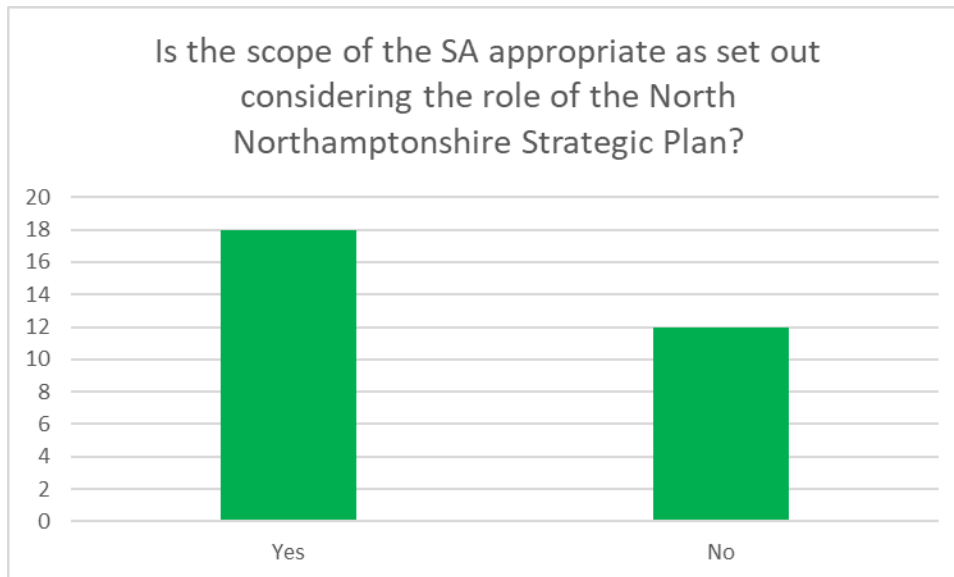


PPEAP 14th December 2022 Item 5 Appendix C North Northamptonshire SA Scoping Report Response Summary

Scope of the SA

Question 39. Is the scope of the SA appropriate as set out considering the role of the North Northamptonshire Strategic Plan?



- 18 respondents said 'Yes'.
- 12 respondents said 'No'.

- 39.1 Respondents who did not consider the scope of the SA to be appropriate set out a number of reasons why and suggested ways in which the scope could be broadened.
- 39.2 The Environment Agency set out the importance of green and blue infrastructure and the role it plays in reducing inequalities and improving health and wellbeing. They also set out that a natural capital approach should be adopted in relation to all aspects of plan, particularly climate change, biodiversity and air quality. On the theme of climate change they also noted that it should be recognised that areas not currently at risk of flooding may be at risk in the future.
- 39.3 Another respondent noted that there was a lack of reference to design quality of the built environment or architecture.
- 39.4 IM Properties supported much of the scope of the SA. However, they expressed some concerns on how the document addressed jobs growth and targets, stating that a simple jobs target does not take into account the range and skill level of jobs. They suggested that a more detailed approach is required to ensure that the needs of individual sectors are met in terms of the

quantity of employment land required, the location of employment land and the overall number of jobs.

39.5 IM Properties also expressed concerns on how ‘managing the demand and growth of logistics in a sustainable manner’ is listed as a key sustainability issue in the SA Scoping Report and how this portrays the sector in a negative light. It was suggested that the Strategic Plan should plan positively for logistics growth recognising the strengths in North Northamptonshire whilst ensuring any growth remains sustainable.

