Representations to the Sustainability Appraisal accompanying the South Northamptonshire Local Plan – Part 2a

Land North of Towcester

November 2018
# Contents

1. **Introduction** 3  
2. **SA Methodology Critique** 5  
3. **Independent Sustainability Appraisal of Land North of Towcester** 5  

Appendix 1: **Sustainability Appraisal Summary** 10

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**Client**  
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**Our reference**  
IMPQ3006

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1. **Introduction**

1.1 These representations are made on behalf of IM Properties Plc in response to the Sustainability Appraisal (SA) and SA addendum accompanying The South Northamptonshire Local Plan Part 2a Proposed Submission consultation which runs from 4th October to noon (GMT) on Friday 16 November 2018.

1.2 The submission draft Local Plan Part 2 provides emerging policies and site allocations that sit alongside and add detail to the West Northamptonshire Joint Core Strategy Local Plan (Part 1), adopted in 2014.

1.3 The SA addendum report assesses the sustainability implications of the proposed modifications to the Local Plan Part 2a which have arisen following the consultation in November, 2017. The material changes to the Local Plan are described within the SA addendum as follows:

- New Policy, GS 1: Open Space and Recreation;
- Amended Policy SS 2: General Development Principles; and SDP (1–7) Design Principles;
- Removal of Policy T5: Towcester Racecourse;
- New Policy, CON 1: Proposed safeguarding route for the A5 Relief Road at Towcester;
- Amended Policy CON 3: Canal Facilities and New Marinas;
- New Policy, AL 3: Land at Tiffield Lane, Towcester;
- Removal of Policy, NRDA 1: Residential Development Adjoining the NRDA (Northampton Related Development Area);
- Removal of Policy PLANH (LOAN) policy; and
- New policy, Policy EMP 5: Leisure and Tourism and Whittlebury Hall
- New policy, Policy NE 1: Upper Nene Gravel Pits SPA

1.4 IM Properties fully support the allocation of Land at Tiffield Lane, Towcester (Policy –AL 3) and agree that this constitutes a reasonable alternative for a sustainable and deliverable employment allocation at Towcester.

1.5 With regards to the previous representations submitted to the Local Plan, the allocation of Land at Tiffield with an associated positive SA scoring has largely addressed the concerns previously raised by IM Properties.

1.6 To further assist South Northamptonshire District Council and ensure a robust SA process, IM properties have reviewed the SA Addendum and make the following comments which are discussion in greater detail within Section 2.
This report is structured as follows:

1.7.1 Section 2 – A review of the SA Addendum methodology in relation to the procedures required by the SEA regulations and;

1.7.2 Section 3 – A review of the SA of the Land North of Towcester (Tiffield Lane) to ensure the correct and most recent technical data has been utilised by the Council and that all positives have been recognised.
2. **Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment Directive**

2.1 The Environmental Assessment of Plans and Programmes Regulations (hereafter referred to as The SEA Regulations) require the production and publication of an Environmental Report to accompany Local Plan documents that are likely to have a significant effect on the environment.

2.2 Section 19 of the Planning and Compulsory Purchase Act (2004) also places a requirement upon Local Planning Authorities (LPAs) to carry out a Sustainability Appraisal (SA) to assess the likely social, economic and environmental effects of a Local Plan.

2.3 The Proposed Submission Local Plan document is therefore supported by a Sustainability Appraisal (SA) process that incorporates the requirements of The SEA Regulations resulting in a single SEA/ SA output referred to as Sustainability Appraisal (SA) Reports.

2.4 The SA reporting for the South Northamptonshire Local Plan Part 2a has been carried out by Ramboll ENVIRON, an independent consultancy appointed by the Council. A full SA Report was submitted in support of the Part 2 Local Plan with a SA Addendum produced in support of the proposed modifications to the Local Plan. IM Properties consider such an approach to be fully supported by the Planning Practice Guidance (PPG) of which the most relevant paragraph is listed below:

> Where the LPA assesses that necessary changes are significant, and were not previously subject to sustainability appraisal, then further sustainability appraisal may be required, and the sustainability appraisal report should be updated and amended accordingly (Planning Practice Guidance Paragraph: 023 Reference ID: 11-023-20140306).

2.5 In this instance, the Council issued a list of material changes to the Local Plan Part 2 to Ramboll who have prepared an SA Addendum which assesses the proposed modifications; a mix of policies being removed, amended policies and new policies are subject to SA.

2.6 The SA tests each of the proposed changes against the SA Framework and notes that there are no significant negative or uncertain effects.

