



The Planning  
Inspectorate

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# **Report to Daventry District, Northampton Borough and South Northamptonshire Councils**

**by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCMI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date: 2<sup>nd</sup> October 2014**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

## **REPORT ON THE EXAMINATION INTO THE WEST NORTHAMPTONSHIRE JOINT CORE STRATEGY LOCAL PLAN**

Document submitted for examination on 31 December 2012

Examination hearings held between 16 April 2013 and 21 March 2014

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## Abbreviations Used in this Report

AA	Appropriate Assessment
AHVA	Affordable Housing Viability Assessment
CWS	County Wildlife Site
DIRFT	Daventry International Rail Freight Terminal
EA	Environment Agency
EH	English Heritage
HA	Highways Agency
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
JCS	Joint Core Strategy
LDS	Local Development Scheme
LNR	Local Nature Reserve
LP	Local Plan
MM	Main Modification
NCC	Northamptonshire County Council
NE	Natural England
NGMS	Northampton Growth Management Study
NNW	Northampton North West Bypass
NPPF	National Planning Policy Framework
NRDA	Northampton Related Development Area
NWEZ	Northampton Waterside Enterprise Zone
RS	Regional Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SLRR	Sandy Lane Relief Road
SUE	Sustainable Urban Extension

## **Non-Technical Summary**

This report concludes that the West Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS) provides an appropriate basis for the planning of the area up to 2029, providing a number of main modifications are made. The Councils have specifically requested that I recommend any main modifications necessary to enable them to adopt the plan. All of the main modifications were proposed by the Joint Planning Unit (JPU) on behalf of the Councils and have been the subject of public consultation and SA/SEA. With one exception that is not fully justified or entirely necessary, I have recommended their inclusion after full consideration of the representations from all other parties on these issues.

The main modifications can be summarised as follows:

- Extend the end of plan period from 2026 to 2029 and increase the total number of new houses to 42,620, 2011 – 2029, (2,367 per year) from about 50,150, 2001 – 2026 (about 2,000 per year) in the submitted plan;
- Allocate an additional sustainable urban extension (SUE) (policy N9A) at Northampton to reflect the above and that the site is already largely committed for new housing and related development over the plan period;
- Extend the sites of, and increase the expected totals of new homes from, three of the SUEs to help meet the revised housing needs and utilise the opportunities available to improve delivery in accord with an amended new housing trajectory, notably at Northampton, and
- Allocate land at J16 M1 for new employment development (policy E8), but on a smaller scale than proposed by the JPU for the Councils and without an identified additional reserve site that is not fully justified or necessary in the plan period.

## Introduction

1. This report contains my assessment of the West Northamptonshire Joint Core Strategy (JCS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) (para 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authorities have submitted what they consider to be a sound plan. The basis for my examination is the submitted plan of 31 December 2012, including the list of Proposed Changes (SUB 04).
3. My report deals with the main modifications that are needed to make the plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Joint Planning Unit (JPU) on behalf of the Councils requested that I should make any main modifications needed to rectify matters that make the plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix. They have all been subject to public consultation and, where necessary, Sustainability Appraisal (SA) and I have taken all the consultation responses into account in writing this report.

## Assessment of Duty to Co-operate

4. Section 20(5)(c) of the 2004 Act requires that I consider whether the Councils have complied with any duty imposed on them by section 33A of the 2004 Act in relation to the plan's preparation. It is a requirement that the Councils engage constructively, actively and on an on-going basis with the County Council, neighbouring local authorities and a range of other organisations, including the Highways Agency (HA), the Environment Agency (EA) and Natural England (NE). All relevant bodies listed in Regulation 4 have been engaged, albeit some more than others depending on the extent of their involvement in the plan's particular policies and proposals.
5. In the Duty to Co-Operate Compliance Statement (December 2012) (SUB 31) and elsewhere, the JPU on behalf of the Councils has satisfactorily documented where and when co-operation has taken place, with whom and on what basis, as well as confirming that such positive engagement has and will continue. This includes previous co-operation on a wider regional and sub-regional basis in relation to the former East Midlands Regional Strategy (RS) and the direct involvement of Northamptonshire County Council (NCC), who are part of the Joint Strategic Planning Committee (JSPC) that prepared the plan, in accord with the Joint Committee Order (SI 2008 No. 1572) under which it operates.
6. There is also clear evidence of continuous co-operation with the equivalent JPU for the rest of the county (North Northamptonshire), amongst others; the outcomes of which demonstrate constructive engagement by the JPU/Councils

on an on-going basis, including in relation to the proposed main modifications. In addition, the plan is consistent with the relevant Corporate Plans of all four Councils, including the County Council.

7. For the time being at least, none of the area's neighbouring Councils has specifically sought help in meeting their local housing or other needs and the JPU has not asked any other authority to help them; nor does it intend to. Furthermore, no significant cross boundary strategic issues relating to co-operation with neighbouring Councils or Reg. 4 bodies remain unresolved. Any future requests that may come from neighbours for help in regard to their objectively assessed needs would be a matter for a plan review to consider at the appropriate stage(s). Therefore, given the absence of any clear evidence to the contrary, I am satisfied that the duty to co-operate has been met.

## Assessment of Soundness

### Preamble

8. The main areas of debate surrounding this plan relate to the provision of new housing and employment. Clearly, the plan is expected to comply with the National Planning Policy Framework (NPPF) (March 2012), including by defining the full, objectively assessed, needs for both market and affordable new housing at the outset (para 47 NPPF), before deciding whether or not it can be delivered in practice, taking into account relevant national and important local constraints, such as flood risk.
9. Many respondents expressed doubts about the JPU's approach to new housing provision in the submitted plan, not least regarding the initial assessment of need, including in relation to the former East Midlands Regional Strategy (RS). I have shared some of those concerns during the examination process, as reflected in my preliminary findings following the hearings in April 2013. For the Councils, the JPU has responded positively by commissioning new and independent assessments of the full, objectively assessed, needs for new housing in the area. This has resulted in revised figures, particularly in respect of housing, that have been included in the proposed main modifications of December 2013.
10. These include a material increase in the level of new housing provision from 50,150 from 2001 to 2026 to 42,620 homes from 2011 to 2029, and the allocation of an additional, strategic level, site at Northampton Norwood Farm/Upton Lodge (policy N9A). This should help meet shorter term needs in Northampton in particular, partly in the light of delays in the delivery of some of the other strategic sites allocated in the plan, mainly as a result of the recent recession in the national and local economy affecting viability.
11. However, given the potential alternative sites available nearby, including the recent approval of a major extension of 345 ha to DIRFT near Daventry for rail linked freight, there is no overriding local need for a major new strategic employment allocation on a greenfield site in the open countryside at J16 of the M1 in full, or to include an extensive reserve site in addition. Accordingly, this modification proposed by the JPU is not endorsed and it should only be included in the adopted plan at a reduced scale (policy E8).

12. The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process for a qualifying plan or project requires, amongst other things, an assessment of reasonable alternatives on a comparative basis to the preferred option(s) and the provision of at least summary reasons why the preferred option was chosen. There was an initial defect in the process in this instance as the SA Report did not set out why, at settlement level in the four main towns, some development options were rejected as not reasonable and why all those options that were judged as reasonable were not considered on a comparative basis to the preferred option(s).
13. Recent case law (e.g. Cogent Land v Rochford D.C.) confirms that, in such circumstances, remedial action prior to adoption of the plan is normally permissible. Thus, the earlier omission of this work from the SA/SEA process in this case has since been rectified by the preparation of an Addendum to the SA/SEA Report by consultants for the JPU. Taking into account all the responses to the public consultation on the Addendum, I am satisfied that it is suitable and appropriate, in principle, in its coverage and conclusions. Overall, therefore, the SA/SEA process for this plan has been satisfactory.

### **Main Issues**

14. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified twenty one main issues upon which the soundness of the plan depends.

### **Issue 1 – Strategy, Vision, Objectives (policies S1, S10/11, RC1/2, N1/11)**

15. The plan sustainably focusses new development on a series of large planned expansions of the existing urban areas of the four main towns; Brackley, Daventry, Northampton and Towcester. By far the most growth is logically concentrated on Northampton, the area's main economic, retail and cultural centre, as well as the county town and much the largest settlement. Also, transport connections there by rail, including to London and Birmingham, and by road, such as on the M1 motorway, are generally good. The majority of local employment opportunities, including in the town/local centres, together with most major services and facilities, are also in the towns, with Northampton having the largest share (around 70%) by a wide margin.
16. To a degree, the present pattern of development reflects the traditional industries of the area, such as boot and shoe making in Northampton, but many are now closing, moving away and/or contracting, with some being replaced by more modern, higher tech, manufacturing and logistics operations, attracted by the central location and good transport links amongst other things. In addition, the plan's strategy envisages some limited and complementary growth in the smaller settlements to help meet local needs, but on a much smaller scale than for the main towns.
17. As submitted, the strategy is based on 15 logical spatial objectives, all of which have a part to play in delivering the plan's vision to 2029, with specific targets set for each in relation to monitoring and implementation. However, as the JPU now proposes, a further one is necessary relating to heritage to ensure the conservation and, where possible, enhancement of the area's many important heritage assets (**MM 3**).

18. In the local context, the spatial vision and the strategic focus on a series of large Sustainable Urban Extensions (SUEs), mainly around Northampton but also at the other main towns, is sound and sensible, in principle, as well as consistent with the national guidance in the NPPF. Taking into account the geographical spread of the SUEs and the clear evidence of cross border co-operation between Councils in regard to the Northampton Related Development Area (NRDA), where the majority of growth is planned to meet local needs, there are reasonably good prospects of achieving the levels of growth sought. It is also relevant that the strategic vision is intended to apply beyond the end of the plan period, notably in relation to the longer term growth potential of Daventry and Towcester, for example.
19. However, the delivery of the new housing required is likely to prove challenging for all concerned when compared to past/recent rates of local achievement overall. It relies on the timely delivery of the necessary infrastructure to support it and accordingly progress must be closely monitored. The strategy does not rely on new development in neighbouring areas and there is no clear evidence that any of the strategic alternatives put forward by representors would be more likely to succeed over the plan period.
20. In total, the JPU's evidence base relating to the strategy, vision and objectives of the plan is clear and robust. It is also comprehensive and sufficiently detailed, including through demonstrating, albeit belatedly, that reasonable alternatives to the proposed strategy were assessed in respect of the SA/SEA process. Importantly, this includes in respect of the proposed main modifications, as part of this work was undertaken to rectify some earlier omissions regarding the detailed consideration of alternative locations and boundaries for some of the SUEs, as referred to in the Preamble.
21. This work has been undertaken thoroughly and on an objective basis, with suitable inputs to the various versions of the plan as it has emerged. These have reasonably and realistically reflected the outcomes and taken together help to show how and why the preferred strategy was selected. Alternative scenarios relying on a more dispersed pattern of major developments on the edges of all the larger settlements and/or a new town/villages in specific locations would not have been realistic or more sustainable in this area at any stage of the plan process, having regard to national policies in the NPPF.
22. Moreover, all the work carried out at various stages on the Habitats Regulations Assessment/Appropriate Assessment (HRA/AA) and Addendums is also satisfactory, particularly given that necessary amendments were made to subsequent draft versions of the plan. Accordingly, taking into account the advice from relevant consultees, notably Natural England (NE), the plan is sound in these respects. In particular, policy S1 is sound, including in respect of the priority to be given to making the best use of previously developed land and vacant/under used buildings in urban areas.
23. As modified, policies S10 and S11, setting out the plan's sustainable development principles and low carbon/renewable energy expectations include an appropriate caveat in respect of viability. They would be consistent with the NPPF, albeit some of the details may well no longer be necessary once the national review of the building regulations is complete, as it seems likely to effectively supersede the Code for Sustainable Homes. Policies RC1 and RC2

seek to deliver the regeneration aspirations of the plan's strategy and the social and community infrastructure needs of the local population, including in respect of new developments. Based on the evidence of the current position in the area, both are reasonable and realistic in the local context.

