

# Public Document Pack



**Meeting:** Executive

**Date:** Thursday 16th November, 2023

**Time:** 10.00 am

**Venue:** Council Chamber, Corby Cube, George Street, Corby, NN17 1QG

To members of the Executive

Councillors Jason Smithers (Chair), Helen Howell (Vice-Chair), Matt Binley, David Brackenbury, Lloyd Bunday, Scott Edwards, Helen Harrison, David Howes, Harriet Pentland and Mark Rowley

| <b>Agenda</b>                     |   |                                 |                 |
|-----------------------------------|---|---------------------------------|-----------------|
| <b>Item</b>                       | <b>Subject</b>  | <b>Member Presenting Report</b> | <b>Page no.</b> |
| <b>01</b>                         | Apologies for absence   |                                 |                 |
| <b>02</b>                         | Minutes of the Meeting Held on 12th October 2023  |                                 | 5 - 26          |
| <b>03</b>                         | Members' Declarations of Interest   |                                 |                 |
| <b>04</b>                         | Notifications of requests to address the meeting  |                                 |                 |
| <b>Items Requiring a Decision</b> |   |                                 |                 |
| <b>05</b>                         | Performance Indicator Report 2023/24 (Period 6 - September 2023)  | Cllr Lloyd Bunday               | 27 - 50         |
| <b>06</b>                         | Annual Report of the Service Delivery Contract between Northamptonshire Children's Trust and West and North Northamptonshire Councils 2022/23 and Update on the Annual Review | Cllr Scott Edwards              | TO FOLLOW       |
| <b>07</b>                         | Public Spaces Protection Order – Dog Control  | Cllr Mark Rowley                | 51 - 92         |
| <b>08</b>                         | Northamptonshire Safeguarding Adults Board Annual Report 2022-2023  | Cllr Helen Harrison             | 93 - 124        |
| <b>09</b>                         | North Northamptonshire Local Development Scheme   | Cllr David Brackenbury          | 125 - 154       |

|     |  |                        |           |
|-----|--|------------------------|-----------|
| 010 | East Northants Local Plan Part 2 Adoption  | Cllr David Brackenbury | 155 - 560 |
| 011 | Procurement of Independent Living Care and Support Provision                     | Cllr Helen Harrison    | 561 - 606 |
| 012 | Delivery of Household Waste Recycling Centres (HWRCs) from April 2025            | Cllr Matt Binley       | 607 - 732 |
| 013 | Kettering Library Roof Replacement Capital Project                               | Cllr Helen Howell      | 733 - 762 |
| 014 | Corporate Property Leasehold Policy  | Cllr Matt Binley       | 763 - 776 |
| 015 | Proposal to Relocate Wilby CE VA Primary School to the Glenvale Park Development | Cllr Scott Edwards     | 777 - 866 |
| 016 | Social Work Degree Apprentices   | Cllr Jason Smithers    | 867 - 874 |
| 017 | Local Council Tax Support Scheme 2024/25   | Cllr Lloyd Bunday      | 875 - 882 |
| 018 | Indicative Budget Timeline and Scrutiny Process 2024/25 – Update                 | Cllr Lloyd Bunday      | 883 - 896 |
| 019 | Capital Outturn Report as at Period 6  | Cllr Lloyd Bunday      | 897 - 914 |
| 020 | Half Yearly Treasury Management Update   | Cllr Lloyd Bunday      | 915 - 934 |
| 021 | Capital Programme Update 2023/24   | Cllr Lloyd Bunday      | 935 - 940 |
| 022 | Budget Forecast Update 2023-24 - Period 6  | Cllr Lloyd Bunday      | 941 - 986 |

**Urgent Items**

To consider any items of business of which notice has been given to the Proper Officer and the Chair considers to be urgent, pursuant to the Local Government Act 1972

Adele Wylie, Monitoring Officer  
North Northamptonshire Council



**Proper Officer**  
**Wednesday 8<sup>th</sup> November 2023**

This agenda has been published by Democratic Services.

Committee Administrator: David Pope

☎01536 535661

✉david.pope@northnorthants.gov.uk

## Public Participation

The Council has approved procedures for you to request to address meetings of the Council.

| ITEM                                    | NARRATIVE   | DEADLINE  |
|---|---|---|
| Members of the Public Agenda Statements | Members of the Public who live or work in the North Northamptonshire council area may make statements in relation to reports on the public part of this agenda. A request to address the Executive must be received 2 clear working days prior to the meeting at <a href="mailto:democraticservices@northnorthants.gov.uk">democraticservices@northnorthants.gov.uk</a><br>Each Member of the Public has a maximum of 3 minutes to address the committee. | 5.00pm<br>Monday 13 <sup>th</sup><br>November<br>2023 |
| Member Agenda Statements                | Other Members may make statements at meetings in relation to reports on the agenda. A request to address the committee must be received 2 clear working days prior to the meeting. The Member has a maximum of 3 minutes to address the committee. A period of 30 minutes (Chair's Discretion) is allocated for Member Statements.  | 5.00pm<br>Monday 13 <sup>th</sup><br>November<br>2023 |

If you wish to register to speak, please contact the committee administrator

### Members' Declarations of Interest

Members are reminded of their duty to ensure they abide by the approved Member Code of Conduct whilst undertaking their role as a Councillor. Where a matter arises at a meeting which **relates to** a Disclosable Pecuniary Interest, you must declare the interest, not participate in any discussion or vote on the matter and must not remain in the room unless granted a dispensation.

Where a matter arises at a meeting which **relates to** other Registerable Interests, you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but must not take part in any vote on the matter unless you have been granted a dispensation.

Where a matter arises at a meeting which **relates to** your own financial interest (and is not a Disclosable Pecuniary Interest) or **relates to** a financial interest of a relative, friend or close associate, you must disclose the interest and not vote on the matter unless granted a dispensation. You may speak on the matter only if members of the public are also allowed to speak at the meeting.

Members are reminded that they should continue to adhere to the Council's approved rules and protocols during the conduct of meetings. These are contained in the Council's approved Constitution.

If Members have any queries as to whether a Declaration of Interest should be made please contact the Monitoring Officer at – [monitoringofficer@northnorthants.gov.uk](mailto:monitoringofficer@northnorthants.gov.uk)

### **Press & Media Enquiries**

Any press or media enquiries should be directed through the Council's Communications Team to [NNU-Comms-Team@northnorthants.gov.uk](mailto:NNU-Comms-Team@northnorthants.gov.uk)

### **Public Enquiries**

Public enquiries regarding the Authority's meetings can be made to [democraticservices@northnorthants.gov.uk](mailto:democraticservices@northnorthants.gov.uk)

### **Webcasting**

Meetings of the Council will be filmed by the Council for live and/or subsequent broadcast on the Council's website. The whole of the meeting will be filmed, except where there are confidential or exempt items. A copy will be retained in accordance with the Council's data retention policy.

If you make a representation to the meeting, unless you have specifically asked not to appear on the webcast, you are taking positive action to confirm that you consent to being filmed. You have been made aware of the broadcast and entering the Council Chamber you are consenting to be filmed by North Northamptonshire Council and to the possible use of those images and sound recordings for webcasting.

If you do not wish to have your image captured, you should sit in the public gallery area that overlooks the Chamber. The Council is obliged by law to allow members of the public to take photographs, film, audio-record, blog or tweet the proceedings at public meetings. The Council will only seek to prevent this should it be undertaken in a disruptive or otherwise inappropriate manner.

The Council intends to webcast all of its public meetings held at the Corby Cube, but if it is unable to do so, for the avoidance of doubt, the meeting will continue as scheduled and decisions and minutes made available on the Council's website in the normal manner. If you have any queries regarding webcasting or the recording of meetings by the public, please contact [democraticservices@northnorthants.gov.uk](mailto:democraticservices@northnorthants.gov.uk)



## Minutes of a meeting of the Executive

At 10.00 am on Thursday 12th October, 2023 in the Council Chamber, Corby Cube, George Street, Corby, NN17 1QG

### Present:-

#### Members

Councillor Jason Smithers (Leader of the Council) (Chair)

Councillor Matt Binley

Councillor David Brackenbury

Councillor Lloyd Bunday

Councillor Scott Edwards

Councillor Helen Harrison

Councillor David Howes

Councillor Harriet Pentland

Councillor Mark Rowley

Also in attendance – Councillors Wendy Brackenbury, Matt Keane, Lyn Buckingham, Valerie Anslow, Ross Armour and Dorothy Maxwell

### 508 Apologies for absence

Apologies for absence were received on behalf of the Deputy Leader of the Council, Cllr Helen Howell.

Apologies were also received from:

- Monitoring Officer, Adele Wylie
- Executive Director of Finance, Janice Gotts

### 509 Minutes of the Meeting Held on 14th September 2023

**RESOLVED** that the Executive agreed the minutes of the meeting held on 14<sup>th</sup> September 2023 as a true and accurate record of the meeting.

### 510 Members' Declarations of Interest

No declarations were received.

### 511 Notifications of requests to address the meeting

The Chair, Councillor Jason Smithers reported that there were requests to address the meeting as set out below:

| <b>Agenda Item</b>  | <b>Speakers</b>  |
|---|--|
| Item 5 - Performance Indicator Report 2023/24 (Period 5 –August 2023)                               | Cllr Valerie Anslow                                      |
| Item 6 - North Northamptonshire Future Vision – Big50 Progress Update                               | Cllrs Dorothy Maxwell, Matt Keane and Valerie Anslow     |
| Item 7 – Northamptonshire Corporate Parenting Board Annual Report 2022-23                           | Cllr Dorothy Maxwell                                     |
| Item 8 - Local Electric Vehicle Infrastructure (LEVI) Funding                                       | Cllrs Matt Keane and Dorothy Maxwell                     |
| Item 9 – NNC Development Services and Regulatory Services Case Management Systems (CMS) Replacement | Cllr Matt Keane  |
| Item 10 – Procurement of a Heating Contractor for Housing Stock                                     | Cllr Dorothy Maxwell and Lyn Buckingham                  |
| Item 11 – Home to School Transport Dynamic Purchasing System  | Cllr Dorothy Maxwell                                     |
| Item 12 - Local Government and Social Care Ombudsman Annual Report 2022-23                          | Cllrs Dorothy Maxwell, Valerie Anslow and Lyn Buckingham |
| Item 14 - Partnership Governance Framework and Register of Significant Partnerships                 | Cllr Lyn Buckingham                                      |
| Item 15 - National Non-Domestic Rates and Housing Benefit Overpayment Write-Offs                    | Cllr Lyn Buckingham                                      |
| Item 16 - Capital Programme Update 2023/24  | Cllr Lyn Buckingham                                      |
| Item 17 - Budget Forecast 2023-24 at Period 5   | Cllr Lyn Buckingham and Dorothy Maxwell                  |

Cllr Dorothy Maxwell opted not to speak in relation to agenda items 8, 10 and 12

Cllr Lyn Buckingham opted not to speak in relation to agenda item 16.

## **512 Performance Indicator Report 2023/24 (Period 5 - August 2023)**

The Chair invited Cllr Valerie Anslow to address the meeting. Cllr Anslow noted the overall improvement in figures for children missing from education but stated that figures for absenteeism needed monitoring with support provided to schools, children and parents in relation to this issue.

The Chair then invited the Executive Member for Finance and Transformation, Cllr Lloyd Bunday to introduce a report that sought to provide an update on the performance of the Council across a range of services as measured by performance

indicators (PIs), as well as setting out the progress that was being made in the development of the Council's performance monitoring arrangements.

Cllr Bunday reported that four quarterly indicators had been missing from the report submitted to the September meeting of Executive and for completeness these were now included as part of the report before members; two of the indicators were moving in a positive direction, with two well inside tolerance levels.

The meeting heard that despite the ongoing cost of living crisis, Council Tax and Business Rates collections remained strong, with the situation continuing to be monitored closely.

The Period 5 report showed 18 indicators on or exceeding their target, with eight inside tolerance levels and seven performing below target levels. Of the PIs reported for the period, 22 had shown improvement with 11 deteriorating since the previous reporting period.

Cllr David Brackenbury spoke to welcome the indicators as providing a valuable position of the Council's performance across a number of key areas. Cllr Brackenbury referred to the positive figures relating to the Planning Service with performance above target in most areas, although further improvement work was still required.

Cllr Scott Edwards spoke to reference Cllr Anslow's comments regarding absenteeism from schools, noting that there were some very complex individual cases to take into account, although absenteeism figures would be presented to the next meeting of Executive having been considered by the Corporate Scrutiny Committee two days previously. Cllr Edwards also stated that staffing issues within the Children's Trust were behind the low figures of current cases detailed within the relevant indicator, although a plan was in place to increase the number of cases being dealt with.

## **RESOLVED**

That the Executive:

- a) Noted the performance of the Council as measured by the available indicators at Period 5 (August) 2023/24, set out in the appendix to this report.

Reason for Recommendations – to better understand the Council's performance as measured by Key Performance Indicators as at Period 5 (August) 2023/24.

Alternative Options Considered: Reporting performance data on a less frequent basis is an option but monthly reporting is considered useful at this stage of the Council's existence, reporting alongside budget information.

## **513 North Northamptonshire Future Vision - Big50 Progress Update**

The Chair invited Cllr Dorothy Maxwell to address the meeting. Cllr Maxwell stated that more councillors would have appreciated the opportunity to attend the Big50 conference held in July and hoped for the opportunity to attend the next event and be part of discussions, noting the importance of developing the future vision for the area.

The Chair then invited Cllr Matt Keane to speak on the item. Cllr Keane welcomed the report, recognising the importance of planning for the future in relation to health care for an ageing population as well as looking to grow local businesses and employment. Cllr Keane queried whether there needed to be additional focus on Artificial Intelligence (AI) and green considerations within the vision. Concluding, Cllr Keane queried how the Council would be held accountable for the actions detailed in the report.

Cllr Valerie Anslow was then invited to address the Executive. Cllr Anslow stressed that housing was a key theme missing from those identified by conference delegates. Cllr Anslow noted that decent and affordable homes needed to be given greater priority to allow for a prosperous, proactive local population.

The Chair thanked the speakers for their comments before introducing a report that sought to provide a progress update on work carried out on creating a vision for North Northamptonshire up to the year 2050. The report also provided feedback from the Big50 Conference that took place in July 2023 and recommended the development of actions to help further develop the Big50 vision and to ensure its delivery on a short, medium and longer-term timeframe.

The Chair noted the success of the Big50 conference held in July, with engagement from across the political spectrum, voluntary sector, business community, education providers and retailer sectors all feeding in to develop the Big50 vision. The work of the Big50 Steering Group was highlighted, the group overseeing development and delivery of the action plan and ensuring broader ownership and navigation critical to the success of the future vision in the short, medium and long-term timeframes.

The Chair noted that for the vision to work it required traction at this formative stage, providing an example of the work of the Principal of Tresham College in organising a skills conference for March 2024 to look at skills development in critical areas such as AI. A further Big50 conference was planned for early February 2024, which many of the attendees of the initial conference had requested.

The Chair concluded by noting that the report before members comprised an inspiring and bold vision and sought the views of the Executive.

Cllr David Brackenbury spoke to endorse the sentiments expressed by the Chair, noting that in terms of placemaking the Big50 vision would become an important strand of policies and ideas going forward. The findings of the Big50 would be reflected in the North Northamptonshire Strategic Local Plan to ensure residents had the necessary housing, jobs and infrastructure required. Cllr Brackenbury noted as an example the recent opening of the new sixth form college in Corby and thanked all those involved in the production of the vision to date.

Cllr Helen Harrison spoke to welcome the report and the progress made since the July conference, noting the importance of being able to influence the development and growth of North Northamptonshire alongside partner organisations and delivering better health and wellbeing outcomes for residents.

Cllr Mark Rowley stated that it was positive to see organisations that had not been at the Big50 conference now actively wanting to be involved in the production of the Big50 vision.

Cllr Harriet Pentland noted the vast array of attendees at the Big50 conference and the benefits of receiving such wide-ranging input on the day and via post-conference feedback. One of the key themes of the vision was to focus on looking after the environment and climate, an area that was clearly important to the wider community. Cllr Pentland stated that the vision was not Council-owned but was for everyone in North Northamptonshire and welcomed the contributions made to date.

Following debate, the Chair thanked all those who had spoken, reiterating the point that the vision was not a Council vision, but one for the whole area to buy into. The process to date had brought in a number of good ideas and stakeholders had embraced the vision which was gaining momentum. The Chair also welcomed the support of the opposition leader on the subject.

## **RESOLVED**

That the Executive:

- a) Noted the progress that has been made on developing an area-wide vision for North Northamptonshire up to 2050.
- b) Acknowledged the positive contribution made towards the development of the vision through the work of the Big50 Steering Group, the Big50 conference and all who took part in it.
- c) Endorsed the co-design of a short, medium and longer-term action plan with the Steering Group.

Reason for Recommendations – Local councils are ideally placed to act as place shapers and enablers of change in their area. North Northamptonshire Council, in its Corporate Plan adopted in December 2021, made a clear commitment to work in partnership with a wide range of organisations from public, private and voluntary sectors to help improve the quality of life in North Northamptonshire. The work on setting out a broader, longer-term vision for North Northamptonshire represents the next natural step in the achievement of this aim. A shared vision for the future of North Northamptonshire will help focus the efforts of organisations working locally on achieving a common set of priorities and goals for the area. The recommendations ensure that the work carried out to date by all entities involved progresses in a transparent, inclusive and engaging way.

Alternative Options Considered:

- i) Continue 'as is' without a wider area vision – In practical terms, this would mean continuing to focus on the Council's own vision and leave partner agencies to focus on theirs. There is nothing wrong with this approach. Indeed, there is already a lot of activity focused on aligning approaches and target outcomes which are embedded in the current ways of working. It would however leave a gap in terms of a cross-cutting, widely adopted vision for the area. Given the clear support for a wider area vision evident at the Big50 conference, failure to pursue the opportunity would represent a suboptimal position

## 514 Northamptonshire Corporate Parenting Strategy Annual Report 2022/23

The Chair invited Cllr Dorothy Maxwell to address the Executive. Cllr Maxwell stated that whilst the Corporate Parenting Board annual report was welcome, the Council still had a long way to go towards improving its work with the most deprived children in North Northamptonshire. Cllr Maxwell made reference to a historic lack of qualified social workers, noting that 25 newly qualified social workers had started since May 2023 which was considered to be a step in the right direction in ensuring every child counted. Cllr Maxwell concluded by noting that the Council needed to be more effective in ensuring it met the needs of all children, regardless of their background and hoped for an improvement to be identified in the annual report for 2023/24.

The Chair thanked Cllr Maxwell for her comments before inviting Cllr Scott Edwards, Executive Member for Children, Families, Education and Skills to introduce a report that provided the Executive with an update on the Northamptonshire Corporate Parenting Board Annual Report 2022/23. The report offered an overview of the work of the board during the previous financial year and set out four key priorities of Northamptonshire Children's Trust Corporate Parenting Strategy 2021-25, with an update submitted on the progress of each area.

In response to Cllr Maxwell's comments, Cllr Edwards noted that the report represented only looked-after children and that the 25 newly qualified social workers did not represent a total addition to staffing levels. Cllr Edwards noted the positivity of the Corporate Parenting Board report, specifically the criminal justice element and provided an open invitation to Cllr Maxwell and any interested elected member to attend future Corporate Parenting Board meetings.

The meeting heard that annual report before them would be the final joint report, the board having now disaggregated to cover North Northamptonshire and West Northamptonshire respectively with effect from May 2023. Cllr Edwards stated that the Council and its partner agencies all held responsibility for corporate parenting, putting the needs of looked-after children, young people and families at the heart of every action and decision that was taken.

It was reported that work was underway to improve health-related indicators for looked-after children, and this aspect was a key priority moving forward. In addition, it was heard that two young people had been invited to sit on the board to provide details of their experiences of the care system.

Cllr Edwards noted the proactive nature of the board and provided an overview of the meetings held, including the latest which had considered the issue of unaccompanied children arriving in the United Kingdom.

Cllr Edwards concluded by stating that the board was positive in both its intentions and commitment to its legal obligations and had produced a constructive report. Cllr Edwards also drew attention to the four priorities that formed the Corporate Parenting Strategy 2021-2025.

Cllr David Brackenbury spoke to welcome the report, noting the amount of work that had gone into its production. Cllr Brackenbury stated that a North Northamptonshire specific report would be received for 2023/24 and praised the excellent

communication and involvement of young people in the findings of the report before members.

## **RESOLVED**

### **KEY DECISION**

That the Executive:

- i) Approved the content of the Northamptonshire Corporate Parenting Board Annual Report which gives an overview of the Corporate Parenting Board's activities.
- ii) Noted that the Northamptonshire Children's Trust Corporate Parenting Strategy 2021-25 sets out four key priorities and the update on each areas progress contained in the annual report.

Reasons for Recommendations:

- To promote and monitor the Northamptonshire Children's Trust Corporate Parenting Strategy.
- To encourage all Members and employees to recognise their role as corporate parents.
- Provides members with an overview of the work of Northamptonshire Children's Trust and supports the discharge of their Corporate Parenting duties.

Alternative Options Considered – Do Nothing – The Council has statutory duties as Corporate Parent for children in care and care leavers. Whilst the role of the Director of Children's Services and Lead Member is defined in legislation there are wider corporate responsibilities on all staff and elected Members. Not approving the Corporate Parenting Annual Report would mean that the Council may fail to deliver all or parts of its statutory responsibilities in this area.

## **515 Local Electric Vehicle Infrastructure (LEVI) Funding**

The Chair invited Cllr Matt Keane to address the Executive. Cllr Keane noted the important for the Council kept up with demand for electric vehicles and ensure that there were sufficient charging points locally. Cllr Keane queried whether using a single service provider would provide the most cost-effective electricity tariff for users of charging points and how the Council would control this tariff. Cllr Keane also queried how the Council would balance demand with utilising the most appropriate locations for charging points.

The Chair thanked Cllr Keane for his comments before inviting Cllr Matt Binley, Executive Member for Highways, Travel and Assets to present a report that outlined the details of Local Electric Vehicle Infrastructure (LEVI) Funding of £2.895m provisionally awarded to the Council by the government. This funding was primarily aimed at residents who did not have access to off-street parking.

The Executive noted that the Council was required to submit a business case to government prior to 30<sup>th</sup> November 2023 to qualify for the funding. Subject to approval

of the business case, 90% of the total awarded funding would be provided to the Council.

It was reported that the Council had drafted its own Electric Vehicle (EV) Infrastructure Strategy, with a consultation on the subject having closed on 11<sup>th</sup> October. The strategy set out a blueprint for the development of EV infrastructure by the Council and other stakeholders and proposed a target of 250 public EV charging points by March 2025.

The LEVI funding, if awarded, would help to support the delivery of that strategy, with a supplier procured and appointed to supply, install, operate and maintain the EV charging points. It was noted that the successful supplier would be responsible for providing electricity, repairs, maintenance and all ongoing costs. Once this procurement had been checked by government it would result in the final 10% of funding being released.

The meeting heard that the Council had been allocated LEVI capability revenue funding to increase internal resources for planning and delivery of the strategy, with £77,220 received to date and a further payment of £175,890 expected in each of the next two financial years

Cllr Binley reported that there were currently 139 publicly available EV chargers in North Northamptonshire, below the UK average per 100,000 people, with details of an ongoing installation project were provided to the meeting.

Members heard that the Sustainable Communities Executive Advisory Panel had supported the proposed approach for LEVI funding and the Electric Vehicle Infrastructure Strategy was due for consideration by the Place and Environment Scrutiny Committee at the end of October.

Cllr Binley highlighted the wide-ranging environmental benefits associated with the proposal and thanked the government for its support in helping to fund the delivery of this vital infrastructure within North Northamptonshire.

## **RESOLVED**

### **KEY DECISION**

That the Executive

- i) Welcomed the award for LEVI Capital Funding and identification of North Northamptonshire as a Tranche 1 area
- ii) Delegated authority to the Executive Member for Highways, Travel & Assets, in consultation with the Executive Directors for Place & Economy and Finance, to agree the submission of a LEVI Business case to Government following the approach set out in this report and the principles outlined in Appendix A of the report
- iii) Subject to Government approval of the LEVI Business Case, delegated authority to Executive Member for Highways, Travel & Assets, in consultation with the Executive Director for Place and Economy and Executive Director for



Finance and Performance, to procure a provider to supply, install, operate and maintain a network of publicly available electric vehicle charging points across North Northamptonshire

- iv) Following Government review of the tender process and contract documents, delegated authority to the Executive Member for Highways, Travel & Assets, in consultation with the Executive Director for Place and Economy and Executive Director for Finance and Performance, to agree appointment of a preferred supplier and signing of related contracts and agreements
- v) Noted the recent public consultation on the Council's draft Electric Vehicle Infrastructure Strategy which closed on 11th October 2023
- vi) Delegated authority to the Executive Member for Highways, Travel & Assets, in consultation with the Executive Member for Climate Change & the Green Environment and the Executive Director for Place & Economy to consider the responses to the recent consultation on the draft strategy and approve the final version for publication

Reasons for Recommendations: The recommendations will enable the Council to submit a business case to Government which will secure the provisional LEVI Capital allocation, undertake a procurement process using the capital funding to secure private sector investment to install, operate and manage a publicly accessible EV chargepoint (EVCP) network across North Northamptonshire, and appoint a successful supplier. The recommendations will also enable the council's Electric Vehicle Infrastructure Strategy to be approved following consideration of responses to the recent public consultation.

Alternative Options Considered: There are two main alternatives to the recommended approach. Firstly, the Council could decide to delay submitting a business case beyond 30<sup>th</sup> November 2023. This would mean that it would be submitted at a later date and NNC would be moved to Tranche 2 rather than Tranche 1. A delayed procurement could place NNC in a more difficult procurement environment as the capacity of Charge Point Operators could be more limited by local authority contracts already awarded elsewhere. Secondly, the Council could decide not to submit a business case. It is likely that this approach would result in the funding allocation being directed to other local authority areas. This would mean that there would be very little opportunity for the Council to attract additional investment to expand the provision of publicly accessible EVCPs beyond areas which are commercially attractive.

## **516 NNC Development Services and Regulatory Services Case Management Systems (CMS) Replacement**

The Chair invited Cllr Matt Keane to address the Executive. Cllr Keane stated that it was essential for the Council to have a Case Management System (CMS) for Development and Regulatory Services that was fit for purpose and future-proof, allowing the Council to undertake detailed data analysis, especially in relation to complaints. Cllr Keane queried how future-proofing opportunities could be recognised during the procurement process and how the Council would implement testing of the new system to ensure a smooth introduction.

The Chair thanked Cllr Keane for his contribution before inviting Cllr David Brackenbury, Executive Member for Growth and Regeneration to introduce a report that sought to appraise the Executive of the options available to procure and implement a new single CMS, to replace the Council's seven legacy systems due to the current contracts expiring, without further opportunity to extend, on 31<sup>st</sup> March 2024.

The proposal before the Executive was to procure a single cloud-hosted Idox solution with the contract in place by 31<sup>st</sup> March 2024. Implementation of the system would then commence in a phased approach over the following 18-to-24-month period, during which time testing would be undertaken.

The meeting noted that the report contained a recommendation to Full Council to approve use of Transformation Reserves specifically set aside to cover one-off implementation costs of up to £600,000.

Cllr Brackenbury noted that the new system would allow the Council to work more efficiently, providing data accuracy on a single system rather than the complex current position of seven legacy systems.

The Chair spoke to welcome the proposal and the opportunity to bring additional efficiency to the organisation. Cllr Matt Binley also spoke to welcome the report.

## **RESOLVED**

### **KEY DECISION**

That the Executive:

- a) Approved the commencement of the procurement process via the Crown Commercial Services Vertical Application (VAS) Framework, reference Page 162 RM6259, using a Direct Award to purchase and implement a single cloud hosted Idox Case Management System for North Northamptonshire Council.
- b) Recommended to Full Council:
  - i) The approval of the use of the Transformation Reserve to fund the one-off implementation costs of up to £600,000
  - ii) The approval of the inclusion of the ongoing annual revenue savings of £40,400 resulting from the implementation of the new Case Management System in the Medium-Term Financial Plan (MTFP)
- c) Delegated authority to the Executive Member for Growth & Regeneration in consultation with the Executive Director of Place and Economy and the Chief Information Officer to take any further decisions and/or actions required to conclude this procurement process. This will include, but not be limited to:
  - Approving award of the contract to the preferred supplier
  - Finalising the Terms and Conditions of the service
  - Enter into a contract with the preferred supplier for the provision of the service

Reasons for Recommendations:

- Expiry of the incumbent contracts – the current system contracts expire 31<sup>st</sup> March 2024.
- NNC will gain significant benefits from having a single CMS. Levels of service will be improved, and process efficiencies implemented.

Alternative Options Considered:

- Do Nothing
- Do Minimal - Replacement Solution for Kettering
- New supplier single solution

All the alternative options shown above have been discounted as they do not provide an effective solution, for reasons set out in section 5 of this report.

## **517 Procurement of a Heating Contractor for Housing Stock**

The Chair invited Cllr Lyn Buckingham to address the meeting. Cllr Buckingham queried apprenticeships within the gas servicing area with a view to the Council producing its own technicians. Cllr Buckingham also made reference to the checking of fire and carbon monoxide alarms in Council properties and the possibility of adopting a risk register to be updated by contractors entering properties to ensure tenants were safe and warm and allowing the Council to better understand the condition of its properties.

The Chair thanked Cllr Buckingham for her contribution before inviting Cllr Mark Rowley, Executive Member for Housing, Communities and Levelling-Up to introduce a report that sought approval for the procurement of a contractor for the delivery of the servicing, repairs and maintenance of heating systems for Housing Property Services.

Cllr Rowley reported that historically the Corby housing stock had used external heating contractors, with Kettering housing stock heating systems maintained internally. The proposal before the Executive would see an external contractor procured for servicing, repairs and maintenance for the Council's entire housing stock, while the installation of new boilers and void heating works would continue to be delivered in-house.

It was reported that gas safety apprentices took three to four years to train, not a process that could be sped up for safety reasons, but the Council did offer apprenticeships in this regard. It was heard that carbon monoxide checks already formed part of annual safety checks.

Cllr Edwards spoke to note that apprenticeships offered a great opportunity for those in care and care-leavers, referring to the fact that this was now a protected characteristic.

Evonne Coleman-Thomas, Assistant Director of Strategic Housing, Development and Property Services spoke to note that contractors would raise any safeguarding issues identified at Council properties and also that a three-year programme would be

undertaken to enter and assess all properties to identify any works or support required.

Cllr Matt Binley spoke to note the difficulty of recruiting and retaining staff in the service area and welcomed the proposal as a positive step at the current time.

## **RESOLVED**

### **KEY DECISION**

That the Executive delegated authority to the Executive Member for Housing, Communities and Levelling Up in consultation with the Executive Director for Adults, Health Partnerships and Housing, to procure, negotiate, award, and enter into a contract for the servicing, repairs and maintenance of the Council's Housing Heating Systems, to ensure that the Council's housing stock is maintained and that the legal obligation to annually service gas and oil appliances is met.

Reasons for Recommendation: By approving this recommendation, Council officers will be able to: -

- Closely align services with Government legislation, regulation and initiatives, through the use of a procured contractor across the two Housing Property Services team areas.
- Ensure a fully compliant procurement process is conducted in the most efficient and timely manner and a new contract is in place for the delivery of the services.
- Provide better value for money to the Council.
- Ensure tenants benefit from the delivery of this statutory service in the housing stock across North Northamptonshire.

Alternative Options Considered:

- Continue with existing separate systems for both Corby and Kettering teams. This option is not recommended as it would not result in a joined-up team working across North Northamptonshire.
- Set up an in-house Gas team covering all NNC Council Homes. This option is not recommended due to the current difficulties in recruiting to vacant posts within the in-house Kettering team. Operating an in-house service with an even higher number of agency staff than at present would come with significant risks to delivery.
- Procure a contractor to provide a service to all NNC Council Homes for all of the different parts of the Gas service. This option is not recommended as there were a number of benefits identified to retaining the installation of new boilers and void gas works in-house. Mainly, that there was no identified financial benefit from new boiler installations being contracted out as opposed to being completed in-house and the loss of direct control of void works, that could lead to an impact on voids performance

## 518 Home to School Transport Dynamic Purchasing System

The Chair invited Cllr Matt Binley, Executive Member for Highways, Travel and Assets to introduce a report that sought approval to make a direct award to procure a standalone contract for the Home to School Transport dynamic purchasing system known as “adam” with effect from 1<sup>st</sup> April 2024.

It was reported that the system, provided by the Access Group, was utilised to allocate qualifying children free home to school transportation, the transport being delivered by external suppliers. The Council also provided transport for the Northamptonshire Children’s Trust, paid for by the Trust.

The current arrangement was a shared Dynamic Purchasing System led by West Northamptonshire Council (WNC), with the contract due to end on 31<sup>st</sup> March 2024, with the option to extend for two further one-year periods. However, as this was a joint contract with WNC as the lead, only that authority could seek a contract extension and it was not known whether WNC would seek to do so.

Cllr Binley outlined challenges faced by the current shared system, noting that by procuring a contract specifically for North Northamptonshire Council there would be a number of advantages, including area specific suppliers and no requirement to disaggregate invoices each month. A single system for the Council would also provide improved monitoring of forecasting and spend for the service.

It was heard that by awarding the contract to the current supplier through a Direct Award under the YPO Framework, staff would already be familiar with the system, preventing the need for additional training or downtime and allowing adequate time to prepare and develop requirements that would provide a smooth transition prior to the current contract expiring.

The meeting noted that there were currently no other current packages listed on the framework meeting the Council’s needs, undertaking a full procurement exercise would take longer than the remaining contract time and require extensive development and data migration.

The Executive heard that increased costs for a standalone service could be absorbed within the current budget, but there were also possible savings to be realised from utilising local service providers. The overall cost to award to Access Group over a 3-year period would be a total of £153,395, with any increased use of local service providers helping reduce the Council’s carbon footprint. The Council would also have the opportunity to operate its own contracts and therefore could include maximum emission targets for supplier vehicles.

Cllrs Lloyd Bunday and Scott Edwards spoke in support of the recommendations, noting that the time was right for the Council to move forward with its own contract that was localised and focussed on environment benefits.

Cllr David Brackenbury spoke to welcome the genuine financial savings that had been identified as part of the proposal and the reduction of the Council’s carbon footprint resulting from improved working practices.

## RESOLVED

### KEY DECISION

That the Executive:

- i) Authorised a Direct Award of a contract with the Access Group under the YPO Framework for the Dynamic Purchasing System known as “adam”, to facilitate ongoing procurement of home to school transport and related services.
- ii) Delegated authority to the Executive Member for Highways, Travel and Assets in consultation with Executive Director of Place and Economy to take any further decisions and/or actions required to conclude the procurement process, appoint the preferred supplier and enter into respective contracts for the delivery of Home to School transport and related services.

Reasons for Recommendations:

- a. This proposal will facilitate the disaggregation of the financial processes from WNC, giving the Council better monitoring of forecasting and spend and is a key part of the Transformation of the service to meet the needs and requirements of the Council.
- b. Taking its own contract under a Direct Award from the YPO Framework would allow the Council to work with the DPS provider to further optimize the system to meet the specific needs of North Northamptonshire as a standalone Council, rather than compromise to meet needs of the two councils together.
- c. Taking this decision at this time allows sufficient time to prepare and develop the market and ensures that there is an ongoing process and platform for procurement after the expiry of the current term of the DPS contract. This gives a degree of certainty to both the Council and the service providers contracting with it and helps to ensure that the Council can continue to meet its statutory obligations after April 2024.
- d. Alternative procurement provisions would need extensive development and potentially data migration to similarly meet the Council’s needs. There is no guarantee that the current service providers would be prepared to sign up to a different platform, or that the potential new platform can replicate the levels of operational service provided within the current DPS platform.
- e. Transitioning to a new system without sufficient lead in time to support providers is likely to lead to procurement and service issues. Providers will need to be supported in changing their processes to support the new ways of working which could lead to greater engagement from officers to ensure effective service delivery and contract management. The launch of a new system without adequate support may deter providers from bidding for routes in the future.
- f. The increased cost of the proposal is minimal against the overall budget for Home to School Transport and can be absorbed within it. There is potential for

savings from utilising more local service providers to off-set the additional costs.

- g. Re-development of the current service to include more local service providers and resolve current finance issues would incur additional costs which need to be considered against the time remaining in the current contract.

Alternative Options Considered:

- a) Do nothing: The current contractual arrangement under the DPS will expire at the end of March 2024, subject to any extensions undertaken by WNC. If the contract is allowed to expire without any action being taken, the Council will have no process for procuring Home to School and social care transport. This will leave the Council unable to meet its statutory responsibilities in this area.
- b) Undertake a full procurement exercise to identify an alternative system that may meet the Council's needs. Soft market testing has not identified a system that would be able to immediately meet the Council's needs without further development of both the system and Council's processes and internal systems within the timescales required.

**519 Local Government and Social Care Ombudsman Annual Report 2022-23**

The Chair invited Cllr Valerie Anslow to speak. Cllr Anslow made reference to areas that the Council needed to improve upon in order to reduce the number of complaints, noting comments from the Local Government and Social Care Ombudsman (LGSCO) in relation to the timetables of complaints not being adhered to and a total of 12 complaints being upheld against the Council which resulted in reputational damage. Cllr Anslow queried how the Council would respond to the Children's Trust in regard to complaints made against the Trust

Cllr Lyn Buckingham was then invited to address the meeting. Cllr Buckingham spoke to note that the basics needed to be in place to prevent complaints and referred to the LGSCO joining with the Housing Ombudsman to produce a joint report going forward.

The Chair thanked the speakers for their comments before introducing a report the purpose of which was to present the annual letter of the Local Government and Social Care Ombudsman that detailed complaints that had been received as a final stage for complaints regarding councils and social care after the Council's own complaints procedure had been exhausted.

It was reported that Children's Services was the area showing the largest increase in complaints that reflected the complex nature of the national situation regarding this service area

The Chair stated that although the level of complaints received by the Ombudsman was low in the context of the authority's scale, the Council had a duty to reduce these instances as far as possible. To this end, corporate awareness of complaints had been raised and training undertaken with a view to reducing the number of complaints going forward.

The Chair stated that the report had been considered by the Council's Scrutiny Commission at its meeting on 10<sup>th</sup> October 2023 and referred to the Executive without comment.

Cllr Helen Harrison spoke to note that it would be unrealistic to expect no complaints to be raised to the Ombudsman given the number of residents the Council served. Adult Social Care complaints were low compared to comparable authorities which provided a small level of assurance that complaints were being managed well.

Cllr Scott Edwards noted the increase in complaints relating to Children's Services and referenced the amount of work the team undertook to deal with questions and queries relating to its service area with a view to reducing the number of complaints received.

Cllr David Brackenbury spoke to note that the Council could not be complacent in regard to complaints and praised the work of staff in resolving issues prior to escalation to the Ombudsman.

## **RESOLVED**

That the Executive noted the content and recommendations of the Local Government and Social Care Ombudsman's annual review letter, and the outcomes of its investigations completed in 2022-23 that relate to the Council.

Reason for Recommendation: To appraise the Executive of the annual review letter and relevant information. Receipt of regular complaints data demonstrates good governance.

Alternative Options Considered: It would not be considered good practice to not provide the annual Ombudsman report to the Executive and as such there are no alternative options to be considered.

## **520 Oakley Vale Infrastructure Works**

The Chair invited Cllr Matt Binley, Executive Member for Highways Travel and Assets to present a report that sought approval to progress the adoption of the roads and infrastructure in Oakley Vale, Phase 5 in Corby. The report detailed the risks to the Council and why the works were required to bring the roads up to required standard to be adopted and how this would be funded.

It was noted that the former Corby Borough Council (CBC) had entered into an infrastructure stakeholder agreement with various parties. As a result of the contractor going into administration, CBC had entered into a supplemental agreement to fulfil the contractor's obligations.

The majority of the infrastructure works had been completed, the Council needing to complete works to the highway so that the roads could be adopted. The Council therefore intended to recover the full cost of the works by drawing down the £971,350 from the work deposit account held by a third-party solicitor, and for this to be added to the Capital Programme.



It was reported that a number of remedial works needed to be completed at the site including repairs to the drainage and a redesign of an existing roundabout. Once completed a further inspection would be undertaken to confirm any other outstanding works before the final resurfacing of the roads.

The current budget costs from the Council's contractor were less than that currently held in the works deposit, consequently there should be no financial impact to the Council. As part of the adoption process a commuted sum would be paid from the works deposit for the future maintenance of streetlighting and verges

## **RESOLVED**

### **KEY DECISION**

That the Executive:

- a) Noted the obligations on NNC to progress the adoption of roads and infrastructure on the Oakley Vale development.
- b) Approved that the budget of £971,350, as per the value of the external works deposit held, be added to the Capital Programme to allow works to road adoptions at Oakley Vale Phase 5.
- c) Delegated authority to the Executive Member for Highways, Travel & Assets in consultation with the Executive Director for Place & Economy to procure the necessary remedial works to the road and infrastructure at Oakley Vale Phase 5 and recover these costs from the external works deposit.

Reasons for Recommendations:

- To fulfil the obligations entered into by CBC, completing the works and spending the external monies in accordance with the Infrastructure Works Agreement and supplemental agreements to progress the adoption of roads and infrastructure.
- To procure and undertake the required works in line with the Council's constitution and financial regulations in relation to governance.

Alternative Options Considered: The only other option available is to do nothing, however given the legal obligations on the Council, as the works deposit covers the budget cost of the works and because of the negative public perception if adoption was not progressed, this option is not recommended.

## **521 Partnership Governance Framework and Register of Significant Partnerships**

The Chair invited Cllr Lyn Buckingham to address the Executive. Cllr Buckingham spoke to welcome the approach taken in regard to the Partnership Governance Framework and the clarity around partnerships with the Council, although slight concerns were raised as to which bodies or organisations might partner with the Council going forward.

The Chair then invited Cllr Lloyd Bunday, Executive Member for Finance and Transformation to introduce a report that sought approval of the Partnership Governance Framework and provided an update on the progress of creating the Register of Significant Partnerships.

It was noted that the Council was a key member of a number of partnerships with other public sector bodies, as well as the private and voluntary sectors, with these partnerships supporting the delivery of the Council's corporate strategy. To maintain an overview of these partnerships and to aid officers and members involved in such arrangements, the framework had been drafted and a register created.

Cllr Mark Rowley spoke to support the recommendations within the report.

## **RESOLVED**

### **KEY DECISION**

That the Executive:

- a) Approved the adoption of the Partnership Governance Framework as a policy that forms part of the assurance framework for the Council; and
- b) Approved the proposed next steps with regard to progressing the work on the Register and ensuring an annual cycle of self-assessment.

Reason for Recommendations: These recommendations are made to support improved assurance around partnerships as part of the Council's assurance framework.

Alternative Options Considered: The alternative option of not introducing the Partnership Governance Framework has been rejected as it will not improve assurance or support risk management in areas where the Council has significant risks because partnership services are delivering statutory obligations/key objectives and/or overseeing the expenditure of significant resources.

## **522 National Non-Domestic Rates and Housing Benefit Overpayment Write Offs**

The Chair invited Cllr Lyn Buckingham to address the Executive. Cllr Buckingham spoke to note the level of work that would have been undertaken prior to a decision being made to approve debt write-offs. A number of the cases were legacy issues dating back before unitarisation and the cost implications of chasing debts such as those contained within the report was understood.

The Chair then invited Cllr Lloyd Bunday, Executive Member for Finance and Transformation to introduce a report that requested approval for the write-off of eight debts considered unrecoverable despite numerous attempts at collection. It was noted that the Council had a duty to maximise revenue collection, however, there were circumstances where debts were deemed unrecoverable.

Cllr David Brackenbury spoke to note the level of work that went into attempting to collect debts prior to any decision being made to write-off the debt and thanked officers involved for their efforts.

## **RESOLVED**

That the Executive reviewed and approved the proposed write off of outstanding debts as summarised in Appendix A of the report.

Reason for Recommendation: The Council's Constitution (Financial Procedure Rules) requires the approval of Executive to write off debt in excess of £25,000. It is considered that this debt cannot be recovered.

Alternative Option Considered: The alternative option would be to periodically review and pursue the debt. However, following the action already undertaken and the status of the organisations, it is considered irrecoverable at this time and would not be economical to continue to pursue.

### **523 Capital Programme Update 2023/24**

The Chair invited Cllr Lloyd Bunday, Executive Member for Finance and Transformation to introduce a report that requested approval for capital schemes that had come forward for inclusion in the Council's Capital Programme. Approval of the funding would allow the schemes to move forward to procurement and delivery.

Three schemes were highlighted as per the report and recommendation below.

## **RESOLVED**

### **KEY DECISION**

That the Executive:

- i) Approved the following changes into the capital programme:
  - a. Oakley Vale, Corby Highway Adoption - £971k – budget approval for £971k, £495k in 2023/24, £476k in 2024/25 which is to be funded from external funds as part of the initial Infrastructure Agreement.
  - b. North Northamptonshire Electric Vehicle Infrastructure Project (NNEVI) £2.90m - £285k in 2024/25, £810k in 2025/26 and £1.8m in 2026/27 which is to be funded from an external grant.
  - c. Integrated Transport Block 2023/24 – reduction to existing capital scheme of £184k to align the scale of the programme with the confirmed grant funding from the Department of Transport.

Reasons for Recommendations: These are set out in greater detail within section 5 of the report but can be summarised as:

- To support the statutory delivery of school places and SEND school places across North Northamptonshire.
- To meet corporate plan objectives, for instance in leading in improving the local environment

#### Alternative Options Considered:

- As all the schemes in this report are grant funded/S106 funded, the use of the funding is in line with the agreements, so there are no alternative option proposed in this report.
- Where individual schemes are over £500k, individual reports are presented elsewhere on the agenda that set out the wider options that were considered before reaching the proposed schemes identified for grant funding.

## **524 Budget Forecast Update 2023-24 - Period 5**

The Chair invited Cllr Lyn Buckingham to address the meeting. Cllr Buckingham spoke to raise concerns regarding efficiency savings listed as part of the report and the specific services areas relating to these.

Cllr Dorothy Maxwell was then invited to address the Executive. Cllr Maxwell spoke to make reference to the budgetary pressure of £129,000 in relation to educational psychologist trainees and increased bursary payments. Cllr Maxwell queried what happened once trainees qualified and how long they were expected to remain working for the Council following qualification.

The Chair thanked the speakers for their attendance before inviting Cllr Lloyd Bunday, Executive Member for Finance and Transformation to introduce a report that set out the forecast outturn position for the Council based on the Period 5 monitoring forecasts for the General Fund, Housing Revenue Account (HRA) and the Dedicated Schools Grant. The meeting heard that the overall forecast for the General Fund, as at Period 5, was a forecast overspend of £7.821m based on the emerging data for 2023/24.

Cllr Bunday noted that there remained uncertainty regarding the staff pay award that was yet to be agreed for 2023/24. Cllr Bunday reported on a number of budgetary movements across the Council's service areas, noting that the biggest financial risk to the Council was the challenge of demand-led services.

Cllr Bunday stated that the annual budget for the PPP Shaw contract for the provision of six residential care homes across North Northamptonshire for the over 65s was £9.8m. A pressure was forecast of £970,000 in relation to this contract. A further pressure of £2.25m was reported in regard to independent care spend including residential and nursing care for both 65+ year old and 18-64 years old clients.

The meeting noted that the Children's Trust overspend for the current year had risen to £23.089m, with the Council's share being £10.196m. Although the Trust continued to look at mitigations there was a risk that the position could worsen before the end of the financial year.

The Council's overall outturn forecast for the Housing Revenue Account was reported as being an overspend of £15,000.

It was also reported that the Dedicated Schools Grant had a forecast pressure of £4.955m, with pressures relating to the high needs funding block that supported SEND provision. The remaining reserves of £700,000 had been utilised to mitigate this.

Cllr Helen Harrison spoke to reference the pressures building within Adult Social Services, with inflation affecting PPP contracts and an unprecedented increase in service demand. It was noted that there was a need to understand whether the increase was a temporary occurrence or permanent and how this could be managed in future.

## **RESOLVED**

That the Executive:

- a) Noted the Council's forecast outturn position for 2023/24 as summarised in Section 4, alongside the further analysis, risks and other considerations as set out in Section 5 to Section 7 of the report.
- b) Noted the assessment of the current deliverability of the 2023/24 savings proposals in Appendix A.

Reason for Recommendations – to note the forecast financial position for 2023/24 as at Period 4 and consider the impact on this year and future years budgets.

Alternative Options Considered: The report focuses on the forecast revenue outturn against budget for 2023/24 and makes recommendations for the Executive to note the current budgetary position as such there are no specific choices within the report.

---

Chair

---

Date

The meeting closed at 12.04 pm

This page is intentionally left blank

# Agenda Item 5



## EXECUTIVE 16<sup>th</sup> November 2023

|                      |   |
|----------------------|---|
| <b>Report Title</b>  | <b>Performance Indicator Report 2023/24 (Period 6 – September 2023)</b>   |
| <b>Report Author</b> | Tom Barden, Head of Performance, Intelligence and Partnerships <a href="mailto:Tom.Barden@northnorthants.gov.uk">Tom.Barden@northnorthants.gov.uk</a> |
| <b>Lead Member</b>   | Cllr Lloyd Bunday, Executive Member for Finance and Transformation  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

**Appendix A** – Detailed Performance Indicator Report Period 6 2023/24 (September/ Quarter 2 2023)

**Appendix B** - Workforce Data Period 6 2023/24 (September / Quarter 2 2023)

#### **1. Purpose of Report**

---

- 1.1. To provide an update on the Council's performance across a range of indicators as measured by the Council's suite of Key Performance Indicators for Period 6 (September / Quarter 2) 2023-24.

#### **2. Executive Summary**

---

- 2.1. This report provides an assessment of the Council's performance in respect of the Key Performance Indicators for 2023/24 as at period 6.
- 2.2. A detailed assessment of the performance of services as measured by key performance indicators for period 6 has been included as **Appendix A**.

- 2.3. Workforce data for period 6 is provided within **Appendix B**.

### **3. Recommendations**

---

- 3.1. It is recommended that the Executive note the performance of the Council as measured by the available indicators at Period 6 (September / Quarter 2) 2023/24, set out in the appendices to this report.
- 3.2. Reason for recommendations – to better understand the Council's performance as measured by Key Performance Indicators as at Period 6 (September / Quarter 2) 2023/24.
- 3.3. Alternative Options Considered: Reporting performance data on a less frequent basis is an option but monthly reporting is considered useful at this stage of the Council's existence, reporting alongside budget information.

### **4. Report Background**

---

- 4.1. A detailed assessment of the performance of services as measured by Key Performance Indicators for period 6 has been included as **Appendix A**. This includes comments / exception reports on each of the performance indicators reported.
- 4.2. 101 Key Performance Indicators are reported for this period, of which 46 are reported on a monthly basis, 54 on a quarterly basis and 1 on a half-yearly basis.
- 4.3. The list of Key Performance Indicators, to be reported throughout this financial year (2023-24) was approved by the Executive Committee at their meeting on the 16<sup>th</sup> March and can be found in item 405 ([Performance Management and Reporting Arrangements 2023-24](#)).
- 4.4. Workforce Data for period 6 has been provided as **Appendix B**. The format and presentation of this data will continue to develop and evolve over time to ensure it is meaningful for members to accurately inform strategic decision making moving forward.
- 4.5. Queries raised by Members on the content of this report will be responded to within 12 working days of the Executive meeting, as agreed with the Executive Member for Finance and Transformation.

### **5. Issues and Choices**

---

- 5.1. It is important that the format and presentation of performance data meets the needs of its audience. Therefore, the Council will always welcome any feedback and/or suggestions on how the performance report could be further developed to help facilitate understanding and performance improvement.



- 5.2. It is envisaged that additional indicators will be added to the Key Performance Indicator set as time goes on. Any changes to indicators will be reported to the Executive and Corporate Scrutiny committee.

## **6. Next Steps**

---

- 6.1. To continue to develop and embed a strong performance management framework and culture at North Northamptonshire Council.
- 6.2. To continue to embed and review the suite of Key Performance Indicators so that the Council can more effectively measure how it is performing against its vision and key commitments outlined within its Corporate Plan.

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

- 7.1.1. Performance monitoring allows the Council to drive continuous improvement for North Northamptonshire and identify areas of concern early. Services that submit data returns have many projects that are subject to the Council's Transformation Plan. Accurate and consistent corporate performance data may also assist the compilation of, and aid the success of, external funding bids.
- 7.1.2. This report should be read alongside the Budget Forecast 2023/24 monthly reports once available. By considering both reports together, a broader view of the Council's performance and the relationship between resource allocation and service delivery can be understood.

### **7.2. Legal and Governance**

- 7.2.1. The Council is required to provide statutory monitoring and funding returns to central government departments and their agencies. The Council is currently on course to comply with these requirements. Note that the workload and deadlines for achieving these statutory and mandatory deadlines can prove challenging, particularly where returns are significantly increasing in complexity (this is currently the case for Adult Social Care and Education returns).
- 7.2.2. Monitoring performance is a key element of the Council's Governance Framework. The Council has made performance measurement and management a priority and views it as central to both Council transparency and to the Council's improvement agenda. The Council has adopted a written [Performance Management Framework](#) which describes its principles and processes for Performance Management.

### **7.3. Relevant Policies and Plans**

7.3.1. Effective performance management directly contributes to the delivery of the key commitments set out within the Council's Corporate Plan.

### **7.4. Risk**

7.4.1 There are a number of risks relating to performance information:

(a) Poor data quality – Inaccurate data will inevitably lead to less accurate decision making.

(b) Lack of data – Failing to measure key service activities can leave the Council without a clear view of its performance. This prevents the effective oversight of key services, including those affecting the safety and wellbeing of residents.

(c) Incorrect interpretations – Caution should be applied to the interpretation of performance data, particularly given the adjustments that have been made by services to adapt when there was a COVID pandemic. Misunderstanding the performance picture can lead to ineffective decision-making, reputational damage, and inaccurate resourcing.

### **7.5. Consultation**

7.5.1. Formal consultation was carried out in the development of the Corporate Plan.

7.5.2. Informal consultation with relevant stakeholders, including Executive Members and Scrutiny Members (through the scrutiny committees) was completed for the Key Performance Indicators included in this report and for the development of the new suite of Key Performance Indicators for 2023/24.

7.5.3. Informal consultation with relevant stakeholders will continue to take place as we continue to develop the Council's Performance Management Framework.

### **7.6. Consideration by Executive Advisory Panel**

7.6.1. This report serves as information in respect of the Council's performance for Period 6 (September / Quarter 2) 2022/23, therefore consideration by the Executive Advisory Panel was not necessary.

### **7.7. Consideration by Scrutiny**

7.7.1. Performance reports will be considered by future meetings of the Corporate Scrutiny Committee, following reports to the Executive.

## 7.8. Equality Implications

7.8.1. Equality-related performance indicators are in development.

## 7.9. Climate and Environment Impact

7.9.1. The Council continues to develop its set of indicators that provide information about how it is meeting its key commitment to helping deliver a green and sustainable environment.

7.9.2. For 2023-24, the Council is measuring and reporting on the following Green, Sustainable Environment key performance indicators:

| Indicator Reference Number | Indicator Name   | Frequency              |
|----------------------------|--|------------------------|
| GSE01                      | Number of E-Scooter trips  | Quarterly              |
| GSE02                      | Number of E-Scooter users  | Quarterly              |
| GSE03                      | Co2 savings from E-Scooters                                      | Quarterly              |
| GSE04                      | Number of electric vehicle charging points publicly available    | Quarterly (in arrears) |
| GSE05                      | Number of electric vehicles per charge point                     | Quarterly (in arrears) |
| GSE06                      | Fly tipping: number of fly tips reported                         | Quarterly (in arrears) |
| GSE07                      | Percentage of waste diverted from landfill                       | Quarterly              |
| GSE08                      | Co2 saving from Delivery Robots                                  | Quarterly              |
| GSE09                      | Volume of pesticides used within NNC grounds services operations | Quarterly              |
| GSE10                      | Habitat area improved for pollinators (hectares)                 | Annually               |

7.9.3. The Assets & Environment service area have developed a Carbon Management Plan which was considered and approved by Executive at their meeting on 22<sup>nd</sup> December 2022. The Tree Management and Care Policy and Pollinator Strategy was considered and approved by the Executive at an earlier meeting on 25<sup>th</sup> August 2022. These policies will consider the Council's commitment to achieving Net Zero by 2030 and provide appropriate performance indicators to measure progress to achieving this target. This will include indicators that measure the councils carbon emissions along with

other environmental projects currently being developed.

#### 7.10. **Community Impact**

7.10.1. Effective policy and decision-making, and scrutiny, guided by good quality, timely and relevant performance data can make a significant difference to the delivery of public services and therefore have an equally significant impact on the local communities.

#### 7.11. **Crime and Disorder Impact**

7.11.1. No crime and disorder impacts have been identified.

### **8. Background Papers**

---

8.1. [Performance Indicator Report Period 5 \(August\) 2023-24](#) reported to the meeting of the Executive on 12<sup>th</sup> October 2023.

8.2. [Performance Management and Reporting Arrangements 2023-24](#) reported to the meeting of the Executive on 16<sup>th</sup> March 2023.

8.3. The Corporate Plan, reported to the meeting of the [Executive on 18<sup>th</sup> November 2021](#), adopted by Council on 1<sup>st</sup> December 2021.

## North Northamptonshire Council Performance Report - September / Q2 2023

### Key to Performance Status Colours

| Progress Status Key:   |
|--|
| Green - On target or over-performing against target  |
| Amber - Under-performing against target but within 5% corporate tolerance (or other agreed tolerance as specified) |
| Red - Under-performing against target by more than 5% (or other agreed tolerance as specified)                     |
| Dark Grey - Data missing   |
| Grey - Target under review   |
| Turquoise - Tracking Indicator only  |
| Children's Trust Progress Status Key:  |
| Green - At target or better  |
| Amber - Below target - within tolerance  |
| Red - Below target - outside tolerance   |
| Grey - No RAG  |

| Direction of Travel Key  |  |
|--|--|
| An acceptable range = within 5% of the last period's performance |  |
| ↑G   | Performance has improved from the last period – Higher is better   |
| ↓G   | Performance has improved from the last period – Lower is better  |
| ↑  | Performance has deteriorated but is still on or above target or within an acceptable range of 5% of the last period – Lower is better  |
| →  | Performance has stayed the same since the last period  |
| ↓  | Performance has deteriorated but is still on or above target or within an acceptable range of 5% of the last period – Higher is better |
| ↑R   | Performance has deteriorated from the last period – Lower is better  |
| ↓R   | Performance has deteriorated from the last period – Higher is better   |
| ↑  | Actual increased - neither higher or lower is better   |
| ⇌  | Actual has stayed the same since the last period - neither higher or lower is better   |
| ↓  | Actual decreased - neither higher or lower is better   |

| Children's Trust Direction of Travel Key |                                       |
|--|---------------------------------------|
| ↑G                                       | Performance improved since last month |
| →  | Performance the same as last month    |
| ↓A                                       | Performance declined since last month |

### Performance Terminology key

|                               |  |
|-------------------------------|--|
| TBC                           | To be confirmed  |
| TBD                           | To be determined   |
| n/a                           | Not applicable   |
| Actual                        | The actual data (number/percentage) achieved during the reporting period   |
| Benchmark                     | A comparator used to compare the Council's performance against. The 2020/21 average for Unitary Councils in England has been used where available unless otherwise stated. |
| Numerator                     | Number as part of the percentage calculation which shows how many of the parts indicated by the denominator are taken. See example below.                                  |
| Denominator                   | The total number which the numerator is divided by in a percentage. See example below.   |
| EXAMPLE Performance Indicator | % Calls answered   |
| Numerator                     | Number of calls answered   |
| Denominator                   | Total number of calls received   |

| Place & Economy                  |         |   |                     |  |   |                        |                        |                         |                        |                        |                        |   |                  |                                    |                                   |  |
|----------------------------------|---------|---|---------------------|--|---|------------------------|------------------------|-------------------------|------------------------|------------------------|------------------------|---|------------------|------------------------------------|-----------------------------------|--|
| Key Commitment                   | Ref No. | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No)                 | Benchmark   | Quarter 1 23-24        | Quarter 2 23-24        | Year to Date 2023-24    | July 2023/24           | August 2023/24         | September 2023/24      | Direction of Travel (since previous period) | Polarity         | Target                             | Tolerance                         | Comments   |
| <b>Assets &amp; Environment</b>  |         |   |                     |  |   |                        |                        |                         |                        |                        |                        |   |                  |                                    |                                   |  |
| Modern Public Services           | MPS24   | Rate of return on investment portfolio (%)  |                     | No   | n/a   | 5.55%                  | 5.54%                  | 5.54%                   | n/a reported Quarterly | n/a reported Quarterly | 5.54%                  | ↓   | Higher is better | 5.41%                              | 4.91% - 5.41%                     | The Commercial stock continues to perform well. Occupancy rate has slowed in the smaller retail units but we are now starting to see some progress to the demand so should have a positive effect on this KPI  |
| Modern Public Services           | MPS25   | Total rental income from commercial estate (£)  |                     | No   | n/a   | £13,564,047.00         | £13,526,339.00         | £13,526,339.00          | n/a reported Quarterly | n/a reported Quarterly | £13,526,339.00         | ↓   | Higher is better | £13,000,918                        | £12,358,472.1 - £13,000,918 (-5%) | The commercial stock continues to be in demand as a whole although some of the tenants in smaller units are feeling the financial economic pressures. We have a mix of portfolio class which reduces the Council's exposure to one sector. We have forecast increased rental income over the MTFP and are looking to improve this further in the coming months with some potentially significant Rent Reviews currently being worked on. |
| Greener, Sustainable Environment | GSE09   | Volume of pesticides used within NNC grounds services operations  |                     | No   |   | 28L                    | 66L                    | 94L                     | n/a reported Quarterly | n/a reported Quarterly | 66L                    | ↑R  | Lower is better  | 250L (Annual)<br>62.5L (Quarterly) | 25%                               | This is the raw chemical usage, 0.25L/10L dilution rate.   |
| <b>Growth &amp; Regeneration</b> |         |   |                     |  |   |                        |                        |                         |                        |                        |                        |   |                  |                                    |                                   |  |
| Safe and thriving places         | STP15   | Percentage of major planning applications determined within 13 weeks (or within agreed extension of time)                                     |                     | Yes (we have set the target higher than statutory level) | 94% (Mean Average CIPFA Near Neighbours - LG Inform Q4 2022/23) | 92.31%                 | 82.35%                 | 86.67%                  | 75%                    | 75%                    | 100%                   | ↑G  | Higher is better | 90%                                | 85% - 90%                         | Performance this month has improved, but relatively low case numbers for major applications mean that performance remains volatile. Year-to-date performance is slightly below target but within tolerance. Since the number of applications is relatively low at this stage, individual case performance significantly impacts the overall results.   |
| Safe and thriving places         | STP16   | Percentage of minor planning applications determined within 8 weeks (or within agreed extension of time)                                      |                     | Yes (we have set the target higher than statutory level) | 97% (Mean Average CIPFA Near Neighbours - LG Inform Q4 2022/23) | 73.91%                 | 84.54%                 | 79.37%                  | 81.82%                 | 86.49%                 | 85.19%                 | ↓   | Higher is better | 85%                                | 80% - 85%                         | Performance this month is above target. Planning officer capacity remains challenging, but a forthcoming recruitment campaign is hoped to assist and result in improved longer-term performance.   |
| Safe and thriving places         | STP17   | Percentage of other (including householder applications) planning applications determined within 8 weeks (or within agreed extension of time) |                     | Yes (we have set the target higher than statutory level) | 88% (Mean Average CIPFA Near Neighbours - LG Inform Q4 2022/23) | 83.81%                 | 85.83%                 | 84.77%                  | 89.02%                 | 85.33%                 | 83.51%                 | ↓   | Higher is better | 88%                                | 83% - 88%                         | Performance has dropped this month, and is slightly below target, but within tolerance. Planning officer capacity remains challenging, with incoming officers focusing on minor applications.  |
| Safe and thriving places         | STP19   | Total number of planning applications received - ALL TYPES of applications  |                     | No   | Not relevant to benchmark.                                      | 490                    | 499                    | 989                     | n/a reported Quarterly | n/a reported Quarterly | 499                    | ↑   | No polarity      | Tracking                           | N/A                               |  |
| Safe and thriving places         | STP41   | % applications determined which were subject to an extension of time  |                     | No   |   | 37.6% (144 out of 383) | 37.5% (138 out of 368) | 37.55% (282 out of 751) | n/a reported Quarterly | n/a reported Quarterly | 37.5% (138 out of 368) | ↓   | No polarity      | Tracking                           | N/A                               |  |
| Safe and thriving places         | STP23   | Percentage of NNC County Matter (minerals and waste) planning decisions made within the required timescale                                    |                     | Yes  | 47% (Mean Average CIPFA Near Neighbours - LG Inform Q4 2022/23) | 100.00%                | 100.00%                | 100.00%                 | n/a reported Quarterly | n/a reported Quarterly | 100.00%                | →   | Higher is better | 95%                                | 5%                                | One application was due and was determined within timescale in this period.  |

| Place & Economy                           |                           |   |                           |   |  |   |                           |                           |                           |                           |                         |   |                  |  |                                       |  |       |
|---|---------------------------|---|---------------------------|---|--|---|---------------------------|---------------------------|---------------------------|---------------------------|-------------------------|---|------------------|--|---------------------------------------|--|-------|
| Key Commitment                            | Ref No.                   | Description of Performance Indicator  | Infographic / Chart       | Statutory Reporting Required? (Yes / No)          | Benchmark  | Quarter 1 23-24                           | Quarter 2 23-24           | Year to Date 2023-24      | July 2023/24              | August 2023/24            | September 2023/24       | Direction of Travel (since previous period) | Polarity         | Target   | Tolerance                             | Comments   |       |
| Safe and thriving places                  |                           | % of Full fibre coverage  |                           | No<br>(Nationally measured, so able to benchmark) | 55.3%<br>(Mean Average CIPFA Near Neighbours - LG Inform Q2 2023/24)<br><br>56.2% Q2 2023-24 (England) - Think Broadband | 69.3%                                     | 75.7%                     | 75.7%                     | n/a reported Quarterly    | n/a reported Quarterly    | 75.7%                   | ↑G  | Higher is better | 40% of Premises countywide (Dec 2023)<br>80% of Premises countywide (Dec 2023)           | <5% Green<br>5%-10% Amber<br>>10% Red | Strong performance countywide when compared to the average full fibre coverage for the same period in England (75.7% across Northamptonshire compared to 56.2% in England). The 40% full fibre countywide coverage target by December 2023 was achieved early (March 2023). Full fibre coverage in NN exceeded 40% in January 2023, ahead of target. Sights are now set on the countywide 80% target. Full fibre coverage in NN has seen a strong upward trajectory in the last quarter reaching 59.8% compared to 47.8% last quarter. With announced Openreach and CityFibre plans in NN and planned VirginMedia full fibre upgrades, as well as Gigaclear's build in the rural areas, we expect to see improved growth in full fibre coverage in the coming year. Year to date is latest position.                         |       |
| Safe and thriving places                  | STP22                     | % of gigabit coverage   |                           | No<br>(Nationally measured, so able to benchmark) | 82.9%<br>(Mean Average CIPFA Near Neighbours - LG Inform Q2 2023/24)<br><br>79.0% Q2 2023-24 (England) - Think Broadband | 88.3%                                     | 89.9%                     | 89.9%                     | n/a reported Quarterly    | n/a reported Quarterly    | 89.9%                   | ↑G  | Higher is better | 75% of premises gigabit capable (Dec 2023)<br>90% of premises gigabit capable (Dec 2023) | <5% Green<br>5%-10% Amber<br>>10% Red | Gigabit capable network coverage continues to steadily increase across Northamptonshire and is performing strongly in comparison to the average for England (89.9% locally compared to 79.0%). In the last quarter coverage has increased from 88.3% to 89.9%, a fraction away from our 90% target. Following the huge gains in gigabit coverage in 2021 when Virgin Media upgraded its network and we saw a leap from 24% to 72% gigabit coverage in a single month, progress has been a steady upward trajectory. Industry focus on full fibre is also driving the gigabit coverage figures as Openreach, Virgin Media, CityFibre and Gigaclear continue to deploy as well as smaller altnets like Swish and Voneus. Coverage in North Northants is also performing well and has reached 88.0% up from 85.3% last quarter. |       |
| Greener, sustainable environment          | GSE01                     | Number of E-Scooter trips   |                           | No  | n/a  | 131,281                                   | 140,797                   | 272,078                   | n/a reported Quarterly    | n/a reported Quarterly    | 140,797                 | ↑G  | Higher is better | Higher than corresponding point in previous year   | 10%                                   | E-scooter trips increased from Q1 23-24 to Q2 23-24. Year-on-year trend shows slightly decreased popularity with 2023 figures lower than for the same period in 2022. Year to date is cumulative position.   |       |
| Greener, sustainable environment          | GSE02                     | Number of E-Scooter users   |                           | No  | n/a  | 14,785                                    | 15,258                    | 30,043                    | n/a reported Quarterly    | n/a reported Quarterly    | 15,258                  | ↑G  | Higher is better | Higher than corresponding point in previous year   | 10%                                   | E-scooter users increased from Q1 23-24 to Q2 23-24. Year-on-year trend shows a slight decrease in popularity with 2023 user figures lower than for the same period in 2022. This may be due to costs of living and other external factors impacting on discretionary travel and spend. Peak trips continue to be below work. Year to date is cumulative position.   |       |
| Greener, sustainable environment          | GSE03                     | Co2 saving from E-Scooters (tonnes)   |                           | No  | n/a  | 23.4                                      | 25.6                      | 49.0                      | n/a reported Quarterly    | n/a reported Quarterly    | 25.6                    | ↑G  | Higher is better | Higher than corresponding point in previous year   | 10%                                   | CO2 savings increased from Q1 23-24 to Q2 23-24. Year-on-year trend shows a decrease in CO2 savings with figures lower than for the same period in 2022. Year to date is cumulative position.  |       |
| Greener, sustainable environment          | GSE04                     | Number of electric vehicles charging points publicly available                        | 139 as at end of June     | No  | N/A  | 128 (Q4 2022-23)                          | 139 as at end Q1 2023     | 139 as at end Q1 2023     | n/a reported Quarterly    | n/a reported Quarterly    | 139 as at end Q1 2023   | ↑G  | Higher is better | Increase in 10% by end of year. (2.5% by end of Q1)                                      | 2%                                    | Source: DT produced data (at end Q1 2023).   |       |
| Greener, sustainable environment          | GSE05                     | Number of electric vehicles per charge point per 100000 population (national ranking) | 38.6 as at end of June    | No<br>(Nationally measured, so able to benchmark) | 42<br>(Mean Average CIPFA Near Neighbours - LG Inform Q2 2023)   | 35.5 (Q4 2022-23)                         | 38.6 (Q1 2023-24)         | 38.6 (Q1 2023-24)         | n/a reported Quarterly    | n/a reported Quarterly    | 38.6 (Q1 2023-24)       | ↑G  | Lower is better  | Tracking (aim to decrease in numbers; improve ranking)                                   | N/A                                   | Ranking = 173 out of 309 local authorities (England). Source: DT produced data (at end Q1 2023).   |       |
| Greener, sustainable environment          | GSE08                     | Co2 saving from Delivery Robots (kg)  |                           | No  | n/a  | 1,116                                     | 626                       | 1,742                     | n/a reported Quarterly    | n/a reported Quarterly    | 626                     | ↓   | Higher is better | Tracking   | N/A                                   | CO2 savings from Delivery Robots have decreased slightly compared to Q1 2023/24. This is due to a change in the process for calculation.   |       |
| Highways & W&P                            |                           |   |                           |   |  |   |                           |                           |                           |                           |                         |   |                  |  |                                       |  |       |
| Safe and thriving places                  | STP29                     | Number of Defects Outstanding on the network (at end of period), split by category    |                           | No - Contractual                                  | n/a  | 4069                                      | 1982                      | 1982                      | 3533                      | 3114                      | 1982                    | ↓G  | Lower is better  | No target - tracking indicator only  | N/A                                   | The number of carriageway defects at the end of the month decreased significantly in September. The roads do not deteriorate as quickly during the summer which has allowed Kier to implement P4 repairs earlier.  |       |
|   |                           |   |                           |   |  | P1 (Target response time within 24 hours) | 0                         | 0                         | 0                         | 0                         | 0                       | →   |                  |  |                                       |  |       |
|   |                           |   |                           |   |  | P2 (Target response time within 7 days)   | 0                         | 2                         | 2                         | 13                        | 4                       | ↓G  |                  |  |                                       |  |       |
|   |                           |   |                           |   |  | P3 (Target response time within 28 days)  | 608                       | 91                        | 91                        | 398                       | 281                     | 91  |                  |  |                                       |  | ↓G    |
| Safe and thriving places                  | STP30                     | Number of Defects Repaired in the network in period, split by category                |                           | No - Contractual                                  | n/a  | 4953                                      | 3957                      | 8910                      | 1575                      | 1372                      | 1010                    | ↓R  | Higher is better | No target - tracking indicator only  | N/A                                   | The total number of carriageway defects repaired has decreased again this month. The number of P3 and P4 defects requiring repair has continued to fall. This reduction is expected due to fewer overall defects, enabling the contractor to speed up P4 repairs. More of the works identified as requiring a 26 week repair, will have been completed before pothole numbers increase again this winter.  |       |
|   |                           |   |                           |   |  | P1 (Target response time within 24 hours) | 6                         | 0                         | 6                         | 0                         | 0                       | →   |                  |  |                                       |  |       |
|   |                           |   |                           |   |  | P2 (Target response time within 7 days)   | 217                       | 202                       | 419                       | 54                        | 127                     | ↓R  |                  |  |                                       |  |       |
|   |                           |   |                           |   |  | P3 (Target response time within 28 days)  | 2863                      | 1410                      | 4273                      | 530                       | 518                     | 362   |                  |  |                                       |  | ↓R    |
| Safe and thriving places                  | STP31                     | Percentage of defects responded to within the timeframes specified, split by category |                           | No - Contractual                                  | n/a  | 86.81% (3737 out of 4305)                 | 97.28% (3178 out of 3267) | 91.32% (6915 out of 7572) | 97.15% (1090 out of 1122) | 96.78% (1291 out of 1334) | 98.27% (797 out of 811) | ↑G  | Higher is better | P1 and P2 97.5%<br>P3 and P4 90%   | No Tolerance                          | All targets have been met again this month.  |       |
|   |                           |   |                           |   |  | P1 (Target response time within 24 hours) | 100% (6 out of 6)         | 100% (0 out of 0)         | 100% (6 out of 6)         | N/A (0 out of 0)          | N/A (0 out of 0)        | 100% (0 out of 0)                           |                  | →  |                                       |  | 97.5% |
|   |                           |   |                           |   |  | P2 (Target response time within 7 days)   | 99.09% (217 out of 219)   | 100% (209 out of 209)     | 99.53% (426 out of 428)   | 100% (57 out of 57)       | 100% (128 out of 128)   | 100% (24 out of 24)                         |                  | →  |                                       |  | 97.5% |
|   |                           |   |                           |   |  | P3 (Target response time within 28 days)  | 86.72% (2293 out of 2644) | 95.53% (1132 out of 1185) | 89.45% (3425 out of 3829) | 95.91% (445 out of 464)   | 94.68% (427 out of 451) | 96.3% (260 out of 270)                      |                  | ↑G   |                                       |  | 90%   |
| P4 (Target response time within 26 weeks) | 85.03% (1221 out of 1436) | 98.08% (1837 out of 1873)   | 92.41% (3058 out of 3309) | 97.84% (588 out of 601)                           | 97.48% (736 out of 755)  | 99.23% (513 out of 517)                   | ↑G                        | 90%                       |                           |                           |                         |   |                  |  |                                       |  |       |

| Place & Economy            |         |   |   |   |  |                           |                 |                      |                           |                           |                   |   |                  |                    |              |   |
|----------------------------|---------|---|---|---|--|---------------------------|-----------------|----------------------|---------------------------|---------------------------|-------------------|---|------------------|--------------------|--------------|---|
| Key Commitment             | Ref No. | Description of Performance Indicator  | Infographic / Chart   | Statutory Reporting Required? (Yes / No)          | Benchmark  | Quarter 1 23-24           | Quarter 2 23-24 | Year to Date 2023-24 | July 2023/24              | August 2023/24            | September 2023/24 | Direction of Travel (since previous period) | Polarity         | Target             | Tolerance    | Comments  |
| <b>Regulatory Services</b> |         |   |   |   |  |                           |                 |                      |                           |                           |                   |   |                  |                    |              |   |
| Safe and thriving places   | STP34   | % of New encampments visited within 1 working day of notification; unless operational difficulties prevent this |  | No  | N/A  | N/A Half-Yearly frequency | 100%            | 100%                 | N/A Half-Yearly frequency | N/A Half-Yearly frequency | 100%              | →   | Higher is better | 95%                | 85% to 94.9% | All encampments were visited within 1 working day either directly by NTU staff or by a partner (e.g. Police)  |
| Safe and thriving places   | STP32   | % of food establishments in the area broadly compliant with food hygiene law                                    |  | No<br>(Nationally measured, so able to benchmark) | 97.49%<br>(CIPFA Near Neighbours - LG Inform)                                | 97.00%                    | 96.00%          | 96.00%               | 96.39%                    | 96.42%                    | 96.00%            | ↓   | Higher is better | 95%                | 90%-95%      | The number of broadly compliant businesses has increased slightly since Quarter 1, however there has been an increase in the total number of food businesses which has resulted in a 0.5% decrease in the broadly compliant premises overall. This is reflected as 1% due to rounding. Performance therefore remains relatively consistent and above target.  |
| Safe and thriving places   | STP33   | % of Local Land Charges searches processed within 10 working days   |  | No reporting required but a Statutory duty        | n/a  | 96.55%                    | 88.01%          | 92.20%               | 90.77%                    | 99.11%                    | 77.33%            | ↓R  | Higher is better | 95%                | 85.5% - 95%  | Performance in September dropped below the target performance for Local Land Charges. This is due to recent staff changes within our Kettering office and annual leave taken in September.  |
| Safe and thriving places   | STP35   | % of Rogue trading activities tackled (rogue traders subject to a Trading Standards intervention)               |  | No  | Trading standards institute is the national body - look for benchmarks there | 100%                      | 100%            | 100%                 | 100%                      | 100%                      | 100%              | →   | Higher is better | 100%               | N/A          | 1 x previously advised re lack of cancellation rights and intimidating behaviour, 1 x formal undertaking due to lack of consumer rights and misdescription of vehicle, 1 x previous history re Under age sales (UAS) of vapes, 1 x previous history re advice and complaints, 1 x non compliant vape and UAS Test Purchase (TP), 3 x UAS TP, 1 x alleged UAS and non compliant vapes seized, 1 x national company not providing allergen information, 1 x Cold calling- Previously advised, 1 x Welfare of animals in market- previously advised, 1 x Underage sales alcohol and vapes- previously advised, 1 x Underage sales of vapes- previously advised, 3 x Seizure of illegal vapes- previously advised, 1 x Food labelling and possession of illegal vapes- previously advised |
| Safe and thriving places   | STP13   | Number of Private Sector Disabled Facilities Grants (DFG) cases on waiting list                                 |  | No  | n/a  | 18                        | 45              | 63                   | 8                         | 13                        | 45                | ↑R  | Lower is better  | TBC                | N/A          | The number of DFGs on the waiting list has increased in the last two months due to summer annual leave and some disaggregation of staff, plus we have seen an increase of new DT recommendations coming in. This figure fluctuates as previously explained and the current number waiting is manageable   |
| Safe and thriving places   | STP14   | Number of Private Sector Disabled Facilities Grants completions   |  | No  | n/a  | 62                        | 72              | 134                  | 32                        | 22                        | 18                | ↓   | Higher is better | 168 (14 per month) | TBD          | Monthly target continues to be exceeded.  |



| Customer & Governance         |         |   |                     |  |           |                                    |   |                          |                          |                          |                                    |   |                 |                                     |              |   |
|-------------------------------|---------|---|---------------------|--|-----------|------------------------------------|---|--------------------------|--------------------------|--------------------------|------------------------------------|---|-----------------|-------------------------------------|--------------|---|
| Key Commitment                | Ref No. | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No) | Benchmark | Year to Date 2023-24               | Quarter 1 23-24   | Jul-23                   | Aug-23                   | Sep-23                   | Quarter 2 23-24                    | Direction of Travel (since previous period) | Polarity        | Target                              | Tolerance    | Comments  |
| <b>Information Governance</b> |         |   |                     |  |           |                                    |   |                          |                          |                          |                                    |   |                 |                                     |              |   |
| Modern Public Services        | MPS15   | Total number of data breaches<br><i>A personal data breach is a security incident that has affected the confidentiality, integrity or availability of personal data.</i><br><br>There are two types of breaches:<br>• A 'Non-reportable breach' has a low, or no impact on the rights and freedoms of individuals.<br>• A 'Reportable breach' has a significant impact on the rights and freedoms of individuals. These are required to be reported to the Information Commissioner's Office (ICO). |                     | No                                       | n/a       | 84                                 | 33  | 17                       | 18                       | 16                       | 51                                 | ↑R  | Lower is better | No target - tracking indicator only | N/A          | Whilst there has been an increase in the number of incidents reported to the Data Protection Team, there appears to be no specific reason for the increase, and these have been reported across a variety of service areas. Of those incidents, there have been no reportable breaches to the Information Commissioner's Office this quarter. |
|                               |         | a) Reportable breaches (ICO)<br><i>(This was MPS23 reported quarterly, now included monthly as part of this performance indicator)</i>  |                     | 1  | 1         | 0                                  | 0   | 0                        | 0                        | ↓G                       |                                    |   |                 |                                     |              |   |
|                               |         | b) Non-reportable breaches  |                     | 83                                       | 32        | 17                                 | 18  | 16                       | 51                       | ↑R                       |                                    |   |                 |                                     |              |   |
| Modern Public Services        | MPS16   | Number of complaints to Information Commissioners Office (ICO) (with respect to handling of Freedom of Information (FOI) requests following internal review).   |                     | No                                       | n/a       | 3                                  | 2   | n/a (reported quarterly) | n/a (reported quarterly) | n/a (reported quarterly) | 1                                  | ↓G  | Lower is better | Tracking                            | No tolerance | The ICO reported a complaint they have received regarding a request for information which we deemed to be outside of the appropriate fees limit. On 26/10/23 the ICO advised that No Further Action was being taken by them and the complaint was closed.   |
| Modern Public Services        | MPS17   | Number of complaints to Information Commissioners Office (ICO) upheld by ICO (with respect to handling of Freedom of Information (FOI) requests following internal review).   |                     | No                                       | n/a       | 2                                  | 2   | n/a (reported quarterly) | n/a (reported quarterly) | n/a (reported quarterly) | 0                                  | ↓G  | Lower is better | 0 per month                         | No variation |   |
| Modern Public Services        | MPS18   | Number of complaints to Information Commissioners Office (ICO) (with respect to handling of Data Protection (DP) individual Rights requests).   |                     | No                                       | n/a       | 2                                  | 0   | n/a (reported quarterly) | n/a (reported quarterly) | n/a (reported quarterly) | 2                                  | ↑R  | Lower is better | Tracking                            | No variation |   |
| Modern Public Services        | MPS19   | Number of complaints upheld by Information Commissioners Office (ICO) related to handling of Data Protection (DP) individual Rights requests  |                     | No                                       | n/a       | 1                                  | 0   | n/a (reported quarterly) | n/a (reported quarterly) | n/a (reported quarterly) | 1                                  | ↑R  | Lower is better | 0 per month                         | No variation | The complaint upheld by the ICO related to a SAR and other information rights request which was delivered in hard copy format to the Wellingborough Offices. The complaint was upheld as not responded to within statutory timeframes.  |
| Modern Public Services        | MPS20   | Number of direct disclosure requests (ADR - Access to a Deceased Person's) received   |                     | No                                       | n/a       | n/a (no longer possible to report) | 1 (pre 17.04.23 when new software came into use). Now all ADRs are included within the SARs figures | n/a (reported quarterly) | n/a (reported quarterly) | n/a (reported quarterly) | n/a (no longer possible to report) | N/A   | N/A             | N/A - Tracking                      | No variation | We will no longer be able to report ADRs as a separate KPI since installing our new software system - it does not identify ADRs as a separate case type and all of these requests will now be logged as SARs.   |
| Modern Public Services        | MPS22   | Number of external Information Commissioners Office (ICO) complaints relating data management of data/breaches  |                     | No                                       | n/a       | 0                                  | 0   | n/a (reported quarterly) | n/a (reported quarterly) | n/a (reported quarterly) | 0                                  | →   | Lower is better | N/A - Tracking                      | No variation |   |

| Customer & Governance    |         |   |                     |  |           |                      |                 |              |              |              |                 |   |                  |                                     |                                     |  |
|--------------------------|---------|---|---------------------|--|-----------|----------------------|-----------------|--------------|--------------|--------------|-----------------|---|------------------|-------------------------------------|-------------------------------------|--|
| Key Commitment           | Ref No. | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No) | Benchmark | Year to Date 2023-24 | Quarter 1 23-24 | Jul-23       | Aug-23       | Sep-23       | Quarter 2 23-24 | Direction of Travel (since previous period) | Polarity         | Target                              | Tolerance                           | Comments   |
| <b>Customer Services</b> |         |   |                     |  |           |                      |                 |              |              |              |                 |   |                  |                                     |                                     |  |
| Modern public services.  | MPS30   | Total number of Stage 1 complaints received by NNC (excluding children's services complaints)                 |                     | No                                       | n/a       | 1136                 | 651             | 178          | 138          | 169          | 484             | ↓G  | Lower is better  | No target - tracking indicator only | No target - tracking indicator only | The volume of complaints received has reduced in the last quarter, however there is no clear reason for this as the spread of complaints by service remains consistent with previous quarters.   |
| Modern public services.  | MPS32   | Total number of complaints escalated to stage 2   |                     | No                                       | n/a       | 43                   | 20              | 9            | 4            | 10           | 23              | ↑R  | Lower is better  | No target - tracking indicator only | No target - tracking indicator only | There has been a very small increase in complaints that customers have escalated to stage 2 in this quarter, compared to both the last quarter and the comparable period last year, indicating that customers generally are satisfied with how the Council has resolved matters raised at stage 1 level. |
| Modern public services.  | MPS31   | Total number of complaints received by NNC  |                     | No                                       | n/a       | 1179                 | 671             | 187          | 142          | 179          | 507             | ↓G  | Lower is better  | No target - tracking indicator only | No target - tracking indicator only | The volume of complaints received has reduced in the last quarter, however there is no clear reason for this as the spread of complaints by service remains consistent with previous quarters.   |
| Modern public services.  | MPS34   | % of complaints answered within the Service Level Agreement (20 Working days or agreed extension)             |                     | No                                       | TBD       | 68%                  | 74%             | 49%          | 70%          | 73%          | 62%             | ↓R  | Higher is better | 90%                                 | 81%-90%                             | Despite a dip in the speed of complaint answering in July, the response rate was significantly better in August and September, and staff are working to ensure that the response rate improves further.  |
| Modern public services.  | MPS35   | % of complaints upheld  |                     | No                                       | TBD       | 33%                  | 23%             | 43%          | 41%          | 59%          | 45%             | ↑R  | Lower is better  | 20%                                 | 20% - 22%                           | There has been an increase in upheld complaints, however services are learning from mistakes as well as demonstrating that customer satisfaction remains positive.   |
| Modern public services.  | MPS37   | Total number of notices received of complaints under investigation by Ombudsman                               |                     | No                                       | n/a       | 29                   | 13              | 7            | 5            | 4            | 16              | ↑R  | Lower is better  | No target - tracking indicator only | N/A                                 | Volumes still remain low when taking into account the overall number of complaints received.   |
| Modern public services.  | MPS39   | % of calls answered out of total calls received in customer services  |                     | No                                       | n/a       | 77.71%               | 76.91%          | 76.48%       | 80.95%       | 78.25%       | 78.53%          | ↑G  | Higher is better | 90%                                 | 81% - 90%                           | Slightly below target however with new telephone system, we will be able to use data to better identify peaks across service better and put things in place to increase performance  |
| Modern public services.  | MPS40   | % Calls answered within 60 seconds in customer services   |                     | No                                       | TBD       | 59.57%               | 61.56%          | 57.18%       | 60.02%       | 55.49%       | 57.58%          | ↓R  | Higher is better | 80%                                 | 72% - 80%                           | Slightly below target however with new telephone system, we will be able to better identify peaks across service better and put things in place to increase performance  |
| Modern public services.  | MPS41   | Number of customers helped by customer services   |                     | No                                       | n/a       | 296842               | 152373          | 49100        | 47362        | 48007        | 144469          | ↓   | N/A              | No target - tracking indicator only | N/A                                 | This data is for information only  |
| Modern public services.  | MPS42   | Number of customer interactions to customer services - split by telephone/face-to-face, email and online form |                     | No                                       | n/a       | 189759               | 94577           | 31770        | 32114        | 31298        | 95182           | ↓   | N/A              | No target - tracking indicator only | N/A                                 |  |
|                          |         |   |                     |  |           | Telephone            | Telephone       | Telephone    | Telephone    | Telephone    | Telephone       |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | Face to face         | Face to Face    | Face to Face | Face to Face | Face to Face | Face to Face    |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | 22122                | 10665           | 3971         | 3795         | 3691         | 11457           |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | E-Forms              | E-Forms         | E-Forms      | E-Forms      | E-Forms      | E-Forms         |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | 12519                | 7474            | 1254         | 1281         | 2510         | 5045            |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | Emails               | Emails          | Emails       | Emails       | Emails       | Emails          |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | 72442                | 39657           | 12105        | 10172        | 10508        | 32785           |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | Web Chat             | Web Chat        | Web Chat     | Web Chat     | Web Chat     | Web Chat        |   |                  |                                     |                                     |  |
|                          |         |   |                     |  |           | N/A                  | N/A             | N/A          | N/A          | N/A          | N/A             |   |                  |                                     |                                     |  |



| Communities & Public Health |         |  |  |  |           |                      |                                 |                 |   |                  |   |           |  |
|-----------------------------|---------|--|--|--|-----------|----------------------|---------------------------------|-----------------|---|------------------|---|-----------|--|
| Key Commitment              | Ref No. | Description of Performance Indicator   | Infographic / Chart  | Statutory Reporting Required? (Yes / No) | Benchmark | Year to Date 2023-24 | Quarter 1 23-24                 | Quarter 2 23-24 | Direction of Travel (since previous period) | Polarity         | Target  | Tolerance | Comments   |
| Communities and Libraries   |         |  |  |  |           |                      |                                 |                 |   |                  |   |           |  |
| Active, fulfilled lives     | AFL09   | Number of physical visits to libraries   |                 | No                                       | n/a       | 287,275              | 110,147                         | 131,138         | ↑G  | Higher is better | 499,791 annual target<br>Q1 target 21% (104,618)<br>Q2 target 26% (128,492)<br>Q3 target 26% (128,461)<br>Q4 target 28% (138,220) | 5%        | Visits are exceeding target by 21.5% for quarter 2. We are confident that this position will remain on or over the target.   |
| Safe and thriving places    | STP01   | Number of new business started with support from the BIPC (Business and Intellectual Property Advice) Northamptonshire |                 | No                                       | n/a       | 11                   | 2                               | 9               | ↑G  | Higher is better | 25 annual target<br>6.25 Quarterly  | 4%        | The new programme, the UKSPF (UK Shared Prosperity Fund) funded programme, launched in quarter 2 and numbers have seen a significant increase on quarter 1. We anticipate higher returns in quarters 3/4 to meet the target.   |
| Active, fulfilled lives     | AFL10   | Number of participants in the Summer Reading Challenge   | 4096 participants in summer reading challenge 2023   |  | n/a       | 4,096                | n/a (reported annually October) | 4,096           | ↑G  | Higher is better | 3,417   | 4%        | These figures represent the current status, and we are currently awaiting final confirmation that all the data is available. However early indications point to a successful summer.   |
| Safe and thriving places    | STP02   | Number of satisfactory Anti-Social Behaviour resolutions by North Northamptonshire Council                             |                 | No                                       | n/a       | 78.94%               | 91.66%                          | 57.14%          | ↓R  | Higher is better | 87%   | 5%        | Please note this number is only for Corby cases at present. The team is exploring ways to obtain information wider. Cases closed the previous month will be contacted the following month which affects the data for the quarter.  |
| Safe and thriving places    | STP03   | Number of repeat incidents of reported domestic abuse incidents  |                 | No                                       | n/a       | 200                  | 115                             | 85              | ↓G  | Lower is better  | 190   | 5%        | The reduction in numbers could be the result of Home Office changes to the way that behavioural crimes such as stalking, controlling and coercive behaviour, and harassment are recorded. They no longer need to be recorded separately, so if an individual victim was reporting several crimes only the most serious now need to be recorded. The Police reports are reviewed and updated which has resulted in Qrt1 total being adjusted. |
| Connected communities       | CNC02   | Total amount of funding released via small discretionary grants into organisations                                     | No discretionary funding released via small discretionary grants into organisations Apr-Sep 2023 |  | n/a       | 0                    | n/a Half Yearly frequency       | 0 (% N/A)       | →   | Higher is better | 100%  | 2%        |  |

| Finance Services       |         |   |                     |  |   |  |  |  |  |  |  |  |  |   |                  |                     |              |  |
|------------------------|---------|---|---------------------|--|---|--|--|--|--|--|--|--|--|---|------------------|---------------------|--------------|--|
| Key Commitment         | Ref No. | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No)                           | Benchmark   | Quarter 2 22-23  | Quarter 1  | Year to Date 2023/24   | Quarter 2 2023/24  | Direction of Travel (since previous period)          | Polarity   | Target   | Tolerance  | Comments  |                  |                     |              |  |
| Finance                |         |   |                     |  |   |  |  |  |  |  |  |  |  |   |                  |                     |              |  |
| Modern Public Services | MPS01   | % of invoices paid within 30 days   |                     | Yes  | n/a   | 97.1%  | 96.6%  | 98.7%  | 98.9%  | ↑G   | Higher is better   | 95%  | Tolerance: TBC   | This KPI continues to exceed target and has reported over 98% each month of the quarter.  |                  |                     |              |  |
|                        |         |   |                     |  |   | 9477 out of 9761   | 8573 out of 8699   | 18030 out of 18265   | 9457 out of 9566   |  |  |  |  |   |                  |                     |              |  |
| Modern Public Services | MPS02   | Estimated total value of contracts (over the contract term) awarded to local suppliers (post code starting 'NN') following a procurement process being ran equal to and above £100k |                     | No   | n/a   | 70%  | 96%  | 48%  | 0%   | ↓  | N/A  | No Target - Tracking Only                                    | No tolerance   | In quarter 2, there were seven (7) contracts awarded equal to or exceeding £100,000.<br>- "NNC - Geographic Information System (GIS)" - this contract was procured via a direct award from an external framework, and awarded to one (1) non-local supplier. The awarded contract value was £153,564.50.<br>- "NNC - New Air Conditioning Systems, Nene Valley Crematorium" - this contract was procured via a request for quotation, and awarded to one (1) non-local supplier. The awarded contract value was £116,372.00.<br>- "NNC - Security Information and Event Management (SIEM) Software Solution" - this contract was procured via a direct award from an external framework, and awarded to one (1) non-local supplier. The awarded contract value was £136,000.00.<br>- "NNC - External Legal Advice for Procurement of Treatment & Disposal of Residual Waste and Household Waste Recycling Centres" - this contract was procured via a mini-competition from an external framework, and awarded to one (1) non-local supplier. The awarded contract value was £105,162.50.<br>- "Call Off Under The Older Persons Residential And Nursing Homes Services Dynamic Purchasing System For The Provision Of A Discharge To Assess (DTA), Interim Care Home Service" - this contract was procured via a mini-competition from an internal framework and awarded to two (2) non-local suppliers. The awarded contract value was £152,000.00.<br>- "Provision of Independent Advocacy Services in North Northamptonshire" - this contract was procured via an open tender, and awarded to one (1) non-local supplier. The awarded contract value was £354,000.00.<br>- "Fuel Bankering for Fleet Services" - this contract was procured via a direct award from an external framework, and awarded to one (1) non-local supplier. The awarded contract value was £3,330,000.00. |                  |                     |              |  |
|                        |         |   |                     |  |   | £3,036,000 local spend of £4,318,227                         | Local spend of £3,512,750.00 from a total spend of £3,645,250.00 | Local spend of £3,512,750.00 from a total spend of £7,961,348.10 | Local spend of £0 from a total spend of £4,316,099.10            |  |  |  |  |   |                  |                     |              |  |
| Modern Public Services | MPS03   | % count of local suppliers (post code starting 'NN') awarded a contract following a procurement process being ran equal to and above £100k  |                     | No   | n/a   | 33%  | 50%  | 25%  | 0%   | ↓  | N/A  | No Target - Tracking Only                                    | No tolerance   | In quarter 2, there were seven (7) contracts awarded equal to or above £100,000. One contract was awarded to multiple suppliers (2) and all eight (8) suppliers were non-local.   |                  |                     |              |  |
|                        |         |   |                     |  |   | 2 local out of 6 total suppliers from 6 contracts            | 1 local supplier out of a total of 2 suppliers from 2 contracts  | 1 local supplier out of a total of 10 suppliers from 9 contracts | 0 local suppliers out of a total of 8 suppliers from 7 contracts |  |  |  |  |   |                  |                     |              |  |
| Key Commitment         | Ref No. | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No)                           | Benchmark   | September 2022/23  | Quarter 2 22-23  | Quarter 1 23-24  | Quarter 2 23-24  | Year to Date 2023/24                                 | July 2023/24   | August 2023/24   | September 2023/24  | Direction of Travel (since previous period)   | Polarity         | Target              | Tolerance    | Comments   |
| Revenues & Benefits    |         |   |                     |  |   |  |  |  |  |  |  |  |  |   |                  |                     |              |  |
| Modern Public Services | MPS05   | % of council tax collected in the year debit raised   |                     | Yes, reported on a quarterly basis but no target set by government | 96.97% (Mean Average CIPFA Near Neighbours - LG Inform 2022/23) | 57.69% (YTD) 103.52% achieved of the monthly target (56.00%) | 57.69% (YTD) 103.52% achieved of the monthly target (56.00%)     | 29.39% (YTD) 104.96% achieved of the target (28.00%)             | 56.98% (YTD) 101.75% achieved of the target (56.00%)             | 56.98% (YTD) 101.75% achieved of the target (56.00%) | 38.60% (YTD) 101.50% achieved of the monthly target (38.00%) | 47.82% (YTD) 101.74% achieved of the monthly target (47.00%) | 56.98% (YTD) 101.75% achieved of the monthly target (56.00%) | ↑G  | Higher is better | 98% (Annual target) | No tolerance | Performance is above target, however it is slightly below compared to the same point in time last year. This is likely to be due to the cost of living crisis and we will continue to monitor the situation closely. |
|                        |         |   |                     |  |   | £20,877,879.80 (collected in Sep)                            | £64,845,002.55 (collected in Q2)                                 | £71,233,844.18 (collected YTD)                                   | £77,038,877.69 (collected in Q2)                                 | £139,272,791.84 (collected YTD)                      | £22,340,264.84 (collected in July)                           | £22,433,944.51 (collected in Aug)                            | £22,264,698.31 (collected in Sep)                            |   |                  |                     |              |  |
| Modern Public Services | MPS04   | % of business rates collected in the year debit raised  |                     | Yes, reported on a quarterly basis but no target set by government | 97.13% (Mean Average CIPFA Near Neighbours - LG Inform 2022/23) | 56.80% (YTD) 101.43% achieved of the monthly target (56.00%) | 56.80% (YTD) 101.43% achieved of the monthly target (56.00%)     | 28.92% (YTD) 103.29% achieved of the target (28.00%)             | 55.72% (YTD) 99.50% achieved of the target (56.00%)              | 55.72% (YTD) 99.50% achieved of the target (56.00%)  | 38.79% (YTD) 102.09% achieved of the monthly target (38.00%) | 47.38% (YTD) 100.85% achieved of the monthly target (47.00%) | 55.72% (YTD) 99.50% achieved of the monthly target (56.00%)  | ↓   | Higher is better | 98% (Annual target) | No tolerance | Performance has dropped slightly below target, in the light of the cost of living issues and current economic climate. We will monitor this closely.   |
|                        |         |   |                     |  |   | £14,121,077.36 (collected in Sep)                            | £40,434,451.64 (collected in Q2)                                 | £77,367,457.48 (collected YTD)                                   | £47,700,607.20 (collected in Q2)                                 | £99,697,044.68 (collected YTD)                       | £17,203,547.42 (collected in July)                           | £18,601,058.19 (collected in Aug)                            | £13,194,470.69 (collected in Sep)                            |   |                  |                     |              |  |

| Children's Services   |                |   |                     |  |   |                   |                   |                      |                        |                        |                   |   |                  |        |           |  |
|---|----------------|---|---------------------|--|---|-------------------|-------------------|----------------------|------------------------|------------------------|-------------------|---|------------------|--------|-----------|--|
| Key Commitment  | Ref No.        | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No)                         | Benchmark   | Quarter 1 2023-24 | Quarter 2 2023-24 | Year to Date 2023-24 | July 2023/24           | August 2023/24         | September 2023/24 | Direction of Travel (since previous period) | Polarity         | Target | Tolerance | Comments   |
| Children's Trust (This data is for the whole of Northamptonshire) |                |   |                     |  |   |                   |                   |                      |                        |                        |                   |   |                  |        |           |  |
| Better, brighter futures  | BBF05 (KPI 2)  | % of referrals with a previous referral within 12 months  |                     | Yes (also contractual) - target is contractual but not statutory | 21.9% Mean for Northamptonshire Children's Services LAIT near neighbours 2021/22    | 25.4% (2,583)     | 26.4% (1,964)     | 25.8% (4,547)        | 23.2% (724)            | 31.0% (616)            | 25.5% (624)       | ↑G  | Lower is better  | 29%    | 25% - 40% | Re-referrals have improved this month better than target. It remains an area of ongoing focus with audit and review for learning. The front door review and subsequent action plan which will be developed with the partnership in October will reduce re-referrals going forward.<br>The dedicated education roles in MASH (Multi-Agency Safeguarding Hub) are working positively with schools to ensure appropriate referrals and compliance from schools about their roles and responsibilities. Work with all partners continues to ensure appropriate and robust application of thresholds.<br>Steps have been taken to strengthen the Early Help partnerships with Partnership Support Team (Early Help MASH) being placed in the MASH pods and a leaner step down process. It is anticipated that the strengthened model in MASH and developments in Child & Family Support Services (CFSS) Early Help will continue to support appropriate reduction going forward in addition to the recommendations from external MASH review.<br>COVID: and cost of living crisis has an impact on volume and quality of re-referrals (Trust commentary).   |
| Better, brighter futures  | BBF06 (KPI 3)  | % of single assessments authorised within 45 working days   |                     | Yes (also contractual) - target is contractual but not statutory | 88% We are in the process of identifying more up to date benchmark data for this PI | 92.9% (2,792)     | 94.3% (2,695)     | 93.6% (5,487)        | 95.3% (1,032)          | 92.2% (1,033)          | 96.3% (630)       | ↑G  | Higher is better | 85%    | 85% - 95% | Assessment timescales remain consistently above target and national average, increasing to 96.3% this month. All managers monitor this very closely via daily reports. A narrative is provided for cases that go beyond 45 days and this remains a very small minority. Whilst staffing has presented challenges due to vacancies and staff performance issues in Duty & Assessment Team (DAAT), there is now a positive move towards more appropriate staffing levels being achieved and sustained.<br>In addition to timeliness, we work on increasing the quality of assessments and more effective use of Signs of Safety (SoS) in our interventions (Trust commentary).   |
| Better, brighter futures  | BBF07 (KPI 8)  | % Children in care with three or more placements in the previous 12 months  |                     | Yes (also contractual) - target is contractual but not statutory | 10% Mean for Northamptonshire Children's Services LAIT near neighbours 2021/22      | 11.1% (1,191)     | 12.4% (1,165)     | 12.4% (1,165)        | 11.3% (1,191)          | 12.1% (1,179)          | 12.4% (1,165)     | ↓A  | Lower is better  | 10%    | 5% - 15%  | Performance has declined to 12.4% this month. Consideration of various options to improve sufficiency is continuing, including exploration of capital investment, additional in house resources, as well as improved engagement with the market. Two new emergency homes now operational and valuing care project has started having a positive impact on practice and outcomes for children.<br>Through improved edge of care arrangements, the close oversight on admissions to care, and the developments within placement sufficiency, we are confident we can reduce the need for child to move home as frequently. Positively, Childrens Home Capital Programme application with the Department for Education (DfE) has been successful, and that should also support progress in this area.<br>COVID: Placement sufficiency remains a challenge, sustained performance in this work should also have a positive impact on KPI 7 (Trust commentary).   |
| Better, brighter futures  | BBF08 (KPI 9)  | % of young people now aged 17-21 and in employment, education or training who were looked after when aged 16          |                     | Yes (also contractual) - target is contractual but not statutory | 56.95% Mean for Northamptonshire Children's Services LAIT near Neighbours 2021/22   | 62.7% (684)       | 65.3% (678)       | 65.3% (678)          | 62.9% (685)            | 63.3% (689)            | 65.3% (678)       | ↑G  | Higher is better | 55%    | 50% - 60% | This month has seen performance increase to 65.3%, comparing favourably with 58% across England. Focus in this area continues to be driven through arrangements with local colleges, the virtual school and the senior personal advisor (Education and Employment) with further review of contracted arrangements (Prospects) to be undertaken to ensure we have the best approach/ support for young people. Work with councils to ensure Education, Employment & Training (EET) opportunities and support is in place for our care leavers.<br>COVID: has had a significant impact on the mental health and wellbeing of care leavers, targeted work support care leavers to access EET (Trust commentary).  |
| Better, brighter futures  | BBF09 (KPI 10) | % of young people now aged 17-21 and living in suitable accommodation who were looked after when aged 16              |                     | Yes (also contractual) - target is contractual but not statutory | 89% [All English Authorities 2020/21 - LG Inform]                                   | 95.5% (684)       | 96.0% (678)       | 96.0% (678)          | 94.7% (684)            | 93.3% (689)            | 96.0% (678)       | ↑G  | Higher is better | 90%    | 85% - 95% | Performance for this month increased to 96.0%, still above the target of 90%. We know that we have some young people in unsuitable accommodation, including a number of young people sentenced to custody, and some who have no accommodation at all. We work hard to address this, iteratively seeking to engage with young people who may see our attempts at support as interference.<br>The care leavers housing protocol is in place and work is being progressed under the governance of a strategic group; this includes a review of the housing panels and engagement with the housing associations. Helpful discussions with colleagues in the Councils is placing the housing sufficiency needs of care leavers as central to their housing strategies. The Accommodation Transitions Panel is now in operation and ensures all young people have a comprehensive, accommodation-focused, shared, and timely transition plan (Trust commentary).   |
| Better, brighter futures  | BBF19 (KPI 11) | % of children in care who were placed for adoption within 12 months of an agency decision that they should be adopted |                     | Yes (also contractual) - target is contractual but not statutory | n/a   | 85.7% (7)         | 83.3% (6)         | 84.6% (13)           | n/a Quarterly reported | n/a Quarterly reported | 83.3% (6)         | ↓A  | Higher is better | 72%    | 57% - 77% | Strengthened family finding and matching processes have been implemented which alongside improved permanency tracking arrangements have supported timely decision-making process and ability to progress adoption placements. The use of foster to adopt placements have also positively influenced this performance indicator.<br>COVID: it has taken longer for courts to hold final hearings which could have a longer term impact on this target (Trust commentary).   |
| Better, brighter futures  | BBF27 (KPI 5)  | % of initial child protection conferences held within 15 days of a strategy discussion being initiated                |                     | Yes (also contractual) - target is contractual but not statutory | 84.3% Mean for Northamptonshire Children's Services LAIT near neighbours 2021/22    | 36.4% (343)       | 12.2% (287)       | 25.4% (630)          | 21.8% (87)             | 5.4% (130)             | 12.9% (70)        | ↑G  | Higher is better | 81%    | 66% - 86% | Performance improved slightly this month, but is well below expectations. 83% Initial Child Protection Conferences (ICPC) conversion to Child Protection (CP) Plans is positive. Summer data was negatively impacted by high numbers of 1st reviews scheduled after high numbers of ICPCs in April; this impacted on CP Chair availability. In-month, for ICPCs, all new Child Protection Conferences (CPC) had to fit in already busy diaries. CP Chair average caseload remains above 100 (well above recommended levels). Additional temporary CP Chair resource has been recruited, and this will have a positive impact (October). Average no. days from strategy discussion to ICPC in September = 28. There was another high number of ICPCs in August, but this reduced in September.<br>ICPCs are tracked and referring managers are challenged to identify causes of delay and ensure individual, team or whole-service learning is addressed. Staff changes continue to impact on performance combined with high levels of ICPC and reviews.<br>DAAT managers support Social Worker's with additional training on process, recording and requesting strategy discussions and convening conferences. A refreshed duty CP Chair flowchart is in place to assist referring managers with threshold decision-making and this has been shared with all teams (Trust commentary). |
| Better, brighter futures  | BBF28          | Number of children with a Child Protection Plan   |                     | Yes  | 665 Mean for Northamptonshire Children's Services LAIT near neighbours 2021/22      | 714               | 755               | 755                  | 702                    | 771                    | 755               | ↓   | No polarity      | TBD    |           | At the end of September 2023, 755 children were subject to a Child Protection Plan (CPP), 16 children less than the previous month. Yet, 676 children had a Child Protection Plan in September 2022. Prior to May 2023, there were less than 700 children were in the cohort between. However, an average of 736 children had a Child Protection Plan in the last four months. There are 79 children more in the CPPs cohort than one year ago and 119 more children than two years ago. An average of 693 children were subject to a Child Protection Plan in the last twelve months. By comparison, an average of 615 children had a Child Protection Plan during the same period of last year.<br>88.5% of children on Child Protection Plan had up to date CP visits in September 2023, an improvement (+6.8 percentage points) compared with the previous month. The proportion of children on plan with up-to-date CP visits is prone to fluctuations; the last twelve months, an average of 86.5% of children on CP plans has up-to-date CP visits. A similar outcome was achieved during the same period of last year (88.4%) and two years ago (88.6%) (Intelligent Client Function commentary).  |
| Better, brighter futures  | BBF29          | Number of children in care  |                     | Yes  | 1,050 Mean for Northamptonshire Children's Services LAIT near neighbours 2021/22    | 1,191             | 1,179             | 1,165                | 1,191                  | 1,179                  | 1,165             | ↓   | No polarity      | TBD    |           | 1,165 children were in care at the end of September 2023, 14 children less than last month. The number of children in care has decreased in the last six months. In the last twelve months, the lowest number of children in care was reported between June 2023-September 2023.<br>September 2023 marks the fourth consecutive month where less than 1,200 children have been recorded in this cohort. Prior to July 2022, the cohort had never exceeded 1,200. So far in 2023-24, an average of 1,191 children have been reported to be in care.<br>An average of 1,211 children have been reported to be in care in the last 12 months, a slightly higher outturn compared with the average during the same period of last year (1,188) and two years ago (1,151).<br>At the end of September 2023, 120 children in care were also identified in the Education Health Care (EHC) cohort. The number of children in care who were also identified in the EHC cohort has decreased by 2 since May 2023 (Intelligent Client Function commentary).  |

| Children's Services                     |         |   |                     |  |   |                   |                                   |                      |                        |                        |                                   |   |                  |                     |           |  |
|---|---------|---|---------------------|--|---|-------------------|-----------------------------------|----------------------|------------------------|------------------------|-----------------------------------|---|------------------|---------------------|-----------|--|
| Key Commitment                          | Ref No. | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No)   | Benchmark   | Quarter 1 2023-24 | Quarter 2 2023-24                 | Year to Date 2023-24 | July 2023/24           | August 2023/24         | September 2023/24                 | Direction of Travel (since previous period) | Polarity         | Target              | Tolerance | Comments   |
| <b>Learning, Skills &amp; Education</b> |         |   |                     |  |   |                   |                                   |                      |                        |                        |                                   |   |                  |                     |           |  |
| Better, brighter futures                | BBF18b  | % of EHC (education health care) plans completed in month issued within 20 weeks (including exceptions)   |                     | Yes<br>(part of SEN 2 return)  | 37.8% Mean for NNC Children's Services LAIT near neighbours 2021/22 | 66.7%             | 80.6%                             | 74.5%                | 74.1%                  | 87.7%                  | 78.2%                             | ↓R  | Higher is better | Target under review | n/a       | The summer has allowed the team to focus on writing and finalising plans. Again, this is the impact of the new assessment team which has been piloted as part of the new Educational Health Care (EHC) Team reorganisation. Whilst the team have written and finalised plans, many are finalised on type due to late lead professional advice not allowing the EHC Team time to consult. Requesting Statutory Assessment (RSA) decisions are being made by week 6 (no decisions have been made after 6 weeks). Advice is requested but often not returned until Week 16-17 of the process leaving the EHC team a few days to write the plan and 15 days for the draft to be commented on by the parent. To meet the statutory 20 week timescales, there is no time to send consults for pupils and staff have to amend plans naming a school once they are finalised. The EHC Team are working collaboratively with the Educational Psychology (EP) service and health to try to improve this (Service commentary).  |
|   |         |   |                     |  |   | 96 out of 144     | 150 out of 186                    | 246 out of 330       | 43 out of 58           | 64 out of 73           | 43 out of 55                      |   |                  |                     |           |  |
| Better, brighter futures                | BBF22   | Number of children missing education (previously named 'Number of children without a school place')   |                     | No   |   | 274               | 313                               | 313                  | 291                    | 316                    | 313                               | ↓G  | Lower is better  | Target under review | n/a       | This includes those children missing from education across School Admissions, Special Educational Needs Support/Education Health Care Services and EIP Services. 313 children were missing education at the end of September 2023. 3 children less than last month. This month marks the second highest volume reported in the five months for which figures are available. 45.7% of children missing education are in School Admissions, 37.1% are in Special Educational Needs (SEN) Support/ Education Health Care (EHC) Services and 17.3% are in Educational, Inclusion & Partnership (EIP) Services. The proportion of the total children missing education has risen by 37% in the last five months. August 2023 accounts for the highest proportion of children missing education. While the lowest proportion of children missing education was recorded in May 2023. In the last five months, an average of 278 children were missing education (Children's Performance Team commentary).  |
| Better, brighter futures                | BBF32   | Current number of home educated children  |                     | Not yet statutory but reported as part of "Elective Home Education/ Children missing in education" data return to DIE. |   | 855               | 837                               | 837                  | 783                    | 790                    | 837                               | ↑   | No polarity      | N/A - Tracking      | n/a       | 837 children were electively home educated in September 2023. Following a short period of decrease in Summer Term 2023, the number of electively home educated children has increased over 800. There now 47 children more than last month. There were 664 electively home educated children in September 2022, so the cohort is 20% greater than it was one year ago. The highest number of electively home educated children in the last twelve months was registered in May 2023, when 876 children were home educated. 33% of electively home educated children have been educated at home for more than two years (280 children), 18% for 1-2 years (148 children), 22% for 6-12 months (188 children), 11% for 3-6 months (95 children) and 15% for 0-3 months (126 children) (Children's Performance Team commentary).  |
| Better, brighter futures                | BBF33   | Number of children who are absent from education for prolonged periods (Previously named 'Number of children currently missing from education (Year 1-11)') |                     | Not yet statutory but reported as part of "Elective Home Education/ Children missing in education" data return to DIE. |   | 103               | 225                               | 225                  | 165                    | 133                    | 225                               | ↑R  | Lower is better  | N/A - Tracking      | n/a       | 225 children were absent from education for prolonged periods. Following the summer holidays, the population of children absent from education has significantly increased. A similar trend was observed at the beginning of the academic year 2022-23 when 254 children were absent from education for prolonged periods. 81.8% of children have been absent between 0-3 months (184), 12.4% of children have been absent between 3-6 months (28), 2.2% of children have been absent between 6-12 months (5), 3.6% of children have been absent between 1-2 years (8). There are now 11% fewer children absent from education than there were at the beginning of the academic year 2022-23. An average of 150 children were absent from education for prolonged periods in the last twelve months (Children's Performance Team commentary).  |
| Better, brighter futures                | BBF36   | % Education Health Care Plan Annual Reviews completed within 4 weeks of meeting   |                     | Statutory Duty but not reported  |   | 67.2%             | N/A reported one month in arrears | 66.2%                | 64.2%                  | 0.0%                   | N/A reported one month in arrears | ↓R  | Higher is better | N/A - Tracking      | n/a       | A new Annual Review (AR) template has been designed and training organised for all settings (Early Years (EY), primary, secondary, college, Out of Authority (COA), independent, special) for the 28th September. The team feel that updated training is needed to all settings to improve the standard of annual reviews being returned to the team. Clear expectations and a consistent approach will be shared – this should make the amendments completed by the EHC team much more streamlined. The weekly data dashboard illustrates the returned annual reviews and we can see the types of settings where annual reviews are not being completed – again with the new team organisation, we will be able to contact settings and challenge this. The caseworkers have been allocated a group of settings and have issued a spreadsheet of the AR's due date for 2023-24 academic year and highlighted if previous AR's are out of time. The annual review team manager has developed a system for monitoring these moving forward. The annual review team leader will complete the weekly data dashboard and capture any issues arising – these will be discussed at the weekly leadership team meeting. This system will enable the team to give a % for each setting of the return AR data which again will enable to learn to challenge and ensure that AR's are taking place consistently in all settings (Service commentary). The 0% result for August is due to the fact that Education Health Care Plan reviews are not carried out during August when schools are closed. |
|   |         |   |                     |  |   | 507 out of 754    |                                   | 661 out of 998       | 154 out of 240         | 0 out of 4             |                                   |   |                  |                     |           |  |
| Better, brighter futures                | BBF30   | Percentage of Early Years PVI Settings (non-domestic) judged as Good or Outstanding by Ofsted/ISI   |                     | No   |   | 99.0%             | 98%                               | 98%                  | n/a reported Quarterly | n/a reported Quarterly | 98%                               | ↓   | Higher is better | N/A - Tracking      | n/a       | 98.0% of Early Years PVI settings excluding domestic were rated as Good or Outstanding by OFSTED at the end of the September, actually the lowest proportion since November 2022 (91.6%). Perfect performance of 100% was achieved between December 2022 and February 2023. Prior to December 2022, performance was less stable. May 2022 saw 70.8% of settings excluding domestic were rated as Good or Outstanding. The subsequent seven months produced a period of instability but with performance usually under 95%. Since then performance of at least 98% has been achieved (Children's Performance Team commentary).  |
| Better, brighter futures                | BBF31   | Percentage of Early Years PVI Settings Childminders judged as Good or Outstanding by Ofsted   |                     | No   |   | 100.0%            | 99%                               | 99%                  | n/a reported Quarterly | n/a reported Quarterly | 99%                               | ↓   | Higher is better | N/A - Tracking      | n/a       | After five months in which 100% of PVI (Private, Voluntary or Independent) childminder settings were rated as Good or Outstanding by OFSTED, performance declined fractionally to 99.4% at the end of September. Even so, it was the tenth successive month with at least 99% of PVI childminder settings holding either of the top two OFSTED ratings. Prior to December 2022, performance was less impressive. Only once in seven months were more than 86% of PVI childminder settings rated as Good or Outstanding by OFSTED, with a low of 70.4% reported in May 2022 (Children's Performance Team commentary).   |

| Adults & Housing        |         |   |                     |  |  |                 |                                    |                      |              |                |                                    |   |                  |  |                                   |   |
|-------------------------|---------|---|---------------------|--|--|-----------------|------------------------------------|----------------------|--------------|----------------|------------------------------------|---|------------------|--|-----------------------------------|---|
| Key Commitment          | Ref No. | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No)   | Benchmark  | Quarter 1 23-24 | Quarter 2 23-24                    | Year to Date 2023-24 | July 2023/24 | August 2023/24 | September 2023/24                  | Direction of Travel (since previous period) | Polarity         | Target                                     | Tolerance                         | Comments  |
| Adult Social Care       |         |   |                     |  |  |                 |                                    |                      |              |                |                                    |   |                  |  |                                   |   |
| Active, fulfilled lives | AFL03   | Percentage of New Requests for Services (all ages) where Route of Access was Discharge from Hospital, that had a sequel of short term services to maximise independence (ST-MAX i.e. reablement)                                  |                     | No<br>The source data is from the SALT (Statutory) return. There are no gov targets. This indicator is included in our regional benchmarking.  | 2021/22 SALT Report: - England: 37%  | 38%             | 40%                                | 40%                  | 38%          | 39%            | 40%                                | ↑G  | Higher is better | 35%  | 5% points                         | BI comments: There were 31 new requests for people aged 18-64 and 438 for people aged 65 and over. There is positive growth year to date, with the rate higher than those reported throughout 2022/23 and above year-end target.<br>Service Manager Comments: Demand on all pathways is exceeding Capacity modelling for Better Care Fund (BCF).  |
| Active, fulfilled lives | AFL04   | Number of new safeguarding concerns received per month  |                     | Yes<br>(Annually in the SAC (Safeguarding Adults Collection) return)   | n/a - there are differences in what authorities record as a 'concern'  | 1119            | N/A Reporting one month in arrears | 1852 (Apr-Aug)       | 365          | 361            | N/A Reporting one month in arrears | ↓   | No polarity      | No target - tracking indicator only        | N/A                               | BI comments: The number of new concerns received remained stable from the previous period and remains notably higher than the average seen over the previous financial year (318).  |
| Active, fulfilled lives | AFL05   | New safeguarding concerns determined to be enquiries (both 442 and other) (A 542 enquiry must take place if there is reason to believe that abuse or neglect is taking place)   |                     | Yes<br>(Annually in the SAC (Safeguarding Adults Collection) return)   | n/a  | 162             | N/A Reporting one month in arrears | 293 (Apr-Aug)        | 61           | 70             | N/A Reporting one month in arrears | ↑   | No polarity      | No target - tracking indicator only        | N/A                               | BI comments: There was a notable increase in the proportion of concerns determined to be enquiries (+9). The proportion seen (19%) still remains slightly below the average seen over the previous financial year (22%).  |
| Active, fulfilled lives | AFL06   | Total number of open Deprivation of liberty Safeguard (DoLS) cases  |                     | Yes<br>(Annually)  | n/a  | 1267            | 1305                               | 1305                 | 1292         | 1286           | 1305                               | ↑   | Lower is better  | No target - tracking indicator only        | N/A                               | BI comments: The number of open Deprivation of liberty Safeguard (DoLS) cases increased slightly (+19). This still remains notably lower than the average observed across the previous financial year (330 fewer).  |
| Active, fulfilled lives | AFL07   | Long-term support needs met by admission to residential and nursing care homes, per 100,000 population (older people 65 years +)  |                     | No<br>The source data is from the SALT (Statutory) return. There are no gov targets. This indicator is included in ASCOF, (Adult Social Care Outcomes Framework) regional benchmarking and BCF (Better Care Fund) returns. | 546.17 (Mean Average CIPFA Near Neighbours - LG Inform)<br>2021/22 SALT Report: - East Midlands: 562 - England: 539  | 135.6           | 263.7                              | 263.7                | 169.2        | 221            | 263.7                              | ↓G (cumulative)                             | Lower is better  | Year-end target: 564<br>Monthly target: 47 | TBD - for now applied standard 5% | BI comments: This is a cumulative measure which increases throughout the financial year; resetting each April.<br>A year-end data review was carried out and found some potential issues with reported admissions. The Business Intelligence team have supported Adult Social Care teams to correct admission data and have implemented change to sourcing data to more accurately reflect actual admissions.<br>The year to date admissions are 173; 131 admissions following an assessment for new people, 4 following an episode of reablement for new people, 2 following an episode of reablement for existing people, and 36 as a result of change in setting following a review.<br>Average monthly growth is 46.1 |
| Active, fulfilled lives | AFL08   | Number of people who were prevented from requiring statutory care, or whose need was reduced (Delaying and reducing the need for care and support having received short term services to maximise independence (ST-MAX) services) |                     | No<br>The source data is from the SALT (Statutory) return. There are no gov targets. This indicator is included in ASCOF and regional benchmarking.  | 84.6% East Midlands Average, we are in the process of identifying more up to date benchmark data for this PI.<br>This is an 'Office for Local Government' OFLOG Metric | 71.40%          | 73.0%                              | 73.0%                | 72.1%        | 74.4%          | 73.0%                              | ↓   | Higher is better | 80%  | 5% points                         | BI comments: The rate shows positive growth from April to August but saw a slight reduction in September. The rate remains lower than expected compared to 2022/23 trends, which typically ranged between 74-77%.<br>There is a higher proportion of people accessing reablement support as a result of hospital discharge when compared to the same period previous year, along with higher proportions of these requiring long term support following their reablement episode, contributing to lower than expected performance.  |

| Adults & Housing        |         |  |   |   |  |                 |                 |                      |                        |                        |                   |   |                  |   |                                   |  |
|-------------------------|---------|--|---|---|--|-----------------|-----------------|----------------------|------------------------|------------------------|-------------------|---|------------------|---|-----------------------------------|--|
| Key Commitment          | Ref No. | Description of Performance Indicator   | Infographic / Chart   | Statutory Reporting Required? (Yes / No)  | Benchmark  | Quarter 1 23-24 | Quarter 2 23-24 | Year to Date 2023-24 | July 2023/24           | August 2023/24         | September 2023/24 | Direction of Travel (since previous period) | Polarity         | Target                                      | Tolerance                         | Comments   |
| Active, fulfilled lives | AFL12   | Number of rough sleepers - single night snapshot                                       |    | Yes<br>(DLUHC monthly rough sleeping survey, and target agreed with our RSI adviser from DLUHC) | 7<br>(Mean Average CIPFA Near Neighbours - LG Inform)  | 16              | 13              | n/a                  | 13                     | 12                     | 13                | ↑R  | Lower is better  | 9   | 9 to 12                           | During the month of September, there has been a steady flow of rough sleepers (13 single night), with a high proportion of new Rough Sleepers. The single night data was taken from the last outreach session in September so the team are working with this new cohort to establish the cause and support needs. The team are focusing on prevention work as much as possible, linking in with our cohort that have been placed and liaising with the providers if there are concerns around failures. Our long-term rough sleepers, (which is measured if seen 3 or more months of last 12 months) remains fairly high at 9 for the month which although is a reduction from last month as we have placed some within our Rough Sleeper accommodation Programme (RSAP) units. The RSAP project is aimed at our Multiple exclusion homelessness cohort working with the Housing First principles. |
| Active, fulfilled lives | AFL13   | Number of households whose homelessness was prevented                                  |    | Yes<br>(DLUHC - quarterly H-CLIC returns, no target set)  | 101<br>(Mean Average CIPFA Near Neighbours - LG Inform)<br>Demand in some areas must be much higher. | 75              | 63              | 138                  | 24                     | 17                     | 22                | ↑G  | Higher is better | 252 (21 per month)                          | 18-21                             | Performance continues to fluctuate between months due to a variety of factors. This reflects the difficulties the Housing Options Team are having trying to secure accommodation solutions, particularly in the private sector in order to prevent or relieve households homelessness locally. There is a recognised need for the team to move its focus further upstream to maximise homelessness prevention opportunities and action plan is being developed in this regard.   |
| Active, fulfilled lives | AFL14   | Number of households whose homelessness was relieved                                   |    | Yes<br>(DLUHC - quarterly H-CLIC returns, no target set)  | 75<br>(Mean Average CIPFA Near Neighbours - LG Inform)<br>Demand in some areas must be much higher.  | 86              | 82              | 168                  | 22                     | 24                     | 36                | ↑G  | Higher is better | 300 (25 per month)                          | 22-25                             | Performance continues to fluctuate between months due to a variety of factors. This reflects the difficulties the Housing Options Team are having trying to secure accommodation solutions, particularly in the private sector in order to prevent or relieve households homelessness locally. There is a recognised need for the team to move its focus further upstream to maximise homelessness prevention opportunities and action plan is being developed in this regard.   |
| Active, fulfilled lives | AFL15   | Total number of homeless approaches  |    | Yes<br>(DLUHC - quarterly H-CLIC returns, no target set)  | n/a  | 1468            | 1404            | 2872                 | 525                    | 449                    | 430               | ↓   | N/A              | Tracking - monitoring levels of demand only | N/A                               | 3,863 households approached the Council as homeless during 2021/22, which is an average of 320 approaches per month. 4,778 households approached the Council as homeless during 2022/23. This is an increase of just over 900, and an average of 400 approaches per month. Currently the Housing Options Team have a live caseload of 1,141 cases. During September there was a slightly further decrease in the number of approaches from 449 to 430, this still remains high compared with the previous year.  |
| Active, fulfilled lives | AFL16   | Number of households accepted as owed the main housing duty                            |  | Yes<br>(DLUHC - quarterly H-CLIC returns, no target set)  | 63<br>(Mean Average CIPFA Near Neighbours - LG Inform)   | 108             | 130             | 238                  | n/a                    | n/a                    | 130               | ↑   | N/A              | 286 (72 per quarter)                        | TBD (currently using standard 5%) | This measure indicates the number of households that have been accepted by the Council as homeless due to being unintentionally homeless, eligible for assistance and have a priority need and for which the Council has been unable to achieve a positive housing solution during the prevention and relief stages of the process (AFL 13 and AFL 14). While an increase in positive prevention and relief cases by Housing Options Teams leads to more households leaving the homeless process before this stage, the ever increasing demand for service and focus on supporting prevention and relief cases have contributed to an increase in main duty acceptances in Q2 compared to the Q1.  |
| Active, fulfilled lives | AFL17   | Total number of households living in temporary accommodation                           |  | Yes<br>(DLUHC - quarterly H-CLIC returns, no target set)  | 202<br>(Mean Average CIPFA Near Neighbours - LG Inform)  | n/a             | n/a             | n/a                  | 233                    | 230                    | 239               | ↑   | Lower is better  | 245   | No tolerance                      | The number of households living in temporary accommodation remains fairly stable. We are starting to see the delivery of units through the Local Authority Housing Fund (LAHF) programme for homeless Afghan and Ukrainian families. As these placements will need to be retained on homelessness and temporary accommodation casebooks because of tenancy/letting issues, a future rise in the number of households living in temporary accommodation should be expected (LAHF round 1 should deliver 30 homes by November 2023, and a further 11 homes under LAHF round 2 will follow in 2024). This figure includes 4 LAHF units.<br><br>Note: This figure is for statutory duty placements only and does not include the additional cohort of rough sleepers accommodated using discretionary powers.  |
| Active, fulfilled lives | AFL18   | Number of households with family commitments living in bed and breakfast accommodation |  | Yes<br>(DLUHC - quarterly H-CLIC returns, no target set)  | 11<br>(Mean Average CIPFA Near Neighbours - LG Inform)   | n/a             | n/a             | n/a                  | 5                      | 2                      | 1                 | ↓G  | Lower is better  | 5   | No tolerance                      | As at 30/09/2023 there was one household with family commitments living in B&B; a woman with a child placed on 22/09/2023. This family is due to sign for self contained accommodation imminently (02/10/2023) leaving us with zero households with family commitments living in B&B.<br><br>Note: Households with family commitments are a) a pregnant woman; (b) with whom a pregnant woman resides or might reasonably be expected to reside; or, (c) with whom dependent children reside or might reasonably be expected to reside.  |
| Active, fulfilled lives | AFL19   | Number of rough sleepers rehoused into accommodation                                   |  | Yes<br>(DLUHC monthly rough sleeping survey, no target set)                                     | n/a  | 23              | 20              | 43                   | n/a Quarterly reported | n/a Quarterly reported | 20                | ↓R  | Higher is better | 84 per year (7 per month/ 21 per quarter)   | No tolerance                      | The Rough Sleeping Team continue to work hard to secure successful move on for rough sleepers within North Northants. Within the first two quarters of 23/24 there has been 43 rough sleepers rehoused into accommodation. During September the team helped to secure accommodation for 4 rough sleepers.  |



Adults & Housing

| Key Commitment           | Ref No. | Description of Performance Indicator                                     | Infographic / Chart | Statutory Reporting Required? (Yes / No)                 | Benchmark | Quarter 1 23-24 | Quarter 2 23-24 | Year to Date 2023-24 | July 2023/24 | August 2023/24 | September 2023/24 | Direction of Travel (since previous period) | Polarity         | Target                              | Tolerance    | Comments  |
|--------------------------|---------|--|---------------------|--|-----------|-----------------|-----------------|----------------------|--------------|----------------|-------------------|---|------------------|-------------------------------------|--------------|---|
| Active, fulfilled lives  | AFL24   | Number of Temporary Accommodation placements out of NN area              |                     | Yes<br>(DLUHC - quarterly H-CLIC returns, no target set) | TBD       | n/a             | n/a             | n/a                  | 1            | 1              | 1                 | →   | Lower is better  | 3                                   | No tolerance | The household that was recorded as living out of area on 30/09/2023 has since moved out of Temporary Accommodation. As at 02/10/2023 there are no households living in TA outside of North Northamptonshire.  |
| Safe and thriving places | STP38   | Percentage of rent collected   |                     | No   | n/a       | 96.37           | 97.28%          | 97.28%               | 96.08%       | 97.34%         | 97.28%            | ↓   | Higher is better | 97%                                 | 5%           | This is a cumulative rent collected as a percentage of rent owed figure. The amount of rent collected as a percentage of rent owed has remained above target in September 2023. In the Kettering area the September period does not include Universal Credit direct arrears recovery received on 28.09.23 as not processed by finance till October. Enforcement action still on 3 month wait from courts. Intensive work on rent collection will continue over the forthcoming winter months. |
| Safe and thriving places | STP11   | Number of (council housing) lettings completed                           |                     | Yes<br>(Annual LAHS return to DLUHC, no target set)      | n/a       | 137             | 131             | 268                  | 48           | 42             | 41                | ↓   | No polarity      | No target - tracking indicator only | N/A          | The number of lets in July (48), August (42) and September (41) remained steady. The weekly voids meeting has proven effective in managing voids as they arise and progress into the letting stage.   |
| Safe and thriving places | 12      | Number of (council house) dwellings vacant and ready to let at month end |                     | Yes<br>(Annual LAHS return to DLUHC, no target set)      | n/a       | n/a             | n/a             | n/a                  | 10           | 8              | 8                 | →   | Lower is better  | 10                                  | 10 to 15     | At the end of September there were 8 properties Ready to Let. The weekly void meetings are helping to ensure that this number is kept to a minimum.   |
| Safe and thriving places | STP36   | Number of voids - Kettering Area   |                     | No   | n/a       | n/a             | n/a             | n/a                  | 60           | 64             | 69                | ↑R  | Lower is better  | No target - tracking indicator only | N/A          | This indicator provides a snapshot at the month end of the number of live Housing Revenue Account (HRA) voids. At the end of September there was a slight increase in the number of voids. The overall NNC snapshot was at 126 compared with 120 as at the end of August. Note: This is the number of HRA voids only and does not include non-HRA temp, acquisitions or Out of Management properties.   |
|                          |         | Number of voids - Corby Area   |                     | No   | n/a       | n/a             | n/a             | n/a                  | 65           | 56             | 57                | ↑   | Lower is better  | No target - tracking indicator only | N/A          |   |

Adults & Housing

| Key Commitment           | Ref No.          | Description of Performance Indicator  | Infographic / Chart | Statutory Reporting Required? (Yes / No)                  | Benchmark                       | Quarter 1 23-24 | Quarter 2 23-24 | Year to Date 2023-24 | July 2023/24 | August 2023/24 | September 2023/24 | Direction of Travel (since previous period) | Polarity         | Target                              | Tolerance  | Comments  |
|--------------------------|------------------|---|---------------------|---|---------------------------------|-----------------|-----------------|----------------------|--------------|----------------|-------------------|---|------------------|-------------------------------------|--|---|
| Safe and thriving places | STP37a           | Average time taken to re-let NNC standard void properties                       |                     | Yes<br>(Annual LAHS return to DLUHC)                      | 8 weeks (56 days)<br>House Mark | 60.9 days       | 57.8 days       | 57.8 days            | 59.5 days    | 58.8 days      | 57.8 days         | ↓G  | Lower is better  | 56 days                             | 56 to 60 days                                    | From April 2023 onwards, void turnaround time is reported by standard and major properties for NNC. The figure reported is the cumulative average turnaround time for those properties let in the month. This will help remove the impact of a long-term major void when it has been empty for a long time and provide a more accurate reflection of void turnaround for standard properties.<br><br>In September 23, there were 29 standard void properties let. The total number of void days for these 29 properties was 1489 days, which provides a monthly average turnaround for September of 51.3 days. This has brought the cumulative average turnaround time down to 57.8 days, which is within the target tolerance.   |
| Safe and thriving places | STP37b           | Average time taken to re-let NNC major void properties                          |                     | No  | n/a                             | 217 days        | 248 days        | 248 days             | 301 days     | 243 days       | 248 days          | ↑   | Lower is better  | No target - tracking indicator only | N/A  | In September 2023 there were 9 major void properties let. These 9 properties had a total number of void days of 2448. The number of void days for these properties meant there was a slight increase in the overall cumulative average void days to 248 days. Using turnaround days for major voids at the present time is not the best indicator as there is no set approach to how major voids are resourced has been agreed. Number of major voids may be a more appropriate indicator to monitor.   |
| Safe and thriving places | STP08            | % of properties with a valid gas safety certificate                             |                     | Yes<br>(Regulator of Social Housing - TSM, no target set) | n/a                             | 99.8%           | 99.8%           | 99.8%                | 99.8%        | 99.6%          | 99.8%             | ↑G  | Higher is better | 100%                                | 99.5% and above is green, 99% and above is amber | As at the end of September, 19 out of total 7,898 properties did not have a valid gas certificate. Of the 19 properties outstanding, six are in the Corby area, with one was serviced on 29/09/2023 and awaiting Landlord Gas Safety Record (LGSR). One property was serviced on 02/10/2023, one property we are executing right to entry warrant on 03/10/2023 and three properties have a court date booked for 24/10/2023 to obtain right of entry warrants. In the Kettering area, one property is now void, and the remaining outstanding properties are going through the legal process to gain warrants for access. (We are limited in the number of properties we can take to court each fortnight to obtain right of entry warrants, so this can impact compliance).   |
| Safe and thriving places | STP09            | Total number of emergency repairs completed                                     |                     | Yes   | n/a                             | 1259            | 1331            | 2590                 | 405          | 424            | 502               | ↑   | N/A - Tracking   | N/A - monitoring levels of demand   | N/A  | This indicator measures the number of Emergency Responsive Repairs only which have been completed during the month. The number of emergency responsive repairs completed in July (405), August (424) and September (502) have been increasing month on month.   |
| Safe and thriving places | STP10            | Total number of non-emergency repairs completed                                 |                     | (Regulator of Social Housing - TSM, no target set)        | n/a                             | 1442            | 1886            | 3328                 | 557          | 730            | 599               | ↓   | N/A - Tracking   | N/A - monitoring levels of demand   | N/A  | This indicator measures the number of Non-Emergency Responsive Repairs only which have been completed during the month. There was a spike in the number of non-emergency responsive repairs completed in August (730) from (557 in July), this has reduced again to 599 in September.   |
| Safe and thriving places | Page 46<br>STP04 | Number of active households on Keyways (as at 1st month)                        |                     | No  | n/a                             | 5263            | 5642            | n/a                  | 5349         | 5527           | 5642              | ↑   | N/A - Tracking   | N/A - monitoring levels of demand   | N/A  | This provides a snapshot of the number of applicants active on the Council's housing Register (Keyways).<br><br>Total housing applications active have only slightly increased this month due to a number of applications being set to 'housed' following some administration work, however new applications being received remains high.<br><br>It is important to note that as applications are made active, previously active applications have the status changed to pending, suspended, closed, and housed. This figure therefore is not how many applications are being assessed in total. Annual renewals are currently suspended due to staff resources.<br><br>Once in place this will reduce the active total due to applicants who have had no-contact with the council or have experienced a change of circumstances. |
| Safe and thriving places | STP05            | Number of new Keyways applications received                                     |                     | No  | n/a                             | 1850            | 1793            | 3643                 | 643          | 582            | 568               | ↓   | N/A - Tracking   | N/A - monitoring levels of demand   | N/A  | Last month saw 568 new applications which was a small decrease on the previous month, however, still higher than the same month last year which was 530.<br><br>The year-to-date average stands at 607, in contrast to last year's average of 490 for the same period.  |
| Safe and thriving places | STP39            | Number of repair jobs awaiting completion                                       |                     | No  | n/a                             | 1,188           | 1,326           | n/a                  | 1,266        | 1,223          | TBD               | ↑   | N/A - Tracking   | N/A - monitoring levels of demand   | N/A  | On review of the data, an error in the figures has been picked up. The 2023-24 data is currently being reviewed by the team and the data and commentary will be updated as soon as possible.  |
| Safe and thriving places | STP40            | Number of repair jobs awaiting completion which are outside of target timescale |                     | No  | n/a                             | 762             | 1015            | n/a                  | 844          | 671            | TBD               | ↑   | N/A - Tracking   | N/A - monitoring levels of demand   | N/A  | On review of the data, an error in the figures has been picked up. The 2023-24 data is currently being reviewed by the team and the data and commentary will be updated as soon as possible.  |

## North Northamptonshire Council Performance Report - September / Q2 2023

### Key to Performance Status Colours

| Progress Status Key:   |
|--|
| Green - On target or over-performing against target  |
| Amber - Under-performing against target but within 5% corporate tolerance (or other agreed tolerance as specified) |
| Red - Under-performing against target by more than 5% (or other agreed tolerance as specified)                     |
| Dark Grey - Data missing   |
| Grey - Target under review   |
| Turquoise - Tracking Indicator only  |
| Children's Trust Progress Status Key:  |
| Green - At target or better  |
| Amber - Below target - within tolerance  |
| Red - Below target - outside tolerance   |
| Grey - No RAG  |

| Direction of Travel Key  |  |
|--|--|
| An acceptable range = within 5% of the last period's performance |  |
| ↑G   | Performance has improved from the last period – Higher is better   |
| ↓G   | Performance has improved from the last period – Lower is better  |
| ↑  | Performance has deteriorated but is still on or above target or within an acceptable range of 5% of the last period – Lower is better  |
| →  | Performance has stayed the same since the last period  |
| ↓  | Performance has deteriorated but is still on or above target or within an acceptable range of 5% of the last period – Higher is better |
| ↑R   | Performance has deteriorated from the last period – Lower is better  |
| ↓R   | Performance has deteriorated from the last period – Higher is better   |
| ↑  | Actual increased - neither higher or lower is better   |
| ⇌  | Actual has stayed the same since the last period - neither higher or lower is better   |
| ↓  | Actual decreased - neither higher or lower is better   |

| Children's Trust Direction of Travel Key |                                       |
|--|---------------------------------------|
| ↑G                                       | Performance improved since last month |
| →  | Performance the same as last month    |
| ↓A                                       | Performance declined since last month |

### Performance Terminology key

|                               |  |
|-------------------------------|--|
| TBC                           | To be confirmed  |
| TBD                           | To be determined   |
| n/a                           | Not applicable   |
| Actual                        | The actual data (number/percentage) achieved during the reporting period   |
| Benchmark                     | A comparator used to compare the Council's performance against. The 2020/21 average for Unitary Councils in England has been used where available unless otherwise stated. |
| Numerator                     | Number as part of the percentage calculation which shows how many of the parts indicated by the denominator are taken. See example below.                                  |
| Denominator                   | The total number which the numerator is divided by in a percentage. See example below.   |
| EXAMPLE Performance Indicator | % Calls answered   |
| Numerator                     | Number of calls answered   |
| Denominator                   | Total number of calls received   |

Customer & Governance

Organisational workforce data from Human Resources

| Key Commitment         | Ref No. | Description of Performance Indicator   | Infographic / Chart   | Statutory Reporting Required? (Yes / No)   | Benchmark  | Year to Date 2023-24                | Quarter 1 2023-24                  | Quarter 2 2023-24                  | Direction of Travel (since previous period) | Polarity        | Target                              | Tolerance                    | Comments   |
|------------------------|---------|--|---|--|--|-------------------------------------|------------------------------------|------------------------------------|---|-----------------|-------------------------------------|------------------------------|--|
| Modern Public Services | MPS06   | Average number of working days lost per Full time Equivalent (FTE) employee (short term)   |   | No   | 13.1<br>(Mean average GIPFA near neighbours 2020/21) | 1.5 Fte days lost per Fte employee  | 0.7 Fte lost per Fte employee      | 0.8 Fte lost per Fte employee      | ↑R  | Lower is better | Full year 3.3 (0.83 per quarter)    | 15% (up to 0.95 per quarter) | Sickness levels for both short-term and long-term have increased since last quarter, which is to be expected as we enter the autumn/winter months. |
|                        | MPS07   | Average number of working days lost per Full time Equivalent (FTE) employee (long term)  |   | (Nationally Reported so able to benchmark) | 9.9<br>(LG English Unitary national average 21/22)   | 4.12 Fte days lost per Fte employee | 1.9 Fte days lost per Fte employee | 2.3 Fte days lost per Fte employee | ↑R  | Lower is better | Full year 6.5 (1.63 per quarter)    | 15% (up to 1.87 per quarter) |  |
| Modern Public Services | MPS11   | Amount of Spend on Agency Staff within each Directorate<br><br>(TOTAL SPEND - finance data, including opus spend and off-contract spend) | <p>Apr to Sep (year to date) spend split by directorate</p> | No   |  | £11,001,303                         | £5,172,498                         | £5,828,805                         | ↑R  | Lower is better | No target - tracking indicator only | N/A                          |  |

## Customer & Governance

### Organisational Workforce data from Human Resources

| Data as at 30th September 2023   |       |   | Adults, Health Partnerships and Housing | Chief Executive Office | Childrens Services | Customer & Governance | Finance & Performance | Place and Economy Services | Transformation | NNC Total      |
|--|-------|---|---|------------------------|--------------------|-----------------------|-----------------------|----------------------------|----------------|----------------|
| <b>Employees</b>   | MPS08 | <i>Headcount</i>                            | 1366                                    | 61                     | 203                | 226                   | 181                   | 637                        |                | <b>2674</b>    |
|  |       | <i>Fte</i>                                  | 1165.43                                 | 55.85                  | 118.19             | 196.63                | 166.11                | 596.41                     |                | <b>2298.62</b> |
| <b>Posts</b>   | MPS44 | <i>Headcount</i>                            | 1792                                    | 78                     | 281                | 335                   | 255                   | 836                        |                | <b>3577</b>    |
|  |       | <i>Fte</i>                                  | 1839.73                                 | 75.72                  | 269.49             | 305.54                | 240.66                | 772.48                     |                | <b>3503.62</b> |
| <b>Vacancies</b>   | MPS09 | <i>Number*</i>                              | 46                                      | 0                      | 2                  | 10                    | 0                     | 6                          |                | <b>64</b>      |
| <b>Agency</b>  | MPS10 | <i>Temporarily Covering Vacancies</i>       | 172                                     | 12                     | 43                 | 25                    | 27                    | 60                         |                | <b>339</b>     |
|  | MPS45 | <i>Supernumerary</i>                        |   |                        | 20                 |                       |                       | 19                         |                | <b>39</b>      |
|  | MPS11 | <i>Total Agency Spend (£000s)</i>           | £1,852                                  | £167                   | £1,335             | £522                  | £351                  | £1,574                     | £28            | <b>£5,829</b>  |
| <b>Absence</b> (Quarterly and Projected are shown as Fte days lost per Fte employee) | MPS49 | <i>% of workforce to have sickness**</i>    | 30%                                     | 5%                     | 15%                | 24%                   | 18%                   | 23%                        |                | <b>26%</b>     |
|  | MPS50 | <i>No' of emp'ees to hit trigger***</i>     | 165                                     |                        | 8                  | 15                    | 9                     | 51                         |                | <b>248</b>     |
|  | MPS07 | <i>Qtly (LT)</i>                            | 2.8                                     | 0.5                    | 1.2                | 1.9                   | 1.7                   | 2.0                        |                | <b>2.3</b>     |
|  | MPS06 | <i>Qtly (ST)</i>                            | 1.0                                     | 0.4                    | 0.6                | 0.9                   | 0.4                   | 0.8                        |                | <b>0.8</b>     |
|  | MPS51 | <i>Projected</i>                            | 14.0                                    | 2.2                    | 7.1                | 9.5                   | 6.4                   | 10.1                       |                | <b>11.3</b>    |
| <b>Voluntary Turnover</b>  | MPS46 | <i>No' of Voluntary Leavers (Employees)</i> | 41                                      | 2                      | 6                  | 2                     | 3                     | 16                         |                | <b>70</b>      |
|  |       | <i>% of workforce (quarterly)</i>           | 3.0%                                    | 3.3%                   | 3.0%               | 0.9%                  | 1.7%                  | 2.5%                       |                | <b>2.6%</b>    |
|  |       | <i>Rolling Voluntary T/O</i>                | 13.0%                                   | 13.4%                  | 13.4%              | 8.5%                  | 9.8%                  | 10.5%                      |                | <b>11.9%</b>   |
| <b>Starters</b>  | MPS48 | <i>No' of Starters (Employees)</i>          | 109                                     | 2                      | 12                 | 10                    | 4                     | 25                         |                | <b>162</b>     |
|  |       | <i>% of workforce (quarterly)</i>           | 8.0%                                    | 3.3%                   | 5.9%               | 4.4%                  | 2.2%                  | 3.9%                       |                | <b>6.1%</b>    |

Absence Benchmark - 9.9 (Long Term 6.5, Short Term 3.4)

Turnover Benchmark - 12.7%

Employee, Post, Vacancy and Agency Worker data is as at the end of the quarter - number of agency workers is provided by the service  
Agency Spend, Absence, Leavers and Starters data is the combined monthly figure for the quarter

\* vacancies currently advertised on e-recruitment

\*\* Average employee headcount for the quarter divided by the number of unique resource ID's to have had sickness for the quarter

\*\*\* unique resource ID's to have hit a trigger for the quarter

This page is intentionally left blank

## EXECUTIVE 16<sup>th</sup> November 2023

|                      |  |
|----------------------|--|
| <b>Report Title</b>  | <b>Public Spaces Protection Order – Dog Control</b>  |
| <b>Report Author</b> | Graeme Kane – Executive Director for Place and Economy (Interim)   |
| <b>Lead Members</b>  | Cllr Mark Rowley, Executive Member for Housing, Communities and Levelling Up<br><br>Cllr David Brackenbury, Executive Member for Growth and Regeneration |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

**Appendix A** – Proposed Public Spaces Protection Order 2023 – Dog Control

**Appendix B** – Stage 1 consultation questionnaire

**Appendix C** – Consultation responses from stage 1 consultation

**Appendix D** – Consultation responses from stage 2 consultation

**Appendix E** – Equalities Screening Assessment

### **1. Purpose of Report**

---

- 1.1 To update members on the findings of the two-stage consultation exercise on the proposed North Northamptonshire Council Public Spaces Protection Order (PSPO) - Dog Control.
- 1.2 To present a new authority wide Dog Control PSPO based upon the consultation to replace the previous existing PSPO's of the former sovereign areas of Wellingborough, Kettering and East Northamptonshire which are due to expire in November 2023 and to include the former sovereign area of Corby.

## **2. Executive Summary**

---

- 2.1 On 8<sup>th</sup> June 2023 the Executive approved the commencement of a consultation process on a North Northamptonshire PSPO for dog control.
- 2.2 A two stage consultation process has since taken place, the results of which have informed the development of the PSPO which is provided in **Appendix A**. This paper sets out the method of consultation and a summary of the responses.
- 2.3 Approval is now sought to bring the PSPO into force in November 2023.

## **3. Recommendations**

---

- 3.1 It is recommended that the Executive, having regard to the conditions within S.59 of the Anti-social Behaviour, Crime and Policing Act 2014, approves the Public Spaces Protection Order (PSPO) (**Appendix A**), to continue to provide ongoing powers to enforcement officers to tackle dog fouling and other forms of irresponsible dog ownership across North Northamptonshire.
- 3.2 Reason for Recommendations – having one aligned PSPO in place for dog control, will bring all existing conditions and controls together in one place, will remove inconsistencies across the areas and make enforcement more straightforward and easier to understand for the public. The updated PSPO will also extend the provisions to the Corby area for the first time.
- 3.3. Alternative Options Considered – the existing PSPO's within the previous sovereign areas of Wellingborough, Kettering and East Northamptonshire could be extended; amended; or revoked or could be left to expire in November 2023. However, having one aligned PSPO in place would remove inconsistencies that having three PSPO's creates and if they were allowed to lapse, this could increase dog fouling and dog control complaints and issues.

## **4 Report Background**

---

- 4.1 The Anti-social Behaviour, Crime and Policing Act 2014 provides local authorities with powers to create a PSPO where they are satisfied that activities carried on in a public place:
  - have had, or are likely to have, a detrimental effect on the quality of life of those in the locality;
  - is, or is likely to be, persistent or continuing in nature;
  - is, or is likely to be, unreasonable; and
  - justifies the restrictions imposed.
- 4.2 There are currently three PSPOs in place from the legacy authorities in Wellingborough, Kettering and East Northants in relation to dog control. There are no PSPOs for dog control covering Corby. The three orders will expire in



November 2023 and therefore it is necessary to replace these orders with a new PSPO for dog control covering North Northamptonshire.

- 4.3 Unless specified, the PSPO will cover any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission (s 74(1) of the Act). This means that the measures will also apply to agricultural land.
- 4.4 A PSPO will cease to have an effect after 3 years; however, that period can be extended for a further 3 years if it continues to be necessary.
- 4.5 The measures do not apply to assistance dogs used by the blind community or by persons who lack the physical ability to comply with the requirements of the PSPO.
- 4.6 On 8<sup>th</sup> June 2023 the Executive approved the commencement of a consultation process on a North Northamptonshire PSPO for dog control.
- 4.7 At the Executive a draft PSPO was presented which had previously been subject to consideration by both the Sustainable Communities Executive Advisory Panel (EAP) on 26<sup>th</sup> April 2023 and the Prosperous Communities EAP on 11<sup>th</sup> May 2023. A pre-consultation exercise also took place with the Town and Parish Councils with a deadline for response of 20<sup>th</sup> April 2023.
- 4.8 The first stage consultation process ran from 22<sup>nd</sup> June 2023 to 3<sup>rd</sup> August 2023. The consultations took the form of an online questionnaire, with paper copies available to be printed which can be found in **Appendix B**. To advertise the consultations:
  - The link to the survey was placed prominently on the Council website.
  - Letters were sent to a number of housing associations as well as schools.
  - Notifications and details were sent to all Parish Clerks and councillors.
  - An article was provided to the Evening Telegraph.
  - Messages were sent from the Council social media accounts.
  - Letters were sent to interested parties such as the Kennel Club & Dogs Trust.
- 4.9 Responses to the first stage consultation can be found in **Appendix C**. A total of 180 responses were received, out of these 85 did not own a dog, with 8 not stating and 4 operating a dog walking service. Respondents were mainly local residents, but also Town and Parish Councillors, Housing associations, those working and visiting the area, Council officers, and interested parties. It is considered that this is a representative balance of the community.
- 4.10 Responses and comments arising from the consultation process have been analysed. The results showed support across the board for creating one harmonised PSPO. It was viewed that this made sense in terms of unity, to ensure that all areas are treated equally and that creating one rule would prevent confusion over what is required.

- 4.11 **Fouling of Land by Dogs Order** - 91% of respondents tended to or strongly agreed with this requirement of the proposed PSPO and it was perceived that dog fouling issues are a problem within the North Northamptonshire area.
- 4.12 The Dogs Trust responded stating that they “consider ‘scooping the poop’ to be an integral element of responsible dog ownership and would fully support a well-implemented order on dog fouling”.
- 4.13 The Kennel Club advised that they “strongly promote responsible dog ownership and believe that dog owners should always pick up after their dogs wherever they are, including fields and woods in the wider countryside, and especially where farm animals graze to reduce the risk of passing Neospora and Sarcocystosis to cattle and sheep respectively”.
- 4.14 The proposed Order raised comments regarding the number of incidents in which persons have bagged up dog faeces and then failed to dispose of them correctly, i.e., into nearby bushes. As outlined at the Executive in June 2023 this would be covered under littering offence powers. It has been highlighted that such bags are also thrown onto private land to which littering offences do not apply. Such acts could be covered by enforcement under the Anti-Social Behaviour, Crime and Disorder Act, 2014.
- 4.15 In response to the points raised, the following highlighted words have been added to Paragraph 6 of the Order.
- “If a dog defecates at any time on land to which this order applies, a person who is in charge of the dog at the time must remove the faeces from the land forthwith and dispose of it in an appropriate manner.”*
- The proposed PSPO also states: *Placing the faeces in a receptacle on the land, which is provided for the purpose, or for the disposal of waste, shall be sufficient removal from the land.*
- 4.16 Comments were raised as part of the consultation about the provision of dog waste bins within North Northamptonshire and the need for them to be regularly maintained. The Dogs Trust advised that in order to maximise compliance, they urge the Council to consider whether an adequate number of disposal points have been provided for responsible owners to use, to consider providing free disposal bags and to ensure that there is sufficient signage in place.
- 4.17 Some comments were raised about fines for not carrying waste bags. The Dogs Trust questioned the effectiveness of issuing on-the-spot fines for not being in possession of a poo bag and whether this is practical to enforce, a measure the Council is not proposing to include within the Order.
- 4.18 In addition to enforcement, education was seen as an integral component of responsible dog ownership. The Kennel Club outlined some proactive measures that could be taken which can include communicating to local dog owners that bagged dog faeces can be disposed of in normal litter bins; running

responsible ownership and training events; or using poster campaigns to encourage dog owners to pick up after their dog.

- 4.19 **Dog Exclusion Order** - the majority of respondents (74%) tended to, or strongly agreed with this provision within the proposed PSPO.
- 4.20 A few respondents felt it unfair to exclude dogs from cemeteries in terms of their viewed status as a family member. This was also reiterated by the Kennel Club, which stated that dogs can provide essential comfort and emotional support to an individual suffering from the loss of a loved one. There are however only three cemeteries with this proposed restriction within the Council area. No specific comments were made during the consultation about those listed.
- 4.21 The Dogs Trust advised that they accept that there are some areas where it is desirable that dogs should be excluded, such as children's play areas, however they recommend that exclusion areas are kept to a minimum and that, for enforcement reasons, they are restricted to enclosed areas. They consider it more difficult to enforce an exclusion order in areas that lack clear boundaries. The Council proposed order complies with this guidance, in that all the children play areas included have a clearly defined boundary. Children's play areas that are not enclosed do not form part of the proposed PSPO.
- 4.22 It was highlighted within the consultation responses that clear signage is important for all aspects of the proposed Order. The local authority's plans in relation to signage are discussed at paragraph 7.1.2. The Dogs Trust also highlighted the need to provide plenty of signage to direct owners to alternative areas nearby in which to exercise dogs. This aspect will be investigated by the Council in relation to the Schedule 1 and 2 areas.
- 4.23 The Kennel Club advised that they do not typically oppose Orders to exclude dogs from playgrounds or enclosed recreational grounds, such as skate parks or tennis courts, as long as alternative provisions are made for dog walkers in the vicinity. They advised that children and dogs should be able to socialise together quite safely under adult supervision, with having a child in the home the biggest predictor for a family owning a dog. The Council has only a limited number of Schedule 2 areas and has sufficient other areas to meet this guidance.
- 4.24 Regarding playing fields the Kennel Club asks local authorities to consider whether or not access restrictions are absolutely necessary. If they are deemed to be so, time or seasonal restrictions may be more appropriate than a continuous exclusion order. We are aware that in many areas, dog walkers do allow their dogs to exercise on playing fields when they are not in use. This guidance is considered within the proposed PSPO order.
- 4.25 The Dogs Trust understands the safety concerns underpinning restrictions while the playing fields are in use. They also wished for it to be noted that compliance with such an order can be difficult for dog walkers if there are no boundaries around the playing field, given that dogs will not recognise the difference between playing fields and other grassed areas.

- 4.26 **Dogs on Leads by Direction Order** - 74% of respondents supported this provision within the proposed PSPO.
- 4.27 The Dogs Trust advised that it enthusiastically supports 'Dogs on Leads by Direction' orders (requirement for dogs that are considered to be out of control or causing alarm or distress to members of the public, to be put on and kept on a lead when directed to do so by an authorised official).
- 4.28 The Dogs Trust consider that this order is by far the most useful, other than the fouling order, because it allows enforcement officers to target the owners of dogs that are allowing them to cause a nuisance without restricting the responsible owner and their dog.
- 4.29 **Dogs on lead Order** - 69% of respondents tended to agree or strongly agree with the proposal on the specified areas within Schedule 1.
- 4.30 The Dogs Trust advised that they accept that there are some areas where it is desirable that dogs should be kept on a lead. The Dogs Trust urge the Council to consider the Animal Welfare Act 2006 section 9 requirements (the 'duty of care') that include the dog's need to exhibit normal behaviour patterns – this includes the need for sufficient exercise including the need to run off the lead in appropriate areas. Dog Control Orders should not restrict the ability of dog keepers to comply with the requirements of this Act. They also advised that the Council should ensure that there is an adequate number, and a variety of, well sign-posted areas locally for owners to exercise their dog off the lead.
- 4.31 The Kennel Club advised that they can support reasonable 'dogs on lead' Orders which can, when used in a proportionate and evidence-based way, include areas such as cemeteries, picnic areas, or on pavements in proximity to cars and other road traffic. However, they will oppose PSPOs which introduce blanket restrictions on dog walkers accessing public open spaces without specific and reasonable justification. They advised that dog owners are required to provide their dogs with appropriate daily exercise, including "regular opportunities to walk and run", which in most cases will be off lead while still under control and that the ability to meet this requirement is greatly affected by the amount of publicly accessible parks and other public places in their area where dogs can exercise without restrictions. The Council has a limited number of Schedule 1 areas which have been included with reasonable justification and has sufficient other areas within the local authority for dogs to exercise without restrictions.
- 4.32 The views of both of these parties were also expressed within the public consultation responses.
- 4.33 **Fixed lead length as part of the Dogs on Lead Order** - 29% of respondents felt that the 1.8 metres lead length rule from the current Kettering Dog Control PSPO should be extended to the North Northamptonshire proposed Order. 17% responded that they perceived that this would be difficult to enforce and that it should not be included in the proposed order. The remainder did not know or did not answer this section of the questionnaire.

- 4.34 Comments were raised as part of the consultation in terms of a Dogs on Lead Order, that the lead needs to be capable of ensuring a dog is under proper control. Concerns over training leads were also outlined.
- 4.35 It is proposed to increase the lead length requirement to 2 metres, in line with the fixed length stipulated under the Countryside and Rights of Way Act (Schedule 2). Within the 'purpose of the order' section of the proposed PSPO, the following wording has been added: *In relation to the requirement for a dog to be on a lead, extendable leads are acceptable, but they must be locked at a length of 2m or less.*
- 4.36 **Number Restriction Order** – 48% of respondents felt that the number of dogs one person can walk at any one time should be restricted to 6, 23% felt this specification should not be included in any new proposed order and 29% did not know or did not answer.
- 4.37 The proposed PSPO does not include this restriction. It is understood that DEFRA is currently reviewing issues around dog walkers and the numbers of dogs that they can safely walk, therefore it would not be appropriate to implement new requirements that may be contradictory to any new proposals. National guidance available by the dog walkers' association recommends FOUR at any one time:
- <https://www.rspca.org.uk/webContent/staticImages/Downloads/DogWalkingGuide.pdf>
- 4.38 In addition, there is no substantial evidence from Kettering or other areas that this is a particular issue within the local authority area.
- 4.39 **New dog control areas** - several new areas were listed within the draft PSPO included in the first consultation stage. This followed consideration of comments received from Town and Parish Councils and internal colleagues and was consistent with signage already in place within Corby. Responses received were not sufficient to suggest a need to remove these areas from the proposed PSPO and the second consultation stage.
- 4.40 Following the first stage consultation, several requests were received for new areas to be considered for inclusion in the 'Dog on Leads Order' section of the Council's PSPO.
- 4.41 Requests were received from Natural England, the Wildlife Trust and the Council's planning policy team, for all of the infilled Upper Nene Valley Gravel Pits Special Protection Area (SPA) sites to be included within the proposed PSPO Schedule as 'dog on leads' areas, in order to protect wildlife. Supporting background information was provided. Some of the areas highlighted were already included within the former sovereign PSPO's and in the draft PSPO presented to the Executive in June 2023 following initial consultation. New areas include:
- Northampton Washlands

- Nene Wetlands Nature Reserve
  - Kinewell Lake
  - Titchmarsh Nature Reserve
- 4.42 The description of the Upper Nene Valley Gravel Pits SPA's have been slightly varied within the proposed PSPO within **Appendix A**, in line with comments provided by the partners outlined above. It will be considered whether maps for these areas will be included within the PSPO or on the Council website for a more accurate description of the location.
- 4.43 Bozeat Parish Council has recently received a gold award for wildlife work undertaken by a group of volunteers at St Marys Church and have requested that the closed church yard is included within the Schedule for a 'dog on leads' area.
- 4.44 Raunds Parish Council requested as part of the first stage consultation process, to remove the skate park in Amos Lawrence Park as a 'dog exclusion zone' as it has been decommissioned due to vandalism and asked for consideration of making this area a 'dog on leads' zone instead. It was also requested due to concerns raised by the community, that Bassford Recreation Ground and Millfield Park are implemented as 'dogs on leads' areas during events.
- 4.45 The implementation of 'dogs on leads' requirements on public rights of way footpaths and bridleways, was raised during the first stage consultation and at the Executive. This remit can be covered by the Countryside and Rights of Way Act 2000 (Schedule 2) and due to the extensive area, it is not viewed as being practicable in terms of enforcement, so it is not recommended that this is added into the PSPO.
- 4.46 Late responses were received from Rushton Parish Council for the inclusion of specified allotments and Wollaston Parish Council for Wollaston Playing fields to be considered as either a 'dog on lead' or 'exclusion area'. It is understood that it was the intention for Wollaston Parish Council to submit this as part of the pre-consultation exercise, but it was not received by the team and was re-submitted after the second consultation exercise had begun. Requests received after the first stage consultation has closed, cannot be considered, since they will not be subjected to adequate public consultation.
- 4.47 Should the Parish Councils wish to pursue this application, a further report to members to consider proposals for their addition into the PSPO could be submitted at a later date, or the introduction of an additional PSPO could be considered if required, however the same procedures would have to be followed.
- 4.48 Several other areas were highlighted for inclusion as Schedule 1 or 2 areas from respondents as part of the first stage consultation, however there was deemed to be an insufficient evidence base for inclusion in the proposed PSPO.

- 4.49 A revised draft PSPO was made following the outcome of the first stage consultation process, taking into account the above, which was reviewed and considered by the legal team. A second stage consultation process then took place on the proposed final order for a period of four-weeks between 31<sup>st</sup> August 2023 and 28<sup>th</sup> September 2023.
- 4.50 72 responses were received as part of the second stage consultation, the results of which can be seen in **Appendix D**. 72% of the respondents strongly agreed or agreed with the contents of the proposed PSPO for dog control.
- 4.51 In addition, respondents were provided with the opportunity to make specific comment representations. Several of the responses were similar to those raised in the first stage consultation which have been addressed and discussed above and as a result will not be repeated. New comments are highlighted with a considered response below.
- Sywell and Irchester Country Parks are listed but not Fermyn Woods or Barnwell Country Park – failure to pick up dog faeces and dog exclusion from fenced children's play areas will be enforceable in all country parks. The wildlife refuge in Sywell is included as an area where dogs must be kept on leads because it is a gated nature reserve. A decision has been made in consultation with the country parks team to remove Irchester main hub area from the proposed PSPO due to the lack of defined boundaries within this area to ensure that this would be enforceable.
  - Corby does not have as many named areas within Schedule 1 or 2 of the proposed PSPO – as Corby does not currently have an Order in place in relation to dog control, a scoping exercise was conducted by officers prior to the commencement of the process. Any areas with an inferred control through signage were included within the proposed PSPO. A pre-consultation process was also conducted with Parish and Town Councils and internal departments to highlight any areas to be considered for inclusion. No significant responses were raised as part of the first stage initial consultation for inclusion of additional areas within Corby. The former sovereign areas of Kettering, Wellingborough and East Northamptonshire have previously had in place a number of orders for dog control which would have resulted in the introduction of further areas over time.
  - Several other areas were highlighted for inclusion as Schedule 1 or 2 areas as part of the stage 2 consultation - as they were not significantly raised at either the pre-consultation, EAP, Executive or the stage 1 consultation, they cannot be included at this stage, since they have not been through the stage 2 consultation process.
  - Not all assistance dogs are trained by a prescribed charity – this aspect was also raised by the Kennel Club and is discussed further in paragraph 7.8 of this report.
  - Due to dog attacks, muzzles should be considered within a PSPO - this is not something the Council would consider appropriate to be addressed within a

PSPO. Complaints concerning dog attacks are processed by the Council and partners utilising other legislative powers.

- 4.52 A formal response to the proposed PSPO was received by the Kennel Club on 26<sup>th</sup> September 2023 and the Dogs Trust on 21<sup>st</sup> September 2023. The comments from both these interested parties have been considered in the formation of the proposed PSPO in **Appendix A** and within the body of the report.

## **5 Issues and Choices**

---

- 5.1 There are several options in terms of the PSPO's for Dog Control within North Northamptonshire, as detailed in paragraphs 3.1 to 3.3.
- 5.2 A proposed Council-wide PSPO for Dog Control is included within this report as the recommended way forward.

## **6 Next Steps**

---

- 6.1 The results of the consultation have informed the development of the PSPO which is provided in **Appendix A**.
- 6.2 If the Executive authorises the proposed PSPO there is a further requirement for publicity within the Anti-Social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations. These require that where a local authority has made a PSPO, they must publish it on its website and erect such notices as it considers sufficient to advise members of the public that the PSPO has been made and the effect of such an order.
- 6.3 It is possible that due to the very tight timescales, ensuring sufficient public consultation and the authorities reporting cycles that the existing orders may lapse for a short period before the new order comes into force. At present we estimate this to be less than a week or so, but this may be extended due to unforeseen circumstances.
- 6.4 For a period of three months after the introduction of the PSPO, officers will use their discretion and adopt an informal/educational approach to the enforcement of the legislation in any additional new areas. During this period a campaign will run aimed at alerting the public to the new PSPO and to engage with the parishes, particularly on the issue of replacement signage and patrolling of hotspots.
- 6.5 Under the Anti-Social Behaviour, Crime and Policing Act, 2014, the Council and partners are able to issue Fixed Penalty Notices and to take prosecutions for failure to comply with the provisions within the PSPO. It is intended that fixed penalty notices will continue to be issued with a fine set at £100.



## **7 Implications (including financial implications)**

---

### **7.1 Resources, Financial and Transformation**

- 7.1.1 Enforcement of the existing PSPO's is met within different service areas: Environmental Health, Waste Enforcement and Environmental Wardens/Street Scene. Enforcement will continue to be met by existing resource provisions.
- 7.1.2 Signage for additional areas will be required to be erected and existing signs will need to be replaced. These costs will be covered within the Environmental Health budget. The presence of signage acts as a deterrent to the occurrence of anti-social behaviour associated with irresponsible dog ownership.
- 7.1.4 Self-adhesive dog fouling signs are posted in areas where dog fouling is deemed to be a problem. This is an ongoing cost currently met by the Environmental Health team.
- 7.1.5 The Council retains any revenue from the payment of fines of £100 each.
- 7.1.6 Unknown costs would include the legal costs for pursuing unpaid fines and possible legal challenges about the validity of such an order being introduced.
- 7.1.7 It is not considered that the new measures will add significantly to the work undertaken by current officers, there are however no resources currently available to extend this enforcement.

### **7.2 Legal and Governance**

- 7.2.1 Local Authorities are empowered by S. 59 of the Anti-Social Behaviour, Crime and Policing Act 2014, to make Public Spaces Protection Orders ('PSPOs'); which can be used as a vehicle by which to enforce Dog Control Orders.
- 7.2.2 PSPO's provide a constable (or other authorised person as defined in the 2014 Act) ('officers') powers to take steps to tackle activities within the public place which are being carried out in contravention of the PSPO. The conditions to be satisfied before a PSPO can be made are set out in S.59 of the 2014 Act and the procedure to be followed is set out in S.72 of the 2014 Act.
- 7.2.3 The Antisocial Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014, provide guidance on the publication of the PSPO's. Further guidance in relation to the making of a PSPO is set out by the Home Office (Anti-Social Behaviour powers: statutory guidance for frontline professionals) updated 27 March 2023.
- 7.2.4 Before a PSPO can be made the Local Authority must be satisfied (on reasonable grounds) that the activity or behaviour concerned, carried out, or likely to be carried out, in a public space:
- has had, or is likely to have, a detrimental effect on the quality of life of those in the locality;

- is, or is likely to be, persistent or continuing in nature;
- is, or is likely to be, unreasonable; and
- justifies the restrictions imposed.

7.2.5 A PSPO gives powers to an officer to regulate the activity which is subject to the PSPO. The authority to use these enforcement powers are delegated to officers to act under the scheme of delegation.

7.2.6 If a person breaches the terms of the PSPO, they commit a criminal offence for which they may be liable to the payment of a Fixed Penalty Notice ('FPN') of £100; and/or prosecution with a maximum fine of £1,000.

7.2.7 Any challenge to the PSPO must be made in the High Court by an interested person within six weeks of it being made. An "interested person" is someone who lives in, regularly works in, or visits the restricted area. The right to challenge the validity of the order will also exist where an order is varied by a council. An "interested person" will be excluded from challenging the validity of the Order (including a decision to vary the order) by way of judicial review (see: s.66(7) of the 2014 Act). Other persons who fall outside the definition of an "interested person" will have the right to bring a judicial review to challenge the lawfulness of the use of the power to make the PSPO.

7.2.8 A PSPO can remain in force for a maximum period of three years from the commencement date. At any point before expiry, the Council can extend a PSPO by up to three years if they consider it is necessary to prevent the original behaviour from occurring or recurring. They should also consult with the local police and any other community representatives they think appropriate before doing so.

7.2.9 The Council can vary the terms of the order at any time. Any proposed variation to an existing PSPO would require the Council to undertake the necessary consultation on the proposed changes.

7.2.10 As well as varying the Order, a Council can also seek to discharge it at any time, for instance when the issue that justified the Order has ceased or where the behaviour has stopped or the land ceases to be classified as a public space.

### 7.3 Relevant Policies and Plans

7.3.1 Environment – A North Northamptonshire Council PSPO for Dog Control will play an important part in maintaining a '*Green sustainable environment*'.

7.3.2 It is anticipated that a reduction in dog fouling incidents and incidents associated with out-of-control dogs, will improve public amenity and have positive environmental benefits.

7.3.3 If because of the introduction of the new PSPO, dog fouling and other forms of irresponsible dog ownership is reduced, this will have a beneficial impact on the protection and enhancement of the environment.

## 7.4 Risk

| <b>Nature of risk</b>  | <b>Consequences if realised</b>   | <b>Likelihood of occurrence</b> | <b>Control measures</b>   |
|--|---|---------------------------------|---|
| Dog Control PSPO's are not renewed, amended or implemented.  | Unable to enforce dog control measures<br><br>Certain areas requested by the public are not covered by the Order. | High                            | Introduce new PSPO prior to expiry of existing orders.  |
| Additional Dog Control signage is not erected.               | Unable to enforce dog fouling and other dog control measures  | High                            | Order new signage after PSPO approved and arrange with NNC staff to promptly install in all new/changed areas |
| The Council is challenged on the introduction of a new PSPO. | The order would not be valid. The Council would incur court costs and reputational damage.                        | Low                             | Wide consultation with public and stakeholders  |

## 7.5 Consultation

- 7.5.1 The Consultation and Engagement Team and the Communications Team were involved in designing a full and meaningful consultation. This assisted in ensuring that all relevant groups were consulted with, and that the consultation was available in a number of different formats to enable as many people as possible to take part. This included an online survey, paper versions available in libraries and Council offices, access to the survey via social media and direct consultation mailings to key groups.
- 7.5.3 A two-stage consultation process was undertaken, the first stage taking place for six-weeks to gather all initial views and considerations on the draft proposals. The second consultation was open for four-weeks and was utilised to refine the final proposed order based on the consultation responses received.

## 7.6 Consideration by Executive Advisory Panel

7.6.1 The initial proposals were drafted following consideration and review by the Sustainable Communities Executive Advisory Panel on 26<sup>th</sup> April 2023 and the Prosperous Communities Executive Advisory Panel on 11<sup>th</sup> May 2023. Members of the panel were presented with the existing areas to be kept, information received from town and parish councils on a pre consultation process and areas mapped in Corby for consideration. The PSPO sent out for consultation reflected the considerations and comments discussed at these EAP meetings.

## 7.7 Consideration by Scrutiny

7.7.1 This report is eligible for call in by the Scrutiny Commission, as part of their work programme.

## 7.8 Equality Implications

7.8.1 An Equalities Screening Assessment was completed and is provided in **Appendix E**. The screening assessment shows in general a neutral impact, which is typical of an enforcement-based decision. There is also a positive impact noted on the potential improvement to our green spaces by increasing responsible dog ownership.

7.8.2 The PSPO will have no significant implications for Convention rights. All of the proposed new measures are accompanied with the appropriate rights of appeal. The most controversial measure is requiring dogs to be kept on a lead in a specific place and this is a requirement which balances the freedom for dog owners to walk their dogs off lead with the rights of consumers to enjoy freedom from unreasonable exposure to dogs not under proper control.

7.8.3 The PSPO will not apply to the owners of assistance dogs used by the blind or by those who are unable as a result of a disability to comply with the legislation.

7.8.4 The Kennel Club advised that they welcome the exemptions proposed in this Order for assistance dogs and urge councils to review the Equality and Human Rights Commission's guidance for businesses and service providers when providing any exemptions for those who rely on assistance dogs. The guidance of which can be viewed at:

<https://www.equalityhumanrights.com/sites/default/files/assistance-dogs-a-guide-for-all-businesses.pdf>

7.8.5 The Kennel Club however, suggested further consideration of the wording contained within the Order, specifically with reference to 'prescribed charity'. They advised that while a proportion of assistance dogs relied upon by disabled people are trained by charities, many are not. A number of reputable assistance dog providers are members of Assistance Dogs UK. This umbrella group currently has eight member organisations, which can be viewed here: <http://www.assistancedogs.org.uk/>. It is important to note that the membership

of Assistance Dogs UK is not a definitive list of all UK assistance dog organisations and may change during the currency of the PSPO. It also does not provide for owner trained assistance dogs.

- 7.8.6 The Kennel Club encourages the Council to allow for some flexibility when considering whether a disabled person's dog is acting as an assistance dog. They advised the Council could consider adopting the definitions of assistance dogs used by Mole Valley District Council, which can be found here:  
[https://www.molevalley.gov.uk/media/pdf/1/b/83072\\_-\\_Completed\\_PSPO.pdf](https://www.molevalley.gov.uk/media/pdf/1/b/83072_-_Completed_PSPO.pdf)

or that of Northumberland County Council:

“(4) The term “Assistance Dog” shall mean a dog which has been trained to assist a person with a disability.

(5) The expression “disability” shall have the meaning prescribed in section 6 of the Equality Act 2010 or as may be defined in any subsequent amendment or re-enactment of that legislation”.

- 7.8.7 The Council has considered the recommendations and advice provided by the Kennel Club and has transcribed this into the proposed PSPO.

## 7.9 **Climate and Environment Impact**

- 7.9.1 The enforcement of the new powers will lead to a safer and cleaner environment

- 7.9.2 There are no carbon emission or climate change implications with regard to this recommendation.

## 7.10 **Community Impact**

- 7.10.1 The PSPO places controls and restrictions across North Northamptonshire. For Kettering, Wellingborough and East Northants these restrictions and controls have been in place for a number of years and have been welcomed. The restrictions have been revised over the years to ensure new areas are included where evidence shows there is an issue, or to ensure better enforcement and clarity.

- 7.10.2 Key restrictions include dog exclusion in all fenced children's play areas, NNC-wide controls on dog fouling, 'dogs on lead' orders in places such as cemeteries and the ability to request dogs to be placed on leads when required. The PSPO process requires a high level of community engagement to ensure that the community impact is considered.

- 7.10.3 The overall aim of the PSPO is to make a positive impact on the community and the areas the public use. It must also take into account the controls proposed and the impact these will have on the community. The Council ensured in the drafting of the proposed PSPO that we sought as widely as possible comments, suggestions and views on the areas and requirements to be included.

## 7.11 Crime and Disorder Impact

- 7.11.1 Dog fouling is recognised as a rural crime indicator and repeatedly features as a major issue of concern for our residents. The use of these powers will have a positive impact on the Council's ability to challenge anti-social behaviour associated with irresponsible dog ownership.
- 7.11.2 The vast majority of dog owners are responsible, and the majority of dogs are well behaved. In recognition of this, the Council will also exercise its power to issue Community Protection Notices, targeting irresponsible owners and proactively addressing anti-social behaviours.

## 8 Background Papers

---

- 8.1 The Public Spaces Protection Order (Kettering Borough Council) (Dog Control) Order 2020. <https://kettering.gov.uk/downloads/download/13502/pspo-orders>
- 8.2 Borough Council of Wellingborough (Dog Control) Public Spaces Protection Order 2020. [https://wellingborough.gov.uk/info/98/anti\\_social\\_behaviour\\_and\\_nuisance/1458/public\\_spaces\\_protection\\_orders\\_-\\_2020](https://wellingborough.gov.uk/info/98/anti_social_behaviour_and_nuisance/1458/public_spaces_protection_orders_-_2020)
- 8.3 East Northamptonshire Council Public Spaces Protection Order 2020. [https://www.east-northamptonshire.gov.uk/info/100006/environmentalhealth/1924/public\\_spaces\\_protection\\_orders\\_east\\_northamptonshire\\_area](https://www.east-northamptonshire.gov.uk/info/100006/environmentalhealth/1924/public_spaces_protection_orders_east_northamptonshire_area)

**The Anti-Social Behaviour Crime and Policing Act 2014  
The Public Spaces Protection Order (North Northamptonshire Council) (Dog  
Control) Order 2023ic**

Notice is hereby given that North Northamptonshire Council (in this order called “the Authority”) hereby makes a Public Spaces Protection Order (PSPO) under Section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 (the Act) and all of the enabling powers:

**General Provisions**

1. The Order will be cited as the Public Spaces Protection Order (North Northamptonshire Council) (Dog Control) Order 2023 (“the Order”)
2. Unless otherwise provided, this order applies to all land in the administrative area of the Authority to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of any express or implied permission
3. The Order will come into effect on \*\* and shall remain in place for a period of 3 years unless extended by further order under the Council’s statutory powers.
4. A person who fails to comply with any obligation imposed by this order is guilty of an offence by virtue of section 67(1) of the Anti-Social Behaviour Crime and Policing Act 2014 and liable to a fine on summary conviction not exceeding level 3 on the standard scale.
5. If any interested person desires to question the validity of this Order on the grounds that the Council had no power to make it or that any requirement of the Act has not been complied with in relation to this Order, he or she may apply to the High Court within six weeks from the date on which this Order is made.

**6. Obligations on persons with dogs:**

If a dog defecates at any time on land to which this order applies, a person who is in charge of the dog at the time must remove the faeces from the land forthwith and dispose of it in an appropriate manner.

Unless:

- (a) they have reasonable excuse for failing to do so; or
- (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to their failing to do so (all areas of the Authority).

## **7. Lead by order**

A person in charge of a dog on land to which this order applies, must comply with a direction given to him or her by an authorised officer of the Authority to put and keep the dog on a lead unless:

- (a) they have reasonable excuse for failing to do so; or
- (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to their failing to do so.

An authorised officer may only give direction under this order if such restraint is reasonably necessary to prevent a nuisance or behaviour by the dog that is likely to cause annoyance or disturbance to any other person, or to a bird or another animal.

## **8. Leads**

A person in charge of a dog on land detailed in Schedule 1, must keep the dog on a lead of fixed length and of not more than 2 metres unless:

- (a) they have reasonable excuse for failing to do so; or
- (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to their failing to do so.

## **9. Exclusion**

A person in charge of a dog must not take it into or keep it within land detailed in Schedule 2 below unless:

- (a) they have reasonable excuse for doing so; or
- (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to their failing to do so.

## **10. Exemptions**

Nothing in this order shall apply to a person who:

- (a) is registered as a blind person in a register compiled under section 29 of the National Assistance Act 1948; or
- (b) a person with a disability affecting their mobility, manual dexterity or ability to lift, carry or move everyday objects and who relies upon an assistance dog.



**For the purpose of this order:**

- A person who habitually has a dog in his or her possession shall be taken to be in charge of the dog at any time, unless at that time some other person is in charge of the dog;
- Placing the faeces in a receptacle on the land, which is provided for the purpose, or for the disposal of waste, shall be sufficient removal from the land;
- Being unaware of the defecation (whether by reason of not being in the vicinity or otherwise), or not having a device for or other suitable means of removing the faeces, shall not constitute a reasonable excuse for failing to remove the faeces.
- “An authorised officer of the Authority” means an employee, partnership agency or contractor of North Northamptonshire Council who is authorised in writing by North Northamptonshire Council for the purposes of giving directions under the Order.
- In relation to the requirement for a dog to be on a lead, extendable leads are acceptable, but they must be locked at a length of 2 m or less.
- The term “Assistance Dog” shall mean a dog which has been trained to assist a person with a disability.
- The expression “disability” shall have the meaning prescribed in section 6 of the Equality Act 2010 or as may be defined in any subsequent amendment or re-enactment of that legislation.

## Schedule 1

1. This order applies to all land which is within the administrative area of North Northamptonshire Council and which is:

- (i) A highway, footway, cycleway or footpath maintainable at the public expense, any grass verge maintained by the local authority, and which is adjacent to any carriageway or footway of any highway, any road subject to a 30-mph limit or less to that part of the carriageway of a highway which forms part of the gutter.
- (ii) The following pedestrian and parking areas:
  - Tithe Barn and Croyland Hall, Tithe Barn Road, Wellingborough
  - Swanspool House, London Road, Wellingborough
  - The Castle Theatre, Castle Way, Wellingborough
  - Redwell Leisure Centre, Barnwell Road, Wellingborough
  - Waendel Swimming Pool, Cannon Street, Wellingborough
  - Swansgate Multi-storey carpark, Commercial Way, Wellingborough
  - High Street Car Park, Wellingborough
  - Embankment Car Park, Wellingborough
  - Car park on Palk Road/Knox Road, Wellingborough
  - Oundle Market Place
- (iii) The following parks, church yards and cemeteries, gardens, recreation land, playing fields etc
  - Special Protection Area Unit 2 Earls Barton West
  - Special Protection Area Unit 3 Summer Leys Nature Reserve and Wollaston Lakes
  - Special Protection Area Unit 4 Wellingborough Gravel Pits
  - Special Protection Area Unit 5 Ditchford East, Nene Wetlands
  - Special Protection Area Unit 6 Stanwick Lakes, Stanwick
  - Special Protection Area Unit 7 Kinewell Lake
  - Special Protection Area Unit 8 Thrapston and Titchmarsh Lakes
  - Hayes Wood Wildlife Refuge, Sywell Country Park
  
  - London Road Cemetery, Wellingborough
  - Doddington Road Cemetery, Wellingborough
  - Wollaston Cemetery, Cobbs Lane, Wollaston
  - Earls Barton Cemetery, Wellingborough Road, Earls Barton
  - Grendon St Mary's Church Cemetery, Grendon
  - All Hallows Churchyard, Wellingborough
  - Closed church yard attached to St Marys Church, Bozeat
  - Barnwell St Andrews Churchyard
  - Barnwell Chancel Churchyard
  - Brigstock Church Walk

- Irthlingborough Cemetery, Church Street
  - Irthlingborough Cemetery, Wellingborough Road
  - Oundle Cemetery and church yard
  - Thrapston St James Churchyard, Church Walk
  - Yarwell St Mary Magdelene Church
  - Yarwell Cemetery, Nassington Road, Yarwell
  - Burton Latimer cemeteries
  - Broughton cemetery
  - Kettering London Road cemetery
  - Pytchley cemetery
  - Rothwell cemetery
  - Kettering Rothwell Road cemetery
  - Cransley cemetery
  - Desborough cemetery
  - Saint Lawrence Church Yard, Stanwick
  - Stanwick Cemetery
  - Woodnewton Churchyard
  - Garden of Rest, Kettering
  - Parish Church Yard, gardens, Kettering
  - St Peters Church, Stanion
  - St John the Baptist Church, Church Walk, Corby
  - Oakley Park, Church Drive, Great Oakley
  - St Mary the Virgin, Church Street, Weldon
- 
- Swanspool Gardens, Wellingborough
  - Croyland Gardens, Wellingborough
  - Village Green, London Road, Bozeat
  - Finedon Bowling Green, Recreation Ground, Wellingborough Road, Finedon
  - Finedon Banks, Wellingborough Road, Finedon
  - Grendon Pocket Park, NN17 1JW
  - Ashton Village Green
  - Collyweston Playing field/pocket park, The Drift
  - Saffron Road Recreation Ground, Higham Ferrers
  - Islip Sports Field Toll Bar Road
  - Lowick Pocket park/play area
  - Nassington Village green and adjoining field
  - Oundle Occupation Road and surrounding sports areas
  - Rushden Hall Park
  - Thrapston The Peace Park, Huntingdon Road
  - Thrapston The Spinney, Warwick Gardens
  - Warmington Playing field
  - Warmington Warmington open space
  - Yarwell Allotments
  - Yarwell Playing field/football field
  - Yarwell Locks Green, Main Street

- Bassfords Recreation Ground and Millfields (Raunds) during council events
- Amos Lawrence Park, Raunds
- Manor Gardens, Kettering
- Market Place, gardens, Kettering
- Municipal Gardens, Kettering
- Broughton Playing Fields
- High Street Park, Broughton
- North Park (All Saints and Brambleside) during football matches
- Oakley Park, Church Drive, Great Oakley
- Green space, surrounding Great Oakley Cricket Ground
- Oakley Cricket Ground
- Greenspace off Harpers Close, Great Oakley
- Weldon Cricket Club, Weldon

## **Schedule 2**

1. This order applies to all land which is within the administrative area of North Northamptonshire Council, and which is:

- (i) A fenced/enclosed children’s play area and multi court signed at its entrance(s) as a “dog exclusion area” (whether the sign uses those particular words and/or symbols having like effect) which is designated and marked for children’s play
  
- (ii) Following playing fields, recreation grounds and cemeteries:
  - Bozeat Cemetery, Easton Lane Bozeat
  - Higham Ferrers Cemetery, Vine Hill Drive
  - Rushden Newton Road Cemetery
  
  - Playing field adjacent to Grendon CE School
  - Playing field Grendon Sapphires Youth Football Club, Yardley Road, Grendon
  - Playing field, Webb’s Lane, Sywell
  - The Embankment Splash Pool
  - Great Addington The Addington's Playing field
  - Islip Rec Ground, High Street
  - Stanwick Bowling green Stanwick Rec Ground
  - Meadow Road Park, Kettering

**Public Spaces Protection Order – Dog Control**  
**Open 22<sup>nd</sup> June 2023**  
**Close midnight, 3 August 2023**

## **Overview**

North Northamptonshire Council (NNC) currently has three separate Public Space Protection Orders (PSPO) relating to Dog Control covering the former legacy district and borough council areas of East Northamptonshire, Kettering and Wellingborough, each ending in November 2023. There is no PSPO relating to Dog Control in the area of Corby.

A PSPO allows the council to enforce key restrictions including dog exclusion in all fenced children's play areas, county wide controls on dog fouling, dogs on lead orders in places such as cemeteries and the ability to request dogs to be placed on leads when required.

NNC is seeking to review the content of the current PSPOs and incorporate the Corby area into one overall PSPO relating to Dog Control across North Northamptonshire.

Having one aligned PSPO in place for dog control, will bring all existing conditions and controls together in one place, will remove inconsistencies across the areas and make enforcement more straightforward and easier to understand for the public.

## **What are the main proposed changes?**

- Remove the requirement that dogs must be kept on a lead no more than 1.5m in length in prescribed areas – currently this is only within the Kettering area.
- Remove the restriction that a person may not take more than 6 dogs onto any land at any time – currently this is only within the Kettering area.
- Elements of the existing orders are replicated to cover the former Corby Borough Council area, including dog exclusion from all enclosed or fenced off children's play areas, dog fouling control and a requirement to have dogs on leads in certain areas such as churches and cemeteries.

A pre-consultation exercise has taken place with the Town and Parish Councils and key partners, and their feedback has been incorporated into the proposed draft PSPO.

## **Consultation dates**

The consultation for this PSPO will be made up of two phases. This is the first phase, which started Thursday 22 June and close midnight on Thursday 03 August 2023.

Following analysis of the consultation feedback a recommendations report will be made. This may change some of the contents of the draft PSPO.

A revised draft PSPO will be made, which will go out to consultation later this year. After this second phase of consultation the final proposed PSPO and any amendments will be presented to the council's Executive for formal sign off.

## Related Documents

Please see the following documents for further information, including the alternative options considered:

- [Public Spaces Protection Order – Dog Control 8 June 2023 Executive Report](#)
- [Draft Public Spaces Protection Order 2023 – Dog Control](#)
- [Dog Control PSPO FAQs](#)

## Have your say

Please tell us your views on the proposed draft PSPO Dog Control by completing this questionnaire.

Your feedback will be part of a report with many other people's feedback, so you will not be personally identified.

You can also access this online questionnaire free of charge at any North Northamptonshire Council library. Please see the [Library website](#) or telephone 0300 126 3000 to check opening times.

If you have any queries, comments or would like a copy of this questionnaire in another format (including paper, easy read or large print) you can contact us by email, post or telephone. Our contact details are as follows:

Email address: [envprotection@northnorthants.gov.uk](mailto:envprotection@northnorthants.gov.uk)

Telephone: 0300 126 3000

Postal address:

North Northamptonshire Council  
Environmental Protection  
Swanspool House  
Doddington Road  
Wellingborough  
Northants  
NN8 1BP

The deadline for completing this questionnaire is midnight Thursday, 03 August 2023.

**Thank you for helping us by completing this questionnaire.**

For information about how consultation and engagement responses are managed, please see the [consultation and engagement privacy notice](#).

## SURVEY

### About You

In what capacity are you responding to this questionnaire?

- A resident of North Northamptonshire
- A North Northamptonshire Council Councillor
- A Town or Parish Councillor
- A representative of a Town/Parish Council
- Other (please give details below)

Other:

Please tell us your postcode. By providing us with your postcode, you are consenting for us to use this information to understand where respondents live. If you do not consent to us using this information in this way, please do not provide your postcode.

Are you a dog owner:

- Yes
- No

### PSPO Harmonisation

In order to ensure consistency across North Northamptonshire a new PSPO for dog control is proposed for the authority. The draft proposed order can be found in [Appendix A of the 8 June Executive report](#). The order includes all areas previously covered by dog control PSPOs and makes proposals for inclusion of areas following initial consultation with Town and Parish Councils. The former Corby Borough Council area currently has no PSPO for dog control and the council will review consultation responses to determine areas for inclusion in Schedule 1 (dogs on leads) and Schedule 2 (dog exclusion) of the proposed Order.

Having one aligned PSPO in place for dog control, will bring all existing conditions and controls together in one place, will remove inconsistencies across the areas and make enforcement more straightforward and easier to understand for the public.

To what extent do you agree or disagree that there should be one PSPO for dog control for North Northamptonshire?

- Strongly agree

- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

If you would like to tell us why you answered in this way, you can do so here.

### **Part 1: Dog Fouling**

**Proposals for the North Northamptonshire area are that it is an offence for an owner not to remove dog waste anywhere that the public can access and is open air. The Corby area has been added to the scope.**

To what extent do you agree or disagree with NNC's proposal concerning dog fouling (anywhere that the public have access to and is open to the air, it is an offence for an owner to not remove dog waste)?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

If you would like to tell us why you answered in this way, you can do so here.

If there are any specific areas within North Northamptonshire that you think have had an issue with dog fouling, please confirm where they are and what action you would like us to take.



**Part 2: Dog Exclusion Zones**

**Proposals for the North Northamptonshire area are that dogs are excluded from restricted areas of land as outlined in Schedule 2 of the draft PSPO.**

To what extent do you agree or disagree with NNC’s proposal of restricting the access of dogs to certain areas, such as fenced children’s play areas and certain cemeteries?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don’t know

If you would like to tell us why you answered in this way, you can do so here.

If there are any areas within North Northamptonshire that you think would benefit from having a dog exclusion zone enforced please confirm where they are and what action you would like us to take.

If there are any current exclusion zones in place that you think need reassessing due to a change in circumstance please confirm where they are and any reasons you would like to share

**Part 3: Dogs on Leads**

**Proposals for the North Northamptonshire area are that dogs are required to be on a lead in areas of land as outlined in Schedule 1 of the draft PSPO.**

To what extent do you agree or disagree with NNC's proposal of restricting certain areas of land so that a dog must be walked on a lead at all times?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

If you would like to tell us why you answered in this way, you can do so here.

If there are any areas within North Northamptonshire that you feel would benefit from having dogs on lead requirements in place please confirm where they are and any reasons you would like to share.

If there are any current dogs on lead orders in place that you believe need reassessing due to a change of circumstance please confirm where they are, what the change is and any reasons you would like to share.

To what extent do you agree or disagree with NNC's proposal to remove the requirement from the former Kettering Borough Council PSPO that dogs must be kept on a lead no more than 1.5 metres in length in prescribed areas, as it is not deemed necessary or practical to enforce?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

If you would like to tell us why you answered in this way, you can do so here.

#### **Part 4: Restrictions on the Number of Dogs**

**We are proposing to remove the requirement from the former Kettering Borough Council PSPO that a person in charge of a dog must not take more than 6 dogs onto any land at any time.**

**It is understood the Department for Environment, Food & Rural Affairs (DEFRA) is currently reviewing issues around dog walkers and the numbers of dogs that they can safely walk. We feel it would not be appropriate to implement new requirements that may be contradictory to any new proposals and will review the outcome of DEFRA's review.**

To what extent do you agree or disagree with NNC's proposal to remove the requirement from the former Kettering Borough Council PSPO that restricts the number of dogs allowed to be walked by a single person to no more than six?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

If you would like to tell us why you answered in this way, you can do so here.

#### **Part 5: Dogs on Leads by Direction**

**Proposals for the requirement that any person in charge of a dog must comply with a direction given to them by an authorised officer of NNC to put and keep their dog on a lead.**

To what extent do you agree or disagree with NNC's proposal that an authorised officer can direct that a dog be placed upon a lead. This would mean that any authorised officer of the council can require a dog owner to put the dog on a lead. This may be following complaints of issues in the locality or during patrols where a dog(s) is identified as not being under control.

- Strongly agree
- Tend to agree
- Neither agree nor disagree

- Tend to disagree
- Strongly disagree
- Don't know

If you would like to tell us why you answered in this way, you can do so here.

If you have any other comments you would like to make that you have not already told us, then please tell us here:

Table with 15 columns: Section, Item No., Item Description, Agency Name, Agency Address, Agency Phone, Agency Fax, Agency Email, Agency Website, Agency Status, Agency Type, Agency Category, Agency Sub-category, Agency Sub-sub-category, Agency Sub-sub-sub-category.



| What is your postcode? By providing us with your postcode, you are consenting for us to use this information to understand where respondents live. If you do not consent to us using this information in this way, please do not provide your postcode. - Postcode | To what extent do you agree or disagree with the contents of the proposed PSPO? - Extent of agreement or disagreement | If there is anything else that you wish to share regarding the draft PSPO order you can do so here. - Anything else you wish to share?  |
|--|---|---|
| NN17   | Disagree  | Exclusions are harsh. If a dog is on a short lead and any mess is cleared up, what harm does it do?Please note that not all assistance dogs are trained by a prescribed charity. There are assistance dogs that are owner trained, or trained by other skilled trainer but are still very much needed for support                       |
| NN18 8JL   | Neither agree nor disagree  |   |
| nn18 8gx   | Strongly agree  | Why isnt Corby covered under this PSPO  |
| NN96RF   | Agree   | I think clear signage would be needed for all exits and entrances which I believe will be difficult to achieve (people just vandalise and put signs down). I also feel it will be extremely difficult to police these PSPO orders. Who is going to appraise someone in a park who should have their dog on the lead but chooses not to? |
| NN9 6PJ  | Agree   |   |
| Nn9  | Agree   | Dogs should not be restricted on Public land I do feel the number of dogs walked by one person should be limited to 4 to stop dog attacks and pack mentality Some dog walkers walk up to 9 and being a dog owner I am intimidated by that many dog being 'controlled' by one person   |
| NN9 6DG  | Strongly agree  |   |
| Nn8 3nh  | Agree   |   |
| NN10 8AA   | Agree   |   |
| NN15 5BX   | Strongly agree  |   |
| NN15 5PY   | Strongly agree  | Any dog that bites a person or attacks another dog should in the first instance not be allowed off the owners premises unless muzzled, and if taken out without a muzzle and it attacks a person or other dog it should be immediately euthanised   |
| NN9 6DE  | I'm not sure  | The page would not open up and I cannot give me true opinions but would like to say a few things of my experiences of public land. I am frustrated in the dog fouling situation. I called the dog warden several times she came round to my house several times I gave her the evidence photos and videos. She can't do anything!       |
| NN109XY  | Strongly agree  | Length of dog leads should be shorter and "extending" dog leads banned in public places. They are very dangerous for people with limited vision as they blend into the background and cannot be easily seen. I know of people who have fallen over because of them.I agree that dog "poo" bags must be disposed of properly             |
| NN14 2FE   | Agree   | To produce a bag or means to pick up dog waste upon request if exercising a dog upon request of an authorised council officer / police officer or PCSO  |
| NN10 9YN   | Strongly agree  | There is nothing else to declare as I totally agree with the PSPO proposal  |
| NN156FS  | Strongly agree  | I think, in my area more dogs poo bins would be needed.   |
| NN14 4DF   | Agree   | The prolific leads of not more than 2 metres is unnecessary. This would mean the owner may have to change leads just to comply, rather than just shortening an extendable lead to the required length.  |
| nn156dy  | Agree   |   |
| NN14 1LN   | Strongly agree  | The PSPO should v=cover the whole area of North Northants   |
| pe8 5hz  | Neither agree nor disagree  | 2m lead restriction and wording re extendable leads is a bit vague. Have you considered the standard length of extendable leads? Hard to see people walking around with tape measures to check they are less than 2m.   |
| NN8 1hj  | Strongly agree  |   |
| NN189DF  | Disagree  | Is someone trying to justify their weekly wage? A pointless waste of time and Council resources could be put to far better use.   |
| NN95XW   | Strongly agree  | Educate peoples responsibility of ownership of a DOG.License them all.  |
|  | Agree   |   |
| NN14 4UF   | Agree   | There have been several incidences of dogs wandering around in this area. Is there any way these dogs can be taken to a safe place while the owners are identified? Is there a dedicated unit/organisation? I seem to recall something should be in place.  |
| Nn48fq   | I'm not sure  | Dogs should be licensed and microchipped.   |
| NN8 3LS  | Strongly agree  |   |
| NN18 9FD   | Neither agree nor disagree  | Why is there no mention of spaces in Corby  |
| NN15 5HW   | Strongly agree  | Dogs should not be allowed into any premises selling or serving food  |
| Nn15 6ng   | Strongly agree  |   |
| NN10 8EX   | Agree   | Wharf Rd Higham Ferrers SSS site should be included in the List!!!!!!Severe problems there with Dog Excrement & dogs running loose  |
| NN10 6UG   | Agree   |   |
| NN8 5AF  | Strongly agree  | I couldn't see an exclusion proposal for Glamis Woods & I presume the playing areas on Kilborn Road come under Playgrounds generally. My other concern is how is this to be enforced - at the moment the Council doesn't have any cash.   |
| NN15 6LB   | Disagree  | I disagree because:1. There are many area's that should NOT have been left out of the PSPO dog order (in my opinion) within KETTERING e.g.Horse MarketKettering Market PlaceRockingham Road Pleasure Park (main park & dog play area) (schedule 1) AND children's play area (schedule 2)Highfield Road parkMeadow R                     |
| NN144LA  | Strongly agree  |   |
| Nn108el  | Strongly agree  | We must Have Higham Ferrers The Wharf ssi site on this list as we have a massive problem with dog excrement and loose dogs off the lead !!  |
| Nn10 Opp   | Strongly agree  | This is only of any real value if enforced. I have witnessed regular infringements at both Hall Park and Stanwick lakes. The latter I wrote to a number of weeks ago, idiot even receive an acknowledgement.  |
|  | Strongly disagree   | focus on other important things like getting more bin cleaners on the street in rushden   |
|  | Disagree  |   |
| NN9 5TU  | Strongly agree  | Wollaston Parish Council would like Wollaston Playing Fields, London Road, Wollaston to be added to Schedule 1 (iii). Dog fouling/off lead dogs is a huge problem on the Playing Field for both humans and other animals. I was under the understanding the previous Clerk of Wollaston Parish Council requested this in A              |
| NN29 7QQ   | Agree   |   |
| NN10 8PE   | Strongly agree  |   |
| NN18 9AX   | Strongly agree  | Knowing that it didnt cover Corby before why has this now not been included in the new draft. why is there no limit added for number of dogs per person can walk included - when checking for guidance on gov.uk it directs you to local council but we have nothing  |
| NN8 2JG  | Agree   | I would strongly agree if Stanwick Lakes was not included, although the area around the playgrounds, and main hub should be included. Irchester Country Park is divided into the main hub which is included and other areas which are not. Stanwick Lakes is large enough to allow for dogs off leads which is the only part            |
| pe8 6xt  | Agree   | Croyland Gardens, Wellingborough is listed twice.I would like to see Kings Cliffe churchyard and Active at Kings Cliffe included. Is there a reason why they are not?   |
| Nn9 5pr  | Agree   |   |
| Nn9 5pr  | Agree   |   |
| NN8 4UY  | Strongly agree  |   |
| NN14 4BW   | Strongly agree  |   |
| NN14 4BU   | Strongly agree  | Include in Schedule 1. 1(iiii) Great Addington, All Saints Church, Churchyard   |
| NN6 OAX  | Strongly agree  | I have noticed that Sywell and Irchester Country parks are listed but not Fermyn Woods or Barnwell Country Park. Is there any reason for this?  |
| NN14 1PX   | Disagree  | I am concerned that it does not mention bridleways specifically.Also most fouling on my land is done by dogs that leave the footpath and are not "under control" and the owners make no attempt to collect it.Somewhat the order needs to enforce clause 2 at the start.....the schedule does not seem to reinforce this point          |
| NN14 2NP   | Strongly agree  | Would like to know how it would be enforced.  |
| nn6 9ad  | Agree   | no  |
|  | Strongly agree  |   |
| NN8 3JP  | Agree   | I notice that Bassetts Park is not mentioned in the order. There is a fenced area that school children from Freemans and St Barnabas School use for sports there is a small sign stating that dogs are excluded however this is largely disregarded by owners who go into the area and immediately let their pets off the lead          |
| NN17 2AN   | Strongly agree  |   |
| NN14 4XL   | Neither agree nor disagree  |   |
| NN169RS  | Agree   | Please make sure there is current, ample, and clear signage in plenty of places.  |
| NN14 2PS   | Agree   |   |
| NN108NL  | Strongly agree  | I would like to see that Dog owners are not allowed to take many dogs to a park or area off lead. These dogs can act like a pack and can be uncontrollable. Therefore, there should be a restriction of how many dogs an owner has off lead. Although i realise that this consultation does not cover this.                             |
| NN156HB  | Strongly disagree   | I believe that dogs should be allowed to run free where safe an appropriate to do so.Restricting a dog to a 2m lease does not adequately exercise some breeds or temperaments of dogs within the length of a walk that the owner can offer depending on disability or other factors, time constraints etc.I consider it appropriate     |
| Nn9 5sw  | Neither agree nor disagree  |   |
| NN142NT  | Agree   |   |
|  | Not Answered  |   |
| NN965B   | Agree   |   |
| Nn14 2th   | Agree   |   |
| Nn100jb  | Neither agree nor disagree  |   |
| nn154af  | Neither agree nor disagree  |   |
|  | Not Answered  |   |
| Nn144bl  | Not Answered  |   |

This page is intentionally left blank





## Equality Screening Assessment

The Equality Screening Assessment form must be completed to evidence what impact the proposal may have on equality groups within our community or workforce. Any proposal that identifies a negative impact must have a full Equality Impact Assessment completed before the proposal progresses further.

### 1: Proposal

| Requirement  | Detail   |
|--|--|
| Title of proposal  | North Northants Public Space Protection Order for Dog Control  |
| Type of proposal: new policy / change to policy / new service / change to service / removal of service / project / event/ budget | New North Northants Order to replace three existing orders   |
| What is the objective of this proposal?  | <p>Harmonisation of 3 existing PSPO's into one NNC wide order with the introduction of the former sovereign area of Corby.</p> <ul style="list-style-type: none"> <li>Public Space Protection Orders (PSPO's) are already in place for Dog Control in the former sovereign areas of East Northants, Wellingborough and Kettering.</li> <li>PSPO's require reviewing every 3 years, the current PSPO's in place will expire in 2023.</li> </ul> |

| Requirement  | Detail  |
|--|---|
| <p>Has there been/when will there be consultation on this proposal?<br/>(List all the groups / communities, including dates)</p>   | <p>To renew a PSPO a public consultation is required, and a 2-stage consultation process has been conducted.</p> <p>First stage consultation commenced on 22.06.23 and ended 03.08.23</p> <p>Second stage consultation commenced on 31.08.23 and ended on 28.09.23.</p> <p>Consultees included:</p> <ul style="list-style-type: none"> <li>• Public consultation via open access online survey and council social media accounts.</li> <li>• Councillors</li> <li>• Council Officers</li> <li>• Town and Parish Councils</li> <li>• Internal Equalities Team</li> <li>• Northamptonshire Office of Police and Crime Commissioner</li> <li>• Northamptonshire Police</li> <li>• Members of the Public</li> <li>• Local press and media channels</li> <li>• Specified stakeholders in relation to Dog Control e.g., Kennel Club, RSPCA and Dogs Trust.</li> </ul> |
| <p>Did the consultation on this proposal highlight any positive or negative impact on protected groups? (If yes, give details)</p> | <p>Corporate equality monitoring questions were utilised for the consultation and engagement activities.</p> <p>There were no equality monitoring forms completed by respondents as part of this process.</p> <p>Advice was taken from the Kennel Club to review the Equality and Human Rights Commission's guidance for businesses and service provider when providing any exemptions for those who rely on assistance dogs.</p>   |

| Requirement   | Detail  |
|---|---|
|   | <p>The Kennel Club suggested further consideration of the wording contained within the Order, specifically with reference to ‘prescribed charity’. They advised that while a proportion of assistance dogs relied upon by disabled people are trained by charities, many are not. A number of reputable assistance dog providers are members of Assistance Dogs UK. This umbrella group currently has eight member organisations, which can be viewed here: <a href="http://www.assistedogs.org.uk/">http://www.assistedogs.org.uk/</a>. It is important to note that the membership of Assistance Dogs UK is not a definitive list of all UK assistance dog organisations and may change during the currency of the PSPO. It also does not provide for owner trained assistance dogs.</p> <p>The Kennel Club also recommended that the Council allowed for some flexibility when considering whether a disabled person’s dog is acting as an assistance dog.</p> |
| <p>What processes are in place to monitor and review the impact of this proposal?</p> | <p>The implementation of the PSPO can be challenged by any interested person within 6 weeks of the making of the Order, the challenge is made at the High Court. Anyone who is directly affected by the making of the PSPO can challenge the order.</p> <p>All cases will be treated on an individual basis, and any decisions reached will be within existing legislative guidelines, taking into account any equality considerations. Use of the PSPO powers and advice given will be recorded in pocket notebooks and on ECIN’s database (shared case management system). The information will be analysed to determine whether the implementation of the powers has a disproportionate effect upon the equality factors.</p> <p>Enforcement will always be seen as a last resort. Through the multi-agency groups and individual case management, support and intervention will continue to be offered.</p>   |
| <p>Who will approve this proposal?<br/>(Committee, CLT)</p>                           | <p>Executive</p>  |

## 2: Equality Consideration

In turn, consider each protected group to ensure we meet our legal obligations of the Equality Act (2010).

| Protected Groups   | General Equality Duty Considerations  | Changes  | Impact  |
|--|---|--|---------|
| <b>Age</b><br>Different age groups that may be affected by the proposal in different ways.   | Children may not understand the requirements within the order.  | Where applicable, parent/guardians of under 16's will be spoken to in line with the council's enforcement policy and procedures before any action is taken.  | Neutral |
| <b>Sex</b><br>Is one sex affected more than another or are they affected the same?           | There is no evidence that the Order will impact on any specific person based on their gender.   | N/A  | Neutral |
| <b>Disability</b><br>It is likely to have an effect on a particular type of disability. Why? | <p>People with cognitive impairments or learning disabilities may have difficulty processing the requirements of the order.</p> <p>There would be a benefit for a person who has an assistance dog to understand the requirements and be confident that they are compliant.</p> | <p>The PSPO for dog control is not applicable to registered guide/assistance dogs.</p> <p>Any disabilities will be taken into consideration by the enforcement officer in accordance with the council's enforcement policies and procedures, before a decision is taken on appropriate enforcement action. This includes consideration of any disability, ensuring that there will be no negative equalities impact.</p> <p>The order will be written in accordance with the writing inclusion guidance and appropriate support will be provided where required.</p> | Neutral |


| Protected Groups   | General Equality Duty Considerations   | Changes | Impact  |
|--|--|---------|---------|
| <b>Gender Reassignment</b><br>Will there be an impact on trans males and/or trans females?   | There is no evidence that the Order will impact on any specific person based on their gender reassignment. |         | Neutral |
| <b>Race</b><br>Are people from one ethnic group affected more than people from another ethnic group?                                   | There is no evidence that the Order will impact on any specific person based on their race.                |         | Neutral |
| <b>Sexual Orientation</b><br>Are people of one sexual orientation affected differently to people of another sexual orientation?        | There is no evidence that the Order will impact on any specific person based on their sexual orientation.  | N/A     | Neutral |
| <b>Marriage &amp; Civil Partnership</b><br>Are people in a Marriage or Civil Partnership treated less favourably?                      | There is no evidence that the Order will impact on any specific person based on their marital status.      | N/A     | Neutral |
| <b>Pregnancy &amp; Maternity</b><br>Are people who are pregnant, or have a baby of 6 months old or younger, effected by this proposal? | There is no evidence that the Order will impact on any specific person based on pregnancy or maternity.    | N/A     | Neutral |
| <b>Religion or Belief</b><br>Does the proposal effect people differently depending on whether they                                     | There is no evidence that the Order will impact on any specific person based on their beliefs or religion. | N/A     | Neutral |

|   |  |   |  |
|---|--|---|--|
| <p><b>Protected Groups</b></p>  | <p><b>General Equality Duty Considerations</b></p> <ul style="list-style-type: none"> <li>• Include factual evidence of how people in this group may be affected.</li> <li>• Consider the outcomes and processes.</li> <li>• Does this seek to <b>eliminate discrimination</b>?</li> <li>• Does this promote <b>fostering good relations</b>?</li> </ul>                         | <p><b>Changes</b></p> <ul style="list-style-type: none"> <li>• What changes can be made to mitigate any negative impact?</li> <li>• Are there opportunities to <b>remove possible barriers or disadvantages</b> that a group may face?</li> </ul> | <p><b>Impact</b></p> <p>Delete as appropriate.</p> <p>There can be more than one answer per protected group.</p> |
| <p>have or do not have a religion or a belief?</p>  |  |   |  |
| <p><b>Health &amp; Wellbeing</b></p> <ol style="list-style-type: none"> <li>1. Health behaviours (E.g., diet, exercise, alcohol, smoking)</li> <li>2. Support (E.g., community cohesion, rural isolation)</li> <li>3. Socio economic (E.g., income, education).</li> <li>4. Environment (E.g., green spaces, fuel poverty, housing standards).</li> </ol> | <p>There is no evidence that the Order will impact on any specific person and their health and wellbeing. However, people who may feel unable to venture out (especially with the issues around some breeds at the moment) may feel more confident to do so, this will have a positive impact on their health and well-being. It will (prevent them from becoming isolated).</p> | <p>N/A</p>  | <p>Neutral</p>   |

### 3: Equality Impact

| Question   | Response       |
|--|----------------|
| <p>What overall impact does the proposal have on the protected groups?<br/>If a negative impact is identified anywhere in section 2, the response will be Negative Impact.</p> | <p>Neutral</p> |
| <p>Does an Equality Impact Assessment need to be completed?<br/>(Yes, if any negative impact is found.)</p>  | <p>No</p>      |
| <p>Copy attached to relevant report?</p>   | <p>Yes</p>     |
| <p>Is this document going to be published with the relevant report?</p>  | <p>Yes</p>     |

#### 4: Ownership

| Question                       | Response   |
|--------------------------------|--|
| Directorate                    | Regulatory Services  |
| Service area                   | Environmental Health   |
| Lead officer's name            | Catherine Clooney  |
| Lead officer's job title       | Environmental Protection Manager   |
| Lead officer's contact details | 01933 231960<br>Catherine.clooney@northnorthants.gov.uk                            |
| Lead officer's signature       |  |
| Date completed                 | 13.10.23   |

Completed forms must be sent to [Equalities@northnorthants.gov.uk](mailto:Equalities@northnorthants.gov.uk)

This page is intentionally left blank



## EXECUTIVE 16<sup>th</sup> November 2023

|                      |   |
|----------------------|---|
| <b>Report Title</b>  | <b>Northamptonshire Safeguarding Adults Board (NSAB) Annual Report 2022-2023</b>  |
| <b>Report Author</b> | David Watts, Executive Director of Adults, Health Partnerships and Housing (DASS) & Children's Services (Interim DCS)<br><br>Suzanne Binley, Business Manager, Northamptonshire Safeguarding Adults Board |
| <b>Lead Member</b>   | Councillor Helen Harrison, Executive Member for Adults, Health and Wellbeing  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

#### **Appendix A – Northamptonshire Safeguarding Adults Board Annual Report 2022 - 2023**

#### **1. Purpose of Report**

---

- 1.1 To present to the Executive the Northamptonshire Safeguarding Adults Board (NSAB) Annual Report 2022-2023. The report outlines the Board and statutory partner achievements against the strategic plan during the year.

#### **2. Executive Summary**

---

- 2.1. Under section 43 of the Care Act 2014, every local authority must establish a Safeguarding Adults Board (SAB) for its area. The objective of a SAB is to help

and protect adults in its area and assure itself that local safeguarding arrangements and partners act to help and protect adults in its area.

Under section 14.136 of the Care and Support Statutory Guidance, a SAB has 3 core duties:

- It must publish a strategic plan for each financial year that sets how it will meet its main objectives and what members will do to achieve this.
- It must publish an annual report detailing what the SAB has done during the year to achieve its main objectives and implement its strategic plan.
- It must conduct any safeguarding adults reviews in accordance with Section 44 of the Act.

2.2. The NSAB Annual Report 2022-2023 provides an overview of the Board's progress and achievements against the NSAB Strategic Plan for the period 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023. The progress made against the plan is detailed via the achievements of the NSAB Sub Groups, work of the Delivery Board and Strategic Board.

### **3. Recommendations**

---

3.1. It is recommended that the Executive:

- i) Note the NSAB Annual Report 2022-2023 as approved by the NSAB Strategic Board on 5<sup>th</sup> October 2023 at **Appendix A**.
- ii) Acknowledge the contribution that North Northamptonshire Council has made in supporting NSAB's achievements in keeping adults safe from harm.

3.2. Reason for Recommendations – The report provides assurance to the Executive of the activities undertaken to help safeguard adults across North Northamptonshire.

3.3. Alternative Options Considered – As the Director of Adult Social Services (DASS) and Children's Services (Interim DCS) has already approved the report, that the report not be presented for consideration by the Executive. This is not recommended for the reasons set out at paragraph 3.2.

### **4. Report Background**

---

4.1. The report has been developed including contributions from the four statutory partners and was reviewed and approved by NSAB's Strategic Board on 5<sup>th</sup> October 2023.

4.2. The Care Act 2014 places Safeguarding Adult Boards on a statutory footing with a requirement to produce and publicise an annual report.

- 4.3. This is the third annual report received by North Northamptonshire Council.
- 4.4. The report highlights the progress and achievements made during the period, and also advises the future developments for the Council for the year ahead to safeguard adults in the North Northamptonshire area.
- 4.5. The format of the report aligns with the NSAB Strategic Plan, and includes quantitative and qualitative evidence, key messages, and impact of activities that relate to:
  - (a) Raising community awareness of how to report a safeguarding concern via the #ReportIt Campaign and translation of materials.
  - (b) Activity and engagement on the NSAB website and social media account.
  - (c) Providing multi-agency training opportunities for frontline workers via the weeks of learning.
  - (d) Continued development of the NSAB dashboard to provide analysis of safeguarding data to understand the reasons for safeguarding concerns, and to use the information to inform the strategic plan and operational arrangements including adults' desired outcomes (Making Safeguarding Personal).
  - (e) Under section 44 of the Care Act 2014, undertake Safeguarding Adult Reviews when an adult in its area dies as a result of abuse or neglect, whether known or suspected, and there is concern that partner agencies could have worked more effectively to protect the adult.
  - (f) Working in partnership with local authorities and local Healthwatch to understand adults' experience of the s42 safeguarding process (in progress).
  - (g) Review how well agencies are working together to effectively safeguard adults at risk of harm and abuse via audit activities including self-assessment, multi-agency and single agency audits.
  - (h) Providing scrutiny and challenge regarding the effectiveness of safeguarding arrangements across the partnership.

## **5. Issues and Choices**

---

- 5.1 The report has been developed via contributions from statutory partners and has been reviewed and approved by NSAB's Strategic Board.

## **6. Next Steps**

---

- 6.1 Once received by both local authorities in Northamptonshire, the statutory annual report will be published by Northamptonshire Safeguarding Adult Board on the [NSAB website](#).

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

7.1.1. There are no financial implications arising from the presentation of the report at this time.

### **7.2. Legal and Governance**

7.2.1. It is a legal requirement under The Care Act 2014 for Safeguarding Adults Boards to publish an Annual Report.

### **7.3. Relevant Policies and Plans**

7.3.1. See Northamptonshire Safeguarding Adults Board Strategic Plan 2021 – 2023.

### **7.4. Risk**

7.4.1. Under the Care Act 2014, the Local Authority has a duty to establish a Safeguarding Adults Board (SAB), which in turn must publish an annual report. In order to mitigate risk, the report is designed to highlight achievements for the year and the future priorities for the statutory partners. Monitoring of progress enables early action to be taken where there are areas of significant risk or failure to deliver.

### **7.5. Consultation**

7.5.1. There has been no public consultation in respect of the NSAB Annual Report 2022-2023, but an approval process has taken place, as detailed below:

- Statutory Partners provided their input in respect of their achievements for period along with their areas for improvement for 2023-2024.
- The draft Annual Report 2022-2023 was approved by NSAB Strategic Board members on Thursday 5<sup>th</sup> October 2023. Members include senior officers from the two local authorities, the Integrated Care Board, and Northamptonshire Police.

### **7.6. Consideration by Executive Advisory Panel**

7.6.1. The report has not been considered by an Executive Advisory Panel.

### **7.7. Consideration by Scrutiny**

7.7.1. The report has not been considered by the Council's Scrutiny function.

## **7.8. Equality Implications**

7.8.1. An Equality Screening Assessment was completed to evidence the impact the NSAB Annual Report 2022-2023 may have on equality groups within the community. Results concluded that the Annual Report has no impact on the protected groups.

7.8.2. The Annual Report will be made accessible and will be published on the NSAB website for individuals to access. As the document is accessible this means that individuals can use Dragan NaturallySpeaking technology (or similar) in order to read the document.

7.8.3. The Annual Report can be requested in alternative formats or alternative languages by contacting the NSAB Business Office.

## **7.9. Climate and Environment Impact**

7.9.1. There is no climate/environmental impact arising from the NSAB Annual Report 2022-23 as it is shared on the NSAB website, and not printed.

## **7.10. Community Impact**

7.10.1. There is no distinct community impact arising from the Annual Report.

## **7.11. Crime and Disorder Impact**

7.11.1. There are no crime and disorder implications arising from the NSAB Annual Report 2022-2023.

## **8. Background Papers**

---

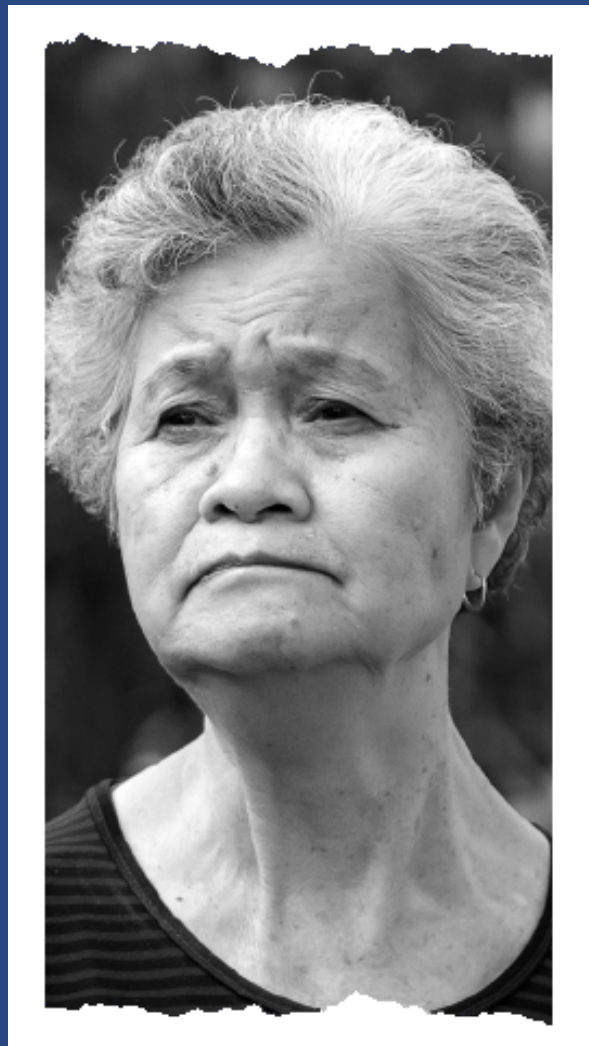
8.1 The Care Act 2014 – [Care Act 2014 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

8.2 Northamptonshire Safeguarding Adults Board Strategic Plan 2021 – 2023

8.3 NSAB Annual Report Equality Screening Assessment

This page is intentionally left blank

# Northamptonshire Safeguarding Adults Board



## Annual Report 2022-2023

[www.Northamptonshiresab.org.uk](http://www.Northamptonshiresab.org.uk)

[NSAB.ncc@westnorthants.gov.uk](mailto:NSAB.ncc@westnorthants.gov.uk)

[www.Twitter.com/NorthantsSAB](https://www.Twitter.com/NorthantsSAB)

# Contents

|   | Page |
|---|------|
| Northamptonshire Safeguarding Adults Board                      | 2    |
| Message from the Chair, David Watts                             | 3    |
| Report Overview   | 4    |
| Report from the Independent Scrutineer, Jane Geraghty           | 5    |
| Progress and Achievements during 2022-2023                      | 6    |
| Safeguarding Adult Reviews (SARs)                               | 15   |
| Working in Partnership - our Key Statutory Partners             | 17   |
| Safeguarding Return Statistics – North Northamptonshire Council | 23   |
| Safeguarding Return Statistics – West Northamptonshire Council  | 24   |
| Progress against the 2021-2023 Strategic Plan                   | 25   |
| Income and Expenditure  | 26   |

## Northamptonshire Safeguarding Adults Board

In accordance with the Care Act 2014, it is a statutory requirement for Local Authorities to establish a Safeguarding Adults Board in its area.

The purpose of the Safeguarding Adults Board (SAB) is to assure itself that local safeguarding arrangements are in place, and partners act to protect the welfare of adults who have care and support needs, and who may be at greater risk of abuse and neglect. The Board is committed to preventing abuse from happening, and that safeguarding practice continues to improve outcomes for people in Northamptonshire.

Safeguarding Adults Boards have three core duties under the Care Act 2014:

1. Publish a strategic plan for each financial year and its strategy for achieving its objectives.
2. Publish an annual report including what has been achieved during the year, what it has done to implement the strategy, what members have achieved and findings of reviews.
3. Conduct Safeguarding Adults Reviews in accordance with Section 44 of the Care Act.

Northamptonshire Safeguarding Adults Board (NSAB) is made up of senior officers nominated by partner agencies such as the statutory partners: North and West Northamptonshire Councils, Northamptonshire Police, and NHS Northamptonshire Integrated Care Board. Other members include: Acute Hospitals (Kettering General Hospital and Northampton General Hospital), Department of Work & Pensions, Healthwatch North & West Northamptonshire, HM Prisons, Northamptonshire Fire & Rescue Service, Northamptonshire Healthcare NHS Foundation Trust, National Probation Service Northamptonshire, Public Health, and organisations in the Voluntary and Community Sector.

Members have delegated authority to represent their organisation and to make decisions on their agency's behalf.

### NSAB's Vision

*'Working together to keep people safe'*

During the period 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023, NSAB was supported by the operational Delivery Board and four Sub Groups - Communications & Engagement, Learning & Development, Quality & Performance, and Safeguarding Adult Review, as well as a number of dedicated task and finish groups to further support activities from the groups.

There were no new declarations of interest received by members during the year.



## Foreword from David Watts

### Chair, Northamptonshire Safeguarding Adults Board

I am pleased to be able to present the annual report for the first year in my role as Chair of Northamptonshire Safeguarding Adults Board (NSAB). As in previous years, this annual report provides more detailed information on the work undertaken throughout 2022-23, including the achievements of the Delivery Board and Sub Groups, Safeguarding Adult Reviews and the work of the statutory partners.

The last year has been one where we, as a society, have talked much about “recovery” after the pandemic was controlled sufficiently for us to return to doing the things we did before. However, that is not always easy, the world does not stand still. The country has experienced the impacts of international crisis’ that have the potential to bring different safeguarding challenges to those we may have experienced before.

Collectively, we have played an important part in opening our homes and communities to our friends from Afghanistan and Ukraine. Many may have experienced or have been separated from the friends and communities that have previously been of support to them, and this can increase their vulnerability. Whilst many will not have adult social care needs, it is still important that throughout the last year we considered and took account of those risks and worked across the partnership, and our organisations, to make sure we have in place the right support to enable our new friends to settle and re-build their lives in welcoming places. We must continue to recognise that new communities settling in our area bring new culture, history, skills, strengths, assets and gifts that will contribute to making North Northamptonshire more vibrant as a place to live, learn and work.

Cost of living challenges have become more pronounced, and this also brings with it new challenges that can often be even greater for people with health and social care needs. Our organisations involved in safeguarding adults in the county have been mindful of this, ensuring that we adapt our practices to try to recognise and intervene early and prevent concerns escalating, and it is something that the Board considers in how it monitors safeguarding practice in the county.

Whilst not directly a part of NSAB work, there has been significant work across our Integrated Care System in working at a community level through Local Area Partnerships. I am interested to see how we can maximise the opportunities this presents in improving safeguarding practice, but also community resilience and awareness around supporting people that may be at greater risk of abuse or neglect that live in their community.

Whilst previously we agreed at Strategic Board, the role of NSAB Chair would change on an annual basis, we have found that a two-year period is a more pragmatic approach for term of the Chair. I have therefore agreed, with the support of the Board, that I will remain as Chair for the next year, and we will rotate the Chairing arrangements at the end of the next reporting year.

I do hope you find the annual report an interesting read and would wish to extend my thanks, on behalf of Northamptonshire Safeguarding Adults Board, to all those involved in working so hard to try to make sure that our Adult Safeguarding arrangements are the best they can possibly be.



**David Watts**

**Executive Director for Adults, Health Partnerships  
and Housing, North Northamptonshire Council  
Chair, Northamptonshire Safeguarding Adults Board**



# Annual Report Overview

The Annual Report 2022-2023 provides an overview of NSAB’s achievements against the Strategic Plan 2021-23 for the period 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.

In January 2023, NSAB members met face to face at a development session at Northampton Guildhall, to review and refresh the strategic plan. Working in small groups, there was positive discussion supported by the use of Mentimeter<sup>1</sup> (interactive presentation software) to poll members to ensure all member voices were captured. After working virtually for so long due to the pandemic, it was great to meet with members in one room and to experience a really positive, enthusiastic atmosphere, good interaction and discussion.

Members agreed to retain the existing three priorities: Prevention, Quality and Making Safeguarding Personal (MSP), whilst updating the key objectives in light of the changing landscape and emerging trends. A task and finish group was held in February to prioritise the objectives for the strategic plan 2023-2026. At the of writing this report, the strategic plan for 2023-2026 had not been approved by NSAB.

The NSAB Strategic Plan is aligned with the six key principles as outlined in the Care Act:



## Empowerment

People are supported and encouraged to make their own decision and informed consent.



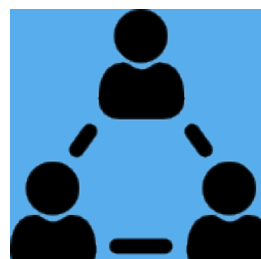
## Protection

Support and representation for those in greatest need.



## Prevention

It is better to take action before harm occurs.



## Partnership

Local solutions through services working with their communities.



## Proportionality

The least intrusive response appropriate to the risk presented.



## Accountability

Accountability and transparency in delivering safeguarding.

<sup>1</sup> Interactive presentation software - Mentimeter

# Jane Geraghty

## Independent Scrutineer

**I am positive about my year's work as Independent Scrutineer for NSAB.** I can report that partnership arrangements are strong as evidenced at the strategic development event in January 2023, which was held to review previous priorities, themes/objectives, and discuss new and emerging issues.

My role has been understood and respected by partners. The culture of the Safeguarding Board is non-defensive, not afraid to challenge, and be challenged. It is genuinely sighted on continuous learning to improve the safety of those with care and support needs.

My desire for assurance has been met with standing invites to North and West Northamptonshire Councils' Quality Boards. Meeting invites to attend the Northamptonshire Mental Health, Learning Disability and Autism Collaborative, and Northamptonshire Integrated Care Board's System Quality Board.

I have continued to Chair the NSAB Quality and Performance Sub Group, and it is pleasing to see how the data dashboard has evolved over the course of the year, and now contains information from all statutory partners around risk, mitigations and emerging issues.

I led a multi-agency case audit (MACA) on learning disability and self-neglect, and also agreed a learning briefing for a previous MACA regarding Adult Risk Management (ARM) that started just prior to year-end.

Discussion commenced to agree a new quality assurance process to review Safeguarding Adult Reviews (SARs) and multi-agency case audits at 3 monthly intervals to provide an improved quality assurance response and challenge.

Discussions are also taking place about how assurance can be obtained about other partner quality and assurance work.

Work around preparing for the CQC framework inspections of local authorities will continue into the new financial year.

There was continued focus on Making Safeguarding Personal (MSP), concerns and outcomes for those who do not meet section 42 safeguarding enquiry criteria, and embedding important learning from Safeguarding Adult Reviews, single and multi-agency case audits.

A refresh of the engagement strategy will support NSAB's commitment to receiving feedback from those in the community with lived experience of safeguarding.

This is not an easy task, but NSAB is committed to hearing the voice of service users. In this regard, a wider stakeholder event is being planned for later in the year to share information about the work of NSAB, and to hear the voices of those with lived experience to help better inform members.

We also want to develop multi-agency practitioner forums to receive information from those working on the 'front line'.

I have retained my links with 4 thematic groups in the Voluntary and Community Sector Assembly, and regularly raise safeguarding matters and seek information about emerging issues. Access to mental health services, bespoke advocacy support, carer stress and lack of volunteers were identified as key concerns from the groups.

My challenge log remained a standing agenda item at every strategic NSAB meeting, with partners taking responsibility to move actions forward to completion.

The support provided by the NSAB Board Office is of the highest standard.

The context of the work is challenging but is owned professionally by NSAB.



**Jane Geraghty**  
**Independent Scrutineer**  
**Northamptonshire Safeguarding Adults Board**

# Progress and Achievements

## Strategic Board

NSAB Strategic Board meetings continued to be held bi-monthly and virtually via Microsoft Teams during the course of the year, other than a strategic development session in January 2023. Moving to in-person meetings was agreed at strategic board in February 2023.

Eight meetings were held - six Strategic Boards, one strategic development session, and one task and finish group to agree the findings to support strategic planning.

We are pleased to advise that there was 100% attendance from statutory partner representatives. There was also good engagement from other members including cabinet portfolio holders and opposition members<sup>2</sup>.

Appropriate challenge was made regarding representation and attendance at Sub Groups where necessary, supported by the Independent Scrutineer and her Challenge Log.

Strategic Board received bi-monthly updates from the Independent Scrutineer, as well as respectful challenge regarding issues brought to her attention during the course of her work (documented in the Challenge Log), and the Chair of the Delivery Board. The following presentations were also received over the course of the year:

- Quarterly data dashboard
- Safeguarding Adult Review (SAR) status (bi-monthly)
- Mental Health Use of Force Act
- Police Prevention and Intervention Command – Observatory Demonstration
- Mental Health Hospitals
- NSAB Self-assessment report
- Adult Social Care
- Social Care Reform
- Adult Risk Management (ARM)
- MSP – Assurance that MSP is embedded in partner organisations

The Delivery Board Chair's updates highlighted progress made against the operational delivery plan's key themes and objectives. Sub Group Chair updates were also provided for information at every meeting to report on the achievements made and also to report on any barriers faced in successfully achieving the key activities.

To support the increased activities of the Board, recruitment for additional staff was approved, and a new part-time Business Support Officer joined the Business Office in January 2023.

## Delivery Board

The purpose of the Delivery Board is to oversee progress made against the NSAB strategic plan, and the necessary operational Sub Group activities to support the plan's key priorities and objectives. The Sub Groups are instrumental in delivering the core activities to support the plan and more detailed information is provided in this report below.

Joseph Banfield, Detective Superintendent with Northamptonshire Police continued to Chair the Delivery Board.

8 meetings were held during the course of the year - 6 Delivery Board meetings and 2 task and finish groups to review the NSAB risk register. Again, there was 100% attendance from statutory partner representatives. All Sub Groups were represented at the meetings by either the Chair or Vice-Chair.

---

<sup>2</sup> A review of the membership and terms of reference for both Boards and all Sub Groups will be undertaken at the start of the new financial year.

# Progress and Achievements

## Delivery Board continued

Unfortunately, there was no consistent representation from St. Matthews Healthcare, HM Prisons, and the Voluntary & Community Sector Assembly.

Throughout the year the five themes/objectives from the strategic plan remained a focus for NSAB:

1. Raising Awareness of NSAB and Safeguarding
2. Learning from Safeguarding Adult Reviews
3. Understanding the Impact of Covid-19
4. The Difference NSAB Makes
5. Homelessness

Progress on the delivery plan was monitored at every bi-monthly meeting, and there was good progress made by Sub Groups during the course of the year. Further detail is shared in the Sub Group sections below.

In addition to the standing agenda items of Sub Group Chair updates, risk register review, housing/homelessness updates, members also received presentations on the following topics:

- Police Observatory
- Exploitation and Serious Organised Crime
- Suicide Prevention
- Mental Health
- Integrated Care System
- Oliver McGowan Training
- Learning Disability Review (LeDeR)
- Anti-poverty work and strategy (North and West Northamptonshire Councils)
- Asylum seeker update (West Northamptonshire Council only)

## Communications & Engagement Sub Group

The group met 3 times during the year, and two task and finish groups were held to discuss the service user feedback pilot project in partnership with Healthwatch North & West Northamptonshire. Engagement from members was good, who attended meetings with energy and enthusiasm to support discussion about increased communication and engagement provision. The Vice Chair Chaired one meeting in the Chair's absence. Unfortunately, there was limited engagement from Trading Standards and the Voluntary and Community Sector Assembly.

### Raising Awareness

The #Report It campaign materials continued to be shared at community engagement events including: International Women's Day, World Café events, and the hugely successful Warm Welcoming Spaces initiative in North and West Northamptonshire. We are unable to provide qualitative evidence of the impact this campaign has had, however, there was a 30% increase in the number of safeguarding concerns received and an increase in conversion rate from concern to s42 enquiries, so we would like to think we played a key part in raising awareness.



A poster with a dark blue background. At the top, the text 'Safeguarding is everyone's business' is written in white. Below this is a row of five small, square, black and white photographs of diverse people of various ages and ethnicities. Underneath the photos, the text 'If you suspect someone is at risk of harm or abuse' is written in white, followed by the hashtag '#ReportIt' in a larger, bold white font. At the bottom, there are two phone numbers: 'North Northamptonshire Council 0300 126 3000' and 'West Northamptonshire Council 0300 126 7000'. Below these numbers, it says 'In an emergency call 999'.



# Progress and Achievements

## Communications & Engagement Sub Group continued

### Supporting our Communities

Following the successful launch of the #Report It campaign, the general safeguarding information posters were updated with more relevant imagery (one of the examples can be found below), and translated into 10 different languages to support our larger community groups in the county. Translations included: Arabic, Bangladeshi, Chinese, Greek, Gujarati, Pashto, Polish, Tamil, Ukrainian, and Urdu. [The link to the #Report It translations can be found here on the NSAB website.](#)



In March 2023, easy read safeguarding information was updated and uploaded to the NSAB website, together with a voice over to provide a simple, concise understanding of safeguarding, and who to contact if an adult suspects they, or someone they know, may be subject to abuse and neglect. This was an excellent example of co-production for the group. Not only were the group supported by two student social workers from West Northamptonshire Council, but there was also engagement from three separate organisations and their service users, who kindly gave their input and feedback on this piece of work. We would like to thank Gladstone Day Centre, Shepherd Heights Limited and Spectrum Northants for their involvement. [You can access the information and voice over here on the NSAB website.](#)

### Website and Social Media

The NSAB Business Office continued to use the NSAB Twitter account pro-actively to share information with our c. 650 followers (both local and nationwide). We saw an increase of 180 followers from the previous year. If you don't follow us yet, please do so by following [@NorthantsSAB](#).

Website analytics highlighted that activity peaked in May and November 2022 with 1,221 and 1,385 visits retrospectively. Activity coincides with the NSAB weeks of learning. Activity was comparable to 2021-22.

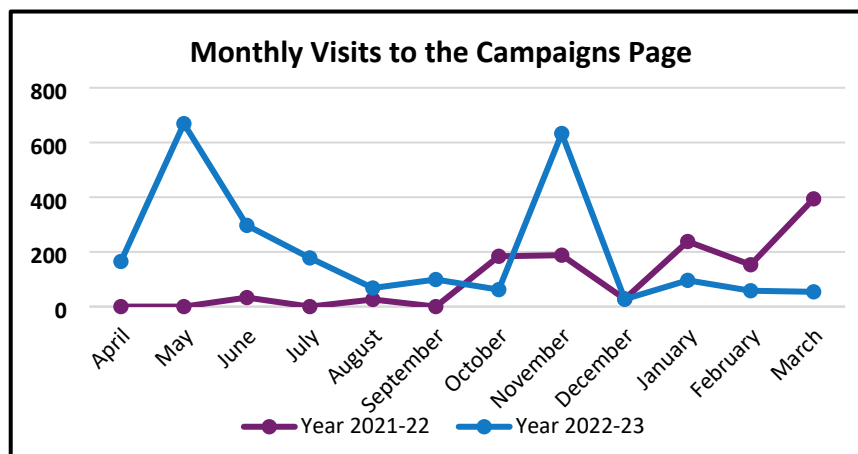


# Progress and Achievements

## Communications & Engagement Sub Group continued

The NSAB website was reviewed and updated throughout the year to provide a range of information to support both the public and practitioners including campaigns and learning opportunities.

Views to the campaigns page saw spikes in May and November, with a vast increase in activity compared to the previous year. It is evident that peaks in activity to the website correlate to campaigns such as the weeks of learning held twice during the year.



The Business Office supported the communication and promotion of the two weeks of learning held in June and November.

### What didn't work so well?

1. The pilot with Healthwatch that commenced in July 2022 to obtain feedback from service users involved in a s42 safeguarding enquiry did not generate the information expected. Unfortunately, we struggled to obtain the necessary contact details from North and West Northamptonshire Councils, despite working with a small task & finish group. There will be renewed focus in the forthcoming financial year.
2. We tried to recruit a senior representative from the Voluntary and Community Sector Assembly, without success. This was primarily due to capacity issues for the various Thematic Group Chairs.

### Priorities for 2023 – 2026

1. Ensure the partnership has mechanisms in place to capture the voice of people with lived experience.
2. Deliver a targeted, preventative approach of communication and engagement based on data and intelligence.

*We will develop a plan of engagement events with stakeholder groups such as mental health and carers. We will use of existing partner forums already in place, host quarterly multi-agency practitioner forums, and events specifically aimed to capture the voice of those with lived experience of abuse and neglect to help inform the work of NSAB.*

# Progress and Achievements

## Learning & Development Sub Group

The group met six times during the year. Member engagement was good with 100% attendance from statutory partners.

The Chairing arrangements for the group changed in December 2022, with Sarah Morris, Principal Social Worker, North Northamptonshire Council taking over the role of Chair in light of Jane Bowen's retirement in March 2023. We would like to thank Jane for her support and leadership of the group, and wish her well for the future after 40+ years' service with Northamptonshire County Council, and latterly West Northamptonshire Council.

Margaret Mills, Named Professional and Safeguarding Lead/Head of Social Work CAMHs, St Andrew's Healthcare became Vice Chair of the group.

The group developed two further 'weeks of learning'. The third being held in June and the fourth in November. Participation in the events continued to be very positive. The Business Office were instrumental in organising the weeks of learning and supporting on the day. Details are shared with you below:

### Weeks of Learning

Registration was delivered via Eventbrite, with all sessions provided free to colleagues using Microsoft Teams.

#### Monday 13th – Friday 17th June 2022

|  | No. of Registrations | No. of Attendees | No. of Evaluations |
|--|----------------------|------------------|--------------------|
| Introduction to Multiple Exclusion Homelessness and Safeguarding | 115                  | 79 (68%)         | 55 (69%)           |
| ARM – How to Chair and manage the process                        | 99                   | 67 (67%)         | 43 (64%)           |
| Launch of the Hoarding Framework                                 | 141                  | 91 (64%)         | 49 (54%)           |
| Introduction to Safeguarding Adults                              | 124                  | 71 (57%)         | 48 (67%)           |
| Mental Capacity Act 2017 & Assessment                            | 139                  | 85 (61%)         | 54 (63%)           |
| <b>Total</b>   | <b>618</b>           | <b>393 (64%)</b> | <b>249 (63%)</b>   |

Feedback from the June event was extremely positive, with 96% attendees stating the sessions were informative and helpful to their role and they would use the learning to support their learning. 90% attendees said that they feel confident to share the learning from the events with their colleagues.

#### Tuesday 22nd – 25th November 2022

|  | No. of Registrations | No. of Attendees    | No. of Evaluations  |
|--|----------------------|---------------------|---------------------|
| Learning with multi-agency case studies  | 75                   | 46 (61%)            | 30 (65%)            |
| The importance of multi-agency working complex safeguarding cases                        | 100                  | 54 (54%)            | 35 (65%)            |
| Multi-disciplinary team management regarding complex mental health and social care needs | 90                   | 45 (50%)            | 18 (40%)            |
| Contextual safeguarding with adults within a family                                      | 110                  | 61 (55%)            | 26 (43%)            |
| <b>Total</b>   | <b>375</b>           | <b>206 (54.93%)</b> | <b>109 (52.91%)</b> |

Again, feedback from the November event was very positive, with 91.74% stating the sessions were informative and helpful to their role and they would use the learning to support their learning. 91.74% attendees said that they felt confident to share the learning from the events with their colleagues.



# Progress and Achievements

## Learning & Development Sub Group continued

### Access to recorded week of learning sessions

All learning sessions were recorded and uploaded to the NSAB YouTube account. You can access all recordings to 31<sup>st</sup> March 2023 on the [NSAB website](#).