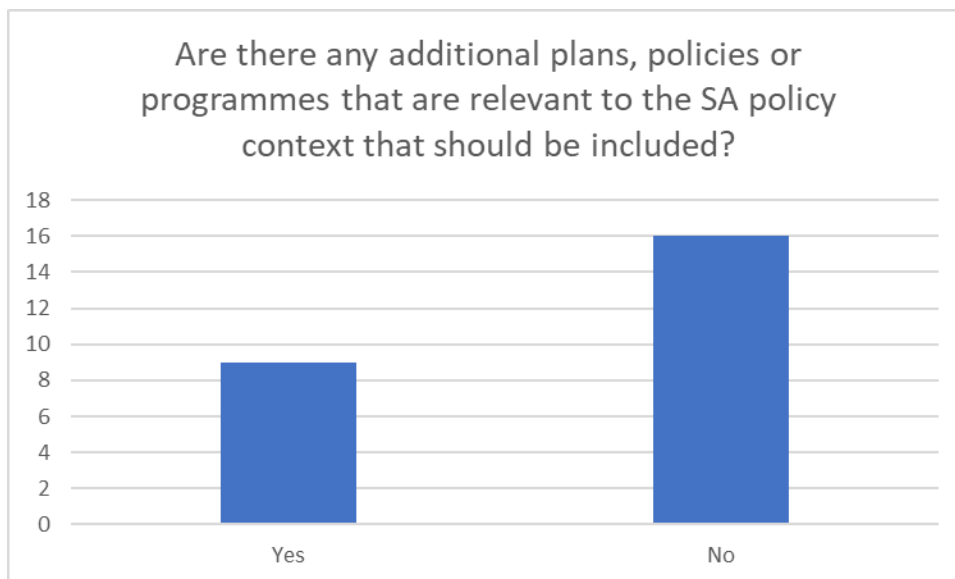
39.6 STAUNCH commented on the document as a whole and the consultation process, stating that evidence and arguments are not always clear, and the process needs to be more transparent if communities are to be more involved in the shaping of their places. They stated that the SA Scoping Report talks about ‘reasonable alternatives’ when choosing places for development and this should be given much more prominence in the planning process.

Officer response

39.7 Overall, the responses were supportive of the scope of the SA. The issues raised in responses will inform the development of the SA to ensure that it is as robust as possible and identifies and responds to relevant issues.

Additional plans, policies or programmes

Question 40. Are there any additional plans, policies or programmes that are relevant to the SA policy context that should be included (Appendix 1)?



- 9 respondents said ‘Yes’.
- 16 respondents said ‘No’.

- 40.1 Most of the nine respondents who answered 'yes' to this consultation question also put forward suggested additional plans, policies or programmes in their response. These are as follows:
- 40.2 The Environment Agency suggested the inclusion of the following:
- Land Contamination Risk Management
 - Contaminated Land Regulations 2006 (mentioned in SA text but not Appendix)
 - Part 2A Statutory Guidance: Contaminated land statutory guidance ((mentioned in SA text but not Appendix)
 - Oxford-Cambridge Environmental Principles (mentioned in SA text but not Appendix)
 - The State of the Environment: Health, People and the Environment (2020)
- 40.3 IM Properties noted that a number of European Union directives included are no longer considered to be appropriate now the UK has left the EU. They did however suggest that the Economic Recovery for the South East Midlands (2021) document produced by SEMLEP should be included.
- 40.4 St Modwen Logistics suggested that references to North Northamptonshire's Part 2 Local Plans should be removed as they state that they will no longer be up to date when the JCS is replaced and thus should not be used to inform the North Northamptonshire Strategic Plan. St Modwen also highlighted the deficiency in sectoral employment evidence base, namely the logistics sector and notes other areas where such work has been undertaken.
- 40.5 St Modwen also stated that the policy review section should also reflect and reference the positive support the current development plan has for logistics, through Policy 24 of the JCS. They also noted that the policy context section provided limited context on transport issues relevant to North Northamptonshire and that more recognition should be given to transport policy and linkages between transport and investment strategies and the planning for the specific locational requirements of different sectors.

