



West Northamptonshire Joint Strategic Planning Committee

Your attendance is requested at a meeting to be held at Towcester on
Tuesday, 20 October 2009 at 6:00 pm.

D. Kennedy
Chief Executive

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Agenda

1. APOLOGIES FOR ABSENCE
2. MINUTES OF THE MEETING HELD ON 4 AUGUST 2009
(attached)
3. DECLARATIONS OF INTEREST
 - Personal
 - Prejudicial
4. MATTERS OF URGENCY
To consider any issues that the Chairman is of the opinion are
Matters of Urgency.
5. REVIEW OF THE LOCAL DEVELOPMENT SCHEME
(attached)
6. RESPONSE TO THE CONSULTATION ON THE PARTIAL
REVIEW OF THE REGIONAL SPATIAL STRATEGY FOR THE
EAST MIDLANDS
(attached)
7. THE CHAIRMAN TO MOVE:
"THAT THE PUBLIC BE EXCLUDED FROM THE REMAINDER
OF THE MEETING ON THE GROUNDS THAT THERE IS
LIKELY TO BE DISCLOSURE TO THEM OF SUCH
CATEGORIES OF EXEMPT INFORMATION AS DEFINED BY
SECTION 100(1) OF THE LOCAL GOVERNMENT ACT 1972 AS
ARE LISTED AGAINST SUCH ITEM OR ITEMS OF BUSINESS
BY REFERENCE TO THE APPROPRIATE PARAGRAPH OF
SCHEDULE 12A TO SUCH ACT."

Agenda Item 2

WEST NORTHAMPTONSHIRE JOINT STRATEGIC PLANNING COMMITTEE

Tuesday, 4 August 2009

PRESENT: Councillor Tony Woods (Chair), Councillors Brian Markham, Chris Over (substitute), Ken Melling, Richard Church, Dennis Meredith (substitute), Chris Long (substitute), Wendy Amos, Keith Davies, Robin Brown, Roy Pulling, Stephen Clarke, Andre Gonzales de Savage, Mr David Dickinson

1. APOLOGIES FOR ABSENCE

Apologies had been received from Councillors Barnes, Bass, Garlick (substituted by Cllr Meredith), Millar and Townsend.

2. MINUTES OF THE MEETING HELD ON 6 JULY 2009

These were agreed as a true record and signed by the Chair subject to the following amendments:

- Page 1, Item 1, paragraph following the resolution, line 6/7: to read
“... as the delivery vehicle that would be making some of the development control decisions...”
- Page 2, Item 5: add to Declarations of Interest:
 - Councillor Brown, personal, non-prejudicial interest as member of EMRA
 - Councillor Church, personal, non-prejudicial interest as member of WNDC Board
- Page 3, Item 7, paragraph 2, line 7: to read
“... happen with out commuting and increased traffic.”

3. DECLARATIONS OF INTEREST

1. Councillor Chris Over declared a personal, non-prejudicial interest as a member of the ICON Board.
2. Councillor Meredith declared a personal, non-prejudicial interest as a member of NBC Planning Committee and substitute member of the WNDC Northampton Area Planning Committee.
3. Councillor Andre Gonzales de Savage declared a personal, non-prejudicial interest as Chair of Wootton and East Hunsbury Parish Council.
4. Councillor Wendy Amos declared a personal, non-prejudicial interest as a member of WNDC Planning Committee for Daventry.
5. Councillor Robin Brown declared a personal, non-prejudicial interest as a member of EMRA.
6. Mr David Dickinson declared a personal, non-prejudicial interest as a member of WNDC Board, a director of Amicus Horizon Housing Association and a former director of the Guinness Trust.
7. Councillor Brian Markham declared a personal, non-prejudicial interest as Chair of NBC Planning Committee.
8. Councillor Richard Church declared a personal, non-prejudicial interest as a member of WNDC Board and the WNDC Planning Committee for Daventry.
9. Councillor Stephen Clarke declared a personal, non-prejudicial interest as a member of

EMRA.

10. Councillor Tony Woods declared a personal, non-prejudicial interest as a member of WNDC Board, member of WNDC Planning Committees for Daventry and Towcester and a member of EMRA.

4. MATTERS OF URGENCY

There were none.

5. CONSULTATION ON REGULATION 25

The Interim Head of the West Northamptonshire Joint Planning Unit presented the report to the Committee, outlining the responses received to Regulation 25 Consultation for the Joint Core Strategy carried out between Thursday 8 January and Thursday 5 March 2009. She drew attention to paragraph 4.2 of the report, which set out a summary of the number of responses received by theme. It was noted that there had been no surprises in the content of the responses, The Interim Head pointed out that of the 53 responses, 30% had related to the Allocations and the Promotion of Land, with substantial comment on the themes of Employment & Economy, Environmental Infrastructure & Biodiversity, Infrastructure and Transport. All responses had been logged and a full list was available on request.

The Interim Head commented that under Regulation 25, there was an ongoing requirement for consultation throughout the plan-making process. As part of the wider remit of Regulation 25, the JPU was engaging in another period of consultation on the Emergent Core Strategy. The responses to the Emergent Joint Core Strategy would be reported back to the Committee in due course.

Councillor Amos, backed by Councillor Woods, commented that infrastructure was a concern to all.

RESOLVED

That the responses received be noted.

6. CONSULTATION ON AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

The Interim Head of the West Northamptonshire Joint Planning Unit presented the report to the Committee explaining that the purpose of the Supplementary Planning Document (SPD) was to provide interim supplementary guidance for the Daventry District, Northampton Borough and South Northamptonshire Councils. The Committee was asked to note the responses received as set out in paragraphs 4.1 to 4.11 and to support the next steps as outlined in paragraphs 5.1 to 5.3 of the report.

