections is very unspecific and could be made more meaningful through references to provision of interchange facilities, enhanced water supply and channel dimensions; and
 - Amend bullet to read "Implementation of an Inter-Urban Coach service to connect to the Midland Mainline and improved journey times/ connections to access the East Midlands Airport."

- Respondents' representations focus on the delivery of transport infrastructure and raise the following issues:
 - JCS should set out how the A45 Improvements are to be funded - what funding streams have been identified/ will be identified, and a timetable for implementation of them and by whom;
 - A new access to Moulton College is required from the A43 to address existing traffic problems;
 - A respondent is querying whether their £375m Infrastructure funding offer has been given any consideration by the WNJPU; and
 - Concerned that period of the JCS is not sufficiently long to give confidence and certainty to investors in infrastructure and those delivering it.

- Period is sufficient to provide clarity on infrastructure investment.
 - The IDP has not been able to correctly identify or prioritise key primary infrastructure in terms of its cost, funding and delivery. The Towcester SUE proposal is an example of defining a growth location prior to the adoption of the A5 Bypass;

- What measures are being put in place to ensure rail services through Northampton are at a standard to support increase in housing as it is inevitable that many people will be working out of the area and likely to be commuting to London;
- More consideration must be given to existing traffic congestion on the M1 in the County; and
- It is suggested that further consideration be given to the robustness of the improvements detailed to improve the A43 and deliver the Northampton North SUE as no details are given in the IDP.

Joint Planning Unit Response to Representations

Policy C3 aims to maintain and enhance strategic connections working with partners to secure improvements and enhancement measures. The JPU has worked closely with the Highways Agency and Northamptonshire County Council to assess and mitigate impacts on the strategic road network. The JPU and partners have assessed the impact of development on the A45/M1 corridor through the Northampton Growth Management Scheme agreeing a Memorandum of Understanding with the Highways Agency mitigating the growth of Northampton. As a result Policy C3 now refers to delivery of the M1/A45 NGMS. The supporting text to Policy C3 sets out how contributions will be secured through flexible mechanisms from developers. The IDP/JCS Appendix 4 refers to the specific junctions measures that comprise the NGMS.

The JPU has considered the suggestion that further reference be given to the robustness of the improvements to improve the A43 and deliver the Northampton North SUE. The development of the SUE requires a solution to congestion on the A43 and in particular the capacity of the A43 between Round Spinney Roundabout and Overstone Lane. The County Council as local highway authority is supportive of an improvement to the strategic corridor link between Kettering and Northampton. Whilst the improvement of the strategic link is not a requirement of the SUE development, the development could accommodate the County Council's aspiration. The JPU has therefore amended Policy N3 accordingly while a reference to A43 improvements has been added to Policy C3 reflecting those in the North Northamptonshire Joint Core Strategy.

The highway authority has stated that Park and Ride sites are unlikely to be brought forward within the plan period. The JPU accepts therefore that Policy C2 be strengthened to make clear that development must mitigate its effects on the highway. A local interchange is proposed for Northampton North SUE.

In response to general comments already not covered in the response above:

- The JPU agree the suggested amendments should be made to Policy C3 regards "Implementation of an Inter-Urban Coach service to connect to the Midland Mainline and improved journey times/ connections to access the East Midlands Airport.";

- Further reference made in the IDP that the A43 will require junction improvements to accommodate traffic from growth around Towcester and Silverstone;
- The policy wording on water connections is considered to be appropriate;
- The locations relating to the £375m Infrastructure funding offer have not been found to be sustainable. The offer is not therefore acceptable;
- The JPU consider the period of the JCS is sufficiently long to give confidence to investors in infrastructure with this shown by JCS Appendix 4 and the IDP;
- Infrastructure for Towcester SUE is correctly addressed by JCS Appendix 4 and in the IDP including the A5 Relief Road;
- Policies C1, C3, and C4 set out the approach to improving rail services while sustainable and viable improvements are included in JCS Appendix 4 and the IDP; and
- Impact on the M1 is addressed through the NGMS that assessed the impact of development on the Strategic Road Network.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC011/C
PC012/C
PC013/C
PC014/C
PC015/C
PC016/C
PC017/C
PC018/C
PC019/C

6.0 Connections

26. Policy C4 – Connecting Urban Areas

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy C4 – Connecting Urban Areas	8	8	0	6	2	0	2	0	0

Summary of issues raised by Respondents

- Respondents propose the following amendments/ additions to the proposals listed in the policy:
 - The policy should refer to improved transport links to DIRFT;
 - The road between Daventry-Northampton is part A45, part A4500. The policy should therefore read “A45/A4500 Daventry to Northampton”;
 - Policy N8 identifies need for a park and ride site on A5199, which is not included in the priority network. This appears to be an inconsistency that needs to be addressed;
 - The reference to A43/ A361 Brackley to Cherwell District requires amendment as A361 does not lead from Brackley to Cherwell district; and
 - Daventry should be included in the A5 corridor link to Milton Keynes as the town is a big employment draw for people and shoppers.
- Respondents also seek further clarifications of the following aspects of the policy:
 - Clarity of the policy could be improved as it is not currently evident whether any of the proposed public transport measures are needed to support the JCS or if they are deliverable;
 - The present the nature of the Arc Transit system is not defined and accordingly the JCS should not assume it will be entirely bus-based; and
 - More detail on the A45 Northampton to Wellingborough and A43 Northampton to Kettering routes is needed.

Joint Planning Unit Response to Representations

Policy C4 identifies sustainable connections between urban areas and improvements to public transport interchanges. The NTP supported by work from WNDC and Northampton Borough Council sets out how public transport interchanges will be improved and delivered. The Northamptonshire County Council Arc report indicates potential for the inter-urban bus network within the County. The Arc report and NTP propose the development of a high quality Northamptonshire Arc Transit network to provide mass transit links between the main urban areas. The JPU notes the present nature of the Arc Transit system may not be entirely bus-based making an amendment to Policy C3 to take this into account.

The JPU agree to correct a drafting error referring to the A43/ A361 Brackley to Cherwell District corridor by showing that two distinct corridors exist on the A43 and A361 respectively. The JPU accept that more detail on the delivery of such improvements be made with a cross-reference to Appendix 4 of the JCS and the IDP.

The highway authority has stated that Park and Ride sites are unlikely to be brought forward within the plan period. The JPU accepts therefore that Policy C2 be strengthened to make clear that development must mitigate its effects on the highway. The JPU therefore agree that reference to the park and ride site on the A5199 in Policy N8 be removed.

It is considered that improved transport links to DIRFT requested by respective transport authorities are adequately dealt with by Policy C4 and the IDP. Specific mitigation measures for DIRFT 3 are a matter for consideration by the Major Infrastructure Planning Unit.

In response to general comments already not covered in the response above:

- The JPU agrees the road between Daventry and Northampton is part A45, part A4500, and consequently the policy should be amended to read “A45/A4500 Daventry to Northampton;
- Strategic corridors are agreed with the highway authorities who do not consider it necessary to add Daventry to the Towcester A5 corridor;
- Amendment to Policy C3 refers to A43 to Kettering Improvements and to the A45 junction improvements; and
- The public transport measures identified are required to deliver modal shift. The delivery of these measures is addressed in Appendix 4 of the JCS and the IDP.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC020/C
PC021/C
PC022/C

6.0 Connections

27. Policy C5 – Enhancing Local and Neighbourhood Connections

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy C5 – Enhancing Local and Neighbourhood Connections	9	9	0	6	3	1	1	1	0

Summary of issues raised by Respondents

- Respondents' query whether park and ride should be included in the local connections section or whether it would be more appropriate to include it in Policy C4.
- Respondents consider Daventry should also be included as a park and ride location, with a prospective A45 Park and Ride site serving both Daventry (local) and Northampton (inter-urban).
- Respondents argue that the Brackley East Sustainable Urban Extension will provide crucial local connections and should be developed in advance of Brackley North.

Joint Planning Unit Response to Representations

The highway authority has stated that Park and Ride sites are unlikely to be brought forward within the plan period. The JPU accepts therefore that Policy C2 be strengthened to make clear that development mitigate its effects on the highway network. The highway authority continue to support the provision of park and ride by developers as a way of mitigating impact on the highway network but no longer propose specific locations. Any Park and Ride schemes are a matter for detailed consideration by developers and the local transport authority as set out in Policies C5 and C2.

Brackley East SUE can be developed independently of the Brackley North SUE.

Recommended Action

That the policy be amended as set out in Proposed Change:

PC023/C

6.0 Connections

28. Policy C6 – High Speed Rail 2

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy C6 – High Speed Rail 2	4	4	0	2	2	1	1	0	0

Summary of issues raised by Respondents

- Respondents consider the Joint Core Strategy should take High Speed 2 into account in terms of how the WNJPU propose to engage with the development/emergence of this project and how allocated sites will be protected against its effects.
- Respondents consider it is not clear how Policy C6 would be enforced, as the constituent authorities in the WNJPU will be no more than consultees, as acknowledged in the supporting text (Paragraph 6.29).
- Respondents feel that given the expected "major impact" of HS2 on Brackley, it is surprising Brackley East and Brackley North SUE policies do not refer to HS2 in any way. Policies should take account of HS2 and its potential to affect the two SUEs.
- Respondents consider that HS2 could harm heritage assets including Edgcote House, and its park, a scheduled monument and the Battle of Edgcote site. This should be acknowledged in the policy.
- Respondents are concerned at the lack of detail in the information published for consultation and the degree to which this makes the consultation process sound.
- Respondent considers that Northampton suffers from longer rail journey times and service frequencies compared to other stations served by Inter-City services. It is essential that if HS2 is built that existing rail services should also be improved. Improved journey times/ service frequencies are critical to ensure the area retains its economic competitiveness and this should be outlined in Policy C6 or its pretext.

Joint Planning Unit Response to Representations

The JCS appropriately addresses the High Speed 2 proposal and how allocated sites will be protected against its effects in the JCS SUE and environmental policies.

As acknowledged in the supporting text JCS policies will contribute to and help shape HS2 proposals as these emerge.

The JCS takes account of the impact of HS2 on Brackley through Policy C6 and Brackley East and Brackley North SUE policies.

The JCS notes that impacts on the environment and local community caused by HS2 should be minimised.

The JCS has followed a full consultation on the JCS proposals while the government have pursued necessary consultation on detailed proposals. Further reference is made to the latest stage of national consultation in the JCS.

Policy C6 seeks HS2 to be accompanied by improved existing rail services on the West Coast Main Line, while an example is added to JCS supporting text.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC024/C

PC025/C

PC026/C

7.0 Regenerating and Developing Communities

29. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	5	5	0	3	2	0	2	0	0

Summary of issues raised by Respondents

- A respondent considers that the Plan fails to grasp the challenge of regeneration opportunities. They feel there are two major omissions from both the Emergent JCS and the Pre-Submission JCS, these being the 44 acres at Northampton General Hospital Site and 75 plus acres at Daventry Marches. They consider that the redevelopment of both of these sites will change the dynamics and inward investment opportunities for Northampton and Daventry 'central areas' and indeed for the 'whole community' of West Northamptonshire and need to be part of a compelling vision for a plan period to 2031.
- One respondent feels that this section should address rural communities/deprivation.
- One respondent reports that Paragraph 7.3 identifies the need for four key attributes to be considered in the need for and delivery of regeneration, relating to: economic, social, physical and environmental. However, the respondent feels that the datasets used to measure deprivation, as listed in Paragraph 7.16, relate only to the first three of these attributes (living standards, crime, housing condition etc). They feel that environmental measures can also be used to determine regeneration priorities. They also point out that a large amount of data on the condition of a wide range of environmental indicators is available that may be used for such assessment.
- A respondent feels that Paragraph 7.11 refers to further work that may need to be undertaken in DPDs and strategies but that the JCS does not identify who will take this area of work forward, the resources available or what priority there is on this work compared to other work areas identified in the JCS. They feel the JCS needs to ensure that there is commitment to undertake this work, or alternatively delete reference to it.
- One respondent suggests a number of minor changes to aid clarity and comprehension including clearer references to social and cultural facilities.

Joint Planning Unit Response to Representations

The JCS meets the challenge of regeneration including policies on town centre regeneration, community regeneration, and rural regeneration. Some of these contain significant amounts of land identified for development within urban areas while encouraging appropriate opportunities in rural communities. The JPU

considers that rural communities/rural deprivation are adequately addressed by the range of indicators in the regeneration section and the rural policies of the plan.

In response to general comments already not covered in the response above:

- No detailed proposals for the relocation of the Hospital within the plan period have been put to the JPU.
- The JPU considers that environmental factors are appropriately addressed in the deprivation measures with living standards/environment being in the Index of Multiple Deprivation (IMD).
- The Revised Local Development Scheme (June 2012) sets out the project plan for Local Plan document production.
- The JPU agrees with a number of the minor changes put forward to aid clarity and comprehension including clearer references to social and cultural facilities.
- The JPU agrees that extra references to facilities be added and that the protection of these be strengthened in Policy RC2 and the supporting text.

Recommended Action

That the introductory text be amended as set out in Proposed Change:

PC001/RC

7.0 Regenerating and Developing Communities

30. Policy RC1 – Delivering Community Regeneration

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy RC1 – Delivering Community Regeneration	6	6	0	4	2	0	1	1	0

Summary of issues raised by Respondents

- One respondent suggests that table 3 intimates that Village Design Statements (VDS) will be important 'local' policy documents. They also wonder whether local councils are committed to reviewing and helping communities to get VDS complete and adopted?
- One respondent feels that the role of churches as critical partners, including alongside partners from the Third Sector, should be acknowledged in the JCS. The respondent also considers that the Faith Sector has shown itself to be innovative and with the ability to deliver long term benefits to locals communities.
- Respondents consider reference could be added in the JCS to the forthcoming Localism Bill.
- Some respondents express support for this policy.

Joint Planning Unit Response to Representations

The support for this policy is welcomed.

The JCS agrees that a reference be made to the voluntary sector including faith groups in supporting text to Policy RC1.

The JPU considers that the JCS rural policies offer a range of measures to deal with rural issues including design.

The JPU agrees that reference be made to Church Halls in the supporting text to Policy RC1.

The JPU agrees that reference to the Localism Act 2011 be added to the JCS.

Recommended Action

That the supporting text and table 3 be amended as set out in Proposed Changes:

PC002/RC

PC003/RC

7.0 Regenerating and Developing Communities

31. Introductory Text to Policy RC2

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	5	5	0	3	2	0	2	0	0

Summary of issues raised by Respondents

- One respondent considers that it should be acknowledged in the JCS that community needs extend beyond physical infrastructure and buildings.
- They also consider that the significant contribution made by Churches and most other faith communities as community assets is ignored and that the JCS should include reference to these.
- One respondent feels that the JCS should set out a clear policy with regard to the suitability of former public and community buildings and commercial buildings located outside residential areas as appropriate locations for places of worship and associated community activities. They feel this, would of course, be subject to such buildings satisfying any requirements set out in policy.
- One respondent considers that Paragraph 7.26 should list Places of Worship or Religious Buildings as an emboldened bullet point. They also feel that such places are essential for sustaining a mixed use environment.
- A respondent considers in relation to Page 70 that it is suggested that the sub-heading should refer to ‘Public’ Open Spaces and Paragraph 7.34 should distinguish between open space and green infrastructure in Paragraphs 10.8-10.12. They feel that it is not clear whether the protection of incidental open space, private gardens, public rights of way, canals etc. are dealt with here or under green infrastructure. They feel that clarity is needed when assessing planning applications that involve the loss of open space.
- Some respondents consider that it is unclear who will prepare the Developer Contributions SPD.

Joint Planning Unit Response to Representations

The JPU consider that Policy RC2 is a spatial policy extending beyond land use issues in trying to protect locally valued facilities that may lack commercial viability. However, it is accepted that a further reference be added to voluntary and faith groups in the supporting text to Policy RC1.

The JPU agrees that a reference to church hall facilities be added and that the protection of community facilities be strengthened in Policy RC2 and supporting text.

It is considered that new community buildings are encouraged by Policy RC2 and its supporting text.

Policy RC2 addresses private and public open space while more specific definitions would be in specific open space assessments.

The Partner Councils will progress a Developer Contributions SPD.

Recommended Action

That the supporting text be amended as set out in Proposed Changes:

- PC004/RC
- PC005/RC
- PC006/RC
- PC007/RC
- PC008/RC
- PC009/RC
- PC010/RC
- PC011/RC
- PC012/RC

7.0 Regenerating and Developing Communities

32. Policy RC2: Community Needs

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy RC2 – Community Needs	15	9	6	6	9	4	3	2	0

Summary of issues raised by Respondents

- A respondent considers that it is unclear how the JCS or subsequent DPDs might provide existing cultural facilities any protection from closure, decline or enhancement. They feel that Policy RC2 should have a wider focus to include the protection and enhancement of existing community and cultural facilities to reflect the description of the term 'social infrastructure' or Policy E7 could be expanded to protect existing cultural facilities. They also feel that the description of the term 'social infrastructure' could be deleted and a new entry made in the Glossary for 'community facilities' along the lines of community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. They go onto feel that for consistency, continuity and clarity, sui generis should be included in the Glossary for buildings that are not in any Use Class such as theatres, petrol filling stations, nightclubs and launderettes.
- Some respondents feel that Policy RC2 does not comply with Community Infrastructure Levy (CIL) Regulation 122. The JCS should properly be a high level strategy document and, as such, it should not rely upon preceding SPD's which will not have been subject to examination and may pre-date the introduction of the CIL Regulations (6th April 2010) pursuant to what should be the establishment of the overarching principles in the JCS. They also feel that there is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy, in this case Policy RC2, may not be justified, effective or legally sound. They also feel that reference to previous PPG17 studies should be deleted.
- One respondent considers that the strategic allocations identified in the JCS will not necessarily require the preparation of Development Management and Site Allocations Development Plan Documents (DPDs). For example, Policy N5 refers to the Northampton South SUE requiring only a master plan rather than any DPD. Accordingly for reasons of clarity and not being the most appropriate strategy, the respondent feels that JCS Policy RC2 should be amended to reflect this approach for the SUE's.
- Respondents feel that the JCS should not explicitly refer to the PPG17 studies; the West Northamptonshire Sports Facilities Strategy or the Cultural Investment Plan within the policy as these have not have been subject to examination. They feel that their inclusion within Policy RC2 would have the effect of giving these

documents development plan status and that this is not justified. They feel reference to previous PPG17 studies, the Sports Facility Strategy and the Cultural Investment Plan from Policy RC2 should be deleted from the JCS.

- Some respondents feel that regarding policy RC2 (the first bullet point referring to replacement of equal quality) of equal importance, they consider, is the location of any such replacement. The loss of a sports pitch within an urban area cannot be adequately replaced by a new facility in the middle of the countryside, especially if it is not accessible by public transport. The respondent suggests that at the end of the first bullet it should say “A replacement facility of equal or better quality and accessibility”.
- Some respondents express support for the policy.

Joint Planning Unit Response to Representations

The JPU considers that Policy RC2 is an appropriate policy to include in the JCS. The Development Contributions SPD is also appropriate for adding further detail on meeting community needs. The requirements of the SPD would comply with those suggested by National Planning Policy Framework (NPPF).

The SPD is not considered contrary to the introduction of the CIL Regulations.

It is agreed that Policy RC2 should include the protection of existing community facilities with an appropriate reference added to Policy RC2.

The JPU considers that reference to open space or “PPG17 studies” is necessary as these are part of the JCS evidence base subject to the JCS consultation process. However, it is agreed reference to PPG17 studies should be clarified.

The JPU agrees that accessibility be added to the criteria in Policy RC2.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC013/RC
PC014/RC
PC015/RC
PC016/RC
PC017/RC
PC018/RC

8.0 Economic Advantage

33. Introduction

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	7	7	0	4	3	2	1	0	0

Summary of issues raised by Respondents

- Respondents consider that the JCS needs to be more responsive to accommodating the demands of the market. The respondents feel that the lack of supply of large (in excess of 20,000 square metres) floor space opportunities within the area will mean inward investors will not look to the West Northamptonshire area for speculative development, or long term plans. The respondent advises of an option on land in a strategic location, just south of the M1, Junction 15A, which they state is a prime, deliverable site for employment use to meet the demand for space that is strong in the Northamptonshire area and should be allocated as a strategic employment site within the JCS.
- The respondents consider that the JCS policies do not adequately reflect the economic potential of the area as a key driver for growth and economic prosperity. The respondents believe the JCS appears as a restriction on jobs growth through a reduction of housing targets. The respondents also believe that the disparity between 50,150 homes and 16,000 jobs needs to be clarified within the plan and the evidence base. The respondents point to the Strategic Employment Land Assessment which provides an indicative forecast of a requirement for 68,119 jobs for the 2001- 2026 period based on a TEMPRO trend based model of employment growth rate building on the strong growth rates of previous years.
- The respondents broadly support the Economic Advantage policies.

Joint Planning Unit Response to Representations

The 2010 WNELS and the updated 2012 WNELS show that land is still available for such B8/logistics at DIRFT, Swan Valley, Brackmills Point, and other locations that will be attractive to the market. The employment strategy is one of balance allowing the expansion of B8 but also encouraging more job creation in the most sustainable locations available over the plan period. Enabling the regeneration of key town centre and edge of centre locations will in the long-term make stronger town centres with higher employment densities than out-of town locations. However, the JPU accept that clarification of the role of B8 would make the approach clearer and this is added to the relevant JCS supporting text.

The economic strategy of the JCS has been discussed with partners including both Local Economic Partnerships. The strategy is an ambitious one given the impact of

the recession and the need to rebalance the economy with quality jobs next to central areas including use of derelict land and underused sites. The approach builds on key decisions of government and partners especially the creation of the SEMLEP Northampton Waterside Enterprise Zone. This provides a unique opportunity for synergy between the SEMLEP Northampton Waterside Enterprise Zone and the town centre and sustainable economic development for the West Northamptonshire area. This strategy will strengthen the economic offer of the area more sustainably than using out-of centre locations.

The JPU notes the Temprow jobs projection performs badly against actual jobs growth with the recession creating job losses rather than growth. A double dip recession in the UK is a matter of fact meaning the early years of the plan period will be one of returning to base levels. Nevertheless, the JPU accepts the need for contingencies in the approach that deal with stronger jobs growth. In the light of this the reference value approach now incorporates a stronger plan monitor process with clear review triggers for stronger jobs growth and maintaining an adequate employment land supply. The JPU accepts that Policy S7 should be amended so as to make up for job losses while review triggers in Appendix 6 of the JCS ensure that unexpected job increases can be taken into account.

The disparity between the Strategic Employment Land Assessment and JCS employment levels are due to:

- SELA including Non B-jobs unlike the Regional Spatial Strategy (RSS) or JCS projections; and
- SELA (and RSS) based on pre-recession levels of growth as opposed to the available labour force or the effects of recession on growth

Further explanation of the jobs target is provided in the Employment Technical Paper. WNELS explains that SELA targets are not likely to be reached because of limited growth in the local workforce and the impact of recession. The recession is impacting on the local economy and will continue to impact especially in the early part of the plan period.

Recommended Action

No changes are proposed to the Introduction Section, but changes are proposed to parts of the Spatial Strategy Section and Appendix 6 as referred to above.

8.0 Economic Advantage

34. Policy E1 – Existing Employment Areas

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E1 – Existing Employment Areas	19	16	3	4	15	4	6	4	1

Summary of issues raised by Respondents

- The respondent considers that although titled 'Existing Employment Areas', the Policy also refers to allocated employment sites and this requires clarification.
- The respondent questions what the JCS intends by reference to investment of a "scale commensurate with" the function of the town. The respondent considers clarity is required on the word 'commercial' in the policy as the remainder of the policy refers to 'employment' and 'industrial uses'.
- The respondent considers that the JCS is unclear on what is intended for the new employment space at Kings Heath.
- The respondent objects to reference to 'non-strategic' B8 in Policy E1.
- The respondent considers that the JCS does not reflect the strategic advantage West Northamptonshire has for distribution. The respondent considers that existing sites are unsuitable for distribution and consequently new sites need to be allocated. In this respect the respondent considers Swan Valley can continue and develop the role of a gateway location to Northampton and a new site such as Junction 16 (Midway Park) should be allocated.
- A respondent considers that the policy and/ or its explanatory text should acknowledge that the Minerals and Waste Development Framework identifies industrial areas, and in the case of the locations for Waste Development the DPD designates certain industrial areas, within which waste management uses would be acceptable in principle.
- The respondent considers that the Policy is not consistent with PPS4 and more flexibility is required within the policy. The respondent considers the policy should be redrafted to focus on strategically important sites and allow a more flexible approach to other, historic 'employment sites'.
- The respondent considers the policy is unduly onerous particularly where economic viability is not always clear cut, and harmful impact or benefits of redevelopment are subjective. The respondent considers there is no need to prevent the change of use of all employment sites to other uses as is sought by the policy.
- The respondent considers the policy is contrary to national guidance in PPS3 which advises LPAs to consider the release of employment sites for housing.
- The respondent considers the policy runs counter to the proposals by the Government to make it easier to switch from office to housing use. Consequently

the respondent considers the first two paragraphs of the policy should be deleted.

- The respondents consider there is an insufficient of supply of high quality commercial floorspace. The respondents also consider there is a deficit of available unconstrained land across Northampton to meet employment growth in the short term and a severe shortage in the long term. The respondents consider that the JCS offers little to suggest how these sites will be delivered.
- The respondents support the policy approach.

Joint Planning Unit Response to Representations

An up to date assessment of employment land (WNELS 2010 & 2012) shows the important role played by serviced existing employment areas in providing for employment needs. The assessment looks at specific employment areas in detail to assess what land is no longer fit for employment purposes. Policy E1 follows the National Planning Policy Framework (NPPF) by identifying what land uses it wishes to protect while ensuring that such land is fit for that purpose. In addition the JPU has added further flexibility to Policy E1 in its approach to considering other uses where sites are no longer fit for employment uses. WNELS makes a distinction between the smaller non-strategic B8 uses needed to support the local economy and larger units that have a wider logistics function. The JPU agree a definition of 'non-strategic' B8 in Policy E1 is required with this added to supporting text.

A new strategic site at Junction 16 (Midway Park) is not required to meet JCS needs while likely to compete with more sustainable employment land, including derelict land in the SEMLEP Northampton Waterside Enterprise Zone, within Northampton.

Policy E1 applies to both existing and allocated employment sites as explained in the policy text. The JPU consider a "scale commensurate with the function of the town" ensures a flexible approach optimising provision. The phrase "scale commensurate with" the function of the town is needed to ensure the relationship between settlements is complemented and not harmed.

In response to general comments not covered in the response above:

- More flexibility has been added to Policy E1 through the supporting text in line with the NPPF. The JPU consider Policy E1 to comply with NPPF;
- The intentions of the JCS for new employment space at Kings Heath are dealt with in Policy N7;
- It is not necessary for the JCS to repeat the policies of the Minerals and Waste Local Development Framework (MWLDF). The Introduction section of the JCS draws attention to the MWLDF and the fact that regard should be had to it as well as the policies within the JCS and other Local Plans;
- The reasons for protecting employment land are explained in the JCS supporting text and in WNELS;

- There are measures in place to support the provision of high quality commercial floorspace including the SEMLEP Northampton Waterside Enterprise Zone; and
- Policy E1 already includes reference to the viability of development.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC001/E
PC002/E

8.0 Economic Advantage

35. Policy E2 – New Office Floorspace

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E2 – New Office Floorspace	14	8	6	2	12	4	4	3	1

Summary of issues raised by Respondents

- The respondents consider the policy is not consistent with Government policy at PPS4 which allows for a sequential approach beyond town centres.
- The respondent questions what the JCS intends by reference to investment of a “scale commensurate with” the function of the town in respect of new commercial floorspace at Towcester,
- The respondent comments that if employment is to be viable at Towcester it will be critically important to be able to deliver major office development.
- The respondent comments that if employment is to be viable at Kings Heath it will be critically important to be able to deliver major office development.
- The respondent questions the relevance of referring to the need to retain manufacturing jobs in the supporting text of an office development policy.
- A respondent comments that as Paragraph 8.7 refers to other DPDs there is a need to identify priorities, timescales and resources for each DPD/SPD to avoid raising unfair expectations.
- Respondents express support for the policy approach.

Joint Planning Unit Response to Representations

WNELS (2010 and 2012) provides the evidence base for office needs in the area including its town centres. The National Planning Policy Framework requires a town-centre first approach for town centre uses including offices and Policy E2 supports this approach. However, Policy E2 does not apply a sequential test to small scale rural office proposals in line with NPPF to ensure a flexible approach.

Towcester town centre is designated as suitable for office development. Significant employment land is allocated at Towcester South and Kings Heath to accommodate sufficient office development to meet needs. The Northampton Central Area Action Plan, as set out in the Revised Local Development Scheme (June 2012), will support regeneration including office provision. There is however a need for a balanced economy including manufacturing as well as office development.

Recommended Action

That the supporting text be amended as set out in Proposed Changes:

PC003/E
PC004/E
PC005/E

.

8.0 Economic Advantage

36. Policy E3 – Technology Realm

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E3 – Technology Realm, Northampton North	7	6	1	1	6	2	2	1	1

Summary of issues raised by Respondents

- The respondent considers that the policy is overly prescriptive, particularly regarding site size, and scale and the form of units. The respondent considers the policy should be rolled in with Policy N3 Northampton North SUE and Policy E3 deleted.
- The respondents consider delivery and timing of the Technology Realm with the SUE delivery is unclear.
- The respondent welcomes the allocation of a Technology Realm but considers a strategic site of at least 28 hectares (112,000 sq m) linked to an urban extension is required to meet the policy objective.
- The respondent comments that the range of employment uses specified means that it is unlikely to compete with Northampton central area as the preferred and primary destination for B1, which is to be supported.
- The respondent considers the Northampton North area is already subject to significant congestion and major road works will be necessary to facilitate the development.
- A respondent considers that Proposals Map 5 - Inset 10 should show the location of the Technology Realm and the route of the 650mm diameter (2' 2") high pressure gas main.

Joint Planning Unit Response to Representations

The JPU considers that the Technology Realm framework will be more sustainable and viable if moved to the SEMLEP Northampton Waterside Enterprise Zone. The initiative is based on linkages with education particularly the University of Northampton who are now actively progressing plans to relocate to central Northampton. An enterprise zone has been announced in central Northampton and it is crucial that synergy exists between economic initiatives. The JPU has agreed with NEP and SEMLEP that elements of the framework are worthy of retention but that the revised Technology Realm framework is more viable and sustainable within the SEMLEP Northampton Waterside Enterprise Zone.

The delivery of the Technology Realm will be supported by NEP and SEMLEP while its viability will benefit from the measures in place to attract new commercial activity attached to the Enterprise Zone. Employment provision is still to be made at the Northampton North SUE but for local employment provision. The JPU has agreed with the Local Economic Partnerships that the Technology Realm framework need not include a land allocation but instead comprise a policy enabling a range of starter and grow-on units. The SEMLEP Northampton Waterside Enterprise Zone location allows the new policy to not be prescriptive regarding the size, scale and form of units in order to minimise impact on development viability.

