West Northamptonshire Joint Core Strategy

SA/SEA and HRA Adoption Statement

Prepared by LUC
December 2014
Project Title: Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulations Assessment of the West Northamptonshire Joint Core Strategy

Client: West Northamptonshire Joint Planning Unit

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<thead>
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<th>Version</th>
<th>Date</th>
<th>Version Details</th>
<th>Prepared by</th>
<th>Checked by</th>
<th>Approved by Principal</th>
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</thead>
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<td>1</td>
<td>12/11/14</td>
<td>Draft SA/SEA and HRA Adoption Statement for the West Northamptonshire Joint Core Strategy</td>
<td>Kate Nicholls</td>
<td>Taran Livingston</td>
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<td>2</td>
<td>03/12/14</td>
<td>Final SA/SEA and HRA Adoption Statement for the West Northamptonshire Joint Core Strategy</td>
<td>Kate Nicholls</td>
<td>Taran Livingston</td>
<td>Jeremy Owen</td>
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1 **Introduction**

1.1 The West Northamptonshire Joint Strategic Planning Committee (JSPC) adopted the West Northamptonshire Joint Core Strategy on 15 December 2014.

1.2 During the preparation of the Joint Core Strategy, the Joint Planning Unit (JPU) was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports published alongside the different versions of the West Northamptonshire Joint Core Strategy during its development.

1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires the West Northamptonshire JPU (who prepared the Joint Core Strategy for the JSPC) to make the final SA Report available alongside the Adopted Joint Core Strategy.

1.4 The final SA Reports for the Adopted Joint Core Strategy comprise the following documents:

- The **February 2011 SA Report** which was consulted upon alongside the Pre-Submission version of the Joint Core Strategy (February 2011). The same SA Report was then submitted to the Secretary of State for Examination in December 2012 alongside the July 2012 SA addendum (see below). This document forms the majority of the final SA Report and it includes the non-technical summary (required by the SEA Directive).

- The **July 2012 SA Addendum** which was prepared to accompany consultation on the Proposed Changes to the Pre-Submission Joint Core Strategy between July and September 2012. This SA Addendum was intended to be additional to and read alongside the February 2011 SA Report for the Pre-Submission Joint Core Strategy. The SA Addendum was also submitted to the Secretary of State for Examination in December 2012 alongside the Proposed Changes to the Pre-Submission version of the Joint Core Strategy (July 2012) and the February 2011 SA Report.

- The **December 2013 SA Addendum** which was prepared at the request of the Examination Inspector. During the initial Examination hearing sessions in April 2013, the Inspector requested that the JPU undertake some additional work to assess levels of housing needs in the plan area and also to prepare a SA Addendum Report to address shortcomings in the SA work that had been undertaken previously, particularly in relation to the selection of Sustainable Urban Extension (SUE) sites. As a result of the additional work to assess levels of housing needs, Main Modifications to the Joint Core Strategy (as submitted) were proposed by the JPU and the SA of these Proposed Main Modifications was also included in the December 2013 SA Addendum.

**Requirement for the Adoption Statement**

1.5 In addition to the Planning Regulations requirement for publishing the final SA Report alongside the Adopted Joint Core Strategy, the SEA Regulations also require a number of steps to be taken upon adoption of a local plan (in this case the Joint Core Strategy). Specifically, Regulation 16 sets out the post-adoption procedures for the SEA, and 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 about the availability of these documents. The consultation bodies are English Heritage, Natural England and the Environment Agency. The SEA adoption statement must explain:

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1 The Environmental Assessment of Plans and Programmes Regulations 2004 - SI No. 1633.
- How environmental (and sustainability) considerations have been integrated into the plan.
- How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
- How the opinions expressed by the public, consultation bodies and where appropriate other European Member States, during consultation on the plan and Environmental/SA Report have been taken into account.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.

1.6 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the West Northamptonshire Joint Core Strategy. The document is structured according to the SEA Regulation requirements listed above:

- **Section 2** explains who carried out the SA/SEA and what assessment framework was used.
- **Section 3** summarises the links between the plan-making and SA/SEA processes and how the SA/SEA recommendations were taken into account.
- **Section 4** summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments.
- **Section 5** describes the alternatives/options considered as part of the Joint Core Strategy preparation process, and why certain options were chosen.
- **Section 6** describes how the significant sustainability/environmental impacts of the Joint Core Strategy will be monitored.

**Habitats Regulations Assessment**

1.7 The Joint Core Strategy was also required by law to be subject to Habitats Regulations Assessment throughout its preparation. HRA reports were published alongside the Joint Core Strategy during consultation periods, with the full HRA report being produced in 2011 to accompany the Pre-Submission Joint Core Strategy. HRA Addendums were produced in 2012 and 2013 to address the Proposed Changes and Main Modifications respectively.

1.8 Although there is no legal requirement for an adoption statement to be produced in relation to the HRA, **Section 7** of this document describes the process that was undertaken for the HRA and summarises how the HRA contributed to the development of the Joint Core Strategy at each stage.
2 How environmental and sustainability considerations have been integrated into the Joint Core Strategy

2.1 The SA (incorporating SEA) of the Joint Core Strategy was undertaken independently by consultants on behalf of the JPU. Between 2006 and 2012 the SA work was carried out by Environ. LUC was appointed in June 2013 to undertake some additional SA work that was required by the Inspector following the initial Examination hearings. The consultants have provided advice to the JPU throughout the preparation of the Joint Core Strategy.

2.2 The purpose of the SA was to assist the JPU in preparing the Joint Core Strategy by identifying the key sustainability/environmental issues facing the plan area, to predict what would be the likely effects of the Joint Core Strategy on these issues, and to put forward recommendations to improve the Joint Core Strategy. The aim was to ensure that the Joint Core Strategy has as many positive effects as possible and that any negative effects are avoided when the policies are implemented and result in new development within West Northamptonshire.

2.3 The SA was undertaken iteratively, such that at each stage of the Joint Core Strategy’s development an assessment of the sustainability and environmental effects of the options for the Joint Core Strategy and subsequently its policies was made. SA Reports were produced to describe the approach taken, identify the effects and put forward recommendations to avoid or minimise negative effects identified or enhance positive effects. In this way, environmental and sustainability considerations were integrated into the Joint Core Strategy as it was developed.

2.4 The way in which the environmental and sustainability effects of the Joint Core Strategy were described, analysed and compared was through the use of a set of SA objectives. The SA objectives for the Joint Core Strategy were developed by Environ in collaboration with stakeholders, drawing on a review of relevant European, national and regional plans and programmes and the objectives they contained. The resulting SA ‘framework’ comprised 15 SA objectives which were supported by a set of more detailed appraisal questions that were used to decide whether the Joint Core Strategy would be likely to achieve each objective. The SA objectives covered all of the environmental topics required by the SEA Regulations.

2.5 The SA framework for the Joint Core Strategy was originally presented in the 2006 SA Scoping Report and included a set of SA objectives covering all of the SEA topics. Following the scoping consultation the SA framework was updated to reflect statutory consultee comments and the revised version was presented in the 2007 SA Report. That updated SA framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies for the Joint Core Strategy. A small number of minor changes were made to the SA framework for the 2013 SA Addendum work to address the statutory consultee comments on the July 2013 revised Scoping Report (described in Section 4 of this Adoption Statement).