The Interim Head commented that consultation had taken place between 9 April and 26 May 2009 and had been publicised in the press, with details also on the website and over 2000 notification letters and e-mails had been sent out. In summarising the responses, the Interim Head drew particular attention to concern about the threshold for affordable homes in rural areas and this had highlighted a need for flexibility about the viability of affordable homes, especially given the current market conditions.

Councillor Church commented that there appeared to be a contradiction in paragraph 4.6 of the report where it stated that affordable housing be kept to a minimum in rural areas and yet affordable housing was seen as beneficial for local populations. Councillor Stephen Clarke expressed the importance of meeting local needs in this respect.

Councillor Ken Melling questioned the term 'tenure blind design' in paragraph 4.9 and it was pointed out that this was when developments were designed in such a way that affordable

housing was not easily distinguishable within a development.

Councillor Wendy Amos expressed concern at the delay on progressing the SPD but was reassured that the SPD was an interim document pending the adoption of the Affordable Housing and Developer Contributions DPD and that delaying until the end of August would ensure that up to date evidence was included. No penalty would be incurred for the delay.

Mr David Dickinson confirmed that tenure blind design did not imply that all developments would look the same, but that affordable housing would not be identifiable within a development. In response to a query from Councillor Robin Brown, Mr Dickinson commented that both tenure blind design and pepper potting were needed. Mr Dickinson commented that, with the first annual review in December 2009 of the Tenants Services Authority, which had been set up in December 2008, he felt that there were good practical reasons for the delay in completing the SPD so that changes could be made as a result of the consultation.

Councillor Chris Over expressed concern about the sustainability of affordable homes, given residents' right to buy and potential transformation of affordable homes to unaffordable properties. It was pointed out that there was little that could be done about this unless properties were reserved for older people. The same issue would arise at the completion of purchase of homes that were currently shared ownership. Councillor Andre Gonzales de Savage stressed the importance of building in a percentage of affordable and other homes for older people. It was pointed out that there was currently liaison with the County Council on this issue, although it was felt that a large proportion of the elderly wanted to remain in their own homes. However, a good mix of property types was important, as was consideration of the needs of local population.

RESOLVED

That the responses received be noted and the 'Next Steps' outlined in the report be supported.

7. UPDATE ON RECRUITMENT

The Interim Head of the West Northamptonshire Joint Planning Unit reported on the progress of recruitment to the Unit. Claire Berry had been appointed as the Team Leader, with David Hemmett appointed as Information and Programme Manager; Principal Officers were John Deakin and Val Coleby, supported by Senior Officers, Troy Hayes and Josie Batemen. Jon Goodall had been appointed as Monitoring Officer. There were also two seconded Planning Officers, Ellie Gingell and Wendy Cooper. Advertisements were in progress for two administrative assistants, a technician and for a third Principal Officer. The post of permanent Head of the JPU had still not been filled and Karen Moore had agreed to remain as Interim Head until December, with support from a temporary assistant.

RESOLVED

That the report be noted.

8. UPDATE ON CONSULTATION FOR THE EMERGENT JOINT CORE STRATEGY

The Interim Head of the Joint Planning Unit gave an update on the consultation for the Emergent Joint Core Strategy. She informed the Committee that there were extra copies of the Emergent Joint Core Strategy document and questionnaires available for members to take away at the meeting.

The Interim Head explained that over 2000 letters and e-mails had been sent to everyone on the JPU consultation database including to all County, Borough and District Councillors in West Northamptonshire, MPs and MEPs, libraries (including mobile libraries), adjoining

libraries, community centres, Council receptions, Local Strategic Partnerships, all Town and Parishes Councils in West Northamptonshire and adjoining, residents associations, community groups, business interests, landowners, developers, government agencies, statutory bodies, service providers, local government and private individuals. Over 800 Emergent Joint Core Strategy documents and questionnaires had been posted out. The Interim Head commented that the information provided had triggered a steady flow of telephone queries. A specific call line had been established to record calls enabling these to be analysed as part of the consultation.

It was also explained that all the information was also available via the Councils' websites with links provided to the JPU website.

A series of public exhibitions had been arranged over 36 days at 18 different venues. A leaflet had been prepared to provide information about the exhibitions and the local media would be continuously advertising the events. Seminars would be held to discuss the technical aspects of the Emergent Joint Core Strategy with the housing industry, the commercial sector and service providers.

Councillor Dennis Meredith commented that it was good that the consultation information had been sent to so many stakeholders. He was concerned that he had tried to leave a response on the website and had found it confusing. He suggested that it was made easier to leave a response on the website.

The Committee debated holding more exhibitions. The Interim Head of the JPU explained that it was more efficient to concentrate exhibitions on the main towns, in accessible and highly populated areas with one or two locations in each area highlighted for possible development as there were not enough resources for every area to be covered. It was agreed that the JPU would consider requests for the exhibition display boards to be made available to local communities on an unstaffed basis.

Councillor Brian Markham enquired about colleges and universities being consulted. The Interim Head of the JPU explained that education establishments were already included in the consultation.

Councillor Andre Gonzales de Savage suggested that consultation events be offered in supermarkets to allow the process to be more widely accessible. He offered his services in supporting any additional exhibitions and the Interim Head of the JPU welcomed this and potential offers of future help from other members.

High profile exhibitions were currently planned for Northampton Market Square (in conjunction with the Central Area Action Plan team) as well as in Daventry, Brackley and Towcester and in Weston Favell Shopping Centre.