2.7 The SA Addendum does note however that there will be significant positive effects associated with the following proposed changes:

- The Towcester allocation (AL 3 Tiffield Lane) has been added to the Local Plan and will have a significant positive effect on the economy; and

- The Upper Nene Gravel Pits Policy has been added to the Local Plan and will have a significant positive effect on biodiversity and townscape and landscape as
a result of protecting sightlines for birds within 3km of the SPA and provision of a strong emphasis on enhancement of greenspace.

2.8 IM Properties fully support these conclusions and the methodology utilised in preparation of the SA Addendum.

2.9 Section 3 of these representations review the assessment of Policy AL 3 in greater details however IM Properties are fully supportive of the conclusion that AL 3 will have a significant positive benefit on the economy of South Northamptonshire given its deliverability and market demand for high quality employment land.

2.10 Furthermore the allocation of employment land at Towcester represents a highly sustainable option given that Towcester is identified as one of the most sustainable settlement in South Northamptonshire.
3. Sustainability Appraisal of Land North of Towcester

3.1 The Land North of Towcester site was independently assessed against the SA objectives by Turley Sustainability in September 2017 to provide a comparative scoring for the site against the draft allocations and demonstrate the strong sustainability performance of the Land North of Towcester for employment development.

3.2 Since then, the Council have assessed the site as draft Policy AL3 (Land at Tiffield Lane) as a proposed allocation for a sustainable employment park.

3.3 Appendix A of the SA Addendum provides the full SA of the various employment sites and shows the removal of Towcester Racecourse site and the addition of Land at Tiffield Lane for allocation. The SA summary of the Tiffield Lane site allocation is as follows:

“No significant negative or uncertain effects. The policy will have a significant positive effect on sustainability objective 8: Labour market and economy. The site provides for 21 hectares of new mixed employment generating development. The variety of employment types reflects the need for diversity and resilience in the local economy as expressed in the Council’s Economic Growth Strategy. The effect on the other SA objectives is neutral or minor positive.”

3.4 The Tiffield Lane site records no negative effects upon the Councils SA objectives. The site records a minor or major positive impact against 10 of the 14 SA Objectives. Such a conclusion is strongly supported by IM Properties as the site offers a highly sustainable location for employment development within South Northamptonshire.

3.5 The deliverability and lack of constraints to development are presented in the Delivery Document submitted with these representations. This section of these representations utilises the technical evidence presented within this document to support any proposed amendments to the SA scoring or summary.

3.6 However, based on the previous independent SA of the Land North of Towcester (Tiffield Lane) and the availability of additional technical evidence commissioned by IM Properties, we believe further improvements to the SA Scoring are justified with respect to the following SA objectives

(ii) Archaeology and cultural heritage

(vi) Energy and climatic factors

(xii) Soil, geology and land use

(ii) Archaeology and cultural heritage

3.7 IM Properties agree that the proposed Tiffield Lane allocation site contains no designated or non-designated historic assets but further work will be undertaken to
confirm this. With regards to potential heritage impacts, survey work will be undertaken however a preliminary assessment confirms that there is unlikely to be any impacts upon heritage assets as a result of the proposed development.

3.8 Although impacts upon both heritage and archaeological assets are considered unlikely is it considered reasonable to allocate a minor positive score to this SA objective at this stage.

(vi) Energy and Climatic factors

3.9 The Local Plan policy requires the demonstration of climate change mitigation and adaptation measures including a Strategic Flood Risk Assessment for the site and use of Sustainable urban drainage techniques, as well as good accessibility to public transport services (thus helping to minimise car use and carbon emissions).

3.10 A preliminary Flood Risk Assessment of the site has been carried which confirms that the site is within an area of very low flood risk.

3.11 As part of a future planning application, IM Properties will ensure that Land at Tiffield Lane will assess the potential impact upon the proposed development from the future effects of climate change and ensure that appropriate resilience measures are integrated.

3.12 With regards to climate change mitigation and Greenhouse gas emissions, there are substantial benefits associated with the location of Tiffield lane which include:

   (i) Towcester is identified as one of the most sustainable settlement in South Northamptonshire and therefore it is considered likely that future employees can commute to work via sustainable modes of transportation such as walking, cycling and public transportation.

   (ii) With regards to sustainable transportation, a travel plan containing a list of measures to promote sustainable modes of transportation (and therefore reducing greenhouse gas (GHG) emissions will be provided

   (iii) The site has excellent access to the local and strategic highways network which will maximise efficient transportation of goods to and from the site

3.13 With regards to energy use within their new developments, IM Properties are committed to the development of energy efficient, low carbon buildings that target an EPA rating of A as a minimum.

