AECOM

North Northamptonshire Joint Planning Unit

Submission North Northamptonshire Joint Core Strategy

Sustainability Appraisal









SA Report Non Technical Summary

June 2015

1. Background

Sustainability Appraisal is a process for considering and communicating the likely effects of plans, with a view to avoiding and mitigating negative effects and maximising the positives. SA of the Joint Core Strategy (JCS) is a legal requirement stemming from the EU 'Strategic Environmental Assessment' (SEA) Directive.

This report presents a brief summary of the SA process that has been undertaken alongside the development of the North Northamptonshire Joint Core Strategy.

The different stages of SA that have been undertaken so far are as follows:

- **Scoping** – This involved collecting information about the environment to ensure that the SA is focused upon the issues most relevant to the Joint Core Strategy.

  An initial SA Scoping Report was published in February 2009, which was updated and then published again in July 2010. The final SA Scoping Report was consulted upon and then published in September 2011. The SA scope was reviewed again in November 2014 to ensure that the appraisal of the emerging JCS remained focused on the most relevant sustainability issues.

- **Appraising alternative strategies –** This is a critical stage in the SA process, which requires an assessment of different approaches to achieving the objectives of the Joint Core Strategy.

  As an interim plan-making/SA step, reasonable alternatives were considered for the following plan issues:

  - Housing growth and distribution;
  - Employment growth and distribution;
  - Strategic site options;
  - Strategic locations at Rushden and Deenthorpe; and
  - Core policy options.

- **Appraisal of the Joint Core Strategy -** The SA report published at this stage documents the appraisal of the Submission version of the North Northamptonshire JCS.

2. What are the key sustainability issues in North Northamptonshire?

The Scoping Stage of the SA involved collecting information about the environmental, economic and social 'baseline' throughout North Northamptonshire. It also involved a review of relevant plans, programmes and policies at an international, national, regional and local level. This is to identify the relevant policy context, including any environmental protection objectives.

By collecting this information, a list of key sustainability issues was established. These issues help to focus the SA to ensure that it is focused on the most relevant factors. The key issues for North Northamptonshire are listed in the following tables.

Social progress which recognises the needs of everyone

Accessibility

- Strategic location and integrated transport links.
- The challenge of meeting modal shift targets.
- New passenger rail service/ station at Corby.
- A number of small towns each with a separate identity.
- No one dominant centre.
- Role of large rural hinterland and its villages.

Housing

- Need for affordable housing, including gypsy and traveller accommodation.
- Viability of achieving objectively assessed housing need targets.
- There is a need to support the viability of the rural economy.
- Delivering household growth in current economic climate.
- Growth in one person households.
- Live-work units in rural areas to sustain rural communities and reduce the need to travel.
- Need for rural housing with a range of house types and sizes.

Skills

- No university provision within North Northamptonshire.
- Out-migration to surrounding competitor areas.
- The need to increase the offer for further and higher education.
- Capacity of schools.
- Skills and qualifications shortage.
- Provision of childcare and early year's provision for sustainable development.

Crime

- Rates of crime lower than the national and county average.
- Use planning (including providing relevant infrastructure) and design to reduce opportunities for crime and the fear of crime and anti-social behaviour.
- Rates of crime are declining across North Northamptonshire.
- Crime and fear of crime have been identified as factors which influence the levels of both health and social inclusion of local populations.
- Crime can be a cause of economic decline if not adequately addressed.

Health

- Reliance on Kettering General Hospital.
- High rates of teenage pregnancies in Corby and Wellingborough.
- Inequalities in health, linked to social exclusion.
- Inactive lifestyles of population of Corby and Kettering.
- Trend towards home based care; design of developments to accommodate this.

Communities

- Pockets of deprivation in growth towns.
- Corby contains the most deprived wards in the County.
- Rural deprivation linked to access to services and facilities.
- Need to plan for the needs of different ethnic groups.
- Population growth above national and regional averages.
- Increasing elderly population.

