South Northamptonshire Council Local Plan Part 2
Regulation 22 Consultation Statement

January 2018
1. INTRODUCTION

Purpose of the Consultation Statement

1.1 This Consultation Statements presents how South Northamptonshire Council undertook consultation to inform the Submission Part 2 Local Plan.

1.2 The document summarises:

- how we consulted,
- who was invited to make representations,
- a summary of the main issues raised by the representations and how these have been addressed in the Submission Part 2 Local Plan.

1.3 The Consultation statement forms one of the submission documents referred to in Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Regulatory Context for Consultation and Engagement

1.4 The preparation of the Part 2 Local Plan must comply with the National Planning Policy Framework (NPPF) and the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.5 Section 18 of the Planning and Compulsory Purchase Act 2004, requires Local Planning Authorities (LPAs) to produce a ‘Statement of Community Involvement’ (SCI), explaining how they will engage local communities and other interested parties in the production of their local plan and in the determination of planning applications. Section 19 of this Act imposes the requirement for all development plan documents, such as the Local Plan, to comply with the SCI.

1.6 The SCI outlines that the Council is committed to effective community engagement, and seeks to use a wide range of methods for involving the community in the plan making process.

1.7 Regulation 18 of the 2012 Regulations specifies the consultation a LPA must undertake on a Local Plan before it can proceed to publish a Publication Version of the Local Plan.
1.8 Regulation 18 represents the first statutory stage in preparing a local plan. It specifies the requirements for who must be notified of the preparation of the plan, that they must be invited to comments on its content and that their comments must be taken into account.

The Town and Country Planning (Local Planning) (England) Regulations 2012
Preparation of a local plan
18.—(1) A local planning authority must—
(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—
(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
(b) such of the general consultation bodies as the local planning authority consider appropriate; and
(c) such residents or other persons carrying on business in the local planning authority’s area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

1.9 Duty to Cooperate

1.10 This consultation statement provides a record of the formal stages of consultation on the Local Plan. However Section 33A (1) and (3) of the Planning and Compulsory Purchase Act 2004 (as amended) also places a duty on a local planning authority to co-operate with other local planning authorities and other prescribed bodies when it undertakes certain activities, including the preparation of development plan documents, activities that can reasonably be considered to prepare the way for such preparation and activities so far as they relate to a strategic matter. This is to maximise the effectiveness with which those activities are undertaken.

1.11 Section 33A (2) requires a local planning authority ‘to engage constructively, actively and on an on-going basis’ in respect of the activities that are subject to the duty.
1.12 The local planning authorities that border South Northamptonshire Council are:

- Aylesbury Vale District Council
- Buckinghamshire County Council
- Cherwell District Council
- Daventry District Council
- Milton Keynes Council
- Northampton Borough Council
- Northamptonshire County Council
- The North Northamptonshire Joint Planning unit and its partner local authorities
- Oxfordshire County Council
- Stratford-on- Avon District Council
- Warwickshire County Council

1.13 Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the other prescribed bodies for the purpose of implementing Section 33A of the 2004 Act. The Statement of Community Involvement lists those bodies that are considered relevant to South Northamptonshire District. Full details of how the Council has engaged with those bodies will be set out through the Council’s supporting ‘Duty to Cooperate’ Statement.

2 OVERVIEW OF CONSULTATION

2.1 South Northamptonshire Council undertook two Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:

1) The Options consultation took place during April–June 2016 over a 10 week period

2) The Preferred Options consultation was undertaken between September – Nov 2017 over a 10 week period.

2.2 Therefore, in total we have consulted for 20 weeks to provide input and comment on the emerging local plan part 2. This significantly exceeds the six weeks statutory period stipulated in the Regulations.

2.3 This statement sets out both Regulation 18 and 19 consultations, and the issues consultation that started this iterative process. The consultation statement will assist the Inspector at the examination in determining whether the district’s Local Plan Part 2 complies with the requirements for public consultation and government guidance.
2.4 The statement will show that the consultation carried out complied with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). It also shows that public involvement was carried out following the approaches set out in South Northamptonshire’s Council Statement of Community Involvement (SCI).

2.5 Table 1 below shows the timetable and stages that are involved in the preparation of the Local Plan Part 2.

Table 1: Local Plan Part 2 timetable

<table>
<thead>
<tr>
<th>STAGE</th>
<th>DATE</th>
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<tbody>
<tr>
<td>3. Consultation on Draft document (Regulation 18)</td>
<td>September 2017 – November 2017</td>
</tr>
<tr>
<td>4. Proposed Submission Consultation (Regulation 19)</td>
<td>September 2018</td>
</tr>
<tr>
<td>5. Submission to Secretary of State (Regulation 22)</td>
<td>December 2018</td>
</tr>
<tr>
<td>6. Commencement of Examination (Regulation 24)</td>
<td>March 2019</td>
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<tr>
<td>7. Adoption of DPD (Regulation 26)</td>
<td>September 2019</td>
</tr>
</tbody>
</table>

3 PREPARATION OF EVIDENCE BASE AND SEEKING INITIAL VIEWS ABOUT THE LOCAL PLAN PART 2

3.1 In line with the Council’s commitment to early and meaningful community engagement, extensive public consultation has preceded, and informed, each stage of the Plan’s preparation.

3.2 The Council has undertaken a significant amount of work in compiling an evidence base to support the Part 2 Local Plan. This has involved the completion of a number of studies as well as working with key stakeholders, organisations and groups across the district. Details of the evidence base and supporting studies used to prepare the Local Plan Part 2 can be found on

Who has been involved?

3.3 During the early stages of the development of the Local Plan, the Council developed a comprehensive excel consultation database which included residents, elected representatives, community and voluntary groups, developers and businesses, infrastructure providers, government agencies and other prescribed bodies (as detailed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The database has grown significantly as the plan has developed and has been updated with individuals / organisations formally requesting to be kept informed of the Plan and added to the database (or alternatively wishing to be removed from the database).