Councillor Stephen Clarke requested that a clearer version of the emerging strategy be produced and suggested that a further briefing note be produced. He was concerned about the slippage caused by the delay in starting the consultation period and the impact on the LDS. He was concerned that the timetable and scheduled meetings were not going to meet the needs of the proposed deadlines. The Interim Head of the JPU informed Members that she was going to consider the timetable/programme and that there was no longer a penalty for missing deadlines. Councillor Clarke felt that there was a need for Members of the Committee to be fully engaged with the strategy as well as being fully briefed on the outcome and impact of the consultation. He also felt that it was essential to understand all of the options that may arise from the consultation. The document had to be fit for purpose with any checklist making clear that the Joint Core Strategy was emergent. He called for Members of the Committee to be fully briefed on the JCS and requested a timescale for this.

He also felt that the infrastructure for growth needed to be understood and that evidence was needed to support proposals.

The Interim Head of the JPU assured the Committee that the matters raised by Councillor Clarke had or were being dealt with as part of the process. It was suggested that Councillor Clarke and the Interim Head of JPU meet to discuss the matters raised.

RESOLVED

That the report be noted.

The meeting concluded at 19:01

Item No: 5
Date: 20 October 2009

**WEST NORTHAMPTONSHIRE
JOINT LOCAL DEVELOPMENT FRAMEWORK
JOINT STRATEGIC PLANNING COMMITTEE**

REPORT OF THE INTERIM HEAD OF THE JOINT PLANNING UNIT
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Review of the Local Development Scheme for West Northamptonshire

Background

- 1.0 The Joint Local Development Scheme sets down the documents that will form the Local Development Framework for West Northamptonshire and the programme to which they will be produced. The purpose of this report is to seek the agreement of the committee to review the Joint Local Development Scheme for West Northamptonshire following an invitation by Government Office East Midlands to do so. The relevant letter is attached at Appendix A.
- 2.0 The current Local Development Scheme was approved by Members of the Joint Strategic Planning Committee in November 2008. Since that time a number of key matters that affect the original programme have become apparent and publication of a pre submission document is no longer possible in November 2009.
- 3.0 The Government Office for the East Midlands recognises the significant progress made by the Joint Planning Unit and the Joint Strategic Planning Committee in publishing the Emergent Joint Core Strategy and the on going efforts being made to progress to pre submission. However, the complex infrastructure issues that need to be better understood and resolved before pre submission, their complexity, sensitivity and financial impact all require further time and this is recognised by Government Office – hence the invitation to review the Local Development Scheme.

Recommendation

- 3.1 That the Joint Strategic Planning Committee agrees to the review of the Local Development Scheme in principle.
- 3.2 That discussions with Government Office East Midlands include the separation of the Affordable Housing and Developer Contributions Development Plan Documents.

- 3.3 That work on the Affordable Housing Supplementary Planning Document is abandoned for legal reasons.
- 3.4 That a revised Local Development Scheme is brought before the Joint Strategic Planning Committee in December once the critical paths for outstanding evidence and policy making have been mapped and a common understanding with key agencies on a way forward is reached.

Evidence base

- 4.0 There are some fundamental pieces of high risk technical evidence, principally transport modelling, flood risk assessment and water cycle strategy (foul water capacity) that are still awaited. These critical issues have now been exposed more fully through the publication of the Emergent Joint Core Strategy requiring the key agencies to rigorously test and evidence the capacity (or otherwise) of existing infrastructure to accommodate the scale of growth within the timescales required by the Regional Spatial Strategy.
- 5.0 The results of these studies have the potential to have a material impact on the proposals in the Emergent Joint Core Strategy and the shape of the pre-submission plan. The preliminary outputs from the transport modelling are of particular concern requiring further time for all involved to consider fully the evidence from these base studies and assess the capacity of West Northamptonshire and, in particular, the Northampton Implementation Area to accommodate growth properly. The risks related to delivery are heightened for West Northamptonshire, given the absence of any regional infrastructure programme of investment for increasing transport capacity.
- 6.0 The potential weakness of infrastructure deficit, and limited testing of infrastructure capacity through the regional planning process, was identified in the Emergent Joint Core Strategy. A strategic principle of the Emergent Joint Core Strategy is to align necessary new infrastructure to enabling development, so as to develop an infrastructure platform for the future, a funding mechanism to facilitate delivery in the absence of adequate public funding, and a long term “plan” that would support future bids for public investment. Without such a ‘plan’ West Northamptonshire is at high risk of missing out again as and when infrastructure funding becomes available. This strategic principle, in part, may now be compromised by the inadequacy of existing infrastructure and the uncertainty created by the unknown outcomes of the Delivering a Sustainable Transport System (DaSTS) study and the Regional Spatial Strategy review.

Consultation on the Emergent Joint Core Strategy

- 7.0 The recent consultation on the Emergent Joint Core Strategy proved to be a very effective consultation process eliciting in the region of 6,000 individual responses most of which raise a number of proper issues that will be given careful consideration.
- 8.0 Each response will be acknowledged, details logged, responses logged into the computer system and then officers will analyse and consider how each matter could be responded to within the next stages of plan making. At this moment it

is only possible to estimate the time it will take for the team to analyse and consider responses to the representations made. However it is estimated that this could be completed shortly before Christmas 2009.

9.0 There is no requirement within the regulations to respond directly to individuals but a detailed report will be produced for the JSPC that will note how the matters raised have been accounted for in plan making. When the final plan is submitted for examination this report must accompany the plan as evidence for the Planning Inspector to consider.

10.0 The responses from statutory agencies such as the Highways Agency, Environment Agency and Natural England will be the subject of a report to Joint Strategic Planning Committee in November 2009.

