

# Sustainability Appraisal for the East Northamptonshire Part 2 Local Plan

Adoption Statement

North Northamptonshire Council

September 2023

## Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Ian McCluskey Associate Consultant	Nick Chisholm Batten Technical Director	Ian McCluskey Associate Consultant	Nick Chisholm Batten Technical Director

## Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Name</u>	<u>Position</u>
V1	September 2023	Draft for internal review	Ian McCluskey	Associate Consultant
V2	October 2023	Final Draft	Ian McCluskey	Associate Consultant

### Prepared for:

North Northamptonshire Council

### Prepared by:

AECOM Limited  
100 Embankment,  
Cathedral Approach,  
Salford  
M3 7FB

[aecom.com](http://aecom.com)

© 2023 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for sole use of our client (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

**THIS PAGE IS INTENTIONALLY LEFT BLANK**

## Table of Contents

1.	Introduction.....	1
2.	The ‘story’ of plan-making and SA up to the point of adoption .....	3
3.	How has the SA influenced decision making? .....	6
4.	Monitoring.....	8
5.	Conclusions.....	14

# 1. Introduction

## Background

- 1.1 North Northamptonshire Council (which, subsequent to local government reorganisation, now has responsibility for the area previously administered by East Northamptonshire District Council) has prepared a new Part 2 Local Plan for the East Northamptonshire area. This has been developed in the context of the adopted North Northamptonshire Joint Core Strategy (2016), which forms Part 1 of the Local Plan, as well as the plans and programmes of the surrounding local authorities in accordance with the statutory Duty to Cooperate.
- 1.2 The Part 2 Local Plan was submitted to Government, for Examination by an appointed Planning Inspector, on the 29<sup>th</sup> March 2021. Following an extensive Examination process, the Inspector published a report into the Plan's legal compliance and soundness in July 2023. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Part 2 Local Plan, incorporating modifications, is being put forward for adoption at a Full Council meeting.
- 1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM.

## SA explained

- 1.4 SA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the Part 2 Local Plan's contribution to sustainable development.
- 1.5 A SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations). SA incorporates the requirement for SEA and widens the scope of the assessment to also include social and economic issues.

## This SA Adoption Statement

- 1.6 Regulation 16 of the SEA Regulations sets out the post-adoption procedures with respect to SEA. It requires that, as soon as reasonably practicable after the adoption of a plan for which an SA / SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA Adoption Statement', and inform the public and consultation bodies of the availability of these documents. The consultation bodies are the Environment Agency, Historic England and Natural England.
- 1.7 This document is the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) Adoption Statement to accompany the adoption of the Part 2 Local Plan.

- 1.8 The Sustainability Appraisal (SA) Adoption Statement describes the process, how the findings of the SA were taken into account and informed the development of the Local Plan, and the monitoring indicators that will be applied to check the accuracy of predicted effects and to monitor progress against sustainability objectives.

## 2. The ‘story’ of plan-making and SA up to the point of adoption

### Introduction

- 2.1 This section gives consideration to each of the main plan-making and SA steps in turn. It is common for the plan-making and SA process to involve numerous iterations of the draft Plan, and this was also the case with the East Northamptonshire 2 Local Plan.

### Key plan making milestones

- 2.2 This section outlines the key milestones throughout the plan-making process and the key elements of the Plan that were developed during each stage.

#### Reg 18 consultation document (January - April 2017)

- 2.3 The initial stages of the plan-making process involved scoping out the key issues and early engagement with stakeholders. A ‘Regulation 18’ consultation was undertaken for six weeks, which consisted of several elements.
- A document explaining the plan-making process and asking a series of high-level questions to stakeholders
  - A call for sites
  - SA and HRA scoping

#### Stakeholder Workshops (May 2017 – April 2018)

- 2.4 The first Regulation 18 consultation was followed by a series of workshops, for Members and representatives of Town and Parish Councils. Summary feedback from these workshops (key issues and themes) was reported to the respective Planning Policy Committee meetings. This, together with the Regulation 18 feedback, informed the development of policies and proposals for the draft Plan