3.4 In addition to the excel consultation database, prior to the Options consultation in April – June 2016, the Council set up an online consultation system – INOVEM. This has allowed consultees to respond directly online to consultation documents and has also provided the facility for individuals/organisations to register their details and to receive future notifications on further Local Plan consultations or other consultations.

3.5 As a matter of course, prior to the commencement of any consultation activity, all contacts within the excel consultee database and the INOVEM database were notified of the impending consultation by either postal or electronic means that set out:

- The nature of the consultation that was about to commence
- What the consultation was on
- The duration of the consultation (included start/end dates)
- How consultees could find out more information either on the Council’s website or where documents would be available to view in a hard copy format, such as at the council offices and/or libraries.
- Contact details for the planning policy team. A dedicated email address was set up to direct queries and representations on the Local Plan consultations.
- Links to the consultation information.
Consultation with Statutory and Non-statutory bodies

3.6 Planning issues are not constrained to local authority boundaries. The National Planning Policy Framework states that public bodies have a duty to co-operate on planning issues that cross administrative boundaries.

4.0 ISSUES AND OPTIONS CONSULTATION

ISSUES CONSULTATION

4.1 The development of the Part 2 Local Plan commenced late 2013, with the issues consultation. This consultation set out the main issues that were considered to affect the district. The issues did not suggest specific policies or proposals to be included within the local plan; instead it highlighted the important and relevant issues that needed to be taken into account during the plan period.

4.2 This consultation provided an opportunity for the public, parish council, development industry including the specific and general consultation bodies as appropriate to gather their views on the issues that should be covered in the Local Plan Part 2.

4.3 Promotion of the consultation period

4.4 The issues consultation took place during a 13 week period from 28th October 2013 until the 24th January 2014.

4.5 A Local Plan Issues Paper was published on the Council’s website, a number of Local Plan topic papers were also produced, all of the documents were accessible on-line and in hard copy format. The topic papers consisted of the following:

- Topic paper on village confines
- Topic paper on Settlement hierarchy
- Summary leaflets on Towcester and Brackley
- Summary leaflet on the villages
- Summary leaflet on the Countryside

4.6 In addition to the above consultation documents, the issues consultation also provided an opportunity for possible development sites to be suggested to the Council via a ‘Call for Sites’ exercise.
4.7 **How the public consultation was carried out**

4.8 In accordance with the Councils Statement of Community Involvement (SCI) consultation arrangements included:

- Consultation over 13 weeks
- Emails and/or letters informing consultees of consultation dates and how to view and respond to the consultation material
- An advertisement was placed in the local press
- All documents were made available on the Council’s website
- Parish council workshops were held on the 12th and 13th November 2013
- Posters were sent to parish council and libraries to publicise the consultation with details on how to view the documents and make comments
- An article appeared in an edition of the South Northamptonshire resident magazine News and Views

4.9 In addition to public consultation, a parish council audit of services and facilities took place. This audit was sent to each of the parish council’s across the district and asked a series of questions relating to the level and frequency of services and facilities within each of the parishes. This would provide the initial data to support the settlement hierarchy work.

4.10 **Making comments on the issues consultation:**

4.11 Comments could be made using a variety of methods:

- Responses could be made in writing either by post or email
- A planning policy email address was available for representations to be sent to

4.12 **Key issues arising from the issues consultation**

4.13 The consultation resulted in 500 representations being received, these are available online for viewing. In summary the key issues raised during the consultation were:

- To undertake a realistic assessment of a settlement’s capacity to accommodate growth;
- To rank villages with greater services and facilities as the most sustainable villages;
• To recognise the individual nature of villages and towns which make up the rural areas a cluster approach to grouping settlements together that can share services and facilities may be appropriate for some of the smaller villages, but may not however be relevant in all circumstances;

• That the form and siting of the development should be looked at on an individual basis; factors such as the village size, location, existing facilities, aspirations for growth and facility capacity are among the factors that will affect the level, location and type of development that may be suitable;

• That development of a scale beyond that identified as being required to meet local needs should be considered where existing local services are at risk of closing, or where new facilities would be of benefit to the community;

• The Council must identify that whilst it is important to plan for residential accommodation for lower income households, it is equally important to include accommodation for those on higher incomes;

• That the Local Plan Part 2 should require a proportion of affordable housing provision to come forward with any residential development, however the level should be carefully considered to ensure that it is appropriate to the requirement within the district while not inhibiting development;

• Consideration should be given, not only to how other policies may bring benefits to the historic environment of the area, but also how the historic environment can help to contribute to achieving the objectives of other policy areas;

• That ‘Heritage assets’ should include local heritage assets (buildings and other structures, undesignated parkland etc. especially any assets on a Local List). A future landscape character and sensitivity study should include historic landscape characterisation and an understanding of key landscape sites and features, such as parks and gardens and ridge and furrow;

• Consideration should be given, not only to how other policies may bring benefits to the historic environment of the area, but also how the historic environment can help to contribute to achieving the objectives of other policy areas;
• That it is vital that the planning system does not inhibit business; clear evidence that businesses, including rural business, are vital to the success of economic recovery and businesses should be supported through the planning system;

• That diversification will be critical to the survival of small and medium sized family farming activity. Diversification for family farms can result in increased “local” employment opportunities and through the profits generated will encourage re-investment in the upkeep of our countryside;

• The provision of facilities and community benefit in towns as part of new development needs to be considered in the context of financial viability;

• That provision be made in all developments for cycling and walking access as well as for cycle parking provision;

• There may be a case for having a criteria-based policy as well as establishing confine boundaries for most settlements. This would overcome the major objection of defining village confines/envelopes as they represent a general presumption in favour of development;

• Confines should be based on clear and identifiable existing physical boundaries.

