

Public Document Pack



Meeting: Council
Date: Thursday 7th December 2023
Time: 6:00 pm
Venue: Council Chamber, The Cube, George Street, Corby NN17 1QG

The meeting will be available for the public to view live at our Democratic Services' YouTube channel:

<https://www.youtube.com/@NNCDemServices>

Council Membership:


Councillor Barbara Jenney (Chair), Councillor Lora Lawman (Vice-Chair), Councillor Jean Addison, Councillor Tim Allebone, Councillor Valerie Anslow, Councillor Ross Armour, Councillor Charlie Best, Councillor Paul Bell, Councillor Matt Binley, Councillor Jennie Bone, Councillor David Brackenbury, Councillor Wendy Brackenbury, Councillor Cedwien Brown, Councillor Scott Brown, Councillor Leanne Buckingham, Councillor Lyn Buckingham, Councillor Lloyd Bunday, Councillor Jon-Paul Carr, Councillor Robin Carter, Cllr Melanie Coleman, Councillor William Colquhoun, Councillor John Currall, Councillor Alison Dalziel, Councillor Mark Dearing, Councillor Dez Dell, Councillor Scott Edwards, Councillor Jonathan Ekins, Councillor Emily Fedorowycz, Councillor Martin Griffiths, Councillor Jim Hakewill, Councillor Clive Hallam, Councillor Ken Harrington, Councillor Helen Harrison, Councillor Kirk Harrison, Councillor Larry Henson, Councillor Helen Howell, Councillor David Howes, Councillor Philip Irwin, Councillor Bert Jackson, Councillor Ian Jelley, Councillor Matt Keane, Councillor King Lawal, Councillor Graham Lawman, Councillor Anne Lee, Councillor Richard Levell, Councillor Paul Marks, Councillor Dorothy Maxwell, Councillor Peter McEwan, Councillor John McGhee, Councillor Zoe McGhee, Councillor Andy Mercer, Councillor Gill Mercer, Councillor Macaulay Nichol, Councillor Steven North, Councillor Jan O'Hara, Councillor Dr Anup Pandey, Councillor Tom Partridge-Underwood, Councillor Mark Pengelly, Councillor Harriet Pentland, Councillor Roger Powell, Councillor Elliot Keith Prentice, Councillor Simon Rielly, Councillor Russell Roberts, Councillor Mark Rowley, Councillor Geoff Shacklock, Councillor David Sims, Councillor Jason Smithers, Councillor Chris Smith-Haynes, Councillor Joseph John Smyth, Councillor Mike Tebbutt, Councillor Sarah Tubbs, Councillor Michael Tye, Councillor Malcolm Ward, Councillor Malcolm Waters, Councillor Kevin Watt, Councillor Keli Watts, Councillor Andrew Weatherill and Councillor Lee Wilkes.

Members of The Council are invited to attend the above meeting to consider the items of business listed on the agenda.

Agenda

Item	Subject	Page no.
01	<p>Apologies</p> <p>To receive any apologies for absence.</p>	
02	<p>Minutes of the meeting held on 26th October 2023</p> <p>The minutes of the Meeting of the Council held on 26th October 2023 to be approved as a correct record and signed by the Chair.</p>	7 - 32
03	<p>Declarations of Interest</p> <p>Members to declare any interest as appropriate in respect of items to be considered at the meeting.</p>	
04	<p>Chair's Announcements</p> <p>To receive any announcements from the Chair.</p>	
05	<p>Leader's Announcements</p> <p>To receive any announcements from the Leader of the Council.</p>	
06	<p>Public Participation</p> <p>(i) Public Statements</p> <p style="padding-left: 40px;">To consider public statements received in accordance with public meeting procedure rule 15.</p> <p>(ii) Public Questions</p> <p style="padding-left: 40px;">To consider public questions received in accordance with public meeting procedure rule 16.</p> <p>(iii) Petitions</p> <p style="padding-left: 40px;">To receive petitions qualifying for full Council in accordance with the council's petition scheme.</p>	
07	<p>Executive Presentations</p> <p>To receive any presentations from the Executive in accordance with meeting procedure rule 3.1 (vi).</p>	

Items requiring a decision		
08	<p>Selection and Appointment for Head of Paid Service/Chief Executive</p> <p>To recommend the appointment of a permanent Chief Executive for North Northamptonshire Council.</p>	33 - 44
09	<p>East Northamptonshire Local Plan Part 2</p> <p>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.</p>	45 - 450
10	<p>Local Council Tax Support Scheme 2024/25</p> <p>To update Council on the Local Council Tax Support Scheme for 2023/24 and seek Council endorsement for the proposed scheme for 2024/25.</p>	451 - 458
11	<p>Council Tax Base 2024/25</p> <p>To seek Council approval to set the Council Tax Base for 2024/25 as required by Section 33 of the Local Government Finance Act 1992, and in accordance with the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012.</p>	459 - 466
12	<p>Capital Budget Update 2023/24</p> <p>To seek Council approval for budget 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.</p>	467 - 472
13	<p>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</p> <p>To provide Council with an update on the progress of the 2022/23 Annual Review of the Service Delivery Contract (SDC).</p>	473 - 816
14	<p>Motions on Notice</p> <p>To consider motions received in accordance with Meeting Procedure Rule 18 as follows: -</p> <p><u>Motion 1</u></p> <p>To be proposed by Cllr Leanne Buckingham</p> <p><i>"That this Council affirms and upholds the longstanding twinning relationships that our sovereign twin towns have cultivated with</i></p>	

	<p><i>their counterparts in Europe. These partnerships have played a vital role in fostering cultural exchange, understanding, and cooperation between our communities.</i></p> <p><i>Recognising the mutual benefits derived from these twinning arrangements, this council takes responsibility for ensuring the continuity of these relationships. Our sovereign twin towns serve as ambassadors of goodwill, contributing to the rich tapestry of international connections that enhance the cultural and social fabric of North Northants.</i></p> <p><i>By reaffirming our commitment to the twinning relationships with European counterparts, we not only promote friendship and cooperation but also demonstrate our dedication to maintaining strong global ties in an ever-changing world.</i></p> <p><i>We will also preserve and nurture these valuable connections that have contributed positively to our community and beyond.</i></p> <p><i>Council asks that the member for culture, leisure and tourism looks at the formal arrangements that are required to devolve the twinning of the North Northamptonshire towns and villages to their parish and town councils, at the soonest possible opportunity.”</i></p>	
15	<p>Councillor Questions</p> <p>To receive questions from members in accordance with meeting procedure rule 17.</p>	
Urgent Items		
	<p>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.</p>	
16	<p>Close of Meeting</p>	
	<p>Adele Wylie, Monitoring Officer North Northamptonshire Council</p>  <p>Proper Officer Wednesday 29th November 2023</p>	

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Public Participation

The Council has approved procedures for you to present petitions or request to address meetings of the Council

ITEM	NARRATIVE	DEADLINE												
Members of the Public Questions	Questions may be submitted by members of the Public to meetings of the committee. The question must be in writing and submitted 2 clear working days prior to the meeting. No debate on questions or answers. A period of 15 minutes (Chair's Discretion) is allocated for Public Questions.	5:00 pm on Monday 4 th December 2023												
Members of the Public Agenda Statements	Members of the Public 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 of the Public has a maximum of 3 minutes to address the committee. A written copy of the statement must be submitted by the deadline indicated.	5:00 pm on Monday 4 th December 2023												
Members of the Public Petitions	<p>Anyone who lives, works or studies in North Northamptonshire may submit a petition to the Council. Depending on the size of your petition it will be responded to as follows: -</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Signatory Threshold</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Petition which triggers a debate</td> <td>1,500 +</td> <td>Any petition with 1,500 or more signatures will trigger a debate at a Full Authority meeting.</td> </tr> <tr> <td>Petition which calls an officer to account</td> <td>750 – 1,499</td> <td>Any petition with 750 – 1,499 signatures will summon a senior officer of the Authority to give evidence at a public Authority meeting.</td> </tr> <tr> <td>Standard Petition</td> <td>5 – 749</td> <td>Any petition with 5 – 749 signatures will be referred to a senior officer of the Authority to provide a response.</td> </tr> </tbody> </table>	Category	Signatory Threshold	Description	Petition which triggers a debate	1,500 +	Any petition with 1,500 or more signatures will trigger a debate at a Full Authority meeting.	Petition which calls an officer to account	750 – 1,499	Any petition with 750 – 1,499 signatures will summon a senior officer of the Authority to give evidence at a public Authority meeting.	Standard Petition	5 – 749	Any petition with 5 – 749 signatures will be referred to a senior officer of the Authority to provide a response.	
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Standard Petition	5 – 749	Any petition with 5 – 749 signatures will be referred to a senior officer of the Authority to provide a response.												

These procedures are included within the Council's Constitution. Please contact democraticservices@northnorthants.gov.uk for more information.

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

Press & Media Enquiries

Any press or media enquiries should be directed through Council's Communications Team to communications@northnorthants.gov.uk

Public Access and Enquiries

The public are welcome to attend the Council's meetings in person using the Council's public gallery. Public enquiries regarding the Council's meetings can be made to 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



Minutes of a meeting of the Council

Held at 6.00 pm on Thursday 26th October, 2023 in the Council Chamber, Corby Cube, George Street, NN17 1QG

Present:-

Members

Councillor Barbara Jenney (Chair)	Councillor Lora Lawman
Councillor Jean Addison	Councillor Bert Jackson
Councillor Tim Allebone	Councillor Ian Jelley
Councillor Ross Armour	Councillor Matt Keane
Councillor Charlie Best	Councillor King Lawal
Councillor Matt Binley	Councillor Graham Lawman
Councillor Jennie Bone	Councillor Anne Lee
Councillor David Brackenbury	Councillor Paul Marks
Councillor Wendy Brackenbury	Councillor Dorothy Maxwell
Councillor Scott Brown	Councillor Peter McEwan
Councillor Cedwien Brown	Councillor John McGhee
Councillor Leanne Buckingham	Councillor Zoe McGhee
Councillor Lyn Buckingham	Councillor Andy Mercer
Councillor Lloyd Bunday	Councillor Gill Mercer
Councillor Jon-Paul Carr	Councillor Macaulay Nichol
Councillor Robin Carter	Councillor Jan O'Hara
Councillor Melanie Coleman	Councillor Dr Anup Pandey
Councillor William Colquhoun	Councillor Tom Partridge-Underwood
Councillor Alison Dalziel	Councillor Harriet Pentland
Councillor Dez Dell	Councillor Roger Powell
Councillor Jonathan Ekins	Councillor Russell Roberts
Councillor Emily Fedorowycz	Councillor Mark Rowley
Councillor Martin Griffiths	Councillor Geoff Shacklock
Councillor Jim Hakewill	Councillor Jason Smithers
Councillor Clive Hallam	Councillor Joseph John Smyth
Councillor Ken Harrington	Councillor Michael Tye
Councillor Helen Harrison	Councillor Malcolm Ward
Councillor Larry Henson	Councillor Malcolm Waters
Councillor Helen Howell	Councillor Andrew Weatherill
Councillor David Howes	Councillor Keli Watts
Councillor Philip Irwin	Councillor Lee Wilkes

Officers

George Candler (Interim Chief Executive)
Adele Wylie (Interim Deputy Chief Executive and Monitoring Officer)
Ben Smith (Head of Democratic Services)

265 Apologies

Apologies for absence were received from Councillors Valerie Anslow, Paul Bell, Mark Dearing, Scott Edwards, Steven North, Mark Pengelly, Elliot Prentice, Simon Rielly, David Sims, Chris Smith-Haynes, Mike Tebbutt, Sarah Tubbs and Kevin Watt.

266 Minutes of the meeting held on 31st August 2023

The minutes of the meeting of the Council held on 31st August 2023 were approved as a correct record and signed by the Chair.

267 Declarations of interest.

The Chair asked those members who wished to do so to declare any interests in respect of items on the agenda.

The following interests were declared:-

Name of Councillor	Minute Number	Interest	Reason for Declaration
Cllr Dez Dell	275 Motion 2 (Alfred East Art Gallery)	Personal Interest	As a member of the Committee for the Friends of Kettering Art Gallery.
Cllr Paul Marks	275 Motion 2 (Alfred East Art Gallery)	Personal Interest	As a member of the Friends of Kettering Art Gallery and Museum.
Cllr Keli Watts	275 Motion 2 (Alfred East Art Gallery)	Personal Interest	As a member of the Friends of Kettering Art Gallery and Museum.

[During minute 275 Cllr Martin Griffiths also declared a personal interest, having been a board member of SEMLEP when the funding for Kettering Art Gallery was approved.]

268 Chair's Announcements

The Chair made the following announcements:-

Civic Engagements

Both the Chair and Vice-Chair had been busy in recent weeks including meeting with recipients of the Rose of the Shire Awards to present their rewards.

Northamptonshire Community Foundation

Rachel McGrath, Chief Executive of Northamptonshire Community Foundation was invited to provide a brief presentation to councillors.

The presentation set out the background to and the work undertaken by the Foundation, in that it was a charity giving back to the county by providing access to

funding for community based action to improve the lives of Northamptonshire's most disadvantaged people and communities.

The Chair thanked Rachel for a very informative presentation and hoped all councillors found the wide ranging opportunities that the Foundation provided was of interest.

Cllr Willie Latta

The Chair wished to express her condolences at hearing that Cllr Willie Latta, who was an alderman of Corby and served the Borough as a councillor for 26 years has passed away.

Cllr Keane added words of tribute, noting that he was a hard working and much respected councillor who was originally elected to Corby Borough Council in 1995. He had been mayor of Corby in 2002/03 and was made an alderman of Corby in March 2021.

Cllr Latta had been involved in town projects such as the town centre regeneration, establishment of the Cube, the swimming pool and Priors Hall. He had retired at the last election, had continued to be a mentor to councillors and was highly respected across Corby. He would be much missed.

269 Leader's Announcements

On behalf of the Conservative members of the Council, the Leader confirmed that all members of the community were treated equally and without bias. In June 2023, Councillor King Lawal had posted a tweet, following which the Council's Monitoring Officer had received complaints of breaches of the Council's Member Code of Conduct.

As leader of the Conservative Party, swift action was taken pending determination of the complaint. Following due process and the completion of the complaint process, he wished to invite Councillor Lawal to address Council.

Councillor Lawal addressed Council in the following terms:-

'On 29th June 2023 I posted a tweet which I understand some people were offended by. The tweet was an expression of my Christian faith by quoting passages from the bible. As a councillor I act equally for the residents of the areas in which I am elected in all areas of debate and discussion I represent all members of my constituency without fear or favour and undertake my role as a councillor with impartiality and without bias. My intent in posting the tweet was not to cause harassment, alarm or distress to any person or persons.

Thank you.'

270 Public Participation

The Chair noted that there were no public statements on this occasion.

The following member of the public asked a question to Council in accordance with meeting procedure rule 16.

Mr Chris Ashton – asked if the Council was prepared to administer a recall petition should this take place in Wellingborough constituency? If so, would the Council publish guidance on the rules and conduct of a recall petition to assist local electors.

Adele Wylie, Petitions Officer answered that following notification from the Speaker of the House of Commons, the Electoral Services team had put in place arrangements to deliver a recall petition. The Council was well prepared to administer urgent matters such as a recall petition. The Council's website would have information about the recall petition and how registered electors could sign the petition within the Wellingborough Constituency. In addition, registered electors would receive a Notice of Petition (like a Poll Card in an election) to ensure that they knew how and where to sign the petition should they wish to do so.

Mr Ashton asked the following supplementary question – What timeframe would be on receiving Notices of Petition?

Adele Wylie answered that they would be sent out on or around 3rd November 2023.

The Chair thanked Mr Ashton for asking his question and for the officer response.

271 Executive Presentations

The Leader confirmed that there were no Executive presentations to be made on this occasion.

272 Motion Presented to Council on 31 August 2023 - Conclusion of Debate

The Chair confirmed that councillors would now consider the conclusion of the debate on the Motion proposed by Cllr Valerie Anslow and seconded by Cllr Lyn Buckingham at the meeting of Council held on 31st August 2023, which had been adjourned following the reaching of the guillotine.

The proposed motion was as set out on the agenda for the meeting.

During debate a range of views were set out regarding housing in North Northamptonshire around the building and development of social housing and prevention of homelessness.

At the conclusion of debate, the motion was voted on, with 15 councillors voting in favour, three abstaining and 43 against.

The motion was duly **lost**.

Resolved:-

That Council rejects the proposed motion, as set out on the agenda for the meeting.

273 Northamptonshire Corporate Parenting Strategy Annual Report 2022/23

Consideration was given to a report which provided Council with an update on the Northamptonshire Corporate Parenting Board Annual Report for 2022-23. A copy of the report is filed with the agenda, marked as 'Agenda Item'.

The recommendations in the report were proposed by Cllr Wendy Brackenbury and seconded by Cllr Lora Lawman.

During debate, it was noted that this would be the last joint Corporate Parenting Board report for Northamptonshire, noting that both North and West Northamptonshire Councils had adopted their own Board for the 2023/24 municipal year onwards.

Following conclusion of the debate, the motion was voted on, with 57 councillors in favour, 3 abstaining and 1 against.

The motion was duly **approved**.

Resolved:-

That Council:

- i) Approves the content of the Northamptonshire Corporate Parenting Board Annual Report which gives an overview of the Corporate Parenting Board's activities.
- ii) Notes 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 Decisions:

- *To promote and monitor the Northamptonshire Children's Trust Corporate Parenting Strategy;*
- *In recognition of all Members and employees role as corporate parents;*
- *Following consideration of the overview of the work of Northamptonshire Children's Trust and in support of the discharge of 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 failed to deliver all or parts of its statutory responsibilities in this area.

274 Revenue Budget Update 2023/24

Consideration was given to a report requesting approval for the use of the Transformation Reserve to fund one-off revenue implementation costs of the Development and Regulatory Services Case Management Systems and the inclusion of ongoing annual revenue savings of the system into the Medium-Term Financial Plan (MTFP). A copy of the report is filed with the agenda for the meeting, marked as 'Item 10'.

The recommendations in the report were proposed by Cllr Lloyd Bunday and seconded by Cllr David Brackenbury.

During discussion it was noted that approval of the funding would allow the scheme to move forward to procurement and delivery.

Following conclusion of the debate, the motion was voted on, with 54 councillors in favour, 6 abstaining and 0 against.

The motion was duly **approved**.

Resolved:

That Council:

- a) Approves the funding for the following changes to the revenue budget:
- i) Development and Regulatory Case Management System (CMS) – approves a revenue budget of £600k in 2023/24 for the procurement and one-off implementation costs of a new CMS funded through use of the Transformation Reserve and approve the inclusion of ongoing revenue savings of £40.4k in 2024/25 onwards over the 5 years of the contract.

Reasons for Recommendations:-

- *Expiry of incumbent contracts by 31st March 2024;*
- *Benefits from a single CMS, service delivery improvements and process efficiencies.*

Alternative Options Considered:-

- *Do nothing.*
- *Do Minimal – replacement solution for Kettering.*
- *New supplier single solution.*

275 Motions on Notice

The Chair confirmed that there remained three motions on notice to be considered at this meeting, having been carried over from the 31st August 2023 meeting.

Motion 2 – Alfred East Art Gallery

Cllr Anne Lee moved and Cllr Keli Watts seconded the motion to Council, as set out on the agenda for the meeting.

In debating the motion and amendments all councillors were in favour of the Art Gallery being opened, however the timeframe for doing so and the implications for the rest of the premises were discussed in detail.

During the debate an amendment was moved by Cllr Helen Howell and seconded by Cllr Jon-Paul Carr to amend the motion in the following terms:-

“The Alfred East Art Gallery in Kettering has now been closed for two years for works to improve and maximise its potential. North **Northamptonshire** ~~Northants~~ Council **will**

~~continue to undertake~~ to keep councillors informed of progress made on repairing/replacing the roof of the art gallery building and the adjoining library roof. , and to request ~~Also it is requested~~ that the Executive ~~continue to~~ progress the project with a ~~the~~ view to ~~reopen the~~ open Cornerstone, and with it, the Alfred East Art Gallery by the summer of 2024 at the latest. ~~as soon as is practically possible.~~”

The amendment was voted upon with 46 councillors in favour, 1 abstaining and 13 against. The amendment was **carried**.

The substantive motion was then voted upon, with 59 councillors in favour, 1 abstaining and 1 against. The substantive motion was **carried**.

Resolved:-

That the following motion, as amended, be approved:-

“The Alfred East Art Gallery in Kettering has now been closed for two years for works to improve and maximise its potential. North Northamptonshire Council will continue to keep councillors informed of progress made on repairing/replacing the roof of the art gallery building and the adjoining library roof. Also, it is requested that the Executive continue to progress the project with the view to open Cornerstone, and with it, the Alfred East Art Gallery as soon as is practically possible.”

The Council adjourned for a period of 10 minutes

Following the re-commencement of the Council meeting, Cllr Jon-Paul Carr left the meeting for the duration of Motion 3 below.

Motion 3 – Library Service

Cllr Jim Hakewill moved and Cllr Charlie Best seconded the motion as set out on the agenda for the meeting.

The mover of the motion noted and supported the comments of the member of the public Chris Stanbra, who had spoken in favour of the motion via a public statement at the last meeting of the Council held on 31st August 2023.

During debate it was noted that completion of the handover of the last two libraries had been completed during the year (Raunds and Rothwell) to community management. It was also noted that at this time, 85% of the library service been disaggregated, with no intention to change or close any statutory or community managed libraries - which had service level agreements in place.

Following the debate the motion was then voted upon, with 17 councillors in favour, 1 abstaining and 40 against. The motion was duly **lost**.

Resolved:-

That Council rejects the proposed motion, as set out on the agenda for the meeting.

Motion 4 – River Nene

Cllr Emily Fedorowycz moved and Cllr Harriet Pentland seconded the motion as set out on the agenda for the meeting.

During debate, it was noted that this was a cross party motion and this was welcomed, noting the importance of waterways within North Northamptonshire. Councillors noted how important the River Nene was as an asset in terms of ecology and tourism, but expressed concern about the increases in rivers being polluted and conditions of sewerage infrastructure, seeking reassurances from the Environment Agency.

Following the debate the motion was then voted upon, with 60 councillors in favour, 0 abstaining and 0 against. The motion was duly **carried**.

Resolved:-

That Council approves the following motion:-

“The River Nene is one of NNC’s most important assets in terms of tourism and ecology and, as such, needs proper guardianship.

The Environment Agency has primary responsibility for the River Nene. NNC is one of many that has riparian responsibilities and also an important role in flood management.

This Council will:

Ask the Environment Agency to provide the current levels of pollution in the Nene River and North Northants waterways;

Continue to engage with the EA and Ofwat to understand what work is being undertaken in North Northamptonshire to protect waterways and consider options for ensuring the health of our waterways including, but not limited to, investigating Bathing Water Status for key leisure areas;

Continue to engage with the EA and Ofwat on the processes for feeding in reports of pollution incidents.”

276 Councillor Questions

The Chair noted that two questions had been carried over from the meeting of 31st August 2023 and a further nine submitted to this meeting.

All 11 questions were received and responded to, as well as supplementary questions and answers where requested.

A full copy of the questions and responses made, as well as any supplementary questions and responses, are filed with these minutes.

Prior to the conclusion of councillor questions, the Chair asked if members were in favour of completing the business of the agenda to a conclusion, should the guillotine be reached.

Having been moved and seconded, councillors voted in favour of the guillotine motion, by show of hands.

Chair

Date

The meeting closed at 8.56 pm

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Item 12 - Councillor Questions, Responses and Supplementaries – 31st August and 26 October 2023

Questions Carried over from 31st August 2023

No	Received from	Executive Member Responsible	Question	Answer
1.	Cllr Lyn Buckingham	Cllr Matt Binley	<p>In the past year how many reported fly tips have been removed by NNC out of all fly tips reported in the year, and at what overall cost to the council?</p> <p>Supplementary Question – At a time when every penny counts, could we collect the data on how much it is costing us in fly tipping?</p>	<p>In the period between July 2022 and June 2023 the council removed 3,008 incidents of fly tipping. The service is unable to provide an exact amount on how much this cost as the details are aggregated with other service and waste disposal activity, but it is estimated that the cost of addressing fly tipping for the same period is approximately £350,000.</p> <p>Supplementary Response – In the last period it cost approximately £350,000, so we do collect data, it just takes a while to articulate each year. The information is now also recorded centrally by Government (as of last year) and they are now refining that information. Having only this week had a meeting with the Parliamentary Under Secretary for Environmental Quality I know they are currently working on changing the data and how it is recorded and that this information will be available to compare amongst councils.</p>

No	Received from	Executive Member Responsible	Question	Answer
2.	Cllr Lyn Buckingham	Cllr Lloyd Bunday	What impact has the cost of living crisis had on the Council's ability to maximise its income collection?	<p>The Council's main area of income is derived through the collection of Council Tax and Business Rates. Together these amount c£286m (or 85%) of the funding that the Council needs to meet is net spending requirement of £336m in 2023/24. This excludes general fees and charges which are included with the net spend budgets for each of the service areas.</p> <p>The recent Revenues and Benefits Annual Performance Report 2022/23 submitted to the Corporate Scrutiny Committee in August set out the collection rate for Council Tax and Business Rates, noting that both had increased since the previous year. The latest performance report for 2023/24 also continues to show a strong in-year collection rate.</p> <p>The other main area of income for the Council's General Fund revenue budget, other than government grants, is fees and charges including rentals. These will include items such as client contributions for care provision, planning fees, lease income and leisure charges.</p> <p>The current monitoring of income budgets has shown that the position has remained relatively stable overall in the major areas of income collection. The Council, however, remains mindful of the prevailing economic climate and the potential effect on residents and</p>

businesses which may result in an adverse impact on income (including a slow-down in expected growth) and this risk is referenced in the monthly budget monitoring reports.

Areas to note within fees and charges are set out below.

Adult Social Care fees relate, in the main, to client contributions towards the package of care that is in place. The current monitoring indicates that this is forecast to be delivered on budget.

The Council has a significant investment estate, contributing over £13m each year to Council budgets. Whilst the income continues to meet budget needs, we are aware of tenants that are struggling due to increased costs, such as utilities, and some that have left their units due to challenging economic circumstance. Whilst it is important the Council uphold commercial contracts to meet its fiduciary and legal duties, we do work with tenants who are seeking support to continue their business where we can, through monthly rather than quarterly billing or payment plans.

Planning fee income in 2023/24 is currently projected to be approximately 3% lower than the previous year. Income in this area fluctuates from year to year and it is thought that the current predicted reduction in income is most likely the result of the impact of the

increased cost of borrowing. This will lead some businesses and residents to the conclusion that the current national economic climate is not the right time to invest in development.

Leisure income is performing well. In-house levels of membership are the highest they have ever been, but the other leisure operators are still working to get to pre-covid levels – there does seem to have been a shift in leisure members in these areas changing to pay as you go which may be a reflection of the cost of living and not wishing to commit to a Direct Debit. Similarly in Culture Tourism and Heritage, for example at Chester House, the income has held up over the last 12 months and seen an increase in line with business plan projections.

The Registrations Service has identified a concern over the lower number of weddings being booked this year. This may be a result of the cost-of-living crisis but could also be explained by the post lockdown backlog having been cleared in 2022/23. The service has introduced a smaller ceremony option (higher than statutory but more limited in guest numbers) to cater to those who may want to have a smaller wedding to try and keep costs down.

Separately, the Housing Revenue Account relies heavily upon rental income to support the provision of services in this area. The collection of rental income compared to budget can be influenced by an

individual's circumstances as well as changes in the assumed levels of right to buy properties and voids.

The service has seen an increase in rent arrears or tenants advising that they will need to claim benefit. To support tenants the housing income team is being more proactive in offering support. This includes assisting tenants to make applications for correct benefits, offering budgeting support and more flexibility in the ability to recover debt and assisting with debt management.

Income and expenditure plans completed with tenants have shown increases to costs such as food, utility bills and transport to work, so where previously tenants could cover larger payments to council related debts they are now having more difficulty. The Council is reviewing repayment schedules to ensure consistent payments can be achieved longer term, and to sustain tenancies and avoid evictions.

Questions to 26 October 2023

No.	Received from	Executive Member (or Officer) Responsible	Question	Answer
3.	Cllr Emily Fedorowycz	Cllr Harriet Pentland	<p>How much of the climate change budget has been spent to date, how much has been allocated to date, and how much has been spent on the three biggest projects?</p> <p>Supplementary Question – Can we be assured that this £1m will be spent by the end of the allotted period?</p>	<p>The Climate Change Investment Fund budget amounts to a total of £1m spread over a three-year period between 2022 – 2025. As £250k of this budget is allocated to 2024-25, £750k is the total budget up to the 31 March 2024. Expenditure against this budget is principally guided by the Council’s Carbon Management Plan, which was approved by Executive in December 2022 and to date, £425,255 of the fund has been allocated by the Climate Change Investment Fund Approval Panel.</p> <p>Three largest spends from the Fund to date are:</p> <ul style="list-style-type: none"> • £208k for Corporate Buildings Energy Surveys/Stock Condition Surveys as seed funding to enable application for Public Sector Decarbonisation Funding • £110k for the purchase of battery-operated equipment to replace fossil fuel powered items • £50k to fund a Residential Energy Efficiency Officer for Private Sector Housing <p>Supplementary Response – A large proportion of the money has already been allocated and I am pretty confident that we’re going to get through all of the money that we’ve allocated quite quickly and</p>

No.	Received from	Executive Member (or Officer) Responsible	Question	Answer
				we're pleased to be supporting them in the right ways.
4.	Cllr Emily Fedorowycz	Cllr Harriet Pentland	<p>Given the council's carbon management plan has been given a rating of 42% on its Climate Emergency Scorecard, what are the main actions being taken to improve this score?</p> <p>Supplementary Question – We have now been rescored and we are now at 22% even with our new Carbon Management Plan, so how are we confident that we're going to have successful implement of the Plan when we are falling behind on our actions. How are we going to rectify the situation and make sure we have a clear road map?</p>	<p>The rating referenced relates to an assessment of local authorities by Climate Emergency UK (CEUK) in 2021. This rating was the assessment made at that time for North Northamptonshire Council and was published in 2022. It is not a rating of the Council's Carbon Management Plan, which had not been produced at this time, but a range of measures determined by CEUK. Since this assessment the Council has produced and adopted a Carbon Management Plan and is confident that successful implementation of the actions outlined in the Plan should improve the rating and help deliver the target of being carbon neutral by 2030.</p> <p>Supplementary Response:- The Organisation changed the way in which Councils are scored so up and down the country, councils have seen their scores dramatically change from one year to the next. We are not unusual in that position. In terms of the work we are undertaking, we are not falling behind on the Carbon Management Plan, with regular updates to the EAP for Sustainable Communities and regular key performance indicators to the Executive and Corporate Scrutiny Committee that members can access. With regard</p>

No.	Received from	Executive Member (or Officer) Responsible	Question	Answer
				<p>to this particular scoring we don't know if it will change again, but we shall continue to work hard in delivering the Plan.</p>
<p>5.</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 24</p>	<p>Cllr Emily Fedorowycz</p>	<p>Cllr Jason Smithers</p>	<p>Since the change to the new member enquiry system, how many of the 170 enquiries have been resolved (meaning the problem has been actually solved)? Only 75 enquiries have been logged in the table outlining time to respond - does this mean 95 have not received a response?</p> <p>Supplementary Question – How long is this system going to be used? Is there a light at the end of the tunnel?</p>	<p>170 queries were received in September during the first month of the new system. At the end of the month 89 had become due for a reply of which 75 had been replied to and 14 were overdue at the time the data was compiled for reporting. As members will appreciate, the system is still bedding in, and I look forward to the number of overdue enquiries reducing. Members patience is appreciated, and feedback is always welcomed.</p> <p>Supplementary Response – This system will be used until there is another system available. It is currently bedding in and proving quite successful with the quantities of queries coming in via a centralised system. The system will be monitored and members' patience is appreciated as it beds down.</p>

No.	Received from	Executive Member (or Officer) Responsible	Question	Answer
6.	Cllr Matt Keane	Adele Wylie - Petitions Officer	<p>With the possibility of a recall petition being held in the Wellingborough constituency, will the council's electoral services be able to facilitate this if triggered and will the council devise a public awareness strategy of how to sign it?</p> <p>Supplementary Question – when will the Notices of Petition be issued?</p>	<p>Following notification from the Speaker of the House of Commons, the Electoral Services team has put in place arrangements to deliver a recall petition. The Council is well prepared to administer urgent matters such as a recall petition. The Council's website will have information about the recall petition and how registered electors can sign the petition within the Wellingborough Constituency. In addition, registered electors will receive a Notice of Petition (like a Poll Card in an election) to ensure that they know how and where to sign the petition should they wish to do so.</p> <p>Supplementary Response – They will be issued on or around the 3rd November 2023.</p>

No	Received from	Executive Member Responsible	Question	Answer
7.	Cllr Dez Dell	Cllr Lloyd Bunday	<p>For customer enquiries (to include, daily, weekly and monthly averages):-</p> <ul style="list-style-type: none"> a) When the 0300 126 3000 number is called, how quickly are calls answered across all auto attendant options? b) How many external calls (via the auto attendant) does each department receive? c) How often are callers transferred between departments? <p>Supplementary Question – Is there already login software in place with the new phone system or is this likely to be an additional expense that is to come later?</p>	<p>The new telephone system is still in its infancy, and we do not yet collect this data. Calls are spread between both Customer Services for some call options and services directly for others, so it is difficult to report how many calls are routed, received and answered by individual services. This also applies to transferring calls between individual services. We are reviewing what meaningful data can be provided to assist the services and Members better understand call volumes and Customer Services will also use call data to help ensure as many calls can be taken by all services as possible. We will be undertaking a member briefing in the coming months so that members are able to better understand our new system and the journey that we are on to improving customer experience.</p> <p>Supplementary Answer – It is part of the system that we have got. A new telephone system on its own won't solve all problems on its own. The Customer Management System that has also been put in will also help matters.</p>

No	Received from	Executive Member Responsible	Question	Answer
8.	Cllr Charlie Best	Cllr Matt Binley	<p>What is the status of the Parking consultation that was announced earlier this year and can I have a list of all car parks owned and controlled by NNC (as opposed to town councils or private companies)?</p>	<p>The results of the parking survey undertaken over the Summer, along with the usage surveys are being considered as part of drawing together a draft parking strategy. The draft parking strategy will be published for public consultation in the coming months, with engagement sessions with Councillors and Town and Parish Council’s undertaken.</p> <p>A list of car parks owned by NNC is available from the Councils Asset Management team and is also available on our website at:- https://www.northnorthants.gov.uk/car-parks-north-northamptonshire</p>
9.	Cllr Martin Griffiths	Cllr Jason Smithers	<p>Do the following local politicians and "public servants " have the leader's full and unequivocal support.</p> <ul style="list-style-type: none"> • MPs within the administrative area of the Council; • Senior officers of the PFCC and Northamptonshire constabulary; • Council leaders? 	<p>My role as leader of the Council does not require me to “support” the postholders of the mentioned roles. I do however work with a wide range of stakeholders to deliver for the people of North Northamptonshire.</p>

No	Received from	Executive Member Responsible	Question	Answer
10.	Cllr Jim Hakewill	Cllr Jason Smithers	How many councillors attended each of the training sessions during August, September and October including Equality, Diversity and Inclusion, Council Finances, Budget and Commercial Scrutiny and Planning including the urgent extraordinary one for Weekley Wood? Broken down between Executive and non-Executive members?	<p>Equality and Diversity Sessions (four duplicate sessions): 7 August - 15 non-Executive and one Executive; 15 August - 15 non-Executive; 16 August - Nine non-Executive; 19 September – Nine non-Executive.</p> <p>Scrutiny Training sessions – (for non-Executive members only, Executive members not requested to attend): 11 September - Essential & Effective Strategy for Scrutiny - Nine 11 September - Questioning & Listening – Eight 29 September – Chairing Skills for Chairs of Scrutiny - Attended by the five Scrutiny Committee Chairs/Vice-Chairs</p> <p>2 October - Council Finances, Budget and Commercial Scrutiny. - Five</p> <p>Planning Training, promoted to planning committee members: 21 September - 21 plus one Executive member; 22 September - 19 plus one Executive member.</p> <p>Investigations with planners have indicated that there has been no specific planning training on Weekley Wood.</p>

No	Received from	Executive Member Responsible	Question	Answer
			<p>Supplementary Question – In particular speaking about the diversity and inclusion training, why was it necessary to have four training sessions on the same subject when as part of all members’ inductions we had already had two equalities sessions in July 2021?</p>	<p>Supplementary Response:- On 7th August data there is a slight error in that 15 non-Executive and 4 Executive members attended. In answer to the supplementary, I don’t think you can have enough training. As a Council going forward we need to make sure that everybody is skilled in what they do and some people may choose to do training offline from the Council and some may choose to do Council training. The more training dates that go in the better.</p>
<p>Page 29</p>	<p>Cllr Jim Hakewill</p>	<p>Cllr Jason Smithers</p>	<p>When was the last time that each of the five Councils that created North Northamptonshire Council had an LGA Corporate Peer Challenge, listing the actual dates? What arrangements and dates are in place for NNC to welcome the scrutiny of an LGA Corporate Peer Challenge?</p>	<p>It has been identified that the following LGA Corporate Peer Challenges were undertaken prior to 1 April 2020 by the then sovereign councils within the current area of North Northamptonshire Council:-</p> <p>Corby Borough Council – 7-9 October 2014; East Northamptonshire Council – 12-14 March 2014</p> <p>No other Corporate Peer Challenges have been identified since the process commenced in 2011.</p> <p>It is recognised that LGA Peer Reviews can add much benefit to local authorities. The Leader and former Chief Executive met some months ago with the Local Government Association about an LGA Corporate Peer Challenge. Once a permanent Chief Executive is</p>

No	Received from	Executive Member Responsible	Question	Answer
Page 30			<p>Supplementary Question - In a Government publication, Lessons Learned referring to Northamptonshire County Council there is the following:-</p> <p>The Council declined offers of help from peers and was resistant to extensive efforts from sector membership bodies, especially the LGA to wake members up to the reality of their situation. Only at the last minute did the Council accept formal peer challenge from the LGA. Why after two years are we</p>	<p>appointed, they will consider when an appropriate time is for a Corporate Peer Review to take place.</p> <p>As an organisation that welcomes constructive external feedback, the Council has already had a Planning Advisory Service Review. As an extremely important front facing service for North Northamptonshire, it was prioritised for external review. The recommendations have been accepted and continue to be implemented.</p> <p>Supplementary Response – The former Chief Executive and I had had conversations with the LGA to get an LGA process in place. If you look at our peer review in planning with the LGA it was an absolute success. We will have an LGA Peer Review when the timing is right and we look forward to seeing some LGA experts coming in soon.</p>

No	Received from	Executive Member Responsible	Question	Answer
			going down the same route as the County Council?	

End of Cllr Questions

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Council 7th December 2023

Report Title	Selection and Appointment for Head of Paid Service/ Chief Executive
Report Author	Marie Devlin-Hogg, Assistant Director Human Resources - (On behalf of the Employment Committee and Appointments Sub-Committee) marie.devlin-hogg@northnorthants.gov.uk

Are there public sector equality duty implications?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information (whether in appendices or not)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972	Not applicable

List of Appendices

Appendix A – Job Description – Head of Paid Service/Chief Executive

1. Purpose of Report

- 1.1 The purpose of this report is to recommend the appointment of a permanent Chief Executive for North Northamptonshire Council.

2 Executive Summary

- 2.1 The previous Chief Executive left the Council on 4th June 2023, following which, the Executive Director of Place and Economy/Deputy Chief Executive, was appointed on an interim basis, pending the permanent recruitment to the role.
- 2.2 On the 17th of August 2023, the Employment Committee agreed to establish a Sub-Committee to undertake the recruitment and selection process for the role of Chief Executive and Head of Paid Service; and that the recruitment and selection approach would be comprehensive and inclusive, enabling key stakeholders to be part of the process.
- 2.3 The Sub-Committee provided advice to the Assistant Director of Human resources in respect of longlisting and shortlisting of candidates, and then convened on 22 November 2023 to undertake the final selection process and their recommendations are detailed in this report.

3 Recommendations

- 3.1 It is recommended that Council:
- 3.2 Approve the appointment of Adele Wylie to the positions of permanent Chief Executive, Head of Paid Service, Returning Officer and Electoral Registration Officer for North Northamptonshire Council; with an agreed start date of 27 January 2024.
- 3.3 That approval be given to appoint on a salary of £180,582, which is in accordance with the Council's agreed pay policy; plus returning officer/election fees, paid in accordance with the agreed legislative/local fees.

Reasons for Recommendations

- 3.4 These recommendations have been made following a comprehensive, inclusive and thorough recruitment and selection process, in accordance with the constitution, to ensure that the right candidate is selected to undertake the statutory designation of Head of Paid Service and the Chief Executive role at North Northamptonshire Council.

Alternative Options Considered

- 3.5 The role of Head of Paid Service/Chief Executive is critical for the Council and is a statutory appointment which is required to be filled.
- 3.6 The Council could decide not to permanently recruit to this role. However, the role is critical in leading the council forward to deliver the corporate priorities and ensure the best possible service and outcomes for our residents and communities.

4 Report Background

- 4.1 The Employment Committee met on 17th August 2023 and agreed to establish a Sub-Committee, with delegated authority to undertake the recruitment process to appoint a new permanent Chief Executive/Head of Paid service designation. The Committee also agreed to delegate authority to the Assistant Director of Human Resources, in consultation with members of the established Sub Committee, to longlist and shortlist suitably qualified applicants.
- 4.2 The Employment Sub-Committee comprised:
- Councillor Jason Smithers – Leader of the Council - (appointed as Chair of the Sub Committee)
 - Councillor Emily Fedorowycz - (Leader of the Green Alliance Group)
 - Councillor Helen Howell – Deputy Leader of the Council
 - Councillor Matt Keane - (Leader of the Labour Group)
 - Councillor Lora Lawman – (Member of the Conservative Group)
 - Councillor Russell Roberts - (Member of the Conservative Group)

- 4.3 A national recruitment campaign was launched in September 2023 for the permanent Chief Executive role and a recruitment partner (Penna) was appointed to attract and source the best talent in the market.
- 4.4 At the direction of the Employment Committee, the Assistant Director for Human Resources (HR), in consultation with members of the Employment Sub-Committee, developed and agreed an inclusive and holistic selection and interview process which involved a number of stages to test all elements of the role. These included a technical assessment stage, partner, member and employee stakeholder panels and a main appointment panel.
- 4.5 The Assistant Director HR received a total of fourteen applications at the beginning of October 2023. In consultation with members of the Employment Sub Committee, five candidates were longlisted on 17th October 2023. A technical assessment was undertaken shortly after by the Council's appointed recruitment partner and an experienced Chief Executive of another unitary authority, following which it was determined that all five longlisted candidates would be shortlisted for the next stages.
- 4.6 Assessment and interviews took place over a two-day period; with the first day (Tuesday, 21st November 2023) involving six stakeholder panels – the Member Panel (comprising representation from all recognised political groups, excluding those on the Employment Sub Committee); Corporate Leadership Team Panel, Partners Panel, Leadership Panel (senior leaders and Assistant Directors) from all directorates), Children and Young People Panel and Employee & Trade Union Panel. The candidates completed presentations, created and delivered engagement sessions and answered questions during these Panels.
- 4.7 The Sub Committee received a briefing on best practice recruitment and selection protocols prior to the interviews, including equality and diversity considerations and awareness of unconscious bias.
- 4.8 The final interviews, undertaken by the Sub Committee, were held on Wednesday, 22nd November 2023. The Assistant Director of Human Resources and the Managing Director of the Council's chosen executive search partner Penna were also present.

5 Issues and Choices

- 5.1 The conclusion of the Sub Committee was to recommend the appointment of Adele Wylie as North Northamptonshire's permanent Chief Executive and designated Head of Paid Service.
- 5.2 Adele is currently Executive Director for Customer and Governance and Monitoring Officer at North Northamptonshire Council. She is also the interim Deputy Chief Executive.
- 5.3 Adele brings a wealth of leadership experience and has a strong track record in driving excellence in public service delivery. Her career in local government

includes her current role, successfully leading HR, Customer Services, Legal and Democratic services. Prior to this, she held the positions of Director of Governance and Regulatory Services at Melton Borough Council with responsibilities including environmental health, licensing and enforcement and Head of Service at Rutland County Council where she led both in-house services and delivered financial and operational efficiencies in outsourced services. Adele has a strong passion and a clear vision for continuing to build an ambitious, modern council with residents at its heart and shaping the place agenda with communities and partners.

- 5.4 Should Full Council agree this recommendation, Adele will start in the role on 27 January 2024. The role was advertised at a salary between £174,475 - £184,625 (with a national pay award pending). The chief executive national pay award was recently agreed (3.5%) and therefore the revised salary scale is £180,582 - £191,087 to reflect this uplift. The salary offer will be made at the bottom of the salary range, in accordance with the agreed NNC Pay Policy.
- 5.5 The Council could decide not to permanently recruit to this role. However, the role is critical in driving and leading the council's future vision and roadmap to ensure the best possible services and outcomes for our residents and communities.
- 5.6 The Monitoring Officer is also a statutory appointment pursuant to section 5 of the Local Government and Housing Act 1989 and is accountable to the Council. It is an appointment of Council and is currently held by Adele Wylie in her current post as Executive Director of Customer and Governance. Legislation prohibits the Head of Paid Service also being the Monitoring Officer and therefore a designation to another person is required, should Adele be appointed as Head of Paid Service. Pending approval, discussions will be commence regarding the interim and permanent Monitoring Officer designation, which will need to be approved by Council at a future meeting.

6 Next Steps

- 6.1 If approved, and subject to the satisfactory employment checks, the appointment will be made.

7 Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 Resources were required in terms of a time commitment from members and officers to participate in the long/short listing meetings and the interview panels.
- 7.1.2 The search and selection fee for the preferred search partner, Penna, was £14,950.
- 7.1.3 There are no additional financial implications arising from the proposal to appoint the Sub Committee.

7.2 Legal and Governance

7.2.1 The Council must ensure that the appointment of statutory roles is managed in accordance with the Constitution. The recommendations proposed in this report will ensure that the correct process is followed.

7.2.2 In accordance with the Local Authorities (Standing Orders)(England) Regulations 2001 (and as referenced in section 4 of Part 9.5 – Officer Employment Procedure Rules of the Constitution, an offer of appointment in relation to the relevant chief officer/s, may not be made until members of the Executive have been notified of the proposed appointment and within a required period of time, no material or well-founded objection has been received by the Proper Officer.

7.2.3 The appointment of the Head of Paid Service is reserved to Council.

7.3 Relevant Policies and Plans

7.3.1 The appointment to Head of Paid Service/Chief Executive will support the Council's Corporate Plan 2021 – 2025, the continued transformation agenda and other key strategies and plans that deliver the best outcomes for our residents.

7.4 Risk

7.4.1 A comprehensive and robust recruitment process has been conducted/undertaken to ensure that the most suitable candidate has been recommended for this appointment.

7.4.2 There are no further risks to consider arising from the proposed recommendations in this report.

7.5 Consultation

7.5.1 None required, although a range of stakeholder panels participated in the recruitment exercise, as detailed in 4.6 above.

7.6 Equality Implications

7.6.1 The appointment process followed a fair and transparent process in accordance with the Equality Act 2010 and the Council's Equality, Diversity and Inclusion Policy and its Equality Strategy 2021- 2025. Eligible candidates were invited to apply to a national and open recruitment campaign.

7.7 Climate Impact

7.7.1 There are no specific climate impacts arising from this report.

7.8 Community Impact

7.8.1 There are no specific community impacts arising from this report.

7.9 Crime and Disorder Impact

7.9.1 There are no specific crime and disorder implications arising from this report.

8 Background Papers

8.1 Constitution of North Northamptonshire Council ([link to website](#))



North Northamptonshire Council

Role Profile

Chief Executive

Salary: £174,475 - £184, 625 (Pay award pending) plus returning officer/election fees

Responsible to: Leader of the Council

Job Purpose:

- Fulfil the role of Chief Executive and the statutory designation of Head of Paid Service, working with Council Members and the Senior Management Team to provide leadership, vision and strategic direction for the Council.
- Achieve the strategic aims and objectives of the Council, ensuring value for money and high- quality services in accordance with statutory requirements and sound financial principles.
- Develop and drive the organisational culture to achieve the Council's vision, priorities and strategy.
- Establish and develop successful internal and external relationships and partnerships, as a proactive and positive ambassador for the Council and North Northamptonshire at regional and national levels.
- Act or nominate as Returning Officer.

Main Duties and Responsibilities:

Strategic Leadership & Management

- Ensure the delivery of high-quality services to the residents of North Northamptonshire.
- Fulfil the role of Chief Executive and statutory designation of Head of Paid Service, providing clear personal leadership and strategic direction to secure a cohesive and co-ordinated approach to deliver and improve organisation-wide service provision, resource allocation and prioritisation.
- Work with elected members to ensure effective governance of the Council and its' legality, probity, integrity, proper public accountability and scrutiny of decision-making processes.

- Provide visible and inspirational leadership, acting as a role model for a high-performance and supportive culture that enables employees to focus on outcomes for our residents and achieve their potential.
- Develop and drive transformational change, fostering and leading a culture of continuous improvement that reflects the values of the Council and encourages creativity and commercial acumen within a public service ethos.
- Jointly manage the direction and performance of the Northamptonshire Children's Trust, ensuring the delivery of high-quality services to children, young people and families across the county.
- Support the Council's elected leadership in creating and implementing strategies to enable the Council to deliver its vision and objectives.
- Act as the Council's principal policy adviser on matters of strategic and general policy.
- Ensure that the Council meets its statutory obligations, including those relating to health and safety, data protection and equalities – promoting a culture of diversity, fairness and respect.

Transformation and Shaping

- Lead the transformation of the Council; including the integration, digitalisation and commercialisation as appropriate of services and shaping of functions to achieve the best outcomes for the residents of North Northamptonshire.
- Shape a modern and innovative culture and approach in how the Council delivers its critical services and develops its employees
- Establish a strong, financial foundation and position and develop plans for future financial stability and sustainability.

Political Interface and Member Relations

- Develop and maintain effective working relationships with elected Members, working with Members to foster a positive and productive interface between Members and officers across the Council.
- Work with, advise and support elected Members in formulating appropriate strategies and plans to deliver political objectives and modern, effective services.
- Promote a culture of political awareness amongst officers to help translate political will into appropriate future strategies and delivery of objectives.

Leading Partnerships, Collaboration & Managing Reputation

- Play a leading role in the local community; bringing together private, public and voluntary partners to help direct and realise better outcomes for residents.
- Represent the Council and its interests through personal influence and engagement in partnerships at all levels within the public, private and voluntary sectors, acting as an ambassador for the Council at all times.

- Influence a range of policy makers, public bodies, partners and suppliers to ensure the Council is well positioned to meet existing objectives and new challenges.
- Lead and protect the reputation of the Council, overseeing a communications strategy that promotes understanding and a positive image of the Council to internal and external stakeholders and partners.
- Provide personal leadership and direction to ensure the Council engages and connects with the local community; to develop understanding, shape services, build community resilience and drive customer satisfaction.

Other Responsibilities

- Carry out or have undertaken the role of Electoral Registration Officer and Returning Officer for local and national elections. (This responsibility could potentially rest with a different officer).
- Fulfil statutory responsibilities relating to emergency planning.
- Undertake any other duties commensurate with the role.

The position is politically restricted.

North Northamptonshire Council

Person Specification

Chief Executive

Qualifications

- Relevant degree or equivalent professional qualification or experience.
- Evidence of continuing managerial, professional and relevant personal development.

Experience

- A proven track record of achievement at Chief Executive or senior strategic management level in a relevant organisation.
- Demonstrable experience and success in:
 - Delivering outcomes through transforming services that improve services and customer feedback.
 - Promoting, leading and managing transformation programmes in large, complex organisations that involving cultural and structural change.

- Managing a diverse range of services and translating best practice and organisational ambition/vision into tangible outcomes, achievements and service delivery improvements.
- Driving cultural change and organisational vision and values.
- Effective partnership working, networking and collaboration; developing and maintaining positive and productive relationships with a range of internal and external stakeholders and strategic partners.
- Leading and motivating senior, professional colleagues to ensure high levels of achievement and performance.
- Managing significant budgets, diverse services, capital programmes and complex projects within agreed resources and procedures.
- Providing professional advice to and building effective working relationships with senior managers and elected Members.
- Commitment to equality of opportunity, diversity and inclusivity in relation to service delivery and employment.
- Building, promoting and maintaining an organisation's reputation.

Skills and Knowledge

- Detailed knowledge of the statutory, policy and strategic framework in which local government operates.
- Thorough understanding of the current issues and future challenges facing the sector and their impact across a range of local government services.
- Proven leadership ability, with evidence of developing and embedding vision, setting direction, inspiring confidence, influencing and motivating others.
- Effective interpersonal and communication skills, to engage a range of audiences within and outside the organisation and to positively represent the Council.
- Strong influencing and negotiating skills.
- Highly developed analytical and problem-solving skills, with the ability to work strategically and conceptually and apply sound judgement when evaluating options.
- Political astuteness, with the ability to work successfully within a political environment through effective working relationships with Elected Members.
- Ability to plan and implement strategies and programmes.
- Commercially / financially astute and customer focussed.

Personal Qualities

- Passionate about putting residents at the heart of service delivery.
- Positive role model for behaviours and culture.
- Collaborative and strategic leader, able to motivate and work across boundaries and achieve performance/results through others.
- Robust and resilient, with drive and self-motivation.
- Innovative and forward looking.

- Flexible to meet competing demands and challenging circumstances.
- Personality and credibility that engages and gains the confidence of all stakeholders.
- Personal integrity, with a personal commitment to equality, diversity and inclusivity.

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COUNCIL 7th December 2023

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

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

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 and subsequently seeks the Council’s agreement to adopt the Plan, 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 31st 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, Council is requested to consider supporting the Plan, as revised through the Main Modifications schedule and the Council's Additional Modifications.

3. Recommendations

- 3.1 It is recommended that Council:
- a. Supports the content of the Part 2 Local Plan, (as set out in **Appendix A**) to provide for its adoption;
 - b. Delegates authority to the Executive Member for Growth and Regeneration, in consultation with the Assistant Director for Growth and Regeneration, to
 - i) 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;
 - ii) 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 27th 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 31st 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 6th April and 5th 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 14th December 2022 and then published for public consultation from 10th March to 21st 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 31st 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:

- adopt the East Northamptonshire Local Plan Part 2 incorporating the recommended modifications; or
- 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. Council is therefore recommended to support the submission of the Plan for adoption 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 Council resolve to adopt the Local Plan, as recommended in this report, the polices 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

7.5.1 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.

7.5 Consideration by the Executive

7.6.1 This report was considered by the Executive at the meeting held on 16 November 2023, where it was resolved to agree the recommendations as they were set out in the report.

7.6 Consideration by Scrutiny

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

7.7 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.

7.8 Climate Impact

7.8.1 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.

7.9 Community Impact

7.9.1 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.

7.10 Crime and Disorder Implications

7.10.1 The Local Plan considers aspects of crime and disorder, particularly through design and placemaking, amplifying polices 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

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- EN26: Housing mix and tenure to meet local need
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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)¹, 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

¹ <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 2004²) 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 amended³, 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.

² <https://www.legislation.gov.uk/ukpga/2004/5/contents>

³ <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 Plan⁴ (adopted 1996) and the Rural North, Oundle and Thrapston Plan⁵ (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

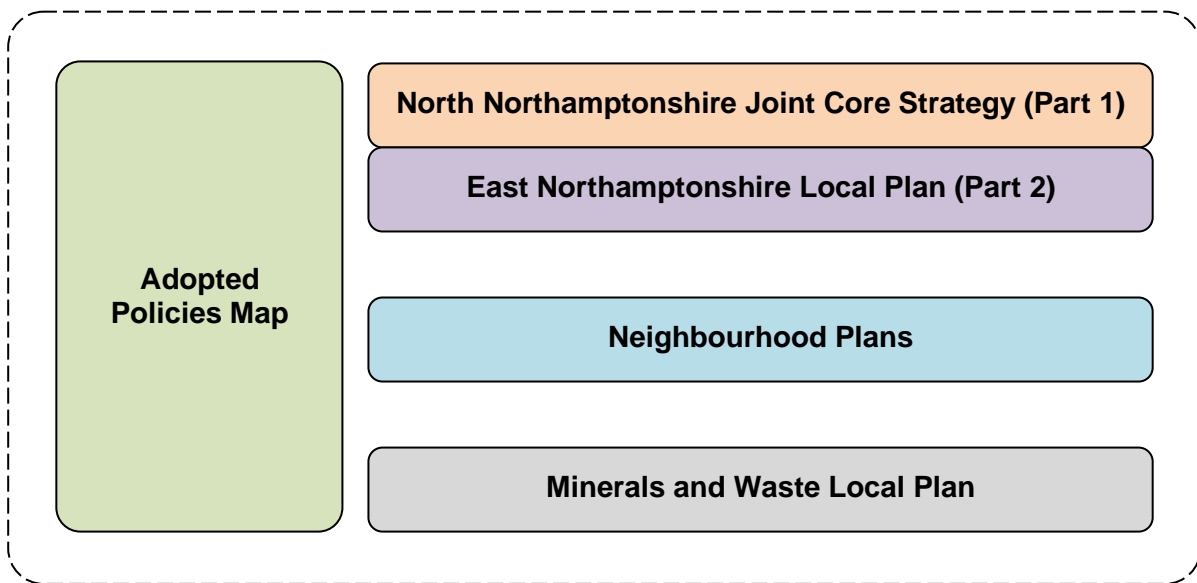
⁴ https://www.east-northamptonshire.gov.uk/info/200197/1996_district_local_plan/1676/1996_district_local_plan

⁵ <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 2011⁶ 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 making⁷.

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

⁶ <https://www.legislation.gov.uk/ukpga/2011/20/contents>

⁷ 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. 1552⁸). 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

⁸ <http://www.legislation.gov.uk/ukxi/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 1st 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
- 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 2017⁹.
- 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 2020¹⁰ and the Infrastructure Delivery Plan (IDP), September

⁹ <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>

¹⁰ https://www.east-northamptonshire.gov.uk/info/200190/annual_monitoring_report/68/evidence_base_and_monitoring/9

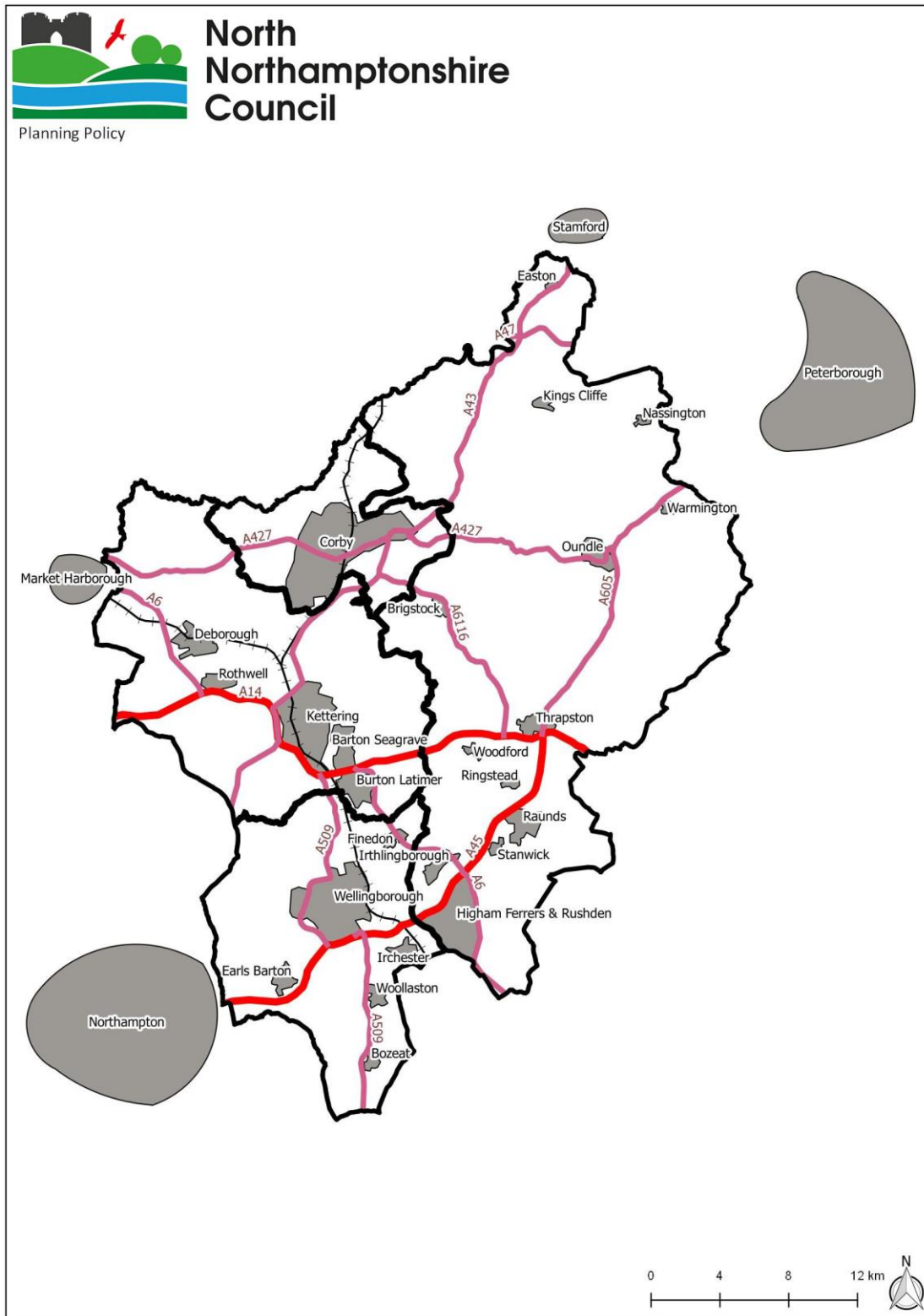
2017¹¹. The SFRA provides an overarching District-level assessment of published (secondary) flood data to establish whether new development can be allocated outside high and medium flood risk areas. The IDP guides the development of new infrastructure to support new developments, both community (e.g. 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 2021¹². 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 2nd 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.

¹¹ <http://www.nnjpu.org.uk/publications/north-northamptonshire-infrastructure-delivery-plan/>

¹² 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 1633¹³) and requires consideration of “all reasonable alternatives”. The Council’s consultants AECOM undertook the Sustainability Appraisal¹⁴ 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 Guidance¹⁵; e.g. Historic England¹⁶.
- 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 2017¹⁷. 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

¹³ <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

¹⁴ https://www.east-northamptonshire.gov.uk/downloads/file/12096/sustainability_appraisal_report

¹⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

¹⁶ <https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>

¹⁷ <https://www.legislation.gov.uk/ukxi/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 Screening¹⁸, 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 toolkit¹⁹, which has been utilised to prepare the HIA for this Plan.

¹⁸ https://www.east-northamptonshire.gov.uk/downloads/file/12089/equalities_impact_assessment

¹⁹ <http://www.nnj pdu.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 Guide²⁰, 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 Assessment²¹ 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 AMR²² 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.

²⁰ <https://www.gov.uk/guidance/viability>

²¹ https://www.east-northamptonshire.gov.uk/downloads/file/11982/east_northamptonshire_local_plan_viability_assessment_bnp_paribas_july_2020

²² <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%
TOTAL	57,443	66,505	69,151	11,708	20.4%

- 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 19th 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 19th and early 20th 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 20th 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 20th 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 18th century to being fully established and a prominent aspect of the town's economy by the late 19th 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 8th century, which was later replaced by the current St Peter's Church. The town underwent significant growth in the 11th and 12th 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 19th 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 19th/ early 20th centuries. Other important features to the east of the Nene Valley include Barnwell Castle, first built in the 12th 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 11th century, a role which continued until the 19th 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 vision²³ 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 20th 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

²³ <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

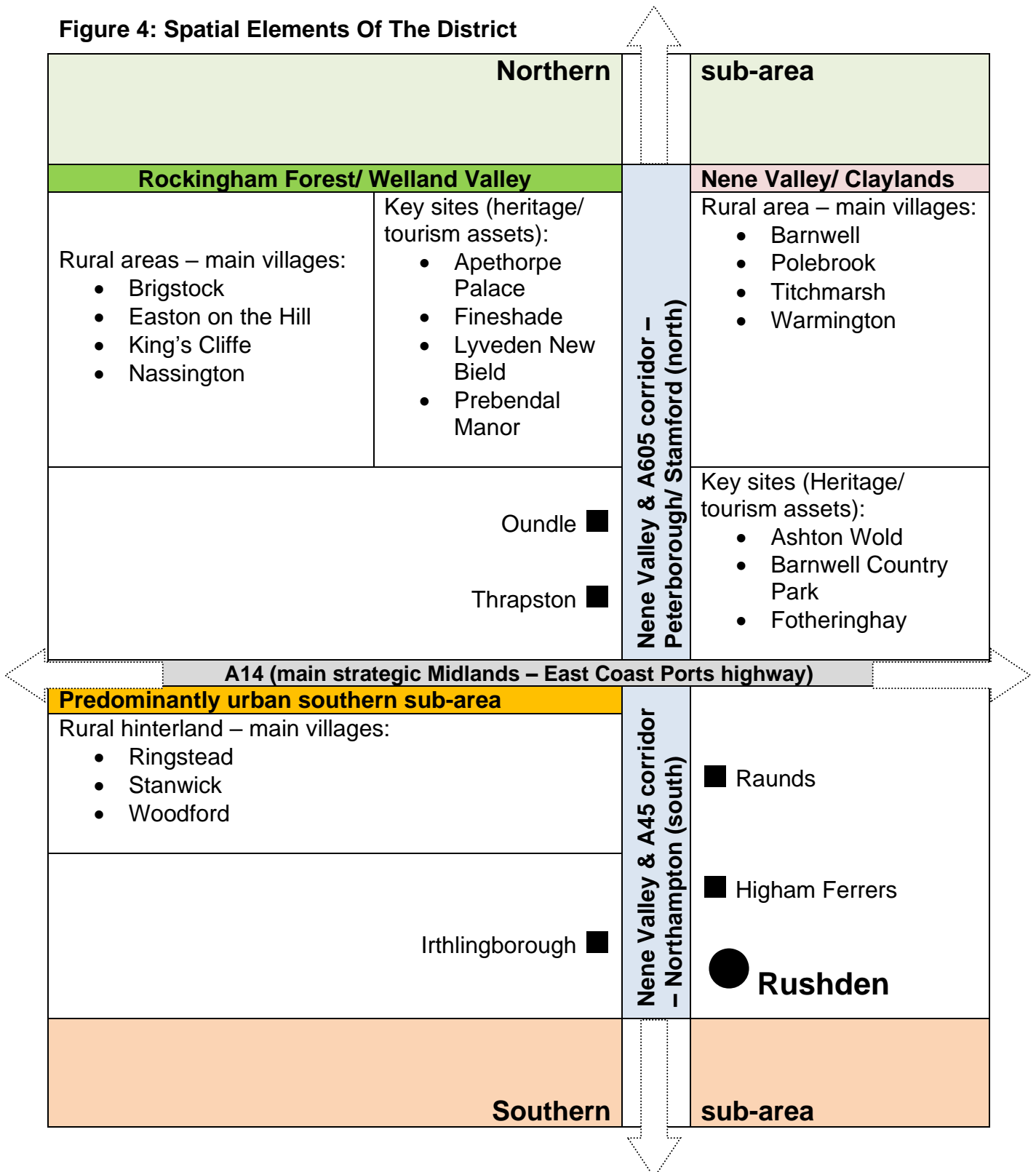
- 3.4 The Joint Core Strategy defines an overarching Vision, for the whole of the North Northamptonshire area. It also sets out an East Northamptonshire specific Vision.

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.

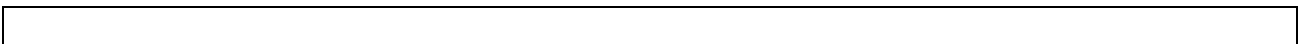
- 3.5 The Plan will aim to identify those aspects of the Joint Core Strategy Vision that should be developed further, and to develop the spatial elements of this vision. This should recognise the diverse aspects of the Plan area, with particular reference to the northern

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>1. Empowered and proactive communities 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"> • Good quality of life – sustainable, clean, healthy, safe • Effective partnership working • Knowledge of our customers and communities

<p>2. Adaptability to future climate change 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"> • Good quality of life – sustainable, clean, healthy • Effective partnership working • Effective management
<p>3. Distinctive environments that enhance and respect local character and enhance biodiversity 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"> • Good quality of life – sustainable, clean, healthy • Effective partnership working
<p>4. Excellent services and facilities easily accessed by local communities and businesses 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"> • Good quality of life – prosperous, sustainable, clean, healthy, safe • Effective partnership working • Effective management • Knowledge of our customers and communities
<p>5. A sustainable balance between local jobs and workers and a more diverse economy 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"> • Good quality of life – prosperous, sustainable • Effective partnership working • Effective management
<p>6. Transformed connectivity 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"> • Good quality of life – prosperous, sustainable • Effective partnership working
<p>7. More walkable places and an excellent choice of ways to travel 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"> • Good quality of life – sustainable, healthy • Effective partnership working

<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>8. Vibrant, well connected towns and a productive countryside 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"> • Good quality of life – prosperous, sustainable • Effective partnership working
<p>9. Stronger, more self-reliant towns with thriving centres 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"> • Good quality of life – prosperous, sustainable • Effective partnership working
<p>10. Enhanced quality of life for all residents 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"> • Good quality of life – sustainable, clean, healthy, safe • Effective partnership working • Effective management • Knowledge of our customers and communities

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.

Category	Location	Role
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. 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%
TOTAL		7,580	100.0%

- 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)²⁴, with more detailed analysis set out in the Rural Settlement Hierarchy Technical Paper²⁵. 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).

²⁴ https://www.east-northamptonshire.gov.uk/downloads/file/12120/background_paper_1_-_settlement_hierarchy

²⁵ https://www.east-northamptonshire.gov.uk/downloads/download/5048/technical_paper_rural_settlement_hierarchy_january_2021

Table 4: Functional roles for rural settlements		
Category/ settlement	Roles include:	Generic characteristics
Large freestanding villages: <ul style="list-style-type: none"> • Brigstock • Easton on the Hill • King's Cliffe • Nassington • Ringstead • Stanwick • Warmington • Woodford 	<ul style="list-style-type: none"> • Focal points for community infrastructure and services within the locality; • Local services and facilities may serve a cluster or network of rural settlements; • Emphasis upon development to meet locally occurring needs. 	<ul style="list-style-type: none"> • Population >1000; • Local services and facilities – primary school, pub, Post Office, convenience retailer; • Defined by rural Parish, but serving a localised network of rural villages.
Small freestanding villages: <ul style="list-style-type: none"> • Most villages (Listed in Table 5) 	<ul style="list-style-type: none"> • Limited community infrastructure and facilities; • Emphasis upon smaller scale locally significant development opportunities where these are necessary to fulfil a defined local need. 	<ul style="list-style-type: none"> • Population <1000; • Limited local services and facilities – 1-2 local services e.g. primary school, pub etc • Generally defined by rural Parish, with a Church of England Parish Church.
Urban outliers: <ul style="list-style-type: none"> • Crow Hill (Irthlingborough) • Elmington/ Laxton Drive (Oundle) • Avenue Road/ Bedford Road/ Newton Road (Rushden) 	<ul style="list-style-type: none"> • Limited community infrastructure and facilities; • Specific character areas – emphasis upon small scale managed infill development within the existing built form. 	<ul style="list-style-type: none"> • Urban/ suburban character; • Development management in accordance with an appropriate bespoke criteria-based policy; • May be regarded as part of a larger/ main urban area, or functional communities in their own right.
Restraint villages/ rural outliers (Open Countryside): <ul style="list-style-type: none"> • Armston • Ashton • Wigsthorpe • Wakerley • Various other groups of outlying buildings, or hamlets 	<ul style="list-style-type: none"> • Few/ no community infrastructure and facilities; • Small groups of properties serving 1-2 rural businesses. 	<ul style="list-style-type: none"> • Clusters of rural properties in open countryside locations, or special historic conservation interest (Ashton); • Close functional relationship to a larger village (Wakerley); • Development management in accordance with Open Countryside policies; or • Are normally regarded as part of a wider network of rural communities, rather than freestanding settlements.

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)

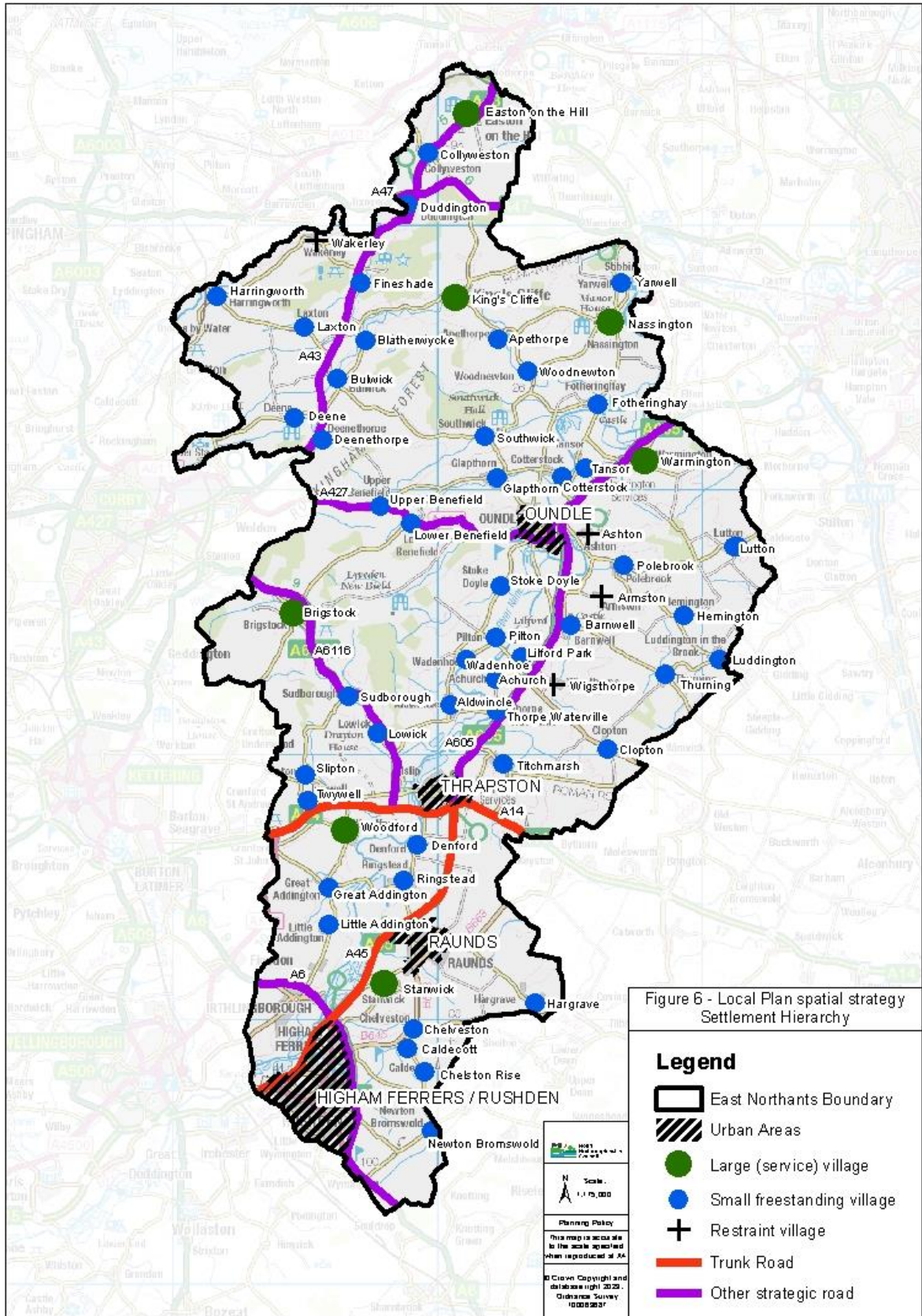
- 4.20 **Crow Hill** – Crow Hill has a predominantly urban/ suburban character. As such this area is regarded as “urban”, for the purposes of applying the spatial development strategy. It is part of the main urban area and is therefore covered by Policy EN1(1) (below) and Policy 11(1) of the Joint Core 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).

Table 5: Defined villages		
Large freestanding (service) villages		
Brigstock	Nassington	Warmington
Easton on the Hill	Ringstead	Woodford
King's Cliffe	Stanwick	
Small freestanding (other) villages		
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
Restraint villages		
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 ²⁶ development opportunities may be supported where it can be demonstrated that they are necessary to fulfil a defined local need ²⁷ 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

²⁶ 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.

²⁷ 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)²⁸, 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).²⁹

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 boundary³⁰, 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.

²⁸ https://www.east-northamptonshire.gov.uk/downloads/file/12103/background_paper_2_-_settlement_boundaries

²⁹ https://www.east-northamptonshire.gov.uk/meetings/meeting/760/planning_policy_committee

³⁰ 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)³¹. 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;

³¹ <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 2015³²), 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

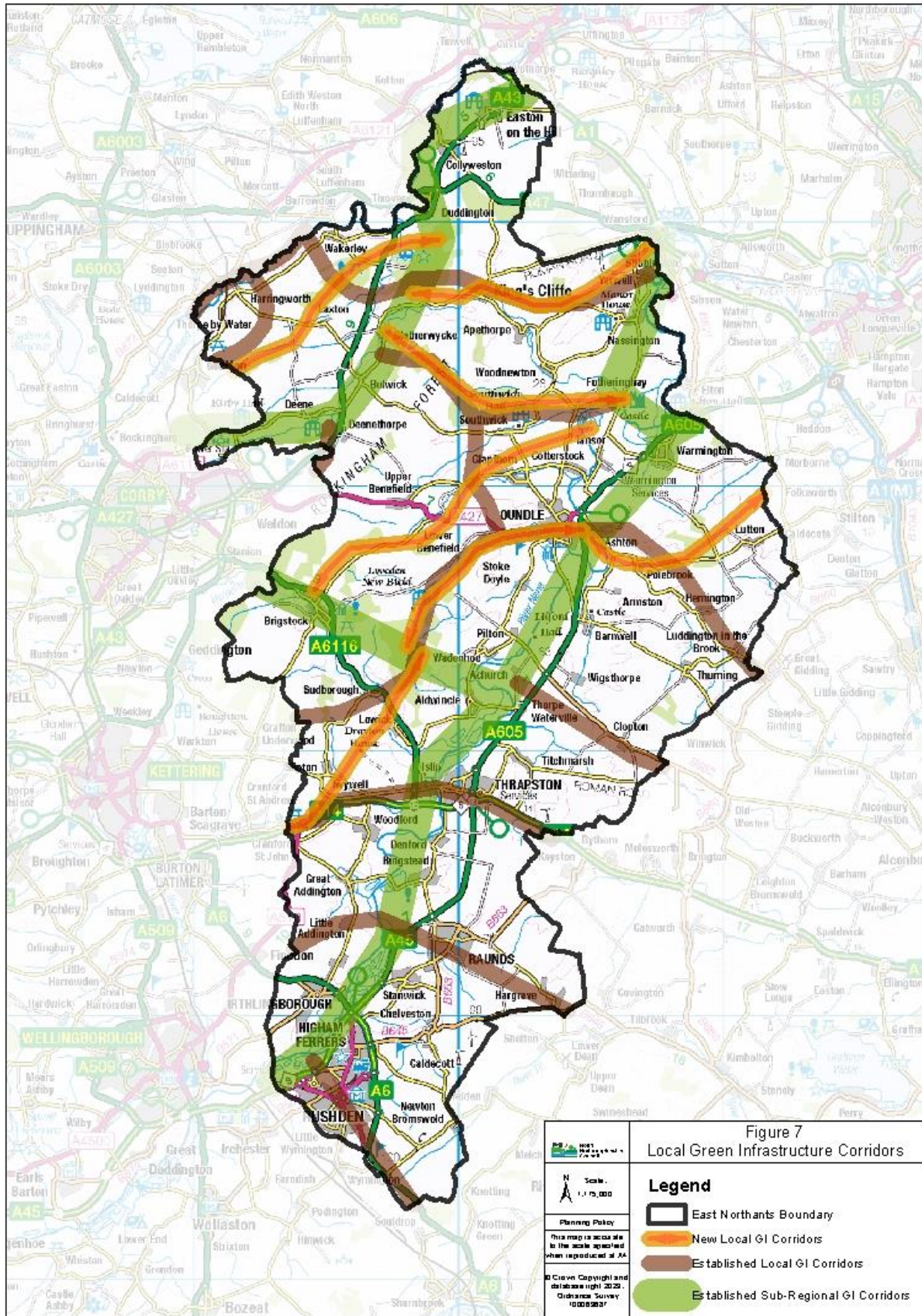
³² <https://www.oundle.gov.uk/uploads/oundle-cycle-network-study---sustrans---draft-2.pdf>

affect the viability of smaller developments a threshold of 10 or more dwellings; 0.5 ha or more for housing schemes; or more than 1000m² 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 2013³³.

³³ 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 1000m² 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**

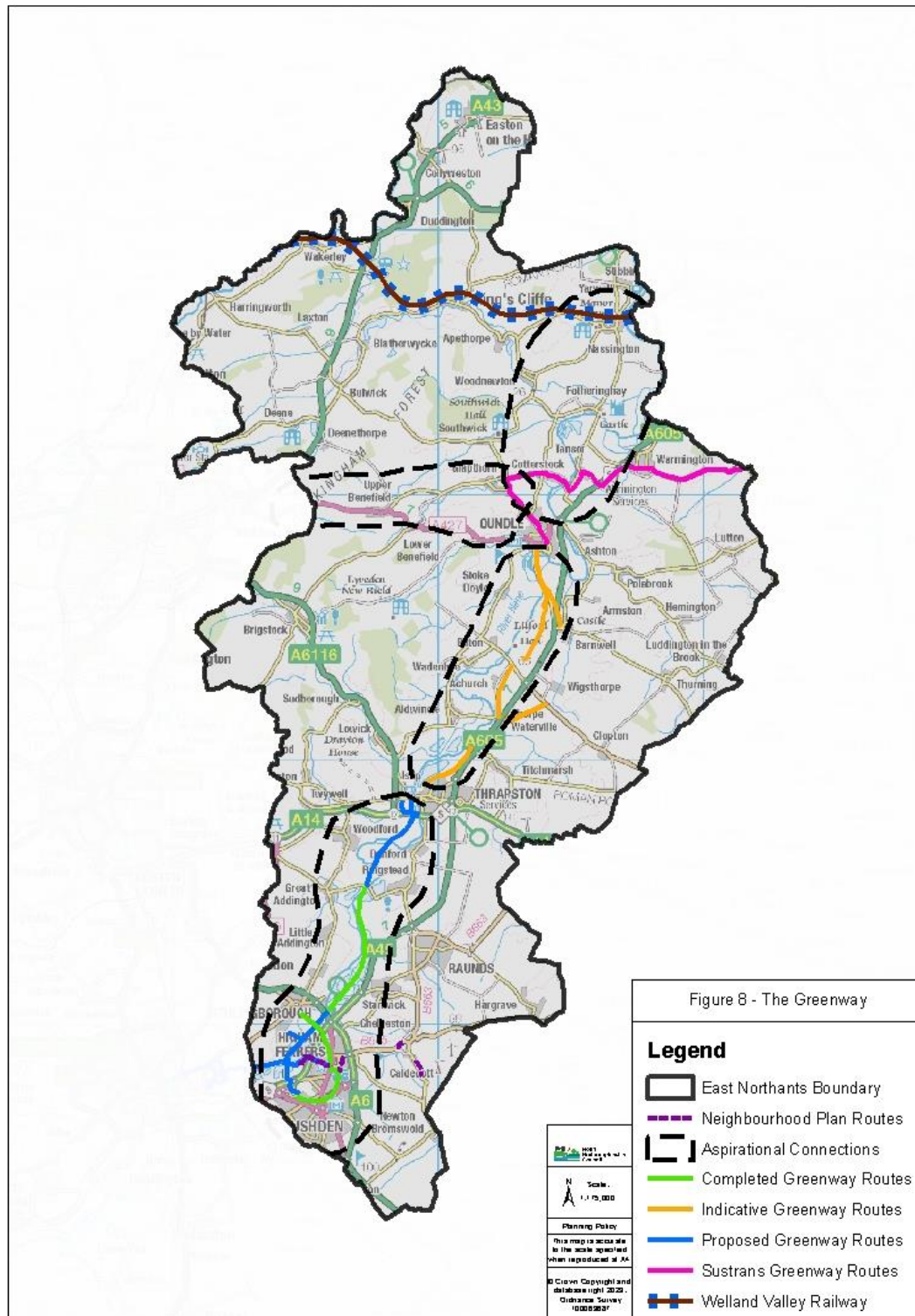
The Greenway

- 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 2024³⁴, 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

³⁴ 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 1000m² 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)³⁵.

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**

³⁵ 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)³⁶. 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)³⁷.

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

³⁶ https://www.east-northamptonshire.gov.uk/downloads/download/4484/open_space_and_playing_pitch_strategy

³⁷ https://www.east-northamptonshire.gov.uk/downloads/file/12105/background_paper_4_-_open_spaces

Quality Criteria	Value Criteria
<ul style="list-style-type: none"> Physical access 	<ul style="list-style-type: none"> Level of use
<ul style="list-style-type: none"> Personal security 	<ul style="list-style-type: none"> Structural and landscape benefits
<ul style="list-style-type: none"> Social access 	<ul style="list-style-type: none"> Ecological benefits
<ul style="list-style-type: none"> Parking 	<ul style="list-style-type: none"> Educational benefits
<ul style="list-style-type: none"> Information signage 	<ul style="list-style-type: none"> Social inclusion and health benefits
<ul style="list-style-type: none"> Equipment and facilities 	<ul style="list-style-type: none"> Cultural and heritage benefits
<ul style="list-style-type: none"> Location value 	<ul style="list-style-type: none"> Amenity benefits and sense of place
<ul style="list-style-type: none"> Site problems 	<ul style="list-style-type: none"> Economic benefits
<ul style="list-style-type: none"> Groups that the site meets the needs of 	<ul style="list-style-type: none"> Context of site in relation to other open spaces
<ul style="list-style-type: none"> Maintenance and cleanliness 	<ul style="list-style-type: none"> Designated site (e.g. LNR, SSSI)
<ul style="list-style-type: none"> Healthy, safe and secure 	<ul style="list-style-type: none"> Educational programme in place
<ul style="list-style-type: none"> Site potential 	<ul style="list-style-type: none"> Historic site
	<ul style="list-style-type: none"> Listed building or historical monument on site
	<ul style="list-style-type: none"> Registered 'friends of' group to the site

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.

Typology	Accessibility
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 ³⁸	Rushden	Thrapston	Rural
	(ha per 1000 population/ 417 households ³⁹)						
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 ⁴⁰	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.

³⁸ Raunds was identified as having no existing parks and gardens provision therefore the wider East Northamptonshire figure has been used.

³⁹ Applying 2.4 persons per household standard

⁴⁰ 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 adults⁴¹ 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.

⁴¹ 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 references⁴². 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

⁴² 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 Protocol⁴³, major applications (10+ homes or 1000m²+) 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) toolkit⁴⁴ 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

⁴³

http://www.nnjpdu.org.uk/site/assets/files/1456/updated_northamptonshire_planning_and_health_protocol_mar20.pdf

⁴⁴ <http://www.nnjpdu.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 1000m² 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 Cotterstock⁴⁵, and Pilton, Stoke Doyle and Wadenhoe⁴⁶ 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 2020⁴⁷) provides detailed guidance on extensions to residential properties in situations where they require Planning Permission. Earlier examples include the Domestic Waste Storage SPD (2012)⁴⁸, providing additional local guidance regarding the provision of domestic waste storage facilities for new residential development and the Shop Front SPD (2011)⁴⁹, 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,

⁴⁵ https://www.east-northamptonshire.gov.uk/downloads/file/11861/draft_cotterstock_village_design_statement

⁴⁶ https://www.east-northamptonshire.gov.uk/downloads/file/9056/adopted_pilton_stoke_doyle_and_wadenhoe_village_design_statement

⁴⁷ https://www.east-northamptonshire.gov.uk/downloads/file/11668/householder_extensions_supplementary_planning_document

⁴⁸ <https://www.northnorthants.gov.uk/planning-strategies-and-plans/supplementary-planning-documents-spd>

⁴⁹ <https://www.northnorthants.gov.uk/planning-strategies-and-plans/supplementary-planning-documents-spd>

September 2016⁵⁰) 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 users⁵¹;**
- 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 2018⁵² 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.

⁵⁰ <https://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Pages/northamptonshire-parking-standards.aspx>

⁵¹ A typical garden length will be 10.5m

⁵² <https://www.legislation.gov.uk/ukxi/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 2013⁵³). 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

⁵³ Item 7: 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 2017-2020⁵⁴, 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) partnership⁵⁵ 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.

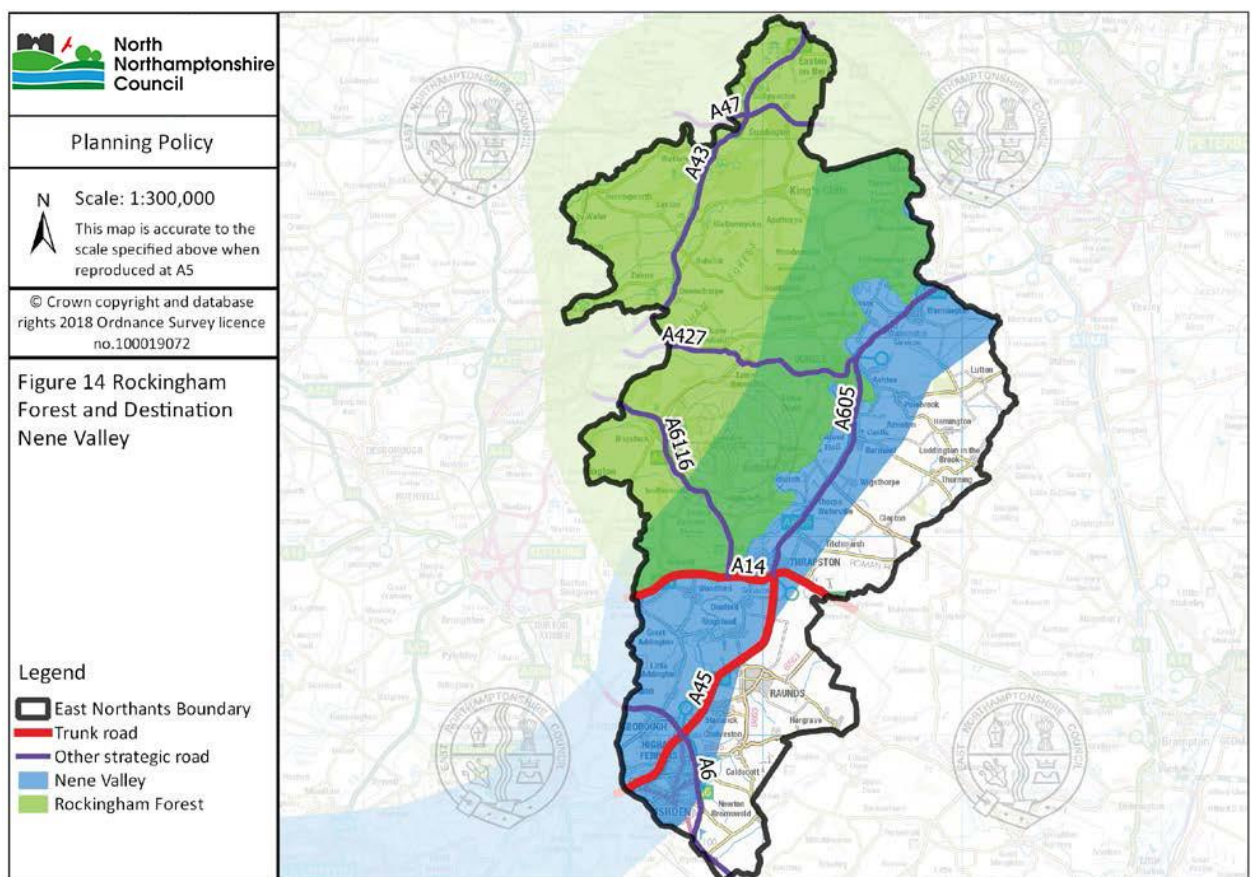
Cultural developments

⁵⁴ https://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=479&fileID=2016

⁵⁵ 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; 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.⁵⁶

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)⁵⁷ 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 2020⁵⁸). 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.

⁵⁶ 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.

⁵⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf

⁵⁸ 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*⁵⁹, 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*⁶⁰ 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 2020⁶¹, are set out at Appendix 2 of this Plan.