#### Draft Local Plan Part 2 Consultation (November 2018 – February 2019)

- 2.5 A full draft of the Local Plan Part 2 was published for consultation, giving stakeholders the opportunity to comment on the draft policies and text. The draft Plan contained a range of policies under following chapters; ‘spatial strategy’, ‘natural capital’, ‘social capital’, ‘economic prosperity’, ‘housing delivery’, ‘town strategies’, and ‘monitoring and implementation’.
- 2.6 Representations received during the draft Local Plan Part 2 consultation were reported to the Planning Policy Committee. The Council’s responses to representations were approved in stages; at various meetings of the Planning Policy Committee held between March 2019 and January 2020:

#### Additional sites consultation (February – March 2020)

#### Alternative sites (Rushden) consultation (October – November 2020)

- 2.7 The Council undertook a focused consultation on proposals for additional development sites in Rushden.

### **Pre submission Draft Local Plan Part 2 consultation (5<sup>th</sup> Feb – 19<sup>th</sup> March 2021)**

- 2.8 The Council (Planning Policy Committee, 27th January 2021) approved the Pre-Submission Draft Local Plan Part 2 for submission to the Secretary of State for Housing, Communities and Local Government, under the Town and Country Planning (Local Plans) (England) Regulations 2012, as amended.
- 2.9 The Regulation 19 consultation took place from Friday 5th February until Friday 19th March 2021, inclusive.

### **Modifications**

- 2.10 Following the Examination hearings, the Council published Proposed Main Modifications to the Plan for public consultation in March -April 2023 . Following this consultation, the Planning Inspector's final report on the Part 2 Local Plan, concluded that with the Inspector's recommended Main Modifications (dated July 2023) the Plan is considered 'sound'.

### **SA Preparation alongside the Local Plan**

- 2.11 This section outlines the key stages and outputs from the SA process and how they related to the preparation of the East Northamptonshire Part 2 Local Plan.

### **North Northamptonshire Joint Core Strategy (2016)**

- 2.12 The Joint Core Strategy sets out the spatial strategy for North Northamptonshire including the East Northamptonshire area, which is important from an SA perspective, as it narrows the scope of the Plan. In particular, the need to consider reasonable alternatives for growth is reduced given the framework set by the Joint Core Strategy.
- 2.13 The Joint Core Strategy was subjected to a legally compliant SA process, which tested different spatial options for housing and employment growth. This influenced the spatial strategy for the East Northamptonshire area (and the rest of North Northamptonshire), and it was not necessary to reconsider such issues.

### **Scoping**

- 2.14 The start of the SA process was to prepare and consult on a SA Scoping Report. A number of consultation bodies (notably the Statutory Bodies: Historic England, the Environment Agency, and Natural England) and other stakeholder bodies were consulted on the Scoping Report alongside first Regulation 18 consultation stage between January – April 2017.
- 2.15 The scope was revisited and updated throughout the plan-making process. However, the underlying key issues remained fundamentally the same as those agreed during the initial scoping consultation. Therefore, the SA Framework remained appropriate.

### **Interim SA work (2017-2020)**

- 2.16 SA was undertaken alongside key stages of plan making, with the preparation of interim SA Reports helping to inform decision making. The following key tasks were undertaken as the Plan progressed.



- Consideration and appraisal of spatial strategy options including housing growth and distribution;
- Appraisal of housing options for Oundle (Interim Report, December 2018)
- Appraisal of site options.
- Appraisal of draft policies.

### **Sustainability Appraisal (SA) of the Publication Plan (January 2021)**

2.17 The SA Report accompanied the Publication version of the Local Plan that was subsequently submitted to government for independent examination following consultation. The SA Report presented an updated appraisal of the Plan 'as a whole', focusing on policies, site allocations and the overall strategy.

### **SA Report Addendum: Appraisal of Modifications (November 2022)**

2.18 Following the Local Plan examination hearings, an update to the sustainability appraisal was undertaken to take account of the proposed Main Modifications.

