Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
   General Comments on the Plan

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

Justified
Effective
Positively prepared
Consistent with National Policy

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.

The County Council welcomes the emphasis in the Plan on delivering key infrastructure in order to support growth during the Plan period, as set out in the Infrastructure Delivery Schedule. Ongoing collaboration on the IDS between partners will be required to ensure it is regularly reviewed and updated.

The County Council supports the recognition in Section 14 of the vital role of infrastructure in supporting delivery of the Plan. This must be supported through the appropriate use of planning obligations in delivering key infrastructure, and acknowledgement of the County Council's adopted Planning Obligations Framework and Guidance, in order to provide clarity to local authorities, developers and communities as to what level of developer contributions may be expected of new developments.
It is noted that the Plan identifies a number of additional potential sites for housing allocations across both the urban and rural areas, in order to meet the target established within the North Northamptonshire Joint Core Strategy (JCS), to provide a suitable land supply buffer, and in order to address an historic shortfall in delivery. Ongoing consultation with the county council will therefore be required to ensure that infrastructure, including Education infrastructure, is appropriately planned for and delivered to meet the continued needs of growth and to support delivery of any strategic developments.

In accordance with the county council’s adopted Planning Obligations Framework, all planning applications for major development (ie applications for more than 10 units) will be assessed for their impact on County Council-led infrastructure, and Section 106 obligations where appropriate will be required in order to mitigate the impact of housing growth on existing services and facilities.

Education Infrastructure and Facilities
1. As the Local Education Authority for the county of Northamptonshire, the County Council has a statutory responsibility for ensuring the sufficiency of provision for all pupils of school age across Early Years, Primary, Secondary and Sixth-form Education, as well as pupils with Special Educational Needs & Disabilities.

2. It is the County Council’s role to plan, commission and organise school places in a way that promotes the raising of standards, manages supply and demand, and creates a diverse infrastructure. The County Council’s ‘School Organisation Plan 2016-2021 – Local Places for Local Children’ (SOP) provides the framework for meeting these objectives, providing accommodation for school places that is high quality, fit for purpose, provides value for money and ensures flexibility to respond to changes in need.

3. The SOP has recently been updated for the period 2018-2023, and its evidence base and strategic priorities, should at all stages inform the strategic direction for provision of Education Infrastructure across the county. ‘Planning for Schools Development (2011)’ a joint policy document prepared by the Secretary of State for Education and Secretary of State for Communities and Local Government, sets out the Government’s commitments to planning and delivery of state-funded schools and should also be taken into account in supporting the implementation of the policies in the Plan.

4. New housing development creates additional demand for existing and new education provision. Across Northamptonshire 80,000 additional new homes are expected to be built by 2031. These are likely to lead to approximately 24,000 additional Primary aged pupils and 16,000 Secondary and Sixth Form pupils.

5. The recently published ‘Securing developer contributions for education (April 2019)’ sets out the best practice guidance for local authorities and developers when considering the impact of new housing on education infrastructure and firmly establishes Government’s expectation that developer contributions are fundamental to contributing towards school places required as a direct result of new housing development.

6. Since 2010, the County Council has invested £230m in the schools estate in Northamptonshire; its Capital Strategy 2018-23 identifies a further £360m of investment that is required to meet the anticipated demand for school places in the county and ensure that the County Council continues to meet its statutory obligations.

7. A number of new schools have been identified as required for the Kettering area in the period to 2031. This new provision relates largely to the specific demand generated by new housing delivery coming forward throughout the plan period, however there is also an urgent identified need to provide additional capacity at Secondary Education level in the interim, to meet the existing demand in the borough arising as a result of significant population growth and housing development to date, and proposals are currently being progressed to deliver these, including extensions to existing schools. The County Council will work with the local authority and with the ESFA to bring these forward.

8. The new housing allocations proposed throughout the Plan are therefore expected to place an increased pressure on Education infrastructure and provision in the across the Kettering borough area. In some instances, this may require additional facilities and infrastructure to be delivered, however the County Council will continue to monitor capacity and pupil generation forecasts across the existing schools estate, and assess the ability of these to adapt, expand and/or enhance existing provision where possible to mitigate the impact of development. In circumstances where existing schools are unable to expand on their current sites (for example due to constrained boundaries or ground conditions), then alternative sites may need to be identified for relocation or additional provision. In addition, planning
obligations towards school transport may be required from new development when located in areas unable to accommodate the increased demand. This will be assessed on a case by case basis.

9. The County Council remains committed to working closely with all interested parties, to ensure that capacity across these areas can be monitored and delivered, in order to meet the statutory obligations of the County Council to provide sufficiency of school places.

Fire and Rescue

10. Northamptonshire Fire and Rescue Service (NFRS) has identified that new developments and associated infrastructure within Northamptonshire equates to an increase in population as well as traffic movements. This will inevitably lead to an increase in the spread of community risk which places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance.