24. Similar conclusions apply in respect of the Northampton central area and the other regeneration areas in the town, as set out in policies N1 and N11, particularly in the light of the adopted Northampton Central Area Action Plan (NCAAP) (January 2013) and the designated Enterprise Zone at Northampton Waterside (NWEZ). Both are already acting as catalysts to bring forward growth and regeneration investment locally in respect of employment, retail, leisure and, not least, education opportunities.
25. All the available evidence, and particularly the Reg. 22(1) Statement of Community Engagement and Consultation (SUB30), confirms that the JPU and its constituent Councils have carried out extensive and appropriate public consultation at each relevant stage of the plan process. This includes in respect of the proposed main modifications, and in accordance with the 2006 Statements of Community Involvement for Daventry, Northampton and South Northamptonshire (SUB 20, SUB 21 and SUB 22).
26. All in all, the plan provides a suitable strategic framework for the area, within which the constituent Councils can readily complete their respective Part 2 Local Plans to make further non-strategic land allocations and more detailed policies for implementation and development management, where necessary. Nonetheless, the JPU proposes that a new policy (SA) should be added to emphasise the presumption in favour of sustainable development required by the NPPF (**MM 1**) and that a new para (3.18) should also confirm their commitment to a review of the plan, to be adopted by no later than 2020, taking it forward to at least 2036 (**MM 2**). Both are necessary for soundness and for clarity as to the future intentions of the Councils.

## **Issue 2 – Retail Scale and Distribution (policies S2, S9, N2 and N10)**

27. In accord with the NPPF, policy S2 properly defines a network and hierarchy of centres across the area, with Northampton as the regional centre clearly at the top and Daventry next as a sub-regional centre. As recognised in the NCAAP, it is essential that new retail development is focussed on the largest town centre, in order to help redress the decentralisation of shopping, leisure and employment uses that has occurred locally over recent years. This is also acknowledged in policy S9 and Table 2 in respect of the expected scale and distribution of new floorspace. New projects and investment in the town centre of Northampton are already underway, including site preparation for the key Grosvenor centre re-development scheme, implementing the specific proposals set out in policy N2.
28. In Daventry, where there has been a leakage of retail expenditure to other locations recently, proposals for the regeneration of the town centre, including new shops, food uses, cinema, library and university technical college, are in progress. These schemes should support and help implement the plan's objectives to reclaim the town's market share and provide new retail floorspace to complement the expected growth in population and help create a more sustainable settlement.

29. At the next level in the retail hierarchy, Brackley and Towcester are termed as Rural Service Town Centres, with the name accurately defining their function. They have only limited scope for new retail floorspace, both convenience and comparison, in each centre, at present, albeit some small scale provision will be necessary to meet local needs arising from their respective SUEs. Below that, Kingsthorpe and Weston Favell are properly deemed to be District Centres within Northampton, reflecting their current levels of usage, services, facilities and range of retail units, as well as their relationships to the town centre and surrounding areas.
30. The plan's retail evidence base, largely comprising the February 2011 Retail Study (GLD73) and July 2012 Retail Capacity Study (GLD74), is robust and up to date. It confirms that Northampton, and to a lesser extent Daventry, should be the strategic priority for new comparison retail floorspace. It also found no evidence of clear gaps in comparison retail provision outside Northampton town centre. Similarly, for convenience retail, with gaps in provision only evident at Northampton and Daventry town centres, it would be sustainable and realistic to seek new provision elsewhere only at the SUEs, in connection with new housing growth, and at a scale that is linked directly to their size and local needs only.
31. Whilst the detail of such provision does not need to be resolved in this strategic plan, it is nevertheless appropriate and consistent with the NPPF (notably para 156) for its retail policies to set out such overall priorities. Accordingly, retail policies S2, S9, N2 and N10 are essentially sound, albeit some modifications are necessary for clarity and to assist implementation. This includes in terms of confirming that proposals for new convenience floorspace in the SUEs should have regard to the existing retail network in the locality and the impact on other centres in the hierarchy (**MM 18**).

### **Issue 3 – Housing Scale and Distribution (policies S3, S4 and S5)**

32. The submitted plan included provision for about 50,150 new homes (2,000 per year) in the area from 2001 to 2026, with around 20,000 remaining to be allocated for the period 2011 to 2026. This was in contrast to the former East Midlands Regional Spatial Strategy (RS) that had a new housing total of 62,125 dwellings for the same timespan (2,485 per year). However, even before the recent recession that annualised target was proving difficult to achieve in practice. As a result, the JPU's figure in the submitted plan was largely based on a revised assessment of need in the Housing Technical Paper Update (July 2013) (GLD 38) that was considered to be more realistic in terms of delivery over the plan period, taking into account relevant constraints and market conditions.
33. However, following the hearings in April 2013, my preliminary findings were that this figure did not represent the full, objectively assessed, local needs for new housing, as required by the NPPF. This was largely because it essentially related to an out of date evidence base that had not been properly reconsidered in the light of current needs and circumstances. Nor did it represent an unconstrained initial assessment of needs, including for affordable housing, to which constraints and market factors could later be applied. Accordingly, the JPU commissioned new assessments that took into account not only the guidance in the NPPF, but also the latest advice in the

"How Many Homes/What Homes Where" toolkit and the early 2011 Census results, amongst other things, such as more recent DCLG/ONS population and household projections providing the necessary inputs on migration and demographic change.

34. The revised assessment by the Cambridge Centre for Housing and Planning Research (June 2013) (J48) was considered the most representative of local housing needs, being realistic and reasonable in the relevant circumstances, as well as up to date and consistent with the requirements of the NPPF. In particular, it took into account a "tracking scenario" regarding likely household formation rates that is sensibly based on only a gradual, rather than an immediate, return to those prevalent before the recent recession recognising that the national and local economy will take time to recover or alternatively the continuation of the lower rates observed in the 2011 Census.
35. None of the alternatives, including those produced by the JPU's other consultants, would seem likely to produce a more accurate or reliable basis for new housing provision, taking into account all the evidence submitted with the proposed main modifications and the comments thereon. Importantly, as a starting point, the Cambridge figures are not affected by considerations of possible constraints to capacity or to delivery, in either policy or practical terms, in accord with the NPPF's requirements in this regard.
36. This assessment leads to a net new housing requirement of 41,760 new homes that also takes into account the extended plan period to 2029 to ensure that it has a minimum lifespan of about 15 years. For comparison purposes only with the RS, this is equivalent to 58,130 units in the period 2001 – 2029. It is also equivalent to 2,320 per year, whereas the submitted plan included 2,252 per year (2011 – 2026). In accord with the NPPF's guidance to also take into account current market conditions, the JPU also judged it necessary to add a further 900 dwellings to the overall total. This is to make allowance for the level of existing commitments, higher housing demand and market prices, as well as the need to allow some further growth in villages and to help redress the historically lower proportions of social rented units, in South Northamptonshire district. Therefore, the overall total, as modified, of 42,620 net new dwellings is equivalent to an average of 2,367 homes per year, 2011 to 2029.
37. Other alternative figures derived from national DCLG/ONS projections indicate that a higher annual rate of new housing delivery might better meet local needs in principle. However, forecasting of new housing needs is not an exact science. It has been particularly difficult of late with complications arising from the recent recession, particularly in respect of new household formation, and short term variations in international migration into this country that are difficult even to accurately record, let alone project forward with great confidence for a number of years.
38. As a result, I have concluded that the JPU's revised total, based largely on the Cambridge work, is essentially consistent with national guidance as to best practice in this regard, and suitable for the purpose in this particular instance, having regard to the local circumstances referred to above. It also properly incorporates the level of local need for affordable housing set out in the updated 2013 Strategic Housing Market Assessment (SHMA) (J61).

39. The proposed main modifications were subject to public consultation and SA/SEA and I have taken all the responses fully into account in reaching these conclusions on this important issue. They also include a new housing trajectory to help ensure that the plan is effective and up to date (**MMs 59/60**). Nevertheless, it can only be a broad estimate of likely new housing delivery, including on the SUEs, and will have to be regularly reviewed through the JPU's monitoring process.
40. All the available evidence indicates that both the timing and total of new housing would be largely viable and essentially deliverable over the full plan period, albeit challenging for all concerned. In particular, the JPU's evidence in the Infrastructure Delivery Schedule (Appendix 4) is essentially robust, up to date and credible in these respects, with no "showstoppers" apparent in relation to the SUEs. This includes water supply, albeit continuing liaison with Anglian Water and other relevant parties will be necessary to ensure that their capital programme of improvements is aligned with the housing trajectory and delivery expectations for the SUEs in particular.
41. Whilst this conclusion is based on the current position, continuing strengthening of the national and local economy could only reinforce this judgement. I therefore conclude that the plan, as modified, would be effective in this regard. Moreover, there are also no phasing restrictions in the plan that might hinder an enhanced rate of delivery should that prove viable on any SUE, or elsewhere.
42. Overall, and taking into account all the available evidence, statements and submissions, I conclude that, as modified, the plan is based on an objective assessment of housing need in the area to 2029, taking account of reasonable population and household projections, having regard to all relevant local factors, including current market conditions in the area. The modified new housing total, extended plan period and revised housing trajectory represent a reasonable and realistic, deliverable and justified, basis for meeting local needs over the plan period. This incorporates provision for the needs of the existing local population, including in respect of affordable housing.
43. The plan would be consistent with the objectives of the NPPF in providing a significant boost to new housing delivery and in terms of helping to provide a rolling 5 year supply of sites across the area. In particular, this would be assisted by the allocation of the SUEs that are critical to overall delivery, in direct accord with the first point in para 47 of the NPPF. Through its policies, the plan would also confirm the general suitability of other sites, encouraging their early development. I have therefore concluded that, subject to appropriate main modifications that are essential for soundness, including provision of about 42,620 net new homes (**MMs 4 – 9**), as well as the identification of an additional SUE (policy N9A) (**MM 46**), the plan suitably and sufficiently addresses the objectively assessed need for housing to 2029.
44. In regard to distribution of new housing across the area, the plan logically focusses the majority on various SUEs around Northampton, by far the largest town with the most services and facilities, as well as generally good transport links and clearly the most sustainable location. Substantial new housing is also directed to the three towns of Brackley, Daventry and Towcester, albeit on a lesser scale overall, consistent with their status in the settlement

hierarchy. The general concentration of new housing on SUEs around Northampton and elsewhere partly reflects their clear potential to deliver significant numbers of new homes in a relatively short timescale, alongside the provision of necessary new infrastructure, services and facilities to support growth and help to achieve the plan's aims and objectives. Together, the SUEs help to provide an appropriate range of size and type of new housing site across the area to provide reasonable choice and some flexibility for the house building industry.

45. In these circumstances the balance of new housing between Northampton and the other three towns is appropriate, as is that between the SUEs and the rural areas, given the economies of scale and concentration of new infrastructure that are likely to assist delivery in respect of the former. These conclusions are borne out by the additional SA/SEA work and the Strategic Site Selection Report (December 2013) prepared in relation to the proposed main modifications to rectify earlier omissions. The same would not apply to a more dispersed pattern of new housing growth, incorporating smaller scale schemes at less significant settlements. Accordingly, the general distribution of housing put forward in the plan is also sound.

#### **Issue 4 – Housing Policies (policies H1 to H7)**

46. Policy H1, addressing housing density and the mix and types of new homes, is based on evidence from the 2010 Strategic Housing Market Assessment (SHMA) (GLD45) and its 2012 update (GLD50). This indicates that in order to make the most efficient use of land a minimum density of 35 dwellings per hectare is locally appropriate in all the SUEs, particularly as it has proved to be deliverable in practice in the recent past. As now confirmed by the JPU, this figure is intended to apply to the net developable area of the whole allocated site and to take into account all the other considerations listed. In such circumstances, it is not a particularly onerous or restrictive requirement overall for the developers of such large sites to meet, but is nevertheless necessary to help meet the plan's objectives, including minimising the loss of greenfield land. Policy H1 is therefore sound, as modified (**MMs 27 – 29**).
47. The Council's Viability Assessment 2010 (GLD44) and 2012 update (GLD36) essentially provides a robust justification for the percentage expectations for affordable housing in policy H2, as well as for the lower thresholds (5 or more dwellings) identified for the more rural parts of the area, in Daventry and South Northamptonshire districts. Similarly, the differing viabilities for each of the towns, including in comparison to their surrounding rural areas, is clearly demonstrated in this evidence, such that the percentages set out in the policy are seen to be reasonable in comparison to the relevant maximums that could have been sought, whilst remaining viable.
48. Having a margin of this nature reinforces the conclusion that the policy requirements are reasonable and realistic, in respect of most strategic sites at least, and also bearing in mind the continuing general improvement in the national economic situation since the report data was assembled. Moreover, the fact that the 2012 update properly took into account the additional build costs arising from compliance with the Code for Sustainable Homes (CSH) and for Zero Carbon Homes, albeit not the relatively small additional cost per unit for compliance with the Lifetime Homes standards, adds to its weight as

evidence in this particular local context. Consequently, policy H2 is judged to be sound in principle, taking into account that it includes provision for a site specific viability assessment in the event of difficulties with compliance.

