

West Northamptonshire Joint Core Strategy SA Addendum: Final Report (December 2013)

Appendix 1

Scoping Consultation Comments

Table 1: Statutory Environmental Bodies Consultation responses received in relation to the West Northamptonshire Joint Core Strategy Sustainability Appraisal Addendum: Scoping Report

Note that chapter and paragraph references in this table relate to the Scoping Report.

Respondent	Section	Comment	Response to comments
English Heritage	Chapter 3	Chapter 3 provides a reasonable summary of the contextual baseline relating to the historic environment, and the number of designated heritage assets shown in the tables for the three districts appears to be accurate at the time of writing. It should be noted that Edgcote Battlefield in South Northamptonshire is currently being considered for registration, which would affect the figures shown in Table 3.6 (although it is unlikely to have a major impact on the Core Strategy's distribution of development due to its location).	Noted. Edgcote Battlefield has only very recently been registered, and the baseline information has been amended to reflect that. However, it is unlikely that Edgcote Battlefield will have a major impact on the Core Strategy's distribution of development due to its location.
English Heritage	Chapter 3	The discussion of constraints for the four towns provides a useful overview of potential heritage issues that might arise through new development, although the discussion can be a bit selective at times. For example, for Northampton (paragraphs 3.14 to 3.21), it should be noted that Moulton contains a conservation area, which makes the statement in paragraph 3.18 that "land immediately to the north of Moulton... is largely free from cultural designations" somewhat inaccurate, as the setting of the conservation area could be an issue. In the same paragraph, the registered park and garden and conservation area of Boughton Park is described as potentially constraining development to the north and west of Boughton, when it also potentially constrains development to the east given the geography.	Noted. This information has been reflected in Chapter 3 of this SA Addendum.
English Heritage	Chapter 3	The Northampton paragraphs should also make reference to Northampton Battlefield, which may act as a constraint on development. Paragraph 3.19 should also refer to the scheduled monument near Upton (a deserted medieval village). Finally, paragraphs 3.15 and 3.16 appear contradictory; paragraph 3.15 ends by saying land around Little and Great Houghton is less restricted by environmental and heritage designations, when paragraph 3.16 starts by saying the area around the villages is of high sensitivity.	Noted. This information has been reflected in Chapter 3 of this SA Addendum.

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English Heritage	Chapter 3	For Daventry (paragraphs 3.29 to 3.33), we welcome the identification of Borough Hill and other archaeological sites as a constraint to development. Paragraph 3.32 should state that the Grand Union Canal is designated as a conservation area, along with Daventry Reservoir.	Noted. This information has been reflected in Chapter 3 of this SA Addendum.
English Heritage	Chapter 3	For Brackley (paragraphs 3.37 to 3.44), there should be reference to Turweston Conservation Area to the east of the town, which also contains a number of listed buildings.	Noted. This information has been reflected in Chapter 3 of this SA Addendum.
English Heritage	Chapter 3	For Towcester (paragraphs 3.46 to 3.55), we welcome the recognition given to sensitive heritage assets to the east of the town (e.g. Easton Neston), as well as within the town centre itself.	Noted, no action required.
English Heritage	Appendix 1	In terms of the maps in Appendix 1 that show heritage assets within and surrounding the four towns, the depiction of registered parks and gardens is not clear. The use of a purple line with no shading makes it difficult to spot parks and gardens on the maps, and impossible to see when they are overlain by a conservation area designation (e.g. Boughton Park to the north of Northampton or Easton Neston to the east of Towcester). We recommend that parks and gardens are shown more clearly.	Noted. These maps have been updated and can be found in Appendix 2 of this SA Addendum.
English Heritage	Appendix 1	Conservation areas within central Northampton are also hard to distinguish, while the map of Daventry is missing Daventry Reservoir Conservation Area. The map for Brackley does not show any designated heritage assets to the east of the town, despite the proximity of Turweston Conservation Area and a number of listed buildings. This is partly due to the proximity of a neighbouring district (Aylesbury Vale), but the relevant data should be obtained (it would show that development to the east of the A43 in Brackley would have considerable impact on heritage assets at Turweston). Data is also missing for the district to the west of Daventry, although the local authority boundary is further away and less likely to be affected.	Noted. These maps have been updated and can be found in Appendix 2. It has not been possible to obtain data from adjacent districts.
English Heritage	Additional Sustainability Issues	The historic environment is already identified as a sustainability issue, along with landscape and townscape. We cannot think of any additional issues relevant to our remit.	Noted, no action required.