As part of the evaluation, and to determine if colleagues are aware of the NSAB website, additional questions were asked about access to the website in the previous 4 weeks, and what resources they had referred to.

| NSAB website resources referred to in previous 3 months | June /<br>No. of people | November /<br>No. of people |
|---|-------------------------|-----------------------------|
|   | 52%                     | 62%                         |
| ARM Toolkit including ARM Video                         | 77                      | 33                          |
| Decision Making Framework                               | 63                      | 33                          |
| Escalation Policy                                       | 9                       | 13                          |
| Information Sharing Policy                              | 32                      | 27                          |
| Inter-Agency Policy & Procedure                         | 13                      | 19                          |
| Self-Neglect Guidance                                   | 49                      | 26                          |
| Safeguarding Adult Review Reports                       | 70                      | 39                          |
| MACA Learning Briefings                                 | 15                      | 8                           |
| Herbert Protocol  | 35                      | 8                           |
| Week of learning videos 2021                            | 20                      | 8                           |
| Tricky Friends Animation                                | 24                      | 2                           |
| Other   | 65                      | 8                           |

Whilst there was an increase in the number of colleagues accessing the website, access to policy and processed was not increased.

General comments received regarding the website included:

*"No other resources needed, I think it's great."*

*"I find all the resources helpful."*

*"I found the NSAB website really comprehensive."*

*"I like what's on the website and how easy it is to apply the resources."*

### What didn't work so well?

1. Understanding the training requirements for registered care home managers.
2. Understanding a breakdown of the training undertaken by adult social care staff in response to the annual training return.
3. Identifying free safeguarding adults training for the voluntary and community sector.

### Priorities for 2023 – 2026

1. Support partnership workforce development to ensure colleagues are confident in the application of their safeguarding duties and responsibilities.
2. Seek assurance that the workforce recognises when a person has been affected by a traumatic incident where this has a long-lasting effect on their mental and physical well-being.

*We will develop innovative ways to support the wider partnership workforce to help improve knowledge and confidence. Topics will include Mental Capacity Act and assessment, adult risk management (ARM), professional curiosity, transitional safeguarding, think family and trauma informed practice.*

# Progress and Achievements

## Quality & Performance Sub Group

The group met four times during the year, and 3 task and finish groups were also held. Member engagement was not as good as expected with 87.5% attendance from statutory partners, and poor engagement from St. Matthews Healthcare and Public Health.

The dashboard continued to be developed during the course of the year. The quarter 4 dashboard showed real progress in relation to partner commentary about emerging issues, risk and mitigating action taken with the introduction of a new process and template for statutory partners. Other key partners will also be asked to complete the template on a quarterly basis.

The group discussed a number of key issues during the period which had been identified from information and data received. Some of these topics necessitated separate task and finish groups:

1. The rate of conversion from safeguarding concern through to s42 enquiry.
2. High number of concerns received from the Police and East Midlands Ambulance Service that did not result in safeguarding enquiry.
3. Improved recording needed for Making Safeguarding Personal (MSP) outcomes.
4. Improved quality assurance processes for Safeguarding Adult Reviews (SARs) and multi-agency case audit developed.

## Audit Activities

### Partner self-assessment audit

The self-assessment audit process commenced the latter part of 2019 and took two and a half years to complete because of the pandemic. The audit was split into three key sections: the main self-assessment audit, additional questions relating to Covid-19, and lastly, review and challenge sessions.

Fifteen partners took part in the process, with five agencies meeting full compliance in the audit (Northamptonshire NHS Clinical Commissioning Group (now Northamptonshire Integrated Care Board), Northampton General Hospital, Northamptonshire Police, Public Health Northamptonshire, and Voice), four agencies reached almost full compliance, three agencies had a few areas to complete to be fully compliant, and the remaining three agencies still had some work to do.

The audit covered six key areas: governance and partnership, policies and procedures, human resources and workforce, quality assurance and monitoring, and making safeguarding personal. A detailed report of the findings was shared with Board in August 2022.

A series of review and challenge sessions, led by the Independent Scrutineer and Business Manager were held with all partners in May and June 2022. Additional questions relating to the impact of Covid-19 on safeguarding and service users, and planning for Ukrainian refugees were also explored.

The challenge sessions provided an opportunity to review the progress made during a particularly difficult time for all agencies and to validate the responses received, and to discuss other emerging themes, particularly the impact the pandemic had on safeguarding practice, and feedback from service users, and potential concerns regarding the support for Ukrainian refugees staying in the county. The Independent Scrutineer asked for assurance on outstanding areas and that action plans were in place to complete the audit. There were four key emerging areas identified from the challenge sessions:

1. Mental Capacity Act and Assessment
2. Insufficient mental health provision
3. Recruitment and retention of staff
4. Cost of living crisis and the impact on mental health

Recommendations for NSAB and next steps have been allocated to the Learning & Development and Quality & Performance Sub Groups.

# Progress and Achievements

## Quality & Performance Sub Group continued

### Multi-Agency Case Audit (MACA)

Three multi-agency case audits (MACA) were published during the year:

1. **Homelessness** – the learning briefing for the MACA undertaken in October 2021 reviewed six cases where homelessness, or risk of homelessness was apparent, was published in May 2022.
2. **Adult Risk Management (ARM)** MACA also undertaken at the end of the previous financial year in respect of 'Alan' (pseudonym), a gentleman considered to be in the multiple exclusion homelessness cohort, was published in October 2022.
3. **Learning Disability and Self-neglect.** The MACA was held in June 2022, and was published in December 2022. Adult B was an individual with mild learning disability who was self-neglecting, and sadly died. A number of repeated themes were identified from the audit making it difficult to identify any new SMART recommendations already recognised in previous reviews.

You can find the learning briefings for all three case audits on the [NSAB website by following this link](#).

### Single Agency Audits

In February 2023, members agreed to undertake a single agency audit on Making Safeguarding Personal (MSP). The findings will be shared in next year's report.

An audit on Mental Capacity Act (MCA) & Assessment was agreed for Q1 2023-24. Members agreed to dip sample 10 cases, and were asked to consider the parameters for the audit. Questions should include the quality of reporting mental capacity, including where capacity is assumed, and the rationale to assuming the individual has capacity to make unwise decisions.

Each year, NSAB ask health and social providers to undertake an annual Serious Incident and Safeguarding Audit. At the February meeting it was agreed to defer to the end of 2023 in light of the move to a new [Patient Safety Incident Response Framework \(PSIRF\)](#), which replaces the current Serious Incident Framework.

### Quality Assuring Reviews

At a Task and Finish group meeting in February 2023, members agreed to pilot a new quality assurance process to review SAR and MACA recommendations every 3 months. This will commence in 2023-24.

### Policies and Procedures

Work began on refreshing a number of policies including: Decision Making Framework, Information Sharing Protocol, Self-neglect guidance, and The Inter-Agency Policy and Procedure.

### What didn't work so well?

1. Membership and commitment from some partners.
2. Lack of timely response from some partners to Business Office requests.
3. The length of time taken to review and refresh policies and procedures.

### Priorities for 2023 – 2026

1. Support partnership workforce development to ensure colleagues are confident in the application of their safeguarding duties and responsibilities.
2. Seek assurance that the workforce recognises when a person has been affected by a traumatic incident where this has had a long-lasting effect on their mental and physical well-being.

*We will develop innovative ways to support the wider partnership workforce to help improve knowledge and confidence. Topics will include Mental Capacity Act and assessment, adult risk management (ARM), professional curiosity, transitional safeguarding, Think Family and trauma informed practice.*

# Progress and Achievements

## Safeguarding Adult Review Sub Group

The well-established multi-agency group met 6 times during the year. Membership of the group covers a range of professionals from health, social care, and community safety. Member engagement was good, with 100% attendance from statutory partners, although it is recognised that when colleagues attend in the member's stead, a lack of continuity is apparent.

The volume of Safeguarding Adult Review (SAR) activity was incredibly high during the year, with 17 new referrals received between April 2023 and March 2023, and five ongoing SARs, 021, 022, 024, 026/035 (thematic review), and 037. In comparison, there were 6 SAR referrals in the previous year. The volume in activity created increased pressure on the Sub Group and Business Office.

There was a high level of activity needed to progress the ongoing SARs, and a number of challenges faced, particularly with SARs 021 and 022.

NSAB commissioned two Safeguarding Adult Review training sessions. Due to limited level 4 training available, NSAB asked the University of Northampton to develop bespoke multi-agency in line with the requirements in the Training Strategy's expected competencies. The training was held in September 2022. In March 2023, Consultant, Sylvia Manson, provided a SAR reflection and development session for SAR Sub Group members. The session was to support members with strong governance, decision making, learning from previous SARs, and trouble shooting. The feedback on both sessions was excellent with colleagues finding the sessions incredibly helpful.

The group continued to discuss actions from the national SAR analysis such as the interface between s42 Safeguarding Enquiries and s44 Safeguarding Adult Reviews, but due to the level of referrals and ongoing SARs, this was not a priority activity.

The SAR Chair led two events in July and August 2022 to progress the composite action plans for SARs 016 and 019, which resulted in the completion of the SAR 019 composite action plan in February 2023. As of 31<sup>st</sup> March 2023, only one action remained in progress in the SAR 016 composite plan. Progress had previously been hampered due to the pandemic.

The composite action plan for SAR 010 had one remaining action for Northamptonshire Children's Trust in respect of a major IT system change and implementation - we were aware that this was an action that would take considerable time.

Further information on Safeguarding Adult Review statistics can be found below.

### What didn't work so well?

1. The delay in completing SARs, 021 and 022 in a timelier manner, although some factors were out of our control in respect of 021.

### Priorities for 2023 – 2026

1. Effectively manage and publish Safeguarding Adult Reviews.
2. Reflect on learning from local and national statutory reviews and good practice to inform new ways of working.

*We will ensure strong governance is in place. We will develop skills to use alternative methodologies to identify relevant learning. We will review and refresh the SAR Protocol in response to recent SARs, and support the individual and families to contribute to reviews. We will support the Learning & Development Sub Group to disseminate learning to equip the workforce with review findings, and we will review themes from SARs and take action where there are repeat incidences in referrals.*

# Progress and Achievements

## Safeguarding Adult Reviews

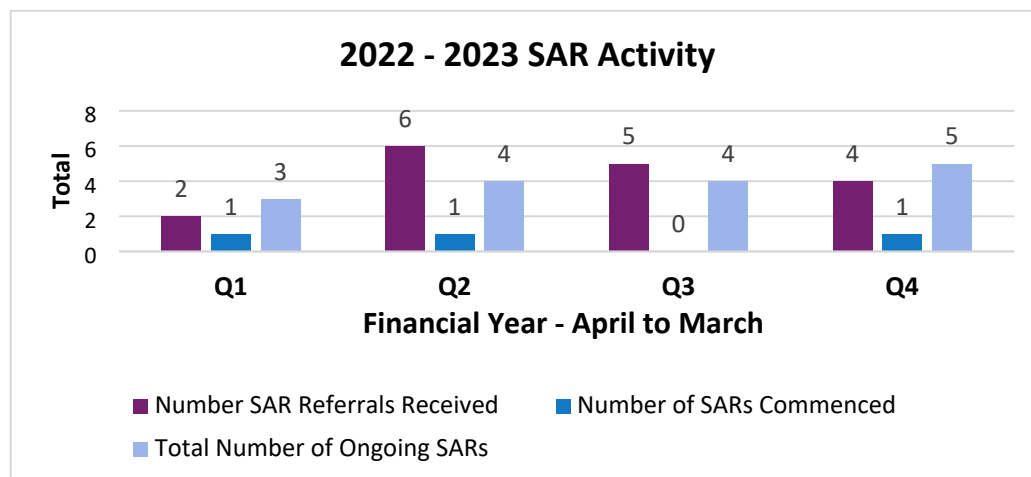
The Safeguarding Adults Board (SAB) must arrange a Safeguarding Adult Review (SAR) when an adult in its area dies as a result of abuse or neglect, whether known or suspected, and there is concern that partner agencies could have worked more effectively to protect the adult. The SAB must also arrange a SAR if the same circumstances apply where an adult is still alive but has experienced serious neglect or abuse.

### Criteria for a Safeguarding Adult Review

1. A SAB must arrange for there to be a review of a case involving an adult in its area with needs for care and support (whether or not the local authority has been meeting any of those needs); if –
  - (a) There is reasonable cause for concern about how the SAB, members of it or other persons with relevant functions worked together to safeguard the adult; and
  - (b) Condition 1 or 2 is met.
2. Condition 1 is met if:
  - (a) The adult has died; and
  - (b) The SAB knows or suspects that the death resulted from abuse or neglect (whether or not it knew about or suspected the abuse or neglect before the adult died).
3. Condition 2 is met if:
  - (a) The adult is still alive; and
  - (b) The SAB knows or suspects that the adult has experienced serious abuse or neglect.
4. A SAB may arrange for there to be a review of any other case involving an adult in its area with needs for care and support (whether or not the local authority has been meeting any of those needs).
5. Each member of the SAB must co-operate in and contribute to the carrying out of a review under this section with a view to:
  - (a) Identifying the lessons to be learnt from the adult’s case; and
  - (b) Applying those lessons to future cases.

The graph below details SAR activity between April 2022 – March 2023 by each quarter.

A total of 17 SAR referrals were received during the financial year (April to March), with initial scoping (information trawl with partner agencies) undertaken for each referral to aid decision-making and discussion at SAR Sub Group.



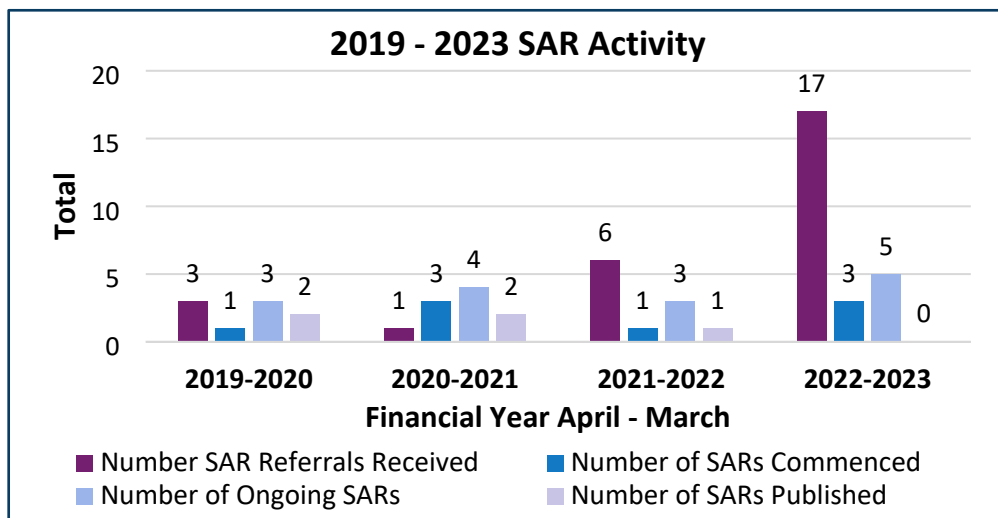
The number of ongoing SARs in each quarter reflects both the number of SARs started during that quarter and those continued from the previous quarter/year.



# Progress and Achievements

## Safeguarding Adult Reviews continued

The below graph details SAR activity dating back to financial year 2019 - 2020, and shows an increase in the number of SAR referrals received between April 2022 – March 2023 in comparison to previous years.



Ongoing SARs as of 31<sup>st</sup> March 2023:

| Reference                 | Reason for Referral - Summary           | Approved by Statutory Partners | Published |
|---------------------------|---|--------------------------------|-----------|
| 021                       | Serious neglect reported at a care home | June 2020                      | Ongoing   |
| 022                       | Male - suicide                          | July 2021                      | Ongoing   |
| 024                       | Female - self-neglect                   | March 2022                     | Ongoing   |
| 026/035 (thematic review) | Male - homelessness                     | July 2022 & November 2022      | Ongoing   |

The Safeguarding Adult Review (SAR) Sub Group has responsibility for considering SAR referrals, and for managing the SAR process. The group has strong links with other NSAB Sub Groups to ensure that the monitoring and communication of SARs and other type of reviews are undertaken, and that learning is embedded. The Chair of the Sub Group has responsibility for keeping NSAB updated on the progress of SARs.

There were no SARs published in 2022-23.



## Working in Partnership - Our Key Statutory Partners

**NSAB worked closely with its statutory partners; NHS Northamptonshire Integrated Care Board, North Northamptonshire Council (NNC) Northamptonshire Police. All statutory partners are represented on the Strategic and Delivery Boards and all four Sub Groups.**

### **NHS Northamptonshire Integrated Care Board - Achievements in 2022-2023**

1. From 1st July 2022, NHS Northamptonshire Clinical Commissioning Group (CCG) became NHS Northamptonshire Integrated Care Board (ICB). The statutory and legal responsibilities for safeguarding were successfully transferred.
2. The ICB System Quality Meeting and ICB Quality Committee was formed to ensure that there was a clear governance process in place for safeguarding. Both the safeguarding policy and strategy have been revised. Safeguarding adults training compliance for level 1 is 83% which is the competence that the majority of ICB staff require.
3. The ICB has worked with NHSE and attended regional Liberty Protection Safeguards (LPS) meetings. This has included completing the LPS Maturity Matrix on a quarterly basis to gain assurance and measure the ICB's readiness for the introduction of the legislation. This workstream has now been discontinued following the national announcement of the implementation of LPS being delayed.
4. The interface between the local serious incident and safeguarding adult guidance has been challenging with variable adherence by health providers. This workstream will continue and adjust accordingly during the next year in light of the introduction of the new Patient Safety Incident Response Framework (PSIRF).
5. The ICB has successfully worked with partners to ensure that the identification and management of domestic abuse is considered across the health system. This has included the re-instatement of Hospital Independent Domestic Violence Advisors (IDVA's).
6. The Designated Nurse has effectively chaired the Safeguarding Adult Review (SAR) Sub Group which has had to manage a large number of referrals and complex cases and required synergy across the partnership.
7. The GP safeguarding forums continue to be well received (84 attendees at the March forum) and reverted back from virtual to face-to-face meetings. Presentations include domestic abuse, the Mental Capacity Act and learning from local SAR's. The GP safeguarding web page and resources have been reviewed and updated.

### **NHS Northamptonshire Integrated Care Board - Areas for development in 2023-24**

1. Ensure that the ICB statutory duties of the Serious Violence Duty are executed. This includes ensuring relevant data is collated, contributes to the strategic needs assessment and funding is obtained to ensure that signs of serious violence are identified to aid prevention across the health system.
2. Following the review of the quality schedules for health providers, continue to gain assurance that statutory and legal responsibilities of safeguarding are in place and that learning from internal and local incidents are embedded. This will include assurance visits.
3. Continue to ensure that the principles of the Mental Capacity Act are embedded across the system and any restrictions applied are within a legal framework.

# Working in Partnership – Our Key Statutory Partners

## North Northamptonshire Council - Adult Social Care - Achievements in 2022-2023

1. Target Operating Model - NNC employed a Principal Social Worker (PSW) who worked with teams to review and update their ways of working and guidance to continually improve the way we work. This led to a decrease in the numbers of people awaiting involvement from ASC and teams reporting that they felt more in control of their work and the risks that they were holding. The PSE also supported with bite sized training to address areas of development, providing best practice examples. Our practice audits reviewed whether we were practising as we would wish.
2. Safeguarding Process - A project group was set up in August 2022 to review the safeguarding process and implement recommendations from the internal audit completed in February 2022. There was a lack of agreement from teams within Adult Services to have a single point of access for responding to safeguarding concerns. Instead, the project focused upon the process and the forms. A new online referral form was implemented in March 2023, and temporary changes were requested to the Eclipse Concern form. New guidance has been written to provide guidance and a clear pathway for Notification of Concerns ensuring the difference between safeguarding and concerns related to quality of care. Initial meetings took place with learning and development regarding changes to the current training programme and will continue during 2023/24. The Notification of Concerns process was reviewed and guidance shared widely through NNC in March 2023.
3. Safeguarding Adult Reviews - In response to findings from SARs, the PSW provided training on Mental Capacity Act (MCA) for Housing colleagues, and provided support on specific situations.
4. Safeguarding awareness & information packs were distributed to all providers in October 2022. The packs were shared with partner agencies including the ICB to support oversight & evidence information had been given to providers.
5. PSWs from the Provider Safeguarding Team presented at team meetings to raise awareness. Link roles remain with PSWs covering Primary Health Care, Nursing homes, learning disability services, residential homes and home cares.
6. Following the service improvement plan the service has worked exceptionally hard to put strategies in place to reduce the backlog of DoLs (Deprivation of Liberty Safeguards) from 1260 (April 2022) cases to 797 cases (April, 2023). This is a significant improvement and evidence that the action plans from the Service improvement plan are being implemented effectively.
7. A new Safeguarding Quality Assurance Audit Tool was developed. The tool incorporates relevant legislation and focusses on performance across four domains: User involvement and outcomes, effective practice and performance, working together and management oversight and supervision.
8. A safeguarding audit process commenced in October 2022 with ten cases that had been through the S42 enquiry process and been closed during the quarter 2 reporting period.
9. A report of the findings from the Safeguarding Quality Assurance Audit was completed in December 2022 and identified training, development opportunities and actions.
10. We worked with Safeguarding Assurance (Provider) Team in March 2023 to ensure a team approach and increased understanding of Key Performance Indicators (KPIs) and the Corporate Scorecard.
11. A review of the effectiveness of the Adult Risk Management (ARM) process has been completed, including an audit of five cases, and planning has commenced with the Learning and Development Service to design and implement ARM training.
12. Safeguarding Quality have attended training sessions on Professional Curiosity and Safeguarding Level 3 Enquiry Skills with training provided by the Learning and Development service, and are assured regarding the standard of training provided to NNC staff in these areas.



# Working in Partnership – Our Key Statutory Partners

## North Northamptonshire Council - Adult Social Care - Areas for Development in 2022-2023

1. On-going review of adult services structure and whether they provide the best service, and what might be required in the future. This is being done across teams with a planned away day with managers from across the service on 21<sup>st</sup> April 2023 to progress.
2. A co-produced strategy to support user engagement to be drafted, as well as a co-produced adult social care strategy and delivery model for the next five years in 2023/24.
3. Guidance regarding the interface between S42/44 will be completed and sent to NSAB Safeguarding Adult Review Sub Group in relation to the SAR National Analysis action log.
4. Updated guidance will be completed regarding responding to Public Protection Notices received from the Police.
5. NNC will continue to participate in the Safeguarding Adult Review (SAR) Sub Group (and other groups) and provide SAR panel representation.
6. A review of mandatory safeguarding training will take place to support ongoing discussions between the Learning and Development Team and Safeguarding Quality to agree next steps.
7. The PSW and Housing colleagues are considering the opportunity for workshops with Housing teams to discuss questions of capacity likely to arise in their work.
8. Subject to Executive Director agreement, we will offer spaces to our contracted external providers on our in-house training. We anticipate this starting in Q2 2023/24. A 6-month pilot has been agreed with selected courses identified by Brokerage and Commissioning. This is for contracted providers.
9. Assurance work with Hospital leads to plan a joint approach to assurance to ensure safety within safeguarding process for mental health.
10. Discussions to take place with the Business Unit regarding the creation of a safeguarding resource area on the Intranet.
11. Ongoing work to increase awareness of and improve KPIs and the corporate scorecard reporting.
12. Increase understanding and assurance regarding enquiries relating to providers.
13. Ongoing work to ensure that the principles of Making Safeguarding Personal are embedded in practice.
14. Implement co-production in safeguarding by seeking opportunities for feedback regarding the safeguarding process by offering questionnaires and interviews.
15. Implement 7 Minute briefings and presentations on Making Safeguarding Personal, Professional Curiosity, and recording standards.
16. Multiple Exclusion Homelessness (MEH) Train the Trainer event is scheduled for 20th April. This is being delivered to representatives from NSAB partners to enable them to deliver training within their own organisations.
17. Colleagues are planning for events for the NSAB week of learning in June 2023.
18. A risk tool will be trialled across teams prior to implementation across all social care teams.
19. Learning & Developing to roll out supervision training across ASC – managers to attend and then any further support required to be identified and provided.
20. Closure letters following safeguarding enquiries to include the offer to speak with Healthwatch as part of the NSAB MSP survey to review how well we put people at the centre of the process.

# Working in Partnership – Our Key Statutory Partners

## Northamptonshire Police - Achievements in 2022-2023

1. In May 2022, a 'Public Protection Review' was commissioned by Northants Police. From initial findings, several changes were authorised by the Force's Senior Leadership Team. In total, 17 changes were proposed and 15 of these are now complete and embedded. The objectives of the re-organisation were to:
  - Put prevention, safeguarding and criminal investigation at the heart of PVP
  - Have the MASH as a central safeguarding hub within PVP, with other investigative teams benefiting from their safeguarding expertise
  - Improve Northamptonshire Police's response to vulnerability
  - Provide the public of Northamptonshire with the most effective and efficient PVP Department possible.

High-risk, multi-agency processes were moved to sit within the MASH (with the exception of Child Sexual Offences Disclosure Scheme (CSODS) and Multi-Agency Risk Assessment Conference (MARAC). The moving of the CSODS process and the MARAC staff and process is currently underway.
2. Four additional full-time resources have been allocated to the MASH as part of the review of the PVP Command. These changes will enable the organisation to:
  - Provide a better quality of service.
  - Work in effective partnerships.
  - Release capacity.
  - Greater focus on early Prevention and intervention.
3. The four 'Matters of Priority' embrace protecting the most vulnerable in our communities informed by feedback from our communities:
  1. Violence against women and girls (VAWG)
  2. Drug harm
  3. Serious and organised crime
  4. Serious violence.
4. The police response to Domestic Abuse (DA) was reviewed and a revised structure to the specialist Domestic Abuse Investigation Unit (DAIU) were trialled, found to be effective, and are being made permanent.

Domestic Abuse Investigation Champions were re-established on the Local Police Areas (LPAs) to ensure DA-related communications were delivered effectively to frontline officers to ensure changes in policy/procedure/legislation are promptly disseminated, understood and embedded.

The Force's Crime Allocation Policy has made clear the division for ownership to DA investigations, providing a more prompt, streamlined response to safeguarding and investigations.
5. Op Motto continues and centres around a dedicated, deployable resource in the control room. This resource is comprised of a crisis IDVA (Independent Domestic Violence Advisor) and a police officer, available at peak times (Friday and Saturday evenings), who deploy to scenes of High-Risk DA/repeat victims where the perpetrator has been removed. This project has been extended.
6. Serious and Organised Crime (SOC) remains a 'Matter of Priority' for the force. A new Sex Worker Profile has been compiled and will be used to provide safeguard interventions and target offenders who exploit for gain.
7. Op Uncanny continues, the operation involves Northants Police actively engaging with Sex workers. This is a multi-agency sex worker engagement approach which disrupts kerb crawlers and allows engagement with some of the most vulnerable persons in our community, building trust and confidence, also using the opportunity to provide safety advice, but also enforce offences.
8. Op Kayak (pro-active operation to intervene, disrupt, prevent and enforce offences for predatory behaviour and offending in the NTE), officers are deployed to areas that sex workers are located to continue the good work of Op Uncanny. We also have internal and external vlogs around this subject matter.
9. Investigating Crime is an area of strength for Northamptonshire Police. Good work takes place, particularly in the form of thorough Officer training, an exceptional Justice Department and robust auditing via the Senior Officer Reviews. There are many similarities in what we do compared to other forces who have been graded as good by HMICFRS in their PEEL inspections.
10. Northamptonshire Police have several audits schemes to facilitate internal scrutiny of crime investigation standards. These include the Senior Officer Reviews, Vulnerability Audits and the wide range of work completed by the Performance Development Page 118 assurance.

# Working in Partnership – Our Key Statutory Partners

## Northamptonshire Police - Areas for Development in 2023-24

1. Senior Officer audits of DA, Modern Slavery & Human Trafficking and SOC are planned for the upcoming year to ensure we improve our service to victims and pursuit of perpetrators.
2. Seek support from partner agencies to implement a co-located adult MASH to ensure that there is parity between the support given to vulnerable adults needing safeguarding in our county, as there is children.
3. Embed Operation Soteria Operating Model – this is a home office funded/NPCC led project to review and create a national operating model for rape and serious sexual offences, it is planned on being launched nationally in June 2023. Northants Police are currently reviewing their working practices in line with the research and will look to embed the working practices in force during 2023.
4. Violence against Women and Girls – VAWG – this is a matter of priority for Northants Police, and we will continue to embed our approach under the 3 pillars: build trust and confidence, relentless perpetrator pursuit and safer spaces.
5. Improving outcome ratios (formal criminal sanctions).
6. Improving response times to domestic abuse incidents.
7. Clinical Supervision to be introduced to all staff conducting high harm roles within Northamptonshire Police. Their wellbeing and welfare must be a priority.
8. Evaluation of the changes to MASH and OCAIU to be made – further demand profiling to be completed if necessary.
9. The National Vulnerability Action Plan to be adopted in force and used as a tool to collate relevant information and horizon scan for gaps.
10. The Observatory - This system should produce a strategic product of case studies, to physically evidence and demonstrate its deliverables, benefits and how it will be used once live (Recommendation 7 in the PAF 12 report, 2023).



# Working in Partnership – Our Key Statutory Partners

## West Northamptonshire Council - Adult Social Care - Achievements in 2022-2023

1. The Adult Risk Management (ARM) Oversight Panel was well attended throughout 2022 – 2023. The development of the Panel has seen a reduction in the numbers being raised at Panel.
2. Making Safeguarding Personal (MSP) – This has been an area for audit during the year. The safeguarding audit of 32 concerns/enquiries identified that 81% of people were spoken to at the start of the enquiry. 88% were given feedback on outcomes and 66% had a clear outcome and plan identified following the enquiry. A safeguarding policy, procedure and practice guidance has been implemented and throughout the process MSP is key.
3. Joint working continues with Quality colleagues internally and externally at the Quality Board. Internal Quality and Safeguarding meetings allow us to have a more holistic view of the provider market and joint working is undertaken to improve information sharing through data.
4. The Principal Social Worker (PSW) role has been pivotal in the development of practice. Also key to the review of the Target Operating Model (TOM), working with regional peers to put in place practice standards and development of an assurance framework. The recruitment of two Quality Assurance Social Workers has led to internal audits and the PSW has developed practice standards for all to work to.
5. A composite action plan is in place to coordinate learning from both internal audit and external, for example LeDeR and SAR's, across Adult Social Care.
6. Development of the assurance framework has this year included the setting up of Performance Board, the implementation of audits, development of practice guidance and importance of feedback and co-production.

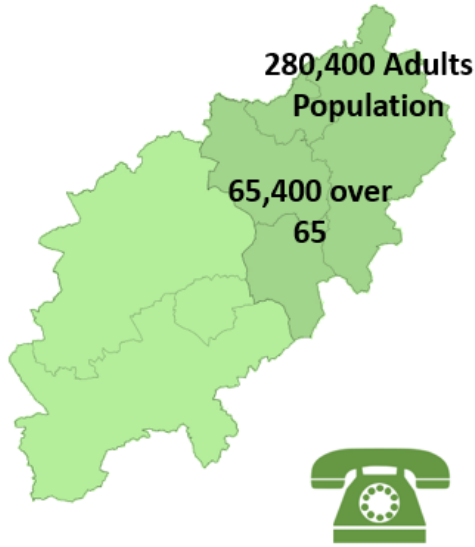
## West Northamptonshire Council - Adult Social Care - Areas for development in 2023-2024

1. Implementation of the internal Safeguarding policy, procedure and practice guidance and audits of safeguarding practice to ensure consistency across teams.
2. To work with all our partners on the implementation of the new Decision-Making Framework to make sure we have robust and consistent decision making around safeguarding concerns.
3. To work with partners to increase the rate of conversion to enquiry by ensuring concerns are appropriate and pathways for support are clear.
4. Implementation of key actions from the self-assessment across ASC to ensure that standards are embedded that meet the CQC framework for local authorities.
5. Increase opportunities for feedback in safeguarding process.
6. Review of current ARM oversight process.
7. Implementation of a new case recording system supports improvements in the quality of data available, which subsequently supports decision making and service planning .
8. Support with changes to the website so referral routes are clear.
9. To review the SA1 (safeguarding concern) to ensure that it is clear what information is required to support the safeguarding process and timely decision making.
10. To develop our approach to transitional safeguarding through the Moving into Adulthood (MIA) process.
11. Introduce a pro-active approach to how we work with partners where data and intelligence identifies the greatest risk to peoples safety and wellbeing.

***We are very grateful to all statutory partners who provided dedicated officers to support the work of NSAB at Strategic and Delivery Boards, and Sub Groups, and the various Task & Finish Groups throughout the year.***

# Northamptonshire Safeguarding Adult Return Statistics

## North Northamptonshire Council

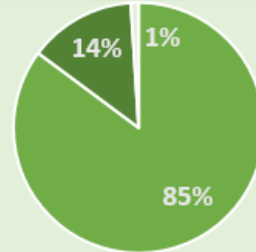


**3,792** concerns raised

**2,990**  
remained Alerts

**802**  
became Enquiries

**85%** (796) of enquiries had Provider as the 'Source of Risk'



Other options - Known to Individual 14% and unknown to Individual 1%

**41%**  
Male

**59%**  
Female

The enquiry subject was frequently of the female gender

### Subject age band of the enquiry:

18-64  
**33%**

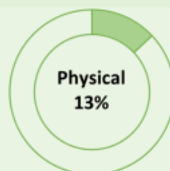
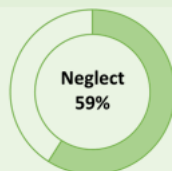
65-74  
**13%**

75-84  
**21%**

85-94  
**27%**

95+  
**6%**

59% of abuse types recorded for enquires was Neglect and Acts of Omission.



Risk Remains  
**5%**

Risk Reduced  
**79%**

Risk Removed  
**16%**

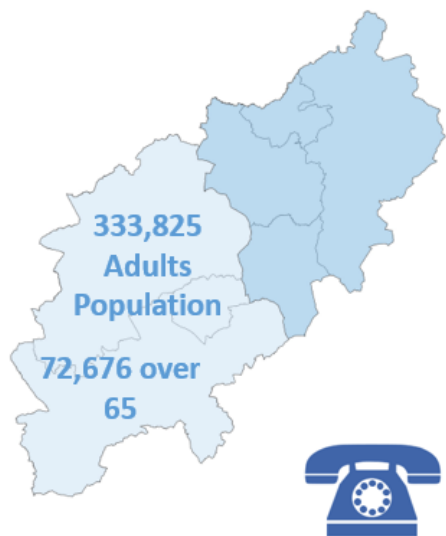
Following investigation, **95%** identified with risk had their risk removed or reduced

\*Adults population based on Census 2021 estimates ages 18+



# Northamptonshire Safeguarding Adult Return Statistics

## West Northamptonshire Council



**6,345** concerns raised

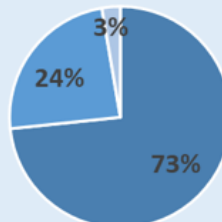
**4075**

64%  
remained Alerts

**2270**

36%  
became Enquiries

**73%** (1638) of enquiries had Provider as the 'Source of Risk'



Other options- Known to Individual 24% and unknown to Individual 3%

**49%**

Male

**51%**

Female

The enquiry subject was frequently of the female gender

### Subject age band of the enquiry:

18-64

**48%**

65-74

**11%**

75-84

**18%**

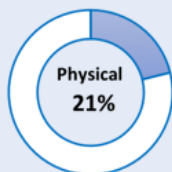
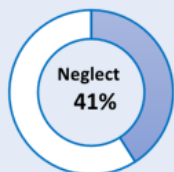
85-94

**19%**

95+

**4%**

41% of abuse types recorded for enquires was Neglect and Acts of Omission.



Risk Remains  
**8%**

Risk Reduced  
**71%**

Risk Removed  
**21%**

Following investigation, **92%** identified with risk had their risk removed or reduced

\*Adults population based Census 2021 estimates that classify usual residents in England and Wales by sex, and by age. The estimates are as at Census Day, 21 March 2021

# Strategic Plan 2021-23 – Progress

The Strategic Plan 2021-23 was built on the previous plan 2018-20 and structured according to NSAB’s vision, the six key principles (as set out by the government in the Care Act 2014 statutory guidance), local and national priorities.

Board priorities for 2022-23:

1. Making Safeguarding Personal
2. Prevention
3. Quality

NSAB themes for 2022-23:

1. Raising Awareness of NSAB and Safeguarding
2. Learning from Safeguarding Adult Reviews
3. Understanding the Impact of Covid-19
4. The Difference NSAB Makes
5. Homelessness

## Priority 1 - Making Safeguarding Personal

- a. Work together as a Board to provide local leadership on safeguarding adults to ensure people are safe, particularly during the period of transition from the County Council to the new Unitary Authorities. **Achieved**
- b. Continuously learn and develop as the NSAB to ensure the Board’s key priorities and objectives are delivered by the partnership. **Achieved**
- c. Ensure appropriate membership is at the right level for Board and Sub Groups and engagement is appropriate to drive business. **Achieved**
- d. Ensure users and carers are supported in their role in keeping people safe, and they help to evaluate the effectiveness of safeguarding adults within Northamptonshire. **Ongoing activity**

## Priority 2 – Prevention

- a. Enable and support local communities to play their role in keeping people safe by improving communication to raise awareness of key safeguarding messages. **Achieved**
- b. Ensure learning from national and local multi-agency reviews and reports are shared and implemented locally. **Achieved**
- c. Ensure learning and development opportunities are available to the voluntary sector. **Achieved**

## Priority 3 - Quality

- a. Ensure statutory responsibilities for a safe and legal transfer to the new Unitary Authorities is in place, and that customers are not adversely affected by the change. **Achieved**
- b. Mitigate risks flagged on the NSAB Risk Register. **Achieved**
- c. Ensure effective analysis and response to partnership data. **Ongoing activity**
- d. Ensure Board have oversight of partners’ use of resources to meet the demands to meet quality standards. **Achieved**
- e. Ensure NSAB multi-agency policies and procedures are reviewed in a timely manner. **Ongoing activity**

## Income and Expenditure 2022-2023

Statutory partners contribute financially to NSAB's operating expenditure as well as providing 'in kind' resources such as meeting venues and their officers' valuable time and expertise.

| <b>Income</b>   | <b>2022-23<br/>£</b> |
|---|----------------------|
| Carry forward from 2021-22 includes Covid-19 COMF funding | 40,540               |
| NHS Northamptonshire Integrated Care Board                | 38,424               |
| North Northamptonshire Council                            | 38,424               |
| Northamptonshire Police                                   | 38,424               |
| West Northamptonshire Council                             | 38,424               |
| <b>Total Income</b>                                       | <b>194,236</b>       |

| <b>Expenditure</b>                               | <b>2022-23<br/>£</b> |
|--|----------------------|
| Staffing   | 93,841               |
| Independent Chair                                | 13,957               |
| Safeguarding Adult Reviews (SAR) Reviewer costs  | 21,716               |
| Legal costs associated with SARs                 | 7,843                |
| Marketing and print - #ReportIt campaign         | 263                  |
| Learning and Development – Multi-agency training | 1,230                |
| Office costs                                     | 1,188                |
| Strategic planning costs                         | 628                  |
| <b>Total Expenditure</b>                         | <b>140,666</b>       |

Northamptonshire   
Safeguarding Adults Board





## EXECUTIVE 16<sup>th</sup> November 2023

|                      |  |
|----------------------|--|
| <b>Report Title</b>  | <b>North Northamptonshire Local Development Scheme</b>               |
| <b>Report Author</b> | Graeme Kane – Executive Director of Place and Economy (Interim)      |
| <b>Lead Member</b>   | Cllr David Brackenbury, Executive Member for Growth and Regeneration |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

#### Appendix A – Draft Revised Local Development Scheme

##### **1. Purpose of Report**

---

- 1.1. This report seeks a resolution from the Executive to adopt the North Northamptonshire Local Development Scheme.

##### **2. Executive Summary**

---

- 2.1. The Council is required by legislation to prepare and publish a Local Development Scheme (LDS). An LDS is a project plan providing a timetable for the preparation of documents that make up the area's Development Plan. The first North Northamptonshire Council LDS, covering the period 2022-2025 was adopted on 31<sup>st</sup> March 2022 and it is now being revised to ensure that it is up to date.
- 2.2. The LDS provides detailed timetables for the Council's next programme of Development Plan Documents, and updates on the title and nature of the documents. This includes the North Northamptonshire Local Plan, a Gypsy and

Traveller Local Plan, and the remaining stages of the East Northamptonshire Local Plan Part 2. A review of policies making up the North Northamptonshire Minerals and Waste Local Plan is being considered and timeframes for this work are not yet proposed. On that basis this LDS only raises that a review of Minerals and Waste policies will be undertaken, but timeframes for such a review are not included in this version of the LDS. The LDS provides additional information regarding the preparation of Neighbourhood Plans.

- 2.3. The revised LDS is attached at **Appendix A**.

### **3. Recommendations**

---

- 3.1. It is recommended that the Executive agree the North Northamptonshire Local Development Scheme (LDS) for adoption.
- 3.2. Reason for Recommendations – To agree a timetable for the programme of plans identified in the LDS; and to ensure the Council meets its legal obligation to publish and maintain an up-to-date LDS, to meet its requirements as a local planning authority.
- 3.3. To ensure the Council meets its obligation under Section 15(1) of the 2004 Planning and Compulsory Purchase Act, to publish an up-to-date Local Development Scheme to meet its requirement as a local planning authority.
- 3.4. Alternative Options Considered – It is a statutory obligation for the Council to publish and maintain an up-to-date LDS, as such the Council needs to adopt a revised LDS. The Executive could, if it was minded to do so, ask officers to review the timeframes and present a further revision of the LDS in due course.

### **4. Report Background**

---

- 4.1. A Local Development Scheme (LDS) is a project plan setting out the timetable for the preparation of documents that in this case make up the North Northamptonshire Development Plan. The first North Northamptonshire Council LDS was adopted on 31<sup>st</sup> March 2022. This did not set out the approach and timetable for Minerals and Waste planning policy, formerly the responsibility of Northamptonshire County Council. Once an approach has been developed for how the Council should progress in preparing the North Northamptonshire Minerals and Waste Local Plan, and any other Development Planning Documents, then a further review of the LDS will be undertaken.
- 4.2. The Development Plan for North Northamptonshire is made up of the North Northamptonshire Joint Core Strategy (adopted July 2016); other area-based Local Plan policy documents; Part 2 Local Plans; the Northamptonshire Minerals and Waste Local Plan Update (adopted July 2017); and various Made Neighbourhood Plans. Once adopted, future Local Plans and Neighbourhood

Plans, prepared by Neighbourhood Plan Groups or Forums, will also form a part of the Development Plan.

- 4.3. Section 15(1) of the 2004 Planning and Compulsory Purchase Act requires that the “local planning authority must prepare and maintain a scheme to be known as their local development scheme”. Legislation simply requires that the LDS is brought into effect and published by the Local Planning Authority. To achieve this, two actions need to be carried out:
  - i. the Council should resolve that the LDS is to have effect; and
  - ii. it should specify the date from which the LDS is to have effect.
- 4.4. The Council’s constitution requires that the LDS be adopted by Full Council. As such, it is proposed that Members of the Executive consider the content before resolving to adopt the LDS. The Council will continue to update on the progress being made with its plan-making on its website, as appropriate.

## **5. Issues and Choices**

---

- 5.1. The purpose of the LDS is to provide a timetable against which the documents making up the Council’s Development Plan can be viewed, allowing any parties interested in taking part in the preparation of the Plan to be notified of the programme and to be involved in its development.
- 5.2. It is considered important to ensure the Council is complying with the necessary tests, by agreeing and publishing a revised LDS.
- 5.3. Officers have reviewed the LDS, including the scope of Local Plans within it and the timetable for preparation, taking account of resources, consultation feedback and the context of reforms to the planning system.

### **Planning reforms and transitional arrangements**

- 5.4. Plan-making is taking place within the context of significant reform to the planning and plan-making system, which are set out in the document: Levelling Up and Regeneration Bill, with more detail provided in the “Levelling-up and Regeneration Bill: reforms to national planning policy consultation December '22 March '23”. The latest consultation on this subject closed on 18<sup>th</sup> October 2023, entitled “Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms”.
- 5.5. The Levelling-up and Regeneration Bill sets out reforms to the local plan-making system. In summary, the Government intends that Plans will be produced more quickly and the content of plans will be simplified. The Government considers that this will result in a more effective system that is easier to engage with for stakeholders. Subject to parliamentary approval, it is anticipated that the plan-making reforms are to be implemented from late 2024.

- 5.6. Significantly, the Bill sets out that each local planning authority must prepare a local plan and an express restriction that only one local plan may have effect in relation to a local planning authority's area at one time. The local plan can be supplemented by the preparation of Supplementary Plans.
- 5.7. National Development Management Policies are also proposed to aid future plan-making. These policies would be given the same weight in certain planning decisions as policies in local plans, neighbourhood plans and other statutory plans (and could, where relevant, also be a material consideration in some planning decisions, such as those on Nationally Significant Infrastructure Projects). It is the Government's intention that National Development Management Policies would cover planning considerations that apply regularly in decision-making across England or significant parts of it, such as general policies for conserving heritage assets, and preventing inappropriate development in the Green Belt and areas of high flood risk.
- 5.8. The Bill would preclude new plans from including policies which duplicate or are inconsistent with National Development Management Policies. This would ensure that there is a clear demarcation between locally prepared plans and national policy, minimising any risk of conflict between them. The Bill also provides that National Development Management Policies would take precedence where there is conflict between them and development plan policies when making a decision on a planning application.
- 5.9. The "Levelling-up and Regeneration Bill: reforms to national planning policy consultation" document provided further information on transitional arrangements. It stated that the reformed plan-making system is intended to be introduced in late 2024. In the meantime, the Government recognises the importance of ensuring that as many authorities as possible can take advantage of the policy changes outlined in this wider document, which at the time of publication were expected to take effect from Spring 2023, indicating risks of delay and uncertainty. The document further explained that the intention was to ensure that plans can progress in the short term, which will allow land for development to continue to come forward and help to smooth the transition to the new plan making system. Authorities with an up-to-date local plan in place will be in the best possible position to adapt to the reforms provided for in the Bill.
- 5.10. The Government is proposing that plan makers will have until 30 June 2025 to submit their local plans, neighbourhood plans, minerals and waste plans, and spatial development strategies for independent examination under the existing legal framework; and in the meantime, existing legal requirements and duties, for example the Duty to Cooperate, will still apply.
- 5.11. Consultation on revisions to the National Planning Policy Framework (NPPF) (Dec '22-March '23) proposed the removal of the "justified" test of soundness which requires that plans must provide "an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence". Plan makers will still need to produce evidence to inform the plan, and to satisfy requirements for environmental assessment, but the Government considers

that removing the explicit test that plans are 'justified' is intended to allow a proportionate approach to examination, in light of these other evidential requirements.

- 5.12. Despite the anticipated timetable for reforms, the Government has yet to publish its response to the consultation on measures discussed above, including finalising transitional arrangements. The Department for Levelling Up, Housing and Communities (DLUHC) has confirmed that NPPF revisions will be delayed until at least after the Levelling Up and Regeneration Bill is passed and become an Act of parliament. Officers have considered the measures set out in revising the LDS and the process and timetable for plan preparation and sought to develop an approach that future-proofs the Council.

### **Local Development Scheme**

#### **North Northamptonshire Local Plan**

- 5.13. Members will be aware that the Joint Core Strategy is the strategic Part 1 Local Plan for North Northamptonshire, providing strategic allocations and the strategic direction for development across the wider area. The adopted LDS sets out that the Joint Core Strategy would be reviewed/updated through the North Northamptonshire Strategic Plan which would focus on strategic matters which would, as a minimum, meet the requirement set out in the NPPF, to have a plan that addresses the strategic priorities for the area. Consultation on Scope and Issues was undertaken March-May 2022, and was reported to the Planning Policy Executive Advisory Panel on 14th December 2022.
- 5.14. Approaches to progressing local plans in North Northamptonshire were discussed at internal workshops with policy officers and Members between March and June 2023. Three options were considered:
- Option 1: Progress as per adopted LDS and continue to prepare North Northamptonshire Strategic Plan.
  - Option 2: Prepare one North Northamptonshire Local Plan, incorporating the Gypsy and Traveller Local Plan.
  - Option 3: Broaden the scope of the Strategic Plan and rename as the North Northamptonshire Local Plan but continue to prepare a separate Gypsy and Traveller Local Plan.
- 5.15. It was concluded that the preferred approach based upon various factors was Option 3, that being to broaden the scope and rename it North Northamptonshire Local Plan and prepare a separate Gypsy and Traveller Local Plan.
- 5.16. The scope of the North Northamptonshire Local Plan will include strategic priorities that would have been covered in the Strategic Plan (which were set out in the Scope and Issues consultation document) and some non-strategic matters that are set out in the Part 2 Local Plans. This will allow for harmonisation and rationalisation of policy approaches and the opportunity to address any policy gaps that may exist. It is considered that this approach better future-proofs the Council to respond to planning reform, and the requirement

for one local plan. This approach has been informed by feedback to the Strategic Plan Scope and Issues consultation. It will be necessary to save certain policies in the Part 2 Local Plans. This approach is also likely to bring with it efficiencies and cost savings by reducing the need to invest in preparing several Part 2 Local Plans. These aspects of plan-making will however be looked at by the Council when reviewing Planning Reform.

- 5.17. The timetable for plan-making proposes removal of the Spatial Options consultation that was timetabled for September 2023. It is considered more prudent to focus resources on the development of a draft plan, with options developed and tested through the evidence base, notably the Sustainability Appraisal, informed by feedback to the Strategic Plan Scope and Issues consultation. Instead of the Options consultation, it is proposed to undertake workshops and targeted engagement on specific policy areas during the Autumn/Winter 2023, to inform the draft plan. Members will be kept informed of the proposed mechanisms for this ongoing engagement. It is considered that this approach represents a proportionate, robust approach that is consistent with national policy and will ensure resources are appropriately focused. There will be opportunity for comment and contributions through focused engagement on specific topics, helping to develop the approach for future stages of consultation, notably the draft plan.
- 5.18. A summary of the timetable for the North Northamptonshire Local Plan is provided below:
- Issues/scope Consultation - March 2022 (completed)
  - Draft Plan Consultation - June 2024
  - Publication Plan Consultation - January 2025
  - Submission to the Secretary of State - April 2025
  - Examination - October 2025
  - Inspector's Report - March 2026
  - Adoption - September 2026

### **Part 2 Local Plans**

- 5.19. Each of the sovereign authorities progressed their own Part 2 Local Plan policies for their areas. The Borough Council of Wellingborough adopted its Part 2 Plan in February 2019; the Part 2 Local Plan for Corby was adopted in September 2021; and the Part 2 Local Plan for Kettering was adopted in December 2021. The Part 2 Local Plan for East Northamptonshire was Submitted to the Secretary of State in March 2021. The Examination hearing sessions were held April-May 2022. Consultation on Proposed Modifications took place April-May 2023. The Planning Inspector provided her report during the summer, which led a report to the Planning Communities Executive Advisory Panel on 24<sup>th</sup> October 2023, and Executive on this same agenda. It is planned the Part 2 Local Plan will be presented to Full Council for adoption on 7<sup>th</sup> December 2023.

## **North Northamptonshire Gypsy and Traveller Local Plan**

- 5.20. The Planning Communities Executive Advisory Panel on 27<sup>th</sup> March 2023 endorsed changes to the Gypsy and Traveller Local Plan, including the name, scope, and timetable. Public consultation on the Scope and Options and associated Sustainability Appraisal Scoping Report followed between 5<sup>th</sup> April and 31<sup>st</sup> May 2023.
- 5.21. The projected timescale for the Gypsy and Traveller Local Plan endorsed by the Panel is set out below:
- Early stakeholder and community involvement - April 2023 (completed)
  - Draft Plan Consultation – March/April 2024
  - Publication Plan Consultation – November/December 2024
  - Submission to the Secretary of State – February 2025
  - Examination – September 2025
  - Inspector’s Report - December 2025
  - Adoption – March 2026
- 5.22. The above timetable is ambitious leaving little contingency to accommodate any issues which may arise during its preparation, causing its delay. However, the priority with which progress is sought shows a clear intent to address issues identified in meeting accommodation needs, and a desire to ensure that the need is met whilst providing standards acceptable for habitation such as space standards and amenity.
- 5.23. It is also acknowledged that local plan policy development may be necessary in other topic areas, including specific policies for our town centres. The LDS is only required to address timescales for Development Plan Documents, therefore only addresses the timescales for those Plans set out in this report. It should be noted that the timetable detailed for plan preparation above is just one element of the programme of work undertaken by the Planning Policy team. The preparation of the Local Plans in the LDS and accompanying documents will be demanding of staff resources, particularly while the planning function continues its transformation, bringing the five former local planning authorities together into a single service and following the Planning Advisory Service’s peer review.
- 5.24. Officers will monitor balancing priorities in plan-making against other policy priorities and activities including procurement of consultants, evidence base preparation, and consultation and engagement, all at a time of budget pressures nationally in local government, and significant and competing work demands. Further changes in staff or uncertainty caused by Planning Reform legislation and guidance will carry risks to the timetable outlined, but this will be kept in check as much as is possible to ensure the programme stays on track.
- 5.25. The implementation of proposed planning reform is still uncertain and has led to many local planning authorities across the country pausing plan-making. It

is considered that despite significant resource challenges and this uncertainty that it is important to progress plan-making in North Northamptonshire. It is however possible to review the LDS at a future date, although efforts will continue to ensure this does not change those programmes detailed within this report.

## **6. Next Steps**

---

- 6.1. The proposed revised draft LDS is attached at **Appendix A**. Members of the Executive are asked to review the LDS and resolve to adopt the document.

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

7.1.1. There are no specific resources or financial implications arising from this report. The plan-making work set out within the LDS will be resourced within the existing Planning Policy budget. A review of further resources will continue to be undertaken as part of the budget setting process to assess the appropriate level to support future requirements. The preparation of the Local Plans in the LDS and accompanying documents will be demanding of staff and resources and needs to be balanced with other policy priorities, in terms of procurement of consultants, evidence base preparation and consultation, at a time of budget pressures and significant and competing work demands. It will require careful resource management and collaborative working with other services within the Council, such as Environmental Health, Flood and Water Management, Highways, Public Health etc.

7.1.2. The Executive Director of Executive Director of Finance and Performance has been consulted, and there are no resource or financial implications arising from the proposals.

### **7.2. Legal and Governance**

7.2.1. The preparation and maintenance of an up-to-date LDS is required under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and Town and Country Planning (Local Planning) (England) Regulations 2012. Formulating the timetables within the LDS, keeping them up-to-date, and making it publicly available is also part of that legal requirement. The document will be accessible on the Council's website. The Council will also ensure it complies with the necessary tests in preparing a Local Plan for Examination. Members of the Planning Communities Executive Advisory Panel provide oversight and governance in preparing Local Plans.

7.2.2. Following a review of the Council's constitution and the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, it is recognised that the function of approving "Plans and alterations which together comprise the Development Plan" are not to be the sole responsibility of the Executive –



i.e. Full Council is the decision maker. However, “functions relating to local development documents which are not development plan documents are the responsibility of the executive of an authority.” Although the LDS is not itself a local development document, it actually sets out what documents are local development documents and therefore this would be an Executive decision as the LDS is not a Development Plan Document.

### **7.3. Relevant Policies and Plans**

7.3.1. The plans set out in the LDS will take forward relevant policies in the Corporate Plan and other relevant documents. In particular, the local plans for which the LDS sets out the timetable will deliver on the following corporate priorities: 1. Active, fulfilled lives; 2. Better, brighter futures; 3. Safe and thriving places; 4. Green, sustainable environment; and 5. Connected communities.

### **7.4. Risk**

7.4.1. The risk from setting out an LDS is often associated with that of slippage to those plans identified within it. Every effort has been made to be as realistic as possible, yet also challenge the programme in terms of progress. Causes of delay are varied but can include loss of key staff, including in other service areas who would support plan-making; time appointing consultant input; complexity of evidence; expansive consultation responses and complexity; planning reforms and subsequent uncertainty; competing priorities; to name but a few. It is also recognised that some issues of developing policy may need to be added to the LDS, the fact that these are not included within this one does not mean they cannot be added in the future, it just means a timetable has not been identified yet.

7.4.2. In March 2020, the Government set a ‘clear deadline’ of December 2023 for all authorities to have up-to-date Local Plans in place. The government can intervene in Local Plan processes where they consider there is a lack of progress being made, plans are out of date, or there are high housing pressures and intervention would have an impact. It is considered that the risk of this is very low in North Northamptonshire. There will be a package of up-to-date Part 2 Local Plans in place and substantial progress has been made in preparing the North Northamptonshire Local Plan through early public engagement and the gathering of evidence. A significant number of policies in the current Joint Core Strategy are still considered to be working effectively in the development management process.

7.4.3. There are risks, that any slippage in plan-making could mean 30<sup>th</sup> June 2025 submission deadline for the plan to be examined under the current planning system not being met. Government announcements in relation to planning reform will be monitored and considered accordingly. It is considered that whilst it is the clear intention for the plan to be progressed under the current planning system, any work on the plan would be capable of being adapted accordingly.

7.4.4. In terms of the Gypsy and Traveller Local Plan, the Council's consultants are currently preparing a Pitch Deliverability Assessment to respond to draft findings from initial work on a Gypsy and Traveller Accommodation Assessment. The scale of the work needed in this next area of work brings with it risks, potentially causing delays and challenges to the allocation of sites. The Council recognises that where need is found, it is a priority that it finds solutions to provide suitable accommodation to meet that need. The Council is committed to prioritising this area of work.

## **7.5. Consultation**

7.5.1. No consultation is necessary in agreeing an LDS, consultation is however a fundamental part in the development of each of the Development Plan Documents.

## **7.6. Consideration by Executive Advisory Panel**

7.6.1. The precise timetable for both the North Northamptonshire Local Plan and the Gypsy and Traveller Local Plan have received some small amendments since dates were presented to the Planning Communities Executive Advisory Panel. Members on this Panel will be made aware of the amendments made since the EAP and the reasons for them. At the meeting of the EAP on 19<sup>th</sup> July 2023, Members resolved that the LDS be advanced to Executive, and made the following comments:

- i. North Northamptonshire has a good record in plan-making;
- ii. The LDS is ambitious but was it achievable as resources within the team come under pressure, including from other projects not focussed on plan-making; and
- iii. The cumulative impact of development and the need for a balanced economy is important.

## **7.7. Consideration by Scrutiny**

7.7.1. Members of the Place & Environment Scrutiny Committee met on 31<sup>st</sup> October 2023 to discuss the Local Development Scheme, where an amended recommendation that the Executive be presented the Local Development Scheme for adoption, was agreed unanimously. Comments made by Members during discussion included: recognition that plan-making inevitably takes a long time and acknowledging that delays to progress is sometimes beyond the control of the local authority, the programme as set out was considered quite optimistic. Also, consultations should be open surveys, asking the public what they want for their area; Town & Parish Councils are important bodies for consultation, particularly in relation to the Gypsy & Traveller Local Plan; and Members indicated they look forward to the running of workshops to help frame the new Local Plan documents, and also await with interest agreement to a Local Development Scheme to address Minerals & Waste Local Plan matters.

Members acknowledged the current uncertainty and risks associated with the Government's changes to the planning system, and its timings.

- 7.7.2. In terms of discussions on other planning matters, green/ amenity spaces and trees were highlighted to be of particular value to communities and asked that policy specify the amenity space required for new dwellings; and it was highlighted that landscape buffers can often be useful when designing employment development alongside residential uses.

## **7.8. Equality Implications**

- 7.8.1. The commitment within the LDS to progressing the production of future planning policy documents, does not in itself have any direct equality implications and it has therefore been concluded that a full Equality Impact Assessment is not required.

## **7.9. Climate and Environment Impact**

- 7.9.1. There are no climate and environmental impacts arising from the LDS the purpose of which is to detail timetables for the Council's next programme of Development Plan Documents. However, climate change will be a fundamental consideration throughout the preparation of the Development Plan Documents, and Neighbourhood Plans, identified within the LDS. The local plans within the LDS will provide an opportunity to respond to the Council's Climate and Environment Emergency declared in July 2021. The Sustainability Appraisal, prepared in parallel with each stage of the Plans, will assess their impacts on climate change and its ability to minimise the contribution to climate change through appropriate mitigation, and to support adaption measures to build resilience against the impacts of climate change in North Northamptonshire.

## **7.10. Community Impact**

- 7.10.1. The LDS itself as a timetable for the progress of the Council's Development Plan Document has limited direct community impact, but the Development Plan Documents do. Consultation with the community will be a significant part of the development of those documents.
- 7.10.2. The development of these plans will seek to ensure that existing and new communities in North Northamptonshire see tangible benefits from development. Consultation and the evidence base to inform planning policy, will help inform the approach and how benefits can be maximised.

## **7.11. Crime and Disorder Impact**

- 7.11.1. The LDS will not in itself have any impacts on crime and disorder however, the Development Plan Documents emerging from the timetable set out in the LDS will set out policies to ensure safe communities and development.

Consultation feedback will inform the approach to these elements as the plans are developed.

## **8. Background Papers**

---

- 8.1. Place and Environment Scrutiny Committee – North Northamptonshire Local Development Scheme (31<sup>st</sup> October 2023)  
<https://northnorthants.moderngov.co.uk/documents/g1865/Public%20reports%20pack%2031st-Oct-2023%2019.00%20Place%20and%20Environment%20Scrutiny%20Committee.pdf?T=10>
- 8.2. Planning Communities Executive Advisory Panel – North Northamptonshire Local Development Scheme (July 2023)  
<https://northnorthants.moderngov.co.uk/documents/g1707/Public%20reports%20pack%2019th-Jul-2023%2010.00%20EAP%20Planning%20Communities.pdf?T=10>
- 8.3. Planning Communities Executive Advisory Panel - Planning Policy Work Programme (January 2023)  
<https://northnorthants.moderngov.co.uk/documents/s14135/Report2%20-%20Planning%20Policy%20Work%20Programme.pdf>
- 8.4. North Northamptonshire Local Development Scheme (March 2022)  
<https://www.northnorthants.gov.uk/planning-strategies-and-plans/local-development-scheme-2022-2025>

# North Northamptonshire Council

## Local Development Scheme (LDS)

2023 - 2026

*Adoption version at Executive  
16 November 2023*



**North  
Northamptonshire  
Council**

# Contents

|   | Page No   |
|---|-----------|
| <b>1: Introduction</b>  | <b>2</b>  |
| <b>2: North Northamptonshire Development Framework- Current Position</b>  | <b>3</b>  |
| Development Plan Documents  | 3         |
| Other Development Framework Documents   | 3         |
| Related Strategies  | 3         |
| <b>3: Development Plan Documents – Future Position</b>  | <b>4</b>  |
| North Northamptonshire Joint Core Strategy  | 4         |
| East Northamptonshire Local Plan Part 2   | 4         |
| North Northamptonshire Gypsy and Traveller Local Plan   | 4         |
| Other Development Plan Documents  | 5         |
| Neighbourhood Plans   | 5         |
| <b>4: Other Documents</b>   | <b>6</b>  |
| Statement of Community Involvement  | 6         |
| Community Infrastructure Levy and Section 106 Agreements  | 6         |
| Supplementary Planning Documents  | 6         |
| North Northamptonshire Council Monitoring Report  | 6         |
| Strategic Environmental Assessment and Sustainability Appraisal   | 7         |
| <b>5: Delivery and Implementation</b>   | <b>8</b>  |
| Resources   | 8         |
| Risk Assessment   | 8         |
| Monitoring and Review   | 10        |
| <b>Appendix 1: Summary Schedule of Proposed Development Plan Documents</b>  | <b>11</b> |
| <b>Appendix 2: North Northamptonshire Local Plan: Document details, timetable and arrangements for production</b>                     | <b>12</b> |
| <b>Appendix 3: North Northamptonshire Gypsy and Traveller Local Plan: Document details, timetable and arrangements for production</b> | <b>13</b> |
| <b>Appendix 4: East Northamptonshire Local Plan Part 2: Document details, timetable and arrangements for production</b>               | <b>14</b> |
| <b>Appendix 5: North Northamptonshire Policies Maps: Document details and arrangements for production</b>                             | <b>15</b> |

# 1 Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) requires local planning authorities to prepare, maintain and publish a Local Development Scheme (LDS). The purpose of the LDS is to enable the local community to identify the timetable for the preparation of planning documents prepared in their area. This will be the second LDS prepared by North Northamptonshire Council, the first was adopted in March 2022.
- 1.2 This LDS covers a three-year period and sets out details of the Development Plan Documents (DPDs) that North Northamptonshire Council intends to produce, and the timetable for their production. It also includes an assessment of the roles and responsibilities of those involved in their production; a reflection on the relationship with Neighbourhood Plans and other documents; and an assessment of risks and contingencies as part of the programme to adoption.
- 1.3 The content of documents within LDS will be kept up-to-date on the Council's website to allow local communities and other interested parties to keep track of the Council's progress, aware of critical phases of plan preparation, and alert to when the key stages will occur.

## **2 North Northamptonshire Development Framework – Current Position**

2.1 The North Northamptonshire Development Framework currently comprises the following:

### **Development Plan Documents**

- North Northamptonshire Joint Core Strategy (JCS) (Part 1 Local Plan) - adopted July 2016
- Part 2 Plan for the Borough Council of Wellingborough - adopted February 2019
- Part 2 Local Plan for Corby – adopted September 2021
- Site Specific Part 2 Local Plan for Kettering Borough –adopted December 2021
- Kettering Town Centre Area Action Plan - adopted July 2011
- Rural North, Oundle and Thrapston Plan – adopted July 2011
- Northamptonshire Minerals and Waste Local Plan Update – adopted July 2017
- Saved Policies from the East Northamptonshire District Local Plan – adopted 1996 – November 2015 (to be replaced by the East Northamptonshire Local Plan Part 2)
- Northamptonshire Minerals and Waste Local Plan Update - adopted July 2017

### **Other Development Framework Documents**

- North Northamptonshire Statement of Community Involvement – adopted 28<sup>th</sup> July 2022
- North Northamptonshire Annual Monitoring Report – published annually
- Other local plan specific Annual Monitoring Reports for Development Plan Documents – published annually
- North Northamptonshire Local Development Scheme (this document)

2.2 The preparation of new documents will bring with it the need to review and update the content of this LDS, however, changes to the content of documents or minor alterations to supporting mechanisms will not necessarily demand a review.

### **Related Strategies**

2.3 The Council’s Corporate Plan approved by Full Council on 1<sup>st</sup> December 2021 will influence Local Plans prepared by the Council alongside any other relevant documents.



### **3 Development Plan Documents – Future Position**

#### **North Northamptonshire Joint Core Strategy**

- 3.1 The North Northamptonshire Joint Core Strategy (JCS) was adopted in July 2016 and will cover the period 2011-2031. It was prepared by the North Northamptonshire Joint Planning Unit and adopted by the North Northamptonshire Joint Planning Committee. The JCS is the strategic Part 1 Local Plan for the area, providing strategic allocations and the strategic direction for development across the North Northamptonshire area.
- 3.2 The Joint Core Strategy will be reviewed/updated through the preparation of what will be called the North Northamptonshire Local Plan. The Plan will address strategic matters which will, as a minimum, meet the requirement set out in the National Planning Policy Framework, to have a plan that addresses the strategic priorities for the area and some non-strategic matters that are set out in Part 2 Local Plans. This will allow for harmonisation and rationalisation of policy approaches and the opportunity to address any policy gaps that may exist. It is proposed that the statutory plan period should be 2021-2041, with a longer-term vision for achieving sustainable growth set out beyond this period.

#### **East Northamptonshire Local Plan Part 2**

- 3.2 The East Northamptonshire Local Plan Part 2 is a legacy document in its final stages of preparation, planned for adoption by North Northamptonshire Council. All the Part 2 Local Plans are intrinsically linked with the North Northamptonshire Joint Core Strategy, to read as one Local Plan.
- 3.3 The Part 2 Local Plan for East Northamptonshire was Submitted to the Secretary of State in March 2021. The Examination hearing sessions were held in April-May 2022 and following receipt of the Inspector's report the plan is expected to be adopted in December 2023.

#### **North Northamptonshire Gypsy and Traveller Local Plan**

- 3.4 The North Northamptonshire Gypsy and Traveller Local Plan will set planning policies and site allocations to meet the identified needs for Gypsy and Travellers and ensure high standards of design, development and living conditions. A Gypsy and Traveller Accommodation Assessment (GTAA) for North Northamptonshire was published in March 2019. Specialist consultants have been appointed to update the GTAA and to prepare a Pitch Deliverability Assessment which will identify options for meeting provision, this could include existing site extensions, site intensifications, potential enforcement of sites occupied by non-travellers, and new site provision.
- 3.5 Public consultation on the Scope and Options and associated Sustainability Appraisal Scoping Report took place between 5 April and 31 May 2023. The projected timescale for the North Northamptonshire Gypsy and Traveller Local Plan proposes consultation on a Draft Plan in March/ April 2024.

## **Other Development Plan Documents**

- 3.6 Once an approach has been developed for how the Council should progress in preparing the North Northamptonshire Minerals and Waste Local Plan, and any other Development Planning Documents, then a review of this LDS will be undertaken.

## **Neighbourhood Plans**

- 3.7 The Localism Act 2011 introduced rights and powers to enable communities to get directly involved in planning for their area. Neighbourhood planning allows communities to come together through a parish council or formal neighbourhood forum and produce a neighbourhood plan. Neighbourhoods can decide what they want to consider in their neighbourhood plans. They may allocate land for development or influence the type and design of development that comes forward. Neighbourhood plans must however be in general conformity with National Policy and the strategic planning policies already adopted by the Council. They should not promote less development than that set out in the Local Plan or undermine its strategic policies. They are also subject to an independent Examination and need to be approved by a majority vote in a local Referendum, before they can be Made (adopted).
- 3.8 North Northamptonshire Council has a large number of “made” neighbourhood plans within its area, and a significant number of plans at various stages in their preparation. The Council will continue to support Neighbourhood Plan Groups in the preparation of their Plans.
- 3.9 Any further “made” Neighbourhood Plans will also form a part of the Development Plan and will be used to assess and determine planning applications within the Plan’s designated area.

## **4. Other Documents**

### **Statement of Community Involvement**

- 4.1 The North Northamptonshire Statement of Community Involvement (SCI), adopted on 28<sup>th</sup> July 2022 was the first to be adopted by North Northamptonshire Council. It sets out the programme of community engagement in the preparation of local planning documents, minerals and waste matters and in considering planning applications for the area. It also sets out how the community can become involved in influencing Local Plans and planning applications ranging from minor development proposals such as house extensions, to major housing, employment and retail schemes, and to minerals and waste plans and applications.

### **Community Infrastructure Levy and Planning Obligations**

- 4.2 The Community Infrastructure Levy (CIL) is a standard pre-set charge which local planning authorities are empowered, but not required, to charge on all new developments over a minimum size. However, planning obligations through S106 Agreements remain a key means for ensuring that developments pay for infrastructure to make a development proposal acceptable in planning terms. None of the previous sovereign authorities prepared a CIL levy for their areas. The Government has resolved to remove pooling restrictions previously imposed limiting 5 planning obligations towards a single piece of infrastructure. Further guidance on these topic areas was published by the Government on 2<sup>nd</sup> September 2019, and further reforms to CIL through an Infrastructure Levy were consulted on between March and June 2023. The Council will continue to monitor the situation regarding implementation of the Infrastructure Levy before determining any further actions necessary.

### **Supplementary Planning Documents**

- 4.3 Supplementary Planning Documents are not required to be identified in the Local Development Scheme. It is however worth noting that a number of Supplementary Planning Documents have been adopted on a former area-wide basis, largely by the former sovereign authorities.

### **North Northamptonshire Council Monitoring Report**

- 4.4 A North Northamptonshire Council Monitoring Report to measure progress made in delivering the policies contained within the Joint Core Strategy will continue to be published. Monitoring reports previously published by the former sovereign authorities on their various Development Plan Documents will continue to be reported annually. These reports all measure the effectiveness of adopted policies within specific Development Plan Document.

## **Strategic Environmental Assessment and Sustainability Appraisal**

- 4.5 Achieving sustainable development is at the heart of the National Planning Policy Framework (NPPF) and planning system in general. Development Plans must be in general conformity with the NPPF. Therefore, the proposed Development Plan Documents will have to be subject to a Sustainability Appraisal (incorporating a Strategic Environmental Assessment). This will ensure that the social, economic and environmental effects of policies and allocations are understood, and fully taken into consideration. This is particularly important in the appraisal of reasonable options.
- 4.6 Development Plan Documents must also comply with the requirements of the European Community's Habitats Regulations on the conservation of natural habitats and of wild fauna and flora (Directive 92/43/EEC, May 1992). An Appropriate Assessment will be prepared for each Development Plan Document, and along with the Sustainability Appraisal, will be subject to testing at the Examination into the Plans.

## 5 Delivery and Implementation

### Resources

- 5.1 In preparing the Development Plan Documents, the Council's Planning Policy Team will lead in the production of each of the documents, with contributions from other service areas within the Council as and when required. It also recognises the need to use consultant expertise to assist in producing various elements of the technical background work. The service receives an annual budget to contribute to the costs of preparing the Development Plan Documents, it has also carried forward from previous years a Planning Reserve, which it draws from to cover the high costs necessary at specific periods of the plan-making cycle, in particular the costs incurred at Examination.
- 5.2 Following the formation of the new authority, a strategy of service transformation is being carried out, including within the Growth and Regeneration service area, in which the Planning Policy function sits. This LDS will be a reference point when considering how the service area is structured.
- 5.3 The Planning Policy team will continue to work with its partners on issues of delivery and implementation, including continued discussions with infrastructure delivery partners, developers, and seeking funding support from government bodies e.g. Department for Transport and Homes England.

### Risk Assessment

- 5.4 Production of the Development Plan Documents requires consideration of the potential risks involved in their preparation. In preparing this LDS, it was found that the main areas of risk relate to the following aspects:
  - **Staff turnover, retention and service restructure** – The Council officers will continue to work flexibly within the teams to ensure that resources are directed to areas where the greatest priorities require them. Plan preparation is a priority within the work programme. This will help to ensure that any loss of staff whilst positions are filled do not have a significant impact on timetables, although the service is currently carrying significant vacancies, which is adding pressure and limiting flexibility to respond. Service restructure can be positive in resetting the focus of work priorities, but it is recognised it can also be unsettling for staff. It should also be recognised there is a shortage of qualified experienced town planners in the marketplace.
  - **Access to support services** – The Council recognises the benefits of making all relevant information on the making of Plans available on its website. Ensuring documents are available to blind or partially sighted members of the community is accepted. Officers are seeking to ensure that all documents are available to view for all sectors of the community, without compromising legislation on accessible documents. In addition, the use of technology, including digital mapping (GIS) is of significant benefit

to the sharing of information, efforts will be made to ensure sufficient resource is made available to optimise this as a tool.

- **Duty to Cooperate** – The Council will engage with other authorities and organisations to ensure it satisfies the Duty to Cooperate and prepares a Statement of Common Ground.
- **Budget pressures** – The Council has identified a requirement to make quite significant efficiency savings over the coming years. It is reviewing how those savings can best be achieved, and the service maintained or improved. The Planning Policy function is expected to contribute towards these savings. Helpfully, the budget is regularly monitored to plan and project for any efficiency opportunities and potential unexpected additional costs likely to be incurred in producing the Development Plan Documents.
- **Capacity of the Planning Inspectorate (PINS)** – Advanced notification of timetables will be provided to the Planning Inspectorate to assist them in ensuring a suitable Inspector is available.
- **Developing the Plans at Planning Communities Executive Advisory Panel, and through Executive** – Officers work closely with all Members, but in particular the Executive Member for Growth and Regeneration. Effort is made to inform progress in preparing the Development Plan Documents, and that access to all the background information necessary to develop an understanding and foster a spirit of ownership of the content of the Plans is made readily available.
- **Soundness of the Plans** – The Council will seek to minimise any risk to the assessment of “soundness” by providing a clear evidence base, informing The Planning Inspectorate of the on-going process and working alongside the Council’s designated planning solicitor throughout the process.
- **Legal Challenge** – As above, and in addition as each Plan develops the Council will work closely with its designated planning solicitor to reduce the risk of a successful legal challenge. This is likely to require specialist legal advice.
- **Programme Slippage** – The timetables set are considered challenging but also achievable. To seek to reduce the risk of slippage, the programme will be regularly monitored, and contingencies explored to keep the timetables on track. There will be the potential for slippage caused by factors out of the Council’s control, but efforts will always be made to keep any slippage to an absolute minimum.
- **Planning Reform** – Clarity over the final set of planning reforms and other legislative changes remain uncertain, as does the timing and transitional arrangements. As such, officers will continue to monitor proposed reforms and respond to consultations when published. Officers will forecast these

changes to ensure the Council is prepared, and in the best position possible when changes are confirmed.

### **Monitoring and Review**

- 5.5 The North Northamptonshire Annual Monitoring Report will monitor the progress of the LDS on an annual basis, reporting by December each year. An annual monitoring report will be prepared to report on the delivery of policies for each of the Development Plan Documents once each document is adopted.
- 5.6 The LDS will be reviewed within a minimum of three years from the adoption of this document.

**Schedule of proposed Development Plan Documents to be prepared and agreed by North Northamptonshire Council**

| <b>Document title</b>                                 | <b>Status</b> | <b>Responsible authority</b> | <b>Brief description</b>   | <b>Chain of conformity</b>                                     | <b>Early stakeholder + community involvement</b>           | <b>Consultation on Publication Plan</b> | <b>Date for submission to S. of S.</b> | <b>Proposed date for adoption</b> |
|---|---------------|------------------------------|--|--|--|---|--|-----------------------------------|
| North Northamptonshire Local Plan                     | DPD           | NNC                          | Policy framework providing the strategic direction and allocations for North Northamptonshire  | To conform with National Policy                                | Issues & Scope March/May 2022<br>Draft June/July 2024      | January/February 2025                   | April 2025                             | September 2026                    |
| East Northamptonshire Local Plan Part 2               | DPD           | NNC                          | Policy framework containing land allocations and site-specific proposals for the former East Northamptonshire Council area   | To conform with the North Northamptonshire Joint Core Strategy | January/March 2017   | February/March 2021                     | March 2021                             | December 2023                     |
| North Northamptonshire Gypsy and Traveller Local Plan | DPD           | NNC                          | Planning policies and site allocations to meet the identified needs for Gypsy and Travellers and ensure high standards of design, development and living conditions. | To conform with National Policy                                | Early engagement April/ May 2023<br>Draft March/April 2024 | November/ December 2024                 | February 2025                          | March 2026                        |
| North Northamptonshire Council Policies Maps          | DPD           | NNC                          | Illustration of policies and proposals on ordnance survey base.  | To conform with all DPD documents                              | Continuously updated                                       |   |  |                                   |



**Title: North Northamptonshire Local Plan**

|   |  |  |
|---|--|--|
| <p><b>Document details</b></p>            | <p><b>Role and subject</b><br/>The North Northamptonshire Local Plan will provide the strategic framework for development and make allocations for the area. It will provide the strategy for development for the period 2021-2041, with the spatial vision for achieving sustainable growth extending beyond this.</p> <p><b>Geographical coverage</b><br/>The administrative unitary area of North Northamptonshire</p> <p><b>Status</b><br/>Development Plan Document</p> <p><b>Chain of conformity</b><br/>National Policy</p>   |  |
| <p><b>Timetable</b></p>                   | <ul style="list-style-type: none"> <li>- Early stakeholder and community engagement</li> <li>- Draft Plan for consultation</li> <li>- Publication consultation</li> <li>- Submission to S of S</li> <li>- Examination</li> <li>- Adoption</li> </ul>   | <p>March/May 2022</p> <p>June/July 2024</p> <p>January/February 2025</p> <p>April 2025</p> <p>October 2025</p> <p>September 2026</p> |
| <p><b>Arrangements for production</b></p> | <p><b>Organisation leading the process</b><br/>North Northamptonshire Council</p> <p><b>Management arrangements</b><br/>The North Northamptonshire Local Plan will be prepared, consulted upon, and managed by the Planning Communities Executive Advisory Panel, reporting into and adopted by the Executive.</p> <p><b>Resources required to produce the DPD</b><br/>Planning Policy Team, Growth and Regeneration<br/>Planning Policy budget<br/>Contributions from other service areas within the Council as and when required</p> <p><b>Approach to involving stakeholders and the community</b><br/>Refer to the North Northamptonshire Statement of Community Involvement July 2022</p> |  |

**Title: North Northamptonshire Gypsy and Traveller Local Plan**

|   |  |   |
|---|--|---|
| <p><b>Document details</b></p>            | <p><b>Role and subject</b><br/>The North Northamptonshire Gypsy and Traveller Local Plan, when adopted, will form part of the statutory North Northamptonshire Development Plan. This document will set planning policies and site allocations to meet the identified needs for Gypsy and Travellers and ensure high standards of design, development and living conditions.</p> <p><b>Geographical coverage</b><br/>The administrative unitary area of North Northamptonshire</p> <p><b>Status</b><br/>Development Plan Document</p> <p><b>Chain of conformity</b><br/>National Policy</p>  |   |
| <p><b>Timetable</b></p>                   | <ul style="list-style-type: none"> <li>- Early stakeholder and community engagement</li> <li>- Draft Plan for consultation</li> <li>- Publication consultation</li> <li>- Submission to S of S</li> <li>- Examination</li> <li>- Adoption</li> </ul>   | <p>April/ May 2023</p> <p>March/ April 2024</p> <p>November/ December 2024</p> <p>February 2025</p> <p>September 2025</p> <p>March 2026</p> |
| <p><b>Arrangements for production</b></p> | <p><b>Organisation leading the process</b><br/>North Northamptonshire Council</p> <p><b>Management arrangements</b><br/>The North Northamptonshire Gypsy and Traveller Local Plan will be prepared, consulted upon, and managed by the Planning Communities Executive Advisory Panel, reporting into and adopted by the Executive.</p> <p><b>Resources required to produce the DPD</b><br/>Planning Policy Team, Growth and Regeneration<br/>Planning Policy budget<br/>Contributions from other service areas within the Council as and when required</p> <p><b>Approach to involving stakeholders and the community</b><br/>Refer to the North Northamptonshire Statement of Community Involvement July 2022</p> |   |

**Title: East Northamptonshire Local Plan Part 2**

|   |   |   |
|---|---|---|
| <p><b>Document details</b></p>            | <p><b>Role and subject</b><br/>The East Northamptonshire Local Plan Part 2, when adopted, will form part of the statutory North Northamptonshire Development Plan. The document will cover the whole of the former East Northamptonshire District area with the exception of issues addressed in the Joint Core Strategy. The Part 2 Local Plan will include the identification of sites for housing, employment, recreation, green infrastructure and other land uses.</p> <p><b>Geographical coverage</b><br/>The administrative Unitary area of North Northamptonshire</p> <p><b>Status</b><br/>Development Plan Document</p> <p><b>Chain of conformity</b><br/>North Northamptonshire Joint Core Strategy</p> |   |
| <p><b>Timetable</b></p>                   | <ul style="list-style-type: none"> <li>- Early stakeholder and community engagement</li> <li>- Draft Plan for consultation</li> <li>- Publication consultation</li> <li>- Submission to S of S</li> <li>- Examination</li> <li>- Adoption</li> </ul>  | <p>Ongoing<br/>January/March 2017<br/>November 2018/February 2019<br/>February/March 2021<br/>March 2021<br/>April 2022<br/>December 2023</p> |
| <p><b>Arrangements for production</b></p> | <p><b>Organisation leading the process</b><br/>North Northamptonshire Council</p> <p><b>Management arrangements</b><br/>The East Northamptonshire Local Plan Part 2 will be prepared, consulted upon, and managed by the Planning Communities Executive Advisory Panel, reporting into and adopted by the Executive.</p> <p><b>Resources required to produce the DPD</b><br/>Planning Policy Team, Growth and Regeneration<br/>Planning Policy budget</p> <p><b>Approach to involving stakeholders and the community</b><br/>Refer to the North Northamptonshire Statement of Community Involvement July 2022</p>   |   |

**Title: North Northamptonshire Policies Maps**

|   |   |
|---|---|
| <p><b>Document details</b></p>            | <p><b>Role and subject</b><br/>The policies maps will illustrate on an Ordnance Survey base map all the policies and proposals contained in development plan documents and any saved policies. It will reflect the Key Diagram in the Joint Core Strategy, and it will contain Insets showing the proposals within specific areas (e.g. sites subject to development allocation; Part 2 Local Plans; Area Action Plans; or sites to which policies apply for protection and/or enhancement).</p> <p><b>Geographical coverage</b><br/>The maps will cover the administrative unitary area of North Northamptonshire.</p> <p><b>Status</b><br/>Development Plan Document</p> <p><b>Chain of conformity</b><br/>North Northamptonshire Joint Core Strategy</p> |
| <p><b>Timetable</b></p>                   | <p>The Policies Maps will be revised, where necessary, to reflect the up-to-date plan for the area whenever a Development Plan Document is adopted or a 'saved' policy ceases to be part of the Local Plan.</p>   |
| <p><b>Arrangements for production</b></p> | <p><b>Organisation leading the process</b><br/>North Northamptonshire Council</p> <p><b>Management arrangements</b><br/>The Proposals Maps will be prepared, consulted upon, and managed by the Planning Communities Executive Advisory Panel, reporting into and adopted by the Executive.</p> <p><b>Resources required to produce the DPD</b><br/>Planning Policy Team, Growth and Regeneration<br/>Support from Council's GIS team when required<br/>Planning Policy budget</p> <p><b>Approach to involving stakeholders and the community</b><br/>Refer to the North Northamptonshire Statement of Community Involvement July 2022</p>  |

**Summary of status of Neighbourhood Plans by progress date at September 2023**

| <b>Neighbourhood Plan by Area</b> | <b>Stage at June 2023</b>                       | <b>Next stage</b>      |
|-----------------------------------|---|------------------------|
| Corby Area                        |   |                        |
| <b>Central Corby</b>              | Area designated - 04.06.15                      | No further progress    |
| <b>Cottingham</b>                 | Plan 'Made' - 14.04.22                          | n/a                    |
| <b>Gretton</b>                    | Plan 'Made' - 22.06.21                          | n/a                    |
| <b>Stanion</b>                    | Area designated - 27.09.18                      | No further progress    |
| <b>Weldon</b>                     | Area designated - 27.02.17                      | Informal Plan drafting |
| East Northants Area               |   |                        |
| <b>Barnwell</b>                   | Plan 'Made' - 09.02.23                          | n/a                    |
| <b>Brigstock</b>                  | Plan 'Made' - 21.01.19                          | n/a                    |
| <b>Barrowden and Wakely</b>       | Plan 'Made' - 09.12.19                          | n/a                    |
| <b>Chelveston cum Caldercott</b>  | Plan 'Made' - 17.07.17                          | Review underway        |
| <b>Collyweston</b>                | Area designated - 09.05.16                      | No further progress    |
| <b>Deene and Deenethorpe</b>      | Area designated - 18.05.15                      | No further progress    |
| <b>Duddington with Fineshade</b>  | Pre-submission Consultation (Reg.16) - 22.09.23 | Examination            |
| <b>Glaphorn</b>                   | Plan 'Made' - 30.07.18                          | n/a                    |
| <b>Great Addington</b>            | Area designated - 08.04.20                      | Informal Plan drafting |
| <b>Hargrave</b>                   | Plan 'Made' - 25.08.22                          | n/a                    |
| <b>Higham Ferrers</b>             | Plan 'Made' - 11.04.16                          | Review underway        |
| <b>Irthlingborough</b>            | Area designated - 10.12.14                      | Informal Plan drafting |
| <b>Kings Cliffe</b>               | Plan 'Made' - 14.10.19                          | n/a                    |
| <b>Nassington</b>                 | Area designated - 07.01.21                      | No further progress    |
| <b>Oundle</b>                     | Examiners Report - 21.12.19                     | No further action      |
| <b>Raunds</b>                     | Plan 'Made' - 27.11.17                          | n/a                    |
| <b>Ringstead</b>                  | Plan 'Made' - 25.08.22                          | n/a                    |
| <b>Rushden</b>                    | Plan 'Made' - 04.06.18                          | Review underway        |
| <b>Stanwick</b>                   | Plan 'Made' - 17.07.17                          | n/a                    |
| <b>Thrapston</b>                  | Area designated - 25.05.22                      | Informal Plan drafting |
| <b>Twywell</b>                    | Area designated - 09.05.19                      | No further progress    |

|  |                            |                        |
|--|----------------------------|------------------------|
| <b>Warmington</b>                                | Plan 'Made' - 17.12.19     | n/a                    |
| <b>Kettering area</b>                            |                            |                        |
| <b>Braybrooke</b>                                | Plan 'Made' – 08.06.23     | n/a                    |
| <b>Broughton</b>                                 | Plan 'Made' - 17.10.18     | n/a                    |
| <b>Desborough</b>                                | Area designated - 16.10.13 | Informal Plan drafting |
| <b>Grafton Underwood</b>                         | Area designated - 03.06.19 | Informal Plan drafting |
| <b>Great Cransley</b>                            | Area designated - 27.05.15 | Informal Plan drafting |
| <b>Harrington</b>                                | Plan 'Made' – 08.06.23     | n/a                    |
| <b>Mawsley</b>                                   | Area designated - 15.04.15 | No further progress    |
| <b>Pytchley</b>                                  | Area designated - 07.12.15 | Informal Plan drafting |
| <b>Rothwell</b>                                  | Area designated - 10.04.13 | Informal Plan drafting |
| <b>Rushton</b>                                   | Area designated - 22.03.22 | Informal Plan drafting |
| <b>South West Kettering</b>                      | Plan 'Made' – 08.06.23     | n/a                    |
| <b>Wilbarston</b>                                | Area designated - 11.07.22 | Informal Plan drafting |
| <b>Wellingborough area</b>                       |                            |                        |
| <b>Earls Barton</b>                              | Plan 'Made' - 19.01.16     | Review underway        |
| <b>Ecton</b>                                     | Plan 'Made' - 22.06.21     | n/a                    |
| <b>Irchester, Knuston &amp; Little Irchester</b> | Plan 'Made' - 16.10.18     | Review underway        |
| <b>Isham</b>                                     | Area designated - 05.06.19 | Informal Plan drafting |
| <b>Wollaston</b>                                 | Plan 'Made' - 20.12.16     | n/a                    |

## EXECUTIVE 16<sup>th</sup> November 2023

|                      |  |
|----------------------|--|
| <b>Report Title</b>  | <b>East Northamptonshire Local Plan Part 2</b>   |
| <b>Report Author</b> | Graeme Kane, Executive Director for Place & Economy (Interim)<br><br>Richard Palmer, Planning Policy Manager – East Northants Area |
| <b>Lead Member</b>   | Cllr David Brackenbury, Executive Member for Growth and Regeneration   |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

- Appendix A** – East Northamptonshire Local Plan Part 2
- Appendix B** – Local Plan draft adoption statement
- Appendix C** – Sustainability Appraisal adoption statement
- Appendix D** – Inspector’s Report
- Appendix E** – Schedule of Main Modifications
- Appendix F** – Schedule of Additional Modifications
- Appendix G** – Schedule of changes to the Policies Map

### **1. Purpose of Report**

---

- 1.1. To progress the Part 2 Local Plan for East Northamptonshire to adoption in order to provide an up-to-date development plan for making planning decisions and to guide development proposals for the area.
- 1.2. This report includes the Inspector’s report into the examination, and the Main Modifications required to make the Plan sound for consideration and seeks the Executive’s agreement ahead of the Plan being recommended to Full Council for adoption, as modified by the Inspector’s Report and the Council’s Additional Modifications.

## 2. Executive Summary

---

- 2.1 Local plans are usually prepared by Local Planning Authorities (LPAs). North Northamptonshire Council is the responsible body, as the LPA, for plan making within North Northamptonshire and is required to ensure that development plan documents for the area remain up to date.
- 2.2 The former Council of East Northamptonshire resolved to submit the Local Plan for examination to the Secretary of State in March 2021, the examination hearing sessions were subsequently held from April to May 2022.
- 2.3 The Council worked with the Inspector to agree a series of Main Modifications necessary to make the Local Plan sound. These were subject to consultation earlier this year, the responses were then considered by the Inspector before the Inspector's Report was submitted to the Council.
- 2.4 The outcome of the examination was a report prepared by the appointed Planning Inspector, received by the Council on 31<sup>st</sup> July 2023. This concluded, that whilst the submitted plan had a number of deficiencies in respect of soundness and legal compliance, by taking into account the Inspector's recommended Main Modifications to the Plan, this would mean that the East Northamptonshire Local Plan Part 2 would satisfy the legislative requirements and would therefore be found sound and could proceed to adoption.
- 2.5 Formal adoption is the final stage in the process of producing an up-to-date development plan which will form the basis for making planning decisions and guiding development proposals in the East Northamptonshire area. In order to progress the local plan to adoption, the Executive is requested to consider supporting the proposed adoption of the Part 2 Local Plan, as revised through the Main Modifications schedule and the Council's Additional Modifications.

## 3. Recommendations

---

- 3.1 It is recommended that the Executive:
  - a) Support the content of the Part 2 Local Plan Council, (as set out in **Appendix A**) in advance of its progression to adoption by Full Council;
  - b) Delegates authority to the Executive Member for Growth and Regeneration, in consultation with the Assistant Director for Growth and Regeneration, to make any minor alterations to the Plan, or its accompanying Policies Map, that relate to factual updates or typographical errors for the purposes of publishing the Plan to presentation standard; and;
  - c) Delegates authority to the Executive Member for Growth and Regeneration, in consultation with the Assistant Director for Growth and Regeneration, to prepare and publish the Local Plan Adoption Statement (**Appendix B**) and the Sustainability Appraisal Statement (**Appendix C**) and to fulfil any other duties, as required by Regulations 26 to 36 of the Town and Country (Local Planning) (England) Regulations 2012.



### 3.2 Reasons for Recommendation

- The National Planning Policy Framework (NPPF) states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social, and environmental priorities.
- The Plan prepared by the Council was subject to thorough examination and has been modified as a result of the recommendations made by the Inspector, as set out in her report (**Appendix D** refers). The Council has previously consulted on a schedule of these Main Modifications (**Appendix E**) and has also made non-substantive modifications to the plan during the examination, which are set out at **Appendix F** to this report. Corresponding changes to the Policies Map are also set out in **Appendix G**.
- Subsequent to the adoption of the East Northamptonshire Local Plan Part 2, it will supersede all the saved policies from the 1996 Local Plan for East Northamptonshire, along with the extant policies from the 2011 Rural North, Oundle and Thrapston Local Plan.

3.3 Alternative Options Considered – The options considered are either to adopt the Local Plan incorporating the recommended modifications, or to resolve not to adopt the Plan.

3.4 Adoption of the Plan would provide full coverage for Part 2 Plan policies across the whole of North Northamptonshire. If the Plan was not adopted this would put at risk the delivery of key policies guiding future, sustainable development proposals across East Northamptonshire area.

## 4. Report Background

---

4.1 All councils are required to have a plan for development in their area, which is known as a Local Plan. The plan is expected to set out a range of development proposals as well as planning policies and should support the delivery of the Council's vision for the area.

4.2 The North Northamptonshire Joint Core Strategy (JCS) was adopted in July 2016 by the North Northamptonshire Joint Planning Unit, endorsed by the former councils that now comprise the North Northamptonshire local government administrative area. The strategy provides the overarching strategic local plan, commonly referred to as the Part 1 Local Plan – it outlines the strategic policy direction, to be developed in more detail through Part 2 Local Plans, prepared by each former borough/district council and any neighbourhood planning groups.

4.3 The Part 2 Local Plan sets out the non-strategic development allocations and detailed policies to manage development in line with the strategic policies of the JCS for the East Northamptonshire area of the Council.

- 4.4 The decision to submit the East Northamptonshire Part 2 Local Plan to the Secretary of State for examination was made by the former East Northamptonshire Council's Planning Policy Committee on 27<sup>th</sup> January 2021.
- 4.5 The purpose of the examination is for the appointed planning inspector to ensure that the relevant legal and procedural requirements have been followed and to test the plan for its soundness as set out in paragraph 35 of the NPPF. Only if the plan is considered sound by the planning inspector can it be capable of legal adoption by the Council.
- 4.6 The Inspector issued her report to the Council on 31<sup>st</sup> July 2023, in that report the planning inspector identified 10 main issues in the draft plan that were material to her assessment of the soundness of the Plan:
- i) Whether the Plan's spatial strategy, including the approach to the settlement hierarchy and settlement boundaries, is positively prepared, consistent with the JCS and national policy, justified and effective;
  - ii) Whether the Plan is positively prepared, justified and effective in meeting the requirements set out in the JCS in relation to housing provision;
  - iii) Whether the Plan is positively prepared, justified, effective and consistent with national policy and the JCS in terms of meeting other housing needs;
  - iv) Whether the Housing Allocations are positively prepared, justified, effective, consistent with national policy and the JCS and deliverable/developable;
  - v) Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards building a strong, competitive economy;
  - vi) Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to the matter of town centres, town centre strategies and development sites?
  - vii) Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to the matter of social capital;
  - viii) Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to natural capital;
  - ix) Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to viability;
  - x) Whether effective arrangements are in place for the monitoring of the Plan.
- 4.7 The examination was a rigorous and public process, involving consideration of all the relevant matters (including all issues in the written representations) and the supporting evidence base together with examination hearing sessions conducted between 6<sup>th</sup> April and 5<sup>th</sup> May 2022 (a total of 8 hearing days examining 14 separate matters). The hearings were run by the appointed

Inspector, Caroline Mulloy and included council representatives and invited participants, including Josef Cannon a specialist planning barrister, who advised the Council during the examination.

- 4.8 The hearings covered matters and questions which the Inspector considered required further exploration, allowing those parties with concerns about the plan to provide further information linked to the matters and issues determined by the Inspector. Further statements and information were produced as part of the examination process at the request of the Inspector and made available on the examination website.

#### Main Modifications to the submitted Plan

- 4.9 A Planning Inspector can recommend changes to the plan (known as 'Main Modifications') during the examination to make a submitted plan sound and legally compliant, but only if asked to do so by the local planning authority, this was agreed by the Council.
- 4.10 During the examination the Inspector identified issues that she considered affected the soundness of the plan. Throughout the hearing sessions a schedule of potential main modifications was drafted. After the hearings closed in May 2022, the Council drafted a composite list of main modifications and, through an iterative process, agreed these with the Inspector.
- 4.11 The Schedule of proposed Main Modifications, and the main issues arising were reported to the Planning Policy Executive Advisory Panel at its meeting held on 14<sup>th</sup> December 2022 and then published for public consultation from 10<sup>th</sup> March to 21<sup>st</sup> April 2023.
- 4.12 The Inspector considered the results of the public consultation on the modified draft plan and issued her report into the soundness of the plan on 31<sup>st</sup> July 2023. This stated in the section entitled Overall Conclusion and Recommendation (para 236 of **Appendix B**) that:
- 4.13 *"The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act."*
- 4.14 However, the Inspector further added the following:
- 4.15 *"The Council has requested that I recommend Main Modifications (MMs) to make the Plan sound and legally compliant and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended MMs set out in the Appendix the East Northamptonshire Local Plan Part 2 2011-2031 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound".*
- 4.16 The Inspector's report has been published on the Council's website, and all contributors to the plan process have been notified of its availability. The receipt of the Inspector's report marks the completion of the examination.

## Minor/Additional Modifications to the submitted Plan

- 4.17 In preparing the Local Plan for adoption, additional minor modifications can be made to it by the Council provided they do not materially affect the plan's policies. These include such things as correcting typographic errors, changes which are consequential to the Main Modifications and factual updating. The Council has authority to make minor modifications without reverting to the Inspector or carrying out consultations on them. The changes that have been made to the Plan, and approved by the Inspector under this provision, are set out in **Appendices E, F and G**.
- 4.18 The Local Plan, as attached at **Appendix A** to this report, incorporates all the modifications set out in the Main, Additional and Policies Map schedule of changes, and therefore represents the Plan as proposed to be adopted.

## **5. Issues and Options**

---

- 5.1 The Council has now reached the adoption stage of the development plan preparation process. In accordance with section 23 of the 2004 Planning and Compulsory purchase Act, the Council can now either:
- 5.1.1 adopt the East Northamptonshire Local Plan Part 2 incorporating the recommended modifications; or
  - 5.1.2 resolve not to adopt the Local Plan
- 5.2 Adoption of the East Northamptonshire Local Plan would provide full coverage for Part 2 Local Plan policy across the whole of North Northamptonshire. Its adoption would also provide an up-to-date suite of policies for guiding future development proposals and allocations across East Northamptonshire, providing clear direction, borne out of significant public consultation and interaction with councillors and various stakeholders over recent years.
- 5.3 If the Local Plan is not adopted, as modified, this would put at risk the delivery of key policies in guiding sustainable development. It would also result in there being an incomplete and partially out of date local planning policy framework to guide future development decisions in the East Northamptonshire area.
- 5.4 If the Council agrees to adopt the East Northamptonshire Local Plan Part 2, the Plan will be finalised for adoption and publication. The Advisory Panel is therefore recommended to support the submission of the Plan for consideration by the Executive (then Full Council), and to delegate to the Executive Member for Growth and Regeneration in consultation with the Assistant Director for Growth and Regeneration, the ability to finalise the document by resolving the formatting and presentation of the content of the document prior to publication.
- 5.5 If adopted, the East Northamptonshire Local Plan Part 2 would carry full weight in the determination of planning applications for the area and become part of the development plan for this same area alongside the North Northamptonshire Joint Core Strategy, and any made Neighbourhood Plans. The adopted Plan would supersede the remaining saved policies from the 1996 District wide Local Plan and the 2011 Rural North Oundle and Thrapston Local Plan.

5.6 The adoption process also requires the Council to prepare and publish an Adoption Statement to accompany the Local Plan in accordance with regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Adoption Statement sets out:

- Date which the Local Plan was adopted;
- Modifications following the Pre-Submission Publication Draft; and
- Notice that any person aggrieved by the process can make an application to the High Court within 6 weeks from the date of adoption

5.7 The Policies Map maintained by the Council illustrates geographically on an Ordnance Survey base where the policies and proposals of the development plan apply. Following the adoption of the Plan, the Policies Map would need updating to reflect the change in policy. As soon as possible after adoption, a Policies Map reflecting the adopted Local Plan will need to be published.

## **6. Next Steps**

---

6.1 Should the Executive resolve to adopt the Local Plan, as recommended in this report, the adoption process will progress to Full Council to approve its formal adoption. The policies will then carry full weight in assessing future development proposals with the East Northamptonshire area.

## **7. Implications (including financial implications)**

---

### **7.1 Resources, Financial and Transformation**

7.1.1 The costs associated with producing the Local Plan have been met from existing budgets. There are only minimal costs outstanding to progress the Plan to adoption, which will be funded from the current planning policy budget.

7.1.2 In respect of other resources, the procedure to adopt the Plan will now largely be achieved through legislative tasks, though some additional work will be required to prepare an updated accessible Local Plan document. Thereafter, there will be no ongoing cost to the Council from the adoption of the Local Plan.

### **7.2 Legal and Governance**

7.2.1 There are no direct legal implications arising from this report, other than fulfilling the statutory requirements for adopting the Local Plan in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Planning and Compulsory Purchase Act 2004 (as amended, inter alia, by the Localism Act 2011), which are set out in the body of the report.

### **7.3 Relevant Policies and Plans**

- 7.3.1 The policies set out in the Local Plan provide direction for a wide range of issues and will support many of the initiatives set out in the Corporate Plan 2021-25, particularly objectives 1 Active fulfilled lives; 3 Safe and thriving places; 4 Greener, sustainable environment; and 5 Connected communities.

### **7.4 Risk**

- 7.4.1 The greatest risk is that the adoption of the East Northamptonshire Part 2 Local Plan is challenged post adoption. To mitigate this risk, the preparation of the plan has followed a robust process, and this is reflected in the positive conclusions of the Inspector's Report. This should minimise the grounds for legal challenge after adoption. Further, the Council has received specialist legal advice throughout the process to ensure that the prospect of successful challenge is minimised.

### **7.5 Consultation**

- 7.4.1 The Council has complied with its obligations to undertake appropriate consultation at all points in the development of this plan in line with legislative requirements, including those requirements set out in the Council's Statement of Community Involvement. Adoption of the Plan will be published in line with legislative requirements.

### **7.6 Consideration by Executive Advisory Panel**

- 7.6.1 This report is due to be considered by the Planning Communities Executive Advisory Panel meeting to be held on 24 October 2023. Any additions relating to the outcome of that meeting will be provided verbally as an update.

### **7.7 Consideration by Scrutiny**

- 7.7.1 None yet, however, the matter is a key decision and is therefore eligible for call in.

### **7.8 Equality Impact**

- 7.8.1 The Local Plan has the potential to impact positively on all residents and visitors to the former East Northamptonshire area, with equalities implications considered at an early stage and integrated into policy development. An Equality Impact Assessment has been previously undertaken on the policy impacts of the Plan.

## **7.9 Climate and Environment Impact**

7.9.1 The Part 2 Local Plan for East Northamptonshire, in combination with the Joint Core Strategy includes policies designed to secure that the development and use of land in the former East Northamptonshire area contributes to the mitigation of, and adaptation to, climate change. These include policies setting out the policy direction on the sustainable approach to the location of future development, renewable and low carbon energy, water resources and sustainable drainage, health and wellbeing and green infrastructure.

## **7.10 Community Impact**

7.10.1 Upon adoption, the Local Plan Part 2 will ensure that the Council will have a clear up to date statutory planning policy framework to inform decisions on future planning applications, which take account of the needs of local communities, particularly in respect of addressing housing, employment and community infrastructure needs, including the provision of recreation and open space. It would also help improve the quality of future planning applications and permissions by encouraging higher quality submissions and ensuring that local planning policies reflect both national guidance and local aspirations.

## **7.11 Crime and Disorder**

7.11.1 The Local Plan considers aspects of crime and disorder, particularly through design and placemaking, amplifying policies contained in the Joint Core Strategy. Consultation has been undertaken with appropriate organisations, including Northamptonshire Police, designing out crime.

## **8. Background Papers**

---

8.1 Background papers relating to the preparation of the Plan are available on the former Council's web site:

East Northamptonshire Local Plan Part 2 Examination webpage -

[https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/12](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/12)

This page is intentionally left blank



## Contents

### Foreword

#### 1.0 Introduction

#### 2.0 Area Portrait

#### 3.0 Vision and Outcomes

#### 4.0 Spatial Development Strategy

EN1: Spatial development strategy

EN2: Development Principles

EN3: Development on the periphery of settlements and rural exceptions housing

EN4: Replacement dwellings in the open countryside

#### 5.0 Natural Capital – environment, Green Infrastructure, energy, sport and recreation

EN5: Local Green Infrastructure corridors

EN6: The Greenway

EN7: Designation of Local Green Space

EN8: Enhancement and provision of open space

EN9: Enhancement and provision of sport and recreation facilities

#### 6.0 Social Capital – design, culture, heritage, tourism, health and wellbeing, community infrastructure

EN10: Health and wellbeing

EN11: Design of Buildings/ Extensions

EN12: Designated Heritage Assets

EN13: Non-Designated Heritage Assets

EN14: Tourism, cultural developments and tourist accommodation

#### 7.0 Economic Prosperity – employment, economy, town centres/ retail

EN15: Commercial space to support economic growth for Small and Medium-sized enterprises

EN16: Protected Employment Areas

EN17: Relocation and/ or expansion of existing businesses

EN18: Town centres and primary shopping frontages

EN19: Impact test thresholds for retail development

EN20: Local Centres

**8.0 Housing Delivery – housing mix/ tenure, affordable housing, specialist housing, market delivery, site specific allocations**

- EN21: Land rear of Cemetery, Stoke Doyle Road, Oundle
- EN22: Cotterstock Road/ St Peter's Road, Oundle
- EN23: St Christopher's Drive, Oundle
- EN24: Land east of the A6/ Bedford Road, Rushden
- EN25: Delivering wheelchair accessible housing
- EN26: Housing mix and tenure to meet local need
- EN27: Older people's housing provision
- EN28: Self and custom build housing

**9.0 Delivering Sustainable urban extensions**

- EN29: Rushden East Sustainable Urban Extension

**10.0 Town Centre Strategies – Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds, Thrapston**

- EN30: Reimagining Town Centres – guiding principles
- EN31: Splash Pool and Wilkinson site redevelopment, Rushden
- EN32: Former factory site, between 71 Oakley Road and 37-51 Washbrook Road, Rushden
- EN33: Rectory Business Centre, Rushden
- EN34: Federal Estates/ former Textile Bonding factory site, Newton Road/ Midland Road, Higham Ferrers
- EN35: Former Select & Save, 13-21 High Street/ St Peter's Way Car Park, Irthlingborough
- EN36: Former Rushden and Diamonds FC Stadium site, Nene Park, Diamond Way, Irthlingborough
- EN37: Riverside Hotel, Station Road, Oundle
- EN38: Cattle Market, Market Road, Thrapston

**11.0 Monitoring and implementation**

**12.0 Glossary**

**13.0 Appendices and Maps/Insets**

**Appendix 1:** Policy Index – Local Plan Outcomes, related Joint Core Strategy policies, and policy status (strategic or non-strategic)

**Appendix 2:** Economic Use Classes

**Appendix 3:** Employment Protection Areas

**Appendix 4:** Town Centres, Primary Shopping Areas and Local Centres

**Appendix 5:** Specialist and older persons housing provision – site selection and design principles criteria

**Appendix 6:** Housing Trajectory

**Policies Map**

**Oundle Inset**

**Thrapston Inset**

**Raunds and Stanwick Inset**

**Irthlingborough Inset**

**Rushden and Higham Ferrers Inset**

## Index of Figures and Tables

|                  | Title   | Paragraph/<br>Policy<br>reference | Page |
|------------------|---|-----------------------------------|------|
| <b>Figure 1</b>  | Preparation of the Local Plan – key milestones  | 1.11                              | 9    |
| <b>Figure 2</b>  | Plan Making – North Northamptonshire Framework  | 1.13                              | 10   |
| <b>Figure 3</b>  | East Northamptonshire Area: Spatial context   | 1.31                              | 14   |
| <b>Figure 4</b>  | Spatial Elements of the East Northamptonshire Area  | 3.5                               | 29   |
| <b>Figure 5</b>  | Local Plan outcomes   | 3.7                               | 30   |
| <b>Figure 6</b>  | Local Plan spatial strategy – settlement hierarchy  | 4.26                              | 41   |
| <b>Figure 7</b>  | Priority Green Infrastructure Corridors   | 5.15                              | 52   |
| <b>Figure 8</b>  | The Greenway  | 5.20                              | 55   |
| <b>Figure 9</b>  | Rockingham Forest and Destination Nene Valley   | 6.40                              | 73   |
| <b>Figure 10</b> | South East Midlands area (Strategic Economic Plan, Figure 1, p9)                                | 7.4                               | 78   |
| <b>Figure 11</b> | Land rear of Cemetery, Stoke Doyle Road, Oundle   | 8.30                              | 107  |
| <b>Figure 12</b> | Cotterstock Road/ St Peter's Road, Oundle   | 8.34                              | 109  |
| <b>Figure 13</b> | St Christopher's Drive, Oundle  | 8.38                              | 111  |
| <b>Figure 14</b> | Land east of the A6/ Bedford Road, Rushden (South East Rushden)                                 | 8.52                              | 115  |
| <b>Figure 15</b> | Rushden East Sustainable Urban Extension  | 9.8                               | 133  |
| <b>Figure 16</b> | Irthlingborough West site plan  | 9.13                              | 139  |
| <b>Figure 17</b> | Rushden and Higham Ferrers Spatial Diagram  | 10.13                             | 143  |
| <b>Figure 18</b> | Rushden redevelopment opportunities   | 10.18                             | 146  |
| <b>Figure 19</b> | Former factory site, between 71 Oakley Road and 37-51 Washbrook Road, Rushden                   | 10.26                             | 149  |
| <b>Figure 20</b> | Rectory Business Centre, Rushden  | 10.32                             | 151  |
| <b>Figure 21</b> | Federal Estates/ former Textile Bonding factory site, Newton Road/ Midland Road, Higham Ferrers | 10.42                             | 154  |
| <b>Figure 22</b> | Irthlingborough Spatial Diagram   | 10.44                             | 155  |
| <b>Figure 23</b> | Former Select & Save, 13-21 High Street/ St Peter's Way Car Park, Irthlingborough               | 10.50                             | 158  |
| <b>Figure 24</b> | Irthlingborough East/ Nene Park   | 10.51                             | 159  |
| <b>Figure 25</b> | Oundle Spatial Diagram  | 10.61                             | 162  |
| <b>Figure 26</b> | Oundle – key redevelopment opportunities  | 10.62                             | 164  |
| <b>Figure 27</b> | Riverside Hotel, Station Road, Oundle   | 10.68                             | 165  |
| <b>Figure 28</b> | Raunds Spatial Diagram  | 10.72                             | 167  |
| <b>Figure 29</b> | Thrapston and Islip Spatial Diagram   | 10.76                             | 169  |
| <b>Figure 30</b> | Thrapston Town Centre redevelopment opportunities   | 10.85                             | 172  |
| <b>Figure 31</b> | Cattle Market, Market Road, Thrapston   | 10.88                             | 173  |
| <b>Table 1</b>   | Population data   | 2.4                               | 19   |
| <b>Table 2</b>   | Settlement roles  | 4.2                               | 34   |
| <b>Table 3</b>   | Distribution of housing requirements (urban areas)  | 4.6                               | 35   |
| <b>Table 4</b>   | Functional roles for rural settlements  | 4.12                              | 37   |

|                 | <b>Title</b>   | <b>Paragraph/<br/>Policy<br/>reference</b> | <b>Page</b> |
|-----------------|--|--|-------------|
| <b>Table 5</b>  | Defined villages   | 4.26                                       | 40          |
| <b>Table 6</b>  | Open Space Assessment – Quality and Value Criteria   | 5.30                                       | 59          |
| <b>Table 7</b>  | Open Space Accessibility Standards   | 5.31                                       | 59          |
| <b>Table 8</b>  | Level of provision required to support new development   | 5.32                                       | 60          |
| <b>Table 9</b>  | Jobs delivery trajectory   | 7.18                                       | 82          |
| <b>Table 10</b> | Top 40 businesses  | 7.44                                       | 88          |
| <b>Table 11</b> | Town centre boundaries and primary shopping areas  | 7.55                                       | 92          |
| <b>Table 12</b> | Recent convenience retail developments   | 7.63                                       | 95          |
| <b>Table 13</b> | Major sites  | 8.8  | 101         |
| <b>Table 14</b> | Urban areas residual housing requirement, as at 1 April 2020   | 8.10                                       | 102         |
| <b>Table 15</b> | Rural areas residual housing requirement, as at 1 April 2020   | 8.16                                       | 103         |
| <b>Table 16</b> | Indicative rural housing need  | 8.20                                       | 104         |
| <b>Table 17</b> | East Northamptonshire: Projected housing requirements for older persons 2011-2031 (SHMA update 2015) | 8.70                                       | 120         |
| <b>Table 18</b> | Specialist older person's housing shortfall (East Northamptonshire)                                  | 8.72                                       | 121         |
| <b>Table 19</b> | Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033          | 8.101                                      | 129         |
| <b>Table 20</b> | Sustainable Urban Extensions - Anticipated delivery by 2031  | 9.1  | 131         |
| <b>Table 21</b> | Irthlingborough West - breakdown of the development area   | 9.12                                       | 138         |
| <b>Table 22</b> | Spatial parts of Rushden and Higham Ferrers  | 10.13                                      | 143         |
| <b>Table 23</b> | Spatial parts of Irthlingborough   | 10.44                                      | 156         |
| <b>Table 24</b> | Spatial parts of Oundle  | 10.61                                      | 162         |
| <b>Table 25</b> | Spatial parts of Raunds  | 10.72                                      | 167         |
| <b>Table 26</b> | Spatial parts of Thrapston and Islip   | 10.76                                      | 169         |
| <b>Table 27</b> | Performance indicators and targets for monitoring  | 11.14                                      | 178         |

## **Foreword** *(to be updated following adoption)*

*Introduction by Cllr David Brackenbury (Executive Member for Growth and Regeneration)*

*This plan sets out a vision for East Northamptonshire, building on the proposals and land use allocations as set out in the Joint Core Strategy. The North Northamptonshire Joint Core Strategy 2011-2031 includes significant proposals such as the Rushden East sustainable urban extension and a new garden community at Tresham in the north of the district. It seeks to add local value through its policies which reflect the distinctive characteristics and attractiveness of the area.*

*The plan supports the growth and diversification of business opportunities across the district, recognising the need to ensure its market towns remain as thriving and competitive centres by providing a range of services and facilities for their local communities as well as encouraging town centre regeneration schemes to encourage future redevelopment opportunities.*

*As the growth town for the area, Rushden will provide the majority of new housing and employment development during the plan period. This will help deliver future housing and employment needs, supported by infrastructure and services including transport, retail and leisure, to help ensure a sustainable, high quality environment.*

*Much of the district is rural, interspersed with villages and market towns. It is bisected in a north/south direction by the Nene Valley, a focus for blue and green infrastructure that provides a significant natural asset which enhances the district. The Plan aims to ensure those rural communities have the ability to meet local needs, as well as providing opportunities to improve local connections, create local employment prospects and develop the visitor offer.*

*To meet the needs of the wider community, the plan seeks to provide a range of housing types including for the older population who may be looking quality housing for downsizing or meeting a specialist need through care and extra care provision. The plan recognises the need to provide for aspirational choice and the variety of demand and need across the district, from predominantly smaller properties in the rural north to larger properties in the south. It also considers those who wish to be more proactive in designing the type of home they wish for through exciting opportunities such as custom build.*

*This plan also recognises the importance of the area's natural and built assets and includes a number of policies that seek to enhance and protect its distinctive green spaces as well as meeting the challenge of sensitively designed development. In drafting this plan, we have engaged with many different organisations and we are now asking for your views on what the plan says and whether you think it needs to include any further proposals for addressing the area's future needs.*

## 1.0 Introduction

### Layout of the Local Plan Part 2

1.1 The Local Plan Part 2 is a statutory development plan document covering the former district of East Northamptonshire. While this Plan is self-contained, it should be read in conjunction with the North Northamptonshire Joint Core Strategy 2011-2031 (the Local Plan Part 1; referred to as the “Joint Core Strategy” in the document)<sup>1</sup>, Neighbourhood Plans and national policies. This document contains appropriate planning policies for the growth and regeneration of the district up to 2031. It is proposed that this will present a vision of the EastNorthamptonshire Area of North Northamptonshire Council through the objectives and policies which will set out what and how much development should take place and the sites and strategies required to meet this target growth.

1.2 The Plan consists of the following key elements:

- **Sections 1.0-3.0 – Introduction, Area Portrait, and Vision and Outcomes (introductory sections)** – sets the scene in terms of the evidence base and the context of higher level national or Joint Core Strategy policies; outlines key reasons and factors that entail the need for suitable local policies; and sets out Plan-level Vision and Outcomes to be achieved;
- **Section 4.0 – Spatial Development Strategy** – provides additional strategic and spatial policy direction for the area , over and above the overarching spatial policy framework set out in the Joint Core Strategy;
- **Sections 5.0-6.0 – Natural and Social Capital** – sets out additional policies for the protection and enhancement of natural, heritage, cultural and community assets;
- **Sections 7.0-9.0 – Economy and Housing** – sets out proactive policies and proposals for delivering economic growth and the housing requirements for the remainder of the Plan period (to 2031);
- **Section 10.0 – Town Centre Strategies** – sets out detailed policies and proposals for the re-imagination of existing urban areas;
- **Section 11.0 – Monitoring and Implementation** – each policy is supported by relevant indicators and targets, which will be reviewed annually through the North Northamptonshire Authorities’ Monitoring Report (AMR);
- **Appendices** – glossary and other supporting evidence and information for the Plan.

1.3 The Plan includes the following details of policy guidance:

| Policy type(s)                  | Relevant section heading(s)   |
|---------------------------------|---|
| Spatial policies                | Spatial Development Strategy; Natural Capital; Town Centre Strategies           |
| Development management policies | Spatial Development Strategy; Natural Capital; Social Capital; Housing Delivery |
| Site specific policies          | Economic Prosperity   |

<sup>1</sup> <http://www.nnjpdu.org.uk/publications/adopted-north-northamptonshire-joint-core-strategy-2011-2031/>

| Policy type(s)               | Relevant section heading(s)   |
|------------------------------|---|
| Development land allocations | Economic Prosperity; Housing Delivery; Delivering Sustainable Urban Extensions; Town Strategies |

- 1.4 Footnotes are used to provide references to related assessments, studies and policy documents, in order to show how policies have developed from an evidence base and are in accordance with other relevant policies and strategies.

### Policies Map

- 1.5 Under the legislation (Planning and Compulsory Purchase Act 2004<sup>2</sup>) and associated regulations, the Policies Map is classified as a separate document to the Local Plan Part 2. The legislation and national guidance set out the requirements for the Policies Map; namely that it must be reproduced from, or based on, an Ordnance Survey map, and must be cartographically clear. It forms a critical tool in explaining and understanding specific policies and proposals in the Plan.
- 1.6 Draft illustrative diagram maps and map extracts are included within this document where appropriate in order to provide additional clarity.

### Pre-Submission Draft Plan consultation

- 1.7 The Pre-Submission Draft Local Plan Part 2 was approved by the former East Northamptonshire Council's Planning Policy Committee on 27 January 2021. This represented the published Local Plan Part 2, which the former Council submitted to the then Secretary of State for Communities, Housing and Local Government in March 2021 for public examination by an independently appointed Planning Inspector.
- 1.8 The Plan was subject to a 6-weeks consultation, in accordance with Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended<sup>3</sup>, prior to assessment by the appointed Planning Inspector in accordance with four criteria set out below, to establish that the Plan has been prepared in accordance with the relevant legal and procedural requirements, and whether it is 'sound'; i.e. :
- a) **Positively prepared** – consistent with relevant strategic policies for the area [i.e. the Local Plan Part 1; the [North Northamptonshire Joint Core Strategy 2011-2031](#), adopted July 2016];
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) **Effective** – deliverable over the plan period; and
  - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the [National Planning Policy Framework](#) (NPPF).
- 1.9 The consultation took place from 5 February – 19 March 2021.

<sup>2</sup> <https://www.legislation.gov.uk/ukpga/2004/5/contents>

<sup>3</sup> <https://www.legislation.gov.uk/uksi/2012/767/contents>



## The Local Plan Part 2

### Purpose of the Plan

- 1.10 The Local Plan Part 2 will help guide future planning decisions in the East Northamptonshire area of North Northamptonshire for the period of 2011 to 2031. It contains policies that the Council will use to assess development proposals, together with the Joint Core Strategy (adopted 2016).
- 1.11 The Local Plan Part 2 replaces all of the extant saved policies from the former East Northamptonshire District Local Plan<sup>4</sup> (adopted 1996) and the Rural North, Oundle and Thrapston Plan<sup>5</sup> (adopted 2011).

**Figure 1: Preparation of the Local Plan – key milestones**

| Stage  | Dates  |
|--|--|
| Decision made to prepare new district-wide Local Plan Part 2   | 11 April 2016                                      |
| Formal commencement/ consultation on the scope of Plan/ call for sites, including issues/ options consultation (Regulation 18) | January – March 2017                               |
| Topic/ theme based Member workshops  | May – October 2017                                 |
| Area focused (town centre/ urban area and rural area) Member workshops   | November 2017 – January 2018                       |
| Town and Parish Council workshops  | February – April 2018                              |
| Draft Plan consultation  | November 2018 – February 2019                      |
| Additional sites/ focused changes consultations  | February – March 2020; and October – November 2020 |
| Publication of pre-submission draft Plan and consultation (Regulation 19)  | February – March 2021                              |
| Submission of Plan (Regulation 22)   | March 2021   |
| Examination of Plan (Regulation 24)  | April – May 2022                                   |
| Proposed Modifications Consultation  | March – April 2023                                 |
| Receipt of Inspectors Report (Regulation 25)   | July 2023  |
| Adoption of Plan (Regulation 26)   | December 2023                                      |

### Context for the Plan

- 1.12 The Plan has been prepared taking into account the National Planning Policy Framework (NPPF). Paragraphs 15-37 of the NPPF set out the approach which should be taken in respect of plan-making; the NPPF requires that plans should “be prepared with the objective of contributing to the achievement of sustainable development”. The NPPF (paragraph 8) specifies the three objectives of sustainable development:

- Economic – including supporting economic growth, innovation and productivity;
- Social – including housing delivery and wellbeing (quality of life); and

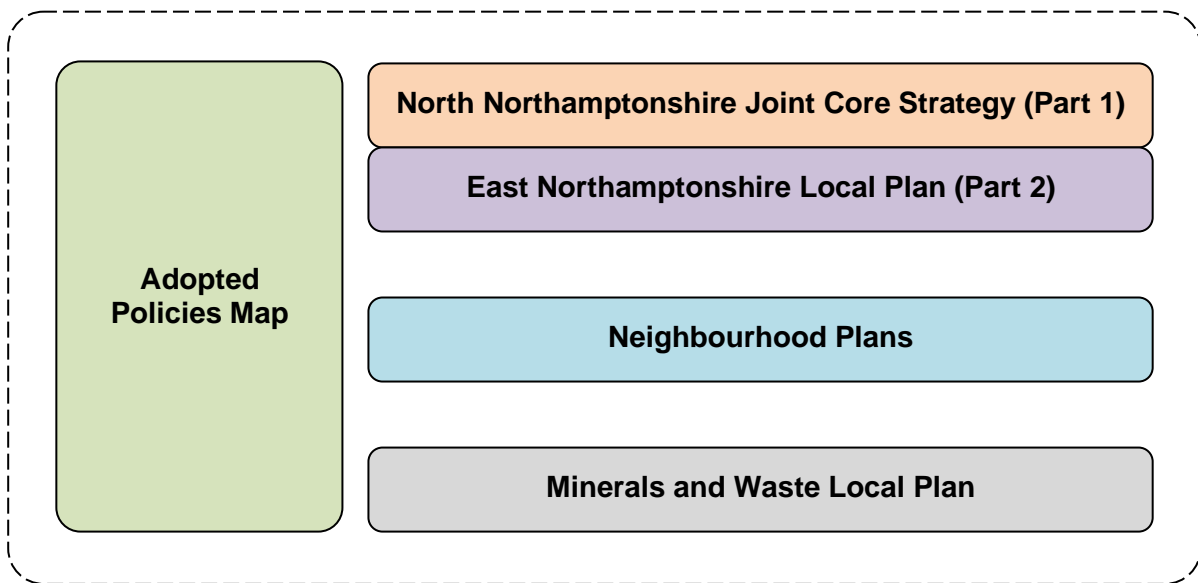
<sup>4</sup> [https://www.east-northamptonshire.gov.uk/info/200197/1996\\_district\\_local\\_plan/1676/1996\\_district\\_local\\_plan](https://www.east-northamptonshire.gov.uk/info/200197/1996_district_local_plan/1676/1996_district_local_plan)

<sup>5</sup> <https://www.east-northamptonshire.gov.uk/rnotp>

- Environmental – including conservation and enhancement of the natural (i.e. biodiversity and/ or ecological networks), built and historic environment.

1.13 The North Northamptonshire Joint Core Strategy (the Local Plan Part 1) deals with strategic issues across Kettering, Corby, Wellingborough and East Northamptonshire. It allocates strategic sites and sets out the overall spatial strategy, the required level of growth and the distribution of growth. It also includes both strategic and development management policies. This Plan supplements the Joint Core Strategy and provides greater local detail to issues relevant to the former district area of East Northamptonshire, where this is necessary to add value to these overarching strategic Local Plan policies.

**Figure 2: Plan Making – North Northamptonshire Framework**



1.14 The Localism Act 2011<sup>6</sup> allows local communities to make Neighbourhood Plans in order to shape growth and development in their area. Neighbourhood Plans must be in general conformity with strategic policies of the Local Plan and once “made” will form part of the statutory development plan for the area.

1.15 Neighbourhood Plans by definition, are non-strategic in scope. For Neighbourhood Plans to work effectively, policies should add local value and distinctiveness to the higher level policies of the Local Plan. The Local Plan Part 2 contains a mixture of strategic and non-strategic policies. This Plan has been written so as to minimise any potential for conflict between non-strategic Local Plan and extant Neighbourhood Plan policies; as in decision making “made” Neighbourhood Plan policies have parity with Local Plan policy making in terms of weightings in decision making<sup>7</sup>.

1.16 For locations where no Neighbourhood Plan has been “made” or is in preparation, this Plan provides the additional spatial policy framework, covering themes and topics that go beyond the scope of strategic (Joint Core Strategy) policies. This Plan also provides an

<sup>6</sup> <https://www.legislation.gov.uk/ukpga/2011/20/contents>

<sup>7</sup> Appendix 1 sets out, for each Plan policy, relevant Local Plan Outcomes (section 3.0), related Joint Core Strategy policies and whether the policy is strategic or non-strategic

enhanced policy framework, to allow future Neighbourhood Plans to set parish/ Neighbourhood Area level non-strategic and/ or site specific policies.

### **Soundness Tests**

- 1.17 Paragraph 35 of the NPPF sets out the criteria against which the independent planning inspector has assessed this Plan to determine whether it has been prepared in accordance with legal and procedural requirements, and whether it is 'sound'. Further details about the tests of 'soundness' (positively prepared; justified; effective, and consistent with national policy) are set out in full at paragraph 1.8, above.
- 1.18 Alongside complying with the four soundness tests, the Plan has been prepared in accordance with relevant legislation, so as to fulfil statutory requirements. Throughout the Plan preparation process, the former Council worked closely with specific consultation bodies to deliver a sound Local Plan. These statutory consultees have also worked closely with the Council to guide the process, with reference to matters such as flood risk management (Environment Agency); cultural heritage (Historic England); protection of designated biodiversity assets (Natural England), and to inform any potential cross boundary issues (neighbouring local authorities).

### **Duty to Cooperate**

- 1.19 The Localism Act 2011 introduced the 'Duty to Cooperate' as an amendment to the Planning and Compulsory Purchase Act 2004. The 'Duty to Cooperate' places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis with regard to the preparation of development plan documents to ensure that cross boundary planning matters have been taken into account.
- 1.20 The Council worked closely with other local authorities and partners in the North Northamptonshire area through the existing joint working arrangement. This joint arrangement had operated since 2004/5 and was formalised by way of secondary legislation (SI 2005 No. 1552<sup>8</sup>). The preparation of the Joint Core Strategy (strategic policies) was led by the North Northamptonshire Joint Planning and Delivery Unit (JPDU); a partnership of Corby Borough Council, East Northamptonshire Council, Kettering Borough Council, the Borough Council of Wellingborough and Northamptonshire County Council. These authorities merged into a single unitary authority for the North Northamptonshire area on 1 April 2021 forming the Unitary council of North Northamptonshire. The 'Duty to Cooperate' relates predominantly to strategic Local Plan policies which, in the main, are addressed through the Joint Core Strategy. This Plan falls within this framework, although continuous engagement with the North Northamptonshire partner authorities together with other national statutory bodies formed an integral part of the Plan-making process.
- 1.21 The statutory Duty to Cooperate, while predominantly a function of strategic Local Plan policies (i.e. the Joint Core Strategy), was nevertheless still a requirement for this Plan. One way that the Council ensured compliance with the Duty to Cooperate was through the preparation of Statements of Common Ground. These are prepared in conjunction with neighbouring/ interested local authorities and/ or other prescribed Duty to Cooperate bodies (statutory consultees; including national bodies such as Government departments

---

<sup>8</sup> <http://www.legislation.gov.uk/uksi/2005/1552/contents/made>

and other organisations such as Local Enterprise Partnerships) where appropriate, to support the Examination of the Plan.

### **Community engagement**

- 1.22 As shown in Figure 1 (above), the preparation of the Local Plan follows a number of key milestones, which entail continuous public consultation/ community engagement. The statutory Regulation 18 consultation (January – March 2017) was followed by a series of stakeholder workshop events with elected representatives and Town/ Parish Councils (2017-2018).
- 1.23 The subsequent consultation upon the 1<sup>st</sup> draft version of the Local Plan (November 2018 – February 2019) allowed for a full range of feedback (including additional evidence) from both statutory consultation bodies and the wider public. This consultation, which was in addition to the statutory milestones, enabled all stakeholders to respond to draft policies. This allowed policies to be further refined and developed prior to the formal publication and submission of the Plan.
- 1.24 Full details about these consultations are set out in the statutory Statement of Consultation; also known as the “Regulation 22” Statement. This is included within the suite of supporting submission Local Plan documents and also includes additional information regarding the Duty to Cooperate.

### **Evidence Base**

- 1.25 Paragraphs 31-33 of the NPPF required that the preparation of all policies should be underpinned by relevant and up-to-date evidence which is adequate, proportionate, focused on supporting and justifying the policies and takes into account relevant market signals.
- 1.26 This Plan is accompanied by background papers which provide additional supporting detail and evidence for the policies. These are available to view on the Council’s website:  
[https://www.east-northamptonshire.gov.uk/info/200190/annual\\_monitoring\\_report/68/evidence\\_base\\_and\\_monitoring](https://www.east-northamptonshire.gov.uk/info/200190/annual_monitoring_report/68/evidence_base_and_monitoring)
- 1.27 Evidence is available at many different levels, ranging between Ward, District, North Northamptonshire or data collected at a sub-regional/ regional level. In utilising the evidence base, it is important to understand the broader context for the Plan. This includes spatial policies that are already in force through the Joint Core Strategy and the Minerals and Waste Local Plan, adopted July 2017<sup>9</sup>.
- 1.28 The published evidence base that underpins this Plan takes many forms. These may be broader, more strategic documents; notably the Strategic Flood Risk Assessment (SFRA), updated February 2020<sup>10</sup> and the Infrastructure Delivery Plan (IDP), September

---

<sup>9</sup> <https://www3.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/minerals-and-waste-planning-policy/Pages/update-of-the-adopted-minerals-and-waste-local-plan.aspx>

<sup>10</sup> [https://www.east-northamptonshire.gov.uk/info/200190/annual\\_monitoring\\_report/68/evidence\\_base\\_and\\_monitoring/9](https://www.east-northamptonshire.gov.uk/info/200190/annual_monitoring_report/68/evidence_base_and_monitoring/9)

2017<sup>11</sup>. The SFRA provides an overarching District-level assessment of published (secondary) flood data to establish whether new development can be allocated outside high and medium flood risk areas. The IDP guides the development of new infrastructure to support new developments, both community (e.g. education) and physical (e.g. transport or utilities).

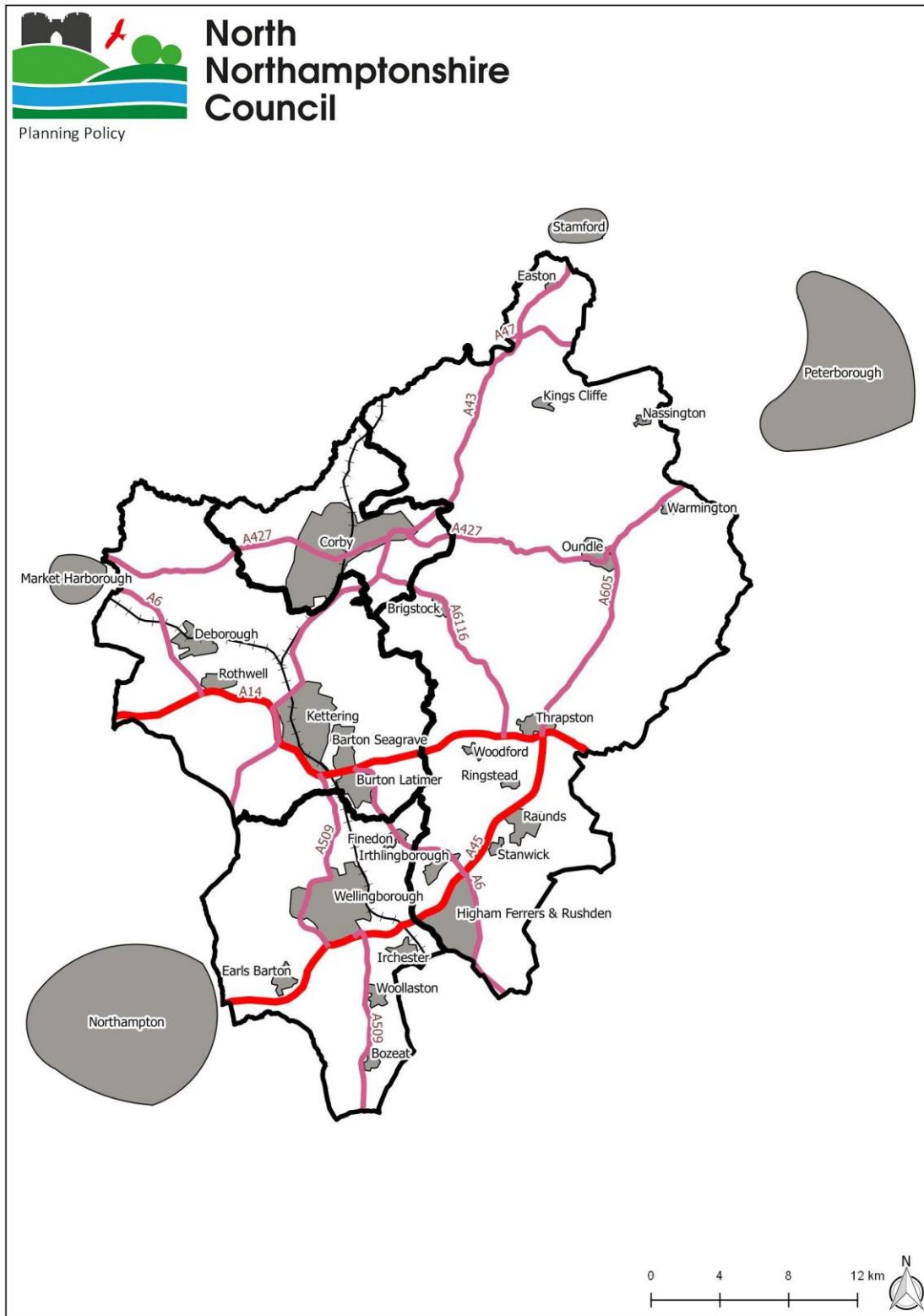
- 1.29 The 2017 North Northamptonshire IDP is supplemented by the updated East Northamptonshire Local Infrastructure Plan (LIP), January 2021<sup>12</sup>. In combination, the IDP and LIP provide a comprehensive and up to date resource detailing infrastructure delivery priorities for the remaining duration of the Plan period. Other evidence regarding infrastructure needs and priorities may take the form of bespoke assessments/ studies to support individual sections of the Plan or policies; e.g. Open Space and Playing Pitch Strategy (April 2017) or background papers.
- 1.30 Details of evidence base documents (with a hyperlink, where available) are shown as footnotes on each page. This information is included to ensure that the Plan policies and strategy are justified; i.e. that these fulfil the 2<sup>nd</sup> soundness test (that is, being based on proportionate evidence).
- 1.31 The scope and contents of this plan are directed by the Joint Core Strategy, adopted July 2016, and broader contextual information is set out in the spatial context map at Figure 3 (below). This includes strategic land use designations, which are shown on the Policies Map. Further spatial/ site specific information derived from this Plan will be added to the Policies Map upon adoption.

---

<sup>11</sup> <http://www.nnjpu.org.uk/publications/north-northamptonshire-infrastructure-delivery-plan/>

<sup>12</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12114/east\\_northamptonshire\\_local\\_infrastructure\\_plan](https://www.east-northamptonshire.gov.uk/downloads/file/12114/east_northamptonshire_local_infrastructure_plan)

**Figure 3: East Northamptonshire: Spatial context**



**Sustainability Appraisal and Strategic Environmental Assessment**

1.32 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a Sustainability Appraisal for each of the proposals in a Local Plan during its preparation, to promote sustainable development and ensure the Plan contributes to environmental, economic and social objectives. The UK Government signed up to European Directive 2001/42/EC when a member of the European



Community/ Union, incorporating Strategic Environmental Assessment into domestic legislation. This is incorporated into the wider Sustainability Appraisal process, to assess the potential effects of certain plans and programmes on the environment.

- 1.33 The process for undertaking Sustainability Appraisal is set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No 1633<sup>13</sup>) and requires consideration of “all reasonable alternatives”. The Council’s consultants AECOM undertook the Sustainability Appraisal<sup>14</sup> on behalf of the former East Northamptonshire Council, in parallel with the preparation of this Plan.
- 1.34 A Sustainability Appraisal is undertaken in parallel with the plan-making process. Several of the statutory consultation bodies provide detailed guidance, which supplements the Planning Practice Guidance<sup>15</sup>; e.g. Historic England<sup>16</sup>.
- 1.35 In accordance with NPPF Section 2, criteria to include physical limitations or problems such as access, infrastructure, ground conditions, flood risk, pollution and contamination are assessed. Potential impacts are considered, including the effect upon landscapes, biodiversity, conservation and environmental/amenity impacts. Accessibility, links and frequency of public transport to include intra-urban transport should be given significant weighting.
- 1.36 Whilst it is inevitable that new development would have some impact upon the existing built form, any assessment should consider the overall impact of any development, to include any potential mitigation that a site can deliver.
- 1.37 Other factors to be considered are public footpath connections, accessibility to footpaths and cycleways as well as the potential for enhancement of such facilities as part of any development.

### **Habitat Regulations Assessment**

- 1.38 A Habitat Regulations Assessment is required under the European Directive 92/43/EEC (which the UK Government incorporated into domestic legislation when a member) to assess the impacts of implementing a policy on European (Natura 2000) Sites, to determine whether it would have an adverse effect on the integrity of the site. The Upper Nene Valley Gravel Pits Special Protection Area (SPA)/ Ramsar site, which lies within the district between Irthlingborough and Thorpe Waterville, was confirmed in April 2011.
- 1.39 This Plan will be subject to a Habitat Regulations Assessment (HRA), under the Conservation of Habitats and Species Regulations 2017<sup>17</sup>. The HRA was undertaken by AECOM on behalf of the former East Northamptonshire Council, in parallel with the preparation of the Plan. Natural England and the Wildlife Trust have been engaged throughout the plan-making process with regards to the HRA process. The HRA report

---

<sup>13</sup> <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

<sup>14</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12096/sustainability\\_appraisal\\_report](https://www.east-northamptonshire.gov.uk/downloads/file/12096/sustainability_appraisal_report)

<sup>15</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>16</sup> <https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>

<sup>17</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents>

will be submitted alongside the Plan, within the suite of supporting submission documents.

- 1.40 Areas of land located beyond the Upper Nene Valley Gravel Pits SPA/ Ramsar site may also be important ecologically in supporting populations for which the SPA has been designated, these areas are defined as Functionally Linked Land (FLL). In the case of the Upper Nene Valley Gravel Pits SPA, Natural England has advised that land beyond designated SPA/ Ramsar sites may provide foraging habitats for protected wintering bird species such as lapwing and golden plover. FLL has been considered through the HRA undertaken to support the Plan.
- 1.41 Policy 4 of the JCS and the Special Protection Area SPD set out requirements where development would have an effect on the SPA to ensure that such development would have no significant effect on the SPA. The Special Protection Area SPD includes a Mitigation Strategy. The JCS Policies Map identifies two zones, one within a 3km buffer of the SPA and one within a 4km buffer of the SPA. Within the 3km buffer zone the SPA a Mitigation Strategy applies. For larger greenfield developments of 2ha or more, the Joint Core Strategy (paragraph 3.41) requires that within the 4km buffer these should be subject to site specific wintering bird surveys to determine if sites have a role as functionally linked land. The effectiveness and extent of the SPA buffer zones will need to be addressed through a review of the JCS, to ensure that a sustainable approach to future development proposals is agreed.
- 1.42 Natural England has raised concerns regarding the impacts of air quality and pollution upon the SPA/ Ramsar site. The local planning authority shares these concerns and since July 2020 the Council has required air quality assessments submitted in support of planning applications/ proposals, which are to be prepared in line with the East Midlands Air Quality Network (EMAQN) guidance.
- 1.43 Sites within the 3km buffer zone are bound by the Mitigation Strategy; whereby financial contributions to mitigate the adverse impacts of development upon the SPA/Ramsar site will be sought in accordance with the Addendum to the SPA Supplementary Planning Document: Mitigation Strategy. In line with the SPD requirements, consultation is required by Natural England in advance of submitting a planning application. As part of that consultation, further mitigation may be needed in exceptional circumstances and where Natural England advise. If a bespoke process is required, then a project level Appropriate Assessment will be required to accompany a planning application.
- 1.44 Within the 3km and 4km zones and potentially beyond, in order to comply with HRA legislation, development may need to be supported by bespoke assessments such as wintering bird surveys. To fulfil the precautionary principle, at Natural England's direction, the requirements for an appropriate assessment are set out below.



In submitting a planning application, the applicant will be required to provide evidence that the development will not result in a Likely Significant Effect upon the Upper Nene Valley Gravel Pits SPA/ Ramsar site. To achieve this, surveys will be required to determine habitats and current use of the site to determine if it does support a significant population of qualifying species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat.

Surveys should be required to be undertaken during autumn, winter and spring and at more than one year of survey data may be needed (to be agreed in consultation with the local planning authority and Natural England). If habitat within the site is identified to support significant populations of designated bird features avoidance measures and mitigation will be required, such as the creation of replacement habitat nearby, and the planning application will likely need to be supported by a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity

### **Equalities Impact Assessment**

- 1.45 An Equality Impact Assessment is required under the Equality Act 2010, to determine that the Council has had due regard to its duty to consider the equality impact of any proposed policies. The Plan has been subject to Equalities Impact Assessment Screening<sup>18</sup>, but only positive and/ or neutral impacts for protected or vulnerable groups were identified through this process.

### **Health Impact Assessment**

- 1.46 Health Impact Assessments (HIAs) are a requirement, as outlined in paragraph 91 of the NPPF, to ensure that planning policies and decisions aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs. This could be through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Policies should provide the social, recreational and cultural facilities and services the community needs. Planning policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- 1.47 Health and wellbeing is addressed further in the National Planning Guidance on Promoting Healthy and Safe Communities. This identifies that planners should engage with local health partners to help achieve healthier new developments and deliver the appropriate healthcare facilities to meet the needs of the residents of new developments. Undertaking a HIA, in relation to a development proposal, can help judge the likely health impacts of that proposal and help ensure any positive health impacts are achieved and negative health impacts minimised. To assist the process, the North Northamptonshire Joint Planning and Delivery Unit (NNJPDU) has produced a toolkit<sup>19</sup>, which has been utilised to prepare the HIA for this Plan.

---

<sup>18</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12089/equalities\\_impact\\_assessment](https://www.east-northamptonshire.gov.uk/downloads/file/12089/equalities_impact_assessment)

<sup>19</sup> <http://www.nnjpd.org.uk/publications/northamptonshire-rapid-hia-for-planning-tool/>

## Local Plan Viability

- 1.48 National policy (NPPF paragraphs 16 and 76) requires plan-making to be underpinned by robust viability evidence, as fundamental to ensuring successful implementation of Local Plan policies. It is required that these should reflect the recommendation approach in the Planning Practice Guide<sup>20</sup>, utilising standardised inputs.
- 1.49 Accordingly, in September 2019, BNP Paribas was appointed to undertake a viability assessment of the Plan. This analysis was systematically undertaken for each draft Local Plan policy prior to the statutory consultation for the published Plan (January – March 2021). The Viability Assessment<sup>21</sup> was finalised in January 2021 and was submitted with the Plan as part of the evidence base.

## Delivery, monitoring and review

- 1.50 Implementation of this Plan will be undertaken in accordance with the Monitoring and Implementation Framework (section 11.0). Each policy is supported by a monitoring objective, indicator and target, in order to assess its effectiveness.
- 1.51 The Plan will be monitored on an annual basis through the Authorities' Monitoring Report (AMR). The latest published AMR<sup>22</sup> at the stage of Plan drafting was for the 2018-19 monitoring year. The following measures may trigger a review of the Plan:
- Changes to national policies and/ or legislation;
  - Evidence that policies are not working as intended; or
  - New information or evidence becomes available which renders a policy out of date.

---

<sup>20</sup> <https://www.gov.uk/guidance/viability>

<sup>21</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11982/east\\_northamptonshire\\_local\\_plan\\_viability\\_assessment\\_bnp\\_paribas\\_july\\_2020](https://www.east-northamptonshire.gov.uk/downloads/file/11982/east_northamptonshire_local_plan_viability_assessment_bnp_paribas_july_2020)

<sup>22</sup> <http://www.nnjpu.org.uk/publications/north-northamptonshire-authorities-monitoring-report-18-19/>

---

## 2.0 Area Portrait

### Introduction – Background to the Plan area

- 2.1 The Local Plan Part 2 covers the whole of the former district of East Northamptonshire. It provides additional district/sub-district level policy detail to support the overarching spatial strategy for North Northamptonshire set out in the Local Plan Part 1; the Joint Core Strategy, adopted in July 2016.
- 2.2 The Plan area contains contrasting rural and urban aspects. The Area Portrait provides background contextual information for the Plan. These concepts are developed further; through the Vision and Outcomes (section 3.0), and the Spatial Development Strategy (section 4.0), before providing more detailed thematic and site specific policies which make up the remainder of this document.
- 2.3 This Area Portrait provides background information for each of the six towns within the district, starting with the designated Growth Town (Rushden) and then considering the other five Market Towns (Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston). Each of these designated Market Towns has its own character and functional role; each facing its own challenges, with a need to maintain a prosperous local economy and also maintain key heritage assets (e.g. pubs, tourism) as attractions for visitors. These distinctive characteristics are recognised through this Plan.
- 2.4 These towns have all undergone significant population growth (Table 1, below) with an overall 20% increase occurring in the urban areas over the previous 15 years (2001-2016). Proportionally, Higham Ferrers, Irthlingborough and Thrapston have seen the highest levels of growth (30% or more). It should be noted that there has been significant growth in the population in Raunds since the 2016 estimate, due to residential urban extensions to the north, north-east and south of the town.

**Table 1 Population Data**

| Settlements     | Population (2001 Census) | Population (2011 Census) | Population (2016 estimate) | Population increase (2001-16) | % increase (2001-16) |
|-----------------|--------------------------|--------------------------|----------------------------|-------------------------------|----------------------|
| Rushden         | 25,849                   | 29,272                   | 30,282                     | 4,433                         | 17.1%                |
| Higham Ferrers  | 6,086                    | 8,083                    | 8,410                      | 2,324                         | 38.2%                |
| Irthlingborough | 7,033                    | 8,535                    | 9,112                      | 2,079                         | 29.6%                |
| Oundle          | 5,345                    | 5,735                    | 6,177                      | 832                           | 15.6%                |
| Raunds          | 8,275                    | 8,641                    | 8,809                      | 534                           | 6.5%                 |
| Thrapston       | 4,855                    | 6,239                    | 6,361                      | 1,506                         | 31.0%                |
| <b>TOTAL</b>    | <b>57,443</b>            | <b>66,505</b>            | <b>69,151</b>              | <b>11,708</b>                 | <b>20.4%</b>         |

- 2.5 The Plan sets out similar information for the rural areas, recognising the contrasting geographical characteristics within the district. It also notes the implications of Neighbourhood Plans which have been “made” (adopted) since 2016.

## Urban areas

### Rushden: Growth Town

- 2.6 Rushden, once described as an ‘appendage’ to Higham (*Kelly’s Trade Directory, 1854*), underwent a dramatic expansion and industrialisation in the late 19<sup>th</sup> century. A once rural village was turned in to a thriving centre for the boot and shoe industry. Many buildings, including former factories, social clubs, chapels, churches and housing, dating from the late 19<sup>th</sup> and early 20<sup>th</sup> centuries, survive and are a strong reminder of the town’s heritage. A number of buildings predate the boot and shoe boom, which glimpse the former landscape setting; these can most noticeably be seen in Rushden Hall, as well as St Mary’s Church and a number of buildings along the High Street.
- 2.7 Rushden today, whilst being the most southern town within the district, is very much the urban hub of the predominantly urban southern part of the district. It is by far the largest town within the district and has seen substantial population growth over the past 15 years, from just below 26,000 (25,849; 2001 Census) to over 30,000 (30,282; 2016 estimate). The town is flanked by a number of industrial sites to the east and west, whilst more recent housing developments have expanded the town to the south and east.
- 2.8 Rushden is designated as a Growth Town in the Joint Core Strategy (2011-2031), and is expected to undertake a significant amount of development over the Plan period. The wider town contains a mix of existing leisure facilities, businesses and services as well as forthcoming leisure, retail and business opportunities. The most notable of these include Rushden Lakes (opened in 2017, extended in 2019) and the proposed mixed use development of the Rushden East Sustainable Urban Extension, adjoining the eastern side of the town. The growth for this area is anticipated to provide for greater investment and value within Rushden.

### Rushden Neighbourhood Plan (made June 2018)

- 2.9 The Rushden Neighbourhood Plan contains a range of detailed non-strategic policies for the town and its hinterland. These policies form part of the development plan for the area, sitting alongside this Plan. They include smaller housing site allocations within the main urban area of Rushden, detailed development management policies and site specific designations such as open spaces and town centres. The Rushden Neighbourhood Plan provides a detailed policy framework for the town. It includes a number of housing land allocations within the urban area, which should deliver around 560 dwellings towards the Joint Core Strategy housing requirement for the town.

### Rushden East Masterplan Framework (2020)

- 2.10 Development of the Rushden East sustainable urban extension has been a commitment since the adoption of the Joint Core Strategy in July 2016 (Policy 33). This is a new proposal including at least 2,500 dwellings and associated jobs and facilities, reflecting the status of Rushden as a Growth Town. Policy EN29 identifies the broad location for this SUE, together with the key issues and development principles that need to be addressed as this is taken forward through master-planning.
- 2.11 An overarching vision for Rushden East was agreed by East Northamptonshire Council on 17 July 2017. Following on from this, the former Council prepared a draft Rushden

East Masterplan Framework Document (MFD). This was published in January 2020, for consultation during February – March 2020, and it was then determined that the MFD should be incorporated into the Local Plan Part 2 (Planning Policy Committee, 21 September 2020, Item 5). Following the examination of the Plan it was agreed that the MFD would be taken forward as a Supplementary Planning Document supporting Policy EN29. An updated position in respect of the MFD is provided in paragraph 9.8.

### **Higham Ferrers**

- 2.12 Higham Ferrers, the home of some of East Northamptonshire's oldest buildings, benefits from a vibrant and attractive historic core. The architecture of the Church of St Mary the Virgin, its prominent spire and the group of buildings that surround the churchyard (all Grade I Listed Buildings), add a certain theatrical zeal to the sense of place, with many positive and landmark buildings in and adjacent to the town centre and College Street (Chichele College and The Green Dragon, for instance).
- 2.13 Over the years Higham has had its fair share of notable residents and visitors. It is the birth place of Henry Chichele (Archbishop of Canterbury 1414 – 1443 and the founder of All Souls College Oxford) who established Higham Ferrers School in 1422. The Duchy of Lancaster is a key landowner in and around the town, acknowledging the town's Royal connections.
- 2.14 Higham Ferrers is the historic market town for the south of the district, having been granted a market charter in 1251. Proportionally it has undergone the largest population growth (over 38%) of the six towns within the district during the previous 15 years (2001-16); from just over 6,000 (6,086; 2001 Census) to just over 8,400 (8,410; 2016 estimate).
- 2.15 To the north of Higham, new housing developments have led to an extended settlement away from its historic core. This has resulted in a closer physical link to Irthlingborough, although physically separated by the A45/ A6 Chowns Mill roundabout and the 20<sup>th</sup> century Irthlingborough viaduct, over the River Nene.

### **Higham Ferrers Neighbourhood Plan (made April 2016)**

- 2.16 The Higham Ferrers Neighbourhood Plan was the first in the district to be "made" (adopted). This sets out a range of site specific proposals and designations, including the town centre, local green space, main employment areas, proposed Greenway extensions and provides a strategic housing land allocation of 300 dwellings to the east of Ferrers School.

### **Irthlingborough**

- 2.17 Irthlingborough is separated from the other southern urban centres of Rushden, Higham Ferrers and Raunds by the River Nene. It was historically involved in the iron and gravel mining industry and much of the surrounding landscape is shaped by this historic activity. The growth of the town during the 20<sup>th</sup> Century was, in part, shaped by the extensive mine workings between Irthlingborough and Finedon, which present ongoing issues of ground stability to the west of the town. The Church of St Peter, with its distinctive lantern tower, dominates the sky line and holds dominion over the north side of the Nene Valley.
- 2.18 Whilst Irthlingborough has a historic association with excavation and the landscape is well related to this, much like the other towns in the south of the district, industrialisation

due to the boot and shoe industry resulted in a quick expansion from a farming community to a town. The boot and shoe trade developed from an aspect of the community in the 18<sup>th</sup> century to being fully established and a prominent aspect of the town's economy by the late 19<sup>th</sup> century.

- 2.19 Irthlingborough has seen significant population growth (approximately 30%) over the previous 15 years (2001-16). The population has increased from just over 7,000 (7,033; 2001 Census) to just over 9,100 (9,112; 2016 estimate).
- 2.20 Most of the growth in Irthlingborough proposed over the next 15 years (i.e. during the remainder of the current Plan period), will be delivered through the proposed sustainable urban extension (700 dwellings and associated employment, services and infrastructure) to the west of the town. Approval was granted in 2014, although discussions continue around development contributions. This and other smaller commitments to the east (Attley Way) and west (Wellingborough Road), combined with recent developments at the former Sunseeker Caravan site (Finedon Road) and Crow Hill (to the north of the main urban area), have expanded and will continue to grow the town throughout the Plan period. Annual monitoring will indicate whether any further development land allocations are needed to meet the requirement for the town as set out in the Joint Core Strategy (Policy 29, Table 5).

### **Emerging Irthlingborough Neighbourhood Plan**

- 2.21 Irthlingborough Town Council applied to prepare a Neighbourhood Plan in 2014; the Neighbourhood Area designation was confirmed in December 2014. In February 2020 the Irthlingborough Neighbourhood Planning Group stated their intention to work towards Regulation 14 of the Neighbourhood Planning process during 2021, thereby re-engaging in the development of their plan.

### **Oundle**

- 2.22 Oundle is the main market town and service centre for the rural north of the district. It has functional relationships to other larger urban centres to the north and east, namely Stamford and Peterborough. The town of Oundle is located to the west of the River Nene, close to the river floodplain, situated to the south and east of the town.
- 2.23 Oundle has been settled since the Iron Age, having been a trading place and market centre for local farmers and craftsmen for at least 1,500 years. It also has significant ecclesiastical heritage; St Wilfrid set up a monastery in the 8<sup>th</sup> century, which was later replaced by the current St Peter's Church. The town underwent significant growth in the 11<sup>th</sup> and 12<sup>th</sup> centuries, such that it was then granted a market charter.
- 2.24 The town also has a longstanding academic heritage, with a grammar school first founded in 1465. Sir William Laxton, a former pupil, then founded Laxton Grammar School in 1556, which subsequently became Oundle School. These dual historic ecclesiastical and educational aspects of the town's history have combined to define the unique character of Oundle.
- 2.25 Oundle has seen some population growth during the past 15 years (2001-2016). The population has risen from just over 5,300 (5,345; 2001 Census) to nearly 6,200 (6,177; 2016 estimate) and further growth is anticipated during the remainder of the Plan period.

The population fluctuates during the year due to the presence of Oundle School, increasing by approximately 1000 students during term time.

- 2.26 Beyond the main built up area, adjacent to the River Nene, are a number of significant riparian landmarks. To the south of the town, Barnwell Country Park and the Oundle Marina retail and leisure redevelopment scheme (permitted in 2018) provide a significant opportunity to develop the town's tourist potential. Also in close proximity to the town, on the opposite bank of the River Nene, are landmark (currently vacant) heritage assets; the Riverside Hotel to the east and Barnwell Mill to the south. It will represent a key challenge for the planning system to bring these premises back into viable uses.

### **Raunds**

- 2.27 Raunds, whilst not as famous as Rushden for its boot and shoe industry history, had a boom period during the 19<sup>th</sup> century, developing from an agricultural community to a town by the early 1800s. Raunds and the surrounding area contain a number of ancient monuments as well as archaeological sites of international significance.
- 2.28 The town has particularly good road transport links; the A45 trunk road which links through to the A14, allowing easy access to the M1 and A6 to the west, and A1 to the east. As such, with Raunds being the first major settlement to the south of the A14 off the A45, the town acts as a passing gateway from the more rural northern part of the district to the urban centres in the south.
- 2.29 Today Raunds has a major strategic industrial/warehousing area to the north west of the main urban area (Warth Park). The initial development phase at Warth Park took place during the early 2000s, with major expansion (phase 2) having taken place since 2012. The town as a whole will continue to grow, with new developments already under construction to the north, north east and south of the town. These existing commitments are expected to be delivered over the remainder of the Plan period, by 2031.
- 2.30 In recent years population growth at Raunds has been limited. The population increased by 6.5% over 15 years (2001-2016), from just below 8,300 (8,275; 2001 Census) to just over 8,800 (8,809; 2016 estimate). Accelerated population growth is anticipated during the remainder of the Plan period, as the major urban extensions around the town are implemented.

### **Raunds Neighbourhood Plan (made November 2017)**

- 2.31 Raunds Neighbourhood Plan contains a range of detailed non-strategic policies for the town and its rural hinterland, many of which would otherwise be covered by this Plan. It does not allocate further development land allocations, as all of the required growth is already delivered, under construction or permitted. Instead, the Neighbourhood Plan focuses upon the re-imagining of the town centre and the retention of existing assets including employment areas, community facilities and open spaces.

### **Thrapston**

- 2.32 Thrapston is a historic market town, situated midway along the River Nene within the East Northamptonshire area. It was granted a market charter in 1205, soon after a bridge crossing the river was constructed between Thrapston and the neighbouring village of Islip on the opposite (west) bank of the river, (first recorded in 1224). The

current Nine Arches bridge is more recent, although it is likely that this was constructed as a replacement for the earlier bridge.

- 2.33 Thrapston is situated at a significant crossroad, between the Northampton – Peterborough road (A45/ A605), which follows the Nene Valley and the main east-west trunk road (now the A14) which connects east coast ports with the West Midlands conurbation (Birmingham, Coventry and the Black Country). Since the 1980s it functioned as the administrative centre for East Northamptonshire Council, largely due to its central location within the district.
- 2.34 Thrapston has seen significant population growth (over 30%) since 2001. In this 15 year period, from 2001 to 2016, the population has increased from below 5,000 (4,855; 2001 Census), to nearly 6,400 (6,361; 2016 estimate). This is largely due to major new development at Lazy Acre, on the north east side of the urban area. Development to the south of the town is mostly complete, “filling the gap” between the older built-up/ urban area and the A14.
- 2.35 Despite the significant population increase and its situation on the main strategic road network, Thrapston retains its rural character, with agriculture remaining a significant sector of the local economy. Notably the town retains its cattle market, the sole remaining livestock market in the counties of Northamptonshire, Bedfordshire and Cambridgeshire. In common with Raunds, Thrapston is also host to a number of national logistics and distribution centres, due to its location on the strategic road network, particularly the east-west A14 and A45 trunk roads. In addition a number of businesses are located within the town, including local authority offices.

### **The rural area**

- 2.36 The district is subdivided by the A14, the main East Coast – Midlands Trunk Road. This divides East Northamptonshire between the more urban southern area and the predominantly rural northern parts of the district. Three distinctive rural sub-areas are noted:
- Nene Valley, including agricultural Claylands to the east of the River Nene;
  - Rockingham Forest – to the north west of the Nene Valley, south east of the Welland Valley and north of the A14, including the major tributaries of the River Nene (Harper’s Brook and Willow Brook); and
  - Rural hinterland for the predominantly urban southern area of the district, to the south of the A14 (also known as the Four Towns area).

### **Nene Valley**

- 2.37 The Nene Valley is the major feature which defines the whole of the district. It rises above (to the west of) Northampton and flows south west/ north east, entering the Wash at Sutton Bridge, Lincolnshire. It is a major national waterway, with the vast majority of the area of the district situated within the River Nene catchment area.
- 2.38 The importance of the River Nene to the district has long been recognised (e.g. through the River Nene Regional Park). The Nene Valley Strategic Plan (October 2010) recognised the vast variety of functions of the River Nene and sought to bring environmental, leisure, tourism, economic, planning and land use matters into a single document. This was subsequently implemented through a number of more focused



projects, such as “Destination Nene Valley” (DNV), This is a new pathfinding partnership project, aiming to build on existing frameworks to better position and promote the Nene Valley and the Nene Valley Improvement Area (NIA), designated in 2011. It is supported by the NIA business Plan, which seeks to achieve a step-change in the mechanisms for delivering nature conservation, to create a resilient ecological network along the river valley.

- 2.39 All of the six towns within the district are situated on, or are in close proximity to, the River Nene. Historically, the river has been a major communications link. The River Nene is navigable for 88 miles, between Northampton and the Wash. It was approved for navigation under a 1724 Act of Parliament, with works to make the river navigable from Peterborough upstream to Northampton. Improvements to the river were progressively implemented between then and 1761.
- 2.40 A branch of the London and Birmingham Railway was later constructed along the Nene Valley between Blisworth and Peterborough, and opened in 1845. This functioned as a secondary railway link, although an important freight route for iron ore trains was eventually closed in the 1960s. The Nene Valley has also been a major arterial road route since Roman times. Much of the A45/ A605 road link within the district (connecting Milton Keynes, Northampton, Peterborough and East Anglia) follows the route of a former Roman road.
- 2.41 Within the district, a number of villages are situated on or are in close proximity to the River Nene. These are Ringstead, Denford, Islip, Thorpe Waterville, Aldwinckle, Wadenhoe, Pilton, Lilford, Ashton, Cotterstock, Tansor, Fotheringhay, Warmington, Nassington and Yarwell. These villages also host a number of historic assets, including notable Buildings at Risk (Ashton Mill and Lilford Hall) and the nationally significant historic monument of Fotheringhay Castle.
- 2.42 The Claylands to the east of the Nene Valley also include a number of nationally important sites of historic interest. In 2010, the Ashton Estate (with Ashton Wold) was designated a Grade II Park and Garden under the Register of Historic Buildings and Ancient Monuments Act 1953 for its special historic interest, having been developed by the Rothschild family as a model agricultural estate in the late 19<sup>th</sup>/ early 20<sup>th</sup> centuries. Other important features to the east of the Nene Valley include Barnwell Castle, first built in the 12<sup>th</sup> century and subsequently used as a Royalist arsenal in the Civil War. The landscape of the Claylands is defined by its open character, extensive views and intensive agricultural economy.
- 2.43 Overall, the Nene Valley and Claylands to the east include a number of significant heritage assets, some of national importance (e.g. Fotheringhay Castle, Ashton Estate). To the south (upstream) of Thorpe Waterville, much of the Nene Valley is covered by the Upper Nene Valley Gravel Pits SPA/ Ramsar site, an internationally important habitat for migrating winter birds. The Plan, with reference to the various Nene Valley strategies, should accommodate the (sometimes) competing roles of tourism, heritage and the natural environment.

### **Rockingham Forest and Welland Valley**

- 2.44 To the west of the River Nene, the largest geographical area of the rural part of the district is defined by the Rockingham Forest. This area was designated a royal hunting forest in the 11<sup>th</sup> century, a role which continued until the 19<sup>th</sup> century. Despite this

designation the area was not extensively forested; the name arose from its royal designation.

- 2.45 The Rockingham Forest is bisected by Harper's Brook and Willow Brook, two main tributaries of the Nene, both of which flow west-east. The Rockingham Forest defines most of rural north part of the district, to the north of the A14 and west of the Nene Valley. It supports many rural communities but is closely connected to a number of urban areas; Oundle and Thrapston to the east, Corby to the west and Stamford to the north.
- 2.46 Within the heart of the forest itself are a small number of larger rural settlements, some of which function as service centres for a wider rural hinterland. The larger service villages within the Rockingham Forest include Brigstock, King's Cliffe and Nassington. Easton on the Hill, just to the north of Rockingham Forest within the Welland Valley, has close functional relationships to the nearby urban centres of Stamford and Peterborough.
- 2.47 The River Welland forms a north western boundary to the Rockingham Forest. Villages such as Easton on the Hill and Collyweston are situated upon a prominent ridge which overlooks the Welland Valley. Other villages such as Duddington, Harringworth and Wakerley are defined by the Welland Valley. The Welland Valley Partnership has recently developed a vision<sup>23</sup> for the enhancement of the river valley, emphasising the resource that the river provides for the northernmost part of the district.
- 2.48 The Welland Valley is defined by a number of significant features. The Harringworth Viaduct is the longest in Britain, carrying the former Midland Railway's Nottingham – Melton – Kettering loop line. It is also defined by a number of historic stone bridges (Collyweston, Duddington and Wakerley), together with the 20<sup>th</sup> century Ketton cement works (Rutland).
- 2.49 The Rockingham Forest and Welland Valley combine to define the largest parts of the rural area of the district. The role of the Rockingham Forest is already recognised in the Joint Core Strategy (Policy 21), which identifies its role in carbon storage through the Government's Carbon Plan. The role of the Welland Valley as a defining feature for the northern part of the district should also be recognised; it is noted that the Barrowden and Wakerley Neighbourhood Plan provides some detailed local policy direction for Green Infrastructure enhancements along the Welland Valley.

### **Rural hinterland for the predominantly urban southern area**

- 2.50 Whilst the southern area (south of the A14) is made up of a far denser urban core than the northern part of the district, its rural hinterland is still an intrinsic feature of the southern part of the East Northamptonshire district. Several smaller settlements are situated in close proximity to the urban centres. These vary in size from the larger villages of Stanwick and Ringstead to the smaller picturesque rural parishes of Chelveston cum Caldecott, Great Addington, Little Addington, Hargrave and Newton Bromswold.
- 2.51 Stanwick and Ringstead both benefit from local facilities, typical of villages of their size (e.g. convenience store, post office, fast food takeaway and a pub). These primarily

---

<sup>23</sup> <https://www.gov.uk/government/publications/the-welland-valley-partnership-enhancing-the-river-welland>

serve local needs, however travel out of these villages is necessary for other local amenities. The two villages benefit from their own primary schools. Stanwick also has a large recreation ground that adjoins the north eastern end of the village, which offers sporting provision. Just outside the village, west of the A45, is Stanwick Lakes, a large nature reserve with a visitor centre and walking, cycling and leisure opportunities. To the west of Ringstead is the Willy Watt Marina, a site for mooring boats, as well as providing camping opportunities.

2.52 Also within this southern area are the freestanding villages of Chelveston, Great Addington, Little Addington, Hargrave and Newton Bromswold. Chelveston cum Caldecott parish is divided into three separate settlements: Chelveston, Caldecott and Chelston Rise. Each village has its own distinctive character set within the rural heartland of the southern area. Whilst amenities are limited in these villages, their rural location and isolation is part of their charm and attraction to residents.

### **Rural area Neighbourhood Plans**

2.53 Several communities, led by Parish Councils, have taken advantage of the opportunities that Neighbourhood Plans offer, to develop distinctive local spatial visions and planning policies. The following rural area Neighbourhood Plans are “made” (adopted):

- Barnwell (February 2023)
- Barrowden and Wakerley (December 2019)
- Brigstock (January 2019)
- Chelveston cum Caldecott (July 2017)
- Glapthorn (July 2018);
- Hargrave (August 2022)
- King’s Cliffe (October 2019)
- Ringstead (August 2022)
- Stanwick (July 2017)
- Warmington (December 2019)

2.54 Elsewhere a number of Neighbourhood Plans have reached significant milestones and contain detailed site specific policies, including development land allocations and designations such as Local Green Space and settlement boundaries. This Plan should recognise and complement extant policies from made, and future, emerging Neighbourhood Plans.

## 3.0 Vision and Outcomes

- 3.1 The Plan's Vision and Outcomes were informed by the Council's Corporate Plan (2016-2019). The Corporate Plan, is normally reviewed every 3-4 years. As the North Northamptonshire Council was formed on 1 April 2021, it will be a priority for the new unitary authority to update the Corporate Plan to set future priorities.
- 3.2 The Corporate Plan set out a vision for the former East Northamptonshire Council: "*Working with our communities to sustain a thriving district*". Underpinning this vision, the corporate priorities are:
- **Sustainable development** – recognising continuing demand for housing in the area, the need for growth and the benefits it can bring, particularly in helping to revitalise the town centres; supporting sensible levels of growth while preserving the character of our historic towns and villages;
  - **Regeneration and economic development** – securing improvements to the quality of the town centres, working with the private sector to bring investment into the area, reverse the decline of some towns and work with communities to achieve their aspirations for their local area;
  - **Financial stability** – control costs, provide value for money services and building effective partnerships; and
  - **Customer focused services** – improve the quality of information and services to maximise delivery of online services, while working closely with partners to recognise the needs of the most vulnerable communities.
- 3.3 It is noted that the priorities of sustainable development, and regeneration and economic development are particularly relevant to the Plan. The Local Plan Vision and Outcomes will recognise these key challenges and opportunities.

### The Vision

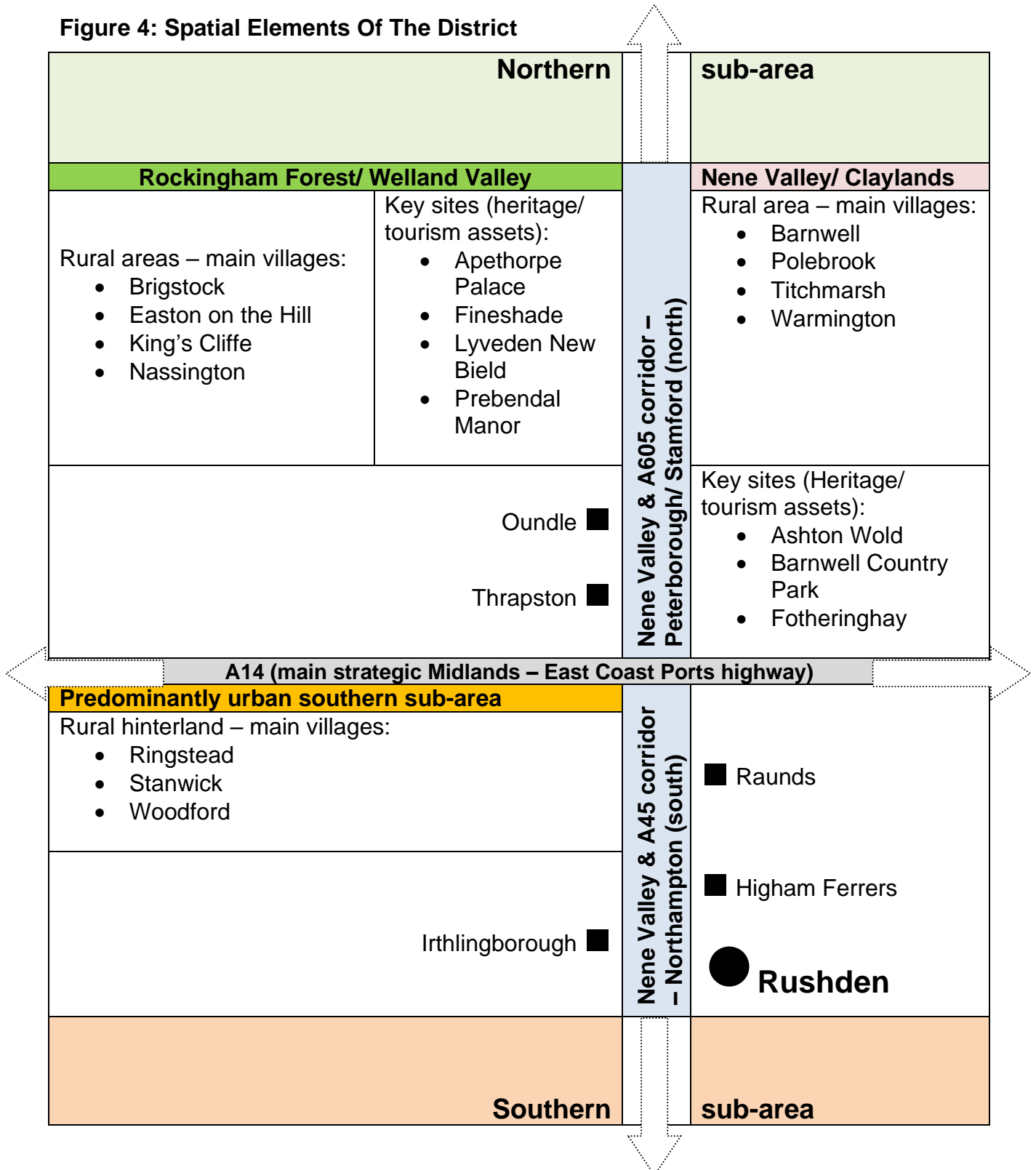
- 3.4 The Joint Core Strategy defines an overarching Vision, for the whole of the North Northamptonshire area. It also sets out an East Northamptonshire specific Vision.

East Northamptonshire will be the heartland of small and medium sized enterprises, based on regenerated and thriving market towns with an enhanced role for Rushden as the District's Growth Town. Implementation of the consented development at Rushden Lakes will have provided a new out of centre retail and leisure offer serving residents in the southern area of North Northamptonshire and delivering significant environmental benefits in the Nene Valley. Diverse, sustainable villages and a living, working countryside will provide the backdrop for tourism, creative industries and low carbon businesses to locate at the meeting point of the Nene Valley and Rockingham Forest.

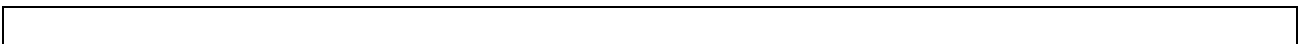
- 3.5 The Plan will aim to identify those aspects of the Joint Core Strategy Vision that should be developed further, and to develop the spatial elements of this vision. This should recognise the diverse aspects of the Plan area, with particular reference to the northern

and southern functional sub-areas (Joint Core Strategy, Figure 17). Figure 4 (below) identifies the key spatial elements that make up the East Northamptonshire area.

**Figure 4: Spatial Elements Of The District**



3.6 The Plan sets out three distinctive sub-area Visions which, together with the Vision of the Joint Core Strategy, will provide an overall spatial Vision for East Northamptonshire.



**Rockingham Forest/ Welland Valley:**

- A focus for managing climate change, delivering carbon storage through re-forestation, and balancing this through ecosystem services, delivering sustainable tourism, informal leisure and new carbon-efficient businesses.
- The function of Oundle and Thrapston as key service centres for Rockingham Forest and focal points for growth in the Forest; providing a buffer between the “green” (forest) and “blue” (River Nene), at the heart of the district.

**Nene Valley/ Claylands:**

- The Nene Valley defines the character of the six towns within the district, and as such will be a focal point for strategic developments and “blue” tourism, to deliver water based ecosystem services and overall enhancements to tourism and the wider economy.
- The Claylands will be a focus for the rural economy, specifically sustainable agricultural businesses, and reconciling this with the “blue” infrastructure function of the Nene Valley.

**Predominantly urban southern sub-area:**

- The focal point for strategic housing and employment growth within the district, with a particular focus upon the Rushden’s Growth Town status and the successful delivery of the Rushden East and Rushden Gateway developments.
- Successful implementation and integration of the already committed major developments at the Market Towns of Higham Ferrers, Irthlingborough and Raunds.
- Reconciliation of the need to secure enhancements to the Nene Valley’s natural capital, while recognising the need to deliver the wider Local Plan growth agenda.

**Outcomes**

- 3.7 This Plan will recognise the 10 overarching outcomes of the Joint Core Strategy, setting out how these can be delivered within an East Northamptonshire context (Figure 5, below).

**Figure 5 – Local Plan Outcomes**

| Local Plan outcomes  | Links to corporate outcomes   |
|--|---|
| <p><b>1. Empowered and proactive communities</b><br/>The Plan sets out a framework for place shaping, focusing on the issues that matter to local communities and providing a context within which community led planning initiatives can flourish and prosper. It seeks to create successful, safe, strong, cohesive and sustainable communities where residents are actively involved in shaping the places where they live.</p> | <ul style="list-style-type: none"> <li>• Good quality of life – sustainable, clean, healthy, safe</li> <li>• Effective partnership working</li> <li>• Knowledge of our customers and communities</li> </ul> |

|   |   |
|---|---|
| <p><b>2. Adaptability to future climate change</b><br/>The Plan will create more sustainable places that are naturally resilient to future climate change. Carbon footprints will be minimised and sustainable transport choice will be improved. Low carbon growth will be delivered through policies that seek the highest viable standards for energy efficiency, renewable energy and sustainable construction.</p>   | <ul style="list-style-type: none"> <li>• Good quality of life – sustainable, clean, healthy</li> <li>• Effective partnership working</li> <li>• Effective management</li> </ul>   |
| <p><b>3. Distinctive environments that enhance and respect local character and enhance biodiversity</b><br/>The Plan sets out a framework for retaining the area’s distinctiveness, by maintaining and enhancing landscape and townscape character. It promotes an integrated approach to biodiversity management and a net gain in Green Infrastructure, strengthening links between the countryside and the towns.</p>  | <ul style="list-style-type: none"> <li>• Good quality of life – sustainable, clean, healthy</li> <li>• Effective partnership working</li> </ul>   |
| <p><b>4. Excellent services and facilities easily accessed by local communities and businesses</b><br/>The Plan establishes the priorities for future public and private investment and collaboration. It will help to secure provision of the infrastructure, services and facilities needed to sustain and enhance communities and support new development.</p>   | <ul style="list-style-type: none"> <li>• Good quality of life – prosperous, sustainable, clean, healthy, safe</li> <li>• Effective partnership working</li> <li>• Effective management</li> <li>• Knowledge of our customers and communities</li> </ul> |
| <p><b>5. A sustainable balance between local jobs and workers and a more diverse economy</b><br/>The Plan provides for the workplaces, jobs, skills and sites to help build a more diverse, dynamic and self-reliant economy; one which is not overly dependent on in or out commuting. Higher skilled jobs will be facilitated through improved further education provision and enterprise and innovation will be enabled through next generation digital connectivity. Provision will be made to capitalise upon existing sectoral strengths in creating a stronger, greener economy.</p> | <ul style="list-style-type: none"> <li>• Good quality of life – prosperous, sustainable</li> <li>• Effective partnership working</li> <li>• Effective management</li> </ul>   |
| <p><b>6. Transformed connectivity</b><br/>The Plan seeks transformed connectivity at all levels. It sets out measures to enhance Neighbourhood Connectivity, establishes the requirement for inter urban transport links and for improvements to the strategic road network and main-line rail connections. It identifies the growth locations that will provide connections to and support the longer-term opportunity for the Northamptonshire Arc Rapid Transit network.</p>   | <ul style="list-style-type: none"> <li>• Good quality of life – prosperous, sustainable</li> <li>• Effective partnership working</li> </ul>   |
| <p><b>7. More walkable places and an excellent choice of ways to travel</b><br/>The Plan identifies the actions needed in order to make walking the first choice of transport to local services and jobs including increasing connectivity to and from</p>  | <ul style="list-style-type: none"> <li>• Good quality of life – sustainable, healthy</li> <li>• Effective partnership working</li> </ul>  |

|  |   |
|--|---|
| <p>new development and the countryside and centres and ensuring that developments allow movement through them. It makes the links to the Local Transport Plan for the county, which identifies improvements to public transport, cycling networks and travel information that will encourage a shift away from car use in the towns and increase transport choice in the rural area.</p>   |   |
| <p><b>8. Vibrant, well connected towns and a productive countryside</b><br/> The Plan proposes sustainable urban-focused development and a proactive approach to meeting rural needs, supporting greater self-reliance for the area as a whole. The network of settlements will be strengthened through transformed public transport services within the north-south urban spine and out to the market towns in the east, with demand responsive services in the rural areas. Superfast broadband will support rural businesses, enable more working from home and assist the development of local food and fuel supply chains.</p>              | <ul style="list-style-type: none"> <li>• Good quality of life – prosperous, sustainable</li> <li>• Effective partnership working</li> </ul>   |
| <p><b>9. Stronger, more self-reliant towns with thriving centres</b><br/> The Plan proposes the regeneration of town centres and of older parts of towns; will help to maximise the use of brownfield land for new development and inspire community confidence in the need for positive change. Implementation of the consented Rushden Lakes development will provide an additional retail and leisure focus serving the southern area, complementing Rushden and Wellingborough town centre, which will diversify and strengthen their convenience retail provision and cultural offers.</p>  | <ul style="list-style-type: none"> <li>• Good quality of life – prosperous, sustainable</li> <li>• Effective partnership working</li> </ul>   |
| <p><b>10. Enhanced quality of life for all residents</b><br/> The Plan identifies the quality and mix of housing needed to meet the full, objectively assessed needs of the housing market area, ensuring that a sufficient proportion is affordable and accessible to all. It supports initiatives that build stable, safe, healthy and strong communities, which means respecting cultural diversity and distinctiveness; planning new development to help reduce crime, anti-social behaviour and the fear of crime; promoting well-being and health; ensuring that development is of local character; and supporting area based renewal.</p> | <ul style="list-style-type: none"> <li>• Good quality of life – sustainable, clean, healthy, safe</li> <li>• Effective partnership working</li> <li>• Effective management</li> <li>• Knowledge of our customers and communities</li> </ul> |

## Presumption in favour of sustainable development

- 3.8 The “presumption in favour of sustainable development” is a national planning policy requirement, set out in the National Planning Policy Framework (NPPF). It should therefore underpin the planning system at all levels and has been taken into account in preparing this Plan.



- 3.9 The Joint Core Strategy has sought to define this within the context of North Northamptonshire (Policy 1).
- 3.10 The Development Plan must be read as a whole, and planning applications will be determined in accordance with the Development Plan.

## 4.0 Spatial Development Strategy

- 4.1 The Joint Core Strategy sets out the overarching role that the urban and rural areas within North Northamptonshire will have in delivering the overall Local Plan vision. In order to provide a more detailed, local direction for the district, this Plan sets out a bespoke local spatial strategy for the Plan area; this will complement that set out in the Joint Core Strategy.
- 4.2 Joint Core Strategy Table 1 and Policy 11 define the overall spatial role for the urban and rural areas. Table 2 (below) explains settlement roles for the Plan area, applying Joint Core Strategy Table 1 within the context of this Plan.

| <b>Category</b>  | <b>Location</b>   | <b>Role</b>   |
|------------------|---|---|
| Growth Towns     | Rushden   | To provide the focus for major co-ordinated regeneration and growth in employment, housing, retail and higher order facilities.   |
| Market Towns     | Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston   | To provide a strong service role for their local community and wider rural hinterland.<br><br>Higham Ferrers to provide a more localised convenience and service role, with growth pressures directed to the adjoining Growth Towns.  |
| Villages         | Villages other than settlements of a dispersed form, which may be designated as open countryside, outside the formal settlement hierarchy | To provide community infrastructure and services to meet day to day needs of residents and businesses in the rural areas. Focal points for development to meet locally identified needs, unless those needs can be met more sustainably at a nearby larger settlement.            |
| Open countryside |   | A living, working countryside providing the green setting for the network of settlements and supporting the area's self-reliance and resilience through food production; leisure and tourism; biodiversity resources; renewable energy; flood risk management and carbon capture. |

- 4.3 Significant strategic commitments such as Rushden East, Irthlingborough West and future development phases around Rushden Lakes (e.g. Rushden Gateway) will be delivered in accordance with approved masterplans, as required by relevant policies in the Joint Core Strategy (e.g. policies 33 and 35), or in accordance with extant planning permissions. Later development phases of major committed sites at Raunds and Thrapston will continue to be delivered in line with approved plans.
- 4.4 Aside from for the six urban areas, the Joint Core Strategy does not define specific spatial development strategies for individual settlements. For this Plan to provide a distinctive local vision, it is necessary to set out a more specific local approach for the district.

## Spatial approach for the urban areas

- 4.5 As indicated above, the Joint Core Strategy (Table 1) sets out specific spatial development strategies for each of the six East Northamptonshire area towns. This recognises that:
- **Rushden**, as the Growth Town, is the major focus for new development;
  - **Irthlingborough and Raunds** were the focus for growth in the previous (2008) Core Strategy, and the emphasis of the current Joint Core Strategy is the regeneration of these two Market Towns and their local service role;
  - **Higham Ferrers**, due to its proximity and relationship with Rushden (its larger neighbour and designated Growth Town), has a localised service role, with local growth pressures directed to Rushden;
  - **Oundle** is regarded as having a successful town centre (Joint Core Strategy Table 1), so the focus for this Plan should be to consolidate and enhance the role of the town;
  - **Thrapston** was a focus for regeneration through for the previous Local Plan (2008 Core Strategy and 2011 RNOTP), while the current Joint Core Strategy emphasises its local service role and ongoing regeneration.
- 4.6 Policy 29 (Table 5) of the Joint Core Strategy distributes housing requirements with reference to the overall spatial strategy (Policy 11), constraints and/ or existing commitments. A large portion of the overall North Northamptonshire development requirement is already committed (i.e. under construction or having extant planning permission), largely a reflection of the strategy for growth set out in the previous (2008) Core Spatial Strategy. Table 3 (below) demonstrates the percentages of the Joint Core Strategy requirement for the six urban areas (7,580 dwellings, 2011-2031) allocated to each town.

**Table 3 Distribution of housing requirements (urban areas)**

| (extracted from Joint Core Strategy/ JCS Table 5) | Settlements     | Local Plan housing requirement (2011-31) | Percentage of total JCS requirement |
|---|-----------------|--|-------------------------------------|
| Growth Town                                       | Rushden         | 3,285                                    | 43.3%                               |
| Market Towns                                      | Higham Ferrers  | 560                                      | 7.4%                                |
|   | Irthlingborough | 1,350                                    | 17.8%                               |
|   | Raunds          | 1,060                                    | 14.0%                               |
|   | Thrapston       | 680                                      | 9.0%                                |
|   | Oundle          | 645                                      | 8.5%                                |
| <b>TOTAL</b>                                      |                 | <b>7,580</b>                             | <b>100.0%</b>                       |

- 4.7 Policy 11 of the Joint Core Strategy provides a distinction between the overall development strategy for the urban areas (Policy 11(1)) and rural areas (Policy 11(2)). This Plan acknowledges this differentiation, through proposing clear settlement boundary criteria, the aim of which is to provide a distinction between the urban areas and the surrounding rural hinterland.

## Upper Nene Valley Gravel Pits SPA/ Ramsar site Mitigation Strategy

- 4.8 The potential impacts of the planned levels of housing growth upon the Upper Nene Valley Gravel Pits (UNVGP) SPA/ Ramsar site are recognised in the Joint Core Strategy. Natural England highlighted the potential cumulative impacts of visitor pressures upon the SPA/ Ramsar site from residential development within 3km of the designated sites. Policy 4(d) sets out the range of mitigation measures, including effective monitoring, that will be necessary to fulfil the requirements of the updated (2017) Habitat Regulations.
- 4.9 To this end, the SPA Mitigation Strategy was adopted as an addendum to the UNVGP SPA Supplementary Planning Document (SPD) in November 2016. The SPA SPD provides a legal mechanism by which a per-dwelling Mitigation Strategy payment is required within the 3km SPA/ Ramsar site buffer zone. Since the adoption of the Mitigation Strategy, Natural England has emphasised the need to establish an effective mechanism for monitoring how this has been working (Joint Core Strategy Policy 4(d)(iv)). This review will focus upon the effectiveness of mitigation measures as these are implemented.

### Spatial approach for the rural areas

- 4.10 The Joint Core Strategy sets out a generic spatial development strategy for all established villages, focussing upon development that meets a locally identified need. It must be recognised however, that rural settlements within the Plan area vary greatly in character, function and role. The Plan will therefore give recognition to the variety of settlements throughout the rural areas.
- 4.11 Assessments of rural settlements beyond the main urban areas are summarised in the rural Settlement Hierarchy Background Paper (BP1)<sup>24</sup>, with more detailed analysis set out in the Rural Settlement Hierarchy Technical Paper<sup>25</sup>. This process has revealed four distinct rural settlement typologies:
- Large freestanding villages
  - Small freestanding villages
  - Urban outliers
  - Rural outliers
- 4.12 The Plan seeks to enhance the rural spatial strategy set out in Policy 11(2) of the Joint Core Strategy by identifying a more detailed settlement hierarchy, based on local evidence, to guide planning decisions and Neighbourhood Plan progression. The Plan therefore seeks to set out a clearly distinctive and local application of the Joint Core Strategy approach to the different typologies of rural settlement, as set out in Table 4 (below).

---

<sup>24</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12120/background\\_paper\\_1\\_-\\_settlement\\_hierarchy](https://www.east-northamptonshire.gov.uk/downloads/file/12120/background_paper_1_-_settlement_hierarchy)

<sup>25</sup> [https://www.east-northamptonshire.gov.uk/downloads/download/5048/technical\\_paper\\_rural\\_settlement\\_hierarchy\\_january\\_2021](https://www.east-northamptonshire.gov.uk/downloads/download/5048/technical_paper_rural_settlement_hierarchy_january_2021)

| <b>Table 4: Functional roles for rural settlements</b>  |   |   |
|---|---|---|
| <b>Category/ settlement</b>   | <b>Roles include:</b>   | <b>Generic characteristics</b>  |
| <b>Large freestanding villages:</b> <ul style="list-style-type: none"> <li>• Brigstock</li> <li>• Easton on the Hill</li> <li>• King's Cliffe</li> <li>• Nassington</li> <li>• Ringstead</li> <li>• Stanwick</li> <li>• Warmington</li> <li>• Woodford</li> </ul> | <ul style="list-style-type: none"> <li>• Focal points for community infrastructure and services within the locality;</li> <li>• Local services and facilities may serve a cluster or network of rural settlements;</li> <li>• Emphasis upon development to meet locally occurring needs.</li> </ul> | <ul style="list-style-type: none"> <li>• Population &gt;1000;</li> <li>• Local services and facilities – primary school, pub, Post Office, convenience retailer;</li> <li>• Defined by rural Parish, but serving a localised network of rural villages.</li> </ul>  |
| <b>Small freestanding villages:</b> <ul style="list-style-type: none"> <li>• Most villages (Listed in Table 5)</li> </ul>   | <ul style="list-style-type: none"> <li>• Limited community infrastructure and facilities;</li> <li>• Emphasis upon smaller scale locally significant development opportunities where these are necessary to fulfil a defined local need.</li> </ul>   | <ul style="list-style-type: none"> <li>• Population &lt;1000;</li> <li>• Limited local services and facilities – 1-2 local services e.g. primary school, pub etc</li> <li>• Generally defined by rural Parish, with a Church of England Parish Church.</li> </ul>   |
| <b>Urban outliers:</b> <ul style="list-style-type: none"> <li>• Crow Hill (Irthlingborough)</li> <li>• Elmington/ Laxton Drive (Oundle)</li> <li>• Avenue Road/ Bedford Road/ Newton Road (Rushden)</li> </ul>  | <ul style="list-style-type: none"> <li>• Limited community infrastructure and facilities;</li> <li>• Specific character areas – emphasis upon small scale managed infill development within the existing built form.</li> </ul>   | <ul style="list-style-type: none"> <li>• Urban/ suburban character;</li> <li>• Development management in accordance with an appropriate bespoke criteria-based policy;</li> <li>• May be regarded as part of a larger/ main urban area, or functional communities in their own right.</li> </ul>  |
| <b>Restraint villages/ rural outliers (Open Countryside):</b> <ul style="list-style-type: none"> <li>• Armston</li> <li>• Ashton</li> <li>• Wigsthorpe</li> <li>• Wakerley</li> <li>• Various other groups of outlying buildings, or hamlets</li> </ul>           | <ul style="list-style-type: none"> <li>• Few/ no community infrastructure and facilities;</li> <li>• Small groups of properties serving 1-2 rural businesses.</li> </ul>  | <ul style="list-style-type: none"> <li>• Clusters of rural properties in open countryside locations, or special historic conservation interest (Ashton);</li> <li>• Close functional relationship to a larger village (Wakerley);</li> <li>• Development management in accordance with Open Countryside policies; or</li> <li>• Are normally regarded as part of a wider network of rural communities, rather than freestanding settlements.</li> </ul> |

4.13 The Joint Core Strategy (Table 5) sets out an overall rural housing requirement for 820 dwellings for East Northamptonshire. This district-wide requirement is expected to be delivered through small scale infill development, 'rural exceptions' schemes and/ or Neighbourhood Plan allocations. It should be noted that the overall requirement should be distributed across approximately 50 villages within the district, so the numbers of units anticipated to be delivered to individual villages is likely to be modest and could expect to be accommodated without the need for specific strategic site allocations being proposed in the Plan.

### **Large freestanding villages**

4.14 The eight largest freestanding villages within the district are significantly larger than other villages located in East Northamptonshire. These are identified as large villages; each

having a substantive range of services and facilities. In many cases these serve a wider local cluster or network of rural settlements and may have the capacity to accommodate additional local growth, where, for example, promoted through neighbourhood planning.

### Small freestanding villages

- 4.15 The majority of villages throughout the district are small freestanding communities. In most cases these are long established communities, normally centred upon a (Church of England) Parish Church or historic core. Neighbourhood Plans may seek to promote growth as a way to sustain or improve local services. Otherwise, development will be limited to small scale infill developments and/ or ‘rural exceptions’ affordable housing schemes.

### Functional relationships between freestanding villages and nearby urban areas

- 4.16 Some of the larger freestanding villages, including three of the designated large villages (Easton on the Hill, Ringstead and Stanwick), together with others such as Glapthorn and Islip, have a close functional relationship with a nearby urban area. This is recognised in the Joint Core Strategy, which states that: *“Development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement”*.

| Village            | Nearby urban area |
|--------------------|-------------------|
| Easton on the Hill | Stamford          |
| Ringstead          | Raunds            |
| Stanwick           | Raunds            |
| Glapthorn          | Oundle            |
| Islip              | Thrapston         |

- 4.17 In these circumstances, the need to direct development to the nearby urban area is therefore explicitly recognised in the adopted spatial strategy and reflected in the “made” Neighbourhood Plans for Glapthorn and Stanwick, both of which recognise this issue and set policies to avoid coalescence with the adjoining urban area.
- 4.18 Of all the freestanding villages in these circumstances, Islip is the most physically and functionally connected to a larger urban centre (Thrapston). Nevertheless, Islip is separated from Thrapston by a physical boundary (River Nene), but it is clearly a self contained community with a range of services and facilities appropriate to a village of its size and population.

### Urban outliers

- 4.19 Urban outliers are built up areas with urban or suburban elements that are physically separated from the main built up areas of their respective towns, but are not historically considered freestanding communities or settlements. Three urban outliers have been identified within the district:
- Crow Hill (Irthlingborough)
  - Elmington/ Laxton Drive (Ashton Parish/ Oundle) and
  - Avenue Road/ Bedford Road/ Newton Road ribbon development (Rushden)

- 4.20 **Crow Hill** – Crow Hill has a predominantly urban/ suburban character. As such this area is regarded as “urban”, for the purposes of applying the spatial development strategy. It is part of the main urban area and is therefore covered by Policy EN1(1) (below) and Policy 11(1) of the Joint Core Strategy.
- 4.21 **Elmington/ Laxton Drive** – The Elmington/ Laxton Drive area, which is located within the parish of Ashton, includes both rural and suburban parts. It is physically separated from Oundle by the River Nene and overall is considered to be predominantly rural in character. It does not, however, have the necessary characteristics for a functional settlement, so is accordingly considered to be “open countryside”. Therefore, Policy EN1(3) and Policy 11(2) of the Joint Core Strategy will apply.
- 4.22 **Avenue Road/ Bedford Road/ Newton Road** – The Avenue Road/ Bedford Road/ Newton Road ribbon development is a significant area of suburban character to the south-east of the main built up area of Rushden. The Rushden Neighbourhood Plan defines the area as part of Rushden’s rural hinterland, setting out a specific spatial strategy in Policy H1. Therefore, Policy H1 of the Neighbourhood Plan and Policy 11(2) of the Joint Core Strategy will apply.

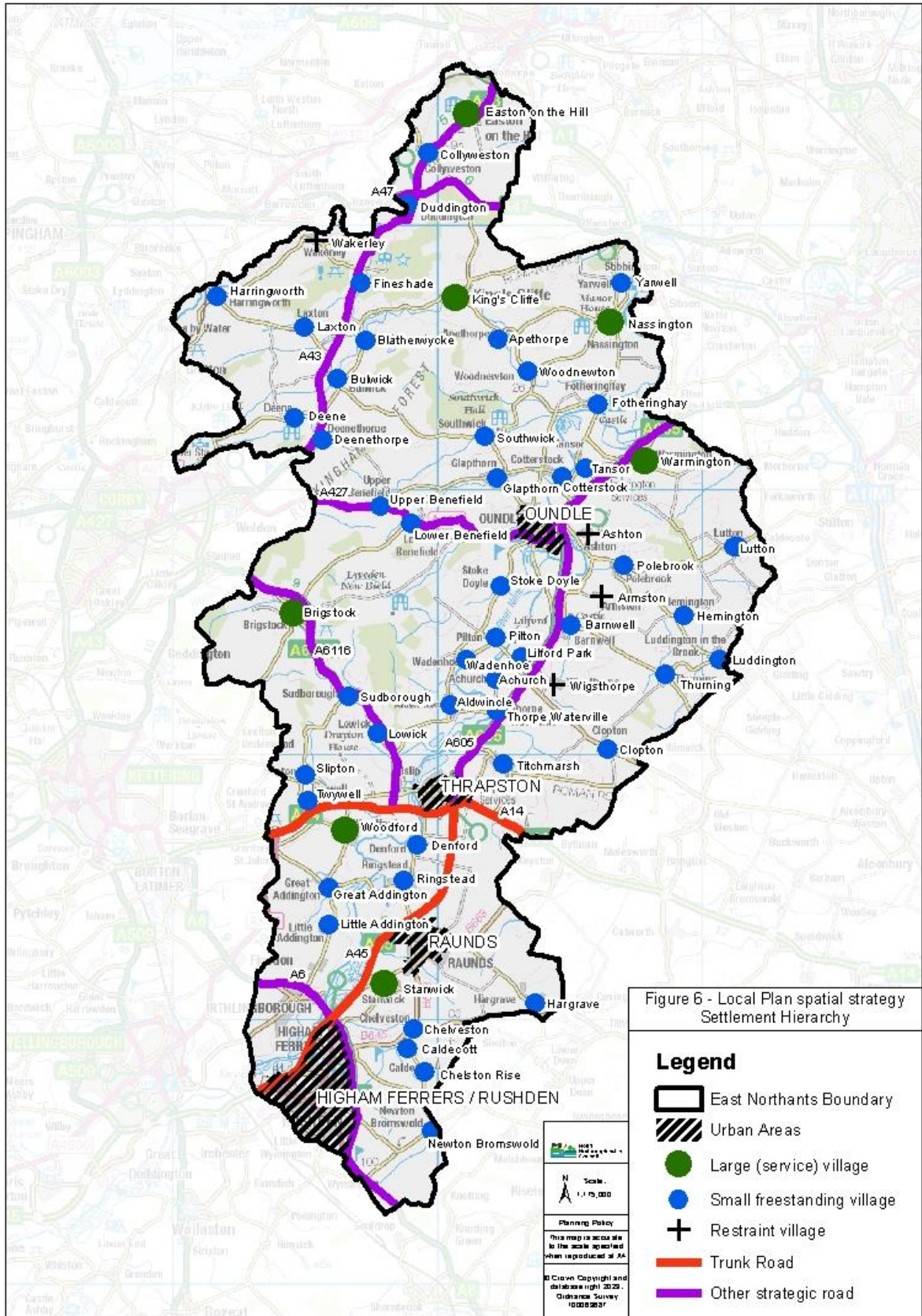
### **Restraint villages**

- 4.23 Four settlements are identified where policies of development restraint should be applied:
- Armston
  - Ashton
  - Wakerley and
  - Wigsthorpe
- 4.24 Armston and Wigsthorpe, while recognised as rural settlements within the settlement hierarchy, are hamlets of a size and rural character, such that open countryside policies will apply. For Wakerley, the emerging Neighbourhood Plan has assessed the character and built form of the village, but has concluded this to be unsuitable to accommodate further infill development.
- 4.25 The historic character of Ashton has undergone a detailed assessment through the Ashton Conservation Area Appraisal and Management Plan (July 2017). This found that the character and special interest of Ashton and the Ashton Wold rural outlier is highly sensitive and therefore its capacity for change in the form of new development is very limited. As such development opportunities are limited on account of their prevailing architectural character and spatial form, while most of the historic stock of ancillary buildings within the village has already been converted. Therefore, this historic character is of such sensitivity that the Plan should recognise this by way of a policy of development restraint, whereby open countryside policies (Policy EN1(3), below) should apply.
- 4.26 For the purposes of applying the spatial strategy through development management, the defined villages (large villages, small villages and restraint villages) are specified in Table 5 and Figure 6 (below).

| <b>Table 5: Defined villages</b>             |                         |                   |
|--|-------------------------|-------------------|
| <b>Large freestanding (service) villages</b> |                         |                   |
| Brigstock                                    | Nassington              | Warmington        |
| Easton on the Hill                           | Ringstead               | Woodford          |
| King's Cliffe                                | Stanwick                |                   |
| <b>Small freestanding (other) villages</b>   |                         |                   |
| Achurch                                      | Duddington              | Newton Bromswold  |
| Aldwinckle                                   | Fineshade               | Pilton            |
| Apethorpe                                    | Fotheringhay            | Polebrook         |
| Barnwell                                     | Glapthorn               | Slipton           |
| Benefield (Lower and Upper)                  | Great Addington         | Southwick         |
| Blatherwycke                                 | Hargrave                | Stoke Doyle       |
| Bulwick                                      | Harringworth            | Sudborough        |
| Clopton                                      | Hemington               | Tansor            |
| Caldecott                                    | Islip                   | Thorpe Waterville |
| Chelston Rise                                | Laxton                  | Thurning          |
| Chelveston                                   | Lilford                 | Titchmarsh        |
| Collyweston                                  | Little Addington        | Twywell           |
| Cotterstock                                  | Lowick                  | Wadenhoe          |
| Deene  | Luddington in the Brook | Woodnewton        |
| Deenethorpe                                  | Lutton                  | Yarwell           |
| <b>Restraint villages</b>                    |                         |                   |
| Armston                                      | Wakerley                |                   |
| Ashton                                       | Wigsthorpe              |                   |



**Figure 6: Local Plan spatial strategy – settlement hierarchy**



## **Open countryside**

- 4.27 The open countryside includes many hamlets, agricultural complexes and other isolated groups of dwellings ('rural outliers'). Specifically, it also includes four defined villages – Armston, Ashton, Wakerley and Wigsthorpe – where policies of development restraint (i.e. open countryside policies) should be applied.
- 4.28 In practice this Plan regards the defined restraint villages and other rural outliers to be open countryside, where policies such as a general presumption against new build residential development should apply. However, where applicable, Neighbourhood Plans may provide the opportunity to adopt specific local spatial development strategies regarding the role of individual rural outliers or other groups of rural buildings in the open countryside, away from established settlements. Some Neighbourhood Plans have already taken a lead in this regard.
- 4.29 Policies EN1 and EN2 (below) explain how the spatial development strategy should apply. The policies provide additional district-level direction to support the development management process, or provide further strategic direction for the preparation of Neighbourhood Plans.

### **Policy EN1: Spatial development strategy**

**Development proposals will respect the network of settlements across the district, in accordance with the spatial roles set out in the Joint Core Strategy (Table 1) along with local considerations for assessing development proposals set out below and through Policy EN2 and the supporting text.**

**Settlements within the Plan area vary greatly in character, function and role. To provide greater clarity as to how the Spatial Strategy will be applied within East Northamptonshire, informed through Tables 4 and 5 of this Plan, the following approach will set out a context for development proposals:**

#### **1. Urban Areas**

- a) **Rushden – Rushden will be the focus for major development, as the designated Growth Town, concentrated upon the delivery of the Rushden East Sustainable Urban Extension and land to the east of the A6/Bedford Road (Policy EN28).**
- b) **Higham Ferrers, Irthlingborough, Raunds, Thrapston and Oundle**  
**Development will be focussed upon the major committed development sites at Irthlingborough (including Crow Hill), Raunds, and Thrapston. Development at Higham Ferrers will take place within the current built up area of the town with additional locally arising development needs directed towards Rushden. Development at Higham Ferrers will take place within the current built up area of the town with additional locally arising development needs directed towards Rushden. Further development at these towns will focus upon urban re-imagination, to support job creation, regeneration and to secure and enhance the local service base.**

**At Oundle, development proposals will seek to deliver the allocated sites to meet**

the Joint Core Strategy requirements for the latter half of the Plan period (2021-2031), to enhance Oundle's role as the main service centre for the rural north of the District.

## **2. Freestanding Villages**

To help maintain and strengthen local services infill development opportunities within the existing built up areas as defined through Policy EN2 and the supporting text, or a made Neighbourhood Plan, will be supported. 'Rural exceptions' affordable housing schemes (Policy EN3) or other small-scale employment and community-based proposals will also be supported. Further development beyond the extent of the built-up area will be resisted, unless allocated through a Neighbourhood Plan.

Within the eight larger freestanding villages (Table 4) larger scale <sup>26</sup> development opportunities may be supported where it can be demonstrated that they are necessary to fulfil a defined local need <sup>27</sup> and meet the requirements of Policy EN2, together with the supporting text, as being considered as part of the built-up area, or a made Neighbourhood Plan.

## **3. Open countryside and restraint villages**

Development will be refused for new build residential development units in locations beyond the built-up area of the settlements identified in Table 5. Development proposals for rural diversification or the re-use or conversion of rural buildings will be supported where this in accordance with Policy 11 of the Joint Core Strategy.

The four restraint villages (Armston, Ashton, Wakerley and Wigsthorpe) together with other rural outliers, are defined as open countryside. Rural diversification or the re-use or conversion of rural buildings will be supported where this in accordance with Policy 13 Section 2 of the Joint Core Strategy the relevant policy guidance.

## **Defining Built up Areas**

- 4.30 Managing development pressures around the periphery of settlements has long been a challenging issue for the planning system. The Joint Core Strategy recognises this, in particular through Policy 11 (Network of Urban and Rural Areas), which provides a clear distinction between urban areas and rural areas by setting specific urban (Policy 11(1)) and rural (Policy 11(2)) spatial strategies. It is the intention of this Plan to similarly provide a practical means to differentiate between the built up areas and their

---

<sup>26</sup> Larger scale development proposals will need to take into account the guidance set out in Table 18 (Indicative rural housing need) of the Local Plan, as well as taking into account any development that has already been provided in a settlement within the plan period.

<sup>27</sup> Locally defined needs (as referred to in the larger freestanding villages section of the Plan above) are generally defined through mechanisms such as housing needs surveys or community plans. These sites may be delivered by way of Rural Exceptions housing, Neighbourhood Plan proposals or rural diversification schemes.

surrounding rural hinterlands. Different approaches to defining settlement boundaries (i.e. the extent of the built up area) have been extensively assessed. This analysis is summarised in the Settlement Boundaries Background Paper (BP2)<sup>28</sup>, with these potential alternative approaches initially considered at the Regulation 18 consultation stage and fed back to the Council accordingly (Planning Policy Committee, 3 April 2017, Item 5).<sup>29</sup>

### Urban areas

- 4.31 There has been no consistent district-wide policy approach to defining settlement boundaries in previous Local Plans. Linear boundaries were applied for Oundle and Thrapston, while a written definition was used for Higham Ferrers, Irthlingborough, Raunds and Rushden.
- 4.32 However, it is recognised that more recently Neighbourhood Plans have considered different approaches to defining settlement boundaries:
- Higham Ferrers Neighbourhood Plan includes a written boundary<sup>30</sup>, reflecting the clear physical limits to that urban area;
  - Raunds Neighbourhood Plan does not include an explicit urban/ rural distinction; and
  - Rushden's linear settlement boundary is defined through the Rushden Neighbourhood Plan and shown on the adopted Policies Map.
- 4.33 The Joint Core Strategy sets generic criteria for defining the built up areas of villages (paragraph 5.17):
- Vacant and under-developed land within the main built-up area;
  - Bounded by existing built curtilages on at least two sides, such as the filling in of a small gap in an otherwise substantially built up frontage.
- 4.34 These criteria could equally be applied for the urban areas. The default position for this Plan is that infill development will be generally supported within the urban areas. The development principles together with the supporting text to Policy EN2 provide more detailed criteria to support those in the Joint Core Strategy
- 4.35 The spatial development strategy (Table 2) sets out the settlement roles for the Plan area. The size of settlements ranges from the Growth Town of Rushden, as the largest settlement, down to the smaller rural settlements of defined villages such as Pilton and Newton Bromswold.
- 4.36 The spatial approach for the rural areas is further explained in section 4 and Policy EN1 above, with a list of the freestanding villages set out in Table 5. The smallest freestanding villages accommodate upwards of 20 dwellings and a built-up area is therefore defined by those settlements that comprises a cluster of 20 or more residential buildings and are identified in Table 5.

---

<sup>28</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12103/background\\_paper\\_2\\_-\\_settlement\\_boundaries](https://www.east-northamptonshire.gov.uk/downloads/file/12103/background_paper_2_-_settlement_boundaries)

<sup>29</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/760/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/760/planning_policy_committee)

<sup>30</sup> For Higham Ferrers, the Neighbourhood Plan (made April 2016) defines the built up area of Higham Ferrers as that part of the town bounded by the A6 and A45, and to the south by the built up area of Rushden

- 4.37 The definition of that built-up area is considered to include areas that have a closer relationship, in character and scale, to that cluster of buildings defining a settlement, than that of the surrounding countryside, as set out in the Joint Core Strategy para 5.17. This includes areas of land committed for development by way of an extant planning permission or development plan allocation adjoining the built-up area.
- 4.38 The extent of the built-up area excludes the following uses, unless they are wholly enclosed on all sides by built development forming part of the built up area:
- a) existing employment use, caravan sites, cemeteries, churchyards and leisure use including sport and recreation
  - b) freestanding built structures, including farmyards and associated agriculture buildings
  - c) open spaces and allotments
  - d) isolated properties or areas of ribbon development which are physically and visually detached from the main built form.

### **Policy EN2 Development Principles**

**Development proposals will be generally supported where they meet the following requirements/criteria:**

- (i) The site is allocated in the Local Plan or a made Neighbourhood Plan, or;**
- (ii) Infill development within a built-up area (as defined in the supporting text) or within a settlement boundary, where that is defined by a neighbourhood plan, will be supported where the site is:**
  - (a) well-related to the principal built-form of the settlement (existing or committed) and is not protected for any other use;**
  - (b) clearly distinct from the surrounding countryside, both physically and visually;**
  - (c) bounded by existing or committed development on at least two sides, which should be adjoined by a highway and such that developing it would not extend the built form away from a highway to create a “backland” form of development.**
- (iii) They would not harm the settlement’s character, form, or the surrounding countryside, including the need to avoid comprising key views, heritage assets and their settings, respect the importance of open, greenspace areas within the built up form of the settlement and seek to conserve special landscape designations; and**
- (iv) They would not be disproportionate to the settlement's size, form and range of facilities available.**



### **Freestanding villages**

- 4.39 The eight large freestanding villages (Table 4) differ significantly from other villages, in terms of their services and facilities. While predominantly rural in character, the larger villages include both urban and suburban character areas within their overall built form.
- 4.40 The other (small) villages (Table 5) tend to be more rural in character and built form than the eight large freestanding villages. However, in terms of their built form, virtually all villages incorporate transitional areas at the periphery, between the built up core and the rural hinterland (open countryside) beyond. This is recognised in the NPPF, which directs that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, but isolated homes in the countryside should be avoided (paragraphs 79-80); i.e. setting a distinction between development in or adjacent to an established settlement and the open countryside beyond.
- 4.41 Previous policy applied tightly defined settlement boundary criteria in order to protect the character of the existing built up areas and restrict small scale infill development beyond the existing built up cores of most villages. These have been reviewed to accord with the more flexible Joint Core Strategy criteria.
- 4.42 At the freestanding villages, new residential infill development should occur within the existing built up areas, as defined by Policy EN2 and the supporting text. These criteria should be applied in managing future development proposals. They may also be utilised for Neighbourhood Plans, where it has been decided to designate settlement boundaries, as is the case for the “made” Brigstock, Chelveston cum Caldecott, Glapthorn, King’s Cliffe, Stanwick and Warmington Neighbourhood Plans.

### **Development at the periphery of settlements and rural exceptions housing**

- 4.43 The NPPF (paragraph 80) emphasises a need to avoid new isolated homes in the countryside. The settlement boundaries and/or criteria for the urban areas and rural settlements enable, for the purposes of development management, a distinction to be made between the predominantly built up core area (i.e. where small scale infill and windfall development would generally be appropriate) and areas of a more dispersed, rural character at the periphery of settlements.
- 4.44 The fringe areas around settlements often contain groups of operational or redundant agricultural buildings, small groups of dwellings (less than 10 units) physically separated from the main built up area, caravan sites or other leisure uses. There is not always a clear distinction between core built up areas and the open countryside although in many locations physical features do provide a clear differentiation. Other peripheral areas may have potential to accommodate rural exceptions housing or small scale rural businesses, in accordance with Joint Core Strategy Policies 13 and 25.
- 4.45 It is recognised that several Neighbourhood Plans already define linear settlement boundaries. It would not fulfil the spirit of the NPPF if settlement boundaries are regarded as equivalent in status to the Green Belt, beyond which there is general presumption against most new build development. Rather, they are a development management tool, to provide a distinction between the core built up area and more sensitive peripheral and gateway parts of a settlement. Policy EN3 (below) sets out how

development proposals beyond a defined settlement boundary (where this exists) should be assessed.

- 4.46 Policy EN3 enables a differentiation between built up areas and the countryside beyond to be clearly made. In particular, this has implications for the delivery of rural exceptions housing schemes. National policy includes explicit provision to bring forward rural exceptions sites where these provide affordable housing to meet identified local needs (NPPF paragraph 78).
- 4.47 The Joint Core Strategy (Policy 13) provides an overarching rural exceptions housing policy, setting a strategic perspective on such development, which attempts to apply a policy that addresses all settlements across North Northamptonshire from large to small. East Northamptonshire is however, particularly rural in nature. The intention of the strategic policy is to meet local need where appropriate, recognising that the involvement of local communities is an essential prerequisite for the consideration of schemes to meet local housing need.
- 4.48 Strictly applied, Policy 13 of the Joint Core Strategy could exclude the potential for rural exception housing across the majority of settlements within the East Northamptonshire area, although it does recognise that there may be special circumstances when development is acceptable in the rural area, particularly where proposals meet identified need for affordable housing provision which is also supported locally. To explain how Policy 13 applies at a local level, Policy EN3 provides additional guidance for supporting proposals for rural exception housing schemes within the district.

### **Policy EN3: Development on the periphery of settlements**

**Beyond the extent of the built up area, as defined in the supporting text to Policy EN2 (or defined by a settlement boundary, within a made Neighbourhood Plan), new build residential development will not generally be supported. Proposals for rural diversification, the re-use or conversion of rural buildings, or rural exceptions housing schemes, will be supported.**

**In recognition of the rural nature of the district the following criteria will apply when assessing the suitability of settlements to provide for Rural Exceptions Housing on the periphery of settlements:**

- a) The proposed development would assist in supporting services in the settlement or in a cluster of nearby settlements,**
- b) Proposals will need to take into account the policy requirements set out in Policy 13 of the Joint Core Strategy, balanced against the need to assist in meeting a locally identified need for affordable housing provision and a desire for people to continue to live in their local community evidenced by a local needs housing survey.**

### **Replacement dwellings in the open countryside**

- 4.49 National policy seeks to limit the development of isolated new build dwellings in the countryside; it does however set out circumstances where such proposals may be acceptable. The replacement dwellings policy is intended to ensure that the new build dwelling is of a scale and form appropriate to its setting. It is important to ensure that replacement dwellings maintain, respect and/ or enhance their rural setting. Policy EN4 sets out the criteria against which provisions for replacement dwellings will be considered.

#### **Policy EN4: Replacement dwellings in the open countryside**

**Proposals for new build replacement dwellings in the countryside will be granted where they meet the following criteria:**

- a) The original dwelling has not been abandoned or allowed to fall into a state of dereliction and disrepair, so that any replacement would in effect be treated as a 'new dwelling' (a structural survey will be required where any signs of dereliction or disrepair is visible or the building has been unoccupied for some time);**
- b) The original dwelling is not a temporary or mobile structure;**
- c) The replacement dwelling is located within the site boundary of the original dwelling;**
- d) The replacement is of a size, scale and massing similar to the original dwelling, and the footprint and floor space should be a similar amount to the original dwelling;**
- e) Where an existing dwelling is considered too small for modern living standards,(to be assessed having regard the latest applicable national space standards) the floor space may be increased, to meet nationally described space standards, however this should not be to the detriment of the open countryside or character of the area; and**
- f) The design, materials and layout of the replacement dwelling should be sympathetic to the surrounding area by preserving and/ or enhancing the immediate setting and taking into account any wider impact of the development in its general location.**

**Conditions or unilateral undertakings will be used to ensure the demolition and removal of the existing dwelling is undertaken prior to the first occupation of the new dwelling or prior to construction of the new dwelling where more appropriate.**



## 5.0 Natural Capital

- 5.1 Natural capital is defined as the world's stocks of natural assets which include geology, soil, air, water and all living things. It is from this natural capital that humans derive a wide range of benefits (or services), often called ecosystem services, which make human life possible.
- 5.2 The importance of natural capital is recognised in Policy 1 of the Joint Core Strategy. This states that development should deliver improvements to “*the economic, social and environmental conditions in the area meeting the challenges of climate change and protecting and enhancing the provision of ecosystem services*”. In other words, to fulfil the presumption in favour of sustainable development, new development should ideally secure net environmental enhancement (i.e. overall gains in natural capital).
- 5.3 At a district level, natural capital as a concept normally relates to local areas, features or sites of biodiversity importance. Such green and/ or blue infrastructure is recognised in the Joint Core Strategy as being vital in maintaining the rural/ urban character of the Plan area (North Northamptonshire).
- 5.4 The Joint Core Strategy includes an extensive range of policies relating to the protection of existing assets; the natural and historic environment. Furthermore, it includes policies for delivering natural capital gains, through the Green Infrastructure framework. The Plan considers where further site specific policies will be required to deliver the benefits of development. All sites should meet the criteria outlined in the North Northamptonshire Joint Core Strategy Policy 5 (Water Environment, Resources and Flood Risk Management) and Policy 10 (Provision of Infrastructure).

### Green Infrastructure

- 5.5 The NPPF describes Green Infrastructure as “*a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities*”. The Joint Core Strategy, although it predates the revised NPPF, also provides clear direction as to the role and function of GI to “*enhance and respect local character and enhance biodiversity*” (Outcome 3). This seeks effective delivery through “*an integrated approach to biodiversity and a net gain in Green Infrastructure, strengthening links between the countryside and the towns*”.
- 5.6 In 2014, Natural England produced a nationwide profile of National Character Areas (NCAs)<sup>31</sup>. These NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help deliver the maximum benefits for the natural environment. Biodiversity Action Plan (BAP) Habitats and Species data is also a relevant consideration. This is available elsewhere via organisations such as Natural England and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire and so is not identified on the Policies Map. East Northamptonshire is covered by the following NCAs:
- 88 – *Bedfordshire and Cambridgeshire Claylands* – eastern periphery of the District; e.g. Ashton, Clopton, Hemington, Luddington, Luton, Thurning;

---

<sup>31</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

- 89 – *Northamptonshire Vales* – Nene Valley;
- 91 – *Yardley Whittlewood Ridge* – south eastern periphery of the District; e.g. Chelston Rise (Chelveston), Hargrave, Newton Bromswold, Avenue Road/ Newton Road area of Rushden;
- 92 – *Rockingham Forest* – Majority of the rural parts of the District, north of the A14.

5.7 Policies 19-21 of the Joint Core Strategy explain how GI should be delivered at the strategic level. These policies relate to the GI network across North Northamptonshire, and East Northamptonshire in particular:

- Sub-regional GI corridors e.g. Willow Brook, Harper’s Brook (Joint Core Strategy Figure 17/ Policy 19(b));
- Local GI corridors (Joint Core Strategy Figure 17/ Policy 19(c));
- Nene Valley (Policy 20); and
- Rockingham Forest (Policy 21).

5.8 Whilst specific GI routes are identified within the Joint Core Strategy (Figure 17), it is recognised that there is scope to identify local site specific proposals or linear connections in this Plan.

5.9 A spatial analysis of the GI resources in East Northamptonshire has been undertaken to identify the distribution of local GI corridors and assets within the district. The study revealed that the areas of the multi-functionality are predominantly located to the west of the River Nene (mainly within Rockingham Forest), with fewer opportunities located to the east of the river. Furthermore, several new GI corridors have been recommended based on the distribution of existing multifunctional GI assets. Much of the GI network has already been established in the south of the district, so more attention is now required to deliver an improved GI network in the north of the district.

5.10 As a result of the study, a local GI network comprised of existing and planned assets is proposed, to accord with the Joint Core Strategy and current Planning Practice Guidance. This study identifies priority local GI corridors (i.e. those which offer the greatest net benefit in terms of ecosystem services). GI can deliver a broad range of positive gains, including biodiversity conservation, water and flood management, and social (health and wellbeing). It is important to ensure that these wider GI benefits, continues to be delivered and enhanced.

5.11 There are a number of projects contained in made and emerging Neighbourhood Plans related to the regeneration and strengthening of the local GI, e.g. the made Barrowden and Wakerley and Brigstock Neighbourhood Plans, which relate to the Welland Valley and Harper’s Brook corridors respectively. Proposals for a strategic approach for GI provision around the periphery of Oundle, to create a circular cycle/ pedestrian network, are set out in the Oundle Cycle Network Study (June 2015<sup>32</sup>), which this Plan will support.

5.12 Where appropriate in terms of the scale of the development and its proximity to the GI network, developer contributions will be sought towards the protection and enhancement of the GI corridors within the district, including the Greenway. As this requirement may

---

<sup>32</sup> <https://www.oundle.gov.uk/uploads/oundle-cycle-network-study---sustrans---draft-2.pdf>

affect the viability of smaller developments a threshold of 10 or more dwellings; 0.5 ha or more for housing schemes; or more than 1000m<sup>2</sup> for commercial schemes, is set (Policy EN5, below) to enable developer contributions towards the local GI and Greenway. It is important to engage with key stakeholders at an early stage.

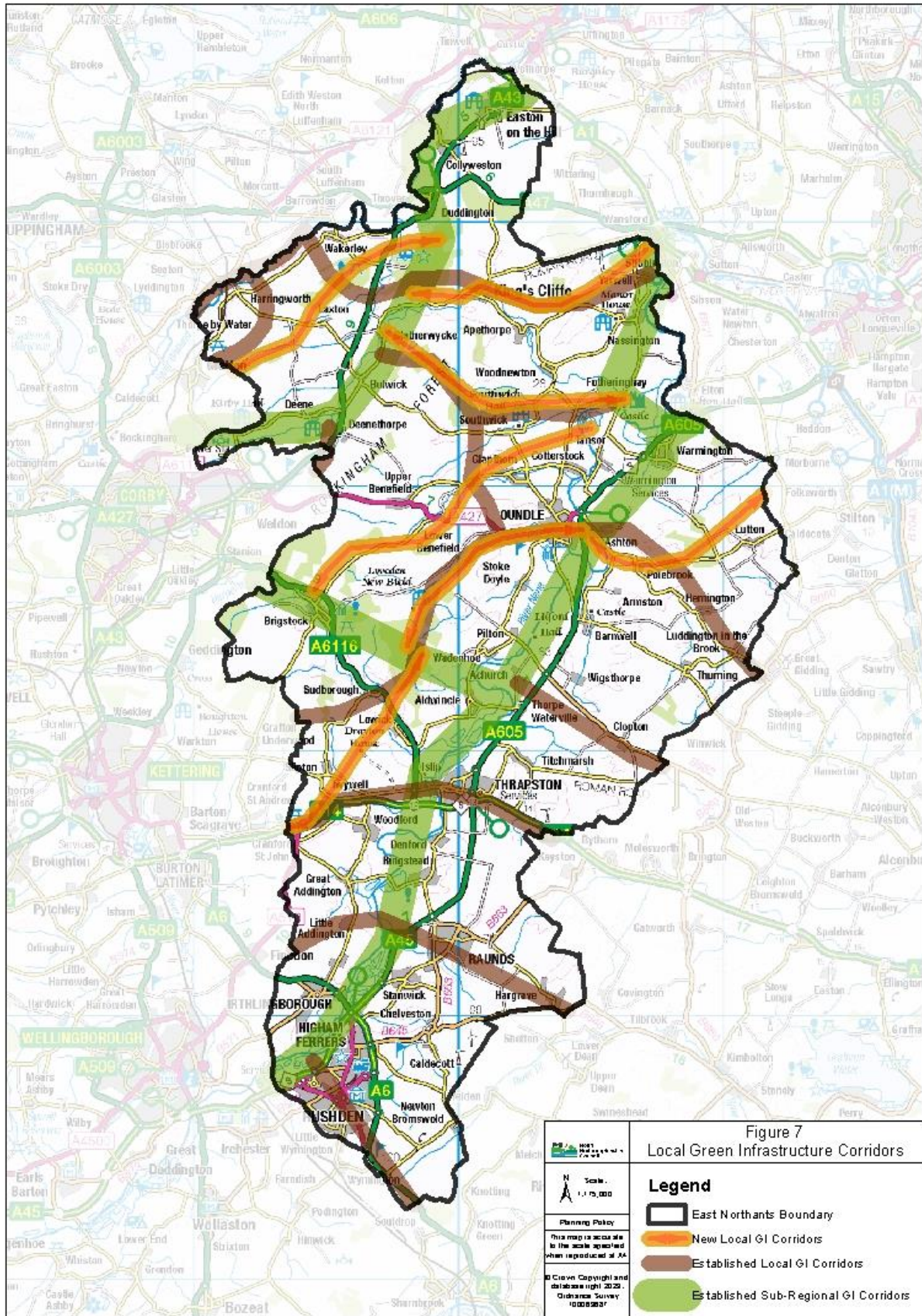
- 5.13 There are many ways that development can link in with the existing GI network. In addition to the GI corridors shown on the Policies Map there are maps available which identify the wider GI network in a location, for example the GI standards suite prepared by Natural England has a mapping tool where all GI can be seen. Developments should consider early in the design process where the local GI is located and how the development can link to it, both for people and wildlife benefit. There are various policies and guidance available on how good design can facilitate this.
- 5.14 When determining contributions towards GI, consideration needs to be given to the relationship between Policy EN5 and EN6. Contributions should reflect the scale and location of the site under consideration and should be proportionate. The relationship with Policy EN5, EN6 and EN8 also needs to be considered. GI and Open Space are clearly related with open spaces forming an integral part of the GI network. Opportunities to combine open space and green infrastructure schemes should be sought to optimise design and keep contributions proportionate. The Council will take care to avoid double counting between strategic and local green infrastructure and open space requirements when calculating contributions. A Supplementary Planning Document for Open Space and GI provision will be prepared to set out a step by step guide for calculating requirements.
- 5.15 The NPPF (paragraph 180) recognises the importance of ancient woodlands and veteran trees as a key element of maintaining the natural capital of the district. This is acknowledged through this Plan (Policy EN5, below). Trees, and the landscape they form part of, are key to the character of an area and significantly contribute to the environment. Best practice guidance for the protection of existing and the planting of new trees is provided through the Trees and Landscape Supplementary Planning Document, adopted June 2013<sup>33</sup>.

---

<sup>33</sup> [https://www.east-northamptonshire.gov.uk/site/scripts/download\\_info.php?downloadID=1755&fileID=5019](https://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=1755&fileID=5019)



**Figure 7: Priority Green Infrastructure Corridors**



- 5.16** Policy EN5 ensures that the GI corridors across the district are protected and enhanced. It provides additional direction to support the delivery of GI as stipulated in Figure 17 and Policy 19 of the Joint Core Strategy. It is recognised that the delivery of enhancements to the priority GI corridors presents particular challenges; e.g. establishing connections across strategic roads or other physical barriers. In order to secure the long term management and maintenance of new public open spaces or other Green Infrastructure developers should work with the council to determine the most appropriate long term management and maintenance arrangements.

### **Policy EN5: Local Green Infrastructure corridors**

**Local Green Infrastructure corridors are identified on the Policies Map and Figure 7. These local corridors will be protected and enhanced through development proposals.**

**Development proposals will be expected to:**

- a) Ensure that, where opportunities exist, new development, including open space, is connected to the Local Green Infrastructure network, this includes the local GI corridors and the wider Green Infrastructure network;**
- b) Ensure, through the design and layout of schemes, the delivery of ecosystem services, through measures such as green roofs and walls, the protection of soils, plus new tree planting, including planting of new street trees, using native species;**
- c) Using developer contributions, and additional funding streams, where possible, to facilitate appropriate additions to, or improve the quality of, the existing and proposed Green Infrastructure network; and**
- d) Requiring sites of 10 dwellings or more (or 0.5ha or more) and commercial sites of 1000m<sup>2</sup> or more to make on-site provision and/ or provide off-site contributions, to create connections to the defined Green Infrastructure corridors in accordance with the most up to date standards/ standards in the SPD.**

**Opportunities to create the following local Green Infrastructure corridors and incorporate them into the wider Green Infrastructure network will be supported:**

- i) Duddington – Gretton (via Wakerley Woods)**
- ii) King’s Cliffe – Wansford**
- iii) Blatherwycke – Fotheringhay**
- iv) Brigstock – Fotheringhay (via Glapthorn Cow Pasture and Lower Benefield)**
- v) Brigstock Country Park – Oundle**
- vi) Oundle – Great Gidding (via Ashton Wold)**
- vii) Aldwincle – Twywell (via Drayton House)**
- viii) Oundle circular cycle/ pedestrian network**

## The Greenway

- 5.17 The Greenway is a central GI route that will, upon completion, run from Wellingborough railway station through East Northamptonshire, to Peterborough railway station. It will provide an alternative means of transport, predominantly for walkers cyclists and equestrian users where appropriate, and to provide opportunities for informal recreation. The Greenway is being developed in phases, some of which have been completed. Detailed proposals for future phases of the Greenway are set out in the Greenway Forward Plan 2019 to 2024<sup>34</sup>, particularly proposals to the north of Thrapston. Additionally, the 2015 Oundle Cycle Network Study puts forward specific proposals in/ around the Oundle Urban Area, which could be integrated with the Greenway proposals, to deliver a fully integrated network for the Nene Valley between Wellingborough and Peterborough. This Plan will recognise the importance of the Greenway project and the implication for development proposals throughout the district.
- 5.18 In terms of project specific delivery of the Plan's GI priorities, the Greenway should be regarded as the "jewel in the crown". Much of this long term GI project has already been delivered in the south of the district, with links between Rushden, Higham Ferrers, Irthlingborough, Stanwick, Raunds, Ringstead and Woodford. Previous Local Plans have sought to define linear routes on the Policies Map to denote proposals to extend the Greenway or other GI corridors. This has proven to be overly rigid and inflexible, so this Plan will look to define conceptual corridors (in a similar way to Figure 17 of the Joint Core Strategy) in place of proposed linear routes. The aim is that these can be delivered as separate projects or as part of other developments. The Greenway Vision identifies the following principal elements:
- Predominantly off-road connections between Wellingborough, Irthlingborough, Rushden, Higham Ferrers, Stanwick, Raunds, Ringstead, Woodford and Thrapston, Great Addington, Little Addington, Denford;
  - On and off-road routes, connecting Thrapston to Oundle;
  - On and off-road cycle network within and around the Oundle urban area, providing connectivity between the Thrapston (south) and Peterborough (north/ east) routes;
  - Connections to Peterborough 'Green Wheel' – on/ off road links between Oundle and Peterborough, including routes via Tansor and Warmington;
  - Indicative connection from Weldon, Deene, Deenethorpe and surrounding villages to Tresham Garden Village and on to Oundle;
  - Aspirational east-west off-road connection utilising the former Rugby – Market Harborough – Peterborough railway line.
- 5.19 The made Neighbourhood Plans for Barrowden and Wakerley, Chelveston cum Caldecott, Higham Ferrers, Raunds, Ringstead and Warmington; all include specific proposals for possible extensions and links to the Greenway, shown in Figure 8 (below).
- 5.20 Contributions towards The Greenway will need to be considered alongside the requirements of Policy EN5 and EN8 to ensure that requirements are proportionate and

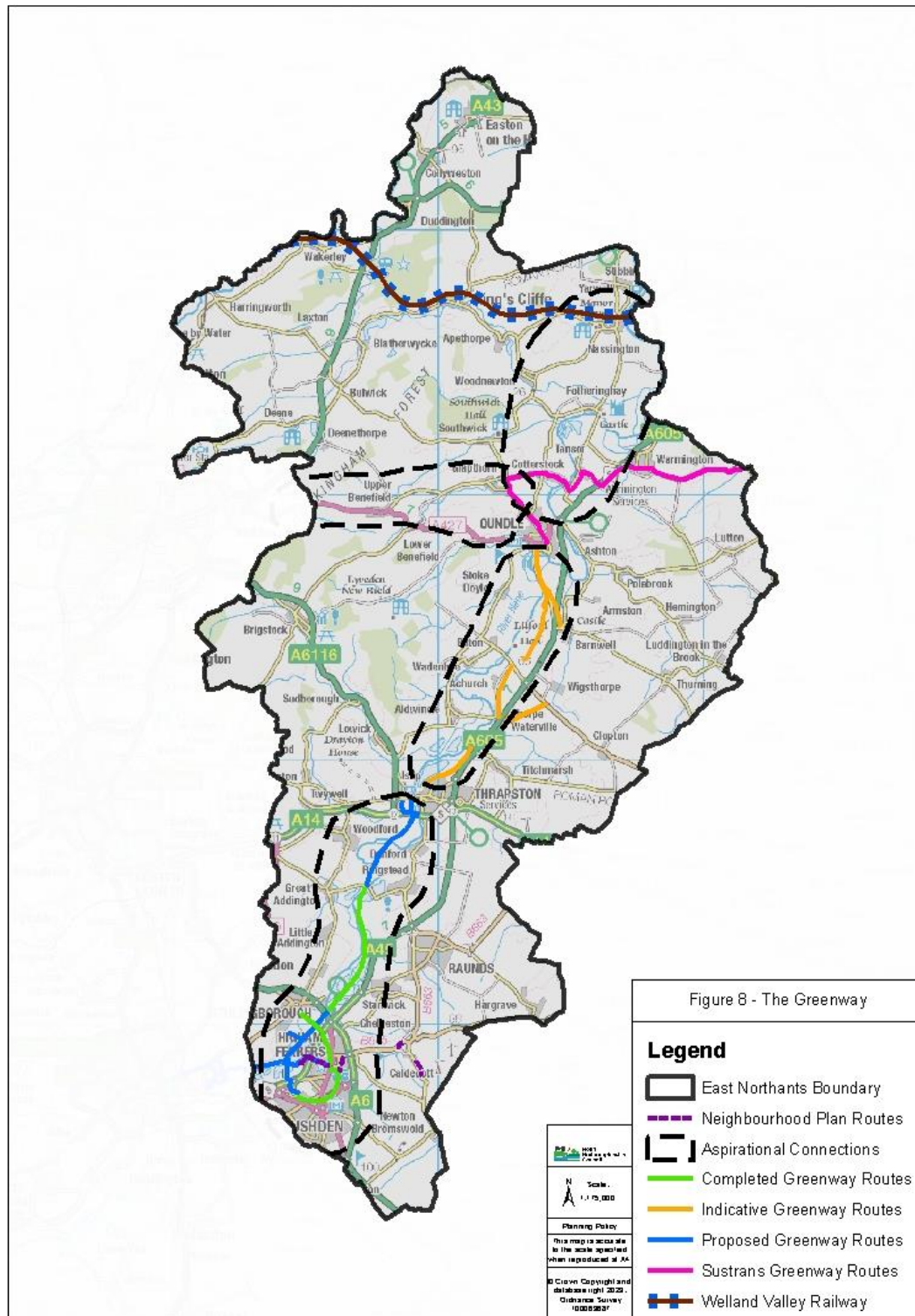
---

<sup>34</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/7666/the\\_greenway\\_forward\\_plan\\_2018-22](https://www.east-northamptonshire.gov.uk/downloads/file/7666/the_greenway_forward_plan_2018-22)



take into account the scale and location of the development, and that no double counting of contributions is requested. Contributions towards the Greenway will be sought from development located in settlements where there is access to The Greenway or where there are opportunities to create or enhance connections to The Greenway. A Supplementary Planning Document for Open Space and GI provision will be prepared to set out a step by step guide for calculating requirements.

**Figure 8: The Greenway**



## **Policy EN6: The Greenway**

The Greenway routes, both existing and proposed, as identified on the Policies Map and Figure 8 comprise a priority Green Infrastructure project for the Council, requiring both investment and improvement to ensure its satisfactory delivery. This includes the aspirational connections, where opportunities will be explored within the areas delineated by the dashed lines on the Policies Map and Figure 8.

**Development should:**

- a. be designed to protect and enhance the Greenway, and to strengthen connections to the wider green infrastructure network within the District;
- b. protect and enhance heritage assets and their settings; and
- c. on residential developments of 10 or more dwellings (or sites more than 0.5ha) and commercial sites of 1000m<sup>2</sup> or more which are located in settlements with access to The Greenway, or where there are opportunities to connect to The Greenway, contributions toward enhancement of The Greenway will be required in accordance with the most up to date standards set out in the SPD. Opportunities for the creation/ enhancement of connections to The Greenway will be required in line with Policy EN5.

The aim will be to provide fully integrated connections along the Nene Valley; linking Wellingborough, Peterborough and the Rockingham Forest. This will be achieved via development or through mechanisms such as developer contributions and additional funding streams where appropriate.

Future maintenance of the Greenway and especially the area that adjoins it should be secured. Developers should work with the Council to determine the most appropriate future maintenance arrangements.

### **Local Green Space**

- 5.21 Local Green Space (LGS) is designated as a national land use in the NPPF (paragraphs 101-103). In practice, the NPPF enables the designation of LGS through the Local Plan Part 2 and/ or Neighbourhood Plans. Designating land as LGS provides a level of protection against development in green areas that are of particular importance for local communities.
- 5.22 The designation of LGS may provide an opportunity to deliver enhanced protection for established biodiversity sites without statutory protection. For example, non-statutory local wildlife or local geological sites (also sometimes shortened to LGS) could be protected, where appropriate, as LGS.
- 5.23 The NPPF sets out specific criteria that would need to be met for land to be designated as LGS (paragraph 102). The LGS designation should only be used where the green space is:



- in reasonably close proximity to the community it serves;
- special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- local in scale/ character and is not an extensive tract of land.

5.24 With reference to the third requirement, the NPPF does not define the threshold for what an ‘extensive’ tract of land is, although the intention is to ensure that the designation of LGS cannot be applied to indirectly introduce a new Green Belt. It is therefore for this Plan to establish what this means at a district level, through setting an enhanced local standard to explain how the terms “local in character” and “extensive tract of land” are to be applied, in cases where LGS designations are sought. These matters are assessed in the Local Green Space Background Paper (BP3)<sup>35</sup>.

5.25 Given that the designation of LGS is a specifically local and non-strategic matter, it is considered that Neighbourhood Plans represent the most appropriate mechanism for designating individual sites. Indeed, several “made” Neighbourhood Plans have already designated LGS sites, and these are already shown on the adopted policies map. As such, this Plan will not seek to designate individual LGS sites but will define an enhanced local interpretation of the NPPF criteria, as set out in Policy EN7 (below). In addition, increasing weight will be given to LGS sites designated in emerging Neighbourhood Plans, as they progress.

5.26 Local Green Space is also relevant to wider tourism, leisure and recreational activities and associated employment. As an example, Oundle is short of ‘in town’ greenspace but is characterised by access along the River Nene and Barnwell Country Park. This wider linkage is a critical element of the quality of life and the attraction of Oundle as a visitor or tourist destination. Improved ‘in town’ green infrastructure should enable enhanced access to these wider facilities.

### **Policy EN7: Designation of Local Green Space**

**In accordance with the National Planning Policy Framework guidance, Local Green Space may be designated through Neighbourhood Plans, where it has been identified by the community and it fulfils the following criteria:**

- a) The site is closely related to the main built up area of the settlement it is intended to serve;**
- b) Where local value can be demonstrated, in terms of providing one or more of the following functions:**
  - i) Defining the setting of a built up area**
  - ii) Archaeological or historical interest, including tourism related activities**

<sup>35</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12104/background\\_paper\\_3\\_-\\_local\\_green\\_spaces](https://www.east-northamptonshire.gov.uk/downloads/file/12104/background_paper_3_-_local_green_spaces)

iii) Recreational importance

iv) Tranquillity, or

v) biodiversity;

vi) beauty; and

c) The gross area of the site should be proportionate to the existing main built up area of the settlement and not an extensive tract of land.

### Protection and enhancement of open space, sport and recreation

- 5.27 At a local level, public open spaces, sports pitches and recreation grounds all provide a valuable resource, linking natural capital and people. This enables people to access and benefit from GI, be it within new developments, linear corridors or country parks. This multi-functional role provides a good example of how ecosystem services function in practice.
- 5.28 The Joint Core Strategy includes a generic policy for the retention and enhancement of public open space, allotments, sports and recreation buildings and land (playing fields), identifying their role as a key community facility (Policy 7(d)). In 2015 the Council appointed Knight Kavanagh and Page (KKP) to prepare an Open Space Study and Playing Pitch Strategy (April 2017)<sup>36</sup>. This updated the earlier (2006) Open Space, Sport and Recreation Study, which informed the previous Local Plan and 2011 Open Space SPD. The latter contains detailed standards regarding development contributions for open space, sport and recreational facilities, which will be replaced by the standards in this Plan (Tables 6-8, below; derived from the KKP study, or any subsequent updates).
- 5.29 Evidence gathering for the 2017 KKP study was undertaken during 2015/2016 to provide a comprehensive analysis of open space and playing pitch provision in the district. The KKP study provides evidence for locally based policies and standards for each open space typology, to ensure open space requirements will be implemented for all new development, either by enhancing existing lower quality open space or by providing new open space to meet the additional need. Further information about how the KKP has informed this section of the Plan are set out in the Open Spaces and Green Infrastructure Background Paper (BP4)<sup>37</sup>.

### Open space

- 5.30 The KKP Open Space Assessment Report assesses the quality and value of existing open spaces, shown in Table 6 (below).