Transport improvements for the Northampton North SUE are listed in the JCS Appendix 4 and the IDP.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC006/E
PC007/E
PC008/E
PC009/E

8.0 Economic Advantage

37. Policy E4 – Daventry International Rail Freight Terminal (DIRFT)

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E4 – Daventry International Rail Freight Terminal (DIRFT)	11	7	4	3	8	2	4	2	0

Summary of issues raised by Respondents

- Whilst supporting the general thrust of the policy the respondent considers the final sentence of Paragraph 8.14 which reads: 'The floorspace to be provided at DIRFT 2 is counted as part of the 2010 to 2021 supply of warehouse and distribution for the West Northamptonshire area.' should be deleted.
- The respondent considers any floorspace targets set out for rail-related strategic distribution development in any evidence base should not be regarded as maxima and this should be added to the JCS text. The respondent considers an increased focus on rail freight movement by the retail, logistics and rail industry is likely to increase demand for rail freight interchange development in the plan area, bringing with them significant economic and sustainability advantages.
- The respondent considers additional text should be added to paragraph 8.19 and the policy text should refer specifically to DIRFT III.
- The respondent considers that the symbol on the diagram representing DIRFT is relocated to reflect the location of DIRFT III (west of the M1 and north of Junction 18) and that a plan is provided as part of the JCS which outlines the location and extent of the DIRFT III site as was agreed at the committee meeting of the Joint Strategic Planning Committee on the 31st January 2011.
- A respondent considers that paragraph 8.18 should be updated to take account of the DIRFT III proposals and reference should be made in the text and policy to the need to reconcile the proposals with the need to protect the natural and heritage assets in this area.
- A respondent considers the expansion of DIRFT should be supported. The respondent also considers that given the proximity of DIRFT to the village of Crick there are clearly significant benefits in terms of access to jobs. The respondent, therefore, considers Crick should accommodate additional housing growth. The respondent considers Policy R1 is silent on the availability of jobs when considering the sustainability of settlements and this represents a significant failing in the JCS and should be addressed.
- The respondent does not object to Policy E4 but considers that DIRFT will provide a limited number of jobs for West Northamptonshire residents due to accessibility. The respondent also considers the site is unattractive and

unsuitable for businesses that do not require access to rail facilities, consequently the allocation of other employment sites, such as M1 Junction 16 (Midway Park) will be required to meet the needs of business and to provide job opportunities for the residents of West Northamptonshire.

- A respondent welcomes the recognition of the importance of DIRFT as an economic driver but considers it should be recognised that it will not have a significant impact on employment levels within West Northamptonshire as it will generate a high level of in-commuting.
- The respondent considers paragraph 8.19 should acknowledge that any future proposals in and around DIRFT may necessitate cross boundary working with Rugby Borough Council and Warwickshire County Council.
- The respondent considers that Kilsby and Crick railway station should be reinstated to improve public transport use associated with DIRFT.
- Respondents express support for the policy approach.

Joint Planning Unit Response to Representations

Policy E4 and its supporting text considers the role and need for rail-related strategic distribution at DIRFT in line with national policy. DIRFT lies within the West Northamptonshire boundary being a significant employer in the area. Policy E4 and its supporting text already support further rail connected storage and distribution expansion at DIRFT in principal but cannot prejudge a decision on DIRFT 3 that will have to be taken by the Major Infrastructure Planning Unit. The floorspace to be provided at DIRFT 2 is correctly counted as part of the supply of warehouse and distribution for West Northamptonshire being within the boundaries of this area. Rugby Borough Council officers have given their support for this approach. The JPU have added a key diagram enlargement map to show Policy E4 more clearly as suggested. The JPU welcomes the general support for the thrust of the policy.

The number of jobs in Policy S7 is a minimum with an undertaking to add in job losses caused by the recession and review the policy if more jobs are created than expected.

The supporting text to Policy E4 sets out the wider context for DIRFT including its sphere of influence. However DIRFT is located within West Northamptonshire and accessible to the populations of Daventry and much of Northampton. DIRFT is more sustainable, than the suggested location at M1 Junction 16 (Midway Park) being rail related. More sustainable locations than Midway Park also exist elsewhere such as those in Northampton's existing urban area.

In response to general comments not covered in the response above:

- Policies on the protection of heritage are set out in Policy BN5;
- The reinstatement of the former Crick/ Kilsby railway station is not considered viable by the JPU or Northamptonshire County Council;
- Policy R1 deals with role of Crick in the settlement hierarchy including employment; and

- Rugby Borough Council officers consider Policy E4 to fit in with their adopted Core Strategy.

Recommended Action

That the supporting text, policy and proposals map be amended as set out in Proposed Changes:

PC010/E
PC011/E
PC012/E
PC002/MK

8.0 Economic Advantage

38. Policy E5 – Silverstone Circuit

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E5 – Silverstone Circuit	19	11	8	3	16	5	7	4	0

Summary of issues raised by Respondents

- The respondent considers cross-boundary impacts, including the setting of heritage assets need to be considered in the policy. The respondent considers the international importance of Stowe Park, in particular, landscape mitigation and archaeological investigations, should be referred to in the policy and accompanying text.
- The respondent considers that Policy E5 should be amended to indicate that development will take place in accordance with the agreed outcomes of the identified studies and any required mitigation.
- The respondent supports the policy approach but advises the Development Brief was approved in February 2009 and not January as stated.
- The respondent generally supports the policy approach but advises the entire bracketed text at bullet point one be removed as the entire technology park is within South Northamptonshire area.
- The respondent considers that the JCS cannot make allocations outside its area it can only support such provision.
- The respondents consider that it is necessary for the development at the Circuit to be supported by further housing growth associated with Silverstone village. In the respondents opinion failure to do this will simply promote large scale commuting to the Circuit which is wholly unsustainable and therefore in conflict with wider policies and objectives in the JCS.
- The respondent considers the strategic nature of the Circuit development requires clarification by inclusion of the word “strategic” before the word “employment” in the first sentence of the policy.
- The respondent considers the policy should include text referring to the need for functional links from the Circuit to the settlements of Towcester, Brackley and Silverstone, in particular by strengthening sustainable transport links, and by demonstrating that a sustainable balance would be achieved between economic and employment growth and provision of housing in these nearby and adjoining settlements.
- The respondent has no objection to the policy but considers that it will provide a limited number of jobs for West Northamptonshire residents. Consequently other employment sites, such as M1 Junction 16 (Midway Park) will be required to meet the needs of business and to provide job opportunities for the residents of West Northamptonshire.

- The respondent welcomes the recognition of the importance of Silverstone Circuit as an economic driver but considers it will not have a significant impact on employment levels within West Northamptonshire as it will generate a high level of in-commuting.
- The respondent considers Silverstone Circuit should be assessed later as part of a specific SPD/DPD paper.

Joint Planning Unit Response to Representations

Policy E5 and its supporting text consider the role and need for the expansion of Silverstone Circuit. The expansion has implications for the local and wider economy but impact most on Aylesbury Vale. Silverstone Circuit will create job opportunities for those living in Towcester and Brackley and much of South Northamptonshire as well as outside of West Northamptonshire in Aylesbury Vale. A Planning Brief for the expansion of the Circuit has been agreed by South Northamptonshire Council and Aylesbury Vale Council. The approach of Policy C5 is one of supporting the expansion of the Circuit in line with the Planning Brief. The JPU welcomes support for the approach from Aylesbury Vale Council. The JPU therefore consider cross-boundary issues have been addressed with support given for JCS proposals.

The JPU agree that Policy E5 be corrected to refer to Silverstone Advanced Technology Park as within the boundary of South Northamptonshire Council and to correct the date of the Development Brief. The Silverstone Circuit proposal was granted planning permission in 2012 by South Northamptonshire Council subject to a S106 agreement. In addition the JPU agree reference be made to the latest position for the University Technical College proposal at Silverstone.

In response to general comments not covered in the response above:

- Transport links from settlements to the Circuit are adequately set out in Policy T4;
- Policy E5 already mentions the need to take account of identified studies;
- The level of housing proposed in settlements is appropriate to balance jobs growth;
- Policies on the protection of heritage are set out in Policy BN5; and
- The wider role of Silverstone is explained in the JCS with the word “strategic” not required in Policy E5.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC013/E
 PC014/E
 PC015/E
 PC016/E
 PC017/E

8.0 Economic Advantage

39. Policy E6 – Education, Skills and Training

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E6 – Education, Skills and Training	2	2	0	1	1	1	0	0	0

Summary of issues raised by Respondents

- The respondent considers paragraph 8.31 should refer to Moulton College and Northampton College are referred to by name, rather than as ‘the Colleges’ as this will provide consistency with the rest of the document.
- The respondent considers Policy E6 should refer to support for new educational facilities on the existing campuses of the University of Northampton, Moulton College and Northampton College and other educational institutions and at other sites which are accessible by sustainable transport modes.
- The respondent question whether employment agreements providing positive discrimination in favour of the local workforce are lawful having regard to EU legislation and otherwise.
- The respondents express support for the policy approach.

Joint Planning Unit Response to Representations

The JCS aims to ensure the right skills are in place to support and enable residents to take advantage of new skilled jobs. Support for the approach in Policy E6 is noted.

The JPU consider the reference to “Colleges” is adequate.

Policy E6 adequately encourages new educational facilities. Specific education proposals are listed in the infrastructure schedule.

The policies in the JCS including Policy E6 have been subject to an equalities impact assessment.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC018/E
PC019/E

8.0 Economic Advantage

40. Policy E7 – Tourism, Visitor and Cultural Industries

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E7 – Tourism, Visitor and Cultural Industries	6	6	0	2	4	1	2	1	0

Summary of issues raised by Respondents

- The respondent considers a policy should be included to assist Northampton Saints Rugby Ground or the Northampton Cobblers Football Ground in providing facilities to a National Standard.
- The respondent considers that as ‘culture’ is covered in paragraph 7.25 in the Regenerating and Developing Communities section further mention is not required in the Economic Advantage chapter as the topic should be covered in one section.
- The respondent considers there is no evidence base to statements regarding increasing tourism.
- The respondent considers that to be consistent with national policy at PPS4 Policy R2 ought to state that Policy E7 applies in relation to tourism in rural areas and the reference to Policy R2 in Policy E7 should be removed.
- The respondent considers Policy S8 should cross refer to Policy E7; however the latter does not refer to the change of use of rural buildings to uses falling within the B use classes. The respondent considers Policy E7 should in line with PPS4 to refer to reuse of rural buildings.
- The respondent considers some definition of attractions and facilities of a ‘significant scale’ should be provided for clarity.
- Respondents express support for the policy approach.

Joint Planning Unit Response to Representations

The National Planning Policy Framework (NPPF) requires a town centre first approach to leisure and tourism provision in order to strengthen the role of centres. The JCS evidence base for tourism and leisure is provided by a range of organisations in Northamptonshire including the JPU, WNDC, the Borough and District Councils and Northamptonshire County Council. The evidence base for the JCS includes the following:

- The Cultural Mapping Report for West Northamptonshire 2008 and West Northamptonshire Cultural Investment Plan assesses culture, arts, and entertainment;

- The Sports Facilities Strategy for West Northamptonshire 2009 assesses the provision and need for sporting visitor attractions; and
- The Northampton Central Area Design Framework, Waterside Northampton and St John's Masterplans provide an assessment of leisure potential for land within and outside of the Northampton town centre.

These and other assessments found that leisure and hotel provision can be accommodated in the town centres and other identified areas. The Northampton Central Area Plan identifies specific sites for leisure and hotels. An evidence base for proposals such as Towcester Racecourse have been provided and approved as part of the planning application process. The above evidence base has informed JCS policy on leisure in and outside of town centres and across West Northamptonshire.

In response to general comments not covered in the response above:

- Culture is a significant employer in West Northamptonshire especially in Northampton town centre requiring reference in the employment section;
- A reference is already made to sports clubs in the Spatial Portrait section of the JCS;
- Policy E7 does not apply a sequential test to small scale rural leisure proposals in line with NPPF;
- The reuse of rural buildings is adequately covered in Policy R2; and
- Further detail on 'significant scale' is included in Policies R1 and R2.

Recommended Action

No change.

9.0 Housing

41. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	20	17	3	2	18	7	5	2	4

Summary of issues raised by Respondents

- Respondents focus on the content of the Strategic Housing Market Assessment (SHMA) and the Viability Appraisal. The key concerns raised are summarised below:
 - The targets recommended by the Viability Assessment for Daventry District are inconsistent with the affordable housing targets set out in Policy H2;
 - The Viability Assessment findings are challenged on the grounds that the baseline model is flawed and as a result the policy is unrealistic and unsound;
 - The requirements identified in the SHMA as set out in Table 4 of the JCS are unviable and should either be reduced or deleted; and
 - The SHMA findings are out of date e.g. they do not reflect changes in economic circumstances, and have not addressed the new affordable rent tenure.
- One of the respondents suggests the following minor wording changes:
 - Para 9.1 replace reference to development ‘around’ the main towns with ‘adjoining’; and
 - Para 9.6 add reference to registered providers preferring 2 bed units rather than 1-bed units because of the flexibility they provide.

Joint Planning Unit Response to Representations

The evidence base provided by the Strategic Housing Market Assessment (SHMA) has been updated in two respects. Firstly, the consultants ORS were commissioned to provide an update looking at the implications of affordable rent. The SHMA Affordable Rents update (August 2011) has been published as part of the evidence base. The update concluded that although affordable rent represents a change in tenure, these dwellings will still be used to meet the needs of households who require affordable housing. If allocation policies remain constant and households who cannot afford to meet the costs of Affordable Rent receive housing benefit to cover its costs then Affordable Rent will be the equivalent of social rent. This in turn implies that the findings of the October 2010 update of West Northamptonshire SHMA are still valid for the affordable housing requirements in the area.

Secondly, the SHMA model has been updated to accommodate the 2008 based household projections produced by ONS. In addition to the household projections other data within the model has also been updated including house prices and

income data. These updates address the issues raised by the representations and it is considered that the original SHMA report, together with the subsequent updates provide a comprehensive and robust evidence base to inform the housing policies within the JCS.

The SHMA meets the core output and process checklist requirements of Communities and Local Government's SHMA Practice Guidance. ORS, the consultants who produced the SHMA, have extensive experience of producing SHMAs across the country and the housing mix model has withstood scrutiny at numerous planning inquiries.

The criticisms levelled at the Viability Assessment have been fully considered and responded to by the consultants Three Dragons. The assumptions used in the baseline model were the subject of stakeholder consultation which included a workshop involving development industry representatives. The baseline model has been used to support policy development within other Core Strategies and has been tested through the public examination process. A further update of the Viability Assessment has been undertaken, principally to consider the impacts of more recent cost estimates relating to zero carbon homes and the implications of the new affordable rent tenure. The update has included an assessment of viability using a density of 35 dwellings per hectare as opposed to 45 dwellings per hectare used in the original study. This accords with the policy position in the JCS and also reflects recent market trends towards lower densities. The update also tests the viability of Sustainable Urban Extensions at a lower scale i.e. 1000 dwellings as opposed to 5000 dwellings in the original study. This is more representative of the nature of the SUEs included in the JCS. These changes address specific issues raised in the representations.

It should be understood that the Viability Assessment is strategic in nature and provides a technical evidence base to inform strategic policy. Viability varies over time and from site to site and this is recognised in the wording of policy within the JCS.

The text and table within this section of the JCS need to be revised to reflect the findings of the updated SHMA and Viability Appraisal.

The minor wording changes suggested to Paragraphs 9.1 and 9.6 are accepted as being appropriate.

Recommended Action

That the introductory text to the Housing Chapter be revised as set out in the following Proposed Changes:

- PC001/H
- PC002/H
- PC003/H
- PC004/H
- PC005/H
- PC006/H

9.0 Housing

42. Policy H1 - Housing Density and Mix

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H1 – Housing Density and Mix and Type of Dwellings	30	30	0	4	26	10	8	8	0

Summary of issues raised by Respondents

- Representations which challenge the soundness of this policy are exclusively from the development industry. Whilst there is support for the design led approach developers are objecting to the 35 dwelling minimum average residential density provision on the following grounds:
 - One size fits all approach is not justified;
 - Not consistent with national policy – i.e. the change to PPS3 removes national target for densities;
 - No justification in the evidence base for 35 dwellings per hectare. Reference is made to the Northampton Longer Term Growth Options Study and to the SHLAA which use different densities; and
 - The term ‘minimum average density’ is unclear and difficult to work out.
- The key change which is sought is the deletion of the 35 dph minimum average density.

Joint Planning Unit Response to Representations

It is recognised that the minimum national target for densities was removed from Planning Policy Statement 3: Housing and also does not appear within the National Planning Policy Framework (NPPF). However in the context of the expansion of the urban areas of West Northamptonshire, the effective and efficient use of land is still considered to be a valid local objective. The emphasis within the policy is on a design led approach to densities, but given the extensive nature of the Sustainable Urban Extensions (SUEs) a minimum average density is justified to ensure that these greenfield sites are used efficiently and to reduce the need to release further greenfield sites.

The characterisation work undertaken as part of the West Northamptonshire Development Corporation’s Manual for Design Codes demonstrates that the existing urban areas of Northampton, Daventry and Towcester support a number of different character areas which have been developed at a range of densities. The use of minimum average densities will enable the development of different character areas within each of the SUEs, with some areas being developed at densities below 35

dwellings per hectare and the potential for higher densities elsewhere. This approach provides flexibility to support high quality design, whilst ensuring efficient use of land and a sustainable pattern of development.

Amendments are required to Paragraph 9.10 of the explanatory text to delete the reference to national planning policy and to provide further explanation as to how minimum average densities should be calculated.

Recommended Action

That Paragraph 9.10 be amended as set out in the following Proposed Change:

PC007/H

9.0 Housing

43. Policy H2 – Affordable Housing

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H2 – Affordable Housing	34	34	0	9	25	10	8	6	1

Summary of issues raised by Respondents

- Representations which challenge the soundness of this policy are principally from the development industry challenging the percentage requirements for affordable housing both on the grounds of viability and evidence of need.
- Respondents challenge the Viability Assessment and the baseline model which was used on the following grounds:
 - Base model is not applicable to large sites as it assumes a 1ha site, 100% net to gross (i.e. no allowance for non developable land);
 - Assumed densities 35/40 dph have not been tested;
 - 15% developer profit is too low;
 - 12% allowance for other costs e.g. fees is too low;
 - Infrastructure costs are too low;
 - The modelling of a 5000 dwelling SUE is flawed as no SUEs in the JCS are this size;
 - The Code for Sustainable Homes cost assumptions are too low;
 - Further falls in land values/ house prices from the 2009 base data in the study; and
 - No account taken of affordable rent and the changes in HCA funding regimes.
- To a lesser extent respondents also challenge the SHMA on the following grounds:
 - It does not provide clear evidence of need for additional affordable housing;
 - The housing mix model is not consistent with CLG guidance; and
 - It does not consider affordable rent.
- One representation is challenging the thresholds suggesting that they should be 15 dwellings for both Daventry District and South Northamptonshire.
- The key change that is being sought by respondents is either the deletion of the percentage requirements for affordable housing or a reduction in the percentage that is sought.
- One representation proposes an alternative affordable housing requirement for South Northamptonshire of 35% and a site size threshold of 8 dwellings.

Joint Planning Unit Response to Representations

The evidence base provided by the Strategic Housing Market Assessment (SHMA) has been updated in two respects. Firstly, the consultants ORS were commissioned to provide an update looking at the implications of affordable rent. The SHMA Affordable Rents update (August 2011) has been published as part of the evidence base. The update concluded that although affordable rent represents a change in tenure, these dwellings will still be used to meet the needs of households who require affordable housing. If allocation policies remain constant and households who cannot afford to meet the costs of Affordable Rent receive housing benefit to cover its costs then Affordable Rent will be the equivalent of social rent. This in turn implies that the findings of the October 2010 update of West Northamptonshire SHMA are still valid for the affordable housing requirements in the area.

Secondly, the SHMA model has been updated to accommodate the 2008 based household projections produced by ONS. In addition to the household projections other data within the model has also been updated including house prices and income data. These updates address the issues raised by the representations and such that the original SHMA report, together with the subsequent updates provide a comprehensive and robust evidence base to inform the housing policies within the JCS.

It is considered that the SHMA meets the core output and process checklist requirements of Communities and Local Government's SHMA Practice Guidance. ORS, the consultants who produced the SHMA, have extensive experience of producing SHMAs across the country and the housing mix model has withstood scrutiny at numerous planning inquiries.

The criticisms levelled at the Viability Assessment have been fully considered and responded to by the consultants Three Dragons. The assumptions used in the baseline model were the subject of stakeholder consultation which included a workshop involving development industry representatives. The baseline model has been used to support policy development within other Core Strategies and has been tested through the public examination process. A further update of the Viability Assessment has been undertaken, principally to consider the impacts of more recent cost estimates relating to zero carbon homes and the implications of the new affordable rent tenure. The update has included an assessment of viability using a density of 35 dwellings per hectare as opposed to 45 dwellings per hectare used in the original study. This accords with the policy position in the JCS and also reflects recent market trends towards lower densities. The update also tests the viability of Sustainable Urban Extensions at a lower scale i.e. 1000 dwellings as opposed to 5000 dwellings in the original study. This is more representative of the nature of the SUEs included in the JCS. These changes address specific issues raised in the representations.

It should be understood that the Viability Assessment is strategic in nature and provides a technical evidence base to inform strategic policy. Viability varies over time and from site to site and this is recognised in the wording of policy within the JCS.

The lower site size thresholds proposed for Daventry and South Northamptonshire are justified by the relatively high contribution made by small sites within these areas as set out in the Viability Assessment.

The suggested deletion of the percentage requirements for affordable housing within the policy would be contrary to national policy. The reduction of the requirements suggested by respondents would fail to meet the needs for affordable housing identified in the SHMA.

Changes are required to both the supporting text and the policy itself to reflect the evidence provided by the SHMA and Viability Appraisal updates. These changes include split requirements for the urban and rural areas within Daventry and South Northamptonshire Districts having regard to the evidence of need and viability.

A full justification for these changes and an explanation of how they have been informed by the evidence base is set out in a separate technical paper.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC008/H
PC009/H
PC010/H
PC011/H

9.0 Housing

44. Policy H3 – Rural Exception Sites

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H3 – Rural Exception Sites	7	5	2	4	3	0	2	1	0

Summary of issues raised by Respondents

- One respondent considers that the first bullet point ‘within or adjoining the built up area’ is too restrictive and not within the spirit of PPS3.
- One respondent considers that the policy should include some reference to the need for community support for exception sites.
- One respondent considers that the final bullet point should refer to ‘people in local housing need’ rather than ‘local people in housing need’.

Joint Planning Unit Response to Representations

It is considered that the wording of the first bullet point is justified as it would be inappropriate for the policy to promote schemes which would be detached and isolated from existing settlements and potentially remote from services and facilities.

The importance of community engagement in seeking to meet housing needs in rural areas is accepted. This can be addressed by the inclusion of appropriate wording within the supporting text.

The proposed amendment to the final bullet point is accepted.

More extensive changes to the policy are now proposed in response to the provisions of the National Planning Policy Framework (NPPF) in particular the advice that local planning authorities should consider the role that market housing could play in delivering more affordable housing in rural areas.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Change:

PC012/H

9.0 Housing

45. Policy H4 – Specialised Accommodation

Summary of Representations

Policy/ Section	Total No of Reprs	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H4 – Specialised Accommodation	11	11	0	2	9	3	4	1	1

Summary of issues raised by Respondents

- Respondents raise the following concerns:
 - It is unclear how the needs will be identified and quantified;
 - It is unclear how the policy will be implemented and there is a concern that it could complicate and encumber delivery;
 - The omission if any reference to ‘live-work’ units is criticised; and
 - Concern that Paragraph 9.15 implies that the elderly will only be able to live on SUEs.

Joint Planning Unit Response to Representations

This policy recognises that the proportion of older people within the population of West Northamptonshire is growing and will continue to increase. It is important therefore that appropriate provision is made where proven need is identified. The policy is strategic in nature and does not seek to prescribe the exact form and scale of development. This will vary depending on evidence of need in particular locations and the nature of the site.

Scope exists to provide further guidance on the operation of the policy through other Local Plans such as the Northampton Related Development Area, supplementary guidance and master planning on individual sites.

‘Live – work’ units can be considered within the context of Policy H5 – Sustainable Housing in the Joint Core Strategy.

The policy does not apply exclusively to SUEs, but Paragraph 9.15 recognises that these sites are of a scale which provides the scope to meet a full range of housing needs.

A minor change is proposed to address the off-site provision of affordable accommodation where on site provision is not practicable.

A minor change is also required to the policy to correct a drafting error.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC013/H

PC014/H

9.0 Housing

46. Policy H5 – Sustainable Housing

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H5 – Sustainable Housing	175	174	1	1	174	86	86	2	0

Summary of issues raised by Respondents

- 158 of the representations are in the form of a standard response submitted by residents in the Wootton/ Hunsbury area and relate to a general criticism of the housing policies failure to deal with the needs of the elderly.
- Respondents raise strong objections to the requirement for ‘Lifetime Homes’ on the following grounds:
 - They are not necessary or desirable;
 - They are not justified by evidence e.g. viability assessment does not consider it;
 - They are unduly onerous and costly;
 - They will affect viability and delivery;
 - They should not encourage households to remain in the same home i.e. they should be encouraged to downsize; and
 - They are inconsistent with national policy – i.e. lifetime homes not mandatory until Level 6 of CSH.
- The changes sought by respondents include the deletion of the policy or an amendment to the policy whereby a proportion of lifetime homes would be provided subject to viability, or a policy to ‘encourage’ rather than ‘require’.

Joint Planning Unit Response to Representations

The inclusion of this policy within the JCS is supported by evidence within the SHMA. The SHMA recognises that the population of West Northamptonshire will become older and in particular the number of people aged 60 years and above will increase. The SHMA recommends that there should be more choice of housing available that is suited to older households and that design standards such as Lifetime Homes should be met.

Ensuring that housing is flexible and capable of meeting the changing needs of households is a key feature of sustainability. Lifetime Homes is a recognised national standard for building accessible and adaptable homes, and is widely used in development plan policies. Ensuring that new development meets this standard will increase the choice of homes suitable for older people and benefit other households such as those with disabilities, and families with young children.

The Communities and Local Government (2008) publication 'Lifetime Homes, Lifetime Neighbourhoods' estimates the additional cost of meeting the standard as being £547 per new home. As the costs are relatively modest it was considered that the impact on overall scheme viability would be marginal, and as such it was not included within the Viability Appraisal. Notwithstanding this it is accepted that some flexibility should be introduced into the policy as requested in representations, and a change is proposed to include a reference to scheme viability.

A further minor change is proposed to the supporting text to clarify that the policy applies to development falling within Class C3 of the Use Classes Order.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC015/H

PC016/H

9.0 Housing

47. Policy H6 – Existing Housing Stock

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H6 – Managing the Existing Housing Stock	2	2	0	1	1	1	0	0	0

Summary of issues raised by Respondents

- One respondent considers that the policy could unreasonably restrict the change of use of housing to other uses.

Joint Planning Unit Response to Representations

The policy recognises that the existing housing stock is an important resource and has an essential ongoing role in meeting the housing needs of the area. As such the policy seeks to ensure that existing dwellings are not lost to other uses unless there is a clear justification for the change of use.

Recommended Action

No changes are proposed.

9.0 Housing

48. Policy H7 – Gypsies, Travellers and Travelling Showpeople

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H7 – Gypsies, Travellers and Travelling Showpeople	13	13	0	3	10	4	4	2	0

Summary of issues raised by Respondents

- There are no objections to the wording of the policy itself.
- Some respondents are objecting to the reference in Paragraph 9.21 that gypsy sites could be included within the SUEs where they meet the criteria.
- A respondent expresses concern about reference to ‘fear of crime’ in Paragraph 9.25.

Joint Planning Unit Response to Representations

There is no reason why sites should not be provided within the proposed SUEs where they meet the criteria specified in the policy, and as such this in an option which should be considered in the relevant site allocation Local Plan.

The commonly expressed concerns relating to the ‘fear of crime’ is an example of why further work is required to engage effectively with both the settled and travelling communities.

No changes are required in response to the representations, but a number of changes are proposed in response to the national ‘Planning Policy for Traveller Sites’ published by Communities and Local Government in March 2012.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC017/H
PC018/H
PC019/H
PC020/H
PC021/H
PC022/H

10.0 Built and Natural Environment

49. Introduction

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	4	4	0	2	2	0	2	0	0

Summary of issues raised by Respondents

- Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.

Joint Planning Unit Response to Representations

Minor text changes are proposed to the introductory text to aid clarity and to reflect the wording of the National Planning Policy Framework.

Recommended Action

That the introductory text be amended as set out in Proposed Changes:

PC001/BN
PC002/BN
PC003/BN
PC004/BN
PC005/BN

10.0 Built and Natural Environment

50. Policy BN1 – Green Infrastructure Connections

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN1– Green Infrastructure Connections	15	11	4	7	8	2	4	0	2

Summary of issues raised by Respondents

- Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.

Joint Planning Unit Response to Representations

Minor text changes are proposed to the introductory text to aid clarity and to refer to a factual update. Text changes include a more detailed definition of Green Infrastructure. Minor changes to the policy text are proposed to aid clarity and comprehension.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC006/BN
PC007/BN
PC008/BN
PC009/BN

10.0 Built and Natural Environment

51. Policy BN2 – Biodiversity

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN2 – Biodiversity	7	7	0	5	2	0	1	1	0

Summary of issues raised by Respondents

- Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.

Joint Planning Unit Response to Representations

Text changes are proposed to the supporting paragraphs to the policy to improve clarity and to reflect the wording of Natural Environment White Paper, national Biodiversity Strategy, the need for climate change adaptation and to clarify the operation of the Wildlife and Countryside Act 1981 (as amended).

Proposed changes to the policy are suggested to the aid clarity of policy, clarify the approach to designations and confirm that compensatory measures will be required in cases of biodiversity loss.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC010/BN
PC011/BN
PC012/BN
PC013/BN
PC014/BN
PC015/BN

10.0 Built and Natural Environment

52. Policy BN3 – Woodland Enhancement and Creation

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN3 – Woodland Enhancement and Creation	4	4	0	3	1	0	0	1	0

Summary of issues raised by Respondents

- Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.

Joint Planning Unit Response to Representations

Proposed changes to the supporting text of the policy are suggested to provide for factual updates including changes to the documents included in the Local Development Scheme.

Proposed changes to the policy text are proposed to strengthen the policy on the management of woodland and provide greater protection in policy for ancient woodland and veteran trees outside ancient woodland.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC016/BN
PC017/BN

10.0 Built and Natural Environment

53. Policy BN4 – Upper Nene Valley Gravel Pits Potential Special Protection Area

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN4 – Upper Nene Valley Gravel Pits Potential Special Protection Area	4	4	0	2	2	2	0	0	0

Summary of issues raised by Respondents

- Respondents raise concerns about the proposed 900 m buffer zone in this location, arguing that there is little evidence to support this position. Instead, all these respondents propose that the policy be amended to include restrictions on building height or alternatively residential development in order to protect birds from predation.

