

# West Northamptonshire Joint Core Strategy Local Plan - Proposed Changes to the Pre-Submission Version

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## Equalities Impact Assessment Update

West Northamptonshire Joint Planning Unit  
July 2012

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**West Northamptonshire  
Joint Planning Unit**

Contact Us:

01604 837838

[westnorthantsipu@northampton.gov.uk](mailto:westnorthantsipu@northampton.gov.uk)

[www.westnorthamptonshirejpu.org](http://www.westnorthamptonshirejpu.org)

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## **1. Introduction**

- 1.1 Equalities Impact Assessment (EqIA) is a process that investigates the potential equalities outcomes of a project or strategy. Its aim is to identify potential positive and negative impacts upon different equalities groups within the community. EqIA informs the decision-making process, and aims to reduce or remove negative impacts or inequalities from a project or strategy. A full EqIA was undertaken and published for the Pre-Submission version of the West Northamptonshire Joint Core Strategy.
- 1.2 This report provides an update of the EqIA which accompanied the Pre-Submission version of the Joint Core Strategy and should be read in conjunction with that document.

### **The Proposed Changes to West Northamptonshire Joint Core Strategy**

- 1.3 The Joint Core Strategy deals with the future planning of West Northamptonshire. It covers the whole of the administrative areas of Daventry District, Northampton Borough and South Northamptonshire Councils and sets out the long-term vision and objectives for the whole of the area for the plan period up to 2026, including strategic policies for steering and shaping development. It identifies specific locations for new strategic housing and employment and changes to transport infrastructure and other supporting community facilities, as well as defining areas where development will be limited. The Joint Core Strategy also helps to ensure the co-ordination and delivery of other services and related strategies such as health and education.
- 1.4 The Pre-Submission Joint Core Strategy was published for a statutory six week representation period between 17 February 2011 and 31 March 2011. The Pre-Submission stage was preceded by the Issues and Options Paper that was subject to consultation in September 2007, the Regulation 25 consultation in January 2009<sup>1</sup> and the Emergent Joint Core Strategy that was subject to consultation in July 2009. Following consideration of the representations received alongside a number of other factors, such as the publication of the National Planning Policy Framework a series of changes are now proposed to the Pre-Submission document. These changes will be subject to public consultation prior to the submission of the Joint Core Strategy to the Secretary of State for consideration at a public examination by an independent planning inspector, and before the plan is adopted. The Proposed Changes are being published for representations during a 6 week statutory period from Tuesday 14 August to Wednesday 26 September 2012.
- 1.5 This report presents the results of a review of the Proposed Changes to identify any likely impacts on the equalities groups identified in the Pre-Submission EqIA.

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<sup>1</sup> This consultation provided an opportunity to identify any new issues which the Joint Core Strategy should address following changes to the Government regulations on the preparation of Development Plans.

## **2. Assessing the Equalities Impacts of the Proposed Changes to the Pre-Submission Joint Core Strategy.**

2.1 The vision, objectives and policies of the Pre-Submission Joint Core Strategy have been subject to a comprehensive screening process to identify any impacts of the following equalities groups:

- Age
- Disability
- Gender
- Income Deprivation
- Race Religion or Belief
- Sexual Orientation.

2.2 The Proposed Changes fall into two categories i.e. Significant Proposed Changes and Minor Proposed Changes. The Minor Changes are not considered to have any significant effects on the equalities groups when compared to the Pre-Submission document. As such only those objectives and policies which are the subject of Significant Proposed Changes have been reassessed for this EqIA update.

2.3 In the Pre-submission EqIA a total of 90 objectives and policies, including the overall JCS Vision were assessed. A total of 32 objectives and policies are the subject of Significant Proposed Changes. These objectives and policies, as proposed to be changed, have been reassessed for potential effects, either positive or negative, on the equalities groups. The results of this re-assessment are set out in the Equalities Impact Assessment Screening Matrix attached as Appendix A.

## **3. Conclusion**

3.1 Almost two-thirds of the original objectives and policies in the Pre-Submission JCS, including the overall JCS vision are not subject to Significant Proposed Changes. For these objectives and policies it is clear that the findings of the Pre-Submission EqIA remain valid

3.2 As regards the 32 policies and objectives that are subject to Significant Proposed Changes, the detailed assessment set out in Appendix A shows that there are no negative effects, and in a number of cases the changes proposed result in enhanced positive effects for specified equalities groups. The re-assessment of the objectives and policies has demonstrated that, in all cases, the findings of the Pre-Submission EqIA remain valid.