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English Heritage	Proposed Approach to Appraisal of Reasonable Alternatives	The use of a matrix based approach to appraising reasonable alternatives and the proposed scoring as set out in paragraphs 4.9 to 4.15 seems appropriate. Given that heritage assets form a key part of the reasonableness criteria used to identify reasonable alternatives in terms of spatial distribution and specific sites, one would hope that locations with significant negative issues for heritage assets will have already been discounted. This would then make the appraisal of reasonable alternatives a more nuanced assessment and require professional judgement on the exact impacts (e.g. considering the likely impact on setting of heritage assets).	Noted. Locations with significant issues relating to heritage assets have been discounted as they are not classed as a reasonable alternative. For example, sites that contain scheduled monuments have not been included in the SA.
English Heritage	The SA Framework	Using the same SA Framework that has been used throughout the production of the Core Strategy seems logical, although prevents any update of SA objectives and appraisal questions to reflect changes in national policy. With regards to the archaeology and cultural heritage objective, our response to the SA Scoping Report for the "Part 2" documents of the Local Plans (dated 5 February 2013) recommended updating this objective to reflect the NPPF (referring more explicitly to heritage assets and setting). At this late stage in the production of the Core Strategy, the benefits of retaining the existing SA Framework may outweigh the negatives, although we can only comment on issues relevant to our remit.	Noted, no action required.
English Heritage	Reasonableness Criteria	<p>The criteria are intended to help with identification of specific reasonable alternatives for the spatial distribution of development within the plan area (specifically for the four main towns, but also potentially for new settlements) as well as alternatives to strategic site allocations. We welcome the two draft criteria relating to avoiding heritage assets, based on the NPPF and the objectives of the Core Strategy. This presumably will help sift out alternatives that are not reasonable because of their impact on heritage assets.</p> <p>There are differences between the two criterion, in that the NPPF derived criterion only refers to designated heritage assets of the highest significance (thereby excluding Grade II assets and conservation areas and undesignated heritage assets) and does not refer to setting, while the Core Strategy derived criterion refers to all heritage asserts and their settings. There does not appear to be any hierarchy between the NPPF and Core Strategy derived criteria, but they could perhaps be merged into one single criterion. Such a criterion should refer to all heritage assets and their setting, although in terms of</p>	Noted. This has been addressed in Table 4.1 of this SA Addendum.

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		showstoppers, heritage assets of the highest significance (including undesignated assets where applicable) should be considered particularly strongly. Avoiding clusters of heritage assets (e.g. group of Grade II listed buildings) should also be a key aim regardless of grade or designation.	
Natural England	Table 3.1	Unfortunately, we do not have the resources to validate the data in Table 3.1.	Noted, no action required.
Natural England	Sustainability Issues	We are not aware of any additional key sustainability issues relating to the areas likely to be affected that should be included;	Noted, no action required.
Natural England	Approach proposed to the appraisal of reasonable alternatives	We have no views on the general approach, but we regard that in so far as this general approach is appropriate, the natural environment has been adequately considered.	Noted, no action required.
Natural England	Table 4.1	With respect to Biodiversity, flora and fauna, we suggest adding "Would the option have the effect of prejudicing future habitat restoration (e.g. by developing the only land capable of linking two ancient woodland blocks)?" There is a danger that development leads to the creation of islands of biodiversity, permanently severed from other areas.	Noted. No change has been made to the SA objectives/assumptions as it has already been assumed that all SUEs would incorporate appropriate green infrastructure creation and enhancement which will benefit habitat connectivity. Where specific policies refer to biodiversity assessments and enhancements, this has also been reflected in the SA.
Natural England	Table 4.1	With respect to Soil, geology and land use, there is no explicit consideration of avoiding best and most versatile soils. We suggest adding..."Avoidance of the loss of best and most versatile soils?"	Noted. While this issue is not explicitly set out as one of the appraisal questions in the SA