2.6 The SA framework for the Joint Core Strategy is shown in Table 2.1 overleaf (strikethrough for deleted text and underlined for added text shows where objectives were amended following consultation with statutory consultees).
<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Appraisal questions. Will the plan/option lead to...?</th>
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</table>
| **1. Air quality and noise**       | a) Reduce the need to travel and facilitate modal shift.  
b) Reduce/minimise the potential increase in congestion.  
c) Avoid sensitive development within areas of high noise levels or poor air quality.                      |
|                                    | • An increase in motor vehicle trips and increased dependence on car use?  
• Sensitive location of new development in areas of high noise levels or poor air quality.  
• Support for the objectives of local air quality action plans?  
• Improvements in existing local public transport infrastructure or access to public transport?  
• Exacerbating existing traffic congestion hotspots or improvements to the current situation?  
• The inclusion of policies to enhance air quality where new development may deliver a means of doing so? |
| **2. Archaeology and cultural heritage** | a) Protect the fabric and setting of designated and undesignated archaeological sites, monuments, structures and buildings, registered Historic Parks and gardens, registered battlefields, listed buildings and conservation areas (or their settings). |
|                                    | • Development that affects listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields (or their settings)?  
• Development being steered to where it can be accommodated in less sensitive areas?  
• Distinctive development that is well related to the natural environment and characteristic scale, form materials and detailing of the settlement and contributes to a sense of place?  
• Promotes the enhancement of the archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?  
• Will the plan proposals provide opportunities for the enhancement of historic assets, townscapes and landscapes? |
| **3. Biodiversity, flora and fauna** | a) Maintain and enhance the structure and function of habitats and populations of species, including those specifically protected.  
b) Enhance and protect greenspace networks and habitat connectivity, including river and stream corridors, to assist in species migration and |
|                                    | • Avoidance of net loss, damage to, or fragmentation and positive enhancement of designated wildlife sites protected species and priority species / habitats within the Northamptonshire BAP?  
• Opportunities for people to come into contact with robust wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?  
• Development which includes the integration of ecological conditions and contributes to improvement in |
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<thead>
<tr>
<th>SA Objective</th>
<th>Appraisal questions. Will the plan/option lead to...?</th>
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<tbody>
<tr>
<td>dispersion.</td>
<td>ecological connectivity in rural and urban areas?</td>
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<tr>
<td>c) Increase the land area of UK Biodiversity Action Plan habitats within the area.</td>
<td></td>
</tr>
<tr>
<td>d) Maintain and improve the conservation status of selected non-designated nature conservation sites.</td>
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</table>

4. Crime and community safety

a) To improve community safety, reduce crime and the fear of crime.

b) Promote sustainable modes of travel to access education.

- Changes in crime levels and fear of crime through improvements to the environment, layouts of streets and public space, passive surveillance, lighting etc.
- Leisure facilities for young people at the neighbourhood level including consideration of provision as part of large new residential developments.

5. Education and training

a) Improve educational attainment and promote lifelong learning.

b) Promote sustainable modes of travel to access education.

- Improvements in educational attainment, qualification levels and participation in education and training.
- Adequate supporting educational infrastructure associated with new residential developments.
- New education facilities well located in relation to walking, cycling and public transport routes.

6. Energy and climatic factors

a) Continue to improve energy efficiency of dwellings.

b) Continue to increase the provision of ‘affordable warmth’.

c) To decrease the dependency on oil for space heating.

d) Increase the local renewable energy generating capacity.

- An average increase in the SAP rating of dwellings?
- A reduction of the average household fuel bill.
- A decrease in oil consumption.
- Major developments incorporating renewable energy measures into the design.
- An increase in energy efficient measures and CHP in the design new developments.
- An increase in the number of large scale renewable energy schemes.
- A better consideration of climate change adaptation measures?
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<tr>
<th>SA Objective</th>
<th>Appraisal questions. Will the plan/option lead to...?</th>
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<tbody>
<tr>
<td>7. Health and well being</td>
<td>a) To improve health and reduce health inequalities.</td>
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<tr>
<td></td>
<td>• Healthier lifestyles?</td>
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<tr>
<td></td>
<td>• Improved access to healthcare?</td>
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<td></td>
<td>• Improve the quality of homes?</td>
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<tr>
<td>8. Labour market and economy</td>
<td>a) To create high quality employment opportunities and develop a strong culture of enterprise and innovation.</td>
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<td></td>
<td>• An adequate supply of land, skills and infrastructure (such as ICT) to meet the requirements of growth sectors and fully exploit locational/ economic opportunities while not harming the environment.</td>
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<td>• Minimise travel distances to work and commuting by modes other than the car. Ensuring access to employment by public transport, walking and cycling.</td>
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<td></td>
<td>• An appropriate range of employment opportunities in rural areas.</td>
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<td>9. Landscape and townscape</td>
<td>a) Ensure that the quality, character and local distinctiveness of the landscape, and the features within them are conserved and enhanced.</td>
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<td></td>
<td>b) Enhance the form and design of the built environment.</td>
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<td></td>
<td>• Provide the character areas and SLA’s with the highest level of policy protection, make appropriate provision for their economic and social wellbeing and reflect Management Plan objectives?</td>
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<td></td>
<td>• Encourage development which considers the existing character, form and pattern of the landscape, buildings and settlements?</td>
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<td></td>
<td>• Encourage development which incorporates green infrastructure into the design e.g. green corridors, linking open space etc.?</td>
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<tr>
<td></td>
<td>• Encourage development which incorporates sports infrastructure into the design e.g. public football pitches, mini pitches, swimming pools?</td>
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<tr>
<td>10. Material assets</td>
<td>a) To ensure that the housing stock meets the housing needs of the local people.</td>
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<td></td>
<td>• Sufficient affordable housing to meet identified needs, including the needs of the community and local economy.</td>
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<td></td>
<td>• Achieve well-designed compact communities which are developed at sufficient density to support viable local services and public transport provision and which achieve efficient use of land.</td>
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<tr>
<td></td>
<td>• Good access to facilities, particularly by public transport, walking and cycling.</td>
</tr>
<tr>
<td>SA Objective</td>
<td>Appraisal questions. Will the plan/option lead to...?</td>
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<tr>
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<tr>
<td><strong>11. Population</strong></td>
<td>• Development which delivers an appropriate mix of housing including affordable housing and appropriate housing for older people in locations close to local services/facilities.</td>
</tr>
<tr>
<td>a) To develop and maintain a balanced and sustainable population structure with good access to services and facilities.</td>
<td>• Appropriate community, social and transport infrastructure.</td>
</tr>
<tr>
<td></td>
<td>• Minimise and reduce local flood related risks to the population and the environment and adverse impacts on human health.</td>
</tr>
<tr>
<td><strong>12. Social deprivation</strong></td>
<td>• Improved provision of key services in deprived communities.</td>
</tr>
<tr>
<td>a) To reduce spatial inequalities in social opportunities.</td>
<td>• Reduced spatial inequalities in access to services including healthcare and education and local/community services.</td>
</tr>
<tr>
<td></td>
<td>• Provision of local facilities which are accessible by walking and cycling and public transport.</td>
</tr>
<tr>
<td><strong>13. Soil, geology and land use</strong></td>
<td>• The remediation of contaminated sites?</td>
</tr>
</tbody>
</table>
| a) Reduce land contamination, and safeguard soil and geological quality and quantity. | • Levels of development on brownfield sites that are above the national target of 60%?  
• Development that protects soil processes and functions?  
• Development that protects sites valued for their geological characteristics? |
| **14. Waste**                                                               | • Explicitly set out to reduce the amount of waste generated by development and land use change?  
• Explicitly encourage development to use re-cycled materials and make provision for recycling / composting in all new development?  
• Make positive provision for appropriate sites for waste management facilities including waste to energy |

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2 Note that this is no longer a national target in the NPPF. Paragraph 111 of the NPPF states that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. The sub-objective has not been changed but the appraisal, but the appraisal has just considered whether options contribute to re-use of previously developed land rather than exceeding the former national target of 60%.
### SA Objective | Appraisal questions. Will the plan/option lead to...?
--- | ---
| generation, with landfill being the least favoured option? | • Encourage the reduction in the production and movement of hazardous waste?  

