

# West Northamptonshire Joint Core Strategy Local Plan (Part 1) - Proposed Main Modifications to the Joint Core Strategy (as submitted)

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## Equalities Impact Assessment Update

West Northamptonshire Joint Planning Unit  
December 2013

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**West Northamptonshire Joint Core Strategy Local Plan (Part 1) – Proposed Main Modifications – Equalities Impact Assessment Update**

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## **West Northamptonshire Joint Core Strategy Local Plan (Part 1) – Proposed Main Modifications – Equalities Impact Assessment Update**

### **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 (February 2011) and an update was published to accompany the Proposed Changes to the Pre-Submission Joint Core Strategy (July 2012).
- 1.2 This report provides a further update of the EqIA to address the Main Modifications which are now proposed to the Joint Core Strategy as submitted.

### **The Proposed Main Modifications to West Northamptonshire Joint Core Strategy**

- 1.3 The Joint Core Strategy (JCS) 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 2029, 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 JCS also helps to ensure the co-ordination and delivery of other services and related strategies such as health and education.
- 1.4 The JCS was submitted to the Secretary of State for Examination at the end of 2012. An independent Inspector was appointed and held a first set of Examination Hearings in April and May 2013. In the light of evidence considered and discussed at the Hearings the Inspector asked the Joint Planning Unit to undertake the following further work:
  - To undertake a fresh assessment of the objectively assessed housing needs in the area over the plan period and beyond;
  - To prepare a Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Addendum to address acknowledged shortcomings in the work to date; and
  - To assess whether further modifications were required to the JCS in the light of the evidence presented at the Hearings and the outcomes of the additional work.
- 1.5 The additional work described above has now been completed and Main Modifications are being proposed to the JCS. This report presents the results of a review of the Proposed Main Modifications to identify any likely impacts on the equalities groups identified in the Pre-Submission EqIA.

## **West Northamptonshire Joint Core Strategy Local Plan (Part 1) – Proposed Main Modifications – Equalities Impact Assessment Update**

### **Assessing the Equalities Impacts of the Proposed Main Modifications to the 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 Joint Planning Unit has reviewed all of the Proposed Main Modifications which entail changes to the vision, objectives, or policies in the JCS to ascertain the effects that any changes could have on the equalities groups when compared to the Pre-Submission document and the subsequent Proposed Changes. Proposed Main Modifications which relate to explanatory text and other parts of the JCS such as the Appendices and Inset Maps have not been included in the EQIA as they will not have any significant effects.
- 2.3 In the Pre-Submission EqIA a total of 90 objectives and policies, including the overall JCS Vision were assessed. At the Proposed Changes stage a total of 32 objectives and policies were the subject of Significant Proposed Changes which were included in the EqIA update. The Proposed Main Modifications propose 3 new policies, and changes to 26 existing policies and 1 of the objectives. These objectives and policies, as proposed to be modified, 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.

### **Conclusion**

- 3.1 The overall JCS vision, fifteen original objectives and twenty-seven policies in the Pre-Submission JCS, have not been subject to either Significant Proposed Changes or to the Proposed Main Modifications. For these objectives and policies it is clear that the findings of the Pre-Submission EqIA remain valid. A further sixteen policies were subject to Significant Proposed Changes, but are not affected by the Proposed Main Modifications. For these policies the findings of the EqIA Update which was published alongside the Significant Proposed Changes remain valid.
- 3.2 As regards to the twenty-six existing policies and one objective that are subject to Proposed Main Modifications, 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

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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.

- 3.3 There are three new policies included in the Proposed Main Modifications all of which are expected to have either positive or neutral impacts on the Equalities Groups. The proposed new Policy SA - Presumption in Favour of Sustainable Development is likely to have a positive impact on all the equalities groups. New Policy N9A proposes a new Sustainable Urban Extension (SUE) at Norwood Farm / Upton Lodge on the western edge of Northampton. The SUE will provide new housing (including affordable housing), employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace and a sustainable transport network. It is expected to have positive benefits for the specified Equalities Groups relating to age, income deprivation, race and religion / belief. Finally new policy E8 relates to a strategic employment allocation at Northampton M1 Junction 16. The provision of additional job opportunities arising from the allocation will benefit the wider community, but it is not possible to predict whether there will be particular benefits for specific Equalities Groups.