## APPENDIX A

### West Northamptonshire Joint Core Strategy Local Plan – Proposed Changes to the Pre- Submission Version: Equalities Impact Assessment Screening Matrix

Key to symbols used in the Equalities Impact Assessment Screening Matrix	
Symbol	Likely Impact
+	Positive
0	Neutral / Negligible
-	Negative
(?)	Impact uncertain / requires monitoring

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<p><b>PC006/S</b>  <b>New Objective 16 - Heritage</b>                      Proposed change to include a new objective to preserve and, where possible, enhance important heritage assets.</p>	0	0	0	0	0	0	0	No specific impacts are anticipated.
<p><b>PC020/SS</b>  <b>Policy S5 – Sustainable Urban Extensions (SUEs)</b>                      Proposed changes reflect changes which are proposed to specific SUE policies in the Places section, including revisions to dwelling numbers and employment land allocations.</p>	+	+	0	+	0	0	0	Reductions in dwelling provision proposed for individual SUEs will reduce the level of affordable housing to be provided on the sites. However there is greater certainty that this quantum of development will be delivered in the plan period. The changes to employment land allocations within the SUEs will not have a significant effect as the loss of the technology realm from Northampton North is compensated by provision in the SEMLEP Northampton Waterside Enterprise Zone. Overall the benefits arising from the policy identified in the Pre-submission EqIA are still valid and the impact remains positive for the specified equalities groups.
<p><b>PC022/SS</b>  <b>Policy S6 – Monitoring and Review</b>                      Policy to strengthen the role of</p>	+	+	+	+	+	+	+	The introduction of a flexible but effective monitoring framework to support the delivery of the policies and

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Monitoring and Review in the plan process by introducing a flexible framework to monitor critical areas of plan delivery. This includes an illustrative phasing of housing development, and sets out how it will be updated.								objectives of the JCS is likely to benefit all the Equalities Groups.
<b>PC031/SS</b> <b>Policy S7 – Provision of Jobs</b> Proposed change to increase the jobs provision target from 16,000 to 19,000.	0	0	0	0	0	0	0	The provision of further job opportunities will benefit the wider community. Although it is not possible to predict whether there will be particular impacts on specific groups, all the equalities groups should benefit from the additional job opportunities.
<b>PC039/SS</b> <b>Policy S8 – Distribution of Jobs</b> <i>Proposed change to include the SEMLEP Northampton Waterside Enterprise Zone and recognise the potential for additional development within existing employment areas such as Swan Valley, Lodge Farm, Moulton Park and Brackmills. The proposed Technology Realm at Northampton North to be deleted as a consequence of the Enterprise Zone.</i>	+	+	0	+	0	0	0	The Pre-Submission EqlA identified a number of positive impacts arising from the Technology Realm, particularly for younger people, certain BME groups and those on low incomes. Whilst this is no longer proposed as part of the Northampton North SUE it is considered that the opportunities provided within the new SEMLEP Northampton Waterside Enterprise Zone will deliver even greater benefits for those groups. As the Enterprise Zone is closer to the centre of Northampton it is likely to open up opportunities to a wider spectrum of

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								the community.
<p><b>PC067/SS</b>  <b>Policy S10 – Sustainable Development Principles</b>                      Proposed change to strengthen the policy in terms of sustainable design, adaptation, resources and recycling, energy, water resources, environmental assets and pollution.</p>	+	+	+	+	+	+	+	The strengthening of the policy wording should enhance the positive benefits identified in the Pre-Submission EqIA for all the equalities groups.
<p><b>PC076/SS</b>  <b>Policy S11 – Low Carbon and Renewable Energy</b>                      Proposed change to reflect a wider approach to renewable energy, and link to energy standards in residential and non residential buildings</p>	+	+	0	+	0	0	0	Improved energy efficiency could have the benefit of reducing domestic energy bills (in relative terms). This will benefit those groups who are more likely to experience fuel poverty such as older people and those on low incomes. The emphasis on climate change adaptation should also benefit those groups who are most vulnerable to the adverse impacts of climate change such as the elderly and disabled people.
<p><b>PC018/C and PC019/C</b>  <b>Policy C3 – Strategic Connections</b>                      Proposed changes to add the Northampton M1/A45 Growth Management Scheme and the A43 Kettering to Northampton Improvements.</p>	+	+	0	+	0	0	0	The Pre-Submission EqIA indicated that Policy C3 would improve accessibility and provide increased transport options. The benefits identified for the specified equalities groups continue to apply.