2.19 This involved screening the Main Modifications to identify those that could potentially lead to substantial changes to the SA findings / give rise to significant effects. The Main Modifications that were 'screened in', were then considered in further detail to identify if there were any reasonable alternatives, and to establish the implications of the changes to the plan in sustainability terms.

2.20 The appraisal identified that the main modifications would lead to no significant effects, and limited changes to the sustainability appraisal findings when considering the overall effects of the Plan 'as a whole' (compared to the Submission version of the Plan).

## 3. How has the SA influenced decision making?

### Introduction

- 3.1 Essentially, SA must feed-into and inform plan-making in two ways:
1. Appraisal of alternatives and draft policies should inform preparation of the draft Plan.
  2. The SA Report, and consultation responses received during the Draft Plan / SA Report consultation, should inform plan finalisation.
- 3.2 This section briefly discusses the key elements of the SA process, and how the findings were fed-into the Plan making process. There is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal, site assessments, policy appraisal, and consultation on Plan / SA documents.

### Influencing the spatial strategy

- 3.3 When considering alternatives to the policies and approaches within the Part 2 Local Plan, it was important to acknowledge the role of the Joint Core Strategy. The Joint Core Strategy already sets the spatial strategy for the East Northamptonshire area, and so no further reasonable alternatives were identified in this respect.
- 3.4 There was, however, scope for the Part 2 Local Plan to explore the potential to plan for further housing growth to support 'local needs'. The Council explored options for different settlements, with each discussed in turn below.

### Oundle

- 3.5 Two strategic options were identified and appraised for Oundle. The first saw three strategic sites being proposed as part of the Draft Plan (informed by site assessments and other evidence). The second option involved a different package of sites, informed by the emerging Oundle Neighbourhood Plan. The options performed very similarly overall across the full range of SA topics.

### Rushden and Irthlingborough

- 3.6 Five strategic locations at Irthlingborough and Rushden (lying within the East Northamptonshire area) were identified as reasonable alternatives and subsequently assessed as potential site options for growth.
- 3.7 The SA broadly supported the decision to allocate a site in Rushden. However, concerns arose about the specific site identified, so additional SA (and HRA) work was undertaken to understand potential impacts and influence the decision making process.

## Unreasonable alternatives

3.8 The SA process was utilised to establish that the following alternatives were unreasonable:

- Increased amount of housing overall to provide further flexibility,
- Increased housing growth in rural areas,
- Propose additional employment land allocations,
- Increased growth in Higham Ferrers, Raunds and Thrapston.

## Influencing policy content

3.9 Once draft policies had been written, these were appraised against the SA framework to identify potential positive and negative effects. At this stage, the SA also identified a series of mitigation and enhancement measures, which were then considered by the Council when finalising the policies.

3.10 Site appraisals were also undertaken to identify constraints and opportunities for different site options. As part of this process, measures were identified to aid in mitigation at specific sites. For example, this included measures such as; the need to consider the setting of heritage assets, the need to compensate for the loss of community facilities, and the need to promote enhanced walking and cycling measures.

## Influencing the Main Modifications

3.11 Further sustainability appraisal was undertaken at this stage to understand the implications of the proposed Main Modifications. A report was published in November 2022 setting out the findings.

3.12 Eight Modifications (including 3 modifications involving similar changes related to the HRA) were identified for further exploration. This involved a consideration of potential alternatives, though none were found to be reasonable. The Main Modifications were also subjected to appraisal both individually, and also considered 'as a whole'.

3.13 The Modifications were identified as having positive and negative implications, but none of these were found to be significant or to lead to notable changes to the SA Report findings. No mitigation or enhancement measures were identified throughout the appraisal process at this stage.