Risks of a new timetable

11.0 A number of risks present themselves with respect to a change in the programme. The key risks are outlined below:

- There is a significant risk that land owners and developers of potential sites will choose not to wait for the pre submission Joint Core Strategy for West Northamptonshire and instead seek to make applications and if refused planning permission seek redress through the appeals process. This is a lengthy and expensive process for all parties and it is hoped that the development industry would prefer to work within the certainty of an agreed policy framework.
- The resources required to undertake production of the Local Development Scheme will need to be made available and the resource position considered beyond the original three years of the first Joint Local Development Scheme agreed by Committee in December 2008. The Joint Strategic Planning Committee will receive a further budget report later in the financial year.
- The demand on councillors time of the intensive programme of working sessions and briefings requested will impact significantly upon member's diaries. There is a serious risk when members are unable to attend such working sessions that understanding of the work does not develop evenly across the committee. Officers will give as much notice as possible for the programme of member engagement.

11.1 It is considered, however, that these risks are unavoidable.

Affordable Housing and Developer Contributions Development Plan Document

12.0 Consultation on a draft Affordable Housing Supplementary Planning Document (which is only able to expand on existing policy not set new policy) is now complete. Consultation on the Developer Contribution Development Plan Document has commenced. However, a number of issues have recently come to light, which collectively suggest an alternative approach is needed.

- 13.0 The Community Infrastructure Levy is intended as a mechanism to extract development contributions for infrastructure but is not intended to meet the full bill for such infrastructure. The draft guidance and regulations for Community Infrastructure Levy, published by Government at the end of last month, suggest that it will almost certainly be necessary to introduce a Community Infrastructure Levy charging schedule as a key strand for the collection of developer contributions in West Northamptonshire. The final regulations will not be issued until 6th April 2010. Given the importance of the final regulations, it would be prudent to wait until after this date to complete a draft of the Developer Contributions Development Plan Document.
- 14.0 The consultation responses to the Affordable Housing Supplementary Planning Document raised two key concerns. The first is why an Affordable Housing Supplementary Planning Document is required, when a Development Plan Document on the same topic is already under preparation. Members will recall that there was a strong desire to put an interim statement in place with respect to Affordable Housing. However, the second, more fundamental issue is that the scope of the Supplementary Planning Document goes beyond what is possible for such a document and does indeed seek to make policy. Legal advice has been sought, which validates this concern:
- 'Sections 5 and 6 of the draft Supplementary Planning Document contain policy which should be within a Development Plan Document. These sections go beyond providing greater detail to proscribe inter alia thresholds and tenure.'*
- 15.0 It is therefore proposed that the Affordable Housing Supplementary Planning Document is abandoned. Work will continue to analyse the consultation responses to make sure that the issues raised are reflected in future work. In the interim the Regional Spatial Strategy and Saved Local Plan policies should continue to be used to require affordable housing.
- 16.0 It is also proposed that the Affordable Housing and Developer Contributions Development Plan Document is split into two single topic Development Plan Documents. The Affordable Housing Development Plan Document would be prepared to the same timetable as for the Core Strategy. This proposition will need to be subject to detailed discussion with Government Office.

KJM 12/10/09



GOVERNMENT OFFICE
FOR THE EAST MIDLANDS

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Date: 15 September 2009

Dear David

West Northamptonshire Joint Core Strategy

Further to our meeting on 3 September 2009 to discuss the above, we recognise the significant progress that has been made by the Joint Planning Unit and Joint Strategic Planning Committee in publishing the Emergent Joint Core Strategy and the ongoing efforts that are being made to progress to a pre-submission draft. However, as we discussed at our recent meeting, we recognise that there are complex infrastructural issues that need to be better understood and reasonably resolved before pre-submission. We understand that the complexity, sensitivity and financial impact of these issues has led to key agencies and partner authorities needing more time to conclude essential evidence base studies, consider the results, assess delivery, and to agree a common way forward. These studies include the Strategic Flood Risk Assessment, Water Cycle Study and Highways Modelling, It is imperative that a sound evidence base is in place to support the pre submission document and the scale of growth that can be accommodated.

We consider that in these special circumstances, the partner authorities should reconsider the timetable for the Joint Core Strategy and other DPDs. We invite you to submit an amended Local Development Scheme for West Northamptonshire to us once you have mapped out the critical paths for the outstanding evidence base studies and have a common understanding with the key agencies of a way forward. We are happy to comment on a draft once you have considered what adjustments you need to make.

Yours sincerely,

Fiona Forgham
Head of Planning



INVESTOR IN PEOPLE

Agenda Item 6

Item No: 6
Date: 20 October 2009

WEST NORTHAMPTONSHIRE JOINT STRATEGIC PLANNING COMMITTEE

Response to consultation – Partial Review of the East Midlands Regional Plan

REPORT OF THE INTERIM HEAD OF THE JOINT PLANNING UNIT

Background

- 1.0 The purpose of this report is to advise members of the recent consultation on the Partial Review of the East Midlands Regional Plan. The Partial Review looks forward to 2031 and focuses on housing, transport and climate change.
- 1.1 The report sets out a proposed response to each of the questions posed through the Partial Review consultation document.
- 1.2 The proposed response suggested to the East Midlands Regional Assembly is to be considered to be from the West Northamptonshire Joint Planning Committee. However, it should also be noted that each partner authority (Daventry District Council, South Northamptonshire Council, Northampton Borough Council and Northamptonshire County Council) already has or will be submitting their own responses to the Partial Review consultation and making their own views and emphasis on consultation questions to the East Midlands Regional Assembly.

Introduction to the Report

- 1.3 In October 2008 the Regional Assembly consulted on the project plan for the Partial Review and proposals for public consultation, as well as the Draft Sustainability Appraisal Scoping Report and a Habitats Regulation Assessment Pre-Screening Report.
- 1.4 The West Northamptonshire Joint Strategic Planning Committee submitted a response to that consultation which is attached as Appendix 1.
- 1.5 The consultation closed on 12 December 2008 and 112 representations were received. As a result of the comments made the Assembly agreed the following key changes to the Project Plan:-

- To focus on the post 2021 period in relation to new housing provision in order that the Region can plan for economic recovery and longer term housing growth with minimal impact on Local Development Framework preparation.
- To amend the consultation timetable to comply with publicity rules surrounding local elections that were delayed until June 2009 but with the target date of March 2010 for submission of the Draft Revised Regional Plan for public consultation remaining unchanged.