Macro-economic context: Strategic economic strategies

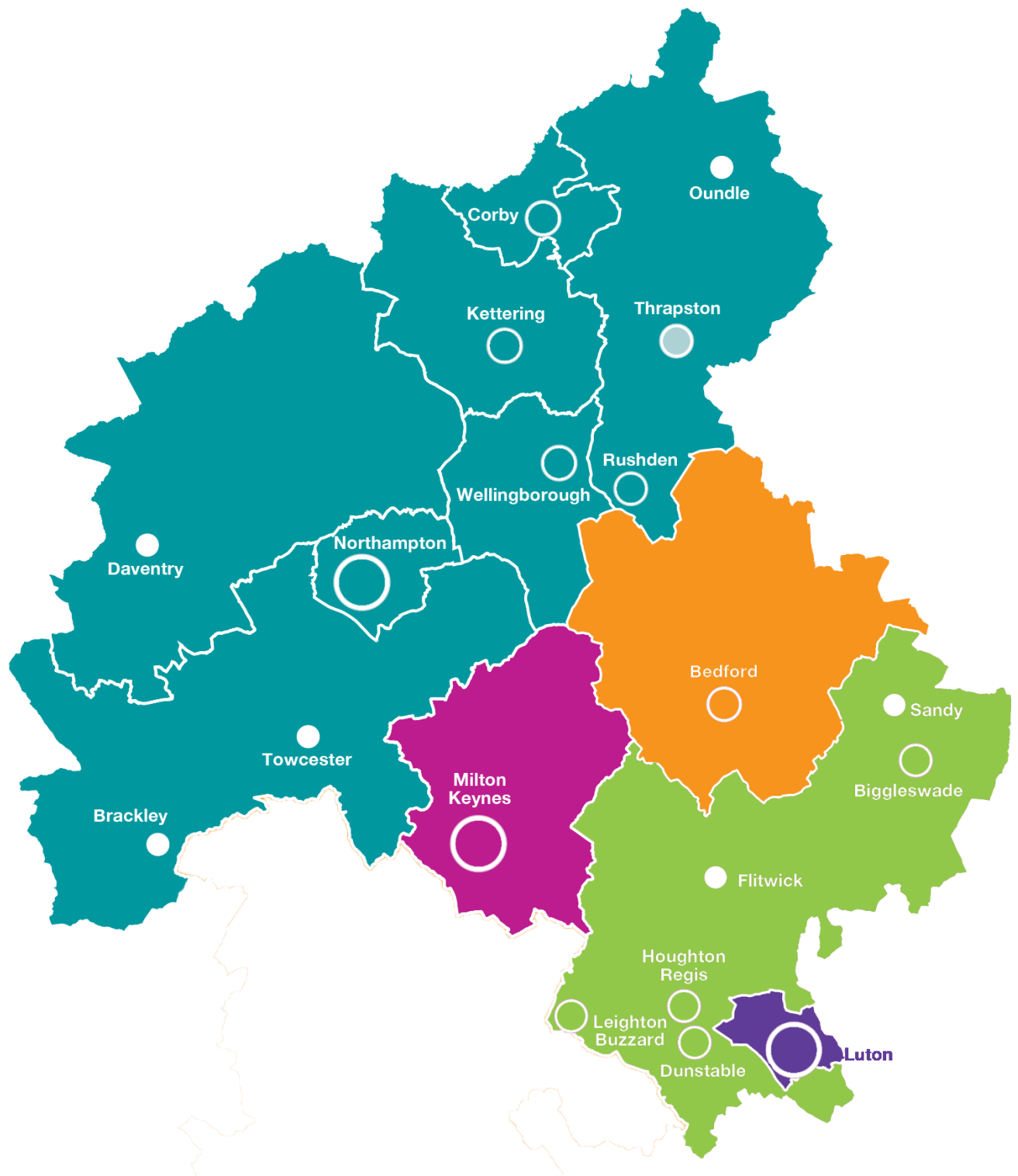
- 7.4 To help set out effective district level policies, this Plan should consider and reflect the strategic economic framework. The district forms the northernmost part of the South East Midlands Local Enterprise Partnership (SEMLEP) area; centred upon Milton Keynes and Northampton, and ranging from 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.

⁵⁹ https://www.east-northamptonshire.gov.uk/downloads/file/10850/enterprising_east_northants_strategy_2018

⁶⁰ https://www.east-northamptonshire.gov.uk/downloads/file/11859/recovery_through_enterprise_prospectus

⁶¹ <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 Plan⁶² 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

⁶² <https://www.semlep.com/strategic-economic-plan/>

the value of goods and services produced across the area by 2050⁶³. 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)⁶⁴, 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

⁶³ Known as "Gross Value Added", or "GVA"

⁶⁴ <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 reduce carbon dioxide emissions to 80% below 1990 levels by 2050 set out in the Climate Change Act 2008⁶⁵ and subsequently signed up to in the Paris Agreement. This is also highlighted in SEMLEP's Energy Strategy (December 2018)⁶⁶, 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:

⁶⁵ <https://www.legislation.gov.uk/ukpga/2008/27/contents>

⁶⁶ 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)⁶⁷:

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

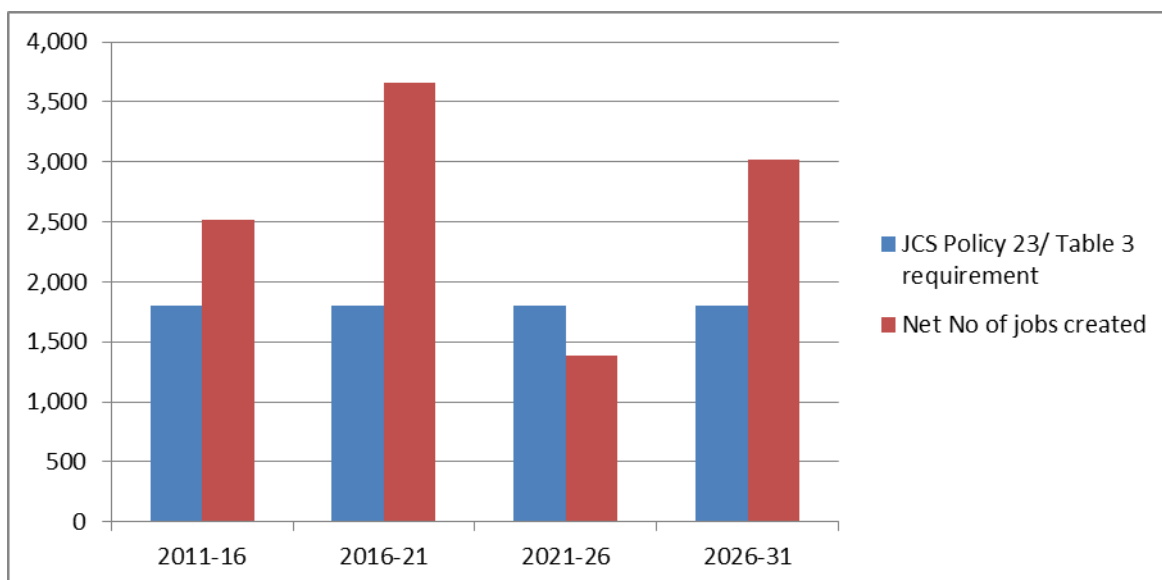
⁶⁷ http://www.nnjpu.org.uk/site/assets/files/1459/16461_nn_economic_prospectus_final_26_06_20.pdf

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
TOTAL	7,200	10,582	-3,382⁶⁸



2011-2021

7.19 During the first quarter of the Plan period (2011-2016) it is estimated that just over 2,500 jobs⁶⁹ 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

⁶⁸ 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

⁶⁹ 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)⁷⁰;
- 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)⁷¹. 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:

⁷⁰ 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).

⁷¹ 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 21st 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)⁷², 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

⁷² <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.⁷³ 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**

⁷³ 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. This definition has been retained for the purposes of this Plan.

Parking Standards⁷⁴

- c) Deliver pedestrian, cycle and public transport connections to adjacent businesses, residential areas and public open spaces, to maximise integration with the surrounding locality⁷⁵;**
- 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)⁷⁶ 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

⁷⁴ By way of example, the ENC Enterprise Centre at Michael Way, Raunds, has provided 114 spaces

⁷⁵ A Transport Assessment to assess these matters shall be submitted as part of as part of any planning application

⁷⁶ 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.

Table 10: Top 40 businesses		
Site name	Location	Top 40 businesses (measured by rateable value, as at 2018/19)
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

Table 10: Top 40 businesses		
Site name	Location	Top 40 businesses (measured by rateable value, as at 2018/19)
		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)⁷⁷ 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 use⁷⁸. 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 purposes⁷⁹; and/or**

⁷⁷ https://www.east-northamptonshire.gov.uk/downloads/file/12107/background_paper_6_-_protected_employment_areas

⁷⁸ Appendix 2 sets out the differentiation between main town centre uses (as defined by national policy) and other employment uses

⁷⁹ 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> ⁸⁰	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>

⁸⁰ 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, Raunds⁸¹ 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 2,500m² 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 2,500m² 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.

⁸¹ In Raunds this applies to development within the Primary Shopping Area defined through the Neighbourhood Plan

Table 12: Recent convenience retail developments		
Recent proposal or development scheme	Location	Gross floorspace (m²)
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 596⁸²) i.e. being less than 150m² 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 372m² (gross) floorspace development (250m² 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 280m² trading area⁸³).
- 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 100m² 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 (100-150m² 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 280m² Sunday

⁸² <https://www.legislation.gov.uk/uksi/2015/596/contents>

⁸³ 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 (<280m² floorspace – Use Class F.2) and comparison/ larger convenience retailing (>1 unit and/ or 280m² floorspace – Use Class E)

trading threshold is considered appropriate for Rushden. Further analysis is provided in the Retail impact assessments threshold Background Paper (BP7)⁸⁴.

Policy EN19: Impact test thresholds for retail development

Proposals for retail development outside the town centre boundaries of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds⁸⁵ 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 280m²; and**
- b) Market Towns Centres 100m².**

Impact assessments and Sequential tests should be prepared in accordance with the relevant national guidance⁸⁶. 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

⁸⁴ https://www.east-northamptonshire.gov.uk/downloads/file/12108/background_paper_7_-_retail_impact_assessment_thresholds

⁸⁵ In Raunds this applies to development outside the Primary Shopping Area defined through the Neighbourhood Plan

⁸⁶ 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)⁸⁷.

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 1000m² 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;

⁸⁷ 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 Schedule⁸⁸.

- 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.

Table 13: Major sites							
Location	Site name	Total Capacity	No of units, 20-20-2031	Delivery beyond 2031	Development Plan Document	Current status	Note
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
TOTAL	Major urban extensions	3700	1750	1950			

- 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).

⁸⁸ Planning Policy Committee, 8 June 2020, Agenda Item 10, Appendix 3: https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee

Table 14: Urban areas residual housing requirement, as at 1 April 2020	Housing requirement (2011-31)	Completions 2011-19	Completions 2018-20	% housing requirement delivered as at 31 March 2020	Commitments (starts and planning permissions) as at 1 April 2020	Commitments (resolutions to grant, Development Plan allocations, Rushden East) as at 1 April 2020	Residual requirement as at 1 April 2020 (committed sites deducted)
Growth Town							
Rushden	3,285	-1036	-19	32.1%	-175	-1515	-540
Market Towns							
Higham 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
TOTAL	7,580	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)⁸⁹.

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.

⁸⁹ 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 dwellings⁹⁰, 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.

Table 15: Rural areas residual housing requirement, as at 1 April 2020	District rural housing requirement 2011-31
JCS rural housing requirement 2011-31	820
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
RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL 2020	-76

- 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

⁹⁰ 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)⁹¹.

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)⁹², 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.

Population 2011 Census⁹³	Step increase in no of dwellings over 20 years	Range	Parishes/ Villages
<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

⁹¹ https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10_-_housing_requirements_-_rural

⁹² 2011 Census

⁹³ 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).

Population 2011 Census⁹³	Step increase in no of dwellings over 20 years	Range	Parishes/ Villages
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 2018⁹⁴), together with a sustainability appraisal of strategic options for Oundle (AECOM, December 2018⁹⁵) to inform the site selection process. This was followed by a more detailed reassessment of shortlisted sites (DLP Planning Ltd, July 2019⁹⁶). 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).

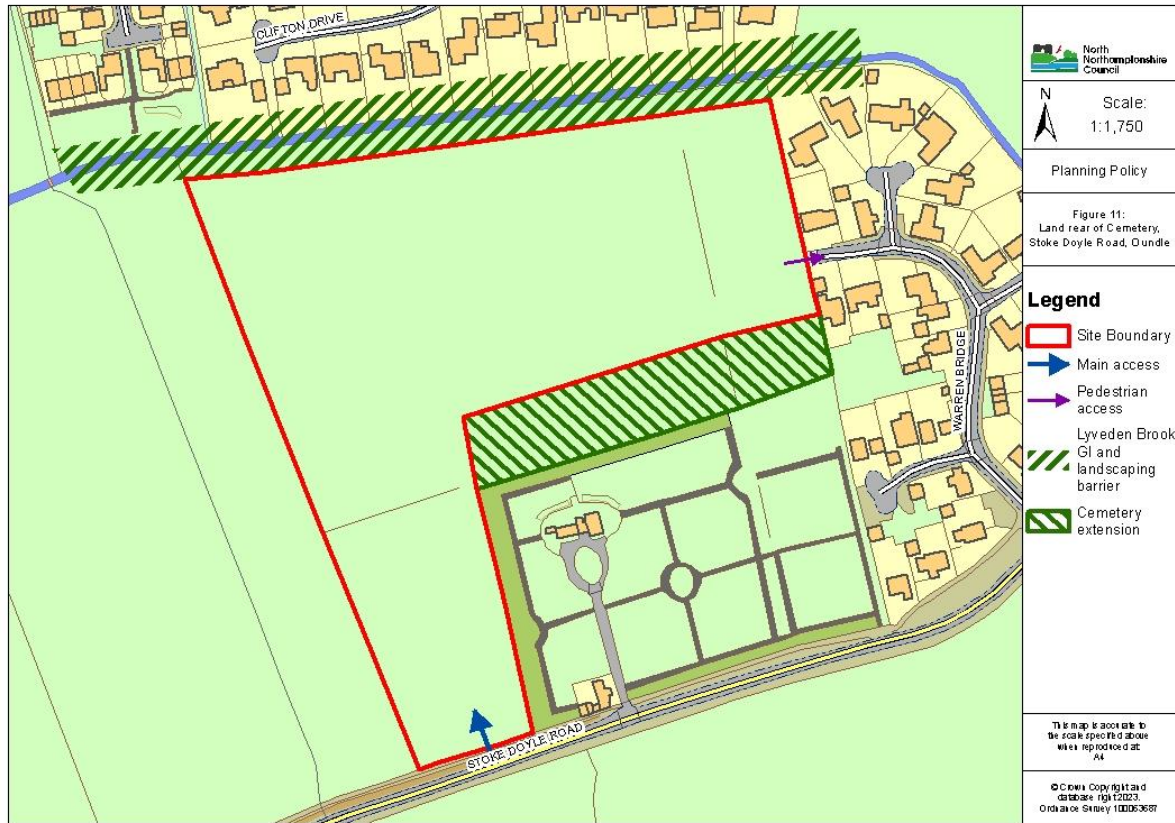
8.30 The site is located approximately 6.5km from the Upper Nene Valley Gravel Pits SPA, a specific wintering bird survey should therefore be undertaken for any planning application. The applicant will be required to provide evidence that the development will not result in a Likely Significant Effect. 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.

⁹⁴ https://www.east-northamptonshire.gov.uk/downloads/file/11074/oundle_site_assessments

⁹⁵ https://www.east-northamptonshire.gov.uk/downloads/file/11075/oundle_strategic_options_assessment

⁹⁶ 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:

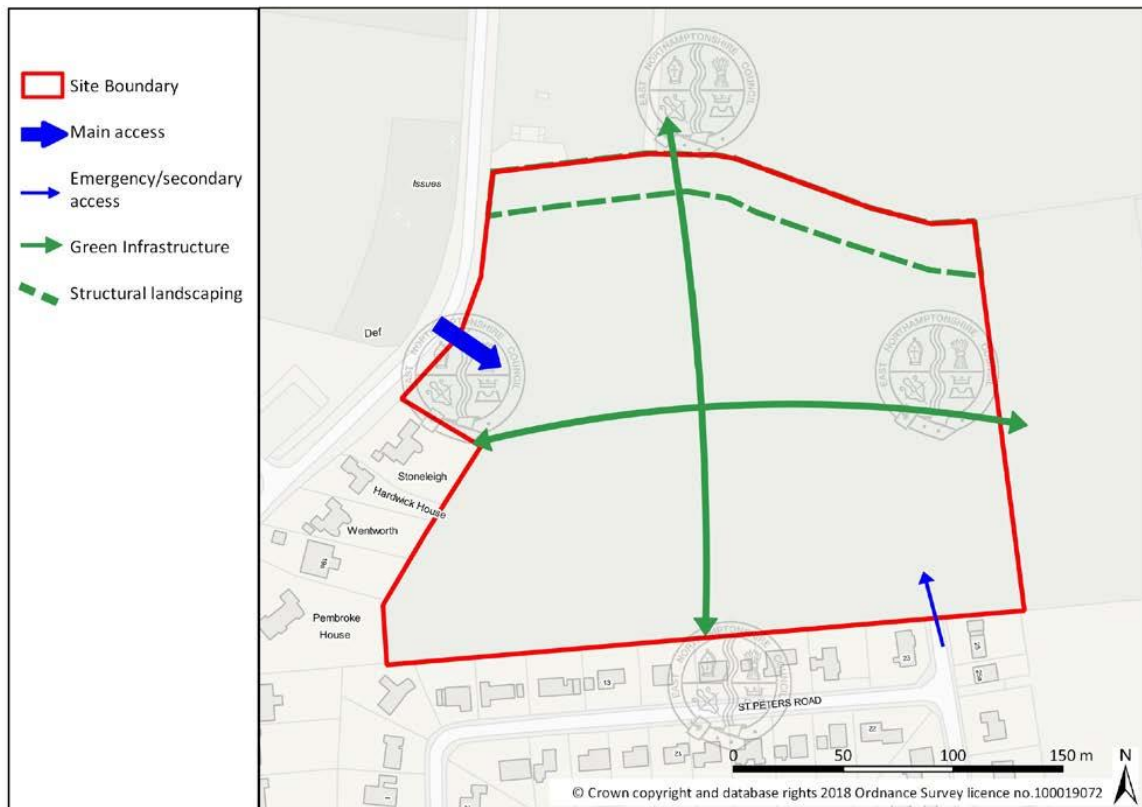
- a) This site is owned by two separate landowners but should be subject to a scheme that allows comprehensive development of the site.
- b) It will be expected to provide a housing mix which includes provision for older persons, on site affordable housing provision and 5% of plots should be made available 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 Road⁹⁷, 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

⁹⁷ 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

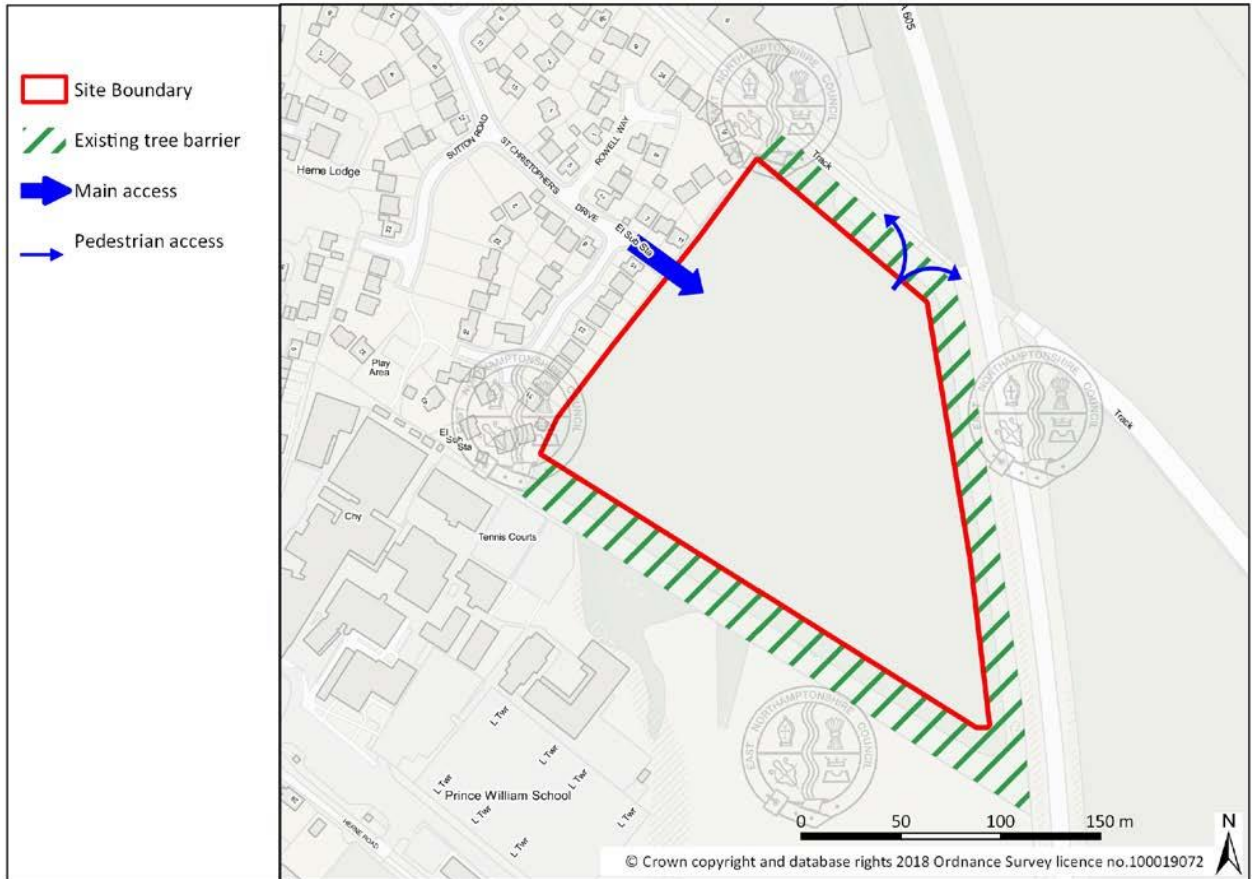
unacceptable impact on residents and that any mitigation can be achieved without detriment to the continuous operation of Oundle Water Recycling Centre. Structural landscaping will also be provided for the site boundary, to mitigate the impacts of smell or other pollution (e.g. from the water recycling 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 station⁹⁸. 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 AMR⁹⁹, 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*

⁹⁸ 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.

⁹⁹ <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 2016¹⁰⁰).

- 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 2019¹⁰¹. 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

¹⁰⁰ <http://www.nnjpd.org.uk/publications/north-northamptonshire-joint-core-strategy-inspectors-report-22nd-june-2016/>

¹⁰¹ Planning Policy Committee, 17th December 2019, Item 6: 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 2020¹⁰²), 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 population¹⁰³ of

¹⁰² https://www.east-northamptonshire.gov.uk/downloads/file/11974/background_paper_-_assessment_of_alternative_site_options

¹⁰³ 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 SHMA¹⁰⁴ 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

¹⁰⁴ <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)¹⁰⁵. 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 properties¹⁰⁶.
- 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

¹⁰⁵ https://www.east-northamptonshire.gov.uk/downloads/file/10894/informing_east_northamptonshires_housing_mix_evidence_to_support_planning_for_large_residential_properties_final_report

¹⁰⁶ 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

2017¹⁰⁷) 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.

Table 18	Specialist older person's housing shortfall (East Northamptonshire)				
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

¹⁰⁷ <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, Rushden¹⁰⁸ will, subject to viability, be supported to deliver specific Extra Care provision
- East of Ferrers School, Higham Ferrers¹⁰⁹ 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

¹⁰⁸ Rushden Neighbourhood Plan Policy H2F

¹⁰⁹ 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)¹¹⁰ 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)¹¹¹ which, together with associated secondary legislation (Regulations¹¹²), 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.

¹¹⁰ <https://www.legislation.gov.uk/ukpga/2015/17/contents>

¹¹¹ <https://www.legislation.gov.uk/ukpga/2016/22/contents>

¹¹² <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 housing¹¹³. 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 housing¹¹⁴. Further analysis is provided through the Self-build and Custom Housebuilding Background Paper (BP11¹¹⁵).
- 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

¹¹³ https://www.east-northamptonshire.gov.uk/downloads/file/11328/custom_and_self_build_demand_assessment_framework_three_dragons_december_2018

¹¹⁴ https://www.east-northamptonshire.gov.uk/downloads/file/11329/enc_response_to_three_dragons_report_dec_2018

¹¹⁵ 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)¹¹⁶, 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 2015¹¹⁷ 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 GTAA¹¹⁸. Households that do not meet the current definition should be assessed as part of the overall housing

¹¹⁶ <http://www.nnjpdu.org.uk/publications/north-northamptonshire-gypsy-and-traveller-accommodation-assessment-update-2011/>

¹¹⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

¹¹⁸ 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
Gypsies and Travellers		
Meet Planning Definition	0	0
Undetermined	14	3
Do not meet Planning Definition	11	0
Travelling Showpeople		
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 (2017¹¹⁹, 2018¹²⁰, 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
TOTAL		2,300	1250

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 2016¹²¹).

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

¹¹⁹ <http://www.nnjpdu.org.uk/publications/amr-2016-17-assessment-of-housing-land-supply-2018-23-may-2018/>

¹²⁰ <http://www.nnjpdu.org.uk/publications/amr-2017-18-assessment-of-housing-land-supply-2019-24/>

¹²¹ <http://www.nnjpdu.org.uk/publications/north-northamptonshire-joint-core-strategy-inspectors-report-22nd-june-2016/>

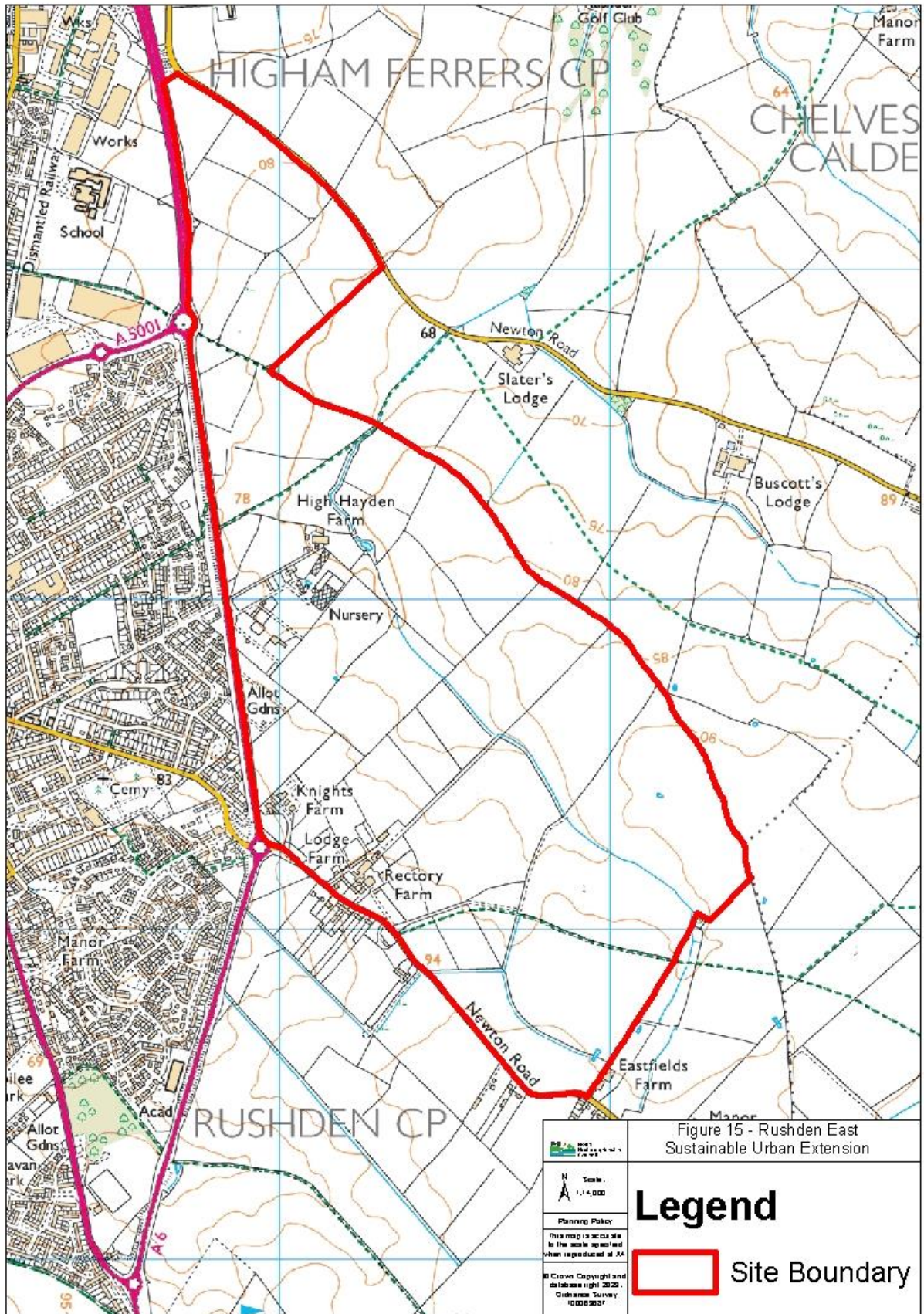
which, in association with the strategic framework set by the Joint Core Strategy, should allow for the timely implementation of the SUEs.

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 2014¹²²) 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.

¹²² <http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1549>

Figure 15: Rushden East Sustainable Urban Extension



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 2014¹²³, subject to the completion of a S106 agreement. Amended conditions and the draft S106 Agreement Heads of Term were subsequently agreed in August 2015¹²⁴. 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).

¹²³ https://www.east-northamptonshire.gov.uk/meetings/meeting/547/development_control_committee

¹²⁴ 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.

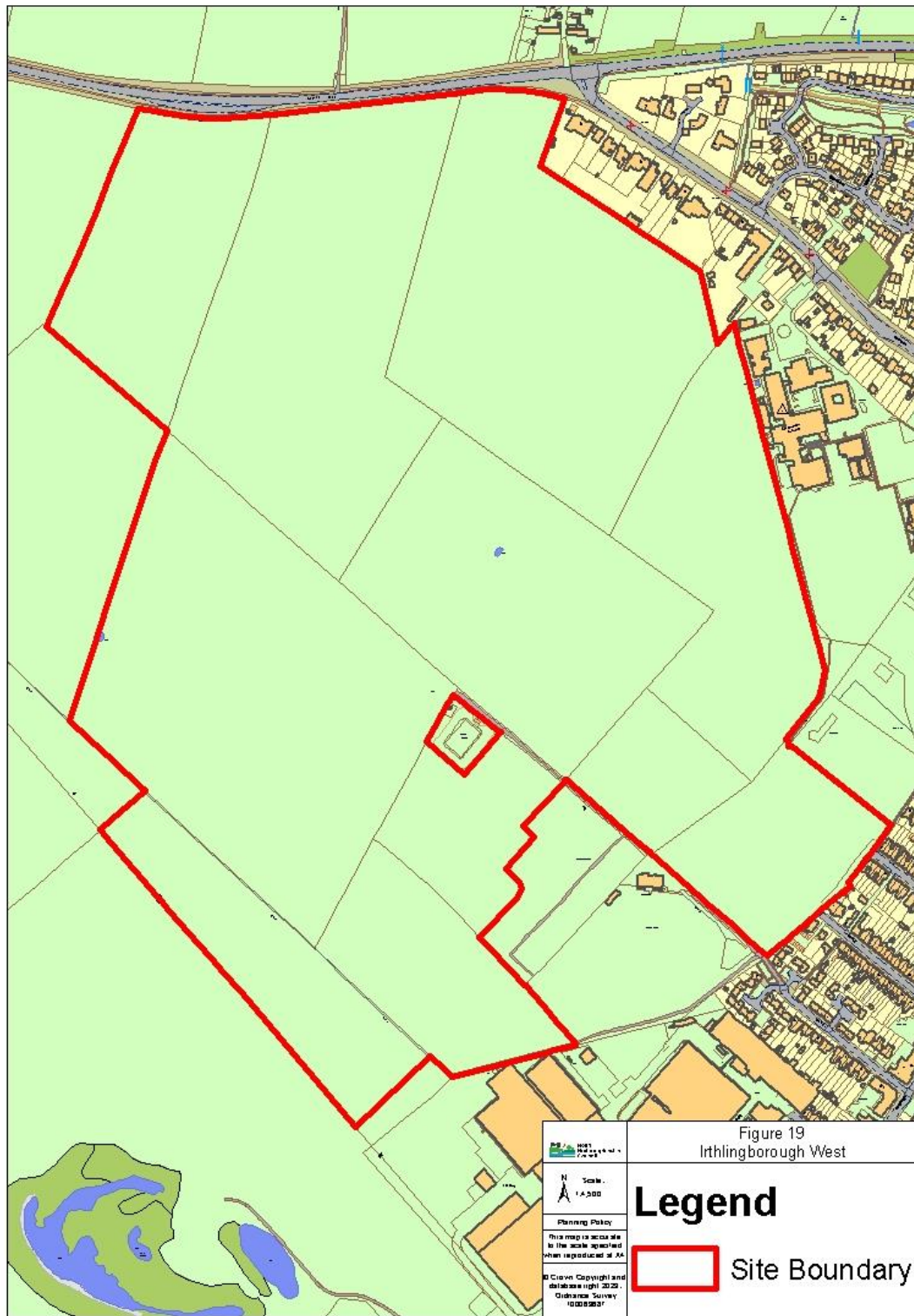
Table 21 - Irthlingborough West - breakdown of the development area

Land use typology	Gross developable area (ha)
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
TOTAL	49.63

- 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 2013¹²⁵) 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

¹²⁵ <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 21st 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 Plan 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 Study¹²⁶ 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 Register¹²⁷.

¹²⁶ <http://www.nnjpdu.org.uk/publications/north-northamptonshire-urban-structures-study-january-2015/>

¹²⁷ <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

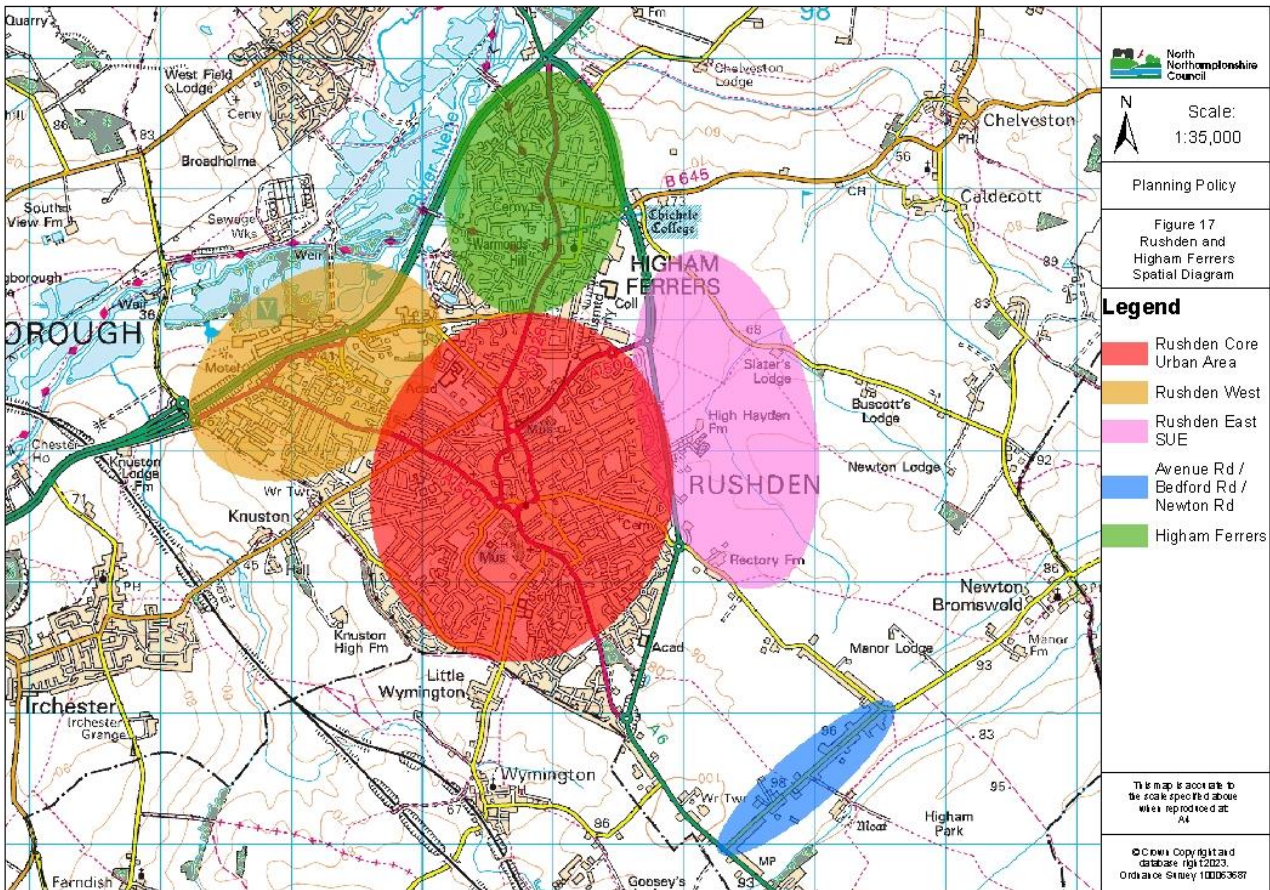


Table 22 Spatial parts of Rushden and Higham Ferrers

Spatial parts of Rushden and Higham Ferrers	Characteristics
Core urban area	<ul style="list-style-type: none"> • Defined by radial routes – Higham Road/ High Street/ Bedford Road (north-south) and John Clark Way/ Newton Road/ Wellingborough Road (east-west) • Based around Victorian terraced roads, with former Boot and Shoe factory sites, with post-war suburban development to the south • Distribution centre to east of town centre, off John Clark Way (Spire Road) constructed late 2000s • Includes key services and facilities – town centre, leisure centres (Pemberton Centre/ Splash Pool), schools • Character defined main public open spaces – Rushden Hall Park, Spencer Park
Rushden West (employment area)	<ul style="list-style-type: none"> • Main employment area of Rushden • Longstanding industrial area, has grown in a piecemeal way over a long period • Includes environmentally challenging businesses e.g. Monoworld, Sander’s Lodge (waste)

Spatial parts of Rushden and Higham Ferrers	Characteristics
	treatment) <ul style="list-style-type: none"> • Incorporates Rushden Lakes and Rushden Gateway – main new employment sites • Includes enhanced visitor access to Nene Valley, via Rushden Lakes
Rushden East (Sustainable Urban Extension)	<ul style="list-style-type: none"> • Proposed strategic urban extension to east of A6 Bypass • Requires new east-west connections across A6 • Development will include new community infrastructure; e.g. schools, neighbourhood centre • Development will be supported by strategic green infrastructure
Avenue Road/ Bedford Road/ Newton Road	<ul style="list-style-type: none"> • Ribbon development, connecting Newton Road, Avenue Road and Bedford Road • Suburban character • Includes a mix of rural businesses (e.g. stables) and more urban uses (e.g. care homes)
Higham Ferrers	<ul style="list-style-type: none"> • Self contained urban area, enclosed by Rushden (south), A6 Bypass (east) and A45 Bypass (west) • Historic market town – includes many heritage assets e.g. Chichele College, Castle • Main employment area to the east of the town (south of Kimbolton Road) • Individual character areas are defined in the Higham Ferrers Neighbourhood Plan

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 events¹²⁸ 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.

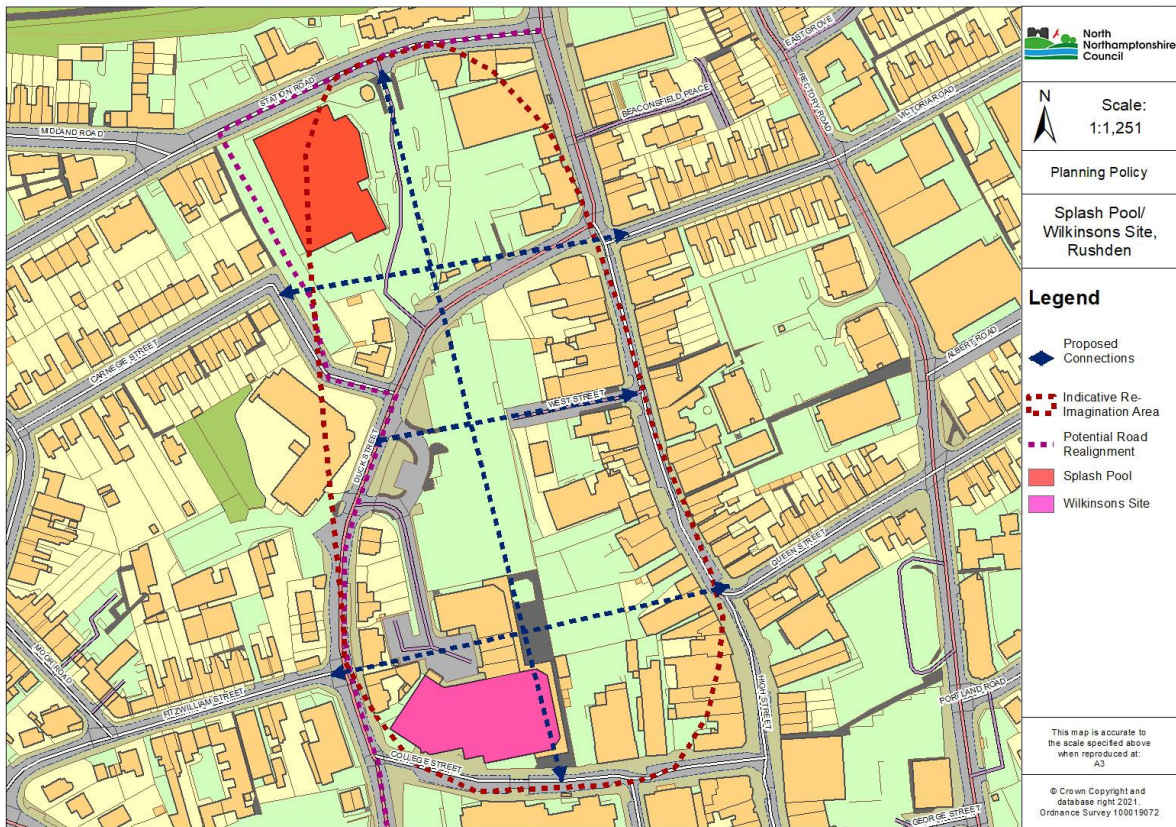
10.16 The Council's Economic Strategy seeks to revitalise and bring investment into the district's town centres. It proposes active measures for "Driving Town Centre Revitalisation". This is a particular issue for Rushden, as the designated Growth Town and largest town centre within the district.

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.

¹²⁸ https://www.east-northamptonshire.gov.uk/meetings/meeting/837/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)¹²⁹ 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

¹²⁹ 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)¹³⁰.

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.

¹³⁰ 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:

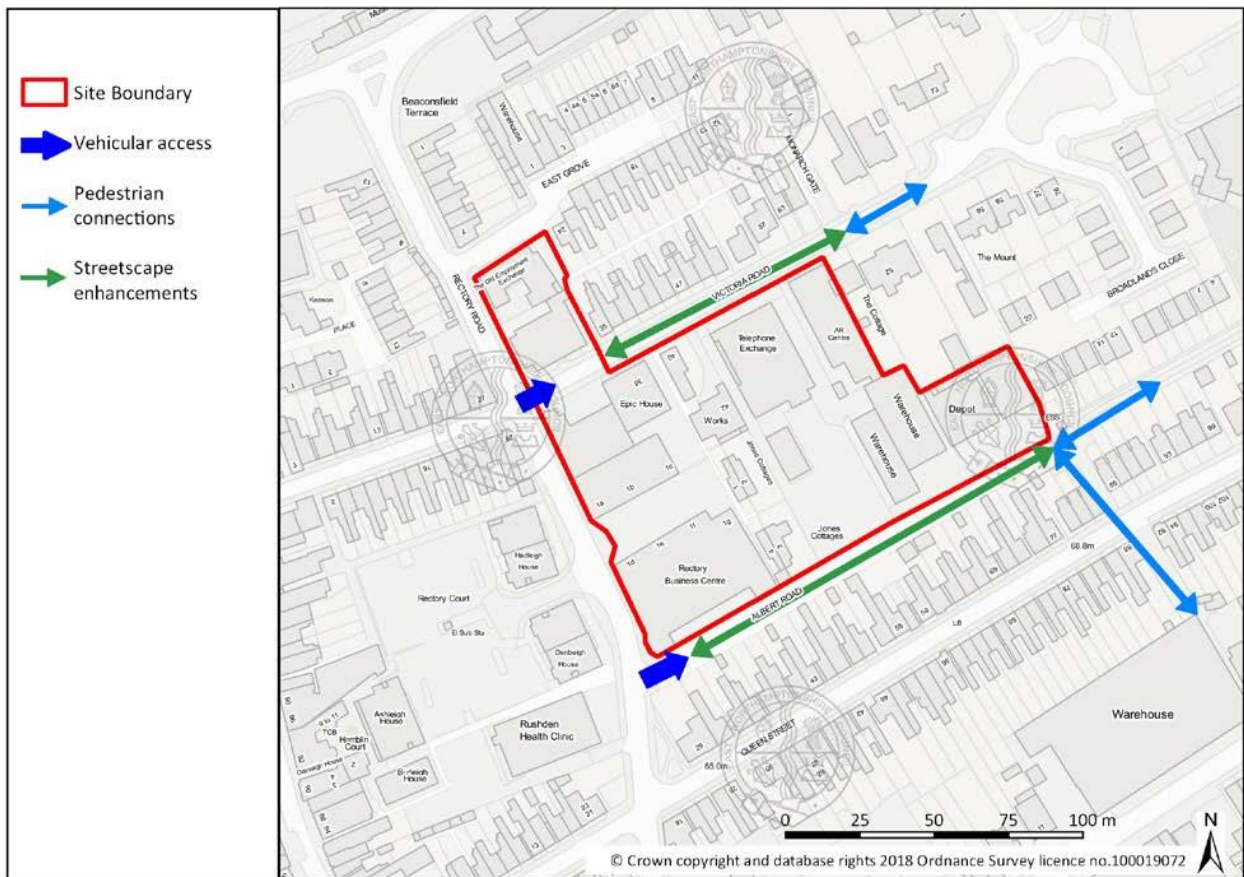
- a) A mix of housing types and tenures to meet local needs, consisting of predominantly small and medium sized properties;
- b) Appropriate development contributions towards education (primary and secondary), employment and the Greenway;
- c) Vehicular access off Oakley Road; and
- d) Pedestrian and 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.

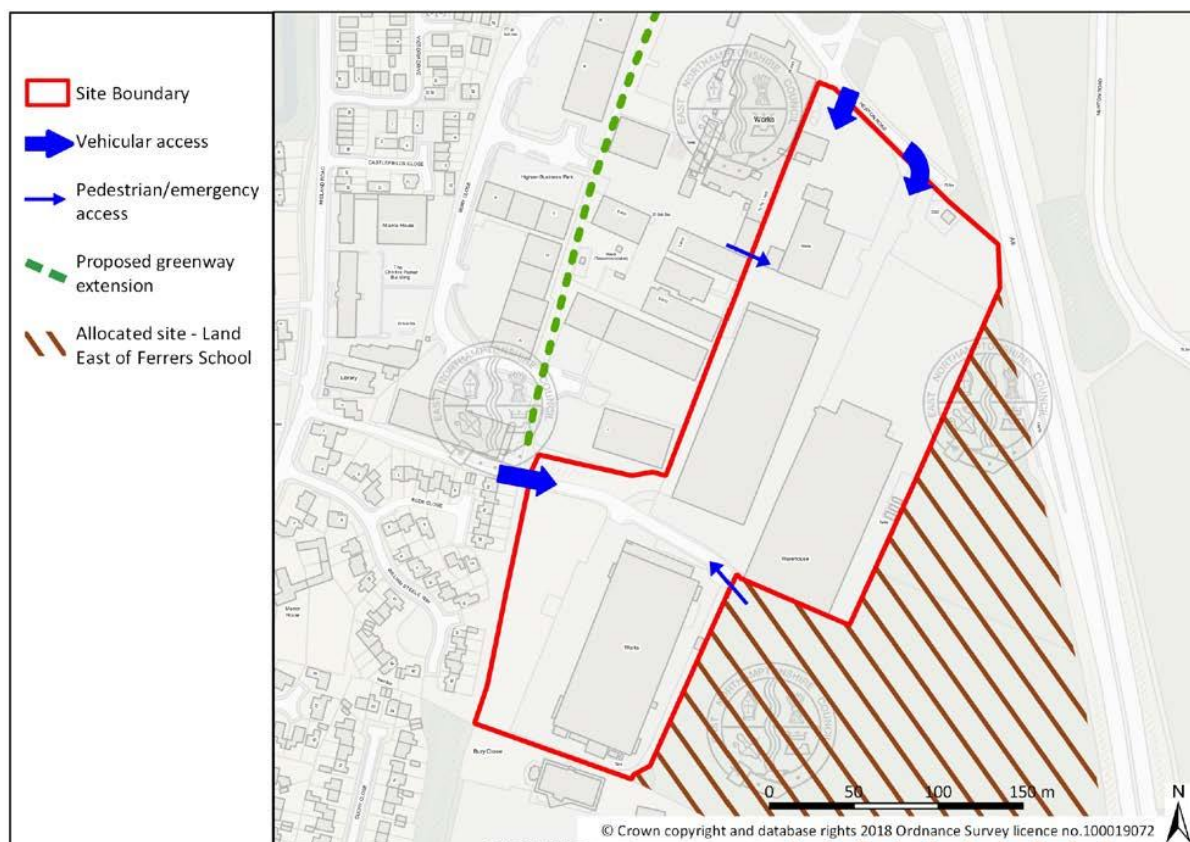
Brownfield sites

- 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 18,000m²) 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)¹³¹ 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).

¹³¹ 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

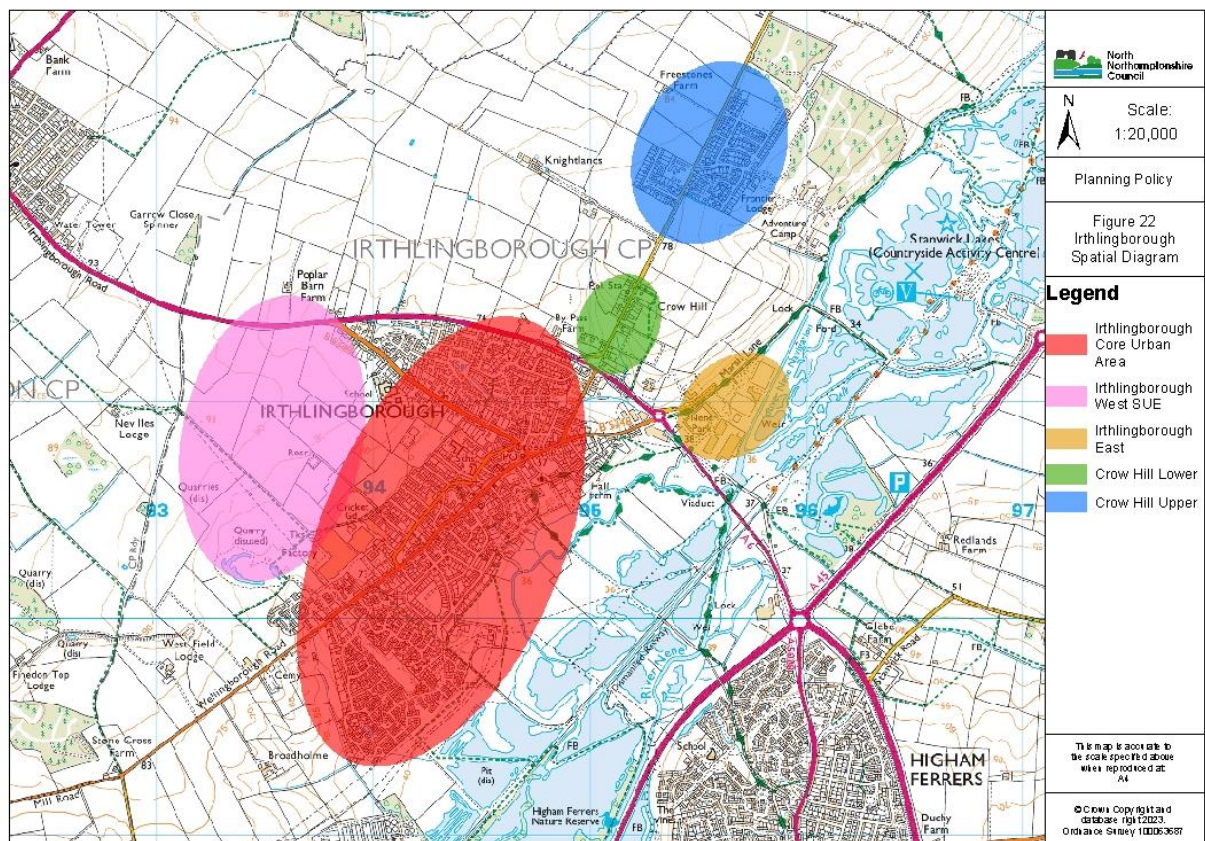


Table 23: Spatial parts of Irthlingborough

Spatial parts of Irthlingborough	Characteristics
Core urban area (existing)	<ul style="list-style-type: none"> • South of the A6, defined by main arterial routes – Finedon Road, Station Road, Wellingborough Road • Includes key services and facilities – town centre, schools • Hosts main employer – Whitworth
Irthlingborough West (Sustainable Urban Extension)	<ul style="list-style-type: none"> • Permitted major extension to main urban area • Will enable new Finedon Road (A6) and Wellingborough Road connections
Irthlingborough East	<ul style="list-style-type: none"> • Former principal employment and leisure hub • Separated from main urban area by A6 Bypass • Two main elements – Nene Park (former Rushden & Diamonds FC stadium, south of Diamond Way/ Marsh Lane) and Nene Business Park (mixed use redevelopment site, north of Diamond Way/ Marsh Lane) • Mixed use developments at Nene Business Park site (Attley Way) currently under construction – new food/ convenience retailing, housing
Crow Hill (lower)	<ul style="list-style-type: none"> • Ribbon development along Addington Road • Separated from main urban area by A6 Bypass • Characteristically suburban, but with rural elements e.g. Bypass Farm/ butchers
Crow Hill (upper)	<ul style="list-style-type: none"> • Secondary/ smaller part of Irthlingborough, with urban character • Separated from main urban area by A6 Bypass and some agricultural fields • Addington Road provides main arterial route • Includes some local services, facilities and businesses – convenience store, community centre, Frontier Centre

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

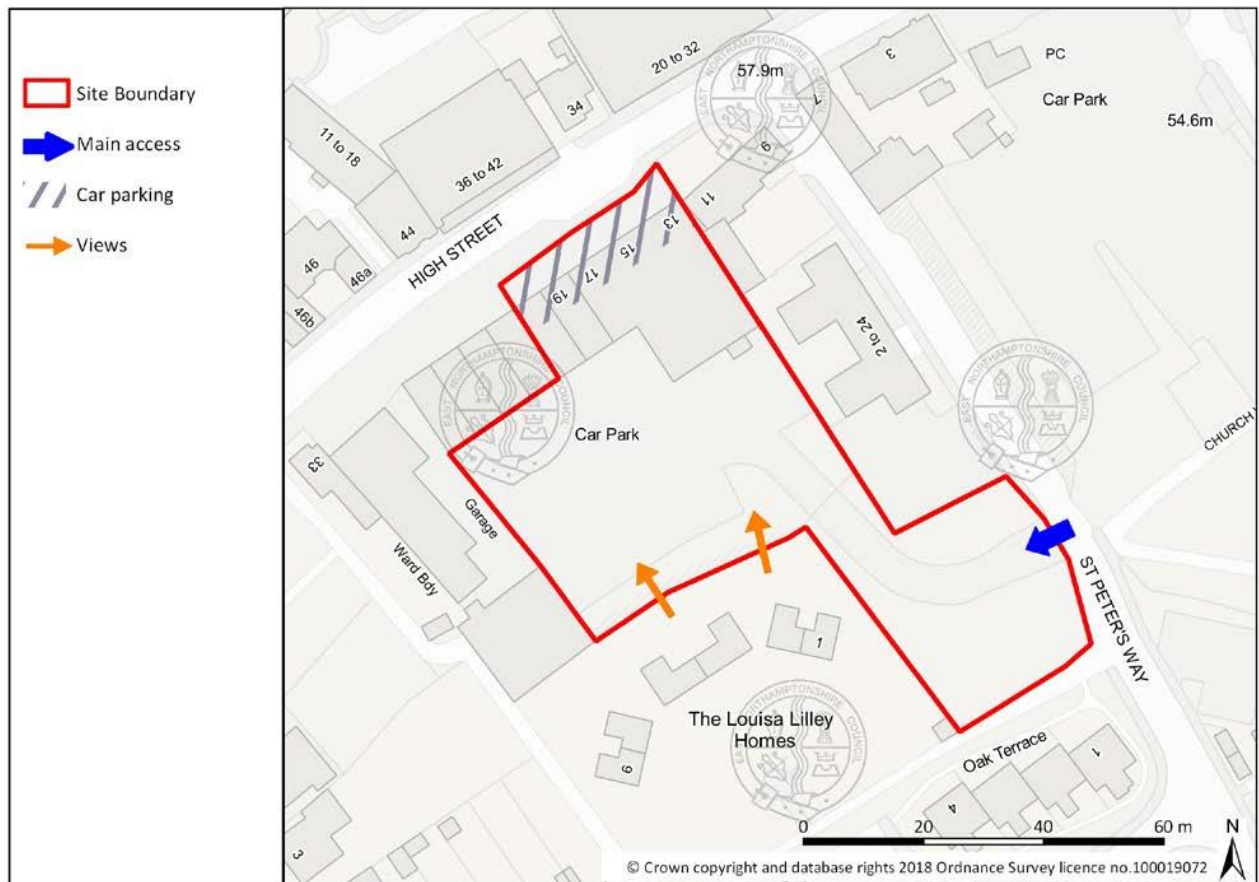
10.47 The Irthlingborough West Sustainable Urban Extension is identified as a strategic commitment in the Joint Core Strategy and the Council will continue to work to promote and support the successful delivery of this. Permission for the comprehensive redevelopment of the adjacent Whitworths food factory 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:

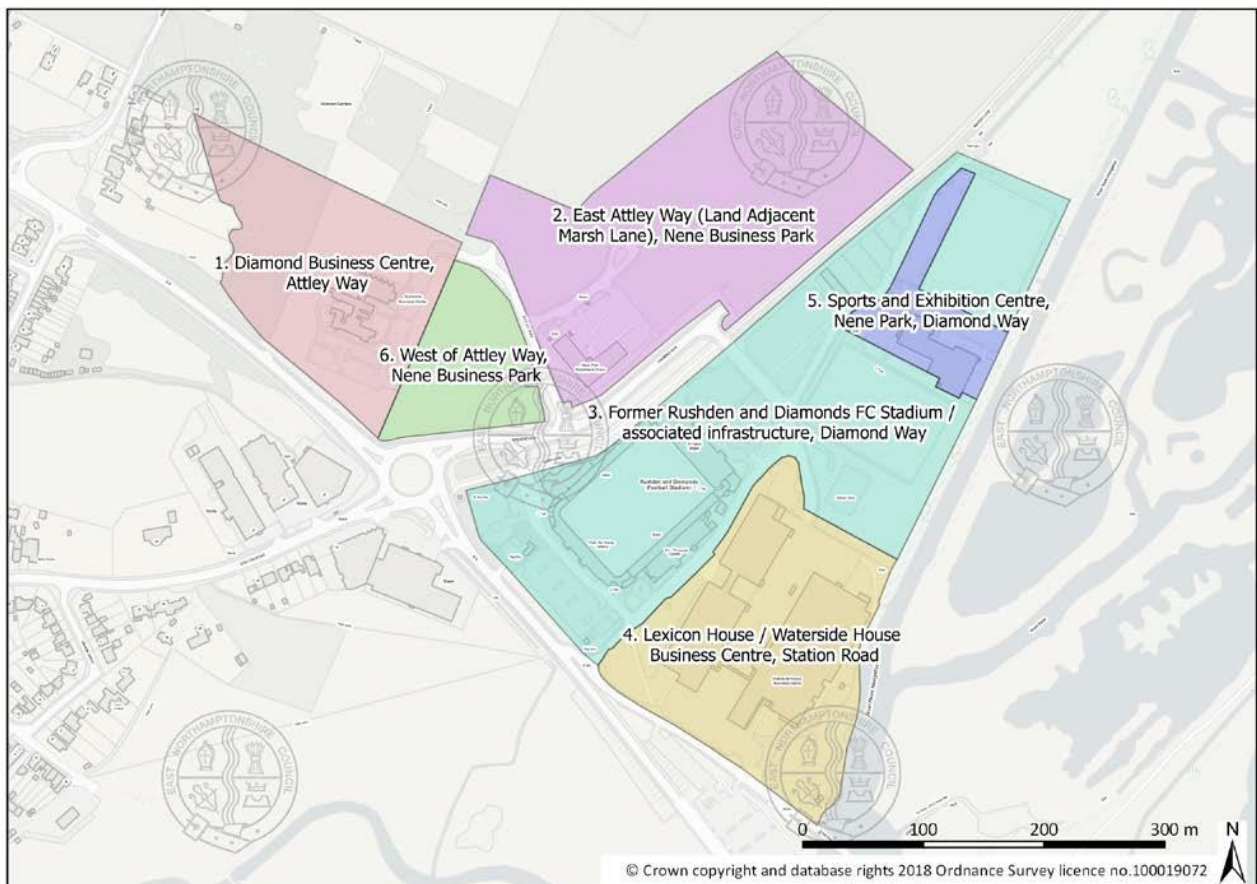
- a) A balance and mix of main town centre uses, including convenience and comparison retailing, financial services and/ or food and drink businesses;
- b) Enhancements to the High Street primary shopping frontage;
- c) Pedestrian connections between the High Street, St Peter's Way and St Peter's Church;
- 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)¹³². 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

¹³² 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

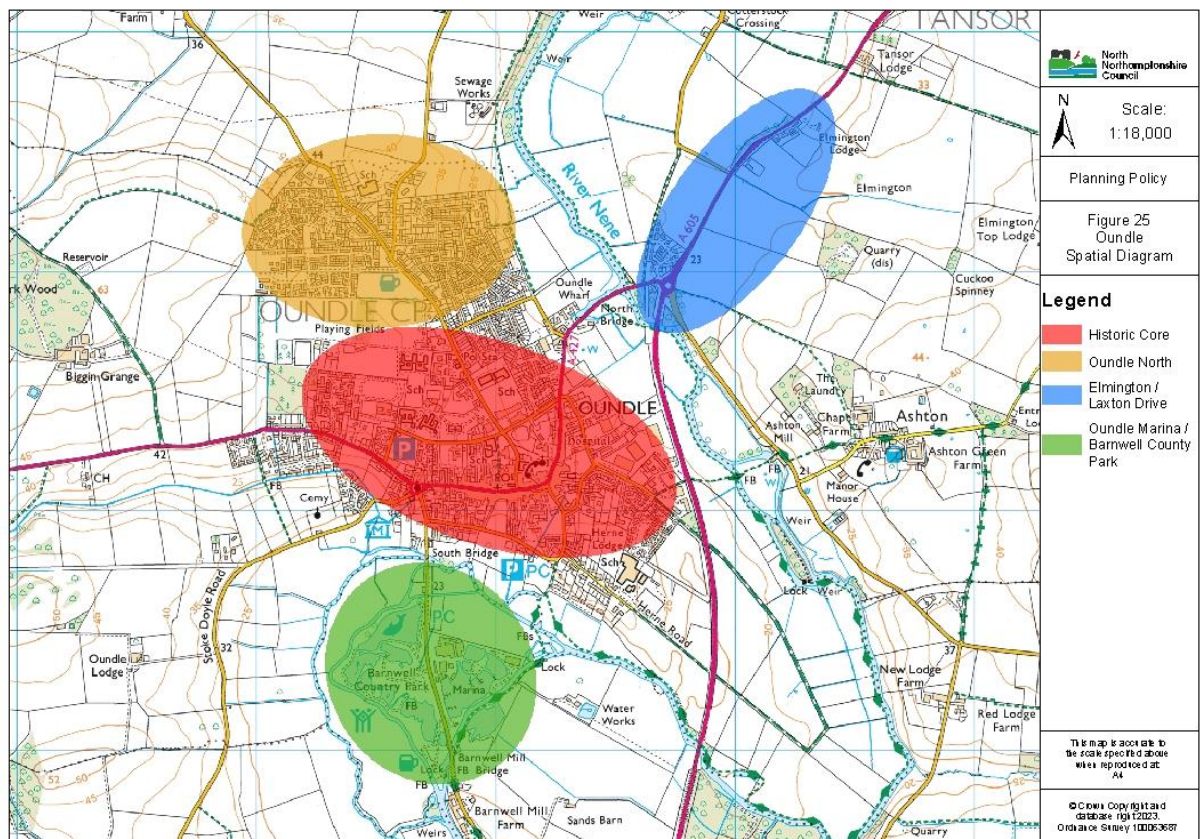


Table 24: Spatial parts of Oundle

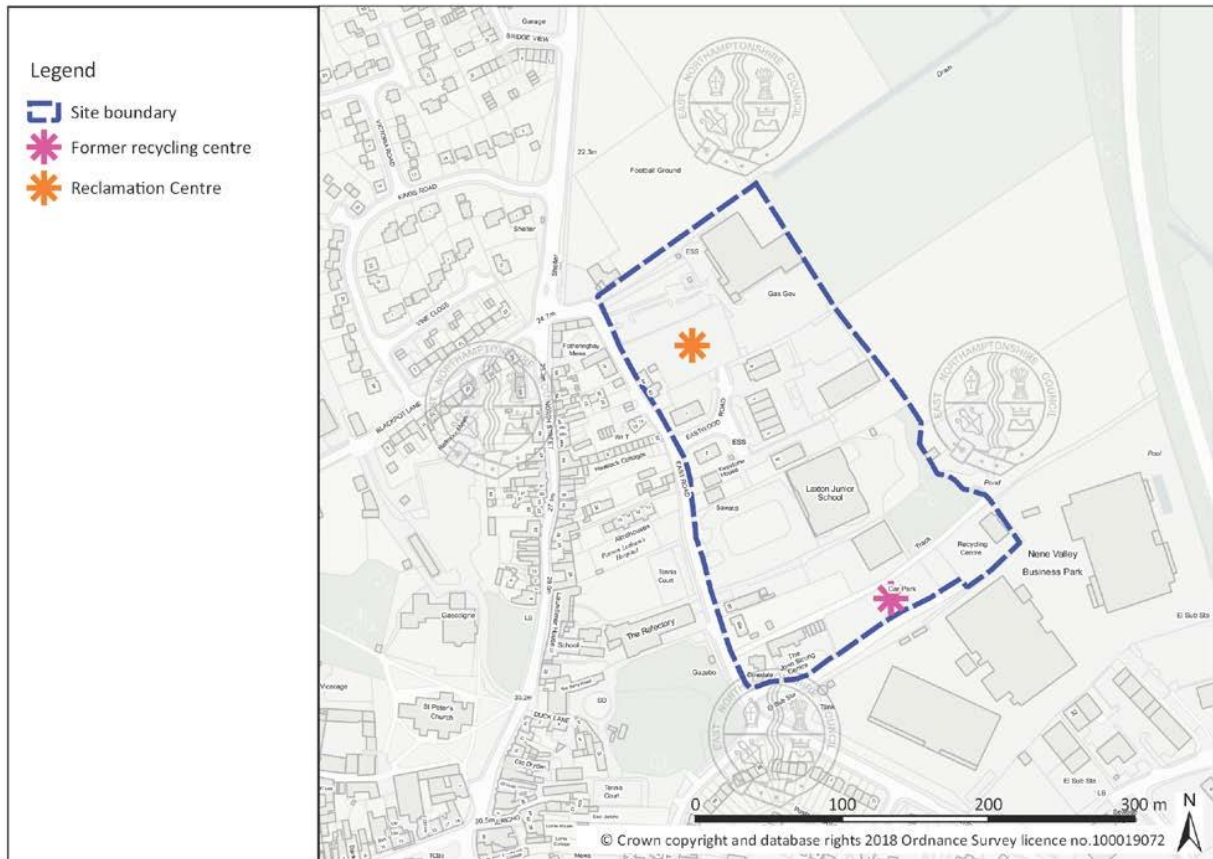
Spatial parts of Oundle	Characteristics
Historic core	<ul style="list-style-type: none"> Defined by West Street and North Street; the Market Place which links them and New Street (A427) Includes key services and facilities – town centre Historic character defined by Oundle School Main employment areas situated to the east of the historic core of the town– Nene Business Park/ Fairline Boats; East Road

Spatial parts of Oundle	Characteristics
Oundle north	<ul style="list-style-type: none"> • Suburban urban extension, north of New Road, focused upon arterial Glapthorn Road/ Cotterstock Road • Developed since 1950s • Focal points – Oundle Primary School, Occupation Road playing fields • Potential for expansion of urban area to the north (Oundle/ Glapthorn Parish), but recognise concerns regarding potential coalescence with Glapthorn
Oundle Marina/ Barnwell Country Park	<ul style="list-style-type: none"> • Significant tourism and leisure hub • Separated from main urban area by River Nene • Majority of area is functional floodplain • Committed redevelopment proposal – Oundle Marina • Further opportunities e.g. Barnwell Mill
Elmington/ Laxton Drive (Ashton Parish)	<ul style="list-style-type: none"> • Ribbon development along A605 • Separated from main urban area by A605 Bypass • Suburban element (Laxton Drive) • Riverside Hotel presents redevelopment challenge

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



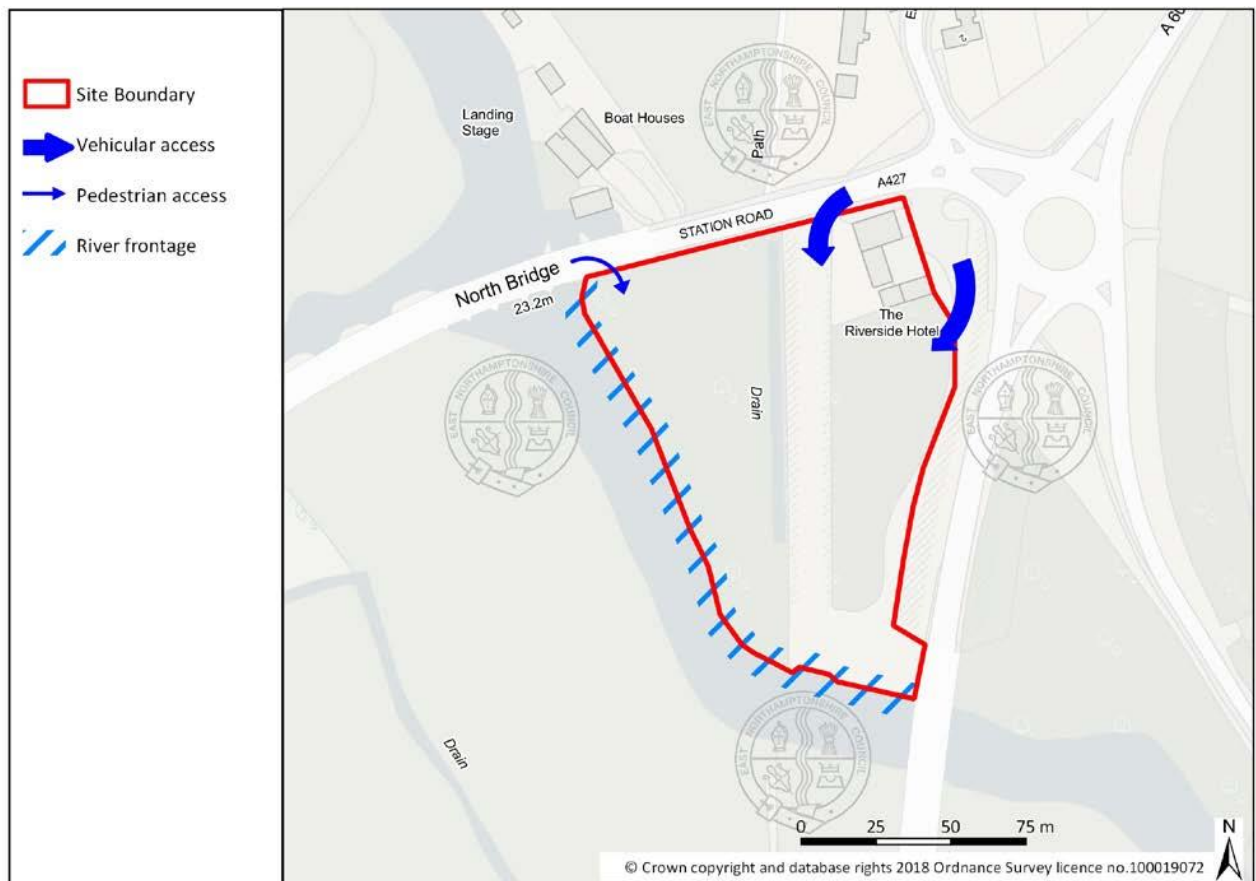
East Road employment areas

- 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

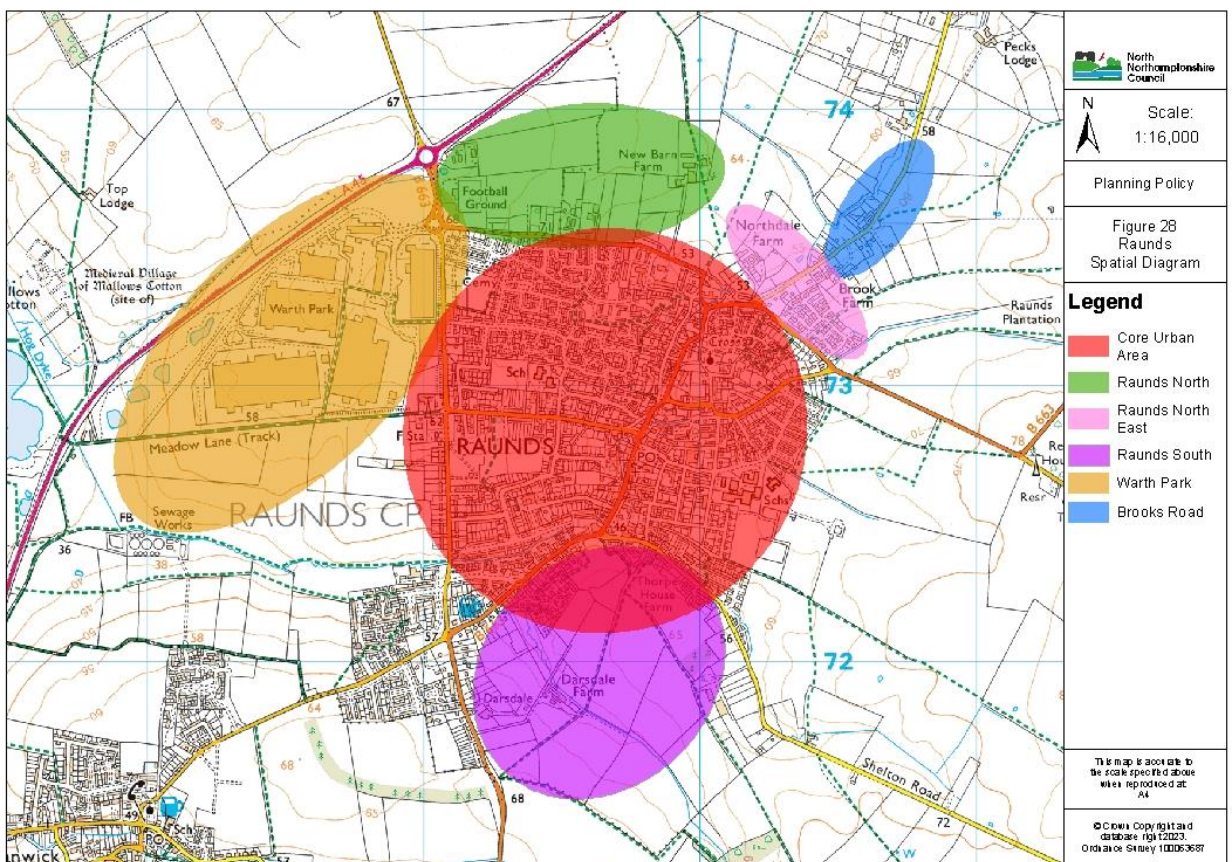


Table 25 Spatial parts of Raunds

Spatial parts of Raunds	Characteristics
Core urban area	<ul style="list-style-type: none"> Defined by London Road (west), Brick Kiln Road (north) and High Street/ Brook Street Includes key services and facilities – linear town centre, focused on The Square/ Brook Street Historic character defined by St Peter’s Church

	<ul style="list-style-type: none"> • Hosts significant suburban areas to the east and west of High Street/ Brook Street
Raunds north	<ul style="list-style-type: none"> • Sustainable urban extension to the north of Brick Kiln Road (also known as Border Park) • Developed since 2013 • Focal points – Raunds Town FC, new London Road/ Michael Way local centre/ service hub adjacent to A45 • Potential for further expansion of urban area to the east of Border Park
Raunds north east	<ul style="list-style-type: none"> • Sustainable urban extension to north east of existing urban area, known as Northdale End • Significant new green infrastructure corridor adjacent to Brooks Road, utilising Hog Dyke
Raunds south	<ul style="list-style-type: none"> • Sustainable urban extension to the south of the town • Two significant developments to south of Grove Street – Weighbridge Way (developed during 2000s) and Willow Way (2010/11) • Major development at Darcy Park (also known as Darsdale Farm) recently started, including significant new public open space
Warth Park (west of Raunds)	<ul style="list-style-type: none"> • Main employment area of Raunds • Major strategic warehousing and distribution site • Also includes significant new green infrastructure between warehouses and A45
Brooks Road	<ul style="list-style-type: none"> • Ribbon development along Brooks Road, beyond Northdale End • Suburban character • Transition between urban (Northdale End) and rural (Brook Farm Livery Stables)

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

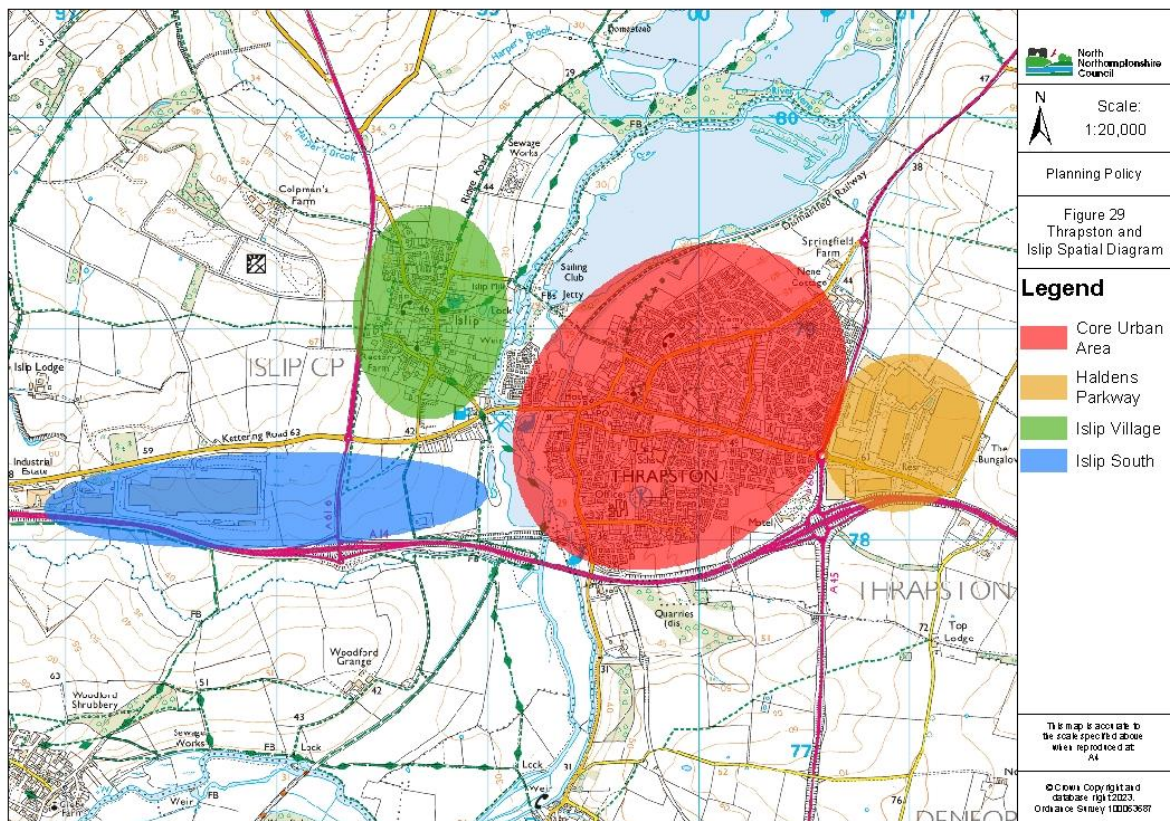


Table 26: Spatial parts of Thrapston and Islip

Spatial parts of Thrapston and Islip	Characteristics
Core urban area	<ul style="list-style-type: none"> Defined by radial arterial roads – High Street/ Huntingdon Road, Midland Road and Oundle Road Historic core based around High Street/ Huntingdon Road and Midland Road, with post-war suburban development to the north (Oundle

	<p>Road, Lazy Acre)</p> <ul style="list-style-type: none"> • Includes key services and facilities – town centre retailing, school, main public open spaces, leisure centre
Haldens Parkway (employment area)	<ul style="list-style-type: none"> • Main employment area of Thrapston, east of A605 • Major strategic warehousing and distribution site, with access to A14 and A45 Trunk Roads • Scope for further expansion of logistics or warehousing businesses, if necessary
Islip village	<ul style="list-style-type: none"> • Self contained village, with a range of services but a close functional relationship with Thrapston • Linear village, defined by Lowick Road, High Street and Chapel Hill/ Toll Bar Road
Islip south	<ul style="list-style-type: none"> • Linear area, west of River Nene, situated between Kettering Road and A14 • Major strategic employment site, including Islip Furnace and Primark premises • Linear/ ribbon development part of Islip village to the south of Kettering Road, separated from Islip village by cricket field/ Woolpack pub

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.

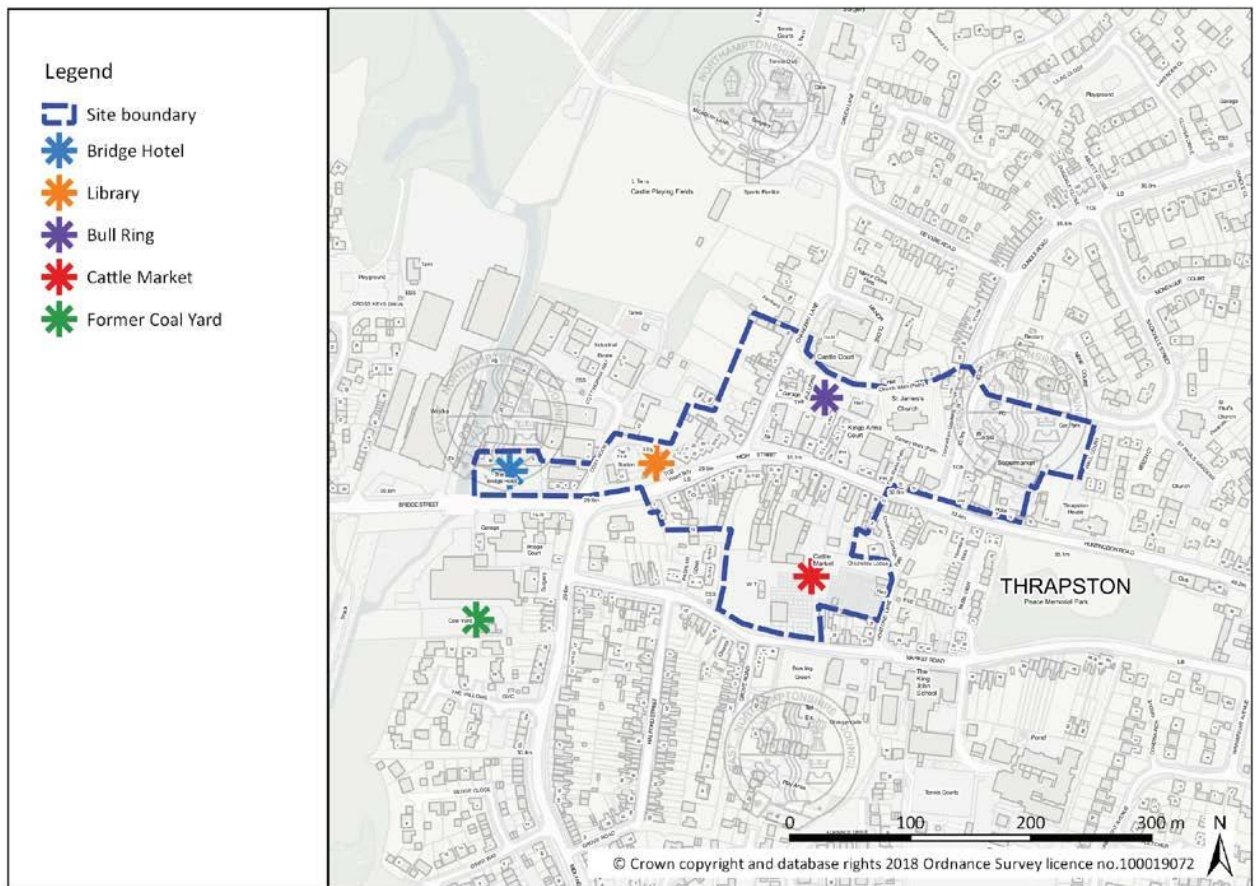
10.80 The previous Local Plan set out detailed policies for the regeneration of Thrapston, including overall principles and site specific proposals based on a 2003 Masterplan for the town, which advocated wholesale redevelopment of certain sites around the town centre.

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

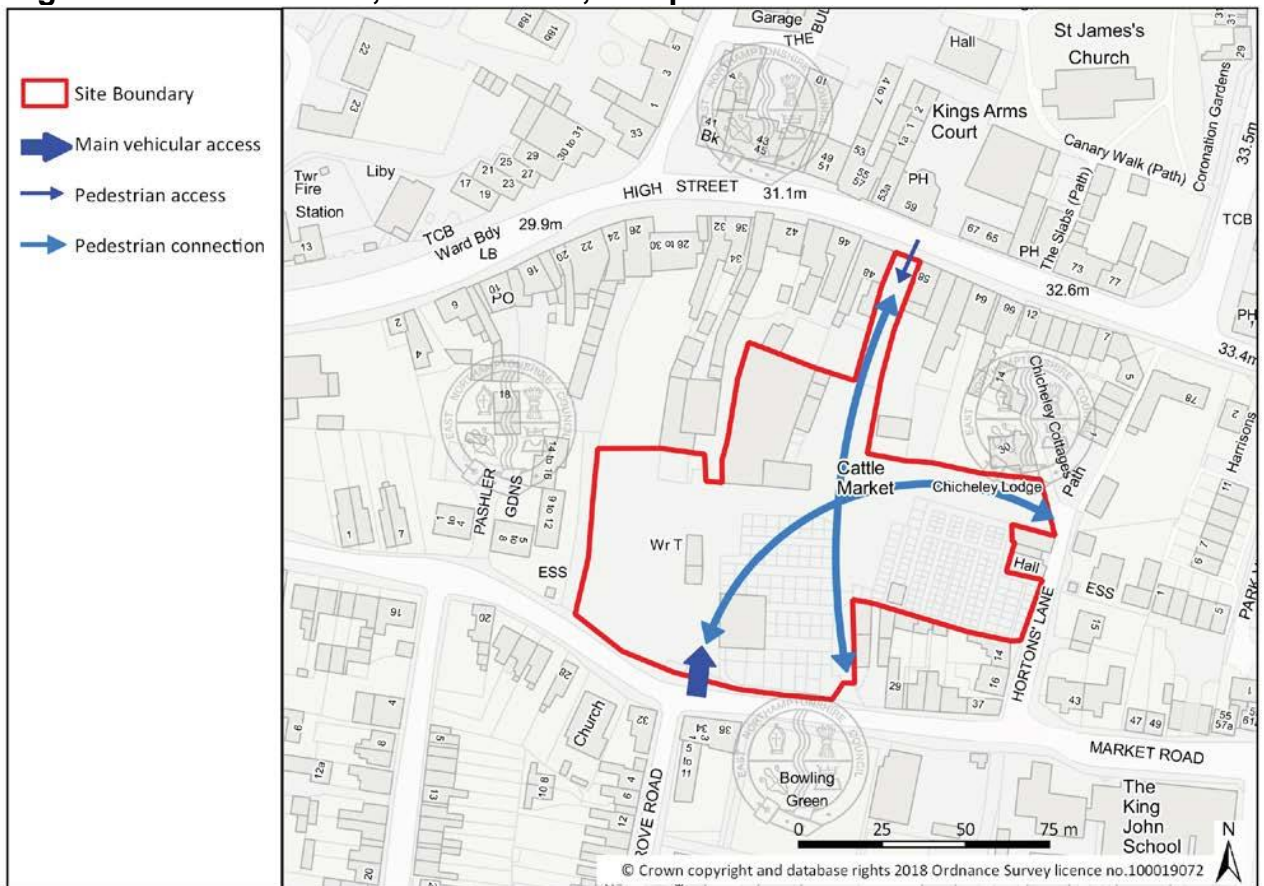
- 10.82 This Plan sets out guiding principles, to provide a framework for the re-imagination of Thrapston town centre. Previous Local Plan regeneration policies have been reviewed and incorporated into the town centre re-imagination guiding principles (Policy EN30, above).
- 10.83 Two deliverable sites, 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 authority¹³³ and national policies¹³⁴;
 - 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

¹³⁴ Planning for Schools Development (2011):

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

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 amended¹³⁵. 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 policies¹³⁶.

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

¹³⁵ <https://www.legislation.gov.uk/primary+secondary?title=community%20infrastructure%20levy>

¹³⁶ 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 Paper¹³⁷, 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

¹³⁷ <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.

Table 27: Performance indicators and targets for monitoring				
Policy	Objective	Indicator	Aims	Targets
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 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 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 New open space provided within or connected to the existing GI network 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 Completion of Greenway projects/ developments	Complete the Greenway within the district	Increase in the number of GI projects completed. 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. 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. No net loss of open

Table 27: Performance indicators and targets for monitoring				
Policy	Objective	Indicator	Aims	Targets
				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. 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 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 Maintaining Heritage Assets 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	Restrict inappropriate development which affects a designated heritage asset or its setting	Maintain existing areas designated Conservation Areas (no net loss); Maintain existing number of listed buildings (no loss) Maintain the number of Scheduled Monuments; 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 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

Table 27: Performance indicators and targets for monitoring				
Policy	Objective	Indicator	Aims	Targets
	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 Percentage of development within defined town centre boundaries Change of use of upper floors Change of use to residential (non-primary frontage) 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. Decrease the number of vacancies at upper floor level. 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 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

Table 27: Performance indicators and targets for monitoring				
Policy	Objective	Indicator	Aims	Targets
	centres		improved connectivity and do not affect local amenity	area; 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 Proportion of 1, 2, 3, 4, 5+ bed properties. 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: <ul style="list-style-type: none"> • Older persons accommodation to meet local need • Extra Care development schemes as part of major strategic sites in accordance with local needs 	Numbers of older persons (and specifically Extra Care) units of accommodation achieved on sites over and above the defined policy thresholds 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 Delivery of Extra Care housing in association with development in accordance with policy criteria at named sites: <ul style="list-style-type: none"> • Rushden East SUE • Irthlingborough West SUE

Table 27: Performance indicators and targets for monitoring				
Policy	Objective	Indicator	Aims	Targets
				<ul style="list-style-type: none"> • St Christopher's Drive, Oundle • Hayway, Northamptonton Road, Rushden • East of Ferrers School, Higham Ferrers
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

Table 27: Performance indicators and targets for monitoring				
Policy	Objective	Indicator	Aims	Targets
	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.

Table 27: Performance indicators and targets for monitoring				
Policy	Objective	Indicator	Aims	Targets
			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

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

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Ian McCluskey Associate Consultant	Nick Chisholm Batten Technical Director	Ian McCluskey Associate Consultant	Nick Chisholm Batten Technical Director

Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Name</u>	<u>Position</u>
V1	September 2023	Draft for internal review	Ian McCluskey	Associate Consultant
V2	October 2023	Final Draft	Ian McCluskey	Associate Consultant

Prepared for:

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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 29th 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 (5th Feb – 19th 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>Accessibility</p> <p>Significant positive effects 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"> • Accessibility to services and facilities from new residential developments. • Completion of Greenway projects/ developments
<p>Housing</p> <p>Significant positive effects due to support for additional housing across the HMA.</p>	<ul style="list-style-type: none"> • Net additional dwellings • Number of dwellings permitted/constructed within the different category areas of the settlement hierarchy • Affordable housing provision
<p>Health and Liveability</p> <p>Significant positive effects 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"> • Provision of accessible greenspaces • Net loss/ gain in GI across the district • Completion of Greenway projects/ developments • Amount of new sports and recreation facilities provided/ contributions secured toward facilities.

<p>Crime</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 minor positive effect 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"> • Improvement of deprivation • Improvement of crime rates
<p>Community</p> <p>Minor positive effects 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"> •
<p>Biodiversity</p> <p>The additional protections and enhancement measures are considered likely to lead to minor positive effects. This relates to the potential to strengthen ecological networks from a locally specific perspective.</p>	<ul style="list-style-type: none"> • % of nationally important wildlife sites that are in favourable condition. • Woodland access • Net loss / gain in Green Infrastructure across the borough. • Change in areas of biodiversity importance. • Net loss/ gain in GI across the district
<p>Landscape</p> <p>Though additional site allocations could lead to some minor negative effects, the broader policies in the Plan are protective and where regeneration is involved could lead to minor positive effects.</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"> • Number of permissions and refusals when policies relating to design / landscape were used to make the decision.