Effective protection of the environment

Heritage

- There is often poor interpretation of heritage sites and monuments.
- Aspects of more recent heritage are often overlooked or undervalued.
- The vulnerability of the historic environment as a finite resource to change.
- The capacity of historic settlements to accommodate significant development without damaging their historic character.
- Potential value of heritage assets to tourism opportunities.
- The protection and enhancement of cultural heritage.

Landscape

- The quality and distinctiveness of landscapes has been eroded by some modern development.
- There are opportunities to improve the tourism offer, and the wider benefits of valued landscapes in terms of the image of the area and the health and wellbeing opportunities.
- Value of landscape for the image of the area and attractiveness to new investment.
- The ability of the landscape to provide a tranquil setting and 'dark sky' at night.
- Limited biodiversity resource.

Biodiversity

- Protection of key wildlife sites remains a priority.
- Lack of up-to-date data relating to all County Wildlife Sites.
- International designation of an SPA in the Nene Valley.
- Fragmentation of habitats and loss of ancient woodland.
- The need to create new habitats (particularly to reduce fragmentation) to contribute to linkages between existing habitats.
- Opportunity for creation and enhancement of habitats through both mineral site restoration and new development proposed by the growth agenda.
- Opportunity to contribute to positive management of existing Local Wildlife sites.
- Importance of maintaining ancient woodland areas.

Climate change

- Lack of data.
- The opportunity for renewable energy schemes.
- The need to reduce emissions particularly related to traffic growth.
- The need to adapt buildings to natural processes and climate change.
- Energy demand from existing buildings.
- Gap between demand and provision, particularly in renewable provision.

Prudent use of natural resources

Air quality

- Some pollutants may increase to unacceptable levels as a result of road traffic growth.

Soil and land

- Vernacular architecture using local materials (banded ironstone, limestone and Collyweston slate) is an important aspect of historic character and informs local distinctiveness.
- High Quality Agricultural Land around Wellingborough and Kettering.
- Limited supply of previously developed land (brownfield) land in some areas.
- Need to safeguard and enhance soils.

Water and flooding

- Control of run off and addressing contamination issues.
- Significant investment required in the management of run-off and flood risk and upgrading of waste water treatment capacity and sewerage networks.

Minerals and waste

- Managing waste generated by growth in a sustainable manner.
- Delivering the minerals required to meet apportionments in appropriate locations.

Maintenance of economic growth and employment

Town centres

- Tourism remains peripheral to the economy.
- Network of centres meeting day to day needs of residents.
- Individual town centres in North Northamptonshire are relatively weak compared to competing centres.
- Requirement to strengthen and enhance all the Town Centres.
- Access to facilities from rural areas, new development could provide an opportunity to support the rural economy.
- A concentration of cultural facilities and tourism activities can act as a magnet for visitors.
- Concentrating tourism development within town centres provides the potential to support wider regeneration and sustainable development objectives. Interdependency of cultural and tourism services.
- New facilities being multifunctional and centrally located with good access.
- Linking in tourism to town centre regeneration schemes.
- Role of smaller towns.

Economy

- Uncertainty over impact of recession on delivery of growth plans.
- Need for investment to maintain development activity and ensure that conditions are right for growth as the market recovers.
- Importance of manufacturing and storage and distribution.
- Opportunities for growth in knowledge based industries.
- Opportunities as part of Motorsport Valley.
- Limited office space with slow take up.
- Competition from and dominance of Northampton for office space.
- Diversification of the economy.

A SA framework consisting of SA objectives and assessment criteria was then developed using these key issues as a starting point. The effects of the JCS and any reasonable alternatives were assessed against this SA framework.