• Further sites were submitted for consideration for housing and employment development in a number of settlements

• Suggestions were made for amendments to the village confines

4.14 OPTIONS CONSULTATION (Regulation 18)

4.15 The options consultation helped to test options and subsequently identify policies and land allocations that could be identified in the next stage of the Local Plan Part 2.

4.16 This consultation set out the key matters impacting the district and suggested options that specifically considered the scale of development, settlement hierarchy, options for environmental designations, options for the location of new employment sites, views on updating village and town confines.

4.17 The consultation material included:
4.18 Promotion of the consultation period

4.19 The Options Consultation was carried out between 4 April 2016 until 12 noon on the 17 June 2016. This provided a 10 week consultation period, which far exceeded the six week period required under the regulations.

4.20 The options consultation was promoted through a variety of ways. Whilst the primary method of promotion was through emails, local newspaper, adverts, posters and the website, the other methods included:

- Mail out to all those who had asked to go on our consultation database;
- Touring public display boards/banners in Council Offices and libraries across the district;
- Hard copies of the consultation documents were in each of the five libraries across the district;
- An article was placed in the council’s resident magazine ‘SNC Review’ which is distributed to every household in the district;
- A press release;
- An article was placed in the local newspapers;
- An advert on the Council website;
- Hard copies of the consultation material were available on the South Northants Volunteer Bureau Bus which toured the rural areas;
- Promotion via social media (Facebook and Twitter);
- Posters were sent to parish councils to publicise the consultation on their parish notice boards;
- Internal Council communication to officers and elected members.
4.21 **How the public consultation was carried out**

4.22 A major component of the consultation was the questionnaire. This contained 42 questions and was embedded into the main background document. For easier access a shortened version of the background document was published and this also included the questionnaire.

4.23 The questions were grouped around common themes and sought views on:

- Vision and Objectives
- Settlement hierarchy
- Scale of housing
- Housing for older people
- Housing for young people
- Starter homes
- Affordable housing
- Self build
- Housing design
- Health and Wellbeing
- Environmental considerations
- Local green space designation
- Special landscape areas
- Green wedges /areas of separation
- Transport and accessibility
- Economic advantage
- Community and leisure
- Confines and re-establishment

4.24 In addition to the questionnaire, stakeholders could become involved and provide their input using other consultation methods, including:

- Focused stakeholder engagement
- Parish Council and elected member session dates 12th April (5pm-7pm) and 19th April 2016 (6pm-8pm)
- Internal briefing for relevant staff – 15th March 2016 (10am-12)
- Drop in sessions at The Forum; Towcester

4.25 All events were attended by members of the Planning Policy team

4.26 **Making comments on the options**

4.27 Comments could be made using a variety of methods

- Online consultation system (INOVEM). This is the Council’s preferred means of receiving representations as it is the fastest and most accurate
method, helping the Council to manage representations quickly and efficiently. The online system has allowed people to save their response, add to or review it at a later stage. By adding their details people also had the option of registering for notifications on other consultations. You can access the portal here:

- The questionnaire could be completed on-line using the online consultation system. Alternatively the questionnaire could be downloaded and completed and sent back via either email or through the post, the questionnaire was placed on the Council’s website as a PDF to enable this to happen.

- Hard copies of the questionnaire, the main options consultation document and a summary document were made available at events and from the Council offices in Towcester.

- Stakeholders could respond to the consultation using a response form, this was located on the website. It could be completed on-line or alternatively downloaded and then once completed, the response form could be handed in to the council offices or returned by email or post.

- A bespoke email address was set up so people could email their comments to us

- Comments could be made in writing

- Comments could be made on any options raised in the report, as well as suggesting others.

4.28 **Key issues arising from the options consultation**

4.29 There were 262 responses\(^\text{vi}\) to the questionnaire and further comments were received through other feedback mechanisms.

4.30 The consultation responses highlighted a number of key issues. The following provides a summary of the issues raised during the options consultation.

4.31 **Local Plan objectives and vision**

- The vision should also include a requirement to improve, sustain and maintain local infrastructure particularly roads and public facilities

- Rural areas should remain rural and future development should meet local needs to address specific sections of the community in both housing mix, infrastructure and affordability
• Need to add an objective that development does not lead to coalescence between rural areas and communities

• Need to refer to biodiversity, wildlife and environmental character and tranquillity

4.32 Sustainable communities

• The provision of new and improved green spaces, leisure and recreation and sports facilities and walkways and cycle tracks to encourage and enable more active and healthy lifestyles

• All houses should have a sensible garden plot

• Local green space designation should not be used extensively.

4.33 Spatial strategy

• Villages who do not have confines should have them reinstated with immediate effect

• The relationship with rural service centres is more significant for sustainability then a clustering of local villages

• Strict settlement boundaries does not allow adequate flexibility for development to come forward outside the settlement boundary if this is required

4.34 Housing

• Provision should be made for housing of all types to meet the diverse needs and aspirations of older people

• All parishes to take their share as we need more houses. However these should be locally agreed sites where possible, not imposed.

• To ensure that the needs of individual settlements are met, and in recognition of the need to plan positively to meet at a minimum the OAN of the area, further growth should be identified for the rural areas.

• 5% of all dwellings should be bungalows for the elderly to free up housing stock for others

• Housing should be according to local need and sustainability criteria

• All settlements should have accommodation for older and younger people
• Limited development will allow villages to meet the needs of residents especially to enable upsizing or downsizing without the need to move away from the community

• Self build is a great way to ensure people are able to obtain the type of housing they require rather than the off the shelf offering normally found on developments

• Suggestions were made for changes to village confines

• Sites were submitted for consideration for residential / employment development

4.35 Housing in the urban areas

• Towcester and Brackley are the main settlements of the District and should remain the focus for accommodating housing growth over the plan period

• Building in already established urban areas is far more preferable than on green land or expansion. Development of brown field sites is preferable to any public green spaces

4.36 Housing in the rural areas

• All parishes should take their share as we need more homes. However these should be from locally agreed sites where possible, not imposed.