49. As now worded policy H3 on rural exception sites is consistent with para 54 of the NPPF in allowing the inclusion of a minimum element of market housing, where essential to bring forward extra small scale affordable housing delivery in rural areas, if other criteria are also met. However, the future of any larger scale brownfield sites in rural areas would need to be considered in the Part 2 Local Plans, as they are not likely to be strategic in scale but would not normally fall within the specific scope of this policy either. In any event, the policy is sound as written and cannot reasonably be expected to address all possible scenarios.
50. As evidenced in the 2009 SHMA (GLD45) and the 2012 update (GLD50), significantly more housing for elderly persons will be needed over the plan period. The reasonable living standards of disabled people should also be taken into account in strategic planning policies. However, for clarity, policy H4 and para 9.20 requiring specialised affordable units to be provided as part of market housing, where necessary, and more generally as part of larger developments, including SUEs, where viable, are appropriate in principle but do not need to be in a separate policy and can be referred to elsewhere in the plan (**MM 31**). Policy H5 on sustainable housing in respect of the Lifetime Homes standards is subject to viability on a site by site basis and thus sound.
51. In order to help reduce the need for new development on greenfield sites, policy H6 seeks to safeguard the existing housing stock against loss to other uses, as well as supporting the re-use of empty homes and the regeneration of run down areas. This is consistent with policies RC1, N11 and D4 of the plan, amongst others, as well as national planning policy in general.
52. The first part of policy H7, relating to gypsies and travellers, as modified (**MMs 32/33**), sets out the identified local needs for new pitches, in accord with the 2013 West Northamptonshire Travellers Accommodation Needs Study (J62). It also identifies the basis for meeting those needs through site allocations in a Joint Local Plan that is included in the LDS (SUB12) and is underway. The rest of the policy provides a set of detailed criteria, each of which is reasonable, for the consideration of planning applications.
53. Whilst less than ideal, in that no new pitches are as yet allocated, this policy nevertheless represents an appropriate way forward in meeting gypsy and traveller needs across the area. With modifications to reflect the most recent information to both policy and text (**MMs 32/33**), it is sound.

#### **Issue 5 – Economy/Employment (policies S7, S8 and E1 to E7)**

54. The main objectives of the strategic employment policies are to retain and diversify the local economic base, whilst maintaining a broad balance between new homes and jobs. Policies S7 and S8, as modified, (**MMs 10/11/14**) therefore seek a minimum net increase of 28,500 jobs from 2008 – 2029. This reflects population projections and demographic changes in the workforce, as well as seeking to make up job losses during the recent recession from 2008 to date. The jobs total is said to be a “reference value”

for monitoring and review purposes, rather than a target as such. Nevertheless, it is realistic to expect that jobs lost between 2008 and 2014 can be replaced through a steady return to annual job growth locally with the national economy recovering, as a return to the levels achieved in the years 2001 to 2008 is not relied upon for delivery.

55. Currently, as evidenced in the WNELS 2012 Review (GLD 32) and the Employment Technical Paper 2<sup>nd</sup> Update (Dec 2013) (GLD 28), there is a significant supply of land and buildings, of almost 1.5 million square metres in total, committed for new employment development in the planning pipeline, including at Northampton as the principal focus for growth. These reports confirm that the present supply is capable of delivering significantly more than the "reference value" figure in overall capacity terms, with around 40,000 new jobs in the B class uses alone. This includes at DIRFT (policy E4) and Silverstone (policy E5), albeit both are also likely to serve a wider catchment than just the plan area in terms of new job provision.
56. Together with the renewal and regeneration of some older industrial areas, as part of the retention of existing employment land and buildings under policy E1, as well as growth in office space and non B class uses, such as retail, the plan provides an appropriate overall approach to sustaining, diversifying and improving the local economy in accord with the NPPF. This includes refocusing first on the most sustainable location, Northampton town centre and at the Northampton Waterside Enterprise Zone (NWEZ) (about 120 ha), followed by Daventry town centre to a lesser extent, in terms of high tech and office based employment.
57. It is essentially unrealistic to have specific jobs growth targets for particular sectors of the economy, as the market is inherently more flexible and the relevant technologies change so quickly, nowadays. In that context, the evidence supports the JPU's conclusion that, including existing commitments and the sites in the NCAAP, enough office space is likely to be available over the plan period such that no new strategic level provision is required. In these circumstances, other proposals for B1 office space, such as at Houghton Gate, Northampton, across the A45 from the town centre, should therefore continue to be considered on their own merits in the light of specific local needs and all other relevant plan policies, including those in the adopted NCAAP.
58. With the availability of the DIRFT III site of around 345 ha near Daventry, there is a very significant supply of land committed for B8 uses that are likely to come forward over the plan period. Nevertheless, the B8 sector continues to be successful locally and the area retains its attractiveness for national and regional logistics operators. It is also desirable to retain a range of size and type of sites for potential new businesses and the expansion of existing ones to provide local jobs, including towards the end of the modified plan period to 2029. Moreover, the "frontloading" of that supply should increase choice and provide flexibility to help achieve that aim as part of the area's economic recovery. At present, the limited availability of larger sites to meet Northampton's needs in particular is said to be inhibiting these prospects.
59. Therefore, taking into account the revised assessment of local housing needs and the modified plan period to 2029, an additional strategic employment site has been identified at J16 of the M1 (now named Midway Park by its

promoters). This is specifically intended to help meet the identified demands from existing and new local companies for further B2 and B8 space in the Northampton area. The main modifications put forward by the JPU in relation to this site are addressed in detail under policy E8. With this additional allocation, in principle, policies S7 and S8 satisfactorily reflect the overall spatial strategy of the plan, including the likely level and locations of new housing, as well as the local need for new employment opportunities, and would help maintain a broad balance between the two.

60. Therefore, subject to the necessary monitoring and review set out in the plan, the strategic employment policies should provide for sustainable economic growth and meet the objectively identified business needs locally, in accord with the expectations of the NPPF. Nor do they constrain additional job provision coming forward above the "reference value" figure for jobs in suitable locations, including in the SUEs, should that prove realistic and viable alongside new housing growth. This also takes into account the anticipated increases in jobs arising from local growth in non B use class sectors, such as retail and education, which are sustainably focused on town centres, notably at Northampton.
61. Accordingly, with essential modifications of wording for clarity of intent in relation to the minimum net figure of new jobs to be sought in policy S7 (**MMs 10/11**) and references to the NWEZ and existing business locations in policy S8 (**MMs 12/13**), both policies are sound. Consequently, with one exception at J16 M1, there is no need for the plan to identify any further strategic or out of town locations for major new employment development, beyond those already committed, in order to provide a broad balance between new homes and new jobs over the plan period. None of the further strategic employment site alternatives put forward by representors, whether related to motorway junctions or elsewhere in the area, would provide a more sustainable location than those in the plan. Those of a non-strategic scale can be considered on their own merits in the Part 2 plans, if appropriate and necessary, or in relation to specific proposals against all other relevant policies in this plan.
62. The JPU's evidence (GLD 28 and GLD 32) includes a review of all existing sites across the area and confirms that the vast majority remains suitable for continuing B class uses. Accordingly, and taking into account the natural "churn" of sites within these sectors and the provisions made in the SUEs to meet most of the new housing requirements, it is appropriate that policy E1 should seek to retain the vast majority of existing and allocated employment sites in B class uses. However, a rewording of the policy and text is necessary for clarity and to assist its operation in practice (**MMs 23/24**).
63. For office uses, with around 50,000 sq m of vacant space, the plan now seeks to refocus new provision on the central area of Northampton on a sequential basis, with a range of strategic development opportunities also identified in the adopted NCAAP, and to a lesser extent in Daventry central area. With no need for major new greenfield releases for B1 uses, policy E2 is therefore sound and compliant with NPPF guidance, such as in paras 21, 23, 24 and 161, as modified (**MM 25**).
64. As now updated, policy E3 seeks to encourage "start up" and "grow on" businesses in the NWEZ (around 120 ha), through provision of a range of unit

- sizes, and to foster the establishment of a "Technology Realm" in collaboration with relevant partner organisations, particularly the university. The available evidence indicates that this concept is realistic and viable in this location and is fully endorsed by those main parties involved with delivery, as well as clearly in accord with the NCAAP. As a result, policy E3 is also sound.
65. The plan supports further growth at DIRFT, near Daventry. This is a very large rail connected storage and distribution operations base, the scale of which is of national and regional importance as a strategic logistics centre. It has inter modal terminals to facilitate increased rail freight usage and a recent "track record" of delivery. The phase III scheme, of about 345 ha, has recently received permission under a Development Consent Order through the national infrastructure regime. The size is such that it should make a major contribution to the local and regional economy and materially reduce the need for alternative provision elsewhere, particularly for very large B8 units, as well as having an impact on the wider labour market beyond the plan area. In such circumstances, policy E4 is sound and compliant with the NPPF, notably paras 21 and 31, with modifications (**MM 16**).
66. Silverstone is the home of the British motor sport industry and a major tourism/leisure destination in its own right. The range of operations and activities clustered on site continues to expand, including for high tech businesses and as an education centre, alongside the established recreation and leisure uses that are also growing. In accord with a 2009 development brief, agreed jointly with Aylesbury Vale District Council, and a recent outline permission, policy E5 acknowledges the site's potential as a strategic employment site. It allocates land for a 40 ha advanced technology park, a further 25 ha of B class uses, a 14 ha education campus and technical college, plus hotels, leisure, conference and exhibition facilities, amongst other things.
67. The policy rightly requires the provision of significantly enhanced sustainable transport links, including to Brackley and Towcester the nearest towns, together with a detailed design and layout which respects the heritage, ecology, landscape and drainage constraints of the site. Consequently, this scheme is capable of making a significant positive contribution to the local economy in an attractive location for new businesses. Policy E5 is therefore sound, with reference to the agreed development brief retained so as to provide the full context for the proposals. This should also help to avoid possible future disputes regarding further prospects on this unique site.
68. Policy E6 supports the important role of the University of Northampton and other tertiary education providers in the local economy, as well as the development of skills and training for the resident workforce. It also properly reflects the contribution that they can make to town centre vitality and viability, such as at Northampton and Daventry, and is sound, as modified for clarity in regard to implementation (**MM 17**).
69. A sequential approach to the siting of new attractions and facilities for culture and tourism is expected under policy E7. This is in accord with the NCAAP, which has identified sites for leisure and cultural uses around the River Nene waterside and other existing policy approaches in the rural districts, including for the Grand Union Canal, the Silverstone Circuit, Towcester Racecourse and historic town centres. It applies an appropriate degree of control, whilst

offering general support for the sector's contribution to the local economy, in accord with the NPPF, and thus is sound.