**Table 6: Open Space Assessment – Quality and Value Criteria**

**Quality Criteria**

**Value Criteria**

<sup>36</sup> [https://www.east-northamptonshire.gov.uk/downloads/download/4484/open\\_space\\_and\\_playing\\_pitch\\_strategy](https://www.east-northamptonshire.gov.uk/downloads/download/4484/open_space_and_playing_pitch_strategy)

<sup>37</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12105/background\\_paper\\_4\\_-\\_open\\_spaces](https://www.east-northamptonshire.gov.uk/downloads/file/12105/background_paper_4_-_open_spaces)

| <b>Quality Criteria</b>   | <b>Value Criteria</b>  |
|---|--|
| <ul style="list-style-type: none"> <li>• Physical access</li> </ul>                         | <ul style="list-style-type: none"> <li>• Level of use</li> </ul>                                     |
| <ul style="list-style-type: none"> <li>• Personal security</li> </ul>                       | <ul style="list-style-type: none"> <li>• Structural and landscape benefits</li> </ul>                |
| <ul style="list-style-type: none"> <li>• Social access</li> </ul>                           | <ul style="list-style-type: none"> <li>• Ecological benefits</li> </ul>                              |
| <ul style="list-style-type: none"> <li>• Parking</li> </ul>                                 | <ul style="list-style-type: none"> <li>• Educational benefits</li> </ul>                             |
| <ul style="list-style-type: none"> <li>• Information signage</li> </ul>                     | <ul style="list-style-type: none"> <li>• Social inclusion and health benefits</li> </ul>             |
| <ul style="list-style-type: none"> <li>• Equipment and facilities</li> </ul>                | <ul style="list-style-type: none"> <li>• Cultural and heritage benefits</li> </ul>                   |
| <ul style="list-style-type: none"> <li>• Location value</li> </ul>                          | <ul style="list-style-type: none"> <li>• Amenity benefits and sense of place</li> </ul>              |
| <ul style="list-style-type: none"> <li>• Site problems</li> </ul>                           | <ul style="list-style-type: none"> <li>• Economic benefits</li> </ul>                                |
| <ul style="list-style-type: none"> <li>• Groups that the site meets the needs of</li> </ul> | <ul style="list-style-type: none"> <li>• Context of site in relation to other open spaces</li> </ul> |
| <ul style="list-style-type: none"> <li>• Maintenance and cleanliness</li> </ul>             | <ul style="list-style-type: none"> <li>• Designated site (e.g. LNR, SSSI)</li> </ul>                 |
| <ul style="list-style-type: none"> <li>• Healthy, safe and secure</li> </ul>                | <ul style="list-style-type: none"> <li>• Educational programme in place</li> </ul>                   |
| <ul style="list-style-type: none"> <li>• Site potential</li> </ul>                          | <ul style="list-style-type: none"> <li>• Historic site</li> </ul>                                    |
|   | <ul style="list-style-type: none"> <li>• Listed building or historical monument on site</li> </ul>   |
|   | <ul style="list-style-type: none"> <li>• Registered 'friends of' group to the site</li> </ul>        |

5.31 The following standards are proposed in the KKP Open Space Standards Paper for each open space typology. No standard is set for cemeteries or civic spaces due to their unique nature and usage. These standards will be applied to all new development in the Plan area. The accessibility standards in Table 7 (below) apply to the whole of the district.

| <b>Typology</b>             | <b>Accessibility</b>              |
|-----------------------------|-----------------------------------|
| Parks and gardens           | 1200 metres (15 minute walk time) |
| Natural and semi-natural    | 1200 metres (15 minute walk time) |
| Amenity greenspace          | 400 metres (5 minute walk time)   |
| Children and younger people | 800 metres (10 minute walk time)  |
| Allotments                  | 1200 metres (15 minute walk time) |

5.32 In terms of quantity of open space provision, there are current and future standards set out for each area of East Northamptonshire (Higham Ferrers, Irthlingborough, Oundle, Raunds, Rushden, Thrapston and Rural). Table 8 (below) identifies what minimum level of requirement for each typology would be needed to support appropriate new development proposals.

| Typology                    | Higham Ferrers  | Irthling-borough | Oundle | Raunds <sup>38</sup> | Rushden            | Thrapston | Rural |
|-----------------------------|---|------------------|--------|----------------------|--------------------|-----------|-------|
|                             | (ha per 1000 population/ 417 households <sup>39</sup> ) |                  |        |                      |                    |           |       |
| Parks and gardens           | 0.25  | 0.01             | 0.31   | 0.58*                | 1.12               | 0.15      | 1.85  |
| Natural and semi-natural    | 1.28  | 14.98            | 1.63   | 2.87                 | 1.38               | 1.04      | 9.33  |
| Amenity greenspace          | 0.39  | 1.16             | 0.36   | 0.56                 | 0.58               | 0.64      | 0.94  |
| Children and younger people | 0.05  | 0.03             | 0.09   | 0.03                 | 0.04 <sup>40</sup> | 0.09      | 0.14  |
| Allotments                  | 0.09  | 0.38             | 0.12   | 0.16                 | 0.38               | 0.34      | 0.79  |

- 5.33 New housing developments create additional need with regard to open space, however the viability of small housing schemes may be affected. Therefore, a threshold of 10 or more dwellings or 0.5 ha or more for housing schemes will be established for the requirement of developer contributions towards the provision and enhancement of open space which is suitable for children and younger people as well as older people. The preference is for provision to be made onsite, however where sites are physically constrained, if necessary to achieve development viability, it may be appropriate to seek development contributions towards off-site provision where this can be justified.
- 5.34 The open space for the Sustainable Urban Extension of Rushden East will be dealt with as a separate matter and the precise detail of what is to be provided there will be informed by the Open Space and Playing Pitch Strategy (or subsequent updates), future iterations of the MFD/SPD for the site and negotiations through the planning application process.
- 5.35 Open space requirements will be calculated using the most up to date evidence on open space. An Open Space SPD will be prepared which will provide a step by step guide for calculating open space requirements. Contributions toward open space would be spent in accordance with the Open Space Study and Local Infrastructure Plan.
- 5.36 There is a clear relationship between open space and the green infrastructure network. Open spaces form an integral component of the green infrastructure network. To ensure a commensurate approach when determining contributions, the requirements of EN5 and EN6 should be taken into account. Opportunities to combine open space and green infrastructure schemes should be sought to optimise design and keep contributions proportionate. The Council will take care to avoid double counting between strategic and local green infrastructure and open space requirements when calculating contributions.

<sup>38</sup> Raunds was identified as having no existing parks and gardens provision therefore the wider East Northamptonshire figure has been used.

<sup>39</sup> Applying 2.4 persons per household standard

<sup>40</sup> The figure of 0.04 ha per 1000 population is a minimum

## **Policy EN8: Enhancement and provision of open space**

**All new residential development of 10 or more dwellings (or sites more than 0.5 ha) will be required to contribute to the enhancement and provision of open space to meet the needs of the population arising from the development.**

**The provision of new open space will be required for development where there is an identified quantitative and/ or qualitative need. Requirements will be determined in accordance with the most up-to-date evidence base. Where applicable, new open space will need to be provided in order to meet the following requirements (or subsequent updates to these requirements set out in the most up-to-date evidence base):**

- **Quality and value criteria in Table 6;**
- **Accessibility standards in Table 7; and**
- **Quantity standards in Table 8.**

**Rushden East SUE will have its own bespoke open space, sport and recreation facilities which will be agreed in accordance with Policy EN29, informed by the Open Space and Playing Pitch Strategy (or subsequent updates).**

**For all other qualifying development, contributions to enhance the quality and value of existing open space onsite, or where appropriate offsite, including enhanced connectivity between open spaces and the Green Infrastructure network within the locality, will be required. Developer contributions will be calculated based on the quantity standards for the scale of development proposed.**

**The long term management and maintenance of all new open space must be secured. Developers should work with the Council to determine the most appropriate long term management and maintenance arrangements.**

### **Sport and Recreation**

- 5.37 The KKP Playing Pitch Strategy Assessment Report provides an evaluation of the local supply of and demand for playing pitch facilities in the district. The quantity, accessibility and quality of each of the following types of facility have been assessed: football pitches (both grass and artificial), rugby pitches, hockey pitches (artificial), cricket pitches, tennis courts and bowling greens.
- 5.38 In the KKP Playing Pitch Strategy and Action Plan, the district is divided into two analysis areas, north and south, to allow for a more localised assessment. Oundle and Thrapston are located in the north of the district, whilst Higham Ferrers, Irthlingborough, Raunds and Rushden are located in the south. The shortfalls in the study are expressed in match sessions rather than in number of pitches required. To convert match sessions into a number of pitches, the number of match sessions is halved (to take account of teams playing on a home and away basis). This has been done to calculate the total demand, combining current demand and future demand.

- 5.39 For all types of facilities either current demand is being met or there is an identified shortfall. Some facilities also have a predicted future shortfall as a result of the exacerbation of the current shortfall. The study concludes there is a need to protect and improve the existing provision, as well as to create new playing pitches.
- 5.40 The Plan focuses upon maximising opportunities for people to be physically active, as reflected in the Northamptonshire Physical Activity and Sport Framework (NPASF) 2018-2031. These opportunities should be maximised through encouraging active lifestyles, beyond a focus upon protecting traditional sports based facilities such as playing pitches, for competitive sports. This can include green gyms, marked/ measured trails and activities trails.
- 5.41 New developments create additional need for sport and recreation facilities, therefore major residential developments and strategic employment developments will be required to provide developer contributions towards the provision and enhancement of sport and recreation facilities or make provision for these on site.
- 5.42 A Sports and Recreation SPD will be prepared to set out the process for determining contributions. This will set out a step by step process for calculating requirements using Sport England planning tools to inform decision making. The focus for investment of contributions will be the Playing Pitch Strategy (or subsequent update), and where appropriate, other relevant documents, including Sports Facilities Strategies, Physical Activity and Sports Frameworks, Health and Wellbeing Strategies, Neighbourhood Plans and/ or plans or strategies prepared by National Governing bodies for sport and physical activity.

#### **Policy EN9: Enhancement and provision of sport and recreation facilities**

**All new residential development of 10 or more dwellings (or sites more than 0.5ha) and employment development of 5ha or more will be required to enhance the quality and value of existing sports and recreation facilities within the locality and/ or create new facilities to meet needs arising from the development. Developer contributions will be calculated based on the most up-to-date evidence base.**

**Preference will be to meet need through new onsite provision, though off-site provision and enhancement of existing facilities will be considered, where a need for such an approach can be fully justified.**

**Rushden East SUE will have its own bespoke sport and recreation facilities which will be agreed in accordance with Policy EN29, informed by the Open Space and Playing Pitch Strategy (or subsequent updates).**

**The long term management and maintenance of all new sport and recreation facilities—must be secured. Developers should work with the Council to determine the most appropriate long term management and maintenance arrangements.**

## 6.0 Social Capital

6.1 Social capital is about how people (communities) coexist, function and live together. It is defined as “*the networks of relationships among people who live and work in a particular society, enabling that society to function effectively*”. Typically, the concept of social capital is closely related to quality of life considerations.

6.2 There are many ways that the Plan can deliver social capital enhancements or gains i.e. quality of life improvements. The Joint Core Strategy includes a policy framework to deliver the following outcomes:

- Empowered and proactive communities;
- Enhanced local character;
- Excellent services and facilities;
- A more diverse economy;
- More walkable places and an excellent choice of ways to travel;
- Stronger, more self-reliant towns; and
- Enhanced quality of life for all residents.

6.3 There are many aspects to social capital. Elements of this concept include the protection, retention or enhancement of community assets. For this, the Joint Core Strategy sets out a comprehensive overarching policy to support and enhance community services and facilities (Policy 7).

6.4 The six urban areas all host a range of services and facilities typical to market towns of their respective sizes. In rural areas, development should be supported where this is necessary and appropriately located to boost local services and a prosperous rural economy. In particular this should be the focus of development within the larger villages (Table 5; section 4.0, above), all of which, to some degree, function as service hubs for the wider area.

6.5 However, the concept of social capital underpins all elements of quality of life, much of which is greatly influenced by the built environment. The Joint Core Strategy sets out a range of policies for protecting assets, including the historic environment, landscape, biodiversity, geodiversity, water environment, place shaping and sustainable building standards. These policies provide the overall framework for managing development.

6.6 The initial consultation for the Plan (Regulation 18 consultation) and subsequent stakeholder engagement has revealed that there are a number of themes where this Plan could provide additional direction, over and above the Joint Core Strategy. Policies within this section of the Plan will address the following matters:

- Health and wellbeing;
- Design and character;
- Historic environment;
- Tourism and culture; and
- Education and training.

## Health and wellbeing

- 6.7 Health and wellbeing are key aspects of social capital and are reflected as overall quality of life functions. This Plan provides additional district level policy direction to support the place shaping principles of the Joint Core Strategy (Policy 8).
- 6.8 Although faring better than average in some regards, East Northamptonshire, like all parts of the country faces a number of significant health and wellbeing challenges within its communities. In order to address these, local councils and their health partners are working with their communities to support and improve health and wellbeing. Important issues include:
- Increasing levels of physical activity – approximately one quarter of adults<sup>41</sup> are not physically active enough to maintain good health.
  - Healthy diet and weight - Two-thirds of adults in East Northamptonshire are overweight or obese, which has significant implications for their health and wellbeing.
  - In school year 6 (final year of primary education), 17.2% of children are obese.
  - Social isolation – ensuring people have opportunities for social interaction and engagement with their community.
  - Access to appropriate healthcare services when required.
  - Mental wellbeing – for all ages
  - Healthy Ageing – supporting people to stay independent and active.
- 6.9 The planning system can contribute significantly to health and wellbeing by ensuring that these are considered effectively at all stages of the planning process. The design of new developments can have a major influence on community health and wellbeing in a number of ways. Well-designed places should support and enable people and communities to live healthier lifestyles, thus improving community wellbeing and reducing pressures on local health and social care services.
- 6.10 Good design can achieve this through:
- Physical activity – Creating environments which encourage and support people to be active, through active travel, play, informal and formal leisure and sporting activities.
  - Social interaction – providing facilities and spaces that can be used for formal and informal social interaction and community activity and enable access to these services.
  - Green infrastructure – effective incorporation of multi-functional green infrastructure and spaces, providing benefits such as; access, play and recreation, attractive environments and wildlife habitat, flooding, climate and air quality management, relaxation and enhanced mental wellbeing.

---

<sup>41</sup> Recent survey data collected by Northamptonshire Public Health indicates that while over 75% of respondents are recorded as “active” – above national average – this still means almost a quarter are noted as being “inactive”



- Streets/ public spaces – distinctive, high quality, safe and interesting streetscapes and public realm; which are safe, interesting and attractive, accessible and not polluted.
- Quality homes – which support health and wellbeing, through providing adequate internal and external space, attractive, accessible design and are flexible to meet changing needs.
- Movement and access – providing infrastructure to encourage and enable access for all by prioritising non-motorised means of transport such as walking, cycling and horse riding, together with public transport, balancing access by private car with any negatives impacts.
- Safe environments – Creating safe environments by identifying risks from hazards such as crime and anti-social behaviour, noise and air pollution and designing the development to minimise these impacts.
- Food and healthy diet – Encouraging a healthy diet through providing spaces for community gardening and engagement with food, ranging from allotments, community orchards and gardens.
- Economy and employment – providing access to employment and learning opportunities and creating workplace environments which support employee health and wellbeing.
- Social and healthcare infrastructure – providing suitable infrastructure for community services that support health and wellbeing, including appropriate health care provision.

6.11 A range of good practice exists in regards to designing for good health and wellbeing. Three documents are cited as particularly useful references<sup>42</sup>. The local planning authority recognises the implications of air quality and pollution for health and wellbeing. In July 2020, the former East Northamptonshire Council introduced a requirement for air quality assessments supporting planning applications/ proposals to be prepared in line with the latest EMAQN guidance.

### **Health Impact Assessment**

- 6.12 Health Impact Assessment (HIA) enables the identification and assessment of the likely effects that a proposed development will have on the health and wellbeing of the community. The purpose of systematically assessing these impacts is to develop the proposals in a way that minimises negative health and wellbeing impacts and maximises positive contributions to community wellbeing, including reducing health inequalities.
- 6.13 Where a health impact is identified, any actions that have been/will be undertaken to reduce a negative impact or maximise a positive impact should be identified and described. The HIA process will enable health and wellbeing issues to be identified and assessed and the development proposals to be adjusted accordingly. The completed HIA

---

<sup>42</sup> Building for a Healthy Life - <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

Healthy Streets - <http://content.tfl.gov.uk/healthy-streets-for-london.pdf>

Active Design Guide - <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

will help enable relevant organisations to judge whether the proposal effectively addresses health and wellbeing issues and thus meet the relevant local planning policies.

- 6.14 In line with the Northamptonshire Planning and Health Protocol<sup>43</sup>, major applications (10+ homes or 1000m<sup>2</sup>+) will need to be accompanied by an appropriate HIA. This assessment will demonstrate how the development proposals promote good health and wellbeing and minimise any negative health and wellbeing impacts and thus meet policy requirements.
- 6.15 A local Rapid Health Impact Assessment (HIA) toolkit<sup>44</sup> has been developed to enable an assessment of the likely health impacts of spatial planning related proposals – including specific development proposals or planning applications. This should be used at the earliest practicable stage of the planning process, in order to influence the proposals as they are being developed.
- 6.16 Policy EN10 (below) sets out how health and wellbeing, will be managed within the planning system, including for example, the application of place shaping principles set out in JCS Policy 8 to ensure the delivery of good design that promotes health and wellbeing. It provides a mechanism for HIA to be incorporated into the development management system.

#### **Policy EN10: Health and wellbeing**

**Development proposals should demonstrate that the design will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimising any negative health and wellbeing impacts, through:**

- a) Effective application of -design and place shaping principles;**
- b) Creating a distinctive, high quality and accessible public realm which promotes and encourages physical activity and social engagement;**
- c) Having regard to the implications for and access to healthcare services and demonstrate how this will be addressed;**
- d) Engagement with local and national health bodies, including local NHS Clinical Commissioning Groups (or replacement body), to inform proposals relating to healthcare provision and / or access; and**
- e) Undertaking Health Impact Assessments at an early stage to ensure HIA influences the design process, for example, through pre-application advice, to ensure that the issues identified can be addressed or incorporated into the design proposals, and have regard to the Northamptonshire Planning and Health Protocol.**

**Health Impact Assessments will need to be objective and proportionate, dependent upon the scale of development proposed. In line with the Northamptonshire Planning and Health Protocol, all major development proposals (Development of**

<sup>43</sup>

[http://www.nnjpu.org.uk/site/assets/files/1456/updated\\_northamptonshire\\_planning\\_and\\_health\\_protocol\\_mar20.pdf](http://www.nnjpu.org.uk/site/assets/files/1456/updated_northamptonshire_planning_and_health_protocol_mar20.pdf)

<sup>44</sup> <http://www.nnjpu.org.uk/publications/northamptonshire-rapid-hia-for-planning-tool/>

**10 or more homes (or with a site area of 0.5 ha) or for non-residential development of 1000m<sup>2</sup> or more) will need to be accompanied by an appropriate HIA.**

### **Design and character**

- 6.17 The Joint Core Strategy (Policy 8) sets out a broad range of place shaping principles relating to connectivity, the public realm, local character and quality of life
- 6.18 The character of East Northamptonshire is defined by a range of built environment assets. There are a large number of distinctive streetscapes and buildings of character across the district.
- 6.19 The varied criteria set out in Policy 8 of the Joint Core Strategy relate to a range of development schemes. In the case of development management, over 80% of applications are minor schemes (householder applications, changes of use, schemes of 1-2 dwellings etc). A need to provide further direction regarding design and character through this Plan has been highlighted.
- 6.20 In some instances, Village Design Statements may provide additional local direction and information regarding character and design for a Parish or settlement. Village Design Statements. Local examples include Cotterstock<sup>45</sup>, and Pilton, Stoke Doyle and Wadenhoe<sup>46</sup> Village Design Statements; adopted as a Supplementary Planning Documents in September 2020 and February 2016, respectively. These provide detailed local guidance regarding the built vernacular and local styles.
- 6.21 Policy EN11 (below) sets out detailed criteria against which new buildings, and extensions to existing buildings, will be assessed within their immediate context or setting. Policy EN11 focuses upon the immediate setting of new development. Issues such as the wider setting, including connections to green infrastructure and ensuring walkable neighbourhoods are addressed through the place shaping criteria in Policy 8 of the Joint Core Strategy and Chapter 12 of the NPPF (Achieving well-designed places).
- 6.22 Policy EN11 and Policy 8 of the Joint Core Strategy are supported by various specialist supplementary planning documents. Most recently, the Householder Extensions SPD (adopted June 2020<sup>47</sup>) provides detailed guidance on extensions to residential properties in situations where they require Planning Permission. Earlier examples include the Domestic Waste Storage SPD (2012)<sup>48</sup>, providing additional local guidance regarding the provision of domestic waste storage facilities for new residential development and the Shop Front SPD (2011)<sup>49</sup>, which provides specialist guidance for retail business premises regarding new shop fronts and alterations to existing frontages. In addition, statutory bodies may apply their own adopted policies (e.g. Northamptonshire Parking Standards,

---

<sup>45</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11861/draft\\_cotterstock\\_village\\_design\\_statement](https://www.east-northamptonshire.gov.uk/downloads/file/11861/draft_cotterstock_village_design_statement)

<sup>46</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/9056/adopted\\_pilton\\_stoke\\_doyle\\_and\\_wadenhoe\\_village\\_design\\_statement](https://www.east-northamptonshire.gov.uk/downloads/file/9056/adopted_pilton_stoke_doyle_and_wadenhoe_village_design_statement)

<sup>47</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11668/householder\\_extensions\\_supplementary\\_planning\\_document](https://www.east-northamptonshire.gov.uk/downloads/file/11668/householder_extensions_supplementary_planning_document)

<sup>48</sup> <https://www.northnorthants.gov.uk/planning-strategies-and-plans/supplementary-planning-documents-spd>

<sup>49</sup> <https://www.northnorthants.gov.uk/planning-strategies-and-plans/supplementary-planning-documents-spd>

September 2016<sup>50</sup>) in providing detailed feedback or responses to inform the determination of applications.

## **Policy EN11: Design of Buildings / Extensions**

**Development proposals should relate well to and where possible enhance the surrounding environment, and will be supported where the design:**

- a) Integrates positively with the surrounding area and creates a continuity of street frontage in terms of appearance, layout, massing and scale;**
- b) Does not detract from the character of the existing building(s);**
- c) Creates visual interest through careful use of detailing and appropriate materials;**
- d) Is locally inspired where appropriate, reflecting local distinctiveness;**
- e) Incorporates accessible and well designed amenity space proportionate to the scale of the unit and space for waste management to serve the needs of all end users<sup>51</sup>;**
- f) In the case of Houses in Multiple Occupation, have regard to the minimum space standards as defined in ‘The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Order 2018<sup>52</sup> or any amendment to that Order; and**
- g) For all other developments, provide sufficient internal space in line with National Space Standards**
- h) Does not result in -significant harm arising from light pollution.**

### **Historic Environment**

- 6.23 The Joint Core Strategy and NPPF set out a range of policies for the protection of the historic environment or heritage assets. The historic environment should be recognised as a critical element of the cultural and tourist offering of the district. The district is home to a rich variety of designated and non-designated heritage assets, including scheduled ancient monuments, historic parks and gardens, and statutory and locally listed structures.
- 6.24 The Joint Core Strategy contains an overarching policy for the protection of the historic environment (Policy 2). The need to provide more detailed local direction through this Plan has been considered. This Plan identifies where additional policies are necessary to supplement Policy 2 of the Joint Core Strategy, with regard to both designated and non-designated heritage assets.

---

<sup>50</sup> <https://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Pages/northamptonshire-parking-standards.aspx>

<sup>51</sup> A typical garden length will be 10.5m

<sup>52</sup> <https://www.legislation.gov.uk/uksi/2018/616/contents/made>

## Designated Heritage Assets

- 6.25 As illustrated in the Area Portrait (section 2.0, above), the historic built environment of East Northamptonshire is rich and varied. The area is noted to contain the highest number of designated heritage assets within North Northamptonshire. These include scheduled ancient monuments, listed buildings, conservation areas, and registered parks and gardens. Notable sites include:
- Former Rothschild Estate at Ashton
  - Country houses including Apethorpe Palace
  - National Trust site at Lyveden
  - Key historic settlements such as Oundle, Higham Ferrers and Fotheringhay
  - Buildings and townscape of the boot and shoe industry
- 6.26 The Joint Core Strategy and this Plan take a proactive approach to addressing the current pressures on this valued resource. These measures include:
- a series of historic environment policies which target heritage asset types, which are of particular local concern;
  - robust criteria for the identification of non-designated heritage assets, given the high number of such assets in the district; and
  - landscape and design policies which address the important inter-relationship between the historic, built and natural environment.
- 6.27 National legislation provides statutory protection for designated heritage assets. However, to ensure the historic environment (including heritage assets and their settings) to be adequately protected and enhanced within the development management process, it is considered that a local strategic policy is necessary to reinforce this. The key consideration is the potential harm that might be caused to the heritage asset or its setting and the great weight that should be given to its conservation, proportionate to its level of significance, and how that is balanced against the proposed public benefits of development proposals; i.e. application of national policy and legislation in the local context.
- 6.28 Policy EN12 (below) recognises the key principles of the NPPF. The balancing principles referred to in Policy EN12 reflect paragraphs 199-202 of the NPPF, providing additional district level direction. In addition, the NPPF emphasises the importance of the opportunity that new development may provide to better reveal the significance of heritage assets. Listed Buildings and Scheduled Ancient Monuments are also subject to separate regulatory regimes.
- 6.29 There is a great deal of evidence available in the public domain relating to the historic environment which assists in the identification of historic significance. Principally this is held at the Northamptonshire Historic Environment Record. However, in the case of conservation areas, a number of them are supported by published appraisals and management plans, which are available through the Council's website. These evidence-base documents should be consulted and taken into account in the formulation of development proposals.

## Policy EN12: Designated Heritage Assets

**In considering proposals that affect a designated heritage asset or its setting great weight will be given to the asset's conservation.**

**Development proposals that protect and enhance the character, appearance and significance of designated heritage assets (and their settings), and that put them to viable uses consistent with their conservation, will be supported.**

**Where development:**

- a) protects and enhances heritage assets (including non-designated assets) and prevents harm to their significance and setting;**
- b) has been informed by a conservation area appraisal, landscape character assessment, village design statement or neighbourhood plan;**
- c) supports the sympathetic re-use of buildings of architectural or historic importance to ensure a positive contribution to the historic environment is maintained; and**
- d) conserves, protects and enhances heritage assets that are considered to be at risk.**

### **Non-Designated Heritage Assets**

- 6.30 A number of sites, structures and buildings have been identified as non-designated heritage assets through Conservation Area Appraisals and Management Plans, as well as relevant planning history. Any building, structure or feature (including designed landscapes) has the potential to be a heritage asset, where this can be demonstrated through appropriate evidence. It is necessary to apply policies for the protection of non-designated heritage assets in a proportionate way when considering the impact of a development proposal.
- 6.31 One way that this Plan can provide additional policy direction to non-designated heritage assets is through the preparation of a local list. The Joint Core Strategy (paragraph 3.15) specifically recognises the potential to provide additional protection for non-designated heritage assets, through the preparation of a local list. This recognises the need to apply consistent criteria, but does not provide further details as to what criteria should be applied.
- 6.32 Some made Neighbourhood Plans (e.g. Brigstock, Higham Ferrers and Raunds) include local lists. The previous Local Plan also included a limited local list, which would need to be reviewed and updated. In 2013, the former East Northamptonshire Council agreed a standardised methodology for assessing non-designated heritage assets, including production of a draft local list for the southern part of the former District (Planning Policy Committee, 22 July 2013<sup>53</sup>). However, the draft list was not taken forward; instead non-designated heritage assets may continue to be identified using the standard methodology as and when Neighbourhood Plans are prepared. The preparation and adoption of a local

---

<sup>53</sup> Item 7: [https://www.east-northamptonshire.gov.uk/meetings/meeting/429/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/429/planning_policy_committee)

list through a Neighbourhood Plan should provide enhanced weight in securing the protection of such heritage assets and/ or their setting.

- 6.33 In order to ensure consistency, Policy EN13 sets out further guiding principles for preparing local lists-and provides clarity on the types of buildings, sites and structures that the Council considers to be non-designated heritage assets, thereby setting a local blueprint or methodology for preparing a local list. It is not necessary for an asset to meet all relevant criteria, and the state of repair of an asset is not a relevant consideration when deciding whether or not a building, site or structure is a heritage asset.

### **Policy EN13: Non-Designated Heritage Assets**

**Development affecting a non-designated heritage asset (this relates to all relevant heritage assets not just those on a local list, i.e. non-designated historic parks and gardens; buildings and structures; and/ or archaeological remains) where it is designed sympathetically having regard to the significance of the asset, its features, character and setting will be supported. Development should seek to enhance the character of the non-designated heritage asset whether or not it is included in a local list.**

**Non-designated heritage assets should be conserved in a manner consistent with their significance. The assessment of proposals for new development that would impact on the demolition or total loss of a non-designated heritage asset will take into account the significance of the asset and the scale of harm or loss.**

**Whether a site, feature or structure is considered to be a non-designated heritage asset will be guided by the following criteria:**

#### **Historic parks and gardens**

- **Historic interest**
- **Proportion of the original layout still in evidence**
- **Influence on the development of taste whether through reputation or reference in literature**
- **Early or representative of a style of layout**
- **Work of a designer of local importance**
- **Association with significant persons or historical events**
- **Strong group value**
- **Within, or contributing to, a locally significant landscape**

#### **Buildings and structures**

- **Aesthetic/architectural merit**
- **Historic association**
- **Age and rarity**
- **Completeness**
- **Social or communal value**



## Assets of archaeological interest

- **The clarification provided by the Planning Practice Guidance and Historic England guidance on Local Heritage Listing as to what can be considered as a non-designated site of archaeological interest will be used. These non-designated sites may be included in the Northamptonshire Historic Environment Record.**

## Tourism and Culture

- 6.34 Tourism is a longstanding priority within the former East Northamptonshire area. The former Council's Economic Development Strategy specifies that the priority for economic growth should be those sectors "*that will make a significant contribution to improving the quality of life for residents whilst enhancing the quality of place and securing prosperity in the local economy*" (Economic Growth, Tourism and Regeneration Strategy 2017-2020<sup>54</sup>, paragraph 1.7). These include delivering increased tourism spending and job creation, particularly along the Nene Valley and in rural areas.
- 6.35 The Economic Development Strategy highlights the mix of unspoilt countryside, historic market towns and attractive villages, which contribute to the character of the district. The Council remains a key partner in the Destination Nene Valley (DNV) partnership<sup>55</sup> which promotes a diverse range of arts festivals and other cultural events throughout the Nene Valley between Northampton and Peterborough, including the Nene Valley Festival, held each September.
- 6.36 Cultural attractions can be based on a variety of different interests. Art galleries, environmental attractions, museums, historic buildings and landscapes may define cultural interest. These are one mechanism by which improved participation in active leisure and recreation may be achieved (recognised in the Economic Development Strategy), thereby securing broader net gains to overall public health and wellbeing. The development and expansion of cultural attractions should therefore be supported by an appropriate policy framework, to ensure that their success and integrity is not compromised.
- 6.37 The Joint Core Strategy contains several policies to enhance the area's tourist and cultural assets and support proposals to expand the tourist industry (Policy 22(e)). The Joint Core Strategy also seeks to promote tourism through delivering net improvements to Green Infrastructure (Policy 19), emphasising the importance of Oundle and Thrapston as gateways to the Nene Valley (Policy 20(b)) and the Rockingham Forest as tourist and recreation attractions (Policy 21(d)). Recent developments such as Rushden Lakes and the Greenway have also delivered enhanced connectivity between the urban areas of Higham Ferrers, Irthlingborough and Rushden and the Nene Valley. Growth in the tourist economy balanced with the delivery of enhancements to GI corridors will be promoted through this Plan.

## Cultural developments

---

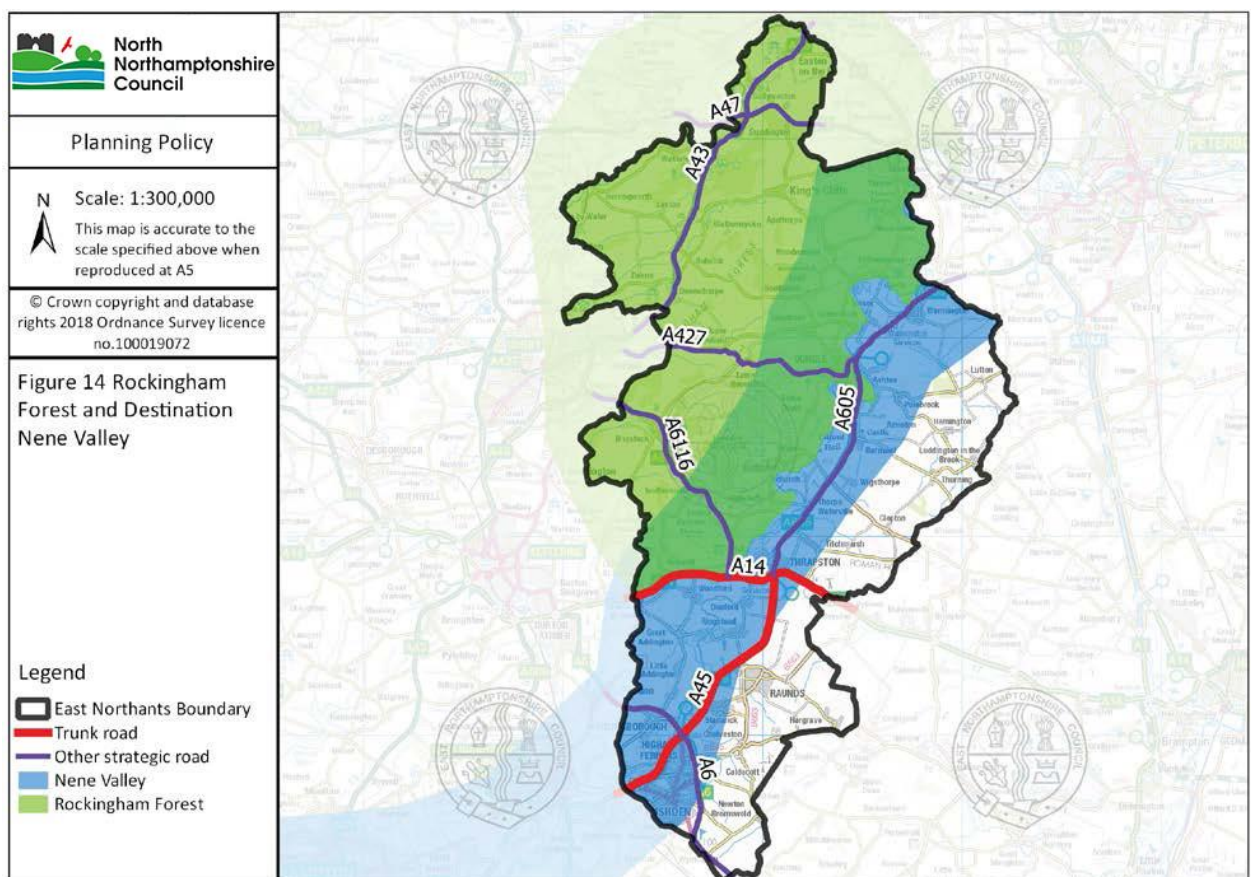
<sup>54</sup> [https://www.east-northamptonshire.gov.uk/site/scripts/download\\_info.php?downloadID=479&fileID=2016](https://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=479&fileID=2016)

<sup>55</sup> [www.nenevalley.net](http://www.nenevalley.net)



- 6.38 East Northamptonshire has a wide range of tourist and cultural assets, from the River Nene to churches and idyllic villages, to significant tracts of woodland, many of which contribute to defining the Rockingham Forest. These all benefit the existing residents and workforce but also appeal to visitors and tourists. It is important to not only protect and enhance the existing attractions but to actively support new tourist and visitor attractions through the planning system, including rural tourism.
- 6.39 Cultural attractions such as theatres, museums, galleries, concert halls, cinemas and hotels are all defined as main town centre uses (NPPF Annex 2). The NPPF (paragraphs 87-91) requires that larger scale proposals for new cultural assets will be subject to the Sequential and Impact Tests for main town centre uses, although smaller scale rural office, tourist or other small scale developments are exempt.
- 6.40 Many tourist and cultural assets are associated with the Nene Valley (spatial corridor defined by [www.nenevalley.net](http://www.nenevalley.net); incorporated into Figure 9, below). Most are sited in locations that provide optimum opportunities for non-motorised vehicular access, utilising dedicated off-road routes such as the Greenway. Committed or established tourist destinations such as Fineshade, Lyveden New Bield, Rushden Lakes, Stanwick Lakes and Oundle Marina already include provision for cultural uses which would otherwise be regarded as main town centre uses.

**Figure 9: Rockingham Forest and Destination Nene Valley**



- 6.41 In order to promote tourism and attract visitors to the area it is important to provide a range of accommodation options. The initial stakeholder engagement and the Economic Development Strategy highlighted the lack of overnight tourist accommodation

throughout the district. Maintaining the existing stock of tourist accommodation and increasing the overall offer of the district will be key objectives for this Plan.

### **Tourist accommodation – north of the District**

- 6.42 Across the predominantly rural north of the district, there are a limited number of camping locations, B&Bs, independent hotels and a few chain hotels located alongside main highway routes. The north of the district is relatively well served with facilities sites include Top Lodge, Fineshade; New Lodge, Laxton (A43); the Talbot Hotel, Oundle and Yarwell Mill. Several village pubs in the rural north of the district also offer overnight (B&B) accommodation. For example, in nearby towns such as Stamford to the north there is a wider offer of overnight accommodation including large hotels.
- 6.43 Recent consents include a proposed Rockingham Forest Park, which includes 55 tourist accommodation lodges and 9 camping pitches at Jack's Green, Nassington. If this scheme is implemented it will offer a significant improvement to the overall provision of tourist accommodation for the rural north of the district.

### **Tourist accommodation – south of the District**

- 6.44 By contrast to the north, in the southern part of the district (south of the A14) tourist accommodation is limited, with few hotels and inns offering overnight accommodation. Therefore, a need to promote and provide for additional hotels or other tourist accommodation to the south of the district is emphasised. It is important to recognise that to attract overnight visitors that want to enjoy all that there is on offer in East Northamptonshire, that accommodation needs are met. This could take place with the re-use of redundant buildings in settlements, new provision in the towns, or further camping locations in rural areas. In order to enhance and reinforce the existing characteristics of the district, it will be expected that the highest level of sustainability should be achieved.

### **Promoting sustainable tourism**

- 6.45 Sustainable transport modes from tourist attractions and accommodation offers will be critical to ensure any adverse impacts, arising from increased tourism activity, is minimised. It will be important to roll out programmes, such as the Greenway, in order to promote further connections to the key attractors and also for new provision to deliver further links into the network.
- 6.46 It is reiterated that the one of the most significant issues affecting the tourist industry concerns the lack of overnight accommodation, particularly in the south of the district. This issue is reflected in national policy which sets a general presumption in favour of reusing redundant rural buildings for residential use (NPPF paragraph 80(c)). It is important that this Plan provides appropriate direction to ensure that further losses to existing tourist accommodation do not occur.
- 6.47 In accordance with Policy 25 of the Joint Core Strategy, the small scale development of self-catering accommodation through the conversion of, for example, farm buildings which could supplement farm incomes, or outbuildings attached to public houses should be supported.
- 6.48 This Plan will maximise opportunities to support sustainable growth in the tourism industry through supporting the development of tourism, in particular new hotels and tourist accommodation, especially in priority locations such as the Nene Valley and

Rockingham Forest. In order to proactively support arts, culture and tourism related development within the Rockingham Forest and Destination Nene Valley corridor, new proposals for these uses should be exempt from the Sequential and Impact Tests (Policy EN14, below).

- 6.49 Policy EN14(a) sets out relevant criteria for managing tourism and cultural developments in the Nene Valley corridor and the Rockingham Forest. These should not adversely affect sensitive receptors (the SSSI and SPA) and would be subject to the SPA Mitigation Strategy with regard to potential impacts of tourism upon the integrity of the SPA/ Ramsar site. Outside of these areas, Sequential and Impact Tests will apply for main town centre uses (i.e. cultural developments, hotels etc) in the normal way.
- 6.50 The potential impacts of proposals for new tourism, cultural developments and tourist accommodation on the Upper Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the Special Protection Area SPD set out requirements for developments with the potential to have an adverse impact on the SPA. Development with the potential to cause an adverse effect on the SPA must meet the requirements of JCS Policy 4, or any subsequent replacement or update to that policy. A Habitats Regulations Assessment may be required to accompany any planning application to demonstrate the absence of any such adverse effect.

#### **Policy EN14: Tourism, cultural developments and tourist accommodation**

- a) Within the Destination Nene Valley corridor and Rockingham Forest areas, as shown on the Policies Map, proposals for the development of hotels (particularly in the South of the District), new tourist and/ or cultural assets, or the expansion of existing sites, to support established tourism assets, will be supported provided that these:**
- i. Deliver enhanced connectivity to the Greenway and other defined Green Infrastructure corridors, as referred to in Policies EN5 and EN6; and**
  - ii. Do not have an adverse impact on the surrounding countryside e.g. King's Cliffe Hills and Valleys area of tranquillity (Joint Core Strategy Policy 3(f)).**

**Beyond the Destination Nene Valley corridor and Rockingham Forest areas, tourist and cultural developments will be supported where these comply with other relevant local and national planning policies.**

- b) Throughout the District, new-build tourist accommodation, or the conversion of dwellings or redundant or disused rural buildings to guest house or bed and breakfast use will be supported, where new-build accommodation is appropriate to its location and respects the setting,**

**quality and character of its surrounding hinterland.**

**In order to manage such developments it will be necessary to use suitable planning conditions and/ or legal agreements to ensure that these are retained for tourist accommodation.<sup>56</sup>**

### **Education and training**

- 6.51 The 2017 North Northamptonshire Infrastructure Delivery Plan and 2021 East Northamptonshire Local Infrastructure Plan identify strategic infrastructure requirements necessary to support growth. This is particularly relevant when considering education, learning and training, where a mixture of localised and strategic infrastructure projects may be required to support growth. Policy 10 of the Joint Core Strategy provides the principal mechanism by which development contributions towards education can be sought.
- 6.52 In addition to securing development contributions to mitigate the impacts of new development, the Council and the Department for Education (DfE) have strategic responsibility for local authority maintained schools, academies and Free Schools, respectively. The Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011)<sup>57</sup> sets out the Government's approach to support the development of state-funded schools and their delivery through the planning system.
- 6.53 The DfE identifies that the Plan should give consideration to evidence on education capacity and need, to ensure that developer contributions towards education infrastructure (school expansions or new schools), can be effectively secured in accordance with Policy 10 of the Joint Core Strategy. In this way, these obligations can be made clear to developers and other stakeholders in assessing both viability of this Plan and development proposals.
- 6.54 The Government (DfE) has considered Rushden's Growth Town status and the Rushden East allocation (Joint Core Strategy, Policy 33), initially putting forward proposals through the draft Plan consultation, November 2018 – February 2019 (Specialist School Site consultation paper, January 2020<sup>58</sup>). In light of the SUE proposals and strategic educational infrastructure requirements, the DfE and the former County Council identified an overwhelming need for additional educational facilities for students aged 11-18 with a Statement of Special Educational Needs or an Education, Health and Care Plan for moderate learning difficulties to severe learning difficulties, including students with autism. This has been addressed by the development of a new Free School to the south of Chelveston Road, Higham Ferrers (east of the town), with a full capacity of 145 pupils which opened in September 2021.

---

<sup>56</sup> Under the 2015 Deregulation Act a residential property may be let for up to 90 days in a calendar year as tourist accommodation, above which a change of use is deemed to have occurred.

<sup>57</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6316/1966097.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf)

<sup>58</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11673/appendix\\_3\\_-\\_specialist\\_school\\_site\\_provision](https://www.east-northamptonshire.gov.uk/downloads/file/11673/appendix_3_-_specialist_school_site_provision)

## 7.0 Economic prosperity

- 7.1 Policy 22 of the Joint Core Strategy (Delivering Economic Prosperity) sets out North Northamptonshire's overarching approach to economic development and sets a target net increase of 31,100 jobs across the North Northamptonshire area. This is further defined in Joint Core Strategy Policy 23 (Distribution of New Jobs) which sets an East Northamptonshire target for a net increase of 7,200 jobs (Policy 23/ Table 3) across all economic sectors within the Plan period (2011-31). Local economic development is being driven by the 2018 initiative *Enterprising East Northants*<sup>59</sup>, which is underpinned by the former Council's Economic Strategy 2017-2020.
- 7.2 In response to the Covid-19 national emergency the *Recovery Through Enterprise*<sup>60</sup> prospectus details East Northamptonshire Council's response to the economic shock resulting from the pandemic. This response builds on the *Enterprising East Northants* economic initiative and is being developed within the context of an ongoing strategic approach through a national economic recovery group, the Oxford Cambridge Arc (OCA), the South East Midlands Local Enterprise Partnership (SEMLEP) and the Northamptonshire Local Resilience Partnership. The prospectus aims to act as a local mechanism for joining up and driving delivery at a local level.
- 7.3 Conventionally, employment monitoring has related to business, industrial (heavy and light) or logistics uses (formerly referred to as 'B' Use Classes, in the 1987 Use Classes Order and subsequent amendments). This is a reflection of historical monitoring regimes, which have focused upon the quantum of business, industrial and logistics uses that have been developed. Current national policy identifies a distinct separation between main town centre uses and other employment uses. The Use Classes Order was comprehensively revised in 2020, although the NPPF maintains the town centre/ other economic uses differentiation. Further details, cross referencing the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020<sup>61</sup>, are set out at Appendix 2 of this Plan.

### **Macro-economic context: Strategic economic strategies**

- 7.4 To help set out effective district level policies, this Plan should consider and reflect the strategic economic framework. The district forms the northernmost part of the South East Midlands Local Enterprise Partnership (SEMLEP) area; centred upon Milton Keynes and Northampton, and ranging from Corby, Oundle and the rural north of the district in the north, to Bicester, Aylesbury and Luton in the south. Its east-west extent lies between Biggleswade (east) to Banbury (west). SEMLEP also recognises the implications of major sub-regional centres beyond: London, Birmingham, Cambridge, Oxford, Leicester and Peterborough.

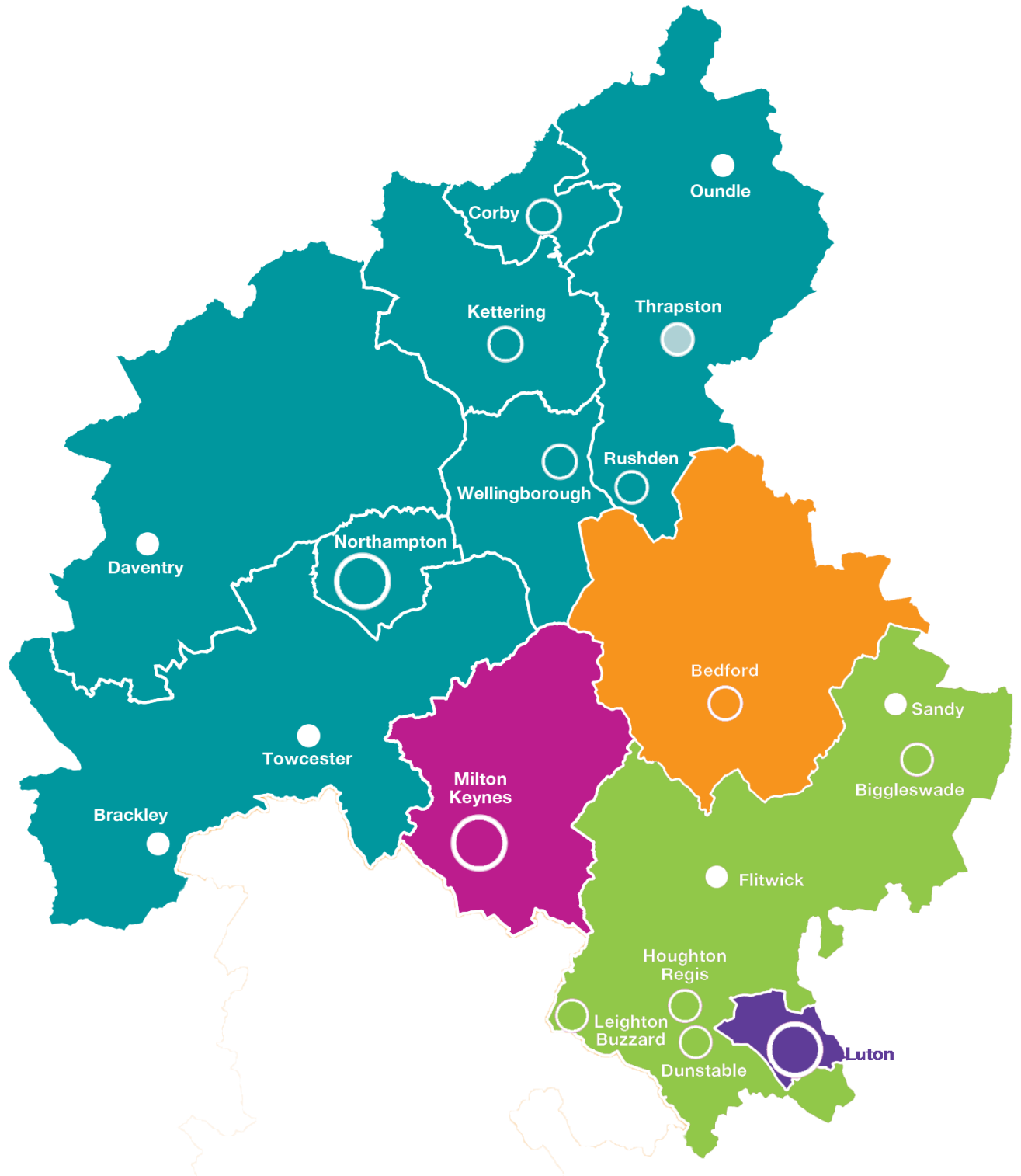
---

<sup>59</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/10850/enterprising\\_east\\_northants\\_strategy\\_2018](https://www.east-northamptonshire.gov.uk/downloads/file/10850/enterprising_east_northants_strategy_2018)

<sup>60</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11859/recovery\\_through\\_enterprise\\_prospectus](https://www.east-northamptonshire.gov.uk/downloads/file/11859/recovery_through_enterprise_prospectus)

<sup>61</sup> <https://www.legislation.gov.uk/uksi/2020/757/contents/made>

Figure 10: South East Midlands area (Strategic Economic Plan, Figure 1, p9)



7.5 The SEMLEP Strategic Economic Plan<sup>62</sup> was updated in November 2017 to reflect the incorporation of the former Northamptonshire Enterprise Partnership into SEMLEP from 1 April 2017. The Strategic Economic Plan applies a long term vision, seeking to double

<sup>62</sup> <https://www.semlep.com/strategic-economic-plan/>



the value of goods and services produced across the area by 2050<sup>63</sup>. This Plan should understand and reflect SEMLEP's strategic priorities. The Strategic Economic Plan emphasises the opportunities offered by the development of the Cambridge-Milton Keynes-Oxford Growth Corridor, now known as the Oxford Cambridge Arc (OCA), to transform the area into a hub of knowledge intensive industry, to achieve a vision for the Corridor as "*the UK's Silicon Valley – a world renowned centre for science, technology and innovation*".

7.6 The Strategic Economic Plan itself defines an overarching vision, that: "*The South East Midlands will build on its reputation as a premier location for growth, innovation, creativity and world-leading technologies*". To deliver this vision, it sets the following economic priorities:

1. High-Performance Technology, including Next Generation Transport, to deliver commercialisation of innovation;
2. Increased levels of private sector investment and grow jobs by 10% by 2025;
3. Deliver greater trading activity between companies;
4. Deliver sufficient new homes to meet the needs of the growing population;
5. Deliver the infrastructure needed, including much-improved Broadband and wireless connections;
6. Ensure that growth is undertaken in a manner that promotes social inclusion, equality and environmental sustainability.

7.7 The Strategic Economic Plan highlights the SEMLEP growth hub's active engagement with businesses, supporting these to set up and scale up. It emphasises the function of productivity-led growth i.e. innovation, enterprise, skills, physical capital (suitable infrastructure and premises) and competition. It also seeks to promote the South East Midlands to prospective investors, to ensure that sufficient and suitable employment land and premises are made available. This supports the 2019 South East Midlands Local Industrial Strategy (LIS)<sup>64</sup>, which sets out collective ambitions for the whole of the OCA, as well as specific ambitions for the SEMLEP area within it.

7.8 This Plan considers how the overarching Strategic Economic Vision and economic priorities could be achieved at a local level. The Joint Core Strategy contains a range of policies for delivering economic prosperity (policies 22-25). These, however, pre-date SEMLEP economic priorities. The Plan provides policy direction, building on the principles set out through Enterprising East Northants and acknowledging the economic priorities of SEMLEP, OCA and central Government.

### **Priority economic sectors**

7.9 There are a number of economic sectors for which this Plan is well placed to define spatial and more detailed local site specific proposals such as the East Northamptonshire Enterprise Centre at Warth Park, Raunds which is now completed and operating . The Joint Core Strategy (paragraph 8.9/ Policy 22) identifies priority employment sectors. This aligns to Enterprising East Northants and the South East Midlands LIS priorities; investment in skills, industries and infrastructure to boost productivity by backing businesses to create high quality well paid jobs. This will be achieved by enhancing the

---

<sup>63</sup> Known as "Gross Value Added", or "GVA"

<sup>64</sup> <https://www.semlep.com/industrial-strategy/>

skills base wherever possible; e.g. nurturing and promoting enterprise and entrepreneurship are identified as a key focus for the Enterprise Centre. Priority sectors are highlighted as follows:

- Life Science in supporting local niches and the international offer as part of the wider Oxford Cambridge Arc;
- Creative and cultural industries with focus on the emerging TV, Film and digital media sector;
- Visiting economy with focus on hospitality, attractions and retail;
- Logistics – storage and distribution;
- High performance technologies; and
- Renewable and low carbon energy and green technologies, including food production.

7.10 It was anticipated in the Joint Core Strategy that high performance technologies, particularly related to motorsports would be located at the Rockingham Motor Speedway/ Enterprise Area. In recognition of the fact that motorsport activities at Rockingham Motor Racing Circuit Enterprise Area have proved difficult to establish, significant changes to the strategic policies would need to be considered as part of a forthcoming Joint Core Strategy review; anticipated to start following the vesting date for the new North Northamptonshire unitary authority (1 April 2021), with a focus on life sciences, renewable energy and creative and cultural industries.

7.11 The importance of renewable energy technologies is emphasised, given the Government's legal commitments to to reduce carbon dioxide emissions to 80% below 1990 levels by 2050 set out in the Climate Change Act 2008<sup>65</sup> and subsequently signed up to in the Paris Agreement. This is also highlighted in SEMLEP's Energy Strategy (December 2018)<sup>66</sup>, which also sets an objective of ensuring that energy availability does not limit the area's growth and prosperity.

7.12 SEMLEP's identified key economic sectors correspond to the Joint Core Strategy priority economic sectors. The Strategic Economic Plan identifies particular strengths across the South East Midlands, in high performance technologies (e.g. autonomous vehicles, next generation transport), manufacturing technology (e.g. food and drink, footwear), logistics, the creative/ cultural sector and tourism. The Joint Core Strategy (Policy 22) supports the co-ordination of skills and training with sector specific requirements; e.g. through training and employment agreements.

7.13 At a district level, Enterprising East Northants defines local economic development priorities. As with the Strategic Economic Plan, the Council's strategy recognises the opportunities provided by Rushden Lakes, Rushden East, the Nene Valley and Tresham Garden Village. It also recognises the emerging importance of the OCA, reiterates the importance of the visitor economy (i.e. tourism) and highlights specific growth sectors of the economy such as life sciences. Enterprising East Northants sets an overarching economic vision for the district:

---

<sup>65</sup> <https://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>66</sup> [https://www.semlep.com/modules/downloads/download.php?file\\_name=1271](https://www.semlep.com/modules/downloads/download.php?file_name=1271)



*“To secure sustainable job growth that will make a significant contribution to improving the quality of life for residents whilst enhancing the quality of place and securing prosperity in the local economy.”*

7.14 Recently delivered and emerging major developments throughout the district reflect the key economic sectors, highlighted in the North Northamptonshire Economic Prospectus (September 2020)<sup>67</sup>:

**Existing sectors:**

- **Logistics** – major distribution centres developed at Warth Park, Raunds (Phase 2) and Islip Furnace (Primark);
- **Manufacturing** – Howden’s site, Warth Park (Phase 3);
- **Retail and leisure/ visitor economy** – Phases 1 of Rushden Lakes opened July 2017, with phases 2-4 opening in July 2019 and potential for further phases to be delivered within the plan period.

**Future opportunities:**

- **Renewable and low carbon energy** – expansion of renewable energy capacity and low carbon innovations at Chelveston Renewable Energy Park;
- **High performance technologies** – appropriate new employment uses will be considered for the Rockingham Motor Speedway/ Enterprise Area;
- **Research and development** – sectoral growth in specialisms such as life sciences and construction.

7.15 Significant logistics, renewable energy and tourism developments have been delivered within the first half of the Plan period. However, it is recognised that to remain competitive the East Northamptonshire area needs to expand its attraction locally, both through developing its core sectors and a continued focus upon the training and skills base. Employment development is anticipated at Rockingham Motor Speedway/ Enterprise Area during the Plan period, although for the purposes of Local Plan monitoring any new jobs would count against the Corby target (9,700 jobs across Corby Borough, 2011-2031), rather than that for East Northamptonshire.

7.16 The Strategic Economic Plan highlights construction as a further driver for growth throughout the South-East Midlands area, including an expansion of apprenticeships. This reiterates the Government’s growth priorities, particularly regarding housebuilding. Other priority sectors such as green technologies are already highlighted in the Joint Core Strategy (Policy 22), with research and science (e.g. Life Sciences) similarly identified by SEMLEP. The 2019 Local Industrial Strategy, which covers the SEMLEP and wider OCA, also reiterates the importance of commercialisation for the central area which includes the former East Northamptonshire District.

**Delivering jobs**

7.17 The Joint Core Strategy Monitoring and Implementation Framework focuses on monitoring the numbers of jobs delivered over the Plan period. This does not, however, set sectoral targets. Instead, the Joint Core Strategy sets an overall requirement for a net

---

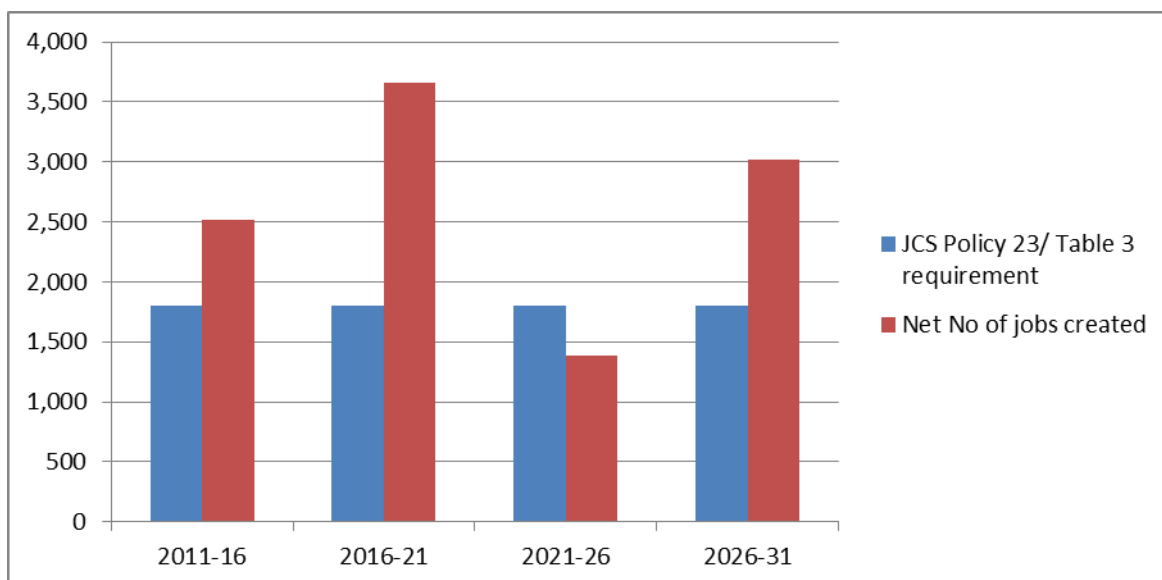
<sup>67</sup> [http://www.nnjpu.org.uk/site/assets/files/1459/16461\\_nn\\_economic\\_prospectus\\_final\\_26\\_06\\_20.pdf](http://www.nnjpu.org.uk/site/assets/files/1459/16461_nn_economic_prospectus_final_26_06_20.pdf)

growth target of 7,200 jobs across all employment sectors for East Northamptonshire (Policy 23/ Table 3).

7.18 Delivery of the 7,200 jobs requirement will entail a net increase of 360 jobs per year during the Plan period. The jobs delivery trajectory has been undertaken on the basis of five-year blocks (Table 9 and accompanying graph, below). This shows job growth being above the policy target which is good for the economy of the area.

**Table 9: Jobs delivery trajectory**

| Table 5      | Joint Core Strategy Policy 23/ Table 3 requirement | Net No of jobs created | Difference (Joint Core Strategy Table 3 requirement minus Net No of jobs created) |
|--------------|--|------------------------|---|
| 2011-16      | 1,800  | 2,520                  | -720  |
| 2016-21      | 1,800  | 3,665                  | -1,865  |
| 2021-26      | 1,800  | 1,382                  | 418   |
| 2026-31      | 1,800  | 3,015                  | -1,215  |
| <b>TOTAL</b> | <b>7,200</b>                                       | <b>10,582</b>          | <b>-3,382<sup>68</sup></b>  |



### 2011-2021

7.19 During the first quarter of the Plan period (2011-2016) it is estimated that just over 2,500 jobs<sup>69</sup> were created, from significant developments that have already taken place. The most substantial developments delivered during this period include:

- Primark, Islip (over 1,300 jobs);
- Warth Park (Phase 2), Raunds (over 600 jobs); and

<sup>68</sup> Table 9 shows a “negative” jobs figure, indicating that the Joint Core Strategy requirement for 7,200 jobs should be exceeded by 3,382 jobs by 2031

<sup>69</sup> Data regarding job numbers has been collected from a range of sources, including planning application forms, planning statements or economic statements that accompany applications, as set out in Background Paper 5. However, it is recognised that numbers may vary between the granting of permission and implementation.

- Scottish Widows, Shipton Way, Rushden (over 300 jobs).

7.20 It is anticipated that during the current (second) quarter of the Plan period (2016-2021), nearly 3,900 jobs are expected to be created. Monitoring has identified a number of schemes, which have delivered or are expected to deliver, between 10 and 250 jobs. The most significant developments, recently delivered or currently under construction, are:

- A later development phase (Phase 3) by Howdens, at Warth Park, south of Meadow Lane, Raunds (600 jobs); and
- Phases 1-4 of Rushden Lakes (over 2,700 jobs).

7.21 The large number of jobs that are anticipated to come forward during the 2016-2021 period (Table 9, above) are largely a reflection of the Rushden Lakes development.

### **2021-2031**

7.22 During the second half of the Plan period (third and fourth quarters; i.e. 2021-2031) further significant employment sites are anticipated to come forward. The following strategic employment sites are anticipated to deliver the remaining jobs requirements over the rest of the Plan period:

- Rockingham Motor Racing Circuit Enterprise Area, Corby/ Deene, although job creation at this location will be counted as part of Corby Borough's jobs requirement (which is 9,700 jobs across Corby Borough, 2011-2031);
- Chelveston Energy Innovation Park, to deliver zero-carbon solutions for industry, integrating high energy consumer businesses with large scale direct-supply renewable energy (estimated around 800 jobs);
- Oundle Marina currently functions as a hub for small businesses, but the consented redevelopment scheme (granted in 2018) for holiday accommodation, improved marina facilities, pub/ restaurant, retail and business accommodation, boatyard, clubhouse and associated infrastructure has the potential for significant future job creation , if implemented;
- West End/ Warth Park, Raunds (up to 700 jobs, including 400 at the East Northamptonshire Enterprise Centre);
- Rushden Gateway, Nene Valley Farm, Rushden (nearly 500 jobs at strategic employment land site, allocated in the Joint Core Strategy, Policy 35); and
- Rushden East (up to 1,500 jobs by 2031; i.e. 2,500 jobs gross in line with the Vision Statement, to provide a mix of employment opportunities to expand the local economy with the aim of matching the number of new jobs created to the number of new homes built, focusing upon higher skilled economic sectors such growing digital technology).

7.23 Other significant sites are anticipated to come forward during the latter quarter of the Plan period. However, these are anticipated to come forward beyond 2026, so have not been included within the deliverable employment land supply:

- Tresham Garden Village, Deenethorpe (estimated 1,500 jobs gross – 500 jobs within the current Plan period – on the basis of a 1:1 jobs to households ratio, as set out in the 2018 Tresham Garden Village Masterplan)<sup>70</sup>;
- Irthlingborough West (over 950 jobs, 340 net by 2031; a mixture of office, industrial and logistics uses); and
- Former Rushden & Diamonds FC stadium site, Nene Park, Irthlingborough (estimated around 300 jobs).

7.24 Further details about jobs already delivered together with the trajectory for the remainder of the Plan period are set out in the Jobs Background Paper (BP5)<sup>71</sup>. The summary assessment (Table 9, above) estimates that over 10,500 jobs (i.e. 3,382 in excess of the Joint Core Strategy requirement) will be delivered during the Plan period. Even in a scenario discounting sites where deliverability is uncertain; e.g. Irthlingborough West, Tresham Garden Village, and Nene Park, the Joint Core Strategy requirement for 7,200 jobs should be comfortably exceeded, by over 2,200 jobs, providing a significant contingency to cover any potential fallout from macro-economic events such as the Covid-19 pandemic or Brexit.

7.25 Major development sites that are expected to come forward during the remainder of the Plan period are expected to deliver significantly in excess of the Joint Core Strategy requirement. On this basis there is no need identified for further strategic employment sites to be allocated through this Plan; instead the focus will be upon delivering the remaining employment sites that are already in the pipeline, maximising opportunities for delivering high quality jobs in the priority sectors, alongside the retention and performance of existing employment areas. Whilst this Plan prioritises delivery of the remaining employment sites identified, it is also recognised that sites coming forward exceed the Joint Core Strategy target. This should be addressed through a forthcoming review of the Joint Core Strategy from 2021, in respect of future strategic employment growth.

### **Rushden Lakes West**

7.26 Over and above the major outstanding employment land commitments anticipated to be delivered during the remainder of the Plan period, further potential economic development opportunities may be identified. Employment land commitments in and around Rushden Lakes (e.g. Rushden Gateway) and Stanton Cross (Wellingborough East) should provide opportunities to further enhance the A45 corridor between Wellingborough and Rushden as a focus for economic growth, as emphasised in the Joint Core Strategy (paragraph 5.6). There is also potential for integration of these and existing Nene Valley employment sites by way of the Greenway (section 6.0, above).

7.27 Permission has been granted for a mixed use development to the west of Rushden Lakes (reference 19/01092/FUL, approved 16 September 2020). When implemented, this new development (known as “Rushden Living”) will deliver the following:

<sup>70</sup> In the case of Tresham Garden Village the proposal represents an exception to the overall urban focused spatial development strategy. Successful implementation of this site falls outside (i.e. over and above) the strategic housing and jobs requirements and it therefore should not be included as part of the overall strategic employment land supply for jobs delivery. Nevertheless, it is anticipated that jobs creation at Tresham will be taken into account in assessing future requirements in reviewing the Joint Core Strategy, given that this development is already likely to be happening by the time that this review is completed (beyond 2021).

<sup>71</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12106/background\\_paper\\_5\\_-\\_job\\_targets](https://www.east-northamptonshire.gov.uk/downloads/file/12106/background_paper_5_-_job_targets)

- A mix of employment uses, consisting of retail, restaurants, offices, leisure and ancillary/ business uses, including;
- A new link road between Ditchford Lane and Rushden Lakes, incorporating footpaths, cycleways and associated works;
- Structural landscaping and sustainable drainage systems, to deliver green and blue infrastructure enhancements; and
- Opportunities for local manufacturers to showcase their brands and explain the manufacturing process and/ or local/ regional independent businesses e.g arts, crafts, antiques and artisans.

7.28 This mixed development should promote the wellbeing of Rushden and the wider area. It will deliver broader strategic benefits such as new green infrastructure connections between Rushden Lakes and Stanton Cross (Greenway Forward Plan, Phase 4). However, in implementing this scheme, developers will need to work closely with Natural England to ensure that the scheme does not lead to any significant adverse impacts for the adjacent SPA/ Ramsar site.

### **Longer term economic growth opportunities**

7.29 The Strategic Economic Plan sets a long term economic vision for the South East Midlands area, for the first half of the 21<sup>st</sup> century. The Plan should acknowledge this vision, although jobs growth beyond 2031 is a matter for a review of the Joint Core Strategy, having regard to the growth aspirations arising from the Oxford/ Cambridge Arc. If the North Northamptonshire Growth Deal bid is successful, there could be a step change in the requirement for new employment opportunities linked to the acceleration of housing growth across the district and the rest of North Northamptonshire.

### **Skills and innovation**

7.30 SEMLEP emphasises the importance of technological innovation as a key priority for the South East Midlands area. To enhance skills development, SEMLEP has worked alongside employers in developing a “Growing People Skills Plan” (November 2017)<sup>72</sup>, to meet the skills needs of local employers and unlocking peoples’ potential. Enterprising East Northants also reflects this priority; for: “*Boosting the Skills Base of local businesses and communities*”. The Economic Strategy also highlights a range of economic sectors where skills gaps are lacking e.g. health and social care and mechanical engineering.

7.31 The Council is proactively working with employers and other partners in the training and educational sectors to address skills shortages. A number of initiatives have already been delivered including the Business Charter, which has been prepared to strengthen the Council’s working relationship with local businesses, to enhance the services delivered and secure job creation for the district.

7.32 Enterprising East Northants recognises the importance of major developments in delivering the vision:

- Rushden East Sustainable Urban Extension, with focus on knowledge economy employment in the life sciences and creative industries;
- Tresham Garden Village; and

---

<sup>72</sup> <https://www.semlep.com/growing-people-skills-plan/>

- The Enterprise Centre (Michael Way, Raunds) and other associated public led developments to provide the quality of commercial space to drive the rebalancing of the economy towards knowledge higher paid jobs and once that is underpinned by innovation, enterprise and entrepreneurship.

- 7.33 The Joint Core Strategy already provides detailed direction for delivering Rushden East and Tresham Garden Village. The Enterprise Centre at Michael Way (north of Warth Park), Raunds was opened in summer 2020, with a focus upon ensuring throughput to nurture and encourage business start and growth.
- 7.34 The new Enterprise Centre provides a new blueprint for how the growth of new SMEs may be supported. Dependent upon the performance of the Enterprise Centre, other possible opportunities for such developments may be considered elsewhere within the Plan area. On this basis it is necessary to set policy directions for any such future projects. Policy EN15 (below) provides such parameters. It will also be necessary to ensure, by way of conditions and/ or legal agreements if necessary, that any future commercial space projects will function to support a pipeline of business growth from start up to scale up and beyond. Future proposals should recognise existing provision and work to complement this. In this way, capacity for small and medium enterprises could be enhanced.
- 7.35 The potential impacts of proposals for new commercial development on the Upper Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the Special Protection Area SPD set out requirements for developments with the potential to have an adverse impact on the SPA. Development with the potential to cause an adverse effect on the SPA must meet the requirements of JCS Policy 4, or any subsequent replacement or update to that policy. A Habitats Regulations Assessment may be required to accompany any planning application to demonstrate the absence of any such adverse effect.
- 7.36 The following policy seeks to support the potential for small and medium-size enterprises (SMEs) which play an important role in the economy, they are generally entrepreneurial in nature, helping to shape innovation. Small-sized enterprises typically number fewer than 50 employees, whilst medium-sized enterprise comprise less than 250 employees. In addition to small and mid-size companies, there are micro-companies, which employ up to 10 employees.

**Policy EN15: Development of Commercial space to support economic growth for Small and Medium-sized enterprises**

**Proposals for the development of new commercial employment space will be supported where these will deliver flexible managed workspace for small medium, and micro-businesses.<sup>73</sup> Such projects should:**

- a) Provide a range of unit sizes to meet demand across the whole business pipeline;**
- b) Provide for adequate parking, in line with the Northamptonshire**

<sup>73</sup> For the purposes of awarding structural funds etc, the European Union defined small businesses as up to 50 staff; micro-businesses up to 10 staff: [http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition\\_en](http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition_en). This definition has been retained for the purposes of this Plan.



#### **Parking Standards<sup>74</sup>**

- c) Deliver pedestrian, cycle and public transport connections to adjacent businesses, residential areas and public open spaces, to maximise integration with the surrounding locality<sup>75</sup>;**
- d) Allow for opportunities for future expansion in the medium/ longer term;**
- e) Not give rise to unacceptable impacts upon the amenity of adjoining business premises; and**
- f) Where necessary, include suitable structural landscaping, in recognition of its wider setting.**

#### **Protection of existing employment areas**

- 7.37 The outstanding new employment developments are anticipated to come forward during the remainder of the Plan period, predominantly at the major sites already committed, or allocated in the Joint Core Strategy. The focus should be to support the economic outcomes of the Plan; namely the implementation of these schemes to deliver a diverse range and quality of jobs and business opportunities through indigenous growth and inward investment so as to encourage enterprise and entrepreneurship along with opportunities for residents to work locally.
- 7.38 Nevertheless, the Plan should also recognise the role of the district's existing/ established employment base. The focus for this Plan ought therefore to be the identification, retention and consolidation of the area's existing/ established employment base. This is also emphasised in the Council's Economic Strategy, which identifies an important constraint to economic growth as the lack of available sites to support the expansion of existing businesses (paragraph 4.2.3).
- 7.39 The Joint Core Strategy already provides overarching policy criteria for safeguarding existing employment areas. This includes a requirement for: "*Safeguarding existing and committed employment sites for employment use unless it can be demonstrated by an applicant that there is no reasonable prospect of the site being used for that purpose*" (Policy 22(c)), as one aspect of delivering a strong sustainable economy. This Plan, as a site specific development plan document, ought to identify those industrial and commercial sites that should be designated as protected employment areas.
- 7.40 The 2019 Employment Land Review (ELR)<sup>76</sup> considered 44 established employment areas of greater than 1ha across the district. A further 8 smaller employment areas (i.e. less than 1ha) were also assessed. These vary greatly, between areas dominated by general industrial uses (e.g. Wellingborough Road, Rushden, and Kimbolton Road, Higham Ferrers); logistics sites (e.g. Islip Furnace; Warth Park, Raunds, and Haldens

---

<sup>74</sup> By way of example, the ENC Enterprise Centre at Michael Way, Raunds, has provided 114 spaces

<sup>75</sup> A Transport Assessment to assess these matters shall be submitted as part of as part of any planning application

<sup>76</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11259/190307\\_east\\_northants\\_elr\\_report\\_final](https://www.east-northamptonshire.gov.uk/downloads/file/11259/190307_east_northants_elr_report_final)

Parkway, Thrapston), or those dominated by the leisure or visitor economy, such as Rushden Lakes.

- 7.41 Of the 52 sites considered through the ELR, 19 are already designated as protected employment areas, by virtue of their status in other recently adopted development plan documents. Of these 19 sites, 8 Rushden sites (forming the Sander's Lodge/ Crown Park, Northampton Road/ Wellingborough Road employment area) are covered by a single designation in the Minerals and Waste Local Plan. This designation is also incorporated into the Rushden Neighbourhood Plan. The other 11 such areas are similarly designated through Neighbourhood Plans and this Plan should recognise this position.
- 7.42 Sander's Lodge (Rushden), Kimbolton Road (Higham Ferrers) and the Nene Valley Business Park (Oundle) employment areas are identified in the Minerals and Waste Local Plan as suitable locations for waste management facilities (Policy 13; site references WL19, WL20 and WL21, respectively). It is important to ensure that the adverse environmental impacts arising from waste management uses are minimised, through robust application of development management policies from the Minerals and Waste Local Plan and Joint Core Strategy (Policy 8), alongside associated licencing regimes. In addition, the acceptability and suitability of these sites can be looked at again when the Minerals and Waste Local Plan is reviewed.
- 7.43 The remaining 33 established employment areas were subject to more detailed assessment through the ELR. Of these, 31 areas were found to be worthy for retention, at least in the short/ medium term. Many of the assessed employment areas contain one or more "Top 40" businesses in East Northamptonshire, in terms of rateable value. This provides a strong indicator as to the relative value or importance of a site as part of the existing employment land portfolio.
- 7.44 Rushden Lakes also hosts a number of top 40 businesses, including Marks & Spencer and Next. This was not assessed for the ELR, as it is a recently implemented purpose built site. Instead, the ELR focuses upon analysing the quality and marketability of long established employment areas that may (in some cases) be coming to the end of their operational lives. Table 10 (below) shows the employment areas which host one or more of the top 40 businesses.

| <b>Table 10: Top 40 businesses</b> |                 |   |
|------------------------------------|-----------------|---|
| <b>Site name</b>                   | <b>Location</b> | <b>Top 40 businesses (measured by rateable value, as at 2018/19)</b>                      |
| Horizon Centre, Gretton Road       | Deene/ Corby    | Lloyds Bank plc   |
| Lakeside House, Bypass             | Higham Ferrers  | RPC Containers Ltd  |
| Whitworths, Wellingborough Road    | Irthlingborough | Whitworths Ltd  |
| Islip Furnace Site, Kettering Road | Islip           | Primark Stores Ltd; Dodson & Horrell Ltd  |
| East Road                          | Oundle          | Waitrose Ltd  |
| Nene Valley Business Park          | Oundle          | Fairline Yachts Ltd   |
| Warth Park                         | Raunds          | Howden Joinery Group Plc; Indesit Co UK Ltd; DSV Solutions Ltd; Exertis (UK) Ltd; Airwair |



| <b>Table 10: Top 40 businesses</b>                   |                 |   |
|--|-----------------|---|
| <b>Site name</b>                                     | <b>Location</b> | <b>Top 40 businesses (measured by rateable value, as at 2018/19)</b>  |
|  |                 | International Ltd;  |
| Crown Park/ Express Business Park/ Sanders Lodge etc | Rushden         | Waitrose Ltd; Belkin Ltd; Prism-DM Ltd  |
| Spire Road, John Clark Way                           | Rushden         | URBN UK Ltd; DHL Supply Chain Ltd   |
| Rushden Lakes  | Rushden         | Marks and Spencer Ltd; Primark Stores Ltd; H & M Hennes Mauritz UK Ltd; River Island Clothing Ltd                                     |
| Halden's Parkway                                     | Thrapston       | Primark Stores Ltd; WM Morrison Supermarkets plc; DSV Solutions Ltd; Saica Pack UK Ltd; Paperchase Products Ltd; Simplehuman (UK) Ltd |

- 7.45 The Aspinall Verdi study has stated that Whitworths has expressed a desire to retain its current premises at Irthlingborough for the medium/ long term. Previous proposals for comprehensive redevelopment of the site for housing and wholesale relocation of Whitworths' operation have been replaced by proposals for the release of part of the site for residential development; while concentrating the existing business on part of the site.
- 7.46 The designated employment protection areas (i.e. those that ought to be safeguarded) are shown on the Policies Map. Appendix 3 provides summary details for each site, with the Protected Employment Areas Background Paper (BP6)<sup>77</sup> setting out further details about how the Aspinall Verdi study has been applied in setting policy for protecting the established portfolio of employment sites. Policy EN16 (below) should be utilised in conjunction with Joint Core Strategy Policy 22(c) or relevant Neighbourhood Plan policies for the retention of existing employment areas. It is, however, recognised that certain changes of use are allowed under permitted development rights (General Permitted Development Order) and this Policy cannot protect against this.

### **Policy EN16: Protected Employment Areas**

**The existing employment sites, as shown on the Policies Map, are protected for employment use<sup>78</sup>. Proposals for re-development or changes of use of existing buildings should ensure that the overall provision of employment on the site is no less than that of the current or most recent use. A reduction net job numbers/employment land or development for non-employment uses can only be supported where it can be demonstrated that:**

- a) **There is no realistic prospect of the site or buildings being used or re-used, including redevelopment, for employment purposes<sup>79</sup>; and/or**

<sup>77</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12107/background\\_paper\\_6\\_-\\_protected\\_employment\\_areas](https://www.east-northamptonshire.gov.uk/downloads/file/12107/background_paper_6_-_protected_employment_areas)

<sup>78</sup> Appendix 2 sets out the differentiation between main town centre uses (as defined by national policy) and other employment uses

<sup>79</sup> In relation to criterion a) a suitable time period would be to sites being marketed for employment purposes for at least 12 months without success

- b) **Constraints associated with the site or buildings mean these would be unsuitable for re-use, in terms of siting, design, access, layout and relationship to neighbouring buildings and uses.**

### **Meeting development needs of business**

- 7.47 Enterprising East Northants emphasises the need to maintain a sufficient supply of deliverable land, to allow for existing businesses to expand. While the committed major employment sites are more than sufficient to fulfil the Joint Core Strategy target (7,200 jobs), it is important to recognise the ever-changing needs of existing and established businesses/ employers at both a local and strategic level. In the medium to long term these targets are likely to increase, largely due to additional growth aspirations arising from the Oxford Cambridge Arc.
- 7.48 The Economic Strategy also proposes an approach to ensure the release of suitable land, in and around existing employment areas. It advises that the provision of smaller parcels of land in sustainable locations or within larger, strategic sites can help to meet the needs of small and medium-sized businesses (SMEs) and identified growth sectors and support the expansion of existing businesses enabling their retention within the district. To this end, the Economic Strategy states that: “*The council will identify any suitable sites for additional employment during the development of the District (Part 2) Plan*” (paragraph 4.2.3).
- 7.49 To meet the requirements of the Economic Strategy, the series of stakeholder (Member and Town/ Parish Council) workshops (held during 2017-2018) included the collation of local information regarding specific sites where redevelopment or enhancement is deemed desirable, or where provision could be made to facilitate the expansion of established businesses. Where applicable, site specific policies for individual sites are included within the Town Centre Strategies (section 10.0).
- 7.50 It is considered important for this Plan to work towards creating the conditions in which businesses can invest, expand and adapt (NPPF paragraph 81). The Joint Core Strategy already specifies that economic prosperity will be delivered through prioritising the enhancement of existing employment sites and the regeneration of previously developed land (Policy 22(b)). This Plan will take this concept further, by explicitly recognising potential/ latent needs for established businesses to expand and grow.
- 7.51 The potential impacts of proposals for the expansion or relocation of existing business premises on the Upper Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the Special Protection Area SPD set out requirements for developments with the potential to have an adverse impact on the SPA. Development with the potential to cause an adverse effect on the SPA must meet the requirements of JCS Policy 4, or any subsequent replacement or update to that policy. A Habitats Regulations Assessment may be required to accompany any planning application to demonstrate the absence of any such adverse effect.

## Policy EN17: Relocation and/ or expansion of existing businesses

Proposals for the extension of existing business premises beyond their current curtilages or for businesses that need to relocate, will be supported where they meet the following criteria:

- a) Is adjacent to an existing built up area, and there is no significant impact on the countryside ecology, highways, the character of the surroundings or the amenity of neighbouring properties;
- b) For main town centre uses, if applicable, meets the requirements of the sequential and impact tests; and
- c) Provides maximum accessibility for the workforce by sustainable modes of transport such as walking, cycling and public transport.

### Town Centres

- 7.52 The Plan recognises the national policy distinction between main town centre employment uses and non-town centre uses. To fully address the economic and planning policy requirements of the district it is necessary to establish a comprehensive policy framework for main town centre uses.
- 7.53 Policy 12 of the Joint Core Strategy provides the overarching spatial approach to managing main town centre uses within the North Northamptonshire Context. This sets a two tier hierarchy of town centres:
- **Growth Towns (including Rushden town centre)** – Focus upon adaptation and diversification so that the town centre can continue to function in a complementary way to the Rushden Lakes development;
  - **Market Towns (including Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston town centres)** – Focus upon the role of Market Towns in providing mainly convenience shopping and local services.
- 7.54 The NPPF emphasises a “town centre first” approach for main town centre uses, whereby the national sequential and impact tests should be applied for main town centre uses that are beyond the defined town centres. This requirement is incorporated into the Joint Core Strategy (Policy 12(g)).

### Town centre boundaries and primary shopping areas

- 7.55 The NPPF (paragraph 86(b)) requires Local Plans to define the extent of town centres and primary shopping areas, setting policies to give direction as to what types of uses would be permitted in these locations. The Neighbourhood Plans for Higham Ferrers, Raunds and Rushden already set detailed policies for managing development within the respective town centres and primary shopping frontages (i.e. areas). Table 11 (below) identifies where current up to date Neighbourhood Plan policies are already in place and/ or where previous Local Plan designations are extant.

**Table 11 Town centre boundaries and primary shopping areas**

| Town Centre                          | Designated town centre boundary (since 2012 NPPF) | Designated primary shopping area/ frontage (since 2012 NPPF) | Development plan document/ policy reference and other information   |
|--------------------------------------|---|--|---|
| Higham Ferrers                       | ✓   | ✓  | Higham Ferrers Neighbourhood Plan 2011-2031, “made” (adopted) April 2016 (HF.TCE1)  |
| <i>Irthlingborough</i> <sup>80</sup> | X   | X  | <i>Primary shopping frontage designated through District Local Plan, adopted November 1996 (Policy S5). Pre-dates NPPF; therefore new town centre boundary has been designated and primary shopping frontage reviewed.</i>  |
| <i>Oundle</i>                        | X   | X  | <i>Town centre boundary and defined shopping frontage designated through RNOTP, adopted July 2011 (Policy 18). Pre-date NPPF; therefore town centre boundary and defined shopping frontage have been reviewed, but the previous Local Plan (RNOTP) designations have been retained.</i> |
| Raunds                               | X   | ✓  | Linear primary and secondary shopping areas defined through Raunds Neighbourhood Plan, made November 2017 (Policy R9/ Figure 6). Linear designations reflect the character of Raunds Town Centre i.e. the Neighbourhood Plan found this to be the most appropriate approach.            |
| Rushden                              | ✓   | ✓  | Town centre boundary (Policy R1) and defined shopping frontages (Policy R2) defined through Rushden Neighbourhood Plan, made June 2018  |
| <i>Thrapston</i>                     | X   | X  | <i>Town centre boundary and defined shopping frontage designated through RNOTP, adopted July 2011 (Policy 18). Pre-date NPPF; therefore town centre boundary and defined shopping frontage have been reviewed.</i>  |

<sup>80</sup> Town centre boundaries and primary shopping areas for Irthlingborough, Oundle and Thrapston (shown in *italics*) are defined/ designated through this Plan. In the cases of Higham Ferrers, Raunds and Rushden, these are already defined in the respective Neighbourhood Plans.

- 7.56 The Plan will focus upon defining town centre boundaries and primary shopping areas for Irthlingborough, Oundle and Thrapston i.e. those town centres whose designations pre-date the NPPF.
- 7.57 In the case of Oundle, the town centre boundary and primary shopping frontages were reviewed for the draft Neighbourhood Plan during 2017-18. The draft Neighbourhood Plan concluded that: *“The town centre area and primary shopping frontages have changed very little since the boundaries were defined in the Rural North, Oundle and Thrapston Plan and it is therefore the intention to retain these boundaries as defined on the Policies Map”*. This review therefore found that the previous Local Plan boundaries should be retained, although developments incorporating town centre uses at Oundle Wharf and East Road (Waitrose) since 2013 will have implications for the established town centre. Furthermore, earlier Local Plan town centre policies have been reviewed, in order to accord with Policy 12 of the Joint Core Strategy.
- 7.58 The town centre boundaries and defined shopping frontages for Irthlingborough and Thrapston have also been reviewed. This review was undertaken with reference to the series of Member and Town Council Workshops, held between November 2017 and April 2018, together with the latest town centre monitoring, undertaken in spring 2018. These two town centres were found to have the following characteristics:
- **Irthlingborough** – Linear town centre (High Street) between Market Cross (east) and Oliver Twist pub (west), with the new Coop development at Market Cross (Church Street) becoming the main focus for the town centre.
  - **Thrapston** – Linear town centre (High Street) between Oundle Road junction (east) and Cosy Nook/ Midland Road junction (west), but no defined central focal point.
- 7.59 This Plan sets out additional direction, over and above Policy 12 of the Joint Core Strategy, with reference to managing development within the existing town centres. While the Neighbourhood Plans for Higham Ferrers, Raunds and Rushden each set their own town centre development management policies, the Plan must address the requirements of other town centres which do not have Neighbourhood Plans in place.
- 7.60 The town centre boundaries are shown on the policies map. The town centre boundaries effectively function as the primary shopping areas reflecting the relatively small size of the town centres which do not have areas of predominantly leisure, business and town centre uses adjacent to the primary shopping frontages. For clarification, for the purpose of criterion a of Policy 12 of the JCS and for the consideration of edge of centre proposals in accordance with the NPPF, where town centres do not have a defined Primary Shopping Area, ‘edge of centre’ will for retail purposes be considered as within 300m from the town centre boundary.
- 7.61 Local regeneration strategies will be prepared for town centres to assist town centre regeneration. These strategies could range from comprehensive town centre masterplans to site specific development briefs and could also include Town Centre design codes.

## Policy EN18: Town centres and primary shopping frontages

Development within the town centre boundaries of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds<sup>81</sup> and Thrapston, as shown on the Policies Map will be supported where this will achieve vibrant and viable town centres. Development should deliver increased vitality, through all or where appropriate some of the following:

- a) At street level, maintaining a balance and mix of main town centre uses;
- b) Opportunities for a mixture of businesses, residential and live-work units, including at first floor level and above;
- c) Avoiding an over concentration of a particular town centre use with the exception of retailing;
- d) Retaining a predominantly retail offer for the defined primary frontages, as shown on the policies map;
- e) Enhancing the streetscape, to maximise opportunities for increased footfall;
- f) Improving the connectivity between High Streets, town centre car parking and the surrounding urban hinterland with a particular focus on cycling and walking; and
- g) Preparing local regeneration strategies to encourage the re-use of vacant and redundant premises for a balanced mix of uses, including where appropriate residential uses, to revitalise the character of the town centres.

### Managing the impacts of main town centre uses beyond the town centres

7.62 The NPPF requires the preparation of an impact assessment for retail, office and leisure uses beyond the town centres (paragraph 90), except where sites are allocated through a development plan (i.e. this Plan or a Neighbourhood Plan). The NPPF sets a default maximum 2,500m<sup>2</sup> threshold floorspace for these main town centre uses before an “impact test” is required but, where appropriate, allows for Local Plans to set a lower local threshold.

7.63 The Joint Core Strategy applies the national 2,500m<sup>2</sup> threshold (Policy 12(g)). This therefore provides an opportunity for this Plan to define a lower impact test threshold, provided that there is an evidence base to justify this. It is necessary to assess the implications of the default threshold, in order to understand what this represents in practice. In the case of retailing, consideration has been given to recent A1 retail developments that have been constructed throughout the district. Table 12 (below) identifies these recent schemes.

---

<sup>81</sup> In Raunds this applies to development within the Primary Shopping Area defined through the Neighbourhood Plan

| <b>Table 12: Recent convenience retail developments</b> |                 |   |
|---|-----------------|---|
| <b>Recent proposal or development scheme</b>            | <b>Location</b> | <b>Gross floorspace (m<sup>2</sup>)</b> |
| Aldi, Attley Way  | Irthlingborough | 1,254                                   |
| Former Express Works site, Church Street                | Irthlingborough | 930 (main store)                        |
| Waitrose, 66 East Road                                  | Oundle          | 2,203                                   |
| Asda, Warth Park  | Raunds          | 931                                     |
| Lidl, Newton Road                                       | Rushden         | 2,250                                   |
| Sainsbury's, 100 High Street South                      | Rushden         | 372                                     |

- 7.64 An assessment of town centre units undertaken by Raunds Town Council in 2015 indicated that a majority of retail units could be lost through the new permitted development rights (SI 596<sup>82</sup>) i.e. being less than 150m<sup>2</sup> ground floor (retail) floorspace. Setting a lower threshold should therefore be considered in the case of the six town centres.
- 7.65 Any impact test threshold should be set at an appropriate level. On the one hand, it is essential to ensure that future edge of centre, out of centre and out of town developments for main town centre uses could be tested for their impact upon the town centres. On the other hand, any such standards must be workable, especially in view of the need for Market Towns “to provide a strong service role for their local community and wider rural hinterland”, and (in the case of Rushden) provide “the focus for major co-ordinated regeneration and growth in employment, housing, retail and higher order facilities” (Joint Core Strategy, Table 1).
- 7.66 The Raunds based assessment revealed particular concerns about the loss of town centre retailing through the possible unchecked application of permitted development rights. In the case of convenience retailing (priority for the Market Towns) reference is also made to the recently opened Sainsbury's convenience store (out of centre) at 100 High Street, Rushden. This 372m<sup>2</sup> (gross) floorspace development (250m<sup>2</sup> net tradeable area) is closely related to the current “Sunday trading law” floorspace threshold; whereby Sunday opening times are restricted to 7 hours (stores greater than 280m<sup>2</sup> trading area<sup>83</sup>).
- 7.67 Evidence demonstrates the Market Towns (particularly Raunds, as is evidenced in objections from the Town Council in 2015 in connection with a number of applications to change small retail units in the town centre into residential use) are vulnerable to the loss of smaller retail units from primary shopping areas. This demonstrates that it is appropriate to set a 100m<sup>2</sup> threshold floorspace, for changes of use not covered by the 2015 General Permitted Development Order, recognising this sensitivity to the cumulative loss of smaller units (100-150m<sup>2</sup> floorspace). By contrast, it may be appropriate to apply a different threshold in the case of Rushden, acknowledging its Growth Towns status. Based upon the recent Sainsbury's case, the 280m<sup>2</sup> Sunday

<sup>82</sup> <https://www.legislation.gov.uk/uksi/2015/596/contents>

<sup>83</sup> The “Sunday trading law” threshold is recognised in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 757); which differentiates between convenience retailing (<280m<sup>2</sup> floorspace – Use Class F.2) and comparison/ larger convenience retailing (>1 unit and/ or 280m<sup>2</sup> floorspace – Use Class E)

trading threshold is considered appropriate for Rushden. Further analysis is provided in the Retail impact assessments threshold Background Paper (BP7)<sup>84</sup>.

### **Policy EN19: Impact test thresholds for retail development**

**Proposals for retail development outside the town centre boundaries of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds<sup>85</sup> and Thrapston, as shown on the policies map, should be supported by an appropriate impact assessment, where the following floorspace thresholds are exceeded:**

- a) Rushden Town Centre 280m<sup>2</sup>; and**
- b) Market Towns Centres 100m<sup>2</sup>.**

**Impact assessments and Sequential tests should be prepared in accordance with the relevant national guidance<sup>86</sup>. Failure to demonstrate there will be no significant adverse impact would result in a refusal of planning permission.**

### **Local Centres**

- 7.68 The Joint Core Strategy (Policy 12(g)) makes provision for the identification of further local centres, as appropriate. The NPPF requires that all development proposals for main town centre uses (e.g. retailing, restaurants, indoor leisure and entertainment, hotels, offices, cultural and tourism development) need to be subject to the sequential test, where these are not in an existing centre and not in accordance with an up to date Local Plan. The Council may need to develop a built sports facilities strategy in line with paragraph 93 of the NPPF, to set out a local approach to the development of leisure based main town centre uses, both in the town centres and local centres.
- 7.69 In the case of the six towns within East Northamptonshire, there may be circumstances where development proposals for uses such as neighbourhood convenience retailing, offices, pubs or other leisure facilities in out of centre locations would not meet the requirements of the national sequential test (NPPF paragraph 87 ). Whilst the NPPF exempts small scale retailing, community or office developments in rural areas from national requirements to undertake sequential and/ or impact tests, no similar national policy exemption exists for equivalent uses in out of centre locations within urban areas, although the updated Use Classes Order (September 2020) may go some way to overcome this issue.

### **What is a “local centre”?**

- 7.70 Groups or hubs of local services and facilities were identified through the series of Member and Town/ Parish Council workshops (2017/18). These have been assessed on the basis of the existing range of these uses focusing upon defined main town centre

---

<sup>84</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12108/background\\_paper\\_7\\_-\\_retail\\_impact\\_assessment\\_thresholds](https://www.east-northamptonshire.gov.uk/downloads/file/12108/background_paper_7_-_retail_impact_assessment_thresholds)

<sup>85</sup> In Raunds this applies to development outside the Primary Shopping Area defined through the Neighbourhood Plan

<sup>86</sup> The Planning Practice Guidance provides full details about the obligations for undertaking a main town centre uses impact assessment: “Ensuring the vitality of town centres”: <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>



uses, to establish whether any of these hubs could be considered to function as a local centre. A detailed site by site assessment is set out in the Local Centres Background Paper (BP8)<sup>87</sup>.

7.71 For the purposes of the Plan, the term “local centre” refers to those smaller scale hubs of predominantly main town centre uses, but which do not fulfil the NPPF criteria to be designated town centres in their own right. Typically, a local centre would contain most (if not all) of the following types of use:

- Convenience store;
- Post office;
- Financial services e.g. small bank or estate agency;
- Pub, entertainment or eating establishment;
- Community centre;
- Local leisure facility.

7.72 To be defined as a local centre, the range of facilities must typically function to serve the immediate neighbourhood i.e. no more than 1000m<sup>2</sup> floorspace (the standard threshold for major planning applications). Other out of centre or out of town hubs of main town centre uses (e.g. retail parks) which serve a wider area cannot be regarded as local centres, even where these attract the predominant quantum of footfall.

#### **Local centres within existing urban areas**

7.73 Local Centres are identified at Raunds and Rushden. The promotion or retention of local facilities is a fundamental aspect of providing for suitable mixed use developments and enhancing opportunities to promote health and social wellbeing at a neighbourhood level, in accordance with the Government’s own (NPPF) definition of sustainable development.

7.74 In the case of Rushden, the more peripheral residential parts of the urban area are up to 1.5km “as the crow flies” (2-2.5km travelling distance) distant from the town centre. This means that encouraging and supporting the development of neighbourhood hubs for appropriate “main town centre” uses could represent a vital assertion of sustainable development. The development of a local centre is a specific requirement for Rushden East (Joint Core Strategy, Policy 33).

7.75 The Joint Core Strategy (Policy 12) allows for the designation of local centres. Successful implementation of the overall strategy relies upon delivery of the sustainable urban extensions (including Rushden East). This mechanism is therefore proposed as a means to allow for a local standard to be applied in the case of smaller scale development schemes for main town centre uses which are proposed to serve a local neighbourhood.

7.76 The assessment process has found that the following locations fulfil the criteria for designation as local centres within the urban areas (site-specific maps for designated Local Centres are included at Appendix 4):

- **London Road/ Michael Way, Raunds** – Local centre;
- **High Street South, Rushden** – Linear local centre;

---

<sup>87</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12109/background\\_paper\\_8\\_-\\_defining\\_local\\_centres](https://www.east-northamptonshire.gov.uk/downloads/file/12109/background_paper_8_-_defining_local_centres)

- **Wellingborough Road, Rushden** – Linear local centre;
- **Grangeway shopping precinct, Rushden** – Local centre;
- **2-12 Blackfriars, Rushden** – Local centre; and
- **Rushden East** – Local centre(s), to be developed as part of SUE;

### Local centres at large villages

- 7.77 For main “town centre” uses within rural areas the NPPF applies specific exemptions i.e. small scale retailing, community or office developments in rural areas (paragraph 89). Nevertheless, this Plan (Table 5/ Policy EN1) proposes a differentiation between the eight large villages and other freestanding (small) villages.
- 7.78 Of the district’s eight large villages, Brigstock, Ringstead, Stanwick and Woodford all have nucleated hubs of local services and facilities (defined main town centre uses); namely convenience retailing/ post office, fast food takeaways, village hall/ social club and/ or pubs. These differ from the other large villages (Easton on the Hill, King’s Cliffe, Nassington and Warmington) that have equivalent provision of local services and facilities, but which are dispersed around the villages. Similarly, the small villages only tend to accommodate individual isolated local facilities; none are considered to host service hubs.
- 7.79 In determining development proposals around villages with clustered service locations, it may be appropriate to include reference to the proximity of development to these hubs as one such measure (test) for sustainability. The designation of local centres at Brigstock, Ringstead, Stanwick and Woodford (Appendix 4) should assist this aspect of decision making:
- **Hall Hill/ High Street, Brigstock** – Linear local centre;
  - **High Street, Ringstead** – Linear local centre;
  - **Church Street/ High Street, Stanwick** – Linear local centre; and
  - **High Street/ The Green, Woodford** – Linear local centre.
- 7.80 None of the relevant Neighbourhood Plans has opted to designate local centres. Therefore, Policy EN20 (below) provides a detailed Local Plan policy framework for the defined local centres.
- 7.81 The NPPF requires that all development schemes for defined main town centre uses, except those within existing town centres or allocated in an up to date development plan document, should be subject to the national sequential test requirements. In practice, the application of Policy EN20 would mean that main town centre uses within the defined thresholds would be exempt from the national sequential test requirements.
- 7.82 Class E of the Use Class Order provides significant flexibility in changes of use between main town centre uses. Policy EN20 seeks to support specific types of main town centre uses to reflect the role of these centres in serving the immediate local area. In some circumstances it may be necessary to remove permitted development rights to ensure that the local centres maintain their role in serving the needs of the immediate neighbourhood.

## **Policy EN20: Local centres**

Proposals of a scale and type limited to serving the immediate local area, which are adjoining or closely related to the designated local centres, as set out below and shown on the policies map, will be supported for, the following types of 'main town centre' uses:

- Convenience retailing;
- Financial services;
- Community facilities;
- Eating and drinking establishments; and
- Local leisure facilities.

**Designated Local Centres:**

- London Road/ Michael Way, Raunds
- High Street South, Rushden
- Wellingborough Road, Rushden
- Grangeway Shopping Precinct, Rushden
- 2-12 Blackfriars, Rushden
- Rushden East SUE
- Hall Hill/ High Street, Brigstock
- High Street, Ringstead
- Church Street/ High Street, Stanwick
- High Street/ The Green, Woodford

Such proposals will be supported, provided that they:

- a) Deliver an overall enhancement to the neighbourhood offer for 'day to day' local services;
- b) Improve connectivity for pedestrians and cyclists, between the designated local centre and the adjacent neighbourhood, where appropriate;
- c) Do not adversely affect local amenity, through providing an unacceptable impact through increasing antisocial behaviour, noise, smell or other impacts, and fulfil other relevant development management criteria within the Local Plan;

Permitted development rights may be removed where exceptional circumstances are considered to exist.

In large villages which do not have designated local centres sites that are proposed for 'main town centre' uses will be considered on their merits.

## 8.0 Housing Delivery

- 8.1 The Government, through the NPPF, emphasises the importance of providing a supply of housing required to meet the needs of present and future generations as a means to support strong, vibrant and healthy communities. Broadly, the plan process for managing housing delivery falls into two parts:
- Setting out housing requirements – ensuring that the Local Plan meets the identified housing need (both market and affordable housing); and
  - Allocation of housing land – Identifying a supply of specific achievable (i.e. deliverable or developable) housing sites for the entire Plan period (2011-2031).
- 8.2 The Joint Core Strategy sets the overall housing requirements for the district identifying the major strategic development sites, such as the Rushden East sustainable urban extension. This Plan will allocate housing sites to ensure the Council delivers, as a minimum, the overall strategic housing requirement for the district up to 2031.
- 8.3 This Plan will consider how the Local Plan housing requirements, as set out in Tables 4 and 5 of the Joint Core Strategy will be delivered throughout the district, as well as providing detailed policies relating to local housing need including housing mix and tenure, specialist housing needs, custom and self build. The Plan also provides indicative housing targets to assist parish and community groups in planning for future proposals through Neighbourhood Plans.
- 8.4 Paragraph 69 of the NPPF requires that land to accommodate at least 10% of the housing requirement is provided on sites no larger than 1 hectare. The Council meets this requirement, (evidence is contained within Background Paper 10 – Rural Housing Update July 2021).

### **Housing Requirements**

- 8.5 The Joint Core Strategy specifies a housing requirement of 8,400 dwellings for the Plan period (2011-2031). Table 5 sets out the required housing numbers that are expected to be delivered for each of the six towns, totalling 7,580 dwellings. It also sets out a generic district-wide rural target (820 dwellings).
- 8.6 The National Planning Policy Framework requires that, where appropriate, plans should set out the anticipated rate of development of specific sites. The Housing Trajectory is set out in Appendix 6. The Housing Trajectory demonstrates that the supply of sites available in the plan period will deliver homes in excess of the requirements identified in the Joint Core Strategy.

### **Urban Areas**

- 8.7 A number of significant development sites have already come forward (i.e. under construction or having extant planning permission) at each of the six towns (Rushden, Raunds, Irthlingborough, Thrapston, Higham Ferrers and Oundle) during the first 9 years of the Plan period (2011-2020). Alongside these, a large

number of smaller development sites have also come forward; these are included in the latest ( 2020) AMR Housing Site Schedule<sup>88</sup>.

- 8.8 At Raunds, development sites to the north, north-east and south of the town have progressed on the basis of the previous Local Plan (2008 Core Spatial Strategy) and are now under construction or mostly complete. Similarly, the Thrapston South urban extension (allocated in the previous Local Plan) is mostly complete (earlier development phases) or under construction (later development phases). Within the district three further major development sites are committed during the Plan period. Details about these sites are set out in Table 13, below.

| <b>Location</b> | <b>Site name</b>                            | <b>Total Capacity</b> | <b>No of units, 20-20-2031</b> | <b>Delivery beyond 2031</b> | <b>Development Plan Document</b>  | <b>Current status</b>                    | <b>Note</b> |
|-----------------|---|-----------------------|--------------------------------|-----------------------------|-----------------------------------|--|-------------|
| Rushden         | Rushden East                                | 2700                  | 1250                           | 1450                        | Local Plan (JCS Policy 33)        | New strategic site/ SUE                  |             |
| Higham Ferrers  | Land East of Ferrers School                 | 300                   | 300                            | 0                           | Higham Ferrers Neighbourhood Plan | Self contained strategic site allocation |             |
| Irthlingborough | West of Huxlow School/ Irthlingborough West | 700                   | 200                            | 500                         | N/a - Resolution to grant         | Strategic site/ SUE                      | JCS Annex A |
| <b>TOTAL</b>    | <b>Major urban extensions</b>               | <b>3700</b>           | <b>1750</b>                    | <b>1950</b>                 |                                   |  |             |

- 8.9 As at 1 April 2020, the outstanding housing requirement for the six urban areas has been calculated, by way of deducting the following elements for each town:

- Completions, 1 April 2011 – 31 March 2020;
- Commitments (i.e. extant planning permissions or previously allocated sites), as at 1 April 2020 (2020 AMR, Housing Site Schedule);
- Major development sites (Table 15, above) plus other emerging proposed development sites identified in the 2020 AMR Housing Site Schedule).

- 8.10 This approach provides a residual requirement for each of the six urban areas of the district. The residual balance from the 8,400 total requirement represents a net quantum of development for which the Plan will need to make provision (Table 14, below).

<sup>88</sup> Planning Policy Committee, 8 June 2020, Agenda Item 10, Appendix 3: [https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee)

| <b>Table 14:<br/>Urban areas<br/>residual<br/>housing<br/>requirement,<br/>as at 1 April<br/>2020</b> | <b>Housing requirement<br/>(2011-31)</b> | <b>Completions 2011-19</b> | <b>Completions 2018-20</b> | <b>% housing requirement<br/>delivered as at 31 March<br/>2020</b> | <b>Commitments (starts<br/>and planning<br/>permissions) as at 1<br/>April 2020</b> | <b>Commitments<br/>(resolutions to grant,<br/>Development Plan<br/>allocations, Rushden<br/>East) as at 1 April 2020</b> | <b>Residual requirement as<br/>at 1 April 2020<br/>(committed sites<br/>deducted)</b> |
|---|--|----------------------------|----------------------------|--|---|--|---|
| <b>Growth Town</b>  |  |                            |                            |  |   |  |   |
| Rushden   | 3,285                                    | -1036                      | -19                        | 32.1%  | -175  | -1515  | -540  |
| <b>Market Towns</b>   |  |                            |                            |  |   |  |   |
| Higham<br>Ferrers   | 560                                      | -370                       | -4                         | 66.8%  | 3   | 300  | -117  |
| Irthlingborough   | 1,350                                    | 320                        | 27                         | 25.7%  | 149   | 280  | -547  |
| Raunds  | 1,060                                    | 662                        | 47                         | 66.9%  | -347  | 0  | -4  |
| Thrapston   | 680                                      | 202                        | 223                        | 62.5%  | 260   | 0  | -5  |
| Oundle  | 645                                      | 392                        | 3                          | 61.2%  | 11  | 70   | 169   |
| <b>TOTAL</b>  | <b>7,580</b>                             | 2,982                      | 323                        | 43.6%  | 945   | 2,165  | 1,165   |

8.11 Table 14 shows that as at 1 April 2-20 JCS housing requirements for Higham Ferrers, and Thrapston are being met, through housing completions (799 dwellings) and housing commitments ( 563 dwellings). A minimal residual requirement has been identified for Raunds (4 dwellings), but other emerging and brownfield site proposals identified in the 2020 Annual Position Statement (total 88 dwellings) are more than sufficient to address the housing requirements for the town.

8.12 Outstanding residual housing requirements have been identified at Rushden (540 dwellings), Irthlingborough (574 dwellings) and Oundle (169 dwellings). Further detail about how these residual requirements will be addressed is set out at paragraphs 8.10-8.12, below. It is necessary, therefore, for this Plan to address the outstanding residual requirements for Rushden, Irthlingborough and Oundle. Further details about these outstanding requirements are set out in the (updated 2020) urban housing Background Paper (BP9)<sup>89</sup>.

### **Rushden**

8.13 For Rushden, commitments consist of extant planning permissions ( plus outstanding\_Neighbourhood Plan site allocations ( total 315 dwellings); with 1050 dwellings at Rushden East anticipated to be delivered by 2031. This equates to an outstanding requirement for 540 dwellings. A further 134 dwellings housing land supply is identified at specific unallocated brownfield sites within the urban area, equating to a residual requirement for 406 dwellings.

<sup>89</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12110/background\\_paper\\_9\\_-\\_housing\\_requirements\\_-\\_urban](https://www.east-northamptonshire.gov.uk/downloads/file/12110/background_paper_9_-_housing_requirements_-_urban)

## Irthlingborough

- 8.14 For Irthlingborough, commitments for 429 dwellings are identified within the 2020 housing land supply. A further 199 dwellings is included within the housing land supply, consisting of specific brownfield sites and other emerging sites which did not, as at 1 April 2020, have planning permission. These emerging sites reduce the residual requirement to 375 dwellings. Table 14 (above) shows the latest position for the Irthlingborough West urban extension; namely that the trajectory for this site has been set back until later during the Plan period, such that just 200 (out of 700) dwellings are now anticipated to come forward within the Plan period. While Irthlingborough West remains a commitment, it is expected that this site could only begin to deliver late in the Plan period.

## Oundle

- 8.15 A residual requirement for a further 169 dwellings at Oundle is identified, where additional strategic land allocations are required to meet this target. This residual figure for 169 dwellings at Oundle includes the previous Local Plan allocations at Ashton Road/ Herne Road Phase 2 (50 dwellings) and Dairy Farm (20 dwellings). If these sites are excluded, the Oundle residual requirement would rise to 239 dwellings<sup>90</sup>, as a minimum.

## Rural Areas

- 8.16 Table 5 of the Joint Core Strategy sets a district-wide rural housing requirement for 820 dwellings. This has implications for all rural parishes across the district. Table 15 (below) sets out a current position statement for the residual rural housing requirement, as at 1 April 2020.

| <b>Table 15: Rural areas residual housing requirement, as at 1 April 2020</b>                               | <b>District rural housing requirement 2011-31</b> |
|---|---|
| <b>JCS rural housing requirement 2011-31</b>  | <b>820</b>  |
| Rural housing completions 2011-19   | -513  |
| Rural housing completions 2019-20   | -65   |
| Extant planning permissions as at 1 April 2020_(as shown in 2020 AMR housing site schedule)                 | -124  |
| Local Plan/ Neighbourhood Plan site allocations (as at 1 April 2020)  | -136  |
| Emerging Neighbourhood Plan site allocations, other emerging rural sites (>4 dwellings), as at 1 April 2020 | -58   |
| <b>RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL 2020</b>  | <b>-76</b>  |

- 8.17 Table 15 demonstrates that the current Local Plan rural housing requirement for the district is already being met; indeed, exceeded by 76 dwellings. As specified in the Joint Core Strategy, further rural housing sites will continue to come forward through windfalls, infilling, Neighbourhood Plan allocations and rural exceptions

---

<sup>90</sup> As at 1 April 2017 (the latest available base date data when the first draft Plan was being prepared during 2018) the residual requirement was for 294 dwellings, which formed the basis for the 300 dwellings requirement. This figure reduced to 239 dwellings for the latest (2020) monitoring data.

schemes (Policy 11(2)). Further details about these outstanding requirements are set out in the (updated 2020) rural housing Background Paper (BP10)<sup>91</sup>.

### Setting Village Housing Requirements

- 8.18 The rural housing requirement is already delivered (578 dwellings), committed (260 dwellings); or allocations in Neighbourhood Plans “made” since 1 April 2020 and other emerging rural sites ( 58 dwellings). Nevertheless, Neighbourhood Planning groups have sought indicative Ward or Parish level housing “targets”, to provide a basis for allocating future housing sites in a Neighbourhood Plan. This issue is addressed in the updated NPPF (2021 update), which states that strategic policies should also set out a housing requirement for designated neighbourhood areas (paragraph 66) or, at the very least, provide an indicative figure if requested by the neighbourhood planning body (paragraph 67).
- 8.19 On the basis of this recent national policy change, it is necessary for the Plan to provide further local direction, in addition to the requirements stated in Table 5 of the Joint Core Strategy. This Plan will therefore set additional local direction in identifying an appropriate quantum of development for each village to meet a locally arising need, in accordance with policies 11(2)(a) and 29 of the Joint Core Strategy.
- 8.20 Using the total district rural population (20,260)<sup>92</sup>, a methodology of rural population apportionment may be applied to estimate indicative growth figures for individual parishes/ villages for the Plan period (Table 16, below). By this process (applying the 2011 Census i.e. population at the start of the Plan period), supported by local housing needs assessments, indicative quanta of development over the plan period are identified. It is emphasised that these are derived from the overall rural housing requirement (820 dwellings) and are not minima or set targets; rather, this is indicative guidance to support the preparation of Neighbourhood Plans. Table 16 sets out indicative figures for each rural Parish over the Plan period.

| <b>Population 2011 Census<sup>93</sup></b> | <b>Step increase in no of dwellings over 20 years</b> | <b>Range</b> | <b>Parishes/ Villages</b>  |
|--|---|--------------|--|
| <100                                       | 5   | 1-5          | Blatherwycke, Deene, Lilford cum Wigsthorpe, Luddington, Newton Bromswold, Pilton, Stoke Doyle, Thurning, Wakerley   |
| 100-249                                    | 10  | 6-10         | Fotheringhay, Deenethorpe, Cotterstock, Apethorpe, Bulwick, Tansor, Twywell, Southwick, Lutton, Sudborough, Ashton, Laxton, Harringworth, Hargrave, Wadenhoe |

<sup>91</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12111/background\\_paper\\_10\\_-\\_housing\\_requirements\\_-\\_rural](https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10_-_housing_requirements_-_rural)

<sup>92</sup> 2011 Census

<sup>93</sup> In some cases (e.g. Thorpe Achurch and Clopton), 2011 Census data was gathered at a multi-parish or ward level. This is reflected in Table 18, where Census data (corresponding to the start of the Plan period) has been applied to apportionment of the Joint Core Strategy rural housing requirement (820 dwellings).



| <b>Population 2011 Census<sup>93</sup></b> | <b>Step increase in no of dwellings over 20 years</b> | <b>Range</b> | <b>Parishes/ Villages</b>  |
|--|---|--------------|--|
| 250-499                                    | 20  | 11-20        | Hemington, Glapthorn, Duddington-with-Fineshade, Denford, Yarwell, Lowick & Slipton, Aldwincle, Great Addington, Little Addington, Benefield, Barnwell, Thorpe Achurch (with Clopton), Woodnewton, Polebrook |
| 500-749                                    | 30  | 21-30        | Collyweston, Chelveston cum Caldecott, Titchmarsh  |
| 750-999                                    | 40  | 31-40        | Nassington, Islip, Warmington  |
| 1000-1249                                  | 50  | 41-50        | Easton on the Hill, King's Cliffe  |
| 1250-1499                                  | 60  | 51-60        | Brigstock, Ringstead, Woodford   |
| 1500-1749                                  | 70  | 61-70        | n/a  |
| 1750-1999                                  | 80  | 71-80        | Stanwick   |

8.21 In many cases (in particular, King's Cliffe), these step increase/ range figures have been exceeded. In other cases (e.g. Chelveston cum Caldecott and Glapthorn), Neighbourhood Plans seek to deliver more housing than is set out in the indicative rural figures.

8.22 Notwithstanding, it is emphasised that the rural housing requirement (820 dwellings) has already been met; either by way of completions, existing commitments or Neighbourhood Plan site allocations. The role of these indicative figures is to inform the preparation of Neighbourhood Plans by setting out what would constitute an appropriate level of development for individual villages and/ or wards.

### **Strategic Housing Requirements**

#### **Oundle**

8.23 In assessing housing land requirements, each urban area has a specifically identified housing requirement. This requirement will need to be considered for each area where further housing sites would need to be allocated in the Plan. Policy 29 of the Joint Core Strategy (Distribution of New Homes) requires a minimum of 645 houses to be provided at Oundle over the Plan period up to 2031. To ensure Oundle meets this requirement, an outstanding requirement of approximately 300 new houses are to be provided through this Local Plan (Table 14 above refers).

8.24 Development contributions will be sought towards infrastructure requirements; highways, utilities (i.e. sewerage, water, power etc), healthcare, education, open space, affordable housing and any other requirements where appropriate. These obligations will be delivered in accordance with the relevant policy requirements throughout this and other adopted development plan documents.

8.25 Further, to ensure that the housing allocations proposed are brought forward to reduce the impact of development within the local area, the following development principles set out in the Oundle housing policies -will be expected to be addressed in addition to any specific requirements set out in each site allocation policy.

8.26 Detailed assessments were undertaken to inform the choice of sites. The Council published its own assessment of sites (November 2018<sup>94</sup>), together with a sustainability appraisal of strategic options for Oundle (AECOM, December 2018<sup>95</sup>) to inform the site selection process. This was followed by a more detailed reassessment of shortlisted sites (DLP Planning Ltd, July 2019<sup>96</sup>). Together these assessments provide a robust and systematic justification for the chosen site specific allocations.

8.27 Site specific requirements are set out at Policies EN21 to EN23, below.

#### **Land rear of Cemetery, Stoke Doyle Road, Oundle**

8.28 The land to the rear of the Cemetery, to the north of Stoke Doyle Road and west of Warren Bridge (south west of the existing urban area) was initially recognised as a potential longer term housing land allocation in the previous Local Plan (2011 Rural North, Oundle and Thrapston Plan). Its credentials as a deliverable housing land allocation were confirmed by the site assessments undertaken during 2018-19.

8.29 This site was chosen as it represents a logical extension to the existing urban area. Lyveden Brook forms the northern boundary; to the north of which is established residential development. Similarly, the site is bounded by residential development to the east (Warren Bridge) and the Cemetery to the south. However, there are a range of development constraints that would need to be overcome; in particular fluvial flood zones 2 and 3 (Lyveden Brooks) and highways limitations due to the narrow Warren Bridge (Stoke Doyle Road).

8.30 The site is located approximately 6.5km from the Upper Nene Valley Gravel Pits SPA, a specific wintering bird survey should therefore be undertaken for any planning application. The applicant will be required to provide evidence that the development will not result in a Likely Significant Effect. To achieve this, surveys will be required to determine habitats and current use of the site to determine if it does support a significant population of qualifying species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat. Surveys should be required to be undertaken during autumn, winter and spring and at more than 1 year of surveys may be needed (to be agreed in consultation with the local planning authority and Natural England). If habitat within the site is identified to support significant populations of designated bird features avoidance measures and mitigation will be required, such as the creation of replacement habitat nearby, and the planning application will likely need to be supported by a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity.

---

<sup>94</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11074/oundle\\_site\\_assessments](https://www.east-northamptonshire.gov.uk/downloads/file/11074/oundle_site_assessments)

<sup>95</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11075/oundle\\_strategic\\_options\\_assessment](https://www.east-northamptonshire.gov.uk/downloads/file/11075/oundle_strategic_options_assessment)

<sup>96</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability\\_assessment\\_of\\_potential\\_development\\_sites\\_in\\_oundle\\_july\\_2019](https://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potential_development_sites_in_oundle_july_2019)

**Figure 11: Land rear of Cemetery, Stoke Doyle Road, Oundle**



**Policy EN21: Land rear of Cemetery, Stoke Doyle Road, Oundle**

**Site Specifics**

Land at Stoke Doyle Road, as shown on the Policies Map and indicated above, is allocated for 3.5 ha. It is expected that the proposed allocation will deliver around 70 houses. Development should be delivered in accordance with the criteria below:

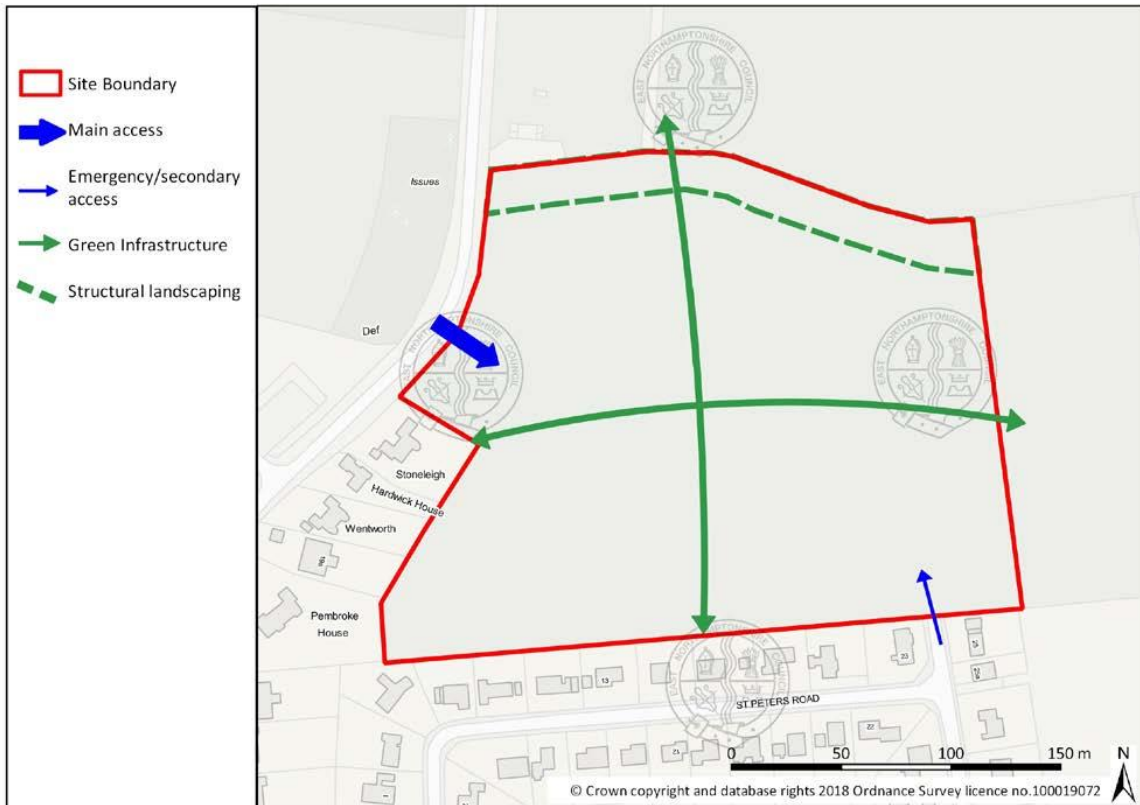
- a) This site is owned by two separate landowners but should be subject to a scheme that allows comprehensive development of the site.
- b) It will be expected to provide a housing mix which includes provision for older persons, on site affordable housing provision and 5% of plots should be made available as serviced building plots for self and/ or custom housebuilding.
- c) Upgrades to Stoke Doyle Road, including appropriate mitigation measures to address the impact of development upon the single track Warren Bridge, a significant heritage asset.
- d) Connections will be provided to the adjacent Public Rights of Way network, providing access to Benefield, Stoke Doyle and the town centre.
- e) Suitable structural landscaping will be provided to mitigate any potential adverse impacts of the development.

**The site will be required to set aside land to allow for an extension to Oundle Cemetery, as indicated in Figure 11 (above), in order to meet future requirements.**

### **Cotterstock Road/ St Peter's Road, Oundle**

- 8.31 Land to the east of Cotterstock Road (opposite the Primary School) and north of St Peter's Road (north of the existing urban area) was initially recognised as a potential longer term housing land allocation in the previous Local Plan (2011 Rural North, Oundle and Thrapston Plan). Its credentials as a deliverable housing land allocation were confirmed by the site assessments undertaken during 2018-19.
- 8.32 The site is bounded by built development to the west (Cotterstock Road), including residential development and the Church of England Primary School. To the south is St Peter's Road and the site has two potential accesses; off Cotterstock Road (to the west) and St Peter's Road (to the south). Outline planning permission to develop the site for up to 130 dwellings was granted in June 2020 (reference 19/01327/OUT).
- 8.33 Notwithstanding, previous consultations for the Local Plan (2018-19) and the subsequent planning application have revealed a number of issues that will need to be suitably addressed when implementing the consented scheme; e.g. drainage (both surface water and groundwater), access arrangements and potential odour issues from the sewage works to the north of the site. Detailed development proposals will need to address these matters and other site-specific constraints.
- 8.34 Notably, there is an existing foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert existing asset may be required.

**Figure 12: Cotterstock Road/ St Peter's Road, Oundle**



**Policy EN22: Cotterstock Road/ St Peter's Road, Oundle**

**Site Specifics**

Land at Cotterstock Road<sup>97</sup>, as shown on the Policies Map and indicated above, is allocated for 5.1 ha. It is expected that the proposed allocation will deliver around 130 houses. Development should be delivered in accordance with the criteria below.

- a) This site, which is within single ownership, will be expected to provide a housing mix which includes provision for older persons, on site affordable housing provision and 5% of plots should be made available as serviced building plots for self and/ or custom housebuilding, in line with other policy requirements.
- b) Enhanced connectivity; e.g. to the adjacent Public Rights of Way network, providing access to the Nene Valley and nearby villages (e.g. Cotterstock, Glapthorn and Tansor).
- c) Drainage will be managed by the provision of sustainable drainage systems (SuDS), including improvements to west/ east drainage capacity between Cotterstock Road and the River Nene to the east.
- d) Dwellings and residential gardens should be located at a suitable distance from Oundle Water Recycling Centre to ensure that there is no

<sup>97</sup> Approximately 50% of the gross site area (the northern part) is situated within Glapthorn Parish, although the whole site is regarded as meeting the strategic housing requirements for Oundle, comprising part of the Oundle urban area for the purposes of Local Plan monitoring

**unacceptable impact on residents and that any mitigation can be achieved without detriment to the continuous operation of Oundle Water Recycling Centre. Structural landscaping will also be provided for the site boundary, to mitigate the impacts of smell or other pollution (e.g. from the water recycling centre to the north).**

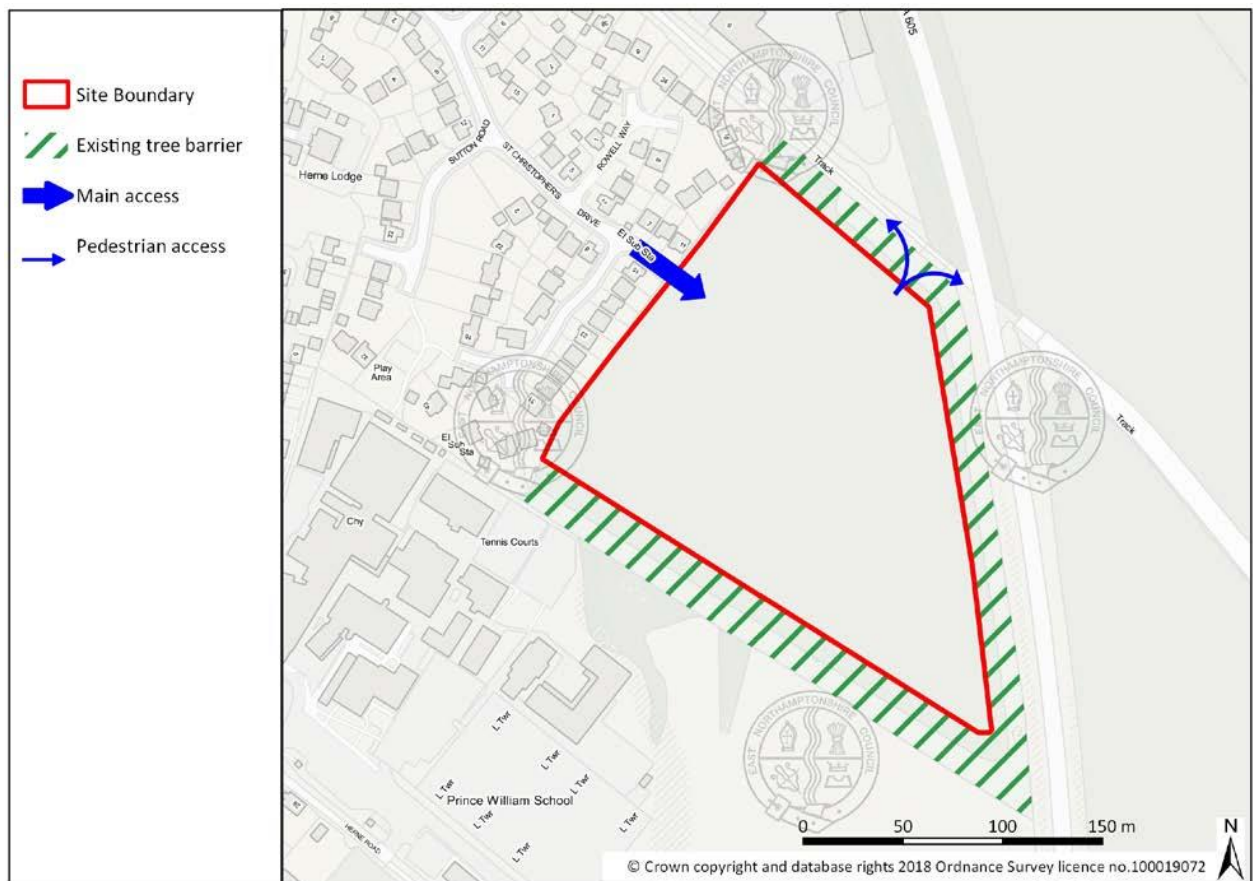
- e) Net biodiversity gains will be sought, by way of on-site and/ or off-site provision. These may include measures such as enhanced management of existing local wildlife sites such as the nearby Snipe Meadows local wildlife site.**
- f) The safeguarding of suitable access for the maintenance of foul drainage infrastructure.**

### **St Christopher's Drive, Oundle**

- 8.35 Land to the east of St Christopher's Drive and west of the A605 Bypass is a self contained greenfield site adjacent to the existing built up area. It is surrounded on three sides by a variety of land uses; residential (Ashton Road/ Sutton Road/ St Christopher's Drive estate) to the west; educational (Prince William School) to the south and employment (Nene Valley Business Park) to the north. The site is enclosed by the A605 Bypass, which forms the eastern boundary.
- 8.36 An outline application to develop the site for up to 65 dwellings and an extra care facility of up to 65 units was submitted in summer 2019 (reference 19/01355/OUT). This scheme was subject to detailed negotiations with the promoters around the development of extra care housing, for which Oundle has a particular acute need. The site was highlighted as suitable for extra care housing (see paragraph 8.75/ Policy EN27, below) due to its proximity to key town centre services such as convenience retailing, within 600m walking distance.
- 8.37 In June 2020 outline permission was granted for the application scheme (totalling 130 units), subject to S106. A significant element of the S106 negotiations relates to securing a robust legal mechanism to ensure delivery of the extra care element of the scheme, in lieu of affordable housing obligations. In the event that the extra care scheme does not prove to be deliverable, then the legal agreement should allow for this to be replaced by conventional affordable housing; to deliver the Joint Core Strategy requirement to provide for 40% affordable housing (Policy 30).
- 8.38 Previous consultations for the Local Plan (2018-19) and the subsequent planning application have revealed a number of issues that will need to be suitably addressed when implementing the consented scheme. Notable matters that need to be overcome include noise and air pollution from the adjacent Oundle Bypass, together with access arrangements for emergency vehicles. Therefore, it is necessary for this Plan to set a policy framework for managing the detailed development proposals.



**Figure 13: St Christopher's Drive, Oundle**



**Policy EN23: St Christopher's Drive, Oundle**

**Site Specifics**

**Land at St Christopher's Drive, as shown on the Policies Map and indicated above, is allocated for 3.9 ha. It is expected that the proposed allocation will deliver around 100 houses. Development should be delivered in accordance with the criteria below:**

- a) This site, which is within single ownership, will be expected to provide a housing mix to meet identified local needs and 5% of plots should be made available as serviced building plots for self and/ or custom housebuilding, in line with other policy requirements.**
- b) The site is well placed to deliver specialist housing, particularly extra care provision. Provision of such housing should be in lieu of the normal requirement for affordable housing; otherwise affordable housing should be delivered in accordance with normal policy requirements.**
- c) The road layout should be delivered in accordance with the Local Highway Authority's standards, supported by an appropriate Transport Assessment, with the main vehicular access forming a continuation of St Christopher's Drive.**
- d) Connections will be provided to the adjacent Public Rights of Way network, providing access to the Nene Way and adjacent villages (e.g.**

**Ashton, Barnwell and Polebrook).**

- e) **Structural landscaping will be provided for the site boundary, to mitigate the impacts of noise and other pollution from the A605.**
- f) **The design and layout should consider the proximity of the foul pumping station<sup>98</sup>. to reduce the risk of nuisance/ loss of amenity associated with the operation of this.**

**Additional housing requirements – Rushden and Irthlingborough**

- 8.39 The Joint Core Strategy (Policies 11 and 33) emphasises that the focus for this Plan should be to work with key stakeholders to secure the delivery of priority strategic sites, particularly those at Irthlingborough West and Rushden East. The delivery trajectories set out in the Joint Core Strategy (Annex 1) are as follows:
- Irthlingborough West – 700 dwellings, 2019-2030; and
  - Rushden East – 1,600 dwellings, 2020-2031.
- 8.40 The trajectories for the major strategic sites (sustainable urban extensions) have been reviewed yearly, through subsequent Authorities' Monitoring Reports (AMRs). Since adoption of the Joint Core Strategy (July 2016) the trajectories for Irthlingborough West and Rushden East have been substantially reviewed, in response to the latest deliverability evidence. The 2020 AMR<sup>99</sup>, indicates the following:
- Irthlingborough West –200 dwellings, 2027-2031; and
  - Rushden East – 1050 dwellings, 2023-2031.
- 8.41 The April 2020 trajectories for the two sustainable urban extensions equate to a combined reduction of 1050 dwellings for Irthlingborough and Rushden within the Plan period. Predominantly this is due to development viability affecting housing delivery of these two sites; in particular costs associated with ground stability mitigation for Irthlingborough West arising from the former mine workings. The revised trajectories equate to residual shortfalls of 375 dwellings and 406 dwellings, for Irthlingborough and Rushden respectively.
- 8.42 The NPPF requires the Council to maintain a rolling supply of specific deliverable sites (paragraph 68). Challenges around development viability impacting on delivering major sustainable urban extensions was the subject of detailed discussion held during the 2015 Examination for the Joint Core Strategy. However, the Inspector concluded that, the overall urban-focused spatial development strategy concentrating "*on existing towns and a series of deliverable SUEs represents the most suitable and sustainable strategy for the area over the*

---

<sup>98</sup> Anglian Water requires a minimum distance of 15 metres between the Oundle-Ashton Gate Terminal Pumping Station (OUNASM), which is located within the boundary of the allocation site, and the curtilage boundaries of the nearest dwellings.

<sup>99</sup> <http://www.nnjpdu.org.uk/publications/amr-2018-19-assessment-of-housing-land-supply-2019-24/>  
<http://www.nnjpdu.org.uk/publications/north-northamptonshire-authorities-monitoring-report-19-20/>



*plan period*" (paragraph 91, Joint Core Strategy Inspector's Report, 22 June 2016<sup>100</sup>).

- 8.43 The Local Plan housing requirements for Irthlingborough and Rushden (Joint Core Strategy Policy 29/ Table 5) represent minimum housing delivery figures and the Joint Core Strategy (paragraph 9.10) allows for the Local Plan Part 2 to assess higher levels of housing provision at individual settlements, or in locations where this would meet a shortfall in deliverable sites at another settlement within the southern part of the Plan area, which includes Irthlingborough and Rushden. In other words, the Joint Core Strategy allows for the allocation of additional housing land to meet any outstanding residual requirements for Irthlingborough and Rushden (totalling 781 dwellings, as at 1 April 2020).
- 8.44 The combined shortfall for Irthlingborough and Rushden equates to greater than 700 dwellings. This significantly exceeds the definition of a "strategic" housing requirement, (500 dwellings) as defined in the Joint Core Strategy (Figure 12: Key Diagram/ paragraph 9.14). However, regard should also be given to the housing land supply figures for Higham Ferrers, which currently exceed the Joint Core Strategy requirement by 247 dwellings (principally due to additional brownfield development opportunities within the urban area) and Raunds which exceed the requirement by 84 dwellings. If the Higham Ferrers and Raunds figures are applied to offset the Irthlingborough and Rushden shortfall, this would give a residual requirement for 450 dwellings across the four urban areas.
- 8.45 The Local Plan Part 2 has considered a number of possible further directions for growth around Irthlingborough and Rushden. The following locations at Irthlingborough and Rushden (lying within the East Northamptonshire area) were assessed:
- North of the A6, Irthlingborough;
  - North and East of Crow Hill, Irthlingborough;
  - East of Higham Ferrers;
  - South East of Rushden; and
  - West of Rushden Lakes.
- 8.46 An assessment of these potential locations was undertaken in autumn 2019<sup>101</sup>. This recommended that a site allocation for mixed use development to the west of Rushden Lakes was the most appropriate option, due its access to services and facilities (e.g. Rushden Lakes, the Greenway and Stanton Cross), and to support the implementation of consented new infrastructure including the Ditchford Lane/ Rushden Lakes link road.
- 8.47 This site assessment was endorsed by the Planning Policy Committee (17 December 2019). This was followed by a 6-weeks consultation (February – March 2020) proposing the allocation of a new mixed use development of up to 450 dwellings on land identified at Rushden Lakes West. Due to the proximity of the

---

<sup>100</sup> <http://www.nnjpdu.org.uk/publications/north-northamptonshire-joint-core-strategy-inspectors-report-22nd-june-2016/>

<sup>101</sup> Planning Policy Committee, 17<sup>th</sup> December 2019, Item 6: [https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning_policy_committee)

site to the Upper Nene Valley Gravel Pits SPA/ Ramsar site, the policy proposal highlighted a need for appropriate mitigation measures, to the satisfaction of Natural England, to avoid significant adverse impacts upon the integrity of the adjacent SPA/ Ramsar site. However, in its response to the consultation Natural England submitted a written objection to the proposal. Whilst additional work has been undertaken to provide appropriate mitigation measures (including restricting the site area and reducing its capacity) the objection remains.

- 8.48 As part of the requirements to address the objection submitted by Natural England's the Council has undertaken a more detailed assessment of viable alternative site options (previous work was informed by broad site locations) around the designated Growth Town of Rushden.

### **Rushden South East: Land east of the A6/ Bedford Road – alternative site specific proposal**

- 8.49 A site assessment was undertaken (September 2020<sup>102</sup>), to consider alternative site specific proposals to Rushden Lakes West, capable of accommodating up to 450 dwellings. This considered land east of Higham Ferrers (at Slater's Lodge, a potential northern development phase for Rushden East), and three potential site allocations to the south east of Rushden (south of Newton Road and east of the A6 Bypass).
- 8.50 This more detailed site assessment process identified land east of the A6 / Bedford Road as a viable alternative to Rushden Lakes West. This site was identified as having a number of positive attributes, namely:
- Opportunities for connectivity to the existing urban area (via Bedford Road/ High Street South) and surrounding services and facilities;
  - Single ownership;
  - Active promotion by landowner/ partner housebuilder;
  - Potential to provide new access from Bedford Road roundabout, with a 40mph limit already in force;
  - Deliverable independently of Rushden East sustainable urban extension;
  - No known constraints; and
  - The potential to integrate the proposed sports hub with the urban area.
- 8.51 The Policy (below) sets out the development principles and requirement for the development of land east to the east of the A6 / Bedford Road; a deliverable and achievable alternative to Rushden Lakes West.
- 8.52 The site is located approximately 3.5km from the Upper Nene Valley Gravel Pits SPA, it is therefore possible it could constitute functionally linked habitat for the SPA. The applicant will be required to provide evidence that the development will not result in an adverse effect on the integrity of Upper Nene Valley Gravel Pits SPA/Ramsar. To achieve this, surveys will be required to determine habitats and current use of the site to determine if it does support a significant population<sup>103</sup> of

---

<sup>102</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11974/background\\_paper\\_-\\_assessment\\_of\\_alternative\\_site\\_options](https://www.east-northamptonshire.gov.uk/downloads/file/11974/background_paper_-_assessment_of_alternative_site_options)

<sup>103</sup> A significant proportion is classified as a site that is regularly used by more than 1% of the population of the qualifying bird species

qualifying species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat. Surveys should be required to be undertaken during autumn, winter and spring and more than 1 year of surveys may be needed (to be agreed in consultation with the local planning authority and Natural England). If habitat within the site is identified to support significant populations of designated bird features avoidance measures and mitigation will be required, such as the creation of replacement habitat nearby, and the planning application will likely need to be supported by a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity’.

**Figure 14: Land east of the A6/ Bedford Road, Rushden (South East Rushden)**



## **Policy EN24: Land east of the A6/ Bedford Road, Rushden**

Land to the east of the A6/Bedford Road, Rushden, as shown on the Policies Map and indicated in Figure 14 above, is allocated for residential development together with associated supporting infrastructure, which should include a mix of ancillary retail, business or community uses to support the proposal.

A design led masterplan is to be agreed by the local planning authority as part of the application process, which will address all relevant policy requirements. The key principles of the proposed development will deliver the following:

- a) It is expected that the proposed allocation will deliver around 450 dwellings;
- b) A housing mix which includes provision for both specialist and older persons housing, and on-site affordable housing (meeting the target of 30% of the total number of dwellings provided within a Growth Town);
- c) Vehicular access to be provided directly from the Bedford Road/ A6 Bypass roundabout, with the proposals informed by a Transport Assessment subject to approval by the Highway Authority;
- d) To maximise opportunities to improve connectivity to, and enhance the quality of, the public rights of way network; in particular:
  - providing pedestrian and cycle connections to the surrounding urban area, and to adjacent sports and recreational facilities;
  - improving local bus connections serving the site;
  - delivering enhancements to the Rushden – Souldrop local green infrastructure corridor and net biodiversity gain; and
  - delivering facilities to assist the sustainability of the allocation , in particular by supporting the creation of a community hub to enhance the relocation of the sports facilities, to be located on the eastern edge of the site boundary.
- e) Appropriate mitigation measures, to avoid significant adverse impacts upon the integrity of the Upper Nene Gravel Pits Special Protection Area;
- f) Provision of a landmark feature at the main access point, adjacent to the A6 / Bedford Road roundabout; and
- g) Appropriate multi-functional structural landscaping to service the development, including sustainable drainage systems (SuDS) and suitable features along the western boundary to provide the necessary mitigation for noise and air pollution arising from the A6 Bypass.

### **Housing Mix and Tenure**

8.53 The NPPF requires that a sufficient amount and variety of land should be brought forward through the Local Plan to address the needs of groups with specific housing requirements (paragraph 59), and that the size, type and tenure of

housing needed for different groups of the community should be assessed and reflected in planning policy (paragraph 61), in order to create inclusive and mixed communities.

### **Wheelchair accessible housing**

- 8.54 The Joint Core Strategy (Policy 30) sets out the strategic approach to providing for a mix of dwelling sizes and tenures in order to meet the needs of the wider community. The policy sets out targets for affordable housing provision and highlights the need to provide for specialist forms of housing, particularly those relevant to older persons. It builds on the requirements set out in the NPPF that support strong, vibrant and healthy communities by providing a sufficient number and range of houses to meet the needs of both present and future generations, as well as requiring new development to meet national space and accessibility standards (Category 2 as a minimum). Policy 30 also provides for LPAs to set the proportion of Category 3a (wheelchair adaptable ) or Category 3b (wheelchair accessible) housing based on evidence of local needs, with Policy EN25 below setting a District-wide standard.

### **Policy EN25: Delivering wheelchair accessible housing**

**To help meet current and future needs for housing for people with disabilities, all new housing developments of 20 or more dwellings should include a target of 5% Category 3 (wheelchair accessible or adaptable) housing. Wheelchair accessible housing will only be required for dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.**

### **Strategic Housing Market Assessment**

- 8.55 The Joint Core Strategy provides extensive policy direction for the provision of affordable housing within the district. The Council will utilise Policy 30 to negotiate its affordable housing provision based on local evidence of need and scheme viability. The Council also welcomes the provision of low cost home ownership initiatives, in addition to meeting the affordable housing requirements.
- 8.56 This Plan seeks to provide additional policy direction to help address local housing needs/ demands across East Northamptonshire. Policy 30 of the Joint Core Strategy is based on the 2012 Strategic Housing Market Assessment (SHMA) and subsequent updates (to 2015), which analyses demographic and housing data to project the need for future housing requirements across the area. It provides the basis for developers, housing providers and local planning authorities to identify the mix of housing that is required to help create a balanced housing market, and set policies to this effect.
- 8.57 The 2015 update to the SHMA<sup>104</sup> provides an interactive toolkit to enable household requirements to be remodelled or updated based on new information being received. Whilst Policy 30 provides a strategic approach to providing for an appropriate mix of housing, detailed negotiations with site promoters will be based

---

<sup>104</sup> <http://www.nnjpdu.org.uk/publications/strategic-housing-market-assessment-update-january-2015/>



on the latest evidence together with further appropriate studies. The locally specific policies contained in this section of the Plan are informed by evidence bases and other evidence of housing need, which is referred to in relation to the particular policy itself.

- 8.58 In addition to the above it is important to take into account the Council's aspirations not just in recognising its pro active approach to delivering future housing growth above the strategic requirements, but also in driving up the value of the district, building on its desire to attract improved and higher quality job opportunities as well as ensuring an element of future housing delivery seeks to reflect that change by providing the ability to deliver high quality homes.

### **Informing East Northamptonshire's Housing Mix**

- 8.59 Requirements for new homes are based on the identified need to address existing deficits between the housing supply and local need and demand, as identified through the SHMA. The Plan will aim to further inform local imbalances in housing provision by seeking to provide a balance and mix of housing that recognise the requirements of those inadequately housed and the aspirational requirements of demand.
- 8.60 The Joint Core Strategy (paragraph 9.26) indicates that the demographic evidence of need does not take into account the aspirations of many households to have a spare bedroom, to provide for additional useable space for a number of reasons. Further, the Joint Core Strategy supports the opportunity to provide for a higher proportion of larger (4-bedroom) dwellings, where local evidence is provided in relation to the housing market stock and the local housing need.
- 8.61 In addition to providing flexibility to accommodate demand for larger dwellings, Policy 30 requires that account be taken of the composition of the existing dwelling stock. The aim is to ensure a balanced dwelling stock is provided in a particular neighbourhood or ward, where local evidence supports this approach.
- 8.62 The Council has sought additional evidence to better understand and inform a local approach to setting out its housing mix, through commissioning a report by Housing Vision – Informing East Northamptonshire's Housing Mix – Evidence to support Planning for Larger Residential Properties (June 2017)<sup>105</sup>. This study has found significant spatial differences in housing needs. In the rural north there is a general need for smaller houses, while in the south the need is predominantly for larger properties<sup>106</sup>.
- 8.63 The report concludes that there is some opportunity to develop larger and higher value housing options, and that an exclusive focus on the supply of smaller dwellings to meet population growth and the needs of new households may not be the most appropriate solution to meeting future housing need. For example, more sophistication is found to be required to meet aspirational demand and to enable a

---

<sup>105</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/10894/informing\\_east\\_northamptonshires\\_housing\\_mix\\_evidence\\_to\\_support\\_planning\\_for\\_large\\_residential\\_properties\\_final\\_report](https://www.east-northamptonshire.gov.uk/downloads/file/10894/informing_east_northamptonshires_housing_mix_evidence_to_support_planning_for_large_residential_properties_final_report)

<sup>106</sup> The Joint Core Strategy (Policy 30(a)) defines small and medium dwellings as 1-3 bedrooms, and large dwellings as 4 or more bedrooms

wide range of housing options, including options for older households looking to downsize within the district, along with providing choices which might appeal to those with high incomes. East Northamptonshire is facing significant demographic change through increased growth in the number of older households, which will continue to be a key driver throughout the Plan period. The implications relate to the need and demand for suitable housing options ranging from quality properties to attract down sizing, to the need for accommodation with high levels of support and care.

- 8.64 The report concludes that there is some opportunity to develop larger and higher value housing options, and that an exclusive focus on the supply of smaller dwellings to meet population growth and the needs of new households may not be the most appropriate solution to meeting future housing need. For example, more sophistication is found to be required to meet aspirational demand and to enable a wide range of housing options to reflect the Council's aspirations as reflected above.
- 8.65 Aspirational housing should be considered in relation to the geography of the district; i.e. the need for larger properties is in the urban areas in the south of the district and not in the north, compared to the more rural areas where the need is for predominantly smaller and affordable properties. Defining an appropriate housing mix should be considered as part of the wider viability testing for delivering a policy compliant scheme.
- 8.66 In addition the Council has an increasing number of older persons households. The Housing Vision report recognised the opportunity to address opportunities through the Local Plan to provide high quality smaller housing provision across the district as part of the Council's housing mix, to enable older person households looking to downsize and to help free up larger properties as a consequence.

#### **Policy EN26: Housing mix and tenure to meet local need**

**All housing developments will be expected to provide a suitable mix and range of housing, including a range of size, type and tenure (as set out in Policy 30 of the Joint Core Strategy) that recognise the local need and demand in both the market and affordable housing sectors, unless viability testing shows otherwise. Evidence should be provided to support the proposed housing mix.**

**In particular consideration will be given to:**

- a) Meeting the needs of an ageing population by providing the opportunity for smaller properties to encourage downsizing within the district;**
- b) Recognising the potential to increase the proportion of higher value, larger properties in areas where local evidence identifies a lack of opportunity for higher income earners to acquire such properties; and**
- c) Increasing the numbers of smaller dwellings in the rural areas to meet the needs for starter homes, affordable housing and downsizing.**

## Specialist and Older Persons Housing Provision

- 8.67 One of the most pressing issues facing North Northamptonshire over the next 20 years is the growth in older person (65+ years) households. The North Northamptonshire SHMA (2015 toolkit update) estimates the need for growth of around 20,100 specialist housing units to meet community need between 2011-2031; with the largest growth forecast within East Northamptonshire district. Here 79% of future household provision (compared with a figure of 60% across the sub region) is identified.
- 8.68 Supported housing – for older persons requiring a greater range of facilities than retirement housing – can include extra care housing. Extra care units provide self-contained accommodation, but with support and care services available on site. Three main types of provision are identified as follows:
- **Retirement housing** – provides some additional features including communal areas, often referred to as “sheltered housing” in the affordable sector and “retirement living” in the private sector, which may include a scheme manager based on site.
  - **Supported housing** – for older persons requiring a greater range of facilities than retirement housing, with support and care services available, and which includes extra care housing. Each household has self-contained accommodation.
  - **Retirement villages** – larger schemes of accommodation with a central hub providing a range of facilities, which can include registered care home accommodation. This type of provision is usually developed close to existing centres of population.
- 8.69 In addition to the above, whilst not recognised as specialist housing, both residential and nursing homes can also provide care and/ or nursing requirements for people whose care or health needs mean that they cannot live independently.
- 8.70 The 2015 toolkit update projects the number of older households requiring specialist housing in East Northamptonshire as 985 dwellings over the Plan period (up to 2031), which equates to 49 per annum. Table 17 below refers:

**Table 17: East Northamptonshire: Projected housing requirements for older persons 2011-2031 (SHMA update 2015)**

| 65+ households        | 65+ totals | Under occupying | Designated | Sheltered | Extra care |
|-----------------------|------------|-----------------|------------|-----------|------------|
| Additional households | 6,656      | 4,125           | 419        | 200       | 366        |

- 8.71 More recent information, commissioned by the Northamptonshire Councils along with the Clinical Commissioning Groups (CCGs) is reported through the Study of Housing and Support Needs of Older People across Northamptonshire (March



2017<sup>107</sup>) undertaken by the consultants Three Dragons. Using the Retirement Housing Group (RHG) model, which assumes that 15% of people over 75 and 2.5% of people aged 65-74, would move to retirement housing if it was available. The study identifies the future requirement for retirement housing in East Northamptonshire as an annual target figure of 103 dwellings per annum up to 2031.

- 8.72 Subsequent Sheffield Hallam University research still concentrates on the needs of people of 75 and over as they are the most likely to require specialist housing, but identifies even higher needs than the Three Dragons study. It is the preferred model of Northamptonshire County Council as it provides a more detailed analysis of data and allows for local adjustments such as urban/rural factors and the prevalence of dementia. It identifies an annual requirement of 598 units per annum across North Northamptonshire and an increasing shortfall in specialist housing for older people, estimated in East Northamptonshire as 207 units in 2017, rising to 387 in 2020 and 2,267 by 2035 as can be seen in Table 18, below.

| <b>Table 18</b>      | <b>Specialist older person's housing shortfall (East Northamptonshire)</b> |      |        |        |        |
|----------------------|--|------|--------|--------|--------|
| Year                 | 2017   | 2020 | 2025   | 2030   | 2035   |
| Cumulative shortfall | -207   | -387 | -1,202 | -1,756 | -2,267 |

- 8.73 Specialised housing services for older person provision vary between tenures, types of accommodation and providers, with individual care needs supported in different ways, therefore a variety of care needs should be addressed across the Plan period. In addition a shortfall in care home provision has been identified within the County as a whole, along with the need for more specialist care to be provided to meet dementia patient requirements. Going forward, new care and nursing home provision in specific locations will need to be supported by North Northamptonshire Council's Social Care and Health Team.
- 8.74 The Joint Core Strategy (Policy 30) encourages Sustainable Urban Extensions (SUEs) and other strategic developments to make specific provision towards meeting the needs of specialist housing requirements for older persons, including designated sheltered and extra care accommodation. The strategy also recognises the role that SUEs can provide in meeting the needs of the older person requirement, but expresses caution of the ability to meet these needs in the earlier phases of development, advising that sites should be reserved for future provision through the masterplanning process and that it may be appropriate, initially, to look at additional locations that have better established access to local facilities.
- 8.75 To this end, the new housing site allocations at Oundle (Policies EN21-EN23) are all required to make provision for older persons households, with the St Christopher's Drive site (EN23) being particularly suitable due to its location in

<sup>107</sup> <https://www.northamptonshire.gov.uk/councilservices/adult-social-care/policies/Documents/Study%20of%20Housing%20and%20Support%20Needs%20of%20Older%20People%20Across%20Northamptonshire.pdf>

close proximity to key services in the town. The Higham Ferrers site, East of Ferrers School (300 dwellings), should also provide a proportion of housing for older people. Sites in Rushden and Irthlingborough (the SUEs) also need to be identified to contribute to the provision of older persons housing.

- 8.76 Locations around the district's Growth and Market Towns (as identified in Table 5 of the Joint Core Strategy) offering a more sustainable location in relation to accessing local facilities and services will provide the most suitable opportunity to meet retirement and extra care provision in the short term. These will therefore be encouraged, together with the provision and safeguarding of sites at the SUEs and strategic sites.
- 8.77 Policy EN27 (below) sets thresholds to allow a proportion of housing to meet older person provision on development proposals to be negotiated. Provision could be made for age restricted accommodation, sheltered or extra care schemes, with the expectation that proposals will be designed to meet the Building Regulations Category 3 accessibility standards, or through the provision of bungalow style development.
- 8.78 This could include:
- Accommodation to enable downsizing such as bungalows, apartments and other smaller homes which are available to meet general needs but are particularly suitable to encourage and facilitate older people to move from larger family housing to smaller properties
  - Retirement Housing which will include also bungalows as well as other high quality homes which may be 'age restricted' to provide for older persons. The accommodation can be provided as individual homes or as part of a retirement housing scheme and may include communal facilities and on-site management.
  - Extra Care housing providing independent accommodation with 24 hour care and support available on site.
  - Residential and Nursing Care Homes.
- 8.79 The focus for specialist housing has tended to be for older persons; a reflection of the increasing proportion of this demographic. However, housing for younger adults (18-64) with specialist needs should also be recognised, and delivered in accordance with the requirements of Policy EN27.
- 8.80 In determining an appropriate proportion the Council will have regard to evidence of local need (where this is available), the scale and location of the site, including access to facilities (where appropriate, depending on the type of older person's accommodation that is proposed) and the viability of the development. Any case that is made on the topic of viability needs to be accompanied by a detailed viability assessment in order that it can be determined whether it is fully justified.
- 8.81 Providing sites are accessible by public transport, strategic housing developments can play an important role in meeting future needs for specialist older persons accommodation. This is recognised through the evidence provided by the study of housing needs of older people across Northamptonshire (March 2017) which also indicated that provision be made, in the first instance by zoning sites for future

development of older persons housing/care homes when public transport routes are in place.

### **Extra Care Housing**

- 8.82 Extra Care Housing is housing designed for the needs of older people who require varying levels of care and support available on site. People who live in Extra Care Housing can still occupy their own self contained homes, having their own front door. Extra Care Housing is also known as very sheltered housing, assisted living, or simply as 'housing with care'. It comes in many built forms, including blocks of flats, bungalow estates and retirement villages. It is a popular choice among older people because it can provide an alternative to a care home.

## **Policy EN27: Older people's housing provision**

**To help meet future requirements for retirement housing for older people, the Local Planning Authority will seek to ensure that a proportion of its overall housing provision will address the identified needs of the ageing population within the district unless it can be justified that such provision is not appropriate for the location or would have an adverse impact upon the deliverability and/or viability of the scheme.**

**To address the identified need and where there is access to local facilities and public transport services, larger sites will be required to provide for the needs of older households.**

**Larger sites will be expected to deliver a minimum of 10% of housing for older people.**

**For Sustainable Urban Extensions (SUEs), specialist housing requirements will be agreed with the Local Planning Authority through the preparation of a Masterplan Development Framework or a Strategic Masterplan. Elsewhere, due to the rural nature of the district, and to prevent the loss of opportunities to provide accommodation for older people, a threshold hierarchy will be applied so that, in respect of older people's housing, other larger sites will be classified as:**

- 50 or more dwellings in the towns of Rushden, Higham Ferrers, Irthlingborough and Raunds**
- 25 or more dwellings in the towns of Oundle and Thrapston; or**
- As opportunities for development in the villages are limited, and sites are often small scale in nature, all developments of 5 or more dwellings will be expected to deliver a minimum of 20% of housing for older people, unless evidence justifies a departure.**

**The criteria for site selection and design principles will also need to meet the requirements laid out in Appendix 5, although these will be relaxed in the villages in recognition of the difficulties in meeting them.**

**The type of housing provision required for older people will vary according to the scale and location of the development and will include:**

- a) Downsizing – Accommodation such as bungalows, apartments and other**

smaller

b) Retirement Housing will include bungalows and other high quality homes which may be 'age restricted' to older people.

c) Supported Housing for Older People – Extra Care:

i. SUEs and Strategic Sites

Mixed tenure Extra Care Housing should be provided on major strategic housing sites at Rushden East and Irthlingborough West. Masterplan Framework Documents for these developments should ensure such provision through the safeguarding of suitable sites and the setting out of design principles for delivery. Further consideration needs to be given to whether a future Extra Care Scheme or a retirement village would be sustainable at Tresham Garden Village once the necessary infrastructure, transport and local facilities are in place.

ii. Allocated sites

- St Christopher's Drive, Oundle (EN27), and Hayway, Northampton Road, Rushden<sup>108</sup> will, subject to viability, be supported to deliver specific Extra Care provision
- East of Ferrers School, Higham Ferrers<sup>109</sup> this site could also provide an opportunity to deliver a mixed tenure Extra Care scheme, subject to achieving suitable connectivity of the site to the town.

iii. Windfall sites

In addition to the strategic sites listed in this policy, the Council will encourage the provision of Extra Care accommodation in sustainable locations across the district, particularly within the designated growth and market towns.

d) Residential and Nursing Care Homes

Where the need for care homes has been identified, and is supported by Social Care and Health, these will be encouraged on strategic, allocated and windfall sites.

### Self and Custom Build

8.83 Self and custom build can play a key role in increasing housing supply, enabling more people to meet their aspirations of home ownership. Self build and custom build housing is defined as housing built by individuals or groups for their own use, either by building the home on their own (self build) or by working with housebuilders (custom build); this can assist in providing homes to meet individual requirements that aren't available in the current market. Government recognises that self build rates are lower in the UK than in other European countries and that

---

<sup>108</sup> Rushden Neighbourhood Plan Policy H2F

<sup>109</sup> Higham Ferrers Neighbourhood Plan Policy HF.H4

a number of barriers to delivery have been recognised, including access to suitable serviced plots, exacerbated through the planning system. A serviced plot is defined as a plot of land that has access to a public highway and has connections for the usual range of facilities including electricity, gas, water, waste water and digital connectivity, or can be provided with these services in specified circumstances or a defined period.

- 8.84 The NPPF requires local planning authorities to provide for a mix of housing reflecting both demographic trends and local community needs, including those groups of the community who wish to build their own home. The Council recognises that there is a growing interest from people to influence the design and specification and to build their own home and supports the belief that, if managed properly, self and custom housebuilding can make a meaningful contribution to the overall supply of housing in the area.
- 8.85 Policy 30 of the Joint Core Strategy supports the opportunity to bring forward proposals for individual and community custom build developments and requires that SUEs and other strategic developments should facilitate this provision by making available serviced building plots to assist delivery. In addition, it is envisaged that Neighbourhood Plans may also provide local communities with the opportunity to encourage self and custom build housing by creating new planning policies or allocating new development sites in their designated area to meet local need.

### **Self and Custom Build Register**

- 8.86 The Self Build and Custom Housebuilding Act (2015)<sup>110</sup> requires local planning authorities to keep a register of individuals and associations who are seeking to acquire serviced plots of land in order to build houses within the local area, and to have regard to this register as a material consideration in making planning decisions. The 2015 Act is supported by the Housing and Planning Act (2016)<sup>111</sup> which, together with associated secondary legislation (Regulations<sup>112</sup>), places a duty upon local planning authorities to set up a register and grant suitable development permission in respect of providing serviced plots of land to meet demand arising within the local area. It is therefore considered appropriate to set a target figure for providing that a proportion of development sites be identified through the Plan for self and custom build.
- 8.87 The Council set up its Self and Custom Build Register, with effect from 1 April 2016, as required by under the legislation. This provides some indication of the local level of demand for serviced plots. To fulfil this demand and encourage the contribution that self and custom build can make to the housing market mix, the Council will look to support applications for the delivery of serviced plots on suitable sites. To ensure that the Council is appropriately complying with the statutory duties for Self and Custom Housebuilding, more detailed guidance to enable delivery of these housing types will be provided by way of a supplementary planning document.

---

<sup>110</sup> <https://www.legislation.gov.uk/ukpga/2015/17/contents>

<sup>111</sup> <https://www.legislation.gov.uk/ukpga/2016/22/contents>

<sup>112</sup> <https://www.legislation.gov.uk/uksi/2016/105/contents/made>;  
<https://www.legislation.gov.uk/uksi/2016/950/contents/made>

## **Delivering Self Build**

- 8.88 The majority of self-build housing is likely to be delivered in the form of minor (1-2 dwelling) infill or other windfall developments. In most cases, these minor developments will be connected to services and/ or utilities through the statutory mechanisms for connecting to the distribution networks; i.e. electricity and/ or gas (Western Power), and water/ sewerage (Anglian Water Services).
- 8.89 Self build projects may also provide opportunities to deliver bespoke exemplar carbon neutral development proposals. For example, the development of innovative technologies or designs, in accordance with NPPF paragraph 79(e), may be achieved on an occasional basis through such “one off” schemes.

## **Delivering Custom Build**

- 8.90 Custom build housing, unlike self build, tends to be delivered by volume housebuilders. Most main housebuilders offer a range of standard specification dwelling types. However, these construction firms may also provide services to allow house buyers to design their own bespoke house/ houses.
- 8.91 In 2018 the Council appointed “Three Dragons” to prepare an assessment for forecasting demand and need for self and custom build housing<sup>113</sup>. This study compared the numbers of persons/ groups on the Self and Custom Build Register, finding that a mean average 28 dwellings per annum were being delivered through 1 and 2 dwelling sites, compared to a need to make provision for 39 dwellings per annum for self and custom build as a whole.
- 8.92 Single dwelling minor/ infill plots, together with conversions and/ or changes of use are appropriate to fulfil the need for self build housing. By contrast, the annual 11 dwellings self and custom build shortfall, identified by the Three Dragons study, could be met through setting policy requirements to provide custom build plots on medium to large scale dwelling schemes (i.e. 50-500 houses). The Council reviewed the Three Dragons study and concluded that a requirement for 5% of plots on sites of 50 or more dwellings should be sufficient to meet the shortfall and provide for delivery of custom build housing<sup>114</sup>. Further analysis is provided through the Self-build and Custom Housebuilding Background Paper (BP11<sup>115</sup>).
- 8.93 In order to ensure that serviced plots identified for self and custom build housing can be delivered, the local planning authority will require appropriate conditions to be put in place on an outline planning permission. Where schemes propose a range of housing types and tenures, development proposals will be expected to be divided into separate phases for site infrastructure, speculative development and each serviced plot. Furthermore, serviced plots should be offered for sale to

---

<sup>113</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11328/custom\\_and\\_self\\_build\\_demand\\_assessment\\_framework\\_three\\_dragons\\_december\\_2018](https://www.east-northamptonshire.gov.uk/downloads/file/11328/custom_and_self_build_demand_assessment_framework_three_dragons_december_2018)

<sup>114</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11329/enc\\_response\\_to\\_three\\_dragons\\_report\\_dec\\_2018](https://www.east-northamptonshire.gov.uk/downloads/file/11329/enc_response_to_three_dragons_report_dec_2018)

<sup>115</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12112/background\\_paper\\_11\\_-\\_self\\_and\\_custom\\_housebuilding](https://www.east-northamptonshire.gov.uk/downloads/file/12112/background_paper_11_-_self_and_custom_housebuilding)

custom and (where viable) self builders, for a minimum of 12 months, to allow developers to reclaim plots if they remain unsold and to prevent the possibility of undeveloped plots of land in the long term and planning applications for such developments should be accompanied by a comprehensive report detailing how it is intended to deliver the development in a timely manner.

- 8.94 Policy EN28 (below) sets out the policy requirements to make provision for self and custom build housing. It does not, however, set targets for the building of dwellings by individuals on plots, other than custom build serviced plots.

### **Policy EN28: Self and custom build housing**

**New build developments will make provision for the delivery of serviced plots for self and custom build housing in suitable locations, where proposals are in compliance with other plan policies.**

#### **a) Self build housing**

**Proposals for self build housing developments on infill or other windfall development sites within urban areas, freestanding villages or ribbon developments will be supported where these fulfil the requirements of relevant design and place-shaping policies. To be regarded as a self build housing plot, a site should:**

- i) Provide for a single unit net increase change of use, conversion or new build, or alternatively a replacement dwelling;**
- ii) Allow for access to a highway; and**
- iii) Allow for sufficient opportunities to provide electricity, water and waste water connections, or make adequate alternative arrangements.**

#### **b) Custom build housing**

**On sites of 50 or more dwellings, 5% of the plots should be made available on site as serviced custom build plots. These serviced plots should be offered for sale for custom (or self) build for a minimum of 6 months, after which these may be released for general market housing as part of the consented scheme. To be regarded as a custom build housing plot, a site should:**

- i) Include servicing, as part of the overall physical infrastructure obligations for the development as a whole;**
- ii) Be clearly identified and offered for sale for custom (or self) build for a minimum of 6 months; and**
- iii) Be situated in order to provide opportunities for enhancement of the local distinctiveness of the development site in accordance with the relevant design and place shaping policies.**

**On sites of less than 50 dwellings provision of custom build housing will be supported, including sites which are solely custom build sites, provided they comply with the spatial development strategy.**

**Detailed guidance and direction regarding delivery mechanisms for self and**

**custom build housing will be provided through a supplementary planning document.**

### **Gypsies, Travellers and Travelling Showpeople**

- 8.95 Government policy requires local planning authorities to use evidence to plan positively and manage development for the travelling community, using a robust evidence base to establish accommodation needs to inform local plan policy along with the determination of planning applications.

### **Provision for Gypsies and Travellers 2011-2022**

- 8.96 Policy 31 of the JCS provides that sufficient sites for Gypsies, Travellers and Travelling Show People accommodation, will be identified in line with a clear evidence base. It sets out a pitch provision (2011-2022) based on findings of the 2011 North Northamptonshire Gypsy and Traveller Accommodation Assessment (GTAA)<sup>116</sup>, which updated the 2008 Assessment.
- 8.97 The 2011 GTAA informed the requirements for pitch provision for the period 2011-2022 in the Joint Core Strategy, Table 7. This advised that over the first 11 years of the Plan period a requirement to provide 14 pitches in the district, comprising a mixture of residential and transit pitches in addition to plots for travelling show people.
- 8.98 Policy 31 of the Joint Core Strategy also requires the Council to protect existing lawful sites, plots and pitches for gypsy and travellers within the district. Where necessary it requires Part 2 Local Plans to allow any further sites required to meet identified need, setting out criteria to guide the consideration of locations for new sites.

### **GTAA update 2019**

- 8.99 The GTAA was comprehensively updated during 2018 to accord with the current planning definition of a Traveller, as defined in national policy (Planning Policy for Traveller Sites, August 2015<sup>117</sup> and NPPF, February 2019) and legislation (2016 Housing and Planning Act). The GTAA update was undertaken to provide a robust, defensible and up-to-date evidence base about the accommodation needs of Gypsies, Travellers and Travelling Showpeople in North Northamptonshire. National policy requires that only those households which fall within the statutory definition now need to be formally assessed for the GTAA<sup>118</sup>. Households that do not meet the current definition should be assessed as part of the overall housing

---

<sup>116</sup> <http://www.nnjpdu.org.uk/publications/north-northamptonshire-gypsy-and-traveller-accommodation-assessment-update-2011/>

<sup>117</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

<sup>118</sup> To meet the planning definition, households need to demonstrate that they “travel for work purposes, or seeking work, and stay away from their usual place of residence when doing so (or who have ceased to travel temporarily due to education, ill health or old age)”. The definition does not specify a “temporary” time limit, although being away for 2-3 months at a time (e.g. seasonal work) provides an indicative guide.



need and their needs will be addressed through other Plan policies; e.g. Policy EN28: Self and custom build housing.

- 8.100 The GTAA (2019) identified no gypsy and traveller households who met the planning definition, 67 undetermined households who may meet the planning definition and 6 households who did not meet the planning definition. Four travelling showpeople households were identified who met the planning definition.
- 8.101 The needs assessment compared known supply (i.e. vacant pitches) with a range of identifiable household needs including unauthorised sites and new household formation (e.g. teenagers). Table 19 below provides details of residual needs for Gypsies, Travellers and Travelling Showpeople.

**Table 19: Identifiable needs for Gypsy, Traveller and Travelling Showpeople accommodation 2018-2033.**

| Status                          | Identified need 2018-31 | Identified need 2031-2033 |
|---------------------------------|-------------------------|---------------------------|
| <b>Gypsies and Travellers</b>   |                         |                           |
| Meet Planning Definition        | 0                       | 0                         |
| Undetermined                    | 14                      | 3                         |
| Do not meet Planning Definition | 11                      | 0                         |
| <b>Travelling Showpeople</b>    |                         |                           |
| Meet Planning Definition        | 6                       | 0                         |
| Undetermined                    | 0                       | 0                         |
| Do not meet Planning Definition | 0                       | 0                         |

- 8.102 The GTAA identifies a need for 0 pitches for gypsy and traveller households who meet the planning definition and a need for 17 pitches for undetermined households. The GTAA estimated that applying national averages of households who meet the definition the undetermined need could result in a need for 4 pitches. Policy 31 of the JCS provides a criteria-based policy for addressing needs from undetermined households who subsequently demonstrate that they meet the planning definition
- 8.103 The GTAA identifies a need for 6 plots for travelling showpeople households who meet the planning definition. The North Northamptonshire Gypsy and Traveller Site Allocation Policy DPD will include policies and allocations to meet need arising from households who met the planning definition across North Northamptonshire, the need for Travelling Showpeople plots will therefore be addressed through the preparation of this document.
- 8.104 No sites have been proposed or granted planning permission within East Northamptonshire since the start of the Plan period. No representations were received in respect of the district's provision for Gypsy and Traveller accommodation through the draft Plan consultation (November 2018 – February 2019) or Regulation 18 consultation (January – March 2017).
- 8.105 Overall, the residual requirements for additional gypsy and traveller pitches are minimal and relate to undetermined need which can be met using criteria based

policies, therefore there is no need to allocate further sites in the Plan to fulfil requirements. If future proposals are forthcoming, Policy 31 of the Joint Core Strategy provides a clear steer for assessing any such future planning applications that may arise. The need for travelling showpeople plots will be addressed through the North Northamptonshire Gypsy and Traveller Site Allocation Policy which will address need for gypsy, traveller and travelling showpeople accommodation across North Northamptonshire.

## 9.0 Delivering Sustainable Urban Extensions

9.1 The Joint Core Strategy (Annex A), made provision for the delivery of 2,300 dwellings (27% of the total requirement for 8,400 dwellings) and accompanying jobs, facilities and services at the two Sustainable Urban Extensions (SUEs) within the District during the Plan period. Trajectories for SUEs in subsequent Authorities' Monitoring Reports (2017<sup>119</sup>, 2018<sup>120</sup>, 2019 and 2020) have seen the anticipated delivery at these progressively diminishing; such that as at 1 April 2020 it is currently forecast that just 1250 dwellings would come forward at the two sites by 2031 (15% of the total requirement). Table 22 below provides a comparison between the 2016 (Joint Core Strategy adoption) and 2020 (latest Authorities' Monitoring Report) positions.

**Table 20 Sustainable Urban Extensions - Anticipated delivery by 2031**

| Sustainable Urban Extension | Relevant Policy reference | Anticipated delivery by 2031                                 |  |
|-----------------------------|---------------------------|--|--|
|                             |                           | Joint Core Strategy (JCS), Annex A (base date, 1 April 2016) | 2020 Authorities Monitoring Report (base date, 1 April 2020) |
| Rushden East                | JCS Policy 33             | 1,600  | 1050   |
| Irthlingborough West        | JCS Annex A               | 700  | 200  |
| <b>TOTAL</b>                |                           | <b>2,300</b>   | <b>1250</b>  |

9.2 The effective implementation of the overall spatial strategy, as defined by the Joint Core Strategy, is underpinned by the timely delivery of the SUEs across North Northamptonshire. It was concluded by the Inspector; that the overall urban-focused spatial development strategy concentrating “*on existing towns and a series of deliverable SUEs represents the most suitable and sustainable strategy for the area over the plan period*” (paragraph 91, Joint Core Strategy Inspector’s Report, 22 June 2016<sup>121</sup>).

9.3 Delivery of the two SUEs (at least, in part) remains important to delivery of the Local Plan as a whole. This section will provide the necessary additional policy direction

<sup>119</sup> <http://www.nnjpdu.org.uk/publications/amr-2016-17-assessment-of-housing-land-supply-2018-23-may-2018/>

<sup>120</sup> <http://www.nnjpdu.org.uk/publications/amr-2017-18-assessment-of-housing-land-supply-2019-24/>

<sup>121</sup> <http://www.nnjpdu.org.uk/publications/north-northamptonshire-joint-core-strategy-inspectors-report-22nd-june-2016/>

which, in association with the strategic framework set by the Joint Core Strategy, should allow for the timely implementation of the SUEs.

### **Rushden East**

- 9.4 The Joint Core Strategy (Policy 33) provides a comprehensive framework for delivering the principal strategic development proposals to the east of Rushden. This Sustainable Urban Extension is anticipated to be delivered over the duration of the next 20 years. Of this, 1050 (out of up to 2,700 dwellings) are currently anticipated to come forward by 2031.
- 9.5 Joint Core Strategy Policy 33 anticipated that the detailed development proposals should be supported by an agreed development masterplan, which would guide the development of Rushden East through the Local Plan Part 2 or a planning application (Joint Core Strategy, paragraph 10.31), which ever comes forward first. The draft Masterplan Framework was published for consultation during February/ March 2020, this emphasises that the Rushden East Sustainable Urban Extension should be delivered in accordance with the Government's Garden Communities principles.
- 9.6 Notwithstanding, the Joint Core Strategy does not define a firm development boundary for the Rushden East Sustainable Urban Extension. Instead, it provides an indicative broad location (Figure 23). Given that the Masterplan Framework has not, as yet, been finalised it is considered necessary for this Plan to define the extent of the development area in the interests of clarity and surety. The site allocation has capacity to accommodate at least 2,700 dwellings, with potential capacity for further additional development in the longer term.
- 9.7 The extent of the site allocation shown on the Policies Map, is defined by Policy EN29 and depicted in Figure 15 below. The extent of the site allocation, as put forward in the Masterplan Framework, has been informed by the Landscape Character Assessment and Capacity Study (December 2014<sup>122</sup>) and the spatial framework defined by Joint Core Strategy Policy 11; i.e. the need to direct development towards Rushden.
- 9.8 A draft Masterplan Framework Document has been endorsed by the former Council and was published in February 2021. This document will be taken forward as a Supplementary Planning Document supporting Policy EN29. Policy EN29 sets out the settlement boundaries together with the main delivery principles required for the Rushden East Sustainable Urban Extension.

---

<sup>122</sup> <http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1549>

**Figure 15: Rushden East Sustainable Urban Extension**



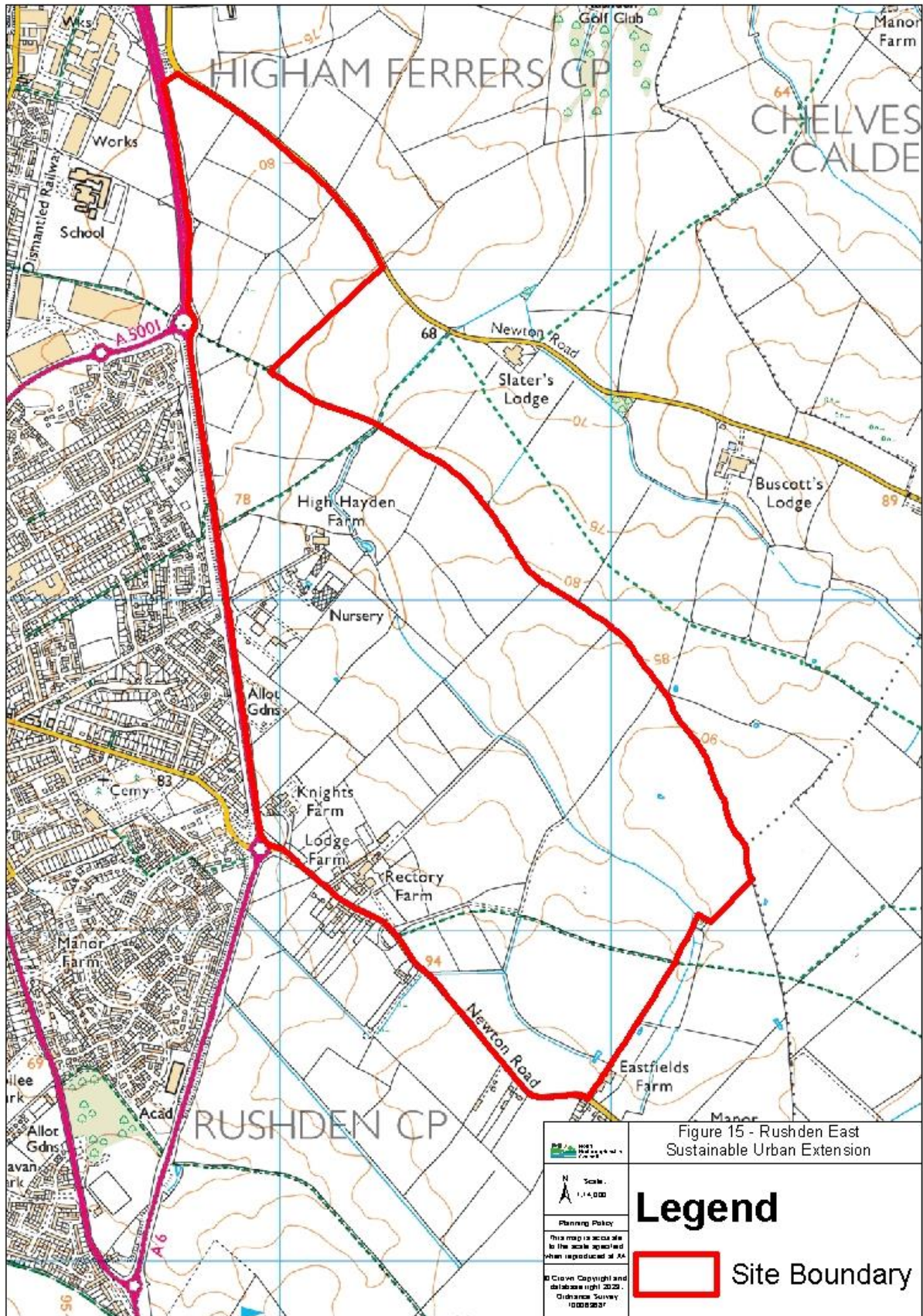


Figure 15 - Rushden East Sustainable Urban Extension

**Legend**

 Site Boundary

**Policy EN29: Rushden East Sustainable Urban Extension**

**In order to meet the requirements of Policy 33 of the adopted Joint Core Strategy the area shown on the local plan policies map, and defined in Figure 15, above, identifies the development boundaries for the delivery of the Rushden East Sustainable Urban Extension (SUE). This SUE constitutes a mixed use development, where land is allocated for up to 2,700 dwellings, a mix of retail, community facilities, employment development and open space, including two new primary schools, (and land reserved for a secondary school), a town park, allotments, sports facilities, a cemetery, and Suitable Alternative Natural Green Space and associated infrastructure.**

**Policy 33 of the adopted Joint Core Strategy requires a masterplan to be prepared to define the policy expectations for the development of the SUE. The Masterplan Framework Document (MFD) or Supplementary Planning Guidance, will support Policy EN29, providing detailed guidance for the delivery of the site. Planning applications will be required to be broadly consistent with the MFD and the principles of the Government's Garden Communities initiative.**

**Proposals for development will be granted planning permission where they are consistent with the relevant policy expectations listed below. Further detailed guidance and illustration on how these policy expectations might be met is set out in the MFD or Supplementary Planning Guidance.**

**Economic:**

- 1. Ensuring the delivery of the employment land, located on the northern part of the site, that aims to achieve parity between rates of new housing occupations and job creation, as set out in Joint Core Strategy Policy 33 criterion c.**
- 2. Providing opportunities for small-businesses and those driving enterprise and innovation.**
- 3. Provision of two local neighbourhood centres, incorporating 2 primary schools and land reserved for a secondary school, local shops, health facilities, community uses and employment space to be provided in the broad locations serving the northern and southern areas of the SUE, along with a programme for delivery relative to the phased delivery of housing.**
- 4. Provide clear evidence that connections for all users can be facilitated between development parcels within the SUE and further demonstrate that connections to adjacent land beyond the SUE boundaries are not prejudiced by the proposed development of the SUE. This includes the recognition of the opportunity to transform the character of the A6, whilst seeking to deliver options which are practical and deliverable.**
- 5. Crossings of the A6 at the John Clark and Newton Way Roundabouts and to Hayden Road, Rushden, are designed to incorporate the following key principles:**
  - Traffic signals provided to control vehicular traffic and allow for safe**

**pedestrian and cycle movement;**

- **Crossings at-grade to ensure maximum accessibility for pedestrians and cyclists;**
  - **Change in surface material to ensure that user priority is clear and that the crossing is legible for pedestrians, cyclists and drivers;**
  - **Minimum pedestrian crossing width of 8m to allow comfortable and safe movement for pedestrians.**
- 6. Provision of a Primary tier ‘loop’ Street through the SUE (to accommodate a service bus route) connecting the John Clark Way roundabout in the north with the Newton Road roundabout in the south and via the two neighbourhood local centres.**
- 7. Provision of a Secondary tier Street connecting with the Primary Street at the northern and southern ends of the SUE and the Hayden Road crossing and green corridor link in the centre.**
- 8. Provision of a hierarchy of streets and a legible and accessible network of dedicated footpaths and cycle paths.**
- 9. Provision of a central green corridor link through the SUE to Hayden Road and incorporating a dedicated footpath and cycle path, as well as formal tree planting.**
- 10. Provision of high quality, attractive and safe off-site connections for non-motorised and motorised users (including improvements to existing, as well as providing opportunities for new, bridge connections) between the SUE and the towns of Rushden and Higham Ferrers, and to the villages of Caldecott, Chelveston and Newton Bromswold.**
- 11. Provision for legal agreements to ensure infrastructure provided by one developer is shared, on an equitable basis, with all developers reliant upon that infrastructure to deliver their parts of the SUE, to ensure a comprehensive development of the SUE.**

**Environmental:**

- 12. Provide a sensitively designed environment incorporating:**
- **A network of green corridors and public open spaces, including a central green corridor, within and around the SUE, and landscaped edges.**
  - **A comprehensive enhancement of the A6 corridor between the John Clark Way and the Newton Road, including the provision of a planting strip with additional landscaping to safeguard the future widening of the A6. Built development would be expected to either front or be located side-onto the A6 corridor.**
  - **The retention of existing hedgerows and provision of formal street tree planting, particularly on higher order streets.**

- **Appropriate environmental and landscape measures to be incorporated into the design and construction of any proposals for large scale distribution units to ensure they are properly mitigated.**
- **Sensitive landscape treatment of the aircraft crash site.**
- **Environmental improvements on the approaches to the A6 bridge, including the surfacing and gradient of the footway, provision of lighting, along with improvements to the structure itself.**
- **An urban form that responds to the wider context and character of Rushden.**
- **A range of development with higher densities focussed around the two local centres.**
- **Suitable Alternative Natural Greenspace (SANG) of approximately 21 hectares, supported by a Habitats Regulations Assessment**
- **A Sustainable Urban Drainage System.**
- **High standards of resource and energy efficiency, and reduction in carbon emissions in accordance with the requirements of Policies 9 and 33 of the Adopted Joint Core Strategy.**
- **Viewing corridors of the spire of the Grade I listed Church of St Mary's Higham Ferrers into the detailed design and masterplanning of the SUE**
- **The preparation and agreement of Design Codes to guide planning applications for the SUE.**
- **A design brief, which will be prepared for the grey land to ensure a cohesive approach to development.**

**Social:**

13. **Provision of a new Town Park (of approximately 3.6ha).**
14. **Provision of formal, informal open space, and sports pitches (including ancillary facilities) in accordance with guidance contained in the Council's KKP Open space and Playing Pitch Strategy 2017, or subsequent update.**
15. **Provision of a Cemetery (approximately 2ha) with access, parking and relevant supporting infrastructure.**
16. **Provision of allotments in the northern and southern neighbourhoods (approximately 2.20ha).**
17. **Prepare and agree a delivery strategy (including onward adoption and management arrangements) for all education, energy, drainage, community, social, health infrastructure, SANG provision and associated public realm (including off-site and on-site roads, cycle routes and paths).**
18. **Provision of a mix of dwelling types, sizes and tenures (including specialist**



housing provision and home working/larger homes) to accord with housing Policies EN25-EN28, and Policy 30 of the Adopted Joint Core Strategy, together with relevant Neighbourhood Plan policies.

The SUE will be developed as a sustainable place providing a range of opportunities and services that support meeting local needs on a daily basis. The development proposal will need to ensure it can demonstrate good integration within the wider setting taking into account both the natural and built environment. It will maximise sustainable travel connections and provide convenient and attractive cycle and pedestrian connections so that the proposed development is integrated with the existing communities, facilities and services in the town centres of Rushden and Higham Ferrers.

However, in accordance with the policy objectives for the “grey land” within the SUE, to deliver a “bespoke residential character”, the Council will bring forward detailed design guidance through a Supplementary Planning Document.

The infrastructure requirements for the proposed SUE are to be provided for through planning conditions and/or planning obligations following the principles of fairness and proportionality. To ensure all parts of the SUE make an appropriate contribution towards the SUE infrastructure it is expected that collaboration will be sought as part of S106 planning obligations.

### **Irthlingborough West**

- 9.9 Outline planning permission for the Irthlingborough West sustainable urban extension was granted in November 2014<sup>123</sup>, subject to the completion of a S106 agreement. Amended conditions and the draft S106 Agreement Heads of Term were subsequently agreed in August 2015<sup>124</sup>. This site is identified as a strategic commitment in the Joint Core Strategy.
- 9.10 Since 2015 progress with S106 negotiations has been limited, due to ongoing uncertainties regarding development viability. The trajectory has been revised to take account of continued deliverability (viability) issues, predominantly due to infrastructure obligations and the necessary site remediation work arising from the former Irthlingborough mine workings. Given the passage of time since the development was initially approved, it is probable that the S106 agreement would need to be comprehensively reviewed.
- 9.11 The allocation of additional housing land to the south east of Rushden (Policy EN24, above) has been necessitated due to the ongoing uncertainties around the delivery trajectory for Irthlingborough West; as much as that for Rushden East. The Joint Core Strategy allows for some offsetting of settlement specific housing requirements in the case of Growth Towns and Market Towns (i.e. Rushden and Irthlingborough), would meet a shortfall in deliverable sites at another settlement within the same Part 2 Local Plan area (Joint Core Strategy paragraph 9.10).

---

<sup>123</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/547/development\\_control\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/547/development_control_committee)

<sup>124</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/600/planning\\_management\\_committee\\_formerly\\_known\\_as\\_development\\_control\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/600/planning_management_committee_formerly_known_as_development_control_committee)

- 9.12 Notwithstanding, the Council will continue to work to promote and support the successful delivery of Irthlingborough West. The breakdown of the development area is set out in Table 21, below.

**Table 21 - Irthlingborough West - breakdown of the development area**

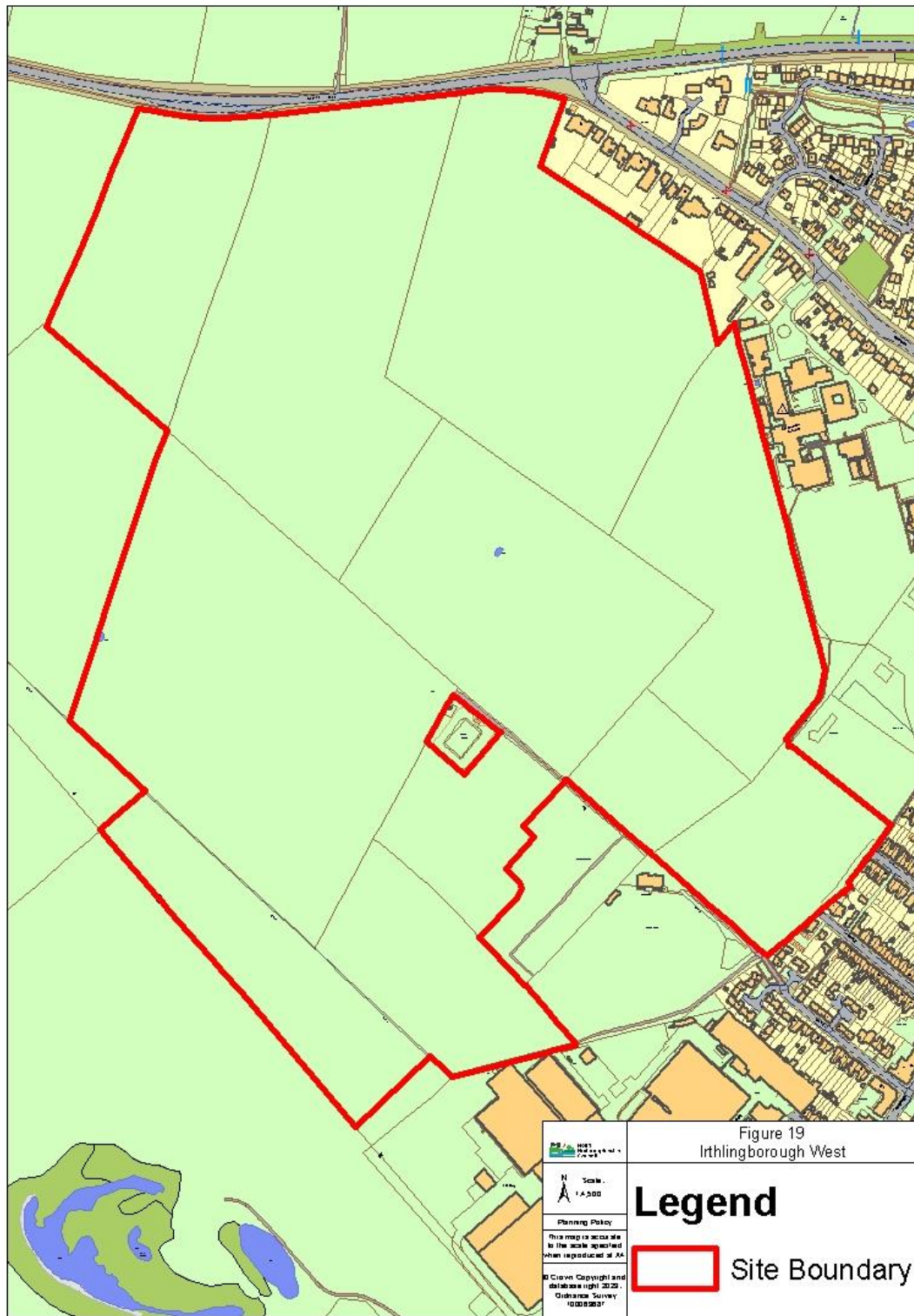
| <b>Land use typology</b>                                       | <b>Gross developable area (ha)</b> |
|--|------------------------------------|
| Residential  | 23.45                              |
| Employment (office, industrial and/ or storage or warehousing) | 7.5                                |
| Open space and structural landscaping                          | 11.57                              |
| Huxlow Science College extension                               | 7.11                               |
| <b>TOTAL</b>   | <b>49.63</b>                       |

- 9.13 The spatial extent of the site is defined by the application submitted in 2010 (reference 10/00857/OUT). The application was accompanied by a masterplan. This was refined through the development management process; such that the final illustrative masterplan (dated March 2013<sup>125</sup>) was approved by the former Council (Development Control Committee) on 24 November 2014. The site plan for Irthlingborough West is shown at Figure 16, below.

**Figure 16: Irthlingborough West site plan**

---

<sup>125</sup> <https://publicaccess.east-northamptonshire.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=L21KMIGO03N00>



9.14 The extent of the Irthlingborough West SUE is defined by the approved masterplan. The Council will work to deliver the SUE in line with the masterplan.

## 10.0 Town Centre Strategies

- 10.0 The East Northamptonshire area includes six towns, each of which contains services and facilities that serve a wider catchment area, and provide the opportunity for future growth and investment. This is recognised through the spatial policy direction set out in the Joint Core Strategy and explained further through the earlier sections of this Plan, which provide an area portrait and spatial development strategy in respect of the towns. This Plan will also consider the fundamentals of town centres as hubs for social interaction within the local community as the basis for understanding how town centres need to evolve to be fit for purpose in 21<sup>st</sup> Century Britain.
- 10.1 This section of the Plan seeks to promote the vitality and viability of the six towns, by allowing the potential for each town to prosper and diversify whilst meeting the district's development needs in a sustainable manner. This will include providing the opportunity for each town to respond to evolving market conditions, by identifying future investment potential and providing the flexibility to respond to changes in demands for different uses.
- 10.2 The Joint Core Strategy sets a general presumption in favour of the re-use of suitable previously developed land and buildings within the urban areas. This Plan will provide further direction by identifying particular sites, within the main urban areas, that can actively contribute to supporting the future prosperity and activity of each town.
- 10.3 In addition to policy direction provided through the Joint Core Strategy, this Plan will seek to complement those detailed town centre related policy proposals set out in Neighbourhood Plans. Neighbourhood Plans for Rushden, Higham Ferrers and Raunds are already in place; whilst a Neighbourhood for Irthlingborough is at an early stage of preparation. There is no Neighbourhood Plan in preparation for Thrapston, or Oundle. Thrapston Town Council has proposed to work with the Council to secure local aspirations through this Plan.
- 10.4 The Plan sets out overarching guiding principles for the re-imagination of the six town centres. This is supplemented by individual town strategies, recognising policy initiatives identified in the relevant Neighbourhood Plans, but providing additional project and/ or site specific detail where appropriate. Each town strategy is structured in the following way:
- **Spatial character** – An assessment of the key characteristics of each urban area undertaken to inform decision making, based upon concepts outlined in the 2015 Urban Structures Study<sup>126</sup> and character area designations set out in some Neighbourhood Plans;
  - **Town centre re-imagination** – site specific redevelopment proposals for town centre sites (where applicable);
  - **Other redevelopment opportunities** e.g. sites identified in the Brownfield Land Register<sup>127</sup>.

---

<sup>126</sup> <http://www.nnjpdu.org.uk/publications/north-northamptonshire-urban-structures-study-january-2015/>

<sup>127</sup> <http://www.nnjpdu.org.uk/publications/north-northamptonshire-brownfield-land-register-2020/>

## Reimagining Town Centres – guiding principles

- 10.5 The Joint Core Strategy sets out the overarching spatial policies for the six towns (Policy 11(1)). Further direction for the town centres is set out at Policy 12(d) for Rushden and Policy 12(f) for the other market towns.
- 10.6 This Plan provides additional guiding principles to support the re-imagination of all town centres, in order to enhance and/ or maintain their vitality and viability as community hubs. These principles will be complemented through an assessment of assets, challenges and opportunities which will inform future delivery strategies for each town. A number of future redevelopment or investment opportunities exist within the town centres, including those identified through ongoing stakeholder involvement which has informed the preparation of this Plan.
- 10.7 It is important to remember that the varied range of functions and roles that the town centres perform, over and above the retail offer. Main town centre uses should be supplemented by other opportunities; e.g. training facilities, art and craft events, ‘pop up’ businesses or ‘above shop’ living. Such activities all have the potential to enhance the town centres’ offer.
- 10.8 Economic Development is an issue for Rushden and the market towns as a whole, not just the town centres. There are many challenges to delivering sustainable economic growth for the six urban areas, although the town centres must be supported as a critical aspect of the spatial strategy.
- 10.9 In preparing this Plan, views of the strengths and weaknesses of the district’s town centres were sought, both through public consultation and through a series of stakeholder events held with ward Councillors and with Town and Parish Councils. Policy EN30 sets out a framework for assessing development opportunities within the wider town centres, as and when these arise. Strategies for each town will also be prepared to provide further site specific guidance, where appropriate.

### **Policy EN30: Reimagining Town Centres – guiding principles**

**Development proposals for the town centres: Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston should seek to increase local community interaction, by increasing footfall to sustain and enhance vitality and viability. The Council will work proactively with stakeholders where opportunities arise within the identified Growth and Market Towns to secure the following outcomes:**

- a) Maintain a mixture of uses that attract visitors and encourage greater social interaction, including both economic, social and, in some circumstances, residential, uses;**
- b) Consolidate and improve the retail offer of the town centres, by way of enhancements to identified active frontages;**
- c) Improve the leisure and cultural offer of each town to provide for the growth of both day and night time economies;**
- d) Seek to Implement high quality public realm improvements, including the development of new landmark features, within town centres especially**

**addressing gateway sites, as identified in town strategies or neighbourhood plans;**

- e) Seek enhancements to pedestrian connectivity both within town centres, and to residential and employment areas beyond; and**
- f) Encouraging a step change in the quality of urban design, providing sustainable development with a focus on low carbon energy solutions, through measures including green initiatives such as urban tree planting.**

**Development opportunities will be informed by the preparation of town strategies, with site specific details set out through development briefs.**

## **Rushden**

10.10 The Joint Core Strategy (Table 1) defines Rushden's status as the Growth Town; the focus for major regeneration and growth within the district. The majority of this growth will be delivered through the following strategic sites:

- Rushden East Sustainable Urban Extension (including a minimum of 2,500 new homes, rising to 2,700 for later development phases beyond the current Plan period, employment and supporting community and leisure facilities);
- Land at Nene Valley Farm, Northampton Road, also known as "Rushden Gateway" (employment); and
- Rushden Lakes (focus on retail, leisure and tourism).

## **Rushden Neighbourhood Plan**

10.11 The Rushden Neighbourhood Plan provides further detailed policies for managing development within the Parish area. This was made in June 2018 and sets out policies which address the following issues:

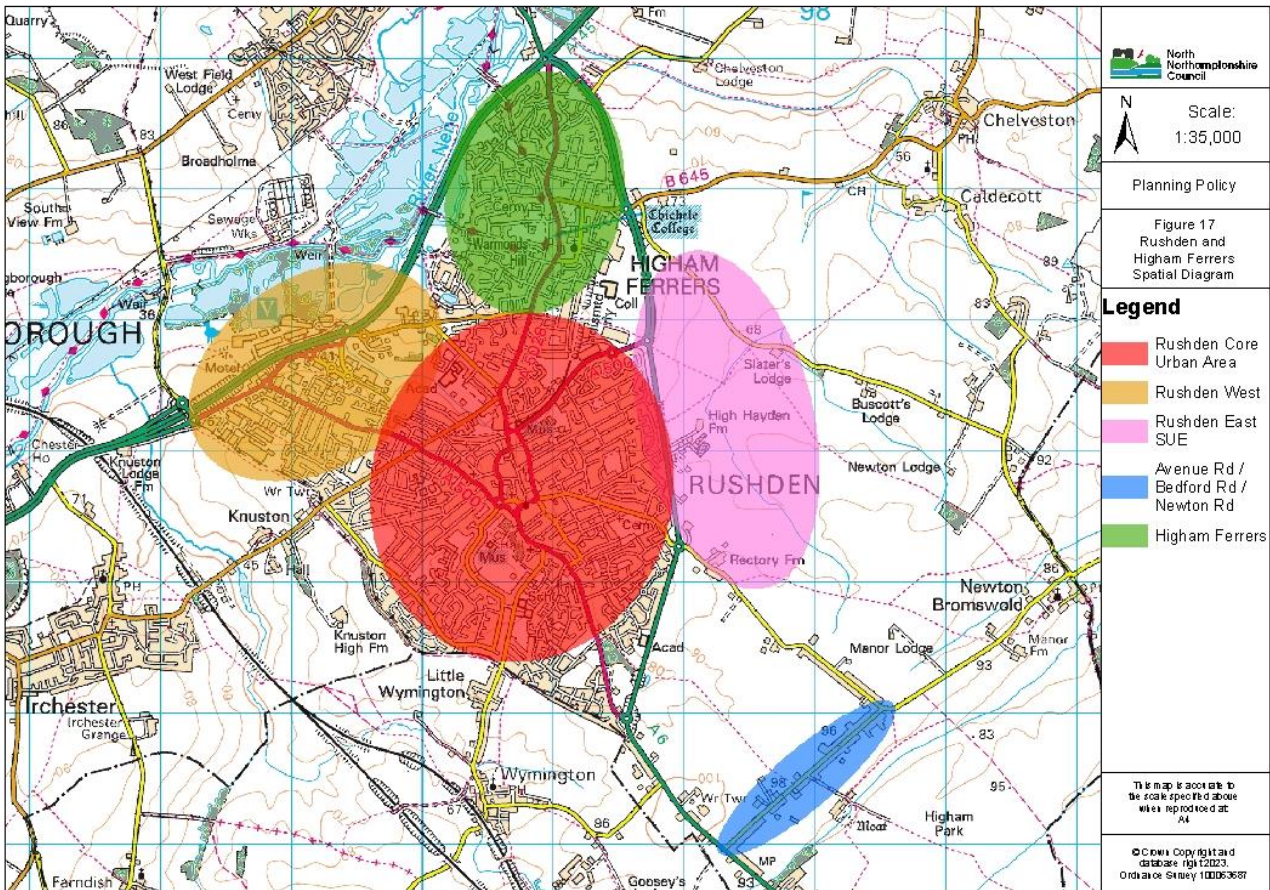
- Managing new development within the defined urban area;
- Promoting housing allocations for over 600 dwellings within the urban area;
- Preferred housing mix, types and making provision for self-build housing ;
- Design, landscaping, enhancing the public realm, including town centre car parking;
- Town centre – mix of uses, shopping frontages and first floor uses; and
- Employment – delivery of new and retention of existing employment floorspace.

## **Spatial character**

10.12 The urban areas of Rushden and neighbouring Higham Ferrers consist of four distinctive spatial elements, plus the Avenue Road/ Bedford Road/ Newton Road ribbon development. The spatial strategy for the latter is defined by Policy H1 of the Neighbourhood Plan. Figure 17 and Table 22 (below) set out the main characteristics of each spatial area.



**Figure 17: Rushden and Higham Ferrers Spatial Diagram**



**Table 22 Spatial parts of Rushden and Higham Ferrers**

| Spatial parts of Rushden and Higham Ferrers | Characteristics  |
|---|--|
| Core urban area                             | <ul style="list-style-type: none"> <li>• Defined by radial routes – Higham Road/ High Street/ Bedford Road (north-south) and John Clark Way/ Newton Road/ Wellingborough Road (east-west)</li> <li>• Based around Victorian terraced roads, with former Boot and Shoe factory sites, with post-war suburban development to the south</li> <li>• Distribution centre to east of town centre, off John Clark Way (Spire Road) constructed late 2000s</li> <li>• Includes key services and facilities – town centre, leisure centres (Pemberton Centre/ Splash Pool), schools</li> <li>• Character defined main public open spaces – Rushden Hall Park, Spencer Park</li> </ul> |
| Rushden West (employment area)              | <ul style="list-style-type: none"> <li>• Main employment area of Rushden</li> <li>• Longstanding industrial area, has grown in a piecemeal way over a long period</li> <li>• Includes environmentally challenging businesses e.g. Monoworld, Sander’s Lodge (waste)</li> </ul>   |

| Spatial parts of Rushden and Higham Ferrers | Characteristics   |
|---|---|
|   | treatment)<br><ul style="list-style-type: none"> <li>• Incorporates Rushden Lakes and Rushden Gateway – main new employment sites</li> <li>• Includes enhanced visitor access to Nene Valley, via Rushden Lakes</li> </ul>  |
| Rushden East (Sustainable Urban Extension)  | <ul style="list-style-type: none"> <li>• Proposed strategic urban extension to east of A6 Bypass</li> <li>• Requires new east-west connections across A6</li> <li>• Development will include new community infrastructure; e.g. schools, neighbourhood centre</li> <li>• Development will be supported by strategic green infrastructure</li> </ul>   |
| Avenue Road/ Bedford Road/ Newton Road      | <ul style="list-style-type: none"> <li>• Ribbon development, connecting Newton Road, Avenue Road and Bedford Road</li> <li>• Suburban character</li> <li>• Includes a mix of rural businesses (e.g. stables) and more urban uses (e.g. care homes)</li> </ul>   |
| Higham Ferrers                              | <ul style="list-style-type: none"> <li>• Self contained urban area, enclosed by Rushden (south), A6 Bypass (east) and A45 Bypass (west)</li> <li>• Historic market town – includes many heritage assets e.g. Chichele College, Castle</li> <li>• Main employment area to the east of the town (south of Kimbolton Road)</li> <li>• Individual character areas are defined in the Higham Ferrers Neighbourhood Plan</li> </ul> |

10.13 In preparing this spatial character portrait a number of issues affecting Rushden have been identified:

- Achieving the delivery of the Joint Core Strategy allocated strategic sites at Rushden East, and Rushden Gateway (Nene Valley Farm);
- Opportunities to deliver improved connectivity and enhanced wellbeing through improved access to the Greenway;
- Town centre – improving overall character and quality; improving traffic management within the town centre (possible proposals to realign road network) with particular focus on the area bounded by the High Street, College Street and Duck Street;
- Sport and Leisure – future of existing leisure centres (Splash Pool/ Pemberton Centre);
- Reconfiguring town centre car parks to improve accessibility, whilst also driving mixed use development opportunities
- Environmental challenges arising from existing industrial operations e.g. Monoworld (Sander’s Lodge), Travis Perkins (town centre);
- Potential for additional tourist accommodation, especially in light of the success of Rushden Lakes (5 million visitors in its first year of operation);



- Design of new residential development within the urban areas; and
- Flood risk from culverted sections of Skew Bridge Dyke adjacent to the town centre (Duck Street, College Street, Station Road).

10.14 In many cases, the issues identified through the 2017/18 workshop events<sup>128</sup> are addressed through Neighbourhood Plan policies e.g. town centre public realm traffic and car parking within the town centres, housing design and mix, and housing land allocations. Furthermore, the Rushden West employment area is identified as being suitable and appropriate for waste management operation through the policies contained in the Northamptonshire Minerals and Waste Local Plan (adopted July 2017). Nevertheless, site specific policies are included within the Rushden town strategy, relating to the following:

- Town centre re-imagination;
- Other brownfield sites.

### **Town centre re-imagination**

10.15 The Rushden Neighbourhood Plan focuses upon managing development and the retention of public car parking within the existing town centre. It does not include site specific proposals for the enhancement or re-imagination of the town centre. It does, however, set out principles for enhancement of the public realm, including the identification of town centre gateway sites.

10.16 The Council's Economic Strategy seeks to revitalise and bring investment into the district's town centres. It proposes active measures for "Driving Town Centre Revitalisation". This is a particular issue for Rushden, as the designated Growth Town and largest town centre within the district.

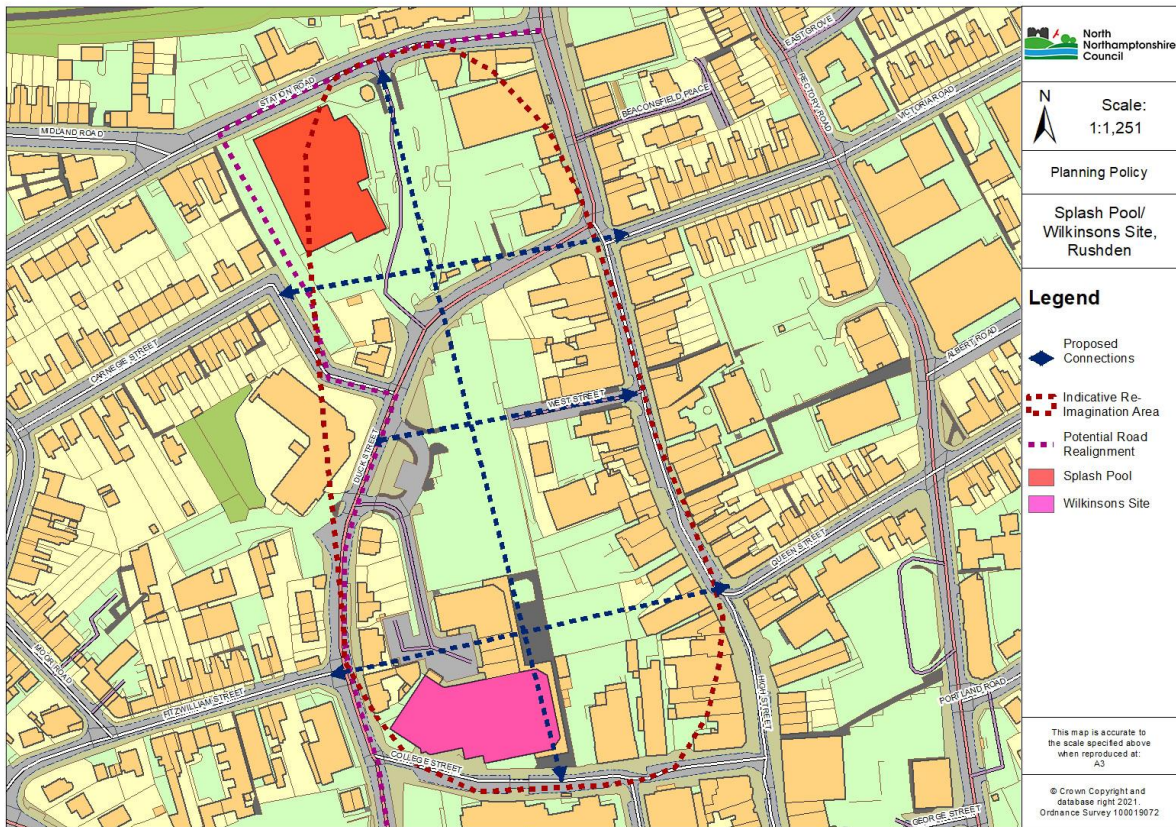
10.17 As part of the engagement with stakeholders in drafting the Plan, site specific opportunities for revitalising Rushden town centre have been identified as follows:

- Alfred Street and associated Tennyson Road School sites;
- Potential redevelopment of publicly owned town centre land holdings; e.g. Splash Pool and Wilkinson site, with possible linkages to High Street; College Street, Duck Street, Eaton Walk, Station Road, West Street;
- Reconfiguration of town centre car parking.

---

<sup>128</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/837/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/837/planning_policy_committee)  
[https://www.east-northamptonshire.gov.uk/meetings/meeting/853/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/853/planning_policy_committee)

**Figure 18: Rushden redevelopment opportunities**



10.18 Of the potential town centre re-imagination sites, the redevelopment of the Splash Pool and Wilkinson sites, two of the Council’s main remaining land holdings within the former district, is currently being pursued. Policy EN31 sets out redevelopment proposals for the Splash Pool and Wilkinson sites. Other redevelopment opportunities in and around the town centre will be guided by the town centre re-imagination principles (Policy EN30, above) and through the preparation of development briefs.

10.19 Release of the Splash Pool (Station Road) and/ or Pemberton Centre (HE Bates Way, to the west of the town centre) sites is dependent upon the development of replacement facilities. The Healthy and Active Lifestyles Strategy (October 2017)<sup>129</sup> recognises that developments coming forward around the south of the District (most notably Rushden East) will create significant additional demand for facilities. Relocation of existing facilities should be directed by a built sports facility strategy.

10.20 There is an existing foul and surface water sewer in Anglian Water’s ownership within the boundary of the Splash Pool site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private spaces (e.g. domestic gardens/ back yards) where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert the sewer may be required. The majority of the site is situated within Flood Zone 2. Whilst this does not preclude more vulnerable forms of

<sup>129</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/10496/healthy\\_and\\_active\\_lifestyles\\_strategy](https://www.east-northamptonshire.gov.uk/downloads/file/10496/healthy_and_active_lifestyles_strategy)

development (subject to appropriate flood mitigation measures), the site would be suitable for town centre uses, leisure or commercial uses.

### **Policy EN31: Splash Pool and Wilkinson site redevelopment, Rushden**

**Redevelopment proposals for the Splash Pool and Wilkinson sites together with the associated highways network, as shown as an area of opportunity in Figure 18 above, should deliver increased footfall and enhanced vitality and viability for the town centre.**

**The redevelopment would comprise ‘town centre uses’ to consolidate and improve the town centre retail offering, improve the leisure and cultural offering to encourage the growth of both day and night-time economies and offer ‘above the shop’ residential opportunities.**

**Whilst it is envisaged that redevelopment of this key centre site could be delivered in phases, the two main components (Wilkinsons and the Splash Pool) should be informed by a comprehensive development brief, which takes into account the following principles:**

- a) The creation of a pedestrian link between the High Street and the shop units on Eaton Walk;**
- b) The development of a new public square located between the High Street and Eaton Walk;**
- c) Providing improvements to the public realm to create a distinct quarter;**
- d) The reconfiguration and enhancement of public car parking provision to improve connection to the High Street primary shopping area;**
- e) The preservation and enhancement of the heritage assets on the site, in accordance with a heritage impact assessment;**
- f) The safeguarding of suitable access for the maintenance of foul drainage infrastructure;**
- g) In addition to the above, the redevelopment of the Splash Pool leisure site will be required to address the loss of the facility by providing an equivalent replacement facility and the Council will aim to undertake a built sports facilities strategy to inform future opportunities for its relocation as well as bringing forward the regeneration of this key town centre site.**

#### **Other brownfield sites**

10.21 The Rushden Neighbourhood Plan allocates six housing sites, delivering around 600 new homes. This covers virtually all of the remaining deliverable housing land within the main urban area. Three such sites have been identified, through the Brownfield Land Register or Employment Land Review, where redevelopment should be encouraged and supported through the Local Plan:

- Former factory site, between 71 Oakley Road and 37-51 Washbrook Road (0.28ha) – identified in Brownfield Land Register;

- The Windmill Club / Business Centre, Glassbrook Road (0.5ha) – assessed by Aspinall Verdi (Employment Land Review); and
- Rectory Business Centre (1.1ha) – assessed by Aspinall Verdi.

10.22 Site specific proposals to support the release of these sites for redevelopment are set out below.

### **Former factory site, between 71 Oakley Road and 37-51 Washbrook Road**

10.23 This former factory was vacated in 2009 and the site remains derelict. Various potential redevelopment proposals have been put forward, but none have been successful. The challenge in securing redevelopment of this site was recognised during 2016/17, when the Pilot Brownfield Register was set up. As at 2018 the 0.28ha Oakley Road factory site was the only outstanding site listed in the Brownfield Register remaining undeveloped, or without current planning permission. The Joint Planning and Delivery Unit (JPDU) recently identified this as a priority stalled housing site; appointing Local Partnerships to review potential approaches or interventions to support redevelopment (Stalled Sites Delivery Supporting Technical Report, May 2020)<sup>130</sup>.

10.24 Given that the site is not allocated in a development plan document, but is listed in the Brownfield Land Register, it is therefore necessary to set out development principles for the site through this Plan. These are set out in Policy EN32 (below).

10.25 Financial contributions to mitigate the adverse impacts of development upon the SPA/Ramsar site will be sought in accordance with the Addendum to the SPA Supplementary Planning Document: Mitigation Strategy. In line with the SPD requirements, consultation is required by Natural England in advance of submitting any planning application. As part of that consultation, further mitigation may be needed in exceptional circumstances and where Natural England advise. If a bespoke process is required, then a project level Appropriate Assessment will be required to accompany any planning application.

---

<sup>130</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11864/stalled\\_sites\\_delivery\\_supporting\\_technical\\_report\\_may\\_2020](https://www.east-northamptonshire.gov.uk/downloads/file/11864/stalled_sites_delivery_supporting_technical_report_may_2020)



**Figure 19: Former factory site, between 71 Oakley Road and 37-51 Washbrook Road, Rushden**



**Policy EN32: Former factory site, between 71 Oakley Road and 37-51 Washbrook Road, Rushden**

The vacant Oakley Road factory site, as shown on the Policies Map, is allocated for the development of approximately 10 dwellings. The development should provide for:

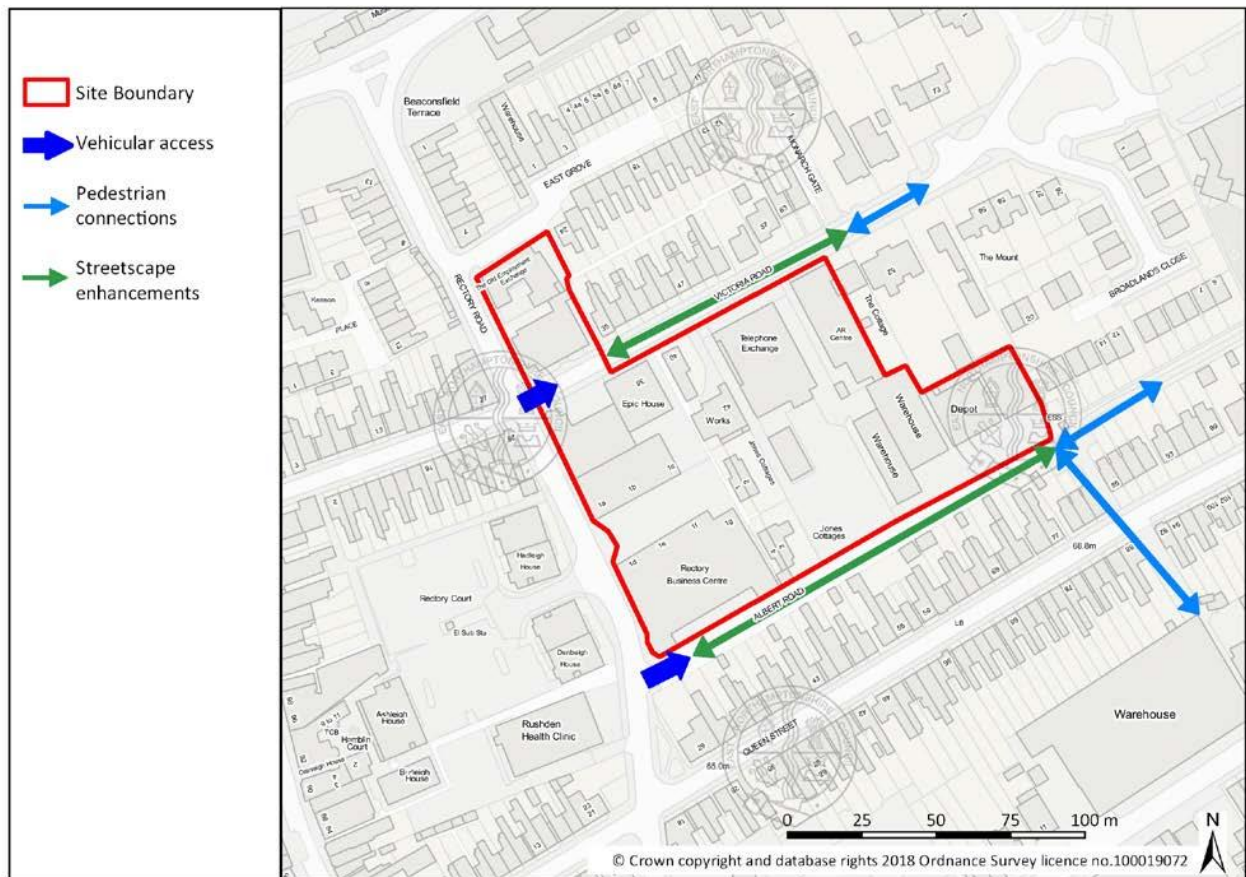
- a) A mix of housing types and tenures to meet local needs, consisting of predominantly small and medium sized properties;
- b) Appropriate development contributions towards education (primary and secondary), employment and the Greenway;
- c) Vehicular access off Oakley Road; and
- d) Pedestrian and cycle connections to Washbrook Road and the Greenway.

**Employment sites recommended for development**

10.26 The Employment Land Review (March 2019) recommended that two employment areas should be released for alternative uses. In both cases, it was found that the existing employment premises were found to be in poor condition and coming to the end of their useful economic lives.

- 10.27 The 0.5ha Windmill Club/ Business Centre, Glassbrook Road, consisting of small business units and a social club, is situated within a predominantly residential area, adjacent to the Pemberton Centre. This dry leisure centre was previously considered for redevelopment, along with the town centre Splash Pool site, as part of wider proposals for a new Rushden Leisure Centre. It remains uncertain when these longstanding proposals for a new leisure centre could be delivered, although any future masterplan for redevelopment of the Pemberton Centre could also incorporate the Windmill Club and Business Centre site.
- 10.28 The larger (1.1ha) Rectory Business Centre and adjacent telephone exchange, warehousing and factory premises, are situated adjacent to the town centre to the east of Rectory Road, between Albert Road and Victoria Road. This significant and long established employment area has poor and difficult road access, with the current units in a poor state of repair and nearing the end of their economic lives. The Employment Land Review found that the site is situated within a predominantly residential area, so would be well suited for housing.
- 10.29 Policy EN33 supports the redevelopment of the Rectory Business Centre employment area between Albert Road and Victoria Road for residential uses. This sets out key development principles, as and when the site becomes available for redevelopment.
- 10.30 There is an existing sewer, in Anglian Water's ownership, within the boundary of the Rectory Business Centre site and the site layout should be designed to take this into account. This existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing drainage/ sewerage infrastructure may be required.
- 10.31 Financial contributions to mitigate the adverse impacts of development upon the SPA/Ramsar site will be sought in accordance with the Addendum to the SPA Supplementary Planning Document: Mitigation Strategy. In line with the SPD requirements, consultation is required by Natural England in advance of submitting any planning application. As part of that consultation, further mitigation may be needed in exceptional circumstances and where Natural England advise. If a bespoke process is required, then a project level Appropriate Assessment will be required to accompany any planning application.

**Figure 20: Rectory Business Centre, Rushden**



**Policy EN33: Rectory Business Centre, Rushden**

Redevelopment of the Rectory Business Centre site, as shown on the Policies Map, will be supported for residential development, for approximately 35 dwellings. Redevelopment proposals will be informed by a comprehensive masterplan and should deliver:

- a) A mix of housing types and tenures to meet local needs, consisting of predominantly small and medium sized properties;
- b) Improved vehicular access and parking arrangements, upgrading the Albert Road and Victoria Road junctions with Rectory Road;
- c) Enhancements to the public realm, especially the streetscapes of Albert Road and Victoria Road;
- d) Improved east-west pedestrian and cycle connectivity between the town centre and residential areas to the east, including appropriate crossing arrangements along Rectory Road; and
- e) The preservation and enhancement of the heritage assets on the site, in accordance with a heritage impact assessment, and
- f) The safeguarding of suitable access for the maintenance of foul drainage infrastructure

## Higham Ferrers

- 10.32 The Joint Core Strategy (Table 1/ Policy 11) sets a distinctive spatial strategy for Higham Ferrers, as providing a localised convenience and service role, with growth pressures directed to Rushden. This provides recognition of Higham Ferrer's close function relationship with its larger neighbour and Growth Town.
- 10.33 The Higham Ferrers Neighbourhood Plan (made April 2016) sets out a comprehensive range of detailed policies for the town, regarding:
- Housing – windfall development, mix and tenure;
  - Site specific policies/ allocations – Land east of Ferrers School, Higham Ferrers East (part of Rushden East);
  - Provision, protection and enhancement of community facilities;
  - Development management – design (e.g. character areas), heritage assets;
  - Green infrastructure – Greenway extensions, Local Green Space;
  - Communications – Chowns Mill junction improvements, development of broadband, connections;
  - Residential parking standards;
  - Town centre – managing uses (e.g. hot food takeaways), public realm improvements.
- 10.34 Higham Ferrers' spatial character is considered alongside neighbouring Rushden, in Table 24, above. This recognises the strong functional relationship between the two towns, and the different but closely related spatial development strategies (see Policy EN1). Furthermore, the Neighbourhood Plan includes detailed guidance regarding various defined character areas which make up the urban area.
- 10.35 Whilst the Neighbourhood Plan contains detailed policies for managing development within the town centre, the stakeholder engagement for this Plan revealed a significant brownfield redevelopment opportunity within Higham Ferrers.

## Brownfield sites

- 10.36 One significant potential redevelopment opportunity within the Higham Ferrers urban area has been identified. This is the brownfield Federal Estates site, south of Newton Road and east of William Steele Way.
- 10.37 The 4.4ha Federal Estates and former Textile Bonding factory sites are situated within the designated Employment Protection Area, designated as such by the Neighbourhood Plan and JCS Policy 22(c). Nevertheless, the sites contain two large warehouses and a factory, which have stood vacant for over 10 years. Despite long term marketing of the Federal Distribution Centre site and former Textile Bonding factory the units (totalling over 18,000m<sup>2</sup>) remain vacant. The NPPF and relevant Local Plan policies allow for the release of sites for alternative uses where there is no reasonable prospect of an application coming forward for the allocated use (paragraph 122).

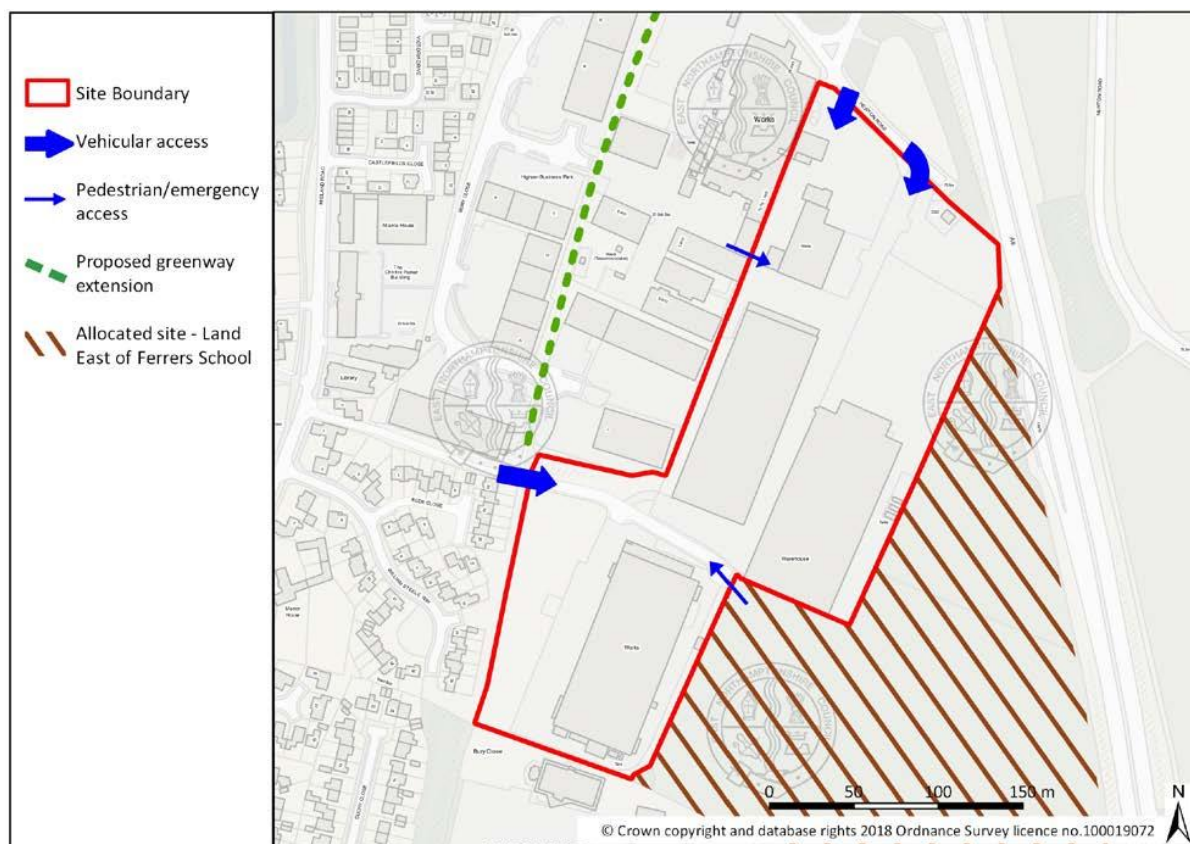


- 10.38 The Employment Land Review (Aspinall Verdi, March 2019)<sup>131</sup> found the premises to be in a poor state of repair; such that these could be better released for residential development. Any such release of the land for residential development should not adversely affect the operational requirements of the more modern industrial units to the west (Aspinall Verdi, paragraph 7.20).
- 10.39 In 2019, Federal Estates Ltd submitted a two part application, for the comprehensive redevelopment of these land holdings in Higham Ferrers, for housing. As part of the same application, it is proposed to relocate existing operations at the northern part of the Federal Estates site (south of Newton Road) to a new “Chelveston Energy Innovation Park”, to the south of the existing Chelveston Renewable Energy Park. The Energy Innovation Park focuses upon low carbon technologies, including energy storage facilities and renewable hydrogen production, with a view to accelerating the growth of zero-carbon/ green industries. Permission for these proposals was granted in November 2020 (reference 19/01781/FUL), subject to S106.
- 10.40 Notwithstanding, concerns were raised through stakeholder engagement regarding the limited options available to provide pedestrian and cycle connections between the allocated housing site (Land east of Ferrers School; Neighbourhood Plan Policy HF.H4) and town centre facilities. If the two vacant warehouses and factory building were released for housing, they could deliver the following benefits:
- Redevelopment of redundant brownfield land;
  - Additional housing land supply within the Higham Ferrers urban area; and
  - Opportunities to improve pedestrian and cycle connections between the allocated housing site to the east of Ferrers School and Higham Ferrers town centre, via Newton Road and/ or the Midland Road/ former Textile Bonding factory link road.
- 10.41 The site has capacity for around 120 dwellings. Appropriate structural landscaping would be required to provide a suitable buffer between the site and adjacent factories (i.e. Woodleys, Bury Close).

---

<sup>131</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11259/190307\\_east\\_northants\\_elr\\_report\\_final](https://www.east-northamptonshire.gov.uk/downloads/file/11259/190307_east_northants_elr_report_final)

**Figure 21: Federal Estates/ former Textile Bonding factory site, Newton Road/ Midland Road, Higham Ferrers**



**Policy EN34: Federal Estates/ former Textile Bonding factory site, Newton Road/ Midland Road, Higham Ferrers**

The vacant Federal Estates/ former Textile Bonding factory sites, as shown on the Policies Map, will be allocated for the development of approximately 120 dwellings. The development should include:

- a) A mix of housing types and tenures to meet local needs, consisting of an appropriate mix of residential properties;
- b) Appropriate development contributions towards education, social, community, public open space and green infrastructure, in accordance with priorities set out in the Local Infrastructure Delivery Plan;
- c) East/ west connections, providing linkages between Ferrers School, the allocated housing land to the east, Moulton College campus and the Rushden East sustainable urban extension, and the town centre;
- d) Provision for vehicular access from Midland Road and Newton Road where these fulfil current highways standards; and
- e) Appropriate mitigation measures to ensure that the amenity of future occupiers is not unacceptably affected by the established businesses at

## Woodley's Yard and Bury Close.

### Irthlingborough

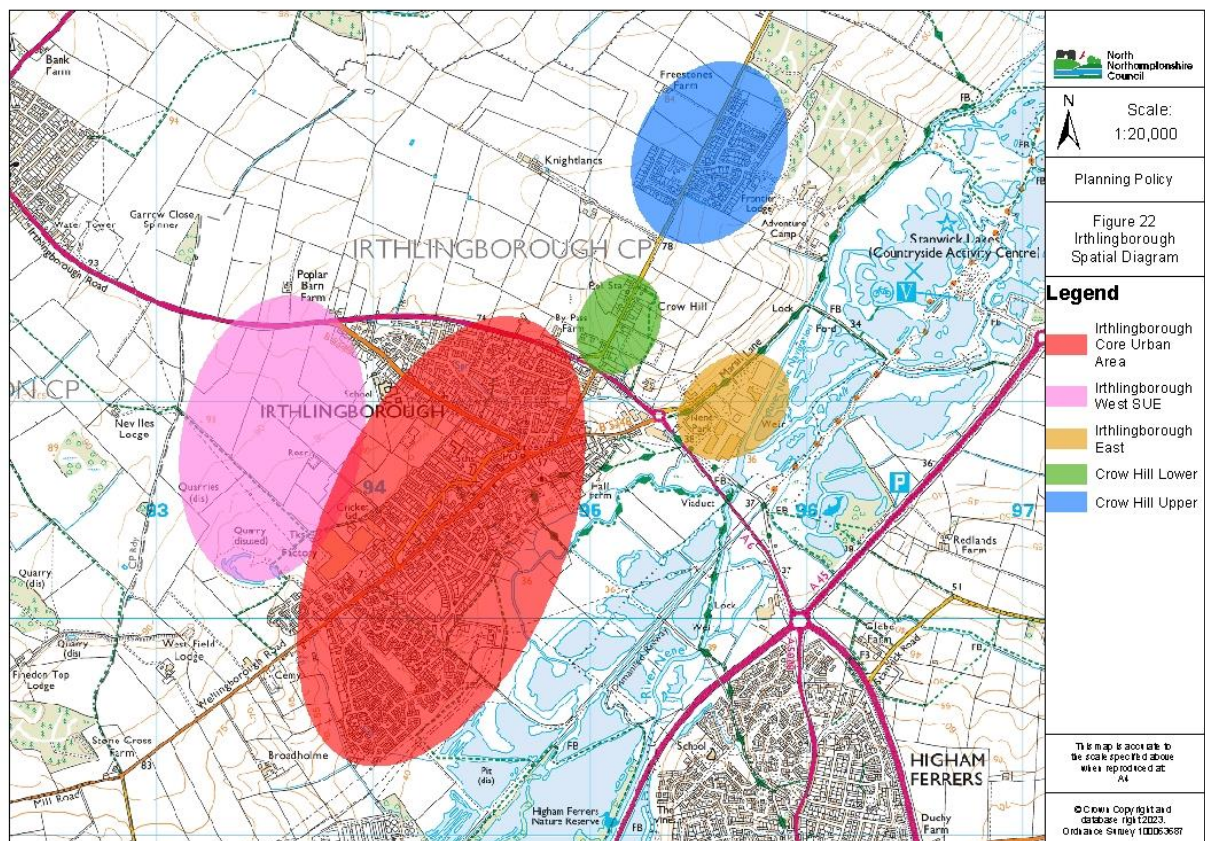
10.42 The Joint Core Strategy (Table 1) defines priorities for Irthlingborough; the regeneration, diversification and expansion of the town's employment and service base. This Plan (Policy EN1(1)(b)) provides further direction, including a focus upon delivering the Irthlingborough West sustainable urban extension. It also identifies the following redevelopment opportunities within the urban area:

- Town centre re-imagination – Former Select & Save, 13-21 High Street/ St Peter's Way Car Park, Irthlingborough; and
- Other brownfield sites – Former Rushden and Diamonds FC Stadium site, Nene Park, Diamond Way, Irthlingborough.

### Spatial character

10.43 Irthlingborough consists of five distinctive spatial parts. Figure 22 and Table 23 (below) outline the main characteristics of each area:

**Figure 22: Irthlingborough Spatial Diagram**



**Table 23: Spatial parts of Irthlingborough**

| Spatial parts of Irthlingborough                   | Characteristics  |
|--|--|
| Core urban area (existing)                         | <ul style="list-style-type: none"> <li>• South of the A6, defined by main arterial routes – Finedon Road, Station Road, Wellingborough Road</li> <li>• Includes key services and facilities – town centre, schools</li> <li>• Hosts main employer – Whitworth</li> </ul>   |
| Irthlingborough West (Sustainable Urban Extension) | <ul style="list-style-type: none"> <li>• Permitted major extension to main urban area</li> <li>• Will enable new Finedon Road (A6) and Wellingborough Road connections</li> </ul>  |
| Irthlingborough East                               | <ul style="list-style-type: none"> <li>• Former principal employment and leisure hub</li> <li>• Separated from main urban area by A6 Bypass</li> <li>• Two main elements – Nene Park (former Rushden &amp; Diamonds FC stadium, south of Diamond Way/ Marsh Lane) and Nene Business Park (mixed use redevelopment site, north of Diamond Way/ Marsh Lane)</li> <li>• Mixed use developments at Nene Business Park site (Attley Way) currently under construction – new food/ convenience retailing, housing</li> </ul> |
| Crow Hill (lower)                                  | <ul style="list-style-type: none"> <li>• Ribbon development along Addington Road</li> <li>• Separated from main urban area by A6 Bypass</li> <li>• Characteristically suburban, but with rural elements e.g. Bypass Farm/ butchers</li> </ul>  |
| Crow Hill (upper)                                  | <ul style="list-style-type: none"> <li>• Secondary/ smaller part of Irthlingborough, with urban character</li> <li>• Separated from main urban area by A6 Bypass and some agricultural fields</li> <li>• Addington Road provides main arterial route</li> <li>• Includes some local services, facilities and businesses – convenience store, community centre, Frontier Centre</li> </ul>  |

10.44 Irthlingborough is a designated Neighbourhood Area, and there is the intention to prepare a Neighbourhood Plan. Preparation is at an early stage and will aim to complement the policies that are set out in this Plan.

10.45 In formulating this Plan, a number of issues affecting Irthlingborough have been identified. These were initially highlighted through the Regulation 18 consultation (January – March 2017) and subsequent stakeholder workshops as follows:



- Securing the successful implementation of the Irthlingborough West sustainable urban extension;
- Making provision for Whitworths' business plans (main employer in the town), enabling the company to remain at Irthlingborough;
- Town centre re-imagination – securing the benefits of the new Market Square/ Church Street Coop etc development and addressing other redevelopment opportunities (e.g. former Select & Save premises, 13-21 High Street and St Peter's Way Car Park); and
- Securing the successful redevelopment of Nene Park (former Rushden & Diamonds FC stadium) site.

10.46 The spatial strategies for the Crow Hill parts of Irthlingborough are set in Policy EN1 of this Plan. This section of the Plan considers what further direction is required to facilitate the redevelopment of significant development sites within Irthlingborough.

#### **Irthlingborough West and Whitworth site**

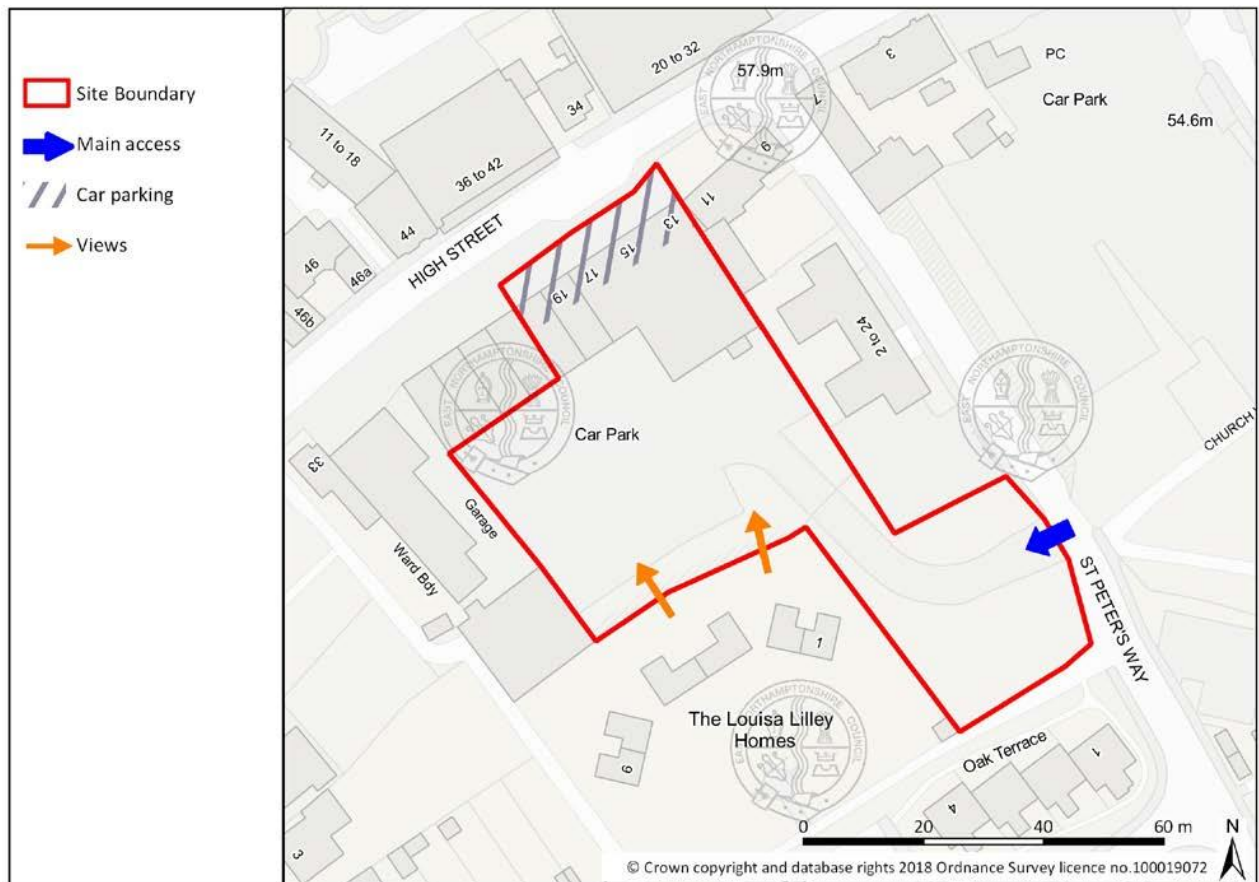
10.47 The Irthlingborough West Sustainable Urban Extension is identified as a strategic commitment in the Joint Core Strategy and the Council will continue to work to promote and support the successful delivery of this. Permission for the comprehensive redevelopment of the adjacent Whitworths food factory site (to the south) for housing was granted in 2010. This has since lapsed and Whitworths has since indicated that it is keen to realign its operations on the current site. Policies EN16 and EN17 (Protected Employment Areas, and relocation and/ or expansion of existing businesses respectively) provide the relevant policy framework for managing future Whitworths' development proposals.

#### **Town centre re-imagination**

10.48 It is anticipated that the recently completed mixed-use redevelopment of the former Express Works Factory site (Coop site) will provide a catalyst for further investment into Irthlingborough town centre and will provide a major new focal point and hub for the town centre. It has been implemented so as to improve the setting of the Market Cross and St Peter's Church, two key heritage assets within the town.

10.49 The former Select & Save building (13-21 High Street) has been vacant for over a decade. It is highlighted as the principal re-imagination opportunity within the town centre. It is proposed that comprehensive redevelopment of the site, be encouraged through this Plan.

**Figure 23: Former Select & Save, 13-21 High Street/ St Peter's Way Car Park, Irthlingborough**



**Policy EN35: Former Select & Save, 13-21 High Street/ St Peter's Way Car Park, Irthlingborough**

The vacant Select & Save and St Peter's Way Car Park site, as shown on the Policies Map, is allocated for redevelopment, proposals should deliver:

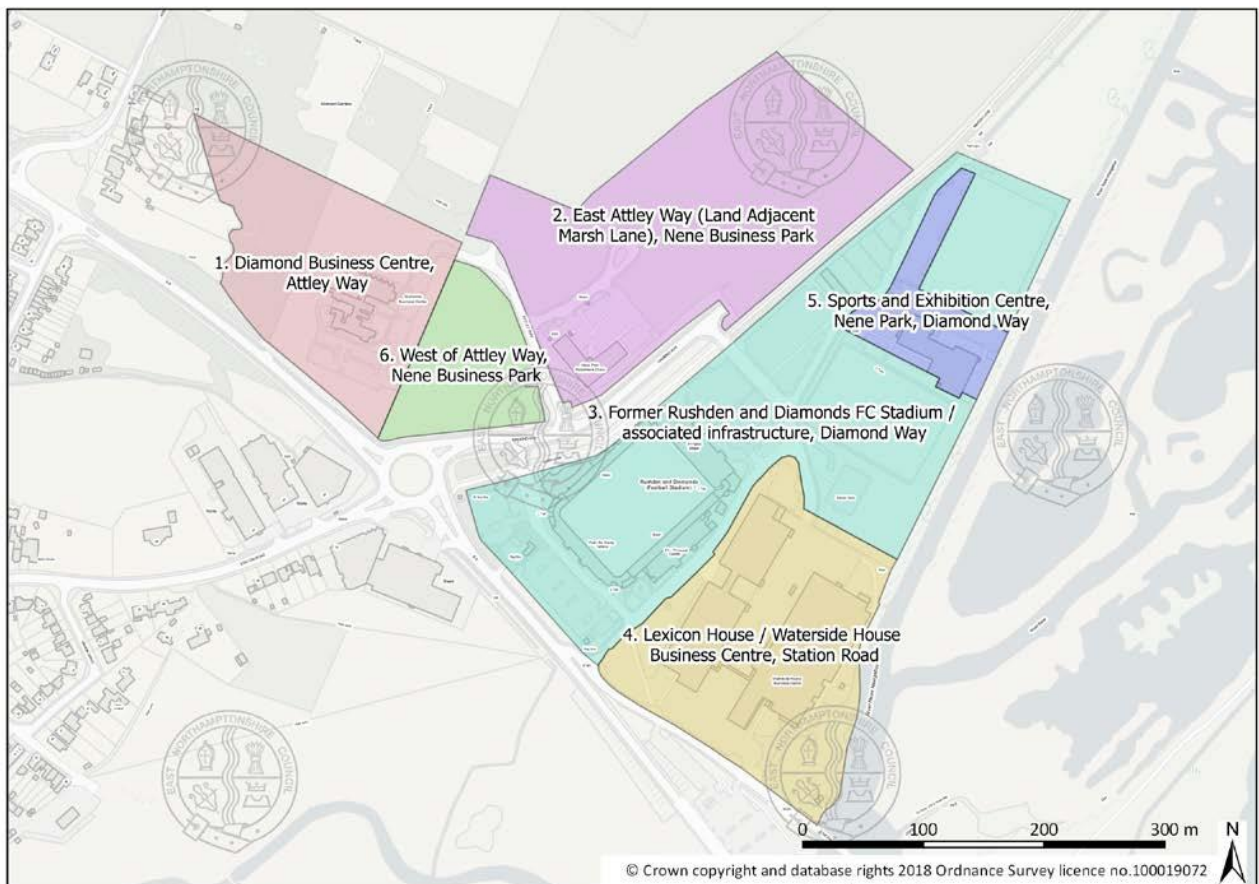
- a) A balance and mix of main town centre uses, including convenience and comparison retailing, financial services and/ or food and drink businesses;
- b) Enhancements to the High Street primary shopping frontage;
- c) Pedestrian connections between the High Street, St Peter's Way and St Peter's Church;
- d) Provision for suitable service arrangements for the new business premises;
- e) Sufficient public car parking;
- f) Opportunities for live-work units at first floor level or above; and
- g) Preservation and enhancement to the settings of heritage assets, with particular reference to St Peter's Church and the Louisa Lilley almshouses.