Joint Planning Unit Response to Representations

The evidence base for the policy was discussed with Natural England and it was established that the 900m zone related to cat predation from residential development only.

The Appropriate Assessment raised the potential issue of bird sightlines and predation of protected bird species. Natural England agreed a methodology and new research has been carried out to determine bird sightlines from the site.

This evidence was used to develop a 250m zone around the site to the West and south where further assessment will be required to demonstrate that it will not have a significant adverse effect on bird's sightlines.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC018/BN
PC019/BN
PC020/BN
PC021/BN
PC022/BN
PC023/BN
PC024/BN

PC025/BN
PC026/BN
PC027/BN

10.0 Built and Natural Environment

54. Policy BN5 – The Historic Environment

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN5 – The Historic Environment	6	6	0	4	2	0	2	0	0

Summary of issues raised by Respondents

- Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.

Joint Planning Unit Response to Representations

Proposed changes to the supporting text of the policy are suggested to aid clarity and to reflect the NPPF as well as to provide factual updates.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC028/BN
PC029/BN
PC030/BN
PC031/BN
PC032/BN
PC033/BN

10.0 Built and Natural Environment

55. Policy BN6 – Weedon Depot

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN6 – Weedon Depot	9	9	0	7	2	1	1	0	0

Summary of issues raised by Respondents

- Respondents express in-principle support for the policy and there are no objections to the principle of the redevelopment of the site.
- A number of minor wording changes are proposed by these respondents which are summarised below:
 - Changes to the wording of the supporting text to reflect heritage significance of the site and factual changes regarding the ‘Heritage at Risk’ Register;
 - An alternative mix of uses is suggested which would include employment (B2 and B8), and exclude any residential use;
 - Supporting text should recognise that it is the combination of the individually listed buildings and structures, the spaces between them, their functional and historic connections and wider setting that contributes to the significance of the site as a whole;
 - Supporting text should ‘positively support’ or actively encourage’ rather than just ‘enable’ the re-use of the site;
 - A minor re-ordering of the policy wording; and
 - Reference in the policy to the setting of the individual buildings and structures and the asset as a whole.
- Respondents also propose a minor wording change to include a reference to the ‘identification and implementation of mitigation measures’ arising from the Transport Assessment.

Joint Planning Unit Response to Representations

The ‘in-principle’ support for the policy is noted and welcome.

The suggested minor wording changes are all acceptable, with the exception of the alternative mix of uses which is suggested. B2 and B8 employment uses would not be appropriate on this site having regard to the nature of the vehicular access and the proximity to residential areas.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC034/BN
PC035/BN
PC036/BN
PC037/BN
PC038/BN
PC039/BN
PC040/BN

10.0 Built and Natural Environment

56. Policy BN7 – Flood Risk

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN7 – Flood Risk	64	64	0	5	59	5	52	2	0

Summary of issues raised by Respondents

- There is significant opposition to this policy. Most representations consist of standard responses objecting to additional housing numbers in Northampton on the following grounds:
 - Excessive reliance was being placed on Sustainable Urban Drainage Systems to avoid the flood risk to the River Nene which could seriously affect the town; and
 - Figures for the overall flood risk provided by the Environment Agency for Northampton are currently being questioned, and their assessment of risk is potentially well below that suggested by other sources. Accordingly, the Northampton flood risk assessment needs to be confirmed as correct before the additional housing is approved.
- Respondents challenge the soundness of the policy on the grounds that there is currently insufficient evidence to justify it and that significant risks exist that need resolving before the policy can be deemed to be sound. The key issues raised in this respect are summarised below:
 - The Sustainability Appraisal does not currently reflect the potential significance of water quality issues and should be updated to consider the final Water Cycle Strategy (WCS). Furthermore, the weighting of water quality impacts as part of sustainable development decisions may need to be explored further;
 - The supporting paragraphs should consider water resource, water quality and flood risk in turn (rather than water quality included as part of water resource and flood risk discussions). The water quality section should reflect the conclusions and recommendations from the WCS, the requirements of Water Framework Directive and the implications to spatial planning decisions within West Northamptonshire;
 - To protect water quality and deliver growth simultaneously, the JCS may require a locally specific water quality policy set to ensure the JCS's growth in West Northamptonshire is delivered within environmental limits; and
 - The possibility that significant issues or risks could still remain (even once the above requirements have been satisfied).

Joint Planning Unit Response to Representations

The completion of the West Northamptonshire Water Cycle Study in September 2011 has strengthened an integrated approach to flood risk, water resources, water quality and wastewater infrastructure and provided site specific information and recommendations for further action building on the Strategic Flood Risk Assessment. This includes specific town based information on flood risk management, water quality and wastewater infrastructure and water supply. There are also larger than local recommendations and advice for water resources, flood risk water management and the in the choice, operation and adoption of Suds in the light of the new role of the County Council under the Flood and Water Management Act.

The Sustainability Appraisal Report is being updated to reflect and comment on the JCS in the light of the new evidence base.

To reflect the new evidence base a new policy (BN7a) concerning Water Supply, Quality and Wastewater Infrastructure is proposed which, with the existing Flood Risk policy, seeks to integrate water management policy, including the water aspects of the Code for Sustainable Homes level 4 for water conservation or any equivalent national standard.

Recommended Action

That the supporting text and policy be amended with the introduction of a new policy as set out in Proposed Changes:

PC041/BN
PC042/BN
PC043/BN
PC044/BN
PC045/BN
PC046/BN
PC047/BN
PC048/BN
PC049/BN
PC050/BN
PC051/BN
PC052/BN
PC053/BN
PC054/BN

10.0 Built and Natural Environment

57. Policy BN8 – The River Nene Strategic River Corridor

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN8 – The River Nene Strategic River Corridor	4	4	0	3	1	1	0	0	0

Summary of issues raised by Respondents

- Respondents support the policy in-principle. Minor changes to wording are proposed to further elaborate on the historical, ecological and recreational value of the canal network.

Joint Planning Unit Response to Representations

Support for the policy in principle is welcomed.

Reference to the river environment as an important resource for wildlife, leisure and recreation and the link to the area's past are made in supporting text to the policy. Further elaboration is not considered necessary to support the operation of the policy.

A minor change to the policy is proposed to aid clarity.

Recommended Action

That the policy be amended as set out in Proposed Changes:

PC055/BN

10.0 Built and Natural Environment

58. Policy BN9 – Planning for Pollution Control

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN9 – Planning for Pollution Control	17	17	0	6	11	3	6	2	0

Summary of issues raised by Respondents

- Respondents do not object to the policy itself. Instead, the policy is used to oppose planned development in the South and West of Northampton that would result in increased air pollution from traffic emissions and increase what is perceived to be already poor air quality in these areas.
- Respondents also propose wording changes to aid clarity and comprehension.

Joint Planning Unit Response to Representations

The overall aim of planning and pollution control policies is to ensure the sustainable and beneficial use of land. New development will be subject to appropriate controls in order to reduce their adverse effects and contain them within acceptable limits.

Proposed changes to the supporting text are provided to reflect factual updates and changes to national policy. Changes to the policy itself are suggested to aid clarity, strengthen the policy and include factual updates such as changes to the documents included in the Local Development Scheme.

Recommended Action

That the text and policy be amended as set out in Proposed Changes:

PC056/BN
PC057/BN
PC058/BN
PC059/BN
PC060/BN

10.0 Built and Natural Environment

59. Policy BN10 – Ground Instability

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN10 – Ground Instability	3	3	0	1	2	1	1	0	0

Summary of issues raised by Respondents

- No respondents directly object to the policy. A minor amendment is proposed that seeks to draw a connection between protecting water resources and ground stability.

Joint Planning Unit Response to Representations

Protecting water resources is dealt with in Policy BN7a.

Recommended Action

Response to issue raised by inclusion of policy BN7a. Minor change to supporting text is made to reflect changes to national policy.

PC060/BN

11.0 Infrastructure and Delivery

60. Introduction

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	106	104	2	3	103	11	91	1	0

Summary of issues raised by Respondents

- Respondents expressed a number of concerns regarding the level and timing of future infrastructure provision over the plan period, arguing that these would not be able to be provided in time to keep up with the projected development. Respondents submitted that current economic conditions suggest that projected building timescales are optimistic and should be reviewed and that Government and its Agencies should underwrite funding for essential infrastructure before development commences.
- Respondents raised specific concerns regarding the lack of evidence on the future infrastructure needs of Northampton General Hospital in line with expected growth and the insufficient evidence base to determine the level of investment required for education, water supply and sewerage and on the SUEs projected for North Northampton.
- Respondents also felt that the infrastructure schedule is incomplete as the source of funding is not secure and lacks evidence as to a realistic cost.
- A respondent also feels that that sufficient evidence has not yet been prepared in order to justify its support for proposed environmental infrastructure.
- The majority of representations were received in the form of a standard response. This raises concern about the amount of development that has already occurred during the plan-period without adequate infrastructure and raises a number of questions about future infrastructure provision for health, roads, utilities and education. Response concludes that all new developments in West Northamptonshire should be blocked and the JCS put on hold until the required improvements in infrastructure have been approved and fully financed.

Joint Planning Unit Response to Representations

The Proposed Changes to the Pre-Submission JCS update the information in relation to known infrastructure requirements and a new Appendix 4 Infrastructure Requirements to the JCS is included. This update provides detailed information in relation to the Key Primary Infrastructure Projects included at Table 7 of the Pre-Submission JCS. Appendix 4 is taken directly from the updated work in relation to the Infrastructure Delivery Plan Update 2012 (IDP). The IDP update 2012 has (as previous versions have) been reviewed in close consultation with infrastructure providers. The timing and cost of infrastructure delivery is also subject to

consultation with infrastructure providers and in relation to the anticipated delivery of housing as set out in the housing trajectory.

In some instances housing build out rates have been reviewed in the light of updated market information and this is set out in relation to specific SUE policies.

Funding has already been secured for a number of major infrastructure projects. For example, in May 2012 West Northamptonshire Development Corporation (WNDC) provided significant funding to deliver Northampton Castle railway station which will be supported by other partners including Northamptonshire County Council and Network Rail giving a total investment of £30m. WNDC and Northampton Borough Council have invested £10m in the new Northampton bus interchange project. The Government's Growing Places Fund allocated by Northamptonshire Enterprise Partnership has contributed almost £1m to secure the junction improvements at the A45/ A5 Weedon crossroads.

Acute healthcare provision is revenue funded by the Department of Health and delivered by NHS Trusts and the Clinical Commissioning Groups within the County. Providing acute healthcare infrastructure is beyond the control of the Partner Authorities and developers within West Northamptonshire. Northampton General Hospital NHS Trust has expressed concerns about adequately meeting future needs due to present uncertainties in Government funding provision.

Northampton General Hospital is the major acute healthcare hospital for Northampton, Daventry and South Northamptonshire. The hospital has developed incrementally over the years and has not resulted in the best use of the site, which impacts on the efficiency of service. It contains a number of single storey buildings and all car parking is at surface level. There are opportunities to improve the efficiency of the site however present uncertainties with healthcare funding make it difficult for the hospital to plan with any certainty over the longer period for holistic site improvements. The hospital has started the process of planning for the future use of its site and has developed a Strategic Masterplan. Smaller changes to hospital facilities are undertaken in-line with the overall Masterplan. There is a potential funding gap for acute services provision which is beyond the means of developers' contributions to influence. No information is available on how large any funding gap could be, but it is likely that Government funding would be needed in order to raise the funds needed.

Recommended Action

No further changes required.

11.0 Infrastructure and Delivery

61. Policy INF1 - Approach to Infrastructure Delivery

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy INF1 – Approach to Infrastructure Delivery	179	174	5	8	171	74	85	8	4

Summary of issues raised by Respondents

- A number of respondents wish to see the policy strengthened and/ or clarified and raise the following issues:
 - Respondents feel the JCS needs stronger recognition/ commitment to provide infrastructure alongside housing development and ensure it will have clear sources of funding, be sustainable and provided in a timely manner;
 - The word ‘should’ should be replaced with ‘will’ to strengthen the policy;
 - Respondents express concern about the apparent lack of detail relating to necessary infrastructure required to support the planned growth. First priority is for necessary infrastructure to be constructed prior to building of any of the planned homes, which must be built around the infrastructure, not other way round. It is questioned whether this can be achieved in reality, particularly with the likely disbanding of West Northamptonshire Development Corporation;
 - Current infrastructure needs should be addressed first, prior to the construction of further development;
 - Some respondents feel that the policy could be clearer about the work that has already been undertaken to identify infrastructure that is necessary to support development and how this is intended to be delivered;
 - Policy should be consistent with and refer to the CIL regulations. Specifically that any planning obligation must meet the three legal tests namely that infrastructure provision must be: necessary; directly related; and fairly and reasonably related in scale and kind;
 - There is a need for tough guidance on infrastructure provision within the JCS. Examples of specific concerns include the need for A45 Flore/ Weedon improvements;
 - The value of having infrastructure provision linked to development cannot be overstressed. Local Authorities must monitor and enforce S.106 where these form part of approval. Developers should be made to observe and complete their obligations;
 - A respondent feels that it is important for policies or their supporting text to acknowledge the principle that developers should only be liable for infrastructure which directly relates to their development;
 - Decisions about what infrastructure is required should be made by local authorities, not developers.

- A number of respondents have also highlighted where they feel key areas of infrastructure that the JCS does not make adequate provision for, as follows:
 - Rural area infrastructure improvements should include broadband speed provision for every rural household at a speed as fast as in the next town or better;
 - Healthcare provision: A respondent is concerned that there has been no specific reference to the need for investment in Acute Healthcare to meet the planned population growth;
 - School provision: It is argued that the provision of one new secondary school in Northampton is inadequate; and
 - A respondent feels that Water Infrastructure needs to be upgraded in order to serve proposed growth in West Northamptonshire. Evidence has not been produced that demonstrates whether revised discharge consents required to serve growth proposed within JCS are achievable with conventional technologies.

- Other representations focus in the deliverability of infrastructure as follows:
 - Some respondent's estimate that based on a partial assessment of the infrastructure costs listed, a cost of £31,000 would be need related to each home. Respondents consider that this is an unrealistically high cost for developers in what is likely to be difficult period for house builders.
 - Public sector funding is required, and the respondent feels it is likely to be much reduced on earlier years; and
 - Respondents feel that there needs to be a greater account of the short to medium term economic situation and its relationship to delivery of infrastructure and the stated natural growth needs;
 - One respondent considers that the JCS promises increased economic investment at Paragraph 11.6, but this is contradicted elsewhere in evidence base where experts have assessed the West Northamptonshire area and its associated employment market and admit there's an insatiable demand for warehouses; hardly qualifies as a source of "high tech jobs";
 - One respondent feels that there is no mention is made of how localism bill and associated changes to planning law and how they will affect and change Policy INF1 especially in regards to rural villages and their relationship to urban conurbations.

Joint Planning Unit Response to Representations

Policy INF1 is considered to be robust. It requires new development to be supported by physical, green and social infrastructure within an appropriate timescale. The policy is supported by specific infrastructure requirements as set out within the SUE polices and the Infrastructure Delivery Plan Update 2012. The IDP Update provides estimated costs of infrastructure and funding sources. The IDP is a supporting document to the JCS. Table 7 of the Infrastructure and Delivery section of the JCS identifies 12 Key Primary Infrastructure Projects which have the potential to delay development if not bought forward in a timely manner.

Funding has already been secured for a number of Key Primary Infrastructure projects. For example, in May 2012 the West Northamptonshire Development

Corporation (WNDC) provided significant funding to deliver Northampton Castle railway station which will be supported by other partners including Northamptonshire County Council and Network Rail giving a total investment of £30m. WNDC and Northampton Borough Council have invested £10m in the new Northampton bus interchange project. The Government's Growing Places Fund allocated by Northamptonshire Enterprise Partnership has contributed almost £1m to secure the junction improvements at the A45/ A5 Weedon crossroads. The improvements to Daventry Waste Water Treatment Works at Whilton are ahead of schedule and Anglian Water Services will complete the works in 2012.

The West Northamptonshire partners are seeking to introduce the Community Infrastructure Levy (CIL) following the adoption of the JCS. The CIL is a viability tested charge on most forms of new development. Unlike S106 planning obligations CIL monies can be used to help fund a wide range of infrastructure projects including strategic infrastructure not necessarily directly related to the development the CIL monies are accrued from. Section 106 planning obligations will still be relevant to infrastructure provision directly related to mitigating the impact of development but must be in compliance with CIL regulation 122 and paragraph 204 of the National Planning Policy Framework. This is fully explained in the text to the Infrastructure and Delivery section of the JCS and further clarified by Proposed Changes to the section.

Policy C1 titled Changing Behaviour and Achieving Modal Split, includes a Proposed Change to the policy by adding a requirement that new development across West Northamptonshire should be accessed by fibre to the premises technology enabling access to superfast broadband and speeds of at least 20 megabits per second. In addition the West Northamptonshire IDP Update 2012 includes further information on broadband delivery across Northamptonshire as a result of Northamptonshire County Council's proactive working with the communications industry and opportunities for Government funding.

Acute healthcare provision is revenue funded by the Department of Health and delivered by NHS Trusts and the Clinical Commissioning Groups within the County. Providing acute healthcare infrastructure is beyond the control of the Partner Authorities and developers within West Northamptonshire.

School provision across the four towns in West Northamptonshire has been the subject of close consultation with Northamptonshire County Council as the education provider. Provision for a new secondary school at Northampton and the consequent site provision is made within the JCS. The IDP also refers to the need for future secondary education provision by expansion at existing schools to be determined in the future dependent on delivery of housing growth.

Water infrastructure has been the subject of close consultation with Anglian Water Services and the Environment Agency.

The funding of infrastructure will be via a number of funding sources including public sector investment (including central Government funding for major and smaller projects), private sector development (including developer contributions to public sector projects) and the business plans of statutory undertakers. As Government

funding is restricted and developer contributions are potentially affected by diminished land value, funding strategic infrastructure will remain challenging in the short term. Nevertheless, evidence shows that Northamptonshire has shown some resilience to the economic downturn and is well placed to thrive as the national economy improves. Recent public funding investment in Northampton new bus interchange, Northampton Castle Station and the A45/A5 Weedon crossroads improvements demonstrate that public funding although hard fought is available for both large and small infrastructure projects.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC001/ID
PC002/ID
PC003/ID

11.0 Infrastructure and Delivery

62. Policy INF2 – Contributions to Infrastructure Requirements

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy INF2 – Contributions to Infrastructure Requirements	86	77	9	6	80	11	61	6	2

Summary of issues raised by Respondents

- A number of respondents raised similar issues to those summarised in Policy INF1 above, for example concerns regarding the provision of infrastructure ahead of housing rather than retrospectively. They also mention the unrealistically high cost for developers (The infrastructure costs equates to a cost per home of £28,159 they feel), and the principle that developers should only be liable for infrastructure which directly relates to their development.
- Representations also identify some specific items of infrastructure which should be addressed by the policy as follows:
 - Some respondents feel it is essential that schools are provided to service new communities around Northampton in conjunction with development and occupation of those areas;
 - Also some respondents feel that potential contributions to flood risk management infrastructure should be included;
 - Some feel that no commitment is given towards contributions to Northampton General Hospital; a facility that would inevitably be further overloaded by developments in question; and
 - Another respondent felt that the A43 improvements should be listed in Table 7.
- Many respondents focussed on the CIL regulations and the following key points are made:
 - The legal compliance and soundness of the policy is challenged on the grounds that it does not accord with CIL regulations and Circular 05/2005. In particular, the policy should recognise that any planning obligation will need to pass the statutory tests of CIL Regulation 122.
 - Confirmation is sought whether retail development is included in definition of commercial development and if CIL will be sought for development of this use;
 - Some respondents feel that the policy should be amended to refer to the need for the respective councils to assess the cost of infrastructure and seek an appropriate level of contribution from developers through the mechanism of the CIL. The policy gives the impression that pooling of developer

contributions via the S106 mechanism can still continue to provide a basis on which to raise contributions towards infrastructure; and

- Some consider that there does not appear to be any clarity in terms of determining how the choice between schemes that are development-specific and those where pooled contributions apply will be made.
- Respondents have suggested a number of detailed wording changes are proposed to the policy and supporting text concerning CIL.
- There is criticism from a respondent regarding the intention to produce an SPD to provide further guidance on developer contributions. PPS12 gives guidance on infrastructure planning and indicates that Core Strategies should identify strategic infrastructure requirements and give clear steer as regards to its delivery. This should not be delegated to an SPD. Specifying future documents can cause problems due to possible delays or future changes, and therefore it would be better not to refer to a future SPD.
- One respondent feels that there is no mention is made of how localism bill and associated changes to planning law and how they will affect and change Policy INF2 especially in regards to rural villages and their relationship to urban conurbations.

Joint Planning Unit Response to Representations

The funding of infrastructure will be via a number of funding sources including public sector investment (including central Government funding for major and smaller projects) private sector development (including developer contributions to public sector projects) and the business plans of statutory undertakers. Financial contributions from developers via S106 planning obligations are subject to CIL regulation 122 and paragraph 204 of the National Planning Policy Framework (NPPF). The West Northamptonshire partners are seeking to introduce the Community Infrastructure Levy (CIL) following the adoption of the JCS. The CIL is a viability tested charge on most forms of new development. Unlike S106 planning obligations CIL monies can be used to help fund a wide range of infrastructure projects including strategic infrastructure not necessarily directly related to the development the CIL monies are accrued from.

The provision of schools to support new development has been the subject of close consultation with Northamptonshire County Council as education provider. The IDP Update 2012 provided further supporting information on schools provision across the West Northamptonshire area.

The policy includes reference to necessary infrastructure requirements to support development and mitigate its impact. Infrastructure to mitigate any impact on flood risk falls within the policy.

Northampton General Hospital provides acute healthcare provision for the area. It is revenue funded by the Department of Health and delivered by NHS Trusts and the Clinical Commissioning Groups within the County. Providing acute healthcare infrastructure is beyond the control of the Partner Authorities and developers within West Northamptonshire. Northamptonshire NHS has confirmed that no upgrade to Northampton General Hospital is currently planned, and that no upgrade is

considered necessary as a result of the growth of West Northamptonshire. Northampton General Hospital has developed incrementally over the years and has not resulted in the best use of the site, which impacts on the efficiency of service. It contains a number of single storey buildings and all car parking is at surface level. There are opportunities to improve the efficiency of the site however present uncertainties with healthcare funding make it difficult for the hospital to plan with any certainty over the longer period for holistic site improvements. The hospital has started the process of planning for the future use of its site and has developed a Strategic Masterplan. Smaller changes to hospital facilities are undertaken in-line with the overall Masterplan. There is a potential funding gap for acute services provision which is beyond the means of developers' contributions to influence. No information is available on how large any funding gap could be, but it is likely that Government funding would be needed in order to raise the funds needed.

As originally identified in the IDP 2011 and carried forward to the IDP Update 2012 certain infrastructure provision is key to the delivery of the JCS and without it development could be at least delayed or at worst prevented. These items are identified as 'Key Primary Infrastructure Projects' and are projects that linked to more than one development. These 12 Key Primary Infrastructure Projects are identified in the JCS at Table 7 of the Infrastructure and Delivery section of the JCS. It is not considered that the A43 Towcester improvements fall within the parameters of a 'Key Primary Infrastructure Project' as identified above.

Since the responses to the Pre-Submission JCS were made the NPPF has superseded Circular 05/2005 and the West Northamptonshire partner authorities are actively moving forward to introduce the Community Infrastructure Levy (CIL) across the partner authority areas. Proposed Changes therefore update the information relating to the CIL within the section of the JCS. The level of CIL rates and the types of development they are applied will be determined through viability testing and an independent examination and not through the JCS planning process. The regulations allow for pooling of financial contributions via Section 106 planning obligations up to the limit of 5 to any one infrastructure project. The list of infrastructure projects or types of infrastructure to be funded by CIL will be determined by the partner authorities via their Regulation 123 lists.

The production of an SPD is considered appropriate in this context as it will enable more detailed guidance to be provided, particularly regarding CIL and offer greater certainty and consistency in approach for the development industry and local communities.

The JCS does identify key strategic infrastructure planning requirements and their delivery as identified at Table 7 and further supported through evidence base at the Infrastructure Delivery Plan.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC004/ID

PC005/ID
PC006/ID
PC007/ID
PC008/ID
PC009/ID
PC010/ID
PC011/ID
PC012/ID
PC013/ID
PC014/ID

11.0 Infrastructure and Delivery

63. Infrastructure Delivery Plan Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Infrastructure Delivery Plan Introductory Text	27	22	5	2	25	11	11	2	1

Summary of issues raised by Respondents

The following issues are raised by respondents in respect of Table 7 – Key Primary Infrastructure Projects:

- Objection is raised to the implication that the 'A45 Northampton - Daventry Corridor Improvements' are required solely as a result of the Daventry North East SUE;
- The current option for the A45 upgrade as single carriageway is inadequate to serve future development in Daventry;
- Clarification is sought regarding the Flore-Weedon Bypass and the A45/ A5 crossroads;
- A respondent feels that the A5 Towcester Relief Road should be identified as a Key Primary Infrastructure Project. Respondent feels the Towcester Transport Study demonstrates the need for a relief road;
- A respondent feels that it is unclear whether Table 7, together with supporting IDP and the supporting text between Paragraphs 11.30 - 11.39 is formally part of the JCS or is just for information in the context of Policy INF2. In the event that this is a policy requirement of the JCS, then, they feel, it needs to be subject to the tests of soundness;
- A respondent is concerned that Table 7 does not refer to the A45 Growth Management Strategy. The A45 Corridor Study demonstrates the need for this scheme to safeguard the A45 from the impact of committed and allocated development in the Northampton area;
- Northern Relief Road (Including the A428 and A5199). This road should pass to the north, rather than the south of Harlestone Firs. Completion, the respondent feels, should also be linked to the development of the North of Whitehills SUE;
- Respondent feels that further information is required to prove that the Northern Relief Road is deliverable, including when and by whom the Relief Road will be funded and constructed;

Objections are raised in relation to the Northern Relief Road in relation to:

- The inconsistent terminology used for the Northern Relief Road/ North West Bypass;
- The delivery of the road not being viable; and

- The obligation requiring the completion of the Northern Relief Road within the first 3 years of initial dwelling completions at Kings Heath SUE.
- Some respondents refer to enhanced utilities provision, as well as a responsibility of the statutory undertakers and should not be a planning policy requirement. Elevating such matters to a policy requirement, they feel, may serve only to inflate costs, reducing the overall viability of a scheme and reducing funds available for S106 items;
- The Sandy Lane Improvements North is already completed; and
- Clarification is sought by some respondents regarding capacity at Whilton Waste Water Treatment Works.

A number of representations challenge the soundness of the IDP as follows:

- There is uncertainty about the need, costs, funding sources and delivery mechanisms for the key infrastructure projects identified;
- The obligations sought are unlikely to satisfy the tests set out in Regulation 122 of the CIL Regulations 2010;
- The respondent feels that Paragraph 11.34 and Table 7 should be amended to say that the list of 'key infrastructure projects' is indicative and each development will be considered on its own merits, flexibly, in line with the aims of paragraph 11.36;
- The methodology used to create infrastructure costs in the IDP and the omission of necessary key transport infrastructure such as the A43 Moulton - Broughton improvement as part of the A43 Northampton to Kettering strategic corridor improvement are material factors in determining the soundness of the plan; and
- The respondent feels that the IDP is merely an infrastructure 'wish list' with numerous omissions with flawed cost projections that ignore 'best practice'.

Joint Planning Unit Response to Representations

In respect of Table 7 of the Pre-Submission JCS which identifies Key Primary Infrastructure Projects the Proposed Changes clarify the following:

- The 'A45 Northampton - Daventry Corridor Improvements' are not required solely as a result of the Daventry North East SUE, and
- The A45 Growth Management Strategy is a Key Primary Infrastructure Project.

Table 7 is supplemented by further information as the Infrastructure Delivery Plan from which Table 7 is derived has been updated. Table 7 and appendix 4, as revised and updated via the Proposed Changes, is part of the JCS and therefore subject to the tests of soundness. The text is not however, policy text and does not therefore carry the same weight. Inevitably information about infrastructure requirements and delivery may be subject to change over time. For example, the Whilton Waste Water Treatment Works improvements are being delivered ahead of schedule and will be completed before the JCS is adopted.

Highway improvements are needed to the A45 corridor between Daventry and Junction 16 of the M1 to enable the expansion of Daventry to be completed. Improvements to the existing A45/ A5 Weedon junction will form a key proposal for

the early stages of development, and the M1 Junction 16 to Daventry A45 Link Road, known as the Daventry Development Link, will provide the opportunity to enable development in the longer term.

The A5 Towcester Relief Road is a requirement of a single development, the Towcester South SUE. As such it is to be provided and funded by the developer as development mitigation. Table 7 Key Primary Infrastructure Projects are necessary to support multiple development proposals.

A North West Bypass for Northampton will be required within the JCS plan period. The section from the A428 to Grange Farm (North West Bypass, Phase 1) will be required as part of the Northampton Kings Heath SUE and is likely to be commenced around 2016. Phase 2 of the North West Bypass (between Grange Farm and A5199) will be required to be delivered by 2026 with a possible commencement date at around 2021. The North West Bypass is required to serve the Sustainable Urban Extensions of North of Whitehills, King's Heath and Northampton West. Phase 1 of the North West Bypass will link in to the Sandy Lane Improvement North which runs from the A428 to Roman Road/ Berrywood Road and which has already been built. A new section of road to the south of the Sandy Lane Improvement North is known as the Sandy Lane Relief Road (between Roman Road and the A4500). A southern part of this is built and the remaining part will be brought forward by the Norwood Farm/ Upton Lodge development at around 2016. The Sandy Lane Relief Road and Northampton North West Bypass between them will complete an orbital route around the western side of Northampton, giving access to the A45, A43, M1 and to SUEs to the north-west and west of the town.

The Proposed Changes ensure consistent wording by reference to the North West Bypass and the delivery timings of phases of the road.

As regards utilities provision, as already referred to, Whilton Waste Water Treatment Works will be completed by 2012 and will provide capacity for the new development proposed. It is accepted that the Sandy Lane Improvement North is already completed.

In the development of the Infrastructure Delivery Plan and the identification of Key Primary Infrastructure Projects close liaison with infrastructure providers was maintained. For required strategic upgrades utilities providers are then able to factor these required upgrades into their annual monitoring plans in order to determine required funding. The Water Cycle Strategy for West Northamptonshire concludes that Anglian Water Services, through their existing strategic infrastructure and resource planning, have planned for a number of capital schemes that will support the proposed growth within the West Northamptonshire area until 2035.

Recommended Action

That the supporting text and table 7 be amended as set out in the following Proposed Changes:

PC015/ID

PC016/ID

PC017/ID
PC018/ID
PC019/ID
PC020/ID
PC021/ID
PC022/ID
PC023/ID
PC024/ID
PC025/ID
PC026/ID
PC027/ID
PC028/ID
PC029/ID
PC030/ID

Places Policies

64. Introductory Text to Places Policies

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Places Policies	0	0	0	0	0	0	0	0	0

Summary of issues raised by Respondents

- No representations received.