### 15. Water

- **a)** Maintain and continue to improve the ecological and chemical quality of groundwater and river water-surface waters.
- **b)** Reduce risk of flooding.
- **c)** Improve efficiency of water use.
- **d)** Identify opportunities to implement strategic flood risk management options/measures to reflect the objectives in the River Nene and Great Ouse CFMPs.

- Development where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?
- Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM/EcoHomes Excellent Standard)?
- Development which supports and corresponds with PPS 25 and the flood risk management policies of the EA, the NPPF, Planning Practice Guidance and the flood risk management policies of the EA and LLFA.
- Development likely to affect the ecological and chemical status of groundwater and surface water and the ability of receiving water to accept additional flows?
- Development that results in increased spills from combined sewer outlets?
- The incorporation of the flood risk management policies set out in the River Nene CFMP and the Great Ouse CFMP?
- Safeguarding of flood storage areas identified in the Nene and Great Ouse CFMPs?
- Development which incorporates SUDS (including their long-term maintenance), to ensure there is no increase in flood risk (and where possible lead to a reduction in flood risk)?
- The sustainable use of water resources?
- The requirements of the Water Framework Directive River Basin Management Plans being met (incl. improvement of water bodies)?
- Maintain and enhance riverside and water based recreational activities (including navigation, angling, canoeing)?
2.7 Table 2.2 below lists the “SEA topics” and shows that they were all covered by at least one of the SA objectives for the West Northamptonshire Joint Core Strategy.

Table 2.2 Coverage of SEA topics by SA Objectives for the West Northamptonshire Joint Core Strategy

<table>
<thead>
<tr>
<th>SEA topic</th>
<th>SA objective covering the SEA topic</th>
</tr>
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<tbody>
<tr>
<td>Biodiversity</td>
<td>3</td>
</tr>
<tr>
<td>Population</td>
<td>11</td>
</tr>
<tr>
<td>Human Health</td>
<td>7</td>
</tr>
<tr>
<td>Fauna</td>
<td>3</td>
</tr>
<tr>
<td>Flora</td>
<td>3</td>
</tr>
<tr>
<td>Soil</td>
<td>13</td>
</tr>
<tr>
<td>Water</td>
<td>15</td>
</tr>
<tr>
<td>Air</td>
<td>1</td>
</tr>
<tr>
<td>Climatic Factors</td>
<td>6</td>
</tr>
<tr>
<td>Material Assets</td>
<td>10</td>
</tr>
<tr>
<td>Cultural Heritage</td>
<td>2</td>
</tr>
<tr>
<td>Landscape</td>
<td>9</td>
</tr>
</tbody>
</table>

2.8 In addition to the use of the SA framework to assess the potential effects of Joint Core Strategy objectives, site options and policies as they were drafted, environmental and sustainability considerations were integrated into the Joint Core Strategy through close working between Environ/LUC and the JPU officers drafting the plan. Early draft sections of the Joint Core Strategy, including draft policies, were sent to the consultants and they attended meetings to discuss the emerging plan during the process of carrying out the SA.
3 How the Environmental/SA Report has been taken into account

3.1 As stated above, the SA was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the Joint Core Strategy’s development. SA Reports were produced to describe the approach taken, the potential effects identified and put forward recommendations to avoid or minimise negative effects or enhance positive effects. JPU officers preparing the Joint Core Strategy took the SA findings and recommendations into account while making changes to the Plan before each round of public consultation.

3.2 Table 3.1 overleaf shows how preparation of the SA Reports (including the Environmental Report requirements) corresponded with each stage of the Joint Core Strategy preparation, and how any recommendations made were taken into account. In all cases, drafts of the SA Reports or addendums were provided to the JPU prior to the Joint Core Strategy documents being finalised for consultation.
### Table 3.1 Stages of Joint Core Strategy preparation and corresponding SA stages plus how the SA Report has been taken into account

<table>
<thead>
<tr>
<th>Time period</th>
<th>Plan-making stage</th>
<th>SA/SEA stage</th>
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| 2005-6      | Evidence gathering| **Scoping Report (November 2006)**
At this stage, the objectives and policies for the Joint Core Strategy had yet to be drafted and the Scoping Report did not therefore attempt to assess the likely effects of the emerging Plan; rather it determined the scope for the later stages of the SA/SEA by reviewing the relevant baseline information for West Northamptonshire, considering other relevant plans, policies and programmes and developing a set of SA objectives against which the Joint Core Strategy would be assessed. |
The SA Report appraised the options that were set out in the Issues and Options version of the Joint Core Strategy. These included a draft spatial vision and objectives as well as six high-level options for the Plan area which addressed issues such as where to focus development, design standards, prioritisation of infrastructure, affordable housing and how to build the consideration of the environment into the strategy. Further options put forward in the document and appraised in this SA report included options for the Northampton Implementation Area, Daventry, South Northamptonshire, Towcester and Brackley, Silverstone Circuit, Daventry International Rail Freight Terminal, Weedon Depot and the Rural Areas.

Section 4 of the SA Report set out recommendations that the JPU should take forward when developing the preferred options, including potential mitigation measures. It made two recommendations for strengthening the vision in relation to the sustainability of development (with reference to sustainable transport and climate change adaptation) and a number of specific recommendations in relation to the visions for Daventry and Northampton and the options for West Northamptonshire and the Northampton Implementation Area. These recommendations related to ways in which the options could be strengthened by including reference to issues such as design principles, climate change mitigation and heritage and environmental character.

The recommendations set out in the SA Report were taken into account by the JPU when developing the Emergent Draft Joint Core Strategy although some of the recommendations were no longer relevant as the parts of the Plan being referred to in the recommendations (e.g. the individual visions for Daventry and Towcester) were no longer included in the Emergent Draft version of the Joint Core Strategy. |
| 2009        | Emergent Draft    | **SA Report (July 2009)**
The SA Report appraised the Emergent Draft version of the Joint Core Strategy, in which the JPU set out which options would be taken forward and which had been rejected. The SA Report included an appraisal of both the rejected and preferred options.

Recommendations relating to the preferred options set out in the Emergent Joint Core Strategy were presented in
<table>
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<tr>
<th>Time period</th>
<th>Plan-making stage</th>
<th>SA/SEA stage</th>
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<tbody>
<tr>
<td>2011</td>
<td>Pre-Submission</td>
<td>Section 10 of the SA Report and included:</td>
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<td>- A number of recommendations for ways in which the vision and objectives could be strengthened, by adding reference to topics such as protecting biodiversity, climate change adaptation, housing types and sustainable waste management.</td>
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<td>- Recommendations relating to the spatial strategy, including additional information that should be included in the next iteration of the Plan and additional mitigation that could be incorporated in relation to issues such as biodiversity, landscape and green infrastructure.</td>
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<td>- General recommendations for the urban extensions, including mitigation or criteria that should be included in all of the policies for the urban extensions. These recommendations related to issues such as the transport strategy for each development and the need to incorporate flood risk management measures in all sites.</td>
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<td>- More specific recommendations for the urban extensions at Northampton, Daventry, Towcester and Brackley. These related to locally specific mitigation measures that should be required at the sites to minimise potential negative effects of development and address issues such as noise mitigation from nearby roads and the need for development to be sensitive to nearby open space and biodiversity sites.</td>
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<td></td>
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<td>These recommendations were taken into account by the JPU when developing the Pre-Submission Joint Core Strategy although they were not all directly addressed verbatim; for example if an issue was addressed through the introduction or strengthening of an overarching policy, it was not necessary to make specific reference to the same issue in each individual urban extension policy.</td>
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<tr>
<td>2012</td>
<td>Proposed Changes</td>
<td><strong>SA Report (February 2011)</strong></td>
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<td>The SA Report appraised the Pre-Submission version of the Joint Core Strategy, and reflected the reduced amount of development that was proposed in the Pre-Submission Joint Core Strategy in comparison to the 2009 Emergent Draft.</td>
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<td>A number of specific recommendations relating to the detailed policies in the Pre-Submission Joint Core Strategy were presented in Section 7 of the SA Report. These related to additional wording that could be added to certain policies to provide mitigation for potential negative effects relating to issues such as increases in road traffic, impacts on biodiversity and deterioration in water quality.</td>
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<td>These recommendations were taken into account by the JPU when preparing the Proposed Changes to the Pre-Submission Joint Core Strategy. In some cases, additional policy text was proposed and a new policy (BN7a) was introduced in relation to waste water infrastructure.</td>
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<td><strong>SA Report: Proposed Changes Addendum (July 2012)</strong></td>
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<td>The SA Addendum was intended to be additional to and read alongside the February 2011 SA Report and was produced to accompany the Proposed Changes to the Pre-Submission version of the Joint Core Strategy. The Proposed Changes</td>
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<tr>
<td>Time period</td>
<td>Plan-making stage</td>
<td>SA/SEA stage</td>
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<tr>
<td>2013</td>
<td>Examination</td>
<td>Updated SA Scoping Report (2013)</td>
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</table>