<p>Cultural Heritage</p> <p>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.</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"> • 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.
<p>Air</p> <p>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.</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"> • Locations close to or exceeding levels of poor air quality sufficient to warrant designation of an air quality management area.
<p>Water</p> <p>The Plan is likely to have some indirect minor positive effects through the introduction of green infrastructure and sustainable drainage.</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"> • % of river lengths assessed as having 'good' biological/ chemical quality as defined by the Water Framework Directive.

<p>Natural Hazard</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, neutral effects 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"> • Residential development permitted in Flood Zones 2 and 3.
<p>Soil and Land</p> <p>On balance, neutral effects 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"> • Number and % of new development on previously developed land. • Loss of best and most agricultural land by classification (Ha)
<p>Minerals</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, neutral effects 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"> • Hectares of development land located within mineral safeguarding areas.
<p>Energy Use and Climate Change</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 minor positive effects 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"> • Number and proportion of appropriate developments implementing SUDs and green roofs. • Permitted and Completed Renewable Energy Installations by type and area

<p>Waste</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, neutral effects are predicted.</p>	<p>Whilst no significant effects have been identified, the following indicators will be used to monitor general trends:</p>
<p>Employment, wealth creation and skills</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 significant positive effects in terms of education.</p>	<ul style="list-style-type: none"> • Total amount of new employment floorspace. • No. of net additional jobs provided by LPA on an annualised basis. • Use status/retention of existing employment sites • Completion / progress of new education facilities
<p>Town Centres</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, significant positive effects are predicted</p>	<ul style="list-style-type: none"> • Report on the quantum and scale of retail developments (m² net) approved outside of the defined town centre areas. • Change of use of upper floors • Change of use to residential (non-primary frontage) • Percentage of non-retail within primary frontages

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

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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 (m²) 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.

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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
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Introduction

MM1	Para 1.23	18	<p><i>Amend text to paragraph 1.23 as follows:</i></p> <p>Add the word bodies to second sentence after the words “specific consultation” Reword the third sentence to add the words to inform any potential 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 Areas of land located beyond tThe 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 is also adjoined by Functionally Linked Land (FLL)²². 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, 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.</p> <p><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></p>	<p>To address comments from Natural England (Reps 48/13 and 48/16)</p>

Schedule of proposed Main Modifications – March 2023

			<p><u>to be addressed through a review of the JCS, to ensure that a sustainable approach to future development proposals is agreed.</u></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 Strategy²³ applies. Policy 4 of the Joint Core Strategy and the Special Protection Area supplementary planning document, incorporating the Mitigation Strategy (November 2016)²⁴ 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><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) guidance¹.</u></p>	
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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. The masterplan will define the development boundaries and policy expectations for the SUE.</p>	Factual Update
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¹ https://www.east-northamptonshire.gov.uk/downloads/file/11094/emaqn_aq_and_planning_developer_guide_-_july_2018

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			An overarching vision for Rushden East was agreed by the Council on 17 July 2017 ² . Following on from this, the Council prepared the draft Rushden East Masterplan Framework Document (MFD) ³ . 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). <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>	

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, <u>for example</u>, 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 <u>Policies EN1 and EN2</u> (below) explains how the spatial development strategy should apply. <u>The policies</u> ‡ 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>	

² https://www.east-northamptonshire.gov.uk/info/200153/planning_and_buildings/1881/rushden_sustainable_urban_extension

³ https://www.east-northamptonshire.gov.uk/downloads/file/11671/draft_masterplan_framework_document_-_january_2020

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		<p>Future d 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) <u>along with local considerations for assessing development proposals set out below and through Policy EN2 and the supporting text.</u> 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><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></p> <ol style="list-style-type: none"> 1. Urban Areas <ol style="list-style-type: none"> a) Rushden and Higham Ferrers – 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 (<u>Policy EN28</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. b) Irthlingborough, Raunds and Thrapston – <u>Higham Ferrers, Irthlingborough, Raunds, Thrapston and Oundle</u> 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. <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> 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. c) Oundle – <u>At Oundle, D</u> development will be directed towards delivering the outstanding allocations. Further development proposals, <u>proposals will seek to deliver the allocated sites</u> to meet the Joint Core Strategy requirements for the latter half of the Plan period (2021-2031), 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. 	<p>Hearings outcome Action Point 12</p> <p>Hearings outcome Action Points 13,14, 15</p> <p>To address comments from Francis Jackson</p>
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		<p>2. Freestanding Villages</p> <p>a) To support help maintain and strengthen local services at the eight larger villages (Table 4), small scale infill and windfall development infill development opportunities within the existing built up areas (footnote 50 deleted) will be supported, 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. Further development of an appropriate scale will be supported, where it can be demonstrated that this is necessary to fulfil a defined local need Further Ddevelopment beyond the extent of the built-up area will be resisted, unless promoted allocated through a Neighbourhood Plan.</p> <p>b) 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.</p> <p><u>Within the eight larger freestanding villages (Table 4) larger scale ⁴development opportunities may be supported where it can be demonstrated that they are necessary to fulfil a defined local need- ⁵and 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></p> <p>3. Open countryside and restraint villages</p> <p>a) 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</p>	Homes (Rep 21/01)
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⁴ 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.

⁵ 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.

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			<p>diversification or the appropriate 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.</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 appropriate 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.</p>	
MM7	Para 4.31	58	<p><i>Amend the sub heading to this section of text at para 4.31</i></p> <p>Settlement boundaries – differentiating between built up areas and the countryside Defining Built-up areas</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 development principles settlement boundary criteria in together with the supporting text to 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><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></p> <p><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></p>	To reflect changes to the spatial policies.

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			<p><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></p> <p><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></p> <p><u>a) existing employment use, caravan sites, cemeteries, churchyards and leisure use including sport and recreation</u></p> <p><u>b) freestanding built structures, including farmyards and associated agriculture buildings</u></p> <p><u>c) open spaces and allotments</u></p> <p><u>d) isolated properties or areas of ribbon development which are physically and visually detached from the main built form.</u></p>	
MM9	Policy EN2	59	<p><i>Policy EN2 is deleted in its entirety and replaced with the following policy:</i></p> <p>Policy EN2 Settlement boundary criteria –urban areas</p> <p>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:</p> <p>a) Small in scale, relative to an otherwise built up frontage;</p> <p>b) Well related to the urban area (existing or committed);</p> <p>c) Clearly distinct from the countryside physically and visually;</p> <p>d) Bounded by compatible development (existing or committed);</p> <p>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);</p> <p>f) Unlikely to be of any beneficial use as open land, including for agriculture, or;</p> <p>g) Committed for development by way of an extant planning permission or development plan allocation.</p>	To reflect changes to the spatial policies.

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			<p><u>Policy EN2 Development Principles</u></p> <p><u>Development proposals will be generally supported where they meet the following requirements/criteria:</u></p> <p><u>(i) The site is allocated in the Local Plan or a made Neighbourhood Plan;</u></p> <p><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></p> <p><u>(a) well-related to the principal built-form of the settlement (existing or committed) and is not protected for any other use;</u></p> <p><u>(b) clearly distinct from the surrounding countryside, both physically and visually;</u></p> <p><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></p> <p><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></p> <p><u>(iv) They would not be disproportionate to the settlement's size, form and range of facilities available.</u></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 Policy EN3 criteria (below) <u>EN2 and the supporting text.</u></p>	To reflect changes to the spatial policies.

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			<p>These criteria should be applied in managing small scale and/or residential infilling at the periphery of villages. 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.</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>Policy EN3 Settlement boundary criteria- freestanding villages (Table5)</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"> a) 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>: b) 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>: c) public open spaces on the edge of villages are <u>excluded</u>: d) residential curtilages, where these are bounded by existing built curtilages on fewer than two sides, are <u>excluded</u>: and e) 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>. 	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>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</p>	To reflect changes to the spatial policies.

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			<p><i>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.</i></p> <p><i>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:</i></p> <ul style="list-style-type: none"> <i>• Lower Crow Hill (Addington Road, Irthlingborough); and</i> <i>• Brooks Road, Raunds.</i> <p><i>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.</i></p>	
MM13	Policy EN4	61	<p><i>Delete Policy EN4 in its entirety:</i></p> <p><i>Policy EN4 Settlement boundary criteria–ribbon developments</i> <i>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;</i></p> <ul style="list-style-type: none"> <i>a) is bounded by existing built curtilages on at least two sides;</i> <i>b) has a frontage to the highway and a depth similar to adjoining residential curtilages</i> <i>c) does not extend the built form away from the main highway to create a “backland” form of development; and</i> <i>d) has regard to positive local character and distinctiveness.</i> 	To reflect changes to the spatial policies.
MM14	Policy EN5	63	<p><i>Amend Policy EN5 title and policy as follows:</i></p>	To reflect changes to the

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			<p>Policy EN5 Development on the periphery of settlements with a defined settlement boundary and rural exceptions housing.</p> <p>Beyond the <u>extent of the built up area</u> defined settlement boundaries, as defined <u>in the supporting text to</u> by policies Policy EN2—EN4 (or defined, <u>by a settlement boundary</u>, within a made Neighbourhood Plan), new build residential development will not generally be supported. However, proposals for rural diversification, the re-use or conversion of rural buildings, or rural exceptions housing schemes will be supported⁶. where it fulfils the relevant development plan policies.</p> <p>In recognition of the rural nature of the district the following criteria will apply when taking into account assessing the suitability of settlements to provide for rural exceptions housing on the periphery of settlements:</p> <ul style="list-style-type: none"> a) the proposed development will encourage the promotion of would assist in supporting services in the settlement or assist in supporting services which are provided in neighbouring settlements, and or in a cluster of nearby settlements⁷ 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 even though services may be restricted evidenced by a local needs housing survey 	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"> a) The original dwelling has not been abandoned or allowed to fall 	To reflect changes to the spatial policies.

⁶ 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.

⁷ 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.**

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			<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 seen visible, 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 (<u>to be assessed having regard to the latest applicable national space standards</u>), the floor space may be increased <u>to meet nationally described space standards</u>, 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 the wider character area, <u>taking into account any wider impact of the development in its general location.</u></p> <p>Conditions or unilateral undertakings <u>will</u> should 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 Action Point 22</p> <p>(f)Hearings Action Point 23</p> <p>Hearings Action Point 24</p>
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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; 0.53 ha or more for housing schemes; or more than 1000m² 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
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		<p><i>Add two new paragraphs after paragraph 5.12 as follows:</i></p> <p><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></p> <p><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></p> <p><i>Amend the Figure 7: Priority Green Infrastructure Corridors Legend as follows:</i></p> <p><u>New</u>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. <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></p>	
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MM17	Policy EN7	70	<p><i>Amend EN7 Policy title as follows:</i></p> <p>Policy EN7: <u>Local</u> Green Infrastructure corridors</p> <p><i>Amend Policy EN7 as follows:</i></p> <p><u>Local</u> Green Infrastructure corridors are identified on the Policies Map and Figure 7. These <u>local</u> corridors will be protected and enhanced by <u>through development proposals</u>. <u>Development proposals will be expected to:</u></p> <ul style="list-style-type: none"> a) Ensuring that, <u>where opportunities exist</u>, new development, including open space, is connected to the <u>Local</u> Green Infrastructure network, <u>this includes the local GI corridors and the wider Green Infrastructure network</u>; b) Ensuring, <u>through the design and layout of schemes</u>, 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 <u>existing and proposed</u> Green Infrastructure network; and d) <u>Requiring sites of 10 dwellings or more (or 0.5ha or more) and commercial sites of 1000m² 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> <p>Opportunities to create the following <u>local</u> Green Infrastructure corridors and incorporate them into the wider Green Infrastructure network will be supported:</p> <ul style="list-style-type: none"> i) Duddington – Gretton (via Wakerley Woods) ii) King’s Cliffe – Wansford iii) Blatherwycke – Fotheringhay iv) Brigstock – Fotheringhay (via Glaphorn Cow Pasture and Lower Benefield) 	<p>Hearings Action Point 141, 142, 143, 144, 145, 146</p>
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			<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 and equestrian users where appropriate and to provide opportunities for informal recreation.</p> <p><i>Add new paragraph after paragraph 5.17 as follows:</i></p> <p><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></p> <p><i>Remove Unsuitable Greenway Routes from Figure 8: The Greenway and amend the Legend as follows:</i></p> <p>Unsuitable Greenway Routes</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 routes, both existing and proposed, as identified on the Policies Map and figure 8 above, comprise a priority Green Infrastructure project for the Council, requiring both investment and improvement to ensure its satisfactory delivery. <u>This includes the</u></p>	To address Historic England comments. (Rep. 39/03 and SOCG)

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			<p><u>aspirational connections, where opportunities will be explored within the areas delineated by the dashed lines on the Policies Map and Figure 8.</u></p> <p>Development should; therefore</p> <ol style="list-style-type: none"> a. be designed to protect and enhance the Greenway, and to strengthen connections to the wider green infrastructure network within the District; b. <u>Its development must protect and enhance heritage assets and their settings; and</u> c. <u>on residential developments of 10 or more dwellings (or sites more than 0.5ha) and commercial sites of 1000m² 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> <p>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 contributions⁶² and additional funding streams where appropriate.</p> <p><u>Future maintenance of the Greenway and especially the area that adjoins it should be secured.</u> 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. <u>Developers should work with the Council to determine the most appropriate future maintenance arrangements.</u></p> <p><u>Footnote 62:</u> 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 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>

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			<p>In accordance with the National Planning Policy Framework guidance, Local Green Space may be designated through Neighbourhood Plans, where <u>it has been identified by the community and</u> it fulfils the following criteria:</p> <p>a) The site is closely related to the main built up area of a <u>the</u> settlement <u>it is intended to serve</u>;</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"> i) Defining the setting of a built up area ii) Archaeological or historical interest, including tourism related activities iii) Recreational importance iv) Tranquillity, or v) biodiversity; and <u>vi) beauty; and</u> <p>c) The gross area of the site does not exceed 0.5 ha or 10% of the <u>should be proportionate to the</u> existing main built up area of the settlement, whichever is larger. <u>and not an extensive tract of land.</u></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 <u>or any subsequent updates</u>). The KKP study should also be utilised in conjunction with other targeted investment strategies such as the Local Football Facility Plan (March 2020).</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 <u>0.35</u> 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>

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		<p>developer contributions towards the provision and enhancement of open space which is suitable for children and younger people as well as older people. <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></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 via <u>through Policy EN33 and informed by</u> 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><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></p> <p><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></p> <p><i>Amend footnote 69 as follows:</i></p> <p>The figure of 0.04 ha per 1000 population is a minimum. For the Rushden East SUE, the amount of provision will be dealt with via the Masterplan Framework Document.</p>	
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MM22	Policy EN10	79	<p><i>Amend Policy EN10 as follows:</i></p> <p>With the exception of the Rushden East Sustainable Urban Extension, aAll 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 <u>an identified quantitative and/ or qualitative need. Requirements will be determined in accordance with the most up-to-date evidence base</u> insufficient access to existing open space identified within the local area⁷⁰. Where applicable, new open space will need to be provided in order to meet the following requirements <u>(or subsequent updates to these requirements set out in the most up-to-date evidence base):</u></p> <ul style="list-style-type: none"> • Quality and value criteria in Table 6; • Accessibility standards in Table 7; and • Quantity standards in Table 8. <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. (Appendix 6).</p> <p>For all other qualifying development, contributions to enhance the quality and value of existing open space <u>onsite, or where appropriate offsite</u>, 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. This will be delivered by way of either adoption of the open space by the</p>	<p>To address Bellway Homes comment. (Rep. 26/02 and SOCG)</p> <p>Hearing Action Points 161, 162, 167, 168</p>
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			<p>relevant Town/ Parish Council, or the setting up of a management company. <u>Developers should work with the Council to determine the most appropriate long term management and maintenance arrangements.</u></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><u>Sport and Recreation</u></p> <p>Delete figure 9, footnote 71 and heading as follows:</p> <p>Figure 9: Playing Pitch Strategy and Action Plan – North and South areas⁷²</p> <p>Footnote 71 : KKP Playing Pitch Assessment, Figure 1.1</p> <p>Delete Table 9 as follows:</p> <table border="1" data-bbox="669 940 1818 1340"> <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 1.5 youth (9v9) match sessions</td> <td>0.5 adult match sessions 2.5 youth (11v11) match sessions 2.5 youth (9v9) match sessions</td> <td>0.25 adult pitches 2 youth (11v11) pitches 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 1.5 youth (9v9) match sessions	0.5 adult match sessions 2.5 youth (11v11) match sessions 2.5 youth (9v9) match sessions	0.25 adult pitches 2 youth (11v11) pitches 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 1.5 youth (9v9) match sessions	0.5 adult match sessions 2.5 youth (11v11) match sessions 2.5 youth (9v9) match sessions	0.25 adult pitches 2 youth (11v11) pitches 2 youth (9v9) pitches															

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				South	2.5 adult match sessions 1 youth (11v11) match sessions 0.5 youth (9v9) match sessions	4 adult match sessions 5 youth (11v11) match sessions 4.5 youth (9v9) match sessions	3.25 adult pitches 3 youth (11v11) pitches 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 3 mini match sessions	-	2.25 senior pitches 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 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</p>						

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			<p>enhancement of <u>sport and recreation facilities</u> playing pitches or make provision for these on site.</p> <p><i>Add new paragraph after 5.36 as follows:</i></p> <p><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></p>	
MM24	Policy EN11	84	<p><i>Amend Policy EN11 as follows:</i></p> <p>For a<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> contributions to enhance the quality and value of existing <u>sports and recreation facilities</u> playing pitches within the locality <u>and/or create new facilities to meet needs arising from the development.</u> 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. <u>most up-to-date evidence base.</u></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 justified⁷³.</p> <p><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></p>	Hearing Action Points 171, 172, 173, 174, 175, 176

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			<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 <u>sport and recreation facilities</u> playing pitches must be secured. This will be delivered by way of either adoption of the open space by the relevant <u>authority</u> Town/ Parish Council, or the setting up of a management company. <u>Developers should work with the Council to determine the most appropriate long term management and maintenance arrangements.</u></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>	
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Social Capital

MM25	Paras 6.10-6.11	87	<p><i>Amend paragraph 6.10 (6th bullet point), as follows:</i></p> <p>Movement and access - providing infrastructure to encourage and enable access for all by prioritising <u>non-motorised means of transport such as</u> walking, cycling and <u>horse riding, together with</u> 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 references⁷⁵. <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></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>
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			<u>applications/ proposals to be prepared in line with the latest EMAQN guidance [link to document already provided at section 1].</u>	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 <u>design and</u> place shaping principles; 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;</p> <p>b) Creating a distinctive, high quality and accessible public realm which promotes and encourages physical activity and social engagement;</p> <p>c) Giving due consideration <u>Having regard</u> 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 (<u>or replacement body</u>), to inform proposals relating to healthcare provision and / or access; and</p> <p>e) Undertaking Health Impact Assessments at an early stage <u>to ensure HIA influences</u> in the design process, <u>for example, through pre-application advice,</u> to ensure that the issues identified can be addressed or incorporated into the design proposals, in accordance with <u>and have regard to</u> the Northamptonshire Planning and Health Protocol.</p> <p>Health Impact Assessments will need to be objective and proportionate, dependent upon the scale of development proposed⁷⁸. <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 1000m² or more) will need to be accompanied by an appropriate HIA.</u></p> <p><i>Delete footnote 78 as follows:</i></p>	Hearings Action Points 122, 123, 124, 125, 126, 127

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			As a guide, HIAs for large major development (say, 100 dwellings + or 5000m ² 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"> 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 <u>proportionate to the scale of the unit</u> of an adequate size for the property and space for waste management to serve the needs of all end users; f) In the case of Houses in Multiple Occupation, complies <u>have regard to</u> 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; g) For all other developments, meets the <u>provide sufficient internal space in line with</u> National Space Standards as referred to in Criterion (b) of Policy 30 of the Joint Core Strategy; <u>and</u> h) Includes parking provision in line with the Countywide parking standards and, where appropriate, incorporates charging points for electric vehicles; and where appropriate, incorporates charging <u>charging</u> points for electric vehicles; and 	<p>Hearings Action Points 128, 129, 130, 131</p> <p>To address Bellway comment (Rep. 26/03</p>

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			<p>i) Does not result in unacceptable problems of significant harm arising from 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 Conservation Area or a registered Historic Park and Garden or archaeological remains, great weight will be given to the asset's conservation.</p> <p>Development proposals that sustain 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.</p> <p>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:</p> <p>a) the importance of the asset; b) the scale of harm; and c) where the nature and level of the public benefit of the proposal demonstrably outweighs the harm or loss.</p> <p><u>Where development:</u></p> <p>a) <u>protects and enhances heritage assets (including non-designated assets) and prevents harm to their significance and setting;</u> b) <u>has been informed by a conservation area appraisal, landscape character assessment, village design statement of neighbourhood plan;</u> c) <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> d) <u>conserves, protects and enhances heritage assets that are considered to be at risk.</u></p>	<p>Hearings Action Points 132, 133, 135</p> <p>To address Historic England's concerns. (Rep 39/04 SOCG)</p>

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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 (below) sets out further guiding principles for preparing local lists. This is supported by Table 10 (below), which and 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">Table 10: Criteria for deciding whether a building/ site/ structure should be considered as a non-designated heritage asset</th> </tr> <tr> <th data-bbox="667 671 1021 707">Type of asset</th> <th data-bbox="1021 671 1854 707">Criteria for selection</th> </tr> </thead> <tbody> <tr> <td data-bbox="667 707 1021 1129">Historic parks and gardens</td> <td data-bbox="1021 707 1854 1129"> <ul style="list-style-type: none"> ● 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 </td> </tr> <tr> <td data-bbox="667 1129 1021 1343">Buildings and structures</td> <td data-bbox="1021 1129 1854 1343"> <ul style="list-style-type: none"> ● Aesthetic/architectural merit ● Historic association ● Age and rarity ● Completeness ● Social or communal value </td> </tr> </tbody> </table>	Table 10: Criteria for deciding whether a building/ site/ structure should be considered as a non-designated heritage asset		Type of asset	Criteria for selection	Historic parks and gardens	<ul style="list-style-type: none"> ● 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	<ul style="list-style-type: none"> ● Aesthetic/architectural merit ● Historic association ● Age and rarity ● Completeness ● Social or communal value 	Hearings Action Point 135
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			Assets of archaeological interest	This Plan will follow the clarification provided by the Planning Practice Guidance ⁸⁸ and Historic England guidance on Local Heritage Listing ⁸⁹ 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 asset⁹⁹ <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> 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>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.</p> <p><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></p> <p>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. Table 10: <u>Whether a site, feature or structure is considered to be a non-designated heritage asset will be guided by the following criteria:</u></p> <p><u>Historic parks and gardens</u></p> <ul style="list-style-type: none"> • <u>Historic interest</u> • <u>Proportion of the original layout still in evidence</u> • <u>Influence on the development of taste whether through</u> 	<p>To address comments from the National Trust (Rep 27/01)</p> <p>Hearings Action Points 135, 136</p>	

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			<p><u>reputation or reference in literature</u></p> <ul style="list-style-type: none"> • <u>Early or representative of a style of layout</u> • <u>Work of a designer of local importance</u> • <u>Association with significant persons or historical events</u> • <u>Strong group value</u> • <u>Within, or contributing to, a locally significant landscape</u> <p><u>Buildings and structures</u></p> <ul style="list-style-type: none"> • <u>Aesthetic/architectural merit</u> • <u>Historic association</u> • <u>Age and rarity</u> • <u>Completeness</u> • <u>Social or communal value</u> <p><u>Assets of archaeological interest</u></p> <ul style="list-style-type: none"> • <u>This Plan will follow The clarification provided by the Planning Practice Guidance⁸⁸ and Historic England guidance on Local Heritage Listing⁸⁹ 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> <p><i>Delete footnote 90 as follows:</i> 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. <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> 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)

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			<p><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></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"> i. Are acceptable in terms of highways access, subject to compliance with other relevant policies; ii. 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; iii. Do not have a significant impact upon other types of designated and non-designated biodiversity sites; iv. i. Deliver enhanced connectivity to the Greenway and other defined Green Infrastructure corridors, as referred to in policies EN7 and EN8; and v. 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)). <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>

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			<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 this fulfils the following criteria, whereby:</p> <p>i) Special regard shall be given to parking provision and the impact upon the amenity of neighbouring properties;</p> <p>ii) 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,</p> <p>iii) 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 accommodation⁹³.</p> <p><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 accommodation⁹³.</u></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><i>New school proposal, Chelveston Road, Higham Ferrers</i></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 2020⁵). 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 has beenwill be 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 <u>which opened in September 2021.</u></p>	Hearings Action Points 139 & 140

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		<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>Figure 11: Sports Masterplan, Newton Road, Higham Ferrers (Planning Policy Committee, 20 January 2020, Item 6, Appendix 3)</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>	
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			<p>development of new community facilities (including education) where appropriate (Policy HF.CD2).</p> <p>Delete Figure 12 and title as follows:</p> <p>Figure 12: Land to the west of Moulton College, Higham Ferrers</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"> a) Development of a school building and associated on-site infrastructure; b) Main vehicular and pedestrian access off Chelveston Road (north); 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); d) Sufficient car parking and associated on-site servicing to meet the needs of students, employees and visitors; and 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. 	Hearings Action Point 139

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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 target 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><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></p> <p><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 enterprises comprise less than 250 employees. In addition to small and mid-size companies, there are micro-companies, which employ up to 10 employees.</u></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 <u>for Small and Medium-sized enterprises</u></p>	<p>Hearings Action Point 80,81</p>

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			<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, medium and micro-businesses. Such projects should:</p> <ul style="list-style-type: none"> 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 Parking Standards¹¹³; c) Deliver pedestrian, cycle and public transport connections to adjacent businesses, residential areas and public open spaces, to maximise integration with the surrounding locality¹¹⁴; 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. 	
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 use¹¹⁷. Proposals for re-development or changes of use of existing buildings should ensure that the overall provision of employment on the site after development is no less than that of the current or most recent use. A reduction in the level of employment net job numbers/employment land or development for non-employment uses can only be supported where it can be demonstrated that:</p> <ul style="list-style-type: none"> a) There is no realistic prospect of the site or buildings being used or re-used, including redevelopment, for employment purposes¹¹⁸; and/or 	<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>

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			<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; and</p> <p>e) Development contributions will be made to support economic development across the district¹¹⁹.</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><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></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 will be supported, provided that these do not result in unacceptable impacts upon the amenities of neighbouring properties. <u>or for businesses that need to relocate, will be supported where they meet the following criteria:</u></p> <p>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:</p> <p>a) Is adjacent to an existing built up area, provided that <u>and</u> that there is no significant impact on the countryside, or character of the surroundings, <u>ecology, highways, the character of the surroundings or the amenity of neighbouring properties;</u></p> <p>b) Would not result in a significant impact on the countryside, ecology, highways, the character of the surrounding sand the amenity of neighbouring or nearby properties:</p>	Hearings Action Point 86

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			<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) b) For main town centre uses, if applicable, meets the requirements of the sequential and impact tests; and</p> <p>e) c) 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/ frontage (since 2012 NPPF)</p> <p>Add new text after para 7.56:</p> <p><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></p> <p><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></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>

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			<p>Development within the town centre boundaries <u>of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds⁸ and Thrapston</u>, 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 <u>where appropriate</u> some of the following:</p> <ul style="list-style-type: none"> a) At street level, maintaining a balance and mix of main town centre uses, including both convenience and comparison retailing, financial services and/ or food and drink businesses; 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 <u>town centre use</u>Use Class, with the exception of retailing; d) Retaining a predominantly retail offer for the defined <u>primary shopping frontages, as shown on the policies map;</u> 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 <u>regeneration</u>development 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. 	<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 <u>town centre boundaries</u> primary shopping areas of the six town centres <u>Rushden, Higham Ferrers, Irthlingborough, Oundle,</u></p>	<p>To ensure the geographical application is illustrated on the policies map.</p>

⁸ In Raunds this applies to development within the Primary Shopping Area defined through the Neighbourhood Plan

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			<p>Raunds⁹ and Thrapston, as shown on the policies map, should be supported by an appropriate impact assessment, where the following floorspace thresholds are exceeded:</p> <p>a) Rushden <u>Town Centre</u> 280m²; and</p> <p>b) Market Towns <u>Centres</u> 100m².</p> <p>Impact assessments and Sequential tests should be prepared in accordance with the relevant national guidance¹⁰. Failure to demonstrate there will be no significant adverse impact would result in a refusal of planning permission.</p>	Hearings Action Points 97, 98, 99, 100, 101
MM44	Supporting text to Policy EN23	129	<p><i>Add new text after paragraph 7.76 as follows:</i></p> <p><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></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>Policy EN23: Development of main town centre uses around the Local Centres</p> <p>For <u>Proposals of a scale and type limited to serving the immediate local area, minor development schemes¹⁴ which are adjoining or closely related to</u> within 200m¹² of the designated local centres, <u>as set out below and shown on the policies map, will be</u></p>	To ensure it is clear that the geographical application is illustrated on the policies map. Hearings

⁹ In Raunds this applies to development outside the Primary Shopping Area defined through the Neighbourhood Plan

¹⁰ 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>

¹⁴ Minor schemes are those of less than 1000m² floorspace; the national standard threshold for major planning applications

¹² 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.

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			<p>supported for, there will be a general presumption in favour of the following types of 'main town centre' uses:</p>	<p>Action points 102, 103, 104,105, 106, 107</p>
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		<ul style="list-style-type: none"> • Convenience retailing; • Financial services; • Community facilities; • Eating and drinking establishments; and • Local leisure facilities. <p><u>Designated Local Centres:</u></p> <ul style="list-style-type: none"> • <u>London Road/ Michael Way, Raunds</u> • <u>High Street South, Rushden</u> • <u>Wellingborough Road, Rushden</u> • <u>Grangeway Shopping Precinct, Rushden</u> • <u>2-12 Blackfriars, Rushden</u> • <u>Rushden East SUE</u> • <u>Hall Hill/ High Street, Brigstock</u> • <u>High Street, Ringstead</u> • <u>Church Street/ High Street, Stanwick</u> • <u>High Street/ The Green, Woodford</u> <p>Such proposals will be supported, provided that they:</p> <ol style="list-style-type: none"> 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; <p><u>Permitted developments rights may be removed where exceptional circumstances are considered to exist.</u></p> <ol style="list-style-type: none"> d) Are subject to the removal of permitted development rights to prevent changes of use in appropriate circumstances; and e) Are justified by means of an impact assessment where proposals are over the 	
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			<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>	
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Housing Delivery

MM46	Para 8.3	132	<p><i>Add the following text after paragraph 8.3:</i></p> <p><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></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><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></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 89 years of the Plan period (2011-20192020). Alongside these, a large number of smaller development sites have</p>	To update with 2020 monitoring information.

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		<p>also come forward; these are included in the latest (20192020) 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 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 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>2,500 2,700</td> <td>1,200 1250</td> <td>1,300 1450</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	2,500 2,700	1,200 1250	1,300 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		
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¹³ 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/downloads/download/5073/2020_annual_position_statement

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			Irthlingborough	West of Huxlow School/ Irthlingborough West	700	250 200	450 500	N/a - Resolution to grant	Strategic site/ SUE	Commitment on basis of (now defunct) 2008 Core Spatial Strategy of JCS Annex A
			TOTAL	Major urban extensions	3,500 3,700	1,750	1,750 1,950			
<p><i>Amend paragraph 8.7 as follows:</i></p> <p>As at 1 April 20192020, 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"> • Completions, 1 April 2011 – 31 March 20192020; • Commitments (i.e. extant planning permissions or previously allocated sites), as at 1 April 20192020 (20192020 AMR, Housing Site Schedule); • Major development sites (Table 1655, above) plus other emerging proposed development sites identified in the 20182020 AMR Housing Site Schedule). <p><i>Amend table 16 as follows:</i></p>										

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		Table 16: Urban areas residual housing requirement, as at 1 April 2019 2020						
	Housing requirement (2011-31)	Completions 2011-1819	Completions 2019-1920	% housing requirement delivered as at 31 March 201920	Commitments (starts and planning permissions) as at 1 April 201920	Commitments (resolutions to grant, Development Plan allocations, Rushden East) as at 1 April 201920	Residual requirement as at 1 April 201920 (committed sites deducted)	
Growth Town								
Rushden	3,285	953 1,036	83 19	31.5% 32.1%	63 175	1,760 1,515	426 540	
Market Towns								
Higham Ferrers	560	358 370	12 4	66.1% 66.8%	4 3	300	-114 -117	
Irthlingborough	1,350	283 320	37 27	23.7% 25.7%	171 149	329 280	530 574	
Raunds	1,060	387 662	275 47	62.5% 66.9%	466 347	0	68 4	
Thrapston	680	190 202	12 223	29.7% 62.5%	486 260	0	-8 -5	
Oundle	645	384 392	8 3	60.8% 61.2%	7 11	70	176 169	
TOTAL	7,580	2,555 2,982	427 323	39.3% 43.6%	1,197 945	2,459 2,165	942 1,165	
<i>Amend and split paragraph 8.9 as follows:</i>								

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		<p>Table 16 shows that as at 1 April 201920 JCS housing requirements for Higham Ferrers, Raunds and Thrapston are being met, through housing completions (1,234799) and housing commitments (1,256563). <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></p> <p>Outstanding residual housing requirements have been identified at Rushden (426540 dwellings), Irthlingborough (530574 dwellings) and Oundle (476169 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 <u>updated (2020)</u> urban housing Background Paper (BP9)¹⁴.</p> <p><i>Amend paragraph 8.10 as follows:</i></p> <p>For Rushden, commitments consist of extant planning permissions (63 dwellings and <u>plus outstanding</u> Neighbourhood Plan site allocations (560 <u>total 315</u> dwellings); with 4,200 <u>1,050</u> dwellings at Rushden East anticipated to be delivered by 2031. This equates to an outstanding requirement for 426 <u>540</u> dwellings. A further 420 <u>134</u> dwellings housing land supply is identified at specific unallocated brownfield sites within the urban area, equating to a residual requirement for 306 <u>406</u> dwellings.</p> <p><i>Amend paragraph 8.11 as follows:</i></p> <p>For Irthlingborough, commitments for 500 <u>429</u> dwellings are identified within the 2019 <u>2020</u> housing land supply. A further 207 <u>199</u> dwellings is included within the housing land supply, consisting of specific brownfield sites and other emerging sites which did not, as at 1 April 20192020, have planning permission. These emerging sites reduce the residual requirement to 323 <u>375</u> 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 250 <u>200</u> (out of 700) dwellings are now anticipated to come</p>	
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¹⁴ https://www.east-northamptonshire.gov.uk/downloads/file/12110/background_paper_9_-_housing_requirements_-_urban [link to updated BP9 to be added]

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		<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 476169 dwellings at Oundle is identified, where additional strategic land allocations are required to meet this target. This residual figure for 476169 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 246239 dwellings¹⁵, 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 20192020.</p> <p><i>Amend Table 17 as follows:</i></p> <table border="1" data-bbox="645 874 1850 1262"> <thead> <tr> <th>Table 17: Rural areas residual housing requirement, as at 1 April 20192020</th> <th>District rural housing requirement 2011-31</th> </tr> </thead> <tbody> <tr> <td>JCS rural housing requirement 2011-31</td> <td>820</td> </tr> <tr> <td>Rural housing completions 2011-4819</td> <td>-467-513</td> </tr> <tr> <td>Rural housing completions 201819-1920</td> <td>-46-65</td> </tr> <tr> <td>Extant planning permissions as at 1 April 20192020 (as shown in 20192020 AMR housing site schedule)</td> <td>-171 -124</td> </tr> <tr> <td>Local Plan/ Neighbourhood Plan site allocations (as at 1 April 20192020)</td> <td>-90-136</td> </tr> <tr> <td>Emerging Neighbourhood Plan site allocations, other emerging rural sites (>4 dwellings), as at 1 April 20192020</td> <td>-89 -58</td> </tr> <tr> <td>RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL 20192020</td> <td>-43-76</td> </tr> </tbody> </table>	Table 17: Rural areas residual housing requirement, as at 1 April 20192020	District rural housing requirement 2011-31	JCS rural housing requirement 2011-31	820	Rural housing completions 2011- 48 19	-467 -513	Rural housing completions 2018 19 - 19 20	-46 -65	Extant planning permissions as at 1 April 2019 2020 (as shown in 2019 2020 AMR housing site schedule)	-171 -124	Local Plan/ Neighbourhood Plan site allocations (as at 1 April 2019 2020)	-90 -136	Emerging Neighbourhood Plan site allocations, other emerging rural sites (>4 dwellings), as at 1 April 2019 2020	-89 -58	RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL 20192020	-43 -76	
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¹⁵ 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.

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			<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 4376 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 updated (2020) rural housing Background Paper (BP10)¹⁶.</p> <p><i>Amend paragraph 8.15 as follows:</i></p> <p>The rural housing requirement is already delivered (513578 dwellings), committed (261260 dwellings); or allocations in Neighbourhood Plans “made” since 1 April 20192020 (35 dwellings) and other emerging rural sites (5458 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 (2019) NPPF (2021 update), which states that strategic policies should also set out a housing requirement for designated neighbourhood areas (paragraph 6566) or, at the very least, provide an indicative figure if requested by the neighbourhood planning body (paragraph 6667).</p>	
MM49	Policy EN24	138	<p><i>Policy EN24 to be deleted in its entirety as follows:</i></p> <p>Policy EN24: Oundle Housing Allocations</p> <p>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:</p> <ul style="list-style-type: none"> i) Land rear of Cemetery, Stoke Doyle Road ————— around 70 dwellings; ii) Cotterstock Road/ St Peter’s Road ————— around 130 dwellings; and iii) St Christopher’s Drive ————— around 100 dwellings. 	Hearings Action Point 45

⁶ https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10_-_housing_requirements_-_rural [Link to updated BP10 to be added]

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			<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"> a) transport impact – including vehicular access points, visibility, pedestrian and cycle links and impact on the existing road network; b) amenity – impact of existing uses and operations upon new development, including issues noise, odours and air quality; c) impact upon community infrastructure; e.g. schools and NHS services; d) impact on the surrounding landscape and street scene, to be addressed through site design, mix and layout; e) the management of water resources – flood risk, drainage, water supply and sewerage; f) impact on designated and non-designated heritage assets and their settings; and g) biodiversity impacts. 	
MM50	Supporting text to Policy EN25	139 and 140	<p><i>Add new text after paragraph 8.26, as follows:</i></p> <p><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 population¹⁷ 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></p>	To address recommendations of the HRA.

¹⁷ A significant population is classified as a site that regularly used by more than 1% of the population of qualifying bird species

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			<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>	
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><u>Site Specifics</u></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"> 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, in line with other policy requirements. 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. <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>Therefore, it is necessary for this Plan to set a policy framework for managing the detailed development proposals. Detailed development proposals will need to address these</p>	To address comments from Anglian Water (Rep 22/05)

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			<p><u>matters and other site-specific constraints.</u></p> <p><i>And insert a new paragraph as follows:</i></p> <p><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></p>	
MM54	Policy EN26	143	<p><i>Amend Policy EN26 criterion d) as follows:</i></p> <p><u>Site Specifics</u></p> <p>Land at Cotterstock Road¹⁸, 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"> 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. 	To address comments from Anglian Water (Rep 22/03, 22/04, 22/06)

¹⁸ 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

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			<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). <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></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) <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure.</u></p>	
MM55	Policy EN27	145	<p><i>Amend Policy EN27 as follows:</i></p> <p><u>Site Specifics</u></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 <u>extra care provision to meet older persons' needs</u>. 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>

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			<p>vehicular access forming a continuation of St Christopher’s Drive. Consideration may be given to the provision of an emergency access via Ashton Road.</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) <u>The design and layout should consider the proximity of the foul pumping station¹⁹. to reduce the risk of nuisance/ loss of amenity associated with the operation of this.</u></p> <p><i>And add footnote:</i></p> <p><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></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 201920 AMR²⁰, indicates the following:</p> <ul style="list-style-type: none"> • Irthlingborough West – 250200 dwellings, 20267-2031; and • Rushden East – 1,2000050 dwellings, 20223-2031. <p><i>Amend paragraph 8.36 as follows:</i></p>	To update with 2020 monitoring information.

¹⁹ ***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.***

²⁰ <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/>

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			<p>The April 201920²⁰ trajectories for the two sustainable urban extensions equate to a combined reduction of 850^{1,050} 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 323³⁷⁵ dwellings and 306⁴⁰⁶ 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 629⁷⁸¹ dwellings, as at 1 April 201920²⁰).</p> <p><i>Amend paragraph 8.39 as follows:</i></p> <p>The combined shortfall for Irthlingborough and Rushden equates to greater than 500⁷⁰⁰ 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 244²⁴⁷ 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 is^{are} applied to offset the Irthlingborough and Rushden shortfall, this would give a residual requirement for 385⁴⁵⁰ dwellings across the three^{four} 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><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></p>	To address recommendations of the HRA.

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			<p><u>to determine if it does support a significant population²¹ 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></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"> Up to <u>It is expected that the proposed allocation will deliver around</u> 450 dwellings; 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); 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; To maximise opportunities to improve connectivity to, and enhance the quality of, the public rights of way network; in particular: 	To address comments from Bellway Homes (Rep 26/05)

²¹ A significant population is classified as a site that regularly used by more than 1% of the population of qualifying bird species

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			<ul style="list-style-type: none"> • 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 and net biodiversity gain 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. <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 <u>of 20 or more dwellings</u> should include a <u>target minimum</u> of 5% Category 3 (wheelchair accessible <u>or adaptable</u>) housing. <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></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

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			<p>unless viability testing shows otherwise. <u>Evidence should be provided to support the proposed housing mix.</u></p> <p>In particular consideration will be given to:</p> <ol style="list-style-type: none"> 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. 	
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><u>This could include:</u></p> <ul style="list-style-type: none"> • <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> • <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> • <u>Extra Care housing providing independent accommodation with 24 hour care and support available on site.</u> • <u>Residential and Nursing Care Homes</u> 	
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 <u>unless it can be justified that</u></p>	Hearings Action Point 68, 69, 70, 71,72

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		<p><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></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"> • 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 <u>a minimum of 20%</u> of housing for older people, <u>unless evidence justifies a departure.</u> <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"> a) Downsizing – Accommodation 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 b) Retirement Housing will include bungalows and other high quality homes which may be ‘age restricted’ to older people. They can be provided as individual homes or as 	<p>To address comments from Bellway Homes (Rep 26/08)</p>
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			<p>part of a retirement housing scheme and may include communal facilities and on-site management.</p> <p>c) Supported Housing for Older People – Extra Care:</p> <p>i. <u>SUEs and Strategic Sites</u></p> <p>Mixed tenure Extra Care Housing providing independent accommodation with 24 hour care and support available on-site 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"> • St Christopher’s Drive, Oundle (EN27), and Hayway, Northampton Road, Rushden²² will, subject to viability, be supported to deliver specific Extra Care provision • East of Ferrers School, Higham Ferrers²³ 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. <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>d) Residential and Nursing Care Homes</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>	
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²² Rushden Neighbourhood Plan Policy H2F

²³ Higham Ferrers Neighbourhood Plan Policy HF.H4

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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>a) <u>Self-build housing</u></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"> 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 wastewater connections, or make adequate alternative arrangements. <p>b) <u>Custom build housing</u></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 426 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"> 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 426 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. 	Hearings Action Point 76 and Post Hearings Letter
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			<p><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></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>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.</p> <p><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></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;">Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033</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>TOTAL</td> <td style="text-align: center;">28</td> </tr> </tbody> </table>	Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033		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	TOTAL	28	Factual correction and update in response to the Inspector's Initial Question IQ5.
Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033														
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													
TOTAL	28													

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Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeople accommodation 2018-2033

Status	Identified need 2018-31	Identified need 2031-2033
Gypsies and Travellers		
Meet Planning Definition	0	0
Undetermined	14	3
Do not meet Planning Definition	11	0
Travelling Showpeople		
Meet Planning Definition	6	0
Undetermined	0	0
Do not meet Planning Definition	0	0

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.

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			<p><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></p> <p><i>Amend paragraph 8.98 as follows:</i></p> <p>Overall, the residual requirements for additional <u>gypsy and traveller</u> pitches are minimal and <u>relate to undetermined need which can be met using criteria based policies, therefore</u>the scale of need is such that there is no need to allocate further sites in the Plan to fulfil the outstanding 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. <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></p>		
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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 and, 2019²⁴ <u>and 2020</u>) have seen the anticipated delivery at these progressively diminishing; such that as at 1 April 2019 2020 it is currently forecast that just <u>1,250</u> dwellings would come forward at the two sites by 2031 (<u>17.15</u>% of the total requirement). Table 22 below provides a</p>	To update with 2020 monitoring information.
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²⁴ <http://www.nnjpu.org.uk/publications/amr-2018-19-assessment-of-housing-land-supply-2019-24/>

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comparison between the 2016 (Joint Core Strategy adoption) and ~~2019~~**2020** (latest Authorities' Monitoring Report) positions.

Amend table 22 as follows:

Table 22		Anticipated delivery by 2031	
Sustainable Urban Extension	Relevant Policy reference	Joint Core Strategy (JCS), Annex A (base date, 1 April 2016)	2019 2020 Authorities Monitoring Report (base date, 1 April 20192020)
Rushden East	JCS Policy 33	1,600	1,200 1,050
Irthlingborough West	JCS Annex A	700	250 200
TOTAL		2,300	1,450 1,250

Amend paragraph 9.4 as follows:

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, ~~1,200~~**1,050** (out of up to 2,700 dwellings) are currently anticipated to come forward by 2031.

Amend paragraph 9.5 as follows:

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 (**also known as High Hayden Garden Community**) 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). **This emphasises that the Rushden East/ High Hayden Sustainable Urban Extension should be delivered in accordance with the Government's Garden Communities principles.**

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			<p><i>Add new paragraph after paragraph 9.7:</i></p> <p><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></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, <u>above</u> identifies the development boundaries for the delivery of the Rushden East Sustainable Urban Extension (SUE). This <u>development, also known as High Hayden Garden Community</u>, 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 <u>two</u> 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>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).</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) forms part of the Local Plan and it is set out as an appendix to that document. 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 <u>site to inform future planning applications and will ensure a comprehensive approach to site delivery</u>. forms part of the Local Plan and is set out as an appendix to that document. The MFD provides a spatial development context for the delivery of the site. This is designed to inform future planning applications <u>Planning applications will be required to be broadly consistent with the MFD and the principles of the Government’s Garden Communities initiative.</u></p>	

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		<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><u>Economic:</u></p> <ol style="list-style-type: none"> 1. <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> 2. <u>Providing opportunities for small-businesses and those driving enterprise and innovation.</u> 3. <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> 4. <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> 5. <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> <ul style="list-style-type: none"> • <u>Traffic signals provided to control vehicular traffic and allow for safe pedestrian and cycle movement;</u> 	
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			<ul style="list-style-type: none"> • <u>Crossings at-grade to ensure maximum accessibility for pedestrians and cyclists;</u> • <u>Change in surface material to ensure that user priority is clear and that the crossing is legible for pedestrians, cyclists and drivers;</u> • <u>Minimum pedestrian crossing width of 8m to allow comfortable and safe movement for pedestrians.</u> <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>	
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			<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"> • <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> • <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> • <u>The retention of existing hedgerows and provision of formal street tree planting, particularly on higher order streets.</u> • <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> • <u>Sensitive landscape treatment of the aircraft crash site.</u> • <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> • <u>An urban form that responds to the wider context and character of Rushden.</u> • <u>A range of development with higher densities focussed around the two local centres.</u> 	
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			<ul style="list-style-type: none"> • <u>Suitable Alternative Natural Greenspace (SANG) of approximately 21 hectares, supported by a Habitats Regulations Assessment</u> • <u>A Sustainable Urban Drainage System.</u> • <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> • <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> • <u>The preparation and agreement of Design Codes to guide planning applications for the SUE.</u> • <u>A design brief, which will be prepared for the grey land to ensure a cohesive approach to development.</u> <p><u>Social:</u></p> <ol style="list-style-type: none"> 13. <u>Provision of a new Town Park (of approximately 3.6ha).</u> 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> 15. <u>Provision of a Cemetery (approximately 2ha) with access, parking and relevant supporting infrastructure in line with MFD Figure 2.2.</u> 16. <u>Provision of allotments in the northern and southern neighbourhoods (approximately 2.20ha) in line with MFD Figure 2.2.</u> 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> 	
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			<p>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></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>	
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Town Centre Strategies

MM67	Para 10.10	174	<p><i>Amend paragraph 10.10, 2nd sentence as follows:</i></p> <p>Policy EN34 sets out a framework for assessing development opportunities within and around the wider 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>	

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			<p>Development proposals for the town centres: Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston 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"> 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 nighttime - 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. <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;">Spatial parts of Rushden and Higham Ferrers</td> <td style="width: 33%; text-align: center;">Characteristics</td> <td style="width: 33%; text-align: center;">Relevant spatial strategy policies</td> </tr> </table>	Spatial parts of Rushden and Higham Ferrers	Characteristics	Relevant spatial strategy policies	
Spatial parts of Rushden and Higham Ferrers	Characteristics	Relevant spatial strategy policies					

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			Core urban area	<ul style="list-style-type: none"> • Defined by radial routes – Higham Road/ High Street/ Bedford Road (north-south) and John Clark Way/ Newton Road/ Wellingborough Road (east-west) • Based around Victorian terraced roads, with former Boot and Shoe factory sites, with post-war suburban development to the south • Distribution centre to east of town centre, off John Clark Way (Spire Road) constructed late 2000s • Includes key services and facilities – town centre, leisure centres (Pemberton Centre/ Splash Pool), schools • Character defined main public open spaces – Rushden Hall Park, Spencer Park 	Policy EN1(1) (a); JCS Policy 11(1)(a)			
			Rushden West (employment area)	<ul style="list-style-type: none"> • Main employment area of Rushden • Longstanding industrial area, has grown in a piecemeal way over a long period • Includes environmentally challenging businesses e.g. Monoworld, Sander’s Lodge (waste treatment) • Incorporates Rushden Lakes and Rushden Gateway – main new employment sites • Includes enhanced visitor access to Nene Valley, via Rushden Lakes 	Policy EN1(1) (a); JCS Policy 11(1)(a)			

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			<p>Rushden East (Sustainable Urban Extension)</p> <ul style="list-style-type: none"> Proposed strategic urban extension to east of A6 Bypass Requires new east-west connections across A6 Development will include new community infrastructure; e.g. schools, neighbourhood centre Development will be supported by strategic green infrastructure 	<p>Policy EN1(1) (a); JCS Policy 33</p>		
			<p>Avenue Road/ Bedford Road/ Newton Road</p> <ul style="list-style-type: none"> Ribbon development, connecting Newton Road, Avenue Road and Bedford Road Suburban character Includes a mix of rural businesses (e.g. stables) and more urban uses (e.g. care homes) 	<p>JCS Policy 11(2) (a) Neighbourhood Plan Policy H4</p>		
			<p>Higham Ferrers</p> <ul style="list-style-type: none"> Self-contained urban area, enclosed by Rushden (south), A6 Bypass (east) and A45 Bypass (west) Historic market town – includes many heritage assets e.g. Chichele College, Castle Main employment area to the east of the town (south of Kimbolton Road) Individual character areas are defined in the Higham Ferrers Neighbourhood Plan 	<p>Policy EN1(1) (a); JCS Policy 11(1)(b)</p>		
MM70	Policy EN35	180	Amend Policy EN35 as follows:			Hearings Action Point 113, 114, 115

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			<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> on the Policies Map should deliver increased footfall and enhanced vitality and viability for the town centre.</p> <p><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></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"> a) The creation of a pedestrian link between the High Street and the shops 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 the connection to the High Street primary shopping area; e) <u>The preservation and enhancement of the heritage assets on the site, in accordance with a heritage impact assessment;</u> f) <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure;</u> 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 <u>by providing an equivalent replacement facility</u> 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. 	<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><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></p>	<p>To address recommendations of the HRA.</p>

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			<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>	
MM72	Para 10.30	183	<p><i>Add new text after paragraph 10.30, as follows:</i></p> <p><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></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"> 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; 	To address comments from Historic England (SOCG) (f) (Rep 39/09) and Anglian Water (g) (Rep 22/17)

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			<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) Appropriate development contributions for education and training, to offset the loss of longstanding business premises;</p> <p>f) <u>The preservation and enhancement of the heritage assets on the site, in accordance with a heritage impact assessment and</u></p> <p>g) <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure</u></p>			
MM74	Table 25 After Para 10.42	189	Amend Table 25 as follows:			Hearings Action Point
			Spatial parts of Irthlingborough	Characteristics	Relevant spatial strategy policies	
			Core urban area (existing)	<ul style="list-style-type: none"> South of the A6, defined by main arterial routes – Finedon Road, Station Road, Wellingborough Road Includes key services and facilities – town centre, schools Hosts main employer – Whitworth 	Policy EN1 (1) (b): JCS Policy 11(1) (b)	
			Irthlingborough West (Sustainable Urban Extension)	<ul style="list-style-type: none"> Permitted major extension to main urban area Will enable new Finedon Road (A6) and Wellingborough Road connections 	Policy EN1 (1) (b) JCS Policy 11(1) (b)/Annex A	
Irthlingborough East	<ul style="list-style-type: none"> Former principal employment and leisure hub Separated from main urban area by A6 Bypass 	Policy EN1 (1) (b): JCS Policy 11(1) (b)				

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			<ul style="list-style-type: none"> Two main elements – Nene Park (former Rushden & Diamonds FC stadium, south of Diamond Way/ Marsh Lane) and Nene Business Park (mixed use redevelopment site, north of Diamond Way/ Marsh Lane) Mixed use developments at Nene Business Park site (Attley Way) currently under construction – new food/ convenience retailing, housing 		
			<p>Crow Hill (lower)</p> <ul style="list-style-type: none"> Ribbon development along Addington Road Separated from main urban area by A6 Bypass Characteristically suburban, but with rural elements e.g. Bypass Farm/ butchers 	<p>Policy EN4: JCS Policy 11(2) (a)</p>	
			<p>Crow Hill (upper)</p> <ul style="list-style-type: none"> Secondary/ smaller part of Irthlingborough, with urban character Separated from main urban area by A6 Bypass and some agricultural fields Addington Road provides main arterial route Includes some local services, facilities and businesses – convenience store, community centre, Frontier Centre 	<p>Policy EN1 (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 & 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"> A balance and mix of main town centre uses, including convenience and comparison retailing, financial services and/ or food and drink businesses; Enhancements to the High Street primary shopping frontage; 		<p>To address comments from Historic England (SOCG) (Rep 39/10)</p>

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			<ul style="list-style-type: none"> 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) Enhancements Preservation and enhancement to the settings of the heritage assets, with particular reference to St Peter’s Church and the Louisa Lilley Almshouses” 	
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. <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> The loss of the stadium, <u>playing pitches and ancillary facilities</u> requires suitable mitigation (i.e. alternative provision, unless it can be demonstrated that the <u>facilities are</u> stadium site is surplus to requirements), in accordance with NPPF paragraph 97<u>9. Account should also be taken of the findings of any subsequent Playing Pitch Strategy.</u></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><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></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>

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			<p><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></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"> 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. <u>A site-specific Habitat Regulations Assessment should be provided;</u> d) Suitable access and highways arrangements to enable the site to be served by public transport; e) Improved arrangements for pedestrians and cyclists crossing the A6 to Station Road and accessing the town centre (east) f) Pedestrian and cycle connections to East Northamptonshire Greenway, via the Old Bridge and Marsh Lane (west) 	

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			<p>g) Design, height and massing together with protecting the setting of nearby heritage assets, such as Irthlingborough Bridge and Crow Hill Iron Age Fort and non-designated heritage assets, and</p> <p>h) Provision for new moorings along the River Nene Navigation allowing direct riparian access, and</p> <p>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</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, Barnwell, Cotterstock, Glaphorn and Stoke Doyle. Figure 28 and Table 26 (below) outline the main characteristics of each, with the relevant spatial strategy policy references. <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></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"> Defined by West Street and North Street; <u>the Market Place which links them and New Street</u> (A427) Includes key services and facilities – town centre Historic character defined by Oundle School </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"> Defined by West Street and North Street; <u>the Market Place which links them and New Street</u> (A427) Includes key services and facilities – town centre Historic character defined by Oundle School 	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"> Defined by West Street and North Street; <u>the Market Place which links them and New Street</u> (A427) Includes key services and facilities – town centre Historic character defined by Oundle School 	Policy EN4 (1)(c); JCS Policy 11(1)(b)											

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				<ul style="list-style-type: none"> • <u>Hosts main employment areas – Main employment areas situated to the east of the historic core of the town</u> - Nene Business Park/ Fairline Boats; East Road 		
			Oundle north	<ul style="list-style-type: none"> • Suburban urban extension, north of New Road, focused upon arterial Glaphorn Road/ Cotterstock Road • Developed since 1950s • Focal points – Oundle Primary School, Occupation Road playing fields • Potential for expansion of urban area to the north (Oundle/ Glaphorn Parish), but recognise concerns regarding potential coalescence with Glaphorn 	Policy EN1 (1)(c); JCS Policy 11(1)(b)	
			Oundle Marina/ Barnwell Country Park	<ul style="list-style-type: none"> • Significant tourism and leisure hub • Separated from main urban area by River Nene • Majority of area is functional floodplain • Committed redevelopment proposal – Oundle Marina • Further opportunities e.g. Barnwell Mill 	Policy EN1 (3)(a); JCS Policy 11(2)(a)	
			Elmington/ Laxton Drive (Ashton Parish)	<ul style="list-style-type: none"> • Ribbon development along A605 • Separated from main urban area by A605 Bypass • Suburban element (Laxton Drive) • Riverside Hotel presents redevelopment challenge 	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

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	and 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. <u>The former recycling centre and car park adjacent to the Joan Strong Centre has undergone some changes in recent years.</u> 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 <u>The</u> recycling centre and former Council car park could provide development opportunities, neither site <u>are brownfield urban sites, but neither</u> is currently available. Both are brownfield sites, situated within the urban area. Future development proposals <u>If either site becomes available in the longer term, any potential redevelopment scheme</u> would <u>could</u> be informed by <u>a development brief, alongside</u> 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. <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></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"> • 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. <p>Redevelopment schemes should deliver the following outcomes:</p> <p>a) Retention <u>Preservation</u> and enhancement of the heritage asset;</p>	Hearings Action Point 120

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			<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 After Para 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"> Defined by London Road (west), Brick Kiln Road (north) and High Street/ Brook Street Includes key services and facilities – linear town centre, focused on The Square/ Brook Street Historic character defined by St Peter’s Church Hosts significant suburban areas to the east and west of High Street/ Brook Street </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"> Sustainable urban extension to the north of Brick Kiln Road (also known as Border Park) Developed since 2013 Focal points – Raunds Town FC, new London Road/ Michael Way local centre/ service hub adjacent to A45 Potential for further expansion of urban area to the east of Border Park </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"> Defined by London Road (west), Brick Kiln Road (north) and High Street/ Brook Street Includes key services and facilities – linear town centre, focused on The Square/ Brook Street Historic character defined by St Peter’s Church Hosts significant suburban areas to the east and west of High Street/ Brook Street 	Policy EN1(1)(b); JCS Policy 11(1)(b)	Raunds north	<ul style="list-style-type: none"> Sustainable urban extension to the north of Brick Kiln Road (also known as Border Park) Developed since 2013 Focal points – Raunds Town FC, new London Road/ Michael Way local centre/ service hub adjacent to A45 Potential for further expansion of urban area to the east of Border Park 	Policy EN1(1)(b); JCS Policy 11(1)(b)	Hearings Action Point
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			Raunds north east	<ul style="list-style-type: none"> Sustainable urban extension to north east of existing urban area, known as Northdale End Significant new green infrastructure corridor adjacent to Brooks Road, utilising Hog Dyke 	Policy EN1(1)(b); JCS Policy 11(1)(b)	
			Raunds south	<ul style="list-style-type: none"> Sustainable urban extension to the south of the town Two significant developments to south of Grove Street – Weighbridge Way (developed during 2000s) and Willow Way (2010/11) Major development at Darcy Park (also known as Darsdale Farm) recently started, including significant new public open space 	Policy EN1(1)(b); JCS Policy 11(1)(b)	
			Warth Park (west of Raunds)	<ul style="list-style-type: none"> Main employment area of Raunds Major strategic warehousing and distribution site Also includes significant new green infrastructure between warehouses and A45 	Policy EN1(1)(b); JCS Policy 11(1)(b)	
			Brooks Road	<ul style="list-style-type: none"> Ribbon development along Brooks Road, beyond Northdale End Suburban character Transition between urban (Northdale End) and rural (Brook Farm Livery Stables) 	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
			Spatial parts of Thrapston and Islip	Characteristics	Relevant spatial strategy policies	
			Core urban area	<ul style="list-style-type: none"> Defined by radial arterial roads – High Street/ Huntingdon Road, Midland Road and Oundle Road Historic core based around High Street/ 	Policy EN1(1)(b); JCS Policy 11(1)(b)	

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			<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"> Includes key services and facilities – town centre retailing, school, main public open spaces, leisure centre 			
			<p>Haldens Parkway (employment area)</p>	<ul style="list-style-type: none"> Main employment area of Thrapston, east of A605 Major strategic warehousing and distribution site, with access to A14 and A45 Trunk Roads Scope for further expansion of logistics or warehousing businesses, if necessary 	<p>Policy EN1(1)(b); JCS Policy 11(1)(b)</p>	
			<p>Islip village</p>	<ul style="list-style-type: none"> Self-contained village, with a range of services but a close functional relationship with Thrapston Linear village, defined by Lowick Road, High Street and Chapel Hill/ Toll Bar Road 	<p>Policy EN1(2)(b); JCS Policy 11(2)(a)</p>	
			<p>Islip south</p>	<ul style="list-style-type: none"> Linear area, west of River Nene, situated between Kettering Road and A14 Major strategic employment site, including Islip Furnace and Primark premises Linear/ ribbon development part of Islip village to the south of Kettering Road, separated from Islip village by cricket field/ Woolpack pub 	<p>Policy EN1(2)(b) & EN1(3)(a); 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>

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			<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>	
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"> 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) Enhancements <u>Preservation and enhancement</u> to the settings of adjacent heritage assets, <u>non-designated heritage assets</u> and the Conservation Area; and g) Additional town centre public car parking. 	To address comments from Historic England (SOCG) (Rep 39/12)

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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) <u>and subsequent Regulation 19 draft</u></p>	Northamptonshire County Council
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Schedule of proposed Main Modifications – March 2023

		<p>submission Plan consultation (2019) identified various localised infrastructure priorities, over and above the strategic projects as identified above:</p> <p><i>Bullet point 3:</i></p> <ul style="list-style-type: none"> Education - delivery of new academies/ free schools, working with the Department for Education, <u>in accordance with current local education authority²⁵ and national²⁶ policies.</u> <p><i>New bullet point:</i></p> <ul style="list-style-type: none"> <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> 	(Development Infrastructure) (Rep 49/04, 49/10)
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²⁵ 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

Planning for Schools Development (2011):

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

²⁶ Planning for Schools Development (2011):

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

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MM87	Table 29	214 to 219	<i>Amend table 29 as follows:</i>				Hearings Action Point 178
Table 29: Performance indicators and targets for monitoring							
Policy	Objective	Indicator	Targets Aims	Targets			
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 Restrict all but small scale or infill development in rural areas, unless promoted through Neighbourhood Plans and/ or rural exceptions housing schemes	<u>Levels of development to accord with the spatial roles set out in table 2 of the Plan</u> <u>Levels of residential development to align with table 3 of the Plan</u>			
EN2	Provide a clear differentiation between the urban/ built up areas and their surrounding rural hinterlands <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 <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>			

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			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	<u>No inappropriate development on the periphery of settlements, other than for rural exceptions.</u>	
			EN6	Provide clear guidelines for appropriate	Number of dwellings permitted and/ or	Restrict the development of inappropriate new	<u>No inappropriate new build</u>	

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				replacement dwellings in open countryside	built in the open countryside	build replacement dwellings in open countryside	<u>replacement dwellings in the open countryside other than those which accord with Policy EN6.</u>		
			EN7	Protect and enhance existing and future Green Infrastructure corridors	Net loss/ gain in GI across the district New open space provided within or connected to the existing GI network Projects to enhance GI in the district	Net To increase in connected open space and GI throughout the district	<u>Overall net gain in GI.</u>		
			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 Completion of Greenway projects/ developments	Complete the Greenway within the district	<u>Increase in the number of GI projects completed.</u> <u>Completion of the Greenway and associated projects.</u>		
			EN9	Define an enhanced local interpretation of the NPPF criteria for the designation of	Designation of Local Green Space within Neighbourhood Plans	No loss of Local Green Space <u>To facilitate the protection of Local Green Space</u>	<u>No loss of Local Green Space.</u> <u>Net increase in Local Green Space.</u>		

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 <u>To ensure new development makes adequate provision for open space.</u>	<u>Net increase in open space across the district.</u> <u>No net loss of open space.</u>	
			EN11	Enhance existing sport and recreation facilities, or provide new sport and recreation facilities	Number of permitted strategic developments <u>Amount of new sports and recreation facilities provided/ contributions secured toward facilities.</u>	Net increase in sport and recreation facilities across the district <u>To ensure new development makes adequate provision for sports and recreation facilities.</u>	<u>Net increase in sport and recreation facilities provided/ increase in improvements towards existing facilities.</u> <u>No net loss of sport and recreation facilities.</u>	
			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	<u>To enable and promote healthy lifestyles.</u> Submission of Health Impact Assessments to accompany all major planning applications.	<u>All major applications to be accompanied by a HIA.</u>	

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. <u>No upheld at appeal</u>	Restrict inappropriate development of new buildings and extensions so that they are in keeping with the surrounding environment	<u>100% of cases refused on design grounds to be upheld at appeal.</u>	
			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 <u>Maintaining Heritage Assets</u> <u>Maintaining non designated Heritage Assets</u> <u>Change in areas designated for</u>	Restrict inappropriate development which affects a designated heritage asset or its setting	<u>Maintain existing areas designated Conservation Areas (no net loss):</u> <u>Maintain existing number of listed buildings (no loss)</u> <u>Maintain the number of</u>	

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> <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 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/ B&B accommodation	overnight accommodation			
			EN17	Implementation of SEN school proposal at Land west of Moulton College, Chelveston Road within the Plan period	Development of SEN school proposal permitted	To deliver new SEN school development to meet the needs and requirements of the Friars East Academy		
			EN18	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	<u>A net increase in the number of completions for small and medium scale commercial development.</u>	
			EN19	Ensure that existing employment sites are protected for employment use	Use status of the sites	<u>No To prevent the</u> loss of employment uses within the Protected Employment Areas unless the site is demonstrably no longer suitable for employment	<u>No net loss of employment uses within the Protected Employment Areas unless the site is demonstrably no longer suitable for employment</u>	

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	<u>All expanded/relocated business to be adjacent to built up area.</u>	
			EN21	Increase the vitality of the town centres and primary shopping areas <u>frontages</u>	Public realm improvements within the town centres and primary shopping areas <u>frontages</u> <u>Percentage of development within defined town centre boundaries</u> <u>Change of use of upper floors</u> <u>Change of use to residential (non-primary frontage)</u> <u>Percentage of non-retail within primary frontages</u>	Encourage appropriate development within the town centres and primary shopping areas <u>frontages</u>	<u>Increase the percentage of town centre development within defined boundaries.</u> <u>Decrease the number of vacancies at upper floor level.</u> <u>Increase the percentage of retail uses within primary frontage/ decrease non-retail uses in frontages.</u>	
			EN22	Provide floorspace	Number of permitted retail	Restrict inappropriate retail	<u>No specific target, however,</u>	

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><u>Proposals for out / edge-of centre supported by a sequential test and an impact assessment where above the relevant threshold</u></p>	<p>development outside the primary shopping areas of the six towns</p>	<p><u>monitoring indicator to identify the number and type of these developments.</u></p> <p><u>100% of proposals for out / edge-of centre supported by a sequential test and impact assessment above the relevant threshold</u></p>		
			EN23	<p>Provide clear direction for specified main town-centre use developments at outside of the local centres</p>	<p>Number of permitted specified main town-centre uses adjacent to within 200m of the local centres</p>	<p>Encourage specified main town-centre uses at outside of the local centres that offer day to day local services, improved connectivity and do not affect local amenity</p>	<p><u>100% adjoining/closely related to built up area;</u></p> <p><u>Amount of new floorspace for each type of use</u></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	<u>Delivery of the site by 2031</u>
			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	<u>Delivery of the site by 2031</u>
			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	<u>Delivery of the site by 2031</u>
			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	<u>Delivery of the site by 2031</u>
			EN29	Delivery of an appropriate quantum of Category 3 (wheelchair accessible <u>or adaptable</u>)	Number of Category 3 (wheelchair accessible <u>or adaptable</u>) units delivered	Delivery of 5% of units as Category 3 housing on sites of 50 dwellings or more <u>To increase the delivery of Category 3 housing</u>	<u>Delivery of 5% of units as Category 3 housing on sites of 20 dwellings or more</u>

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 <u>Proportion of 1, 2, 3, 4, 5+ bed properties.</u> <u>Tenure split of properties</u>	Encourages a range and mix of house types and tenures to meet the needs of the wider community <u>in accordance with the evidence base</u>	<u>100% in accordance with tenure/ size proportions set out in the evidence base, unless justified by evidence</u>	
			EN31	Delivery of specialist housing: <ul style="list-style-type: none"> • Older persons accommodation to meet local need • Extra Care development schemes as part of major strategic sites in accordance with local needs 	Numbers of older persons (and specifically Extra Care) units of accommodation achieved on sites over and above the defined policy thresholds 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 Delivery of Extra Care housing in association with development in accordance with policy criteria at named sites: <ul style="list-style-type: none"> • Rushden East SUE • Irthlingborough West SUE • St Christopher's Drive, Oundle 	<u>Delivery of 10% of units (20% in rural area) as housing for older people, in accordance with defined policy thresholds</u> <u>Delivery of Extra Care housing in association with development in accordance with policy criteria at named sites:</u> <ul style="list-style-type: none"> • <u>Rushden East SUE</u> • <u>Irthlingborough West SUE</u> • <u>St Christopher'</u> 	

Schedule of proposed Main Modifications – March 2023

					<ul style="list-style-type: none"> • East of Ferrers School, Higham Ferrers <p><u>To increase delivery of specialist housing for older persons.</u></p>	<p><u>s Drive, Oundle</u></p> <ul style="list-style-type: none"> • <u>Hayway, Northampton ton Road, Rushden</u> • <u>East of Ferrers School, Higham Ferrers</u> 			
			EN32	Delivery of self and custom build	Number of self and custom built dwellings achieved on sites of 50 dwellings or more	<p>At least 5% of plots on sites of 50 dwellings or more safeguarded for self or custom built dwellings <u>To increase delivery of self and custom build housing.</u></p>	<p><u>At least 5% of plots on sites of 50 dwellings or more provided for self or custom built dwellings</u></p> <p><u>Meeting demand on self/custom build register</u></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>Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory for East Northamptonshire</p>	<p><u>Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory</u></p>		

Schedule of proposed Main Modifications – March 2023

			Masterplan Framework Document (MFD)		<u>To ensure the principles for delivering the SUE are met.</u>		
			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 <u>Enhance vitality/viability of town centres</u>	No of development proposals approved in accordance with all of the relevant policy criteria	<u>Increased footfall in town centres</u> <u>Increase in the proportion of retail use in town centres</u> <u>Increase in proportion of town centre uses</u> <u>Increase in the no of active frontages.</u> <u>Reduction in the no of vacancies in town centres</u>
			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	<u>By 2031, redevelopment of the site as set out in Policy EN35.</u>

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	<u>By 2031, redevelopment of the site as set out in Policy EN36.</u>		
			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	<u>By 2031, redevelopment of the site as set out in Policy EN37.</u>		
			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	<u>By 2031, redevelopment of the site as set out in Policy EN38.</u>		

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	<u>By 2031, redevelopment of the site as set out in Policy EN39.</u>	
			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	<u>By 2031, redevelopment of the site as set out in Policy EN40.</u>	

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	<u>By 2031, redevelopment of the site as set out in Policy EN41.</u>		
			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	<u>By 2031, redevelopment of the site as set out in Policy EN42.</u>		

Schedule of proposed Main Modifications – March 2023

						the setting of heritage assets, and public car parking		
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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 <u>EN1-EN2 and the supporting text.</u></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 (or Primary Shopping Frontage) – defined areas where retail development is concentrated.</p> <p><u>Primary Shopping Frontage – Shopping frontage which contains a high proportion of retail uses.</u></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>Non-<u>sStrategic</u> – 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)
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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>	
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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: Apartment, or bungalow <u>or smaller home</u>	Hearings Action Point 74
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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

Source of Housing Supply	2011/12 to 2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
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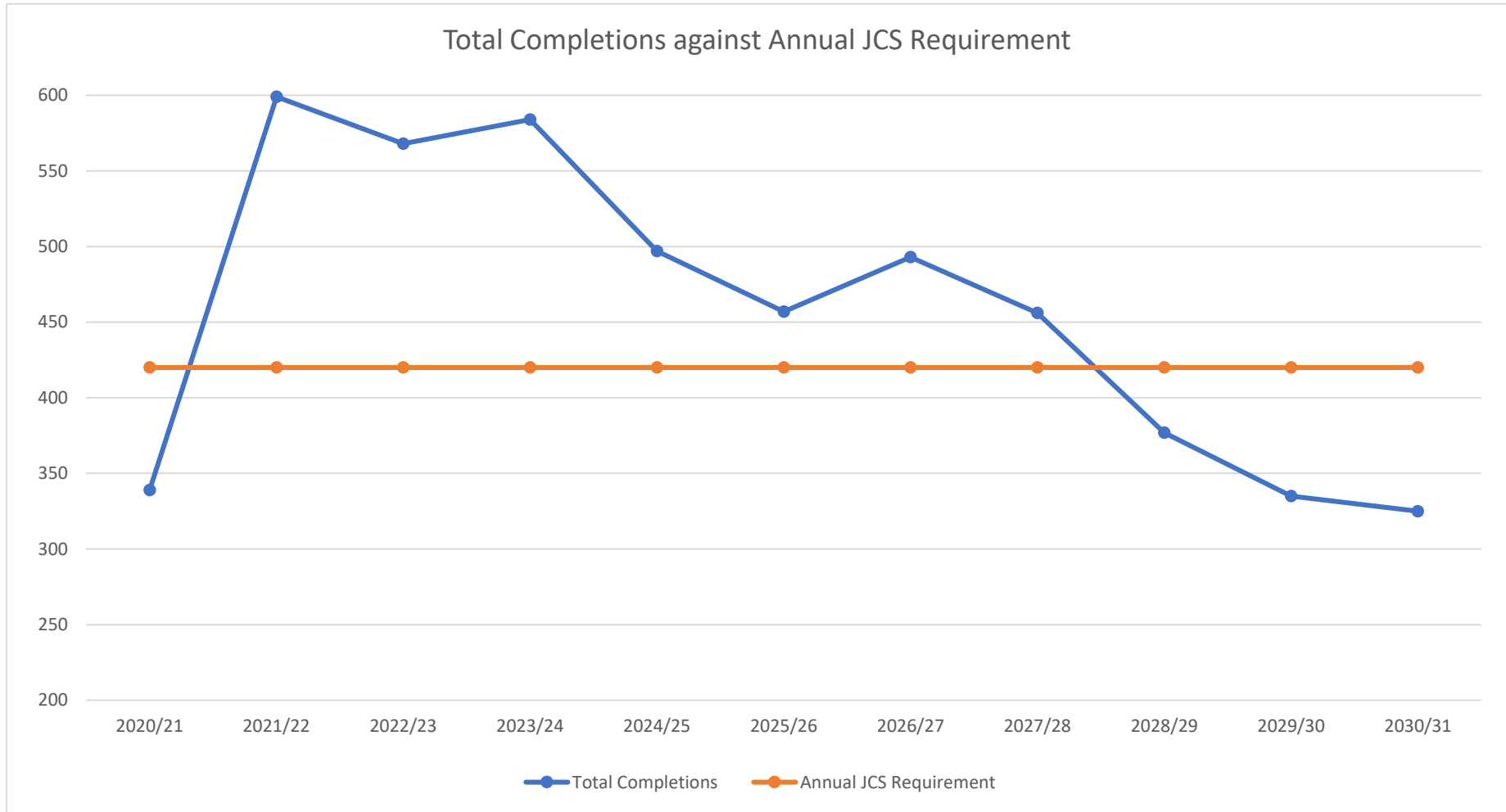
Schedule of proposed Main Modifications – March 2023

Past Completions	3883											
3b - Under construction/ started		263	179	114	108	8	0	0	0	0	0	0
3c(i) - Full planning permissions/ minor outline permissions		66	207	98	2	0	0	0	0	0	0	0
3c(ii) - Outline planning permissions (major >9)		0	0	14	10	0	0	0	0	0	0	0
3e - Major urban extensions		0	0	0	0	100	150	200	250	250	250	250
3f - Other site allocations (current local plan)		0	0	0	25	29	51	25	14	6	0	0
3g - Neighbourhood Plan site allocations (Made)		0	2	119	183	172	109	128	132	41	5	10
3h(i) - Emergent DPD allocations		0	80	85	173	128	117	100	60	80	80	65
3h(ii) - Rural and Market Town windfall sites		0	40	30	55	60	0	0	0	0	0	0

Schedule of proposed Main Modifications – March 2023

3j - Specific, unallocated brownfield sites		10	91	108	28	0	30	40	0	0	0	0
Total Completions	3883	339	599	568	584	497	457	493	456	377	335	325
Cumulative Total		4222	4821	5389	5973	6470	6927	7420	7876	8253	8588	8913
JCS Cumulative Requirement		4200	4620	5040	5460	5880	6300	6720	7140	7560	7980	8400
Annual JCS Requirement		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/ Policy/ Figure/T able/Map ref	Public ation Plan Page	Proposed Change	Reason for Change
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Contents

AM1	Contents 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
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Schedule of proposed Additional Modifications – March 2023

			Regulation 19 Policy Number	Modified Policies	
			<i>EN1 Spatial Development Strategy</i>	<i>EN1 Spatial Development Strategy</i>	
			<i>EN2 Settlement boundary criteria- urban areas</i>	<i>EN2 Settlement boundary criteria- urban areas</i> Development Principles	
			<i>EN3 Settlement boundary criteria- free standing villages</i>	<i>EN3 Settlement boundary criteria- free standing villages</i>	
			<i>EN4 Settlement boundary criteria- ribbon developments</i>	<i>EN4 Settlement boundary criteria- ribbon developments</i>	
			<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 Local 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>	<i>EN17 Land south of Chelveston Road, Higham Ferrers</i>	
			<i>EN18 Commercial space to support economic growth</i>	<i>EN18 Development of commercial space to support economic growth for Small and Medium-sized enterprises</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 Local 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 & 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 & 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><u>Appendices:</u> <u>Appendix 1 Policy Index</u> <u>Appendix 2 Economic Use Classes</u> <u>Appendix 3 Employment Protection Areas</u> <u>Appendix 4 Town Centres; Primary Shopping Areas and Local Centres</u> <u>Appendix 5 Specialist and Older Person Housing Provision-Site selection and design principles criteria</u> Appendix 6 Rusden East SUE Masterplan Framework Document <u>Appendix 6 Housing Trajectory</u></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
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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> 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> <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>	Update in relation to MM65
AM7	Para 2.54	37	<i>Amend para 2.54 as follows:</i> In the final sentence delete the word” future” and replace with <u>emerging</u>	For greater clarity

Vision and Outcomes

AM8	Para 3.1	38	<i>Amend text as follows:</i> As the North Northamptonshire Council was will be formed on 1 st 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> The Plan will aim to identify those aspects of the <u>Joint</u> 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 Joint 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. This is described as a “golden thread” running through plan-making and decision making. It should therefore...</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). Policy 1 states that:</p> <p>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.</p>	Hearing outcome (Action Point 6)
AM13	Para 3.10	45	<p><i>Amend text as follows:</i></p> <p>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.</p>	Hearing outcome (Action Point 7)

Schedule of proposed Additional Modifications – March 2023

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Spatial Development Strategy

AM14	Para 4.9	48	Amend third sentence as follows: Four years s Since the adoption...	Factual update
AM15	Para 4.25	50	Amend first sentence of Para 4.25 as follows: 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: (paragraphs 798-7980	Factual update
AM18	Para 4.44	62	Amend NPPF reference in the first sentence as follows: The NPPF (paragraph 8079)	Factual update
AM19	Para 4.45	62	Amend first sentence by deleting reference to the original Policy EN3 which is deleted (see Policy EN3, above)	Correction for clarity
AM20	Para 4.47	62	Amend NPPF reference in the final sentence as follows: (NPPF paragraph 787	Factual update

Natural Capital

AM21	Supporting text to Policy	67	Amend final sentence of paragraph 5.9 as follows:	Improve readability/ consistency
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Schedule of proposed Additional Modifications – March 2023

	EN7 Para 5.9, 5.13 and 5.14		<p>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.</p> <p><i>Amend the first sentence of paragraph 5.13 as follows:</i></p> <p>The NPPF (paragraph 180175) 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 (below) 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 5.17 Supporti ng text to Policy 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, Ringstead and Warmington, plus the emerging Neighbourhood Plan for Ringstead, all include specific proposals for possible extensions and links to the Greenway, shown in Figure 8 (below).</p>	Factual update
AM23	Para 5.18 Supporti ng text to Policy 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 99-101103).</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 1002).</p>	Factual update

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AM24	Para 5.32	80	<p>Add the following sub heading prior to para 5.32:</p> <p><u>Sport and Recreation</u></p>	For Clarity
AM25	Para 6.7	86	<p>Amend paragraph 6.7 by deleting the following words:</p> <p>and emerging Place Shaping Supplementary Planning Document</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, <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> 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>This will be supported by a detailed Place Shaping Supplementary Planning Document (SPD), which is being prepared by the Joint Planning and Delivery Unit.</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 <u>a range of</u> development schemes.</p> <p>especially in the absence of the finalised Place Shaping SPD.</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 3 <u>2</u>). 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 32 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 193—196199-202 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 86–9087-91) 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.</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 80-79(c))</p>	Factual update

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Economic Prosperity

AM33	Para 7.22	112	<p><i>Amend paragraph 7.22 as follows:</i></p> <p>Chelveston Employment and 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);</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 lead led developments</p>	Typographical correction

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AM35	Para 7.48	120	Amend NPPF reference in the first sentence as follows: (NPPF Paragraph 80 81)	Factual update
AM36	Para 7.52	121	Amend NPPF reference in the first sentence and final sentence as follows: (NPPF paragraph 85 86 (b)) Table 13 (below) identifies where current up to date Neighbourhood Plan policies are already in place and/ or where previous Local Plan designations are extant .	Factual update
AM37	Para 7.57	124	Amend NPPF reference in the first sentence as follows: The NPPF required the preparation of an impact assessment for retail, office and leisure uses beyond the town centres (paragraph 89 90).....	Factual update
AM38	Para 7.63	127	Amend NPPF reference in the final sentence as follows: paragraph 92 93 of the NPPF.....	Factual update
AM39	Para 7.64	127	Amend NPPF reference in the first sentence as follows: (NPPF paragraph 86 7)	Factual update
AM40	Para 7.72	128	Amend NPPF reference in the first sentence as follows: (paragraph 88 9)	Factual update

Housing Delivery

AM41	Table 15	133	Rushden East capacity should be 2,700 not 2,500, so total is 3,700 not 3,500 In the Note column relating to Irthlingborough delete comment and replace with the following: <u>Commitment on basis of JCS Annexe A.</u>	Factual update Taylor Wimpey/BDW (Rep 57/15)
AM42	Table 16	134	Table 16 after para 8.8 – 4 th vertical column – 6 th column – heading <u>Commitments</u> 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 <u>indicative</u>	For greater clarity
AM44	Para 8.22	138	<i>Amend para 8.22 first sentence as follows:</i> 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 <u>the Oundle housing policies</u> Policy EN24 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 <u>east</u> before the words Warren Bridge.	Typographical correction
AM46	Para 8.37	145	Amend reference to NPPF paragraph as follows: Paragraph 67 8	Factual Update
AM47	Policy EN28	149	<i>Amend Policy EN28 para 2:</i> Delete “p r cess” and reword as <u>process</u>	Typographical correction

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Delivering Urban Extensions

AM48	Para 9.7	166	<i>Amend para 9.7 first sentence as follows:</i> The extent of the gross development area <u>site allocation</u> to be shown on the Policies Map, is defined by Policy EN33 below <u>and depicted in Figure 18.</u>	For clarity Taylor Wimpey/BDW (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> Obligations Given the passage of time (over six years) 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>10.0 Town <u>Centre</u> Strategies</p>	Hearings Action Point 121
AM51	Para 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, <u>or Oundle.</u></p>	Factual update
AM52	Para 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” (mixed use retail, employment, and care home); and</p>	Factual update
AM53	Para 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, together with the relevant spatial strategy policy references that would apply as follows:</p>	To reflect MM69
AM54	Para 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. <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></p>	Hearings Action Point 116
AM55	Para 10.22	181	<p><i>Amend first bullet point as follows:</i></p>	Typographical correction

Schedule of proposed Additional Modifications – March 2023

			Former factory site, between 71 Oakley Road and 37-51 Westbrook Washbrook Road (0.28ha) – identified in Brownfield Land Register;	
AM56	Para 10.24	181	Para 10.24 – Heading – reads “Westbrook” should be Washbrook	Typographical correction
AM57	Para 10.33	185	<i>Amend second sentence as follows:</i> This recognises the strong functional relationship between the two towns, and the different but closely related spatial development strategies (see Policy EN1(1)(a), above).	To reflect MM6
AM58	Para 10.36	185	<i>Amend final sentence of para 10.36 as follows:</i> 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 2).	Factual correction
AM59	Para 10.38	186	<i>Amend para 10.38 as follows:</i> 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 Employment and 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 <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> Irthlingborough consists of five distinctive spatial parts. Figure 25 and Table 25 (below) outline the main characteristics of each area, with the relevant spatial strategy policy references.	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 EN1 and EN4 EN1 and EN4 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: Way 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 10.6266-10.6468, 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, with the relevant spatial strategy policy references.</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 10.6973).</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, with the relevant spatial strategy policy references.</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, with the relevant spatial strategy policy references.</p>	To reflect MM83

Schedule of proposed Additional Modifications – March 2023

AM68	Appendix 3 Rockingham Enterprise Area Map EN19 (07)		Amend to reflect the proportion of the site that lies within the East Northamptonshire area only.	Factual correction
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Appendix 4

AM69	Appendix 4	1 st and 5 th page of appendix 4	<p><i>Amend front page of Appendix 4 as follows:</i></p> <p>Town Centres <u>boundaries</u> and Primary Shopping Areas <u>Frontages</u>¹: Irthlingborough Oundle Thrapston</p> <p><u>Local Centres:</u> Raunds and Stanwick Rushden Brigstock Ringstead <u>Stanwick</u> Woodford</p> <p><i>Amend Raunds and Stanwick Local Centres Map Legend as follows:</i></p>	Hearings Action Point 108
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¹ 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 (Relates to Raunds Neighbourhood Plan Policy)	
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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
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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 – New Suggested Local Green Infrastructure Corridors</p>	Drafting error
PM2	Policies Map	<p>Policy EN8 Add the words The Greenway to the legend before the word Completed</p> <p>Policy EN8 Add the words The Greenway to the legend before the word Proposed</p> <p>Policy EN8 Add the words The Greenway to the legend before the word Indicative</p> <p>Policy EN8 Add the words The Greenway 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>EN213 – Town Centre Boundaries</p> <p>EN213 – 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 EN16 7 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 The Greenway to the legend before the word Completed</p> <p>Policy EN8 Add the words The Greenway 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 <u>The Greenway</u> to the legend before the word Aspirational Connections	
PM7	Irthlingborough Inset Map	<i>Amend Irthlingborough Legend as follows:</i> EN21 3 – Town Centre Boundaries EN21 3 – Primary Shopping Frontages	Drafting error
PM8	Irthlingborough Inset Map	Policy EN8 Add the words <u>The Greenway</u> to the legend before the word Proposed Policy EN8 Add the words <u>The Greenway</u> 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: EN4- 1 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> EN21 3 – Town Centre Boundaries EN21 3 – Primary Shopping Frontages	Drafting error
PM11	Oundle Inset Map	Policy EN8 Add the words <u>The Greenway</u> to the legend before the word Indicative	For clarity
PM12	Oundle Inset Map	Policy EN7 Add the word <u>GI Corridors</u> to the legend before the words New Cycle Routes	For clarity
PM13	Oundle Inset Map	Policy EN8 Add the words <u>The Greenway</u> to the legend before the word Proposed Policy EN8 Add the words <u>The Greenway</u> to the legend before the word Aspirational Connections	For clarity
PM14	Thrapston Inset Map	<i>Amend Thrapston Legend as follows:</i> EN21 3 – Town Centre Boundaries EN21 3 – Primary Shopping Frontages	Drafting error
PM15	Thrapston Inset Map	Policy EN8 Add the words <u>The Greenway</u> to the legend before the word Indicative Policy EN8 Add the words <u>The Greenway</u> to the legend before the word Proposed Policy EN8 Add the words <u>The Greenway</u> 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>EN213 –Raunds Primary Shopping Area</p> <p>EN23 – Raunds Secondary Shopping Area and delete depiction on the inset map</p>	Drafting error
PM17	Raunds and Stanwick Inset Map	<p>Policy EN8 Add the words <u>The Greenway</u> to the legend before the word Completed</p> <p>Policy EN8 Add the words <u>The Greenway</u> 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>EN4 – Brooks Road</p>	Due to Policy amendments set out in the Main Modifications Schedule

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Council Thursday 7 December 2023

Report Title	Local Council Tax Support Scheme 2024/25
Lead Member	Cllr Lloyd Bunday - Executive Member for Finance and Transformation
Report Author	Janice Gotts – Executive Director of Finance and Performance Lucy Hogston - Assistant Director of Revenues and Benefits

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

List of Appendices

None

1. Purpose of Report

- 1.1. The purpose of this report is to update Full Council on the Local Council Tax Support Scheme for 2023/24 and propose a scheme for 2024/25. This proposal was considered by the Executive at their meeting on the 16th November 2023; the Executive is recommending that full Council approve the proposal.

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 Council to make a determination on a LCTSS for 2024/25.

- 2.2. The proposals for the LCTSS have been reported to the October Corporate Scrutiny Committee for comment and subsequently on to November Executive for recommendation on to Full Council.

3. Recommendations

- 3.1. Full Council is recommended to:
- 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.
- 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 the 1 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 the 1 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 the 24 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 the 1 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 April 2023 – 31 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 April 2023 to 31 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 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. Subject to approval by full Council the LCTSS will be implemented for the financial year 2024/25.

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 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 has considered the scheme and comments from its meeting on the 10 November 2023 to make a recommendation to Council for consideration in relation to the LCTSS. The LCTSS for 2024/25 must be determined by 11 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

7.6.1. The Executive considered the proposals at its meeting held on 16th November 2023, recommending them for approval to Council.

7.7. Consideration by Scrutiny

7.7.1. The Corporate Scrutiny Committee considered the LCTSS 2024/25 at its meeting on the 10 October 2023 and supported 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 January 2021. Include consideration of any equality implications.

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 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 \(moderngov.co.uk\)](https://www.moderngov.co.uk/2021/01/07/meeting-of-north-northamptonshire-shadow-executive-committee-on-thursday-7th-january-2021-north-northamptonshire-council/)

- 8.2. North Northamptonshire Council Finance & Resources Scrutiny Committee, 2 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 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 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 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 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 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. North Northamptonshire Council, Corporate Scrutiny meeting 10 October 2023, Local Council Tax Support Scheme 2024/25

[Local Council Tax Support Scheme.pdf \(moderngov.co.uk\)](#)
- 8.9. North Northamptonshire Council, Executive meeting 16 November 2023, Local Council Tax Support Scheme 2024/25

[17. FINAL Local Council Tax Support Scheme 2024-25.pdf \(moderngov.co.uk\)](#)
- 8.10. Local Government Finance Act 1992.
<https://www.legislation.gov.uk/ukpga/1992/14/contents>
- 8.11. Welfare Reform Act 2012.
<https://www.legislation.gov.uk/ukpga/2012/5/contents>

8.12. Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012.

<https://www.legislation.gov.uk/uksi/2012/2885/contents/made>

Council 7th December 2023

Report Title	Council Tax Base 2024/25
Lead Member	Lloyd Bunday, Executive Member for Finance and Transformation
Report Author	Janice Gotts, Executive Director of Finance and Performance Janice.gotts@northnorthants.gov.uk

Are there public sector equality duty implications?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information (whether in appendices or not)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

List of Appendices

Appendix A - 2024/25 Tax Base by Town/Parish area

1. Purpose of Report

- 1.1. The purpose of this report is to set the Council Tax Base for 2024/25 as required by Section 33 of the Local Government Finance Act 1992, and in accordance with the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012.

2. Executive Summary

- 2.1 A Council Tax Base calculation for the whole of North Northamptonshire Council's (NNC) area for the year 2024/25 has been undertaken with data as at the relevant date, i.e., 1st October 2022 to 30th September 2023.
- 2.2 The calculation has taken account of the number of new properties likely to be completed and banded for Council Tax purposes during the period October 2023 to March 2025 and the anticipated level of occupation. In addition, the predicted discounts and premiums, including those within the NNC Local Council Tax Support Scheme, have been applied as these have an impact on the Tax Base figure.
- 2.3 The resulting calculation equates to a Band D equivalent Tax Base of 117,611 properties before applying the expected collection rate. The Tax Base is

reduced by a percentage which, in the Council's opinion, represents the likely level of collection. This collection rate has been assumed to be 98.5%, based on current collection levels which is unchanged from the previous year (2023/24). On applying this reduction to the calculation, a net Tax Base figure of 115,847 is achieved which is an increase of 1.4% on 2023/24.