The Partial Review

Overview

1.6 The Partial Review of the RSS looks at a number of issues including:

- An assessment of the latest national household projections and advice on affordability (2006 to 2031)
- Alternative approaches to setting affordable housing targets by HMA (2021 to 2031)
- Options for future development in 10 of the Region's 11 Housing Market Areas (2021 to 2031)
- An approach to reviewing Milton Keynes and South Midlands (MKSM) 'Part A' Policies (2006 to 2031)
- Emerging Regional Transport Objectives (2006 to 2031)
- Renewable energy generation and HMA based carbon reduction targets (2006 to 2031)
- An approach to the apportionment of aggregates extraction between county areas (2016 to 2021)

1.7 The East Midlands Regional Plan Partial Review has now reached the Options consultation stage.

1.8 The Options consultation asks 23 specific questions under the following headings:

- Housing
- Spatial Development Options
- Derby HMA
- Leicester and Leicestershire HMA
- Nottingham Core HMA
- Northern HMA
- Nottingham Outer HMA
- Peak, Dales and Park HMA
- Milton Keynes and South Midlands Sub-Region
- North Northamptonshire HMA
- West Northamptonshire HMA
- Central Lincolnshire HMA
- Lincolnshire Coastal Study Area
- Peterborough Partial HMA
- Transport
- Renewable and Low Carbon Energy Generation
- Aggregates

- Implementation

1.9 The following report considers individual responses under these headings but it is proposed that to set the overall concerns of the JSPC in context, individual questions responses are preceded by the following general response.

General Overview Proposed response - *The West Northamptonshire Strategic Planning Committee welcomes the opportunity to comment on the Partial Review of the East Midlands Regional Plan.*

West Northamptonshire has a significant growth agenda which it is addressing and planning for, together with its partner authorities and stakeholders, through the emerging West Northamptonshire Joint Core Strategy. In setting this existing growth agenda it was advised that there were no 'show-stoppers' to the delivery of this growth for the West Northamptonshire area i.e. that the necessary infrastructure, such as highway improvements, would support the growth agenda and that environmental considerations could be overcome. However, the evidence base to support the West Northamptonshire growth provision is demonstrating that there are specific and technical challenges ahead related to the scale of growth that is required to be accommodated.

In seeking to deliver the existing growth agenda through the development of the West Northamptonshire Joint Core Strategy the experience of the Joint Planning Unit and its partner authorities is that funding for infrastructure, in particular highways improvements, is at best uncertain and without the delivery of this necessary infrastructure the growth agenda cannot be delivered. In addition, environmental constraints such as those identified by the Environment Agency on flooding and biodiversity are similarly proving challenging to the delivery of growth. There are concerns that these fundamental aspects were insufficiently addressed through the existing East Midlands Regional Plan.

Consequently the Joint Strategic Planning Committee is anxious to ensure at the Partial Review stage there is an appropriate evidence base to support the review and that assessments of required infrastructure, environmental capacity and especially funding requirements are fully addressed in setting any housing targets. The JSPC is eager to ensure it is not left in a situation of seeking to deliver a housing growth agenda which is not sufficiently supported nor appropriately and fully linked in to funding streams.

The Partial Review focuses essentially on projecting forward housing numbers. However, it is a strong concern of the Joint Strategic Planning Committee that such an assessment cannot be divorced from issues of economic recovery and a planned national agenda for this. There is a belief that the present recession, being structural and deep seated in nature, will require time to fully recover and growth in jobs likewise will be slow. A significant housing growth agenda unsupported by employment opportunities and the necessary social, community and physical infrastructure will not benefit the existing or in-coming community and will fail to achieve sustainable growth to the detriment of the local and wider area.

Housing

- 1.10 The current East Midlands Regional Plan (published March 2009) provides for some 21,500 new homes per year to 2026, distributed across the region by Housing Market Area.
- 1.11 The Partial Review Options consultation comments that the official statistics and advice indicate that there will be a significant growth in the number of people needing housing over the longer term.
- 1.12 The 2006 Based Household Projections were issued by Government in March 2009 and indicate that the East Midlands will be the fastest growing Region in England and will need to plan for some 28,000 new homes per year. Predictions indicate that in West Northamptonshire household growth will be higher than the regional average and higher than all other sub regions. This is a feature of declining household size (mainly due to an ageing population) and population growth. Population growth in the East Midlands will be the result of a combination of natural change (more births than deaths) and in-migration. Natural change is expected to provide for a third of future population growth in the East Midlands. Of the rest around half will be due to net-in migration from other parts of the UK (particularly London and the wider south-east) and half due to net in-migration from beyond the UK including Europe.
- 1.13 EMPR Housing Provision Question 1 – Is there additional evidence on demographic and migration issues that you would like to Regional Assembly to consider as part of the Partial Review?

Proposed Response – The Regional Assembly has commissioned further analysis of household projections including the impact of migration and different migration scenarios. The West Northamptonshire Joint Strategic Planning Committee welcomes the further analysis as in-migration from both UK and overseas sources has significant implications for the region's housing and population growth. Given the severity of the economic downturn the extent of overseas and UK in-migration must be questioned even in the longer term view and the eventual recovery of the economic climate. There is no time frame given in the Options consultation document for this further analysis to be delivered, however the WNJSPC considers that this work must be completed before the housing provision is finalised. To allocate overall housing numbers and any distribution across the region would simply be premature (and risk a legal challenge to the RSS) if basic research is not undertaken on a robust basis.