70. For the reasons outlined in relation to policies S7 and S8 above, the JPU has now proposed the allocation of a major new strategic employment site east of J16 of the M1, either side of the A4500, totalling around 171 ha gross (new policy E8). This would be brought forward in phases, with the first on a roughly triangular area to the south of the A4500, bounded by the motorway and the River Nene. The latter boundary brings with it some concerns over flood risk in the south east corner of the site that would need to be addressed, including through the retention of a green corridor along the river and a sustainable drainage system as part of any detailed layout.
71. This area is also fairly flat, with a slight fall down to the river from the main road. It is largely seen in the context of the motorway in public views and contains existing non-agricultural uses and buildings on its frontage, with some large industrial buildings beyond. This contrasts strongly with the rising ground to the north of the A4500, which is principally open agricultural land and clearly of a higher landscape sensitivity to new built development. The latter area would comprise all of the proposed second and third phases of the overall scheme, including the land below the higher slopes of Glassthorpe Hill in the western part of the overall site.
72. Development of the land north of the road would have a significantly detrimental impact on the local landscape, intruding as it would into presently open countryside currently in agricultural use with inevitably large industrial and warehouse buildings. In particular, it would also be relatively close to the settlement of Harpole to the north east and lead to a materially harmful erosion of its rural setting on the edge of the town, particularly bearing in mind the other nearby developments allocated in the plan to the east and north east of the village.
73. Given the recent approval for DIRFT III, which provides major strategic opportunities to meet the local and regional needs for new B8 floorspace and has the great advantage in comparison with this site of being rail related, the likely requirement for further employment floorspace, including towards the end of this plan period to 2029, is significantly reduced. Moreover, there are acknowledged barriers to delivery of the whole J16 site, including the fact that some of the landowners involved are not committed and one is actively opposed to the scheme, as things stand.
74. In addition, for the whole site to be developed as a road based B2/B8 employment scheme, major contributions are likely to be necessary to transport and highway improvements in particular, including to the west and especially to the motorway junction itself. There is no clear evidence that an acceptable programme of works could viably and practically be delivered, taking into account the impacts of other developments committed in the plan and other road schemes, such as those on the A45 west of J16.
75. Moreover, development of the whole 171 ha site, especially for very large B8 uses, might well provide direct competition to DIRFT to the detriment of the delivery of both, potentially also discouraging the increased transfer of freight to rail. Some doubts also remain regarding the delivery of other services and

infrastructure requirements in connection with the full scheme, not least regarding two main gas pipelines that cross the site and the costs involved in either their diversion or accommodation within the layout. In contrast, a smaller scheme, limited to the land south of the A4500, is likely to prove viable in the first part of the plan period, without the need for significant highway improvements, not least at J16 itself, according to the HA, NCC and the scheme's promoters.

76. In the light of the above, only the land south of the A4500 should be allocated for new employment development in the modified plan and none of that to the north of the road, even as a strategic reserve site (**MM 26**). This would have the considerable benefit of reducing the very harmful landscape and potential environmental effects of the wider scheme on the main entrance to the town from the west, as well as that on the village of Harpole and its rural setting.
77. Bearing in mind that logistics operators seeking large sites in this area have the alternative of a major rail connected facility at DIRFT nearby, that also has good road links to the M1, there is insufficient justification in the evidence for the allocation of the whole 171 ha, or even of phase II, of this site at present. However, a lesser scheme limited to the firm defensible boundaries provided by the M1, the river and A4500 could be viably delivered on the southern part of the site only, in the short to medium term. This should ensure that sufficient new land is available, including potentially towards the end of the plan period, to meet largely non-strategic B2 and B8 use needs arising from within and/or related to the Northampton area and its economy.
78. Subject to appropriate design and layout incorporated within a suitable master plan, as required by new policy E8, employment development principally for B2 and B8 uses, at this location would represent the most sustainable means of providing the necessary additional employment land supply for the NRDA. For example, it would have good transport links with the town, including by bus and cycle. Furthermore, peripheral landscaping and greenspaces as part of the green corridor along the river should also reduce the potential impact on the village of Kislingbury to the east, to an acceptable level.
79. Although various alternatives have been put forward, including in relation to J15 and J15A of the M1, none is a realistic or more sustainable location for this plan period, given doubts over deliverability, including regarding transport implications, especially for the strategic road network as advised by the HA and NCC. Additionally, some are of insufficient size to be properly considered as strategic scale allocations, whilst others are less well linked to existing communities and would represent an even greater intrusion of built development into the otherwise largely rural countryside around the town.
80. Moreover, there are reasonable prospects that the new jobs total in the modified plan, related to the revised housing needs, can be achieved without the allocation of even the Phase 2 J16 site, or the additional reserved land, being required. Firstly, the existing land supply in the planning pipeline is already substantial, according to the JPU's evidence (see above). In addition, there are other deliverable opportunities for some smaller, non strategic scale, sites to come forward in sustainable locations within or adjacent to the present built up area of the town in the Part 2 plan.

81. In locations north east of the firm boundary formed by the motorway, such sites would not have the significant urbanising effect on the western approach to the town from the M1 that would arise from the full extent of development north of the A4500 in this location. The less extensive Phase 1 area alone would however be associated with some existing non-agricultural buildings, including a "truckstop" facility, which would limit the additional impact of new employment development on the south side of the road only, given its existing relationship with the motorway (**MM 26**). This would also need to be reflected on the Policies Map for soundness and clarity.
82. Any attempt to devise an appropriate form of words within policy E8 seeking to restrict the site to only locally based companies is unlikely to prove practical or realistic when individual proposals are assessed. At best, it would be a source of unnecessary delay, at a time when new business investment decisions usually have to be swift, whilst compliance or otherwise of the detailed criteria was assessed. At worst, it might deter some operations that may be suitable for the site in all other respects from pursuing their interest, due to doubts about eligibility, to the detriment of local job provision and the local economy more generally. It would also not be compliant with the NPPF guidance on clarity and implementation.
83. Therefore, both the new policy and its supporting text should be expressed in a less complex form, with fewer and less detailed criteria to be met. Nevertheless, the need to restrict B1 development here to avoid diluting the appropriate strategic focus on the most sustainable location of all, in Northampton town centre, means that the upper limit on new office and related space should remain at 1,000 sq m, as proposed by the JPU. Similarly, so that the site is best able to fulfil its primary purpose as a local "reservoir" of new land for the needs of the NRDA over the plan period, rather than attracting "footloose" major national logistics operators, the upper size limit for new buildings of 40,000 sq m should also remain part of the new policy (**MM 26**). With these further changes, the modified policy would be sound.

#### **Issue 6 – Built and Natural Environment (policies BN1 – BN10)**

84. This suite of policies addressing all aspects of the built and natural environment is supported by a robust and comprehensive evidence base. It is also consistent with the core land use planning principles in the NPPF, as well as the plan's spatial objectives and policies S10 and S11 relating to energy and sustainable development. With the minor changes made by the JPU and the introduction of new policy BN7A, relating to water management, the policies are endorsed by the EA, NE, EH, NCC and Anglian Water, amongst others. The new policy is necessary so as to properly reflect the recent Water Cycle Study (GLD64). In addition, as the JPU now proposes, in order to make clear the need to protect aged and veteran trees, wherever possible, policy BN3 needs to be amended to include specific references thereto (**MM 34**).
85. Regarding policy BN4, the 250m zone defined in Figure 7 around the Upper Nene Valley Gravel Pits only requires an assessment of the detailed effects of any development proposals on the sightlines for the main bird species using the SPA and Ramsar site designations. It is not a preclusion of, or even a presumption against, new built development in the zone, but rather a sensible and practical application of policy requirements to ensure that no material

harm arises in respect of this important nature conservation interest on and around the designated sites. None of the alternative methods suggested to address this would operate on such a clear and consistent basis. Taking into account the detailed and relevant technical evidence on which the zone is based (GLD 66), the endorsement of NE for this aspect of the policy and its intended application in development management terms, policy BN4 is sound.

86. In relation to policy BN5, the JPU now proposes that the wording be amended to reflect the concerns of EH, by adding a reference to the settings of historic assets, with equivalent additions to SO16 and policy S10, for consistency with the NPPF (**MMs 35/36/37**). Given that policies E7 and E9 (plus Appendix 28) of the Northampton Local Plan (NLD 27) (1997) will continue to be saved after adoption of the JCS, it is appropriate that their longer term relevance and application to any specific schemes is considered in the relevant Part 2 plan, rather than this one, and at the more local level rather than the strategic one.
87. Policy BN6 now provides a suitable and satisfactory policy background, based on rational and reasonable objectives, for the consideration of proposals for the future of the Weedon Depot site, as supported by EH.
88. The evidence base for policies BN7 (flood risk) and BN7A (water supply, quality and wastewater infrastructure) includes the SFRAs 1 and 2 (GLD59, GLD60 and GLD62), as well as the West Northamptonshire Water Cycle Study (GLD61 and GLD64). The latter has also led to the inclusion of a locally based design standard for the Upper Nene Catchment, through and upstream of Northampton, to help protect the town from flooding. This takes into account the major improvements to the defences along the river since the 1998 floods. With the further modifications now proposed by the JPU (**MMs 38/39**), both policies would be consistent with the NPPF (paras 104-108) and the NPPG guidance on flood risk, as confirmed by the support of the EA, amongst others. Accordingly, they are sound.
89. Policy BN8 reinforces the strategic value of the River Nene corridor as part of the county's green infrastructure network, with its own leisure and environment framework plan (GLD65) that the policy complements and is intended to help deliver. It is flexible, rather than prescriptive, recognising the potential of some riverside areas for new development where appropriate, and sound in all respects.
90. Policy BN9 on pollution control seeks to ensure that all new development minimises and, where possible, reduces pollution levels, such as in relation to air quality, in accord with national guidance. In the absence of any evidence to the contrary, it is considered reasonable, robust and requires no changes.
91. Given the known presence of areas of ground instability across the county, notably on slopes of greater than seven degrees for geological reasons, policy BN10 properly requires a ground stability report with all development proposals in those localities. This is entirely logical and should help ensure that relevant local concerns are taken into account in the design and layout of schemes and that appropriate engineering solutions and construction techniques are used, where necessary. That being so, the policy is sound.

## **Issue 7 – Infrastructure and Delivery (policies INF 1 and INF 2)**

92. The JCS's approach to infrastructure delivery seeks to ensure that all new development is supported by the timely provision of the necessary investment in new physical, green and social/community facilities, services and networks. This is appropriately evidenced in the IDP, as updated in 2012 with the 11 key primary infrastructure projects needed to deliver the overall strategy suitably listed in Table 7 of the plan, as modified (**MM 40**). Acknowledging that some elements of infrastructure are at or close to capacity, measures such as modal shift to help create more sustainable travel patterns are also necessary if the plan is to deliver its objectives by 2029. In this respect, the IDP is intended to be a "living document" to be monitored and updated, when necessary, to reflect local circumstances as they develop. Given that it takes into account the contributions of various service providers and organisations, the IDP will play an on-going, co-ordinating, role for the various agencies involved, as well as for the Council.
93. Policy INF 1 properly requires developers to demonstrate that infrastructure provision will be made in connection with new developments, whilst para 11.17 suitably lists and defines the main types of infrastructure to which contributions should relate. Subject to the statutory tests set out in para 11.23 and to individual, site specific, viability testing if necessary, this approach is sound.
94. In respect of policy INF 2, the 11 key primary infrastructure projects are listed in modified Table 7 (**MM 40**). 4 relate to the waste water treatment network, whilst 7 concern transport. This includes 6 road schemes and one regarding an improved public transport interchange at Castle Station in Northampton. The JPU's evidence clearly justifies the selection of these schemes as the most relevant to the successful implementation of the overall strategy.
95. The IDP itself includes further reasoning as to why these projects are deemed necessary, together with sufficient detail for a Part 1 Local Plan of timing, phasing, costs and funding sources. It also provides evidence that the level of housing growth envisaged in the plan can be suitably served with appropriate infrastructure, services and facilities over the plan period, albeit some flexibility remains within the overall housing trajectory to take account of possible delays or changes to individual elements. Also, the total number of SUEs, such as around Northampton provides some flexibility in the event that one or more do not deliver as currently expected, for whatever reason.
96. Whilst some respondents are understandably concerned about the continuing availability of public funding for major infrastructure projects, especially new road schemes, the firm commitment of the various Councils and their partners, including the HA, is clear. This includes in respect of the Northampton Growth Management Scheme for the A45 between M1 J15 and Great Billing.
97. This conclusion is strengthened by the decision of NCC to introduce their own innovative funding arrangements in order to bring forward the delivery of strategically important new road projects, notably the Daventry Development Link, on an economically viable basis. Moreover, some key primary infrastructure projects, such as Castle Station in Northampton are already underway, or have been completed, such as Northampton Bus station and the Weedon A5/A45 cross roads improvements, whilst others have funds formally

committed.

98. Given the inevitability of site specific viability testing in relation to each of the SUEs, due to their scale and significance for the provision of new housing, there is no need for separate policies or criteria, in relation to the delivery of infrastructure between the SUEs and all other developments in the area. Therefore, in conclusion, policies INF 1 and INF 2 are, in principle, sound with realistic prospects that they will assist the delivery of an effective plan. They should help to ensure that sufficient resources are available to provide the necessary infrastructure, of all types, to support the levels of new housing and other development envisaged in the plan.

