



## Northamptonshire County Council

Planning Policy  
ENC Local Plan Part 2  
East Northamptonshire Council  
Cedar Drive  
Thrapston  
NN14 4LZ

Please ask for:  
Tel:  
Our ref:  
Your ref:  
Date:

19 March 2021

Dear Sir,

### **RE: East Northamptonshire Local Plan Part 2 Regulation 19 Consultation**

#### **Submission of Northamptonshire County Council Development Infrastructure & Funding Service**

Thank you for your notification regarding the Regulation 19 consultation on the East Northamptonshire Local Plan Part 2 2011-2031 (the Plan). I am responding on behalf of Northamptonshire County Council key services (Education, Libraries, Broadband) and on behalf of Northamptonshire Fire and Rescue Service, on which development designated in the Plan would have an impact. Other County Council service areas may respond separately.

In accordance with Policy 10 of the North Northamptonshire Joint Core Strategy (JCS), any development will be required to adequately mitigate its impact on existing infrastructure. In the majority of cases, this is expected to be achieved through provision of Section 106 developer contributions.

The County Council's 'Creating Sustainable Communities: Planning Obligations Framework and Guidance – January 2015' document sets out the adopted policy approach of the County Council to requesting and securing developer contributions (including Section 106 planning obligations) in respect of Education, Libraries, Fire and Rescue and Superfast Broadband infrastructure (amongst other areas). The County Council recommends that the development proposals set out in the Plan be underpinned by the policy set out in this document (and future iterations) to ensure that sufficient capacity can be provided across East Northamptonshire to meet the needs of planned for growth.



Northamptonshire  
County Council

The County Council therefore welcomes the opportunity to engage with East Northamptonshire Council (ENC) to discuss these matters, and to guide the planning and development of new and expanded facilities and infrastructure to meet the needs of proposed growth at all stages of the planning process to identify where such contributions are necessary.

## **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.
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 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. The joint policy document '*Planning for Schools Development - 2011*' prepared by the Secretary of State for Education and Secretary of State for Communities and Local Government sets out the Government's commitments in the 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. Since 2010, the County Council has invested in excess of £230m in the schools estate in Northamptonshire; its Capital Strategy 2018-23 identified 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.
5. 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.

6. The Department for Education publication '*Securing developer contributions for Education (April 2019)*' sets out best practice guidance for local authorities and developers when considering the impact of new housing on education infrastructure and firmly establishes the Government's expectation that developer contributions play a fundamental role in contributing towards delivery of school places required as a direct result of new housing development.
7. A number of new schools have been identified as required for the East Northamptonshire area for the Plan period to 2031 and beyond. This provision relates largely to the specific demand generated by new housing development coming forward in the Plan period, including through delivery of the Rushden East SUE.
8. The draft Rushden East SUE Masterplan Framework Document indicatively identifies sites for two primary schools and a secondary school as required by the JCS through Policy 33. The proposed locations of these are considered to be generally appropriate in terms of meeting the requirements of local residents, however further assessment will need to be carried out – particularly in relation to the proposed Secondary School site – to fully understand any pre-existing conditions which may affect deliverability, for example site specific constraints, topography, ground conditions etc.
9. The Plan indicates that by 2031, the Rushden East SUE is expected to have delivered up to 1,200 dwellings of its overall allocation. It will be important for further discussions to be had with regards to the phasing and delivery of the Schools in the SUE to ensure that sufficient capacity can be provided at the appropriate time.
10. The inclusion in the Plan of Policy EN17 for the provision of a new Special Educational Needs & Disabilities school at Higham Ferrers is fully supported by the County Council. As is stated within the Plan, there is a clear and demonstrable need for new SEND provision to meet the increased demand for specialist facilities; this Policy provides a mechanism to ensure that this demand can be met.
11. The North Northamptonshire Infrastructure Delivery Plan (IDP) sets out the strategic infrastructure requirements for education, including delivery of new schools. Ongoing collaboration on the IDP between partners will be required to ensure it is regularly reviewed and updated.
12. In many cases however it may not be possible to meet the demand for places through new school delivery and it will therefore be necessary to address this requirement through expansion of existing school infrastructure.