- 1.14 EMPR Housing Provision Question 2 – Is there evidence on affordability issues that you would like the Regional Assembly to consider as part of the Partial Review?

Proposed Response – The West Northamptonshire Joint Planning Unit (WNJPU) has commissioned an updated Strategic Housing Market Assessment for West Northamptonshire and an affordable housing viability assessment. Both of these studies are close to completion. The JPU will forward the studies to the Regional Assembly and would request that they are considered as part of the Partial Review.

- 1.15 Housing Provision Question 3 – Is there any other evidence on housing issues that you would like the Regional Assembly to consider as part of the Partial Review?

Proposed Response - In general the housing issues in the Partial Review appear unnaturally divorced from issues of necessary infrastructure provision and its funding and employment growth. In addition there appears to be little assessment of the capacity of areas to grow (or not to grow) within any environmental restrictions. The Partial Review is missing key elements of evidence base including infrastructure assessments and further housing analysis commissioned. Some clarity within the document that the capacity of existing settlements to accommodate further growth has been assessed should be an essential element of the Partial Review.

As regards the West Northamptonshire HMA and anticipated growth set out to 2026 there are clearly already issues regarding infrastructure provision and delivery as anticipated through continuing work on the West Northamptonshire Joint Core Strategy. The development industry is shown to be unlikely to be able to fund the infrastructure requirements of the existing planned growth to 2026 and without infrastructure provision growth cannot be delivered. The difficulties of infrastructure provision are already manifest in the present growth agenda. The Partial Review considers the housing figures for 2021 to 2031 implying an increase in the present 2021 to 2026 house building rate by a further 6,500 (a further 32,500 homes across the region for the period 2021 – 2026 giving a total of 140,000 homes across the region for the period 2021 – 2026). The need for infrastructure provision and commitment to funding must be a priority agenda item if an increase in house building rates is envisaged.

Meeting Community Housing Needs

- 1.16 National Planning Policy Statement 3 requires Regional Spatial Strategies to set out a regional approach to addressing affordable housing needs including a housing target for the region and individual housing market areas.
- 1.17 The Fordham Research on possible options for affordable housing targets for the Partial Review commissioned by the EMRA concluded:-
- Regional affordable housing delivery to date has met only half of the 20 year annual average policy target.
 - Affordable housing is funded by 50% public money and 50% private funding via Section 106 agreements
 - Current economic conditions are likely to reduce to reduce the provision of new affordable homes
 - The need for affordable homes is higher than existing targets so future targets must also address an existing shortfall.
- 1.18 The Partial Review will focus on the post 2021 period in relation to new housing provision. For affordable housing three options are identified for developing post 2021 targets for affordable housing:-

- Option 1 – Extend Current Approach: Retain the current indicative targets for affordable housing for 2006-2021 from the adopted Regional Plan for monitoring purposes. Then for 2021-31 commission updated indicative targets for monitoring purposes, consistent with the current Regional Plan.
- Option 2 – Apply a Needs Based Approach for period 2021-31: retain the current indicative targets for 2006-2021 from the adopted Regional Plan for monitoring purposes. Then for 2021-31 apply a needs based model to set targets. This could measure the affordable housing requirement per 1,000 households to determine targets.
- Option 3 – Evidence Based Approach: retain the current indicative targets for 2006-2021 from the adopted Regional Plan for monitoring purposes. Then, revise policy to enable local planning authorities to develop shorter-term targets in line with the conclusions of the most up to date Housing Market Area Assessments, other relevant economic assessments and viability studies for their areas.

1.19 Meeting Community Housing Needs Question 1 – Which of the three main options outlined above should be used as the basis for setting targets for affordable housing provision for the period 2021-31 and why?

Proposed Response - Option 3 as presented in the Partial Review would appear to be the more constructive way forward, and allows local planning authorities the flexibility to develop their own standards based on up to date evidence of local needs and deliverability. Shorter term targets can allow local authorities to respond more rapidly to changing market conditions and viability testing with a potentially greater reliability of market delivery.

1.20 Meeting Community Housing Needs Question 2 – What additional actions could the Regional Plan include to help maximise affordable housing delivery, particularly in smaller settlements in rural areas?

Proposed Response - The Regional Plan as part of its growth setting agenda needs to fully reflect the requirement of infrastructure led growth. Present and foreseeable market conditions will mean a much more limited developer contribution to infrastructure delivery and consequently choices will have to be made in some cases about the level of affordable housing provision that is viable for a site to provide. Whilst the present market conditions will hopefully improve in the longer term there are likely to be continued fluctuations in the market and the levels of economic growth achieved in the early 2000s are unlikely to be realised. Hence it must be accepted that the levels of infrastructure required to support the extent of growth envisaged cannot be overly reliant on the development industry to supply. The danger of so doing will result in further shortfalls of affordable housing delivery. The Regional Plan therefore needs to have a clear evidence base of the likely cost of infrastructure, including affordable housing, required to deliver its growth and regeneration objectives, together with an appreciation of the extent to which the private sector can contribute towards its delivery. It needs to be clear about the public sector investment required and where there are difficult choices to be made give guidance on the extent to which affordable housing delivery has to be prioritised in relation to other infrastructure requirements.

The policy basis for exceptions sites in rural areas is well provided for and is appropriately local needs led. The issue is one of funding and delivery in difficult economic circumstances.

- 1.21 Meeting Community Housing Needs Question 3 – Should the Regional Plan provide guidance on the provision of specialist housing for older people, and if so what form should this take?

Proposed Response - The Regional Plan should respond to this demographic change and provide guidance on how local authorities could respond to the needs for housing an ageing population. At present this area of housing provision is under-represented in a policy context yet is set to potentially be a significant area of housing need. As with planning for affordable housing, the approach should be evidence based drawing on strategic housing market assessments and any other local approaches to housing for older people particularly in the context of partnership strategies for older people.