## Other brownfield sites

10.50 The Irthlingborough East part of the town has long functioned as the main employment and leisure location for the town as a whole. The site has a chequered planning history; further details of which are set out in the Irthlingborough East Background Paper (BP12)<sup>132</sup>. It has hosted a variety of uses and businesses; most notably the former Rushden & Diamonds FC stadium site at Nene Park. The area consists of six distinct parts:

1. Diamond Business Centre, Attley Way (2.9ha);
2. East of Attley Way (Land Adjacent Marsh Lane), Nene Business Park (5.2ha);
3. Former Rushden and Diamonds FC Stadium / associated infrastructure, Diamond Way (7.2ha);
4. Lexicon House/ Waterside House Business Centre, Station Road (3.8ha);
5. Sports and Exhibition Centre, Nene Park, Diamond Way (1.1ha); and
6. West of Attley Way, Nene Business Park (1.20ha).

**Figure 24: Irthlingborough East/ Nene Park**



10.51 Of the Nene Business Park/ Diamond Business Centre (north) parts of the Irthlingborough East area (sites 1, 2 and 6), a new Aldi store opened at the end of 2018 (site 6). Furthermore, detailed permission was granted in 2019 for the

<sup>132</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12113/background\\_paper\\_12\\_-\\_irthlingborough\\_east](https://www.east-northamptonshire.gov.uk/downloads/file/12113/background_paper_12_-_irthlingborough_east)

construction of 88 dwellings East of Attley Way (site 2), with construction now well underway, having started early in 2020.

- 10.52 Sites 4 and 5 are mostly in use. The Waterside House Business Centre includes premises for small business start ups, while the Sports and Exhibition Centre has, since 2012, been used for leisure and office uses, including a gym.
- 10.53 The Former Rushden and Diamonds FC Stadium (site 3, Nene Park), was demolished in 2017. The site was identified as a lapsed site in the Playing Pitch Strategy and Action Plan (PPS) (October 2016). The PPS identified that the site contained three poor quality adult pitches. The PPS recommended that opportunities to bring the site back into use were explored to meet identified shortfalls. However, if this is not feasible or sustainable or disposal is inevitable then the PPS sets out that requirements of NPPF paragraph 99 must be met. The PPS states that this requires replacement provision of an equivalent or better quantity and quality within boundaries of Irthlingborough. The loss of the stadium, playing pitches and ancillary facilities requires suitable mitigation (i.e. alternative provision, unless it can be demonstrated that the facilities are surplus to requirements), in accordance with NPPF paragraph 99. Account should also be taken of the findings of any subsequent Playing Pitch Strategy.
- 10.54 Replacement leisure facilities are anticipated to be developed in accordance with the Healthy and Active Lifestyles Strategy through the masterplans for the major strategic sustainable urban extensions.
- 10.55 The former stadium site, the largest part of Irthlingborough East, is one of the most significant brownfield sites in the Plan area. However, the range of potential uses for site 3 is greatly restricted by a number of development constraints. The majority of the site is situated within the Environment Agency's Flood Zone 3. In most circumstances this precludes all but less vulnerable (to flooding) and water compatible uses; such as most main town centre uses, leisure or general industrial uses. The site is also situated adjacent to the Upper Nene Valley Gravel Pits SPA/ Ramsar site, which will also have significant implications for the range of appropriate uses for the site.
- 10.56 The importance of securing a suitable redevelopment scheme for the Nene Park site (site 3) will form a key part of the future strategy in order to secure investment for Irthlingborough. This Plan will be proactive in allowing for suitable redevelopment proposals, setting out a framework and parameters for the redevelopment of the former Rushden and Diamonds FC Stadium.
- 10.57 The site is located adjacent to the SPA, a site specific HRA is therefore required. The HRA should assess all potential impacts including impacts on surrounding Functionally Linked Land, development proposals should include a Construction Environmental Management Plan and an Access Management Plan which includes details regarding the use of moorings. SuDS will need to be incorporated as part of any redevelopment. Flood risk will need to be fully considered and appropriate mitigation measures delivered, proposals will also need to consider the build-up of contaminants. The impact of climate change over the plan period will need to inform future proposals for the site.



### **Policy EN36: Former Rushden and Diamonds FC Stadium site, Nene Park, Diamond Way, Irthlingborough**

The former Rushden and Diamonds FC Stadium site, as shown on the Policies Map, is allocated for employment use, with an emphasis on business, leisure and tourism use. Proposals should deliver:

- a) Flood compatible employment use such as tourism, cultural or leisure related development in accordance with the current EA flood zone status, complementing the nearby offers of Irthlingborough, Higham Ferrers and Rushden town centres, and Rushden Lakes;
- b) Appropriate flood risk mitigation measures;
- c) Measures to enhance biodiversity, deliver ecosystem services and ensure that any development does not have a significant adverse impact upon the adjacent SPA/ Ramsar site. A site-specific Habitat Regulations Assessment should be provided;
- d) Suitable access and highways arrangements to enable the site to be served by public transport;
- e) Improved arrangements for pedestrian and cyclists, crossing the A6 to Station Road and accessing the town centre (east);
- f) Pedestrian and cycle connections to the East Northamptonshire Greenway, via the Old Bridge and Marsh Lane (west);
- g) Design, height and massing together with high quality landscaping, protecting the setting of nearby heritage assets such as Irthlingborough Bridge and Crow Hill Iron Age Fort;
- h) Provision for new moorings along the River Nene Navigation allowing direct riparian access, and
- i) Mitigate for the loss of the stadium, playing pitches and ancillary facilities, unless it can be demonstrated that the facilities are surplus to requirements in line with paragraph 99 of the NPPF.

### **Oundle**

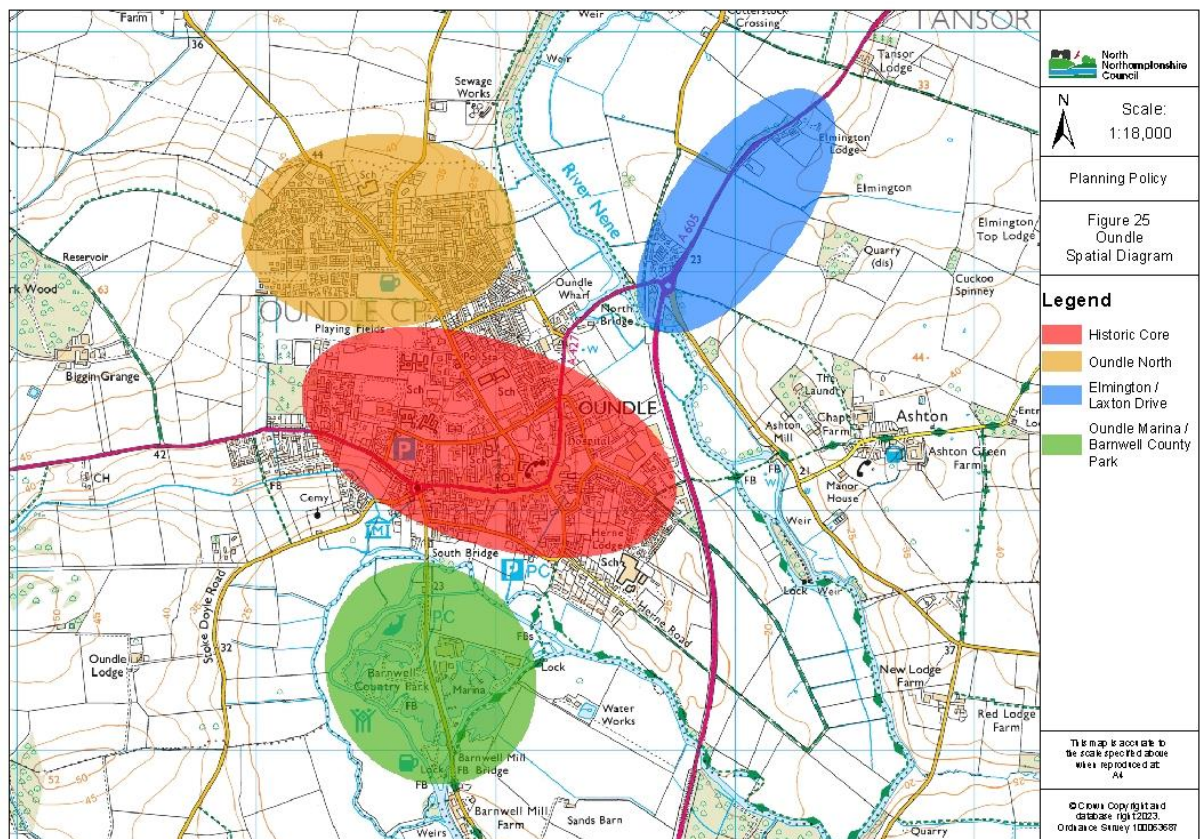
- 10.58 The Joint Core Strategy Policy 11(1)) recognises Oundle's role as the main service centre for the rural north part of the district. This requires that this Plan should focus upon the consolidation and enhancement of this vibrant Market Town.
- 10.59 There is an outstanding requirement for around 300 dwellings during the remainder of the Plan period. This strategic requirement is covered under Housing Delivery (section 8.0). This section of the Plan concentrates on the more detailed (non-strategic) matters affecting Oundle. It focuses upon two potential redevelopment opportunities to the east of the town; the East Road employment area and Riverside Hotel. The latter,

in particular, has been subject to several redevelopment proposals (further details at paragraphs 10.66-10.68, below).

### Spatial character

10.60 Oundle and its surrounding rural hinterland consist of four distinctive spatial parts, plus the closely connected villages of Ashton, Barnwell, Cotterstock, Glaphorn and Stoke Doyle. Figure 25 and Table 24 (below) outline the main characteristics of each. The Oundle built up area includes parts that are situated within the parishes of Ashton (Elmington; Laxton Drive), Barnwell (Barnwell Mill; Barnwell Country Park; Oundle Marina) and Glaphorn (Old Farm Lane) parishes.

**Figure 25: Oundle Spatial Diagram**



**Table 24: Spatial parts of Oundle**

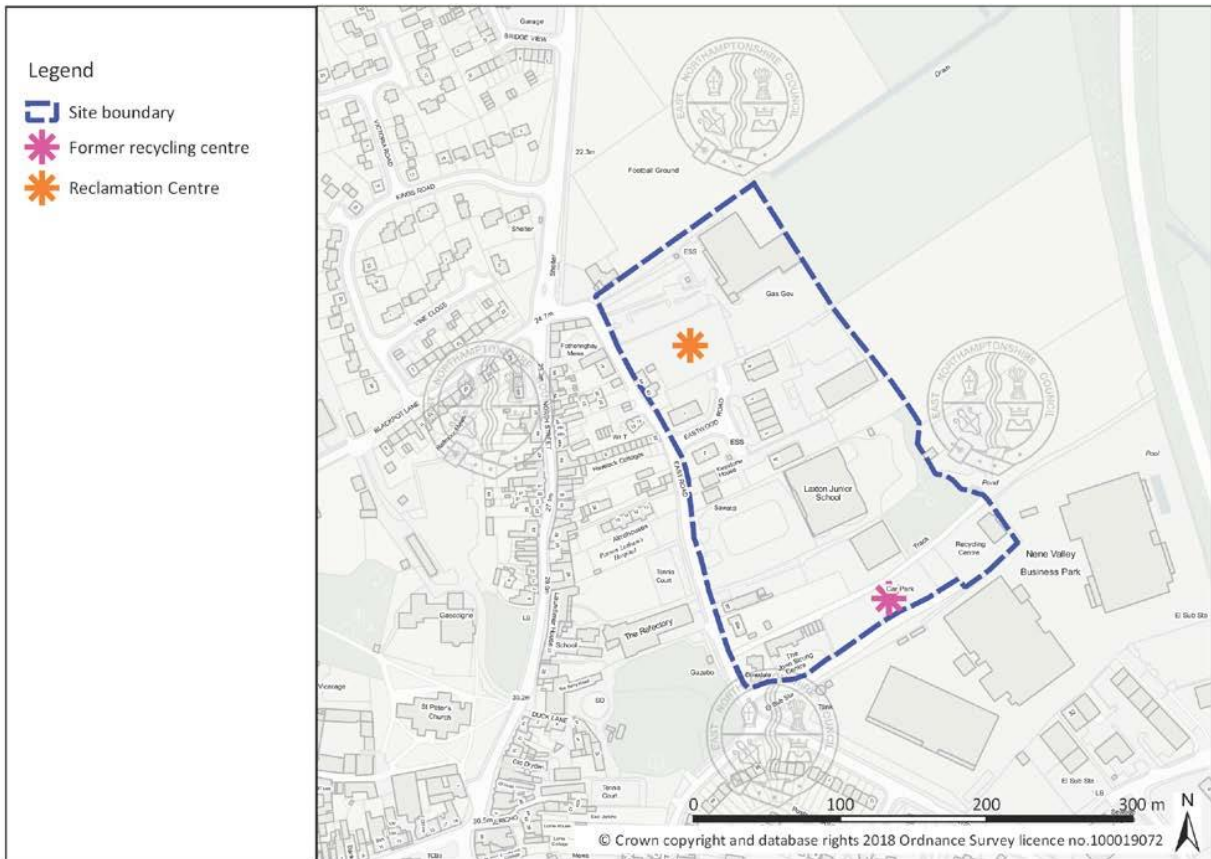
| Spatial parts of Oundle | Characteristics   |
|-------------------------|---|
| Historic core           | <ul style="list-style-type: none"> <li>Defined by West Street and North Street; the Market Place which links them and New Street (A427)</li> <li>Includes key services and facilities – town centre</li> <li>Historic character defined by Oundle School</li> <li>Main employment areas situated to the east of the historic core of the town– Nene Business Park/ Fairline Boats; East Road</li> </ul> |

| Spatial parts of Oundle                 | Characteristics  |
|---|--|
| Oundle north                            | <ul style="list-style-type: none"> <li>• Suburban urban extension, north of New Road, focused upon arterial Glapthorn Road/ Cotterstock Road</li> <li>• Developed since 1950s</li> <li>• Focal points – Oundle Primary School, Occupation Road playing fields</li> <li>• Potential for expansion of urban area to the north (Oundle/ Glapthorn Parish), but recognise concerns regarding potential coalescence with Glapthorn</li> </ul> |
| Oundle Marina/ Barnwell Country Park    | <ul style="list-style-type: none"> <li>• Significant tourism and leisure hub</li> <li>• Separated from main urban area by River Nene</li> <li>• Majority of area is functional floodplain</li> <li>• Committed redevelopment proposal – Oundle Marina</li> <li>• Further opportunities e.g. Barnwell Mill</li> </ul>   |
| Elmington/ Laxton Drive (Ashton Parish) | <ul style="list-style-type: none"> <li>• Ribbon development along A605</li> <li>• Separated from main urban area by A605 Bypass</li> <li>• Suburban element (Laxton Drive)</li> <li>• Riverside Hotel presents redevelopment challenge</li> </ul>  |

10.61 The Glapthorn Neighbourhood Plan, has implications for the northern part of the Oundle urban area. Accordingly, a number of issues affecting Oundle were identified in formulating this Neighbourhood Plan. These were also highlighted through the Regulation 18 consultation (January – March 2017), subsequent stakeholder workshops and/ or the Glapthorn Neighbourhood Plan consultation as follows:

- Delivery of the outstanding strategic housing requirements;
- East Road employment areas – further development opportunities at Reclamation Centre, Eastwood Road, and Former Recycling Centre/ Council Car Park (Herne Park), East Road; and
- Delivering redevelopment of the Riverside Hotel.

**Figure 26: Oundle – key redevelopment opportunities**



**East Road employment areas**

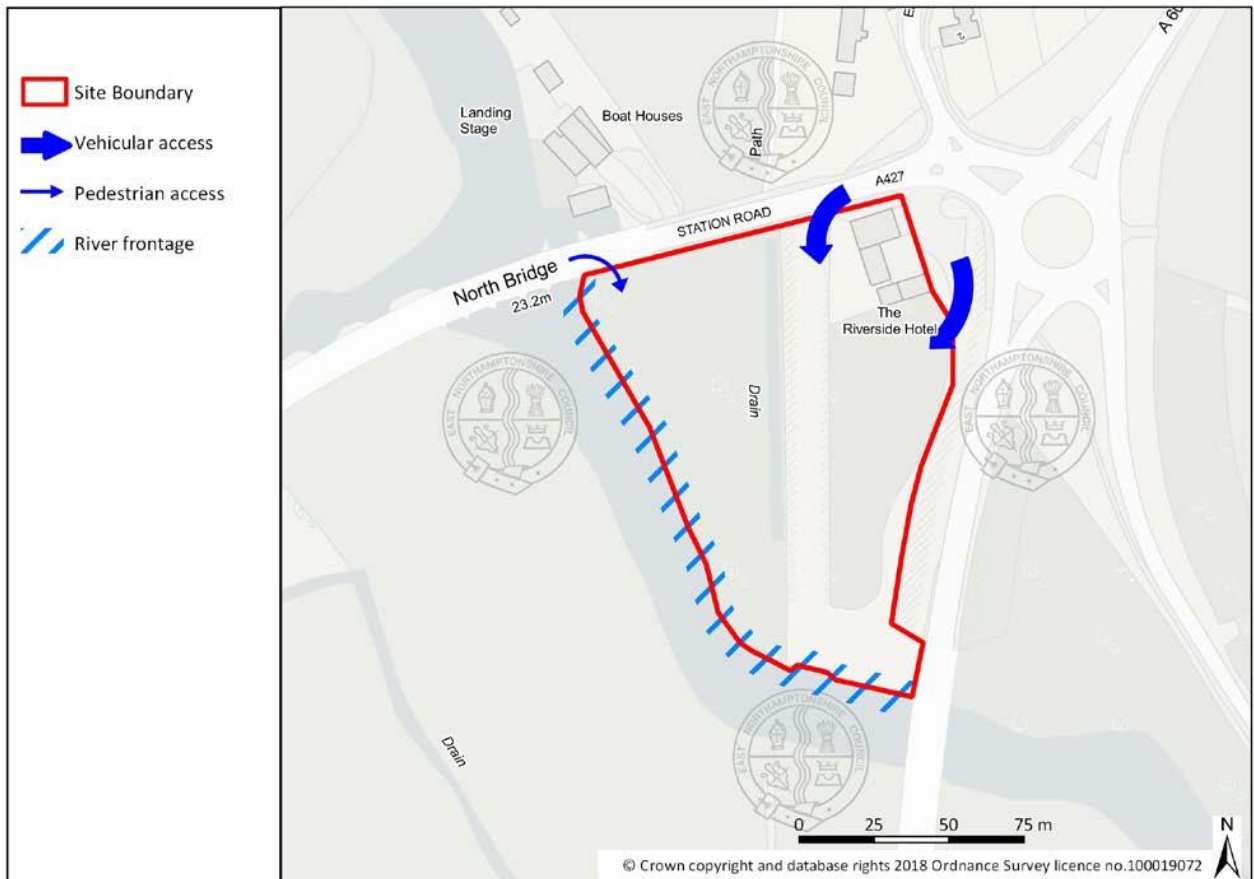
- 10.62 Two potential redevelopment opportunities to the east of East Road were identified during the stakeholder workshops. The stone reclamation centre, adjacent to Waitrose (opened 2013) is a long established business. There are no current proposals to relocate the current business, or release the site for redevelopment.
- 10.63 The former recycling centre and car park adjacent to the Joan Strong Centre has undergone some changes in recent years. The former recycling centre was occupied by North Equipment Ltd in 2016, while the adjacent Herne Park car park is well used on most working days, particularly market days.
- 10.64 The recycling centre and car park are brownfield urban sites, but neither is currently available. If either site becomes available in the longer term, any potential redevelopment scheme could be informed by a development brief, alongside other Local Plan policies, including the spatial strategy (Policy EN1(1)(c) and Joint Core Strategy Policy 11(1)(b)), together with other relevant development management policies (e.g. Joint Core Strategy Policy 6 – Development on Brownfield Land). In the short/ medium term, Oundle Town Council has taken over the lease of the East Road/ Herne Park car park and is keen to retain this as an asset for the town.

**Riverside Hotel**



- 10.65 The Riverside Hotel forms a main gateway to Oundle (although it is located in the Parish of Ashton). It is a non-designated heritage asset, having been constructed in the 1840s as a hotel to serve the former Oundle railway station, and is sited adjacent to the Grade II listed Oundle town bridge and the River Nene.
- 10.66 Outline planning permission for the development of a new hotel at the Riverside was granted in 2005 (reserved matters approved in 2011), incorporating the existing buildings into a larger new hotel complex. This permission remains “live”, as implementation of this consent was subsequently commenced. Notwithstanding, the majority of the site is situated within EA Flood Zone 3 and much of it is identified by the Local Wildlife Trust as a local wildlife site. These factors represent significant challenges to delivering the consented scheme.
- 10.67 The previous Local Plan policy expressed a preference for the reinstatement of the Riverside Hotel as a restaurant, pub or hotel. It also identified potential alternative uses for the site, such as a resource centre, training facility, offices, or businesses uses. The following policy is proposed to guide future proposals in delivering a successful redevelopment of the site:

**Figure 27: Riverside Hotel, Station Road, Oundle**



## **Policy EN37: Riverside Hotel, Station Road, Oundle**

**Redevelopment proposals for the former Riverside Hotel, as allocated on the Policies Map, will be supported for the following uses:**

- **Reinstatement as a restaurant, public house, hotel or tourist accommodation;**
- **Training facility and/ or resource centre; or**
- **Small business units, or other potential service employment uses.**

**Redevelopment schemes should deliver the following outcomes:**

- a) Preservation and enhancement of the heritage asset;**
- b) Appropriate flood mitigation measures, including appropriate access and egress arrangements;**
- c) Provision for new moorings along the River Nene Navigation with direct riparian access; and**
- d) Improved connectivity for pedestrian and cyclists, to the town centre (east, via North Bridge) and riverside paths.**

### **Raunds**

10.68 The Joint Core Strategy (Table 1) defines priorities for Raunds; the regeneration, diversification and expansion of the town's employment and service base. Further direction is provided in Policy EN1(1)(b) of this Plan. The Raunds Neighbourhood Plan (made November 2017) provides additional local detail relating to the following:

- Housing – design, mix and car parking standards;
- Open space – protection of existing areas and standards for providing new open spaces in association with new developments;
- Local Green Space;
- Protection and enhancement of community facilities;
- Town centre re-imagination – mix of uses, shopping frontages, public realm, creating safer streets for pedestrians and cyclists;
- Employment – protecting existing areas, supporting new proposals and supporting tourism and the visitor economy;
- Natural and built environment – Green infrastructure (e.g. tree planting), locally listed buildings (non-designated heritage assets) and protection of Upper Nene Valley Gravel Pits SPA/ SSSI, while supporting enhanced connectivity to the Nene Valley.

10.69 The Neighbourhood Plan also sets out a detailed vision for the town; emphasising the importance of a regenerated town centre, with aspirations to become a vibrant market town, with a variety of artisan and boutique style shops. Policies focus upon managing the existing range of town centre uses, although the Neighbourhood Plan does not

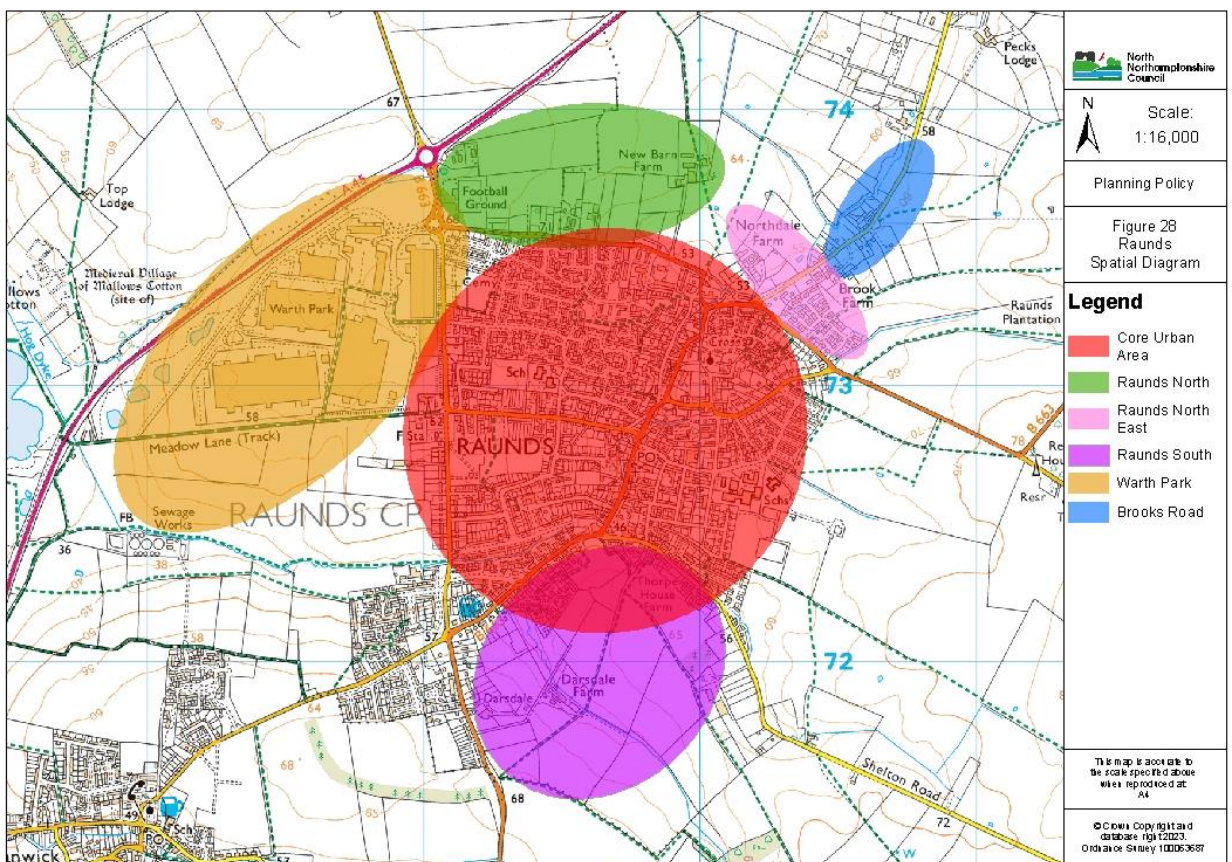
include any site specific proposals, with the exception of policies for the protection of existing functions.

10.70 In developing the Plan, further stakeholder views were sought through the Member and Town/ Parish Council workshops. The workshops provided an opportunity for stakeholders to identify any other matters that the Neighbourhood Plan did not cover and are highlighted below (paragraph 10.73).

**Spatial character**

10.71 The Raunds urban area consists of six distinctive spatial parts, plus the closely connected village of Stanwick. Figure 28 and Table 25 (below) outline the main characteristics of each.

**Figure 28: Raunds Spatial Diagram**



**Table 25 Spatial parts of Raunds**

| Spatial parts of Raunds | Characteristics   |
|-------------------------|---|
| Core urban area         | <ul style="list-style-type: none"> <li>Defined by London Road (west), Brick Kiln Road (north) and High Street/ Brook Street</li> <li>Includes key services and facilities – linear town centre, focused on The Square/ Brook Street</li> <li>Historic character defined by St Peter’s Church</li> </ul> |

|                             |  |
|-----------------------------|--|
|                             | <ul style="list-style-type: none"> <li>• Hosts significant suburban areas to the east and west of High Street/ Brook Street</li> </ul>   |
| Raunds north                | <ul style="list-style-type: none"> <li>• Sustainable urban extension to the north of Brick Kiln Road (also known as Border Park)</li> <li>• Developed since 2013</li> <li>• Focal points – Raunds Town FC, new London Road/ Michael Way local centre/ service hub adjacent to A45</li> <li>• Potential for further expansion of urban area to the east of Border Park</li> </ul>     |
| Raunds north east           | <ul style="list-style-type: none"> <li>• Sustainable urban extension to north east of existing urban area, known as Northdale End</li> <li>• Significant new green infrastructure corridor adjacent to Brooks Road, utilising Hog Dyke</li> </ul>  |
| Raunds south                | <ul style="list-style-type: none"> <li>• Sustainable urban extension to the south of the town</li> <li>• Two significant developments to south of Grove Street – Weighbridge Way (developed during 2000s) and Willow Way (2010/11)</li> <li>• Major development at Darcy Park (also known as Darsdale Farm) recently started, including significant new public open space</li> </ul> |
| Warth Park (west of Raunds) | <ul style="list-style-type: none"> <li>• Main employment area of Raunds</li> <li>• Major strategic warehousing and distribution site</li> <li>• Also includes significant new green infrastructure between warehouses and A45</li> </ul>   |
| Brooks Road                 | <ul style="list-style-type: none"> <li>• Ribbon development along Brooks Road, beyond Northdale End</li> <li>• Suburban character</li> <li>• Transition between urban (Northdale End) and rural (Brook Farm Livery Stables)</li> </ul>   |

10.72 In formulating this Plan and the Neighbourhood Plan, a number of issues affecting Raunds have been identified as follows:

- Retention of existing community facilities and securing improvements to health facilities;
- Employment – need to encourage more small and medium enterprises;
- Town centre re-imagination – overall enhancements to town centre – opportunities identified, including The Spinney, Brook Street and library (High Street) if vacated – town centre “gateway” sites;
- Other opportunities – Fire/ Police Station, if these are relocated and land south of Marshall Road.

10.73 In nearly all cases, the issues identified through the 2017/18 workshop events are specifically addressed by one or more Neighbourhood Plan policies. Identified community facilities (including the library) are protected by Policy 7 of the Joint Core



Strategy and Policy R8 of the Neighbourhood Plan. No significant redevelopment opportunities within the main urban area were raised.

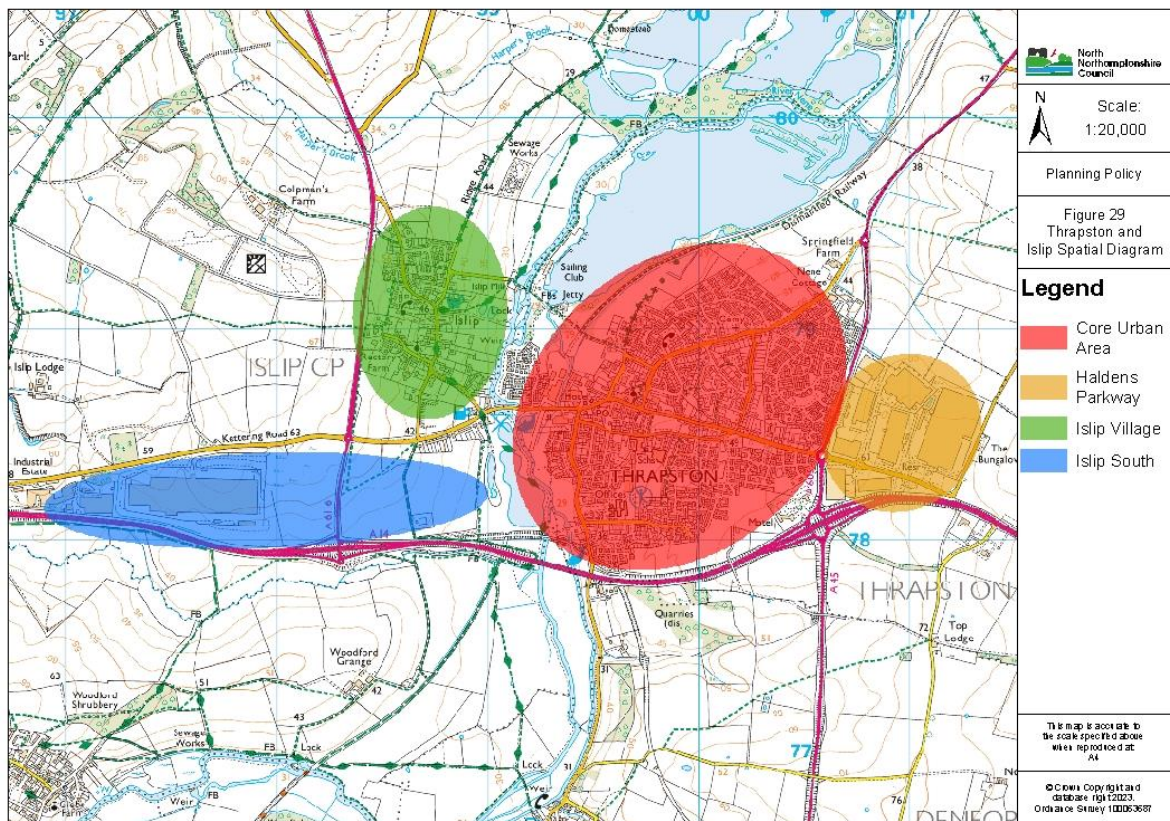
## Thrapston

10.74 The Joint Core Strategy (Table 1) defines priorities for Thrapston; the regeneration, diversification and expansion of the town's employment and service base. This Plan (Policy EN1(1)(b)) provides further direction, recognising that significant growth has been delivered at Thrapston South, through the previous Local Plan.

## Spatial character

10.75 The Thrapston urban area consists of two distinctive spatial parts, with a further two distinctive spatial elements at Islip, to the west of the River Nene. Figure 29 and Table 26 (below) outline the main characteristics of each:

**Figure 29: Thrapston and Islip Spatial Diagram**



**Table 26: Spatial parts of Thrapston and Islip**

| Spatial parts of Thrapston and Islip | Characteristics  |
|--------------------------------------|--|
| Core urban area                      | <ul style="list-style-type: none"> <li>Defined by radial arterial roads – High Street/ Huntingdon Road, Midland Road and Oundle Road</li> <li>Historic core based around High Street/ Huntingdon Road and Midland Road, with post-war suburban development to the north (Oundle</li> </ul> |

|                                   |   |
|-----------------------------------|---|
|                                   | <p>Road, Lazy Acre)</p> <ul style="list-style-type: none"> <li>• Includes key services and facilities – town centre retailing, school, main public open spaces, leisure centre</li> </ul>   |
| Haldens Parkway (employment area) | <ul style="list-style-type: none"> <li>• Main employment area of Thrapston, east of A605</li> <li>• Major strategic warehousing and distribution site, with access to A14 and A45 Trunk Roads</li> <li>• Scope for further expansion of logistics or warehousing businesses, if necessary</li> </ul>  |
| Islip village                     | <ul style="list-style-type: none"> <li>• Self contained village, with a range of services but a close functional relationship with Thrapston</li> <li>• Linear village, defined by Lowick Road, High Street and Chapel Hill/ Toll Bar Road</li> </ul>   |
| Islip south                       | <ul style="list-style-type: none"> <li>• Linear area, west of River Nene, situated between Kettering Road and A14</li> <li>• Major strategic employment site, including Islip Furnace and Primark premises</li> <li>• Linear/ ribbon development part of Islip village to the south of Kettering Road, separated from Islip village by cricket field/ Woolpack pub</li> </ul> |

10.77 Thrapston is not a designated a Neighbourhood Area. Given that at present there are no moves to prepare a Neighbourhood Plan, feedback from the Local Plan Workshops (May 2017 – April 2018) has been used to inform the Thrapston town strategy in this Plan.

10.78 The close functional relationship between Thrapston and Islip, to the west of the River Nene, is recognised. Islip is defined as rural in other strategic policies (EN1) in order to address any concerns about coalescence of settlements.

10.79 In formulating this Plan, a number of issues affecting Thrapston have been identified as follows:

- Potential for enhanced green infrastructure, sport and recreational facilities in the Meadow Lane/ Thrapston Lakes area;
- Improved connections to the East Northamptonshire Greenway, via Islip;
- Town Centre – future of existing services e.g. library, former Barclay’s Bank (closed October 2018); and the range and offer of town centre businesses;
- Various redevelopment/ re-imagination opportunities around the town.

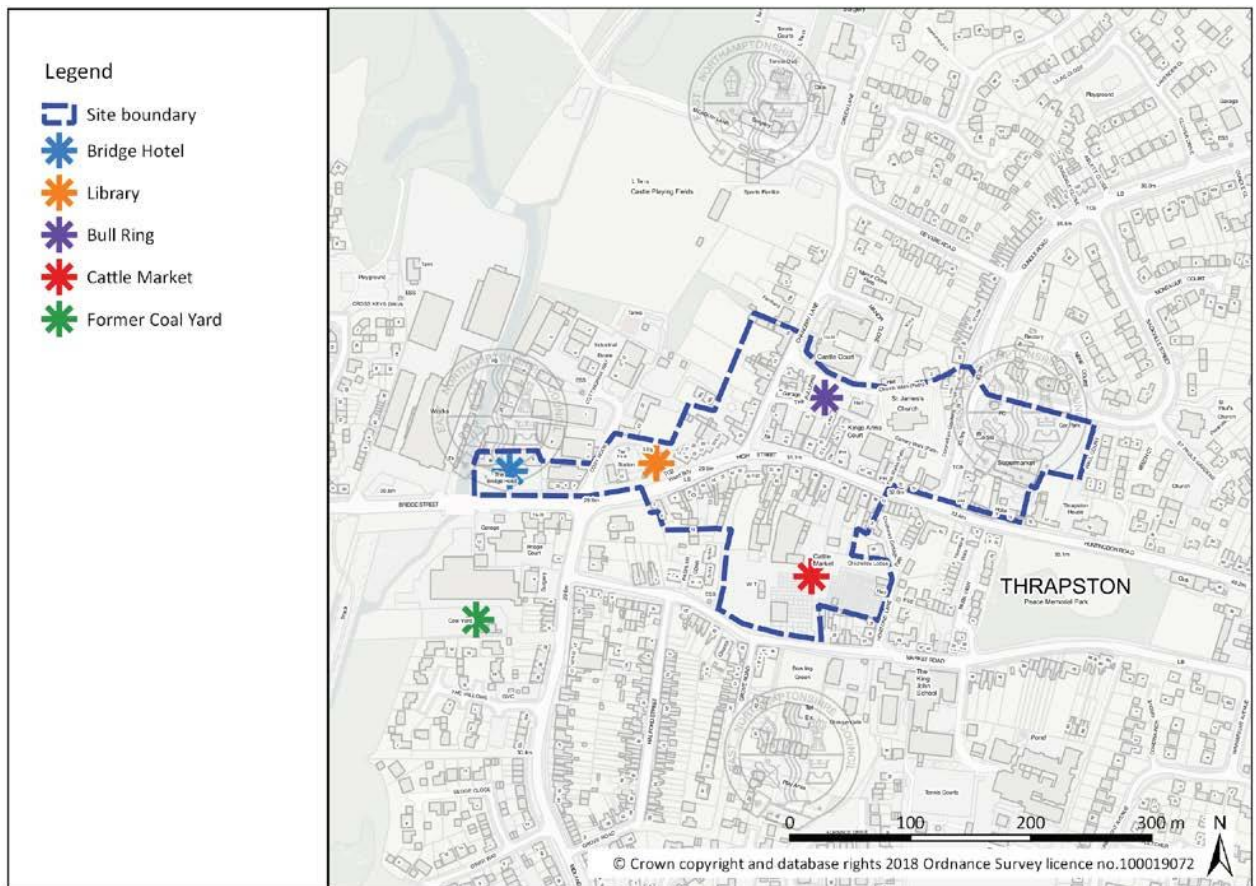
10.80 The previous Local Plan set out detailed policies for the regeneration of Thrapston, including overall principles and site specific proposals based on a 2003 Masterplan for the town, which advocated wholesale redevelopment of certain sites around the town centre.

10.81 The concept of comprehensive redevelopment has been largely replaced by an incremental approach to the re-imagination of town centres, advocated in the current Economic Strategy. Site specific allocations are proposed where these are considered desirable. Elsewhere, development principles are set out to inform future proposals.

## **Town centre re-imagination**

- 10.82 This Plan sets out guiding principles, to provide a framework for the re-imagination of Thrapston town centre. Previous Local Plan regeneration policies have been reviewed and incorporated into the town centre re-imagination guiding principles (Policy EN30, above).
- 10.83 Two deliverable sites, within the town centre, are recognised as having the potential to deliver significant opportunities to enhance Thrapston's vitality. Planning permission for the conversion of the listed 71-75 High Street and associated outbuildings for retail, office and residential uses was granted in 2014. The scheme was implemented from 2015, with the residential aspects of the scheme being followed by the occupation of the retail unit in 2020. This was in spite of the economic impacts of the Covid-19 pandemic, particularly for the retail sector.
- 10.84 In October 2018, Barclay's closed its Thrapston branch (41 High Street), the last bank in the town. Like the listed 71-75 High Street, this is a landmark (albeit non-designated) heritage asset at the junction of Chancery Lane and the High Street. During 2020, permission was granted for the change of use of the former bank to a mixed use residential and retail development (reference 20/00289/FUL). Implementation of this commenced during 2020.
- 10.85 Otherwise, there are no deliverable (i.e. short term), site specific opportunities anticipated to further progress the revitalisation of Thrapston town centre. Nevertheless, several potential opportunities were identified through the 2017/18 Member and Town/ Parish Council workshops:
- Cattle Market, Market Road;
  - Chancery Lane/ Bull Ring (Chancery Autos/ St John Ambulance);
  - 17-31 High Street/ Library
  - Bridge Hotel/ Scotts, Bridge Street;
  - Former Coal Yard, Midland Road.

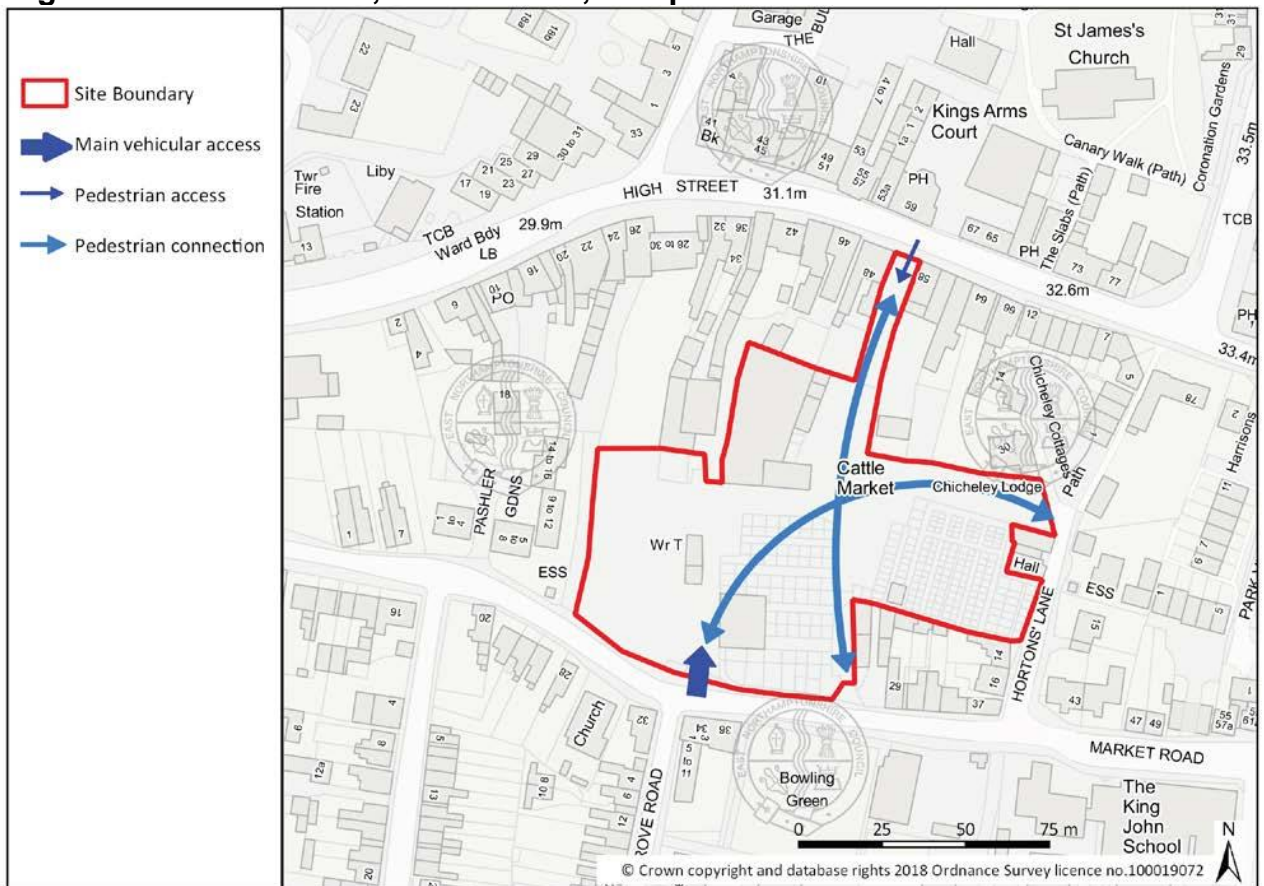
**Figure 30: Thrapston Town Centre redevelopment opportunities**



- 10.86 While none of these sites are available in the short term, in most cases these were recognised in previous Local Plan regeneration policies. Sites such as the Bull Ring, 17-31 High Street, the Bridge Hotel and Scotts may become available in the medium to long term, but there no certainty of this.
- 10.87 Permission was granted in 2012 for the relocation of the Cattle Market from its existing Market Road site (where it has been situated since the 1870s), to a new site at Titchmarsh Lane, north of Haldens Parkway. In order to guide and support the release of the current site for redevelopment, Policy EN38 together with Figure 30 (above) identifies overarching principles that will guide future development proposals as/ when any of these sites becomes available.
- 10.88 The site is located approximately 500m from the SPA, depending on the type of development proposed a Habitat Regulations Assessment may be required to accompany any planning application.



**Figure 31: Cattle Market, Market Road, Thrapston**



**Policy EN38: Cattle Market, Market Road, Thrapston**

The Cattle Market site, as shown on the Policies Map, is allocated for redevelopment, with a focus upon maintaining an appropriate mix and range of uses compatible with the town centre. Redevelopment proposals should deliver:

- a) A balance and mix of town centre uses, including convenience retailing, financial services and/ or food and drink businesses;
- b) Opening up of a new north-south active town centre frontage to the south of the High Street;
- c) Enhanced north-south pedestrian connectivity, between the High Street, Market Road, Grove Road and the Leisure Centre (Cedar Drive);
- d) Vehicular access from Market Road, with off-site improvements to the Midland Road junction, and provision for suitable service arrangements for the new business premises;
- e) Opportunities for residential uses appropriate for a town centre site, including live-work units or specialist housing at first floor level or above;
- f) Preservation and enhancement to the settings of adjacent heritage assets, non-designated heritage assets and the Conservation Area; and
- g) Additional town centre public car parking.

## 11.0 Monitoring and implementation

- 11.0 In order to measure the effectiveness of the Local Plan Part 2, this needs to be underpinned by an effective monitoring and implementation framework. The Joint Core Strategy sets out a detailed range of monitoring indicators. It highlights the key infrastructure needed to secure implementation of these strategic policies (Joint Core Strategy, Table 8), identified in the Infrastructure Delivery Plan (IDP).
- 11.1 The Joint Core Strategy (Policy 10) provides the overarching development plan mechanism for securing planning obligations. This forms the strategic policy, by which delivery of IDP projects can be facilitated through the planning system (development contributions).

### Key infrastructure projects

- 11.2 This Plan, which provides additional detail to support the strategic policies of the Joint Core Strategy, will be supported by the strategic infrastructure identified within the IDP, together with additional more localised infrastructure where a local need has been identified. Key infrastructure within the district – that which is expected to be delivered within the Plan period – is noted as follows:
- Chowns Mill roundabout improvements, A45/ A6 Higham Ferrers/ Rushden;
  - Corby Northern Orbital Road Phase 2 (Final);
  - A45 Stanwick to Thrapston dualling;
  - Ditchford Lane/ Rushden Lakes link road;
  - Tresham Garden Village – A43 link road, with secondary A427 access; and
  - Greenway extensions.
- 11.3 The topic and area based workshops for the Plan (2017-18) and subsequent draft Plan consultation (November 2018 – February 2019) and subsequent Regulation 19 draft submission Plan consultation (2019) identified various localised infrastructure priorities, over and above the strategic projects as identified above:
- Enhancements and improvements to key urban spaces; e.g. town squares and other meeting points;
  - Libraries – sustainable future arrangements;
  - Education – delivery of new academies/ free schools, working with the Department for Education in accordance with current local education authority<sup>133</sup> and national policies<sup>134</sup>;
  - Fire and rescue - depending on the scale and nature of the proposed development and resulting demands on fire and rescue resources, delivery of new types of fleet (e.g. smaller 'rapid response' initial intervention vehicles)/ new

---

Northamptonshire Organisation Plan for School Places 2018 – 2023:

[https://www.whatdotheyknow.com/request/670920/response/1598950/attach/4/2018%20Update%20School%20Or%20organisation%20Plan%20DRAFT%20v2.pdf?cookie\\_passthrough=1](https://www.whatdotheyknow.com/request/670920/response/1598950/attach/4/2018%20Update%20School%20Or%20organisation%20Plan%20DRAFT%20v2.pdf?cookie_passthrough=1)

<sup>134</sup> Planning for Schools Development (2011):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6316/1966097.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf) Securing developer contributions for Education (November 2019):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/909908/Developer\\_Contributions\\_Guidance\\_update\\_Nov2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909908/Developer_Contributions_Guidance_update_Nov2019.pdf)

---

bays to existing fire stations to accommodate additional vehicles/relocation or provision of new response facilities/ introduction of new types of equipment and a reduction of risk and demand through the provision of fire suppression systems (sprinklers) in appropriate developments;

- Development of multi-functional community/ healthcare hubs;
- Expansions to capacity of existing sport, recreational and leisure facilities;
- Green Infrastructure enhancements (detailed evidence underpins section 5.0, Natural Capital, above);
- Replacement/ alternative arrangements to compensate loss of financial services (e.g. bank branches, ATMs and/ or Post Office counters).

11.4 The IDP is reviewed annually, through the Authorities' Monitoring Report. In order to supplement the evidence base for this Plan, a district-level Local Infrastructure Plan (review of the IDP) has been prepared. This identifies amendments and updates to infrastructure projects identified in the most recent (2017) full IDP, together with potential new infrastructure needs which have arisen over the past two years.

### **Developer contributions**

11.5 The current system for securing developer contributions operates under provisions set by the 2010 Community Infrastructure Levy (CIL) Regulations, as amended<sup>135</sup>. Although none of the North Northamptonshire local authorities (including East Northamptonshire Council) has introduced CIL, the securing of section (S) 106 developer contributions and/ or planning obligations is nevertheless directed by the CIL Regulations.

11.6 S106 contributions, unlike CIL payments (which take the form of tariff payments), are directly related to individual planning permissions. The CIL Regulations specifically define the scope of "planning obligations" (s106 agreements). These require that S106 planning obligations must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

11.7 Only in the event that all of these tests are "passed" in respect of an individual development scheme can S106 contributions be sought. These are negotiable through the development management process. That is, contributions may be reduced where it can be objectively demonstrated that these would undermine development viability. Notwithstanding, development contributions tend to be negotiated in accordance with the County Council's adopted policies<sup>136</sup>.

11.8 Since the introduction of the CIL in 2010, the Government has consistently reviewed how this legislation should operate in practice. Several amendments to the Regulations have been continuously made over the past decade; most recently in response to the 2020 Covid-19 pandemic. The Government has proposed the

---

<sup>135</sup> <https://www.legislation.gov.uk/primary+secondary?title=community%20infrastructure%20levy>

<sup>136</sup> Creating Sustainable Communities: Planning obligations framework and guidance (January 2015): <https://www3.northamptonshire.gov.uk/councilservices/environment-and-planning/Documents/Creating%20Sustainable%20Communities%20Jan%202015%20FINAL.pdf>

replacement of CIL and S106 by a simplified national infrastructure levy in the “Planning for the Future” White Paper<sup>137</sup>, but it is anticipated that any such changes would be introduced by way of primary legislation; implemented in the longer term by the new unitary North Northamptonshire Council, in parallel with a review of the Joint Core Strategy (Local Plan Part 1).

## **Monitoring the Local Plan Part 2**

11.9 The Joint Core Strategy provides an extensive monitoring framework with a comprehensive set of performance indicators and targets. The monitoring indicators within this Plan should be reviewed in conjunction with those in Table 9 of the Joint Core Strategy. Critical elements of this Plan which will be monitored include:

- Housing completions by location; at each town and within the rural areas;
- Delivery of main town centre uses by location – town centres, local centres, edge of centres and out of centre locations;
- Delivery of priority green infrastructure corridors, extensions to the Greenway and enhancements to the quality of public open space, sport and recreation facilities;
- Delivery of improvements to heritage assets, and the tourism and cultural offer of the district;
- Delivery of jobs and implementation of economic development projects such as the Enterprise Centre;
- Implementation of housing land allocations to deliver the residual housing requirements; and
- Delivery of regeneration priorities for the six towns.

11.10 If monitoring identifies that a policy is not achieving its objectives, key policy targets are not being met or the context has changed (for example, the performance and nature of the economy), the Council will take remedial action, working with North Northamptonshire partners. This may include:

- Identifying the reasons for under-performance against targets and discussing with partners and stakeholders;
- Reviewing the evidence base for availability and deliverability of housing/ employment land, through the framework of the Authorities’ Monitoring Report (AMR);
- Working with developers and landowners of existing committed or allocated sites to produce viable and suitable schemes;
- Seeking to identify additional sources of finance or alternative programmes for the delivery of infrastructure;
- Discuss with partners and service providers potential solutions to better address issues within the design of schemes.

11.11 This Plan will be implemented in conjunction with the broader strategic framework set out in the Joint Core Strategy. If the various actions fail to realign delivery of outputs and outcomes then it may be necessary to consider a review of targets, consider changes to the allocation of employment/ housing land, or consider a review of this Plan/ Joint Core Strategy. Where necessary to aid implementation, Supplementary

---

<sup>137</sup> <https://www.gov.uk/government/consultations/planning-for-the-future>



Planning Documents, masterplans or further guidance may be produced to provide further detail on specific policy areas.

- 11.12 The AMR will report on the extent to which policies set out in the Local Plan are being achieved and targets are being met. As well as linking with spatial outcomes and policies, indicators in the AMR also link to the Sustainability Appraisal objectives in order to identify the significant effects of policy implementation.
- 11.13 The Joint Core Strategy contains strategic direction with regard to development contributions. This direction is set out in Policies 7 and 10.

| <b>Table 27: Performance indicators and targets for monitoring</b> |   |   |   |  |
|--|---|---|---|--|
| <b>Policy</b>  | <b>Objective</b>  | <b>Indicator</b>  | <b>Aims</b>   | <b>Targets</b>   |
| EN1  | Provide additional rural spatial direction/ settlement hierarchy (i.e. large/ small/ restraint villages and open countryside)                                       | Number of dwellings permitted within the different areas of the settlement hierarchy  | Direct development to Rushden and the Market Towns<br>Restrict all but small scale or infill development in rural areas, unless promoted through Neighbourhood Plans and/ or rural exceptions housing schemes | Levels of development to accord with the spatial roles set out in table 2 of the Plan<br><br>Levels of residential development to align with table 3 of the Plan |
| EN2  | Provide development principles to guide development in the rural area.  | Location and type of development  | Restrict inappropriate development beyond the main urban/ built up areas  | All proposals to meet the requirements of the policy.  |
| EN3  | Protect the peripheral land of settlements against unsuitable development and provide suitable development management criteria for Rural Exceptions Housing schemes | Development permitted outside of the defined settlement boundaries: number of rural affordable units achieved (Rural Exceptions and open countryside dwellings) | Restrict inappropriate development on the periphery of settlements with a defined boundary, but encourage the provision of affordable housing to meet identified needs in the rural areas                     | No inappropriate development on the periphery of settlements, other than for rural exceptions.   |
| EN4  | Provide clear guidelines for appropriate replacement dwellings in open countryside  | Number of dwellings permitted and/ or built in the open countryside   | Restrict the development of inappropriate new build replacement dwellings in open countryside   | No inappropriate new build replacement dwellings in the open countryside other than those which accord with Policy EN4.  |
| EN5  | Protect and enhance existing and future Green Infrastructure corridors  | Net loss/ gain in GI across the district<br>New open space provided within or connected to the existing GI network<br>Projects to enhance GI in the district    | To increase in connected open space and GI throughout the district  | Overall net gain in GI.  |
| EN6  | Protect and enhance the Greenway and its connections to the wider GI network  | Number and amount of contributions by developers and other funding streams<br>Completion of Greenway projects/ developments                                     | Complete the Greenway within the district   | Increase in the number of GI projects completed.<br><br>Completion of the Greenway and associated projects.  |
| EN7  | Define an enhanced local interpretation of the NPPF criteria for the designation of Local Green Space   | Designation of Local Green Space within Neighbourhood Plans   | To facilitate the protection of Local Green Space   | No loss of Local Green Space.<br><br>Net increase in Local Green Space.  |
| EN8  | Enhance existing open space or provide new open space   | Number of permitted developments of 10 or more dwellings, or 0.3 or more hectares   | To ensure new development makes adequate provision for open space.  | Net increase in open space across the district.<br><br>No net loss of open   |

| <b>Table 27: Performance indicators and targets for monitoring</b> |  |   |  |  |
|--|--|---|--|--|
| <b>Policy</b>  | <b>Objective</b>   | <b>Indicator</b>  | <b>Aims</b>  | <b>Targets</b>   |
|  |  |   |  | space.   |
| E9   | Enhance existing sport and recreation facilities, or provide new sport and recreation facilities   | Amount of new sports and recreation facilities provided/ contributions secured toward facilities.   | To ensure new development makes adequate provision for sports and recreation facilities.   | Net increase in sport and recreation facilities provided/ increase in improvements towards existing facilities.<br><br>No net loss of sport and recreation facilities.   |
| EN10   | Provide additional direction re strengthening the role of health and wellbeing as a critical aspect of place shaping   | Number of permissions and refusals where the policy was used to make the decision   | To enable and promote healthy lifestyles.  | All major applications to be accompanied by a HIA.   |
| EN11   | Provide clear guidance for the design of development with regard to its impact on the surrounding area   | Number of permissions and refusals where the policy was used to make the decision<br><br>No upheld at appeal  | Restrict inappropriate development of new buildings and extensions so that they are in keeping with the surrounding environment                              | 100% of cases refused on design grounds to be upheld at appeal.  |
| EN12   | Sustain and enhance the appearance and setting of designated heritage assets   | Number of permissions and refusals where the policy was used to make the decision<br><br>Maintaining Heritage Assets<br><br>Maintaining non designated Heritage Assets<br><br>Change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub regional or local significance | Restrict inappropriate development which affects a designated heritage asset or its setting  | Maintain existing areas designated Conservation Areas (no net loss);<br><br>Maintain existing number of listed buildings (no loss)<br><br>Maintain the number of Scheduled Monuments;<br><br>Reduce the number of heritage assets at risk (number on Historic England's Heritage at Risk Register) |
| EN13   | Sustain and enhance the appearance and setting of non-designated heritage assets   | Number of permissions and refusals where the policy was used to make the decision   | Restrict inappropriate development which affects a non-designated heritage asset or its setting  | Maintain non-designated heritage assets (no loss).   |
| EN14   | Provide clear direction for tourist and cultural developments in the Nene Valley corridor and Rockingham Forest areas and support the conversion of small-scale redundant or | Number of permitted tourist and cultural development within defined Nene Valley and Rockingham Forest areas<br><br>Number of permitted  | Encourage appropriate development in the Nene Valley corridor and Rockingham Forest areas, including the conversion of redundant small-scale rural buildings | A net increase of tourist/ cultural facilities   |

| <b>Table 27: Performance indicators and targets for monitoring</b> |  |  |   |   |
|--|--|--|---|---|
| <b>Policy</b>  | <b>Objective</b>   | <b>Indicator</b>   | <b>Aims</b>   | <b>Targets</b>  |
|  | disused rural buildings to guest house/ B&B accommodation  | conversions of rural outbuildings to provide overnight accommodation   |   |   |
| EN15   | Set out policy criteria for the future development/ expansion of commercial floorspace (e.g. by way of the development of further enterprise centres or similar) | Number of developments (future sites/ expansion of existing premises) successfully implemented in accordance with Policy EN18  | Encourage established businesses to expand and grow in appropriate locations                  | A net increase in the number of completions for small and medium scale commercial development.  |
| EN   | Ensure that existing employment sites are protected for employment use   | Use status of the sites  | To prevent the loss of employment uses within the Protected Employment Areas                  | No net loss of employment uses within the Protected Employment Areas unless the site is demonstrably no longer suitable for employment  |
| EN17   | Provide clear direction for the relocation and expansion of existing businesses  | Number of permissions and refusals where the policy was used to make the decision  | Encourage established businesses to expand and grow in appropriate locations                  | All expanded/relocated business to be adjacent to built up area.  |
| EN18   | Increase the vitality of the town centres and primary shopping frontages   | Public realm improvements within the town centres and primary shopping frontages<br><br>Percentage of development within defined town centre boundaries<br><br>Change of use of upper floors<br><br>Change of use to residential (non-primary frontage)<br><br>Percentage of non-retail within primary frontages | Encourage appropriate development within the town centres and primary shopping frontages      | Increase the percentage of town centre development within defined boundaries.<br><br>Decrease the number of vacancies at upper floor level.<br><br>Increase the percentage of retail uses within primary frontage/ decrease non-retail uses in frontages. |
| EN19   | Provide floorspace thresholds for impact assessments for retail developments   | Number of permitted retail developments outside the primary shopping areas of the six towns<br><br>Proposals for out / edge-of centre supported by a sequential test and an impact assessment where above the relevant threshold   | Restrict inappropriate retail development outside the primary shopping areas of the six towns | 100% of proposals for out / edge-of centre supported by a sequential test and impact assessment above the relevant threshold  |
| EN20   | Provide clear direction for specified use developments at local  | Number of permitted specified uses adjacent to the local centres   | Encourage specified uses at the local centres that offer day to day local services,           | 100% adjoining/closely related to built up  |

| <b>Table 27: Performance indicators and targets for monitoring</b> |   |   |   |   |
|--|---|---|---|---|
| <b>Policy</b>  | <b>Objective</b>  | <b>Indicator</b>  | <b>Aims</b>   | <b>Targets</b>  |
|  | centres   |   | improved connectivity and do not affect local amenity   | area;<br><br>Amount of new floorspace for each type of use  |
| EN21   | Implementation of Stoke Doyle Road site within the Plan period  | Meeting strategic housing requirements site specific  | To provide site specific housing requirements assisting the strategic shortfall at Oundle   | Delivery of the site by 2031  |
| EN22   | Implementation of Cotterstock Road site within the Plan period  | Meeting strategic housing requirements site specific  | To provide site specific housing requirements assisting the strategic shortfall at Oundle   | Delivery of the site by 2031  |
| EN23   | Implementation of St Christopher's Drive site within the Plan period  | Meeting strategic housing requirements site specific  | To provide site specific housing requirements assisting the strategic shortfall at Oundle   | Delivery of the site by 2031  |
| EN24   | Implementation of Land east of A6 Bypass/ Bedford Road site within the Plan period  | Meeting strategic housing requirements site specific  | To provide site specific housing requirements assisting the strategic shortfalls for Rushden and Irthlingborough                    | Delivery of the site by 2031  |
| EN25   | Delivery of an appropriate quantum of Category 3 (wheelchair accessible_or adaptable) housing to meet local needs   | Number of Category 3 (wheelchair accessible_or adaptable) units delivered   | To increase the delivery of Category 3 housing  | Delivery of 5% of units as Category 3 housing on sites of 20 dwellings or more  |
| EN26   | Delivery of an appropriate mix of housing sizes, types and tenures to meet local need   | Type, mix and range of units achieved<br><br>Proportion of 1, 2, 3, 4, 5+ bed properties.<br><br>Tenure split of properties   | Encourages a range and mix of house types and tenures to meet the needs of the wider community in accordance with the evidence base | 100% in accordance with tenure/ size proportions set out in the evidence base, unless justified by evidence   |
| EN27   | Delivery of specialist housing:<br><ul style="list-style-type: none"> <li>Older persons accommodation to meet local need</li> <li>Extra Care development schemes as part of major strategic sites in accordance with local needs</li> </ul> | Numbers of older persons (and specifically Extra Care) units of accommodation achieved on sites over and above the defined policy thresholds<br><br>Successful delivery of Extra Care housing at named sites in accordance with development masterplans | To increase delivery of specialist housing for older persons.   | Delivery of 10% of units (20% in rural area) as housing for older people, in accordance with defined policy thresholds<br><br>Delivery of Extra Care housing in association with development in accordance with policy criteria at named sites:<br><ul style="list-style-type: none"> <li>Rushden East SUE</li> <li>Irthlingborough West SUE</li> </ul> |

| <b>Table 27: Performance indicators and targets for monitoring</b> |   |  |   |  |
|--|---|--|---|--|
| <b>Policy</b>  | <b>Objective</b>  | <b>Indicator</b>   | <b>Aims</b>   | <b>Targets</b>   |
|  |   |  |   | <ul style="list-style-type: none"> <li>• St Christopher's Drive, Oundle</li> <li>• Hayway, Northamptonton Road, Rushden</li> <li>• East of Ferrers School, Higham Ferrers</li> </ul>   |
| EN28   | Delivery of self and custom build   | Number of self and custom built dwellings achieved on sites of 50 dwellings or more  | To increase delivery of self and custom build housing.  | <p>At least 5% of plots on sites of 50 dwellings or more provided for self or custom built dwellings</p> <p>Meeting demand on self/custom build register</p>   |
| EN29   | Implementation of Rushden East SUE in accordance with the Local Plan policy framework (Joint Core Strategy Policy 33/ new Policy EN29) and the agreed Masterplan Framework Document (MFD) | <p>Meeting strategic housing requirements site specific</p> <p>Phased delivery of SUE in accordance with MFD phasing/ trajectories</p> | To ensure the principles for delivering the SUE are met.  | Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory   |
| EN30   | Delivery of development within the town centres and surrounding urban areas in accordance with the development principles   | <p>Development permitted in accordance with the policy criteria</p> <p>Enhance vitality/viability of town centres</p>                  | No of development proposals approved in accordance with all of the relevant policy criteria   | <p>Increased footfall in town centres</p> <p>Increase in the proportion of retail use in town centres</p> <p>Increase in proportion of town centre uses</p> <p>Increase in the no of active frontages.</p> <p>Reduction in the no of vacancies in town centres</p> |
| EN31   | Redevelopment of the Splash Pool and Wilkinson sites  | Development permitted on the Splash Pool and Wilkinson sites   | Redevelopment of the sites to include pedestrian links, a new public square, public realm improvements, and provision of public car parking | By 2031, redevelopment of the site as set out in Policy EN31.  |
| EN32   | Redevelopment of the former factory site between  | Development permitted on the former factory site   | Redevelopment of the site to include approximately 10   | By 2031, redevelopment of the  |

| <b>Table 27: Performance indicators and targets for monitoring</b> |  |  |   |   |
|--|--|--|---|---|
| <b>Policy</b>  | <b>Objective</b>   | <b>Indicator</b>   | <b>Aims</b>   | <b>Targets</b>  |
|  | 71 Oakley Road and 37-51 Washbrook Road                                    |  | dwelling with a mix of housing types to meet local needs, developer contributions, vehicular access, and pedestrian/ cycle connections  | site as set out in Policy EN32.                               |
| EN33   | Redevelopment of the Federal Estates site                                  | Development permitted for housing on the Federal Estates site                      | Redevelopment of the site to include at least 120 dwellings with a mix of housing types to meet local need, developer contributions, improved connections and link roads, and appropriate mitigation measures   | By 2031, redevelopment of the site as set out in Policy EN33. |
| EN34   | Release and redevelopment of the Rectory Business Centre site for housing  | Development permitted for housing on the Rectory Business Centre site              | Redevelopment of the site to include at least 35 dwellings with a mix of housing types to meet local need, developer contributions, improved connections and appropriate mitigation measures  | By 2031, redevelopment of the site as set out in Policy EN34. |
| EN35   | Redevelopment of the former Select & Save and St Peter's Way Car Park site | Development permitted on the former Select & Save and St Peter's Way Car Park site | Redevelopment of the site to include a mix of main town centre uses, enhancement of the primary shopping frontage, pedestrian connections, suitable service arrangements, public car parking, live-work units at first floor or above, and enhancement to the settings of heritage assets     | By 2031, redevelopment of the site as set out in Policy EN35. |
| EN36   | Redevelopment of the former Rushden and Diamonds FC Stadium site           | Development permitted on the former Rushden and Diamonds FC Stadium site           | Redevelopment of the site to include flood compatible employment uses, appropriate flood mitigation measures, enhancements to biodiversity, improved pedestrian and cycle connections, high quality landscaping, and new moorings   | By 2031, redevelopment of the site as set out in Policy EN36. |
| EN37   | Redevelopment of the Riverside Hotel site                                  | Development permitted on the Riverside Hotel site                                  | Redevelopment of the site for restaurant, public house, hotel, tourist, training facility/ resource centre, or small business/ employment use, to include retention and enhancement of the heritage asset, appropriate flood mitigation measures, new moorings, and improved arrangements for | By 2031, redevelopment of the site as set out in Policy EN37. |

| <b>Table 27: Performance indicators and targets for monitoring</b> |   |   |   |   |
|--|---|---|---|---|
| <b>Policy</b>  | <b>Objective</b>                        | <b>Indicator</b>                                | <b>Aims</b>   | <b>Targets</b>  |
|  |   |   | pedestrians/ cyclists   |   |
| EN38   | Redevelopment of the Cattle Market site | Development permitted on the Cattle Market site | Redevelopment to include a mix of main town centre uses, opening up of a new active frontage, pedestrian connectivity, vehicular access, appropriate residential uses at first floor level or above, enhancements to the setting of heritage assets, and public car parking | By 2031, redevelopment of the site as set out in Policy EN38. |



## Glossary

**Affordable Housing** – social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.

**Authorities' Monitoring Report (AMR)** – a report that reviews the performance of the Council's planning policies.

**Biodiversity** – the variety of life in all forms.

**Brownfield Land** – land which has previously been developed or built upon.

**Committed development** – Sites already proposed for development, by way of an extant planning permission, resolution to grant planning permission or an adopted development plan (Local Plan/ Neighbourhood Plan) allocation.

**Comparison Retailing** – the provision of items not obtained on a frequent basis, including clothing, footwear and household goods.

**Convenience Retailing** – the provision of everyday essential items, including food, drink and newspapers/ magazines.

**Core Spatial Strategy (CSS)** – the North Northamptonshire Core Spatial Strategy, adopted in June 2008 and covered the period of 2001-2021.

**Curtilage** – Legal definition for the extent of a single planning "unit". Normally this relates to a domestic garden (in the case of a residential property) or servicing/ car parking for a commercial unit, which are incidental to the operation or functional enjoyment of the planning "unit".

**Development Brief** – a document that set out detailed development principles for a development site.

**Development Plan** – includes adopted Local Plans and Neighbourhood Plans.

**Geodiversity** – the range of rocks, minerals, fossils, soils and landforms.

**Green Infrastructure (GI)** – a network of multi-functional green space which is capable of delivering a range of environmental and quality of life benefits for local communities. GI consists of both statutory (SPA/ Ramsar site, SSSIs or LNRs) and/ or non-statutory (Local Wildlife Sites, Local Geological Sites, Protected Wildflower Verges or Pocket Parks). Individually and collectively these form the Council's ecological resources, providing ecosystem services for the district.

**Habitat Regulations Assessment** – required under the European Directive 92/43/EEC to assess the impacts of implementing a policy on European (Natura 2000) Sites, to determine whether it would have an adverse effect on the integrity of the site.

**Heritage Asset** – a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.

**Housing Land Supply** – paragraph 73 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement, including a buffer.

**Infill or windfall development** – Smaller scale, minor development proposals, typically up to 5 dwellings for rural or 10 dwellings for urban areas, which take place within the existing built up area, as defined by Policies EN1-EN2 and the supporting text. and/ or a defined settlement boundary in a Neighbourhood Plan.

**Joint Core Strategy (JCS)** – the North Northamptonshire Joint Core Strategy, adopted in July 2016 and covering the period of 2011-2031.

**Local Centre** – a centre that includes a range of small shops and services of a local convenience nature, serving a small catchment.

**Local Enterprise Partnership (LEP)** – a voluntary partnership between local authorities and businesses to create/ improve conditions for economic growth.

**Local Plan** – the plan for future development of the local area, drawn up by the local planning authority in consultation with the community.

**Local Planning Authority (LPA)** – East Northamptonshire Council is the former local planning authority for the district, North Northamptonshire became the Unitary Council on 1 April 2021.

**Main Town Centre Uses** – retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**National Planning Policy Framework (NPPF)** – sets out the Government's planning policies for England and how these are expected to be applied.

**Neighbourhood Plan** – a plan prepared by a town/ parish council or neighbourhood forum for a particular neighbourhood area.

**North Northamptonshire Joint Planning Unit (NNJPU)** – the former local partnership between Corby, Kettering, Wellingborough and East Northamptonshire councils, together with Northamptonshire County Council.

**Planning Practice Guidance (PPG)** – a web-based resource which sets out national planning guidance on various topics.

**Policies Map** – shows the policies of the development plan.

**Previously Developed Land** – land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.

**Primary Shopping Area**– defined area where retail development is concentrated

**Primary Shopping Frontage** – Shopping frontage which contains a high proportion of retail uses.

**Section 106 Agreement (S106)** – a legally binding agreement or planning obligation between the local planning authority and named parties in relation to a planning application, often referred to as developer contributions.

**Self and Custom Build Housing** – housing built by an individual, a group of individuals, or persons working with or for them, to be occupied as homes by those individuals.

**Sequential and Exception Tests (flood risk management)** – two key tests to be applied where development is proposed within the designated Environment Agency Flood Zones 2 and 3.

**Sequential and Impact Tests (Main Town Centre Uses)** – two key tests to be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan

**Settlement boundary criteria** – Policy EN2, and its supporting text, specifies criteria by which built-up areas of settlements should be defined. -These boundaries are solely for development management (decision making) and have no other function.

**Settlement typologies** – Four distinctive rural settlement typologies are noted in the Plan. Two of these typologies are freestanding villages, with a sub-division between large and small villages. Urban outliers are situated at the rural hinterlands/ fringes of main urban areas, while some parishes host rural outliers, beyond the main built up areas.

**Site of Special Scientific Interest (SSSI)** – a site or area identified and designated by Natural England as being important due to its wildlife, geology or landform.

**Special Protection Area (SPA)** – an area designated under the European Union Directive on the Conservation of Wild Birds as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries

**Strategic Environmental Assessment (SEA)** – required by European Directive 2001/42/EC and carried out as part of the wider Sustainability Appraisal to assess the effects of certain plans and programmes on the environment.

**Strategic Housing Market Assessment (SHMA)** – a technical study which assesses housing need and demand across a defined market area.

**Sustainability Appraisal (SA)** – Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a Sustainability Appraisal of each of the proposals in a Local Plan during its preparation, to promote sustainable development and ensure the Plan contributes to environmental, economic and social objectives.

**Sustainable Urban Extension (SUE)** – a substantial mixed use development including employment, local facilities and at least 500 new homes, which provide well planned and managed new neighbourhoods.

**Supplementary Planning Document (SPD)** – a document that adds further detail to policies in the Local Plan with regard to specific sites or particular issues.

**Town Centre** – a defined area which includes the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

**Urban re-imagination** – Also known as “urban re-branding”, this concept involves the application of a range of initiatives to highlight the positive virtues and characteristics of a town, in turn creating local pride and with this the attraction of new investment. The best known example of this concept is Barcelona, and the legacy of the 1992 Olympic Games.

## **DRAFT ADOPTION STATEMENT – EAST NORTHAMPTONSHIRE LOCAL PLAN PART 2**

In accordance with Regulation 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 notice is hereby given that North Northamptonshire Council adopted the East Northamptonshire Local Plan Part 2 on *(date to be confirmed, anticipated as 7 December 2023)*.

The East Northamptonshire Local Plan Part 2 was the subject of an independent examination conducted by Inspector Caroline Mulloy BSc (Hons) Dip TP, MRTPI appointed by the Secretary of State. In the report published on 31 July 2023, the Inspector confirmed that the Plan was sound, subject to a series of main modifications. The main modifications recommended by the Inspector, together with additional minor modifications (which do not change the meaning of the policies) are included in the adopted East Northamptonshire Local Plan Part 2. These can be viewed on the Council's examination webpages at:

*Weblink to be provided following adoption.*

Any person aggrieved by the East Northamptonshire Local Plan Part 2 may, with the leave of the High Court, make an application under Section 113(3) of the Planning and Compulsory Purchase Act 2004 to quash the Plan on the grounds that:

- The East Northamptonshire Local Plan Part 2 is not within the powers conferred by Part 2 of the Planning and Compulsory Purchase Act 2004; or
- a procedural requirement of the Act or its associated Regulations has not been complied with.

Any such application for leave must be made to the Court under Section 113 of the Planning and Compulsory Purchase Act 2004 no later than the end of the period of six weeks beginning with the day after the date on which the East Northamptonshire Local Plan Part 2 Local Plan was adopted. *(date to be confirmed, anticipated as 7 December 2023)*.

In accordance with Regulations 26 and 35 of the 2012 Regulations, the following documents have been made available:

- I. East Northamptonshire Local Plan Part 2 and Policies Map;
- II. This Adoption Statement; and
- III. Sustainability Appraisal Report.

A copy of the documents listed can be viewed on the Council's website as indicated above. Alternatively, hard copies are available for inspection at the Council Offices, East Northamptonshire House, Cedar Drive, Thrapston, Northamptonshire NN14 4LZ and at the following libraries: Irthlingborough, Oundle, Raunds, Rushden and Thrapston, during normal opening hours.

If you require further information, please email:  
[planningpolicy.ENC@northnorthants.gov.uk](mailto:planningpolicy.ENC@northnorthants.gov.uk)

A copy of this Adoption Statement will be sent to the Secretary of State for Housing, Communities and Local Government.

# Sustainability Appraisal for the East Northamptonshire Part 2 Local Plan

Adoption Statement

North Northamptonshire Council

September 2023

## Quality information

| Prepared by                           | Checked by                                 | Verified by                           | Approved by                                |
|---------------------------------------|--|---------------------------------------|--|
| Ian McCluskey<br>Associate Consultant | Nick Chisholm Batten<br>Technical Director | Ian McCluskey<br>Associate Consultant | Nick Chisholm Batten<br>Technical Director |

## Revision History

| Revision | Revision date  | Details                   | Name          | Position             |
|----------|----------------|---------------------------|---------------|----------------------|
| V1       | September 2023 | Draft for internal review | Ian McCluskey | Associate Consultant |
| V2       | October 2023   | Final Draft               | Ian McCluskey | Associate Consultant |

### Prepared for:

North Northamptonshire Council

### Prepared by:

AECOM Limited  
100 Embankment,  
Cathedral Approach,  
Salford  
M3 7FB

aecom.com

© 2023 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for sole use of our client (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.



**THIS PAGE IS INTENTIONALLY LEFT BLANK**

## Table of Contents

|    |   |    |
|----|---|----|
| 1. | Introduction.....   | 1  |
| 2. | The ‘story’ of plan-making and SA up to the point of adoption ..... | 3  |
| 3. | How has the SA influenced decision making? .....                    | 6  |
| 4. | Monitoring.....   | 8  |
| 5. | Conclusions.....  | 14 |

# 1. Introduction

## Background

- 1.1 North Northamptonshire Council (which, subsequent to local government reorganisation, now has responsibility for the area previously administered by East Northamptonshire District Council) has prepared a new Part 2 Local Plan for the East Northamptonshire area. This has been developed in the context of the adopted North Northamptonshire Joint Core Strategy (2016), which forms Part 1 of the Local Plan, as well as the plans and programmes of the surrounding local authorities in accordance with the statutory Duty to Cooperate.
- 1.2 The Part 2 Local Plan was submitted to Government, for Examination by an appointed Planning Inspector, on the 29<sup>th</sup> March 2021. Following an extensive Examination process, the Inspector published a report into the Plan's legal compliance and soundness in July 2023. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Part 2 Local Plan, incorporating modifications, is being put forward for adoption at a Full Council meeting.
- 1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM.

## SA explained

- 1.4 SA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the Part 2 Local Plan's contribution to sustainable development.
- 1.5 A SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations). SA incorporates the requirement for SEA and widens the scope of the assessment to also include social and economic issues.

## This SA Adoption Statement

- 1.6 Regulation 16 of the SEA Regulations sets out the post-adoption procedures with respect to SEA. It requires that, as soon as reasonably practicable after the adoption of a plan for which an SA / SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA Adoption Statement', and inform the public and consultation bodies of the availability of these documents. The consultation bodies are the Environment Agency, Historic England and Natural England.
- 1.7 This document is the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) Adoption Statement to accompany the adoption of the Part 2 Local Plan.

- 1.8 The Sustainability Appraisal (SA) Adoption Statement describes the process, how the findings of the SA were taken into account and informed the development of the Local Plan, and the monitoring indicators that will be applied to check the accuracy of predicted effects and to monitor progress against sustainability objectives.

## 2. The ‘story’ of plan-making and SA up to the point of adoption

### Introduction

- 2.1 This section gives consideration to each of the main plan-making and SA steps in turn. It is common for the plan-making and SA process to involve numerous iterations of the draft Plan, and this was also the case with the East Northamptonshire 2 Local Plan.

### Key plan making milestones

- 2.2 This section outlines the key milestones throughout the plan-making process and the key elements of the Plan that were developed during each stage.

#### Reg 18 consultation document (January - April 2017)

- 2.3 The initial stages of the plan-making process involved scoping out the key issues and early engagement with stakeholders. A ‘Regulation 18’ consultation was undertaken for six weeks, which consisted of several elements.
- A document explaining the plan-making process and asking a series of high-level questions to stakeholders
  - A call for sites
  - SA and HRA scoping

#### Stakeholder Workshops (May 2017 – April 2018)

- 2.4 The first Regulation 18 consultation was followed by a series of workshops, for Members and representatives of Town and Parish Councils. Summary feedback from these workshops (key issues and themes) was reported to the respective Planning Policy Committee meetings. This, together with the Regulation 18 feedback, informed the development of policies and proposals for the draft Plan

#### Draft Local Plan Part 2 Consultation (November 2018 – February 2019)

- 2.5 A full draft of the Local Plan Part 2 was published for consultation, giving stakeholders the opportunity to comment on the draft policies and text. The draft Plan contained a range of policies under following chapters; ‘spatial strategy’, ‘natural capital’, ‘social capital’, ‘economic prosperity’, ‘housing delivery’, ‘town strategies’, and ‘monitoring and implementation’.
- 2.6 Representations received during the draft Local Plan Part 2 consultation were reported to the Planning Policy Committee. The Council’s responses to representations were approved in stages; at various meetings of the Planning Policy Committee held between March 2019 and January 2020:

#### Additional sites consultation (February – March 2020)

#### Alternative sites (Rushden) consultation (October – November 2020)

- 2.7 The Council undertook a focused consultation on proposals for additional development sites in Rushden.

### **Pre submission Draft Local Plan Part 2 consultation (5<sup>th</sup> Feb – 19<sup>th</sup> March 2021)**

- 2.8 The Council (Planning Policy Committee, 27th January 2021) approved the Pre-Submission Draft Local Plan Part 2 for submission to the Secretary of State for Housing, Communities and Local Government, under the Town and Country Planning (Local Plans) (England) Regulations 2012, as amended.
- 2.9 The Regulation 19 consultation took place from Friday 5th February until Friday 19th March 2021, inclusive.

### **Modifications**

- 2.10 Following the Examination hearings, the Council published Proposed Main Modifications to the Plan for public consultation in March -April 2023 . Following this consultation, the Planning Inspector's final report on the Part 2 Local Plan, concluded that with the Inspector's recommended Main Modifications (dated July 2023) the Plan is considered 'sound'.

### **SA Preparation alongside the Local Plan**

- 2.11 This section outlines the key stages and outputs from the SA process and how they related to the preparation of the East Northamptonshire Part 2 Local Plan.

### **North Northamptonshire Joint Core Strategy (2016)**

- 2.12 The Joint Core Strategy sets out the spatial strategy for North Northamptonshire including the East Northamptonshire area, which is important from an SA perspective, as it narrows the scope of the Plan. In particular, the need to consider reasonable alternatives for growth is reduced given the framework set by the Joint Core Strategy.
- 2.13 The Joint Core Strategy was subjected to a legally compliant SA process, which tested different spatial options for housing and employment growth. This influenced the spatial strategy for the East Northamptonshire area (and the rest of North Northamptonshire), and it was not necessary to reconsider such issues.

### **Scoping**

- 2.14 The start of the SA process was to prepare and consult on a SA Scoping Report. A number of consultation bodies (notably the Statutory Bodies: Historic England, the Environment Agency, and Natural England) and other stakeholder bodies were consulted on the Scoping Report alongside first Regulation 18 consultation stage between January – April 2017.
- 2.15 The scope was revisited and updated throughout the plan-making process. However, the underlying key issues remained fundamentally the same as those agreed during the initial scoping consultation. Therefore, the SA Framework remained appropriate.

### **Interim SA work (2017-2020)**

- 2.16 SA was undertaken alongside key stages of plan making, with the preparation of interim SA Reports helping to inform decision making. The following key tasks were undertaken as the Plan progressed.

- Consideration and appraisal of spatial strategy options including housing growth and distribution;
- Appraisal of housing options for Oundle (Interim Report, December 2018)
- Appraisal of site options.
- Appraisal of draft policies.

### **Sustainability Appraisal (SA) of the Publication Plan (January 2021)**

2.17 The SA Report accompanied the Publication version of the Local Plan that was subsequently submitted to government for independent examination following consultation. The SA Report presented an updated appraisal of the Plan 'as a whole', focusing on policies, site allocations and the overall strategy.

### **SA Report Addendum: Appraisal of Modifications (November 2022)**

2.18 Following the Local Plan examination hearings, an update to the sustainability appraisal was undertaken to take account of the proposed Main Modifications.

2.19 This involved screening the Main Modifications to identify those that could potentially lead to substantial changes to the SA findings / give rise to significant effects. The Main Modifications that were 'screened in', were then considered in further detail to identify if there were any reasonable alternatives, and to establish the implications of the changes to the plan in sustainability terms.

2.20 The appraisal identified that the main modifications would lead to no significant effects, and limited changes to the sustainability appraisal findings when considering the overall effects of the Plan 'as a whole' (compared to the Submission version of the Plan).

## 3. How has the SA influenced decision making?

### Introduction

- 3.1 Essentially, SA must feed-into and inform plan-making in two ways:
1. Appraisal of alternatives and draft policies should inform preparation of the draft Plan.
  2. The SA Report, and consultation responses received during the Draft Plan / SA Report consultation, should inform plan finalisation.
- 3.2 This section briefly discusses the key elements of the SA process, and how the findings were fed-into the Plan making process. There is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal, site assessments, policy appraisal, and consultation on Plan / SA documents.

### Influencing the spatial strategy

- 3.3 When considering alternatives to the policies and approaches within the Part 2 Local Plan, it was important to acknowledge the role of the Joint Core Strategy. The Joint Core Strategy already sets the spatial strategy for the East Northamptonshire area, and so no further reasonable alternatives were identified in this respect.
- 3.4 There was, however, scope for the Part 2 Local Plan to explore the potential to plan for further housing growth to support 'local needs'. The Council explored options for different settlements, with each discussed in turn below.

### Oundle

- 3.5 Two strategic options were identified and appraised for Oundle. The first saw three strategic sites being proposed as part of the Draft Plan (informed by site assessments and other evidence). The second option involved a different package of sites, informed by the emerging Oundle Neighbourhood Plan. The options performed very similarly overall across the full range of SA topics.

### Rushden and Irthlingborough

- 3.6 Five strategic locations at Irthlingborough and Rushden (lying within the East Northamptonshire area) were identified as reasonable alternatives and subsequently assessed as potential site options for growth.
- 3.7 The SA broadly supported the decision to allocate a site in Rushden. However, concerns arose about the specific site identified, so additional SA (and HRA) work was undertaken to understand potential impacts and influence the decision making process.



## Unreasonable alternatives

3.8 The SA process was utilised to establish that the following alternatives were unreasonable:

- Increased amount of housing overall to provide further flexibility,
- Increased housing growth in rural areas,
- Propose additional employment land allocations,
- Increased growth in Higham Ferrers, Raunds and Thrapston.

## Influencing policy content

3.9 Once draft policies had been written, these were appraised against the SA framework to identify potential positive and negative effects. At this stage, the SA also identified a series of mitigation and enhancement measures, which were then considered by the Council when finalising the policies.

3.10 Site appraisals were also undertaken to identify constraints and opportunities for different site options. As part of this process, measures were identified to aid in mitigation at specific sites. For example, this included measures such as; the need to consider the setting of heritage assets, the need to compensate for the loss of community facilities, and the need to promote enhanced walking and cycling measures.

## Influencing the Main Modifications

3.11 Further sustainability appraisal was undertaken at this stage to understand the implications of the proposed Main Modifications. A report was published in November 2022 setting out the findings.

3.12 Eight Modifications (including 3 modifications involving similar changes related to the HRA) were identified for further exploration. This involved a consideration of potential alternatives, though none were found to be reasonable. The Main Modifications were also subjected to appraisal both individually, and also considered 'as a whole'.

3.13 The Modifications were identified as having positive and negative implications, but none of these were found to be significant or to lead to notable changes to the SA Report findings. No mitigation or enhancement measures were identified throughout the appraisal process at this stage.

## 4. Monitoring

- 4.1 The SEA Regulations require that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”*.
- 4.2 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements identified in the SA Report. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA are based on data that is already being routinely collected at a local level by North Northamptonshire Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Part 2 Local Plan.
- 4.3 Table 4.1 outlines a monitoring framework for measuring effects of the East Northamptonshire Part 2 Local Plan against each of the SA themes presented in the SA Report. This will ensure that any significant effects continue to be monitored over the plan period.
- 4.4 Monitoring measures in purple text are those that are **already part of the monitoring framework for the Joint Core Strategy**.
- 4.5 Monitoring measures in blue text are those that are **proposed for monitoring the Part 2 Local Plan itself**. There is some overlap between these indicators and those that are being used for the Joint Core Strategy.
- 4.6 All other indicators are those being suggested through the SA process as additional measures, to monitor specific effects identified in the SA that are not covered by the existing and proposed Local Plan monitoring frameworks.

**Table 4.1 SA Monitoring Framework for the East Northamptonshire Part 2 Local Plan**

| Summary of effects   | Potential monitoring measures   |
|--|---|
| <p><b>Accessibility</b></p> <p><b>Significant positive effects</b> are predicted due to a focus on accessible locations and support for green infrastructure enhancement.</p>  | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• <b>Accessibility to services and facilities from new residential developments.</b></li> <li>• <b>Completion of Greenway projects/ developments</b></li> </ul>            |
| <p><b>Housing</b></p> <p><b>Significant positive effects</b> due to support for additional housing across the HMA.</p>   | <ul style="list-style-type: none"> <li>• <b>Net additional dwellings</b></li> <li>• <b>Number of dwellings permitted/constructed within the different category areas of the settlement hierarchy</b></li> <li>• <b>Affordable housing provision</b></li> </ul>  |
| <p><b>Health and Liveability</b></p> <p><b>Significant positive effects</b> due to a combination of housing delivery, regeneration, creation and enhancement of open space, green infrastructure and the promotion of active travel.</p> | <ul style="list-style-type: none"> <li>• <b>Provision of accessible greenspaces</b></li> <li>• <b>Net loss/ gain in GI across the district</b></li> <li>• <b>Completion of Greenway projects/ developments</b></li> <li>• <b>Amount of new sports and recreation facilities provided/ contributions secured toward facilities.</b></li> </ul> |

|  |   |
|--|---|
| <p><b>Crime</b></p> <p>The regeneration of key town centre sites may contribute to improved community safety and reduce the perception of crime in the district. Overall, a <b>minor positive effect</b> is predicted.</p>                                 | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Improvement of deprivation</li> <li>• Improvement of crime rates</li> </ul>  |
| <p><b>Community</b></p> <p><b>Minor positive effects</b> are predicted with regards to community cohesion.</p>   | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>•</li> </ul>   |
| <p><b>Biodiversity</b></p> <p>The additional protections and enhancement measures are considered likely to lead to <b>minor positive effects</b>. This relates to the potential to strengthen ecological networks from a locally specific perspective.</p> | <ul style="list-style-type: none"> <li>• % of nationally important wildlife sites that are in favourable condition.</li> <li>• Woodland access</li> <li>• Net loss / gain in Green Infrastructure across the borough.</li> <li>• Change in areas of biodiversity importance.</li> <li>• Net loss/ gain in GI across the district</li> </ul> |
| <p><b>Landscape</b></p> <p>Though additional site allocations could lead to some <b>minor negative effects</b>, the broader policies in the Plan are protective and where regeneration is involved could lead to <b>minor positive effects</b>.</p>        | <p>Whilst no significant effects have been identified, the following indicators could be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Number of permissions and refusals when policies relating to design / landscape were used to make the decision.</li> </ul>  |

## Cultural Heritage

Though some development locations are close to or contain heritage assets, there are policy mitigation and enhancement measures in place. Several plan policies should also have indirect positive effects on heritage through improvements to the public realm. Overall **minor positive effects** are predicted in the long term.

Whilst no significant effects have been identified, the following indicators could be used to monitor general trends:

- Number of listed Buildings on the At-Risk Register.
- Maintaining non designated Heritage Assets
- Change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub regional or local significance
- Permissions and refusals where heritage and design policies were used to make the decision.

## Air

The Plan supports growth in accessible locations and encourages an increase in sustainable modes of travel and green infrastructure. Overall, the effects in terms of air quality are predicted to be **minor positive** in the long term.

Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:

- Locations close to or exceeding levels of poor air quality sufficient to warrant designation of an air quality management area.

## Water

The Plan is likely to have some indirect **minor positive effects** through the introduction of green infrastructure and sustainable drainage.

Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:

- % of river lengths assessed as having 'good' biological/ chemical quality as defined by the Water Framework Directive.

|   |   |
|---|---|
| <p><b>Natural Hazard</b></p> <p>The additional provisions of the Local Plan do not undermine the strategic directions or add any significant enhancements in respect of flooding. On balance, <b>neutral effects</b> are predicted.</p>                     | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Residential development permitted in Flood Zones 2 and 3.</li> </ul>   |
| <p><b>Soil and Land</b></p> <p>On balance, <b>neutral effects</b> are predicted overall, with some gains and some losses in relation to soil and land in different parts of the district.</p>   | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Number and % of new development on previously developed land.</li> <li>• Loss of best and most agricultural land by classification (Ha)</li> </ul>                                 |
| <p><b>Minerals</b></p> <p>The Plan has limited policy influence on minerals planning. The small scale of growth also means that any overlap with mineral safeguarding areas is insignificant. Overall, <b>neutral effects</b> are predicted.</p>            | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Hectares of development land located within mineral safeguarding areas.</li> </ul>   |
| <p><b>Energy Use and Climate Change</b></p> <p>The continued support provided at the local level (to climate change efforts) is likely to support wider actions to move to carbon neutrality and deliver <b>minor positive effects</b> in this respect.</p> | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p> <ul style="list-style-type: none"> <li>• Number and proportion of appropriate developments implementing SUDs and green roofs.</li> <li>• Permitted and Completed Renewable Energy Installations by type and area</li> </ul> |

|   |  |
|---|--|
| <p><b>Waste</b></p> <p>The Plan does not propose any measures which are likely to undermine existing waste planning or provide any significant opportunities for enhancement. Therefore, <b>neutral effects</b> are predicted.</p>  | <p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p>  |
| <p><b>Employment, wealth creation and skills</b></p> <p>The plan sets out a strategy to deliver economic development throughout the district with a focus on protecting and enhancing town centres and existing employment areas. Whilst there is some loss of employment land likely to occur, this is outweighed by the benefits of regeneration opportunities. The provision of new education facilities in identified locations is predicted to have <b>significant positive effects</b> in terms of education.</p> | <ul style="list-style-type: none"> <li>• Total amount of new employment floorspace.</li> <li>• No. of net additional jobs provided by LPA on an annualised basis.</li> <li>• Use status/retention of existing employment sites</li> <li>• Completion / progress of new education facilities</li> </ul>   |
| <p><b>Town Centres</b></p> <p>The Plan seeks to both enhance and protect the vitality and viability of town centres, including through new uses, regeneration and an element of housing provision (delivered through the Local Plan). As a result, <b>significant positive effects</b> are predicted</p>  | <ul style="list-style-type: none"> <li>• Report on the quantum and scale of retail developments (m<sup>2</sup> net) approved outside of the defined town centre areas.</li> <li>• Change of use of upper floors</li> <li>• Change of use to residential (non-primary frontage)</li> <li>• Percentage of non-retail within primary frontages</li> </ul> |

## 5. Conclusions

- 5.1 This SA Adoption Statement demonstrates that a robust and iterative SA process has been progressed alongside plan-making, with appraisal findings feeding-in to decision-making at each stage. Any representations received were taken into account and informed subsequent stages of the SA process. The SA Report demonstrably complies with the SEA Regulations and is found to be adequate by the Inspector.
- 5.2 In summary, the following reports were published as part of the SA process:
- SA Scoping Report (2017);
  - Interim SA Report (Oundle Spatial Options, 2018)
  - Interim SA Report (Draft Local Plan, 2019)
  - Regulation 19 SA Report (January, 2021); and
  - SA Report Addendum (November 2022).
- 5.3 Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the Part 2 Publication Plan (Regulation 19 version) in December 2019, presenting the required information. The report served to inform representations on the Plan, and then served to inform plan finalisation. The Inspectors Final Report (July 2023) also states that in terms of legal compliant the SA carried out is 'adequate'.
- 5.4 This SA Adoption Statement is the final step in the SA process.







## **Report to North Northamptonshire Council**

**by Caroline Mulloy BSc (Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State

Date: 31 July 2023

---

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

## **Report on the Examination of the East Northamptonshire Local Plan Part 2, 2011-2031**

The Plan was submitted for examination on 29 March 2021

The examination hearing was held between 6 April 2022 and 5 May 2022

File Ref: PINS/G2815/429/5

## Contents

|   |          |
|---|----------|
| Abbreviations used in this report .....               | 3        |
| Non-Technical Summary .....                           | 4        |
| Introduction.....                                     | 5        |
| Context of the Plan .....                             | 6        |
| Public Sector Equality Duty .....                     | 7        |
| Assessment of Duty to Co-operate .....                | 7        |
| Assessment of Other Aspects of Legal Compliance ..... | 7        |
| Assessment of Soundness .....                         | 9        |
| Issue 1 – Spatial Strategy.....                       | 9        |
| Issue 2 – Housing requirement and provision.....      | 13       |
| Issue 3 – Meeting Other Housing Need.....             | 21       |
| Issue 4 – Housing Allocations.....                    | 28       |
| Issue 5 – Employment .....                            | 36       |
| Issue 6 – Town Centres.....                           | 38       |
| Issue 7 – Social Capital .....                        | 43       |
| Issue 8 – Natural Capital .....                       | 45       |
| Issue 9 – Viability.....                              | 47       |
| Issue 10 - Monitoring .....                           | 48       |
| Overall Conclusion and Recommendation.....            | 49       |
| Schedule of Main Modifications .....                  | Appendix |

## Abbreviations used in this report

|               |   |
|---------------|---|
| Dpa           | Dwellings per annum                                       |
| DPD           | Development Plan Document                                 |
| The Framework | National Planning Policy Framework (2021)                 |
| GI            | Green Infrastructure                                      |
| The Guidance  | National Planning Practice Guidance                       |
| GTAA          | Gypsy and Traveller Accommodation Assessment              |
| HRA           | Habitats Regulation Assessment                            |
| JCS           | North Northamptonshire Joint Core Strategy                |
| VA            | Local Plan Viability Assessment                           |
| LDS           | Local Development Scheme                                  |
| MFD           | Masterplan Framework Document                             |
| MM            | Main Modification   |
| NP            | Neighbourhood Plan  |
| ORS           | Opinion Research Services                                 |
| The Plan      | East Northamptonshire Local Plan Part 2                   |
| PPTS          | National Planning Policy for Traveller Sites (March 2012) |
| RNOTP         | Rural North, Oundle and Thrapston Plan (2011)             |
| SA            | Sustainability Appraisal                                  |
| SANG          | Strategic Accessible Natural Greenspace                   |
| SCBH          | Self and Custom Build Housing                             |
| SCI           | Statement of Community Involvement                        |
| SHLAA         | Strategic Housing Land Availability Assessment            |
| SPD           | Supplementary Planning Document                           |
| SFRA          | Strategic Flood Risk Assessment                           |
| SPA           | Special Protection Area                                   |
| SUE           | Sustainable Urban Extension                               |
| The Council   | North Northamptonshire Council                            |

## Non-Technical Summary

This report concludes that the Plan provides an appropriate basis for the planning of the East Northamptonshire area of North Northamptonshire Council (the Council), provided that a number of main modifications [MMs] are made to it. The Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the MMs and, where necessary, carried out sustainability appraisal (SA) and habitats regulations assessment (HRA) of them. The MMs were subject to public consultation over a 6-week period. In some cases, I have amended their detailed wording and/or added consequential post consultation modifications where necessary. I have recommended their inclusion in the Plan after considering the SA/HRA and all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- Deletions and amendments to ensure that only policies that provide a clear indication of how a decision maker should react to a development proposal are included in the Plan, including significant revisions to the Spatial Development Strategy policies;
- Rewording policies to ensure they are positively prepared, effective and consistent with the North Northamptonshire Joint Core Strategy (JCS) and national policy.
- Deletion of Appendix 6 – The Rushden East Masterplan Framework Document (MFD) and the incorporation of the key planning principles into Policy EN33.
- Deletion of a school site allocation (Policy EN17) to reflect that the school has been constructed.
- A number of other MMs to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the East Northamptonshire Local Plan Part 2 2011-2031 in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The Framework (paragraph 35) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a legally compliant and sound Plan. The Plan submitted in March 2021 is the basis for my examination. It is the same document as was published for consultation in February 2021.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any MMs necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearing, the Council prepared a schedule of proposed MMs and, where necessary, carried out SA and HRA of them. The MMs schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light, I have made some amendments to the detailed wording of the main modifications and added consequential modifications post-consultation where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the MMs as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken. Where necessary I have highlighted these amendments in the report.

## Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Policies Map and Insets.
6. The policies map is not defined in statute as a development plan document (DPD) and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be

made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.

7. The 'Schedule of Proposed Policies Map Modifications to the Submission Local Plan March 2023', published alongside the MMs addresses the above changes and where the changes relate to a MM this is specified in the schedule. A number of changes are also made to the policies map by the Council which are unrelated to the MMs as follows: to correct drafting errors; to clarify on the Policies Map legend that Policy EN8 relates to The Greenway; and that Policy EN7 relates to GI Corridors.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in Schedule of Proposed Policies Map Modifications to the Submission Local Plan March 2023'.

## Context of the Plan

9. The Plan is a Part 2 Plan which has been produced to enable the effective delivery of the Part 1 Plan, the North Northamptonshire Joint Core Strategy (JCS) (ED B-01). This was prepared jointly by the district and borough Councils of Corby, East Northamptonshire, Kettering and Wellingborough and was adopted in July 2016. The JCS provides the strategic planning background to the matters contained in the Plan. It sets out the spatial strategy and the level of growth required along with its broad distribution. It also allocates strategic housing and employment sites and sets out strategic policies, place shaping requirements and development management policies.
10. As this is a subsidiary plan, there is no requirement for me to re-examine the strategic issues which were covered in the JCS and found to be sound. In particular, the Framework does not require the Plan to address the question of whether further housing provision will need to be made. This is a matter for any future review of the JCS.
11. The Plan will sit alongside the JCS, the Brigstock Neighbourhood Development Plan (NP) (2019), the Barrowden and Wakerley NP (2019), the Chelveston cum Caldecott NP (2017), the Glapthorn NP (2018), the Higham Ferrers NP (2016), The King's Cliffe NP (2019), the Raunds NP (2017), the Rushden NP (2018), the Stanwick NP (2017), the Warmington NP (2019), the Barnwell NP (2023), the Hargrave NP (2022), the Ringstead NP (2022) and the forthcoming Gypsy and Traveller Accommodation Development Plan Document (DPD). It will replace all of the saved policies of the East Northamptonshire District Local Plan (1996) and the Rural North, Oundle and Thrapston Plan (RNOTP) (2011) and will be used as necessary to assess development proposals in the area.



12. On 1 April 2021 a number of local planning authorities in Northamptonshire merged to form two new Unitary Authorities. East Northamptonshire now forms part of North Northamptonshire Council. Nevertheless, the Plan for East Northamptonshire will remain in place until such time as it is revoked or replaced by a new plan produced by the Unitary Authority covering the whole area. Regulation 26(3) of the Local Government (Boundary Changes) Regulations 2018 requires the unitary authority to adopt such a plan within 5 years of the reorganisation date.

## Public Sector Equality Duty

13. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including amongst other things the approach to Gypsies and Travellers, affordable housing, housing mix, and older persons housing. The Plan also seeks to protect and allocates employment land (SUEs) to facilitate employment provision and also protects greenspace and community facilities.

## Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
15. The Plan seeks to implement the strategic objectives of the JCS. As such the strategic matters have already been appropriately considered within the JCS where the Duty to Cooperate was found to be met.
16. Nevertheless, it is clear that the Council has a long history of working with other authorities in the North Northamptonshire area and prescribed bodies on cross boundary issues and strategic matters. These include ongoing well established joint working arrangements and the preparation of a joint evidence base. The Council's continuing collaborative approach is set out in the Regulation 22 Consultation Statement (ED A-01). **MM1** is necessary to amend paragraph 1.23 of the Plan to provide clarity on the process that the Council has undertaken to work with statutory consultees in the interests of effectiveness.
17. I am, therefore, satisfied that there are no outstanding cross boundary issues and am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## Assessment of Other Aspects of Legal Compliance

18. The Plan has been prepared in accordance with the Council's Local Development Scheme (LDS). An updated version of the LDS was prepared in March 2022 to reflect revised timescales.

19. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement (ED B-23).
20. The Council carried out a SA of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under regulation 19. The SA included a thorough site assessment process, and an assessment of reasonable alternatives. Concerns raised by Historic England to the SA have been resolved through a Statement of Common Ground (ED-14). The appraisal was updated to assess the MM. I am satisfied that the SA is adequate.
21. The HRA (HRA) (December 2020) (ED A-03) was submitted with the Plan and subsequently updated (October 2021) following discussions with Natural England. MMs are required to the introduction of the Plan to address a number of matters raised by Natural England, in particular relating to the potential effect of development on the Upper Nene Valley Gravel Pits Special Protection Area (SPA) and Ramsar site. These amendments include: a more detailed explanation of Functionally Linked Land; reference to JCS Policy 4, the Upper Nene Valley Gravel Pits SPA Supplementary Planning Document (SPD) and the Mitigation Strategy; and additional clarification regarding the function of the 3km and 4km buffer zones for the SPA. Additional text is also included to refer to air quality assessments in support of planning applications reflecting Natural England's concerns regarding the impact of air quality and pollution on the SPA/Ramsar site. **MM2** addresses the above matters for the Plan to be legally compliant.
22. MMs are necessary in relation to a number of the site allocations and policies to ensure that there is a sufficient policy framework in place to manage potential likely significant effects in particular on the Upper Nene Valley Pits SPA and Ramsar Site. These MMs secure the necessary mitigation and are identified at the relevant sections of my report.
23. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. JCS Outcome 2 concerns Adaptability to Future Climate Change and figure 5 of the Plan sets out how this objective will be delivered within the East Northamptonshire context. Furthermore, the spatial strategy of the Plan directs development to existing, accessible settlements and policies encourage the protection and enhancement of green infrastructure.
24. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations. Based on my conclusions throughout this report, it is also consistent with JCS.

## Assessment of Soundness

### Main Issues

25. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearing sessions, I have identified ten main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

### **Issue 1 – Whether the Plan’s spatial strategy including the approach to the settlement hierarchy and settlement boundaries, is positively prepared, consistent with the JCS and national policy, justified and effective.**

#### **Spatial strategy and settlement hierarchy**

26. The spatial strategy and role of settlements is established in Table 1 and Policy 11 of the JCS. Rushden is identified as a Growth Town and the focus for infrastructure development and higher order facilities to support major employment, housing, retail and leisure development. Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston are identified as market towns which provide a strong service role for their local communities and the surrounding rural area. In these towns, the JCS establishes that growth in homes and jobs is appropriate to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town.
27. The next category is villages which includes all villages other than settlements of a dispersed form, followed by the open countryside. Dispersed settlements would be considered as within the open countryside. Development in the rural areas is limited by JCS Policy 11 to small scale infill development required to support a prosperous rural economy or to meet locally arising needs.
28. Paragraph 5.12 of the JCS states that Part 2 Local Plans may identify a more detailed rural settlement hierarchy based on local evidence in order to guide planning decisions and Neighbourhood Plans. JCS Policy 11 and Table 1 clarify that development within villages that have only a limited range of services and facilities is likely to be limited to small scale infill development and ‘rural exceptions’ affordable housing schemes, unless Local or NP identify growth as a means of sustaining or improving the range of services in the village. It goes on to say that Part 2 Local Plans may identify villages that have a sensitive character or conservation interest, in which new development would be strictly managed.
29. The Council has identified four categories of rural settlements which are set out in Table 4 of the Plan including large freestanding villages, small freestanding villages, urban outliers and restraint villages/rural outliers. Background Paper 1 (Rural Settlement Hierarchy) (C-08) explains the rationale for this approach which reflects the

differing form and character of the many villages that comprise the rural area. The Council has taken a systematic approach to the categorisation of settlements considering the availability of services and facilities, development constraints, population and built form and historic constraint in consultation with Parish Councils. Consequently, I am satisfied that the resultant settlement hierarchy is broadly consistent with the role of settlements identified in the JCS and consistent with paragraph 5.12.

30. **Policy EN1** encapsulates the spatial development strategy for the district defining the urban areas, freestanding villages and the open countryside and restraint villages. It sets out in broad terms the scale and nature of development which will be allowed in each tier of the settlement.
31. The JCS identifies Higham Ferrers as a market town which has a localised service role, with local growth pressures directed to Rushden, reflecting its close proximity to the Growth Town. However, Policy EN1 refers to Higham Ferrers in the first tier of urban areas alongside Rushden. **MM6** addresses this anomaly, placing Higham Ferrers alongside other market towns in category 1b together with an explanation of its relationship with Rushden, to be effective and consistent with the JCS. I have made a minor amendment to **MM6** post-consultation to include reference to Policy EN33 which does not alter the aim of the Policy. **MM6** is also necessary to clarify that development proposals in Oundle will deliver the allocated sites to be effective.
32. Part 2 of Policy EN1 identifies smaller freestanding villages where development will be limited to small-scale infill and windfall development. Part 2 also identifies eight large villages where infill development will be permitted and where further development of an appropriate scale will be supported where it can be demonstrated that it is necessary to fulfil a defined local need. Development beyond the extent of the built-up area will be resisted, unless promoted through a NP.
33. **MM6** seeks to differentiate the scale of development which would be permitted in the eight large, freestanding villages and the smaller villages respectively in the interests of effectiveness. I have made a minor amendment to the wording of **MM6** post-consultation to reiterate that development in the freestanding villages should generally be small scale, infill and windfall development reflecting the original wording of the policy and to be consistent with Part C of JCS Policy 11. This change is minor and indeed reflects the text in the submission draft plan and so does not alter the aim of the policy.
34. **MM6** clarifies that 'larger scale' development opportunities may be supported in the eight larger freestanding settlements where it can be demonstrated that it is necessary to fulfil a defined local need and meet the requirements of Policy EN2, as being considered as part of the built-up area or allocated in a Neighbourhood Plan. I have made a minor amendment to **MM6** to refer to 'development' as opposed to 'they' in the last paragraph of Part 2 for effectiveness. **MM6** includes a new footnote to the policy to clarify that 'larger scale development' should take into account guidance set out in

Table 18 of the Plan and development which has already taken place in the settlement in the interests of effectiveness.

35. This approach is consistent with the JCS which states that additional housing development in excess of the identified housing requirement for the rural areas will only be permitted where tested and supported through Part 2 Local Plans or NPs. The approach recognises that these villages have a substantive range of services and facilities and so may have greater capacity to accommodate additional growth. Furthermore, the policy requires any such development to meet the requirements of Policy EN2 (as amended) which would ensure that development is allocated in a local plan/NP or is within the built-up area; is not disproportionate to the settlement's size, form and range of facilities available; and would not harm the settlement's character, form, or the surrounding countryside. With the safeguards provided by Policy EN2, I consider that the approach to larger freestanding villages is justified.
36. As presented, it is not clear that rural exception schemes and small-scale employment and community-based proposals will also be supported in the large freestanding villages in addition to the smaller villages. This point is addressed by the restructuring of Part 2 of Policy EN1 which ensures that the requirements set out in the first paragraph apply to all freestanding villages. **MM6** addresses this point and is necessary to ensure effectiveness.
37. Clarification of the approach to new build residential development beyond the built-up areas of settlements and restraint villages, in addition to the approach to proposals for rural diversification or the re-use or conversion of rural buildings is necessary in part 3 of Policy EN1. **MM6** remedies the above matter in the interests of effectiveness and consistency with the JCS. I have made a minor amendment to part 3 of the policy post-consultation to recognise that development may come forward in locations beyond the built-up area of villages but only where evidenced and supported through NPs. This does not alter the aim of the policy and indeed ensures consistency with part 2b of Policy 11 the JCS. A number of consequential changes to the supporting text to Policy EN1 are required as a result of the above changes and these are set out in **MM4** and **MM5**. **MM4**, **MM5** and **MM6** are necessary in the interests of effectiveness and consistency with the JCS. A consequential change is also required to the definition of infill/windfall development in the Glossary which is set out at **MM88** for effectiveness.
38. With the above MMs I consider that Policy EN1 is consistent with the roles of settlements identified in the JCS and is positively prepared, justified and effective.

### **Approach to settlement boundaries and the built-up area**

39. The supporting text to JCS Policy 11 indicates that to clarify the application of criteria 2b and 2c of Policy 11, Part 2 Local Plans may define village boundaries or more detailed boundary criteria, taking account of the character of the village. It recognises that village boundaries can provide a tool to plan positively for growth and to prevent

ad-hoc encroachment into open countryside, particularly for villages located close to larger settlements where coalescence is a concern.

40. The Council has assessed several approaches to the definition of settlement boundaries in the Settlement Boundaries Background Paper (BP2). There is a number of existing different approaches in the Plan area ranging from defined settlement boundaries in the RNOTP and a number of made NPs to a written boundary definition such as in the High Ferrers NP and no settlement boundary at all in the Raunds NP. Where settlement boundaries do not already exist, the Plan proposes a framework for the consideration of whether a proposal is within the built-up area and to provide a framework for emerging NPs to define settlement boundaries.
41. The use of settlement boundaries to direct development may be seen as a restrictive approach; however, they provide certainty for the purposes of development. Paragraphs 78 and 79 of the Framework provide that in rural areas, planning policies and decisions should be responsive to local circumstances, support housing developments that reflect local need, locate housing where it will enhance or maintain the vitality of rural communities and identify opportunities for villages to grow and thrive. There is nothing in the Framework to suggest that those objectives cannot be achieved by planning policies which direct development to within settlement boundaries or built-up areas. Furthermore, settlement boundaries give effect to paragraph 16 of the Framework which requires that policies are clearly written and unambiguous.
42. Policies EN2, EN3 and EN4 seek to define 'settlement boundary criteria' for urban areas, freestanding villages and ribbon development respectively. However, as written, the policies appear to set out the approach to the consideration of infill development rather than defining settlement boundary criteria. Furthermore, as written the policies are confusing and there is a high degree of repetition between policies EN1, EN2, EN3 and EN4. To remedy this Policies EN2, EN3 and EN4 and the supporting text are deleted, and the principles consolidated in a single new Policy EN2 (**MM9**). The definition of a 'built-up area' is then included in the supporting text to Policy EN2 (**MM8**) to provide guidance to developers and to NPs. For clarity, Policy EN2 then sets out a series of development principles to guide the location of development. A number of consequential changes are necessary to the supporting text as a result. **MM8** and **MM9** are necessary for the policies to be effective.
43. I have made minor amendments to the wording of **MM9** post-consultation to clarify that a proposal could be either an infill site or an allocated site by the inclusion of 'or' between parts 1 and 2 of Policy EN2. A further minor amendment is necessary to clarify that all parts 2a, 2b and 2c would apply to part 2 'infill development'. Finally, clarification is necessary that parts 3 and 4 are applicable to all development. These post-consultation changes provide greater clarification and do not alter the thrust of the policy. The above changes are encapsulated in **MM7-MM13** which are necessary in the interests of effectiveness. With **MM7-MM13**, I consider that Policy EN2 is positively prepared, consistent with national policy and justified and effective.



## **Development on the periphery of settlements and the open countryside**

44. **Policy EN5** sets out the approach to development on the periphery of settlements and rural exceptions housing. **MM14** makes a number of changes to the policy as a consequence of the changes to the preceding spatial development policies referred to above in the interests of effectiveness. The title of the policy is amended to clarify that the policy relates to all settlements; not just those with a defined settlement boundary. Criterion a of the Policy recognises that development in one settlement may help to support services in a nearby settlement; however, the text is amended to provide greater clarity to ensure that it is effective. Clarification is also required in criterion b that proposals for local affordable provision will need to be evidenced by a local housing needs survey. I have made a minor amendment to **MM14** post-consultation, to remove reference to 'housing on the periphery of settlements' in paragraph 2 as this repeats the title of the policy and is unnecessary.
45. **Policy EN6** sets out the approach to replacement dwellings in the open countryside. It is necessary to include reference to the nationally described space standard in criterion e to provide clarity as to when an existing dwelling may be considered too small for modern living standards. Clarity is also required in relation to the impact of replacement dwellings on their wider setting. **MM15** addresses these points in the interests of effectiveness and consistency with national policy. Amendments to the legend of the Policies Map are also required to reflect the renumbering of the spatial policies (PM9; PM18).
46. Subject to the MMs considered above, I am satisfied that the Plan is positively prepared in this regard and that these policies are justified in their approach to development within and beyond settlements and in protecting the open countryside.

### **Conclusion on Issue 1**

47. Subject to the MMs identified above, the Plan's overall spatial strategy, including the approach to the settlement hierarchy and settlement boundaries, is positively prepared, consistent with the JCS and national policy, justified and effective.

## **Issue 2 – Whether the Plan is positively prepared, justified and effective in meeting the requirements set out in the JCS in relation to housing provision.**

### **Overall approach to housing requirement and provision**

48. Policy 29 of the JCS sets the housing requirement for East Northamptonshire at 8,400 dwellings net over the Plan period 2011 – 2031 equating to an annual average of 420 dwellings. It also establishes how it will be distributed in line with the spatial strategy and sets out housing requirements for each of the main towns and rural areas. Rushden as a growth town is required to accommodate 3,285 dwellings. Higham Ferrers (560), Irthlingborough (1,350), Raunds (1,060), Thrapston (680) and Oundle

(645) are allocated a requirement in accordance with their role as market towns. In addition, the rural areas are identified as accommodating 820 dwellings over the Plan period.

49. Whilst revising the housing requirement is not within the scope of this Plan; it must, nevertheless ensure that sufficient land is allocated to deliver the housing requirement and distribution as set out in the adopted JCS.
50. The JCS allocates strategic sites of 500 or more dwellings, identifying two Sustainable Urban Extensions (SUEs) in the area. In addition, it identifies the opportunity for a new garden village at Tresham. Alongside the SUEs, the Local Plan allocates smaller scale sites to meet housing requirements in the towns and villages. These allocations together with completions, commitments and sites already allocated in the adopted plans, are intended to meet the housing requirement in the JCS and its timescale for delivery.
51. Paragraphs 8.5 to 8.16 of the Plan set out the housing land position in 2019. Table 15 summarises the position in relation to the delivery of the major sites and Table 16 of the Plan sets out the residual requirement for the main urban areas. Table 16 shows that on 1 April 2019 the JCS housing requirements for Higham Ferrers, Raunds and Thrapston are being met, through housing completions and commitments. Outstanding residual requirements are identified at Rushden (426 dwellings), Irthlingborough (530 dwellings) and Oundle (176 dwellings). Table 17 of the Plan shows that as of 1 April 2019 the JCS housing requirement for the rural area has already been met, indeed exceeded by 43 dwellings taking account of commitments.
52. The above information has been updated to 1 April 2020 for each source of supply. The updated information shows that, taking all of the sources of supply, including major urban extensions and allocations set out in this Plan overall, 8913 dwellings would be provided. This would be 513 dwellings over the JCS requirement, equivalent to around 6% above the requirement.
53. Completions from 2011-2020 equate to 3,883 dwellings; sites under construction amount to 672 dwellings; full planning permissions and minor outline permissions equate to 373 dwellings; outline permissions for major development amount to 24 dwellings; major urban extensions (Rushden East/Irthlingborough West) equate to 1,450 dwellings. Other site allocations, such as current Local Plan allocations; 2011 RNOTP; and the 1996 District LP allocations amount to 150 dwellings; made NP site allocations equate to around 901 dwellings.
54. **MM47** and **MM93** update the housing trajectory to reflect the monitoring updates and the discussions at the hearing sessions in relation to individual sites and includes it within the Plan itself as an appendix. Furthermore, **MM48** amends the supporting text and respective tables to reflect the revised housing figures included within the updated housing trajectory. These MMs are necessary to ensure consistency with national policy and to give certainty that the Plan's approach to housing is effective.



## **Housing distribution**

### **Higham Ferrers, Raunds and Thrapston**

55. The JCS sets a target for Higham Ferrers of 560 dwellings which is already being exceeded (by 117 dwellings) through completions and commitments and dwellings on the made NP site of Ferrers School which has outline planning permission.
56. The JCS target for Thrapston of 680 dwellings has already been met (685) through completions, sites under construction and sites with planning permission with Thrapston South almost complete. Taking account of windfall sites and specific brownfield sites (88 dwellings), the JCS target for Raunds of 1,060 dwellings will be exceeded by 84 dwellings through completions (709) including on the first phase of Northdale end and sites under-construction (332), including the second phase of Northdale End. Due to the amount of housing land committed at Higham Ferrers, Raunds and Thrapston I agree that the Plan does not need to allocate further land at these towns.

### **Oundle**

57. At Oundle, there is a shortfall of 239 dwellings against the JCS target of 645 dwellings. This will be met through 70 dwellings on the Ashton Road/Herne Road (Phase 2) allocation of the RNOTP, three proposed site allocations in the Local Plan at St. Christophers Drive; Cotterstock Road and Stoke Doyle Road and brownfield sites (31). Since the base date of 1 April 2020 two of the three Local Plan site allocations have been granted planning permission – 130 dwellings at Cotterstock Road/St Peter's Road (Policy EN26) and 130 dwellings (including 65 Extra Care Units) at St Christopher's Drive. These sites are discussed later in this report. With these site allocations the target will be exceeded by 189 dwellings. Overall, there would be a slight over supply in Oundle of 189 dwellings.

### **Irthlingborough**

58. The JCS sets a target of 1,350 dwellings for the Plan period, largely focussed on the Irthlingborough West Sustainable Urban Extension (SUE). Taking account of completions (347), sites under construction (4); commitments in the form of planning permissions (145) there would be a shortfall in Irthlingborough of 854 dwellings. It is proposed to partly meet this shortfall through an existing DPD allocation at Addington Road (80); unallocated brownfield sites and sites at Green Close, Wellingborough Road and rear of Nicholas Road (all of which have planning permission). Nonetheless, even taking these into account, there would be a shortfall against the target of around 574 dwellings.
59. The shortfall is largely due to uncertainties around the delivery of the SUE, which is discussed at paragraph 75 below. It is envisaged that around 200 dwellings would be

delivered on the SUE within the Plan period; with the remaining 500 dwellings being delivered beyond the Plan period.

## Rushden

60. The JCS sets a target of 3,285 dwellings for the Growth Town of Rushden. Almost a third of this has already been met through completions (1,055), dwellings under construction (43) or with planning permission (132); a number of allocations in the Rushden Neighbourhood Plan amounting to 465 dwellings. It is anticipated that 1,050 dwellings will come forward on the Rushden SUE which is discussed below. A further 134 dwellings will come forward on specific unallocated brownfield sites within the urban area, resulting in a residual requirement of 406 dwellings. However, the proposed allocation of 450 dwellings at Land East of the A6 Bypass/Bedford Road would meet this shortfall resulting in oversupply of 44 dwellings against the requirement. This site is discussed under Issue 4 below.
61. Consideration is needed in relation to a number of factors concerning housing provision as follows:

## Sustainable Urban Extensions (SUEs)

62. In accordance with the spatial strategy set out in the JCS, the two SUEs are relied upon to deliver a significant proportion of the overall housing requirement. For the Plan to be effective these, along with additional housing sites proposed, must be capable of meeting identified needs over the Plan period.
63. The two SUEs within the District are capable of providing around 3,400 dwellings and accompanying jobs, facilities and services at two SUEs within the District. However, delivery at these sites has been lower than anticipated to the extent that only around 1,450 dwellings are now anticipated to come forward within the Plan period. Around 1,250 dwellings of these are anticipated at Rushden East and around 200 dwellings at Irthlingborough West. **MM56** and **MM65** update the figures for the delivery of the SUEs based on 2020 monitoring information in the interests of effectiveness.

### *Rushden East*

64. JCS Policy 33 makes provision for the development of around 2,500 dwellings at Rushden East which has increased to 2,700 dwellings in this Plan. The JCS assumed that around 1,600 dwellings could be delivered by 2031. This has subsequently been revised downwards and is currently forecast to deliver 1,250 dwellings by 2031. The SUE will also support job creation through dedicated business, 2 local centres and opportunities for working and starting a business at home. Issue 4 below considers the boundary for the SUE and the detailed criterion set out in Policy EN33 (as amended).

65. In terms of delivery, planning applications have been submitted for the majority of the SUE land which is in the control of a volume housebuilder consortium. The Masterplan Framework Document (MFD) shows an area of 'grey land' which falls outside the land controlled by the consortium and is under a range of different ownerships. This land would come forward as a future development phase. Phasing proposals together with the sequence for delivery of the key elements of infrastructure will need to be set out by developers. Completions are likely to commence 2024-25 on phases 1-3 with a delivery rate of 100 dwellings per annum (dpa) in the first year, followed by around 150 units, thereafter. Phase 4 is likely to commence in 2026-27 at a rate of around 50 dpa. Given that the site will be delivered by several developers, I consider that the contribution that the SUE will make to the overall land supply for the Plan area is realistic.

### *Irthlingborough West*

66. Irthlingborough West SUE is shown as a committed SUE on the North Northamptonshire JCS Key Diagram. JCS Policy 29 directs development to the committed and proposed SUEs and other strategic housing sites. A resolution to grant permission for Irthlingborough West was initially agreed by the Council in 2014 subject to a Section 106 Obligation. Since then, ongoing and protracted negotiations have made limited progress, largely due to development viability as a result of costs associated with ground stability mitigation arising from the former mine workings. Considering the ongoing uncertainties, the Council has revised the trajectory and assumes that development will not start until 2027/2028 at a rate of around 50 dpa equating to 200 dwellings in the Plan period. I consider that the updated figures provided in **MM65** are a realistic estimate of the projected output from this site. **MM65** is required in the interests of effectiveness. I assess below how the shortfall in housing supply as a consequence of the delay to delivering the SUE's will be met.

### **Meeting the Irthlingborough and District Shortfall**

67. The Council recognises that delays to housing delivery in respect of the two SUEs at Irthlingborough and Rushden East have raised potential difficulties in meeting the housing trajectory as set out in the JCS Appendix 4 (ED B-01), with some housing development at those locations now expected to be completed beyond the JCS plan period.
68. The Additional Housing Sites Assessment papers (Exam G-09 and G-10) looked at a range of sites in Rushden and Irthlingborough to meet the shortfall; however, the Irthlingborough sites were found to perform badly in terms of sustainability and deliverability.
69. An additional site is, therefore, proposed for 450 new homes on land to the east of the A6/Bedford Road. The allocation is proposed within the Growth Town of Rushden which the JCS identifies as an area that will be expected to deliver significant development. Growth Towns are the primary focus for new housing and employment, and they provide a greater range of services and infrastructure. The allocation would,

therefore, be situated in a sustainable location for further development and one which is consistent with the JCS.

70. The additional site would meet the shortfall in Rushden resulting in a surplus of 44 dwellings in the town which in combination with the surplus of 247 dwellings in Higham Ferrers and 84 dwellings in Raunds would meet the Irthlingborough and overall shortfall.
71. Table 5 of the JCS sets out the proposed distribution of dwellings within each settlement. Paragraph 9.10 of the supporting text states that Part 2 Plans may assess higher levels of housing provision in individual settlements where it meets identified local needs and aspirations or, in the case of Growth Towns and Market Towns, would meet a shortfall in deliverable sites at another settlement within the same Part 2 Local Plan area. This provides the flexibility required for this Plan to 'off-set' housing delivery between the four towns of Rushden, Higham Ferrers, Irthlingborough and Raunds. The four towns have a good range of services and facilities and are sustainable locations for new development.
72. Furthermore, the proposed 'off-setting' would not result in an increase in housing provision overall and would not, therefore, have a greater impact on the Upper Nene Valley Gravel Pitts SPA/Ramsar site. Consequently, the Council's proposed approach is consistent with the JCS. Moreover, the Council has taken a proactive approach to meeting the shortfall by identifying an additional site to ensure that it remains 'on-track' to meet the JCS housing requirement for the area. Consequently, the Plan's approach is positively prepared, justified, effective and consistent with the JCS.

### *Rural Area*

73. Policy 11(2)(a) of the JCS states that development in the rural area will be limited to that which is required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement. The JCS sets out an overall rural housing requirement for the district of 820 dwellings in the Plan period 2011-2031. Table 1 of the JCS anticipates that 'Development within villages that have only a limited range of services and facilities is likely to be limited to small scale infill development and 'rural exceptions' affordable housing schemes, unless Local or NPs identify growth as a means of sustaining or improving the range of services in the village' .
74. As set out in Background Paper 10 (2020 update) – Housing requirements: Rural areas (July 2021) Rural Housing Background Paper (BP10; ED G-04) (as updated), a significant proportion (70%) of the target has already been met through completions (578) and a further 124 dwellings are either under-construction or have detailed or outline planning permission. NP allocations in Brigstock, Chelveston-cum-Caldecot, Glapthorn, Kingscliffe, Nassington and Warmington account for a further 136 dwellings together with 58 dwellings on emerging allocations and windfall sites. Overall,

identified provision in rural areas would be 896 dwellings, 76 dwellings above the JCS target. On this basis, the Plan does not allocate any further land for development.

75. It is anticipated, however, that modest, small-scale windfall would come forward during the Plan period and so a windfall allowance of 41 dpa has been included to reflect this. Consequently, there would still be some development coming forward in the rural areas, in areas without a made or emerging NPs. This would provide an additional 369 dwellings over the remaining Plan period 2022-2031. At my request, the Council provided additional evidence regarding windfall development which demonstrates that from 2016 to 2020 the windfall rate in rural areas has averaged 48 dpa. Consequently, I consider that the windfall rate is realistic.
76. Paragraph 66 of the Framework states that strategic policies should also set a housing requirement for designated neighbourhood areas which reflects the overall strategy and pattern and scale of development and any relevant allocations. Paragraph 67 goes on to state that where it is not possible to provide a requirement figure for a neighbourhood area the local planning authority should provide an indicative figure which should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.
77. Whilst the JCS requirement for the rural area of East Northamptonshire will be met, it is recognised that this is not a maximum figure and that further housing may come forward in rural areas through windfalls, specific brownfield sites and also may be proposed in NPs.
78. Table 18 of the Plan sets out a rural housing need for Parish Council areas of a particular scale in terms of population. As the rural housing requirement will be met, the figures are intended as indicative guidance for potential/emerging NPs in terms of helping them to meet future housing need, as opposed to a policy requirement. It would be in addition to the housing requirement.
79. Annex 1 of BP10 explains how the indicative figures have been arrived at. The methodology utilises the 2011 Census figures for the population of rural parishes which corresponds to the start of the Plan period. The Census individually lists parishes with populations of greater than 100 which is the basis for the apportionment of the 820 dwellings rural housing requirement. An indicative growth figure is applied to each figure based on the apportionment, which is set out at Annex 1. Whilst relatively simple, the Council has undertaken a systematic and proportionate approach to identifying indicative rural housing need figures for the parishes. The approach is a pragmatic one which provides some scope for parish councils/communities to allocate further housing sites through NPs if there is a local desire to do so. Furthermore, the approach provides additional flexibility in terms of meeting the housing requirement.
80. **MM48** is necessary to incorporate updated housing figures to 1 April 2020 within the supporting text and Table 17 which summarises the residual housing requirement for

the rural areas. With **MM48**, I consider the approach to meeting the housing requirement in the rural areas is positively prepared, justified, effective and consistent with the JCS and the Framework.

## Flexibility

81. Overall, the Plan provides for around 8913 dwellings; 513 dwellings over and above the JCS target of 8,400 dwellings. Specific brownfield sites are identified in the housing trajectory as a source of meeting the housing requirement where these have been previously identified, for example, by way of a planning application. Whilst an allowance has been made for windfalls in rural areas; a specific urban windfall allowance has not been identified. Nonetheless, additional evidence provided by the Council shows that around 70 dwellings per annum have been provided on average between 2016 and 2020 in the urban area which whilst not required to meet the housing requirement, nevertheless, provides additional flexibility.
82. There is some potential for double counting between the specific brownfield sites identified in urban areas and potential further windfall development in urban areas. However, even excluding windfall development for the first five years of the remaining Plan period windfall development in urban areas could account for a further 420 dwellings from 2025-2031. In addition, rural windfall could amount to a further 369 dwellings over the remaining Plan period (41 dpa 1 April 2022-31).
83. Furthermore, additional NPs could come forward within the Plan period which could allocate further housing sites. Additionally, development may come forward beyond settlement boundaries or the built-up area in the form of rural exception sites, the approach to which is set out in JCS Policy 13 and Local Plan Policies EN1 and EN2.
84. Tresham Garden Village was envisaged in the JCS to be additional to the housing target for the district. With a potential 1,500 dwellings the site has potential to deliver some housing in the district contributing to a range of types of housing and providing flexibility in the housing market. Moreover, development on the two SUE's could come forward sooner than anticipated.
85. Paragraph 69 of the Framework requires development plans to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Section 4 of the Rural Housing Paper (ED G-04) summarises evidence which demonstrates that around 23.2% of housing land supply can be accommodated on sites of less than 1ha. **MM46** is necessary to ensure that this is recognised in the Plan for effectiveness and consistency with national policy.
86. Taking the above into account, I consider that the Plan provides sufficient flexibility to meet the JCS requirement and provide a range and choice of housing sites in locations which are consistent with the JCS spatial strategy.



## **Conclusion – Issue 2**

87. Overall, subject to the MMs referred to above and for the reasons given, I find that the Plan is positively prepared, justified and effective in meeting the requirements set out in the JCS in relation to housing provision.

## **Issue 3 – Whether the Plan is positively prepared, justified, effective and consistent with national policy and the JCS in terms of meeting other housing needs.**

### **Affordable Housing**

88. JCS Policy 30 takes account of the need for affordable housing in the context of viability considerations and sets targets of 30% on sites of 15+ dwellings in Growth Towns and Market Towns, excluding Oundle, 20% in the SUEs and 40% on sites of 11+ dwellings in the rural area plus Oundle. JCS Policy 13 also enables the provision of affordable housing on exception sites and allows affordable housing which meets locally defined need located adjacent to settlement boundaries in the rural area. Policy EN5 (as modified) reflects this approach. Furthermore, the site allocations in the Plan will contribute to meeting the affordable housing requirement set out the JCS.
89. The Plan provides opportunities for development to come forward on windfall/infill sites within settlement boundaries and/or the built-up area. Furthermore, opportunities exist for further housing development on sites which may be allocated within NPs and also on rural exception sites.
90. At my request, the Council has set out the actual number of affordable housing completions between 2011-2021. This shows that overall, 1,167 affordable dwellings have been provided between 2011-2021, equating to around 30% of the total number of additional dwellings in the same period (3,882 dwellings). This demonstrates a clear track record of delivery. Furthermore, opportunities will exist in the remaining years of the Plan to secure further affordable housing. On this basis, I am satisfied that the Plan is effective in delivering affordable housing required for the District by the JCS. It is, therefore, positively prepared, justified and effective in this regard.

### **First Homes**

91. The Government's policy on First Homes came into effect on 28 June 2021, pursuant to the Written Ministerial Statement of 24 May 2021. However, that Ministerial Statement explains how plans submitted for Examination before 28 June 2021 are not required to reflect First Homes policy requirements, as is the case here. In my view, review provisions and statute will provide appropriate opportunity for consideration of First Homes in time.

## **Gypsies and Travellers and Travelling Showpeople**

92. Paragraph 61 of the Framework requires planning policies to reflect an assessment of the size, type and tenure of housing needs for different groups, including Gypsies and Travellers. The National Planning Policy for Traveller Sites (March 2015) (PPTS) requires local planning authorities to plan positively for the needs of Travellers, to robustly assess needs and to identify criteria to guide land supply where there is an identified need.
93. Paragraph 9.52 of the JCS identifies a need for 7 residential pitches, 3 transit pitches and 4 plots for Travelling Showpeople in the East Northamptonshire area based on the 2011 Northamptonshire Gypsy and Traveller Accommodation Assessment (GTAA). However, the most recent GTAA (2019) (Exam G-18) identified no Gypsy and Traveller households who met the planning definition, 67 undetermined households who may meet the planning definition and 6 households who did not meet the planning definition. Four Travelling Showpeople households were identified who met the planning definition.
94. The GTAA acknowledges that there is a high proportion of undetermined need. This is due to being unable to undertake interviews on 3 private sites as the owners refused access to the sites, although some interviews were completed off-site. The site owners confirmed that they are able to meet all current and future need on their sites through the existing planning consents.
95. Due to the large number of pitches on the 3 sites where an interview was not possible, it is likely that a proportion of these would meet the planning definition. It has, therefore, sought to estimate the proportion of those undetermined households who would meet the planning definition. It did this by applying a household formation rate of 1.50% to the household base of 67 which resulted in an additional future need of 17 pitches to 2033. Experience and data that has been collected from over 3,500 household interviews that have been completed by Opinion Research Services (ORS) since the changes to PPTS in 2015 suggest that nationally approximately 25% of households that have been interviewed meet the planning definition suggesting that only a proportion of potential need from undetermined households will need pitches. The GTAA estimated that applying the national averages of households who meet the definition the undetermined need could result in a need for 4 pitches.
96. East Northamptonshire currently has no public sites but has 3 private sites with permanent planning permission for 72 caravans and 1 Travelling Showpeople's yard with 4 plots. During the preparation of the GTAA, the site owners confirmed that they are able to meet all current and future need on their sites through the existing planning permissions. Furthermore, the Council indicated that there are usually vacancies on some of the sites in the area. As the requirement for 4 pitches is small, the Plan states that there is no need to allocate further sites. It goes on to say that if future proposals are forthcoming, Policy 31 of the JCS provides a clear steer for considering any planning applications which may arise. Whilst this may be the case, I am mindful that there is a high level of undetermined need in the district and that the need arising from



this may be somewhere between 4 and 17 pitches. Furthermore, the Plan ought to address the identified need, even though it may be small.

97. A new GTAA for the North Northamptonshire area is currently being prepared in order to inform the preparation of a Gypsy and Traveller Site Allocation Policy DPD for North Northamptonshire. This DPD will allocate sites to meet the small, identified need. Whilst the preparation of a separate DPD pushes the timetable for the consideration of this important issue onwards, I appreciate that the alternative approach of addressing this matter in the Plan would have risked considerable delay.
98. The timetable for the preparation of the DPD is set out in the LDS which indicates that consultation on a publication draft plan will take place in September 2023 with adoption planned for December 2024. Given the commitment to prepare the DPD in the LDS in a timely manner, I consider that this is the most positive and effective way to ensure that the needs of Gypsies and Travellers and Travelling Showpeople are met alongside the other wider development needs in the Plan area.
99. In the meantime, JCS Policy 31 sets out the criteria to be applied to planning applications for Gypsy and Traveller accommodation and is referred to in paragraph 8.98 of the Plan. **MM64** is necessary to demonstrate that the Plan is positively prepared as it amends paragraph 8.98 to clearly signal the Council's commitment to the preparation of the DPD. **MM64** is also required to ensure that Table 21 and paragraph 8.93 are factually correct and thereby effective. The above MMs are necessary in the interests of effectiveness. On this basis, I find that the Plan is positively prepared, consistent with national policy and the JCS, justified and effective with regards to Gypsies and Travellers and Travelling Showpeople.

### **Policy EN29 Delivering Wheelchair Accessible Housing**

100. Policy 30 of the JCS provides for local authorities to set the proportion of Category M4 (3) (wheelchair user dwellings) based on evidence of local needs. Policy EN29 of the Plan seeks to set a requirement for all new housing development to include 5% of 'Category 3 wheelchair accessible housing'.
101. The Guidance (paragraph 002 Reference ID: 56-002-20160519) states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by building regulations in respect of access. Local Planning Authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. It goes onto list potential sources of evidence which could be taken into account.
102. The Council utilised evidence of need for accessible housing from the housing waiting list and evidence of the proportion of people living in East Northamptonshire with a disability, mobility issue or who are a wheelchair user. In July 2018 there were 157

households on the East Northamptonshire Council housing register with a mobility need, with 37 needing wheelchair accessible accommodation. The East Northamptonshire Keyways Housing Allocation Register shows 98 households with a mobility need and 11 specifically requiring accommodation suitable for a wheelchair. Furthermore, there are likely to be considerably more people in the East Northamptonshire area requiring wheelchair accommodation who either do not require or qualify for affordable housing.

103. The Council have calculated that utilising an apportionment of national and regional numbers of people with a disability, mobility issue and wheelchair users from the Department for Work and Pensions Family Resources Surveys 2015/16 and 2016/17 and NHS England and applying these to the population of East Northamptonshire, which was around 93,135 in 2017, it was estimated there are 23,284 people with a disability (25% of the population); 10,803 with a mobility issue (11.6%); and 1,676 wheelchair users (1.8%) of whom 1,116 (66%) are regular users.
104. The Council also point to further evidence of the need for wheelchair adapted properties contained in the Rushden East Housing Need Study (2019). The study identified around 11,400 households in East Northamptonshire with one or more persons with a limiting long-term illness or disability, 3,567 of which affect their housing need. This study concludes that an additional 580 wheelchair adapted properties are required across East Northamptonshire between 2019 and 2031, of which 100 are for people aged under 75 and 480 for people aged 75 and over. The study concludes that many of these could be in specialist housing for older people.
105. At my request the Council has provided additional evidence regarding wheelchair accessible housing in the Council's existing stock. This shows that out of a total stock of 5,877 properties, only 350 (6%) have any adaptation and many of these are minor. This evidence demonstrates the lack of adaptable and accessible housing in the social and affordable stock.
106. The impact of the requirement on viability has been assessed in the East Northamptonshire Local Plan Viability Assessment (VA) (January 2021) (ED B-13). It concludes that the requirement set out in Policy EM29 has a limited impact on viability, with residual land values typically reducing by around 0.5%.
107. Policy EN29 as written would require all new housing developments to provide a minimum of 5% 'Category 3 (wheelchair accessible) housing'. However, on sites of less than 20 dwellings the requirement would be less than one. Consequently, **MM59** sets a threshold of 20 dwellings to ensure that the policy is effective. **MM59** also amends the policy to refer to a 'target' of 5% as opposed to a 'minimum' to provide flexibility and ensure effectiveness. Furthermore, it is necessary to include reference to wheelchair accessible and adaptable housing to reflect the differentiation set out in Part M of the Building Regulations.

108. As presented, the Policy fails to reflect the Guidance which states that policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. **MM59** addresses this issue. I have made a minor amendment to **MM59** post-consultation to provide greater distinction between Category 3 (a) (wheelchair adaptable) and Category 3b (wheelchair accessible) housing. Similarly, I have added **MM59a** to amend the supporting text for the same reason. A corresponding minor amendment is made to **MM87** to align the monitoring indicators and targets. These amendments do not alter the original aim of the policy. **MM59**, **MM59a** and **MM87** remedy these issues in the interests of effectiveness.
109. On the basis of the above, I consider that there is sufficient evidence to justify the inclusion of a 5% target for wheelchair accessible or adaptable housing. Furthermore, with **MM59** and **MM59a**, the policy is justified, effective and consistent with the JCS and national policy.

### **Policy EN30 Housing Mix and Tenure**

110. JCS Policy 30 seeks to ensure that new development provides a mix of dwelling sizes and tenures to cater for current and forecast accommodation needs, taking account of the need to accommodate smaller households and the composition of the existing stock. Policy 30 of the Plan provides local policy direction based on local evidence which shows that there are significant spatial differences in housing needs. In the rural north there is a general need for smaller houses, while in the south the need is predominantly for larger properties. This approach is broadly consistent with the Framework and the JCS; however, it is necessary for the policy to refer to the need to provide evidence to support the proposed housing mix of proposed developments, particularly where this may depart from the evidence in the Strategic Housing Market Assessment (SHMA) or local evidence. **MM60** remedies this matter, providing flexibility in the interests of effectiveness.

### **Policy EN31 Older People's housing provision**

111. Policy EN31 seeks to provide additional local detail to Policy 30 of the JCS to ensure that the accommodation needs of older people in the Plan area are met. A tailored approach is set out for each tier of the settlement hierarchy reflecting development potential in those settlements and a lack of provision in the north of the area and the villages. The approach reflects the characteristics and needs of different locations within the area. Accordingly, I find it is justified and consistent with the Framework and Policy EN30 of the JCS. However, several amendments are required to ensure that the policy is effective.
112. **MM62** is necessary to provide flexibility reflecting that there may be locations where such provision is not appropriate and where provision may have an adverse impact on viability. **MM62** alters the third bullet point of the policy to refer to a minimum of 20% of housing for older people to align it with the remainder of the policy and the JCS and to

provide flexibility. I have made a minor post-consultation amendment to the third bullet point of **MM62** referring to evidence justifying a 'different approach' as opposed to 'departure', reflecting that 'departure' has a particular meaning in planning terms. **MM62** is, therefore, necessary for effectiveness.

113. The draft policy sets out a detailed description of the type of housing which could be included to meet provision for older people. These include the types of specialist housing for older person's set out in the Guidance (Paragraph: 010 Reference ID: 63-010-20190626). Reference is also made to 'downsizing' including accommodation such as bungalows, apartments and other smaller homes which are available to meet general needs but are suitable to facilitate independent living for older people. This approach is consistent with the Guidance which recognises that many older people may not want or need specialist accommodation. Rather, they may wish to move to general housing that is already suitable such as bungalows or homes which can be adapted to meet a change in their needs and allow them to live independently and safely in their home for as long as possible or to move to more suitable accommodation if they so wish.

114. Nonetheless, the description of the type of housing is very detailed and **MM61** and **MM62** amend the policy by moving some of this detail to the supporting text in the interests of effectiveness. **MM91** makes a consequential change to Appendix 5 for effectiveness. The VA concludes that the Council may need to take a flexible approach to the form of older person's housing where viability issues are already present. Policy EN31 provides the required flexibility. With **MM61**, **MM62** and **MM91**, I consider that Policy EN30 is positively prepared, justified, effective and consistent with the NPPF and the JCS.

### **Policy EN32 Self and Custom Build Housing (SCBH)**

115. The Self-Build and Custom Build Housebuilding (SCBH) Regulations 2016 requires councils to grant planning permission for enough serviced plots to meet the demand for SCBH in their area within three years. JCS Policy 30 (g) supports proposals for individual and community custom build developments that are in line with the spatial strategy and states that SUE's and other strategic developments should make available serviced building plots to facilitate this sector of the market. Policy EN31 seeks to expand on this approach providing greater local emphasis. It requires housing developments of 50 or more dwellings to provide 5% of plots to be made available as self or custom build serviced plots.

116. The Council maintains a register of individuals and associations who are seeking to acquire serviced plots of land which provides a useful starting point to assess the demand for this type of development. In addition, the Council commissioned further work in the form of the East Northamptonshire Custom and Self-Build Demand Assessment Framework (ED G-14) (2018). Background Paper 11 (ED G-16) contains the Council's own evidence in relation to SCBH demand and develops the spatial policy approach to SCBH in the Plan.

117. The Assessment Framework identified a need for around 39 dpa for SCBH. It compared this to the number of dwellings being delivered in the district through 1 and 2 dwelling sites which averaged 28 dpa, leaving an annual shortfall of 11 dwellings per annum equating to 143 additional SCBH units over the Plan period. Consequently, whilst 28 SCBH units are likely to be delivered through single dwellings minor/infill plots per annum; the Council propose to deliver the remaining 11 dpa through the policy mechanism set out in Policy EN31.
118. The Council considered the remaining sites in the Plan which are identified as being for 50 or more dwellings up to 2031 which are expected to yield 3305 dwellings over the 13 years (G15). It then assessed the implication of applying a 4%, 5% and 6% target to those sites. At my request the Council updated this scenario assessment to take account of the current position regarding all housing sites and to also include the A6/Bedford Road site.
119. This updated analysis demonstrated that a 4% target would not achieve the required shortfall. A 5% target would achieve the target providing around 177 dwellings. Whilst this is slightly higher than the residual requirement of 143 dwellings it would allow for flexibility for example in circumstances where viability may exclude the provision of SCBH on particular sites.
120. In terms of viability, the VA concludes that the requirement should be cost neutral for developers as they will receive an equivalent value for the plots than they would have received had they built and sold the houses themselves.
121. The Policy proposes a 12-month marketing period; however, I consider that this could result in logistical problems for developers if they need to return to the site to build out any such plots which have not been taken up. Consequently, it is necessary to amend this to reflect a 6-month marketing period in the interests of effectiveness. Sites of less than 50 dwellings could also contribute to the supply of SCBH and an additional paragraph is added to the policy in recognition of this. **MM63** addresses these matters in the interests of effectiveness.
122. Overall, with **MM63**, I consider that the policy is positively prepared, justified, effective and consistent with the national policy and the JCS.

## Conclusion

123. Overall, subject to the MMs referred to above and for the reasons given, I find that the Plan is positively prepared, justified, effective and consistent with national policy and the JCS in terms of meeting other housing needs.



## **Issue 4 – Whether the Housing Allocations are positively prepared, justified, effective, consistent with national policy and the JCS and deliverable/developable.**

### **Site Selection Process**

124. Background Paper 9 (BP9) – Housing Requirements: Urban Areas (2021) (ED-G03) and Background Paper 10 – Housing Requirements: Rural Areas (2021) (ED G-04): set out the housing land supply position on 1 April 2019, subsequently updated to January 2021. As explained at Issue 2, the JCS housing requirements for Higham Ferrers, Raunds and Thrapston have been met. Consequently, other than for the brownfield sites discussed below, no further allocations are made in these towns.
125. Given the identified shortfall in housing land in Rushden and Irthlingborough, the Council undertook additional work to identify further housing land utilising the Strategic Housing Land Availability Assessment (2013) as a starting point. This work is documented in the Additional Housing Site Assessments Local Plan Part 2 (ED G-09), BP 9 (ED G-03) and its subsequent update, and the Technical Paper – Assessment of Alternative Site Option – Rushden (September 2020) (ED G-10). Detailed site assessments of alternative site locations have been undertaken, using a matrix linked to the SA objectives of the Plan. The views of infrastructure providers were considered along with responses from an additional consultation exercise. The proximity of land to the West of Rushden Lakes and the Irthlingborough sites to the SPA of the Upper Nene Gravel Pits effectively ruled out those sites.
126. The location of the proposed additional site – Land east of the A6/Bedford Road, Rushden (EN28) aligns with the JCS spatial strategy directing development to the growth town and is, therefore, acceptable in principle. I consider the site in more detail below.
127. In order to meet the shortfall of housing land supply at Oundle, the Council undertook a number of assessments of potential site options for the town. This iterative process is set out in the Local Plan Part 2 Background Paper -Oundle Site Assessments (ED G-05) and Sustainability Appraisal: Interim SA Report -Strategic Options for Oundle (both 2018). These involved an initial sieve of sites, followed by a more detailed assessment of shortlisted sites, including against the SA objectives of the Plan.
128. Subsequent additional work was undertaken by consultants on behalf of the Council which involved an independent reassessment of the sites (Oundle Site Assessment-Detailed Reassessment of Shortlisted Sites [ED G-07] (2019). This process culminated in the selection of three sites which are proposed for allocation in the Plan. Two sites (Cotterstock Road and St Christopher's Drive) have received planning permission, whilst the Stoke Doyle Road site was supported in the Oundle NP (although the NP did not progress to referendum).

129. I consider that the Council has undertaken a thorough site assessment process, which clearly identifies the reasons for selecting the preferred site and rejecting others, taking account of potential constraints, infrastructure requirements and necessary mitigation measures. Consequently, I am satisfied that the methodology for selecting sites in the Plan is logical, justified and consistent with national policy.

### **Housing Allocations in Oundle**

130. Policy EN24 lists the housing allocations proposed for Oundle and includes a set of generic criteria to be considered for each of the sites. However, the criteria repeat the site allocation policies and other policies in the Plan and so the policy would not be effective. **MM49**, therefore, deletes the policy to remedy this matter for clarity and, therefore, effectiveness.

### **Policy EN25 Land rear of Cemetery, Stoke Doyle Road, Oundle**

131. The site is situated to the rear of the cemetery and to the north of Stoke Doyle Road. It is identified for around 70 dwellings which would contribute to meeting the strategic housing need for Oundle, providing a range of housing including self-build and affordable housing. The site would also deliver improvements to the local highway network through the provision of traffic lights on Warren Bridge. Furthermore, the policy requires land to be set aside to allow for the extension of Oundle Cemetery to meet future requirements.

132. The site is within two ownerships. The larger part of the site has a full planning application pending for 53 dwellings which would be delivered by a house builder. Permission in principle exists for 9 dwellings for the smaller part of the site and a further planning application is anticipated. In terms of viability, there may need to be some flexibility in terms of the percentage of affordable housing which can be delivered on the site. Nevertheless, given the active developer interest in the site, I consider that it is likely to come forward within the first 5 years of the Plan.

133. **MM50** is necessary for effectiveness to ensure that the supporting text includes reference to the need for a wintering bird survey and evidence that any development would not have a significant likely effect on the Upper Nene Valley Gravel Pits SPA.

134. Figure 14 shows the extent of the site together with arrows pointing to land which has longer term development potential. **MM51** removes these arrows so as not to fetter future decision making. **MM52** removes reference to 'other policy requirements' in criterion b, as this is vague and unnecessary given that the Plan should be read as a whole. Both **MM51** and **MM52** are required in the interests of effectiveness. With these MMs, I consider the allocation to be justified.

## Policy EN26 Cotterstock Road/St Peter's Road, Oundle

135. The site is situated to the north of Oundle, east of Cotterstock Road and north of St Peter's Road. The site is proposed to be allocated, and indeed has full planning permission, for up to 130 dwellings, including 4 self-build units and 40% affordable housing.
136. The site is not identified in the Glapton NP (made 2018); however, this would not preclude the site coming forward. The proposed development would contribute to meeting the strategic housing need for Oundle and deliver a range of types of housing including affordable and older persons' housing. The main access is likely to be off Cotterstock Road, which raised some concerns regarding potential traffic impacts at school drop/off and pick up times; however, this matter has been resolved through the detailed planning application. Enhanced connectivity will be provided to the adjacent public rights of way, providing access to the Nene Valley and nearby villages. Net biodiversity gain could be provided both on and off site including enhanced management for existing local wildlife sites.
137. Furthermore, drainage will be managed by the provision of a sustainable drainage system including improvements to west/east drainage capacity between Cotterstock Road and the River Nene to the east. **MM54** introduces an additional criterion to ensure that suitable access is safeguarded for the maintenance of foul drainage infrastructure, reflecting the presence of an existing foul sewer within the site. **MM54** introduces a further criterion to ensure that dwellings are located at a suitable distance from Oundle Water Recycling Centre to protect the amenity of future occupiers. Structural landscaping along the boundary with the Recycling Centre will also help to mitigate the impact of smell or other pollution. Consequential amendments are necessary to the supporting text at paragraph 8.29 to explain these matters which is addressed by **MM53**. **MM53** and **MM54** are necessary to ensure that the allocation is justified and effective.
138. It is anticipated that the site will come forward within the first five years of the plan which given the planning status of the site is realistic. With the MM's identified above, I consider the allocation to be justified.

## Policy EN27 St Christopher's Drive, Oundle

139. The site has outline planning permission and two reserved matters applications for 130 units, comprising 65 affordable units in an Extra Care Facility, 62 market dwellings and three custom/self-build plots, making a significant contribution to the strategic housing need for Oundle including meeting the needs of older persons.
140. The mature landscaping on the northern, eastern and southern boundaries would help to contain the development from the wider landscape to the east as well as urban influences to the north and south. Furthermore, as additional landscaping matures the



effect on the character of The Nene-Thrapston to Cotterstock Landscape Character Area would be minor. Connections will be provided to the adjacent Public Rights of Way network, providing access to the Nene Way and adjacent villages.

141. **MM55** introduces an additional criterion and footnote to ensure that the design and layout of the scheme reduces the risk of nuisance or odours from the Oundle-Ashton Gate Terminal Pumping Station and reflects the minimum distance of 15m between the station and the curtilage of the nearest dwellings required by Anglian Water.
142. The site is situated adjacent to the A605 and criterion e requires structural landscaping to mitigate the impact of noise and other pollution from the road. **MM55** requires the deletion of the reference to the potential of an emergency access via Ashton Road in criterion c, reflecting the planning permission.
143. **MM55** also amends the reference in criterion b to extra care provision as opposed to more generally meeting older persons' needs to reflect the planning permission in the interests of effectiveness.
144. The developer has confirmed that the site is viable and that the site is likely to come forward within the first five years of the Plan. Given the planning status of the site, I consider this to be a reasonable position. **MM55**, is necessary for the policy to be effective and to secure a satisfactory standard of development. With this MM, I consider the allocation to be justified.

## **Housing Allocations in Rushden and Higham Ferrers**

### **Policy EN33 - Rushden East SUE**

145. Policy JCS 33 identifies a broad area of search and policy requirements for the SUE with the expectation that detailed boundaries will be determined through a master-planning exercise. The Plan seeks to provide detailed boundaries for the SUE as set out in Figure 18. The detailed boundary goes beyond the arc set out in the JCS to the south-west of Rushden. In determining the boundaries, the Council has taken account of the findings of the Rushden East Landscape Capacity Assessment and Capacity Study (ED H-03) (2014) which considers the landscape sensitivity and capacity of a large area of land to the east of Rushden. The allocation excludes areas which were identified as having a 'low' or 'medium-low' capacity to accept development. The Council has taken a systematic approach to determining the detailed boundaries of the SUE which I consider to be justified.
146. A detailed MFD for the SUE is contained at Appendix 6 of the Plan. However, the MFD and associated figures/plans are overly prescriptive to be included in the Plan and would not provide sufficient flexibility for the delivery of the SUE. In addition, as presented Policy EN33 adds little to Policy 33 of the JCS. Therefore, at my request, the key economic, environmental, and social planning requirements have been

extracted from the MFD and added to Policy EN33 as set out in **MM66** for effectiveness. Appendix 6 which contains the MFD is deleted by **MM92** in the interests of effectiveness. The detailed Master Plan should be taken forward separately by the Council, either through a further iteration of the MFD or Masterplan or a SPD to support Policy EN33.

147. **MM3** and **MM65** are necessary to clarify the status of the MFD in the interests of effectiveness. Minor post-consultation amendments to **MM66** have removed the reference to the need for consistency with the MFD and any references to the figures within the MFD. Minor amendments to **MM87** have also made consequential changes to the performance indicators and targets for monitoring set out in Table 29. In addition, I have made a minor amendment to the wording of **MM66**, criterion 1 (Economic) of Policy EN33 to refer to a 'balance' between rates of new homes and jobs to better reflect the JCS. These post-consultation amendments provide further clarity and are necessary in the interests of effectiveness. They are minor and do not alter the overall aim of the policy.
148. Policies EN10 and EN11 refer to a 'bespoke' or 'separate' approach to the provision open space, playing pitches and sport and recreation facilities for the SUE. Some consideration of the type of green infrastructure and open space to be included within the SUE has taken place through the preparation of the MFD. Some key principles have been carried forward in Policy EN33, including the provision of a central green corridor; a network of green corridors and public open spaces; Strategic Accessible Natural Greenspace (SANG) provision and the provision of a new town park. Further consideration will take place through a future iteration of the MFD/SPD and through negotiations on any planning applications. Whilst inevitably on a development of this scale, there will be negotiation in terms of the scale and type of open space, sport and recreation provision the starting point for consideration should be Policy EN33 and the Open Space and Playing Pitch Strategy 2017 or subsequent updates of it.
149. **MM21**, **MM22** and **MM24** relate to policies EN10 and EN11 in which the SUE is referenced. The reasons for those MMs are set out below. Minor amendments to **MM21**, **MM22**, **MM24** and **MM66** are necessary to reinforce that the starting point for the consideration of the scale and type of open space, sport and recreation provision should be the Open Space and Playing Pitch Strategy 2017 or subsequent updates of it, for the Plan to be effective. The Council intend to prepare an Open Space SPD and a Sports and Recreation SPD which may also inform provision at the SUE depending on the timescales for their preparation. Overall, **MM3**, **MM21**, **MM24**, **MM65**, **MM66** and **MM92** are necessary in the interest of effectiveness and consistency with the JCS.
150. Representatives from Higham Ferrers and Rushden Town Councils are part of the working party which shaped the MFD. The Higham Ferrers NP (April 2016) pre-dates the adoption of the JCS (July 2016). Any conflict between the two would be resolved in favour of the most recent policy. Policy HF.H3 Higham East (Future Growth) supports comprehensive masterplanning for access and infrastructure associated with Rushden East required from the John Clarke roundabout. It also identifies that subject

to the demonstration of future need, additional land for housing, employment and community facilities would be provided within a future growth area 'Higham East' which is broadly consistent with the land identified for Rushden East within the NP area. The Rushden NP post-dates the JCS and identifies Rushden East as a suitable location for housing and to provide jobs. Consequently, Policy EN33 is broadly consistent with the RNP and also the HFNP. The projected delivery of housing on the site is considered at Issue 2 of my report.

151. **MM90** is necessary to amend the table in Appendix 1 to correctly identify Policy EN33 as a strategic policy. With the MMs identified above, I consider that the detailed boundaries for the site and Policy EN33 are positively prepared, justified, effective and consistent with national policy and the JCS.

### **EN28 Land East of the A6/Bedford Road, Rushden**

152. Following the site search and assessment process set out above, land to the east of A6/Bedford Road was identified as a viable option, scoring most highly in the ranking system. The site has opportunities to connect to the existing urban area via Bedford Road and surrounding services and facilities. In terms of deliverability, it is in single ownership; is actively being promoted by a landowner/partner housebuilder; and can be delivered independently of the Rushden East SUE.
153. Policy EN28 proposes the site for 450 dwellings together with supporting infrastructure including a mix of ancillary retail, business or community uses. The policy requires a mix of housing including 30% affordable housing, consistent with the JCS and the Framework.
154. The site is situated on the opposite side of the A6 to Rushden; however, it would have direct connectivity to the town centre via Bedford Road. Nevertheless, pedestrian and cycling connectivity to services and facilities in the town must be improved, in particular for education facilities to ensure safe and secure access across the A6 for future residents. Furthermore, there is the potential to support the creation of a community hub to enhance the relocation of sports facilities, to be located on the eastern edge of the site boundary.
155. Due to the topography, the site is relatively well contained being set at a lower level than the bund adjoining the A6 which together with dense vegetation would help to mitigate the visual impact of any development. Structural landscaping secured as part of any development scheme would further mitigate the visual impact of the development.
156. The site is situated around 3.5km from the Upper Nene Valley Gravel Pits SPA and may contain functionally linked habitat for the SPA. **MM57**, therefore, provides additional supporting text to criterion e of the Policy to ensure that appropriate surveys and other evidence, including a project specific HRA are undertaken where necessary

to ensure that any development does not have an adverse effect on the integrity of the SPA.

157. **MM58** alters the wording of the policy to refer to 'around' as opposed to 'up to' 450 dwellings to provide for some flexibility. **MM58** is also necessary to avoid repetition in bullet point 3 of criterion d. **MM57** and **MM58** are required to ensure that the allocation is justified and effective.
158. The developer is a volume housebuilder who has undertaken a number of technical studies in preparation for a planning application which was due to be submitted in 2022. No constraints have been identified which would prevent the site coming forward. First completions were anticipated 2023-2024 at an initial rate of around 30 dwellings and a rate of 50-60 dpa thereafter to the end of the Plan period. Given the preparatory work, I consider this to be realistic. Furthermore, the allocation aligns with the spatial strategy of the JCS. Consequently, with **MM57** and **MM58**, I consider the allocation to be positively prepared, justified, effective and consistent with national policy and the JCS.

#### **Policy EN36 Former Factory Site, 71 Oakley Road and 37-51 Washbrook Road, Rushden**

159. The former factory occupying the site was vacated in 2009 and the site remains derelict. Whilst there are some infrastructure requirements associated with the site, there are no constraints which would preclude its development. The allocation of the site for around 10 dwellings will aid the redevelopment of this brownfield site which would make a small contribution to the provision of a mix of housing types and tenures and provide pedestrian and cycle connections to Washbrook Road and the Greenway.
160. The site is the subject of pre-application discussions with the Council, although an application has not yet been submitted. The site has been tested through the viability appraisal considering the policy requirements. It is likely that funding may be required to bring the site forward which is reflected in the anticipated delivery of the site later in the Plan period (2028-29). **MM71** includes additional supporting text to draw attention to the need for financial contributions to mitigate the adverse effects of development on the SPA/Ramsar site. The allocation of the site for around 10 dwellings will aid the redevelopment of this brownfield site. **MM71** is required to ensure that the allocation is positively prepared, justified, effective and consistent with national policy.

#### **Policy EN37 Rectory Business Centre, Rushden**

161. The Employment Land Review (ELR) (March 2019) recommended that the site be released for an alternative use. The Rectory Business Centre and adjacent telephone exchange, warehousing and factory premises are situated adjacent to the town centre to the east of Rectory Road. The employment area has a poor and difficult road

access, and the units are in a poor state of repair and nearing the end of their economic life.

162. The site is predominantly in a residential area and would be well suited for housing development contributing around 35 units to housing land supply. Development would deliver improved access arrangements, enhancement to the public realm around Albert Road and Victoria Road and improved east-west pedestrian and cycle connectivity between the town centre and residential areas to the east.
163. Given the different ownerships on the site, and the need to relocate businesses, the Council is likely to lead the development of the site. Given these complexities, the site is likely to come forward later in the Plan period.
164. **MM72** is necessary to ensure that the effects of the development on the SPA/Ramsar site are mitigated. **MM73** is necessary to ensure that heritage assets are preserved and enhanced and to ensure that suitable access is available for the main of foul drainage infrastructure. **MM72** and **MM73** are necessary to ensure a satisfactory form of development and for the allocation to be positively prepared, justified, effective and consistent with national policy and the JCS.

#### **Policy EN38: Federal Estates/former Textile Bonding Factory site, Newton Road/Midland Road, Higham Ferrers.**

165. The site contains two large warehouses, and a factory which are in a poor state of repair, and which have been vacant for some time. The ELR concludes that the site would be better utilised for housing. Permission exists for the redevelopment of the site for around 120 dwellings including the relocation of the existing operations to a new location. The allocation would bring benefits in terms of the redevelopment of redundant brownfield land and contribute to housing land supply within Higham Ferrers. There may also be opportunities to improve pedestrian and cycle connections between the allocated housing site to the east of Ferrers School and Higham Ferrers town centre. Structural landscaping would be required to provide a suitable buffer between the site and adjacent factories.
166. Although the site is complex there is a pending full application for the site for 120 dwellings and on this basis, I agree the site could commence 2024-2025. I, therefore, consider the allocation to be positively prepared, justified, effective and consistent with national policy and the JCS.

#### **Conclusion**

167. With the MMs identified above, I consider that the housing allocations are positively prepared, justified, effective, consistent with national policy and the JCS and deliverable/developable.

## **Issue 5 – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards building a strong, competitive economy.**

168. The JCS sets out the strategy for economic development and establishes job targets as well as allocating strategic employment sites. Policy 23 identifies (Table 3) a job creation target for East Northamptonshire of 7,200 net job growth (in all sectors) within the Plan period 2011 – 2031; a net increase of 360 jobs per year. Revising the job creation target is not within the remit of this Plan. However, it is necessary to ensure that the Part 2 Plan makes sufficient provision to deliver the job creation target and spatial distribution in the JCS which directs new employment development to SUEs, strategic sites and in the case of office development, town centres and other accessible locations.
169. Table 11 of the Plan shows that it is anticipated that by 2031 the jobs target would be exceeded by around 3,382 jobs. On this basis no further strategic employment sites are allocated in the Plan and the Council's approach is to rely upon development that is already in the pipeline. Given that the JCS jobs target would be exceeded, I agree with this approach.
170. Background Paper 5 (BP5): Local Plan Employment Policies – job targets (2021) (ED F-07) explains the main sources of jobs growth over the Plan period and is divided into a jobs trajectory with five-year blocks to demonstrate how these jobs will be delivered over the Plan period. BP5 (ED F-07) also explains the sources of each of the net job figures cited; using the best available data at the time. Account is also taken of jobs anticipated to be lost.
171. The Paper utilises a number of sources for job creation figures including application forms/submission documents at the planning application stage; estimated job creation figures dependent on the 2015 Homes and Community Agency standards (now Homes England) for business, industrial or warehousing uses or apportionment of job creation by gross floorspace (m<sup>2</sup>) with reference to similar development types where job numbers are known. Whilst it can be difficult to reliably monitor job creation figures, I am satisfied that the Council has utilised the best available data sources to undertake the task.
172. BP5 (ED F-07) estimates jobs growth in excess of 6,000 jobs (6,185), over the first decade of the Plan period (to 2021) leaving a residual requirement of only 1,015 jobs required for the second half of the Plan period (2021-2031). Rushden Lakes Phases 1-4 which opened in 2017 contributed a significant proportion of these jobs (2,700 jobs).
173. A limited further number of employment sites are anticipated in the third quarter (2021-2026) with a net increase in jobs of around 742 at Chelveston Renewable Energy Park. Rushden is also anticipated to see significant delivery of further employment to 2031 at the Rushden East SUE and also at the Rushden Gateway. Around 1,382 jobs



are anticipated to come forward during the third quarter, sufficient to meet the outstanding Plan requirement of 1,015 jobs leading to a surplus of 367 jobs by 1 April 2026.

174. Significant further development (3,015 jobs) is anticipated in the fourth quarter (2026-2031) from committed strategic sites at Irthlingborough West, Tresham Garden Village, Rushden East, Rushden Gateway and Holdens Parkway in addition to the proposed brownfield land allocations, although the timescale is less clear. This would lead to a surplus of around 3,382 jobs in the Plan period.
175. As the jobs target would be met by 2026, I agree that it is not necessary to allocate any large-scale employment sites. However, the Plan does allocate smaller sites as part of proposed mixed-use, town centre regeneration schemes, which would contribute towards the job target. These sites are discussed under Issue 6 below. Consequently, I am satisfied that the Plan would meet the JCS jobs growth requirement for the Plan period and also provide sufficient flexibility and choice over the Plan period. **MM35** is necessary, however, to change paragraph 7.17 to refer to a net jobs growth target in order to be effective and consistent with paragraph 8.2 of the JCS.
176. East Northamptonshire's central location and excellent road connections has made it a centre for logistics (B8) industry including national and regional distribution centres for 'bluechip' companies. It is envisaged that logistics would be accommodated at the Rushden and Irthlingborough SUEs and on existing employment sites. Policy 24 of the JCS seeks to minimise the environmental impacts of logistics development through sensitive design and environmental performance. Given that the jobs growth target for the Plan area will be exceeded and that opportunities will exist for B8 uses on existing and proposed allocations there is no need to allocate further land for B8 use.
177. Policy EN18 sets out the approach to the consideration of development of commercial space which aligns with the aspirations of the Framework to create a strong, competitive economy and Policy 22 of the JCS which seeks to ensure the delivery of economic prosperity. The JCS provides the guiding principles for larger scale economic development and in particular logistics development. **MM37** amends the policy title to clarify that it relates to small and medium sized enterprises. **MM37** also deletes reference to 'future' development proposals and includes reference to 'medium-sized' businesses in addition to small and micro-businesses.
178. **MM36** proposes additional text to paragraph 7.34 of the supporting text to Policy EN18 to clarify the type of businesses that the policy applies to and also to ensure that the potential impacts of proposals for new commercial development on the Upper Nene Gravel Pits SPA are fully considered. **MM36** and **MM37** are required for the policy to be justified and effective.
179. Policy EN19 relates to the protection of existing employment areas. **MM38** amends the policy to clarify that proposals for re-development or changes of use of existing buildings should ensure that the overall provision of employment in terms of the net job

numbers or net employment land **on the site** is not reduced. **MM38** is also required to clarify that the policy relates to net job numbers or employment land.

180. Criterion c requires development contributions to be made to support economic development across the Plan area. However, if criterion a or b are met and it is demonstrated that there is no realistic prospect of the site or buildings being used/re-used and if the site is constrained and not suitable for employment use then it would not be necessary to require development contributions. **MM38** therefore deletes criterion c. In addition, 'and/or' needs to be inserted in between criteria a and b to be clear that not necessarily both criteria need to be met. **MM38** is necessary to ensure that the policy is effective.
181. Policy EN20 sets out the approach to the relocation and or expansion of existing businesses. The first paragraph of the policy should also include reference to businesses that need to relocate in addition to the extension of businesses to be consistent with the title. As presented, the policy contains considerable repetition for example in relation to the effect of the proposal on the countryside and neighbouring properties. Furthermore, some criteria duplicate other policies in the Plan or the JCS. **MM40** remedies this to ensure clarity and thereby effectiveness.
182. **MM39** is necessary to ensure that the supporting text reflects the need to consider the impact of the expansion or relocation of businesses on the Upper Nene Valley Gravel Pits SPA to ensure that the policy is justified, effective and consistent with national policy and the JCS.

## Conclusion

183. Overall, with the above MMs, I am satisfied that the Plan has been positively prepared and that it is justified, effective and consistent with national policy and the JCS in relation to the approach towards building a strong, competitive economy.

## **Issue 6 – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to the matter of town centres, town centre strategies and development sites?**

### **Hierarchy of Centres and Retail Provision**

184. JCS Policy 12 identifies that Rushden Lakes will be a focus for retail and leisure uses totalling no more than 32,511 square metres (sqm) net sales area (of which no more than 929 sqm for convenience goods) to enhance the retail and leisure facilities in the southern part of the Local Plan area, meeting most of the forecast additional comparison goods spending in this area. Consequently, there is no specific comparison retail floorspace requirement for the growth town of Rushden. Paragraph



5.34 indicates that there may be some scope for additional floorspace in the southern area after 2026, depending on how the Rushden Lakes scheme progresses. In the meantime, the emphasis will be on consolidating and developing a retail, leisure/culture and housing offer that allows Rushden to operate successfully alongside Rushden Lakes. The focus in market towns such as Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston will be on providing mainly convenience shopping and local services. Based on the evidence before me this is a logical approach and one which is consistent with the JCS.

## **Town Centre Boundaries and Primary Shopping Areas**

185. In line with the Framework, the Plan seeks to manage new development by defining the extent of town centre boundaries and primary shopping areas. The NPs for Higham Ferrers, Raunds and Rushden already set detailed policies for managing development within these respective towns. Rushden and Higham Ferrers NPs have identified both town centre boundaries and primary shopping areas; whilst Raunds has identified a primary shopping area. These are shown for completeness at Appendix 4 of the Plan. Consequently, the Plan logically focuses on defining town centre boundaries and primary shopping areas for Irthlingborough, Oundle and Thrapston.
186. Policy EN21 defines town centre boundaries as shown on the Policies Map and provides local policy which sets out the range of uses to be permitted in these locations. **MM41** amends the supporting text including to clarify that due to the small size of market towns, town centre boundaries effectively operate as primary shopping areas as those towns do not have areas of predominant leisure or business uses. **MM41** also clarifies that in the absence of a defined primary shopping area that 'edge of centre' for retail purposes would be within 300m from the town centre boundary to be consistent with the Framework. **MM41** is necessary to ensure consistent terminology with the Framework and to reference local regeneration strategies, master plans and design codes for town centres reflecting those that are in preparation or planned for town centres in the future. **MM41** is necessary for effectiveness and consistency with the national policy.
187. **MM42** amends Policy EN21 to refer to the centres to which the policy applies, including those within NP areas. It also clarifies that not all the criteria listed in the policy would be appropriate in all circumstances. Criterion a should refer to avoiding an over-concentration of a particular town centre use as opposed to 'use class'. I have made a minor amendment to **MM42** post-consultation to delete 'including' in criterion b as the main purpose of the criterion is to restrict residential development to first floor and above within town centres. This minor amendment is required for clarity and effectiveness and does not alter the aim of the policy.
188. Criterion d should refer to 'primary' frontages as opposed to 'shopping' frontages and include reference to their being denoted on the Policies Map. Finally, criterion g should refer to local 'regeneration' strategies as opposed to 'development' strategies. **MM42** is necessary for the policy to be effective and consistent with national policy.

189. Changes are required to the glossary to clarify that the primary shopping area is not the same as 'primary shopping frontage' by incorporating a definition for each. **MM89** addresses this matter in the interests of effectiveness and consistency with the Framework.
190. Policy EN22 sets out floorspace thresholds for retail development in Rushden town centre and the market towns. The thresholds have been set on the basis of analysis in the Retail Impact Assessments Threshold Background Paper (BP7) which concluded that lower thresholds would be appropriate in the market towns due to the sensitivity of these locations to the cumulative loss of smaller units. The slightly higher Rushden threshold of 280 sqm reflects its status as a growth town and the Sunday trading threshold. Whilst Rushden is the largest traditional town centre it is, nevertheless, vulnerable to national retail trends and must also compete with Rushden Lakes. Consequently, I consider that the thresholds are appropriate.
191. **MM43** is required to clarify the centres to which the policy applies. The policy should also refer to town centre boundaries as opposed to 'primary shopping areas' as none of the towns in question has a primary shopping area. The last sentence of the policy requires amendment to refer to 'adverse' significant impact. Reference to the need for both a sequential and impact assessment is also required. Criteria a and b require amendment to refer to Rushden and Market Town centres. The amendments set out in **MM43** are required in the interests of effectiveness and consistency with national policy.
192. **Policy EN23** relates to development around designated local centres. Some of the local centres are shown on the Policies Map as 'linear local centres' and clearly depicted, for example Rushden Linear Local Centre. Nucleated centres such as the Grangeway Precinct, Rushden are shown as a point (star) notation. In these cases, the extent of the local centres is either clear from the description (i.e. 2-12 Blackfriars) or 'on the ground' (i.e. in the case of the Grangeway Precinct). Consequently, it would be clear to the decision maker whether a proposal would be adjoining or closely related to a centre. The exact location of the Rushden East Local Centres will be decided through the masterplan/SPD.
193. As presented the policy encourages main town centre uses within 200m of the designated local centres. However, local centres tend to be small and 200m would be disproportionate to the scale of the centre. Consequently, **MM45** removes reference to 200m and refers instead to proposals which are adjoining or closely related to designated local centres. **MM45** also clarifies that proposals should be of a scale and type limited to serving the immediate local area. Furthermore, **MM45** includes reference to the local centres to which it applies. It also deletes 'presumption in favour' in the first paragraph and refers to the fact that proposals will be supported instead.
194. Criterion e cross refers to Policy EN22 and retail impact thresholds; however, the thresholds in Policy EN22 apply to Rushden and Market Towns and not local centres and so **MM45** deletes the criterion. Criterion d requires amendment to refer to the

removal of permitted development rights in exceptional circumstances to be consistent with the Guidance. **MM44** includes a consequential amendment to the supporting text after paragraph 7.76 to clarify that permitted development rights may need to be removed to ensure that local service centres maintain their role in serving the needs of the immediate neighbourhood. I have made a minor amendment to **MM44** to add that permitted development rights may be removed to protect the amenity of neighbouring occupiers. **MM44** and **MM45** remedy these matters to ensure that the policy is effective and consistent with the Framework.

## Town Centre Strategies

195. The Plan sets out overarching principles for the regeneration of the six town centres to enhance and/or maintain their vitality, an approach which is supplemented by individual town strategies. **Policy EN34** sets out the guiding principles for the consideration of development proposals in town centres. It is necessary to clarify in the supporting text at paragraph 10.10 that the policy relates to the wider town centres, not just the areas which lie within the town centre boundary and to clarify in the policy itself which centres the policy applies. **MM67** and **MM68** address these points in the interests of effectiveness.
196. Table 24 of the Plan sets out the key spatial characteristics of Rushden and Higham Ferrers. Similarly, tables 25-28 set out the spatial characteristics of Irthlingborough, Oundle, Raunds and Thrapston/Islip. The third column of the respective tables which cross reference to relevant policies in the Plan and the JCS are overly detailed and confusing and is, therefore, deleted in the respective tables. **MM69**, **MM74**, **MM79**, **MM82**, and **MM83** address these points in the interests of effectiveness.
197. The Plan sets out redevelopment proposals for key town centre sites in Rushden/Higham Ferrers and Irthlingborough. It is envisaged that these sites may be delivered either wholly by the private sector or more likely with public sector assistance. Due to the nature of the potential development, timescales for bringing forward these sites are not clear; however, allocating the sites will provide greater certainty and confidence to potential investors and act as a catalyst for development/regeneration.

## Policy EN35 Splash Pool and Wilkinson site redevelopment, Rushden

198. Policy EN35 sets out proposals to relocate the Splash Pool and Wilkinson sites which could help to consolidate the town centre, improve footfall and increase vitality and viability. It is necessary to clarify that it is identified as an area of opportunity as opposed to an allocation and also the type of uses which would be considered. New criteria are required to ensure that proposals preserve or enhance heritage assets on the site, in accordance with a heritage impact assessment and also to ensure that suitable access can be achieved for the maintenance of foul drainage infrastructure, reflecting the presence of an existing sewer. As any redevelopment would result in the loss of an existing leisure centre criterion g is strengthened to ensure that any

proposals should ensure the provision of an equivalent replacement facility. **MM70** addresses these matters for the Policy to be justified and effective.

### **Policy EN39 Former Select and Save, 13-21 High Street/St Peter's Way Car Park, Irthlingborough, Rushden**

199. Policy EN39 sets out a framework for the redevelopment of the former Select and Save and car park site in Irthlingborough for a mix of town centre uses, including convenience and comparison retailing, financial services or food and drink businesses. **MM75** is necessary to ensure that the settings of heritage assets, in particular St Peter's Church and the Louisa Lilley Almhouses, are preserved or enhanced for the policy to be justified, effective and consistent with national policy.

### **Policy EN40: Former Rushden and Diamonds FC Stadium site**

200. The former Rushden and Diamonds Football Club Stadium was demolished in 2017 and has remained vacant since. The range of potential uses is restricted by a number of constraints, in particular the location of the majority of the site within Flood Risk Zone 3. Consequently, Policy EN40 proposes to allocate the site for employment use, with an emphasis on business, leisure and tourism. **MM77** amends the policy to refer to protecting nearby heritage assets to be justified, effective and consistent with national policy.

201. **MM76** and **MM77** strengthen the supporting text and policy to ensure that development does not have an adverse effect on the integrity of the adjacent Upper Nene Valley Gravel Pits SPA/Ramsar site and associated functionally linked land, including the need for a site-specific HRA. Flood risk will also need to be carefully considered together with the impacts of climate change.

202. The supporting text requires the need to mitigate the loss of the stadium with replacement facilities; however, this requirement should be in the policy itself. Moreover, the supporting text and policy fail to recognise the need to mitigate the loss of the playing pitches and ancillary facilities in addition to the stadium, contrary to paragraph 99 of the Framework. An additional criterion is, therefore, required to ensure that mitigation secures replacement facilities, unless it can be demonstrated that the facilities are surplus to requirements. **MM76** and **MM77** remedy the above points for the policy to be justified, effective and consistent with national policy.

### **Redevelopment sites - Oundle**

203. **MM78** and **MM80** amend paragraph 10.57, 10.60 and 10.61 to ensure that the description of the Oundle built-up area is accurate; provide the most up-to-date position in relation to two potential redevelopment sites within the East Road employment area; and reflect the Town Council's aspiration to retain the East

Road/Herne Car Park as an asset for the town. Those MMs are required in the interests of effectiveness.

#### **EN41 Riverside Hotel Station Road, Oundle**

204. The former Riverside Hotel site is proposed to be allocated for a restaurant, public house, hotel; training facility/resource centre or small business units or potential service employment uses. **MM81** is necessary to ensure that the wording of criterion a relating to heritage assets is consistent with national policy.

#### **Redevelopment site - Thrapston**

#### **Policy EN42 Cattle Market, Market Road, Thrapston**

205. Policy EN42 sets out guiding principles for the redevelopment of the Cattle Market site for a mix of town centre uses. **MM85** is necessary to ensure that the wording of criterion f includes reference to non-designated heritage assets to be effective and consistent with the Framework. **MM84** alters the supporting text to the policy to identify that a HRA assessment may be required.

#### **Conclusion**

206. With the MMs identified above, I am satisfied that the Plan has been positively prepared and that it is justified, effective and consistent with national policy and the JCS in relation to the matter of town centres, town centre strategies and development sites.

#### **Issue 7 – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to the matter of social capital.**

207. Policy EN12 sets out overarching principles for the consideration of health and well-being in development proposals. **MM25** amends the supporting text to EN12 to include reference to non-motorised forms of transport, including horse riding in the movement and access section and also to recognise the implications of air quality and pollution for health and well-being. **MM25** is necessary in the interests of effectiveness.

208. **MM26** amends Policy EN12 to ensure that it fully reflects the importance of design and undertaking Health Impact Assessments at an early stage of the design process. **MM26** also moves the requirement for proposals of 10 or more homes to be accompanied by a Health Impact Assessment from the supporting text to the Policy itself. **MM26** makes further amendments to ensure that the Policy is clearly written and

unambiguous. The VA confirms that this requirement has a de-minimis cost. **MM26** addresses these matters for the Policy to be justified and effective.

209. Policy EN13 sets out criteria for the consideration of the design of buildings and extensions. **MM27** amends the Policy to clarify that amenity space should be proportionate to the scale of the unit. In addition, **MM27** amends criterion f to state that Houses in Multiple Occupation should 'have regard to' the Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Order 2018 as the Plan cannot require compliance with other legislation. **MM27** also deletes criterion h as it repeats JCS Policy 8 in relation to car parking standards and emerging Building Control Regulations in relation to Vehicle Charging Points. Criterion i is amended to clarify how the issue of light pollution would be assessed. Criterion g is amended to clarify the objective of providing sufficient internal space. I have made a minor amendment to **MM27** to ensure that the Nationally Described Space Standard is correctly referred to. **MM27** addresses all of these changes for the policy to be justified, effective and consistent with national policy.
210. Policy EN14 and Policy EN15 provide the framework for the consideration of proposals which affect designated and non-designated heritage assets respectively. **MM28-  
MM30** address a number of concerns raised by Historic England. I find the changes proposed are necessary to ensure that the wording of the policies reflect the statutory tests and national policy.
211. Table 10 of the supporting text to Policy EN15 and footnote 90, set out criteria for deciding whether a building/site/structure should be considered as a non-designated heritage asset. However, as these criteria will inform decision making, they should be included within Policy EN15 itself. **MM29 and MM30**, therefore, deletes Table 10 and makes consequential changes to paragraph 6.33 and to Policy EN15 for the Plan to be justified.
212. Policy EN16 sets out detailed criteria for the consideration of tourism, cultural developments and tourist accommodation. **MM31** includes additional supporting text at paragraph 6.49 to ensure that development proposals fully consider the effect of new development on the Upper Nene Valley Gravel Pits SPA for the policy to be justified and effective. **MM32** removes the significant degree of repetition both within the policy itself and with other policies of the Plan and the JCS. In addition, criterion b) iii relating to the use of planning conditions and legal agreements to retain development as tourist accommodation should also apply to development within the Destination Nene Valley corridor and Rockingham Forest areas. **MM32** remedies these matters for the policy to be justified, effective and consistent with national policy.
213. **MM34** deletes Policy EN17 relating to proposals for the development/allocation of a new school at land south of Chelveston Road, Higham Ferrers as the school has now been constructed. **MM33** makes consequential amendments to the supporting text. A consequential amendment is also necessary to the Policies Map. **MM33** and **MM34** are necessary for the Plan to be effective.



## Conclusion

214. With the MMs identified above, I am satisfied that the Plan has been positively prepared and that it is justified, effective and consistent with national policy and the JCS in relation to the matter of social capital.

### **Issue 8 – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to natural capital.**

215. The JCS identifies Green Infrastructure (GI) corridors of sub-regional and local importance and JCS Policy 19 provides a framework for managing development and investment and for protecting and enhancing GI. Plan policies EN7 to EN11 seek to provide a local framework for the protection, enhancement and provision of green infrastructure, open space, local green space and sport and recreation facilities respectively.

216. Across all typologies, it is not clear how developer contributions will be calculated. Clarification that the contributions will be sought in accordance with the most up-to-date evidence and where there is an identified quantitative and/or qualitative need is required for the policies to be effective. Furthermore, there is significant potential for double counting of contributions towards the various typologies in Policies EN7-EN8 and EN10-11. Additional supporting text is, therefore, included to explain that opportunities to combine open space and GI schemes should be sought to optimise design and keep contributions proportionate and that care will be taken to avoid double counting.

217. The threshold of 10 dwellings above which contributions would be secured is consistent with national policy; however, the site size threshold of 0.3ha is amended to 0.5 ha to reflect the definition of major development set out in Annex 2 of the Framework (0.5ha). In addition, the site threshold should be included in the actual policies, not the supporting text. The supporting text should confirm the commitment to the preparation of the forthcoming SPD for Open Space provision and proposed Sports and Recreation SPD which will set out a step-by-step guide for calculating requirements in the supporting text. Furthermore, clarification is needed that the preference would be for on-site provision and the approach to securing the long-term management and maintenance of new GI and open space also requires clarification.

218. The Open Space Study and Playing Pitch Strategy (2017) (ED D-08) was prepared in 2017 and the information set out in Table 9 of the Plan, the Playing Pitch Calculator, will be out of date. The table is, therefore, deleted and all the policies will refer to the most up to date evidence base and standards. I have made minor amendments to **MM17, MM19**, post-consultation, to remove reference to the SPD which has not been prepared yet in the interests of effectiveness. These minor amendments do not alter the aim or objectives of the Policy.

219. **MM16-MM19** and **MM21-MM24** remedy the above matters for Policies EN7, EN8, EN10 and EN11 to be justified, effective and consistent with national policy.
220. Policy EN7 sets out the approach to the protection and enhancement of GI Corridors in the District. **MM17** amends the title of the policy and other consequential amendments to make clear that it relates to 'local' GI Corridors for the policy to be effective.
221. It is not clear how the objectives of the policy would be achieved and furthermore, depending on the location of proposed development, it may not always be possible to connect to the GI network. Additional supporting text is, therefore, necessary which encourages developers to access the Natural England mapping tool and Policies Map to identify the GI network and to ensure that opportunities to connect to the GI network are considered early in the design process. Clarification is also required that the policy relates to the existing and proposed GI network, including local GI Corridors and the wider GI network for the policy to be effective. **MM16** and **MM17** remedy the above matters for the Policy to be justified, effective and consistent with national policy.
222. Policy EN8 seeks to ensure that development protects and enhances The Greenway, a priority GI project for the Council. Additional supporting text is included to clarify that contributions will only be sought in locations which have access to The Greenway. The policy itself is amended to reflect that it relates to both existing, proposed and aspirational Greenway routes. An additional criterion is also added to ensure that development protects heritage assets and their settings. **MM18** and **MM19** address these points for the policy to be justified, effective and consistent with national policy.
223. Policy EN9 sets out criteria for the designation of Local Green Space in NPs. The policy is amended to recognise that Local Green Space should be identified by the local community and is closely related to the settlement it is intended to serve. An additional criterion is included relating to beauty to reflect the Framework. Part c of the policy attempts to set a limit on the size of Local Green Space at 0.5ha or 10% of the existing main built-up area of the settlement. However, there is no evidence to support this size limit which goes beyond the guidance in paragraph 102 of the Framework. Part c is, therefore, amended to state that the gross area of the site should be proportionate to the existing main built-up area of the settlement and not an extensive tract of land. **MM20** remedies the above matters for the policy to be justified, effective and consistent with national policy.
224. Policy EN10 sets out the framework for the enhancement and provision of open space. Reference to the Local Football Facility Plan in the supporting text is removed as it is an investment plan and not an assessment of need. The supporting text and policy are amended to clarify that Rushden East will have its own bespoke sports and recreation facilities to be agreed in accordance with Policy EN33. I have made a minor amendment, post-consultation to **MM21** and **MM22** to clarify that open space provision at the SUE will be informed by Policy EN33 and the Open Space and Playing Pitch Strategy (or subsequent updates) and to delete reference to the MFD. These do not



alter the aim or objectives of the policy. **MM21** and **MM22** remedy the above matters so that the policy is justified, effective and consistent with national policy.

225. Policy EN11 deals with the enhancement and provision of sport and recreation facilities. It refers to new 'strategic development' which will be required to contribute to the provision of playing pitches. Footnote 73 defines strategic development as developments of 500 or more dwellings/5ha or more of employment uses. Reference is also made to 'qualifying development'; however, it is not clear what this means. Footnote 73 is, therefore, deleted and the threshold for 'major development' (10 or more dwellings/sites of 0.5ha or more) is included in the policy to be consistent with other policies in the Plan and the Framework. The supporting text and policy are amended to clarify that Rushden East will have its own bespoke sports and recreation facilities to be agreed in accordance with Policy EN33. I have made a minor amendment to **MM24** to clarify that sports and recreation provision at the SUE will be informed by Policy EN33 and the Open Space and Playing Pitch Strategy (or subsequent updates) and to delete reference to the MFD in the policy itself.

226. The cross reference to Table 7 is removed as this does not include sport and recreational facilities. **MM23** and **MM24** address the above matters for the Policy to be effective and consistent with national policy.

## Conclusion

227. With the above MMs, I am satisfied the Plan has been positively prepared and that it is justified, effective and consistent with national policy and the JCS in relation to natural capital.

## Issue 9 – Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to viability.

228. A Local Plan VA was submitted alongside the Plan. It has been subject to consultation at various stages and the points raised were addressed and considered in the report. Developers question some of the inputs to the assessment; however, undertaking a VA is not an exact science and there will always be an element of judgement in applying assumptions and reaching conclusion. From everything which I have read, and the evidence considered at the hearing sessions, I find the methodology consistent with the Guidance and the inputs applied grounded in recognised data sources.

229. The VA does not assess each housing site individually but identifies a number of typologies based on location, greenfield/brownfield, size of site and current and proposed use/type of development in line with advice in the Guidance. The viability of sites varies considerably depending on whether a site is greenfield or brownfield and also the location. Viability is best in the rural north and Oundle but lower in the urban areas in the south. Nevertheless, paragraph 7.3 of the VA confirms that the appraisals

have considered the cumulative impact of other plan policies, such as the JCS and that the proposed Plan (part 2) policy obligations would have a marginal cumulative impact on viability. Moreover, JCS Policy 30 and Plan policies have sought to provide a degree of flexibility to take viability into account for example, **MM62** amends Policy EN31 to incorporate a viability clause.

230. Furthermore, in terms of open space provision, the VA appraisals incorporate sufficient undeveloped space through a net to gross ratio site area adjustment of 60-65% on larger sites to facilitate provision of open space. The appraisals also incorporated a package of Section 106 obligation contributions.

231. Overall, taking account of the conclusions of the VA and the flexibility provided by Plan policies, I consider that the cumulative requirements of the JCS and the Plan would not undermine the delivery of the strategy of the Plan by threatening the viability of development. Consequently, the plan would be consistent with paragraph 34 of the NPPF and paragraphs 001-006 and 029 of the Guidance.

### **Conclusion**

232. Subject to the MMs set out above, the Plan is positively prepared, justified, effective and consistent with national policy in relation to viability.

### **Issue 10 – Whether effective arrangements are in place for the monitoring of the Plan.**

233. Chapter 11 of the Plan sets out the monitoring and implementation arrangements for the Plan. Paragraph 11.4, which sets out the various localised infrastructure priorities, requires amendments to: incorporate updates; make reference to the local education authority/national policies and; make reference to fire and rescue services. **MM86** addresses this matter in order for the Plan to be effective.

234. Table 29 sets out detailed performance indicators and targets for monitoring. **MM87** sets out changes to the objectives, indicators, aims and targets in Table 29 to ensure that there would be clear and effective mechanisms to monitor the implementation of the Plan. **MM87** is, therefore, required for effectiveness.

### **Conclusion**

235. Subject to **MM86** and **MM87**, I consider that there are effective arrangements in place for the monitoring of the Plan.

## Overall Conclusion and Recommendation

236. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

237. The Council has requested that I recommend MMs to make the Plan sound and legally compliant and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended MMs set out in the Appendix the East Northamptonshire Local Plan Part 2 2011-2031 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

*CA Mulloy*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

This page is intentionally left blank

# Schedule of Proposed Main Modifications to the Submission Local Plan

## Part 2 Local Plan

March 2023

## Introduction

The schedule includes:

- The reference number for the main modification with the prefix 'MM'
- A cross reference to the section/ paragraph/ policy number/ figure or table to which the modification applies
- A cross reference to the relevant page number/s to which the modification applies
- Details of the proposed modification
- A reason as to why the modification is necessary

The following format has been used to denote the proposed main modifications:

- **Bold underlined** – new text proposed
- ~~Strikethrough~~ – text proposed for deletion

A separate schedule of proposed changes relating to minor modifications and the Policies Map have been prepared to illustrate the proposed changes arising from the modifications.

Representations will be invited on all the proposed modifications, including proposed changes to the Policies Map, but not on any other aspect of the plan.

## Schedule of proposed Main Modifications – March 2023

| Ref No. | Para/ Policy/ Figure/Table/Map ref | Publication Plan Page | Proposed Change | Reason for Change |
|---------|------------------------------------|-----------------------|-----------------|-------------------|
|---------|------------------------------------|-----------------------|-----------------|-------------------|

### Introduction

|     |                    |    |   |  |
|-----|--------------------|----|---|--|
| MM1 | Para 1.23          | 18 | <p><i>Amend text to paragraph 1.23 as follows:</i></p> <p>Add the word <b>bodies</b> to second sentence after the words “specific consultation”<br/>                     Reword the third sentence to add the words <b>to inform any potential</b> before the wording “cross boundary issues”.</p>  | <p>For greater clarity</p> <p>(Action Point 1)</p>                     |
| MM2 | Para 1.46 and 1.47 | 23 | <p><i>Amend paragraphs 1.46 and 1.47 as follows:</i></p> <p>1.46 <b>Areas of land located beyond t</b><del>The Upper Nene Valley Gravel Pits SPA/ Ramsar site</del> <b>may also be important ecologically in supporting populations for which the SPA has been designated, these areas are defined as</b> <del>is also adjoined by Functionally Linked Land (FLL)<sup>22</sup>. FLL is adjacent or nearby land that lies outside the statutory designated SPA/ Ramsar area, but which in practical terms should be treated as if it forms an integral part of the SPA/ Ramsar site. For example, in the case of the Upper Nene Valley Gravel Pits SPA,</del><br/>                     Natural England has advised that land beyond designated SPA/ Ramsar sites may provide foraging habitats for protected wintering bird species such as lapwing and golden plover. <b>FLL has been considered through the HRA undertaken to support the Plan.</b></p> <p><b><u>Policy 4 of the JCS and the Special Protection Area SPD set out requirements where development would have an effect on the SPA to ensure that such development would have no significant effect on the SPA. The Special Protection Area SPD includes a Mitigation Strategy. The JCS Policies Map identifies two zones, one within a 3km buffer of the SPA and one within a 4km buffer of the SPA. Within the 3km buffer zone the SPA a Mitigation Strategy applies. For larger greenfield developments of 2ha or more, the Joint Core Strategy (paragraph 3.41) requires that within the 4km buffer these should be subject to site specific wintering bird surveys to determine if sites have a role as functionally linked land. The effectiveness and extent of the SPA buffer zones will need</u></b></p> | <p>To address comments from Natural England (Reps 48/13 and 48/16)</p> |

## Schedule of proposed Main Modifications – March 2023

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <p><b><u>to be addressed through a review of the JCS, to ensure that a sustainable approach to future development proposals is agreed.</u></b></p> <p>The SPA/ Ramsar site is also protected by 3 and 4km buffer zones shown on the adopted Policies Map, within which the SPA Mitigation Strategy<sup>23</sup> applies. Policy 4 of the Joint Core Strategy and the Special Protection Area supplementary planning document, incorporating the Mitigation Strategy (November 2016)<sup>24</sup> require that prescribed development types within the 3 and 4km buffer zones of the SPA/ Ramsar site (defined as FLL) will need to make financial contributions to mitigate the impacts of these developments.</p> <p><i>Add new paragraph as follows:</i></p> <p><b><u>Natural England has raised concerns regarding the impacts of air quality and pollution upon the SPA/ Ramsar site. The local planning authority shares these concerns and since July 2020 the Council has required air quality assessments submitted in support of planning applications/ proposals, which are to be prepared in line with the East Midlands Air Quality Network (EMAQN) guidance<sup>1</sup>.</u></b></p> |  |
|--|--|--|---|--|

### Area Portrait

|     |                     |    |  |                |
|-----|---------------------|----|--|----------------|
| MM3 | Paras 2.10 and 2.11 | 29 | <p><i>Amend paragraphs 2.10 and 2.11 as follows:</i></p> <p>Development of the Rushden East sustainable urban extension has been a commitment since adoption of the Joint Core Strategy in July 2016 (Policy 33). This is a new proposal including at least 2,500 dwellings and associated jobs and facilities, reflecting the status of Rushden as a Growth Town. Policy 33 identifies the broad location for this SUE, together with the key issues and development principles that need to be addressed as this is taken forward through master-planning. <del>The masterplan will define the development boundaries and policy expectations for the SUE.</del></p> | Factual Update |
|-----|---------------------|----|--|----------------|

<sup>1</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11094/emaqn\\_aq\\_and\\_planning\\_developer\\_guide\\_-\\_july\\_2018](https://www.east-northamptonshire.gov.uk/downloads/file/11094/emaqn_aq_and_planning_developer_guide_-_july_2018)



## Schedule of proposed Main Modifications – March 2023

|  |  |  |  |  |
|--|--|--|--|--|
|  |  |  | An overarching vision for Rushden East was agreed by the Council on 17 July 2017 <sup>2</sup> . Following on from this, the Council prepared the draft Rushden East Masterplan Framework Document (MFD) <sup>3</sup> . This was published in January 2020, for consultation during February – March 2020. Following this consultation, it was determined that the MFD should be incorporated into the Local Plan Part 2 (Planning Policy Committee, 21 September 2020, Item 5). <b><u>Following the examination of the Plan it was agreed that the MFD would be taken forward as a Supplementary Planning Document supporting Policy EN33.</u></b> |  |
|  |  |  |  |  |

### Spatial Development Strategy

|     |            |    |   |   |
|-----|------------|----|---|---|
| MM4 | Para 4.14  | 51 | <p><i>Amend paragraph 4.14 as follows:</i></p> <p>The eight largest freestanding villages within the district are significantly larger than other villages located in East Northamptonshire. These are identified as large villages; each having a substantive range of services and facilities. In many cases these serve a wider local cluster or network of rural settlements and may have the capacity to accommodate additional local growth, where, <b><u>for example</u></b>, promoted through neighbourhood planning.</p> | To reflect changes to the spatial policies. |
| MM5 | Para 4.29  | 56 | <p><i>Amend paragraph 4.29 to reflect changes proposed to Policy EN1 as follows:</i></p> <p>Policy <b><u>Policies EN1 and EN2</u></b> (below) explains how the spatial development strategy should apply. <b><u>The policies</u></b> ‡ provides additional district-level direction to support the development management process or provides further strategic direction for the preparation of neighbourhood plans.</p>   | To reflect changes to the spatial policies. |
| MM6 | Policy EN1 | 56 | <i>Amend Policy EN1-as follows:</i>   |   |

<sup>2</sup> [https://www.east-northamptonshire.gov.uk/info/200153/planning\\_and\\_buildings/1881/rushden\\_sustainable\\_urban\\_extension](https://www.east-northamptonshire.gov.uk/info/200153/planning_and_buildings/1881/rushden_sustainable_urban_extension)

<sup>3</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11671/draft\\_masterplan\\_framework\\_document\\_-\\_january\\_2020](https://www.east-northamptonshire.gov.uk/downloads/file/11671/draft_masterplan_framework_document_-_january_2020)

Schedule of proposed Main Modifications – March 2023

|  |  |  |   |
|--|--|--|---|
|  |  | <p><del>Future d</del> Development proposals will respect the network of settlements across the district, in accordance with the spatial roles set out in the Joint Core Strategy (Table 1) <b><u>along with local considerations for assessing development proposals set out below and through Policy EN2 and the supporting text.</u></b> and Table 4 above. The mixed rural/urban character of East Northamptonshire will be recognised, with growth directed in accordance with the urban focussed spatial strategy.</p> <p><b><u>Settlements within the Plan area vary greatly in character, function and role. To provide greater clarity as to how the Spatial Strategy will be applied within East Northamptonshire, informed through Tables 4 and 5 of this Plan, the following approach will set out a context for development proposals:</u></b></p> <p>1. Urban Areas</p> <p>a) <del>Rushden and Higham Ferrers</del> – Rushden will be the focus for major development, as the designated Growth Town, concentrated upon the delivery of the Rushden East Sustainable Urban Extension and land to the east of the A6/Bedford Road (<b><u>Policy EN28</u></b>). <del>Development at Higham Ferrers will take place within the current built up area of the town, with additional locally arising development needs directed towards Rushden.</del></p> <p>b) <del>Irthlingborough, Raunds and Thrapston</del> – <b><u>Higham Ferrers, Irthlingborough, Raunds, Thrapston and Oundle</u></b> Development will be focussed upon the major committed development sites at Irthlingborough (including Crow Hill), Raunds, and Thrapston. Development at Higham Ferrers will take place within the current built up area of the town with additional locally arising development needs directed towards Rushden. <b><u>Development at Higham Ferrers will take place within the current built up area of the town with additional locally arising development needs directed towards Rushden.</u></b> Further development at these towns will focus upon urban re-imagination, to support job creation, regeneration and to secure and enhance the local service base.</p> <p>c) <del>Oundle</del> – <b><u>At Oundle, D</u></b> <del>development will be directed towards delivering the outstanding allocations. Further development proposals,</del> <b><u>proposals will seek to deliver the allocated sites</u></b> to meet the Joint Core Strategy requirements for the latter half of the Plan period (2021-2031), <del>will come forward in order to enhance Oundle’s role as the main service centre for the rural north of the District, as set out in the housing delivery section of the Plan.</del></p> | <p>Hearings outcome<br/>Action Point 12</p> <p>Hearings outcome<br/>Action Points 13,14, 15</p> <p>To address comments from Francis Jackson</p> |
|--|--|--|---|

Schedule of proposed Main Modifications – March 2023

|  |  |   |                   |
|--|--|---|-------------------|
|  |  | <p>2. Freestanding Villages</p> <p>a) To support <b>help maintain</b> and strengthen local services at the eight larger villages (Table 4), <del>small scale infill and windfall development</del> infill development opportunities within the existing built up areas (footnote 50 deleted) <del>will be supported</del>, as defined through Policy EN2 and the supporting text, or a made Neighbourhood Plan, will be supported. ‘Rural exceptions’ affordable housing schemes (Policy EN5) or other small-scale employment and community-based proposals will also be supported. <del>Further development of an appropriate scale will be supported, where it can be demonstrated that this is necessary to fulfil a defined local need</del><br/> <b>Further D</b>development beyond the extent of the built-up area will be resisted, unless promoted <b>allocated</b> through a Neighbourhood Plan.</p> <p>b) <del>Development opportunities at the small (other freestanding) villages (Table 5), will be limited to small scale infill and windfall development within the existing built up areas, “rural exceptions” affordable housing schemes or other small scale employment or community focused proposals.</del></p> <p><b><u>Within the eight larger freestanding villages (Table 4) larger scale <sup>4</sup>development opportunities may be supported where it can be demonstrated that they are necessary to fulfil a defined local need- <sup>5</sup>and meet the requirements of Policy EN2, together with the supporting text, as being considered as part of the built-up area, or a made Neighbourhood Plan.</u></b></p> <p>3. Open countryside and restraint villages</p> <p>a) <del>There is a general presumption against new build residential development units in isolated locations away from defined villages, as shown in Table 5, although proposals for rural</del></p> | Homes (Rep 21/01) |
|--|--|---|-------------------|

**<sup>4</sup> Larger scale development proposals will need to take into account the guidance set out in Table 18 (Indicative rural housing need) of the Local Plan, as well as taking into account any development that has already been provided in a settlement within the plan period.**

<sup>5</sup> Locally defined needs (**as referred to in the larger freestanding villages section of the Plan above**) are generally defined through mechanisms such as housing needs surveys or community plans. These sites may be delivered by way of Rural Exceptions housing, Neighbourhood Plan proposals or rural diversification schemes.

Schedule of proposed Main Modifications – March 2023

|     |           |    |  |   |
|-----|-----------|----|--|---|
|     |           |    | <p><del>diversification or the appropriate</del> <b>Development will be refused for new build residential development units in locations beyond the built-up area of the settlements identified in Table 5. Development proposals for rural diversification or the</b> re-use or conversion of rural buildings will be supported <b>where this in accordance with Policy 11 of the Joint Core Strategy.</b></p> <p>b) The four restraint villages (Armston, Ashton, Wakerley and Wigsthorpe) together with other rural outliers, are defined as open countryside. Rural diversification or the <del>appropriate</del> re-use or conversion of rural buildings will be supported <b>where this in accordance with Policy 13 Section 2 of the Joint Core Strategy the relevant policy guidance.</b></p>  |   |
| MM7 | Para 4.31 | 58 | <p><i>Amend the sub heading to this section of text at para 4.31</i></p> <p><del>Settlement boundaries – differentiating between built up areas and the countryside</del><br/><b>Defining Built-up areas</b></p>   | To reflect changes to the spatial policies. |
| MM8 | Para 4.35 | 59 | <p><i>Amend paragraph 4.35 as follows:</i></p> <p>These criteria could equally be applied for the urban areas. The default position for this Plan is that infill development will be generally supported within the urban areas. The <del>development principles settlement boundary criteria in</del> <b>together with the supporting text to</b> Policy EN2 provide more detailed criteria to support those in the Joint Core Strategy</p> <p><i>Add the following as new supporting text after para 4.35</i></p> <p><b><u>The spatial development strategy (Table 2) sets out the settlement roles for the Plan area. The size of settlements ranges from the Growth Town of Rushden, as the largest settlement, down to the smaller rural settlements of defined villages such as Pilton and Newton Bromswold.</u></b></p> <p><b><u>The spatial approach for the rural areas is further explained in section 4 and Policy EN1 above, with a list of the freestanding villages set out in Table 5. The smallest freestanding villages accommodate upwards of 20 dwellings and a built-up area is therefore defined by those settlements that comprises a cluster of 20 or more residential buildings and are identified in Table 5.</u></b></p> | To reflect changes to the spatial policies. |

Schedule of proposed Main Modifications – March 2023

|     |            |    |  |   |
|-----|------------|----|--|---|
|     |            |    | <p><b><u>The definition of that built-up area is considered to include areas that have a closer relationship, in character and scale, to that cluster of buildings defining a settlement, than that of the surrounding countryside, as set out in the Joint Core Strategy paragraph 5.17. This includes areas of land committed for development by way of an extant planning permission or development plan allocation adjoining the built-up area.</u></b></p> <p><b><u>The extent of the built-up area excludes the following uses, unless they are wholly enclosed on all sides by built development forming part of the built up area:</u></b></p> <p><b><u>a) existing employment use, caravan sites, cemeteries, churchyards and leisure use including sport and recreation</u></b></p> <p><b><u>b) freestanding built structures, including farmyards and associated agriculture buildings</u></b></p> <p><b><u>c) open spaces and allotments</u></b></p> <p><b><u>d) isolated properties or areas of ribbon development which are physically and visually detached from the main built form.</u></b></p>   |   |
| MM9 | Policy EN2 | 59 | <p><i>Policy EN2 is deleted in its entirety and replaced with the following policy:</i></p> <p><del>Policy EN2 Settlement boundary criteria –urban areas</del></p> <p><del>Whilst it is recognised that some made Neighbourhood Plans contain settlement boundaries, infill development will generally be supported in the urban areas, as defined by Policy EN1 (1), where it meets the following criteria:</del></p> <p><del>a) Small in scale, relative to an otherwise built up frontage;</del></p> <p><del>b) Well related to the urban area (existing or committed);</del></p> <p><del>c) Clearly distinct from the countryside physically and visually;</del></p> <p><del>d) Bounded by compatible development (existing or committed);</del></p> <p><del>e) For land on the periphery of towns, bounded by compatible existing or committed development on at least two sides, which should be adjoined by a road (or other strong and distinct physical feature);</del></p> <p><del>f) Unlikely to be of any beneficial use as open land, including for agriculture, or;</del></p> <p><del>g) Committed for development by way of an extant planning permission or development plan allocation.</del></p> | To reflect changes to the spatial policies. |

Schedule of proposed Main Modifications – March 2023

|      |                    |    |   |   |
|------|--------------------|----|---|---|
|      |                    |    | <p><b><u>Policy EN2 Development Principles</u></b></p> <p><b><u>Development proposals will be generally supported where they meet the following requirements/criteria:</u></b></p> <p><b><u>(i) The site is allocated in the Local Plan or a made Neighbourhood Plan;</u></b></p> <p><b><u>(ii) Infill development within a built-up area (as defined in supporting text) or within a settlement boundary, where that is defined by a neighbourhood plan, will be supported where the site is:</u></b></p> <p><b><u>(a) well-related to the principal built-form of the settlement (existing or committed) and is not protected for any other use;</u></b></p> <p><b><u>(b) clearly distinct from the surrounding countryside, both physically and visually;</u></b></p> <p><b><u>(c) bounded by existing or committed development on at least two sides, which should be adjoined by a highway and such that developing it would not extend the built form away from a highway to create a “backland” form of development</u></b></p> <p><b><u>(iii) They would not harm the settlement’s character, form, or the surrounding countryside, including the need to avoid comprising key views, heritage assets and their settings, respect the importance of open, greenspace areas within the built up form of the settlement and seek to conserve special landscape designations; and</u></b></p> <p><b><u>(iv) They would not be disproportionate to the settlement's size, form and range of facilities available.</u></b></p> |   |
| MM10 | Para 4.39 and 4.40 | 60 | <p><i>Amend paragraph 4.39 as follows:</i></p> <p>At the freestanding villages, new residential infill development should occur within the existing built up areas, as defined by the <del>Policy EN3 criteria (below)</del> <b><u>EN2 and the supporting text.</u></b></p>   | To reflect changes to the spatial policies. |

Schedule of proposed Main Modifications – March 2023

|      |                 |       |  |   |
|------|-----------------|-------|--|---|
|      |                 |       | <p>These criteria should be applied in managing <del>small scale and/or residential infilling at the periphery of villages.</del> <b>future development proposals.</b> They may also be utilised for neighbourhood plans, where it has been decided to designate settlement boundaries, as is the case for the made Brigstock, Chelveston cum Caldecott, Glapthorn, King's Cliffe, Stanwick and Warmington neighbourhood plans.</p> <p><i>Delete paragraph 4.40 in its entirety:</i></p> <p>The settlement boundaries for the built up area(s) of designated freestanding villages do not necessarily need to be contiguous. These may consist of two or more separate elements. Small scale infill new-build development will be expected to take place within the defined settlement boundaries. These are defined by Policy EN3 (below) or (if designated through a neighbourhood plan) shown on the Policies Map.</p>  |   |
| MM11 | Policy EN3      | 60-61 | <p><i>Delete Policy EN3 in its entirety:</i></p> <p><del>Policy EN3 Settlement boundary criteria- freestanding villages (Table5)</del></p> <p>Small scale residential infill development will be supported within freestanding villages. The extent of the built up areas of these villages is defined by the following principles:</p> <ul style="list-style-type: none"> <li>a) <del>existing employment use, caravan sites, or leisure use on the edge of villages which are clearly detached from the main built up area are <u>excluded</u>:</del></li> <li>b) <del>freestanding, individual or small groups of dwellings, nearby farm buildings or other structures which are clearly detached from the main built up area are <u>excluded</u>:</del></li> <li>c) <del>public open spaces on the edge of villages are <u>excluded</u>:</del></li> <li>d) <del>residential curtilages, where these are bounded by existing built curtilages on fewer than two sides, are <u>excluded</u>: and</del></li> <li>e) <del>areas of land committed for development by way of an extant planning permission or development plan allocation adjoining the built up area are <u>included</u>.</del></li> </ul> | To reflect changes to the spatial policies. |
| MM12 | Paras 4.41-4.43 | 61    | <p><i>Delete paragraphs 4.41-4.43 in their entirety</i></p> <p><del>4.41 The Avenue Road/ Bedford Road/ Newton Road area of Rushden (population approximately 600) represents the most significant area of ribbon development. This lies to the south east of the main Rushden urban area and has a predominantly suburban character</del></p>   | To reflect changes to the spatial policies. |

Schedule of proposed Main Modifications – March 2023

|      |            |    |  |   |
|------|------------|----|--|---|
|      |            |    | <p><del>but is physically detached from the main urban area (lying beyond the A6 Bypass). Its status was set through the Neighbourhood Plan, which defined the area as a part of Rushden’s rural hinterland. Policy H1 in the Neighbourhood Plan specifies the relevant development management criteria for this part of Rushden.</del></p> <p><del>4.42 The rural hinterlands of Irthlingborough and Raunds also include areas of ribbon development which are similarly physically detached from the main urban area. Accordingly, two such areas are:</del></p> <ul style="list-style-type: none"> <li><del>• Lower Crow Hill (Addington Road, Irthlingborough); and</del></li> <li><del>• Brooks Road, Raunds.</del></li> </ul> <p><del>4.43 In many regards the settlement boundary criteria for the smaller villages may not be appropriate in the case of the outlying ribbon developments. Indeed, these have a specific character and built form that differentiates them from the freestanding small villages, although it must be recognised that these have a linear built form which lends itself to accommodating appropriate windfall development. Accordingly, Policy EN4 (below) explains the circumstances where residential infill development would be appropriate in the case of the lower Crow Hill and Brooks Road ribbon developments.</del></p> |   |
| MM13 | Policy EN4 | 61 | <p><del>Delete Policy EN4 in its entirety:</del></p> <p><del>Policy EN4 Settlement boundary criteria-ribbon developments</del><br/> <del>Within the ribbon development areas of lower Crow Hill (Irthlingborough) and Brook Road (Raunds), as shown by a linear designation on the Policies Map, development will be supported provided that it;</del></p> <ul style="list-style-type: none"> <li><del>a) is bounded by existing built curtilages on at least two sides;</del></li> <li><del>b) has a frontage to the highway and a depth similar to adjoining residential curtilages</del></li> <li><del>c) does not extend the built form away from the main highway to create a “backland” form of development; and</del></li> <li><del>d) has regard to positive local character and distinctiveness.</del></li> </ul>   | To reflect changes to the spatial policies. |
| MM14 | Policy EN5 | 63 | <p><del>Amend Policy EN5 title and policy as follows:</del></p>  | To reflect changes to the                   |



## Schedule of proposed Main Modifications – March 2023

|      |            |    |   |   |
|------|------------|----|---|---|
|      |            |    | <p>Policy EN5 Development on the periphery of settlements <del>with a defined settlement boundary</del> and rural exceptions housing.</p> <p>Beyond the <u>extent of the built up area</u> <del>defined settlement boundaries</del>, as defined <u>in the supporting text to</u> <del>by policies</del> <b>Policy EN2—EN4</b> (or defined, <u>by a settlement boundary</u>, within a made Neighbourhood Plan), new build residential development will not generally be supported. However, <b>proposals for</b> rural diversification, the re-use or conversion of rural buildings, or rural exceptions housing schemes will be supported<sup>6</sup>. <del>where it fulfils the relevant development plan policies.</del></p> <p>In recognition of the rural nature of the district the following criteria will apply when <del>taking into account</del> <b>assessing</b> the suitability of settlements to provide for rural exceptions <b>housing on the periphery of settlements:</b></p> <ul style="list-style-type: none"> <li>a) the proposed development <del>will encourage the promotion of</del> <b>would assist in supporting</b> services in the settlement <del>or assist in supporting services which are provided in neighbouring settlements, and</del> <b>or in a cluster of nearby settlements</b><sup>7</sup></li> <li>b) proposals will need to take into account the policy requirements set out in Policy 13 of the Joint Core Strategy, balanced against the need to assist in meeting a locally identified need for affordable housing provision and a desire for people to continue to live in their local community <del>even though services may be restricted</del> <b>evidenced by a local needs housing survey</b></li> </ul> | spatial policies.                           |
| MM15 | Policy EN6 | 64 | <p><i>Amend Policy EN6 as follows:</i></p> <p>Proposals for new build replacement dwellings in the countryside will be granted where they meet the following criteria:</p> <ul style="list-style-type: none"> <li>a) The original dwelling has not been abandoned or allowed to fall</li> </ul>   | To reflect changes to the spatial policies. |

<sup>6</sup> Relevant policies for rural exceptions housing or economic development are Joint Core Strategy policies 13 and 25, and/or equivalent policies in a Neighbourhood Plan.