3. Recommendations

3.1 It is recommended that Council:

a) In accordance with the Local Authorities (Calculation of Tax Base) Regulation 1992, as amended, approves the amount calculated as the Band D equivalent Council Tax Base for the North Northamptonshire area 2024/25 shall be 115,847 as detailed in this report and appendices. This is an increase of 1,568 over the 2023/24 Tax Base, a 1.4% increase.

b) Notes a Council Tax Collection rate assumption of 98.5% for 2024/25.

3.2 *Reason for Recommendations* – Section 33 of the Local Government Finance Act 1992 and the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012 requires the Council as the Billing Authority to calculate a Council Tax Base for its area by 31 January each year.

3.3 *Alternative Options Considered* – None. The Council is required to set the Council Tax Base for 2024/25, as required by Section 33 of the Local Government Finance Act 1992

4. Report Background

4.1 The Local Government Finance Act 1992 requires the Billing Authority (North Northamptonshire Council) to calculate and approve a Tax Base for Council Tax purposes and to notify major preceptors by 31 January in respect of the following financial year.

4.2 The Government regulations require the Council to review the Council Tax base to be used for setting its 2024/25 Council Tax and the Council Tax Collection Rate for 2023/24.

4.3 The provisional tax base for North Northamptonshire is 115,847 dwellings this is based on a Band D and includes projected growth and an average collection rate of 98.5%.

4.4 The report also details the Council Tax base for the town and parish councils within North Northamptonshire.

5. Issues and Choices

5.1 The main considerations in relation to Council Tax Base for 2024/25 is set out below:

- 5.2 **New Properties.** Provision is made in the 2024/25 Tax Base for new properties that are likely to be occupied before the end of the next financial year. This provision is calculated by taking into consideration assumptions around new housing developments.
- 5.3 **Discounts, reliefs, and exemptions.** Provision is made in the 2024/25 Tax Base for discounts (including Local Council Tax Support Scheme), reliefs and exemptions based on the actuals submitted in the CTB1 form completed in mid-October.¹
- 5.4 **Collection Rate.** A review of the collection rates has been carried out with consideration to the level of debts written off and estimates of the current years collection rate, together with the longer-term impact of the pandemic and the current cost of living crisis, the assumptions used to calculate the 2024/25 Tax Base (98.5%) are adequate.
- 5.5 Taking all the assumptions together there is a net increase in the overall council tax base of 1.4%
- 5.6 **Appendix A** sets out the Band D equivalent properties by towns and parish Councils for 2024/25.

6. Implications (including financial implications)

6.1 Resources and Financial

- 6.1.1 The Council Tax Base is used to calculate the budgeted Council Tax Requirement any movement on the Council Tax Base will be dealt with as part of the Medium-Term Strategic Plan, in terms of impact on growth and collection rates on future years.

6.2 Legal and Governance

- 6.2.1 This report is part of the process required for the Council to meet its legal obligations to set its Tax Base that it notifies to Town and Parish Councils, Police and Fire. This is in accordance with Section 33 of the Local Government Finance Act 1992, and in accordance with the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012.

6.3 Relevant Policies and Plans

- 6.3.1 The tax base is part of the arrangements for the Collection of Council Tax and as such aligns with the Councils priorities set out within the Corporate Plan as part of the delivery of modern public services.

¹ The CTB1 is the annual return to Government which sets out the number of dwellings and those liable for council tax.

6.4 Risk

6.4.1 There are a number of risks associated with estimating the amount of Council Tax Base for the year as this based on the forecasted movement in dwellings, discounts and exemptions as outlined in section 5 of the report.

6.5 Consultation

6.5.1 There is no requirement to consult on the tax base calculation.

6.6 Consideration by the Executive Advisory Panel.

6.6.1 Not considered by the Executive Advisory Panel.

6.7 Consideration by Scrutiny

6.7.1 Not considered by Scrutiny.

6.8 Equality Implications

6.8.1 There are no equality implications from the proposals being made.

6.9 Climate Impact

6.9.1 There are no climate impacts arising from the proposals being made.

6.10 Community Impact

6.10.1 There is no community impact arising from the proposals being made.

6.11 Crime and Disorder Impact

6.11.1 There are no crime and disorder impacts arising from the proposals being made.

7. Background Papers

7.1 The following background papers were considered in relation to this report.

CTB1 form October 2023

Tax Base by Town/Parish

Town/Parish	Council Tax Base 2024/25
Aldwincle	163
Apethorpe	91
Ashley	135
Ashton	111
Barnwell	175
Barton Seagrave	2,626
Benefield	191
Blatherwycke	24
Bozeat	760
Brampton Ash	38
Braybrooke	192
Brigstock	554
Broughton	834
Bulwick	84
Burton Latimer	3,205
Chelveston	218
Clopton	67
Collyweston	229
Corby	16,151
Cotterstock	87
Cottingham	367
Cranford	173
Cransley	135
Deene	65
Deenethorpe	74
Denford	136
Desborough	3,904
Dingley	112
Duddington	80
Earls Barton	2,258
East Carlton	118
Easton Maudit	40
Easton-On-The-Hill	458
Ecton	227
Finedon	1,517
Fineshade	21
Fotheringhay	71
Geddington	640
Glaphorn	171
Grafton Underwood	70
Great Addington	131
Great Doddington	485
Great Harrowden	43
Grendon	257

Town/Parish	Council Tax Base 2024/25
Gretton	567
Hardwick	51
Hargrave	124
Harrington	74
Harringworth	139
Hemington	46
Higham Ferrers	2,916
Irchester	1,577
Irlingborough	2,823
Isham	342
Islip	291
Kettering	17,083
Kings Cliffe	621
Laxton	63
Lilford-cum-Wigsthorpe	55
Little Addington	144
Little Harrowden	345
Little Stanion	707
Loddington	214
Lowick	136
Luddington	32
Lutton	66
Mawsley	912
Mears Ashby	235
Middleton	199
Nassington	366
Newton Bromswold	31
Orlingbury	227
Orton	40
Oundle	2,261
Pilton	28
Polebrook	203
Pytchley	192
Raunds	3,499
Ringstead	504
Rockingham	51
Rothwell	2,897
Rushden	10,039
Rushton	259
Southwick	78
Stanion	416
Stanwick	704
Stoke Albany	162
Stoke Doyle	43
Strixton	16
Sudborough	105

Town/Parish	Council Tax Base 2024/25
Sutton Bassett	51
Sywell	377
Tansor	97
Thorpe Achurch	82
Thorpe Malsor	55
Thrapston	2,658
Thurning	50
Titchmarsh	252
Twywell	80
Wadenhoe	64
Wakerley	41
Warkton	63
Warmington	462
Weekley	76
Weldon	2,955
Wellingborough	16,293
Weston By Welland	86
Wilbarston	283
Wilby	228
Wollaston	1,245
Woodford	504
Woodnewton	231
Yarwell	243
TOTAL	115,847

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COUNCIL 7 December 2023

Report Title	Capital Budget Update 2023/24
Executive Member	Councillor Lloyd Bunday, Executive Member for Finance and Transformation
Report Author	Janice Gotts, Executive Director of Finance and Performance Janice.gotts@northnorthants.gov.uk

Are there public sector equality duty implications?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information (whether in appendices or not)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Applicable paragraph number for exemption from publication under Schedule 12A Local Government Act 1974	

List of Appendices

None

1. Purpose of Report

- 1.1 The purpose of this report is to request approval for works funded through borrowing and virements for capital schemes which are in excess of £0.5m. This is in accordance with the Council's Constitution, where new borrowing and virements in excess of £0.5m on capital schemes must be approved by Council.
- 1.2 Approval of the funding will allow the schemes to move forward to procurement and delivery. The Executive considered the Kettering Library Roof item at its meetings on 16th November 2023 and recommended that Council grant approval for the funding request as outlined in this report.
- 1.3 Approval to increase the capital budget by £0.790m for the A509 Isham Bypass and the recommendation for the virement of budget of the equivalent capital budget by full Council was approved by the Leader of the Council on 27th November 2023, in consultation with the Executive Member for Highways, Travel & Assets and Executive Director Finance & Performance (S151 Officer).

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 has completed 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.
- 2.2 The schemes have been approved by Executive with the recommendation that Council formally approve the funding routes in accordance with the Council's Constitution

3. Recommendations

- 3.1 It is recommended that Council:

a) Approve the funding for the following changes to the Capital Programme:

- i) 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) Isham Bypass – budget approval for a virement of £0.790m, £0.600m in 2023/24 and £0.190m in 2024/25 from the Integrated Transport Block budget for 2023/24 and 2024/25 to the Isham Bypass scheme.

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

- i) To enable the Council to continue to deliver its library functions within Kettering Town Centre.
- ii) To meet the requirements of the Department of Transport in the development of the road scheme for the Isham Bypass.

- 3.3 **Alternative Options Considered:**

- i) Further detail in relation to alternative options considered by the Executive for the above schemes are set out in the reports presented to Executive on 16th November 2023, as referenced in Section 8 of this report.
- ii) The funding options are recommended in light of the capital resources available to the Council.

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 Revenue Budget for 2023/24

- 5.1 **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.
- 5.2 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.
- 5.3 Further information on this scheme is available from the separate report to Executive on 16th November 2023.
- 5.4 The Council is requested to approve the borrowing requirement to fund the costs of the scheme.
- 5.5 **Isham Bypass – budget approval for £0.790m in 2023/24 £0.600m and 2024/25 £0.190m to be met through a virement from the Integrated Transport Block allocation to the A509 Isham Bypass.** The A509 Isham

Bypass forms the first part of a strategy to dual the whole A509 between the A14 south of Kettering and the A45 at Wellingborough.

- 5.6 As reported to Executive in November 2021, funding totalling £2.798m had been secured to develop the Outline Business Case and planning application for the scheme. Full Council in March 2023 agreed further additional funding of £1.573m for the next stage of the planning application. Due to further requests by the Department for Transport to update the traffic modelling for the scheme, and to allow for responding to queries from the Council's planning officers during their consideration of the planning application and the Department for Transport during their assessment of the Outline Business Case a further £0.790m is requested to comply with these requirements.
- 5.7 The following options for funding the additional costs of £0.790m have been considered:
- Seeking additional funding from the Department for Transport. This option has been rejected as the grant letter awarding £1.859m makes clear that the Council is responsible for all costs of producing the Outline Business Case above that funding.
 - Providing the additional funding through additional borrowing by the Council. This option is not preferred as it would add £0.055m/year (dependent on prevailing interest rates) to the Council's revenue budget for the next 50 years.
 - Ceasing work on the scheme. This option is not favoured because the A509 Isham Bypass is a significant infrastructure priority for the Council and to cease work on the scheme at this stage would mean that capital expenditure incurred to date would become a pressure on the revenue budget and the Department for Transport could seek reimbursement of the £1.859m grant received to date.
- 5.8 Council is requested to approve the virement of £0.790m from the Integrated Transport Block budget to the Isham Bypass.

6. Next Steps

- 6.1 Once funding is approved progress on the schemes can commence in line with the report to Executive for Kettering Library Roof and in accordance with the requirements of the Department for Transport for the Isham Bypass.

7. Implications (including financial implications)

7.1 Resources, Finance and Transformation

- 7.1.1 The additional budget requirements in this report are funded from the use of external grant and borrowing. The funding source for the scheme is set out in the recommendations in section 3 and within the scheme details as set out within section 5 of this 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.

7.2.2 The decision by the Leader on 27th November 2023 regarding Isham Bypass, was a special urgency key decision. The Chair of Place and Environment Scrutiny agreed that the taking of the decision could not be reasonably deferred prior to it being made, in accordance with Access to Information Procedure Rule 15 of Part 5.3 of the Council's Constitution.

7.3 Risk

7.3.1 The deliverability of the revenue budget is monitored by Service Managers and Assistant Directors across the Council. There is further review throughout the year reported through to Executive.

7.4 Relevant Policies and Plans

7.4.1 The schemes provide a strategic fit with the Council's priorities as set out within the corporate plan.

7.5 Consultation

7.5.1 The Capital Programme from 2023/24, as part of the Council's MTFP, was subject to consultation prior to approval by North Northamptonshire Council in February 2023. The budget was approved by Council at its meeting on 23rd February 2023 and was subject to consultation from 22nd December 2022 to 27th January 2023. These changes are in addition to the approved budget.

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 budget 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 revenue budget 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 were considered in relation to this report.

[Capital Programme Report 2023-26 - Feb Council.pdf \(moderngov.co.uk\)](#)

[Kettering Library Roof Replacement Exec report V1.pdf \(moderngov.co.uk\)](#)

[Constitution of North Northamptonshire Council](#)

[Decision of the Leader of the Council – Isham Bypass](#)

Full Council 7th December 2023

Report Title	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
Lead Member	Cllr Scott Edwards, Executive Member for Children, Families, Education and Skills
Report Author	David Watts, Executive Director of Adults, Health Partnerships and Housing (DASS) & Interim Children’s Services (DCS) Richard Woodward, Head of Business & Performance (Interim) ICF Programme Lead

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

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- Appendix A – Northamptonshire Children’s Trust Annual Report 2022-23
- Appendix B - Fostering Annual Report
- Appendix C - Adoption Annual Report
- Appendix D - IRO Annual Report 2023
- Appendix E - Sufficiency Strategy 22-25
- Appendix F - Commissioning Strategy
- Appendix G - LAC Modelling April 23 Draft v0.6
- Appendix H - NCT Improvement Plan March 23
- Appendix I - Full SEF ILACS 2022
- Appendix J - NCT Strategic Risk Register April 2023
- Appendix K - NCT Scorecard March 2023
- Appendix L – NCT 202223 Audit Assurance

1. Purpose of Report

- 1.1. To provide Council with an update on the progress of the 2022/23 Annual Review of the Service Delivery Contract (SDC) between Northamptonshire

Children's Trust (NCT) and West and North Northamptonshire Councils which includes the 2022/23 Annual Report.

2. Executive Summary

- 2.1 As part of the contractual arrangements between Northamptonshire Children's Trust (NCT) and North and West Northamptonshire Councils, there is a requirement to undertake an Annual Review and produce an Annual Report.
- 2.2 The purpose of the Annual Review set out in the SDC is:
- to consider the quality of practice in the provision of services and the outcomes for children, young people and families in the county of Northamptonshire.
 - to facilitate the Councils quality assurance of the operation of the SDC.
 - to enable the Councils to review the discharge of their statutory functions insofar as the same relate to the provision of the services by the NCT.
 - for all parties to consider whether changes are required to the SDC.
 - for the Councils and NCT to consider all applicable factors in relation to the setting of future contract sums paid to NCT including for the next financial year.
- 2.3 NCT produced a draft Annual Report (**Appendices A-L**) which was considered and agreed by the Operational Group in August 2023 in line with timescales and requirements set out in the SDC.
- 2.4 The Annual Review will be completed by the Strategic Group in October 2023 and will consider the Annual Report and if any changes to the SDC, which must be agreed by all parties, are required.

3. Recommendations

- 3.1. It is recommended that Council:
- a) Note that the Annual Report contained at Appendices A-L was completed in line with the service delivery contract.
 - b) Note that KPI's in the Service Delivery Contract (SDC) have remained the same since the start of the contract with Northamptonshire Children's Trust and that the Annual Review, completed by Strategic Group in October 23, will consider and agree any amendments to the SDC, including changes to KPI's.
 - c) Note that any changes to the SDC would need to be agreed by all parties, presented to Childrens Trust Joint Committee meeting for approval and once approved, be implemented by a Change Control to the SDC.

3.2. Reason for Recommendations

- The arrangements to complete the Annual Review and Annual Report are set out in the SDC and provide a procedure through which the Councils can review the Service Delivery Contract and NCT's performance in delivering its functions.

3.3. Alternative Options Considered

- Do nothing - Failing to complete the Annual Review or produce an Annual Report would not be compliant with the SDC and would not allow the Councils to formally review the contractual arrangements with NCT and agree changes. It should be noted that the SDC contains a process for the Councils to propose changes outside of the Annual Review if required.

4. Report Background

- 4.1 Following a statutory direction from the Secretary of State for Education, Northamptonshire County Council was required to oversee work towards the establishment of a Trust for the delivery of children's social care services in Northamptonshire, transferring operational control for children's social care services from the Council to the Trust. Upon the creation of the two new unitary Councils, the commissioning and ownership of NCT was transferred to North and West Northamptonshire Councils.
- 4.2 As part of the establishment of NCT, a suite of contractual agreements was put in place to govern the relationship between NCT and the Councils. The core contractual agreement is the Service Delivery Contract (SDC) and its associated schedules.
- 4.3 The SDC sets out the arrangements for the completion of the Annual Review of the Service Delivery Contract between Northamptonshire Children's Trust (NCT) and West and North Northamptonshire Councils.
- 4.4 The purpose of the Annual Review set out in the SDC is:
- to consider the quality of practice in the provision of services and the outcomes for children, young people and families in the county of Northamptonshire.
 - to facilitate the Councils quality assurance of the operation of the SDC.
 - to enable the Councils to review the discharge of their statutory functions insofar as the same relate to the provision of the services by the Trust.
 - for all parties to consider whether changes are required to the SDC.
 - for the Councils and NCT to consider all applicable factors in relation to the setting of future contract sums paid to NCT including for the next financial year

- 4.5 The SDC states that the Strategic Group shall complete the Annual Review at one of its scheduled meetings and that the Annual Report shall be considered as part of the Annual Review in Quarter 3 (starting in October) in each contract year.
- 4.6 The SDC states that prior to 1st October in each contract year Operational Group shall prepare an Annual Report. NCT are required to prepare a Draft Annual Report by 31st July for consideration and agreement by Operational Group.
- 4.7 The report was agreed by the Operational Group in August 2023 and will be considered by the Strategic Group in October 2023 as part of completing the Annual Review. This is a key component of the Council's strategic oversight and review of NCT.
- 4.9 The Annual Report was presented to the Children's Trust Joint Committee on 6th September 2023 to "Note that the Annual Report contained at **Appendices A-L** was completed in line with the service delivery contract". At the time of submitting the report to the committee NCT had yet to submit Appendix L – NCT 2022/23 Audit Assurance and as such the Committee were unable to note the report at the meeting. The report was also presented to the Executive at its meeting held on 16th November 2023.
- 4.8 The Annual Review, to be completed by Strategic Group in October 2023, will consider and agree any amendments to the Service Delivery Contract, including changes to KPI's.
- 4.9 Key Performance Indicators in the SDC have remained the same since the start of the contract with NCT. Proposed changes to KPI's in the 2021/22 Annual Review were not made following the ILACS inspection in November 2022.
- 4.10 Any changes to the SDC, including KPI's would need to be agreed by all parties, be brought back to a future Joint Committee meeting for approval and once agreed, be implemented by a Change Control to the SDC.
- 4.11 Certain changes to the SDC could be deemed notifiable changes. This means that changes cannot be made without the prior written consent of the Secretary of State for Education.

5. Issues and Choices

- 5.1 The content of the Annual Review is defined in the SDC and covers the following topics:
- the content of the Annual Report (to be received by Strategic Group in Quarter 3 (starting in October) in each contract year).
 - the contribution rates determined by the Fund Actuary pursuant to Schedule 10 (Pensions)

- any matters arising in relation to Schedule 5 (Financial Mechanism) (including whether the Contract Sum for the forthcoming Contract Year remains appropriate having regard to what is set out in the Annual Report)
- with effect from the Second Contract Year, the proportionate share of any Surplus that will be allocated to each Party pursuant to Schedule 5 (Financial Mechanism)
- the results of any audits carried out by the Council during the preceding Contract Year pursuant to the terms of this Agreement
- any significant complaints made against the Trust in respect of the preceding Contract Year
- serious incidents (including serious case reviews) involving the Trust in the preceding Contract Year
- a review of the Key Performance Indicators and the Services Specification
- a review of the Dependencies and the Support Services
- a review of the governance arrangements under this Agreement pursuant to Schedule 18 (Governance Arrangements) to assess whether they continue to be appropriate and fit for purpose
- such other matters that the Parties may agree from time to time.

5.2 At its meeting on 25th September 2023, the Council's Audit and Governance Committee considered a report on the assurance framework for NCT. This referenced the Trust's annual audit opinion for 2022/23 as provided by the Trust's chief internal auditor. The Committee expressed significant concern regarding the comparatively low level of audit coverage on which the opinion was based, including the number of risk-based audits specific to the Trust, and has sought urgent additional assurance on this and future arrangements for 2023/24 from the Trust. This was further enforced with a request from the Committee that a member working group meet with the Chair of the NCT Audit Committee to discuss the position and future audit plans. Arrangements for this are now being put in place.

5.3 The Annual Report references the NCT Finance, Resources and Audit (FRA) Committee's agreement to the auditor's annual opinion, which took place at its meeting on 28th September 2023, and after further information was supplied to the Committee. This followed the NCT FRA meeting in August when the Committee initially received the 2022/23 Head of Internal Audit Opinion. At this meeting the NCT FRA Committee was critical of the quality of the information provided and felt that there was insufficient evidence to give an opinion, which prompted the requirement for further details to be supplied to the September meeting.

6. Next Steps

6.1 Any proposed changes, once agreed by all parties, will be brought to a the Childrens Trust Joint Committee meeting for approval and once approved be implemented by a Change Control to the SDC.

7. Implications (including financial implications)

7.1. Resources, Financial and Transformation

7.1.1 The provisional outturn position for 2022/23 is £158.837m against the original Contract Sum of £137.450m resulting in an overspend of £21.387m. In accordance with the contract split percentage this equates to:

- NNC - £9.444m
- WNC - £11.943m

7.1.2 The outturn position for 2022/23 is still to be finalised and subject to audit.

7.1.3 In the Annual Report, NCT has identified potential issues that will impact upon its budget for the 2023/24 financial year. These issues are detailed in the report but are largely related to placements for children in care. The current levels of volatility, efficiency of joint funding processes and current flux of emergency placements, increasing complexity of need in a market where demand outstrips supply are all impacting on NCT's ability to meet children's needs within the current budget envelope.

7.2. Legal and Governance

7.2.1 The relationship between NCT and the Councils are governed by a series of contractual and legal agreements.

7.2.2 The recommendations set out in this report will allow the Councils to fulfil their responsibilities as set out in the Service Delivery Contract, the Articles of Association and Support Services Agreement.

7.2.3 The arrangements as set out herein represent good governance and maintain appropriate oversight of the Trust by the Councils.

7.3 Relevant Policies and Plans

7.3.1 The Council has identified 'Brighter, Better Futures' as a key priority of the corporate plan. This will be done by supporting partners and the Children's Trust to provide higher standards of support. The Annual Report enables the Council to gain oversight of the services delivered by NCT and to help the Council to understand how better support for Children, Young People and Families can be delivered.

7.4 Risk

7.4.1 An opinion of 'satisfactory assurance' has been given by the Trust's Head of Internal Audit in relation to the organisation's internal controls for 2022/23; however, a definition of 'satisfactory assurance' has not been provided within the report. The Annual Audit Report recognises that '2022-23 was a challenging year from an audit perspective'. The annual opinion is not based on outcomes from a completed, risk based Internal Audit Plan for 2022/23, as would be expected under the relevant Standards. The report includes two

finalised audit assurance reports from the Trust's 2022/23 Internal Audit Plan with assurance ratings. All other assurance opinions relate to assignments from the Trust's 2021/22 Internal Audit Plan (which was recognised by the Internal Auditors in 2022 as not suitably risk based) and a number of audits from West Northamptonshire Council's Internal Audit Plan - of which some resulted in opinions of limited assurance and none of which were Trust specific.

7.4.2 A total of four audits have been recorded as removed from the Trust's Internal Audit plan during 2022/23 - including Medium Term Financial Planning and Budget Management – which also limits the assurance to be gained in the year.

7.4.3 Coverage of the financial system audits delivered annually by Cambridgeshire County Council did not form part of the Trust's Internal Audit plan (and has not in prior years been referenced as a source of assurance in the Annual Audit Report). Whilst this may provide a source of wider assurance on hosted financial systems, it should not replace Trust specific, risk-based audit coverage.

7.5 Consultation

7.5.1 This Annual Report has been reviewed and agreed by the Operational Group and will be considered by Strategic Group in October 2023 as part of completing the Annual Review. These are the key contractual review meetings between the Councils and NCT.

7.6 Consideration by the Executive

7.6.1 This report was considered by the Executive at its meeting held on the 16th November.

7.6.2 The Executive noted:

- That the Annual Report contained at Appendices A-L of the report was completed in line with the service delivery contract.
- That Key Performance Indicators (KPIs) in the Service Delivery Contract (SDC) have remained the same since the start of the contract with Northamptonshire Children's Trust and that the Annual Review, completed by Strategic Group in October 2023, will consider and agree any amendments to the SDC, including changes to KPIs.
- That any changes to the SDC would need to be agreed by all parties, presented to Children's Trust Joint Committee meeting for approval and once approved, be implemented by a Change Control to the SDC.

7.7 Consideration by Scrutiny

7.7.1 This report has not been considered by the overview and scrutiny committees of either Council.

7.8 Equality Implications

7.8.1 There are no specific equality implications arising from this report.

7.9 Climate and Environment Impact

7.9.1 There is no specific climate or environmental impact arising from this report.

7.10 Community Impact

7.10.1 There is no specific community impact arising from this report.

7.11 Crime and Disorder Impact

7.11.1 There is no specific crime and disorder impact arising from this report.

8 Background Papers

8.1 None

Annual Report of the Service Delivery Contract between Northamptonshire Children's Trust (NCT) and West and North Northamptonshire Councils 2022/23

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 5. [Cost of delivering services in 2022/23](#)
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 10. [Any social, demographic or other relevant factors which may impact on the services](#)
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 17. [Strategic Direction](#)
- [Appendix 1 – Assurance and Governance structure](#)
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- [Appendix 3 – Supporting Data Analysis and NCT Performance Scorecard as at end March 2023](#)
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- [Appendix 5 – National Context](#)
- [Appendix 6 – NCT Annual Internal Audit Report 2022/23](#)

1. Background and Purpose of the Annual Review

Schedule 3 Annual Review in the Service Delivery Contract (SDC) details the overarching aims and objectives of the Annual Review:

- for the Parties to consider the quality of practice in the provision of children’s social care services delivered by Northamptonshire Children’s Trust (NCT) and the outcomes for children, young people and families in the county of Northamptonshire;
- to facilitate the Councils’ quality assurance of the operation of the Service Delivery Contract;
- to enable the Councils to review the discharge of its statutory functions delivered by NCT;
- for the Parties to consider whether changes are required to the Service Delivery Contract to be agreed at the Annual Review meeting
- for the Parties to consider all factors that may impact upon future Contract Sums and for the Strategic Group to make a recommendation/proposal to the Council regarding the Contract Sum payable to NCT for the next Contract Year.

The Annual Report forms part of the process of the Annual Review, the contents (as a minimum and where applicable) for the Annual Report are set out in 2.3. of Schedule 3.

The Operational Group reviews and agrees the content of the final Annual Report which is submitted to the Strategic Group for consideration as part of the Annual Review no later than 31st August or the date of submission of papers to the Strategic Group meeting in Quarter 3 (starting in October).

The governance and assurance arrangements for NCT are shown at Appendix 1.

2. Summary of NCT performance against the Key Performance Indicators

As part of the development of Northamptonshire Children’s Trust, 21 KPIs were agreed against which the councils would monitor NCT’s performance. These 21 KPIs are set out in Schedule 6 (Performance Framework) of the Service Delivery Contract. Schedule 6 also defines the targets NCT should be aiming to achieve against each KPI as well as the tolerance levels that are used when assessing whether there are performance issues or failures as defined in the Schedule.

NCT provide the Councils with a monthly performance report which outlines performance against each KPI as well as commentary and how NCT are working to improve. In addition to this NCT also provides a monthly Quality Assurance Report to the Social Care Improvement Board and Operational Group monitoring progress against the “Social Care Improvement Plan” and the “Children’s Trust Scorecard” with additional data about NCT’s performance.

A full list of KPI’s and summary of NCT’s performance against each of these in the 2022-23 contract year is included at Appendix 2 and the highlights are included below.

2.1 What worked well

- NCT achieved ‘*Requires Improvement to be good*’ Ofsted ILACS inspection judgements for North and West Northamptonshire in November 2022, reflecting an improvement in the performance, quality and outcomes for children since the 2019 ‘Inadequate’ rating of Northamptonshire County Council’s children’s services.
- The majority of performance indicators were at or within tolerance during 2022/23.
- Performance remained strong (above 90%) throughout the year for KPI 3 (single assessments taking place within timescale). The performance of this KPI was 95% in March 2023 and has been on target or above for 34 consecutive months.
- KPI 9 (percentage of care leavers aged 17-21 and in employment, education or training (EET)) and KPI 10 (percentage of care leavers aged 17-21 living in suitable accommodation) remained

better than the national averages¹. It has been above target since May 2022 and has spent the entire year above target.

- KPI 16 (% of social work vacancies) remains low (low is good) staying between 15-20% throughout the entire year, indicating that NCT are able to attract and retain social work staff. Whilst the proportion of social care posts filled with agency staff has remained within tolerance and was only slightly higher than the national average at the end of March 2023 (17.8% in comparison with 17% nationally), this, and the use of managed service teams² remain a concern in terms of continuity for families, sustainability and affordability. Despite ongoing national recruitment and retention challenges, NCT was in a better position than other children's services in the region by having a small net increase in permanent staff at the end of the financial year.
- KPI 18 (Average time between the LA receiving court authority to place a child for adoption and deciding on a match) has been below target (low is good) since April 2022 and stayed below target for the entire year. This can be attributed to strengthened family finding and matching processes which have been implemented alongside improved permanency tracking arrangements.
- KPI 19 (% of children in care placed for adoption within 12 months of an agency decision that they should be placed for adoption) has been above target (high is good).
- Compliments have continued to significantly outweigh complaints.

2.2 Challenges and areas to work on:

- KPI 1 (% of all referrals with a decision within 2 working days) has been a challenging area for most of the financial year. The measure has been below tolerance since September 2022, making it below tolerance for the final 7 months of the annual period.
- KPI 5 (% of Child Protection Conferences held within 15 days of a strategy discussion being initiated) has also been a challenging area. Performance was below tolerance (low is not good) for 6 consecutive months from October 2022 – March 2023.
- A range of factors have contributed to below tolerance performance for these two KPIs, including increases in demand; business support vacancies and a requirement to achieve vacancy factors on NCT staffing budgets; multiple systems used in MASH and turnover of staff. Actions to address these issues have been identified, are being progressed and reported to the Councils.
- As defined in the SDC, a monthly KPI falling outside of the relevant tolerance for three (3) consecutive months or more is defined as a "Performance Failure". Performance Failures can trigger a formal process being initiated by the Councils. These Performance Failures were dealt with informally during 2022/23, with regular reporting to Operational Group.
- KPI 6 (% of children that became the subject of a Child Protection Plan for a second or subsequent time) has been an area that fluctuated between being above tolerance (low is good) in June, September and November 2022 and then within tolerance or at or below target for the remaining months of the financial year. The impact of the Covid 19 pandemic and the cost of living challenges have been contributing factors, as has the robustness of the process when families are 'stepped down' from statutory interventions so that outcomes can be sustained; action is being taken to address these factors through the Early Help, Neglect and Exploitation multi agency action plans; and internally within NCT the step down process between Social Care and Child and Family Support Services will be reviewed and strengthened by Q2 of 23/24.

¹ 63% of NCT care leavers were in employment, education or training as at the end March 23 in comparison with the national average of 58% (2022; latest available figures); 95% of NCT care leavers were living in suitable accommodation as at the end of Mar 23 in comparison with the national average of 89% (2022; latest available figures).

² As at the end of March 23, NCT has 3 managed service teams, these are teams of qualified social workers and managers supplied by an external organisation and have been used to mitigate the impact of the national shortage of qualified social workers.

- KPI 11 (Social workers with caseloads above target) has remained within tolerance as NCT has taken action with use of agency staff and managed service teams to mitigate increases in demand and national recruitment and retention challenges. This continues to be a priority focus to enable manageable caseloads and the phasing out of managed service teams by Apr 2024.
- KPI 8 (Children in care with 3+placement moves in the last 12 months) has remained within tolerance, however placement stability remains a priority and implementation of the sufficiency action plan has progressed in 2022/23 with actions to achieve improvement in this area.
- Implementation of Circle to Success started before the end of the financial year and one of two new emergency children's homes partially opened, with full opening of this and the second home due in Q1 of 23/24. An additional 5 bed children's home was included within a block contract in 22/23 and plans are progressing for a DfE capital funded home utilising a WNC owned property for 4 children due to open in Q2 of 23/24. Progress has been slower on developing an additional 4 bed children's home due a suitable property not yet being identified, and an additional 2 bed home development delayed due to the interface with residential short breaks for children with disabilities.
- Re-commissioning of NCT's children's homes, fostering and independent supported accommodation frameworks is in train, for new frameworks to be in place for Apr 24. Recruitment of NCT foster carers has continued to be prioritised, also within a challenging national context, as has supporting retention of existing carers. 19 additional foster carer households were approved in 22/23, however 23 closed therefore creating a net loss of 4 households. The average utilisation rate of NCT fostering households in 22/23 was 69%, just above 68% in 21/22. The non utilised places includes those that aren't available. There was a lower proportion of vacant places that could be used in 22/23 at 4% in comparison with 9% in 21/22 showing that better use was being made of existing NCT fostering households in 22/23.

3. Service Delivery

3.1 Children and Family Support Services (CFSS/Targeted Early Help) and Youth Offending Service (YOS)

Services

- **Targeted Partnership Support in the Localities and MASH** - West and North locality arrangements for practitioners with countywide support and management
- **Targeted Strengthening Families Team** - West and North locality arrangements for practitioners with countywide support and management
- **Adolescent Services**
- **Missing & RISE (sexual exploitation)**
- **Early Help Board**
- **Youth Offending Services**
- **Data Management** – for supporting families payment by results

Context

The purpose of Early Help is a whole system approach to prevention and intervention. It is a way of working, and everybody's business. It is about working in a collaborative way to support children, young people, and families to build on their strengths, overcome challenges and make positive changes for themselves. By acting early, we can prevent problems from getting worse and help children, young people and families to find the right solutions that will support and improve their life opportunities. Additionally, a strong early help offer reduces the need for statutory intervention later on. NCT deliver targeted early help through the Children and Family Support service (CFSS) as part of the partnership offer.

The 2022 ILACS inspection found that:

- *‘Children in need of help and protection receive much better support than they did at the time of the inspection in 2019’.*
- *‘Leaders have developed and implemented an early help offer’.*
- *‘Early help has been strengthened and children are identified early when they need help. While there is sometimes a short delay before intervention, children and families benefit from an increasing number of services which, for many, help to improve their lives’.*

A new partnership Early Help Improvement Strategy and Action Plan is launching in Q2 2023 to support progress in this area. NCT is also supporting the West and North unitary councils to write their own Early Help strategies and action plans, and linking NCT work with other strategies, such as the SEND Strategies.

Through partnership working, data has shown an increased use of early help assessments. NCT have also improved the early help model of reporting around family and closure summaries.

Northamptonshire Youth Offending Service (NYOS) is hosted by NCT. NYOS works with the North and West Northamptonshire Councils and partners such as Health, Police, Education, Community Safety Partnership, and other key stakeholders to deliver the best outcomes for children, young people, and our community. In general, data shows an improvement in Northamptonshire’s youth offending, in comparison to the increase which is being seen nationally and regionally.

The YJSIP (Youth Justice Sector Improvement Partnership) peer review in January 2023, reported:

- The service is ‘impressive,’ it is innovative, creative and child focused
- YOS practitioners and managers were not only committed, but they also went above and beyond with the young people and the relationships built are fantastic
- The improvements in the past three years are clearly evident.
- The partnership is becoming more robust with supportive, child centred relationships

3.2 Children’s Social Care Services - Children’s Social Care Multi-Agency Safeguarding Hub, Assessment services and Safeguarding

Services

- **The front door** - Multi-Agency Safeguarding Hub (MASH) – Countywide
- **Assessment** – West and North locality arrangements for social work and family support workers (FSW) with countywide support and management
- **Safeguarding** – West and North locality arrangements for social work and family support workers (FSW) with countywide support and management
- **Emergency Duty Team** (EDT)– Countywide; with proposal that adults EDT services will be transferred to WNC/NNC

Context

Partnership working is a basic but key requirement and legal duty across all areas of safeguarding services. Working Together 2018 is the statutory guidance that outlines the requirements to safeguard children and it makes it clear that everyone who works with children has a responsibility to keep them safe and no one agency can do this alone. The guidance sets out key roles for individual organisations and agencies to deliver effective arrangements for safeguarding. It is essential that these arrangements are strongly led and promoted at a local level, specifically by local area leaders, including Local Authority/Trust executives and Lead Members of Children’s Services, the Police, Fire and Crime Commissioner, Integrated Care Board (ICB) and through the commitment of the Chief Officers in all organisations and agencies. Partnership working has improved since the implementation of NCT but continues to be an area for ongoing development.

The purpose of the Safeguarding services is to manage the ‘front door’ for statutory social work (MASH) and to support and protect children who meet the threshold for statutory social work e.g. children in need; children subject to child protection plans; children subject to private proceedings;

children subject to Public Law Outline (PLO) pre-proceedings; and initiation of care proceedings if required. The Safeguarding service also supports children in care subject to S.20 voluntary care arrangements if there is an imminent plan for them to return to the care of their family.

The Emergency Duty Team (EDT) also falls within the Safeguarding service remit and the forthcoming Exploitation hub will be managed within Safeguarding. EDT currently delivers services for both children and adults. They work closely with social care teams and partner agencies across the county. Work is progressing to disaggregate the EDT service so that NCT can focus solely on their core business.

NCT is committed to developing the MASH into a service which provides children and young people with timely responses from the most appropriate agency/professional to support families to thrive and stay together wherever possible. MASH is a screening, information-sharing, and decision-making process and they do not case hold so when the decision has been made about the most appropriate outcome for a child/ren, the case is submitted to the relevant operational team to progress, signposted or is closed. Due to the continued and increasing business demands, the Safeguarding Partnership agreed to an independent review of the 'front door' to improve the service which will take place in Q2 of 2023/24.

NCT Duty and Assessment teams provide a countywide statutory social care service and complete single assessments over a 6 week period to identify and support the needs of children and families. Short term intervention is offered during the assessment period where appropriate. Children's cases then either transfer to an appropriate team e.g. Safeguarding, Children in Care or step down to Early Help services or close if no further action is required. Business needs and pressures have continued to increase which can impact on performance for example management oversight and supervision is not consistent. However, positively, timeliness of assessments remains good and above the national average. Due to national and local pressures around the recruitment and retention of 'front door' social workers, a managed service team has been in place to mitigate for vacancies and manage caseloads.

There are 15 Safeguarding teams across the service who are based in localities. Safeguarding teams protect, support and offer services to children in need, children subject of child protection plans, and children subject of private proceedings and pre-proceedings (PLO). They work with children and families with long term complex needs that sometimes necessitate legal proceedings and/or S.20 voluntary accommodation arrangements. Due to national and local pressures around the recruitment and retention of Safeguarding social workers, two managed service teams have been in place to mitigate for vacancies and manage caseloads.

The 2022 ILACS inspection found that:

- *'Referrals about children in need of help and protection are identified promptly and responded to by staff in the multi-agency safeguarding hub. However, some referrals are not transferred quickly enough to the duty and assessment teams, even when it is immediately evident that a fuller assessment is required'*
- *'Thresholds are applied well and investigations are undertaken effectively, which result in appropriate actions to safeguard children'*
- *'Assessments undertaken by the duty and assessment service vary in quality'*
- *'Most child protection core group and child in need meetings are held regularly and include key agencies. However too many children's plans end prematurely when agreed actions have been completed but desired outcomes have not always been achieved, particularly for children living in situations of long-term neglect'*
- *'Work with families at the pre-proceedings stage of the Public Law Outline has been strengthened significantly since the last inspection. This work has had a positive impact and enables many children to remain at home safely, avoiding the need for court proceedings and for them to come into care to secure their safety'*

Since the inspection the multi-agency Neglect Strategy and action plan has been developed and training rolled out for practitioners.

3.3 Corporate Parenting

Services

- **Court** – Countywide
- **Children in Care including Life Story work** – West and North locality arrangements for social work and family support workers (FSW) with countywide support and management.
- **Family time (children in care’s contact with birth families) services** – West and North locality arrangements for practitioners with countywide support and management
- **Fostering** – Countywide. Due to being a Children’s Trust, the fostering service is classified as an independent fostering agency
- **Adoption** – Countywide. Due to being a Children’s Trust, the adoption service is classified as a voluntary adoption agency
- **Care leavers** – West and North locality arrangements for practitioners with countywide support and management.
- **Management of Children’s Homes** – countywide
- **Disabled Children** – countywide – providing specialist statutory social care support to children with disabilities whose needs range from children in need, child protection to children in care.

Context

The purpose of the Corporate Parenting service within NCT is to deliver high quality, effective services for every child and young person in our care and support for those in the court system. The role that Councils and Children’s Trusts play in looking after children is one of the most important things they do. They have a unique responsibility to the children they look after and their care leavers (relevant and former relevant children). A strong ethos of corporate parenting means that sense of vision and responsibility towards the children they look after and their care leavers is a priority for everyone.

Corporate parenting is an important part of the Ofsted inspection framework and the corporate parenting principles are referenced in Ofsted’s Inspecting Local Authority Children’s Services (ILACS) framework. The corporate parenting principles are about embedding a positive culture in the Local Authority towards looked-after children and care leavers and their success will depend on the extent to which Directors, Councillors, Heads of Service and front-line managers champion and promote understanding of them. Achieving this to a ‘good’ standard will require close collaboration between NCT, each Council and partner agencies and extends far beyond ensuring that corporate parenting boards effectively discharge their duties.

NCT has committed to classifying care experience as a protected characteristic to support and advocate for the children and young people in our care and who NCT have cared for.

We have an increased focus on life story work, ensuring that staff are trained to understand the importance of chronologies and genograms to children and young people, and to support them to review their life story at an appropriate time. Social workers encourage children to attend their review meetings or obtain their views and advocate for them if they do not wish to attend. Care plans are more child centred.

At the 2022 ILACS, inspectors found:

- *‘Overall quality of practice for children in care and care leavers has improved since the previous inspection, particularly regarding adoption, although considerable variability remains’.*
- *‘Most children come into care when it is necessary and appropriate for them to do so. For most children, particularly very young children, this is planned and timely’.*
- *‘Reviews for children in care are timely and minutes are sensitively written to children’*

- *'Children in care are supported to take part in a wide range of leisure and social activities. Their talents are promoted and celebrated. As a result, children have fun, make friends, develop a sense of achievement and feel proud of themselves'.*
- *'Unaccompanied asylum-seeking children are well supported and provided with help in line with their assessed needs'.*

In relation to children with disabilities, inspectors found:

- *'Practice in the disabled children's team to assess and support disabled children and their families as stronger. Social workers know their children well and use a wide variety of communication styles to gain the child's voice'.*
- *'For older disabled children in care, planning for their transition from receiving support and accommodation from children's services to being supported by adult services starts too late'.*

In relation to care leavers, inspectors found:

- *'Personal advisers take time to build relationships with care leavers. They often work persistently to address issues and advocate for young people to access services in their efforts to support them. Young people who spoke to inspectors described personal advisers as 'amazing' and 'brilliant'. Some care leavers have experienced changes in personal advisers, which has affected the quality of their relationship and support. A few care leavers have been introduced to their personal advisers very late, causing anxiety about the transition towards independence'.*
- *'Most care leavers are well supported into education, employment or training. They are supported by their personal advisers to maintain their educational placements and to do well at university'.*

3.3.1 Circle to Success

In 2022/23, the Councils agreed a significant investment (£1.3m) in the Circle to Success programme to be delivered within NCT, in partnership with Impower and Innovate. The programme began in January 2022 for 12 months and is working to achieve the following outcomes:

- Children and young people's needs are understood, and permanency is achieved within homes where they can flourish
- Children and young people who are unable to live with their parents are cared for by carers who provide a secure base through the provision of therapeutic parenting and enjoy meaningful relationships with parents and/or significant people in their lives
- Professionals working as part of the team around children work from a therapeutic care perspective and are skilled in completing evidenced based assessments to inform care planning
- Sufficiency requirements for homes for cared for children and care experienced young adults are understood and commissioning arrangements ensure that children receive care in the right setting at the right time and that value for money is achieved.

Experience of similar programmes in other areas has shown an initial period of approximately 6 months of training, testing and iterating is required before any benefits are realised, with full realisation of benefits after 2-3 years. The savings target for the Circle to Success programme for 2023/24 is £3.8m

Initial work during Q4 2022/23 included training social workers to complete Valuing Care assessments of an identified cohort of children to better understand needs and opportunities to return home or move to a placement that better met their needs; recruitment of resilience foster carers. From Q1 23/24 children will begin to receive therapeutic interventions.

3.3.2 Fostering

Fostering annual report:



3.3.3 NCT Residential Children's Homes

Home	Last Full inspection date	Grading	Monitoring visit	Comments
Thornton House URN 2608872	<u>11th January 2023</u>	Requires improvement to be good	Improved effectiveness	Opened Jan 2020 Interim inspection 9 March 2022
Phoenix House URN 2608892	<u>7th February 2023</u>	Good	20 th -21 st October 2020	Opened Feb 2020
Welford House URN 2608968	30 April 2019 October 2021 <u>15th November 2022</u>	Good Good Good	24 Feb 2021	Interim Inspection 4 March 2020
Raven House URN 2615067	April 2019 11-12 Aug 2021 <u>9th August 2022</u>	Good Good Good	22-23 Sep 2020 12 Nov 2020	The assurance visit resulted in a restriction notice from 28 September which was lifted 20 Dec 2020.
Arnold House URN 2616670	2-3 rd July 2019 17 -18 May 2022	Requires improvement to be good Good	17 June 20 22 July 20 13-14 October 20 26 Jan 21 Jun 21 <u>Nov 29th, 2022</u>	N/A

3.3.4 Adoption

NCT Adoption Annual Report:



3.4 Commissioning and Quality Assurance

Services

- **Quality Assurance (QA)** – Countywide with West and North locality focus
- **Voice of children and young people** – Countywide with West and North locality delivery
- **Commissioning including Placements for children in care**– Countywide
- **Independent reviewing officers (IROs)** – Countywide
- **Designated Officers (LADO)** – Countywide with locality leads
- **Independent visitors** – Countywide with West and North locality delivery

- **Child protection conferences** – Countywide with conferences taking place in locality areas
- **Social work academy** – Countywide
- **Policy and Inspection support** – Countywide with West and North locality focus depending on requirement e.g. Ofsted

Context

The purpose of the Quality Assurance & Commissioning services within NCT is to deliver high quality, effective and objective quality assurance and commissioning at the individual, service and strategic level, in order to improve the experiences and outcomes of the children we support and to achieve best value. The service also drives the implementation of NCT's Quality Assurance Framework, children and young people's Engagement Strategy, Commissioning Strategy, Sufficiency Strategy and Equalities Strategy. As with other areas of practice, the QA&C service must be able to respond to increases in demand and complexity for social care services.

The service makes a significant contribution to the delivery of NCT's workforce strategy by delivering and commissioning an effective continuous professional development offer and pathways into children's social work roles.

Quality Assurance & Commissioning is responsible for following functions:

- Independent Reviewing Officers and Child Protection Chairs and business support for child in care reviews and child protection conferences
- Designated Officers
- Principal Social Worker
- Quality Assurance manager and auditor
- Co-ordination and support of volunteer independent visitors for children in care
- Advocacy for children who are supported by NCT
- Leading and contributing to multi agency safeguarding quality assurance, case reviews and other partnership activity to improve outcomes for children e.g. MARAC, MADRA, NSCP sub groups
- Social Work Academy and learning and development. This includes supporting newly qualified social workers during assessed and supported year in employment (ASYE), social workers recruited from abroad and routes into social work posts (i.e. student placements, apprenticeships)
- Continuous professional development for NCT workforce
- Children and young people's engagement officers and leadership
- Inspection preparation and support, including self- assessment and regional improvement
- Leading the delivery of equality strategy and action plan
- Production and co-ordination of NCT policies and procedures
- Commissioning, including developing and undertaking joint commissioning with partners
- Brokerage of homes for children and bespoke support for children and families

Independent Reviewing Officers (IRO) annual report:



IRO Annual Report
2023 fin.pdf

NCT's Sufficiency and Commissioning Strategies



Sufficiency Strategy
22_25 Final.pdf



Commissioning
Strategy.pdf

The 2022 ILACS inspection found:

- *'Active and influential groups exist for children in care and care leavers to contribute to improvements in the trust. The experiences of children, young people and families who use the services are important to leaders. An up-to-date Engagement Strategy and participation framework promote participation and the feedback is then used to inform service and strategic developments'.*
- *'Most children in care live in good-quality placements, including specialist provision that meets their needs well'.*
- *'A small number of children live in unregistered children's homes. While senior managers quality assure and monitor all these placements and are working with providers to seek registration, leaders accepted during this inspection that their oversight has not been robust enough to be assured that the welfare of every child living in these arrangements is being protected'.* Action has subsequently been taken to strengthen this oversight.
- *'Leaders understand the need to develop sufficiency of placements and are proactive in developing the right services for children and families. Forward plans, as well as responsiveness to changes in demand, are creating a much more resilient workforce and range of services to meet levels of need, such as increasing the capacity of social work and leaving care teams. Progress is being made to develop placement capacity through an ambitious sufficiency strategy'.*
- *'Staff development is highly valued and supported through the social work academy, which is helping to stabilise the workforce'.*
- *'Leaders know the service well and are realistic about the scale of the ongoing improvement journey. However, they recognise that there has been some over optimism on their part about the quality of services for some specific cohorts of children'.*
- Inspectors identified NCT's *'strengths-based quality assurance framework'* as an area of improvement since the previous inspection.

4. Summary of the Councils' Performance of its obligations in the SDC and SSA

4.1 Support services summary

A wide range of support service provision is provided to the Children's Trust by North Northamptonshire and West Northamptonshire Councils. This arrangement is set out within the Support Services Agreement (SSA) between the parties. Performance is reviewed by the Support Services Board which is chaired by NCT's Director of Finance and Resources and attended by officers from both Councils. In 2021/22, the health and safety function transferred into NCT and in November 2022, the majority of children's learning and development functions transferred into NCT. Both of these transfers were as a result of Support Services Change Control.

In March Q4 22/23, a total of 38 KPIs were reported. Of these, 34 reported a green outturn (89.5%). Three reported an amber outturn (7.9%). Two of these related to the percentage of incidents resolved within agreed performance standard thresholds in terms of response and resolution times, and one was in response to the percentage of reactive maintenance tasks completed within priority timescales. One KPI reported a red outturn (2.6%) due to loss of IT systems (at least 72 hours) occurring (reported as estimated user culminative hours). Six further KPIs have not been reported with 2 of those currently unable to be reported upon. Performance of the Support Services' KPIs are shown in Appendix 3.

The quality and detail of the performance reporting on Support Services has been excellent and has allowed NCT to hold the Councils to account for performance. Overall, services have performed strongly, and service leads have worked closely with NCT colleagues to support them on their improvement journey. The Support Services Board have reached a level of maturity where issues and risks can be worked through in a solution focused way understanding that cooperation builds stronger

performing Services. In 2023/24, the Councils, working with NCT are undertaking a cost review of all Council provided Services to refresh the work initially undertaken during the setup of the Trust.

Significantly, over the coming 4 years, the Trust is working with the West on an exciting IT refresh programme, funded by both Councils, where all individual devices will be replaced ensuring the workforce are equipped with the technology to support their roles.

Where changes are made to Support Services, the Councils will consult with NCT to understand their impact and to consider how services can be best delivered in the future.

Some services have performed strongly, and service leads have worked closely with NCT colleagues to support them on their improvement journey, for example the Complaints service has strengthened the support provided to NCT which has improved NCT's response to complaints.

4.2 Retained functions and their interface with NCT

The Councils' retained services have continued to establish and develop following the local government reorganisation and disaggregation of services that were previously delivered on a countywide basis. The Councils now have their own Directors of Children's Services, previously this was a joint post. As each Council develops its own strategies, boards and delivery groups, NCT officers are increasingly required to produce more information and attend more meetings. This is impacting on capacity.

The Councils are also working to improve the services they continue to deliver, especially around support for children with special educational needs and disabilities (SEND). This is being led by the SEND Accountability Boards which has representation from NCT. Any future transformation of SEND services will have an impact on NCT.

The Councils have continued to deliver a satisfactory Intelligence Client Function to manage the contractual relationship between the Councils and NCT.

4.3 Property

When formed and now, NCT occupies 29 buildings across Northamptonshire with 17 in the West and 12 in the North. It was recognised that due to historic underinvestment, the quality of the buildings, NCT are delivering services from is poor and that the pace at which the Councils have acted to rectify this has been slow. This was hindered in 2021/22 by the disaggregation of the property support service delivered to NCT and the need to put in place appropriate systems and processes. This meant that NCT are often delivering services in buildings that are not fit for purpose and poses an operational risk, especially where buildings are used by children and families such as children's homes, children's centres and buildings used for family time.

Maintenance, refurbishment and equipment in property has been a standing item of concern at the monthly Operational Group. Significant progress has been made in 2022/23 with a programme of priority works agreed with each Council informed by condition surveys, however maintenance, refurbishment and equipment replacement schedules have remained slow to clarify. Timeliness of works in children's residential homes has been noted by Ofsted. Many buildings, such as the Weston Favell centre require urgent refurbishment works and equipment refresh.

This year, NCT alongside the ICF have been working together to rectify this through a number of mechanisms:

- Accommodation Strategy
- Following submission by NCT of the medium-long term accommodation requirements, work has been undertaken with the Councils to identify locations and premises more suited to locality working. Intensive work during the end of 2022/beginning 2023 has led to a set of options proposed by the Councils, this includes looking at both the existing Unitary estate and where required, the wider market.

- Plans for a programme of works and scheduled development will be developed into Autumn 2023.
- Using data from site condition surveys, NCT has been working with the Councils individually to agree a schedule of planned maintenance which will bring buildings up to standard. Funded via the Councils' Capital Works Programme, this begins to address priority works within current sites. NCT will continue to work with both Councils and the ICF to agree and deliver an accommodation strategy aligning this with the strategies of both Councils
- Monthly operational SLA meeting with North and West Property teams are now in place.

NCT continues to work with both Councils to review its future property strategy and how this aligns with the strategies of both councils in a collaborative way. A practical example of this was seen via the closure of Lodge Road and the development of the Abbey in Daventry.

Children's Homes Development – This year has seen significant development within our existing residential homes and the development of further capacity to begin to meet sufficiency requirements. Working closely with the North and West property teams, key maintenance requirements have progressed along with planned works in response to Ofsted recommendations.

In November 2021, NCT submitted bids for capital funding to the Councils for a new four bed children's home and renovations to an existing property (John Greenwood Shipman) to create a two bed children's home provision. Capital funding was approved by the councils in November 2022. Searches for a suitable property for a new four bed children's home, led by WNC, took place from February 2023. As at the end of March 2023 searches were continuing. The renovations at John Greenwood Shipman were postponed in Q4 of 22/23, due to the ongoing discussions with Council and Health Chief Executives in relation to the redesign of residential short breaks services which are delivered from John Greenwood Shipman.

Capital investment and suitable properties have been identified by the Councils and work undertaken to develop residential capacity has seen a detailed programme of works developed which delivers 10 new places and 15 new block contract places. Both of these provide examples of NCT and the Councils working together to deliver improved value and better outcomes for our looked after young people. This year also saw the successful bid to the DFE to secure £202,191 for the development of a new home in the West, where the Unitary provided a building as match funding. This is due to be opened by the end of September 2023. NCT continues to work with the Property teams in the North and West to explore opportunities for joint working to deliver better value and improved outcomes through investment and utilisation of the Unitary estate.

Supported accommodation - This year has also seen progression in plans to offer accommodation and support to care leavers. With an aim of reducing cost and improving outcomes for NCT's care leavers, a programme of in-house provision and strategic partnerships has been developed. 25 beds are planned for delivery over the next 12 months with additional properties regularly reviewed with the hope of adding to the portfolio. Reviewing new properties, whether part of existing unitary stock or on the open market, is done in close consultation with NNC & WNC Property teams. The supported element of the accommodation is designed to speed and aid the transition from care to independent living and ultimately increase the chances of the moves being successful. This includes access to University of Northampton accommodation, a partnership assisted by WNC and an HMO in Wellingborough leased from NNC is in the process of being commissioned. Further properties from both NNC & WNC are being explored and a partnership with the YMCA is also developing

4.4 Procurement for NCT data, databases, and casework records

The current children's social care case management system used by Northamptonshire Children's Trust, CareFirst (provided by OLM), has been in use since 2005 and has for some time been considered to be at the "end of life". Case management systems are a vital part of the delivery and

the improvement of Children's Social Care, providing the foundations for performance management, quality assurance and statutory reporting.

During 2019, Northamptonshire County Council awarded a contract with OLM Eclipse for the provision of a new children's and adult social care Case Management system and associated finance modules. Implementation commenced with adults, which went live ahead of the Councils' vesting day. Post-vesting day, the programme was transferred to joint responsibility between the Councils and NCT. The Eclipse Implementation programme team undertook an implementation readiness review and identified significant concerns with the application of the system to Children's Social Care.

In February 2022, it was concluded that there was no way forward with the current OLM Eclipse contract and therefore a new procurement is now needed. The decision not to implement the system has knock on effects on NCT's ability to deliver savings agreed as part of the contract sum negotiations for the 2022/23 financial year as well as the ability to deliver improvement in services.

Funding has been approved by the Councils and the Councils and NCT are currently working together to procure a new system for the end of the current contract in January 2025, with a significant amount of pre-procurement work in progress and the establishment of a Programme Board chaired by WNC Chief Executive. The Councils funded staffing cost for system development which will transfer to WNC in April 2023.

The Councils have also agreed funding for a new case management system for Adoption and Fostering, with procurement due to conclude in Q2 of 2023/24 (see 4.9 below).

4.5 Transfer information from government, information regarding partnerships, policies and procedures and casework records to NCT

This has been delivered by the Councils and the Councils and NCT continue to work together in partnership to improve services delivered to children, young people and families in Northamptonshire.

4.6 Act as the Corporate Parent

Elected members and the officers are the corporate parents for Northamptonshire's children in care and have a collective responsibility across services and local authorities to safeguard and promote their life chances. North Northamptonshire Council and West Northamptonshire Council have ensured contribution from education and other retained children's services, housing services and the Council's universal services in supporting children in care. Both Councils have an offer for care leavers relating to council tax. However, both offers are different and this has been raised by the Northamptonshire care leavers group and is being discussed through the Corporate Parenting Board.

During the financial year 2022-23, the Corporate Parenting Board met five times, and remained a single entity covering the whole county. It was chaired by both councils' elected Lead Members with Cabinet responsibility for children's social care. NCT provides professional expertise and advice to the Corporate Parenting Board, in order to help the councils discharge their responsibilities.

Aside from its own annual report, during 2022-23 the Board received and scrutinised annual reports from the Independent Reviewing Officer Service, fostering and adoption services, the Virtual School, and the Integrated Care Board. Statutory health assessments remained an issue of intense scrutiny for the Board, but members were somewhat reassured by the remedial actions being undertaken.

Every Board meeting included a scorecard of selected metrics, prompting debate and challenge from Board members. This showed recovery in terms of some key health-related metrics and continuing strong performance in terms of care leavers in employment, education and training. Ad-hoc and thematic reports to the Board included a detailed presentation around the sufficiency of foster places and the challenges therein; services available for young people leaving care, including disparities in council tax exemption schemes between the two councils; an update on a national safeguarding review for children with disabilities in residential placements; and care-experienced people's contact with the criminal justice system.

Although there is more to do, the Board made sure young people's voices were heard and utilised. A care-experienced young person was recruited to the Board as a full member, and the Board liaised with the NCT's participation groups. In many cases, young people contributed to the reports and presentations which came to Board, particularly the leaving care item. Every Board included a dedicated slot for celebrating the achievements of children and young people, and a very successful celebration event took place in July 2022 with children nominated for awards in four categories.

An LGA diagnostic of Corporate Parenting was completed in 2022/23 which identified a range of strengths, areas for consideration, opportunities and risks; and suggested next steps to improve impact for children, including:

- Getting on the same page – what is corporate parenting?
- Strengthening the overall governance and impact of the CPB
- Developing the confidence to challenge effectively and be a 'critical friend'
- Understanding the effective use of data to make a difference as a corporate parent
- Building IT skills and using children and young people's media effectively listening and responding to children and young people including use of surveys
- CPB members visiting/shadowing children cared for and leaving care teams to understand the child's journey and experiences
- Making sure you use regional forums/networks for learning and support
- Visiting and learning from other CPB's and modelling how they do business
- Mutual observation and feedback from the CPB Chair from another council

4.7 Consult NCT on any corporate or property strategy

The Councils have consulted with NCT on various corporate or property strategies. NCT submitted property requirements in March 2022. Each organisation has considered where their staff will work from and how their decisions in this area impact upon each other.

Property and Support Services arrangements are a standing item at the monthly Operational Group. Although significant progress has been made, maintenance, refurbishment and equipment replacement schedules have remained slow to clarify. Timeliness of works in Children's Residential Homes has been noted by Ofsted. Many buildings, such as the Weston Favell centre require urgent refurbishment works and equipment refresh.

4.8 Support NCT with grant funding

The Councils have supported NCT with accessing any grant funding and both NCT and the Councils recognise that they should work together to maximise the funding available for services by taking advantage of any opportunities. Any in-scope grants such as the Supporting Families Grant and funding for Unaccompanied Asylum Seeking Children (UASC) have been passported to NCT as part of the contract sum. Improved performance by NCT on delivering outcomes for children and families has meant an increase in funding available as part of the Supporting Families Programme.

In 2022/23, NCT and the Councils were successful in bidding for capital funding from DfE for a new children's home, utilising a WNC owned property, due to open in September 2023.

4.9 Implement any actions resulting from a regulatory inspection

Services delivered by NCT were subject to numerous regulatory inspections in 2022/23. There were many recommendations from these inspections that have been incorporated into the improvement plan. Two key actions for the councils have been identified and are still outstanding:

- Extension to Thornton House children's home – Ofsted inspections in December 2021 and March 2022 made the recommendation under the children's homes regulations 2015 for an extension to be made to house a sleep in and wash area for staff as well as extra storage space for the young people. Capital funding was agreed in Q4 of 2022/23 and the project is due for completion in Q3 23/24.
- Implementation of a new case management system for Adoption and Fostering – Ofsted noted the current electronic recording system used by the Fostering agency does not enable good

quality tracking and does not meet the needs of the Adoption agency. Funding has now been agreed and procurement is expected to conclude in Q2 23/24.

There have also been a number of external and peer reviews undertaken during 22/23 and it is important that NCT, WNC and NNC continue to work together to address issues identified within these.

4.10 Ensure NCT is adequately insured

The provision of Insurance to NCT is governed by the Support Services Agreement and is delivered by NNC. NCT were adequately insured during the contract year.

4.11 Procure provision of appropriate ICT to enable the Emergency Duty service

This was successfully delivered by the Councils.

5. Cost of delivering services in 2022/23

5.1 Contract Sum

The provisional outturn position for 2022/23 is £150.066m against a net budget of £128.631m resulting in an overspend of £21.435m. However, an additional investment of £11.891m was agreed during 2022/23 reducing the overspend to £9.544m. In accordance with the contract split percentage this equates to:

- NNC - £4.215m
- WNC -£5.329m

This included £0.728 for managed service teams and £2.062m inflationary increase of 3.2%.

In year funding was received from NNC and WNC of £3.575m reducing the additional funding requested from the councils to £17.860m, £7.887m for NNC and £9.973m for WNC.

In accordance with the agreement made at Strategic Group in November 2022, 2022/23 additional costs relating to placements and transport pressures were funded to the year-end actual position. Risk around the forecast remains due to increasing placement demand and price both locally and nationally and the contribution from partners around joint funding arrangements.

An external review of NCT's Placements Commissioning (February 2022), found that progress had been made to strengthen arrangements relating to joint funding of packages and this was evidenced in additional funding contributions; however, there are opportunities to embed this further and re-balance the proportionate contributions from different agencies, accompanied by clearer representation and accountability at decision-making panels. The review found that decisions regarding levels of funding contributions were not informed by an agreed protocol and decisions have to be separately ratified within individual agencies outside of the Multi Agency Resource Panel (MARP). There also appeared to be no established process or protocol for agreeing additional funding contributions where the overall package cost increases.

The review identified that for all children in care, NCT/social care meet 96% of the cost of those placements, in comparison with other areas where education and health ordinarily contribute approximately 20% and 21% of cost of placements respectively.

Subsequent to the review, work was undertaken to develop a joint protocol however this had not been agreed by the end of 2022/23.

The cost of performing the services in 2022/23 can be summarised as follows:

Summary	Gross Budget excl one-off Investment	Less Income	Net budget		Exp Forecast (Incl. actuals)	Income Forecast (Incl. of actuals)	Net Forecast Outturn	Variance before agreed additional Investment	Additional Investment agreed in 22/23 contract Sum	Net Variance
	£'000	£'000	£'000		£'000	£'000	£'000	£'000	£'000	£'000
Staffing	46,782	-4,334	42,448		49,306	-4,334	44,972	2,524	2,524	0
Other non-Staff costs	343	0	343		343	0	343	0	0	0
Placements	60,648	-7,380	53,268		77,695	-7,602	70,093	16,825	7,743	9,082
Contracts	4,767	0	4,767		4,767	0	4,767	0	0	0
Children's Homes	3,484	0	3,484		3,762	0	3,762	278	104	174
Legal	4,700	0	4,700		5,065	0	5,065	365	0	365
Adoption	7,046	-100	6,946		7,890	-100	7,790	844	844	0
Transport	1,930	-566	1,364		2,779	-566	2,213	849	676	173
Other care	6,554	-353	6,201		6,484	-372	6,112	-89	0	-89
NCT Central - Other budget	133	0	133		133	-161	-28	-161	0	-161
Support Services / SLA	4,977	0	4,977		5,482	-505	4,977	0	0	0
Grand Total	141,364	-12,733	128,631		163,706	-13,640	150,066	21,435	11,891	9,544

The contribution rate determined by the Fund Actuary was 16.8%.

5.2 Key Issues

Staffing (£2.524m overspend)

The overspend related to the adoption of the national pay offer of £1,925 per FTE and the continuation of managed service teams due to increased demand.

Placements (£16.825m overspend)

Placements remains the biggest single risk and is incredibly volatile. NCT continues to mitigate and negotiate to secure placements at a lower cost. However, the market and availability of placements remains extremely challenging and the inflation pressures from the independent sector is in excess of budgetary provision, this trend experienced during 2021/22 has continued into 2022/23. The placements budget will continue to remain under significant pressure as it remains extremely volatile both locally and nationally.

NCT did not receive demographic growth as part of the contract sum negotiations, NCT proposed the creation of a placement reserve representing 10 -15 % of the overall placements budget, excluding inflation elements above the contract sum. This was an alternative to demographic growth as the impact of the Covid 19 pandemic became clearer. As part of the contract sum 22/23, NCT received an inflationary increase of 3.2 %. This is against the backdrop of higher than projected inflation costs, which based on the Consumer Prices Index (CPI) stood at 10.5% in the 12 months to December 2022.

As NCT has evolved significant mitigation measures to manage costs have been implemented. This was supported through the 22/23 contract discussions between Sept 2021 and Dec 2021. It was agreed to put mitigation in place and deal with pressures as they arose during 22/23. As practice in an inadequate children's social care system evolves more measures can be put in place to mitigate demand. In 2019/20 external placement costs were £44.5m, whereas in 2021/22 they were £44.9m. The development of the initial contract sum for the period Nov 2020-Mar 2022 included the delivery of £4.4m savings linked to placements. This amount was removed from the initial contract sum. A further £2.5m of placements savings was removed from the budget in 2022/23, linked to the development of two new children's homes provisions and partner contributions to placement costs. The development of the children's homes was dependent on capital funding from the councils, purchase and refurbishment of a property, and refurbishment of existing property. Councils' approval of capital funding for these projects was received in November 2022. The second element of the placement savings related to increasing the joint funding contributions to placements from partners and to commission an independent review and benchmarking analysis. This would result in the

development of a joint funding protocol. The joint funding protocol had not been agreed by the end of March 2023.

Legal (£0.365m overspend)

The legal demand pressure for the 22/23 financial year was £365k, this was due to inflation increase above the contract sum and increasing demand in legal matters. A fee increase of 4% was implemented from November 2022 and there are concerns in relation to potential for retrospective charges and late billing. The table below breaks the demand over the past four years. The key element is the increase in demand from 3,978 in 2019/20 to 4,659 in 2022/23.

Historical Invoice Splits	FY19-20	FY20-21	FY21-22	FY22-23
Time	£2,614,260	£2,906,534	£2,922,700	£3,158,928
Disbursements	£1,875,919	£1,715,047	£2,260,926	£1,906,274
Total	£4,490,179	£4,621,581	£5,183,627	£5,065,202
Average cost per billed matter	FY19-20	FY20-21	FY21-22	FY22-23
Total	£1,000.00	£1,074.00	£1,115.00	£1,105.00
Time only	£554.00	£680.00	£631.00	£693.00
Disp only	£446.00	£394.00	£484.00	£412.00
Matters Billed	3,978	4,147	4,557	4,649

Despite the increased demand the transformation workstream has had a number of successes in terms of cost mitigation and also improving the understanding of the data.

- Our 3 biggest areas of transformation focus in 22/23 were Counsel (QC & Junior), Expert fees and emails received. These 3 areas are £245k underspent compared to last year.
- Acknowledging that demand has increased there are 90 more matters billed to Dec 2022 than Dec 2021. With an average cost per matter last financial year of £1,115 that is worth £100k
- Removal of legal team attendance as standard from weekly Gateway meetings at the start of the financial year avoided c£90k.

Adoption (£0.844m overspend)

The overspend is related to the implementation on the Local Government Ombudsman's decision on the historic uplifts of allowances.

Transport (£0.849m overspend)

The overspend relates to inflationary pressures which is consistent with the pressures in both councils in the provision of home to school transport. Work is ongoing with the Councils to finalise the year end forecast position and also the development of the service for 2023/24. Work to develop an SLA is focused on improving forecasting from the system used to source transport and improved journey planning and procurement. The transport hub will continue to review each case to minimise cost and reduce demand.

Savings Programme

The full savings programme delivery of £2.99m is contained within the outturn position. Including £2.45m relating to children's homes capital projects and increased contributions from partners as agreed in the contract sum for 2022/23.

Savings Delivery – 2022/23

Area	Description	Target FY 2022/23	R	A	G Inc. Mitigations	Narrative – May 2023
Staffing	A full service review is underway around the support functions within the Trust in order to streamline operations. Support services are disaggregated across the trust leading to duplication and inefficiency. There are a number of legacy systems and processes, which are being reviewed to ensure a safe transition to the implementation of the new ways of working. The delivery of savings is dependent upon the investment in IT infrastructure, including the implementation of a new social care case management system to maximise resources and deliver efficiencies.	£0.330m	£0.013m	£0m	£0.317m	<ul style="list-style-type: none"> Original savings dependent on case management system Mitigation non delivery of original savings <ul style="list-style-type: none"> Reconfiguration of business support Weekly Recruitment Panel's 9.6FTE Business Support vacancies held pending restructure £275k (22/23 only). Transport Hub vacancy £28k deleted PA Team post deleted - £14k (Part Year)
Placements £2.450m	The development of the placement sufficiency strategy and the development of the in house fostering capacity.	£1.250m	£1.111m	£0	£0.139m	<ul style="list-style-type: none"> NCT are forecasting 30 fostering approvals with a net growth of -6 households and planned increases to children's homes capacity has not taken place resulting in non delivery of £1.250m savings NCT's Provisional Outturn reported at OG in May 2023 a pressure of £5.206m to joint funded income of which £1.200m is non delivery of expected savings. NCT have reported savings/cost avoidance of £2.312m for 22/23 through price negotiation and regular review of placements. The ICF has validated the calculations for these.
	Placements (£1.2m) – Review of Joint Funding arrangements as part of the multi-agency resource panel process	£1.200m	£1.200m	£0	£0	
	Placement mitigations through price negotiation and regular review of placements	N/A	£0	£0	£2.312m (Mitigation)	
Transport Review	This is a continuation of savings programme around the development of an efficient service, robust placement and threshold management and annual review. The processes are now in place and work will continue to deliver further efficiencies in this area.	£0.100	£0.019m	£0	£0.081m	<ul style="list-style-type: none"> Forecasted demand has increased by 12%, cost per journey by 25% since 2021 Reduction in declined journeys delivered £81k savings It is likely that this will continue felt with circa £122.5k savings yet to be defined
Legal Services Review	Undertake a review of the use of Legal services and a gateway approval process. 2022/23	£0.110m	£0m	£0	£0.232m	<ul style="list-style-type: none"> Shift from using Counsel - £17k Rationalization of meeting attendance - £90k Reduction of cost per matter - £125k Overperformance of savings delivery by £0.122m
		£2.990m	£2.343m	£0m	£0.769m (savings) + £2.312m (mitigation) = £3.081m	

Income Summary 2022/23

- Joint Funding invoiced: £6,135,000
- Grants £14,076,000. Grant funding is generally paid to the Councils and is passported to NCT as contract income and contract variation income.
- Other income £1,480,000. This includes contract variations, investment income, carry forward reserves, recovery of payments, income to support Newly Qualified Social Workers in their assessed and supported year in employment.
- Capital - NCT does not hold capital funding. Children's homes projects and foster carers are funded by council capital funding.

6. A summary of any Changes to the SDC

The following changes were agreed through the change control process:

- Support Services agreement** – *in light of the disaggregation of previously countywide learning and development services, it was agreed to transfer the L&D children's team and functions to NCT. The remaining L&D SLA with North Northamptonshire Council covers access to non-children's services specific training, e-learning, L&D business systems consultancy and e-learning development and apprenticeships.*
- Strategic Group** – *Inclusion of additional members*

7. Service demand in 2022/23 and expected demand 2023-25

7.1 2022/23 Demand

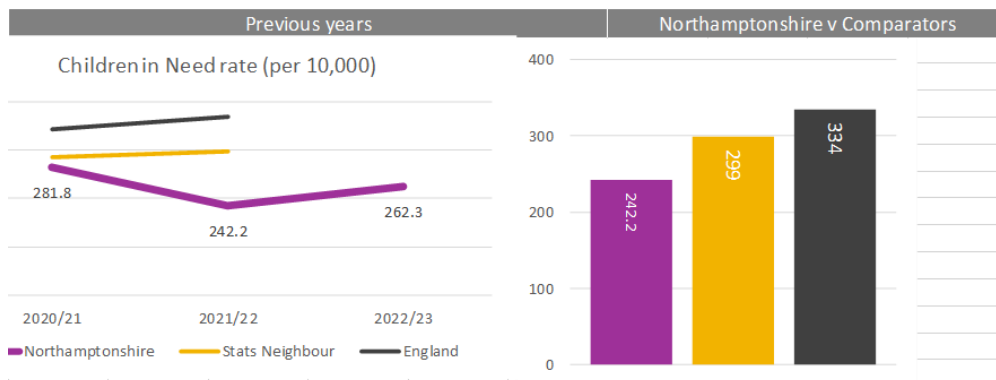
2022/23 saw an increase in demand for NCT services including:

- Number of families allocated to Children and Family Support Services (101 more in 22/23 than in 21/22)
- Number of referrals to MASH (3,231 more in 22/23 than in 21/22)
- Number of assessments (592 more in 22/23 than in 21/22)
- Number of s.47 investigations (803 more in 22/23 than in 21/22)

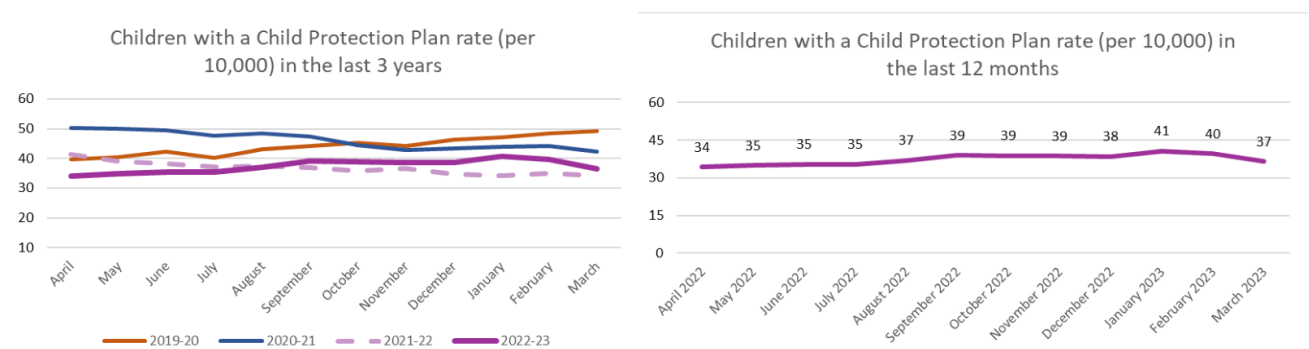
This is likely due to the rising cost of living, the continuing impact of the Covid 19 pandemic and impact of universal services not operating as normal during the pandemic, underdeveloped early help partnership offer, and an increase in the complexity of needs of children and risks of exploitation. The

rate of children in need, children on a child protection plan and children in care all increased in 22/23 in comparison with 21/22.

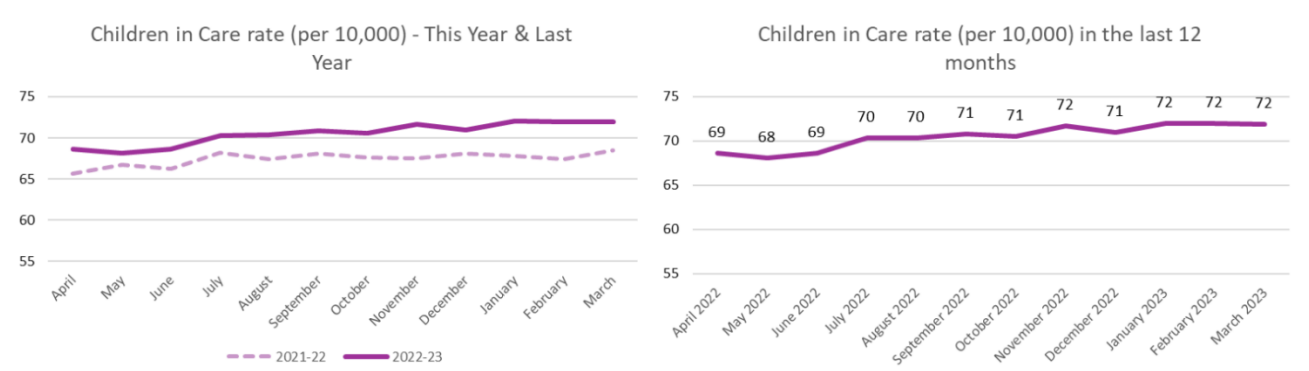
The rate of children in need was 262.3 per 10,000 at end of March 23, an increase from 242.2 in 21/22. This equates to 295 additional children. The rate was below both national and statistical neighbour rates.



The rate of children on a child protection plan was 36.5 per 10,000 at end of March 23, an increase from 34.1 in 21/23. This equates to 34 additional children. The rate was below the England national average and above our statistical neighbour rates.



The rate of children in care was 71.9 per 10,000 at end of March 23, an increase from 68.5 in 21/23. This equates to 46 additional children. The rate was above England and statistical neighbours.



7.2 Predicted Demand for 2023/24

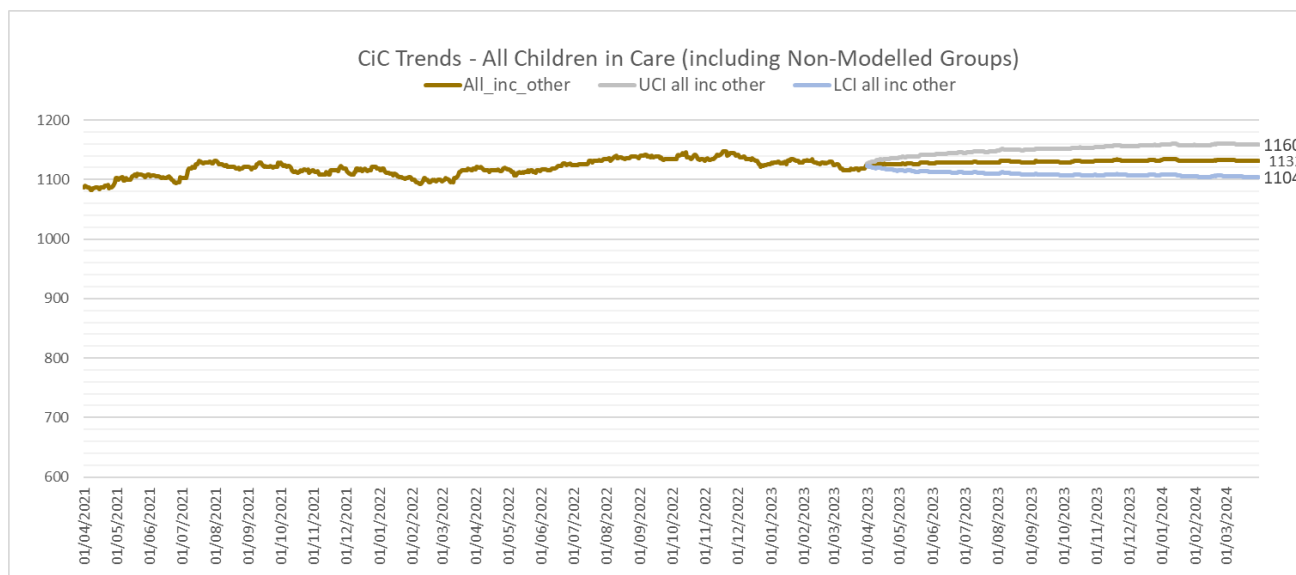
The current and forecast numbers of children in care and the expected demand for placements are included in the document below. The care population (excluding Unaccompanied Asylum Seeking Children (UASC)) has increased 1% from 1118 at the end of March 2022 to 1224 at the end of March 2023.

The current and forecast numbers of children in care and the expected demand for placements are included in the document below.



LAC Modelling
Apr23 draft v0.6 - 1Y

Trend- All Children in Care, Excluding UASC



An increase of 1% up to 1132 is forecast to March 2024. We are forecasting an increase of children in care in the 1-4 years and 16-18 years age groups in this period.

Care Leavers

As at March 2023, there were 891 care leavers aged 16 and above. Our projections tell us that this population is likely to grow to 1080 by March 2024, however, since March 2022 the population of care leavers has decreased by 49 young people (from 940). As per the table below, the number of 16 and 17 year-olds has increased and the number of young people aged 21+ has decreased. We can still expect the number of care leavers to increase in the next couple of years due to the number of young people currently in care aged 15-17 years-old.

Leaving Care Cohort by Age	Total (March 2022)	Total (March 2023)
16	258 (14 of whom are relevant so no longer in care)	293 (9 of whom are relevant so no longer in care)
17		
18	146	152

19	140	136
20	165	155
21	100	72
22	55	36
23	47	28
24	29	16
25	0	3
Total	940	891

During 2022/23 as the Councils and the ICB further developed, there has been an increase in localised strategy development and delivery. Whilst there are many benefits to the new organisational structures and ways of working, this has an impact on NCT's capacity because there are now North and West based strategic, operational and task and finish groups that NCT is requested to participate in to deliver partnership strategies. North and West based strategies and partnership delivery groups that NCT participate in include:

- Local Area Partnerships
- Community Safety
- SEND
- Early Help
- Family Hubs
- Corporate Parenting Boards
- Housing

8. Actual or anticipated changes in legislation and their effects

8.1 Stable Homes, Built on Love: Government response to reports on Children's Social Care

In February 2023, the government announced its implementation strategy in response to the publications of Josh MacAlister's Independent Review of Children's Social Care 2022, The Child Safeguarding Practice Review Panel's recommendations following the tragic deaths of Arthur Labinjo-Hughes and Star Hobson, and the publication on Children's Social Care by the Competition and Markets Authority 2022.

The government set out its vision for reform of children's social care, based on of six pillars, underpinned by a £200 million investment over the next two years to address urgent issues facing children and families.

The six pillars are:

1. Family Help provides the right support at the right time so that children can thrive with their families
2. A decisive multi-agency child protection system
3. Unlocking the potential of family networks
4. Putting love, relationships and a stable home at the heart of being a child in care
5. A valued, supported and highly skilled social worker for every child who needs one
6. A system that continuously learns and improves, and makes better use of evidence and data

The government has consulted on the proposals, seeking views on its responses to various recommendations, including support and protection for children and families, support for kinship carers and wider family networks, reforms to the experience of being in care, including corporate parenting, support for the workforce and delivery and system reform.

Each pillar maps to the outcomes and enablers within the proposed Children's Social Care National Framework and Dashboard, published alongside the strategy, which was also subject to consultation.

A third consultation was published on proposals for the child and family social worker workforce. The proposals included a set of national rules on engagement of agency social work resource, including price caps on what local authorities may pay for an agency worker, post-qualified experience needed for an agency assignment, use of project teams, references, notice periods and movement between agency and substantive roles, collection and sharing of pay and agency data and adherence of procurement routes with the national rules.

The consultation feedback is being analysed by the government and a response is anticipated.

8.2 Unregulated and unregistered placements

Since September 2021, it has been unlawful for any looked after child under the age of 16 years to be housed in a placement setting which is unregulated or unregistered with Ofsted. The rationale for this legislation is recognised and supported. However, there are national placement sufficiency challenges which mean these legislative changes places additional pressures on localities.

The vast majority of our children in care live in homes that are suitable for their needs. During 22/23 there has continued to be a small number of young people in unregistered placements in this context of national challenge in placement sufficiency. The number of children in unregistered provision has reduced since the ILACS inspection in October 2022. For these children we have in place senior manager oversight, consideration of risk and robust support plans, consultation with all parties, legal advice, discussion with the providers about their status and encouraging registration, and communication with Ofsted. Regular reporting on unregistered placements is in place to DCSs, Operational Group and Social Care Improvement Board.

Ofsted are taking enforcement action, which may mean some CQC registered care providers and providers of independent supported accommodation cease operating. Until there is sufficient registered provision available locally/nationally that can meet the needs of children, we are likely to continue seeing increasing costs as local authorities compete for places. Work continues to deliver our sufficiency strategy to increase access to local, suitable homes for children that can meet their needs, including working with the councils to identify potential properties for new children's homes.

8.3 National standards for providers of supported accommodation

From 28th April 2023, under the Supported Accommodation (England) Regulations 2023, supported accommodation providers in England will be able to register with Ofsted. It will be illegal for a supported accommodation provider to operate if they have not submitted a complete application which has been accepted by 28 October 2023. Providers with evidence of a live, accepted application can still accommodate young people aged 16 and 17 until their registration comes through.

NCT's commissioning team has been and will continue to support providers through registration, including signposting and sharing of national guidance. The general feedback from providers on NCT's framework is that they will be registering and close monitoring will take place to ensure this happens within the above timescales.

There is likely to be a financial impact for local authorities as registration will cost providers between £4,500- £5,500 (according to size). Providers will then be required to pay an annual fee. This is still under consultation and will be published in 2024; the initial proposal was between £2,700 and £3,000. Providers are also likely to require changes in their staffing to support the registration requirements which would increase costs to commissioners.

8.4 Inspection of Local Authority Children's Services

In January 2023, 'the experiences and progress of care leavers' was incorporated into the Inspecting Local Authority Children's Services framework for ILACS standard and short inspections.

In March 2023, Ofsted confirmed that they will be undertaking two separate inspections of NCT, one for North Northamptonshire and one for West Northamptonshire. The inspections will take place at

the same time, with two lead inspectors, two inspection teams and will produce two separate reports. This will have resource implications for NCT to manage two inspections at the same time.

8.5 SEND and Alternative Provision improvement plan: Right Support, Right Place, Right Time (March 2023)

The SEND and Alternative Provision Improvement Plan sets out how the government plans to work alongside children, young people and their families, and those who work across every part of the SEND and alternative provision system, to deliver improvements for every child and young person with SEND and in alternative provision.

The proposals aim to:

- Fulfil children’s potential so that children and young people with SEND or attending alternative provision enjoy their childhood, achieve good outcomes and are well prepared for adulthood and employment;
- Build parents’ trust through an easily navigable system across health, education and care, which restores confidence that their children will get the right support, in the right place, at the right time;
- Provide financial sustainability so that local leaders can make best use of record investment in the high needs budget to meet the needs and improved outcomes for children and young people, while ensuring local authorities remain on a stable financial footing.

The implementation will be led by the councils with NCT being a key partner.

8.6 Family Hubs

The councils are leading on the development of Family Hubs, with NCT as a key partner.

The Family Hub and Start for Life Programme is now being rolled out across North Northamptonshire. Key areas for support include mental health during pregnancy and beyond, parenting, infant feeding and home learning to promote early language and literacy development.

8.7 Integrated Care Systems

Integrated Care Systems are now in their infancy. The ambition is to create greater integration of health and care services, improve population health, reduce inequalities, support productivity and sustainability of services and help the NHS support social and economic development. More care in people’s homes and the community will be provided and will be led by the needs of the local area within a broad national framework. The CYP Transformation Programme, as part of the ICS in Northants is focusing on system improvements and priorities for children, with the NNC Chief Executive as the sponsor.

9. The strategic priorities and outcomes for the Services

The Strategic Priorities for the Services are set out [in Northamptonshire Children’s Trust’s Business Plan](#) for 2023/24-2026/27. This Plan was approved by NCT’s Board and by the councils through the [Children’s Trust Joint Committee on 15th February 2023](#).

This sets out NCT’s vision to place “Children, Young People and Families at the heart of all we do – in every action we take and every action we make.” To fulfil this vision NCT have identified the following priorities:

- Effective leadership
- Recruit, retain and develop an awesome workforce
- Strong relationship-based practice
- Insightful quality assurance and learning
- Healthy partnerships
- Robust and effective resource management

These priorities have been developed to enable NCT to achieve their identified outcomes for children, and young people:

- Live safe, be safe
- Fulfil potential
- Develop resilience
- Enjoy good health and wellbeing

Our progress against the priorities set out in the Business Plan are tracked through the Improvement Plan linked below, which is reviewed monthly and reported to Operational Group and the Social Care Improvement Board.



NORTHAMPTONSHIRE CHILDREN.pdf

10. Any social, demographic or other relevant factors which may impact on the services

10.1 Impact of Covid-19, the cost of living crisis and its impact on children & families

Post-pandemic, there are higher levels of need amongst children and families and children's social care and partner organisations are carrying a greater level of risk. This is typical of the national picture³ with an increase of children in care (see figures in Section 7) and complexity of children's needs, which is putting pressure on the availability of placements, within a market which does not meet the needs of children (as identified in the Independent Review of Children's Social Care⁴ and the Competition and Market's market study of children's social care⁵). Families continue to present with complex, multi-layered needs which are more acute. The rising cost of living has also had an impact on the volume of re-referrals (see ADCS safeguarding pressures report at footnote 3), as well as influencing social workers to work for agencies as take home pay rates are more attractive.⁶ There is also increasing demand and waiting lists for partnership services, including ADHD and ASD assessments and domestic abuse support.

10.2 Asylum seekers from Afghanistan

In the period 2022/23 there were 57 Unaccompanied Asylum-Seeking Children from Afghanistan receiving a service from Northamptonshire Children's Trust: 28 care leavers and 29 children in care.

10.3 Timeliness of initial and review health assessments for children in care

The timeliness of initial and review health assessments for children in care has been unsatisfactorily below target for some time. As at the end of March 2023, 55% of children in care had an initial health assessment within 28 days of becoming looked after, and 66% of children in care had an up to date health review. These are undertaken by the children in care health team commissioned by the NHS. This could mean that that the health needs of some of our children may not be understood or supported in a timely way. NCT have reviewed and improved our processes within NCT and continue to work with health colleagues to take action to address the issue and the impact is being monitored at board level.

³ see ADCS [Safeguarding Pressures Phase 8 Executive Summary FINAL Dec 2022](#))

⁴ [Independent review of children's social care - final report \(publishing.service.gov.uk\)](#)

⁵ [Final report - GOV.UK \(www.gov.uk\)](#)

⁶ [Children's social work workforce, Reporting year 2022 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](#) shows agency workers increase 13% from 21 to end of 22. Regional and local intelligence tells us it is agency pay, backed up by the controls the government have consulted on.

10.4 Impact of historical poor social care practice and previously under-developed early help offer

Prior to NCT being in place, children's social care in Northamptonshire was found to be inadequate by Ofsted. Serious case reviews and child safeguarding practice reviews have also identified previous inadequacies⁷. There is a historically underdeveloped early help offer from children's services and the partnership. The impact of this previous poor practice mean that children and families did not necessarily receive the right support at the right time, and in some instances, this continues to have an impact on children's outcomes now, as identified in quality assurance activity and inspections. It also meant agencies were more likely to refer to children's social care when a child was not at risk of significant harm because they did not feel there was sufficient early help available. This also created a poor reputation for Northamptonshire which can influence our partnership working, ability to secure placements and attract social workers. While improvements are being felt, it will take some time to change the reputation and fully develop the early help offer across our system.

10.5 West and North Northamptonshire school place planning and SEND forecasts

10.5.1 North Northamptonshire

From 2011 to the Census in March 2021, the overall population of children and young people aged 0-19 grew by 9%, or 6,800 people, to approximately 85,500 people in total. The profile of the population got slightly older. The number of children aged 4 or under fell by 4%, to around 20,000, whereas the number at school age (aged 5 to 15) increased by 7,500 or 18% to 50,000. The number of young people aged 16 to 19 stayed the same at 15,000. There was growth of 9% in the number of households with couples with dependent children (to 30,600), but growth of 20% in the number of households with grown-up children (to 9,500), and 17% growth in the number of lone parent households (to 16,300).

