Dear Sir,

RE: Part 2 Local Plan for Corby – Regulation 19 Consultation

Submission of Northamptonshire County Council Development Management

Thank you for your notification regarding the Regulation 19 consultation on the pre-submission version of the Part 2 Local Plan for Corby 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.

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 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 Corby 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.

8. The County Council welcomes the emphasis in the Plan on delivering key infrastructure in order to support growth during the Plan period. In particular, inclusion of the need for new Primary and Secondary Schools as described in the Infrastructure Delivery Plan. Ongoing collaboration on the IDP between partners will be required to ensure it is regularly reviewed and updated.

9. The County Council supports the recognition in clause 4.6 of the vital role 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.

10. The County Council supports the inclusion of “Policy 3 – Secondary School Opportunity Site” within the Plan. As referred to above, there is a clear and demonstrable need for a new Secondary School in Corby to meet immediate and forecast demand for places. This Policy provides a mechanism to ensure that this demand can be met, and aligns with the strategic objectives of the North Northamptonshire Joint Core Strategy (JCS) and with the Plan’s proposed Local Outcomes, including Outcomes 2, 12, 13, and 14.

11. It is recommended however that further assessment of the site is undertaken to ensure that it is viable for the proposed use, and in particular further discussion with Northamptonshire Highways will be required to ensure that any potential accessibility issues are identified and addressed, both in terms of access for pupils, staff and visitors. The County Council will
continue to work with Corby Borough Council and with its partners to support refinement and implementation of Policy 3 as required.

12. In addition to the new school requirements identified in the draft Plan, a number of extensions to existing Schools will be required in the short term, to meet the immediate demand for places arising from new housing and population growth. The County Council will work with the local authority and with the ESFA to bring these forward.

13. It is noted that the draft Plan identifies a number of additional potential sites for housing allocations across both the urban and rural areas, in order to meet the adjusted target of the JCS, to provide a suitable land supply buffer, and in order to address an historic shortfall in delivery. It is also noted that a strategic opportunity for further housing development has been identified over and above the objectively assessed need for Corby borough, with potential to provide a further 14,200 dwellings in the Plan period. 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.

14. In accordance with the county council’s adopted POFG therefore, all planning applications for major development (i.e., applications for more than 10 units) will be assessed for their impact on Education infrastructure and Section 106 obligations where appropriate will be required in order to mitigate the impact of housing growth on existing services and facilities.

15. In addition to any housing allocations identified in the Plan, the County Council will continue to monitor capacity and pupil generation forecasts across the existing schools estate, and assess the ability of these facilities to adapt, expand and/or enhance existing provision where possible to mitigate the impact of development.

16. 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

17. 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.

18. 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:
19. **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.

20. **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).

21. 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.

22. 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

23. 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**

24. 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.

25. 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.

26. 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 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. 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.

29. 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

30. 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.

Concluding comments

31. The County Council welcomes the changes made to the Plan in respect of the need for additional Secondary Education provision, and remains committed to working with Corby Borough Council and other partners in relation to the sustainable delivery of schools
provision, including: the Education, Funding and Skills Agency, Free Schools, Academy Trusts, existing schools, education providers, developers and local communities.

32. Continued engagement is welcomed with CBC, particularly as the draft 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 CBC 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.

33. I hope that the above comments are helpful in shaping Corby Borough Council's Part 2 Local Plan for Corby – Pre-Submission Draft; please do not hesitate to contact me should you have any queries regarding this response.

Yours sincerely,

Senior Project Manager – Development Management
Northamptonshire County Council