Joint Planning Unit Response to Representations

No response required.

Recommended Action

None

12.0 Northampton

65. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	6	6	0	0	6	3	2	1	0

Summary of issues raised by Respondents

- A respondent considers further reference should be made to the importance of the historic environment of Northampton town centre to better link the evidence base with respect to the identification of heritage assets in this area and the plan.

Joint Planning Unit Response to Representations

The JPU agrees with the respondent that the further reference could be made in the introductory text to highlight the importance of the historic environment of the town centre. However there is also a need to ensure the plan text is not over-long and as such there is a limit to the extent to which supporting text of this nature can be included. The Northampton Central Area Action Plan provides detailed policy consideration of the town centre and its historic attributes.

Recommended Action

That the introductory text to the Northampton Chapter be revised as set out in the following Proposed Changes:

PC001/N
PC002/N

12.0 Northampton

66. Policy N1 – The Regeneration of Northampton

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N1 – The Regeneration of Northampton	65	65	0	7	58	5	52	1	0

Summary of issues raised by Respondents

48 of the responses are standard responses related to concern that there is a lack of hospital provision related to growth. Other respondents comment that infrastructure needs and funding are insufficiently understood and highway connections such as the A45, A508 and A4500 are already congested.

One respondent considers that the regeneration of Northampton should be supported by the allocation of a strategic employment site at Houghton Gate and the allocation referred to in the policy text.

Other responses relate to retail provision including the following issues:-

- A full appraisal of the existing network of shopping provision has not been undertaken and the immediate shortfall in retail floorspace is not addressed.
- Local shopping within the SUEs, the words "of an appropriate scale" should be inserted after "...shopping, services and facilities."
- The respondent considers that restricting proposals for retail development in town centres and SUEs fails to take account of existing need in existing housing areas.
- The JCS over-estimates the town as a regional centre (it is not competitive with Milton Keynes) and under-estimates the connection of the town with the historic nature of its wider surroundings.

The following minor wording changes are suggested:

- The respondent considers that after 'heritage attributes' the words 'and historic character' should be added.
- A respondent feels an additional bullet point is required to read 'support improvements to the transport network to improve connectivity, safety and journey reliability'.

Joint Planning Unit Response to Representations

The majority of responses to this policy refer to concern that there is a lack of hospital provision related to growth. Acute healthcare provision is revenue funded by

the Department of Health and delivered by NHS Trusts and the Clinical Commissioning Groups within the County. Providing acute healthcare infrastructure is beyond the control of the Partner Authorities and developers within West Northamptonshire.

Northampton General Hospital is the major acute healthcare hospital for Northampton, Daventry and South Northamptonshire. Northampton General Hospital NHS Trust has expressed concerns in adequately meeting future needs due to present uncertainty in Government funding provision. Northampton General Hospital has developed incrementally over the years and the incremental form of development has not resulted in the best use of the site, which impacts on the efficiency of service. It contains a number of single storey buildings and all car parking is at surface level. There are opportunities to improve the efficiency of the site, however present uncertainties with healthcare funding make it difficult for the hospital to plan with any certainty over the longer period for holistic site improvements. The hospital has started the process of planning for the future use of its site and has developed a Strategic Masterplan. Smaller changes to hospital facilities are undertaken in-line with the overall Masterplan. There is a potential funding gap for acute services provision which is beyond the means of developers' contributions to influence. No information is available on how large any funding gap could be, but it is likely that Government funding would be needed in order to raise the funds needed.

The JPU in conjunction with NCC have produced a Transport Options Technical Paper on sustainable patterns of development and solutions to a deliverable transport strategy to accommodate the transport requirements of development.

A new strategic employment site at Houghton Gate, Northampton is not required to meet needs and is likely to adversely compete with more sustainably located and available employment land including derelict land in the SEMLEP Northampton Waterside Enterprise Zone on the edge of Northampton town centre.

The retail policies of the plan have been updated in relation to a further retail study update 2012 which has reassessed retail capacity in the light of changing parameters, including reduced expenditure forecasting due to the extent of the economic issues facing the retail industry. This update also took into account retail commitments at Northampton which had been achieved since the earlier 2011 retail study. The 2012 update advises that for Northampton a quantitative capacity for an additional convenience goods (grocery) floorspace of 7,800sqm (net) exists to 2026 with almost 3,000sqm of this required by 2016. The JCS seeks to allocate about 3,000sqm of this convenience retailing to the town centre. The Retail Study evidence base indicates that there are no quantitative convenience retailing gaps at Northampton outside the town centre. Policy S9 Distribution of Retail Development directs convenience retailing via a sequential approach to district and local centres and via Policy N11 to new local centres within SUEs at an appropriate scale.

The JPU has commissioned a study of existing retail centres which were assessed against the definition of centres provided in PPS4.

The suggested minor wording changes are accepted by the JPU as opportunities to clarify the policy content and direction. Reference to protecting heritage assets and historic character through managed change is proposed to be added to Policy N1 at its first bullet point. In addition it is proposed to add reference to the improvement of connectivity, safety and journey reliability to the final bullet point.

Recommended Action

That the supporting text and policy be revised as set out in the following Proposed Changes:

PC003/N

PC004/N

PC005/N

12.0 Northampton

67. Policy N2 – Northampton Central Area

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N2 – Northampton Central Area	24	24	0	4	20	7	7	6	0

Summary of issues raised by Respondents

- The respondent considers the final sentence of Paragraph 12.18 relating to restricting comparison retailing outside the town centre is unsound and should be deleted.
- The respondent considers that the justification for additional convenience floorspace within the town centre is not robust. The respondent considers there is an immediate need for retail floorspace that will and will not be satisfied by the proposed convenience shopping development for the town centre and the SUEs. The respondent considers the opportunity must be given to examine the approach of the JCS as the evidence base to support the shopping hierarchy is deficient and inadequately justified.
- The respondent considers that the second bullet point of Policy N2 should be replaced with “3,000sqm convenience (food) shopping floorspace for the period 2010 to 2026 within the periphery of the central area; and”.
- A respondent considers additional text is required in the JCS to refer to the opportunity for convenience goods retailing in the Central Area and suggest an increase in the convenience floorspace from 3,000sqm to 8,000sqm. The respondent also considers figures should be clarified as being net.
- The respondent strongly supports the policy approach and Paragraph 12.18 however, they consider a stand-alone policy to support the redevelopment of the Grosvenor Centre as a strategic site should be included.
- The respondent considers the 45,000sqm of comparison floorspace (2010-2021) for the town centre is different to that in the CAAP.
- A respondent considers additional wording is required at the end of the first sentence of the second paragraph to read ‘...on sites identified within the Central Area Action Plan.’
- The respondent considers that the policy should be rewritten to make clear that financial services are appropriate in designated shopping frontages.
- The respondent considers that the level of detail in the policy is premature as the CAAP is not at an advanced stage. The policy should be more generalised until the CAAP is adopted and floorspace figures removed.
- The respondent considers there is a need to emphasise the county town status and the importance of focusing on redevelopment.
- The respondent considers that appropriate Flood Risk Management and the opportunities for betterment should be included within Policy N2

- The respondent considers the provision of infrastructure and its funding lacks clarity.

Joint Planning Unit Response to Representations

The wording in Paragraph 12.18 of the JCS is proposed to be changed to the careful assessment of comparison retailing outside the town centre against the policy requirements of the National Planning Policy Framework (NPPF).

The West Northamptonshire Retail Study Update 2011 and the retail capacity refresh of 2012 advises that Northampton town centre is in need of further convenience retailing presence. The proposed wording of the policy requires that further town centre convenience retailing floorspace should be in the region of 3,000sqm, the size of a medium sized to large store. This is identified in the retail evidence base. There remains further retail headroom to provide for convenience retailing over and above the town centre convenience retailing quantum suggested. The West Northamptonshire Retail Study Update 2011 advises that new convenience retail provision should be linked to areas of housing growth. The Policy approach provided by the JCS is consistent in its sequential approach with the NPPF which requires a town centre first approach.

The Borough Council has consented a number of convenience retail applications since the 2011 Retail Study was published including an extension the Sainsbury store at Sixfields, the Tesco Extra Store at Mereway and other smaller consents including a new Aldi and Tesco Metro at Wellingborough Road, and an extension to a former Netto at Far Cotton.

The shopping hierarchy as identified in the JCS is based on the definition of district and local centres as described in the now withdrawn Planning Policy Statement 4 and the assessment process provided by the West Northamptonshire Retail Study Update 2011.

The JCS supports the provision of the Grosvenor Centre and its allocation is made within the Northampton Central Area Action Plan (NCAAP).

The floorspace capacity (headroom) figures differ between the JCS and the NCAAP as the JCS figures were provided as net whereas the NCAAP figures were provided as gross. The expression figures in the NCAAP are now provided as net.

The Proposed Changes to the Pre-Submission JCS add reference to sites identified within the Central Area Action Plan as requested.

The appropriate representation of financial services within designated shopping frontages is a detailed matter that goes beyond the strategic view of the JCS and is a matter for development management policies in other local plans.

The Proposed Changes seek to introduce some flexibility in the provision of floorspace figures as indicated in the NPPF. However, it is not considered premature to provide an indication of floorspace requirements as these link closely

with the NCAAP and the evidence base that supports the detailed delivery of sites within the Central Area Action Plan.

The County town status of Northampton and the focus on its regeneration is emphasised throughout the plan.

The Proposed Changes add reference to appropriate flood risk management solutions to deliver a reduction in flood risk wherever possible.

Appendix 4 to the JCS which is drawn from the West Northamptonshire Infrastructure Delivery Plan has been updated in close consultation with infrastructure providers. Funding sources have been identified where ever possible.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC006/N

PC007/N

12.0 Northampton

68. Policy N3 – Northampton North SUE

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N3 – Northampton North Sustainable Urban Extension	48	43	5	7	41	15	18	8	0

Summary of issues raised by Respondents

- The respondent considers statements on transport infrastructure needs would be clearer if they were prefixed by “The development should mitigate its impact on the transport network through measures including:”
- A respondent considers that the challenge of delivering Park and Ride for Northampton, even on the busiest corridors, by 2026 is sufficient to make most of the allocated Park and Ride sites unlikely to be brought forward within the plan period. The respondent considers the only one that is believed to have potential is the site associated with the A43 at Northampton North SUE as this is the busiest of the northern approaches to the town centre, and there is an opportunity to combine Park and Ride with a new bus service to the development, in a way that will not be possible at other sites. The respondent considers, with the exception of Northampton North, Park and Ride sites should be deleted from the plan.
- The respondent considers greater clarity is required on the need for and the approach to the delivery of the A45 Northampton Growth Management Strategy. This could be achieved through referring specifically to the need for SUE development to contribute towards the provision of strategic infrastructure.
- The respondent considers that brownfield land should be developed first. The respondent also considers development should not be concentrated around a single place as infrastructure will not cope, the environment will suffer and Park and Ride is not a sufficient solution to the transport problems.

Policy N3: Northampton North SUE

- The respondent supports the allocation but considers the policy should be amended by;
 - Deletion of reference to Park and Ride;
 - Greater flexibility for Primary school provision;
 - Flexibility of the quantum of the Technology Realm;
 - Deletion of reference to health care and library provision; and
 - Review of the retail limit as contrary to PPS4.

- A respondent considers the floorspace limit for retail convenience store should be deleted.
- A respondent considers the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace to be in the town centre and SUEs.
- A respondent considers that reference to local centre and floorspace limit should be removed.
- The respondent considers Northampton North SUE should be reduced to the southern portion of the site only with a capacity of 1,000 dwellings and the remaining quantum of development relocated to an allocation at Northampton North of Holly Lodge Drive SUE which the respondent considers is a more sustainable site.
- The respondent considers the SUE should revert to at least 5,660 dwellings.
- The respondent proposes a 20 acre (200 dwelling) site adjoining the Sandy Hill at Moulton as an additional allocation for the JCS.
- A respondent considers Northampton North is unjustifiably allocated and development should be spread along the northern fringe in a more sensitive manner as per Option 3 of the Northampton Longer Term Growth Options Study to include a small site at Boughton Green Road (with consent for hotel) which is deliverable available and achievable.
- The respondent considers Policy N3 should be amended to include reference to an appropriate package of infrastructure including a link from the A43 towards Holcot, and that specific reference should be made within the Policy to the Park and Ride serving local employers such as Moulton College and the University of Northampton
- The respondent queries the deliverability of the site given the identified infrastructure burden. The respondent also has concerns regarding coalescence with Overstone.
- The respondent considers the housing provision at Northampton North should be increased to at least 4,500 dwellings to 2026 with a further post 2026 requirement to at least 5,400 dwellings with consequent deletion of SUEs at Northampton West and Northampton South.
- The respondent considers additional wording should be added to the policy to require the development to mitigate its impact on the transport network. The respondent also considers a 3ha site for Park and Ride is excessive and reference to a bus service for the P&R should be included in the policy wording.
- The respondent considers that the allocation should be strictly limited to 2,000 dwellings within the red line site, that traffic problems should not be further exacerbated and that the setting of Pytchley Gates and views of Overstone Park should be protected.
- The respondent comments that Paragraph 12.27 suggests the Technology Realm location is shown on Inset Map 5 when it is not.
- A respondent expressed concern regarding the viability of the SUE against infrastructure funding. They considers a comprehensive solution for the improvement of the A43 between Northampton and Kettering to be essential in resolving issues of traffic congestion and improving connectivity along this strategic transport corridor. They further consider the extent and location of the proposed development at Northampton North should be reviewed in order to avoid coalescence and ensure adequate protection of the setting and character

of Overstone and Overstone Park. Respondent considers that the scale of the proposed structural greenspace is insufficient to adequately prevent the erosion of the setting and character of Overstone and Overstone Park.

- The respondent considers reference should be made to the inclusions of Flood Zones 2 and 3 within the discussion on Northampton North SUE.
- The respondent considers that the policy should refer to "flood risk management schemes" rather than "flood attenuation".
- Respondents offer general comments, these are; -
 - Development will lead to local traffic congestion;
 - The area is of landscape importance;
 - Gas pipes and power lines dissect the site;
 - Will the water supply and waste water system cope?
 - There will be significant disruption for existing residents;
 - There is potential for the area to flood from Overstone Lake;
 - There will be an impact on protected birds;
 - Agricultural land is needed for food production;
 - Property will be devalued locally;
 - Increased noise and chemical pollution;
 - Assurance is needed that services and facilities will be provided;
 - What is the cost of the development?
 - Dualling of the A43 Moulton Bypass should be linked to this SUE;
 - Development should respect the rural character of Moulton and Overstone;
 - Development should be spread between the other SUEs as the site is unsustainable;
 - Northampton North is not 3.5km from the centre of Northampton;
 - The inset map is incomplete;
 - Billing Brook watercourse should be correctly described;
 - The Inset map should show the location of the Technology Realm;
 - The Technology Realm will not be delivered;
 - A comprehensive highway study is required together with evidence to show the Park and Ride is economically viable;
 - Highway infrastructure identified is insufficient and the costing for it is too low;
 - The development is not viable due to infrastructure costs; and
 - The area is not all arable land as described in para. 12.22.
- Respondents support the allocation.

Joint Planning Unit Response to Representations

Support for the allocation is welcomed.

Highway mitigation at a strategic level is specified within the policy however the detailed extent of highway mitigation (e.g. the specification of minor junction improvements) and traffic calming through villages will be informed by detailed transport assessments as required by Policy C2, New Developments, in the JCS. The development will be required to mitigate its traffic impact on the local road network. The wording change suggested regarding mitigation of impact on the

transport network is proposed to be incorporated into Policy C2 and does not need to be repeated in each of the SUE policies.

There is no transport evidence to suggest that a link from the A43 towards Holcot would be required highway infrastructure to support the development of the SUE.

The development of the SUE requires a solution to congestion on the A43 and in particular the capacity of the A43 between Round Spinney Roundabout and Overstone Lane. Northamptonshire County Council (NCC) as local highway authority is supportive of an improvement to the strategic corridor link between Kettering and Northampton. Whilst the improvement of the strategic link is not a requirement of the SUE development, the development could accommodate NCC's aspiration.

The North West Bypass will be delivered in phases and supported via a number of developer contributions. Highway mitigation at a strategic level is specified within the policy.

In accordance with the respondents submission Park and Ride sites are proposed to be deleted from the JCS. The Northampton North SUE is indicated by NCC as having potential for Park and Ride however it is accepted that conventional Park and Ride will not be viable at Northampton North SUE. Proposed Changes to the Northampton North SUE provide for a Local Multi Modal Interchange co-located with a local centre providing a high quality bus service with services to the town centre and Moulton together with car and cycle parking provision.

The Northampton Growth Management Scheme (NGMS) for the M1/A45 sets out necessary mitigation measures on the A45 between M1 Junction 15 and Great Billing Junction required to support the growth of Northampton. The WNJPU and partners have agreed a Memorandum of Understanding (MoU) with the Highways Agency (HA) on the delivery of NGMS. The MoU provides a mechanism for using S106 planning obligations (prior to the introduction of CIL and then CIL funding) to secure contributions to enable delivery of the NGMS. The specific developer funded measures on the A45 and A43 are set out in the Transport Infrastructure Schedule. The MOU provides a mechanism for the flexible delivery of the NGMS including staging of contributions and use of S106s rather than Grampian Conditions. NCC has agreed to provide a "banker role" to enable developers to enter into S106 agreements. The NGMS MOU (at Paragraph 3.4 of that document) states that NGMS works will be coordinated between the HA and NCC through agreements under the 1980 Highways Act as necessary.

The JCS provides for and accounts for brownfield development, however the housing requirement cannot all be accommodated on brownfield sites hence greenfield allocations are required. In order to deliver the scale of development required a mix of greenfield and brownfield development needs to take place at the same time.

The Proposed Changes remove the specification within the policy text for two primary schools to be delivered as consultation with NCC as education provider allow for a single school provision. However, the Proposed Changes allow for

flexibility in the form of provision provided the needs of the development for primary school education are covered.

The Technology Realm location at Northampton North SUE is based on linkages with education primarily the University of Northampton however the University has announced its intention to move to central Northampton. In addition, since the Pre-Submission JCS was prepared an enterprise zone has been announced in central Northampton. It is crucial that synergy exists between economic initiatives. Northamptonshire Enterprise Partnership (NEP) and South East Midlands Local Enterprise Partnership (SEMLEP) agree that a elements of the Technology Realm approach are worthy of retention but that the revised Technology Realm framework is more viable and sustainable within the SEMLEP Northampton Waterside Enterprise Zone. The delivery of the Technology Realm will be supported by NEP and SEMLEP while viability will benefit from the subsidies attached to the Enterprise Zone. Employment provision is still to be made at the SUE but for local employment provision.

The reference to health care is retained within the policy provision as there is insufficient capacity locally at existing health centres to provide for primary health care for new residents associated with the development. Specific reference to library provision as a part of the development delivery is deleted as Library Services are consolidating existing services. However this would not preclude a library provision within a multi-use community building within the site.

As regards retail provision it is accepted that some flexibility should be introduced in this respect. The Proposed Changes delete the convenience floorspace limit but require new retail provision to be of an appropriate scale. Policy S9 Distribution of Retail Development of the JCS requires an impact assessment for proposals over 1,000sqm gross floorspace.

The Northampton North SUE a mixed use development of 2,000 dwellings, is a deliverable and sustainable site. It can bring with it a scale of infrastructure provision to support the development. Areas along the northern fringe of Northampton (including Holly Lodge Drive) were subject to sustainability appraisal at the Issues and Options stage of the JCS as Option 3 and had emerged from the Northampton Longer Term Growth Options Study. This sporadic linear type development was considered to be less sustainable than the area now allocated.

The enlargement of the Northampton North SUE back to its Emergent JCS scale at over 5,000 dwellings is not considered the most sustainable option for Northampton set against the reduced quantum of housing growth now proposed to be delivered within the plan period as set out in the Pre-Submission JCS. A development of over 5,000 dwellings at Northampton North would focus a significant proportion of development requirements in one location. To deliver a development of this scale within the plan period would require significant infrastructure and multiple housing starts in a local area for which marketability might then be depressed. The deliverability of such a scheme in the present economic climate is at best uncertain.

The SUE is proposed for 2,000 dwellings however Proposed Changes insert the words “in the region of 2,000 dwellings”. This allows the detailed masterplanning and design work to respond appropriately to site context.

The proposed addition to the SUE of a further 200 dwellings at Sandy Hill at Moulton is not considered to be strongly linked to the SUE or an identifiable part of it.

The Infrastructure Delivery Plan (IDP) that supports the JCS has been updated. The delivery of the SUE will require supporting infrastructure including highway improvements and supporting services and facilities, however, it is not considered that the delivery of required infrastructure will render the site unviable.

The SUE will retain a separation from Overstone provided by indicative structural greenspace and Overstone Park. The separation and greenspace will also serve to protect the setting of Pytchley Gates and views of Overstone Park.

As regards flood risk, a simplified and consistent form of wording to address flood risk and surface water management has been agreed with the Environment Agency which will be included within each of the SUE policies as a Proposed Change. Detailed Flood Risk Assessment will be required as part of a planning application submission which will address the context of development in relation to small areas within in Flood Zones 2 and 3 and any impact on Overstone Lake.

In response to general comments not already covered in the responses above:

- The area is not of significant landscape importance that would be an absolute impediment to its development;
- The presence of gas pipes and power lines do not act as an impediment to the development of the site;
- Disruption for existing residents will be minimised wherever possible through planning control;
- The Policy requires an ecological assessment and required mitigation;
- The land is not high quality agricultural land and its agricultural grading does not act as a constraint to development;
- The planning system cannot protect individual property values;
- Northampton North is not 3.5 km from the centre of Northampton and this is proposed to be corrected in the text;
- The inset map is incomplete and Proposed Changes will enlarge the plan area covered;
- Billing Brook watercourse is correctly described; and
- The description of the area at Paragraph. 12.22 of the Pre-Submission JCS is a broad description of the area.

Recommended Action

That the supporting text, policy and proposals map inset be amended as set out in Proposed Changes:

PC008/N
PC009/N

PC010/N
PC011/N
PC012/N
PC013/N
PC014/MK

12.0 Northampton

69. Policy N4 – Northampton West SUE

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N4 – Northampton West Sustainable Urban Extension	1355	326	1029	10	1345	530	474	341	0

Summary of issues raised by Respondents

- Over 1,310 responses were made by local residents largely responding via petitions. Local groups and organisations also responded.
- The comments cover the following points:
 - The SUE should be dropped - no development should be allowed west of new road;
 - Sandy Lane Improvement North Road has been omitted from the JCS and therefore the plan is, inaccurate, misleading and unlawful;
 - Not a sustainable urban extension as it is not a sequentially preferable location or contiguous with the urban area as it is severed by the Sandy Lane Improvement North;
 - The site is isolated in a rural location with boundaries to the East, to the North, to the West and exposed to open countryside on all three sides;
 - A series of bridges and underpasses would be required to connect the SUE with existing urban development;
 - The proposal based upon an urban development located in a rural environment and is clearly not sustainable;
 - Alternatives to the North of Northampton (such as North East of Kingsthorpe, Holly Lodge Drive, Moulton Park and Moulton), are a sequentially preferable sustainable urban extensions;
 - A primary school would be isolated and difficult to access;
 - Land is owned by the two Harpole Charities since 1778, which is not acknowledged in the document and contravenes Policy R1 as land is of significant historic importance;
 - The development of areas around the south and west will adversely affect areas already suffering from pollution issues;
 - Farmland is required for food production;
 - Further explanation is required to demonstrate how the new and existing areas will interconnect and share facilities;
 - Historic Harlestone village will be spoilt and lose its identity;
 - The location of the site will encourage out commuting via the M1;
 - Local roads are already congested;

- Brownfield sites must be developed first;
 - The SUE was not shown in the EJCS;
 - The SUE should be replaced by extensions to Wootton Park and Grange Park;
 - The SLRR should be considered the western boundary of Northampton's development;
 - An alternative location is to the north of Northampton, North East of Kingsthorpe, Holly Lodge Drive, Moulton Park and Moulton;
 - Villages must retain their identity;
 - Insufficient clarity on infrastructure provision and funding;
 - Lack of evidence that sewage works has capacity;
 - Need to prevent coalescence through policy provisions;
 - Impact of flooding and need for flood attenuation not clear; and
 - Concerned regarding deliverability of the Northwest bypass without it there would be an adverse effect on quality of life for Brampton residents. Traffic calming also required.
- The respondent objects to the limit of retail floorspace and reference to local centre.
 - The respondent considers careful attention will be required through master planning to ensure the site is well integrated, and care given to Harlestone conservation area as well as protecting against coalescence. The respondent considers there should be no access through Port Road.
 - The respondent considers Paragraph 12.30 should note that Harlestone Firs is designated as a County Wildlife Site, that Harlestone is designated as a Conservation Area and that Paragraph 12.31 should refer to replacement of ecological interest as the road scheme will result in the loss of some features.
 - The respondent considers the words "a contribution towards" are not specific enough as a minimal amount could satisfy this requirement.
 - The respondent considers Sandy Lane Improvement (North) is already built so reference to land provision should be removed.
 - The respondent considers it is unclear whether improvements to A508 corridor should be linked to this site as this road is distant from the site.
 - The respondent considers the policy should refer to "flood risk management schemes" rather than "flood attenuation".
 - The respondent supports the allocation however, they object to the need to contribute to the North West Bypass and the delineation of 'Strategic Green Space'.
 - The respondent considers the allocation should be increased to 5,400 dwellings
 - The respondent considers the SUE is unviable and unsustainable.
 - The respondent considers Northampton West SUE should be deleted in favour of allocation of a proposed Northampton North of Holly Lodge Drive SUE.

Joint Planning Unit Response to Representations

The Sandy Lane Improvement North is proposed to be shown on the inset map. Reference to its provision within the policy is proposed to be deleted as the road is completed.

The Northampton West SUE has been the subject of Sustainability Assessment as part of the plan-making process. The SUE performs well against other alternatives including extensions to other SUEs and is a sequentially preferable site for development and to provide for the required housing growth.

The SUE has a boundary with the existing urban edge in similarity with other designated SUEs. It is the nature of SUEs that they are usually located on greenfield sites.

The JCS provides for and accounts for brownfield development, however the housing requirement cannot all be accommodated on brownfield sites hence greenfield allocations are required. In order to deliver the scale of development required a mix of brownfield and greenfield development needs to take place at the same time.

The Emergent JCS provided for a larger SUE which encompassed additional land to the south.

The location of Harpole Charities land has been taken into account but is not considered to be an absolute constraint on the development of this land.

The interconnection between the SUE and the existing urban area will require detailed consideration through the masterplanning work, however, there is no suggestion that this cannot be successfully achieved. The primary school will be required to serve the development and will be located to ensure easy accessibility to its catchment population.

As regards flood risk, a simplified and consistent form of wording to address flood risk and surface water management has been agreed with the Environment Agency which will be included within each of the SUE policies as a Proposed Change. Detailed Flood Risk Assessment including appropriate connection to the sewage works will be required as part of a planning application submission, however there is no indication through the Water Cycle Strategy and liaison with the Environment Agency and Anglian Water Services that this will act as an impediment to delivery.

The Northampton West SUE is located within a natural landscape bowl and areas of indicative structural greenspace will allow for the development to be assimilated into the surrounding area. It is considered the separate identity of Harlestone or Harpole villages will not be lost by the development of Northampton West SUE.

There is no indication that new development at the south and west of Northampton will have any significant effect on pollution issues.

County Wildlife Sites and conservation areas will be shown on the proposals maps. An ecological assessment and required mitigation is a requirement within the Policy.

The North West Bypass will be delivered in phases and supported via a number of developer contributions. Highway mitigation at a strategic level is specified within the policy however, the detailed extent of highway mitigation (e.g. the specification of minor junction improvements) and traffic calming through villages will be informed by

detailed transport assessments as required by Policy C2 (New Developments). The wording change suggested regarding mitigation of impact on the transport network is proposed to be incorporated into Policy C2 and does not need to be repeated in each of the SUE policies.

The JCS is supported by an Infrastructure Delivery Plan.

As regards retail provision it is accepted that some flexibility should be introduced in this respect. The Proposed Changes delete the convenience floorspace limit but require new retail provision to be of an appropriate scale. Policy S9 (Distribution of Retail Development) requires an impact assessment for proposals over 1000sqm gross floorspace.

Recommended Action

That the supporting text, policy and proposals map inset be amended as set out in the following Proposed Changes:

PC014/N
PC015/N
PC016/N
PC017/N
PC011/MK

12.0 Northampton

70. Policy N5 – Northampton South SUE

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N5 – Northampton South Sustainable Urban Extension	189	188	1	4	185	95	88	2	0

Summary of issues raised by Respondents

- 159 of the responses are standard representations received from local residents in the Hunsbury and Collingtree area. Responses relate to flooding issues, highway issues (traffic congestion and road noise) and the impact of affordable housing on the character of Collingtree.
- The respondent considers Northampton South should be deleted on the basis that the SUE is infrastructure heavy and would promote car borne trips due to its proximity to the M1. The respondent considers development at Northampton South should be replaced by additional land allocated at Northampton North.
- The respondents consider key issues raised in objection to the allocation relate to the perceived constraints including archaeology, ecology, noise and air pollution, sand and gravel safeguarding, impact on the local highway network, poor accessibility particularly by public transport, and viability of infrastructure.
- The respondents consider greater flexibility is required towards retail development on the site including the deletion of the 500sqm floorspace limit.
- The respondent supports the allocation but considers the allocation should be extended to include additional land to the west up to the railway line.
- The respondent objects to the exclusion of land from the allocation on the basis that it is not justified and is inconsistent with the SHLAA.
- The respondent considers the policy should refer to 'flood risk management schemes rather than 'flood attenuation'.
- The respondent considers the policy wording should be changed to: 'The development should mitigate its impact on the transport network through measures including:'

Joint Planning Unit Response to Representations

The Northampton South SUE is essentially a refinement of the Northampton South Preferred Location for Growth identified in the EJCS. This location was chosen following a robust assessment of all the reasonable development options for Northampton against a range of criteria relating to suitability, availability and

achievability. No additional evidence has emerged in the responses to the PSJCS to suggest that this should no longer be a preferred option.

The issues raised by respondents relating to flooding issues, highway issues and affordable housing are all matters that can be adequately addressed through masterplanning and the development management processes. They do not represent absolute constraints to the development of the site. The policy includes a specific requirement for surface water management to address flood risk from all sources. A detailed site specific flood risk assessment will be required to support any planning application on the site and other than the necessary road access no development will be permitted within Flood Zones 2 and 3. The technical work undertaken to date indicates that the proposed reconfiguration of the golf course as part of the SUE proposal will benefit flood alleviation along the Wootton Brook.

As regards highway impact the policy requires an integrated transport network focused on sustainable transport modes including public transport, walking and cycling with strong links to adjoining neighbourhoods, employment areas and the town centre. A detailed transport assessment will be required to support any planning application which will identify measures to mitigate the effect of development on the highway network.