### **Issue 8 – Transport (policies C2 – C6)**

99. Despite the generally acknowledged “good connectivity” of the county, partly reflecting its central location in the country, material changes in local travel behaviours, as set out in policies C1 and C2, are essential if significant parts of the local road network are to cope with the levels of growth envisaged. This is particularly so in and around the four main towns, where challenging “modal shift” targets need to be met in relation to existing development, and even more so for new schemes. Whilst these targets are ambitious (5% shift from private cars for existing and 20% shift from all new developments), as is the equivalent one for increased bus usage, a series of “soft measures” or “smarter choices” offers reasonable prospects that they can be delivered over time, alongside other important infrastructure investment.
100. For example, there are also some key road schemes that need to be completed, such as the Northampton orbital links, the Daventry Development Link (formerly referred to as the Flore/Weedon bypass) and the Towcester Relief Road, if the overall strategy is to be delivered over the plan period, as referenced in policy C3. In addition, the Northampton Growth Management Scheme (NGMS), jointly agreed by the HA and all the relevant Councils, seeks to manage the impacts of increased traffic on the A45 between J15 of the M1 and Great Billing. This includes through specific junction improvements to enhance capacity and reduce delays along the route, to be funded in stages with contributions from various developments.
101. Policy C3 also appropriately offers general support in principle for freight on both the canal and rail networks, plus enhanced rail services for passengers, as well as to and from DIRFT. However, decisions on the long term prospects for and best use of any spare capacity on the rail network once HS2 has been completed are for the future and at a national level, rather than this plan. This includes in respect of what opportunities might or might not exist for increased rail freight facilities in the locality as a result.
102. Taking into account the general endorsement of the plan's transport objectives and proposals by the HA and by NCC as the local highway authority, in the light of all of the above policies C1 – C6 and policy N12 relating to Northampton are sound, as modified (**MM 47**), and accord with the NPPF (chapter 4) and the Northamptonshire Transportation Plan (March 2012).

### **Issue 9 –Northampton North (policy N3)**

103. As modified, proposals for this SUE now involve around 3,500 new homes with

associated services and facilities, including for primary education and a local centre, to the east of the A43 on the northern edge of the town. With Moulton to the west, Overstone and Overstone Park to the east, Southfields and the Round Spinney Industrial Estate to the south, the site is quite well related to the present built form of the town and on a main arterial route.

104. Although it would extend development out into the countryside in a somewhat linear fashion along the A43, the land form is reasonably well contained, including by established groups of trees, some of which are subject to TPOs. Accordingly, most of the site is considered to be of low/medium sensitivity to built development in landscape terms (GLD58 - fig 24), whereas much of the area to the north of Moulton that has been put forward as an alternative SUE location is more detached from the existing urban area and of medium/high landscape sensitivity. It would also result in a greater erosion of the gaps between settlements in the area to the overall detriment of the character and appearance of the locality on this side of the town.
105. Overall, the area subject to policy N3, as modified, is judged to be of lower environmental value than much of the land around the peripheries of the town, despite the presence of a LNR (Crowfields Common) and a LWS (Cowpasture Spinney). Together with the provision of greenspaces and wildlife corridors, as part of the comprehensive masterplan that policy N3 requires, it should also be possible to establish a firm new boundary to the north for this scheme, in order to limit the intrusion of development into the open countryside. Such measures should also help to ensure the continuing separate identity of the villages around the site, albeit with good transport links to enable the shared use of facilities and services, where appropriate.
106. There are sand and gravel reserves present on part of the site and these would need to be subject to early testing of their viability for extraction to avoid delays to delivery. Should it prove viable it should be possible and practical to incorporate prior extraction of any suitable mineral resources into a phased programme of development on this large site, with the potential for the products to be used on site in that event.
107. The size of the scheme in the modified plan should also enable the provision of a sustainable travel system for the site, incorporating a local multi modal interchange with car and cycle parking to enhance public transport services as part of the masterplan. Nevertheless, it is clear that significant contributions would also be required for highway improvements at Round Spinney roundabout and on the A43 corridor in particular.
108. Indeed, NCC argues that a much greater level of new housing should be planned here so as to help fund more of the work sought in the Northamptonshire Arc (July 2011) and Northamptonshire Transport Plan (March 2012) documents to dual the key strategic road corridor from Northampton to Kettering. However, local residents and others have understandable concerns about the potential traffic implications for nearby villages (such as Moulton to the west and Overstone to the east) of this scheme, let alone more, particularly on a cumulative basis when other committed projects on this side of the town are also taken into account.
109. The A43 cannot realistically be materially improved on its present alignment

alongside the southern part of the site, which is the most congested part of the route at present. Consequently, it is appropriate that a new road through this area should act as a bypass for this section of the main route, thereby providing a benefit to many existing local residents, as well as road users, at an early stage of the development process.

110. An over concentration of development, and of new housing in particular, on this side of the town, would not only imply risks to achieving delivery of the overall totals deemed necessary, but also have negative implications for the planned phasing of the NNW bypass scheme, that would not necessarily be fully mitigated by an increased level of contributions from a larger scheme. Accordingly, the modified plan strikes the right balance between making the best use of the site available for new housing and related development, without undermining its realistic potential for delivery over the plan period in this location.
111. Given the requirements set out in policy N3, including the public transport contributions, A43 corridor mitigation measures, new road through the southern part of the site and improvements to Round Spinney roundabout, the scheme should prove acceptable, in principle, in transport and highway terms. The innovative funding project adopted by NCC for the A43 improvements, amongst other schemes, should also help early provision of the essential road improvements as part of the first phase of the SUE delivery. Nevertheless, there will be some implications for the local road network that will need to be carefully monitored over time. Additional measures may be necessary in the event that unforeseen consequences arise, including possible "rat running" through villages at peak hours by commuters from further afield.
112. Proximity to the heritage assets in nearby settlements can be suitably and satisfactorily addressed through the detailed layout and built form of the scheme, including by the new road network directing traffic movements largely away from village streets. Taking into account the presence of existing employment opportunities nearby, as well as those to be made available on site as part of a comprehensive masterplan for a mixed use development, as well as the provision of good public transport links to the town centre, albeit about 4 miles away, this site is suitably located to function as a SUE.
113. The involvement of a major national house builder, keen to commence on site and confident of the economic viability of the overall scheme, notwithstanding the list of contributions and requirements in the relevant plan policy, is further evidence that the proposals are realistic and deliverable over the plan period. They can make a significant contribution to the level of new housing required to meet the plan's objectives. Nor is there any firm evidence that any larger scheme would necessarily be more readily or more quickly deliverable, or more viable overall and therefore able to provide a higher level of affordable housing on site than likely to result from the SUE proposals as now envisaged in the modified plan.
114. Since the plan was submitted, it has emerged that the proposed "Technology Realm" scheme would be more suitably and viably located in the town centre, in direct association with the University's new site, and that a full scale "park and ride" facility is not required in this location, as confirmed by NCC. Modifications to policy N3 to these effects, as well as to reflect the extended

site and increased number of homes, are therefore necessary for clarity and to facilitate implementation (**MMs 41/42**). With these modifications, policy N3 is sound.

### **Issue 10 – Northampton West (policy N4)**

115. Lying to the west of the existing urban area adjacent to the communities of Duston and New Duston, this SUE represents an expansion of Northampton onto presently greenfield land. The site also lies to the west of the Sandy Lane Relief Road (SLRR) that forms part of the North West bypass route and has previously been thought of as the western boundary of development on this side of the town.
116. However, the degree of intrusion into open countryside is limited by its location largely within a natural landscape bowl that reduces its sensitivity to new building, as recognised in the Northampton Landscape Sensitivity and Green Infrastructure Study (GLD 58 fig.24). The land around is largely of higher sensitivity. New strategic and peripheral landscaping, incorporating established hedgerows, as well as the location of green spaces within the overall layout, particularly south of Roman Road, should reinforce this physical containment and visual separation as part of an approved masterplan.
117. Whilst relatively close, these elements should ensure clear separation of the SUE from the nearby villages of Upper and Lower Harlestone to the north west and Harpole to the south west, enabling those settlements to essentially retain their separate identities in a more rural setting. The distances involved are such that the various heritage assets in those villages, including listed buildings, need not be materially affected by the proposals.
118. As submitted, policy N4 provides for a SUE of around 1,500 new homes, plus a primary school and local centre that would require good links across the recently built SLRR in order to integrate with the existing communities and utilise some of their present services and facilities, such as the secondary school. However, in the light of the revised assessment of local housing needs, this site has been judged as capable of delivering more housing over the plan period and the additional SA work has confirmed that no significant negative impacts would arise from such an increase, including the extension of the site area to the south across Roman Road.
119. In traffic and highways terms, NCC is satisfied that the scheme could be principally served by a new connection at the existing junction of the SLRR with Weggs Farm Road, to also link with the main urban area. This has been confirmed in the Northampton Multi Modal Study Update (Feb 2011) (NLD 13), which also concludes that there is no need for this scheme to make a financial contribution towards improvements at the Cock Hotel junction (**MM 43**).
120. The local road network, as recently improved, is now such that even with the increased level of new housing envisaged in the modified policy (2,550 homes) the traffic movements likely to be generated should be safely and satisfactorily accommodated, albeit financial contributions to necessary improvements are clearly required from the development to ensure this outcome, including in respect of further progress on the bypass for this side of the town. Subject to suitable junction designs and the provision of appropriate additional links

across the SLRR for walkers and cyclists in particular, the proposals are therefore sustainable in overall transport terms.

121. Suggestions that this SUE should be significantly expanded, for up to 5,400 houses, are not realistic in view of the relevant factors referred to above and the major increase in services and infrastructure provision that would be required locally for it to be sustainable. Moreover, it would materially risk exacerbating existing concerns regarding the balance of new development on the respective edges of Northampton. This could potentially create an over concentration on the west of the town and possible market saturation in relation to other committed and allocated schemes. Additionally, irrespective of all other potential advantages and disadvantages, a further major expansion of the modified SUE is not currently necessary to meet needs.
122. Employment opportunities for new residents would be reasonably close at both Lodge Farm Industrial Estate to the north east and the Swan Valley employment area to the south. The SUE would also be reasonably well connected to the town centre, including by public transport, where major new job provision is envisaged over the plan period. Consequently, it is not essential that further new employment provision is made onsite as part of this scheme, beyond that associated with local services and facilities.
123. Mitigation measures to retain the general biodiversity interests of the flora and fauna on the site would be necessary as part of any masterplan, together with structural landscaping, green/open space provision and the creation of habitat corridors to improve ecological diversity, if possible. Notwithstanding, there are no overriding environmental constraints that would preclude development, as acknowledged in the relevant SA work, and no serious technical or practical issues to be overcome in developing the site, particularly as there are no areas of strategic flood plain.
124. Regarding delivery, a national house builder is already closely involved and keen to proceed. This is on the basis that the level of infrastructure requirements in policy N4 is reasonable and realistic and that a suitable range of new housing can be brought forward viably as part of a comprehensive scheme on the extended site for around 2,550 new homes. However, given the proximity of the land south of Roman Road to the village of Harpole and its generally greater prominence in the local landscape on this side of the town, the main modification to extend the SUE into this area and materially increase the number of new units has given rise to increased concerns over potential impacts, including on Harpole in particular.
125. Consequently, in order to help ensure that the village retains its separate identity from the main urban area of the town and its setting within the countryside, new housing should principally be built to the north of Roman Road. The part of the site to the south should be the location of the new primary school, playing fields, allotments and other main green spaces needed within the overall scheme, rather than new housing, so as to reduce the visual and landscape impact of new development on this less well contained part of the site, as part of the comprehensive masterplan, and better reflect plan proposals for development on other nearby sites, particularly in policy N9A.
126. A further modification to this effect is therefore required to add – “with new

housing principally to the north of Roman Road" (**MM43**). In conclusion, despite extending into presently largely open countryside and using greenfield land, subject to the above, this SUE would be suitable, satisfactory and sustainable as part of the overall expansion of Northampton envisaged in the plan, including in respect of prospective relationships with Harpole and Harlestone. As further modified, policy N4 is therefore sound.