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<p><b>PC009/E</b>  <b>Policy E3 – Technology Realm, SEMLEP Northampton Waterside Enterprise Zone</b>                      Proposed change to delete the technology real allocation within the Northampton North SUE and to make alternative provision within the Waterside Enterprise Zone.</p>	+	0	0	+	+	0	0	The Pre-Submission EqIA identified a number of positive impacts arising from the Technology Realm, particularly for younger people, certain BME groups and those on low incomes. Whilst this is no longer proposed as part of the Northampton North SUE it is considered that the opportunities provided within the new SEMLEP Northampton Waterside Enterprise Zone will deliver even greater benefits for those groups. As the Enterprise Zone is closer to the centre of Northampton it is likely to open up opportunities to a wider spectrum of the community.
<p><b>PC011/H</b>  <b>Policy H2- Affordable Housing</b>                      Revised requirements for affordable housing and site size thresholds to reflect the results of the updated SHMA and a further assessment of the contribution that small sites will make to overall housing provision.</p>	+	+	0	+	0	0	0	The proposed changes do not affect Northampton, but for Daventry and South Northamptonshire Districts split targets are proposed for the urban and rural areas. Targets in the rural areas are higher than in the urban areas having regard to the issues of viability and need. Overall the level of provision proposed is slightly higher than in the Pre-Submission JCS. The benefits identified in the Pre-Submission EqIA

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								for those equalities groups which tend to have a higher need for affordable housing therefore remain valid.
<p><b>PC012/H</b>  <b>Policy H3- Rural Exception Sites</b>                      To reflect the provisions of the National Planning Policy Framework which encourages Local Planning Authorities to consider the provision of market housing where this would ensure the delivery of affordable housing.</p>	+	+	0	+	0	0	0	The proposed change will enable the delivery of additional affordable housing in rural areas through cross-subsidy from market housing. This will have positive benefits for those equalities groups which tend to have a higher need for affordable housing.
<p><b>PC017/BN</b>  <b>Policy BN3 –Woodland Enhancement and Creation</b>                      Proposed change to provide greater protection in policy for ancient woodland and veteran trees outside ancient woodland.</p>	0	0	0	0	0	0	0	No specific impacts are anticipated.
<p><b>PC027/BN</b>  <b>Policy BN4 – Upper Nene Valley Gravel Pits Special Protection Area</b>                      Proposed changes to redefine the ‘buffer zone’ having regard to new evidence and provide clearer guidance regarding development impacts on the Special Protection Area.</p>	0	0	0	0	0	0	0	No specific impacts are anticipated.
<p><b>PC052/BN</b>  <b>New Policy BN7A – Water Supply, Quality and Wastewater Infrastructure</b></p>	+	0	0	+	0	0	0	Improved water efficiency could have the benefit of reducing domestic water bills (in relative terms). This should

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New Policy to reflect results of Water Cycle Study and bring together all water related policy. Includes provisions relating to water supply and quality, wastewater treatment capacity and water efficiency.								benefit those on low and/or fixed incomes who may struggle to cope with the increasing cost of utilities such as water supply.
<b>PC014/ID</b> <b>Policy INF2 – Contributions to Infrastructure Delivery</b> Changes to provide a clearer more focussed policy.	+	+	0	+	0	+	0	The Pre-Submission EqIA identified positive benefits for the specified equalities groups. These benefits remain valid.
<b>PC005/N</b> <b>Policy N1- The Regeneration of Northampton</b> The proposed changes this policy include the designation of the SEMLEP Northampton Waterside Enterprise Zone and the reallocation of the Technology Realm to the Enterprise Zone.	+	+	+	+	+	+	+	The Pre-Submission EqIA identified positive benefits arising from the policy for the specified equalities groups. These positive benefits are further enhanced by the inclusion of the SEMLEP Northampton Waterside Enterprise Zone within the policy, which will create further opportunities for jobs and training to improve the skills of the local workforce.
<b>PC007/N</b> <b>Policy N2 – Northampton Central Area</b> Revised floorspace figures for comparison and convenience retailing in the central area. The figures are expressed as minima	+	+	0	+	0	0	0	The central area will remain the focus for major office, leisure, cultural and retail development, although the overall amount of retail floorspace that is required is less than in the Pre-