The tables below set out the SA Objectives that have been established for this Sustainability Appraisal

SA Topic	SA Objectives
Social progress which recognises the needs of everyone	
Accessibility	To improve accessibility and transport links from residential areas to key services, facilities and employment areas and enhance access to natural environment and recreational opportunities.
Housing	Ensure that new housing provided meets the housing needs of the area provide affordable and decent housing for all.
Health	Improve overall levels of physical and mental health; reduce the disparities between different groups and different areas.
Crime	To improve community safety, reduce the incidences of crime and the fear of crime and anti-social behaviour – a safe place to live.
Community	Value and nurture a sense of belonging in a cohesive community whilst respecting diversity
Skills	To improve overall levels of education and skills.
Liveability	To create healthy, clean and pleasant environments for people to enjoy living, working and recreating in and to protect and enhance residential amenity.
Effective protection of the environment	
Biodiversity	To protect, conserve and enhance biodiversity, geodiversity, wildlife habitats and green infrastructure to achieve a net gain and to avoid habitat fragmentation.
Landscape	To protect and enhance the quality, character and local distinctiveness of the natural and cultural landscape and the built environment.
Cultural Heritage	Protect and enhance sites, features and areas of historic, archaeological, architectural and artistic interest and their settings.
Climate Change	Reduce the emissions of greenhouse gases and impact of climate change (adaptation).
Prudent Use of natural resources	
Air	To maintain or improve local air quality
Water	Maintain or improve the quality of ground and surface water resources and minimise the demand for water
Natural Hazard	Reduce the impact of flooding and avoid additional risk
Soil and Land	Ensure the efficient use of land and maintain the resource of productive soil
Minerals	Ensure the efficient use of minerals and primary resources

Energy Use	To mitigate climate change by minimising carbon based energy usage by increasing energy efficiency and to develop North Northamptonshire's renewable energy resource, reducing dependency on non-renewable resources.
Waste	To reduce waste arisings and increase reuse, recycling and composting
Maintenance of high and stable levels of economic growth and employment	
Employment	Maintain and enhance employment opportunities and to reduce the disparities arising from unequal access to jobs
Wealth Creation	Retain and enhance the factors which are conducive to wealth creation, including personal creativity, infrastructure and the local strengths and qualities that are attractive to visitors and investors
Town Centres	Protect and enhance the vitality and viability of town centres and market towns

3. Appraisal of reasonable alternatives

The Regulations[1] state that an SA Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme'.

The most critical issue to address in terms of reasonable alternatives is the level and distribution of housing and employment growth.

Spatial Alternatives

Five spatial alternatives have been assessed as part of the SA process; which were focused on the roles of Corby, Kettering, Wellingborough and Rushden relative to each other, the rural areas and to nearby centres, in particular Northampton.

The alternatives considered along with an indication of what each entails, is set out below:

A. *Core Strategy Plus* – This alternative relies upon the existing consented schemes in Wellingborough, Corby and Kettering coming forward in the longer term. It is based upon the adopted Core Strategy but with a greater role for Rushden, and more detail for rural areas and small towns.

B. *Twin poles* – This alternative relies on existing consented schemes in Wellingborough, Corby and Kettering coming forward. Kettering would be expected to deliver an additional 800+ houses. It allows for additional employment growth in Wellingborough to reduce the amount of out commuting to Northampton.

C. *Northern focus* – This alternative seeks an additional 5000 dwellings to be identified and delivered above the existing commitments in Corby. Kettering relies on the delivery of consented schemes. As a northern focus there is less pressure for development in Wellingborough, with less growth coming forward than allocated in the adopted core strategy.

D. *Northampton focus* – This alternative is based on Northampton playing a stronger role as the county town and major regional centre, providing jobs and higher order facilities for many residents in North Northamptonshire.