• Rural settlements cannot be allowed to stagnate and fossilise. Continued sustainable growth is essential to support and retain local services and facilities and encourage local economic growth

• Limited development will allow villages to meet the needs of residents especially to enable upsizing or downsizing without the need to move away from the community

4.37 The Economy

• Whilst the WNJCS identifies strategic employment land, additional employment land opportunities should be identified in the Part 2

• Additional land should be made available at Towcester, the principle town and most sustainable location for employment

• Positively worded economic development policies should relate to the provision of small rural workshops and business units
5.0 PRE SUBMISSION PREFERRED OPTIONS CONSULTATION (Regulation 18 (Sept 2017))

5.1 The Pre-submission preferred options consultation\textsuperscript{vii} was carried out between the 4 September 2017 until 12 noon on the 10 November 2017. As in the previous consultation, the consultation period was 10 weeks.

5.2 This consultation provided a preferred policy approach and the document covered the following:

- Introduction
- Spatial Portrait
- Vision and Objectives
- Building Sustainable Communities
- The Spatial Strategy – including a settlement hierarchy and revised village confines
- Housing policies and proposals
- Employment policies and proposals
- Connection policies and proposals
- Heritage policies
- Gypsy and Traveller policy
- Town centre policies
- Environmental policies
- Monitoring framework
- Proposals Map
- The Sustainability Appraisal and HRA appropriate Assessment screening

5.3 How the options were addressed in the pre-submission preferred options consultation

5.4 There were a number of changes to the plan since the options consultation to take into account some of the representations received. These are as follows:

5.5 A number of additional housing policies were added to reflect updated evidence bases. This included:

5.6 Housing policies

5.7 Housing mix: the policy on housing mix was updated to take into account evidence provided by a Housing market evidence report (June 2017) which set out the mix and type of dwellings recommended during the plan period.

5.8 Older persons and specialist housing requirements: a new policy covering the provision of older people and specialist housing accommodation was drafted
following the completion of a County study ‘Housing and Support Needs of Older People across Northamptonshire’ (March 2017), combined with the Housing Market Evidence base (2017). The new policy outlined the mechanisms that would be available to deliver the accommodation needs of older people and specialist housing provision.

5.9 **Single plot exception site:** A further policy to complement the existing rural exception site was added. This policy approach allowed for ‘qualifying people’ with access to suitable exception site land to build their own affordable home. This policy not only supported meeting affordable housing need, but also provided an additional mechanism for self-build opportunities.

5.10 **Local Objectively Assessed Needs:** a new policy was proposed that where an objectively assessed local need for housing was identified, housing development that included market housing on suitable sites outside but immediately adjoining the settlement confines could be considered.

5.11 **Settlement and Village Confines:** The consultation included a full complement of revised draft town and village confines.

5.12 **The Northampton Related Development Area (NRDA):** The West Northamptonshire Joint Core Strategy (WNJCS) sets out the housing requirement for Northampton. As Northampton is unable to meet all of its own housing need within its own boundaries the Strategy allocates some land within South Northamptonshire (SNC) and Daventry Districts (DDC) to help meet the total figure. This is known as the Northampton Related Development Area (NRDA).

5.13 A report published in 2016 identified that the delivery of housing is less than the WNJCS had envisaged and that there were insufficient sites within the NRDA that are considered to be deliverable to meet the need within the next 5 years.

5.14 There were 2 separate issues that needed to be considered in the draft plan
- The existing shortfall in the 5 year supply of housing in the NRDA, and
- The likely overall shortfall in provision of housing by the end of the plan period (2029)

5.15 The draft plan included a general policy approach to the NRDA, that that considered provided a positive yet controlled approach towards additional housing within the District to contribute towards the short term under delivery.
5.16 **Environmental policies**

5.17 The draft plan included newly drafted on environmental policies, these included:

- General rural landscape area policies
- Biodiversity and Geodiversity
- Trees Woodlands and Hedgerows
- Tree Preservation Orders and in Conservation Areas
- Protected Species
- Nene Valley Nature Improvement Area
- SSSI
- Special Landscape Areas (SLA)

5.18 A review of the Special Landscape Areas (SLA)\(^\text{viii}\) had been commissioned, which recommended that the existing SLAs should be retained and identified a number of additional areas. A policy on the existing and new SLA was included in this draft of the Local Plan Part 2.

5.19 **Employment policies and proposals**

5.20 The draft plan included general development management policies on employment and also included proposals for five new employment allocations:

- Towcester Employment 1: Land at Bell Plantation
- Towcester Employment 2: Leisure and Sports Village at Towcester racecourse
- Towcester Employment 3: Land at Woolgrowers Field
- Rural Employment 1: Employment Land at Shacks Barn, Whittlebury
- Rural Employment 2: Land at Former Furtho Pit, Old Stratford/Cosgrove

5.21 **Connection policies**

The policies included a safeguarding route for a bypass at Chipping Norton. In addition a policy on electric charged points was introduced covering by residential and business, retail, commercial or leisure developments.

5.22 **Local Green space representations**

The preferred options draft plan included a draft policy on local green space. The consultation also sought Local Green Space nominations from the public
as part of the preparation of the Local Plan. It was an important step for identifying sites considered special to local residents and communities.