Other 'constraints' to development such as ecology, archaeology, noise and air pollution can be addressed through further assessment and mitigation measures as specified in the policy and the supporting text.

Notwithstanding the potential mitigation measures it is recognised that the traffic from the SUE will add stress to an already congested road network, including the Queen Eleanor interchange on the A45 and junction 15 of the M1. For this reason the PSJCS adopted a cautious approach in terms of both the extent and overall capacity of the allocated site. The reduction in the extent of the site from that shown in the EJCS also excludes a significant area of ridge and furrow which is identified as being of medium cultural sensitivity within the Northampton Landscape and Green Infrastructure Study.

It is accepted that some flexibility should be introduced in respect of retail provision within the local centre and that the 500sqm floorspace limit can be deleted.

As regards flood risk, a simplified and consistent form of wording to address flood risk and surface water management has been agreed with the Environment Agency which will be included within each of the SUE policies as a Proposed Change.

The wording change suggested regarding mitigation of impact on the transport network is proposed to be incorporated into Policy C2 and does not need to be repeated in each of the SUE policies.

Recommended Action

That the supporting text, policy and proposals inset map be amended as set out in the following Proposed Changes:

PC018/N
PC019/N
PC020/N
PC016/MK

12.0 Northampton

71. Policy N6 – Northampton South of Brackmills SUE

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N6 – Northampton South Sustainable Urban Extension	189	188	1	4	185	95	88	2	0

Summary of issues raised by Respondents

- The following points were raised by respondents:
 - Concern expressed about the capacity of secondary education, with particular reference to the Caroline Chisholm School:
 - Lack of recognition of the landscape sensitivity of the 'Nene Ridge' within the JCS and the policy. There is a specific request for the provisions of existing Northampton Local Plan policies relating to landscape and skyline development being included within Policy N5; and
 - The area is already densely populated and development could be better accommodated to the north and north-east of Northampton.
- The respondent considers an additional area of land, which is physically detached from the Brackmills SUE to the south and east of Wootton Fields, should be allocated to accommodate an additional 1,000 dwellings:
- The respondent considers an additional 24ha of land to the east of the SUE should be allocated which would increase its capacity to 1,500 and make it more sustainable.
- Representations from retail interests seek greater flexibility towards retail development on the site including the deletion of the 500sqm floorspace limit.
- The respondent considers the policy wording should be changed to refer to 'flood risk management schemes rather than 'flood attenuation'.
- Respondent considers the policy wording should be changed to state: 'The development should mitigate its impact on the transport network through measures including:'
- The respondent suggests the inclusion of the following within the policy: 'Archaeological and ecological assessment of the site and required mitigation.'
- The respondent supports the policy and is committed to the delivery of the SUE.

Joint Planning Unit Response to Representations

The South of Brackmills SUE formed part of the Northampton South East preferred location for growth which was identified in the Emergent JCS. The wider Northampton South East option is not taken forward as an SUE in the Pre-

Submission JCS, principally due to the significant delivery risks associated with the large scale development and the supporting infrastructure, especially the highway infrastructure. The South of Brackmills SUE provides the opportunity for a smaller mixed use urban extension which adjoins the existing urban area and can be developed without the need for major infrastructure. The site is owned by the Homes and Communities Agency and has been included within their national accelerated delivery programme. There is therefore a high degree of certainty that the site will be delivered within the plan period.

As with all SUEs infrastructure is required to be delivered alongside the development and this will include adequate secondary school provision. The IDP includes provision for the extension of secondary schools in Northampton to ensure that sufficient capacity exists.

It is accepted that some flexibility should be introduced in respect of retail provision within the local centre and that the 500sqm floorspace limit can be deleted.

As regards flood risk, a simplified and consistent form of wording to address flood risk and surface water management has been agreed with the Environment Agency which will be included within each of the SUE policies as a Proposed Change.

The wording proposed in respect of archaeological and ecological assessment is acceptable and would be consistent with the other SUE policies.

The wording change suggested regarding mitigation of impact on the transport network is proposed for incorporation into Policy C2 and does not need to be repeated in each of the SUE policies.

The policy and the supporting text refer to the provision of landscape buffers and green infrastructure corridors. The supporting text refers to the creation of a green corridor and to the need for the development to consider the impact on the skyline when viewed from the north. It is therefore considered that the policy provides adequate recognition of the landscape sensitivity of the site, including the importance of the Nene Ridge. The Northampton Local Plan policy relating to skylines will remain as a saved policy and as such will continue to be a material consideration.

The development of this SUE is an important part of the overall spatial strategy in the PSJCS which provides for a range of sites adjoining the existing urban edge of Northampton, all of which are capable of being delivered during the plan period. If all the development were to be concentrated in one location i.e. the north/northeast as suggested in representations, then it is unlikely that this would be delivered in the plan period. It would also reduce the choice of sites available to the market.

The site of the SUE is well contained by the existing urban area, woodland, roads and other clearly defined physical boundaries. The further development suggested in the representations would extend development into the open countryside and impact upon land which is of medium to high landscape sensitivity. It should be recognised that the traffic from the SUE will add stress to an already congested road network, including the Queen Eleanor interchange on the A45 and junction 15 of the M1. Further development would clearly add to congestion on the network.

Recommended Action

That the supporting text, policy and proposals map inset be amended as set out in Proposed Changes:

PC021/N
PC022/N
PC015/MK

12.0 Northampton

72. Policy N7 – Northampton Kings Heath SUE

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N7 – Northampton King's Heath Sustainable Urban Extension	14	14	0	3	11	4	6	1	0

Summary of issues raised by Respondents

- A respondent considers policy should refer to "flood risk management schemes" rather than "flood attenuation" and in Paragraphs 12.52-12.58 reference should be made to the inclusions of Flood Zones 2 and 3 within discussion on Northampton Kings Heath SUE.
- The respondent considers the policy wording should be changed to include, 'The development should mitigate its impact on the transport network through measures including:' and that wording is changed to state "Provision of part and financial contribution towards completion of the North Western Bypass".
- The respondent support the allocation of the SUE but consider amendments to the policy should include;
 - A need to recognise a phased delivery will be necessary - anticipated to be 1,950 with further environmentally unconstrained land to follow capable of delivering some 2,950 in total;
 - Further testing of the environmental constraints on the remaining and will be required for a development of 3,500 dwellings to be achieved; and
 - Strongly object to the linkage currently proposed in relation to the Kings Heath allocation in Table 7.
- The respondent considers there will be a need to review the retail component.
- The respondent the extent of Structural Greenspace shown on the Proposals Map should be larger, particularly to the north-west boundary with Harlestone Firs and the River Nene valley to the east.
- The respondents consider that the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace to be in Northampton town centre and SUEs. The respondents consider reference to local centre and floorspace limits should be removed.
- The respondent questions the viability of the North West Bypass and the Park and Ride and feel that traffic calming in the Bramptons will be required.
- The respondent considers clarity is required on what "Community Facilities" might be in contrast to clearly defined educational provision within the policy text. The respondent draws attention to the fact that the existing developments of St Crispins, Upton and the Timkin site have no provision for new worship areas.

- Respondents consider the highway mitigation proposed is insufficient.
- Respondents express support the principle for the development of the SUE.

Joint Planning Unit Response to Representations

Support for the SUE allocation is welcomed.

As regards flood risk, a simplified and consistent form of wording to address flood risk and surface water management has been agreed with the Environment Agency which will be included within each of the SUE policies as a Proposed Change.

The wording change suggested regarding mitigation of impact on the transport network is proposed to be incorporated into Policy C2 and does not need to be repeated in each of the SUE policies. The detailed extent of highway mitigation and traffic calming through villages will be informed by detailed transport assessments as required by Policy C2 New Developments.

The Policy recognises a phased delivery will be required for the full development which can be set out in the required masterplan. However, the delivery of 3,500 dwelling on the site as indicated by the developers initially is now questioned. The overall quantum of housing has been reassessed having regard to the densities that will be deliverable across the site and in recognition of archaeological and ecological constraints on the site. A realistic figure of in the region of 3,000 houses is considered appropriate for the site. The delivery of the development will be dependent on highway improvements. Table 7 in the Infrastructure and Delivery Chapter has been updated to refer to timings of phases of highway infrastructure provision.

As regards the Park and Ride Northamptonshire County Council as the local highway authority consider delivering Park and Ride, even on the busiest corridors, by 2026 will be challenging and there has been no progress in establishing a viable business case for a Park and Ride bus service from any of the sites. As such, Park and Ride as a requirement from this SUE is proposed to be deleted from the JCS.

The structural greenspace shown within the inset plans is indicative. The detailed extent of this greenspace will be informed by masterplanning work.

As regards retail provision it is accepted that some flexibility should be introduced in this respect. The Proposed Changes delete the convenience floorspace limit but require new retail provision to be of an appropriate scale. Policy S9 Distribution of Retail Development requires an impact assessment for proposals over 1,000sqm gross floorspace.

The type and extent of new community facilities at the SUE will be considered in detail through the master planning process including neighbourhood engagement.

Recommended Action

That the supporting text, policy and proposals map inset be amended as set out in Proposed Changes:

PC023/N
PC024/N
PC025/N
PC026/N
PC012/MK

12.0 Northampton

73. Policy N8 – Northampton North of Whitehills SUE

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N8 – Northampton North of Whitehills Sustainable Urban Extension	16	16	0	3	13	5	7	1	0

Summary of issues raised by Respondents

- The respondent considers there should be mention of the historic village of Boughton in the text. The respondent further considers the development is not needed and the allocation should be deleted.
- Respondents consider the North West Bypass should be shown more accurately on Figure 4.
- Respondents consider there will be local road congestion as a result of the development and the mitigation required should be specified.
- The respondent questions the viability of the Park and Ride site and the delivery and funding of the North West bypass. In addition the respondent considers traffic calming in the Bramptons will be required.
- Respondents consider the SUE is neither viable nor sustainable and that the highway mitigation proposed is insufficient.
- The respondent considers the status of the SUE as an existing allocation through an adopted DDLP means it should be treated as a commitment.
- Respondents consider the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace in Northampton town centre and SUEs. They consider reference to local centre and floorspace limits should be removed.
- A respondent considers any development within Northamptonshire would represent an increased burden on the provision of Secondary healthcare for the county and it is therefore imperative that any developments that are delivered through would need to formally involve consultees including the hospital along with the Primary Care Trust and NHS Northamptonshire.
- The respondent considers the supporting text should refer to financial contributions being required for improvements to the Cock Hotel junction.
- The respondent considers that all transport mitigation measures are preceded by a statement such as "The development should mitigate its impact on the transport network through measures including:" and reference to land provision for the North West Bypass in the policy should be deleted.
- Respondents express support for the principle of development of the SUE.

Joint Planning Unit Response to Representations

The support in principle for the SUE is welcomed.

The SUE allocation at Northampton North of Whitehills has already received outline planning consent during the course of plan preparation. The site is a sustainable location for new development and its development is required to support housing growth for the needs of the population.

The JPU agrees that reference to the historic village of Boughton in the text is helpful descriptively although this does not affect the soundness of the plan.

The purpose of Figure 4 of the JCS is to show the Northampton Related Development Area and is of a scale that cannot be precise as regards road infrastructure.

The wording change suggested regarding mitigation of impact on the transport network is proposed to be incorporated into Policy C2 and does not need to be repeated in each of the SUE policies.

The Policy wording includes a requirement for financial contribution towards the Kingsthorpe Corridor, the Cock Hotel Junction and the North West Bypass. It is not considered that further reference to financial contributions to the Cock Hotel Junction through the supporting text is necessary. Reference to a land requirement for the North West Bypass is proposed to be deleted through the Proposed Changes as further work has shown that no land requirement is necessary from the SUE.

Highway mitigation at a strategic level is specified within the policy, however, the detailed extent of highway mitigation (e.g. the specification of minor junction improvements) and traffic calming through villages will be informed by detailed transport assessments as required by Policy C2 New Developments.

As regards the Park and Ride Northamptonshire County Council as the local highway authority consider delivering Park and Ride, even on the busiest corridors, by 2026 will be challenging and there has been no progression in establishing a viable business case for a Park and Ride bus service from any of the sites. As such, Park and Ride as a requirement from this SUE is deleted from the JCS.

The North West Bypass will be delivered in phases and supported via a number of developer contributions.

As regards retail provision it is accepted that some flexibility should be introduced in this respect. The Proposed Changes delete the convenience floorspace limit but require new retail provision to be of an appropriate scale. Policy S9 Distribution of Retail Development requires an impact assessment for proposals over 1,000sqm gross floorspace.

Healthcare providers for both secondary (acute) and primary care have been consulted in respect of the JCS. Secondary healthcare for the county is provided at Northampton General Hospital. Northamptonshire NHS has confirmed that no

upgrade to Northampton General Hospital is currently planned, and that no upgrade is considered necessary as a result of the growth of West Northamptonshire. Northampton General Hospital NHS Trust has expressed concerns in adequately meeting future needs due to present uncertainty in Government funding provision.

Northampton General Hospital has developed incrementally over the years and the incremental from of development has not resulted in the best use of the site, which impacts on the efficiency of service. It contains a number of single storey buildings and all car parking is at surface level. There are opportunities to improve the efficiency of the site however present uncertainties with healthcare funding make it difficult for the hospital to plan with any certainty over the longer period for holistic site improvements. The hospital has started the process of planning for the future use of its site and has developed a Strategic Masterplan. Smaller changes to hospital facilities are undertaken in-line with the overall Masterplan. There is a potential funding gap for acute services provision which is beyond the means of developers' contributions to influence. No information is available on how large any funding gap could be, but it is likely that Government funding would be needed in order to raise the funds needed.

The Primary Care Trust and NHS Northamptonshire are formal consultees in the development of the JCS.

Recommended Action

That the supporting text, policy and proposals map inset be amended as set out in Proposed Changes:

PC027/N

PC028/N

PC013/MK

12.0 Northampton

74. Policy N9 – Northampton Upton Park SUE

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N9 – Northampton Upton Park Sustainable Urban Extension	136	136	0	5	131	64	65	2	0

Summary of issues raised by Respondents

- 121 of the 136 representations were submitted as a standard form stating that;
 - There should be no development west of the new road; and
 - The Country Park extension should be confirmed in Norwood Park/ Upton Lodge development between Sandy Lane and the new road.
- Respondents consider that the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace in Northampton town centre and SUEs. Respondents consider reference to local centre and floorspace limits should be removed;
- A respondent supports the extension of the Country Park and reference to green links;
- The respondent considers reference to archaeological assessment of the site and required mitigation should be made in the policy; and also that measures to ensure the protection of the setting of listed buildings and the scheduled monument at Upton should be included in the policy text. The respondent considers also considers Inset Map 13 should include the boundary of the scheduled monument and an indicative buffer to protect the setting of the heritage assets;
- The respondent suggests all transport mitigation measures are preceded by a statement such as "The development should mitigate its impact on the transport network through measures including:"
- The respondent considers clarity is required on what "Community Facilities" might be in contrast to clearly defined educational provision within the policy text. The respondent draws attention to the fact that the existing developments of St Crispins, Upton and the Timkin site have no provision for new worship areas;
- The respondent supports the allocation in principle, however suggests some wording changes to include replace "2016" with "2013" in Paragraph 12.70 as the development can commence earlier and to include the word 'approximately' before '1,000 dwellings' to allow for flexibility in the master planning of the site. The respondent further considers the allocation of 'Structural Greenspace' is too detailed for the purposes and objectives of a Core Strategy and considers this

would be better refined through the master planning process. The respondent however supports the need for Structural Greenspace and suggests a criterion is added to the policy as a way of providing guidance on what is required on-site rather than an allocation on an inset map;

- A respondent questions what road improvements are to be made to encourage people to travel into Northampton from the western side of the county;
- The respondent is concerned that villages must retain their identity and not be swallowed up by towns; and
- Respondents express support the principle for the development of the SUE.

Joint Planning Unit Response to Representations

Support for the policy is welcomed.

It is accepted that the Cross Valley Link Road represents the logical eastern boundary for built development within the SUE. As such the Inset Map should be amended to show that only greenspace will be provided to the east of the CVLR. This accords with the planning application that has been submitted by the HCA and will ensure that the physical and visual separation of the urban edge and neighbouring villages is preserved. It will also maintain and enhance an important green infrastructure corridor.

The wording proposed in respect of archaeological assessment is acceptable and would be consistent with the other SUE policies. Following further discussion with the HCA it is apparent that no development is proposed that would affect the listed buildings and scheduled ancient monument at Upton in the north-western quarter of the site. It is proposed that this area should be excluded from the SUE allocation boundary. As such an indicative buffer is not required.

The support for the Country Park and green links and the principle of the SUE is noted and welcome.

It is accepted that some flexibility should be introduced in respect of retail provision within the local centre and that the 500sqm floorspace limit can be deleted.

The wording change suggested regarding mitigation of impact on the transport network is proposed for incorporation into Policy C2 and does not need to be repeated in each of the SUE policies.

A minor change is proposed to make it clear that the Structural Greenspace is shown indicatively, to provide flexibility for a more detailed definition in masterplans and planning applications. It is also recognised that the development of the site is likely to commence in the early part of the plan period.

A series of road improvements are shown in the IDP, including the provision of the North West Bypass, which will improve accessibility from the western side of Northampton.

Recommended Action

That the supporting text, policy and proposals map inset be amended as set out in Proposed Changes:

PC029/N
PC030/N
PC031/N
PC032/N
PC033/N
PC017/MK

12.0 Northampton

75. Policy N10 – Shopping Needs Outside Northampton Town Centre

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N10 – Shopping Needs Outside Northampton Town Centre	9	9	0	1	8	3	4	1	0

Summary of issues raised by Respondents

Employment

- The respondent considers the final sentence of Paragraph 12.72 should be deleted as the allocation of a further strategic employment sites on the edge of Northampton is necessary due to the shortfall in Northampton of high quality, deliverable sites.
- The respondent considers reference to additional strategic employment sites should be made in the penultimate sentence of Paragraph 12.74. The representation recommended that the sentence be reworded to include mention of both a strategic employment site and a 'technology realm'.

Policy N10: Shopping Needs Outside Northampton Town Centre

- Representations raise concerns about the restriction of additional comparison goods floorspace outside the Northampton central area.
- The respondent considers the policy is not necessary and is inappropriate over the lifetime of the plan.
- Respondents express support for the policy approach.

Joint Planning Unit Response to Representations

There is no identified need for the further allocation of strategic employment sites. Further allocations would be likely to compete with more sustainable employment land including derelict land in the SEMLEP Northampton Waterside Enterprise Zone on the edge of Northampton town centre.

The JCS responds to the National Planning Policy Framework which requires a sequential approach to retail development where the town centre is the first sequential preference. However, reference to no further comparison floorspace outside the town centre is deleted to provide for greater flexibility to respond to local

needs outside the town centre provide these are of local scale and any adverse impact on higher order centres is fully assessed.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC034/N
PC035/N
PC036/N
PC037/N

12.0 Northampton

76. Policy N11 – Supporting Areas of Community Regeneration

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N11 – Supporting Areas of Community Regeneration	2	2	0	1	1	0	0	0	1

Summary of issues raised by Respondents

- A respondent objects to the policy as there seems no attempt to connect Policy N11 with Policy N4 despite dealing with the same area, Kings Heath and Spencer.
- The respondent supports the policy but suggested additional amendments to read: "To support the regeneration of Spring Boroughs, Kings Heath/ Spencer and Northampton East, Northampton Borough Council will, working in partnership with other service providers and with the full involvement of the local community, set out a strategy approach designed to address the key principles of delivering inclusive, sustainable communities, to include the following....."

Joint Planning Unit Response to Representations

The policies within the JCS should be read as a whole.

The Proposed Changes make some changes to the Policy wording as suggested by the respondent.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC038/N
PC039/N
PC040/N
PC041/N
PC042/N
PC043/N

12.0 Northampton

77. Policy N12 – Northampton’s Transport Network Improvements

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N12 – Northampton's Transport Network Improvements	4	4	0	1	3	0	3	0	0

Summary of issues raised by Respondents

- The respondent considers the Policy should be amended to identify the strategic transport infrastructure that is to be funded through CIL and that the supporting text refers to the strategic transport measures for Northampton as set out in the infrastructure schedule.
- A respondent expresses concerns that the policy provides no detail on how connectivity with Healthcare is to be improved and the lack of public parking on the hospital site.
- Representations suggest amendments to Policy N12 to link the proposed improvements to the bus station as part of the delivery of the CAAP. These include amending policy N12 to refer to sustainable transport modes to link principal destinations, improved connectivity throughout the Central Area from all parts of the town, reference to Northampton Castle Station and Greyfriars Bus Station as priority interchanges, and reference to ‘redevelopment’ of the Grosvenor Centre.

Joint Planning Unit Response to Representations

It is not for the JCS to identify the strategic transport infrastructure that is to be funded through CIL. Each of the partner authorities will determine their spending priorities for CIL in their capacity as separate and coordinated charging authorities.

The Infrastructure Delivery Plan that supports the JCS takes into account health care provision. Access to health care as a community facility is within the framework of the Connections section and its policies. In respect of Northampton General Hospital’s parking provision this is a matter for the Hospital Trust.

The policy refers to improvements to both the bus station and Northampton Castle Station and improved connectivity throughout the town centre by public transport walking and cycling.

The Grosvenor Centre as a retail centre improvement is referred to in the section covering Northampton Central Area and in more detail as a proposal within the Northampton Central Area Action Plan.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC044/N

PC045/N

13.0 Daventry

78. Introductory Text (Introduction and Daventry Today)

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	6	6	0	3	3	2	1	0	0

Summary of issues raised by Respondents

- Respondents referred to the Town Centre Vision produced with the Civic Trust in 2004, the new masterplan, which is being prepared for Daventry town - Daventry 2040, the development proposals at Eastern Way and where the Waterspace proposals are with reference to Daventry District website.
- Other response comments that the Waterspace proposal should be deleted as it is not a committed scheme.
- One respondent is unconvinced that Southbrook area requires attention and doubts that planned new developments will provide Southbrook accessible amenities due to distance. Other areas are more in need of regeneration [these other areas are not named].
- One respondent considered major residential development in the town centre was questionable as will take away employment and open space.
- A respondent considered there needs to be a wider vision for the area encompassing areas to the west of Daventry and their catchments. Development should take place within the town before expanding too far from the centre and facilities for the younger generation and for the disabled are required in new development.
- One respondent felt Daventry should have a rail line to Weedon and a station at Weedon.

Joint Planning Unit Response to Representations

The JPU agrees with the need to add reference to the masterplan for Daventry 2040 which has been consulted on since the issue of the Pre-Submission JCS as a factual update.

The JPU does not consider reference to the Town Centre Vision 2004 is essential within this supporting text and will add further unnecessary text to an already large document. This document is to be replaced by the 2040 masterplan.

The introductory text within a strategic document is not intended to be a comprehensive list of all Daventry town centre proposals as this information is readily available elsewhere.

The Waterspace proposals are now the subject of a planning application. As a high profile potential development for Daventry a reference to this proposal is considered appropriate.

Southbrook has been identified by Northamptonshire County Council as an area for community regeneration. The area has a history of social problems, lower educational attainment and higher level of crime and anti-social behaviour. Policy RC1 allows for other areas to be identified for community regeneration following assessment.

The JCS does not specify sites within the town centre for residential development, but it is appropriate that the best use of existing urban land is taken into account in considering the growth of Daventry. Town centre applications for residential development will be considered in detail by the local planning authority where an assessment of the desirability of retaining any existing uses will be made.

The JCS does recognise adjoining areas and their catchments as described in the spatial portrait and the local planning authorities in West Northamptonshire have a duty to cooperate with adjoining authorities.

Provision of community facilities and accessibility in new developments will be considered in detail at planning application stage.

There are no plans for a rail connection for Daventry or a station at Weedon. The cost of this infrastructure is likely to be high and unlikely to represent best value for money.

Recommended Action

That the introductory text to the Daventry section be revised as set out in the following Proposed Changes:

- PC001/D
- PC002/D
- PC003/D
- PC004/D
- PC005/D
- PC006/D
- PC007/D

13.0 Daventry

79. Policy D1 – The Regeneration of Daventry Town

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy D1 – The Regeneration of Daventry Town	7	7	0	2	5	4	1	0	0

Summary of issues raised by Respondents

- A respondent considers Policy D1 should include reference to the desirability of developing a green infrastructure network for the town, as set out in the Daventry Infrastructure Studies, Main Report, January 2009. and an additional item should be added to Appendix 4 West Infrastructure Schedule, page 219, highlighting the need for improvements to Borough Hill Country Park and Burnt Walls scheduled monument.
- Respondent requests consideration of surface water management in the policy.
- A respondent considers the wording in Paragraph 13.19 implies that the required improvements to the A45 arise solely as a consequence of the SUE.
- Reference should not be made to planning consent being granted in 2009 for an SUE at Monksmoor as it was only outline consent and site may not be delivered. Monksmoor Farm should be identified via a JCS policy and by notation on the Key Diagram in order that a long term commitment to the development is enshrined in policy in the event that a renewal of consent or new application was needed.
- Respondent considers that Paragraph 13.17 contradicts the planning appeal judgement as it suggests that further development additional to the Monksmoor site can take place without resolution of the highway issues. The respondent's interpretation is that a total of 800 units across Daventry could be allowed before the highways issues are resolved. The respondent considers that as funding for this comes from developer contributions at Monksmoor, it is the only that site which can be allowed to proceed at this stage.
- Respondent asserts that without the A45 bypass and its part public funding the Daventry North East SUE cannot be brought forward, consequently the JSC cannot be considered 'sound'. The respondent considers Policy D1 should be amended to remove the reference to 'Daventry North East SUE' as until funding is made available for the bypass the site cannot be delivered.
- The respondent considers to maintain a 5 year land supply an alternative SUE is proposed to south east of the town and fronting the A45, which can be 'accommodated on the existing line of A45'.
- The respondent considers Daventry District Council's Open Space Sport and Recreation Needs Study (2009) should be incorporated into all development

plans. In the respondents opinion Daventry has a deficiency in open space and recreation facilities and any lost should be replaced, for example at Eastern Way. The respondent considers that a canal should not be considered a green space.

- The respondent considers topography should be fully understood in overarching planning decisions.
- The respondent asks if there is evidence to show that Daventry needs hotels and residential development in the Town Centre.
- The respondent considers the JCS needs to demonstrate it is serious about its objectives without publishing contradictory plans for example providing more housing in the town centre but at the expense of leisure facilities, open space and space for more retail facilities.

Joint Planning Unit Response to Representations

The JPU considers that the policy will be improved by the addition of a further bullet point with reference to green infrastructure as suggested by the respondent. The green spaces within Daventry and historic green spaces such as Borough Hill are important to the amenity of the town and its residents. Whilst Policy BN1 generically covers green infrastructure connections and Policy BN5 covers the historic environment including historic landscapes, reference to greenspace protection as part of the regeneration of Daventry supports the overall approach and enhances the policy context. Reference to the enhancement of Borough Hill Country Park as an infrastructure requirement is made in the updated Infrastructure Delivery Schedule.

Policy BN7 refers to flood risk and surface water management in development proposals throughout the West Northamptonshire area. The strategic allocation of Daventry North East SUE also refers to the need to ensure surface water management is addressed in the delivery of this development. Further reference in the generic Regeneration of Daventry policy is not considered necessary.

The Monksmoor development is now at an advanced stage with developers on board and discussions regarding S106 and reserved matters applications. Early delivery is anticipated. The development is included within the housing trajectory and in the increasingly unlikely event that the consent should lapse its previous consent and inclusion as a commitment within the JCS are material considerations. It is not considered that an additional policy for the Monksmoor development is necessary.

In respect of highway considerations the appeal inspector considering conjoined appeals for development at Daventry in 2009 advised that the Monksmoor development could be delivered provided improvements to the Weedon A5/A45 crossroads were in place. This junction improvement would provide capacity for the Monksmoor development at 1,000 dwellings and a further 1,250 dwellings could be delivered at Daventry before the delivery of a Flore/Weedon bypass.

The conjoined appeal inquiry identified that a phase 1 delivery of development at Daventry North East SUE would be achievable with Weedon A5/A45 junction improvements in place. The delivery of the remaining development (circa 750 by 2026 and a further 2,000 dwellings post 2026) would be dependent on the delivery of

a bypass. The conjoined appeal decision in 2009 concluded that the bypass must in part be publicly funded as it is required as a response to existing growth. Indications when aligned with the JCS housing trajectory are that the bypass will not be required until the latter part of the plan period. Northamptonshire County Council is actively seeking public funding for the bypass through major scheme funding. This funding will be supported by developer contributions from the Daventry North East SUE and potentially through the Community Infrastructure Levy.

The alternative SUE suggested to the south east of the town will still require highway improvement to deliver housing as any strategic development at Daventry beyond the housing quanta advised by the Daventry appeals will require highway improvements to the A45 to the east of the town. An SUE to the south east of Daventry was subject to sustainability appraisal¹ at the emergent Joint Core Strategy Stage. Development at south east Daventry performed marginally less well against a number of indicators than a development at the north east. The north east is therefore the preferred sustainable choice for SUE location in the JCS.

The Daventry Open Space, Sport and Recreation Facilities Strategy 2009 has been taken into account in developing the JCS and is listed as part of the evidence base in its appendix. Policy RC2, Community Needs, of the JCS refers to such studies. Policy INF1, Approach to Infrastructure Delivery, requires new development to ensure it is supported by infrastructure including green and social elements.

The town centre proposals that are being brought forward by Daventry District Council accord with the policy framework of Policy D1 - The Regeneration of Daventry. The National Planning Policy Framework advises that residential development should be encouraged in town centres as it can play an important role in ensuring their vitality. Hotel development is also a main town centre use.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC008/D
PC009/D
PC010/D
PC011/D
PC012/D
PC013/D
PC014/D

¹ West Northamptonshire Emergent Joint Core Strategy Draft Sustainability Appraisal Report 2009 – available at JPU website www.westnorthamptonshirejpu.org

13.0 Daventry

80. Policy D2: Daventry Town Centre

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy D2 – Daventry Town Centre	3	3	0	2	1	0	0	1	0

Summary of issues raised by Respondents

- The respondent considers that the policy must acknowledge how the historic environment will inform the approach to development in line with the Government's objectives. The respondent recommends additional text to promote heritage-led regeneration within the conservation area.
- The respondent considers there needs to be some consideration of surface water management in the policy.
- The respondent considers new shops and big retail names will force out individual traders and the town centre will lose its appeal.

Joint Planning Unit Response to Representations

The JPU considers that the policy will be improved by the addition of further text in relation to the need to appropriately consider the conservation of the heritage assets of the town centre in the context of managed change. Daventry town has an historic core that is protected by conservation area designation. Whilst Policy BN5 refers to the historic environment in relation to development it is considered appropriate to draw attention to Daventry town centre's historic assets in the context of a policy covering the town centre.

Policy BN7 refers to flood risk and surface water management in development proposals throughout the West Northamptonshire area. Further reference in the generic Daventry Town centre policy is not therefore considered necessary.