[1] Environmental Assessment of Plans and Programmes Regulations 2004

E. *Dispersal* – A dispersal approach was also tested at a later stage in the plan-making process. (This was originally deemed unreasonable as it would not adhere to the spatial strategy stipulated in the Regional Spatial Strategy (which was since revoked). The Dispersal Option is based on the pattern of development that would result if the objectively assessed need for housing in the HMA is distributed across most of the area based on the resident population of places at the 2011 census. The exceptions to this are at Higham Ferrers, where development is physically constrained, and the Growth Towns, where it is assumed that development will continue at past rates due to the SUEs not delivering housing at the rate previously envisaged. For these towns, the surplus housing is redistributed to other settlements and rural areas within each district in proportion to their 2011 populations.

Discussion of the SA findings

Although alternative E (Dispersed development) may present very attractive opportunities for housing development for the development industry, it is clearly the least sustainable alternative when considered against the full range of sustainability factors. This scenario would be likely to have a significant negative effect on sensitive biodiversity habitats, landscapes and agricultural land. It would also locate significant numbers of people in areas that have poor accessibility to services and jobs. Whilst this could help to support the local economies where growth occurred, it is unlikely that the critical mass would be created to support enhanced connectivity and higher order public services. This could also place a significant burden on infrastructure capacity, without providing the critical mass of development to support new infrastructure investment. This is considered to be a significant negative effect.

The SA highlights that Options A-D are difficult to distinguish in some ways as each involves the same amount of housing and employment growth (*apart from Alternative D for employment*), albeit distributed differently.

Essentially, each option would have positive effects on housing delivery and the health and wellbeing of communities, but the effects would be more pronounced in different areas under the various alternatives.

It is considered that alternatives A and B perhaps spread the benefits (and potential adverse effects) of development more evenly compared to alternatives C and D, and are therefore slightly more balanced in terms of supporting population and employment growth across the County in a way that benefits communities.

The Joint Planning Unit's preferred approach to housing growth and distribution is set out predominantly in Policies 28 and 29 of the JCS, which seek to deliver the objectively assessed housing need through an urban-focused strategy. The preferred option arising from the assessment of reasonable alternatives was a hybrid option, with the overall approach being most closely aligned to the 'Core Strategy Plus' option, but the distribution of housing weighted to the northern area as in the 'Northern Focus' option and greater self-reliance for employment in the southern area as in the 'Twin Poles' option.

In the context of the SA of the reasonable alternatives, the preferred approach is considered to be appropriate and justifiable.

Site appraisal process

The JCS allocates land of a strategic scale for housing and employment purposes in order to increase the certainty of the delivery of the strategic objectives of the Plan over the period from 2011 to 2031.

A series of shortlisted sites were assessed using a more detailed site appraisal methodology that was linked to the Sustainability Appraisal Framework.

4. Appraising the Submission Joint Core Strategy

A robust sustainability appraisal of the North Northamptonshire Joint Core Strategy (*Pre-Submission Version*) was undertaken by independent consultants AECOM (Formerly URS).

This appraisal identified and evaluated the '*likely significant effects'* of the Joint Core Strategy viewed 'as a whole' and the findings were presented in full within the SA Report.

Following consultation on the Pre-Submission Joint Core Strategy (and the SA Report) a number of focused changes were made to the JCS. The SA Report has been updated to reflect these focused changes.

In the main, the focused changes have led to further positive effects, but these are not considered to be substantial enough to influence the findings within the SA (i.e. these changes did not cause any significant effects).

The list below summarises the key effects that the focused changes would have.

- Focused changes to the Joint Core Strategy strengthen Policy 3 by making provision for Part 2 Local Plans to identify further areas where tranquillity should be preserved. This would have positive implications for landscape character, and the reduction of noise and air pollution. At this stage, it is unclear what areas these would be, so the effects are not determined to be significant

- Policy 8 strengthened with regards to community safety by stating that development should have regard to the principles of 'Secured by Design'. This can have knock on positive effects on health and wellbeing.

- Focused changes to Policy 14 strengthen this policy with regards to the protection of environmental assets. This should help to ensure that development at Deenethorpe respects local heritage and the character of the built environment. Whilst these effects are positive, they are not considered to be significant, as protection and enhancement for heritage is already provided for through Policy 2.