5.23 **Pre-submission preferred options consultation material**
As part of this consultation a number of documents were made available for public consultation. The consultation material included:

- Pre-submission draft document for consultation
- Pre-submission draft Local Plan Part 2 – Summary document
- Proposals for revised town and village confines
- Local Green Space designation and methodology document
- Local Plan Part 2 draft pre-submission draft monitoring framework
- Housing Market Evidence base (2017)
- A review of Special Landscape areas in South Northamptonshire
- Sustainability appraisal

5.24 **Promotion of the consultation period**

- All of the information and documents were available to view on the Council’s website through the homepage/ consultation page and planning policy pages.
- Hard copies of all of the documents (including the Sustainability Appraisal, Appendices and Summary), were made available to view at the five main libraries of Towcester, Brackley, Roade, Middleton Cheney and Deanshanger.
- A poster displaying details of the consultation and the drop-in events were circulated to parish council to display on their notice boards
- Press articles were placed in publications including the SNC Review and Towcester and Brackley Advertiser
- Statutory notices were placed in appropriate places
- Publicity material was placed on social media including Facebook and on Twitter;
- A display banner was placed at the Council office reception areas, as well as Brackley library
- BBC Radio Northampton interviewed Councillor Steven Clarke on the local plan consultation on 9 Sept 2017
• A bespoke email address localplanconsultation@southnorthants.gov.uk for the Pre-submission preferred options consultation was set up to ensure a single point of email communication.

• Hard copies were also available on the South Northants Volunteer Bureau Bus which toured the rural areas

5.25 How the public consultation was carried out

5.26 Briefings sessions were held for staff, members, parish councils and the development industry. These sessions provided an opportunity to present the key proposals within the local plan part 2.

<table>
<thead>
<tr>
<th>Audience</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council staff</td>
<td>2nd September 2017</td>
</tr>
<tr>
<td>District Council members</td>
<td>19th and 20th September 2017</td>
</tr>
<tr>
<td>Parish Councils</td>
<td>19th and 20th September 2017</td>
</tr>
<tr>
<td>Development industry</td>
<td>26th September 2017</td>
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</tbody>
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5.27 Drop in events were held where interested parties could come and view the plan and speak to officers. These were held in the following locations:

<table>
<thead>
<tr>
<th>Date</th>
<th>Venue</th>
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</thead>
<tbody>
<tr>
<td>27th September 2017</td>
<td>Bugbrooke Village hall</td>
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<tr>
<td>2nd October 2017</td>
<td>Towcester; The Forum</td>
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<tr>
<td>4th October 2017</td>
<td>Brackley library</td>
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<tr>
<td>10th October 2017</td>
<td>Roade village hall</td>
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<tr>
<td>12th October 2017</td>
<td>Deanshanger community centre</td>
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5.28 The drop-in events were held so interested parties could view the consultation documents and speak to officers from the planning policy team. Officers sought to engage with those at the event, this was achieved through display boards which provided key information, and proposal maps including the proposed village confines, wildlife corridors and special landscape areas. The events were located in different parts of the district, which included the two
market towns and the larger villages to enable us to engage with a wide range of people with varying levels of interest.

5.29 Making comments on the preferred options consultation

5.30 Comments could be made using a variety of methods:

- Online consultation system (INOVEM)
- Responses could be made in writing either by post or email

5.31 Key issues arising from the preferred options consultation

5.32 Over 400 organisations and individuals responded to the consultation, see Appendix 2 for a summary of these responses. These included responses from parish councils, individuals, ward members and developers/agent and statutory consultees including neighbouring local authorities. In total 1243 responses were received.

5.33 The key issues arising from the consultation are:

- Broadly supportive responses from the statutory bodies recommending additional technical work and some policy refinements to address environmental and heritage matters
- A number of representations proposing and opposing the designation of ‘Jubilee Fields’ in Upper Boddington as a local green space
- Objection to the inclusion of the policy on Towcester Racecourse on various grounds including conformity with adopted policy T5 of the WNJCS
- A number of representations requesting the removal of land adjoining Blakesley village hall from the village confines
- A number of representations expressing support for the relocation of Towcester Football club as part of the Bell Plantation employment allocation
- Concern that there is insufficient direction from the local plan to make it clear to village that they need to grow
- A number of concerns regarding the locally objectively assessed needs (LOAN) policy approach from parish councils and developers on the grounds that it is too vague and could result in unfettered development and that it is an unsound approach to plan-making as it is not suitably worded to positively plan for boosting non-strategic housing need.
• Representations promoting both land to the north and west of Brackley for major residential development and sports Hub

• Concerns over the possible development to the south of Northampton on sites adjoining the Northampton Related Development Area particularly over highway impacts and lack of supporting infrastructure.

• A representation promoting major residential development (1,200 dwellings) on land between Wootton, Hardingstone and Preston Deanery referred to as land at South East Northampton.

• A representation promoting residential and employment development (850 dwellings) on land south of Towcester on land referred to as Burcote Green

• Some concern that the plan is pre-empting Neighbourhood Plans that are being prepared across the district.

• Various representations seeking further changes to village confines

• Various representations from and on behalf of the development industry promoting a range of sites adjacent to existing village confines.

6. LOCAL GREEN SPACE DESIGNATION CONSULTATION

6.1 Nominations for potential local green spaces were sought from the public as part of the previous public consultations on the emerging Plan. In accordance with paragraph 76 of the NPPF, only those open spaces that were put forward by the community were assessed.

6.2 There were 84 sites nominated, 29 were rejected and the remaining 55 sites were assessed against the Local Green Space methodology. Of these 32 were considerable suitable for designation as Local Green Spaces.

6.3 The Council carried out a focussed consultation on its technical assessment of those areas of land nominated to it for designation as local green space.

6.4 The consultation material was available for viewing from 24 May until the 29th June 2018.

6.5 The consultation material available for viewing included:

• Local Green Space Technical Assessment Explanatory note
• Local Green Space draft technical assessment
• Local Green Space draft individual site assessments
6.6 The consultation received 264 responses\textsuperscript{xii}. The majority of these responses related to the proposed Local Green Space designation in the parish of Boddington.