## 4. Monitoring

- 4.1 The SEA Regulations require that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”*.
- 4.2 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements identified in the SA Report. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA are based on data that is already being routinely collected at a local level by North Northamptonshire Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Part 2 Local Plan.
- 4.3 Table 4.1 outlines a monitoring framework for measuring effects of the East Northamptonshire Part 2 Local Plan against each of the SA themes presented in the SA Report. This will ensure that any significant effects continue to be monitored over the plan period.
- 4.4 Monitoring measures in purple text are those that are **already part of the monitoring framework for the Joint Core Strategy**.
- 4.5 Monitoring measures in blue text are those that are **proposed for monitoring the Part 2 Local Plan itself**. There is some overlap between these indicators and those that are being used for the Joint Core Strategy.
- 4.6 All other indicators are those being suggested through the SA process as additional measures, to monitor specific effects identified in the SA that are not covered by the existing and proposed Local Plan monitoring frameworks.

**Table 4.1 SA Monitoring Framework for the East Northamptonshire Part 2 Local Plan**

Summary of effects	Potential monitoring measures
<p><b>Accessibility</b></p> <p><b>Significant positive effects</b> are predicted due to a focus on accessible locations and support for green infrastructure enhancement.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Accessibility to services and facilities from new residential developments.</li> <li>• Completion of Greenway projects/ developments</li> </ul>
<p><b>Housing</b></p> <p><b>Significant positive effects</b> due to support for additional housing across the HMA.</p>	<ul style="list-style-type: none"> <li>• Net additional dwellings</li> <li>• Number of dwellings permitted/constructed within the different category areas of the settlement hierarchy</li> <li>• Affordable housing provision</li> </ul>
<p><b>Health and Liveability</b></p> <p><b>Significant positive effects</b> due to a combination of housing delivery, regeneration, creation and enhancement of open space, green infrastructure and the promotion of active travel.</p>	<ul style="list-style-type: none"> <li>• Provision of accessible greenspaces</li> <li>• Net loss/ gain in GI across the district</li> <li>• Completion of Greenway projects/ developments</li> <li>• Amount of new sports and recreation facilities provided/ contributions secured toward facilities.</li> </ul>

<p><b>Crime</b></p> <p>The regeneration of key town centre sites may contribute to improved community safety and reduce the perception of crime in the district. Overall, a <b>minor positive effect</b> is predicted.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Improvement of deprivation</li> <li>• Improvement of crime rates</li> </ul>
<p><b>Community</b></p> <p><b>Minor positive effects</b> are predicted with regards to community cohesion.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>•</li> </ul>
<p><b>Biodiversity</b></p> <p>The additional protections and enhancement measures are considered likely to lead to <b>minor positive effects</b>. This relates to the potential to strengthen ecological networks from a locally specific perspective.</p>	<ul style="list-style-type: none"> <li>• % of nationally important wildlife sites that are in favourable condition.</li> <li>• Woodland access</li> <li>• Net loss / gain in Green Infrastructure across the borough.</li> <li>• Change in areas of biodiversity importance.</li> <li>• Net loss/ gain in GI across the district</li> </ul>
<p><b>Landscape</b></p> <p>Though additional site allocations could lead to some <b>minor negative effects</b>, the broader policies in the Plan are protective and where regeneration is involved could lead to <b>minor positive effects</b>.</p>	<p>Whilst no significant effects have been identified, the following indicators could be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Number of permissions and refusals when policies relating to design / landscape were used to make the decision.</li> </ul>

## Cultural Heritage

Though some development locations are close to or contain heritage assets, there are policy mitigation and enhancement measures in place. Several plan policies should also have indirect positive effects on heritage through improvements to the public realm. Overall **minor positive effects** are predicted in the long term.

Whilst no significant effects have been identified, the following indicators could be used to monitor general trends:

- Number of listed Buildings on the At-Risk Register.
- Maintaining non designated Heritage Assets
- Change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub regional or local significance
- Permissions and refusals where heritage and design policies were used to make the decision.

## Air

The Plan supports growth in accessible locations and encourages an increase in sustainable modes of travel and green infrastructure. Overall, the effects in terms of air quality are predicted to be **minor positive** in the long term.

Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:

- Locations close to or exceeding levels of poor air quality sufficient to warrant designation of an air quality management area.

## Water

The Plan is likely to have some indirect **minor positive effects** through the introduction of green infrastructure and sustainable drainage.

Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:

- % of river lengths assessed as having 'good' biological/ chemical quality as defined by the Water Framework Directive.

<p><b>Natural Hazard</b></p> <p>The additional provisions of the Local Plan do not undermine the strategic directions or add any significant enhancements in respect of flooding. On balance, <b>neutral effects</b> are predicted.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Residential development permitted in Flood Zones 2 and 3.</li> </ul>
<p><b>Soil and Land</b></p> <p>On balance, <b>neutral effects</b> are predicted overall, with some gains and some losses in relation to soil and land in different parts of the district.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Number and % of new development on previously developed land.</li> <li>• Loss of best and most agricultural land by classification (Ha)</li> </ul>
<p><b>Minerals</b></p> <p>The Plan has limited policy influence on minerals planning. The small scale of growth also means that any overlap with mineral safeguarding areas is insignificant. Overall, <b>neutral effects</b> are predicted.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Hectares of development land located within mineral safeguarding areas.</li> </ul>
<p><b>Energy Use and Climate Change</b></p> <p>The continued support provided at the local level (to climate change efforts) is likely to support wider actions to move to carbon neutrality and deliver <b>minor positive effects</b> in this respect.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Number and proportion of appropriate developments implementing SUDs and green roofs.</li> <li>• Permitted and Completed Renewable Energy Installations by type and area</li> </ul>



<p><b>Waste</b></p> <p>The Plan does not propose any measures which are likely to undermine existing waste planning or provide any significant opportunities for enhancement. Therefore, <b>neutral effects</b> are predicted.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p>
<p><b>Employment, wealth creation and skills</b></p> <p>The plan sets out a strategy to deliver economic development throughout the district with a focus on protecting and enhancing town centres and existing employment areas. Whilst there is some loss of employment land likely to occur, this is outweighed by the benefits of regeneration opportunities. The provision of new education facilities in identified locations is predicted to have <b>significant positive effects</b> in terms of education.</p>	<ul style="list-style-type: none"> <li>• Total amount of new employment floorspace.</li> <li>• No. of net additional jobs provided by LPA on an annualised basis.</li> <li>• Use status/retention of existing employment sites</li> <li>• Completion / progress of new education facilities</li> </ul>
<p><b>Town Centres</b></p> <p>The Plan seeks to both enhance and protect the vitality and viability of town centres, including through new uses, regeneration and an element of housing provision (delivered through the Local Plan). As a result, <b>significant positive effects</b> are predicted</p>	<ul style="list-style-type: none"> <li>• Report on the quantum and scale of retail developments (m<sup>2</sup> net) approved outside of the defined town centre areas.</li> <li>• Change of use of upper floors</li> <li>• Change of use to residential (non-primary frontage)</li> <li>• Percentage of non-retail within primary frontages</li> </ul>

## 5. Conclusions

- 5.1 This SA Adoption Statement demonstrates that a robust and iterative SA process has been progressed alongside plan-making, with appraisal findings feeding-in to decision-making at each stage. Any representations received were taken into account and informed subsequent stages of the SA process. The SA Report demonstrably complies with the SEA Regulations and is found to be adequate by the Inspector.
- 5.2 In summary, the following reports were published as part of the SA process:
- SA Scoping Report (2017);
  - Interim SA Report (Oundle Spatial Options, 2018)
  - Interim SA Report (Draft Local Plan, 2019)
  - Regulation 19 SA Report (January, 2021); and
  - SA Report Addendum (November 2022).
- 5.3 Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the Part 2 Publication Plan (Regulation 19 version) in December 2019, presenting the required information. The report served to inform representations on the Plan, and then served to inform plan finalisation. The Inspectors Final Report (July 2023) also states that in terms of legal compliant the SA carried out is 'adequate'.
- 5.4 This SA Adoption Statement is the final step in the SA process.