These figures are taken from the Census because the ONS has only published estimates for mid-year 2021, the Census was only shortly before that, but comparing Census figures allows us to see trends over the last ten years as well.

Primary

The demand for primary school places in North Northamptonshire is broadly reflective of national trends. The increase in the demand for places experienced since 2010, is forecast to plateau and decrease in the period ending 2023/28, despite ongoing local large scale housing developments. NNC are forecasting overall falling rolls across primary schools in the majority of planning areas with some localised spikes in demand. As a consequence, all the planned new schools which are proposed as a result of Housing Developments are being reviewed to ensure that any new provision meets an identified need and does not create unnecessary surplus capacity. NNC are working with schools to address forecast surplus capacity issues by proactively reducing published admission numbers and reutilising unused space to meet SEND or other needs.

Secondary

The larger cohorts of students that are moving through the primary phase of education continue to move into the secondary phase in North Northamptonshire. The total number of students expected to attend a Northamptonshire secondary provision is forecast to increase slightly, by 129, from 2023 to 2029 (1%), but this masks variations between planning areas in terms of total change and the profile of that change over the forecasting period.

Certain planning areas are experiencing pressure on specific year groups which is impacting on the availability of places for in year applications which have increased significantly over the last 12

⁷ [Child Safeguarding Practice Reviews - Northamptonshire Safeguarding Children Board \(northamptonshirescb.org.uk\)](http://northamptonshirescb.org.uk)

months. NNC have negotiated a number of bulge classes within Secondary Schools to contribute to meeting the in year pressures. Weldon Village School which will grow to be 8 FE opens its doors Sept 2023 and as it fills will relieve pressure across the Corby area. Hanwood Park Secondary School is in development and planned to open in Sept 2026, this will provide much needed places across Kettering. Further temporary expansions will be required to meet pressure in this area in the meantime.

SEND

The forecasts suggest that numbers of children with SEND, special schools, SEND units, resourced provision and independent special schools will grow over the forecasting period. This is in line with previous trends showing 10% growth each year for the past 3 years. However, pressure on alternative provision will stabilise as capacity is increased through a range of new provision.

As a result of a sufficiency review undertaken by NNC, a new approach to SEND early help funding has been introduced into mainstream schools alongside SENIF plus for the early years sector, increasing investment in Early Help by over £2.5 million. The implementation of the funding is part of the locality wide SEND offer to schools.

The findings from the review also highlighted the need to develop more unit provision across each of the four local areas in North Northants. To date 32 additional places have been secured in existing or new SEND units. Further work is ongoing to further develop unit provision, with the aim of increasing unit provision by up to 100 further places.

10.5.2 West Northamptonshire

The demand of the school places in West Northamptonshire is broadly reflective of national trends. Reception intake numbers peaked in 2017/18 - there were 4,080 children on roll in reception in January 2007, according to census data, compared to 5,075 children on roll in January 2017. This represented an increase of 995 new starters and can be linked to consistent increases in live births between the period 2003-2012. Since this time, birth rates have either dropped slightly or have plateaued. As of January 2023, there were 137 fewer reception children on roll compared to January 2017.

Of the three main drivers of the increase in the demand for primary school places that occurred over the previous decade: a rising birth-rate, high levels of inward-migration and large-scale housing development, only the latter still appears to be a major factor in West Northamptonshire. Primary projections forecasts indicate that there will be a decrease in the total number of pupils attending a primary school over the next 5 years, by around 3%, should current trends continue.

The latest birth rate data (taken from GP registration data) shows a 2% increase in births in 2022 compared to the previous year) and could suggest a change in the recent pattern and if that continues and the surge in house building across West Northants continues the reduction in primary school place provision would start to increase again in the coming years.

SEND

West Northants continue to see increase in demand for assessment and a significant increase in approved EHCPs. The forecasts suggest that SEND Numbers for special schools and SEND units will continue to grow. As with other areas the growth trend is showing 10%.

As a result, in 23/24 there will be a review of their structure and additional resources to enable statutory duties to be met, to ensure demand is managed and most of all ensure children's needs are met.

Partnership working with SEND is pivotal and this is an area which continues to be developed and strengthened. The new co-produced SEND and Alternative Provision Strategy helps to identify and

agree the priorities for the local area partnership for 2023-26. The OFSTED/CQC SEND Inspection is expected during 23/24 and inspection readiness will be key.

In WNC, there are plans to open more than 600 specialist SEND education places in the next 3 years and further work is ongoing around further provision to ensure needs of children with SEND are met.

11. The results of any audits or surveys in 2022-23

11.1 Internal audit

Audits undertaken in 2022/23 covered strategic and operational reviews for the Trust, and the summary includes audits of support services provided to the Trust. We can provide assurance that the Trust has established adequate, appropriate, and effective controls which help ensure that risks are being managed and objectives achieved.

The role of internal audit is to provide an opinion to the Trust, through the Finance, Resources and Audit Committee, on the adequacy and effectiveness of the internal control system to ensure the achievement of the organisation’s objectives in the areas reviewed. The annual report from internal audit provides an overall opinion on the adequacy and effectiveness of the organisation’s risk management, control, and governance processes, within the scope of work undertaken by Internal Audit. The basis for forming our opinion is as follows:

- An assessment of the range of individual opinions arising from risk-based audit assignments contained within internal audit plans that have been reported throughout the year.
- This assessment has taken account of the relative materiality of these areas and management’s response to agreed actions.
- Management investigation and response to issues raised from fraud investigations.

The annual audit and statement of assurance for FY22/23 was discussed at NCT FR&A committee in August ‘23 where the Chief Internal Auditor concluded that they could give satisfactory assurance that a sound system of internal control was in place at the Trust. The FR&A committee agreed they would accept the audit opinion once they received further assurances on the opinion given. The FRA subsequently met again in September ’23 and received an update and further assurances on the position from the incoming Interim Chief Internal Auditor and the trust’s Director of Resources. Based on this update the FR&A committee are now satisfied with the professional opinion and assurance level given by the previous Chief Internal Auditor for the financial year 22/23.

Internal audit has provided satisfactory assurance that there is a sound system of internal control, designed to meet the Trust’s objectives, and that controls are being applied consistently.

It is recognised that the level of audit coverage, including the number of risk-based audits specific to the Trust, is important for assurance purposes and steps are in place to further increase the number of audits delivered in 2023/24.

List of Audits

Progress of internal audit review of 2022/23 (as at September 2023)

Audit	Audit Status	Assurance Rating		
		Control Environment	Compliance	Org Impact
2021/22 – Plan; 2022/23 Assurance				

Audit	Audit Status	Assurance Rating		
		Control Environment	Compliance	Org Impact
Services - Foster Care and Special Guardianship Payments	Final Report	Good	Good	Minor
Services - Placement Contract Management	Final Report	Satisfactory	Satisfactory	Moderate
WNC - IT Systems Security - Carefirst System	Final Report	Limited	Satisfactory	Moderate
Key Financials - Payroll	Final Report	Good	Substantial	Minor
WNC - Services - Social Care Transport	Final Report	Satisfactory	Limited	Major
2022/23 – Plan and Assurance				
Overarching Safeguarding Arrangements	Final Report	Good	Good	Minor
Corporate Parenting - Leaving Care s24	Final Report	Satisfactory	Satisfactory	Minor
Corporate Governance Framework (incl Ofsted Improvement Plan Monitoring)	Draft Report	Good	Good	Minor
Social Work Workforce	Final Report	N/A – Briefing Note Report - no ratings issued.		
Fostering Service (In-house Independent Fostering Agency)	Draft Report	N/A – Interim Report issued – no ratings issued further work planned for 2023/24.		
Sustainability – corporate parent role		Removed		
MTFP and budget management		Removed		
ICT – network infrastructure security		Removed		
ICT – privileged access control		Removed		
WNC Service Audits				
IT Disaster recovery	Complete	Limited	Limited	Moderate
IT Cyber security	Complete	Limited	Limited	Major
Payroll Transaction Testing	Complete	Good	Good	Minor

11.2 Self Evaluation

The self-evaluation for 2022 was reviewed by the ADCS regional improvement and innovation alliance in summer 2022, by Ofsted during the full ILACS in October 2022 and the social care annual conversation in 2023. A refresh of the annual self-evaluation will be completed for October 2023.

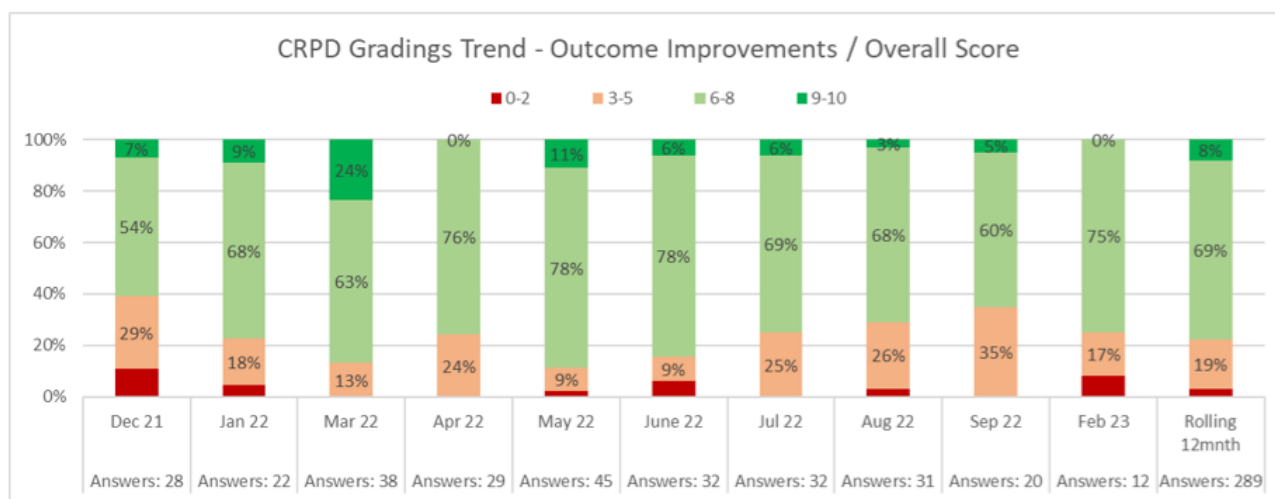


Full SEF ILACS 2022
final.pdf

11.3 Quality assurance of our practice with children and families

As part of our quality assurance framework, we undertake regular audits of children's cases. These are completed as a reflective discussion with the child's practitioner focused on the impact made for the child. These are known as 'collaborative reflective practice discussions' (CRPDs) and the results are reviewed at our monthly Quality Assurance Board, chaired by the Chief Executive. The graph below shows the overall experience of the child and impact of our work with them from our audited cases on a scale of 0 –10 (where 10 means the child is safe and happy, enjoys good health and wellbeing, and their outcomes show they are resilient and fulfilling their potential, and 0 means the child is not safe and healthy, has low resilience, and are not fulfilling their potential). 77% of CRPDs undertaken over 12 months up to the end of March 2023 were scaled at 6 and above out of ten for

overall outcomes. Other quality assurance activity undertaken by NCT includes thematic audits, Practice Weeks, practice observations and participation in peer and multi agency practice reviews.



11.4 Equalities surveys

NCT carried out its annual Equalities Survey in September 2022 to gauge the response of our workforce to new measures introduced to support more equitable and inclusive approaches to working. Feedback is also sought from our Equalities Forum on a six-weekly basis. Results include:

- On a scale of 0-10, where 0 is unsupported and 10 is fully supported for diversity and inclusion needs, the average ranking for 7.54.
- 68% feel that equality, diversity and inclusion has become more of a priority since we became NCT.
- 37% of respondents identified as belonging to an underrepresented or disadvantaged group.
- 63% work directly with children, young people and families.
- 45% of respondents have a role which involves managing others.
- 51% say we're at Cultural Pre-Competence and 34% say we're at Cultural Competence on the Cultural Competency scale.

11.5 Leadership Development Programme

All line managers in NCT have participated in the 9 month NCT Leadership Development programme in 2021/22. Review sessions have taken place in 2022/23 to reflect on the journey of the child through our system, our practice models and processes and leadership styles. NCT has also supported 30 colleagues to participate in nationally funded Pathways programmes for social care leadership, and 5 colleagues to participate in the Staff College's Black and Asian Leadership Initiative and Women in Leadership programmes.

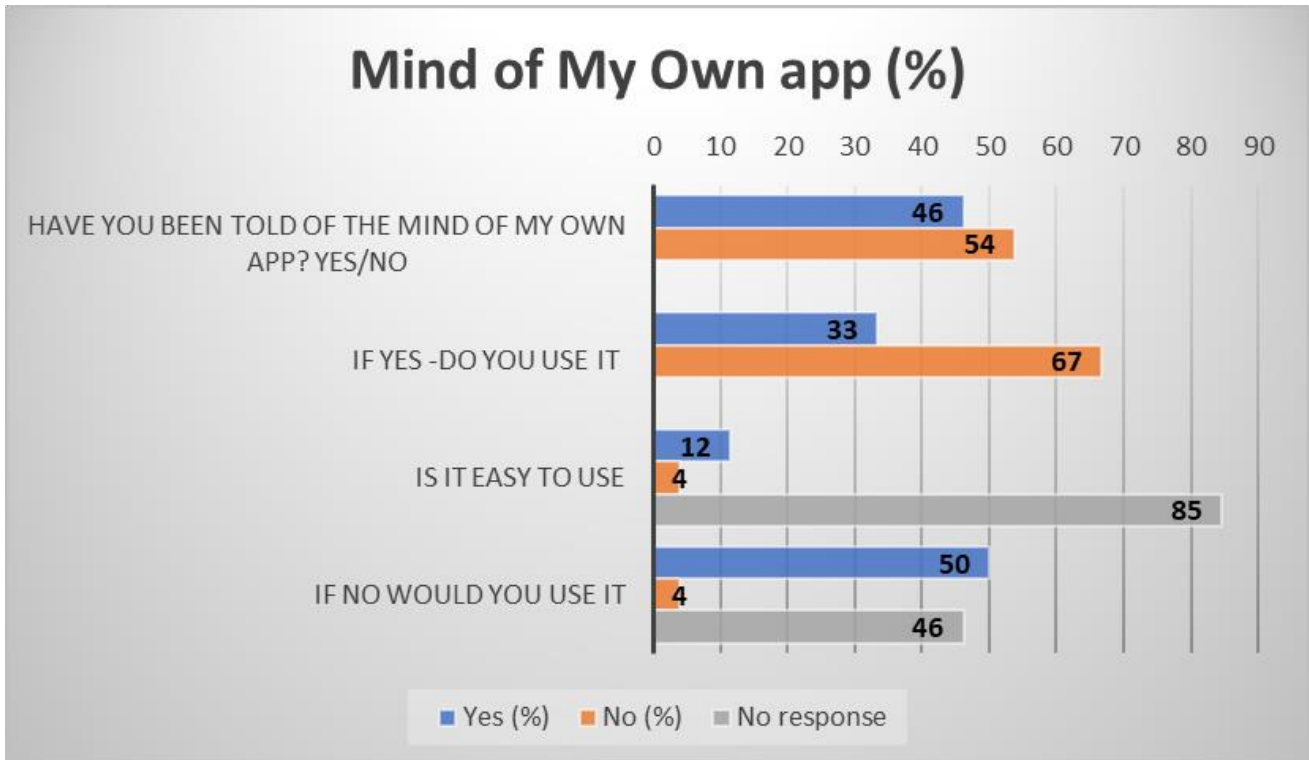
11.6 Surveys of children and young people

Children in care reviews

IROs have made effective use of a range of approaches to engage with young people, using various IT platforms. During the reporting period Apr 2022 to Mar 2023 there was a 15% increase to 54% of children and young people attending their review compared to the previous year. Overall, 82% of children and young people were able to either attend or share their views with the IRO prior to, or at their review enabling the young person's voice to be more clearly heard and giving them the opportunity to actively partake in the decision-making about their life. All IROs have a one-page profile and children and young people have fed back that they find these profiles beneficial as they help to make the first meeting more informal. IROs update and send their one-page profiles to children and young people prior to their first review and new IROs are required to complete their profile upon appointment.

Mind of My Own

26 young people responded to our survey on Care Plans in May 2022. The following chart shows their views on the Mind of My Own app.



Usage of the MoMO app declined in the early half of 2023. A working group has been established to relaunch the app, and an increase in usage – particularly by children – is being seen. Some of the promotional activities have included promotional leaflets and flyers distributed at the Children in Care awards, promotion by the Participation team and a new ‘train the trainer’ scheme to encourage use among colleagues.

Young people receiving support from Youth Offending Service

During 22/23, 81 young people provided their views in a questionnaire, a 17% increase on the previous year. Case workers received an average score of 9.22 on a scale from 1-10 – up from 9.1 the previous year. 93% said they found their case worker ‘very supportive’, and 91% said their case manager ‘totally’ did what they said they would – up from 76% last year.

The gender breakdown of the feedback was 84% male respondents and 16% female respondents. The ethnicity breakdown was 1.3% Asian, 5.1% Black, 10.3% mixed ethnicity and 83.3% white respondents.

11.6 External and peer reviews

The following reviews were undertaken in 2022/23:

- YOS Peer Review
- Exploitation thematic Peer Review
- Peer Review of NCT’s commissioning
- DfE Advisor review of assurance arrangements between the NCT, WNC and NNC
- DfE Advisor review of NCT’s quality assurance and performance management
- LGA review of Corporate Parenting
- LGA second Insight report into Northamptonshire Children’s Trust arrangements

The findings and recommendations of these reviews will need to be considered. NCT will provide a realignment report to inform the Contract Sum discussions in 2023/24. The report will set out what will be required to support services on West and North locality basis, to support two inspections and to deliver good quality children's services.

11.7 Significant Complaints, Child Safeguarding Practice Reviews (CSPRS) and Serious Incidents

No complaints were received during 22/23 that met the significant complaints threshold. 7 serious incidents occurred in 2022/ 23 and reported to the national panel. One CSPR was published between 01.04.22-31.03.23: Ref102 Child Ba, published 8 March 2023.

[Child Ba - Child Safeguarding Practice Review - Northamptonshire Safeguarding Children Board \(northamptonshirescb.org.uk\)](http://northamptonshirescb.org.uk)

12. The outcomes of any Rectification Plans

As per Schedule 6 (Performance Framework) of the Service Delivery Contract, NCT must produce a Rectification Plan where Performance Failure has not been resolved at the Formal Stage of the Escalation process. There were no Rectification Plans requested during the 2022-23 contract year.

13. High level review of general funding available for Councils

NCT received grant funding of £14,076,000 in 2022/23. Grant funding is generally paid to the Councils and is passported to NCT as contract income and contract variation income.

North Northamptonshire was awarded £4m Family Hub programme funding for 2022-25.

14. Risk register

The NCT Risk register risks are categorised in 3 categories, each of which a Director is responsible for, Corporate, Social Care and Finance and Operations. The Register is updated quarterly by risk owners, and then a covering report highlighting key changes and issues for discussion, along with the register is reviewed at PPQ Committee and NCT Board.



NCT Strategic Risk Register - April 2023

15. The outcome of any regulatory inspections

Ofsted Visits of Children's Social Care April 22 – March 23

Inspection of Local Authority Children's Services, October 2022

North Northamptonshire [50200024 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/inspections/50200024)

West Northamptonshire [50200026 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/inspections/50200026)

Judgment: *Requires Improvement to be Good*

A full inspection of Children's Social Care took place during 3rd-14th October 2022. The impact of leaders on social work practice with children and families, the experiences and progress of children who need help and protection and the experiences and progress of children in care and care leavers were all graded as Requires Improvement to be Good resulting in the overall effectiveness for both Councils being judged as Requires Improvement to be Good, this was a welcomed improvement from the previous grading in 2019 of Inadequate.

Ofsted saw significant improvements in our Children's Social Care Services over the last 2 years. Inspectors observed the significant shift in culture the Trust has made to one that is now of high support and kindness. As an organisation we put children and young people at the heart of all we do and again Ofsted noted. Ofsted also rightly found areas that we can improve on which is captured in our Improvement Plan, see Section 9.

Independent Fostering Agency Inspection – February 2023

[50211704 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/inspections/50211704)

Judgement: Inadequate

On becoming a Trust, we had to register our fostering service as an independent fostering agency (IFA). Our IFA had its first inspection in October 2021 with the outcome Requires Improvement to be Good. [50174779 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/inspections/50174779)

The second Inspection took place 6-10 February 2023 with the outcome of Inadequate. While this wasn't the outcome we anticipated, we fully accepted the findings and recommendations of the report.

A service improvement plan is in place with agreed team objectives, targets, and timescales for completion. We have worked with our foster carers, children, young people and partners to develop this plan to improve the service so that it is the best it can be to meet the needs of our children and young people.

Children's Home Inspections

Home	Last Full inspection date	Grading	Monitoring visit	Comments
Thornton House URN 2608872	11th January 2023	<i>Requires improvement to be good</i>	<i>Improved effectiveness</i>	<i>Opened Jan 2020</i> <i>Interim inspection</i> 9 March 2022
Phoenix House URN 2608892	7th February 2023	<i>Good</i>	20th-21st October 2020	<i>Opened Feb 2020</i>
Welford House URN 2608968	30 April 2019 October 2021 15th November 2022	<i>Good</i> <i>Good</i> <i>Good</i>	24 Feb 2021	<i>Interim Inspection</i> 4 March 2020
Raven House URN 2615067	April 2019 July 2021 11-12 Aug 2021 9th August 2022	<i>Good</i> <i>Good</i> <i>Good</i> <i>Good</i>	22-23 Sep 2020 - 12 Nov 2020 -	<i>The assurance visit resulted in a restriction notice from 28 September which was lifted 20 Dec 2020.</i>
Arnold House URN 2616670	2-3rd July 2019 17 -18 May 2022	<i>Requires improvement to be good</i> <i>Good</i>	17 June 20 22 July 20 13-14 October 20 26 Jan 21 Jun 21 Nov 29th, 2022	<i>N/A</i>

16. Any proposed changes to the SDC

The following will be considered as part of the annual review in 2023/24:

- Development of contract sum 2024/25
- Review of assurance procedures and KPIs to be undertaken between NCT, NNC and WNC during annual review period
- Review of SLAs within the Support Services Agreement, including:
 - re-costing by the Councils as the current SLAs are based on an uplift on the original costs identified prior to the inception of NCT
 - a service level agreement for the supply of transport following disaggregation of the countywide transport support service

17.Strategic Direction

Looking ahead to 2023/24, NCT's primary focus continues to improving experiences and outcomes for children and families who need help; whether that is targeted early help, youth offending or statutory social care support. NCT wants children to be able to remain within the care of their families when this is safe and in the best interests of the child. When a child is not able to remain in the care of their families, NCT want children to receive good quality care that meets their needs. NCT wants all children to thrive and be able to live safe, be safe; fulfil their potential; develop resilience and enjoy good health and wellbeing.

Since the inception of NCT, children's services have improved from 'Inadequate' to 'Requires Improvement to be Good'. This has been achieved in the context of the establishment of NCT, WNC and NNC as new organisations; a global pandemic; a continued national shortage of social workers; a national crisis in children's placements market; cost of living and inflation increases and increasing demand and complexity of need (See Appendix 5). NCT's priority is to keep improving and go on to deliver good and outstanding services for children. NCT's Improvement Plan and Independent Fostering Agency's Improvement Plan will continue to guide progress, along with external scrutiny though Ofsted focused visits and inspections of children's homes and NCT's independent fostering agency in 2023/24.

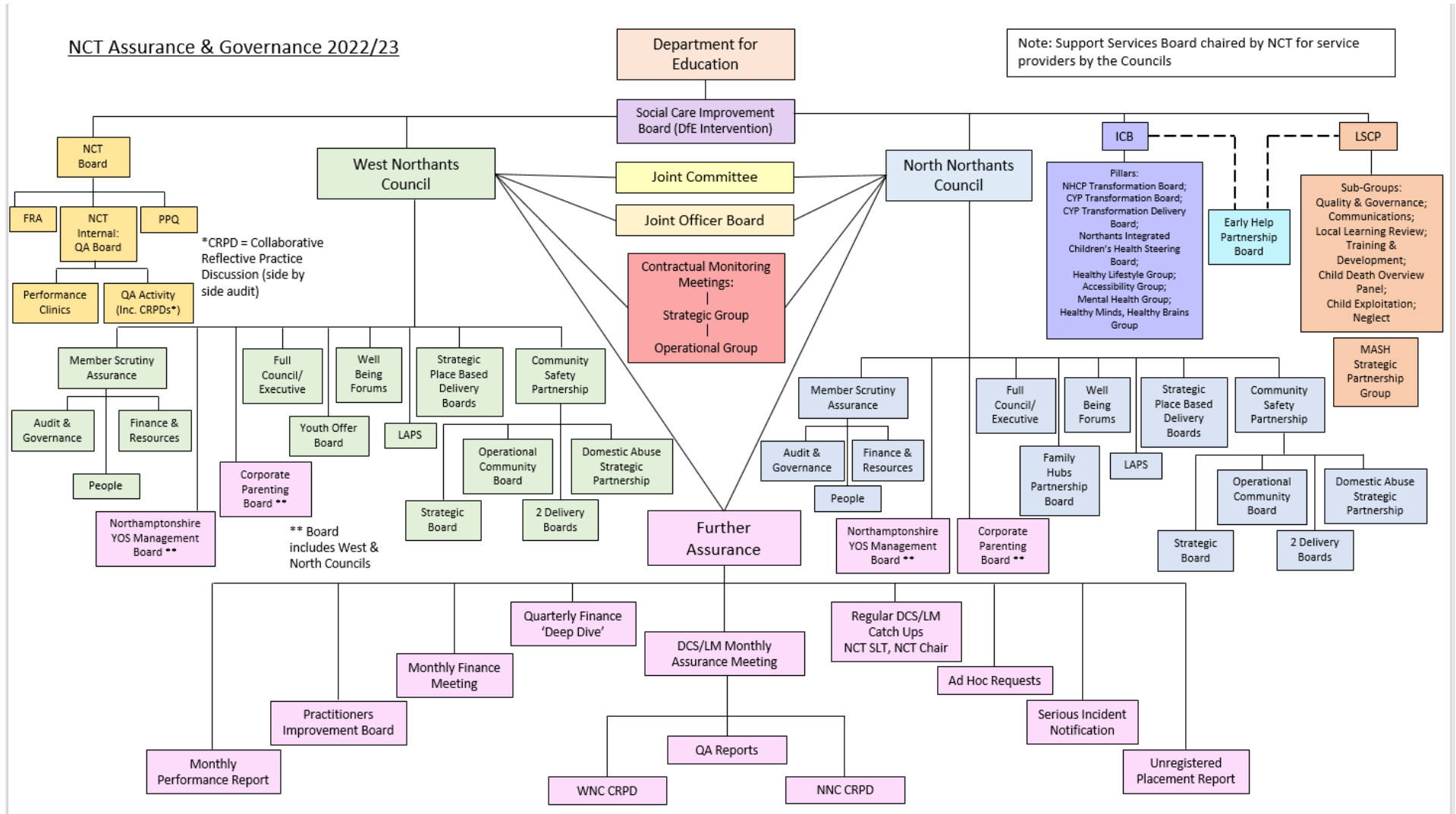
The most significant challenges for 2023/24 are likely to be managing demand, including reducing referrals to children's social care when families do not require a statutory intervention; and increasing costs of delivering services, including the cost of placements that can meet the needs of children. Key to addressing demand will be implementing changes to the 'front door' following a peer review to be completed in Q2 of 2023/24. Key to ensuring that children are cared for in placements that can best meet their needs and provide the best value for money is the continuation of the Circle to Success programme in 2023/24.

The financial challenges faced for children's services and the rest of the public sector are likely to increase during 2023/24. Whilst the government is proposing changes intended to improve the national workforce and placements situation, these will take some time to have impact. NCT, alongside the Councils and other statutory partners, will continue to seek to make the best use of resources and achieve value for money in the challenging national and local financial context. This includes delivering savings, managing budgets effectively and highlighting where budgets are out of step with demand.

The external reviews completed in 2022/23, particularly the DfE Advisor's review of assurance arrangements between the NCT, WNC and NNC; DfE Advisor's review of NCT's quality assurance and performance management and the LGA's second Insight report into Northamptonshire Children's Trust arrangements, have provided helpful reflection and recommendations for effective delivery of children's services in the Northamptonshire context. NCT will work with the Councils to agree and implement actions arising from these reviews.

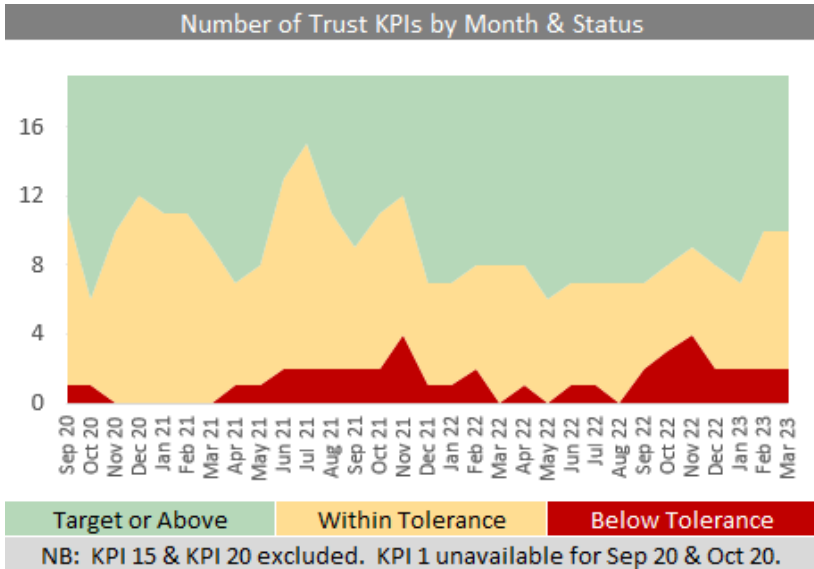
Above all else, NCT will continue to keep children, young people and families at the heart of all we do – in every action we take and every decision we make. NCT will live out the commitment our children asked us to make to them – *What we do today affects your tomorrow, we promise to walk side by side with you.*

Appendix 1 – NCT Assurance and Governance

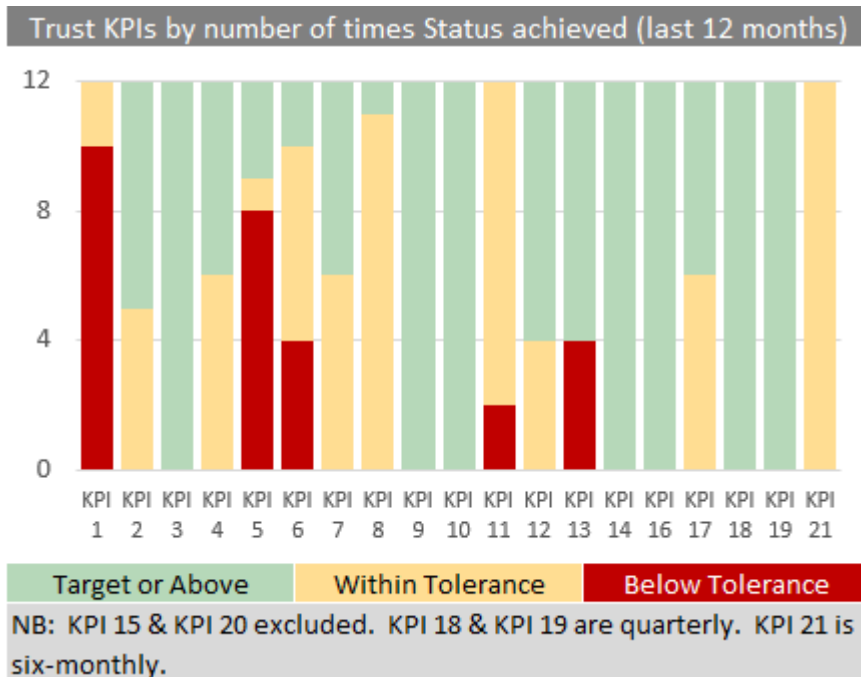


Appendix 2 – 2022/23 Performance against KPI’s

Overview of KPI Performance



May 2022 was the period where NCT delivered the best performance against the KPI’s where 13 KPIs were *At Target or Above*, 6 *Within Tolerance* and none *Below Tolerance*.

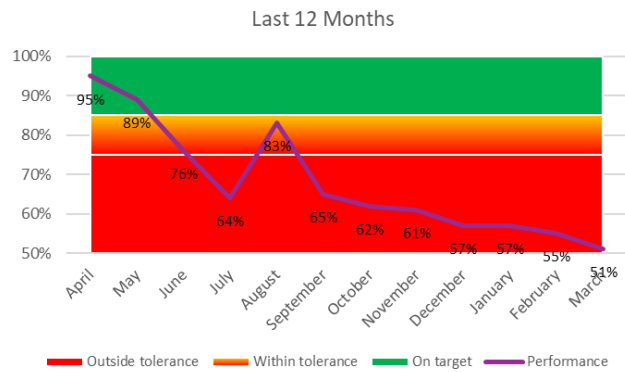
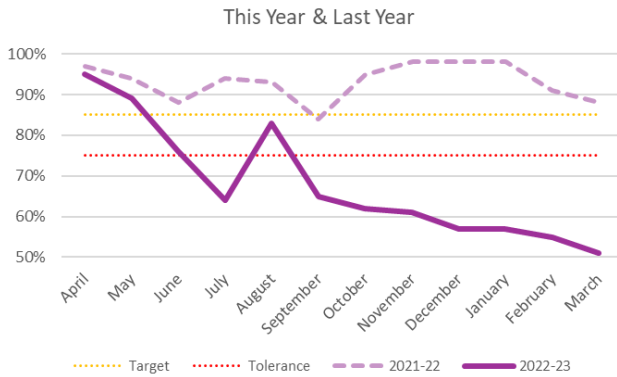


KPI’s 18, 19, 20 & 21 are reported quarterly or bi-annually.

Individual KPI Performance

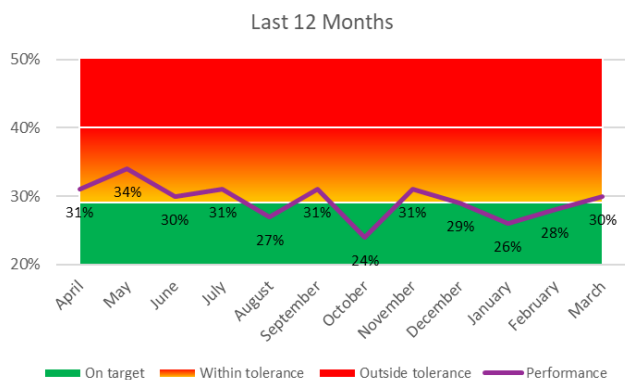
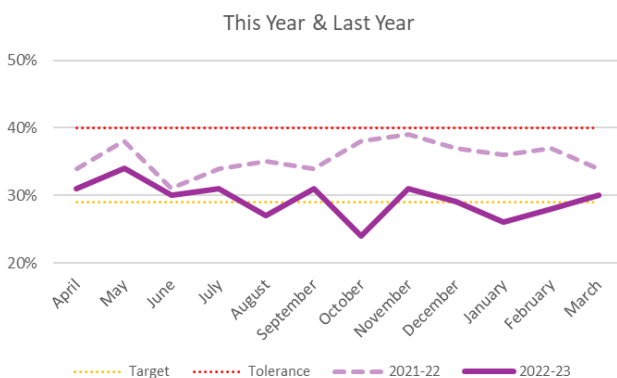
KPI 1 - % all referrals with a decision within 2 working days

2022/23 Overview

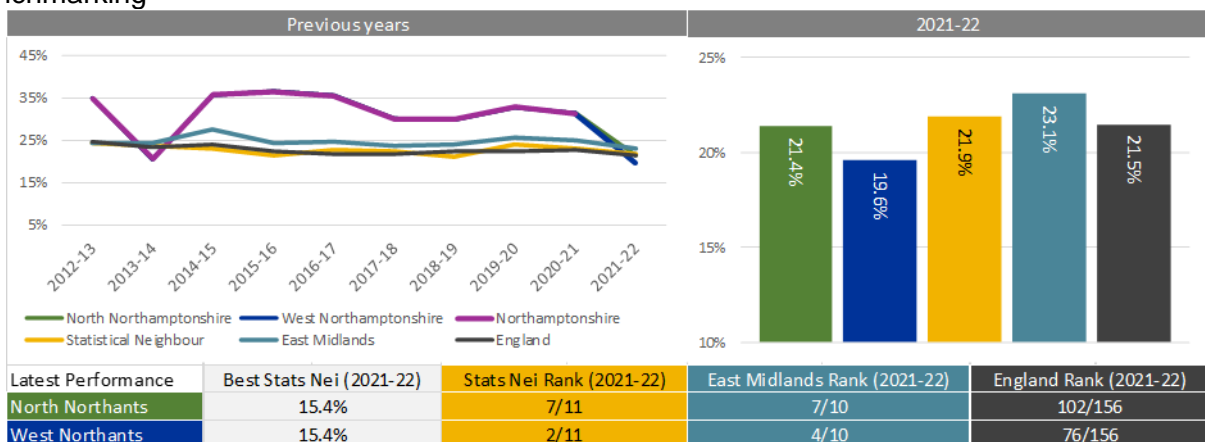


KPI 2 - % referrals with a previous referral within 12 months

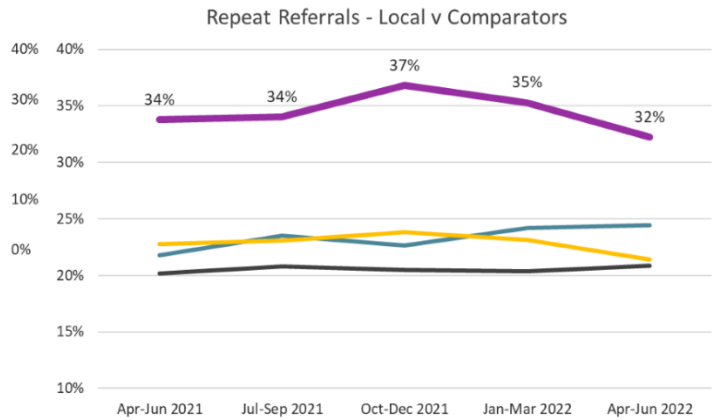
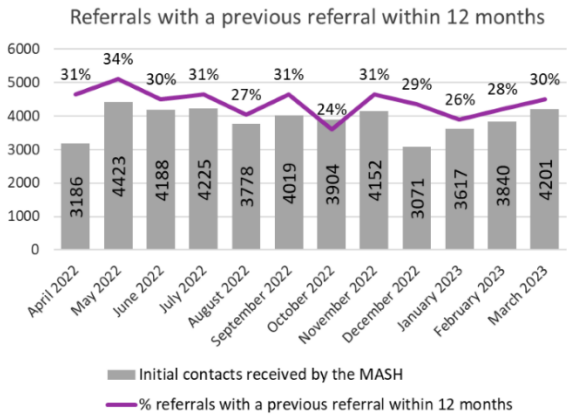
2022/23 Overview



Benchmarking

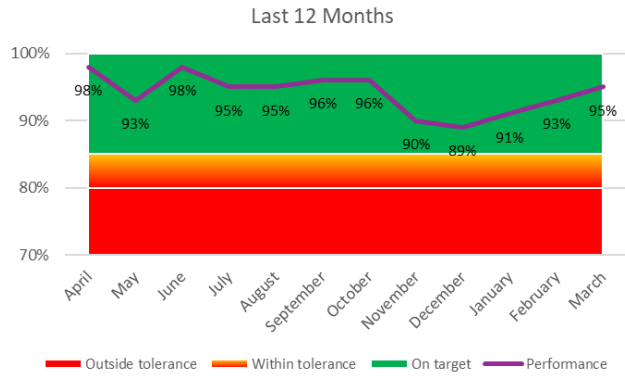
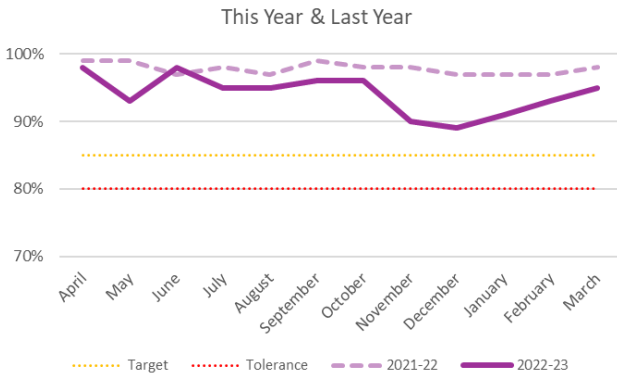


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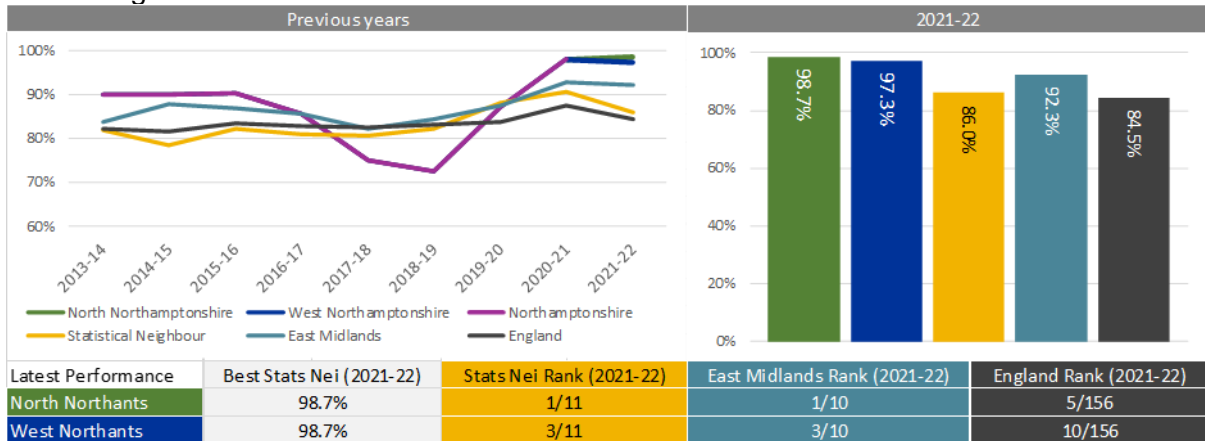


KPI 3 - % Single Assessments authorised within 45 working days

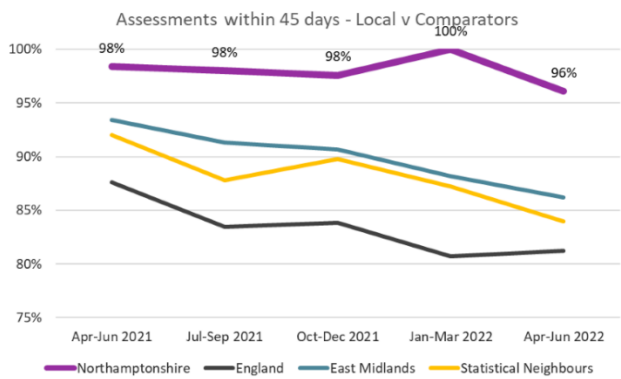
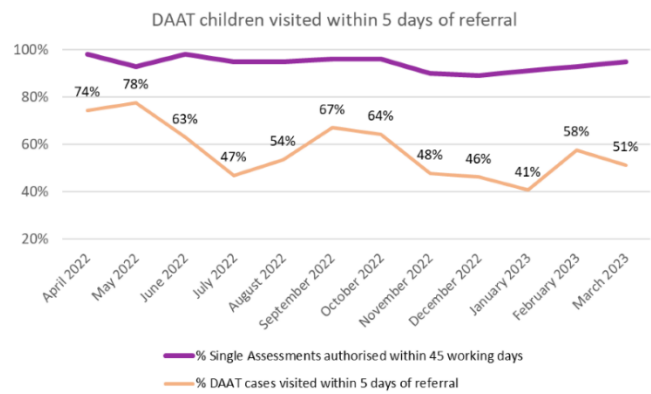
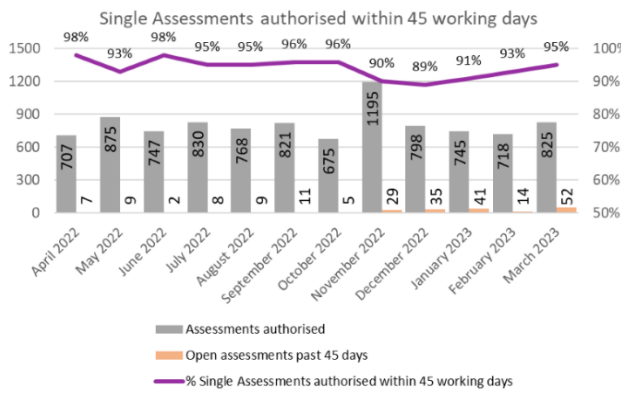
2022/23 Overview



Benchmarking

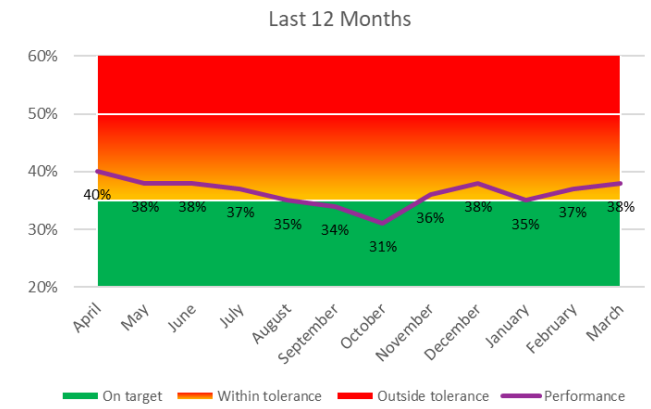
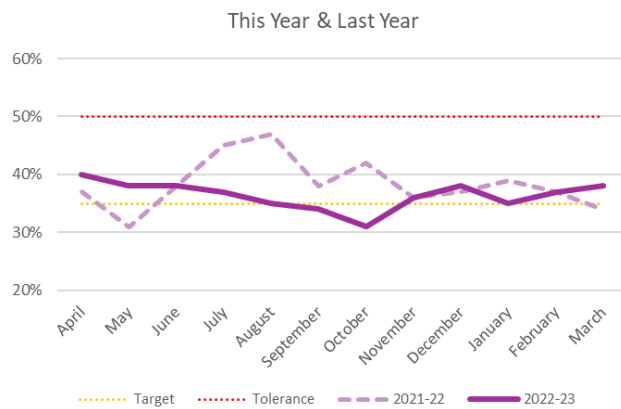


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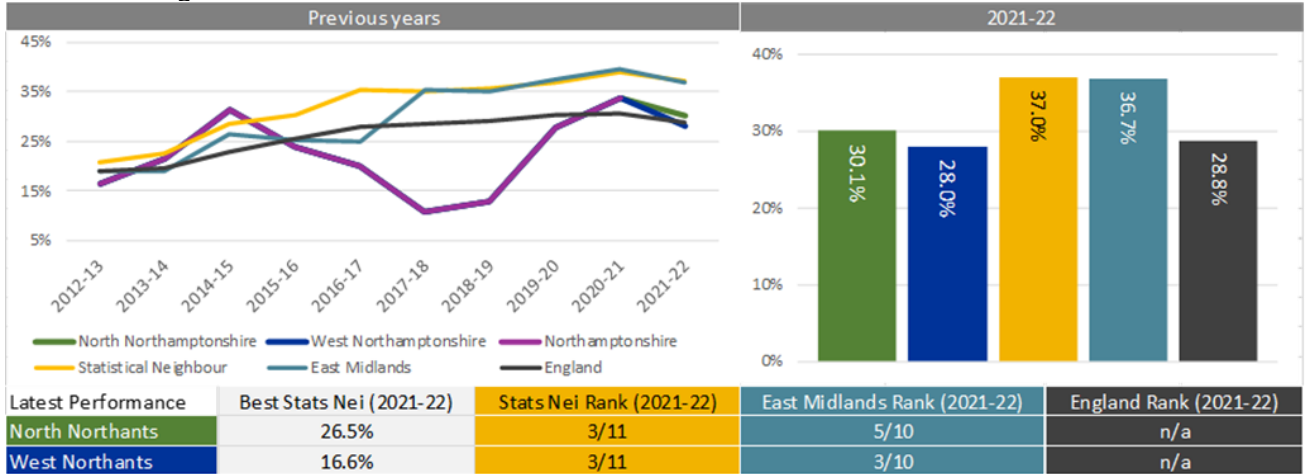


KPI 4 - % Single Assessments closing with no further action

2022/23 Overview

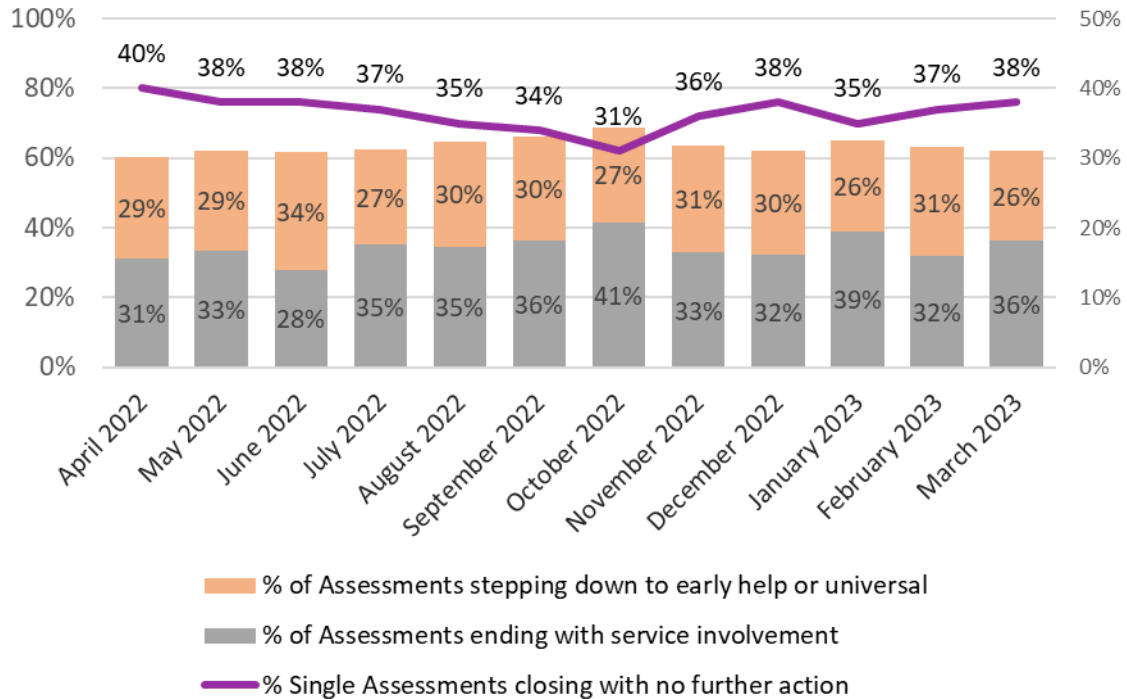


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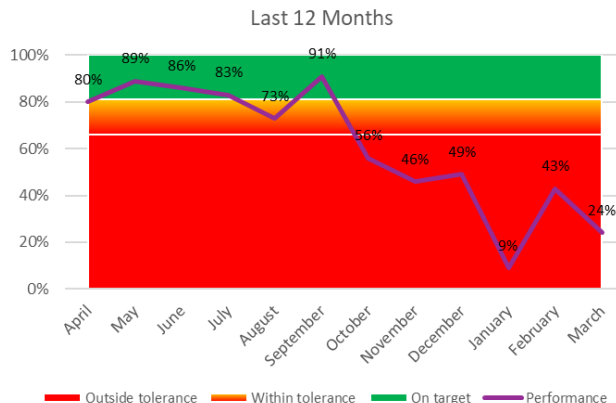
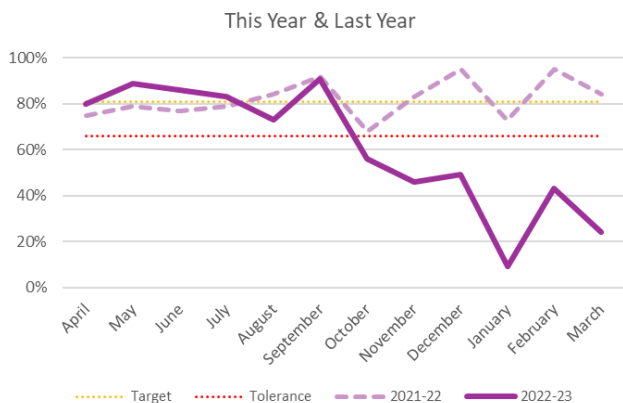
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Single Assessments closing with no further action

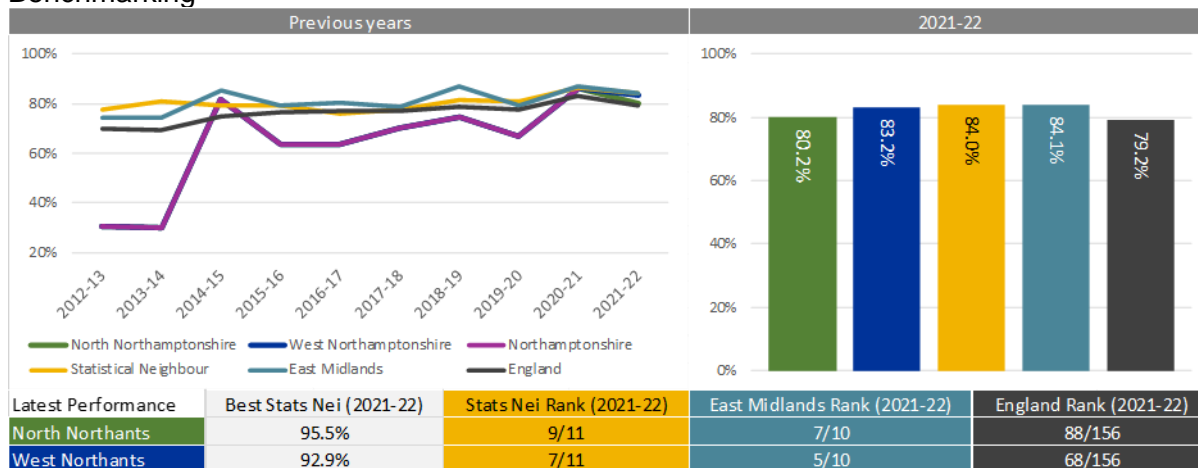


KPI 5 - % Initial Child Protection Conferences held within 15 days of a strategy discussion being initiated

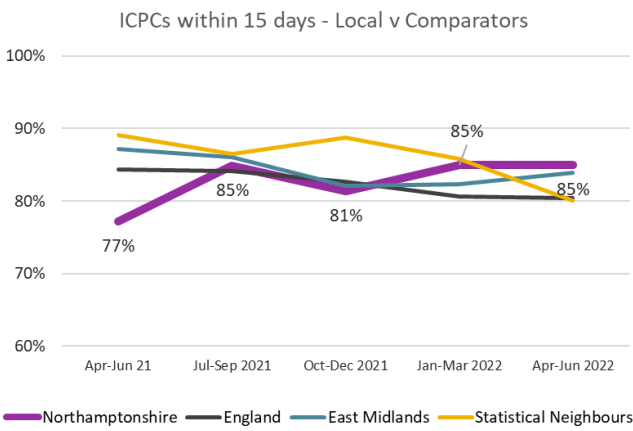
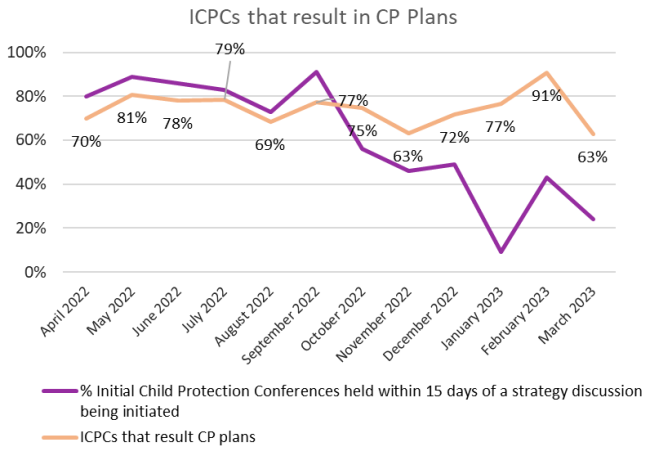
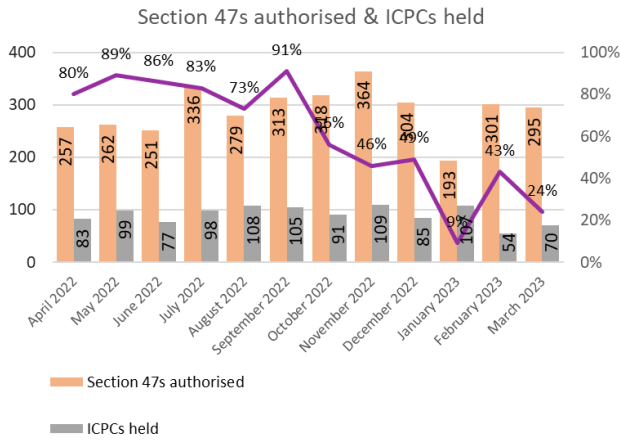
2022/23 Overview



Benchmarking

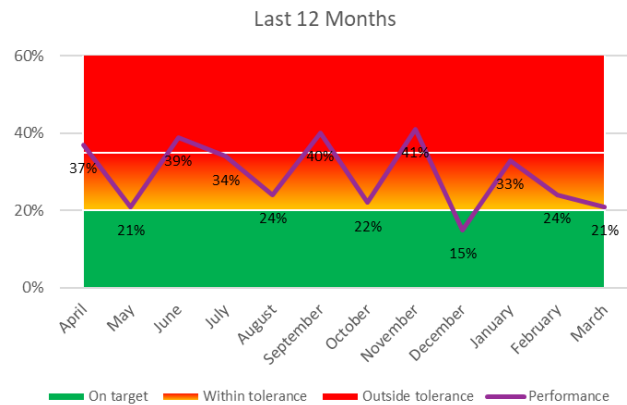
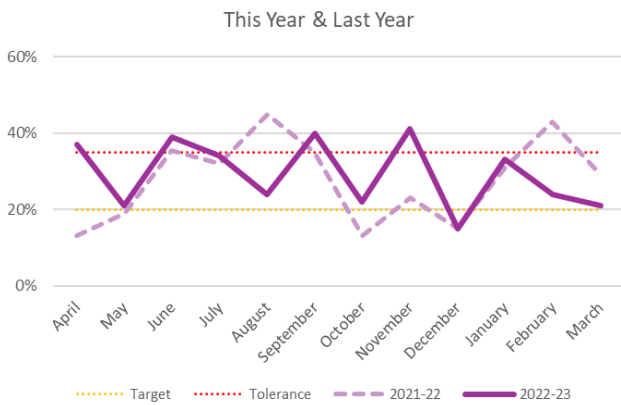


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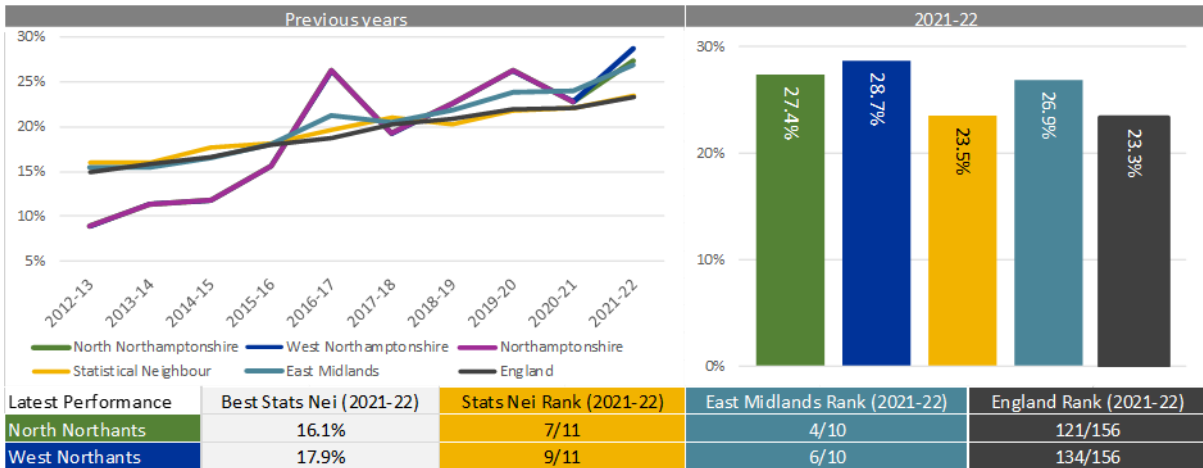


KPI 6 - % children that became the subject of a Child Protection Plan for the second or subsequent time

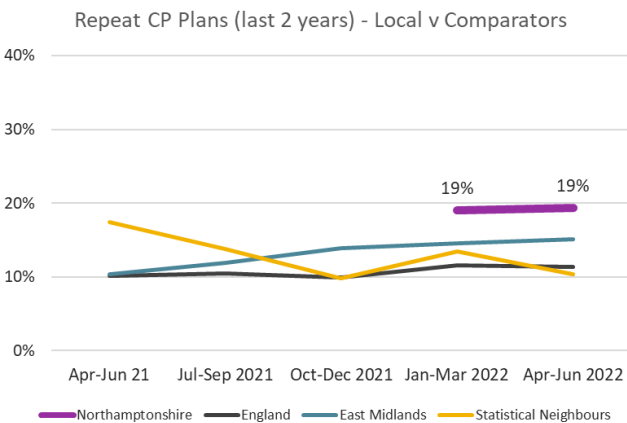
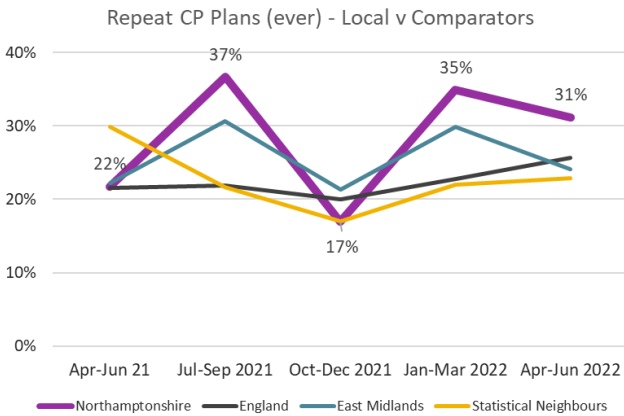
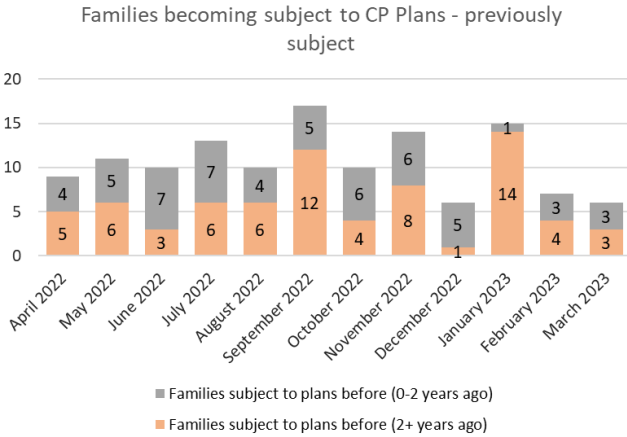
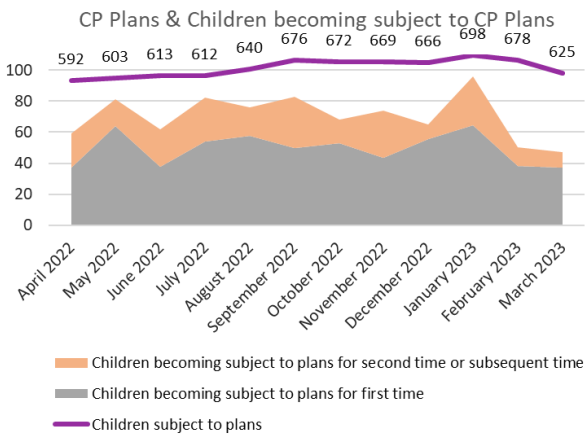
2022/23 Overview



Benchmarking

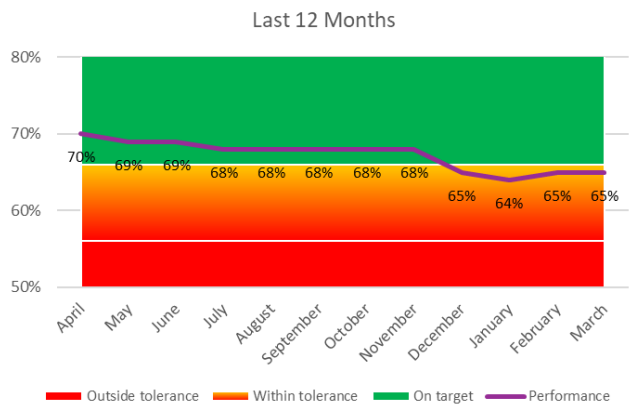
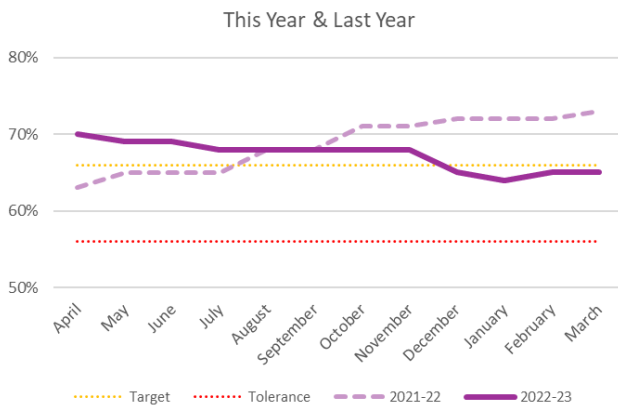


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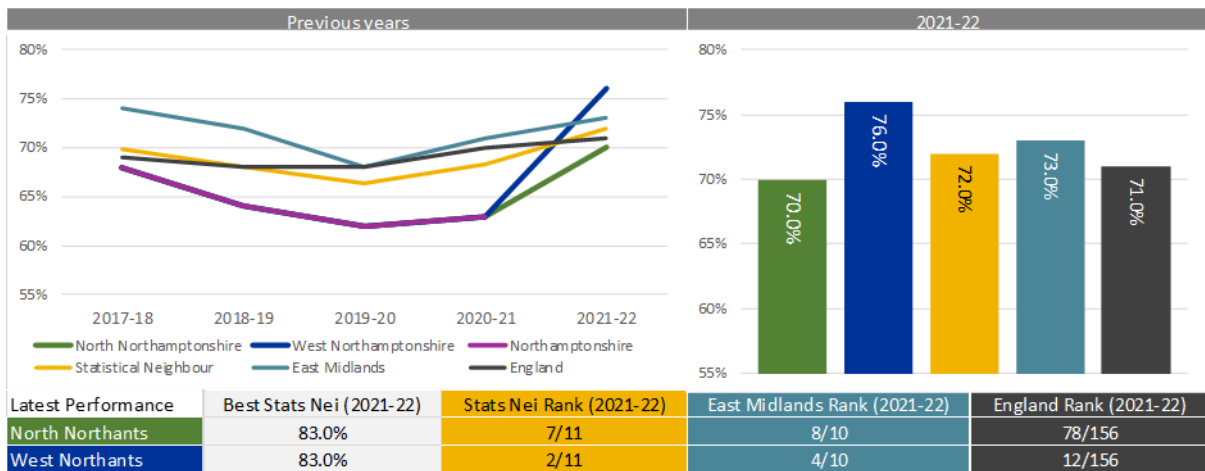


KPI 7 - % children in care 2.5 years or more who have been in the same placement for 2+ years/placed for adoption

2022/23 Overview

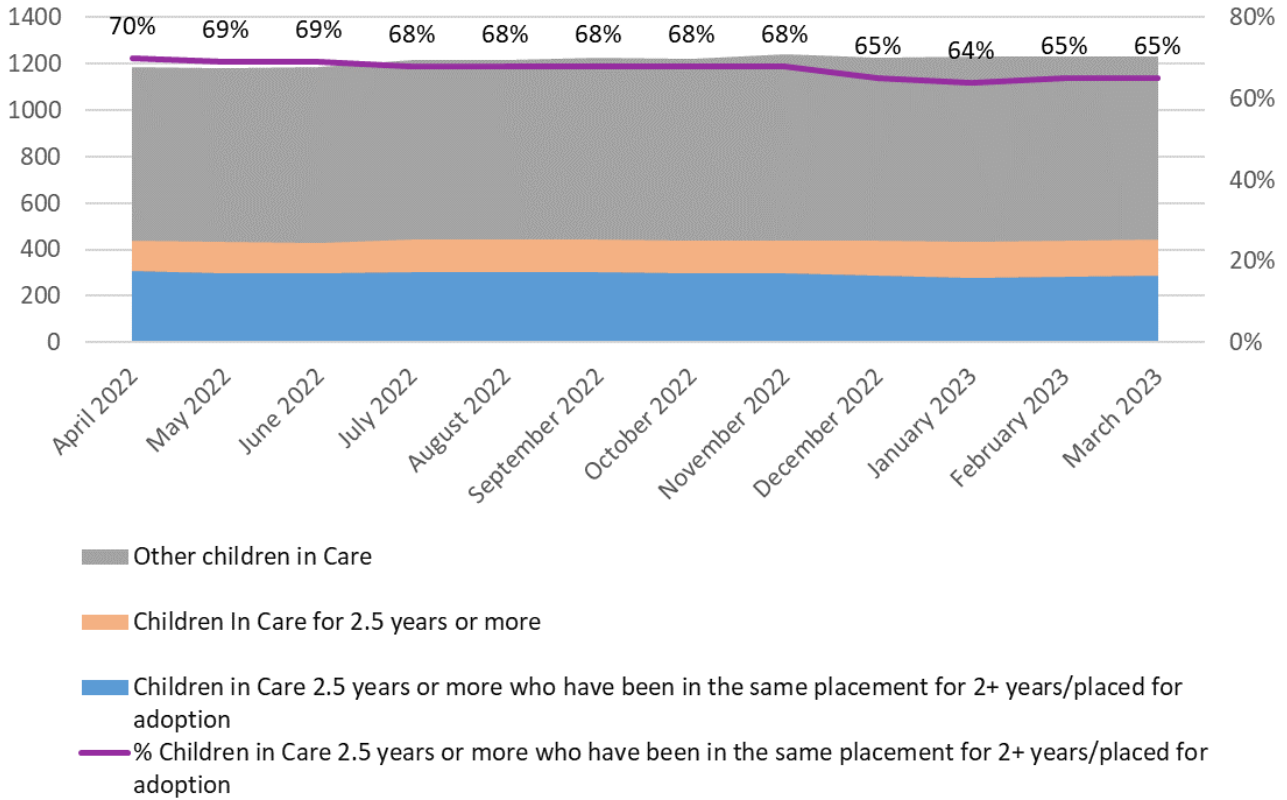


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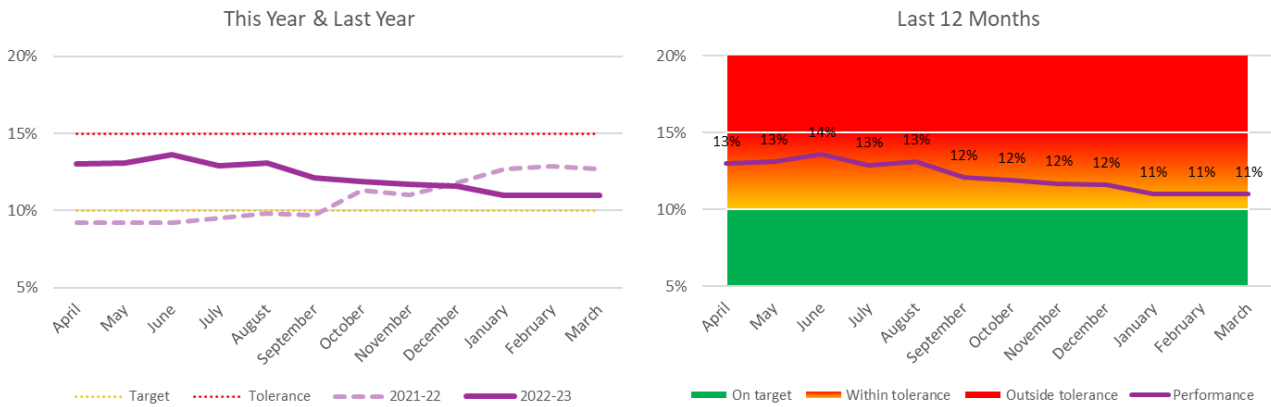
Contextual data

Children in Care for 2.5 years or more who have been in the same placement for 2+ years/placed for adoption

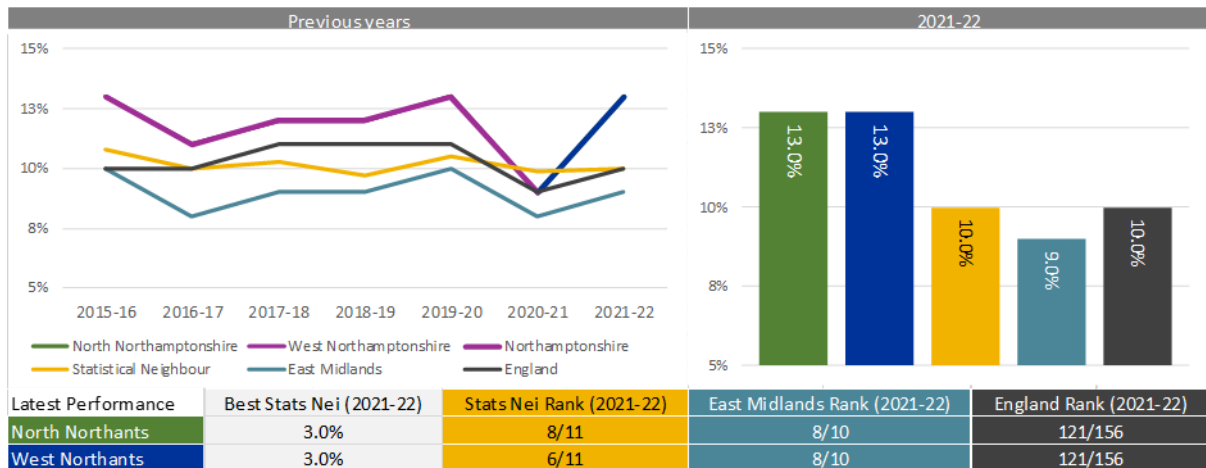


KPI 8 - % Children in Care with three or more placements in the previous 12 months

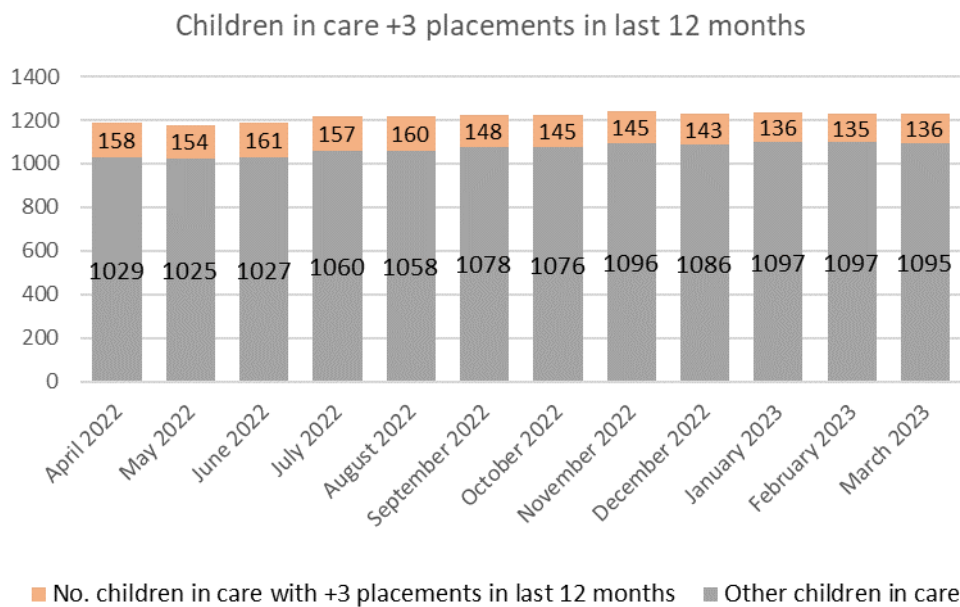
2022/23 Overview



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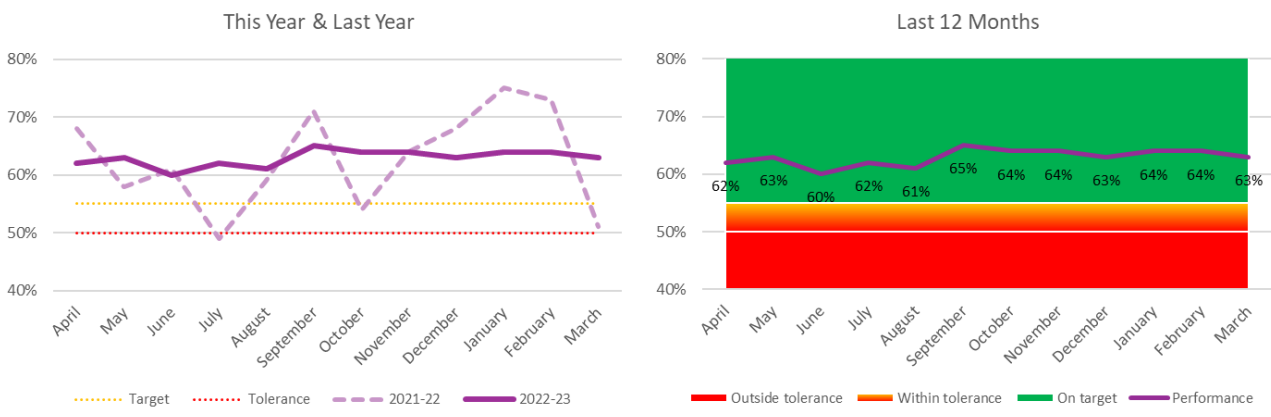


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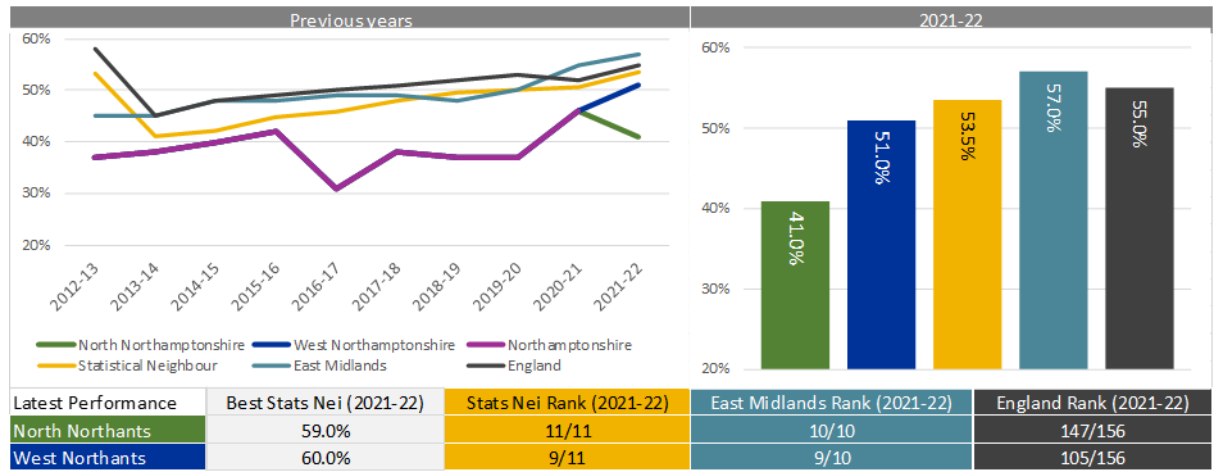


KPI 9 - % young people aged 17-21 in employment, education or training who were looked after when aged 16

2022/23 Overview

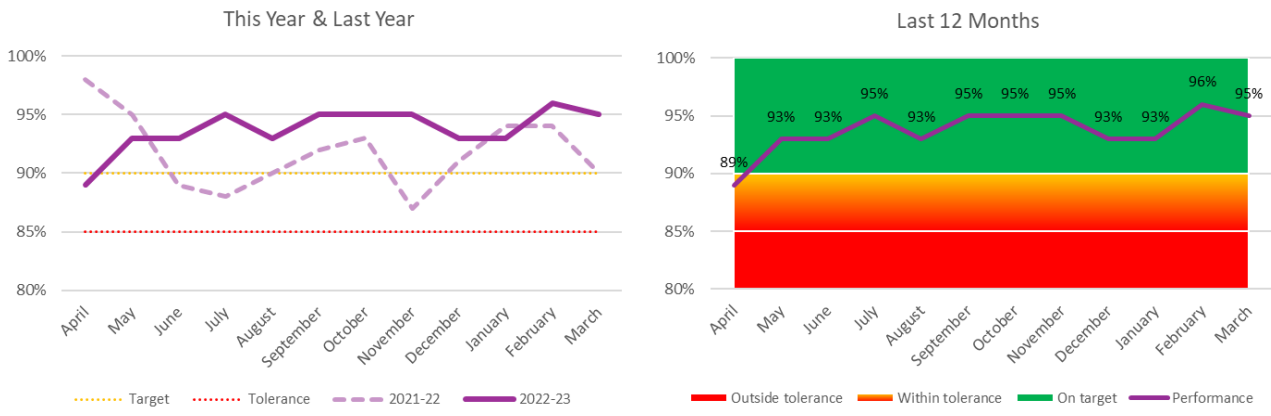


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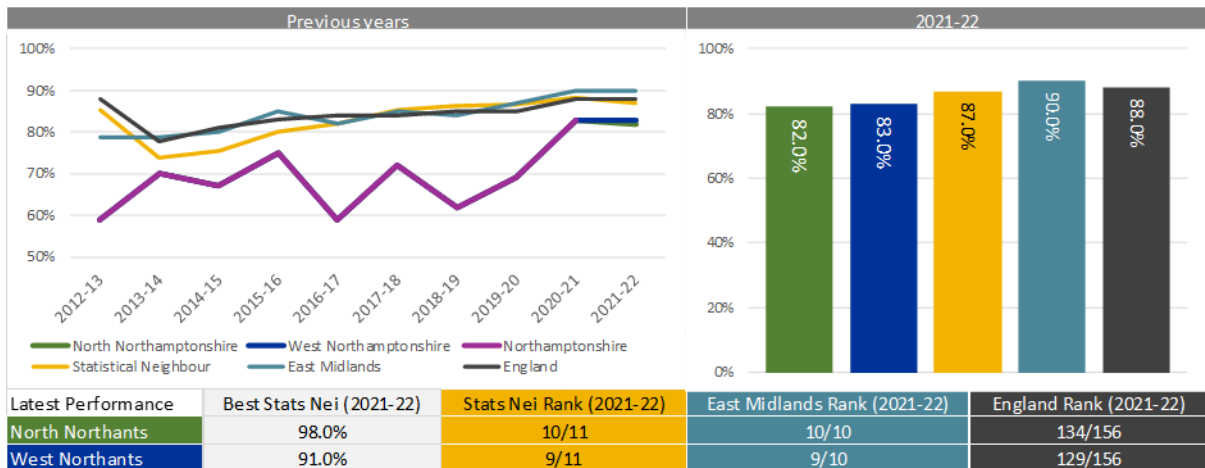


KPI 10 - % young people now aged 17-21 and living in suitable accommodation who were looked after when aged 16

2022/23 Overview

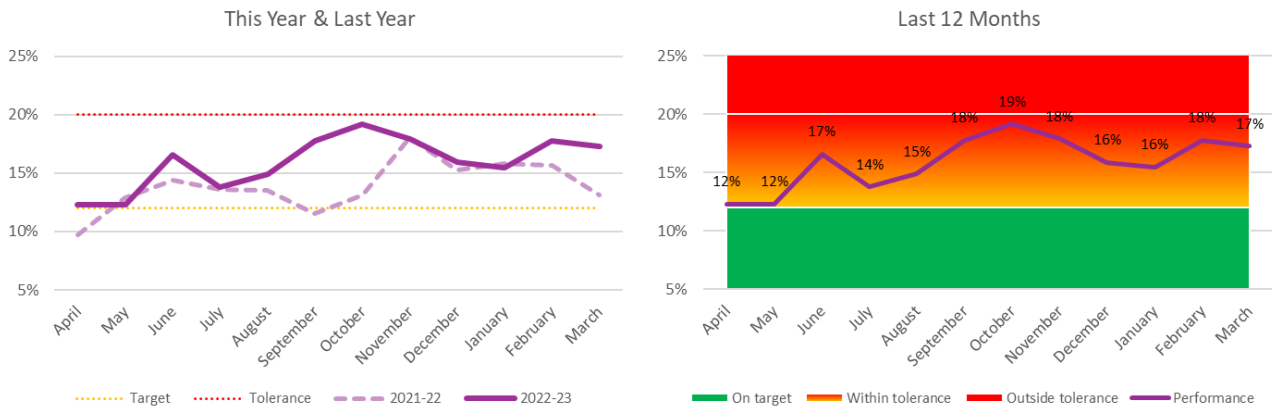


Benchmarking



KPI 11 - % qualified social workers with caseloads above target

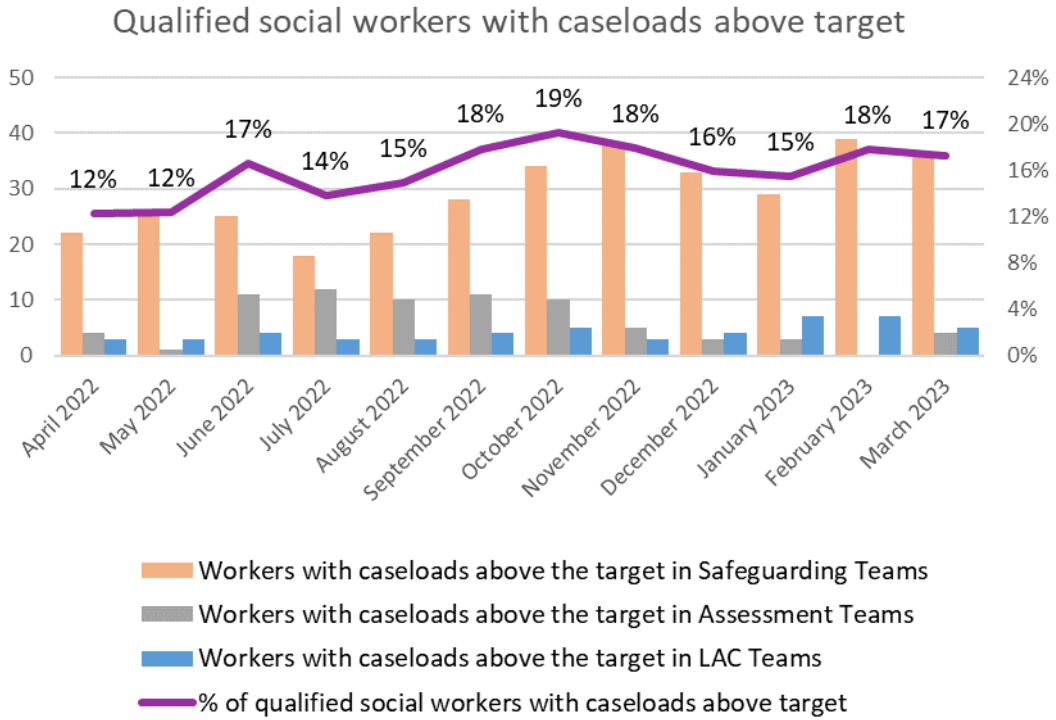
2022/23 Overview



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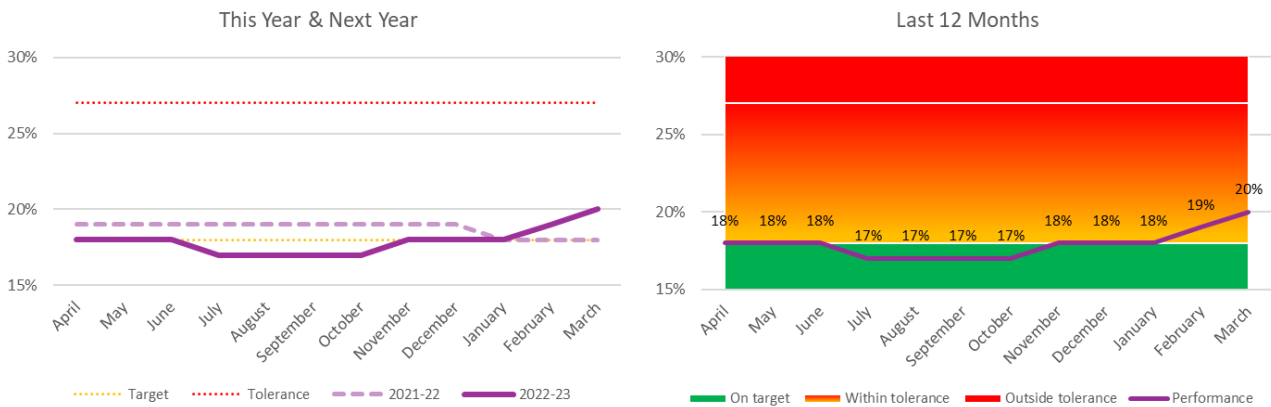


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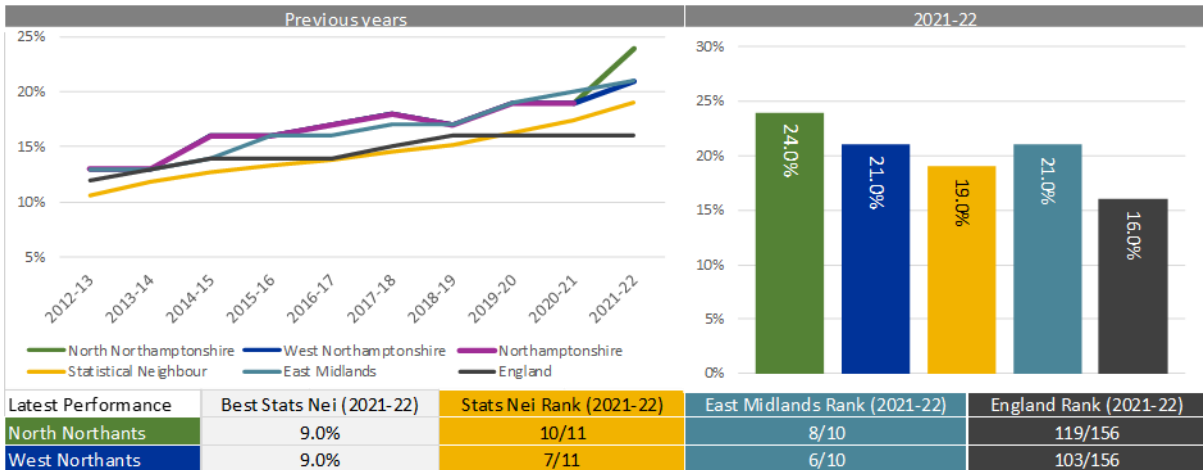


KPI 12 - % of children placed more than 20 miles from their homes, outside LA boundary

2022/23 Overview

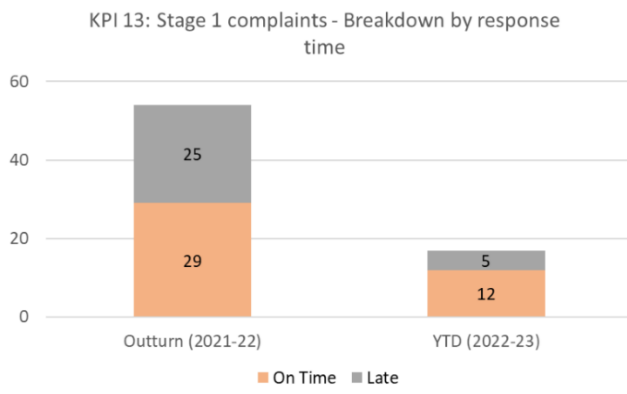
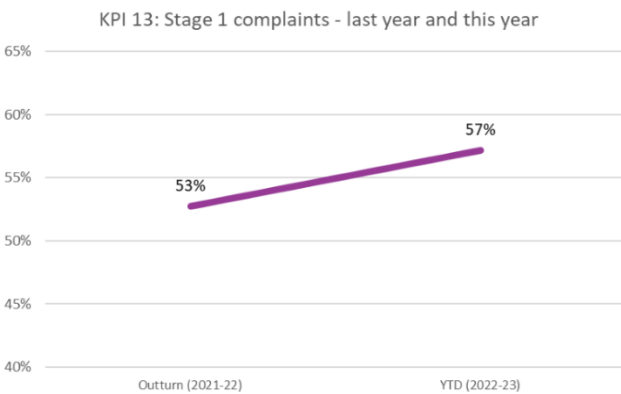
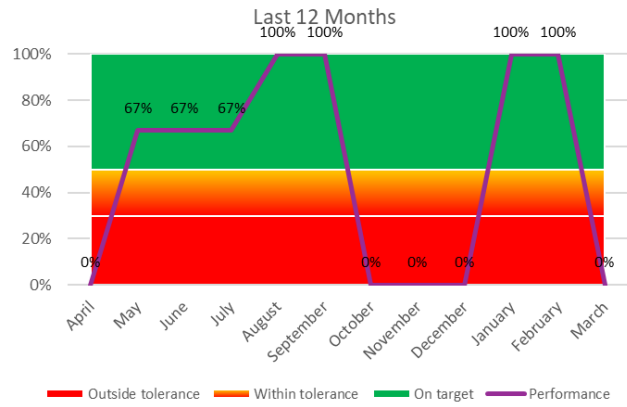
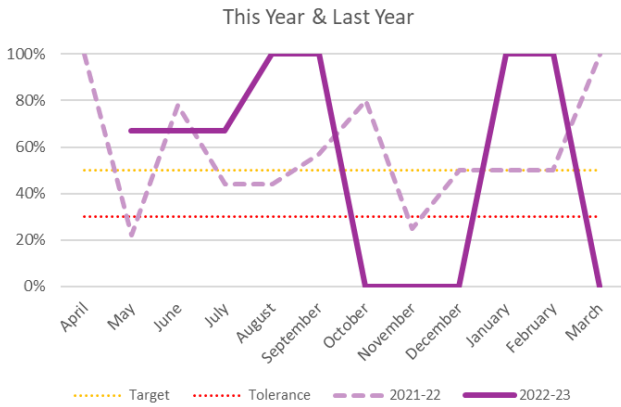