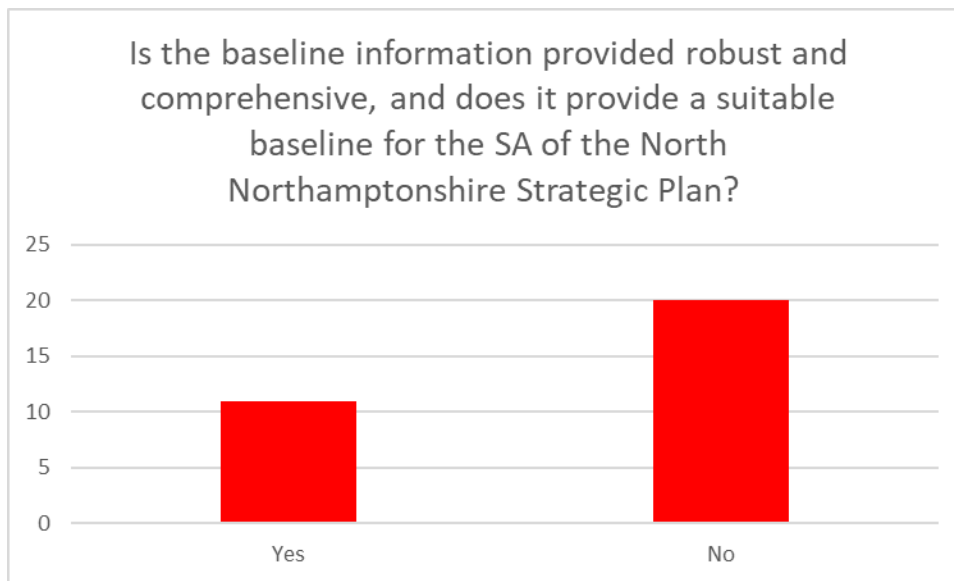
Officer response

- 40.6 Overall, most respondents did not think that there needed to be any additional plans, policies or programmes that should be referenced within the SA Scoping Report. Only the Environment Agency, St Modwen and IM Properties suggested additional documents/regulations/guidance that ought to be mentioned or referenced in Appendix 1 of the report and these are all reasonable suggestions that could be included in the SA as it is developed. The suggested removal of certain documents will need to be considered, taking account the national policy context. The Part 2 Local Plans will remain extant when the Strategic Plan is adopted and should be referenced. In relation to St Modwen's point on the deficiency of logistics sector evidence, a

Logistics Study has been prepared for the SEMLEP area which will inform the Strategic Plan alongside other local evidence such as the Housing and Economic Needs Assessment (HENA). The approach to logistics in the Strategic Plan is discussed in the Scope and Issues responses, specifically Question 22.

Baseline information

Question 41. Is the baseline information provided robust and comprehensive, and does it provide a suitable baseline for the SA of the North Northamptonshire Strategic Plan?



- 11 respondents said 'Yes'.
- 20 respondents said 'No'.

- 41.1 There are some parallels between the answers given to this question and question 39 on the appropriateness of the scope of the SA Scoping Report.
- 41.2 Of those that said answered 'no', many did not explain why they thought this, however from those that did, the following was noted:
- 41.3 One respondent accepted that the document was robust in every sector other than that of the built environment but did not suggest any specific changes.
- 41.4 Some respondents pointed out that some of the baseline information is out of date and should be revised, namely information that has used Census data from 2011 and that it would be prudent to update this to the soon to be released 2021 data.
- 41.5 On the employment baseline, IM Properties expressed concerns that none of the data sources presented provide an indication of the demand for employment land going forward.

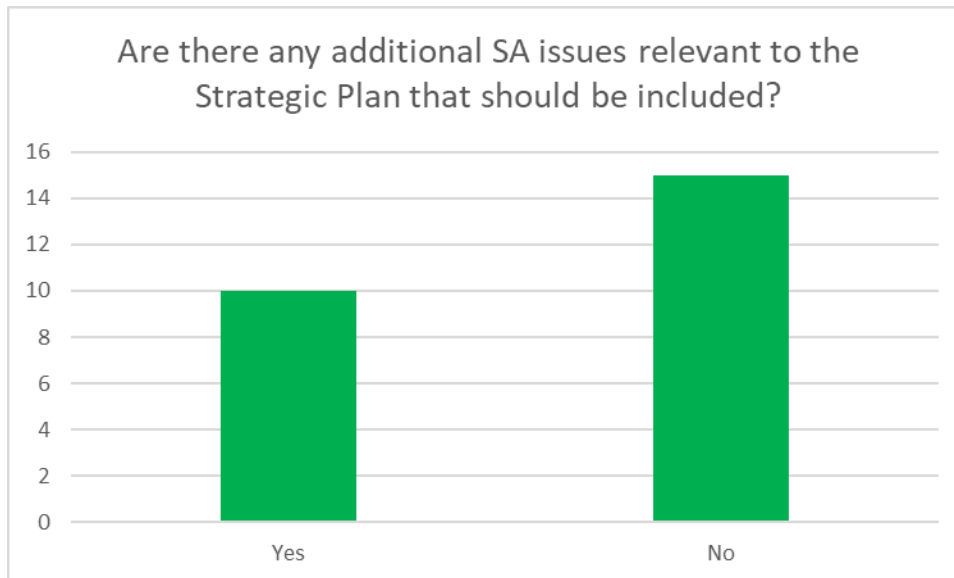
- 41.6 Prologis expressed similar concerns to the above in that they considered the approach to calculating employment land as flawed and not fully aligned with the Planning Practice guidance. They recommended that the Council undertakes an updated and detailed assessment of employment land need as part of the evidence base for the Strategic Plan.
- 41.7 St Modwen Logistics highlighted that there is an imbalance between employment land supply in the west of North Northamptonshire compared to the east and that this should be reflected in future iterations of the SA. They also suggested greater recognition of key transport routes running through North Northamptonshire within the document regarding their economic role and importance.
- 41.8 North Northamptonshire Council's Education service responded in regard to the evidence base relating to Education. They highlighted that the evidence base used in the SA Scoping Report to show pupil yield will need to be reviewed and updated and that consideration needs to be given to early years, sixth form and SEND provision. Any new yield forecasts will need to be consistent with new DfE guidance.