3.14 Given the above, IM Properties consider it reasonable for the site to receive a minor positive rating although when compared to other allocations and the likely mitigation measures to be utilised, would also consider a major positive score would also be justified.
Soil, geology and land use

3.15 The site is previously undeveloped and has a Grade 3 agricultural land classification which has at this time not been defined into a sub-grade of 3a or 3b via a detailed survey. This further work will be carried out though it is considered that development of the site is unlikely to lead to the loss of the best and most versatile land (given its definition as Grades 1 and 2).

3.16 The Land North of Towcester is not expected to impact upon any geological characteristics and does not fall within or affect a Minerals Safeguarding Area.

3.17 Overall, IM Properties are of the opinion that the site is likely to have a minor positive effect on this SA objective.

Site SA Conclusions

3.18 Overall, IM Properties are of the opinion that the SA scoring for the Land North of Towcester whilst providing clear justification for the allocation of the suite for employment development, can be further improved in light of additional technical work commissioned by IM Properties to demonstrate its deliverability.

3.19 As part of any future planning application, detailed technical assessment work will be provided to demonstrate there are no constraints to the development of the site.

3.20 In summary, Land at Tifffield Lane (Policy AL3) fully justifies its allocation as a reasonable alternative for a sustainable employment park within the South Northamptonshire Local Plan Part 2 given its deliverability, lack of constraints to development and the social, economic and environmental benefits that will arise from the proposed development.
## Appendix 1: Sustainability Appraisal Summary

<table>
<thead>
<tr>
<th>SO1</th>
<th>Air quality and noise</th>
<th>+</th>
<th>+</th>
<th>Reduce the need to travel, well connected to sustainable settlement. Location offers new employment opportunities to the north of the town with no air quality or noise constraints. The site can be delivered without significant infrastructure requirements in a relatively short term.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO2</td>
<td>Archaeology and cultural heritage</td>
<td>+</td>
<td>+</td>
<td>No heritage assets within the site.</td>
</tr>
<tr>
<td>SO3</td>
<td>Biodiversity, flora and fauna</td>
<td>+</td>
<td>+</td>
<td>Agricultural land with some ecological features. Appropriate avoidance, mitigation and enhancement to form part of detailed proposals based on recommendations for Ecologist.</td>
</tr>
<tr>
<td>SO4</td>
<td>Crime and community safety</td>
<td>+</td>
<td>+</td>
<td>Provision of a safe and inclusive environment which maximises personal safety and minimises opportunities for crime and anti-social behaviour.</td>
</tr>
<tr>
<td>SO5</td>
<td>Education and training</td>
<td>0</td>
<td>0</td>
<td>No new education and training facilities, and no impacts on existing facilities.</td>
</tr>
<tr>
<td>SO6</td>
<td>Energy and climatic factors</td>
<td>+</td>
<td>+</td>
<td>The development proposals will provide energy efficient buildings that incorporate low carbon technologies where appropriate and consideration of climate change adaptation measures.</td>
</tr>
<tr>
<td>SO7</td>
<td>Health and well being</td>
<td>+</td>
<td>+</td>
<td>Provision of new footpaths and cycleways that link to existing networks. No improved community facilities.</td>
</tr>
<tr>
<td>SO8</td>
<td>Labour market and economy</td>
<td>++</td>
<td>++</td>
<td>Variety of employment uses, location helps to address in / out commuting.</td>
</tr>
<tr>
<td>SO9</td>
<td>Landscape and townscape</td>
<td>+</td>
<td>+</td>
<td>Grade 3 classification, low LVIA impact and creation of new green edge.</td>
</tr>
<tr>
<td>SO10</td>
<td>Material assets</td>
<td>0</td>
<td>0</td>
<td>Housing based objective - neutral impact for employment uses.</td>
</tr>
<tr>
<td>SO11</td>
<td>Population and social deprivation</td>
<td>+</td>
<td>+</td>
<td>Mixed employment, no community facilities proposed but financial contributions to the Council.</td>
</tr>
<tr>
<td>SO12</td>
<td>Soil, geology, land use</td>
<td>0</td>
<td>+</td>
<td>Greenfield land (Grade 3 classification), not within a Minerals Safeguarding Area.</td>
</tr>
<tr>
<td>SO13</td>
<td>Waste</td>
<td>0</td>
<td>0</td>
<td>Adequate utility infrastructure including waste management.</td>
</tr>
<tr>
<td>SO14</td>
<td>Water</td>
<td>+</td>
<td>+</td>
<td>Low Flood Risk (Zone 1), SUDs and surface water management proposed to ensure mitigation of any flooding issues from minor water course.</td>
</tr>
<tr>
<td>Notes - Land North of Towcester</td>
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</tbody>
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