Prior to commencing the additional SA work that was requested by the Inspector during the initial Examination hearings, LUC prepared an updated SA Scoping Report in July 2013 to address the scope of work being carried out by the JPU to consider additional options. A full update of the SA Scoping Report was not necessary, but the July 2013 SA Scoping Report did include specific baseline information relating to the areas around the four main towns, as well as the criteria to be used for determining what were the ‘reasonable’ alternatives to be taken into consideration by the JPU. The Scoping Report was consulted upon between July and August 2013.

**SA Addendum (December 2013)**

The 2013 SA Addendum was produced at the request of the Examination Inspector. During the initial Examination hearing sessions in April 2013, the Inspector requested that the JPU undertake some additional work to assess levels of housing needs in the plan area and also to prepare a SA Addendum Report to address shortcomings in the SA work that had been undertaken previously, particularly in relation to the selection of Sustainable Urban Extension (SUE) sites. As a result of the additional work to assess levels of housing needs, Main Modifications to the Joint Core Strategy (as submitted) were proposed by the JPU and the SA of these Proposed Main Modifications was also included in the December 2013 SA Addendum.
<table>
<thead>
<tr>
<th>Time period</th>
<th>Plan-making stage</th>
<th>SA/SEA stage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>No specific recommendations were made in the December 2013 SA Addendum.</td>
</tr>
</tbody>
</table>
4 How opinions of consultation bodies and the public have been taken into account

4.1 At each stage of the Joint Core Strategy’s development, an SA Report was published alongside the Joint Core Strategy for consultation with the public and the consultation bodies specifically relating to the SEA Directive (i.e. English Heritage, Environment Agency and Natural England). The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies about the SEA have been taken into account.

4.2 The Joint Core Strategy consultation stages and responses received relating to the SA Reports are summarised below.

Issues and Options (2005-2007)

4.3 Prior to the production of the Issues and Options document, a half day consultation workshop was held in October 2005 with key stakeholder organisations. This provided an update on the plan-making process to date and a report on the context of the SA and the baseline data collected. Discussion groups were held on the proposed appraisal objectives, targets and key sustainability issues and the outcomes fed into the preparation of the SA Scoping Report. The workshop was attended by the Environment Agency, and although English Nature, the Countryside Agency and English Heritage were also invited they did not attend.

4.4 The SA Scoping Report for the Joint Core Strategy was produced by Environ in 2006 and was published for consultation between November 2006 and January 2007. A list of stakeholders who were consulted during the Scoping stage of the SA was set out in Appendix 1 of the Scoping Report – this included the three statutory consultees. The Scoping Report posed a number of questions to consultees, including whether the SA objectives in the draft SA framework provided a reasonable framework though which to address the likely significant effects of the Joint Core Strategy.

4.5 Responses to the Scoping consultation were received from all three statutory consultees, as well as a number of other stakeholders including the Wildlife Trust for Bedfordshire, Cambridgeshire, Northamptonshire and Peterborough; River Nene Regional Park; East Midlands Regional Assembly and Northamptonshire Enterprise Limited. The SA Report for the Issues and Options version of the Joint Core Strategy (2007) describes in Section 3 the nature of the Scoping consultation responses, which were generally supportive but which requested a number of amendments to the objectives in the SA framework as well as providing some additional baseline information and referring to upcoming studies and strategy documents.

4.6 As a result of those comments, the scoping report and baseline information were amended and an updated SA framework was presented in Section 3 of the SA Report for the Issues and Options version of the Joint Core Strategy (2007). The amendments included:

- further appraisal questions relating to water management and addition of reference to the setting of heritage features;
- amendments to the wording of the SA objectives relating to landscape, biodiversity, carbon emissions and climate change, supply of land, skills and infrastructure; and
- the addition of new objectives on green infrastructure, renewable energy and flood risk management.

4.7 The September 2007 SA Report was published for consultation alongside the Issues and Options version of the Joint Core Strategy between September and October 2007. Six consultation responses were received relating specifically to the SA Report. Three of these referred to the need to ensure that the SA considered flooding/ water matters (one of these was the Environment Agency who noted that the SA should use the SFRA & WCS as part of the evidence base). Two comments referred to the need for the SA to cover economic, social and environmental factors
and one referred to the need for the SA to consider the scale of growth. These comments were taken into account by Environ as it prepared the next iteration of the SA Report for the Emergent Joint Core Strategy.

**Emergent Joint Core Strategy 2007-2009**

4.8 The July 2009 SA Report was published for consultation alongside the Emergent Joint Core Strategy between July and September 2009. A number of comments referred to the SA Report, although many were not commenting on the SA process itself, rather they were referring to the findings of the SA in the context of making a wider point about the content of the Joint Core Strategy itself.

4.9 The consultation comments were taken into account by Environ as it prepared the next iteration of the SA Report for the Pre-Submission Joint Core Strategy.

**Pre-Submission Joint Core Strategy**

4.10 The February 2011 SA Report was published for consultation alongside the Pre-Submission Joint Core Strategy between February and March 2011. Again, many of the consultation responses that referred to the SA Report did so in the context of comments about the content of the Joint Core Strategy itself.

4.11 The consultation comments were taken into account by Environ as it undertook further SA work in relation to the Proposed Changes to the Pre-Submission Joint Core Strategy.

**Proposed Changes to the Pre-Submission Joint Core Strategy**

4.12 The July 2012 SA Addendum for the Proposed Changes to the Pre-Submission Joint Core Strategy was published for consultation alongside the Proposed Changes between July and September 2012. Responses received during this consultation were forwarded to the Inspector for his consideration.

**Examination**

4.13 The Inspector’s Issues and Questions for Discussion at the Examination in Public Hearing Sessions included one relating to the Sustainability Appraisal. The Inspector posed the following question under the Strategy/Vision/Objectives session on the first day of the hearings:

- Has the JCS been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA], strategic environmental assessment [SEA] and an appropriate assessment [AA] and if not, what else needs to be done?

4.14 Representors to the Joint Core Strategy submitted Statements to the Examination prior to the Hearing Sessions, a number of which referred to the Sustainability Appraisal both in terms of potential flaws in the way it was undertaken or its findings, or to support their objections to the Plan.

4.15 During the Examination hearing sessions for the Joint Core Strategy in April 2013, the Inspector requested that the JPU undertake a fresh assessment of objectively assessed housing needs for the Plan area, and that a SA/SEA Addendum Report be prepared to address shortcomings in the SA work undertaken to date, particularly in relation to the selection of Sustainable Urban Extension (SUE) sites in relation to the reassessed housing needs.