Officer response

- 41.9 Overall, despite most of those that responded to this question considering that the baseline information in the SA Scoping Report to not be robust and comprehensive, there were not a lot of suggestions by way of improving the document.
- 41.10 Concerns that some of the baseline information is out of date (e.g. 2011 Census data) is recognised and there will be scope to update some of the relevant information to the 2021 baseline when this data is fully released and understood. This is also the case for the data surrounding pupil yield which can be updated once the information is available.
- 41.11 Some of the concerns relating to employment issues surrounding employment land availability and demand should be addressed by evidence being prepared for the Strategic Plan, including the development of the HENA and other employment related studies such as the SEMLEP Logistics Study.

Additional SA issues

Question 42. Are there any additional SA issues relevant to the Strategic Plan that should be included?



- 10 respondents said 'Yes'.
- 15 respondents said 'No'.

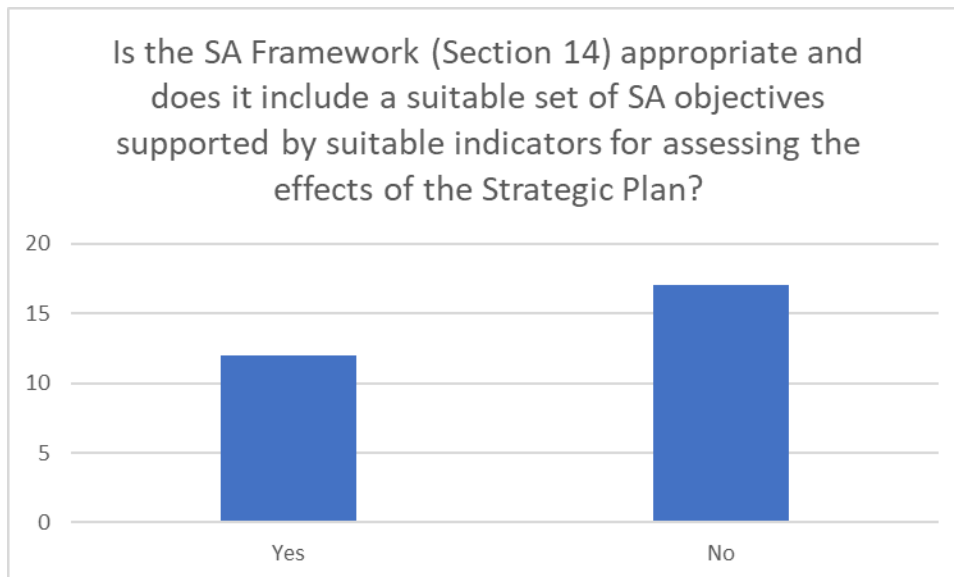
- 42.1 Responses to this question reflected similar themes already raised within responses to earlier questions on the SA Scoping Report consultation. Most respondents did not identify any further issues for the document to cover, however those that did noted the following:
- 42.2 One respondent desired a fuller section on the health and wellbeing benefits to North Northamptonshire on the built environment.
- 42.3 The Environment Agency recommended including more information on contaminated land within the appropriate section and some specific suggestions were made.
- 42.4 Harborough District Council highlighted some information relating to environmental sensitivity issues, these included nutrient and water neutrality requirements issued by Natural England. They also highlighted Anglian Water's WRMP and the regional water deficits likely to be affecting the area.
- 42.5 Ecton Parish Council highlighted a number of issues including suggestions for green corridors, focus on regenerating town centres rather than out of town retail parks, the provision of cycle routes – including the extension of the Greenway and rural broadband provision.
- 42.6 St Modwen Logistics reiterated the issue of imbalance between employment land supply in the west of North Northamptonshire compared to the east and that this should be reflected in future iterations of the SA.