Detailed proposals for the town centre will be required to adhere to the policy framework set out in the JCS. As noted in paragraph 5.63 of the JCS under the heading Distribution of Retail Development there is a need for Daventry to improve its retail offer both as a niche retailing destination and for large high street store to ensure it continued vitality and viability, and to reclaim some expenditure lost to other destinations ¹

Recommended Action

¹ West Northamptonshire Retail Study Update 2001 and 2012 addendum. JPU website refers

That the policy be amended as set out in the following Proposed Change:

PC0015/D

13.0 Daventry

81. Policy D3 - Daventry North East Sustainable Urban Extension

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy D3 – Daventry North East Sustainable Urban Extension	22	22	0	5	17	9	7	1	0

Summary of issues raised by Respondents

- A respondent considers Policy D3 should refer to "flood risk management schemes" not "flood attenuation" as flood risk management can include attenuation but could include many other measures. Respondent also considers Policy D3 should be strengthened to ensure no development is located within the extent of the dam break area.
- The respondent considers that nationally important designated heritage assets should be shown on the inset map, in the same way as nature conservation sites are shown.
- A respondent considers Borough Hill could provide enhanced green space for the residents of the SUE, as well as existing residents and visitors, and should be referred to in this policy. The respondent further considers an additional bullet point should refer to financial contributions to improvement to Borough Hill as part of the Green Infrastructure Network.
- The respondent considers that the criteria for the development of this SUE should refer to the need for archaeological or ecological assessment, as there are references to the need for archaeological assessments in other SUE policies, e.g. Policy N3.
- The respondent considers "A contribution towards" is not specific enough, as a minimal amount could satisfy this requirement. Policy D3 should read "The development should mitigate its impact on the transport network through measures including...."
- The respondent expresses concern over the impact of growth in Daventry on the A5/A45 junction at Weedon. The respondent comments that currently there are no plans to improve the A5/ A45 junction beyond what should be delivered as part of the Monksmoor development. The respondent is of the opinion that the inspector considering the conjoined planning appeals for Daventry in 2009 commented that no further significant development should be allowed in Daventry until the link issues through Flore and Weedon are addressed.
- A respondent considers that the JCS is unsound as there is no justification for restricting Daventry North East to three local centres and limiting the size of

stores. They are of the opinion that the floor space figures are arbitrary, lack flexibility and should be deleted.

- The respondent supports the allocation, but considers that restricting development to commence from the south eastern edge places an unreasonable constraint on the developer. In addition the respondent considers the development should provide for two local centres and a district centre given the scale of the development and that restricting individual stores to not exceed 500 sqm will result in the development not sufficiently meeting the needs of residents.
- The respondent considers that placing an arbitrary limit on the quantum of housing development to be delivered by 2016 is an unjustified and unnecessary constraint. The sentence should be reworded to read 'At least 2,500....'
- A respondent considers the Monksmoor Farm development should be allocated via Policy D3, shown on the relevant maps and referred to in supporting text at policy D3.
- The respondent considers land at Daventry North East SUE should be reserved for development post 2021 and the JCS should allocate land adjacent to Boughton for Northampton North of Holly Lodge Drive SUE with a capacity of circa 1,000.
- The respondent considers the allocation of Daventry North East SUE is not the most appropriate strategy when considered alongside all reasonable alternatives and the JCS is therefore unsound. They consider Policy D3 and Daventry North East SUE should be deleted from the JCS and land at Mickle Well Park should instead be allocated since it is more appropriate in terms of flood risk, landscape and heritage and highways implications.
- A respondent considers that the Daventry North East SUE should be deleted and substituted by a Daventry South East SUE together with other smaller sites [unidentified].
- A respondent feels Paragraph 13.25 should include wording consistent with that used in 12.68 requiring 'sympathetic treatment of development at the country park edge'.
- A respondent feels Paragraph 13.25 should make reference to the fact that the reservoir is designated as a Conservation Area and is a designated Local Nature Reserve.
- The respondent considers Policy D3 should not specifically state 420 place primary schools where Policy T3 just refers to primary schools.
- The respondent queries why reference is made to provision of 'local employment opportunities' whereas Policy T3 is specific about the number of jobs.
- The respondent considers clarity is required on the form of the A45 improvements and cost as without this the full implications of the Daventry North East SUE are not taken into account and the plan is therefore unsound.
- The respondent considers that if Long Buckby railway station is to be part of the transport network it requires a more frequent bus service and as people will still drive to the station more parking will be required.
- The respondent considers the policy must make provision for road safety.
- The respondent considers Long Buckby Road improvements (B4036) should be given priority, and Norton should have traffic calming measures implemented.

- The respondent considers references to 'phased accordingly' for the introduction of infrastructure is too open ended and should be more precise, detailed and measurable in terms of deliverable constraints.
- The respondent considers the policy must reflect the need avoid a detrimental effect on the visual landscape around Borough Hill.
- The respondent considers natural contours of land should be used to determine site boundaries.
- The respondent considers natural planting for screening should be planted before development takes place
- The respondent considers waste water infrastructure does not appear to have been adequately assessed.
- The respondent considers there should be clear and effective boundaries between any development and the village of Norton.
- The respondent considers Daventry should expand from Daventry Centre, outward and not start from open countryside inwards. To keep "Town Centre" as the Central more developments are needed to the South and Southwest.
- The respondent considers Agricultural land should be built on as a last resort due to the need for UK food production.
- The respondent considers "Village Design Statements" should be incorporated into the consultation process.

Joint Planning Unit Response to Representations

The JPU agrees with the respondent in that the last two bullet points of the policy can be appropriately combined in to a single bullet point relating to flood risk management. The detailed layout of the scheme will be informed by the master planning process. The indicative structural green space alongside the reservoir includes the flood zone areas 1 and 2 and the extent of the dam break area. This is referred to in the supporting text to the policy.

Nationally important designated heritage assets are shown on the Saved Proposals Maps of the Partner authorities' Adopted Local Plans.

The JPU agrees that the historic green space of Borough Hill is important to the amenity of the town and its residents. Reference to the enhancement of Borough Hill Country Park as an infrastructure requirement is made in the updated Infrastructure Delivery Schedule. It is considered that the importance of Borough Hill does not relate solely to the Daventry North East SUE but to the wider town. The SUE is already providing greenspace to accommodate the canal arm and as an extension of Daventry Country Park. In the future should the Community Infrastructure Levy be adopted by the District Council CIL monies could be directed to Borough Hill Country Park if the Council considered it an infrastructure priority.

The JPU agrees that reference to archaeological and ecological assessment is required as part of the policy for the sake of consistency of approach across all SUE policies and to ensure any information already collected is up to date.

The JPU agrees that bullet point 8 of Policy D3 could be improved to ensure it is clear that the development must mitigate its highway impact off-site which will include a necessary contribution to off-site highway works. Policy INF2 and its

supporting text clarifies that the extent of financial contributions are controlled by Regulation 122 of the Community Infrastructure Levy Regulations as amended and the National Planning Policy Framework.

In respect of highway considerations the appeal inspector considering conjoined appeals for development at Daventry in 2009 advised that the Monksmoor development could be delivered provided improvements to the Weedon A5/A45 crossroads were in place. This junction improvement would provide capacity for the Monksmoor development at 1,000 dwellings and a further 1,250 dwellings could be delivered at Daventry before the delivery of a Flore/ Weedon bypass.

The conjoined appeal inquiry identified that a phase 1 delivery of development at Daventry North East SUE would be achievable with Weedon A5/A45 junction improvements in place. The delivery of the remaining development (circa 750 by 2026 and a further 2,000 dwellings post 2026) would be dependent on the delivery of a bypass. The conjoined appeal decision in 2009 concluded that the bypass must in part be publicly funded as it is required as a response to existing growth. Indications when aligned with the JCS housing trajectory are that the bypass will not be required until the latter part of the plan period.

The A45 improvements comprise a junction improvement at the A5/ A45 crossroads at Weedon at an estimated cost of £0.95m and a new Daventry Development Link which will serve as a bypass to the villages of Flore and Weedon at an estimated cost of £27m. Northamptonshire County Council is actively seeking public funding for the bypass through major scheme funding. This funding will be supported by developer contributions from the Daventry North East SUE and potentially through the Community Infrastructure Levy.

The JPU agrees that the policy is overly restrictive in relation to retail development requirements and that the masterplanning process involving open public engagement will be the preferred process for directing detailed development issues. The JPU considers that retailing facilities of a local nature and scale consistent with a local centre will still be appropriate. Policy S9 requires retail development over 1,000 sqm gross to be subject to impact assessment.

The supporting text to Policy D3 suggests that development of the SUE should commence from the south western edge however the JPU agrees a degree of flexibility is required to respond to site circumstances.

The JPU together with the developer has reassessed the rate of delivery of housing development in relation to the site and agree that given the economic circumstances currently prevailing and the remaining number of years to implement the plan to 2026 a realistic delivery of housing from the site would be in the region of 2,000 dwellings. However, should economic circumstances alter more quickly than anticipated or more sharply then more housing could potentially be delivered. Hence a degree of flexibility is required in the policy wording to account for this.

The Monksmoor development is now at an advanced stage with developers on board and discussions regarding S106 and reserved matters applications. Early delivery is anticipated. The development is included within the housing trajectory

and in the increasingly unlikely event that the consent should lapse its previous consent and inclusion as a commitment within the JCS are material considerations. It is not considered that the inclusion of the Monksmoor Farm development is necessary within Policy D3.

The allocation of land at Holly Lodge Drive, Northampton for 1,000 dwellings whilst within Daventry District Council area would not support the housing needs of Daventry town or its town centre regeneration. The inclusion of such an allocation, which it is proposed would delay any development at Daventry North East SUE until post 2021, is not considered a sustainable option for Daventry town.

An allocation for SUE development at Mickewell Park in the form of a Daventry North SUE was considered within the Emergent Joint Core Strategy as was an allocation for SUE development at the South East of Daventry, however, neither were taken forward into the Pre Submission Joint Core Strategy. During the course of plan preparation it became evident that the scale of development as required by the Regional Spatial Strategy (RSS) could not be delivered within the plan period to 2026 due largely to the economic downturn. Consequently, the scale of development as required by the RSS has been reduced in the JCS in line with a deliverable projection and reflecting local needs. The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. Following further consideration, including a review of the representations and in the light of the reduced delivery for West Northamptonshire, as well as in comparison to the potential for allocation at Daventry North East the JPU continues to consider that there is evidence to show that Daventry North and Daventry South East SUEs are less sustainable locations than other options.

The JPU agrees to the addition of wording in the supporting text to the policy noting required sympathetic treatment of development at the country park edge. This will in addition be part of the masterplanning process. The JPU also agrees to the addition of wording to inform that the Daventry reservoir is designated as a Conservation Area and is a designated Local Nature Reserve.

Northamptonshire County Council as education provider has advised that three new primary schools will be required to serve the full development allocation to 4,000 dwellings, however the number of schools places has been removed from the policy to allow for detailed consideration as the development is delivered. The number of places is however within Infrastructure Delivery Plan Update 2012 as the best information available at this time. The schools will be provided by the developer and NCC where the number of school places exceeds the requirement of the SUE.

Reference to job numbers in Policy T3 is proposed to be deleted from the JCS.

The transport links associated with the development of the SUE will follow the framework set in the JCS policy. A detailed transport plan to support a planning application will be considered by Northamptonshire County Council as highway authority. This will give detailed consideration to the frequency of bus services, station facilities at Long Buckby, traffic calming and road safety. The developer will be required to make relative and appropriate contributions according to the impact of the development.

The phasing of infrastructure delivery will be determined in detail through the masterplanning and planning application processes, and will be secured by both planning conditions and S106 planning agreements. The phasing of key elements of infrastructure are indicated in the Infrastructure Delivery Plan and are largely dependent on the delivery of housing and other development it is intended to support. The need for Waste water Treatment Works (WwTW) up-grade is highlighted in the Infrastructure and Delivery section of the plan at Table 7 which refers to Key Primary Infrastructure Projects. This refers to improvements to Whilton WwTW required to commence in 2013. In fact these works have already commenced and will be completed by 2012. The main trunk sewer from Daventry to Whilton WwTW was considered to have some capacity issues at the 2009 Daventry appeals inquiry however, the co-joined appeal proposals had a higher housing delivery (10,000 dwellings) than that to be provided through the current JCS (which provides for approximately 2,000 dwellings to 2026). AWS is reviewing trunk sewer capacity.

Landscape matters connected with the allocation of Daventry North East SUE have been fully considered as presented in supporting paragraphs to Policy D3 at 13.24 to 13.27. Policy BN5, The Historic Environment, of the JCS requires all development to demonstrate an appreciation and understanding of development on surrounding heritage assets and their setting, and be sympathetic to locally distinctive landscape features.

Recommended Action

That the supporting text, policy and proposals map inset be amended as set out in the following Proposed Changes:

PC016/D
PC017/D
PC018/D
PC019/D
PC020/D
PC021/D
PC022/D
PC023/D
PC024/D
PC025/D
PC026/D
PC027/D
PC028/D
PC029/D
PC030/D
PC010/MK

13.0 Daventry

82. Policy D4 – Supporting Areas of Community Regeneration

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy D4 – Supporting Areas of Community Regeneration: Southbrook	1	1	0	1	0	0	0	0	0

Summary of issues raised by Respondents

- The respondent considers the JCS should be sufficiently flexible to allow for areas to be identified for regeneration that are not currently identified, for example where indices of deprivation change over time or places deteriorate over time against such indicators.

Joint Planning Unit Response to Representations

Policy RC1 allows for other areas to be identified for community regeneration following assessment.

Recommended Action

No change recommended in relation to issue raised by respondent, however one change in response to updated information as set out Proposed Change:

PC031/D

13.0 Daventry

83. Policy D5 – Daventry Transport Network Improvements

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy D5 – Daventry's Transport Network Improvements	9	9	0	3	6	3	3	0	0

Summary of issues raised by Respondents

- The respondent considers greater clarity is required on how the A45 scheme is expected to be funded, when it is likely to be implemented and the interaction between delivery of the scheme and phasing of development in Daventry.
- The respondent considers that Paragraph 13.35 implies improvements to the A45 Northampton to Daventry highway corridor arise solely as a consequence of the development of the Daventry North East SUE whereas the need for such improvements does not arise solely as a result of the SUE. The respondent considers Paragraph 13.35 should be reworded to make this clear.
- The respondent considers reference should be made in the supporting text to the policy to protecting corridors for future advanced public transport system(s), to be defined in the Masterplan and Daventry DPD. The respondent further considers reference to the A45 should be clarified that this means to junction 16 of the M1.
- The respondent considers a railway station at Weedon should be reinstated.
- The respondent considers there is poor disabled access at Long Buckby Railway Station and public transport to the station needs to be improved.
- The respondent considers use of red ways and underpasses should be adopted for the whole of Daventry like Milton Keynes.
- The respondent considers the cycling network requires improvement.
- The respondent considers links to DIRFT should be improved.

Joint Planning Unit Response to Representations

An appeal inspector considering conjoined appeals for development at Daventry in 2009 advised that the Monksmoor development could be delivered provided highway improvements to the Weedon A5/A45 crossroads were in place. This junction improvement would provide capacity for the Monksmoor development at 1000 dwellings and a further 1,250 dwellings could be delivered at Daventry before the delivery of a Flore/Weedon bypass.

The conjoined appeal inquiry identified that a phase 1 delivery of development at Daventry North East SUE would be achievable with Weedon A5/A45 junction

improvements in place. The delivery of the remaining development (circa 750 by 2026 and a further 2,000 dwellings post 2026) would be dependent on the delivery of a bypass. The conjoined appeal decision in 2009 concluded that the bypass must in part be publicly funded as it is required as a response to existing growth. Indications when aligned with the JCS housing trajectory are that the bypass will not be required until the latter part of the plan period.

The A45 improvements comprise a junction improvement at the A5/A45 crossroads at Weedon at an estimated cost of £0.5m and a new Daventry Development Link which will serve as a bypass to the villages of Flore and Weedon at an estimated cost of £27m. Northamptonshire County Council is actively seeking public funding for the bypass through major scheme funding. This funding will be supported by developer contributions from the Daventry North East SUE and potentially through the Community Infrastructure Levy.

For clarity Paragraph 13.35 is proposed to be reworded to remove any perceived implication that the A45 Northampton to Daventry highway corridor improvements arise solely as a consequence of the development of the Daventry North East SUE.

At present there is no identified and costed scheme for future advanced public transport systems for Daventry that are indicated as deliverable in the plan period. In this respect it is premature to define and protect corridors which could subsequently be blighted and where the Council could be open to claims of compensation by land owners.

There are no plans for the reinstatement of a rail station at Weedon. The cost of this infrastructure is likely to be high and unlikely to represent best value for money.

The Infrastructure Delivery Schedule that supports the JCS identifies a requirement for improvements to facilities at Long Buckby Station. Improvements to Long Buckby Station are currently referred to within the policy. Improvements may be delivered and funded by Network Rail and Northamptonshire County Council.

The policy also presently refers to the completion of the cycling network in Daventry town. These are provisionally costed at £2.35m by the County Council through their Cycling Development Plan for Daventry.

Policy E4 Daventry International Rail Freight Terminal (DIRFT) refers to the support for associated road infrastructure. A detailed planning application for DIRFT III will be considered in the future by the Major Infrastructure Planning Unit.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC032/D

PC033/D

14.0 Towcester

84. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	3	3	0	3	0	0	0	0	0

Summary of issues raised by Respondents

Introduction

- Both representations are supportive of the JCS.

Towcester Masterplan

- A respondent comments that this section needs updating to reflect the final Masterplan.

Joint Planning Unit Response to Representations

It is accepted that the introductory text needs to be updated to reflect the final adopted version of the Towcester Masterplan.

Recommended Action

That the introductory text be amended as set out in Proposed Change:

PC001/T

14.0 Towcester

85. Policy T1 – Spatial Strategy for Towcester

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy T1 – Spatial Strategy for Towcester	9	8	1	3	6	2	4	0	0

Summary of issues raised by Respondents

- One respondent is seeking a minor amendment to include consideration of surface water management in the policy.
- One respondent expresses concern that there is no specific reference to the need for investment in Acute Healthcare to meet planned infrastructure growth.
- Respondents express support for references to the Towcester South SUE and Towcester Racecourse in the policy.
- Respondents express concern that the route of the bypass remains unclear. Alternative proposals are suggested which would involve a link to the existing Whittlebury junction, avoiding the cost of creating a new junction on the A43.
- Respondents argue that further evidence is required to demonstrate that the transport infrastructure implications have been fully considered, including the consideration of alternatives, to confirm that the most appropriate scheme has been identified and that infrastructure requirements can be met in a timely manner.

Joint Planning Unit Response to Representations

Surface water management is dealt with in Policy BN7 – Flood Risk and as such does not need to be repeated in this Policy.

The specific needs for additional Acute Healthcare provision arising for the development at Towcester have not been identified by the respondent. Where infrastructure requirements are identified these are addressed in the Infrastructure Delivery Plan.

The proposed A5 relief road will be delivered as an integral part of the Towcester South SUE (Policy T3). The Towcester Transport Study has identified a preferred transport mitigation strategy which comprises:

- A link road between the A5 and the A43 to the south-east of Towcester;
- A new junction onto the A43 south of the Abthorpe roundabout junction;
- Improvement works to the existing roundabout junctions at Abthorpe and Tove; and
- Measures to control speeds through Towcester on the current A5.

This 'preferred transport strategy' can accommodate both the level of development proposed within the Joint Core Strategy plan period and the full quantum of development allocated to the south of Towcester. Changes are proposed to the site allocation boundary for the Towcester South SUE to reflect the preferred strategy identified in the Towcester Transport Study.

Minor changes are required to refer to the 'relief road' rather than 'bypass', to ensure a consistency of wording between the JCS, the Towcester Masterplan and the Towcester Transport Study.

Recommended Action

That the supporting text and policy be amended as set out Proposed Change:

PC002/T

PC003/T

14.0 Towcester

86. Policy T2 – Town Centre and Moat Lane Regeneration Area

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy T2 – Town Centre and Moat Lane Regeneration Area	2	2	0	1	1	0	0	1	0

Summary of issues raised by Respondents

- One respondent suggest a minor wording change to last bullet point of Policy T2 so that it would read: [development will provide:] ‘The preservation and enhancement of the conservation area and the setting of the town centre’s heritage assets.’
- One respondent seeks a minor amendment to include consideration of surface water management in the policy.

Joint Planning Unit Response to Representations

The minor wording change relating to the conservation area and the town centre’s heritage assets is acceptable and should be included in the Schedule of Proposed Changes.

Surface water management is dealt with in Policy BN7 – Flood Risk and as such does not need to be repeated in this Policy.

Recommended Action

That the policy be amended as set out in Proposed Change:

PC004/T

14.0 Towcester

87. Policy T3 – Towcester South Sustainable Urban Extension

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy T3 – Towcester South Sustainable Urban Extension	22	21	1	4	18	6	10	2	0

Summary of issues raised by Respondents

- Representations from local residents/ residents groups raise the following concerns:
 - Scale of growth is totally unjustified;
 - Unsustainable development which will exacerbate the housing/employment balance;
 - No realistic prospect of the anticipated level of employment development being delivered;
 - The development will not be integrated into the town and is too far from the town centre;
 - Viability of the scheme to deliver physical and community infrastructure is not proven;
 - Wood Burcote is a separate and distinct settlement and it would be illegal for it to be enclosed by development from the neighbouring town; and
 - Some of the land earmarked for development is subject to flooding which is not acknowledged in the Flood Risk Assessment.

- One respondent seeks greater recognition for the designated heritage assets which adjoin the site and the potential setting issues. Additional wording is proposed for inclusion in the policy to deal with the setting of Easton Neston registered park and garden, listed buildings and nearby conservation areas.

- The provision of A5 Bypass is a consistent theme raised by respondents with the following key issues being raised:
 - Reliable funding should be in place before the SUE is confirmed.
 - The promoted road line has not been subject to consultation and alternatives have not been considered.
 - The Towcester Transport Study has not been completed or published for public scrutiny.
 - The optimal route for the bypass has not been chosen. An alternative is promoted which would link to the existing Whittlebury junction, provide the

missing slip roads for Silverstone and other villages and open up additional land for economic development.

- Concern is expressed that the provision of the bypass and traffic restraint in the town centre will have a substantial impact on the A43. It is essential therefore that all the implications have been fully considered and that infrastructure requirements can be met.
- One respondent is seeking changes to the proposal for a new town park to make it clear that it requires enabling housing and transport development to make it happen. The owners of the land support the creation of the park but object to its designation as Strategic Green Space. They are seeking changes to wording to reflect their view that the site provides an important linkage between the town and the SUE, but is not a focal point for the development itself.
- One respondent supports the policy relating to the Towcester SUE but is seeking the following focused changes:
 - The policy should not restrict the rate of delivery to a cap, or ceiling, of 1500 dwellings, as additional dwelling completions may take place during the plan period;
 - The capacity of the site should be “up to 3,000 dwellings”;
 - Policy should not seek to cap the job numbers during the plan period and should use the area of land to be provided rather than job numbers in line with the other SUEs;
 - The floorspace allowance for convenience retail should be increased to 2500 sqm;
 - Town Park is not required in the respondent’s view as part of SUE and should be promoted as an entirely separate proposal;
 - Reference should be made to comprehensive development and realistic contributions to infrastructure delivery having regard to viability;
 - Reference to enhanced utility provision is not justified; and
 - T3 should refer to provision of ‘sites’ for schools, other contributions are still subject to negotiation.
- Respondents seek greater flexibility towards retail development on the site including the deletion of the 500sqm floorspace limit.
- Respondents are also promoting the allocation of additional land to the south and west of the SUE, including land at Burcote Wood Farm, and Green Lane Nurseries.
- One respondent considers that the policy should refer to the specific inset map on which the SUE boundaries are shown.
- One respondent suggests the following wording change: ‘The development should mitigate its impact on the transport network through measures including:’

Joint Planning Unit Response to Representations

The Towcester South SUE has been included within the Pre-Submission JCS as a refinement of the preferred location for development identified in the Emergent Joint Core Strategy (EJCS). This location was chosen following a robust assessment of all the reasonable development options for Towcester against a range of criteria relating

to suitability, availability and achievability. No additional evidence has emerged in the responses to the PSJCS to suggest that this should no longer be the preferred option.

The scale of growth is consistent with the overall development needs of South Northamptonshire and reflects the preferred spatial strategy of concentrating additional development within the existing towns as far as possible and in a small number of large development areas, called sustainable urban extensions. The extent of the site will enable the delivery of the A5 relief road, but also ensure that the site is accessible to and will support the regeneration of the town centre. The provision of strong and sustainable links to the town centre is a key feature of the policy.

The policy seeks to strike a balance between employment and housing provision and requires a minimum level of employment land to be delivered alongside the housing development during the plan period. It is expected that the delivery of employment land will be phased alongside the housing, but this is a matter for detailed master planning and development management. Changes are proposed to the supporting text to provide further information regarding the employment development on the site.

No convincing evidence has been submitted to substantiate claims that the required physical and community infrastructure is not viable. Developers are continuing to pursue an outline planning application for the site, supported by a comprehensive master plan. The Infrastructure Delivery Plan has identified the costs and funding sources for the infrastructure requirements.

Wood Burcote is recognised as being an attractive landscape within an area of high landscape sensitivity. The new development will protect the setting of Wood Burcote and ensure that appropriate green infrastructure corridors and other links are provided. These areas will allow the built form to be assimilated into the landscape.

Flood risk is addressed through Policy T3 which outlines that the Towcester South SUE will provide *“Flood risk management, including surface water management from all sources”*.

It is accepted that greater recognition for the designated heritage assets which adjoin the site and the potential setting issues could be included in the policy. To this end additional wording is proposed for inclusion in the policy to deal with the setting of Easton Neston registered park and garden, listed buildings and nearby conservation areas.

The proposed A5 relief road which will be delivered as an integral part of the Towcester South SUE (Policy T3) is fully justified by the evidence set out in the Towcester Transport Study. This study has identified a preferred transport mitigation strategy, following the consideration of alternative options, which comprises:

- A link road between the A5 and the A43 to the south-east of Towcester;
- A new junction onto the A43 south of the Abthorpe roundabout junction;
- Improvement works to the existing roundabout junctions at Abthorpe and Tove; and
- Measures to control speeds through Towcester on the current A5.

This 'preferred transport strategy' can accommodate both the level of development proposed within the Joint Core Strategy plan period and the full quantum of development allocated to the south of Towcester. Changes are proposed to the site allocation boundary for the Towcester South SUE to reflect the preferred strategy identified in the Towcester Transport Study. Minor changes are also required to refer to the 'relief road' rather than 'bypass', to ensure a consistency of wording between the JCS, the Towcester Masterplan and the Towcester Transport Study.

It is recognised that further clarity could be provided within the supporting text and the policy regarding the delivery of the town park. Changes are therefore proposed which acknowledge the role of enabling development to deliver the town park and that this development can be subject to a separate application from the main SUE.

The following changes proposed in representations are considered to be acceptable:

- Express 1,500 dwellings, as a minimum figure to enable additional dwelling completions to take place during the plan period;
- A minor reduction in the capacity of the site to 3000 dwellings to reflect market conditions;
- Employment provision to be expressed as a site area and delivery expressed as a minimum figure; and
- Reference to enhanced utilities provision is deleted as it is recognised that such provision must be directly related to the development.

As regards the other changes suggested these are not accepted for the following reasons:

- The limit on convenience floorspace is justified by the evidence set out in the South Northamptonshire Retail Study. The larger floorspace limit that is being sought is likely to have an adverse impact on the town centre;
- The wording relating to education provision is appropriate and consistent with other SUE policies; and
- The wording of the policy already refers to a masterplan and infrastructure delivery and as such requires a comprehensive approach to development. Introducing viability into the wording would be inconsistent with the other SUE policies.

The extension of the allocated site further south is not considered appropriate for the following reasons:

- It would necessitate development beyond the line of the relief road, which would then be disconnected from the existing urban area and the town centre.
- Alternatively the relief road would have to be moved further south, which would reduce its effectiveness in terms of the relief it would provide to the A5 and the town centre.
- Further greenfield development in this location is not justified or sustainable.

The wording change suggested regarding mitigation of impact on the transport network is proposed for incorporation into Policy C2 and does not need to be repeated in each of the SUE policies.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC005/T

PC006/T

14.0 Towcester

88. Policy T4 – Transport Improvements for Towcester

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy T4 – Transport Improvements for Towcester	2	2	0	1	1	0	1	0	0

Summary of issues raised by Respondents

- One respondent considers that the first bullet point should include connectivity to Brackley and surrounding communities.
- One respondent supports the reference to the A5 bypass.

Joint Planning Unit Response to Representations

The policy highlights connections to the key employment destinations for residents in Towcester, but would not exclude improving connectivity to Brackley as it applies to the wider A43 network.

Minor changes are required to refer to the 'relief road' rather than 'bypass', to ensure a consistency of wording between the JCS, the Towcester Masterplan and the Towcester Transport Study.

Recommended Action

That the policy be amended as set out in Proposed Change:
PC007/T

14.0 Towcester

89. Policy T5 – Towcester Racecourse

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy T5 – Towcester Racecourse	3	3	0	1	2	0	1	1	0

Summary of issues raised by Respondent

- One respondent notes that the site is almost entirely within the Grade II* registered park and garden and as a consequence the following changes to the policy are sought:
 - Specific requirement for a development brief to be prepared;
 - Bullet point 5 to be strengthened to ensure that the significance of the heritage assets is not adversely affected, including a consequential change to bullet point 6; and
 - The supporting text should include additional wording to reflect the significance of the heritage assets which are affected.
- One respondent supports the inclusion of the policy, but is seeking the following changes to the policy and supporting text to provide greater flexibility:
 - Inclusion of a specific objective to acknowledge the opportunity to create a regional or national facility;
 - The requirement to meet ‘all’ the criteria should be replaced by meeting ‘any of the following criteria’;
 - Other forms of development which support the future of the racecourse should be considered; and
 - Access should be primarily from the A5, but not exclusively.

Joint Planning Unit Response to Comments

The changes suggested by the respondent relating to the site’s status as a registered park and garden are justified in order to acknowledge the heritage assets within the site and the need for development to take account of these.

The other suggested changes would provide an unreasonable degree of flexibility to the extent that development permitted by the policy could be unsustainable. For example, all the criteria within the policy are important and justified and to suggest that only one of the listed criteria should be met would be unreasonable.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC008/T
PC009/T
PC010/T
PC011/T

15.0 Brackley

90. Introductory Text

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	5	4	1	4	1	0	1	0	0

Summary of issues raised by Respondents

Introduction

- One supportive representation. No other significant issues raised.

Brackley Masterplan

- One respondent considers that Brackley is unsuitable for and cannot sustain the proposed developments for the following reasons:
 - The secondary school is oversubscribed;
 - Existing roads cannot take the increase in traffic;
 - Few jobs are available;
 - There are numerous empty shops which previous development has not helped;
 - Views of local residents have not been considered; and
 - The document is factually untrue and does not reflect the lack of infrastructure.
- One respondent considers that capacity and congestion issues on the A422 should be referred to in this section.
- One respondent notes that the section requires updating to reflect the final masterplan.