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			<p>framework, the assumptions that have been applied in the SA of residential and employment site options (which can be found in Appendices 5 and 12 respectively) require consideration to be given to whether a site is located on high quality agricultural land, and this issue therefore contributes to the scores given for each site in relation to SA objective 13.</p>
Natural England	Table 4.1	<p>Under Landscape and townscape, there are questions relating to enhancing provision of recreational resources, but none relating to impacts on existing recreational assets (quality and or extent). We suggest adding to the 3rd bullet point "...linking open space etc., and avoids impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?"...</p>	<p>Noted. No change has been made to the SA Framework as impacts on existing recreational assets have already been considered under SA objective 7.</p>
Natural England	Chapter 1, Reasonableness Criteria	<p>We regard the criteria as set out in table 1.1 to be suitable as they relate to the natural environment.</p>	<p>Noted, no action required.</p>
Environment Agency	Chapter 3	<p>We must reiterate that adequate water and wastewater infrastructure is needed to support sustainable development. The Water Cycle Study provides evidence of the impact of the development proposed in the Joint Core Strategy for West Northamptonshire on water quality and supply and is an important part of the evidence base which underpins the strategy. It is essential that the impact of alternative development on water quality is assessed for the area and an integrated approach to water management with the planning and design of new neighbourhoods, to ensure that new development meets the needs of sustainable growth, seeks to reduce the impacts on water quality and removes or mitigates the risk of non-compliance with the Water</p>	<p>Noted. Issues relating to water quality are addressed through the SA assumptions that have been applied to the appraisals of all the residential and employment site options (these can be found in Appendix 5 and 12 respectively). In addition, the housing numbers proposed</p>

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		Framework Directive.	in the JCS are lower than the level that the Water Cycle Study identified as being achievable in terms of water quality.
Environment Agency	Chapter 3	We can confirm that the tributaries referred to in Paras 3.16 - 3.19 are the Wootton Brook and Brampton Branch of the River Nene.	Noted, no action required.
Environment Agency	Chapter 3	The flood zones on Figure A1 do not include the areas benefiting from defenses.	Noted.
Environment Agency	Sustainability Issues	There are no additional key sustainability issues relating to the areas likely to be affected that should be included	Noted, no action required.
Environment Agency	Approach proposed to the appraisal of reasonable alternatives	Yes the approach is appropriate.	Noted, no action required.
Environment Agency	SA Framework	<p><u>Water</u> Rerword to: Maintain and continue to improve the <u>ecological and chemical</u> quality of <u>groundwater</u> and <u>surface waters</u>.</p> <p>... Development likely to affect the ecological <u>and chemical</u> status of groundwater and surface waters and the ability of receiving water to accept additional flows?</p> <p>Remove reference to PPS25 (in point 3) and refer to the NPPF and its Planning Practice Guidance. Rerword to: Development which supports and corresponds with the NPPF, Planning Practice Guidance and the flood risk management policies of the EA <u>and LLFA</u>?</p> <p>Include: Will the plan/option lead to... ... the sustainable use of water resources; ... the requirements of the Water Framework Directive River Basin Management Plans being met (incl. improvement of water bodies).</p>	Noted. These amendments have been made in the SA framework presented in Table 4.2 of this SA Addendum and reflected throughout the SA matrices and the SA Addendum as appropriate.

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	 Maintain and enhance riverside and water based recreational activities (including navigation, angling, canoeing).	
Environment Agency		<p><u>Population and Human Health</u></p> <p>Include: Will the plan/option lead to...</p> <p>... Minimise and reduce local flood related risks to the population and the environment and adverse impacts on human health.</p>	Noted. This amendment has been made in Table 4.2 in this SA Addendum.
Environment Agency	Reasonableness Criteria	The draft reasonableness criteria for <i>Flooding</i> (Table 1.1) refers to Flood Zones 2 and 3 as areas of " <i>higher risk of flooding</i> ". Indeed they have a higher probability of flooding than Flood Zone 1, but for clarity we suggest that this part is reworded to ... as these areas have a 'medium' and 'high' probability of flooding.	Noted. This amendment has been made in Table 4.1 in this SA Addendum.