**Updated Scoping Report for the SA Addendum**

4.16 An updated SA Scoping Report was consulted upon between 22nd July and 30th August 2013. The Scoping Report related specifically to the additional SA work to be undertaken and did not represent a full update to the 2006 Scoping Report.

4.17 The consultation responses received from the statutory consultees in relation to the updated Scoping Report are summarised in Appendix 1 of the 2013 SA Addendum along with an explanation of how and where they have been addressed.

4.18 Comments included recommendations for amendments to the baseline information, SA objectives and assumptions to be used in the appraisal. Several of the comments were observations and did
not require any action to address them, while a number of others were not addressed for the reasons described in the 2013 SA Addendum – for example, where suggested changes to the SA objectives were not considered to be appropriate because they would result in a certain issue being addressed by more than one SA objective.

**SA Addendum for the Joint Core Strategy, including SA of Main Modifications**

4.19 The December 2013 SA Addendum for the Joint Core Strategy was published for consultation alongside the Main Modifications between January and February 2014. A large number of consultation responses were received from stakeholders and these were taken into account by the JPU as it prepared updated position statements in advance of the resumed examination hearings. The consultation comments were also published in full on the JPU’s website.
Why the adopted Joint Core Strategy was chosen in light of reasonable alternatives

5.1 Chapter 3 of the 2011 SA Report for the Pre-Submission Joint Core Strategy summarises the options that were considered at each stage of the Joint Core Strategy’s preparation, and Appendices B, C and D of the same SA report set out the potential sustainability effects of all of those options. This information was then supplemented by the SA Addendums that were produced in 2012 and 2013, as summarised below.

Issues and Options (2007)

5.2 The Issues and Options document identified the key spatial planning issues for West Northamptonshire and developed alternative options to address those issues. The alternative options were taken from the evidence base and the feedback from consultation. The Issues and Options document contained a draft spatial vision, themes and spatial objectives and it contained various options for each area as follows:

- West Northamptonshire;
- Northampton;
- Daventry;
- South Northamptonshire;
- Towcester;
- Brackley;
- Silverstone Circuit;
- Daventry International Rail Freight Terminal;
- Weedon Depot; and
- Rural Areas.

5.3 These options were subject to SA and the findings presented in the 2007 SA Report for the Issues and Options. Section 4 of that document set out recommendations that the Councils should take forward when developing the preferred options, including potential mitigation measures. These recommendations, as well as the sustainability strengths and weaknesses, were taken into account by the JPU when developing the Emergent Draft version of the Joint Core Strategy.

Emergent Draft Core Strategy (2009)

5.4 The alternative strategies considered within the Emergent Joint Core Strategy examined the distribution of development in West Northamptonshire. In addition to the accommodation of development within the existing urban areas, the two main options to accommodate the levels of growth set in the East Midlands Regional Plan were identified as:

- Option A: development distributed widely around the edges of the urban areas in many locations where development is found to be feasible.
- Option B: development focused in a small number of large development areas.

5.5 In addition, various area-specific options were described but rejected within the Emergent Joint Core Strategy, as it was considered that these did not meet the vision and objectives for the Joint Core Strategy. These options were tested through the SA, to ensure that there was no risk that potential alternatives were overlooked. The rejected options were as follows:

- Northampton options: option 2 (Northampton East) was rejected. The SA identified the potential for adverse impact on the Upper Nene Valley Gravel pSPA and pRamsar site, and the
option 2 area contained a concentration of archaeology and cultural heritage assets. Option 5 (south of the M1 and South West) was also rejected because it was located beyond the physical barrier of the M1 motorway, which would conflict with the desire to provide good linkages between existing and new communities and impact upon the character of Northampton.

- Daventry options: option 1 (Daventry East), option 2 (Daventry West), option 3 (Daventry North West) and option 7 (Daventry South) were rejected. The SA identified the potential for options 2 and 3 to adversely affect the Braunston Marshes County Wildlife Site, as well as sensitive archaeology and cultural heritage areas in proximity to the option 1 area. Option 7 was rejected because there was a County Wildlife Site and an area of Ancient woodland, limiting the potential development area. It was also considered that development in this location would be highly visible and large areas within the site were identified as being of unstable geology, where development should be avoided.

- Towcester options: options 2 (Towcester West), 3 (Towcester North West), 5 (Towcester Racecourse), 6 (Towcester North), 7 (Towcester to Silverstone Lung) and 8 (East of Silverstone Lung) were rejected. The SA identified that option 5 would result in the loss of Towcester racecourse, which is a cultural asset to the town, and options 3, 5 and 6 were in areas of high landscape sensitivity. Option 8 would impact upon an area of wet woodland, and option 6 upon an area of potential wildlife site. Option 2 was rejected because the A43 would be a barrier between the site and Towcester town and the River Tove corridor and flood plain would limit the development potential of the site. Option 7 was rejected because of its distance from Towcester town centre.

- Brackley options: option 1 (Brackley South) was rejected. The SA found that it could affect Evenley Conservation Area and Evenley Park (an unregistered park and garden), and it was remote from the town making it difficult to provide adequate community facilities.

5.6 Recommendations relating to the preferred options set out in the Emergent Joint Core Strategy were presented in Section 10 of the 2009 SA Report. These recommendations, as well as the sustainability strengths and weaknesses, were taken into account by the JPU when developing the Pre-Submission version of the Joint Core Strategy.

**Pre-Submission (2011)**

5.7 The Pre-Submission Joint Core Strategy described the spatial strategy of concentrating development within the existing towns in sustainable urban extensions. Piecemeal development was not considered a sustainable option as this type of development would increase the load to the current infrastructure, without bringing forward the economies of scale that would make the provision of further infrastructure cost effective and therefore deliverable. Such incremental development was considered to be more difficult to serve with the range of community facilities needed to support the increase in population. Consequently, the spatial strategy was one of concentrating additional development within the existing towns as far as possible and in a small number of large development areas, called sustainable urban extensions.

5.8 The Pre-Submission Joint Core Strategy also set out the amount of housing that was needed, explaining that the economic situation had resulted in the levels of housing in the Regional Plan (and the Emergent Joint Core Strategy) as unachievable.

5.9 Justification was also provided in the Pre-Submission Joint Core Strategy for the selection of the SUEs. The choices of the sustainable urban extensions being taken forward also took account of the findings of the SA and Appropriate Assessment (AA) produced for the Emergent Joint Core Strategy and the results of community consultation. The results demonstrated that there were significant environmental constraints (particularly for the Northampton South East sustainable urban extension) and the accompanying infrastructure. In the case of Daventry, since the publication of the Emergent Joint Core Strategy, a planning application appeal had been heard and permission had been granted for residential and associated development at a site known as Monksmoor (north of Daventry Reservoir). This option met Daventry’s local needs and performed well in the SA. The Daventry North East SUE was also included in the Pre-Submission version of the JCS. With regard to Towcester and Brackley, the options remained largely unchanged.
5.10 The Pre-Submission version of the Joint Core Strategy was subject to SA, with the findings presented in the 2011 SA Report for the Pre-Submission Joint Core Strategy. The findings and recommendations were taken into account by the JPU as it compiled a set of Proposed Changes to the Joint Core Strategy.

Proposed Changes (2012)

5.11 Following the formal stage of consultation on the Pre-Submission in light of the representations received and changes to national planning policy the Joint Strategic Planning Committee recommended further changes be made to the Pre-Submission Joint Core Strategy. These 'Proposed Changes' were considered necessary to ensure the Strategy was sound.