<sup>7</sup> This would avoid the situation where, for example, a specialist housing scheme for older people may be turned down in a village if there are no services there for older people. ~~If the properties are provided, then the services are likely to follow.~~ **but which are provided nearby.**

Schedule of proposed Main Modifications – March 2023

|  |  |  |   |   |
|--|--|--|---|---|
|  |  |  | <p>into a state of dereliction and disrepair, so that any replacement would in effect be treated as a ‘new dwelling’ (a structural survey will be required where any signs of dereliction or disrepair is <del>seen</del> <b>visible</b>, or the building has been unoccupied for some time);</p> <p>b) The original dwelling is not a temporary or mobile structure;</p> <p>c) The replacement dwelling is located within the site boundary of the original dwelling;</p> <p>d) The replacement is of a size, scale and massing similar to the original dwelling, and the footprint and floor space should be a similar amount to the original dwelling;</p> <p>e) Where an existing dwelling is considered too small for modern living standards (<b><u>to be assessed having regard to the latest applicable national space standards</u></b>), the floor space may be increased <b><u>to meet nationally described space standards</u></b>, however this should not be to the detriment of the open countryside or character of the area; and</p> <p>f) The design, materials and layout of the replacement dwelling should be sympathetic to the surrounding area by preserving and/ or enhancing the immediate setting and <del>the wider character area</del>, <b><u>taking into account any wider impact of the development in its general location.</u></b></p> <p>Conditions or unilateral undertakings <b><u>will</u></b> <del>should</del> be used to ensure the demolition and removal of the existing dwelling is undertaken prior to the first occupation of the new dwelling or prior to construction of the new dwelling where more appropriate.</p> | <p>(e)Hearings<br/>Action Point 22</p> <p>(f)Hearings<br/>Action Point 23</p> <p>Hearings<br/>Action Point 24</p> |
|--|--|--|---|---|

Natural Capital

|      |  |         |   |  |
|------|--|---------|---|--|
| MM16 | Supporting text to Policy EN7 Para 5.12 & Figure 7 | 68 - 70 | <p><i>Amend second sentence of paragraph 5.12 as follows:</i></p> <p>As this requirement may affect the viability of smaller developments a threshold of 10 or more dwellings; 0.5<del>3</del> ha or more for housing schemes; or more than 1000m<sup>2</sup> for commercial schemes, is set (Policy EN7, below) to enable developer contributions towards the local GI and Greenway.</p> | Hearing Action Points 142, 146, 147, 150 |
|------|--|---------|---|--|

|  |  |   |  |
|--|--|---|--|
|  |  | <p><i>Add two new paragraphs after paragraph 5.12 as follows:</i></p> <p><b><u>There are many ways that development can link in with the existing GI network. In addition to the GI corridors shown on the Policies Map there are maps available which identify the wider GI network in a location, for example the GI standards suite prepared by Natural England has a mapping tool where all GI can be seen. Developments should consider early in the design process where the local GI is located and how the development can link to it, both for people and wildlife benefit. There are various policies and guidance available on how good design can facilitate this.</u></b></p> <p><b><u>When determining contributions towards GI, consideration needs be given to the relationship between Policy EN7 and EN8. Contributions should reflect the scale and location of the site under consideration and should be proportionate. The relationship with Policy EN7, EN8 and EN10 also need to be considered. GI and Open Space are clearly related with open spaces forming an integral part of the GI network. Opportunities to combine open space and green infrastructure schemes should be sought to optimise design and keep contributions proportionate. The Council will take care to avoid double counting between strategic and local green infrastructure and open space requirements when calculating contributions. A Supplementary Planning Document for Open Space and GI provision will be prepared to set out a step by step guide for calculating requirements.</u></b></p> <p><i>Amend the Figure 7: Priority Green Infrastructure Corridors Legend as follows:</i></p> <p><b><u>New</u></b>Suggested-Local GI Corridors</p> <p><i>Amend final sentence of paragraph 5.14 as follows</i></p> <p>The longer term management and maintenance of new public open spaces or other Green Infrastructure will be achieved through mechanisms such as a management company or a maintenance fund managed by the relevant Town or Parish Council for the lifetime of the development. <b><u>In order to secure the long term management and maintenance of new public open spaces or other Green Infrastructure developers should work with the council to determine the most appropriate long term management and maintenance arrangements.</u></b></p> |  |
|--|--|---|--|

Schedule of proposed Main Modifications – March 2023

|      |            |    |   |   |
|------|------------|----|---|---|
| MM17 | Policy EN7 | 70 | <p><i>Amend EN7 Policy title as follows:</i></p> <p>Policy EN7: <b>Local</b> Green Infrastructure corridors</p> <p><i>Amend Policy EN7 as follows:</i></p> <p><b>Local</b> Green Infrastructure corridors are identified on the Policies Map <b>and Figure 7</b>. These <b>local</b> corridors will be protected and enhanced by <b><u>through development proposals</u></b>. <b><u>Development proposals will be expected to:</u></b></p> <ul style="list-style-type: none"> <li>a) Ensuring that, <b><u>where opportunities exist</u></b>, new development, including open space, is connected to the <b>Local</b> Green Infrastructure network, <b><u>this includes the local GI corridors and the wider Green Infrastructure network</u></b>;</li> <li>b) Ensuring, <b><u>through the design and layout of schemes</u></b>, the delivery of ecosystem services, through measures such as green roofs and walls, the protection of soils, plus new tree planting, including planting of new street trees, using native species;</li> <li>c) Using developer contributions, and additional funding streams, where possible, to facilitate appropriate additions to, or improve the quality of, the <b><u>existing and proposed</u></b> Green Infrastructure network; and</li> <li>d) <b><u>Requiring sites of 10 dwellings or more (or 0.5ha or more) and commercial sites of 1000m<sup>2</sup> or more to make on-site provision and/ or providing off-site contributions, to create connections to the defined Green Infrastructure corridors in accordance with the most up to date standards/standards in the SPD;</u></b></li> </ul> <p>Opportunities to create the following <b>local</b> Green Infrastructure corridors and incorporate them into the wider Green Infrastructure network will be supported:</p> <ul style="list-style-type: none"> <li>i) Duddington – Gretton (via Wakerley Woods)</li> <li>ii) King’s Cliffe – Wansford</li> <li>iii) Blatherwycke – Fotheringhay</li> <li>iv) Brigstock – Fotheringhay (via Glapthorn Cow Pasture and Lower Benefield)</li> </ul> | <p>Hearings Action Point<br/>141, 142, 143,<br/>144, 145, 146</p> |
|------|------------|----|---|---|

Schedule of proposed Main Modifications – March 2023

|      |  |       |   |   |
|------|--|-------|---|---|
|      |  |       | <p>v) Brigstock Country Park – Oundle</p> <p>vi) Oundle – Great Gidding (via Ashton Wold)</p> <p>vii) Aldwincle – Twywell (via Drayton House)</p> <p>viii) Oundle circular cycle/ pedestrian network</p>  |   |
| MM18 | Supporting text to Policy EN8 Paras 5.15 – 5.17 & Figure 8 | 71-73 | <p><i>Amend paragraph 5.15 second sentence as follows:</i></p> <p>It will provide an alternative means of transport, predominantly for walkers and, cyclists <b>and equestrian users where appropriate</b> and <b>to</b> provide opportunities for informal recreation.</p> <p><i>Add new paragraph after paragraph 5.17 as follows:</i></p> <p><b><u>Contributions towards The Greenway will need to be considered alongside the requirements of Policy EN7 and EN10 to ensure that requirements are proportionate and take into account the scale and location of the development, and that no double counting of contributions is requested. Contributions towards the Greenway will be sought from development located in settlements where there is access to The Greenway or where there are opportunities to create or enhance connections to The Greenway. A Supplementary Planning Document for Open Space and GI provision will be prepared to set out a step by step guide for calculating requirements.</u></b></p> <p><i>Remove Unsuitable Greenway Routes from Figure 8: The Greenway and amend the Legend as follows:</i></p> <p><del>Unsuitable Greenway Routes</del></p> | To address comment by British Horse Society (Rep 34/01) Hearing Action Points 149, 151, 153 |
| MM19 | Policy EN8   | 74    | <p><i>Amend Policy EN8 and delete footnote 62, add the text from the footnote to the end of the policy and amend as follows:</i></p> <p>The Greenway <b>routes, both existing and proposed</b>, as identified on the Policies Map <b>and figure 8 above, comprise</b> a priority Green Infrastructure project for the Council, requiring both investment and improvement to ensure its satisfactory delivery. <b><u>This includes the</u></b></p>   | To address Historic England comments. (Rep. 39/03 and SOCG)                                 |

Schedule of proposed Main Modifications – March 2023

|      |            |    |  |   |
|------|------------|----|--|---|
|      |            |    | <p><b><u>aspirational connections, where opportunities will be explored within the areas delineated by the dashed lines on the Policies Map and Figure 8.</u></b></p> <p>Development should; therefore</p> <ol style="list-style-type: none"> <li>a. be designed to protect and enhance the Greenway, and to strengthen connections to the wider green infrastructure network within the District;</li> <li>b. <b><u>Its development must protect and enhance heritage assets and their settings; and</u></b></li> <li>c. <b><u>on residential developments of 10 or more dwellings (or sites more than 0.5ha) and commercial sites of 1000m<sup>2</sup> or more which are located in settlements with access to The Greenway, or where there are opportunities to connect to The Greenway, contributions toward enhancement of The Greenway will be required in accordance with the most up to date standards set out in the SPD. Opportunities for the creation/ enhancement of connections to The Greenway will be required in line with EN7.</u></b></li> </ol> <p>The aim will be; to provide fully integrated connections along the Nene Valley; linking Wellingborough, Peterborough and <b>the</b> Rockingham Forest. This will be achieved via development or through mechanisms such as developer contributions<sup>62</sup> and additional funding streams where appropriate.</p> <p><b><u>Future maintenance of the Greenway and especially the area that adjoins it should be secured.</u></b> by legal agreement; be it by way of a financial developer contribution to the relevant public body towards management of the Greenway or through the setting up of a management company, as appropriate. <b><u>Developers should work with the Council to determine the most appropriate future maintenance arrangements.</u></b></p> <p><b><u>Footnote 62:</u></b> Future maintenance of the Greenway and especially the area that adjoins it should be secured by legal agreement; be it by way of a financial developer contribution to the relevant public body towards management of the Greenway or through the setting up of a management company, as appropriate</p> | <p>For greater clarity<br/>Hearing Action Point 152, 153, 155</p> |
| MM20 | Policy EN9 | 75 | <p><i>Amend Policy EN9 as follows:</i></p> <p>Policy EN9: Designation of Local Green Space</p>   | <p>Hearing Action Points 157, 158, 159, 160</p>                   |

Schedule of proposed Main Modifications – March 2023

|      |                  |         |  |   |
|------|------------------|---------|--|---|
|      |                  |         | <p>In accordance with the National Planning Policy Framework guidance, Local Green Space may be designated through Neighbourhood Plans, where <b><u>it has been identified by the community and</u></b> it fulfils the following criteria:</p> <p>a) The site is closely related to the main built up area of a <b><u>the</u></b> settlement <b><u>it is intended to serve</u></b>;</p> <p>b) Where local value can be demonstrated, in terms of providing one or more of the following functions:</p> <ul style="list-style-type: none"> <li>i) Defining the setting of a built up area</li> <li>ii) Archaeological or historical interest, including tourism related activities</li> <li>iii) Recreational importance</li> <li>iv) Tranquillity, or</li> <li>v) biodiversity; and</li> <li><b><u>vi) beauty; and</u></b></li> </ul> <p>c) The gross area of the site <del>does not exceed 0.5 ha or 10% of the</del> <b><u>should be proportionate to the</u></b> existing main built up area of the settlement, <del>whichever is larger.</del> <b><u>and not an extensive tract of land.</u></b></p> |   |
| MM21 | Para 5.25 - 5.31 | 76 - 78 | <p><i>Amend Para 5.25 amend second to last sentence and delete the last sentence (including footnote 65) as follows:</i></p> <p>The latter contains detailed standards regarding development contributions for open space, sport and recreational facilities, which will be replaced by the standards in this Plan (Tables 6-89, below; derived from the KKP study <b><u>or any subsequent updates</u></b>). <del>The KKP study should also be utilised in conjunction with other targeted investment strategies such as the Local Football Facility Plan (March 2020).</del></p> <p><i>Amend paragraph 5.30 as follows:</i></p> <p>New housing developments create additional need with regard to open space, however the viability of small housing schemes may be affected. Therefore, a threshold of 10 or more dwellings or <b><u>0.35</u></b> ha or more for housing schemes will be established for the requirement of</p>  | <p>To address Sport England comments. (Rep. 20/01)</p> <p>To address issues raised by Bellway Homes (Rep 26/02)</p> <p>Hearing Action Points 163, 164, 165, 166</p> |

Schedule of proposed Main Modifications – March 2023

|  |  |   |  |
|--|--|---|--|
|  |  | <p>developer contributions towards the provision and enhancement of open space which is suitable for children and younger people as well as older people. <b><u>The preference is for provision to be made onsite, however where sites are physically constrained, if necessary to achieve development viability, it may be appropriate to seek development contributions towards off-site provision <u>where this can be justified.</u></u></b></p> <p><i>Amend paragraph 5.31 as follows:</i></p> <p>The open space for the Sustainable Urban Extension of Rushden East will be dealt with as a separate matter and the precise detail of what is to be provided there will be agreed <del>via</del> <b><u>through Policy EN33 and informed by</u></b> the Masterplan Framework Document for that development (Appendix 6). Further direction is also provided at section 9.0 (Delivering sustainable urban extension) and Policy EN33 (section 9.0).</p> <p><i>Add two new paragraphs after paragraph 5.31 as follows:</i></p> <p><b><u>Open space requirements will be calculated using the most up to date evidence on open space. An Open Space SPD will be prepared which will provide a step by step guide for calculating open space requirements. Contributions toward open space would be spent in accordance with the Open Space Study and Local Infrastructure Plan.</u></b></p> <p><b><u>There is a clear relationship between open space and the green infrastructure network. Open spaces form an integral component of the green infrastructure network. To ensure a commensurate approach when determining contributions, the requirements of EN7 and EN8 should be taken into account. Opportunities to combine open space and green infrastructure schemes should be sought to optimise design and keep contributions proportionate. The Council will take care to avoid double counting between strategic and local green infrastructure and open space requirements when calculating contributions.</u></b></p> <p><i>Amend footnote 69 as follows:</i></p> <p>The figure of 0.04 ha per 1000 population is a minimum. <del>For the Rushden East SUE, the amount of provision will be dealt with via the Masterplan Framework Document.</del></p> |  |
|--|--|---|--|



Schedule of proposed Main Modifications – March 2023

|      |             |    |  |  |
|------|-------------|----|--|--|
| MM22 | Policy EN10 | 79 | <p><i>Amend Policy EN10 as follows:</i></p> <p><del>With the exception of the Rushden East Sustainable Urban Extension, <b>a</b>All</del> new residential development of 10 or more dwellings (or sites more than 0.35 ha) will be required to contribute to the enhancement and provision of open space to meet the needs of the population arising from the development.</p> <p>The provision of new open space will be required for development where there is <b>an identified quantitative and/ or qualitative need. Requirements will be determined in accordance with the most up-to-date evidence base</b> <del>insufficient access to existing open space identified within the local area<sup>70</sup>.</del> Where applicable, new open space will need to be provided in order to meet the following requirements <b>(or subsequent updates to these requirements set out in the most up-to-date evidence base):</b></p> <ul style="list-style-type: none"> <li>• Quality and value criteria in Table 6;</li> <li>• Accessibility standards in Table 7; and</li> <li>• Quantity standards in Table 8.</li> </ul> <p>Rushden East SUE will have its own bespoke open space, sport and recreation facilities which will be agreed in accordance with Policy EN33, via the Masterplan Framework Document for that development. <del>(Appendix 6).</del></p> <p>For all other qualifying development, contributions to enhance the quality and value of existing open space <b>onsite, or where appropriate offsite</b>, including enhanced connectivity between open spaces and the Green Infrastructure network within the locality, will be required. Developer contributions will be calculated based on the quantity standards for the scale of development proposed.</p> <p>The long term management and maintenance of all new open space must be secured. <del>This will be delivered by way of either adoption of the open space by the</del></p> | <p>To address Bellway Homes comment. (Rep. 26/02 and SOCG)</p> <p>Hearing Action Points 161, 162, 167, 168</p> |
|------|-------------|----|--|--|

Schedule of proposed Main Modifications – March 2023

|  |   |  | <p>relevant Town/ Parish Council, or the setting up of a management company. <b><u>Developers should work with the Council to determine the most appropriate long term management and maintenance arrangements.</u></b></p> <p>Delete footnote 70 as follows:</p> <p>'Local' is defined as Parish area; a reflection of the responsibilities of Town and Parish Councils for maintaining their stock of public open spaces</p>   |  |  |  |  |  |                  |               |                          |                         |              |                          |       |  |  |  |                                     |
|--|---|--|--|--|--|--|--|--|------------------|---------------|--------------------------|-------------------------|--------------|--------------------------|-------|--|--|--|-------------------------------------|
| MM23                                     | Supporting text to Policy EN11 paras 5.32 to 5.36 | 80-83  | <p>Add new sub heading above paragraph 5.32 as follows:</p> <p><b><u>Sport and Recreation</u></b></p> <p>Delete figure 9, footnote 71 and heading as follows:</p> <p><b>Figure 9: Playing Pitch Strategy and Action Plan – North and South areas<sup>72</sup></b></p> <p>Footnote 71 : KKP Playing Pitch Assessment, Figure 1.1</p> <p>Delete Table 9 as follows:</p> <table border="1"> <thead> <tr> <th colspan="5">Table 9: Playing pitch demand calculator</th> </tr> <tr> <th>Type of facility</th> <th>Analysis area</th> <th>Current demand shortfall</th> <th>Future demand shortfall</th> <th>Total demand</th> </tr> </thead> <tbody> <tr> <td>Football (grass pitches)</td> <td>North</td> <td>1.5 youth (11v11) match sessions<br/>1.5 youth (9v9) match sessions</td> <td>0.5 adult match sessions<br/>2.5 youth (11v11) match sessions<br/>2.5 youth (9v9) match sessions</td> <td>0.25 adult pitches<br/>2 youth (11v11) pitches<br/>2 youth (9v9) pitches</td> </tr> </tbody> </table> | Table 9: Playing pitch demand calculator                               |  |  |  |  | Type of facility | Analysis area | Current demand shortfall | Future demand shortfall | Total demand | Football (grass pitches) | North | 1.5 youth (11v11) match sessions<br>1.5 youth (9v9) match sessions | 0.5 adult match sessions<br>2.5 youth (11v11) match sessions<br>2.5 youth (9v9) match sessions | 0.25 adult pitches<br>2 youth (11v11) pitches<br>2 youth (9v9) pitches | Hearing Action Points 169, 170, 173 |
| Table 9: Playing pitch demand calculator |   |  |  |  |  |  |  |  |                  |               |                          |                         |              |                          |       |  |  |  |                                     |
| Type of facility                         | Analysis area                                     | Current demand shortfall   | Future demand shortfall  | Total demand   |  |  |  |  |                  |               |                          |                         |              |                          |       |  |  |  |                                     |
| Football (grass pitches)                 | North   | 1.5 youth (11v11) match sessions<br>1.5 youth (9v9) match sessions | 0.5 adult match sessions<br>2.5 youth (11v11) match sessions<br>2.5 youth (9v9) match sessions   | 0.25 adult pitches<br>2 youth (11v11) pitches<br>2 youth (9v9) pitches |  |  |  |  |                  |               |                          |                         |              |                          |       |  |  |  |                                     |

Schedule of proposed Main Modifications – March 2023

|  |  |  |  |              |  |  |  |  |  |
|--|--|--|--|--------------|--|--|--|--|--|
|  |  |  |  | South        | 2.5 adult match sessions<br>1 youth (11v11) match sessions<br>0.5 youth (9v9) match sessions | 4 adult match sessions<br>5 youth (11v11) match sessions<br>4.5 youth (9v9) match sessions | 3.25 adult pitches<br>3 youth (11v11) pitches<br>2.5 youth (9v9) pitches |  |  |
|  |  |  | Football (3G AGPs)   | North        | One 3G pitch   | -  | One 3G pitch   |  |  |
|  |  |  |  | South        | Demand being met   | -  | -  |  |  |
|  |  |  | Rugby pitches  | North        | 4.5 senior match sessions<br>3 mini match sessions   | -  | 2.25 senior pitches<br>1.5 mini pitches                                  |  |  |
|  |  |  |  | South        | 5 senior match sessions  | -  | 2.5 senior pitches   |  |  |
|  |  |  | Hockey (sand AGPs)   | Districtwide | Demand being met   | -  | -  |  |  |
|  |  |  | Cricket pitches  | North        | Demand being met   | -  | -  |  |  |
|  |  |  |  | South        | 2 match sessions   | 5 match sessions   | 3.5 pitches  |  |  |
|  |  |  | Tennis courts  | Districtwide | Demand being met   | -  | -  |  |  |
|  |  |  | Bowling greens   | Districtwide | Demand being met   | -  | -  |  |  |
|  |  |  | <p><i>Amend paragraph 5.36 as follows:</i></p> <p>Large scale housing <b>New</b> developments create additional need for sport and recreation facilities, therefore major <b>residential</b> developments <b>and strategic employment developments</b> will be required to provide developer contributions towards the provision and</p> |              |  |  |  |  |  |

Schedule of proposed Main Modifications – March 2023

|      |             |    |  |  |
|------|-------------|----|--|--|
|      |             |    | <p>enhancement of <b>sport and recreation facilities</b> playing pitches or make provision for these on site.</p> <p><i>Add new paragraph after 5.36 as follows:</i></p> <p><b><u>A Sports and Recreation SPD will be prepared to set out the process for determining contributions. This will set out a step by step process for calculating requirements using Sport England planning tools to inform decision making. The focus for investment of contributions will be the Playing Pitch Strategy (or subsequent update), and where appropriate, other relevant documents, including Sports Facilities Strategies, Physical Activity and Sports Frameworks, Health and Wellbeing Strategies, Neighbourhood Plans and/ or plans or strategies prepared by National Governing bodies for sport and physical activity.</u></b></p>  |  |
| MM24 | Policy EN11 | 84 | <p><i>Amend Policy EN11 as follows:</i></p> <p><del>For a</del><b><u>All other qualifying new residential development of 10 or more dwellings (or sites more than 0.5 ha) and employment development of 5ha or more will be required,</u></b> contributions to enhance the quality and value of existing <b>sports and recreation facilities</b> playing pitches within the locality <b><u>and/or create new facilities to meet needs arising from the development.</u></b> will be required, where these comply with the relevant legislation. Developer contributions will be calculated based on the quantity standards for the scale of development proposed. <b><u>most up-to-date evidence base.</u></b></p> <p>New strategic development for employment and housing will be required to contribute to the provision of playing pitches to meet the need arising from the development. Preference will be to meet that need through new onsite provision, though off-site provision and enhancement of existing facilities will be considered, where a need for such an approach can be fully justified<sup>73</sup>.</p> <p><b><u>Rushden East SUE will have its own bespoke sport and recreation facilities which will be agreed in accordance with Policy EN33 and set out in detail through the Masterplan Framework Document.</u></b></p> | Hearing Action Points 171, 172, 173, 174, 175, 176 |

## Schedule of proposed Main Modifications – March 2023

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <p>Playing pitches, sports or recreational facilities will be provided for strategic development, in accordance with the accessibility standards set out in Table 7 (above).</p> <p>For all other qualifying development, contributions to enhance the quality and value of existing playing pitches within the locality will be required, where these comply with the relevant legislation. Developer contributions will be calculated based on the quantity standards for the scale of development proposed.</p> <p>The long term management and maintenance of all new <b><u>sport and recreation facilities</u></b> playing pitches must be secured. This will be delivered by way of either adoption of the open space by the relevant <b><u>authority</u></b> Town/ Parish Council, or the setting up of a management company. <b><u>Developers should work with the Council to determine the most appropriate long term management and maintenance arrangements.</u></b></p> <p><i>Delete footnote 73 as follows:</i></p> <p>Strategic development sites are defined in the Joint Core Strategy as developments of 500 or more dwellings/ 5ha or more of employment uses</p> |  |
|--|--|--|---|--|

### Social Capital

|      |                 |    |   |  |
|------|-----------------|----|---|--|
| MM25 | Paras 6.10-6.11 | 87 | <p><i>Amend paragraph 6.10 (6<sup>th</sup> bullet point), as follows:</i></p> <p>Movement and access - providing infrastructure to encourage and enable access for all by prioritising <b><u>non-motorised means of transport such as</u></b> walking, cycling and <b><u>horse riding, together with</u></b> public transport, balancing access by private car with any negatives impacts.</p> <p><i>Amend paragraph 6.11 as follows:</i></p> <p>A range of good practice exists in regard to designing for good health and wellbeing. Three documents are cited as particularly useful references<sup>75</sup>. <b><u>The local planning authority also recognises the implications of air quality and pollution for health and wellbeing, and in July 2020 introduced a requirement for air quality assessments supporting planning</u></b></p> | <p>To address comments by the National Trust (Rep 27/01) and British Horse Society (Rep 34/03)</p> <p>To address comments from Natural</p> |
|------|-----------------|----|---|--|

Schedule of proposed Main Modifications – March 2023

|      |      |    |   |   |
|------|------|----|---|---|
|      |      |    | <b><u>applications/ proposals to be prepared in line with the latest EMAQN guidance [link to document already provided at section 1].</u></b>   | England (Rep 48/15)                                 |
| MM26 | EN12 | 88 | <p><i>Amend Policy EN12 as follows:</i></p> <p>Policy EN12: Health and wellbeing</p> <p>Development proposals should demonstrate that the design will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimising any negative health and wellbeing impacts, through:</p> <p>a) Effective application of the <b><u>design and</u></b> place shaping principles; <del>set out in Policy 8 of the Joint Core Strategy and other relevant development plan policies relating to the management and delivery of good design;</del></p> <p>b) Creating a distinctive, high quality and accessible public realm which promotes and encourages physical activity and social engagement;</p> <p>c) <del>Giving due consideration</del> <b><u>Having regard</u></b> to the implications for and access to healthcare services and demonstrate how this will be addressed;</p> <p>d) Engagement with local and national health bodies, including local NHS Clinical Commissioning Groups (<b><u>or replacement body</u></b>), to inform proposals relating to healthcare provision and / or access; and</p> <p>e) Undertaking Health Impact Assessments at an early stage <b><u>to ensure HIA influences</u></b> <del>in the design process,</del> <b><u>for example, through pre-application advice,</u></b> to ensure that the issues identified can be addressed or incorporated into the design proposals, <del>in accordance with</del> <b><u>and have regard to</u></b> the Northamptonshire Planning and Health Protocol.</p> <p>Health Impact Assessments will need to be objective and proportionate, dependent upon the scale of development proposed<sup>78</sup>. <b><u>In line with the Northamptonshire Planning and Health Protocol, all major development proposals (Development of 10 or more homes (or with a site area of 0.5 ha) or for non-residential development of 1000m<sup>2</sup> or more) will need to be accompanied by an appropriate HIA.</u></b></p> <p><i>Delete footnote 78 as follows:</i></p> | Hearings Action Points 122, 123, 124, 125, 126, 127 |

Schedule of proposed Main Modifications – March 2023

|      |             |    |   |  |
|------|-------------|----|---|--|
|      |             |    | As a guide, HIAs for large major development (say, 100 dwellings + or 5000m <sup>2</sup> floorspace +) are expected to be substantial, in accordance with the guidance set out in the Planning and Health Protocol and HIA toolkit  |  |
| MM27 | Policy EN13 | 90 | <p><i>Amend Policy EN13 as follows:</i></p> <p>Policy EN13: Design of Buildings/ Extensions</p> <p>Development proposals should relate well to and where possible enhance the surrounding environment, and will be supported where the design:</p> <ul style="list-style-type: none"> <li>a) Integrates positively with the surrounding area and creates a continuity of street frontage in terms of appearance, layout, massing and scale;</li> <li>b) Does not detract from the character of the existing building(s);</li> <li>c) Creates visual interest through careful use of detailing and appropriate materials;</li> <li>d) Is locally inspired where appropriate, reflecting local distinctiveness;</li> <li>e) Incorporates accessible and well-designed amenity space <b><u>proportionate to the scale of the unit</u></b> of an adequate size for the property and space for waste management to serve the needs of all end users;</li> <li>f) In the case of Houses in Multiple Occupation, <del>complies</del> <b><u>have regard to</u></b> with the minimum space standards as defined in ‘The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Order 2018 or any amendment to that Order;</li> <li>g) For all other developments, <del>meets the</del> <b><u>provide sufficient internal space in line with</u></b> National Space Standards as referred to in Criterion (b) of Policy 30 of the <del>Joint Core Strategy</del>; <b><u>and</u></b></li> <li>h) <del>Includes parking provision in line with the Countywide parking standards and, where appropriate, incorporates changing points for electric vehicles; and where appropriate, incorporates changing</del> <b><u>charging</u></b> points for electric vehicles; and</li> </ul> | <p>Hearings Action Points 128, 129, 130, 131</p> <p>To address Bellway comment (Rep. 26/03</p> |

Schedule of proposed Main Modifications – March 2023

|      |             |    |  |   |
|------|-------------|----|--|---|
|      |             |    | <p>i) Does not result in unacceptable problems of <b>significant harm arising from</b> light pollution.</p>  | SOCG)   |
| MM28 | Policy EN14 | 93 | <p><i>Amend Policy EN14 as follows:</i></p> <p>In considering proposals that affect a designated heritage asset or its setting, a <del>Conservation Area or a registered Historic Park and Garden or archaeological remains</del>, great weight will be given to the asset's conservation.</p> <p>Development proposals that <del>sustain</del> <b>protect</b> and enhance the character, appearance and significance of designated heritage assets (and their settings), and that put them to viable uses consistent with their conservation, will be supported.</p> <p><del>Proposals that would lead to harm to the significance of a designated heritage asset or its setting will not be supported, unless a clear and convincing justification of public benefit can be demonstrated to outweigh that harm, in terms of:</del></p> <p><del>a) the importance of the asset;</del><br/> <del>b) the scale of harm; and</del><br/> <del>c) where the nature and level of the public benefit of the proposal demonstrably outweighs the harm or loss.</del></p> <p><b><u>Where development:</u></b></p> <p>a) <b><u>protects and enhances heritage assets (including non-designated assets) and prevents harm to their significance and setting;</u></b><br/> b) <b><u>has been informed by a conservation area appraisal, landscape character assessment, village design statement of neighbourhood plan;</u></b><br/> c) <b><u>supports the sympathetic re-use of buildings of architectural or historic importance to ensure a positive contribution to the historic environment is maintained; and</u></b><br/> d) <b><u>conserves, protects and enhances heritage assets that are considered to be at risk.</u></b></p> | <p>Hearings Action Points 132, 133, 135</p> <p>To address Historic England's concerns. (Rep 39/04 SOCG)</p> |



Schedule of proposed Main Modifications – March 2023

| MM29  | Para 6.33 and Table 10  | 94 | <p><i>Amend Paragraph 6.33 as follows:</i></p> <p>In order to ensure consistency, Policy EN15 (<del>below</del>) sets out further guiding principles for preparing local lists. This is supported by Table 10 (<del>below</del>), which <b>and</b> provides clarity on the types of building, sites and structures that the Council considers to be non-designated heritage assets, thereby setting a local blueprint or methodology for preparing a local list. It is not necessary for an asset to meet all relevant criteria, and the state of repair of an asset is not a relevant consideration when deciding whether or not a building, site or structure is a heritage asset.</p> <p><i>Delete table 10 as follows:</i></p> <table border="1" data-bbox="667 603 1854 1343"> <thead> <tr> <th colspan="2" data-bbox="667 603 1854 671"><b><del>Table 10: Criteria for deciding whether a building/ site/ structure should be considered as a non-designated heritage asset</del></b></th> </tr> <tr> <th data-bbox="667 671 1021 707"><b><del>Type of asset</del></b></th> <th data-bbox="1021 671 1854 707"><b><del>Criteria for selection</del></b></th> </tr> </thead> <tbody> <tr> <td data-bbox="667 707 1021 1129"><del>Historic parks and gardens</del></td> <td data-bbox="1021 707 1854 1129"> <ul style="list-style-type: none"> <li><del>● Historic interest</del></li> <li><del>● Proportion of the original layout still in evidence</del></li> <li><del>● Influence on the development of taste whether through reputation or reference in literature</del></li> <li><del>● Early or representative of a style of layout</del></li> <li><del>● Work of a designer of local importance</del></li> <li><del>● Association with significant persons or historical events</del></li> <li><del>● Strong group value</del></li> <li><del>● Within, or contributing to, a locally significant landscape</del></li> </ul> </td> </tr> <tr> <td data-bbox="667 1129 1021 1343"><del>Buildings and structures</del></td> <td data-bbox="1021 1129 1854 1343"> <ul style="list-style-type: none"> <li><del>● Aesthetic/architectural merit</del></li> <li><del>● Historic association</del></li> <li><del>● Age and rarity</del></li> <li><del>● Completeness</del></li> <li><del>● Social or communal value</del></li> </ul> </td> </tr> </tbody> </table> | <b><del>Table 10: Criteria for deciding whether a building/ site/ structure should be considered as a non-designated heritage asset</del></b> |  | <b><del>Type of asset</del></b> | <b><del>Criteria for selection</del></b> | <del>Historic parks and gardens</del> | <ul style="list-style-type: none"> <li><del>● Historic interest</del></li> <li><del>● Proportion of the original layout still in evidence</del></li> <li><del>● Influence on the development of taste whether through reputation or reference in literature</del></li> <li><del>● Early or representative of a style of layout</del></li> <li><del>● Work of a designer of local importance</del></li> <li><del>● Association with significant persons or historical events</del></li> <li><del>● Strong group value</del></li> <li><del>● Within, or contributing to, a locally significant landscape</del></li> </ul> | <del>Buildings and structures</del> | <ul style="list-style-type: none"> <li><del>● Aesthetic/architectural merit</del></li> <li><del>● Historic association</del></li> <li><del>● Age and rarity</del></li> <li><del>● Completeness</del></li> <li><del>● Social or communal value</del></li> </ul> | Hearings Action Point 135 |
|---|---|----|---|---|--|---------------------------------|--|---------------------------------------|---|-------------------------------------|--|---------------------------|
| <b><del>Table 10: Criteria for deciding whether a building/ site/ structure should be considered as a non-designated heritage asset</del></b> |   |    |   |   |  |                                 |  |                                       |   |                                     |  |                           |
| <b><del>Type of asset</del></b>   | <b><del>Criteria for selection</del></b>  |    |   |   |  |                                 |  |                                       |   |                                     |  |                           |
| <del>Historic parks and gardens</del>   | <ul style="list-style-type: none"> <li><del>● Historic interest</del></li> <li><del>● Proportion of the original layout still in evidence</del></li> <li><del>● Influence on the development of taste whether through reputation or reference in literature</del></li> <li><del>● Early or representative of a style of layout</del></li> <li><del>● Work of a designer of local importance</del></li> <li><del>● Association with significant persons or historical events</del></li> <li><del>● Strong group value</del></li> <li><del>● Within, or contributing to, a locally significant landscape</del></li> </ul> |    |   |   |  |                                 |  |                                       |   |                                     |  |                           |
| <del>Buildings and structures</del>   | <ul style="list-style-type: none"> <li><del>● Aesthetic/architectural merit</del></li> <li><del>● Historic association</del></li> <li><del>● Age and rarity</del></li> <li><del>● Completeness</del></li> <li><del>● Social or communal value</del></li> </ul>  |    |   |   |  |                                 |  |                                       |   |                                     |  |                           |

Schedule of proposed Main Modifications – March 2023

|      |             |    |   |  |  |
|------|-------------|----|---|--|--|
|      |             |    | Assets of archaeological interest   | This Plan will follow the clarification provided by the Planning Practice Guidance <sup>88</sup> and Historic England guidance on Local Heritage Listing <sup>89</sup> as to what can be considered as a non-designated site of archaeological interest. These non-designated sites may be included in the Northamptonshire Historic Environment Record. |  |
| MM30 | Policy EN15 | 95 | <p><i>Amend Policy EN15 as follows:</i></p> <p>Development affecting a non-designated heritage asset<sup>90</sup> <b><u>(This relates to all relevant heritage assets buildings or structures, not just those on a local list, i.e. non-designated historic parks and gardens; buildings and structures; and/ or archaeological remains)</u></b> where it is designed sympathetically having regard to the significance of the asset, its features, character and setting will be supported. Development should seek to enhance the character of the non-designated heritage asset whether or not it is included in a local list.</p> <p><del>The assessment for proposals for the demolition or total loss of a non-designated heritage asset will take into account the significance of the asset and the scale of harm or loss.</del></p> <p><b><u>Non-designated heritage assets should be conserved in a manner consistent with their significance. The assessment of proposals for new development that would impact on the demolition or total loss of a non-designated heritage asset will take into account the significance of the asset and the scale of harm or loss.</u></b></p> <p><del>Whether a site, feature or structure is considered to be a non-designated heritage asset will be guided by the criteria set out in Table 10.</del><br/>         Table 10:<br/> <b><u>Whether a site, feature or structure is considered to be a non-designated heritage asset will be guided by the following criteria:</u></b></p> <p><b><u>Historic parks and gardens</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Historic interest</u></b></li> <li>• <b><u>Proportion of the original layout still in evidence</u></b></li> <li>• <b><u>Influence on the development of taste whether through</u></b></li> </ul> | <p>To address comments from the National Trust (Rep 27/01)</p> <p>Hearings Action Points 135, 136</p>  |  |

Schedule of proposed Main Modifications – March 2023

|      |           |    |   |  |
|------|-----------|----|---|--|
|      |           |    | <p><u>reputation or reference in literature</u></p> <ul style="list-style-type: none"> <li>• <u>Early or representative of a style of layout</u></li> <li>• <u>Work of a designer of local importance</u></li> <li>• <u>Association with significant persons or historical events</u></li> <li>• <u>Strong group value</u></li> <li>• <u>Within, or contributing to, a locally significant landscape</u></li> </ul> <p><u>Buildings and structures</u></p> <ul style="list-style-type: none"> <li>• <u>Aesthetic/architectural merit</u></li> <li>• <u>Historic association</u></li> <li>• <u>Age and rarity</u></li> <li>• <u>Completeness</u></li> <li>• <u>Social or communal value</u></li> </ul> <p><u>Assets of archaeological interest</u></p> <ul style="list-style-type: none"> <li>• <u><del>This Plan will follow</del> The clarification provided by the Planning Practice Guidance<sup>88</sup> and Historic England guidance on Local Heritage Listing<sup>89</sup> as to what can be considered as a non-designated site of archaeological interest will be used. These non-designated sites may be included in the Northamptonshire Historic Environment Record.</u></li> </ul> <p><i>Delete footnote 90 as follows:</i><br/> This relates to all buildings or structures, not just those on a local list, i.e. historic parks and gardens; buildings and structures; and/ or archaeological remains.</p> |  |
| MM31 | Para 6.49 | 99 | <p><i>Amend paragraph 6.49 by adding an additional sentence after the first sentence as follows:</i></p> <p>Policy EN16 a) sets out the relevant criteria for managing tourism and cultural developments in the Nene Valley corridor and the Rockingham Forest. <b><u>These should not adversely affect sensitive receptors (the SSSI and SPA) and would be subject to the SPA Mitigation Strategy with regard to potential impacts of tourism upon the integrity of the SPA/ Ramsar site.</u></b> Outside of these areas, Sequential and Impact Tests will apply for main town centre uses (i.e. cultural developments, hotels etc) in the normal way.</p> <p><i>Add new text after paragraph 6.49 as follows:</i></p>   | To address comments from Natural England (Rep 48/05) |

Schedule of proposed Main Modifications – March 2023

|      |             |        |   |  |
|------|-------------|--------|---|--|
|      |             |        | <p><b><u>The potential impacts of proposals for new tourism, cultural developments and tourist accommodation on the Upper Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the Special Protection Area SPD set out requirements for developments with the potential to have an adverse impact on the SPA. Development with the potential to cause an adverse effect on the SPA must meet the requirements of JCS Policy 4, or any subsequent replacement or update to that policy. A Habitats Regulations Assessment may be required to accompany any planning application to demonstrate the absence of any such adverse effect.</u></b></p>   | <p>To address recommendations of the HRA.</p> <p>Hearings Action Point 138</p> |
| MM32 | Policy EN16 | 99-100 | <p><i>Amend Policy EN16 as follows:</i></p> <p>a) Within the Destination Nene Valley corridor and Rockingham Forest areas, as shown on the Policies Map, proposals for the development of hotels (particularly in the South of the District), new tourist and/ or cultural assets, or the expansion of existing sites, to support established tourism assets, will be supported provided that these:</p> <ul style="list-style-type: none"> <li>i. <del>Are acceptable in terms of highways access, subject to compliance with other relevant policies;</del></li> <li>ii. <del>Do not adversely affect sensitive receptors (e.g. SSSI and SPA) and are accompanied by an Appropriate Assessment (in accordance with the Habitat Regulations) where required;</del></li> <li>iii. <del>Do not have a significant impact upon other types of designated and non-designated biodiversity sites;</del></li> <li>iv. <b>i.</b> Deliver enhanced connectivity to the Greenway and other defined Green Infrastructure corridors, as referred to in policies EN7 and EN8; and</li> <li>v. <b>ii.</b> Do not have an adverse impact on the surrounding countryside e.g. King's Cliffe Hills and Valleys area of tranquillity (Joint Core Strategy Policy 3(f)).</li> </ul> <p>Beyond the Destination Nene Valley corridor and Rockingham Forest areas, tourist and cultural developments will be supported where these comply with other relevant local and national planning policies.</p> | <p>Hearings Action Point 137</p>   |

Schedule of proposed Main Modifications – March 2023

|      |                                      |         |  |                                  |
|------|--------------------------------------|---------|--|----------------------------------|
|      |                                      |         | <p>b) Throughout the District, new-build tourist accommodation, or the conversion of dwellings or redundant or disused rural buildings to guest house or bed and breakfast use will be supported, where <del>this fulfils the following criteria, whereby:</del></p> <p>i) <del>Special regard shall be given to parking provision and the impact upon the amenity of neighbouring properties;</del></p> <p>ii) <del>New-build accommodation, where this fulfils the place-shaping principles of the Joint Core Strategy (Policy 8), is appropriate to its location and respects the setting, quality and character of its surrounding hinterland; and,</del></p> <p>iii) <del>In order to manage such developments it will be necessary to use suitable planning conditions and/ or legal agreements to ensure that these are retained for tourist accommodation<sup>93</sup>.</del></p> <p><b><u>In order to manage such developments it will be necessary to use suitable planning conditions and/ or legal agreements to ensure that these are retained for tourist accommodation<sup>93</sup>.</u></b></p>  |                                  |
| MM33 | Paras 6.53 to 6.57, Figure 11 and 12 | 101-103 | <p><i>Delete subheading below paragraph 6.52 as follows:</i></p> <p><b><i><del>New school proposal, Chelveston Road, Higham Ferrers</del></i></b></p> <p><i>Amend paragraph 6.53 as follows:</i></p> <p>The Government (DfE) has considered Rushden’s Growth Town status and the Rushden East allocation (Joint Core Strategy, Policy 33), initially putting forward proposals through the draft Plan consultation, November 2018 – February 2019 (Specialist School Site consultation paper, January 2020<sup>5</sup>). In light of the SUE proposals and strategic educational infrastructure requirements, the DfE and County Council have identified an overwhelming need for additional educational facilities for students aged 11-18 with a Statement of Special Educational Needs or an Education, Health and Care Plan for moderate learning difficulties to severe learning difficulties, including students with autism. This <del>has been</del><u>would be</u> addressed by the development of a new Free School to the south of Chelveston Road, <b><u>Higham Ferrers</u></b> (east of the town), with a full capacity of 145 pupils <b><u>which opened in September 2021.</u></b></p> | Hearings Action Points 139 & 140 |

Schedule of proposed Main Modifications – March 2023

|  |  |   |  |
|--|--|---|--|
|  |  | <p><i>Delete paragraphs 6.54 to 6.56 as follows:</i></p> <p>The DfE investigated 18 potential sites in seeking to identify a site to deliver this educational need. Through this assessment, land to the south of Chelveston Road /east of Newton Road, Higham Ferrers was identified as the most suitable, deliverable site (Sequential Site Assessment, Department for Education, January 2020). The 2.1ha site is located on greenfield land to the west of Moulton College. It is situated just beyond the Higham Ferrers urban area and Rushden East SUE (as shown in Figure 11, below).</p> <p>Planning permission was granted for a new school on 11 June 2020 (reference 19/02011/FUL). This should allow for implementation of the current proposals in accordance with the DfE's current plans, for opening the new school in September 2021. However, there may be wider contextual issues affecting the site in the medium/ longer term. It may be that educational needs change over time and the consented premises need to change to accommodate these. Accordingly, it is considered that a policy is still necessary in order to manage development in and around the new school in the medium/ long term.</p> <p>The new school, when implemented, will become part of a wider sports and educational hub, to the east of the Higham Ferrers urban area and north of the Rushden East sustainable urban extension. It adjoins Higham Town Football Club; a proposed new facility for the Northamptonshire Football Association, and Moulton College to the east. There are issues of security (i.e. child protection) affecting the new school, but the Local Plan should reflect the opportunities that the school and nearby facilities may offer.</p> <p><i>Delete figure 11 and title as follows:</i></p> <p><b>Figure 11: Sports Masterplan, Newton Road, Higham Ferrers (Planning Policy Committee, 20 January 2020, Item 6, Appendix 3)</b></p> <p><i>Delete paragraph 6.57 as follows:</i></p> <p>Further direction is provided by the Higham Ferrers Neighbourhood Plan. This provides a masterplanning/ development framework for Rushden East; those parts of the SUE situated within the parish of Higham Ferrers (Policy HF.H3). It also sets out local direction and guiding principles for the protection and enhancement of community facilities and supports the</p> |  |
|--|--|---|--|

Schedule of proposed Main Modifications – March 2023

|      |             |     |   |                                 |
|------|-------------|-----|---|---------------------------------|
|      |             |     | <p>development of new community facilities (including education) where appropriate (Policy HF.CD2).</p> <p>Delete Figure 12 and title as follows:</p> <p><b>Figure 12: Land to the west of Moulton College, Higham Ferrers</b></p>  |                                 |
| MM34 | Policy EN17 | 104 | <p>Delete Policy EN17 in its entirety as follows:</p> <p>Policy EN17: Land south of Chelveston Road, Higham Ferrers</p> <p>Land to the west of Moulton College—south of Chelveston Road—is allocated for the development of a new school. The development should provide for:</p> <ul style="list-style-type: none"> <li>a) Development of a school building and associated on-site infrastructure;</li> <li>b) Main vehicular and pedestrian access off Chelveston Road (north);</li> <li>c) Proportionate improvements to pedestrian and cycle arrangements in the locality, to provide enhanced connectivity with the main Higham Ferrers and Rushden urban areas (east/ west), and Rushden East sustainable urban extension (north/ south);</li> <li>d) Sufficient car parking and associated on-site servicing to meet the needs of students, employees and visitors; and</li> <li>e) Net gains to recreational open space provision and green infrastructure, including consideration of options for the sharing and enhancement of existing facilities with adjacent educational and sporting premises, contributing to the formation of a new sports and recreational hub to the east of Higham Ferrers.</li> </ul> | Hearings<br>Action Point<br>139 |

Schedule of proposed Main Modifications – March 2023

Economic Prosperity

|      |  |         |  |  |
|------|--|---------|--|--|
| MM35 | Para 7.17                                | 110     | <p>Add the word “target” into the third sentence as follows:</p> <p>...sets an overall requirement for a net growth <b>target</b> of 7,200 jobs...</p>   | <p>To clarify the context of job provision in line with the Joint Core Strategy</p> <p>Hearings Action Point 77</p>  |
| MM36 | Supporting text to Policy EN18 Para 7.34 | 115     | <p>Add two new paragraphs of text after paragraph 7.34 as follows:</p> <p><b><u>The potential impacts of proposals for new commercial development on the Upper Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the Special Protection Area SPD set out requirements for developments with the potential to have an adverse impact on the SPA. Development with the potential to cause an adverse effect on the SPA must meet the requirements of JCS Policy 4, or any subsequent replacement or update to that policy. A Habitats Regulations Assessment may be required to accompany any planning application to demonstrate the absence of any such adverse effect.</u></b></p> <p><b><u>The following policy seeks to support the potential for small and medium-size enterprises (SMEs) which play an important role in the economy, they are generally entrepreneurial in nature, helping to shape innovation. Small-sized enterprises typically number fewer than 50 employees, whilst medium-sized enterprise comprise less than 250 employees. In addition to small and mid-size companies, there are micro-companies, which employ up to 10 employees.</u></b></p> | <p>To address comments from Natural England (Rep 48/06)</p> <p>To address recommendations of the HRA.</p> <p>For consistency with Hearings Action Point 138</p> <p>Hearing Action Point 82</p> |
| MM37 | Policy EN18                              | 115-116 | <p>Amend Policy EN18 title to add the following words:</p> <p>Development of commercial space to support economic growth <b><u>for Small and Medium-sized enterprises</u></b></p>  | <p>Hearings Action Point 80,81</p>   |



Schedule of proposed Main Modifications – March 2023

|      |             |     |   |  |
|------|-------------|-----|---|--|
|      |             |     | <p><i>Amend Policy EN18 as follows:</i></p> <p>Future proposals for the development of new commercial employment space will be supported where these will deliver flexible, managed workspace for, small, <b>medium</b> and micro-businesses. Such projects should:</p> <ul style="list-style-type: none"> <li>a) Provide a range of unit sizes to meet demand across the whole business pipeline;</li> <li>b) Provide for adequate parking, in line with the Northamptonshire Parking Standards<sup>113</sup>;</li> <li>c) Deliver pedestrian, cycle and public transport connections to adjacent businesses, residential areas and public open spaces, to maximise integration with the surrounding locality<sup>114</sup>;</li> <li>d) Allow for opportunities for future expansion in the medium/ longer term;</li> <li>e) Not give rise to unacceptable impacts upon the amenity of adjoining business premises; and</li> <li>f) Where necessary, include suitable structural landscaping, in recognition of its wider setting.</li> </ul> |  |
| MM38 | Policy EN19 | 119 | <p><i>Amend Policy EN19 as follows:</i></p> <p>The existing employment sites, as shown on the Policies Map, are protected for employment use<sup>117</sup>. Proposals for re-development or changes of use of existing buildings should ensure that the overall provision of employment <b>on the site after development</b> is no less than that of the current or most recent use. A reduction in the level of employment <b>net job numbers/employment land</b> or development for non-employment uses can only be supported where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a) There is no realistic prospect of the site or buildings being used or re-used, including redevelopment, for employment purposes<sup>118</sup>; <b>and/or</b></li> </ul>  | <p>Hearings Action Point 83</p> <p>To address comments from Crown Estate (Reps 44/04 and 44/05)</p> <p>Additional policy amendments Hearings</p> |

## Schedule of proposed Main Modifications – March 2023

|      |  |     |  |   |
|------|--|-----|--|---|
|      |  |     | <p>b) Constraints associated with the site or buildings mean these would be unsuitable for re-use, in terms of siting, design, access, layout and relationship to neighbouring buildings and uses; <del>and</del></p> <p>e) <del>Development contributions will be made to support economic development across the district<sup>119</sup>.</del></p>   | Action Points 84, 85  |
| MM39 | Supporting text to Policy EN20 Para 7.49 | 120 | <p><i>Add new text after para 7.48 as follows:</i></p> <p><b><u>The potential impacts of proposals for the expansion or relocation of existing business premises on the Upper Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the Special Protection Area SPD set out requirements for developments with the potential to have an adverse impact on the SPA. Development with the potential to cause an adverse effect on the SPA must meet the requirements of JCS Policy 4, or any subsequent replacement or update to that policy. A Habitats Regulations Assessment may be required to accompany any planning application to demonstrate the absence of any such adverse effect.</u></b></p>  | <p>To address comments from Natural England (Rep 48/07)</p> <p>For consistency with Hearings Action Point 138</p> |
| MM40 | Policy EN20                              | 120 | <p><i>Amend Policy EN20 as follows:</i></p> <p>Proposals for the extension of existing business premises beyond their current curtilages <del>will be supported, provided that these do not result in unacceptable impacts upon the amenities of neighbouring properties.</del> <b><u>or for businesses that need to relocate, will be supported where they meet the following criteria:</u></b></p> <p><del>Where businesses need to relocate from their current premises or retain their existing premises and grow into a new bespoke space, this will be supported where a suitable site is available; one that:</del></p> <p>a) Is adjacent to an existing built up area, <del>provided that</del> <b><u>and</u></b> that there is no significant impact on the countryside, <del>or character of the surroundings,</del> <b><u>ecology, highways, the character of the surroundings or the amenity of neighbouring properties;</u></b></p> <p>b) <del>Would not result in a significant impact on the countryside, ecology, highways, the character of the surrounding and the amenity of neighbouring or nearby properties:</del></p> | Hearings Action Point 86  |

Schedule of proposed Main Modifications – March 2023

|      |                                |           |  |   |
|------|--------------------------------|-----------|--|---|
|      |                                |           | <p>c) Where necessary, is suitable for the provision of HGV or commercial vehicular access to the strategic or classified road network</p> <p>d) <del>b)</del> For main town centre uses, if applicable, meets the requirements of the sequential and impact tests; and</p> <p>e) <del>c)</del> Provides maximum accessibility for the workforce by sustainable modes of transport such as walking, cycling and public transport.</p>  |   |
| MM41 | Supporting Text to Policy EN21 | 121 - 124 | <p>Table 13 – amend title of the third column as follows:</p> <p>Designated primary shopping area/ <b>frontage</b> (since 2012 NPPF)</p> <p>Add new text after para 7.56:</p> <p><b><u>The town centre boundaries are shown on the policies map. The town centre boundaries effectively function as the primary shopping areas reflecting the relatively small size of the town centres which do not have areas of predominantly leisure, business and town centre uses adjacent to the primary shopping frontages. For clarification, for the purpose of criterion a of Policy 12 of the JCS and for the consideration of edge of centre proposals in accordance with the NPPF, where town centres do not have a defined Primary Shopping Area, ‘edge of centre’ will for retail purposes be considered as within 300m from the town centre boundary.</u></b></p> <p><b><u>Local regeneration strategies will be prepared for town centres to assist town centre regeneration. These strategies could range from comprehensive town centre masterplans to site specific development briefs and could also include Town Centre design codes.</u></b></p> | <p>To ensure the geographical application is illustrated on the policies map.</p> <p>Hearing Action Points 95, 96</p> |
| MM42 | Policy EN21                    | 124       | <p>Amend Policy EN21 as follows:</p>   | <p>To ensure the geographical application is</p>  |

Schedule of proposed Main Modifications – March 2023

|      |             |     |   |   |
|------|-------------|-----|---|---|
|      |             |     | <p>Development within the town centre boundaries <b><u>of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds<sup>8</sup> and Thrapston</u></b>, as shown on the Policies Map will be supported where this will achieve vibrant and viable town centres. Development should deliver increased vitality, through all or <b><u>where appropriate</u></b> some of the following:</p> <ul style="list-style-type: none"> <li>a) At street level, maintaining a balance and mix of main town centre uses, <del>including both convenience and comparison retailing, financial services and/ or food and drink businesses;</del></li> <li>b) Opportunities for a mixture of businesses, residential and live-work units, including at first floor level and above;</li> <li>c) Avoiding an over concentration of a particular <b><u>town centre use</u></b><del>Use Class</del>, with the exception of retailing;</li> <li>d) Retaining a predominantly retail offer for the defined <b><u>primary shopping frontages, as shown on the policies map;</u></b></li> <li>e) Enhancing the streetscape, to maximise opportunities for increased footfall;</li> <li>f) Improving the connectivity between High Streets, town centre car parking and the surrounding urban hinterland with a particular focus on cycling and walking; and</li> <li>g) Preparing local <b><u>regeneration</u></b><del>development</del> strategies to encourage the re-use of vacant and redundant premises for a balanced mix of uses, including where appropriate residential uses, to revitalise the character of town centres.</li> </ul> | <p>illustrated on the policies map.</p> <p>Hearing Action Points 87, 90, 91, 92, 93, 96</p> |
| MM43 | Policy EN22 | 126 | <p><i>Amend Policy EN22 as follows:</i></p> <p>Proposals for retail development outside the <b><u>town centre boundaries</u></b> <del>primary shopping areas of the six town centres</del> <b><u>Rushden, Higham Ferrers, Irthlingborough, Oundle,</u></b></p>  | <p>To ensure the geographical application is illustrated on the policies map.</p>           |

<sup>8</sup> In Raunds this applies to development within the Primary Shopping Area defined through the Neighbourhood Plan

## Schedule of proposed Main Modifications – March 2023

|      |                                |     |  |   |
|------|--------------------------------|-----|--|---|
|      |                                |     | <p><b>Raunds<sup>9</sup> and Thrapston, as shown on the policies map,</b> should be supported by an appropriate impact assessment, where the following floorspace thresholds are exceeded:</p> <p>a) Rushden <b>Town Centre</b> 280m<sup>2</sup>; and</p> <p>b) Market Towns <b>Centres</b> 100m<sup>2</sup>.</p> <p>Impact assessments <b>and Sequential tests</b> should be prepared in accordance with the relevant national guidance<sup>10</sup>. Failure to demonstrate there will be no significant <b>adverse</b> impact would result in a refusal of planning permission.</p> | Hearings<br>Action Points<br>97, 98, 99,<br>100, 101  |
| MM44 | Supporting text to Policy EN23 | 129 | <p><i>Add new text after paragraph 7.76 as follows:</i></p> <p><b><u>Class E of the Use Class Order provides significant flexibility in changes of use between main town centre uses. Policy EN23 seeks to support specific types of main town centre uses to reflect the role of these centres in serving the immediate local area. In some circumstances it may be necessary to remove permitted development rights to ensure that the local centres maintain their role in serving the needs of the immediate neighbourhood.</u></b></p>  | To set out the circumstances which may result in the removal of permitted development rights.               |
| MM45 | Policy EN23                    | 130 | <p><i>Amend policy EN23 as follows:</i></p> <p><b>Policy EN23: Development of main town centre uses around the Local Centres</b></p> <p><del>For</del> <b><u>Proposals of a scale and type limited to serving the immediate local area, minor development schemes<sup>14</sup> which are adjoining or closely related to</u></b> within 200m<sup>12</sup> of the designated local centres, <b><u>as set out below and shown on the policies map, will be</u></b></p>   | To ensure it is clear that the geographical application is illustrated on the policies map.<br><br>Hearings |

<sup>9</sup> In Raunds this applies to development outside the Primary Shopping Area defined through the Neighbourhood Plan

<sup>10</sup> The Planning Practice Guidance provides full details about the obligations for undertaking a main town centre uses impact assessment: “Ensuring the vitality of town centres”: <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

<sup>14</sup> Minor schemes are those of less than 1000m<sup>2</sup> floorspace; the national standard threshold for major planning applications

<sup>12</sup> 300m is the national standard for “edge of centre” developments. On this basis, a reduced threshold (200m) has been suggested for “edge of local centre” development schemes involving main town centre uses.

**Schedule of proposed Main Modifications – March 2023**

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <p><b>supported for</b>, there will be a general presumption in favour of the following types of 'main town centre' uses:</p> | <p>Action points<br/>102, 103,<br/>104,105, 106,<br/>107</p> |
|--|--|--|---|--|

Schedule of proposed Main Modifications – March 2023

|  |  |   |  |
|--|--|---|--|
|  |  | <ul style="list-style-type: none"> <li>• Convenience retailing;</li> <li>• Financial services;</li> <li>• Community facilities;</li> <li>• Eating and drinking establishments; and</li> <li>• Local leisure facilities.</li> </ul> <p><b><u>Designated Local Centres:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>London Road/ Michael Way, Raunds</u></b></li> <li>• <b><u>High Street South, Rushden</u></b></li> <li>• <b><u>Wellingborough Road, Rushden</u></b></li> <li>• <b><u>Grangeway Shopping Precinct, Rushden</u></b></li> <li>• <b><u>2-12 Blackfriars, Rushden</u></b></li> <li>• <b><u>Rushden East SUE</u></b></li> <li>• <b><u>Hall Hill/ High Street, Brigstock</u></b></li> <li>• <b><u>High Street, Ringstead</u></b></li> <li>• <b><u>Church Street/ High Street, Stanwick</u></b></li> <li>• <b><u>High Street/ The Green, Woodford</u></b></li> </ul> <p>Such proposals will be supported, provided that they:</p> <ol style="list-style-type: none"> <li>a) Deliver an overall enhancement to the neighbourhood offer for ‘day to day’ local services;</li> <li>b) Improve connectivity for pedestrians and cyclists, between the designated local centre and the adjacent neighbourhood, where appropriate;</li> <li>c) Do not adversely affect local amenity, through providing an unacceptable impact through increasing antisocial behaviour, noise, smell or other impacts, and fulfil other relevant development management criteria within the Local Plan;</li> </ol> <p><b><u>Permitted developments rights may be removed where exceptional circumstances are considered to exist.</u></b></p> <ol style="list-style-type: none"> <li>d) <del>Are subject to the removal of permitted development rights to prevent changes of use in appropriate circumstances; and</del></li> <li>e) <del>Are justified by means of an impact assessment where proposals are over the</del></li> </ol> |  |
|--|--|---|--|

## Schedule of proposed Main Modifications – March 2023

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <p>thresholds given in Policy EN21.</p> <p>In large villages which do not have designated local centres sites that are proposed for 'main town centre' uses will be considered on their merits.</p> |  |
|--|--|--|---|--|

### Housing Delivery

|      |   |            |  |   |
|------|---|------------|--|---|
| MM46 | Para 8.3                                | 132        | <p><i>Add the following text after paragraph 8.3:</i></p> <p><b><u>Paragraph 69 of the NPPF requires that land to accommodate at least 10% of the housing requirement is provided on sites no larger than 1 hectare. The Council meets this requirement, (evidence is contained within Background Paper 10 – Rural Housing Update July 2021).</u></b></p>  | Hearings Action Point 34                    |
| MM47 | Para 8.4                                | 132        | <p><i>Provide a new paragraph after paragraph 8.4 as follows:</i></p> <p><b><u>The National Planning Policy Framework requires that, where appropriate, plans should set out the anticipated rate of development of specific sites. The Housing Trajectory is set out in Appendix 6. The Housing Trajectory demonstrates that the supply of sites available in the plan period will deliver homes in excess of the requirements identified in the Joint Core Strategy.</u></b></p> | In response to request from Inspector       |
| MM48 | Paras 8.5 to 8.15, inc tables 14 and 15 | 132 to 136 | <p><i>Amend paragraph 8.5 as follows:</i></p> <p>A number of significant development sites have already come forward (i.e. under construction or having extant planning permission) at each of the six towns (Rushden, Raunds, Irthlingborough, Thrapston, Higham Ferrers and Oundle) during the first <del>89</del> years of the Plan period (2011-2019<del>2019</del><b>2020</b>). Alongside these, a large number of smaller development sites have</p>                         | To update with 2020 monitoring information. |



Schedule of proposed Main Modifications – March 2023

|                      |                             | <p>also come forward; these are included in the latest (2019<del>2020</del>) AMR Housing Site Schedule 13</p> <p><i>Amend paragraph 8.6 as follows:</i></p> <p>At Raunds, development sites to the north, north-east and south of the town have progressed on the basis of the previous Local Plan (2008 Core Spatial Strategy) and are now under construction or mostly complete. Similarly, the Thrapston South urban extension (allocated in the previous Local Plan) is also <b>mostly</b> complete (earlier development phases) or under construction (later development phases). Within the district three further major development sites are committed during the Plan period. Details about these sites are set out in Table 15, below.</p> <p><i>Amend table 15 as follows:</i></p> <table border="1"> <thead> <tr> <th colspan="8">Table 15 Major sites</th> </tr> <tr> <th>Location</th> <th>Site name</th> <th>Total Capacity</th> <th>No of units, 2019-2020-2031</th> <th>Delivery beyond 2031</th> <th>Development Plan Document</th> <th>Current status</th> <th>Note</th> </tr> </thead> <tbody> <tr> <td>Rushden</td> <td>Rushden East</td> <td><del>2,500</del><br/><b>2,700</b></td> <td><del>1,200</del><br/><b>1250</b></td> <td><del>1,300</del><br/><b>1450</b></td> <td>Local Plan (JCS Policy 33)</td> <td>New strategic site/ SUE</td> <td></td> </tr> <tr> <td>Higham Ferrers</td> <td>Land East of Ferrers School</td> <td>300</td> <td>300</td> <td>0</td> <td>Higham Ferrers Neighbourhood Plan</td> <td>Self contained strategic site allocation</td> <td></td> </tr> </tbody> </table> | Table 15 Major sites            |                                 |                                   |  |      |  |  |  | Location | Site name | Total Capacity | No of units, 2019-2020-2031 | Delivery beyond 2031 | Development Plan Document | Current status | Note | Rushden | Rushden East | <del>2,500</del><br><b>2,700</b> | <del>1,200</del><br><b>1250</b> | <del>1,300</del><br><b>1450</b> | Local Plan (JCS Policy 33) | New strategic site/ SUE |  | Higham Ferrers | Land East of Ferrers School | 300 | 300 | 0 | Higham Ferrers Neighbourhood Plan | Self contained strategic site allocation |  |  |
|----------------------|-----------------------------|--|---------------------------------|---------------------------------|-----------------------------------|--|------|--|--|--|----------|-----------|----------------|-----------------------------|----------------------|---------------------------|----------------|------|---------|--------------|----------------------------------|---------------------------------|---------------------------------|----------------------------|-------------------------|--|----------------|-----------------------------|-----|-----|---|-----------------------------------|--|--|--|
| Table 15 Major sites |                             |  |                                 |                                 |                                   |  |      |  |  |  |          |           |                |                             |                      |                           |                |      |         |              |                                  |                                 |                                 |                            |                         |  |                |                             |     |     |   |                                   |  |  |  |
| Location             | Site name                   | Total Capacity   | No of units, 2019-2020-2031     | Delivery beyond 2031            | Development Plan Document         | Current status                           | Note |  |  |  |          |           |                |                             |                      |                           |                |      |         |              |                                  |                                 |                                 |                            |                         |  |                |                             |     |     |   |                                   |  |  |  |
| Rushden              | Rushden East                | <del>2,500</del><br><b>2,700</b>   | <del>1,200</del><br><b>1250</b> | <del>1,300</del><br><b>1450</b> | Local Plan (JCS Policy 33)        | New strategic site/ SUE                  |      |  |  |  |          |           |                |                             |                      |                           |                |      |         |              |                                  |                                 |                                 |                            |                         |  |                |                             |     |     |   |                                   |  |  |  |
| Higham Ferrers       | Land East of Ferrers School | 300  | 300                             | 0                               | Higham Ferrers Neighbourhood Plan | Self contained strategic site allocation |      |  |  |  |          |           |                |                             |                      |                           |                |      |         |              |                                  |                                 |                                 |                            |                         |  |                |                             |     |     |   |                                   |  |  |  |

<sup>13</sup> Planning Policy Committee, 8 June 2020, Agenda Item 10, Appendix 3: [https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee) [https://www.east-northamptonshire.gov.uk/downloads/download/5073/2020\\_annual\\_position\\_statement](https://www.east-northamptonshire.gov.uk/downloads/download/5073/2020_annual_position_statement)

Schedule of proposed Main Modifications – March 2023

|  |  |  |                 |   |                                  |                              |                                  |                           |                     |  |
|--|--|--|-----------------|---|----------------------------------|------------------------------|----------------------------------|---------------------------|---------------------|--|
|  |  |  | Irthlingborough | West of Huxlow School/ Irthlingborough West | 700                              | <del>250</del><br><b>200</b> | <del>450</del><br><b>500</b>     | N/a - Resolution to grant | Strategic site/ SUE | Commitment on basis of (now defunct) 2008 Core Spatial Strategy of JCS Annex A |
|  |  |  | <b>TOTAL</b>    | <b>Major urban extensions</b>               | <del>3,500</del><br><b>3,700</b> | <b>1,750</b>                 | <del>1,750</del><br><b>1,950</b> |                           |                     |  |
| <p><i>Amend paragraph 8.7 as follows:</i></p> <p>As at 1 April 2019<del>20</del>, the outstanding housing requirement for the six urban areas has been calculated, by way of deducting the following elements for each town:</p> <ul style="list-style-type: none"> <li>• Completions, 1 April 2011 – 31 March 2019<del>20</del>;</li> <li>• Commitments (i.e. extant planning permissions or previously allocated sites), as at 1 April 2019<del>20</del> (2019<del>20</del> AMR, Housing Site Schedule);</li> <li>• Major development sites (Table 16<del>5</del>, above) plus other emerging proposed development sites identified in the 2018<del>20</del> AMR Housing Site Schedule).</li> </ul> <p><i>Amend table 16 as follows:</i></p> |  |  |                 |   |                                  |                              |                                  |                           |                     |  |

Schedule of proposed Main Modifications – March 2023

|  |                                  | Table 16:<br>Urban areas<br>residual<br>housing<br>requirement,<br>as at 1 April<br><del>2019</del> 2020 |                                    |   |   |  |   |  |
|--|----------------------------------|--|------------------------------------|---|---|--|---|--|
|  | Housing requirement<br>(2011-31) | Completions 2011- <del>18</del> 19   | Completions 2019- <del>19</del> 20 | % housing requirement<br>delivered as at 31 March<br><del>2019</del> 20 | Commitments (starts<br>and planning<br>permissions) as at 1<br>April <del>2019</del> 20 | Commitments<br>(resolutions to grant,<br>Development Plan<br>allocations, Rushden<br>East) as at 1 April<br><del>2019</del> 20 | Residual requirement as<br>at 1 April <del>2019</del> 20<br>(committed sites<br>deducted) |  |
| <b>Growth Town</b>                               |                                  |  |                                    |   |   |  |   |  |
| Rushden  | 3,285                            | 953<br><b>1,036</b>  | 83<br><b>19</b>                    | 31.5%<br><b>32.1%</b>   | 63<br><b>175</b>  | 1,760<br><b>1,515</b>  | 426<br><b>540</b>   |  |
| <b>Market Towns</b>                              |                                  |  |                                    |   |   |  |   |  |
| Higham<br>Ferrers                                | 560                              | 358<br><b>370</b>  | 12<br><b>4</b>                     | 66.1%<br><b>66.8%</b>   | 4<br><b>3</b>   | 300  | -114<br><b>-117</b>   |  |
| Irthlingborough                                  | 1,350                            | 283<br><b>320</b>  | 37<br><b>27</b>                    | 23.7%<br><b>25.7%</b>   | 171<br><b>149</b>   | 329<br><b>280</b>  | 530<br><b>574</b>   |  |
| Raunds   | 1,060                            | 387<br><b>662</b>  | 275<br><b>47</b>                   | 62.5%<br><b>66.9%</b>   | 466<br><b>347</b>   | 0  | 68<br><b>4</b>  |  |
| Thrapston  | 680                              | 190<br><b>202</b>  | 12<br><b>223</b>                   | 29.7%<br><b>62.5%</b>   | 486<br><b>260</b>   | 0  | -8<br><b>-5</b>   |  |
| Oundle   | 645                              | 384<br><b>392</b>  | 8<br><b>3</b>                      | 60.8%<br><b>61.2%</b>   | 7<br><b>11</b>  | 70   | 176<br><b>169</b>   |  |
| <b>TOTAL</b>                                     | <b>7,580</b>                     | <b>2,555</b><br><b>2,982</b>   | <b>427</b><br><b>323</b>           | <b>39.3%</b><br><b>43.6%</b>  | <b>1,197</b><br><b>945</b>  | <b>2,459</b><br><b>2,165</b>   | <b>942</b><br><b>1,165</b>  |  |
| <i>Amend and split paragraph 8.9 as follows:</i> |                                  |  |                                    |   |   |  |   |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |  |
|--|--|--|--|
|  |  | <p>Table 16 shows that as at 1 April 2019<del>20</del> JCS housing requirements for Higham Ferrers, Raunds and Thrapston are being met, through housing completions (1,234<del>799</del>) and housing commitments (1,256<del>563</del>). <b><u>A minimal residual requirement has been identified for Raunds (4 dwellings), but other emerging and brownfield site proposals identified in the 2020 Annual Position Statement (total 88 dwellings) are more than sufficient to address the housing requirements for the town.</u></b></p> <p>Outstanding residual housing requirements have been identified at Rushden (426<del>540</del> dwellings), Irthlingborough (530<del>574</del> dwellings) and Oundle (476<del>169</del> dwellings) Further detail about how these residual requirements will be addressed is set out at paragraphs 8.10-8.12, below. It is necessary, therefore, for this Plan to address the outstanding residual requirements for Rushden, Irthlingborough and Oundle. Further details about these outstanding requirements are set out in the <b><u>updated (2020)</u></b> urban housing Background Paper (BP9)<sup>14</sup>.</p> <p><i>Amend paragraph 8.10 as follows:</i></p> <p>For Rushden, commitments consist of extant planning permissions (<del>63 dwellings and</del> <b><u>plus outstanding</u></b> Neighbourhood Plan site allocations (<del>560</del> <b><u>total 315</u></b> dwellings); with 4,200 <b><u>1,050</u></b> dwellings at Rushden East anticipated to be delivered by 2031. This equates to an outstanding requirement for 426 <b><u>540</u></b> dwellings. A further <del>420</del> <b><u>134</u></b> dwellings housing land supply is identified at specific unallocated brownfield sites within the urban area, equating to a residual requirement for <del>306</del> <b><u>406</u></b> dwellings.</p> <p><i>Amend paragraph 8.11 as follows:</i></p> <p>For Irthlingborough, commitments for <del>500</del> <b><u>429</u></b> dwellings are identified within the <del>2019</del> <b><u>2020</u></b> housing land supply. A further <del>207</del> <b><u>199</u></b> dwellings is included within the housing land supply, consisting of specific brownfield sites and other emerging sites which did not, as at 1 April <del>2019</del> <b><u>2020</u></b>, have planning permission. These emerging sites reduce the residual requirement to <del>323</del> <b><u>375</u></b> dwellings. Table 15 (above) shows the latest position for the Irthlingborough West urban extension; namely that the trajectory for this site has been set back until later during the Plan period, such that just <del>250</del> <b><u>200</u></b> (out of 700) dwellings are now anticipated to come</p> |  |
|--|--|--|--|

<sup>14</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12110/background\\_paper\\_9\\_-\\_housing\\_requirements\\_-\\_urban](https://www.east-northamptonshire.gov.uk/downloads/file/12110/background_paper_9_-_housing_requirements_-_urban) [link to updated BP9 to be added]

Schedule of proposed Main Modifications – March 2023

|   |   | <p>forward within the Plan period. While Irthlingborough West remains a commitment, it is expected that this site could only begin to deliver late in the Plan period.</p> <p><i>Amend paragraph 8.12 as follows:</i></p> <p>A residual requirement for a further <del>476</del><b>169</b> dwellings at Oundle is identified, where additional strategic land allocations are required to meet this target. This residual figure for <del>476</del><b>169</b> dwellings at Oundle includes the previous Local Plan allocations at Ashton Road/ Herne Road Phase 2 (50 dwellings) and Dairy Farm (20 dwellings). If these sites are excluded, the Oundle residual requirement would rise to <del>246</del><b>239</b> dwellings<sup>15</sup>, as a minimum.</p> <p><i>Amend paragraph 8.13 as follows:</i></p> <p>Table 5 of the Joint Core Strategy sets a district-wide rural housing requirement for 820 dwellings. This has implications for all rural parishes across the district. Table 17 (below) sets out a current position statement for the residual rural housing requirement, as at 1 April <del>2019</del><b>2020</b>.</p> <p><i>Amend Table 17 as follows:</i></p> <table border="1" data-bbox="645 874 1850 1262"> <thead> <tr> <th><b>Table 17: Rural areas residual housing requirement, as at 1 April <del>2019</del><b>2020</b></b></th> <th><b>District rural housing requirement 2011-31</b></th> </tr> </thead> <tbody> <tr> <td><b>JCS rural housing requirement 2011-31</b></td> <td><b>820</b></td> </tr> <tr> <td>Rural housing completions 2011-<del>48</del><b>19</b></td> <td><del>-467</del><b>-513</b></td> </tr> <tr> <td>Rural housing completions 2018<del>19</del>-<del>19</del><b>20</b></td> <td><del>-46</del><b>-65</b></td> </tr> <tr> <td>Extant planning permissions as at 1 April <del>2019</del><b>2020</b> (as shown in <del>2019</del><b>2020</b> AMR housing site schedule)</td> <td><del>-171</del><br/><b>-124</b></td> </tr> <tr> <td>Local Plan/ Neighbourhood Plan site allocations (as at 1 April <del>2019</del><b>2020</b>)</td> <td><del>-90</del><b>-136</b></td> </tr> <tr> <td>Emerging Neighbourhood Plan site allocations, other emerging rural sites (&gt;4 dwellings), as at 1 April <del>2019</del><b>2020</b></td> <td><del>-89</del><br/><b>-58</b></td> </tr> <tr> <td><b>RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL <del>2019</del><b>2020</b></b></td> <td><del>-43</del><b>-76</b></td> </tr> </tbody> </table> | <b>Table 17: Rural areas residual housing requirement, as at 1 April <del>2019</del><b>2020</b></b> | <b>District rural housing requirement 2011-31</b> | <b>JCS rural housing requirement 2011-31</b> | <b>820</b> | Rural housing completions 2011- <del>48</del> <b>19</b> | <del>-467</del> <b>-513</b> | Rural housing completions 2018 <del>19</del> - <del>19</del> <b>20</b> | <del>-46</del> <b>-65</b> | Extant planning permissions as at 1 April <del>2019</del> <b>2020</b> (as shown in <del>2019</del> <b>2020</b> AMR housing site schedule) | <del>-171</del><br><b>-124</b> | Local Plan/ Neighbourhood Plan site allocations (as at 1 April <del>2019</del> <b>2020</b> ) | <del>-90</del> <b>-136</b> | Emerging Neighbourhood Plan site allocations, other emerging rural sites (>4 dwellings), as at 1 April <del>2019</del> <b>2020</b> | <del>-89</del><br><b>-58</b> | <b>RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL <del>2019</del><b>2020</b></b> | <del>-43</del> <b>-76</b> |  |
|---|---|---|---|---|--|------------|---|-----------------------------|--|---------------------------|---|--------------------------------|--|----------------------------|--|------------------------------|--|---------------------------|--|
| <b>Table 17: Rural areas residual housing requirement, as at 1 April <del>2019</del><b>2020</b></b>                                       | <b>District rural housing requirement 2011-31</b> |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |
| <b>JCS rural housing requirement 2011-31</b>  | <b>820</b>  |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |
| Rural housing completions 2011- <del>48</del> <b>19</b>   | <del>-467</del> <b>-513</b>                       |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |
| Rural housing completions 2018 <del>19</del> - <del>19</del> <b>20</b>  | <del>-46</del> <b>-65</b>                         |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |
| Extant planning permissions as at 1 April <del>2019</del> <b>2020</b> (as shown in <del>2019</del> <b>2020</b> AMR housing site schedule) | <del>-171</del><br><b>-124</b>                    |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |
| Local Plan/ Neighbourhood Plan site allocations (as at 1 April <del>2019</del> <b>2020</b> )  | <del>-90</del> <b>-136</b>                        |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |
| Emerging Neighbourhood Plan site allocations, other emerging rural sites (>4 dwellings), as at 1 April <del>2019</del> <b>2020</b>        | <del>-89</del><br><b>-58</b>                      |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |
| <b>RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL <del>2019</del><b>2020</b></b>  | <del>-43</del> <b>-76</b>                         |   |   |   |  |            |   |                             |  |                           |   |                                |  |                            |  |                              |  |                           |  |

<sup>15</sup> As at 1 April 2017 (**the latest available base date data when the first draft Plan was being prepared during 2018**) the residual requirement was for 294 dwellings, which formed the basis for the 300 dwellings requirement. This figure reduced to ~~246~~**239** dwellings for the latest (~~2019~~**2020**) monitoring data.

Schedule of proposed Main Modifications – March 2023

|      |             |     |   |                          |
|------|-------------|-----|---|--------------------------|
|      |             |     | <p><i>Amend paragraph 8.14 as follows:</i></p> <p>Table 17 demonstrates that the current Local Plan rural housing requirement for the district is already being met; indeed, exceeded by <del>43</del><b>76</b> dwellings. As specified in the Joint Core Strategy, further rural housing sites will continue to come forward through windfalls, infilling, Neighbourhood Plan allocations and rural exceptions schemes (Policy 11(2)). Further details about these outstanding requirements are set out in the <b>updated (2020)</b> rural housing Background Paper (BP10)<sup>16</sup>.</p> <p><i>Amend paragraph 8.15 as follows:</i></p> <p>The rural housing requirement is already delivered (<del>513</del><b>578</b> dwellings), committed (<del>261</del><b>260</b> dwellings); or allocations in Neighbourhood Plans “made” since 1 April <del>2019</del><b>2020</b> (<del>35</del> dwellings) and other emerging rural sites (<del>54</del><b>58</b> dwellings). Nevertheless, Neighbourhood Planning groups have sought indicative Ward or Parish level housing “targets”, to provide a basis for allocating future housing sites in a Neighbourhood Plan. This issue is addressed in the updated (<del>2019</del>) NPPF (<b>2021 update</b>), which states that strategic policies should also set out a housing requirement for designated neighbourhood areas (paragraph <del>65</del><b>66</b>) or, at the very least, provide an indicative figure if requested by the neighbourhood planning body (paragraph <del>66</del><b>67</b>).</p> |                          |
| MM49 | Policy EN24 | 138 | <p><i>Policy EN24 to be deleted in its entirety as follows:</i></p> <p><del>Policy EN24: Oundle Housing Allocations</del></p> <p><del>The following sites are allocated for housing development at Oundle as shown on the Policies Map and in the site specific maps under Policies EN25 to EN27:</del></p> <ul style="list-style-type: none"> <li><del>i) Land rear of Cemetery, Stoke Doyle Road ————— around 70 dwellings;</del></li> <li><del>ii) Cotterstock Road/ St Peter’s Road ————— around 130 dwellings; and</del></li> <li><del>iii) St Christopher’s Drive ————— around 100 dwellings.</del></li> </ul>  | Hearings Action Point 45 |

<sup>6</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12111/background\\_paper\\_10\\_-\\_housing\\_requirements\\_-\\_rural](https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10_-_housing_requirements_-_rural) [Link to updated BP10 to be added]

Schedule of proposed Main Modifications – March 2023

|      |                                |             |   |  |
|------|--------------------------------|-------------|---|--|
|      |                                |             | <p>Key considerations to be taken into account for each of the sites along with appropriate Local Plan policies are:</p> <ul style="list-style-type: none"> <li>a) transport impact – including vehicular access points, visibility, pedestrian and cycle links and impact on the existing road network;</li> <li>b) amenity – impact of existing uses and operations upon new development, including issues noise, odours and air quality;</li> <li>c) impact upon community infrastructure; e.g. schools and NHS services;</li> <li>d) impact on the surrounding landscape and street scene, to be addressed through site design, mix and layout;</li> <li>e) the management of water resources – flood risk, drainage, water supply and sewerage;</li> <li>f) impact on designated and non-designated heritage assets and their settings; and</li> <li>g) biodiversity impacts.</li> </ul>   |  |
| MM50 | Supporting text to Policy EN25 | 139 and 140 | <p><i>Add new text after paragraph 8.26, as follows:</i></p> <p><b><u>The site is located approximately 6.5km from the Upper Nene Valley Gravel Pits SPA, a specific wintering bird survey should therefore be undertaken for any planning application. The applicant will be required to provide evidence that the development will not result in a Likely Significant Effect. To achieve this, surveys will be required to determine habitats and current use of the site to determine if it does support a significant population<sup>17</sup> of qualifying species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat. Surveys should be required to be undertaken during autumn, winter and spring and at more than 1 year of surveys may be needed (to be agreed in consultation with the local planning authority and Natural England). If habitat within the site is identified to support significant populations of designated bird features avoidance measures and mitigation will be required, such as the creation of replacement habitat nearby, and the planning application will likely</u></b></p> | To address recommendations of the HRA. |

<sup>17</sup> A significant population is classified as a site that regularly used by more than 1% of the population of qualifying bird species

Schedule of proposed Main Modifications – March 2023

|      |                          |     |   |  |
|------|--------------------------|-----|---|--|
|      |                          |     | <b><u>need to be supported by a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity.</u></b>  |  |
| MM51 | Figure 14                | 140 | <p><i>Amend Figure 14 as follows:</i></p> <p>Text stating “longer term development potential” and accompanying arrow to be removed from Figure 14.</p>  | Hearings Action Point 41                           |
| MM52 | Policy EN25 Criterion b) | 140 | <p><i>Amend Policy 25 as follows:</i></p> <p><b><u>Site Specifics</u></b></p> <p>Land at Stoke Doyle Road, as shown on the Policies Map and indicated above, is allocated for 3.5 ha. It is expected that the proposed allocation will deliver around 70 houses. Development should be delivered in accordance with the criteria below.</p> <ul style="list-style-type: none"> <li>a) This site is owned by two separate landowners but should be subject to a scheme that allows comprehensive development of the site.</li> <li>b) It will be expected to provide a housing mix which includes provision for older persons, on site affordable housing provision and 5% of plots should be made available as serviced building plots for self and/ or custom housebuilding, <del>in line with other policy requirements.</del></li> <li>c) Upgrades to Stoke Doyle Road, including appropriate mitigation measures to address the impact of development upon the single track Warren Bridge, a significant heritage asset.</li> <li>d) Connections will be provided to the adjacent Public Rights of Way network, providing access to Benefield, Stoke Doyle and the town centre.</li> <li>e) Suitable structural landscaping will be provided to mitigate any potential adverse impacts of the development.</li> </ul> <p>The site will be required to set aside land to allow for an extension to Oundle Cemetery, as indicated in Figure 14 (above), in order to meet future requirements.</p> | Hearings Action Point 40                           |
| MM53 | Para 8.29                | 141 | <p><i>Amend paragraph 8.29 to delete the final sentence and replace with the following sentence:</i></p> <p><del>Therefore, it is necessary for this Plan to set a policy framework for managing the detailed development proposals.</del> <b>Detailed development proposals will need to address these</b></p>   | To address comments from Anglian Water (Rep 22/05) |



Schedule of proposed Main Modifications – March 2023

|      |             |     |  |  |
|------|-------------|-----|--|--|
|      |             |     | <p><b><u>matters and other site-specific constraints.</u></b></p> <p><i>And insert a new paragraph as follows:</i></p> <p><b><u>Notably, there is an existing foul sewer in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert existing asset may be required.</u></b></p>  |  |
| MM54 | Policy EN26 | 143 | <p><i>Amend Policy EN26 criterion d) as follows:</i></p> <p><b><u>Site Specifics</u></b></p> <p>Land at Cotterstock Road<sup>18</sup>, as shown on the Policies Map and indicated above, is allocated for 5.1 ha. It is expected that the proposed allocation will deliver around 130 houses. Development should be delivered in accordance with the criteria below.</p> <ul style="list-style-type: none"> <li>a) This site, which is within single ownership, will be expected to provide a housing mix which includes provision for older persons, on site affordable housing provision and 5% of plots should be made available as serviced building plots for self and/ or custom housebuilding, in line with other policy requirements.</li> <li>b) Enhanced connectivity; e.g. to the adjacent Public Rights of Way network, providing access to the Nene Valley and nearby villages (e.g. Cotterstock, Glapthorn and Tansor).</li> <li>c) Drainage will be managed by the provision of sustainable drainage systems (SuDS), including improvements to west/ east drainage capacity between Cotterstock Road and the River Nene to the east.</li> </ul> | To address comments from Anglian Water (Rep 22/03, 22/04, 22/06) |

<sup>18</sup> Approximately 50% of the gross site area (the northern part) is situated within Glapthorn Parish, although the whole site is regarded as meeting the strategic housing requirements for Oundle, comprising part of the Oundle urban area for the purposes of Local Plan monitoring

Schedule of proposed Main Modifications – March 2023

|      |             |     |  |  |
|------|-------------|-----|--|--|
|      |             |     | <p>d) Structural landscaping will be provided for the site boundary, to mitigate the impacts of smell or other pollution (e.g. from the sewage works to the north). <b><u>Dwellings and residential gardens should be located at a suitable distance from Oundle Water Recycling Centre to ensure that there is no unacceptable impact on residents and that any mitigation can be achieved without detriment to the continuous operation of Oundle Water Recycling Centre. Structural landscaping will also be provided for the site boundary, to mitigate the impacts of smell or other pollution (e.g. from the water recycling centre to the north).</u></b></p> <p>e) Net biodiversity gains will be sought, by way of on-site and/ or off-site provision. These may include measures such as enhanced management of existing local wildlife sites such as the nearby Snipe Meadows local wildlife site.</p> <p>f) <b><u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure.</u></b></p>   |  |
| MM55 | Policy EN27 | 145 | <p><i>Amend Policy EN27 as follows:</i></p> <p><b><u>Site Specifics</u></b></p> <p>Land at St Christopher’s Drive, as shown on the Policies Map and indicated above, is allocated for 3.9 ha. It is expected that the proposed allocation will deliver around 100 houses. Development should be delivered in accordance with the criteria below.</p> <p>a) This site, which is within single ownership, will be expected to provide a housing mix to meet identified local needs and 5% of plots should be made available as serviced building plots for self and/ or custom housebuilding, in line with other policy requirements.</p> <p>b) The site is well placed to deliver specialist housing, particularly <b><u>extra care provision to meet older persons’ needs</u></b>. Provision of such housing should be in lieu of the normal requirement for affordable housing; otherwise affordable housing should be delivered in accordance with normal policy requirements.</p> <p>c) The road layout should be delivered in accordance with the Local Highway Authority’s standards, supported by an appropriate Transport Assessment, with the main</p> | <p>To address comments from Anglian Water (Rep 22/07, 22/08)</p> <p>Hearings Action Point 73</p> <p>Hearings Action Point 43</p> |

Schedule of proposed Main Modifications – March 2023

|      |                    |         |  |   |
|------|--------------------|---------|--|---|
|      |                    |         | <p>vehicular access forming a continuation of St Christopher’s Drive. <del>Consideration may be given to the provision of an emergency access via Ashton Road.</del></p> <p>d) Connections will be provided to the adjacent Public Rights of Way network, providing access to the Nene Way and adjacent villages (e.g. Ashton, Barnwell and Polebrook).</p> <p>e) Structural landscaping will be provided for the site boundary, to mitigate the impacts of noise and other pollution from the A605.</p> <p>f) <b><u>The design and layout should consider the proximity of the foul pumping station<sup>19</sup>. to reduce the risk of nuisance/ loss of amenity associated with the operation of this.</u></b></p> <p><i>And add footnote:</i></p> <p><b><u>Anglian Water requires a minimum distance of 15 metres between the Oundle-Ashton Gate Terminal Pumping Station (OUNASM), which is located within the boundary of the allocation site, and the curtilage boundaries of the nearest dwellings</u></b></p> |   |
| MM56 | Paras 8.35 to 8.39 | 145-146 | <p><i>Amend paragraph 8.35 as follows:</i></p> <p>The trajectories for the major strategic sites (sustainable urban extensions) have been reviewed yearly, through subsequent Authorities’ Monitoring Reports (AMRs). Since adoption of the Joint Core Strategy (July 2016) the trajectories for Irthlingborough West and Rushden East have been substantially reviewed, in response to the latest deliverability evidence. The 2019<del>20</del> AMR<sup>20</sup>, indicates the following:</p> <ul style="list-style-type: none"> <li>• Irthlingborough West – <del>250</del><b>200</b> dwellings, 2026<del>7</del>-2031; and</li> <li>• Rushden East – 1,200<del>0</del><b>050</b> dwellings, 2022<del>3</del>-2031.</li> </ul> <p><i>Amend paragraph 8.36 as follows:</i></p>  | To update with 2020 monitoring information. |

<sup>19</sup> ***Anglian Water requires a minimum distance of 15 metres between the Oundle-Ashton Gate Terminal Pumping Station (OUNASM), which is located within the boundary of the allocation site, and the curtilage boundaries of the nearest dwellings.***

<sup>20</sup> <http://www.nnjpu.org.uk/publications/amr-2018-19-assessment-of-housing-land-supply-2019-24/> <http://www.nnjpu.org.uk/publications/north-northamptonshire-authorities-monitoring-report-19-20/>

Schedule of proposed Main Modifications – March 2023

|      |                                |         |   |  |
|------|--------------------------------|---------|---|--|
|      |                                |         | <p>The April 2019<del>20</del><sup>20</sup> trajectories for the two sustainable urban extensions equate to a combined reduction of <del>850</del><sup>1,050</sup> dwellings for Irthlingborough and Rushden within the Plan period. Predominantly this is due to development viability affecting housing delivery of these two sites; in particular costs associated with ground stability mitigation for Irthlingborough West arising from the former mine workings. The revised trajectories equate to residual shortfalls of <del>323</del><sup>375</sup> dwellings and <del>306</del><sup>406</sup> dwellings, for Irthlingborough and Rushden respectively.</p> <p><i>Amend the final sentence of paragraph 8.38 as follows:</i></p> <p>In other words, the Joint Core Strategy allows for the allocation of additional housing land to meet any outstanding residual requirements for Irthlingborough and Rushden (totalling <del>629</del><sup>781</sup> dwellings, as at 1 April 2019<del>20</del><sup>20</sup>).</p> <p><i>Amend paragraph 8.39 as follows:</i></p> <p>The combined shortfall for Irthlingborough and Rushden equates to greater than <del>500</del><sup>700</sup> dwellings. This <b>significantly</b> exceeds the definition of a “strategic” housing requirement (<b>500 dwellings</b>), as defined in the Joint Core Strategy (Figure 12: Key Diagram/ paragraph 9.14). However, regard should also be given to the housing land supply figures for Higham Ferrers, which currently exceed the Joint Core Strategy requirement by <del>244</del><sup>247</sup> dwellings (principally due to additional brownfield development opportunities within the urban area) <b>and Raunds which exceed the requirement by 84 dwellings</b>. If the Higham Ferrers <b>and Raunds</b> figures <del>is</del><sup>are</sup> applied to offset the Irthlingborough and Rushden shortfall, this would give a residual requirement for <del>385</del><sup>450</sup> dwellings across the <del>three</del><sup>four</sup> urban areas.)</p> |  |
| MM57 | Supporting text to Policy EN28 | 147-149 | <p><i>Add new text after paragraph 8.46, as follows:</i></p> <p><b><u>The site is located approximately 3.5km from the Upper Nene Valley Gravel Pits SPA, it is therefore possible it could constitute functionally linked habitat for the SPA. The applicant will be required to provide evidence that the development will not result in an adverse effect on the integrity of Upper Nene Valley Gravel Pits SPA/Ramsar. To achieve this, surveys will be required to determine habitats and current use of the site</u></b></p>  | To address recommendations of the HRA. |

Schedule of proposed Main Modifications – March 2023

|      |             |     |  |  |
|------|-------------|-----|--|--|
|      |             |     | <p><b><u>to determine if it does support a significant population<sup>21</sup> of qualifying species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat. Surveys should be required to be undertaken during autumn, winter and spring and more than 1 year of surveys may be needed (to be agreed in consultation with the local planning authority and Natural England). If habitat within the site is identified to support significant populations of designated bird features avoidance measures and mitigation will be required, such as the creation of replacement habitat nearby, and the planning application will likely need to be supported by a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity'</u></b></p>   |  |
| MM58 | Policy EN28 | 149 | <p><i>Amend Policy EN28 as follows:</i></p> <p>Land to the east of the A6/Bedford Road, Rushden, as shown on the Policies Map and indicated in Figure 17 above, is allocated for residential development together with associated supporting infrastructure, which should include a mix of ancillary retail, business or community uses to support the proposal.</p> <p>A design led masterplan is to be agreed by the local planning authority as part of the application process, which will address all relevant policy requirements. The key principles of the proposed development will deliver the following:</p> <ol style="list-style-type: none"> <li>a) <del>Up to</del> <b><u>It is expected that the proposed allocation will deliver around</u></b> 450 dwellings;</li> <li>b) A housing mix which includes provision for both specialist and older persons housing, and on-site affordable housing (meeting the target of 30% of the total number of dwellings provided within a Growth Town);</li> <li>c) Vehicular access to be provided directly from the Bedford Road/ A6 Bypass roundabout, with the proposals informed by a Transport Assessment subject to approval by the Highway Authority;</li> <li>d) To maximise opportunities to improve connectivity to, and enhance the quality of, the public rights of way network; in particular:</li> </ol> | To address comments from Bellway Homes (Rep 26/05) |

<sup>21</sup> A significant population is classified as a site that regularly used by more than 1% of the population of qualifying bird species

Schedule of proposed Main Modifications – March 2023

|      |             |     |   |                                  |
|------|-------------|-----|---|----------------------------------|
|      |             |     | <ul style="list-style-type: none"> <li>• providing pedestrian and cycle connections to the surrounding urban area, and to adjacent sports and recreational facilities;</li> <li>• improving local bus connections serving the site;</li> <li>• delivering enhancements <del>and net biodiversity gain</del> to the Rushden – Souldrop local green infrastructure corridor and net biodiversity gain; and</li> <li>• delivering facilities to assist the sustainability of the allocation, in particular by supporting the creation of a community hub to enhance the relocation of the sports facilities, to be located on the eastern edge of the site boundary.</li> </ul> <p>e) Appropriate mitigation measures, to avoid significant adverse impacts upon the integrity of the Upper Nene Gravel Pits Special Protection Area;</p> <p>f) Provision of a landmark feature at the main access point, adjacent to the A6 / Bedford Road roundabout; and</p> <p>g) Appropriate multi-functional structural landscaping to service the development, including sustainable drainage systems (SuDS) and suitable features along the western boundary to provide the necessary mitigation for noise and air pollution arising from the A6 Bypass.</p> |                                  |
| MM59 | Policy EN29 | 150 | <p><i>Amend Policy EN29 as follows:</i></p> <p>To help meet current and future needs for housing for people with disabilities, all new housing developments <b><u>of 20 or more dwellings</u></b> should include a <b><u>target minimum</u></b> of 5% Category 3 (wheelchair accessible <b><u>or adaptable</u></b>) housing. <b><u>Wheelchair accessible housing will only be required for dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.</u></b></p>   | Hearings Action Point 63, 64, 66 |
| MM60 | Policy EN30 | 153 | <p><i>Amend Policy EN30 as follows:</i></p> <p>All housing developments will be expected to provide a suitable mix and range of housing, including a range of size, type and tenure (as set out in Policy 30 of the Joint Core Strategy) that recognise the local need and demand in both the market and affordable housing sectors,</p>  | Hearings Action Point 67         |

Schedule of proposed Main Modifications – March 2023

|      |                                |     |   |   |
|------|--------------------------------|-----|---|---|
|      |                                |     | <p>unless viability testing shows otherwise. <b><u>Evidence should be provided to support the proposed housing mix.</u></b></p> <p>In particular consideration will be given to:</p> <ol style="list-style-type: none"> <li>a) Meeting the needs of an ageing population by providing the opportunity for smaller properties to encourage downsizing within the district;</li> <li>b) Recognising the potential to increase the proportion of higher value, larger properties in areas where local evidence identifies a lack of opportunity for higher income earners to acquire such properties; and</li> <li>c) Increasing the numbers of smaller dwellings in the rural areas to meet the needs for starter homes, affordable housing and downsizing.</li> </ol>  |   |
| MM61 | Supporting text to Policy EN31 | 156 | <p><i>Add new supporting text at the end of paragraph 8.71 as follows:</i></p> <p><b><u>This could include:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Accommodation to enable downsizing such as bungalows, apartments and other smaller homes which are available to meet general needs but are particularly suitable to encourage and facilitate older people to move from larger family housing to smaller properties</u></b></li> <li>• <b><u>Retirement Housing which will include also bungalows as well as other high quality homes which may be ‘age restricted’ to provide for older persons. The accommodation can be provided as individual homes or as part of a retirement housing scheme and may include communal facilities and on-site management.</u></b></li> <li>• <b><u>Extra Care housing providing independent accommodation with 24 hour care and support available on site.</u></b></li> <li>• <b><u>Residential and Nursing Care Homes</u></b></li> </ul> |   |
| MM62 | Policy EN31                    | 157 | <p><i>Amend Policy EN31 as follows:</i></p> <p>To help meet future requirements for retirement housing for older people, the Local Planning Authority will seek to ensure that a proportion of its overall housing provision will address the identified needs of the ageing population within the district <b><u>unless it can be justified that</u></b></p>   | Hearings<br>Action Point 68, 69,<br>70, 71,72 |

Schedule of proposed Main Modifications – March 2023

|  |  |  |   |
|--|--|--|---|
|  |  | <p><b><u>such provision is not appropriate for the location or would have an adverse impact upon the deliverability and/or viability of the scheme.</u></b></p> <p>To address the identified need and where there is access to local facilities and public transport services, larger sites will be required to provide for the needs of older households.</p> <p>Larger sites will be expected to deliver a minimum of 10% of housing for older people.</p> <p>For Sustainable Urban Extensions (SUEs), specialist housing requirements will be agreed with the Local Planning Authority through the preparation of a Masterplan Development Framework or a Strategic Masterplan. Elsewhere, due to the rural nature of the district, and to prevent the loss of opportunities to provide accommodation for older people, a threshold hierarchy will be applied so that, in respect of older people’s housing, other larger sites will be classified as:</p> <ul style="list-style-type: none"> <li>• 50 or more dwellings in the towns of Rushden, Higham Ferrers, Irthlingborough and Raunds</li> <li>• 25 or more dwellings in the towns of Oundle and Thrapston; or</li> <li>• As opportunities for development in the villages are limited, and sites are often small scale in nature, all developments of 5 or more dwellings will be expected to deliver <b><u>a minimum of 20%</u></b> of housing for older people, <b><u>unless evidence justifies a departure.</u></b></li> </ul> <p>The criteria for site selection and design principles will also need to meet the requirements laid out in Appendix 35, although these will be relaxed in the villages in recognition of the difficulties in meeting them.</p> <p>The type of housing provision required for older people will vary according to the scale and location of the development and will include:</p> <ol style="list-style-type: none"> <li>a) <b>Downsizing</b> – Accommodation such as bungalows, apartments and other smaller homes <del>which are available to meet general needs but are particularly suitable to encourage and facilitate older people to move from larger family housing to smaller properties</del></li> <li>b) <b>Retirement Housing</b> will include bungalows and other high quality homes which may be ‘age restricted’ to older people. <del>They can be provided as individual homes or as</del></li> </ol> | <p>To address comments from Bellway Homes (Rep 26/08)</p> |
|--|--|--|---|



## Schedule of proposed Main Modifications – March 2023

|  |  |  |  |  |
|--|--|--|--|--|
|  |  |  | <p><del>part of a retirement housing scheme and may include communal facilities and on-site management.</del></p> <p><b>c) Supported Housing for Older People – Extra Care:</b></p> <p>i. <u>SUEs and Strategic Sites</u></p> <p>Mixed tenure Extra Care Housing <del>providing independent accommodation with 24 hour care and support available on-site</del> should be provided on major strategic housing sites at Rushden East and Irthlingborough West. Masterplan Framework Documents for these developments should ensure such provision through the safeguarding of suitable sites and the setting out of design principles for delivery. Further consideration needs to be given to whether a future Extra Care Scheme or a retirement village would be sustainable at Tresham Garden Village once the necessary infrastructure, transport and local facilities are in place.</p> <p>ii. <u>Allocated sites</u></p> <ul style="list-style-type: none"> <li>• St Christopher’s Drive, Oundle (EN27), and Hayway, Northampton Road, Rushden<sup>22</sup> will, subject to viability, be supported to deliver specific Extra Care provision</li> <li>• East of Ferrers School, Higham Ferrers<sup>23</sup> this site could also provide an opportunity to deliver a mixed tenure Extra Care scheme, subject to achieving suitable connectivity of the site to the town.</li> </ul> <p>iii. <u>Windfall sites</u></p> <p>In addition to the strategic sites listed in this policy, the Council will encourage the provision of Extra Care accommodation in sustainable locations across the district, particularly within the designated growth and market towns.</p> <p><b>d) Residential and Nursing Care Homes</b></p> <p>Where the need for care homes has been identified, and is supported by Social Care and Health, these will be encouraged on strategic, allocated and windfall sites.</p> |  |
|--|--|--|--|--|

<sup>22</sup> Rushden Neighbourhood Plan Policy H2F

<sup>23</sup> Higham Ferrers Neighbourhood Plan Policy HF.H4

**Schedule of proposed Main Modifications – March 2023**

|      |             |         |  |   |
|------|-------------|---------|--|---|
| MM63 | Policy EN32 | 161-162 | <p><i>Amend Policy EN32 as follows:</i></p> <p>New build developments will make provision for the delivery of serviced plots for self and custom build housing in suitable locations, where proposals are in compliance with other plan policies.</p> <p><b>a) <u>Self-build housing</u></b></p> <p>Proposals for self-build housing developments on infill or other windfall development sites within urban areas, freestanding villages or ribbon developments will be supported where these fulfil the requirements of relevant design and place-shaping policies. To be regarded as a self-build housing plot, a site should:</p> <ul style="list-style-type: none"> <li>i) Provide for a single unit net increase change of use, conversion or new build, or alternatively a replacement dwelling;</li> <li>ii) Allow for access to a highway; and</li> <li>iii) Allow for sufficient opportunities to provide electricity, water and wastewater connections, or make adequate alternative arrangements.</li> </ul> <p><b>b) <u>Custom build housing</u></b></p> <p>On sites of 50 or more dwellings, 5% of the plots should be made available on site as serviced custom build plots. These serviced plots should be offered for sale for custom (or self) build for a minimum of <del>42</del><b>6</b> months, after which these may be released for general market housing as part of the consented scheme. To be regarded as a custom build housing plot, a site should:</p> <ul style="list-style-type: none"> <li>i) Include servicing, as part of the overall physical infrastructure obligations for the development as a whole;</li> <li>ii) Be clearly identified and offered for sale for custom (or self) build for a minimum of <del>42</del><b>6</b> months; and</li> <li>iii) Be situated in order to provide opportunities for enhancement of the local distinctiveness of the development site in accordance with the relevant design and place shaping policies.</li> </ul> | Hearings Action Point 76 and Post Hearings Letter |
|------|-------------|---------|--|---|

Schedule of proposed Main Modifications – March 2023

|  |                             |         | <p><b><u>On sites of less than 50 dwellings provision of custom build housing will be supported, including sites which are solely custom build sites, provided they comply with the spatial development strategy.</u></b></p> <p>Detailed guidance and direction regarding delivery mechanisms for self and custom build housing will be provided through a supplementary planning document.</p>   |  |  |  |   |   |    |   |   |              |           |  |
|--|-----------------------------|---------|--|--|--|--|---|---|----|---|---|--------------|-----------|--|
| MM64   | Table 21, paras 8.96 – 8.97 | 163-164 | <p><i>Amend paragraph 8.93 as follows:</i></p> <p><del>The 2019 GTAA estimates that across North Northamptonshire around 25% of traveller households definitely fulfil the planning definition, with a significant number of households being undetermined (i.e. insufficient information). At a district level, the GTAA identified 73 possible Gypsy and Traveller households, of which all but 6 are undetermined. Additionally, a further 4 Travelling Showpeople households were identified that meet the national definition.</del></p> <p><b><u>The GTAA (2019) identified no gypsy and traveller households who met the planning definition, 67 undetermined households who may meet the planning definition and 6 households who did not meet the planning definition. Four travelling showpeople households were identified who met the planning definition.</u></b></p> <p><i>Amend table 21 as follows:</i></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2" style="text-align: center;"><b>Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033</b></th> </tr> </thead> <tbody> <tr> <td>No. of identified households in need that meet the planning definition</td> <td style="text-align: center;">4</td> </tr> <tr> <td>No. of undetermined households in need that may/ may not meet planning definition</td> <td style="text-align: center;">17</td> </tr> <tr> <td>No. of identified households in need that do not meet the planning definition</td> <td style="text-align: center;">7</td> </tr> <tr> <td><b>TOTAL</b></td> <td style="text-align: center;"><b>28</b></td> </tr> </tbody> </table> | <b>Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033</b> |  | No. of identified households in need that meet the planning definition | 4 | No. of undetermined households in need that may/ may not meet planning definition | 17 | No. of identified households in need that do not meet the planning definition | 7 | <b>TOTAL</b> | <b>28</b> | Factual correction and update in response to the Inspector's Initial Question IQ5. |
| <b>Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033</b> |                             |         |  |  |  |  |   |   |    |   |   |              |           |  |
| No. of identified households in need that meet the planning definition                                       | 4                           |         |  |  |  |  |   |   |    |   |   |              |           |  |
| No. of undetermined households in need that may/ may not meet planning definition                            | 17                          |         |  |  |  |  |   |   |    |   |   |              |           |  |
| No. of identified households in need that do not meet the planning definition                                | 7                           |         |  |  |  |  |   |   |    |   |   |              |           |  |
| <b>TOTAL</b>   | <b>28</b>                   |         |  |  |  |  |   |   |    |   |   |              |           |  |

Schedule of proposed Main Modifications – March 2023

**Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeople accommodation 2018-2033**

| <b>Status</b>                          | <b>Identified need 2018-31</b> | <b>Identified need 2031-2033</b> |
|--|--------------------------------|----------------------------------|
| <b>Gypsies and Travellers</b>          |                                |                                  |
| <b>Meet Planning Definition</b>        | <b>0</b>                       | <b>0</b>                         |
| <b>Undetermined</b>                    | <b>14</b>                      | <b>3</b>                         |
| <b>Do not meet Planning Definition</b> | <b>11</b>                      | <b>0</b>                         |
| <b>Travelling Showpeople</b>           |                                |                                  |
| <b>Meet Planning Definition</b>        | <b>6</b>                       | <b>0</b>                         |
| <b>Undetermined</b>                    | <b>0</b>                       | <b>0</b>                         |
| <b>Do not meet Planning Definition</b> | <b>0</b>                       | <b>0</b>                         |

*Amend paragraph 8.95 – 8.96 as follows:*

The GTAA identifies a potential need to provide additional accommodation (pitches) for Gypsy, Traveller or Travelling Showpeople for the remainder of the current Plan period. However, the definite need (i.e. those households for which Policy 31 of the Joint Core Strategy should be applied) is minimal (just 4 households).

If undetermined households are assumed to fulfil the planning definition, the number of households identified as being in need rises to 21. The GTAA update recognises that meeting accommodation needs is more complicated than simply setting a requirement to deliver 4 (or 21) pitches by the end of the Plan period. In the cases of private sites (there are no public sites within the district); residual needs could be met at existing established sites (Irthlingborough and Ringstead).

**The GTAA identifies a need for 0 pitches for gypsy and traveller households who meet the planning definition and a need for 17 pitches for undetermined households. The GTAA estimated that applying national averages of households who meet the definition the undetermined need could result in a need for 4 pitches. Policy 31 of the JCS provides a criteria-based policy for addressing needs from undetermined households who subsequently demonstrate that they meet the planning definition.**

Schedule of proposed Main Modifications – March 2023

|  |  |  |  |  |  |
|--|--|--|--|--|--|
|  |  |  | <p><b><u>The GTAA identifies a need for 6 plots for travelling showpeople households who meet the planning definition. The North Northamptonshire Gypsy and Traveller Site Allocation Policy DPD will include policies and allocations to meet need arising from households who met the planning definition across North Northamptonshire, the need for Travelling Showpeople plots will therefore be addressed through the preparation of this document.</u></b></p> <p><i>Amend paragraph 8.98 as follows:</i></p> <p>Overall, the residual requirements for additional <b><u>gypsy and traveller</u></b> pitches are minimal and <b><u>relate to undetermined need which can be met using criteria based policies, therefore</u></b><del>the scale of need is such that</del> there is no need to allocate further sites in the Plan to fulfil <del>the outstanding</del> requirements. If future proposals are forthcoming, Policy 31 of the Joint Core Strategy provides a clear steer for assessing any such future planning applications that may arise. <b><u>The need for travelling showpeople plots will be addressed through the North Northamptonshire Gypsy and Traveller Site Allocation Policy which will address need for gypsy, traveller and travelling showpeople accommodation across North Northamptonshire.</u></b></p> |  |  |
|--|--|--|--|--|--|

Delivering Sustainable Urban Extensions

|      |                |         |  |   |
|------|----------------|---------|--|---|
| MM65 | Para 9.1 – 9.7 | 165-166 | <p><i>Amend paragraph 9.1 as follows:</i></p> <p>The Joint Core Strategy (Annex A), made provision for the delivery of 2,300 dwellings (27% of the total requirement for 8,400 dwellings) and accompanying jobs, facilities and services at the two Sustainable Urban Extensions (SUEs) within the District during the Plan period. Trajectories for SUEs in subsequent Authorities’ Monitoring Reports (2017 , 2018 <del>and</del>, 2019<sup>24</sup> <b><u>and 2020</u></b>) have seen the anticipated delivery at these progressively diminishing; such that as at 1 April 2019 <del>2020</del> it is currently forecast that just <b><u>1,250</u></b> dwellings would come forward at the two sites by 2031 (<b><u>17.15</u></b>% of the total requirement). Table 22 below provides a</p> | To update with 2020 monitoring information. |
|------|----------------|---------|--|---|

<sup>24</sup> <http://www.nnjpu.org.uk/publications/amr-2018-19-assessment-of-housing-land-supply-2019-24/>

Schedule of proposed Main Modifications – March 2023

|                             |                           | <p>comparison between the 2016 (Joint Core Strategy adoption) and <del>2019</del><b>2020</b> (latest Authorities' Monitoring Report) positions.</p> <p><i>Amend table 22 as follows:</i></p> <table border="1"> <thead> <tr> <th colspan="2">Table 22</th> <th colspan="2">Anticipated delivery by 2031</th> </tr> <tr> <th>Sustainable Urban Extension</th> <th>Relevant Policy reference</th> <th>Joint Core Strategy (JCS), Annex A (base date, 1 April 2016)</th> <th><del>2019</del> <b>2020</b> Authorities Monitoring Report (base date, 1 April <del>2019</del><b>2020</b>)</th> </tr> </thead> <tbody> <tr> <td>Rushden East</td> <td>JCS Policy 33</td> <td>1,600</td> <td><del>1,200</del><b>1,050</b></td> </tr> <tr> <td>Irthlingborough West</td> <td>JCS Annex A</td> <td>700</td> <td><del>250</del> <b>200</b></td> </tr> <tr> <td><b>TOTAL</b></td> <td></td> <td><b>2,300</b></td> <td><del>1,450</del><b>1,250</b></td> </tr> </tbody> </table> <p><i>Amend paragraph 9.4 as follows:</i></p> <p>The Joint Core Strategy (Policy 33) provides a comprehensive framework for delivering the principal strategic development proposals to the east of Rushden. This Sustainable Urban Extension is anticipated to be delivered over the duration of the next 20 years. Of this, <del>1,200</del><b>1,050</b> (out of up to 2,700 dwellings) are currently anticipated to come forward by 2031.</p> <p><i>Amend paragraph 9.5 as follows:</i></p> <p>Joint Core Strategy Policy 33 anticipated that the detailed development proposals should be supported by an agreed development masterplan, which would guide the development of Rushden East (<b>also known as High Hayden Garden Community</b>) through the Local Plan Part 2 or a planning application (Joint Core Strategy, paragraph 10.31), whichever comes forward first. The draft Masterplan Framework was published for consultation during February/ March 2020. and this, in its latest iteration, is incorporated into the Local Plan Part 2 (Appendix 6). <b><u>This emphasises that the Rushden East/ High Hayden Sustainable Urban Extension should be delivered in accordance with the Government's Garden Communities principles.</u></b></p> | Table 22  |  | Anticipated delivery by 2031 |  | Sustainable Urban Extension | Relevant Policy reference | Joint Core Strategy (JCS), Annex A (base date, 1 April 2016) | <del>2019</del> <b>2020</b> Authorities Monitoring Report (base date, 1 April <del>2019</del> <b>2020</b> ) | Rushden East | JCS Policy 33 | 1,600 | <del>1,200</del> <b>1,050</b> | Irthlingborough West | JCS Annex A | 700 | <del>250</del> <b>200</b> | <b>TOTAL</b> |  | <b>2,300</b> | <del>1,450</del> <b>1,250</b> |  |
|-----------------------------|---------------------------|--|---|--|------------------------------|--|-----------------------------|---------------------------|--|---|--------------|---------------|-------|-------------------------------|----------------------|-------------|-----|---------------------------|--------------|--|--------------|-------------------------------|--|
| Table 22                    |                           | Anticipated delivery by 2031   |   |  |                              |  |                             |                           |  |   |              |               |       |                               |                      |             |     |                           |              |  |              |                               |  |
| Sustainable Urban Extension | Relevant Policy reference | Joint Core Strategy (JCS), Annex A (base date, 1 April 2016)   | <del>2019</del> <b>2020</b> Authorities Monitoring Report (base date, 1 April <del>2019</del> <b>2020</b> ) |  |                              |  |                             |                           |  |   |              |               |       |                               |                      |             |     |                           |              |  |              |                               |  |
| Rushden East                | JCS Policy 33             | 1,600  | <del>1,200</del> <b>1,050</b>   |  |                              |  |                             |                           |  |   |              |               |       |                               |                      |             |     |                           |              |  |              |                               |  |
| Irthlingborough West        | JCS Annex A               | 700  | <del>250</del> <b>200</b>   |  |                              |  |                             |                           |  |   |              |               |       |                               |                      |             |     |                           |              |  |              |                               |  |
| <b>TOTAL</b>                |                           | <b>2,300</b>   | <del>1,450</del> <b>1,250</b>   |  |                              |  |                             |                           |  |   |              |               |       |                               |                      |             |     |                           |              |  |              |                               |  |

Schedule of proposed Main Modifications – March 2023

|      |             |         |   |  |
|------|-------------|---------|---|--|
|      |             |         | <p><i>Add new paragraph after paragraph 9.7:</i></p> <p><b><u>A draft Masterplan Framework Document has been endorsed by the Council and was published in February 2021. This document will be taken forward as a supplementary planning document supporting Policy EN33. Policy EN33 sets out the settlement boundaries together with the main delivery principles required for the Rushden East Sustainable Urban Extension.</u></b></p>  |  |
| MM66 | Policy EN33 | 168-169 | <p><i>Amend Policy EN33 as follows:</i></p> <p>In order to meet the requirements of Policy 33 of the adopted Joint Core Strategy the area shown on the local plan policies map, and defined in figure 18 below, <b><u>above</u></b> identifies the development boundaries for the delivery of the Rushden East Sustainable Urban Extension (SUE). This <b><u>development, also known as High Hayden Garden Community</u></b>, constitutes a mixed use development, where land is allocated for up to 2,700 dwellings, a mix of retail, community facilities, employment development and open space, including a <b><u>two</u></b> new primary schools, (and land reserved for a secondary school), a town park, allotments, sports facilities, a cemetery, and Suitable Alternative Natural Green Space and associated infrastructure.</p> <p><del>Figure 18 (above) expands upon the policy guidance for Rushden East, provided in the Joint Core Strategy and the broad location for the Sustainable Urban Extension (as shown in figure 23 of the Joint Core Strategy).</del></p> <p>Policy 33 of the adopted Joint Core Strategy requires a masterplan to be prepared to define the policy expectations for the development of the SUE. The Masterplan Framework Document (MFD) <del>forms part of the Local Plan and it is set out as an appendix to that document.</del> provides a spatial development context for the delivery of the site. This is designed to inform future planning applications and proposals for development will be granted planning permission where they are consistent with the relevant policy expectations and guidance set out in the MFD. The MFD accords with the adopted Joint Core Strategy Policy 33 to <b><u>site to inform future planning applications and will ensure a comprehensive approach to site delivery</u></b>. <del>forms part of the Local Plan and is set out as an appendix to that document.</del> The MFD provides a spatial development context for the delivery of the site. This is designed to inform future planning applications <b><u>Planning applications will be required to be broadly consistent with the MFD and the principles of the Government’s Garden Communities initiative.</u></b></p> |  |

Schedule of proposed Main Modifications – March 2023

|  |  |   |  |
|--|--|---|--|
|  |  | <p>Proposals for development will be granted planning permission where they are consistent with the relevant policy expectations and guidance set out in the MFD <u>listed below. Further detailed guidance and illustration on how these policy expectations might be met is set out in the MFD.</u> The MFD accords with the adopted Joint Core Strategy Policy 33 to ensure a comprehensive approach to site delivery.</p> <p><b><u>Economic:</u></b></p> <ol style="list-style-type: none"> <li>1. <b><u>Ensuring the delivery of the employment land, located on the northern part of the site, that aims to achieve parity between rates of new housing occupations and job creation, as set out in Joint Core Strategy Policy 33 criterion c.</u></b></li> <li>2. <b><u>Providing opportunities for small-businesses and those driving enterprise and innovation.</u></b></li> <li>3. <b><u>Provision of two local neighbourhood centres, incorporating 2 primary schools and land reserved for a secondary school, local shops, health facilities, community uses and employment space to be provided in the broad locations shown on Figures 2.3 and 2.38 in the MFD, along with a programme for delivery relative to the phased delivery of housing.</u></b></li> <li>4. <b><u>Provide clear evidence that connections for all users can be facilitated between development parcels within the SUE and further demonstrate that connections to adjacent land beyond the SUE boundaries are not prejudiced by the proposed development of the SUE. This includes the recognition of the opportunity to transform the character of the A6, whilst seeking to deliver options which are practical and deliverable.</u></b></li> <li>5. <b><u>Crossings of the A6 at the John Clark and Newton Way Roundabouts and to Hayden Road, Rushden, are designed to incorporate the following key principles:</u></b> <ul style="list-style-type: none"> <li>• <b><u>Traffic signals provided to control vehicular traffic and allow for safe pedestrian and cycle movement;</u></b></li> </ul> </li> </ol> |  |
|--|--|---|--|



Schedule of proposed Main Modifications – March 2023

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <ul style="list-style-type: none"> <li>• <u>Crossings at-grade to ensure maximum accessibility for pedestrians and cyclists;</u></li> <li>• <u>Change in surface material to ensure that user priority is clear and that the crossing is legible for pedestrians, cyclists and drivers;</u></li> <li>• <u>Minimum pedestrian crossing width of 8m to allow comfortable and safe movement for pedestrians.</u></li> </ul> <p>6. <u>Provision of a Primary tier ‘loop’ Street through the SUE (to accommodate a service bus route) connecting the John Clark Way roundabout in the north with the Newton Road roundabout in the south and via the two neighbourhood local centres.</u></p> <p>7. <u>Provision of a Secondary tier Street connecting with the Primary Street at the northern and southern ends of the SUE and the Hayden Road crossing and green corridor link in the centre.</u></p> <p>8. <u>Provision of a hierarchy of streets and a legible and accessible network of dedicated footpaths and cycle paths.</u></p> <p>9. <u>Provision of a central green corridor link through the SUE to Hayden Road in broad accordance with the location shown on Figure 2.2 of the MFD and incorporating a dedicated footpath and cycle path, as well as formal tree planting.</u></p> <p>10. <u>Provision of high quality, attractive and safe off-site connections for non-motorised and motorised users (including improvements to existing, as well as providing opportunities for new, bridge connections) between the SUE and the towns of Rushden and Higham Ferrers, and to the villages of Caldecott, Chelveston and Newton Bromswold.</u></p> <p>11. <u>Provision for legal agreements to ensure infrastructure provided by one developer is shared, on an equitable basis, with all developers reliant upon that</u></p> |  |
|--|--|--|---|--|

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <p><u>infrastructure to deliver their parts of the SUE, to ensure a comprehensive development of the SUE.</u></p> <p><u>Environmental:</u></p> <p>12. <u>Provide a sensitively designed environment incorporating:</u></p> <ul style="list-style-type: none"> <li>• <u>A network of green corridors and public open spaces, including a central green corridor, within and around the SUE, and landscaped edges in line with Figure 2.2 of the MFD.</u></li> <li>• <u>A comprehensive enhancement of the A6 corridor between the John Clark Way and the Newton Road, including the provision of a planting strip with additional landscaping to safeguard the future widening of the A6. Built development would be expected to either front or be located side-onto the A6 corridor.</u></li> <li>• <u>The retention of existing hedgerows and provision of formal street tree planting, particularly on higher order streets.</u></li> <li>• <u>Appropriate environmental and landscape measures to be incorporated into the design and construction of any proposals for large scale distribution units to ensure they are properly mitigated.</u></li> <li>• <u>Sensitive landscape treatment of the aircraft crash site.</u></li> <li>• <u>Environmental improvements on the approaches to the A6 bridge, including the surfacing and gradient of the footway, provision of lighting, along with improvements to the structure itself.</u></li> <li>• <u>An urban form that responds to the wider context and character of Rushden.</u></li> <li>• <u>A range of development with higher densities focussed around the two local centres.</u></li> </ul> |  |
|--|--|--|---|--|

Schedule of proposed Main Modifications – March 2023

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <ul style="list-style-type: none"> <li>• <u>Suitable Alternative Natural Greenspace (SANG) of approximately 21 hectares, supported by a Habitats Regulations Assessment</u></li> <li>• <u>A Sustainable Urban Drainage System.</u></li> <li>• <u>High standards of resource and energy efficiency, and reduction in carbon emissions in accordance with the requirements of Policies 9 and 33 of the Adopted Joint Core Strategy.</u></li> <li>• <u>Viewing corridors of the spire of the Grade I listed Church of St Mary’s Higham Ferrers into the detailed design and masterplanning of the SUE</u></li> <li>• <u>The preparation and agreement of Design Codes to guide planning applications for the SUE.</u></li> <li>• <u>A design brief, which will be prepared for the grey land to ensure a cohesive approach to development.</u></li> </ul> <p><b><u>Social:</u></b></p> <ol style="list-style-type: none"> <li>13. <u>Provision of a new Town Park (of approximately 3.6ha).</u></li> <li>14. <u>Provision of formal, and informal open space, and sports pitches (including ancillary facilities) in accordance with MFD Figure 2.4.and guidance contained in the Council’s KKP Open space and Playing Pitch Strategy 2017</u></li> <li>15. <u>Provision of a Cemetery (approximately 2ha) with access, parking and relevant supporting infrastructure in line with MFD Figure 2.2.</u></li> <li>16. <u>Provision of allotments in the northern and southern neighbourhoods (approximately 2.20ha) in line with MFD Figure 2.2.</u></li> <li>17. <u>Prepare and agree a delivery strategy (including onward adoption and management arrangements) for all education, energy, drainage, community, social, health infrastructure, SANG provision and associated public realm (including off-site and on-site roads, cycle routes and paths).</u></li> </ol> |  |
|--|--|--|---|--|

## Schedule of proposed Main Modifications – March 2023

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <p><b>18. <u>Provision of a mix of dwelling types, sizes and tenures (including specialist housing provision and home working/larger homes) to accord with housing policies EN29-EN32, and policy 30 of the Adopted Joint Core Strategy, together with relevant Neighbourhood Plan policies.</u></b></p> <p>The SUE will be developed as a sustainable place providing a range of opportunities and services that support meeting local needs on a daily basis. The development proposal will need to ensure it can demonstrate good integration within the wider setting taking into account both the natural and built environment. It will maximise sustainable travel connections and provide convenient and attractive cycle and pedestrian connections so that the proposed development is integrated with the existing communities, facilities and services in the town centres of Rushden and Higham Ferrers.</p> <p>However, in accordance with the policy objectives for the “grey land” within the SUE, (as shown in figure 2.1 of the MFD) to deliver a “bespoke residential character”, the Council will bring forward detailed design guidance through a Supplementary Planning Document</p> <p>The infrastructure requirements for the proposed SUE are to be provided for through planning conditions and/or planning obligations following the principles of fairness and proportionality. To ensure all parts of the SUE make an appropriate contribution towards the SUE infrastructure it is expected that collaboration will be sought as part of S106 planning obligations.</p> |  |
|--|--|--|---|--|

### Town Centre Strategies

|      |             |     |   |                                |
|------|-------------|-----|---|--------------------------------|
| MM67 | Para 10.10  | 174 | <p><i>Amend paragraph 10.10, 2<sup>nd</sup> sentence as follows:</i></p> <p>Policy EN34 sets out a framework for assessing development opportunities within <del>and around</del> the <b>wider</b> town centres, as and when these arise.</p> | Hearings Action Point 109, 110 |
| MM68 | Policy EN34 | 174 | <p><i>Amend Policy EN34 as follows:</i></p>   |                                |

Schedule of proposed Main Modifications – March 2023

|  |                        |   |  |  |                        |   |  |
|--|------------------------|---|--|--|------------------------|---|--|
|  |                        |   | <p>Development proposals for <b>the town centres: Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston</b> sites should seek to increase local community interaction, by increasing footfall to sustain and enhance vitality and viability. The Council will work proactively with stakeholders where opportunities arise within the identified Growth and Market Towns to secure the following outcomes:</p> <ul style="list-style-type: none"> <li>a) Maintain a mixture of uses that attract visitors and encourage greater social interaction, including both economic, social and, in some circumstances, residential, uses;</li> <li>b) Consolidate and improve the retail offer of the town centres, by way of enhancements to identified active frontages;</li> <li>c) Improve the leisure and cultural offer of each town to provide for the growth of both day and nighttime - economies;</li> <li>d) Seek to Implement high quality public realm improvements, including the development of new landmark features, within town centres especially addressing gateway sites, as identified in town strategies or neighbourhood plans;</li> <li>e) Seek enhancements to pedestrian connectivity both within town centres, and to residential and employment areas beyond; and</li> <li>f) Encouraging a step change in the quality of urban design, providing sustainable development with a focus on low carbon energy solutions, through measures including green initiatives such as urban tree planting.</li> </ul> <p>Development opportunities will be informed by the preparation of town strategies, with site specific details set out through development briefs.</p> |  |                        |   |  |
| MM69   | Table 24               | 176                                       | <p><i>Remove third column of Table 24 as follows:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><b>Spatial parts of Rushden and Higham Ferrers</b></td> <td style="width: 33%; text-align: center;"><b>Characteristics</b></td> <td style="width: 33%; text-align: center;"><b>Relevant spatial strategy policies</b></td> </tr> </table>  | <b>Spatial parts of Rushden and Higham Ferrers</b> | <b>Characteristics</b> | <b>Relevant spatial strategy policies</b> |  |
| <b>Spatial parts of Rushden and Higham Ferrers</b> | <b>Characteristics</b> | <b>Relevant spatial strategy policies</b> |  |  |                        |   |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |                                |  |  |  |  |  |
|--|--|--|--------------------------------|--|--|--|--|--|
|  |  |  | Core urban area                | <ul style="list-style-type: none"> <li>Defined by radial routes – Higham Road/ High Street/ Bedford Road (north-south) and John Clark Way/ Newton Road/ Wellingborough Road (east-west)</li> <li>Based around Victorian terraced roads, with former Boot and Shoe factory sites, with post-war suburban development to the south</li> <li>Distribution centre to east of town centre, off John Clark Way (Spire Road) constructed late 2000s</li> <li>Includes key services and facilities – town centre, leisure centres (Pemberton Centre/ Splash Pool), schools</li> <li>Character defined main public open spaces – Rushden Hall Park, Spencer Park</li> </ul> | Policy EN1(1) (a); JCS Policy 11(1)(a) |  |  |  |
|  |  |  | Rushden West (employment area) | <ul style="list-style-type: none"> <li>Main employment area of Rushden</li> <li>Longstanding industrial area, has grown in a piecemeal way over a long period</li> <li>Includes environmentally challenging businesses e.g. Monoworld, Sander’s Lodge (waste treatment)</li> <li>Incorporates Rushden Lakes and Rushden Gateway – main new employment sites</li> <li>Includes enhanced visitor access to Nene Valley, via Rushden Lakes</li> </ul>   | Policy EN1(1) (a); JCS Policy 11(1)(a) |  |  |  |

Schedule of proposed Main Modifications – March 2023

|      |             |     |   |  |  |                                     |
|------|-------------|-----|---|--|--|-------------------------------------|
|      |             |     | <p>Rushden East (Sustainable Urban Extension)</p> <ul style="list-style-type: none"> <li>Proposed strategic urban extension to east of A6 Bypass</li> <li>Requires new east-west connections across A6</li> <li>Development will include new community infrastructure; e.g. schools, neighbourhood centre</li> <li>Development will be supported by strategic green infrastructure</li> </ul>   | <p>Policy EN1(1) (a);<br/>JCS Policy 33</p>                  |  |                                     |
|      |             |     | <p>Avenue Road/ Bedford Road/ Newton Road</p> <ul style="list-style-type: none"> <li>Ribbon development, connecting Newton Road, Avenue Road and Bedford Road</li> <li>Suburban character</li> <li>Includes a mix of rural businesses (e.g. stables) and more urban uses (e.g. care homes)</li> </ul>   | <p>JCS Policy 11(2) (a)<br/>Neighbourhood Plan Policy H4</p> |  |                                     |
|      |             |     | <p>Higham Ferrers</p> <ul style="list-style-type: none"> <li>Self-contained urban area, enclosed by Rushden (south), A6 Bypass (east) and A45 Bypass (west)</li> <li>Historic market town – includes many heritage assets e.g. Chichele College, Castle</li> <li>Main employment area to the east of the town (south of Kimbolton Road)</li> <li>Individual character areas are defined in the Higham Ferrers Neighbourhood Plan</li> </ul> | <p>Policy EN1(1) (a);<br/>JCS Policy 11(1)(b)</p>            |  |                                     |
| MM70 | Policy EN35 | 180 | Amend Policy EN35 as follows:   |  |  | Hearings Action Point 113, 114, 115 |

Schedule of proposed Main Modifications – March 2023

|      |                             |         |  |   |
|------|-----------------------------|---------|--|---|
|      |                             |         | <p>Redevelopment proposals for the Splash Pool and Wilkinson sites together with the associated highways network, as shown <u>as an area of opportunity in figure 21 above.</u> <del>on the Policies Map</del> should deliver increased footfall and enhanced vitality and viability for the town centre.</p> <p><b><u>The redevelopment would comprise ‘town centre uses’ to consolidate and improve the town centre retail offering, improve the leisure and cultural offering to encourage the growth of both day and night-time economies and offer ‘above the shop’ residential opportunities.</u></b></p> <p>Whilst it is envisaged that redevelopment of this key centre site could be delivered in phases, the two main components (Wilkinsons and the Splash Pool) should be informed by a comprehensive development brief, which takes into account the following principles:</p> <ul style="list-style-type: none"> <li>a) The creation of a pedestrian link between the High Street and the shops on Eaton Walk;</li> <li>b) The development of a new public square located between the High Street and Eaton Walk;</li> <li>c) Providing improvements to the public realm to create a distinct quarter;</li> <li>d) The reconfiguration and enhancement of public car parking provision to improve the connection to the High Street primary shopping area;</li> <li>e) <b><u>The preservation and enhancement of the heritage assets on the site, in accordance with a heritage impact assessment;</u></b></li> <li>f) <b><u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure;</u></b></li> <li>g) e) In addition to the above, the redevelopment of the Splash Pool leisure site will be required to address the loss of the facility <b><u>by providing an equivalent replacement facility</u></b> and the Council will aim to undertake a built sports facilities strategy to inform future opportunities for its relocation as well as bringing forward the regeneration of this key town centre site.</li> </ul> | <p>To address comments from Historic England (SOCG) (e) (Rep 39/08) and Anglian Water (f) (Rep 22/13)</p> |
| MM71 | Policy EN36 supporting text | 181-182 | <p><i>Add new text after para 10.25 to form a new para as follows:</i></p> <p><b><u>Financial contributions to mitigate the adverse impacts of development upon the SPA/Ramsar site will be sought in accordance with the Addendum to the SPA</u></b></p>  | <p>To address recommendations of the HRA.</p>   |



Schedule of proposed Main Modifications – March 2023

|      |             |     |  |  |
|------|-------------|-----|--|--|
|      |             |     | <b><u>Supplementary Planning Document: Mitigation Strategy. In line with the SPD requirements, consultation is required by Natural England in advance of submitting any planning application. As part of that consultation, further mitigation may be needed in exceptional circumstances and where Natural England advise. If a bespoke process is required, then a project level Appropriate Assessment will be required to accompany any planning application.</u></b>  |  |
| MM72 | Para 10.30  | 183 | <p><i>Add new text after paragraph 10.30, as follows:</i></p> <p><b><u>Financial contributions to mitigate the adverse impacts of development upon the SPA/Ramsar site will be sought in accordance with the Addendum to the SPA Supplementary Planning Document: Mitigation Strategy. In line with the SPD requirements, consultation is required by Natural England in advance of submitting any planning application. As part of that consultation, further mitigation may be needed in exceptional circumstances and where Natural England advise. If a bespoke process is required, then a project level Appropriate Assessment will be required to accompany any planning application.</u></b></p>                                       | To address recommendations of the HRA.   |
| MM73 | Policy EN37 | 184 | <p><i>Amend Policy EN37 as follows:</i></p> <p>Redevelopment of the Rectory Business Centre site, as shown on the Policies Map, will be supported for residential development, for approximately 35 dwellings. Redevelopment proposals will be informed by a comprehensive masterplan and should deliver:</p> <ul style="list-style-type: none"> <li>a) A mix of housing types and tenures to meet local needs, consisting of predominantly small and medium sized properties;</li> <li>b) Improved vehicular access and parking arrangements, upgrading the Albert Road and Victoria Road junctions with Rectory Road;</li> <li>c) Enhancements to the public realm, especially the streetscapes of Albert Road and Victoria Road;</li> </ul> | To address comments from Historic England (SOCG) (f) (Rep 39/09) and Anglian Water (g) (Rep 22/17) |

Schedule of proposed Main Modifications – March 2023

|                      |  |   |   |  |  |                          |
|----------------------|--|---|---|--|--|--------------------------|
|                      |  |   | <p>d) Improved east-west pedestrian and cycle connectivity between the town centre and residential areas to the east, including appropriate crossing arrangements along Rectory Road; and</p> <p>e) <del>Appropriate development contributions for education and training, to offset the loss of longstanding business premises;</del></p> <p><b>f) <u>The preservation and enhancement of the heritage assets on the site, in accordance with a heritage impact assessment and</u></b></p> <p><b>g) <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure</u></b></p> |  |  |                          |
| MM74                 | Table 25<br>After<br>Para<br>10.42   | 189   | Amend Table 25 as follows:  |  |  | Hearings<br>Action Point |
|                      |  |   | <b>Spatial parts of Irthlingborough</b>   | <b>Characteristics</b>   | <b>Relevant spatial strategy policies</b>                  |                          |
|                      |  |   | Core urban area (existing)  | <ul style="list-style-type: none"> <li>South of the A6, defined by main arterial routes – Finedon Road, Station Road, Wellingborough Road</li> <li>Includes key services and facilities – town centre, schools</li> <li>Hosts main employer – Whitworth</li> </ul> | <del>Policy EN1 (1) (b): JCS Policy 11(1) (b)</del>        |                          |
|                      |  |   | Irthlingborough West (Sustainable Urban Extension)  | <ul style="list-style-type: none"> <li>Permitted major extension to main urban area</li> <li>Will enable new Finedon Road (A6) and Wellingborough Road connections</li> </ul>  | <del>Policy EN1 (1) (b) JCS Policy 11(1) (b)/Annex A</del> |                          |
| Irthlingborough East | <ul style="list-style-type: none"> <li>Former principal employment and leisure hub</li> <li>Separated from main urban area by A6 Bypass</li> </ul> | <del>Policy EN1 (1) (b): JCS Policy 11(1) (b)</del> |   |  |  |                          |

Schedule of proposed Main Modifications – March 2023

|      |             |     |   |  |   |
|------|-------------|-----|---|--|---|
|      |             |     | <ul style="list-style-type: none"> <li>Two main elements – Nene Park (former Rushden &amp; Diamonds FC stadium, south of Diamond Way/ Marsh Lane) and Nene Business Park (mixed use redevelopment site, north of Diamond Way/ Marsh Lane)</li> <li>Mixed use developments at Nene Business Park site (Attley Way) currently under construction – new food/ convenience retailing, housing</li> </ul>  |  |   |
|      |             |     | <p>Crow Hill (lower)</p> <ul style="list-style-type: none"> <li>Ribbon development along Addington Road</li> <li>Separated from main urban area by A6 Bypass</li> <li>Characteristically suburban, but with rural elements e.g. Bypass Farm/ butchers</li> </ul>  | <p><del>Policy EN4:</del><br/>JCS Policy 11(2) (a)</p>         |   |
|      |             |     | <p>Crow Hill (upper)</p> <ul style="list-style-type: none"> <li>Secondary/ smaller part of Irthlingborough, with urban character</li> <li>Separated from main urban area by A6 Bypass and some agricultural fields</li> <li>Addington Road provides main arterial route</li> <li>Includes some local services, facilities and businesses – convenience store, community centre, Frontier Centre</li> </ul>  | <p><del>Policy EN1</del><br/>(1) (b): JCS Policy 11(1) (b)</p> |   |
| MM75 | Policy EN39 | 192 | <p><i>Amend Policy EN39 as follows:</i></p> <p>The vacant Select &amp; Save and St Peter’s Way Car Park site, as shown on the Policies Map, is allocated for redevelopment, proposals should deliver:</p> <ol style="list-style-type: none"> <li>A balance and mix of main town centre uses, including convenience and comparison retailing, financial services and/ or food and drink businesses;</li> <li>Enhancements to the High Street primary shopping frontage;</li> </ol> |  | <p>To address comments from Historic England (SOCG) (Rep 39/10)</p> |

Schedule of proposed Main Modifications – March 2023

|      |                                |     |  |   |
|------|--------------------------------|-----|--|---|
|      |                                |     | <ul style="list-style-type: none"> <li>c) Pedestrian connections between the High Street, St Peter’s Way and St Peter’s Church;</li> <li>d) Provision for suitable service arrangements for the new business premises;</li> <li>e) Sufficient public car parking;</li> <li>f) Opportunities for live-work units at first floor level or above; and</li> <li>g) <del>Enhancements</del> <b>Preservation and enhancement</b> to the settings of the heritage assets, with particular reference to St Peter’s Church and the Louisa Lilley Almshouses”</li> </ul>   |   |
| MM76 | Supporting text to Policy EN40 | 194 | <p><i>Amend paragraph 10.52 as follows:</i></p> <p>The Former Rushden and Diamonds FC Stadium (site 3, Nene Park), was demolished in 2017. <b><u>The site was identified as a lapsed site in the Playing Pitch Strategy and Action Plan (PPS) (October 2016). The PPS identified that the site contained three poor quality adult pitches. The PPS recommended that opportunities to bring the site back into use were explored to meet identified shortfalls. However, if this is not feasible or sustainable or disposal is inevitable then the PPS sets out that requirements of NPPF paragraph 99 must be met. The PPS states that this requires replacement provision of an equivalent or better quantity and quality within boundaries of Irthlingborough.</u></b> The loss of the stadium, <b><u>playing pitches and ancillary facilities</u></b> requires suitable mitigation (i.e. alternative provision, unless it can be demonstrated that the <b><u>facilities are</u></b> stadium site is surplus to requirements), in accordance with NPPF paragraph 97<b><u>9. Account should also be taken of the findings of any subsequent Playing Pitch Strategy.</u></b></p> <p>Replacement leisure facilities are anticipated to be developed in accordance with the Healthy and Active Lifestyles Strategy through the masterplans for the major strategic sustainable urban extensions.</p> <p><i>Add new text after paragraph 10.54 as follows:</i></p> <p><b><u>The site is located adjacent to the SPA, a site specific HRA is therefore required. The HRA should assess all potential impacts including impacts on surrounding Functionally Linked Land, development proposals should include a Construction Environmental Management Plan and an Access Management Plan which includes</u></b></p> | <p>Request for Note after Hearings resulting in text change (AP 118)</p> <p>To address rep by Sport England</p> <p>To address comments from Natural England (Rep 48/08)</p> |

Schedule of proposed Main Modifications – March 2023

|      |             |     |   |  |
|------|-------------|-----|---|--|
|      |             |     | <p><b><u>details regarding the use of moorings. SuDS will need to be incorporated as part of any redevelopment. Flood risk will need to be fully considered and appropriate mitigation measures delivered, proposals will also need to consider the build-up of contaminants. The impact of climate change over the plan period will need to inform future proposals for the site.</u></b></p>  |  |
| MM77 | Policy EN40 | 194 | <p><i>Amend Policy EN40, as follows:</i></p> <p>The former Rushden and Diamonds FC Stadium site, as shown on the Policies Map, is allocated for employment use, with an emphasis on business leisure and tourism use. Proposals should deliver:</p> <ul style="list-style-type: none"> <li>a) Flood compatible employment use such as tourism, cultural or leisure related development in accordance with the current EA flood zone status, complementing the nearby offers of Irthlingborough, Higham Ferrers and Rushden town centres, and Rushden lakes;</li> <li>b) Appropriate flood risk mitigation measures</li> <li>c) Measures to enhance biodiversity, deliver ecosystem services and ensure that any development does not have a significant adverse impact upon the adjacent SPA/Ramsar site. <b><u>A site-specific Habitat Regulations Assessment should be provided;</u></b></li> <li>d) Suitable access and highways arrangements to enable the site to be served by public transport;</li> <li>e) Improved arrangements for pedestrians and cyclists crossing the A6 to Station Road and accessing the town centre (east)</li> <li>f) Pedestrian and cycle connections to East Northamptonshire Greenway, via the Old Bridge and Marsh Lane (west)</li> </ul> |  |

Schedule of proposed Main Modifications – March 2023

|                         |   |  | <p>g) <b>Design, height and massing together with protecting</b> the setting of nearby heritage assets, such as Irthlingborough Bridge and Crow Hill Iron Age Fort and non-designated heritage assets, <del>and</del></p> <p>h) Provision for new moorings along the River Nene Navigation allowing direct riparian access, <b>and</b></p> <p>i) <b>Mitigate for the loss of the stadium, playing pitches and ancillary facilities, unless it can be demonstrated that the facilities are surplus to requirements in line with paragraph 99 of the NPPF</b></p>   | <p>To address comments from Historic England (SOCG Rep 39/11)</p> <p>To address rep by Sport England</p> |  |  |                         |                 |                                    |               |   |  |   |
|-------------------------|---|--|---|--|--|--|-------------------------|-----------------|------------------------------------|---------------|---|--|---|
| MM78                    | Para 10.57  | 195                                    | <p><i>Amend paragraph 10.57 as follows:</i></p> <p>Oundle and its surrounding rural hinterland consist of four distinctive spatial parts, plus the closely connected villages of Ashton, <b>Barnwell</b>, Cotterstock, Glaphorn and Stoke Doyle. Figure 28 and Table 26 (below) outline the main characteristics of each, with the relevant spatial strategy policy references. <b><u>The Oundle built up area includes parts that are situated within the parishes of Ashton (Elmington; Laxton Drive), Barnwell (Barnwell Mill; Barnwell Country Park; Oundle Marina) and Glaphorn (Old Farm Lane) parishes.</u></b></p>                      | To address comments made by Oundle Town Council (Rep 25/05)  |  |  |                         |                 |                                    |               |   |  |   |
| MM79                    | Table 26 After Para 10.57   | 196                                    | <p><i>Amend Table 26 as follows:</i></p> <table border="1"> <thead> <tr> <th colspan="3">Table 26</th> </tr> <tr> <th>Spatial parts of Oundle</th> <th>Characteristics</th> <th>Relevant spatial strategy policies</th> </tr> </thead> <tbody> <tr> <td>Historic core</td> <td> <ul style="list-style-type: none"> <li>Defined by West Street and North Street; <b><u>the Market Place which links them and New Street</u></b> (A427)</li> <li>Includes key services and facilities – town centre</li> <li>Historic character defined by Oundle School</li> </ul> </td> <td>Policy EN4 (1)(c); JCS Policy 11(1)(b)</td> </tr> </tbody> </table> | Table 26   |  |  | Spatial parts of Oundle | Characteristics | Relevant spatial strategy policies | Historic core | <ul style="list-style-type: none"> <li>Defined by West Street and North Street; <b><u>the Market Place which links them and New Street</u></b> (A427)</li> <li>Includes key services and facilities – town centre</li> <li>Historic character defined by Oundle School</li> </ul> | Policy EN4 (1)(c); JCS Policy 11(1)(b) | <p>To address comments made by Oundle Town Council (Rep 25/08)</p> <p>Hearings Action Point</p> |
| Table 26                |   |  |   |  |  |  |                         |                 |                                    |               |   |  |   |
| Spatial parts of Oundle | Characteristics   | Relevant spatial strategy policies     |   |  |  |  |                         |                 |                                    |               |   |  |   |
| Historic core           | <ul style="list-style-type: none"> <li>Defined by West Street and North Street; <b><u>the Market Place which links them and New Street</u></b> (A427)</li> <li>Includes key services and facilities – town centre</li> <li>Historic character defined by Oundle School</li> </ul> | Policy EN4 (1)(c); JCS Policy 11(1)(b) |   |  |  |  |                         |                 |                                    |               |   |  |   |

Schedule of proposed Main Modifications – March 2023

|      |            |     |  |   |  |                             |
|------|------------|-----|--|---|--|-----------------------------|
|      |            |     |  | <ul style="list-style-type: none"> <li>• <b><u>Hosts main employment areas – Main employment areas situated to the east of the historic core of the town</u></b> - Nene Business Park/ Fairline Boats; East Road</li> </ul>   |  |                             |
|      |            |     | Oundle north                             | <ul style="list-style-type: none"> <li>• Suburban urban extension, north of New Road, focused upon arterial Glaphorn Road/ Cotterstock Road</li> <li>• Developed since 1950s</li> <li>• Focal points – Oundle Primary School, Occupation Road playing fields</li> <li>• Potential for expansion of urban area to the north (Oundle/ Glaphorn Parish), but recognise concerns regarding potential coalescence with Glaphorn</li> </ul> | Policy EN1 (1)(c); JCS Policy 11(1)(b) |                             |
|      |            |     | Oundle Marina/ Barnwell Country Park     | <ul style="list-style-type: none"> <li>• Significant tourism and leisure hub</li> <li>• Separated from main urban area by River Nene</li> <li>• Majority of area is functional floodplain</li> <li>• Committed redevelopment proposal – Oundle Marina</li> <li>• Further opportunities e.g. Barnwell Mill</li> </ul>  | Policy EN1 (3)(a); JCS Policy 11(2)(a) |                             |
|      |            |     | Elmington/ Laxton Drive (Ashton Parish)  | <ul style="list-style-type: none"> <li>• Ribbon development along A605</li> <li>• Separated from main urban area by A605 Bypass</li> <li>• Suburban element (Laxton Drive)</li> <li>• Riverside Hotel presents redevelopment challenge</li> </ul>   | Policy EN1 (3)(a); JCS Policy 11(2)(a) |                             |
| MM80 | Para 10.60 | 198 | <i>Amend paragraph 10.60 as follows:</i> |   |  | To address comments made by |

Schedule of proposed Main Modifications – March 2023

|      |              |     |   |  |
|------|--------------|-----|---|--|
|      | and<br>10.61 |     | <p>Planning permission for the change of use of the former Recycling Centre and Council car park at Herne Park to a mixture of office, light industry and storage was granted in 2014. <b><u>The former recycling centre and car park adjacent to the Joan Strong Centre has undergone some changes in recent years.</u></b> The former recycling centre was occupied by North Equipment Ltd in 2016, while the adjacent Herne Park car park is well used on most working days, particularly market days.</p> <p><i>Amend paragraph 10.61 as follows:</i></p> <p>While both the <b><u>The</u></b> recycling centre and former Council car park could provide development opportunities, <del>neither site</del> <b><u>are brownfield urban sites, but neither</u></b> is currently available. Both are brownfield sites, situated within the urban area. Future development proposals <b><u>If either site becomes available in the longer term, any potential redevelopment scheme</u></b> would <b><u>could</u></b> be informed by <b><u>a development brief, alongside</u></b> other Local Plan policies, including the spatial strategy (Policy EN1(1)(c) and Joint Core Strategy Policy 11(1)(b)), together with other relevant development management policies (e.g. Joint Core Strategy Policy 6 - Development on Brownfield Land). Future development proposals could be supported through site specific development briefs. <b><u>In the short/ medium term, Oundle Town Council has taken over the lease of the East Road/ Herne Park car park and is keen to retain this as an asset for the town.</u></b></p> | Oundle Town Council (Rep 25/9 & 25/10) |
| MM81 | Policy EN41  | 200 | <p><i>Amend Policy EN41 as follows:</i></p> <p>Redevelopment proposals for the former Riverside Hotel, as allocated on the Policies Map, will be supported for the following uses:</p> <ul style="list-style-type: none"> <li>• Reinstatement as a restaurant, public house, hotel or tourist accommodation;</li> <li>• Training facility and/ or resource centre; or</li> <li>• Small business units, or other potential service employment uses.</li> </ul> <p>Redevelopment schemes should deliver the following outcomes:</p> <p>a) Retention <b><u>Preservation</u></b> and enhancement of the heritage asset;</p>   | Hearings Action Point 120              |



Schedule of proposed Main Modifications – March 2023

|                         |   |                                       | <p>b) Appropriate flood mitigation measures, including appropriate access and egress arrangements;</p> <p>c) Provision for new moorings along the River Nene Navigation with direct riparian access; and</p> <p>d) Improved connectivity for pedestrian and cyclists, to the town centre (east, via North Bridge) and riverside paths.</p>  |          |  |  |                         |                 |                                    |                 |   |                                       |              |  |                                       |                          |
|-------------------------|---|---------------------------------------|---|----------|--|--|-------------------------|-----------------|------------------------------------|-----------------|---|---------------------------------------|--------------|--|---------------------------------------|--------------------------|
| MM82                    | Table 27<br>After<br>Para<br>10.68  | 202                                   | <table border="1"> <thead> <tr> <th colspan="3">Table 27</th> </tr> <tr> <th>Spatial parts of Raunds</th> <th>Characteristics</th> <th>Relevant Spatial strategy policies</th> </tr> </thead> <tbody> <tr> <td>Core urban area</td> <td> <ul style="list-style-type: none"> <li>Defined by London Road (west), Brick Kiln Road (north) and High Street/ Brook Street</li> <li>Includes key services and facilities – linear town centre, focused on The Square/ Brook Street</li> <li>Historic character defined by St Peter’s Church</li> <li>Hosts significant suburban areas to the east and west of High Street/ Brook Street</li> </ul> </td> <td>Policy EN1(1)(b); JCS Policy 11(1)(b)</td> </tr> <tr> <td>Raunds north</td> <td> <ul style="list-style-type: none"> <li>Sustainable urban extension to the north of Brick Kiln Road (also known as Border Park)</li> <li>Developed since 2013</li> <li>Focal points – Raunds Town FC, new London Road/ Michael Way local centre/ service hub adjacent to A45</li> <li>Potential for further expansion of urban area to the east of Border Park</li> </ul> </td> <td>Policy EN1(1)(b); JCS Policy 11(1)(b)</td> </tr> </tbody> </table> | Table 27 |  |  | Spatial parts of Raunds | Characteristics | Relevant Spatial strategy policies | Core urban area | <ul style="list-style-type: none"> <li>Defined by London Road (west), Brick Kiln Road (north) and High Street/ Brook Street</li> <li>Includes key services and facilities – linear town centre, focused on The Square/ Brook Street</li> <li>Historic character defined by St Peter’s Church</li> <li>Hosts significant suburban areas to the east and west of High Street/ Brook Street</li> </ul> | Policy EN1(1)(b); JCS Policy 11(1)(b) | Raunds north | <ul style="list-style-type: none"> <li>Sustainable urban extension to the north of Brick Kiln Road (also known as Border Park)</li> <li>Developed since 2013</li> <li>Focal points – Raunds Town FC, new London Road/ Michael Way local centre/ service hub adjacent to A45</li> <li>Potential for further expansion of urban area to the east of Border Park</li> </ul> | Policy EN1(1)(b); JCS Policy 11(1)(b) | Hearings<br>Action Point |
| Table 27                |   |                                       |   |          |  |  |                         |                 |                                    |                 |   |                                       |              |  |                                       |                          |
| Spatial parts of Raunds | Characteristics   | Relevant Spatial strategy policies    |   |          |  |  |                         |                 |                                    |                 |   |                                       |              |  |                                       |                          |
| Core urban area         | <ul style="list-style-type: none"> <li>Defined by London Road (west), Brick Kiln Road (north) and High Street/ Brook Street</li> <li>Includes key services and facilities – linear town centre, focused on The Square/ Brook Street</li> <li>Historic character defined by St Peter’s Church</li> <li>Hosts significant suburban areas to the east and west of High Street/ Brook Street</li> </ul> | Policy EN1(1)(b); JCS Policy 11(1)(b) |   |          |  |  |                         |                 |                                    |                 |   |                                       |              |  |                                       |                          |
| Raunds north            | <ul style="list-style-type: none"> <li>Sustainable urban extension to the north of Brick Kiln Road (also known as Border Park)</li> <li>Developed since 2013</li> <li>Focal points – Raunds Town FC, new London Road/ Michael Way local centre/ service hub adjacent to A45</li> <li>Potential for further expansion of urban area to the east of Border Park</li> </ul>                            | Policy EN1(1)(b); JCS Policy 11(1)(b) |   |          |  |  |                         |                 |                                    |                 |   |                                       |              |  |                                       |                          |

Schedule of proposed Main Modifications – March 2023

|      |                           |     |   |  |   |                       |
|------|---------------------------|-----|---|--|---|-----------------------|
|      |                           |     | Raunds north east                           | <ul style="list-style-type: none"> <li>Sustainable urban extension to north east of existing urban area, known as Northdale End</li> <li>Significant new green infrastructure corridor adjacent to Brooks Road, utilising Hog Dyke</li> </ul>  | Policy EN1(1)(b); JCS Policy 11(1)(b)     |                       |
|      |                           |     | Raunds south                                | <ul style="list-style-type: none"> <li>Sustainable urban extension to the south of the town</li> <li>Two significant developments to south of Grove Street – Weighbridge Way (developed during 2000s) and Willow Way (2010/11)</li> <li>Major development at Darcy Park (also known as Darsdale Farm) recently started, including significant new public open space</li> </ul> | Policy EN1(1)(b); JCS Policy 11(1)(b)     |                       |
|      |                           |     | Warth Park (west of Raunds)                 | <ul style="list-style-type: none"> <li>Main employment area of Raunds</li> <li>Major strategic warehousing and distribution site</li> <li>Also includes significant new green infrastructure between warehouses and A45</li> </ul>   | Policy EN1(1)(b); JCS Policy 11(1)(b)     |                       |
|      |                           |     | Brooks Road                                 | <ul style="list-style-type: none"> <li>Ribbon development along Brooks Road, beyond Northdale End</li> <li>Suburban character</li> <li>Transition between urban (Northdale End) and rural (Brook Farm Livery Stables)</li> </ul>   | Policy EN1(3)(a); JCS Policy 11(2)(a)     |                       |
| MM83 | Table 28 After Para 10.72 | 204 | <i>Amend Table 28 as follows:</i>           |  |   | Hearings Action Point |
|      |                           |     | <b>Spatial parts of Thrapston and Islip</b> | <b>Characteristics</b>   | <b>Relevant spatial strategy policies</b> |                       |
|      |                           |     | Core urban area                             | <ul style="list-style-type: none"> <li>Defined by radial arterial roads – High Street/ Huntingdon Road, Midland Road and Oundle Road</li> <li>Historic core based around High Street/</li> </ul>   | Policy EN1(1)(b); JCS Policy 11(1)(b)     |                       |

Schedule of proposed Main Modifications – March 2023

|      |            |         |   |   |  |   |
|------|------------|---------|---|---|--|---|
|      |            |         | <p>Huntingdon Road and Midland Road, with post-war suburban development to the north (Oundle Road, Lazy Acre)</p> <ul style="list-style-type: none"> <li>Includes key services and facilities – town centre retailing, school, main public open spaces, leisure centre</li> </ul> |   |  |   |
|      |            |         | <p>Haldens Parkway (employment area)</p>  | <ul style="list-style-type: none"> <li>Main employment area of Thrapston, east of A605</li> <li>Major strategic warehousing and distribution site, with access to A14 and A45 Trunk Roads</li> <li>Scope for further expansion of logistics or warehousing businesses, if necessary</li> </ul>  | <p>Policy EN1(1)(b);<br/>JCS Policy 11(1)(b)</p>                 |   |
|      |            |         | <p>Islip village</p>  | <ul style="list-style-type: none"> <li>Self-contained village, with a range of services but a close functional relationship with Thrapston</li> <li>Linear village, defined by Lowick Road, High Street and Chapel Hill/ Toll Bar Road</li> </ul>   | <p>Policy EN1(2)(b);<br/>JCS Policy 11(2)(a)</p>                 |   |
|      |            |         | <p>Islip south</p>  | <ul style="list-style-type: none"> <li>Linear area, west of River Nene, situated between Kettering Road and A14</li> <li>Major strategic employment site, including Islip Furnace and Primark premises</li> <li>Linear/ ribbon development part of Islip village to the south of Kettering Road, separated from Islip village by cricket field/ Woolpack pub</li> </ul> | <p>Policy EN1(2)(b) &amp; EN1(3)(a);<br/>JCS Policy 11(2)(a)</p> |   |
| MM84 | Para 10.83 | 207-208 | <p>Add new text after paragraph 10.83, as follows:</p>  |   |  | <p>To address recommendations of the HRA.</p> |

## Schedule of proposed Main Modifications – March 2023

|      |             |     |  |  |
|------|-------------|-----|--|--|
|      |             |     | <b><u>The site is located approximately 500m from the SPA, depending on the type of development proposed a Habitat Regulations Assessment may be required to accompany any planning application.</u></b>   |  |
| MM85 | Policy EN42 | 209 | <p><i>Amend Policy EN42, as follows:</i></p> <p>The Cattle Market site, as shown on the Policies Map, is allocated for redevelopment, with a focus upon maintaining an appropriate mix and range of uses compatible with the town centre. Redevelopment proposals should deliver:</p> <ul style="list-style-type: none"> <li>a) A balance and mix of town centre uses, including convenience retailing, financial services and/ or food and drink businesses;</li> <li>b) Opening up of a new north-south active town centre frontage to the south of the High Street;</li> <li>c) Enhanced north-south pedestrian connectivity, between the High Street, Market Road, Grove Road and the Leisure Centre (Cedar Drive);</li> <li>d) Vehicular access from Market Road, with off-site improvements to the Midland Road junction, and provision for suitable service arrangements for the new business premises;</li> <li>e) Opportunities for residential uses appropriate for a town centre site, including live-work units or specialist housing at first floor level or above;</li> <li>f) <del>Enhancements</del> <b><u>Preservation and enhancement</u></b> to the settings of adjacent heritage assets, <b><u>non-designated heritage assets</u></b> and the Conservation Area; and</li> <li>g) Additional town centre public car parking.</li> </ul> | To address comments from Historic England (SOCG) (Rep 39/12) |

Page 512

## Monitoring and Implementation

|      |           |     |  |                                 |
|------|-----------|-----|--|---------------------------------|
| MM86 | Para 11.4 | 210 | <p><i>Amend paragraph 11.4 (including amending bullet point 3 and introducing a new bullet point after bullet point 3)) as follows:</i></p> <p>The topic and area-based workshops for the Plan (2017-18) and subsequent draft Plan consultation (November 2018 - February 2019) <b><u>and subsequent Regulation 19 draft</u></b></p> | Northamptonshire County Council |
|------|-----------|-----|--|---------------------------------|

## Schedule of proposed Main Modifications – March 2023

|  |  |   |  |
|--|--|---|--|
|  |  | <p><b>submission Plan consultation (2019)</b> identified various localised infrastructure priorities, over and above the strategic projects <b>as identified</b> above:</p> <p><i>Bullet point 3:</i></p> <ul style="list-style-type: none"> <li>Education - delivery of new academies/ free schools, working with the Department for Education, <b><u>in accordance with current local education authority<sup>25</sup> and national<sup>26</sup> policies.</u></b></li> </ul> <p><i>New bullet point:</i></p> <ul style="list-style-type: none"> <li><b><u>Fire and rescue - depending on the scale and nature of the proposed development and resulting demands on fire and rescue resources, delivery of new types of fleet (e.g. smaller ‘rapid response’ initial intervention vehicles)/ new bays to existing fire stations to accommodate additional vehicles/relocation or provision of new response facilities/ introduction of new types of equipment and a reduction of risk and demand through the provision of fire suppression systems (sprinklers) in appropriate developments;</u></b></li> </ul> | (Development Infrastructure)<br>(Rep 49/04, 49/10) |
|--|--|---|--|

<sup>25</sup> NCC School Organisation Plan 2016-21: [https://www3.northamptonshire.gov.uk/councilservices/children-families-education/schools-andeducation/school-admissions/Documents/School%20Organisation%20Plan%202016-2021\\_2017%20Update.pdf](https://www3.northamptonshire.gov.uk/councilservices/children-families-education/schools-andeducation/school-admissions/Documents/School%20Organisation%20Plan%202016-2021_2017%20Update.pdf)

Planning for Schools Development (2011):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6316/1966097.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf)

Northamptonshire Organisation Plan for School Places 2018 – 2023:

[https://www.whatdotheyknow.com/request/670920/response/1598950/attach/4/2018%20Update%20School%20Organisation%20Plan%20DRAFT%20v2.pdf?cookie\\_passthrough=1](https://www.whatdotheyknow.com/request/670920/response/1598950/attach/4/2018%20Update%20School%20Organisation%20Plan%20DRAFT%20v2.pdf?cookie_passthrough=1)

<sup>26</sup> Planning for Schools Development (2011):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6316/1966097.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf)

Securing developer contributions for Education (November 2019):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/909908/Developer\\_Contributions\\_Guidance\\_update\\_Nov2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909908/Developer_Contributions_Guidance_update_Nov2019.pdf)

Schedule of proposed Main Modifications – March 2023

| MM87   | Table 29   | 214 to 219  | <p><i>Amend table 29 as follows:</i></p> <table border="1" data-bbox="640 384 1805 1337"> <thead> <tr> <th colspan="5" data-bbox="640 384 1805 421"><b>Table 29: Performance indicators and targets for monitoring</b></th> </tr> <tr> <th data-bbox="640 421 772 458"><b>Policy</b></th> <th data-bbox="772 421 1019 458"><b>Objective</b></th> <th data-bbox="1019 421 1270 458"><b>Indicator</b></th> <th data-bbox="1270 421 1547 458"><b>Targets Aims</b></th> <th data-bbox="1547 421 1805 458"><b>Targets</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="640 458 772 895">EN1</td> <td data-bbox="772 458 1019 895">Provide additional rural spatial direction/ settlement hierarchy (i.e. large/ small/ restraint villages and open countryside)</td> <td data-bbox="1019 458 1270 895">Number of dwellings permitted within the different areas of the settlement hierarchy</td> <td data-bbox="1270 458 1547 895">Direct development to Rushden and the Market Towns<br/>Restrict all but small scale or infill development in rural areas, unless promoted through Neighbourhood Plans and/ or rural exceptions housing schemes</td> <td data-bbox="1547 458 1805 895"> <p><u>Levels of development to accord with the spatial roles set out in table 2 of the Plan</u></p> <p><u>Levels of residential development to align with table 3 of the Plan</u></p> </td> </tr> <tr> <td data-bbox="640 895 772 1337">EN2</td> <td data-bbox="772 895 1019 1337">Provide a clear differentiation between the urban/ built up areas and their surrounding rural hinterlands<br/><u>Provide development principles to guide development in the rural area.</u></td> <td data-bbox="1019 895 1270 1337">Number of dwellings permitted within the main urban areas, and beyond the main urban areas<br/><u>Location and type of development</u></td> <td data-bbox="1270 895 1547 1337">Restrict inappropriate development beyond the main urban/ built up areas</td> <td data-bbox="1547 895 1805 1337"><u>All proposals to meet the requirements of the policy.</u></td> </tr> </tbody> </table> |   |  |  | <b>Table 29: Performance indicators and targets for monitoring</b> |  |  |  |  | <b>Policy</b> | <b>Objective</b> | <b>Indicator</b> | <b>Targets Aims</b> | <b>Targets</b> | EN1 | Provide additional rural spatial direction/ settlement hierarchy (i.e. large/ small/ restraint villages and open countryside) | Number of dwellings permitted within the different areas of the settlement hierarchy | Direct development to Rushden and the Market Towns<br>Restrict all but small scale or infill development in rural areas, unless promoted through Neighbourhood Plans and/ or rural exceptions housing schemes | <p><u>Levels of development to accord with the spatial roles set out in table 2 of the Plan</u></p> <p><u>Levels of residential development to align with table 3 of the Plan</u></p> | EN2 | Provide a clear differentiation between the urban/ built up areas and their surrounding rural hinterlands<br><u>Provide development principles to guide development in the rural area.</u> | Number of dwellings permitted within the main urban areas, and beyond the main urban areas<br><u>Location and type of development</u> | Restrict inappropriate development beyond the main urban/ built up areas | <u>All proposals to meet the requirements of the policy.</u> | Hearings Action Point 178 |
|--|--|---|--|---|--|--|--|--|--|--|--|---------------|------------------|------------------|---------------------|----------------|-----|---|--|---|---|-----|--|---|--|--|---------------------------|
| <b>Table 29: Performance indicators and targets for monitoring</b> |  |   |  |   |  |  |  |  |  |  |  |               |                  |                  |                     |                |     |   |  |   |   |     |  |   |  |  |                           |
| <b>Policy</b>  | <b>Objective</b>   | <b>Indicator</b>  | <b>Targets Aims</b>  | <b>Targets</b>  |  |  |  |  |  |  |  |               |                  |                  |                     |                |     |   |  |   |   |     |  |   |  |  |                           |
| EN1  | Provide additional rural spatial direction/ settlement hierarchy (i.e. large/ small/ restraint villages and open countryside)  | Number of dwellings permitted within the different areas of the settlement hierarchy  | Direct development to Rushden and the Market Towns<br>Restrict all but small scale or infill development in rural areas, unless promoted through Neighbourhood Plans and/ or rural exceptions housing schemes  | <p><u>Levels of development to accord with the spatial roles set out in table 2 of the Plan</u></p> <p><u>Levels of residential development to align with table 3 of the Plan</u></p> |  |  |  |  |  |  |  |               |                  |                  |                     |                |     |   |  |   |   |     |  |   |  |  |                           |
| EN2  | Provide a clear differentiation between the urban/ built up areas and their surrounding rural hinterlands<br><u>Provide development principles to guide development in the rural area.</u> | Number of dwellings permitted within the main urban areas, and beyond the main urban areas<br><u>Location and type of development</u> | Restrict inappropriate development beyond the main urban/ built up areas   | <u>All proposals to meet the requirements of the policy.</u>  |  |  |  |  |  |  |  |               |                  |                  |                     |                |     |   |  |   |   |     |  |   |  |  |                           |

Schedule of proposed Main Modifications – March 2023

|  |  |  |     |   |   |   |  |  |
|--|--|--|-----|---|---|---|--|--|
|  |  |  | EN3 | Provide a clear differentiation between the freestanding villages and their surrounding rural hinterlands   | Number of dwellings permitted within the free-standing villages, and beyond the free standing village areas   | Restrict inappropriate development beyond the free standing villages  |  |  |
|  |  |  | EN4 | Provide a clear differentiation between urban outliers/ ribbon developments and their surrounding rural hinterlands   | Number of dwellings permitted within the ribbon development areas of lower Crow Hill (Irthlingborough) and Brooks Road (Raunds)                                 | Restrict inappropriate development in the defined ribbon development areas  |  |  |
|  |  |  | EN5 | Protect the peripheral land of settlements against unsuitable development and provide suitable development management criteria for Rural Exceptions Housing schemes | Development permitted outside of the defined settlement boundaries: number of rural affordable units achieved (Rural Exceptions and open countryside dwellings) | Restrict inappropriate development on the periphery of settlements with a defined boundary, but encourage the provision of affordable housing to meet identified needs in the rural areas | <b><u>No inappropriate development on the periphery of settlements, other than for rural exceptions.</u></b> |  |
|  |  |  | EN6 | Provide clear guidelines for appropriate  | Number of dwellings permitted and/ or   | Restrict the development of inappropriate new   | <b><u>No inappropriate new build</u></b>   |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |     |   |  |   |   |  |  |
|--|--|--|-----|---|--|---|---|--|--|
|  |  |  |     | replacement dwellings in open countryside   | built in the open countryside  | build replacement dwellings in open countryside   | <b><u>replacement dwellings in the open countryside other than those which accord with Policy EN6.</u></b>                              |  |  |
|  |  |  | EN7 | Protect and enhance existing and future Green Infrastructure corridors              | Net loss/ gain in GI across the district<br>New open space provided within or connected to the existing GI network<br>Projects to enhance GI in the district | <del>Net</del> To increase in connected open space and GI throughout the district                       | <b><u>Overall net gain in GI.</u></b>   |  |  |
|  |  |  | EN8 | Protect and enhance the Greenway and its connections to the wider GI network        | Number and amount of contributions by developers and other funding streams<br>Completion of Greenway projects/ developments                                  | Complete the Greenway within the district   | <b><u>Increase in the number of GI projects completed.</u></b><br><br><b><u>Completion of the Greenway and associated projects.</u></b> |  |  |
|  |  |  | EN9 | Define an enhanced local interpretation of the NPPF criteria for the designation of | Designation of Local Green Space within Neighbourhood Plans  | <del>No loss of Local Green Space</del> <b><u>To facilitate the protection of Local Green Space</u></b> | <b><u>No loss of Local Green Space.</u></b><br><br><b><u>Net increase in Local Green Space.</u></b>                                     |  |  |



Schedule of proposed Main Modifications – March 2023

|  |  |  |      |  |   |   |  |  |
|--|--|--|------|--|---|---|--|--|
|  |  |  |      | Local Green Space  |   |   |  |  |
|  |  |  | EN10 | Enhance existing open space or provide new open space  | Number of permitted developments of 10 or more dwellings, or 0.3 or more hectares   | Net increase in open space across the district<br><b><u>To ensure new development makes adequate provision for open space.</u></b>  | <b><u>Net increase in open space across the district.</u></b><br><br><b><u>No net loss of open space.</u></b>  |  |
|  |  |  | EN11 | Enhance existing sport and recreation facilities, or provide new sport and recreation facilities                     | Number of permitted strategic developments<br><b><u>Amount of new sports and recreation facilities provided/ contributions secured toward facilities.</u></b> | Net increase in sport and recreation facilities across the district<br><b><u>To ensure new development makes adequate provision for sports and recreation facilities.</u></b> | <b><u>Net increase in sport and recreation facilities provided/ increase in improvements towards existing facilities.</u></b><br><br><b><u>No net loss of sport and recreation facilities.</u></b> |  |
|  |  |  | EN12 | Provide additional direction re strengthening the role of health and wellbeing as a critical aspect of place shaping | Number of permissions and refusals where the policy was used to make the decision   | <b><u>To enable and promote healthy lifestyles.</u></b><br>Submission of Health Impact Assessments to accompany all major planning applications.                              | <b><u>All major applications to be accompanied by a HIA.</u></b>   |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      |  |  |   |  |  |
|--|--|--|------|--|--|---|--|--|
|  |  |  |      |  | Refusal of planning permission where insufficient mitigation is proposed to address negative health impacts.   |   |  |  |
|  |  |  | EN13 | Provide clear guidance for the design of development with regard to its impact on the surrounding area | Number of permissions and refusals where the policy was used to make the decision.<br><br><b><u>No upheld at appeal</u></b>  | Restrict inappropriate development of new buildings and extensions so that they are in keeping with the surrounding environment | <b><u>100% of cases refused on design grounds to be upheld at appeal.</u></b>  |  |
|  |  |  | EN14 | Sustain and enhance the appearance and setting of designated heritage assets                           | Number of permissions and refusals where the policy was used to make the decision<br><br><b><u>Maintaining Heritage Assets</u></b><br><br><b><u>Maintaining non designated Heritage Assets</u></b><br><br><b><u>Change in areas designated for</u></b> | Restrict inappropriate development which affects a designated heritage asset or its setting                                     | <b><u>Maintain existing areas designated Conservation Areas (no net loss):</u></b><br><br><b><u>Maintain existing number of listed buildings (no loss)</u></b><br><br><b><u>Maintain the number of</u></b> |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      | <u>their intrinsic environmental value including sites of international, national, regional, sub regional or local significance</u>   |   | <u>Scheduled Monuments:</u><br><br><u>Reduce the number of heritage assets at risk (number on Historic England's Heritage at Risk Register)</u>              |   |  |
|--|--|--|------|---|---|--|---|--|
|  |  |  | EN15 | Sustain and enhance the appearance and setting of non-designated heritage assets  | Number of permissions and refusals where the policy was used to make the decision   | Restrict inappropriate development which affects a non-designated heritage asset or its setting  | <u>Maintain non-designated heritage assets (no loss).</u> |  |
|  |  |  | EN16 | Provide clear direction for tourist and cultural developments in the Nene Valley corridor and Rockingham Forest areas and support the conversion of small-scale redundant or disused rural buildings to | Number of permitted tourist and cultural development within defined Nene Valley and Rockingham Forest areas<br><br>Number of permitted conversions of rural outbuildings to provide | Encourage appropriate development in the Nene Valley corridor and Rockingham Forest areas, including the conversion of redundant small-scale rural buildings | <u>A net increase of tourist/cultural facilities</u>      |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |       |  |  |  |  |  |
|--|--|--|-------|--|--|--|--|--|
|  |  |  |       | guest house/<br>B&B<br>accommodation   | overnight<br>accommodation   |  |  |  |
|  |  |  | -EN17 | Implementation<br>of SEN school<br>proposal at Land<br>west of Moulton<br>College,<br>Chelveston<br>Road within the<br>Plan period   | Development of<br>SEN school<br>proposal<br>permitted  | To deliver new<br>SEN school<br>development to<br>meet the needs<br>and requirements<br>of the Friars East<br>Academy  |  |  |
|  |  |  | EN18  | Set out policy<br>criteria for the<br>future<br>development/<br>expansion of<br>commercial<br>floorspace (e.g.<br>by way of the<br>development of<br>further<br>enterprise<br>centres or<br>similar) | Number of<br>developments<br>(future sites/<br>expansion of<br>existing<br>premises)<br>successfully<br>implemented in<br>accordance with<br>Policy EN18 | Encourage<br>established<br>businesses to<br>expand and grow<br>in appropriate<br>locations  | <b><u>A net increase<br/>in the number of<br/>completions for<br/>small and<br/>medium scale<br/>commercial<br/>development.</u></b>   |  |
|  |  |  | EN19  | Ensure that<br>existing<br>employment<br>sites are<br>protected for<br>employment use  | Use status of the<br>sites   | <b><u>No To prevent<br/>the</u></b> loss of<br>employment uses<br>within the<br>Protected<br>Employment<br>Areas unless the<br>site is<br>demonstrably no<br>longer suitable for<br>employment | <b><u>No net loss of<br/>employment<br/>uses within the<br/>Protected<br/>Employment<br/>Areas unless<br/>the site is<br/>demonstrably<br/>no longer<br/>suitable for<br/>employment</u></b> |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      |  |  |  |   |  |
|--|--|--|------|--|--|--|---|--|
|  |  |  | EN20 | Provide clear direction for the relocation and expansion of existing businesses              | Number of permissions and refusals where the policy was used to make the decision  | Encourage established businesses to expand and grow in appropriate locations                                 | <b><u>All expanded/relocated business to be adjacent to built up area.</u></b>  |  |
|  |  |  | EN21 | Increase the vitality of the town centres and primary shopping areas <b><u>frontages</u></b> | Public realm improvements within the town centres and primary shopping areas <b><u>frontages</u></b><br><br><b><u>Percentage of development within defined town centre boundaries</u></b><br><br><b><u>Change of use of upper floors</u></b><br><br><b><u>Change of use to residential (non-primary frontage)</u></b><br><br><b><u>Percentage of non-retail within primary frontages</u></b> | Encourage appropriate development within the town centres and primary shopping areas <b><u>frontages</u></b> | <b><u>Increase the percentage of town centre development within defined boundaries.</u></b><br><br><b><u>Decrease the number of vacancies at upper floor level.</u></b><br><br><b><u>Increase the percentage of retail uses within primary frontage/ decrease non-retail uses in frontages.</u></b> |  |
|  |  |  | EN22 | Provide floorspace   | Number of permitted retail   | Restrict inappropriate retail  | <b><u>No specific target, however,</u></b>  |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |       |   |  |   |  |  |  |
|--|--|--|-------|---|--|---|--|--|--|
|  |  |  |       | <p>thresholds for impact assessments for retail developments</p>  | <p>developments outside the primary shopping areas of the six towns</p> <p><b><u>Proposals for out / edge-of centre supported by a sequential test and an impact assessment where above the relevant threshold</u></b></p> | <p>development outside the primary shopping areas of the six towns</p>  | <p><b><u>monitoring indicator to identify the number and type of these developments.</u></b></p> <p><b><u>100% of proposals for out / edge-of centre supported by a sequential test and impact assessment above the relevant threshold</u></b></p> |  |  |
|  |  |  | EN23  | <p>Provide clear direction for specified main town-centre use developments <b>at</b> outside of the local centres</p> | <p>Number of permitted specified main town-centre uses <b>adjacent to</b> within 200m of the local centres</p>   | <p>Encourage specified main town-centre uses <b>at</b> outside of the local centres that offer day to day local services, improved connectivity and do not affect local amenity</p> | <p><b><u>100% adjoining/closely related to built up area;</u></b></p> <p><b><u>Amount of new floorspace for each type of use</u></b></p>   |  |  |
|  |  |  | -EN24 | <p>Delivery of sites in accordance with the Local Plan (Joint Core Strategy) requirements</p>                         | <p>Meeting overall strategic housing requirements at Oundle and delivery of</p>  | <p>To provide for strategic shortfall in housing numbers of around 300 dwellings at Oundle</p>  |  |  |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      |  |  |  |  |
|--|--|--|------|--|--|--|--|
|  |  |  |      | associated infrastructure  |  |  |  |
|  |  |  | EN25 | Implementation of Stoke Doyle Road site within the Plan period                                       | Meeting strategic housing requirements site specific                                     | To provide site specific housing requirements assisting the strategic shortfall at Oundle  | <b><u>Delivery of the site by 2031</u></b>   |
|  |  |  | EN26 | Implementation of Cotterstock Road site within the Plan period                                       | Meeting strategic housing requirements site specific                                     | To provide site specific housing requirements assisting the strategic shortfall at Oundle  | <b><u>Delivery of the site by 2031</u></b>   |
|  |  |  | EN27 | Implementation of St Christopher's Drive site within the Plan period                                 | Meeting strategic housing requirements site specific                                     | To provide site specific housing requirements assisting the strategic shortfall at Oundle  | <b><u>Delivery of the site by 2031</u></b>   |
|  |  |  | EN28 | Implementation of Land east of A6 Bypass/ Bedford Road site within the Plan period                   | Meeting strategic housing requirements site specific                                     | To provide site specific housing requirements assisting the strategic shortfalls for Rushden and Irthlingborough                                       | <b><u>Delivery of the site by 2031</u></b>   |
|  |  |  | EN29 | Delivery of an appropriate quantum of Category 3 (wheelchair accessible <b><u>or adaptable</u></b> ) | Number of Category 3 (wheelchair accessible <b><u>or adaptable</u></b> ) units delivered | <del>Delivery of 5% of units as Category 3 housing on sites of 50 dwellings or more</del> <b><u>To increase the delivery of Category 3 housing</u></b> | <b><u>Delivery of 5% of units as Category 3 housing on sites of 20 dwellings or more</u></b> |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      |   |   |  |  |  |
|--|--|--|------|---|---|--|--|--|
|  |  |  |      | housing to meet local needs   |   |  |  |  |
|  |  |  | EN30 | Delivery of an appropriate mix of housing sizes, types and tenures to meet local need   | Type, mix and range of units achieved<br><br><b><u>Proportion of 1, 2, 3, 4, 5+ bed properties.</u></b><br><br><b><u>Tenure split of properties</u></b>   | Encourages a range and mix of house types and tenures to meet the needs of the wider community<br><br><b><u>in accordance with the evidence base</u></b>   | <b><u>100% in accordance with tenure/ size proportions set out in the evidence base, unless justified by evidence</u></b>  |  |
|  |  |  | EN31 | Delivery of specialist housing:<br><ul style="list-style-type: none"> <li>• Older persons accommodation to meet local need</li> <li>• Extra Care development schemes as part of major strategic sites in accordance with local needs</li> </ul> | Numbers of older persons (and specifically Extra Care) units of accommodation achieved on sites over and above the defined policy thresholds<br><br>Successful delivery of Extra Care housing at named sites in accordance with development masterplans | Delivery of 10% of units as housing for older people, in accordance with defined policy thresholds<br><br>Delivery of Extra Care housing in association with development in accordance with policy criteria at named sites:<br><ul style="list-style-type: none"> <li>• <del>Rushden East SUE</del></li> <li>• <del>Irthlingborough West SUE</del></li> <li>• <del>St Christopher's Drive, Oundle</del></li> </ul> | <b><u>Delivery of 10% of units (20% in rural area) as housing for older people, in accordance with defined policy thresholds</u></b><br><br><b><u>Delivery of Extra Care housing in association with development in accordance with policy criteria at named sites:</u></b><br><ul style="list-style-type: none"> <li>• <b><u>Rushden East SUE</u></b></li> <li>• <b><u>Irthlingborough West SUE</u></b></li> <li>• <b><u>St Christopher'</u></b></li> </ul> |  |



Schedule of proposed Main Modifications – March 2023

|  |  |  |      |   |   |  |  |  |  |
|--|--|--|------|---|---|--|--|--|--|
|  |  |  |      |   | <ul style="list-style-type: none"> <li>• East of Ferrers School, Higham Ferrers</li> </ul> <p><b><u>To increase delivery of specialist housing for older persons.</u></b></p> | <p><b><u>s Drive, Oundle</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Hayway, Northampton ton Road, Rushden</u></b></li> <li>• <b><u>East of Ferrers School, Higham Ferrers</u></b></li> </ul> |  |  |  |
|  |  |  | EN32 | Delivery of self and custom build   | Number of self and custom built dwellings achieved on sites of 50 dwellings or more   | <p><del>At least 5% of plots on sites of 50 dwellings or more safeguarded for self or custom built dwellings</del> <b><u>To increase delivery of self and custom build housing.</u></b></p>                  | <p><b><u>At least 5% of plots on sites of 50 dwellings or more provided for self or custom built dwellings</u></b></p> <p><b><u>Meeting demand on self/custom build register</u></b></p> |  |  |
|  |  |  | EN33 | Implementation of Rushden East SUE in accordance with the Local Plan policy framework (Joint Core Strategy Policy 33/ new Policy EN33) and the agreed | <p>Meeting strategic housing requirements site specific</p> <p>Phased delivery of SUE in accordance with MFD phasing/ trajectories</p>  | <p><del>Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory for East Northamptonshire</del></p>                             | <p><b><u>Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory</u></b></p>                                |  |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  | Masterplan Framework Document (MFD) |   | <b><u>To ensure the principles for delivering the SUE are met.</u></b>   |   |   |
|--|--|--|-------------------------------------|---|--|---|---|
|  |  |  | EN34                                | Delivery of development within the town centres and surrounding urban areas in accordance with the development principles | Development permitted in accordance with the policy criteria<br><br><b><u>Enhance vitality/viability of town centres</u></b> | No of development proposals approved in accordance with all of the relevant policy criteria   | <b><u>Increased footfall in town centres</u></b><br><br><b><u>Increase in the proportion of retail use in town centres</u></b><br><br><b><u>Increase in proportion of town centre uses</u></b><br><br><b><u>Increase in the no of active frontages.</u></b><br><br><b><u>Reduction in the no of vacancies in town centres</u></b> |
|  |  |  | EN35                                | Redevelopment of the Splash Pool and Wilkinson sites  | Development permitted on the Splash Pool and Wilkinson sites   | Redevelopment of the sites to include pedestrian links, a new public square, public realm improvements, and provision of public car parking | <b><u>By 2031, redevelopment of the site as set out in Policy EN35.</u></b>   |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      |  |   |   |   |  |  |
|--|--|--|------|--|---|---|---|--|--|
|  |  |  | EN36 | Redevelopment of the former factory site between 71 Oakley Road and 37-51 Washbrook Road | Development permitted on the former factory site                      | Redevelopment of the site to include approximately 10 dwellings with a mix of housing types to meet local needs, developer contributions, vehicular access, and pedestrian/ cycle connections                 | <b><u>By 2031, redevelopment of the site as set out in Policy EN36.</u></b> |  |  |
|  |  |  | EN37 | Redevelopment of the Federal Estates site  | Development permitted for housing on the Federal Estates site         | Redevelopment of the site to include at least 120 dwellings with a mix of housing types to meet local need, developer contributions, improved connections and link roads, and appropriate mitigation measures | <b><u>By 2031, redevelopment of the site as set out in Policy EN37.</u></b> |  |  |
|  |  |  | EN38 | Release and redevelopment of the Rectory Business Centre site for housing                | Development permitted for housing on the Rectory Business Centre site | Redevelopment of the site to include at least 35 dwellings with a mix of housing types to meet local need, developer contributions, improved connections and  | <b><u>By 2031, redevelopment of the site as set out in Policy EN38.</u></b> |  |  |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      |  |  |   |   |
|--|--|--|------|--|--|---|---|
|  |  |  |      |  | appropriate mitigation measures  |   |   |
|  |  |  | EN39 | Redevelopment of the former Select & Save and St Peter's Way Car Park site | Development permitted on the former Select & Save and St Peter's Way Car Park site | Redevelopment of the site to include a mix of main town centre uses, enhancement of the primary shopping frontage, pedestrian connections, suitable service arrangements, public car parking, live-work units at first floor or above, and enhancement to the settings of heritage assets | <b><u>By 2031, redevelopment of the site as set out in Policy EN39.</u></b> |
|  |  |  | EN40 | Redevelopment of the former Rushden and Diamonds FC Stadium site           | Development permitted on the former Rushden and Diamonds FC Stadium site           | Redevelopment of the site to include flood compatible employment uses, appropriate flood mitigation measures, enhancements to biodiversity, improved pedestrian and cycle connections, high quality landscaping, and new moorings   | <b><u>By 2031, redevelopment of the site as set out in Policy EN40.</u></b> |

Schedule of proposed Main Modifications – March 2023

|  |  |  |      |   |   |   |   |  |  |
|--|--|--|------|---|---|---|---|--|--|
|  |  |  | EN41 | Redevelopment of the Riverside Hotel site | Development permitted on the Riverside Hotel site | Redevelopment of the site for restaurant, public house, hotel, tourist, training facility/ resource centre, or small business/ employment use, to include retention and enhancement of the heritage asset, appropriate flood mitigation measures, new moorings, and improved arrangements for pedestrians/ cyclists | <b><u>By 2031, redevelopment of the site as set out in Policy EN41.</u></b> |  |  |
|  |  |  | EN42 | Redevelopment of the Cattle Market site   | Development permitted on the Cattle Market site   | Redevelopment to include a mix of main town centre uses, opening up of a new active frontage, pedestrian connectivity, vehicular access, appropriate residential uses at first floor level or above, enhancements to  | <b><u>By 2031, redevelopment of the site as set out in Policy EN42.</u></b> |  |  |

## Schedule of proposed Main Modifications – March 2023

|  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|
|  |  |  |  |  |  | the setting of heritage assets, and public car parking |  |  |
|--|--|--|--|--|--|--|--|--|

## Glossary

|      |          |     |  |  |
|------|----------|-----|--|--|
| MM88 | Glossary | 221 | <p><i>Amend glossary definition as follows:</i></p> <p>Infill or windfall development- Smaller scale, minor development proposals, typically up to 5 dwellings for rural or 10 dwellings for urban areas, which take place within the existing built up area, as defined by Policies EN2-EN4 <b><u>EN1-EN2 and the supporting text.</u></b></p>      | For clarity following revision to Policies EN1 - 4 |
| MM89 | Glossary | 223 | <p><i>Amend definition for Primary Shopping Area/ Primary Shopping Frontage as follows:</i></p> <p>Primary Shopping Area (<del>or Primary Shopping Frontage</del>) – defined areas where retail development is concentrated.</p> <p><b><u>Primary Shopping Frontage – Shopping frontage which contains a high proportion of retail uses.</u></b></p> | Hearings Action Point 94                           |

## Appendix 1

|      |             |                     |  |  |
|------|-------------|---------------------|--|--|
| MM90 | Policy EN33 | Appendix 1, page 12 | <p><i>Amend Strategic/ non-strategic (with commentary) column as follows:</i></p> <p><del>Non-</del><b><u>sStrategic</u></b> – Policy 33 of the Joint Core Strategy provides the strategic direction; i.e. establishing the principle of development to the east of the A6 Bypass, Rushden. Policy EN33 provides additional site-specific detail; i.e. setting site boundary/ zonal allocation and allowing for incorporation of Masterplan Framework Document into Local Plan Part 2.</p> | To reflect discussions at the hearing sessions. (Action Point 2) |
|------|-------------|---------------------|--|--|

## Schedule of proposed Main Modifications – March 2023

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | <i>In addition, revised Policies EN1 and EN2 remain as strategic policies, whilst Policies EN3, EN4, EN17 and EN24 are deleted as policies.</i> |  |
|--|--|--|---|--|

### Appendix 5

|      |   |                    |  |                          |
|------|---|--------------------|--|--------------------------|
| MM91 | Appendix 5 - Specialist and Older Persons Housing Provision | Appendix 5, page 2 | Amend the type of home in the final table as follows:<br>Apartment, <del>or</del> bungalow <b><u>or smaller home</u></b> | Hearings Action Point 74 |
|------|---|--------------------|--|--------------------------|

### Appendix 6

|      |                                 |            |  |                                       |
|------|---------------------------------|------------|--|---------------------------------------|
| MM92 | Appendix 6 – Rushden East MFD   | Appendix 6 | Delete Appendix 6 in its entirety and associated references to Appendix 6. | Post Hearings Letter Action           |
| MM93 | Appendix 6 – Housing Trajectory | Appendix 6 | Insert new Appendix 6 as follows:  | In response to request from Inspector |

|                                 |                           |                |                |                |                |                |                |                |                |                |                |                |
|---------------------------------|---------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Source of Housing Supply</b> | <b>2011/12 to 2019/20</b> | <b>2020/21</b> | <b>2021/22</b> | <b>2022/23</b> | <b>2023/24</b> | <b>2024/25</b> | <b>2025/26</b> | <b>2026/27</b> | <b>2027/28</b> | <b>2028/29</b> | <b>2029/30</b> | <b>2030/31</b> |
|---------------------------------|---------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|

## Schedule of proposed Main Modifications – March 2023

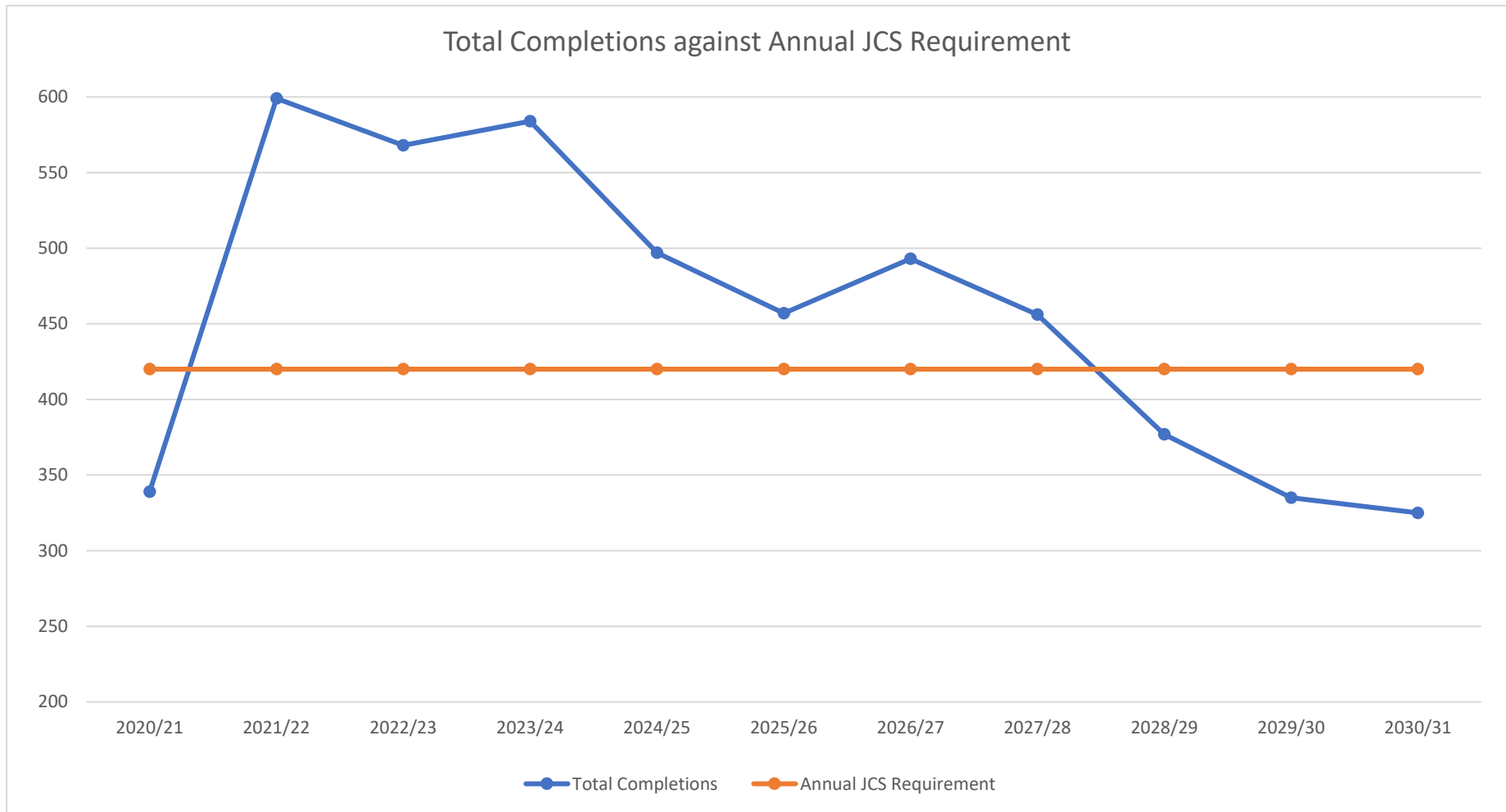
|   |      |     |     |     |     |     |     |     |     |     |     |     |
|---|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| <b>Past Completions</b>   | 3883 |     |     |     |     |     |     |     |     |     |     |     |
| <b>3b - Under construction/ started</b>                             |      | 263 | 179 | 114 | 108 | 8   | 0   | 0   | 0   | 0   | 0   | 0   |
| <b>3c(i) - Full planning permissions/ minor outline permissions</b> |      | 66  | 207 | 98  | 2   | 0   | 0   | 0   | 0   | 0   | 0   | 0   |
| <b>3c(ii) - Outline planning permissions (major &gt;9)</b>          |      | 0   | 0   | 14  | 10  | 0   | 0   | 0   | 0   | 0   | 0   | 0   |
| <b>3e - Major urban extensions</b>                                  |      | 0   | 0   | 0   | 0   | 100 | 150 | 200 | 250 | 250 | 250 | 250 |
| <b>3f - Other site allocations (current local plan)</b>             |      | 0   | 0   | 0   | 25  | 29  | 51  | 25  | 14  | 6   | 0   | 0   |
| <b>3g - Neighbourhood Plan site allocations (Made)</b>              |      | 0   | 2   | 119 | 183 | 172 | 109 | 128 | 132 | 41  | 5   | 10  |
| <b>3h(i) - Emergent DPD allocations</b>                             |      | 0   | 80  | 85  | 173 | 128 | 117 | 100 | 60  | 80  | 80  | 65  |
| <b>3h(ii) - Rural and Market Town windfall sites</b>                |      | 0   | 40  | 30  | 55  | 60  | 0   | 0   | 0   | 0   | 0   | 0   |



**Schedule of proposed Main Modifications – March 2023**

|  |      |      |      |      |      |      |      |      |      |      |      |      |
|--|------|------|------|------|------|------|------|------|------|------|------|------|
| <b>3j - Specific, unallocated brownfield sites</b> |      | 10   | 91   | 108  | 28   | 0    | 30   | 40   | 0    | 0    | 0    | 0    |
| <b>Total Completions</b>                           | 3883 | 339  | 599  | 568  | 584  | 497  | 457  | 493  | 456  | 377  | 335  | 325  |
| <b>Cumulative Total</b>                            |      | 4222 | 4821 | 5389 | 5973 | 6470 | 6927 | 7420 | 7876 | 8253 | 8588 | 8913 |
| <b>JCS Cumulative Requirement</b>                  |      | 4200 | 4620 | 5040 | 5460 | 5880 | 6300 | 6720 | 7140 | 7560 | 7980 | 8400 |
| <b>Annual JCS Requirement</b>                      |      | 420  | 420  | 420  | 420  | 420  | 420  | 420  | 420  | 420  | 420  | 420  |

### Schedule of proposed Main Modifications – March 2023



# Schedule of Proposed Additional Modifications to the Submission Local Plan

## Part 2 Local Plan

March 2023

## Introduction

The schedule includes:

- The reference number for the minor modification with the prefix 'AM'
- A cross reference to the section/ paragraph/ policy number/ figure or table to which the modification applies
- A cross reference to the relevant page number/s to which the modification applies
- Details of the proposed modification
- A reason as to why the modification is necessary

The following format has been used to denote the proposed main modifications:

- **Bold underlined** – new text proposed
- ~~Strikethrough~~ – text proposed for deletion

Separate schedules of proposed changes set out for the Main Modifications and Policies Map changes have been prepared to illustrate additional proposed changes arising from the modifications.

Representations will be invited on the all proposed Modifications including changes to the Policies Map, but not on any other aspect of the plan.

Please note that additional (or minor) modifications are changes made by the Council which do not materially affect the policies in the plan. The Council is accountable for any such changes and they do not fall within the scope of the examination.

**Schedule of proposed Additional Modifications – March 2023**

| Ref No. | Para/<br>Policy/<br>Figure/T<br>able/Map<br>ref | Public<br>ation<br>Plan<br>Page | Proposed Change | Reason for<br>Change |
|---------|---|---------------------------------|-----------------|----------------------|
|---------|---|---------------------------------|-----------------|----------------------|

**Contents**

|     |                  |     |  |                |
|-----|------------------|-----|--|----------------|
| AM1 | Contents<br>Page | 1-4 | <i>Contents page to be amended to reflect the following Policy title changes (nb policies will be renumbered prior to Plan adoption)</i> | Factual update |
|-----|------------------|-----|--|----------------|

Schedule of proposed Additional Modifications – March 2023

|  |  |  | <b>Regulation 19 Policy Number</b>  | <b>Modified Policies</b>   |  |
|--|--|--|---|--|--|
|  |  |  | <i>EN1 Spatial Development Strategy</i>   | <i>EN1 Spatial Development Strategy</i>  |  |
|  |  |  | <i>EN2 Settlement boundary criteria- urban areas</i>                                | <del><i>EN2 Settlement boundary criteria- urban areas</i></del> <b>Development Principles</b>                        |  |
|  |  |  | <i>EN3 Settlement boundary criteria- free standing villages</i>                     | <del><i>EN3 Settlement boundary criteria- free standing villages</i></del>   |  |
|  |  |  | <i>EN4 Settlement boundary criteria- ribbon developments</i>                        | <del><i>EN4 Settlement boundary criteria- ribbon developments</i></del>  |  |
|  |  |  | <i>EN5 Development on the periphery of settlements and rural exceptions housing</i> | <i>EN5 Development on the periphery of settlements and rural exceptions housing</i>                                  |  |
|  |  |  | <i>EN6 Replacement dwellings in the open countryside</i>                            | <i>EN6 Replacement dwellings in the open countryside</i>   |  |
|  |  |  | <i>EN7 Green Infrastructure corridors</i>   | <i>EN7 <b>Local</b> Green Infrastructure corridors</i>   |  |
|  |  |  | <i>EN8 The Greenway</i>   | <i>EN8 The Greenway</i>  |  |
|  |  |  | <i>EN9 Designation of Local Green Space</i>   | <i>EN9 Designation of Local Green Space</i>  |  |
|  |  |  | <i>EN10 Enhancement and provision of open space</i>                                 | <i>EN10 Enhancement and provision of open space</i>  |  |
|  |  |  | <i>EN11 Enhancement and provision of sport and recreation facilities</i>            | <i>EN11 Enhancement and provision of sport and recreation facilities</i>   |  |
|  |  |  | <i>EN12 Health and wellbeing</i>  | <i>EN12 Health and wellbeing</i>   |  |
|  |  |  | <i>EN13 Design of buildings/extensions</i>  | <i>EN13 Design of buildings/extensions</i>   |  |
|  |  |  | <i>EN14 Designated Heritage Assets</i>  | <i>EN14 Designated Heritage Assets</i>   |  |
|  |  |  | <i>EN15 Non-Designated Heritage Assets</i>  | <i>EN15 Non-Designated Heritage Assets</i>   |  |
|  |  |  | <i>EN16 Tourism, cultural developments and tourist accommodation</i>                | <i>EN16 Tourism, cultural developments and tourist accommodation</i>   |  |
|  |  |  | <i>EN17 Land south of Chelveston Road, Higham Ferrers</i>                           | <del><i>EN17 Land south of Chelveston Road, Higham Ferrers</i></del>   |  |
|  |  |  | <i>EN18 Commercial space to support economic growth</i>                             | <i>EN18 Development of commercial space to support economic growth <b>for Small and Medium-sized enterprises</b></i> |  |
|  |  |  | <i>EN19 Protected Employment Areas</i>  | <i>EN19 Protected Employment Areas</i>   |  |

## Schedule of proposed Additional Modifications – March 2023

|  |  |  |  |  |  |
|--|--|--|--|--|--|
|  |  |  | <i>EN20 Relocation and/or expansion of existing businesses</i>                           | <i>EN20 Relocation and/or expansion of existing businesses</i>                           |  |
|  |  |  | <i>EN21 Town centres and primary shopping frontages</i>                                  | <i>EN21 Town centres and primary shopping frontages</i>                                  |  |
|  |  |  | <i>EN22 Impact test thresholds for retail development</i>                                | <i>EN22 Impact test thresholds for retail development</i>                                |  |
|  |  |  | <i>EN23 Development of main town centre uses around the local centres</i>                | <i>EN23 Development of main town centre uses around the <b>Local</b> centres</i>         |  |
|  |  |  | <i>EN24 Oundle housing allocations</i>   | <i>EN24 Oundle housing allocations</i>   |  |
|  |  |  | <i>EN25 Land rear of cemetery, Stoke Doyle Road, Oundle</i>                              | <i>EN25 Land rear of cemetery, Stoke Doyle Road, Oundle</i>                              |  |
|  |  |  | <i>EN26 Cotterstock Road/St Peter's Road, Oundle</i>                                     | <i>EN26 Cotterstock Road/St Peter's Road, Oundle</i>                                     |  |
|  |  |  | <i>EN27 St Christopher's Drive, Oundle</i>   | <i>EN27 St Christopher's Drive, Oundle</i>   |  |
|  |  |  | <i>EN28 Land east of the A6/Bedford Road, Rushden</i>                                    | <i>EN28 Land east of the A6/Bedford Road, Rushden</i>                                    |  |
|  |  |  | <i>EN29 Delivering wheelchair accessible housing</i>                                     | <i>EN29 Delivering wheelchair accessible housing</i>                                     |  |
|  |  |  | <i>EN30 Housing mix and tenure to meet local need</i>                                    | <i>EN30 Housing mix and tenure to meet local need</i>                                    |  |
|  |  |  | <i>EN31 Older people's housing provision</i>   | <i>EN31 Older people's housing provision</i>   |  |
|  |  |  | <i>EN32 Self and custom build housing</i>  | <i>EN32 Self and custom build housing</i>  |  |
|  |  |  | <i>EN33 Rushden East Sustainable Urban Extension</i>                                     | <i>EN33 Rushden East Sustainable Urban Extension</i>                                     |  |
|  |  |  | <i>EN34 Reimagining Town Centres- guiding principles</i>                                 | <i>EN34 Reimagining Town Centres- guiding principles</i>                                 |  |
|  |  |  | <i>EN35 Splash pool and Wilkos site redevelopment, Rushden</i>                           | <i>EN35 Splash pool and Wilkos site redevelopment, Rushden</i>                           |  |
|  |  |  | <i>EN36 Former factory site between 71 Oakley Road and 37-51 Washbrook Road, Rushden</i> | <i>EN36 Former factory site between 71 Oakley Road and 37-51 Washbrook Road, Rushden</i> |  |
|  |  |  | <i>EN37 Rectory Business Centre, Rusden</i>  | <i>EN37 Rectory Business Centre, Rusden</i>  |  |

Schedule of proposed Additional Modifications – March 2023

|     |                             |   |   |  |                |
|-----|-----------------------------|---|---|--|----------------|
|     |                             |   | <p>EN38 Federal Estates/former textile bonding factory site, Newton Road/Midland Road, Higham Ferrers</p> <p>EN39 Former Select &amp; Save, 13-21 High Street/St Peter's Way carpark, Irthlingborough</p> <p>EN40 Former Rushden and Diamonds FC stadium site, Nene Park, Diamond Way, Irthlingborough</p> <p>EN41 Riverside Hotel, Station Road, Oundle</p> <p>EN42 Cattle market, Market Road, Thrapston</p> <p>References to Policy numbers throughout the Plan will be amended to reflect the above changes.</p>  | <p>EN38 Federal Estates/former textile bonding factory site, Newton Road/Midland Road, Higham Ferrers</p> <p>EN39 Former Select &amp; Save, 13-21 High Street/St Peter's Way carpark, Irthlingborough</p> <p>EN40 Former Rushden and Diamonds FC stadium site, Nene Park, Diamond Way, Irthlingborough</p> <p>EN41 Riverside Hotel, Station Road, Oundle</p> <p>EN42 Cattle market, Market Road, Thrapston</p> |                |
| AM2 | Index of figures and tables | 8 | <p>The index of figures and tables will be updated to reflect changes and deletions. A list of appendices will be added to the Plan by including the following after the list of tables on page 8:</p> <p><b><u>Appendices:</u></b><br/> <b><u>Appendix 1 Policy Index</u></b><br/> <b><u>Appendix 2 Economic Use Classes</u></b><br/> <b><u>Appendix 3 Employment Protection Areas</u></b><br/> <b><u>Appendix 4 Town Centres; Primary Shopping Areas and Local Centres</u></b><br/> <b><u>Appendix 5 Specialist and Older Person Housing Provision-Site selection and design principles criteria</u></b><br/> Appendix 6 Rusden East SUE Masterplan Framework Document<br/> <b><u>Appendix 6 Housing Trajectory</u></b></p> |  | Factual update |



## Schedule of proposed Additional Modifications – March 2023

### Introduction

|     |           |       |  |                |
|-----|-----------|-------|--|----------------|
| AM3 | Chapter 1 | 11-26 | <i>Updates to the chapter to reflect the timescales in plan preparation and the latest factual position on issues will be provided prior to Plan adoption.</i> | Factual update |
|-----|-----------|-------|--|----------------|

### Area Portrait

|     |           |       |  |                            |
|-----|-----------|-------|--|----------------------------|
| AM4 | Chapter 2 | 27-37 | <i>Updates to the chapter to reflect the latest factual position.</i>  | Factual update             |
| AM5 | Para 2.9  | 29    | <i>Amend para 2.9 as follows:</i><br><br>Re word JOINT CORE STRATEGY as follows: Joint Core Strategy   | Typographical error        |
| AM6 | Para 2.11 | 29    | <i>Amend para 2.11 by adding the following words at the end of the current para:</i><br><br><b><u>Following the examination of the Plan it was proposed that the MFD (Appendix 6) be deleted from the Local Plan and taken forward as a Supplementary Planning Document.</u></b> | Update in relation to MM65 |
| AM7 | Para 2.54 | 37    | <i>Amend para 2.54 as follows:</i><br><br>In the final sentence delete the word” future” and replace with <b><u>emerging</u></b>   | For greater clarity        |

### Vision and Outcomes

|     |          |    |  |                |
|-----|----------|----|--|----------------|
| AM8 | Para 3.1 | 38 | <i>Amend text as follows:</i><br><br>As the North Northamptonshire Council <del>was</del> will be formed on 1 <sup>st</sup> April 2021, it will be a priority for the new unitary to update the Corporate Plan to set future priorities. | Factual update |
| AM9 | Para 3.5 | 39 | <i>Amend first sentence as follows:</i><br><br>The Plan will aim to identify those aspects of the <b><u>Joint</u></b> Core Strategy Vision.....  | Consistency    |

## Schedule of proposed Additional Modifications – March 2023

|      |           |    |  |   |
|------|-----------|----|--|---|
| AM10 | Para 3.7  | 41 | <p><i>Amend first sentence as follows:</i></p> <p>This Plan will recognise the 10 overarching outcomes of the <b>Joint</b> Core Strategy.....</p>  | Consistency                                 |
| AM11 | Para 3.8  | 44 | <p><i>Amend text as follows:</i></p> <p>The “presumption in favour of sustainable development” is a national planning policy requirement. <del>This is described as a “golden thread” running through plan-making and decision making. It should therefore...</del></p>  | Consistency with NPPF 2021 (Action Point 5) |
| AM12 | Para 3.9  | 44 | <p><i>Amend text as follows:</i></p> <p>3.9 The Joint Core Strategy has sought to define this within the context of North Northamptonshire (Policy 1). <del>Policy 1 states that:</del></p> <p><del>When considering development proposals, the Local Planning Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area meeting the challenges of climate change and protecting and enhancing the provision of ecosystems services. To be regarded as ‘sustainable’ within the context of North Northamptonshire, development should contribute to delivering the Plan Vision and Outcomes through compliance with the relevant policies of this Plan. Development that conflicts with policies of the Plan will be refused unless material considerations indicate otherwise. Where a development is otherwise acceptable, but an independent viability appraisal demonstrates that certain policy standards cannot be achieved, the Local Planning Authority will work with the applicant to consider alternative approaches to deliver the desired policy outcomes.</del></p> | Hearing outcome (Action Point 6)            |
| AM13 | Para 3.10 | 45 | <p><i>Amend text as follows:</i></p> <p><del>This plan similarly fits within this strategic framework. All plan policies and decisions must be made in accordance with the requirements of Joint Core Strategy Policy 1, such that proposals which conflict with strategic policies (i.e. Joint Core Strategy policies), this Plan or (where applicable) Neighbourhood Plans, should be refused unless material considerations indicate otherwise. The Development Plan must be read as a whole, and planning applications will be determined in accordance with the Development Plan.</del></p>   | Hearing outcome (Action Point 7)            |

## Schedule of proposed Additional Modifications – March 2023

|  |  |  |  |  |
|--|--|--|--|--|
|  |  |  |  |  |
|--|--|--|--|--|

### Spatial Development Strategy

|      |           |    |  |                        |
|------|-----------|----|--|------------------------|
| AM14 | Para 4.9  | 48 | Amend third sentence as follows:<br><br><del>Four years s</del> Since the adoption...  | Factual update         |
| AM15 | Para 4.25 | 50 | Amend first sentence of Para 4.25 as follows:<br><br>The historic character of Ashton has recently undergone a detailed assessment through the Ashton Conservation Area Appraisal and Management Plan...                     | Factual update         |
| AM16 | Figure 6  | 55 | The area immediately to the north of the A45, which includes Rushden Lakes and land to the west, (to be shown as part of the urban area of Higham /Rushden by including the shading depicted in the legend for urban areas). | Correction for clarity |
| AM17 | Para 4.37 | 60 | Amend the reference to NPPF paragraphs as follows:<br><br>(paragraphs <del>798-7980</del>  | Factual update         |
| AM18 | Para 4.44 | 62 | Amend NPPF reference in the first sentence as follows:<br><br>The NPPF (paragraph <del>8079</del> )  | Factual update         |
| AM19 | Para 4.45 | 62 | Amend first sentence by deleting reference to the original Policy EN3 which is deleted<br><br>(see Policy EN3, above)  | Correction for clarity |
| AM20 | Para 4.47 | 62 | Amend NPPF reference in the final sentence as follows:<br><br>(NPPF paragraph <del>787</del>   | Factual update         |

### Natural Capital

|      |                           |    |   |                                  |
|------|---------------------------|----|---|----------------------------------|
| AM21 | Supporting text to Policy | 67 | Amend final sentence of paragraph 5.9 as follows: | Improve readability/ consistency |
|------|---------------------------|----|---|----------------------------------|

## Schedule of proposed Additional Modifications – March 2023

|      |   |    |   |                |
|------|---|----|---|----------------|
|      | EN7<br>Para 5.9,<br>5.13 and<br>5.14                    |    | <p>Much of <b>the</b> GI network has already been established in the south of the district, so more attention is now required to deliver an improved GI network in the north of the district.</p> <p><i>Amend the first sentence of paragraph 5.13 as follows:</i></p> <p>The NPPF (paragraph <del>180</del><sup>175</sup>) recognises the importance of ancient woodlands and veteran trees as a key element of maintain the natural capital of the district.</p> <p><i>Amend first sentence of paragraph 5.14 as follows:</i></p> <p>Policy EN7 (<del>below</del>) ensures that the GI corridors across the district are protected and enhanced. It provides additional direction to support the delivery of GI as stipulated in Figure 17 and Policy 19 of the Joint Core Strategy. It is recognised that the delivery of enhancements to the priority GI corridors presents particular challenges; e.g. establishing connections across strategic roads or other physical barriers.</p> | Factual update |
| AM22 | Para<br>5.17<br>Supporti<br>ng text to<br>Policy<br>EN8 | 72 | <p><i>Amend paragraph 5.17 as follows:</i></p> <p>The made Neighbourhood Plans for Barrowden and Wakerley, Chelveston cum Caldecott, Higham Ferrers, Raunds, <b>Ringstead</b> and Warmington, <del>plus the emerging Neighbourhood Plan for Ringstead</del>, all include specific proposals for possible extensions and links to the Greenway, shown in Figure 8 (below).</p>   | Factual update |
| AM23 | Para<br>5.18<br>Supporti<br>ng text to<br>Policy<br>EN9 | 74 | <p><i>Amend first sentence of paragraph 5.18 as follows:</i></p> <p>Local Green Space (LGS) is designated as a national land use in the NPPF (paragraphs <del>99-101</del><sup>103</sup>).</p> <p><i>Amend first sentence of paragraph 5.20 as follows:</i></p> <p>The NPPF sets out specific criteria that would need to be met for land to be designated as LGS (paragraph <del>100</del><sup>2</sup>).</p>   | Factual update |

## Schedule of proposed Additional Modifications – March 2023

|      |           |    |   |                           |
|------|-----------|----|---|---------------------------|
| AM24 | Para 5.32 | 80 | <p>Add the following sub heading prior to para 5.32:</p> <p><b><u>Sport and Recreation</u></b></p>  | For Clarity               |
| AM25 | Para 6.7  | 86 | <p>Amend paragraph 6.7 by deleting the following words:</p> <p><del>and emerging Place Shaping Supplementary Planning Document</del></p>  | Factual update            |
| AM26 | Para 6.16 | 88 | <p>Amend paragraph 6.16 as follows:</p> <p>6.16 Policy EN12 (below) sets out how health and wellbeing, will be managed within the planning system, <b><u>including for example, the application of place shaping principles set out in JCS Policy 8 to ensure the delivery of good design that promotes health and well being.</u></b> It provides a mechanism for HIA to be incorporated into the development management system.</p> | Hearings Action Point 124 |
| AM27 | Para 6.17 | 89 | <p>Amend paragraph 6.17 by deleting the following words:</p> <p><del>This will be supported by a detailed Place Shaping Supplementary Planning Document (SPD), which is being prepared by the Joint Planning and Delivery Unit.</del></p>   | Factual update            |
| AM28 | Para 6.19 | 89 | <p>Amend first sentence of paragraph 6.19 and delete wording at the end of the paragraph as follows:</p> <p>The varied criteria set out in Policy 8 of the Joint Core Strategy relate to major <b><u>a range of</u></b> development schemes.</p> <p><del>especially in the absence of the finalised Place Shaping SPD.</del></p>  | Factual update            |
| AM29 | Para 6.24 | 91 | <p>Amend paragraph 6.24 as follows:</p> <p>6.24 The Joint Core Strategy contains an overarching policy for the protection of the historic environment (Policy <del>3</del> <b><u>2</u></b>). The need to provide more detailed local direction through this Plan has been considered. This Plan identifies where additional policies are necessary to</p>   | Hearings Action Point 134 |

## Schedule of proposed Additional Modifications – March 2023

|      |           |    |   |                |
|------|-----------|----|---|----------------|
|      |           |    | supplement Policy <del>32</del> of the Joint Core Strategy, with regard to both designated and non-designated heritage assets.  |                |
| AM30 | Para 6.28 | 92 | <p><i>Amend second sentence of paragraph 6.28 as follows:</i></p> <p>Policy EN14 (below) recognises the key principles of the NPPF. The balancing principles referred to in Policy EN14 reflect paragraphs <del>193–196</del><b>199-202</b> of the NPPF, providing additional district level direction.</p>   | Factual update |
| AM31 | Para 6.39 | 97 | <p><i>Amend second sentence of paragraph 6.39 as follows:</i></p> <p>The NPPF (paragraphs <del>86–90</del><b>87-91</b>) requires that larger scale proposals for new cultural assets will be subject to the Sequential and Impact Tests for main town centre uses, although smaller scale rural office, tourist or other small scale developments are exempt.</p> | Factual update |
| AM32 | Para 6.46 | 98 | <p><i>Amend second sentence of paragraph 6.46 as follows:</i></p> <p>This issue is reflected in national policy which sets a general presumption in favour of reusing redundant rural buildings for residential use (NPPF paragraph <del>80-79</del>(c))</p>  | Factual update |

Page 546

## Economic Prosperity

|      |           |     |   |  |
|------|-----------|-----|---|--|
| AM33 | Para 7.22 | 112 | <p><i>Amend paragraph 7.22 as follows:</i></p> <p>Chelveston <del>Employment and</del> <b>Energy</b> Innovation Park, to deliver zero-carbon solutions for industry, integrating high energy consumer businesses with large scale direct-supply renewable energy (estimated around 800 jobs);</p> | Factual correction to address comments from Chelveston cum Caldecott Parish Council (Rep 2/01) |
| AM34 | Para 7.32 | 115 | <p><i>Amend third bullet point as follows:</i></p> <p>The Enterprise Centre (Michael Way, Raunds) and other associated public <del>lead</del> <b>led</b> developments</p>   | Typographical correction   |

## Schedule of proposed Additional Modifications – March 2023

|      |           |     |   |                |
|------|-----------|-----|---|----------------|
| AM35 | Para 7.48 | 120 | Amend NPPF reference in the first sentence as follows:<br><br>(NPPF Paragraph <del>80</del> <b>81</b> )   | Factual update |
| AM36 | Para 7.52 | 121 | Amend NPPF reference in the first sentence and final sentence as follows:<br><br>(NPPF paragraph <del>85</del> <b>86</b> (b))<br><br>Table 13 (below) identifies where current up to date Neighbourhood Plan policies are already in place and/ or where previous Local Plan designations <b>are extant</b> . | Factual update |
| AM37 | Para 7.57 | 124 | Amend NPPF reference in the first sentence as follows:<br><br>The NPPF required the preparation of an impact assessment for retail, office and leisure uses beyond the town centres (paragraph <del>89</del> <b>90</b> ).....   | Factual update |
| AM38 | Para 7.63 | 127 | Amend NPPF reference in the final sentence as follows:<br><br>paragraph <del>92</del> <b>93</b> of the NPPF.....  | Factual update |
| AM39 | Para 7.64 | 127 | Amend NPPF reference in the first sentence as follows:<br><br>(NPPF paragraph <del>86</del> <b>7</b> )  | Factual update |
| AM40 | Para 7.72 | 128 | Amend NPPF reference in the first sentence as follows:<br><br>(paragraph <del>88</del> <b>9</b> )   | Factual update |

## Housing Delivery

|      |          |     |   |   |
|------|----------|-----|---|---|
| AM41 | Table 15 | 133 | Rushden East capacity should be <b>2,700</b> not 2,500, so total is <b>3,700</b> not 3,500<br>In the Note column relating to Irthlingborough delete comment and replace with the following:<br><b><u>Commitment on basis of JCS Annexe A.</u></b> | Factual update<br>Taylor Wimpey/BDW (Rep 57/15) |
| AM42 | Table 16 | 134 | Table 16 after para 8.8 – 4 <sup>th</sup> vertical column – 6 <sup>th</sup> column – heading <b><u>Commitments</u></b> is missing from heading  | Typographical correction                        |

## Schedule of proposed Additional Modifications – March 2023

|      |             |     |  |   |
|------|-------------|-----|--|---|
| AM43 | Para 8.17   | 136 | The word “strategic” in para 8.17 could be replaced by the word <b><u>indicative</u></b>   | For greater clarity                       |
| AM44 | Para 8.22   | 138 | <i>Amend para 8.22 first sentence as follows:</i><br><br>Further, to ensure that the housing allocations proposed are brought forward to reduce the impact of development within the local area, the following development principles set out in <b><u>the Oundle housing policies</u></b> <del>Policy EN24</del> will be expected to be addressed in addition to any specific requirements set out in each site allocation policy | For clarity, given Policy EN24 is deleted |
| AM45 | Para 8.26   | 139 | Third sentence of para 8.26 delete the word “west” and replace with <b><u>east</u></b> before the words Warren Bridge.   | Typographical correction                  |
| AM46 | Para 8.37   | 145 | Amend reference to NPPF paragraph as follows:<br><br>Paragraph <del>67</del> <b>8</b>  | Factual Update                            |
| AM47 | Policy EN28 | 149 | <i>Amend Policy EN28 para 2:</i><br><br>Delete “prcess” and reword as <b><u>process</u></b>  | Typographical correction                  |

Page 548

## Delivering Urban Extensions

|      |          |     |  |  |
|------|----------|-----|--|--|
| AM48 | Para 9.7 | 166 | <i>Amend para 9.7 first sentence as follows:</i><br><br>The extent of the <del>gross development area</del> <b><u>site allocation</u></b> to be shown on the Policies Map, is defined by Policy EN33 <del>below</del> <b><u>and depicted in Figure 18.</u></b>   | For clarity<br>Taylor<br>Wimpey/BDW<br>(Rep 57/) |
| AM49 | Para 9.9 | 169 | <i>Amend spelling of obligations in the second sentence and delete wording in the last sentence of paragraph 9.9 as follows:</i><br><br>Obligations<br><br>Given the passage of time ( <del>over six years</del> ) since the development was initially approved, it is probable that the S106 agreement would need to be comprehensively reviewed. | To update with 2020 monitoring information.      |



## Schedule of proposed Additional Modifications – March 2023

### Town Centre Strategies

|      |               |     |   |                                 |
|------|---------------|-----|---|---------------------------------|
| AM50 | Title         | 172 | <p><i>Change title from Town Strategies to ‘Town Centre Strategies’</i></p> <p><b>10.0 Town <u>Centre</u> Strategies</b></p>  | Hearings<br>Action Point<br>121 |
| AM51 | Para<br>10.4  | 172 | <p><i>Amend para 10.4 penultimate sentence as follows:</i></p> <p>There is no Neighbourhood Plan in preparation for Thrapston, <b><u>or Oundle.</u></b></p>   | Factual update                  |
| AM52 | Para<br>10.11 | 175 | <p><i>Amend second bullet point as follows:</i></p> <p>Land at Nene Valley Farm, Northampton Road, also known as “Rushden Gateway”<br/>(<del>mixed use retail, employment, and care home</del>); and</p>  | Factual update                  |
| AM53 | Para<br>10.13 | 176 | <p><i>Amend final sentence of para 10.13 as follows:</i></p> <p>Figure 20 and Table 24 (below) set out the main characteristics of each spatial area,<br/><del>together with the relevant spatial strategy policy references that would apply as</del><br/>follows:</p>   | To reflect<br>MM69              |
| AM54 | Para<br>10.21 | 180 | <p><i>Include reference to the flooding issue in the supporting text:</i></p> <p>There is an existing foul and surface water sewer in Anglian Water’s ownership within the boundary of the Splash Pool site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private spaces (e.g. domestic gardens/ back yards) where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert the sewer may be required.<br/><b><u>The majority of the site is situated within Flood Zone 2. Whilst this does not preclude more vulnerable forms of development (subject to appropriate flood mitigation measures), the site would be suitable for town centre uses, leisure or commercial uses.</u></b></p> | Hearings<br>Action Point<br>116 |
| AM55 | Para<br>10.22 | 181 | <p><i>Amend first bullet point as follows:</i></p>  | Typographical<br>correction     |

## Schedule of proposed Additional Modifications – March 2023

|      |            |     |  |  |
|------|------------|-----|--|--|
|      |            |     | Former factory site, between 71 Oakley Road and 37-51 <del>Westbrook</del> <b>Washbrook</b> Road (0.28ha) – identified in Brownfield Land Register;  |  |
| AM56 | Para 10.24 | 181 | Para 10.24 – Heading – reads “Westbrook” should be <b>Washbrook</b>  | Typographical correction   |
| AM57 | Para 10.33 | 185 | <i>Amend second sentence as follows:</i><br><br>This recognises the strong functional relationship between the two towns, and the different but closely related spatial development strategies (see Policy EN1(1)(a), <del>above</del> ).  | To reflect MM6   |
| AM58 | Para 10.36 | 185 | <i>Amend final sentence of para 10.36 as follows:</i><br><br>The NPPF and relevant Local Plan policies allow for the release of sites for alternative uses where there is no reasonable prospect of an application coming forward for the allocated use (paragraph 120 <del>2</del> ).   | Factual correction   |
| AM59 | Para 10.38 | 186 | <i>Amend para 10.38 as follows:</i><br><br>In 2019, Federal Estates Ltd submitted a two-part application, for the comprehensive redevelopment of these land holdings in Higham Ferrers, for housing. As part of the same application, it is proposed to relocate existing operations at the northern part of the Federal Estates site (south of Newton Road) to a new “Chelveston <del>Employment and</del> <b>Energy</b> Innovation Park”, to the south of the existing Chelveston Renewable Energy Park. The <b>Energy</b> Innovation Park focuses upon low carbon technologies, including energy storage <i>facilities and renewable hydrogen production, with a view to accelerating the growth of zero-carbon/ green industries. Permission for these proposals was granted in November 2020 (reference 19/01781/FUL), subject to S106.</i> | Factual correction to address comments from Chelveston cum Caldecott Parish Council (Rep 2/02) |
| AM60 | Para 10.42 | 188 | <i>Amend second sentence as follows:</i><br><br>Irthlingborough consists of five distinctive spatial parts. Figure 25 and Table 25 (below) outline the main characteristics of each area, <del>with the relevant spatial strategy policy references.</del>   | To reflect MM74  |

## Schedule of proposed Additional Modifications – March 2023

|      |            |     |  |                                   |
|------|------------|-----|--|-----------------------------------|
| AM61 | Para 10.45 | 191 | <p><i>Amend first sentence as follows:</i></p> <p>The spatial strategies for the Crow Hill parts of Irthlingborough are set in policies <del>EN1 and EN4</del> <b>EN1</b> and <b>EN4</b> of this Plan.</p>   | To reflect MM6                    |
| AM62 | Para 10.49 | 193 | <p>Para 10.49 – Error in numbering (should be 6 points) – No. 4: <b>Way</b> should be part of bullet point 3</p>   | Typographical correction          |
| AM63 | Para 10.56 | 195 | <p><i>Amend final sentence as follows:</i></p> <p>The latter, in particular, has been subject to several redevelopment proposals (further details at paragraphs 10.62<b>66</b>-10.64<b>68</b>, below).</p>   | To reflect paragraph re numbering |
| AM64 | Para 10.57 | 195 | <p><i>Amend second sentence as follows:</i></p> <p>Figure 28 and Table 26 (below) outline the main characteristics of each, <del>with the relevant spatial strategy policy references.</del></p>   | To reflect MM79                   |
| AM65 | Para 10.67 | 201 | <p><i>Amend final sentence of para 10.67 as follows:</i></p> <p>The workshops provided an opportunity for stakeholders to identify any other matters that the Neighbourhood Plan did not cover and are highlighted below (paragraph 10.69<b>73</b>).</p> | To reflect paragraph re numbering |
| AM66 | Para 10.68 | 201 | <p><i>Amend final sentence of para 10.68 as follows:</i></p> <p>Figure 31 and Table 27 (below) outline the main characteristics of each, <del>with the relevant spatial strategy policy references.</del></p>  | To reflect MM82                   |
| AM67 | Para 10.72 | 203 | <p><i>Amend final sentence as follows:</i></p> <p>Figure 32 and Table 28 (below) outline the main characteristics of each, <del>with the relevant spatial strategy policy references.</del></p>  | To reflect MM83                   |

## Schedule of proposed Additional Modifications – March 2023

|      |  |  |   |                    |
|------|--|--|---|--------------------|
| AM68 | Appendix 3<br>Rockingham Enterprise Area Map EN19 (07) |  | Amend to reflect the proportion of the site that lies within the East Northamptonshire area only. | Factual correction |
|------|--|--|---|--------------------|

### Appendix 4

|      |            |  |   |                           |
|------|------------|--|---|---------------------------|
| AM69 | Appendix 4 | 1 <sup>st</sup> and 5 <sup>th</sup> page of appendix 4 | <p><i>Amend front page of Appendix 4 as follows:</i></p> <p>Town Centres <b><u>boundaries</u></b> and Primary Shopping Areas <b><u>Frontages</u></b><sup>1</sup>:<br/> Irthlingborough<br/> Oundle<br/> Thrapston</p> <p><u>Local Centres:</u><br/> Raunds and Stanwick<br/> Rushden<br/> Brigstock<br/> Ringstead<br/> <b><u>Stanwick</u></b><br/> Woodford</p> <p><i>Amend Raunds and Stanwick Local Centres Map Legend as follows:</i></p> | Hearings Action Point 108 |
|------|------------|--|---|---------------------------|

<sup>1</sup> The Town Centres **boundaries** and **or** Primary Shopping Areas **and, where designated, Primary Shopping Frontages** for Higham Ferrers, Raunds and Rushden are designated in each of the Neighbourhood Plans for these towns

**Schedule of proposed Additional Modifications – March 2023**

|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | Raunds Secondary Shopping Area <b>(Relates to Raunds Neighbourhood Plan Policy)</b> |  |
|--|--|--|---|--|

This page is intentionally left blank

Schedule of Proposed Policies Map  
Modifications to the Submission Local  
Plan

Part 2 Local Plan

March 2023

## Introduction

The schedule includes:

- The reference number for the Policies Map modification with the prefix 'PM'
- A cross reference to the section/ paragraph/ policy number/ figure or table to which the modification applies
- A cross reference to the relevant page number/s to which the modification applies
- Details of the proposed modification
- A reason as to why the modification is necessary

The following format has been used to denote the proposed main modifications:

- **Bold underlined** – new text proposed
- ~~Strikethrough~~ – text proposed for deletion

Separate schedules of proposed changes set out for the Main and Additional Modifications have been prepared to illustrate additional proposed changes arising from the modifications.

Representations will be invited on the all proposed Modifications including changes to the Policies Map, but not on any other aspect of the plan.



## Schedule of proposed Policies Map Modifications – March 2023

| Ref No. | Map or Inset Plan | Proposed Change | Reason for Change |
|---------|-------------------|-----------------|-------------------|
|---------|-------------------|-----------------|-------------------|

### Policies Map

|     |                                      |  |  |
|-----|--------------------------------------|--|--|
| PM1 | Policies Map                         | <p>Amend the boundary of Rockingham Enterprise Area shown in relation to Policy EN19 (Site reference 19(7)) to exclude the area which is located outside the East Northamptonshire area.</p> <p>Amend policies map legend as follows:</p> <p>EN7 – <del>New Suggested</del> Local Green Infrastructure Corridors</p>   | Drafting error   |
| PM2 | Policies Map                         | <p>Policy EN8 Add the words <b>The Greenway</b> to the legend before the word Completed</p> <p>Policy EN8 Add the words <b>The Greenway</b> to the legend before the word Proposed</p> <p>Policy EN8 Add the words <b>The Greenway</b> to the legend before the word Indicative</p> <p>Policy EN8 Add the words <b>The Greenway</b> to the legend before the word Sustrans</p> | For clarity  |
| PM3 | Policies Map                         | Delete Policy EN8 Welland Valley Railway from the legend and map   | Does not relate to Policy EN8  |
| PM4 | Rushden and Higham Ferrers Inset Map | <p>Amend Rushden and Higham Ferrers legend as follows:</p> <p>EN21<del>3</del> – Town Centre Boundaries</p> <p>EN21<del>3</del> – Primary Shopping Frontages</p> <p>Update Local Centre Names in the legend to reflect those listed in the Policy.</p>   | Drafting error   |
| PM5 | Rushden and Higham Ferrers Inset Map | Delete Policy <del>EN167</del> SEN School from the legend and inset map  | Policy is proposed to be deleted through the Main Modifications Schedule |
| PM6 | Rushden and Higham                   | <p>Policy EN8 Add the words <b>The Greenway</b> to the legend before the word Completed</p> <p>Policy EN8 Add the words <b>The Greenway</b> to the legend before the word Proposed</p>   | For clarity  |

## Schedule of proposed Policies Map Modifications – March 2023

|      |                           |  |   |
|------|---------------------------|--|---|
|      | Ferrers Inset Map         | Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Aspirational Connections   |   |
| PM7  | Irthlingborough Inset Map | <i>Amend Irthlingborough Legend as follows:</i><br><br>EN21 <del>3</del> – Town Centre Boundaries<br>EN21 <del>3</del> – Primary Shopping Frontages  | Drafting error  |
| PM8  | Irthlingborough Inset Map | Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Proposed<br>Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Aspirational Connections   | For clarity   |
| PM9  | Irthlingborough Inset Map | Amend Policy reference to Crow Hill to reflect changes to the Plan as follows:<br>EN4- <del>1</del> Lower Crow Hill  | Due to Policy amendments set out in the Main Modifications Schedule |
| PM10 | Oundle Inset Map          | <i>Amend Oundle Legend as follows:</i><br><br>EN21 <del>3</del> – Town Centre Boundaries<br>EN21 <del>3</del> – Primary Shopping Frontages   | Drafting error  |
| PM11 | Oundle Inset Map          | Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Indicative   | For clarity   |
| PM12 | Oundle Inset Map          | Policy EN7 Add the word <b><u>GI Corridors</u></b> to the legend before the words New Cycle Routes   | For clarity   |
| PM13 | Oundle Inset Map          | Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Proposed<br>Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Aspirational Connections   | For clarity   |
| PM14 | Thrapston Inset Map       | <i>Amend Thrapston Legend as follows:</i><br><br>EN21 <del>3</del> – Town Centre Boundaries<br>EN21 <del>3</del> – Primary Shopping Frontages  | Drafting error  |
| PM15 | Thrapston Inset Map       | Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Indicative<br>Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Proposed<br>Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Aspirational Connections | For clarity   |

## Schedule of proposed Policies Map Modifications – March 2023

|      |                               |  |   |
|------|-------------------------------|--|---|
| PM16 | Raunds and Stanwick Inset Map | <p><i>Amend Legend as follows:</i></p> <p>EN2<del>1</del>3 –Raunds Primary Shopping Area</p> <p><del>EN23 – Raunds Secondary Shopping Area</del> and delete depiction on the inset map</p>                           | Drafting error  |
| PM17 | Raunds and Stanwick Inset Map | <p>Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Completed</p> <p>Policy EN8 Add the words <b><u>The Greenway</u></b> to the legend before the word Aspirational Connections</p> | For clarity   |
| PM18 | Raunds and Stanwick Inset Map | <p>Delete Policy reference to Brooks Road to reflect changes to the Plan as follows:</p> <p><del>EN4 – Brooks Road</del></p>   | Due to Policy amendments set out in the Main Modifications Schedule |

This page is intentionally left blank



## EXECUTIVE 16<sup>th</sup> November 2023

|                      |   |
|----------------------|---|
| <b>Report Title</b>  | <b>Procurement of Independent Living Care &amp; Support Provision across North Northamptonshire</b>                   |
| <b>Report Author</b> | David Watts, Executive Director of Adults, Health Partnerships and Housing (DASS) & Children's Services (Interim DCS) |
| <b>Lead Member</b>   | Councillor Helen Harrison, Executive Member for Adults, Health and Wellbeing  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input type="checkbox"/> Yes <input type="checkbox"/> No            |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> | Not applicable  |

### List of Appendices

**Appendix A** –SLT Business Case- Independent Living Settings (Extra Care)

**Appendix B** - Review of current provision, including capacity and demand mapping

**Appendix C** - Fee benchmarking with other Local Authorities & Cost Modelling

**Appendix D** - Specialist Housing with care & support options appraisal

**Appendix E**- Engagement with current providers, statutory partners and individuals who access services.

### **1. Purpose of Report**

---

- 1.1. The purpose of this report is to seek agreement from Executive to procure a Care & Support provision within Independent Living schemes (known previously as Extra Care schemes and will, hereafter, be referred to as Independent Living) for adults who are ordinarily resident in North Northamptonshire inclusive of those with mental health needs (including dementia), autism, learning disabilities, and physical/sensory disability. Where required, support will also be available to provide palliative and end of life regulated social care.
- 1.2. Procuring this specialised care and support provision will ensure the continuation of existing services for vulnerable individuals, whilst further utilising the framework for call-off options in association with new developments of

accommodation-related schemes. Alignment with the Council's Housing Strategy will demonstrate a commitment to delivering exceptional housing in North Northamptonshire, tailored to the unique needs of individuals requiring care and support residing within North Northamptonshire.

- 1.3. Independent Living schemes support Adult Social Care (ASC) priorities for individuals in North Northamptonshire by reducing the number of people who go into long term residential care and the number of preventable hospital re-admissions. It also facilitates timely hospital discharge and enables people to die at home with dignity in a supported environment.
- 1.4. Having good quality care and support within specialist accommodation enables the Council to meet the changing needs of existing and emerging communities.
- 1.5. This report is specifically related to care and support provision only. The development of future Independent Living sites and the Council's strategy to stimulate this, sits separately, with this provision laying the foundations for that ongoing work. The Framework for specialist care and support provision ensures NNC is ready with a contractual mechanism to call off care and support at sites as they are built over the length of the contract.

## **2. Executive Summary**

---

- 2.1. The current Care and Support in Specialist Housing Framework (CSSH), which commenced in April 2019, is due to expire on 31<sup>st</sup> March 2024.
- 2.2. The total contract value for the proposed seven-year contract is £4.2m
- 2.3. Review of current provision and engagement with both the wider Specialist Care and Support market plus stakeholders has been conducted in preparation for the procurement. In addition, benchmarking of both cost and service model has been undertaken with neighbouring Local Authorities and Councils nationally.
- 2.4. Based on the findings, it is proposed a six-year agreement with the option to extend for a further year is approved in order to provide certainty and stability to the system, whilst tracking the 10-year vision of Social Care Reform within the White Paper: People at the Heart of Care.
- 2.5. A Framework will enable awarded providers, to contract with the Council throughout the term of the agreement, encouraging new and specialist Providers into North Northamptonshire. In addition, the Framework will support a range of providers, to work with the Council, increasing diversity and volume within the market and maximising choice and sustainability in response to new schemes as they are built across the Council. Following a robust procurement process, providers will be awarded contracts having been assessed against a range of quality assurance tools, minimising risk to the Council.

### **3. Recommendations**

---

#### 3.1. It is recommended that the Executive:

- a) Approve the procurement of Care & Support provision within Independent Living Schemes to ensure North Northamptonshire remains compliant in its statutory responsibilities.
- b) Delegate to the Executive Member for Adults, Health and Wellbeing, in consultation with the Executive Director of Adults, Health Partnerships and Housing (DASS), to take any further decisions and/or actions required to conclude the procurement and award of the contract.
- c) Delegate to the Executive Member for Adults, Health and Wellbeing, in consultation with the Executive Director of Adults, Health Partnerships and Housing (DASS), to take any decisions in relation to future call-off and mini-competitions from the agreement.

#### 3.2 Reasons for Recommendations:

- A Framework will ensure that the Council can efficiently source specialist care and support in Independent Living settings in a timely fashion when responding to new scheme developments.
- The provision of high-quality care and support within Independent Living settings offers a beneficial and impactful alternative to residential care when Home First is no longer a sustainable long term accommodation option for individuals
- Commissioning of Care & Support provision within Independent Living settings, ensures the Council fulfils its statutory duty under the Care Act 2014 to provide care and support whilst preventing and influencing the delay of increasing need of ageing individuals.

3.3 The recommended approach maximises outcomes and value for money by supporting individuals with care and support needs to remain living independently for as long as they are able, delaying the need for residential care solutions. The Council is also better able to engage with contracted providers to support quality improvement and the shaping of services to meet the needs of people in North Northamptonshire. Furthermore, the Council is able to make informed decisions about its medium-term financial plan due to the reduction in need to source delivery with rates negotiated on a scheme-by-scheme basis.

#### 3.4 Alternative Options Considered:

- Making use of the Homecare Framework to source care and support provision – acknowledged not recommended due to absence of non-specialised support conducive to Independent Living settings. This would mean we could not influence the development of services tailored to the

provision of extra care and would limit opportunities to target care and support in a way that maximises independence in these settings.

- Negotiating individual contracts for each scheme on a non-framework agreement basis - acknowledged equally not recommended due to likelihood of higher cost impact in doing so. This also reduced our oversight of quality and safety and abilities to stimulate an efficient and effective market and service model.

## 4. Report Background

---

4.1. The Care Act 2014 places a statutory duty on local authorities to provide care and support to meet the identified needs of individuals. The current Care & Support in Specialist Housing (CSSH) contract, commissioned by Northamptonshire County Council, expires on 31<sup>st</sup> March 2024 with no option for further extension. This Contract included other service categories outside of Extra Care schemes' care and support provision which are now inactive/obsolete being superseded by other Contracts such as Commissioning for a Good Life (C4GL). The procurement within this report includes only Extra Care schemes' care and support provision.

4.2. Independent Living (Extra Care) schemes deliver a model of care which promotes independent living for a range of vulnerable people who would otherwise be at risk of social isolation, admission to hospital or residential care.

North Northamptonshire Council (NNC) established a multi-disciplinary project group to review current services, identify North Northamptonshire's future needs and assess the contracting options available to the Council. A range of activities have been undertaken including:

- a) Review of current provision, including capacity and demand mapping (**Appendix A**)
- b) Fee benchmarking with other Local Authorities & Cost Modelling (**Appendix B**)
- c) Specialist Housing with care & support options appraisal (**Appendix C**)
- d) Engagement with current providers, statutory partners and individuals who currently draw on services and those potential future users of services. (**Appendix D**)

4.3 The review evidenced that the number of people in North Northamptonshire aged over 75 is projected to increase by 26,700 (53% increase) over the next 20 years, with the over 85 age group increasing by 16,200 (94% increase). On this basis we expect demand for this model of care to increase.

4.4 At the time of writing<sup>1</sup>, there are 52 Council funded individuals receiving care and support within Independent Living Schemes, equating to 516 hours per week of care within North Northamptonshire. 27 of these individuals are aged over 65, eight are between the ages of 55 & 64 and 17 individuals younger than 55 are currently residing in Independent Living schemes.

---

<sup>1</sup> Data as at 24<sup>th</sup> July 2023



- 4.5 There will be limited interest from the market should rates not reflect the true costs of delivering care and support within these types of living environments. DHSC has not mandated a requirement to carry out a Fair Cost of Care (FCoC) exercise for this area of the market, however in light of this having taken place in both Care Homes (65+) and Homecare (18+) as a result of the Health and Social Care Bill 2022 already; recommissioning should ensure that the care and support in Independent Living settings is equally supported to remain sustainable.
- 4.6 The market for care services overall remains challenging in terms of recruiting and retaining the workforce, ongoing quality assurance and maintaining financial sustainability for the short to medium term. The Council remains committed to working collaboratively with service providers to develop strategies to address these and future challenges through innovative and hybrid models of care, which high focus on digitalisation and assistive technology.
- 4.7 Based on the identified population increases and current market capacity (**Appendix B**), it is vital that the Council commissions services in a way that encourages the market to develop in order to meet future demand and focus on priorities of prevent, reduce and delay need for higher levels of formal care.
- 4.8 The Council has engaged with current users, future users, providers and statutory partners to maximise engagement and collaboration to ensure an effective service model. Feedback received as part of these processes has informed the recommend approach and specification.
- 4.9 Consultation and a detailed commissioning review has identified a change in delivery model for Independent Living settings is both necessary and welcomed. Engagement with the market surrounding service and fee modelling concluded the current model was difficult to navigate, not fit for purpose, nor financially consistent or sustainable for Providers and the Council alike.
- 4.10 Benchmarking with other local authorities has identified that the proposed service model is progressive in its approach, ensuring service development and use of digital solutions to care and support are included within the specification. Thus, providing support to the system as a whole and ensuring individuals remain connected to their communities.
- 4.11 Fee modelling has been carried out in partnership with Finance colleagues. Recommended rates have been shaped by local authority benchmarking, (inclusive of the Fair Cost of Care exercise (FCoC)), engagement with the market and assistance from the Housing and Benefits team.
- 4.12 The Service Specification aligns with the strategic aims of Northamptonshire's Integrated Care system; increasing health and care provision within the community. All partners including statutory, voluntary and external service providers remain focused on the reduction of unnecessary admissions to hospitals and residential care homes, reducing delayed discharges from hospital and providing a stronger platform of integrated and preventative services.

- 4.13 The benefit to Individuals as well as Health and Social Care as a system are evidential. As an example, the falls rate in Independent Living settings (Extra care schemes) is currently 31%, this is significantly lower than that of those living in their own homes, where this figure increases to 49%. Those Individuals residing in such settings are also identified as having reduced levels of nights spent in hospital than may be expected in an equivalent population living in the community.
- 4.14 Care and support providers and the system collaboratively will:
- I. offer support for individuals to remain living independently and within their local communities safely and as valued citizens. Furthermore, delaying and reducing the need for residential bedded solutions of care.
  - II. continue to listen and involve individuals using services in the future development of these, in turn promoting independence and individual outcomes.
- 4.15 To support this, the specification will ensure support to individuals is delivered with the promotion of self-care where this remains possible and promotes joined up working with colleagues within Health and Voluntary sector agencies across North Northamptonshire for the benefit of individuals. At the same time, assisting providers to deliver the following key outcomes:
- a) Promotion of Independence – delaying and reducing the need for care and support
  - b) Improving Health and Wellbeing of Individuals
  - c) Ensuring a Positive Experience of Care and Support
  - d) Personal Dignity is maintained for Individuals
  - e) Increased choice and control for individuals
  - f) Providing quality of care and support that is person centred, culturally sensitive & strengths based in its focus.
  - g) Achieving good outcomes for individuals, giving support and encouragement
- 4.16 In addition, the specification will include a service development clause enabling the Council, and its partners, to work with providers during the life of the contract, to develop services, including but not limited to, increased use of assisted technology and digitalisation, in support of the transformation towards innovative, less intrusive, models of care and support.
- 4.17 The Commissioning and Quality teams will also work with both internal and external partners to develop the support available to providers. Access to training and an increasingly supportive quality and monitoring function will create added value for those choosing to work with the Council and will support service development and quality.
- 4.18 In line with North Northamptonshire Council's Contract Procedure Rules and Constitution, a report will be presented the Purchasing Gateway Group.

**5. Issues and Choices**

---

- 5.1 Officers have reviewed the existing contractual arrangements in conjunction with colleagues from both the Legal and Procurement teams. The maximum extension period for the current Contract will expire on 31<sup>st</sup> March 2024.
- 5.2 Failure to re-commission an effective contractual framework is not a recommended option due to the risk it presents. These are detailed in section 7.4
- 5.3 The findings of the review identified that an Open Framework was the preferred approach for North Northamptonshire due to ensuring readily available care and support provision within Independent Living settings is available as new schemes are built over the lifetime of the Contract.
- 5.4 In order to create stability in the market, whilst tracking alongside Social Care Reform, an agreement term of six years is proposed, with the option for a one-year further extension period. This further allows continued alignment to the Council’s Housing Strategy.
- 5.5 The Terms and Conditions will include an option for Integrated Care System partners to become co-commissioners of the Framework over its lifetime if required.
- 5.6 Engagement with the market commenced on 3<sup>rd</sup> May 2023 to ensure the new model was viable and sustainable for providers.

**6 Next Steps**

---

6.1 Following approval from the Executive, the procurement will be delivered as per the key timelines below.

|                     |                                    |
|---------------------|------------------------------------|
| Executive           | 16 <sup>th</sup> November 2023     |
| Tender Published    | w/c 20 <sup>th</sup> November 2023 |
| Evaluation          | w/c 27 <sup>th</sup> December 2023 |
| Contract Award      | w/c 12 <sup>th</sup> February 2024 |
| Contract Start Date | 1 <sup>st</sup> April 2024         |

**7 Implications (including financial implications)**

---

**7.1 Resources and Financial**

7.1.1 The total budget of £4.2m has been identified for the term of the contract. This has been based on our current annual expenditure on care and support within Independent Living settings of £551K per annum, with an additional investment required. This additional investment would be £42K and would be a new

pressure on the current draft Medium-Term Financial Plan. This investment will ensure long term savings for the Council. The proposed rates can be seen under **Appendix C**

- 7.1.2 The calculations and projections exclude one existing scheme Carey Street as an Independent Living Scheme as it will transfer to an Intensive Housing management model. Whilst work is still underway, all care and support needs are included in the identified budget, but it is anticipated a nominal charge will be required for emergency pull cord response.
- 7.1.3 An ageing population, with associated numbers of people with care and support needs over the age of 55, is likely to result in an increased demand for care and support in these settings. The Council will continue to work with the market over the life of the contract to develop good practice and efficiencies. Investing in the sector and supporting the market with new developments accordingly.
- 7.1.4 By the utilisation of the Open Framework, it is anticipated the Council will make savings in expenditure over the lifetime of the Contract due to the cessation of high core charges, adoption of consistent payment schedules and by ensuring a reduction in need for higher costing residential bedded provision by offering a viable alternative housing model offering flexible levels of care and support

## 7.2 Legal and Governance

- 7.2.1 Local authorities in England have a statutory duty under the Care Act 2014 to provide care assessments and meet the resulting assessed needs through the provision of care and support for vulnerable adults.
- 7.2.2 The services described in this report fall within those set out in schedule 3 to the Public Contracts Regulations 2015 (PCR) and are therefore subject to the light touch regime (LTR) described in regulation 74 to 76 of the PCR.
- 7.2.3 Under the LTR, the council can design its own procedure for LTR procurements provided that it -
  - a) complies with the principles of equal treatment and transparency.
  - b) carries out the procedure in conformity with information included in the notice
  - c) sets time limits that are reasonable and proportionate.
- 7.2.4 From section 2.5 of this report, a robust procurement process is to be followed and **Appendix A** (c) details the resources earmarked to ensure that the framework procured is fit for purpose.
- 7.2.5 Given that the Council is not required to use a particular procurement procedure, the selected option 3 can be followed through since the procurement will be designed to follow a compliant procurement process, which is in line with the requirements of the PCR and the Council's Contract Procedure Rules and Constitution.
- 7.2.6 The Legal team have been engaged throughout the procurement to ensure a full and appropriate contract is prepared to meet the requirement.

### **7.3 Relevant Policies and Plans**

- 7.3.1 The proposed service supports North Northamptonshire's Corporate Vision of being: "A place where everyone has the best opportunities and quality of life".
- 7.3.2 The service also aligns to Northamptonshire's Health and Care Partnerships vision of "a positive lifetime of health, wellbeing and care in our community".
- 7.3.3 An alignment to the Council's continued Housing Strategy.

### **7.4 Risk**

- 7.4.1 There is a risk of over interest from a generic unspecialised market due to Homecare providers with capacity looking to diversify.
- 7.4.2 Should the added investment as identified by finance colleagues not be agreed there will be limited interest from the specialised market. Growing costs associated with increasing business and staffing costs are impacting on providers ability to operate a viable service. The proposed model has attempted to mitigate this risk through regular market engagement, ensuring the service and contract is viable for bidders.

### **7.5 Consultation**

- 7.5.1 Market engagement has taken place with both providers delivering comparable services in other Local Authority areas and those currently on the Care and Support in Specialist Housing (CSSH) Framework to support with the remodelling of the service.
- 7.5.2 A range of internal stakeholders including Adult Social Care, Procurement, Housing and Finance, are members of the commissioning Project Group. This has ensured the service will meet the operational and corporate requirements of the Council.
- 7.5.3 Engagement has taken place with; individuals currently residing in Extra Care schemes, those individuals with autism and learning disabilities, in addition to those living with dementia. Individuals above the age of 50 in receipt of NNC funded Direct payments were sent a survey to capture views and help inform specification development. The same survey has been shared on the Council's public website to gather views of residents of North Northamptonshire.
- 7.5.4 The Service Specification reflects the feedback and needs of individuals, the provider market and other stakeholders including internal and external partners.

### **7.6 Consideration by Executive Advisory Panel (EAP)**

- 7.6.1 This paper has not been considered by an Executive Advisory Panel.

## **7.7 Consideration by Scrutiny**

7.7.1 The procurement process and/or any part of the requirement may be selected for consideration by Scrutiny.

## **7.8 Equality Implications**

7.8.1 In line with the Equality Act (2010) an Equality Screening Assessment has been undertaken and included as part of the report to the Procurement Gateway Group.

7.8.2 The Equality Screening Assessment approved by the Council's Equalities Team identifies the service will proactively meet the needs of individuals with protected characteristics.

7.8.3 The service will be relevant for all areas of North Northamptonshire where Independent Living schemes are situated now and equally built in the future. The care and support offered will be reflective of the needs of all diversity within local communities.

## **7.9 Climate and Environment Impact**

7.9.1 Providers will be required to deliver the service in a way that maximises fuel efficiency and limits impact on the climate and environment. Providers will work with North Northamptonshire Council to continuously review the service delivery model over the lifetime of the contract to benefit from new technologies or ways of working to further reduce environmental impact.

## **7.10 Community Impact**

7.10.1 The Council will continue to work with providers to maximise employment opportunities within the local community.

7.10.2 The Service will work collaboratively with the Voluntary, Community and Social Enterprise sector to deliver joined-up and holistic care and support to individuals accessing service.

## **7.11 Crime and Disorder Impact**

7.11.1 No implications identified.

## **8 Background Papers**

---

8.1 Procurement Gateway Group Form



## Appendix A – SLT Business Case- Independent Living Settings (Extra Care)

Recommissioning Independent Living (Extra Care) Care and Support provision is an integral component of our ongoing efforts within NNC's broader Housing Strategy being developed.

The scope of this Business case covers Extra Care Housing only, where its Care and Support provision contract is expiring on 31<sup>st</sup> March 2024. The total current contract value in scope of this paper is £551K.

### Executive summary

This business case serves three primary purposes:

- a) to ensure the continuation of existing services with current extra care providers for vulnerable individuals
- b) to utilise the new proposed framework through call-off options for the development of new accommodation-related schemes, aligning with NNC's Accommodation Plan/Strategy which will demonstrate a commitment to delivering exceptional housing in North Northamptonshire, tailored to the unique needs of individuals requiring care and support.
- c) To inform senior managers of the additional requested investment of £42K in order to procure a framework fit for purpose, that stimulates market appetite in the current climate and most importantly mitigates a higher cost impact from the risk of having no contract in place post 31<sup>st</sup> March 2024. If NNC were to become out of contract, these placements would revert to spot rates, which would become a much higher cost than the proposed new price increase in cost of £42K.

For context, this additional cost is in relation to a new tariff base of an overall current contract value of £551K. This contract currently supports 52 individuals. A table setting out the new tariffs affected, which has formed part of a detailed piece of work, can be seen under appendix A illustrating the proposed changes by type. This overall £42K cost increase is a change in the historic price structure and does not recognise any wider annual inflation potential uplift from 24/25, which has not yet been agreed.

### Background

It is vital that approval is secured regarding this business case, in order to progress NNC's commitment in addressing the evolving housing and associated care and support needs of our aging population whilst ensuring efficiencies and value for money for North Northamptonshire.

NNC currently have 4 Extra Care schemes contracted on the Care and Support in Specialist Housing (CSSH) Framework. This Contract will **expire on 31<sup>st</sup> March 2024** and carries no further extension period beyond this. There are financial risks identified for NNC should this provision not be reprocured in time for 1<sup>st</sup> April 2024.

NNC's primary objectives must be to ensure that forecasted numbers of specialist accommodation and associated services are available across the Unitary offering all people over the age of 55 a living environment which allows them to maintain their



independence within their local communities whilst also being able to receive flexible, responsive assistance as and when required.

These types of specialised accommodation models need developing to ensure individuals are offered real alternatives to residential care homes, whilst in turn offering a cost-effective comparable model of delaying, preventing and reducing the need for formal services, as well as reducing the likelihood of Individuals losing their homes.

The term Independent Living schemes will be used here onwards to cover what is currently known as Extra Care settings. These schemes support Adult Social Care (ASC) priorities for Individuals in North Northamptonshire by reducing the number of people who go into long term residential care, as well as reducing the number of preventable hospital re-admissions. They also proactively facilitate and support timely hospital discharge and ensure people are supported to die at home with dignity in a supported environment where this is their wish. These types of accommodation hold further key benefits in physical and mental wellbeing for a range of vulnerable people who would otherwise be at risk of social isolation.

To achieve the development of this model, NNC will prioritise collaboration, work with the market to develop adaptable housing solutions in bridging existing gaps, including in turn modernising some of the current older provision. At the core of NNC's strategic efforts lies:

- the establishment of a sustainable supply of affordable and accessible housing
- continued promotion of independence
- alignment of housing models with individual tenants' specific needs
- diversification of provision
- exploration of innovative support approaches. NNC will actively encourage engagement from organisations across various housing sectors to drive innovation.

NNC's success relies upon securing approval for proposed nominal investment in order to benefit from long term savings in the procurement of a framework which will:

1. support when development of new schemes (where gaps exist across the Council) require care and support provision being in situ.
2. Support robust forecasting and promoting financial sustainability for both the market and the Council.

## **Strategic Goals**

To realise these goals, we will work in close collaboration with our partners, prioritise evidence-based strategies, enhance accessibility to housing options, and leverage technology to transform personalised support. Our overarching aim is to make meaningful contributions to the efficient management of housing demand in North Northamptonshire.

**Statistics**

There are currently 65,357 people over the age of 65 residing in North Northamptonshire equating to 18.1% of the Council’s population made up in the following way;

| Age                    | Population | Percentage |
|------------------------|------------|------------|
| Aged 65 to 74 years    | 36,408     | 10.1       |
| Aged 75 to 84 years    | 21,326     | 5.9        |
| Aged 85 years and over | 7,623      | 2.1        |

The geographical location of 65’s and numbers are as follows:

| Area                 | Number of 65+ |
|----------------------|---------------|
| Corby                | 10,551        |
| East Northants Rural | 6,443         |
| East Northants Urban | 13,423        |
| Kettering Rural      | 5,449         |
| Kettering Urban      | 13,901        |
| Wellingborough Rural | 4,948         |
| Wellingborough Urban | 10,642        |

There has been rapid growth in older populations in the last 5 years. Numbers of over 80’s have doubled in the last 20 years.

Forecasted data indicates that the number of people in North Northamptonshire aged over 75 is projected to increase by 26,700 (53% increase) over the next 20 years, with the over 85 age group increasing by 16,200 (94% increase). NNC must ensure adequate provision is in place for the increase in demand for this model of care.

Additionally, the 2021 census projects there to be a 52% increase in the number of individuals with learning disabilities in the next 20 years. In terms of numbers this amounts to an additional 718 ageing people.

There are currently 118 individuals with learning disabilities aged 65 and above receiving a commissioned service. With an additional 147 individuals between the age of 55 and 64.

There are currently 627 people within North Northamptonshire aged 65 and over who are autistic. Based on the 2021 Census, there is a projected increase of 51.5% in the number of individuals with autism aged 65+ by 2040.

| Location       | Increase % in number forecasted at 2040 |
|----------------|---|
| Corby          | 59.18%                                  |
| East Northants | 56.12%                                  |

|                |        |
|----------------|--------|
| Kettering      | 48.09% |
| Wellingborough | 44.00% |

Alternatives to supported living and residential care homes also need to be available as choices for these groups of ageing individuals.

### Review of current Provision

The current contract for Care and Support in Specialist Housing (CSSH) will expire on 31<sup>st</sup> March 2024 with no further extension period available. This framework, initially commissioned by Northamptonshire County Council (NCC), carried an estimated contract value of for NNC of £38.75 million across the whole County and **included all supported living** provision as well as the small amount of Extra Care provision.

The current annual contract value/spend for Extra Care Provision **only** (excluding supported living provision) is £551K in North Northamptonshire.

Launched in April 2019, the CSSH framework aimed to promote independent living and reduce reliance on residential/nursing care placements. It served individuals aged 18 and above with diverse needs, encompassing mental health, learning disabilities, autism, physical disabilities, dementia, and nursing care.

NNC currently commissions care and support provision for individuals in four extra care schemes situated with North Northamptonshire. These 4 schemes equate to 166 units of available accommodation in total.

At present only 18 of these units are vacant, these had been identified as sales only accommodation, however responding to market need the provider is now in the process of these being converted to rental tenure.

Two providers, East Midlands Housing (EMH) and Extra Care Charitable Trust (ECTT) currently deliver the care and support provision within these 4 schemes. The Care Quality Commission (CQC) regulates these services.

Housing providers manage applicant registers, vacant properties, and waiting lists. under the current contract the Council procured care for all four extra care schemes. The new model incorporates feedback from tenants and carers, focusing on individualised care packages and 24/7 on-site urgent care, available to those with commissioned care.

Currently, 52 tenants across all schemes receive care services commissioned by the Council, amounting to £10,611 per week in total and equating to 516 hours per week of care within North Northamptonshire.

27 of these individuals are aged over 65, 8 are between the ages of 55 & 64, and 17 individuals younger than 55 currently reside in Independent Living schemes. The average cost for these services is £204.06 per week per individual. Other tenants within these schemes may purchase care from the on-site provider or choose their own provider and pay privately.

NNC's aim is to provide attractive alternatives to residential care homes, supporting independence, reducing pressure on social care services, and improving the overall well-being of our residents, ensuring couples remain able to reside together throughout their lives and in support of those associated changing needs encountered with both ageing and increased frailty.

With the introduction of other frameworks since 2019 such as Commissioning for a Good Life (C4GL), many of the categories within the CSSH Framework became inactive as a result and over time obsolete, being no longer required. The exception to this being the Extra Care provision which continues to be well utilised and therefore requires future provision securing.

In North Northamptonshire, we currently offer various Supported Living accommodation models, primarily catering for older people and individuals with learning disabilities, autism, and mental health needs. These services aim to provide individuals with their own accommodation whilst offering necessary support. There is notably a concentration of services in certain areas of North Northamptonshire. NNC plan to diversify and expand upon accommodation models for this group of individuals as part of this recommissioning activity.

Regarding mental health services, current accommodation provision is concentrated in specific areas, notably in suburban areas, which have pockets of deprivation. This does not align with the preferences and community ties of individuals living in other parts of the area. Currently 17 individuals with mental health needs are placed out of NNC's area due potentially to the limited variety of appropriate provision.

Individuals with other vulnerabilities and physical disabilities often access residential care accommodation models due to complexities and behaviours that both accommodation environments and the associated care and support provision have been unable to meet.

NNC recognises the need for more agile support services to meet the needs of these forecasted cohorts of individuals effectively. It is likely there will an increase in the complexity of care needs as evidenced by other demographics.

There are four Extra Care provisions NNC commission care and support within: Imperial Court (Rushen), Sunley Court (Kettering), Rosewood Court (Wellingborough) and Carey Street (inclusive of both Wrights and Park Court) (Kettering)

### **Mapping provision verses need**

Challenges with our existing schemes:

- Schemes are often not located where forecasted numbers of older people live
- There is currently still limited alternative housing choice for people seeking independent living in older age
- Extra Care schemes have not been designed considering the environmental benefits for all representative groups of older people; i.e. those with dementia, sensory impairment, autism etc.
- Some older supported housing stock does not fit with modern standards of living or be suitable for meeting needs across the area.

NNC’s 10-year accommodation plan will reflect the Council’s commitment to providing housing solutions that empower the residents of North Northamptonshire to embark on a journey of well-being, enriched living, and graceful ageing.

Furthermore, national factors, such as post covid recovery and workforce challenges in social care, impacting the local approach will be addressed in the future Framework for Care and Support provision. Emphasis of the positive equality impact of increasing Extra Care housing availability and affordability for vulnerable community members, whilst acknowledging the requirement in meeting full inclusivity and diversity when considering ethnicity, linguistics, cultural support needs, and religious needs.

Market overview in line with forecasted ageing growth has identified estimated shortfall in extra-care housing in specific areas like Corby and areas of East Northants such as Thrapston / Raunds

Potential new developments shared with NNC are as follows:

| Area                           | No. of Units | Developer           | Partnered Care Provider | Forecasted timeline |
|--------------------------------|--------------|---------------------|-------------------------|---------------------|
| Oundle                         | 65           | Persimmon           | Housing 21              | By September 2025   |
| Wellingborough                 | 75           | Greatwell           | Not identified          | 2025                |
| Wellingborough (Stanton Cross) | 75           | Deeley Construction | Housing 21              | Not advised         |
| Wellingborough (Glenvale Park) | 53           | McCarthy Stone      | Not identified          | Not advised         |

**Commissioning Aspirations, Intentions, and Opportunities**

NNC's primary goal is to enable independent living for older individuals, providing timely community-based support to prevent hospitalisation or residential care and aiding in their return to independence following episodes of ill health. We aim to:

1. Increase the availability of lifelong general needs housing.
2. Offer personalised and flexible care for sustained independent living, even with increasing care needs.

We also aspire to provide quality, purpose-built independent living accommodation with onsite care (extra care / housing with care) for those who cannot stay in their homes. We aim to:

1. Develop a sufficient supply of independent living accommodation with onsite care (extra care) across various tenures.
2. Locate these facilities strategically to meet growing demand and promote active, independent living with access to health and wellbeing support.
3. Enhance physical and environmental standards in both existing and new older people's accommodation.

We recognise the importance of a skilled care workforce to deliver high-quality services and will collaborate with providers to attract, recruit, and retain such a workforce.

Key Objectives:

1. Work with housing developers to develop affordable extra care schemes offering various tenure types.
2. Share data with stakeholders and the housing and care sector to ensure developed accommodation aligns with demand.

The Independent Living settings (Extra Care) model aligns with the council's strategic approach to enhance well-being and prevent, reduce, delay, and meet individual and community needs. It provides a home for life, fostering a vibrant community where tenants support each other as their own neighbourhood.

NNC aims to encourage more individuals to consider Independent Living schemes as an alternative to residential care. NNC plan to support people with higher care and support needs to move into these types of housing at the right time.

To achieve these objectives, we will closely collaborate with essential partners, prioritise evidence-based strategies, enhance access to housing, and leverage technology to provide tailored support. Additionally, we aim to contribute to the effective management of housing demand in North Northamptonshire.

The new framework will align with North Northamptonshire's regeneration plans, with a strong emphasis on new housing solutions equipped with care and support services.

### **Link to other strategies**

This proposal will be aligned to the forthcoming Adult Social Care Strategy and NNC Housing / Accommodation Strategy for those with care and support and the Council's strategic objectives.

### **Views of residents**

A Public Survey was made available during the month of July through the NNC website. The target audience was any individual residing in North Northamptonshire aged 50 years and over. The online information included a definition of an Independent Living Scheme and a set of questions for completion.

The information was also produced in an accessible format.

Support was made available to individuals who required assistance to complete the survey.

Surveys were also sent by post to all individuals over 50 years old in receipt of an NNC Direct Payment.