### **Issue 11 – Northampton King's Heath (policy N7)**

127. Also known as Dallington Grange, this site is, primarily, a longstanding allocation for development, having been included in the Northampton Local Plan (1997). Whilst an area of archaeological interest to the north west requires further investigation and potential mitigation as part of any masterplan, there are no significant constraints to the proposed delivery of about 3,000 new dwellings, with a secondary school, two primary schools, a local centre and around 10ha of employment adjacent to Lodge Farm. Access is to be taken from various points, including the new NNW bypass, to which financial contributions will be required as part of the development.
128. Given the above, an early start to construction is confidently envisaged, with housebuilders directly engaged and detailed proposals under negotiation. This should not only help the delivery of the new housing in accord with the plan's trajectory, but also assist the regeneration prospects of the wider King's Heath area nearby. Policy N7 is sound.

### **Issue 12 – Northampton South (policy N5)**

129. Sited between the existing built up area of the town at East Hunsbury to the north and the M1 motorway to the south, with Collingtree to the east, this proposed SUE is capable of delivering around 1,000 new homes, a primary school and a local centre in a sustainable location. It is well contained within those features in landscape terms and therefore of relatively low sensitivity in regard to the potential visual impact of development in the locality, albeit with open fields to the west up to the railway line.
130. Whilst an extension of development further west may be feasible in the longer term and could be considered in the Part 2 plan, at present there is little firm prospect of a suitable vehicular access being made available across (over or under) the railway line at an economic cost. Nor are all the relevant landowners involved as yet. Moreover, any scheme that does not involve a vehicular access to Rowtree Road to the north is likely to be poorly related to the existing community at East Hunsbury and its existing services and facilities. The current size of the site is such that it should be possible to provide a mix of size and type of new units, including affordable housing, without any extension or a material delay whilst the scheme is significantly revised. At best, pursuing the land to the west as an alternative or part alternative to the identified SUE would introduce material delays to delivery whilst these difficulties were resolved, if indeed they can be on a viable basis.
131. A number of practical, technical and environmental issues regarding the prospects for this site have been raised in representations from nearby residents and others, not least in respect of flood risks. The Wootton Brook, running east-west through the golf course that forms part of the site and

adjacent to existing housing in Collingtree Park, has been the main source of fairly regular localised flooding problems in recent years, including notably at Easter 1998. Clearly, new built development here needs to properly address this issue and, preferably, to achieve an overall positive impact on local flood risks, if at all possible. The last part of policy N5 therefore rightly requires that the scheme provides a suitable flood risk, including surface water, management scheme from all sources, as part of a comprehensive masterplan, for the site.

132. The relevant evidence, including from technical work done to date, indicates that a reconfiguration of the golf course layout, localised channel improvements to the Wootton Brook, provision of green spaces in certain locations and management of surface water flows to Collingtree Park (Turnberry Lane and Belfry Lane area), together with a legal agreement relating to on-going maintenance, should enable a sustainable urban drainage scheme to deliver significant overall improvements, compared to the present position, in relation to flood risks. This would include for existing residents in Collingtree Park and others around the site, as well as taking into account the latest EA guidance, the 1 in 200 year flood risk standard for Northampton, and climate change considerations. The fact that the EA and NCC, as well as NBC, all essentially endorse the intended scheme reinforces this judgement, which is also in accord with other plan policies, such as BN7.
133. Concerns over potential traffic problems, particularly on Rowtree Road, are understandable with a scheme of this scale. However, funds from the development will be provided to deliver local road and bus service improvements, as well as towards the programmed works on the Wootton Interchange as part of the NGMS (GLD 24). Together with other measures envisaged under other plan policies to help achieve "modal shift", these should be sufficient to deliver a suitably integrated transport network to satisfactorily serve the site for the scale of development planned, albeit the overall targets are acknowledged to be challenging.
134. Proximity to the M1, particularly along the site's southern boundary, also means that the master plan, including in relation to layout and built form, has to resolve detailed design issues regarding noise and air quality, in order to achieve a satisfactory living environment for new residents. This includes through the disposition of structural green spaces across the site and the provision of a substantial landscape buffer to the M1 itself on the site's southern boundary. Investigations to date demonstrate that such considerations can be fully and appropriately taken into account, whilst allowing development to proceed, as recognised by the environmental health department of NBC.
135. The site layout also needs to retain key habitat features, including the defined County Wildlife Site on part of the area, as well as providing wildlife corridors as part of the open space elements in the masterplan. Similar considerations clearly apply in respect of areas of identified archaeological interest. Both matters are suitably recognised in the relevant parts of policy N5, which requires the necessary assessments and mitigation, if appropriate, given that neither is an overriding constraint to development.
136. There are relatively steep gradients in the central part of the site and thus

ground stability concerns with a risk of solifluction or landslips if suitable measures, including through detailed layout and appropriate construction techniques, are not utilised. However, these issues are well known locally, with established techniques for minimising risks and consequently this constraint, whilst highly relevant, does not mean that the site is unsuitable in principle for a SUE, or even that the costs of addressing it, where necessary, would render the site economically unviable. None of these constraints, either individually or collectively, is sufficient to render this site unviable or unsuitable in principle for a SUE.

137. In fact, a national house builder intends to proceed and considers the site to be viable and capable of delivering around 100 homes a year, with an early start envisaged to assist the plan's housing trajectory and particularly the land supply position in the NBC area. None of the infrastructure requirements under policy N5 or other policies in the plan to bring forward this site on a sustainable basis would be so onerous as to alter that conclusion in this relatively high value location. This is so with or without any element of new employment provision which is not essential in this particular locality as it is fairly close to a number of existing employment areas and to the town centre.

138. In short, this is a suitably located and well contained site that is physically capable of delivering a SUE, starting in the first part of the plan period. Subject to appropriate detailed design and layout, it should relate well to the existing housing nearby in visual and physical terms and provide positive impacts overall, as noted in the SA, including importantly in respect of local flood risks. Accordingly, policy N5 is sound.

### **Issue 13 – Northampton South of Brackmills (policy N6)**

139. This site is well related to the existing built up area on the south eastern edge of the town with existing housing to the west and south and close to the substantial Brackmills employment area to the north. A SUE here would provide a new local centre, primary school and medical facilities, as well as new housing. The scale is such that a mix of size and type of new homes should prove deliverable.

140. This would include an appropriate percentage of affordable housing, in accordance with policy H2, together with a park, allotments, informal green spaces and sustainable drainage features. In addition, a green corridor running roughly north west to south east across the site, plus peripheral green spaces would help to define but also soften the edges of the development, especially to the east where it would adjoin open countryside.

141. The local landscape sensitivity of parts of the site can be addressed and partly mitigated through such measures, together with the backdrop of woodland to the north, which forms a strong local landscape feature, as part of a comprehensive masterplan for the whole site. The masterplan should also take into account the potential skyline views of buildings on the site from the north and east, as well as the retention, if at all possible, of existing footpaths, Landimore Road and the minor road within the site to help integrate the scheme into its surroundings. As a result, the development should not materially threaten the separate identity of the settlements of Hardingstone and Wootton.

142. The understandable concerns of local residents regarding possible flood risk, noise, air quality, ground stability and traffic generation can all be satisfactorily addressed through appropriate technical analysis and on site measures, as well as contributions to offset impacts elsewhere. This should include through a full Transport Assessment looking at all traffic movements likely to occur on the local road network in the context of the agreed NGMS for the A45 route. Consequently, none are sufficient, individually or collectively, to indicate that the site is unsuitable in principle for a SUE.
143. Regarding retail provision as part of the scheme, the reference in the revised policy wording is inherently more flexible, and therefore suitable and appropriate, than any specific upper limit on floor space, as previously proposed. Use of the word supermarket as an alternative would make little or no practical difference. The details can then be resolved in the context of a masterplan or planning application once the specific contents of the remaining elements of the overall scheme are known. Accordingly, no further change to the policy is required.
144. Most of the site is presently owned by the Homes and Communities Agency (HCA) and forms part of their accelerated disposals programme to assist the delivery of new housing nationally. The remainder is owned by a national house builder that is "ready, willing and able" to proceed as soon as possible. In such circumstances, this site is clearly able to have an early start to delivery and to make a material contribution to the plan's new housing trajectory accordingly. This conclusion is supported by the fact that extensive public consultation has been conducted locally in respect of specific proposals by the HCA and prospective developers.
145. Taking into account the positive outcome of the revised SA, that did not identify any material constraints in relation to the higher number of new dwellings regarding the extension of the originally identified site to the south east, the site is suitable in principle to accommodate a SUE and for about 1,300 rather than just 1,000 new homes (**MMs 44/45**). This would also accord with the earlier Northampton Longer Term Growth Options Study (GLD 2). Policy N6 is therefore sound, as modified.

#### **Issue 14 – Northampton North of Whitehills (policy N8)**

146. This site, also known as Buckton Fields, is carried forward as an allocation for development in the JCS from the Daventry District Local Plan. In the absence of firm evidence to the contrary, it remains suitable, in principle, to deliver around 1,000 new homes, plus a primary school, a local centre and employment opportunities on about 50ha. This is so providing that suitable investigation of the archaeological potential and ecological interests of the area takes place first and is fully taken into account in any masterplan, with appropriate mitigation, if necessary, delivered alongside the development.
147. Also, importantly, local concerns relating to traffic generation and the effects of the scheme on the surrounding highway network need to be adequately addressed through financial contributions towards road and junction improvements nearby, including in respect of the NNW bypass scheme, and in the context of the overall programme for such projects on this side of the town. I note that NCC has stated publicly that the part of the site presently in

their ownership (around two thirds) will not be sold until satisfactory arrangements are firmly in place to ensure that the necessary highway and other transport improvements associated with this scheme will be delivered at the appropriate time. This provides some further reassurance regarding the suitability and sustainability of the scheme in principle and the mitigation of its local impacts, while not delaying the start of development on the other part of the site, which is necessary if the plan's new housing trajectory is to be met.

148. Subject to these provisos, this allocation is considered viable and appropriate, as well as capable of early delivery in part, with prospective developers directly involved and seeking to proceed. Policy N8 is sound accordingly.

### **Issue 15 – Northampton Omission Sites**

149. In the light of the JPU's revised assessment of housing needs, all reasonable alternative/additional prospective SUEs around Northampton (and elsewhere) that could potentially be delivered up to 2029 and shortly beyond have been subject to satisfactory SA/SEA work by the JPU's consultants in 2013. None has emerged as a more sustainable option in principle than the SUE allocations in the plan, as modified, in that context. Moreover, the revised level of new housing required over the plan period, whilst challenging, is deliverable on the allocated sites without the need for further allocations or additions/extensions to the already identified areas to assist.

150. In such circumstances, the potential advantages and/or disadvantages of all the other sites proposed by representors around the town are essentially matters for consideration in the context of a future review of the plan, or the Part 2 plans if at the non-strategic scale. Nevertheless, it remains necessary to address whether or not those strategic size sites put forward would be more suitable than those allocated in the plan.

151. For example, a significant extension of, or an alternative to, the Northampton North SUE (policy N3) to the west of the A43 and relating to the village of Moulton is not necessary during this plan period, even if development on the overall scale proposed were to be deliverable, which remains unproven at present. This judgement applies irrespective of potential local highways, health and education benefits that might arise, such as for Moulton College, particularly in the light of the transport and traffic implications for the wider network, including the NNW bypass scheme, that have yet to be fully assessed. Similar concerns apply in respect of unresolved local services, facilities and other infrastructure requirements for such a large scheme.

152. Nor, given its relative distance from the town centre and indirect relationship with the existing urban area, is it a more sustainable option than those allocated in the modified plan as it would be, effectively, more of a major expansion of Moulton village rather than a SUE or urban focussed growth. This applies whether or not the proposals are considered as an alternative or an addition to policy N3 of the plan and is reinforced by the outcome of the revised SA/SEA work in the light of the revised level of new housing needs.

153. In contrast, the site at Holly Lodge Drive, south east of Boughton, is more sustainably located in relation to the present built up area of Northampton and relatively so to the town centre. However, with no developer involved as yet,

there is no firm evidence that it is currently deliverable as a SUE or particularly that initially identified constraints, including ecological and archaeological interests present on the site, could be overcome or suitably mitigated as part of a comprehensive scheme.