Benchmarking

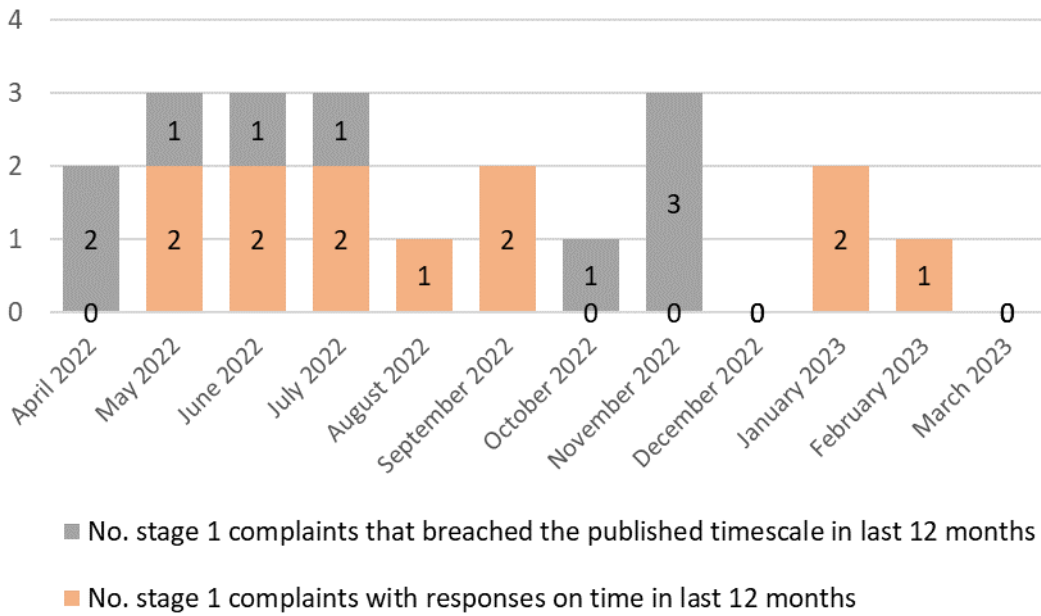


KPI 13 - % stage 1 complaints responded to within 10 working days

2022/23 Overview

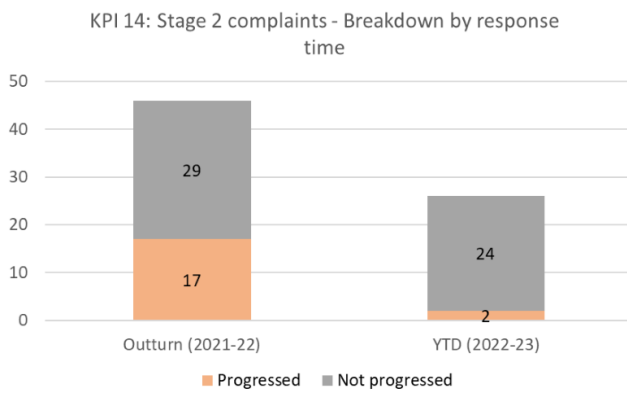
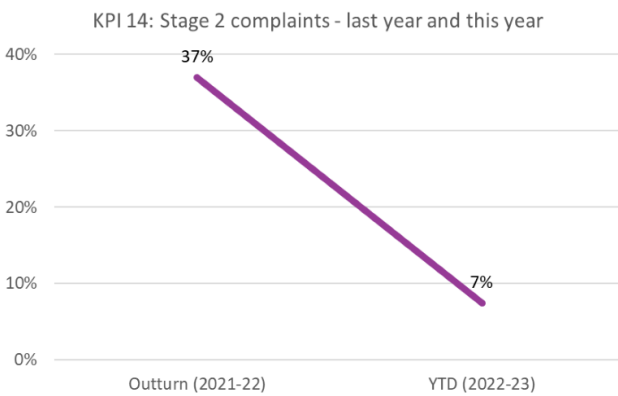
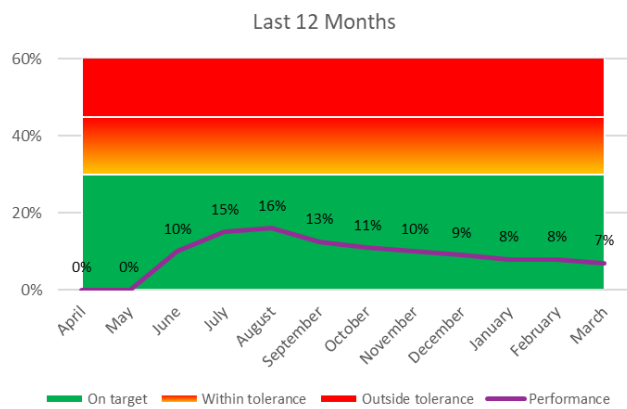
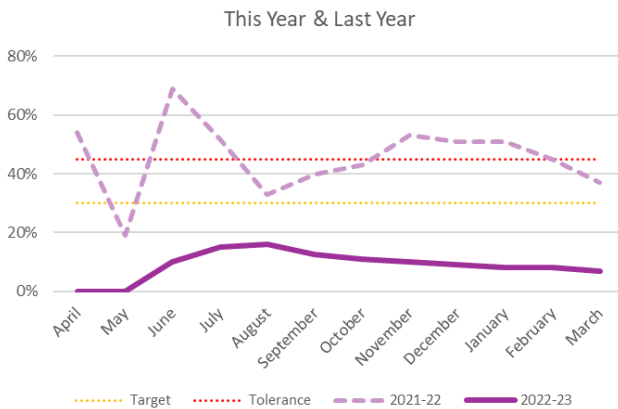


Stage 1 complaints in the last 12 months



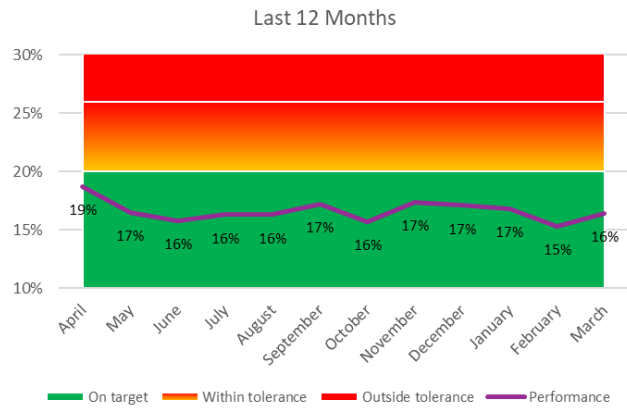
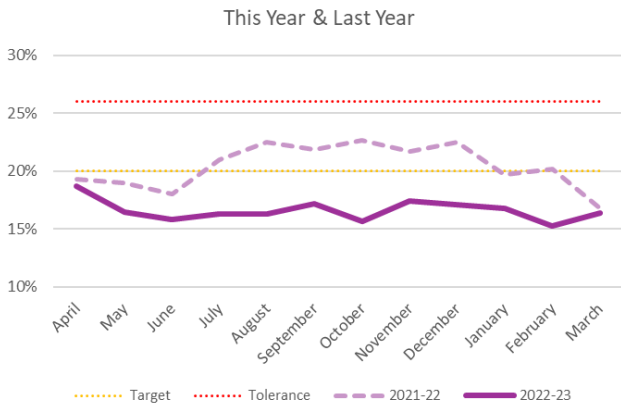
KPI 14 - Stage 2 investigations as a % of stage 1 complaints received within the year

2022/23 Overview

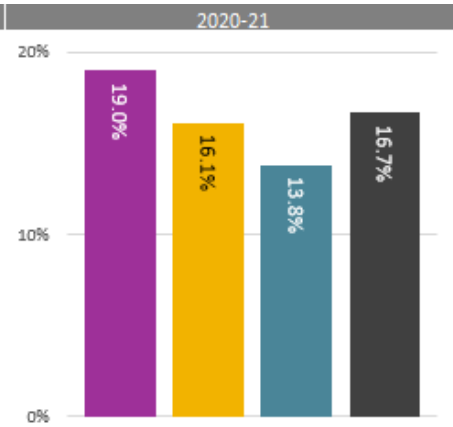
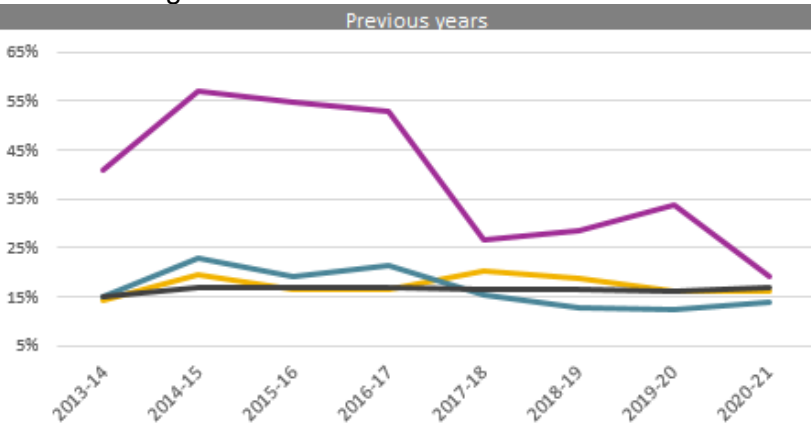


KPI 16 - % social worker vacancies

2022/23 Overview

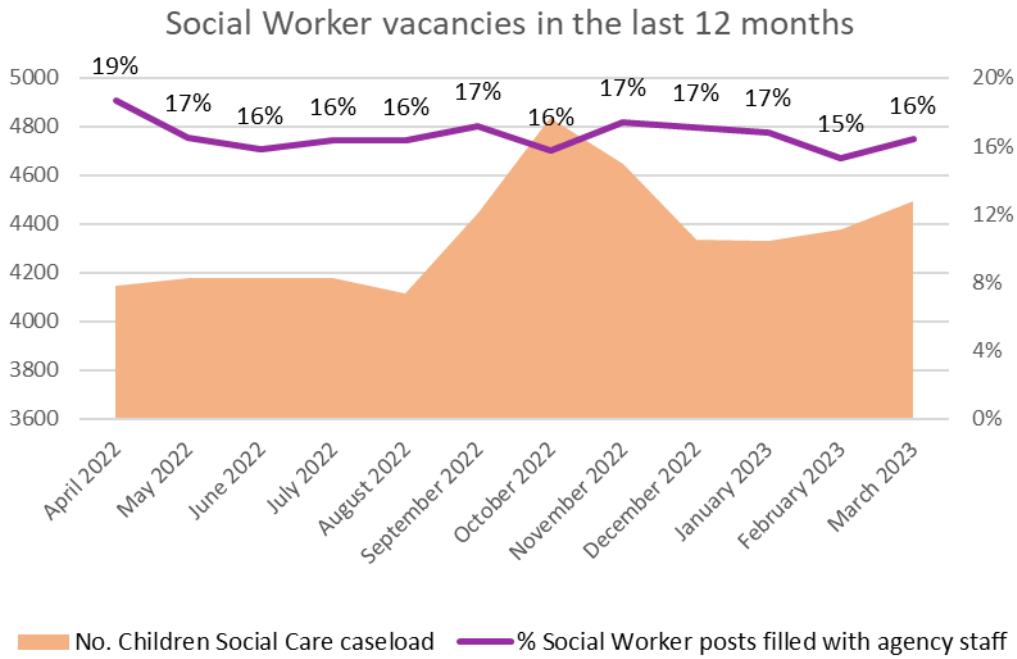


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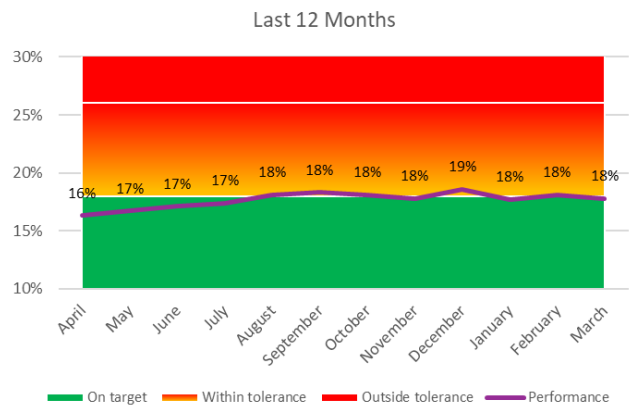
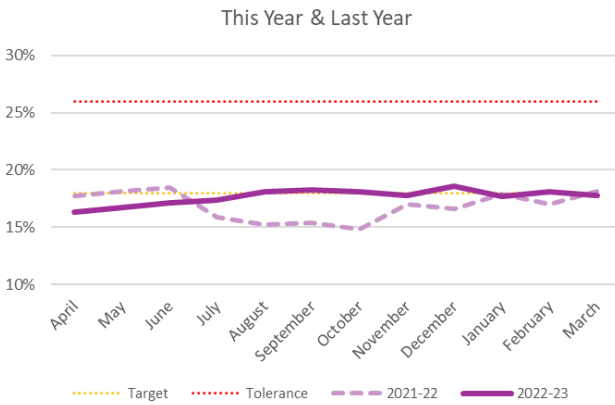
Northamptonshire	Statistical Neighbours	East Midlands	England
Best Stats Nei (2020-21)	Rank (2020-21)	Rank (2020-21)	Rank (2020-21)
3.5%			

Contextual data

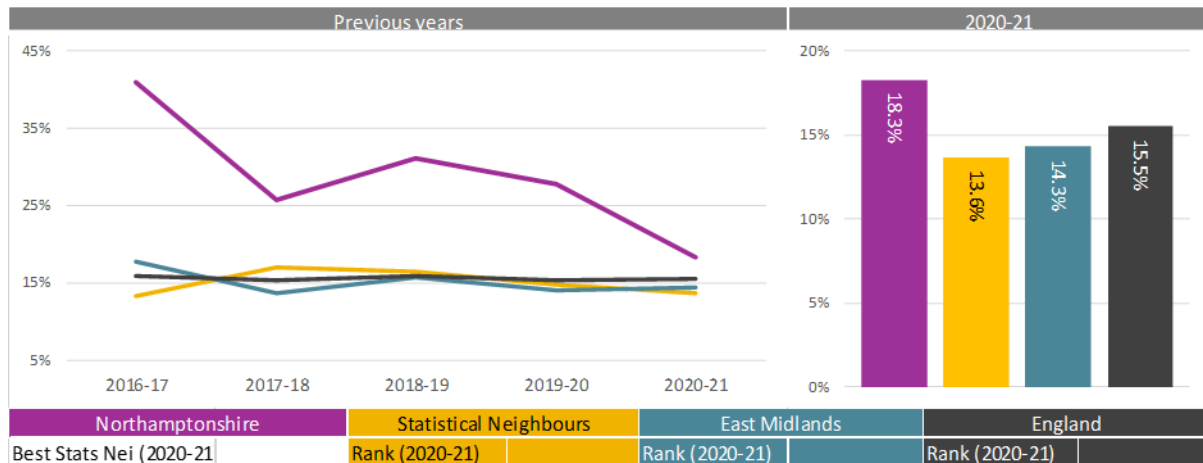


KPI 17 - % Social Worker posts filled with agency staff

2022/23 Overview

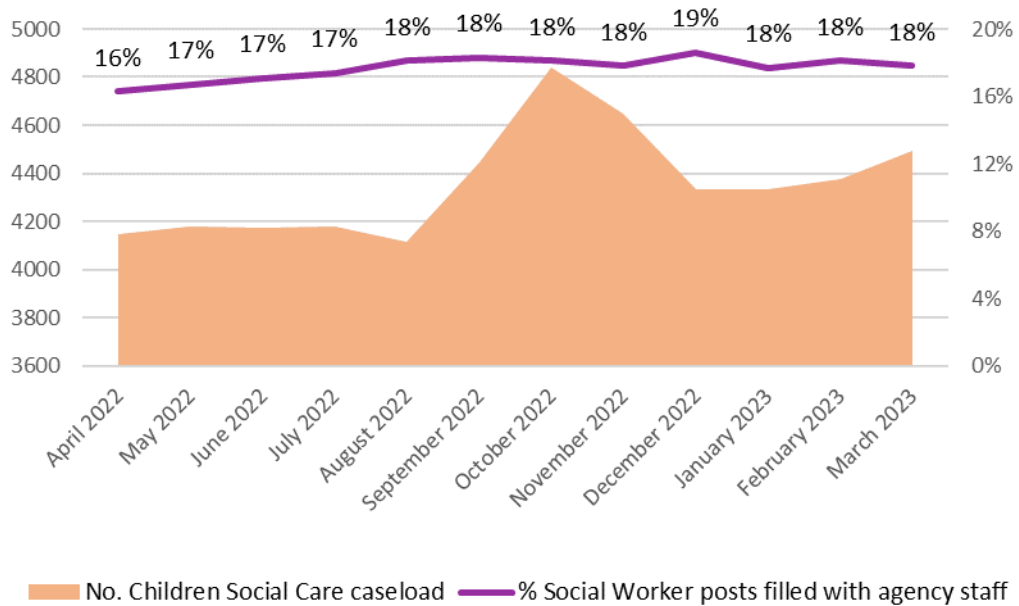


Benchmarking



Contextual data

Social Worker vacancies filled with agency staff in the last 12 months

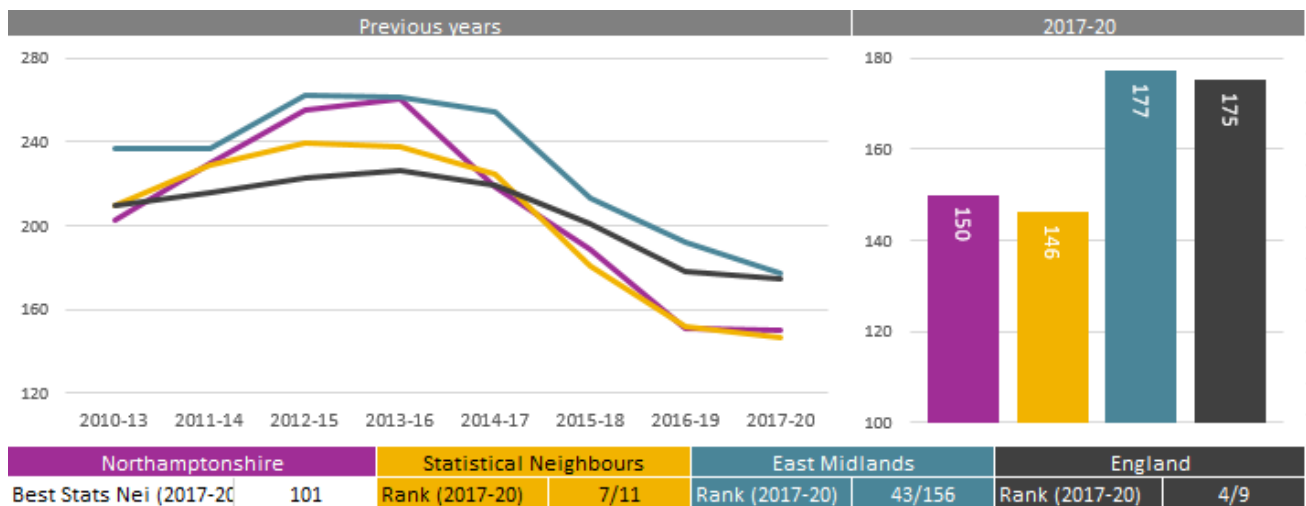


KPI 18 - Average time between the LA receiving court authority to place a child for adoption and deciding on a match

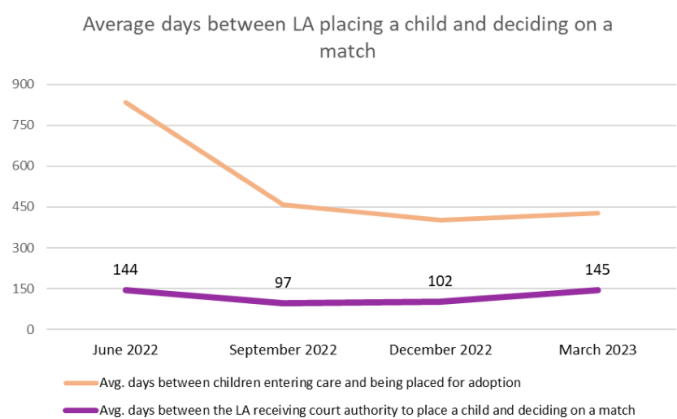
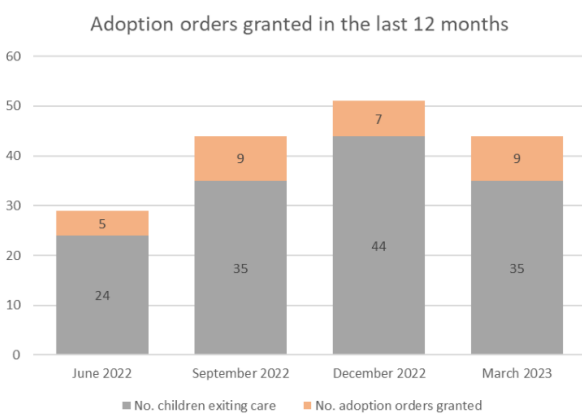
2022/23 Overview



Benchmarking

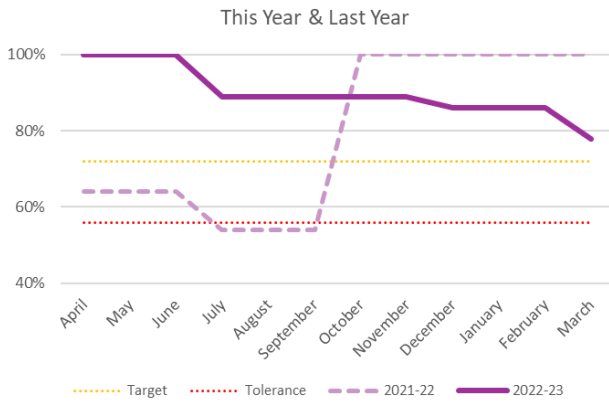


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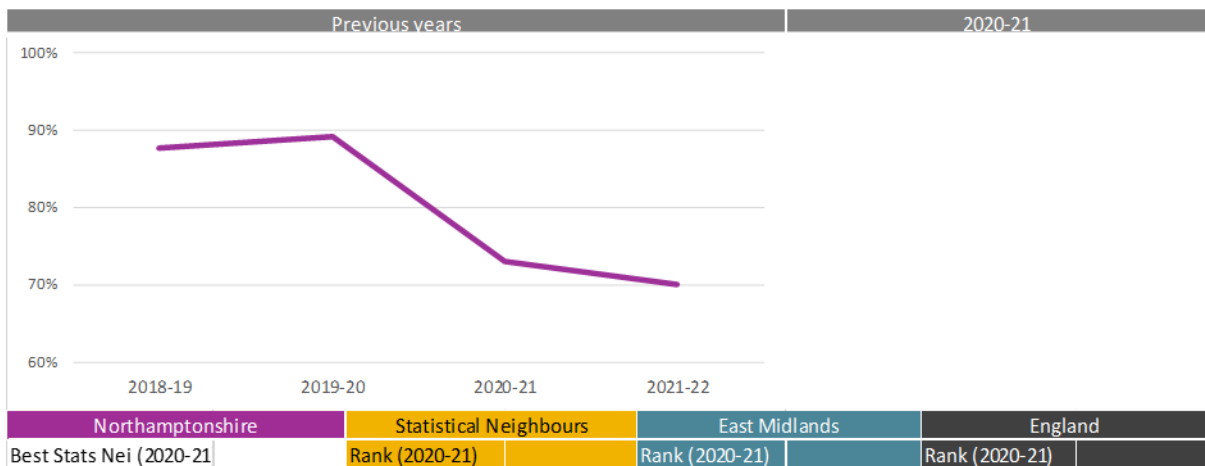


KPI 19 - % children in care placed for adoption within 12 months of an agency decision that they should be adopted

2022/23 Overview

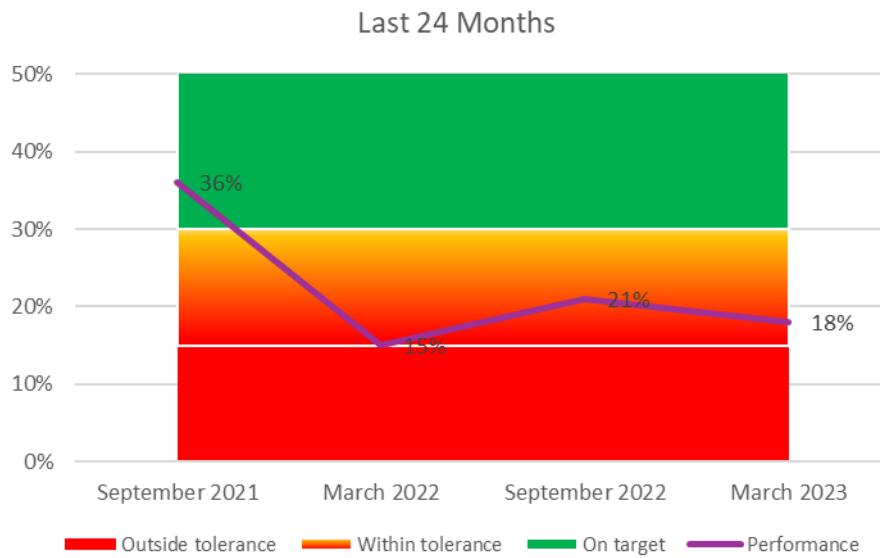


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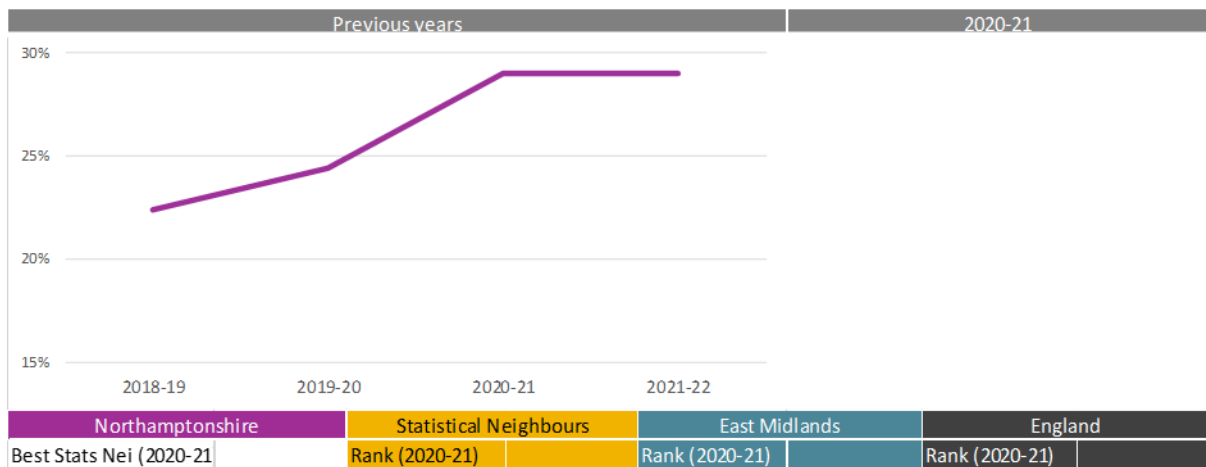


KPI 21 - % children leaving care due to permanence (Special Guardianship Order, adoption, residence order)

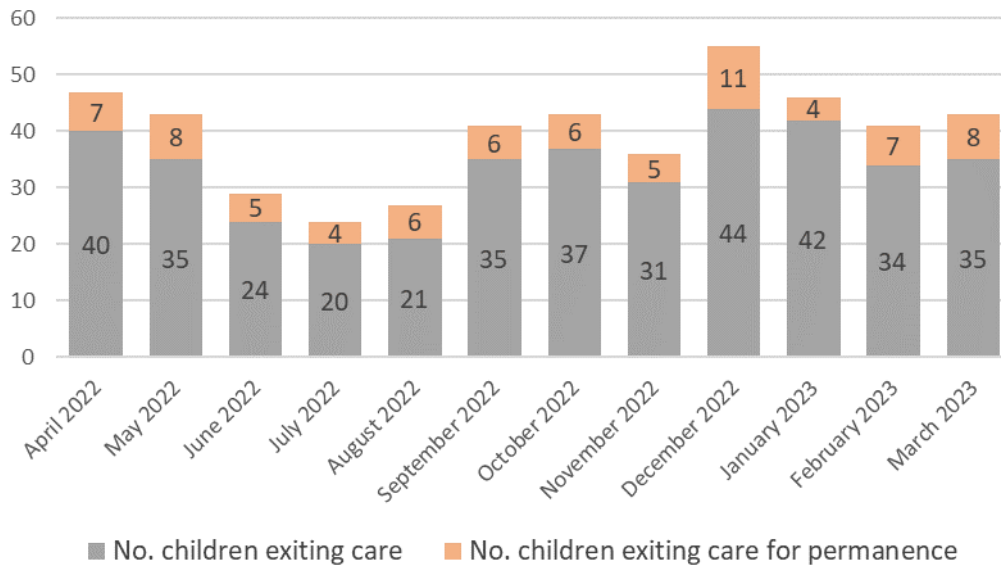
2022/23 Overview



Benchmarking



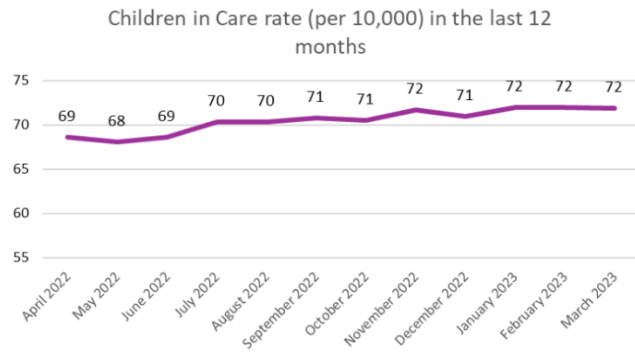
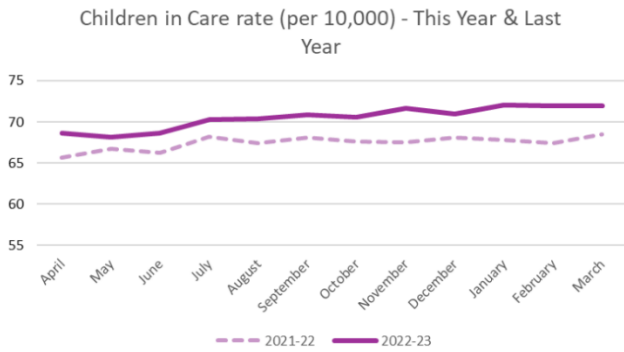
Children leaving care due to permanence



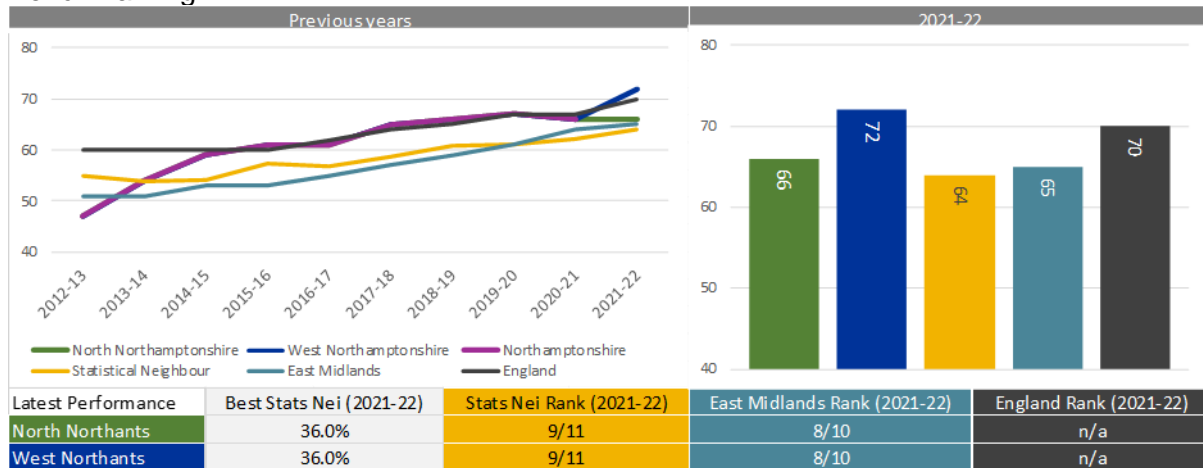
Appendix 2 – Supporting data analysis and NCT Performance Scorecard as at March 2023

Children in Care

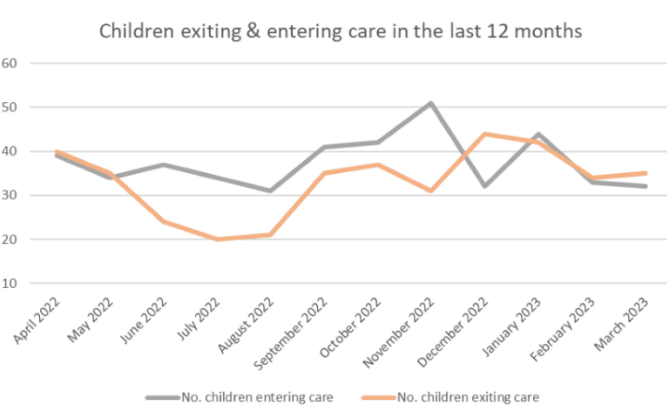
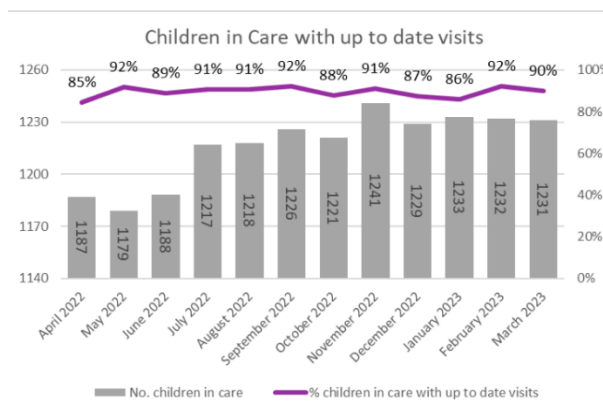
2022/23 Overview



Benchmarking

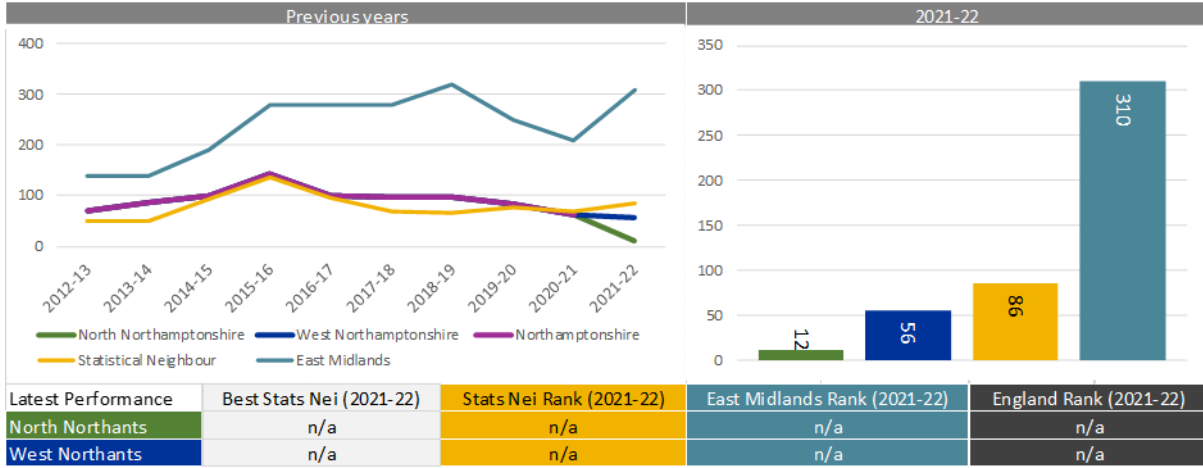


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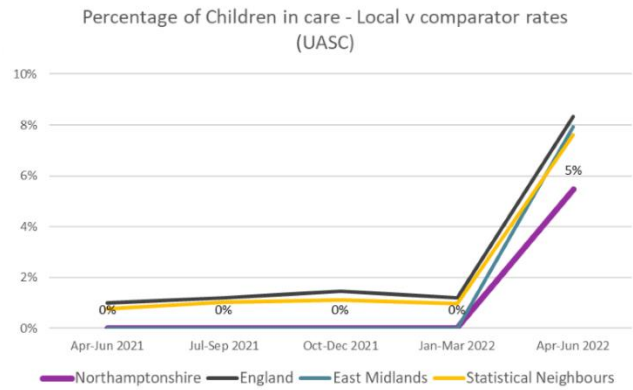
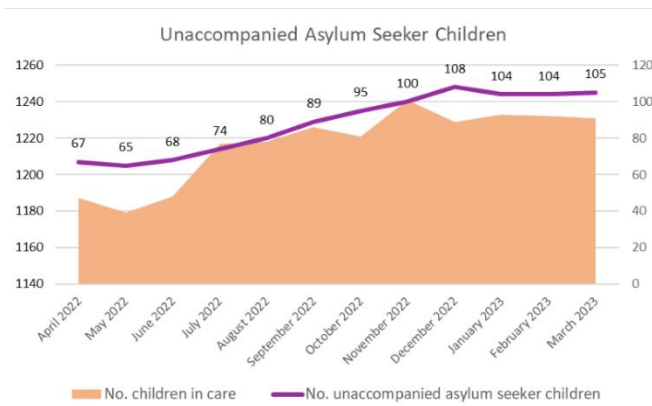


Separated Children

Benchmarking

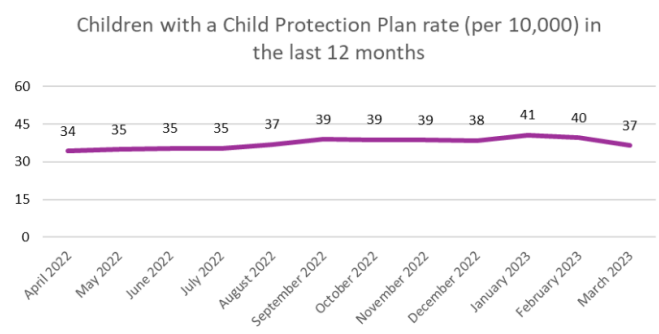
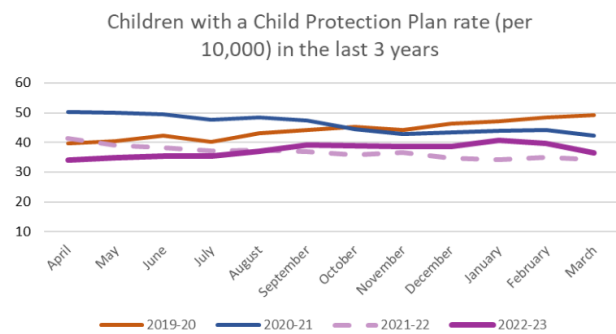


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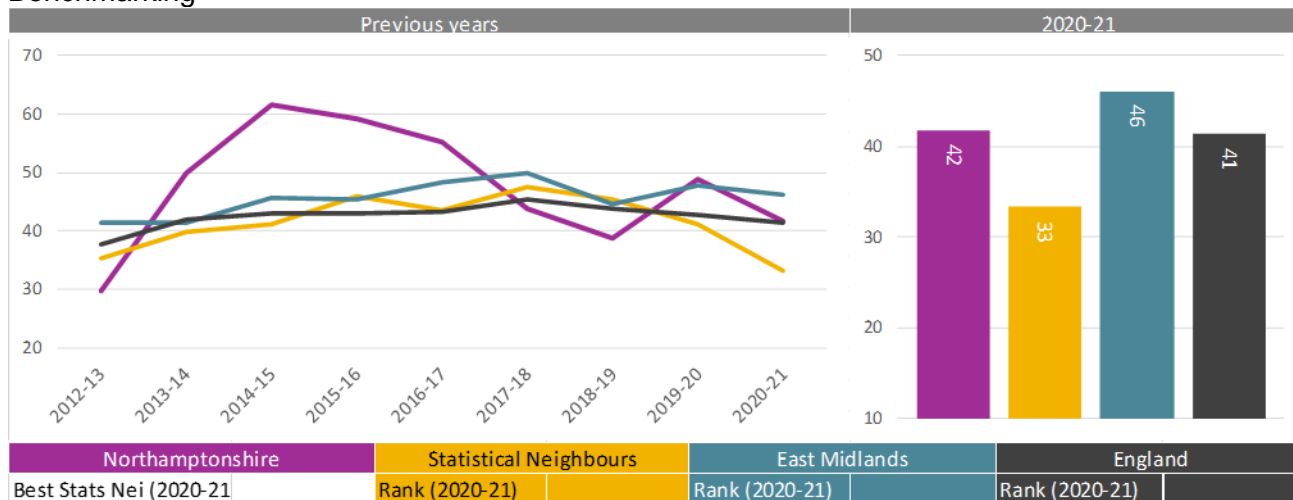


Child Protection Plans

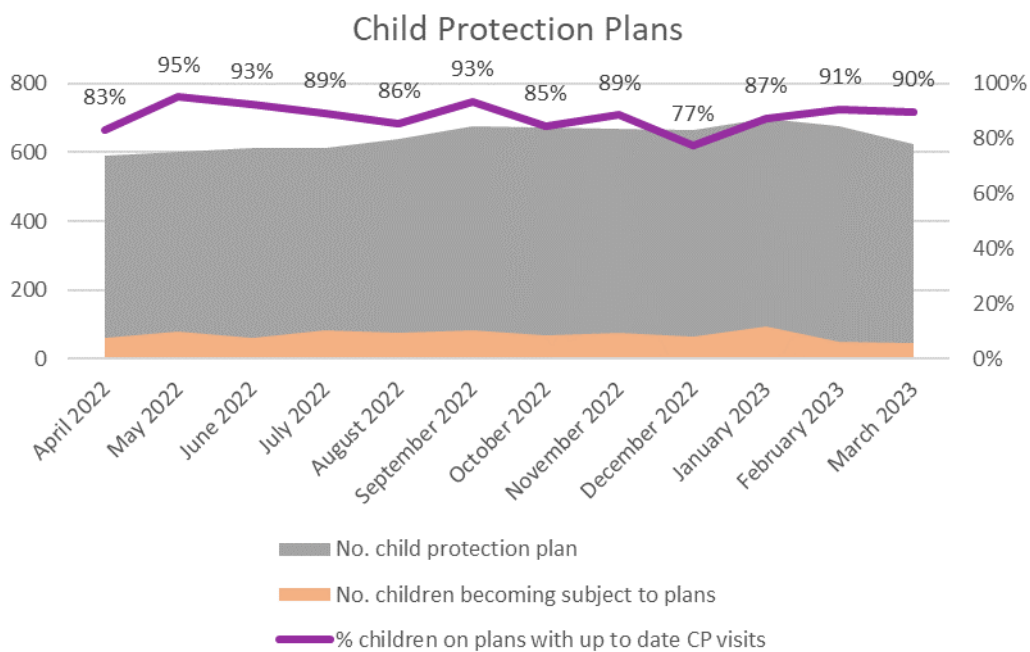
2022/23 Overview



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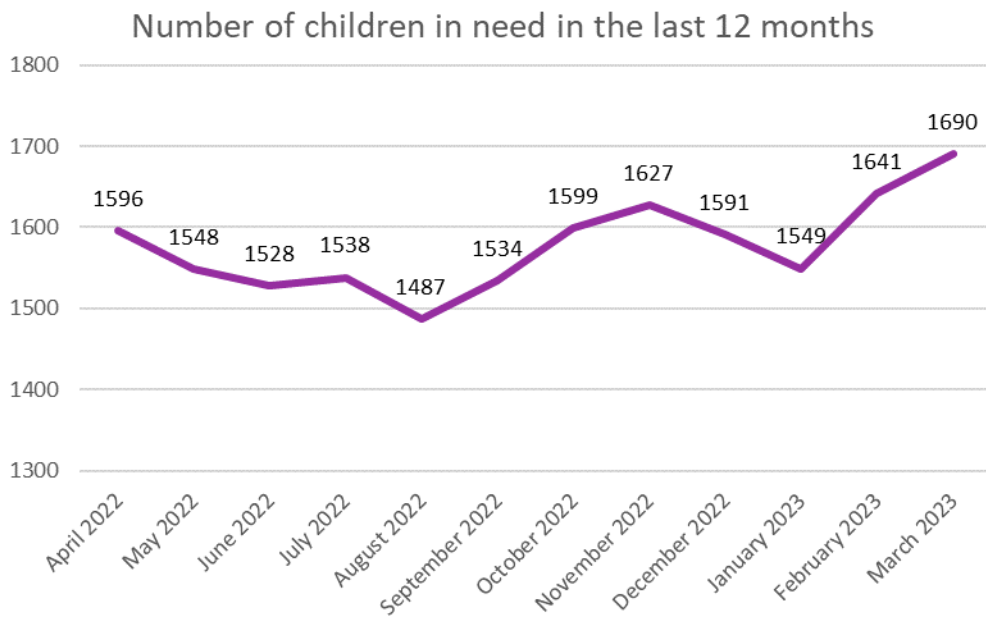


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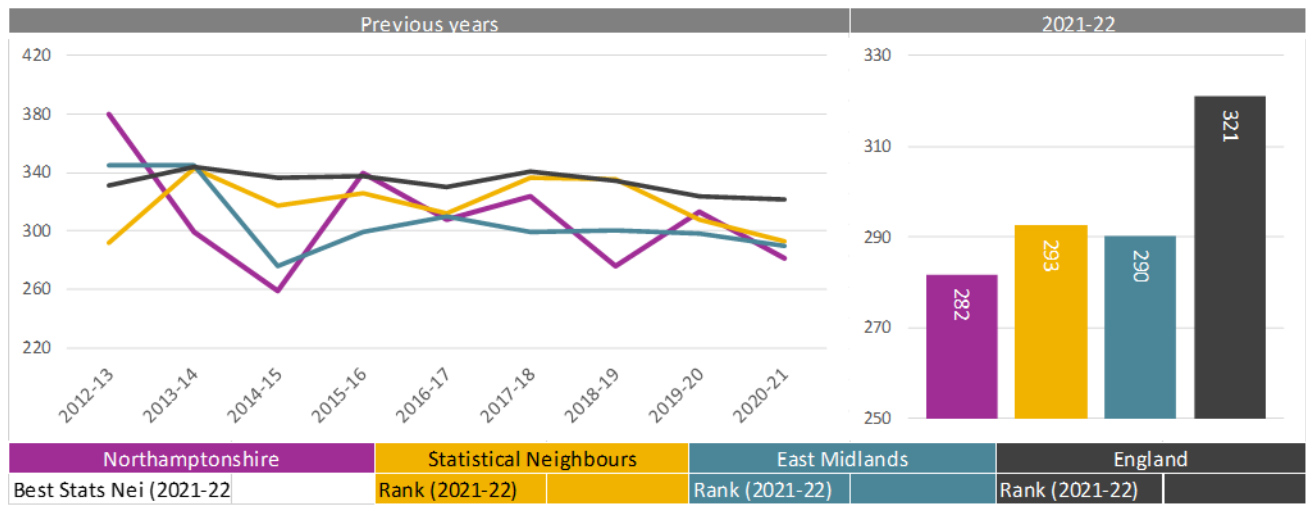


Children in Need

2022/23 Overview

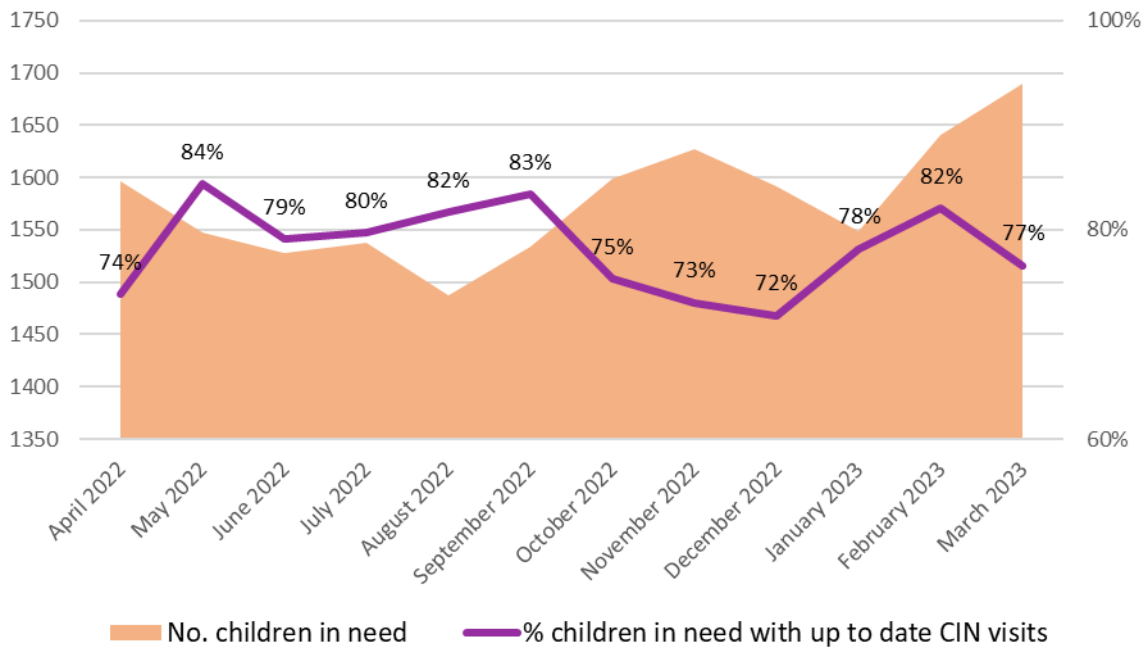


Benchmarking



Contextual data

Children In Need with up to date CIN visits



NCT Scorecard as at end March 2023



NCT Scorecard Mar
23.pdf

Appendix 4 – Support services KPIs

ID	KPI	Target	Q1 Outturn	Q2 Outturn	Q3 Outturn	Q4 Outturn	2022/23 Outturn
Web							
WEB02	% uptime of Northamptonshire Children's Trust website	99.00%	100.0%	100.0%	99.7%	99.8%	99.9%
WEB04	e-forms should have a customer rating of at least 3.5 out of 5. Any form with a lower rating will be reported back to the service for review	3.5	5.00	5.00	5.00	5.00	5.00
Payroll & HR Transactions							
PHRT01	Accuracy of underpayments for all employees paid monthly (based on fully completed and accurate forms being received by the published deadlines processed by the 2nd line Payroll Control Team)	99.00%	100.0%	99.7%	99.9%	99.8%	99.8%
PHRT02	% of standard forms processed in time for the monthly payroll, where these are received fully completed by the published deadline (Starter requests, Leaver requests, Written statement of particulars)	98.00%	100.0%	100.0%	100.0%	100.0%	100.0%
PHRT03	% of starter request forms processed in time for the monthly payroll, where these are received fully completed by the published deadline (includes Agency and internal movers)	98.00%	100.0%	100.0%	100.0%	100.0%	100.0%
PHRT04	% of leaver request forms processed in time for the monthly payroll, where these are received fully completed by the published deadline (includes Agency and internal movers)	98.00%	100.0%	100.0%	100.0%	100.0%	100.0%
PHRT06	% of written statement of particulars processed within SLA	98.00%	100.0%	100.0%	100.0%	100.0%	100.0%
Payroll & HR Helpdesk							
PHRHD01	% of incidents resolved within SLA (where SLA is the Helpdesk Priority / Resolution matrix)	70.00%	86.4%	83.8%	85.6%	95.4%	87.8%
PHRHD05	% of abandoned calls	<10%	7.1%	2.6%	0.0%	0.0%	2.4%
Learning & Development							
LD01	% of delegates rating that the training session was of a 'direct value to my work' was recorded as a 3 or above	95.00%	99.3%	98.8%	98.0%	100.0%	99.0%
Complaints							
New	Stage 1 complaints acknowledged and assigned by Complaints team within 48 hours of receipt	95.00%	94.4%	100.0%	97.1%	100.0%	97.9%
Customer Services							
CUS01	Proportion of customer calls answered	95.00%	94.7%	95.9%	97.4%	97.4%	96.4%
CUS02	Speed of response within 1 minute (service level)	80.00%	72.1%	79.2%	88.0%	86.2%	81.4%
CUS03	Call abandonment rate	<10%	5.0%	4.1%	2.5%	2.6%	3.5%
Procurement							
PROC01	% of procurement exercises completed to agreed target completion date	95.00%	100.0%	100.0%	100.0%	No Activity	100.0%

ID	KPI	Target	Q1 Outturn	Q2 Outturn	Q3 Outturn	Q4 Outturn	2022/23 Outturn
Property Services - West							
PROP01	% of reactive maintenance calls assessed within agreed priority timescales	90.00%	90.1%	95.7%	96.1%	96.7%	94.7%
PROP02	% of reactive maintenance tasks completed within priority timescales	90.00%	100.0%	95.7%	92.6%	92.8%	95.3%
PROP03	% of statutory compliance tasks completed within required timescales	100.00%	100.0%	100.0%	100.0%	100.0%	100.0%
PROP04	% of planned maintenance tasks completed within planned timescales	90.00%	100.0%	100.0%	100.0%	100.0%	100.0%
Property Services - North							
PROP01	% of reactive maintenance calls assessed within agreed priority timescales	90.00%	100.0%	100.0%	100.0%	100.0%	100.0%
PROP02	% of reactive maintenance tasks completed within priority timescales	90.00%	86.8%	93.0%	83.6%	90.0%	88.4%
PROP03	% of statutory compliance tasks completed within required timescales	100.00%	87.4%	100.0%	96.0%	96.2%	97.4%
PROP04	% of planned maintenance tasks completed within planned timescales	90.00%	84.6%	94.4%	94.7%	Not Reported	90.3%
Payments & Direct Payments							
PDP01	% of weekly compliant inputting and authorising processed	90.00%	99.6%	99.9%	98.7%	99.3%	99.4%
PDP02	% of compliant Direct Payment contracts	85.00%	91.3%	92.8%	100.0%	100.0%	96.0%
PDP03	% of overpayments processed within 10 working days	85.00%	100.0%	97.4%	88.5%	97.6%	95.9%

ID	KPI	Target	Q1 Outturn	Q2 Outturn	Q3 Outturn	Q4 Outturn	2022/23 Outturn
Accounts Payable							
AP01	% of HMRC compliant commercial supplier invoices registered on ERP within 5 working days of receipt into Accounts Payable	95.00%	100.0%	99.7%	99.4%	99.9%	99.7%
AP02	% of undisputed commercial supplier invoices paid within 30 days	95.00%	98.1%	98.5%	95.4%	98.5%	97.6%
AP03	% of undisputed commercial supplier invoices paid within terms	85.00%	89.0%	87.1%	84.7%	90.9%	87.9%
AP04	% of fully completed supplier requests processed within 3 working days receipt	95.00%	99.0%	100.0%	98.7%	100.0%	99.4%
Income							
INC02	% of income allocated in 7 days	60.00%	100.0%	82.8%	95.3%	91.7%	92.4%
INC01	% of income allocated in 30 days	95.00%	100.0%	100.0%	99.1%	99.5%	99.7%
Finance Helpdesk							
FOHD01	% of all reported incidents resolved within the agreed service standard set for the helpdesk priority	70.00%	94.6%	93.0%	88.0%	87.7%	90.8%
FOHD05	% calls abandoned	<10%	12.3%	13.6%	9.5%	3.8%	9.8%
Insurance							
INS01	% of claims recorded on management system and acknowledged to claimant or department within 5 working days	90.00%	100.0%	No Activity	100.0%	100.0%	100.0%
INS02	% of decisions on liability claims made and communicated to claimant in accordance with civil procedure rules (as per targets) excluding where the % of decisions on liability claims made and communicated to claimant in accordance with civil procedure rules (as per targets) excluding where the Insurance service has made a written request for evidence to the relevant service area and no reply has been received within required deadlines	95.00%	No Activity	100.0%	100.0%	No Activity	100.0%
INS03	% of cases where a full response was provided for non-complex underwriting enquiries (i.e. enquiries not requiring third party referral) within 5 working days	90.00%	No Activity	No Activity	No Activity	No Activity	No Activity
IT Services							
IT01	% Incidents Resolved within agreed performance standard thresholds in terms of response and resolution times	90.00%	92.0%	93.8%	92.0%	90.1%	92.0%
IT02	% Requests Resolved within agreed performance standard thresholds in terms of response and resolution times	90.00%	93.2%	91.6%	94.3%	89.9%	92.2%
New	% of calls abandoned	<10%	14.2%	8.0%	8.4%	3.0%	8.4%
IT04	Loss of IT systems (at least 72 hours) occurring	0 Incidents	1	3	2	2	8
Business Systems							
BS01	% of business-critical incidents raised via the Helpdesk regarding the ERP system responded to within one working day	95.00%	No Activity	No Activity	No Activity	No Activity	No Activity
BS02	% of non-critical incidents raised via the Helpdesk regarding the ERP system responded to within three working days	95.00%	97.6%	98.1%	97.1%	98.0%	97.7%
BS03	% of change requests raised via the Helpdesk regarding the ERP system considered and responded to within five working days	95.00%	100.0%	100.0%	100.0%	100.0%	100.0%

Appendix 5 – National context

Increasing pressure on budgets following the pandemic

[CIPFA performance tracker, 2023](#) reports on the impact of Covid and trends in children's services spending, and found that LAs spent £11.1 billion on children's social care in 2021/22, a 41% rise in real terms compared to 2009, while the children's population grew by less than 10% over the same period.

Rising need and complexity

[County Council network report](#): reports that in 2021-22 (the year after three national lockdowns) 30 out of 36 county local authorities overspent on their budgets by £317m. In total, four in five county local authorities – or 83% – overspent on their children's services budget in 2021-22. Nationally, all 151 councils with children's services responsibility overspent by £946.5m. Faced with this spike in demand, most councils in county areas have had little choice but to overspend on their children's services budgets to protect young people. Therefore, the forecasting of pressures in children's services is extremely challenging both within NCT and across the country.

[Safeguarding Pressures Phase 8 \(2022\)](#) showed that there was an overall increase in safeguarding activity between 2019/20 and 2021/22, reflecting greater complexity of needs, despite an initial reduction in referrals linked to lockdowns in the early stages of the Covid-19 pandemic. More children who were not previously known to social care services were presenting at a later stage, with greater levels of need and higher risks, and as a result, more children were immediately becoming subjects of child protection plans or care proceedings. Between 2019/20 and 2021/22, the number of early help assessments rose by 16%, the number of children in need increased by 4%, and the number of section 47 enquiries increased by 8%

The [Independent Review of Children's Social Care, 2022](#) found that only 56% of the increase in the numbers of children in care since 2013 could be explained by population growth and an increase in the number of unaccompanied asylum seeking children arriving. It found that children are staying in care for longer, with 12% fewer children leaving care in 2021 than in 2016. It estimated that, without implementation of the proposed reforms, total spend on children's social care is likely to rise to just under £12bn in 2024/25. Full roll out of the reforms will not be seen until 2025/26 at the earliest.

[Family Justice Observatory Deprivation of Liberty \(DoL\) data, 2023](#) between July 2022 and May 2023, the national DoL court issued 1217 applications across 153 different LAs, for a total of 1142 children. 53.8% of children subjected to a DoL order in July and August 2022 were placed in at least one unregistered setting in the first six months of the order being granted. This indicates "a lack of suitable regulated provision for children experiencing risk of criminal exploitation, emotional difficulties, behaviours that were a risk to others, and self-harm risks.". Over a six-month period, over 90% did not experience any relaxation to deprivations of their liberty.

Placement market

[Competitions and Markets Authority review of the children's social care placements market, 2022](#) described the challenges facing LAs, concluding that there are significant problems in how the placements market is functioning in England. There are not enough placements of the right kind, in the right places, which means that children are not consistently getting access to care and accommodation that meets their needs. The largest private providers of placements are making materially higher profits and charging materially higher prices than would be expected from a functioning market. Some of the largest private providers are carrying very high levels of debt which creates a risk that disorderly failure of highly-leveraged firms could disrupt placements. "The UK has sleepwalked into a dysfunctional children's social care market. This has left local authorities hamstrung in their efforts to find suitable and affordable placements in children's homes or foster

care.”. The short-notice closure of the Outcomes First Group demonstrated the impact that mass exit of such providers could have.

[S251 Data Outturn, 2022](#) reported that in 2021/22, LA gross expenditure on children and young people's services was £11.9 billion. £3,672 million was spent on in-house and independent fostering and children's homes placements in 2020/21. This is an increase from £2,670 million in 2015/16, or 37.5% (not real terms). The corresponding increase in the number of children in care was 14.8%. Private residential placement costs increased the most, by 90.56%, while LA placement costs increased by 18.78%

[Children's Home Association's State of the Sector Survey 2023](#) highlighted the private sector's approach to formal procurement and tendering, with over a third not engaging with formal processes (twice as many as in 2021) and half of all providers selectively considering which tenders to bid for. 22% of all providers also reported choosing to leave a commissioned framework in the last year, all of whom experienced no negative consequences following the decision (up from 17% in 2022).

Regulatory regime for supported accommodation

[Demand and Capacity of Homes for Children in Care \(CCN, LIIA, Newton, 2023\)](#) found that between 2019 and 2022, the number of young people living in supported accommodation increased by 21.3%. While demand is growing, only 81% of existing placements are expected to register as per the new registration requirement, with almost 20% put off by cost and reputational risk, meaning a potential fall in capacity of 3,676 beds across England. This increased demand coupled with inflation and administrative burdens from the new regulations is predicted to add £368m to LA spend on supported accommodation by 2026/27

Workforce

[The Independent Review of Children's Social Care, 2022](#) estimated the additional cost of employing agency staff at approximately £26,000 per worker per year (53% of the average social worker salary), indicating a loss of over £100 million per year. DfE data (2023) shows that the agency social worker rate increased from 16% in 2021 to 18% in 2022, with 13% more agency social workers in total in 2022. Safeguarding Pressures Phase 8, (2022) reported that 44% of respondents stated that there was never or rarely sufficient social workers in the right places to effectively support children, resulting in greater risk for children and families, higher caseloads and increased waiting lists and delays.

Children's social care pressures

- Growth in child poverty/cost of living crisis - regional statistics summarising the latest data on local child poverty after housing costs ([End Child Poverty Coalition, 2023](#)). Between 2015 and 2020, it was estimated that 8.1% of children entering care was linked to rising child poverty ([NIHR, 2021](#))
- Lack of sufficiency of placements and rising costs/profitteering from private companies ([CMA, 2022](#))
- Impact of the supported accommodation reforms ([CCN, LIIA and Newton, 2023](#))
- Rising numbers of UASC through the national transfer scheme, and lack of funding for UASC care leavers ([Safeguarding Pressures Phase 8 \(2022\)](#))

Mental health pressures

- Growth in demands for mental health support ([NHS Digital, 2022](#))
- Inadequate children's mental health services including a reduction in tier 4 beds and a lack of shared accountability with health partners ([CYPMHC, 2023](#))
- High costs of unregistered placements for children with the most complex needs/increase in DoLs ([Nuffield Family Justice Observatory, 2023](#))

Workforce pressures

- Social workers – agency workforce issues highlighted in the [ADCS response to the Child and Family Social Worker Workforce consultation](#)

Source: ADCS

Appendix 6 – NCT Annual Internal Audit Report 2022/23

Internal audit: Annual report and statement of assurance 2022-23 on the following 5 pages

1. Summary of Internal Audit 2022-23

1.1 This report details the work undertaken by internal audit for Northamptonshire Children’s Trust (the Trust) and provides an overview of the effectiveness of the controls in place for the full year. Internal Audit has been provided to the Trust via a service level agreement with West Northamptonshire Council (WNC) Internal Audit Service.

1.2 2022-23 was a challenging year from an audit perspective, with a large proportion of activity relating to audits initiated as part of the 2021-22 plan outstanding, following the issue of the annual audit report for 2021-22. These were reviewed and delivered by BDO, an external provision partner. The 2022-23 plan was also reviewed, and 4 audits removed to prioritise impactful audits, leaving 5 audits which were delivered by the WNC audit team.

1.3 5 audits relating to the 2021-22 plan were issued as final reports in 2022-23; the working papers for these audits have been reviewed to ensure that sufficient 2022-23 evidence was covered, and they could be included in the 2022-23 opinion.

1.4 The 5 audits delivered as part of the 2022-23 plan were supported by 4 audits relating to WNC services provided to the Trust. The insourcing of the WNC audit team has led to delays in the delivery of audits, and the completion of the plan has been challenging, with 2 audits at draft report stage awaiting management response at the time of this report.

1.5 Appendix A details the outcome of the audits delivered, with a summary in the table below.

Audit	Audit Status	Assurance Rating		
		Control Environment	Compliance	Org Impact
2021/22 – Plan; 2022/23 Assurance				
Services - Foster Care and Special Guardianship Payments	Final Report	Good	Good	Minor
Services - Placement Contract Management	Final Report	Satisfactory	Satisfactory	Moderate
WNC - IT Systems Security - Carefirst System	Final Report	Limited	Satisfactory	Moderate
Key Financials - Payroll	Final Report	Good	Substantial	Minor
WNC - Services - Social Care Transport	Final Report	Satisfactory	Limited	Major
2022/23 – Plan and Assurance				
Overarching Safeguarding Arrangements	Final Report	Good	Good	Minor
Corporate Parenting - Leaving Care s24	Final Report	Satisfactory	Satisfactory	Minor
Corporate Governance Framework (incl Ofsted Improvement Plan Monitoring)	Draft Report	Good	Good	Minor
Social Work Workforce	Final Report	N/A – Briefing Note Report - no ratings issued.		
Fostering Service (In-house Independent Fostering Agency)	Draft Report	N/A – Interim Report issued – no ratings issued further work planned for 2023/24.		
Sustainability – corporate parent role	Removed			
MTFP and budget management	Removed			
ICT – network infrastructure security	Removed			
ICT – privileged access control	Removed			
WNC Service Audits				
IT Disaster recovery	Complete	Limited	Limited	Moderate
IT Cyber security	Complete	Limited	Limited	Major

Audit	Audit Status	Assurance Rating		
		Control Environment	Compliance	Org Impact
Payroll Transaction Testing	Complete	Good	Good	Minor
ERP Gold IT User Access Controls	Complete	Good	Good	Minor

2. Executive summary – Head of Audit opinion

2.1 The role of internal audit is to provide an opinion to the Trust, through the Finance, Resources and Audit Committee, on the adequacy and effectiveness of the internal control system to ensure the achievement of the organisation’s objectives in the areas reviewed. The annual report from internal audit provides an overall opinion on the adequacy and effectiveness of the organisation’s risk management, control, and governance processes, within the scope of work undertaken by Internal Audit. The basis for forming our opinion is as follows:

- An assessment of the range of individual opinions arising from risk-based audit assignments contained within internal audit plans that have been reported throughout the year.
- This assessment has taken account of the relative materiality of these areas and management’s response to agreed actions.
- Management investigation and response to issues raised from fraud investigations.

2.2 We can provide **satisfactory assurance** that there is a sound system of internal control, designed to meet the Trust’s objectives, and that controls are being applied consistently.

Assignment	Audit Status	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
2021/22 – Plan; 2022/23 Assurance								
Services - Foster Care and Special Guardianship Payments	Final Report	Good	Good	Minor	0	0	2	<ul style="list-style-type: none"> New/ceased Foster Care and Special Guardianship Orders (SGO) payments, overpayments and one-off discretionary expenses had sufficient supporting evidence. The system design could be improved by reviewing the policies and procedures. It can further be strengthened by including who prepared the reconciliation. Policies and procedures relating to Foster Care and SGOs have not been reviewed within a timely manner or version control is missing. The payment run reconciliation has no information in relation to who has completed and reviewed leading to risk of lack of adequate audit trail, segregation of duties and accountability.
Services - Placement Contract Management	Final Report	Satisfactory	Satisfactory	Moderate	0	5	1	<ul style="list-style-type: none"> Evidence of a best match form and approval in line with the Scheme of Delegation. Evidence of invoice review against IPA's, sample checking of payments and evidence of final review and approval for payments. No placement review and approvals panel. No formal IPA or documentation for in-house fostering placements Processes for best match forms not completed due to the recent back log. Review of monthly placement management reports found there is no documented action plan detailing actions to be completed and expected completion dates
IT Systems Security - Carefirst System	Final Report	Limited	Satisfactory	Moderate	4	2	2	<ul style="list-style-type: none"> The system is outdated and not user friendly, which creates duplication and inefficiencies. Roles and responsibilities in relation to the system support management have not been clarified and confirmed to ensure the most effective and efficient use of resources. Current arrangements for user access are duplicated. Changes to user accounts are not proactively notified by the relevant managers. Business continuity planning and back up arrangements were not documented.

Assignment	Audit Status	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
								<ul style="list-style-type: none"> There are limited improvements that can be made to make the system more user friendly and compatible with the modern technology. There are easy to complete online forms. Security declaration and CareFirst training are being completed and supporting evidence is in place. There are documented data entry procedures. The system is regularly backed up and backups are checked and confirmed.
2022/23 – Plan and Assurance								
Overarching Safeguarding Arrangements	Final Report	Good	Good	Minor	0	2	1	<ul style="list-style-type: none"> Job descriptions should be reviewed and updated as required. Develop a robust system of monitoring and reporting to evidence training takes place in respect of Rapid Reviews and Children Safeguarding Practice Reviews Consider making safeguarding training mandatory for all NCT staff
Corporate Parenting – Leaving Care s24	Final Report	Satisfactory	Satisfactory	Minor				<ul style="list-style-type: none"> Transition to Adulthood (Leaving Care) – Financial Policy and Guidance should be revised and approved at an appropriate level. The Operational Group should be specifically tasked with investigation of the reasons for and setting up corrective action to bring Pathway Plan KPIs back in line. Management should ensure that required service improvements arising from the Collaborative Reflective Practice Discussion Review Practice Week have been or are being actioned.
Corporate Governance Framework (incl Ofsted Improvement Plan Monitoring)	Draft Report	Good	Good	Minor	0	4	3	<ul style="list-style-type: none"> Key policies had not all been published, and some appeared to not be up to date or include adequate version control.
Social Work Workforce	Final Report	N/A – Briefing Note Report issued						<p>Strategic level review</p> <ul style="list-style-type: none"> Workforce Development Strategy demonstrates a focus on leadership, manager support of staff and initiatives for recruitment and retention. Further review of how the workforce is using the strategy and how it is embedded required

Assignment	Audit Status	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
Fostering Service (In-House - Independent Fostering Agency)	Draft Report	N/A – Interim Report issued – further work planned.			0	1	0	Scope amended and agreed with management after consideration of Ofsted report. Focus on replacement content management system: development of specification and controls until new system in place. Further work planned for 2023/24.
West Northamptonshire Council provided services								
IT Disaster recovery	Complete	Limited	Limited	Moderate	0	7	0	Management action plan in place
IT Cyber security	Complete	Limited	Limited	Major	10	3	0	Management action plan in place
Payroll transaction testing	Complete	Good	Good	Minor	0	1	3	Management action plan in place
ERP Gold IT user access controls	Complete	Good	Good	Minor	0	2	0	Management action plan in place
Removed audits								
Sustainability – corporate parent role		Removed						
MTFP and budget management		Removed						Included in 2023/24 plan
ICT – network infrastructure security		Removed						
ICT – privileged access control		Removed						

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Northamptonshire Children's Trust Independent Fostering Agency

Annual Report 2022 – 2023



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1. Introduction

This is a report on the performance of the Northamptonshire Children's Trust (NCT) Independent Fostering Agency in line with the National Minimum Standards (2011) and Statutory Guidance.

It provides details of NCT's Independent Fostering Agency activity from 1st April 2022 to 31st March 2023 and sets out plans for service development until 31st March 2024.

This annual report should be read in conjunction with the Independent Fostering Agency Statement of Purpose.

The Independent Fostering Agency had its second Ofsted inspection in February 2023 and the overall judgement of our service is 'Inadequate'.

The observations and findings of the Inspectors have framed the ongoing improvement plan for the Fostering Service, where areas of practice and delivery of service needs to be focused and the following areas have been identified:

- An effective electronic recording system.
- Consistent recording and practice which clearly evidences risk and response to this.
- Children being seen by SSWs and meaningful discussion had with the child.
- Quality supervision of foster carers.
- Quality supervision of SSWs and Practice Managers.
- Safeguarding practices and knowledge of the staff working within the Fostering Service needs to be improved.

The service has produced a service improvement plan, with agreed team objectives, targets, and timescales for completion. Progress against the action plan is reported back to the senior leadership team and NCT's governance board. Following the Inadequate judgment received as a result of the full SCCIF Inspection undertaken from the 6th to the 10th February 2023, the Fostering Service remains subject to three Compliance notices issued by OFSTED, with a monitoring visit undertaken on the 11th April providing some assurance of the steps already taken by the Agency to address the arising areas of concern and deficit in practice.

The service has a clear understanding of what is required in relation to the key areas of improvement and continues to have very high ambitions to ensure foster carers receive training, support, and consistent effective supervision to enable them to offer the highest quality of care to children and that our children's voices are very clearly heard and children are regularly seen by the foster carers' supervising social workers.

2. Our Vision, Service Structure and Function

Northamptonshire Children's Trust base locations



The Independent Fostering Agency delivers the statutory Fostering functions for both North and West Northamptonshire. As such they are centrally based in Northampton but can work from other local offices.

The Strategic Manager with responsibility for the Fostering Service also holds responsibility for NCT VAA (Voluntary Adoption Agency) and Children's Homes and the Assistant Director has oversight of the Corporate Parenting Service within which the Fostering Agency sits. Both Strategic Manager and Assistant Director operate across the two unitary councils.

Our overarching aim is to provide secure and loving homes to children in need of foster care and to support those children and their families as long as this is needed.

The service shares the key aims and objectives of Northamptonshire Children's Trust (NCT) in believing that all children and young people have the right to be healthy, happy, and safe; to be loved, valued, and respected; and to have high aspirations for their future.

We want all children to have secure relationships with family, friends, and carers, be eager, excited, curious, and engaged in learning, have self-confidence, be able to co-operate and communicate socially, and have the best possible health and development.

Our Vision:

“ Children, Young People and Families at the heart of all we do - in every decision we make and every action we take. ”

3. Staffing



Additionally, a further specialist SSW post has been agreed for the Recruitment and Training Team to specifically supervise and support our cohort of Resilience foster carers. Recruitment activity to this position is ongoing.

NCT’s Independent Fostering Agency comprises of four fostering teams:

- Recruitment, Training and Assessment team
- Post Approval teams x 2
- Connected Persons’ team

The teams undertake statutory functions of assessment, approval, supervision, support, training, and development, safeguarding and review of foster carers. All fostering teams work in partnership with the Duty and Assessment, Safeguarding and Children in Care (CIC) Services to ensure children’s care plans are progressed with minimum delay and children are provided with the best possible in-house care. Supervising social workers and practice managers attend placement planning, permanency planning and placement stability meetings, CIC reviews and all other relevant statutory and non-statutory meetings for children.

The Independent Fostering Agency seeks to build positive relationships with professionals providing a ‘team around the child’ approach, ensuring partners work to best meet children’s needs. A fostering duty system operates daily to support the function of the NCT’s Placement Management Service, who are responsible for sourcing placements both internally within Northamptonshire and externally, by identifying internal foster placements and emergency carers. A duty team manager provides management oversight of placement activity. Additionally, a second duty worker supports the duty telephone response to foster carers on a daily basis. The Fostering Duty Hub are based together to provide a consistent managerial oversight.

Northamptonshire Children’s Trust Independent Fostering Agency provides a range of short term and permanent placements with foster carers who have a diverse range of skills and experience.

4. Summary of the service developments and challenges 2022/23

Key developments during 2022/2023

Whole service

- Improved our data set for managers to monitor performance in relation to statutory compliance. Reporting systems have been reviewed and an interim recording system has been introduced to ensure compliance can be effectively monitored. Redeveloped recruitment pipeline data and monthly performance meetings to drive assessment performance and recruit more foster carers.
- Review of existing policy and practice documents, practice guidance and 'HOW TO' guides written for all key practice changes or updates and to support new ways of working. These are shared with the relevant stockholders as appropriate, to include our foster carers and independent panel members when relevant.
- An incumbent registered manager remains in post to provide stability for the service and lead the necessary improvements and high aspirations for the service.
- Whole Service development days continue to be held on a quarterly basis with staff to be clear of the vision and expectations, to ensure all team members understand the importance of their role and how they can most effectively work together to achieve the continuing improvements of the service. These days provide an opportunity for review and implementation of new policy and practice as well as guest speakers to enhance the wider learning across all of the Fostering Services. Within this year, guest speaker topics have included 'The voice of the child' delivered by a care experienced adult, MBAM training delivered by our clinical psychologist, specialist 'Parent and Child' training as well as a SCCIF framework development workshop.
- Bi-monthly meetings continue to be held between the management team, panel adviser and panel chairs have been established supporting the ongoing development of the professional relationship between the panel and the agency.
- All managers have participated in Leadership and management training with positive impact on practice and culture. Focused on enabling managers to empower each other, staff, children and families and build positive culture.
- Signs of safety (SOS) training has been provided to managers and staff and this strengths-based and empowering practice model continues to be embedded, we have several SOS champions within the service to support this area of practice development. Further workshops in respect of the SOS model for foster carer's daily recordings are planned into this next financial year to further embed this practice.

Recruitment

- Streamlined forms for recruitment, through to assessment and support, including Matching, Placement planning documents, Safe care documents, Risk assessment templates have been revised and or introduced.
- The Digital Marketing Specialist role is now embedded in NCT's Communications team and supports Fostering recruitment.
- Re - shaped our front door approach and appointed a recruitment coordinator to ensure enquiries are followed up within 24 hours.
- Further developed a 'step down' pathway from Residential Care to Fostering through the Resilience scheme, which provides support to children to 'step down' from residential care and 'break the cycle' of children experiencing multiple placements moves. We now have 6 approved Resilience foster carers with 5 young people currently in place.
- Continued to develop joint and emergency viability assessments when undertaking Connected Carers Assessment, which has supported timely decision making, and has seen an increase in initial viability assessments being undertaken prior to placement of the children.

Training and support

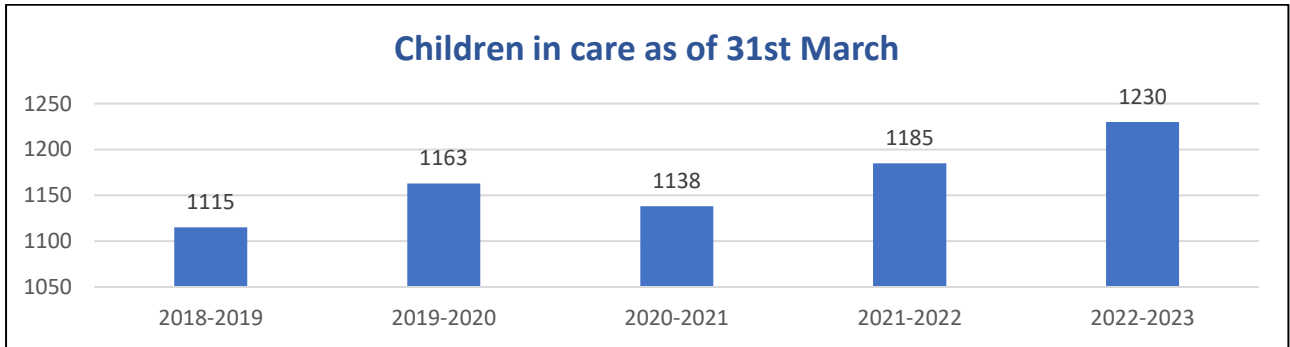
- Approaches to retention continue to be developed, including exit interviews and the use of retention meetings with foster carers who are thinking of leaving, and a clear pathway for engagement with foster carers who are 'on hold' to enable them to return to fostering in a timely manner.
- Managers' retention visits to foster carers remain an ongoing requirement of our carer retention and quality assurance framework.
- Continue to further embed the Public Health funded fostering project. The aim of this project is to develop the skills and knowledge of supervising social workers and foster carers in understanding the emotional needs of children who have experienced abuse and neglect developing therapeutic parenting techniques. It facilitates the commissioning of therapeutic interventions for children and carers, with the aim of improving mental health outcomes for children and to improve placement stability as well as specialist training social work staff working within the Fostering Service such as Dyadic Developmental Practice (DDP).
- Clinical Psychologist role is embedded, and staff are benefitting from specialist advice and guidance. Individual consultations have been offered to foster carers to support them in their fostering journey, especially in consideration of blocked care and achieving placement stability.
- Foster carers continue to have funded access to the National Association of Therapeutic Parenting. This provides foster carers with access to training, webinars and networks of support with a focus on therapeutic approaches.
- The training provided to foster carers has been reviewed; there are plans to expand on existing training opportunities, and others have been introduced or re-introduced following foster carer feedback.

Key challenges during 2022/2023

- We have a high number of beds on hold (49 beds on 31st March 2022 compared to 8 the previous year).
- Recruitment & retention of foster carers. There has been a slight increase in resignations of foster carers, and we have recruited fewer households than in the previous year. This appears, anecdotally, to be in line with the experience of other Local Authorities and Fostering Agencies. Further exploration of the current situation around recruitment and retention nationally is needed to fully understand how NCT's Fostering Agency fared in comparison to others and what we can do differently to address sufficiency issues.
- Information Systems: The data required for the fostering service to monitor progress has continued to improve during this year but remains an area of significant challenge. We cannot use the Care First recording system to accurately collect data on the various approval details or vacancies, manage payments easily and accurately or provide adequate data on carers subject to concerns or complaints. Individual children's records have been created within TEAMS but remain vulnerable to corruption and are not able to 'talk' to any of the other systems that the Fostering Service is currently using which makes managerial oversight and tracking of actions/ practice clumsy.
- Staff recruitment has been a significant challenge for the majority of this financial year, however, this is now an improving picture.
- We have a high number of children living within family and friends' arrangements, standing at 119 fostering households caring for 174 children. A task and finish group has carried out a review and a whole systems approach has been taken in relation to changing the culture and ways of working to make sure Special guardianship is encouraged where appropriate and in line with the children's needs. This remains a targeted focus of the Fostering Service. Dedicated workshops for all social work practitioners have been jointly delivered by the Fostering Service and the post order team who are responsible for SGO support.
- To continue to progress and work within all elements of the improvement plan to address the points raised within the compliance notices. This will include regular review and Quality Assurance activity, self-evaluation and reporting to both NCT's SLT and monitoring visits from OFSTED. Ongoing policy and practice review will continue to inform the Improvement plan.

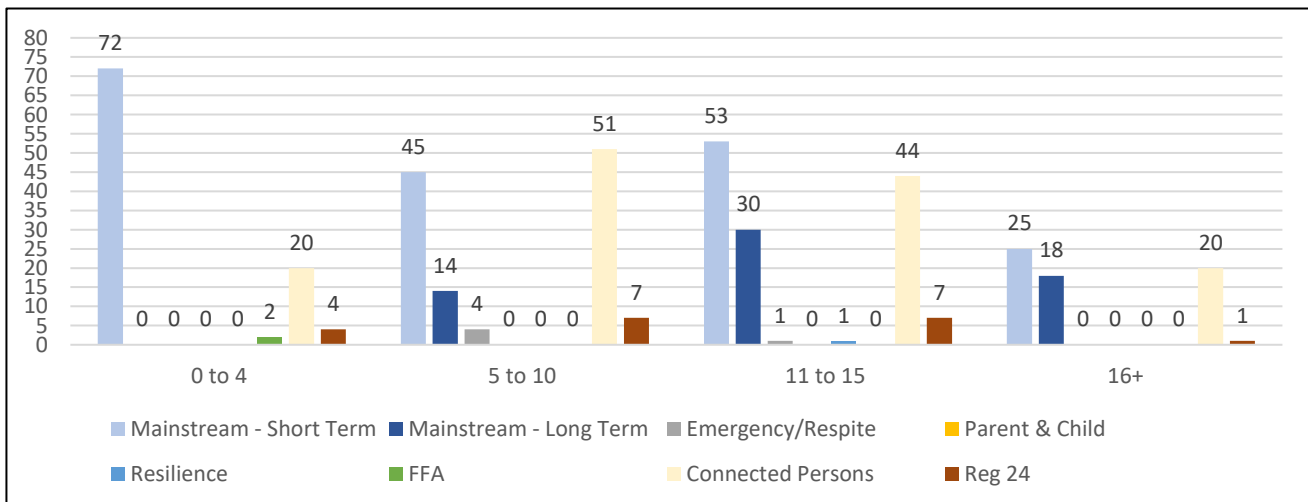
5. **The Children We Care For**

The graph below shows a snapshot of the number of children in care figures over the last 4 years. This graph shows a decrease in the year 2020 – 2021, anecdotally considered to be in part due to the COVID pandemic conditions but a significant rise for last year and this year. Not only does the continued rise in children in care create increased sufficiency pressures, but there is also the churn in children in care population during the year which can create pressure with seasonal increase in demands for fostering placements.



Children living with in house foster carers categorised by age groups

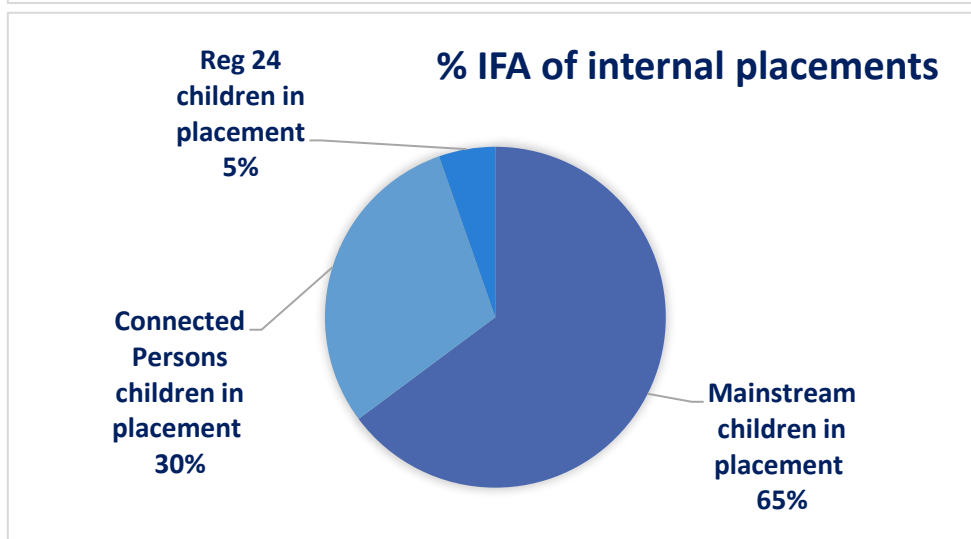
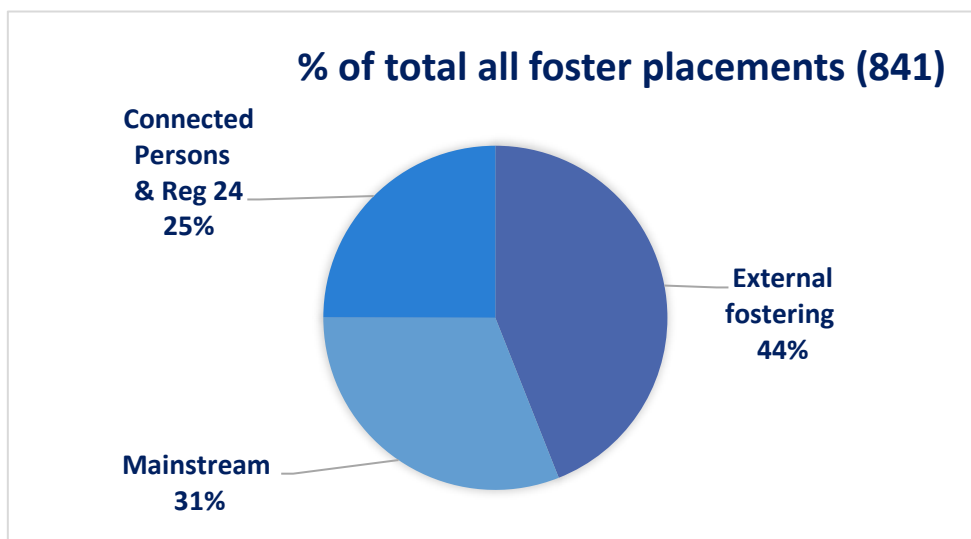
Approval	Age Groups			
	0 to 4	5 to 10	11 to 15	16+
Mainstream - Short Term	72	45	53	25
Mainstream - Long Term	0	14	30	18
Emergency/Respite	0	4	1	1
Parent & Child	0	0	0	0
Resilience	0	0	1	0
FFA	2	0	0	0
Connected Persons	20	51	44	20
Reg 24	4	7	7	1
Total	98	121	136	64



As last year, demand for placements for children aged 11+ remains high with 11–15-year-olds consistently being the largest group of children living in in-house foster homes.

Proportion of children living in internal and external foster placements

Fostering breakdown	Number of Children placed in foster care	% of LAC 1227	% of total all foster placements (841)
External fostering	370	30%	44%
Mainstream	261	21%	31%
Connected Persons & Reg 24	210	17%	25%
	841	69%	33%



Of the 841 Northamptonshire children who were living in foster care during this period, 261 children are placed with internal Mainstream foster carers (31%), 210 children placed with Connected person’s carers (25%) with this figure including those children living with carers granted temporary approval under REG 24.

Whilst this is positive, there remains a significant number of children (370) living with foster carers approved by independent fostering agencies (44%).

Anecdotally these children have tended to be older in age, sibling groups or children with additional needs. Finding fostering families for these children remains a priority and recruitment and marketing activity continues to focus on recruitment of foster carers able to offer homes to these children.

6. Recruitment and Assessment of Foster Carers

On March 31st 2023, there were 209 Mainstream fostering households, Connected Persons' fostering approved households and 'Regulation 24' temporarily approved fostering households.

Current Fostering Households	Data as of 1st April 2022	Apr -22	May -22	Jun -22	Jul -22	Aug -22	Sep -22	Oct -22	Nov -22	Dec -22	Jan -23	Feb -23	Mar -23	Total
Households on hold		1	1	1	3	3	2	4	4	5	6	4	5	
Positive ADM		0	2	2	0	3	0	3	2	3	2	0	2	19
Closed Households		0	-5	-4	-2	-2	-4	0	0	-1	-3	-2	0	-23
Count of Approved Households		213	213	210	208	206	207	203	206	208	210	209	207	209

18 new foster carer households were recruited, 16 less than the previous year. Anecdotally, this remains a positive position in an ever increasingly challenging market in which to recruit foster carers across the sector.

Across this reporting period, 13 fostering households have closed, with 3 of these being through the action of the Agency and 'Termination of Approval.' 10 of these have been through the carers change in circumstances and a decision to retire or resign from fostering altogether. There have been no instances within this reporting period where foster carers have chosen to resign from NCT's Fostering Service but chosen to continue their fostering career with another fostering agency.

Our net position at year end was -4 households.

The number of approved foster carers has not kept up with demand in the sector, which has had an increase of around 3% in the number of children coming into care over the last 12 months in Northamptonshire.

Below shows the number of enquiries, approvals and de-registrations (for reporting purposes, this the term used to include all foster carer closures for resignation, retirement and at the Fostering Service's instigation) over the last three years:

<p>Enquiries</p> <p>20/21: 397</p> <p>21/22: 252</p> <p>22/23: 170</p>	<p>Approvals</p> <p>20/21: 37</p> <p>21/22: 34</p> <p>22/23: 18</p>	<p>De-Registrations</p> <p>20/21: 29</p> <p>21/22: 32</p> <p>22/23: 13</p>
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Description	Mar-21	Mar-22	Mar -23
Number of Initial Enquiries received	397	252	175
Number of Initial Visits undertaken	145	85	72
Households invited to apply following positive visit	109	50	45
% of Households invited to apply from initial enquiries received	27%	20%	63%

From 1st April 2022 to 31st March 2023, we have:

- Received a total of 175 enquiries. This resulted in 72 initial visits (41%). Of these initial visits, 45 (63%) converted to a Registration of Interest (ROI), it is at this stage that Statutory Checks commence (Stage 1)
- This is a decrease of 77 enquiries for the same period in the previous year. Discussions in regional and national fostering recruitment groups have noted a continued drop in enquiries across the sector during this time period.
- The conversion rate from enquiry to approval of in-house foster carers is 10.5%. This is slightly less than the conversation rate achieved in 2021/2022 of 13%, though above the national of approximately 9% and the East Midlands region of around 6 - 7%.

In 2022/2023, 29 households withdrew from the assessment process (25 at stage 1, 4 at stage 2). The Fostering Service seeks to progress Stage 1 and Stage 2 of assessment of applicant foster carers concurrently which will mean that applicant households can be well progressed in Stage 2 of assessment before all of their Stage 1 checks are returned and reviewed as satisfactory. This does present a risk of late closures to assessment.