High Speed Rail

No representations received.

Joint Planning Unit Response to Representations

The supportive representation is noted and welcome.

The scale and nature of growth proposed at Brackley is considered to be appropriate having regard to its role as a Rural Service Centre. The development proposals have been subject to comprehensive assessment including sustainability appraisal and provision is made for the infrastructure needs arising from the development proposals. The Sustainability Appraisal has identified a number of positive effects arising from the Brackley policies. Significant positive effects were identified in

relation to education and training, health and well being, labour market and economy; material assets, population and social deprivation. The provision of sustainable growth to the north and east of the town will strengthen the town's role as a service centre and will be complemented by the revitalisation of the town centre through the Brackley Business District.

The Brackley Masterplan was subject to public consultation as part of its preparation and changes were made between the consultation draft and final versions having regard to responses received. It is recognised that this section of the JCS needs to be updated to reflect the final adopted version of the Brackley Masterplan.

In respect of High Speed Rail, although no representations were received there is a need for a minor factual update to reflect the current status of the scheme.

Recommended Action

That the Introductory text be amended as set out in Proposed Changes:

PC001/B
PC002/B
PC003/B
PC004/B

15.0 Brackley

91. Policy B1 – Spatial Strategy for Brackley

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy B1 – Spatial Strategy for Brackley	9	9	0	6	3	1	1	1	0

Summary of issues raised by Respondents

- One respondent expressed concern regarding the absence of any recognition of the historic importance of the town centre. They consider that the text should encourage heritage led regeneration in the town centre and the following wording should be added to the third bullet point of the policy: ‘Development in the town centre should conserve its historic character.’
- A respondent promoting an alternative site to the west of Brackley considers that the proposals are not the most appropriate strategy for the town when considered against reasonable alternatives. They claim that the SA is flawed.
- One respondent claims that there is a shortfall in housing provision in Brackley of 700 dwellings which should be met either by allocating one or more additional SUEs or by reallocating part of the requirement to the rural area.
- A minor amendment is sought by one respondent to include consideration of surface water management in the policy.
- One respondent expresses support for the policy which identifies the town as a focus for growth.

Joint Planning Unit Response to Representations

It is accepted that the supporting text to this policy could make reference to the opportunities offered by the historic character of the town centre to promote heritage led regeneration.

The Spatial Strategy for Brackley, in particular the proposed SUEs at Brackley North and Brackley East, is essentially a refinement of the preferred options set out in the Emergent Joint Core Strategy. The alternative site to the west of Brackley was one of the options that were considered and rejected in the EJCS. The reasons for rejection are clearly set out in the EJCS and it is considered that the Brackley West options remain less preferable than the SUEs that have been included in the Pre-Submission JCS. The SA concludes that *‘The Brackley policies will have a positive impact on most of the SA objectives through the provision of sustainable growth to the north and east of town, development which would strengthen the town’s role as a service centre, revitalisation of the town centre through the Brackley Business District and sensitive development which protects the town’s landscape setting.’*

The alleged 700 dwelling shortfall does not take into account the 420 dwellings that were completed in Brackley between 2001 and 2010. This leaves 280 dwellings which it is expected will come forward through urban capacity on sites identified within the SHLAA.

Surface water management is dealt with in Policy BN7 – Flood Risk of the Joint Core Strategy and as such does not need to be repeated in this Policy.

Some minor updating is required to the supporting text and policy to reflect the adoption of the Brackley Masterplan, changes to the Local Development Scheme, and to assist users of the plan by referring to specific Inset Maps.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC005/B

PC006/B

PC007/B

15.0 Brackley

92. Policy B2 – Brackley East Sustainable Urban Extension

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy B2 – Brackley East Sustainable Urban Extension	9	5	4	1	8	2	3	2	1

Summary of issues raised by Respondents

- The following wording is proposed by a respondent for inclusion within the policy: ‘Archaeological and ecological assessment of the site and required mitigation.’
- One respondent broadly supports the policy relating to the Brackley East SUE, but is seeking the following changes:
 - The policy should recognise that permission exists for the employment area to the north of Turweston Road and the remainder of the area should be allocated for housing.
 - There is no evidence to suggest why the site will not come forward until 2021-2026. A planning application has been submitted and the development will create links to the rest of the town that the northern SUE will rely on. It should therefore be brought forward early in the plan period.
- One respondent considers the policy is sound provided that bus provision is adequate. They assume that the Highways Agency have been consulted and commented regarding impacts on the A43, M40 and A34.
- One respondent proposes following minor wording change: ‘The development should mitigate its impact on the transport network through measures including:’

Joint Planning Unit Response to Representations

The wording proposed in respect of archaeological and ecological assessment is acceptable and would be consistent with the other SUE policies.

It is recognised that the employment area has been granted planning permission and the supporting text should be updated to reflect this.

It is also recognised that significant progress is now being made in respect of the proposed housing development to the south of Turweston Road such that the anticipated phasing of the site can be brought forward. This should be reflected in the supporting text.

The wording change suggested regarding mitigation of impact on the transport network is proposed for incorporation into Policy C2 and does not need to be repeated in each of the SUE policies.

Other minor changes are required to ensure consistency of wording with other SUE policies.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC008/B

PC009/B

PC010/B

15.0 Brackley

93. Policy B3 – Brackley North Sustainable Urban Extension

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy B3 – Brackley North Sustainable Urban Extension	8	8	0	3	5	2	2	1	0

Summary of issues raised by Respondents

- The following wording is proposed by a respondent for inclusion within the policy: ‘Archaeological and ecological assessment of the site and required mitigation.’
- A respondent is seeking the deletion of the Radstone Fields component of the Brackley North and its replacement with a residentially led mixed use scheme for West of Brackley. Respondent requests that these changes should be made through a review of the SA and consequential changes being made in advance of any examination. It is submitted that the key argument to support the inclusion of Brackley North SUE is the provision of a link to Northampton Road which will facilitate access to the strategic road network which makes the Brackley North SUE less sustainable than development to the West, and that this has not been properly considered through the SA.
- One respondent supports the policy on the grounds that the site represents the most logical and well related option for an SUE.
- Respondents are seeking greater flexibility towards retail development on the site including the deletion of the 500sqm floorspace limit.
- One respondent considers the policy is sound provided that bus provision is adequate. They assume that the Highways Agency have been consulted and commented regarding impacts on the A43, M40 and A34.
- One respondent proposes the following minor wording change: ‘The development should mitigate its impact on the transport network through measures including:’

Joint Planning Unit Response to Representations

The wording proposed in respect of archaeological and ecological assessment is acceptable and would be consistent with the other SUE policies.

The Brackley North SUE is essentially a refinement of the preferred option set out in the Emergent Joint Core Strategy. The alternative site to the west of Brackley was one of the options that were considered and rejected in the EJCS. The reasons for

rejection are clearly set out in the EJCS and it is considered that the Brackley West option remains less preferable than the SUEs that have been included in the PSJCS. The SA has properly assessed and considered the impacts of the Brackley North SUE and no significant effects were identified. Conversely a number of significant positive effects were identified.

Policy B3 does include provision for a road link between Halse Road and Northampton Road. The primary function of this link is to ensure connectivity across the whole development site and to relieve pressure on the local road network, rather than facilitate direct access to the strategic road network. It will also assist connectivity to the employment development proposed as part of the Brackley East SUE and the main route into the town centre. A change to the supporting text is proposed to explain why the link road would be beneficial and to reflect the position established through the consideration of planning applications for Radstone Fields and the Sawmills site. The policy also requires an integrated transport network with sustainable transport modes including access to the town centre, which will help to reduce travel out of Brackley.

The policy seeks to limit the overall scale of retail development on the site in order to ensure that it will be consistent with the role of a local centre within the SUE and not undermine the vitality and viability of the town centre. This approach is justified by local evidence set out in the South Northamptonshire Retail Study. The relaxation sought in representations would not be consistent with the objective of revitalising the town centre.

The wording change suggested regarding mitigation of impact on the transport network is proposed for incorporation into Policy C2 and does not need to be repeated in each of the SUE policies.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC011/B
PC012/B
PC013/B

15.0 Brackley

94. Policy B4 – Transport Improvements for Brackley

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy B4 – Transport Improvements for Brackley	3	3	0	1	2	1	1	0	0

Summary of issues raised by Respondents

- A respondent promotes an alternative site to the west of Brackley and considers that the proposals, including Policy B4, are not the most appropriate strategy for the town when considered against reasonable alternatives. They claim that the SA is flawed.
- One respondent supports the policy, but suggests that the policy needs an emphasis on public transport links serving the town and local villages to Oxford, Banbury, Bicester, Buckingham and Northampton.
- One respondent considers the policy is sound provided that bus provision is adequate. They assume that the Highways Agency have been consulted and commented regarding impacts on the A43, M40 and A34.

Joint Planning Unit Response to Representations

The Spatial Strategy for Brackley, in particular the proposed SUEs at Brackley North and Brackley East, is essentially a refinement of the preferred options set out in the Emergent Joint Core Strategy. The alternative site to the west of Brackley was one of the options that were considered and rejected in the EJCS. The reasons for rejection are clearly set out in the EJCS and it is considered that the Brackley West options remains less preferable than the SUEs that have been included in the Pre-Submission JCS. The SA concludes that *'The Brackley policies will have a positive impact on most of the SA objectives through the provision of sustainable growth to the north and east of town, development which would strengthen the town's role as a service centre, revitalisation of the town centre through the Brackley Business District and sensitive development which protects the town's landscape setting.'*

It is considered that the policy as worded, together with the supporting text places sufficient emphasis on improving public transport connections through reference to the wider A43 network and inter-urban services. The further detail suggested, whilst unobjectionable, is not necessary.

Recommended Action

That no changes be made.

16.0 Rural Areas

95. Introduction

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	11	11	0	8	3	1	1	1	0

Summary of issues raised by Respondents

- Respondents support the content of the JCS in relation to the rural areas.
- Respondents consider that there should be explicit recognition of the status of the village of Great Houghton as a discrete village within Northampton Borough.
- One respondent considers that whilst the section acknowledges the need to increase housing supply in rural areas, the failure to define a settlement hierarchy is criticised for failing to address shortfall in housing provision in Daventry District, in particular.
- One respondent is concerned that the last two sentences of Paragraph 16.4 are misleading regarding the amount of power that will be available to rural communities.

Joint Planning Unit Response to Representations

The support for this section is noted.

Further explanation of the status of Great Houghton is not considered necessary within the strategic context of the JCS. The proposed Local Plan for the Northampton Related Development Area can provide this detail if required.

Housing requirements for the rural areas, including Daventry District, are clearly defined in Policy S3 of the JCS, and whilst the Rural Areas section of the Joint Core Strategy does not define a specific hierarchy Policy R1 provides a clear framework for the definition of the hierarchy in the Local Plans that are being prepared for Daventry District and South Northamptonshire. This will enable a range of needs to be met in rural areas, including housing. A clear programme has been established for the preparation of the relevant Local Plans through in the Revised Local Development Scheme (June 2012), and development will continue to occur in the rural areas in accordance with saved Local Plan policies and interim policy arrangements.

It is accepted that Paragraph 16.4 would benefit from some updating now that government policy has been more clearly expressed in the National Planning Policy Framework.

Recommended Action

That the section be amended as set out in Proposed Change:

PC001/R

16.0 Rural Areas

96. Policy R1 – Spatial Strategy for the Rural Areas

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy R1 – Spatial Strategy for the Rural Areas	125	112	13	60	65	20	30	14	1

Summary of issues raised by Respondents

- The overall approach set out in the policy is supported by a significant number of Parish Councils, community groups and local residents.
- There are however concerns raised by community representatives which are summarised below:
 - Concerns regarding the % growth limits specified in the policy – some consider that they are too large and would allow villages to grow beyond their service capacity. Also concerned that they have not been justified by evidence;
 - A more sophisticated approach is required taking into account criteria such as the ability of a village to remain sustainable, the local demand for housing and environmental constraint;
 - Definition of a hierarchy based on service provision should be dropped in favour of a more ‘ad hoc’ approach looking at villages where population growth could provide new facilities;
 - More flexibility should be given to local communities to determine which services and facilities are most important for their area, and to decide the levels of growth that are appropriate;
 - The explanatory text focuses too heavily on service provision as the key determinant of the hierarchy. This is inconsistent with the policy which specifies other factors;
 - Greater emphasis should be given to the role of communities in determining the hierarchy and the policy approach needs to be consistent with the provisions of the Localism Bill;
 - Concern is expressed that residents do not know which category their village will be in, and respondents also set out reasons why individual villages should or shouldn’t be in a particular category;
 - The policy should ensure that development is permitted only where this meets local needs and supports local services; and
 - Some concern that aspects of the policy may be too restrictive in terms of meeting the needs of rural areas.
- There is also a body of representations from the development industry and landowners which challenge the soundness of the policy approach. Specific

criticisms focus on the absence of a hierarchy, the use of percentage targets, and the use of the 2006 base date. These are considered in more detail below.

Absence of a hierarchy

The failure to specify which villages fall into which category in the hierarchy is criticised by respondents for the following reasons:

- They consider that the housing requirement for the rural areas specified in Policy S3 will not be delivered;
- Core strategies should identify the principal locations for growth which includes the 'primary' and secondary service villages; and
- Respondents are seeking inclusion of specific settlements within the named hierarchy.

Use of percentage targets

These are criticised by respondents on the following grounds:

- Respondents think they are arbitrary and unjustified and should be deleted;
- It is not clear how they have been derived based on the housing requirement specified in Policy S3;
- A more sophisticated approach is sought by respondents; e.g. one which is based on the availability of land, demand for and viability of new housing, the environmental capacity of the village, and community consultation on appropriate levels of growth; and
- The policy should be more flexible regarding the circumstances in which the % target could be exceeded.

2006 base date:

The use of this base date is challenged by respondents for the following reasons:

- It is not justified by evidence;
- It is 'out of date' and will not help bring development forward in the future; and
- The base date should be consistent with the anticipated adoption date of the plan.

Other criticisms of the policy from respondents include:

- The restrictive nature of the policy which fails to meet the challenges facing rural areas as specified in the supporting text;
- Not consistent with national policy due to the absence of a positive and proactive approach based on evidence;
- Too much emphasis on the role of local communities which is likely to restrict development;
- Will result in inadequate provision of housing in the rural areas at least in the short to medium term;
- The reference to saved policies is inflexible, contrary to national policy and unnecessary;
- The criterion for the settlement hierarchy fails to acknowledge the need for a sustainable balance of homes and jobs and the importance of developing those settlements with potential to achieve that balance;

- Concerns regarding the use of the terms ‘small scale’ and ‘local need’ on the grounds that they are not defined and will restrict development; and
- Policy should recognise the economic benefits of renewable energy.

Joint Planning Unit Response to Representations

The significant level of support for the overall approach is noted and welcomed.

Concerns raised by Community Representatives

The analysis of services and facilities within settlements as an indicator of their relative sustainability is a well established methodology which has been widely used within development plans to inform settlement hierarchies. Policy R1 does however acknowledge that presence of services and facilities is not the only factor to be taken into account. Other factors include opportunities to enhance service provision, accessibility, local needs and environmental and infrastructure constraints. It is accepted that further reference to these other factors could be included within the explanatory text.

In line with the changes in national policy and the emphasis on localism it is accepted that further flexibility should be given to local communities to determine the services and facilities that they consider to be most important.

Some updating of the policy is required to reflect the provisions of the Localism Act and the National Planning Policy Framework.

Absence of a hierarchy

Housing requirements for the rural areas are clearly defined in Policy S3 of the JCS, and whilst the Rural Areas section of the Joint Core Strategy does not define a specific hierarchy Policy R1 provides a clear framework for the definition of the hierarchy in the Local Plans that are being prepared for Daventry District and South Northamptonshire. This will enable a range of needs to be met in rural areas, including housing. A clear programme has been established for the preparation of the relevant Local Plans through in the Revised Local Development Scheme (2012), and development will continue to occur in the rural areas in accordance with the saved Local Plan policies and interim policy arrangements.

This framework approach will allow a more sophisticated and fine-grained approach to be taken forward in the relevant Local Plans. This approach is very much in line with the localism agenda which is a key part of government policy.

Use of Percentage Targets

The use of percentage targets has attracted significant criticism both from those who feel they are too restrictive and those who think they are not restrictive enough. The purpose of using % limits is to ensure that the scale of growth in any individual settlement is consistent with the rural character and appropriate having regard to local needs. The emphasis on small scale development consistent with local needs reflects the feedback from extensive consultation with local communities. It also follows the approach adopted by South Northamptonshire Council in its Interim Rural Housing Policy which has been supported through appeal. It is considered that this approach is consistent with the National Planning Policy Framework (NPPF) which

expects local planning authorities to be responsive to local circumstances and plan housing developments to reflect local needs.

It is accepted however that some flexibility could be introduced by confirming that the % growth figures are indicative and also expressing them as being 'up to' rather than within a narrow range.

2006 Base Date

It is accepted that the base date for the policy should be amended to 2011 to be consistent with other aspects of the housing provision within the JCS.

Overall Conclusions

The overall approach set out in Policy R1 is considered to be justified and consistent with national policy, particularly the localism agenda. It is accepted however that the policy and supporting text would benefit from a series of changes as follows:

- To clarify the scale of growth that is required in the rural areas;
- To provide greater flexibility for local decisions by confirming that the percentage growth figures are indicative and expressing them as being "up to" rather than within a narrow range;
- To provide further clarification on the operation of the policy; and
- To reflect the introduction of Neighbourhood Plans in the Localism Act.

Recommended Action

That the supporting text and policy be amended as set out in Proposed Changes:

PC002/R
PC003/R
PC004/R
PC005/R
PC006/R
PC007/R
PC009/R
PC010/R

16.0 Rural Areas

97. Policy R2 – Rural Economy

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy R2 – Rural Economy	15	12	3	2	13	3	4	6	0

Summary of issues raised by Respondents

- Whilst there is a large measure of support for the policy in principle, the majority of representations are seeking changes which would provide greater flexibility and/ or suggest the inclusion of additional forms of development within the policy.
- The key changes sought by respondents to the policy are summarised below:
 - The policy should seek to enhance not just sustain the rural economy;
 - Greater flexibility is sought from the policy to permit residential re-use of rural buildings in accordance with national policy;
 - The policy should not restrict the expansion of businesses in their existing location. Expansion should be permitted for new firms in rural areas not just existing businesses – specific reference is made to Shacks Barn Farm, near Towcester;
 - The extension of rural buildings should be permitted as well as their re-use;
 - It is not necessary for diversification to contribute to the operation and viability of the farm holding;
 - Concern that the wording is too restrictive, specifically the use of the terms ‘small scale’ and ‘local need’, and may be used to prevent employment development. Use of the term ‘small scale’ is not consistent with national policy;
 - Reference should be made to ‘live/ work’ which is a particularly important and growing trend in rural areas;
 - The use of land for the development of renewable energy facilities should be supported. This is particularly important for farm diversification; and
 - Should include support and protection for village facilities and local economic needs.

Joint Planning Unit Response to Representations

It is accepted that the policy should seek to enhance as well as sustain the rural economy. This change would be consistent with national policy to support economic growth in rural areas.

The scope of the policy as drafted is considered to be appropriate and consistent with national policy as expressed in the National Planning Policy Framework.

Some of the additions to the policy which are sought by respondents are dealt with elsewhere in the JCS and do not need to be repeated here. For example renewable energy is dealt with in Policy S11, whilst the retention and development of village facilities is covered by Policy R1. Scope also exists to address more detailed issues such as the re-use of rural buildings, including their potential extension, and the potential for live-work units in the relevant Local Plans that will cover the rural areas of Daventry and South Northamptonshire Districts.

The link between farm diversification and the overall viability of farm holdings is a significant one. In addition to supporting the rural economy, diversification has an important role in maintaining the viability of agricultural holdings thus ensuring that the countryside is effectively managed and its character retained. It is important that this link is recognised within the policy.

The policy does provide opportunity for the establishment of new firms where development is of a small scale to meet local needs. This is consistent with the objective of promoting sustainable development within the rural areas. If large scale employment were to be encouraged this would lead to unsustainable patterns of development and potentially undermine the regeneration of urban areas. The approach also reflects the results of consultation with rural communities.

Recommended Action

That the Policy be amended as set out in Proposed Changes:

PC011/R
PC012/R

16.0 Rural Areas

98. Policy R3 – A Transport Strategy for the Rural Areas

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy R3 – A Transport Strategy for the Rural Areas	12	12	0	4	8	2	6	0	0

Summary of issues raised by Respondents

- Respondents offer some support for the policy, particularly the provision of ‘demand-led’ services, improving connections between villages and their nearest services and measures to reduce ‘rat-running’.
- Respondents consider that the policy should promote better information about transport. Accessibility should include access to information. It should also promote connections with places of employment.
- Respondents question the effectiveness of the policy in the light of Northamptonshire County Council’s budget cut to transport subsidies and the impact this will have on rural bus services.
- The following improvements to transport facilities are suggested by respondents:
 - Re-opening of Roade rail station;
 - Intermediate rail station at Brackley;
 - Bus interchange at Towcester; and
 - Improvements to disabled access at Long Buckby Station and associated public transport improvements.
- Specific concerns are raised regarding the capacity of the A43 corridor at Moulton.
- Respondents question the ability of the local authorities to improve connectivity and obtain funding is questioned. Particular concern is expressed regarding the A45 Flore-Weedon Bypass.
- One respondent claims that the excessive traffic experienced by villages such as Nether Heyford is not given significant weight in the document.

Joint Planning Unit Response to Representations

The support for the policy is noted and welcomed.

The importance of providing better information about transport is noted. This is referred to elsewhere in the JCS, at Policy C1, and does not need to be repeated here.

The implementation of improvements to rural transport is challenging in the current economic situation, but the principles of the policy remain valid. Greater use will need to be made of innovative solutions such as “demand” operated services.

It is not appropriate to include the specific improvements suggested by the respondents in the policy for the following reasons:

- The proposed railway stations at Roade and Brackley are not supported by any evidence that they would be viable and deliverable;
- The improvement of bus facilities at Towcester is dealt with in Policy T4; and
- The Infrastructure Delivery Schedule that supports the Joint Core Strategy identifies a requirement for improvements to facilities at Long Buckby Station. Improvements to Long Buckby Station are currently referred to within Policy D5 of the Joint Core Strategy. The specific improvements at Long Buckby Station are too detailed for inclusion within the Joint Core Strategy.

Issues relating to the A43 corridor and the A45 Flore/ Weedon Bypass are dealt with in the Connections section of the Joint Core Strategy.

The Infrastructure Delivery Plan sets out a range of schemes that will improve connectivity and identifies costs and funding sources for these.

The policy recognises the wider problems of traffic growth in rural areas, but it would not be appropriate to single out particular locations such as Nether Heyford.

No changes are required other than a minor factual update to reflect the fact that the Northamptonshire Transportation Plan has now been adopted.

Recommended Action

That the supporting text be amended as set out in Proposed Change:

PC013/R

17.0 Monitoring and Implementation Framework

99. Monitoring and Implementation Framework

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
17.0 Monitoring and Implementation Framework	13	10	3	4	9	4	3	2	0

Summary of issues raised by Respondents

Introduction

- A respondent considers the Pre-Submission JCS should contain a clear statement that infrastructure should be installed before major or cumulative development takes place.
- One respondent considers that the Pre-Submission version of the Joint Core Strategy should be supported by an up-to-date SHLAA document which the JPU have had sufficient time to prepare. This should inform the over-arching plan document, specifically help to identify the sites available to meet local housing requirements.

Funding and Delivery

- A respondent considers that there is a lack of discussion within the Pre-Submission JCS regarding the funding and infrastructure constraints that may make the Daventry North East SUE undeliverable in the plan period. Respondent's view is that an increased burden on the road network from the development should be quantified in the JCS to fully show the implications of development, when infrastructure improvements are essential and when contingency measures will need to be triggered if site proves undeliverable.
- A respondent considers the delivery of required Strategic Road Network improvements should be noted as a significant challenge, with no Highways Agency funding envisaged in the plan period. The respondent considers that a high degree of importance should be placed on Paragraph 17.7 in the JCS given the importance of developer contributions or possible local public sector funding sources to deliver essential schemes.

Monitoring the Plan

- A respondent suggests minor changes to include the referencing of the quotations in Paragraph 17.8.
- A respondent considers that there is a lack of clarity on housing delivery due to uncertainty around provision of extensions in Daventry and a lack of

contingencies or certainty about what level of development will be provided through the Strategic Housing Land Availability Assessment (SHLAA). The respondent considers that the full housing trajectory and the Strategic Housing Land Availability Assessment information should be provided within the JCS.

- A respondent raises concerns that the level of development proposed is a fundamental change in approach and departure from present policy from one supporting a growth area to one seeking to ensure only natural change is accommodated.

Housing Trajectory

- A respondent considers that housing trajectories and site delivery schedules for individual districts should be included as part of the JCS to help calculate 5 Year Land Supply position.

Joint Planning Unit Response to Representations

The response to representations follows the headings that have been used in the summary of issues raised by respondents above:

Introduction

The Proposed Changes to the Pre-Submission JCS update the information in relation to known infrastructure requirements and a new Appendix 4 Infrastructure Requirements to the JCS is included. This update provides detailed information in relation to the Key Primary Infrastructure Projects included at Table 7 of the Pre-Submission JCS. Appendix 4 is taken directly from the updated work in relation to the Infrastructure Delivery Plan Update 2012 (IDP). The response to representations under Section 11 of the Pre-Submission JCS contains further details on the JPUs work on this topic, including where Proposed Changes have been made to the plan. However, no changes are proposed to Section 17 in response to these representations.

The Draft Strategic Housing Land Availability Assessment (SHLAA) was published for a 'Call for Further Technical Evidence' consultation in December 2009. The intention of the Joint Planning Unit was always to ensure the Final SHLAA was published in time to support Submission of the Joint Core Strategy. Following an extensive period of work the SHLAA Update (2012) was published in January 2012 in advance of Proposed Changes to the JCS. This represents the Final SHLAA for West Northamptonshire. The documentation is available to review on the JPU website and contains a full update of technical site suitability, availability and achievability constraints whilst also fully reflecting the wider influences currently affecting the house building in West Northamptonshire.

Funding and Delivery

The JPU together with the developer has reassessed the rate of delivery of housing development in relation to Daventry North East SUE and agree that given the economic circumstances currently prevailing and the remaining number of years to implement the plan to 2026 a realistic delivery of housing from the site would be in

the region of 2000 dwellings. However, should economic circumstances alter quicker or more sharply than anticipated then more housing could potentially be delivered. Hence a degree of flexibility is required in the policy wording to account for this. The response to representations under Section 13 (Policy D3) of the Pre-Submission JCS contains further details on the JPUs work on this topic, including where Proposed Changes have been made to the plan. However, no changes are proposed to Section 17 in response to these representations.

The funding of infrastructure will be via a number of funding sources including public sector investment (including central Government funding for major and smaller projects), private sector development (including developer contributions to public sector projects) and the business plans of statutory undertakers. As Government funding is restricted and developer contributions are potentially affected by diminished land value, funding strategic infrastructure will remain challenging in the short term. Nevertheless, evidence shows that Northamptonshire has shown some resilience to the economic downturn and is well placed to thrive as the national economy improves. Recent public funding investment in the proposed new Northampton new bus interchange, Northampton Station and the A45/ A5 Weedon crossroads improvements demonstrate that public funding although hard fought is available for both large and small infrastructure projects. The response to representations under Section 11 (in particular Policy INF1) of the Pre-Submission JCS contains further details on the JPUs work on this topic, including where Proposed Changes have been made to the plan. However, no changes are proposed to Section 17 in response to these representations.

Details of Proposed Changes to the Joint Core Strategy in terms of contingency arrangements are covered in the following sections of this response.

Monitoring the Plan

The quotation requiring a direct reference in Paragraph 17.8 has been removed as part of the Proposed Changes following the revocation of guidance relating to Planning Policy Statement 12: 'Local Spatial Planning'. This Proposed Change addresses representations on this issue.

The Joint Planning Unit has undertaken a comprehensive review of the Monitoring Framework in the Pre-Submission Joint Core Strategy to reflect new guidance in the National Planning Policy Framework in-particular. As a part of this work the Joint Planning Unit agree with the representations seeking greater depth and clarity in terms of monitoring arrangements and contingency measures in the Joint Core Strategy. A series of 'triggers' and 'contingencies' has now been identified in revisions to Appendix 6 ('The Monitoring Framework'). These identify when delivery of JCS policies is not in-line with that required to support the objectives of the Joint Core Strategy and suggest appropriate contingency measures to re-align delivery or instigate the review of policy. This approach is now referenced in this Section as well as in Proposed Changes to Appendix 6 and Section 5 (in particular Policy S6) of the Plan.

The justification for the revised 50,150 housing requirement is fully set out in the Housing technical paper which was published alongside the Pre-submission JCS

and has been updated as part of the Proposed Changes process. The revised target is based on a realistic assessment of what is deliverable having regard to the economic recession and prospects for recovery, together with issues such as infrastructure delivery. It is not accepted that this target is overly pessimistic. Conversely it remains a positive and challenging target that will meet the needs arising from natural change and provide for some additional growth.

Housing Trajectory

It is accepted that the inclusion of individual trajectories for each district and for the NRDA would be helpful within the Joint Core Strategy document. Consequently changes are proposed to Policy S6 and the Housing Trajectory in Appendix 3. Changes are proposed in this section to highlight the role of the housing technical paper in terms of setting out detailed projections of supply on identified sites and the updating of the housing trajectory undertaken through the Joint Authorities' Monitoring Report.

The response to representations under Section 5 (in particular Policy S6) also details Proposed Changes that have been made to the plan to establish projections for housing supply in West Northamptonshire.

Recommended Action

That the Monitoring section be amended in accordance with the following Proposed Changes:

PC001/M to PC027/M inclusive.

18.0 Appendices

100. Appendix 1 – Plans and other Strategies taken into account in the preparation of the Joint Core Strategy

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Appendix 1 – Plans and Other Strategies Taken into Account in the Preparation of the Joint Core Strategy	0	0	0	0	0	0	0	0	0

Summary of issues raised by Respondents

- No representations received.

Joint Planning Unit Response to Representations

No response required.