Officer response

42.7 Overall, there was not an abundance of additional issues raised by consultees, but some recommendations on some of the more technical environmental issues are noted and will be considered as the document is revised and developed. Some of the issues relating to specific parish councils may not be appropriate for this document, but some of the broader areas that these issues relate to can be fine-tuned if necessary.

SA Framework

Question 43. Is the SA Framework (Section 14) appropriate and does it include a suitable set of SA objectives supported by suitable indicators for assessing the effects of the Strategic Plan?



- 12 respondents said 'Yes'.
- 17 respondents said 'No'.

43.1 Despite this consultation question receiving more 'No' responses than 'Yes', not all respondents expanded on their answer. However, those that felt the SA Framework or the list of objectives/indicators within were not suitable, explained in some detail as to why they thought this. These were as follows:

43.2 One respondent again noted a lack of reference to the quality of the built environment within this section.

43.3 Another respondent highlighted Indicator SA15 in particular, stating that promoting walking and cycling isn't going to solve problems of accessing work and leisure activities and public transport is not convenient enough for people to use.

- 43.4 Irthlingborough Town Council referenced food production and the maintenance of agricultural land and that indicators for landscape protection should include special areas of protection.
- 43.5 Several developers (Bellway Homes, Hallam Land Management, Miller Homes and Central England Co-Operative) suggested the inclusion of an additional indicator in relation to ensuring a deliverable housing land supply. They also suggested under the SA Topic of Climate Change that an indicator should be added with recommended wording as follows; "Directing development via the Strategic Plan's spatial strategy to sustainable and accessible locations where walking, cycling and public transport use can be maximised reducing the need to travel by car."
- 43.6 On the area of employment within the SA Framework, IM Properties considered that in relation to employment land, a buffer should be applied over and beyond the identified need to ensure flexibility and market competitiveness. Furthermore, they felt many of the indicators act more as objectives or aspirations rather than monitoring indicators and gave an example in relation to the indicator on promoting business development and providing for start-up businesses. They suggested that more specific measures to monitor economic performance would be more appropriate.
- 43.7 St Modwen Logistics provided a very detailed response to this question. Their initial overall comments pointed to some concerns over the supportive text of the SA Framework in that the indicators set out are 'not definitive' and that this is too ambiguous, and some clarity should be sought on this wording. They also raised concerns that the SA objectives that are listed are different from those that were outlined for the JCS, and that no explanation has been given as to why these changes have taken place.
- 43.8 Like IM Properties, St Modwen outlined more detailed concerns on the SA Framework with regards to the economy section. They set out that more, not fewer objectives are necessary on issues relating to employment and the economy given the increased focus on this sector within the region. St Modwen specifically disagree with the deletion of the 'Wealth Creation' and 'Encourage different patterns of movement' objectives that were present in the previous SA for the JCS, but not for the new Strategic Plan.
- 43.9 St Modwen also made comments on the colour coded non-numeric system intended for use against each development option up for consideration. They expressed concerns that this system lacks clarity on how options will be compared against one another to determine their relative sustainability performance and that there is risk of subjectivity and is currently lacking the robustness needed.

Officer response

- 43.10 This consultation question on the SA Scoping Report triggered the most detailed responses. As described above most of the issues identified by respondents surrounded the set of objectives and indicators listed within the

SA Framework. It appears some clarity is needed on changes between the SA Framework that was put together for the JCS and the one for the new Strategic Plan as well as the proposed matrix for use against assessing development options.

- 43.11 Again, specifics on employment and economy issues within the SA Framework were a key area of interest amongst some respondents and consideration for additions and further detail on specific indicators and objectives will potentially be required. Responses received will inform the refinement of the SA Framework.