5.12 The vast majority of the changes were made to factually update the plan or to correct minor drafting errors and these were termed minor changes. The more significant changes included amendments to the spatial strategy to update the housing, retail floorspace capacity and employment figures – the revised housing figure took account of new planning consents since the Pre-Submission version and the job number increased from 16,000 to 19,000 (see below). Retail floorspace capacity was reduced largely due to a reduction in available spending. Other proposed changes included a new JCS objective relating to the need to conserve and enhance heritage assets, rewording of the Pre-Submission JCS Policy on Sustainable Development Principles (Policy S10), the addition of further detail about the delivery of improvements to the A45 between Junction 15 of the M1 and the Great Billing Junction at Northampton. The increased job number was proposed in order to ensure that a range of jobs are provided and to acknowledge that although Northamptonshire had remained reasonably resilient to the recent economic downturn, some jobs had been lost.

Additional SA work and Main Modifications (2013)

Additional SA work

5.13 Following the initial examination hearings, LUC undertook some additional SA work on behalf of the JPU as requested by the Inspector. This involved six main components of work:

1 Appraisal of reasonable alternatives for the quantum of housing and jobs arising from the objective assessment of need described in the JPU’s report Objectively Assessed Housing Needs V2 (December 2013).

2 Appraisal of reasonable alternatives for the overall spatial distribution of development within the plan area, and consideration of one or more locations for a new settlement.

3 Appraisal of reasonable alternatives for the spatial distribution of development at the town level, which concerns how much development should be directed to each town and where, including consideration of the alternative spatial distribution proposed by Northamptonshire County Council.

4 Appraisal of the JPU’s Preferred Choice and reasonable alternatives for the SUE allocations.

5 Appraisal of reasonable alternatives for strategic employment sites.

6 Appraisal of the Main Modifications proposed for the Joint Core Strategy.

5.14 The alternatives considered under each component are summarised below, along with the reasons for selecting or rejecting each option.

1. Quantum of housing and jobs

5.15 Three options for the quantum of housing and jobs were identified by the WNJPU as requiring appraisal, on the basis of the JPU’s report on Objectively Assessed Housing Needs:

- Option 1 – Cambridge Tracking: This option assumed the delivery of 41,760 net additional dwellings and 28,520 net additional jobs over the period 2011-2029 in accordance with the Proposed Main Modifications to the JCS.

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• Option 2 – ONS 2011 Extended (reduced phasing): This option assumed the delivery of 36,972 net additional dwellings and 26,849 net additional jobs over the period 2011-2029 in accordance with the Proposed Main Modifications to the JCS, but with a slower rate of delivery.

• Option 3 – ONS 2011 Extended (reduced SUEs): This option assumed the delivery of 36,972 net additional dwellings and 26,849 net additional jobs over the period 2011-2029 in accordance with the Proposed Main Modifications to the JCS, but with the deletion of between two and five SUEs (unspecified).

5.16 The purpose of this work was to assess the reasonable alternatives for the quantum of housing and jobs against the SA framework and to record this assessment in a clear and transparent way. The JPU selected the Cambridge Tracking (Option 1) as the preferred alternative to act as the basis of the Proposed Main Modifications to the Joint Core Strategy, because it was the alternative that the JPU was most confident in placing reliance upon with respect to methodology, taking into account the requirements of the NPPF. The JPU rejected the ONS 2011 Extended reasonable alternative (which formed the basis of Options 2 and 3), since it was less confident that it would pass the NPPF test of Objectively Assessed Housing Need, compared to the Cambridge Tracking alternative.

2. Overall spatial distribution of development

5.17 This component of work focused on three options:

• Option A – distributing growth widely around the edges of the urban areas in many locations where development is found to be feasible.

• Option B – focusing growth in a small number of larger development areas.

• Option C – new settlements in sustainable locations including brownfield land in the countryside.

5.18 Options A and B were already assessed in 2009 by Environ for the SA of the Emergent Joint Core Strategy. This assessment was recorded in the Draft Sustainability Appraisal Report of the EJCS as Option 1 and Option 2, and did not need to be updated. Therefore, the additional sustainability appraisal work considered Option C and whether the reasons for choosing Option B remain valid in the light of the selected quantum option.

5.19 Following the SA of the reasonable alternative new settlement options, the JPU undertook a wider planning assessment of whether each new settlement option should be included in the Joint Core Strategy or not. This involved considering whether the new settlement option complied with the Joint Core Strategy Vision, Objectives and overarching policy S1, taking the SA findings into account, as well as other deliverability issues. The JPU Planning Assessment was set out in a separate document: "Site Selection Report" (December 2013), and a summary of the JPU’s conclusions regarding whether to select or reject each of the new settlement options from further consideration was provided at the end of Appendix 4 in the 2013 SA Addendum.

3. SUE distribution around the four main towns

5.20 The purpose of this component of work was to reconsider alternative locations for the distribution of Sustainable Urban Extensions at each of the towns of Northampton, Daventry, Towcester and Brackley and consider whether they are ‘reasonable’ alternatives (i.e. taking into account the objectives and Policy S1 of the West Northamptonshire Joint Core Strategy, as set out in the Pre-Submission Joint Core Strategy and amended by the Proposed Changes, as well as deliverability within the Plan period), and to document this decision-making. Each reasonable alternative was appraised against the SA framework drawing on the earlier SA work where appropriate but also including alternatives that had not been appraised to date where they met the ‘reasonableness’ test.

5.21 Alongside the SA of the reasonable alternative SUE locations around each of the four main towns, the JPU undertook a wider planning assessment of whether each SUE location should be allocated in the JCS or not. This involved considering whether the SUE location complied with the JCS Vision, Objectives and overarching Policy S1, taking the SA and Habitats Regulations Assessment (HRA) findings into account, as well as other deliverability issues such as whether the site is
available and any infrastructure requirements. The JPU Planning Assessment was set out in the “Site Selection Report” (December 2013).

5.22 The JPU considered the findings from all the above work in order to develop its revised preferred approach. For Daventry, Towcester and Brackley, the JPU’s preferred approach did not change from the SUEs allocated already in the JCS as submitted. For Northampton, the JPU considered whether there were options for distributing the development by proposing more or less housing at some of the currently allocated SUEs, as well as allocating additional SUEs. The JPU concluded on the basis of the SA work undertaken under Task 3 above and other technical work, that such alternatives should be rejected.

4. Preferred and alternative SUE allocations

5.23 In order to test its revised preferred approach, the JPU decided that the sustainability effects of the revised preferred approach needed to be appraised in more detail and then compared with an appraisal of the current distribution of SUEs as allocated in the JCS as submitted. A third option was also subject to appraisal, being the alternative spatial distribution proposed by Northamptonshire County Council:

- Northamptonshire County Council proposes within the same total amount of development identified in the Pre-Submission Joint Core Strategy for the Northampton Related Development Area:
  - Deletion of the Northampton West Sustainable Urban Extension (Policy N4);
  - Deletion of the Northampton South Sustainable Urban Extension (Policy N5); and
  - Enlargement of the Northampton North Sustainable Urban Extension (Policy N3).

5. Appraisal of reasonable alternatives for strategic employment sites

5.24 In addition to the SUE alternative locations appraised, a number of alternative strategic employment site locations were also appraised as these sites had been promoted by stakeholders during the Examination hearing sessions in April 2013.

5.25 Following the SA of the reasonable alternative employment site options, the JPU undertook a wider planning assessment of whether each site should be included in the Joint Core Strategy or not. This involved considering whether the employment site options complies with the Joint Core Strategy Vision, Objectives and overarching policy S1, taking the SA findings into account, as well as other deliverability issues such as whether the site is available and any infrastructure requirements. The JPU Planning Assessment was set out in the separate document: “Site Selection Report” (December 2013) and a summary of the JPU’s conclusions regarding whether to select or reject each employment site option from further consideration was provided at the end of Appendix 13 in the 2013 SA Addendum.