The stage 1 closed for the following reasons:

- A change of circumstances or change in family dynamics/work commitments meant that fostering was no longer viable/possible for them – this included 1 household needing to take on a caring responsibility for a relative, 4 where health needs changed within the assessment timeframe and 8 where fostering no longer fitted in with their lives due to job changes or changes in other personal circumstances.
- 1 household's immediate family members were not supportive of the application to foster and withdrew due to this.
- 7 stage 1 assessments were ceased by the Fostering Service: 5 noted that those applying were not suitable for the fostering role. 2 further households had major changes in their circumstances.

Of the stage 2 closures, 2 applicants were not suitable (one of these was a resilience applicant) and this was determined through late return of Stage 1 checks, and 2 had changes in their personal/family circumstances. Within this reporting period, the process for the review of applicants at Stage 1 has been undertaken.

Unavailable beds and Occupancy rate

We have seen a slight decrease this year in our unavailable beds (see table below) from 27% to 25%. During 2021 the reporting on unavailable beds was changed to align with Ofsted codes and descriptions. This has meant that the different reasons for beds not being able to be occupied is able to be reported more accurately. Foster Carers who are either placed 'on hold' by the Fostering Service (usually due to the carer being the subject of an allegation and investigation) or foster carers who place themselves 'on hold' at their request are regularly kept under review.

As detailed below, non-available beds are also kept under review, correct as of 31st March 2023:

This ensures that ensure maximum placement sufficiency is maintained. The vast majority of the 97 beds not available as detailed below arise from a foster carer having one bedroom but having terms of approval to care for one child or two if siblings. When a single child is placed in that bedroom, reporting details a 'lost' bedroom space which, in reality, was only available if the placement had been for two siblings who are able to safely share a bedroom.

Households on hold	5
Total number of approved places including exemptions	391
Filled Places	262
Occupancy rate	67%
Non available beds	97
Non available beds rate	25%
Vacant beds	16
Vacant beds rate	4%

Our Recruitment strategy and marketing campaigns

The Digital Marketing Specialist remains in post and supports all elements of our 'mainstream' recruitment activity, including to our specialist Resilience foster carer scheme.

A variety of marketing approaches are used including digital, social media channels, radio, as well as a range of outdoor engagement to promote fostering for Northamptonshire Children's Trust. The Lead Member and chair of the Corporate Parenting Board along with staff and foster carers within the organisation remain very supportive in promoting fostering within their networks.

We have an Annual Fostering Communications and Marketing Plan that has had input from the whole of the Fostering Service and offers a breakdown of digital marketing strategies, community-based activities, printed marketing, and the budget allocated to each of these. Different types of fostering are planned to be promoted on various weeks throughout the year. The duration and amount of advertising planned for each scheme is based on the sufficiency needs identified by the Independent Fostering Agency and analysis of referrals for children's placements received into the team. *Please see the separate Marketing and Recruitment Activity report.*

The Fostering Service continues to employ the talents of a specialist Digital Marketing Recruitment Specialist to support with:

- Recruitment Campaigns
- Targeted activity across the year to raise the Fostering Service's profile to include the use of
 - Facebook
 - Twitter
 - Google Ads
 - LinkedIn
 - Social Media campaigns
 - Dedicated NCT Fostering Service webpage
 - Partnership working with other Local Authorities
 - Exploring partnerships with other local companies
 - 'Face to Face' and engagement activity locally across Northamptonshire.
 - Event planning

Brand

This year, we wanted to create a 'brand' and a uniformed look, so each type of fostering had their own tag line under the 'step up' brand.

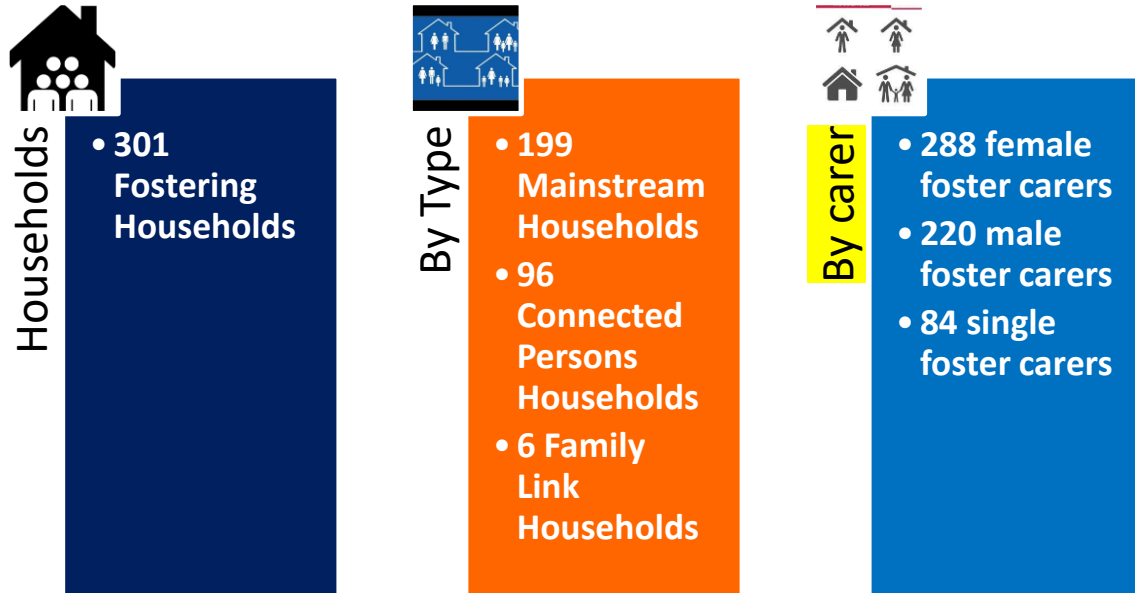
- Mainstream – Step up and make a difference
- Siblings – Help us to take steps together
- Emergency – Could you step in when I need you
- Resilience – Help us take steps into adulthood
- Parent and child – Supporting both big and little steps
- Family Link – Could you step in and support our family

2022/23 advertising examples



7. Post Approval Support and Supervision

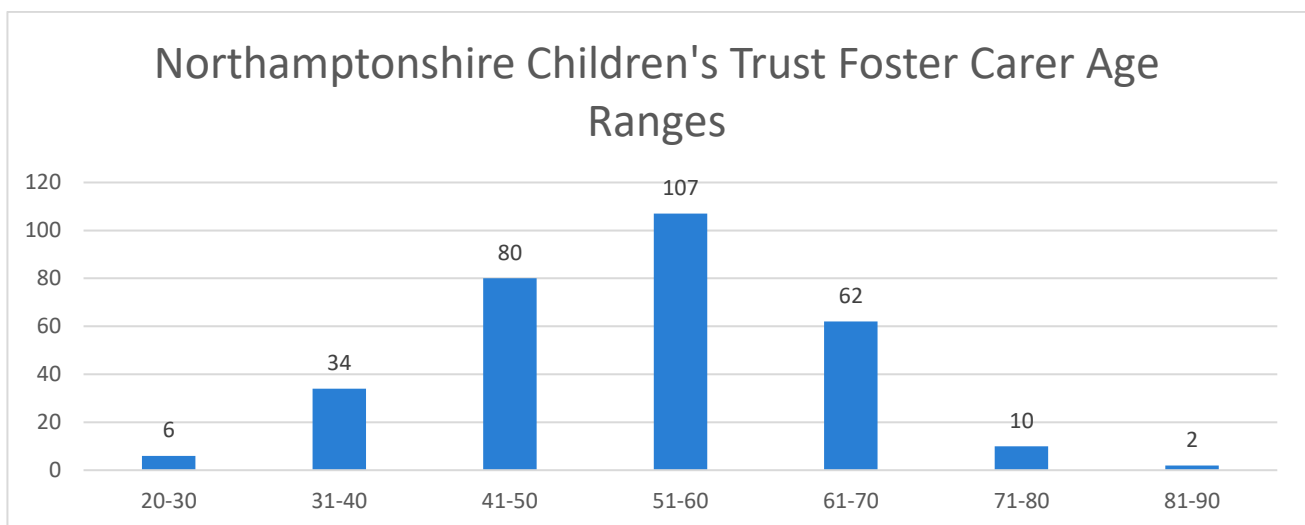
As of 31st March 2023, we had:



Single-carer households accounted for less than one third (28%) of all households.

Our foster carers come from a wide range of age groups, with our youngest carers aged between **20-30** and our oldest carers aged between **81-90**.

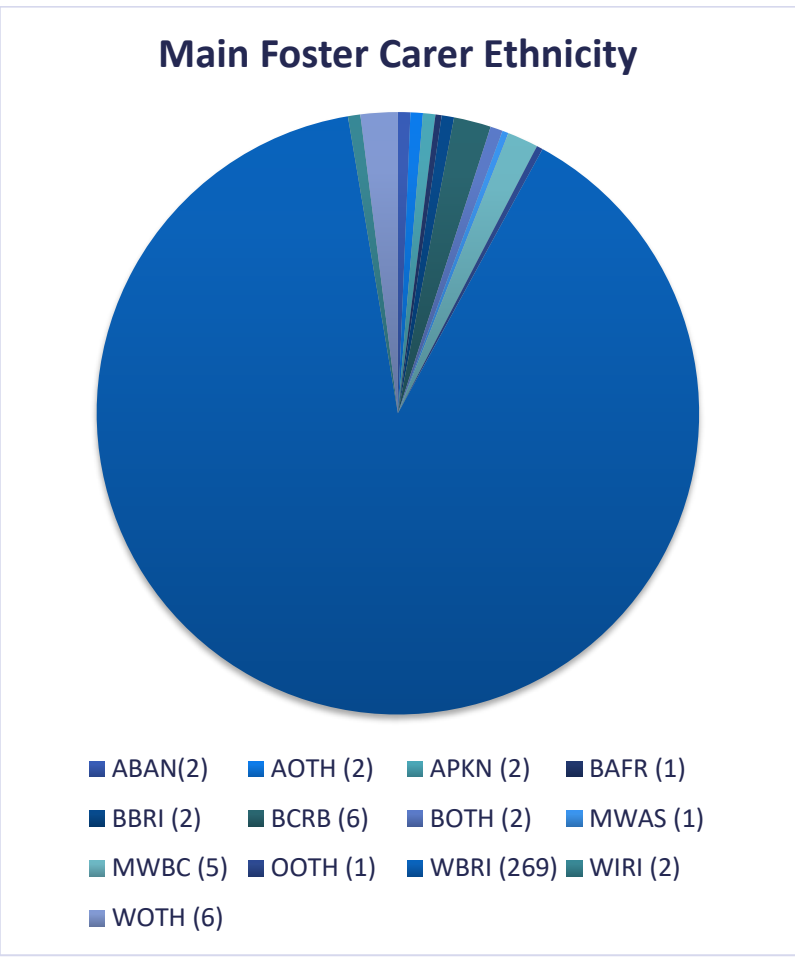
Most of our foster carers are aged between **51-60 (36%)**. This is slightly below national figures (**40%**).



Our foster carers come from a wide range of different cultural and ethnic backgrounds including:

- Bangladeshi
- Indian
- Pakistani
- African
- African Caribbean
- Chinese
- Irish
- Black British
- White British
- Asian British
- White European

and foster carers from mixed heritage backgrounds. Most of our foster carers identified as White British.



On 31 March 2023, in line with previous years, most foster carers were White British (89%). This also correlates with the overall demographic of our looked after population also being White British. This means that we are predominantly able to place child in households where their cultural and heritage identity are met and where we may have placed children with foster carers of a different cultural ethnicity and heritage to themselves, we have considered what other support, such as additional training or access to specialist hair or skin care, can be put in place for both the children and their foster carers in this scenario.

There are 8 Households with same sex Foster Carers.

The average time our Foster Carers have been with us is 6 years 1 months.
The current longest serving Foster Carer has been with us for 42 years and 4 months

NCT’s Independent Fostering Service continues to ensure this is consistently achieved, and we continue to evolve better ways of monitoring compliance with policies and procedures in supervision and performance meetings and audit and dip sample activity.

We track and monitor themes and patterns arising from Fostering Panels, with specific actions arising from any consistent areas for development through our panel chair meetings.

The performance of the service is also monitored by Ofsted inspections, the Corporate Parenting Board, the Sufficiency Board, the Children's Trust Board and the senior leadership team. The Fostering Service were subject to an ILACS Inspection across the whole of NCT's Children's Services undertaken in November 2022 and then a full five day SCCIF Inspection of the Fostering Service only in February 2023.

The performance indicator system initially established in February 2022 continues to be reviewed and refined to ensure that we have management oversight on all our fostering files and is now more sophisticated in the data we can hold and correlate. This supports foster carers receiving regular supervision and that their annual reviews remain on time, unannounced visits, DBS, medicals are up to date. This also measures if the child has been seen and if their bedroom has been checked. All of the regulatory compliance functions are now supported by practice guidance and policy updates to support a congruent approach to social worker practice within the Fostering Service. This has been a significant focus of the work undertaken within this reporting period and remains so moving forward. This remains a continued area of focus of development and improvement for the Fostering Service.

A new induction programme is being introduced this year which will be reviewed with the input from a group of foster carers to ensure that our Independent Fostering Agency reflects our new carers' journey to being able to care for their first child.

Since last year we have started to co-work cases between the Recruitment Team and Post Approval Team. This ensures a smooth handover and more of a managed induction to fostering for many of our newly approved foster carers, with the recruitment workers having been involved with initial matching discussions and supporting with first placements. There has been positive feedback regarding this arrangement.

As we are currently reviewing our existing induction programme, this remains in development and will be in the form of interactive online information covering the following areas:

- Role of SSW and what to expect in supervision.
- Role of Fostering Duty.
- What to expect in the first duty phone call.
- What to expect and to request in a Placement Planning Meeting.
- Expectations of Training, Continuing Professional Development, TSD and Annual Review.
- Introduction to the NFCA.

This will not replace the co-working arrangements currently in place and remain the usual practice.

Support groups

The following support groups are established within the county and are based around localities. They are free for foster carers to attend. The Registered Manager has visited each of the support groups below between September 2022 and December 2022.

Locality/Group Name	Meeting Frequency	Description/notes
Corby Support Group	Monthly	Locality support group for the Corby and surrounding areas. Has been successfully piloted as a training hub.

Kettering Support Group	Monthly	Locality support group for the Kettering and surrounding areas
Rushden/Wellingborough area	Monthly	Covers Rushden/Wellingborough as well as Irthlingborough and wider area
Northampton Support Group	Monthly	Northampton based group
South Northamptonshire Support Group	Monthly	Covers geographic area of West Northants below Northampton
Family Link Support Group	Monthly	Support group for Family Link Short Breaks carers
Northamptonshire Foster Carers Association (NFCA)	Monthly	Established Foster Carer Association
Male Foster Carer Support Group (countywide)	Monthly	Based in Rushden, male carer support group.
Special Guardians and Kinship Support Group (Countywide)	Monthly	County wide group.
BAME foster carer support group	Quarterly	Newly established support group in March 2023.
Karing Kids (County wide)	Special events throughout the year	For birth children of foster carers
Children with Disabilities Support Group	Quarterly	Based at the Penrith Centre
Single Carer Support Group	Quarterly	Based at the Penrith Centre
Separated Children's Support Group	Quarterly	Based at the Penrith Centre
LGBTQIA+ Support Group	Quarterly	Based at the Penrith Centre
BAME Support Group	Quarterly	Based at the Penrith Centre
Foster Carer Buddy Support Group	Quarterly	Group in development to support the existing Buddy Scheme.

Other support in place

"Share the Care" E Newsletter

This goes out to all carer households every two months via email and includes corporate and carer information. There are contributions from foster carers, staff and senior leaders, and also includes positive news stories about children.

"We see J monthly for supervision but know that she is contactable in between those times if we needed her. She is responsive to any requests or concerns we may have. She makes sure that she sees our foster and own children too."

NCT Foster Carers

"We now have been allocated S and she has been amazing at getting to know both myself and J as well as the children. We look forward to working with her on our journey as foster parents."

NCT Foster Carers

"A particularly found his candid discussions with SSW. A to be useful, using her as a sounding board and having realistic expectations for the nature of placements. We have also found the recruitment team to be particularly helpful in getting us back in the loop and ready for our first annual review following a long break from fostering.

NCT Foster Carers

"Taking on K was something new for us, K came with some behaviours that could be difficult to manage at times and so we had to look at different ways to help her, make the world a calm and safe place for her, but also showing her boundaries. We took advice from doctors and our health visitor as well as our SSW who were all great helping and supporting us throughout K's time with us"

NCT Foster Carers

Whilst approval of new foster carers is a priority, we recognise that work needs to be undertaken to ensure that we are effectively using the fostering resources available within fostering households already approved.

This has included reviewing and supporting foster carers who have been 'on hold' to see whether they can return to caring for children and the introduction of a clear process for foster carers who are requesting to be put on hold with guidelines around timescales, staying in contact, support and training needs during this period and return to fostering (including need for review).

In the last month of this reporting period (March 23) two families felt able to return to fostering after being contacted and visited.

This review allowed us to get a clearer view of our actual capacity as well as supporting those carers who might struggle to continue their fostering journey.

Where appropriate, we support changing foster carers approval where they have space in their home to care for additional children, and this resulted in 3 additional beds through a permanent change of approval and 12 additional beds on variation of approval for limited time.

Public Health Project

Supported by Public Health for 2 years from October 2020-22, the Fostering Support Fund increases the support for in-house Foster Families with foster children aged 5-12. The project focuses on the development of in-house skills and commissioning therapeutic interventions for children and carers, with the aim of improving mental health outcomes for children and to improve placement stability. Since the start of the project, we have supported over 80 foster children/families/care experienced young adults with individual therapeutic interventions, with real improvements to their mental health, wellbeing and resilience.

Within this reporting period, these supervising social workers have now received the DDP Level 2 training to support and embed their learning of this approach. Additionally, a senior Supervising Social worker role has been created to lead on Therapeutic approach and to act as an ambassador for the whole Fostering Service, who is responsible for ensuring that all new relevant research is cascaded down to the service. Additionally, this dedicated worker will continue to expand supervising social workers own 'toolbox' with strategies and responses they can offer to foster carers to develop and employ within their work with children. Foster Carers

have access to the clinical psychologist for consultations and complex case supervisions bi-monthly which has been reported as being beneficial and supportive by foster carers. The staff team's knowledge base of therapeutic parenting and approaches has increased significantly due to all of the above.

Resources available through this scheme are:

- All foster carers can access the National Association for Therapeutic Parenting
- Clinical Psychologist offering consultations to carers
- DDP training for SSWs which will be introduced at support groups

Below is an overview of the support offered by this scheme to date:

Group Work Therapeutic Parenting

Non-Violent Resistance

Therapeutic Parenting

Thera play

Therapeutic Stories

Therapeutic Life Story Work including Carer

Resilience carers

This scheme is to meet demands for a specific cohort of children aged 10+, who are at risk of being placed in (out of county) residential homes due to their complexities and difficulties in finding family placements. Resilience foster carers have a team around the child including therapeutic training and support. The residential sector supports the placement and social workers. We are working closely with a local psychologist service, Broad Horizons, who have developed bespoke training for these foster carers to address key challenges in caring for this cohort of children. Clinical supervision is part of their offer to staff and foster carers.

We set out to have 10 Resilience scheme households by the end of March 2023 which would have enabled a further 6 children to be stepped down from residential care. Within this reporting period, we have achieved 7 households with 5 children in placement as of March 2023, with two other Resilience carers significantly progressed in assessment at this time.

Training Offer for Resilience Carers

Please see separate annual Training Report, with the highlights from this being:

Before attending fostering panel there is an expectation that carers must complete the Specialist Foster Caring Training Programme presented by Broad Horizons.

The training further develops skills in relation to the understanding of the emotional and traumatic experiences of children and young people in placements that have been identified as having complex needs.

On completion of that training and clinical supervision, the foster carer achieves a certificate in Specialist Foster Care.

Broad Horizons exclusive DART model is tailored to meet the learning needs for each individual to become a specialist foster carer.

The core principals focus on:

Dissociation

Attachment

Resilience

Trauma

Family Link/Short Break Care for Children with Disability

Family Link gives disabled children in Northamptonshire the chance to spend time with another family to give their family a break. This could be for an afternoon or a few days.

There were 7 family link foster carer households at the end of March 23 which is 2 less than the previous year. During the year 2022/23 we did not approve any new households. Further work is currently being undertaken to ascertain how many families we need going forward which is one of the priority areas in our recruitment strategy.

The Family Link carers are supported by two dedicated Supervising Social Workers from within the Fostering Service who lead on this support alongside their respective allocated fostering households. This ensures that a 'joined up approach' to the support that our Family Link foster carers receive.

Parent and Child Placements

We currently only have one approved foster carer households who is able to offer 'Parent and Child' placements. There remains an area of focus for the Independent Fostering Agency within the forthcoming reporting period, A targeted workshop was delivered to the supervising social worker cohort to support a wider understanding of the specialist support required for 'Parent and Child' foster carers at the whole Service Development Day held in March 2023. This was delivered by our specialist 'Parent and Child' foster carer.

These placements have offered opportunities for parents to care for their children and whilst neither led to children and their parents successfully returning to the community. The foster carers have been supportive in transitioning the children to their permanent carers when it became evident that their parents were not in a position to offer the consistent, nurturing care for the duration of their childhoods.

8. Connected Persons and foster carers granted temporary approval under Regulation 24

Connected Persons Foster Carers and Special Guardians

The Connected Persons Team undertakes assessments of people who are connected in some way to children being supported by the Trust. These assessments are typically of family members but may also include those who are connected to the children in other ways for example, trusted friends of the family, other professionals supporting the children including teachers and others who have a meaningful relationship with the children and who are able to evidence a commitment to supporting the children to maintain family relationships into the long term.

Assessments usually consider applicants to be the long-term carers of the children as either Foster Carers or, increasingly, as Special Guardians. Indeed, over the period of this annual review there has been far more emphasis on supporting prospective Connected Persons to become Special Guardians and to this end an SGO training package has been provided to social workers across the Trust and to Connected Persons which helps them to make more informed decisions about the opportunities that Special Guardianship conveys as opposed to fostering.

In terms of trends for the Connected Persons Team there has been a levelling off of the number of family and friends' assessments being undertaken this year compared to last year. This is mainly due to the development, through training, through the sharing of updated policies and procedures and through greater co-working, of better understanding across the Trust of the requirements of fostering as specified within Fostering Regulations and National Minimum Standards. This enhanced understanding has meant that referring agencies are better informed when making referrals to the Connected Persons Team and considering other options for children in terms of permanence.

In 2022 - 2023, there were 217 referrals into the team which is a reduction from the figure of 254 in 2021 - 2022. This reduction is mainly explained because of improvements in the screening process which has meant that a higher number of initial referrals have not progressed beyond this stage as they were identified as not meeting the requirements of Fostering Regulations and National Minimum Standards.

Furthermore, in terms of Connected Persons being approved by the Agency Decision Maker there were 4 more approved Connected Persons carers at the end of March 2023 as compared to the previous year, 34 in total. Additionally, 35 other households undergoing assessment were closed prior to the assessment being completed for reasons including placements no longer being required, applicants withdrawing and children being returned to their parents following positive parenting assessments.

The specific challenges for our Connected Persons foster carers and Special Guardians are fully recognised within the Fostering Service and to this effect a specific Kinship support offer has been developed this year for approved Connected Persons carers and those undergoing assessment. This offer includes a quarterly Kinship coffee morning which gives carers the opportunity to meet other carers and members of the team on an informal basis to both catch up on current developments as well as to take the opportunity to meet current and new carers to share their experiences of the assessment process and the opportunities and challenges that go side by side with being Connected Persons.

Most recently a Special Guardianship group has been set up specifically focussed on Special Guardians. This is in its infancy but is already beginning to bear fruit with an Open Day event for all Special Guardians being planned for later in 2023.

There are also more formal meetings with the Northamptonshire Foster Carers Association which are for all foster carers whether Connected Persons or Mainstream and which are regularly attended by Connected Persons carers.

In terms of the support to families and children going through the assessment process the Connected Persons Team continues to provide high levels of support and training as it has always done. The Connected Persons Induction training programme has been improved and built on in that there is now an IT based training programme that sits alongside the face-to-face programme, which enables applicants undergoing assessment who aren't able to attend face-to-face training to access the same training provision.

Furthermore, as already alluded to an SGO specific training programme has also been developed and currently 6 face-to-face sessions have taken place with social workers from across the Trust and with prospective Special Guardians. It is expected that this provision will support more applicants to become Special Guardians thus supporting families and children to move on in their lives without the need for ongoing Children's Services input. However, this does not mean that further support is not available as, if requested, the Post Adoption and SGO Support team provides a range of support to those Special Guardians who identify a need post order.

9. Involving our Foster Carers

Our vision is to work as one team together with children and their foster carers at the centre of that team.



We aim to work in partnership with our foster carers and are facilitating opportunities for them to share their views and influence service developments. Plans to achieve this include the development of task groups which offer opportunities for co-production between the Fostering Service, foster carers, our children and young people.

Managers, including NCT Chief Executive Officer, meet regularly with the Northamptonshire Foster Care

Association and foster carers are actively involved in recruitment activities. Additionally, any new process or change in process is also shared at the monthly IFA/NFCA Forums to which all of our foster carers are invited and a diary of dates for these meetings have already been shared with all of our foster carers through until the end of the year. These monthly meetings have been in place since July 2022. Managers from within the Fostering Service attend the NFCA committee meetings held on a monthly basis which is a further opportunity to share any changes to policy and practice. The NFCA committee members then further disseminate this information through the area foster carer support groups offered across the county on a monthly basis.

In January, a joint Child in Care (CIC), NFCA and IFA Forum was established to meet quarterly to support the development of relationships with our foster carers with both the Fostering Service and the CIC teams. This

has been well received and is progressing the development of both the new Savings policy for Northamptonshire children in foster care and a joint children's social worker and supervising social worker visiting policy, to ensure the 'Team around the Child' approach is maintained.

Moving forward in partnership with Northamptonshire Foster Carer Association we intend to work together to further develop a support group programme and events for the year ahead.

As referenced elsewhere within this report, the NFCA continue to deliver support groups across Northamptonshire on behalf of the Fostering Service and within this reporting period, the SLA has been reviewed in this regard.

A bi - monthly magazine, 'Share the Care', continues to be prepared and shared with all foster carers to share information, updates, and good news stories in respect of the Fostering Service and foster carers report that this is really helpful in receiving all updates in one place.

One of our Foster carers attends Corporate Parenting Board and takes an active part in contributing to service development through this forum.

10. Involving our children

Foster children and birth children are encouraged to provide feedback for their foster families' annual review and it is positive to see that feedback was received from looked after children and young people in 83 % of household reviews, which is a decrease from 94 % last year, and from birth children in 93 % of household reviews, which again is a slight decrease on 98% from last year. Most children report to be happy and settled in the families they live with. Where a child might express concerns, this feedback enables us to respond in a timely manner.

Celebrating the successes and achievements of children in our foster families is an important part of what we do and foster carers and supervising social workers present these to managers within NCT and the IFA.

Young People who are currently in care or are care experienced young people are supported by the fostering service to lead a workshop during the 3-day preparation training for potential foster carers. This is enjoyed by participants and also allows the young people to assess how the participants naturally relate to them. They then provide feedback regarding the applicant's suitability to foster.

A children in care consultation group is planned for this forthcoming reporting period, with a dedicated survey to be undertaken with our children and young people placed within our in-house foster carers to help inform and shape the delivery of our Fostering Service for our children and to ensure that the child's voice is heard through our service development.

'Karing Kids' support group has been ongoing for a number of years in Northamptonshire in recognition of the key role that birth children play in fostering households and to thank them for their



contribution to fostering. One of the aims of this group is to support with the retention of foster carers and improve the stability of our children in care placements. In November 2022, we held a 'Karing Kids' competition to design a logo. We have used the winning entries to create a pull up banner to be used at our recruitment events and 'Skills to Foster' training to support applicant foster carers gain an understanding of our support offer to their own birth children.

We are rightly proud of all our children, and we will continue to capture and celebrate all they do and their successes.

Children and young people's views are integral to the fostering service.

Positive feedback is celebrated, and any worries children and young people raise about their care are taken seriously and addressed with the foster carers and where necessary in line with the complaints policy.

Children in fostering families are also consulted as part of the foster carer annual review. Children's lived experiences are explored in support and foster carer supervision.

11. Learning and Development

Foster Carer Training Programme

Please see the annual training report.

NCT's Fostering Service offers a comprehensive online and 'face to face' training offer to our foster carers. This is kept under regular review and supports the mandatory training requirements for our foster carers. An annual survey is undertaken each year to garner feedback from our foster carers as to the value of the training made available to them as well as individual feedback and reflection forms that are completed at the end of each training by the foster carers. Additionally, within the Annual Review process, foster carer are always asked to provide as to the feedback as to the quality of the training that has been made available to them. This ensures that the training offer remains of a good standard and meets the varied learning needs of all our cohort of foster carers.

A Foster Carer learning, and development programme is produced annually. All Foster Carers have their own eLearning accounts through which they can access training online. Feedback on each course is requested from attendees and tells us that foster carers are finding the available courses informative and of value. A personal development plan for each individual foster carer has been introduced which is discussed and reviewed in supervisions to measure impact of learning and how this is supporting the child in placement.

As an action of the SCCIF inspection undertaken in February, a mandatory training requirement policy for foster carers has been reviewed and updated. Foster carers had been written to and a specific tracker put in place to record progress made against this. This includes the following requirements:

All foster carers seeking approval with NCT's Fostering Service must complete the following mandatory training courses within initial assessment:

- First Aid
- Skills to Foster' for mainstream foster carer applicants
- Connected Persons Induction for kinship foster carer applicants
- Online Safety
- Basic Safeguarding- to include Virtual Reality
- Health and Safety for foster Carers – An introduction
- Safeguarding Children for Foster Carers and Adopters only

Within the first twelve months of approval, all foster carers must also complete:

- Signs of Safety 1 day Introduction

Additionally, each approved foster carer (i.e. both foster carers where a two carer household) must complete one of the following safeguarding courses within each review period (i.e. annually as an absolute minimum). This needs to be only one of the courses detailed below:

'Face to Face' safeguarding training offer

Keeping Children and Young People Safe Online for Foster Carers and Adopters - Webinar

Bitesize Gangs and Knife Crime for Foster Carers and Adopters only

Safeguarding Children for Foster Carers and Adopters only

Keeping children and pets safe in the home - Webinar

E-Learning safeguarding training offer

Contextual Safeguarding

Female Genital Mutilation

Introduction to Safeguarding

Peer on Peer abuse

Radicalisation

Children and Young People who Run Away or Go Missing

County Lines

Gangs, Guns and Knives

Child Trafficking

Digital and Internet-Supported Self-Harm

Harmful Sexual Behaviours

Child Sexual Exploitation

Online Safety and Cyberbullying

Pornography and the Potential Impact on Young People

Social Media, Selfies and Sexting

The identified safeguarding course to be completed in the forthcoming review period must be included within the foster carers' individual PDP as part of each Annual Review.

Additionally, within each three year period following initial approval, all foster carers must renew the following mandatory training:

- Safeguarding Children for Foster Carers and Adopters only
- First Aid Training

A Foster Carer learning, and development programme is produced annually. All Foster Carers have their own eLearning accounts through which they can access training online.

NCT offer both face-to-face and online delivery as we recognise that the needs of our foster carers vary according to the they care they provide, with our face-to-face training offer being significantly increased over this last year.

Face-to-Face Training	E Learning
Within our current training offer we have over 56 face-to-face courses which are offered throughout the year. They are bookable and the offer can be viewed online.	We have over 70 courses available via E Learning. The courses range from knife crime, drug and alcohol awareness to court skills, healing environments and positive parenting techniques.
186 face-to-face courses delivered	780 E Learning units have been allocated and fully completed.
1475 attendees booked onto the courses and fully completed them.	

In addition to the Skills to Foster Training and a number of face-to-face and e-learning courses, the Recruitment team continues to be accredited in using Virtual Reality (VR) training. This is a tool we use within every assessment for prospective foster carers. It allows applicants to experience abuse and neglect from a child's perspective, as well as understanding the impact of trauma and how certain stimulus can trigger a trauma response in a child or young person. This resource has been used to great effect within assessment and has provided strong evidence of how applicants will be able to support a child or young person in a more therapeutic manner once approved as a foster carer.

Training	Feedback
Critical thinking in assessment	<i>Great course, well delivered learnt a lot how to put critical thinking into practice</i>
Working With Anxiety	<i>This was an online webinar presented by Jessica van Maanen. It was a very good overview of the topic giving a good balance of theory followed by practical examples of how to help reduce anxiety in the children we are caring for. There was balance between the use of the PowerPoint slides and talking through the topics in such a way as to keep them interesting. I was particularly pleased that we were given references to some of the materials used so that there is an opportunity to go deeper into some of the ideas presented.</i>
Working With Anxiety - Webinar	<i>I was pleasantly surprised how engaging this training was. We have been promised a copy of the Power Point. I have already been reading more by Dan Seigel as a result of this webinar.</i>
Keeping children and pets safe in the home	<i>Useful training and relevant to our role</i>
Keeping Children and Young People Safe Online for Foster Carers and Adopters - Webinar	<i>Our trainer was excellent and one of the most engaging and knowledgeable trainers we have had on our journey. Thank you so much for making a difficult subject informative and effective!</i>
Working with Anxiety	<i>Very informative and the trainer was excellent in the way she delivered the course. She was very calm and kept me focused and interested.</i>
Critical thinking in assessment	<i>Great course, well delivered learnt a lot how to put critical thinking into practice</i>

More recent discussions with Foster Carers have shown that they would prefer more local training and we have successfully piloted some training at one of our local groups for foster carers in the Corby area which was very well received. Training and contact hub lets have been established in Local and Independent Libraries across Northamptonshire within this reporting period and have been very well received.

In addition to the formal 'classroom' training, Foster Carers have access to a wide range of resources to support them to develop which are available through the online subscription platforms - Research in Practice and Fostering Network, Coram BAAF.

Although it is improving, training compliance remains a challenge for the service and a Fostering Training review has produced a draft proposal to renew the training programme for foster carers and improve compliance with training.

Foster carers are supported in completing the Training, Support and Development (TSD) workbooks as well as Advanced Level portfolios. Completion of these documents is linked to carer development and progression, which supports carer retention.

12. Placement Stability

The percentage of children who have lived in the same placement for 2+ years has remained strong (66%) and this tells that most children are appropriately placed in homes that are meeting their needs.

We continue to see an increase in requests for children to become cared for and this, combined with the challenges experienced both locally and nationally in identifying suitable carers who can meet children's complex needs, has contributed to the reduction in short term placement stability. The use of emergency carers has increased and, whilst offering a place of safety to children and young people, they experience a change of carer within a short space of time. Work continues to be undertaken to scrutinise new placement requests with a focus on supporting foster carers to continue caring for children at times when instability is experienced and ensure support for challenges faced within the foster home.

Monthly sufficiency board meetings continue to take place with colleagues in NCT to assess what is needed to improve stability for all looked after children and to ensure that all children receive the support they need.

The aspiration is for all children to live within stable and nurturing homes for the duration of their childhoods. Focus is on provision of support to prevent likelihood of placement breakdown and includes developing skills, knowledge and resilience of foster carers through the public health funded fostering support project, use of placement stability meetings, and greater involvement of birth families through progressive contact arrangements. Further work is planned within this forthcoming year to better cement robust processes in respect of the reporting and recording of placement stability meetings and to ensure that learning is then taken forward and cascaded through the Fostering Service, to support the stability of children's fostering placements more widely.

We are seeing a positive impact of the completion of the Initial Matching referral document at the point a child is initially matched with a carer and the individual Safe Care Plans in which the child's needs are highlighted. These plans are being linked to foster carer's own Personal Development Plans. This is starting to enable the carers and supervising social workers to ensure the training plan is around the child and the

needs of the Fostering household. This remains an area of continued development and focus within the Fostering Service.

The Independent Fostering Agency continue to have a Clinical Psychologist role embedded through the Public Health project which focusses on the outcomes for children in our foster families through placement stability.

The Psychologist has developed a training plan for staff which include: DDP & PACE, Adverse Childhood Experiences', coping with change, Restoring Resilience, Emotional Regulation, Self-Reflection (tree of life), Managing difficult conversations, Therapeutic Stories, Blocked Care.

The cohort of SSWs, Practice Managers and Team Managers who attended DDP (Part 1) last year, have been offered DDP (part 2) training within this reporting period and this has further embedded their understanding of therapeutic practices and the wide learning across the fostering service. This enhances the support offer available to our foster carers and children.

Monthly drop-in sessions for staff to discuss possible referrals to panel and seek advice are in place and continued to be well attended. The reasons for attending the drop-in sessions have included: to ask for clinical advice around complex cases; to ask for advice around placements at risk of disruption; to ask for advice around how to meet the mental health needs of children and foster carers.

Permanency has been achieved for 8 children where long term matches between child and foster carer have been presented to panel this year, an increase on 6 children from the previous year. This number is still lower than we expect, given the number of children in long term placements who have not yet been officially matched. The Fostering Service are committed to working in partnership with NCT's children's teams to progress permanence matching for children in a timely manner and the Fostering Service Manager now sits on the Permanence Tracking Panels that are held twice monthly, once in the West and once in the North of the county, since September 2022 to support the early identification of permanency planning for children and to maintain the timely progression of these plans. It is therefore anticipated that within the forthcoming year, the numbers of children who become permanently matched with their foster carers will increase significantly.

13. Fostering Panel

Please see annual Panel Report.

Northamptonshire Children's Trust Fostering Panel continues to have a significant role in maintaining quality services for children in care. The recommendations that panel make will always be based on providing a stable, secure, restorative and therapeutic living environment for children in care. The independent Fostering Panel and decision maker make timely, qualitative, and appropriate recommendations and decisions in line with the overriding objective to promote the welfare of children in foster care.

Fostering Panel provides an important Quality Assurance function to the Fostering Service. This year a total of 115 cases (74.68%) were rated as excellent or good. This is a decrease of 5.62% from the previous year with satisfactory and inadequate reports rising by 7.36%. Quality Assurance is discussed at the regular Joint Chairs and Team Managers Meeting. Additionally, the Registered Manager has observed a total of four Fostering Panels (both virtually and 'face to face' and across a mixture of Panel A and Panel B) since coming

into post in late June to support the Quality Assurance function of her role and the delivery of Fostering Panel. The Fostering Service meets quarterly with panel chairs and panel members are also invited to participate in Independent Fostering Agency -learning events. Bespoke panel training is provided twice yearly, in May and November.

In November, Fostering Panels moved from being held fully virtually to being held virtually and 'face to face' on alternating weekly basis; there are therefore now two monthly virtual Panels and two 'face to face'. The transition to this new arrangement has worked successfully with positive feedback from applicants, carers and social workers. To continue to improve the experience of fostering panel for applicants, approved foster carers and professionals, feedback is sought after attendance at panel.

Panel feedback

"I found panel to be a very positive experience. This was the first face to face panel in a very long time and I was worried it would feel overwhelming, however it was quite the opposite. As always panel was well structured, and I found the questions for the applicant to be appropriate. The carer was given sufficient time to respond and was listened to. Every member on panel had a lovely smiley face which is very reassuring and puts people at ease."

"I felt Panel were excellent today. This was a complex assessment, but all questions were sensitive and supportive. I really got a sense that Panel were delighted to recommend such a positive outcome for both children in this case."

"I have enjoyed attending both types of panels. I usually find that new applicants prefer virtual as they prefer the comfort of their own home and do not feel as nervous. However today the applicants enjoyed meeting face to face as they had fostered before and felt it was more personable. This was my first face to face panel since the pandemic and it was nice to meet everyone, and I felt the panel experience overall was very positive."

"The panel members themselves were very welcoming and friendly to me and the applicants.

Appropriate questions were asked, and panel identified key strengths that were highlighted in the assessment.

I was also given positive feedback on the report and how previous information had been incorporated, which was valuable."

"We had what felt like a very honest meeting reviewing our unorthodox first year of fostering. Our professional and personal challenges were met with understanding and respect, while taking practical perspectives on how to move forward. We both felt that the panel were very supportive and encouraging, empowering us as foster parents despite our setbacks. The questions covered reassure us that we have answers where attention is needed and incite further consideration to how we can improve.

Our needs and requirements were well considered, to make sure that we are fully equipped and able to undertake the role to the best of our ability."

"We were happy with the panel process and welcomed the questions from the panel. We appreciated the way we were told that we'd be recommended to be approved at the time of panel and the individual panel members reasons and comments made it feel more personal even though it was via TEAMS."

"Thanks very much for making me feel at ease. The general introductions helped to relax and put me at ease along with the questions which were put across in a straightforward manner."

Application	Numbers
Mainstream Assessments	18
Connected Person Assessments	42
1st Reviews	59
Change of Approval	9
Other Reviews	14
Match - In-House	2
Match - Agency	6
Termination of Approval	3
Extension of Reg 24 Placement	26
Representations	0
Closures	61 (to include mainstream and connected person's foster carers)
Short Report: Connected Persons	3

14. Complaints

There were 4 complaints made by foster carers between April 1st 2022 and March 31st 2023:

- Two complaints were made by carers in response to delays in agreed building works being progressed to provide an extension to the carers' property to support the fostering task. This building work is now progressed in one case and cannot be progressed in another due to the property being Housing Association owed and agreement not being given for the work to be carried out.
- One complaint related to the fact that the children's social worker had arranged to visit the two children in placement at school against the foster carers' wishes. This was predominantly a complaint against the allocated children's social worker but did also consider the fact that the SSW had supported this visit.
- One complaint was received by a foster carer subject to an ongoing investigation following several disclosures being made by a child and the fact that the other child in placement, the sibling of the child who has made the disclosures, has not been allowed to return to her care.

The theme this year was that complaints received were about foster carers experiencing a lack of support from NCT, but not necessarily directly the Fostering Service.

Three of the complaints were partially upheld but not solely against the Fostering Service but NCT more widely and one complaint cannot be concluded until the outcome of the investigation is known. Following all complaint investigations and response, recommendations made focussed mainly on a need for improving communication and timeliness in responding to concerns before they escalate in an official complaint.

Learning from these complaints is cascaded through team meetings. Peer reflective sessions will be introduced in the coming months to understand themes from complaints and collaborative reflective practice discussions (CRPDs/case audits).

Within this reporting period, there were 13 complaints made by children:

- One related to a child who complained about the home conditions, the way the foster carers' managed the behaviour of the other young people in placement and the foster carers' dogs whilst staying in a respite placement.
- One was made on behalf of a child via their school as he had become very worried that he would be 'told off' by his foster carer when he accidentally spilt paint on his jumper in an art class.
- One related to a child alleging that the male foster carer had hit his own children.
- One child complaint that the Foster carer had, when checking the child's phone found a picture where the top part of her body did not have clothing on. The female carer had taken a picture of this image and the child stated that this picture was sent in a text message to an adult ex foster Child aged (31) who subsequently showed the child the picture. The carer has apologised to the child and said the picture had been sent via a text message in error.
- One young person raised concerns with her social worker and her birth mother about her previous foster carer who had resigned.
- Four related to children being upset by comments their foster carers had allegedly made about their birth families.
- One related to a foster carer damaging their property (PlayStation game).
- One was made on behalf of a child via their school as to his 'unkempt' appearance.
- Two related to foster carers hurting a child: One when the birth parents of a teenage child complained that he had sustained a small bruise to his chest when the carer took him out of his seat in the car to separate him when he started fighting with his sibling in transit and one of pulling hair when the foster carer went to stop a child from hurting herself and causing damage with a hairbrush.

The Fostering Service has managed all these complaints made by children or young people against their foster carers during this reporting period through the Schedule 7 notification process. LADO consultation was sought on each occasion.

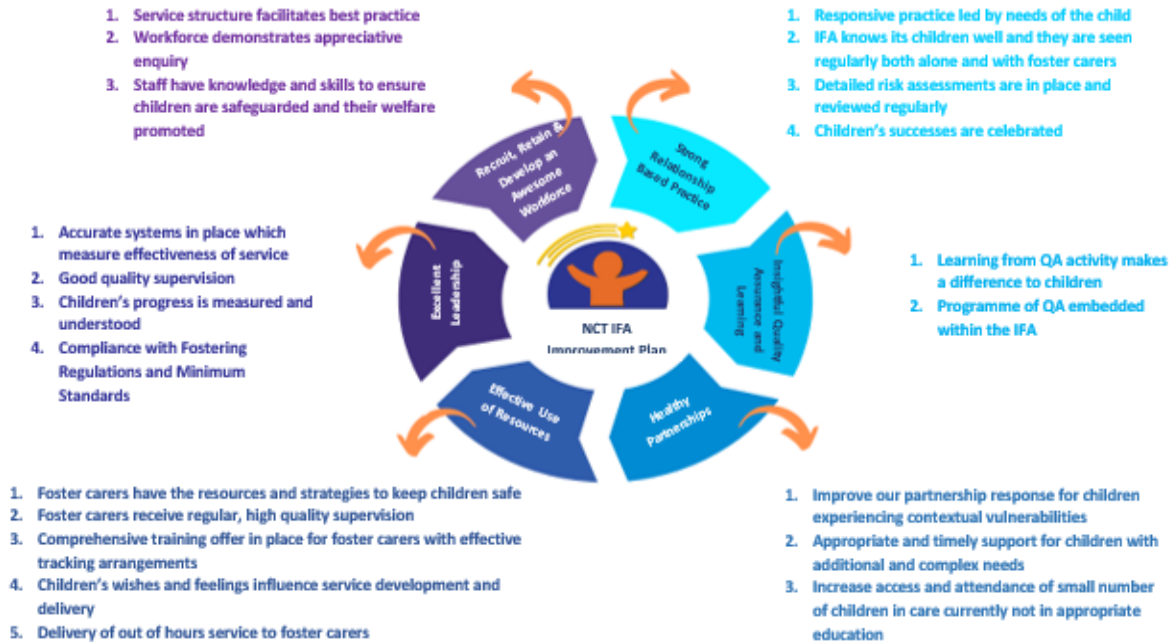
The expectation is that all of these children were visited by their allocated children's social work and their foster carer's allocated SSW very quickly after these complaints were raised. Training is identified where appropriate to support the development of foster carers in respect of the specific complaint raised.

Children are expected to be seen regularly in their foster placement and the dates and frequency of these visits are monitored within our Children's tracker. Children's 'wishes and feelings' are regularly sought, and children are made aware of how they can complain if they are unhappy with their fostering placement. Further tracking measures and auditing practices will be introduced to the Fostering Service to ensure that children are being seen in their fostering placements regularly and a new 'Visits to children' policy, to include reporting and recording expectations for SSWs, will be implemented to be able to better monitor this.

Children are always supported and encouraged to give feedback as to their experience of being in foster care for their own CIC Reviews as well as their foster carers' annual reviews.

15. Service Developments Planned for 2023 - 2024

Following the outcome of the SCCIF Inspection in February 2023, a robust Improvement plan remains in place for the Fostering Service which will be kept under regular review. The outcomes framework informing this plan include:



Additionally, the following targets for the growth and development of the Fostering Service remain in place:

<ul style="list-style-type: none"> ✓ Further develop of the infrastructure of the services reporting systems. NCT is committed to purchasing a system that is effective for a fostering service. 	<ul style="list-style-type: none"> ✓ The Fostering Strategy and Retention Strategy that has been implemented is progressed to ensure all the actions we are undertaking contribute to increasing our recruitment and the retention of our foster carers.
<ul style="list-style-type: none"> ✓ Continue to analyse the CRPD’s by end of March 23 to measure quality and identify areas of learning and development. 	<ul style="list-style-type: none"> ✓ Ongoing review and refinement of Review of Placement making/ Matching – implement use of matching tool and comprehensive recording system for vacancies.
<ul style="list-style-type: none"> ✓ To work together with our foster carers to improve on the training offer. 	<ul style="list-style-type: none"> ✓ Carer engagement: To continue to improve and do more, to engage, strengthen relationships, and develop a sense of belonging to the agency and have a broader reach with our fostering families.

✓ Continue to build upon the comprehensive foster carer support group offer now in place for carers.

✓ Review our support and financial offer in consultation with our foster carers. To ensure it is competitive and contributes to the retention of our foster carers.

✓ Ongoing recruitment to the Resilience Fostering Scheme.

✓ To progress the development of support to our carers and children outside of normal working hours by supervising social workers.

✓ Develop a regular and systematic way of reviewing all foster carer resignations and all placement break downs, to ensure we learn and continuously improve our practice and the support we provide.

✓ To continue to work in partnership with our marketing team and be instrumental in implementing our recruitment and communications strategy.



NORTHAMPTONSHIRE CHILDREN'S TRUST VOLUNTARY ADOPTION AGENCY ANNUAL REPORT

2022-2023



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1. Purpose of Report

The Local Authority Adoption Service Regulations 2003 and National Minimum Standards 2011 require adoption agencies to provide a written report to their executive, i.e. the Children's Trust Board and the North and West Northamptonshire Councils respectively in relation to the activity of the Adoption Agency.

In order that they are able to satisfy themselves that the agency is complying with the conditions of registration (Minimum Standards 25.6; Statutory Adoption Guidance 3.3, and 5.39). This report has been prepared to achieve this.

The report includes information about the activity and performance of the Northamptonshire Children's Trust Voluntary Adoption Agency (NCT VAA) for the period 1st April 2021 to 31st March 2022.

2. Introduction

Northamptonshire Children's Trust Voluntary Adoption Agency was formed and registered with Ofsted in November 2020 to provide adoption services on behalf of Northamptonshire Children's Trust.

In January 2022 NCT VAA had its first Ofsted inspection as a Voluntary Adoption Agency since registration, the outcome of which was that the service was rated as GOOD by inspectors.

In addition, in October 2022 Northamptonshire Children's Trust was inspected within the ILACS framework and the work of the adoption service was considered within that process with the inspection report noting that -

'Strong adoption work means that children benefit from permanence at the earliest appropriate opportunity, sometimes with foster to adopt carers. Adopters benefit from the support of passionate, knowledgeable and skilled social workers. Adopters reported positively about their preparation and journey to becoming adoptive parents'.



The table below provides an overview of the progress made during this reporting period toward achieving the identified areas for development from the 2022/23 period.

Area for Development	Actions Achieved	Impact
<p>Family Finding and Transitions Model to be embedded in practice utilising research undertaken by the UEA to promote positive transitions for children to adoption and promote ongoing relationships with foster carers post placement.</p>	<p>Model launched in May 2022 and now is fully embedded into practice.</p>	<p>Family finders state that the model supports consistent, transparent, and evidenced based practice which is focused on the child's needs. They feel the model has supported collective decision making with improved management oversight.</p> <p>Adopters and foster carers are positive about the increased opportunities for them to meet and get to know each other prior to introductions commencing which supports all involved to feel positive and give the child 'permission' to move on with opportunities to maintain contact post transition focused on child's needs.</p>
<p>Training and support to adopters and prospective adopters will be enhanced by the launch of the FAL (RAA) core training and support group offer which will be complimented at a local level in response to local needs.</p>	<p>FAL training calendar launched and online booking system in place managed via the FAL central hub team.</p> <p>Twice monthly support groups are facilitated by NCT (1 day time and 1 evening group) for adopters – see report for details in addition there is FAL support group which NCT adopters are also able to access.</p>	<p>Adopter preparation Training has a stronger focus on therapeutic parenting and the lifelong impact of early experiences which provides a good foundation for adopters understanding of the needs of adopted children.</p> <p>Adopters are able to access a wider range of training via the FAL calendar.</p>



<p>Support Services for birth families to be reviewed to ensure services meet the needs of families and support them to maintain relationships with their children, as appropriate, following the granting of an adoption or SGO order</p>	<p>A 'Taking Stock' review of services has been completed considering supports offered and aspirations for future development.</p>	<p>The service has made links with the PAUSE project – the adoption service manager is now a member of the PAUSE strategic partnership board.</p> <p>The service has linked with PAUSE project workers to identify a group of birth mothers who would be willing to meet, to gain their views on what support services they feel would be beneficial in order to support a collaborative / co production approach to future developments.</p>
<p>Develop service user feedback mechanisms to enable the voice of children young people and their families to inform practice and policy developments.</p>	<p>Online service user feedback forms have been developed that can be completed and returned anonymously via MS forms.</p> <p>Feedback forms have been designed to capture feedback at key points across the adopter assessment and placement process as well as for families accessing post order support services.</p> <p>FAL have additionally developed similar online feedback mechanisms to capture adopter experiences of FAL share service activity</p>	<p>Forms will be launched for use from April 2023</p> <p>Feedback themes will be reviewed quarterly by the adoption service management team to inform practice and policy developments</p>
<p>Awareness raising activities and training in relation to the benefits and challenges of direct contact in adoption to be established for adopters, SW's and panel members.</p>	<p>General discussions are had with social workers individually and collectively within team meetings re the benefits and</p>	<p>The impact of this work is limited at present as the work is in its infancy.</p>

	<p>challenges of post adoption contact.</p> <p>Panel regularly feedback in relation to exploration of post order contact when considering matches for children and adopters.</p> <p>Plans for post adoption contact are routinely discussed in permanence planning meetings.</p> <p>Initial scoping discussion have been held with researchers who conducted the UEA contact after adoption study in relation to a staff training day on this topic which would include adoption service staff, panel members and wider NCT staff.</p>	<p>Issues relating to <i>safe uncertainty, risk assessment and management</i> need to be explored in conjunction with this work and will be progressed during the 2023/24 reporting period</p>
<p>Adoption Service Staff Training and Development plan to be launched in April 2022.</p>	<p>Training and Development Plan was launched in April 2022 as planned.</p> <p>Alongside generic training adoption specific training has been sourced and accessed for adoption social workers and managers in line with the plan as follows during this period-</p> <ul style="list-style-type: none"> • Using the Secure Base Model in Adoption Assessments • Learning from Serious Case Reviews where children had been living with adopters, SGO carers or foster carers 	<p>Adoption staff report feeling valued by the provision of adoption specific training opportunities. Staff are particularly positive about the secure base training, and this is routinely utilized within prospective adopter reports to support analysis and evidenced based recommendations.</p> <p>Feedback from adoption panel chairs within their annual report acknowledged the <i>strong emphasis upon a learning culture within the agency.</i></p>

	<ul style="list-style-type: none"> • 'We are Still Humans' supporting Birth Parents through the adoption process and contact • Assessing Prospective adopters considered for Sibling Groups • 'Blended Families' – Adoption from the perspective and experience of birth children <p>Alongside formal training the service hold monthly <i>learning lunches</i> which provide opportunities for workers from across the service to share areas of interest or expertise with each other to promote a culture of shared learning.</p>	
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3. Service Remit

The voluntary adoption agency was registered in November 2020. Prior to this, it operated as the adoption service for the local authority.

Co-location of adoption staff within the NCT office base supports collaborative working in relation to planning and placements of children for whom adoption is the plan and in relation to families in receipt of post order support services where there may be safeguarding concerns.

The Adoption Agency has the following remit:

- Recruitment, preparation, and assessment of adoptive parents.
- Family finding for children for whom Northamptonshire Children's Trust has a plan of adoption.
- Adoption Support to include provision of assessment and support to children and families both pre and post Adoption Order, services for adopted adults to access their birth records, support for



birth families affected by adoption, Letterbox contact exchange and support with direct contact post order.

- Support for children, young people and families for whom a Special Guardianship Order has been granted.

4. Family Adoption Links Regional Adoption Alliance

In January 2022 Northamptonshire formally became a partner of Family Adoption Links (FAL). This is a regional adoption partnership bringing together adoption services across Rutland, Leicestershire, Leicester City, North Lincolnshire and Lincolnshire and Northamptonshire. It aims to provide excellent, friendly inclusive services to those looking to adopt and families who have adopted.

As a partnership we are working together to improve outcomes for those children who enter care and are not able to return to their families of origin. We aim to ensure that *our* children achieve emotional, physical and legal permanence; growing up in loving homes with adults who provide them with a strong sense of security, continuity, commitment and identity.

FAL operates through a hub and spoke model enabling NCT to benefit from coordinating central functions whilst retaining direct service delivery functions within their own borders. This ensures the Partnership reflects the local context, adapted to meet the needs of local children and families, and maintains clear links to local Children & Families Services.

During the 2022-2023 reporting period the service has become a fully embedded partner within FAL with representation on all work stream and management groups. NCT have led the work to develop a FAL stage 1 pack for social workers supporting consistent practice across the partnership and are leading the Early Permanence work stream.

The FAL partnership supports NCT, and other agencies, to extend their support and training offer to adopters at all stages of their journey and work undertaken via the family finding work stream is supporting the tracking and placement of children from across the partner agencies with **82%** of partner agency children now being placed within the region with their families benefitting from the development of supports, training and consistent practice models delivered by the partnership.

In October 2022 the partnership launched the **Adopter Hub** and **Collabor8** groups, the purpose of which is to develop forums to support consultation and co-production of services going forward. The *Adopter Hub* group has representation from adopters from all partner agencies and similarly *Collabor8* is a group for adopted young people. The focus of discussions and topics is led by the groups and



supported by FAL staff – both groups have chosen to focus on education in the first instance and these discussions will be fed into work within the education work stream and development of the *education passport*.

5. Service Structure

The Registered Individual for the Voluntary Adoption Agency is Christina Skeel. Operational management of the service is provided by Tracy Morton as Adoption Service Manager supported by team managers responsible for two teams and an adoption panel service as outlined below.

Adoption Recruitment, Assessment and Family Finding Team
Team Manager x 1
Practice Manager x 2
Family Finding Social Worker x 2
Senior Social Worker x 1
Social Worker x 8
Administrator x2
Post Adoption and SGO Support Team
Team Manager x1
Practice Manager x 2
Post Adoption Counsellor x1
Post Adoption Adults Co-ordinator x1
Adoption Support Co-ordinator (Letterbox) x1
Family Support Worker x 1
Financial Allowances Officer x1
Administrator x 2
Adoption Panel
Panel Adviser x1
Panel Co-ordinator x1.5
Panel Administrator x1

All social work staff are registered with Social Work England. Workers within the service have a range of post qualifying experiences and are supported by NCT to add to their academic and professional qualifications to enhance their practice as appropriate.

Recruitment is carried out in line with the NCT's Equality and Diversity policies and recognises good employment practice. NCT and the Adoption Agency seek to recruit a diverse workforce that reflects the community that they serve. All staff having direct contact with children must undergo enhanced checks with the Disclosure & Barring Service (DBS) to ensure that they are suitable to work with



children. In line with a recommendation made as part of the Ofsted inspection a safer recruitment checklist for the Voluntary Adoption Agency has been developed to sit alongside NCT's recruitment process which ensure that the safe recruitment of staff meet the required standards. ('Adoption: national minimum standards,' page 71, paragraph 24.1)

Social work staff have regular monthly supervision from their managers, and their professional competence is appraised annually in line with NCT's staff supervision and staff appraisal schemes.

In line with the requirement made as part of the Adoption Ofsted inspection in 2022 a standalone Adoption Service Training and Development programme has been developed and was launched in April 2022 to ensure compliance with The Voluntary Adoption Agencies (Miscellaneous Amendments) Regulations 2003, regulation 15(2)(a) this will be reviewed in April 2023 and updated as appropriate. In addition, the supervision record used by the adoption service was also amended to reflect compliance with regulations.

6. Adoption Panel

All Adoption Agencies, whether Local Authority or Voluntary Adoption Agency are required to have an Adoption Panel under Regulation 3(1) of the Adoption Agencies Regulations 2005. The Panel makes a recommendation to the Agency Decision Maker in relation to:

- The suitability of prospective adopters to adopt
- The proposed placement of a child with a particular prospective adopter
- In the case of children whose birth parents are consenting to their adoption, a recommendation as to whether the child "*should be placed for adoption*"

The Agency Decision Maker then makes a decision on behalf of the agency, taking into account the recommendations of the panel and all relevant assessments and reports.

NCT VAA adoption panel is held weekly, as required, to support the timely approval of prospective adopters and progressions of matches for children. The panel adviser acts as the day-to-day link between the agency and the independent panel chairs and this is further supported by regular meetings and shared training opportunities between the agency, panel chairs and the agency decision maker. In November 2022 a panel training day was jointly facilitated by the panel chairs and the service and focussed on two key areas.



1. Learning from the Child Safeguarding Practice Review, undertaken by Cumbria Safeguarding Children Partnership, following the death of Leiland James Corkhill who was placed for adoption and whose adopted mother was convicted of his murder.
During the session the chairs presented an overview of the case and facilitated group discussions with panel members focussing on key areas of practice followed by a presentation from the adoption service manager of NCT VAA response and learning from the report.
2. Cultural Competence with a presentation of the experience of a family moving to the UK in the 1960's and the discrimination they faced and overcame then and now.

Feedback from panel members about the day was positive regarding opportunities for reflection, discussion, and learning.

It is recognised that there is a positive and respectful working relationship between the agency and the panel chairs with challenge being offered and considered by both sides appropriately. Regular liaison meetings support the ability to address themes from feedback quickly when necessary and as such there are no surprises in the 6 monthly or annual panel reports to the agency

During the 2022-2023 reporting period, the panel met on **41** occasions and considered the following number of cases on behalf NCT VAA

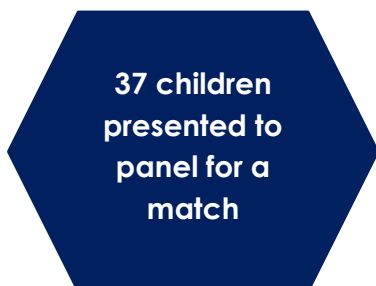
Adopter approvals	31
Matches for NCT children	37
Plans for Relinquished children	0

7. Adoption Service Performance

Adoption performance is measured and reported nationally via the completion of the Adoption and Special Guardianship Leadership (ASGLB) return which forms the basis of the publication of the adoption scorecard.

At the time of completing this report the adoption scorecard for the 2022 – 2023 reporting period has not been published as information from Q4 returns is not due for submission until the end of April 2023 and data will be then require validation prior to publication.

What we know from locally held data is that of the children matched with adopters during the 2022-2023 reporting period 41.67% were matched within 4 months of a placement order being granted this equates to 15 children. Of the remaining 21 children 44.4% were placed within 4 to 8 months of the PO being granted which equates to 16 children and 13.9% which equates to 5 children were placed within 8-12 months of the Placement Order being granted within this cohort there were 2 sibling groups of 2 boys.



**37 children
presented to
panel for a
match**

- ❖ During the 2022/23 reporting period **37** Northamptonshire Children were matched and placed with adoptive families of which:
- ❖ **26** were placed with adoptive families recruited, assessed, and approved by Northamptonshire Children's Trust Voluntary Adoption Agency (NCT VAA)
- ❖ **11** were placed via inter agency placements (adopted families recruited, assessed, and approved by another agency)
- ❖ In addition, **6** children were placed by other Local Authorities with NCT VAA approved adopters.

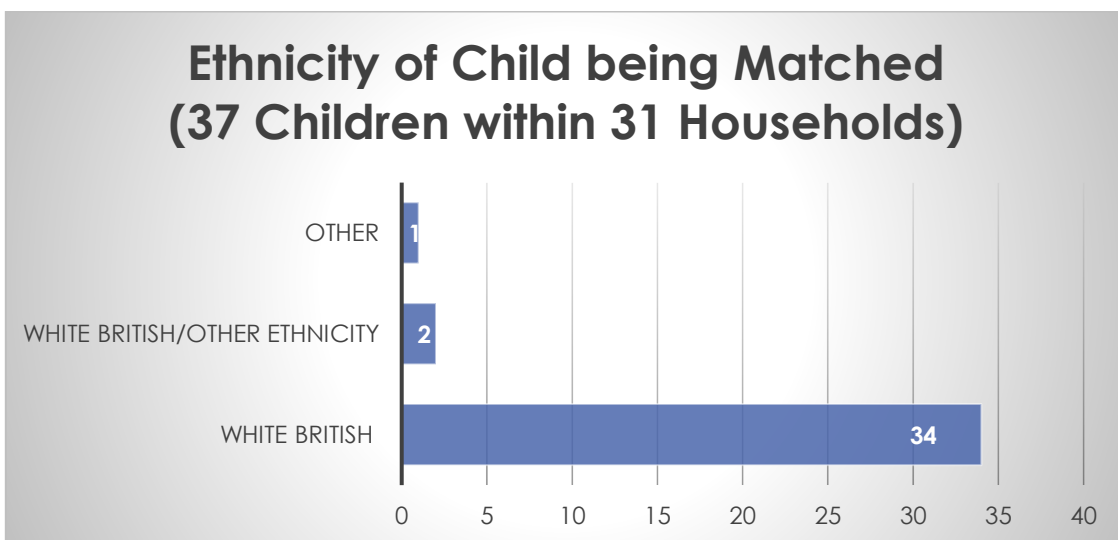
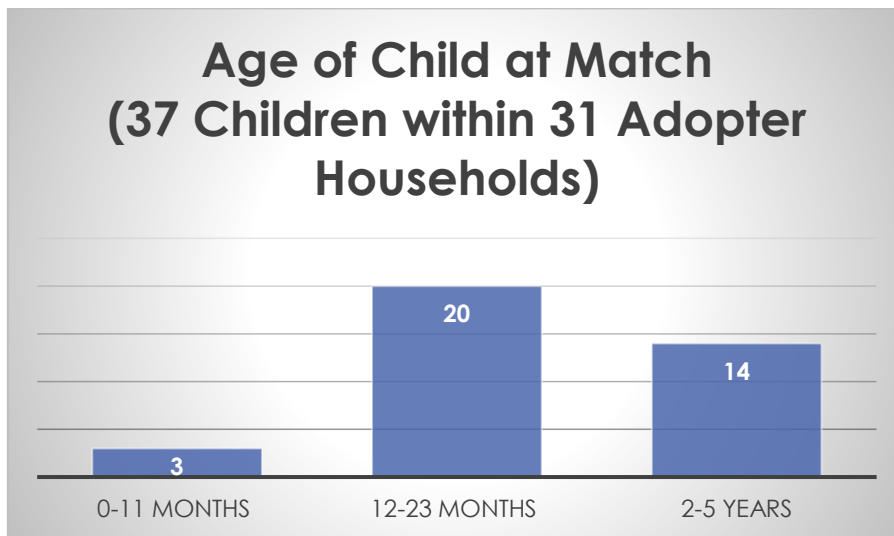
In relation to the 11 children placed via inter agency placements these were three sibling groups of 2 children and five individual children for whom placements with families who were considered as being able to meet their holistic needs and seen as the *best match*. Of these 11 children 5 were placed with FAL partner agency adopters.

In relation to the 6 children placed with NCT VAA adopters these consisted of 5 individual children and a sibling group of 2. Two of these children were placed from a FAL partner agency.



During the 2022 – 2023 reporting period 56 children for whom NCT were responsible had a plan of adoption agreed via the Agency Decision Maker compared to 41 during the 2021 -2022 reporting period. This number is still lower than during the 2019 – 2020 reporting period when 59 children had a plan of adoption but does indicate a steady return to pre pandemic activity levels.

The charts below provide an overview of the age and ethnicity of the children matched for adoption.





The data indicates that the majority of children matched for adoption are aged 12-23 months – given that within this cohort 13 of these children had benefitted from an early permanence placement which has allowed them to be placed with their prospective adopters, on average, 183 days sooner than would have been achieved via a traditional adoption placement route this will translate to a much higher percentage being placed in their permanent placement under 12 months of age which is beneficial for their longer term stability and attachment development. There is also a high proportion of children placed aged 2-5 years which reflects the agency's ambition and success in exploring adoption 'not just for babies' and in terms of keeping siblings together when it is assessed to be the right plan for them.

8. Family Finding

Family finding for NCT children for whom adoption is the plan is undertaken within the adoption service. There are two social workers whose role is dedicated to the family finding task and they are supervised by a practice manager who has oversight of all family finding activity.

The use of fortnightly tracking meetings for all children from the point that a parallel plan of adoption is made is supporting the service to identify at an early stage any emerging themes or needs in relation to the characteristics of children likely to require an adoptive family. In conjunction with this the introduction of **permanence planning meetings** led by the Family Finding workers is supporting the ability to have conversations at the earliest opportunity with childcare social workers in relation to children's needs, future contact plans, life story work and the identification of key family members who may either be able to offer permanence for the child or for whom an ongoing contact arrangement could be considered if the ultimate plan were adoption.

Family Finding social workers report that;

'PPMs are well and truly established and useful. They support Family finders and their practice managers to know the children. The meetings are useful for child care social workers, particularly those new to adoption & permanence planning.'

The adoption service manager is a member of the unborn baby tracking meeting which has supported the ability to identify at the earliest opportunity babies who may have a plan of adoption or where early permanence placements could be considered.

Alongside this fortnightly tracking meetings are held in relation to adopters which is supporting the ability to identify and consider links between adopters and children at an early opportunity and to identify if an external adopter resource may be needed.

In March 2023 the service introduced a monthly Adoption Tracking Panel the purpose of which is to;



- Monitor the progress of adoption plans for looked after children upon the conclusion of care proceedings to reduce drift and delay in achieving the agreed plan
- Advise and make recommendations in respect of care planning and consider the potential for the use of early permanence placements. For families where previous children have been placed for adoption consider the appropriateness of early discussions with previous adoptive families
- Monitor and advise on permanency planning processes to maintain a focus on plans being progressed in a timely manner
- Track permanency planning for adoption from the conclusion of proceedings through to the point it is secured for the child
- Endeavour to resolve any presenting issues/obstacles and ensure that there is effective communication between the professionals involved
- Escalate concerns with senior manager, as required, where cases highlight drift or difficulties that will hinder implementation of agreed plans
- Provide 6 monthly reports to the SLT on the numbers of cases reviewed, outcomes and any practice issues
- Monitor cases in respect of changes of permanence care plan and ensure that revocations of orders are progressed in a timely way e.g., placement or care orders
- Panels will agree a review period on a case-by-case basis generally between 3 and 6 months.

Whilst there has only been tracking 1 panel held at the time of writing this report it has demonstrated the value of the additional level of oversight and professional curiosity brings to the care planning and monitoring process for the child.

As the FAL partnership develops there is an increasing shared ownership of the family finding task in terms of taking a whole partnership responsibility for oversight of children waiting for placements across the region. Monthly FAL family finding meetings share information in relation to children and adopters waiting to support the early identification of potential links across the partnership and all partner agency children's detail are placed on the FAL link maker site from the point that the ADM agrees a plan of adoption.

This collective ownership supports the partnerships' ability to be responsive to the needs of children waiting for placements across the partner agencies e.g., in organising adoption activity days, profiling events or featuring children (anonymously) within the partnership website

On 27.1.23, the partnership held a virtual profiling event called a 'Discovery Event.' The Discovery Event provides registered adopters with a secure link to where they are able to see information



including videos, photos and an overview of the child provided by a recording of the social worker and /or foster carer talking about the children. The secure link is accessible to view for a period of 72 hours.

The partnership has also held two in person activity style days called 'Getting to Know You' events on 14.10.22 and 18.03.23

Below is an overview of the numbers children who attended these events and the impact -

Getting to Know You Event – June 2022

16 children attended the event 1 of whom was from NCT. The event resulted in 4 partner agency children being matched with adopters.

Getting to Know you Event – March 2023

13 children attended this event 1 of whom was from NCT. The event resulted in 6 links being explored for children of which 2 were with NCT adopters.

Discovery Event – January 2023

The secure link video was viewed 171 times and over the weekend that it was shared Linkmaker enquiries quadrupled in relation to the children featured

All adopters who attended reported the event was beneficial for them with specific feedback noting that –

'We found it beneficial being face to face with children'

'It was nice to spend time with children, not just looking at profiles'

During the 2022/23 reporting period in addition to the above at a local level the service have held 2 *virtual profiling events* where approved and waiting adopters are provided with anonymised information about children for whom the service are family finding to support the ability for adopters to remain open minded in relation to the characteristics of the children they may be able to consider, adopters were also able to hear how the service identify and match children and the processes involved in this.

Feedback from adopters attending the sessions was that -

'Adopters felt reassured about the robustness of the matching process and pleased that they weren't aware that they were being considered for a particular child until it was identified that the match was positive'



A practice guidance model for family finding and adoption transitions was developed and launched in May 2022, the practice model was designed utilising the research and transition model developed by the University of East Anglia (UEA). The model has strengthened existing family finding practices and led to a more child focussed, evidence based and transparent approach to matching and linking.

'I feel linking with our adopters is much more child focussed this past year.' – Quote from Family Finding Social Worker.

When family finding for children, it is essential that adopters are supported to make an informed decision in relation to linking and matching with a specific child or siblings. The new family finding model incorporates increased opportunities for foster carers and adopters to meet and share information ahead of the formal introductions process and for adopters to have *anonymous 'getting to know you'* meetings with the child to help them to *'learn the child'* outside of the formal introductions process. Feedback from foster carers and adopters who have experienced these meetings is very positive. Family Finding Social workers report that;

'Without exception, all foster carers, adopters and social workers have expressed very positive views re the 'Getting to Know You visits'. Feedback has been that these have had a positive impact on introductions with the child and adopters feeling better prepared for the intensity of introductions being familiar with each other already. Prior to the changes last year these were done with some but not all children. Feedback has been that all involved are pleased these are now in place for all of our children.'

As a result of work undertaken by the service to consider the learning from the Child Safeguarding Practice Review, undertaken by Cumbria Safeguarding Children Partnership, following the death of Leiland James Corkhill the service has developed a presentation which will be delivered to the support network of adopters prior to the children being placed with them which revisits some general topics from family and friends training they may have attended but is personalised to focus on the specific child's early life experiences. The session will be facilitated by the adoption SW and focus on what the child's early life experience may mean now and in the future for the child and adopters and give ideas in relation to therapeutic parenting techniques that may be useful. The session will also reinforce that until an adoption order is granted the child remains a looked after child and that the adopters will have delegated parental responsibility during this period, what this means and also the responsibilities of the network in respect of sharing any concerns they may have both in relation to the support needs of the adopters and in respect of the welfare of the child. These sessions will commence for matches progressing from April 2023.

9. Early Permanence

Early Permanence placements allow babies and young children who may need adopting to be placed with a potential permanent family earlier than a conventional adoption.

Early Permanence is an umbrella term we use when talking about certain types of adoption placements for babies or toddlers. It includes placements also referred to as Fostering for Adoption (FfA) and Concurrency placements.

Early Permanence helps to avoid delay in deciding a very young child's future, at a time in their life when days and weeks really matter.

Findings from the Coram 2017/18 Longitudinal study of Early Placements noted that early placement is not a panacea but offers the opportunity to build secure attachments from the earliest age. This has created stability of placement despite the difficulties presented which in turns supports the long-term connection and understanding of the adopter in respect of their child and has benefits in relation to maintaining relationships with birth family relatives and the child's life story.

**13 children
 were placed in
 early
 permanence**

- ❖ During the 2022- 2023 reporting period 13 Northamptonshire children benefitted from early permanence placements. This allowed these children to be placed within their prospective adoptive placement an average of 183 days earlier than if a traditional adoption placement route had been followed.

There is currently a national focus on the use of early permanence placements for children with a view to increasing the use of such placements for a wider range of children including siblings. The adoption service manager is leading the FAL Early Permanence workstream and attends national learning events to support the development of practice and process at a local and regional level. As part of the agreed work plan for the FAL Early Permanence workstream an application for the *Working Towards Early Permanence Quality Mark* is being prepared for submission in the summer of 2023.

10. Adoption Orders Granted



- ❖ During the 2022-2023 reporting period 32 adoption orders were granted for Northamptonshire children.
- ❖ In addition to adoption orders granted at the end of the reporting period there were a further 17 children in adoption placements awaiting the adoption order.

11. Adoption Disruptions

During the 2022 – 2023 reporting period sadly there were 3 disruptions to placements of children pre-adoption order. These 3 disruptions equate to 5 children – 2 sibling groups of 2 and 1 single child.

Disruption meetings have been held in relation to the two disruptions involving the siblings and a third meeting is scheduled for April 2023 in relation to the 3rd disruption. Disruption meetings are chaired by an independent chair with experience and expertise of adoption who, following the meeting, produces a report and practice recommendations for the agency as appropriate.

Disruption meetings are not intended to apportion blame to individuals involved and recognise and acknowledge that disruptions occur due to complex, multi-faceted issues which could not have been predicted, that said they provide a valuable forum for reflection, review, and learning.

As an agency we have used the learning from these meetings to review and develop our practice, strengthening areas of potential vulnerability and have produced reports in response to the recommendations made. Reports are shared with panel, and we have plans for a joint service and panel learning event to consider the key themes emerging from the meetings.

12. Adopter Recruitment

The service offers a daily enquiry line which those considering adoption can access to speak directly with an adoption social worker should they wish to do so. Information in relation to adoption and an online enquiry form can also be accessed by the website which has been rebranded as the service has become a member of the Family Adoption Links Regional Adoption Alliance. As a result of this



membership monthly information evenings are now managed and delivered centrally by the partnership.

Below is a selection of feedback provided by prospective adopters attending the sessions.

'Whole presentation very good and all useful'

'I found it very informative, I had already read and researched the information given, but hearing it directly also clarified a few thoughts I'd had about it. I think if anything could be improved, it would be to go through any questions at the end as it broke up the continuity of the information given. But I had a really enjoyable evening.'

'The most useful part of the process was hearing from people who had gone through the adoption process.'

A central calendar of training including preparation training for adopters is accessible via the FAL website, in addition NCT adopters are able to access locally provided training details of which are included later within the report.

At a local and national level there are recognised challenges in identifying placements for sibling groups, children from black minority ethnic backgrounds, children over the age of 5 or those with additional or complex health needs and the service will undertake specific marketing activity to attract adopters able to consider children with these characteristics as required. The website includes anonymised information in relation to children waiting for adoption from these *priority groups*, these stories are regularly updated in order to maintain a focus on the children and interest of prospective adopters.

As a partner of Family Adoption Links Regional Adoption Alliance (RAA), the VAA is able to utilise a broader range of adopter recruitment and awareness raising opportunities via social media and at a local *'in person'* level. All of which is undertaken in liaison with NCT Communications colleagues.

During the 2022-2023 reporting period enquiries to adopt and attendance at information events was centrally managed and coordinated by the FAL hub team. During this period across the FAL partners 778 households registered to attend an information event of which 137 were NCT VAA enquiries with 395 households attending 111 of which were NCT VAA enquiries.

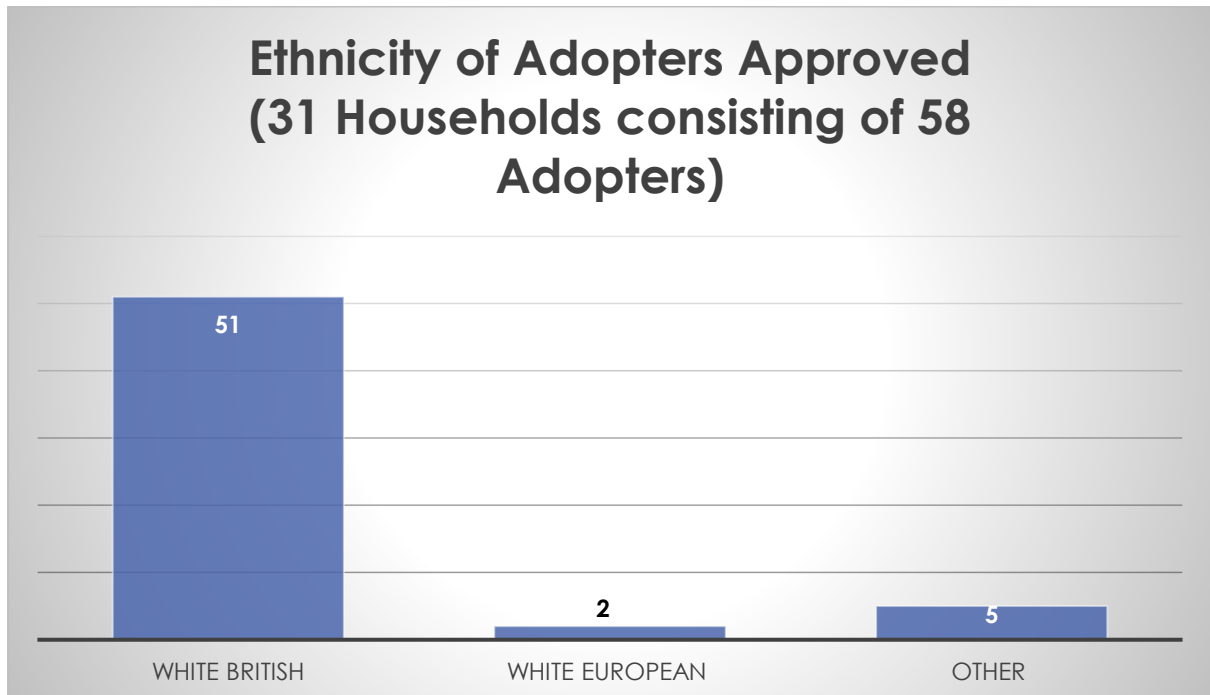


Overall NCT enquiries in this reporting period resulted in the progression to stage 1 of 28 Adopters, 25 of which have progressed to stage 2, which resulted in **31** adopter households being approved, a demographic breakdown of which is illustrated within the tables which follow.

Below is a sample of feedback from adopters in relation to their NCT VAA adoption assessment experience.

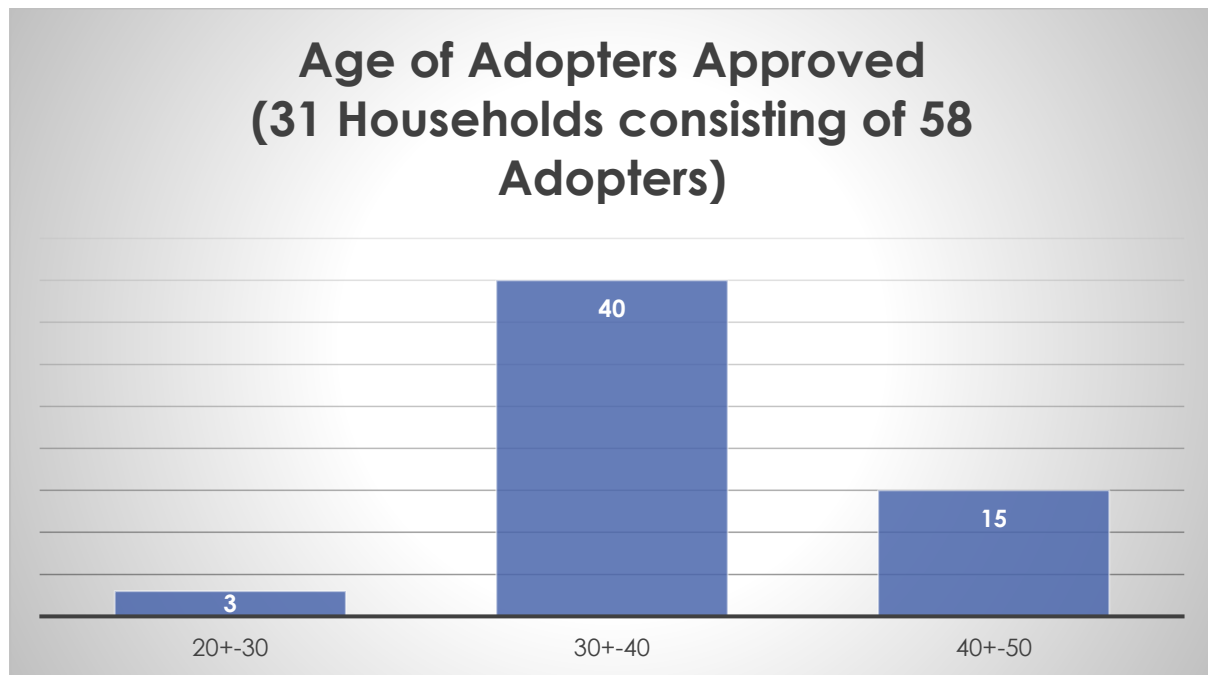
'We have been lucky to have had the same adoption social worker throughout our process, and have a good relationship with them, as we feel we can ask her anything especially for support.'

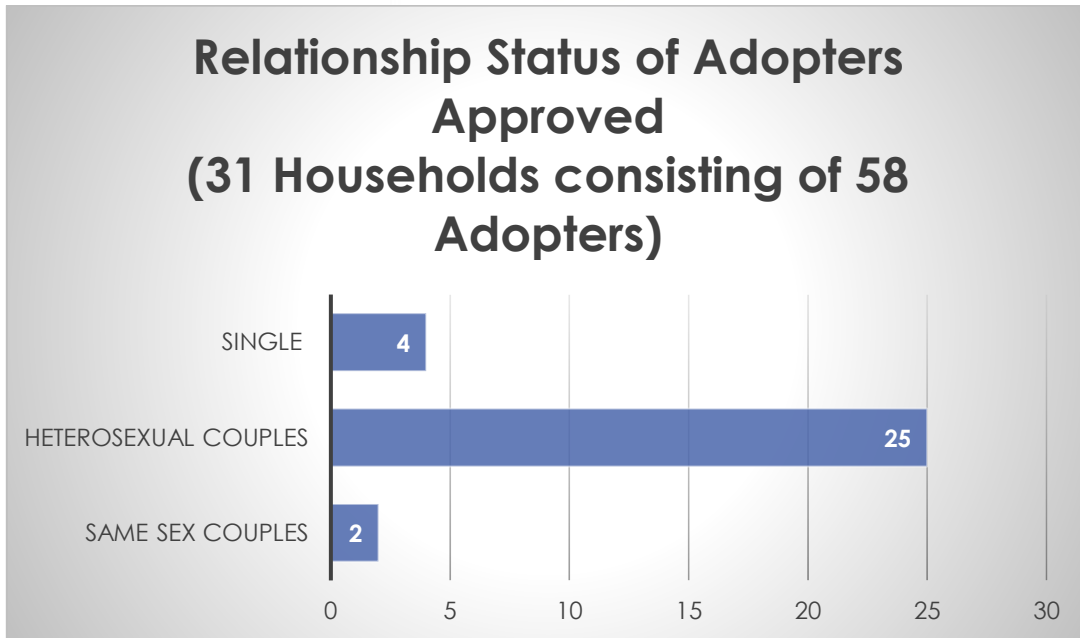
'Our social worker has been amazing throughout the process; she has talked us through all the sections of process and supported us when things got a bit tough in looking for a match.'





As outlined above the ethnicity of NCT adopters recruited broadly reflects the ethnicity of NCT children for whom adoptive placements are sought. As an agency we are always mindful of the need to recruit a broad range of adopters able to meet the needs of children at a local, regional and national level and as such marketing activity and materials designed in conjunction with our FAL partners aims to reflect this. Our FAL partner agencies have differing ethnic and cultural demographics to NCT which supports the partnership to work collaboratively at a regional level to identify cohorts of children with a plan for adoption and target recruitment activity in response to this.





Timeliness of adopter assessments is tracked via the adoption panel as part of their quality assurance process, during the 2022-2023 reporting period the panel noted that 41.94% of stage 2 adopter assessment presented to panel were completed within the recommended 12 week timescale. This is in part due to unprecedented level of staff absence within the service during this period and also due to the complexities presented within the assessment for some households which, in some instances, has led to the need to pause the assessment process or to extend it in order to give sufficient time to explore issues and undertake a robust assessment. The service is mindful of this and will monitor this timescale going forward – strengthened practice during stage 1 of the assessment should support the ability to progress applicants at a time that is right for them and identify any issues that may need addressing prior to commencing stage 2. We have a target for completion of stage 2 assessments within the 12-week timescale of 80% for the 2023- 2024 reporting period.

The adopter recruitment and assessment team work closely with colleagues within the post order support team who are able to offer advice on adoption support and learning opportunities in preparation for the matching and placement of children with an adoptive family. Post adoption support is routinely discussed with prospective adopters during their training and preparation and the post order team co-deliver the preparation training provided to adopters. Workers from the post order support team are available for advice and consultation with SW's and adopters when placements are being considered and during transitions and early stages of placement.

As a result of the publication of the Leiland James Corkhill Child safeguarding practice review, undertaken by Cumbria Safeguarding Children Partnership, the service has undertaken a review of adopter assessment, family finding and support practice and as a result have introduced additional measures to support robust safeguarding. These include the requirement to seek references from counsellor's adopters may have engaged with and more detailed exploration of financial information including debt management during stage 1 of the adopter assessment process. In addition, we have introduced an 'end of stage 1 meeting' which is chaired by the adoption team manager and is the point at which the applicants experience, and views of their stage 1 process are discussed, references and checks are reviewed and progression to stage 2 is discussed and agreed as appropriate. A direct work tool kit has been developed to support social workers to gain the views and support an understanding of the *lived experience of children already part of the prospective adopter household* including birth children, step-children or previously adopted children.

13. Step-Parent Adoption



- ❖ In addition to adopter recruitment, assessment, and preparation the team also undertake assessments for Step-Parent Adoption. During the 2022 -2023 reporting period the service received 120 enquiries in relation to applying for a step-parent adoption and undertook 9 step-parent adoption assessments resulting in 6 adoption orders being granted.

14. Adoption Support

The Post Order Support Team provides support services for children, young people and their families following the granting of an Adoption or Special Guardianship Order (SGO). In addition, the service provides specialist support to birth relatives via an independent counsellor based within the team and supports adopted adults wishing to access their birth records.

These services include:

- Counselling, information and support for birth parents whose children have a plan of adoption or are placed for adoption



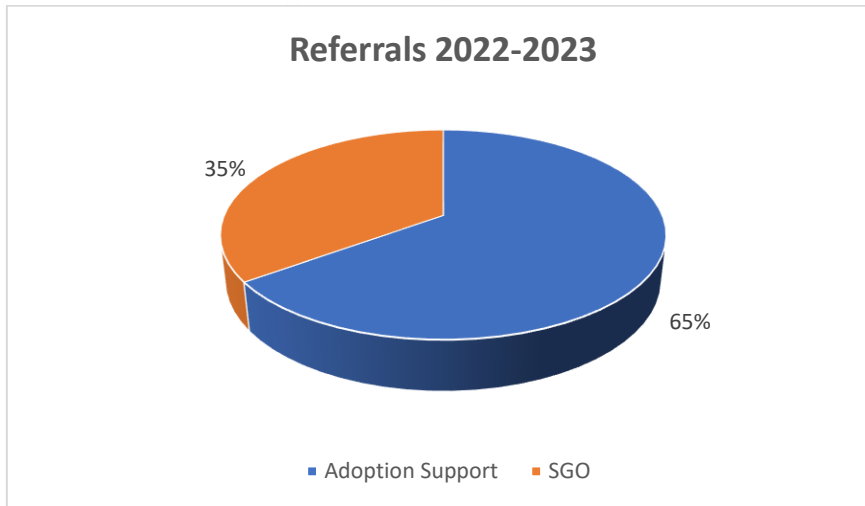
- Counselling for adopted adults in accordance with Schedule 2 of the Adoption and Children Act 2002. Those wanting intermediary service to track birth relatives are signposted to appropriate independent agencies.
- Assessments of adoption support needs pre and post order and when appropriate will make applications to the Adoption Support Fund to support the provision of therapeutic services for adopted children and their families.
- Comprehensive adoption support for those affected by adoption in line with the Adoption Support Services Regulations, both prior to and after an Adoption Order has been made. This will include adoptive families' not known to the Agency who reside in the County and request adoption support assessments three years after their Adoption Order was granted. Likewise, the team provides adoption support to adoptive families who have adopted placements Northamptonshire children but live outside of our area for a period of three years after the granting of the Adoption Order.
- Post order support services for families where children are placed under a Special Guardianship arrangement.

As previously mentioned, Post adoption support is routinely discussed with prospective adopters during their training and preparation, and day 2 of the adoption preparation training is delivered by workers from the post order team. Workers from the post adoption support team and the adoption recruitment team now co facilitate adoption support groups which provides further opportunities for adopters to speak to and become familiar with the post order team

What we know from the feedback received from the families with whom we work, other professionals and from the Ofsted inspection is that what we do has a positive impact upon children, young people and their families both in terms of supporting the quality of family life and relationships and in terms of children managing to access education.



- ❖ Of these referrals 65% related to adoption support and 35% to SGO support as documented below.
- ❖ Resulting in 160 assessments of need.



The post order support offer for families starts with the provision of a listening ear and an open door, provided via the VAA duty social work facility, which is open to all SGO and adoptive families. Contact information for this is outlined in both Adoption and SGO Support Plans which are prepared for the families at the point the child or young person is placed with them and accessible via the Adoption service website.

There is a duty worker available daily to respond to contacts from families. The duty worker can offer advice and signposting and if appropriate will commence the referral/initial assessment pathway to families and will use a Developmental Dyadic Practitioner (DDP) informed approach to offer an empathic and supportive experience to a family.

The service works closely with colleagues in NCT Children in Care teams to provide information in relation to support services and are available to offer in person information and advice to those families considering SGO.

During the 2022/23 reporting period the service has worked collaboratively with colleagues within the fostering connected persons team to develop an SGO pathway which included information for prospective SGO cares in relation to the role of an SGO carer, training to help them prepare for the role and understand the lifelong implications for children of their early life experiences and supports available. The SGO support plan document has been updated to support an improved emphasis on the likely and known support needs of the child and therefore what support the SGO carers may need. During January 2023 SGO workshops were delivered to staff across NCT to launch the SGO pathway and a further session are planned which will be recorded and can be used within the training and induction process for new employees.



At times SGO and adoptive families may be in receipt of services via NCT safeguarding teams in these circumstances the post order team will provide advice and support as a member of the *team around the child* in recognition of their post order status and the lifelong implications of their early life experiences.

On a national level there is a focus on support and services provided to SGO and Kinship carers, as a service we are participants in the East Midlands Permanence Board Project /Steering Group the focus of which is Improving Services to SGO and Kinship Carers. The work of the group is in the early stages and an audit of services and current provisions for partner agencies has been completed and will inform priorities and focus going forward.