## APPENDIX A

### West Northamptonshire Joint Core Strategy Local Plan (Part 1) – Proposed Main Modifications: 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

## Proposed Main Modifications to the West Northamptonshire Joint Core Strategy as submitted : Equalities Impact Assessment Screening Matrix

Main Modification	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
<p><b>MM1</b> <b>Policy SA (New Policy) – Presumption in Favour of Sustainable Development</b></p> <p>The policy proposes that the relevant council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.</p>	+	+	+	+	+	+	+	Sustainable development will improve the economic, social and environmental conditions in the area. The new policy is therefore likely to have a positive impact on all the equalities groups.
<p><b>MM3</b> <b>Objective 16 – Heritage</b></p> <p>Proposed modification to reflect the National Planning Policy Framework and the importance of the contribution made by the setting of a historic asset to its significance.</p>	0	0	0	0	0	0	0	No specific impacts are anticipated.
<p><b>MM5</b> <b>Policy S3 – Scale and Distribution of Housing Development</b></p> <p>The proposed modification sets out the scale of housing development to be provided in the plan period and how this will be distributed between the three Council areas and between urban and rural locations. Furthermore, this modification reflects the outcome of the objectively assessed housing needs work and the extension of the plan period to 2029.</p>	+	+	0	+	0	0	0	The scale of housing development is such that this meets the objectively assessed housing needs of the West Northamptonshire plan area. The concentration of development in sustainable urban and rural locations should benefit those with disabilities, older and younger people and those on lower incomes.

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<p><b>MM6</b> <b>Policy S4 – Northampton Related Development Area</b></p> <p>The proposed modification to the policy amends the net dwelling provision figure to reflect an increase in the objectively assessed housing need up to 2029.</p>	+	+	0	+	0	0	0	<p>The provision of additional housing to meet the needs of Northampton, including affordable housing should benefit lower income groups. The policy area will enable development in sustainable locations adjoining the existing urban area reducing the need to travel. This should benefit those with disabilities, older and younger people and those on lower incomes, who may not have access to a car.</p>
<p><b>MM8</b> <b>Policy S5 – Sustainable Urban Extensions(SUE)</b></p> <p>Proposed modification to this policy is to accommodate an increase in the objectively assessed housing and jobs need up to 2029. The modification proposes extensions to existing SUE allocations and a new SUE allocation in the Northampton Related Development Area. The dwelling delivery figure for SUEs in Daventry and Towcester is increased to reflect the extended plan period.</p>	+	+	0	+	0	0	0	<p>The new and extended SUEs are in accessible locations and will provide local services and employment opportunities. This should benefit those with disabilities, older and younger people and those on lower incomes, who may not have access to a car.</p>
<p><b>MM9</b> <b>Policy S6 – Monitoring and Review</b></p> <p>The proposed modification proposes a more flexible approach to monitoring and the phasing of development</p>	0	0	0	0	0	0	0	<p>As this policy relates to the monitoring of the other policies and proposals in the plan, it does not have any direct impact on the equalities groups. Effective monitoring will however be</p>

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during the plan period.								important for the implementation of the plan and the delivery of the positive benefits identified.
<p><b>MM11</b> <b>Policy S7 – Provision of Jobs</b></p> <p>The proposed modification to this policy makes provision for an increase in jobs during the extended plan period to maintain the balance between homes and jobs and maintain a diverse economic base.</p>	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 additional job opportunities.
<p><b>MM14</b> <b>Policy S8 – Distribution of Jobs</b></p> <p>Proposed modification to include a new strategic employment site at Northampton M1 Junction 16 and to support growth at the Daventry International Rail Freight Terminal (DIRFT)</p>	+	+	0	+	0	0	0	The Pre-Submission JCS EqIA identified a number of positive impacts, particularly for younger people, certain BME groups and those on low incomes. The proposed developments now included in the proposed modification will ensure employment opportunities will arise for the aforementioned groups.
<p><b>MM18</b> <b>Policy S9 – Distribution of Retail Development</b></p> <p>The proposed modification draws a distinction between the primary shopping area and the rest of the town centre in Northampton and retains the focus on retail development within town centres, particularly Northampton and sets out a sequential approach</p>	+	+	0	+	0	0	0	The proposed modification of the policy wording maintains the positive benefits identified in the Pre-Submission JCS EqIA for all the equalities groups. The provision of retail facilities in accessible town, district and local centres should reduce the need to travel longer distances. This should benefit those with disabilities, older and younger people and those on lower incomes,