6. Main Modifications

5.26 Proposed Main Modifications to the JCS as submitted were prepared by the JPU. These set out changes identified before, during and soon after the Examination Hearings in April and May 2013 as well as changes which had resulted from the Objectively Assessed Housing Needs and the additional SA work described above. The proposed Main Modifications were shown in a schedule as further changes to the JCS as submitted. The 2013 SA Addendum described whether or not any of the proposed Main Modifications to the JCS changed the findings set out in the previous SA Reports (2011 and the 2012 SA Addendum).
6 How will the environmental and sustainability effects of the Joint Core Strategy be monitored?

6.1 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" (Regulation 17), and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring" (Schedule 2).

6.2 The Government’s latest SA Guidance\(^4\) states that details of the proposals for monitoring the significant effects of implementing the adopted local plan should be included in the Sustainability Appraisal report, or the post-adoption statement (i.e. this document). Chapter 8 of the February 2011 SA Report for the Pre-Submission Joint Core Strategy addressed this requirement, presenting a draft monitoring framework and stating that the final SA monitoring programme would be included in the Updated Final SA Report (which was at that time intended to be published with the Submission Draft Joint Core Strategy). The draft monitoring framework presented monitoring proposals for the likely significant effects identified in the SA. It took the approach of identifying the Joint Core Strategy policies likely to have a significant effect and the nature of the likely significant effect, rather than focussing on the SA objectives for which likely significant effects were identified.

6.3 The 2013 SA Addendum for the Main Modifications to the Joint Core Strategy included a summary of the likely significant effects identified through that work which would also need to be monitored. These were:

- Effects on noise and air quality associated with Northampton South SUE, development within the Northampton urban area, and Junction 16 strategic and DIRFT employment sites.
- Effects on cultural heritage associated with the SUEs at Northampton South of Brackmills, Northampton North of Whitehills, Northampton Upton Park, Northampton Upton Lodge/Norwood Farm, Daventry North East, and from development within the urban area at Northampton.
- Effects on biodiversity, flora and fauna at virtually all the SUEs, and the DIRFT strategic employment site.
- Effects on access to educational facilities for virtually all the SUEs and from development within the urban area of Northampton.
- Effects on health including access to health facilities at virtually all the SUEs and from development within the urban area of Northampton.
- Effects on employment land take-up and job creation of SUEs at Northampton North, Northampton Kings Heath SUE, Brackley East, Towcester South East, development within the urban area of Northampton, and at the two strategic employment sites.
- Effects on the landscape from development at virtually all the SUEs, the Junction 16 strategic employment site, and the significant positive effects identified from development in the urban area of Northampton.
- Effects on objectively assessed housing needs and community facilities and service provision at all the SUEs, and from development in the urban area of Northampton.

\(^4\) http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/
• Effects on loss of best and most versatile agricultural land at Northampton North SUE, and Daventry North East SUE, and effects on land stability at Daventry North East SUE.
• Effects on flood risk from development within the urban area of Northampton.

6.4 The SA Addendum recommended that a comprehensive combined monitoring framework for the Joint Core Strategy should be included in the SA Adoption Statement. Therefore this section sets out the detailed monitoring proposals for the Joint Core Strategy.

6.5 Table 6.1 below sets out proposed monitoring indicators relating to each of the SA objectives for which potential significant effects were identified through the SA of the Joint Core Strategy. By monitoring the effects of the Joint Core Strategy on the SA objectives, rather than focusing on the specific likely significant effects identified through the SA, other significant effects which may not have been anticipated will be able to be monitored. Therefore, monitoring indicators are suggested for all of the objectives in the SA framework.

6.6 To achieve efficiencies, and ensure environmental effects of implementing any of the Joint Core Strategy measures are monitored, SA monitoring of the Joint Core Strategy should be conducted as part of the overall approach to monitoring achievement of the Joint Core Strategy objectives. Appendix 6 of the Joint Core Strategy presents a Monitoring and Implementation Framework, which will be used to record and assess the implementation of the Joint Core Strategy. That framework includes significant effects indicators, which were developed from the SA objectives and check the effects of policies designed to meet these objectives, including whether the effects on the area are as intended (bringing a positive change). Therefore, the indicators in Table 6.1 draw from those indicators as appropriate.

Table 6.1 SA monitoring recommendations for the West Northamptonshire Joint Core Strategy

<table>
<thead>
<tr>
<th>SA objectives for which likely significant effects were identified</th>
<th>Suggested indicators (or sources for indicators)</th>
</tr>
</thead>
</table>
| 1. Air Quality and Noise                                      | • Number of Air Quality Management Areas declared in West Northamptonshire.  
• NO2 Levels at existing designated AQMAs.                     |
| 2. Archaeology and cultural heritage                          | • Additions and losses of cultural heritage designations in West Northamptonshire.  
• Number/percentage of designated assets identified as being ‘at risk’ in West Northamptonshire. |
| 3. Biodiversity, flora and fauna                              | • Changes in areas and populations of biodiversity importance.  
• % of SSSIs in Favourable or Unfavourable Recovering condition. 
• Achievement of BAP targets.                                   |
| 4. Crime and community safety                                 | • Crime levels in West Northamptonshire.                                                   |
| 5. Education and training                                    | • The number of persons not in education, employment or training (NEETs).  
• % of pupils obtaining Level 2 or higher qualification.        
• Indices of Education, Skills and Training Deprivation.       
• Number of new schools.                                       |
| 6. Energy and climatic factors                               | • Renewable energy capacity installed by type.  
• CO2 emissions by source.                                     
• GWh of installed low/ zero carbon energy.                    
• Renewable energy capacity installed by type.                  |
| 7. Health and wellbeing                                      | • Life expectancy.                                                                         
• Proportion of the population aged over 85.                    
• % of people classifying themselves as having good health.     
• Obesity rates.                                                |
<table>
<thead>
<tr>
<th>SA objectives for which likely significant effects were identified</th>
<th>Suggested indicators (or sources for indicators)</th>
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<tbody>
<tr>
<td>8. Labour market and economy</td>
<td>• Job-Seekers Allowance (JSA) claimant rate by ward.</td>
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<td></td>
<td>• Unemployment Rate.</td>
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<tr>
<td></td>
<td>• Amount of new employment floorspace by type.</td>
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<td></td>
<td>• Employment land available by type.</td>
</tr>
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<td></td>
<td>• Net job growth.</td>
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<tr>
<td>9. Landscape and townscape</td>
<td>• Proportion of new development built on previously developed land.</td>
</tr>
<tr>
<td>10. Material assets</td>
<td>• Net additional Gypsy and Traveller pitches.</td>
</tr>
<tr>
<td></td>
<td>• Number of people on social housing waiting lists.</td>
</tr>
<tr>
<td></td>
<td>• Number and tenure type of existing housing stock.</td>
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<tr>
<td></td>
<td>• Gross affordable housing completions.</td>
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<tr>
<td></td>
<td>• % of Housing meeting Building for Life Assessment.</td>
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<tr>
<td>12. Social deprivation</td>
<td>• Amount of new residential development within 30 minutes public transport time of recreational and cultural facilities (including pubs, shops, community facilities, open/greenspaces, playing fields and footpaths and cycle routes).</td>
</tr>
<tr>
<td>13. Soil, geology and land use</td>
<td>• % of new housing/employment development on areas of Grades 1, 2 or 3a agricultural land.</td>
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<td></td>
<td>• % of new and converted dwellings on previously developed land.</td>
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<tr>
<td>14. Waste</td>
<td>• % of household waste sent for re-use, recycling and compost.</td>
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<td></td>
<td>• % of Construction and demolition waste re-used.</td>
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<tr>
<td>15. Water</td>
<td>• Water stress.</td>
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<td></td>
<td>• Chemical and biological quality of rivers and lakes.</td>
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<tr>
<td></td>
<td>• CAMS river status (over licenced, water available etc.)</td>
</tr>
<tr>
<td></td>
<td>• Planning permissions granted contrary to EA advice on water quality or flood risk grounds after failing the sequential and/ or exceptions test.</td>
</tr>
</tbody>
</table>
7 Habitats Regulations Assessment

7.1 As described in Section 1, the Joint Core Strategy was subject to HRA throughout its preparation. The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010\(^5\) and again in 2012\(^6\). The purpose of the HRA is to determine whether the plan will have adverse effects on the integrity of the European sites in and around West Northamptonshire. As with the SA, the HRA work was undertaken by consultants on behalf of the JPU.