Spatial Development Options

- 1.22 The Partial Review sets out a range of potential spatial development options for 10 of the housing market areas which are based on the outcomes of a series of informal stakeholder workshops. These are:

- Continue with the current strategic approach based on urban concentration and regeneration with sustainable urban extensions focussed on Principal Urban Areas (including Northampton), Growth Towns and some Sub-Regional Centres (including Daventry);
- Focus development at certain Sub-Regional Centres, Growth Towns and Growth Points, with more of a regeneration focus at the Principal Urban Areas;
- Focus development at public transport nodes;
- Promote a more dispersed development pattern across existing towns and villages;
- Promote a far greater concentration of growth at the largest towns and cities; and
- Promote one or more free standing settlements.

Milton Keynes and South Midlands Growth Area Overview

- 1.23 The Partial Review recognises that both the North Northamptonshire HMA and the West Northamptonshire Housing Market Area also form part of the Milton Keynes and South Midlands (MKSM) Sub-Region which also covers parts of the East of England and South East Regions. Consequently decisions about the future scale and distribution of growth in Northamptonshire have to be made within the context of wider MKSM policy. The three regional planning bodies (the East Midlands, South East of England and East of England Regional Assemblies) have agreed to jointly review the policies that apply to the whole of the MKSM growth area – known as the “Part A” Statement up to 2031. In taking this work forward, the three regional planning bodies propose to:

- Only focus on those elements that require an inter-regional dimension;
- allow sufficient flexibility for each region to take forward detailed policies and proposals as appropriate according to their own review timescales; and
- make full use of existing joint working across the MKSM area.

1.24 As a result it is proposed to re-structure the existing “Part A” section of the Sub-Regional Strategy on the following basis:

MKSM Policy 1: An Economic Strategy for Growth

This will be based on the emerging MKSM Economic Development Implementation Plan led by the 3 Regional Development Agencies, which will be available by the end of October 2009.

MKSM Policy 2: A Housing Strategy for Growth

This would set out housing provision at a strategic level up to 2031 and broad locational guidance, but district provision would be left to individual regional planning bodies to resolve where required.

MKSM Policy 3: A Transport Strategy for Growth

This would be based on the emerging MKSM Transport Strategy led by the MKSM Transport Board and on recently agreed Regional Funding Allocation advice.

MKSM Policy 4: Environment Infrastructure

This will be based on existing partnership working across MKSM and highlight strategic proposals (e.g. the Nene Valley Regional Park) and requirements (e.g. further water cycle studies), particularly in the light of climate change.

MKSM Policy 5: Implementation and Monitoring

This will be based on the MKSM Business Plan and set out a limited set of policy led key performance indicators for monitoring purposes.

1.25 Milton Keynes & South Midlands Question 1 – Do you agree with the proposed approach to reviewing the MKSM Part A Statement set out above?

Proposed Response – The approach proposed to the MKSM Part A Statement is supported. The West Northamptonshire Joint Strategic Planning Committee (JSPC) would welcome further information about how the regional planning bodies anticipate working closely with the JSPC and the individual authorities in West Northamptonshire to take forward the Part A Review.

West Northamptonshire Options for Future Development

1.26 The Partial Review considers each of the Housing Market Areas (HMA) within the region in turn. For the West Northamptonshire HMA the Partial Review sets out four options for accommodating growth to 2031:

- Option 1 – Continue with the current strategy of focusing development at the Principal Urban Area of Northampton and the Sub-Regional Centre of Daventry

- Option 2 – Focus significant additional development at Northampton to create a much larger urban area.
- Option 3 - Focus development at existing and improved public transport nodes.
- Option 4 – Focus growth more evenly across the area in a more dispersed pattern of development.

1.27 West Northamptonshire Housing Market Area Question 1 - Which of the four spatial planning and development options will best meet the needs of the West Northamptonshire Housing Market Area from 2021 and why?

and

1.28 West Northamptonshire Housing Market Area Question 2 – Should any other options be considered? If so, please explain and provide evidence to support these options.

Proposed Response – Without an indication of the level growth to be attributed to the West Northamptonshire HMA, and the consequent level of infrastructure improvement and funding requirements the growth options cannot be properly evaluated. In particular it is notable that the planned infrastructure plan for West Northamptonshire HMA as shown on the plan at page 87 of the Partial Review document shows very limited infrastructure improvements within the area. This is of particular concern given that the WNHMA is identified in the document as having the highest percentage increase in households to 2031 across the East Midlands Region which is both higher than the national average and the regional average, and in the context that responses to the recent consultation (especially by the Highways and Environment Agencies) on the West Northamptonshire Emergent Joint Core Strategy make clear that there are severe infrastructure deficits that must be addressed before further significant growth can be accommodated.

In the context of infrastructure the WNHMA receives:-

- Improvements to Junction 19 of the M1/A14 (lying just outside the WNHMA)
- High speed rail links to London and Birmingham
- M1 hard shoulder between junctions 13 to 19.

Infrastructure improvements have been identified and are required for the existing levels of growth to 2021. The lack of funding for these infrastructure improvements is a known issue. The Partial Review acknowledges the need for major transport, development and community infrastructure investment to support growth plans. However it is not clear from the Review how these will be delivered. It must be clear that any growth option taken forwards can be appropriately delivered with the necessary infrastructure. It must also be recognised that without the necessary infrastructure, the growth (under any options) simply cannot be delivered and plans for growth are therefore inappropriate.

Having regard to above major issues the JSPC is cautious in suggesting a preferred option without a greater depth of study of infrastructure delivery, the roles of other settlements and scale of growth.