- Focused changes to Policy 19 require that, where appropriate, project level Habitat Regulations Assessments are undertaken, which should help to ensure that potential negative effects on wildlife are mitigated.

- Policy 26 will seek to ensure that proposals for Solar Farms avoid the best and most versatile agricultural land. This would contribute to a further positive effect soil and land by protecting soil resources from such development. As there is considerable land within North Northamptonshire that falls within this category of land, this policy clause could have a positive effect on the baseline for soil, but could be negative in terms of supporting renewable energy generation.

- The focused changes have also removed criterion a) from Policy 26, which required developers to demonstrate that the technology selected is 'the most appropriate'. The removal of this clause will allow for a more flexible approach and will encourage developers to bring forward a variety of schemes which could help to achieve carbon emissions reductions. This change implements a recommendation made by the SA in the pre-submission SA Report.

- Focused changes to Policy 27 will help to strengthen its influence on development in the Rockingham Motor Enterprise Area. By making explicit reference to Weldon Lodge and Kirby Hall, these assets are likely to be taken into account in new development proposals. The effects are not considered to be significant, as effects on heritage need to be considered anyway to satisfy the NPPF and are provided through Policy 2.

The tables below summarise the overall effects of the latest version of the JCS (i.e. the Submission version). This takes account of all the policies in the plan, including the focused changes.

It is important to note that draft policies have been appraised as the Plan has been developing and the findings have been taken into account as the policies have been finaslised.

Social progress which meets the needs of everyone

On balance, the Joint Core Strategy is considered likely to have a positive effect on the health and wellbeing of communities by improving access to housing and employment and seeking to diversify the economy (which could help to improve access to better paid jobs). Coupled with policies that seek to improve accessibility and environmental quality, it is considered that **significant positive effects** would be likely on the baseline position with regards to health and the provision of housing.

Aside from improved access to housing and employment, the Joint Core Strategy would also contribute to equitable and sustainable growth by helping to create safe places, accessible and well-connected neighbourhoods.

The SUEs in particular present the opportunity to create well-connected and well-served communities led by 'Garden City' principles and with the involvement of local communities.

Development of housing, employment sites and infrastructure could have localised effects on specific communities by affecting amenity, potentially affecting air quality (in the short term at least), and through a perceived loss of community. However, the policies within the Joint Core Strategy ought to ensure that these effects are mitigated. It is also important to remember that housing growth and development would still occur anyway in the absence of the revised Joint Core Strategy and in most cases development proposes enhancements to the environment and social infrastructure. Therefore, these effects are not considered to be significant.

Effective protection of the environment

The Joint Core Strategy generally directs growth away from areas of sensitive landscape and biodiversity value such as parts of the Rockingham Forest. However, development at the SUEs and around the main towns has the potential to have localised adverse effects on biodiversity and landscape character. This could present particular issues in towns that are within close proximity to the Nene Valley Gravel Pits SPA.

Having said this, the Joint Core Strategy seeks to protect and enhance green infrastructure, which should mitigate these effects. The JCS also includes policies that will help to achieve a net increase in green infrastructure, which would include an enhancement in the quality, connectivity and quantity of habitats such as woodland. This is considered likely to have a **significant positive effect** on the baseline with regards to biodiversity and landscape.

The JCS could have some localised adverse effects on heritage assets due to the development of housing, employment and infrastructure. However, there are protective policies that are considered adequate to mitigate these effects. Due to the distribution of development, the setting of heritage features should be better protected in the smaller towns and villages, but there may be greater potential for cumulative effects on cultural heritage for the larger towns. On balance a neutral effect has been predicted.

The JCS incorporates a series of core policies that are likely to have a generally positive effect on air quality by promoting environmental protection (Policy 4), enhancement of green infrastructure and a modal shift towards more sustainable modes of travel such as walking and cycling (Policies 8 and 10).