85 usable responses were received, of which:

42 people were aged 50-64

30 people aged 65-84

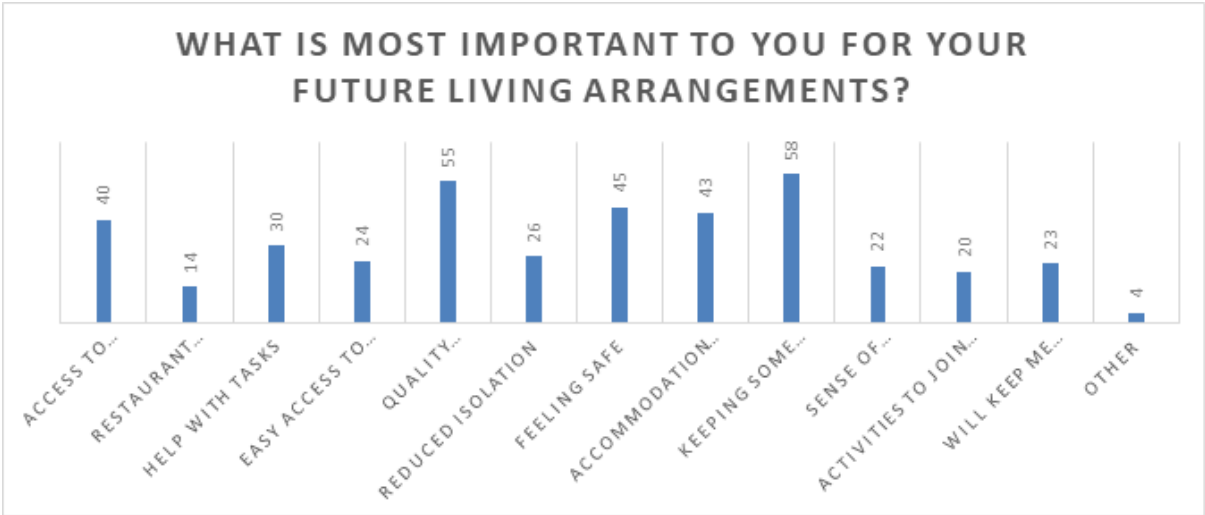
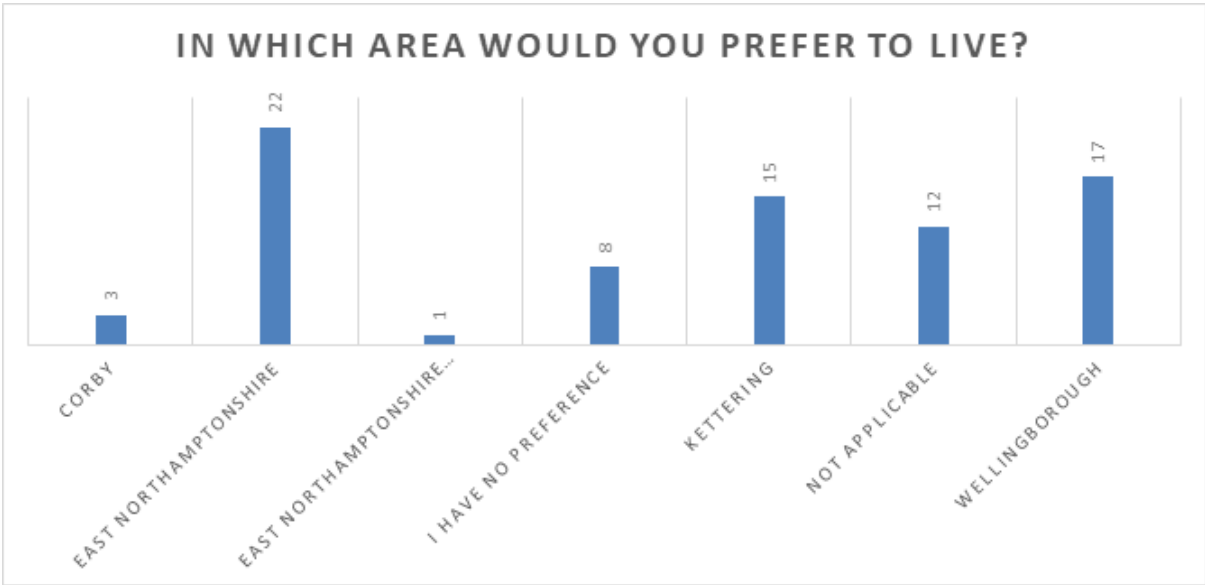
3 people were aged 85+

10 people did not give a response

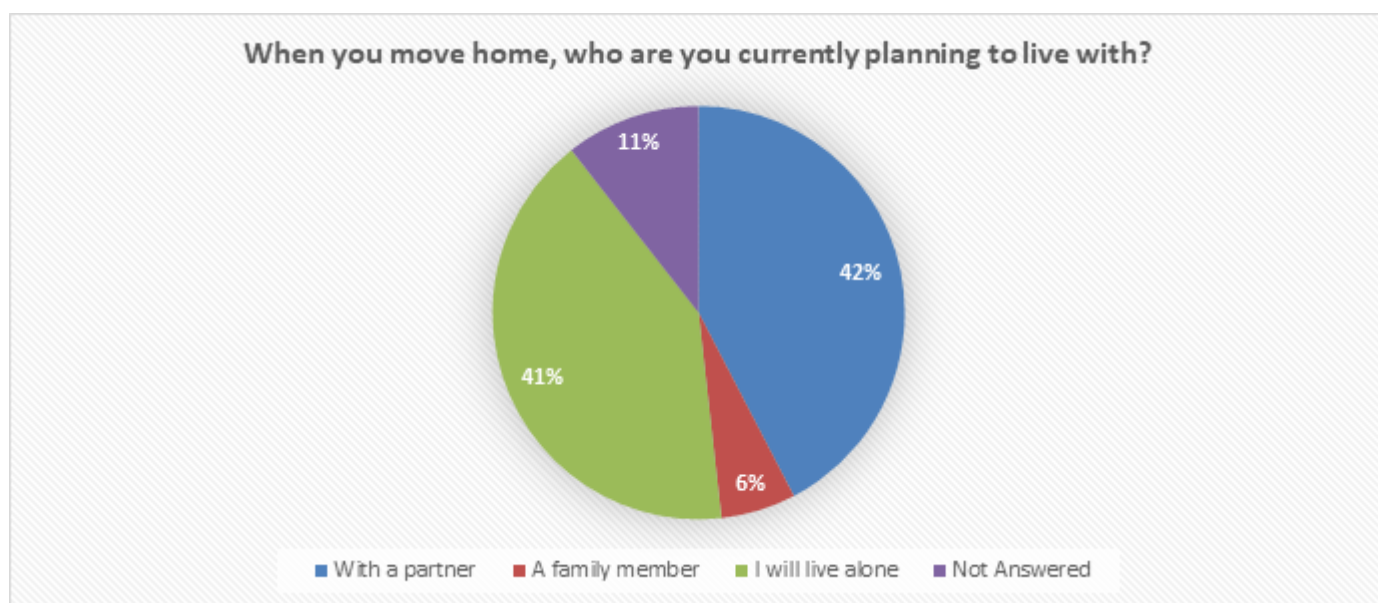
Of those who replied:  
 6 people said they were looking to move in the next 1-2 years  
 5 people in the next 5 years,  
 6 people in the next 10 years.  
 48 people were not planning on moving  
 20 were unsure or gave no answer.

When asked whether people would consider an Independent Living scheme as an option, 36 (42%) said they would be interested in such a scheme.

A summary of some of the feedback of is presented as follows:



| Factors that may deter me from moving into a scheme        | Total |
|--|-------|
| Don't want to leave my home                                | 45    |
| Don't want to leave my local community                     | 21    |
| Don't want to move away from friends                       | 19    |
| Not sure whether the scheme would be right for me          | 29    |
| Not having my own private garden or outdoor space          | 40    |
| Losing independence and having less control over what I do | 41    |
| Losing home comforts                                       | 25    |
| Loneliness of isolation                                    | 4     |
| Unfamiliar environment                                     | 14    |
| Everyone around the same age                               | 14    |
| Environment doesn't meet my needs                          | 16    |
| Affordability  | 44    |
| Other  | 7     |



### Additionally

A further survey was offered to all tenants within 2 of the existing schemes across North Northamptonshire for completion, regardless of whether they self-funded their care and support or it was a commissioned service.

28 responses were received.

Key factors of importance in residing within the scheme were unanimously:

- Feeling part of a community, having friends as neighbours, companionship and company
- Living in a safe and secure environment
- Knowing that my well-being is being monitored on a daily basis
-



When asked “**Do you think you will ever leave the scheme?**” responses included:

- I would like to end my life here
- Only in a pine box!!!
- Only in my coffin
- When I depart this earth.
- I won't ever leave. I couldn't wait to come back from hospital

Other comments when asked “**What is the most important thing living here offers you?**”:

- Still able to lead an active life
- Privacy in my flat, company when I need it
- I'm very happy here, it's the best thing I ever did!
- I feel part of a large family
- Independence
- Night staff around

When asked “**is there anything you feel would enhance living here?**”:

- Having a nurse available (blood pressure checks etc)

## **Options Appraisal**

The following options have been looked as part of this proposal:

**Option 1:** Maintaining the Status Quo.

Choosing to take no action is not a viable option because the existing contract is set to expire on 31 March 2024, which would result in a gap in statutory provision. While placements can still be arranged with providers, it's worth noting that such arrangements on spot purchase may come at a higher cost. An alternative would be to consider placing individuals in residential placements, which would increase the cost.

**Option 2:** Recommission like for like Framework.

This is not recommended as the findings of the review of the Contract has identified high numbers of the Service categories as now obsolete.

**Option 3:** Split OP and WAA within CSSH and procure only Independent Living (Extra Care) Support at this time, excluding Supported Living.

Other elements of CSSH area already available within other Framework Contracts.

**Option 3 is recommended**, ensuring that we utilise the framework to enable flexible and cost-effective procurement of various accommodation-related care and support models, ensuring optimal value for the council.

## **Costs**

Soft market testing and engagement has taken place with providers of NNC's current Extra Care schemes as well as the wider Extra Care market in order to inform both

service and cost modelling but also to further ensure adequate appetite for the new framework.

Furthermore, extensive benchmarking has taken place with local authorities, locally and nationally, the **median** findings of rates were as follows:

**Table 1**

| Hourly rate for Social Care Act eligible needs | Weekly Core charge per person with commissioned care through LA |
|--|---|
| £20.57   | £46.69  |

NNC’s proposed costs were then further modelled in the following way:

1. Understanding the current charges being paid to existing scheme providers with an acknowledgement that one scheme (Carey Street) is receiving a core charge per individual of £68.88 per week - a significant outlier when considering national benchmarking. Two schemes operated by Extra Care Charitable Trust with outdated banding attributed rates were conversely outliers when considering their long financial viability.
2. Adopting a weekly core charge as being paid by NNC to the Care and Support provider alongside any individual assessed hours from Care and Support plan (only those that fall outside of the support already offered as a condition of living in the scheme) paid at the identified hourly rate.
3. The weekly core charge will only be paid for individuals with commissioned care within Independent Living schemes. Those self-funding within the scheme will pay this core charge through their tenancy agreement directly with the Housing Provider or Care Provider as they have agreed. In one scheme Imperial Court NNC pay £60k per annum presently to cover all tenants of the scheme for waking night / emergency response regardless of whether they have assessed care needs and / or fund these themselves.

Therefore the weekly core charge recommended under this business case of £42.77 is made up of:

1. A percentage; i.e. a scheme of 45 apartments would be 1/45<sup>th</sup> and a scheme of 65 apartments would be 1/65<sup>th</sup> of the waking night cost
2. A contribution towards a 5% void occupancy assumption to support & sustain the service
3. One hour per person per week additional funding to cover unplanned care (floating support)

Furthermore £19.18 has been modelled within this Framework as the recommended hourly rate (lower than the benchmarked average identified above **Table 1** by £1.39). This has been modelled using the Fair Cost of Care findings from mandated Homecare 18+ exercise with removal of elements linked to staff travel and associated costs and ensuring that NI and pension contributions are factored in.

**In summary:**

**The proposed rates for NNC's new Framework April 2024 are identified as:**

|  |  |
|--|--|
| Hourly rate for Social Care Act eligible needs | Weekly Core charge per person with commissioned care through NNC |
| £19.18*  | £42.77*  |

\*Noted as lower than benchmarked average figures in **Table 1**

This suggested new pricing schedule is shown in **appendix i)**. The additional investment would be £42K. The current contract value in total for this contract is £551K. This £42K would be a new pressure on the current draft MTFP.

This investment will ensure long term savings for the Council, and takes into account:

1. By not securing framework rates before contract expiry, the rates demanded by existing Providers for 57 individuals on 1<sup>st</sup> April 2024 are likely to exceed £42k for 2024-25 as these packages would need to be negotiated on spot purchase agreements.
2. By locking in rates within the framework the Council is able to financially forecast robustly for those current schemes over the contract lifetime and furthermore ensure any new schemes built under the contract lifetime remain financially affordable.
3. Should an Extra Care scheme not be negotiated, these individuals would be likely to require placements in higher levels of formal care such as residential care homes at Expected to Pay rates (for 2023-24) as per table below:

Example:

| Care Package Type                         | Weekly Cost |
|---|-------------|
| Residential EPR (Standard)                | £655        |
| Residential EPR (Enhanced)- Dementia      | £742        |
| Average Community Care package *          | £345        |
| Extra Care inclusive of rent (£358 +£201) | £559        |

\*= taken from commitment report 6.10.23

| Extra care costs break down | Weekly cost |
|-----------------------------|-------------|
| Rent                        | £133        |
| Amenities charge            | £20         |
| Service Charge              | £162        |
| Core charge                 | £42         |
| <b>Total</b>                | <b>£357</b> |

|  |         |
|--|---------|
| In Extra Care - weekly care charges average 10.5 hours @£19.18 | £201.39 |
|--|---------|

Based on the above assumptions (excluding the working age adults residing currently in Extra Care schemes) and considering the 27 Older people currently placed in Independent Living schemes, the additional investment of £42k per annum would ensure the following cost avoidance figures can be made:

|                                   | <b>In Residential EPR home</b> | <b>In Independent Living setting</b> | <b>Cost avoidance amount per annum</b> |
|-----------------------------------|--------------------------------|--------------------------------------|--|
| Per annum cost for 1 older person | £34,060                        | £29,097                              | £4,962                                 |
| Total for 27 current older people | £919,620                       | £785,636                             | £133,983                               |

**Benefits of Proceeding with the procurement of the service**

This proposal offers several compelling benefits for the Council, emphasising the advantages of moving forward with the re-procurement of the Extra Care service:

1. Approving this proposal ensures there is no significant interruption in the delivery of this critical service. It safeguards the Council from any breach of its statutory duties.
2. By giving ample time to collaborate with service providers, NNC can proactively assess and secure the necessary capacity within the market to meet service needs effectively, well in advance of the contract's expiration.
3. Re-procurement enables the Council to address the complex and demanding requirements of vulnerable individuals in a cost-effective manner. This approach avoids potentially higher expenditure associated with placing individuals in residential care homes and ensuring a move away from high weekly core charges, thereby optimising the use of Council resources.
4. Re-procuring the service allows the Council to tailor care and support to the unique needs of vulnerable people, enhancing the potential for improved outcomes and better quality of life for those served.

**Risks Associated with Not Approving this Business Case:**

1. Failing to approve this business case poses a significant risk for NNC, as it could result in a gap in statutory provision. This, in turn, may lead to potential legal repercussions for the Council
2. Failing to receive approval of this business case could find the Council with increased expenditure on care and support by the necessity to negotiate rates outside of a Contract Framework with the 2 Providers currently supporting 57 individuals.
3. Equally failing to approve this business case could similarly find the Council with increased expenditure on care and support, particularly if individuals were placed in alternative provisions such as residential care. This additional cost could adversely affect the MTFP

4. A failure to secure the necessary services could impact on the Council's reputation. It may negatively impact the individuals who rely on these services, potentially leading to public dissatisfaction and loss of trust.
5. Operating without a valid contract exposes the Council to legal risks. Spot arrangements can be costly and may not align with legal and regulatory requirements, potentially resulting in legal disputes and liabilities for the Council.
6. Handling reviews following contract expiration, if required, placing a heavy burden on NNC officers. This resource-intensive process could strain the Council's capacity to deliver services effectively.

### **Delivery and planning**

Strategic commissioning activity will continue to inform the Council over the next decade, ensuring reviewing is undertaken to support effective business planning.

The following actions will take place:

- Delivery opportunities and partnerships to create innovative Independent Living options supported by outstanding quality of care and support
- Establish an evidence base for integrating health, social care and housing commissioning on future schemes under the framework agreement that delivers economies of scale, promotes a variety of placement and support options and delivers best value

### **Governance**

Monitoring the governance for our delivery will include reporting after SLT to CLT and Executive Committee, to ensure the ongoing required sign offs.

### **Appendix i)**

#### **Payments and scheme differences**

The current Extra Care schemes all operate differently under their individual agreements, summary as follows.

| <b>Scheme</b>                 | <b>Type of Rate</b> | <b>Old Rate</b>   | <b>New Rate</b> | <b>Change</b> | <b>%Change</b> |
|-------------------------------|---------------------|---|-----------------|---------------|----------------|
| Rosewood Court & Sunley Court | Waking night        | Bandings used so not comparable as includes night & day support |                 |               |                |
|                               | Weekly Core charge  | N/A   | £42.77          |               |                |
|                               | Hourly rate         | N/A   | £19.18          |               |                |

|                |                    |                           |                       |          |      |
|----------------|--------------------|---------------------------|-----------------------|----------|------|
| Imperial Court | Waking night       | £1163 weekly whole scheme |                       | -649.76  | -56% |
|                | Weekly Core Charge | N/A                       | £42.77 @12 NNC funded | As above |      |
|                | Hourly Rate        | £18.47                    | £19.18                | +0.71    | +4%  |
| Carey Street   | Waking night       | N/A                       |                       |          |      |
|                | Weekly Core Charge | £68.88                    | £42.77                | -26.11   | -38% |
|                | Hourly Rate        | £18.47                    | £19.18                | +0.71    | +4%  |

# Review of Care and Support in Specialist Housing

## **Useful information**

- Report authors: Rachel White, Fiona Steinhardt
- Author contact details: [Rachel.White@northnorthants.gov.uk](mailto:Rachel.White@northnorthants.gov.uk) ,  
[Fiona.Steinhardt@northnorthants.gov.uk](mailto:Fiona.Steinhardt@northnorthants.gov.uk);
- Report version number: v01

## Summary

The current contract for Care and Support in Specialist Housing (CSSH) ends on 31/03/2024.

The framework was commissioned by Northamptonshire County Council (NCC). At the time of publishing the estimated countywide contract value was £38.75 million

The current value for North Northamptonshire Council is £551,787.68 per annum.

## Background and Context

The Care and Support in Specialist Housing commenced in April 2019. The key objective being to develop independent living, while reducing the numbers of residential/nursing care placements being agreed through the care pathway.

It covers the provision of care and support for people of all ages (from 18 years) and all needs, up to and including palliative and end of life care. Service categories include:

1. Older People personal care and support
2. Mental Health
3. Learning Disability
4. Learning Disability – Highly Complex
5. Autism
6. Physical Disability
7. Dementia
8. Nursing (Level 3 nursing tasks)

In 2020 the Commissioning for a Good Life (C4GL) Framework for individuals with learning disabilities superseded the CSSH Framework. Categories 3 and 4 at this time became dormant.

The contract stipulates that the council will work in partnership with what was district and borough councils, housing associations and private sector partners to develop accommodation, to be used in conjunction with this framework for care and support.

The umbrella term of 'Care and Support in Specialist Housing' (CSSH) encompasses a range of accommodation with support options which include:

**Extra Care (EC) housing** - defined as specialist accommodation designed to maximise the independence of older adults by providing a safe, secure and stimulating environment. Customers retain the independence of having their own tenancy or home and at the same time benefit from the availability of around the clock social care and support.



**Supported Living (SL) Accommodation** - defined as accommodation designed to maximise the independence of younger adults including people with Learning Disabilities, Mental Health needs and Physical Disabilities by providing a safe, secure and stimulating environment where individuals have their own tenancy or home, living space and receive support to meet their individual needs.

**Very Sheltered Housing** - defined as offering support within a purpose-built accommodation that does not have 24 hour support.

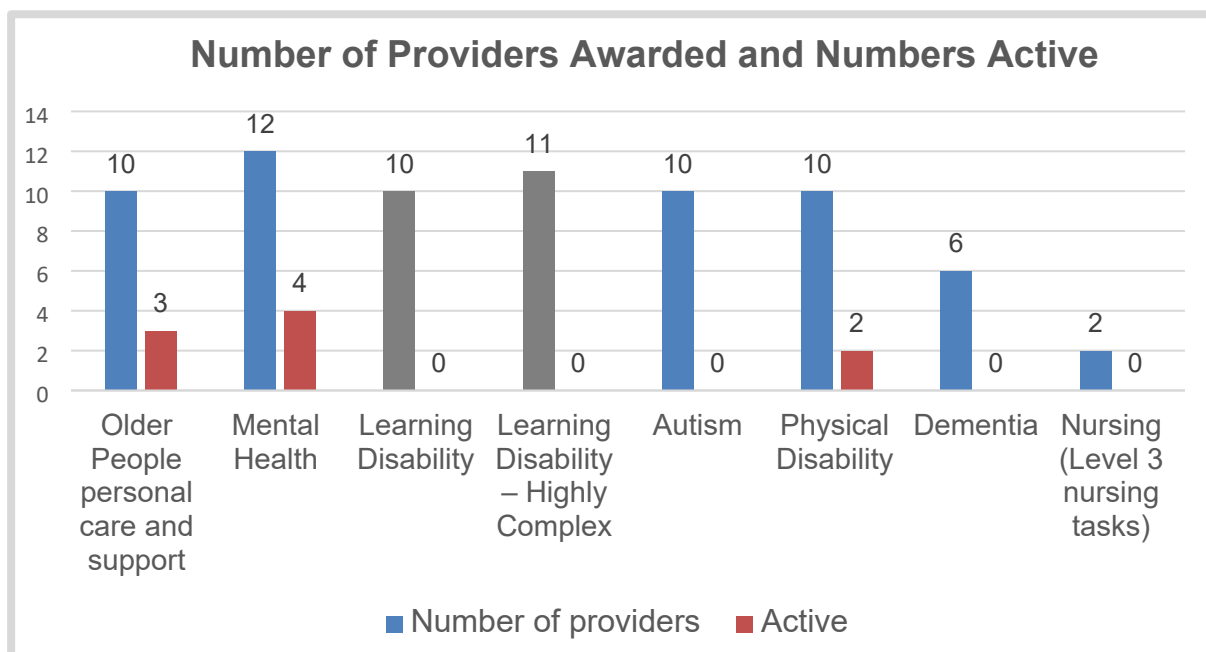
## **The Key Objectives**

- To develop or sustain Customers' capacity to live independently within the community; enabling people to retain skills and develop new skills, reducing reliance on services and carers.
- To reduce the number of people entering residential or nursing care homes and enable people to move from care homes to a community setting, where appropriate.
- To reduce the number of emergencies amongst people living independently, which might result in more intensive services being required.
- To reduce the number of emergency admissions to hospital and reduce repeated readmission.
- To increase the number of people able to remain in the community setting of their choice.
- To reduce the likelihood of Customers losing their homes.
- To facilitate timely and safe discharge from hospital.
- To provide support to carers.
- To maximise the number of people who are supported to participate in community activities; and
- To facilitate and assist communication between the Customer and the Housing Provider.

## **Overview of Current Contract**

The graph below provides details of the number of providers awarded under each of the 8 groups. It was intended that the top 10 scoring providers be awarded.

For both dementia and nursing the lower numbers awarded reflect the initial interest and bids.



There are 9 providers currently active in three of the categories; older persons, mental health and physical disabilities. Whilst the two learning disability categories are detailed, both became dormant in January 2020 when the Commissioning for a Good Life Framework (C4GL) commenced.

## Extra Care

### Older Persons

There are currently 65,357 people over the age of 65 residing in North Northamptonshire equating to 18.1% of the unitary's population made up in the following way;

| Age                    | Population | Percentage |
|------------------------|------------|------------|
| Aged 65 to 74 years    | 36,408     | 10.1       |
| Aged 75 to 84 years    | 21,326     | 5.9        |
| Aged 85 years and over | 7,623      | 2.1        |

The geographical location of 65's and numbers are as follows:

| Area                 | Number of 65+ |
|----------------------|---------------|
| Corby                | 10,551        |
| East Northants Rural | 6,443         |
| East Northants Urban | 13,423        |

|                      |        |
|----------------------|--------|
| Kettering Rural      | 5,449  |
| Kettering Urban      | 13,901 |
| Wellingborough Rural | 4,948  |
| Wellingborough Urban | 10,642 |

There has been rapid growth in older populations in the last 5 years. Numbers of over 80's have doubled in the last 20 years. The older population is expected to grow by a further 51% by 2040.

| Age Band | Increase % in number forecasted at 2040 |
|----------|---|
| 90+      | 124%                                    |
| 85-89    | 91%                                     |
| 80-84    | 70.6%                                   |
| 75-79    | 65.2%                                   |
| 70-74    | 28.7%                                   |
| 65-69    | 34.6%                                   |

There are currently 27 individuals aged over 65 receiving a commissioned service within Extra Care settings.

The four Extra care schemes below fall under the current CSSH contract:

| Name of Scheme | Landlord                    | Care & Support Provider     | Located in     |
|----------------|-----------------------------|-----------------------------|----------------|
| Rosewood Court | Extra Care Charitable Trust | Extra Care Charitable Trust | Wellingborough |
| Sunley Court   | Extra Care Charitable Trust | Extra Care Charitable Trust | Kettering      |
| Imperial Court | Midland Heart               | East Midlands Housing (EMH) | Rushden        |
| Carey Street** | East Midlands Housing (EMH) | East Midlands Housing (EMH) | Kettering      |

\*\* Scheme moving from Extra Care scheme to Intensive Housing Management model

There is no Extra Care provision within Corby at this time. Commissioners have been made aware there are plans for the development of 3 new Extra care schemes in the Unitary as follows:

| Area of planned scheme       | Housing Provider | Proposed scheme size | Proposed opening date |
|------------------------------|------------------|----------------------|-----------------------|
| Oundle                       | Housing 21       | 65 apartments/flats  | January 2025          |
| Wellingborough-Stanton Cross | Housing 21       | 65 apartments/flats  | Not yet known         |
| Wellingborough-Glenvale Park | McCarthy Stone   | 56 apartments/flats  | Not yet known         |

There is further redevelopment of an existing sheltered housing scheme in Wellingborough (Hearndon Court) into an Extra Care scheme by Greatwell Homes, it is intended this will consist of 75 apartments/flats and provisional timescales indicate a completion of the end of 2025

Current Extra care provision has not been purpose built for individuals living with dementia. Early discussions have commenced with Health colleagues and representatives of ICB's Dementia brick regarding developing good practice design guidance for Housing developers for future schemes.

Commissioners are in current consultation with EMH surrounding the scheme at Carey Street and a proposal surrounding a change in model to Intensive Management Support only. Those still requiring day time care and support would require this to be delivered by external Homecare agencies as opposed to an inhouse care team should this model be adopted.

### Payments and scheme differences

The current Extra Care schemes all operate differently under their individual agreements, summary as follows;

| Scheme                        | Hourly Rate  | Weekly Core Cost                     | Waking night Cost                     |
|-------------------------------|--|--------------------------------------|---------------------------------------|
| Rosewood Court-Wellingborough | No hourly rate- individuals are assessed as having care and support needs within one of three tiers:<br><br>Level 3 (11-15.5 hours) <b>£95.49</b><br><br>Level 4 (16-22.5 hours) £143.20 | N/A-Included within the level charge | N/A- Included within the level charge |

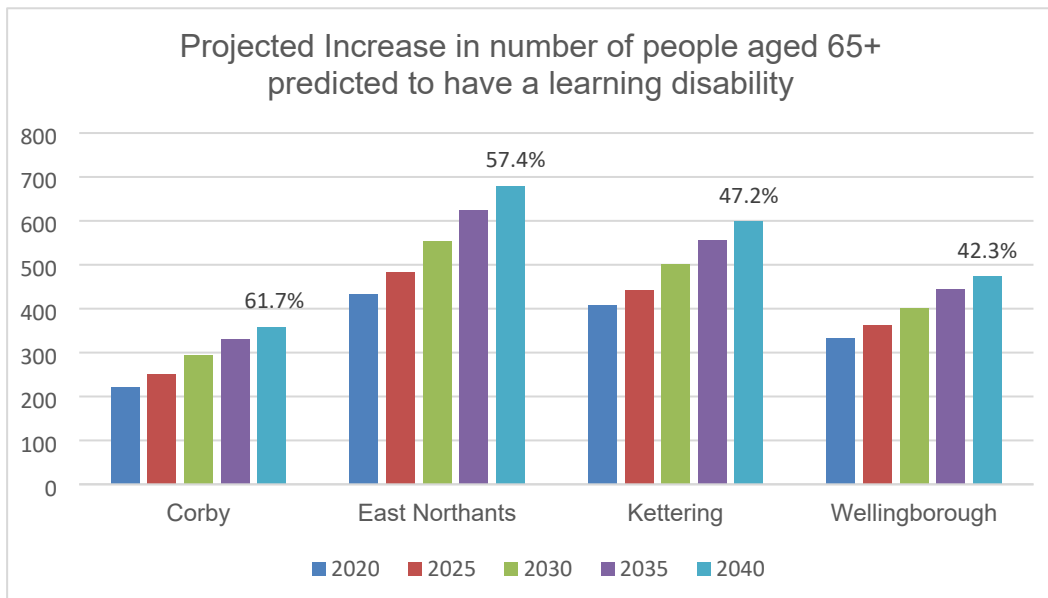
|                        |  |                            |  |
|------------------------|--|----------------------------|--|
|                        | Level 5 (23-33.5 hours) <b>£234.94</b> |                            |  |
| Sunley Court-Kettering | As above                               | As above                   | As above   |
| Imperial Court-Rushden | £18.47                                 | N/A                        | £166.23 per night<br>(NNC currently block pay this at annual cost of £60,673.95) |
| Carey Street-Kettering | £18.47                                 | £68.88 per person per week | N/A- Included within the core charge   |

On benchmarking and analysis of the current schemes and associated costs, it has been identified that:

1. Carey Street does not fully meet its objectives and fulfil the remit of Extra Care living. Voids have become costly for EMH and in addition the core charge paid by NNC is an outlier at significant high cost
2. The 2 schemes managed and delivered by Extra Care Charitable Trust's tiering rates are delivering care and support significantly lower than hourly rate comparables. They are noted to be outliers at extremely low cost.
3. NNC pay a block for the whole funding of a waking night staff member at Imperial Court not a proportion of this cost in association for those with NNC commissioned care and support needs only within the scheme.
4. People who reside in Corby and far-reaching parts of East Northants do not, at this time, have any alternatives to residential care home settings.
5. NNC need to raise awareness of Extra care settings (both internally and externally) and the benefits of these to older people at the right time, so as to act as a preventative model rather than a reactive one
6. NNC need to work with developers offering desired build types and specifications to meet individuals needs long term
7. The term Extra Care through consultation is considered outdated and not strengths based, the preferred term to refer to these schemes moving forward will be Independent Living Schemes (with care and support available on site)

### Learning Disabilities

The 2021 census projects there to be a 52% increase in the number of individuals with learning disabilities in the next 20 years. In terms of numbers this amounts to an additional 718 people.



There are currently 118 individuals with learning disabilities aged 65 and above receiving a commissioned service. With an additional 147 individuals between the age of 55 and 64.

| Service Type     | Number of Packages (aged 55 – 64) | Number of Packages (aged 65+) |
|------------------|-----------------------------------|-------------------------------|
| Direct Payment   | 26                                | 26                            |
| Support at Home  | 24                                | 20                            |
| Residential      | 3                                 | 34                            |
| Supported Living | 69                                | 37                            |
| Shared Lives     | 5                                 | 6                             |
| Day Support      | 66                                | 23                            |

### Autism

There are currently 627 people within North Northamptonshire aged 65 and over who are autistic. Based on the 2021 Census, there is a projected increase of 51.5% in the number of individuals aged 65+ by 2040.

| Location       | Increase % in number forecasted at 2040 |
|----------------|---|
| Corby          | 59.18%                                  |
| East Northants | 56.12%                                  |
| Kettering      | 48.09%                                  |
| Wellingborough | 44.00%                                  |

Extra Care enables individuals to remain independent for longer and can be a positive next step for those currently living within the community. Advantages include:

- staying independent for longer
- own living space
- help being available in an emergency
- flexible care and support

Research indicates positive and improved outcomes for people which include general wellbeing, social interaction and confidence.

For ageing younger adults, it is recognised that there are barriers to this type of support model.

A) minimum age of 55 - individuals with learning disabilities can age more quickly than the general population and with this may develop specific health needs such as early onset dementia.

B) individuals who have lived in their own home or in a shared or family setting can find an extra care scheme over whelming both in terms of size and model design - single flats, limited communal space

C) staff teams within extra care settings traditionally provide generic domiciliary support to those over the age of 55. More specialist training would be required to meet the needs of those who have learning disabilities, early onset dementia, dementia.

D) where individuals haven't the right support or environment it can be disruptive for other individuals living within the scheme.

### Supported Living

Framework providers currently support 18 people within 7 supported living settings.

The table below shows a breakdown of those supported under categories 2, 5 and 6 (Mental Health, Autism, Physical Disabilities)

| Provider | Number of People Supported | Number with PSR Autism | Number with PSR MH | Number with MH & PD | Number with PD | Number other |
|----------|----------------------------|------------------------|--------------------|---------------------|----------------|--------------|
| Advance  | 3                          | 0                      | 3                  |                     |                |              |
| Creative | 4                          | 2                      | 1                  | 1                   |                |              |
| EMH      | 11                         | 2                      | 1                  | 5                   | 2              | 1            |

In addition to the CSSH the following frameworks also include supported living:

**Commissioning for a Good Life Framework (C4GL)** – for individuals with learning disabilities. Due to end January 2025. A review is currently in progress.

**Any Qualified Provider (AQP)** - for individuals with Mental Health needs including Autism.

There are a total of 425 people currently living within a supported living arrangement. 66% of these individuals have a learning disability and have their needs met through the Commissioning for a Good Life Framework. Working Age Adults who don't have a learning disability make up the remaining 34% of the total. 4% of these individuals have a supported living arrangement via the CSSH Framework and the remaining 30% via the AQP or spot arrangements.

| Supported Living Placement   | Total Number |
|--|--------------|
| Learning Disabilities  | 280          |
| Inclusions – including Mental Health, Autism and Physical Disabilities | 145          |

## Engagement

All Contracted Providers under the CSSH framework were invited to a recent forum to offer feedback on the current contract from their perspective and to start dialogue on requirements for future commissioning of the provision.

Attendance was disappointingly low, however follow up slides offered a further opportunity for Providers to engage outside of this event.

This feedback supported a preference to divide cohorts (older persons and working age adults) in future commissioning activity.

Current users of Extra Care schemes have been invited to participate in supplying feedback on their current care and support provision via a survey, in order to help inform new specification development. This data is currently awaiting return.

## Recommendations

1. To commission a framework for Care and Support provision within Independent Living settings (e.g. Extra Care)
2. Ensure the specification offers flexibility in relation to minimum age requirements



3. Incorporate into the specification the potential for these schemes to design and offer accommodation and support that meets the needs of those requiring more specialised support (i.e. those with learning disabilities, mental and physical Health needs and those with dementia and sensory impairments)
4. NNC need to raise awareness of Independent Living schemes (both internally and externally) and the benefits of these to older people at the right time, so as to act as a preventative model rather than a reactive one
5. Complete a deep dive of the data to understand the current living arrangements of working age adults aged 55 plus and project future need.
6. To avoid duplication and confusion, supported living should be incorporated into other framework recommissioning arrangements e.g.: C4GL. This will provide one contract for supported living for each of the cohorts, incorporating housing requirements and expectations.
7. NNC need to work with developers offering desired build types and specifications to meet individuals needs long term
8. To work with housing colleagues and providers to understand current accommodation arrangements and appraise future options as part of this recommissioning.
9. Ongoing engagement with all residents of North Northamptonshire via a Council Public survey as we work through the recommissioning. Furthermore, specialist engagement and inclusive documentation to support this to be carried out by commissioners.

## Conclusion

The current contract for the CSSH Framework ends on 31/03/2024.

This Framework has not delivered the volume of specialised support arrangements as was originally intended. The data confirms that there are at the time of review 52 packages of support, with a contract value of £551,787.68 per annum. The original award (although a county wide tender) indicated an expected greater uptake of support under this Contract.

We may assume that the impact of both COVID and a Unitary split immediately following Contract start date may have impacted on the delivery under this Contract. Likewise the move to an alternative Framework arrangement for adults with learning disabilities will have been a contributing factor.

Having conducted this review and completed an options appraisal (Appendix C) it is recommended that NNC re procure specialist housing arrangements separately rather than combined under one single framework.

For Extra Care, (to be referred to hereafter as Independent Living) this will be re commissioned with a contract award date of 01/04/2024. For Supported Living, the intention is to meet the need for care and support in specialist housing through the recommissioning of other existing frameworks.

Future commissioning activity will allow for a fuller review and will include more detailed market and tenant engagement to co-produce and shape future offers.

## Appendix C- Benchmarking and Cost Modelling

| 2023-2024 Rates                  | Hourly Rate   | Weekly ***Core Charge | Waking night   |
|----------------------------------|---------------|-----------------------|----------------|
| <b>Local Authority 1 schemes</b> | £23.84        | N/A                   | £171.23        |
|                                  | £21.14        | N/A                   | £185.99        |
|                                  | £19.46        | N/A                   | £175.17        |
|                                  | £19.19        | £25                   | N/A            |
|                                  | £20.73        | N/A                   | £186.56        |
| <b>Local Authority 2 schemes</b> | £20.13        | N/A                   | £181.17        |
|                                  | £20.81        | N/A                   | £187.29        |
| <b>Local Authority 3 schemes</b> | £21.28        | £46.35                | N/A            |
|                                  | £20.49        | £47.16                | N/A            |
|                                  | £21.28        | £46.35                | N/A            |
|                                  | £20.49        | £43.59                | N/A            |
|                                  | £21.57        | £50.00                | N/A            |
| <b>Local Authority 4 schemes</b> | £18.23        | N/A                   | £164.07        |
|                                  | £19.40        | N/A                   | £174.60        |
| <b>Mean Values</b>               | <b>£20.57</b> | <b>£46.69</b>         | <b>£178.26</b> |

### NNC Proposed New Contract Rates from 1<sup>st</sup> April 2024

|            |               |               |            |
|------------|---------------|---------------|------------|
| <b>NNC</b> | <b>£19.18</b> | <b>£42.77</b> | <b>N/A</b> |
|------------|---------------|---------------|------------|

\*\* Weekly core charge is paid by NNC to Care and Support Provider alongside individual assessed hours from Care and support plan paid at identified hourly rate.

Weekly core charge is only paid for individuals with commissioned care within Independent Living schemes. This weekly charge paid is made up of:

1. A percentage - i.e. a scheme of 45 apartments would be 1/45<sup>th</sup> and a scheme of 65 apartments would be 1/65<sup>th</sup> of the waking night cost
2. A contribution towards a 5% void occupancy assumption to support & sustain the service
3. One hour per person per week additional funding to cover unplanned care (floating support)

4. £19.18 is the current hourly rate and is likely to increase from 1<sup>st</sup> April in line with National Minimum Wage. Similarly the Weekly Core Charge will increase if National Minimum wage increases.

## Appendix D: Options Appraisal

| Option  | Benefits   | Disadvantages   | Comments               |
|---|--|---|------------------------|
| 1. Recommission the CSSH Framework like for like            | <ul style="list-style-type: none"> <li>• Tight timeline, hence easier to produce like for like contract</li> </ul>   | <ul style="list-style-type: none"> <li>• Some of the service categories are obsolete- so like for like doesn't currently cover all areas</li> <li>• Feedback from Provider engagement the Framework is confusing particularly when there are other frameworks in place which are able to meet the same requirements</li> <li>• Lack of clarity around Housing partnership arrangements</li> </ul> | <b>Not recommended</b> |
| 2. Recommission the CSSH Framework but with some variations | <ul style="list-style-type: none"> <li>• We can make changes in response to lessons learnt from provider feedback and review of the framework</li> <li>• Can have a clear distinction around expected accommodation arrangements and support.</li> <li>• We can ensure that it covers the needs of all groups of individuals.</li> </ul> | <ul style="list-style-type: none"> <li>• Tight timescale for amendments</li> <li>• Could lead to confusion for Providers where other frameworks are already in place offering a similar remit.</li> <li>• Tendency for duplication of time and resources alongside the re-procurement of similar contracts</li> </ul>   | <b>Not recommended</b> |
| 3. Split OP and WAA under CSSH and tender for care and      | <ul style="list-style-type: none"> <li>• Can uniform payments rates</li> <li>• Can develop new</li> </ul>  | <ul style="list-style-type: none"> <li>• None identified</li> </ul>   | <b>Recommended</b>     |

|   |   |   |  |
|---|---|---|--|
| <p>support in Independent Living (Extra care) settings only</p>   | <p>collaborative specification</p> <ul style="list-style-type: none"> <li>• As over 55 provision will also be available for WAA should they prefer extra care housing</li> <li>• Clearer for Providers on expectation under a Contract</li> <li>• Allows care &amp; support in supported living to be considered more fully in its own merit</li> </ul>   |   |  |
| <p>4. Include care and support in specialist accommodation in the recommissioning of the Learning Disabilities Framework for supported living</p> | <ul style="list-style-type: none"> <li>• One framework that meets the overall need- i.e. no duplication</li> <li>• Gives clarity to the Provider market as to the specification they are working under.</li> <li>• Define housing expectations- partnerships with Housing Associations versus private landlords.</li> <li>• Potential to call off for specialised schemes as required.</li> <li>• Consistency of pricing structure</li> <li>• Consistency in terms of KPIs</li> </ul> | <ul style="list-style-type: none"> <li>• Limitations surrounding accommodation available</li> </ul> | <p>As part of the LD review consider having a tiered approach:<br/> Tier 1: care and support in specialist accommodation<br/> Tier 2: care and support</p> <p>The framework could have an option to add if required separate lots for Individuals who are Autistic</p> <p><b>Recommended</b></p> |

|  |  |  |  |
|--|--|--|--|
|  | <p>and measurables.</p> <ul style="list-style-type: none"> <li>• Helps with shaping availability within the market that matches need.</li> </ul> |  |  |
|--|--|--|--|

## APPENDIX E: Engagement

### 1. North Northamptonshire Public Survey Findings:

A Public Survey was made available during the month of July. The target audience was any individual residing in North Northamptonshire of the age of 50years and over. The online information included a definition of an Independent Living Scheme and a set of questions for completion. The information was also produced in an accessible format. Support was made available to individuals who required assistance to complete the survey. Surveys were also sent by post to all individuals over 50years in receipt of an NNC Direct Payment.

85 usable responses were received, of those:

- 42 people were aged 50-64
- 30 people aged 65-84
- 3 people were aged 85+
- 10 people did not give a response

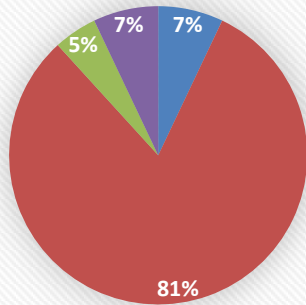
Of those who replied:

- 6 people said they were looking to move in the next 1-2years
- 5 people in the next 5years,
- 6 people in the next 10years.
- 48 people were not planning on moving
- 20 were unsure or gave no answer.

When asked whether people would consider an Independent Living scheme as an option- 36 (42%) said they would be interested in such a scheme.

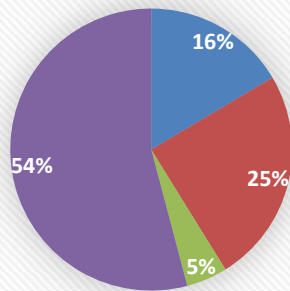
A summary of feedback of which is presented below:

### Who are you completing this survey on behalf of?



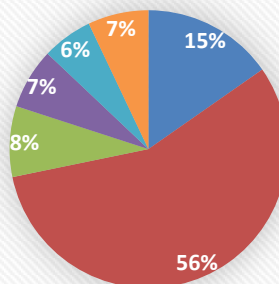
■ Family Member    ■ Myself  
■ Not Answered    ■ Someone I care for

### Before today were you aware of Independent Living Schemes?



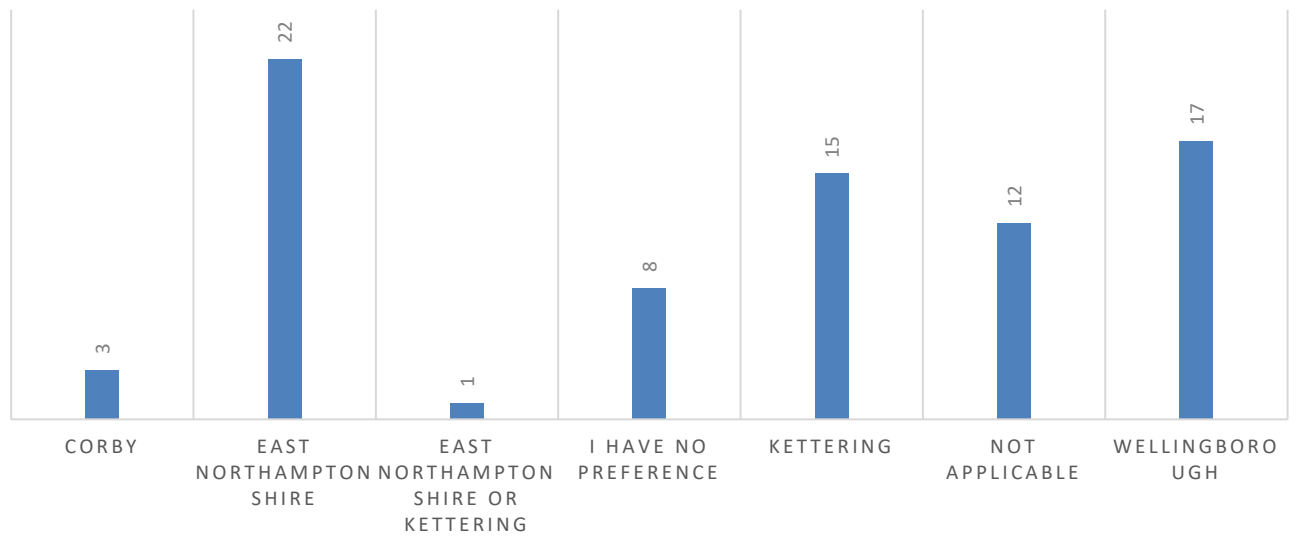
■ I'm not sure    ■ No    ■ Not Answered    ■ Yes

### Are you planning on moving from your current home in the next few years

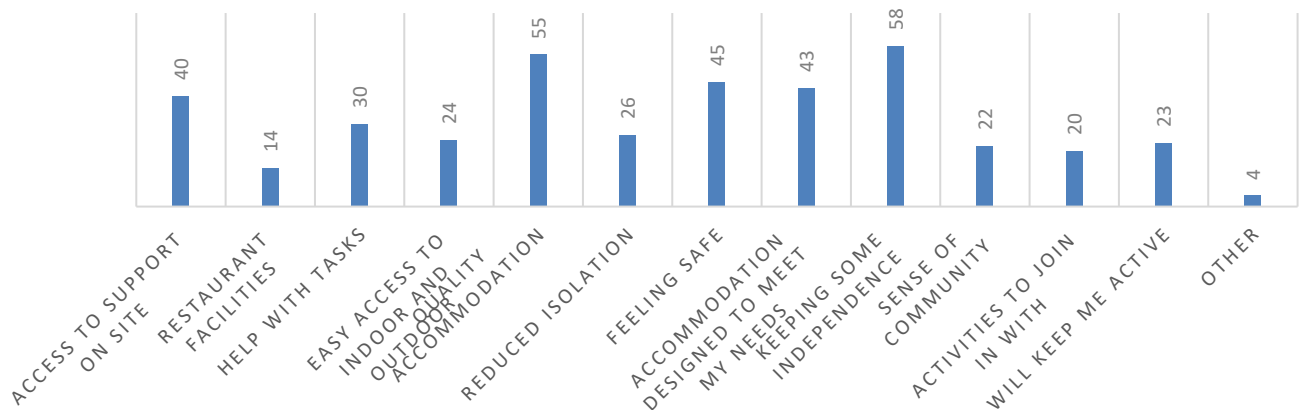


■ I'm not sure    ■ No, I have no current plans to move    ■ Not Answered  
■ Yes, in one to two years    ■ Yes, in the next 5 years    ■ Yes, in the next ten years

### IN WHICH AREA WOULD YOU PREFER TO LIVE?



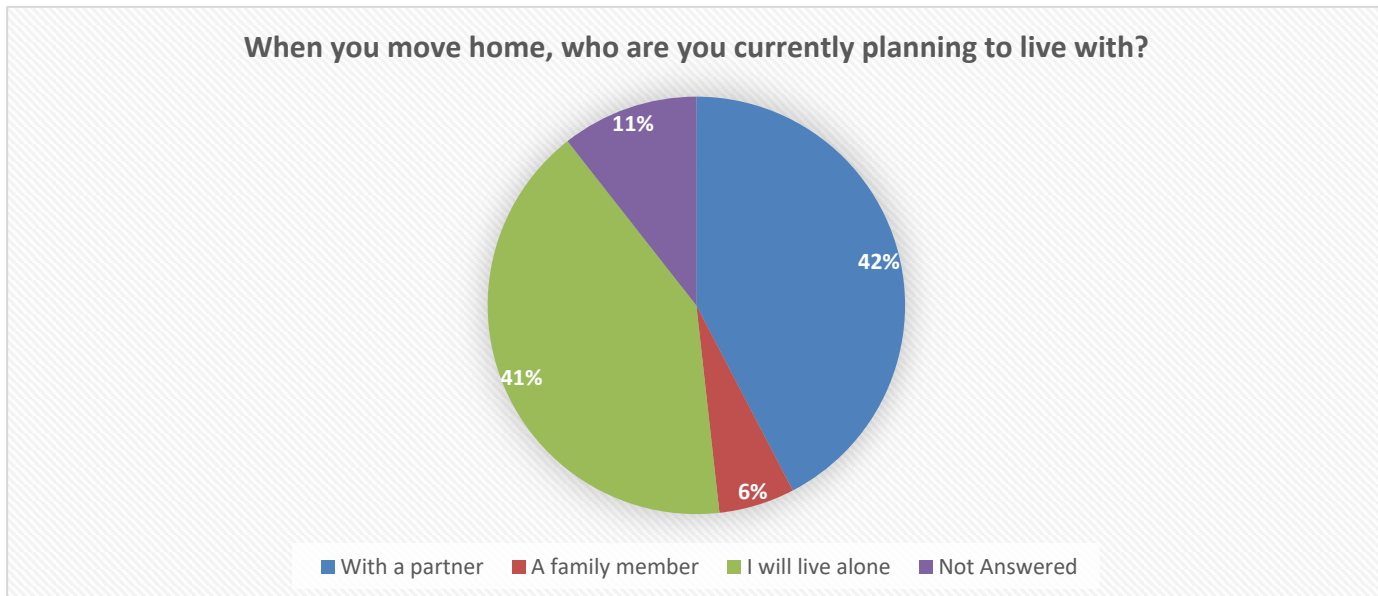
### WHAT IS MOST IMPORTANT TO YOU FOR YOUR FUTURE LIVING ARRANGEMENTS?



| Factors that may deter me from moving into a scheme        | Total |
|--|-------|
| Don't want to leave my home                                | 45    |
| Don't want to leave my local community                     | 21    |
| Don't want to move away from friends                       | 19    |
| Not sure whether the scheme would be right for me          | 29    |
| Not having my own private garden or outdoor space          | 40    |
| Losing independence and having less control over what I do | 41    |
| Losing home comforts                                       | 25    |
| Loneliness of isolation                                    | 4     |



|                                   |    |
|-----------------------------------|----|
| Unfamiliar environment            | 14 |
| Everyone around the same age      | 14 |
| Environment doesn't meet my needs | 16 |
| Affordability                     | 44 |
| Other                             | 7  |



## 2. Engagement with current individuals residing in North Northamptonshire’s schemes:

A survey was offered to all tenants within 2 of the existing schemes across North Northamptonshire for completion, regardless of whether they self-funded their care and support or it was a commissioned service.

28 responses were received.

Key factors of importance in residing within the scheme were unanimously:

- Feeling part of a community, having friends as neighbours, companionship and company
- Living in a safe and secure environment
- Knowing that my well-being is being monitored on a daily basis

When asked “**Do you think you will ever leave the scheme?**” responses included:

- I would like to end my life here
- Only in a pine box!!!
- Only in my coffin
- When I depart this earth.

- I won't ever leave- I couldn't wait to come back from hospital

Other comments when asked **“What is the most important thing living here offers you?”**:

- Still able to lead an active life
- Privacy in my flat, company when I need it
- I'm very happy here, it's the best thing I ever did!
- I feel part of a large family
- Independence
- Night staff around

When asked **“is there anything you feel would enhance living here?”**:

- Having a nurse available (blood pressure checks etc)

### **3. Engagement with Autism Enablers Group:**

A representative of the commissioning team was invited to Northamptonshire's monthly Autism Enablers group to present information on the re-procurement of Independent Living schemes.

There was opportunity to discuss scheme layouts and criteria for eligibility. Good open discussion around the environment and the need for reasonable adjustments to ensure comfortable living arrangements for autistic individuals took place. Members of the group were offered an opportunity to visit schemes to fully understand what they look and feel like. Furthermore, discussion centred around members of the group co-producing the design of new developments.

Individuals welcomed the discussion, and some were already aware of Independent Living schemes (Extra Care schemes) with some individuals expressing they would consider this as a housing option providing the environment was suitable for their needs.

Questions important to some individuals included the permission of bringing pets to reside with them at schemes and individual responsibilities as a tenant.

## EXECUTIVE 16<sup>th</sup> November 2023

|                      |  |
|----------------------|--|
| <b>Report Title</b>  | <b>Delivery of Household Waste Recycling Centres (HWRCs) from April 2025</b> |
| <b>Report Author</b> | Graeme Kane – Executive Director for Place & Economy (Interim)               |
| <b>Lead Member</b>   | Cllr Matt Binley, Executive Member for Highways, Travel and Assets           |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

**Appendix A** – HWRC Options Appraisal – SLR Consulting Ltd  
**Appendix B** – Equalities Screening Assessment

#### **1. Purpose of Report**

---

- 1.1. North Northamptonshire Council has reviewed the Household Waste Recycling Centre (HWRC) operations ahead of the current outsourced arrangements ending on 31<sup>st</sup> March 2025. This has identified the provision required from 1<sup>st</sup> April 2025 to maintain HWRC facilities for the residents of North Northamptonshire.
- 1.2. This report considers the outcome of the Council's HWRC Options Appraisal undertaken in summer 2023, which was a required outcome of the Waste Management 3-Year Plan 2022-25 approved by Executive in September 2022.
- 1.3. This report seeks agreement of the proposed operating model for HWRCs from 1<sup>st</sup> April 2025, and seeks approval for the Waste Management service to undertake necessary procurement activities to secure necessary contracts to support that operating model.

## **2. Executive Summary**

---

- 2.1. The Council has four Household Waste Recycling Centres (HWRCs) which are operated on a legacy Northamptonshire County Council contract which ends on 31<sup>st</sup> March 2025. As such the Council has been reviewing the HWRC operation and what is required from 1<sup>st</sup> April 2025 to meet the needs of North Northamptonshire residents.
- 2.2. In reviewing the operating model for services from 1<sup>st</sup> April 2025, the Waste Management team commissioned an Options Appraisal of the HWRC provision to advise on the future of the service. The Options Appraisal was undertaken by SLR Consulting in Summer 2023.
- 2.3. The Options Appraisal identified that the existing network capacity is acceptable based on current demand, with the HWRCs located within a good travel distance. However, the facilities themselves require immediate attention to enable them to utilise their footprint, allow them to maximise their waste collection and maintain customer satisfaction and to meet future demand.
- 2.4. The Options Appraisal also looked at the potential for bringing the Service in-house or maintaining an outsourced service. Based on the information available, the high-level modelling and assessment conducted, consideration given to timescales, internal resources, capability and indicative costs, it has been recommended that an outsourced service delivery model should continue to be the preferred approach to the next phase of service delivery.
- 2.5. The reasons identified for this recommendation are:
  - 2.5.1. Based on the options appraisal, there is insufficient time to put in place an in-house model by April 2025.
  - 2.5.2. An insourced service is likely to cost between 5-7% more per annum than an outsourced service which would be in the region of £140,000 more expensive to the council which would place greater pressure on council budgets.
- 2.6. It is recommended that the Council secure a new contracted service with at least the same service level as is currently in operation. This would maintain the same opening hours, days, access, and material accepted. Utilising the procurement process, it is recommended that the Council seek to enhance customer satisfaction while ensuring affordability, with the overall objective to provide reliable and efficient services.
- 2.7. The specification for the new arrangements will also need to reflect:
  - The Council's statutory duties;
  - The Council's financial position;
  - The Council's Waste Strategies;
  - Information gathered as part of a market engagement exercise;
  - Information gathered as part of research into best practice.

- 2.8. The final provision will need to reflect the Council's Medium Term Financial Strategy and be affordable within projected budgets. Depending on actual costs received through the procurement process, the final specification may need to be amended to be contained within available budgets.
- 2.9. The Options Appraisal has reviewed each of the sites against good practice guidelines (Household Waste Recycling Centre Guide, WRAP, 2018) and while all sites would benefit from some improvement works, the Options Appraisal has highlighted some significant limitation on our sites at Corby and Wellingborough. The limitations are principally based on being constrained by their footprint and recommends the Council seeks expansion of these sites to meet future demands.
- 2.10. The Options Appraisal has outlined potential improvements and necessary investment actions for the HWRC operation in the medium and long term to keep pace with the growth of housing and the population of North Northamptonshire. This will enable the Council to consider the capital investment required for future-proofing the HWRC services.
- 2.11. Officers will develop an HWRC Strategy to be brought to a future Scrutiny and Executive meeting to ensure a roadmap for future HWRC provision to meet population growth.
- 2.12. The Executive have previously given approval for the procurement of a contract for residual waste disposal across waste collection and HWRC's. Reuse, Recyclate and organic waste disposal from the HWRC's will be included within the HWRC contract.
- 2.13. This report marks the completion of the HWRC Options Appraisal as required under the Waste 3 Year Plan 2022-23.

### **3. Recommendations**

---

- 3.1. It is recommended that the Executive:
  - i) Approve commencement of procurement of the Council's future Household Waste Recycling Centres (HWRC) contract.
  - ii) Approve that the operation of HWRC facilities in North Northamptonshire will be delivered under an outsourced operating model for a duration up to 15 years.
  - iii) Approve the extension of the current lease for the land for Corby HWRC by 3 years to enable a review to be undertaken on alternative provision for the area.
  - iv) Approve officers undertaking a review of alternative provision at Corby to consider the sourcing of a new lease for, or purchase of new or existing land, or utilisation of existing council owned land, dependent on which

provides the greatest value to both the Council and delivery of the service, on which to provide a HWRC facility in the vicinity of Corby.

- v) Delegate authority to the Executive Member for Highways, Travel and Assets, in consultation with Executive Director for Place & Economy, Executive Director for Finance and Performance and the Executive Member for Finance, the authority to take any further decisions and/or actions required in connection with the North Northamptonshire procurement process and award of the HWRC contracts, and property related transactions without the need to return to the Executive.

### 3.2. Reasons for Recommendations:

- The proposed option most closely aligns with local government reform and transformation outcomes for Waste Services in North Northamptonshire.
- The recommended course of action will allow the Council to secure the most cost-effective, solution for North Northamptonshire residents.
- This approach enables the Council to make informed decisions regarding its medium- and long-term financial planning for its Waste Management services.
- This approach ensures the Council has legally procured and has a compliant contract in place for the provision of services that provide a direct benefit to residents in disposing of their waste.

### 3.3. Alternative Options Considered:

- The alternative to procuring an HWRC contract would be for the Council to enter the HWRC sector by running its own facilities however it is considered that the lengthy lead in times and additional cost make this prohibitive.
- The Council could seek to jointly procure a new shared contract with West Northamptonshire Council to reflect existing arrangements however this could constrain the Council's ability to make decisions which best fits the future needs of North Northamptonshire

## **4. Report Background**

---

- 4.1. North Northamptonshire Council has a statutory duty under the Refuse Disposal (Amenity) Act 1978 "to provide places where refuse, other than refuse failing to be disposed of in the course of a business, may be deposited at all reasonable times free of charge by persons resident in the area...and to dispose of the waste so deposited".
- 4.2. Whilst there is no statutory minimum number of HWRC's that an authority is to provide, recommended guidance (Household Waste Recycling Centre Guide, 2018, WRAP) state a "maximum catchment radii of three miles in urban areas

and seven miles in rural areas covering the great majority of residents". In addition, "Maximum driving times for the great majority of residents of 20 minutes in urban areas and 30 minutes in rural areas; although preferably less than this by the order of 10 minutes in each case."

- 4.3. The current Household Waste Recycling Centre (HWRC) management contract commenced on 1<sup>st</sup> April 2010 and is a 15-year contract, ending on 31<sup>st</sup> March 2025. The current contract was procured by the former County Council for the whole of Northamptonshire and includes a network of nine HWRCs, four of which are in North Northamptonshire. The Council Hosts the HWRC Contract and runs the contract management on behalf of West Northamptonshire Council (WNC), via an Inter Authority Agreement (IAA) until the contract and IAA ends in 2025.
- 4.4. The current contract is managed by a relatively small team in the Council, with a dedicated Waste Management Officer being supported by a Waste Contracts Officer, a role that is currently vacant in the Council so under the IAA support is supplied by WNC. In 2025, the Council will need to make arrangements to cover that work within its own client team.
- 4.5. There are four North Northamptonshire HWRCs located in Corby, Kettering, Rushden and Wellingborough.
- 4.6. Currently, three of the four HWRCs are Council assets, the Council owns the land, with the fourth site (Corby) leased from Suez. The assets and the infrastructure on all four sites are owned by the Council or the current contractor, and further work will be carried out as part of the demobilisation of the current contract. The Options Appraisal has clearly identified there is a need to maintain a facility in the vicinity of Corby, as such there is a need for the Council to either secure a new lease for the current site or to source another site within the vicinity.
- 4.7. Rationalisation of the existing provision is not recommended in the immediate term. This is based on anticipated future demands as a product of a growing population within North Northamptonshire. High level modelling indicates that the existing network capacity is acceptable based on current demand but may not cope with a reduction in HWRCs.
- 4.8. During 2022/23 saw 458,566 visitors, to our network of HWRCs. Rushden is the busiest site attracting over 33% of visitors, the other 3 sites get between 21-23%.
- 4.9. The four HWRCs operate 5 days a week from 10am-6pm, Rushden and Kettering are split level sites and operate Trade Services, via onsite weighbridges, these sites are closed on a Monday and Tuesday. Corby and Wellingborough are ramp access sites closed on a Wednesday and Thursday.
- 4.10. All sites offer a reuse facility with local agents taking items for onward sale in local shops or via online Auction Houses. Ace Reuse operate the service for Kettering, Rushden and Wellingborough, while Corby is served by RecycleSmart.

4.11. The Council Commissioned an Options Appraisal to explore whether the current service has capacity to meet the needs of a growing population in North Northamptonshire, and if the current infrastructure is fit for purpose up until 2040. The appraisal also explored if there were opportunities for financial savings for the Council, and what options exist to improve and future-proof the HWRC.

4.12. The Options Appraisal reviewed and assessed:

- Capacity and the optimum location and number of HWRCs to meet future service requirements in accordance with industry standards, best practice, affordability and the Council's local requirements.
- Current Services and Policies, opening days and hours to maximise efficiency, customer satisfaction and the current e-permit scheme and recommended other schemes and their benefits.
- Potential Service and Policy changes the Council may consider such as an electronic booking system or other similar permit options to manage access, cross border access.
- In-house or outsourced delivery models; and
- Options for the locations of any new/replacement facilities.

4.13. The Options Appraisal shows:

4.13.1. The existing network capacity is acceptable based on current demand, with the HWRCs located within a good travel distance being less than 30 minutes for 98% of North Northants Residents. However, the facilities themselves require immediate attention to enable them to utilise their footprint and allow them to maximise their waste collection and maintain customer satisfaction and to meet future demands.

4.13.2. Benchmarking activity indicates that the current provision and operating policies appears comparable to councils with similar geographic and demographic characteristics, however on a total number of households per HWRC basis North Northamptonshire is on the high side and with growth in households could cause the capacity at existing sites to be unsustainable.

4.13.3. Modelling indicates that the existing network capacity is acceptable based on current demand but would not cope with a reduction from four to three HWRCs in their current design. None of the remaining facilities could feasibly absorb the forecast displaced material volumes should a site close.

4.13.4. Modelling suggests a potential increase in tonnage demand on the HWRC service of c.26% /c.7,000 tonnes by 2040 which will put pressure on the existing HWRC provision and layout configurations.

4.13.5. Benchmarking activity indicates that the current provision and operating policies are reasonable in comparison to councils with similar



geographic and demographic characteristics, however on a total number of households per HWRC basis North Northamptonshire is close to ideal with 39,114 households per HWRC compared to typical best practice of 1 for every 39,000 households but planned household growth may cause the existing sites to become unsustainable in the future should housing growth rates continue.

- 4.13.6. The review of current infrastructure shows that it will not be fit for purpose by 2040. The Council therefore needs to undertake improvements at all sites with significant investment required for Corby and Wellingborough, both constrained to challenging site footprints. This makes access for site users and adaptation to future service demands more challenging.
- 4.13.7. Opportunities for financial savings for the Council are limited as its current level of service and network are seen as the being required at the current level, and in need of enhancement in the future, this provides little scope for saving. Analysis of forecast cost differences between inhouse and outsourced options indicated that in both instances the cost of new service provision is anticipated to increase.
- 4.13.8. The review of In-house or Outsourced delivery models, looked at the service delivery, revenue generation and retention, staffing, service delivery costs, customer satisfaction, flexibility on service changes, service management, risk management (financial and other), governance, upfront costs and performance.
- 4.13.9. This leads to a recommendation of continuing an Outsourced service, this is due to:
- The Council having a long history of delivering the HWRC provision through a contract with an external service provider, currently Urbaser.
  - In-house service, whereby the service uses wholly in-house resources, i.e., staff employed directly by the respective Council using vehicles and/or equipment which are paid for by the Council is currently used by a relatively small proportion of local authorities in England. The in-house delivery model is far more prevalent in Wales and Scotland.
  - Provision of an insourced service is anticipated to cost c.5-7% more per annum.
- 4.14. The Options Appraisal has clearly identified there is a clear need to maintain a facility in the vicinity of Corby, as such there is a need for the Council to either secure a new lease for the current site or to source another site within the vicinity. Without a Corby site some residents of North Northants would be required to travel over 30 minutes to access a HWRC, and the remaining 3 sites would have insufficient capacity to service the additional visitors.

- 4.15. The Options Appraisal provides a lot of background, narrative and advantages and disadvantages of possible changes to the Council's HWRC services. This forms a solid base to explore any future changes within a HWRC Strategy.
- 4.16. A HWRC Strategy should review and assess the potential changes to the service and infrastructure in line with the Council's consultation policy and develop a medium to long term plan for implementation of required changes and improvements. This should include but not be limited to items reviewed in the Options Appraisal such as:
  - 4.16.1. Opening days and hours to maximise efficiency, increase user/customer satisfaction.
  - 4.16.2. Electronic booking system or other similar Residents only permit options to manage access.
  - 4.16.3. The current e-permit scheme and recommend other schemes and their benefits;
  - 4.16.4. Legislation changes that provide new opportunities to increase the opportunities to recycle or reuse at our HWRCs
  - 4.16.5. Options for Infrastructure Investment at existing sites and the locations of any new/replacement facilities
  - 4.16.6. Further consideration of inhouse-outsourced services. If an inhouse operation is desired it can set out the full business case and set a time-frame that the Council can achieve to deliver.

## **5. Issues and Choices**

---

- 5.1. The In-house or Outsource operating model has been explored via the Options appraisal, which included benchmarking and using available industry data to identify higher costs of an In-house service. Procuring an outsourced service will allow a competitive price will be achieved via formal procurement competition.
- 5.2. Higher costs for an insourced model arise as a result of the need to have additional specialist staff in place who are able to ensure that HWRC's sites and operations remain legally compliant under environmental, health and safety and waste regulations, Similarly, external providers will have access to specialist and at times bespoke software systems. These are resources which external providers are able to use to spread the cost across multiple waste contracts and not just HWRC's. An outsourced contract would be responsible for disposal of refuse, recyclate and organic materials for which they would take a dynamic approach to resale of the various commodities and reduce their risks through having direct control over contaminated waste. The Council would have neither the skills nor the capacity to undertake such a dynamic approach to waste disposal and therefore would need to seek to separately outsource non-

residual waste disposal which would be at an increased cost due to the inability to offer dynamic marketing nor assured quality control.

- 5.3. It is considered that the timescales to recruit specialist staff, develop an inhouse delivery model, identify and procure appropriate software systems and ensure all relevant certification and permitting is in place would take at least 2 years were the council to have a full client team currently in place. There is not yet a full team in place to provide the capacity to undertake the work and so is likely to take longer whilst either in-house or consultancy capacity is recruited. There is therefore insufficient time before the end of the current contract to have the structure in place to insource the service
- 5.4. By contracting out, the Council will share risks associated with running services and have potential for seeking greater financial returns from recyclate sales as contractors will have access to better/larger established brokerage services.
- 5.5. The Council need to consider the renewal of the lease at the existing Corby HWRC site or find alternative land which does not adversely affect accessibility. Renewal at the existing site needs to be explored alongside increasing the footprint of the site to allow reconfiguration on the site to accommodate the current and future volume of visitors and traffic. While finding a new site may achieve the increased footprint, it may have permit and planning limitations which makes it unachievable by 1<sup>st</sup> April 2025. Both options have a cost implication, and this is being explored with the Council property team.
- 5.6. Section 51 of The Environmental Protection Act 1990 places a duty on councils to provide Household Waste Recycling facilities. There is no mention of the number of facilities needed, just the requirement for them to be 'reasonably accessible to persons resident in the area.' Good practice indicates residents should be within 30 minutes' drive of a HWRC. Removal of a site at Corby would mean some residents of North Northants would be beyond that 30-minute drive time.

## **6. Next Steps**

---

- 6.1. The Executive are asked to approve an outsourced HWRC service for a duration up to 15 years, with reasonable break clause/extension review points, to check the Council is still achieving best value.
- 6.2. Following this the Project team will go out to tender via The Council's Procurement team, utilising the appropriate procurement model such as Competitive Procedure with Negotiation (CPN) to ensure we secure the optimum operating model and best value for the North Northamptonshire HWRC network.
- 6.3. The Project team will work with the Council Property to secure a site for Corby HWRC. This will explore a new lease on the current site, seeking additional land to future proof growth on the site (if permission/permitting allow), or sourcing another permitted location within close vicinity of Corby for an alternative site.

- 6.4. The Award of the HWRC Contract will be under delegated powers if agreed.
- 6.5. Following the award of the contract the project team will oversee mobilisation of the new contract leading to the contract commencement on 1<sup>st</sup> April 2025, as well as overseeing the demobilisation of the old contract.
- 6.6. The Waste Management team will seek to ensure medium- and long-term plans for services and infrastructure improvements at our HWRC network are secured within a HWRC Strategy. The HWRC Strategy will aid in seeking investment through our MTFP budget setting processes for capital and or revenue investment, to ensure the future HWRC service and sites are fit for purpose.
- 6.7. It is noted that some elected members gained extensive knowledge and experience in their predecessor authorities through the existence of the Northamptonshire Waste Partnership (NWP). It is intended that those councillors who were active members of the NWP should be consulted with at appropriate stages in the delivery of the recommendations (up to award of contract). Whilst they will have no decision-making powers, this will ensure that the Council utilises the corporate knowledge and experience that these members have.

## **7. Implications (including financial implications)**

---

### **7.1. Resources and Financial**

- 7.1.1. The service currently spends £2.693m on the provision of an HWRC service and future service delivery will need to be constrained within the budgets identified within the Medium-Term Financial Plan for the start of the contract period.
- 7.1.2. The current service Budget covers:
  - Corby Site Rent (currently c.£56k)
  - The HWRC Contract, wood waste bonus and handling and haulage.
  - Disposal costs of residual and wood waste from HWRC
  - Recyclate income (guaranteed and variable).
- 7.1.3. Insourced services are anticipated to cost in the region of 5-7% more per annum than outsourced services and so would place an additional unfunded pressure on budgets
- 7.1.4. The Medium-Term Financial Plan has accounted for RPI inflation of costs and an element of population growth to seek budget increases, these would see the base budget in 2024/25 being £2.848m
- 7.1.5. The above growth projection includes an anticipated uplift of leasing costs of the site at Corby; however, the exact figures will be subject to negotiation with the landowner and therefore has the potential to come out higher than the budget set aside.

- 7.1.6. The Council also needs to consider the client team within Waste Management which will lose the shared resource of Waste Contracts Officer currently provided by WNC and should consider this within any service restructure.
- 7.1.7. The Waste Management team are working with the Council's Property colleagues to assess availability of suitable Council assets as well as consider land values, rental options etc to ascertain the likely costs of continued provision of a Corby site. Either at the existing leased location, or an alternative location.
- 7.1.8. Where financial implications for either the procurement of the service or the lease arrangements for the Corby site are identified beyond the current and forecast budget, they will be picked up and reviewed with the Highways and Waste Finance Business Partners who are on the Procurement Steering Group, and escalated for review, assessment and decisions to proceed via the Executive Members and Officers as per the requested delegation within this paper.
- 7.1.9. The service will work with the Council's finance and procurement teams to identify the most appropriate inflationary index for the new contract to ensure that the Council derives value for money throughout the life of the contract.

## **7.2. Legal and Governance**

- 7.2.1. The Environmental Protection Act 1990, at section 51, places a duty on councils to provide to provide Household Waste Recycling facilities.
- 7.2.2. Any procurement exercise for goods, works or services must be conducted in accordance with the Council's governance and legal obligations, specifically in compliance with the Council's Contract Procedure Rules and the Public Contract Regulations 2015 (PCR2015). PCR 2015 requires contracts for supplies and services more than £189,330 to be tendered in accordance with the regulations by way of a tender process.
- 7.2.3. Where legal implications are identified they will be picked up and reviewed with the Council's Legal Business Partner and the Council's appointed Legal Advisors who are on the Procurement Steering Group, and escalated for review, assessment and decisions to proceed via the Executive Members and Officers as per the requested delegation within this paper

## **7.3. Relevant Policies and Plans**

- 7.3.1. The operation of HWRCs assist the Council in meeting the priorities in the Corporate Plan around:
- Modern public services

- Ensuring we are providing efficient, effective and affordable services that benefit the communities across North Northamptonshire.
- Green, sustainable environment:
  - Ensuring we are encouraging recycling and reuse by providing appropriate access to facilities for our residents, helping to keep our environment free from litter.

7.3.2. The Waste Management 3-Year Plan (2022-25) sets out activities needed within the waste services to allow development of harmonised services for residents of North Northamptonshire.

7.3.3. Activity undertaken in this service area is supported by the following corporate policies and plans:

- Highways & Waste Service Plan (2023-24)
- North Northamptonshire Waste & Recycling Policy
- Street Cleansing Policies
- Litter and Fly tipping strategy
- Enforcement Policy for Waste Crime
- North Northamptonshire Council Carbon Management Plan

#### 7.4. Risk

7.4.1. Loss of recycling processing and disposal facilities has been identified as a key risk for the waste management service and has been included in the service risk register. All the activities contained within the plan are controls to mitigate this risk.

7.4.2. There is a risk that any new contract may be more expensive than the existing arrangements. This can only be determined by carrying out a procurement exercise. Even if it is more expensive than the current arrangements, it will be the most cost-effective option that the Council can achieve through the legally compliant procurement route. There will be an opportunity for some negotiation after the initial tender returns to seek to reduce prices within available budget, if possible.

7.4.3. Not undertaking the procurement of new HWRC services for 2025 will see the Council have to close these facilities until a new contract is in place which removes opportunity for community recycling, reuse which could result in:

- Increased Fly tipping – especially of bulky items and non-recyclables
- Increased kerbside collection costs as waste previously taken to HWRC is presented in kerbside recycling resulting in longer round times or incomplete rounds.
- Waste that could be recycled ending up in more expensive kerbside residual waste, with the risk of being landfilled and not being recovered for recycling.

7.4.4. The principal controls within this procurement will be ongoing overview by the Steering Group set up within the service for the Procurement of the Residual Waste Contract which will extend its remit to cover the HWRC procurement. Membership of which consists of:

- Executive Director Place & Economy / Assistant Director Highways and Waste
- Waste Management Officers
- Finance - Highways and Waste Finance Business Partners
- Procurement - Business Services Category Partners
- The Council's Legal Service - Contracts/Project Solicitor

7.4.5. The Steering Group will maintain and review a project Risk Register and seek early identification and mitigating actions for issues/risk.

## 7.5. Consultation

7.5.1. No consultation has been undertaken at this stage as the activities contained within the Report are mandatory due to the requirements under Public Contracts Regulations or as part of the Statutory duties laid out under the Environmental Protection Act 1990

7.5.2. Should there be a need to make changes to HWRC services as a result of submitted tenders and negotiation, we will ensure we undertake consultation in line with Council policy and guidelines.

## 7.6. Consideration by Executive Advisory Panel

7.6.1. Sustainable Communities and Prosperous Communities Executive Advisory Panel members were invited to Workshops that formulated the HWRC Options Appraisal – 19<sup>th</sup> July 2023, and 4<sup>th</sup> September 2023

7.6.2. The HWRC Operations 2025 Report and final Options Appraisal were considered by Sustainable Communities Executive Advisory Panel on 11<sup>th</sup> October 2023.

7.6.3. In respect of the report and its recommendations EAP expressed:

7.6.3.1. Concerns over the duration of contract proposed – the recommendation of up to 15 years this is the result of initial soft market testing. Which identified 8-10 years initial terms plus extensions up to 15 years would be favourable, as the need for any contractor to have sufficient contract length to depreciate assets they need to use on the contract over the life of the contract, a shorter contract could result in the depreciation risk being added to the contract price.

7.6.3.2. Additional concerns at the suitability of the Corby HWRC site due to neighbouring development and the long-term option for Corby. – The

options for Corby which is being considered with the Council's Property colleague in terms of leasing/land within the Council's Ownership our plans to find a suitable solution. A long-term solution for HWRC services in the Corby area, as with all other HWRCs will be set out in the proposed HWRC Strategy to be developed.

- 7.6.3.3. Disappointment at the outsourced recommendation – this is the result of the Options Appraisal, benchmarking and review of our current services, and knowledge/skills base of officers. Furthermore, the indicative 18–24-month timeline to bring in house (if you already have a big enough client team, which the Council does not, takes us beyond our current contract end date). If the Council has a desire for in-house services this should be properly explored, developed and implemented as part of the HWRC long term strategy.

## 7.7. Consideration by Scrutiny

- 7.7.1. The HWRC Operations 2025 Report and Final Options Appraisal were considered by Place and Environment Scrutiny on 31<sup>st</sup> October 2023

- 7.7.2. In respect of the report and its recommendations:

- 7.7.2.1. The Scrutiny Committee accepted that the report and Options Appraisal set out a clear case and supported the recommendation to procure a third-party provider for the service.
- 7.7.2.2. The Scrutiny Committee welcomed the development of an HWRC strategy to identify opportunities to make the HWRC's fit for the future needs of the area and requested that the strategy undergoes a broad consultation process and comes to the Committee for examination. The existing facility at Corby was identified as an area of particular concern due to its current constrained nature.
- 7.7.2.3. The Committee wanted reassurance that the powers of delegation are limited to costs being contained within the Medium-Term Financial Plan funding provision and current service levels being retained. They expressed their desire for any changes required outside of these constraints to be considered by the Scrutiny Committee.

## 7.8. Equality Implications

- 7.8.1. An Equalities Screening Assessment (ESA) has been completed the indicating no need at this stage for an Equalities Impact Assessment (EqIA). The ESA is attached at **Appendix B**.
- 7.8.2. At this time there is no planned change to the HWRC service other than securing a new operator. However, there are several operational issues that



could need to be reviewed within the procurement process, which means there is a need to keep equalities impacts under review. This is to ensure there are no negative impacts on any of the protected groups owing to the outcomes of this report.

7.8.3. The Council is committed to treating people fairly, as such the Procurement Steering Group will maintain a live Equalities Plan to be monitored by the throughout decision making processes linked to the HWRC procurement. If during the procurement there is identified a need to make changes to services which could impact any protected group the Waste Management team, on behalf of the Steering Group, will undertake further ESA or EQIA to identify and mitigate any negative impact of any changes.

7.8.4. Any additional ESA- EQIA will be submitted to the Equalities Team and published in line with Council policy/guidelines.

## **7.9. Climate and Environment Impact**

7.9.1. The Council, having declared a climate change emergency in June 2021, is committed to reducing its climate impact both within its own Council buildings and in working with businesses and the wider community to achieve the Council's target to be Carbon Neutral by 2030, and the target of National Net Zero energy emissions 2050.

7.9.2. By ensuring the Council has appropriate contracts in place to provide HWRCs it is able to meet its obligations for provision of facilities for disposal of the wide range of waste types accepted at our HWRCs, keeping those materials from landfill. Therefore, the Council can continue to promote and encourage the separate collection and appropriate treatment of recyclable, reusable and compostable material. This approach seeks to reduce the environmental impact of waste disposal.

7.9.3. By entering into contract arrangements, the Council can monitor the impacts of managing the material to ensure that it is ethically and environmentally managed in accordance with Waste Management legislation and aligns with the Council's strategy in terms of Climate Change.

7.9.4. Any new contractual arrangements will include a commitment from new contractors to meet help the Council meet its targets as well as a commitment to meeting national targets within the Net Zero Carbon agenda.

## **7.10. Community Impact**

7.10.1. The HWRC service is highly valued by residents and provides a valuable service for all North Northants residents who wish to increase the total amount of material recycled from their households. The HWRC support kerbside recycling by providing additional recycling opportunities.

7.10.2. By putting in place a contract that seeks extraction of all recyclables for the residual waste streams the Council can encourage and promote recycling, which provides all communities with the associated environmental and societal benefits.

#### **7.11. Crime and Disorder Impact**

7.11.1. By maintaining operation of HWRCs we will be ensuring we have appropriate disposal routes for waste. As such supporting the tackling illegal waste disposal and associated anti-social activities therefore mitigating crime and disorder offences associated with illegal waste disposal.

### **8. Background Papers**

---

8.1. There are no background papers to this report.



# North Northamptonshire Council HWRC Options Appraisal

## HWRC Option Appraisal

### North Northamptonshire Council

Sheerness House, 41 Meadow Road, Kettering, Northants NN16 8TL

Prepared by:

### SLR Consulting Limited

Treenwood House, Rowden Lane, Bradford on Avon,  
BA15 2AU

SLR Project No.: 402.064870.00001

Client Reference No: 135547

22 September 2023

Revision: FINAL

## Revision Record

| Revision | Date              | Prepared By  | Checked By       | Authorised By    |
|----------|-------------------|--------------|------------------|------------------|
| 1        | 12 September 2023 | Chloe Mcleod | Ian Manley       | Ian Manley       |
| 2        | 13 September 2023 | Ian Manley   | Grant Pearson    | Ian Manley       |
| 3        | 13 September 2023 | Ian Manley   | NNC              | Ian Manley       |
| 4        | 20 September 2023 | Ian Manley   | NNC              | Ian Manley       |
| 5        | 21 September 2023 | Ian Manley   | Ian Manley       | Ian Manley       |
| Final    | 22 September 2023 | Ian Manley   | Richard Garfield | Richard Garfield |

## Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with North Northamptonshire Council (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.



## Executive Summary

SLR Consulting Ltd has been commissioned by North Northamptonshire Council (NNC) to conduct a review of its Household Waste Recycling Centres (HWRCs) ahead of the expiry of the current contract provisions. The service review and options appraisal has been developed using information gathered from site visits to each of the facilities during July 2023 and is supported by information supplied by NNC and broader desk-based research. A summary of the project deliverables are detailed below:

To explore whether:

- The current service has capacity to meet the needs of a growing population in North Northamptonshire;
- The current infrastructure will be fit for purpose up until 2040;
- There are opportunities and any implications for financial savings for NNC; and
- Options exist to improve and future-proof the HWRC.

To review and assess:

- In-house or outsourced delivery models;
- The optimum location and number of HWRCs to meet future service requirements in accordance with industry standards, best practice, affordability, and the Council's local requirements;
- Current opening days and hours to maximise efficiency, increase user/customer satisfaction;
- Electronic booking system or other similar options to manage access at peak times and discuss associated benefits (advantages) or detriment (disadvantages);
- The current e-permit scheme and recommend other schemes and their benefits; and
- Options for the locations of any new/replacement facilities

To Provide Councillor engagement session(s)

- These were delivered in the form of two Councillor workshops held on 19 July 2023 and 4 September 2023

### Service background

The existing HWRC service is a product of a long-term legacy contract developed and procured by Northamptonshire County Council. During this term the sector and demands on HWRC services have changed considerably. The advent of new and emerging legislation and broad financial pressures experienced by Councils have resulted in the need for HWRC facilities to adapt and change significantly within the last decade.

For the HWRCs located within North Northamptonshire this has involved a reduction in the original contracted requirements, including the closure of the Wollaston HWRC, reduced opening hours and removal of meet and greet services across all remaining sites to make cost savings.

The current network of HWRCs is well distributed to serve the local population and in many areas deliver good quality and value for money services. Two of the four HWRCs (Corby and



Wellingborough) need immediate attention to ensure they are retained and enhanced to manage the demands of the coming new services period.

### **Approach**

This report contains a detailed review of each of the four HWRCs and assesses the current provision, performance, and policy approaches to produce current service assessments. The assessment information is then used to explore options for the future service delivery beyond the expiry of the current contract. A summary of each of the key report areas are detailed in the table below.



| Report section                        | Summary findings  |
|---------------------------------------|---|
| <p><b>HWRC network assessment</b></p> | <ul style="list-style-type: none"> <li>• The current annual arisings from the HWRC service comprise c.27,000 tonnes of a total of c.170,000 tonnes of materials managed by NNC (16%). Typically, the HWRCs on an annual basis achieve a reuse, recycling, and composting performance of &gt;65%.</li> <li>• Analysis of drive times suggests that the existing locations of HWRCs are good and can be accessed by the vast majority of residents within 20 minutes (c.95%).</li> <li>• 98% of the NNC population are located within 30 minutes of a HWRC within the NNC area.</li> <li>• Modelling indicates that the existing network capacity is acceptable based on current demand but would not cope with a reduction from four to three HWRCs in their current design. None of the remaining facilities could feasibly absorb the forecast displaced material volumes should a site close.</li> <li>• Forecast housing growth data provided by NNC indicates a significant increase in housing numbers and consequential service pressures over the next envisaged service period.</li> <li>• Waste flow modelling detailed in Section 7.3 suggests a potential increase in tonnage demand on the HWRC service of c.26% /c.7,000 tonnes by 2040, which will put pressure on the existing HWRC provision and layout configurations. Details of potential adaptations to existing HWRCs to respond to this demand are detailed in section 5.0</li> </ul> |
| <p><b>Benchmarking</b></p>            | <ul style="list-style-type: none"> <li>• For the purpose of comparison, SLR worked with the Council to identify a selection of local authorities which are considered to be reflective of the circumstances applicable to North Northamptonshire, and therefore provide a reasonable basis for benchmarking of the HWRC service which the Council currently provides. The level of feedback provided by other Councils was poor. Therefore, supplementary information was used to produce comparisons.</li> <li>• Based on the total area served and the total number of households alone, the current provision/ number of HWRCs provided by NNC appears reasonable in comparison to similar/ benchmarked Councils. Focusing on total households per HWRC, NNC does have one of the higher ratios (One HWRC per 39,000 households) which coupled with anticipated housing growth could suggest the need additional HWRCs in future. However, the need for new infrastructure will be a product of the Councils ability to deliver short to medium term improvements at its existing HWRCs.</li> </ul>  |



| Report section                                   | Summary findings   |
|--|--|
| <b>Best practice review</b>                      | <ul style="list-style-type: none"> <li>• The HWRC service, based on a range of qualitative and quantitative assessment criteria is deemed to provide good performance but could benefit from some improvement in some areas to meet best practice. Namely the provision of split level facilities and the operation of meet and greet services to improve performance.</li> <li>• Corby and Wellingborough HWRCs are not split level and are constrained to challenging site footprints. This makes access for site users and adaptation to future service demands more challenging.</li> <li>• There are currently no controls over cross border HWRC usage from neighbouring Councils. This represents a point of exposure to NNC in respect of cost control with several surrounding Councils implementing resident only schemes. Bedford, Milton Keynes, and Rutland Councils all require proof of residency to access their HWRC facilities.</li> </ul> |
| <b>Infrastructure assessment</b>                 | <ul style="list-style-type: none"> <li>• Each of the existing HWRCs present opportunities for adaptation and expansion to cope with future service demands.</li> <li>• Changes at the Corby and Wellingborough HWRCs should be prioritised to ensure the service is capable of managing future demand. These include the expansion of the existing site areas to develop improved access and future proofing capabilities.</li> <li>• Indicative costs to deliver the basic level of improvements required to manage future demand range between £1.5m-£3m in the medium term (2-5 years).</li> </ul>  |
| <b>Future service delivery options appraisal</b> | <ul style="list-style-type: none"> <li>• Analysis of forecast cost differences between contracted out and insourced options indicated that in both instances the cost of new service provision is anticipated to increase.</li> <li>• Contracted out services are projected to cost c.10% more than the service baseline and a fully insourced service c.15-17% more per annum.</li> <li>• A high-level assessment of the likely governance, transition arrangements, projects and activities required to insource HWRC services suggests a period of between 18-24 months as a minimum would be required to allow NNC to bring the service in house.</li> </ul>   |

**Recommendations/ next steps**

Based on the assessment and options appraisal conducted, the following recommendations have been provided:

**Short term (0-1 years)**

1. Based on the time available until the current contract expiry and the limited resources available within the existing waste service structure dedicated to the HWRCs, bringing the service fully inhouse appears to be a significant challenge for the Council. The formation of the two unitary Councils and disaggregation of the waste teams has produced a knowledge and capability gap within this particular area of service delivery.





This represents a significant barrier to the development of an adequate programme with supporting projects to deliver the change from the existing contracted service delivery model to a fully insourced function within the remaining time period.

Based on the information gathered as part of this commission and the high-level modelling and assessment conducted it appears prudent that based on the timescale, internal resources and capability, and indicative cost differences, that a contracted service delivery model should be the preferred approach to the next phase of service delivery.

Should the Council's objectives regarding delivery of inhouse services become more pronounced then the term of any future contract could be designed accordingly. This would allow a suitable transition period for the Council to adequately prepare and support inhouse delivery.

2. A rationalisation of the existing provision is not recommended in the immediate term. This is based on the anticipated future demands as a product of a growing population within the Council area. Benchmarking also suggests the current HWRC provision in NNC, based on a total number of households per HWRC basis, appears comparable to similar geographic and demographically matched Councils.
3. Explore and secure an extension to the Corby HWRC lease. The term of the lease is linked to the end of the existing contract. It is understood that Council officers have commenced engagement with the landlord. Confirmation of the use of the facility (or not) should ideally be in place at the point of formal tender release to provide certainty over bidding

#### **Medium term (2-5 years)**

1. It is recommended that the Council engages and establishes a formal business case approach to delivering infrastructure improvement over the short and medium term. Indicative costing suggest improvements with a range of £1.5-£3m would be required to deliver the immediate improvements required at Corby and Wellingborough.

Securing funding for these improvements could involve entry of schemes into the internal Council capital programme or exploring the delivery of infrastructure via a contracted service provider.

A formalised infrastructure improvement commitment and associated delivery programme is required to make improvement in existing HWRCs. This will ensure the network of HWRCs is fit for purpose for the next service delivery period and beyond.

2. To ensure the HWRC service remains capable of providing good value and quality services to NNC residents, the evolution and development of future service policy is recommended. This should consider the current absence of cross border restrictions and the need to manage traffic volumes at constrained HWRCs potentially with the use of booking systems or other restrictions.
3. The existing commercial waste offering could be better utilised, and a series of market research and promotions, targeted at potential local commercial waste customers may help to generate additional income for NNC.

#### **Long term (5+ years)**

1. As a new Unitary Council, the incorporation of waste collection alongside waste disposal functions presents an opportunity to the Council when considering infrastructure development. SLR's experience suggests that there are clear synergies that can be achieved when considering the requirements of the waste collection, transfer and HWRC provision. Therefore, the development of a capital programme may



wish to consider a wider more holistic view of waste services infrastructure development.

### Next Steps

Early engagement with internal procurement and legal departments will be essential in developing a new contract opportunity. The use of technical advisers may also be required for certain aspects of the contract design and tender evaluation processes. The following considerations need to be established by the Council.

1. Confirm and commission all hand back arrangements with the incumbent contractor including:
  - a. Any condition surveys or handover plans required as part of existing contractual terms;
  - b. Complete and agree asset registers with the incumbent contractor to determine the extent and potential cost of new assets and equipment; and
  - c. Produce a viable cost estimate for the level of capital expenditure required to deliver a new service – number of containers and bespoke equipment.
2. Develop a procurement strategy which includes well planned market engagement, assessment of the condition of the HWRCs, the extent of asset ownership and engagement with key NNC stakeholders to define key service outcomes and priorities including:
  - a. **Preferred procurement route** considering the likely changes required to the existing cost and risk profiles;
  - b. **Contract design** – including term and key contractual clauses, including but not limited to; change in law, liabilities, and extension provisions
  - c. **Specification design** - to deliver the desired service outcomes;
  - d. **Payment and performance mechanisms** – designed to reflect the change in market conditions, the potential to deliver greater transparency and to incentivise the desired contractor behaviour;
  - e. **KPIs** - design of realistic and proportionate performance measures, which will be monitored for the contract duration;
  - f. **Bidder information** - collating and producing essential service information to assist bidders in delivering well informed pricing; and
  - g. **Asset decisions** - determining how service assets should be provided and how ownership and lease arrangements should be managed.
3. Establish and confirm the governance and approval pathway within internal democratic structures. This will ensure key approval dates can be aligned within the design of the procurement process.



## Table of Contents

|  |           |
|--|-----------|
| <b>Basis of Report .....</b>                         | <b>i</b>  |
| <b>Executive Summary .....</b>                       | <b>ii</b> |
| <b>Acronyms and Abbreviations .....</b>              | <b>1</b>  |
| <b>1.0 HWRC Network Assessment .....</b>             | <b>1</b>  |
| 1.1 Current Service Overview.....                    | 1         |
| 1.2 Arisings .....                                   | 2         |
| 1.3 Housing Pressures .....                          | 3         |
| 1.4 Relevant Legislation Strategy and Policy.....    | 4         |
| 1.5 Current Contract Provisions .....                | 9         |
| 1.6 Individual HWRC Overview .....                   | 9         |
| 1.7 Usage.....                                       | 10        |
| 1.8 HWRC Descriptions .....                          | 11        |
| 1.8.1 Corby HWRC .....                               | 11        |
| 1.8.2 Kettering HWRC.....                            | 12        |
| 1.8.3 Rushden HWRC.....                              | 13        |
| 1.8.4 Wellingborough HWRC .....                      | 14        |
| 1.9 HWRC Drive Time Analysis.....                    | 15        |
| <b>2.0 Current HWRC Policy.....</b>                  | <b>18</b> |
| 2.1.1 Vehicle Access.....                            | 18        |
| 2.1.2 Cross Border Policies .....                    | 18        |
| 2.1.3 Material Acceptance.....                       | 18        |
| 2.1.4 Trade Waste Enforcement.....                   | 20        |
| 2.2 Policy Review.....                               | 21        |
| 2.2.1 Opening Hours .....                            | 21        |
| 2.2.2 Permit Schemes .....                           | 24        |
| 2.2.3 Existing Charging Policies for DIY Waste ..... | 25        |
| <b>3.0 Benchmarking .....</b>                        | <b>27</b> |
| <b>4.0 Best Practice Service Review .....</b>        | <b>29</b> |
| 4.1 The HWRC Service .....                           | 29        |
| 4.2 Site Specific Assessment .....                   | 33        |
| 4.2.1 Corby .....                                    | 34        |
| 4.2.2 Kettering.....                                 | 35        |
| 4.2.3 Rushden.....                                   | 35        |
| 4.2.4 Wellingborough .....                           | 36        |
| <b>5.0 Infrastructure Review.....</b>                | <b>37</b> |



|            |  |           |
|------------|--|-----------|
| 5.1        | Corby .....  | 37        |
| 5.2        | Kettering.....   | 39        |
| 5.2.1      | Existing Container Bay Expansion.....                          | 39        |
| 5.2.2      | Repurposing the Education Facility .....                       | 39        |
| 5.2.3      | Redesigning the Lower Service Area.....                        | 40        |
| 5.3        | Rushden.....   | 40        |
| 5.4        | Wellingborough .....   | 41        |
| 5.5        | Longer Term Requirements.....                                  | 41        |
| 5.6        | Indicative New HWRC Costs .....                                | 43        |
| <b>6.0</b> | <b>Future Service Policy Considerations .....</b>              | <b>45</b> |
| 6.1        | Cross Border Policies .....                                    | 45        |
| 6.2        | Booking Systems.....   | 45        |
| 6.3        | Commercial Waste Opportunities .....                           | 47        |
| 6.4        | Black Bag Inspections and Splitting.....                       | 47        |
| 6.5        | Novel Materials .....  | 48        |
| <b>7.0</b> | <b>Future Service Delivery Assessment.....</b>                 | <b>50</b> |
| 7.1        | Future Service Delivery Options - Qualitative Assessment ..... | 50        |
| 7.1.1      | Service Delivery .....   | 53        |
| 7.1.2      | Revenue Generation and Retention .....                         | 54        |
| 7.1.3      | Staffing.....  | 55        |
| 7.1.4      | Service Delivery Costs .....                                   | 58        |
| 7.1.5      | Customer Satisfaction .....                                    | 58        |
| 7.1.6      | Flexibility to Introduce Service Changes.....                  | 59        |
| 7.1.7      | Service Management .....                                       | 60        |
| 7.1.8      | Risk Management (Financial) .....                              | 61        |
| 7.1.9      | Risk Management (other) .....                                  | 61        |
| 7.1.10     | Governance.....  | 62        |
| 7.1.11     | Upfront Costs .....  | 63        |
| 7.1.12     | Maximising Performance .....                                   | 63        |
| 7.2        | Future Service Delivery Options - Quantitative Assessment..... | 64        |
| 7.2.1      | Service Delivery Model Options.....                            | 64        |
| 7.2.2      | Modelling Approach.....  | 65        |
| 7.2.3      | Key Assumptions.....   | 65        |
| 7.3        | Modelling Outputs .....  | 67        |
| <b>8.0</b> | <b>Conclusions.....</b>  | <b>69</b> |
| 8.1        | Service Review .....   | 69        |
| 8.2        | Future Service Delivery Options Assessment.....                | 69        |



|       |   |    |
|-------|---|----|
| 8.2.1 | Timeframe, Resources and Capability         | 69 |
| 8.2.2 | Qualitative Assessment                      | 70 |
| 8.2.3 | Quantitative Assessment                     | 70 |
| 8.2.4 | Delivery Model Recommendation               | 70 |
| 8.3   | Infrastructure Development                  | 71 |
| 8.3.1 | Capital Works                               | 71 |
| 8.4   | Next Steps                                  | 71 |
| 8.4.1 | Procurement                                 | 71 |
| 8.4.2 | Secure an Extension to the Corby HWRC Lease | 72 |
| 8.4.3 | Capital Works                               | 73 |

## Tables in Text

|           |   |    |
|-----------|---|----|
| Table 1.1 | High level NNC HWRC Budget 2023/24                                | 2  |
| Table 1.2 | Forecast HWRC Tonnage Increases                                   | 4  |
| Table 1.3 | Legislative Overview with HWRC Service Impacts                    | 4  |
| Table 1.4 | HWRC Performance Overview   | 9  |
| Table 1.5 | ANPR Data Analysis by Site  | 11 |
| Table 1-7 | Drive Time Analysis from all HWRCs                                | 17 |
| Table 1-8 | Drive Time Analysis from each HWRC                                | 17 |
| Table 2.1 | North Northamptonshire HWRC Material Acceptance                   | 19 |
| Table 2.2 | North Northamptonshire HWRC Trade Waste Fee                       | 21 |
| Table 2.3 | NNC and Neighbouring Authorities - Total Availability Hours       | 22 |
| Table 2.4 | ANPR Data Analysis by Site  | 23 |
| Table 2.5 | ANPR Data Analysis by Site and Summer / Winter Opening Hours      | 23 |
| Table 3.1 | Benchmarking Review, Central Bedfordshire Questionnaire (2022/23) | 27 |
| Table 3.2 | Benchmarking Review, High Level                                   | 28 |
| Table 4.1 | Table Key   | 29 |
| Table 4.2 | HWRC Best Practice Summary  | 29 |
| Table 4.3 | Best Practice Assessment Guidance                                 | 34 |
| Table 4.4 | Individual Site Best Practice Assessment – Corby                  | 34 |
| Table 4.5 | Individual Site Best Practice Assessment - Kettering              | 35 |
| Table 4.6 | Individual Site Best Practice Assessment - Rushden                | 35 |
| Table 4.7 | Individual Site Best Practice Assessment - Wellingborough         | 36 |
| Table 5.1 | Potential Indicative Costs - Corby                                | 38 |
| Table 5.2 | Potential Indicative Costs - Kettering                            | 40 |
| Table 5.3 | Potential Indicative Costs - Rushden                              | 41 |



|   |    |
|---|----|
| Table 5.4 Potential Indicative Costs - Wellingborough.....            | 41 |
| Table 5.5 Budget Estimate - HWRC Construction Cost.....               | 44 |
| Table 6.1 Neighbouring Authority Cross Border Policies .....          | 45 |
| Table 6.2 HWRC Booking Systems- Advantages and Disadvantages.....     | 46 |
| Table 7.1 Summary of Service Delivery Qualitative Assessment .....    | 51 |
| Table 7.2 Service Delivery Option Assessment.....                     | 53 |
| Table 7.3 Revenue Generation and Retention .....                      | 54 |
| Table 7.4 Staffing.....   | 55 |
| Table 7.5 Service Delivery Costs .....                                | 58 |
| Table 7.6 Customer Satisfaction .....                                 | 58 |
| Table 7.7 Flexibility to Introduce Service Changes.....               | 59 |
| Table 7.8 Service Management .....                                    | 60 |
| Table 7.9 Risk Management .....                                       | 61 |
| Table 7.10 Risk Management (Other) .....                              | 61 |
| Table 7.11 Governance.....  | 62 |
| Table 7.12 Upfront Costs .....  | 63 |
| Table 7.13 Maximising Performance .....                               | 63 |
| Table 7.14 Historic Dwelling numbers .....                            | 66 |
| Table 7.15 Service Delivery Modelling Outputs.....                    | 67 |
| Table 8.1 Project household numbers (moderate, low and high).....     | 77 |
| Table 8.2 Staff Salary assumptions – unit cost per FTE .....          | 78 |
| Table 8.3 Number of FTE.....  | 78 |
| Table 8.4 HWRC Contract Cost (2024/25) .....                          | 79 |
| Table 8.5 Other Costs to the Council (2024/25) .....                  | 79 |
| Table 8.6 Material Income assumptions .....                           | 80 |
| Table 8.7 Drive Time Analysis – Wellingborough HWRC .....             | 83 |
| Table 8.8 Drive Time Analysis – Corby HWRC .....                      | 84 |
| Table 8.9 Drive Time Analysis - Rushden .....                         | 85 |
| Table 8.10 Drive Time Analysis - Kettering .....                      | 86 |
| Table 8.11 Drive Time Analysis – Total HWRC Network .....             | 87 |
| Table 8.12 Drive Time Analysis (HWRC Network including new site)..... | 88 |
| Table 8.13 New HWRC Site Drive Time Analysis.....                     | 89 |

## Figures in Text

|                                      |   |
|--------------------------------------|---|
| Figure 1.1 NNC HWRC Network .....    | 1 |
| Figure 1.2 NNC HWRC throughput ..... | 3 |



|  |    |
|--|----|
| Figure 1.3 Total Headline Arisings from Each HWRC (tonnes) - 2022/23.....            | 10 |
| Figure 1.4 Proportion of Headline Arisings Managed at Each HWRC – 2022/23.....       | 10 |
| Figure 1.5 Corby HWRC Congestion .....   | 11 |
| Figure 1.6 Additional Space Available on the Kettering HWRC .....                    | 12 |
| Figure 1.7 Kettering HWRC Education Block .....                                      | 13 |
| Figure 1.8 Rushden HWRC Unloading Bays.....  | 13 |
| Figure 1.9 Split Level Site .....  | 14 |
| Figure 1.10 Rushden Weighbridge.....   | 14 |
| Figure 1.11 Parking and Access Ramps at the Wellingborough HWRC .....                | 15 |
| Figure 1.12 Total HWRC Network Drive Time Analysis.....                              | 16 |
| Figure 2.1 NNC Current E-Permit Scheme.....  | 24 |
| Figure 5.1 Area Surrounding Existing Corby HWRC .....                                | 38 |
| Figure 5.2 Redundant Area / Possible New Access Surrounding Existing Corby HWRC .... | 39 |
| Figure 5.3 Theoretical new HWRC location.....  | 42 |
| Figure 5.4 Additional HWRC - theoretical network drive time .....                    | 43 |
| Figure 6.1 Sorting Table Example - Bristol Waste .....                               | 48 |
| Figure 7.1 Indicative Service Delivery Timeline .....                                | 50 |
| Figure 7.2 Inhouse and Contracted Service Envisaged Organograms .....                | 57 |

## Appendices

|                   |                                   |
|-------------------|-----------------------------------|
| <b>Appendix A</b> | <b>HWRC Opening hours</b>         |
| <b>Appendix B</b> | <b>Benchmarking Questionnaire</b> |
| <b>Appendix C</b> | <b>Key Assumptions</b>            |
| <b>Appendix D</b> | <b>Travel Distances</b>           |



## Acronyms and Abbreviations

|       |  |
|-------|--|
| HWRC  | Household Waste Recycling Centre                   |
| NNC   | North Northamptonshire Council                     |
| FTE   | Full Time Equivalent                               |
| Kg/hh | Kilograms per Household                            |
| DEFRA | Department for Environment, Food and Rural Affairs |
| EPR   | Extended Producer Responsibility                   |
| DRS   | Deposit Return Scheme                              |
| POPs  | Persistent Organic Pollutants                      |
| WUDS  | Waste Upholstered Domestic Seating                 |





## 1.0 HWRC Network Assessment

This North Northamptonshire Council (NNC) Household Waste Recycling Centre (HWRC) service review has been developed using information gathered from site visits to each of the facilities during July 2023, supported by information supplied by NNC and broader desk-based research. The background to the existing services, including an overview of each facility, supporting performance and policy information are used to produce a best practice assessment of the current services. A range of future considerations are then discussed to help advise future service provision.

### 1.1 Current Service Overview

NNC's network of four HWRCs serves an area of 987 km<sup>2</sup> containing approx. 155,000 households. The location of the HWRCs has been influenced by population density and legacy Council decisions, meaning that the HWRCs are situated in the four main towns within the Council's boundary: Corby, Rushden, Wellingborough and Kettering as shown in Figure 1.1.

Figure 1.1 NNC HWRC Network



In 2023/24, the Council has a budget full year spend of £2.7 million. A high-level breakdown sourced from the Council's budget book is shown in Table 1.1.

**Table 1.1 High level NNC HWRC Budget 2023/24**

| Account Description                         | Full Year Budget (£) |
|---|----------------------|
| Building Repair and Maintenance             | 4,000                |
| Rents and Leases                            | 55,650               |
| Waste Disposal                              | 155,998              |
| Specialist Waste Disposal                   | 353,917              |
| Landfill Tax                                | 663,735              |
| HWRC Contracts                              | 1,539,130            |
| Waste Transportation                        | 322,020              |
| Internal Recharges                          | 7,110                |
| Cost recovery from Outside Bodies           | -384,060             |
| Issue of Certificates, Permits and Licences | -24,010              |
| <b>Total service spend</b>                  | <b>2,693,490</b>     |

## 1.2 Arisings

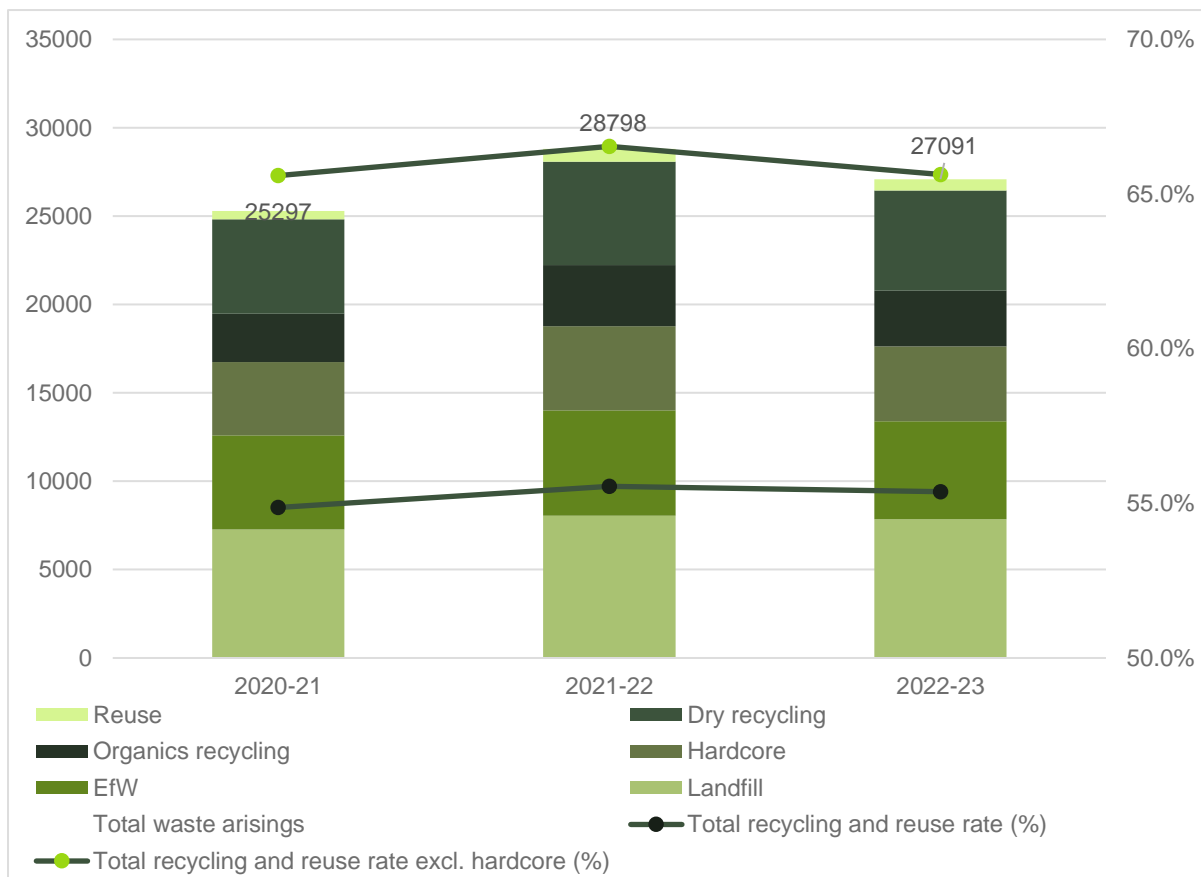
In 2021/22, NNC generated 562.9 kg/hh of residual waste compared to the English average of 547 kg/hh, suggesting that households within NNC generate slightly more residual waste than other households across the country. However, within the East Midlands the yield is significantly higher with 605 kg/hh residual waste generation. NNC recorded a recycling rate of 45% in 2021/22, compared to the English average of 44.1%<sup>1</sup>.

When focusing on the HWRC throughput within NNC, total arisings over the past three years peaked in 2021/22 at 28,798 tonnes, as demonstrated in Figure 1.2.

<sup>1</sup> <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122>



**Figure 1.2 NNC HWRC throughput**



Material arisings from Council services have fluctuated significantly in the past three years primarily owing to the disruption to services and broader impact of the COVID 19 pandemic. This has made future projections typically more challenging in comparison to pre-pandemic years. Societal behaviours have changed, which influence the amounts and types of materials produced. Initial slumps in arisings during 2020/21 rebounded in 2021/22 and for many Councils have declined in 2022/23.

HWRCs play a key role in providing outlets for household waste and improvements in these facilities, with a focus on increasing diversion through reuse and recycling of materials, has the potential to make significant contributions in achieving a wide range of objectives.

The current annual arisings from the HWRC service comprise c.27,000 tonnes of a total of c.170,000 tonnes of materials managed by NNC (16%). Typically, the HWRCs on an annual basis achieve a recycling and composting performance of >65%.

### 1.3 Housing Pressures

Population increases within the Council area between census periods suggest that the population growth is above the national average. This has a knock on impact to housing demand and the area is experiencing a significant build of residential properties. Using planned development data provided by the Council, an indicative forecast can be made on the possible future demand for HWRC services. Three scenarios have been developed to illustrate the possible growth in households and resulting impact on arisings from households, based on the following growth assumptions:

- **Low** – Assumes the net number of new properties completed per annum is 20% below the average observed over the past 10 years



- **Moderate** – Based on continuation of the average net number of new properties completed per annum over the past 10 years
- **High** – Based on achieving 75% of the projected net number of new properties scheduled to be completed up to 2030/31, then from 2031/32 onwards continuation of the average annual completions between 2023/24 and 2030/31

**Table 1.2 Forecast HWRC Tonnage Increases**

| Scenario | Forecast % change in HWRC tonnage to 2038/39 compared to baseline (2022/23) | Potential additional annual HWRC tonnage by 2038/39 |
|----------|---|---|
| Low      | 18%   | 4,860   |
| Moderate | 21%   | 5,670   |
| High     | 26%   | 7,020   |

The forecast suggests that the Council should expect to manage between c.5,000 and c.7,000 extra tonnes per year via its HWRC network. The forecast is subject to a range of factors such as economic conditions, consumer behaviour, the impact of legislation and the continuation of above average population growth within the area.

## 1.4 Relevant Legislation Strategy and Policy

The key English legislation and policy drivers currently in effect, or due to be introduced in the near term, are summarised in Table 1.3. Each of these will link to and present an opportunity for, or otherwise impact on, the current HWRC service, as also highlighted in the table.

**Table 1.3 Legislative Overview with HWRC Service Impacts**

| Legislation / Strategy / Policy                 | Overview   | Potential HWRC Service Impact   |
|---|--|---|
| Waste Framework Directive (2008/98/EC)          | The Waste Framework Directive sets the basic concepts and definitions related to waste management, including definitions of waste, recycling, and recovery   | Clear direction on the way in which waste should be managed in accordance with the waste hierarchy. Currently the existing HWRCs have been designed to move materials primarily from disposal to recycling. Many facilities however do not promote interception of materials suitable for reuse or repair, which goes hand in hand with the duty to ‘promote high quality recycling’. This is an area which will require growing focus as the legislative measures of success become more focused upon carbon reduction and social value. |
| Resources and Waste Strategy for England (2018) | Published by the Department for Food and Rural Affairs (DEFRA), this strategy supersedes the previous Waste Strategy for England (2007) and Waste Management | The strategy contains the following five strategic ambitions: <ul style="list-style-type: none"> <li>•To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025</li> <li>•To work towards eliminating food waste to landfill by 2030</li> </ul>  |



| Legislation / Strategy / Policy              | Overview  | Potential HWRC Service Impact   |
|--|---|---|
|  | <p>Plan for England (2013). The document builds on the direction set out in the 25 Year Environment Plan and presents England's commitment to eliminate avoidable waste, promote resource efficiency and move towards a circular economy – specifically, the RWS defines broad aspirations and objectives for waste management in England, aligning with targets defined by the Circular Economy package.</p> | <ul style="list-style-type: none"> <li>•To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan</li> <li>•To double resource productivity by 2050</li> <li>•To eliminate avoidable waste of all kinds by 2050.</li> </ul> <p>All five strategic ambitions impact the way in which a HWRC should be designed to move materials primarily from disposal to recycling. Facilities should promote interception of materials suitable for reuse or repair. This aims to eliminate avoidable waste, improve resource productivity etc.</p>   |
| <p>Circular Economy Package (CEP) (2018)</p> | <p>A UK wide legislative framework for the reduction of waste and long-term ambitions for waste management and recycling by turning waste into a resource. Broadening the definition of municipal waste to include some businesses and public sector organisations</p>  | <p>Previous studies have indicated that an additional ~29,000 tonnes of recycling per annum could be achieved. This recognition and associated research help support the potential these services have in contributing toward national targets. At a council level this provides the opportunity for councils to review and justify upgrades and changes to existing facilities</p>   |
| <p>The Environment Act (2021)</p>            | <p>The legislative basis to support the implementation of a range of policies designed to protect and improve the environment, including the prevention or reduction of waste. Producer responsibility, resource efficiency, managing waste and waste enforcement under part three of the act all provide the legal foundation for significant change in the waste industry.</p>                              | <p><b>Extended producer responsibility</b><br/>                     Producer responsibility is where manufacturers of products that end up as waste i.e., packaging, pay towards their collection and disposal. The government is proposing to increase the items that need to be paid for and make sure that manufacturers pay the full cost. This proposal also includes the intention to improve information that tells us about the recycled content of products, and whether they can be recycled to help us make informed decisions when buying products. This legislation is due to be implemented in 2025. It could create more opportunity for the UK to make better use of recyclable material and encourage better design of packaging</p> |





| Legislation<br>/ Strategy / Policy              | Overview  | Potential HWRC Service Impact   |
|---|---|---|
|   | <p>The future implementation of a DRS and/or EPR scheme is likely to reduce the tonnages of in-scope materials being received at HWRCs (e.g., plastic containers, glass bottles, steel, and aluminium cans) and therefore impact on potential Council income streams.</p> <p>However, the quantum of this financial impact may be offset or even exceeded by the potential savings derived from a reduction in these materials within the mixed residual waste stream, as householders are incentivised to segregate at source.</p> | <p>that prioritises waste prevention, re-use and recycling rather than disposal.</p> <p><b>Deposit Return Schemes</b><br/>                     These may require a person supplied with an item to pay a deposit which is refunded when that item is collected, e.g., a deposit paid on a drinks bottle that is refunded when the drink is consumed, and the bottle returned. There have been significant delays regarding the implementation of DRS and currently this sees implementation in October 2025.</p> <p><b>Digital Waste Tracking</b><br/>                     The Act allows for future regulations to be made, to introduce an electronic waste tracking system. The system may require information about waste to be entered onto an electronic system by waste controllers (e.g., anyone who imports, produces, keeps, treats, manages or disposes of waste), or waste regulation authorities (e.g., the Environment Agency) about the processing, movement or transfer of waste.</p> <p><b>Plastic Packaging Tax</b><br/>                     The tax is intended to provide a clear economic incentive for businesses to use recycled material in the production of plastic packaging to drive demand for this material. The tax complements a reformed packaging producer responsibility system. The tax applies to businesses that produce (and sell in the UK) or import plastic packaging which uses insufficient recycled content (less than 30%), taking effect from April 2022. For those materials which do not comply, there will be a tax incurred at a rate of £200 per metric tonne of plastic packaging that contains less than 30% of recycled plastic.</p> |
| <p>Waste Management Plan for England (2021)</p> | <p>In January 2021, Defra published a National Waste Management Plan for England to replace the previous one from 2013. The Plan is a</p>   | <p>This continues to highlight the clear direction on the way in which waste should be managed in accordance with the waste hierarchy.</p>  |



| Legislation / Strategy / Policy                           | Overview   | Potential HWRC Service Impact  |
|---|--|--|
|   | <p>high-level document and provides an overview of waste management in England. It explains the current waste management situation in England, the measures being taken to improve waste management and an assessment of existing waste collection schemes.</p>  | <p>The plan does not introduce new policies or change how waste is managed in England. Its aim is to bring current waste management policies together under one national plan.</p>   |
| <p>The Persistent Organic Pollutants Regulations 2007</p> | <p>Regulations governing the production, usage, and safe destruction of persistent organic pollutants.</p>   | <p>Although the regulations have been in place since 2007 with limited impact on HWRC services, recent research, and Environment Agency activity in England is beginning to have huge operational and cost impacts for all HWRCs. This is due to segregation from other materials etc.</p>   |
| <p>EU Transition / EU Revocation Bill</p>                 | <p>Ongoing negotiations between UK government and the EU Commission, which are likely to impact on the strategic direction for waste in 2022 and beyond. The EU Revocation Bills seeks amongst other items to include revocation, re-enactment, or amendment at Ministerial discretion. Producing the potential for significant divergence from existing EU environmental laws</p> | <p>The EU Revocation Bill has the potential to change much of the existing and long-established legislation which underpins the methods of operating HWRC services. It is currently unknown to what extent this will affect the HWRC service, but it could represent a broad range of changes in overarching strategy, compliance and operations which will need to be understood and managed</p>            |
| <p>DIY Waste Charging at HWRCs</p>                        | <p>The government set out plans in April 2022 to ban charges for DIY waste at household waste and recycling centres (HWRCs) as part of efforts to crack down on fly-tipping. On the 18th June 2023 it was confirmed these plans would be put into place later on this year.</p>  | <p>The government estimated that around a third of local authorities charge for certain types of DIY waste and so the ban will impact a large proportion of HWRCs. It will mean Councils may see a reduction in income from their waste. One way to combat this may be through further policing of trade waste at HWRCs through the implementation of booking systems, vehicle registration permits etc.</p> |



| Legislation / Strategy / Policy  | Overview   | Potential HWRC Service Impact   |
|--|--|---|
| Controlled Waste Regulations 2012  | These Regulations came into force on 6 April 2012 and apply to England and Wales. They help to classify waste as household, industrial or commercial waste, and as a result further determine the meaning of "controlled waste".                         | This introduces disposal charges at HWRCs to some non-domestic household waste producers and some premises formerly classified as producers of household waste are now identified as producers of commercial waste.   |
| Waste Wood EA Position statement (RPS 249)   | RPS 249 allows site operators to accept small amounts of certain waste types that would test as hazardous (specifically fence posts and decking), store and classify such materials as non-hazardous and move the materials under a waste transfer note. | RPS 249 will remain in place until April 2024, during which time operators will be required to either introduce an agreed sampling and testing programme to demonstrate that hazardous waste wood is no longer present or apply for a permit variation to handle hazardous waste wood. Once RPS 249 is withdrawn, hazardous waste wood will be required to be segregated on site and consigned as hazardous.  |
| Segregating waste upholstered domestic seating that may contain POPs at HWRCs: RPS 266 | Only mix waste upholstered domestic seating with waste type 'mixed, residual, (or bulky) household waste' – not any other waste stream like wood or metal  | <p>This means Councils must describe the waste as 'mixed waste with waste upholstered domestic seating containing POPs' in waste transfer notes.</p> <p>NNC must send waste upholstered domestic seating and any mixed, residual, (or bulky) household waste with which it has been mixed with, for destruction to a:</p> <ul style="list-style-type: none"> <li>• municipal waste incinerator</li> <li>• hazardous waste incinerator</li> <li>• cement kiln</li> </ul> <p>The need to manage waste containing POPs separately has represented an unbudgeted burden to Councils with domestic seating believed only to be the start of potential future separations. The impact on Councils is yet to be fully understood in the longer term, but the requirement to separate has placed pressures on many Councils with constrained HWRCs both in a practical and financial sense.</p> |





## 1.5 Current Contract Provisions

North Northamptonshire Council is a new Unitary Authority. April 2021 saw the amalgamation of services and functions provided by the former Borough Councils of Corby, Kettering, and Wellingborough and the District of East Northamptonshire, as well as half of the former Northamptonshire County Council.

The current HWRC management contract commenced in April 2010 and is a fifteen-year contract, ending on the 31st of March 2025. The current contract was procured by the former County Council for the whole of Northamptonshire and comprises a network of nine HWRCs.

The current Contract is managed by a dedicated Waste Management Officer working for the Council and remains as one contract under a hosting arrangement with West Northamptonshire Council, until it expires in 2025. The contracted provisions are delivered by Urbaser Ltd.

There are four North Northamptonshire HWRCs located in Corby, Kettering, Rushden, and Wellingborough. Kettering and Rushden both have weighbridges and accept Trade Waste as part of a service operated by the current contractor. Of the four sites, three are Council owned land, but the Corby site is currently on leased land, owned by SUEZ.

## 1.6 Individual HWRC Overview

Information relating to the existing provision of HWRCs by NNC has been developed using material held by the Council and has been supplemented with site visits conducted during July 2023 and subsequent analysis by SLR. The following section provides headline performance information and an overview of each facility.

A breakdown of arisings and performance seen at each HWRC across North Northamptonshire in 2022/23 is shown in Table 1.4.

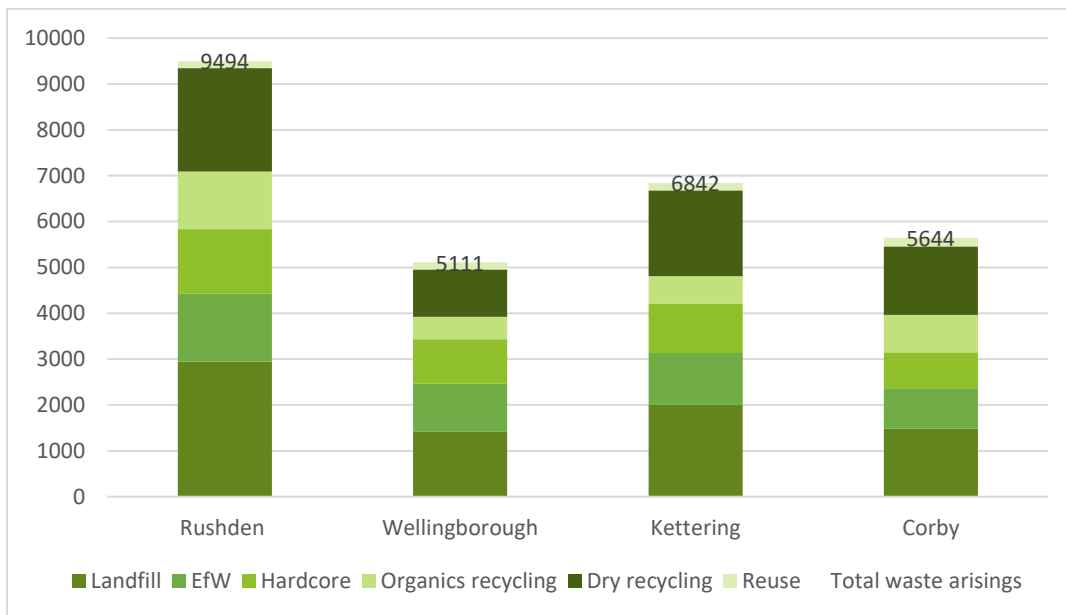
**Table 1.4 HWRC Performance Overview**

|                         | Rushden | Wellingborough | Kettering | Corby | Total      |
|-------------------------|---------|----------------|-----------|-------|------------|
| Total HWRC Arisings (t) | 9,494   | 5,111          | 6,842     | 5,644 | 27,091     |
| Contribution            | 35%     | 19%            | 25%       | 21%   |            |
| Diversion to Landfill   | 69%     | 72%            | 71%       | 74%   | <b>71%</b> |

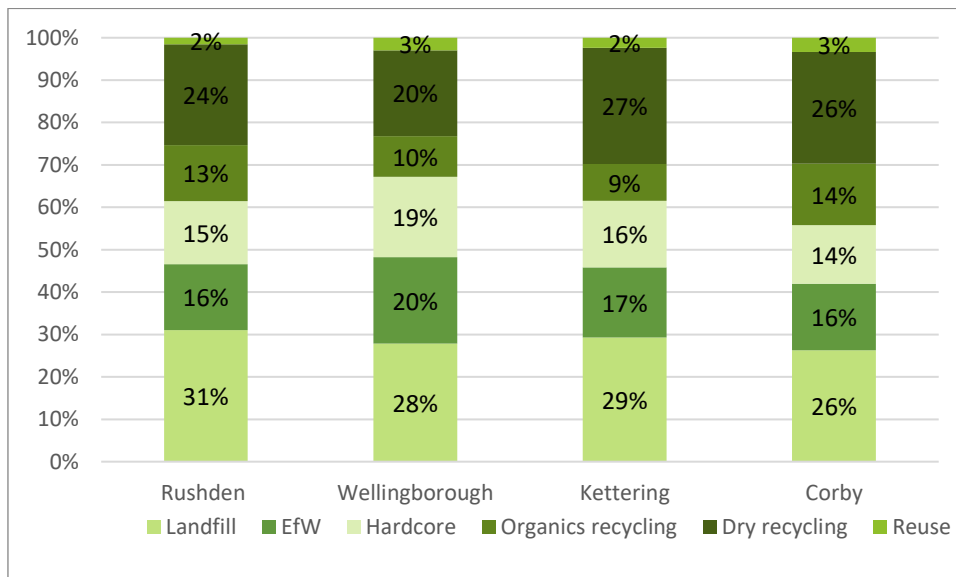
Figure 1.4 **Error! Reference source not found.** highlights the headline arisings from each HWRC in NNC, demonstrating that Rushden HWRC has the largest throughput. Figure 1.4 highlights the proportion of headline arisings managed at each HWRC, suggesting that Kettering HWRC collects the largest proportion of dry recyclables and Corby collects the highest proportion of organics.



**Figure 1.3 Total Headline Arisings from Each HWRC (tonnes) - 2022/23**



**Figure 1.4 Proportion of Headline Arisings Managed at Each HWRC – 2022/23**



## 1.7 Usage

All four HWRC sites within NNC have automatic number-plate recognition (ANPR) systems installed. Table 1.5 highlights the ANPR Data analysis available on a site-by-site basis and this is discussed further in Section 2.2.1.1.



**Table 1.5 ANPR Data Analysis by Site <sup>2</sup>**

|                                  | Corby  | Kettering | Rushden | Wellingborough | All Sites |
|----------------------------------|--------|-----------|---------|----------------|-----------|
| Total visitor numbers (52 weeks) | 98,503 | 92,985    | 167,450 | 99,628         | 458,566   |
| % of total visitors              | 21%    | 20%       | 37%     | 22%            | 100%      |
| Average (52 weeks)               | 1,894  | 1,788     | 3,220   | 1,916          | 8,819     |

## 1.8 HWRC Descriptions

### 1.8.1 Corby HWRC

The Corby HWRC is the only facility which is not owned by the Council. It is similar in nature to Wellingborough, with containers and access ramps organised on the same level. Traffic enters the HWRC via a small access road before circulating in a clockwise direction around the main bulk material containers.

During the site visits a small shoot off lane and low-level skip was being used for the delivery of garden waste close to the start of the circulation loop. This facility appeared to create a bottle neck of traffic at the site which has the potential to back up on the fast-moving connecting road. Since the visit it is understood that the site has been re organised to mitigate this issue. Figure 1.5 highlights the level on congestion seen on the site, at the time of site visit.

**Figure 1.5 Corby HWRC Congestion**



Small, less bulky materials are segregated around the outside of the traffic circulation route and large containers, access ramps and plant activity are contained within the central area of the site. The condition of the facility, both in terms of the built environment and containers,

<sup>2</sup> Taken using the most recent 52 weeks of ANPR data provided from 20/06/22-12/06/23



appeared to be in poorer condition in comparison to the other HWRCs and are anticipated to be close to or at the end of their operational life.

### 1.8.2 Kettering HWRC

In 2011/12 the Kettering HWRC was relocated to a split-level site. There is a one-way circular system around the split-level site, with a weighbridge to accept trade waste and good signage throughout. Background information suggests that the site can suffer from traffic build up in the connecting roads, which has led to temporary site closures in recent months.

The site has a large footprint, although observations from site visits suggest the use of the entire area is underutilised in certain areas. An example of this is illustrated in Figure 1.6, which shows a low area of the site currently used for bring bank type collection of materials including textiles and glass.

A large area on the operational side of these collection points appeared under used. There is also additional space within the middle of the site. This is currently used for plant movement and storage but could potentially be used better, either in terms of traffic control or additional material collections. These areas represent space that could be developed in the future to provide additional capacity for materials or stacking traffic.

**Figure 1.6 Additional Space Available on the Kettering HWRC**



Additionally, the site is home to an education block, which currently isn't used but could be utilised in a different way as a reuse shop, repair centre or a contractor's office location, if the service was to be contracted out moving forward<sup>3</sup>. The education block is shown in Figure 1.7.

---

<sup>3</sup> It should be noted that during the site visits the interior of this block was not observed therefore its overall suitability for future development should not be progressed without further investigation.



**Figure 1.7 Kettering HWRC Education Block**



### **1.8.3 Rushden HWRC**

The Rushden HWRC was upgraded most recently in 2015. This renovation incorporated an additional traffic lane, which has been beneficial in handling additional traffic. The site follows a horseshoe shaped one way system, and traffic stacking is available for approximately 30-40 cars. The unloading bays are displayed in Figure 1.8.

**Figure 1.8 Rushden HWRC Unloading Bays**



The site is split over two levels with a lower operational area housing the large material skips and plant activity. The higher level contains a range of smaller, less bulky collection points and is well organised. This is displayed in Figure 1.9.





**Figure 1.9 Split Level Site**



The signage on the site is good, but the overhead signage is likely to need updating as this has become faded over the course of time.

The site also has a weighbridge (see Figure 1.10) and accepts trade waste. A dedicated lane on the entrance route is used to control trade traffic and administer the relevant charging scheme. This service is operated by the contractor who is contractually obligated to share a proportion of income with the Council. Observations from site visits suggest that there is some potential at the site for expansion within the existing footprint, details of which are discussed in Section 4.2.

**Figure 1.10 Rushden Weighbridge**



#### **1.8.4 Wellingborough HWRC**

The entrance of the Wellingborough HWRC is on an industrial estate, next to the entrance of a steel manufacturer, where large freight often queues outside the site and can block the entrance to the HWRC, which can lead to further congestion at the entrance of the HWRC.

The size of the site restricts the operations, capacity and capabilities of the HWRC, and measures have been put in place to create as much space as possible. However, there is very limited car stacking capabilities on the site and congestion can build up quickly.



Residents were observed to mostly park their vehicles by driving forward into the designated parking spaces. This inherently requires a large proportion of traffic movements to occur in reverse, potentially increasing the risk of collisions on site.

Once parked, site users then unload their vehicles and carry bulk items across the traffic lane and up the access ramps. This activity is likely to be strenuous for many users and does not represent best practice in HWRC design by modern standards.

**Figure 1.11 Parking and Access Ramps at the Wellingborough HWRC**



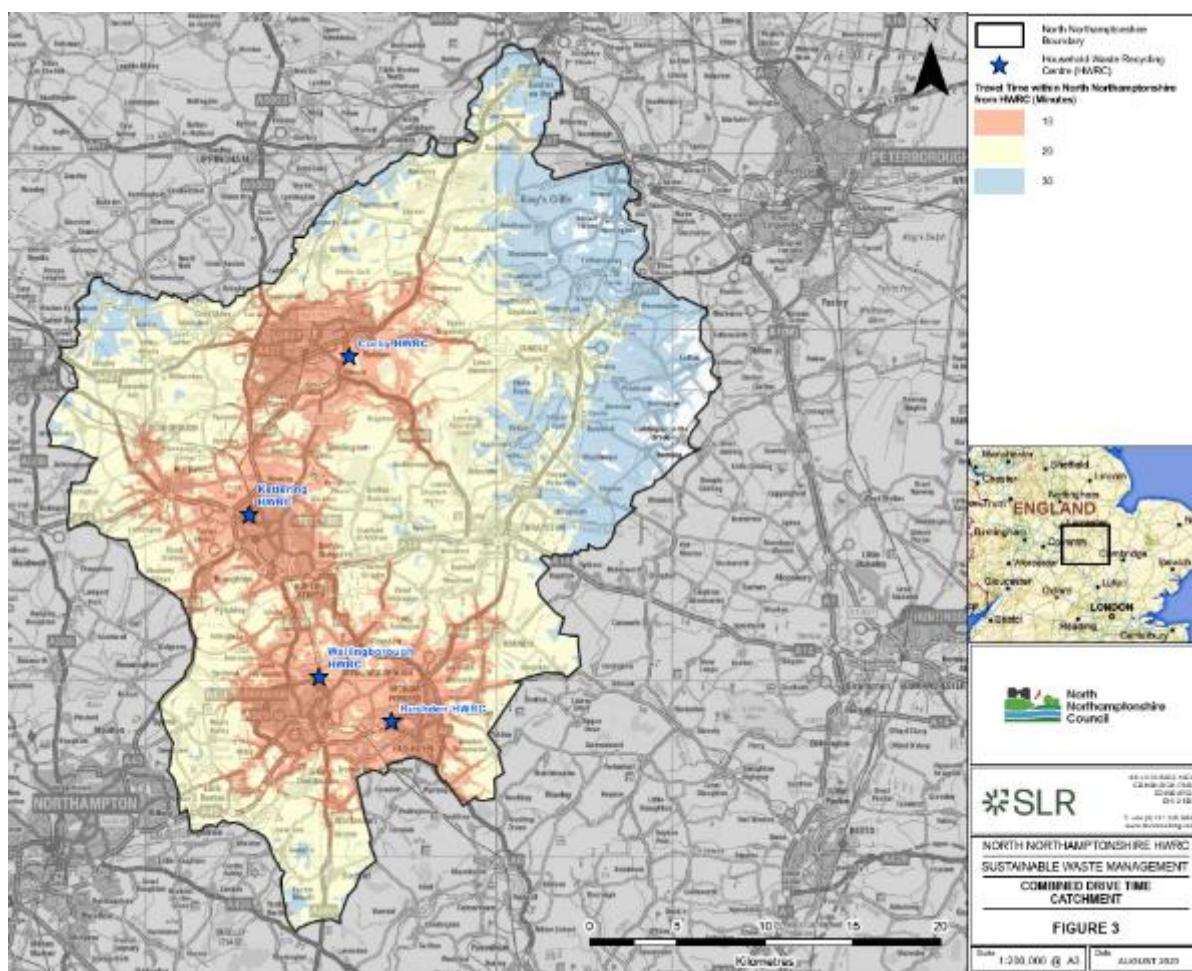
## 1.9 HWRC Drive Time Analysis

Customer drive time to an HWRC can be used to assess the extent and overlap of service provision, which can be helpful in determining whether the distribution of HWRC is sufficient for the Council's population.

An analysis of the existing network has been conducted using NNC housing and road network information. Drive times of 10, 20 and 30 minutes have been calculated and plotted to illustrate how long NNC residents need to travel to reach their nearest HWRC, as shown below in Figure 1.12.



**Figure 1.12 Total HWRC Network Drive Time Analysis**



The distribution of HWRCs within the NNC boundary is concentrated in the mid to southern area, with an HWRC being present in each of the four most highly populated towns. This positioning has been influenced by legacy decisions reaching back to pre-unitary status and historic standards of facility design and operation.

The drive time analysis results displayed in Table 1.6, suggest that 98% of the population is located within 30 minutes of a HWRC within the NNC network, which is likely due to the good road across the Council area. WRAP HWRC Guidance 2018<sup>4</sup> suggests 'maximum driving times for the great majority of residents in good traffic conditions should be 20 minutes, rising to 30 minutes in very rural areas.'

Analysis of drive times suggests that the existing location of HWRCs is good and can be accessed by the vast majority of residents within 20 minutes. An area to the northeast of the Council area is not as well served, but the concentration of households in this area is relatively sparse. A full illustration of each HWRCs drivetime sphere can be viewed in Appendix D - Travel Distances. Table 1.7 highlights the drive time analysis for each individual HWRC.

<sup>4</sup> <https://wrap.org.uk/resources/guide/household-waste-recycling-centre-hwrc-guide>





**Table 1.6 Drive Time Analysis from all HWRCs**

|              | Total Count and Percentage of Households |                         |                         |                    |
|--------------|--|-------------------------|-------------------------|--------------------|
|              | 0 to 10 Mins from HWRC                   | 10 to 20 Mins from HWRC | 20 to 30 Mins from HWRC | >30 Mins from HWRC |
| No. of HH    | 119,321                                  | 29,833                  | 6,102                   | 661                |
| % of HH      | 75.91%                                   | 18.98%                  | 3.88%                   | 0.42%              |
| Cumulative % | 75.91%                                   | 94.8%                   | 98.68%                  | 99.1%              |

**Table 1.7 Drive Time Analysis from each HWRC**

| Household Waste Recycling Centre |              | Total Count and Percentage of Households |         |         |       |
|----------------------------------|--------------|--|---------|---------|-------|
|                                  |              | Drive Time (Minutes)                     |         |         |       |
|                                  |              | 0 - 10                                   | 10 - 20 | 20 - 30 | >30   |
| Kettering HWRC                   | % of HH      | 25.38%                                   | 58.19%  | 12.30%  | 4.12% |
|                                  | Cumulative % | 25.38%                                   | 83.57%  | 95.87%  | 100%  |
| Rushden HWRC                     | % of HH      | 32%                                      | 31%     | 29%     | 6.91% |
|                                  | Cumulative % | 32%                                      | 64%     | 93%     | 100%  |
| Corby HWRC                       | % of HH      | 18.82%                                   | 35.53%  | 42.42%  | 3.24% |
|                                  | Cumulative % | 18.82%                                   | 54.35%  | 96.77%  | 100%  |
| Wellingborough HWRC              | % of HH      | 23.34%                                   | 47.31%  | 23.32%  | 6.02% |
|                                  | Cumulative % | 23.34%                                   | 70.65%  | 93.97%  | 100%  |



## 2.0 Current HWRC Policy

NNC currently operates a number of policies at their sites which are in line with neighbouring authorities and best practice. This information has been based on information published on the NNC website supported by feedback from site visits.

### 2.1.1 Vehicle Access

Introducing a policy to control vehicle access enables restrictions to be placed on the types of vehicles which can enter the HWRC.

NNC currently operates an e permit scheme for vans and larger vehicles which help to reduce the risk of 'Trade waste abuse', based on the assumption that larger vehicles are predominantly used as commercial vehicles. This type of intervention encourages site managers to take responsibility for acknowledging the presence of all vans entering site and requesting photo ID and proof of residency.

In areas where the proportion of the population with privately owned cars may be lower, it is important to remember that a resident may have hired the van, and in such cases, they should be requested to provide proof of hire.

NNC currently has an e-permit system in place for all commercial-type vehicles including hired vehicles accessing the sites. This is in line with NNC's neighbouring authorities, seven out of the eight of which have a vehicle permit scheme in place. However, where in many cases the permit applies to vans and trailers only, in other authorities (including Bedfordshire Council) a permit is required for any vehicle entering and disposing of waste at the HWRC.

### 2.1.2 Cross Border Policies

NNC does not have any formal arrangements in place with any neighbouring authorities to allow for residents from other authorities disposing waste at NNC HWRCs. This prevents additional disposal fees, discourages border traffic from out of the Council area and reduces site congestion, resulting in smaller queuing times for residents. In addition, this is a complementary step to further reduce Trade waste abuse from businesses.

In other neighbouring authorities where permits have been put in place for all vehicle types, the permit usually also requires the permit holder to be a resident of the respective authority area. This is seen in Rutland Council whose website states, 'you need to be a Rutland resident and register your vehicle on our automatic number plate recognition system (if you've not already registered this) to use the centres<sup>5</sup>.'

### 2.1.3 Material Acceptance

The table below (Table 2.1) highlights the list of materials accepted throughout the NNC HWRC network. This is an extensive list, and the current segregation of materials is considered good. However, there are opportunities to provide improved recycling outcomes for smaller or traditionally more difficult materials.

---

<sup>5</sup> [Household waste and recycling centres | Rutland County Council](#)



The Council has indicated that the level of contamination found in their cardboard is high and to deal with this have put fencing, with a letterbox style gap, to prevent contamination and enforce flat packed cardboard.

**Table 2.1 North Northamptonshire HWRC Material Acceptance**

| Material                    | Corby | Kettering | Rushden | Wellingborough |
|-----------------------------|-------|-----------|---------|----------------|
| Car & automotive parts      | X     | X         | X       | X              |
| Cardboard                   | ✓     | ✓         | ✓       | ✓              |
| Cartons                     | ✓     | ✓         | ✓       | ✓              |
| Aerosols                    | ✓     | ✓         | ✓       | ✓              |
| Antifreeze                  | ✓     | ✓         | ✓       | ✓              |
| Asbestos                    | X     | X         | X       | X              |
| Bricks                      | ✓     | ✓         | ✓       | ✓              |
| Cooking oil                 | ✓     | ✓         | ✓       | ✓              |
| Fire extinguishers          | ✓     | ✓         | ✓       | ✓              |
| Fluorescent tubes           | ✓     | ✓         | ✓       | ✓              |
| Foil                        | ✓     | ✓         | ✓       | ✓              |
| Food tins & drink cans      | ✓     | ✓         | ✓       | ✓              |
| Fridges & freezers          | ✓     | ✓         | ✓       | ✓              |
| Garden waste                | ✓     | ✓         | ✓       | ✓              |
| Gas canisters               | ✓     | ✓         | ✓       | X              |
| General waste               | ✓     | ✓         | ✓       | ✓              |
| Hardcore & rubble           | ✓     | ✓         | ✓       | ✓              |
| Hard plastics               | ✓     | ✓         | ✓       | ✓              |
| Large appliances            | ✓     | ✓         | ✓       | ✓              |
| Low energy bulbs            | ✓     | ✓         | ✓       | ✓              |
| Mixed glass, bottles & jars | ✓     | ✓         | ✓       | ✓              |
| Oil filters (automotives)   | ✓     | ✓         | ✓       | ✓              |
| Mobile phones               | ✓     | ✓         | ✓       | ✓              |



| Material                     | Corby | Kettering | Rushden | Wellingborough |
|------------------------------|-------|-----------|---------|----------------|
| Paint                        | ✓     | ✓         | ✓       | ✓              |
| Paper                        | ✓     | ✓         | ✓       | ✓              |
| Plasterboard                 | ✓     | ✓         | ✓       | ✓              |
| Plastic bottles              | ✓     | ✓         | ✓       | ✓              |
| Portable batteries           | ✓     | ✓         | ✓       | ✓              |
| Scrap metal                  | ✓     | ✓         | ✓       | ✓              |
| Sharps                       | X     | X         | X       | X              |
| Shoes                        | ✓     | ✓         | ✓       | ✓              |
| Small electrical appliances  | ✓     | ✓         | ✓       | ✓              |
| Soils                        | ✓     | ✓         | ✓       | ✓              |
| Textiles                     | ✓     | ✓         | ✓       | ✓              |
| TVs & monitors               | ✓     | ✓         | ✓       | ✓              |
| Tyres                        | X     | X         | X       | X              |
| Upholstered domestic seating | ✓     | ✓         | ✓       | ✓              |
| Used engine oil              | ✓     | ✓         | ✓       | ✓              |
| Weed killer                  | X     | X         | X       | X              |
| Wood and timber              | ✓     | ✓         | ✓       | ✓              |

### 2.1.4 Trade Waste Enforcement

Trade waste enforcement is a key consideration at HWRCs as, if Trade waste is allowed to enter the site unchecked, problems can arise including:

- congestion on site, deterring householders from using the site;
- associated reporting problems with Trade and household waste segregation;
- additional capacity pressures to current waste and recycling streams;
- the significant cost of additional disposal; and
- lack of separation into different recycling streams.

NNC accepts Trade waste at two HWRC sites, Kettering and Rushden. The two sites are the only sites with weighbridges and trade waste is accepted as part of a service operated by the current Contractor. The sites do not accept trade waste at weekends and therefore the service is only available 3 days a week, which potentially adds to site congestion at busier times.



Trade waste is subject to a fee, which is highlighted in Table 2.2. This can provide an additional source of income for Councils, but transactions on the site must be monitored to ensure Trade waste is not being disposed of by residents without paying.

**Table 2.2 North Northamptonshire HWRC Trade Waste Fee**

| Material                                 | 0 to 80kg | 81 to 150kg | 151 to 250kg | 251 to 500kg | 501 to 750kg | 751 to 1,000kg | >1,000kg (per tonne, pro-rata increase of 500kg) |
|--|-----------|-------------|--------------|--------------|--------------|----------------|--|
| Hardcore & rubble                        | £7        | £15         | £21          | £22          | £25          | £38            | £19  |
| Garden waste                             | £7        | £13         | £23          | £36          | £49          | £67            | £34  |
| Plasterboard                             | £17       | £30         | £46          | £89          | £129         | £171           | £87  |
| Wood & timber                            | £12       | £17         | £27          | £44          | £61          | £96            | £48  |
| Mixed paper & card                       | £5        | £11         | £15          | £16          | £28          | £33            | £17  |
| General waste (exc. upholstered seating) | £26       | £41         | £59          | £109         | £152         | £187           | £88  |
| Upholstered seating                      | £59       | £93         | £133         | £246         | £343         | £422           | £199   |

The Council's e-permit allows for vans up to 3.5t (but not tippers) to enter the HWRCs. This is a 'large transit' van size, and is the largest vehicle permitted on a full driving licence. To combat Trade waste users, other neighbouring authorities visually check vans / transits for Trade waste or do not permit vans, trailers or tipper vehicles on the site.

## 2.2 Policy Review

Variation amongst HWRC provision often relates to the suite of policies developed by individual Councils in response to a variety of service pressures including budgetary and regulatory challenges. As NNC progresses toward a new period of service delivery an opportunity to review, update or amend its approach to certain policies exists. A review of existing policies using available background information supplied by the Council and supplementary desk based research is discussed in the following sections.

### 2.2.1 Opening Hours

Opening hours of HWRCs have received increased attention over the past 5 to 10 years across the UK as Councils seek to strike an appropriate balance between availability to serve their populations and finding ways of reducing operating costs.

As a result, there is now a wide variety of approaches to how access to HWRCs is provided, with some local authorities choosing to reduce their overall availability. In some instances, this has resulted in the implementation of reduced hours or closures during weekdays, whilst retaining the longest daily opening times during weekends.

NNC currently provides HWRC availability from 10am to 6pm all year round, five days a week, with Corby and Wellingborough closed on Wednesdays and Thursdays and Kettering and Rushden closed on Mondays and Tuesdays. There is no reduction in opening hours during winter months.



In comparison to authorities bordering NNC, this level of availability represents below average opening hours (Table 2.3). The full list of neighbouring HWRC facilities opening times can be viewed in Appendix A. Detailed analysis of opening times, taking into account variations across individual days, shows that of the eight neighbouring authorities, NNC ranks joint 6<sup>th</sup> for its summer opening hours and 6<sup>th</sup> for its winter hours in terms of total hours available.

The average typical availability for a week (Mon -Sun) during the summer period across the neighbouring authorities is 51 hours and NNC provides 40 hours. The average winter availability is 45.5 hours and NNC provides 40 hours. A summary of the total number of hours at NNC HWRCs and those of its neighbouring authorities is presented in Table 2.3.

**Table 2.3 NNC and Neighbouring Authorities - Total Availability Hours**

| HWRC Total Availability Hours |                   | Sum of Hours |        |
|-------------------------------|-------------------|--------------|--------|
|                               |                   | Summer       | Winter |
| North Northamptonshire        | Corby             | 40           | 40     |
|                               | Kettering         | 40           | 40     |
|                               | Rushden           | 40           | 40     |
|                               | Wellingborough    | 40           | 40     |
| Rutland                       | Cottesmore        | 32           | 24     |
|                               | North Luffenham   | 48           | 36     |
| Harborough                    | Kibworth          | 50           | 50     |
|                               | Market Harborough | 50           | 50     |
| West Northamptonshire         | Brixworth         | 40           | 40     |
|                               | Daventry          | 40           | 40     |
|                               | Farthinghoe       | 56           | 56     |
|                               | Ecton Lane        | 40           | 40     |
|                               | Sixfields         | 40           | 40     |
|                               | Towcester         | 40           | 40     |
| Milton Keynes                 | Bleak Hall        | 84           | 63     |
|                               | Newport Pagnell   | 84           | 63     |
|                               | New Bradwell      | 84           | 63     |
| Bedford                       | Barkers Lane      | 58           | 56     |
| Huntingdonshire               | Alconbury         | 63           | 53     |
|                               | Bluntisham        | 63           | 53     |
|                               | St Neots          | 70           | 70     |
| City of Peterborough          | Fengate           | 70           | 49     |
| South Kesteven                | Grantham          | 35           | 35     |



Increasing the existing hours of availability would likely increase cost to the Council and could potentially cause confusion to HWRC users during a period of transition. The opening hours policy should be reviewed in conjunction with clear service priorities and objectives. The Council should also consider monitoring footfall to identify particularly 'light' periods or as discussed, a booking system could be used to optimise throughput of users.

### 2.2.1.1 Traffic Flows and Usage Analysis

The ANPR data available for the four HWRC sites is useful to provide a review of user visits on a daily and seasonal basis, to help identify whether changes to opening hours or staff provision would be beneficial. Table 2.4 suggests that the Rushen HWRC is the busiest NNC location, accounting for 37% of the total HWRC visits within the past year.

**Table 2.4 ANPR Data Analysis by Site <sup>6</sup>**

|                                  | Corby  | Kettering | Rushden | Wellingborough | All Sites |
|----------------------------------|--------|-----------|---------|----------------|-----------|
| Total visitor numbers (52 weeks) | 98,503 | 92,985    | 167,450 | 99,628         | 458,566   |
| % of total visitors              | 21%    | 20%       | 37%     | 22%            | 100%      |
| Average (52 weeks)               | 1,894  | 1,788     | 3,220   | 1,916          | 8,819     |

When summer and winter ANPR data is compared (as displayed in Table 2.5), this suggests that the average number of visits to each HWRC drops in winter compared to summer (a total of 255,255 visits recorded across all sites in the summer months (c.9,800 visits per week), compared to 204,311 visits in the winter months (c.7,900 visits per week), a reduction of 24.4%).

**Table 2.5 ANPR Data Analysis by Site and Summer / Winter Opening Hours<sup>7</sup>**

|                           | Corby  |        | Kettering |        | Rushden |        | Wellingborough |        |
|---------------------------|--------|--------|-----------|--------|---------|--------|----------------|--------|
|                           | Summer | Winter | Summer    | Winter | Summer  | Winter | Summer         | Winter |
| Total visitors (52 weeks) | 54,752 | 43,751 | 50,336    | 42,649 | 92,745  | 74,705 | 56,422         | 43,206 |
| % of total visitors       | 22%    | 21%    | 20%       | 21%    | 36%     | 37%    | 22%            | 21%    |
| Average (52 weeks)        | 2,106  | 1,683  | 1,936     | 1,640  | 3,567   | 2,873  | 2,170          | 1,662  |

This could represent an opportunity to consider whether winter availability should be reduced and summer availability increased, without changing the overall annual availability.

To Note: In August 2023 the ANPR camera at Kettering was to be intermittently obscured by foliage which had impacted the recording of visitor numbers. As such traffic number were reviewed in the weeks since the foliage has been cutback, this shows the number of vehicles at Kettering has increased by about 200+ vehicles a day, this alters the visitor spread over the sites, and puts Kettering as the second busiest site.

| Corby         | Kettering     | Rushden       | Wellingborough |
|---------------|---------------|---------------|----------------|
| <b>21.52%</b> | <b>23.02%</b> | <b>33.72%</b> | <b>21.74%</b>  |

<sup>6</sup> Taken using the most recent 52 weeks of ANPR data provided from 20/06/22-12/06/23

<sup>7</sup> Taken using the most recent 52 weeks of ANPR data provided from 20/06/22-12/06/23  
Summer opening hours is assumed to be from (01/04-30/09), Winter (01/10-31/03)



## 2.2.2 Permit Schemes

### 2.2.2.1 NNC Permit Scheme

NNC currently has an e-permit system in place for all commercial-type vehicles including hired vehicles accessing the sites, as shown in Figure 2.1<sup>8</sup>. The e-permit applies to residents taking their waste to HWRCs in the unitary authority area and limits commercial-type vehicles and trailers to six visits over a 12-month period. NNC uses the scheme working with its current contractor to minimise the impact of commercial vehicles and commercial being delivered to the HWRCs.

Figure 2.1 NNC Current E-Permit Scheme

The screenshot shows the 'Household Waste Recycling Centre (HWRC) E-Permit Scheme' web interface. At the top, there are logos for North Northamptonshire Council and West Northamptonshire Council. Below the title, a navigation bar contains five steps: 'Start', 'Permit Type', 'Contact Details', 'Vehicle Details', and 'Submit'. The 'Permit Type' step is currently selected. The main content area explains that HWRCs are provided for householders to dispose of their waste from their own home, safely and conveniently for free. It notes that some traders use HWRCs to illegally dispose of their commercial waste, leading to council-tax paying residents of Northamptonshire to foot the bill for tens of thousands of pounds for its disposal. Consequently, like other councils, North Northamptonshire Council, in partnership with West Northamptonshire Council has taken the decision to introduce a simple electronic permit (e-permit) scheme to reduce trade waste abuse. It also states that commercial type vehicles are more likely to be carrying trade waste than a standard car visiting the sites. Therefore, from 1st October 2018 residents using commercial type vehicles, or a car towing a trailer to take waste to any of the 9 household waste recycling centres (HWRCs) in the county will need to apply for a free permit. Below this text, there is a section titled 'What do you want to do?' with three radio button options: 'Apply for a new permit', 'Renew an expired permit', and 'Edit an existing permit (if you have moved house or changed vehicle)'. A 'Next' button is located at the bottom left of the form.

Milton Keynes is the only neighbouring authority which does not operate an e-permit on vans and trailers, suggesting that NNC is currently aligned to its neighbours. However, permits are used in different ways by different Councils. For example, Rutland County Council requires all residents to have a permit to enter the site and both Huntingdonshire District Council and Peterborough City Council allow vans and trailers 12 visits within a 12-month period.

NNC has an ANPR system in place across the four HWRCs. This system is used to count cars but also has the advantage that each car is recorded, enabling monitoring of the frequency of visits, whilst distinguishing between vans and cars. The permit system could be used for more accurate identification of residents, helping to reduce loopholes for abuse from users from outside of the NNC area. Furthermore, a resident's permit could also have the potential to broaden the NNC communications reach via the permit web pages and associated email confirmations.

<sup>8</sup> <https://selfserve.northamptonshire.gov.uk/HWRC-E-Permits/>





In Councils where trade waste abuse is significant, further tightened restrictions can be put in place. This could include issuing permits for one site only (being the site in closest proximity to the residents' property) and, where applicants repeatedly do not provide the required documentation, refusing their application without eligibility to reapply for a defined period (e.g., six months)<sup>9</sup>.

### 2.2.2.2 Current Trade Waste Offering

As discussed in Section 2.1.4, NNC offer Trade rates for recyclable and compostable materials. Dry recyclables, including plastic bottles and mixed glass bottles and jars, are also charged at £5 per load.

Some items cannot be disposed of under the trade waste service and for such cases NNC recommends other Trade waste management companies to be contacted for disposal.

Materials not accepted include:

- asbestos;
- clinical waste;
- engine oil;
- hazardous waste (such as chemicals and radioactive materials);
- motor vehicles and tyres; and
- waste electrical and electronic equipment (WEEE).

The current use of this service appears limited. Two of the HWRCs are well equipped to separately measure trade waste, with dedicated traffic lanes and weighbridges. Should the Council wish to enhance its customer base, a range of communication and awareness activity could be implemented to target new customers. This could include on site signage or adverts in local trade publications or social media platforms.

### 2.2.3 Existing Charging Policies for DIY Waste

On the 18<sup>th</sup> June 2023, Defra<sup>10</sup> announced that households will no longer have to pay to dispose of DIY waste. The changes mean councils will treat DIY waste in the same way as household waste and remove any charging mechanism currently in place.

Four criteria were published to determine the nature of waste being presented:

- the waste is produced by householders whilst carrying out small-scale construction or demolition works at their home;
- the waste does not arise from activities that generate an income for the person who carried them out;
- the waste is not produced on a regular basis requiring HWRC visits more frequently than once a week; and
- the volume of waste is no greater than 300 litres (based on the approximate boot size of a family car).

---

<sup>9</sup> <https://www.letsrecycle.com/news/trade-waste-abuse-sees-flintshire-tighten-hwrc-rules/>

<sup>10</sup> <https://www.gov.uk/government/news/council-diy-waste-charges-abolished#:~:text=The%20Government%20clarified%20the%20law,DIY%20household%20waste%20disposal%20either.>



NNC does place a restriction on the permitted number of deposits of DIY waste by the type of vehicle but makes no charge within the scope of the policy for the material deposited at the HWRCs. Amounts above those allowed within the visit limits are charged.

- a small car can make up to eight free DIY waste trips every 60 days and larger vans, MPVs, 4x4s and campervans can make up to four trips in the same period; and
- larger vehicles including cars towing trailers, pick-ups, vans under 3.5 tonnes and any medium vehicle towing a trailer must apply for an e-permit, where they can make six free DIY waste trips every 365 days.

If more trips are required, the Council will then classify residents waste as trade waste, and such waste can only be disposed of at a cost.

This current policy stance suggests that NNC is currently compliant with the recent change brought in by Defra. However, the Council may wish to consider the extent of enforcement of the existing policy to ensure that loopholes are not in place and the current offering is not being abused.



### 3.0 Benchmarking

For the purpose of comparison, SLR worked with the Council to identify a selection of local authorities which are considered to be reflective of the circumstances applicable to North Northamptonshire, and therefore provide a reasonable basis for benchmarking of the HWRC service which the Council currently provides.

The identified authorities (Central Bedfordshire, Shropshire County, North Somerset, Leicestershire County and Staffordshire County Councils) were shortlisted following consideration of the existing provision of HWRC services (seeking to include a mix of in-house and contracted service authorities), and suitable comparability in terms of rurality and housing numbers.

SLR, working with NNC, approached each council with a questionnaire regarding several different topics including staff costs, waste throughput, performance and contract costs. The questionnaire is provided in Appendix B

Only Central Bedfordshire Council (CBC) provided responses, which we have used to compare to NNC's current HWRC service. Contacts were established for each of the shortlisted councils but, owing to the time of the information request (Aug 2023), it is suspected that resource availability within councils was likely low due to staff holidays, resulting in a poor response rate. Table 3.1 compares NNC to CBC responses. Similarities exist in terms of tonnage throughput and number of operational staff. However, the performance of CBC is slightly higher than NNC, particularly regarding landfill diversion.

**Table 3.1 Benchmarking Review, Central Bedfordshire Questionnaire (2022/23)**

| Local Authority                                      | NNC   | CBC  |
|--|---|--|
| Number of HWRC sites                                 | 4   | 4  |
| Breakdown of operational staff per HWRC (FTE)        | 3 or 4 Operatives<br>2 Agency staff (2 sites)<br>0.75 Drivers   | 4 Operatives<br>2 Reuse shop (1 site only)<br>1.25 Drivers   |
| Breakdown of management staff for HWRC service (FTE) | 1 Supervisor<br>1 Administrator<br>1 Assistant Ops Manager<br>1 Ops Manager<br>1 Waste Service Officer<br>1 Waste Performance Officer<br>1.5 Waste Contract Officer | 1 Contract Development Manager<br>1 Head of Environmental Services<br>1 Data Development Officer<br>1 Finance Officer<br>1 Operations Manager<br>1 Contract Supervisor |
| Total tonnage received inc. rubble                   | 27,091  | 29,888   |
| Household recycling rate                             | Rushden: 64%<br>Wellingborough: 66%<br>Kettering: 65%<br>Corby: 69%   | Amptill: 67%<br>Biggleswade: 69%<br>Leighton Buzzard: 69%<br>Thorn Turn: 58%   |
| Landfill diversion rate                              | Rushden: 69%  | Amptill: 89%   |



| Local Authority           | NNC   | CBC  |
|---------------------------|---|--|
|                           | Wellingborough: 72%<br>Kettering: 71%<br>Corby: 74% | Biggleswade: 88%<br>Leighton Buzzard: 88%<br>Thorn Turn: 82% |
| Operate a booking system? | No  | No   |

SLR has also undertaken a high-level benchmarking exercise using data provided WasteDataFlow<sup>11</sup> and GOV.UK dwelling stock statistical tables<sup>12</sup>.

This analysis seeks to provide an indication of the number of households per HWRC within any one Council area, which is often dependent on the rurality of a council, whereby more rural areas typically have lower numbers of households per HWRC. This information is displayed in Table 3.2.

The number of households per HWRC ranges from between 10,000 (which is significantly low compared to the other benchmarking authorities) and 39,000.

The area covered per HWRC varies between authorities, but ranges between 13,000 hectares and 25,000 hectares.

**Table 3.2 Benchmarking Review, High Level**

| Local Authority               | No. HWRC sites | Total No. HH | HH per HWRC | Area (Hectares) | Hectares per HWRC |
|-------------------------------|----------------|--------------|-------------|-----------------|-------------------|
| NNC                           | 4              | 156,576      | 39,144      | 98,651          | 24,663            |
| Central Bedfordshire Council  | 4              | 127,680      | 31,920      | 71,566          | 17,892            |
| Shropshire Council            | 5              | 149,263      | 29,853      | 123,400         | 24,680            |
| North Somerset Council        | 3              | 100,944      | 33,648      | 39,112          | 13,037            |
| Leicestershire County Council | 14             | 135,501      | 9,679       | 208,092         | 14,864            |
| Staffordshire County Council  | 15             | 395,268      | 26,351      | 262,420         | 17,495            |

Based on the total area served and the total number of households alone, the current provision/ number of HWRCs provided by NNC appears reasonable in comparison to similar/ benchmarked Councils. Focusing on total households per HWRC, NNC does have the greatest ratio which coupled with anticipated housing growth which could suggest the need additional HWRCs in future.

<sup>11</sup> [WasteDataFlow Waste Management](#)

<sup>12</sup> [Live tables on dwelling stock \(including vacants\) - GOV.UK \(www.gov.uk\)](#)



## 4.0 Best Practice Service Review

Based on the information gathered from the site visits, and a review of the existing best practice evidence, an assessment of the entire service provision and individual site has been conducted. There are a number of opportunities that NNC may wish to consider as it designs its next period of service delivery to achieve best practice, which are documented throughout the assessment.

### 4.1 The HWRC Service

The following ratings have been applied for each category to represent SLR's judgement on NNC's current service provision.

**Table 4.1 Table Key**

| Best Practice Rating | Description  |
|----------------------|--|
|                      | Considered to be inadequate to deliver high performance in this category area and requires improvement to meet best practice |
|                      | Provides reasonable performance within this category area but could benefit from some improvement to meet best practice      |
|                      | Considered to represent best practice  |

**Table 4.2 HWRC Best Practice Summary**

| HWRC Best Practice  | NNC Baseline | Explanation to Position   | Comments / Recommendations  |
|---|--------------|---|---|
| <p><b>Range of materials separated for recycling</b></p> <p>The wider the range of materials that are targeted for recycling, the higher the recycling rate, especially bulk materials with high tonnage, such as garden waste, metal, wood, cardboard, and rubble.</p> |              | The Council provides a good range of materials for recycling at all but one of their HWRCs. However due to space restrictions some bulky items are not separated at Corby and Wellingborough. | The Council could improve the number of materials which are collected at its sites, where there is the space to do so. This would positively influence residents to bring a wider range of materials to the sites for recycling and a larger range of materials which can be recycled, also often have a positive influence on recycling behaviour by reinforcing the impression that the prime function of HWRCs is recycling. |
| <p><b>Split-level architecture</b></p>  |              | Two of the HWRCs sites already use split-level architecture. However,   | A split-level design often impacts positively on recycling at bigger sites,   |



| HWRC Best Practice   | NNC Baseline | Explanation to Position  | Comments / Recommendations  |
|--|--------------|--|---|
| <p>A split-level can help sites with higher throughputs to manage materials more efficiently, making it easier for the focus to be on recycling, through easier access to recycling containers and more efficient container servicing.</p>     |              | <p>Wellingborough and Corby operate using ramps. The ramps at the Wellingborough site are particularly steep and could be seen as a barrier by some users.</p>               | <p>benefitting both staff and residents. Providing ground-level access to deposit materials into containers or bays makes it easier for the public to focus on recycling. This allows for site vehicle movements to take place away from customers, resulting in less disruption and more efficient container servicing.</p> <p>Manual handling issues are reduced, as people no longer need to carry bulky loads up ramps to load skips or attempt to throw materials from ground level.</p>   |
| <p><b>On-site communication signage</b><br/>                     Signage that is easily readable and readily understood encourages site users to recycle with confidence and can help reduce contamination into the residual waste stream.</p> |              | <p>The signage at all sites is relatively well placed and plentiful. An opportunity exists to update the older signage with new for the next period of service delivery.</p> | <p>WRAP provides signage templates which would be recommended to be used at all NNC sites. Reference to this guidance could be provided in service specifications.</p> <p>Additionally, there should be signage for directions and instructions on what materials should be recycled where.</p> <p>Signs should also be positioned where all site users can see them, usually elevated and with larger lettering. Symbols and pictures, following a colour coding system are also an easier way to communicate where materials should be placed. This also caters for site users where English is not a first language.</p> |



| HWRC Best Practice   | NNC Baseline  | Explanation to Position   | Comments / Recommendations  |
|--|---|---|---|
| <p><b>Formal re-use systems</b><br/>                     A well-run and prominent re-use system on site raises public awareness, which helps to reinforce the impression that the site's primary focus is the recovery of materials, whether for re-use or recycling</p> | <p style="background-color: #FFD700;"></p> <p style="background-color: #90EE90;"></p> | <p>The Council operates a reuse service at its HWRCs. Items collected at HWRCs are currently intercepted, stored and taken off site by reuse agents.</p> <p>There is a well established network of local shops which sells items recovered for reuse. The overall tonnage capture across all of the HWRCs is considered good in comparison to other systems.</p> <p>However, the systems in place appeared less formal than the core operations, and without meet and greet services repairable and reusable items may be being missed.</p> | <p>Reuse facilities can influence behaviour and so it would be recommended that the Council develops a more formal reuse facilities at or close by to HWRCs. The facilities should be well organised, and a repair workshop potentially at Kettering could also be beneficial.</p>  |
| <p><b>Number of site staff</b><br/>                     The presence of more site staff can increase opportunities to direct site users and help them to increase their recycling efforts e.g., through a 'meet and greet' service</p>                                   | <p style="background-color: #FFD700;"></p>  | <p>The contractor currently has a minimum of three staff members on site at any one time. Additional staff are deployed during the summer months.</p>   | <p>Adequate staffing levels are vital in running a successful HWRC. A sufficient volume of staff is required to manage the segregation of recyclables, police Trade waste, service containers, keep the site safe and tidy and interact with the public.</p> <p>An increase in the number of staff at each site would allow for the engagement with residents to be improved and the capacity for a 'meet and greet' service to be introduced.</p> <p>A 'meet and greet' service can improve operational efficiency with staff informing / encouraging material separation.</p> <p>Deployment of multiple staff members also allows for staff to rotate jobs, increasing experience, competence and interest.</p> |





| HWRC Best Practice  | NNC Baseline | Explanation to Position   | Comments / Recommendations  |
|---|--------------|---|---|
| <p><b>Site-staff / contractor incentives</b></p> <p>Financial incentives to site staff are associated with higher recycling rates. Well-motivated staff are more likely to engage with residents in a bid to improve recycling rates.</p> | n/a          | Detail relating to current staff incentivisation has not been established during the study period.  | <p>Motivating and training staff can make a significant contribution to improving HWRC efficiency. Incentives linked to recycling rates can be useful to encourage staff to interact with the public to maximise recycling.</p> <p>It is recommended if any new policies are introduced at the sites which will involve more work from the operatives, e.g., black bag policy / sort, an incentive related to recycling rate could be introduced to motivate staff to interact with residents and help in the separation process.</p> |
| <p><b>Public awareness-raising measures</b></p> <p>This looks at changing the way residents view the site, away from a 'tip' or 'dump' and towards a recycling centre.</p>  |              | The NNC website still refers to the sites as HWRCs (Household waste and recycling centres) and could consider future rebranding of the service to identify a focus on resources, repair, reuse and community. | <p>Existing examples:</p> <ul style="list-style-type: none"> <li>• Resource centres</li> <li>• Community resource centre</li> <li>• Community recycling centre</li> </ul>   |
| <p><b>Compaction of bulk materials</b></p> <p>Compaction can reduce the number of bulk containers on site, freeing up space to collect other materials to be recycled.</p>  |              | All site uses mobile plant for the purpose of compaction and where possible materials are stored to facilitate good levels of size reduction  | n/a   |
| <p><b>Black bag policies</b></p> <p>A black bag sort can significantly impact the recycling rate at a site. This can prevent recyclable material from entering the residual waste stream and focus on recycling.</p>                      |              | The four HWRC sites do not operate a public facing black bag sort policy. However, the website asks for waste to be pre-sorted to reduce queues on site.  | A black bag / residual waste interception policy could be introduced at the HWRCs. 39% of the incoming material in 2022/23 (c.10,500 tonnes) was residual waste, contributing to a significant proportion of the service running costs (c£1.1-1.25m pa). A black bag sort policy  |





| HWRC Best Practice  | NNC Baseline | Explanation to Position   | Comments / Recommendations   |
|---|--------------|---|--|
|   |              |   | aims to reduce this, asking residents to sort their black bag waste, ideally prior to accessing the HWRC, or at the site at a sorting area. This aims to reduce the level of residual waste collected, as a volume of this will actually be recyclable, but it will also reiterate to residents the purpose of the site for recycling. |
| <b>Cross border control</b><br>A well monitored cross border policy prevents additional disposal fees, discourages border traffic from out of the council area and reduces site congestion, resulting in reduced queuing times for residents. |              | The Council currently does not have a cross border policy in place.<br>The Council currently has a camera and ANPR system in place across the HWRC network. | Introducing a permit system and/or booking system to control cross border usage, with the ANPR system could help to reduce operating costs.<br>The use of electronic systems removes the need to check proof of residency manually.  |
| <b>Vehicle access policies</b><br>A policy to control vehicle access enables restrictions to be placed on the types of vehicles which can enter the HWRC and helps to prevent Trade waste from entering the HWRC.                             |              | The Council currently has a vehicle access policy in place using a permit system.   | A permit system for vans and trailers is seen as HWRC best practice.<br>However, Trade waste could still slip through using this process and so spot checks from staff are still required.   |

## 4.2 Site Specific Assessment

A range of qualitative assessments have been conducted for each HWRC following feedback from the site visits. Each of the assessment categories has been compared to notional best practice from across SLR's experience and best practice examples from the sector. These are 'point in time' judgements using the same RAG (red, amber, green) scale applied to the full service review above, to indicate fit with best practice standards.

The following assessment guidance (Table 4.3) was used to provide a best practice judgement for each HWRC.



**Table 4.3 Best Practice Assessment Guidance**

| Category                | HWRC Best Practice Judgement  |
|-------------------------|---|
| Entrance                | Access to an HWRC should be well designed to facilitate good two way traffic flow and obvious directional routes. Eliminating or reducing the need for traffic to queue onto the public highway.                                    |
| Layout / design         | A split-level can help sites with higher throughputs to manage materials more efficiently, making it easier for the focus to be on recycling, through easier access to recycling containers and more efficient container servicing. |
| Communication materials | Signage that is easily readable and readily understood encourages site users to recycle with confidence and can help reduce contamination into the residual waste stream.   |
| Opportunities for reuse | A well-run and prominent re-use system on site raises public awareness, which helps to reinforce the impression that the site's primary focus is recovery of materials, whether for re-use or recycling.                            |
| Capacity                | The ability to manage surges in material volumes and sustain reasonable time periods without the need for container servicing.  |
| Flexibility             | The ability to reconfigure or add additional storage capacity at an HWRC to facilitate additional separation of materials for reuse, repair, recycling etc.   |
| Condition               | The built environment is in good condition maintained to modern standards and produces a clean and safe environment for site users and operators.   |
| Trade waste             | Provides the ability for Trade waste to be accepted efficiently without disruption to members of the public. Effective duty of care, charging and payment systems are in place to administer Trade customers.                       |
| Staffing                | The presence of more site staff can increase opportunities to direct site users and help them to increase their recycling efforts, e.g., through a 'meet and greet' service.  |
| Operations              | Operations are well managed, and the facility operates with no or limited disruption to core operational activities whilst still receiving household waste deliveries.  |

#### 4.2.1 Corby

**Table 4.4 Individual Site Best Practice Assessment – Corby**

| Category                | Comment  | Rating |
|-------------------------|--|--------|
| Entrance                | Traffic queues onto main road                                    |        |
| Layout / design         | Constricted layout with bottle necks                             |        |
| Communication materials | Obscured by site design  |        |
| Opportunities for reuse | Present but restricted effectiveness due to wider site pressures |        |



| Category    | Comment  | Rating |
|-------------|--|--------|
| Capacity    | Limited capacity for garden waste and expansion for future materials | Red    |
| Flexibility | Constrained footprint and layout limit options to adapt              | Red    |
| Condition   | Surface breakup and poor container condition                         | Red    |
| Trade waste | Limited scope for effective Trade waste management                   | Red    |
| Staffing    | Understaffed for traffic pressures                                   | Red    |
| Operations  | Effective within the site context and constraints                    | Yellow |

### 4.2.2 Kettering

**Table 4.5 Individual Site Best Practice Assessment - Kettering**

| Category                | Comment  | Rating     |
|-------------------------|--|------------|
| Entrance                | Traffic queues possible into surrounding industrial estate – limited stacking based on entire footprint    | Yellow/Red |
| Layout / design         | Split level but some remote material locations   | Yellow     |
| Communication materials | Good clean and visible signage   | Green      |
| Opportunities for reuse | Limited promotion of reuse opportunities   | Yellow     |
| Capacity                | Good capacity with the ability to manage large volumes of material   | Yellow     |
| Flexibility             | Ability to exploit unused space to future proof against increasing demands                                 | Green      |
| Condition               | Site in good condition   | Green      |
| Trade Waste             | Weighbridge, dedicated office and traffic lane for Trade waste. Potential to interfere with public traffic | Yellow     |
| Staffing                | Considered adequate for current needs  | Yellow     |
| Operations              | Effective within site context and constraints  | Yellow     |

### 4.2.3 Rushden

**Table 4.6 Individual Site Best Practice Assessment - Rushden**

| Category                | Comment  | Rating |
|-------------------------|--|--------|
| Entrance                | Some concerns with short link to main road                                   | Yellow |
| Layout / design         | Good ability for traffic stacking on site – circulation loop and split level | Green  |
| Communication materials | Good visible signage   | Green  |



| Category                | Comment  | Rating |
|-------------------------|--|--------|
| Opportunities for reuse | Limited promotion of reuse opportunities   | Yellow |
| Capacity                | Good capacity with multiple containers for some materials                              | Yellow |
| Flexibility             | Ability to reconfigure container locations and signage                                 | Green  |
| Condition               | Site is good condition   | Yellow |
| Trade waste             | Ability to weigh and manage Trade waste in isolation                                   | Green  |
| Staffing                | Large site to manage and effectively monitor all areas with existing staffing resource | Yellow |
| Operations              | Well managed   | Green  |

#### 4.2.4 Wellingborough

**Table 4.7 Individual Site Best Practice Assessment - Wellingborough**

| Category                | Comment  | Rating |
|-------------------------|--|--------|
| Entrance                | Limited stacking capacity within site, interface with surrounding business entrances                           | Red    |
| Layout/Design           | Ramp access to containers via a long walk/ carry from parking spaces. Large amounts of car reversing witnessed | Yellow |
| Communication Materials | Clear and visible signage  | Yellow |
| Opportunities for Reuse | Active reuse interception but located on the exit route  | Yellow |
| Capacity                | Limited capacity for local demand  | Red    |
| Flexibility             | Restricted within small public area  | Red    |
| Condition               | Site in reasonable condition   | Yellow |
| Trade Waste             | Limited or no ability to manage and accept Trade waste separately  | Red    |
| Staffing                | Challenging environment to monitor public activity   | Yellow |
| Operations              | Effective within site context and constraints  | Yellow |



## 5.0 Infrastructure Review

Forecast housing growth data provided by the Council indicates a significant increase in housing numbers and consequential service pressures over the next envisaged service period. Waste flow modelling detailed in Section 7.3 suggests a potential increase in tonnage demand on the HWRC service of c.26%, which will put pressure on the existing HWRC provision and layout configurations. This is likely to be felt most at HWRCs least capable to stack traffic and service user visits expediently. In view of the anticipated demands of the service, a high-level review of the built infrastructure has been conducted with a view to identifying and indicatively costing<sup>13</sup> potential facility improvements, which are aimed at building site capacity and improving traffic stacking and flow in the short to medium term. A notional cost has also been provided for the development of a new HWRC to help provide a comparison and scale to the site specific suggestions.

### 5.1 Corby

The Corby HWRC is a leased facility which is close to expiry. The site and surroundings hold the potential to provide future development solutions for the HWRC. Its current footprint is constrained which reduces the site's ability to stack traffic and facilitate an expedient flow of traffic through the site.

Should the Council consider the location of the Corby HWRC to be fit for the longer term (with agreeable lease terms) an expansion of the existing site area could be investigated.

Information from the site visit indicates that an area of land immediately outside of the existing HWRC boundary could be suitable for site expansion. Investigation would be required to ensure the proximity to the neighbouring closed landfill site and associated infrastructure do not constrain any expansion. Should these possible constraints be satisfied a range of ground works and surfacing activity could be completed to expand the access, traffic stacking and container arrangement at the facility.

The images below were taken around the perimeter of the existing site, detailing historic infrastructure and engineering which may reduce the burden of development cost. Expansion of the northern and eastern site border could double the site footprint and allow the design and construction of a more 'fit for purpose' facility to serve Corby.

Careful liaison and terms would need to be considered with the landowner, which would need to be balanced against the Council's preference for infrastructure ownership longer term.

---

<sup>13</sup> The indicative costs based on SPONS Price Database and SLR's knowledge of similar facilities. The figures presented are for guidance only and can vary depending on the current market conditions, inflation, efficient working, the scale of the project, site difficulties, location, and tender climate, etc.





**Table 5.1 Potential Indicative Costs - Corby**

| Measure  | Indicative Cost | Comments  |
|--|-----------------|---|
| Expand site footprint resurface existing site and reorganise traffic flows and container locations | £1,548,250      | Partial redevelopment without full redesign and surfacing |
| Total site redevelopment – with expansion into surrounding area                                    | £3,298,000      | Redevelopment of an expanded site into a split level site |
| Replace all site signage   | £5,000-10,000   | Poles and boards - WRAP signage                           |

**Figure 5.1 Area Surrounding Existing Corby HWRC**



**Figure 5.2 Redundant Area / Possible New Access Surrounding Existing Corby HWRC**



## **5.2 Kettering**

The Kettering HWRC represents a well-designed facility, with many aspects that represent best practice for modern recycling centres. However, site visits flagged several underused areas which could be repurposed or developed to improve services in the future.

### **5.2.1 Existing Container Bay Expansion**

The need to provide increased capacity at HWRCs can be aided by increasing the ability to provide safe access to bulk containers. The existing row of containers which represent the main material drop off area at the site could be extended at its western extent to accommodate a further two RORO containers and elevated access walkway. This would provide the ability to offer additional parking space and material storage capacity.

Recent regulatory changes in relation to Waste Upholstered Domestic Seating (WUDs) have illustrated the need to provide additional separate storage, and an enhancement such as this within the existing site footprint could aid the capability of the facility by providing future proofing capability. Any works would need to consider the interaction with the existing split-level ramp and associated ground and surface conditions.

### **5.2.2 Repurposing the Education Facility**

An unused, two storey modular building at the HWRC potentially represents a facility which could be repurposed for a range of activities relating to the service.

Some UK councils have developed a range of solutions for providing repair and reuse initiatives at, or in close proximity to, HWRCs. These often require undercover storage,





presentation and workshop space. Although the internal suitability of the buildings was not observed and would need to be assessed should this represent a viable option to the Council, the location and space in this area of the site hold potential for development. An indicative cost for the redevelopment of the existing building has been provided below.

### 5.2.3 Redesigning the Lower Service Area

The existing entrance and traffic flow takes a clockwise route around the site. The western extent of this route is at a lower level and uses two lanes to separate household waste and trade waste traffic. The trade waste capability is supported by a small weighbridge office located in the lower operational area. This area also contains an array of bring bank style collection containers for glass, clothing, and other items.

The operational yard immediately adjacent to this section of site appears to be underused and only occasionally used for the servicing of the bring bank containers. The area could be repurposed to provide improved internal traffic stacking capability, noting the issues with traffic occasionally overwhelming the facility to the point of temporary closure.

Additionally, should the Council wish to enhance its Trade waste offering, a dedicated trade waste area could be developed in this section of the site. This would likely involve demarcating a small, dedicated internal circulation loop for commercial vehicles and possible relocation of the existing weighbridge to ensure disruption to household waste traffic is minimised. An indicative cost for this work would be c.£132,500.

**Table 5.2 Potential Indicative Costs - Kettering**

| Measure   | Indicative Cost | Comments  |
|---|-----------------|---|
| Repurpose existing 'green building' for reuse and repair hub  | £20,000         | Repainting, modifications to walls, etc.                              |
| Extend container bay and walkway / split level area to accommodate more containers in the row   | £50,000         | Some walls, fill and surfacing  |
| Develop increased traffic stacking capability within the existing footprint SW corner – resurfacing / lines etc   | £7,500          | Line marking and some fencing / barriers                              |
| Develop a dedicated trade waste drop off area in the currently underutilised area in front of the entrance - relocation of weighbridge / construction of block bays | £55,000         | Walls, Legio blocks and road markings plus relocating the weighbridge |

## 5.3 Rushden

The existing Rushden facility receives the greatest number of visits and tonnage of the NNC HWRC network. Its ability to stack traffic off the connecting highway and service visits efficiently make this a user-friendly facility. This ease of use, coupled with forecast increasing demand and a neighbouring facility which requires ramp access, suggest the future pressure on the facility could be significant.

To provide additional bulk containers and access capability, the existing row of container bays could be extended. Detailed services and structural inspection would be required, but an area to the eastern extent (currently a grass bank) of the existing row could be developed to accommodate more containers and would help future proof the HWRC for further demands to separate additional materials.





The visual screening / vegetation surrounding the site could also be considered for reduction where permissible, to provide additional land area for complementary repair and reuse buildings / structures.

**Table 5.3 Potential Indicative Costs - Rushden**

| Measure   | Indicative Cost | Comments   |
|---|-----------------|--|
| Expansion into highlighted grass area to extend the number of containers in the split level | £100,000        | Dependant on ground conditions and disruption of utilities etc |
| Slip road redesign to allow better queuing off the highway                                  | £50,000         | Improvement to gate area to increase visibility and turning    |
| Small reuse and repair building   | £150,000        |  |

## 5.4 Wellingborough

Similar to the Corby HWRC, Wellingborough operates within a constrained footprint with the use of access ramps to the main bulk containers. These features represent access and accessibility issues put pressure on these sites currently and will continue to do so in the future as the demand for their services increases.

Owing to the existing constrained footprint, whereby containers and traffic are tightly packed into a small area, expansion of the facility where feasible could be investigated. The area immediately north and northeast of the site is currently not developed and could represent an opportunity to expand the existing site footprint. This would allow the construction of a split-level facility, to better manage traffic and improve access to bulk containers for site users.

Information requested as part of this commission has not established the definitive ownership and tenure of the surrounding land. This would need to be investigated further by the Council to determine feasibility.

**Table 5.4 Potential Indicative Costs - Wellingborough**

| Measure   | Indicative Costs | Comments  |
|---|------------------|---|
| Extend site footprint surrounding area - ground works, surfacing, line painting.  | £1,819,000       | Redevelopment of an expanded flat site                    |
| In conjunction with the above build a split-level facility to remove the need for ramp access   | £3,220,000       | Redevelopment of an expanded site into a split-level site |
| Re organise site layout to reduce 'carry distance between cars and bins' and remove the need for extensive car reversing - resurfacing and lining | £10,000          | Mainly road marking and barriers                          |

## 5.5 Longer Term Requirements

Sections 5.1 to 5.4 have explored the potential of adapting existing HWRCs to meet the immediate, short and medium term forecast demands for the service. These enhancements should be considered and incorporated within the Council's capital programmes or other suitable delivery mechanisms to future proof existing infrastructure against the existing pressures and growth forecasts.



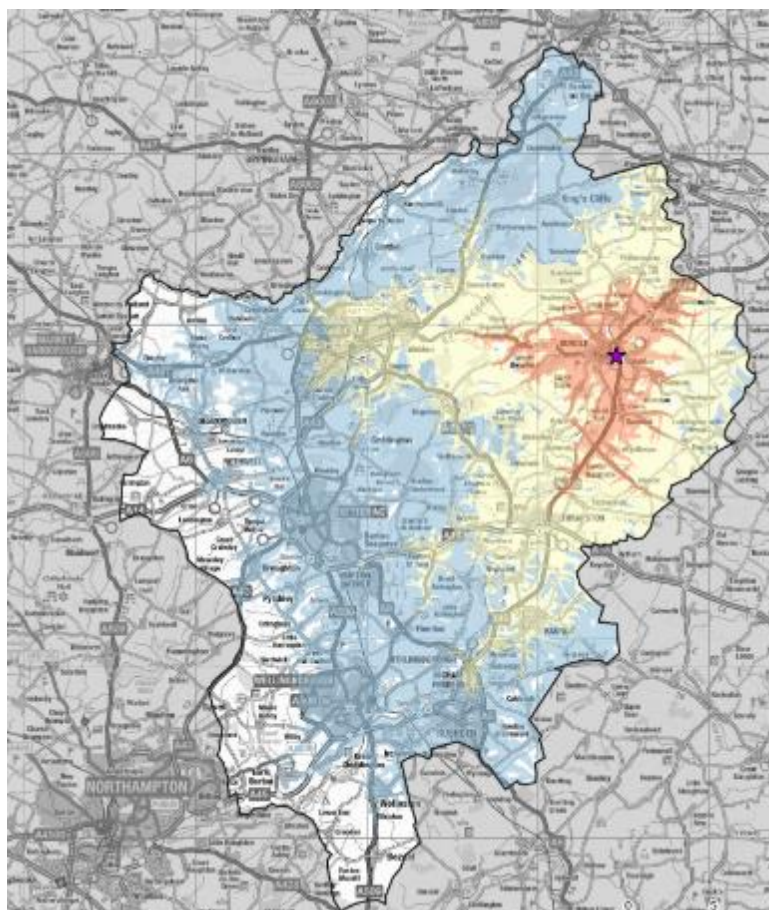
Should the projected population and housing growth be realised, the total capacity of the HWRC network may not be sufficient to accommodate the longer-term tonnage growth forecasts. This would be particularly exacerbated should extensions to the existing facilities at Corby and Wellingborough not be realised in the medium term.

High end arising scenarios discussed in section 1.2 suggest up to a potential 26% increase in HWRC tonnages by 2038. Should these future trajectories become reality, it is highly likely that additional provision and expansion of HWRCs (above those already detailed) would be required to manage the demand.

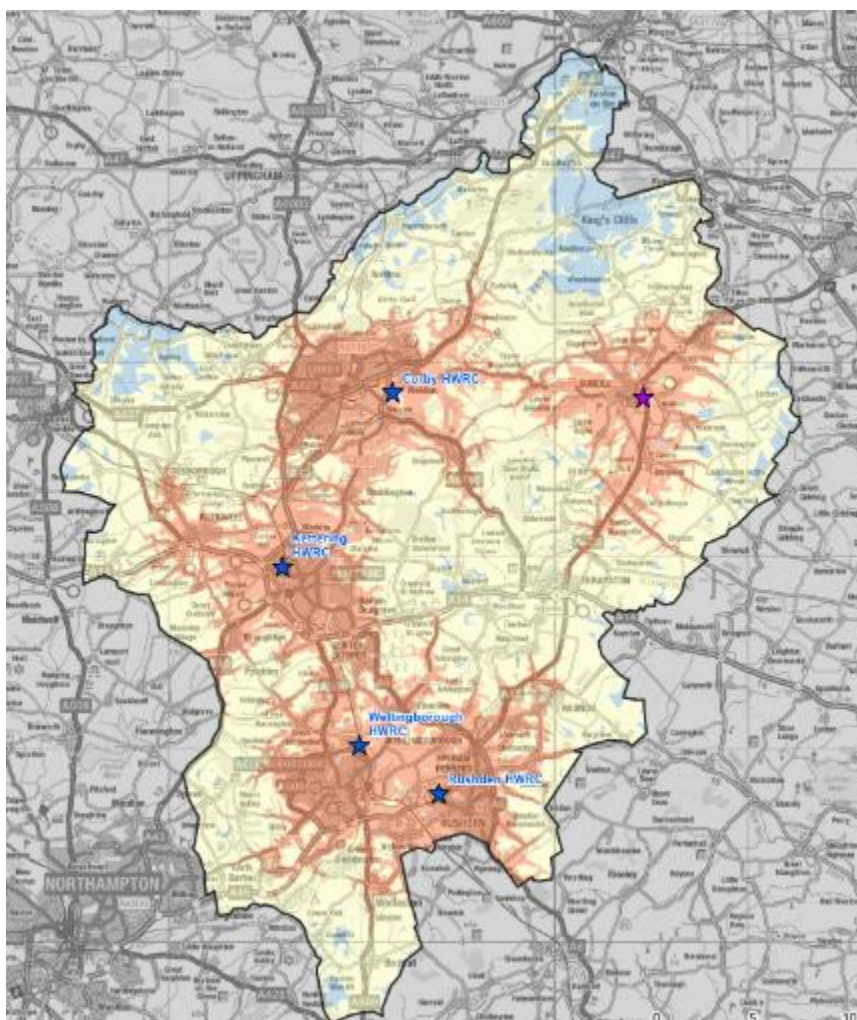
Currently the HWRCs are located in the principal, most populous settlements within the Council area. Drive time analysis indicates that the current distribution provides c.96% of the current population with a drive time of less than 20 minutes to access a HWRC, which suggests that these locations represent good positions for current and potential future HWRCs.

Spatial analysis shows an area of higher drive time toward the northeast of the Council area. Although no large towns are located within this area, the potential of a smaller facility to serve the Council's rural areas could be considered to help reduce demand on the other HWRCs in future. A theoretical location within the Oundle area for instance could provide the following coverage within the area.

**Figure 5.3 Theoretical new HWRC location**



**Figure 5.4 Additional HWRC - theoretical network drive time**



## 5.6 Indicative New HWRC Costs

The development an HWRC is dependent on a wide range of factors which ultimately influence the cost of delivery. Regulation, and resulting amendments to operating requirements in recent years, have increased focus on fire prevention and improved drainage at HWRCs, which have increased development cost.

For comparison with the improvement options suggested for each existing HWRC, SLR has provided a 'default' HWRC construction cost to provide a modern fit for purpose HWRC handling between 7,500 and 10,000 tonnes per annum. These estimates exclude any cost associated with site acquisition, planning or permitting. A breakdown of the forecasts is detailed below in Table 5.5.



**Table 5.5 Budget Estimate - HWRC Construction Cost**

| Item | Description   | Quantity | Unit | Rate                     | Cost                  |
|------|---|----------|------|--------------------------|-----------------------|
|      | <b>General Items</b>  |          |      |                          |                       |
| 1    | Contract Management & Site Supervision, Insurances, traffic management, Health and Safety, Welfare and Health and Safety File | 52       | wks  | £ 12,500.00              | £ 650,000.00          |
| 2    | Construction Testing  | 1        | sum  | £ 10,000.00              | £ 10,000.00           |
| 3    | Service Provision   | 1        | sum  | £ 40,000.00              | £ 40,000.00           |
|      | <b>Civils</b>   |          |      |                          |                       |
| 4    | General Site Clearance  | 1        | sum  | £ 30,000.00              | £ 30,000.00           |
| 5    | Demolition  | 1        | sum  | £ 25,000.00              | £ 25,000.00           |
| 6    | Earthworks including Sub-Base   | 1        | sum  | £ 150,000.00             | £ 150,000.00          |
| 7    | Site Entrance Works   | 1        | sum  | £ 50,000.00              | £ 50,000.00           |
| 8    | Modular Office  | 175      | sqm  | £ 750.00                 | £ 131,250.00          |
| 9    | ReUse Office - Steel Frame Building   | 306      | sqm  | £ 1,170.00               | £ 358,020.00          |
| 10   | Earthworks  | 1        | sum  | £ 75,000.00              | £ 75,000.00           |
| 11   | Concrete Hardstanding   | 3500     | sqm  | £ 70.00                  | £ 245,000.00          |
| 12   | Asphalt Areas   | 1500     | sqm  | £ 60.00                  | £ 90,000.00           |
| 13   | 3m high retaining wall bays   | 250      | m    | £ 700.00                 | £ 175,000.00          |
| 14   | Canopy  | 300      | m    | £ 275.00                 | £ 82,500.00           |
| 15   | Weighbridges  | 1        | No.  | £ 45,000.00              | £ 45,000.00           |
| 16   | Drainage and Controls   | 1        | sum  | £ 150,000.00             | £ 125,000.00          |
| 17   | Firewater Tank  | 1        | sum  | £ 100,000.00             | £ 100,000.00          |
| 18   | Road markings, Bollards, Barriers, Lighting, etc  | 1        | sum  | £ 50,000.00              | £ 50,000.00           |
| 19   | Fencing   | 315      | m    | £ 150.00                 | £ 47,250.00           |
| 20   | Landscaping   | 1        | sum  | £ 25,000.00              | £ 25,000.00           |
| 21   | Meet and Greet Shelter  | 1        | sum  | £ 4,000.00               | £ 4,000.00            |
| 22   | Signage   | 1        | sum  | £ 5,000.00               | £ 5,000.00            |
|      | <b>Mechanical and Electrical</b>  |          |      |                          |                       |
| 23   | CCTV, Solar Panels, Traffic Control, Cabling, Fire Detection, external Lighting, etc  | 1        | sum  | £ 200,000.00             | £ 200,000.00          |
|      | <b>Operational Costs</b>  |          |      |                          |                       |
| 24   | Containers  | 10       | No.  | £ 7,000.00               | £ 70,000.00           |
| 25   | Containers Spare  | 4        | No.  | £ 7,000.00               | £ 28,000.00           |
| 26   | Containers, Other plus Cage, Tanks, etc   | 1        | sum  | £ 10,000.00              | £ 10,000.00           |
| 27   | Computer Equipment, Printer, etc  | 1        | sum  | £ 2,500.00               | £ 2,500.00            |
| 28   | Mobile Plant  | 1        | sum  | £ 150,000.00             | £ 150,000.00          |
|      |   |          |      | <b>Total</b>             | <b>£ 2,973,520.00</b> |
|      | Contractor Planning/Design Costs (6% of Total of Construction Cost i.e. Total minus Operational))                             |          |      |                          | £ 162,781.20          |
|      | Site Investigation  |          |      |                          | £ 30,000.00           |
|      | Contingencies (10% of total)  |          |      |                          | £ 297,352.00          |
|      |   |          |      | <b>Total Budget Cost</b> | <b>£ 3,463,653.20</b> |





## 6.0 Future Service Policy Considerations

A review of existing service policy has been conducted in section 2.2. The following section explores potential additions to the suite of policies which the Council could consider as it designs and implements a new period of service delivery.

### 6.1 Cross Border Policies

A cross border policy to prevent non NNC residents using the HWRCs would seek to limit additional disposal fees, discourage border traffic from outside of the Council area and reduce site congestion, resulting in smaller queuing times for residents. In addition, this is a complementary step to further reduce Trade waste abuse from businesses.

This could be implemented in conjunction with a booking system or existing e-permit system, where residents must provide proof of residency to access the HWRCs. Table 6.1 below highlights the cross border policies in place at the Council's neighbouring authorities and suggests that NNC is potentially an anomaly within the region in lacking a defined policy or statement relating to cross border usage.

**Table 6.1 Neighbouring Authority Cross Border Policies**

| Council               | Cross Border Policy / Approach  |
|-----------------------|---|
| NNC                   | No policy   |
| Rutland               | e-permit scheme where residents are asked to register with proof of residency to area                       |
| Harborough            | No current mention of policy on website   |
| West Northamptonshire | No current mention of policy on website – Currently a similar position to NNC as the same contract in place |
| Milton Keynes         | Booking system in place, where proof of address is required   |
| Bedford               | Proof of address required   |
| Huntingdonshire       | Mentions the sites are for residents, but does not mention needing to provide proof of address              |
| City of Peterborough  | No current mention of policy on website   |
| South Kesteven        | Mentions the sites are for residents, but does not mention needing to provide proof of address              |

### 6.2 Booking Systems

NNC does not operate a HWRC booking system at any of its four sites. There are a number of advantages to a booking system and reasons why this policy could be considered across all HWRCs within NNC, including to manage traffic accessing the sites, which can often cause disruption to important local roads and surrounding businesses.

Booking systems grew in popularity during the COVID 19 Pandemic and a number of councils have retained the use of such systems and report the broad benefits that these systems can provide, including:

- Hampshire County Council reports the following: "It allows site staff to plan operational activities with confidence, while the public can book a slot at their nearest site at a



convenient time, safe in the knowledge that they will be able to attend the site efficiently and not wait in a queue to get in”<sup>14</sup>; and

- Kent County Council (KCC) following the introduction of a booking system has seen significant annual savings, due to the reduction in queues, improved communications and freed up staff. Additionally, KCC has seen a 42% increase in positive sentiments post-implementation, with a 10% increase in recycling rates. This is because staff have more time to help citizens rather than managing traffic due to the new controlled demand, resulting in less contamination.

Booking systems are often favoured by contracted providers, owing to the extension of control and certainty that they bring to operational activity.

A booking system may be of particular interest to NNC to manage traffic congestion. Currently, when the HWRCs are experiencing a high number of visitors, the sites will temporarily close to disperse traffic queuing on the road. A booking system could help to prevent the need for temporary closure.

Of NNC’s eight neighbouring authorities, only Milton Keynes currently has a booking system in place. The system was introduced to its three HWRC sites during the pandemic and the council has continued using the service after seeing savings of approximately £200,000 in a 12-month period<sup>15</sup>, due to the throughput in tonnage dropping across the HWRC network and a comparative increase has not been seen at the kerbside.

NNC and the other seven neighbouring authorities use a permit system instead, which is discussed in Section 2.2.2. A summary of the general advantages and disadvantages of using booking systems is detailed below.

**Table 6.2 HWRC Booking Systems- Advantages and Disadvantages**

| Advantages   | Disadvantages  |
|--|--|
| <ul style="list-style-type: none"> <li>• Easier access and less disruption for neighbouring businesses and other road users</li> <li>• Reduced idling of cars waiting in queues to access HWRCs – contributing to improved local air quality</li> <li>• More efficient visits improving the customer experience of an HWRC visit</li> <li>• Potential to broaden the NNC communications reach via the booking system web pages and associated email confirmations</li> <li>• More accurate identification of residents – reducing loopholes for abuse from users from outside of the NNC area</li> <li>• Should any form of payments be implemented across the service transaction, these can be made in advance to remove the need for payments at HWRCs</li> </ul> | <ul style="list-style-type: none"> <li>• Reduction in resident choice – no longer can resident choose when to visit an HWRC</li> <li>• Possibility of technical issues - if technical issues are experienced and not resolved quickly this could result in poor customer service</li> <li>• Retention of personal data – compliant personal data would need to be held in order to administer the booking system</li> <li>• Requirement for online bookings – the most efficient means of administering the system is via electronic means which is not accessible to all residents</li> <li>• Perception of fly-tipping – concerns relating to increased levels of fly tipping</li> </ul> |

<sup>14</sup> [https://democracy.hants.gov.uk/documents/s90072/Decision\\_Day\\_Report.pdf](https://democracy.hants.gov.uk/documents/s90072/Decision_Day_Report.pdf)

<sup>15</sup> <https://www.letsrecycle.com/news/milton-keynes-saves-200000-with-hwrc-booking-system/>



| Advantages  | Disadvantages |
|---|---------------|
| <ul style="list-style-type: none"> <li>• Identification of frequent users – data from the booking system can be used to monitor and communicate with high frequency users to ensure HWRCs are not being abused</li> <li>• Scheduled maintenance – where HWRCs need to experience closures for works to take place booking systems can be modified accordingly to limit access and prevent any disruption to customers</li> <li>• Longer term data can be used to advise service planning and operational activity to provide efficient servicing and reduced disruption to residents</li> </ul> |               |

The government has recently (18<sup>th</sup> June 2023) announced a ban for DIY waste charges at HWRCs in order to combat fly-tipping. The updated legislation clearly defines DIY waste and sets specific conditions for it to be treated as household waste. The parameters include the scale of construction, whether the activities generate income, the frequency of HWRC visits and the quantity of waste produced per visit<sup>16</sup>.

The use of a booking system could be used to deal with the new legislation, as a council can track the number of times a particular resident is visiting a site. Using this information, staff can be made aware of particular vehicles to which closer attention needs to be paid to understand whether there is any trade waste abuse, in the form of DIY waste.

### 6.3 Commercial Waste Opportunities

The current use of this service appears limited. Two of the HWRCs are well equipped to separately measure trade waste with dedicated traffic lanes and weighbridges. Should NNC wish to enhance its customer base, a range of communication and awareness activity could be implemented to target new customers.

This could include on site signage or adverts in local trade publications or social media platforms. Understanding and profiling the existing customer base may also help identify opportunities to target particular business types which align well with the offering provided by the HWRC facilities.

The Kettering HWRC represents a facility which could be adapted to provide an improved commercial / trade waste offering. Further details regarding these considerations are discussed in section 5.2.3.

### 6.4 Black Bag Inspections and Splitting

Increasing in popularity over recent years, councils are asking their residents to separate their waste before arriving at the site and are otherwise asked to sort on site, at a sorting area, or risk being refused entry to the site. The policy has the potential to boost recycling rates achieved at individual sites and significantly reduce disposal costs incurred by the Council.

Interception and sorting areas provide the opportunity for recyclable items to be captured and diverted to other containers and away from the residual waste bins.

<sup>16</sup> <https://resource.co/article/government-scraps-diy-waste-charges>



However, such an approach will require approximately one additional FTW/ dedicated per HWRC and broad management hierarchy support, including political backing to be successful. This form of policy during inception is likely to prove unpopular with some site users but, if sustained, has the potential to influence the behaviour of all site users and change the perception of the HWRCs.

**Figure 6.1 Sorting Table Example - Bristol Waste**



### Case Study

In 2019, the Vale of Glamorgan in Wales in 2019 introduced a policy which ended the acceptance of any unsorted bags and introduced the splitting of black bags across its HWRCs.

The change produced an increase of c.10% in the HWRC recycling rate and reduced residual waste by c.60% in the first five months, including a 15% increase at a single HWRC from 69% to 84% and an associated residual waste cost saving of c.£25,000 per month.

Communication with residents asked them to sort their materials before arriving at the HWRCs so that they could achieve a swift turnaround. A deadline was also published for all bagged waste. Beyond this date, all bagged waste would need to be sorted at the HWRC by the residents. Dedicated sorting areas were installed across the network, alongside reconfigured access to residual waste containers, making it more intuitive and easier to recycle items before considering disposing of them.

## 6.5 Novel Materials

The Council already provides a broad range of different material streams which are collected and sorted at the HWRCs. This compares well with UK wide opportunities and therefore the addition of new items is likely to have a lower overall impact on recycling rates in comparison to other options.

Other novel material streams which could be made available at the sites may include unwanted medical equipment. Lincoln City Council introduced a successful pilot survey to their HWRCs, which saw collection of unwanted medical equipment suitable for reuse and recycling, allowing for perfectly good medical equipment that was cluttering living rooms (or ending up in domestic waste) to be reused or recycled. By working together, the council and residents were able to help those patients who need it most, reduce the NHS carbon footprint and work more cost effectively.





As a further example, Newport County Council has partnered with Terracycle to accept and recycle all brands of crisps packets at their sites, a material notoriously hard to recycle<sup>17</sup>.

Additionally, Northumberland County Council has developed one of the first HWRCs to offer a vape tube for recycling. The devices contain lithium batteries which can be highly flammable and should never be disposed of in general waste. Councillor John Riddle, cabinet member for local services, said: "We have a contract with a local company who can break down the vapes into their component parts and recycle the batteries and metal parts." The Council hopes the bin will help tackle the disposal of one of the fastest-growing waste streams in the country<sup>18</sup>.

---

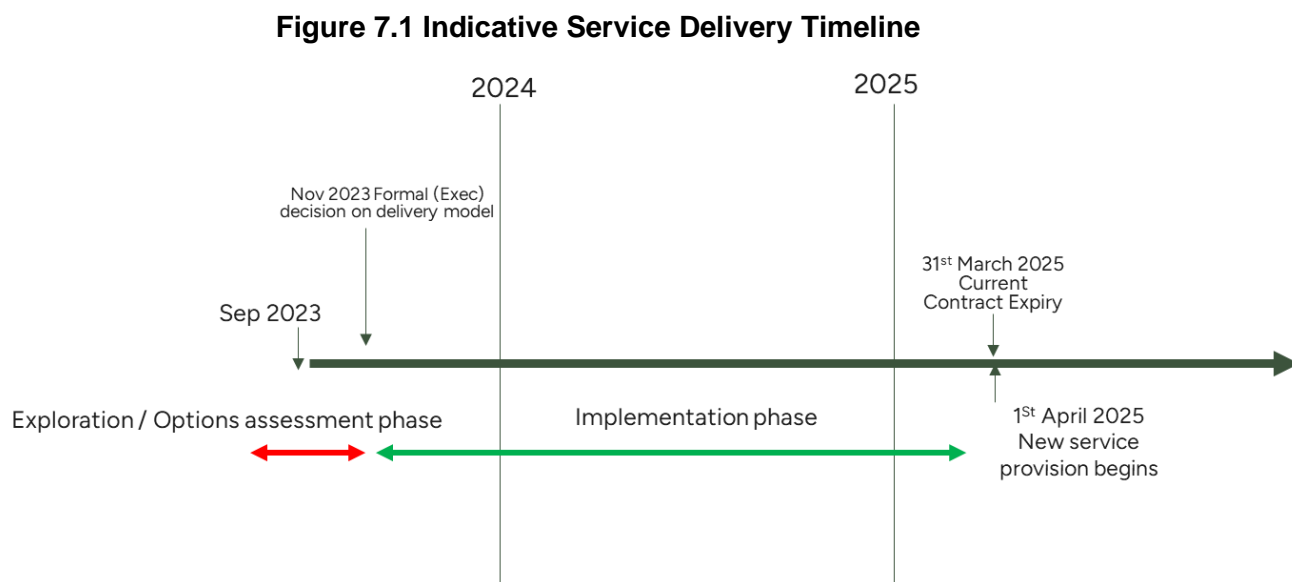
<sup>17</sup> <https://www.terracycle.com/en-GB/brigades/kpsnacks#@54.39586446195522:-2.83447377734376zoom:5>

<sup>18</sup> <https://www.hexham-courant.co.uk/news/23540560.northumberland-county-council-offer-vape-tube-recycling-bins/>



## 7.0 Future Service Delivery Assessment

The Council is within two years of its existing contracted provision expiring and needs to plan for the next phase of service delivery. Figure 7.1 illustrates an indicative timeline for the delivery of the new service arrangements.



As part of this commission, SLR has provided a high-level assessment of two headline service delivery options for the next service phase as follows:

- **A contracted out service** – whereby the delivery of HWRC services continues in a similar form to the existing provision, with limited changes to the existing ‘client side’ Council officer structure. The operations, transportation and material marketing remain the responsibility of the contracted service provider.
- **A fully inhouse service** – this option sees the full responsibility for operating and managing the HWRC service brought within the Council’s remit of systems and processes. It would involve the TUPE of all in scope existing contracted staff to the Council, with responsibilities for material marketing, technical compliance, transportation, and health and safety needing to be provisioned within Council staffing structures.

It is acknowledged that variants to each of the headline options exist and are in operation within the UK. For example, the establishment of arm’s length Council companies or subdivisions of contracted services, whereby site operations are delivered inhouse and transportation and material marketing are delivered under contract. However, for the purpose of this high-level assessment this disaggregation of component services has not been considered.

### 7.1 Future Service Delivery Options - Qualitative Assessment

The following assessment compares, at a high-level, respective qualitative benefits and drawbacks or risks of inhouse, or outsourced service provision under the following themes;

- Service Delivery
- Revenue Generation & Retention



- Staffing
- Service Delivery Costs
- Customer Satisfaction
- Flexibility
- Service Management
- Risk Management (Financial/other)
- Governance
- Upfront Costs
- Maximising Recycling Performance

A summary of the detailed assessment under each theme is provided below, followed by the detailed comparison under each theme.

**Table 7.1 Summary of Service Delivery Qualitative Assessment**

| Theme                          | In-house   | Outsourced   |
|--------------------------------|--|--|
| Service Delivery               | <ul style="list-style-type: none"> <li>• Perception of potential saving as contractor profit margin does not need to be accounted for</li> <li>• Council needs to clearly define the scope of the future service (e.g., include or exclude haulage services)</li> <li>• Limited certainty over future service delivery costs</li> <li>• Potentially limited access to supply chains and economy of scale to support equipment purchase and agreeing terms with offtakers of materials</li> </ul> | <ul style="list-style-type: none"> <li>• Service delivery costs well understood during the bidding stage, but will include a profit margin</li> <li>• Mechanisms for future cost increases established through procurement process and/or discussion with bidders</li> <li>• Sharing of management resource and overhead costs from support services across contracts can provide a cost benefit to the Council</li> <li>• Well established supply chains and economy of scale may be beneficial in purchase of equipment and agreeing terms with offtakers of recyclable materials</li> </ul> |
| Revenue Generation & Retention | <ul style="list-style-type: none"> <li>• Full potential to benefit from all revenue generating aspects of the service</li> <li>• Full exposure to associated market risks</li> <li>• Some limitations possible in securing competitive rates for materials</li> </ul>  | <ul style="list-style-type: none"> <li>• Re-procurement would provide an opportunity for the Council to review its attitude to risk regarding revenue generation and retention and structure a new contract accordingly</li> <li>• Outsourcing likely to realise higher rates per tonne for recyclables</li> </ul>   |
| Staffing                       | <ul style="list-style-type: none"> <li>• Key risk is the identification and appointment of suitably</li> </ul>   | <ul style="list-style-type: none"> <li>• No particular issues for the Council to address</li> </ul>  |



| Theme                                    | In-house   | Outsourced  |
|--|--|---|
|  | <p>skilled and experienced management and supervisory staff to oversee and deliver the service</p> <ul style="list-style-type: none"> <li>• Delivery of associated support services also needs to be factored in</li> <li>• Transferred staff would need to be aligned with Council terms and conditions of employment</li> <li>• Ongoing staff management requiring rapid response could be impacted by Council procedures</li> <li>• Transparency of staff costs required to facilitate TUPE transfer</li> </ul> | <ul style="list-style-type: none"> <li>• Contractor to demonstrate adequacy of staffing at bid stage</li> <li>• Access to wider pool of staff provides contingency</li> <li>• Transparency of staff costs required to facilitate TUPE transfer</li> </ul>   |
| Customer Satisfaction                    | <ul style="list-style-type: none"> <li>• Transition to a new delivery model could impact on delivery of services, particularly in the early stages</li> <li>• Reduced ability to incentivise staff behaviour in this context</li> </ul>  | <ul style="list-style-type: none"> <li>• Required standards written into a contract</li> <li>• The Council also has the opportunity to distance itself from the Contractor in the event of service failures, to better manage reputational risk.</li> </ul> |
| Flexibility to Introduce Service Changes | <ul style="list-style-type: none"> <li>• Greatest flexibility to introduce changes as and when deemed necessary, in-line with internal governance procedure</li> <li>• Lack of ongoing wider market experience could see services stagnate over time</li> </ul>  | <ul style="list-style-type: none"> <li>• Potential future service changes could be costed out as provisional items</li> <li>• Service changes subject to negotiation and potential cost variations</li> </ul>   |
| Service Management                       | <ul style="list-style-type: none"> <li>• High potential level of flexibility, but subject to adherence to Council procedures</li> <li>• Need to ensure that the management and supervisory structure and appointed individuals are fit for purpose</li> <li>• Risk of service management methods remaining static</li> </ul>   | <ul style="list-style-type: none"> <li>• Management requirements written into a contract</li> <li>• Wider operational experience may provide ongoing improvement and innovation benefits</li> </ul>   |
| Risk management (Financial)              | <ul style="list-style-type: none"> <li>• 100% Council exposure to all financial risks</li> </ul>   | <ul style="list-style-type: none"> <li>• Greater certainty of service delivery costs</li> <li>• A new procurement would allow the Council to fully</li> </ul>   |



| Theme                   | In-house  | Outsourced   |
|-------------------------|---|--|
|                         | <ul style="list-style-type: none"> <li>Limited certainty over future service delivery costs</li> </ul>  | revisit its preferred risk positions and establish a contract which reflects that position   |
| Risk Management (Other) | <ul style="list-style-type: none"> <li>100% Council retention of other risks</li> <li>Access to service contingency arrangements may be restricted</li> <li>High reputational risk potential for the Council</li> </ul>   | <ul style="list-style-type: none"> <li>A new procurement would allow the Council to fully revisit its preferred risk positions and establish a contract which reflects that position</li> </ul>  |
| Governance              | <ul style="list-style-type: none"> <li>More complex governance arrangements, potentially subject to political interference</li> <li>Most effective means of reflecting Council culture</li> </ul>   | <ul style="list-style-type: none"> <li>Proven mechanisms in place</li> </ul>   |
| Upfront Costs           | <ul style="list-style-type: none"> <li>Significant upfront costs and resource required in transferring staff, replacing, or refurbishing plant and equipment, rebranding the service and delivering a contract management team and all associated support services and systems</li> </ul>   | <ul style="list-style-type: none"> <li>Potentially significant upfront costs including for procurement, contract mobilisation, replacement or refurbishment of plant and equipment, and rebranding of the service.</li> </ul>  |
| Maximising performance  | <ul style="list-style-type: none"> <li>Flexibility to introduce changes at pace, in-line with internal governance procedure, may allow opportunities for enhanced performance to be realised more quickly</li> <li>Changes to infrastructure initiated by the Council will not attract compensation/ disruption issues</li> <li>Limited consequence or recourse for poor performance</li> </ul> | <ul style="list-style-type: none"> <li>Ability to form/ specify and implement performance mechanisms that reward increased performance and penalise below target performance</li> <li>Transparency of performance information</li> <li>Changes in wider waste services impacting arising and performance potential</li> <li>Any changes to built infrastructure may attract compensation or disruption payments to a contractor</li> </ul> |

It is recommended that further detailed cost modelling on each of the options should be conducted at a point in time where more detailed outsourced cost information becomes available.

### 7.1.1 Service Delivery

**Table 7.2 Service Delivery Option Assessment**



| Delivery Model | Comments  |
|----------------|---|
| In-house       | <ul style="list-style-type: none"> <li>• There is limited ability to penalise poor performance.</li> <li>• The risk of poor performance remains solely with the Council.</li> <li>• Options to incentivise staff (e.g., performance related bonuses) to deliver improved services are limited within an in-house service delivery models.</li> </ul>  |
| Outsourced     | <ul style="list-style-type: none"> <li>• Implementation of a rigorous but fair and ‘on market’ performance management framework including contract specific KPIs should provide sufficient contractor incentive to maintain its own performance standards.</li> <li>• Well-developed contracts include appropriate termination provisions in the event of persistent poor service delivery, allowing councils to receive compensation including re-procurement costs.</li> <li>• A new procurement would allow the Council to introduce a ‘clean slate’ in terms of requirements and mechanisms for managing future performance.</li> </ul> |

There are performance management risks associated with both of the options, but it should be noted that any outsourced service will have greater flexibility to directly incentivise staff to deliver higher levels of recycling and/or reuse.

### 7.1.2 Revenue Generation and Retention

**Table 7.3 Revenue Generation and Retention**

| Delivery Model | Comments  |
|----------------|---|
| In-house       | <ul style="list-style-type: none"> <li>• In-house service delivery models allow charges to be levied for eligible services to recover full service costs, but it is not legally permitted to make profits.</li> <li>• Under the in-house model, the Council would benefit from any income generated through any on site charging schemes and the sale of recyclable materials, but clearly 100% of the risk associated with fluctuating prices for those materials would then sit with the Council.</li> <li>• In-house options may not be able to attract and sustain competitive materials prices compared to externalised contracts with large, established firms who may have better purchasing power.</li> <li>• In-house options, due to the need to follow procurement procedures and internal policies, may also not be able to switch or amend material off-take arrangements with the same flexibility as could be achieved under externalised contracts, especially when commodity markets fluctuate or are under pressure.</li> </ul> |
| Outsourced     | <ul style="list-style-type: none"> <li>• The potential to receive a share of any income generated from the sale of recyclable materials would need to be explored and defined during the</li> </ul>   |



| Delivery Model | Comments   |
|----------------|--|
|                | <p>procurement process. This is already a feature of the existing contract and well understood within the Council.</p> <ul style="list-style-type: none"> <li>• Under current market conditions, contractors are unlikely to offer highly attractive proposals for income sharing, especially if they are required to manage or share materials price risk and may decline to bid if the Council's position is considered to be incompatible with contractor business aims.</li> <li>• The extent of such sharing of income is likely to be limited compared to the in-house delivery models.</li> <li>• Any sharing of income would partially offset contract costs.</li> </ul> |

As with performance management, the preferred option in the context of revenue generation and management will need to reflect the Council's position on acceptance of risk.

The in-house solution would give the Council greatest control and would remove any profit share arrangements with a contractor but would also mean accepting all of the associated risks (especially material price risks) across the network of sites.

Outsourcing is likely to require a level of compromise in order to attract sufficient interest from the wider market. It may however be able to deliver higher levels of income per tonne of recyclable materials, due to the economies of scale and ability to leverage existing contracts with reprocessors available to potential service providers.

### 7.1.3 Staffing

**Table 7.4 Staffing**

| Delivery Model | Comments   |
|----------------|--|
| In-house       | <ul style="list-style-type: none"> <li>• Current contractor staff would be transferred to the Council.</li> <li>• Potential for senior management staff of the current contractor not to transfer to the Council, therefore the Council would require appropriate recruitment to secure the services of suitably skilled and experienced individuals within required timeframes to ensure smooth transition.</li> <li>• Requirements for administrative and central support functions which could be delivered (or at least partly delivered) by existing Council staff carrying out similar duties (e.g., health and safety, payroll), but may require recruitment of new staff to deal with additional workloads.</li> <li>• Salaries, pensions, and benefits (e.g., holiday entitlements) of the contract management team and staff may need to be aligned with the Council's remuneration and pension scales. This may not deliver efficient staffing costs or effective salary differentials compared to outsourcing.</li> <li>• Staff absence rates are generally higher for in-house service delivery models, which can be challenging to address by relying solely on policies implemented by local authorities compared to outsourced delivery models. Higher staff absence rates can result in higher service delivery costs and/or affect service performance due to lower productivity levels. This leads to a reliance on costly Agency cover requirements</li> </ul> |
| Outsourced     | <ul style="list-style-type: none"> <li>• Current contractor staff subject to TUPE transfer to a new contractor following re-procurement.</li> </ul>  |





| Delivery Model | Comments   |
|----------------|--|
|                | <ul style="list-style-type: none"> <li>Salaries and pensions for non-TUPE'd over staff can be set at prevailing market rates and therefore provides potential for cost savings compared to in-house service delivery.</li> <li>Central support functions are more likely to be delivered remotely (i.e., outside of NNC) and probably with the help of shared resources, delivering potential cost savings for the Council compared to in-house.</li> <li>Usually, outsourced service delivery models have lower staff absence rates as they tend to have greater ability to monitor and implement stricter measures for dealing with staff absence. Also, they usually have immediate access to a pool of competent staff and operatives (e.g., agency arrangements, other contracts) that they can access to address staff shortages.</li> </ul> |

Outsourcing delivers a solution that would not require significant input from the Council.

SLR's engagement with other Councils suggests that those who have been through a transition of HWRC service delivery model, provision of suitable staff and ongoing engagement with staff were raised repeatedly in the context of moving to an in-house service. Key points raised included:

- the need to have experienced managerial / supervisory staff in place to manage the transition and future service (noting that the individuals currently in post with a private contractor may not wish to TUPE across to the Council);
- the amount of Council resource needed during the period prior to the handover of services and then thereafter to ensure continued engagement with site staff to achieve the required cultural change and ensure that Council policies, procedures and systems are embedded throughout the service; and
- the perceived benefits of an outsourced solution in terms of being able to respond quickly to staffing shortages, loss of senior staff etc compared to an in-house model where the procedures which must be followed to initiate such changes are considered to be more onerous and time consuming.

### 7.1.3.1 Envisaged Options Operating Structures

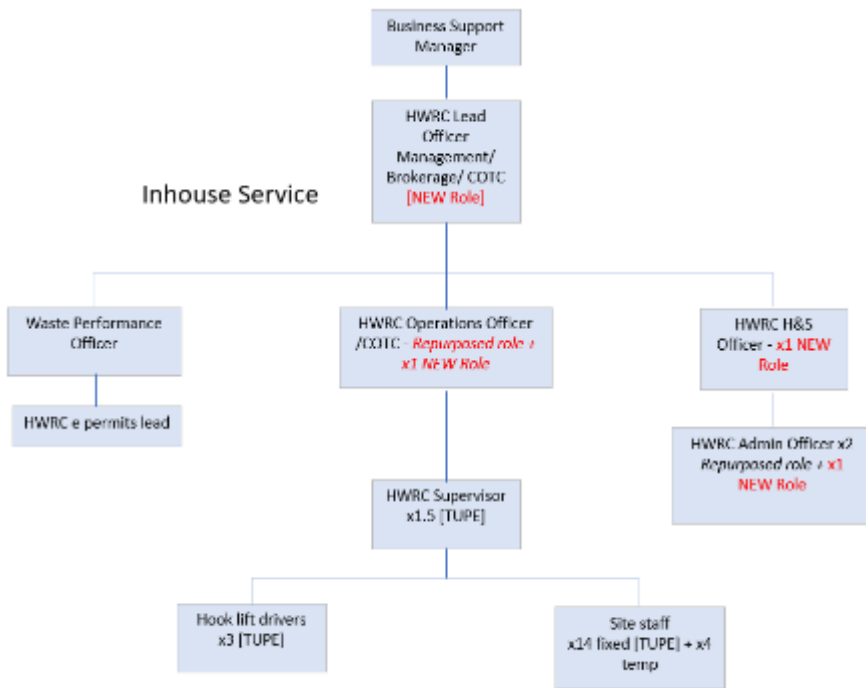
An indicative management structure for the two service options has been produced to illustrate the total number of staff required under each option and identify where new posts would need to be created, as shown in Figure 7.2.





**Figure 7.2 Inhouse and Contracted Service Envisaged Organograms**

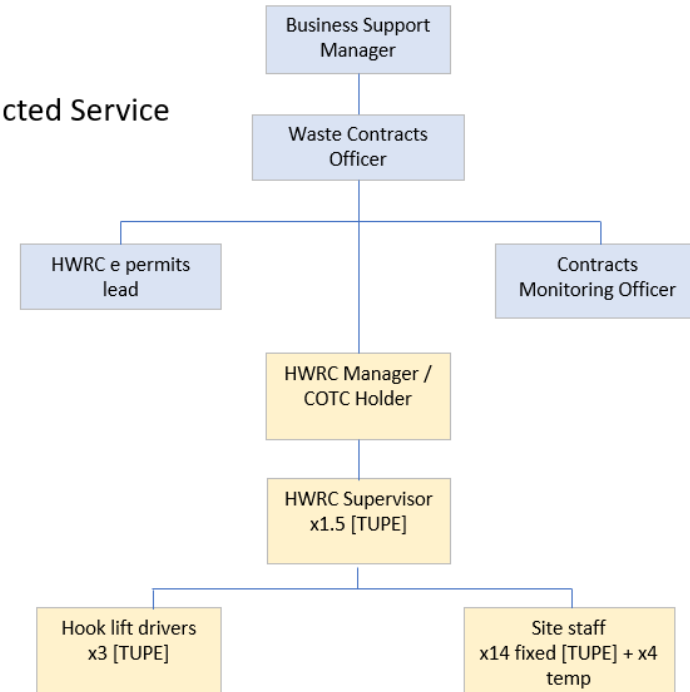
Page 693



**32.5 NNC FTEs**

*X4 Additional posts + TUPE'd staff*

**Contracted Service**



**4 NNC FTEs**



### 7.1.4 Service Delivery Costs<sup>19</sup>

**Table 7.5 Service Delivery Costs**

| Delivery Model | Comments   |
|----------------|--|
| In-house       | <ul style="list-style-type: none"> <li>• Supporters of the in-house service delivery model argue that it costs less to deliver in-house services, as a profit margin does not need to be accounted for and paid to an external service provider.</li> <li>• However, operating costs can be higher than outsourced alternatives due to limited expertise and/or experience in running similar contracts, limited established supply chains (e.g., for equipment purchase), limited economy of scale benefits and potentially higher staff costs (due to alignment with council, staffing policies, pay and pension scales).</li> <li>• Where absence and agency policies are particularly ‘generous’ or ‘long winded’ in comparison to private sector practices this may increase overall operational expenditure.</li> <li>• Meaningful benchmarking of actual services costs can be problematic with an in-house delivery model, making it more difficult to be able to demonstrate value for money.</li> <li>• The Council may also incur additional costs in ensuring the delivery of contract support (payroll, health and safety, administration, compliance etc) through either existing departments or the recruitment of additional staff.</li> </ul> |
| Outsourced     | <ul style="list-style-type: none"> <li>• Given the competitive nature of procurements, service delivery costs following re-procurement (with consideration to risks transferred to or shared with the service provider) should reflect best value that the sector can offer at a point in time.</li> <li>• Operating profit will form an element of the contract price, but the need to realise profits would ordinarily incentivise a contractor to drive operating efficiencies and reduce the Council’s costs within a competitive procurement process.</li> <li>• Service cost efficiencies are usually achieved through lower equipment costs (e.g., by using established relationships and purchasing power), implementation of advanced and cost effective service management and monitoring tools, application of innovations from other contracts, sharing of overhead costs (e.g., HR, H&amp;S, maintenance) over several contracts and enhanced management of staff productivity levels.</li> </ul>   |

A significant consideration for the in-house service delivery model relates to the total costs associated with potentially employing staff directly under the Council’s terms and conditions.

The delivery of HWRC services is relatively labour intensive and requires a significant amount of costly equipment to run the sites including on site plant/machinery.

### 7.1.5 Customer Satisfaction

**Table 7.6 Customer Satisfaction**

---

<sup>19</sup> Excluding recyclables income



| Delivery Model | Comments   |
|----------------|--|
| In-house       | <ul style="list-style-type: none"> <li>Any change of service delivery model has the potential to cause disruption to the visible face of the service, particularly in the early months of transition, and could result in reduced customer satisfaction levels.</li> <li>Under an in-house model, the Council is likely to have greater flexibility in terms of responding to customer service issues but would have a reduced ability to incentivise or enforce the achievement of specific standards which would apply to a third party service provider.</li> </ul> |
| Outsourced     | <ul style="list-style-type: none"> <li>Customer satisfaction targets could be written into a new Specification, along with performance incentives / deductions within the Performance Management Framework as required.</li> </ul>   |

Both of the options are considered to be capable of delivering high levels of customer satisfaction.

The decision to be made by the Council really hinges on whether the Council prefers to retain the responsibility for the delivery of that aspect of the service through its own management and training procedures or would prefer to have a clearly defined contractual requirement in place which ensures that failure to achieve the required target levels would incur a proportionate financial penalty.

Under an outsourced service delivery model, the Council also has the opportunity in some instances to distance itself from the Contractor in the event of service failures, to better manage reputational risk.

The greatest risk in this context lies in the potential change of service delivery model. Under either solution, there is an increased likelihood of service delivery issues arising on site, particularly in the initial months following transition, to which the Council should be ready to respond in order to minimise the potential impacts on customers and their perception of the service in general.

### 7.1.6 Flexibility to Introduce Service Changes

**Table 7.7 Flexibility to Introduce Service Changes**

| Delivery Model | Comments  |
|----------------|---|
| In-house       | <ul style="list-style-type: none"> <li>One of the main arguments put forward by advocates of the in-house service delivery model is the agile framework it provides for implementing service changes.</li> <li>There is a potential risk that service innovations which may become commonplace within private sector providers are overlooked and services 'stagnate' over time.</li> </ul>   |
| Outsourced     | <ul style="list-style-type: none"> <li>There are well established and robust change mechanisms (e.g., open book accounting) within well-structured contemporary waste sector contracts to provide a similarly agile framework for introducing service changes. Depending on the nature of service change, variations can be implemented at a cost no greater than (or at least similar to) that incurred under an in-house service delivery model.</li> <li>However, most contracts would require mutual agreement between parties to be able to introduce service changes. In some instances, there can be difficulties in securing this mutual agreement, especially if the proposed change could affect the Contractor's envisaged profit levels or</li> </ul> |



| Delivery Model | Comments  |
|----------------|---|
|                | <p>if the Contractor has incurred unrecovered losses or a reduction in profit over the term of the contract. In those circumstances, the contractor may try to recover these costs or losses (or at least a proportion of them) in tandem with the request for service variation. Such demands can constrain swift implementation of service changes.</p> <ul style="list-style-type: none"> <li>• Foreseen potential changes (e.g., site closures, reduced opening hours etc) could be mapped out as provisional items as part of a future procurement process.</li> </ul> |

It is generally accepted that the option of delivering an in-house service would provide the Council with the highest level of flexibility to refine and adapt the HWRC services as and when considered appropriate to do so. However, any changes must be in-line with internal governance procedures, potentially requiring exec sign or subject to EQIA which therefore could make for a 3-4 month process.

For outsourced services the Council should seek to secure provisional costs for any foreseen variations in the future services prior to making a commitment.

The benefits of an outsourced solution generally lie in the contractor’s ability to draw on its wider experience of service delivery to identify and adopt innovation and best practice as a natural evolution of working practices over time. Conversely an in-house solution may not be so readily able to recognise and apply similar improvements and there is an increased risk of services remaining static and potentially perceived as inferior when compared to other authorities within the region.

### 7.1.7 Service Management

**Table 7.8 Service Management**

| Delivery Model | Comments   |
|----------------|--|
| In-house       | <ul style="list-style-type: none"> <li>• It will be essential to have in place suitably skilled and experienced managerial and supervisory staff who are able to manage the services in a way which minimises impacts on the quality of service delivered whilst also providing value for money to the Council.</li> <li>• The identification and/or recruitment of appropriate individuals is a key risk in ensuring that the services are managed effectively over a prolonged period of time.</li> <li>• Management support services (e.g., finance / payroll, health and safety, environmental compliance etc) would also need to be sourced either from existing Council staff or through the recruitment of additional employees to pick up this additional workload.</li> <li>• Subject to staff contractual terms and conditions, the Council would be able to readily redeploy its resources to provide ‘ad hoc’ services and/or support other Council activities if required.</li> </ul> |
| Outsourced     | <ul style="list-style-type: none"> <li>• Specialist service providers have access to a wider pool of operating experience which can provide benefit in delivering continuous improvement and introducing innovative changes or best practice.</li> <li>• Alternative use of contractor resources would be possible to some extent but would be dictated by the terms of the contract. There can be limitations in redeploying staff to other service areas dependent on terms of liability cover. Also, such redeployment, if possible, may be subject to additional costs for the Council.</li> </ul>   |



A key risk for the Council to consider is the level of confidence in ensuring that a suitable management structure and back office support system can be put in place at the appropriate time and then maintained to ensure continued delivery of high performing and cost effective services.

An in-house solution is likely to offer greater flexibility than outsourcing in terms of deployment of contract staff and resources to deliver Council services and respond to unforeseen circumstances.

External service providers can provide benefit in terms of having wider support networks, the ability to share personnel and associated costs across different contracts, and access to evolving learning / knowledge gleaned from delivery of similar services elsewhere in the UK.

### 7.1.8 Risk Management (Financial)

**Table 7.9 Risk Management**

| Delivery Model | Comments  |
|----------------|---|
| In-house       | <ul style="list-style-type: none"> <li>The Council will be fully exposed to all financial risks and cost uncertainty of service delivery. Some of these risks include fluctuations to commodity prices, wages, pensions, claims, liabilities etc.</li> <li>There is limited long term certainty of service delivery costs compared to the other options.</li> <li>It should be noted that liability for death or personal injury due to negligence</li> </ul>   |
| Outsourced     | <ul style="list-style-type: none"> <li>The Council will have greater certainty of service delivery costs for the duration of the contract. The costs agreed at contract award will be adjusted in accordance with an agreed indexation mechanism (usually a basket of indices) and therefore the Council is protected to some extent from significant fluctuations in market rates.</li> <li>A major risk associated generally with HWRC service contracts is the recyclables price fluctuations. An outsourced contract can reduce the Council's exposure to this by providing competitive and sustainable rates (due to economies of scale commanded by the service provider) and a mechanism to share some of the recyclables price risk.</li> </ul> |

Clearly the Council's preferred option in this context will be a reflection of its agreed position on acceptance of risk.

The greater flexibility and independence offered by an in-house solution must be balanced against the understanding and acceptance of the fact that any and all financial risks would sit with the Council, with no scope to mitigate against those risks.

### 7.1.9 Risk Management (other)

**Table 7.10 Risk Management (Other)**

| Delivery Model | Comments   |
|----------------|--|
| In-house       | <ul style="list-style-type: none"> <li>Risk from insolvency of an external service provider is mitigated as the Council will own the equipment and all staff are Council staff.</li> <li>The Council would retain all other risks and liabilities associated with service delivery.</li> </ul> |



| Delivery Model | Comments   |
|----------------|--|
|                | <ul style="list-style-type: none"> <li>The Council may not have ready access to contingency arrangements (staff, materials outlets etc.) in the event of significant issues with delivery of services.</li> <li>There is the potential for significant issues to arise (e.g., fly tipping) in the event of service failure for any period of time.</li> <li>The Council will have higher reputational risk in the event of service failure or poor performance.</li> </ul>   |
| Outsourced     | <ul style="list-style-type: none"> <li>Opportunities exist for the Council to completely pass on or share some of the service delivery related risks (although this would come at a cost).</li> <li>A well-run procurement process would test, establish, and commit to appropriate risk sharing mechanisms.</li> <li>Provision of contingency arrangements and associated risks can be passed on to an external contractor through the procurement process. Contractors are likely to have access to suitable contingency measures (either via their own resources or existing relationships with sub-contractors) which would mitigate issues arising as a result of service failure.</li> <li>Risk of contractor insolvency and potential recovery of Council's losses can be limited dependent on contract terms (e.g., Parent Company Guarantee or Bond). If the Council funds the purchase of equipment, the risk of contractor insolvency would be limited as it would be able to take over the equipment and continue service delivery.</li> <li>Reputational risk to the Council from service failure or poor performance would be low compared to in-house delivery models.</li> </ul> |

As described above in the context of service management, the in-house option offers the Council a higher level of flexibility on deployment of resources to respond to other issues which may arise outside the scope of the HWRC service. However, in the event of significant issues within the HWRC service (e.g., high levels of staff absence, collapse of outlets for recyclable materials) the in-house model is unlikely to have the same ability to rapidly deliver suitable contingency arrangements.

### 7.1.10 Governance

**Table 7.11 Governance**

| Delivery Model | Comments   |
|----------------|--|
| In-house       | <ul style="list-style-type: none"> <li>This service delivery model will come under the standard governance arrangements of the Council. This has the potential for active interference from local politicians and trade union representatives in the delivery of services.</li> <li>There is also a potential to be impacted by Council-wide decisions or strikes that are not directly associated with the services.</li> </ul> |
| Outsourced     | <ul style="list-style-type: none"> <li>There are established governance arrangements to discuss contract issues on a regular basis and provide service improvements and efficiencies.</li> <li>These arrangements are usually light touch and effective.</li> </ul>  |



| Delivery Model | Comments   |
|----------------|--|
|                | <ul style="list-style-type: none"> <li>In addition, this service delivery model will have access to a whole structure of senior management and central functions who sit above the local contract management level.</li> </ul> |

Perhaps inevitably there will be added complications associated with service governance for the in-house delivery model. In this case, the proposed governance structure would need to be carefully planned and robustly assessed prior to implementation.

Contract governance models for outsourced service contracts are well established and usually serve to minimise disruption to the delivery of services which could arise as a result of additional stakeholders, interfaces and decision-making stages being brought into the governance process.

### 7.1.11 Upfront Costs

**Table 7.12 Upfront Costs**

| Delivery Model | Comments  |
|----------------|---|
| In-house       | <ul style="list-style-type: none"> <li>Quantum of upfront costs will be dependent on the extent of preparatory work and new plant and equipment required.</li> <li>Internal additional resource will be needed to identify the preferred service configuration and ensure that staff / systems are in place to monitor and manage service delivery.</li> <li>Avoids the need to carry out a major procurement exercise that would typically require an in-house procurement team to be established, with support from specialist advisors (e.g., technical, and legal).</li> <li>Ongoing smaller and multiple procurements would be required for material off takers and equipment purchasing.</li> </ul> |
| Outsourced     | <ul style="list-style-type: none"> <li>A full re-procurement process would incur additional upfront costs (e.g., external advisors).</li> <li>Council may also wish to engage in market testing as a means of gauging interest and opinions to inform the development of an attractive contract and procurement that is most likely to result in a competitive bidding process.</li> <li>Upfront costs for replacing or refurbishing plant and equipment and rebranding the service would need to be considered.</li> </ul>   |

All methods would incur potentially significant costs in establishing a 'new' service. Whilst it is possible to estimate the extent of costs associated with running a new procurement exercise, the costs involved with establishing a fully in-house service would be subject to a range of additional costs applicable to specific local / Council circumstances and therefore require detailed consideration.

### 7.1.12 Maximising Performance

Although high performance can be achieved across all forms of service model, with the correct HWRC configuration and policies there are aspects of each option which present issues when considering maximising performance.

**Table 7.13 Maximising Performance**





| Delivery Model | Comments   |
|----------------|--|
| In-house       | <ul style="list-style-type: none"> <li>• Flexibility to introduce changes at pace may allow opportunities for enhanced performance to be realised more quickly – for instance the introduction of additional materials for recycling</li> <li>• Changes to infrastructure initiated by the Council will not attract compensation / disruption issues</li> <li>• Challenges in the ability to implement staff incentivisation schemes under standard Council terms</li> <li>• Limited consequence or recourse for poor performance</li> <li>• Limitations of local expertise and experience in developing innovative performance enhancing service changes</li> </ul>   |
| Outsourced     | <ul style="list-style-type: none"> <li>• Ability to form/ specify and implement performance mechanisms that reward increased performance and penalise below target performance</li> <li>• Potential to draw upon a wider pool of resources and experience cross company to implement and improve service performance</li> <li>• Careful consideration of payment mechanism design required to ensure mutually beneficial performance outcomes and proportionate penalties</li> <li>• Performance framework design and management to ensure performance is actively monitored (and is measurable) with associated rewards and penalties being applied at the appropriate intervals</li> <li>• Transparency of performance information</li> <li>• Changes in wider waste services impacting arising and performance potential - e.g., free garden waste services or increased kerbside collection of materials historically delivered to HWRCs</li> <li>• Any changes to built infrastructure may attract compensation or disruption payments to a contractor</li> </ul> |

## 7.2 Future Service Delivery Options - Quantitative Assessment

### 7.2.1 Service Delivery Model Options

A summary of each of the potential HWRC service delivery models considered by the Council is provided below.

#### 7.2.1.1 Continued Outsourcing

The Council has a long history of delivering its HWRC services through a contract with an external service provider, currently Urbaser. This contract is a historic contract which also extends over West Northamptonshire Council. The contract ends in March 2025 and so, moving forward, a new contract would need to be procured.

The Council will be faced with undertaking a competitive re-procurement process to identify the most suitable contractor to deliver the Council's future aspirations for the service, if it chooses to continue outsourcing the HWRC service.

External advisory support (e.g., technical, legal) is likely to be required to develop robust and functional procurement and contract documents that provide best value for the Council.

Potential matters to be considered would include securing reliable TUPE information, funding of any major plant (e.g. compaction equipment or other mobile plant) required for the delivery of future services and sharing of price risk associated with recyclables (noting that in current market conditions, major service providers are reluctant to accept complete risk of





recyclables price fluctuations, but they would still typically assist in securing competitive and sustainable outlets for collected materials).

### 7.2.1.2 In-house Council Service Delivery

This model, which is currently used by a relatively small proportion of local authorities in England (the in-house delivery model is far more prevalent in Wales and Scotland) is to provide services using wholly in-house resources, i.e., staff employed directly by the respective Council using vehicles and/or equipment which are paid for by the Council.

As the Council is aware, several local authorities in England have brought HWRC services back in-house in recent years, including examples which operate a large number of sites.

The most common reasons cited for reverting to an in-house delivery model include having greater level of control over service costs and the ability to implement changes more readily to the provision of services, which under an outsourced arrangement would require formal negotiation and agreement with the contractor.

## 7.2.2 Modelling Approach

The model uses a high-level comparative approach to establish baseline costs and anticipated variation from the baseline for each service delivery option. The modelling baseline is based upon the Council's historical tonnage data and HWRC service budgets. Future costs have been forecasted in real terms based upon 2023/24 prices, therefore the impact of future inflation has been excluded.

The model includes a tonnage forecast mechanism based on potential household growth scenarios and assumptions regarding residual waste generation per household. Together these allow different growth scenarios to highlight the impact on future tonnages of residual waste and recycling received at the HWRCs – these are applied equally to the outsourced and inhouse service delivery model options.

From 2024/25 onwards, the outsourced and inhouse options have been modelled separately to account for key drivers of cost differential, particularly around staff costs and material income. This includes 'one-off' capital expenditure and ongoing operational costs.

The service delivery options have effectively been developed on a 'Business as Usual' basis, i.e., continuation of the service levels provided as of 2023/24 by the incumbent contractor. Where no significant change has been anticipated to a service area within an option, the baseline cost has been projected forward based on 2023/24 budget data.

The key assumptions incorporated within the modelling are described below.

## 7.2.3 Key Assumptions

This section summaries the key assumptions that have been taken forward through the options modelling process for both a contracted and inhouse service. This is helpful to highlight where significant differences are likely to occur between the two service models.

### 7.2.3.1 Historic Household Numbers and Future Growth

The model uses government publicised dwelling stock figures<sup>20</sup> for historic household numbers, as shown in Table 7.14.

---

<sup>20</sup> [Live tables on dwelling stock \(including vacants\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)



**Table 7.14 Historic Dwelling numbers**

| Year    | Household Numbers |
|---------|-------------------|
| 2020/21 | 153,249           |
| 2021/22 | 155,033           |
| 2022/23 | 156,576           |

The modelling baseline for future waste arisings is based on the average kg per household ‘generation rate’ observed between 2021/22 and 2022/23 (2020/21 is excluded to minimise distortion from the impacts of the Covid-19 Pandemic).

Using data from NNC’s 2022/23 Assessment of Housing Land Supply<sup>21</sup>, the baseline waste generation rate has been applied to three future household growth scenarios:

- Moderate – based on continuation of average net completions over the past 10 years;
- Low – assumes 20% below the average net completions over the past 10 years; and
- High – based on achieving 75% of the projected completions up to 2030/31, then continuation of average projected completions between 2023/24 and 2030/31.

### 7.2.3.2 Future Performance

The model assumes consistent kg/household generation rates for each waste stream across the growth scenarios, resulting in a continuation of current performance levels in terms of recycling and landfill diversion.

### 7.2.3.3 Operational and Management Staff Numbers and Salaries

Salary levels for each role have been estimated based on market intelligence including publicly available data on job advertisements and SLR’s internal databases. The key driver of cost differential between the contracted and inhouse service is the employer’s pension contribution. This is assumed to be 5% for the contracted service and 16% if an inhouse service was to be implemented, the latter of which SLR understands to reflect the Council’s standard level of contribution.

It is also assumed that some additional new staff will be required for the inhouse service, including a Material Broker and dedicated H&S Manager – functions that would be provided centrally within the outsourced service model. It is also assumed the inhouse service will require a higher level of Council-side management resource due to the additional scope of responsibility for service delivery. In practice the specific roles required will depend on the current level of experience amongst the existing waste service team and wider management support function at NNC.

### 7.2.3.4 Operational and Transition Costs

Operational costs provided by the current HWRC services contract costs including site costs, site maintenance costs, utilities, plant hire / operating costs are assumed to remain equal between the service delivery options.

One key difference between the options is the ‘one off’ setup costs associated with transitioning to a new inhouse service compared to the cost of procuring a new contract, the former of which is assumed to be higher – in practice this cost will depend on both the scale

<sup>21</sup> [North Northamptonshire Council: Assessment of housing land supply, 2022-23](#)



of change required to recruit / train the management and support the new team, the degree to which IT infrastructure and software may need to be upgraded, and how these costs are accounted for centrally.

An additional difference unique to the outsourced service is the level of contractor profit margin, which has been assumed to be 10%.

### 7.2.3.5 Material Income

Material income will vary depending on the sharing mechanism within any outsourced contract. The model assumes a similar level of income will be achieved 'per tonne' based on the current contract. However, this will of course be driven by underlying commodity prices.

Bringing the service inhouse, material income will no longer have to be shared, resulting in increased income for NNC, particularly when the secondary material markets are strong.

However, this is anticipated to be offset to some degree by less favourable rates likely to be achieved by NNC compared to a large waste contractor when trading on the material market (the contractor's broker large volumes of material pooled from multiple contracts).

The model conservatively assumes an equal level of income for each option. In practice it is anticipated that net income to an inhouse service would increase compared with baseline levels where there are real terms increases in key commodity prices. However, this also exposes the Council to greater losses during periods of market downturn.

### 7.2.3.6 Overheads

For the outsourced service, the contractor's central overheads are assumed to be 10% of the payroll cost, with the Council's overhead set at 5%. It is assumed that the Council's overheads remain the same in the outsourced service and baseline.

For the inhouse service, there are no contractor overheads, but the Council's overhead is assumed to be slightly higher at 7.5% due to the additional staff and operational support needs.

## 7.3 Modelling Outputs

The modelling results are presented below in Table 7.15. This presents the 2023/24 baseline costs alongside the average annual cost across the modelling period for each service delivery option, with a variation from the baseline presented in the final two columns.

The costs have been grouped into four areas. 'HWRC Contract / Service Delivery' represents the operational cost of delivering HWRC services either as an outsourced contract or inhouse service – this includes staff costs along with site costs etc. but excludes income from material sales and Council overheads (which are shown separately).