Transport

- 1.29 The Regional Transport Strategy is an integral part of the Regional Plan. It must reflect Government transport policy and set out regional and sub-regional priorities that will support the delivery of new development and manage existing travel demand. In October 2008 the Regional Assembly published a summary of existing Regional Transport Conditions and Issues. In February 2009 the Regional Assembly and emda submitted joint advice to the Department of Transport on capital investment priorities up to 2014 along with more general priorities up to 2019, as part of the Government's Regional Funding Allocations consultation. Both the Conditions and Issues Report and the RFA advice has been used to inform the spatial development options set out for each HMA.
- 1.30 The Regional Assembly and emda are required to give the Government joint advice on strategic outcome priorities. Nine strategic outcome priorities are identified in the Partial Review consultation document under the following headings:
- Less (unsustainable) travel
 - Effective and efficient travel
 - Energy efficient travel
- 1.31 Eleven key regional challenges are then identified which the Partial Review advises will have to be met according to the particular circumstances of each HMA. These challenges also provide the priorities for further research. This will then provide clear strategic basis for developing transport solutions over the longer term that address real problems in the East Midlands. The challenges are identified as:
- Overcoming existing and future traffic congestion on strategic links and in urban areas.
 - Dealing with the additional demand for travel brought about mainly by regeneration and growth.
 - Overcoming gaps and weaknesses in the existing transport networks.
 - Raising the resilience of networks
 - Overcoming lack of awareness of sustainable travel options and inertia of individuals and businesses to change behaviour.
 - Identifying measures to reduce further the number of deaths and injury accidents, particularly on roads.
 - Identification and implementation of mechanisms to improve energy efficiency at regional level.
 - Overcoming noise, severance, vibration, local air quality and other issues affecting local communities.
 - Ensuring that new transport infrastructure does not impact negatively on eth environment.
 - Overcoming barriers to the use of sustainable modes such as ill health, fear of crime and cost.

- Reversing long standing travel behaviour and dependency on travel, particularly by private car.
- 1.32 The Partial Review sets out a proposed structure for the revised Regional Transport Strategy which would include a statement of committed investment.
 - 1.33 Transport Question 1 – Do the regional level outcomes set out above provide a sound basis for the review of the Regional Transport Strategy?
 - 1.34 Transport Question 2 – Do the regional level challenges set out above provide a sound basis for the identification of regional transport investment priorities?
 - 1.35 Transport Question 3 – Is the proposed structure for the revised Regional Transport Strategy sound and fit for purpose?

Proposed Response to all three Transport Questions - The identified regional level outcomes and challenges appropriately include the need for growth to be considered in the context of improving transport networks. There are no objections to the proposed structure for the revised Regional Transport Strategy.

The MKSM Inter-Urban Transport Study July 2009 indicates that the priorities for the sub-regional networks include a detailed study of the Northampton Arc (consisting of the A43/ A45 M1 J15A corridor). Paragraph 7.3.17 of the Study identifies that the 'arc' study will need to show that growth can be accommodated and will have relevance for the East Midlands Regional Spatial Strategy Review. The Transport Study comments that the Northampton growth agenda 'remains probably the most challenging of the growth nodes in the MKSM sub region'.

The Partial Review must acknowledge to a greater extent the need for transport infrastructure provision and funding to deliver the growth agenda for West Northamptonshire and in particular Northampton. Growth options and strategic options must be and can only be considered hand in hand with a movement network.

Renewable and low carbon energy generation

- 1.36 Reduction of demand and energy efficiency have been identified as key ways to contribute to national targets on climate change. The Partial Review considers that new developments are largely covered through the code for sustainable homes however existing homes will still form the majority of the housing stock and retrofitting energy efficiency measures to existing houses will be essential.
- 1.37 The Partial Review also considers that challenges and opportunities for renewable energy and low carbon generation will be different across the region. Consequently the Partial Review considers sub-regional targets for renewable energy would be too inflexible and proposes instead regional renewable and low carbon energy target along with carbon reduction target for each HMA and guidance on the most appropriate mix of technologies.
- 1.38 The consultation asks three broad questions on renewable and low carbon energy generation.

- 1.39 Renewable & Low Carbon Energy Generation Question 1 - What is the most appropriate mix of renewable and local carbon energy generation for the East Midlands as a whole and why?
- 1.40 Renewable & Low Carbon Energy Generation Question 2 - What is the most appropriate strategy for carbon emissions reduction in each of the Region's 10 Housing Market Areas and why?
- 1.41 Renewable & Low Carbon Energy Generation Question 3 - How can heat from electricity generation be used to meet local heating requirements and how can this be delivered most effectively?

Proposed Response to all 3 Renewable & Low Carbon Energy Generation - The West Northamptonshire Joint Strategic Planning Committee supports the proposal for the Regional Plan to set out regional renewable energy and low carbon energy targets along with carbon reduction targets for each HMA and guidance on the most appropriate mix of technologies.

Recommendation

- 1.42 As the consultation period for responses to the Partial Review closed after the date of the West Northamptonshire Joint Strategic Planning Committee comments have been submitted to the East Midlands Regional Assembly the Committee could either resolve to:-
- Agree the officer comments without changes; or
 - Agree to amend the officer comments, responding in a way that the Committee considers appropriate taking into account the report; or
 - Agree to withdraw the officer comments and make no response to the consultation
- 1.43 It is suggested that the Committee endorse the Officer comments that have already been submitted to the East Midlands Regional Assembly, however it is appreciated that the Committee may wish to add variations to the proposed comments in the light of the report. To make no comment on the partial review would miss an important opportunity to influence the further thinking on the regional perspective for on housing, transport and climate change and to draw attention to the need for a growth agenda to be properly supported by evidence based employment opportunities and the necessary social, community and physical infrastructure and funding to achieve this.