154. Notwithstanding the potential reinstatement of a village green as a means of reducing potential coalescence with Boughton, this land cannot be considered as a realistic alternative to the SUEs identified in the modified plan. This is so at least until considerable further technical investigations have been completed in relation to the above factors and others, including services and infrastructure, notably regarding road access and related highway issues.
155. Land to the east of the allocation south of Brackmills in policy N6 of the plan would potentially be capable of delivering a further 1,000 or so new dwellings, as an addition to the identified SUE, together with additional facilities. With vehicular access from the south off the B526 road to Newport Pagnall and a clearly defined eastern boundary along the Preston Deanway to Great Houghton Road, the site would also be close to existing employment opportunities at Brackmills and Rushmills.
156. However, in the absence of a full technical assessment of potential constraints, including regarding infrastructure and services, and in relation to delivery prospects over the plan period it does not represent a clearly preferable alternative to any of the other allocated SUEs around the town. It would also involve the unnecessary loss of greenfield land, with an associated landscape intrusion into open countryside on an otherwise fairly rural edge of the town.
157. Land to the east of Wootton is physically capable of providing a new neighbourhood of over 1,000 new dwellings, together with associated services and facilities, around the Caroline Chisholm secondary school. Also close to existing employment areas, it forms part of a prospective larger SUE that was considered in the earlier versions of the JCS but omitted prior to submission. Whilst in a reasonably sustainable location relative to the present urban area and to the town centre, development here has previously been assessed in the SA/SEA work (GLD 12) (Feb 2011) and SA Addendum (J59) as bringing significant risks of harmful effects on the integrity of the Upper Nene Gravel Pits SPA nearby, notably in respect of potential encroachment on support sites to the SPA. However, following discussions, NE's latest view, based on previous survey work and the relative distance from the SPA, is that the allocation of the site would represent a relatively low risk in terms of HRA.
158. The potential direct traffic impacts arising from this site on the key Wootton Fields Interchange on the A45 have not been taken into account in the NGMS. NCC as the local highway authority is not satisfied that a practical affordable solution to provide the necessary junction improvements to resolve this matter is deliverable, particularly regarding peak hour movements. Consequently, in the light of all of the above, land east of Wootton cannot be considered as a preferable or more sustainable option than those SUEs allocated in the modified plan. Concerns about an over-provision of new housing on this side of the town leading to an element of market saturation in comparison to other parts of the area are also relevant in this context. This is so even for a smaller scheme than originally envisaged. On balance, the potential shorter term deliverability of this site is outweighed by these factors for the present plan

period.

159. Therefore, overall, it does not represent a more sustainable alternative than the SUE sites identified in the modified plan, given the loss of greenfield land and likely effects of new housing on the gently undulating landscape in the vicinity that makes a positive contribution to the town's setting from this direction. The absence of a firm eastern boundary also risks setting a form of precedent for further development in that direction in the future. These conclusions are not altered by the fact that planning permission has been granted for around 300 new homes at the northern end of the proposed site.
160. In conclusion there is no necessity for further plan modifications to allocate any additional or further extended SUE sites around Northampton to meet the objectively assessed need for new housing up to 2029.

### **Issue 16 – Rural Areas (policies R1 to R3)**

161. In the rural areas policy R1 provides a basis for the definition of a settlement hierarchy in the subsequent Part 2 LPs. Effectively, this includes four tiers, with first primary and then secondary service villages, third other villages below, and finally all other smaller settlements, such as hamlets with no or very limited services, that are not to be listed/named at all in the hierarchy. The JPU's evidence in the Village Services and Facilities Technical Paper (GLD 3) (Feb 2011) is generally agreed to represent a "snapshot" only and to contain minor errors. A new survey is needed to inform the Part 2 LPs. Nevertheless, it suitably demonstrates the logic of such an overall approach in this area.
162. Given that the allocation of particular settlements to each level and the distribution of development across the hierarchy and each district are matters for the Part 2 LPs, the principle of a consistent hierarchy is sound. Moreover, the criteria listed to identify settlements at each level are sufficiently clear and comprehensive, whilst not being entirely prescriptive in nature. In common with all the other discrete rural settlements outside towns, the allocation of the village of Great Houghton within Northampton Borough to a particular category in the hierarchy is a matter for a Part 2 LP, rather than this one.
163. However, the Part 2 plans need to have sufficient flexibility to reflect specific local circumstances, including constraints and opportunities, in respect of the provision of new housing in rural areas, to bolster that coming forward in and around the towns. Therefore, it is neither necessary nor desirable that the JCS should seek to impose even indicative percentages that seek to control the distribution of new housing across the rural areas and/or the total level of new housing in any individual village or level of the hierarchy. This is a matter best considered in the more detailed context of a Part 2 LP, when all relevant local circumstances, including the realistic capacities of suitable sustainable sites, can be more fully taken into account, together with the new village facilities survey referred to above.
164. With that in mind, certain parts of the policy and supporting text need to be omitted so that it is positively worded overall, in accord with para 54 of the NPPF and provides suitable guidance for the Part 2 LPs without being overly restrictive. For that reason all percentages should be omitted from the policy,

with the same applying to references to the total new housing figures as maximums, whether intended as indicative or not. The first sentence of para 16.19 should be modified to accurately reflect the role of neighbourhood plans in relation to the JCS and the Part 2 LPs (**MMs 56/57**). The modified wording would be consistent with paras 54 and 182 of the NPPF.

165. The fact that it follows an Interim Rural Housing Policy (SLD 18) adopted by one of the constituent Councils of the JPU to address a recent serious shortfall in new housing land supply is not sufficient justification for retaining the use of percentages in this strategic level plan that looks ahead to 2029. Overall, the JPU's evidence, including the SA (J59 + SUB 6) and SHLAA (GLD 47) confirms that the housing requirements of the area can be met, including on various potential sites in the rural areas, without the need for new settlements, in this plan period at least.
166. Policy R2 seeks to sustain and enhance the rural economy, whilst respecting the character and environmental quality of the area. It is positively worded and consistent with the relevant national policies in the NPPF, including para 28. The term "small scale", regarding business and commercial development in relation to farm diversification schemes, is appropriate to ensure that the second part of the policy's objectives is also met and there is simply no need for the policy to encourage or specifically support the conversion of existing buildings in rural areas to residential use. However, para 16.20 requires modification for clarity (**MM 58**).
167. Similarly, policy R3, relating to the transport strategy for the rural areas, seeks better walking, cycling and public transport connections in particular in order to improve accessibility on a sustainable basis. This accords with the NCC Transportation Plan, as well as the NPPF. Both policies also suitably reflect the respective SCSs for the two rural districts, are clearly worded and appear deliverable. They are therefore sound.

### **Issue 17 – Brackley (policies B1 to B4)**

168. The plan's strategy for Brackley in policy B1 involves enhancing its role as a rural service centre in the south of the county, including through various improvements to the town centre, as well as regeneration and renewal of a business district/employment area. The latter relates to a SUE to the east of the town on land bounded by the A43 bypass, with residential development to the south of Turweston Road and employment to the north under policy B2. To the north of the town policy B3 allocates a larger SUE, mainly for new housing, made up of a number of interrelated development sites that together will enable the provision of a new east-west highway link from Halse Road to Northampton Road as part of a comprehensive scheme.
169. The JPU's evidence base relating to Brackley and the adopted SNC Masterplan (January 2013) (SLD 8) both point to the potential of the town to grow, on a planned basis, and policies B1– B4 are designed to help deliver that strategy as part of an overall package over the plan period. Each of the SUEs has strong developer interest, with planning permission having been granted for some important elements of both schemes. This enhances their likely prospects for delivery starting early in the plan period, particularly in the absence of any known material constraints and taking into account that the

localised flood risks can be mitigated through policies B2, B3 and BN7.

170. Given the progress on delivery already made to date, there is no need to further alter the wording of policy B2 for Brackley East beyond proposed modifications MM 52 – 54 to provide greater flexibility, as this might be exploited to introduce non employment uses to the detriment of the plan's strategy in seeking a balanced, mixed use, package of developments over the plan period and to the vitality and viability of the town centre in particular. The policy limit on the percentage of B8 uses on the site is also necessary, given the location of the site, the availability of numerous alternatives and the benefits that a mixed use scheme is likely to deliver for the town as a whole, as part of the overall plan strategy.
171. In relation to Brackley North (also known as Radstone Fields) and policy B3, the allocation of further land to the north of the site within the SUE is simply not necessary at present, in the light of the already challenging rate of new housing delivery being sought for the town, in comparison to previous/recent achievements locally. The site is clearly not sustainably preferable to Brackley East and thus there is no need for any modification to policy B3 in this respect.
172. Should the rate of new housing delivery in Brackley materially exceed that currently expected it would be a matter for a future review of the plan to reconsider alongside other potential opportunities. Similar conclusions apply in relation to land to the west of the town, with added constraints there in respect of flood risks and infrastructure delivery, including highway connections to the A422 and Banbury Road.
173. Policy B4 deals with the relevant transport improvements needed alongside the planned growth of Brackley, including for walking, cycling and bus services, as well as junction works on the A43. These schemes are also intended to help reduce the level of out commuting from the town to other employment centres. They are an important part of the overall strategy in facilitating delivery, as referenced in the WN IDP 2012 Update (GLD 70).
174. In the light of the above, with modifications for clarity and updating, policies B1 to B4 are sound (**MMs 52 – 55**).

### **Issue 18 – Towcester (policies T1 to T5)**

175. Policy T1 sets out the spatial strategy for the historic market town of Towcester, including an A5 relief road to the south to be provided as part of a SUE (Towcester South). This is generally consistent with the vision for the town in the 2011 Towcester Masterplan adopted by SNC (SLD 7). It also includes the regeneration of the town centre, incorporating additional comparison (non-food) retail floorspace, as well as improved facilities. This should bolster its role as a rural service centre that should benefit significantly from the removal of through traffic, including HGVs, once the relief road is open. Accordingly, both strategy and policy are sound.
176. Under policy T2, mixed use redevelopment in the town centre and the adjoining Moat Lane regeneration area is encouraged, in order to enhance the vitality of the former and the town's economy generally, as well as preserving and enhancing important local heritage assets, including the Bury Mount. Again, the proposals are sound in principle.

177. To the south of the town, and in connection with provision of the new east-west relief road from the A5 to the A43, plus improvements to the latter, policy T3 envisages a SUE with a total of around 3,000 new homes, albeit not all are presently expected to be completed during the plan period. The overall scheme is also expected to deliver significant employment land, schools, community facilities including local centres, relevant infrastructure and a new town park, whilst respecting the landscape settings of local heritage assets, including Easton Neston Park and Garden.
178. In this context, it is entirely appropriate that the plan should require the preparation of a comprehensive masterplan for the whole site, amongst other things, albeit individual elements may be delivered separately, if necessary. The absence of phasing restrictions, as such, also means that, subject to viability and the delivery of the relief road, new housing completions may prove to be greater than currently envisaged in the plan's housing trajectory.
179. The JPU's evidence, fully endorsed by the two main developers involved, shows that the scheme is viable and deliverable at current costs/values, without the need for additional areas to be included. Moreover, the basic design and route of the relief road, as proposed in this scheme, is deemed suitable and appropriate by the HA and NCC as the local highway authority, without the need for extension and/or material amendment. An alternative route to incorporate development at Burcote Green would be noticeably longer and thus more expensive and less suitable for some through movements.
180. The latest evidence indicates good progress towards implementation, including a resolution to grant planning permission subject to legal agreements, which are themselves moving towards finalisation between all the relevant parties concerned. The funding that the HA has recently been able to bring forward for necessary works at junctions on the A43, that assists the overall viability of the scheme, reinforces the conclusion that the scheme is deliverable as presently planned. Otherwise, all the available evidence indicates that the necessary infrastructure can be provided at reasonable cost and that the relevant funds are or would be available when required for implementation. There are good prospects of an early start to the delivery of new housing here.
181. In such circumstances, the proposals in policy T3 are sound in principle and there is no need to allocate additional land to enable the SUE overall or the relief road specifically to come forward during the plan period. Nor, given the significant constraints on land to the east of the town, are there any sustainably preferable alternative locations for a SUE to the town at present, as confirmed in the Pre Submission SA (GLD 12), the SA of the Proposed Changes (SUB 6) and the SA Addendum (J57).
182. The proposed SUE is of a sufficient scale to provide an appropriate and realistic percentage of the wider area's overall needs in Towcester over the plan period. This would be commensurate with its present, relatively small, size as a town and strategic role as a rural service centre, without creating an imbalance with other centres, such as Brackley and Daventry. Consequently, irrespective of any individual merits of the site, no further allocation at Burcote Green, or elsewhere, is required in this plan.
183. In fact, any development there could realistically only follow that of the SUE,

due to its location which is essentially unrelated to the existing built up area of the town. Rather than increasing likely delivery in the shorter term, extending the allocation to include this land would probably hinder it, due to the inevitable delays involved in revising the current scheme. Notwithstanding, there is no clear evidence that the development of Towcester South as presently proposed would prejudice any other opportunities around the town to meet possible future needs for growth beyond this plan period.