'Other Council Costs' includes costs associated with the HWRC services – such as waste disposal and haulage – which are not included within the current HWRC contract.

**Table 7.15 Service Delivery Modelling Outputs**

| Cost Area                        | Baseline<br>(2023/24) | Average Annual Cost |            | Comparison from Baseline |          |
|----------------------------------|-----------------------|---------------------|------------|--------------------------|----------|
|                                  |                       | Contracted          | Inhouse    | Contracted               | Inhouse  |
| HWRC Contract / Service Delivery | £1,830,000            | £2,130,000          | £2,190,000 | £310,000                 | £360,000 |
| Other Council costs              | £1,150,000            | £1,170,000          | £1,210,000 | £10,000                  | £50,000  |



| Cost Area          | Baseline<br>(2023/24) | Average Annual Cost |                   | Comparison from Baseline |                 |
|--------------------|-----------------------|---------------------|-------------------|--------------------------|-----------------|
|                    |                       | Contracted          | Inhouse           | Contracted               | Inhouse         |
| Material Income    | -£410,000             | -£440,000           | -£440,000         | -£30,000                 | -£30,000        |
| Council Overheads  | £50,000               | £50,000             | £100,000          | £0                       | £50,000         |
| <b>Total (net)</b> | <b>£2,620,000</b>     | <b>£2,910,000</b>   | <b>£3,060,000</b> | <b>£290,000</b>          | <b>£430,000</b> |

Overall, the results indicate that it is likely costs for both an outsourced and inhouse service delivery model will be higher than the baseline costs, with an outsourced model anticipated to cost c.£140k less per annum than the inhouse option, primarily due to reduced staff payroll costs.

The outsourced option is anticipated to cost in the region of £2.9m per annum including annualised procurement costs, c.10% above the 2023/24 baseline cost. The inhouse service is anticipated to cost c.£3.0m per annum (including annualised internal setup costs), c.15-17% above the baseline cost.

It is important to note that the model results illustrate what is the most likely cost outcome, based on the assumptions set out in section 7.2.3. As discussed in section 7.1, there are financial risks associated with each delivery model which could affect the actual service cost – however an outsourced contract is considered likely to incur a slightly lower annual cost, assuming there is no requirement for significant contractual variations during the contract period.



## 8.0 Conclusions

### 8.1 Service Review

The existing HWRC service is a product of a long-term, legacy contract developed and procured by Northamptonshire County Council since then the sector and demands on HWRC services have changed considerably. The advent of new and emerging legislation and broad financial pressures experienced by councils has created a need for HWRC facilities to adapt and change significantly within the last decade.

This produced a reduction in the initial contracted requirement in respect of opening hours and days meet and greet services, to meet savings targets. Many of the aspects of the existing contract represent best practice in the delivery of HWRC services. For example, the extent to which risk is shared between NNC and the contractor for commodity values.

The current network of HWRCs is well distributed to serve the local population and in many areas delivers good quality and value services. Two of the four HWRCs (Corby and Wellingborough) need immediate attention to ensure they are retained and enhanced to manage the demands of the impending new services period.

A rationalisation of the existing provision is not recommended in the immediate term. This is based on the anticipated future arising demands as a product of a growing population within the Council area. High level modelling indicates that the existing network capacity is acceptable based on current demand but would not cope with a reduction from four to three HWRCs. None of the remaining facilities could feasibly absorb the displaced volumes within reasonable proximity to residents. Benchmarking activity also suggests that the current provision (on a total number of households per HWRC basis) appears comparable to councils with similar geographic and demographic characteristics.

Consideration should be given to the need to review and evolve existing HWRC policies to ensure that the Council is not left exposed to increase arisings and costs. The need to review the approach to cross border controls, in view of the existing and developing neighbour council positions, should be investigated alongside existing vehicle policies to ensure the correct balance of fair use and restricting abuse is matched to evolving vehicle types (crew cab pickups are currently unrestricted but are often registered and used as commercial vehicles).

Polices targeting improved performance by seeking to influence and change user behaviour could also be investigated further to increase performance and reduce disposal costs. Case study examples indicate that significant improvements in performance can be achieved with the correct policy transitions and overarching service support from service teams and elected Members, examples of which include black back sorting policies and the potential use of booking systems.

### 8.2 Future Service Delivery Options Assessment

#### 8.2.1 Timeframe, Resources and Capability

A high level assessment of the likely governance, transition arrangements, projects and activities required to insource HWRC services suggests a minimum period of between 18 and 24 months would be required to allow NNC to bring the service in house. This would include a feasibility assessment to identify in detail the current condition of the HWRCs, the future asset and resourcing requirements and the activity required to transition contracted staff.



Based on the time available until the current contract expiry, and the limited resources available within the existing waste service structure dedicated to the HWRCs, bringing the service fully inhouse would appear to be a significant challenge for the Council.

The formation of the two unitary councils and disaggregation of the waste teams has produced a knowledge and capability gap within this particular area of service delivery. This represents a significant barrier to the development of an adequate programme with supporting projects to deliver the change from the existing contracted service delivery model to a fully insourced function within the remaining time period.

Additional resources and technical capability can be provided on a fixed term basis to deliver such change, but with existing governance and senior management positions still in flux a clear route with active programme sponsorship is not apparent.

### **8.2.2 Qualitative Assessment**

The qualitative assessment of the two service delivery options is summarised in Table 7.1 based on a common list of themes to demonstrate the balance of control, costs and risks between the two options.

Both approaches have proven examples for delivering cost effective and efficient HWRC services across the UK. The decision between the two often relates to a council's corporate priorities and alignment to other service areas where synergies can often be achieved for both contracted and inhouse examples.

Early engagement activity conducted with elected Members as part of SLR's commission identified no strong preference toward either option in a qualitative sense.

### **8.2.3 Quantitative Assessment**

The modelling approach detailed in sections 7.2 and 7.3 provides an indicative identification of the major cost differences between the two options (contracted or inhouse service delivery). In agreement with Council officers, this approach neutralised a variety of factors which were deemed to be similar or identical between each option, such as arisings and equipment costs and focused on key areas where the delivery models varied.

The cost of staffing and the likely incorporation into the Council pension scheme of TUPE'd staff at the appropriate time represented the most significant difference. However, full visibility of existing staffing costs has not been achievable and a range of proxy values and assumptions for labour costs have been developed with Council officers.

In addition to the pension burden, it is envisaged that a total of four additional roles would be required within the 'client' / new operational function of an inhouse service to manage the increased resource demand and to provide specific skillsets and capabilities required to operate the HWRC service.

In both instances, the cost of new service delivery is anticipated to increase by at least 10% for a new contracted service and between 15% and 17% for a fully insourced service. The cost difference between the two options per annum is in the region of £140,000, but this does not account for any differences in capital purchasing power or preferential commodity rates based on aggregated companywide volumes, which are likely to be achieved by a third party contractor.

### **8.2.4 Delivery Model Recommendation**

Based on the information gathered as part of this commission, and the high-level modelling and assessment conducted, it appears that based on the timescale, internal resources and capability and indicative costs that a contracted service delivery model should continue to be the preferred approach to the next phase of service delivery.





This recommendation is however provided in the absence of early market engagement. It is therefore recommended that the Council arranges market engagement activity to confirm the market position and review this approach at its earliest convenience.

Should NNC's position move towards a preference for delivery of inhouse services then the term of any future outsourced contract should be designed accordingly, to allow a suitable transition period for the Council to adequately prepare and support inhouse delivery.

## 8.3 Infrastructure Development

A range of high level costed infrastructure improvements have been developed in consultation with SLR's civil engineering team and are detailed in section 5.0.

These suggested improvements are intended to indicate areas for potential improvement and enhancement at each of the existing HWRCs. The potential developments seek to provide additional capacity, service flexibility and accessibility in the short to medium term to allow the existing HWRC network to cope with the forecast demands on the services due to population growth.

Capital expenditure at each of the HWRCs would require enhanced feasibility investigation in most, if not all of the recommendations, to establish viability and achievability. Delivery of improvements at both Corby and Wellingborough HWRCs should be prioritised to address the issues identified at these facilities in section 4.2. Investments in these facilities alone (where viability and achievability have been validated via detailed feasibility work) total in the region £3.0-3.5m.

### 8.3.1 Capital Works

In line with the delivery model recommendation the Council could use a new contracted provision to commission the improvement and development of HWRC infrastructure across the Council area.

This approach has the potential to draw in the expertise and experience of the contracted provider in developing similar facilities, alongside overcoming any potential resourcing constraints and capacity within NNC.

Provision of the capital by both parties or a single party will need to be evaluated as part of any tender process. Understanding access to and availability of funding, including borrowing rates that each party can access, are important considerations.

## 8.4 Next Steps

The following sections provide an overview of the likely activity required to prepare and equip the Council for the delivery of the next HWRC service period. It is recommended that a dedicated programme or project is established and adequately resourced to manage and deliver the change.

### 8.4.1 Procurement

Early engagement with internal procurement and legal departments will be essential in developing a new contract opportunity. The use of technical advisers may also be required for certain aspects of the contract design and tender evaluation processes. The following considerations need to be established by the Council.

4. Conduct market engagement with relevant suppliers to establish service interest and contractual 'red lines'.
5. Confirm and commission all hand back arrangements with the incumbent contractor including:



- a. Any condition surveys or handover plans required as part of existing contractual terms; and
  - b. Complete and agree asset registers with the incumbent contractor to determine the extent and potential cost of new assets and equipment.
  - c. Produce a viable cost estimate for the level of capital expenditure required to deliver a new service – number of containers and bespoke equipment.
6. Develop a procurement strategy which includes well planned market engagement, assessment of the condition of the HWRCs, the extent of asset ownership and engagement with key NNC stakeholders to define key service outcomes and priorities including:
- a. **Preferred procurement route** considering the likely changes required to the existing cost and risk profiles;
  - b. **Contract design** – including term and key contractual clauses, including but not limited to; change in law, liabilities, and extension provisions
  - c. **Specification design** - to deliver the desired service outcomes;
  - d. **Payment and performance mechanisms** – designed to reflect the change in market conditions, the potential to deliver greater transparency and to incentivise the desired contractor behaviour;
  - e. **KPIs** - design of realistic and proportionate performance measures, which will be monitored for the contract duration;
  - f. **Bidder information** - collating and producing essential service information to assist bidders in delivering well informed pricing;
  - g. **Asset decisions** - determining how service assets should be provided and how ownership and lease arrangements should be managed;
7. Establish and confirm the governance and approval pathway within internal democratic structures. This will ensure key approval dates can be aligned within the design of the procurement process.

Via procurement design and contract mechanisms, NNC will have the ability to consider and potentially deliver improvements to the service which are discussed in full in sections 5.0 and 6.0. However, the objectives of any procurement should be carefully considered and managed to understand NNC's priorities in respect of the service.

A wide range of improvements to the HWRCs have been identified, but these must be set in the context of NNC's financial, political, economic, environmental, and social parameters. A significantly enhanced and highly flexible service may not deliver on the Councils priorities.

#### **8.4.2 Secure an Extension to the Corby HWRC Lease**

Spatial analysis and service demand has indicated that a need clearly exists for an HWRC within the Corby area. The expiry of the existing lease does however present an issue in the continuation of services from the existing location.

The term of the lease is linked to the end of the existing contract. It is understood that Council officers have commenced engagement with the landlord. Confirmation of the use of the facility (or not) should ideally be in place at the point of formal tender release to provide certainty over bidding.





### **8.4.3 Capital Works**

It is recommended that NNC engages and establishes a formal business case approach to delivering infrastructure improvement over the short and medium term. This may involve entry of schemes into the internal Council capital programme or exploring the delivery of infrastructure via a contracted service provider.

A formalised need and sustained commitment to improving existing and future HWRC infrastructure is required to ensure the network of HWRCs is fit for purpose for the next service delivery period and beyond.

As a new Unitary Council, the incorporation of waste collection for waste disposal functions presents an opportunity to the Council when considering infrastructure development. SLR's experience suggests that there are clear synergies that can be achieved when considering the requirements of the waste collection, transfer and HWRC provision.

Therefore, the development of a capital programme may wish to consider a wider more holistic view of waste services infrastructure development.



## Appendix A HWRC Opening hours

| HWRC Sites                    |                   | Opening Times |          |          |          |          |          |          |
|-------------------------------|-------------------|---------------|----------|----------|----------|----------|----------|----------|
|                               |                   | Mon           | Tues     | Wed      | Thu      | Fri      | Sat      | Sun      |
| <b>North Northamptonshire</b> | Corby             | 10am-6pm      | 10am-6pm | Closed   | Closed   | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | Kettering         | Closed        | Closed   | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | Rushden           | Closed        | Closed   | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | Wellingborough    | 10am-6pm      | 10am-6pm | Closed   | Closed   | 10am-6pm | 10am-6pm | 10am-6pm |
| <b>Rutland</b>                | Cottesmore        | 10am-6pm      | Closed   | Closed   | Closed   | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | North Luffenham   | Closed        | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm |
| <b>Harborough</b>             | Kibworth          | 9am-7pm       | Closed   | Closed   | 9am-7pm  | 9am-7pm  | 9am-7pm  | 9am-7pm  |
|                               | Market Harborough | 9am-7pm       | 9am-7pm  | 9am-7pm  | Closed   | Closed   | 9am-7pm  | 9am-7pm  |
| <b>West Northamptonshire</b>  | Brixworth         | 10am-6pm      | Closed   | Closed   | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | Daventry          | 10am-6pm      | 10am-6pm | Closed   | Closed   | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | Farthinghoe       | 9am-5pm       | 9am-5pm  | 9am-5pm  | 9am-5pm  | 9am-5pm  | 9am-5pm  | 9am-5pm  |
|                               | Ecton Lane        | 10am-6pm      | Closed   | Closed   | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | Sixfields         | Closed        | 10am-6pm | 10am-6pm | Closed   | 10am-6pm | 10am-6pm | 10am-6pm |
|                               | Towcester         | 10am-6pm      | Closed   | Closed   | 10am-6pm | 10am-6pm | 10am-6pm | 10am-6pm |
| <b>Milton Keynes</b>          | Bleak Hall        | 7am-7pm       | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  |
|                               | Newport Pagnell   | 7am-7pm       | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  |
|                               | New Bradwell      | 7am-7pm       | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  | 7am-7pm  |
| <b>Bedford</b>                | Barkers Lane      | 9am-5pm       | 9am-5pm  | 9am-5pm  | 9am-5pm  | 9am-5pm  | 9am-7pm* | 9am-5pm  |
| <b>Huntingdonshire</b>        | Alconbury         | 8am-5pm       | 8am-5pm  | 8am-5pm  | 8am-5pm  | 8am-5pm  | 8am-5pm  | 8am-5pm  |
|                               | Bluntisham        | 8am-5pm       | 8am-5pm  | 8am-5pm  | 8am-5pm  | 8am-5pm  | 8am-5pm  | 8am-5pm  |
|                               | St Neots          | 8am-6pm       | 8am-6pm  | 8am-6pm  | 8am-6pm  | 8am-6pm  | 8am-6pm  | 8am-6pm  |
| <b>City of Peterborough</b>   | Fengate           | 8am-6pm       | 8am-6pm  | 8am-6pm  | 8am-6pm  | 8am-6pm  | 8am-6pm  | 8am-6pm  |
| <b>South Kesteven</b>         | Grantham          | 9am-4pm       | 9am-4pm  | Closed   | Closed   | 9am-4pm  | 9am-4pm  | 9am-4pm  |



# Appendix B    Benchmarking Questionnaire



# Appendix C Key Assumptions



**Table 8.1 Project household numbers (moderate, low and high)**

| Annual household growth scenario | 2023 / 24 | 2024 / 25 | 2025 / 26 | 2026 / 27 | 2027 / 28 | 2028 / 29 | 2029 / 30 | 2030 / 31 | 2031 / 32 | 2032 / 33 | 2033 / 34 | 2034 / 35 | 2035 / 36 | 2036 / 37 | 2037 / 38 | 2038 / 39 |
|----------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Low                              | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     | 1,337     |
| Moderate                         | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     | 1,671     |
| High                             | 2,210     | 2,343     | 2,169     | 2,152     | 2,457     | 2,139     | 1,754     | 1,428     | 2,082     | 2,082     | 2,082     | 2,082     | 2,082     | 2,082     | 2,082     | 2,082     |

| Resulting number of households | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/ 33 | 2033/ 34 | 2034/ 35 | 2035/ 36 | 2036/ 37 | 2037/ 38 | 2038/ 39 |
|--------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Low                            | 157,913  | 159,249  | 160,586  | 161,922  | 163,259  | 164,595  | 165,932  | 167,268  | 168,605  | 169,942  | 171,278  | 172,615  | 173,951  | 175,288  | 176,624  | 177,961  |
| Moderate                       | 158,247  | 159,917  | 161,588  | 163,259  | 164,930  | 166,600  | 168,271  | 169,942  | 171,612  | 173,283  | 174,954  | 176,624  | 178,295  | 179,966  | 181,637  | 183,307  |
| High                           | 158,786  | 161,129  | 163,298  | 165,450  | 167,907  | 170,046  | 171,800  | 173,228  | 175,310  | 177,391  | 179,473  | 181,554  | 183,636  | 185,717  | 187,799  | 189,881  |
| Modelled household numbers     | 158,247  | 159,917  | 161,588  | 163,259  | 164,930  | 166,600  | 168,271  | 169,942  | 171,612  | 173,283  | 174,954  | 176,624  | 178,295  | 179,966  | 181,637  | 183,307  |



**Table 8.2 Staff Salary assumptions – unit cost per FTE**

| Staff                               | Salaries           |                  |
|-------------------------------------|--------------------|------------------|
|                                     | Contracted Service | In house Service |
| Administrator                       | £26,000            | £26,000          |
| Processing Operational Manager      | £55,000            | £55,000          |
| Supervisor                          | £31,500            | £31,500          |
| Site operatives (Site Staff/Agency) | £25,200            | £25,200          |
| Operational Administrators          | £26,000            | £26,000          |
| Drivers                             | £27,500            | £27,500          |
| Material Broker                     | £50,000            | £50,000          |
| H&S Manager                         | £35,000            | £35,000          |
| Waste Service Officer               | £28,376            | £28,376          |
| Waste Performance Officer           | £35,000            | £51,026          |
| Waste Contracts Officer             |                    | £30,209          |
| Overtime                            | 5%                 | 5%               |
| PPE                                 | £450               | £450             |
| Training                            | £250               | £250             |
| Apprenticeship Levy                 | 0.5%               | 0.5%             |
| National Insurance                  | 14%                | 14%              |
| Pension (Contractor)                | 5%                 |                  |
| Pension (Council)                   | 16%                | 16%              |
| Holiday / sick cover                | 10%                | 10%              |

**Table 8.3 Number of FTE**

| Staff (FTE)           | FTE                |                  |
|-----------------------|--------------------|------------------|
|                       | Contracted Service | In house Service |
| Site Staff            | 14                 | 14               |
| Agency Staff          | 4                  | 4                |
| Drivers               | 3                  | 3                |
| Supervisors           | 1                  | 1                |
| Admin                 | 1                  | 1                |
| Assistant Ops Manager | 1                  | 1                |
| Ops Manager           | 1                  | 2                |



| Staff (FTE)               | FTE                |                  |
|---------------------------|--------------------|------------------|
|                           | Contracted Service | In house Service |
| Material Broker           | 0.25               | 1                |
| H&S Manager               | 0.5                | 1                |
| Waste Service Officer     | 1                  | 1                |
| Waste Performance Officer | 1                  | 1                |
| Waste Contracts Officer   | 1.5                | 2.5              |
| <b>Total</b>              | <b>29.25</b>       | <b>32.5</b>      |

**Table 8.4 HWRC Contract Cost (2024/25)**

| HWRC Contract Cost  | Contracted Service | In house Service |
|---|--------------------|------------------|
| Site costs (e.g., security, signage, consumables, permits etc.) | £48,000            | £48,000          |
| Site maintenance allowance                                      | £40,000            | £40,000          |
| Utilities   | £30,000            | £30,000          |
| Admin and office expenses                                       | £6,000             | £6,000           |
| Plant hire and operating costs                                  | £320,000           | £320,000         |

**Table 8.5 Other Costs to the Council (2024/25)**

| Council Costs                        | Contracted Service | In house Service |
|--------------------------------------|--------------------|------------------|
| One Off Procurement costs            | £200,000           | £0               |
| Annual Procurement costs             | £0                 | £20,000          |
| Internal Set Up Costs                | £200,000           | £500,000         |
| Rents and Leases                     | £55,650            | £55,650          |
| Service Charges                      | £0                 | £0               |
| Professional Fees and Hired Services | £0                 | £0               |
| Payments to Other Local Authorities  | £0                 | £0               |
| Traffic Signs and Lines Maintenance  | £0                 | £0               |
| Waste Disposal                       | £155,998           | £155,998         |
| Specialist Waste Disposal            | £353,917           | £353,917         |
| Landfill Tax                         | £663,735           | £663,735         |
| HWRC Contracts                       |                    |                  |



| Council Costs                               | Contracted Service | In house Service |
|---|--------------------|------------------|
| Waste Transportation                        | £322,020           | £322,020         |
| Internal Recharges                          | £7,110             | £7,110           |
| Cost recovery from Outside Bodies           | -£384,060          | -£384,060        |
| Sales - General                             | £0                 | £0               |
| Issue of Certificates, Permits and Licences | -£24,010           | -£24,010         |
| Building Repair and Maintenance             | £4,000             | £4,000           |
| Grounds Maintenance                         | £0                 | £0               |
| Contractual Income                          | £0                 | £0               |
| Cleaning and Domestic Supplies              | £0                 | £0               |
| Profit Margin                               | 10%                | 0%               |

**Table 8.6 Material Income assumptions**

| Material Income                      | Contracted Service | In house Service |
|--------------------------------------|--------------------|------------------|
| Mixed Paper and Cardboard            | -£78.54            | -£78.54          |
| Cardboard                            | £0.00              | £0.00            |
| Paper                                | £0.00              | £0.00            |
| Household Batteries                  | £0.00              | £0.00            |
| Metal (Ferrous)                      | -£137.08           | -£137.08         |
| Metal (Ferrous) (2)                  | -£124.53           | -£124.53         |
| Chargeable DIY - Metal (Ferrous)     | £0.00              | £0.00            |
| Metal (Non-Ferrous)                  | -£587.82           | -£587.82         |
| Chargeable DIY - Metal (Non-Ferrous) | £0.00              | £0.00            |
| Fridges & Freezers (Units x 45kg)    | £0.00              | £0.00            |
| Fridges & Freezers (Units x 45kg)    | £0.00              | £0.00            |
| CRT's (Units x 20kg)                 | £0.00              | £0.00            |
| Glass                                | -£15.79            | -£15.79          |
| Hard Plastics                        | £0.00              | £0.00            |
| Hard Plastics                        | £0.00              | £0.00            |
| Plastic Bottles                      | £0.00              | £0.00            |





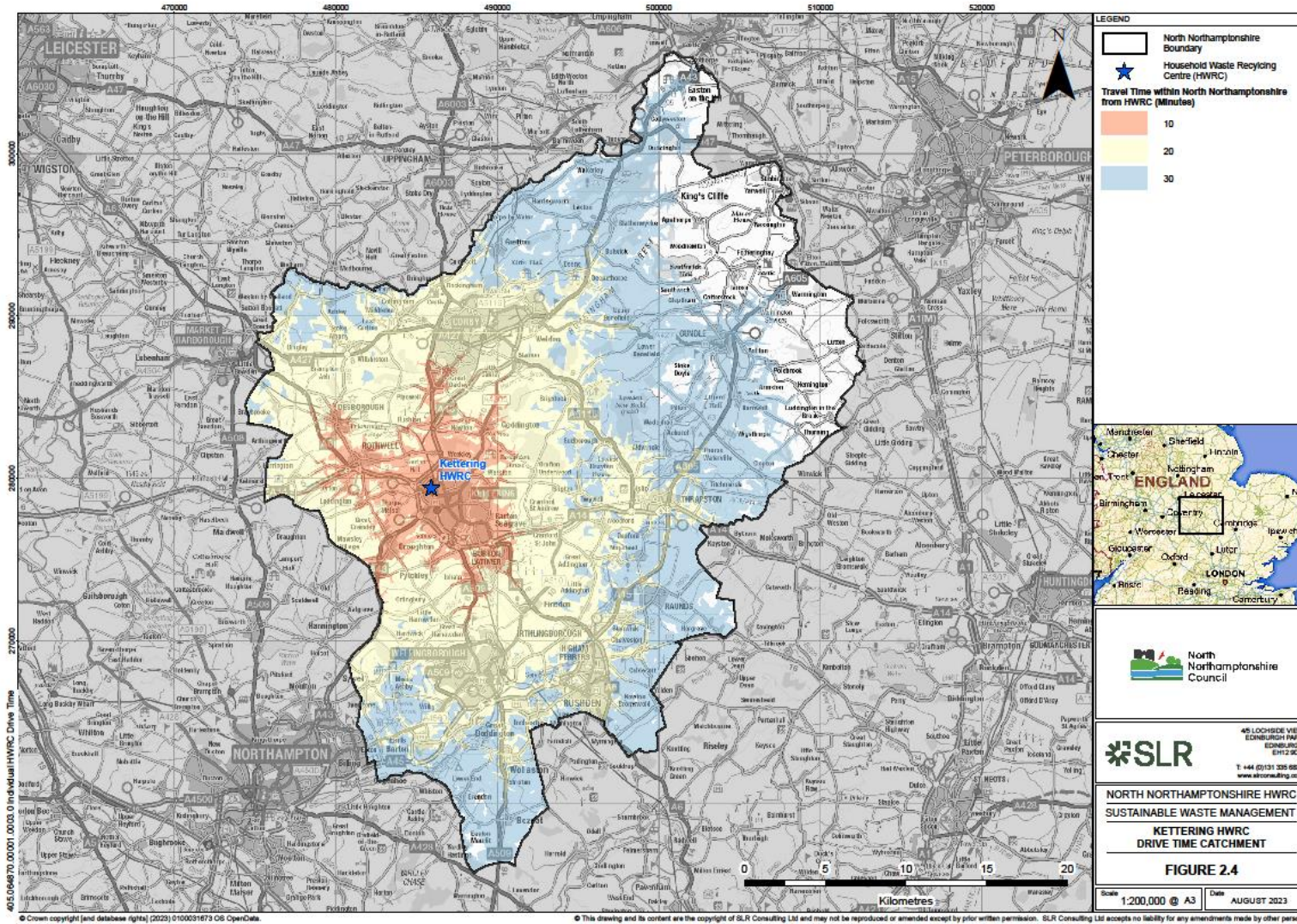
| Material Income  | Contracted Service | In house Service |
|--|--------------------|------------------|
| Plastic Bottles  | £0.00              | £0.00            |
| Textiles   | -£132.41           | -£132.41         |
| Automotive Oil (1 gallon - 4.5461 litres)              | £0.00              | £0.00            |
| Automotive Batteries                                   | £0.00              | £0.00            |
| Automotive Batteries                                   | £0.00              | £0.00            |
| Fluorescent Tubes (Container x 60kg)                   | £0.00              | £0.00            |
| Small Domestic Appliances                              | £0.00              | £0.00            |
| Large Domestic Appliances                              | -£137.09           | -£137.09         |
| Large Domestic Appliances (2)                          | -£124.40           | -£124.40         |
| Aerosols   | £0.00              | £0.00            |
| Oil Filters  | £0.00              | £0.00            |
| Paints   | £0.00              | £0.00            |
| Chargeable DIY - Paints                                | £0.00              | £0.00            |
| Other Hazardous Chemicals                              | £0.00              | £0.00            |
| Plastics Contaminated with Oil                         | £0.00              | £0.00            |
| Mixed Road Fuel  | £0.00              | £0.00            |
| Waste Oil Absorbents                                   | £0.00              | £0.00            |
| Antifreeze   | £0.00              | £0.00            |
| Waste Cooking Oil                                      | £0.00              | £0.00            |
| Waste Packaging Contaminated with Cooking Oil          | £0.00              | £0.00            |
| Tetra Packs  | £0.00              | £0.00            |
| Carpet   | £0.00              | £0.00            |
| Printer Ink Cartridges                                 | £0.00              | £0.00            |
| Trade Waste Upholstered Domestic Seating (WUDS) - POPS | -£192.60           | -£192.60         |
| Trade (Recovered/Thermal treatment) - Wood             | -£30.24            | -£30.24          |
| Total Trade  | -£4.09             | -£4.09           |



## Appendix D Travel Distances



Table 8.7 Drive Time Analysis – Wellingborough HWRC

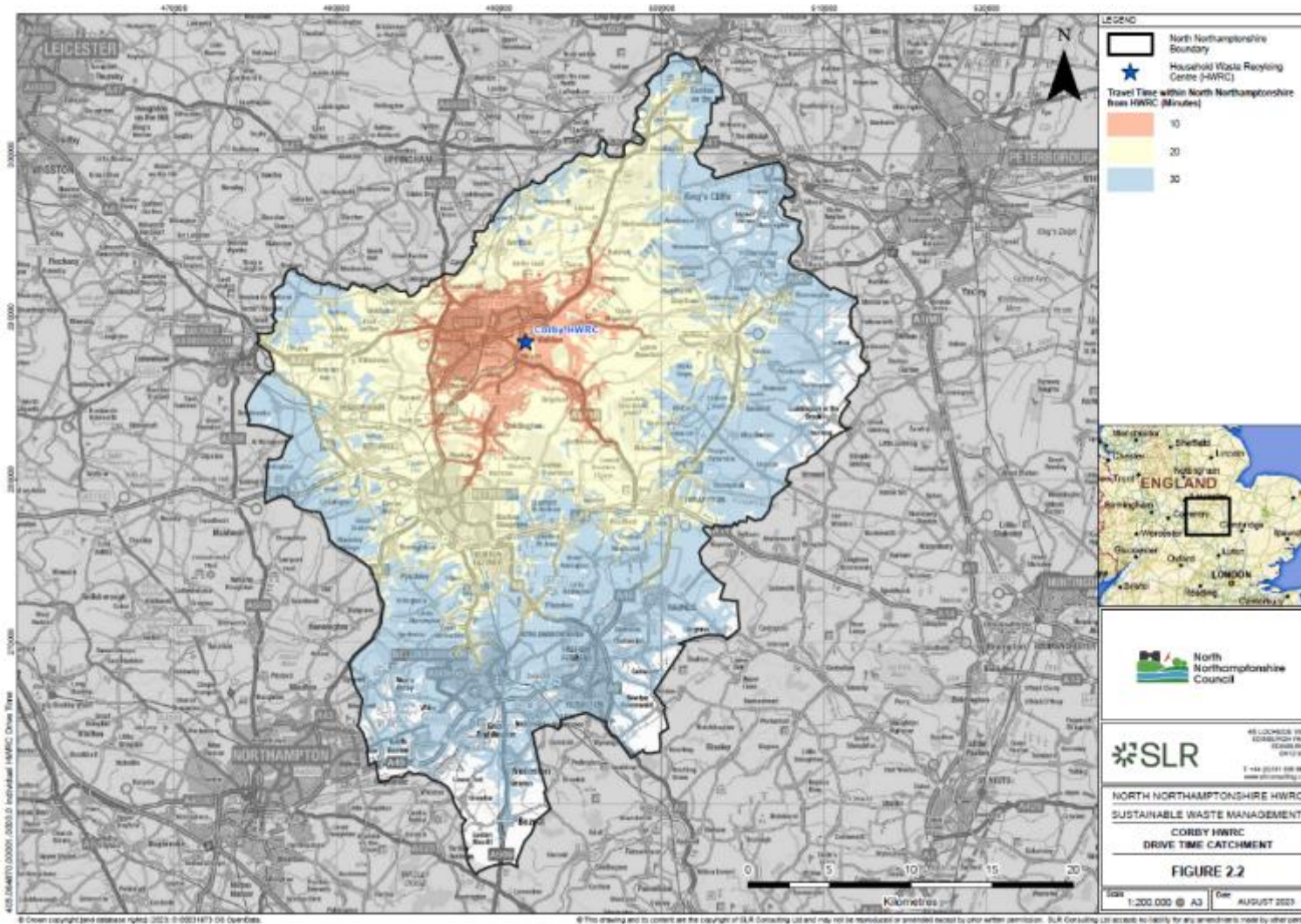


Page 719

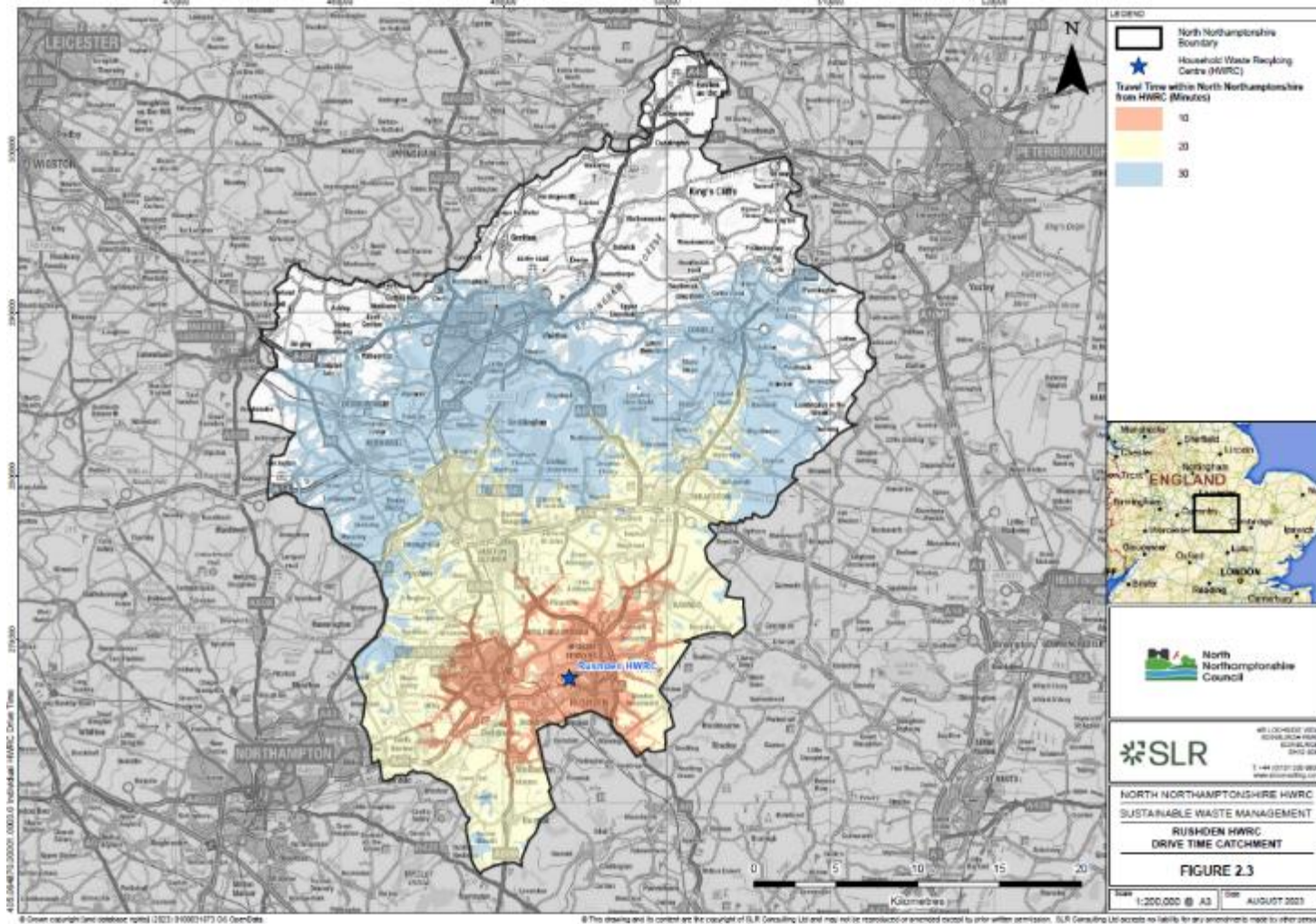




**Table 8.8 Drive Time Analysis – Corby HWRC**

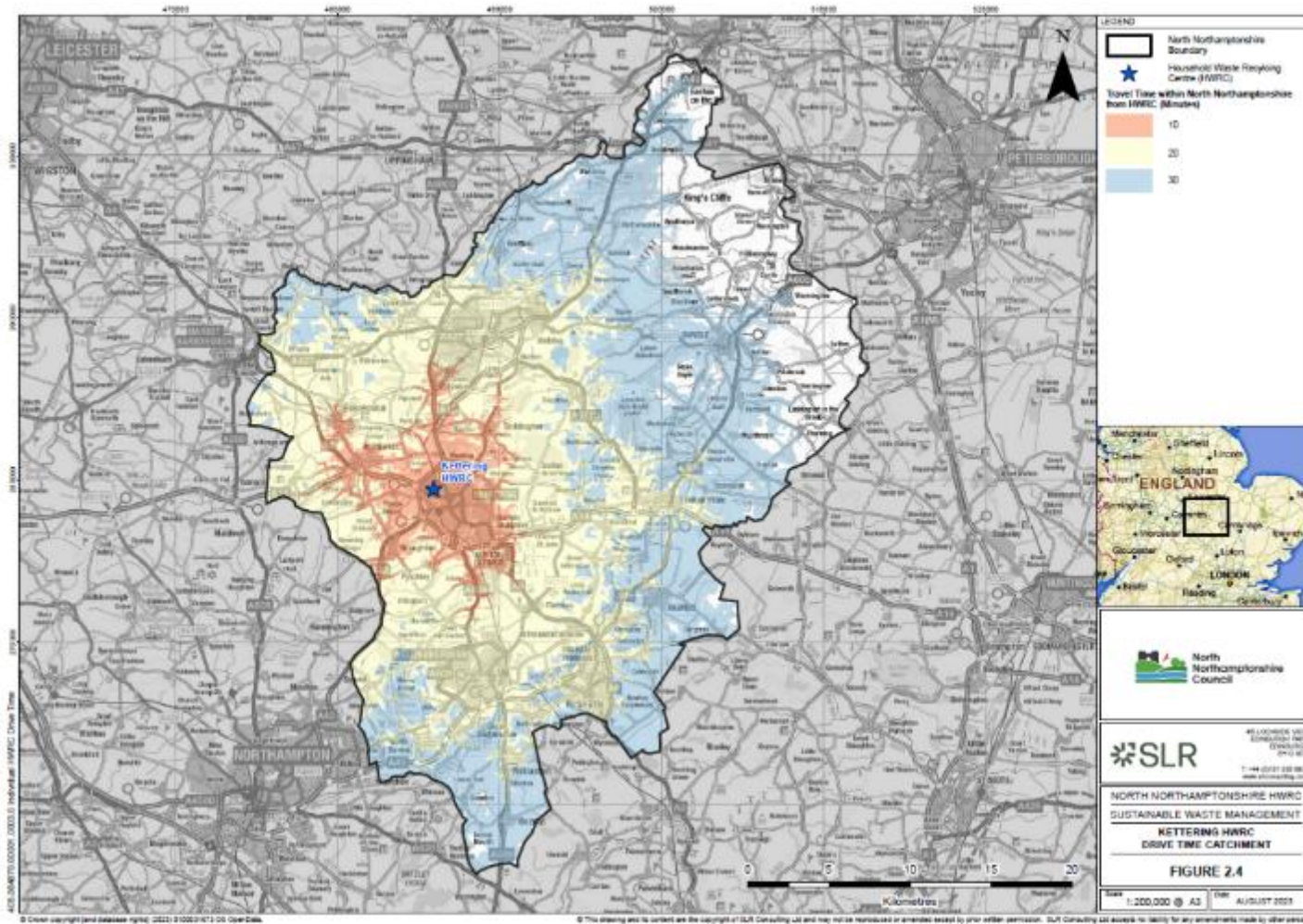


**Table 8.9 Drive Time Analysis - Rushden**





**Table 8.10 Drive Time Analysis - Kettering**

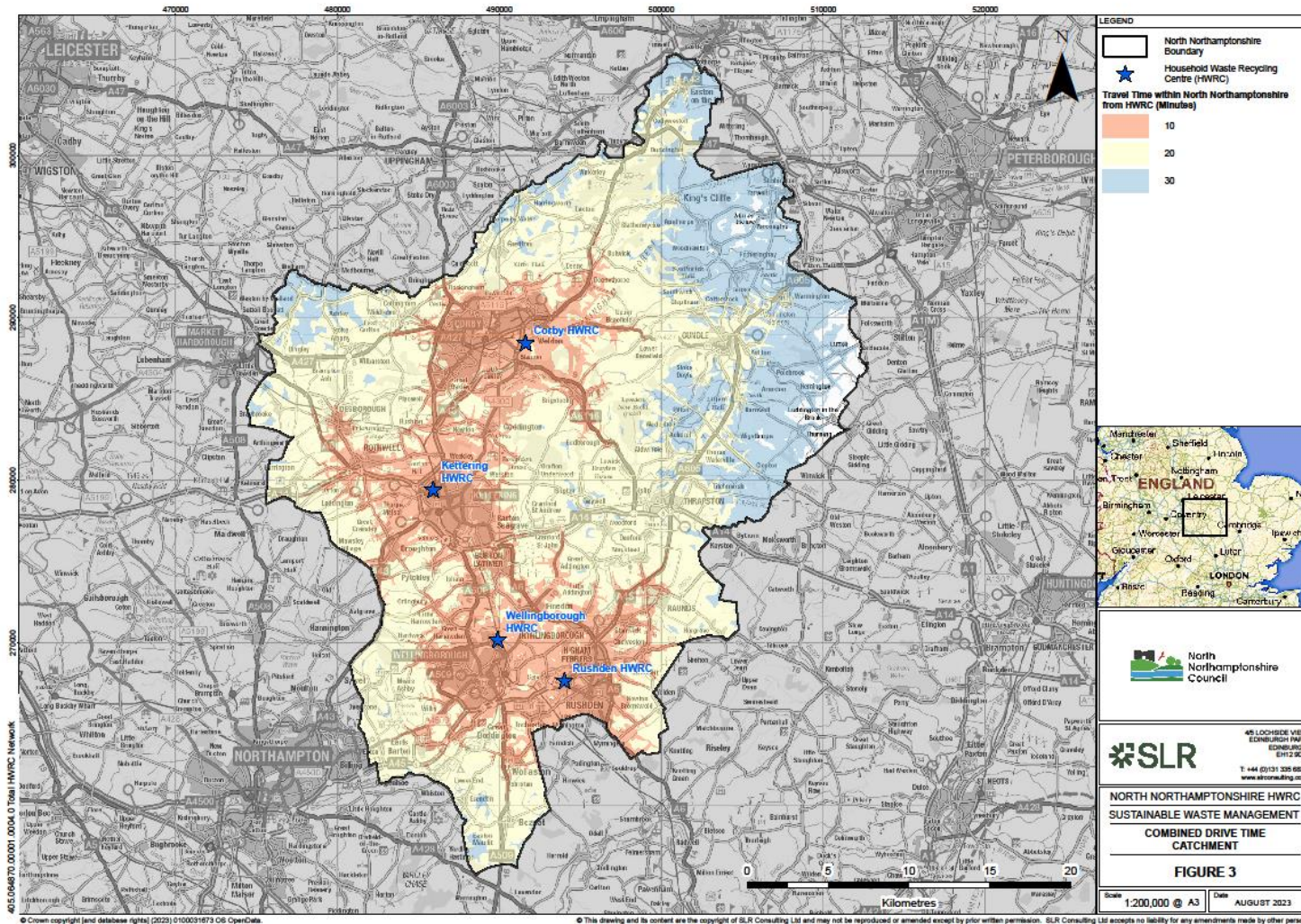


Page 722





Table 8.11 Drive Time Analysis – Total HWRC Network



Page 723





Table 8.12 Drive Time Analysis (HWRC Network including new site)

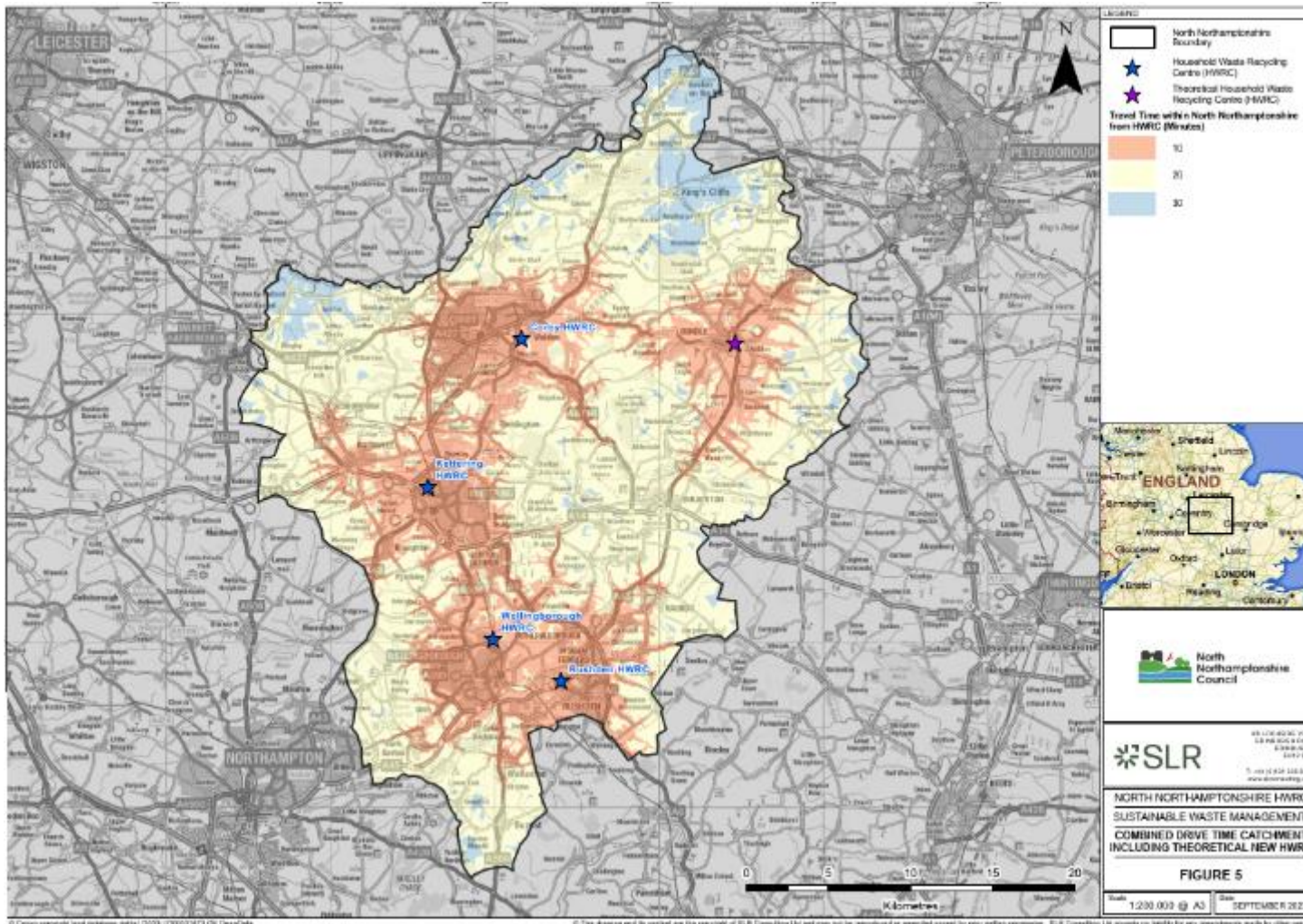
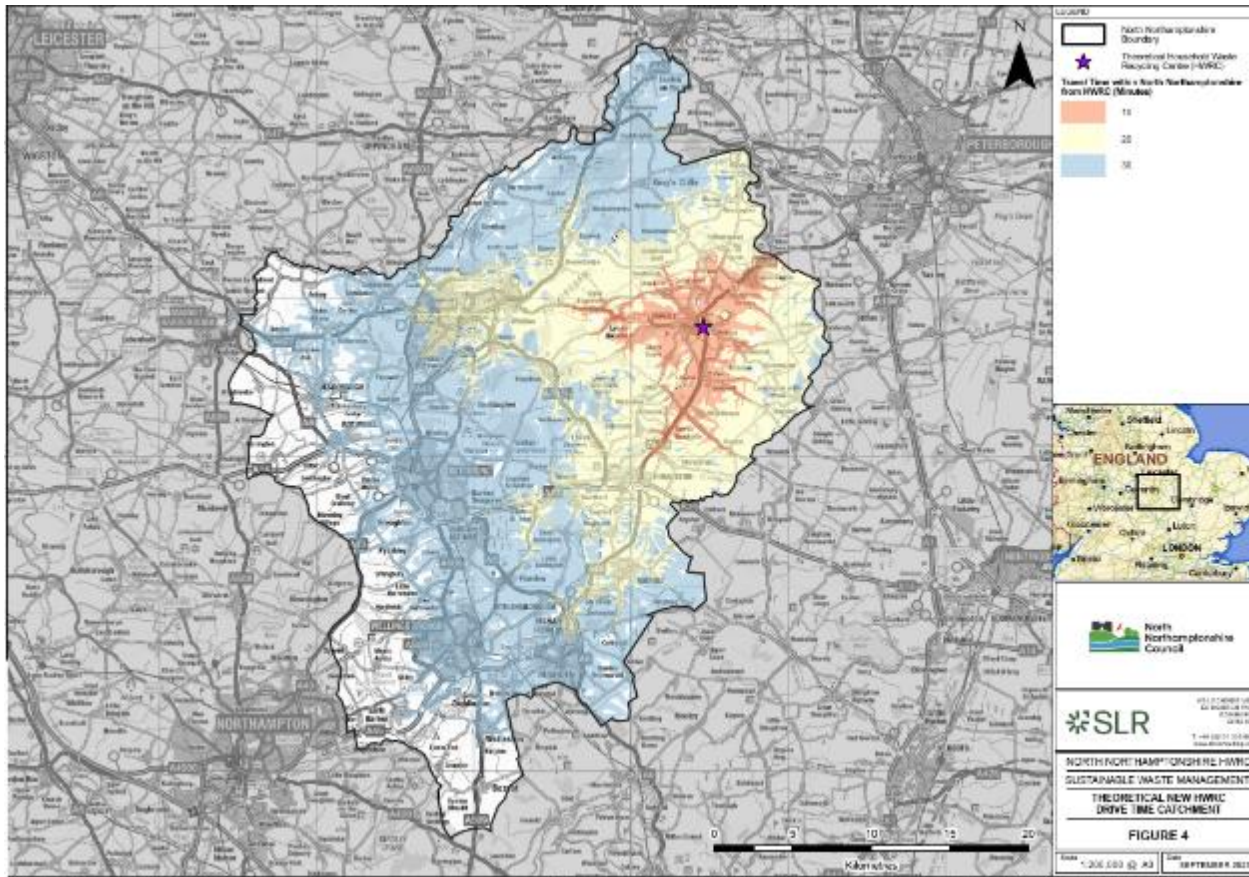




Table 8.13 New HWRC Site Drive Time Analysis







## Equality Screening Assessment

The Equality Screening Assessment form must be completed to evidence what impact the proposal may have on equality groups within our community or workforce. Any proposal that identifies a negative impact must have a full Equality Impact Assessment completed before the proposal progresses further.

### 1: Proposal

Page 727

| Requirement  | Detail  |
|--|---|
| Title of proposal  | Delivery of Household Waste Recycling Centres (HWRCs) from April 2025   |
| Type of proposal: new policy / change to policy / new service / change to service / removal of service / project / event/ budget | Service Procurement – as a follow on from current contractual arrangements to maintain provision of HWRCs.  |
| What is the objective of this proposal?  | Agree continued outsourcing of HWRC Operations and agree procurement of that service and any related contracts (such as leases) for 1 <sup>st</sup> April 2025. |
| Has there been/when will there be consultation on this proposal?<br>(List all the groups / communities, including dates)         | No, as no change from current operating model/service level anticipated at this time  |
| Did the consultation on this proposal highlight any positive or negative impact on protected groups? (If yes, give details)      | n/a   |

| Requirement  | Detail   |
|--|--|
| What processes are in place to monitor and review the impact of this proposal? | <p>We receive and review regular customer comments made through the NNC Customer Services Team and from our contractors who routinely administer a customer feedback form. The customer feedback form includes information on gender, age, ethnicity etc. Therefore we can monitor any negative equalities impacts and seek to address.</p> <p>We don't anticipate the service changing from what we have already, any prior issues and subsequent changes have already been addressed through the current contract.</p> <p>However, any matters that do arise as a result of this re-procurement shall be addressed through a further ESA which may then trigger an EQIA.</p> |
| Who will approve this proposal?<br>(Committee, CLT)                            | Executive – November 16 <sup>th</sup> 2023   |

## 2: Equality Consideration

In turn, consider each protected group to ensure we meet our legal obligations of the Equality Act (2010).

| Protected Groups   | General Equality Duty Considerations | Changes | Impact  |
|--|--------------------------------------|---------|---------|
| <b>Age</b><br>Different age groups that may be affected by the proposal in different ways.           | None                                 |         | Neutral |
| <b>Sex</b><br>Is one sex affected more than another or are they affected the same?                   | None                                 |         | Neutral |
| <b>Disability</b><br>It is likely to have an effect on a particular type of disability? Why?         | None                                 |         | Neutral |
| <b>Gender Reassignment</b><br>Will there be an impact on trans males and/or trans females?           | None                                 |         | Neutral |
| <b>Race</b><br>Are people from one ethnic group affected more than people from another ethnic group? | None                                 |         | Neutral |

| Protected Groups  | General Equality Duty Considerations | Changes | Impact  |
|---|--------------------------------------|---------|---------|
| <p><b>Sexual Orientation</b></p> <p>Are people of one sexual orientation affected differently to people of another sexual orientation?</p>                | None                                 |         | Neutral |
| <p><b>Marriage &amp; Civil Partnership</b></p> <p>Are people in a Marriage or Civil Partnership treated less favourably?</p>                              | None                                 |         | Neutral |
| <p><b>Pregnancy &amp; Maternity</b></p> <p>Are people who are pregnant, or have a baby of 6 months old or younger, effected by this proposal?</p>         | None                                 |         | Neutral |
| <p><b>Religion or Belief</b></p> <p>Does the proposal effect people differently depending on whether they have or do not have a religion or a belief?</p> | None                                 |         | Neutral |

| Protected Groups  | General Equality Duty Considerations   | Changes   | Impact   |
|---|--|---|--|
| <p><b>Health &amp; Wellbeing</b></p> <ol style="list-style-type: none"> <li>1. Health behaviours (E.g. diet, exercise, alcohol, smoking)</li> <li>2. Support (E.g. community cohesion, rural isolation)</li> <li>3. Socio economic (E.g. income, education).</li> <li>4. Environment (E.g. green spaces, fuel poverty, housing standards).</li> </ol> | <p>Potential loss of access to previously accessible sites now in neighbouring authority. The current provision, until 31<sup>st</sup> March 2025, is 9 sites across the County, accessible to all Northamptonshire (both North and West) residents. From 1<sup>st</sup> April 2025 North Northamptonshire Council will manage 4 household waste recycling centres. And West Northamptonshire Council will contract their own sites and may seek to only accept waste from residents of West Northamptonshire.</p> <p>Potentially NNC may need to change opening days on some sites to maintain accessibility to Trade services. However, HWRCs are principally for household waste and traders can pay to dispose of their waste at any other waste facility, so this may not be necessary.</p> <p>There may be opportunities for enhanced community engagement within the Social Value element of Contract award, which may include Reuse/Repair/Recycle opportunities to be explored. This would provide opportunities to aid community cohesion, and provide socio-economic and mental health benefits to local areas.</p> | <p>Result of Local Government Reform – not possible to mitigate as decision out of service hands. However, as NNC residents can't use other neighbouring authorities sites it's no difference to not being able to use Leicestershire or Rutland etc. – may need comms plan to clarify change if implemented.</p> <p>Ensure clear communications of any changes to ensure people can access in multiple formats (online-leaflet).</p> <p>Seek involvement or engagement with local community groups if opportunities arise to raise awareness and access to opportunities</p> | <p>Delete as appropriate.<br/>There can be more than one answer per protected group.</p> <p>Neutral</p> <p>Neutral</p> <p>Positive</p> |

### 3: Equality Impact

| Question   | Response   |
|--|--|
| What overall impact does the proposal have on the protected groups?<br>If a negative impact is identified anywhere in section 2, the response will be Negative Impact. | Neutral Impact   |
| Does an Equality Impact Assessment need to be completed?<br>(Yes, if any negative impact is found.)  | If yes, this Equality Screening Assessment must be adjoined to the Equality Impact Assessment. |
| Copy attached to relevant report?  | Yes  |
| Is this document going to be published with the relevant report?   | Yes  |

### 4: Ownership

| Question                       | Response                               |
|--------------------------------|--|
| Directorate                    | Place & Economy – Highways and Waste   |
| Service area                   | Waste Management                       |
| Lead officer's name            | Lesley Elkington                       |
| Lead officer's job title       | Business Support Manager (Waste)       |
| Lead officer's contact details | Lesley.elkington@northnorthants.gov.uk |
| Lead officer's signature       | <i>Lesley Elkington</i>                |
| Date completed                 | 02/10/23                               |

Completed forms must be sent to [Equalities@northnorthants.gov.uk](mailto:Equalities@northnorthants.gov.uk)



## EXECUTIVE 16<sup>th</sup> November 2023

|   |   |
|---|---|
| <b>Report Title</b>                     | <b>Kettering Library Roof Replacement Capital Project</b>   |
| <b>Executive Director Report Author</b> | Jane Bethea, Director of Public Health and Wellbeing<br><br>Kerry Purnell Assistant Director, Communities and Leisure |
| <b>Lead Member</b>                      | Cllr Helen Howell – Executive Member for Sport, Leisure, Culture and Tourism  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> | Paragraph 3   |

### List of Appendices

#### **Appendix A: GSS Architects Estimated Cost Plan (EXEMPT)**

#### **1. Purpose of Report**

---

- 1.1. This report details the work required and the rationale, the proposed methodology and estimated, high-level, worst-case scenario, costs to replace the 120-year-old Collyweston stone roof on Kettering library.
- 1.2. It seeks to add £6,807m to the Council's capital programme so that the work can be undertaken over the rest of this current year and the next two financial years.
- 1.3. It also seeks approval to enter into the required procurement activity to secure the installation of the scaffolding and canopy tent, the appointment of the professional team (Architects, Quantity Surveyors and Contract Administrators), ordering the Collyweston stone and then appointing the main contractors to complete the roof replacement.

## **2. Executive Summary**

---

- 2.1. Kettering Library roof is in parts over 120 years old. The library and attached Art Gallery are Grade II listed buildings and as the owner NNC has a duty to maintain and repair them. The library roof is made of Collyweston stone slate.
- 2.2. Both buildings are now connected to the new extension, and all make up Cornerstone, a £4.5m capital project inherited from the former Kettering Borough Council (KBC) and delivered by North Northamptonshire Council, utilising £3m of external funding from SEMLEP through the Government's Get Building Fund. There are funding outputs related to the SEMLEP investment which require Cornerstone to be open and functioning, for example related to the new Business and Intellectual Property Centre space located as part of the library.
- 2.3. The library roof has been in need of repair for some time. However, a survey undertaken by the former County Council in 2019, prior to the Cornerstone construction beginning, stated that it would need replacing within 10 years.
- 2.4. During the winter of 2022-23 the roof deteriorated rapidly, causing water ingress into the main library building and into some parts of the new Cornerstone extension, where the old roof meets the new.
- 2.5. A new condition survey of the roof has been obtained through heritage architects, which provides evidence that the roof needs to be completely replaced. The Collyweston stone needs to be replaced like for like, and given the nature of how it is constructed, it is recommended to be undertaken during dry conditions. This requires the whole building to be made watertight through a tent canopy, which in turn necessitates a complex scaffold being erected and retained in place throughout the duration of the roof replacement.
- 2.6. The proposed methodology for this project is both necessary, to balance our duties to keep a Listed Building in repair and to maintain a statutory library in Kettering town centre. It is a complex project and requires significant capital investment.

### 3. Recommendations

---

#### 3.1. It is recommended that the Executive:

- a) Recommend to Council the approval of the budget of £6,807,000 to be added to the Capital Programme to fulfil the Executive's longstanding commitment to replace the Kettering Library roof and to commit to repair the roof of the Art Gallery.
- b) Delegate authority to the Executive Member for Sport, Leisure, Culture and Tourism, in consultation with the Director of Public Health and the Director of Place and Economy, to procure the necessary works to replace the Kettering Library roof and undertake any actions required to deliver the project within the approved financial envelope

#### 3.2 Reasons for Recommendations

- The library building is Grade II listed and it is the responsibility of the Council as the owner to maintain it. Further, the Council has various statutory enforcement powers to require the owners of listed buildings to keep listed buildings in a good state of repair. It is therefore important that the Council demonstrates its preparedness to tackle the condition of listed buildings.
- If the building is not made watertight as soon as practicable there is a risk that further water ingress will compromise the structure of the building and cause damage to the internal fabric, library stock and equipment.
- To enable the Council to continue to deliver its full statutory library functions within Kettering town centre.
- Over the weekend 13<sup>th</sup>/14<sup>th</sup> October 2023 further heavy rain caused the ceiling to collapse in a section to the right of the side doors of the library. This resulted in the library having to close whilst urgent remedial works and a clear up are undertaken and assessment is made as to the safety risks in re-opening the library to staff and the public. The frequency and likelihood of this re-occurring increases whilst the building remains exposed to the elements with the roof in the condition it is in. Options are now having to be considered to relocate the library until the building is watertight.
- Cornerstone cannot open in its entirety until the building is watertight, due to water ingress into the new space on the ground floor, where the old roof meets the new. Inability to fully open Cornerstone compromises the Council's ability to comply with the funding agreement in place with SEMLEP and exposes the Council to a risk that some of this funding will be clawed-back. The Council submits twice yearly monitoring reports to SEMLEP and so they are aware of the current challenges and have been supportive to date but want to see Cornerstone fully open as soon as practicable.
- The Gallery has a revenue cost to the Council and the intention, should Cornerstone be open, is for the new spaces to generate an income that will offset some of these costs.
- Whilst Cornerstone remains closed the Gallery Collection is not accessible to the public.

### 3.3. Alternative Options Considered:

- **Not undertaking the work to replace the library roof**

This would result in the permanent closure of the library building and the need to permanently relocate it to another town centre location. Even if such a location, with the right footprint, could be found the cost of the relocation would be increased due to the need to connect any new space with the former County Council IT network, on which the library management systems operate.

Even if the library could be relocated the Council would still be left with a Grade II Listed Building in need of repair and it could prevent the opening of Cornerstone as originally intended. This would risk SEMLEP clawing back some or all of the funding committed to the Cornerstone development.

- **Not using Collyweston Slate**

This has been discussed at length with the Conservation Officer on more than one occasion and advice has also been sought from Historic England, as listed building consent would be required, and using an alternative slate on this roof is not an option.

- **Not tenting the building while the roof is replaced.**

Despite the cost being higher for the option to tent the building, it is the preferred option for the following reasons:

- It is the much less risky option in terms of NNC's control over the programme of activity and ability to mitigate unknown risks. The timeline for replacement without tenting is much more weather dependent.
- It protects the internal fabric of the building including those renovations already complete and the new extension.
- It protects the internal contents of the buildings.
- Without the tent, once the slates and felting are removed, even in sections, the timbers will be exposed, there will be a risk of further damage through increased water
- If the Council were to open Cornerstone without a tent, there is a risk of further leaks, if water ingress from the library roof worsens.
- Tenting will allow for Cornerstone to fully open sooner, if deemed safe to do so, and to start to attract an income to offset the annual revenue cost to the Council.
- Once tented, if there are unforeseen delays to the roof replacement phase of the project, these will not compromise the operation of the Library and Cornerstone as they will be protected.

## 4. Report Background

---

4.1. Kettering Library was constructed in 1904 using local materials in the original construction including red Sandstock bricks from Hemel Hempstead, Ketton stone from Edith Weston Quarries, and Collyweston stone slates to the pitched roofs.

4.2. The library building is connected to the Art Gallery and now the new extension, both of which make up Cornerstone, a £4.5m capital project

inherited from the former Kettering Borough Council (KBC) and delivered by North Northamptonshire Council, utilising £3m of external funding from SEMLEP through the Government's Get Building Fund.

- 4.3. The Library, Art Gallery and the nearby Kettering Museum are all Grade II listed, and the site is in a Conservation Area, so this will be taken into account with any alterations to the buildings.
- 4.4. The Cornerstone project aimed to revitalise and extend the physical assets and offer, to a creative and cultural anchor for North Northamptonshire; unifying the facilities, providing a blend of cultural amenity, community space and teaching facilities.
- 4.5. It is important to note that the library roof replacement was not in scope for the Cornerstone project at the outset when it was set up by Kettering Borough Council, as it did not meet the funding criteria. Although a condition survey of the library was undertaken by the former County Council in August 2019, prior to the Cornerstone project being progressed, at that time the survey reported that the requirement to replace the roof covering can be expected within the next 10 years.
- 4.6. Construction on Cornerstone was completed in autumn 2022 and was due to open to the public in February 2023. However, the condition of the library roof worsened over the winter of 2022-23. Water ingress, where the old roof meets the new, has caused internal damage to some of the new ground floor spaces meaning they cannot be used currently, and for a time, water ingress also affected the ability to connect electricals in the roof spaces, which impacted fire alarm systems.
- 4.7. A decision was taken in January 2023 to delay opening Cornerstone and to progress work on a design for scaffolding and tenting of the whole building, and for the remaining snagging issues to be resolved.
- 4.8. The snagging issues are largely resolved now, with the exception of the failure of the dehumidification unit in the Art store. The retainer is yet to be paid to the contractor, but it is anticipated the defects certification will be issued in the next few weeks.
- 4.9. The designs for the scaffolding and tent are complete, along with an indicative cost for them to be in place for a 2-year period.
- 4.10. GSS Architecture was appointed by the Council earlier in 2023 to conduct a refreshed condition survey of the roofs and associated building fabric of Kettering Library. The library roof is in poor condition and is suffering from several leaks, with the roof in many areas being almost 120 years old. There are several slipped slates and a number of intermediary repairs that have been conducted over the years have now failed. Scaffolding has also been installed to prevent slipping tiles falling onto the main library entrance.

- 4.11. The roofs of the original library buildings are covered in Collyweston stone slate, with asphalt flat roofs infilling in between. There were originally many roof lights lighting the interiors below, most of which have been either filled in or have suspended ceilings beneath, therefore they are not performing their original function of letting daylight into the building. The sloping verges are generally formed as Collyweston swept verges. The roof is of a complex design.
- 4.12. The west elevation of the library and Art Gallery are covered in Virginia Creeper that is covering the walls and windows and is now getting into the roof structure causing further damage. The recommendation of the architects is that the creeper is removed. In addition, there are a number of trees that are in close proximity to the library and require their branches to be removed to prevent damage to the existing roof. It is hoped that during detailed design that no further works to trees are required, but it cannot be guaranteed.

## **5. Issues and Choices**

---

- 5.1. Not replacing the roof would result in the permanent closure of the library building and the need to permanently relocate it to another town centre location. Even if such a location, with the right footprint and accessibility could be found, the cost of the relocation would be increased due to the need to connect any new space with the former County Council IT network, on which the Library Management Systems operate.
- 5.2. Even if the library could be relocated the Council would still be left with a Grade II Listed Building in need of repair. The leaking roof must be repaired as the Council is bound by legal requirements such as Listed Building legislation and, it is understood, that the original Carnegie funding agreement with the then Council for the initial construction of the library requires the Council to operate a library from it.
- 5.3. In addition, it could prevent the opening of Cornerstone as originally intended. Despite the current positive relationships with SEMLEP on this matter, it would risk SEMLEP clawing back some or all of the £3m funding committed to the Cornerstone development.
- 5.4. Like for like re-roofing does not technically require Planning consent. However, any alterations to the exterior of the building will require both Planning and Listed Building Consents. It is likely that some changes will be proposed, such as the recommended removal of the rooflights and the added insulation to flat roofs, and so consents will be needed. The change of roof covering of asphalt flat roofs, even without added insulation, may also require consents subject to discussion with the Conservation Officer and Historic England.
- 5.5. One option that has been considered on other similar projects is the use of replica/reproduction Collyweston slates or Cotswold stone slate. However, the local Conservation Officer has been resistant to this proposal, and it has not

been a viable option on recent projects in the area such as the Hind Hotel in Wellingborough.

- 5.6. However, because the Kettering Library roof does have a number of internal pitches which face onto a flat roof, consideration can be given to the potential acceptability of using any alternative materials to these pitches. If approved this could significantly reduce the amount of new slates required, with associated possible time and cost savings to the project. For all visible pitches the architect's recommendation is to strip and consolidate all the good original stone slate, make up new stone slates where needed, and re-lay. Any use of replica slate will be subject to Conservation Officer and Listed Building approval and following discussions with the Conservation Officer the most likely outcome will be for all Collyweston roofs to remain as such.
- 5.7. Along with GSS, possible suppliers who are able to supply Collyweston stone slates for a project of this size and who could also carry out these type of roof works, have been consulted.
- 5.8. As part of the recent Cornerstone project, bat presence was detected and is therefore likely to remain. As the previous survey was over two years old it has recently been repeated as it has to be conducted during the summer months of 2023. Evidence of common pipistrelles was found, and wildlife protection recommendations have been made with a Bat licence being required ahead of works commencing.
- 5.9. There is only one source of Collyweston slate, due to the number of slates required for this project, and this has a significant impact on timescales for the project as there is an estimated 11-month lead in time for the mining and delivery of all the slate. 20% of the required slate will need to be ordered up front in order to secure the excavation of the rest of the slate.
- 5.10. There has been discussion regarding whether a full scaffold and tent is needed for these works and the Council has already obtained a design for a full tent canopy option. The benefits of a canopy will be to reduce the water ingress and further damage this would do during the construction phase and accelerate the speed of installation of the new mortar bedded slates. The canopy option is more expensive, estimated at £500,000 to erect. The scaffolding would be required regardless of whether a tent is fitted or not. However, there would not be an automatic saving if a tent is not erected, as not using the canopy exposes the project to risks that will result in more costs.
- 5.11. This project will also involve installing a waterproof membrane which will sit under the re-laid slates. This membrane can be installed quickly as the roof is stripped in a phased manner and once installed the roof should be watertight. Regarding speed of installation of the stone slates, as the slates are laid on a mortar bed, this work cannot be conducted during inclement weather unless under a canopy, therefore the time on site will likely be extended from approximately eight months with the canopy to twelve months without. The time of year should also be considered, and winter avoided as low temperatures are not conducive to working with mortar. This will negatively impact the timescales if the decision is to progress without a canopy.

- 5.12. With a tent the risks related to inclement weather are mitigated. In addition, once the building is watertight, full operations within the building will be started or resumed, so long as it safe to do so.
- 5.13. It is expected that approximately 50% of existing slate will be salvaged.
- 5.14. The life of a Collyweston slate cannot be guaranteed but a well slated Collyweston roof will give a minimum of one hundred years life maybe close to two hundred if well maintained. New Collyweston slate will have a much longer life than reclaimed Collyweston slate, but the exact timescales cannot be known.
- 5.15. The project does not allow for the full replacement of the timber frame of the roof. The Roof Repair Report by GSS Architecture notes the existing timber structure is likely to require localised repairs, but the extent of this is unknown until the roof covering is removed. An allowance for repairs has been included within the cost estimate, but this is subject to change pending further surveys. If a full frame replacement was required, this would require a significant increase in the project cost.
- 5.16. To mitigate the risks a 20% contingency has been added into the £6.807m estimated costs.
- 5.17. It is recommended the project be undertaken in 2 phases:
- Phase 1: procure the slate, procure and install scaffolding and tent; appoint design team, undertake a measured survey to inform the design, progress design to RIBA Stage 4.
  - Phase 2: procurement of contractor and delivery of full roof replacement.
- 5.18. Phase 1 will also include any internal remedial redecoration required in any of the new Cornerstone spaces which has been affected by water damage. The cost of this work has been factored into the overall budget.
- 5.19. There are also some repairs required to the Art Gallery roof and these will be undertaken as part of this project.
- 5.20. The project is estimated to take 2 years in total once funding approval is secured. The installation of the scaffolding and tent is estimated at 6-9 months. The roof replacement is estimated at 8-12 months. The lead in time for the slate is 11 months.
- 5.21. A site compound is likely to be required as a large crane will need to be in situ throughout the installation of the tent. It is anticipated this will be situated at the front of the library building on the paved area on Sheep Street, although it is likely that road closures and or restrictions will be required.



## **6. Next Steps**

---

- 6.1. If the Executive approve the recommendations in this report, the report will be taken to the Council to approve the funding allocation.
- 6.2. If and when Council approval is obtained procurement will be progressed for Phase one as soon as practicable.

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

- 7.1.1. The project is to replace Kettering Library roof with like for like Collyweston stone slate.
- 7.1.2. An Initial Cost Estimate report has been undertaken by GSS Architecture which estimates the total value of this capital project at £6.807m this includes fees and 20% contingency.
- 7.1.3. Whilst external funding sources will be sought to support the cost of this project, the costs will be underwritten by borrowing.
- 7.1.4. The project will be managed by the Council's Capital Projects team who have a proven track record of delivering projects on budget and on time. An external client-side professional team, to include architects and quantity surveyors, will also be appointed.
- 7.1.5. The construction market is experiencing considerable volatility currently, and we are recommending mitigating the impact of this volatility on tender prices by including 20% client-side contingency on all of this Capital Project.
- 7.1.6. A new condition survey and technical report have been commissioned from specialist architects which demonstrate that this project is necessary to ensure that the library roof is replaced in accordance with listed building and Conservation requirements in the most efficient and timely manner to allow the library to remain on its existing site and for Cornerstone to fully open.

### **7.2. Legal and Governance**

- 7.2.1. The contracts will be procured and awarded in accordance with all legal requirements, including relevant legislation and the Council's Contract Procedure Rules.
- 7.2.2. A member of the Council's in-house Legal team will be an advisor throughout the process and up to execution of any resulting contracts.

7.2.3. All reports relating to a procurement which require legal review and/or comment to be provided to the Legal officer with conduct of the matter to which the report relates.

7.2.4. Any monies received from s106 agreements above will be utilised in accordance with the restrictions named within the respective agreements.

### 7.3. **Relevant Policies and Plans**

7.3.1. The North Northamptonshire Council's Corporate plan adopted in 2021 has key commitments which are key to this project. These include:

- Active, fulfilled lives: - supporting people to live healthier more active lives. Libraries proactively contribute to the health and wellbeing of communities.
- Connected Communities: - respect, empower and engage our Communities which libraries do as a critical touch point of our residents in local communities.

[Corporate plan | North Northamptonshire Council  
\(northnorthants.gov.uk\)](https://www.northnorthants.gov.uk/corporate-plan)

### 7.4. **Risk**

7.4.1. **Collyweston Stone Slate.** The area of re-slating (due to outside possibility of using replicas to some pitches) and percentage of slate that will be able to be kept is unknown. There is an approximate but not definitive guide on the long lead-in period for this material.

7.4.2. **Listed Building Consent.** Planning determination periods are an unknown factor and although we do not expect this to be contentious, timescales for determination are often subject to prolongation.

7.4.3. **Cost.** The project costs are currently unknown and the potential variation in the timescales involved means that inflation could have a significant impact. It should be noted therefore that the cost estimate report from GSS, subject to this business case, applies several assumptions and exclusions, as without a full RIBA 4 design, a detailed and robust cost report cannot be produced at this stage.

7.4.4. To mitigate these risks a 20% contingency has been added into the costs, alongside an additional period of 52 weeks for scaffolding and tent hire. This is because these are required to be erected at the earliest opportunity to make the building watertight (a 6–9-month installation) and the roof replacement cannot actually start until the slate has been delivered, with an estimated 11-month delivery timeframe. The roof replacement, once underway, is estimated to take 12 months.

- 7.4.5. **Water Ingress.** The continued water ingress presents a risk to the condition of the internal building fabric and the books, etc., stored in the library. The risks associated with this increase at all times the building is not watertight.
- 7.4.6. **Conducting the work without a scaffold canopy / tent.** Although the tent would be a more expensive option, it will help mitigate the risk of water ingress and programme slippage during the re-roofing works.
- 7.4.7. **Reputational risk.** The recent temporary closure of the library and the inability to open Cornerstone have provoked negative media interest and a series of complaints to the Council from customers. Positive steps towards delivering the replacement roof will mitigate the reputational risk to the Council.
- 7.4.8. **SEMLEP funding.** If the roof is not replaced, the Council would be left with a Grade II Listed Building in need of repair, and it could prevent the opening of Cornerstone as originally intended. This would risk SEMLEP clawing back some or all of the funding committed to the Cornerstone development. The Council submits twice yearly monitoring reports to SEMLEP and are aware of the current challenges and have been supportive to date but want to see Cornerstone fully open as soon as practicable.
- 7.4.9. **Trees:** It is hoped that during detailed design no further works to trees are required but it cannot be guaranteed,

## 7.5. **Consultation**

- 7.5.1. Heritage construction architects, NNC's Conservation Officer and Collyweston roof experts have been consulted to inform this report.

## 7.6. **Consideration by Executive Advisory Panel**

- 7.6.1. This report has not been considered by an EAP as is not policy or strategy related.

## 7.7. **Consideration by Scrutiny**

- 7.7.1. Place and Economy Scrutiny Panel considered the Cornerstone project in August where the library roof was also discussed. The panel were very keen to see the roof replacement progressed. This item is eligible to be reviewed by the Place and Environment Scrutiny Committee as part of their work plan.

## 7.8. **Equality Implications**

- 7.8.1. An equality impact assessment is to be undertaken as part of the procurement process.

## **7.9. Climate and Environment Impact**

7.9.1. The Council, having declared a climate change emergency in June 2021, is committed to reducing its climate impact both within its own Council buildings and in working with businesses and the wider community to achieve net zero energy emissions.

7.9.2. By virtue of the contract arrangements the Council can monitor the impacts of managing the contract to ensure that it is ethically and environmentally managed and aligns with the Council's strategy in terms of Climate Change.

## **7.10. Community Impact**

7.10.1. The Public Services (Social Value) Act (2013) transformed the way public bodies buy services and the 2021 National Procurement Policy Statement identify social value as being a key Government priority. Councils are required to consider how the services they procure might improve the social and environmental wellbeing of their local area. This has been included as a requirement of the Frameworks e.g., the PBO requirement to securing funding from the supplier for social value projects.

7.10.2. The Library Service is able to provide the council's statutory duty to provide a comprehensive and efficient public library service in accordance with the Public Libraries and Museums Act of 1964, through well maintained buildings

- Libraries Connected and has developed a set of Universal Libraries Offers, which we follow, giving guidance as to how public libraries can:
  - connect communities
  - improve prosperity and wellbeing
  - promote equality through learning
  - enable digital access and improve digital literacy
  - enable everyone to reach their full potential through literacy and cultural activity
- The Library service offers opportunities and support at every stage of life and is a trusted source of information, providing learning and skills, essential digital resources, a place to meet and socialise and volunteering opportunities.
- The Library Service work with local partners and volunteers in Kettering to enable us to fulfil these objectives.
- Replacing the roof in the proposed way will allow the library service to continue in Kettering, enabling Cornerstone to open
- There has long been ongoing support and recognition of the need to effectively invest capital to enhance, protect and future proof the prime heritage assets for existing and future generations of North Northamptonshire. The investment has wider benefits of promoting social inclusion by improving connectivity and offering improved

community access to a wider cultural, heritage and learning offer, which the public may not have previously engaged with.

- Providing a comprehensive and efficient Library Service, accessible to all residents, as listed above
- Health and wellbeing benefits from provision of an accessible community spaces enabling meetings and activities to take place.
- Securing the library space will also enable the use of the space as a community hub.

## 7.11. **Crime and Disorder Impact**

7.11.1 None identified

## **8. Background Papers**

---

8.1 None

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank



## EXECUTIVE 16<sup>th</sup> November 2023

|                      |  |
|----------------------|--|
| <b>Report Title</b>  | <b>Corporate Property Leasehold Policy</b>                           |
| <b>Report Author</b> | Graeme Kane – Executive Director Place & Economy (Interim)           |
| <b>Lead Member</b>   | Cllr Matthew Binley – Executive Member for Highways, Travel & Assets |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

#### **Appendix A – Corporate Property Leasehold Policy**

#### **1. Purpose of Report**

---

- 1.1 The Chief Responsible Officer, confirmed as the Executive Director, Place and Economy, is responsible for ensuring that procedures are put in place detailing arrangements for the management of property and land assets owned by the Council.
- 1.2 This includes producing an asset strategy, a policy and processes for governance purposes and ensuring the Council maintains accurate records of its land holdings.
- 1.3 This report introduces the Corporate Property Leasehold Policy; a policy and process that supports the constitutional delegations by providing a co-ordinated approach to internal review and approval of leasehold terms.
- 1.4 The Corporate Property Leasehold Policy forms part of a suite of asset management policies, forming the Council's asset strategy.

## 2. Executive Summary

---

- 2.1 The Council holds an extensive portfolio of land and buildings which it leases to third parties and itself leases from third parties.
- 2.2 This portfolio is held for a variety of different functions, including service delivery, community purposes, and investment. It is vital that the portfolio is managed to best effect in supporting the Council's strategic objectives, whilst satisfying best consideration duties.
- 2.3 Following an Asset Management audit, the following action was noted by the auditor as a means of managing such risk associated with leasehold transactions: *To protect the Council and support the Service Areas, the policies should outline how the Asset Management Team need to be involved in every potential agreement made in respect of leased assets or other tenancy agreements, for example, mandatory attendance of the Service Areas to an Asset Management working group, prior to these agreements being signed off by the delegation as outlined in the Constitution.*
- 2.4 The Corporate Property Leasehold Policy and process presented to Executive in **Appendix A** supports delivery of this recommendation by establishing a clear process to support existing governance arrangements relating to leasehold transactions. It also confirms that all leases are negotiated through the Asset Management team, who will provide technical advice, to support informed decision making. This will ensure all lease negotiations comply with statutory requirements, reflect best consideration, and are on terms that deliver the Council's Corporate Plan.

## 3. Recommendations

---

- 3.1 It is recommended that the Executive approve the Corporate Property Leasehold Policy at **Appendix A** for adoption.
- 3.2 Reasons for Recommendations:
- i) The Council has fiduciary responsibilities to ensure all leasehold agreements it enters represent value for money. The Corporate Property Leasehold Policy supports this outcome.
  - ii) Progressing leasehold transactions in a co-ordinated way will contribute to the Corporate Plan and the commitment to be carbon neutral by 2030.
  - iii) The Corporate Property Leasehold Policy supports a timely and professional process, which will help manage costs and assist the Council to achieve income targets from its commercial estate.
  - iv) The Policy supports centralised current record keeping; a requirement of the constitution.

- 3.3 Alternative Options Considered: The Council could choose not to adopt a co-ordinated leasehold policy, but this would lead to uncertainty and increased risks of agreements being entered into without full consideration.

#### **4. Report Background**

---

- 4.1 The way the Council manages its land/property assets can have a significant impact both on the quality of services delivered to the public and the local environment.
- 4.2 Effective asset management is essential in bringing 'agility' to land and property assets so that the delivery of the Council's goals and objectives are realised in a sustainable manner, at the right time and on budget.
- 4.3 The Council holds detailed information about its property portfolio on its asset register, which includes leasehold information. This information is required to:
- Provide data for the annual publication of the property and land register as required in the Transparency Code.
  - Provide accurate information to the Council's valuers for annual review as part of the financial code for valuing the Council's estate.
  - For the asset management team to review and analyse the portfolio for alternative uses and make recommendations to the Council.

#### **5. Issues and Choices**

---

- 5.1 The Council is required to have detailed arrangements in place for property and land management. The constitution delegates broad authority in relation to entering into leasehold arrangements. Following an internal audit, it was recommended that in order to manage the risks associated with leasing property to third parties or taking on leasehold interests, suitable policy processes are implemented to ensure a consistent process is employed for all transactions.
- 5.2 Therefore, the process detailed in this policy aims to support existing governance arrangements, but also ensure that all leases are negotiated through the Asset Management team, who will provide technical advice, to support informed decision making. This will ensure all lease negotiations comply with statutory requirements, reflect best consideration, and are on terms that deliver the Council's Corporate Plan
- 5.3 **Appendix A** of the policy document provides greater detail on the transactions in scope of the policy and decision-making process.

#### **6. Next Steps**

---

- 6.1 Implement the Corporate Property Leasehold Policy, including engagement with service areas to ensure timely engagement on relevant transactions.

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

- 7.1.1 Leasehold agreements can have significant financial implications, including rental payments, insurance liabilities, service charge management, and dilapidation liabilities arising at the end of the lease.
- 7.1.2 Given the term that leases run for, and the financial commitment lease contracts can place on the Council, it is vital that any agreements entered into have a full understanding of the liability and financial implications before being agreed.
- 7.1.3 The Council has a significant leasehold investment portfolio, bringing in some £13.3m in rental income each year. This policy supports its timely and effective management.

### **7.2. Legal and Governance**

- 7.2.1. Legislation regulating to leasehold transactions requires a Council to obtain best consideration that can reasonably be obtainable.
- 7.2.2. The Council's financial procedure rules require leasehold opportunities to be marketed on the open market unless there are exceptional circumstance.

### **7.3. Relevant Policies and Plans**

- 7.3.1. These proposals will assist the Council in delivery of its fiduciary responsibilities and assist the Council in meeting its commitments in the Corporate Plan, in particular providing Modern Public Services that are value for money.

### **7.4. Risk**

- 7.4.1. The recommendations above ensure the Council mitigates the risks associated with leasehold transactions.
- 7.4.2. A marketing campaign for all relevant sites provides transparency and gives opportunity for the wider market to tender. This mitigates the risks of challenge.

### **7.5. Consultation**

- 7.5.1. The policy outlines consultation undertaken with the relevant Executive Member on progress and completion of lettings on a periodic basis, with such information made available to Ward Members as required, noting commercially sensitive information cannot be released.
- 7.5.2 Where a leasehold transaction may cause significant community impact, views of Ward Councillors can be sought in order to support the Council's objectives for the property or land.

## **7.6. Consideration by Executive Advisory Panel**

7.6.1. The meeting of the Prosperous Communities Executive Advisory Panel on 11<sup>th</sup> May 2023 considered leasehold risks and considerations for the Council's estate, informing the development of the policy.

## **7.7. Consideration by Scrutiny**

7.7.1. This report is eligible for call in by the Place and Environment Scrutiny Committee as part of their work programme.

7.7.2. The Asset Rationalisation and Use Scrutiny Panel considered the draft policy, and their feedback has been incorporated into the policy.

## **7.8. Equality Implications**

7.8.1. An Equality Screening Assessment has been completed and confirms there are no negative impacts on one or more equality groups.

## **7.9. Climate and Environment Impact**

7.9.3. As part of the Asset review process, consideration as to the sustainability of the asset will be included, in particular whether retaining the asset can support the Council's climate change objectives and carbon reduction target.

7.9.3. Leasehold transactions are required to achieve minimum levels of energy performance, with opportunities to invest in energy saving technology as part of maintaining the asset.

## **7.10. Community Impact**

7.10.1. This proposal has no direct community impact. The proposed policy works in tandem with the Council's Community Asset Transfer policy, which seeks to provide opportunities for community groups to forward expressions of interest in Council assets.

## **7.11. Crime and Disorder Impact**

7.11.1. There are no direct crime and disorder impacts arising from this report.

## **8. Background Papers**

---

8.1. There are no background papers to this report.

This page is intentionally left blank



# Corporate Property Leasehold Policy

16<sup>th</sup> November 2023 Version 1.

[www.northnorthants.gov.uk](http://www.northnorthants.gov.uk)

# Document Version Control

Author (Post holder title): Assistant Director Assets & Environment

Type of document: Policy

Version Number: 1

Document File Name: NNC Corporate Property Leasehold Policy

Issue date: November 2023

Approval date and by who (CMT / committee): Executive 16<sup>th</sup> November 2023

Document held by (name/section): Asset Management

For internal publication only or external: Internet and Intranet

Document stored on Council website or Intranet: Council Website

Next review date: As required.

## Change History

| Issue | Date | Comments |
|-------|------|----------|
|       |      |          |
|       |      |          |
|       |      |          |

NB: Draft versions 0.1 - final published versions 1.0

## Consultees

| Internal                                   | External |
|--|----------|
| CLT  | N/A      |
| Asset Rationalisation & Use Scrutiny Panel |          |
|  |          |
|  |          |

## Distribution List

| Internal | External |
|----------|----------|
| CLN      |          |
|          |          |
|          |          |
|          |          |

## Links to other documents

| Document | Link |
|----------|------|
|          |      |
|          |      |
|          |      |
|          |      |



# Contents

| Section                                 | Page |
|---|------|
| 1.0 Introduction/foreword               | 3    |
| 2.0 Scope                               | 3    |
| 3.0 Policy outcomes                     | 4    |
| 4.0 Corporate Property Leasehold Policy | 4    |
| 5.0 Next steps                          | 8    |

## 1.0 Introduction / foreword

1.1 This policy applies to the leasehold management for corporate property owned or leased by North Northamptonshire Council.

1.2 It sets out the procedures and processes that the Council must follow to ensure there is adequate governance to mitigate risks associated with leasing property it owns to third parties or taking on leasehold interests. Following an Asset Management audit, the following action was noted by the auditor as a means of managing such risk:

*To protect the Council and support the Service Areas, the policies should outline how the Asset Management Team need to be involved in every potential agreement made in respect of leased assets or other tenancy agreements, for example, mandatory attendance of the Service Areas to an Asset Management working group, prior to these agreements being signed off by the delegation as outlined in the Constitution.*

1.3 As such, the process detailed in this policy aims to support existing governance arrangements, but also ensure that all leases are negotiated through the Asset Management team, who will provide technical advice, to support informed decision making. This will ensure all lease negotiations comply with statutory requirements, reflect best consideration, and are on terms that deliver the Council's Corporate Plan.

1.4 The Asset Management team are required to hold a land and property asset register, which includes maintaining a list of current lettings. This information is used by valuers to undertake the annual asset valuations, which in turn forms part of the annual accounting policy. Accordingly, it is critical all leasehold interests are managed and recorded centrally.

1.5 This policy forms a suite of asset management policies including the Community Asset Transfer Policy and the Asset Disposal Policy, which will provide a framework for the Council's Asset Strategy and support the Council in transitioning to a Corporate Landlord model.

## 2.0 Scope

2.1 This policy applies to all land and buildings within the Council General Fund ownership, which covers the following criteria outlined below.

2.1.1 All service area property requirements including:

- Sports and wellbeing - Community Halls, Public Opens spaces, Leisure and Sports Centres, pocket parks, libraries.
- Civic and Ceremonial - civic halls, registrars, memorials.

- Non-Housing Revenue Account Residential accommodation - traveller sites held by the general fund.
- Social Care - accommodation for the Northamptonshire Children's Trust and Adult Social Care.
- Economic development and regeneration projects - business centres, build leases.
- Infrastructure – unadopted roads, paths.
- Operational premises – depots, recycling centres.
- Commercial units – to earn income to support the finances of the Council

2.1.2 All lease lengths, from a short licence to occupy Council land, to long leaseholds of many years.

2.1.3 All service projects that include funding and service level agreements, which involve Council owned property being controlled by and in exclusive possession of a third party, or the Council taking on additional land & buildings via a leasehold interest.

2.1.4 All types of legal interests in land including periodic tenancies, leases, licences, easements, wayleaves, conditional contracts (e.g., agreements to lease).

2.2 This policy does not apply to:

- Ad hoc hiring of premises or land where exclusive possession is not granted
- Land and Buildings forming the Housing Revenue Account e.g. Social housing, and estates paths associated with a Housing Estate.

### **3.0 Policy outcomes**

3.1 The outcome of this policy is to ensure that there is a consistent, transparent and coordinated approach to lease negotiations, processed by the Asset Management team, who will lead lease negotiations and advise the Service Area on the best terms for each lease to achieve their aims.

3.2 The Lettings Policy will also ensure that the Council follows due process in relation to achieving best consideration for its assets, as required under Section 123 of the Local Government Act 1972 and is cognisant of the risks associated with lease transactions before committing to them formally.

### **4.0 Corporate Property Leasehold Policy**

4.1 The Council owns a large portfolio of property which is currently managed by different Services, although the Council is working towards a corporate landlord model. Much of this land and property is used under formal agreements, such as leases, licences, wayleaves, etc., by third parties. There are also instances where the Council leases in third party owned property, for service delivery.

4.2 These formal agreements provide clarity around responsibilities, and some have statutory protections to protect the tenant and landlord interests e.g., rights to renewal under the Landlord & Tenant Act 1954. The terms of lease agreements have evolved over many years, being refined by case law, the negotiation strengths of the parties involved and the economic conditions at the time of the grant of the lease.

4.3 Failure by either party to comply with the terms of the agreement may result in legal action or significant financial cost. Therefore, it is crucial the Council does not enter into lease or license agreements without appropriate due diligence checks and professional advice.

4.4 The leases/licence agreements the Council enters into fall into three categories:

- Agreement with a commercial or non-commercial interest or group for the purpose of supporting a council service function or furthering a council interest, including revenue generation.
- Agreement for a property that the council holds to fulfil its strategic objectives or service needs.
- Agreement for purposes other than for those that satisfy a council function or further a council interest, provided they do not interfere with any other council functions, e.g., telecommunications facility, unused right of way, temporary occupation of a surplus property etc.

#### 4.5 Asset Management Team

4.5.1 The estates surveyors in the Asset Management Team will lead on agreements for all property transactions giving rise to an interest in land as outlined in the scope of this document at section 2.0. The team will:

- Ensure that any lease/licence agreement entered into meets service requirements and customers' needs
- Support the service areas that retain ongoing responsibilities with advice on lease terms
- Monitor the local property market and relevant external influences so that commercial lettings reflect the optimum value and increase revenue to the council
- Hold an accurate and up to date record of all lease and licence agreements
- Manage key trigger dates such as lease terminations, rent reviews, break notices to mitigate risks and optimise the value of the estate.

#### 4.6 External Advice

4.6.1 At times, the Asset Management team may procure advice through external RICS (Royal Institution of Chartered Surveyors) regulated specialist firms. This may be because the letting is specialised and there is not sufficient expertise in-house, it may be exceptionally complex as part of a wider Council project and/or it may be of high value.

4.6.2 In consultation with the Service Area, the Asset Management team will document the fee instruction and lead on procurement of these services. These instances may incur a fee to be charged to the Service as the estates management budgets only provide for routine estates management. Services will need to take these costs into account when planning property and land projects. Early consultation with the Asset Management team is recommended.

#### 4.7 Selecting Tenants

4.7.1 The Asset Management team will prepare the marketing of available opportunities. This will ensure that the right agency route is identified, the marketing material and all relevant information is collated for prospective tenants to review and that the marketing process and period supports the Council's obligations under the laws surrounding best consideration.

4.7.2 As a guide, several factors are reviewed when selecting tenants and these factors are weighted depending on the reason for the letting. These include, but are not limited to:

- Ability to satisfy statutory best consideration requirements
- Economic impact
- Community engagement
- Environmental impact
- Job creation
- Commercial viability
- Operational risk
- Financial acceptability
- Ability to set up a community management committee

- 4.7.3 In all transactions, the Council will undertake appropriate due diligence arrangements in relation to confirming the identity of the party, anti-money laundering measures, appropriate credit references. The Council will not enter into lease with a party where an existing debt exists, or the individual is an employee.
- 4.7.4 The marketing will confirm that applicants are required to submit a bid for the property which will be reviewed against the criteria listed above, plus any specific criteria relating to the property under consideration. Tenant selection will be based upon the purpose for which the property is held and a combination of the above factors relevant to the letting in question.
- 4.8 The lettings process
- 4.8.1 The estates surveyors within the Asset Management team will enter into negotiations with prospective tenants and service areas with the aim of reaching an agreed set of Heads of Terms, which will form the basis for the formal lease agreement.
- 4.8.2 All Heads of Terms will be forwarded to the Commercial or Asset Manager, and the Service lead, for initial consideration and comment. Final Heads of Terms must be authorised by the Assistant Director of Assets and Environment, who may delegate levels of authority to the Assets Management team.
- 4.8.3 New leases will reflect market values and be supported with comparable evidence of similar transactions for transparency purposes.
- 4.8.4 In exceptional circumstances, and following the financial procedure rules, community or social value may be considered as a full or partial abatement of rent where the use of the property supports the Council's aims and objectives.
- 4.8.5 Maintenance and insurance responsibilities will be made clear within agreements. The Council is unlikely to enter into leases which increase the Council's maintenance liabilities, and any requests that increase budget costs will need to be authorised by the relevant finance officer.
- 4.8.6 Service leads will be kept informed of progress as agreements progress.
- 4.9 Heads of Terms
- 4.9.1 Heads of Terms set out the main elements between both parties and are agreed prior to a lease being produced and entered. The Council has standard templates for this function and the Asset Management team will ensure that all communication with third parties is legally caveated to protect the Council's interests. It is vital no other officers engage third parties in negotiations of lease terms, to avoid inadvertently committing the Council to a course of action or waive a right the Council has.
- 4.9.2 North Northamptonshire Council Heads of Terms will include:
- Agreement type – lease, licence, wayleave, easement, periodic tenancy.
  - Permitted use of the land and property.
  - Term - how long the agreement runs for.
  - Rent - assessed to reflect the market rent for the property based on comparable evidence of similar properties.
  - Rent Review - usually set at a three to five-year interval, assessed on the basis appropriate to the agreement e.g. market rent or inflation index.
  - Rent deposit – where appropriate an amount held by the Landlord as security against non-payment of rent. The amount requested will reflect the risk posed by the transaction and bargaining position of the parties.
  - Maintenance - all new leases should seek to limit repairing and maintenance obligations on the Council. In the case of lettings of the Commercial estate, these are typically on a full repairing basis (or effective full repairing via a service charge) with the tenant being

responsible for all repairs; which is reflected in the rental terms. Shorter agreements, or those to community organisations are likely to have reduced obligations on the tenant, such as internal only repair obligations. The terms will vary though depending on the length of the term granted and the circumstance of the transaction. Any requests for the Council to retain liability will be reviewed by the Asset Management team with guidance provided on due process for these requests.

- Insurance – The Council will insure its buildings and recharge the cost to the tenant. Public liability insurance to a minimum indemnity level of £5 million will also usually be a requirement of the tenant.
- Business Tenancies – confirmation of whether the contract falls within the remit of a protected business tenancy under the Landlord and Tenant Act 1954.
- End of Lease Procedures - including responsibility for dilapidations. All new agreements will set out what the expectations are upon both parties at the end of the term

#### 4.10. Leasehold Management

4.10.1 Once the lease is formally agreed it is important the terms of the lease are managed proactively to protect the Council's interest. A particular focus will be held on lease events that require formal action by the Council; where such events are governed by statute and require action within set timeframes. Such matters include:

- Lease Renewal
- Rent reviews
- Requests to assign the lease to another party
- Requests to alter the premises
- Service Charge budget and reconciliation
- Rent deposit management
- Rent payment, arrears recovery and forfeiture. Such processes will follow the Council's Income Collection policy, with thresholds for recovery action approved by the Assistant Director Assets & Environment.
- Maintenance requirements and dilapidations.
- All such matters will be referred to the Asset Management team to lead and manage in consultation with the relevant Service Area.

#### 4.11 Management Agreements

4.11.1 Management agreements provide a contractual means for the Council to commission activities via third parties, typically in return for a grant or concession payment. Such contracts include performance agreements, concession agreements, service level agreement and events management. Examples of such contracts include the operation of community services or catering contracts.

4.11.2 Where such an arrangement involves all or part of a council owned asset being operated by a third party with exclusive possession, a lease agreement must be put in place to govern the occupancy. Engagement with the Asset Management team should be undertaken to ascertain the requirement for a lease prior to any procurement exercise or discussion with third parties.

#### 4.12 Governance

4.12.1 The authority for the granting and/or modifying leases, easements, licenses and wayleaves of, in or above buildings or land is found in the Council's constitution.

4.12.2 This policy supports the existing governance arrangements and authorisers of delegated decisions will be required to follow the process in this policy before they authorise a leasehold transaction.

4.12.3 All Heads of Terms must be authorised by the Assistant Director of Assets and Environment, who may delegate levels of authority to the Assets Management team.

- 4.12.4 Once the Delegated Decision is approved by the relevant Executive Member or Officer, the Asset Management team will instruct Legal Services. Instructions on property transactions received directly from Service Areas should not be accepted.
- 4.12.5 Given the volume of transactions processed across the Council's estate, individual Ward Councillor consultation on each letting is not feasible nor possible within existing resources. However, the Asset Management Team will brief the relevant Executive Member on progress and completion of lettings on a periodic basis, with such information made available to Ward Members as required, noting commercially sensitive information cannot be released.
- 4.12.6 In circumstances where a leasehold transaction may cause significant community impact, views of Ward Councillors can be sought in order to support the Council's objectives for the property or land.

## **5.0 Next steps**

- 5.1 Establish internal procedures to ensure leasehold transactions follow the above policy.
- 5.2 Publish the Corporate Property Leasehold Policy and share with appropriate stakeholders.

## EXECUTIVE 16<sup>th</sup> November 2023

|                      |  |
|----------------------|--|
| <b>Report Title</b>  | <b>Proposal to Relocate Wilby CE VA Primary School to the Glenvale Park Development</b>  |
| <b>Report Author</b> | David Watts, Executive Director of Adults, Health Partnerships & Housing (DASS) & Children's Services (Interim DCS)<br><br>Jo Hutchinson, Head of School Effectiveness |
| <b>Lead Member</b>   | Cllr Scott Edwards – Executive Member for Children, Families, Education and Skills   |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

- Appendix A** – Equality Screening Assessment (ESA)
- Appendix B** – Equality Impact Assessment (EqIA)
- Appendix C** – Frequently Asked Questions (FAQs)
- Appendix D** – Copy of Formal Consultation
- Appendix E** – Executive Report 8<sup>th</sup> June 2023
- Appendix F** – Public Consultation Analysis Report
- Appendix G** – Public Consultation Appendix Analysis Report

### **1. Purpose of Report**

---

- 1.1. To inform Executive of the outcome of the expression of interest, interview and selection process.
- 1.2. To inform the Executive of the outcome of the formal public consultation following the interview panel's recommendation.
- 1.3. To request that Executive approve the relocation of Wilby CE VA Primary School.

## **2. Executive Summary**

---

- 2.1. The Glenvale Park site is in Wellingborough and once complete, there will be circa 3,000 homes. As part of the infrastructure and Section 106 (S106) proposals for the Sustainable Urban Extension (SUE), a 2-form entry, 60 places per year group, primary school was proposed to meet increased demand and serve the local community.
- 2.2. As part of the annual strategic Pupil Place Planning exercise undertaken in January 2023, it became clear that due to demographic changes, there would be insufficient demand to support the school opening until September 2025 or beyond.
- 2.3. Based on this position, work was undertaken to assess the options for the new school to ensure that the local community has access to sufficient school places. Local primary schools were invited to express their interest in relocating to the brand-new school building at the Glenvale Park site.
- 2.4. As part of the expressions of interest application process there was a requirement for the applicants to clearly set out how any move would support the existing school community as well as those living in the new Glenvale Park development.
- 2.5. Two expressions of interest were received. A robust interview process took place lead by a panel of representatives.
- 2.6. A formal 30-day public consultation was undertaken in September 2023, following the panel's recommendation that Wilby CE VA Primary should be the school that relocates to the Glenvale Site.

## **3. Recommendations**

---

- 3.1. Having regard to the formal consultation outcomes, it is recommended that the Executive:
  - i) Approve the relocation of Wilby CEVA Primary School to the Glenvale Park site
  - ii) Approve the continuation of the statutory process relating to the transfer of a school to another site in line with the Department for Education (DfE) guidance 'Making a Significant Change to a Maintained School.
- 3.2. Reasons for Recommendations:
  - To support children and young people and their families to access high quality sustainable education facilities that enable the achievement of the best outcomes.
  - To progress the relocation of the school in accordance with legislative requirements and Department for Education (DfE) statutory guidance.



- To ensure the delivery of sufficient suitable school places that meet the needs of the community now and in the future.
- To make effective and efficient use of the education estate to meet the needs of all pupils.

### 3.3 Alternative Options Considered:

3.3.1 Alternative options were considered in section 5 of the 'Primary Education Provision at the Glenvale Park Development Wellingborough North' paper presented to Executive on 8<sup>th</sup> June 2023.

3.3.2 The options were shared along with accompanying risks and advantages. A summary of the options that were outlined in the previous paper to Executive were:

- Option 1: Mothball the school build until demand for places increases
- Option 2: Repurpose the school building to meet an existing educational need
- Option 3: Relocate a local school into the newly built school at the Glenvale Park Development

3.3.3 The preference was to progress Option 3.

3.3.4 This preference was approved by the Executive on 8<sup>th</sup> June 2023. Colleagues leading on the project then progressed to the initial stages of the relocation process.

## **4. Report Background**

---

4.1 The reasons for the proposed relocation and subsequent expression of interest process were considered by the Executive on Thursday 8<sup>th</sup> June 2023.

4.2 The relocation proposal was presented to the Executive following a place planning review of the existing demand for school places within Wellingborough, along with consideration of the progress of each housing development in terms of housing completions. The review determined that the view of the Council was that the new school will not be required in the town until September 2025 at the earliest.

4.3 The Executive approved the proposal to seek expressions of interest in relocating an existing local school to the Glenvale Park site and approved the commencement of preparation for the accompanying statutory process. The Executive report presented on 8<sup>th</sup> June 2023 can be found in section 8 of this report.

## **5. Issues and Choices**

---

5.1 Individual options were considered regarding the Glenvale Park school building prior to the request for an expression of interest proposal.

## **Outcome of Expression of Interest, Interview and Selection Process**

- 5.2 Two expressions of interest were received. These were from Little Harrowden Primary School and Wilby CE VA Primary School.
- 5.3 A selection panel was formed for the interview process. This panel was made up of three Council Officers - a Headteacher from a Local Authority (LA) Maintained School, the Executive Member for Childrens, Families, Education and Skills and three Ward Councilors representing the Ward in which the schools were situated.
- 5.4 Only three panel members were able to vote at the end of the process, selecting the preferred school. The voting panel members were the Assistant Director for Education (Council Officer), Headteacher and the Executive Member for Childrens, Families, Education and Skills.
- 5.5 Following a rigorous interview process, a recommendation was put forward by the voting members of the panel that Wilby CE VA Primary School should be the school that relocates to the Glenvale Park development to coincide with the start of September 2024.

## **6. Next Steps**

---

- 6.1. The Executive is now invited to reflect on the outcome of the formal consultation when considering the request for approval of the relocation of Wilby CE VA Primary School to the Glenvale Park development.
- 6.2 The Executive decision must be made within a period of two months of the end of the formal consultation period. The reasons for the Executive decision must be published within one week of making a determination.
- 6.3 If the relocation of Wilby CE VA Primary School to the Glenvale Park development is approved, then the DfE guidance 'Making a Significant Change to an Academy or Maintained School' process will continue at pace. Simultaneously, the necessary preparations and planning for the relocation will begin immediately.

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

- 7.1.1 Should the preferred option be approved by Executive, from September 2024, the Council will incur revenue costs in the year of September 2024 opening and in each of the subsequent academic years thereafter for the additional growth, against the 'Pupil Growth Fund' element of the Dedicated Schools Grant DSG.
- 7.1.2. The Council may also incur additional transport costs for a 2-year period to facilitate the relocation of existing pupils.

- 7.1.3. There may be some capital investment needed to undertake some refurbishment of the school being vacated to facilitate the repurposing of the Wilby CE VA Primary School building. This will be met from available DfE Basic Needs or SEND Grant as appropriate.
- 7.1.4. A strategic assessment of the Wilby school building will be undertaken to assess what the most appropriate educational use will be should the Executive approve the proposal to relocate Wilby CE VA Primary School to the Glenvale Park development.
- 7.1.5. The following options have been discussed and explored for the future educational use of the Wilby school building:

**Option 1:**

A co-located centre for SEND which will support NNC with the current shortage of SEND places, a creation of such a unit for pupils with complex needs will support sufficiency of SEND places. It will also support pupils in making good progress towards the outcomes described in their Educational Health and Care Plan (EHCP).

**Option 2:**

A Hospital School is an Alternative Provision (AP) which provides educational support for children and young people aged 4 to 18 who cannot attend mainstream school due to a diagnosed medical/and or mental health condition.

Currently there are limited Alternative Provision (AP) places available to NNC pupils, with all major providers being based outside of the area. NNC is working proactively to establish a wider range of AP places for local pupils. The aim of is to ensure that the right provision is available locally to meet all needs.

## 7.2. Legal and Governance

- 7.2.1. Legal implications relate solely to ensuring that the period of consultation on this matter is conducted in full compliance with relevant legislation and guidance that govern relocating to a new site. The relevant legislation is:

[Making significant changes \('prescribed alterations'\) to maintained schools](#)

- 7.2.2. The statutory process that will be followed by the Council in relation to this proposal complies with all relevant DfE guidance on the subject and legislation that prescribes how school organisational changes of this nature must be enacted.
- 7.2.4. If the relocation is approved, the Wilby CE VA Primary School building would be transferred to the Council and Wilby CE VA Primary School would be issued a new 125-year peppercorn lease on the Glenvale Park Development.
- 7.2.5. Wilby CE VA Primary School is owned by the Diocese, they would need to sign the deeds over to the Council.

### 7.3. **Relevant Policies and Plans**

7.3.1. The specific DfE guidance which underpins the process is as follows:

Making significant changes ('prescribed alterations') to maintained schools statutory guidance for proposers and decision makers (January 2023) [Section: 'Transfer to a new site' page 17; and section: Statutory process: prescribed alterations page 35 for the process needed]

7.3.2. Consideration will need to be given to the support of existing pupils and their access to the new school at Glenvale Park.

### 7.4. **Risk**

7.4.1. The risks for the school relocation process have been explored fully in section 5 of the 'Primary Education Provision at the Glenvale Park Development Wellingborough North' paper presented to Executive on 8<sup>th</sup> June 2023.

### 7.5 **Consultation**

7.5.1 Although the DfE guidance does not prescribe that a 'pre-consultation' stage is statutory, it does state that there is a 'strong expectation' that any LA would conduct this stage prior to any formal statutory process when making a significant change to a maintained school or academy.

7.5.2. As part of the expression of interest phase of the process, both schools were asked to conduct an informal consultation with their community. The schools were required to summarise the outcome of their informal consultation in a designated section within their expression of interest.

7.5.3 Following the recommendation that Wilby CEVA Primary School should be the school that relocates to the Glenvale Park development, a formal 30-day public consultation was held in line with the DfE guidance.

7.5.4. The formal consultation ran from 5<sup>th</sup> September to midnight 5<sup>th</sup> October 2023.

7.5.5. The consultation was hosted on the Council's [Consultation & Engagement Hub](#). The consultation was supported by information including Frequently Asked Questions (FAQs) and a briefing paper containing a clear outline of the proposal.

7.5.6. Notification of the consultation was also published on the local BBC News website, sent to Councillors, Teaching and Support Staff Union Representatives, local Members of Parliament, town and parish Councils, partner organisations, members of the Council's Consultation Register, and members of the North Northamptonshire Residents' Panel who reside within the local area.

7.5.7 Consultees were able to have their say by:

- Visiting the dedicated consultation webpage and completing the questionnaire or requesting a paper questionnaire
- Emailing [schoolconsultation.nnc@northnorthants.gov.uk](mailto:schoolconsultation.nnc@northnorthants.gov.uk)
- Writing to North Northamptonshire Council, Consultation: Wilby relocation to Glenvale Park, Bowling Green Road, Kettering NN15 7QX
- Accessing the questionnaire free of charge at any North Northamptonshire Council library. Alternative formats of the questionnaire are offered upon request

7.5.8 Formal Consultation Response -In total, 204 respondents filled out a questionnaire, either partially or fully. Respondents did not have to answer every question and so the total number of responses for each question differs and is shown in relation to each question. Included were two written responses.

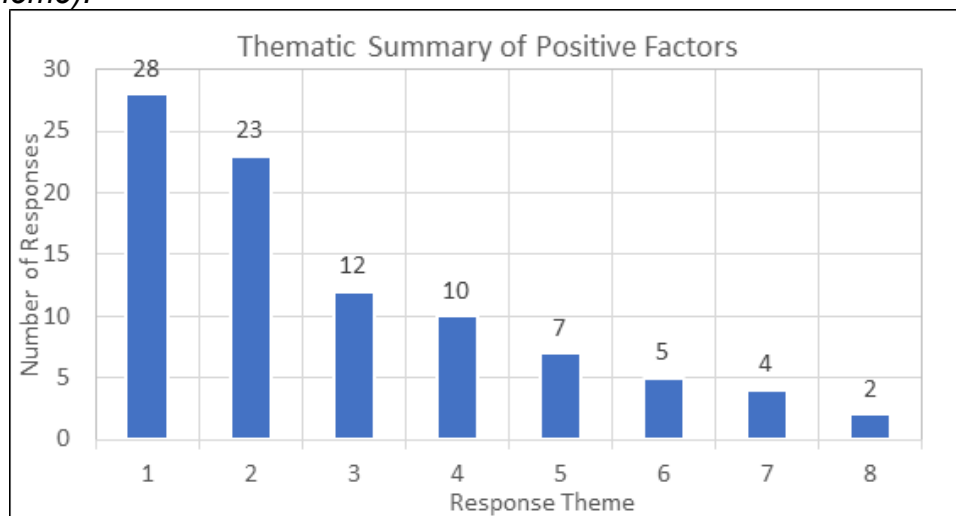
7.5.9 Details of how the respondents to the consultation was made up is included in the Public Consultation Analysis Report (**Appendix F**).

## 7.6 Common themes emerging from responses from Parents/Carers/Guardians and Staff of Wilby CEVA Primary School

7.6.1 The purpose of this section of the report is to give further clarification to the data by providing free text information aligned to common themes emerging from respondents during the consultation.

### 7.6.2 Summary of responses to the question: “If you think the proposal will have a positive impact, then please tell us why here.”

7.6.3 There were a total of 40 written responses to this question which raised positive themes. A summary of answers which mentioned one or more of the key themes identified is displayed below (*please note that a single response may cover more than one theme*):



| Theme Number | Theme   | Responses mentioning this theme | % of responses mentioning this theme |
|--------------|---|---------------------------------|--------------------------------------|
| 1            | A new school site would have the benefits of a larger building and modern facilities              | 28                              | 70%                                  |
| 2            | A new school site would have more outdoor green space compared to the current site                | 23                              | 58%                                  |
| 3            | A new school site would facilitate greater opportunities for pupils                               | 12                              | 30%                                  |
| 4            | A move is preferable due to the current site being unfit for purpose                              | 10                              | 25%                                  |
| 5            | A new school site could have more space for 1:1 learning and dedicated space for SEN students     | 7                               | 18%                                  |
| 6            | A move would allow better parking and access at the new site, and reduce traffic in Wilby village | 5                               | 13%                                  |
| 7            | A new school site would not require as much ongoing maintenance and associated costs              | 4                               | 10%                                  |
| 8            | A move would enable Wilby to maintain and improve its current academic strengths and reputation   | 2                               | 5%                                   |

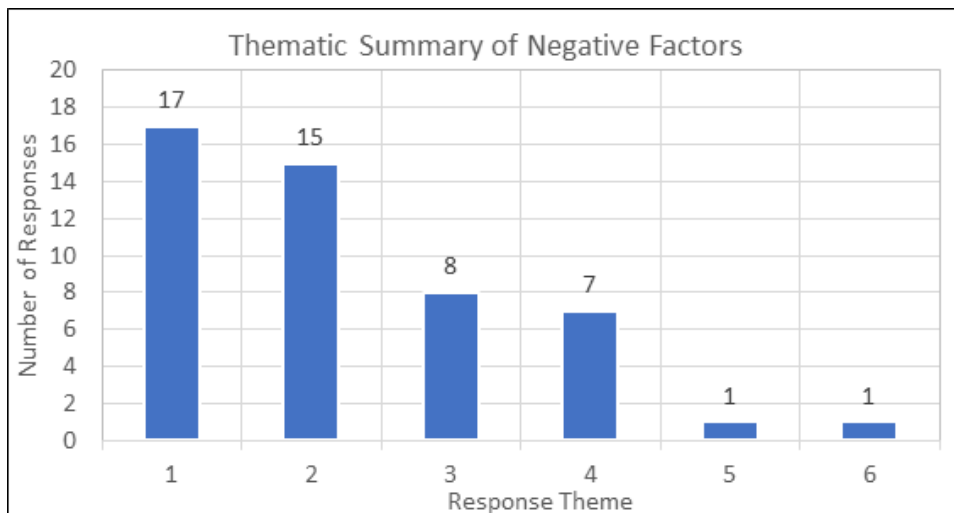
7.6.4 A majority (70%) of responses highlighted the positive benefits that a larger and more modern school site would bring, with many of these responses also highlighting the lack of space at the current site. A majority of responses (58%) also similarly noted that a new school site would have more green space which could be utilised for outdoor activities, breaktimes and physical education, contributing towards a better learning environment for pupils.

7.6.5 Approximately one-third of responses (30%) highlighted how a new, modern site would provide greater educational opportunities for pupils, as the new site could be built, for example, to incorporate dedicated spaces for different subject areas and extracurricular activities, including more modern technology and IT infrastructure when compared to the current site. One theme noted in 18% of responses was that the new site could provide dedicated space for SEN provision and smaller group work and 1:1 support sessions.

7.6.6 25% of responses specifically highlighted the physical and operational shortcomings of the current school site, noting that a move to a new site was necessary as the current site becomes more unfit for purpose; 10% of responses also noted that the current site is becoming increasingly more difficult and costly to adequately maintain. A related theme raised in 13% of responses was the positive impact that the move would have on relieving traffic and parking congestion in Wilby village, particularly during school opening and closing times.

**7.6.7 Summary of responses to the question: “If you think the above proposal would have a negative impact, please tell us why, along with any suggestions on how any potential negative impacts could be reduced or avoided”**

7.6.8 There were a total of 26 written responses to this question which raised negative themes. A summary of answers which mentioned one or more of the key themes identified is displayed below (*please note that a single response may cover more than one theme*):



| Theme Number | Theme  | Responses mentioning this theme | % of responses mentioning this theme |
|--------------|--|---------------------------------|--------------------------------------|
| 1            | Concerns about transport to/from Wilby to the new site   | 17                              | 65%                                  |
| 2            | Concerns that the new site would be too large and lose the character of a local village school | 15                              | 58%                                  |
| 3            | Concerns about the effect of the move on current pupils  | 8                               | 31%                                  |
| 4            | Concerns that a loss of the local village school could damage the local community and identity | 7                               | 27%                                  |
| 5            | Concerns that the school may become oversubscribed after moving to a new site                  | 1                               | 4%                                   |
| 6            | Concerns about whether the new site would be a Church of England school                        | 1                               | 4%                                   |

7.6.9 A majority of responses (65%) raised concerns about transport between Wilby and the proposed new site. Of these responses, several noted that the location of the new site would necessitate driving, which was not an option available to several respondents, or would necessitate additional costs for parents who might need to arrange transport.

7.6.10 Several responses also noted that the new site is not within an easy walking distance of Wilby village. Several responses further raised concerns about the location of the new site near busy roads. A subset of responses who raised concerns about transport noted that either the school or the local authority should consider providing and running a transport link between the village and the new site.

7.6.11 Another significant theme raised by a majority (58%) of responses was that the proposed new site could cause the school to lose its character as a local village school.

Several respondents noted that they had specifically selected the school due to its small size and caring environment, with several further expressing concerns about increased class sizes at the new site.

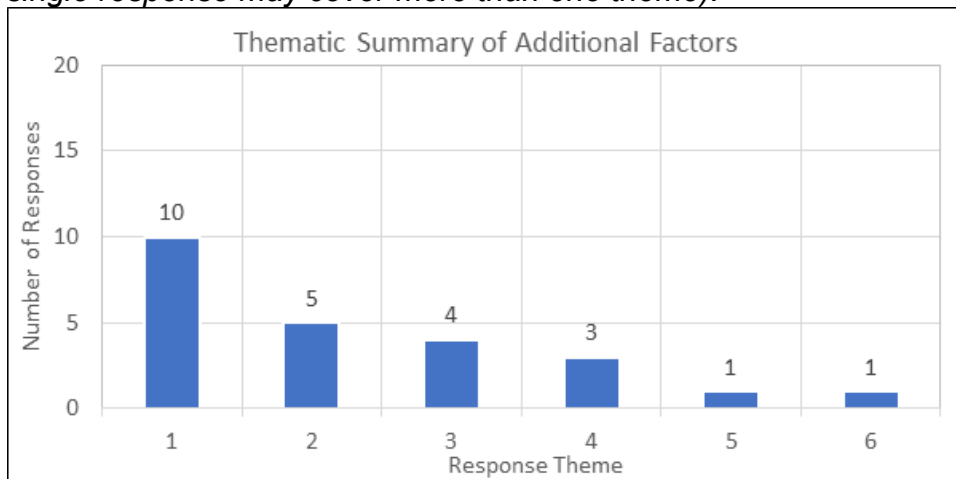
7.6.12 Approximately one-third of responses (31%) also expressed concerns that the move would negatively impact the educational experience of the children currently at the school and could lead to increased anxiety for children who struggle with change.

7.6.13 One response (4%) expressed concerns that the school could become oversubscribed in its new location. One response (4%) also raised concerns about whether the school would retain its status as a Church of England school following the move (several respondents who are residents of Glenvale Park but not parents/guardians of current pupils or members of staff, and therefore not included within the scope of this analysis, raised the inverse concern of whether the school on its new site should have a single religious character).

7.6.14 Just over a quarter (27%) of responses further noted that the school in its current location is a key component of the local village community, and expressed concerns that this would be lost as part of the move. Respondents noted that the current school is closely tied into the history of the village, and into the history of many village residents and families. Several of these responses noted that action should be taken to ensure the current site is repurposed for community use if the move proceeds.

**7.6.15 Summary of responses to the question: “If you have any other comments you would like to make that you have not already told us, then please tell us here:”**

7.6.16 There were a total of 22 written responses to this question. A summary of answers which mentioned one or more of the key themes identified is listed below (*please note that a single response may cover more than one theme*):





| Theme Number | Theme   | Responses mentioning this theme | % of responses mentioning this theme |
|--------------|---|---------------------------------|--------------------------------------|
| 1            | Reinforcement of positive comments  | 10                              | 45%                                  |
| 2            | Reinforcement of negative comments  | 5                               | 23%                                  |
| 3            | Comments about the necessity of the move  | 4                               | 18%                                  |
| 4            | Concerns over consultation process  | 3                               | 14%                                  |
| 5            | Comments about the need for a dedicated school bus to transport pupils to/from the new site   | 1                               | 5%                                   |
| 6            | Comments from a parent noting that they would rather transfer their children to a different school rather move them to the new site | 1                               | 5%                                   |

7.6.17 Nearly half of responses (45%) were reinforcing their previous positive comments feeling that the new school would provide better opportunities and reiterated the need for more open space, SEN facilities and modern technology. Many mentioned that the current school is no longer “fit for purpose” and the pupils and staff deserve a new, purpose-built school.

7.6.18 However, 18% of responses questioned the need to move as they felt that the current school provided everything that the pupils needed, and queried whether there were enough pupils to justify a bigger school at Glenvale Park.

7.6.19 3 responses (14%) had concerns and criticisms regarding the consultation process, with two of these believing that the decision to move the school had already been made.

7.6.20 A further 5 responses (23%) reinforced previous negative comments. They felt that many parents had chosen a village school for their children and this move was taking away their decision.

7.6.21 Following on from the previous negative issues raised, one respondent suggested the need for a dedicated bus service to transport Wilby residents to the new Glenvale Park site.

7.6.22 One parent commented that they would transfer their children to another school rather than move to Glenvale Park.

7.6.23 For a detailed summary of the formal consultation, please refer to the Public Consultation Analysis Report (**Appendix F**).

7.6.24 For the full consultation results, please refer to the Public Consultation Analysis Appendix Report (**Appendix G**).

## 7.7 Consideration by Executive Advisory Panel

7.7.1. The Future Communities Executive Advisory Panel (EAP), at their meeting on Thursday 7<sup>th</sup> September 2023, considered the ‘Wilby CE VA Primary School relocation to the

Glenvale Park Development, Wellingborough' and linked documents. There were no key issues raised at the meeting and its members supported the public consultation.

7.7.2. The Futures Communities Executive Advisory Panel (EAP), at their meeting on Thursday 2<sup>nd</sup> November 2023, considered the results of the public consultation and linked documents.

## 7.8 Consideration by Scrutiny

7.8.1 This report has not been considered by the Council's scrutiny function.

## 7.9 Equality Implications

7.9.1 An 'Equalities Screening Assessment' (ESA) has been completed in respect of this proposal and is attached as **Appendix A**.

7.9.2. The equality implications relating to the proposal to relocate Wilby CE VA Primary School has identified an impact on one of the protected characteristics as follows:

- Disability (characteristic) - the relocation to Glenvale Park may mean a longer walk for some pupils with SEND. Children and young people with SEND are potentially entitled to free transport where it is deemed unreasonable to expect them to be able to walk to school due to their SEND. The further distance of travel to Glenvale Park may have implications for this group.

7.9.3. In line with the Equality Act 2010 which places a general duty on all public bodies to have 'due regard' to eliminate discrimination and foster the opportunity of equality - the Local Authority in its responsibility through the North Northamptonshire Equalities Team stipulates that if an Equalities Screening Assessment (ESA) identifies a negative impact on any of the protected characteristics then an Equality Impact Assessment (EqIA) needs to be completed.

7.9.4. An Equality Impact Assessment (EqIA) was completed in respect of this proposal and is attached as **Appendix B**.

7.9.5. The Equality Impact Assessment confirmed that the further distance to travel to school may impact pupils with disabilities as a result, an Equality Impact Assessment Action Plan was prepared to address and where possible mitigate the potential negative impact identified.

7.9.6. Health and wellbeing were also considered as part of the Equality Assessment Screening and Equality Impact Assessment as recommended by the Equalities Team, and it identified that health and wellbeing as a characteristic could potentially be impacted by the further distance to travel to school.

7.9.7. The Equality Impact Assessment Action Plan is detailed below and is also located in **Appendix B**, it outlines what actions will be taken to eliminate or reduce the identified negative impact.

| Negative impact  | Action to eliminate/reduce negative impact   | Review outcome  |
|--|--|---|
| Further distance to travel to school for some children and their families. | <p>Review of the consultation responses once it closes, with a view to reviewing options for support with transport for impacted families who potentially have to travel further.</p> <p>Review of the admissions criteria to ensure that no pupil is disadvantaged by the proposal.</p> | <p>To ensure that no pupil, group or family is negatively impacted as a result of the proposal.</p> <p>To ensure that no pupil, group or family is negatively impacted by the proposal.</p> |

7.9.8. The school has been built to DfE standards to ensure the widest access to the curriculum and full accessibility for all of the community.

## 7.10 Climate and Environment Impact

7.10.1. New building regulations ensure that everything is directed at reducing carbon as a standard requirement.

7.10.2. All new builds, including Glenvale, incorporate the following as standard:

- Efficient electrical heating
- Overheating calculations which are now a requirement
- Insulation levels which have been increased
- The Simplified Building Energy Model (SBEM) will require solar photovoltaic (PV) system, mounted on the roof. This is an electrical installation that converts solar energy into electricity

## 7.11 Community Impact

7.11.1 This report seeks approval to begin the relocation of Wilby CE VA Primary School to the Glenvale Park Development, an initial consultation was undertaken by the applicants. A full formal consultation has run for four weeks, commencing from 5<sup>th</sup> September to midnight 5<sup>th</sup> October 2023.

7.11.2 A summary of the consultation is noted in section 7.5 in this report.

## 7.12 Crime and Disorder Impact

7.12.1. This proposal will have negligible, if any, crime and disorder impact.

## 8. Background Papers

---

|  |   |
|--|---|
| DfE statutory process that must be followed by the local authority if they wish to progress the relocation is laid out in the DfE guidance | <a href="#">Making significant changes ('prescribed alterations') to maintained schools (publishing.service.gov.uk)</a> |
| Executive Report 8 <sup>th</sup> June 2023   | <a href="#">Executive Report 8th June 2023</a>  |

## Equality Screening Assessment

The Equality Screening Assessment form must be completed to evidence what impact the proposal may have on equality groups within our community or workforce. Any proposal that identifies a negative impact must have a full Equality Impact Assessment completed before the proposal progresses further.

### 1: Proposal

| Requirement  | Detail   |
|--|--|
| Title of proposal  | Proposal of relocation of Wilby CE VA Primary School to the Glenvale Park Development, Wellingborough    |
| Type of proposal: new policy / change to policy / new service / change to service / removal of service / project / event/ budget | Relocation Project due to the newly purpose-built primary school at the Glenvale Park site.              |
| What is the objective of this proposal?  | To ensure that a newly built school does not remain empty with no pupil intake.                          |
| Has there been/when will there be consultation on this proposal?<br>(List all the groups / communities, including dates)         | Yes there will be a consultation which will be conducted by the LA which will be undertaken for 4 weeks. |
| Did the consultation on this proposal highlight any positive or negative impact on protected groups? (If yes, give details)      | N/A  |

|  |  |
|--|--|
| What processes are in place to monitor and review the impact of this proposal? | The success of the relocated school will be monitored by Ofsted in accordance with national processes for measuring school performance |
| Who will approve this proposal?  | Executive Director of Children's Services/CLT  |

## 2: Equality Consideration

In turn, consider each protected group to ensure we meet our legal obligations of the Equality Act (2010).

| Protected Groups   | General Equality Duty Considerations   | Changes   | Impact  |
|--|--|---|---|
|  | <ul style="list-style-type: none"> <li>• Include factual evidence of how people in this group may be affected.</li> <li>• Consider the outcomes and processes.</li> <li>• Does this seek to <b>eliminate discrimination</b>?</li> <li>• Does this promote <b>fostering good relations</b>?</li> </ul>  | <ul style="list-style-type: none"> <li>• What changes can be made to mitigate any negative impact?</li> <li>• Are there opportunities to <b>remove possible barriers or disadvantages</b> that a group may face?</li> </ul> | Delete as appropriate. There can be more than one answer per protected group. |
| <b>Age</b><br>Different age groups that may be affected by the proposal in different ways. | The proposal is for a primary school relocation and will educate children aged 4-11 years of age. The relocated primary school will provide education to children within Wellingborough, Wilby and Glenvale Park. In North Northamptonshire according to the 2021 census year there are just over 70,000 people 15 years or under living in North Northants. | No barriers identified.   | Positive  |
| <b>Sex</b><br>Is one sex affected more than another or are they affected the same?         | The relocated primary school will be mixed sex education.  | All strategies, policies, interventions should be subject to an equality assessment.  | Neutral   |
| <b>Disability</b>  | The new building will adhere to current Disability Discrimination Act (DDA) regulations.   | The building is DDA compliant as per current building regulations. The new building will also provide adequate  | Negative  |

| Protected Groups   | General Equality Duty Considerations  | Changes   | Impact   |
|--|---|---|--|
| <p>It is likely to have an effect on a particular type of disability?<br/>Why?</p>                           |   | <p>breakout/teaching spaces for pupils with SEND. The school complies with its SEND Code of Practice which is reviewed annually. The school's accessibility plan will also cover adherence to accessibility for all staff and pupils.</p> <p>The relocation to Glenvale Park may mean a longer walk for some pupils with SEND. Children and young people with SEND are potentially entitled to free transport where it is deemed unreasonable to expect them to be able to walk to school due to their SEND.</p> <p>The further distance of travel to Glenvale Park may have implications for this group.</p> | <p>Delete as appropriate. There can be more than one answer per protected group.</p> |
| <p><b>Gender Reassignment</b><br/>Will there be an impact on trans males and/or trans females?</p>           | <p>This proposal is not expected to impact Gender Reassignment.</p>   |   | <p>Neutral</p>   |
| <p><b>Race</b><br/>Are people from one ethnic group affected more than people from another ethnic group?</p> | <p>Admission to the school will be based on the approved admission criteria. The school will not select pupils based on either race or ethnicity.</p> | <p>In terms of race, there are EAL pupils who attend the school (English as an additional language). In line with usual policy management, the school will have</p>   | <p>Neutral</p>   |

| Protected Groups  | General Equality Duty Considerations  | Changes   | Impact  |
|---|---|---|---|
|   | <ul style="list-style-type: none"> <li>● Include factual evidence of how people in this group may be affected.</li> <li>● Consider the outcomes and processes.</li> <li>● Does this seek to <b>eliminate discrimination</b>?</li> <li>● Does this promote <b>fostering good relations</b>?</li> </ul> | <ul style="list-style-type: none"> <li>● What changes can be made to mitigate any negative impact?</li> <li>● Are there opportunities to <b>remove possible barriers or disadvantages</b> that a group may face?</li> </ul>   | Delete as appropriate. There can be more than one answer per protected group. |
| <p><b>Sexual Orientation</b></p> <p>Are people of one sexual orientation affected differently to people of another sexual orientation?</p>                | Sexual orientation will form no part of the criteria for school admissions purposes.  | an anti-bullying policy which is reviewed annually.<br><br>Any incidents against staff or pupils are monitored and recorded if any incidents/microaggressions are reported. In line with usual policy management, the school will have an equality policy which is reviewed annually. | Neutral   |
| <p><b>Marriage &amp; Civil Partnership</b></p> <p>Are people in a Marriage or Civil Partnership treated less favourably?</p>                              | Marriage or Civil Partnership is not part of the criteria for school admissions.  | No barriers identified.   | Neutral   |
| <p><b>Pregnancy &amp; Maternity</b></p> <p>Are people who are pregnant, or have a baby of 6 months old or younger, affected by this proposal?</p>         | This proposal is not expected to impact Pregnancy and Maternity.  | No barriers identified.   | Neutral   |
| <p><b>Religion or Belief</b></p> <p>Does the proposal affect people differently depending on whether they have or do not have a religion or a belief?</p> | The school that is recommended to relocate is Wilby CE VA Primary School, the proposal does not affect people differently, based on whether they have a religion or belief or not.  | No barriers identified.   | Neutral   |



| Protected Groups  | General Equality Duty Considerations   | Changes   | Impact          |
|---|--|---|-----------------|
| <p><b>Health &amp; Wellbeing</b></p> <ol style="list-style-type: none"> <li>1. Health behaviours (E.g. diet, exercise, alcohol, smoking)</li> <li>2. Support (E.g. community cohesion, rural isolation)</li> <li>3. Socio economic (E.g. income, education).</li> <li>4. Environment (E.g. green spaces, fuel poverty, housing standards).</li> </ol> | <p>This primary school will promote healthy lifestyles in line with the national curriculum. The primary school facilities will include a playing field and sports hall. This school will support the local economy, provide education and local school places for local children.</p> | <p>With Wilby being in a rural area the linked primary school which is often described as a catchment or designated area is Wilby CE VA Primary School.</p> <p>The NNC Admissions Prospectus is a tool for families understand the admissions process and also details all the schools in North Northamptonshire, it lists that the sibling criteria is listed as priority number 5 in the oversubscription criteria.</p> <p>The relocation to Glenvale Park may mean a longer walk to school for some pupils, which may have implications for some families.</p> | <p>Negative</p> |

### 3: Equality Impact

| Question  | Response               |
|---|------------------------|
| <p>What overall impact does the proposal have on the protected groups?</p> <p>If a negative impact is identified anywhere in section 2, the response will be Negative Impact.</p> | <p>Negative impact</p> |

|   |     |
|---|-----|
| Does an Equality Impact Assessment need to be completed?<br>(Yes, if any negative impact is found.) | Yes |
| Copy attached to relevant report?   | Yes |
| Is this document going to be published with the relevant report?                                    | Yes |

#### 4: Ownership

| Question                       | Response  |
|--------------------------------|---|
| Directorate                    | Children's Services   |
| Service area                   | Learning, Skills and Education  |
| Lead officer's name            | Marsha Brown  |
| Lead officer's job title       | Project Manager   |
| Lead officer's contact details | <a href="mailto:marsha.brown@northnorthants.gov.uk">marsha.brown@northnorthants.gov.uk</a>                  |
| Project Manager                | Marsha Brown ( <a href="mailto:marsha.brown@northnorthants.gov.uk">marsha.brown@northnorthants.gov.uk</a> ) |
| Lead Officers Signature        | Marsha Brown  |
| Date completed                 | 11 <sup>th</sup> August 2023  |



## Equality Impact Assessment

### 1: Background

| Requirement  | Detail   |
|--|--|
| Title of proposal  | <b>Relocation of Wilby CE VA Primary School to the Glenvale Park development (new school building), Wellingborough</b> |
| Type of proposal: new policy / change to policy / new service / change to service / removal of service / project | Project to relocate an existing primary school to a newly built school   |
| Directorate  | Learning, Skills and Education   |
| Service area   | School Effectiveness   |
| Lead Officer's name  | AnnMarie Dodds   |
| Lead Officer's job title   | Director of Children's Services  |
| Officer who completed Equality Screening Assessment  | Marsha Brown   |
| Equality Screening Assessment completion date  | 11 <sup>th</sup> August 2023   |
| Date Director informed of full assessment requirement  | 1 <sup>st</sup> September 2023   |
| Equality Impact Assessment completion date   | 1 <sup>st</sup> September 2023   |

## 2: Legal Requirements

The Equality Act (2010) places a general duty on all public bodies to have `due regard` to:

Eliminate discrimination, harassment and victimisation.

Foster good relations.

Advance the opportunity of equality.

Equality Impact Assessments help us evidence that we have met the requirements of the General Equality Duty. As a local authority we also have a specific duty to publish information about people who are affected by our policies and practices. All Equality Impact Assessments will be published with the Equality Screening Assessment (ESA) on the [North Northamptonshire Council website](#).

## 3: Proposal Details

Description of the proposal:

The Glenvale Park site is located in Wellingborough, to the north of the town. Once complete there will be circa 3,000 homes. As part of the infrastructure and Section 106 (S106) proposals for the Sustainable Urban Extension (SUE), a 2-form entry primary school was proposed to meet increased demand and serve the local community. The school building construction completion date is August 2023.

In January 2023, as part of the annual strategic Pupil Place Planning exercise, it became clear that due to demographic changes, there would be insufficient demand to support the new school opening until September 2025. To address this issue, the relocation of an existing primary school opportunity to the Glenvale Park site was developed and publicised to local primary schools. These local schools were invited to express their interest in relocating to the new school on the Glenvale Park site. This relocation opportunity would avoid the newly built school being left empty or repurposed by the

developers to meet an existing need with consideration to the rules of S106.

Following North Northamptonshire Council receiving two completed expressions of interest applications to relocate. A panel was convened to conduct a robust interview process with the schools who had completed an expression of interest. The panel was made up of voting and non-voting members. Voting panel members made the final decision and recommended that Wilby CE VA Primary relocates to the Glenvale Park site.

What are the key objectives of this proposal?

- To support children and young people and their families to access high quality sustainable education facilities that enable the achievement of the best outcomes.
- To progress the relocation of the school in accordance with legislative requirements and Department for Education (DfE) statutory guidance.
- To ensure the delivery of sufficient suitable school places that meet the needs of the community now and in the future.
- To make effective and efficient use of the education estate to meet the needs of all pupils.

Advantages of relocating an existing school:

- There is no need to create additional capacity.
- The relocated school will not impact on other schools.
- Relocating an existing school can be delivered relatively quickly.
- If approved by the North Northamptonshire Executive Council, it will be ready to open by September 2024.
- The school will bring with it all year groups, rather than filling from Reception upwards as would happen for a new school which means more capacity from day one.
- Children from an existing school site will be able to utilise a brand-new building with capacity to expand.
- The vacated site can be reutilised for other educational purposes for example for SEND educational purposes.
- A new and purpose-built facility supports improved outcomes for all members of the school community.
- It enables the Local Authority (LA) to fulfil its statutory duties to provide sufficiency of places.
- The Department for Education (DfE) support this approach.
- The new school is fully accessible to pupils and staff.

- Opportunity for the two communities to work together in community activities.

The school which is affected by this proposal is Wilby CE VA Primary School.

Who will benefit from this proposal?

The pupils of Wilby CE VA Primary School will have the opportunity to learn and flourish in a fit for purpose new school building that has adequate external spaces and adequate dedicated intervention group spaces. A purpose-built new school will provide the opportunity for staff to teach in a fit for purpose building with excellent space for breakout areas for intervention groups, adequate external play areas and classrooms with upgraded IT infrastructure. These are a few examples of how this proposal will directly positively impact the staff of Wilby CE VA Primary School.

What were the findings of the initial Equality Screening Assessment?

- Having followed the DfE Guidance 'Making a Significant Change to an Academy or Maintained School' the local authority has demonstrated due diligence in the expression of interest process. The relocation of Wilby CE VA Primary School could potentially have a negative impact on some families who may have to travel further to Glenvale Park.
- The Council is clear that this proposal is not intended to financially disadvantage families. If the recommendation to relocate Wilby CE VA Primary School is approved by the North Northamptonshire Council Executive, this aspect will be carefully considered in order to minimise any related cost as much as possible. Once the consultation has ended, the responses will give us a better understanding of the impact.
- Equally, the ESA identified that this is a good opportunity to start afresh by ensuring that policies and processes are updated to reflect the newly joined communities, should this be approved. This would further support individuals within the following groups: Age, Disability, Health and Wellbeing in the communities that they serve.

#### 4: Data Evidence

What information or data, additional to that found in the ESA, have you obtained?

The North Northamptonshire Council Executive approved the proposal to seek expressions of interest from existing local schools to relocate to the Glenvale Park site on the 8<sup>th</sup> June 2023.

To support the potential impact of this proposal, the Local Authority are launching a public consultation proposing that the Wilby CE VA Primary relocates to the Glenvale Park site. The public consultation invites the views of the local community and will run from the 5<sup>th</sup> September through to midnight on the 5<sup>th</sup> October 2023.

Once the consultation has ended the responses will help to inform an assessment of the impact of the proposal on protected groups.

In its decision-making process, the North Northamptonshire Council Executive will seek to mitigate risks and formulate actions that will support all protected groups throughout the relocation of the school community to the Glenvale Park site.

## 5: Equality Impact

Using the evidence gathered above, describe the potential negative impact this proposal may have on individuals or groups because of their characteristics in the table below. Ensure you consider different groups within each of the protected groups.

| Characteristic                | Potential negative impact            |
|-------------------------------|--------------------------------------|
| Age                           | None                                 |
| Disability                    | Further distance to travel to school |
| Sex                           | None                                 |
| Marriage or Civil Partnership | None                                 |
| Pregnancy or Maternity        | None                                 |
| Race                          | None                                 |
| Religion or Belief            | None                                 |
| Gender Reassignment           | None                                 |

| Characteristic       | Potential negative impact            |
|----------------------|--------------------------------------|
| Sexual Orientation   | None                                 |
| Health and Wellbeing | Further distance to travel to school |

## 6: Consultation

Who has been consulted with as part of this Equality Impact Assessment?

N/A

Are further consultations planned? (Give dates, explain reason why this group is to be consulted).

Yes. A public consultation on the recommendation to relocate Wilby CE VA Primary School to the new school building at the Glenvale Park site commences on Tuesday 5<sup>th</sup> September and will run for four weeks.

## 7: Assessing the Impact

The negative impact identified in the ESA will affect potentially some families who live in Wilby, including families with SEND. The negative impact will be mitigated as far as possible if the North Northamptonshire Council Executive approve the recommendation for Wilby CE VA Primary School to relocate.

## 8: Monitoring and Evaluation

What monitoring systems are in place to measure and monitor the impact that the proposals have on protected groups?

Local Authority Council Officers will work closely with the Governing Body and Headteacher of Wilby CE VA Primary School to understand the impact of the relocation on the protected groups. Opportunities to mitigate any identified negative impacts will also be identified and carefully considered as part of this process.




## 9: Decision Making Summary

Findings should be summarised here. Highlight how the proposal contributes towards the General Equality Duty. Include changes you have made as part of this process.

The North Northamptonshire Council Executive will make a decision in November 2023 regarding the recommendation to relocate Wilby CE VA Primary School.

The Council will look to mitigate the negative impact on having to travel further for some families. The potential impact on the protected groups that is identified will be mitigated through these actions the effectiveness of the actions will be assessed and monitored throughout the year.

## 10: Authorisation

|                                   | Signature   | Date      |
|-----------------------------------|---|-----------|
| Approved by Equalities Team       |  | 5.09.2023 |
| Authorised by Department Director |   |           |

A signed copy should be retained by the owner for audit purposes.

A completed copy should be attached to the relevant report/policy/proposal.

An electronic copy must be emailed to [NNC Equalities](#) to be logged and published.

## 10: Equality Impact Assessment Action Plan

| Negative impact  | Action to eliminate or reduce negative impact.  | Officer responsible | Action target date | Review outcome (has the action had the intended outcome)                                     |
|--|---|---------------------|--------------------|--|
| Further distance to travel to school for some children and their families. | Review of the consultation responses once it closes, with a view to review options for support with transport for impacted families who potentially have to travel further. | Marsha Brown        | Jan 2024           | To ensure that no pupil, group or family is negatively impacted as a result of the proposal. |
|  | Review of the admissions criteria to ensure that no pupil is disadvantaged by the proposal.   | Marsha Brown        | Jan 2024           | To ensure that no pupil, group or family is negatively impacted by the proposal.             |



## **Consultation on the proposal to relocate Wilby CE VA Primary School to the Glenvale Park Development**

### **Frequently Asked Questions (FAQs)**

#### **1. What is this consultation about?**

North Northamptonshire Council is proposing to relocate Wilby CE VA Primary School to a new school building at the Glenvale Park development in Wellingborough with effect from September 2024.

The purpose of the consultation is to seek the views of staff, Governors, parents and carers of pupils at Wilby CE VA Primary School and other interested parties before a decision can be taken on whether or not the recommendation to relocate the school will take place.

#### **2. What does “relocation of an existing school” mean?**

A relocation of an existing school means the whole school will move to the new school building. Wilby CE VA Primary School will literally be lifted and moved to the newly built primary school located on the Glenvale Park development.

#### **3. Why do we need to relocate an existing school to the newly built primary school at Glenvale Park?**

Once the Glenvale Park development is complete there will be circa 3,000 homes. As part of the infrastructure and Section 106 (S106) proposals for the Sustainable Urban Extension (SUE) a 2-form entry primary was proposed to meet increased demand and serve the local community. Completion of the new school building is expected in August 2023.

In January 2023, as part of the annual strategic Pupil Place Planning exercise, it became clear that due to demographic changes, there would be insufficient demand to support the new school opening until September 2025. To address this issue, the relocation of an existing primary school opportunity to the Glenvale Park site was developed and publicised to local primary schools. These local schools were invited to express their interest in relocating to the new school on the Glenvale Park site.

This relocation opportunity would avoid the newly built school being mothballed or repurposed by the developers to meet an existing need with consideration to the rules of S106.

#### **4. What will happen to the staff at Wilby CE VA Primary School?**

All staff at Wilby CE VA Primary will relocate to work in the new school building at Glenvale Park, Wellingborough.

**5. Will Wilby CE VA Primary School have a new school uniform?**

Any decision on whether there will be a new school uniform will be made by the Governors of Wilby CE VA Primary School.

**6. What will happen to the vacated school building?**

The vacated school building will be repurposed for educational uses.

**7. How will the relocation benefit the pupils of Wilby CE VA Primary School?**

The pupils of Wilby CE VA Primary School will have the opportunity to learn and flourish in a fit for purpose new school building that has adequate external spaces and adequate dedicated intervention group spaces.

**8. How will the relocation benefit the staff of Wilby CE VA Primary School?**

A purpose-built new school will provide the opportunity for staff to teach in a fit for purpose building with adequate space for breakout areas for intervention groups, adequate external play areas and classrooms with upgraded IT infrastructure. These are a few examples of how this proposal will directly positively impact the staff of Wilby CE VA Primary School.

**9. Will Wilby CE VA Primary School capacity change?**

Wilby CE VA Primary School is currently 0.5FE, we will look to increase this to 1FE in the short term (the timing of this to be agreed) to support the school's financial viability. We do not expect this to impact on the surrounding schools.

**10. Will the relocation move disrupt learning?**

No. The relocation will be carefully planned and managed once the final decision is made by the North Northamptonshire Executive Council in November 2023. The Council will support Wilby CE VA Primary School to ensure a smooth transition from the Wilby school building to the newly built school at Glenvale Park.

**11. When will the relocation move take place?**

The final decision on whether Wilby CE VA Primary School relocates to the Glenvale Park site will be made by the North Northamptonshire Executive Council in November 2023. Following the Executive Council decision, a press release will be issued announcing the decision. If the Executive Council approve the relocation, the move will take place to coincide with the start of the academic year September 2024.

**12. What would be the admission arrangements?**

The admission arrangements will not change for families wanting to apply to Wilby CE VA Primary School. As the Glenvale Park development grows, primary aged children from the development would be invited to apply for a school place as part of the normal admissions process.

**13. Will the school's name change as a result of the relocation?**

Any decision on a new school name will not be made by the local authority, if any decision is to be made it will be made by Wilby CE VA Primary School and Governors.

**14. Will there be school transport available if needed by some pupils?**

North Northamptonshire Council would like to reassure all families affected by this proposal that it is our intention to ensure that no family will be financially disadvantaged by this move. If the recommendation is approved by the North Northamptonshire Council Executive this area of the relocation process will be considered.

**15. If a significant number of stakeholders are opposed to this proposal, how will the Council take their views into account?**

The Council will seek views from all interested parties and will balance this against its responsibility to effectively utilise its educational asset portfolio. Before making any final decision, the Council will consider a number of factors including views gathered from this consultation, any effect on school standards and the current accommodation at Wilby.

**16. How can you make your views known?**

We would like to hear your views on the proposal to relocate Wilby CE VA Primary School to the newly built school at the Glenvale Park site.

You can tell us whether you agree or disagree with the proposal and leave your comments. You have until **5<sup>th</sup> October 2023** to let us know your views. All responses will be taken into account once the consultation closes, however, we will not be able to acknowledge or respond individually to your comments.

You can give your views by completing the response form online [here](#).

Alternatively, you can email or send your comments in by post by using the contact details below.

If you have any queries, comments or would like a copy of this questionnaire in another format (including paper, easy read or large print) please contact us.

**Email address:** [schoolconsultation.nnc@northnorthants.gov.uk](mailto:schoolconsultation.nnc@northnorthants.gov.uk)

**Postal address:**

North Northamptonshire Council  
Consultation: Wilby CE VA Primary School relocation to Glenvale Park  
Bowling Green Road  
Kettering  
NN15 7QX

**17. What happens next?**

At the end of the formal consultation period (4 weeks), the Council will consider the feedback and views expressed by all interested parties during the consultation. The formal consultation period provides the opportunity for people and stakeholders to submit their views and comments on the proposal.

Subject to the outcome of this formal consultation period, the Council intends to make a final decision on the proposal on the **16<sup>th</sup> November 2023**.

## **Formal Consultation: Proposed relocation of Wilby CE VA Primary School to the Glenvale Park Development (new school), Wellingborough**

### **Consultation Questionnaire**

The purpose of the Formal Consultation:

This formal consultation is about a proposed primary school relocation opportunity to move into a brand-new school building:

- Following North Northamptonshire Council receiving two completed expressions of interest applications to relocate, the panel met following a robust interview process and recommended that Wilby CE VA Primary relocates to the Glenvale Park site

Wilby CE VA Primary School:

- Provides education for children aged 4 to 11 years
- Wilby is a Church of England village primary school located in the village of Wilby
- The distance from Wilby CE VA Primary School to Glenvale Park development is 2.4 miles
- The vast majority of pupils reside in Wellingborough
- Wilby is a Local Authority Maintained School
- Currently has a Good Ofsted rating

The Glenvale Park site is located in Wellingborough, to the north of the town. Once complete there will be circa 3,000 homes. As part of the infrastructure and Section 106 (S106) proposals for the Sustainable Urban Extension (SUE), a 2-form entry, 60 places per year group, primary school was proposed to meet increased demand and serve the local community. The school building construction completion date is August 2023.

As part of the annual strategic Pupil Place Planning exercise undertaken in January 2023, it became clear that, due to demographic changes, there would be insufficient demand to support the school opening until September 2025 or beyond.

Based on this position work has been undertaken to assess the options for the new school to ensure:

- The local community has access to sufficient school places
- No schools are disadvantaged
- Available assets are used as effectively as possible

#### **The Proposal**

This consultation seeks your views on the proposal that Wilby CE VA Primary School relocates to the new school at Glenvale Park, opening at the start of the new school year in September 2024. There will be no change to the current arrangements regarding the provision of SEN places at Wilby CE VA Primary School.

**What is the relocation of an existing school?**

A relocation of an existing school to a new school building means that the whole school including all children, all staff members and all fixtures and fittings and resources will be relocated to the new school. This move will be planned and managed to ensure that there is no disruption to learning.

**Advantages of relocating an existing school**

- There is no need to create additional capacity
- The relocated school will not impact on other schools
- Relocating an existing school can be delivered relatively quickly
- If approved by the North Northamptonshire Executive Council, it will be ready to open by September 2024
- The school will bring with it all year groups, rather than filling from year R upwards as would happen for a new school
- Children from an existing school site will be able to utilise a brand-new building with capacity to expand
- The vacated site can be reutilised for other educational purposes
- A new and purpose-built facility supports improved outcomes for all members of the school community
- It enables the LA to fulfil its statutory duties to provide sufficiency of places
- The Department for Education (DfE) support this approach

**Risks of relocating an existing school**

- There may be local opposition to relocating an existing school
- Consideration would have to be given to support existing pupils to access the new site

Further information is available on our Frequently Asked Questions (FAQs) document.

**Timetable and Next Steps**

| Stage | Description                                 | Timescale  | Comments   |
|-------|---|--|--|
| 1.    | Representation (Formal consultation period) | 5 <sup>th</sup> Sept – 5 <sup>th</sup> Oct 2023  | Representation for a period of 4 weeks                                 |
| 2.    | NNC Executive                               | 16 <sup>th</sup> Nov 2023                        | Decision – on Wilby CE VA Primary relocating to the Glenvale Park site |
| 3.    | DfE relocation process                      | 17 <sup>th</sup> Nov – 17 <sup>th</sup> Dec 2023 | Making a significant change to a maintained school process             |

**Have your say**

Please tell us your views by completing this questionnaire. All views submitted during the representation period will be considered, including all support for, objections to, and comments on the proposal.

Your feedback will be part of a report with many other people’s feedback, so you will not be personally identified.



You can also access this online questionnaire free of charge at any North Northamptonshire Council library. Customers are asked to check the opening times of the library you wish to visit and book an appointment in advance. Please see the [Library website](#) or telephone 0300 126 3000 to check times and make a booking.

Alternatively, you can email or send your comments in by post by using the contact details below.

If you have any queries, comments or would like a copy of this questionnaire in another format (including paper, easy read or large print) please contact us.

**Email address:** [schoolconsultation.nnc@northnorthants.gov.uk](mailto:schoolconsultation.nnc@northnorthants.gov.uk)

**Postal address:**

North Northamptonshire Council  
Consultation: Wilby CE VA Primary School relocation to Glenvale Park  
Bowling Green Road  
Kettering, NN15 7QX

**This consultation will run from Tuesday 5<sup>th</sup> September 2023 to midnight on Thursday 5<sup>th</sup> October 2023.**

**Thank you for helping us by completing this questionnaire.**

For information about how consultation and engagement responses are managed, please see the [consultation and engagement privacy notice](#).

## Questions

### About you

**Q) I am:**

- Pupil
- Parent/carer/guardian
- Member of the Parent Teacher Association (PTA)
- Member of staff
- North Northamptonshire Councilor
- Town or Parish Councilor
- Local resident
- Local business
- Local support group
- Local community group
- Local community group who uses the school for running activities
- Other, please give details

**Q) How does the primary school relocation affect you, are you connected to?**

- Wilby CE Primary School
- Resident of the Glenvale Park development
- Both
- Neither

### **The Proposal**

As a reminder, we are proposing to relocate Wilby CE VA Primary to the Glenvale Park new school building. This means that Wilby CE VA Primary School will be located on the Glenvale Park site, and the vacated smaller school be reutilised for other educational purposes.

**Q) To what extent do you support or oppose the proposal?**

- Strongly support
- Tend to support
- Neither support nor oppose
- Tend to oppose
- Strongly oppose
- Don't know

**Q) If you think the proposal will have a positive impact, then please tell us why here:**  
[comment box]

**Q) If you think the proposal would have a negative impact, please tell us why, along with any suggestions on how any potential negative impacts could be reduced or avoided:**  
[comment box]

**Q) If you have any other comments you would like to make that you have not already told us, then please tell us here:**  
[comment box]

### **More about you**

- Q) Are you responding to this questionnaire as an individual or on behalf of an organisation, business or community group?**
- As an individual
  - On behalf of an organisation, business or community group

### **Organisations**

- Q) Please tell us the name of the organisation, business or community group that you are responding on behalf of and your job title/role:**

Name of organisation, business or community group: [comment box]

Job title/role: [comment box]

## **Individuals**

### **Q) What is your postcode?**

By providing us with your postcode, you are consenting for us to use this information to understand where respondents live. If you do not consent to us using this information in this way, please do not provide your postcode.

[Individuals will then be asked to complete our standard equality monitoring questions upon completion of the questionnaire]

This page is intentionally left blank

## EXECUTIVE 8<sup>th</sup> June 2023

|                      |   |
|----------------------|---|
| <b>Report Title</b>  | <b>Primary Education Provision at the Glenvale Park Development, Wellingborough North</b>                       |
| <b>Report Author</b> | AnnMarie Dodds – Executive Director for Children’s Services<br><br>Jo Hutchinson - Head of School Effectiveness |
| <b>Lead Member</b>   | Cllr Scott Edwards – Executive Member for Children, Families, Education and Skills                              |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

**Appendix A** – Documents for the ‘relocation’ process

**Appendix B** – Glenvale Proposed School Opening

#### **1. Purpose of Report**

---

- 1.1. To inform the Executive of the impact of changing demography on the need for a proposed new primary school on the Glenvale Park development in Wellingborough North.
- 1.2. To inform the Executive of the outcomes of the options appraisal that has been undertaken in response to these changes.
- 1.3. To ask the Executive to approve a proposal to seek expressions of interest from existing local schools to relocate to the Glenvale Park site.
- 1.4. To inform the Executive of the processes that will be used to assess expressions of interest and the further actions that will be required to approve and implement such a change.

## **2. Executive Summary**

---

- 2.1. The Glenvale Park site is located in Wellingborough, to the north of the town. Once complete there will be circa 3,000 homes. As part of the infrastructure and Section 106 (S106) proposals for the Sustainable Urban Extension (SUE), a 2-form entry, 60 places per year group, primary school was proposed to meet increased demand and serve the local community. The school is now under construction with an expected completion date of August 2023.
- 2.2. As part of the annual strategic Pupil Place Planning exercise undertaken in January 2023, it became clear that, due to demographic changes, there would be insufficient demand to support the school opening until September 2025 or beyond.
- 2.3. Creating additional school places, through opening the new school, would be likely to have a detrimental impact on surrounding schools. In addition, all new schools must be Academies, funded directly by Department of Education (DfE). DfE will not provide funding unless demand for places can be clearly demonstrated. This would not be the case for a new school at Glenvale Park at this time.
- 2.4. Based on this position, work has been undertaken to assess the options for the new school to ensure the local community has access to sufficient school places, that no schools are disadvantaged and that available assets are used as effectively as possible.
- 2.5. This report provides an overview of the options considered for the future of the school provision on the Glenvale Park site. This concludes that offering local schools the opportunity to express an interest in moving to the new site would deliver the best outcomes for the community.
- 2.6. As part of any expression of interest, there will be a requirement to clearly set out how any move would support the existing school community as well as those living in the new Glenvale Park development. There will also be an expectation that appropriate community consultation is undertaken and that this shows support for the proposed move.
- 2.7. If the decision is taken to progress with this proposal, DfE guidance 'Making Significant Changes' section title: 'Transfer to a New Site' for academies and for maintained schools will be followed.

## **3. Recommendations**

---

- 3.1. It is recommended that the Executive:
  - i) Approve the proposal to seek expressions of interest in relocating an existing local school to the Glenvale Park school.

- ii) Approve the commencement of the preparation for the statutory process relating to making a significant change to an academy or a maintained school.
- iii) Note that a further report will be brought forward setting out the outcome of the expression of interest process and seeking a formal decision about whether to proceed on this basis.

### 3.2 Reasons for Recommendation:

- Ensure the delivery of sufficient suitable school places that meet the needs of the community now and in the future.
- Ensure pupils have access to high quality facilities that support their education.
- Making effective and efficient use of the education estate to meet the needs of all pupils.
- Ensure full transparency of the process being followed.
- Allows for all interested parties to have their views heard and considered as part of the decision-making process.
- Will evidence that appropriate steps are taken in line with statutory guidelines and within appropriate timescales.
- Allows Executive to be further updated on the outcome of the expressions of interest ahead of any further decision making.
- Is in accordance with the DfE legislation and policy on making significant changes to an academy or maintained school.
- Demonstrates to the governing bodies/trustees of any schools wishing to make an application that the council are progressing a shared solution in line with their expression of interest.

### 3.3 Alternative Options Considered:

- Establishing a new Primary School at Glenvale Park – Pupil place planning data does not support the creation of a new Primary School in the Glenvale area at this time. Over provision of places would have a detrimental impact on surrounding schools leading to financial viability concerns. In addition, DfE would not fund a school where the need for additional places is not supported through the place planning process.
- Identify an alternative use for the school site. There is need for additional SEND places in the North Northamptonshire area. However, repurposing the school buildings would be costly and would not be in line with the development agreement.
- Leave the site vacant until demand for places increases. Based on available Pupil Place Planning data, the need for places is unlikely to grow for some years. Even at that time, this may not justify a new 2 Form of

Entry school on this site. Leaving the site unused for an extended period of time is a poor use of resources and creates additional costs in areas such as security and maintenance.

#### **4. Report Background**

---

- 4.1. There are two large new housing developments currently being progressed in Wellingborough, Stanton Cross (SC), 3,650 dwellings, and Glenvale Park (GP), 3,000 dwellings.
- 4.2. Each new development will provide one, or more, new primary schools to mitigate against the pupil yield each new development will generate. The relevant S106 agreements provide sites and the funding for these new schools.
- 4.3. The first primary school on the Stanton Cross development is now completed and opened in September 2022.
- 4.4. It was proposed that the new school on the Glenvale Park Development will be a co-educational mainstream sponsored academy primary school for children aged 4 to 11 years, with a total capacity of 420 pupils (two forms in each year group), once fully open.
- 4.5. The Council was successful in negotiating a S106 agreement for a new primary school at Glenvale Park Development. This allows the developer to deliver the school, independently of the Council. The developer has commenced construction on the school building and anticipates that it will be completed by September 2023. However, it is important to note that the S106 agreement does not make any provision as to when the new school should be opened.
- 4.6. However, following a place planning review of both existing demand within Wellingborough and the current, and forecast, progress of each development in terms of housing completions, it is the view of the Council that the new school will not be required in the town until September 2025 at the earliest. Opening prior to this would have a detrimental impact on surrounding schools and create significant surplus capacity.
- 4.7. Pupil projection forecasts for the Wellingborough area currently indicate that the total number of pupils attending Wellingborough area primary schools is due to decrease by 568, or 1.3 2 form entry evident in **Appendix B**.
- 4.8. Both the developer for Glenvale Park and the Council Access and Sufficiency Team have been apprised of the situation in respect of the demand for the new primary provision in Wellingborough and the Council position that there is not the need for a new primary school for September 2023.
- 4.9. Where a new school is proposed, the Council is responsible for conducting the Free School Presumption (FSP) process to appoint an Academy Sponsor to operate the new school once it opens via a Local Authority (LA) run competition in which Academy Trusts submit bids. The LA confers 'preferred bidder' status



on the Trust which will run the school. The decision is then ratified by the Regional Director (RD) at the DfE who ultimately appoints the sponsor and decided if and when the new school can open.

- 4.10. The DfE's position has been sought and they have provided clear advice that they would not expect and LA to progress the opening of a new school via the FSP route unless demand for the new school can be clearly evidenced.
- 4.11. Should the opening of the proposed new school at Glenvale Park be progressed earlier than required, it is highly likely that this over provision of primary capacity within the wider area would disproportionately impact upon other schools in the area. This would impact by reducing future pupil intakes and consequently, affect the budget of the schools.
- 4.12. This would in turn impact upon the ability of those schools to effectively deliver the curriculum to pupils attending. In a worst-case scenario, it could result in a school that is forced to close.

## **5. Issues and Choices**

---

- 5.1. There are several options which have been considered prior to the final proposal being presented in this report.
- 5.2. The following options were considered in the decision-making process:
  - Option 1: Mothball the school build until demand for places increases
  - Option 2: Repurpose the school building to meet an existing educational need
  - Option 3: Relocate an existing school from the local area into the school being built at Glenvale Park
- 5.3. All options considered must be mindful of the S106 agreement for the Glenvale Park Development.

### **5.4. Option 1: Mothball the School Build**

5.4.1. The building would still need to be maintained and secured whilst mothballed, so this option is not without cost implications. This would also not be a good use of assets that should be supporting services to the community.

#### 5.4.2. Advantages

- A new school will be ready to open as and when places are needed.
- The asset is not lost to the educational estate.
- The FSP competition can be undertaken as and when required to identify an Academy Sponsor.

#### 5.4.3 Disadvantages

- Leaving a high value asset unused is an ineffective use of assets resources.
- Securing and maintaining the building will incur ongoing costs.

### 5.5 Option 2: Repurpose the School Building to Meet an Existing Educational Need

5.5.1. The Council has identified that there is need to develop additional capacity in support of SEND provision through the delivery of new SEN units and Special Schools. The new school building could be repurposed to meet this need and operate as a SEND base.

5.5.2 As with option 1, consideration of the section 106 criteria and obtaining the Developer's agreement via a Deed of Variation (DoV) would be necessary to enable this option to be delivered.

5.5.3. This option would also require additional capital investment to undertake any necessary adaptations for change of use.

#### 5.5.4. Advantages

- The building being repurposed may address a particular local or wider SEND need for children in the Wellingborough Locality Area.
- This would be an effective use of an education resource.
- A new provision would support the aspirations of the SEND strategy.

#### 5.5.5. Disadvantages

- This may not meet the requirements of the original S106 agreement which may have to be re-negotiated.
- The cost of making the required alterations to the building to meet SEND needs would be significant.
- Mainstream place numbers could not be flexed in future years to address additional demands as further developments are completed.
- The development of Glenvale Park was always envisaged to include a primary school and to not deliver this would impact on transport and other strategic planning assumptions.

### 5.6. Option 3: Relocate an Existing School to the Glenvale Park Development

5.6.1. This option would give an existing school the opportunity to move into a new school building on the Glenvale Park Development.

#### 5.6.2. Advantages

- This does not create additional capacity for the first few years and so does not impact on other schools.

- The school would bring with it all year groups, rather than filling from the reception year upwards, which would meet a broader need created by the new development.
- It would enable a school in poor or unsuitable accommodation to move to a purpose-built facility.
- The vacated smaller site could be re-purposed for other educational uses.
- A new and purpose-built facility supports improved outcomes for all members of the school community.
- The school can be relocated for a September 2024 opening.
- The DfE have informally supported this approach.

#### 5.6.3. Disadvantages

- There may be local opposition to relocating an existing school.
- Consideration would have to be given to support existing pupils to access the new site.
- No suitable school comes forward with an expression of interest.

#### 5.6.4. The preference is to progress Option 3:

- It allows the Glenvale Park school building to be utilised from September 2024 as previously planned.
- The S106 agreement is fulfilled.
- It is the option supported by developers.
- Children from an existing school site will be able to utilise a brand-new building with capacity to expand.
- No other school is impacted by this relocation proposal.
- It enables the Council to fulfil its statutory duties to provide sufficiency of places.

5.6.5 If this option were to be approved, it is imperative that the statutory process as defined by DfE guidance must be followed. Work will commence to plan and implement this in parallel with the expression of interest process.

## **6 Next Steps**

---

- 6.1. If the preferred Option 3 is approved, then the process would be presented to the DfE for their formal agreement to proceed.
- 6.2. Officers from the Council would launch the 'relocation of an existing school' Competition with a view to completing this by October 2023 and returning to Executive in November 2023 for a formal decision.

## **7 Implications (including financial implications)**

---

### **7.1 Resources, Financial and Transformation**

- 7.1.1 Should the preferred option be approved from September 2024, the Council will incur revenue costs in the year of September 2024 opening and in each of the subsequent academic years thereafter for the additional growth, against the 'Pupil Growth Fund' element of the DSG.
- 7.1.2 Depending on the school selected the Council may also incur additional transport costs for a 2-year period to facilitate the relocation of existing pupils. This will be considered and evaluated as part of the analysis of the expressions of interest and included in the Executive Report.
- 7.1.3. There may be some capital investment needed to undertake some refurbishment of the school being vacated to facilitate the repurposing of the building. This will be met from available DfE Basic Needs or SEND Capital Grant as appropriate.
- 7.1.3 It is important to emphasise that if a new school was to open via the FSP process, this too would incur costs against the pupil growth fund element of DSG including start-up costs.
- 7.1.4 All financial implications identified through the expressions of interest received will be included for consideration in the subsequent report to Executive as part of the formal decision-making Process.

### **7.2 Legal and Governance**

- 7.2.1 Legal implications relate solely to ensuring that any initial period of consultation on this matter is conducted in full compliance with the relevant legislation and guidance that govern the proposed amalgamations of schools. The relevant legislative process is detailed in the documents listed at paragraph 8.1 of this report.
- 7.2.2 The statutory process that will be followed by the Council in relation to this proposal complies with all relevant DfE guidance on the subject and legislation that prescribes how school organisational changes of this nature must be enacted. The statutory process is defined in section 7.5.2 of this report.
- 7.2.3 In respect of the Glenvale Park Development and the S106 agreement, the Council has no legal obligation to open the school at any point.
- 7.2.4 It is expected that any expressions of interest would include reference to how any required land transfers would be managed and this will form part of the assessment process with oversight from legal.

### **7.3 Relevant Policies and Plans**

7.3.1 The specific DfE guidance which underpins the process is as follows:

- Making significant changes ('prescribed alterations') to maintained schools Statutory guidance for proposers and decision maker (January 2023) [Section: 'Transfer to a new site' page 17; and Section: Statutory process: prescribed alterations page 35 for the process needed]
- Making significant changes to an open academy - Departmental guidance for all types of academy trust (January 2022) [Section: 'Transfer to a new site' page 28]

### **7.4 Risk**

7.4.1 The risks for this proposal have been explored in full in section 5 of the Executive report.

7.4.2 There may be local opposition to relocating an existing school.

7.4.3 Consideration would have to be given to supporting existing pupils to access the new site.

7.4.4 No suitable school comes forward with an expression of interest.

### **7.5 Consultation**

7.5.1 Although the DfE guidance does not prescribe that a 'pre-consultation' stage is statutory, it does state that there is a 'strong expectation' that any LA would conduct this stage prior to any formal statutory process when making a significant change to a Maintained school or Academy.

7.5.2 If the Executive approve the LA seeking expressions of interest from existing local schools to relocate to the Glenvale Park site, they will be requested to undertake an 'initial consultation' with their school community and to share a summary of the findings.

7.5.3 Further into the process there will be a prescribed requirement to undertake a statutory consultation process for the successful Maintained school or Academy wishing to transfer to the new school site.

### **7.6 Consideration by Executive Advisory Panel**

7.6.1 The Executive Advisory Panel (EAP) Future Communities does not meet until July 2023.

## **7.7 Consideration by Scrutiny**

7.7.1 This report has not been considered by the Council's scrutiny function.

## **7.8 Equality Implications**

7.8.1 An 'Equalities Screening Assessment' has been completed in respect of this proposal.

7.8.2 This report seeks approval to begin the relocation of an existing school process, where any applicants are expected to provide evidence of an initial phase of consultation required by the statutory process governing school organisational changes of this nature. The equality implications relating to this report are therefore limited. No detrimental impact on any protected characteristic has been identified as arising from this proposal.

7.8.3 The school is being built to DfE standards to ensure the widest access to the curriculum and full accessibility for all of the community.

## **7.9 Climate and Environment Impact**

7.9.1 New building regulations ensure that everything is directed at reducing carbon as a standard requirement.

7.9.2 All new builds, including Glenvale, incorporate the following as standard:

- Efficient electrical heating
- Overheating calculations which are now a requirement
- Insulation levels which have been increased
- The Simplified Building Energy Model (SBEM) will require solar photovoltaic (PV) system, mounted on the roof. This is an electrical installation that converts solar energy into electricity.

## **7.10 Community Impact**

7.10.1 This report seeks approval to begin the relocation of an existing school process, where any applicants are expected to provide evidence of an initial phase of consultation required by the statutory process governing school organisational changes of this nature. Any distinct community impact that arises from this initial consultation will be taken into consideration before proceeding with the next stage of the process to make a significant change.

## **7.11 Crime and Disorder Impact**

7.11.1 This proposal will have negligible, if any, crime and disorder impact.

## 8 Background Papers

---

- 8.1 The statutory process that must be followed by the local authority if they wish to progress the amalgamation is laid out in the Department for Education guidance:

[Making significant changes \('prescribed alterations'\) to maintained schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/making-significant-changes-prescribed-alterations-to-maintained-schools.pdf)

[Making significant changes to an open academy \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/making-significant-changes-to-an-open-academy.pdf)

[Free school presumption guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/free-school-presumption-guidance.pdf)

This page is intentionally left blank



# **Proposed relocation of Wilby Church of England Voluntary Aided Primary School to the Glenvale Park Development (new school), Wellingborough**

## **Consultation Analysis Report 2023**

October 2023

# Contents

|   |           |
|---|-----------|
| <b>1. Introduction.....</b>   | <b>3</b>  |
| <b>2. Executive decisions and formal consultation.....</b>  | <b>3</b>  |
| <b>3. How was the consultation promoted?.....</b>   | <b>3</b>  |
| <b>4. How did consultees have their say?.....</b>   | <b>3</b>  |
| <b>5. Number and type of responses received.....</b>  | <b>4</b>  |
| <b>6. What did people say?.....</b>   | <b>4</b>  |
| <b>6.1 Wilby CE VA Primary School relocation to Glenvale Park Consultation Questionnaire.....</b> | <b>4</b>  |
| 6.1.1 About the respondent.....   | 4         |
| 6.1.2 The Proposal.....   | 6         |
| 6.1.3 Positive impacts.....   | 7         |
| 6.1.4 Negative impacts.....   | 8         |
| 6.1.5 Other comments.....   | 9         |
| 6.1.6 Demographic information.....  | 9         |
| <b>6.2 Written responses.....</b>   | <b>10</b> |

# 1. Introduction

The purpose of this report is to set out the proposed relocation of Wilby Church of England Voluntary Aided (VA) Primary School to the Glenvale Park Development (new school), Wellingborough consultation process, and key consultation findings (including an understanding of who participated in the consultation), the results of which will be used in the governance and decision-making process.

## 2. Executive decisions and formal consultation

Consultation commenced 5 September 2023 and concluded on 5 October 2023.

The public consultation was supported by the Council's Consultation and Engagement Team. The structure and design of the consultation set out the proposal and enabled both online and non-digital means of participation, in accordance with nationally recognised good practice.

A paper on the final proposals is scheduled to appear before the Council's Executive on 16 November 2023.

## 3. How was the consultation promoted?

The consultation was hosted on the Council's Consultation and Engagement Hub website. Councillors, local MPs, Town and Parish Councils, partner organisations, voluntary and community sector organisations, and members of both the North Northamptonshire Residents' Panel (circa 625 members) and the Council's Consultation Register were invited to give their views and asked to promote the consultation to their members, or within their local area where appropriate.

Opportunities to take part in the consultation were also promoted in the local media via press releases. The press release went to 26 newsrooms (local, print and broadcast including the Northants Telegraph and BBC Radio Northampton), plus individual reporters and other local news sites. It was promoted through the Council's Leaders' Update, the Council's website, e-newsletters and social media channels, enabling both internal (e.g. staff) as well as external consultees to get involved in the process. The Facebook reach (i.e. the number of people who saw any content from or about the consultation web page) was 1,044; the X (formerly Twitter) Impressions (i.e. the number of times any content from or about the consultation web page entered a person's screen) was 333; and LinkedIn impressions were 277.

In addition to the above Wilby Church of England (VA) Primary School promoted the consultation amongst their school community.

## 4. How did consultees have their say?

Local people, organisations and other interested parties were able to have their say about the proposals in a range of ways, by:

- Visiting [Proposed relocation of Wilby Church of England Voluntary Aided Primary School to the Glenvale Park Development \(new school\), Wellingborough webpage](#) and completing the questionnaire or requesting a paper questionnaire
- Accessing the online questionnaire free of charge at any NNC library
- Emailing [schoolconsultation.nnc@northnorthants.gov.uk](mailto:schoolconsultation.nnc@northnorthants.gov.uk)
- Writing to Consultation: Wilby CE VA Primary School relocation to Glenvale Park site, North Northamptonshire Council, Bowling Green Road, Kettering, NN15 7QX

## 5. Number and type of responses received

During the consultation period, using the various means available to consultees, local people, interested parties and organisations contributed to the consultation 204 times. Nearly all of the feedback received was via the questionnaire, with 202 respondents participating via the questionnaire and two respondents submitting a written response.

Within the questionnaire, respondents could choose which questions they responded to, and so there are lower response numbers to each question when compared with the overall number of participants.

During the consultation period, an interim summary of the consultation responses received were circulated to the project team and all responses received were circulated to decision makers upon conclusion of the consultation to enable them to see each response in full.

## 6. What did people say?

This report is a summary of the feedback received. It is recommended that it is read in conjunction with the full consultation results. The full consultation results have been made available to Members and are available on the [Consultation & Engagement Hub](#).

The following documents were published alongside the consultation questionnaire:

- [Frequently Asked Questions \(FAQs\) document](#)
- [Equality Screening Assessment](#)
- [Equality Impact Assessment](#)

### 6.1 Wilby CE VA Primary School relocation to Glenvale Park Consultation Questionnaire

In total, 202 respondents filled out a questionnaire on the proposed relocation of Wilby CE VA Primary School to the Glenvale Park Development, either partially or fully. Respondents did not have to answer every question and so the total number of responses for each question differs and is shown in relation to each question.

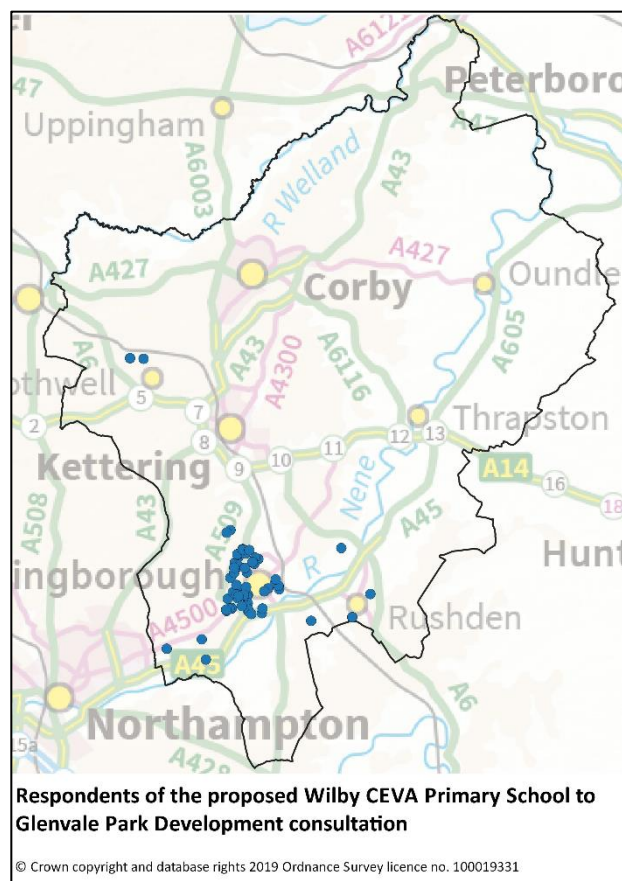
#### 6.1.1 About the respondent

Respondents were asked in what capacity they were responding to the consultation. There were 192 responses to this question, with respondents being able to select more than one option if applicable. The majority of respondents said they were a parent/ guardian/ carer of pupils at Wilby CE VA Primary School (64). The second highest response rate were from residents of Glenvale Park (29), followed by residents of Wilby (26). This was followed by members of staff at Wilby CE VA Primary School (17). The following table details the various respondent types to the consultation questionnaire.

|  | <b>Response number</b> |
|--|------------------------|
| Pupil of Wilby CE VA Primary School  | 2                      |
| Parent/carer/guardian of a pupil of Wilby CE VA Primary School                   | 64                     |
| Member of staff at Wilby CE VA Primary School                                    | 17                     |
| Member of a Parent Teacher Association (PTA)                                     | 1                      |
| A North Northamptonshire Council Councillor                                      | 2                      |
| A Town or Parish Councillor  | 5                      |
| Local resident of Glenvale Park  | 29                     |
| Local resident of Wilby  | 26                     |
| Local business   | 7                      |
| Local community group who uses Wilby CE VA Primary School for running activities | 0                      |
| Member of staff at North Northamptonshire Council                                | 4                      |
| Other (please give details below)  | 47                     |

There were 41 respondents who made comment within the 'Other' text box. Approximately a quarter of these identified themselves as a local residents of either Wilby or Wellingborough. A similar number also identified themselves as a wider family member (i.e. a grandparent or aunt). Other respondents include former teachers/ pupils; educational professionals; respondent from a religious organisation; parents of young children who wish to send their child to Wilby CE VA Primary School; and consultation database panel members.

Individual respondents were asked to provide their postcode to give us an understanding of where respondents live. There were 115 valid postcodes provided for North Northamptonshire. The below map broadly shows where these respondents reside. There was one postcode from outside of North Northamptonshire.



An [equality screening assessment](#) (ESA) was undertaken to help inform the proposal. As the ESA identified a potential impact on the categories Disability and Health & Wellbeing the main body of the consultation questionnaire included the following two corporate equality monitoring questions, which were taken from the Council’s Equality Monitoring Form.

Do you have a disability?

|                   | Response number | Percentage (%) |
|-------------------|-----------------|----------------|
| Yes               | 8               | 5.3%           |
| No                | 129             | 86.0%          |
| Prefer not to say | 13              | 8.7%           |
| TOTAL             | 150             | 100.0%         |

Are your day-to-day activities limited because of a physical or mental impairment which has lasted, or is expected to last more than 12 months?

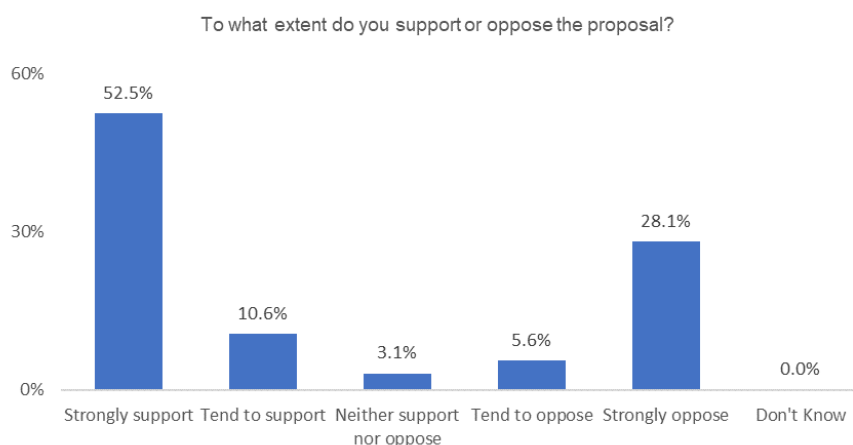
|                       | Response number | Percentage (%) |
|-----------------------|-----------------|----------------|
| Yes, limited a little | 5               | 3.3%           |
| Yes, limited a lot    | 4               | 2.7%           |
| No                    | 128             | 85.3%          |
| Prefer not to say     | 13              | 8.7%           |
| TOTAL                 | 150             | 100.0%         |

### 6.1.2 The Proposal

Respondents were then reminded that the proposal under consultation was to relocate Wilby CE VA Primary School to the Glenvale Park new school building. This means that Wilby CE VA Primary School will be located on the Glenvale Park site, and the vacated smaller school be reutilised for other educational purposes.

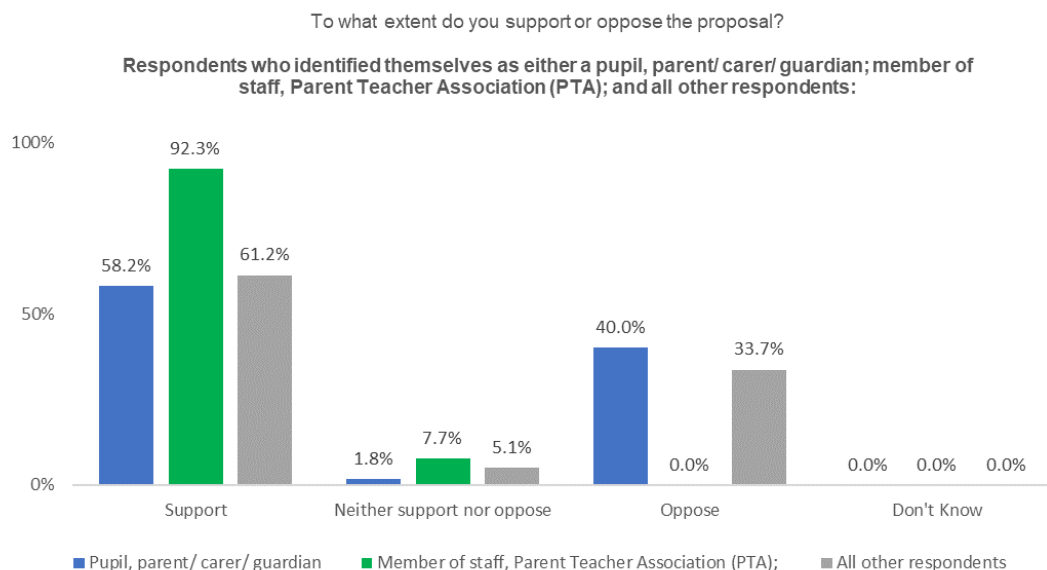
Respondents were then asked to what extent they support or oppose the proposal.

There were 160 responses to this question. Approximately two thirds of respondents (63.1%) said they strongly support or tend to support the proposal, while about one third (33.8%) said they strongly oppose or tend to oppose the proposal. No-one said ‘Don’t know’.



When comparing responses to this question to the different types of respondents we can see that out of the 66 respondents who identified themselves as either a pupil or a parent, carer or guardian of a pupil of Wilby CE VA Primary School, 58.2% support the proposal and 40.0% oppose. Of the 18 members of staff at Wilby

CE VA Primary School and Parent Teacher Association (PTA), 92.3% support the proposal and none of them oppose. Of all the other respondents 61.2% support and 33.7% oppose.



### 6.1.3 Positive impacts

Respondents were invited to share their feedback on why they felt the proposal would have a positive impact. A total of 103 respondents shared their views.

Nearly three quarters expressed their general support for the proposed relocation and welcomed the provision and benefits a spacious modern building and facilities would bring and thought it would provide enhanced opportunities for the pupils to thrive. These respondents felt a more reliable infrastructure and support system would also help the growth of the local community. It was commented by some that they feel the current Wilby primary school is no longer fit for purpose and has restricted facilities for the growing needs of the pupils.

Approximately a fifth of the comments to this question stated that the proposed relocation would provide pupils with more outdoor, communal and/or green space which would enhance physical education.

A similar number of comments felt the proposal would reduce the volume of traffic in the Wilby area and that the Glenvale location provided better parking, for both staff and parents, and drop-off options. Although, there were a small number of comments relating to concerns over transport and/or safe routes to the new school, with one reference to an assurance being made regarding free transport to the school for pupils.

Several respondents thought the potential relocation to an established school would be beneficial in relation to preparing pupils for secondary education, being able to intake all year groups together rather than staggered, and potentially attracting more diverse teaching staff.

A similar number of respondents claimed the potential relocation would support the growth and development of the general Glenvale community, offer opportunities for the community to come together and help house sales in the local area.

There were a few respondents who said the new school building would provide additional facilities for SEN (Special Educational Needs) provisions, PPA (planning, preparation and assessment) time, interventions, meeting rooms, cooking facilities.

A local Parish Council commented its full support for the proposed relocation, following an extensive consultation with Governors and teachers.

There were a small number of comments that there were in fact not perceived positives to the relocation, or comments that were negative; including that Glenvale School was for the Glenvale estate so moving another school is not beneficial; and that some people moved to the estate believing there would be a new school that didn't open so their children now attend a school out of the area.

#### **6.1.4 Negative impacts**

Respondents were then invited to tell us of any negative impacts they feel the proposal may make along with any suggestions on how any potential negative impacts could be reduced or avoided. There were 74 responses to this question.

Almost half of the responses to this question were in relation to how they thought the relocation of the village primary school would impact on the wider community of the village. They felt the potential relocation of the school would take away what was referred to as 'the heart of the village'. It was felt the relocation of the school would impact on the community as a whole and potentially reduce the popularity of the village overall. These respondents also commented on how they preferred the small village school and its link with the nearby church.

Approximately a third of comments related to the additional travel that some parents and children would need to undertake, adding additional vehicles to the current traffic and burden to parents time due to travel logistics.

Alongside this, about a quarter of comments related to concerns regarding the environment with the additional traffic on the road and/or safety concerns for the children, with a perception of no safe walking routes to Glenvale Park from the Wilby area or having young children needing to travel on buses.

Several respondents raised their concerns over future plans and/or the intake process challenges that may occur later for Glenvale primary school. They were concerned there would be oversubscription in the future and Wilby children may be placed in town schools further away. They were also concerned that Glenvale estate children would have priority for the allocated spaces. There was also an indication that by the time the building is ready for intake, there would be enough pupils to initially open multiple year groups on a one form or mixed class entry, which would accommodate families with children of differing ages. This could then increase as the school fills with more children joining the local catchment area to accommodate a two form entry.

A similar number of respondents raised their concerns that the school may prioritise admission on faith and a perception that this would remove choice, with a risk that the diverse local community may be discriminated against.

There were a few comments received about concerns regarding the health and wellbeing of both children and staff, and the impact of perceived disruption the proposed relocation would cause.

A similar number of respondents mentioned the current cost of living crisis and were worried about the additional financial burden new school uniforms and travel would add to some family's outgoings, and how this may be a bigger challenge for some families more than others. There was also one reference to the cost of the relocation of the school on the public purse.

A small number of comments referred to parents who had made a historic choice to send their child to a village school and that choice is now being taken away from them.

There were a small number of additional comments querying where the additional budget for potential school transport would come from when NNC budgets are being challenged; that the new school building could be better utilised for a SEN or secondary school provision. There was also reference to a perceived lack of stakeholder engagement or alternative options considered and mention of a local petition against the relocation. There was a reference to one of the reasons for the relocation being the need for costly maintenance and modernisation but even if the school is relocated and the building utilised for something else, that maintenance and modernisation will still be required.



A few respondents offered suggestions on how any perceived negative impact could be reduced or avoided. These included provision of a shuttle bus from Wilby primary school to Glenvale Park or free school transport and moving the start/end time of the school day to mitigate the additional traffic. It was also suggested that consideration should be given to students already attending Wilby primary school as a core ambassador group to continue the culture of the school and support new pupils. It was said these students and their parents need to be made to feel they belong to the school community. It was also commented that strong communication and transparency between the school administration and Wilby village is vital to address any concerns and maintain trust. It was suggested it would have been better to choose a school closer to Glenvale estate to avoid causing as much disruption. It was also suggested that a one form entry school would have helped the school to reach full capacity.

Some thoughts were also shared on the proposed reutilisation of the Wilby primary school building with a feeling that it should be decided now, rather than later; ideas included using the building for meeting rooms, youth meetings, village shop, and a nursery.

### **6.1.5 Other comments**

Respondents were invited to tell us of any other comments that they had not already shared. There were 51 responses to this question. Responses to this question were mixed.

The highest number, approximately one fifth of responses to this question, shared their positive sentiment regarding the potential relocation.

There were equal numbers of comments, each about one tenth of respondents, regarding the potential relocation being unnecessary or needing reconsideration; expression of a preference for a village school to remain as it is more personable and the relocation would take away choice; concern over the school intake process for the new school with suggestions to delay the intake until the school can be filled from the Glenvale estate or the estate build is complete; concern that a faith school may deter attendance or create bias.

There were a handful of comments expressing concern over transport to the new Glenvale school and whether transport would be provided from Wilby village; how the empty Wilby school building would be repurposed; and what that the proposal might mean for Wilby village.

### **6.1.6 Demographic information**

The questionnaire then invited organisational respondents to provide more detail about their organisation by providing their organisations name and their job title/ role. The two respondents who provided this information identified themselves as a Parish Council and a local Church. We have not listed the job titles/ roles of respondents within this report to ensure respondents' anonymity is retained.

Respondents who were not responding on behalf of an organisation were asked a range of equality monitoring questions to help us understand the characteristics of people who have taken part in the consultation.

Many respondents did not complete the equality monitoring form, although key demographic data was captured within the main questionnaire, as presented earlier within this report. The following is a brief summary of the data received from the equality monitoring form.

More females (55.6%) completed the equality monitoring form than males (44.4%). All of the equality form respondents said they were the same gender as they were assigned at birth. There was a wide breadth of age ranges of respondents, with the age band of 35 – 49 being the most frequent (27.8%).

Most of the respondents identified themselves as being married (77.8%), followed by widowed (11.1%), with divorced and cohabiting both being 5.6%. All respondents who disclosed their sexual orientation said they were heterosexual (100.0%).

Predominantly respondents identified themselves as White British (83.3%), with the remainder identifying themselves as White other and Asian. The most frequent religion identified was Christian (61.1%), with 22.2% of respondents saying they have no religion.

## 6.2 Written responses

There were three written responses received.

One submission expressed concerns over the proposed relocation and felt several issues had not been thoroughly considered. They felt the process had been directed towards confirmation of the proposed relocation, without balance. They questioned the rationale regarding the birth rate of Wilby residents (and other villages in general) and the number and reasons pupils outside of the village attend the school. The response was strongly supportive of village schools and the environment they provide, especially to SEN pupils, and felt the relocation of the school removes the choice for the families who prefer a village school, including those whose children require additional SEN provision. They said the impact of such a change should be fully assessed before any decision is taken.

The second respondent expressed concern regarding a faith school and thought that perhaps a non-faith school would be a better option. They added they had chosen to move to the Glenvale Park community expecting a new primary school, but not a faith school.

The final written submission confirmed a preference for their child to attend Wilby school in its current location, next to the church.

# **Proposed relocation of Wilby Church of England Voluntary Aided Primary School to the Glenvale Park Development (new school), Wellingborough**

## **Consultation Analysis Report 2023**

### **Appendix**

October 2023

# Contents

|  |           |
|--|-----------|
| <b>Proposed relocation of Wilby Church of England Voluntary Aided Primary School to the Glenvale Park Development (new school), Wellingborough .....</b> | <b>1</b>  |
| <b>Consultation Analysis Report 2023.....</b>  | <b>1</b>  |
| Contents .....   | 2         |
| <b>Appendix 1: Questionnaire full results.....</b>   | <b>3</b>  |
| <b>About you.....</b>  | <b>6</b>  |
| More about you.....  | 26        |
| <b>Appendix 2: Written responses .....</b>   | <b>28</b> |
| Feedback received via letters / emails .....   | 28        |

## **Appendix 1: Questionnaire full results**

### **Proposed relocation of Wilby Church of England Voluntary Aided Primary School to the Glenvale Park Development (new school), Wellingborough**

#### **Overview**

This formal consultation is about a proposed primary school relocation opportunity to move into a brand-new school building.

Following North Northamptonshire Council receiving two completed expressions of interest applications to relocate, the Panel met following a robust interview process and recommended that Wilby CE VA Primary School relocates to the Glenvale Park site.

Further information about the Panel: A panel was convened to conduct a robust interview process with the schools who had completed an expression of interest. This process included a presentation to the panel from each school. The panel was made up of voting and non-voting members. A scoring system was used to assess the expression of interest, presentation and interview. All panel members asked questions during the interview and presentation process. Voting panel members made the final decision regarding which school they would be recommending to relocate to the Glenvale Park development.

The panel was made up of the following members:

#### **Voting members**

- Cllr Scott Edwards - Executive Member for Children, Families and Skills
- Neil Goddard - Assistant Director Education
- Claire Shortt - Headteacher Broughton Primary School

#### **Non-voting members**

- Jo Hutchinson - Head of School Effectiveness
- Cllr Scott Brown - Ward Councillor for Glenvale Park, Wellingborough
- Cllr Clive Hallam - Ward Councillor for Glenvale Park, Wellingborough
- Cllr Lora Lawman - Ward Councillor for Glenvale Park, Wellingborough

#### **Wilby CE VA Primary School:**

- Provides education for children aged 4 to 11 years
- Wilby CE VA Primary School is a Church of England village primary school located in the village of Wilby
- The distance from Wilby CE VA Primary School to Glenvale Park development is 2.4 miles
- The vast majority of pupils reside in Wellingborough
- Wilby CE VA Primary School is a Local Authority Maintained School
- Wilby CE VA Primary School currently has a Good Ofsted rating

#### **Background**

The Glenvale Park site is located in Wellingborough, to the north of the town. Once complete there will be circa 3,000 homes. As part of the infrastructure and Section 106 (S106) proposals for the Sustainable Urban Extension (SUE), a 2-form entry, 60 places per year group, primary school was proposed to meet increased demand and serve the local community. The school building construction completion date is August 2023.

## **Wilby CE VA Primary School:**

- Provides education for children aged 4 to 11 years
- Wilby CE VA Primary School is a Church of England village primary school located in the village of Wilby
- The distance from Wilby CE VA Primary School to Glenvale Park development is 2.4 miles
- The vast majority of pupils reside in Wellingborough
- Wilby CE VA Primary School is a Local Authority Maintained School
- Wilby CE VA Primary School currently has a Good Ofsted rating

## **Background**

The Glenvale Park site is located in Wellingborough, to the north of the town. Once complete there will be circa 3,000 homes. As part of the infrastructure and Section 106 (S106) proposals for the Sustainable Urban Extension (SUE), a 2-form entry, 60 places per year group, primary school was proposed to meet increased demand and serve the local community. The school building construction completion date is August 2023.

Further information about S106 funding: Under S106 of the Town and Country Planning Act 1990, as amended, contributions can be sought from developers towards the costs of providing community and social infrastructure, the need for which has risen as a result of a new development taking place. This funding is commonly known as 'Section 106'.

As part of the annual strategic Pupil Place Planning exercise undertaken in January 2023, it became clear that, due to demographic changes, there would be insufficient demand to support the school opening until September 2025 or beyond.

Based on this position work has been undertaken to assess the options for the new school to ensure:

- The local community has access to sufficient school places
- No schools are disadvantaged
- Available assets are used as effectively as possible

## **The Proposal**

This consultation seeks your views on the proposal that Wilby CE VA Primary School relocates to the new school at Glenvale Park, opening at the start of the new school year in September 2024. There will be no change to the current arrangements regarding the provision of SEN places at Wilby CE VA Primary School.

## **What is the relocation of an existing school?**

A relocation of an existing school to a new school building means that the whole school including all children, all staff members and all fixtures and fittings and resources will be relocated to the new school. This move will be planned and managed to ensure that there is no disruption to learning.

## **Advantages of relocating an existing school**

- There is no need to create additional capacity
- The relocated school will not impact on other schools
- Relocating an existing school can be delivered relatively quickly
- If approved by the North Northamptonshire Council Executive, it will be ready to open by September 2024
- The school will bring with it all year groups, rather than filling from year R upwards as would happen for a new school

- Children from an existing school site will be able to utilise a brand-new building with capacity to expand
- The vacated site can be reutilised for other educational purposes
- A new and purpose-built facility supports improved outcomes for all members of the school community
- It enables the local authority to fulfil its statutory duties to provide sufficiency of places
- The Department for Education (DfE) support this approach

### Risks of relocating an existing school

- There may be local opposition to relocating an existing school
- Consideration would have to be given to support existing pupils to access the new site

For further information please read:

- [Frequently Asked Questions \(FAQs\) document](#)
- [Equality Screening Assessment](#)
- [Equality Impact Assessment](#)

### Timetable and next steps

| Stage | Description  | Timescale                      | Comments  |
|-------|--|--------------------------------|---|
| 1.    | Representation<br><br>(Formal consultation period) | 5 September – 5 October 2023   | Representation for a period of one month                                    |
| 2.    | NNC Executive                                      | 16 November 2023               | Decision on Wilby CE VA Primary School relocating to the Glenvale Park site |
| 3.    | DfE relocation process                             | 17 November – 17 December 2023 | Making a significant change to a maintained school process                  |

### Have your say

Please share your views by completing the questionnaire below. All views submitted during the representation period will be considered, including all support for, objections to, and comments on the proposal.

Your feedback will be part of a report with many other people's feedback, so you will not be personally identified.

You can also access this online questionnaire free of charge at any North Northamptonshire Council library. Please see the [Library website](#) or telephone 0300 126 3000 to check opening times.

Alternatively, you can email or send your comments in by post via the contact details below.

If you have any queries, comments or would like a copy of this questionnaire in another format (including paper, easy read or large print) please contact us.

**Email address:** [schoolconsultation.nnc@northnorthants.gov.uk](mailto:schoolconsultation.nnc@northnorthants.gov.uk)

**Postal address:**

Consultation: Wilby CE VA Primary School relocation to Glenvale Park site  
North Northamptonshire Council  
Bowling Green Road  
Kettering  
NN15 7QX

**This consultation will run from Tuesday 5 September 2023 to midnight on Thursday 5 October 2023.**

Thank you for helping us by completing this questionnaire.

For information about how consultation and engagement responses are managed, please see the [consultation and engagement privacy notice](#).

## About you

**Q. Are you:** Please tick (✓) all that apply

There were 192 responses to this question, with respondents being able to select more than one option if applicable.

|  | Response number |
|--|-----------------|
| Pupil of Wilby CE VA Primary School  | 2               |
| Parent/carer/guardian of a pupil of Wilby CE VA Primary School                   | 64              |
| Member of staff at Wilby CE VA Primary School                                    | 17              |
| Member of a Parent Teacher Association (PTA)                                     | 1               |
| A North Northamptonshire Council Councillor                                      | 2               |
| A Town or Parish Councillor  | 5               |
| Local resident of Glenvale Park  | 29              |
| Local resident of Wilby  | 26              |
| Local business   | 7               |
| Local community group who uses Wilby CE VA Primary School for running activities | 0               |
| Member of staff at North Northamptonshire Council                                | 4               |
| Other (please give details below)  | 47              |

Other:



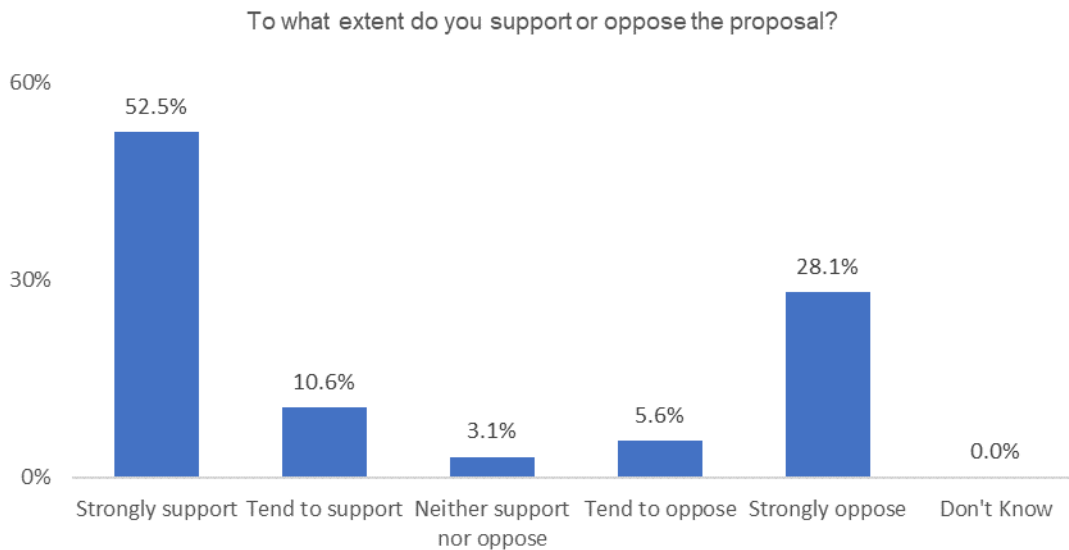
- Churchwarden of a Church of England Church in North Northamptonshire and former member of the Peterborough Diocesan Board of Education
- Wellingborough resident
- Was hoping to send my son to Wilby primary school
- Local resident of Wilby Way estate. Also retired teacher and head teacher
- Have two grandchildren who attend Little Harrowden School
- Parent of former pupils of Wilby CE VA School
- Vicar for Glenvale Park
- Concerned taxpayer
- member of CET Panel
- Grandparent of child residing in Glenvale
- I stay next to glenvale park. Myvkiid is 5 yrs old
- Panel member
- Parent of children once at Wilby School.
- Local resident
- Local resident near Wilby
- Wellingborough resident and former Teacher-Librarian
- Have two grandchildren who attend Litte Harrowden School
- Educationalist
- Grandparent of pupil
- Former pupil and former governor
- Parent & Vice Chair of Governors
- Resident of Wellingborough with experience of Wilby School (former staff member) & use of the School as a Community Facility
- Retired Preschool Manager
- Local resident near Glenvale park
- Parent of child due to start school Sept 2024
- Family member
- Grandparent of children at the school
- Grandparents of some children in the school the
- Local resident of Gleneagles Estate
- Family member of pupil at welby
- Curate (trainee vicar) at the local church for which Glenvale Park is part of the parish
- Auntie of two pupils at the school
- Auntie
- Local resident in Wellingborough
- Resident of Wellingborough
- Former school governor/chair of governors
- Parish Clerk. Wilby
- Potential New Pupil of Wilby CE VA Primary School
- Wellingborough resident
- Advisory Board Member Healthwatch North and West Northamptonshire, Elected Governor Kettering Hospital
- Aunty of children atltending the school

## The Proposal

Respondents were then reminded that the proposal under consultation was to relocate Wilby CE VA Primary School to the Glenvale Park new school building. This means that Wilby CE VA Primary School will be located on the Glenvale Park site, and the vacated smaller school be reutilised for other educational purposes.

Respondents were then asked to what extent they support or oppose the proposal.

There were 160 responses to this question. Approximately two thirds of respondents (63.1%) said they strongly support or tend to support the proposal, while about one third (33.8%) said they strongly oppose or tend to oppose the proposal. No-one said 'Don't know'.



**Q. If you think the proposal will have a positive impact, then please tell us why here:**

There were 103 responses to this question.

- I have 2 daughter who in a few years time will be going here and i think having an established school with experienced staff is good rather then creating a new school and staff from scratch
- Only positive is the parking at school open and close times will be removed from Wilby but will then be moved to Glenvale to deal with.
- Four a family of three without a car, this will mean I have to either find another school or find another means of transport.
- More space for the children
- I think the school could provide a great facility FOR THE COMMUNITY IT WAS BUILT. This was not the community of the village and Wilby and homes local to Wilby. The proposed school was built for pupils living in the Glenvale estate area, which is not close to Wilby.
- The new school will be in a modern building with modern facilities
- The children do not have enough green space or play space at Wilby, it is also a changing world and more and more educational special needs are being noticed and I believe in the best interest for the children and teachers to have better space available for learning and meeting the demands of those with additional needs. There is less impact on the village traffic.  
I understand emotion attached due to the age, but having previous family that attended the school over decades is not a reason to stop the move that will benefit the children's well being. For me personally it will make school run a few minutes longer , but the great satisfaction that my child will be supported and taught in a better environment. The children cant take the building but they cant take the values and everything that Wilby CEVA has become.
- Wilby school is no longer fit for purpose. Too small, not enough facilities.

- This relocation will be excellent for the pupils and staff of Wilby given the increased space and access to up to date building and facilities. There are also many families on Glenvale Park who moved there hoping they could send their children to their local school. Relocation also means that all classes can be made available from the outset, rather than opening it up to reception then year 1, etc as the years go by. This means families can send all of their children to the same school. Having the school open as early as possible will also help sell houses, it will help continue building community and be a place where people can meet.
- Because the school had lack of resources it will open it up for the children to gain more experience
- Wilby primary schools current building has a long history however education has moved a long way since the original guise of the 'village school' . I [redacted] and at that time (1980's/ 90's) was largely attended by village children with only a few living in surrounding outskirts of Wilby. Thus parking wasn't an issue and neither were the roads heavily congested. Not only this education was largely in the classroom delivered by one teacher. Classes were smaller than current classes and the layout of the school dramatically different. There was a larger playground which has been used in the development of the school. Education in the current format means more interactive environments, differing leaning and teaching styles, more use of electronic resources and the widely different abilities and needs of children and the current school is sadly lacking in space ( both indoor and outdoor). The children desperately need more outside space and communal areas to be able to safely gather together and to also receive much needed physical education. currently wet weather means that pe lessons and lunchtimes are held in cramped classrooms or a hall that offers little space. There needs to be a better thoroughfare of the school , more spaces to be able to offer extra assistance , breakout areas and to generally be more of a whole school community. Whole school assemblies, plays, school functions are just not possible in the current building. The traffic on Mears Ashby road/ church lane is frankly dangerous. One child already recently hit by a car. There is no crossing area and when 95%of the school children arrive in a car the village road just isn't appropriate for the level of traffic. Safety wise this leaves me very concerned .  
Whilst I appreciate the history of the school times have progressed and the school community should embrace this opportunity.
- Wilby school is not fit for purpose anymore. There is nowhere for sen children to go when they need time away from their class. There is no green space for children to play.
- I hear wilby is a good school and cares alot for it pupils. We need another educational setting like that in our area
- Think more money time can be spent in one place more facilities
- Children are restricted in a number of ways at Wilby, the school has not been fit for purpose for many years. Too small, no playing field, cramped classrooms, small playground etc etc.
- Wilby school is no longer fit for purpose. There is no outdoor space and indoor space is very limited.Children are driven to school and parking by parents can sometimes be dangerous
- Present school is not fit for purpose. It is far too small and has no outside space. The location means that cars are parked dangerously for drop off and pick up. Most of the pupils come from Wellingborough in cars.
- Current school not fit for purpose. No outside space, crapped inside space. No parking for staff or parents.

- [redacted] I have noticed that there are far too many cars that need to bring and fetch the pupils. The area isn't suitable for this, and with double yellow lines due to be installed parking will only be worse.
- Traffic and parking in Wilby will reduce and make the village much safer for both vehicles and pedestrians
- This will cause issue in the latter, we have built a new housing area equipped with a new school for the additional homes being built. How will moving another school into this location help?
- None!!
- It seems that the planning so far is excellent, and it seems to be a wonderful solution, especially if the school in its current location is not demographically feasible for the future.
- None it will be a negative impact, particularly the village of Wilby
- It will be a fantastic opportunity for the children to have so much space to learn in.
- Larger space for children to comfortably and safely work  
Lower running costs  
More reliable infrastructure  
Own green space
- The School currently suffers from cramped conditions which have already been expanded to their maximum capacity. The relocation to new purpose built School would offer all Pupils & Staff a much enhanced environment in which to provide an educational experience.  
A secondary benefit would be the elimination of severe traffic congestion on adjacent roads at school arrival and leaving times.
- Moving to a new building with new infrastructure and equipment will be a huge benefit to all pupils learning. Having more space to learn and play will be a great advantage to every child.

Also the roads around the current school are just not designed to accommodate so much traffic. Moving to the new site will have a positive impact on local residents who have problems with traffic at school times.

- School is too small. Time for a change, kids need more facilities.
- The school building is old and the playground is small. Children need space to play and do sports. The classrooms are small too.
- All year groups can be catered for
- The school building should be used for the local community and to boost the opportunities to the existing school going into it.
- Current school buildings are unfit for purpose resulting in daily challenges. Both children and staff deserve the huge benefits that will result from the relocation to a new purpose built site. consideration will need to be given to how the Wilby children reach their new school.
- Having visited the school and seen first hand the constraints imposed by the ageing building with all the attendant very costly maintenance issues, I can fully understand why this proposed move to a new building is so attractive.
- I think it would be positive for the right school. I believe Wilby is too small and far away and that this would have been a better opportunity for a different school.

- I consider it a wonderful opportunity for the current pupils of Wilby. There will be more suitable facilities as it is a school built with the consideration of the current demands of education, rather than the education system of the 1800s.  
Most importantly for me is the space the children will have to play. The current playground at Wilby is tiny and there is no realistic way the school grounds could be extended other than relocation.  
I think it is an exciting opportunity and I strongly support the move.
- Many of us [redacted] did so on the basis of the school and the other amenities we were being given. [redacted]. This estate needs a school the residents can use and although I'm not sure [redacted] to be able to walk their children to school and nursery as originally promised!
- The building has been constructed with the intended purpose of allowing student entry as early as possible despite there not being an immediate demand and, it would be a shame for the majority of the building to remain unused. Many residents who may have moved to the Development as a primary school for their child being on the doorstep appealed to them. [redacted]
- The new school will have
  - (1) Bigger brighter classrooms
  - (2) Larger, safer outdoor areas and sports facilities
  - (3) Rooms to carry out interventions with unruly or struggling children
  - (4) Modern toilet facilities
  - (5) As a new build, it should have a lower carbon footprint and be more environmentally friendly
- Having extra space for me is a huge plus. [redacted] and I think having a higher playground will be a huge benefit for them. I also think this move will create greater opportunities for them.
- The current building needs a lot of work on it and has no opportunity for expansion. The new building will provide great space including external space. Great opportunity for recruitment too.
- Better facilities and opportunities for children
- I don't see any positives about a Christian school on sight
- Don't see any really
- There are no positives at all
- Taking a wider view – [redacted] - the current facilities at Wilby whilst much improved are not really fit for purpose in terms of being able to offer pupils the best in terms of what is currently on offer in today's facilities.
- Opening of primary school to all years from September 2024 to support families with children of different ages.
- Pupils will have more space both in classrooms and outside to learn and play in a modern environment that is purpose built to meet their needs. The current Wilby school building has been outgrown for several years, is in urgent need of major updating and repair and the playground is also far too small for the number of pupils. Relocating to Glenvale Park will in my opinion be a fantastic opportunity for the children, staff and parents.
- Great to have a local school use the new building
- I think it'll be great for a local school to make use of the new building and facilities
- [redacted].
- Fresh start, better and more productive site in a purpose built school, increasing productivity and resources/capabilities for kids

- A move to a larger setting will provide an opportunity for the growth and development of our Wilby School community. The current building does not provide adequate space for varied learning and outside space is extremely limiting for active learning or sports activities. It requires improvements and modernisation and there is no available space for further development. The lack of facilities such as quieter areas/space for 1:1 work, small group work or interventions has an impact on our pupils.  
A larger setting that is purpose built for the expectations and requirements of a modern and demanding curriculum would help us better meet the needs of all our pupils.
- Hopefully local kids will be able to join the school
- New facilities would be great and just to have an outside green space! Whilst our current building is lovely, more space would be wonderful and more up to date facilities with perhaps a computer suite. Ideal opportunity to move as a 'family' together with a majority of our children coming from/being driven in from Wellingborough anyway.
- The Glenvale site will enable the children to have more outdoor space in which to play and participate in outdoor sport more easily .It will also facilitate the growth and development of the school .
- It will give: more outside space; better learning spaces; a more organised layout; a great focus for families in the new estate the new building is found in; a better representation of the current catchment of the school, many children already travelling into Wilby;
- It will be a fantastic opportunity for the whole school community.  
The children will have space to be able do PE.  
They will become part of a community that will take an interest and work alongside them.  
The current school is old and in need of repair.
- Children will have easy access to grass land and appropriate space and areas to complete learning such as geography, science, and PE. Possibilities of purpose built areas to support learning such as PPA, interventions, meeting rooms, cooking facilities.  
Overall space and greater opportunities will be provided impacting all areas of children's development and learning.
- The school is struggling for space and the children and staff work in limited space within the classrooms. Parts of the building are in need of repair and going to a new building with up-to-date facilities, will provide the children with a more rounded and comprehensive experience. We do not have any green area at the school and [redacted]. [redacted] Our technology set up and the technology available to the children is becoming out-dated and being able to use faster and more up-to-date equipment will improve their learning experiences. There is concern that the school, over the years, will not be financially viable as more and more money will need to be spent on it to keep it up to a good standard.  
There is no area to be able to expand, due to a planning application being turned down in the past. Many of the children come from Wellingborough and therefore this will assist in the transition to the school in the town. There is limited parking for the staff and during drop off and collection times, the street can become dangerous with some many cars in such a small area. This also impacts on the people living on the street, who also need to park.
- Children will have better opportunities to learn, grow & thrive in a location suitable for young development
- There will be more space for the children, larger playground, green areas, the building will be structurally sound. The new school will be a far better environment for the children to learn and thrive in.

- It will open up opportunities for both education and extra curricular possibilities that the current site doesn't offer.
- Larger outside area and more up to date facilities
- More open space for the children to play and better learning spaces
- Wilby, although an amazing school, it doesn't have the space and facilities for our children. I feel them moving to a bigger school will give them opportunities they can't have at Wilby, due to lack of space. [redacted]. Wilby school isn't so much about the location, it's the teachers and the students. But, with moving it to a bigger, newer premises, the children's opportunities will be endless! I am very excited.
- More room for the children to play, and better environment for learning
- Children will enjoy having a big playout area plus not having to share two classes in one class.
- New resources, more green space, prepare children for size of secondary school more effectively

- Better facilities for my child

PE is a big struggle at current site

Modern purpose built facility is a massive advantage over current site

Ability to attract more diverse teaching staff and to expand numbers

- The present school is cramped and in poor overall condition. The staff do their utmost to provide the best education possible for the children. The move to a brand new school with space, proper playgrounds and well equipped classrooms will provide a huge boost to the standard of provision. As I see it, the Governors, Staff, Parents and Pupils are extremely keen that this move should take place.
- A modern and up to date building for children to learn
- Providing new and better facilities for pupils and staff at the school
- The bigger environment will give children and teachers a greater amount of freedom. A greater area will allow teachers to be able to hold activities outside and not be restricted by size constraints. The bigger school will also help children better adjust ready for when they go to the large secondary schools in the area.
- Better facilities for the children.

Wilby is a lovely little school but feel as with a lot of things, things develop and needs are greater (eg technology, car parking spaces )

- More space
- New facilities, more space for the children to thrive. Less children per class with no shared year classes hopefully.
- It will be good so we can have a better playground and new computers.
- [redacted] The SEN support is limited for space if children need a sensory break or time out. Better resources are needed for SEN children.
- The school as lovely as it is was built over 100 years ago and the needs of today are a lot different to then.
- More space, better facilities

- I think this is a fantastic opportunity for all the children to learn in a bigger, more suitable environment. It will allow them to flourish in an improved education setting
- Our current building is outdated and there is no funding to make repairs. We have limited space inside and outside the building and no green space.
- Having spoken to parents of children currently at Wilby School, I think this proposal will greatly benefit school students who are currently learning in a less than adequate building space. They have the chance to move to a brand new building that is much more fit for purpose. The school will also be a central aspect of the new Glenvale Park community and will contribute to that locality being able to thrive.
- The current school is, in my opinion, "past its sell-by date". It was once an old fashioned village school, going back well over a hundred years, and I cannot see how it can be fit for purpose in 2023. It does not have the space, facilities or position to continue as a school for our young children. The new offering is clearly of modern design and (should) have all the facets to provide a good education to a diverse group of children.
- Make it easier for the children in Glenvale Park to access a school within walking distance. Also existing children from Wilby will benefit from a brand new school with better resources.
- A very positive impact will be the result of the move. The children will have access to education in a building fit for purpose. The present facility is cramped, very old, too few suitable areas for play and physical activity. The teachers will have greater access to the wider network to support their pupils. The building is modern and purpose built leading to happier and more successful teaching and learning.
- Children health and well-being are at stake here.
- It will be good for the school building to be utilised instead of sitting vacant for another year. It will also be beneficial for those parents with children of other ages to be able to start immediately.
- Giving the pupils access to better and up to date facilities
- This would be a great move for the pupils of the school
- Wilby school has an excellent curriculum and I think a relocation would benefit them and their students as their current facility could do with improvements
- I believe it would go towards the development of a community on Glenvale Park. Provide current & future children of Wellingborough with a beautiful environment in which to learn.
- The present school building is not fit for purpose. It is too small for the number of pupils. There have been safeguarding risks that have been difficult to mitigate without putting other pupils and members of staff at a disadvantage. There is insufficient space for children to exercise and enjoy recreational time. The flow and parking of cars has caused aggravation to residents in the area.
- Wilby Parish Council is in full support of the proposed relocation of Wilby C of E Primary School to a new purpose-built facility at Glenvale Park at the completion of the current school year.  
This decision, which is unanimously approved, follows consultation with Governors and Teachers, including a fact-finding visit by a majority of Members to the School to see a typical school day in action.  
They were struck by the challenges being faced daily, caused by the restricted site, and the ongoing maintenance needs of an old deteriorating building, where there is also insufficient space. Funding to merely address some of these problems, without delivering any pupil benefits, is prohibitive. Put simply, the current site is not fit for purpose.  
The children deserve so much better, and it is acknowledged that the proposed relocation is an opportunity to resolve all the current challenges through the provision of an ideal environment for them to grow and prosper.



- [redacted], I am supportive of the relocation. [redacted]. I am absolutely aware of the challenges the current building gives to the hardworking staff of the school. It is not fit for purpose for modern schooling, the site is too small, is dilapidated and would take significant investment to make it safe and even then, would have many issues that all the money in the world would not solve. The opportunity for the children and staff to relocate to a modern, purpose build facility means that on this occasion I must allow my head to rule my heart and accept that this relocation is in the best interests of all concerned. There is both local support and opposition to the relocation, as one would expect, however I note that the Village Parish Council have take the decision to unanimously support the relocation. I would like it on record that I trust that the academy will make good their assurances to provide free transport to those children from the village, to Glenvale Park for the duration of their education.
- [redacted] and the biggest problem was having no green space. Also, the playground, hall and classrooms are far too small.  
Additionally, there is not enough parking as the majority of the children do not live in Wilby.
- Wilby School facilities are far too small, so not fit for purpose. [redacted] and the new generation of children deserve much bigger and better facilities, including green space.  
With just a small amount of children from Wilby village going to the school this is a fantastic opportunity not to be missed for their education and social skills. With more and more children coming from surrounding Towns/Villages the consideration for the residents are none existent.
- No
- [redacted] and 9 pupils in my class of 13/14 came from Wilby Village, which is a massive difference to date. The parking around Church Lane and Mears Ashby Road are highly impacted with the vast majority of the children not living in Wilby. From my experience I missed the lack of green space, also the playground and hall are too small.
- bigger space
  - \*new technology
  - \*more facilities
- lii
- A far better, newer faculitie can only be of benifit

**Q. If you think the proposal would have a negative impact, please tell us why, along with any suggestions on how any potential negative impacts could be reduced or avoided:**

There were 74 responses to this question.

- [redacted].  
I am concerned about school transport [redacted] commitments and no transportation for children has said to be provided.  
[redacted] The route to the new location goes through 3-4 traffic congestion points between Wilby and Glenvale so this congestion will be significantly added to.  
Wellingborough NEEDS Sen schools and Secondary Schools NOT another primary school.  
Wilby school is a village school. The number of families who choose THIS school each year continues to be popular. I know of families every year whose children have not successfully been accepted into the school so the school is popular and relevant.  
People WANT a village school setting. People have chosen this school because of

what it is, because of what it offers. It is small and it makes the school community a family with excellent one to one teaching.

The village preschool will be significantly affected as their numbers will decrease due to the loss of the primary school.

Village house prices will decrease and less families will move to the village.

The village has nothing but public houses and a garage. The school is the heart of Wilby village. It brings people into the village, the school also uses the church and keeps that open and keeps families attending. With the loss of the school, the church, the preschool and the Wilby playing field's playground will all be affected negatively.

The children at the school are settled and are happy with their teachers and their setting. [redacted] It is not fair on children physically, emotionally and mentally to have so much upheaval caused by a move in schools.

Not ALL children will be able to make the move, not ALL teachers/staff will be able to make the move or be kept on and this will also affect the children dramatically.

It is unfair on families in the village to remove their village school, as many have moved here with the intention to attend the school when their children are old enough. There is NO other school within reasonable walking distance from the village and NO SAFE route to the closest school either.

The Economic aspect of moving the school to glenvale is disastrous. There is no walking options whatsoever to get to Glenvale so EVERY parent would HAVE to drive there, therefore raising pollution levels and MORE costs onto parents for petrol, transport costs etc. A disgusting effect to add to the already unhealthy deteriorating town of Wellingborough.

If transport would be provided I would NOT be happy putting [redacted].

It is disgusting to have this facility removed from the village and it's residents.

The school has been fit for purpose [redacted]. [redacted] [redacted] and the school have been so supportive and their safeguarding procedures and policies have been absolutely critical. Without this small family style type network and the school being moved to bigger premises and more numbers of children/larger classes I don't think that [redacted]

[redacted] [redacted] There has NEVER been any road traffic accidents involving a child [redacted] There has NEVER been any incidents with children being approached by strangers on foot or in a vehicle.

The school is NOT over looked by any of the local properties so no one can watch the children with any inappropriate intentions. Not many other schools in this area can say the same.

This school is NEEDED.

This school is SAFE.

This school is RELEVANT.

This school is OUR school.

This school supports the village and is an essential part of the community  
WILBY PRIMARY SCHOOL NEEDS TO STAY IN WILBY VILLAGE.

- Children learn in various environments you are taking away choice from parents and children. Not all children thrive in a large school is daunting and scary and disadvantages learning.
- [redacted]
- it will be unsafe for families and children to get to the new location as there is no way to walk there unless a walking route is provided. Also if the only way to get there is by car what about the parents without transport? It will also add to the traffic volumes on Park Farm Way which is already a race track! and almost impossible to cross at peak times.
- People will be put of moving to wilby with no school within walkable distance ,it will take the heart of the village away.
- [redacted] I oppose this move [redacted]

- [redacted]
- Wilby school has been around such a long time a town and village will lose and important part of itself! The children and parents all love Wilby school and the size of it! If people wanted to send their children to a big mainstream school they would have from the start! Smaller classes have more resources and they support the children's need! Wilby school should be left as it is! Glendale park was and is unnecessary!
- It will massively impact the children currently at Wilby, a change like this could disrupt the rest of their school experience and be a huge change for kids who already struggle with change. This school has been around for many years and is a huge part of Wilby's history and family history.
- Wilby school is a thriving part of the community of Wilby and serves its community well.

Wilby school is located in the heart of the community it serves.

Any pupils from Wilby attending the new school will have to be driven to school as it is a) too far for them to walk and b) there is no safe footpath for them to use. You cannot even safely walk out of Wilby to get into Wellingborough without negotiating a fast four lane road. This issue raises questions about equality of access eg what happens to children whose parents cannot drive them to school perhaps because they do not have a car or cannot afford to pay for the fuel needed? What about the environmental impact of parents being forced to drive their children to school? If transport is provided who will pay for it when council budgets are being squeezed?

In the longer term where will pupils from Wilby village go to school when there is more demand for places from children living on the Glendale Estate? One can envisage children from Wilby having to attend town schools. Once the school has been moved from the village the facility will be lost forever.

Wilby school provides education in a small village setting which suits many primary age children - the new school will be much larger - bigger is not always better.

- The village will no longer have a small village school. Pupils will be in larger cohorts and further away from home/ base peer group or catchment area. They will be increased traffic to and from Glendale park. Pupils will be placed amongst Glendale park families too so competing for places. The proposal will increase capacity but not on top of existing places as Wilby school will be lost, reducing numbers
- The impact on the village will be negative as villages need schools to survive as communities. Otherwise Wilby will just become a suburb of Wellingborough. The families who live there nearby will need to travel by car, which will not help towards our net zero target. Many families already travel to the school by car because of the lack of a safe crossing over the A509 at the Sainburys roundabout. [redacted] I know that parents will choose a village school over a town school. This may be because it feels like a family, or it may be because their child has particular needs that may be overlooked in a larger school. By moving Wilby School to Glendale Park this choice is being denied and a school which has been part of the village will no longer exist, along with the village shop and other facilities.
- There are very few community facilities in Wilby of which the school is a most significant one. To remove the school from the village will, in my opinion, have a serious impact on the village community.
- The proposal would put children under unnecessary stress from having to move to a new building, and new area. Particularly those who struggle to settle in. Furthermore many of the school children live nearby, so moving to a completely different area would result in transport issues. Lastly, a lot of parents chose the school for its small size and location in a quiet village. The proposed new building is near a busy road, surrounded by ongoing construction works.
- Glendale Park is in the middle of nowhere, how will children get there. I feel this is not a page move for the poor Wilby children who will have to travel over long empty distances through industrial parks. What could not go wrong. This will lead to more children not attending, accidents, health and safety issues.

- As a resident I am concerned that the proposal to introduce a school that priorities the admission of children of a single religion would discriminate against those on the estate of other or no religion. If the admission policy is changed to no longer priorities children of COE faith I would have no problems with it
- The village Community School will be lost with no educational needs being met for Wilby. In my opinion Wilby will be encompassed with Wellingborough and with the possibility that the village nameplates replaced with Wellingborough. In the opening statement the school will be reutilised for other educational needs, I believe that this should be identified at this time otherwise the school building may be redevelesidential purposes.
- My greatest concern, [redacted] is the religious preferences around entry. This is a very diverse neighborhood and I believe the school grounds within should reflect that so I am very against wilby's current policy of preferring children of the Coe faith over those with proximity to the school [redacted]. The same story applies to his school friends that live here, the come from Islam, sheikh, Hindu, agnostic and atheist families they should not be treated less preferably to any other prospective student
- If the admission policy is based on CofE religious leanings, this may well discriminate against children brought up in other faiths or no faiths.
- Glendale and adjoining areas are a diverse community. A faith school in such diverse community is almost akin to discrimination. I would like a school that respects and upholds diversity instead of one faith over other.
- What affect it will have on the village
- This plan effectively involves closing down a village school. Calling it 'relocation' is stretching the term as students will have to travel 2.4 miles to school. Those who are local to Wilby and west Wellingborough will not be able to walk or to make their own way to and from school. Travel by car will be required. The school at Glendale Park may be nice but it does not make up for the loss of a village school in a completely different part of Wellingborough. The village of Wilby will, as a community, lose out.
- Changing location on the school van cause a disruption with friendships and school staff and the wider community. It will also cause more disruption to the roads during school drop of and pick up times.
- It takes away the village school life. [redacted] and this will be lost going into a bigger school
- Plan is not future focused. At some point in near future there will be a demand for more school places with all the building that is going on in and around the area. By proposing to move Wilby CE VA primary and closing their current building you are losing all that schooling space. Your proposal says that the Glendale school won't have enough demand until 2025, that is not that long away. And what will you do when the demand is there from families in these developments but you've already filled the new school with an old school.  
Plan seems short sighted.
- It's a village school needs to stay its in good area .it would mean small children having to travel and lose the village atmosphere. Later when glenville needs to start admitting children it would be over subscribed. .bad idea
- This will not aid the amount of residential homes being built in the area. Also will NNC fund the transport cost for the children who aren't able to travel to the new location. We need to ensure that this will not impact the budget of NNC and all boroughs.
- Wilby School on it's present site has so many advantages for the current pupils. The school is right for children that require smaller classes ( I believe that is why parents chose this school as 1st place & then others choosing to move their children here from other local schools to Wilby.) Many of them Christian parents. By Moving Wilby School, this will increase the class numbers. This will have a detrimental effect to those children that do benefit from smaller classes.
- While [redacted], my school district was re-zoned. [redacted]

- The school is a major part of the village of Wilby which has been here for close to 2 centuries, serving the village and surrounding areas very well. There is a local park and lots of green space just a 5 minute walk from the school on the site of the Wilby Pre Primary school which has served the schools and village very well. The smaller school gives better education to the attending pupils with more teacher to pupil time than larger schools can. [redacted] At least half of those pupils have no access to family transport in order to be able to get to Glenvale school unless the school or council were to supply a village bus to take the pupils from Wilby to Glenvale and back home again. You state that the distance between the schools is 2.4 miles. Well according to Google Maps which is a trusted source the distance is actually 3.5 miles. Moving Wilby school to the Glenvale site will add even more vehicles to that area of the town at the busiest time of the day which is already very busy causing more congestion.
- See previous response
- The school has a role of 90 pupils of which only 6 live in Wilby, but if relocation does take place it is essential that a free bus service is provided to transport these pupils to and from the new school
- 1. To create a larger primary school is not in the best interests of the current pupils, who are used to a smaller and more caring school.  
2. Secondly the new school would be 2 miles from the centre which means it cannot easily be reached on foot. This means parental transport (not always available) or bus (if available) or..... Extra cost to the parents, whichever it is.  
3. Thirdly, based on previous new build schools, it is unlikely to be ready on time and satisfactorily settled into before the next school year.
- Most parents drive into the village so the closure won't affect villagers much. Plus it will reduce the number of cars
- Include transport buses for current parents in the village. It must be alarming for parents who do not drive to transport 2.4 miles away when currently can walk.
- N/A
- Consideration will need to be given as to how the Wilby children reach their new school.
- I hope the concerns of any Wilby residents to this move will be addressed including ensuring there is a safe way to get their children to and from Glenvale Park.
- The school is quite far for parents to travel. Many won't be able to make the commute. Transport organised by the council would only be temporary. Long term, it would have been better to choose a school closer to avoid causing as much disruption. A one from entry school would have helped the school to reach full capacity as well. With the estate still growing, I wonder how many children will be starting from the estate and whether there will be wasted space in the school as Wilby are a very small school.
- I do appreciate it would have a negative impact on the village of Wilby to lose the school. It would also cause the parents who have bought in Wilby for the ability to walk their children to school, there is a lot more children already living on Glenvale park than the amount of students in Wilby being driven to and from school causing a lot more environmental issues with use of fuel etc. [redacted] and the environment was lovely so I do worry how the children who are close to finishing their time at Wilby school would cope with the move around their upcoming tests.
- Wilby already has very few village amenities and this will be another one lost. However, as less than 10% of the pupils at the school are from village families, is it really a village school?
- [redacted] this is very unfair to have a specific/ particular CE school onsite. Im not racist but I wouldn't want to send my children to a school with different structures implemented in the school day being from CE school.  
Why couldn't the space be offered to normal school with nothing different in the day.

Don't get me wrong im all for RE lessons and children learning about different faiths but not for a school where they will most likely implement CE in their routine.

[redacted] I know I am not the only resident who feels this way.

What about families who live here and dont want to send their children to a CE school? We bought a home here with hope of sending our children to a "normal" mainstream school, local to us and with hope of getting a job there hopefully but this will not be fair or likely if Wilby CE are coming.

- Unfair for residents living here who do not want to send their children to a Christian school
- Will be difficult and make life harder for residents with children not wishing to go to a Christian school
- Why has this space been offered to a Christian school only? How is that fair
- Where should parents send their children if they live here and dont wish to send them to a Christian school
- This community strongly needs a normal school and not 1 faith school its important for children to learn different faiths but unfair to attend a school with 1 faith
- The loss of a school from a village can be significant, but given the very small number of children from the village actually in attendance is not a key issue. I would like to see that Wilby School remains as a community asset - meeting room, youth facility etc
- Parents living in Wilby - maybe an initiative to support with transport?
- One of the reasons [redacted] due to the promise of a new school, now we are told the council would not fund it, and another school is being moved in [redacted] Are residents children going to be given priority for a placement? Or is the school going to be at full capacity, I think it's a joke that we pay for the upkeep of this estate and we can't even place our child in the school [redacted].
- Of course, it is a pity to lose a village school, but as housing developments around Wellingborough have disrupted the town and village distribution of the past, a move is more reasonable. I do not know the balance of the proportion of the school community that are families who live in Wilby, but I can imagine for Wilby-based families the move would be sad.
- I do like the community feel of a small village school and it is lovely that all the staff, children and parents know each other. This may be lost when Glenvale Park starts increasing numbers to full capacity.
- Extra travel
- It would cause transport issues not only for us but for a lot of other parents and children at the school who live locally.
- [redacted]
- Larger class sizes impacts on education that is a proven fact. There is also no mention of the school being Church of England and this is important to many parents. Location also means increased traffic due to the ring road being already a busy road which will delay some parents getting to the school and workplace
- Would ths enlarge class sizes?
- potential commute for some children.
- We chose this school as it was a small premises. [redacted] in that environment and can become anxious in bigger spaces, especially the size of the new proposed premises [redacted].
- Transport for the few children who actually live in Wilby
- Increased traffic during rush hour causing additional negative impact on current traffic around the junctions from Wilby to Glenvale. Increase in pollution, accidents and delays for existing residents.

Provision of shuttle bus from current school site would help. Move start and end time for new location outside of current rush hour

- The only negative impact I can see is that it will leave the village with less growth potential as fewer people may move to the village if no school is available.

But I think if the school is converted into another facility that would benefit the village the impacts would easily be reduced. A shop for the village or a nursery would be good.

- N/A
- I would hope the lovely feel of the family values and closeness would remain in a bigger school.
- It would have an impact on a small village community where it is currently at the hub of the village. It would be good for the building to be reused in order to meet this need. It would be more difficult for some parents who have no transport to get their children to a school out of the village. Transport would need to be provided. We may lose the small family feeling of the current school.
- The main negative impact will be on the Wilby village community, who are understandably concerned about losing their village school. However, given the small number of children from the village who currently attend the school, it seems that the substantial benefits of this proposal significantly outweigh the costs. In addition, whilst this move might cause some disruption for existing school families, the distance between Wilby and Glenvale Park is not insurmountable. Perhaps a bus service could be provided for those who are disadvantaged by the additional distance needed to travel due to the move?
- No negative impacts catch in my mind
- I can't see how most of the parents of Wilby will be able to get their children to school without causing traffic and parking issues for the residents. Will Glenvale Park primary be renamed as Wilby CEVA or vice versa? If the school is moving, surely this will impact on how GP is going to be run and by who, as it would have been a new school with new staff. [redacted] I've been led to understand that Wilby will move all their school resources across to the new building. Surely as a new building; they should be provided with all new equipment so the children have the best start possible with all the latest resources? Not all new schools only open with Reception. By the time it will be ready there would surely be enough to initially open multiple year groups on a 1 form or mixed class entry, such as Pineham Barns in Northampton did, which would accommodate families with children of differing ages. Then as the school fills with more children joining the local catchment area they can filter to 2 form entry.
- It is disappointing that a new building cannot be provided within the village of Wilby. The move will place a strain, possibly sever the connection between the school and the parish church. It is difficult to see how this might be mitigated. However, there is an opportunity to build a new relationship between the new school and the worshipping community in Glendale Park.
- Transport will have to be permanently provided to transport pupils from Wilby to Glenvale. There is no possibility of a safe pathway being provided and the distance is too far.. Staff from this very small school are going to struggle with a two form entry primary school.
- Existing school children's travel to and from the new location must be provided for.
- Wilby School's appeal lies in its small size and high student-to-teacher ratio, which provides a nurturing and intimate learning environment. Small "village schools" like ours are highly sought after precisely because of this unique atmosphere. In contrast, the proposed school is expected to accommodate 420 students, which would inevitably diminish the intimate learning experience that draws families to Wilby School. It is essential to recognize and preserve the distinct.
- The relocation of Wilby School would have a significant impact on our village community and its cultural fabric. The school is the heart of the village. Losing

such an integral part of our community would undoubtedly diminish our village's culture.

The village preschool will be significantly affected as their numbers will decrease due to the loss of the primary school.

The school's connection with the church will be lost. This will negatively affect the attendance of churchgoers to Wilby church and also affect how Christianity is taught to the pupils.

Relocating the school would significantly affect local families in the village in terms of accessibility to primary education and the financial burden of relocating schools and purchasing new uniforms. Many students currently walk to Wilby School, and with limited bus services in the village, the proposed new location would leave families without a nearby school that can be safely reached on foot. This would create a challenging situation for families who do not have access to transportation, placing an undue burden on them.

The disruption of the relocation is bound to have some negative outcomes for the students physically, mentally and emotionally. It is unfair to force a school relocation on a primary child and their families especially when the move is not wholly welcomed and the upheaval will be very damaging on the pupils.

Increase in congestion to the Glenvale estate.

Village house prices will decrease and the appeal to move to the village decrease due to the lack of school.

- One of the reasons for the relocation of Wilby school was the need for costly maintenance and modernization. The site would still be required to be used as an educational facility and therefore the maintenance would still need to be undertaken. Focus should be put on maintaining and upgrading the current school location.

The move is not welcomed by the public and locals residents of Wilby. A local petition has gained 407 opposing signatures.

Wellingborough needs SEN schools and Secondary Schools NOT another primary school. The site would be put to better use if made into a SEN school.

- **\*\*Community Disruption\*\***: The proposed relocation threatens to disrupt the close-knit community that has developed around  
**\*\*Loss of Village Identity\*\***: Relocating the school could result in a loss of the village's identity, as the school has been  
**\*\*Reduced Appeal to Young Families\*\***: The move may make the village less attractive to young families looking to settle in the area, potentially impacting its long-term vitality and growth.  
**\*\*Historical and Cultural Loss\*\***: The current school holds historical and cultural significance. Its relocation could result in the loss  
**\*\*Impact on Local Businesses\*\***: A decline in the village's appeal could have a cascading effect, negatively impacting local businesses that rely on a thriving community.  
**\*\*Safety Concerns for Students\*\***: If the proposed new school is not within safe



walking distance, it raises concerns about student safety during commutes.

**\*\*Disconnect from Church and Christian Values\*\***: Failure to preserve the strong ties with the church and Christian values could disconnect the school from its roots and the beliefs of the community.

**\*\*Lack of Stakeholder Involvement\*\***: The lack of active involvement of parents, teachers, and residents in the decision-making process could lead to a sense of alienation and discontent.

**\*\*Loss of Future Generations' Educational Experience\*\***: The exceptional educational experience that the current school provides might be lost to future generations if the relocation proceeds.

**\*\*Potential Alternatives Ignored\*\***: If viable alternatives to relocation were not thoroughly explored, it raises questions about whether the best interests of the village were considered.

**\*\*Uncertainty and Anxiety\*\***: The uncertainty surrounding the future of the school and the potential relocation could create anxiety and stress within the community.

**\*\*Communication Gaps\*\***: Improved communication and transparency between the school administration and the village are vital to address concerns and maintain trust.

- [redacted] The school is small. The Church has involvement with the School. It is right next door. [redacted]
- walking distance is longer from residence (1hr)as kids like to walk.
- li

**Q. If you have any other comments you would like to make that you have not already told us, then please tell us here:**

There were 51 responses.

- I am disgusted by the cloak and dagger approach to this move that Wilby School Governors have taken. Giving 'selected' parents an email survey to complete within two days about the move when in fact they had known about it for weeks before. I would also like to point out that the head chair of Governors claims to have NO personal connections to the school, however, this is entirely false [redacted].
- it needs a re think as it seems unnecessary
- [redacted] The new glenvale site is a 50 min walk from Wilby compared to the walk now of 10-15mins.
- Keep wilby school as it is! Glenvale park isn't needed
- [redacted]. There has been no proper communication with parents other than a very short window before to have our say. Making a choice of where your child goes to school is a big decision for parents and this has been taken away but the proposed move. [redacted] I think it is disrespectful to parents who made that decision for their child.
- I really hope this proposal is reconsidered so not to affect our children's wellbeing and mental health by such disruption and change in their early schooling years.
- It seems very short sighted to build a large school in an estate setting, and because homes have not been sold, effectively close a village facility in order to open the new school.  
It would seem more sensible to delay the opening of the Glenvale school; capacity in schools in the town could be used to place children currently living on the Glenvale Estate until numbers warrant the new school being opened. I wonder if Wilby School is the scapegoat for an error in school places planning - which has undoubtedly been impacted by the economic situation.  
Wilby school is a good school - it should be allowed to continue to serve its local village community.
- The community spirit and few of a local school or village school is very different to a larger multi entry school. This is what is appealing to many parents/ children

- The school at Glenvale Park will eventually have the children it needs but it is proposed to half fill it with children who are happily learning at Wilby School. What North Northants needs is provision for SEND as the current provision in Wellingborough is full and not only that, Rowan Gate has expanded to two other sites in Rushden, both of which are Victorian school buildings and in so doing implying that children with SEND can have mainstream "cast offs" as though these children are less important. The new school at Glenvale Park lends itself to a SEND (ASD) unit as part of a mainstream school. For many children with ASD this is the way for integration to work. [redacted] It has worked else where and could work at Glenvale Park. I understand that the S106 is for a mainstream school, but this can be changed if the desire is there. The building could then open gradually, as Stanton Cross has opened, with a phased intake of both mainstream and SEND provision.
- I do not understand why the Panel have considered the matter before the public consultation is concluded. This makes it look as though this consultation is merely a formality. I consider the whole process is fundamentally flawed because of this, and I think you should go back to re-consider the matter from the start.  
This has been very badly organised and managed in my opinion.
- There is nothing wrong with the current Wilby School building. Although it is small, its size, history and location is what gives it its charm. Children are perfectly happy there. What's more important is that the small classroom system allows the school to have a closer relationship with each child, thus, having an extremely positive impact on learning.
- It has not been made clear to residents if they would be able to send their children of any primary school age to the school
- It's a wonderful building and grounds central to our budding neighborhood I sincerely hope that a good quality setting is achieved that respects the diversity of our neighborhood
- Please go for normal school that has no faith bias.
- [redacted]
- Should a brand new school, in today's society be a Church of England (or any other religion) school? I think it would be more appropriate for a new school to be non religious and so moving Wilby CE VA primary you would be automatically making it a religious school which isn't inclusive and likely doesn't reflect the local community.
- The school was built to ensure there will be enough schools to accommodate all the new housing projects that are taking place. This is just moving the problem around. Unless they plan to Rebuild Wilby school it makes no sense to move as it will only be additional cost to NNC and families which in these current time of inflation doesn't seem reasonable.
- It Seems the 'Chair of Governors' , said she was the representing the governing body .... (She wasn't, no meeting has yet taken place!) Has already decided on what is best... Even before this consultation was released (I Listened to the BBC Radio Northampton interview..... Absolutely shocking that the head of the Governing body hasn't listened to concerns from the rest of the Governors yet Concluded Moving to Glenfield Park is Best for the school.... The Chair of Governors has only her best interests in mind, At least listen to the parents / Diocese / Village & most importantly the children that attend the School!!
- What happens to the pupils next year if the relocation does unfortunately happen that are unable to have transport to and from the school. Which is why some families decided to move to the Village of Wilby because of their situation and the culture of attending a village school with close ties to the Church in Wilby?
- I submitted an on-line survey form yesterday in which I said I believed the process was fundamentally flawed because the Panel considered the matter before the results of the public consultation were known. This in effect makes this consultation exercise meaningless. As further evidence of this situation I notice that in the guidance at the beginning of the consultation it says "...the panel DECISION was made in July to relocate Wilby CE VA Primary School to the Glenvale Park site." which leads one to the conclusion that the consultation is a sham. It seems to me that the guidance has been sloppily written and contributes to the overall sham nature of the consultation process.