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subject to no adverse impact on other centres. The need to reduce flood risk is acknowledged within the policy.								Submission. The positive benefits identified in the Pre-Submission EqIA remain valid. The emphasis on reducing flood risk will also have benefits for vulnerable groups who may be more severely affected by the impacts of flooding, such as the elderly and disabled.
<p><b>PC013/N</b>  <b>Policy N3 – Northampton North SUE</b>                      Proposed change includes the deletion of the Technology Realm allocation from the SUE proposal and its reallocation within the SEMLEP Northampton Waterside Enterprise Zone. The proposed park and ride is also deleted.</p> <p>Revised policy wording which:</p> <ul style="list-style-type: none"> <li>• avoids being too prescriptive regarding the size of the schools that will be required;</li> <li>• provides some flexibility on the size of the convenience store that can be provided;</li> <li>• provides greater flexibility regarding library provision ; and</li> <li>• provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>	+	+	0	+	+	+(?)	0	<p>The loss of the Technology Realm from the SUE is more than compensated by the provision within the SEMLEP Northampton Waterside Enterprise Zone. Local employment opportunities will still be provided within the SUE. The deletion of Park and Ride may reduce the transport options available but there is still a requirement for the provision of an integrated transport network including public transport.</p> <p>The positive benefits identified in the Pre-Submission EqIA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.</p>

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<p><b>PC017/N</b>  <b>Policy N4 – Northampton West SUE</b>                      Revised policy wording which:</p> <ul style="list-style-type: none"> <li>• avoids being too prescriptive regarding the size of the schools that will be required;</li> <li>• provides some flexibility on the size of the convenience store that can be provided;</li> <li>• reflects that the Sandy Lane Improvement (North) has been completed;</li> <li>• ensures that the development mitigates impacts that may be identified through a transport assessment; and</li> <li>• provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>	+	+	0	+	+	+(?)	0	The positive benefits identified in the Pre-submission EqIA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.
<p><b>PC020/N</b>  <b>Policy N5 – Northampton South SUE</b>                      Revised policy wording which:</p> <ul style="list-style-type: none"> <li>• avoids being too prescriptive regarding the size of the schools that will be required;</li> <li>• provides some flexibility on the size of the convenience store that can be</li> </ul>	+	+	0	+	+	+(?)	0	The positive benefits identified in the Pre-submission EqIA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.

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<p>provided; and</p> <ul style="list-style-type: none"> <li>provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>								
<p><b>PC022/N</b>  <b>Policy N6 – Northampton South of Brackmills SUE</b>                      Revised policy wording which:</p> <ul style="list-style-type: none"> <li>avoids being too prescriptive regarding the size of the schools that will be required;</li> <li>provides some flexibility on the size of the convenience store that can be provided;</li> <li>includes a requirement for ecological and archaeological assessment of the site; and</li> <li>provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>	+	+	0	+	+	+(?)	0	The positive benefits identified in the Pre-submission EqlA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.
<p><b>PC026/N</b>  <b>Policy N7 – Northampton Kings Heath SUE</b>                      Proposed change to reduce the dwelling provision within the SUE from 3500 to 3000 and remove the requirement for Park and Ride provision.</p> <p>Revised policy wording which:</p>	+	+	0	+	+	+(?)	0	The reduction in dwelling provision will consequently reduce the level of affordable housing to be provided on this site. However there is greater certainty that this quantum of development will be delivered in the plan period. The deletion of Park and Ride may reduce the transport options available but there is still a

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<ul style="list-style-type: none"> <li>• avoids being too prescriptive regarding the size of the schools that will be required;</li> <li>• provides some flexibility on the size of the convenience store that can be provided;</li> <li>• Recognises the need for financial contributions for off-site highway improvements; and</li> <li>• provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>								<p>requirement for the provision of an integrated transport network including public transport.</p> <p>The positive benefits identified in the Pre-Submission EqIA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.</p>
<p><b>PC028/N</b>  <b>Policy N8 – Northampton North of Whitehills SUE</b>                      Revised policy wording which:</p> <ul style="list-style-type: none"> <li>• avoids being too prescriptive regarding the size of the schools that will be required;</li> <li>• provides some flexibility on the size of the convenience store that can be provided;</li> <li>• deletes the requirement for Park and Ride;</li> <li>• ensures that the development mitigates impacts that may be identified through a transport</li> </ul>	+	+	0	+	+	+(?)	0	<p>The deletion of Park and Ride may reduce the transport options available but there is still a requirement for the provision of an integrated transport network including public transport.</p> <p>The positive benefits identified in the Pre-Submission EqIA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.</p>

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assessment; and <ul style="list-style-type: none"> <li>provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>								
<b>PC033/N</b> <b>Policy N9 – Northampton Upton Park SUE</b> Revised policy wording which: <ul style="list-style-type: none"> <li>avoids being too prescriptive regarding the size of the schools that will be required;</li> <li>provides some flexibility on the size of the convenience store that can be provided;</li> <li>Recognises the deletion of the Country Park Extension as part of the SUE proposal; and</li> <li>provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>	+	+	0	+	+	+(?)	0	The positive benefits identified in the Pre-Submission EqIA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.
<b>PC037/N</b> <b>Policy N10 – Convenience Shopping Needs Outside Northampton Town Centre</b> Rewording for clarity and to appropriately allow for convenience goods retailing provision in the wider urban area of	+	+	0	+	+	0	0	The positive benefits identified in the Pre-Submission EqIA, arising from the provision of services and facilities in accessible district and local centres remain valid.