7.0 SUBMISSION DRAFT CONSULTATION (REGULATION 19)

7.1 The submission draft documents has been informed by responses made to previous rounds of consultation (regulation 18), together with discussions with stakeholders under the Duty to Cooperate, Sustainability Appraisal and technical evidence which have been prepared to inform the plan.

7.2 Consultation with residents, stakeholders and businesses carried out in accordance with the Statement of Community Involvement, has formed an important part of the preparation of the new local plan.

7.3 Key changes to the Plan

7.4 The Schedule of Changes document (2018)\textsuperscript{xiii} identified the key changes between the South Northamptonshire Local Plan Part 2 (September 2017) and the South Northamptonshire Local Plan Part 2 Draft Submission (Regulation 19) document.

7.5 Following the consultations a revised plan was presented to committee on the 25 July 2018 and 19 September 2018. A number of changes to the ‘preferred options’ plan were presented and agreed by the Planning Policy and Regeneration Scrutiny Committee, this included the addition of five (5) new policies relating to:

- EMP5: Whittlebury Park Hotel, Spa, Golf & Country Club;
- GS1: Reference to the Brackley Sports Hub;
- CON1: Towcester South- Safeguarding route for the A5 Relief Road;
- AL3: Towcester Employment Allocation- Land at Tiffield Lane, Towcester.
- NE1 Upper Nene Gravel Pits SPA

7.6 Committee also agreed to the removal of ten (10) policies. These are as follows:

- Towcester Employment 2: Leisure and Sports village at Towcester Racecourse
- Connections 2: Chipping Warden Relief Road safeguarded route
- NRDA: Residential Development Adjoining the Northamptonshire Related Development Area
− Local Objectively Assessed Needs
− Natural Environment 10: CON1: HS2, Major Development and Nationally Significant Infrastructure Projects
− Employment 6: Equine Development
− Retail: Corner shops, village shops and isolated shops
− Natural Environment 9: Development in the nature improvement area
− Retail 3: Advertisements in town centres
− Retail 2: Shopfronts

7.7 In addition, there were minor amendments to settlement confines to ensure consistency with the methodology and respond to comments received during the preferred options consultation.

7.8 Following the completion of consultation on Local Green Space (LGS), the Local Plan allocates 33 Local Green Spaces. An additional area at Syresham (Pocket Park) was included and following a reassessment of the Jubilee Field in Upper Boddington, the area was retained as a LGS in the Plan. Justification for the local green space designations can be viewed within the Local Green Space Technical Assessment (July 2018).

7.9 The Council's Planning Policy and Regeneration Scrutiny Committee considered the Proposed Submission Local Plan Part 2 and approved it for Regulation 19 consultation on the 19 September 2018.

7.10 Promotion of the consultation period

7.11 The consultation was undertaken between 4 October 2018 and 12 noon on the 16th November 2018 (6 weeks).

7.12 This consultation publicised the final version of the South Northamptonshire (Part 2) Local Plan before submission to the Planning Inspectorate, i.e. the Regulation 19 Publication stage. It was informed by previous consultations and a robust evidence base including a Sustainability Report and a Habitat Regulations Assessment.

7.12 At Regulation 19 stage, the Council were seeking views on the following three issues to be considered by the Planning Inspector.

• Whether the plan complies with the legal requirements
• Whether the legal duty to cooperate has happened, and
• Whether the plan is ‘sound’, the following criteria will be considered by the Planning Inspector:

  – Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessment development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

  – Justified – the plan should be the appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

  – Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;

  – Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

7.14 Following the Council’s approval (19 September 2018) to publish of the Regulation 19 submission draft of the South Northamptonshire Local Plan Part 2 for consultation, the Council contacted the Town and Parish Councils to inform them of the upcoming consultation. The email/letter set out the timescales for the consultation, and included details of the Parish Council’s briefing sessions, alongside the public drop-in sessions that would take place throughout the district during the consultation period.

7.15 As with the previous consultation, all consultees listed on the consultation database were informed directly by email and/or letter and were invited to respond to the consultation.

7.16 The Statement of Representation Procedure Notice and Availability of Documentsxiv provided details of how representations could be made and guidance on the areas to consider when looking at whether or not the Plan is legally compliant or ‘Sound’. The Statement of Representation Procedure Notice also recommended that respondents read the ‘Procedural Practice in the Examinations of Local Plans’xv

7.17 All of the information and documents were available to view on the Council’s website through the homepage/consultation page and planning policy pages.

7.18 The website published the following documents:

  – The proposed Submission Local Plan Part 2 and inset mapsxvi
– Summary of Part 2 Local Plan
– Sustainability Appraisal
– Proposal maps
– Confine maps
– Statement of representation procedure and availability of documents
– Representation form
– Consultation Statement
– Summary of responses to pre-submission (Autumn 2017)
– Schedule of Changes – September 2018
– Memorandum of Undertaking October 2018
– Duty to Cooperate Statement October 2018
– Pre-submission Equality Impact Assessment

• Hard copies of all of the documents (including the Sustainability Appraisal, and Appendices), were made available to view at the five main libraries of Towcester, Brackley, Roade, Middleton Cheney and Deanshanger.

• A poster advertising the consultation and the drop-in events were circulated to parish councils to display on their notice boards

• Press articles were placed in publications including the Towcester and Brackley Advertiser

• Statutory notices such as the public notice were placed in appropriate places

• Publicity material was placed on social media including Facebook and on Twitter;

• The bespoke email address localplanconsultation@southnorthants.gov.uk for the proposed submission draft was used to ensure a consistent way of communication.
7.20 **How the public consultation was carried out**

7.21 Briefings sessions were held for staff, members, parish councils and the development industry. These sessions provided an opportunity to present the key proposals within the Submission draft of the Local Plan Part 2.