- There would seem to be no reason to use the new school building before the inhabitants of that new housing area are even there.  
Unnecessary disruption of the current pupils for the sake of some currently non-existent pupils.
- The children deserve a better learning experience – let's give it to them!
- [redacted]I feel that the current school is not fit for purpose and even if there was the money to upgrade it (which there isn't) the size of site makes it unviable in the 21st century.
- As mentioned if this proposal goes ahead then for thd large asian community already here this will not be welcomed and will most definitely put off potential buyers too from what we have already heard.
- We know if potential buyers who are being put off because they do not want to relocate here and have to travel by car to send their children to school somewhere else as they don't want to send them to a Christian school
- There should be a normal school here not 1 Pacific faith school
- PLEASE CONSIDER OTHER SCHOOLS AND MAKE LIFE EASIER FOR RESIDENTS WHO LIVE HERE
- Having seen both sites, the new site is preferable, and an opportunity that, on balance, carries many more advantages (assuming there is none of this weak, cheap concrete in it that has been in the news). The real trick is for the school to be well-led so that there develops a family atmosphere, valuing the children, encouraging their learning and preparing them well with skills for life and for their next steps in education.
- To accept local kids when the school is transferred
- [redacted] the residents have not taken a positive interest in the school, quite the opposite actually.
- Overall, I believe it is the best option for Wilby CE Primary School to ensure that the children have more opportunities and we can continue to provide them with an education.
- We need this as our school is not fit for purpose anymore. Our children deserve the very best we can offer.
- The current school has all necessary facilities for children. Thanks to the schools small size it is able to focus on each child's individual needs. Expansion of the school would only kill its values and qualities
- I think it is important to keep the school in the village for the students that live here and surrounding areas. If it will be used for educational purposes anyway, there is no need to change it.
- The "Save oy School" campaign is a misnomer. The vast majority of people wish the move to take place. The "Save our School" campaign is attempting to thwart their will and force them to remain in inferior conditions. A number of the points made in the campaign leaflet are in valid and in some cases untrue.  
For example, the school is not the hub or heart of the village. Few, if any events take place outside the normal reach.
- Strongly support this transition.
- I don't understand why it needs relocating? What's wrong with it's current location? And what's being done to support the need for new schools in the wellingborough area with at least 3 new housing sites being built?
- We feel the kids will benefit from better outside space too.
- The concrete pavement is unsafe (eg needs a different surface for when they fall over)
- The site at Sainsbury's should have included a replacement for Wilby School as Glendale is inconvenient to get to.  
Glen ale would then provide for itself.
- Me and my friends think it will be great

- The school needs better computer facilities, Sen areas and parking facilities (obviously there was not the amount of cars about over 100 years ago).
- The staff teach in very restricted conditions and have little personal access to quiet areas needed to support children with additional learning needs.
- I have seen with other schools closing in the past that they have just been left to 'rot' I would be disappointed if the intentions to use the old building were not followed through
- I hope any concerns over Wilby being a C of E school can be overcome and that current and future parents focus on the level
- I am concerned that in the future the building may be used for "other educational purposes". The coming and going of cars and vans
- [redacted], my concern is what other educational purpose the vacant site would be used for as there is not adequate parking around the school.
- Please see the link to the local petition opposing this move. There is also 72 signatures on a paper petition in addition to this. This currently totals 407 people opposing the relocation of Wilby Primary School. <https://chnng.it/V9jQhqPTC5>
- [redacted], it's remarkable that our local petition has garnered such significant support, with 407 signatures. This demonstrates the depth of concern and commitment within our community. I earnestly recommend that, should the relocation proceed, the village should not be left without a school. While we understand there are a number of rationale towards the move we don't believe they are justified, the proposed new location does not seem to be the optimal choice for our village or current students. It may lead to students being redirected to schools that are closer and they may not provide the unique qualities and community ties that our current school offers. Let's work together to ensure that any changes made prioritize the best interests of our village and its children.
- \* would be good if council can arrange school bus service for new school.
- li

## More about you

**Q. Are you responding to this questionnaire as an individual or on behalf of an organisation/community group?** Please tick (✓) relevant answer

There were 158 responses to this question.

|  | Response number | Percentage (%) |
|--|-----------------|----------------|
| As an individual                             | 154             | 97.47%         |
| On behalf of an organisation/community group | 4               | 2.53%          |

**Organisation/community group respondents**

**Q. If you are replying on behalf of an organisation or community group please tell us the name of your organisation and your job title/role:**

**Name of organisation:**

There were two responses to this question.

|   |
|---|
| [redacted] Anglican Church<br>[redacted] Parish Council |
|---|

**Job title/role**

There were two responses to this question. We have not listed the job titles / roles of respondents within this appendix in order to ensure respondents' anonymity is retained.

## Appendix 2: Written responses

### Feedback received via letters / emails

There were three written responses received.

Having read the information regarding the proposed relocation of Wilby Primary School to the Glendale site I have a many concerns.

I do not feel all angles of this proposed relocation have been considered and it feels that the work done has been skewed towards giving the green light to the move. I do not believe it has been a balanced process. I believe several issues have not been thoroughly considered - including relating to provision for SEN pupils and will outline my thoughts for your consideration.

It is stated that the majority of pupils do not come from the village of Wilby itself but from the surrounding Wellingborough area. This is put forward as a reason Wilby doesn't need a school but I think it actually proves a point to the contrary.

No village in the uk has a birth rate of 15 babies per year, each year, every year. Not even 7 babies per year. As such no village school will be primarily populated with children from the village.

The point is that approx 15 families, every year, from the surrounding area feel a small village type school, with the caring, nurturing 'school family' ethos is the right choice for their child.

Moving Wilby school to Glendale obliterates that choice for families such as these. There will be varied reasons for parents/carers wanting to make this choice but it will have been carefully considered and incredibly important to that family and child for the benefit of their education.

[Redacted]. As such, my own personal experience backs the concept I do not think you have fully considered the SEN child experience of different types of school. I believe the school relocation move will negatively impact on many pupils already at Wilby School, especially the SEN contingent. The same can be said for future pupils who have had the opportunity to attend a small, nurturing village school taken away.

Most village schools in this area of Northamptonshire, with the exception of Wilby, are in effect reserved for those more affluent members of society who can afford to live in rural settings. By virtue of distance they have small village schools as an option, as well as the option of larger urban primaries which inevitably have more capacity to take those from further afield. Families living in Wellingborough do not have this choice if Wilby Primary is taken from them and relocated.

Fundamentally you are removing a vital type of primary school, much needed for the education of certain children, from the educational estate. While the pupils will technically have somewhere to go (Glendale) the type of school is so different it will not suit many children.

I would suggest that there is a piece of work that must be carried out before the relocation is finally approved. This would need to assess the impact of change of school type (from small, village, nurturing environment to larger less intimate, school environment), upon current and future pupils, especially SEN and looked after children.

You would need to look at WHY so many families think their child NEEDS to be at Wilby Primary compared to perhaps a larger closer school. Then consider where these families would go and how the children would cope and be educated if the relocation goes ahead.

[Redacted]. I also take umbrage at the concept that Wilby Primary will “literally” be picked up and placed down in Glenvale. By suggesting this is done you forget one very important factor - you have left behind the heart and soul or perhaps the essence of Wilby Primary.

[Redacted] I look forward to hearing from you, please could you acknowledge receipt of this email.

I am emailing just to have my say [redacted] about the proposed school coming to the area.

[Redacted]

Why couldn't the space be offered to a school with no faith like Little Harrowden as was mentioned previously?

[Redacted] a primary school will be opening too so it will be convenient for our children to attend but little did we expect it will be Christian school.

This is very unfair and we strongly oppose this.

How do I go about voicing my concern about the school possibly being moved? I see there is a chance until today, but can't see how to do it. [Redacted].

This page is intentionally left blank



## EXECUTIVE 16<sup>th</sup> November 2023

|                       |   |
|-----------------------|---|
| <b>Report Title</b>   | <b>Social Work Degree Apprenticeships</b>   |
| <b>Report Authors</b> | Adele Wylie - Executive Director of Customer & Governance<br><br>Vicky Wheatley – Learning and Organisational Development Manager – Apprenticeships |
| <b>Lead Member</b>    | Cllr Jason Smithers, The Leader of the Council  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

None

### **1. Purpose of Report**

---

- 1.1. To seek approval to make live a tender opportunity valued at £1.23 million for delivery of Social Worker Degree Apprenticeships on behalf of North Northamptonshire Council, West Northamptonshire Council and Northamptonshire Children’s Trust.

### **2. Executive Summary**

---

- 2.1. Apprenticeships offer an opportunity to develop skills, knowledge and behaviours within specific occupations that are then tested against national benchmark standards to prove competence.
- 2.2. Across the periods of 2024, 2025 and 2026 between North Northamptonshire Council, West Northamptonshire Council (WNC) and Northamptonshire Children’s Trust (NCT) it is expected that up to 55 members of staff will be

enrolled onto the Social Worker Integrated Degree Apprenticeship. The purpose is to enable career progression within the current social care workforce but more vitally, to build resilience and fill vacant roles for Social Workers within a regulated area of the three organisations to meet workforce need against rising customer demand.

- 2.3. The spend to enable this will be met from each organisation's Apprenticeship Levy at a total of £400,000 per organisation. The aggregated contract value is £1.23 million. There are sufficient funds within each organisation's levy fund to meet this need.
- 2.4. It is anticipated that there will be three cohorts. Each cohort will be on the apprenticeship programme for 36-months of training, followed by four-months per cohort for End Point Assessment purposes. This makes the total contract length required to cover all three annual cohorts to be six-years and four-months to qualification.
- 2.5. This report requests approval for the Council to proceed with the tender opportunity as the lead organisation in making live the procurement opportunity, allowing invitations to tender, prior to scoring bids and awarding the contract.
- 2.6. Disaggregation of the Apprenticeship Service from West Northamptonshire Council will conclude on 1<sup>st</sup> April 2024, which will see the novation of 15 Apprenticeship places on the contract issued to West Northamptonshire Council. The remainder of the contract will be managed by the NNC on behalf of its own learners and those of Northamptonshire Children's Trust via a service level agreement.

### **3. Recommendations**

---

- 3.1. It is recommended that the Executive approve the Council's Social Worker Apprenticeship Degree which will be procured through the Crown Commercial Services (CCS) Apprenticeship Training Dynamic Marketplace DPS which is compliant with the Public Procurement Regulations 2015 (as amended).
- 3.2. Reasons for Recommendation:
  - The proposal fully incorporates the Council's "Grow our Own" strategy and starts to use Apprenticeships in a more strategic means for workforce development, acting to retain and support staff to develop their careers.
  - Securing social worker apprenticeship training will enable us to support opportunities for our care leavers and the recent key policies that have been agreed in this area.
  - In meeting future workforce needs via Apprenticeships programmes we are increasing utilisation of the Apprenticeship Levy Account, helping to safeguarding against potential expiry of funds and ensuring maximisation of spend on programmes that will have return on investment and positive impact for the Council.

- Social workers are part of a regulated service, and we must therefore plan to ensure we have resilience and availability of staff to provide a compliant service.
  - It is also recommended that the Crown Commercial Services Apprenticeship Dynamic Purchasing System Apprenticeship route is utilised to run a competitive tendering process to ensure providers bidding have completed base-line pre-checks for quality and achievement rates. Further questions and requirements specified within the documentation ensure providers bidding can meet specific requirements as set by the organisations enabling tailoring of the apprenticeship programme.
- 3.3. Alternative Options Considered: Consideration was given to releasing the opportunity via Lots. This would have allowed each organisation to set their own questions and criteria however this would not give us the buying power required to be able to stipulate the need for Practice Educators to be supplied, trained or funding towards salaries provided and created a greater risk that each organisation would be working with a different training provider. This could create issues related to work experience weeks not co-aligning as required to allow the rotation between organisations as currently planned and utilised in previous models which proved beneficial. Based upon this the Lead Social Workers decided they would like to proceed as outlined above.

#### **4. Report Background**

---

- 4.1 The Council's Apprenticeship Digital Apprenticeship Service team currently serves North Northamptonshire Council, West Northamptonshire Council and Northamptonshire Children's Trust.
- 4.2 The joint contract in place since 2019 for the delivery of this Apprenticeship is now fully utilised and requires renewal to ensure training and development provision for future Trainee Social Workers is available. It is planned that 15 new Social Worker Apprentices will start annually for the next four-years. It is anticipated the first of the four cohorts will start in September 2024. To enable this, the contract is required to be in place by February 2024.
- 4.3 Within the specification for the Social Worker Degree Apprenticeship specific references have been made to request bidding providers to:
- Provide Practice Educations who are current practicing social workers to support our trainee social workers to relieve the current shortage of Practice Educators existing within the NNC and NCT workforce.
  - Provide at no, or minimal cost, PEPs training for the organisations to be able to develop future practice educators within the current workforce
  - To ensure the programme is weighted equally between children and adults social care training to enable easy rotation of trainee social care workers between the three organisations; rather than progressing to external work placements where risk of poaching of staff is prevalent.
  - To include additional training specific to local authority regulation and requirements for social workers.

- 4.4 It is only through combining the organisations' buying power and releasing the one tender opportunity the Council can specify such requirements due to the number of Apprentices that will be starting on programme at the same time. If the Council was to release the specifications individually, it would not have the same abilities to ask for the above to be included at no additional cost.

## **5. Issues and Choices**

---

- 5.1. All organisations have worked jointly through the utilisation of fortnightly meetings to develop the specification and relating questions to providers to ensure it meets all needs of each organisation. The final specification has been shared and all agreed upon on 6<sup>th</sup> October 2024.
- 5.2. Consideration was given to releasing the opportunity via Lots. This would have allowed each organisation to set their own questions and criteria however this would not give us the buying power required to be able to stipulate the need for Practice Educators to be supplied, trained or funding towards salaries provided and created a greater risk that each organisation would be working with a different training provider. This could create issues related to work experience weeks not co-aligning as required to allow the rotation between organisations as currently planned and utilised in previous models which proved beneficial. Based upon this the Lead Social Workers decided they would like to proceed as outlined above.

## **6. Next Steps**

---

- 6.1. Should permission for the joint procurement be granted, the Council is ready to make live the tender documents to allow providers the opportunity to competitively bid to win the contract against its specific requirements. The Council aims to award the contract in February 2024 and build a partnership with the provider in readiness for the first 15 Apprentices to start training in September 2024.

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

- 7.1.1. The cost of the apprenticeship training at £24,000 per Apprentice will be paid utilising the Apprenticeship Levy.
- 7.1.2. The cost of travel to and from training will be met using local budgets. To help reduce such costs, it is stipulated that the successful provider will be within a 60-mile limit of Northampton, with blended delivery maximisation requested to reduce the level of travel required.

7.1.3. Where the Council will be supplying the practice educator, it has built in agreements that allow for payments towards the practice educator salaries to be paid to the Council via our in-house training provider status to help mitigate against costs.

## 7.2. **Legal and Governance**

7.2.1 Novation of the contract to West Northamptonshire Council will be required before 1<sup>st</sup> April 2024 when the disaggregation of services will be achieved.

7.2.2 Procuring the Council's Social Worker Apprenticeship Degree under the CCS Apprenticeship Training Dynamics Marketplace DPS is compliant with the Public Procurement Regulations 2015 (as amended). The CCS Apprenticeship Training Dynamic Marketplace DPS provides access to an extensive range of apprenticeship training programmes that fully supports Education and Skills Funding Agency funding rules which allows public sector bodies the freedom to choose who they contract with.

## 7.3. **Relevant Policies and Plans**

7.3.1 Developing new Social Workers in an area which is notoriously hard to recruit and retain staff within also supports the Council's Corporate Plan:

- Objective 2 – Brighter, better futures - Assist the Children's Trust to provide higher standards of support
- Objective 6 – Modern public services - Provide good quality and efficient services valued by our customers

7.3.2 This proposal fully supports the HR Services plan (2023-2024) by acting to be "effective, proactive and professional people service that anticipates and meets the changing needs of the workforce and enables staff to deliver the best possible outcomes for our residents and the communities."

7.3.3 This firmly sits within the key projects of:

- Investing in You – Provide opportunities for you to reach your full potential, work with you to help you achieve your career aspirations and empower you to grow and succeed.
- Attracting and Growing Our Talent - by utilising the "grow our own strategy, fully exploiting apprenticeships" and enabling "career pathways that give you choices about where to take your next steps".
- Investing in you – supports our commitment to our care leavers and implementation of key policies that have been agreed in this area.

## 7.4. **Risk**

7.4.1 There are no significant risks arising from the proposed recommendations in this report.

## **7.5. Consultation**

7.5.1. As this is related to internal workforce development of employees to enhance careers while ensuring the Council can meet its regulated duties of providing social workers, consultation is not required.

## **7.6. Consideration by Executive Advisory Panel**

7.6.1. This report has not been considered by an Executive Advisory Panel.

## **7.7. Consideration by Scrutiny**

7.7.1. This report has not been considered by the Council's Scrutiny function.

## **7.8. Equality Implications**

7.8.1. An Equality Screening Assessment has been drafted and approved ahead of this Report being presented to the Purchasing Gateway Group.

## **7.9. Climate and Environment Impact**

7.9.1 Market engagement has been organised to ensure local universities that are closer to Northampton are aware of the opportunity to minimise the need for travel, releasing harmful gases into the atmosphere. Online learning and support will also be utilised to its maximum possibility. Where travel is unavoidable, we will aim to encourage apprentices to share transport, if possible. Contract review meetings with the provider will be undertaken remotely, to minimise environmental impact as well.

## **7.10. Community Impact**

7.10.1. The Independent Review of Children's Social Care as reported by the Professional Association of Social Work and Social Workers found that the social cost of childhood adversity as measured by reduced quality of life, lowered economic productivity, poorer health and increased crime is £23 billion per annum. Where families in need are supported effectively by social care their children will experience improved outcomes and they will be supported to access appropriate services to improve their own economic and social circumstances. By developing the council's workforce to have more social workers available in proportion to help and support, will contribute to lower this figure in the future.

## **7.11. Crime and Disorder Impact**

7.11.1. Please see statement at 7.10.1

## **8. Background Papers**

---

8.1 None

This page is intentionally left blank



## EXECUTIVE 16<sup>th</sup> November 2023

|                      |  |
|----------------------|--|
| <b>Report Title</b>  | <b>Local Council Tax Support Scheme 2024/25</b>  |
| <b>Report Author</b> | Janice Gotts – Executive Director of Finance and Performance<br><br>Lucy Hogston - Assistant Director of Revenues and Benefits |
| <b>Lead Member</b>   | Cllr Lloyd Bunday, Executive Member for Finance and Transformation   |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>                | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b> |   |

### List of Appendices

None

#### **1. Purpose of Report**

---

- 1.1. The purpose of this report is to update the Executive on the Local Council Tax Support Scheme for 2023/24 and propose a scheme for 2024/25.

#### **2. Executive Summary**

---

- 2.1. The report provides an update on the Local Council Tax Support Scheme (LCTSS) 2023/24, with regards to claimant caseload, expenditure and Council Tax collection performance to enable Members to make a recommendation to Council on a LCTSS for 2024/25.

### **3. Recommendations**

---

- 3.1. Is recommended that the Executive
- a) Consider the information as set out in the report and endorse a proposed 2024/25 Local Council Tax Support Scheme which maintains the current 2023/24 scheme, allowing for the changes required to reflect the annual uprating of allowances and premiums and any statutory base legislation changes which are required to be made to the scheme.
  - b) Recommend the proposed Local Council Tax Support Scheme 2024/25 to Council for approval at its meeting on 7<sup>th</sup> December 2023.
- 3.2. Reason for Recommendations – to deliver a Local Council Tax Support Scheme for 2024/25 that meets statutory requirements.
- 3.3. Alternative Options Considered – The Council could choose to increase or decrease the minimum contribution payable to the customer. Decreasing the contribution would lead to a budget pressure and increasing the contribution would result in the scheme exceeding the breakeven requirement as detailed in 7.1.2 and 7.1.3.

### **4. Report Background**

---

- 4.1. From 1<sup>st</sup> April 2013, each Local Authority has been required to determine a Local Council Tax Support Scheme (LCTSS), which replaced the national Council Tax Benefit Scheme.
- 4.2. The scheme applies to working age claimants only as the government prescribes the scheme for pensionable age claimants.
- 4.3. Local discretion relates to the maximum level of support available to working age claimants, and therefore the minimum percentage of the Council Tax bill they are expected to meet. There is also local discretion in relation to eligibility criteria.
- 4.4. Due to the formation of the Unitary Authority from 1<sup>st</sup> April 2021 a single LCTSS was consulted on and implemented for North Northamptonshire Council from 2021/22, this included a review of the four separate sovereign District and Borough LCTS Schemes and resulted in a scheme where all working age claimants were required to pay a minimum of 25% towards their Council Tax liability.
- 4.5. The LCTSS was reviewed for 2023/24 and it was decided at Full Council on 24<sup>th</sup> November 2022, that the scheme for 2023/24 would remain the same as that in place for 2021/22 and 2022/23 (minimum of 25% payment), with the exception of changes to be made for the annual uprating of allowances and

premiums and statutory base legislation changes which are required to be made to the scheme.

## **5. Issues and Choices**

---

- 5.1. The Local Government Finance Act 1992 (1992 Act), Section 13A (2), amended by the Local Government Finance Act 2012 (2012 Act) stipulates that for each financial year, each billing authority must consider whether to continue its LCTSS or replace it with another scheme.
- 5.2. There are around 17,493 claimants in receipt of LCTS in North Northamptonshire, of these 57% are of working age and 43% of pensionable age. The current LCTS expenditure for 2023/24 is £16.7m, this may change by the end of the financial year depending on whether claimant caseload increases or decreases.
- 5.3. Since the implementation of the LCTSS on 1<sup>st</sup> April 2021, the number of claimants has reduced by 598.
- 5.4. Council Tax collection rates are monitored on a monthly basis, the amount of Council Tax collected for the financial year 2022/23 was £221m, which equates to 96.80% on the net debit raised. This is 0.47% above the in-year collection rate for 2021/22.
- 5.5. The amount of Council Tax collected for the period 1<sup>st</sup> April 2023 – 31<sup>st</sup> August 2023 was £116m, which equates to 47.82% of the net debit raised. This is 0.82% above the 2023/24 target and 0.73% below the collection rate at the same point in time during 2022/23.
- 5.6. Historically, concerns have been raised about a person's ability to pay the minimum 25% contribution towards their Council Tax. The Council has a scheme in place where an individual can apply for a Council Tax Discretionary Discount under a provision within Section 13A of the Local Government Finance Act 1992 (as amended by the Local Government Finance Act 2012) and this provides the Council with discretionary powers to reduce Council Tax liability. The Council Tax Discretionary Discount awards are made to mitigate any unforeseen or exceptional hardship circumstances that threaten taxpayers' ability to pay the Council Tax.
- 5.7. For the financial year 2022/23, 301 Council Tax Discretionary Discount applications were received. Resulting in 21 awards totalling £22,718 and 280 refusals.
- 5.8. For the period 1<sup>st</sup> April 2023 to 31<sup>st</sup> August 2023, 152 Council Tax Discretionary Discount applications have been received. Of these 100 have been processed, resulting in 11 awards (£11,848) and 89 refusals. There are 52 applications awaiting assessment, this is where further information has been requested from the customer to complete their application.

- 5.9. The majority of those refused either have excess income so it is considered that they are able to afford to make the payments or they did not provide further information that was requested to support their application. No one has appealed the refusals, and the service can clearly show individuals the methodology used.
- 5.10. In nearly all the cases the Revenues and Benefits Social Inclusion Team has spoken with the customer and has been able to help in other areas such as Discretionary Housing Payment applications, Personal Independence Payment applications, utilities and general money and debt advice.
- 5.11. Taking into account the position of the current LCTSS, it is proposed that the Council continues with the same scheme from 1<sup>st</sup> April 2024 (2024/25). The only changes being the annual uprating of allowance and premiums and the application of any statutory base legislation base changes which are required to be made to them scheme. The Council will also continue to operate the Council Tax Discretionary Discount Scheme in line with Section 13A of the Local Government Finance Act.

## **6. Next Steps**

---

- 6.1. The Local Council Tax Support Scheme will be presented to Council for approval at its meeting on 7<sup>th</sup> December 2023.

## **7. Implications (including financial implications)**

---

### **7.1. Resources, Financial and Transformation**

- 7.1.1. If the LCTSS remains the same in 2024/25 as in 2023/24, there will not be a requirement for a consultation process, in addition the Revenues and Benefits ICT systems would not need their parameters updating to accommodate the scheme changes. Therefore, there are no immediate resource implications from the proposals.
- 7.1.2. The actual cost of the scheme for 2022/23 was £16m against an estimated cost of £16.4m. For 2023/24 expenditure is £16.7m, against an estimated cost of £16.7m. Therefore, based on the current trend in caseload and expenditure since 1<sup>st</sup> April 2021, the scheme could continue as in 2023/24 without the need to increase the minimum contribution (25%) and remain cost neutral in 2024/25.
- 7.1.3. Generally, a 1% movement in the minimum payment rate from the current scheme amounts to a change in the Council's budget of c£80k. For example, changing to a 20% scheme would create an estimated cost pressure of around £400k.

## **7.2. Legal and Governance**

7.2.1. The requirement for a local authority to produce a LCTSS are set out in the Local Government Finance Act 1992 (1992 Act), Section 13A (2), amended by the Local Government Finance Act 2012 (2012 Act). There are detailed provisions about the contents of such a scheme, in particular contained within the Council Tax Reduction Scheme (Prescribed Requirements) (England) Regulations 2012 and updating regulations on an annual basis to reflect consistency with changes in social security legislation.

7.2.2. The body charged with determining LCTSS is Council. Executive is not the decision maker but will consider the scheme and comments from this meeting to make a recommendation to Council for consideration in relation to the LCTSS. The LCTSS for 2024/25 must be determined by 11<sup>th</sup> March 2024.

## **7.3. Relevant Policies and Plans**

7.3.1. The LCTSS is part of the arrangements for the collection of Council Tax and as such aligns with the Councils priorities as set out within the Corporate Plan as part of the delivery of modern public services.

## **7.4. Risk**

7.4.1. There is a low-level risk with regards to the affordability of the scheme for customers if the LCTSS remains the same. Effective controls have been put in place such as proactive recovery processes and money and debt advice provision. This is reflected in the collection rates not being negatively impacted, and furthermore they are above target for this financial year.

7.4.2. Given that the proposal is to extend the current arrangements into 2024/25 there are no system development issues associated with the proposals.

## **7.5. Consultation**

7.5.1. Consultation is only required if North Northamptonshire Council decide to revise the LCTSS that is currently in place.

7.5.2. If the Council decide to revise the scheme then it must, in the following order:

- a) Consult any major precepting authority which has power to issue a precept to it,
- b) Publish a draft scheme in such a manner as it thinks fit, and
- c) Consult such other persons as it considers likely to have an interest in the operation of the scheme.

## **7.6. Consideration by Executive Advisory Panel**

7.6.1. Not considered by the Executive Advisory Panel.

## **7.7. Consideration by Scrutiny**

7.7.1. The Corporate Scrutiny Committee considered the LCTSS 2024/25 at its meeting on 10<sup>th</sup> October 2023 and approved the recommendation for continuation of the current scheme to be progressed forward to Executive.

## **7.8. Equality Implications**

7.8.1. A full Equality Impact assessment was undertaken when the LCTSS was originally introduced in 2021/22 and is set out in the report to the Shadow Executive at its meeting on 7<sup>th</sup> January 2021.

7.8.2. The only negative impacts identified when introducing the scheme for 2021/22 were around socio-economic exclusion and health and wellbeing, this was because three of the sovereign authorities operated a more generous LCTSS than the one being introduced.

7.8.3. When the Equalities Impact Assessment was reviewed for the 2022/23 and 2023/24 LCTSS, these negative impacts no longer applied as all claimants contributed a minimum of 25% towards their Council Tax liability and the proposal was for this to continue. Once again, the same applies to the 2024/25 LCTSS as the proposal is to continue with the minimum 25% contribution.

## **7.9. Climate and Environment Impact**

7.9.1. There are no climate or environment impacts arising from the proposals.

## **7.10. Community Impact**

7.10.1. There are approximately 10,189 working age LCTS claimants in North Northamptonshire; this represents approximately 7% of the North Northants community liable to pay Council Tax. If the LCTSS remains unchanged there won't be any impact on these claimants, however any changes to the LCTSS may have a financial impact on the group depending on what change that is.

## **7.11. Crime and Disorder Impact**

7.11.1. There are no crime and disorder impacts arising from the proposals.

## 8. Background Papers

---

- 8.1. North Northamptonshire Shadow Executive Committee Meeting, 7<sup>th</sup> January 2021, Local Council Tax Support Scheme 2021/22 (item 10).  
[Meeting of North Northamptonshire Shadow Executive Committee on Thursday 7th January, 2021 - North Northamptonshire Council \(moderngov.co.uk\)](#)
- 8.2. North Northamptonshire Council Finance & Resources Scrutiny Committee, 2<sup>nd</sup> November 2021, Local Council Tax Support Scheme 2022/23.  
[7. Local Council Tax Support Scheme 2022-23.pdf \(moderngov.co.uk\)](#)
- 8.3. North Northamptonshire Council Executive meeting, 18<sup>th</sup> November 2021, Local Council Tax Support Scheme 2022/23  
[Local Council Tax Support Scheme 2022-23 - Formatted.pdf \(moderngov.co.uk\)](#)
- 8.4. North Northamptonshire Council, Council meeting 1<sup>st</sup> December 2021, Local Council Tax Support Scheme 2022/23.  
[Local Council Tax Support Scheme.pdf \(moderngov.co.uk\)](#)
- 8.5. North Northamptonshire Council, Finance and Performance Scrutiny Committee 18<sup>th</sup> October 2022, Local Council Tax Support Scheme 2023/24  
<https://northnorthants.moderngov.co.uk/documents/s12303/6%20-%20Final%20Local%20Council%20Tax%20Support%20Scheme%202023-24.pdf>
- 8.6. North Northamptonshire Council, Executive Committee 10<sup>th</sup> November 2022, Local Council Tax Support Scheme 2023/24  
<https://northnorthants.moderngov.co.uk/documents/s12704/Local%20Council%20Tax%20Support%20Scheme%202023-24.pdf>
- 8.7. North Northamptonshire Council, Council meeting 24<sup>th</sup> November 2022, Local Council Tax Support Scheme 2023/24  
<https://northnorthants.moderngov.co.uk/documents/s12910/Full%20Council%20Local%20Council%20Tax%20Support%20Scheme%202023-24%20v2.pdf>
- 8.8. Local Government Finance Act 1992.  
<https://www.legislation.gov.uk/ukpga/1992/14/contents>
- 8.9. Welfare Reform Act 2012.  
<https://www.legislation.gov.uk/ukpga/2012/5/contents>
- 8.10. Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012.  
<https://www.legislation.gov.uk/uksi/2012/2885/contents/made>

This page is intentionally left blank



## EXECUTIVE 16<sup>th</sup> November 2023

|                      |   |
|----------------------|---|
| <b>Report Title</b>  | <b>Indicative Budget Timeline and Scrutiny Process 2024/25 - Update</b> |
| <b>Report Author</b> | Janice Gotts, Executive Director of Finance and Performance             |
| <b>Lead Member</b>   | Lloyd Bunday, Executive Member for Finance and Transformation           |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>              | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number for exemption from publication under Schedule 12A Local Government Act 1974</b> |   |

### List of Appendices

#### Appendix A - Diagram of Latest Financial Planning Cycle – 2024/25 Budget

#### 1. Purpose of Report

---

- 1.1 The purpose of the report is to consider the 2024/25 budget setting process and scrutiny arrangements for North Northamptonshire Council.
- 1.2 At the Council budget setting meeting in February 2023 the following reports will require approval:
- The **General Fund** budget and the Council Tax levels for 2024/25 and the General Fund Medium Term Financial Plan.
  - The **Housing Revenue Account (HRA)** Budget for 2024/25 and the level of Housing Rents for 2024/25 and the Housing Revenue Account Medium Term Financial Plan.
  - The **Capital Strategy and Capital Programme 2024-27** for the both the Housing Revenue Account and the General Fund.

- 1.3 Prior to the final reports being presented to Executive and then on to Council, the financial position will require scrutiny by this Committee.
- 1.4 The Committee is requested to note and comment on the budget process for the forthcoming financial year and consider the latest proposals.

## **2. Executive Summary**

---

- 2.1 The report provides an overview of the budget timeline for the 2024/25 budget process for the General Fund, the HRA and the Capital Programme. This includes an update on the proposed arrangements for scrutiny which the Executive is requested to consider.

## **3. Recommendations**

---

- 3.1 It is recommended that Executive:
  - a) Approve the proposed process and note the timeline for the setting of the budget and that this may be subject to change in line with Government announcements or other factors. In particular:
    - the proposed budget setting and scrutiny arrangements for the Children's Trust as set out in this report, see particularly paragraphs 5.7 to 5.11 of the report.
    - the overall indicative timeline for the budget setting as set out under paragraph 5.13.
  - b) Note that the process has been to the Corporate Scrutiny Committee for comment, and that the approach outlined in this report was approved.
- 3.2 Reason for Recommendations – To inform Executive of the indicative budget setting timeline for 2024/25 and the arrangements for the scrutiny of the budget by the Corporate Scrutiny Committee.
- 3.3 Alternative Options – There are no alternative options under consideration, due to the need to meet approval deadlines and consultation requirements. The Corporate Scrutiny Committee considered the proposals as set out in section 6 of this report regarding the scrutiny arrangements and were agreed to proceed on the basis as outlined. Some dates of the scrutiny committee work group meetings remain subject to finalisation, as outlined in the report, and others may be affected by further Government announcements.

## **4. Report Background**

---

- 4.1 In setting the Council's budget there are three main areas that are reported, namely:

- General Fund, including the Dedicated Schools Grant (DSG) and funding for the Children’s Trust
- Housing Revenue Account (HRA)
- Capital Programme

The paragraphs below set out a summary of the requirements for each area.

### **General Fund**

- 4.2 The Council's General Fund budget is funded from five main income sources which are Council Tax, Business Rates, government grants, fees and charges and, where needed, the use of reserves.
- 4.3 In recent years as central government funding has reduced, business rates retention and the ability to grow and retain the amount of resources raised locally has become even more important for financial sustainability and this is integral to the Council’s financial planning.
- 4.4 The level of funding for Local Government in future years is uncertain. Whilst it is expected that there will be some form of “roll-over” budget into 2024/25 from 2023/24, the wider funding reforms are to be delayed until 2026/27 and there remains significant uncertainty from 2026/27 onwards.
- 4.5 However, there are further spend pressures to consider into 2024/25 including the cost of significant inflationary increases within the Children’s Trust and across adult services. which have been evident for 2023/24 to date and are expected to continue into next year.
- 4.6 The future budget position will be informed by activity throughout the year which will be reported as part of the budget monitoring and/or budget setting process.
- 4.7 This section also incorporates the Dedicated Schools Grant (DSG), which is a ring-fenced grant that is presented to Schools Forum for consideration. The calculation of the overall DSG is determined by Government and the local distribution is subject to formula arrangements, which are consulted on with the Schools’ Forum. Changes to the funding formula must be approved by Executive.

### **Housing Revenue Account (HRA)**

- 4.8 The HRA is a separate ring-fenced account within the Council for the income and expenditure associated with its housing stock. The HRA does not directly impact on the Council’s wider General Fund budget or on the level of council tax. Income to the HRA is primarily received through rents and other charges paid by tenants and leaseholders.
- 4.9 Whilst North Northamptonshire Council must only operate one HRA it will, for a limited period, operate two separate Neighbourhood Accounts (Corby Neighbourhood Account and the Kettering Neighbourhood Account). The bringing together of the Neighbourhood Accounts requires further development of the HRA Business Plan and work with Government and outside bodies, such as the Chartered Institute of Public Finance & Accountancy, regarding

harmonisation and accounting requirements. The Business Plan will be informed by the housing strategy for North Northamptonshire which will consider the challenges faced by the Council across the local housing market and will set out measures to enhance housing options for local residents.

- 4.10 A key element of the HRA budget will be to determine and set the rent levels for 2024/25. The basis for calculating Housing Rent levels is determined by the Housing Rent Regulator and has been based on the Consumer Price Index (CPI) in September of the preceding each year plus 1%. The CPI figure for September 2023 is 6.7% resulting in an increase of 7.7% this will be discussed with the Tenants Advisory Panel. Generally, a deviation from Government's policy on rents for social housing would require the Council to apply to the Secretary of State to agree that it would be inappropriate to apply this policy. In 2023/24 due to the high levels of inflation, and the desire to constrain rent increases, the Government consulted on three levels of lower than inflation rent increase (namely 3%, 5% or 7%) to be applied in preference to CPI +1% and determined a level of 7%. No announcement has been made regarding rent levels for 2024/25.

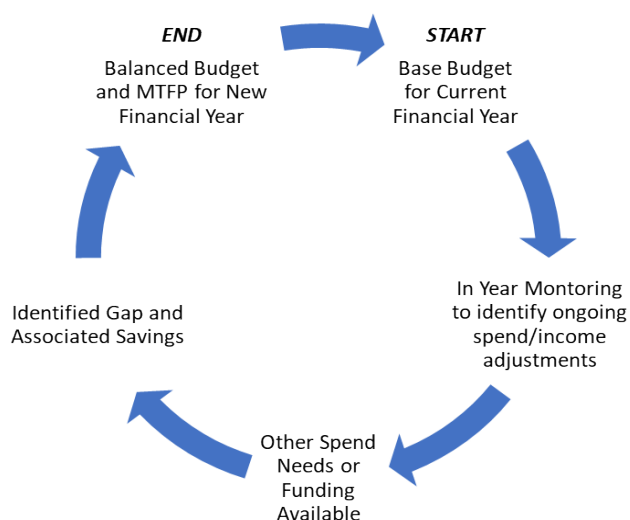
### **Capital Programme**

- 4.11 The Council will be required to approve a Capital Programme for 2024/28 for both the HRA and the General Fund, and a Development Pool based on the Capital Strategy. The delivery of a Medium-Term Capital Programme which is affordable and sustainable, ensuring that the Council's internal resources and application of external borrowing are utilised to fund capital expenditure where it supports the delivery of the Council's financial sustainability and where there are statutory requirements such as health and safety.
- 4.12 The Capital Strategy should make explicit the links to, and integration with, the Council's other strategies - with new capital investment only being permitted if it contributes to the achievement of the Council's corporate priorities.

## **5. Budget Process 2024/25**

---

- 5.1 The Budget Strategy provides the basis for the setting of the 2024/25 Budget and the Medium-Term Financial Plan.
- 5.2 The robustness of both the budget pressures and savings are of equal importance when setting a balanced budget – the pressures need to reasonably reflect those that the Council is facing, and the savings must be deliverable.
- 5.3 As a general principle, the high-level strategy for setting the 2024/25 budget is as illustrated in the diagram below. Information will be taken from the 2023/24 budget, amended for recurring issues identified through the budget monitoring process which cannot be mitigated against, together with any other known changes (savings/pressures) before coming to a balanced budget position for 2024/25. The Council has a statutory requirement to balance its budget.



5.4 When the 2023/24 budget was set, there was an indicative financial gap over the following two years as set out in the table below. This was based on the best information available at the time, including the assumption that the funding regime for Councils would change from 2024/25, having been delayed from the previous year:

|                         | <b>2023/24<br/>£'000</b> | <b>2024/25<br/>£'000</b> | <b>2025/26<br/>£'000</b> |
|-------------------------|--------------------------|--------------------------|--------------------------|
| Net Budget Requirement  | 336,590                  | 359,058                  | 388,739                  |
| Total Funding           | 336,590                  | 341,958                  | 335,473                  |
| Gap/Savings Requirement | 0                        | 17,100                   | 53,266                   |

5.5 The updated forecast gap will require the Council to set out where costs can be reduced and where efficiencies can be made and to identify opportunities to increase income. Where these are identified, and approval is given, then they will be reflected in the MTFP and, where appropriate, be included in the base budget for future years.

5.6 It is important budget managers scrutinise their budgets to ensure that services are delivered as efficiently as possible. To assist and provide additional focus in delivering a balanced budget the following areas will be considered as part of the budget process.

### **Northamptonshire Children's Trust (NCT)**

5.7 There is a separate Children's Trust which operates across Northamptonshire. The Trust provides Children's Social Care support under contract to North Northamptonshire Council and West Northamptonshire Council. Each year the Councils consider the funding requirement for the Trust in line with the contract arrangements between the Councils and the Trust. The Council will include this sum as part of its budget requirements for approval.

5.8 With regard to the timeline for budget approval with the Trust, this is set out within the contract where it is required that on or before 30<sup>th</sup> November in each contract year the Strategic Group shall meet to discuss and agree the proposed contract sum for the following year, which shall take into account a number of factors including the Trust's draft business plan. The Trust will also provide an

estimate for future years as an indicative assessment based on the information that the Trust has available to it.

- 5.9 Each Council is required to seek internal approval of the provisional contract sum by 15<sup>th</sup> January for the forthcoming financial year. The Trust acknowledges that as part of the Council's approval process for approving the provisional contract sum, the Trust may be required to support the Director of Children's Services at any scrutiny meeting of the Council in accordance with the agreed governance arrangements set out within the contract.
- 5.10 Subject to Council approval, the provisional sum shall become the actual contract sum payable.
- 5.11 A proposed timeline has been drafted for the scrutiny and approval of the budget for the Children's Trust and the contribution from North Northamptonshire, and this is set out below for comment. As indicated above, some of the dates regarding the approval of the Trust budget are set out as part of the contract with the Trust and cannot be changed.

#### Proposed Timeline for Children's Trust

| <b>Date</b>                     | <b>Activity</b>  |
|---------------------------------|--|
| 15 <sup>th</sup> September 2023 | First draft of NCT Business and Budget Plan – submitted to Councils for consideration and verification   |
| 30 <sup>th</sup> October 2023   | Phase 1 Scrutiny session – to review in-year Children's Trust position which will also inform the base for 2024/25   |
| 7 <sup>th</sup> November 2023   | Business and Budget Plan proposals discussed at Operational Commissioning Group  |
| 21 <sup>st</sup> November 2023  | Business and Budget Plan proposals discussed at Strategic Commissioning Group  |
| 30 <sup>th</sup> November 2023  | Final Date for Draft Children's Trust Budget to be agreed  |
| 4 <sup>th</sup> December 2023   | Phase 2 Scrutiny session – to review the Children's Trust 2024/25 budget   |
| 21 <sup>st</sup> December 2023  | Scrutiny Feedback to December Executive  |
| 15 <sup>th</sup> January 2024   | Final Date for formal agreement to Children's Trust Budget 2024/25. The proportionate share of the Trust Budget for North Northamptonshire will be included within the Council's budget. |

#### **Timeline for Budget Setting 2024/25**

- 5.12 The Council is required to set a Balanced General Fund budget and the levels of Council Tax for 2024/25 at its budget meeting in February 2024. The Council is also required to set a Balanced HRA Budget and rent levels for 2024/25 along with a Capital Programme for both the General Fund and HRA.

- 5.13 The indicative summary timetable for the setting of the budget is as set out below and includes the recommended timeline for the Trust as set out above, this is subject to amendment in light of government announcements and other potential changes:

| <b>Key Dates</b>  | <b>Activity</b>   |
|---|---|
| <i>During Year</i>  | <i>Budget Monitoring reports produced which will be presented to Executive and Corporate Scrutiny.</i>  |
| 30 <sup>th</sup> October 2023 to 20 <sup>th</sup> November 2023 | Phase 1 Scrutiny – Corporate Scrutiny Committee members to have dedicated sessions with Service Directors, and separately the Children’s Trust, to understand the current in year position for the budgets, which will inform the requirement for 2024/25.  |
| 7 <sup>th</sup> November 2023                                   | <i>Children’s Trust</i> - Business and Budget Plan proposals discussed at Operational Commissioning Group   |
| 21 <sup>st</sup> November 2023                                  | <i>Children’s Trust</i> - Business and Budget Plan proposals discussed at Strategic Commissioning Group   |
| 22 <sup>nd</sup> November 2023                                  | Expected date for the Government’s Autumn Statement which will outline the Government’s plans for spending, taxation and borrowing for 2024/25.   |
| 30 <sup>th</sup> November 2023                                  | <i>Children’s Trust</i> - Final date for draft budget proposals to be agreed  |
| 4 <sup>th</sup> December 2023                                   | <i>Children’s Trust</i> - Phase 2 Scrutiny session – to review the Children’s Trust 2024/25 budget.   |
| w/c 18 <sup>th</sup> December 2023                              | Provisional Local Government Finance Settlement expected.   |
| 21 <sup>st</sup> December 2023                                  | Draft Budget 2024/25 report presented to Executive.<br><br>Consultation on the budget will commence following the meeting and subject to Executive approval.<br><br>Draft Schools Budget (Dedicated Schools Grant) to Schools Forum.<br><br><i>Children’s Trust</i> – Corporate Scrutiny Committee feedback to December Executive |
| 8 <sup>th</sup> January 2024 to 19 <sup>th</sup> January 2024   | Phase 2 Scrutiny – Corporate Scrutiny Committee members to scrutinise the Council’s budget proposals with sessions for each Directorate. To include presentation on the overarching draft budget proposals.<br><br>HRA rent increase consultation to tenants’ forums / representatives.   |
| 15 <sup>th</sup> January 2024                                   | <i>Children’s Trust</i> - Latest date that the Council is required to seek approval of the contract sum   |

| <b>Key Dates</b>               | <b>Activity</b>  |
|--------------------------------|--|
| 18 <sup>th</sup> January 2024  | Budget Update to Executive following the Local Government Finance Settlement, if it is not announced in time for the December draft budget report. |
| 23 <sup>rd</sup> January 2024  | Corporate Scrutiny Committee to consider report on the feedback from the Scrutiny Task and Finish sessions.  |
| 26 <sup>th</sup> January 2024  | Budget consultation ends (proposed date)   |
| 8 <sup>th</sup> February 2024  | Updated Budget reports, including feedback from Scrutiny, presented to Executive for approval and recommendation on to Council                     |
| 22 <sup>nd</sup> February 2024 | Setting of the Budget - Suite of Budget Reports presented to Council for approval  |

## **6. Issues and Choices – Proposed Scrutiny Arrangements**

---

- 6.1 The Corporate Scrutiny Committee has a critical role to play in scrutinising and reviewing the budget proposals, ensuring that they are subject to rigorous challenge. The Committee will provide recommendations to the Executive on the budget proposals that have been put forward.
- 6.2 It is proposed that detailed scrutiny of the budget is carried out in two distinct phases by the Committee, which follows on from the process undertaken as part of the 2023/24 budget process.
- 6.3 **Phase 1** of scrutiny is to be undertaken between 30<sup>th</sup> October and 20<sup>th</sup> November 2023. This first phase of scrutiny will look at the in-year position and the detail of the current budgets and activity as well as general pressures and opportunities. This will include any updates with regard to Government funding arrangements and any other proposals. It is intended that this will provide the groundwork for the scrutiny of the budget proposals, ready for when there is greater clarity of the potential funding and other budget requirements.
- 6.4 **Phase 2** of scrutiny will take place when the 2024/25 draft budgets proposals have been reported to Executive which is expected to be on 21<sup>st</sup> December 2023. This will trigger the budget consultation and will represent the formal draft proposals. The Scrutiny process will complete in January 2024 alongside the consultation, to feed into the updated budget report to Executive on 8<sup>th</sup> February 2024.
- 6.5 Similar to the process for 2023/24 it is proposed that the Scrutiny sessions for phases 1 and 2 cover the main service areas of:
- Place and Economy
  - Adults, Health, Partnerships and Housing, including the HRA
  - Communities and Public Health
  - Children’s and Education Services
  - Enabling and Support Services – Finance and Performance, Chief Executive including Chief Information Officer and Customer and Governance.



This will include both the revenue budgets and the capital programme for each of the main service areas.

- 6.6 Each service area will attend a scrutiny session to present their service and budget plans. The Corporate Scrutiny Committee will be able to scrutinise each plan and may request further details on a particular area. Scrutiny Members are requested to identify any areas requiring further detailed information prior to the meeting with the Directorates taking place in order that this can be drawn together in preparation for the meeting. This will enable the Corporate Scrutiny Committee to ensure that it has the required information necessary to adequately scrutinise the proposals and provide any subsequent feedback and recommendations to the Executive.
- 6.7 Further to the above, the Committee will also receive a presentation on the overarching financial position to provide the context to the budget proposals as part of the phase 2 scrutiny.
- 6.8 The indicative timeline for Scrutiny to take place is set out under paragraph 5.13 above.

## **7. Implications (including financial implications)**

---

### **7.1 Resources and Financial**

- 7.1.1 None that are specific for this report.

### **7.2 Legal and Governance**

- 7.2.1 The requirement to approve the budget for the Children's Trust is set out in the contract arrangements between the Councils (North Northamptonshire Council and West Northamptonshire Council) and the Trust.
- 7.2.2 The statutory arrangements for the setting of a Local Authority's budget are set out within the Local Government Finance Act. The Council's Constitution contains further requirements in relation to budget setting and approval for North Northamptonshire Council.

### **7.3 Relevant Policies and Plans**

- 7.3 The budget strategy must align to the Council's Corporate Plan and Strategic Priorities.

### **7.4 Risk**

- 7.4.1 The paragraphs that follow represent the risks in the preparation of the budget.
- 7.4.2 The basis of the budget strategy is to ensure that the Council delivers a balanced budget for 2024/25 to be presented to Council for approval in February

2024; however, there are inevitably risks that may cause expenditure to increase or income to reduce. Consequently, income and expenditure levels will be kept under review throughout the budget process.

7.4.3 It will not be possible to finalise funding in the budget until government announcements on future funding levels are published, which is expected to be later in the year. The Chancellor's will present the Autumn Statement on 22 November, but this will not provide the detail around individual authority allocations.

7.4.4 The impacts of the changes to funding or other external factors will be reported to Members once announcements are made and officers have understood the implications for the Council. Where appropriate, these will be included in the Council's updated Medium-Term Financial Plan for 2024/25 onwards.

## 7.5 Consultation

7.5.1 Currently it is envisaged that the first public draft of the budget will be presented to the Executive at its meeting on 21<sup>st</sup> December 2023. The Corporate Scrutiny Committee will then have the opportunity during the budget process to make suggestions to the Executive prior to final budget approval by the Council.

7.5.2 This report sets out the terms of consultation for the 2024/25 budget proposals. The consultation will commence once the draft budget proposals have been agreed by Executive and will run until 26<sup>th</sup> January 2024, prior to the Executive meeting in February.

7.5.3 The structure and design of the consultation will set out the budget proposals and will enable both online and non-digital means of participation, in accordance with good practice. This is to ensure the widest possible reach, a variety of consultation methods will be used to maximise the range of accessible channels for consultees, these include;

- Online survey – available at libraries for those without internet access (with hard copies and copies in other formats available on request)
- An email address and telephone number
- Social media - including Facebook, Twitter and LinkedIn
- Postal address
- Emails to key stakeholders, inviting them to comment through the above consultation channels and asking them to promote the consultation to their members/community: e.g., partner organisations, MPs, Town and Parish Councils, Voluntary Sector Infrastructure Organisations.
- Emails to Residents' Panel members and other stakeholders who have registered to receive consultation alerts, inviting them to comment through the above consultation channels

7.5.4 The purpose of the consultation is to ensure that, when the Final Budget is considered by Council, Members are aware of the outcome of the consultation and are in a position to take it into account when making final decisions.

- 7.5.5 In addition, there will be specific consultation for any budget proposals that require targeted consultation with service users. This will include consultation with local residents regarding the HRA and proposed rent levels, and scrutiny will be advised on the mechanisms for this in the coming year.
- 7.5.6 Consideration of the draft budget proposals will be undertaken by the Corporate Scrutiny Committee who will report their recommendations to the Executive meeting on 8<sup>th</sup> February 2024. The Executive must then make recommendations on the final, scrutinised, budget and HRA rent proposals to Council for approval.
- 7.5.7 Scrutiny is a means for councillors not on the Executive to influence the development of Council policies and services and hold decision makers to account. Budget Scrutiny involves councillors reviewing significant proposals from across the draft budget and reporting their conclusions about the deliverability and service impact of these proposals to the Executive. In this way Budget Scrutiny contributes to the development of the final budget proposals and supports local democracy.

## **7.6 Consideration by Executive Advisory Panel**

- 7.6.1 Not considered by the Executive Advisory Panel.

## **7.7 Consideration by Scrutiny**

- 7.7.1 The report on the proposed budget timeline and scrutiny arrangements for 2024/25 was presented to the Corporate Scrutiny Committee for review and comment at its meeting on 10<sup>th</sup> October 2023.
- 7.7.2 The Committee was supportive of the approach set out in the report.

## **7.8 Equality Implications**

- 7.8.1 In considering the budget for 2024/25, the Council must consider its ongoing duties under the Equality Act 2010. It must have due regard to the need to eliminate discrimination and advance equality of opportunity between all, irrespective of whether they fall into a protected category. Having due regard to these duties does not mean that the Council has an absolute obligation to eliminate discrimination. It must, however, consider how its decisions will contribute towards meeting the duties in light of all other relevant circumstances such as economic and practical considerations.
- 7.8.2 As part of the budget consultation process options put forward may require an Equality Impact Assessment (EIA) to be undertaken.

## **7.9 Climate and Environment Impact**

7.9.1 None that is specific to this report, however, the Council has made a commitment to tackling the climate impact and spending decisions will take this into account.

## **7.10 Community Impact**

7.10.1 No distinct community impacts have been identified as a result of the proposals included in this report.

## **7.11 Crime and Disorder Impact**

7.11.1 None that is specific to this report.

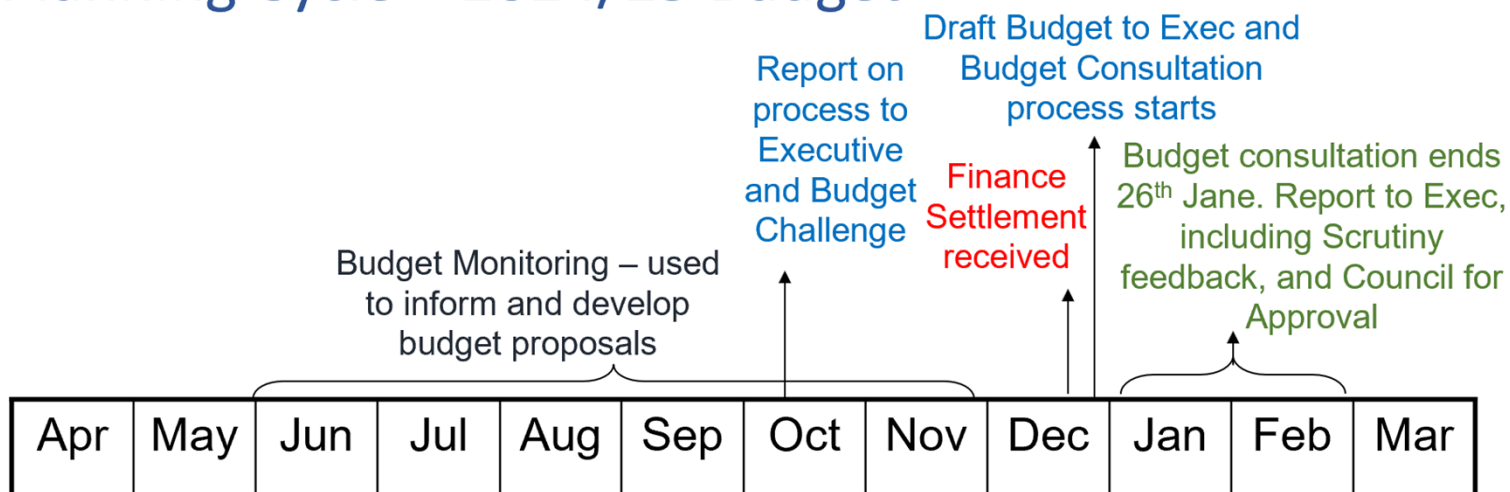
## **8 Background Papers**

---

8.1 Suite of budget reports, Council, 23<sup>rd</sup> February 2023

8.2 Budget Timeline 2024/25, Corporate Scrutiny Committee, 10<sup>th</sup> October 2023

# Financial Planning Cycle – 2024/25 Budget



Page 895

The 2024/25 Budget Cycle will be influenced by the announcements from Government, however individual authority allocations are unlikely to be made until w/c 18/12

Internal Approval for the Provisional Contract Sum for the Children's Trust (15th Jan)

This page is intentionally left blank

## EXECUTIVE 16<sup>th</sup> November 2023

|                       |  |
|-----------------------|--|
| <b>Report Title</b>   | <b>Capital Outturn 2023/24 – Draft Outturn as at Period 6</b>            |
| <b>Report Authors</b> | Janice Gotts, Executive Director of Finance and Performance              |
| <b>Lead Member</b>    | Councillor Lloyd Bunday, Executive Member for Finance and Transformation |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>              | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number for exemption from publication under Schedule 12A Local Government Act 1974</b> |   |

### List of Appendices

**Appendix A** – General Fund Monitoring

**Appendix B** – HRA Monitoring

**Appendix C** – Development Pool

### **1. Purpose of Report**

---

- 1.1 This report sets out the provisional capital outturn position for 2023/24 as at period 6 for North Northamptonshire Council (NNC), including requests to re-phase scheme expenditure profiles.
- 1.2 The report details the latest capital budgets (2023/24) for the General Fund (GF) and the Housing Revenue Account (HRA) Capital Programme, including new schemes which have been approved since 1<sup>st</sup> April 2023.

### **2. Executive Summary**

---

- 2.1 This report sets out the draft 2023/24 outturn as at period 6 for the Council's capital programme.

- 2.2 It provides commentary on the Council's current financial outturn position for 2023/24 as at period 6 for both the GF and the HRA Capital Programmes. It should also be recognised at this point that the final outturn position may be affected by any changes arising from the outstanding audits for the legacy authorities.
- 2.3 The Council will continue to assess and refine its capital profiling as part of the capital monitoring for 2023/24 prioritising schemes and focussing on deliver ability. The outturn position presented in the report is based on the best available data and information of the operations of the Council. The review of profiling of the capital programme is currently ongoing and has not been reflected within this report.

### **3. Recommendations**

---

- 3.1 It is recommended that Executive:
- a. Note the draft capital outturn position as at period 6 for the General Fund (GF) Capital Programme and Housing Revenue Account (HRA) Capital Programme for 2023/24.
  - b. Note the new schemes that have been approved since 1<sup>st</sup> April 2023.
- 3.2 Reasons for Recommendations:
- This is in line with the Council's constitution and financial regulations in relation to governance.
- 3.3 Alternative Options Considered:
- This report is on the forecasted out-turn and therefore alternative options are not proposed.

### **4. Report Background**

---

- 4.1 The Capital Programme is the Council's plan for investing in assets to efficiently deliver its statutory services, and to improve and shape the local infrastructure of North Northamptonshire, with the benefits lasting over several years.
- 4.2 Resources come from several sources including Government grants, capital receipts from surplus land and buildings, revenue contributions, other external contributions and borrowing. The Council is required to set a balanced revenue budget and therefore must ensure that where borrowing is proposed to fund the cost of capital that the cost of servicing the debt is affordable within the Council's revenue budget.



- 4.3 The Council captures its projected capital expenditure within the Capital Programme to ensure effective monitoring and ensure transparency. In year changed to the Capital Programme are approved by Executive, unless authority has been delegated or Full Council approval is required, in accordance with the Council's constitution.
- 4.4 This report provides an update to the Capital Programme 2023/24 as adopted by the Council in February 2023 and updated in subsequent reports to Executive.
- 4.5 The programme has been split into three areas:
- General Fund Committed Capital Programme containing schemes approved by Council, the majority of which are in the process of being delivered.
  - General Fund Development Pool containing schemes which are in the early stages of their lifecycle and are not ready to commence. The Development Pool comprises the schemes that the Council would be prepared to take forward, subject to final negotiations, confirmation and evidencing of funding and submission of robust business cases to the Capital Approvals Board for approval by Cabinet.
  - Housing Revenue Account Capital Programme which contains schemes that are either committed or in their early stages of their life cycle.

### **Capital Approval Process**

- 4.6 The Capital Approval Governance process aims to provide greater emphasis on the link to strategic priorities and achievement of benefits and outcomes. As part of this each submission is requested to identify any contribution to reducing carbon and/or how the development or investment will support a zero-carbon agenda.
- 4.7 The governance process requires that Directorates submit business cases to the officer led Strategic Capital Board for initial consideration. Each scheme requires approval to enter the development pool or as a commitment in the main programme. The business case must set out the requirement for funding and any funding streams available (e.g. grant), how it meets the Council's strategic priorities, risk analysis and expected outcomes and benefits.
- 4.8 The Strategic Capital Board meets monthly to scrutinise new proposals and consider the progress/risks in relation to schemes already in delivery as well as update on potential schemes which may be in the future pipeline. The board is chaired by the Executive Director of Finance and Performance and consists of the Executive Directors from each of the Directorates, the Monitoring Officer and finance/project management support.
- 4.9 In line with the agreed process, schemes progress from the Strategic Capital Board to initially be considered by the Council's Deputy Leader and the Executive Member for Finance and Transformation. Following review, the

capital scheme proposals are reported to Executive for approval each month through the Capital Update Report. If approved, such proposals will be incorporated within the Council's Capital Programme.

## 5. Issues and Choices – Forecast Outturn as at Period 6 2023/24

### Draft Capital Outturn P6 2023/24

- 5.1 The outturn forecast for 2023/24 at period 6 in respect of the GF Capital Programme shows a revised capital budget position of £85.8m, including slippage and in-year approved programmes. The outturn position is currently estimated at a spend of £64.1m, which represents movement (slippage/underspend) of £21.6m against the budget.

**Table 1**

| Directorate                                | General Fund Capital Programme 2023/2024 |                              |                  |                |               |               |               |                    |                           |
|--|--|------------------------------|------------------|----------------|---------------|---------------|---------------|--------------------|---------------------------|
|  | Original Budget                          | Draft Brought forward Budget | Approved in year | Revised Budget | YTD Actual P6 | Forecast P3   | Forecast P6   | Variance to Budget | Movement from P3 Forecast |
|  | £'000                                    | £'000                        | £'000            | £'000          | £'000         | £'000         | £'000         | £'000              | £'000                     |
| Place and Economy                          | 30,734                                   | 15,892                       | 3,803            | 50,429         | 7,641         | 39,592        | 35,495        | (14,934)           | (4,097)                   |
| Children and Education                     | 5,184                                    | 7,997                        | 4,534            | 17,715         | 2,328         | 8,897         | 13,134        | (4,581)            | 4,237                     |
| Adults, Communities and Wellbeing Services | 1,811                                    | 7,216                        | 5,634            | 14,661         | 2,970         | 10,293        | 13,327        | (1,334)            | 3,034                     |
| Enabling and Support Services              | 1,079                                    | 1,867                        | 0                | 2,946          | 186           | 2,460         | 2,160         | (786)              | (300)                     |
| <b>Total</b>                               | <b>38,808</b>                            | <b>32,972</b>                | <b>13,971</b>    | <b>85,751</b>  | <b>13,125</b> | <b>61,242</b> | <b>64,116</b> | <b>(21,635)</b>    | <b>2,874</b>              |

- 5.2 The range of schemes delivered or in progress during 2023/24 include Corby Towns Fund – 6<sup>th</sup> Form College and Train Station to Town Centre, Street Lighting upgrades, a number of school related improvements such as completion of work Prince William Academy, delivery of highways maintenance programme, Disabled Facilities Grants and the Refugee Resettlement Programme.
- 5.3 A proportion of the capital programme includes projects that were already in flight within the legacy authorities as well as new schemes. Focus has also been on those projects which have grant funding in order to ensure that any grant terms and conditions are met and minimise the potential risk of repayment and/or loss of grant.
- 5.4 The deliverability of the programme in future must also take into account the current and potential cost related to inflationary pressures. This may require some scoping changes or other mitigation if schemes are to remain within the original budget envelope.

## 5.5 General Fund Capital Programme Funding

For the General Fund capital programme funding sources have been identified to cover the MTFS capital budget requirements, including the original MTFS budget of £38.8m, together with funding for the slippage (£32.9m) and in-year approved schemes (£14m). Below shows the anticipated funding source for the in-year expenditure for 2023/24, estimated at period 6 as £64.1m.

**Table 4**

| Directorate                                | Discretionary Funding | Capital Receipts and Reserves | Capital Grants | S106         | Total         |
|--|-----------------------|-------------------------------|----------------|--------------|---------------|
|  | £'000                 | £'000                         | £'000          | £'000        | £'000         |
| Place and Economy                          | 5,291                 | 2,179                         | 27,038         | 987          | 35,495        |
| Children and Education                     | 2,705                 | 0                             | 8,901          | 1,528        | 13,134        |
| Adults, Communities and Wellbeing Services | 9,272                 | 109                           | 3,794          | 152          | 13,327        |
| Enabling and Support Services              | 214                   | 1,921                         | 25             | 0            | 2,160         |
| <b>Total</b>                               | <b>17,482</b>         | <b>4,209</b>                  | <b>39,758</b>  | <b>2,667</b> | <b>64,116</b> |

## 5.6 Development Pool

The Development Pool was fully reviewed as part of the 2023/24 MTFP work, as presented to Budget Executive on 9<sup>th</sup> February 2023. Additionally, a number of schemes were added back to the development pool as part of the 2022/23 draft out-turn report, as presented in June 2023. The current development pool is detailed in **Appendix C**.

## 5.7 HRA Capital Programme

The outturn for the HRA Capital Programme shows a revised a budget for 2023/24 of £23.4m, including slippage from 2022/23 of £8.7m. There have been no further approvals since budget setting. The outturn is showing a forecast spend of £7.4m, which represents an underspend of £15.9m compared to budget, and which will be reviewed and re-profiled considering the latest position. Detailed analysis by project shown in **Appendix B**.

**Table 5**

| HRA Capital Programme 2023/2024 |                 |                              |                  |                |               |              |              |                    |                           |
|---------------------------------|-----------------|------------------------------|------------------|----------------|---------------|--------------|--------------|--------------------|---------------------------|
| Directorate                     | Original Budget | Draft Brought forward Budget | Approved in year | Revised Budget | YTD Actual P6 | Forecast P3  | Forecast P6  | Variance to Budget | Movement from P3 Forecast |
|                                 | £'000           | £'000                        | £'000            | £'000          | £'000         | £'000        | £'000        | £'000              | £'000                     |
| <b>Corby</b>                    | 10,375          | 5,706                        | 0                | 16,081         | 1,558         | 4,501        | 4,742        | (11,339)           | 242                       |
| <b>Kettering</b>                | 4,253           | 3,012                        | 0                | 7,265          | 851           | 2,485        | 2,687        | (4,578)            | 211                       |
| <b>Total</b>                    | <b>14,627</b>   | <b>8,719</b>                 | <b>0</b>         | <b>23,346</b>  | <b>2,409</b>  | <b>6,986</b> | <b>7,429</b> | <b>(15,917)</b>    | <b>453</b>                |

5.8 A significant proportion of the budget is forecast not to be spent in 2023/24 as initially planned. Some schemes are forecast to underspend due to experiencing delays in finalising new contractual arrangements and identifying new housing development sites for new build properties which is currently being reviewed by officers.

5.9 Virements have been reflected in Appendix B for the HRA capital programme relating to the housing tenancy capital schemes, which is a ringfenced fund. The overall purpose of these budgets has not changed, which is to enhance and maintain the current housing stock.

## **6 Next Steps**

---

6.1 Monitoring of capital schemes will continue throughout the year and a further report presented to Executive at period 9.

6.2 The brought forward balances are still subject to external audit. Any adjustments required because of the outstanding audits for the Council for 2021/22 and 2022/23 will be reported back to Executive.

## **7 Implications (including financial implications)**

---

### **7.1 Resources, Financial and Transformation**

7.1.1 The financial implications are set out in the detail of the report.

### **7.2 Legal and Governance**

7.2.1 The council must utilise funding and deliver schemes in line with the restrictions and requirements as set out in the agreements linked to that funding and the requirements as set out in the Council's Constitution, in particular the budget setting and policy framework and the financial regulations.

### **7.3 Relevant Policies and Plans**

7.3.1 The schemes provide a strategic fit with the Council's priorities as set out within the Corporate Plan.

### **7.4 Risk**

7.4.1 The deliverability of the 2023/24 Capital Programme is monitored by the relevant accountable project manager and senior officer. There are a number of risks to be managed throughout the year and these are highlighted in the paragraphs below.

7.4.2 With most capital projects there is a risk that delays, and cost increases may arise as a result of the impact of inflation. Generally, this relates to the supply and price of materials with projects requiring increased lead in times. Whilst every attempt is made to cost these implications into the project, the risks remain. However, it must be recognised that the current "Cost of Living Crisis" has driven up the level of inflation, which is much higher than in previous periods and indeed when funding bids were originally submitted. This therefore poses a risk to the deliverability of the projects as originally envisaged, where reductions to the scope of projects may be required to ensure budgets are not overspent.

7.4.3 If any overspends or emerging pressures are identified during the year for whatever reason, then mitigating actions will be sought and management interventions undertaken.

7.4.4 There is a risk in relation to funding, particularly S106 where works may be required to take place in advance of S106 triggers/funding being payable. This occurs where a road or school is needed to provide infrastructure for the first residents/businesses utilising the site. Where this is the required, the Council will fund costs at risk in relation to the funding being received to reimburse its costs.

7.4.5 The brought forward figures in this report from 2022/23 remain in draft. The position is provisional as the annual statutory audit of accounts for the authority is still to be completed. Until the Statement of Accounts are signed off by the External Auditors, there could be required amendments to the carry forward balances between financial years.

### **7.5 Consultation**

7.5.1 The 2023/24 Capital Strategy and Capital Programme were subject to consultation prior to approval by the North Northamptonshire Shadow Authority in February 2020.

## 7.6 **Consideration by Executive Advisory Panel**

7.6.1 Not applicable

## 7.7 **Consideration by Scrutiny**

7.7.1 The report will be considered at a future meeting of the Finance and Resources Scrutiny Committee.

## 7.8 **Equality Implications**

7.8.1 None specific within this report

## 7.9 **Climate and Environment Impact**

7.9.1 The climate impact of each capital project will be considered and managed within the relevant scheme.

7.9.2 A number of the capital schemes include initiatives to offset/reduce carbon impact as a priority for the Council and in recognition of the Climate Emergency declared by the Council.

## 7.10 **Community Impact**

7.10.1 These proposals can be considered to have a positive impact on the community as the Capital Programme delivers the infrastructure to support, educate, connect and regenerate communities. This includes enhancing the cultural offer and promoting a positive environmental impact.

## 7.11 **Crime and Disorder Impact**

7.11.1 None specific within this report

## **8. Background Documents**

---

8.1 The following background papers can be considered in relation to this report.

Capital Programme Budget 2023/24, approved by Council on 23<sup>rd</sup> February 2023, item C/208:

[Capital Programme Report 2023-26 - Feb Council.pdf \(moderngov.co.uk\)](#)

[Appendix A - Capital Programme 2023-26.pdf \(moderngov.co.uk\)](#)

[Appendix B - HRA Capital Programme 2023-26.pdf \(moderngov.co.uk\)](#)

[6. Appendix C - Development Pool.pdf \(moderngov.co.uk\)](#)

Capital Outturn 2022/23 – Provisional Outturn as at period 12, presented to Executive 8<sup>th</sup> June 2023, item 455:

[DRAFT P12 Draft Capital Outturn Report 2022-23.pdf \(moderngov.co.uk\)](#)

[Appendix A](#)

[Appendix B](#)

Capital Outturn 2023/24 as a Period 3, presented to Executive on 17<sup>th</sup> August 2023, item 489:

[Capital Outturn 202324 as at Period 3.pdf \(moderngov.co.uk\)](#)

[Appendix A](#)

[Appendix B](#)

[Appendix C](#)

This page is intentionally left blank



# Appendix A

| Appendix A  | General Fund Capital Programme |               |                  |                |              |               |               |                    |                           |  |
|---|--------------------------------|---------------|------------------|----------------|--------------|---------------|---------------|--------------------|---------------------------|--|
|   | Original Budget                | Budget C/fwd  | Approved in year | Revised Budget | P6 Actuals   | P3 Forecast   | P6 Forecast   | Variance to Budget | Movement from P3 Forecast |  |
|   | £'000                          | £'000         | £'000            | £'000          | £'000        | £'000         | £'000         | £'000              | £'000                     |  |
| <b>DIRECTORATE - PLACE</b>  |                                |               |                  |                |              |               |               |                    |                           |  |
| A509 Isham By pass  | 0                              | 837           | 0                | 837            | 664          | 837           | 837           | 0                  | 0                         |  |
| S106 Highways   | 500                            | 128           | 0                | 628            | 0            | 128           | 128           | (500)              | 0                         |  |
| Street Lighting LED Upgrade                                       | 2,157                          | 3,033         | 0                | 5,190          | 0            | 2,480         | 2,688         | (2,502)            | 208                       |  |
| Highways DFT LTP Integrated Transport Block 2023-24               | 2,102                          | 210           | 0                | 2,312          | 0            | 1,500         | 1,500         | (812)              | 0                         |  |
| Highways DFT Pothole Fund 2023-24                                 | 3,735                          | 793           | 0                | 4,528          | 0            | 4,528         | 4,528         | 0                  | 0                         |  |
| Highways DFT Incentive Block 2023-24                              | 934                            | 311           | 0                | 1,245          | 0            | 1,245         | 1,245         | 0                  | 0                         |  |
| Highways DFT Maintenance Block 2023-24                            | 3,735                          | 185           | 0                | 3,920          | 0            | 3,920         | 3,920         | 0                  | 0                         |  |
| Pothole repair additional funding 2023-24                         | 0                              | 0             | 1,494            | 1,494          | 0            | 1,494         | 1,494         | 0                  | 0                         |  |
| High Street - Heritage Action Zone                                | 0                              | 195           | 371              | 566            | 277          | 195           | 566           | 0                  | 371                       |  |
| HG0220 - Northamptonshire Superfast Broadband                     | 562                            | 550           | 0                | 1,112          | (74)         | 1,111         | 1,111         | (1)                | 0                         |  |
| Corby Town Fund Multi-Use Building                                | 0                              | 0             | 787              | 787            | 0            | 712           | 125           | (662)              | (587)                     |  |
| Corby Town Fund - 6th Form College                                | 4,750                          | 2,179         | 0                | 6,929          | 2,446        | 6,929         | 6,929         | 0                  | 0                         |  |
| Corby Town Fund - Train Station to Town Centre                    | 6,300                          | 100           | 0                | 6,400          | 0            | 2,010         | 750           | (5,650)            | (1,260)                   |  |
| Priors Hall Sustainable Urban extension - A43/Steel Road junction | 0                              | 996           | 0                | 996            | 0            | 996           | 150           | (846)              | (846)                     |  |
| East Kettering (Hanwood Park) S106 Highways works                 | 1,674                          | (23)          | 0                | 1,651          | 0            | 1,651         | 0             | (1,651)            | (1,651)                   |  |
| Property Stock Improvement & Compliance                           | 326                            | 337           | 0                | 663            | 8            | 663           | 663           | 0                  | 0                         |  |
| Compulsory Purchase Order Fund                                    | 601                            | 0             | 0                | 601            | 0            | 601           | 601           | 0                  | 0                         |  |
| Garden Communities  | 0                              | 1,428         | 0                | 1,428          | 0            | 1,428         | 500           | (928)              | (928)                     |  |
| Disabled Facilities Grant NNC                                     | 2,200                          | 0             | 0                | 2,200          | 932          | 2,500         | 2,500         | 300                | 0                         |  |
| Private Sector Housing - Home Repairs Grants                      | 0                              | 661           | 0                | 661            | 12           | 45            | 45            | (616)              | 0                         |  |
| All other schemes (individual budgets under £500k)                | 1,158                          | 3,972         | 1,151            | 6,281          | 3,377        | 4,619         | 5,215         | (1,066)            | 596                       |  |
| <b>TOTAL PLACE</b>  | <b>30,734</b>                  | <b>15,892</b> | <b>3,803</b>     | <b>50,429</b>  | <b>7,641</b> | <b>39,592</b> | <b>35,495</b> | <b>(14,934)</b>    | <b>(4,097)</b>            |  |

|  | Original Budget | Budget C/fwd | Approved in year | Revised Budget | P6 Actuals   | P3 Forecast  | P6 Forecast   | Variance to Budget | Movement from P3 Forecast |
|--|-----------------|--------------|------------------|----------------|--------------|--------------|---------------|--------------------|---------------------------|
|  | £'000           | £'000        | £'000            | £'000          | £'000        | £'000        | £'000         | £'000              | £'000                     |
| <b>DIRECTORATE - CHILDREN AND EDUCATION</b>            |                 |              |                  |                |              |              |               |                    |                           |
| Prince William School phase 3 works                    | 0               | 3,813        | 0                | 3,813          | 0            | 1,144        | 3,813         | 0                  | 2,669                     |
| Earls Barton School S106 works                         | 1,290           | 204          | 0                | 1,494          | 50           | 1,061        | 1,000         | (494)              | (61)                      |
| Isebrook SEND College expansion - four seasons         | 0               | 827          | 0                | 827            | 273          | 822          | 822           | (5)                | 0                         |
| Wollaston Secondary SEND Unit                          | 0               | 0            | 561              | 561            | 369          | 561          | 561           | 0                  | 0                         |
| Schools Minor Works 2022-2024                          | 1,947           | 1,432        | 0                | 3,379          | 117          | 1,223        | 1,569         | (1,810)            | 346                       |
| Huxlow S106 Minor Works                                | 0               | 0            | 554              | 554            | 294          | 0            | 330           | (224)              | 330                       |
| Rowan Gate Special School mobile to permanent          | 1,006           | 153          | 0                | 1,159          | 65           | 1,006        | 1,006         | (153)              | 0                         |
| Kingswood Secondary Bulge                              | 341             | 213          | 0                | 554            | 98           | 213          | 213           | (341)              | 0                         |
| Avenue Infants School SEND provision                   | 0               | 0            | 727              | 727            | 0            | 0            | 100           | (627)              | 100                       |
| Great Doddington Primary School mobile replacement     | 0               | 0            | 897              | 897            | 0            | 0            | 50            | (847)              | 50                        |
| Children's Trust Planned Capital Maintenance Programme | 600             | 225          | 0                | 825            | 2            | 825          | 825           | 0                  | 0                         |
| Children's Residential Home Provision                  | 0               | 762          | 0                | 762            | 0            | 762          | 762           | 0                  | 0                         |
| All other schemes (individual budgets under £500k)     | 0               | 368          | 1,795            | 2,163          | 1,061        | 1,280        | 2,083         | (80)               | 803                       |
| <b>TOTAL CHILDREN AND EDUCATION</b>                    | <b>5,184</b>    | <b>7,997</b> | <b>4,534</b>     | <b>17,715</b>  | <b>2,328</b> | <b>8,897</b> | <b>13,134</b> | <b>(4,581)</b>     | <b>4,237</b>              |

|  | Original Budget | Budget C/fwd | Approved in year | Revised Budget | P6 Actuals   | P3 Forecast   | P6 Forecast   | Variance to Budget | Movement from P3 Forecast |
|--|-----------------|--------------|------------------|----------------|--------------|---------------|---------------|--------------------|---------------------------|
|  | £'000           | £'000        | £'000            | £'000          | £'000        | £'000         | £'000         | £'000              | £'000                     |
| <b>DIRECTORATE - ADULTS, COMMUNITIES &amp; WELLBEING</b> |                 |              |                  |                |              |               |               |                    |                           |
| Community equipment capitalisation                       | 540             | 0            | 0                | 540            | 0            | 540           | 540           | 0                  | 0                         |
| Rough Sleepers Accommodation (RSAP)                      | 0               | 542          | 0                | 542            | 552          | 542           | 542           | 0                  | 0                         |
| Refugee Resettlement Programme (Phase 1)                 | 0               | 3,711        | 3,234            | 6,945          | 2,168        | 6,945         | 6,945         | 0                  | 0                         |
| Refugee Resettlement Programme (Phase 2)                 | 0               | 0            | 3,298            | 3,298          | 0            | 0             | 3,298         | 0                  | 3,298                     |
| Housing and Homelessness Prevention                      | 1,000           | 1,000        | (1,000)          | 1,000          | 61           | 498           | 498           | (502)              | 0                         |
| All other schemes (individual budgets under £500k)       | 271             | 1,963        | 102              | 2,336          | 190          | 1,768         | 1,504         | (832)              | (264)                     |
| <b>TOTAL ADULTS, COMMUNITIES &amp; WELLBEING</b>         | <b>1,811</b>    | <b>7,216</b> | <b>5,634</b>     | <b>14,661</b>  | <b>2,970</b> | <b>10,293</b> | <b>13,327</b> | <b>(1,334)</b>     | <b>3,034</b>              |

|  | Original Budget | Budget C/fwd | Approved in year | Revised Budget | P6 Actuals | P3 Forecast  | P6 Forecast  | Variance to Budget | Movement from P3 Forecast |
|--|-----------------|--------------|------------------|----------------|------------|--------------|--------------|--------------------|---------------------------|
|  | £'000           | £'000        | £'000            | £'000          | £'000      | £'000        | £'000        | £'000              | £'000                     |
| <b>DIRECTORATE - ENABLING SERVICES</b>             |                 |              |                  |                |            |              |              |                    |                           |
| Revenues & Benefits System                         | 0               | 720          | 0                | 720            | 92         | 600          | 600          | (120)              | 0                         |
| IT Strategy  | 559             | 0            | 0                | 559            | 0          | 559          | 559          | 0                  | 0                         |
| Infrastructure / Flexi & Remote Working            | 220             | 330          | 0                | 550            | 0          | 550          | 550          | 0                  | 0                         |
| All other schemes (individual budgets under £500k) | 300             | 817          | 0                | 1,117          | 94         | 751          | 451          | (666)              | (300)                     |
| <b>TOTAL ENABLING</b>                              | <b>1,079</b>    | <b>1,867</b> | <b>0</b>         | <b>2,946</b>   | <b>186</b> | <b>2,460</b> | <b>2,160</b> | <b>(786)</b>       | <b>(300)</b>              |

|   | Original Budget | Budget C/fwd  | Approved in year | Revised Budget | P6 Actuals    | P3 Forecast   | P6 Forecast   | Variance to Budget | Movement from P3 Forecast |
|---|-----------------|---------------|------------------|----------------|---------------|---------------|---------------|--------------------|---------------------------|
|   | £'000           | £'000         | £'000            | £'000          | £'000         | £'000         | £'000         | £'000              | £'000                     |
| <b>TOTAL GENERAL FUND CAPITAL PROGRAMME</b> | <b>38,808</b>   | <b>32,972</b> | <b>13,971</b>    | <b>85,751</b>  | <b>13,125</b> | <b>61,242</b> | <b>64,116</b> | <b>(21,635)</b>    | <b>2,874</b>              |

This page is intentionally left blank

## Appendix B

| Directorate - Housing                |   | Original Budget | Revised Budget C/fwd. | Approved Budget in year | Virements | Revised Budget | P6 Actual    | P3 Forecast  | P6 Forecast  | Variance to Budget | Movement to P6 |
|--------------------------------------|---|-----------------|-----------------------|-------------------------|-----------|----------------|--------------|--------------|--------------|--------------------|----------------|
|                                      |   | £'000           | £'000                 | £'000                   | £'000     | £'000          | £'000        | £'000        | £'000        | £'000              | £'000          |
| <b>Housing Corby</b>                 |   |                 |                       |                         |           |                |              |              |              |                    |                |
| New Build                            | New Build                                 | 5,500           | 3,593                 |                         |           | 9,093          | 500          | 350          | 1,500        | (7,593)            | 1,150          |
| Hidden Homes                         |   | 200             |                       |                         |           | 200            | 17           | 200          | 200          | 0                  | 0              |
| Estate Management                    |   | 250             |                       |                         |           | 250            | 69           | 150          | 150          | (100)              | 0              |
| Roof Renewals                        |   | 350             |                       |                         |           | 350            | 61           | 150          | 150          | (200)              | 0              |
| Electrical Upgrades                  | Decent Homes - Electrical Upgrades        | 385             | 1,024                 |                         | (244)     | 1,165          | 153          | 385          | 385          | (780)              | 0              |
| Heating Upgrades                     | Central Heating Renewal                   | 350             | 303                   |                         |           | 653            | 212          | 350          | 350          | (303)              | 0              |
| Compliance                           | Health & Safety and Fire Precautions      | 200             | 562                   |                         |           | 762            | 47           | 91           | 93           | (669)              | 3              |
| Disabled Adaptations                 | Improving access for disabled people      | 250             | (58)                  |                         |           | 192            | 102          | 250          | 192          | 0                  | (58)           |
| Supply Chain Upgrades                | Property Stores Project                   | 40              | 79                    |                         |           | 119            | 33           | 40           | 0            | (119)              | (40)           |
| Kitchen & Bathrooms                  | Decent Homes - Kitchen & Bathroom Renewal | 300             | (107)                 |                         |           | 193            | 102          | 206          | 193          | (0)                | (13)           |
| Doors & Windows                      | External Door Replacements                | 250             | (24)                  |                         |           | 226            | 50           | 129          | 129          | (97)               | 0              |
| HRA - Unallocated Labour & Overheads | Unallocated Labour                        | 1,500           | 278                   |                         | 0         | 1,778          | 5            | 1,500        | 1,000        | (778)              | (500)          |
| HRA Housing Management System [CBC]  | HRA Housing Management System [CBC]       |                 | 20                    |                         |           | 20             | 10           |              | 0            | (20)               | 0              |
| Major Voids Works                    |   | 400             | (244)                 |                         | 244       | 400            | 186          | 400          | 400          | 0                  | 0              |
| Sheltered Housing                    |   | 200             |                       |                         |           | 200            | 10           | 200          | 200          | 0                  | 0              |
| Energy Improvements                  |   | 200             | 280                   |                         |           | 480            | 0            | 100          | 100          | (380)              | 0              |
| <b>Total Corby Housing</b>           |   | <b>10,375</b>   | <b>5,707</b>          | <b>0</b>                | <b>0</b>  | <b>16,081</b>  | <b>1,558</b> | <b>4,501</b> | <b>5,042</b> | <b>(11,039)</b>    | <b>542</b>     |

| Directorate - Housing                           |  | Original Budget | Revised Budget C/fwd. | Approved Budget in year | Virements | Revised Budget | P6 Actual    | P3 Forecast  | P6 Forecast  | Variance to Budget | Movement to P9 |
|---|--|-----------------|-----------------------|-------------------------|-----------|----------------|--------------|--------------|--------------|--------------------|----------------|
| <b>Kettering Housing</b>                        |  |                 |                       |                         |           |                |              |              |              |                    |                |
| Kitchens & Bathrooms (Kettering)                |  | 400             | 163                   | 0                       | (400)     | 163            | 32           | 200          | 100          | (63)               | (100)          |
| Heating Upgrades (Kettering)                    |  | 400             | 73                    | 0                       | 0         | 473            | 198          | 400          | 400          | (73)               | 0              |
| Roof Renewals (Kettering)                       |  | 200             | 175                   | 0                       | 0         | 375            | 13           | 150          | 100          | (275)              | (50)           |
| Disabled Adaptations (Kettering)                |  | 225             | (50)                  | 0                       | 0         | 175            | 26           | 125          | 125          | (50)               | 0              |
| Electrical Upgrades (Kettering)                 |  | 300             | 114                   | 0                       | 0         | 414            | 145          | 326          | 326          | (88)               | 0              |
| External Doors & Windows (Kettering)            |  | 300             | 11                    | 0                       | 0         | 311            | 1            | 200          | 150          | (161)              | (50)           |
| Major Void Works (Kettering)                    |  | 250             | (84)                  | 0                       | 84        | 250            | 263          | 250          | 250          | 0                  | 0              |
| Energy Improvements (Kettering)                 |  | 200             | 218                   | 0                       | 0         | 418            | 0            | 100          | 100          | (318)              | 0              |
| Sheltered Housing Communal Upgrades (Kettering) |  | 50              | 47                    | 0                       | 0         | 97             | 8            | 50           | 50           | (47)               | 0              |
| Estate Maintenance (Kettering)                  |  | 100             | 116                   | 0                       | 0         | 216            | 50           | 100          | 100          | (116)              | 0              |
| Compliance (Kettering)                          |  | 60              | (13)                  | 0                       | 13        | 60             | 32           | 60           | 60           | (0)                | 0              |
| Supply Chain Upgrades (Kettering)               |  | 25              |                       |                         |           | 25             | 10           | 25           | 25           | 0                  | 0              |
| Homes for the Future (Kettering)                |  | 758             | 104                   |                         | 0         | 862            | 56           | 350          | 200          | (662)              | (150)          |
| Hidden Homes (Kettering)                        |  |                 | (101)                 | 0                       | 303       | 202            | 9            | 150          | 202          | 0                  | 52             |
| New Build                                       |  | 985             | 2,239                 | 0                       | 0         | 3,224          | 9            | 0            | 500          | (2,724)            | 500            |
| <b>Total Kettering Housing</b>                  |  | <b>4,253</b>    | <b>3,012</b>          | <b>0</b>                | <b>0</b>  | <b>7,265</b>   | <b>851</b>   | <b>2,485</b> | <b>2,687</b> | <b>(4,578)</b>     | <b>211</b>     |
|   |  |                 |                       |                         |           |                |              |              |              |                    |                |
| <b>Total Housing Revenue Account</b>            |  | <b>14,627</b>   | <b>8,719</b>          | <b>0</b>                | <b>0</b>  | <b>23,346</b>  | <b>2,409</b> | <b>6,986</b> | <b>7,729</b> | <b>(15,617)</b>    | <b>753</b>     |

**Appendix C**

**Development Pool Forecast Expenditure 2023-24 Onwards**

| Scheme                                    | Directorate            | Scheme Description  | 2023-24<br>£000's | 2024-25<br>£000's | 2025-26<br>£000's | Total £000's | Funding Source |
|---|------------------------|---|-------------------|-------------------|-------------------|--------------|----------------|
| New Primary Schools                       | Children and Education | Glenvale and Priors Hall  | 6,000             | 6,000             | 600               | 12,600       | S106           |
| New Secondary Schools                     | Children and Education | Hanwood Park and Weldon village   | 10,000            | 20,000            | 20,000            | 50,000       | S106           |
| S106 Funded School Expansions             | Children and Education | Expansions at Huxlow, Oakley Vale, Desborough and West Hill   | -                 | 650               | 9,000             | 9,650        | S106           |
| Alfred Street/Tennison Road Amalgamation  | Children and Education | Merger of two schools   | 1,040             | -                 | -                 | 1,040        | DFE            |
| Sir Christopher Hatton Secondary School   | Children and Education | Expansion   | 1,761             | -                 | -                 | 1,761        | DFE/S106       |
| Various SEND schemes                      | Children and Education | Schemes to provide new SEND capacity to meet demand across North Northants                                    | 7,599             | 4,352             | 150               | 15,440       | DFE            |
| Devolved Formula Capital                  | Children and Education | Maintained schools capital grant, allocated by school by DFE.   | -                 | 302               | 300               | 908          | DFE            |
| Schools Strategic Repairs and Maintenance | Children and Education | Funded from 'Schools Condition Allocation' Grant based on condition surveys for maintained schools.           | -                 | 1,000             | 1,000             | 2,000        | DFE            |
| Tithe Barn Road Office Refurbishment      | Place                  | As described.   | -                 | 2,421             | -                 | 2,421        | Discretionary  |
| New Depot                                 | Place                  | As described.   | -                 | 2,750             | 750               | 3,500        | Discretionary  |
| Recycling Project / Facility              | Place                  | As described.   | -                 | 2,876             | 2,500             | 5,376        | Discretionary  |
| LTP Maintenance                           | Place                  | Non ring-fenced DfT grant for the maintenance of highways assets.   | -                 | 3,735             | 3,735             | 7,470        | DfT            |
| LTP Integrated Transport                  | Place                  | Non ring-fenced DfT grant for small scale improvements delivering the objectives of the Local Transport Plan. | -                 | 1,551             | 1,551             | 3,102        | DfT            |

| Scheme   | Directorate | Scheme Description  | 2023-24<br>£000's | 2024-25<br>£000's | 2025-26<br>£000's | Total £000's | Funding Source     |
|--|-------------|---|-------------------|-------------------|-------------------|--------------|--------------------|
| Incentive fund   | Place       | Non ring-fenced DfT grant for the maintenance of highways assets.   | -                 | 934               | 934               | 1,868        | DfT                |
| Pothole Fund   | Place       | Ring-fenced DfT grant for the repair of potholes.   | -                 | 3,735             | 3,735             | 7,470        | DfT                |
| A509 Wellingborough Development Link Phase 1 (Isham Bypass)              | Place       | Road scheme.  | 7,552             | 12,787            | 30,656            | 50,995       | DfT, Developer, LA |
| A43 Northampton to Kettering Phase 3 (Overstone Grange to Holcot/Sywell) | Place       | Dualling of the A43 Northampton to Kettering (his section spans the boundary between Daventry and Wellingborough).  | 432               | 832               | 2,297             | 3,561        | DfT, Developer, LA |
| Flood Alleviation  | Place       | As bid for from Environment Agency and funding secured from external bodies e.g. Anglian Water.   | -                 | 250               | 250               | 500          | External Funding   |
| Estate Stock Condition and compliance works                              | Place       | Expenditure on NCC properties relating to replacement and repair of boiler and ventilation systems, roofs and building fabric works. Also covers health and safety, water quality and fire regulations requirements.                                  | 1,000             | 1,000             | 1,000             | 3,000        | Capital Receipts   |
| Public Health Schemes  | Place       | Awaiting confirmation of funding approval   | -                 | 101               | -                 | 101          | Grant              |
| Corby Town Fund  | Place       | Deliver of four projects Sixth Form College, Corby Station Link, Smart and Connected Corby and Multi-Use building.  | -                 | -                 | -                 | 1,735        | External /s.106    |
| UK Shared Prosperity Fund  | Place       | Grant bid left behind   | -                 | -                 | -                 | 1,495        | Grant              |
| Levelling Up Fund  | Place       | Two bids submitted one for Transformation through Green Growth (Stanton Cross R6 overbridge) Chester House Phase 2 and the Greenway) and for Improving Life Chances (Adrenaline Alley, Corby Station Link and Queensway, Wellingborough regeneration) | -                 | -                 | -                 | -            | Grant              |
| Grounds Maintenance Equipment replacement                                | Place       | Capital budget to renew grounds maintenance equipment   | -                 | -                 | -                 | 400          | Discretionary      |
| Electric Vehicle charging points CIC & CEC                               | Place       | Supply and installation of electric vehicle charging points for tenants use (includes previous Electric Charging scheme)  | -                 | 134               | -                 | 134          | Capital Receipts   |
| Future Way of Working Assets Implementation                              | Place       | Capital budget to implement accommodation changes as part of the Future Way of Working implementation plan  | -                 | 1,500             | -                 | 1,500        | Discretionary      |
| Ladbrook Reservoir   | Place       | Further phase of capital works to the reservoir to meet the councils statutory duties.  | -                 | 330               | -                 | 330          | Grant              |
| Local Authority Tree Fund 2024/25  | Place       | Grant funding for tree planting in open space   | -                 | -                 | 80                | 80           | Grant              |

| Scheme                                | Directorate | Scheme Description  | 2023-24<br>£000's | 2024-25<br>£000's | 2025-26<br>£000's | Total £000's   | Funding Source                 |
|---------------------------------------|-------------|---|-------------------|-------------------|-------------------|----------------|--------------------------------|
| Play Area investment in Country Parks | Place       | To invest in new play equipment to support growth in parking income.  | -                 | 300               | -                 | 300            | s.106                          |
| Public Sector Decarbonisation Fund    | Place       | Bid for external funds to decarbonise the Council's estate  | -                 | 1,000             | -                 | 1,000          | Grant                          |
| Future Fleet (ex BCW Norse)           | Place       |   | -                 | 397               | -                 | 397            | Discretionary                  |
| Residential Zones/CPE                 | Place       |   | -                 | 20                | -                 | 20             | Discretionary                  |
| CPO Fund                              | Place       | Potential repurpose for Smiths land scheme  | -                 | 601               | -                 | 601            | Capital Receipts               |
| Device Management                     | Enabling    | End of life replacement.  | -                 | -                 | -                 | -              | Discretionary                  |
| Northants Care Record                 | Adults      | Integrating systems into the NHCP Northants Care Record for a single view of the patient/citizen for social workers and clinicians. | 50                | -                 | -                 | 50             | Discretionary                  |
| Leisure and Tourism Projects          | Adults      | Pemberton, Splash and Nene Leisure Centres  | 15                | -                 | -                 | 15             | Discretionary                  |
| Social Care System Replacement        | Adults      |   | -                 | 939               | -                 | 939            | Discretionary                  |
| Castle Theatre                        | Adults      |   | -                 | 740               | -                 | 740            | Capital Receipts               |
| Rockingham Road Pavilion              | Adults      |   | -                 | 300               | -                 | 300            | Discretionary                  |
| Empty Properties                      | Adults      |   | -                 | 308               | -                 | 308            | Capital Receipts               |
| Burton Latimer Community Leisure      | Adults      |   | -                 | 790               | -                 | 790            | Grant & External Contributions |
| Corporate Systems                     | Enabling    | Mainly Corporate IT Systems   | 243               | -                 | -                 | 243            | Discretionary                  |
| <b>Totals</b>                         |             |   | <b>35,692</b>     | <b>72,635</b>     | <b>78,538</b>     | <b>194,140</b> |                                |

|                       |               |               |               |                |
|-----------------------|---------------|---------------|---------------|----------------|
| Discretionary Funding | 308           | 11,203        | 3,250         | 15,161         |
| Capital Receipts      | 1,000         | 2,783         | 1,000         | 4,783          |
| Grant Funding         | 18,384        | 31,699        | 44,688        | 99,911         |
| S106                  | 16,000        | 26,950        | 29,600        | 74,285         |
| <b>Total</b>          | <b>35,692</b> | <b>72,635</b> | <b>78,538</b> | <b>194,140</b> |

Page 13  
 013

This page is intentionally left blank





## EXECUTIVE 16<sup>th</sup> November 2023

|                      |   |
|----------------------|---|
| <b>Report Title</b>  | <b>Half Yearly Treasury Management Update</b>   |
| <b>Report Author</b> | Janice Gotts, Executive Director of Finance and Performance<br><a href="mailto:Janice.gotts@northnorthants.gov.uk">Janice.gotts@northnorthants.gov.uk</a> |
| <b>Lead Member</b>   | Cllr Lloyd Bunday, Executive Member for Finance and Transformation  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>              | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number for exemption from publication under Schedule 12A Local Government Act 1974</b> |   |

### List of Appendices

#### **Appendix A – Treasury Management Mid-Year Report to 30 September 2023**

##### **1. Purpose of Report**

---

- 1.1. This report updates the Council's treasury management and prudential indicators following progress on the disaggregation of the assets and liabilities that were previously held by North Northamptonshire Council.
- 1.2. This report also updates the Committee on the Council's treasury management activities and performance for the first half of the financial year ended 30 September 2023 in accordance with the CIPFA's Code of Practice on Treasury Management.

##### **2. Executive Summary**

---

- 2.1. This report requires the Committee to note the outcome of the Council's treasury management activities and performance for the first half of the financial year ended 30<sup>th</sup> September 2023.

### **3. Recommendations**

---

- 3.1. It is recommended that the Executive;
  - a. Note the activity undertaken during the first half of the financial year ended 30<sup>th</sup> September 2023 and the performance achieved set out in Appendix A to this report: and
  - b. Note that all treasury activities were undertaken in line with the approved Treasury Management Strategy/Annual Investment Strategy.
- 3.2. Reason for Recommendations: The Council's TMSS is underpinned by the CIPFA Code of Practice on Treasury Management ("the Code") which requires that members are informed of treasury management activities at least twice a year. Full Council has delegated the formulation and monitoring of the Council's treasury management strategy, policy and activity to the Executive Committee.
- 3.3. Alternative Options Considered - This report is for information and there are no alternative options for consideration.

### **4. Report Background**

---

- 4.1. The Council operates a balanced budget, which broadly means cash raised during the year will meet its cash expenditure. Part of the treasury management operations ensure this cash flow is adequately planned, with surplus monies being invested in low-risk counterparties, providing adequate liquidity initially before considering optimising investment return.
- 4.2. The second function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning to ensure the Council can meet its capital spending operations. This management of longer-term cash may involve arranging long or short-term loans, or using longer term cash flow surpluses, and on occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.
- 4.3. Accordingly, treasury management is defined as:

"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."
- 4.4. In line with the Code and the requirement of the Council's Treasury Management Strategy, this report provides an update on the borrowing, investments and cash flows, money market and capital market activities to 30<sup>th</sup> September 2023.

## **5. Issues and Choices**

---

- 5.1. In line with its delegated authority, the Executive is asked to note the treasury management activities and performance to 30<sup>th</sup> September 2023.

## **6. Next Steps**

---

- 6.1. The Year End Treasury Management Report will be brought to the Executive after 31<sup>st</sup> March 2024.

## **7. Implications (including financial implications)**

---

### **7.1. Resources and Financial**

- 7.1.1. The financial implications are set out within the report.

### **7.2. Legal**

- 7.2.1. This report must be considered by the Executive in line with its delegated authority from Full Council.

### **7.3. Risk**

- 7.3.1. The financial risks arising from this report are set out within the report.

### **7.4. Relevant Policies and Plans**

- 7.4.1. The report is in line with the Treasury Management Strategy Statement, as approved by Full Council as part of the 2023/24 General Fund Budget and Medium Term Financial Plan on 23<sup>rd</sup> February 2023.

### **7.4. Consultation**

- 7.4.1. None specific to this report.

### **7.5. Consideration by the Executive Advisory Panel**

- 7.5.1. Not applicable.

### **7.6. Consideration by Scrutiny**

- 7.6.1. Not applicable.

## **7.8. Equality Implications**

7.8.1 None specific within this report.

## **7.9 Climate and Environment Impact**

7.9.1 None specific to this report.

## **7.10 Community Impact**

7.10.1 None specific to this report.

## **7.11 Crime and Disorder Impact**

7.11.1 Nothing specific within this report.

## **8 Background Papers**

---

8.8 General Fund Budget 2023-24 and Medium Term Financial Plan, Council 23<sup>rd</sup> February Item C/206: [Agenda item - General Fund Budget 2023-24 and Medium-Term Financial Plan - North Northamptonshire Council \(modern.gov.co.uk\)](https://modern.gov.co.uk/agenda-item-general-fund-budget-2023-24-and-medium-term-financial-plan-north-northamptonshire-council)

## Appendix A

### Treasury Management Mid-Year Report - 2023/24

#### 1. Introduction

- 1.1. In February 2021 the Authority adopted the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice* (the CIPFA Code) which requires the Authority to approve, as a minimum, treasury management semi-annual and annual outturn reports.
- 1.2. This report includes the new requirement in the 2021 Code, mandatory from 1<sup>st</sup> April 2023, of quarterly reporting of the treasury management prudential indicators. The non-treasury prudential indicators are incorporated in the Authority's normal quarterly revenue and capital monitoring report.
- 1.3. The Authority's treasury management strategy for 2023/24 was approved at a meeting on 23 February 2023. The Authority has borrowed and/or invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Authority's treasury management strategy.

#### 2. External Context

- 2.1. **Economic background:** UK inflation remained stubbornly high over much the period compared to the US and euro zone, keeping expectations elevated of how much further the Bank of England (BoE) would hike rates compared to the regions. However, inflation data published in the latter part of the period undershot expectations, causing financial markets to reassess the peak in BoE Bank Rate. This was followed very soon after by the BoE deciding to keep Bank Rate on hold at 5.25% in September, against expectation for another 0.25% rise.
- 2.2. Economic growth in the UK remained relatively weak over the period. In calendar Q2 2023, the economy expanded by 0.2%. However, monthly GDP data showed a 0.5% contraction in July, the largest fall to date in 2023 and worse than the 0.2% decline predicted which could be an indication the monetary tightening cycle is starting to cause recessionary or at the very least stagnating economic conditions.
- 2.3. July data showed the unemployment rate increased to 4.3% (3mth/year) while the employment rate rose to 75.5%. Pay growth was 8.5% for total pay (including bonuses) and 7.8% for regular pay, which for the latter was the highest recorded annual growth rate. Adjusting for inflation, pay growth in real terms were positive at 1.2% and 0.6% for total pay and regular pay respectively.

- 2.4. Inflation continued to fall from its peak as annual headline CPI declined to 6.7% in July 2023 from 6.8% in the previous month against expectations for a tick back up to 7.0%. The largest downward contribution came from food prices. The core rate also surprised on the downside, falling to 6.2% from 6.9% compared to predictions for it to only edge down to 6.8%.
- 2.5. The Bank of England's Monetary Policy Committee continued tightening monetary policy over most of the period, taking Bank Rate to 5.25% in August. Against expectations of a further hike in September, the Committee voted 5-4 to maintain Bank Rate at 5.25%. Each of the four dissenters were in favour of another 0.25% increase.
- 2.6. Financial market Bank Rate expectations moderated over the period as falling inflation and weakening data gave some indication that higher interest rates were working. Expectations fell from predicting a peak of over 6% in June to 5.5% just ahead of the September MPC meeting, and to then expecting 5.25% to be the peak by the end of the period.
- 2.7. Following the September MPC meeting, Arlingclose, the authority's treasury adviser, modestly revised its interest forecast to reflect the central view that 5.25% will now be the peak in Bank Rate. In the short term the risks are to the upside if inflation increases again, but over the remaining part of the time horizon the risks are to the downside from economic activity weakening more than expected.
- 2.8. The lagged effect of monetary policy together with the staggered fixed term mortgage maturities over the next 12-24 months means the full impact from Bank Rate rises are still yet to be felt by households. Higher rates will also impact business and according to industry survey data, the UK manufacturing and services sector contracted during the quarter with all measures scoring under 50, indicating contraction in the sectors.
- 2.9. The US Federal Reserve increased its key interest rate to 5.25-5.50% over the period, pausing in September following a 0.25% rise the month before, and indicating that there may be further monetary tightening in future.
- 2.10. Having fallen throughout 2023, annual US inflation started to pick up again in July 2023, rising from 3% in June, which represented the lowest level since March 2021, to 3.2% in July and then jumping again to 3.7% in August, beating expectations for a rise to 3.6%. Rising oil prices were the main cause of the increase. US GDP growth registered 2.1% annualised in the second calendar quarter of 2023, down from the initial estimate of 2.4% but above the 2% expansion seen in the first quarter.
- 2.11. The European Central Bank increased its key deposit, main refinancing, and marginal lending interest rates to 4.00%, 4.50% and 4.75% respectively in September, and hinted these levels may represent the peak in rates but also emphasising rates would stay high for as long as required to bring inflation down to target.
- 2.12. Although continuing to decline steadily, inflation has been sticky, Eurozone annual headline CPI fell to 5.2% in August while annual core inflation eased to 5.3% having stuck at 5.5% in the previous two months. GDP growth remains weak, with recent data showing the region expanded by only 0.1% in the three months to June 2023, the rate as the previous quarter.

- 2.13. **Financial markets:** Financial market sentiment and bond yields remained volatile, with the latter generally trending downwards as there were signs inflation, while still high, was moderating and interest rates were at a peak.
- 2.14. Gilt yields fell towards the end of the period. The 5-year UK benchmark gilt yield rose from 3.30% to peak at 4.91% in July before trending downwards to 4.29%, the 10-year gilt yield rose from 3.43% to 4.75% in August before declining to 4.45%, and the 20-year yield from 3.75% to 4.97% in August and then fell back to 4.84%. The Sterling Overnight Rate (SONIA) averaged 4.73% over the period.
- 2.15. **Credit review:** Having completed a review of its credit advice on unsecured deposits at UK and non-UK banks following concerns of a wider financial crisis after the collapse of Silicon Valley Bank purchase of Credit Suisse by UBS, as well as other well-publicised banking sector issues, in March Arlingclose reduced the advised maximum duration limit for all banks on its recommended counterparty list to 35 days. This stance continued to be maintained at the end of the period.
- 2.16. Having put the US sovereign rating on Rating Watch Negative earlier in the period, Fitch took further action in August, downgrading the long-term rating to AA+, partly around ongoing debt ceiling concerns but also an expected fiscal deterioration over the next couple of years.
- 2.17. Following the issue of a Section 114 notice, in September Arlingclose advised against undertaking new lending to Birmingham City Council, and later in the month cut its recommended duration on Warrington Borough Council to a maximum of 100 days.
- 2.18. Arlingclose continued to monitor and assess credit default swap levels for signs of ongoing credit stress and although no changes were made to recommended durations over the period.
- 2.19. Heightened market volatility is expected to remain a feature, at least in the near term and, as ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remains under constant review.

### **3. Local Context**

- 3.1. On 31<sup>st</sup> March 2023, the Authority had net borrowing of £277.4m arising from its revenue and capital income and expenditure. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while balance sheet resources are the underlying resources available for investment. These factors are summarised in Table 1 below.

Table 1: Balance Sheet Summary

|                                    | Actual         | Estimate       |
|------------------------------------|----------------|----------------|
|                                    | 31 Mar 23      | 30 Sep 23      |
|                                    | £000           | £000           |
| General Fund CFR                   | 542,026        | 542,026        |
| Housing Revenue Account CFR        | 119,859        | 119,859        |
| <b>Total CFR</b>                   | <b>661,885</b> | <b>661,885</b> |
| Less other debt liabilities        | 109,043        | 109,043        |
| External borrowing                 | 463,572        | 443,053        |
| <b>Net borrowing/(investments)</b> | <b>135,923</b> | <b>133,532</b> |

- 3.2. The treasury management position at 30<sup>th</sup> September and the change over the six months' is shown in Table 2 below.

Table 2: Treasury Management Summary

|                                    | 31 Mar 23        | Movement        | 30 Sep 23        | 30 Sep 23    |
|------------------------------------|------------------|-----------------|------------------|--------------|
|                                    | Balance          |                 | Balance          | Rate         |
|                                    | £000             |                 | £000             | %            |
| Long-term borrowing                | 448,372          | (5,319)         | 443,053          | 3.12%        |
| Short-term borrowing               | 15,200           | (15,000)        | 200              | 0%           |
| <b>Total borrowing</b>             | <b>463,572</b>   | <b>(20,319)</b> | <b>443,253</b>   | <b>3.12%</b> |
| Long-term investments              | (26,518)         | 0               | (26,518)         | 3.17%        |
| Short-term investments             | (156,857)        | (4,500)         | (161,357)        | 5.35%        |
| Cash and cash equivalents          | (2,818)          | (1,470)         | (4,288)          | 5.32%        |
| <b>Total Investments</b>           | <b>(186,193)</b> | <b>(5,970)</b>  | <b>(192,163)</b> | <b>5.05%</b> |
| <b>Net borrowing/(investments)</b> | <b>277,378</b>   | <b>(26,289)</b> | <b>251,089</b>   |              |



- 3.3. The movement in borrowing balances between 31<sup>st</sup> March 2023 and 30<sup>th</sup> September 2023 can be explained by the planned maturity of short term and long term loans.

#### **4. Borrowing**

- 4.1. CIPFA's 2021 Prudential Code is clear that local authorities must not borrow to invest primarily for financial return and that it is not prudent for local authorities to make any investment or spending decision that will increase the capital financing requirement and so may lead to new borrowing, unless directly and primarily related to the functions of the Authority. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield unless these loans are for refinancing purposes.
- 4.2. The Authority currently holds £21.1m in commercial investments that were purchased prior to the change in the CIPFA Prudential Code. The Authority's commercial investment portfolio is currently performing in line with expectation. However, before undertaking further additional borrowing the Authority will review the options for exiting these investments.

#### **Borrowing strategy and activity**

- 4.3. As outlined in the treasury strategy, the Authority's chief objective when borrowing has been to strike an appropriately low risk balance between securing lower interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Authority's long-term plans change being a secondary objective. The Authority's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio.
- 4.4. There was a substantial rise in the cost of both short- and long-term borrowing over the last 18 months. Bank Rate rose by 1% from 4.25% at the beginning of April to 5.25% at the end of September. Bank Rate was 2% higher than at the end of September 2022.
- 4.5. UK gilt yields were volatile, mainly facing upward pressure since early April following signs that UK growth had been more resilient, inflation stickier than expected, and that the Bank of England saw persistently higher rates through 2023/24 as key to dampening domestic demand. Gilt yields, and consequently PWLB borrowing rates, rose and broadly remained at elevated levels. On 30<sup>th</sup> September, the PWLB certainty rates for maturity loans were 5.26% for 10-year loans, 5.64% for 20-year loans and 5.43% for 50-year loans. Their equivalents on 31<sup>st</sup> March 2023 were 4.33%, 4.70% and 4.41% respectively.
- 4.6. A new PWLB HRA rate which is 0.4% below the certainty rate was made available from 15<sup>th</sup> June 2023. Initially available for a period of one year, this discounted rate is to support local authorities borrowing for the Housing Revenue Account and for refinancing existing HRA loans.

4.7. At 30<sup>th</sup> September the Authority held £443.05m of loans, a decrease of £24.3m from 31<sup>st</sup> March 2023, as part of its strategy for funding previous years' capital programmes. Outstanding loans on 30<sup>th</sup> September are summarised in Table 3 below.

4.8. Table 3: Borrowing Position

|                         | 31 Mar 23<br>Balance | Net<br>Movement | 30 Sep 23<br>Balance | 30 Sep 23<br>Weighted<br>Average<br>Rate | 30 Sep 23<br>Weighted<br>Average<br>Maturity |
|-------------------------|----------------------|-----------------|----------------------|--|--|
|                         | £000                 | £000            | £000                 | %  | (Years)                                      |
| Public Works Loan Board | 396,372              | (4,319)         | 395,853              | 3.00%                                    | 28.37  |
| Banks (LOBO)            | 42,000               | (5,000)         | 37,000               | 4.25%                                    | 44.57  |
| Banks (fixed-term)      | 10,000               | 0               | 10,000               | 3.89%                                    | 42.72  |
| Local authorities       | 15,200               | (15,000)        | 200                  | 0  | 1.5  |
| <b>Total borrowing</b>  | <b>463,572</b>       | <b>(24,319)</b> | <b>443,053</b>       | <b>3.12%</b>                             | <b>30</b>                                    |

4.9. The Authority's is a normally a net lender but will borrow short-term to meet unplanned cashflow deficit. Therefore, the increase in short-term borrowing cost has had little impact on the Authority's finances. The Authority has a £200k (short-term) loan relating to one of its legacy authorities – this loan has yet to be repaid.

4.10. **Loans restructuring:** The Authority does not have a significant medium- to long-term borrowing requirement and will evaluate the opportunity cost of prepaying loans with cash resources. As was the case when the Authority repaid a LOBO (Lender's Option Borrower's Option) loan in August 2023.

4.11. **LOBO loans:** On 1<sup>st</sup> April 2023 the Authority held £42m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Authority has the option to either accept the new rate and terms or to repay the loan at no additional cost.

4.12. As market interest rates rose, there was increased probability of call options on the LOBOs being exercised by lenders. £5m of LOBO loans had annual/semi-annual call option dates during the six-month period to September 2023, lenders exercised their option on the following of the Authority's loan:

|             | Amount<br>£000 | Rate<br>% | Final<br>Maturity | New Rate<br>Proposed | Action taken by the Council           |
|-------------|----------------|-----------|-------------------|----------------------|---------------------------------------|
| Commerzbank | 5,000          | 4.32      | 05/09/2042        | 6.44                 | Repaid at no cost from cash resources |

- 4.13. The Authority has £27m LOBO loans with call dates within the next 12 months as follows:

|                    | Amount<br>£000 | Rate<br>% | Final<br>Maturity | Next<br>Option | Action to be taken by the Council          |
|--------------------|----------------|-----------|-------------------|----------------|--|
| FMS Wertmanagement | 10,000         | 4.50      | 27-Apr-55         | 27-Oct-23      | Repay from cash resources or new borrowing |
| KBC Bank           | 17,000         | 4.45      | 28-Mar-77         | 28-Mar-24      | Repay from cash resources or new borrowing |

- 4.14. The Authority has liaised with treasury management advisors Arlingclose over the likelihood of the options being exercised. If the option is exercised and an increased rate proposed, the Authority plans to repay the loan at no additional cost as accepting the revised terms would mean the Authority would still have refinancing risk in later years. If required, the Authority will repay the LOBO loans with available cash or by borrowing from other local authorities or the PWLB.

## 5. Treasury Investment Activity

- 5.1. The CIPFA Treasury Management Code now defines treasury management investments as those investments which arise from the Authority's cash flows or treasury risk management activity that ultimately represents balances that need to be invested until the cash is required for use in the course of business.

- 5.2. The Authority holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. During the half year, the Authority's investment balances ranged between £180.56m and £251.53m due to timing differences between income and expenditure. The investment position is shown in table 4 below.

- 5.3. Table 4: Treasury Investment Position

|  | 31 Mar 23<br>Balance<br>£000 | Net<br>Movement<br>£000 | 30 Sep 23<br>Balance<br>£000 | 30 Sep 23<br>Weighted<br>Average<br>Rate<br>% | 30 Sep 23<br>Weighted<br>Average<br>Maturity<br>(Years) |
|--|------------------------------|-------------------------|------------------------------|---|---|
| Bank & Building Societies (unsecured)    | 11,357                       | 0                       | 11,357                       | 5.44%   | 46  |
| Government (including local authorities) | 145,500                      | 4,500                   | 150,000                      | 5.38%   | 186   |
| Money Market Funds                       | 2,818                        | 1,470                   | 4,288                        | 5.32%   | 0   |
| Real Estate Investment Trusts            | 26,518                       | (609)                   | 25,909                       | 3.17%   | 5   |
| <b>Total investments</b>                 | <b>186,193</b>               | <b>5,361</b>            | <b>191,554</b>               | <b>5.09%</b>                                  | <b>149</b>  |

- 5.4. Both the CIPFA Code and government guidance require the Authority to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Authority's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

- 5.5. Rate increased by 1%, from 4.25% at the beginning of April to 5.25% by the end of September. Short-dated cash rates rose commensurately, with 3-month rates rising to around 5.25% and 12-month rates to nearly 6%. The rates on DMADF deposits also rose, ranging between 4.8% and 5.4% by the end of June and Money Market Rates between 4.6% and 4.9%.
- 5.6. £25.9m that is available for longer-term investment invested in pooled property funds. One of the property funds that the Council is invested in has giving notice of its intention to terminate by the 31<sup>st</sup> December 2023 unless it is able to merge with another fund.
- 5.7. If the fund was to terminate, the fund manager would commence liquidating all fund assets and return proceeds from each asset sold to unitholders in proportion to their holding in the Fund. The fund has recently either achieved or exceeded book valuation when assets have been disposed, therefore it is hoped that any losses, if there are any, will be minimal.
- 5.8. The progression of risk and return metrics are shown in the extracts from Arlingclose’s quarterly investment benchmarking in Table 5 below.

Table 5: Investment Benchmarking

|                           | Credit Score | Credit Rating | Bail-in Exposure | Weighted Average Maturity (days) | Rate of Return % |
|---------------------------|--------------|---------------|------------------|----------------------------------|------------------|
| 31-Mar-23                 | 5.13         | A+            | 15%              | 97                               | 3.78             |
| 30-Sep-23                 | 4.85         | A+            | 9%               | 172                              | 5.00             |
| Similar Local Authorities | 4.57         | A+            | 65%              | 42                               | 4.71             |
| All Local Authorities     | 4.47         | AA-           | 59%              | 13                               | 4.79             |

- 5.9. **Externally Managed Pooled Funds:** £25.9m of the Authority’s investments is invested in externally managed strategic pooled property funds where short-term security and liquidity are lesser considerations, and the objectives instead are regular revenue income and long-term price stability.
- 5.10. Investor sentiment for UK commercial property was more settled than in Q3 and Q4 of 2022 when the sharp rise in bond yields resulted in a big fall in property valuations. There were signs of returning investor interest, occupier resilience and a perception that the downturn in commercial real estate may be bottoming out. It helped rental income and led to some stabilisation in capital values. However, the combination of high interest rates and bond yield, higher funding costs and the prospect of sluggish economic growth constrain the outlook for commercial property.
- 5.11. The change in the Authority’s funds’ capital values and income return over the 6-month period is shown in Table 4.

- 5.12. Income returns as at 30<sup>th</sup> September is significantly above budget at 1.50%. The Authority has budgeted £0.487m income from these investments in 2023/24. The forecast income earned up to 30<sup>th</sup> September is £0.465m. During budget setting, it was anticipated that there would be significant cooling in the property market given the fiscal policy of central banks to push up interest rates. Whilst there has been some reduction in pricing, this has not affected yield in the manner that was anticipated.
- 5.13. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Authority's medium- to long-term investment objectives are regularly reviewed. Strategic fund investments are made in the knowledge that capital values will move both up and down on months, quarters and even years; but with the confidence that over a three- to five-year minimum period total returns will exceed cash interest rates.
- 5.14. **Statutory override:** In April 2023 the Department for Levelling Up, Housing and Communities published the full outcome of the consultation on the extension of the statutory override on accounting for gains and losses on pooled investment funds. The override has been extended for two years until 31st March 2025 but no other changes have been made; whether the override will be extended beyond the new date is unknown but commentary to the consultation outcome suggests not. The Authority will discuss with Arlingclose the implications for the investment strategy and what action may need to be taken.

## 6. Non-Treasury Investments

- 6.1. The definition of investments in the Treasury Management Code now covers all the financial assets of the Authority as well as other non-financial assets which the Authority holds primarily for financial return. Investments that do not meet the definition of treasury management investments (i.e. management of surplus cash) are categorised as either for service purposes (made explicitly to further service objectives) and or for commercial purposes (made primarily for financial return).
- 6.2. Investment Guidance issued by the Department for Levelling Up Housing and Communities (DLUHC) and Welsh Government also includes within the definition of investments all such assets held partially or wholly for financial return.
- 6.3. The Authority also held £21.55m of such investments in:
- directly owned property £21.1m
  - shareholding in subsidiaries £0.45m

- 6.4. The above investments in property are long term in nature and primarily to allow the Council to generate positive rental income net of costs on an annual basis to support the delivery of local services – they are not for capital purposes. Therefore, the Council does not plan to crystallise the above accounting gains/losses.
- 6.5. Northamptonshire County Council (NCC) made a loan of £1.8m to LGSS (now Pathfinder Legal Services Limited – (PLSL)) which was a subsidiary of the County Council set up in partnership with and jointly owned with Cambridgeshire County Council, Central Bedfordshire Council. The loan was made to provide working capital to PLSL when it was set up. On vesting day for NNC, half (£0.9m) of the loan provided by NCC was transferred to the Council and the other half to West Northamptonshire Council.
- 6.6. These investments generated £0.65m of investment income for the Authority after taking account of direct costs, representing a rate of return of 3.02%.

## 7. **Compliance**

- 7.1. The Council's Section 151 Officer reports that all treasury management activities undertaken during the quarter complied fully with the principles in the Treasury Management Code and the Authority's approved Treasury Management Strategy. Compliance with specific investment limits is demonstrated in table 7 below.

Table 7: Investment Limits

|   | <b>2023/24<br/>Maximum<br/>£000</b> | <b>30.9.23<br/>Actual<br/>£000</b> | <b>Complied?<br/>Yes/No</b> |
|---|-------------------------------------|------------------------------------|-----------------------------|
| Any single organisation, except the UK Government       | 20,000                              | 20,000                             | Yes                         |
| Any group of organisations under the same ownership     | 20,000                              | 20,000                             | Yes                         |
| Any group of pooled funds under the same management     | 20,000                              | 0                                  | Yes                         |
| Limit per non-UK country                                | 20,000                              | 0                                  | Yes                         |
| Registered providers and registered social landlords    | 10,000                              | 0                                  | Yes                         |
| Unsecured investments with banks and building societies | 20,000                              | 6,000                              | Yes                         |
| Money Market Funds (Per Fund)                           | 20,000                              | 20,000                             | Yes                         |
| Real Estate Investment Trusts                           | 20,000                              | 12,000                             | Yes                         |

- 7.2. Compliance with the Authorised Limit and Operational Boundary for external debt is demonstrated in table 8 below.

Table 8: Debt and the Authorised Limit and Operational Boundary

|                      | TMSS<br>Boundary /<br>Limit<br>£000 | Total Debt<br>£000 | Headroom<br>£000 | Complied<br>Yes / No |
|----------------------|-------------------------------------|--------------------|------------------|----------------------|
| Operational Boundary | 721,310                             | 443,053            | 278,257          | Yes                  |
| Authorised Limit     | 793,540                             | 443,053            | 350,487          | Yes                  |

- 7.3. Since the operational boundary is a management tool for in-year monitoring it is not significant if the operational boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

## 8. Treasury Management Prudential Indicators

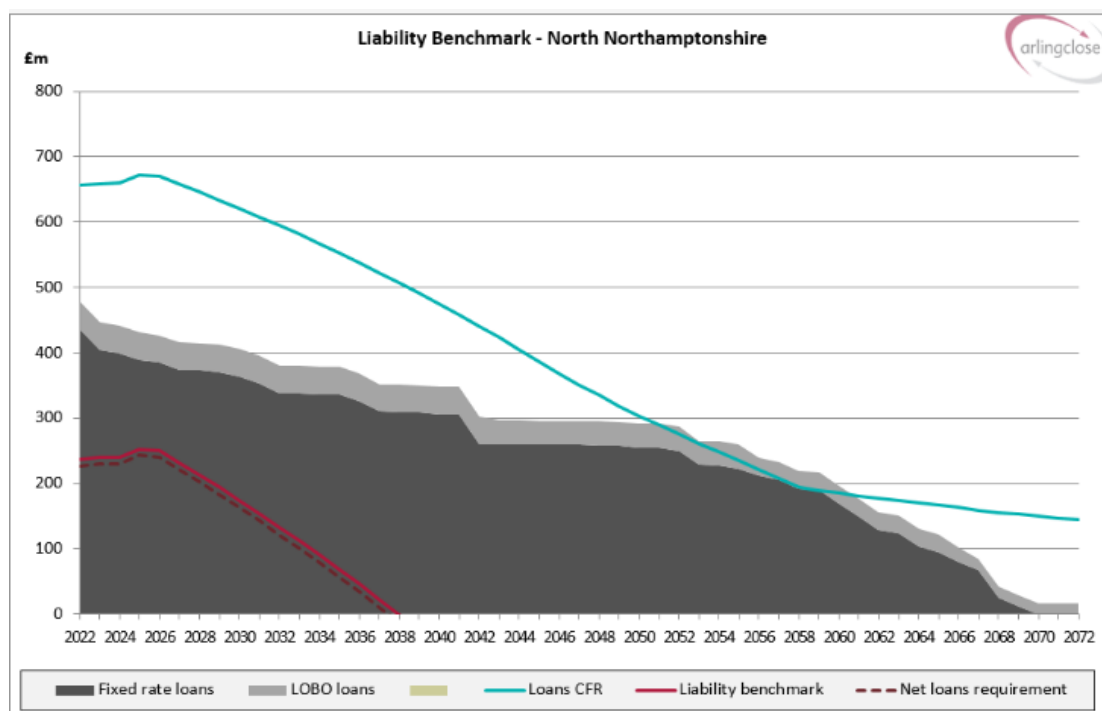
- 8.1. As required by the 2021 CIPFA Treasury Management Code, the Authority monitors and measures the following treasury management prudential indicators.

### Liability Benchmark:

- 8.2. This new indicator compares the Authority's actual existing borrowing against a liability benchmark that has been calculated to show the lowest risk level of borrowing. The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. It represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level of £10m required to manage day-to-day cash flow.

|                               | 31.3.23<br>Actual<br>£m | 31.3.24<br>Forecast<br>£m | 31.3.25<br>Forecast<br>£m | 31.3.26<br>Forecast<br>£m |
|-------------------------------|-------------------------|---------------------------|---------------------------|---------------------------|
| Loans CFR                     | 658.885                 | 659.602                   | 672.183                   | 669.372                   |
| Less: Balance sheet resources | -429.469                | -429.469                  | -429.469                  | -429.469                  |
| <b>Net loans requirement</b>  | <b>229.416</b>          | <b>230.133</b>            | <b>242.714</b>            | <b>239.903</b>            |
| Plus: Liquidity allowance     | 10.000                  | 10.000                    | 10.000                    | 10.000                    |
| <b>Liability benchmark</b>    | <b>239.416</b>          | <b>240.133</b>            | <b>252.714</b>            | <b>249.903</b>            |
| <b>Existing Borrowing</b>     | <b>463.572</b>          | <b>438.083</b>            | <b>428.242</b>            | <b>423.49</b>             |

8.3. Following on from the medium-term forecast above, the long-term liability benchmark assumes some capital expenditure funded by borrowing annually, minimum revenue provision on new capital expenditure based on a 25 year asset life and income, expenditure and reserves all increasing by inflation of 2.0% per annum. This is shown in the chart below together with the maturity profile of the Authority's existing borrowing.



8.4. Whilst borrowing may be above the liability benchmark, strategies involving borrowing which is significantly above the liability benchmark carry higher risk.

8.5. Maturity Structure of Borrowing: This indicator is set to control the Authority's exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

|                              | Upper Limit | Lower Limit | 30.9.23 Actual | Complied ? |
|------------------------------|-------------|-------------|----------------|------------|
| Under 12 months              | 30%         | 0%          | 8.51%          | Yes        |
| 12 months and within 2 Years | 30%         | 0%          | 1.02%          | Yes        |
| 2 Years and within 5 Years   | 30%         | 0%          | 6.38%          | Yes        |
| 5 years and within 10 years  | 35%         | 0%          | 7.82%          | Yes        |
| 10 years and within 20 years | 40%         | 0%          | 17.64%         | Yes        |
| 20 years and within 30 years | 40%         | 0%          | 7.16%          | Yes        |
| 30 years and within 40 years | 45%         | 0%          | 30.41%         | Yes        |
| 40 years and within 50 years | 50%         | 0%          | 21.07%         | Yes        |
| Over 50 years                | 20%         | 0%          | 0.00%          | Yes        |



- 8.6. Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.
- 8.7. Liquidity: The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount it can borrow each period without giving prior notice.

|  | <b>30.9.23<br/>Actual</b> | <b>2023/24<br/>Target</b> | <b>Complied?</b> |
|--|---------------------------|---------------------------|------------------|
| Total sum borrowed in past 3 months without prior notice | 0                         | £25m                      | Yes              |

## Prudential Indicators Mid Year 2023/24

### 9. Prudential Indicators

- 9.1. The Authority measures and manages its capital expenditure, borrowing and commercial and service investments with references to the following indicators.
- 9.2. It is now a requirement of the CIPFA Prudential Code that these are reported on a quarterly basis.
- 9.3. **Capital Expenditure:** The Authority has undertaken and is planning capital expenditure as summarised below:

|                       | 2022/23<br>actual<br>£000 | 2023/24<br>forecast<br>£000 | 2024/25<br>budget<br>£000 | 2025/26<br>budget<br>£000 |
|-----------------------|---------------------------|-----------------------------|---------------------------|---------------------------|
| General Fund services | 35,430                    | 64,116                      | 18,955                    | 7,674                     |
| Council housing (HRA) | 9,564                     | 7,429                       | 15,220                    | 13,950                    |

- 9.4. **Capital Financing Requirement:** The Authority's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP / loans fund repayments and capital receipts used to replace debt.

|                       | 31-Mar-23<br>actual<br>£000 | 31-Mar-24<br>forecast<br>£000 | 31-Mar-25<br>budget<br>£000 | 31-Mar-26<br>budget<br>£000 |
|-----------------------|-----------------------------|-------------------------------|-----------------------------|-----------------------------|
| General Fund services | 542,026                     | 542,352                       | 554,445                     | 551,885                     |
| Council housing (HRA) | 116,859                     | 117,250                       | 117,739                     | 117,487                     |
| <b>TOTAL CFR</b>      | <b>658,885</b>              | <b>659,602</b>                | <b>672,184</b>              | <b>669,372</b>              |

- 9.5. **Gross Debt and the Capital Financing Requirement:** Statutory guidance is that debt should remain below the capital financing requirement, except in the short term. The Authority has complied and expects to continue to comply with this requirement in the medium term as is shown below.

|                               | 31-Mar-23<br>actual<br>£000 | 31-Mar-24<br>forecast<br>£000 | 31-Mar-25<br>budget<br>£000 | 31-Mar-26<br>budget<br>£000 | Debt at<br>30-Sep-23<br>£000 |
|-------------------------------|-----------------------------|-------------------------------|-----------------------------|-----------------------------|------------------------------|
| Debt (General Fund)           | 463,572                     | 438,083                       | 428,242                     | 423,490                     | 443,053                      |
| Capital Financing Requirement | 658,885                     | 659,602                       | 672,184                     | 669,372                     |                              |

- 9.6. **Debt and the Authorised Limit and Operational Boundary:** The Authority is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year. In line with statutory guidance,

a lower “operational boundary” is also set as a warning level should debt approach the limit.

|           | Maximum debt H1 2023/24<br>£000 | Debt at 30-Sep-23<br>£000 | 2023/24 Authorised Limit<br>£000 | 2023/24 Operational Boundary<br>£000 | Complied?<br>Yes/No |
|-----------|---------------------------------|---------------------------|----------------------------------|--------------------------------------|---------------------|
| Borrowing | 463,572                         | 443,053                   | 793,540                          | 721,310                              | Yes/No              |

9.7. Since the operational boundary is a management tool for in-year monitoring it is not significant if the boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

9.8. **Net Income from Commercial and Service Investments to Net Revenue Stream**: The Authority’s income from commercial and service investments as a proportion of its net revenue stream has been and is expected to be as indicated below.

|  | 2022/23 actual<br>£000 | 2023/24 forecast<br>£000 | 2024/25 budget<br>£000 | 2025/26 budget<br>£000 |
|--|------------------------|--------------------------|------------------------|------------------------|
| Total net income from service and commercial investments | 636                    | 650                      | 663                    | 676                    |
| Proportion of net revenue stream                         | 0.21%                  | 0.19%                    | 0.19%                  | 0.20%                  |

9.9. **Proportion of Financing Costs to Net Revenue Stream**: Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP / loans fund repayments are charged to revenue.

9.10. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

|                                  | 2022/23 actual<br>£000 | 2023/24 forecast<br>£000 | 2024/25 budget<br>£000 | 2025/26 budget<br>£000 |
|----------------------------------|------------------------|--------------------------|------------------------|------------------------|
| Financing costs (£m)             | 10,781                 | 10,663                   | 10,535                 | 10,429                 |
| Proportion of net revenue stream | 3.64%                  | 3.16%                    | 3.08%                  | 3.11%                  |

9.11. **Treasury Management Indicators**: These indicators (Liability Benchmark, Maturity Structure of Borrowing, Long-Term Treasury Management Investments) are within the Treasury Management Mid-Year Report 2023/24.

This page is intentionally left blank

## EXECUTIVE 16<sup>th</sup> November 2023

|                      |   |
|----------------------|---|
| <b>Report Title</b>  | <b>Capital Programme Update 2023/24</b>   |
| <b>Report Author</b> | Janice Gotts, Executive Director of Finance and Performance<br><a href="mailto:Janice.gotts@northnorthants.gov.uk">Janice.gotts@northnorthants.gov.uk</a> |
| <b>Lead Member</b>   | Councillor Lloyd Bunday, Executive Member for Finance and Transformation  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>              | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number for exemption from publication under Schedule 12A Local Government Act 1974</b> |   |

### List of Appendices

None

### **1. Purpose of Report**

---

- 1.1 The purpose of this report is to request approval for capital schemes that have come forward for inclusion in within the Council's approved Capital Programme. Approval of the schemes and associated funding will allow these schemes to move forward to procurement and delivery.

### **2. Executive Summary**

---

- 2.1 This report contains details of projects which have been submitted by officers to the Council's Strategic Capital Board as part of the Council's Capital Approval Process. Each scheme must complete a business case setting out the changes requested to the Capital Programme, including the purpose of the spend, the expected outcomes and the financial implications together with funding routes.

### **3. Recommendations**

---

3.1 It is recommended that the Executive:

i) Approve the following changes into the capital programme:

- a. Smart Equipment for Long Covid (SELC) - budget approval for £158k, in 2023/24 which is to be funded from the Contain Outbreak Management Fund (COMF) grant.
- b. Kettering Library Roof replacement and associated work to the roof of the Art Gallery – budget approval for £6.807m in 2023/24 which is to be funded from borrowing.

ii) Recommend to Council to approve borrowing for the costs associated with the restoration and preservation work required for the Kettering Library Roof and associated work relating to the roof of the Art Gallery. This is in accordance with the Council's Constitution to approve all borrowing requests.

3.2 Reasons for Recommendations: These are set out in greater detail within section 5 of the report, but can be summarised as:

- To meet corporate plan objectives, specifically “active, fulfilled lives”.
- To enable the Council to continue to deliver its library functions within Kettering town centre.

3.3 Alternative Options Considered:

- Schemes in this report which are grant funded are in accordance with the requirements of the grant conditions so there is no alternative option proposed in this report.
- Where individual schemes are over £0.5m, separate reports are included elsewhere on this agenda which set out the wider options that were considered before reaching the proposals put forward.

### **4. Report Background**

---

4.1 The Capital Programme is the Council's plan for investing in assets to efficiently deliver its statutory services, and to improve the local infrastructure of North Northamptonshire, with the benefits lasting over a number of years. The Council is required to set a balanced revenue budget and therefore must ensure that where borrowing is proposed to fund the cost of capital that the cost of servicing the debt is affordable within the Council's revenue budget.

4.2 Resources come from several sources including Government grants, capital receipts from surplus land and buildings, revenue contributions, other external contributions and borrowing. The Council captures its projected capital

expenditure within the Capital Programme to monitor the same, help to control costs and ensure transparency. Given that the Capital Programme is approved by Executive, changes to it are also approved by Executive unless authority has been delegated in accordance with the Council's constitution.

- 4.3 This report provides an update to the Capital Programme 2023/24 as adopted by the Council in February 2023 and requests that the proposed changes are approved and reflected within the programme.

## **5. Issues and Choices – Further Detail on the Recommendations and Updates to the Capital Programme**

---

- 5.1 **Smart Equipment for Long Covid (SELC) - budget approval for £158k, in 2023/24 which is to be funded from the Contain Outbreak Management Fund (COMF) grant** – This scheme is for the installation of SMART fitness equipment at Lodge Park Sports Centre that will specifically target Long Covid sufferers and support Long Covid recovery. The project will allow North Northamptonshire health and fitness teams to test and improve the health outcomes for patients affected by Long Covid. It will enable public health partners to target communities and businesses improving the health conditions associated with Long Covid and build up community resilience for any future Covid-19 outbreaks or pandemics.

- 5.2 **Kettering Library Roof replacement and associated works – budget approval for £6.807m in 2023/24 which is to be funded from borrowing.** The library and attached Art Gallery are Grade II listed buildings. The roof is in parts over 120 years old and is made of Collyweston stone slate.

- 5.3 During the winter of 2022/23 the roof deteriorated rapidly, causing water ingress into the main library building and into some parts of the new Cornerstone extension, where the old roof meets the new. A condition survey of the roof has been obtained through heritage architects, which provides evidence that the roof should be replaced. This will be carried out using Collyweston stone slate on a like for like basis and given the nature of how it is constructed, it is recommended that this is undertaken during dry conditions. This requires the whole building to be made watertight through a tent canopy, which in turn necessitates a complex scaffold being erected and retained in place throughout the duration of the roof replacement.

- 5.4 As this scheme is over £0.5m, there is a separate report elsewhere on this agenda which sets out further information on the proposal.

## **6. Next Steps**

---

- 6.1 If approved, progress on the scheme will be monitored by a project board.

## **7. Implications (including financial implications)**

---

### **7.1 Resources, Finance and Transformation**

7.1.1 The additional budget requirement in this report is funded from the use of an external grant and borrowing. The funding source is set out in the recommendations in section 3 and within the scheme details as set out within section 5.

### **7.2 Legal**

7.2.1 The Council must utilise funding and deliver schemes in line with the restrictions and requirements as set out in the agreements linked to that funding and the requirements as set out in the Council's Constitution, in particular the budget setting and policy framework and the financial regulations. In this regard any new borrowing must be approved by Council (no new borrowing identified in this report).

### **7.3 Risk**

7.3.1 The deliverability of the 2023/24 Capital Programme is monitored by each accountable project manager and senior officer. There is further review throughout the financial year reported through the Executive.

7.3.2 If any overspends or emerging pressures are identified during the year, then mitigating actions will be sought and management interventions undertaken.

7.3.3 With most capital projects there is a risk that delays, and cost increases may arise as a result of the impact of inflation. Generally, this relates to the supply and price of materials with projects requiring increased lead in times. Whilst every attempt is made to cost these implications into the project, the risks remain. However, it must be recognised that the current "Cost of Living Crisis" has driven up the level of inflation, which is much higher than in previous periods and indeed when funding bids were originally submitted. This therefore poses a risk to the deliverability of the projects as originally envisaged, where reductions to the scope of projects may be required to ensure budgets are not overspent.

7.3.4 There is a risk in relation to funding, particularly where it is from third parties including grants. Appropriate agreements must be entered into to ensure that the funding is secured and spend is in accordance with any criteria stipulated by the funder, this includes both the nature of the spend and the timing (where a deadline applies).

7.3.5 The current uncertain economic context is also increasing interest rates associated with borrowing that is used to fund elements of the capital programme. This treasury risk impacts the overall affordability of the



programme, which will be closely monitored and managed, but may lead to a reduced capital programme in the future.

#### **7.4 Relevant Policies and Plans**

7.4.1 The scheme provides a strategic fit with the Council's priorities as set out within the Corporate Plan.

#### **7.5 Consultation**

7.5.1 The 2023/24 Capital Strategy and Capital Programme were subject to consultation prior to approval by the North Northamptonshire Authority in February 2023. The programme was approved by Council at its meeting on 23<sup>rd</sup> February 2023 and was subject to consultation from 22<sup>nd</sup> December 2022 to 27<sup>th</sup> January 2023. These changes are in addition to the approved programme.

#### **7.6 Consideration by the Executive Advisory Panel**

7.6.1 Not applicable.

#### **7.7 Consideration by Scrutiny**

7.7.1 The schemes recommended in this report have not been considered by Scrutiny. However, monitoring against the programme is subject to Scrutiny.

#### **7.8 Equality Implications**

7.8.1 Nothing specific within this report.

#### **7.9 Climate and Environmental Impact**

7.9.1 The climate and environmental impact of each capital project will be considered and managed within the relevant scheme.

#### **7.10 Community Impact**

7.10.1 These proposals can be considered to have a positive impact on the community as the Capital Programme delivers a range of schemes to support and connect communities.

## 7.11 **Crime and Disorder Impact**

7.11.1 Nothing specific within this report.

## **8. Background Papers**

---

8.1 The following background papers can be considered in relation to this report.

Capital Programme Budget 2023/24 – Full Council, 23<sup>rd</sup> February 2023 - [Capital Programme Report 2023-26 - Feb Council.pdf \(moderngov.co.uk\)](#)

## EXECUTIVE 16<sup>th</sup> November 2023

|                       |   |
|-----------------------|---|
| <b>Report Title</b>   | <b>Budget Forecast 2023-24 at Period 6</b>  |
| <b>Report Authors</b> | Janice Gotts, Executive Director of Finance and Performance<br><a href="mailto:Janice.gotts@northnorthants.gov.uk">Janice.gotts@northnorthants.gov.uk</a> |
| <b>Lead Member</b>    | Councillor Lloyd Bunday, Executive Member for Finance and Transformation  |

|  |   |
|--|---|
| <b>Key Decision</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Is the decision eligible for call-in by Scrutiny?</b>   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Are there public sector equality duty implications?</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>              | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>Applicable paragraph number for exemption from publication under Schedule 12A Local Government Act 1974</b> |   |

### List of Appendices

#### Appendix A – Savings Schedule

#### 1. Purpose of Report

---

- 1.1. The revenue budgets (2023/24) and Medium-Term Financial Plans for North Northamptonshire Council for the General Fund and the Housing Revenue Account were approved by Council at its meeting on 23<sup>rd</sup> February 2023. The purpose of this report is to set out the forecast outturn position for the Council for 2023/24 for the General Fund the Housing Revenue Account and the Dedicated Schools Grant.
- 1.2. This monitoring report sets out the material financial issues identified since the 2023/24 budget was set, based on the income and expenditure as at the end of September 2023 (Period 6) and reflects the views of the Assistant Directors and budget managers within the Directorates.
- 1.3. As part of the ongoing monitoring process, work will continue to examine income and expenditure and activity data, against the available budgets to support the position presented and help to shape the medium-term financial plan.

## 2. Executive Summary

---

- 2.1 This report provides commentary on the Council's forecast for the revenue outturn position 2023/24. This is an early indication based on information available as at Period 6 (September 2023) – the forecast position for each of the funds is as follows:
- General Fund - overspend of £7.575m - (Period 5 - £7.821m).
  - Housing Revenue Account – overspend of £52k – (Period 5 – £15k).
  - Dedicated Schools Grant is forecasting a pressure of £6.404m (Period 5- £4.995m).
- 2.2 The forecast is based on the emerging data for 2023/24 and the Council will continue to assess and refine the position on a regular basis using the latest intelligence available. The forecast presented in this report is based on the best available data and information of the operations of the Council and represents the view of the Budget Holders and Directors.
- 2.3 In order to help safeguard the financial position of the Council, officers will continue to seek efficiencies in year to offset the forecast overspend. The Council has a contingency budget and reserves available to call on to help fund in-year pressures, however, it will look to achieve alternative mitigations in the first instance before these are applied.
- 2.4 National factors continue to be challenging and the Council, like its residents and businesses are facing inflationary pressures which impacts on the cost of services with CPI in September 2023 at 6.7%. UK interest rates have been left unchanged at 5.25% after the Bank of England said price rises were slowing at a faster rate than expected. Interest rates were already at their highest for 15 years.

## 3. Recommendations

---

- 3.1 It is recommended that the Executive:
- a) Note the Council's forecast outturn position for 2023/24 as summarised in Section 4, alongside the further analysis, risks and other considerations as set out in Section 5 to Section 7 of the report.
  - b) Note the assessment of the current deliverability of the 2023/24 savings proposals in **Appendix A**.
- 3.2 Reason for Recommendations – to note the forecast financial position for 2023/24 as at Period 6 and consider the impact on this year and future years budgets.
- 3.3 Alternative Options Considered: The report focuses on the forecast revenue outturn against budget for 2023/24 and makes recommendations for the Executive to note the current budgetary position as such there are no specific choices within the report.

## 4. Report Background

### General Fund

- 4.1 The Council's Revenue Budget for 2023/24 was set at the Council meeting on 23<sup>rd</sup> February 2023. The overall outturn forecast for the General Fund for 2023/24, as at Period 5 is a forecast overspend of £7.575m (Period 5 - £7.821m) against a budget of £339.035m. This is summarised in the Table below.

| <b>General Fund Forecast Outturn 2023/24</b> |                   |                                   |                                   |                                   |
|--|-------------------|-----------------------------------|-----------------------------------|-----------------------------------|
| <b>Description</b>                           | <b>Net Budget</b> | <b>Forecast Position 31/03/24</b> | <b>Forecast Variance 31/03/24</b> | <b>Forecast Variance 31/03/24</b> |
|  | <b>£'000</b>      | <b>£'000</b>                      | <b>£'000</b>                      | <b>%</b>                          |
| <b>Net Available Resources</b>               | <b>339,034</b>    | <b>339,034</b>                    | <b>0</b>                          | <b>0.00</b>                       |
| <b>Total Corporate Budgets</b>               | <b>29,603</b>     | <b>24,447</b>                     | <b>(5,156)</b>                    | <b>(17.42)</b>                    |
| Children & Education                         | 69,711            | 80,831                            | 11,120                            | 15.95                             |
| Adults, Health, Partnerships and Housing     | 124,132           | 127,152                           | 3,020                             | 2.43                              |
| Public Health & Communities                  | 8,370             | 8,110                             | (260)                             | (3.11)                            |
| Place & Economy                              | 69,339            | 67,982                            | (1,357)                           | (1.96)                            |
| Enabling & Support Services                  | 37,879            | 38,087                            | 208                               | 0.55                              |
| <b>Total Directorate Budgets</b>             | <b>309,431</b>    | <b>322,162</b>                    | <b>12,731</b>                     | <b>4.11</b>                       |
| <b>Total Budget</b>                          | <b>339,034</b>    | <b>346,609</b>                    | <b>7,575</b>                      | <b>2.23</b>                       |

**Note – Favourable variances are shown in brackets.**

- 4.2 The forecast position at Period 6 is an overspend of £7.575m (Period 5 - £7.821m). The following table summarises the overspend.

|  | Report Ref | Net Budget     | P5 Forecast    | Movement in Forecast | P6 Forecast    |              |
|--|------------|----------------|----------------|----------------------|----------------|--------------|
|  |            | £000           | £000           | £000                 | £000           | %            |
| <b>Children &amp; Education</b>                      |            | <b>69,711</b>  | <b>10,618</b>  | <b>502</b>           | <b>11,120</b>  | <b>15.95</b> |
| Assistant Director of Education                      | 5.14       | 5,397          | 537            | 280                  | 817            | 15.14        |
| Commissioning & Partnerships                         | 5.16       | 1,034          | (115)          | 70                   | (45)           | (4.35)       |
| Northamptonshire Childrens Trust - NNC Only          | 5.19       | 63,280         | 10,196         | 152                  | 10,348         | 16.35        |
| <b>Adults, Health, Partnerships &amp; Housing</b>    |            | <b>124,132</b> | <b>3,020</b>   | <b>0</b>             | <b>3,020</b>   | <b>2.43</b>  |
| Adult Services                                       | 5.33       | 99,229         | 2,250          | 1,436                | 3,686          | 3.71         |
| Safeguarding and Wellbeing                           | 5.36       | 9,043          | 0              | 0                    | 0              | 0.00         |
| Commissioning & Performance                          | 5.38       | 13,368         | 770            | (1,436)              | (666)          | 0.00         |
| Strategic Housing, Development and Property Services | 5.40       | 2,492          | 0              | 0                    | 0              | 0.00         |
| <b>Public Health &amp; Communities</b>               |            | <b>8,370</b>   | <b>(260)</b>   | <b>0</b>             | <b>(260)</b>   | <b>0.00</b>  |
| Public Health  | 5.43       | 0              | 0              | 0                    | 0              | 0.00         |
| Communities & Leisure                                | 5.46       | 8,370          | (260)          | 0                    | (260)          | 0.00         |
| <b>Place &amp; Economy</b>                           |            | <b>69,339</b>  | <b>(1,124)</b> | <b>(233)</b>         | <b>(1,357)</b> | <b>0.00</b>  |
| Assets & Environment                                 | 5.49       | 4,150          | (845)          | (125)                | (970)          | 0.00         |
| Growth and Regeneration                              | 5.51       | 4,375          | 268            | 3                    | 271            | 6.19         |
| Highways & Waste                                     | 5.53       | 57,258         | (330)          | (57)                 | (387)          | 0.00         |
| Regulatory Services                                  | 5.55       | 2,911          | (217)          | (54)                 | (271)          | 0.00         |
| Directorate Management                               | 5.57       | 645            | 0              | 0                    | 0              | 0.00         |
| <b>Enabling &amp; Support Services</b>               |            | <b>37,879</b>  | <b>360</b>     | <b>(152)</b>         | <b>208</b>     | <b>0.55</b>  |
| Finance & Performance                                | 5.58       | 15,535         | 120            | (22)                 | 98             | 0.63         |
| Chief Executive's Office                             | 5.60       | 1,305          | 38             | (381)                | (343)          | 0.00         |
| Chief Information Officer                            | 5.62       | 10,309         | 268            | 30                   | 298            | 2.89         |
| Human Resources                                      | 5.64       | 3,726          | 31             | 0                    | 31             | 0.83         |
| Legal & Democratic Services                          | 5.66       | 4,999          | (81)           | 381                  | 300            | 6.00         |
| Customer Services                                    | 5.68       | 2,005          | (16)           | (160)                | (176)          | 0.00         |
| <b>Corporate Costs</b>                               | 5.2        | <b>29,603</b>  | <b>(4,793)</b> | <b>(363)</b>         | <b>(5,156)</b> | <b>0.00</b>  |
| <b>Total</b>   |            | <b>339,034</b> | <b>7,821</b>   | <b>(246)</b>         | <b>7,575</b>   | <b>2.23</b>  |

**Note – Favourable variances are shown in brackets.**

- 4.3 The net budget was increased by £482k from £336.590m in Period 2 to £337.072m in Period 3. This reflects the use of the Climate Change reserve to support the development and operation of climate change projects and initiatives which was approved by the Executive at the meeting on 12<sup>th</sup> July 2023.

4.4 The net budget was increased in Period 6 by £1.962m from £337.032m to £339.034m. This reflects the use of the Transformation Reserve to fund the Education Case Management System (£1,362m) and the Development and Regulatory Case Management System (£600k).

### Housing Revenue Account

4.5 The Housing Revenue Account (HRA) is a separate ring-fenced account within the Council for the income and expenditure associated with its housing stock. The HRA does not directly impact on the Council's wider General Fund budget or on the level of council tax. Income to the HRA is primarily received through the rents and other charges paid by tenants and leaseholders.

4.6 Within North Northamptonshire prior to 1<sup>st</sup> April 2021 there were two HRA accounts, covering the sovereign Councils of Kettering and Corby respectively. As part of the move to a single unitary council for North Northamptonshire, there was a statutory requirement to create a single HRA for the area. Whilst North Northamptonshire Council must only operate one HRA it will, for a period of time, operate two separate Neighbourhood Accounts, these being:

- the Corby Neighbourhood Account - responsible for the stock that was managed by Corby Borough Council and
- the Kettering Neighbourhood Account - responsible for the stock that was managed by Kettering Borough Council.

4.7 The Council's overall outturn forecast for the Housing Revenue Account as at Period 6, is a forecast overspend of £52k (Period 5 - £15k overspend) against the approved budget of £38.752m. This is summarised in the table below and further details are set out in Section 6. It is important to note that this is subject to continual review.

| Housing Revenue Account Forecast Outturn 2023/24 |                      |                 |              |   |
|--|----------------------|-----------------|--------------|---|
| Directorate                                      | Budget               |                 |              | P6 Forecast Variance at 31/03/24<br>£'000 |
|  | Expenditure<br>£'000 | Income<br>£'000 | Net<br>£'000 |   |
| Corby Neighbourhood Account                      | 21,481               | (21,481)        | 0            | 20  |
| Kettering Neighbourhood Account                  | 17,271               | (17,271)        | 0            | 32  |
| <b>Net Position 2022/23 (under)/over</b>         | <b>38,752</b>        | <b>(38,752)</b> | <b>0</b>     | <b>52</b>                                 |

### Dedicated Schools Grant

4.8 The Dedicated Schools Grant (DSG) is a ringfenced grant allocated to Local Authorities by the government to support a range of education related services.

- 4.9 The Council's overall outturn forecast for the DSG as at Period 6, is a forecast pressure of £6.404m (Period 5 - £4.995m) the Net Spend is forecast to be £127.067m against the approved budget of £120.663m. This is summarised in the table below and further details are set out in Section 7. It is important to note that this is subject to continual review.

| <b>Dedicated Schools Grants Forecast Outturn 2023/24</b> |                     |                                       |                       |                   |                   |                           |                 |
|--|---------------------|---------------------------------------|-----------------------|-------------------|-------------------|---------------------------|-----------------|
| <b>Block</b>   | <b>Gross Budget</b> | <b>July DSG Allocation Adjustment</b> | <b>Revised Budget</b> | <b>Recoupment</b> | <b>Net Budget</b> | <b>Forecast Net Spend</b> | <b>Variance</b> |
|  | <b>£'000</b>        | <b>£'000</b>                          | <b>£'000</b>          | <b>£'000</b>      | <b>£'000</b>      | <b>£'000</b>              | <b>£'000</b>    |
| Schools Block  | 270,284             | 0                                     | 270,284               | 222,910           | 47,374            | 47,374                    | 0               |
| Central Schools Block                                    | 3,287               | 0                                     | 3,287                 | 0                 | 3,287             | 3,287                     | 0               |
| High Needs Block   | 57,851              | 74                                    | 57,925                | 11,082            | 46,843            | 53,247                    | 6,404           |
| Early Year Block   | 23,541              | (382)                                 | 23,159                | 0                 | 23,159            | 23,159                    | 0               |
| <b>Total</b>   | <b>354,963</b>      | <b>(308)</b>                          | <b>354,655</b>        | <b>233,992</b>    | <b>120,663</b>    | <b>127,067</b>            | <b>6,404</b>    |

### **National Context**

- 4.10 The national, and indeed the global, economy continues to see significant inflationary pressures, with energy prices pushed to record levels, which in turn has contributed to high inflation. The Monetary Policy Committee (MPC) of the Bank of England has taken action to get inflation under control; this in part has resulted in higher interest rates.
- 4.11 The Bank of England kept the Base Rate unchanged at 5.25% on 2<sup>nd</sup> November 2023. There had previously been fourteen consecutive increases since December 2021 and the rate is at its highest level for 15 years (February 2008 – 5.25%).
- 4.12 The 12-month CPI figure for September 2023 is 6.7% which is unchanged to the CPI in August 2023. There has been a slight reduction in the 12-month RPI figure in September 2023 where the figure was 8.9% compared to 9.1% in August 2023.
- 4.13 Councils like most organisations have experienced the impact of significant price rises, particularly around fuel and energy costs (for example, the street lighting PFI). A number of services are provided under contract, and the Authority is experiencing some pressure from suppliers regarding current arrangements and any new contracts entered in to. As part of the budget setting for 2023/24, the Council included growth to address forecast inflationary increases in light of the position known at the time.
- 4.14 Further risk to Local Government funding comes from the high street as individuals have less disposable income and businesses face higher energy and supply costs. This poses a risk for the Council's future income generation from business rates should businesses cease to trade. It may also see more people seeking to access Council Tax Support and other financial support which could reduce the overall Council Tax yield. The continued increases in interest rates also have an impact on the number of new homes that are being occupied which can also have an adverse impact on the Council Tax yield.



- 4.15 Alongside this there is a recognition that the demand for services may increase which will need to be taken into account as part of financial and service planning.
- 4.16 The context of the national and global economy along with potential changes to the local government financial landscape in the future through reforms are key considerations for the Council as it continues to deliver its services for 2023/24 and will be key considerations in developing the 2024/25 draft budget proposals and the Medium-Term Financial Plan.

## 5. Overview of Forecast Position 2023/24

---

### Available Resources and Corporate Costs

- 5.1 The Council is responsible for the collection of local taxes (Council Tax and Business Rates). At the end of September 56.98% of Council Tax had been collected (September 2022 – 57.69%). Business Rates collection was 55.72% at the end of September 2023 (September 2022 – 56.80%).

### Corporate Resources

- 5.2 The total net budget for Corporate Resources is £29.603m. The composition of the budget together with the forecast variances are shown in the following Table.

| Description                     | Net Budget    | P6 Forecast Variance |                |
|---------------------------------|---------------|----------------------|----------------|
|                                 |               | £'000                | %              |
| Corporate Contingency           | 3,746         | 0                    | 0.00           |
| Minimum Revenue Provision (MRP) | 7,970         | 0                    | 0.00           |
| Pay Contingency                 | 5,708         | 0                    | 0.00           |
| Pay and Grading Review          | 2,479         | 0                    | 0.00           |
| Treasury                        | 8,830         | (5,156)              | (58.39)        |
| Bad Debts Provision             | 870           | 0                    | 0.00           |
|                                 |               |                      |                |
| <b>Total</b>                    | <b>29,603</b> | <b>(5,156)</b>       | <b>(17.42)</b> |

- 5.3 The Council's Corporate Contingency Budget for 2023/24 is £3.746m, which represents around 1% of the net budget. The contingency budget is held to meet unknown or unplanned / unbudgeted costs. At this stage the Contingency Budget is currently assumed to be used in full during the year. This will include inflationary and demand pressures as well as helping to offset the potential additional cost of the pay award, as the offer by the employers already exceeds the pay inflation allowed.
- 5.4 The Minimum Revenue Provision (MRP) reflects the minimum amount a Council must charge to the revenue budget each year to set aside a provision for repaying borrowing. This has been calculated as £7.970m which was an increase of £1.538m from 2022/23 and ensures that the provision is aligned to the MRP policy moving into the medium term.

- 5.5 The Council has set aside £5.708m in 2023-24 as a Pay Contingency to allow for annual increments and potential pay changes of 4%, with the final requirement determined by the outcome of pay negotiations, and the cost of increments. This budget will be allocated in 2023-24 once these have been agreed. The Pay award will exceed the budget as the offer by the employers already exceeds the pay inflation allowed. The forecast outturn will be updated following the conclusion of the national pay negotiations.
- 5.6 Additionally, a pressure of £2.479m was included in the 2023-24 budget, which reflected the initial costings for the implementation of the Pay and Grading review for staff recruited to interim contracts with North Northamptonshire Council, which is predominantly staff that have been appointed since 1<sup>st</sup> April 2021. Other staff transferred across to the new unitary authority on their existing terms and conditions through TUPE arrangements. The proposals for the new pay and grading structure are yet to be agreed. At this stage the forecast costs are expected to be delivered within budget.
- 5.7 The net Treasury Management Budget for 2023/24 is £8.830m. The composition of the budget and the forecast outturn is as follows:

| Description                     | Net Budget   | P6<br>Forecast<br>Variance |
|---------------------------------|--------------|----------------------------|
| £'000                           | £'000        | £'000                      |
| Investment Income               | (3,173)      | (5,810)                    |
| Borrowing Costs                 | 11,273       | 0                          |
| Other Treasury Management costs | 730          | 654                        |
| <b>Total</b>                    | <b>8,830</b> | <b>(5,156)</b>             |

- 5.8 The movement for investment income reflects the increase in the Bank of England base rate on future investments and is based on an average cash balance of £175.6m at a weighted average rate of 5.04% for a full year. This offsets the additional pressure of £654k; relating to increased bank charges of £232k, unrealised internal interest income of £267k and recovery of debt management expenses of £155k.
- 5.9 If interest rates remain high over the longer term this will also create risk in relation to acquiring new loans to finance future capital programmes. The current PWLB rate for borrowing over a 30-year period is around 6%, for every £1m borrowed this would be an additional interest payable of £60,000.
- 5.10 There continues to be risks around the overall cash and loan position for North Northamptonshire, not only from a volatile marketplace, but also due to the outstanding legacy audits for 2020/21 and the disaggregation of the opening position from Northamptonshire County Council. Any changes in these risks and balances will be reflected in future forecasts.
- 5.11 The bad debt provision for 2023/24 amounts to £870k – the bad debts position is based on the age of the debt which reflects the risks associated with the collection of the debt and is forecast to be delivered on budget.

## Directorate Budgets

- 5.12 This section of the report provides an analysis of the forecast variations against the 2023/24 General Fund for each of the Directorates as set out in the table at paragraph 4.2.

### Children's Services Directorate

- 5.13 The budget for Children's and Education Services includes the Commissioning and Partnerships including Northamptonshire Children's Trust and Education Services not funded by the Dedicated Schools Grant (DSG).

### **Assistant Director of Education**

- 5.14 The **Assistant Director of Education** is responsible for all learning, pupil attainment and achievement and school improvement functions. The forecast outturn position for the **Assistant Director of Education** is set out in the following table (Period 5 - £537k).

| <b>Assistant Director of Education</b> | <b>£'000</b> |
|--|--------------|
| Expenditure                            | 9,760        |
| Income                                 | (4,363)      |
| <b>Net Budget</b>                      | <b>5,397</b> |
| Forecast                               | 6,214        |
| <b>Variance</b>                        | <b>817</b>   |

- 5.15 The forecast variance relating to the **Assistant Director of Education** is set out in the following Table and explanations for the variances are provided in the table below.

| Ref | Description           | Budget       | Forecast Variance |              |
|-----|-----------------------|--------------|-------------------|--------------|
|     |                       |              | £'000             | %            |
|     |                       | £'000        | £'000             |              |
| 1   | Employees             | 8,176        | 1,200             | 14.68        |
| 2   | Supplies and Services | 1,259        | (196)             | (15.57)      |
| 3   | Income                | (4,363)      | (299)             | 6.85         |
| 4   | Other budgets         | 325          | 112               | 34.46        |
|     |                       |              |                   |              |
|     | <b>Total</b>          | <b>5,397</b> | <b>817</b>        | <b>15.14</b> |

- 1) The budget pressure within Education Services predominantly relates to staffing costs. The Education Health and Care (EHC) service is continuing to rely heavily on interim workers to fulfil its statutory obligations. This is due to increasing level of need, a high number of vacancies, and backlog of historic assessments. The service has planned to gradually phase out the existing agency staff from July 2023. This will require recruiting and taking the initiative to actively upskill the existing staff to ensure the future needs of children, young people and their families can be met. Whilst there are service areas with substantial amount of savings on salaries, particularly Educational Entitlement (£104k), Governance (£178k), Specialist Support (£345k), the

salary budget forecast pressure in EHC (£1.540m), and other service areas (£287k) results in a net pressure of £1.2m.

- 2) The forecast underspend for supplies and services of £196k relates to the reduced forecast spend on professional fees and hired services (£113k) and external legal fees (£53k) in Strategic Planning and Education Health Care service areas. In addition, there are other net minor savings of £30k. The Strategic Planning is one of the service areas contributing to the significant forecast overspend of £1.2m on salaries. As such, the forecast underspend of £113k will be used to partly mitigate the service's salary budget pressure.
- 3) Income has a forecast net benefit of £299k of which £338k relates to Teachers' Pension. The budget was set at £468k, while the forecast DSG contribution is £806k. Also, the School Improvement Monitoring and Brokering grant has now ceased, leaving the service with a pressure of £227k. Additionally, the EHC team is benefiting from the use of the residual Contain Outbreak Management Fund (COMF) of £220k. The funding will partly mitigate the staffing pressure associated with support to the most vulnerable Children and Young People. There are other net minor pressures of £32k across the services.
- 4) In respect of the other budget areas, there is a pressure of £111k. There has been an increase in the spend against Educational Psychologist Trainees and the service is anticipating an increased bursaries payment to the respective cohort, resulting in a pressure of £45k. There are other net pressures of £66k, of which £83k relates to internal contributions and recharges that are not practically chargeable since the disaggregation of the budget between the North and the West.

### **Assistant Director Commissioning and Partnerships**

5.16 The **Assistant Director of Commissioning and Partnerships** leads the commissioning functions for Children's Services across North Northamptonshire and the contract management of the Northamptonshire Children's Trust and the commissioning of education services. The Children's and Education Services remaining with the Council includes the Intelligent Client Function (ICF) for the Northamptonshire Children's Trust and the Local Authority statutory education functions as follows:

- Education Inclusion
- Education Psychology
- Support for children with Special Educational Needs and Disabilities (SEND)
- School Improvement
- Virtual Schools (lead in the North Northamptonshire Unitary Authority)
- School admissions and school place planning
- Early Education and Child Care

5.17 The forecast outturn position for the **Assistant Director of Commissioning and Partnerships** (excluding the Children's Trust) is set out in the following Table (Period 5 - £115k)

|   |              |
|---|--------------|
| <b>Assistant Director of Commissioning and Partnerships</b> | <b>£'000</b> |
| Expenditure   | 1,179        |
| Income  | (145)        |
| <b>Net Budget</b>   | <b>1,034</b> |
| Forecast  | 989          |
| <b>Variance</b>   | <b>(45)</b>  |

5.18 The forecast variance relating to the **Assistant Director Commissioning and Partnerships** (excluding the Children's Trust) is set out in following Table and explanations for the variances are provided below the Table.

| Ref | Description   | Budget       | Forecast Variance |               |
|-----|---------------|--------------|-------------------|---------------|
|     |               |              | £'000             | %             |
|     |               | £'000        | £'000             |               |
| 1   | Employees     | 1,142        | (71)              | (6.22)        |
| 3   | Income        | (145)        | 0                 | 0.00          |
| 4   | Other budgets | 37           | 26                | 70.27         |
|     |               |              |                   |               |
|     | <b>Total</b>  | <b>1,034</b> | <b>(45)</b>       | <b>(4.35)</b> |

- 1) The Commissioning and Partnerships is forecasting a net savings of £71k on staffing. The directorate is currently undertaking a staffing restructure which will include a realignment of budgets across Children's Services. Whilst the directorate is striving to spend within the approved budget provision, the outcome of the restructure will determine the subsequent forecast spend for the service.
- 2) The service is expecting to receive the budgeted income of £145k in full. The income predominantly relates to DSG funding allocation and partner contributions to Information Advice and Support Service (IASS) and Northamptonshire Safeguarding Children Partnership (NSCP) services.
- 3) The service will be responsible for external legal fees to support the contract management of Northamptonshire Children's Trust. This was not initially budgeted, therefore resulting in a pressure of £30k. There are other minor savings of £4k.

### **Northamptonshire Children's Trust**

5.19 The forecast outturn position for the **Northamptonshire Children's Trust** is set out in the following Table (Period 5 - £10.196m)

|  |               |
|--|---------------|
| <b>Northamptonshire Children's Trust</b> | <b>£'000</b>  |
| Expenditure                              | 67,645        |
| Income                                   | (4,365)       |
| <b>Net Budget</b>                        | <b>63,280</b> |
| Forecast                                 | 73,628        |
| <b>Variance</b>                          | <b>10,348</b> |

5.20 The forecast variance relating to the **Northamptonshire Children’s Trust** is set out in following Table and explanations for the variances are provided below the Table.

| Ref | Description          | Budget        | Forecast Variance |              |
|-----|----------------------|---------------|-------------------|--------------|
|     |                      |               | £'000             | %            |
|     |                      | £'000         | £'000             |              |
| 1   | Third Party Payments | 67,645        | 10,348            | 15.30        |
| 2   | Income               | (4,365)       | 0                 | 0.00         |
|     |                      |               |                   |              |
|     | <b>Total</b>         | <b>63,280</b> | <b>10,348</b>     | <b>16.35</b> |

5.21 The Northamptonshire Children’s Trust delivers children’s social care and targeted early help on behalf of North Northamptonshire Council and West Northamptonshire Council. The Councils set the strategic outcomes and priorities and the Trust is responsible for delivering those outcomes. Services provided by the Trust include:

- Targeted early help services to children and families.
- Front door and safeguarding services
- Support and placements for Children in Care
- Support and placements for Disabled Children
- In house fostering and residential provision
- Commissioning of external placements and contracts
- Commissioned legal services and transport for children in care.

5.22 The total contract value for the Childrens Trust is £150.938m. The Councils share of this is £66.654m this reflects how the contract sum is split between North Northamptonshire Council (44.16%) and West Northamptonshire Council (55.84%).

5.23 The Children’s Trust are forecasting an overspend of £23.434m – this is an increase of £345k to that previously reported to the Executive where the forecast pressure was £23.089m. The cost to the Council based on an overspend of £23.434m is £10.348m. If these pressures are not mitigated this will pose a significant financial risk to the Council. The Trust are looking at potential mitigations, however there is a risk that this position could worsen before year end. A key risk is the delivery of the efficiency savings of £7.632m which formed part of the contract sum. At present, the Trust is forecasting that £4.159m of these savings are at risk of non-delivery, this could increase the overall pressure from £23.434m to £27.593m. The following table summarises the contract sum and the forecast variances (excluding the risk on savings).

| Description                | Contract Sum   | Forecast Variance Period 5 | Movement   | Forecast Variance Period 6 |              |
|----------------------------|----------------|----------------------------|------------|----------------------------|--------------|
|                            | £'000          | £'000                      | £'000      | £'000                      | %            |
| Staffing                   | 49,732         | 2,292                      | 498        | 2,790                      | 5.61         |
| Other non staffing costs   | 358            | 0                          | 0          | 0                          | 0.00         |
| Placements                 | 65,376         | 20,199                     | 0          | 20,199                     | 30.90        |
| Contracts                  | 5,001          | 0                          | 0          | 0                          | 0.00         |
| Children's Homes           | 3,767          | 129                        | 0          | 129                        | 3.42         |
| Legal                      | 4,788          | 511                        | 0          | 511                        | 10.67        |
| Adoption                   | 7,776          | (133)                      | 0          | (133)                      | (1.71)       |
| Transport                  | 2,870          | 173                        | 0          | 173                        | 6.03         |
| Other care                 | 6,799          | (82)                       | 82         | 0                          | 0.00         |
| NCT Central - Other budget | (762)          | 0                          | (235)      | (235)                      | 30.84        |
| Support Services / SLA     | 5,233          | 0                          | 0          | 0                          | 0.00         |
| <b>Total</b>               | <b>150,938</b> | <b>23,089</b>              | <b>345</b> | <b>23,434</b>              | <b>15.53</b> |

5.24 The main pressure within the Children's Trust relates to placements for children in care – this amounts to £20.199m and is unchanged to that reported in Period 5, however there has been movement across the type of placement. The market and availability of placements remains challenging. The placements budget will continue to remain under pressure as it remains extremely volatile both locally and nationally. The Trust is working on how these pressures can be mitigated this year and how this can be reduced in future years. The following table provides further detail around the pressures from placements.

| Description             | Contract Sum  | Forecast Variance Period 5 | Movement | Forecast Variance Period 6 |              |
|-------------------------|---------------|----------------------------|----------|----------------------------|--------------|
|                         | £'000         | £'000                      | £'000    | £'000                      | %            |
| In House Fostering      | 8,532         | 67                         | 0        | 67                         | 0.79         |
| Agecny Fostering        | 16,895        | 1,781                      | (22)     | 1,759                      | 10.41        |
| Independent Residential | 31,087        | 7,434                      | (202)    | 7,232                      | 23.26        |
| Supported Accommodation | 3,400         | 10,424                     | (162)    | 10,262                     | 301.82       |
| 18+ Agency Placements   | 4,400         | 887                        | 465      | 1,352                      | 30.73        |
| Welfare Secure          | 339           | (212)                      | 0        | (212)                      | (62.54)      |
| UASC                    | 3,812         | 0                          | 0        | 0                          | 0.00         |
| Remand Secure           | 300           | 261                        | (76)     | 185                        | 61.67        |
| Income                  | (3,389)       | (443)                      | (3)      | (446)                      | 13.16        |
| <b>Total</b>            | <b>65,376</b> | <b>20,199</b>              | <b>0</b> | <b>20,199</b>              | <b>30.90</b> |

5.25 The contract sum included a pay provision of 4%, this was in line with the provision that both North and West Northamptonshire Council included in their budgets. NCT are not aligned to national pay negotiations and a proposed offer aligned to West Northamptonshire Council would require additional funding of

£1.007m a formal offer has been accepted by the Unions and this is reflected in the outturn. The forecast outturn also reflects a pressure of £1.087m for managed teams. A change control request to increase the contract sum by £2.094m has been made. In addition, there are further staff related pressures of £696k.

- 5.26 The legal services budget remains a challenge with increasing demand and additional inflationary costs in this area. The budget forecast is a projected overspend of £511k this is unchanged to Period 5.
- 5.27 There are also pressures on transport costs of £173k, this is unchanged from Period 5 and is as a result of inflationary pressures above the net contract sum of £2.870m. There is a risk that the inflation on transport costs could be above current levels. There are further minor savings which amount to £239k.
- 5.28 As part of the contract negotiations, it was agreed an amount of £2.243m was included for one off investments – the Council’s share of this was £991k – whilst this is subject to detailed Business Cases being provided from the Trust it is currently forecast that this will be delivered within budget.
- 5.29 The Children’s Trust Budget is monitored in year through regular meetings between officers of both North and West Northamptonshire Councils and the Trust.

### **Adults, Health Partnerships and Housing**

- 5.30 The revenue budget within this section covers Adult Social Services, Health Partnerships and Housing (excluding the HRA).
- 5.31 Under the 2014 Care Act, local authority Adults Services have a responsibility to make sure that people aged over 18 years who live in their areas are provided with personal day to day care (helping people get dressed, washed, going to the bathroom, eating etc) where they cannot do things for themselves or access family support. The service also provides other physical or psychological support to people with disabilities in order to help them live a full life. The overriding responsibility is to keep people safe and protect them from harm or neglect.
- 5.32 Care can take many forms and can be provided directly by the Council, through contracted organisations or families can receive a personal budget to buy suitable care for themselves. Although receiving formal or long-term care is subject to people meeting the Council’s eligibility criteria, the service also has a key responsibility for helping people to stay independent and preventing or delaying the need for care.

### **Assistant Director of Adult Services**

- 5.33 The **Assistant Director of Adult Services** is responsible for the strategic planning, engagement, operational and statutory delivery of Adult Social Care This includes the independent care budgets for all people aged over 18 and the social care and reablement teams. The forecast outturn position for the **Assistant Director of Adult Services** is set out in the following table (Period 5 £2.250m overspend)



| <b>Assistant Director of Adult Services</b> | <b>£'000</b>  |
|---|---------------|
| Expenditure                                 | 118,666       |
| Income                                      | (19,437)      |
| <b>Net Budget</b>                           | <b>99,229</b> |
| Forecast                                    | 102,915       |
| <b>Variance</b>                             | <b>3,686</b>  |

5.34 The forecast outturn relating to the **Assistant Director of Adult Services** is set out in the following table. The overspend assumes most savings detailed in **Appendix A** are achieved in year. However, £0.617m of the savings for the increase of the utilisation of Shaw PPP beds for Discharge to Assess is assumed to be at risk of delivery. These savings will continue to be tracked, and any further impact of the achievability will form part of future reports.

| Ref | Description          | Budget        | Forecast Variance |             |
|-----|----------------------|---------------|-------------------|-------------|
|     |                      |               | £'000             | %           |
|     |                      | £'000         | £'000             |             |
| 1   | Employees            | 8,527         | 0                 | 0.00        |
| 2   | Third Party payments | 95,277        | 3,986             | 4.18        |
| 3   | Transfer Payments    | 14,258        | 0                 | 0.00        |
| 4   | Income               | (19,437)      | (300)             | 1.54        |
| 5   | Other budgets        | 604           | 0                 | 0.00        |
|     | <b>Total</b>         | <b>99,229</b> | <b>3,686</b>      | <b>3.71</b> |

- 1) The employee related costs are currently forecast to be delivered on budget.
- 2) The main areas of spend in relation to Third Party Payments are in respect of independent care spend including Residential and nursing care for both 65+ year old and the 18-64 years old clients.

The service is seeing a significant increase in service demand. Client numbers have increased since April 2022 by 25% in the 65+ cohort and 15% in the 18-64 cohort with similar costs to existing cohorts. Previously there had been 14 years of stable demand in the 65+ cohort so this level of increase is unprecedented.

During 2022-23 the council received an additional £6m of one-off funding which mitigated the pressures of this increased demand, however there are currently no indications that there will be further grant funding that will offset this growth.

Thackley Green transferred on 1<sup>st</sup> July 2023 and is still in the transition stage and not yet a full capacity. This will result in additional independent care costs in the short term but will generate savings in future years.

As of September 2023, increased spend controls are being introduced within adult social care to aim to mitigate the increased demand, however it is prudent to highlight a negative movement in the forecast as a result of this demand. It is important to note that whilst an additional £1.436m risk is being

forecast at Period 6 compared to Period 5. The financial risk is higher, however this is after mitigations have been applied across the directorate these mitigations and interventions will be closely monitored.

- 3) The transfer payments relate to direct payments these costs are currently forecast to be delivered on budget.
- 4) The main areas of income include client contributions to care costs. This is forecast that an additional £300k is received.
- 5) The main area of spend shown as Other include client transport and other support costs this is forecasted to be delivered on budget.

5.35 Due to the volatile nature of the Adults Social Care budget, there may be further emerging risks whilst we progress through the financial year. This may include an unexpected increase in demand during the winter period, e.g., an increase in flu and other respiratory diseases, unexpected provider failures, additional pressures from acute hospitals, changes in caselaw and adverse weather. Mitigations would be sought to manage these pressures including, in exceptional circumstances, the use of reserves. This is an area the Council will continue to monitor closely.

#### **Assistant Director of Safeguarding and Wellbeing**

5.36 The **Assistant Director of Safeguarding and Wellbeing** is responsible for the strategic planning, engagement, operational and statutory delivery of key services for Adult Social Care. This includes ensuring services, practice and standards meet statutory requirements and that all professionals work together to deliver Making Safeguarding Personal to promote and secure the safety of local residents. The forecast outturn position for the **Assistant Director of Safeguarding and Wellbeing** is set out in the following table (Period 5 - £0k).

| <b>Assistant Director of Safeguarding and Wellbeing</b> | <b>£'000</b> |
|---|--------------|
| Expenditure   | 10,038       |
| Income  | (995)        |
| <b>Net Budget</b>                                       | <b>9,043</b> |
| Forecast  | 9,043        |
| <b>Variance</b>   | <b>0</b>     |

5.38 The forecast outturn relating to the **Assistant Director of Safeguarding and Wellbeing** is set out in the following table. The forecast at Period 5 assumes that this will be delivered on budget and that the savings detailed in **Appendix A** are achieved in year. These savings will continue to be tracked, and any impact of the achievability will form part of future reports.

| Ref | Description           | Budget       | Forecast Variance |             |
|-----|-----------------------|--------------|-------------------|-------------|
|     |                       |              | £'000             | %           |
|     |                       | £'000        | £'000             |             |
| 1   | Employees             | 8,793        | 0                 | 0.00        |
| 2   | Premises              | 396          | 0                 | 0.00        |
| 3   | Transport             | 324          | 0                 | 0.00        |
| 4   | Supplies and Services | 525          | 0                 | 0.00        |
| 5   | Income                | (995)        | 0                 | 0.00        |
|     | <b>Total</b>          | <b>9,043</b> | <b>0</b>          | <b>0.00</b> |

### Assistant Director of Commissioning and Performance

- 5.39 The **Assistant Director of Commissioning and Performance** is responsible for ensuring services, practice and standards meet statutory requirements and includes the commissioning and monitoring of Adults Social Care external contract. The forecast outturn position for the **Assistant Director of Commissioning and Performance** is set out in the following table (Period 5-£770k overspend).

| Assistant Director of Commissioning and Performance | £'000         |
|---|---------------|
| Expenditure   | 23,933        |
| Income  | (10,565)      |
| <b>Net Budget</b>                                   | <b>13,367</b> |
| Forecast  | 12,701        |
| <b>Variance</b>                                     | <b>(666)</b>  |

- 5.40 The forecast variance relating to the **Assistant Director Commissioning and Performance** is set out in following table and explanations for the variances are provided below the Table.

| Ref | Description          | Budget        | Forecast Variance |               |
|-----|----------------------|---------------|-------------------|---------------|
|     |                      |               | £'000             | %             |
|     |                      | £'000         | £'000             |               |
| 1   | Employees            | 4,099         | 0                 | 0.00          |
| 2   | Third party Payments | 18,518        | (666)             | (3.60)        |
| 3   | Income               | (10,565)      | 0                 | 0.00          |
| 4   | Other                | 1,315         | 0                 | 0.00          |
|     | <b>Total</b>         | <b>13,367</b> | <b>(666)</b>      | <b>(4.98)</b> |

- 1) The employee related costs are currently forecast to be delivered on budget.
- 2) The main areas of spend in relation to Third Party Payments are in respect of Better Care fund expenditure and the PPP Shaw contract.

The annual budget for the PPP Shaw contract which is for the provision of six residential care homes across North Northamptonshire for the over 65s is £9.8m. There is a forecast pressure of £970k (9.8%) in relation to this

contract. At the time the budget was set it was assumed that the inflationary increase would be £234k this was based on previous trends. The actual increase was based on average weekly earnings up to March 2023. A budget realignment exercise has taken place along with the identification of efficiencies which has resulted in mitigations of £1.636m.

- 3) The main income sources are the Improved Better Care Fund (£6.8m) and Client Contributions from PPP and Block purchased care provision (£1.4m). Other income sources assistive technology pool contribution of £747k, this is forecast to be delivered on budget.
- 4) Other costs amount to £1.315m and is primarily made up of Community Equipment spend, this is forecast to be delivered on budget.

### **Assistant Director Strategic Housing, Development and Property Services**

5.41 The **Assistant Director Strategic Housing, Development and Property Services** provides strategic direction and leadership for the delivery of the Housing Service and housing management, this includes support for homeless people. The forecast outturn position for the **Assistant Director Strategic Housing, Development and Property Services** set out in the following table (Period 5 - £0k).

| <b>Assistant Director Strategic Housing, Development and Property Services</b> | <b>£'000</b> |
|--|--------------|
| Expenditure  | 6,248        |
| Income   | (3,756)      |
| <b>Net Budget</b>  | <b>2,492</b> |
| Forecast   | 2,492        |
| <b>Variance</b>  | <b>0</b>     |

5.42 The forecast outturn relating to the Assistant Director **Strategic Housing, Development and Property Services** is set out in the following table. The forecast at Period 2 assumes that the service will be delivered on budget and that any savings detailed in **Appendix A** are achieved in year. Savings will continue to be tracked and changes to the deliverability will form part of future reports.

| <b>Description</b>    | <b>Budget</b> | <b>Forecast Variance</b> |             |
|-----------------------|---------------|--------------------------|-------------|
|                       |               | <b>£'000</b>             | <b>%</b>    |
|                       | <b>£'000</b>  | <b>£'000</b>             |             |
| Employees             | 2,060         | 0                        | 0.00        |
| Premises              | 203           | 0                        | 0.00        |
| Supplies and Services | 3,451         | 0                        | 0.00        |
| Third Party Payments  | 501           | 0                        | 0.00        |
| Other                 | 33            | 0                        | 0.00        |
| Income                | (3,756)       | 0                        | 0.00        |
|                       |               |                          |             |
| <b>Total</b>          | <b>2,492</b>  | <b>0</b>                 | <b>0.00</b> |

5.43 All services across Adults, Health Partnerships and Housing undertake regular budget monitoring, track fluctuations in spend, and work to identify additional efficiencies and savings to either mitigate forecasted overspends within the directorate or to contribute to the overall corporate position in year of the Council. Ongoing work continues to identify any further efficiencies, savings or income that can be identified to improve the overall position in-year, to set budgets for the following year, and in contributing to the medium-term financial strategy.

**Public Health and Communities**

5.44 The **Director of Public Health and Wellbeing** is a statutory officer and the principal adviser on all health matters to elected members, officers, and partners, with a leadership role spanning health improvement, health protection and healthcare public health. This includes delivering core public health services in line with grant funding and statutory requirements.

5.45 The grant is ringfenced and any variances will result in a movement to or from reserves ensuring that all grant conditions are met.

|  |              |
|--|--------------|
| <b>Director of Public Health and Wellbeing</b> | <b>£'000</b> |
| Expenditure                                    | 26,312       |
| Income   | (26,312)     |
| <b>Net Budget</b>                              | <b>0</b>     |
| Forecast                                       | 0            |
| <b>Variance</b>                                | <b>0</b>     |

5.46 The forecast outturn relating to the **Director of Public Health and Wellbeing** is set out in following Table.

| Description          | Budget   | Forecast Variance |             |
|----------------------|----------|-------------------|-------------|
|                      |          | £'000             | %           |
| Employees            | 4,891    | 0                 | 0.00        |
| Supplies & Services  | 6,808    | 0                 | 0.00        |
| Support Costs        | 1,240    | 0                 | 0.00        |
| Third Party Payments | 7,620    | 0                 | 0.00        |
| Transfer Payments    | 5,635    | 0                 | 0.00        |
| Income               | (26,312) | 0                 | 0.00        |
| Other                | 118      | 0                 | 0.00        |
| <b>Total</b>         | <b>0</b> | <b>0</b>          | <b>0.00</b> |

**Assistant Director Communities and Leisure**

5.47 The **Assistant Director Communities and Leisure** includes libraries, cultural facilities (such as museums, theatres, art galleries and heritage sites), sports and leisure facilities (such as swimming pools, tennis courts, golf, playing pitches, indoor courts/sports halls etc), archaeological archiving and activities and access to parks and open spaces for play and recreation. The Service is also responsible for community grants as well as providing education and

outreach services and advice and support, encouraging physical and mental wellbeing of residents through sport and leisure-based activities The forecast outturn position for the **Assistant Director Communities and Leisure** is set out in the following Table (Period 5 - £260k)

| <b>Assistant Director Communities and Leisure</b> | <b>£'000</b> |
|---|--------------|
| Expenditure                                       | 17,264       |
| Income  | (8,894)      |
| <b>Net Budget</b>                                 | <b>8,370</b> |
| Forecast  | 8,110        |
| <b>Variance</b>                                   | <b>(260)</b> |

5.48 The forecast outturn relating to the **Assistant Director of Communities and Leisure** is set out in following table and explanations for the variances are provided in the paragraphs that follow.

| <b>Description</b>   | <b>Budget</b> | <b>Forecast Variance</b> |             |
|----------------------|---------------|--------------------------|-------------|
|                      |               | <b>£'000</b>             | <b>%</b>    |
|                      | <b>£'000</b>  | <b>£'000</b>             |             |
| Employees            | 6,939         | 0                        | 0.00        |
| Premises             | 3,056         | 0                        | 0.00        |
| Supplies & Services  | 4,122         | 140                      | 3.40        |
| Third Party Payments | 3,699         | 0                        | 0.00        |
| Income               | (8,894)       | (400)                    | 4.50        |
| Internal Income      | (680)         |                          |             |
| Other                | 128           | 0                        | 0.00        |
|                      |               |                          |             |
| <b>Total</b>         | <b>8,370</b>  | <b>(260)</b>             | <b>0.00</b> |

- 1) The employee related costs are currently forecast to be delivered on budget.
- 2) The premises related costs are currently forecast to be delivered on budget.
- 3) The supplies and services costs are currently forecasting a pressure of £140k this is due to contractual increases. The service is continuing to look at how these costs can be mitigated.
- 4) The third-party payments are mainly made up of £2.893m for payments for the Ukraine resettlement programme these are currently forecasted to delivered on budget.
- 5) The main areas of income include £5.041m of grant income and £2.66m relating to fees and charges. The income is forecast to be £400k greater than budget and is a result of changes in VAT.
- 6) Other costs are forecast to be delivered on budget.

## Place and Economy Directorate

5.49 The Place and Economy budget covers the following four functional areas plus Management Costs:

- Assets and Environment
- Growth and Regeneration
- Highways and Waste
- Regulatory Services

### **Assistant Director Assets and Environment**

5.50 The **Assistant Director Assets and Environment**, includes Facilities Management, Property Estate Management, Energy and Fleet Management, Grounds Maintenance, Parks and Open Spaces and On and Off-street parking enforcement. It also includes Asset and Capital Management of the Council's corporate assets and capital programmes, together with the effective management of the Council's strategic assets and landholdings. Key income and cost drivers include parking income, number of visitors to country parks and open space, demand for commercial rental spaces, use of corporate workspaces and use of energy. The forecast outturn position for the **Assistant Director of Assets and Environment** is set out in the following table (Period 5 - £845k).

| <b>Assistant Director Assets and Environment</b> | <b>£'000</b> |
|--|--------------|
| Expenditure                                      | 25,204       |
| Income   | (21,054)     |
| <b>Net Budget</b>                                | <b>4,150</b> |
| Forecast   | 3,180        |
| <b>Variance</b>                                  | <b>(970)</b> |

5.51 The forecast variance relating to the **Assistant Director Assets and Environment** is set out in following Table and explanations for the variances are provided below the Table.

| Ref | Description           | Budget       | Forecast Variance |                |
|-----|-----------------------|--------------|-------------------|----------------|
|     |                       |              | £'000             | %              |
|     | <b>£'000</b>          | <b>£'000</b> | <b>£'000</b>      |                |
| 1   | Employees             | 9,754        | (572)             | (5.87)         |
| 2   | Premises              | 9,304        | 161               | 1.73           |
| 3   | Transport             | 4,957        | (239)             | (4.82)         |
| 4   | Supplies and Services | 1,694        | 4                 | 0.26           |
| 5   | Third Party Payments  | 1,024        | 102               | 9.95           |
| 6   | Income                | (21,054)     | (485)             | 2.30           |
| 7   | Other                 | (1,508)      | 60                | (3.96)         |
|     | <b>Total</b>          | <b>4,171</b> | <b>(970)</b>      | <b>(23.26)</b> |

1) The underspend of £572k (5.8%) against Employees relates to staff underspends from vacant posts due to ongoing work on restructures. Work is underway to recruit to posts through the restructure during 2023/24.

- 2) The main areas of spend within Premises are Business Rates (£1.565m), Utilities (£3.426m), Building Repairs and Maintenance (£1.522m), Rents and Services Charges (£985k), Building cleaning (£607k) and other premises costs of £1.177m.

There is a pressure of £251k relating to outstanding liabilities for business rates.

There is a saving of £124k on utility costs across the service. This underspend has reduced from Period 5 (£340k) due to a combination of outstanding liabilities for current and previous financial years. This has all been driven by the utility contracts review currently undertaken to ensure the best tariffs are utilised. Other minor pressures which amount to £34k.

- 3) The main areas of spend within Transport relates to Vehicle leasing (£2.918m), Fuel (£1.373m) and other transport costs of £676k.

There is a saving of £239k (17.4%) based on the current cost of fuel being lower than anticipated and reflects the reduction in the cost of fuel.

- 4) There is a pressure of £57k (21% of the £265k Equipment and Tools Budget) within Supplies and Services which relates to the maintenance of play equipment. This is offset by a saving within professional fees of £53k.

- 5) There is a pressure of £102k which predominately relates to a management fee for a business centre which will be occupied for a longer period than initially anticipated.

- 6) The main income sources are Rent and Leases (£17.217m), Parking Income (£1.680m) and various other forms of income amounting to £2.967m.

There is a pressure of £86k relating to external income that the Council had budgeted to receive to fund posts for projects such as Corby Town Funds. This pressure is offset by additional grant funding received for tree maintenance within Environment Services of £116k (51% of £226k Grants budget). There is also additional income from rent reviews and insurance recharges of £455k.

- 7) Other minor net pressures amount to £60k.

### **Assistant Director Growth and Regeneration**

- 5.51 The **Assistant Director Growth and Regeneration** includes Planning Services, Economic Development, Growth and Infrastructure, Regeneration, Digital Infrastructure, Climate Change and Flood and Water Management. Key income/costs drivers include local demand and volume of applications for the Planning service, including major development fees, availability of Planning resources e.g., planning professionals and demand for economic activities. The forecast outturn position for the **Assistant Director of Growth and Regeneration** is set out in the following Table (Period 5 - £268k).



|   |              |
|---|--------------|
| <b>Assistant Director Growth and Regeneration</b> | <b>£'000</b> |
| Expenditure                                       | 9,836        |
| Income  | (5,461)      |
| <b>Net Budget</b>                                 | <b>4,375</b> |
| Forecast  | 4,646        |
| <b>Variance</b>                                   | <b>271</b>   |

5.52 The forecast variance relating to the **Assistant Director Growth & Regeneration** is set out in following Table. Explanations for the variances are provided below the Table.

| Ref | Description           | Budget       | Forecast Variance |             |
|-----|-----------------------|--------------|-------------------|-------------|
|     |                       |              | £'000             | %           |
|     |                       | £'000        | £'000             |             |
| 1   | Employees             | 6,088        | 203               | 3.33        |
| 2   | Supplies and Services | 3,599        | 295               | 8.20        |
| 3   | Income                | (5,461)      | (193)             | 3.53        |
| 4   | Other                 | 149          | (34)              | (22.82)     |
|     |                       |              |                   |             |
|     | <b>Total</b>          | <b>4,375</b> | <b>271</b>        | <b>6.19</b> |

- 1) There is a pressure of £203k (3%) within Employees which relates to agency costs to cover vacant posts, which are predominantly covering vacancies due to the restructure of the service and challenges with recruiting hard to fill posts, particularly in the Planning Service. Work is underway to recruit to these posts following the restructure in 2023/24.
- 2) There is a pressure of £295k within Supplies and Services. This variance relates to professional and legal fees associated with appeals and judicial reviews within Planning Management and Enforcement. The budget amounts to £152k and results in a pressure of around 194%.
- 3) The main income sources are Planning Income (£2.773m) and other income which amounts to £616k. There is currently additional income of £193k (6.9%) forecast for planning income based on received and forecasted income for the financial year. The additional income relates to a couple of major applications received in Period 4.

The Department for Levelling Up, Housing and Communities responded to its consultation on increasing planning fees and performance which will result in an increase to Fees and Charges relating to Planning applications. An exact date is dependent on the regulations being debated and approved in Parliament; initial indications are that this could be in place from January 2024. It should be noted that the forecast for the remaining year is influenced by the result of the current economy, with both inflationary cost increases and an increased cost of borrowing detrimentally affecting investment in development.

- 4) There are minor savings amounting to £34k.

## Assistant Director Highways and Waste

5.53 The **Assistant Director for Highways and Waste** includes street cleaning, waste and recycling collections and disposals, including the household waste and recycling centres and Transport Management. The highways services maintain the extensive network of public roads, footpaths, and rights of way, including highway related infrastructure such as streetlights, traffic signals, bridges, gullies, and highway trees. Services also include School Transport and Concessionary fares. Key cost drivers include the tonnes of waste materials collected from households, businesses, and litter bins for recycling and disposal, variations to costs per tonnage, investment on various highway assets, as well as the impact of extreme weather conditions, school age population for school transport and the agility of the older population for concessionary fares. The forecast outturn position for the **Assistant Director of Highways and Waste** is set out in the following Table (Period 5 - £330k).

| <b>Assistant Director Highways and Waste</b> | <b>£'000</b>  |
|--|---------------|
| Expenditure                                  | 67,056        |
| Income                                       | (9,798)       |
| <b>Net Budget</b>                            | <b>57,258</b> |
| Forecast                                     | 56,871        |
| <b>Variance</b>                              | <b>(387)</b>  |

5.54 The forecast variance relating to the **Assistant Director for Highways and Waste** is set out in following Table. Explanations for the variances are provided below the Table.

| Ref | Description           | Budget        | Forecast Variance |               |
|-----|-----------------------|---------------|-------------------|---------------|
|     |                       | £'000         | £'000             | %             |
| 1   | Employees             | 9,748         | 86                | 0.88          |
| 2   | Supplies and Services | 7,767         | 39                | 0.50          |
| 3   | Transport             | 19,341        | (386)             | (2.00)        |
| 4   | Third Party Payments  | 31,030        | 74                | 0.24          |
| 5   | Income                | (9,798)       | (231)             | 2.36          |
| 6   | Other                 | (830)         | 31                | (3.73)        |
|     | <b>Total</b>          | <b>57,258</b> | <b>(387)</b>      | <b>(0.68)</b> |

- 1) There is a pressure on Employees of £152k relating to overtime and agency costs required to within refuse and recycling and Highways services whilst work is carried out to recruit to posts and complete the Waste procurement project. This is offset by a saving of £66k within Transport services due to vacant posts.
- 2) There is a minor pressure of £39k within Supplies and Services.
- 3) The main areas of spend within Transport relate to contract payments for Home to School Transport, Social Care Transport and Concessionary payments to transport operators.

The Department for Transport had requested that authorities continue to reimburse bus operators based on the average number of journeys in the winter months prior to the COVID-19 outbreak (December 2019 to February 2020).

The alternative is that the Council reverts to paying bus operators on the actual number of journeys. Reimbursing bus operators based on the average rather than the actual usage is estimated to be between £500k and £700k higher. The Council's support to the bus industry helps safeguard local bus services for residents throughout the pandemic and during the recovery period. The forecast underspend is £386k (13% of £2.868m Concessions budget).

The DfT are rebasing the reimbursement methodology for 2024/25 and announcements around this will be made later this year.

- 4) The main areas of spend relate to Waste Disposal (£17.470m), Street Lighting (£6.638m) and Highways Maintenance (£4.157m) and other third-party payments of £1.757m. These are currently forecast to come in on budget. There are budgetary challenges with regard to Highways Maintenance and the increased requirement for repairs due to the deterioration of the highway network, together with the effect of inflation on the cost of services. Work is ongoing to identify how the service can be delivered differently in order to remain within the allocated budget; this may require a change in approach to maintaining the highways network.

There is a £74k pressure relating to the Waste disposal due to increased tonnage levels.

- 5) There is a favourable variance of £49k within income which relates to the Garden Waste subscription service performing better than initially predicted. It is worth noting that whilst subscriptions have gone up the associated costs to deliver the service have also increased.

There is also additional income of £158k (51% of £307k Highways income budget) for Highways regulations and investigation searches arising because of higher-than-expected residential developments coming forwards, house sales and utility works. Other minor savings amount to £24k.

- 6) Other minor pressures amount to £31k.

### **Assistant Director Regulatory Services**

- 5.55 The **Assistant Director Regulatory Services** includes Bereavement Services, Building Control, Emergency Planning, Environmental Health, Trading Standards, and the Travellers Unit. The main income and cost drivers include the local economy and market for Building Control income, age/morbidity demographic rate for bereavement services (burials and cremations), public health demand for Environmental Health services, and legal/statutory obligations for building regulations and licensing. The forecast outturn position for the **Assistant Director of Regulatory Services** is set out in the following table (Period 5 - £217k).

| <b>Assistant Director Regulatory Services</b> | <b>£'000</b> |
|---|--------------|
| Expenditure                                   | 7,160        |
| Income  | (4,249)      |
| <b>Net Budget</b>                             | <b>2,911</b> |
| Forecast                                      | 2,640        |
| <b>Variance</b>                               | <b>(271)</b> |

5.56 The forecast variance relating to the **Assistant Director Regulatory Services** is set out in following Table. Explanations for the variances are provided below the Table.

| <b>Ref</b> | <b>Description</b> | <b>Budget</b> | <b>Forecast Variance</b> |               |
|------------|--------------------|---------------|--------------------------|---------------|
|            |                    |               | <b>£'000</b>             | <b>%</b>      |
|            | <b>£'000</b>       | <b>£'000</b>  |                          |               |
| <b>1</b>   | Employees          | 5,980         | (486)                    | (0.09)        |
| <b>2</b>   | Premises           | 690           | 41                       | 0.06          |
| <b>3</b>   | Income             | (4,249)       | 166                      | (0.04)        |
| <b>4</b>   | Other              | 489           | 8                        | 0.01          |
|            | <b>Total</b>       | <b>2,911</b>  | <b>(271)</b>             | <b>(9.29)</b> |

1) There is an underspend of £486k (9%) within Employees relating to salary savings which is offsetting the pressure on agency costs to support service delivery across Regulatory Services pending the restructuring of the service during 2023/24. An MTFP saving for 2023/24 of £185k for the restructure within Regulatory Services was approved of which £155k has been identified, leaving a pressure of £30k which will be covered by vacancies across the service. Work is currently being undertaken within the service area to deliver the saving.

2) The main areas of spend relate to Grounds Maintenance (£266k), Business Rates (£135k), Utilities (£213k) and other premises costs of £76k.

There are minor pressures of £41k within premises relating to increased business rates and utility pressures in Bereavement Services.

3) The main income sources are Bereavement Services (£2.226m), Building Control Income (£1m), Licensing Income (£936k), other minor income sources which amount to £266k.

The overall income forecast is a pressure of £166k. The forecast outturn for income from Bereavement Services is £111k higher than budget this is reflective of the 2022/23 outturn and activity levels remain similar in 2023/24. This is offset by a pressure on Building Control income where income levels are forecast to be £277k lower than budget with the forecast being based on 2022/23 activity levels due to a combination of unachievable income targets, market share reduction and economic climate. Other forms of income are forecast to be delivered on budget.

4) There is a minor pressure amounting to £8k.

## Place and Economy Management

- 5.57 This area includes the management costs for the Place and Economy Directorate and is forecast to be on budget (Period 5 - £0k).

| <b>Directorate Management</b> | <b>£'000</b> |
|-------------------------------|--------------|
| Expenditure                   | 652          |
| Income                        | 0            |
| <b>Net Budget</b>             | <b>652</b>   |
| Forecast                      | 652          |
| <b>Variance</b>               | <b>0</b>     |

## Enabling & Support Services

### Finance, Performance, Procurement and Revenues and Benefits

- 5.58 The **Finance and Performance Service** is responsible for leading the management, development, performance and continuous improvement of all Finance, Audit and Risk services. The **Procurement Service** leads on all aspects of procurement delivery, category management, commissioning and contract management. The **Revenue and Benefits Service** is responsible for the collection of both Council Tax and Business Rates and in assessing, awarding and payment of benefits. The forecast outturn position for these services is set out in the following Table (Period 5 - £120k).

| <b>Finance, Performance, Procurement and Revenue and Benefits Service</b> | <b>£'000</b>  |
|---|---------------|
| Expenditure   | 84,646        |
| Income  | (69,110)      |
| <b>Net Budget</b>   | <b>15,536</b> |
| Forecast  | 15,634        |
| <b>Variance</b>   | <b>98</b>     |

- 5.59 The forecast variance for the **Finance, Performance, Procurement and Revenues and Benefits Service** is set out below. Explanations for the variances are provided below the Table.

| Ref | Description         | Budget        | Forecast Variance |             |
|-----|---------------------|---------------|-------------------|-------------|
|     |                     |               | £'000             | %           |
|     |                     | £'000         | £'000             |             |
| 1   | Employees           | 17,059        | (247)             | (1.45)      |
| 2   | Supplies & Services | 2,976         | 465               | 15.63       |
| 3   | Transfer Payments   | 64,711        | 0                 | 0.00        |
| 4   | Other               | (100)         | (33)              | 33.00       |
| 5   | Income              | (69,110)      | (87)              | 0.13        |
|     |                     |               |                   |             |
|     | <b>Total</b>        | <b>15,536</b> | <b>98</b>         | <b>0.63</b> |

- 1) A saving of £247k is forecast for Employees (Period 5 - £212k). This is due to forecast staff savings within the procurement team (£147k) and the Internal

Audit team (£224k), partially offset by pressures from the use of agency staff within the Revenues & Benefits team (£124k).

- 2) Within Supplies and Services, the main areas of spend are Audit fees (£848k) and Insurance premiums (£1.140m) and there are forecast pressure of £465k (Period 5 - £465k). This pressure is a combination of an increase in Insurance premiums £300k (Period 5 - £300k) and a net pressure of £165k which mainly relates to a legal requirement to write to all direct debit customers, which is a one-off cost following the implementation of a new revenues system.
- 3) Transfer Payments relate to Housing Benefit payments, which are forecast to be delivered on budget.
- 4) Amounts shown within Other costs are largely payments to the Lead Authority Board for shared services provided to the Council (£619k). There is a forecast net saving of £46k (Period 5 - £31k). This is due to a pressure in the Account Payable and Accounts Receivable functions (£97k) being offset by savings on historic LGSS inter-authority charge budgets (£116k) and other minor items (£14k).
- 5) The main areas of income are Housing Benefit Subsidy and income received from government to cover the costs of collecting NNDR & Council Tax. There is a forecast saving of £87k (Period 5 - £87k saving), arising from new grant funding of £172k received within the Revenues & Benefits service, reflecting the additional work being undertaken during the cost-of-living crisis. This additional income is partially offset by unachievable legacy income targets of £85k.

### **Chief Executive's Office**

- 5.60 The functions managed through the **Chief Executive's Office** include the Chief Executive, the Assistant Chief Executive, Executive Support, Communications, Consultation, Engagement and Corporate Equalities, Print Room and the Web Team. The service supports teams across the authority, providing leadership and strategic direction to secure a cohesive and coordinated approach to the delivery of improved organisation-wide service provision, resource allocation and prioritisation. The forecast outturn position for the **Chief Executive's Office** is set out in the following Table (Period 5 - £38k).

| <b>Chief Executive's Office</b> | <b>£'000</b> |
|---------------------------------|--------------|
| Expenditure                     | 1,332        |
| Income                          | (27)         |
| <b>Net Budget</b>               | <b>1,305</b> |
| Forecast                        | 962          |
| <b>Variance</b>                 | <b>(343)</b> |

- 5.61 The forecast variance for the Chief Executives Office is set out in following Table. Explanations for the variances are provided below the Table.

| Ref | Description         | Budget<br>£'000 | Forecast Variance |               |
|-----|---------------------|-----------------|-------------------|---------------|
|     |                     |                 | £'000             | %             |
| 1   | Employees           | 1,758           | (389)             | (22.13)       |
| 2   | Supplies & Services | 438             | 36                | 8.22          |
| 3   | Other               | (864)           | 0                 | 0.00          |
| 4   | Income              | (27)            | 10                | (37.04)       |
|     |                     |                 |                   |               |
|     | <b>Total</b>        | <b>1,305</b>    | <b>(343)</b>      | <b>(0.26)</b> |

- 1) There are anticipated savings within the Executive Support, Communications and Printing services of £389k. This is due to staff vacancies within the team's new structure, which are actively being recruited (£629k), partially offset by the consequent use of agency staff (£240k).
- 2) The main areas of spend within Supplies and Services are printing and postage costs for the corporate print and post rooms. The forecast pressure, however, is due to inflationary increases in corporate subscriptions of £20k (Period 5 - £18k) and other minor pressures £16k (Period 5 - £20k).
- 3) 'Other' spend relates to internal recharges and is forecast to be delivered on budget.
- 4) The income budget relates to printing on behalf of third-party organisations. There is an anticipated pressure of £10k as demand for these services has fallen.

### **Chief Information Officer**

- 5.62 The **Chief Information Officer** is responsible for the delivery of efficient and effective management of all aspects of IT operations, Digital, IT programmes of work, IT commercial contracts and supplier relationships, IT Service delivery teams and for transforming the IT and Digital Services team. This includes managing IT services provided by West Northamptonshire Council. The forecast outturn position for the **Chief Information Officer** is set out in the following Table (Period 5 - £268k).

| <b>Chief Information Officer</b> | <b>£'000</b>  |
|----------------------------------|---------------|
| Expenditure                      | 10,311        |
| Income                           | (2)           |
| <b>Net Budget</b>                | <b>10,309</b> |
| Forecast                         | 10,597        |
| <b>Variance</b>                  | <b>298</b>    |

- 5.63 The forecast variance relating to the **Chief Information Officer** is set out in following Table and explanations for the variances are provided below the Table.

| Description          | Budget        | Forecast Variance |             |
|----------------------|---------------|-------------------|-------------|
|                      |               | £'000             | %           |
| Employees            | 2,197         | 100               | 4.55        |
| Supplies & Services  | 3,148         | (186)             | (5.91)      |
| Third Party Payments | 5,571         | 384               | 6.89        |
| Other                | (607)         | 0                 | 0.00        |
| <b>Total</b>         | <b>10,309</b> | <b>298</b>        | <b>2.89</b> |

- 1) Employee costs are forecast as a pressure of £100k (Period 5 - £177k). This includes a pressure of £91k which relates to staff costs that were previously capitalised. These costs can no longer be treated as capital where the system is Cloud based, as this is a revenue cost. A further £245k relates to agency costs and these are partially offset by forecast savings from vacant posts of £236k.
- 2) The main areas of spend in Supplies and Services are software license costs, data line rental and telephone costs. There are anticipated savings of £194k on software licences, mainly relating to Microsoft licences, and minor pressures of £8k.
- 3) Third Party Payments relate to the shared IT service with WNC. The pressure reflects estimated inflationary increases from the Service Level Agreement (SLA) with WNC, which amount to £384k (Period 5 £91k). Detailed work is ongoing to identify and evaluate other pressures within the WNC IT SLA.
- 4) 'Other' relates to internal income recharges and these are forecast to be delivered on budget.

### Customer and Governance

#### **Assistant Director of Human Resources**

- 5.64 The **Assistant Director of Human Resources** is responsible for the leadership, development and implementation of relevant strategies for the area and council, enabling the delivery of corporate HR priorities, including HR Advisory, Workforce Planning & Development, Learning & Development and Health & Safety. The forecast outturn position for the **Assistant Director of Human Resources** is set out in the following Table (Period 5 - £31k).

| <b>Assistant Director of Human Resources</b> | <b>£'000</b> |
|--|--------------|
| Expenditure                                  | 5,263        |
| Income                                       | (1,537)      |
| <b>Net Budget</b>                            | <b>3,726</b> |
| Forecast                                     | 3,757        |
| <b>Variance</b>                              | <b>31</b>    |

- 5.65 The forecast outturn relating to the **Assistant Director of Human Resources** is set out in following Table:



| Ref | Description          | Budget<br>£'000 | Forecast Variance |             |
|-----|----------------------|-----------------|-------------------|-------------|
|     |                      |                 | £'000             | %           |
| 1   | Employees            | 4,995           | 0                 | 0.00        |
| 3   | Supplies & Services  | 503             | 31                | 6.16        |
| 4   | Third Party Payments | 418             | 0                 | 0.00        |
| 4   | Other                | (653)           | 0                 | 0.00        |
| 5   | Income               | (1,537)         | 0                 | 0.00        |
|     |                      |                 |                   |             |
|     | <b>Total</b>         | <b>3,726</b>    | <b>31</b>         | <b>0.83</b> |

- 1) Employee related costs are expected to be delivered on budget.
- 2) The main areas of spend in Supplies and Services arise from work on the Pay & Grading project (£100k) and I-learn licences (£91k). While these are forecast to be delivered on budget, there is a forecast pressure of £31k (Period 5 - £31k) arising from an increased demand for learning and development within the Adults Directorate.
- 3) The main area of spend in Third Party payments is the recharge from WNC for the shared Payroll function.
- 4) 'Other' relates to support service recharges. These are expected to be delivered on budget.
- 5) The main areas of income relate to the Inter Authority Agreements (IAA) with WNC and NCT. These are expected to be delivered on budget.

### **Assistant Director of Legal and Democratic Services**

5.66 The **Assistant Director of Legal and Democratic Services** is responsible for developing and delivering a strong governance and ethical framework and the management of the internal Legal Services Team, Democratic & Election Services, FOI & Data Governance and Registration and the Coroners Services. The forecast outturn position for the **Assistant Director of Legal and Democratic Services** is set out in the following Table (Period 5 – £81k).

| <b>Assistant Director of Legal and Democratic</b> | <b>£'000</b> |
|---|--------------|
| Expenditure                                       | 5,895        |
| Income  | (896)        |
| <b>Net Budget</b>                                 | <b>4,999</b> |
| Forecast  | 5,299        |
| <b>Variance</b>                                   | <b>300</b>   |

5.67 The forecast variance relating to the **Assistant Director of Legal Services** is set out in the following Table and explanations for the variances are provided below the Table.

| Ref | Description          | Budget<br>£'000 | Forecast Variance |             |
|-----|----------------------|-----------------|-------------------|-------------|
|     |                      |                 | £'000             | %           |
| 1   | Employees            | 3,661           | 8                 | 0.22        |
| 3   | Supplies & Services  | 1,963           | 22                | 1.12        |
| 3   | Third Party Payments | 762             | 179               | 23.49       |
| 4   | Other                | (491)           | 6                 | (1.22)      |
| 5   | Income               | (896)           | 85                | (9.49)      |
|     | <b>Total</b>         | <b>4,999</b>    | <b>300</b>        | <b>6.00</b> |

- 1) The forecast pressure on the Employees budget of £8k (Period 5 - £185k Underspend) is due to vacancies £1.351m (Period 5 - £943k), offset by the use of agency staff £1.359m (Period 5 - £758k). The majority of the use of agency staff is in Legal Services.
- 2) The main areas of expenditure within Supplies and Services are members allowances, ward initiative funds and external legal fees. There are minor forecast pressures of £22k (Period 5 - £12k Saving).
- 3) The main area of spend within Third Party Payments is the shared coroners service with WNC, where there is a forecast pressure of £179k (Period 5 - £100k).
- 4) 'Other' relates mainly to support service recharges, members travel expenses and staff mileage. There is a forecast pressure of £6k (Period 5 - £16k) relating to a series of minor items.
- 5) The main areas of income are Legal fees (£200k) and Registration Services fees (£630k). There are also other minor income sources within the service (£66k). There is a forecast pressure of £85k within Registration Services due to a lower number of marriage ceremonies being delivered this year.

### Assistant Director of Customer Services

- 5.68 The **Assistant Director of Customer Services** is responsible for leading and implementing the transformation and aggregation of all the Customer Service and Complaints teams and for setting the key priorities and direction for Customer Services and Complaints in line with the corporate plan. The role is also responsible for the leadership, development and implementation of customer and digital strategies for the council, to deliver an improved customer experience and the administration of the 'Blue Badges' parking scheme. The forecast outturn position for the **Assistant Director of Customer Services** is set out in the following Table (Period 5 – £16k).

| Assistant Director Customer Services | £'000        |
|--------------------------------------|--------------|
| Expenditure                          | 2,113        |
| Income                               | (108)        |
| <b>Net Budget</b>                    | <b>2,005</b> |
| Forecast                             | 1,829        |
| <b>Variance</b>                      | <b>(176)</b> |

5.69 The forecast outturn relating to the **Assistant Director of Customer Services** is set out in the following Table.

| Ref | Description         | Budget       | Forecast Variance |               |
|-----|---------------------|--------------|-------------------|---------------|
|     |                     |              | £'000             | %             |
|     |                     |              | £'000             |               |
| 1   | Employees           | 2,821        | (158)             | (5.60)        |
| 2   | Supplies & Services | 159          | (18)              | (11.32)       |
| 3   | Other               | (867)        | 0                 | 0.00          |
| 4   | Income              | (108)        | 0                 | 0.00          |
|     |                     |              |                   |               |
|     | <b>Total</b>        | <b>2,005</b> | <b>(176)</b>      | <b>(8.78)</b> |

- 1) There is a forecast saving of £158k due to vacant posts within the Customer Service team.
- 2) Although the main area of spend within Supplies and Services relates to the issuing of Blue badges (£70k), the saving of £18k (Period 5 - £16k) arises from a series of minor budgets.
- 3) 'Other' budgets are internal recharges and are expected to be delivered on budget.
- 4) The income budget relates to the issuing of blue badges (£80k) and rent from the NHS Phlebotomy unit in the Kettering Offices (£28k). These are anticipated to be delivered on budget.

## **6 Housing Revenue Account**

---

6.1 Whilst North Northamptonshire Council must only operate one HRA it will, for a period of time, operate two separate Neighbourhood Accounts (Corby Neighbourhood Account and the Kettering Neighbourhood Account).

### **Corby Neighbourhood Account**

6.2 The forecast position for the Corby Neighbourhood Account at the end of Period 6 shows an overspend of £20k (Period 5 - £4k overspend). This is summarised in the following Table:

| <b>Corby Neighbourhood Account</b> |  |   |                                       |
|------------------------------------|--|---|---------------------------------------|
|                                    | <b>Current<br/>Budget<br/>2023/24<br/>£000</b> | <b>Projection<br/>P6<br/>2023/24<br/>£000</b> | <b>Forecast<br/>Variance<br/>£000</b> |
| <b>INCOME</b>                      |  |   |                                       |
| Rents - Dwellings Only             | 20,692   | 20,677  | 15                                    |
| Service Charges                    | 641  | 605   | 36                                    |
| HRA Investment Income              | 148  | 148   | 0                                     |
| <b>Total Income</b>                | <b>21,481</b>                                  | <b>21,430</b>                                 | <b>51</b>                             |
| <b>EXPENDITURE</b>                 |  |   |                                       |
| Repairs and Maintenance            | 6,440  | 6,689   | 249                                   |
| General Management                 | 5,438  | 5,432   | (6)                                   |
| HRA Self Financing                 | 2,125  | 2,125   | 0                                     |
| Revenue Contribution to Capital    | 4,875  | 4,875   | 0                                     |
| Transfer To / (From) Reserves      | 807  | 807   | 0                                     |
| Special Services                   | 1,014  | 787   | (227)                                 |
| Other                              | 782  | 735   | (47)                                  |
| <b>Total Expenditure</b>           | <b>21,481</b>                                  | <b>21,450</b>                                 | <b>(31)</b>                           |
| <b>Net Operating Expenditure</b>   | <b>0</b>                                       | <b>20</b>                                     | <b>20</b>                             |

- 6.3 The forecast position for rental income from dwellings at Period 6 is £15k lower than budget – a rent gain of £68k is a result of the Right to Buy Sales being 15 less than the budgeted amount of 50 in 2022/23, resulting in a higher number of dwellings on 1<sup>st</sup> April 2023 resulting in a higher rental yield. RTB sales were budgeted at 50 the current forecast is 43 which results in a rent gain of £11k being the part year effect from RTB sales. The reduction is in part from the current economic climate and the increased costs in borrowing, however, this is reduced by a shortfall of £94k due to lost income from a higher void rate. The number of sales and void rates are areas that will be closely monitored during the course of the year.
- 6.4 The pressure on income from Service Charges is £36k this is a result of a £19k increase in the budget not being realised and £17k of optional emergency alarm charges not being taken up in the sheltered schemes.
- 6.5 The forecast position for Period 6 includes a reduction in expenditure of £31k (Period 5 - £44k).
- 6.6 There are pressures on repairs and maintenance costs of £249k, which relate to the higher cost of materials (£176k), overspends on salaries due to agency costs (£88k), and overspends on services costs due to disrepair claims (£109k). These are partly offset by increased income from recharged services (£108k). There are other minor favourable variances of £16k.
- 6.7 There are savings of £6k in General Management and £227k in Special Services which mainly relate to salary savings (£152k) due to vacant posts, savings on services (£40k) and utilities (£42k) due to lower than expected costs. There were further minor adverse variances of £1k.
- 6.8 There are savings within 'Other' which relates to the bad debt provision being £50k less than budgeted - owing to higher collection on arrears (Period 5 - £50k). There were minor adverse variances of £3k.

- 6.9 The Council made provision for a 4% pay award in 2023-24 the Pay award will exceed the budget as the offer by the employers already exceeds the pay inflation allowed. The forecast outturn will be updated following the conclusion of the national pay negotiations and any additional pressures up to £66k would initially be funded from the contingency budget.

### Kettering Neighbourhood Account

- 6.10 The forecast position for the Kettering Neighbourhood Account at the end of Period 6 shows an overspend of £32k (Period 5 - £11k overspend). This is summarised in the following Table:

| <b>Kettering Neighbourhood Account</b> |                                       |                                      |                              |
|--|---------------------------------------|--------------------------------------|------------------------------|
|  | <b>Current<br/>Budget<br/>2023/24</b> | <b>Projection<br/>P6<br/>2023/24</b> | <b>Forecast<br/>Variance</b> |
|  | <b>£000</b>                           | <b>£000</b>                          | <b>£000</b>                  |
| <b>INCOME</b>                          |                                       |                                      |                              |
| Rents - Dwellings Only                 | 16,763                                | 16,746                               | 17                           |
| Service Charges                        | 487                                   | 446                                  | 41                           |
| HRA Investment Income                  | 21                                    | 21                                   | 0                            |
| <b>Total Income</b>                    | <b>17,271</b>                         | <b>17,213</b>                        | <b>58</b>                    |
| <b>EXPENDITURE</b>                     |                                       |                                      |                              |
| Repairs and Maintenance                | 4,632                                 | 4,850                                | 218                          |
| General Management                     | 2,988                                 | 2,866                                | (122)                        |
| HRA Self Financing                     | 4,986                                 | 4,986                                | 0                            |
| Revenue Contribution to Capital        | 3,268                                 | 3,268                                | 0                            |
| Transfer To / (From) Reserves          | (565)                                 | (565)                                | 0                            |
| Special Services                       | 1,257                                 | 1,233                                | (24)                         |
| Other                                  | 705                                   | 607                                  | (98)                         |
| <b>Total Expenditure</b>               | <b>17,271</b>                         | <b>17,245</b>                        | <b>(26)</b>                  |
| <b>Net Operating Expenditure</b>       | <b>0</b>                              | <b>32</b>                            | <b>32</b>                    |

- 6.11 The forecast position for rental income from dwellings at Period 6 is £17k lower than budget – a rent gain of £67k is a result of the Right to Buy Sales being 14 less than the budgeted amount of 30 in 2022/23, resulting in a higher number of dwellings on 1<sup>st</sup> April 2023 resulting in a higher rental yield. RTB sales were budgeted at 30 the current forecast is 20 which results in a rent gain of £24k being the part year effect from RTB sales. The reduction is in part from the current economic climate and the increased costs in borrowing, however, this is reduced by a shortfall of £108k due to lost income from a higher void rate. The number of sales and void rates are areas that will be closely monitored during the course of the year.
- 6.12 There are pressures of £41k as a result of income from service charges being lower than budget.
- 6.13 The forecast position for Period 6 is a reduction in expenditure of £26k (Period 5 - £44k).

- 6.14 There are pressures in Repairs and Maintenance of £218k, which relates to the higher cost for materials (£206k) and an overspend on salaries due to agency costs (£187k). These are partly offset by savings on subcontractor costs (£39k), equipment costs (£40k) and cyclical maintenance costs (£117k). There were also minor adverse variances of £21k.
- 6.15 There are savings of £122k in General Management and £24k in Special Services which mainly relate to salary savings (£130k) due to vacant posts. There were further minor favourable variances of £16k.
- 6.16 There are savings within 'Other' which relates to the bad debt provision being £98k less than budgeted - owing to higher collection on arrears (Period 5 - £50k).
- 6.17 The Council made provision for a 4% pay award in 2023-24 the Pay award will exceed the budget as the offer by the employers already exceeds the pay inflation allowed. The forecast outturn will be updated following the conclusion of the national pay negotiations and any additional pressures up to £176k would initially be funded from the contingency budget.
- 6.18 There could be further pressures to the two Neighbourhood Accounts as the HRA holds a depreciation charge that recognises the cost of managing and maintaining the Council stock at the current level. This funding represents a revenue cost to the HRA that is then used to support the capital programme to deliver the required enhancements to the stock to keep it fit for purpose. The revenue contribution to capital expenditure as a minimum must equal the depreciation charge and the value of the housing stock has increased resulting in a higher Revenue Contribution to Capital, the actual valuations will be confirmed as part of the final accounts process. These pressures would be mitigated by utilising the attributable debt from Right to Buy Sales.

## **7 Dedicated Schools Grant**

---

- 7.1 The Dedicated Schools Grant (DSG) is a ring-fenced specific grant allocated to the Council by the Government to support a range of education related services.
- 7.2 The Department for Education (DfE) currently operate a four-block funding model for funding schools and pre-16 education including early years as set out in the following table:

| <b>Dedicated Schools Grant (DSG)</b>  |  |   |  |
|---|--|---|--|
| <b>Schools Block</b>  | <b>Central Schools Services Block</b>  | <b>High Needs Block</b>   | <b>Early Years Block</b>   |
| The School's Block is the largest element of the DSG and is allocated to Schools and Academies for day-to-day spending in their individual budgets. | The Central Schools Block provides funding for local authorities to carry out central functions on behalf of maintained schools and academies. | The High Needs funding system supports provision for Children and Young People with Special Educational Needs and Disabilities (SEND) from their early years to age 25. | The Early Years Block provides funding for 2-, 3- and 4-year-olds. |

- 7.3 The original DSG Budget for 2023/24 amounts to £354.963m. After allowing for recoupment, which is where a local authority's DSG allocation is adjusted to reflect the grant that has been paid direct to academies. In July, the DSG allocation was revised to reflect a reduction of £537k, there was a reduction of £382k in the Early Years Block due to lower participation numbers, this was partially offset by a slight increase in the High Needs Block of £74k resulting from additional funding for special free schools. The remaining reduction of £229k relates to the recoupment amount for the High Needs Block being adjusted from £10.853m to £11.082m this is due to an adjustment to the High Needs places. The revised net DSG budget for the Council is £120.663m. The forecast outturn is a pressure of £6.404m, this is summarised in the following Table:

| <b>Dedicated Schools Grants Forecast Outturn 2023/24</b> |                     |                                       |                       |                   |                   |                           |                 |
|--|---------------------|---------------------------------------|-----------------------|-------------------|-------------------|---------------------------|-----------------|
| <b>Block</b>   | <b>Gross Budget</b> | <b>July DSG Allocation Adjustment</b> | <b>Revised Budget</b> | <b>Recoupment</b> | <b>Net Budget</b> | <b>Forecast Net Spend</b> | <b>Variance</b> |
|  | <b>£'000</b>        | <b>£'000</b>                          | <b>£'000</b>          | <b>£'000</b>      | <b>£'000</b>      | <b>£'000</b>              | <b>£'000</b>    |
| Schools Block  | 270,284             | 0                                     | 270,284               | 222,910           | 47,374            | 47,374                    | 0               |
| Central Schools Block                                    | 3,287               | 0                                     | 3,287                 | 0                 | 3,287             | 3,287                     | 0               |
| High Needs Block   | 57,851              | 74                                    | 57,925                | 11,082            | 46,843            | 53,247                    | 6,404           |
| Early Year Block   | 23,541              | (382)                                 | 23,159                | 0                 | 23,159            | 23,159                    | 0               |
| <b>Total</b>   | <b>354,963</b>      | <b>(308)</b>                          | <b>354,655</b>        | <b>233,992</b>    | <b>120,663</b>    | <b>127,067</b>            | <b>6,404</b>    |

- 7.4 The national pressure on services to support the education of children with additional needs is well documented. This has been exacerbated by the ongoing impacts of COVID on children and young people's health and wellbeing. Many Councils are struggling to contain expenditure within the budget available to meet needs. The mitigation actions that are available often have front loaded costs and benefits are felt over the course of many years. Whilst funding has been increased, this has not reflected the full increase in needs that are being identified.

7.5 In the financial year 2022/23 NNC reported an overspend of £1.8m on the HNB. This was offset against the historic surplus of £2.5m that had been brought forward from 2021/22, leaving a reserves balance of £700k, the reserve has been revised to reflect an Early Years clawback for 2022-23 financial year, amounting to £220k. For 2023/24, pressures have continued to increase, and it is now forecast that the HNB overspend will be overspent by £6.884m. The remaining reserves of £480k have been used to mitigate this, leaving a forecast overspend of £6.404m. The composition of these pressures prior to the use of reserves is as follows:

- The ongoing increase in the number of requests for Education, Health and Care Plans (EHCP), at Early Years and statutory school age, has exceeded the rate that was used in setting the budget, this pressure is forecast to be around £1.828m.
- A greater proportion of EHCP identifying high level needs and requiring higher levels of funding to be fully met, this pressure is forecast to be around £487k. (SENDIF)
- Sufficiency issues in local SEND placements meaning greater use of Independent Providers at significantly higher cost, this pressure is forecast to be around £3.404m.
- The identification of historic commitments that remain outstanding and must now be paid is a one-off pressure and amount to around £500k.
- Pressures in Mainstream Top Ups are related to an ongoing increase in the number of requests for statutory assessment over and above the level budgeted for. By supporting mainstream schools to meet higher levels of need, pressure is reduced on the specialist placement budgets, this pressure is forecasted to around £1.153m.
- Analysis has been conducted on the Alternative Provision budget, indicating a potential forecasted underspend of £414k. This budget is currently under further review and is subject to change.
- The High Needs budget saw an increase due to an adverse movement in the import-export review and an increase in funding allocated to Special schools the net favourable effect was a £74k increase.

7.6 Significant work has already been undertaken to put in place actions to mitigate pressures, these include:

- Collaborative work with two local special schools to create outreach service to support inclusion in mainstream settings and identify needs, and strategies to meet these, at the earliest opportunity.
- The creation of additional SEND places in Special Schools and Special School satellite provision on mainstream school sites.
- The creation of new SEND units in mainstream schools.



- Development of an early Years SEND provision.
- Partnership working with an outstanding Alternative Provision (AP) Academy Trust to create new capacity in NNC.
- Improved commissioning arrangements with independent providers to control costs and provide greater consistency of delivery.
- Joint commissioning work with health services to improve and widen provision of Speech and Language services.
- Greater focus on the Annual Review process to identify where needs have reduced or an EHCP is no longer required.
- Investment in the EHCP team to ensure needs are assessed in as accurate and timely manner as possible.
- Improved decision-making processes that ensure thresholds and funding decisions are robust and consistent.

7.7 This work is ongoing, and a key focus will be the identification of opportunities to create further capacity. NNC was not successful in a bid to DfE for a new Special Free School in the area, as such other routes to creating this capacity are being investigated. A separate bid for a Free AP provision is with DfE and an outcome is expected shortly.

7.8 Further opportunities to create SEND places are being developed in partnership with local Special and Mainstream schools. The impact of the outreach services is being assessed with a view to extending these and targeting resources as effectively as possible as part of a wider focus on inclusion. A simplification of EHCP funding through the adoption of a banded system will reduce pressure on the EHCP team and give schools and providers greater clarity and stability. The Education Case Management System will offer significantly improved financial functionality and rigour, improve parental access to information about the progress of an EHCP and create efficiencies in the EHCP process.

7.9 Where a local authority has an overall deficit on its DSG account at the end of the financial year, or where a surplus has substantially reduced during the year, they must provide information to the DfE about pressures and savings on the High Needs Budget as part of a DSG Deficit Management Plan. In addition, where there is a deficit, this will have an adverse impact on the Council's cashflow position and will impact on the resources available for investment – which will result in the investment income being lower.

7.10 Looking to 2024/25, it seems unlikely that any increase in government funding will meet the impact of the ongoing pressures identified, however the mitigation actions taken will continue to contribute to minimise these, but further actions will be required. The Council will be looking to work with the Schools Forum to consider a transfer of funding from the Schools Block (SB) of the DSG to HNB. This was not requested this year due to the pressure on schools' budget

and the DSG surplus the Council was holding at the time. If agreed, this would generate circa £1.7m additional funding for the HNB. Forum will also be asked to look at measures that will support inclusion in mainstream settings and provide challenge where any school may not be meeting this standard.

- 7.11 Identifying and meeting the needs of children and young people with SEND at the earliest opportunity and putting in place appropriate actions to meet these needs, remains the central focus of all of this work. Ensuring that the whole system works in an inclusive and joined up way is key to meeting this aspiration and to ensuring the efficient use of available resources to manage costs effectively.
- 7.12 At Spring Budget, the Chancellor announced additional funding for the existing early years entitlements worth £204m in 2023-24 (from September 2023) and £288m in 2024-25. This is for local authorities to increase hourly rates paid to childcare providers for the government's existing entitlement offers.
- 7.13 In July the Government announced that for 2023-24, that this will be distributed to LAs through a new standalone top-up grant called the Early Years Supplementary Grant (EYSG) and that the individual authority allocations would be announced in September. Details of the allocations will be provided in a future report.

## **8 Conclusions**

---

- 8.1 The forecast for 2023/24 is an overspend of £7.575m (Period 5 - £7.821m) based on the position as at the end of Period 5. The Council's contingency budget of £3.746m has not, as yet been used to mitigate these pressures recognising the risks that remain within the forecast, most notably pay and price inflation. Service Directors will be working to mitigate these pressures in-year, including those of the Children's Trust. The Council also holds earmarked reserves which may be utilised if mitigations are not identified to fund the current pressures.
- 8.2 The key risks which are set out in the report will continue to be monitored and actions sought as required throughout 2023/24. The achievement of the approved savings targets is also integral to this process and will continue to be monitored and reported.

## **9 Implications (including financial implications)**

---

### **9.1 Resources, Financial and Transformation**

- 9.1.1 The financial implications are set out in this report. The current forecast position for the General Fund is an overspend of £7.575m (Period 5 - £7.821m) and the Housing Revenue Account is forecasting an overspend of £52k (Period 5 - £15k overspend), the Dedicated Schools Grant is forecasting a pressure of £6.4045m (Period 5 - £4.995m).

## **8.2 Legal and Governance**

9.2.1 The provisions of the Local Government Finance Act 1992 set out requirements for the Council to set a balanced budget with regard to the advice of its Chief Finance Officer (Section 151 Officer).

8.2.2 The robustness of the budget estimates and the adequacy of the proposed reserves were considered under Section 25 of the Local Government Act 2003 prior to the Council agreeing its 2023/24 budget.

## **8.3 Relevant Policies and Plans**

9.3.1 The budget provides the financial resources to enable the Council to deliver on its plans and meet corporate priorities as set out in the Council's Corporate Plan.

## **8.4 Risk**

8.4.1 The deliverability of the 2023/24 Revenue Budget is monitored by Budget Managers and Assistant Directors. Where any variances or emerging pressures are identified during the year then mitigating actions will be sought and management interventions undertaken.

8.4.2 Details of pressures, risks and mitigating actions implemented will be provided as part of the finance monitoring reports as the year progresses. The main risks identified include demand led services such as Adult Social Care, children's services, and home to school transport together with the impact of high levels of inflation.

8.4.3 Whilst services will work hard to offset pressures, the Council holds a number of reserves to help safeguard against the risks inherent within the budget for 2023/24.

## **8.5 Consultation**

8.5.1 The 2023/24 budget was subject to consultation prior to approval by Council in February 2023.

## **8.6 Consideration by Executive Advisory Panel**

8.6.1 Not applicable.

## **8.7 Consideration by Scrutiny**

8.7.1 The budget monitoring reports are presented to the Finance and Resources Scrutiny Committee for review after they have been presented to the Executive Committee.

## **8.8 Equality Implications**

8.8.1 There are no specific issues as a result of this report.

## **8.9 Climate and Environment Impact**

8.9.1 Among the new Council's priorities will be putting in place plans to improve the local environment and tackle the ongoing climate emergency. Where these have a financial impact then it will be reflected in the budget.

## **8.10 Community Impact**

9.10.1 No distinct community impacts have been identified because of the proposals included in this report.

## **8.11 Crime and Disorder Impact**

8.11.1 There are no specific issues arising from this report.

## **9 Issues and Choices**

---

9.1 The report focuses on the forecast revenue outturn against budget for 2023/24 and makes recommendations for the Executive to note the current budgetary position and as such there are no specific choices within the report.

## **10 Background Papers**

---

11.1 The following background papers can be considered in relation to this report.

Final Budget 2023/24 and Medium-Term Financial Plans, including the Council Tax Resolution, North Northamptonshire Council, 23<sup>rd</sup> February 2023.

Monthly Budget Forecast Reports to the Executive.

| Appendix A                             |                              |   |  |                 |       |         |       |
|--|------------------------------|---|--|-----------------|-------|---------|-------|
| Directorate                            | Assistant Director           | Proposal Title  | Proposal Description   | 2023/24<br>£000 | Red   | Amber   | Green |
| Children & Education                   | Assistant Director Education | DFE SEND Review/Multi Agency SEND Self Assessment and Action Plan | Additional resources to meet the increase and clear the back log relating to Education and Health Care Plans. An additional amount of £700k was included in the 22/23 Budget.                | (175)           | (175) |         |       |
| Children & Education                   | Assistant Director Education | Teachers Pensions   | Budget Realignment for historical contribution for the Teachers Pensions Fund  | (275)           |       |         | (275) |
| Children & Education                   | Assistant Director Education | DSG Funding   | Budget Realignment of the DSG contribution towards the historical contribution for the Teachers Pensions Fund  | (462)           |       |         | (462) |
| Children & Education                   | Commissioning & Partnerships | Additional Demand - Payments to other Establishments              | Disaggregated Additional Demand - Payments to other Establishments Budget for Children, Families and Education, budget not utilised  | (691)           |       |         | (691) |
| Children & Education                   | Commissioning & Partnerships | Disaggregated Budget not required                                 | Disaggregated Budget - budget not utilised   | (412)           |       |         | (412) |
| Adults, Health, Partnerships & Housing | Adult Services               | CCG Discharge Packages Covid 19                                   | Reversal of one off Covid Pressure relating to 2021/22   | (513)           |       |         | (513) |
| Adults, Health, Partnerships & Housing | Adult Services               | Strengths based working   | Transformation of adult social care pathways and processes to ensure focus on client outcomes, independence, better decision making and best practice approaches to reduce delays and spend. | (587)           |       | (587)   |       |
| Adults, Health, Partnerships & Housing | Adult Services               | Demographic and prevalence pressures adult social care            | Reduction in demand due to Provider transformation Phase 1 - Specialist Care Centre  | (1,189)         |       | (1,189) |       |
| Adults, Health, Partnerships & Housing | Adult Services               | Staffing  | Savings from review of wider staffing budget to fund Social Worker Market Forces   | (100)           |       |         | (100) |
| Adults, Health, Partnerships & Housing | Safeguarding and Wellbeing   | Staffing  | Disaggregation of Shared Lives to be managed within the wider provider services staffing   | (23)            |       |         | (23)  |
| Adults, Health, Partnerships & Housing | Commissioning & Performance  | Shaw PPP  | Reduction in number of residential placements made in the independent sector owing to increase utilisation beds in PPP properties.   | (1,192)         |       | (1,192) |       |
| Adults, Health, Partnerships & Housing | Commissioning & Performance  | Shaw PPP  | Increase utilisation of capacity within Discharge to Access  | (1,058)         | (617) | (441)   |       |
| Adults, Health, Partnerships & Housing | Commissioning & Performance  | Contract Rationalisation  | Increasing utilisation of framework providers for homecare and reduction of more expensive spot contracts  | (67)            |       |         | (67)  |
| Adults, Health, Partnerships & Housing | Commissioning & Performance  | Staffing  | Saving of wider staffing budget to fund PBSS   | (125)           |       | (125)   |       |
| Adults, Health, Partnerships & Housing | Housing                      | Homelessness Policy Changes                                       | Harmonisation of Homelessness Policies   | (200)           |       |         | (200) |
| Adults, Health, Partnerships & Housing | Housing                      | Maximisation of Grant   | Capitalisation of posts for work relating to Disabled Facility Grants  | (127)           |       |         | (127) |
| Adults, Health, Partnerships & Housing | Director of Public Health    | Realignment of Grant  | Realignment of grant following disaggregation  | (138)           |       |         | (138) |
| Public Health & Communities            | Communities                  | Income generation   | Fees and Charges - Leisure   | (195)           |       |         | (195) |
| Public Health & Communities            | Communities                  | Efficiencies  | Legacy budgets no longer required  | (42)            |       |         | (42)  |
| Public Health & Communities            | Communities                  | Efficiencies  | Review of Strategic Grants   | (7)             |       |         | (7)   |
| Public Health & Communities            | Communities                  | Staffing  | Service Transformation   | (360)           |       |         | (360) |
| Public Health & Communities            | Communities                  | Income Generation   | External Funding for Events  | (30)            |       |         | (30)  |
| Public Health & Communities            | Communities                  | Efficiencies  | Review of Neighbourhood Centres  | (45)            |       |         | (45)  |
| Public Health & Communities            | Communities                  | Income Generation   | Introduce an E-Gym offer   | (63)            |       |         | (63)  |
| Public Health & Communities            | Communities                  | Income Generation   | Repurposing of Public Health grant to fund wellbeing posts   | (93)            |       |         | (93)  |
| Public Health & Communities            | Communities                  | Public Health Grant   | Grant funding to support services in addressing Public Health needs  | (500)           |       |         | (500) |

Appendix A

| Directorate       | Assistant Director       | Proposal Title  | Proposal Description  | 2023/24<br>£000 | Red  | Amber   | Green   |
|-------------------|--------------------------|---|---|-----------------|------|---------|---------|
| Place & Economy   | Growth & Regeneration    | Increase in Fees & Charges  | Increase in Fees & Charges  | (10)            |      |         | (10)    |
| Place & Economy   | Assets and Environment   | Additional income   | Garage Income   | (10)            | (10) |         |         |
| Place & Economy   | Assets and Environment   | Assets & Environment redesign   | Assets & Environment Service Improvement and Redesign   | (95)            |      | (95)    |         |
| Place & Economy   | Assets and Environment   | Grounds Maintenance   | Operational changes to grounds maintenance costs & services   | (57)            |      | (57)    |         |
| Place & Economy   | Assets and Environment   | Grounds Maintenance   | Purchase of equipment resulting in reduction in equipment hire charges  | (15)            |      | (15)    |         |
| Place & Economy   | Assets and Environment   | Grounds Maintenance   | Purchase of equipment resulting in reduction in equipment hire charges  | (30)            |      | (30)    |         |
| Place & Economy   | Assets and Environment   | Pay/Salaries  | Operational changes to cleaning services  | (14)            |      | (14)    |         |
| Place & Economy   | Assets and Environment   | Pay/Salaries  | Operational changes to Council Buildings.   | (31)            |      | (31)    |         |
| Place & Economy   | Assets and Environment   | Rental Income   | Additional income from rent reviews across the commercial portfolio.  | (80)            |      | (80)    |         |
| Place & Economy   | Assets and Environment   | Enterprise Centre Business Case - Full year effects of previous decisions | Increase in income based on appointed operators business case.  | (64)            |      | (64)    |         |
| Place & Economy   | Growth & Regeneration    | Climate Change  | Delivery of a range of climate change initiatives to reduce NNC's carbon footprint towards net zero                     | (250)           |      |         | (250)   |
| Place & Economy   | Highways & Waste         | Highways Contract   | Demobilisation costs for existing highways contract - reverses one-off pressure which was reflected in the 22/23 Budget | (201)           |      | (201)   |         |
| Place & Economy   | Highways & Waste         | Waste Management  | Disposal tonnage - HWRC Residual Waste  | (79)            |      | (79)    |         |
| Place & Economy   | Highways & Waste         | Waste Management  | Disposal tonnage - HWRC Wood Waste  | (27)            |      | (27)    |         |
| Place & Economy   | Highways & Waste         | Green Waste   | Harmonisation of Green Waste Charges  | (1,358)         |      |         | (1,358) |
| Place & Economy   | Highways & Waste         | Promote food waste  | Benefit of promoting the food waste service in the Corby and East Northants area  | (50)            |      | (50)    |         |
| Place & Economy   | Highways & Waste         | Refuse fees & charges   | Increase refuse & recycling fees & charges  | (135)           |      | (135)   |         |
| Place & Economy   | Highways & Waste         | Highways fees & charges   | Increase highways & transport fees and charges  | (44)            |      |         | (44)    |
| Place & Economy   | Highways & Waste         | Review Litter bin network   | Reduction in street cleaning costs  | (5)             |      |         | (5)     |
| Place & Economy   | Highways & Waste         | HWRC Income   | Increase income from HWRCs  | (153)           |      | (153)   |         |
| Place & Economy   | Regulatory Services      | Restructure   | Rationalisation of service provision  | (185)           |      | (30)    | (155)   |
| Place & Economy   | Regulatory Services      | Specialist Equipment For Service Delivery                                 | Base budget allocation for incident response released   | (280)           |      |         | (280)   |
| Place & Economy   | Regulatory Services      | Increase in Fees & Charges  | Increase in Fees & Charges  | (227)           |      | (227)   |         |
| Enabling Services | Finance & Performance    | Pensions  | Pension - Historical Pension Fund Deficit   | (232)           |      |         | (232)   |
| Enabling Services | Finance & Performance    | Pensions  | Reduction in Employer's Pension Contribution Rate   | (1,890)         |      | (1,890) |         |
| Enabling Services | Finance & Performance    | Pensions  | Disaggregation of Legacy Pensions   | (450)           |      |         | (450)   |
| Enabling Services | Finance & Performance    | Housing Benefit Subsidy   | Additional income relating to Housing Benefit Subsidy   | (5)             |      | (5)     |         |
| Enabling Services | Chief Executive's Office | Staffing  | Staff Savings   | (7)             |      |         | (7)     |

Appendix A

| Directorate       | Assistant Director        | Proposal Title   | Proposal Description  | 2023/24<br>£000 | Red          | Amber          | Green          |
|-------------------|---------------------------|--|---|-----------------|--------------|----------------|----------------|
| Enabling Services | Chief Executive's Office  | Communications   | Communications - Savings on professional services not utilised.                           | (3)             |              |                | (3)            |
| Enabling Services | Chief Information Officer | ICT Disaggregation   | Upfront work needed for ICT disaggregation - one-off, reversal of 2022/23 pressure        | (100)           |              |                | (100)          |
| Enabling Services | Chief Information Officer | ICT Contract Rationalisation   | Rationalisation of service contracts - largely mobile telephone contracts                 | (50)            |              |                | (50)           |
| Enabling Services | Chief Information Officer | ICT application rationalisation  | Rationalisation of service usage - largely Microsoft contract                             | (50)            |              |                | (50)           |
| Enabling Services | Human Resources           | Pay and Grading Review   | Delivery of Pay and Grading Review  | (120)           |              |                | (120)          |
| Enabling Services | Legal Services            | Fleet  | Changes to the operational arrangements for the mayor                                     | (19)            |              |                | (19)           |
| Enabling Services | Legal Services            | Legal Income   | Increase in Legal Income target   | (150)           |              |                | (150)          |
| Enabling Services | Legal Services            | Upper Tier Legal Services  | Anticipated saving from bringing upper tier legal services in house                       | (100)           |              |                | (100)          |
| Enabling Services | Customer Services         | Customer Services Replacement of Case Management System & Telephone System | Case management system and telephony replacement  | (106)           |              | (106)          |                |
| Enabling Services | Customer Services         | Uniforms   | Reduction in Staff Uniforms   | (8)             |              |                | (8)            |
| Enabling Services | Customer Services         | Staffing   | Transformation Staff Savings  | (106)           |              |                | (106)          |
| Corporate         | Corporate                 | Treasury Management  | Reversal of Covid Pressure from 2021/22 for £342k - based on interest recovery by 2023/24 | (342)           |              |                | (342)          |
| Corporate         | Corporate                 | Treasury Management  | Additional Income generated from higher than anticipated interest rates                   | (500)           |              |                | (500)          |
| Corporate         | Corporate                 | Treasury Management  | Reduced costs following the repayment of loans  | (109)           |              |                | (109)          |
|                   |                           |  | <b>Total</b>  | <b>(16,416)</b> | <b>(802)</b> | <b>(6,823)</b> | <b>(8,791)</b> |

This page is intentionally left blank