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where this is not possible.								who may not have access to a car.
<p><b>MM19</b> <b>Policy S10 – Sustainable Development Principles</b></p> <p>The proposed modification strengthens the policy by including reference to the importance of the setting of historical assets.</p>	+	+	+	+	+	+	+	The proposed modification to the policy does not affect the positive benefits identified in the Pre-Submission JCS EqIA for all the equalities groups.
<p><b>MM22</b> <b>Policy RC2 – Community Needs</b></p> <p>The proposed modification indicates that the individual Part 2 Local Plans in each of the District / Borough areas will provide more detailed guidance on the provision of financial contributions for community facilities.</p>	+	+	0	+	0	+	0	The proposed modification relates to the means by which the policy will be implemented but does not materially change its purpose or intent. Provision of community facilities including open space and sports facilities and the modified policy will benefit all sections of the community and will have particular benefits for the Equalities Groups identified in the matrix. For example, facilities such as medical centres, sports pitches, and community centres will benefit those groups that use those facilities such as the elderly and young people. Specific reference is made to the provision of places of worship.
<p><b>MM24</b> <b>Policy E1 – Existing Employment Areas</b></p> <p>The proposed modification of this policy is to provide greater flexibility in</p>	0	0	0	0	0	0	0	No specific impacts are anticipated.

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the range of employment generating uses that can be considered within the existing employment areas and to clarify the implementation of the policy.								
<p><b>MM25</b> <b>Policy E2 – New Office Floorspace</b></p> <p>The proposed modification to the policy identifies a sequential approach to new office development with priority given to Northampton Town Centre, Daventry Central Area, and the rural service centres of Towcester and Brackley. The modification to this policy will also clarify and improve its implementation.</p>	+	+	0	+	0	0	0	The provision of office jobs in accessible town centre locations should reduce the need to travel. This should benefit those with disabilities, older and younger people and those on lower incomes, who may not have access to a car.
<p><b>MM26</b> <b>New Policy E8 – Northampton Junction 16 Strategic Employment Site</b></p> <p>The proposed modification for this policy identifies a location for strategic employment development which will meet the employment needs of Northampton within the extended plan period.</p>	0	0	0	0	0	0	0	The provision of additional job opportunities will benefit the wider community, but it is not possible to predict whether there will be particular benefits for specific Equalities Groups. Ensuring that the site is accessible by public transport will be critical to ensure that those groups who are less likely to have access to a private car, such as those with disabilities, younger people, and those on low incomes are not disadvantaged.
<p><b>MM29and MM31</b> <b>Policy H1 – Housing Density and Mix and Type of Dwellings</b></p>	+	+	+	+	+	+	+	The proposed incorporation of the policy wording from Policy H4 into Policy H1 will maintain the positive

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<p><b>Policy H4 – Specialised Accommodation</b></p> <p>The proposed modification to the policy is to incorporate the provision of Policy H4 which is proposed to be deleted.</p>								benefits identified in the Pre-Submission JCS EqIA for all the equalities groups. The modified Policy H1 will have a positive impact for all sectors of the community, but the commitment to providing a range of housing to meet needs is likely to benefit those equalities groups who may have particular housing needs such as older people, those with disabilities, and those on lower incomes who need affordable housing.
<p><b>MM33 Policy H7 – Gypsies, Travellers and Travelling Showpeople</b></p> <p>The proposed modification identifies pitch and site requirements for gypsies, travellers and travelling showpeople, based on evidence of need in the plan period up to 2029.</p>	0	0	0	0	+(?)	0	0	The proposed modified policy reflects the conclusions of the West Northamptonshire Travellers Accommodation Needs Study. It should have a positive impact in terms of providing accommodation to meet the identified needs of gypsies and travelling showpeople, but implementation of the policy will require monitoring.
<p><b>MM34 Policy BN3 – Woodland Enhancement and Creation</b></p> <p>The proposed modification strengthens the policy by including reference to aged and veteran trees.</p>	0	0	0	0	0	0	0	No specific impacts are anticipated.
<p><b>MM37 Policy BN5 – The Historic</b></p>	0	0	0	0	0	0	0	No specific impacts are anticipated.

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<p><b><i>Environment and Landscape</i></b></p> <p>The proposed modification to this policy is to clarify the policy approach to landscape and landscape sensitivity.</p>								
<p><b><i>MM38 Policy BN7A – Water Supply, Quality and Wastewater Infrastructure</i></b></p> <p>The proposed modification seeks to strengthen the policy by ensuring that water quality is protected and, where practicable, improved.</p>	+	0	0	+	0	0	0	This policy was introduced in the Proposed Changes to the Pre-Submission JCS. The proposed strengthening of the policy will maintain the positive benefits identified in the Proposed Changes EqIA.
<p><b><i>MM39 Policy BN7 – Flood Risk</i></b></p> <p>The proposed modification seeks to strengthen the policy by including specific reference to West Northamptonshire Strategic Flood Risk Assessments.</p>	+	0	+	+	0	0	0	The modified policy will continue to have benefits for all sectors of the community, and will have particular benefits for vulnerable groups such as the elderly and disabled who may be more severely affected by the impacts of flooding.
<p><b><i>MM42 Policy N3 – Northampton North SUE</i></b></p> <p>Proposed modification to the sustainable urban extension to increase the dwelling provision by 1500 dwellings and to include 10ha of employment land.</p>	+	0	0	+	+	+(?)	0	The SUE is increased in size and will provide additional housing (including affordable housing), employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace and a sustainable transport network. It will therefore have positive benefits for the specified Equalities Groups.