Prudent use of natural resources

Housing and employment developments (and supporting infrastructure) resulting from the spatial policies have the potential to cumulatively exacerbate existing water capacity and service issues in the county; as well as having localised effects on water quality. However, a number of policies in the JCS would help to mitigate potential adverse effects by seeking to ensure high quality development and protect environmental assets. In particular, Policy 9 specifies a maximum limit of water usage for all residential developments which recognises the classification of North Northamptonshire as an area of water stress. The JCS also seeks to achieve a net gain in green and blue infrastructure, which would help to mitigate the effects of new development

The spatial approach is generally positive in terms of flood risk as most Sustainable Urban Extension sites identified are located outside of medium and high flood zones. Policy 5 also seeks to reduce flood risk and recognises that local studies might indicate where developments should meet a higher annual probability standard of flood protection. Policy 4 will also have knock on effects on the adaptability of environments to climate change by seeking to enhance the ecological network in the Nene Valley Nature Improvement Area. Together these policies are likely to have a **significant positive effect** on flood risk.

Although there will be the loss of some agricultural land, the spatial strategy is generally positive for soil and land. It directs development away from the best and most versatile agricultural land by seeking to limit development in rural areas and by seeking to prioritise the re-use of previously developed land and buildings (where suitable). On balance, the effects of the JCS are considered to be neutral in this respect.

By promoting housing and economic development, the spatial strategy will inherently increase energy use. However, it is important to note that employment and housing growth would be expected anyway. Therefore, these effects are not considered to be significant. The core policies seeking to ensure high quality development will also help mitigate this effect.

Furthermore, the spatial strategy provides opportunities to minimise energy use by seeking to enhance and give priority to sustainable means of transport. Policy 22 also recognises the Renewable and Low Carbon Energy and Green Technologies as a priority sector for economic growth, and Policy 26 identifies an area of opportunity for further development of an Energy Park focused on developing renewable energy technologies. Together these policies are likely to have a **significant positive effect** on energy use.

Maintenance of economic growth and employment

The JCS identifies the need to deliver a minimum net increase of 31,100 jobs throughout North Northamptonshire (Policy 22) in accessible locations. There are aspirations to secure high quality employment sectors, consolidate and strengthen the role of the logistics sector and to diversify the rural economy.

Delivery of these jobs (in combination with jobs created through housing development and tourism) would have a **significant positive effect** on the baseline by enhancing employment opportunities and self-reliance throughout North Northamptonshire.

Core policies in the JCS should help to create more attractive places to work, live and visit, by seeking to enhance green infrastructure, secure high quality design and improve connectivity. The strategy will also help to maintain the role, and viability of town, district and local centres; as well as supporting the delivery of strategic infrastructure to support major employment housing, retail and leisure development. These factors should further contribute to attracting investment into the area.

5. Next steps

The Joint Core Strategy was published' for consultation so that final representations could be made. A series of 'focused changes' have since been made to the Joint Core Strategy, and the implications of these changes have been reflected in the updated SA Report as necessary.

Following consultation on these focused changes, the Joint Core Strategy will be 'Submitted' for consideration by an Independent Planning Inspector at Examination. The Inspector will then judge whether or not the Plan is 'sound'. The SA Report will be 'Submitted' alongside the Joint Core Strategy.

Assuming that the Inspector does not request that further work be undertaken in order to achieve soundness, it is expected that the Plan will be formally adopted in early 2016.

Should the Inspector consider it necessary for modifications to be made to the Plan to make it 'sound', it may be necessary to undertake updates to the SA to ensure that any changes do not have a significant effect upon the findings.

At the time of adoption an SA 'Statement' must be published that sets out (amongst other things):

- How the SA findings and the views of consultees are reflected in the adopted Plan; *and*
- Measures decided concerning **monitoring**.