South Northamptonshire (Part 2) Local Plan Draft Submission (regulation 19 consultation)

Response to question 4 (1)

1) The preparation of the Part 2 Local Plan is to be examined against the Framework 2012. It is submitted Policy NE2 Special Landscape Areas (SLA) is not justified by proportionate evidence and fails the test of soundness (paragraph 182).

2) The designation of a Special Landscape Area on the Proposals Map is as stated at paragraph 11.3.1 ‘in recognition of the fact that some areas of the district are of even greater landscape value’. It is hence necessary as part of the plan making process that evidence is advanced to justify the designation of an SLA so as to provide the distinction between landscapes that have ‘Special’ qualities and other landscapes. These submissions are particularly directed at the designation of the Hemplow Hills, Cottesbrooke, and Brington Special Landscape Area.

3) In December 2013 the West Northamptonshire Joint Strategic Planning Committee published its proposed Main Modifications to the WNJCS which included a new Policy E8 (“Northampton Junction 16 Strategic Employment Site”) under MM26. This modification recognised the importance of the area as a location for strategic distribution activities (proposed paragraph 8.38) and noted that there would not be adequate employment land to accommodate the planned growth of this sector of the economy in the area (proposed paragraph 8.39). Thus, proposed paragraph 8.40 said:

   i. ‘[A] strategic allocation for additional employment land is identified at a location adjacent to the East and North (sic) of Junction 16 of the M1 Motorway. The total area of the site covers 171ha (gross) extending west to east along the A4500 corridor running towards the village of Harpole and the built urban area of Northampton beyond. The allocation extends to the north and south of the A4500 with the majority of the land area (131ha) located to the north of this route.’

4) The test of soundness (justified 182) includes the need for the Plan to be the most appropriate strategy (emphasis added) to deliver sustainable development and be properly evidence based.
This test must reasonably include the fact that the West Northants Joint Core Strategy (WNJCS) recognised that future shortfalls in employment land would arise, supported the allocation of the entire site north and south of the A4500, and did not support the restriction of development on the north side of the A4500 based on landscape concerns.

5) The Inspector’s Report in 2014 was based on a cautious approach seeking further evidence based justification for the allocation of the entire site at Junction 16. The Report did not rule out development as contained in the Main Modifications.

6) The location at Junction 16 is ideally situated for logistics use. This land use is highly in demand and demand is likely to increase given the importance of logistics in providing continuous supply chains for manufacturing industries. Indeed in a post Brexit world the demand for logistics floorspace is reasonably likely to increase further as manufacturing companies, for example, within the automobile industry, require to hold increased levels of component stock so as to mitigate against disruption to production lines in the event of cross channel delays and other difficulties. This process is called ‘logistics buffering’. The increasing demand for logistics floorspace is further stimulated by an increase in online retailing and the higher expectation of customers for the delivery of product within very short periods of time. The increasing expectation of short delivery times requires substantial logistics floorspace to be provided close to market demand.

7) Development has already commenced at Pannatoni Park (south of the A4500) pursuant to the adopted WNJCS Policy E8 and is demonstrative of market delivery. Substantial occupier demand has been received and full development of this site will be rapidly realised. This actual development presents a material change in circumstances to that prevailing at the time the Core Strategy was undergoing its plan making process. The delivery of this site has an impact on the surrounding landscape and a consequential influence on future patterns of development in response to employment needs.
The Framework 2012 (Paragraph 18) states that Government is committed to securing economic growth in order to create jobs and property, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. Paragraph 19 Framework 2012 states:

i. *The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system*. 

The planning policies which underpin the overall planning objective for Building a strong, competitive economy remain largely unchanged between the 2012 Framework and 2018 Framework (2012:(21); 2018(81)). It is a fundamental objective for policies to ‘proactively encourage sustainable economic growth’. Paragraph 82 of the 2018 Framework goes further, specifically recognising the requirements of the logistics sector:

i. *Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.*

It is acknowledged that the intention is for this Plan to be submitted under the transitional arrangements set out within Appendix 1 of the Framework 2018 and will therefore be examined against the 2012 document. However as stated at paragraph 1.1.4 regard should be given to the revised NPPF where relevant. The fundamental objective for policies to encourage sustainable economic growth is a consistent objective within National Planning Policy.
11) The designation of the SLA for the Hemplow Hills is inconsistent with the future provision of land to meet development needs and is not the most appropriate strategy for this Part 2 Plan.

12) A second fundamental criticism of policy NE2, and especially in its application to the Hemplow Hills SLA is the flawed evidence base to its designation. The designation of a SLA should be justified against the evaluation of objective criteria to distinguish the value of a particular landscape from other landscapes of no distinguishing merit. It is not justified for the purposes of paragraph 182 of the 2012 Framework for the Part 2 Plan to simply ‘carry forward’ the extent of the SLA’s as identified in the South Northamptonshire Local Plan 1997. The Northamptonshire Current Landscape Character Assessment 2000 acknowledges that the designation of the SLAs in the earlier development plans should be replaced by more appropriately based objective landscape, visual and other criteria.

13) While it is acknowledged that the Guidelines for Landscape and Visual Assessment 3rd Edition (GLVIA 3) published by the Landscape Institute are not national policy, such guidelines provide a recognised industry standard as to an appropriate approach which should be taken when identifying landscapes of distinguishing characteristics. It is evident from the accompanying report prepared by EDP (Hemplow Hills, Cottesbrooke and Brington Special Landscape Area Position Note) that the analysis undertaken for Quartett designs is flawed in its methodology – and is an unreliable basis to define SLAs on the Proposals Map within the Part 2 Plan.

14) The justification for SLAs within South Northampton is inconsistent with the approach taken to the identification of SLAs in Daventry District which has reasonably followed the guidance in GLVIA 3 and creates an unsatisfactory situation within two administrative areas which are subject to the West Northants Joint Core Strategy, in terms of their different approach to the same SLA.
Conclusion

15) It is submitted that in consequence of the lack of justification in the designation of SLAs within the Part 2 Plan such a designation should either:

1. Be properly and objectively reconsidered with proportionate evidence to ensure that it is consistent with the most appropriate strategy for sustainable development (Framework 182).

Or,

2. Be withdrawn from the Part 2 Plan and be properly assessed within a future Core Strategy Review.