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								Monitoring will be required to ensure adequate provision for faith communities as part of the community facilities provided.
<b>MM43</b> <b>Policy N4 – Northampton West SUE</b>  Proposed modification to the sustainable urban extension to increase the dwelling provision by 1050 dwellings.	+	0	0	+	+	+(?)	0	The SUE is increased in size and will provide additional housing (including affordable housing), employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace and a sustainable transport network. It will therefore have positive benefits for the specified Equalities Groups. Monitoring will be required to ensure adequate provision for faith communities as part of the community facilities provided.
<b>MM45</b> <b>Policy N6 – Northampton South of Brackmills SUE</b>  Proposed modification to the sustainable urban extension to increase the dwelling provision by 300 dwellings.	+	0	0	+	+	+(?)	0	The SUE is increased in size and will provide additional housing (including affordable housing), employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace and a sustainable transport network. It will therefore have positive benefits for the specified Equalities Groups. Monitoring will be required to ensure adequate provision for faith communities as part of the community facilities provided.

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<p><b>MM46</b> <b>New Policy N9A – Northampton Upton Lodge / Norwood Farm SUE</b></p> <p>A sustainable urban extension including provision for 3,500 dwellings and local employment opportunities.</p>	+	0	0	+	+	+(?)	0	The SUE will provide new housing (including affordable housing), employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace and a sustainable transport network. It will therefore have positive benefits for the specified Equalities Groups. Monitoring will be required to ensure adequate provision for faith communities as part of the community facilities provided.
<p><b>MM48</b> <b>Policy D3 – Daventry North Sustainable Urban Extension</b></p> <p>Proposed modification to reflect the extended plan period to 2029 and the expectation that a further 600 dwellings will be completed on the site during the plan period.</p>	+	0	0	+	+	+(?)	0	The SUE will provide new housing (including affordable housing), employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace and a sustainable transport network. It will therefore have positive benefits for the specified Equalities Groups. Monitoring will be required to ensure adequate provision for faith communities as part of the community facilities provided.
<p><b>MM51</b> <b>Policy T3 – Towcester South SUE</b></p> <p>Proposed modification to reflect the extended plan period to 2029 and the expectation that a further 600 dwellings will be completed on the site</p>	+	0	0	+	+	+(?)	0	The SUE will provide new housing (including affordable housing), employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace and a sustainable transport network. It will

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during the plan period.								therefore have positive benefits for the specified Equalities Groups. Monitoring will be required to ensure adequate provision for faith communities as part of the community facilities provided.
<p><b>MM54</b> <b>Policy B2 – Brackley East Sustainable Urban Extension</b></p> <p>The proposed modification will allow greater flexibility for employment generating uses and enable the provision of health care facilities on the site as part of the SUE proposal.</p>	+	0	0	+	+	+(?)	0	The proposed modified SUE proposal will provide new housing (including affordable housing), a greater range of employment opportunities, and a range of facilities required to support the community including, retail, education, greenspace a sustainable transport network, and health care provision. It will therefore have positive benefits for the specified Equalities Groups. Monitoring will be required to ensure adequate provision for faith communities as part of the community facilities provided.
<p><b>MM55</b> <b>Policy B3 – Brackley North Sustainable Urban Extension</b></p> <p>The proposed modification to the policy confirms the requirement for improvement to the A43 junctions arising from the development</p>	+	0	0	+	+	+(?)	0	The proposed revised wording of this policy does not change the impacts previously.
<p><b>MM57</b> <b>Policy R1 – Spatial Strategy for the Rural Areas</b></p>	+	+	0	+	0	0	0	The proposed modified policy approach will continue to provide opportunities for additional housing

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The proposed modification to the policy reflects the outcome of the objectively assessed housing needs work and the extension of the plan period to 2029. It also provides a more flexible and positive approach to development in the rural areas and provides greater clarity on implementation.								and employment in the rural areas, and support the retention and provision of local services and facilities. It will therefore have positive benefits for the specified Equalities Groups.