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Northampton.								
<b>PC045/N</b> <b>Policy N12 – Northampton’s Transport Network Improvements</b> Proposed change to strengthen the policy and provide greater clarity on the transport infrastructure that is required to support planned development in Northampton	+	+	0	+	0	0	0	The positive benefits identified in the Pre-Submission EqIA remain valid and will be enhanced by the proposed changes to the policy.
<b>PC014/D</b> <b>Policy D1 – The Regeneration of Daventry Town</b> Proposed change to include the provision of an enhanced green infrastructure network including the canal link, Daventry Country Park and Borough Hill.	+	+	0	+	+	0	0	The proposed change will further enhance the positive benefits identified in the Pre-Submission EqIA.
<b>PC015/D</b> <b>Policy D2 – Daventry Town Centre</b> Proposed changes to reflect reduced retail floorspace requirements and recognise the town centre’s heritage assets.	+	+	0	+	0	0	0	The town centre will remain the focus for new office, leisure, and retail development, although the overall amount of retail floorspace that is required is less than in the Pre-Submission. The positive benefits identified in the Pre-Submission EqIA remain valid.
<b>PC025/D</b> <b>Policy D3 – Daventry North East SUE</b> Proposed change to reduce the dwelling provision within the SUE during the plan	+	+	0	+	+	+(?)	0	The reduction in dwelling provision will consequently reduce the level of affordable housing to be provided on this site. However there is greater

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period from 2500 to 2000								certainty that this quantum of development will be delivered in the plan period. The overall capacity of the allocated site remains as 4000 dwellings but it is anticipated that around 2000 dwellings will be delivered beyond the end of the plan period in 2026. The benefits arising from the policy identified in the Pre-Submission EqIA are still valid and the overall impact remains positive for the specified equalities groups.
<p><b>PC006/T</b>  <b>Policy T3 – Towcester South SUE</b>                      Proposed change to reduce the dwelling provision from 3300 to 3000                      Revised policy wording which:</p> <ul style="list-style-type: none"> <li>• better ensures and improves delivery of the proposed development;</li> <li>• fully recognise the heritage assets within and near to the site; and</li> <li>• provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>	+	+	0	+	+	+(?)	0	<p>There is a marginal reduction in the overall number of dwellings within the allocation from 3300 to 3000. It is still expected that 1500 dwellings will be delivered in the plan period.</p> <p>The positive benefits identified in the Pre-Submission EqIA, arising from the provision of housing (including affordable housing), local employment opportunities and a range of community facilities remain valid.</p>
<p><b>PC013/B</b>  <b>Policy B2 – Brackley East SUE</b>                      Proposed change to reduce the dwelling provision within the SUE from 380 to 350.</p>	+	+	0	+	+	+(?)	0	<p>The marginal reduction in dwelling provision will slightly reduce the level of affordable housing to be provided on this site. However there is greater</p>

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Revised policy wording which: <ul style="list-style-type: none"> <li>recognises the need for archaeological assessment; and</li> <li>provides simplified and consistent wording in respect of flood risk and surface water management.</li> </ul>								certainty that this quantum of development will be delivered in the plan period. The benefits arising from the policy identified in the Pre-Submission EqIA are still valid and the overall impact remains positive for the specified equalities groups.
<b>PC010/R</b> <b>Policy R1 – Spatial Strategy for the Rural Areas</b> Proposed changes to: <ul style="list-style-type: none"> <li>clarify the scale of growth that is required in the rural areas;</li> <li>provide greater flexibility for local decisions by confirming that the percentage growth figures are indicative and expressing them as being “up to” rather than within a narrow range;</li> <li>provide further clarification on the operation of the policy; and</li> <li>ensure that small settlements and hamlets are included within the hierarchy.</li> </ul>	+	+	0	+	0	0	0	The positive benefits identified in the Pre-Submission EqIA, arising from the provision of additional housing and employment and the retention and improvement of local services in rural areas remain valid.