<table>
<thead>
<tr>
<th>Audience</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council staff</td>
<td>21 August 2018</td>
</tr>
<tr>
<td>District Council members</td>
<td>20 August 2018</td>
</tr>
<tr>
<td>Parish Councils</td>
<td>11 October 2018</td>
</tr>
<tr>
<td></td>
<td>16 October 2018</td>
</tr>
<tr>
<td>Development industry</td>
<td>9 October 2018</td>
</tr>
</tbody>
</table>

7.22 The drop-in events were held so interested parties could view the consultation documents and speak to officers from the planning policy team. Display boards provided information on the key areas of the Plan. Proposal maps including the proposed village confines, wildlife corridors and special landscape areas were included in the display. The events were located in different parts of the district, which included the two market towns and the larger villages to enable us to engage with a wide range of people with varying levels of interest. These were held in the following locations:

<table>
<thead>
<tr>
<th>Date and Time</th>
<th>Venue</th>
</tr>
</thead>
<tbody>
<tr>
<td>15 October 2018 - 3.30-6.30</td>
<td>Brackley Town Hall</td>
</tr>
<tr>
<td>17 October 2018 – 3.30-6.30</td>
<td>Bugbrooke Community Centre</td>
</tr>
<tr>
<td>18 October 2018 – 3.30 – 6.00</td>
<td>Deanshanger Community Centre</td>
</tr>
<tr>
<td>22 October 2018 – 3.30 – 6.00</td>
<td>Roade village hall</td>
</tr>
<tr>
<td>30 October 2018 – 3.30 – 6.30</td>
<td>The Forum, Towcester</td>
</tr>
</tbody>
</table>

7.23 **Making Comments on the submission draft**

7.24 A bespoke representation form was devised based upon the Planning Inspectorate’s suggested form and guidance note to use at publication stage.
The form was divided into two: Part A for personal details of the individual/agent and; Part B representation(s) submission.

7.25 The representation form was available to complete on-line via survey monkey or as a hardcopy, which could be returned via post or email. Alternatively responses could be made in writing either by post or email.

7.26 **Key issues arising from the submission draft**

7.27 There were 218 responses to the consultation generating 358 representations. The majority of responses were sent in via survey monkey with the remainder being submitted via email or post. The Council has prepared the ‘Summary of Representations to proposed Submission Plan and Suggested response’xxvii, which should be read alongside this updated Consultation Statement. Late submissions were not accepted, there were seven late submissions at Regulation 19 stage. Therefore these representations do not form part of the ‘Summary of Representations’ document, and these respondents have been duly notified of this.

7.28 The following is intended as a summary of the principal issues raised during the consultation period.

7.29 **New Housing Allocations**

7.30 A number of respondents consider that the Local Plan Part 2 is ‘unsound’ as it does not allocate sites within the rural areas to meet its housing needs or the unmet needs of Northampton. Some respondents argued that allocations are required to ensure that the required levels of affordable housing are delivered, whilst others have indicated that due to a change in the way housing needs are to be calculated, there will be an additional housing requirement.

7.31 The Part 2 Plan is subservient to the WNJCS, which sets the overall spatial strategy for West Northamptonshire, through Policy S1. This directs development to the edge of Northampton, followed by Daventry, Brackley and Towcester and finally limited development within the rural areas.

7.32 The government’s standard methodology is likely to result in an increased housing requirement for South Northamptonshire. How additional growth will be distributed is a matter is considered to be matter for the review of the WNJCS and the Part 2 Local Plan.

7.33 The Council’s 5 year Land Supply report, set out that the Council has met and exceeded the rural housing requirement, and is on track to meet the identified requirement for Brackley and Towcester over the plan period.
7.34 Careful consideration has been given to the necessity to allocate sites to deliver affordable housing, particularly given that the proposed submission document did not take forward the Locally Objectively Assessed Needs (LOAN) policy which would have enabled development (market and affordable) to come forward in and adjacent to village where there was an identified local need. However it does not logically follow that allocations for housing will deliver the required levels of affordable housing. The Part 2 Local Plan provides an appropriate policy context for a variety of affordable housing products and tenures to be brought forward within and adjacent to settlement confines.

7.35 The allocation of sites within the rural areas, over and above the planning requirement, may also undermine the spatial strategy and pre-empt decisions that are to be properly made through the review of the WNJCS.

7.36 Northampton Related Development Area

7.37 It is recognised that housing delivery for Northampton (both within the administrative area and the SUEs allocated to meet the longer terms needs) has been slower than projected, resulting in a significant shortfall against the requirements of the WNJCS. To assist in addressing the shortfall, the Part 2 Local Plan had included a criteria-based policy to help boost the short-term supply of sites and provide additional diversity to the market.

7.38 Whilst the approach was generally supported by the development industry there were a number of substantial objections (including under the Duty to Cooperate) from the partner authorities, in addition Natural England considered that resulting development could have unintended consequences on the integrity of the Upper Nene Gravel Pits SPA. The introduction of additional criteria would effectively have rendered the policy unworkable and the number of homes that could be delivered as a result of the policy would not have made a significant contribution to addressing the shortfall. As a result, the policy was deleted from the plan and a commitment that development that can demonstrate compliance with WNJCS Policy S4 and conformity with the development plan as a whole would be supported based on their individual merits.

7.39 Some representors suggested, in the absence of a criteria based policy, allocation of specific sites to meet the needs of Northampton (NRDA) should be made. The allocation of sites either adjacent to the NRDA boundary or the rural areas is considered contrary to the spatial strategy of the WNJCS. The allocation of a site on the edge of Northampton to meet the needs of the NRDA would amount to a re-drawing of the NRDA policy line, it is considered that the re-drawing of the NRDA policy line would be beyond the scope of the Part 2 Local Plan. Further details and background around the NRDA policy
approach is set out in the NRDA technical paper and the Duty to Cooperate statement.