7.2 This section summarises the approach that was taken to the HRA, including the consultation that was carried out.

**HRA work undertaken**

**Issues and Options (2007)**

7.3 An HRA screening exercise was undertaken for the Joint Core Strategy Issues and Options Discussion Paper in 2007 by Treweek Environmental Consultants on behalf of the JPU. The screening exercise identified that the Joint Core Strategy could result in likely significant effects on European sites and therefore a full Appropriate Assessment was needed. The European sites which could be subject to likely significant effects were Rutland Water SPA and Ramsar site and Upper Nene Valley Gravel Pits SPA and Ramsar site\(^7\) and these were ‘screened in’ to the HRA. Other European sites considered in this and subsequent HRA screening exercises were Portholme SAC, Oxford Meadows SAC, and Ensor’s Pool SAC.

7.4 During the preparation of the HRA Screening Report, consultation was carried out with Natural England (as the statutory nature conservation body) to confirm sites and issues to be addressed and to review the methodology and approach.

7.5 The HRA Report was published for consultation alongside the Issues and Options version of the Joint Core Strategy between September and October 2007.

**Emergent Joint Core Strategy (2009)**

7.6 The next iteration of the Joint Core Strategy, the ‘Emergent’ Joint Core Strategy, was subject to HRA in 2009 by Environ on behalf of the JPU. The Emergent Joint Core Strategy presented some new options which had not been considered at the screening stage and therefore it was necessary to ‘re-screen’ that version of the plan to confirm the European sites which needed to be considered in the HRA. The re-screening exercise concluded that in line with the original screening report, the European sites that needed to be considered in the HRA were Rutland Water SPA and Ramsar site and Upper Nene Valley Gravel Pits SPA and Ramsar site.

7.7 The Emergent Joint Core Strategy was then assessed to identify potential adverse effects on the integrity of these two European sites and the results consulted on alongside the Emergent Joint Core Strategy, including with Natural England. A number of potential adverse effects on the integrity of Rutland Water SPA and Ramsar site and Upper Nene Valley Gravel Pits SPA and Ramsar site were identified. Natural England confirmed that it was happy with the information that the HRA presented and the impact avoidance measures put forward to address the potential adverse effects identified in the HRA.

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\(^5\) The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version.


\(^7\) Upper Nene Valley Gravel Pits was classed as a Potential SPA (pSPA) and Proposed Ramsar (pRamsar) site until April 2011 when it was formally designated. The requirements for Habitats Regulations Assessment are the same for formally proposed sites as for fully designated sites.
7.8 One of the measures recommended in the HRA of the Emergent Joint Core Strategy was to undertake survey work in the vicinity of the Clifford Hill Gravel Pits to inform the avoidance and mitigation measures required. Clifford Hill Gravel Pits is the component of the Upper Nene Valley Gravel Pits European site which lies closest to Northampton and which performs a key role in the functioning of the site. The scope of the survey work was agreed with Natural England and survey work undertaken during 2009 and 2010 to provide data for the HRA of the Pre-Submission Joint Core Strategy.

7.9 The HRA Report for the Emergent Draft Joint Core Strategy was published for consultation alongside the Joint Core Strategy between July and September 2009.

Pre-Submission Joint Core Strategy (2011)

7.10 The HRA of the Pre-Submission Joint Core Strategy was published in 2011. A re-screening of the Joint Core Strategy policies confirmed that likely significant effects existed in relation to Upper Nene Valley Gravel Pits SPA and Ramsar Site whilst likely significant effects on Rutland Water SPA and Ramsar site were able to be screened out. No likely significant effects were identified for any other European sites.

7.11 Changes to the Joint Core Strategy since the Emergent stage and addition of further mitigation recommended by the HRA of the Pre-Submission Joint Core Strategy allowed a conclusion of no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site.

Proposed Changes (2012)

7.12 The HRA report was published for comment alongside the Pre-Submission Joint Core Strategy between February and March 2011.

7.13 Following consultation on the Pre-Submission Joint Core Strategy and accompanying HRA Report, the JPU published Proposed Changes to the JCS in July 2012. These were subject to HRA screening and the results published as an addendum to the HRA of the Pre-Submission Joint Core Strategy. The HRA Screening of the Proposed Changes to the Pre-Submission Joint Core Strategy did not identify any likely significant effects on any European site and no previously recommended impact avoidance measures were outstanding. It was therefore concluded that the Proposed Changes to the Pre-Submission Joint Core Strategy would not result in adverse effects on the integrity of any European site. Although not necessary to support this conclusion, two recommendations to improve the JCS in light of the HRA were made at that stage:

- "Appendix 4: For completeness and in order to ensure impacts on European sites are considered it is suggested that the wording is amended to include a clause specifying that all developments will need to be in compliance with the Habitats Regulations."

- "Policy BN7a could be strengthened so that it is consistent with the supporting text which directly references the Upper Nene Valley Gravel Pit SPA "New developments will need to have the necessary means of water supply but this must not affect the water levels at the Upper Nene Valley Gravel Pits Special Protection Area (SPA) or overall water quality"."

7.14 The HRA Addendum was published for comment alongside the Proposed Changes to the Pre-Submission Joint Core Strategy between July and September 2012.

Main Modifications (2013)

7.15 The Proposed Main Modifications were reviewed to determine whether any of them could give rise to likely significant effects on any European site other than the two sites for which likely significant effects were identified by the HRA of the Pre-Submission Joint Core Strategy, namely Rutland Water SPA and Ramsar site and Upper Nene Valley Gravel Pits SPA and Ramsar site. The result of this exercise was that no likely significant effect on any additional European site was identified and the scope of the HRA of the Pre-Submission Joint Core Strategy remained valid.

7.16 The HRA screening then considered each Proposed Main Modification to determine whether it could give rise to likely significant effects other than those already assessed in the HRA of the Pre-Submission Joint Core Strategy, as amended by the HRA Addendum for the Proposed Changes. The result of the HRA Screening was that likely significant effects could not be ruled out for Rutland Water SPA and Ramsar site in relation to water supply and water levels and for Upper...
Nene Valley Gravel Pits SPA and Ramsar site in relation to loss of supporting habitat, water supply and water levels, water quality and disturbance.

7.17 However, more detailed Appropriate Assessment of these effects did not identify any adverse effects on the integrity of either of these European sites. No impact avoidance measures put forward by the preceding HRA work remained outstanding. The overall conclusion of the HRA of the Pre-Submission Joint Core Strategy, as amended by the HRA Addendum for the Proposed Changes to the Joint Core Strategy, therefore remained valid and it was therefore possible to conclude that the Joint Core Strategy, as amended by the Proposed Main Modifications, would not result in adverse effects on the integrity of any European site.

7.18 Although not necessary to support this conclusion, LUC supported the following recommendation of the previous HRA work and recommended that it be incorporated within the modifications to the JCS:

- Policy BN7a could be strengthened so that it is consistent with the supporting text which directly references the Upper Nene Valley Gravel Pit SPA “New developments will need to have the necessary means of water supply but this must not affect the water levels at the Upper Nene Valley Gravel Pits Special Protection Area (SPA) or overall water quality”.

7.19 The 2013 HRA Addendum for the Main Modifications was published for consultation alongside the Main Modifications between January and February 2014.

LUC
December 2014