11. NFRS sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within its statutory responsibilities under the Fire and Rescue Services Act 2004. The projected collective growth of the county will impact on the Service’s ability to maintain Standards of Operational Response. For example:

12. Increased community risk from fire: It is important to note that fire and rescue service provision is made on the basis of mitigating risk. In this regard, national and local statistics show that residential properties pose the highest risk to life from fire related incidents. Initial target attendance times for life risk incidents have been agreed at 8 minutes from time of call to arrival at scene on 75% of occasions, and it is this target that the county needs to maintain going forward.

13. Increased community risk from road traffic collisions (RTC): Under the Fire and Rescue Services Act 2004, Northamptonshire Fire and Rescue Service have a statutory responsibility to respond to Road Traffic Collisions (RTCs).

14. The impact of growth on NFRS is not limited to that within actual residential and commercial developments. Additional growth will create an increase in vehicles and traffic movements that will lead to an increase in risk and activity for the Service. Coupled with an increase in linear growth the Service will need to implement resources accordingly to ensure response standards to RTCs are maintained.

15. The demands on fire and rescue resources as a result of collective growth manifest themselves in a variety of forms, dependent on the scale and nature of the proposed development, including the need for the Service to: introduce new types of fleet (e.g. smaller ‘rapid response’ initial intervention vehicles); add new bays to existing fire stations to accommodate additional vehicles; relocate or provide new response facilities (e.g. fire stations); introduce new types of equipment; reduce risk and demand through the provision of fire suppression systems (sprinklers) in appropriate developments.

16. Inclusion of “KET3 – Kettering Fire Station, Headlands” proposes the relocation of Kettering Fire Station to an alternative location, in order to release the existing site for housing development. It is strongly advised that further discussion be undertaken with Northamptonshire Fire & Rescue regarding this Policy, in order to identify, secure and deliver an appropriate alternative site for the Fire Service, and that the Policy be amended to reflect that replacement facilities must be in place prior to the redevelopment of the site to ensure standards of service can be maintained.

17. Furthermore, where there is a direct impact on infrastructure provision relating to new housing development, developer contributions towards Fire and Rescue service buildings and equipment will be required through s106 planning obligations. The County Council will work with developers, the local planning authority and Northamptonshire Fire and Rescue to respond on site specific requirements as new planning applications come forward, and to identify opportunities for strategic infrastructure improvements to meet growing demand.

Libraries

18. Where a new development will generate additional need and library space requirement, the County Council requires contributions towards the costs of providing new, extended and/or improved library facilities to support the delivery of growth and to ensure that established national and local levels of service delivery can be maintained.

19. The County Council has adopted the National Library Tariff formula produced by the Museums Libraries and Archives Council (MLA). This includes:
A minimum standard of 30 sq metres of new library space per 1,000 Population. A construction and initial equipment cost on a per sq metre basis (adjusted to reflect Northamptonshire building costs), based on BCIS building costs for public libraries.

20. Where there is a direct impact on infrastructure provision relating to new housing development, developer contributions towards Library facilities, services, buildings and equipment will be required through s106 planning obligations. The county council will work with developers, the local planning authority and the Library service (including community-managed libraries) to respond on site specific requirements as new planning applications come forward, and to identify opportunities for strategic infrastructure improvements to meet growing demand.

Broadband21. The vision for the county to be at the leading edge of the global digital economy. To meet this challenge the County Council has set an ambitious target of 40% full fibre connectivity across Northamptonshire by December 2023. To deliver on this, it is essential that new developments (both housing and commercial) are served by high quality full fibre networks. Access to the speeds, 1 gbps or faster, delivered by this technology will bring a multitude of opportunities, savings and benefits. It also adds value to the development and is a major selling point for potential residents and occupiers.

22. Building further on this, the County Council is keen to encourage wider adoption of the approach, as recently outlined in the Government consultation document “New Build Developments: Delivering gigabit-capable connections (October 2018)”, which sets out proposals to require developers and operators to provide delivery of ‘full fibre’ connectivity to new build development. Whilst recognising that analysis of the consultation responses is still ongoing, the County Council recommends consideration of the proposals contained within the consultation document. In addition, there should also be acknowledgement of the need to improve mobile connectivity in the borough including increased coverage of 4G and enabling 5G access. This will have implications in terms of development.

23. In order for the commercial communications market to be able to deploy to these new build areas, measures must be introduced at the earliest opportunity. This will provide the required specification to enable fibre connectivity for all new developments in respect to receiving superfast broadband services. For further information on the project please visit www.superfastnorthamptonshire.net

Concluding commentsThe County Council welcomes the development of the Plan and opportunity to comment on this Regulation 19 version, and remain committed to working with Kettering Borough Council and other partners in relation to the sustainable delivery of infrastructure provision.

In terms of other infrastructure requirements for which the County Council has a statutory responsibility, such as Highways, S106 obligations for these would be handled directly by their respective areas within the Council. I would therefore suggest it may also be useful to liaise with these departments directly to ascertain any requirements over and above those mentioned here.

Continued engagement is welcomed with KBC, particularly as the Plan is progressed and as the County Council's adopted Planning Obligations Framework and Guidance (2015) document is updated. This will ensure that current priorities and policies of the County Council and KBC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 to effectively mitigate the impact of development.

**Notifications**

Do you wish to be notified?