Recommended Action

None

18.0 Appendices

101. Appendix 2 – Evidence Base for the Joint Core Strategy

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Appendix 2 – Evidence Base for the Joint Core Strategy	5	5	0	2	3	3	0	0	0

Summary of issues raised by Respondents

- One respondent considers that the Sustainability Appraisal provides an inadequate assessment of the potential negative impacts on historic environment; Appraisal tables and Table 7.2 do not identify any of these negative impacts.
- One respondent considers that there are cases where negative impacts on historic environment should have been identified such as Policies C6 and T5, and where it may be difficult to reconcile the amount of new development proposed with areas' designation as a registered park and garden.
- Respondent comments that it is stated that Roade Masterplan have been completed in 2010 but when the JCS consultation opened it had not been finalised or adopted.
- One respondent comments that the evidence base lists the SHLAA which is still work in progress and highly controversial due largely to its emphasis on greenfield sites with no regard for current policies; some sites are in, or immediately adjacent to, conservation areas and special landscape areas.
- One respondent considers that it is unfortunate that the final version of SHLAA is yet to be completed. Respondents would like confirmation that previously made representations to the SHLAA regarding the unsuitability of potential sites around Great Houghton at the draft stage have been properly considered.
- One respondent considers that the following should be added to the evidence base list:
 - Towcester Transport Study;
 - South Northamptonshire Council's Transport Strategy;
 - South Northamptonshire Council's State of the District Economy 2009;
 - South Northamptonshire Council's State of the District Economy 2010; and
 - South Northamptonshire Council's Economic Development Strategy.
- A respondent considers that the 5 Year Land Supply Assessment should be 2010.
- Respondent comments that the Brackley, Roade and Towcester Masterplans completion dates should be 2011.

Joint Planning Unit Response to Representations

The Sustainability Appraisal has assessed the potential impacts of each policy will be on archaeology and the historic environment. The respondent has provided two examples where they feel the Historic Environment has not been adequately analysed, these being Policy C6 (High Speed 2) and T5 (Towcester Racecourse). In regards to Policy C6 and the impact on the historic environment, it is difficult to assess what impact there will be on the historic environment as the final route of High Speed 2 has yet to be determined.

In regards to Policy T5, the respondent has outlined that it may be difficult to reconcile the amount of new development proposed with the area's designation as a registered park and garden. A change is proposed to Policy T5 to address this issue.

In relation to the SHLAA comments, whilst the respondent has listed that the SHLAA in their opinion maybe 'controversial', it is still a piece of evidence that has been taken into consideration during the preparation of the JCS. Furthermore, the SHLAA is not a policy document as indicated under Paragraph 1.2 of the Executive Summary of the SHLAA. The SHLAA does not indicate or determine whether a site could be allocated for development. Instead, it is an evidence source to inform the development plan process as it provides background evidence on the possible availability of land from various sources within West Northamptonshire. It will be used to inform the Joint Core Strategy, which will consider the appropriate policy approach to deliver the housing requirement for Daventry District, Northampton Borough and South Northamptonshire Councils. Therefore it is a requirement to list the SHLAA in Appendix 2.

The final SHLAA has now been completed and all comments were considered during the preparation of the document, including any comments relating to sites around Great Houghton.

South Northamptonshire Transport Strategy, the Towcester Transport Study and South Northamptonshire Economic Development Strategy are included in the Appendix 2 list.

The five year housing land supply assessments are updated annually. A note to this effect will be added to Appendix 2.

It is agreed that the Brackley, Roade and Towcester Masterplans completion dates should be updated accordingly.

Recommended Action

That Appendix 2 is amended as set out in the following Proposed Changes:

PC001/A2 to PC039/A2 inclusive.

18.0 Appendices

102. Appendix 3 – West Northamptonshire Housing Trajectory

Summary of Representations

Policy/ Section	Total No of Reprs	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Appendix 3 – West Northamptonshire Housing Trajectory	0	0	0	0	0	0	0	0	0

Summary of issues raised by Respondents

- No representations received

Joint Planning Unit Response to Representations

No response required.

Recommended Action

None

18.0 Appendices

103. Appendix 4 – West Northamptonshire Infrastructure Schedule

Summary of Representations

Policy/ Section	Total No of Reprs	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Appendix 4 – West Northamptonshire Infrastructure Schedule	25	21	4	4	21	10	6	3	2

Summary of issues raised by Respondents

The following comments have been received in relation to specific elements of the Infrastructure Schedule:

- One respondent considers that adding up the costs for Northampton North leads to the conclusion that developers would pay almost £34,000 per house. No developer could afford such an approach.
- One respondent considers that 40,000 new homes will lead to a bigger shortfall in open space provision when a shortfall already exists. As most green infrastructure proposals are only of tertiary importance and are unlikely to come into existence, we are left with the prospect of more high density housing squeezed onto greenfields.
- One respondent does not consider specified costs and timing of delivery associated with many of the items currently set out in Appendix 4 relating to Daventry North East SUE is sufficiently robust or substantiated.
- Respondents consider that healthcare issues are only resolved at a local level, consisting of health centres and doctor/ dentist surgeries. Provision of new or extended hospital facilities is not covered.
- A respondent considers that in relation to Page 201 of the JCS the infrastructure schedule is incomplete as the source of funding is not secure and lacks the evidence base as to realistic cost. It is linked to specific developments and does not identify the cumulative effective on the infrastructure and the overall cost of that infrastructure, e.g. the North West Bypass.
- A respondent questions that in relation to Item L5 in the West Northamptonshire Infrastructure Schedule whether this a realistic sum of money (£59.63m) to expect developer contributions to fund? Respondents question given that the Infrastructure Delivery Plan was published in February 2011 and the Pre-Submission JCS was approved for publication in January 2011, how was the Infrastructure Delivery Plan (IDP) evidence used to inform the JCS? Respondent questions that Northampton West South SUE section has no contributions for road infrastructure listed - what about road safety improvement to the busy commuter/ "rat runs" north and south of site?
- A respondent considers that Appendix 4 is not deliverable in respect of the requirement for a new primary school to be provided as part of the Northampton South SUE (Item G2 in the West Northamptonshire Infrastructure Schedule).

- One respondent requests clarification in relation to Policy N5 that requires a 'contribution' towards off-site primary school provision, whilst Appendix 4 suggests a school might be provided on-site.
- A respondent considers that clarification is sought as to whether the required infrastructure provision for Northampton South SUE is based on the 1,000 dwellings indicated in Policy N5. The respondent requests clarification because Appendix 4 is stated to be based on the IDP which indicates that Collingtree (assumed to be the same location) has a capacity for 2,200 dwellings. The respondent considers that clearly, a materially larger scheme would have greater implications for physical, social and other infrastructure. The respondent considers that accordingly, the matters identified in Appendix 4 may be incorrect even if Bovis Homes' objection to increase the size of the allocation to accommodate up to 1,400 dwellings is accepted.
- A respondent considers that in relation to Towcester it is noted that:
 - In Policy T4 for example, the bypass is to be funded by the Highways Agency and Northamptonshire County Council whilst all negotiations to-date have consistently placed responsibility for funding in the first instance with developers;
 - Secondly, it has been agreed that the secondary schooling required by development is significantly less than 6 form entry but the County Council wish to have the option to build a 6 form entry, or larger; and
 - Thirdly, whilst noted that the town park has a tertiary status, it is established that this is aspirational and not necessary for the main scheme developer to provide this.
- One respondent considers that the entry in the West Northamptonshire Infrastructure Schedule for the Grosvenor Centre is factually incorrect. The respondent states that whilst the new Bus Interchange is integral to the Grosvenor Centre development, the developer is not responsible for funding or to procure the new bus interchange as it is to be provided and funded by the public sector. It is suggested that the Infrastructure Delivery Plan should be amended as such.
- A respondent considers that in relation to Northampton North SUE Item I2 in the West Northamptonshire Infrastructure Schedule outlines a 2 x 2 form entry primary school as being funded by developers and the County Council. Northampton North in itself would generate the requirement for these two schools and it is understood that the level of growth being planned for would not result in significant increases in children of school age. Respondents are concerned that the costings attributed to some infrastructure items have not been subject to a suitable level of scrutiny and are unsound.
- A respondent considers that in relation to Northampton King's Heath Sustainable Urban Extension Item J1 in the West Northamptonshire Infrastructure Schedule:
 - A new road link from the A428-A5199 is identified within 0-3 years of first dwelling completions; however it cannot be established that any such road must be constructed within the first three years following any completion.
 - Secondly, the respondent considers that the IDP attributes Item J16 (a secondary school) as being funded by developers and the County Council. Respondents consider that it should be clear that Kings Heath, by itself would not require a secondary school. If the school is required to meet needs arising from the development of other sites that this must be made clear.

- Thirdly, the respondent considers that in relation to the timing for Item J14 (Dallington to Kings Heath road improvements under Northampton King's Heath SUE) in the West Northamptonshire Infrastructure Schedule any link between Dallington and Kings Heath at 2015 can only be arbitrary at this stage.
- The respondent considers that Item K4 (Park and Ride Facility under Northampton North of Whitehills SUE) in the Schedule mistakenly states the park and ride facility related to Buckton Fields is to be provided on A508 corridor. In fact the facility is to be provided at the junction between Welford Road (A5199) and Brampton Lane.
- The respondent questions, in relation to Item AE2 (Public Transport under Daventry International Rail Freight Terminal), whether constraints or conditions are being imposed on the businesses taking on Daventry International Rail Freight Terminal units to utilise the Motorways and not the A361, A5, A45 as these roads are not appropriate for increased Heavy Goods Vehicle traffic.
- The following comments have been received in relation to more general aspects of the Infrastructure Schedule:
 - The respondent questions whether the Infrastructure Delivery Plan has been updated to take account the reduction in housing provision now proposed in the JCS.
 - The respondent considers that the IDP should clearly set out a current view of critical infrastructure required to deliver the JCS and suggest it is not currently clear which infrastructure is critical to delivery of the JCS and which is merely desirable.
 - A respondent is concerned that in relation to Secondary School Provision the plan should make adequate provision for secondary schooling as currently the JCS makes provision for only one secondary school at Northampton which appears light relative to level of housing proposed. The respondent requests that this matter be kept under review as the plan develops.

Joint Planning Unit Response to Representations

The Infrastructure Delivery Plan Update 2012 (IDP) provides estimated costs of infrastructure and funding sources. The IDP Update provides refreshed information on cost and timing of infrastructure in close consultation with infrastructure providers. It is a supporting document to the JCS.

Funding for infrastructure will be via various forms of funding both public and private. The West Northamptonshire partners are seeking to introduce the Community Infrastructure Levy (CIL) following the adoption of the JCS. The CIL is a viability tested charge on most forms of new development. Unlike S106 planning obligations CIL monies can be used to help fund a wide range of infrastructure projects including strategic infrastructure not necessarily directly related to the development the CIL monies are accrued from. Section 106 planning obligations will still be relevant to infrastructure provision directly related to mitigating the impact of development but must be in compliance with CIL regulation 122 and paragraph 204 of the National Planning Policy Framework. This is fully explained in the text to the Infrastructure and Delivery section and further clarified by Proposed Changes to the section.

The IDP includes green infrastructure provision which includes open space. Green infrastructure and open space are important elements of infrastructure provision. Sustainable Urban Extension (SUE) policies require green infrastructure provision.

Acute healthcare provision is revenue funded by the Department of Health and delivered by NHS Trusts and the Clinical Commissioning Groups within the County. Providing acute healthcare infrastructure is beyond the control of the Partner Authorities and developers within West Northamptonshire.

A North West Bypass for Northampton will be required within the JCS plan period. The section from the A428 to Grange Farm (North West Bypass, Phase 1) which will be required as part of the Northampton Kings Heath SUE and is likely to be commenced around 2016. Phase 2 of the North West Bypass (between Grange Farm and A5199) will be required to be delivered by 2026 with a possible commencement date at around 2021. The North West Bypass is required to serve the Sustainable Urban Extensions of North of Whitehills, King's Heath and Northampton West. Phase 1 of the North West Bypass will link in to the Sandy Lane Improvement North which runs from the A428 to Roman Road/Berrywood Road and which has already been built. A new section of road to the south of the Sandy Lane Improvement North is known as the Sandy Lane Relief Road (between Roman Road and the A4500). A southern part of this is built and the remaining part will be brought forward by the Norwood Farm Upton Lodge development at around 2016. The Sandy Lane Relief Road and Northampton North West Bypass between them will complete an orbital route around the western side of Northampton, giving access to the A45, A43, M1 and to SUEs to the north-west and west of the town.

The publication of the IDP in February 2011 closely followed approval for publication of the Pre-submission JCS. The IDP was however available during production of the JCS as the document had been drafted and reviewed by infrastructure delivery partners in advance of its publication. The reference to £59.63m in Appendix 4 of the Pre-Submission JCS in relation to water infrastructure was found to be a typographical error.

Northampton West SUE will require highway infrastructure provision as referred to in the SUE policy and IDP 2012 update.

The IDP Update 2012 amends the entry in respect of the new bus interchange for Northampton.

The Towcester Relief Road is to be funded by the developer as infrastructure required to mitigate the impact of the development of the Towcester South SUE.

Any further extension of Daventry International Rail Freight Terminal (DIRFT) will be determined by application to the new Major Planning Infrastructure Unit created within the Planning Inspectorate. The relevant Secretary of State will be the decision maker which may include transport requirements.

The developer of Towcester South SUE will be required to provide green infrastructure to support the development. The proposal for a town park has been put forward by the developer. Potentially there may be other financial contributors.

Northampton South SUE, a development of 1,000 dwellings, will be required to provide a site for a primary school. The developer will contribute proportionally to this infrastructure, consistent with paragraph 204 of the National Planning Policy Framework (NPPF) and regulation 122 of the Community Infrastructure (CIL) Regulations (as amended).

Towcester South SUE, a development of 3,000 dwellings in total, will be required to provide for secondary education to meet the needs of the development. The developer will contribute proportionally to this infrastructure, consistent with paragraph 204 of the National Planning Policy Framework (NPPF) and regulation 122 of the Community Infrastructure (CIL) Regulations (as amended).

Northampton North SUE will be required to provide for primary school education to serve the needs of the development. This may be via single, 3 form entry primary school or by 2, 2 form entry schools. If greater capacity for school places is created than the development requires this will be funded via other means such other developer contributions from developments that may access the new schools. There is presently no capacity within Northampton related primary schools and non-forecast in the identifiable future.

Neither the IDP 2011 nor the IDP Update 2012 implies that the new secondary school to be sited at Northampton Kings Heath SUE is required solely as a result of the development of the Northampton Kings Heath SUE.

Secondary school provision as identified in the IDP has been updated in the 2012 Update in close consultation Northamptonshire Council as education infrastructure provider.

As regards Park and Ride sites these are proposed to be deleted from the JCS. Northamptonshire County Council considers that the challenge of delivering Park and Ride for Northampton, even on the busiest corridors, by 2026 is sufficient to make most of the allocated Park and Ride sites unlikely to be brought forward within the plan period.

Both the IDP 2011 and the IDP Update 2012 are based on the reduction in housing provision provided by the Pre-Submission JCS.

The IDP identifies Key Primary Infrastructure which is then identified at Table 7 of the JCS. Infrastructure priorities are likely to change over time as items of infrastructure are delivered.

Recommended Action

That Appendix 4 is amended as set out in the following Proposed Changes:

PC001/A4

PC002/A4

18.0 Appendices

104. Appendix 5 – Saved Local Plan Policies to be replaced by Joint Core Strategy Policies

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Appendix 5 – Saved Local Plan Policies to be Replaced by Joint Core Strategy Policies	3	3	0	1	2	1	1	0	0

Summary of issues raised by Respondents

- The respondent does not believe that Saved Northampton Local Plan policies E1, E7, E9 and E39 have been adequately addressed by the Joint Core Strategy policies which are supposed to replace them (i.e. Policies BN2, BN5, S10 and S11).
- The respondent considers that the remaining Northamptonshire County Structure Plan Policy SDA 1 (Strategic Development Area Proposals) which includes development at Towcester should be on the list of policies to be replaced by the Joint Core Strategy.
- The respondent considers that in regard to large scale development at Dallington Heath and North of Whitehills the JCS appears merely to have accepted them as commitments derived from old style development plans. The respondents consider that saved development policies in old style development plans should be subjected to utmost critical scrutiny as to the current circumstances rather than merely be treated as commitments because of their presence in the old style development plans.

Joint Planning Unit Response to Representations

In regards to the Northampton Local Plan policies, Policies E7 and E9 have not been included in the replacement policies list in Appendix 5, therefore these policies will be saved until such time when they are replaced by the Northampton Related Development Area Local Plan. In relation to Policies E1 and E39, it is considered that Policies BN2 (Biodiversity) and BN5 (The Historic Environment) of the Joint Core Strategy are an adequate replacement to Policy E1 of the NBC Local Plan. Policies S10 (Sustainable Development Principles) and S11 (Renewable Energy) of the Joint Core Strategy are an adequate replacement to Policy E39 of the NBC Local Plan. It is considered that the Joint Core Strategy policies are more positively prepared and are more consistent with national policy than the Local Plan policies.

In regards to Policy SDA1 of the Northamptonshire County Structure Plan, this has now been added to the Appendix 5 list as a policy that is replaced by Joint Core Strategy Policy S1 (The Distribution of Development) and Policy S5 (Sustainable Urban Extensions).

Dallington Heath and North of Whitehills SUE allocations have been subject to the 'upmost scrutiny' through the JCS process and have been subject to analysis through the Sustainability Appraisal process that runs alongside the development of JCS. The development of these SUE options have been scrutinised and assessed through the progression of the Joint Core Strategy from the initial Issues and Options stage through the Emergent Joint Core Strategy stage and assessed at Pre-Submission. They have been found to be sustainable development options along with other SUE allocations.

Recommended Action

That Appendix 5 is amended as set out in the following Proposed Changes:

PC001/A5
PC002/A5
PC003/A5
PC004/A5
PC005/A5
PC006/A5
PC007/A5
PC008/A5
PC009/A5
PC010/A5
PC011/A5
PC012/A5.

18.0 Appendices

105. Appendix 6 – West Northamptonshire Monitoring Framework

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Appendix 6 – West Northamptonshire Monitoring Framework	1	1	0	1	0	0	0	0	0

Summary of issues raised by Respondents

- The respondent considers that changes should be made to the indicators on the National "Heritage At Risk Register" so that all designated heritage assets are included rather than Grade I / II* only. The respondent considers that the indicator should also recognise that not all heritage assets were assessed in 2006, so the target should be revised to achieve a decline in assets at risk since assessment began.

Joint Planning Unit Response to Representations

The Joint Planning Unit accepts the concerns of the respondent and has included revisions to the monitoring of heritage assets as part of the Proposed Changes to the Joint Core Strategy. Revisions to Appendix 6 ('The Monitoring Framework') now allow the identification of all heritage assets at risk so full use can be made of the English Heritage "At Risk" Register. This Register has been updated substantially since publication of the Pre-Submission Joint Core Strategy. Provisions now made under the Trigger and Contingencies section of the Monitoring Framework establish the 2011 base date of the Joint Core Strategy for reporting the condition of heritage assets. They also set out that reporting will commence for new assets as soon as data becomes available.

Recommended Action

That the supporting text and policy be amended as set out in the following Proposed Changes:

PC178/A6
PC180/A6
PC181/A6

19.0 Glossary of Terms and Abbreviations

106. Glossary of Terms and Abbreviations

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
19.0 Glossary of Terms and Abbreviations	0	0	0	0	0	0	0	0	0

Summary of issues raised by Respondents

- No representations received

Joint Planning Unit Response to Representations

No response required.

Recommended Action

None

20.0 Maps and Key Diagram Index

107. Figure 1 – West Northamptonshire Context Map

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Figure 1 – West Northamptonshire Context Map	0	0	0	0	0	0	0	0	0

Summary of issues raised by Respondents

- No representations received

Joint Planning Unit Response to Representations

No response required.

Recommended Action

None.

20.0 Maps and Key Diagram Index

108. Figure 2 – West Northamptonshire Key Diagram

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Figure 2 – West Northamptonshire Key Diagram & Legend	4	4	0	1	3	1	1	1	0

Summary of issues raised by Respondents

- Respondents recommended that additional information be depicted in Figure 2, including:
 - A Strategic Employment Site allocation should be denoted at Houghton Gate;
 - The symbol for DIRFT Policy E4 on the Key Diagram should be relocated to reflect the correct location of DIRFT III (west of the Motorway and north of Junction 18); and
 - A plan should be included within the JCS showing the location and extent of the DIRFT III strategic development opportunity site. It was also a resolution of the West Northamptonshire Joint Strategic Planning Committee held on the 31/1/11 that a map of DIRFT was provided to accompany the Submission JCS.

Joint Planning Unit Response to Representations

The Houghton Gate Strategic Employment site allocation is a site specific issue which will be shown on the Northampton Related Development Area Local Plan. It is too site specific to deal with at a strategic level. No reference is made to Houghton Gate in the JCS, therefore showing an allocation on this Figure would lead to confusion.

It is recognised that although the DIRFT allocation on the Pre-Submission was drawn in the correct location, the label for this allocation was placed on the wrong side of the motorway which gave the appearance of the DIRFT site appearing on the wrong side of the carriageway. This has now been rectified by moving the label to the correct side of the motorway above the proposed allocation.

At the Joint Strategic Planning Committee on the 31st January 2011, it was agreed that 'a map of DIRFT be produced to accompany the 'Submission' Joint Core Strategy. The DIRFT site will be shown in detail on the Proposals Map which will accompany the Submission Core Strategy.

Recommended Action

Amend Figure 2 and insert a new Figure 3.1 as set out in the following Proposed Changes:

PC001/MK
PC002/MK

20.0 Maps and Key Diagram Index

109. Figure 3 – West Northamptonshire Key Enlargement

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Figure 3 – West Northamptonshire Key Diagram Enlargement	1	1	0	1	0	0	0	0	0

Summary of issues raised by Respondents

- The respondent recommends that the A428 be shown north of Northampton.

Joint Planning Unit Response to Representations

It is proposed to add the A428 north of Northampton.

Recommended Action

That Figure 3 is amended as set out in the following Proposed Changes:

PC001/MK

20.0 Maps and Key Diagram Index

110. Figure 4 – Northampton Related Development Area Map

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Figure 4 – Northampton Related Development Area Map	3	2	1	1	2	1	0	1	0

Summary of issues raised by Respondents

- Respondents seek clarification of the term: 'Greenspace associated with the SUE' and recommend this be amended to 'as part of the SUE'.
- The respondent seeks clarification regarding the legend and that it should make it clear that the road line for the North West Bypass is indicative.
- Respondent considers that a Strategic Employment Site allocation should be denoted at Houghton Gate.

Joint Planning Unit Response to Representations

The 'Greenspace associated with the SUE' has subsequently been re-worded to state 'Indicative Structural Green Space associated with SUE'. It is felt that it is not appropriate to add 'as part of the SUE' as some of the Green space allocations may be delivered independently from the SUE proposal, e.g. Upton Park.

The legend for the North West Bypass has now been re-phrased to read 'Indicative alignment for improvements to Transport Infrastructure (Road)'. This clarifies that the route shown on Figure 4 is indicative.

Finally the Houghton Gate Strategic Employment Site has not been allocated in the JCS and is not therefore shown on the Proposals Map.

Recommended Action

That Figure 4 is amended as set out in the following Proposed Changes:

PC003/MK

20.0 Maps and Key Diagram Index

111. Figure 5 – West Northamptonshire Proposal Map

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Figure 5 – West Northamptonshire Proposals Map & Insets	20	20	0	4	16	6	7	2	1

Summary of issues raised by Respondents

- Respondents consider that the maps do not deal with green infrastructure in West Northamptonshire. It is felt that such a map would aid an overview of where wind farms might best be sited.
- Respondent considers that the maps are dominated by constraints i.e. flood zones, minerals safeguarding areas, nature conservation areas, etc. In addition, Figure 5 only shows locations of inset maps rather than any actual development or other proposals.
- Respondent considers that most Inset maps show Mineral Safeguarding Areas from the adopted Minerals and Waste Development Framework Core Strategy and refer to them in the legend accordingly. The JCS however does not explain what the Mineral Safeguarding Areas are and the role they perform.
- Respondent considers that a Strategic Employment Site allocation should be denoted at Houghton Gate.
- Respondents disagree with part of Towcester South SUE being identified as Strategic Green Space on the grounds that no robust evidence exists to justify this position. Respondent supports the development of housing and connections on the site but consider that the designation of part of the land as Strategic Green Space designation would be inconsistent with residential development.

Inset 1: Brackley North SUE and Inset 2: Brackley East SUE

- Respondent considers that the standard legend on all the inset maps could cause confusion if none of the elements are depicted on the maps.
- Respondent considers colour tone of the mineral safeguarding area is the same colour tone as all the SUEs on Figure 4, whereas the SUEs on the inset maps are left without a colour tone. They feel that this is confusing and the notations ought to be consistent.
- Respondent considers that unless there is a proposal to extract any mineral reserves within a SUE prior to any development proceeding, it is unnecessary to show the designation within the SUE boundary.

Inset 3: Towcester South SUE

- Respondent disagrees with part of Towcester South SUE being identified as Strategic Green Space on the grounds that no robust evidence exists to justify this position. The respondent supports the development of housing and connections on the site but consider that the designation of part of the land as Strategic Green Space designation would be inconsistent with residential development.

Inset 4: Towcester Racecourse

No Representations Received

Inset 5: Towcester Centre & Moat Lane Regeneration Area

No Representations Received

Inset 6: Daventry North SUE

- Respondents recommend that the Inset Map 6 under Figure 5 be amended to include another red line which depicts the Monksmoor Farm site.
- Respondent seeks clarity regarding the approach to be taken to addressing the Minerals Safeguarding designation on part of the SUE site in the planning application process.
- Respondent express concern that the Local Nature Reserve is not depicted on the map despite being shown on the legend.

Insets 7 - 13: Northampton Inset Maps showing SUE locations

- Respondent seeks clarification regarding the allocation of 'approved in principle' in respect of Upton Lodge and Norwood Farm should not show development west of the new Link Road – this is unsound. There is opposition to residential development in the area of Upton Lodge/ Norwood Farm to the west of the new link road. It is thought that it is a clear intention to reserve this land as an extension to the country park therefore this area should be shown as green on the diagram to avoid doubt and or change of planning policy within the plan period.

Inset 8: Northampton Kings Heath SUE

- Respondent considers that the line of the Northampton Related Development Area disappears. They feel that the map needs to be improved in cases where lines run together in order that they can still be seen.

Inset 10: Northampton North SUE

- Respondent draws attention to the point that Crowfields Common Local Nature Reserve is not notated on the plan. They feel that the line of the Northampton Related Development Area disappears.

Inset 12: Northampton South SUE

- Respondent considers the allocated site includes a large area of land which is existing public open space and is shown on the attached plan (green area). This was provided to meet the needs arising from the existing development at East Hunsbury and in particular that area to the south of Rowtree Road and east of the railway line. They therefore feel that it would be totally inappropriate for this public open space to be counted as part of the structural greenspace to be provided as part of the Northampton South SUE. The existing public open space should be deleted from the allocated area as edged red.

Insets 14 – 15: Brackley Business District

No Representations Received

Joint Planning Unit Response to Representations

Figure 6 shows the Green Infrastructure network in West Northamptonshire in regards to sub-regional and local corridors. Any site specific Green Infrastructure asset would be dealt with at a site specific level.

Figure 5 is intended to show the constraints within the West Northamptonshire area. This was in line with the guidance contained within PPS 12 on what was required to be shown on a proposals map. Paragraph 8.1 of PPS12 lists all of the requirements for the Proposals Map which are shown on Figure 5. Figure 5 also shows the outline of the Sustainable Urban Extensions within West Northamptonshire within the Inset plans. Further details of the Sustainable Urban Extensions can be found within the relevant inset plans.

It has been recognised on the Pre-Submission version of Figure 5 that no explanation was given for the term 'Mineral Safeguarding Area' A note will be added to Figure 5 and all the Inset Maps stating: 'For further details about the Minerals Safeguarding Area see the Northamptonshire MWDF Core Strategy DPD (Adopted May 2010)'.

The Houghton Gate Strategic Employment Site not been allocated in the JCS and as such it is not shown on the Proposals Map.

The area identified as the Strategic Greenspace within the Towcester South SUE is of high environment quality and presents the opportunity to provide a new town park which will link the existing urban area with the SUE at Towcester South. It will also help to sustain and enhance the green infrastructure networks in this area.

Inset 1: Brackley North SUE and Inset 2: Brackley East SUE

The legend for each SUE plan will be amended to only show those constraints which particularly affect that SUE. For example, the Brackley East SUE (Inset 2) is affected by flood risk areas, therefore these are shown on the legend. However, the Brackley North SUE (Inset 1) does not include any flood risk areas and these will be deleted from the legend.

The colour tone on Figure 4 will be adjusted to ensure that there is no confusion with the SUE shading and Mineral Safeguarding areas. It is appropriate to show any mineral safeguarding area on the Proposals Map as a statement of fact, regardless of whether or not a scheme is in place to extract any mineral reserves in an SUE prior to any development commencing.

Inset 3: Towcester South SUE

As discussed under the general comments section, the area identified as the Strategic Greenspace is of high environment quality and presents the opportunity to provide a new town park which will link the existing urban area with the SUE at Towcester South. It will also help to sustain and enhance the green infrastructure networks in this area.

Inset 6: Daventry North SUE

As Monksmoor Farm is not a Sustainable Urban Extension allocated in the JCS the site is not shown on the Inset Map.

A note will be included on all the Inset Maps referring to the Northamptonshire MWDF Core Strategy (2010) which provides guidance on minerals safeguarding and extraction in relation to development sites.

It has been recognised that the Daventry Reservoir Local Nature Reserve was not shown on the Inset Plan. This Nature Reserve has now been added to the Inset Plan.

Insets 7 - 13: Northampton Inset Maps showing SUE locations

Figure 4 is an illustrative guide to the development that has been approved in the area. The 'development' in the Upton Lodge and Norwood Farm area includes the proposed extension to the country park. Figure 4 therefore shows the full extent of the development including the country park which extends beyond the relief road.

The line of the Sandy Lane Improvement North will be shown on the Inset Map for clarity.

Inset 8: Northampton Kings Heath SUE

It has been recognised that in the original Pre-Submission Inset plan that the NRDA line was hidden by the SUE boundary. The Inset Map will be amended to rectify this.

Inset 10: Northampton North SUE

It has been recognised that the Crowfields Common Local Nature Reserve was not shown on the Inset Plan. This Nature Reserve will be added to the Inset Plan.

Inset 12: Northampton South SUE

Whilst it is recognised that the area highlighted in the consultation response forms an area of existing public open space, allocating this area as 'Indicative greenspace associated with the SUE' does not change this designation of existing open space. The area will continue to be protected as public open space.

Recommended Action

That Figure 5 and Inset Maps be amended as set out in the following Proposed Changes:

PC004/MK
PC005/MK
PC006/MK
PC007/MK
PC008/MK
PC009/MK
PC010/MK
PC011/MK
PC012/MK
PC013/MK
PC014/MK
PC015/MK
PC016/MK
PC017/MK
PC018/MK
PC019/MK

20.0 Maps and Key Diagram Index

112. Figure 6 – West Northamptonshire Green Infrastructure Networks

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Figure 6 – West Northamptonshire Green Infrastructure Networks Map	1	1	0	1	0	0	0	0	0

Summary of issues raised by Respondents

- Respondent considers that the title refers to 'Networks' whereas the legend refers to 'Corridors'. The respondent feels that this needs to be clarified.

Joint Planning Unit Response to Representations

The title of Figure 6 has been amended to read 'network' instead of 'networks' in order to clarify that the green infrastructure 'corridors' form the green infrastructure network.

Recommended Action

That Figure 4 is amended as set out in the following Proposed Changes:

PC020/MK