13. Where on-site mitigations cannot be achieved then suitable off-site mitigations will be required through Section 106 developer contributions, taking into account the ability of existing schools to expand on their sites, and the potential for reducing reliance on vehicular journeys for home-to-school travel. The County Council will work directly with scheme promoters to discuss opportunities to address these requirements.
14. Furthermore, in the event that additional capacity is required to be provided ahead of specific development sites coming forward – for example in order to also accommodate wider cumulative impacts in the surrounding area, whilst also taking into account the likely long-term yield from development sites across the Plan period – then developer contributions will continue to be required from those sites as they come forward in order to retrospectively contribute towards infrastructure delivered ahead of demand. Such an approach supports the forward-funding of infrastructure by enabling repayment of up-front funding at a later date as development comes forward, and will be critical in reducing the reliance on local authorities to finance delivery of infrastructure required as a result of growth.

## **Libraries**

15. In accordance with our previous comments on earlier versions of the Plan, it is noted that Library Infrastructure is identified (and protected) by Policy 7 of the Joint Core Strategy as an identified community facility.
16. The County Council will assess the impact of proposed new housing development on existing infrastructure, facilities and services delivered through local libraries (including County Council maintained and community managed services), and will secure Section 106 developer contributions, where appropriate, to help mitigate the impact of new housing, and an increasing population, on these.
17. Such contributions will support delivery of capacity and improvements to the range of facilities and services delivered by Libraries in line with the County Council's priorities for the Library service, and to meet the needs of growing communities.

## **Fire & Rescue**

18. Northamptonshire Fire and Rescue Service (NFRS) has identified that new development 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 and response standards are maintained, consistent with national Government expectations and guidance.

19. Northamptonshire Fire and Rescue Service 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.
20. The projected collective growth of the county will impact on ability of NFRS to maintain Standards of Operational Response. For example:
21. **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.
22. **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).
23. 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.
24. 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:
  - a. introduce new types of fleet (e.g. smaller 'rapid response' initial intervention vehicles);
  - b. add new bays to existing fire stations to accommodate additional vehicles;
  - c. relocate or provide new response facilities (e.g. fire stations);  
introduce new types of equipment;
  - d. reduce risk and demand through the provision of fire suppression systems (sprinklers) in appropriate developments
25. Where there is a direct impact on infrastructure provision relating to new commercial and/or housing development, developer contributions towards Fire and Rescue service buildings and equipment will be required through s106 planning obligations, or for appropriate planning conditions to be applied to permissions granted to ensure that adequate infrastructure is in place.

26. 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.

## **Broadband**

27. The Northamptonshire vision is for the county to be at the leading edge of the global digital economy. This requires new developments (both housing and commercial) to be directly served by high quality fibre networks. Access to a next generation network (speeds of >30mbs) will bring a multitude of opportunities, savings and benefits to the county. It also adds value to the development and attract occupiers. Maximising full-fibre coverage is clearly the goal.

28. Furthermore, the County Council is keen to encourage wider adoption of the approach, as recently outlined in an October 2018 consultation document published by, of the delivery of 'full fibre' connectivity to new build development. The County Council request that ENC consider the proposals contained within the consultation document, and advocate that the aims of this approach be reflected in the Plan. This should include acknowledgement of the need to improve mobile connectivity in the district including increased coverage of 4G and enabling 5G access. This will have implications in terms of development.

## **Other matters**

29. The County Council welcomes inclusion within the Plan of a policy (EN13-h) to encourage and support the further use of electric vehicle charging points on new development sites, similar to the approach proposed in the recent South Northamptonshire Local Plan Part 2 consultation (Policy INF4). Such a policy will help to encourage modal shift away from standard modes of transport towards more sustainable methods and meet the rising demand for such provision as demonstrated through significant increase in sales of electric plug-in and low emission vehicles across the UK.

## **Concluding comments**

The County Council welcomes the development of the East Northamptonshire Local Plan Part 2 and remains committed to working with ENC and other partners in relation to the sustainable delivery of infrastructure provision, to ensure that current priorities and policies of the County Council and ENC are aligned in relation to the planning and delivery of new infrastructure and the ability to secure appropriate developer contributions through Section 106 to effectively mitigate the impact of development.

This collaborative approach will help to ensure that appropriate infrastructure is provided which will meet the demands of anticipated growth, creating new and expanded schools which will serve local children and be a focus for communities for the future.

I hope that the above comments are helpful in the supporting the development of East Northamptonshire's Local Plan Part 2; please do not hesitate to contact me should you have any queries regarding this response.

Yours sincerely,