7.40 Settlement Hierarchy

7.41 The settlement hierarchy (Policy SS1) is key to the effective operation of the plan and the development of the revised confines for settlements. A number of comments were received on policy SS1. These relate to the following principal issues:

- Specific requests to alter confines, either to include or exclude land;
- Objections to the position of settlements within the hierarchy; and
- Objections to the division of the Secondary Service Villages into category A and B

7.42 Alterations to settlement confines have been considered on a case by case basis, it was considered that minor changes are made at Sulgrave, Hackleton, Courteenhall and Blakesley. These changes are considered to be corrections of small errors, or the alteration of alignment that only affects very modest areas of land.

7.43 Representations sought changes to the position of settlements within the hierarchy. The methodology provides clear parameters for the points attributed to services and facilities. Whist these representations have highlighted changes to services and facilities in some settlements, the scoring has not resulted in any settlements moving category.

7.44 Due to the character of South Northamptonshire, the majority of the villages are categorised as ‘Secondary Service’ villages. To ensure that development was directed sustainably across the district, these villages have been divided into Secondary A and B. This ensures the effective operation of different policies, reflecting settlement needs.

7.45 Some representations have argued that an approach, which divides the secondary service villages, is not consistent with WNJCS Policy R1. The Part 2 Local Plan gives reasons for this split as it better reflects the variation in levels of services and facilities. Further details and background around the Settlement hierarchy policy approach is set out in the Settlement hierarchy technical paper.

7.46 Optional Technical Standards
7.47 Policy LH10 requires all sites should contribute towards meeting the needs for wheelchair accessible dwellings. A number of representors have stated that this requirement is contrary to paragraph 56-009 of the Government’s Planning Practice which states, ‘Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling’.

7.48 Officers have considered the potential conflict with guidance and note that, as a matter of law it is possible to depart from policy and guidance. It is considered that there is evidence that such standards are required to meet the needs of the population of South Northamptonshire, as evidenced by the Strategic Housing Market update (2017).

7.49 Towcester Employment Allocations

7.50 The Part 2 Local Plan contains three employment allocations in the market town of Towcester. Within two of these policies financial contributions have been included to support the provision of a football club. The agent of the site AL2 (Woolgrowers Field) has submitted an objection to the financial contribution being sought towards the football club.

7.51 The reason for including this in the Plan is to assist in the delivery of new football facilities on the Bell Plantation (Policy AL1). It is considered equitable and reasonable that the neighbouring employment allocations in the Towcester area contribute towards the establishment of this important recreational and community facility. The objection considers that there is no reason why developing the site for the proposed employment use means that it should contribute towards sport pitch provision in Towcester as the site is accessed and can be developed independently of the Bell Plantation.

7.52 The objection cites national planning policy that states that where charges are sought, the local planning authority must ensure that the obligation meets the relevant tests for planning obligations in that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

7.53 A number of representations have been received that question the need for any further employment allocations at Towcester and suggest that the Council failed to undertake adequate consultation on the Plan in this regard. The Consultation Statement confirms that consultation was carried out in accordance with Regulations.

7.54 Local Green Space – Jubilee Fields, Boddington
7.55 A large number of representations were made regarding the proposed designation of Jubilee Fields, Upper Boddington as a Local Green Space (LGS), with a large majority supporting the designation.

7.56 Actions taken / key changes

7.57 Some representations have suggested minor changes to policy wording, supporting text and some maps of the Local Plan, these have been incorporated into a Schedule of minor modifications. Other representations have raised perceived matters of soundness, as set out in section 7.26-7.55 of this document.

7.58 Four topic papers have been prepared, these cover the Settlement Hierarchy, Housing policies, the Northampton Related Development Area and Employment Allocations, these help to clarify and support the approach taken in the Plan.

8 CONCLUSION

8.1 The development of the Part 2 Local Plan has been extensive and thorough. It has been developed with reference to a proportionate evidence base, and there has been four stages of public consultation with residents and stakeholders, as detailed within this Consultation Statement. Whilst changes to the plan were made between November 2017 and the submission version (October 2018) these have been developed to ensure the document meet the relevant tests of soundness and responds to changes in the evidence base and national policy context. The development of the plan needs to be considered in the context of the West Northamptonshire Joint Core Strategy (WNJCS) which forms the strategic Part 1 Local Plan.

8.2 The representations received will be considered by the appointed planning inspector as part of the Local Plan examination process. Issues raised through the consultation may be responded to and discussed at the examination hearings.

8.3 The timetable for examination process and any potential examination hearings will be determined largely by the planning inspector, in conjunction with the programme officer.


South Northamptonshire Council Call for Site form available from: https://www.southnorthants.gov.uk/downloads/file/315/local-plan-call-for-sites-form


A Review of Special Landscape Areas in South Northamptonshire is available from: https://southnorthants.gov.uk/downloads/download/485/landscape-evidence


Local Green Space draft individual site assessment available from: https://www.southnorthants.gov.uk/downloads/download/614/local-green-space-consultation


Procedural Practice in the Examination of Local Plans available from:  

South Northamptonshire Part 2 Local Plan Submission Draft available from:  

South Northamptonshire Part 2 Local Plan – Summary of Part 2 Local Plan available from:  

South Northamptonshire Sustainability Appraisal available from:  

South Northamptonshire Part 2 Local Plan Proposals Map available from:  

South Northamptonshire Confine Maps available from:  

South Northamptonshire Representation Form available from:  

South Northamptonshire Draft Consultation Statement available from:  

South Northamptonshire Summary of Responses to Pre-Submission available from:  

South Northamptonshire Memorandum of Understanding (Oct 2018) available from:  

South Northamptonshire Duty to Cooperate (Oct 2018) available from:  

South Northamptonshire Pre Submission Equality Impact Assessment available from:  

South Northamptonshire Summary of Representations to Proposed Submission Plan and Suggested Response available from:  

South Northamptonshire Schedule of Modifications available from:  