184. Detailed issues regarding the specific numbers of new homes, including the affordable housing percentages, the specific mix of development on sites within the SUE allocation and the exact boundaries of the new town park are not matters for this plan. Instead, they are development management issues to be resolved through specific schemes in the context of an overall masterplan. This includes in respect of the indicative figures in the plan, relating to potential layouts, as these are not intended to be prescriptive but rather are illustrative in nature.
185. Policy T4 lists the transport improvements necessary to implement the development envisaged in the plan, including the regeneration of the town centre, and is consistent with the outcomes of the Towcester Transport Study (SLD 13). Under policy T5, suitable criteria are laid down for consideration of any proposals for intensification of uses at Towcester Racecourse, on the edge of the town. These both recognise its potential as an important leisure, recreation, and tourism facility as well as ensuring that the heritage assets of the site and their settings are conserved and, where possible, enhanced. Both policies are sound.
186. In the light of all of the above, policies T1 – T5 inclusive relating to Towcester are sound in principle. However, for clarity and to facilitate implementation, it is necessary to delete the second and third sentences of former para 14.18 (new para 14.20), as there is no land use planning justification for seeking to restrict, in policy terms, the amount of new housing in the vicinity of Wood Burcote to the minimum necessary to secure the delivery of the new town park. This should instead be determined in the context of the overall masterplan for the SUE and/or particular proposals that come forward, taking all relevant material considerations into account, including viability and local landscape character. Also, it is now common ground that a new secondary school site is no longer deemed necessary within the SUE (**MMs 49 - 51**).

### **Issue 19 – Daventry (policies D1 to D5)**

187. Under policy D1, the JCS strategy for Daventry is to support the town's growth to a population of around 40,000 by 2040, in accord with an adopted 2012 masterplan prepared by Daventry District Council (DLD 17). This includes the completion of existing developments to the north of the town at Middlemore and Monksmoor for new homes and local employment, as well as provision of the Daventry Development Link A45 corridor improvements to Northampton.
188. The regeneration of the town centre, incorporating retail, office and leisure developments within and adjoining it, as set out in policy D2, is also an important component of the strategy to maintain its vitality and viability and make the town into a more sustainable settlement overall. New public and private investment, such as the iCon centre, is already taking place locally to

assist in this respect. Accordingly, both policies are inherently sound, albeit some modifications to the wording are necessary for clarity and to assist implementation, as well as to acknowledge the latest expectations in relation to delivery (**MM 48**).

189. In order to achieve the level of growth sought, various locations have been examined for SUEs on the periphery of the existing urban area, including full consideration of possible additions/alternatives to the initially selected site as part of the SA work on the proposed modifications. That work and that which preceded it in the long plan preparation process clearly demonstrates that the most sustainable option for a new SUE to Daventry in the plan period is to the north east of the town, on a site known as Church Fields by the promoters.
190. All the relevant evidence points to this site being deliverable in practice, albeit probably not all within the plan period, with the identified constraints and levels of infrastructure required to support its development capable of reasonable resolution and suitable provision on an economically viable basis in terms of current costs/values. In principle, this site should be capable of delivering the new housing, facilities and services, including a new secondary and two primary schools, needed to fulfil the strategy for Daventry over the plan period, without the need for any additions or alternatives to be identified.
191. It is common ground that new housing delivery in Daventry over the recent past has been relatively slow in a fairly weak market, particularly compared to the surrounding rural areas, and that significant investment in transport schemes is necessary to facilitate a material improvement in performance, notably completing the Daventry Development Link, now scheduled for 2019/2020. Notwithstanding, the practical highway capacity exists now for the number of new homes anticipated in the plan. Moreover, the necessary A5/A45 junction works have recently been completed and NCC are actively pursuing delivery of the new road scheme, with other relevant parties, on a recently revised route, and on an innovative funding basis.
192. Taken together with the recently permitted major expansion at DIRFT, roughly 6 miles to the north of the town, providing increased local employment, these transport improvements should increase the comparative attractiveness of Daventry as a location for new house building. This is likely to prove a more effective measure to bolster delivery at relatively higher levels than recently achieved than simply allocating additional and/or alternative sites in less sustainable locations around the town.
193. The location of Daventry North East in respect of potential integration with the town centre and the Southbrook area of the town, across the B4036, is suitable and sustainable. The size of the site also provides an opportunity for new green areas, including for outdoor playing fields, an extension of the country park and on the peripheries to help integrate the new built form into the local landscape hereabouts (the Daventry "bowl") and avoid development on land in flood zones 2 and 3, according to the SFRA.
194. Such a development form should also ensure that the outlying villages of Welton to the north and Norton to the east, as well as Long Buckby beyond, retain their separate identities once the scheme is completed. The smaller sites promoted as alternatives/additions to the SUE, including those to the

north of the town, are not only essentially non-strategic in scale, but also are not capable of providing the number of new homes or the range of new services and facilities that come as part of the overall package with a SUE, and thus offer no particular comparative advantage. Nor are they as well connected to the town centre. Nevertheless, any potential that they may have on their individual merits to contribute to Daventry's housing needs over the plan period or beyond is a matter for the Part 2 plan.

195. There is always a risk in concentrating the majority of new housing in a town over a plan period on one large site but, in this specific instance, that is firmly outweighed by the suitability and sustainability of the selected SUE compared to the other alternatives/additions put forward. This is particularly so in respect of the largest alternative/additional site, known as Danetree, east of the town, as it would extend built form further into the open countryside in a more prominent and sensitive location in landscape terms. It would also be less related to the town centre than Daventry North East, being effectively separated from much of the rest of the town by Borough Hill, and inevitably focus most of the new traffic likely to be generated principally onto the A45 corridor, whereas that from Daventry North East would be more dispersed onto other routes.
196. The conclusion that policy D3 is sound is reinforced by the clear evidence that the Daventry North East site is "ready, willing and able" to be delivered on time by a national house builder, who plans to bring in others, has shown a firm commitment to the site over many years and seems unlikely to walk away now. Consequently, the risk is considerably reduced in Daventry at present, with no persuasive evidence that any alternative site could achieve new housing delivery on a materially relevant scale more quickly.
197. Policy D4 supports community regeneration in Southbrook, including better physical links and social connections with the rest of the town and the proposed SUE. Regarding transport, policy D5 confirms the need for improved connectivity to Northampton along the A45/A4500 corridor by road, as well as by public transport to Long Buckby station, together with improved facilities there. Both policies are realistic as well as aiming to assist the plan's overall sustainability objectives and are therefore sound.

## **Issue 20 – Monitoring and Implementation (policy S6)**

198. In circumstances where the level of new housing completions has fallen well below that expected locally over the last few years, the importance of satisfactory monitoring of the plan and particularly of new housing delivery cannot be overstated. Moreover, the very challenging new housing targets set by the JPU over the plan period will require double digit percentage increases in delivery in future years, with each constituent Council individually responsible for its own 5 year housing land requirement, in accord with the NPPF. Monitoring of employment growth will also be on a locality basis.
199. Nevertheless, in order that flexibility is enhanced, it is considered desirable and acceptable in principle that the NRDA is taken as one joint area for the assessment of new housing delivery. That being so, it is also appropriate in this particular local context that housing land supply should be measured against the housing trajectory, rather than just the simple annualised target.

Otherwise there would be little point in having a trajectory at all.

200. The housing numbers in the plan are not intended to operate as a cap or upper limit, and there are no generalised phasing restrictions on the delivery timing of any of the strategic sites, with Tables 6A and 6B of the plan acting as aids to monitoring only. Accordingly, scope exists for some strategic sites to come forward more quickly than might otherwise be the case in the event of unforeseen problems arising regarding implementation on any particular one, especially around Northampton itself. Whilst permissions on un-allocated sites may have to be part of the response to non-delivery of some strategic sites elsewhere in the area, there is no particular reason or need for this to be specifically referred to in this policy.
201. Regarding implementation, policy S6 acknowledges the importance of achieving key outcomes, consistent with the guidance in para 152 of the NPPF. Together with Appendix 6, it also includes sufficient detail in relation to the monitoring of indicators to ensure that appropriate triggers will apply in the event that planned outcomes are not being secured over time. Overall, the policy is essentially sound. However, in order to be positive, given that there is to be only limited cross border flexibility between Councils as such, other than in the NRDA, it needs to be modified by deleting the word "consider" in all of the bullet points, except in relation to compulsory purchase, so that potential corrective measures are not delayed should they prove necessary, and also by replacing "may" with "will" (MM 9).

#### **Issue 21 – Northampton Norwood Farm/Upton Lodge SUE (policy N9A)**

202. Much of this proposed SUE to the west of the town and north of Weedon Road already constitutes a planning commitment as part of the longstanding South West District scheme for a major urban expansion. It is now considered capable of delivering around 3,500 homes (previously 2,565), as well as the final, northern, section of the Sandy Lane Relief Road, and related services, including two new primary schools and a local centre.
203. Concerns have been expressed regarding increased flood risks on the River Nene to the south, but the SFRA indicates and the EA are satisfied that, with appropriate design and layout, development can proceed without a harmful impact in this respect. Similar conclusions apply in regard to traffic generation, particularly given the new road infrastructure that will be provided with the scheme. Issues of local land stability on steep slopes can also be addressed by detailed design solutions, including through layout and the use of specific construction techniques, where necessary.
204. In relation to Harpole nearby and also landscape/visual impact, an area locally designated as an Important Local Gap and Special Landscape Area would be affected by the scheme. Notwithstanding, this site represents one of the more sustainable alternatives for a SUE on the edge of the town and, assuming traditional built form, the landscape/visual impact of development here would be limited in both scale and extent. In particular, avoiding any new development west of Sandy Lane, so that it forms a firm boundary for the SUE on the edge of the town in this locality, should ensure that Harpole is able to retain its separate identity as a village. Moreover, the visual and landscape impact of development here would be restricted so that no significant harm to

the character and appearance of that settlement, or elsewhere, would arise from this allocation.

205. Although involving the loss of over 20ha of good quality (Grade 3a) agricultural land, plus other greenfield areas, the sustainable location on the edge of the town, good transport links, proximity to employment and the opportunity to create new communities well related to existing housing, as well as the overall need for new homes, mean that the balance of public benefit weighs heavily in favour of development here. Subject to the restriction of new built development to the east of Sandy Lane, with all the land to the west that is included in the allocation to form part of a structural greenspace associated with the SUE, as proposed, I am satisfied that this scheme should proceed and the site should be allocated in the plan (**MM 46**).

## Assessment of Legal Compliance

206. My examination of the compliance of the plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Joint Core Strategy is identified within the approved LDS (June 2012) (SUB 12), which sets out an expected adoption date of October 2013. The need for main modifications has meant a delay to the process, but otherwise the plan's content and timing are compliant with it.
Statement of Community Involvement (SCI) and relevant regulations	The Statements of community Involvements for Daventry, Northampton and South Northamptonshire were all adopted in 2006 (SUB 20, SUB 21 and SUB 22). Consultation has been compliant with the requirements therein, including on the post submission main modifications (MM).
Sustainability Appraisal (SA)	SA has been carried out throughout the plan process, including in relation to the post submission main modifications (MM), and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Report (February 2011) (GLD 14) with Addendums (July 2012) (SUB 09) (December 2013) (J57) has been undertaken and is satisfactory.
National Policy	The Joint Core Strategy complies with national policy, except where indicated and main modifications are recommended.
Public Sector Equality Duty	The JCS complies with the Duty and is adequate.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS for each of the Councils.
2004 Act (as amended) and 2012 Regulations.	The Joint Core Strategy complies with the Act and the Regulations.

## **Overall Conclusion and Recommendation**

**207. The plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.**

**208. The Councils have requested that I recommend main modifications to make the plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the West Northamptonshire Joint Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

*Nigel Payne*

Inspector

This report is accompanied by the Appendix containing the Main Modifications