15. Social worker support

Both the social workers and family support worker within the post order support team are trained in a combination of therapeutic parenting interventions including

- Therapeutic life story work at foundation and diploma level
- Theraplay© at foundation level, higher level and on the practicum with clinical supervision
- DDP at level one and level two
- Video Interactive Guidance
- NVR at foundation level
- BUSS model

This supports the team's ability to undertake focussed direct work with children, young people, and their families. The team have developed a number of tools to support them to gain the views, wishes and feelings of children including a young person's referral form and a suite of direct work resources. A children and young people's guide to post order support has been developed and is available via the website link below:

[https://www.nctrust.co.uk/adoption-fostering/Documents/Post Adoption Support A guide for children.pdf](https://www.nctrust.co.uk/adoption-fostering/Documents/Post%20Adoption%20Support%20A%20guide%20for%20children.pdf)



During the 2022/23 reporting period the service has facilitated three therapeutic based programmes for families which include two types of group-based support and one individual programme for families as follows.

Empowering Parents Therapeutic (EmPaTh) groups:

These are groups to support therapeutic parenting, delivered by a therapy provider on a commissioned basis and funded by ASF or directly by NC Trust where ASF access is not available. To date, there have been five groups completed and there is one group currently ongoing. The groups last for 12 weeks and are led by a psychologist and supported by a therapist.

35 families (representing 69 children) have engaged in the groups and feedback has been extremely positive. Access to the groups is offered as soon as a family contact the team for support and some families attend groups prior to being allocated a social worker, whereas others attend the groups as an outcome of an assessment of need and this may be alongside the support of a social worker.

25% of those who attended the groups did not seek any further support outside of the groups, which indicates that the support made sufficient difference to eliminate the need for more intrusive/intensive social work support.

Feedback has been extremely positive, with 71% of families providing written feedback which indicated that the course was helpful and was very positive. Examples of general feedback include:

“The course has really helped me to be still and calm and not try to fix everything straight away and to be more accepting of the situation”

“It hasn't been easy, but it has been useful”

“Easy minor tweaks to what I was already doing made quite a difference”

“I've tried to use a few strategies with my child and when I have, it has worked really well. It's trying to remember to use them and not react in the moment. As I definitely see a different outcome when I use a strategy learnt on the course, then reacting to certain behaviour. Sometimes difficult though.”



Energy Groups

These groups have been run over a six week period for children aged 5-9 who are struggling with emotional regulation. The groups use a combination of the BUSS method and interoception curriculum to support children to build awareness of body sensations which will support emotional regulation.

As a result of building up the child's interoception awareness, using fun sensory based activities and 'experiments', the programme seeks to increase the child's awareness and encourage the child to link their body sensations with emotions and hence to learn about their triggers and gain valuable coping strategies which support emotional regulation and result in more positive choices/behaviours. Parent sessions assist families to learn about their child's sensory needs and how to support them and a parent participation session is included as part of the groups.

The groups have only just commenced, and we have so far reached 8 children with the first group. Feedback from parents is in the process of being gathered in the one to one applying the learning sessions but an early comment that was offered in writing was:

"The regulation group was brilliant and has given me loads of ideas"

Building Bridges

This is a six week programme facilitated by the family support worker which uses a DDP and Theraplay© base from a qualified Theraplay© and VIG practitioner. The programme focusses on empowering parents to start to understand the trauma needs of their child and to use PACE model to meet the individual needs of their child. Observations of the parent-child relationship form the basis of parent coaching and support.

This has been offered to 6 families this year and feedback has been positive, including:

"I just want to say what a difference (the worker) has made to our lives. She has helped us through a difficult time and given us the tools and strength to keep going"



At times parents, carers and children can be in a place of feeling very distressed and getting the help they need to understand their children can change life for everyone. Below are some examples of the feedback received from families accessing the service:

“Thank you so much for all you’ve done for us this year, it makes the world of difference! “

“(worker) gave us loads of practical strategies and was really able to get to the reasons behind Arthur’s behaviours. Dee has an incredible wealth of knowledge and was excellent in supporting us. She is so easy to talk to and very friendly. We really enjoyed the sessions with her.”

“(worker) was kind, capable and professional and genuinely cared about improving C’s situation”

As is evident from the feedback above families accessing services from the team feel that those interventions had a positive impact on their family life and the wellbeing of their children. This is also a view shared by other professionals involved with the families, working collaboratively with the service to consider the holistic needs of the child or young person. The service has built positive links and working relationships with colleagues in the virtual school which supports them to advocate for adopted children and their families as appropriate.

16. Support Groups

Support groups are facilitated for adoptive families and special guardians pre and post order.

Support groups for adopters are facilitated jointly by the adopter recruitment and post order support team and are open for adopters at all stages of their journey (following approval as suitable to adopt). Daytime groups are held monthly and have been re branded as ‘Adoption Stay and Play’ sessions as anecdotal feedback was indicating that the title ‘support group’ may be off putting for some who felt they didn’t need support but would want to have an opportunity to meet other adopters and for them to have a space for their children to meet.

Social workers facilitating the Stay and Play groups see the session as an opportunity to have informal discussions with families re their children’s presenting behaviours and offer advice re therapeutic parenting techniques which may support them and their child as well as an opportunity to revisit the adoption support offer available.



In recognition that not all adopters are able to attend daytime support groups the service also facilitates a monthly evening online support group. As with the stay and play sessions adopters are invited to attend from the point that they commence Stage 2 of their assessment process. The sessions have a broad discussion topic which is emailed out to adopters on the mailing list in advance of the group in order for them to make a decision to attend if particular topics are pertinent to them at any given point.

As well as being advised of the groups via their SW's, adopters are routinely invited by via the service mailing list and information is available on the NCT and FAL website All NCT VAA groups are open to adopters from FAL partner agencies and in addition there is a FAL online support group which adopters are able to attend.

Feedback from sessions is positive as demonstrated below –

'We enjoyed meeting others in the same position as ourselves and others who have had a child placed with them, in an informal social setting,'

Social activities including summer picnics and Christmas parties are also facilitated by the service supporting the ability for adoptive families to make connections with others informally and for adopted children to have the opportunity to get to know other children like them to support their sense of acceptance and self-esteem. In addition, the post order support team negotiated cut price tickets to a Christmas Light Show and a day at Wicksteed Park for adoptive and SGO families.

One family reported that;

'We particularly found the organised social events to be supportive and encouraging.'

Support groups are also held for SGO carers which mirror the offer outlined above for adopters, other than access to groups via FAL, and are facilitated solely by the post order support team.

Going forward the post adoption & SGO support team will have a supporting role in a coffee morning designed for kinship carers including Special Guardians, alongside the fostering service.



17. Training

Adopters are able to access a range of training pre and post order as detailed below, some of which is directly delivered by the service and some via other routes. As part of the Family Adoption Links partnership a programme of core training across the region has been developed which will be complimented by specific training or workshops on a local level in response to the needs of those accessing the service.

An overview of the FAL training offer can be found via the [2023 FAL What's On Calendar](#)– some training is delivered face to face e.g. the adoption preparation training and Early Permanence training whilst others are online. Adopters are able to book onto any courses via an Eventbrite system which is centrally managed by the FAL hub team.

Since the FAL programme was launched in July 2022 and up until the end of March 2023 NCT adopters accessed 170 training sessions on courses including;

- Non-Violent Resistance
- Foetal Alcohol Spectrum Disorder
- The Child's Sensory World
- Adopting Siblings
- Early Permanence
- Therapeutic Parenting
- Talking about Adoption
- Family and Friends Training



At a local level NCT adopters are also able to access training via the NCT ILearn programme and E-Learning training via the link below. During the 2022-2023 reporting period adopters attended 168 training sessions via this route. which includes courses relating to the following topics;

- An Introduction to Attachment
- Birth Parents in the Lifelong Adoption Journey
- Child Development
- Bitesize training Gangs & Knife Crime
- Identity
- First Aid
- Letterbox contact
- Separation and Loss
- Transracial Adoption
- Equality and Diversity
- Contextual Safeguarding
- Radicalisation
- Resilience and recovery

[Children Services Training Online - AC Education \(ac-education.co.uk\)](https://www.ac-education.co.uk)

Below is a sample of the feedback received from adopters attending training;

'The prepare to adopt training got me thinking more about the child being at the centre of adoption process. I will try and do this throughout the journey going forward as it's not just about my wants.'

'We gained a better understanding of a child's view from the prepare to adopt training. It was great thanks'

'We found the friends and family training really good. It will help us to support everyone when the child moves in with them.'

Therapeutic parenting training groups have also been established the details of which are within the post order support section of the report.



Below is an overview of the training and support groups available to adopters for the coming year.

Training /Support Groups Programmes	
20 April 2023	Stay and Play Group
26 April 2023 8-9pm	Online Support Group birth family time - Modernising our ideas around direct contact and letterbox with birth families.
18 May 2023	Stay and Play Group
31 May 2023 8-9pm	Online Support Group behaviour - Challenges & triumphs with behaviour issues
15 June 2023	Stay and Play Group
28 June 2023 8-9pm	Online Support Group - Exploitation and how we can do our best to protect our children
14 July 2023	Kinship Coffee Morning (SGO)
20 July 2023	Stay and Play Group
26 July 2023 8-9pm	Online Support Group - Therapeutic parenting
17 August 2023	Stay and Play Group
23 August 2023 8-9pm	Online Support Group - Self-care and family fun. Ideas for fun family times and holidays and keeping self-care alive in August!
20 September 2023 8-9pm	Online Support Group - School support - Challenges & triumphs with school issues
6 October 2023	Kinship Coffee Morning (SGO)
19 October 2023	Stay and Play Group
25 October 2023 8-9pm	Online Support Group - Facing fears and phobias
28 November 2023 8-9pm	Online Support Group - Letting birth family time letterbox families.
20 December 2023 8-9pm	Online Support Group - Managing the holidays, sharing ideas and common tricky moments and how to plan to succeed.
January 2024 8-9pm	Online Support Group: You're ok, I'm ok - Promoting good self esteem
21 March 2024	Stay and Play Group.
February 2024 8-9pm	Online Support Group: non-violent resistance parenting. Dealing with loss and grief.
March 2024 8-9pm	Online Support Group: looking after adult relationships /Your adult relationships and how to care for them.



18. Financial Support

Within the service there is a finance officer whose role it is to undertake annual reviews of financial support allowances and set up new allowances once agreed for both adoption and SGO families.

749 financial allowances

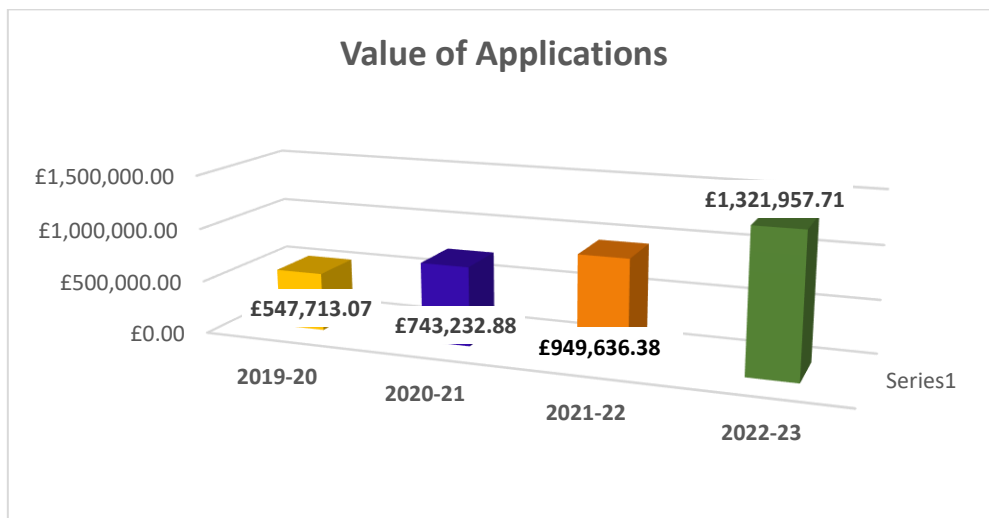
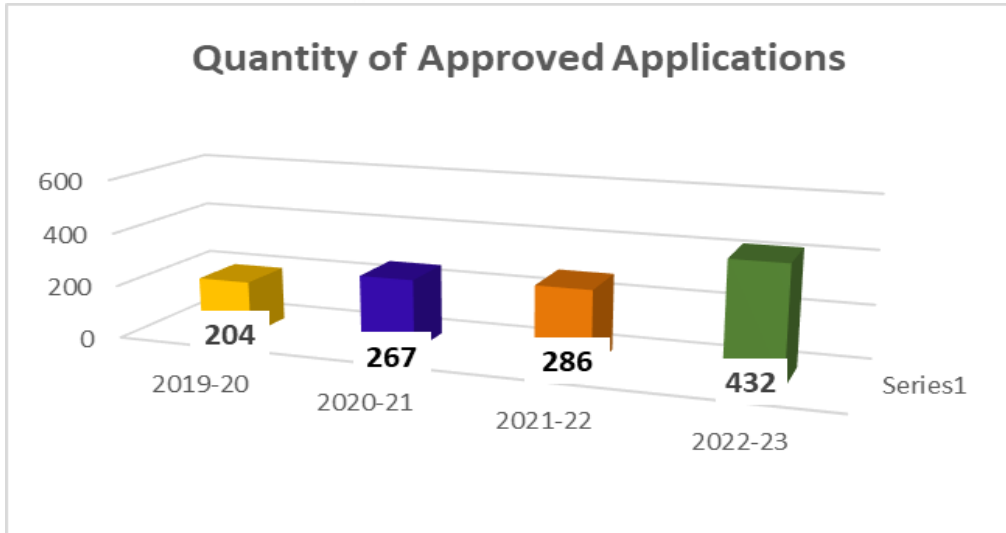
There are currently 749 financial allowances being paid to carers and there have been 37 new allowances awarded during the 2022-2023 reporting period. Adoption support allowances are not common with only 76 out of the total 668 allowances being paid to adoptive families. Allowances are normally offered for a time limited period either at the start of an adoption or as a result of an assessment of need where a family experiences additional financial pressure relating from the needs of their child. All allowances are subject to an annual review.

The SGO financial support policy was reviewed and updated in November 2022.

19. Adoption Support Fund

432 Applications to Adoption Support Fund

The provision of post order support for both adoption and SGO families is enhanced by the use of the Adoption Support Fund (ASF). During this reporting period the service made 432 applications to the adoption support fund resulting in the provision of over £1.3m of funding for specialist therapeutic interventions to support children, young people and their families. The charts below indicate a rise in both applications to the ASF and the allocation of funding compared to the previous three reporting periods.



As a high user of the ASF the service was invited to take part in the ASF outcomes pilot which commenced in January 2022. Independent evaluation and feedback from the adoption sector indicates that the provision of funding for therapeutic services is having a positive effect however there is not a systematic way of measuring outcomes from ASF funded therapy. The outcome measures pilot aims to support the development of the ASF and improve the overall understanding of what works and also.

- Improve agency's ability to deliver the right support offer to children a families
- Inform which therapies work best for children and families
- Enable services to have data to inform their commissioning



The outcome measures pilot reported on its findings at the end of 2022, which concluded that a national rollout of the Outcome Measures Project will be incorporate into all ASF activities in the coming years, and we expect this to begin in June 2023. As a service we are in a very strong position to participate in this due to the involvement that we had in the pilot project.

20. Adoption Support Newsletter

As a partner agency of Family Adoption Links the VAA co produce a quarterly newsletter called 'Thrive' which can be emailed via the service mailing list or downloaded by adopters via the website. The newsletter provides information in relation to training, social events articles, and ideas for adoptive families. In March 2023 900 adopters across the FAL partnership received the online newsletter and there was an opening rate of 59.4%.

21. Birth Family Support



During the 2022-2023 reporting period the service received 33 referrals from birth family members requesting support in relation to the children being adopted or placed in a special guardianship arrangement. Below is an example of feedback from those accessing this service.

'(Counsellor) has helped me immensely, she has helped me separate my feelings/emotions into what I can deal with now and in future. She is kind understanding and has huge knowledge of many things. I feel more settled in myself and parenting than I have at any point before.'

Links have been developed by the service with the PAUSE project and as a result the adoption service manager is a member of the PAUSE strategic partnership board and work is being finalised to develop links with the project to gain the views of birth mothers in relation to what support services, they may find useful. The service would like to develop this work with an aim of making a video with birth mothers to share at adopter training to support adopters understanding of birth parents' situations and the significance of their ongoing role in adopted children's lives.



22. Post Order Contact



619 Letterbox Exchanges

There is a dedicated letterbox co-ordinator within the post order service who manages post order contact arrangements for both adoption and SGO families, during the 2022-2023 reporting period there have been **619** exchanges of letters, cards and photos between birth and adoptive families. The letter box coordinator is also central, due to the relationships built with birth parents, in exploring introducing direct contact where either birth family or adoptive family are seeking to establish this and mediates to consider these possibilities, alongside social workers from the service.

We have supported 8 direct family time sessions during this reporting period a family support worker within the team is engaged in assisting families to make agreements and facilitate meetings. This is an area of work we plan to develop in the coming year in line with the modernising adoption agenda and the importance of supporting children and young people to develop a sense of their identity and maintain significant relationships. Post order contact plans are routinely discussed during permanence planning meetings to support with the development of care plans reflecting the lifelong needs of adopted children.

The Adoption UK Adoption Barometer report published in June 2022 reporting the following from the online survey completed as part of the information gathering process;

- 70% of prospective adopters believe direct contact should be standard for adopted children as long as it is deemed safe
- 69% of adopted adults who did not have childhood direct contact regretted not having the opportunity
- 80% of adopted adults and 88% of adoptive parents who were involved in direct contact during childhood were glad they had participated

As a service we recognise and value the ongoing importance that birth family members have in relation to children placed for adoption or cared for via special guardianship arrangements in respect of supporting the child's sense of self and their identity. We are committed to developing the services we provide to support contact arrangements including direct contact. This includes the need to discuss plans for children during permanency planning meetings and by asking professionally curious questions during tracking panels and Child in Care reviews and when necessary, challenging the notion of risk often associated with post order contact.



Below is feedback from those who have been supported by the service, in face-to-face family time:

“(worker) has been like a breath of fresh air and she really has supported me not just with arranging contact but also while we are at contact. (worker) has been amazing and very supportive and helpful during and in between visits.”

23.Support to Adopted Adults

Supported 141
Adopted
Adults

Within the service there is a coordinator and social worker who support adults who have been adopted who live in Northamptonshire to locate and access their records. These records can be paper or electronic and can be from last year or as long ago as the 1930/40’s.

Finding their records enables adopted adults to learn details about their early life that may have eluded them for many years and to resolve worries and questions that they may never have even shared with anyone. Where appropriate the service will offer advice and signpost people in relation to how to trace and locate their birth family and this is a life changing event for many who thought they would be lost to each other forever.

During the 2022-2023 reporting period the service has supported 141 adopted adults to access their birth records compared to 90 in the 2021/22 reporting period.

Below is an example of feedback received from an adopted adult:

“It was a wonderfully endearing experience to read through such detailed and well logged work over all those years. I learnt so much about myself and lots of memories came flooding back, both good and bad. I think I have got some kind of closure from the documents, which was like being handed your past on paper. I really enjoyed it. Thanks so much for your help”



24. Summary

The service has continued to have a successful year in terms of adopter recruitment, matching for children and supporting families post order. During the 2022/23 reporting period the service has taken the opportunity to *take stock* and review practice across the teams. Work following the Leiland James Corkhill safeguarding practice review has strengthened practice which will support the ability of the service to safeguard children throughout their adoption journey.

The partnership with Family Adoption Links (FAL) is now embedded and is bringing benefits in terms of a broader training and support offer for families and in terms of supporting family finding for children across the partnership.

As a service we remain aspirational in terms of our vision for an *Effective Adoption Agency in the 21st Century* and as such recognise that whilst it is important to continually monitor the effectiveness of our locally and regionally delivered services It is equally as important to maintain an outward facing awareness and response to national drivers, reports and research and consider the implications of this upon local practice development.

In July 2021 the Department for Education published the *Adoption Strategy – Achieving Excellence Everywhere*. The strategy set an expectation to strive for excellence in all adoption services meeting the needs of every child waiting for adoption and for all adopted children who need support. Whilst this strategy was published in 2021 the aspirations outlined within it remain the focus of work being undertaken at a national, regional, and local level as it continues to mirror the vision which we have as a service.

In June 2022 Adoption UK published its annual Adoption Barometer report, below is a summary of the recommendations made;

- Create and implement quality standards for the journey of prospective adopters through preparation, approvals and matching, for use by all adoption agencies.
- Introduced ringfenced, multi-year government funding for adoption support across all nations of the UK.
- Produce clear, specific support plans for every child to be placed for adoption, distinct from the placement plan, agreed with their adopters and reviewed at least once a year.
- Adoption agencies to have a duty to provide the adoption support set out in a child's assessment of support needs.
- Train education and health professionals in early childhood trauma and associated conditions, including Foetal Alcohol Spectrum Disorder and Attachment Disorder.



- Provide free, expert, lifelong support for establishing and maintaining birth family relationships including during childhood and when tracing birth relatives in adulthood

These recommendations are aspirational and far reaching in terms of considering adoption within the wider societal context. As a service whilst we cannot address all the recommendations, we are mindful of them within our day-to-day practice and service planning and are mindful that these are recommendations borne out of feedback gathered from adopters, adopted young people, adopted adults, birth parents and professionals across the sector. As such we have a responsibility to view this as we would other forms of feedback. In response, as part of our review of service areas during the 2022/23 reporting period we have:

- Strengthened our QA process in relation to support plans to ensure they are reflective of the child's needs,
- Maintained links with education and health partners and share information and training opportunities with them to support attachment aware practice
- Held workshops with education colleagues re Supporting the attachment needs of children in schools, and education passport is being developed via the FAL adoption support work stream
- Made a commitment to applying for the Early Permanence Quality Mark which is underpinned by an agreed set of nationally agreed practice standards.
- Established links with the PAUSE project to support our understanding in relation to what birth families would find useful in terms of support services including support with post order contact arrangements.
- Developed training workshops re managing attachment needs which can be delivered to staff across residential children's settings.

Overall, we feel we have had a positive year across the service and whilst we are all saddened by the adoption disruptions, we have experienced we have used these as opportunities for review and reflection of practice and as such continue to strive for excellence in all that we do.



18. Plans for development 2023/24

The service has a strong foundation of good practice upon which to continue to develop during the 2023 – 2024 reporting period and have identified the following priority areas.

1. Continued development of tracking systems including embedding the adoption tracking panel to support oversight and planning for children alongside effective tracking of adopters to ensure that matches for children are made in a timely manner.
2. Tracking and data collection systems to be developed for the post order support team.
3. Strengthened quality assurance systems including an audit framework to be embedded within the service.
4. Awareness raising activities and training in relation to the benefits and challenges of direct contact in adoption to be established for adopters, SW's and panel members.
5. Feedback mechanisms for service users to be embedded and feedback used to inform practice developments and co-production – including feedback from the Adopter Consultation Hub and Colabor8 groups.
6. Early Permanence Quality Mark to be applied for.
7. Share learning from recent disruptions to inform practice across the service including with the adoption panel and the wider children's trust teams.
8. Developing an Adoption Community to support adopters and adopted children and young people to have a network where that can share experiences and links with others who share an *adoption identity*.

Tracy Morton

Adoption Service Manager

April 2023



**Northamptonshire
Children's Trust**

Independent Reviewing Officer Service - Annual Report 2022/2023



**Safeguarding and Quality Assurance Service
Northamptonshire Children's Trust**

Date Published as final version – 22.06.23

Authors: Mikesch Kotak & Gerry Vaughan – IRO Service Managers

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Introduction

The Independent Reviewing Officer (IRO) Annual Report is a requirement set out in the IRO Handbook (2010). It is directed that the report should be written in a format which is easily accessible to children and young people who live in care.

This report contains a summary of work completed by Northamptonshire Children's Trust's (NCT) Independent Reviewing Officer service between 1st April 2022 and 31st March 2023.

It is the duty of NCT, commissioned by the respective unitary Authorities (North Northamptonshire and West Northamptonshire Councils) to act as corporate parents for all our Children in Care and, as any good parent, it is our duty to ensure that our children and young people are safe, healthy, supported to do well in education, employment & training and are helped to transition smoothly into adulthood.

NCT's vision is **Children, Young People and Families are at the heart of all we do, in every action we take and every decision we make.** Our commitment, which was co-produced with children and young people is:

'What we do today affects your tomorrow, we promise to walk side-by-side with you.'

The Role of the Independent Reviewing Officer

The appointment of an Independent Reviewing Officer (IRO) for a child or young person in the care of a Local Authority is a legal requirement under s.118 of the Adoption and Children Act (2002).

The role of the IRO is set out in Care Planning Regulations and Guidance (2010) and Children Act (1989). The Children and Young Persons Act (2008) extended the remit

of IROs from a focus on chairing reviews to reporting on Local Authority's performance in respect of the wider case management of children's Care Plans.

Detailed guidance and regulations for Independent Reviewing Officers and Local Authorities was published in 2010 as the 'IRO Handbook'. In this, it states that the primary role of the IRO is 'To ensure that the Care Plan for the child fully reflects the child's current needs and that the actions set out in the plan are consistent with the Local Authority's legal responsibilities towards the child'.

A guide to help children and young people to understand the role of the IRO has been developed and can be found at the following link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221761/young_20peoples_20guide_20to_20the_20independent_20reviewing_20officers_20handbook.pdf

In this guide it states that: -

- *The main job of the IRO is to make sure that your care plan meets your needs.*
- *They will do this by first, chairing your review, second, by letting you have your own say in your review and third, by following up to make sure that people actually do what they agreed to do.*

Children and young people are reminded that Children in Care Review belong to the young person, and it is essential that the IRO knows how and what they feel.

Furthermore, the IRO Handbook states that IROs must: -

- promote the voice of the child;
- ensure that plans are based on a full and proper assessment of each child's needs;
- make sure that each child knows how they can get hold of an Advocate;
- act as a safeguard against children staying in care longer than necessary, or not getting the services they need, because of a lack of good planning;

- listen to children and see that they understand any changes to their Care Plan and
- make sure that the Local Authority is a good “corporate parent” to children in care

The IRO Service

The IRO Service is part of the Safeguarding and Quality Assurance Service (SQAS) within Northamptonshire Children’s Trust. The service comprises of 19 IROs (16 full-time, 3 part-time) 84% is female, and 26% are global majority identity. The service is managed with the support of an Assistant Director, Strategic Manager and two IRO Service Managers; all of whom are permanent members of the service. There is an extensive range of experience in the team, with IROs who have experience in youth justice, fostering, adoption, kinship fostering, children in care, safeguarding (child protection), mental health, separated children (unaccompanied asylum-seeking children - UASC), children with disabilities, substance misuse services and CAFCASS. Five IROs are designated Signs of Safety champions. The service continues to be supported by a dedicated business support team, without which, the service would struggle to function effectively.

The IRO Service is a separate service to the Child Protection Chair Service, which is supported by 10 Child Protection Chairs (CPC’s) and a Service Manager. Having a separate service enables IROs to focus solely on the needs of our children and young people who are in care and ensure they receive good quality services in line with the IRO Handbook and Care Planning Regulations. Whilst CPC and IRO Services are separate, some officers are recruited as joint IROs and CPC’s, enabling services to be flexible to meet the needs and demands placed on either service area.

The IRO Service, whilst employed by NCT, is an independent service whose functions include ensuring that NCT meets the needs of Children in Care, monitoring the performance of the Trust’s function as a corporate parent and to identify areas of

practice that require improvement. As a service, we take the view that having a positive, collaborative working relationship approach, whilst remaining a critical friend to our colleagues, is more effective to work towards best outcomes for our children and young people. The service also recognises the importance of acknowledging and highlighting good practice that Social Workers evidence and the positive impact this has on children. IROs regularly praise Social Workers, share good practice, and bring positive work to the attention of senior leaders, including the Chief Executive of the Trust, who acknowledges each contact personally.

IRO caseload (number of children and young people they should work with)

1. The IRO handbook recommends a caseload between 50 to 70 children and young people per IRO. Ofsted (2013), *Independent reviewing officers: taking up the challenge?* A thematic inspection of IRO services states 'although a lower caseload was not a guarantee of high-quality work, IRO input was likely to be more effective where caseloads were manageable'
2. The number of cases held by individual IROs has varied and has, at times, risen above 80 cases. Individual caseloads have ranged from 40 (part-time staff) to 84 cases per IRO during the reporting period. At the end of the reporting period (31st March 2022) the average caseload was 71; however, this included the 2 Service Managers managing small caseloads due to the increasing numbers of children coming into care and IRO absence (long-term sickness and maternity leave). This resulted in IROs also having to cover for colleagues, and this is not reflected in the average caseload data.
3. Size of caseload does not always provide an accurate picture of the volume of work for an individual IRO. It does not account for additional reviews due to placement breakdown or disruption, additional visits to children - prior to, or between reviews, children in out-of-county placements or large sibling groups.

Progress made April 2022 to Mar 2023

The IRO Service continues to be a permanent staff group. This year saw some changes in the staff group, with four new IROs joining the service because IROs retired, went on maternity leave, moved to an Auditor role and creation of new post from existing hours using hours 'released' when IRO's chose to reduce hours and work part-time. The team has remained stable, with 50% of the team engaged in their IRO role for more than 5 years and 5 IROs with over 8 years' service. This has resulted in our children and young people benefitting from someone consistent in their life, and with whom they can build a positive, stable relationship. This is vital at a time when some children in care have experienced higher than desirable changes of Social Worker. The IRO has been able to be the constant and therefore able to ensure that the child's assessed needs are met and regularly revisited as part of the care planning and review process.

The last year has seen the IRO service being able to fully return to in-person reviews, following the conclusion of Covid concerns. IROs comment that they continue to value this position and they are able to visit children and young people in their homes and engage with them in-person. Some young people have continued to request that visits take place virtually, as they find this way of communicating more engaging and less formal; similarly, reviews now benefit from learning gained during Covid to enable i.e. face to face, virtual and hybrid meetings, as agreed / directed by the young person. As a service we have agreed that all first and second reviews are ideally in person and face to face in order to start to build that important relationship with the children and young people.

IROs rightly believe that active participation of children and young people in their review is critical. IROs continue to prioritise and support children and young people to share their views and be part of their review in a range of ways - from attending face-to-face or virtually, writing their views for their review, having an Advocate support them to share their wishes and feelings, and supporting children to chair their own reviews.

IROs have made effective use of a range of approaches to engage with young people, using various IT platforms. In the last year there was a 15% increase to 54% of children and young people attending their review compared to last year. Overall, 82% of children and young people were able to either attend or share their views with the IRO prior to, or at their review enabling the young person's voice to be more clearly heard and enabling them to actively partake in the decision-making about their life

IROs continue to work closely with CAFCASS, holding 2 joint meetings / workshops last year. Joint IRO / CAFCASS Guardian workshops allow both services to develop good practice and to share concerns relating to cases, consider Family Proceedings Court practice and Deprivation of Liberty Orders (DOLS) and to share developments within services. IROs continue to attend regional IRO seminars to develop their practice and the service provided to children and young people through learning from other authorities.

IROs continue to write their Chair's report directly to the child or young person - subject to the young person's age and understanding and this includes a summary letter to all children / young people regarding their review meeting. The young person has a choice of receiving the full report, summary letter, or both. Over the last year we have had 1½ service development days and writing to the child has been discussed and good practice shared to further progress this practice and to act as role models across the Trust. (See appendix A).

IROs continue to raise formal and informal escalations on individual cases when there is a significant impact for a child. Alongside the daily report, the service creates a quarterly report highlighting team performance and themes raised. Key findings from this process are shared with senior managers in a quarterly report to the Quality Assurance Board. The report is available to operational Service Managers and themes are addressed in regular Service Managers' meetings, the latter is chaired by IRO Service Managers; these meetings have become better attended and more focussed during the last year.

Children and young people have fed back to IROs that they continue to find having one-page profiles (see appendix B) beneficial and this assists in making the first meeting more informal. IROs continue to update and send their one-page profiles to children and young people prior to their first review and new IROs are required to complete their profile upon appointment.

Examples of challenges by IROs: -

- An IRO raised concerns about the quality, safety, and cleanliness of a placement and this resulted in 5 young people being moved into appropriate accommodation.
- When a young person had photos taken and they were published in the local paper or on the school website, they put an emoji over her face as a standard risk averse response for children who are in care rather than a risk managed approach which the IRO was able to support. The IRO then agreed to advocate that her face be shown - which was in line with her views and wishes.
- IROs attendance at final care planning meetings and challenge to the proposed plan where the IRO has assessed this to not be in the best interests of the child/children - for example, a plan for 4 siblings was to be 2 separate plans: adoption for the younger siblings and long-term fostering for the older siblings. Following challenge, this was changed to a plan of long-term fostering for all 4 children, where very regular family time could be supported into their futures.
- IRO supported 2 young brothers to present their concerns regarding their sleeping space and the need for an urgent extension (previously agreed, but not actioned) to the Chief Executive and the Director of Children's Social Care. An extension to this property is now progressing.
- IRO raised concerns regarding a CPR (Child's Permanency Report) for a child where there had been no management oversight or quality assurance checks and the work was of an unacceptable level - this has been addressed and now reflects the child's history.
- IRO raised concerns regarding a lack of school place for a young person living out-of-county. As the IRO and Social Worker did not get a response through the escalation process, the IRO made a formal complaint using the Local Authority's complaint's process where the young person was placed, and this resulted in instant resolution of the issue.

Example of compliments for IROs: The work and support of IRO's has been appreciated by many children and young people, parents, carers, and professionals.

Please see below for some examples of this: -

Foster carers shared... The IRO was absolutely superb and a key driver in ensuring A and B's voice was heard. It would be excellent to have him involved again.

Fostering Social Worker shared... We just wanted to say thank you for all your support. You are excellent at coordinating these meetings, ensuring clear actions and accountabilities are taken.

Parent shared.. *"I just want to say thank you to you and A for everything your kind words and support.. I know your jobs not easy just like social services but I want you guys to know I appreciate what you all do and very lucky to have had two very supportive people. It helped me see what is right and the importance of parenting and help me see I am a great mum people can change and I'm not worthless i am strong and to know my kids will grow up with happy memories makes me happy. So thank you both very much".*

Parent shared.. *"Thank you so much i want you to know you have been a very active and positive part in my struggles as a parent I'm really grateful for your help guidance and I have learned so much about myself it's daunting but I'm glad I want you to know you are amazing at your job you will be missed also sorry if I've been hard work I never meant to be it's my of trying to say thank you for everything you have done for me and my family on after what happens next you deserve our gratitude and more there are not many people like you who are open to understanding You will be missed and remembered Thank you so much for everything*



Foster carer shared this after the review about the IRO... I just wanted to write a few lines to praise her as we thought she was really professional and a great advocate for our children. She was no nonsense and was not worried about talking about the difficult subjects that needed discussing, doing it in a caring but respectful way. It was a pleasure working with her and we hope to again, people are always to ready to complain so I wanted to praise instead.

Practice manager shared: She has gone above and beyond in her role as IRO with one of our families. She has been available when the carer has called and been reassuring to her. She has been extremely supportive of the family who sing her praises highly.



SSW shared ...she was talking with the young person B. And she talked about several social workers and other professionals in her life since she and her siblings were subject to care proceedings in 2015-16. B named the IRO as the only professional who really shows an interest in her life, takes time to listen to her views and try to support her. I also have observed the same during reviews where the IRO's approach was child centred and encouraging the YP to voice her views. The IRO has also emailed us to chase the actions as part for planning for next review. The organisation, communication and attention to detail are few skills to mention. There was always response the same day when the IRO was copied into emails and prioritised attending a professional's meeting organised at short notice.

Family time supervisor...Just a short note to say that I have just read the CIC notes you put on FB's Care First observations and, I have to say, it is one of the BEST I have ever read! I am sure that people are quick enough to complain about things but not many speak up to say a "Well done" do they? I think its beautifully written, for FB to read when he is older if he chooses to – very sensitive to his situation and careful consideration on the way it was written in the style of "writing to the child" - its also informative for other professionals involved in this child's life. So, a big Thank You from little old me 😊 tell your Boss I said so too

A compliment from an adoptive placement breakdown parent where there has been a really challenging journey. *Just wanting to say thanks again for all your hard work and keeping him, ooh making sure he's become the lovely young wonderful lad that he has. Thanks for being there for him and for us, we've met very few of those people on our adoption journey and we really really appreciate it. Take care Bye bye*

From April 2022 – March 2023, 3036 Children in Care reviews took place:

The timeliness of the first Children in Care review in 2022/23 was 83%. Delays occurred as result of IROs changing dates in the best interest of young people, following changes of Social Workers, late notification of children entering care, and, in some cases, unavoidable delay caused by IRO sickness absence. The percentage of second reviews on time was 88% and subsequent reviews was 93%. Some reviews were out-of-timescales through IRO sickness, and it was not considered in the best interests of the young person to allocate to another IRO to meet performance targets. Other reasons include changes of Social Workers, delaying reviews to enable a Social Worker to attend Court, to enable parental attendance and, in some cases, so that young people could attend the review.

The table below show timeliness of completion for IRO decisions and recommendations reports for year ending March 2023. The figure is taken from the reporting system. The 'actual' figure relates to data which has been corrected to consider human data entry errors which, in the report, shows as 'missing' and is recorded by the data entry system as being out-of-timescale. Unfortunately, this year the 95% target for chair reports was not achieved as result of unexpected long-term sickness and maternity leave.

Report type (Target 95%)	Reported Figure	Actual Figure
Decisions	83%	96%
Chair's Review Report	78%	86%

The following priorities were highlighted in the 2022 / 23 IRO Annual Report (**What we said / What we did**): -

- Ensure that the voice of the child / young person continues to be central to care planning for all our young people and is supported and evidenced by greater use of the Mind of My Own App to record and represent their wishes and views for children in care reviews.
 - IROs received training on the use of the Mind of my Own App and IROs have encouraged young people to use the App to provide feedback and their views and wishes for their reviews. Many of the children and young people have however shared that they are not happy to download and use this and prefer to talk with their IRO and use feedback forms.
- Ensure the Care Plan / Pathway Plan holistically explores and identifies each child and young person's needs, particularly focusing on children and young people's cultural and diversity needs.

- IROs have attended cultural competence training and have also taken part in bespoke training focussing on the role of the IRO and CP Chairs; this training included a focus on care planning and diversity.
 - There are now 2 equality influencers in the IRO service.
 - Team meetings now have a monthly focussed discussion regarding any individual needs to be considered in care and pathway planning, with a specific focus on equality and diversity.
- Continue to develop our practice of writing reports and summary letters to children and young people to ensure this becomes consistent across the service.
 - This has been consistently implemented across the service, including with new IROs who have joined the team.
 - An IRO has developed a training course about “Writing to the Child” with the Learning and Development team and some IROs have been able to attend this for their development.
- Work with our colleagues in NCT by facilitating monthly Service Managers’ meetings, with the aim of sharing good practice and identifying areas of concern so we can develop joint plans to address these.
 - This has been progressed and these meetings now take place bi-monthly. There has been good attendance across the Children’s Trust to work together at this level.
- Progress monthly quality assurance meetings to review themes identified through escalations and standing team agenda items regarding policy, procedural, and practice concerns. This will be supported by developing action plans to address matters identified with peers in NCT.
 - This has been progressed as a standing agenda item in the Service Managers’ meetings and through bi-monthly meetings with the Children in Care Strategic Manager.
 - Service Improvement plans have been updated to address these issues.
 - This was an area reviewed in an IRO development day, where themes and concerns were identified which will inform the IRO service development plan.
- Support and encourage IROs to fully evidence the direct and indirect contact they have with children and young people and their families.
 - We continue to monitor this and have tried to support this through making changes to the Chair’s report; unfortunately, the IT system could

not support this change and we await the new system to be able to progress this further.

Children in Care population

The number of children in care has continued to rise from 1185 in care at the end March 2022 compared to 1226 at the end of March 2023. (A more detailed breakdown is found at Appendix C).

Priorities for 2023/24

As a service we have identified the following priorities for the year April 2023 to March 2024:

- Ensure children and young people's voices are heard by updating our consultation forms to make them more age-appropriate and accessible, whilst concurrently supporting them to use the Mind of My Own app. Further surveys to be undertaken by the Independent Advocates on themes to be agreed with the IROs and Children in Care Council.
- To continue to focus and improve evidencing our understanding of each child's unique diversity. Service Managers to undertake observations and case audits to assess context and substantive practice in this area.
- All IROs to attend Cultural Competence and Writing to the Child training.
- To develop the role of the link IRO with respective children's teams across the Trust and to build effective working relationships which will enhance the lives of all our children and young people. Services from across the trust will be invited to the IRO Team Meeting to share and develop our understanding of the full range of roles across the Children's Trust.
- To positively reflect upon our learning in our work with children and young people and use appreciative inquiries to facilitate this and further development days.
- To ensure IROs understand their role within the developing Child Exploitation framework.

- IROs to ensure that Care Plans identify the clear route to permanency by the second children in care review
- Where IROs identify a concern that has a significant impact on the Child/Young Person's Care Plan they will address these issues consistently using the dispute resolution process.

Overview and Summary

The last year saw an increase in the number of children and young people coming into care. As a result, caseloads for IROs have remained over the recommended amount outlined in the IRO Handbook. IROs have continued to increase the number of in-person reviews and enabled young people to make an active choice if they prefer hybrid or virtual meetings. Performance this year has not been as consistent as we would have hoped for, but we have had significant illness and loss in the team, alongside the return to more face-to-face work – with associated time lost from travel-time.

The service continues to work in collaboration with NCT colleagues to acknowledge areas of good practice and highlight areas that require improvement. The service has welcomed four new IROs to the team in the last year. The service continues to benefit from having a stable and permanent workforce, who are committed to being the best advocates they can be for the children and young people in our care.

Appendix A: Writing to the child examples:

Child in care review Summary provided to young child:

Hello A, My name is B(IRO) and I am your independent reviewing officer. At the time of writing this report you are nearly 5 months old and whilst I appreciate you are too young to understand the current circumstances and offer your views, wishes and feelings, I wanted to write this record should you wish to read this when you are older, in hope this record will support your understanding of the meeting and decisions agreed in your best interest. My role as your independent reviewing officer is to oversee your care plan and what I mean by care plan is a document that considers your safety and wellbeing, ensuring your needs are adequately met in the environment where you live, your health, education, identity and family time. Today is your second child in care review. A, I can confirm that your current care plan is a twin track plan and what I mean by a twin track plan is consideration for your longer term care needs to be met and for you to be cared for with your family or with connected other and if this option is not deemed a in ensuring your needs are consistently whilst ensuring your safely and wellbeing, as a last option a plan of adoption for you to be cared for outside of your family will be considered. A, you have a new social worker named C and she shared in the review that despite her best efforts she has not been able to consistently engage with your mum to complete the parenting assessment, and due to non engagement, the assessment is negative which means your social worker is not recommending a return of you to mums care at this time. Mum is understandably upset receiving this news and has shared in the meeting today that a number of personal circumstances have impacted her engagement. C and myself and have urged your mum to speak with her legal representative to seek an extension and to do this as a matter of importance for the court to consider. A, your mum has put forward your great maternal uncle to be assessed as a possibility to care for you long term. Your social worker is going to complete an assessment as part of parallel planning. C aims to have the initial viability screening assessment completed within the week and if positive this will progress to a more in-depth assessment called a Connected Person Assessment. In the review A, your foster carer proudly shared updates about your progress. Your foster carer (FC) often shares pictures of you on various outings and you have the most precious smile that lights up your face. FC explained that you are gaining weight steadily and that this has been supported with a change in milk which appear to have eased your symptoms of reflux. A you are now provided Kendamil milk and this replaced Cow and Gate, you take 5-6oz every bottle and you are having feeds every 4 hours. At the time of writing you are 6.7kilo. Your health visitor has completed your 4.5 month development review and you are meeting your age expected milestones, which is fantastic. FC has shared that in the last 3 months, you have accompanied them on various trips and outings such as visiting a new country of Scotland, going to Butlins and you enjoy going out in your pram in the community exploring, taking in your surrounding. FC described you are becoming more active and personable each day and that you are an absolute delight to care for. Next steps, in respect of your care plan A, is C will complete the assessment of your great maternal uncle and mum will explore if she can obtain an extension to engage with C as part of her assessment. Whilst all of the assessments are being undertaken, you will continue to be cared for by your foster carers who love and value you greatly. I have set another date to review your care plan for 6 months 26/06/2023. Your IRO

Dear

This was your first child in care review, following you becoming looked after. You left the hospital following your premature birth at 19 days old and moved straight to the care of J, following the granting of an Interim Care Order by the Court on the same day. An assessment of mummy is being completed to see if she is able to care for you in the future and given she has not put anyone else's names forward, twin tracking has been agreed. This means that in the future you will either return to mummy's care or permanence will be achieved for you by way of adoption. This decision is not taken lightly and your social worker will work with everyone to ensure the wise Judge in Court is given all the information to make a forever decision for you. social worker agreed to finalise your My Care Plan within 10 days of your review, that being 08/06/23 and this is to be shared with mummy and daddy on completion. I was pleased to hear you have settled well into J's care and your development is evident, which was agreed by everyone in your review including you mummy. A great photo was shared with everyone of you in your swimming costume, we all joked that by your next review in 3 months time you will have hopefully grown into it! I'm so looking forward to seeing your development over the next few months and I look forward to visiting you again before your next review on 08/08/23. Best wishes

Appendix B: One-page profiles of 2 new IROs

Hi! My name is Nina Loyal.
Here is some information about me...



What makes me happy?

Helping others to have a good and happy life.
Seeing people being treated fairly and with respect.
Performing random acts of kindness whenever I can.
Knowing that people I care about are doing well.
Relaxing at home with absolutely no chores left to do!
Eating chocolate and ice-cream (a little bit too much!)

Things people like about me

I am always truthful, thoughtful and kind.
People have told me that I am good at listening and helping.
I speak up when I see that things are not right or unfair. I think that usually people need to know more about a situation so they can understand others better.
I look at the whole story before having an opinion about something.

I might feel sad when

People being negatively judged. For example because of their skin colour, language, heritage, ability, gender, mental health and other things about them or their situation.
The people I care about are unhappy or unwell.
Something unfair or unkind is happening.

As an IRO, it is my job to make sure that :-

- your care plan meets your needs and is based on a proper assessment of these.
 - decisions taken are ones that are best for you, follow your care plan and respect your rights.
 - I know how you feel and what you want to happen.
 - you know how to get hold of an advocate
 - plans for you are made as quickly as possible so you can feel settled in your home.
 - everyone is doing what they should be and within the time agreed.
 - you feel able to attend your review meeting and be in charge of it with me if you are comfortable to.
- There is much more to what I do but I can tell you about that when we meet.

I need a little help with

Hearing things well.
To make things easier, I often wear hearing aids.
It helps if people speak clearly and look at me when they are talking.
It helps me to 'hear' more clearly if I see facial expressions and lip movements as well as the words being spoken.

I am really looking forward to meeting you
and getting to know more about you 😊



My name is Liz White. I am an IRO (Independent Reviewing Officer), and this is my 1-page profile!



What makes me happy?

Getting to know People and learning about their experiences

Listening to music and going to festivals

Watching films and Netflix series and Anime

Exercising, if I'm not eating chocolates and food

Knowing that I listen to the young people I work with, and support them the best I can



Things people like about me

I am friendly, and easy to talk to

I am always kind to people

That I always do my best to help people

I might feel sad when

When the young people I support are not happy, and feel that their voice is not being heard

I need a little help with

Getting to know you, and your journey. How are you feeling about coming a child, young person in care?

Who are the people most important to you? and how they can support you

What IROs do – My job is to make sure that YOUR Care Plan meets your needs.

These are **your** reviews, so it is very important that you make sure I know how you feel and what you would want to happen. This includes letting me or your social worker know who you want to come to your meeting and where you would like to have your meeting. It could be where you are living, your school, Virtual meeting, our office or somewhere else you feel comfortable, but it must be a private place where no-one else can hear us.

- ❖ Ideally you will attend your review if suitable.
- ❖ If you want to, I will help you to chair your review meeting, if you feel you don't want to, I can chair the meeting, or we can do it together
- ❖ I will make sure you have your own say in your review; and
- ❖ After the meeting I will do my best to make sure that people do what they agreed to do during the meeting.
- ❖

There is more to what I do, but I can tell you about that when we meet.

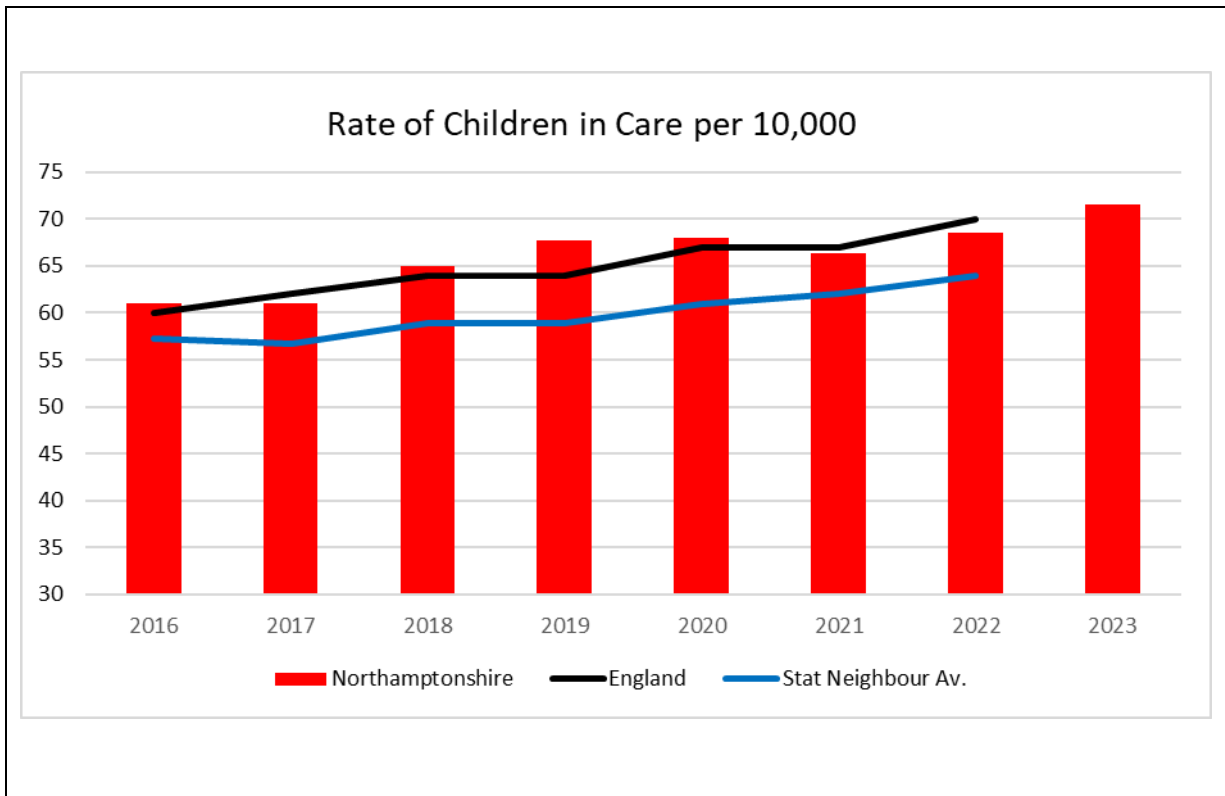
Appendix C - Children in care - data trends

Participation Data April 2022 to March 2023

Participation	0-3		4-6		7-9		10-15		16+		Grand Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
PN0 Under 4 at time of review2	527	99%	40	14%	32	10%	18	2%	11	1%	628
PN1 Attended spoke for her/himself	0	0	19	7%	43	13%	400	36%	510	64%	972
PN2 Attended spoke via an advocate	0	0	0	0%	1	0%	1	0%	6	1%	8
PN3 Attended used non verbal means	0	0	2	1%	0	0%	1	0%	2	0%	5
PN4 Attended did not convey views	0	0	4	1%	2	1%	6	1%	2	0%	14
Attended Total	527	99%	65	22%	78	24%	426	39%	531	67%	1627
PN5 Did not attend spoke via an advocate	0	0	13	4%	13	4%	32	3%	6	1%	64
PN6 Did not attend used other means	0	0	130	45%	158	49%	403	37%	114	14%	805
PN7 Did not attend did not convey views	0	0	57	20%	47	15%	145	13%	81	10%	330
Did not attend total	0	0	200	69%	218	68%	580	53%	201	25%	1199
Not recorded	3	1%	25	9%	26	8%	93	8%	63	8%	210
Grand Total	530		290		322		1099		795		3036

Participation	Grand Total
PN0 Under 4 at time of review2	628
PN1 Attended spoke for her/himself	972
PN2 Attended spoke via an advocate	8
PN3 Attended used non verbal means	5
PN4 Attended did not convey views	14
PN5 Did not attend spoke via an advocate	64
PN6 Did not attend used other means	805
PN7 Did not attend did not convey views	330
Not recorded	210
Grand Total	3036

Rate of Children in Care:



Commentary

The Northamptonshire child in care rate has steadily increased since 2016. At a rate of 71.6 per 10,000 head of population at the end of March 2023, it is above national (70). IROs continue, together with Children in Care team, to review cases of children who are having regular contact with family to assess if significant changes have been made that can enable children to safely return to the care of their family.

Gender of children and young people in care at End March 2023

	Male	%	Female	%	Total
2017/18	596	55%	488	45%	1084
2018/19	613	55%	502	45%	1115
2019/20	638	55%	525	45%	1163
2020/21	620	54%	523	46%	1143
2021/22	650	55%	536	45%	1185
2022/23	709	58%	517	42%	1226

Comparisons to National and Population statistics

Gender

	Northamptonshire 2023 (%)		England 2022 (%)	
	Children looked after	Population	Children looked after	Population
Male	58	51	56	51
Female	42	49	44	49
Commentary				
The above table shows that more boys than girls come into to care both locally and nationally compared girls.				

Ethnicity of children and young people in care at end March 2023

	All Children looked after %	Unaccompanied Asylum-Seeking Children %	Non-Unaccompanied Asylum-Seeking Children %
White	77%	6%	83%
Mixed	9%	1%	10%
Asian or Asian British	2%	20%	0%
Black or black British	7%	31%	4%
Other ethnic group	3%	24%	1%
Not stated			
Not recorded	4%	18%	2%

Comparisons to National and Population statistics

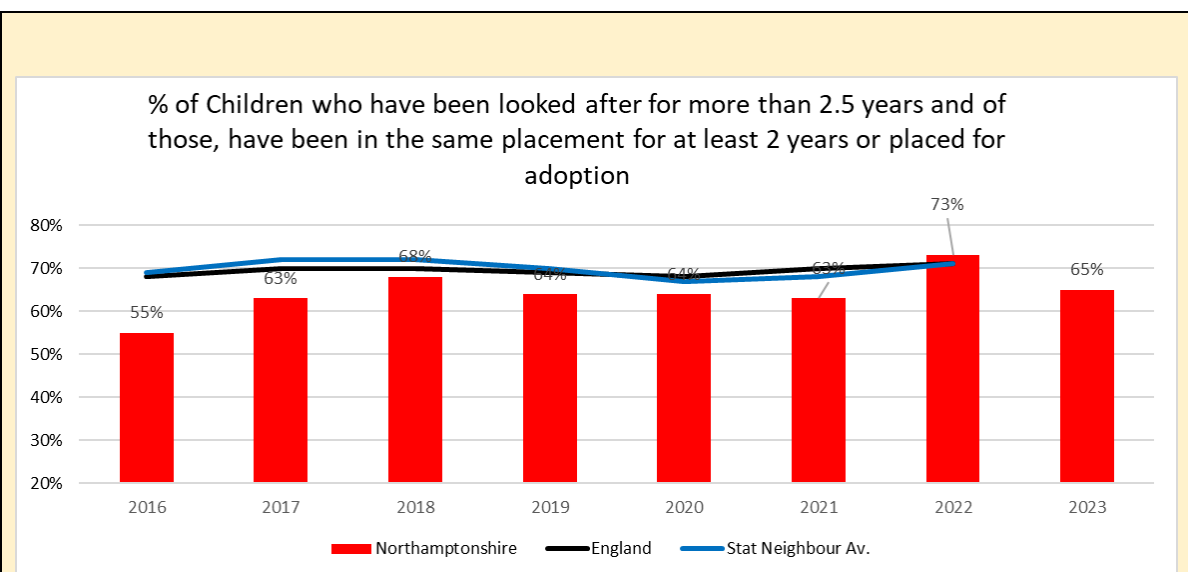
	Northamptonshire		England 2022	
	Children looked after %	Population %	Children looked after %	Population %
White	77%	83%	73%	74%
Mixed	9%	6%	10%	6%
Asian	2%	5%	5%	11%
Black	7%	5%	7%	6%
Other	3%	1%	4%	2%

Commentary

The above tables show that children and young people who are from mixed and other minority background are over-represented - both locally and nationally, when compared to the general population.

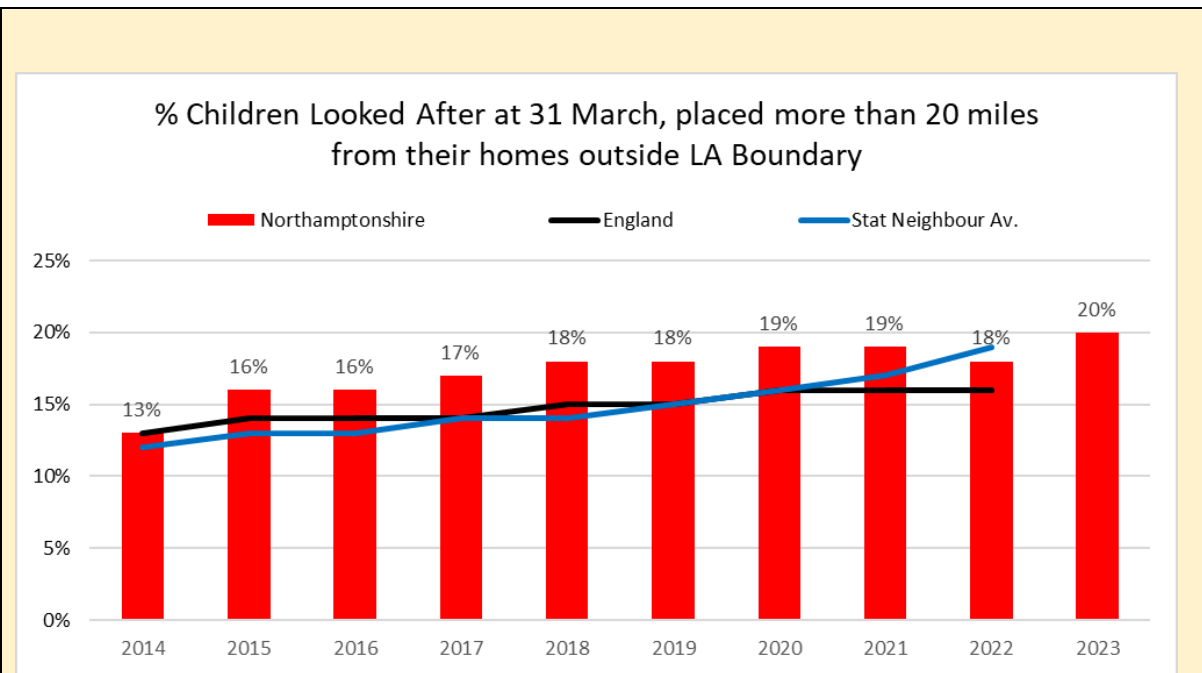
Children in Care at end March 2023 by age and placement type

	Under 1	1-4	5-10	10-15	16+	Grand Total
Children's Home	5	2	6	66	60	139
Fostering	41	85	135	265	96	622
Fostering (Friends & Family)	5	38	63	76	23	205
Independent living	0	0	0	7	135	142
Placed for adoption	0	9	4	0	0	13
Placed with parents	6	20	22	28	12	88
Residential care home/School	0	0	0	2	4	6
Other	3	1	0	2	5	11
Grand Total	60	155	230	446	335	1226



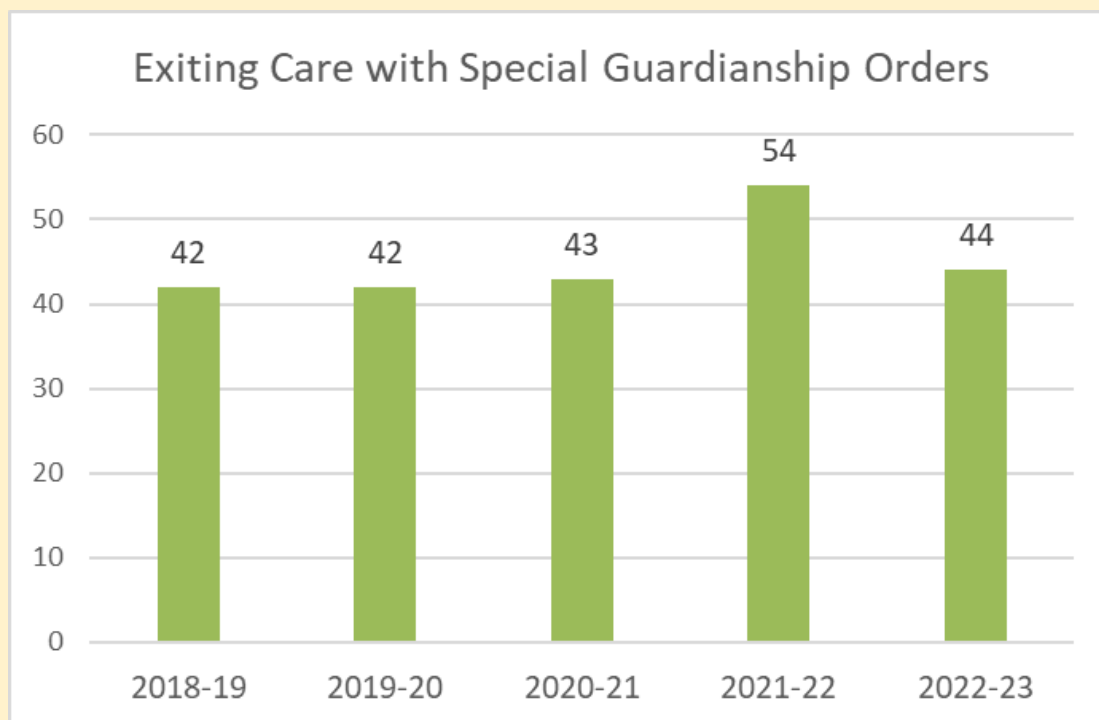
Commentary

This chart shows a decline for 2023, with the provisional end of March 2023 being 75%. The IRO Service has been involved in supporting stability through attendance at stability meetings and also within Circles to Success and tracking for permanence planning.



Commentary

The chart above shows the number of children placed 20 miles or more away from their family home and outside the Northamptonshire boundary. In some cases this means they could be closer to their family home than being placed in-county, which spans 56 miles along its axis. Placement sufficiency is a key concern local and nationally resulting in some children and young people having to be placed out of county.



Commentary

This chart shows that 44 children were made subject to a SGO in the year April 2022 to Mar 2023. Children in Care teams continue put forward plans for SGO as route to permanency with connected carers. IROs together with Social Worker also encourage foster carers to consider applying for SGOs for children who have been in long-term stable placements.

For the period April 2022 to end of Mar 2023

- Timeliness of reviews held compared to previous years

	2021-22	2022-23
% of Children in Care with their 1st review on time	78.9%	82.6%
% of Children in Care with their 2nd review on time	88.0%	88.3%
% of Children in Care with their subsequent review on time	93.2%	92.7%



**Placement Sufficiency Strategy
October 2022- March 2025**

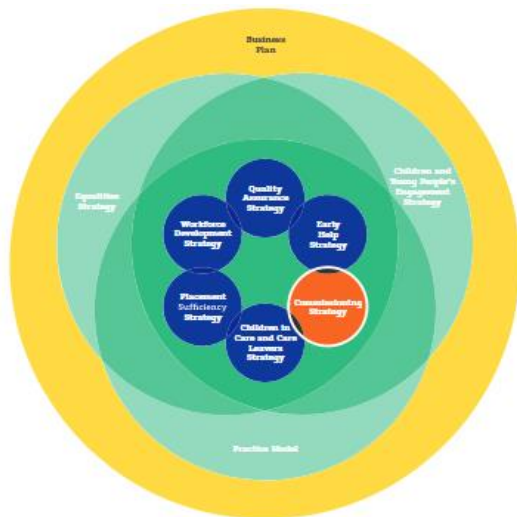
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1. Introduction

At Northamptonshire Children’s Trust we are dedicated to ensuring children, young people and families are at the heart of all we do – in every action we take and every decision we make. We know that what we do today affects children and young people’s tomorrows and we are focused on helping children and young people to live safe, be safe; fulfil potential; develop resilience and enjoy good health and wellbeing.

Our Placement Sufficiency Strategy sets out how we will ensure children in our care and care leavers have a home that is safe and suitable for their individual needs, where they are supported by people who care for them and about them to be achieve their full potential, develop resilience, enjoy good health and wellbeing and develop into adulthood. This will enable us to fulfil the *Sufficiency Duty*¹ along with West and North Northamptonshire councils by ensuring sufficient accommodation is secured that meets the needs of the children in our care and care leavers. Our Placement Sufficiency Strategy connects to the other core NCT strategies that together deliver our overall business plan:



In particular, it reflects the ethos and practice for working with children in care and care leavers, as set out in our Children in Care and Care Leavers Strategy 2021-25:

¹ Section 22G of the Children Act 1989

1 Children and young people are best cared for wherever possible with their birth family or extended family.
We recognise the strengths that are present in every family and help families to arrive at their own solutions to their own difficulties; we believe children are best raised within their birth family network and will do all we can to support this. We will ensure that the children in our care are only those who need to be in our care.

2 Children and young people will live in homes that take account of their needs and preferences.
We will work to ensure that positive opportunities and effective help are available at the earliest opportunity – encouraging children and young people to be ambitious and make the choices that mean they can thrive and achieve. Children's care will be well planned, promote stability and reduce the need for placement changes and emergency placements.

3 Permanence and a sense of belonging will be secured for children and young people.
Relationship-based practice will strengthen the relationships that are important to children and help them to stay connected to those people they love and are important to them.

4 Aim high and have high expectations.
We work with children young people and the families in which they live to ensure that they receive the support and services they need to live happy, healthy and successful lives.

6 Children and young people develop positive and stable relationships with those who support them.
Retaining a stable and resilient workforce which will empower and enable children, young people and families to achieve their full potential.

5 Good outcomes for children and young people are achieved through a collaborative approach with partner agencies.
Children, young people and their families experience consistent joined up approaches to assessing and meeting their needs.

7 The views, opinions, needs and priorities of children in care and care leavers inform everything we do.
We listen and observe attentively to children, young people and families, and respond to what they are telling us in order to inform how we improve the delivery of our services.

And is key to achieving this aspect of our pledge to children in care and care leavers, by achieving the outcome of *increased sufficiency of local placements so there is more choice for children:*

Make sure you are living in the right place

In delivering our Sufficiency Strategy we keep in mind what our Children in Care Council have told us about what **makes a good home**

People	Place	Other things that matter
<ul style="list-style-type: none"> Motivate me Support with medical needs and appointments Kind hearted Gentle Patient Approachable Caring 	<ul style="list-style-type: none"> Nice family who want to involve you in their family Having someone there for you Good company Boundaries 	<ul style="list-style-type: none"> Warm comfy environment My own bed My own space Good food Pets Blankets Safe
		<ul style="list-style-type: none"> Activities to do Groups to go to Have access to things you like Good school Sense of belonging Pocket money and budgeting

<ul style="list-style-type: none"> • Having a voice is the most important • Someone to talk to • Friends • Need respect • Larger family wanting to be involved with the young people • Strict but fair • Organised • Mother / father figure • Agree rules 	<ul style="list-style-type: none"> • Being able to freely express myself without judgement • Help me with my future • Life skills • Help with homework • Informed about trauma and how it affects me • Understand feelings 	<ul style="list-style-type: none"> • Respect my privacy • Wi-Fi • Own computer • Clean 	<ul style="list-style-type: none"> • Happiness • Good birthday and Christmases • Holidays
--	--	--	--

Our Strategy is delivered within the **NCT Strategic framework**



Strategic Framework

Vision

Children, Young People and Families at the heart of all we do - in every action we take and every decision we make.

Our Commitment

(co-produced with children and young people)

What we do today affects your tomorrow, we promise to walk side by side with you

Outcomes Framework



Conditions for Success



2. Our journey since 2020

In Northamptonshire, the vast majority of our children in care are cared for in stable placements that are meeting their needs, supporting them to achieve positive outcomes and progression towards independence. Compared with 2020/21, a higher proportion of children who have been in care for 2.5 years or more have been living in the same placement for 2+ years or placed for adoption (68% YTD at August 2022 compared with 63% in 2020/21), bringing us in line with our statistical neighbours.

We use a mixed model of inhouse and external fostering, children's homes and supported accommodation to meet the needs of our children and young people. The majority of our children

are living in children's homes or foster care that is rated good or outstanding by Ofsted. This means we are assured that children receive good quality care and we can see how this helps them achieve good outcomes through their care or pathway plan reviews.

We have improved the quality of our NCT IFA (Independent Fostering Agency), which is now judged as 'requires improvement to be good' by Ofsted, and we continue to deliver activity to further improve the quality of the services delivered by our IFA. The vast majority of our NCT children's homes and those on our 'block contract' (where we have sole use of the homes delivered by an external provider) are judged to be good or outstanding by Ofsted. At the time of writing, 2 of the 14 NCT and block contract homes were judged as 'requires improvement to be good' and have plans in place to achieve an improved rating. All provision on our residential and IFA frameworks are rated good or outstanding by Ofsted. In the main any spot purchased registered provision we commission is rated good or outstanding.

Our 2020 – 2022 Sufficiency Strategy was delivered in a context of major local, national and global challenges and changes: The Covid 19 pandemic impacted our lives in a way most had not previously experienced and we continue to see the impact on children and families' mental health, pressure and dynamics in families, which has been exacerbated by cost of living increases in 2022. Nationally, there has been increased demand in public and specialist services whilst recruitment and retention challenges in care and social work have grown, and risks to children from outside their homes in the form of exploitation continues to cause serious safeguarding issues, trauma and stress to children and those who care for them across the country.

As is the case nationally, we have seen an increase in demand for our support, an increase in the complexity of needs of children and an increase in numbers of children in care as we emerged from lock downs. NCT have seen an increased number of safeguarding referrals; 43,393 initial contacts were received by children's social care across 2021/22, which is 2,020 more than 20/21. The number of children in care in August 2022 was 1218 in comparison with 1143 at March 2021. We also saw an increase from 785 children in placements in Apr 2021 to 888 in June 2022. Additionally, since 2020/21 we have seen an increase in the proportion of our children in care who have had 3+ placement moves in the last 12 months, and this is higher than England and statistical neighbour averages.

During this time, it has also been recognised that the placements market is not meeting the needs of children or local authorities: [Final Report - The Independent Review of Children's Social Care \(independent-review.uk\) \(June 2022\)](#); and The Competition and Markets Authority report on Children's Social Care [Final report - GOV.UK \(www.gov.uk\)](#) (March 2022)

Within this challenging context, we have remained relentless in our drive to achieve the priorities of our 2020- 2022 Sufficiency Strategy:

- Improved placement stability
- Improved outcomes for children and young people
- Improved sufficiency of NCT fostering
- Improved sufficiency of placements
- Reduction of placement costs

The impact of this activity is that we now have a better early help offer which is having a positive impact enabling families to remain together or be reunited. We have improved our understanding of needs and have delivered plans to provide access to a greater number of fostering, children's homes and independent supported accommodation that is suitable to meet the needs of our children. We have reviewed our processes to improve the efficiency and effectiveness of placement searches to

enable the right placement to be found in a more timely way and have improved our quality assurance activity to ensure action is taken swiftly to address any concerns and better value for money is achieved. Many of the activities will continue as we move into the delivery of our 2022-25 Sufficiency Strategy and the continuing national sufficiency challenges and increase in demand mean this remains a top priority for NCT.

A summary of what we did to deliver these priorities and the impact on children and young people is provided at **Appendix 1**.

3. Sufficiency Assessment 2022 - Our children

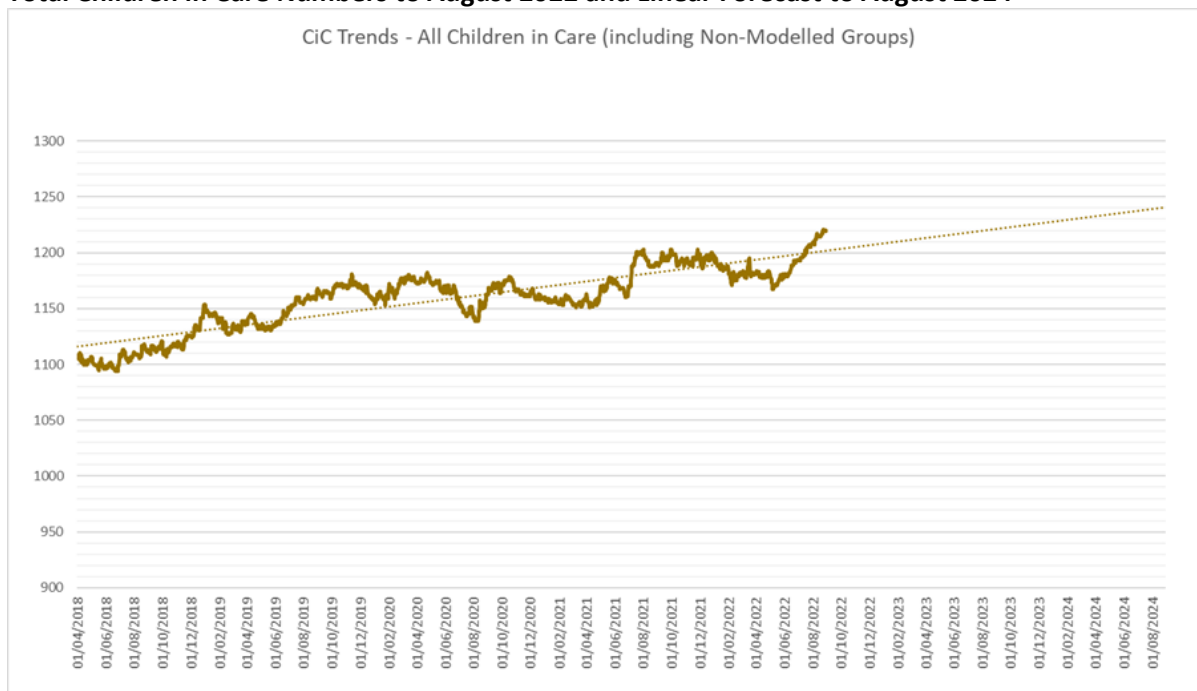
Number of Children in Care and Forecast

At the time of the 2020 -2022 Sufficiency Strategy, there were 1163 children in care. The linear forecast at that time was 1254 children in care by March 2022. As at 31st March 2022, there were 1184 children in care, 70 less children than our forecast. The number may have been lower than expected due to the Covid 19 pandemic and lockdowns from March 2020 when the number of children in care remained steady.

Overall numbers of children in care increased from 1094 to 1184 across 4 years up to March 22, which is an 8% increase. April – August 2022 has seen a further increase to 1218. This is likely due to the impact of the pandemic followed by a significant cost of living crisis, as well as separated children arriving after the allied withdrawal from Afghanistan. Using the Placement Modelling tool from the Data to Insights project with August 2022 data, a straight linear trend line estimates the August 2024 total care population at 1241². The forecasting tool also provides a lower and upper confidence intervals of 1185 and 1257 respectively. NB because the tool forecasts up to 2 years ahead and the current cost of living crisis could have a major impact on children needing to come into care, we will re-run the forecast every 3-6 months and adjust our plans accordingly.

² The term ‘modelled groups’ refers to children in care in foster placements, residential or supported accommodation. It excludes groups where modelling is not created – e.g. adoption placements, placements with parents and other placements.

Total Children in Care Numbers to August 2022 and Linear Forecast to August 2024



Based on current trend, the tool provides a forecast by age and placement type as per the table below:

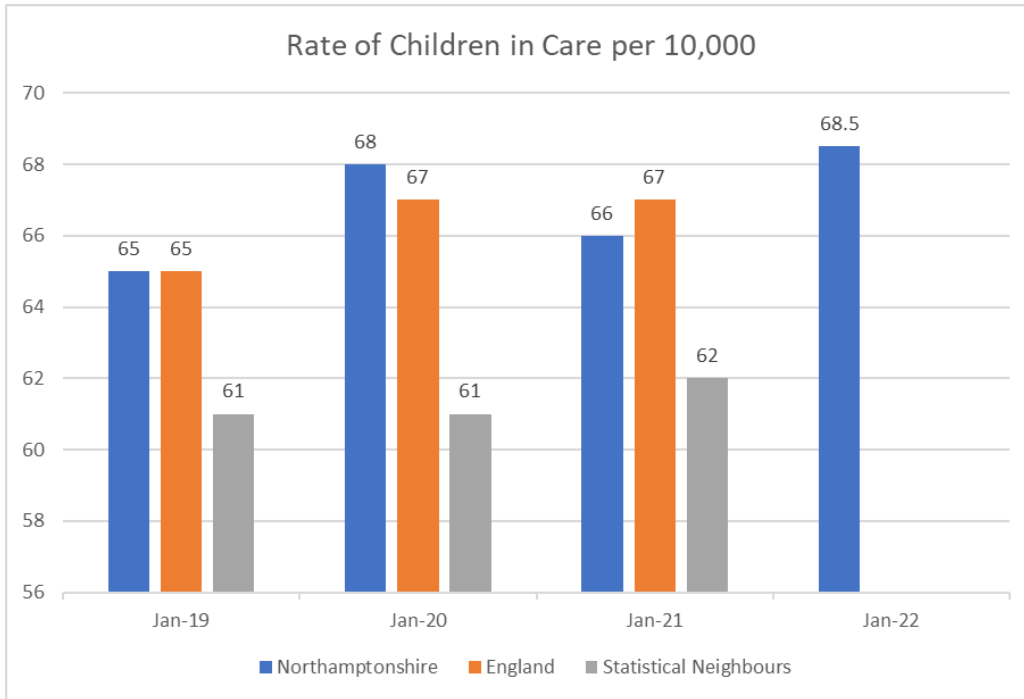
2024 Forecast Summary Figures for children likely to require fostering, residential and supported accommodation: Placement Type and Age

	Total - All	Total Modelled (Fos, Res, Supp)	Fos	Res	Supp	Age 0	Age 1_4	Age 5_9	Age 10_15	Age 16_18
31/03/2022 Actual	1184	1062	844	131	87	57	115	207	440	243
31/08/2022 Actual	1218	1093	847	139	109	43	136	188	441	285
31/08/2024 Tool Forecast	1221	1085	861	134	90	48	123	201	461	252
Base LCI	1185	1048	830	122	77	36	110	186	441	234
Base UCI	1257	1121	892	146	103	60	136	216	481	270
31/03/24 Linear Trend Forecast	1241	1114	862	141	111	44	139	192	449	290
% change Aug 2022 to tool forecast	0.2%	-0.7%	1.7%	-3.6%	-17.4%	11.6%	-9.6%	6.9%	4.5%	-11.6%

The forecast shows an expected increase in the numbers of children aged 5- 15 years and an expected increase in demand for fostering.

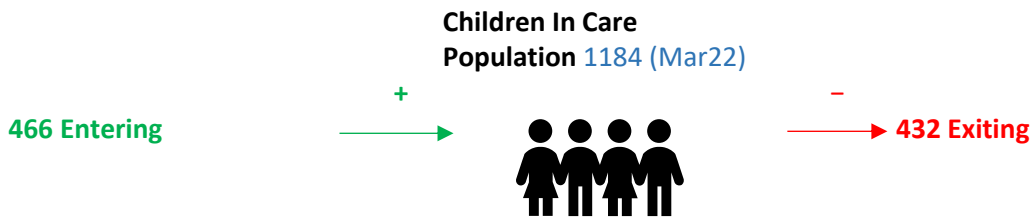
Rate of Children in Care per 10,000

As at March 2022, the rate of children in care per 10,000 was 68.5. This is slightly higher than the latest available national average 67 per 10,000. As with the number of children in care, the rate per 10,000 has increased since 2019.



Please note the rate of children in care data for England and Statistical Neighbours will be not released until November 2022.

Number of Children Entering and Exiting Care (all under 18s) April 21 – March 22



Gender and Age of Children in Care

In Northants, the proportion of **boys and girls** in care remained steady in 2020/21 (54%/46% respectively) and 2021/22 (55%/45% respectively). There were 194 females entering care in 2021/22 compared to 272 males.

This was similar to the latest available national data of children in care from 2020/21 (55.9% boys and 44.1% girls). Boys are overrepresented in the care system in comparison to both the county and national demographics.

Census data 2021

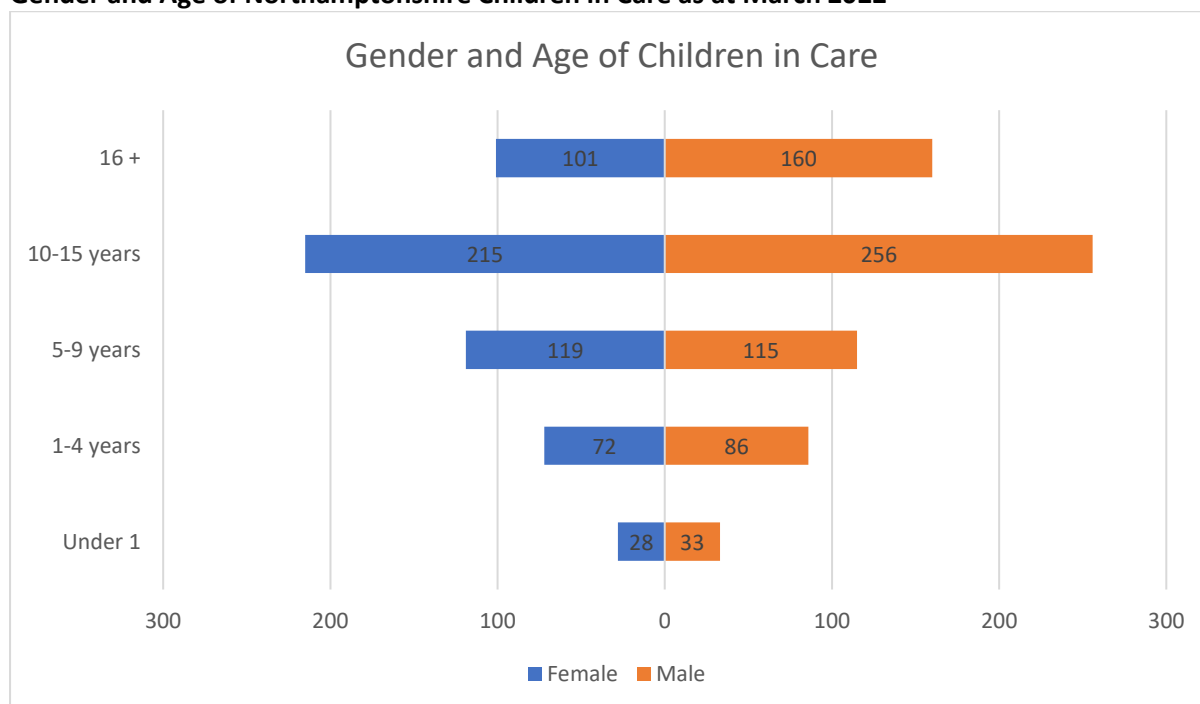
0-19 years old Northamptonshire	%
Male	51.04%

Female	59.86%
0-19 years old England & Wales	%
Male	51.23%
Female	48.77%

A What Works for Children’s Social Care study (2021) highlighted that boys are more likely to externalise emotions. There is some evidence to suggest that children who externalise are more likely to make positive progress in residential care³.

The **age group** with the highest number of children in care and entering care is the 10–15-year-old age group. We know that a significant number of this age group has a care plan of long-term fostering.

Gender and Age of Northamptonshire Children in Care as at March 2022



The largest group of children entering care during 21-22 were 10-15 year olds.

Entrants (March 21- 22)	Females	Males	Grand Total
Under 1	36	40	76
1-4 years	31	37	68

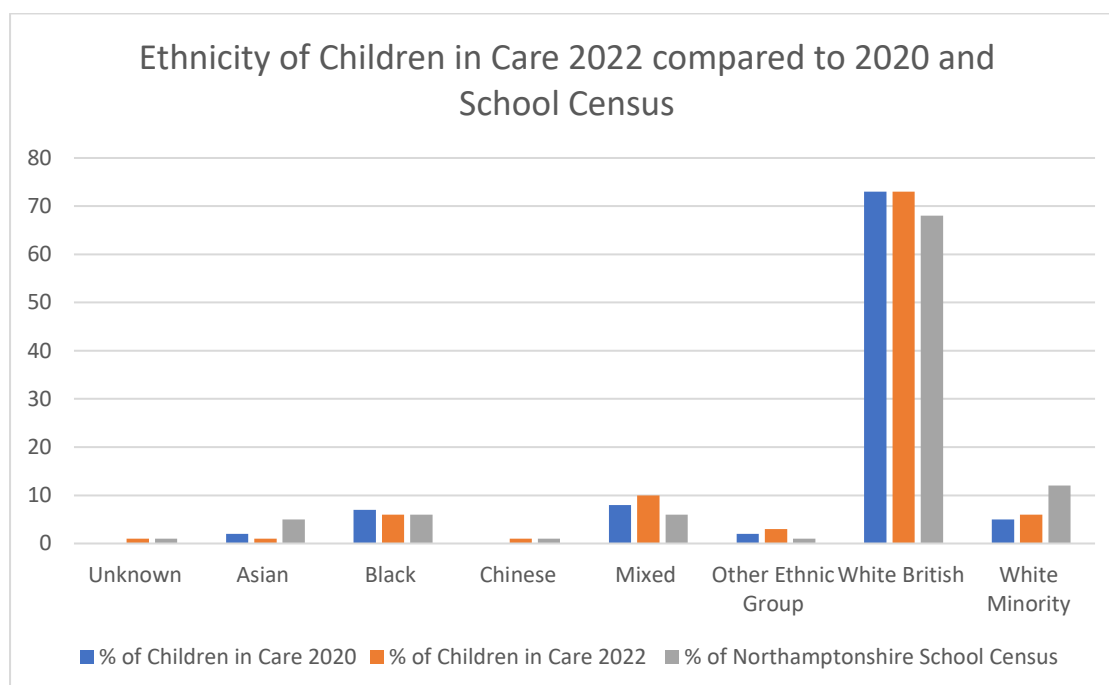
³ What Works for Children’s Social Care (2021) ‘Residential Care’, *Comparing the outcomes of residential care with other types of placement, such as foster care*. Available at: <https://whatworks-csc.org.uk/evidence/evidence-store/intervention/residential-care/#:~:text=Overall%2C%20residential%20care%20had%20no%20effect%20on%20children%E2%80%99s,care%20when%20both%20were%20providing%20%E2%80%98care%20as%20usual%E2%80%99>

5-9 years	39	59	98
10-15 years	63	72	135
16 +	25	64	89

Ethnicity of Children in Care

The largest ethnic group of children in care is White British, with 865 (73%) children and young people. The second largest is children from any other White Background (61 children, 5%) followed by African (50 children, 4%). The lowest number of children in care ethnic groups are Chinese (>5), Asian (>5) and Other Ethnic Groups (>5)⁴.

The profile of children in care is slightly different to the Northamptonshire school population as a whole with White British and Mixed Ethnicity being slightly overrepresented in the children in care population. This is change from 2019 when Black children were slightly overrepresented in the Northamptonshire care system compared with the school population.



Children In Care with Special Educational Needs and Disabilities

There are 198 children in care with an EHCP (Education, Health, and Care Plan) (at March 22). 4099 children in Northamptonshire have an EHCP, which is 3.3% of all children. Of the 767 children in care who are of statutory school age 26% of children in care have an EHCP. Therefore, of the 4099 children in Northamptonshire that have an EHCP 198 of them are children in care which is 5% meaning that children with an EHCP are slightly over represented in the care system.

⁴ The ethnicity categories used are those used in the Census and further definitions and information can be found here: [List of ethnic groups - GOV.UK \(ethnicity-facts-figures.service.gov.uk\)](https://www.service.gov.uk/ethnicity-facts-figures) and [Writing about ethnicity - GOV.UK \(ethnicity-facts-figures.service.gov.uk\)](https://www.service.gov.uk/ethnicity-facts-figures).

There are currently 43 children in full time care in the Disabled Children’s service, 27 of whom are in residential care.

Needs of Children in Care

Reasons for Children Coming into Care over 2021/22 were:

Entrants by Reason	Entrants
Socially unacceptable behaviour	12
Parental disability or illness	12
Low income	0
Family in acute stress	23
Family dysfunction	79
Child's disability	7
Abuse or neglect	205
Absent parenting	50
Cases other than children in need	78

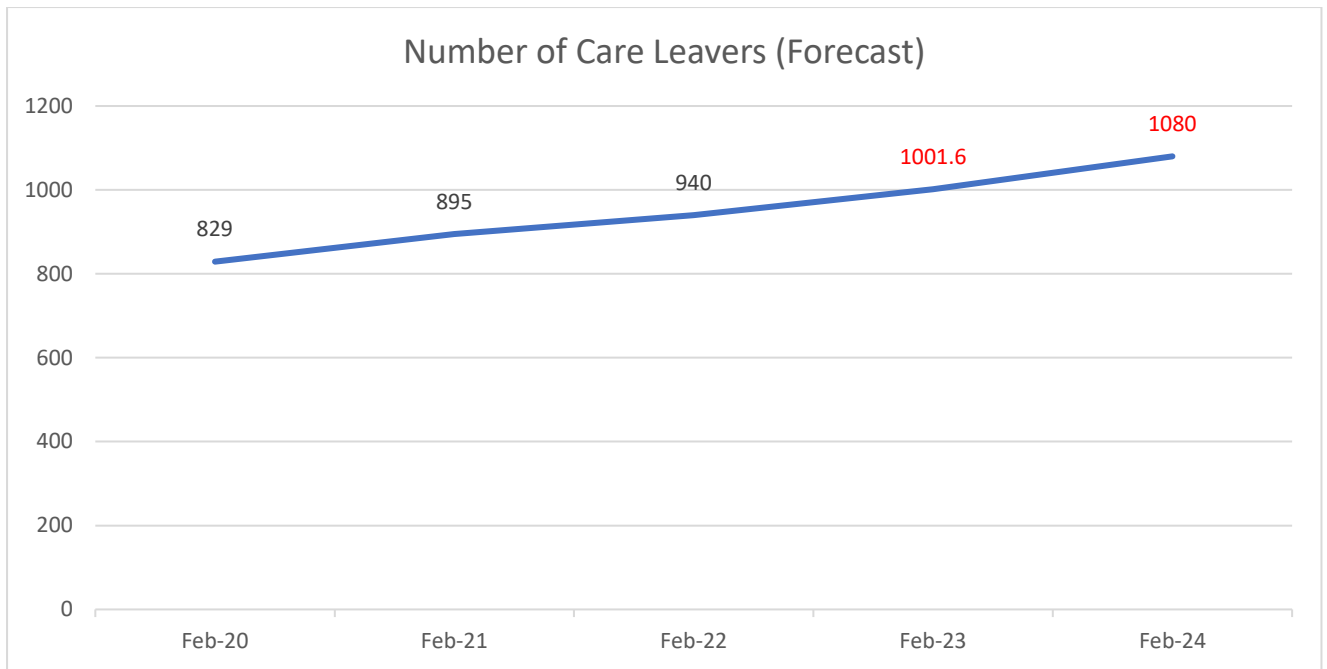
The most frequent reason for children coming into care is because of abuse or neglect. This means we will need placements that can support children who have experienced abuse and neglect and the effect this can have on children’s presenting behaviour, particularly as they reach teenage years.

Leaving Care

In March 22, 940 young people above the age of 16 were being supported by the Leaving Care team.

Leaving Care Cohort by Age	Grand Total (Mar 22)
16+17	258 (14 of whom are relevant so no longer in care)
18	146
19	140
20	165
21	100
22	55
23	47
24	29
Grand Total	940

Our projections tell us that this population is likely to grow to 1080 by 2024 which is an increase of 140 who are likely to require the support of the Leaving Care service (this includes 16 – 17 year olds supported by the service)



Number of Young People 18+ Entering and Exiting the Leaving Care Service Projections based on current age (April 22-March 24)

This projection is based on the number of 16 & 17 years old currently in care who may become care leavers and the number of 22 - 24-year-olds who are leaving care as shown in the diagram below.

The net gain in the care leavers population is potentially 127 by March 2024

It should be noted that over 21s choose whether they still want support from Leaving Care. However, it is envisaged with the forthcoming economic challenges faced in the UK, as well as other challenges facing young people such as mental health, that more care leavers may choose to stay supported.



The percentage of care leavers aged 17-21 and in employment, education or training was 60.6% and 92.5% were in suitable accommodation (August 2022), both above the national and statistical neighbour averages. This indicates the majority of our care leavers are on positive journeys to independence.

Separated Children

There are currently 68 separated children in care (also known as UASC – unaccompanied asylum-seeking children) and 48 entered care during 2021/22. 97% of the UASC population is male (66) and only 3% are female (less than 5). Out of the 48 UASC who entered care during 2021/22, 85% (41) are 16 or 17 years old. Only 7 (14%) are 10 to 15 years old. The number of separated children arriving in

the UK is impacted by international issues such as wars and will need to be monitored carefully to adjust plans according to any large increases.

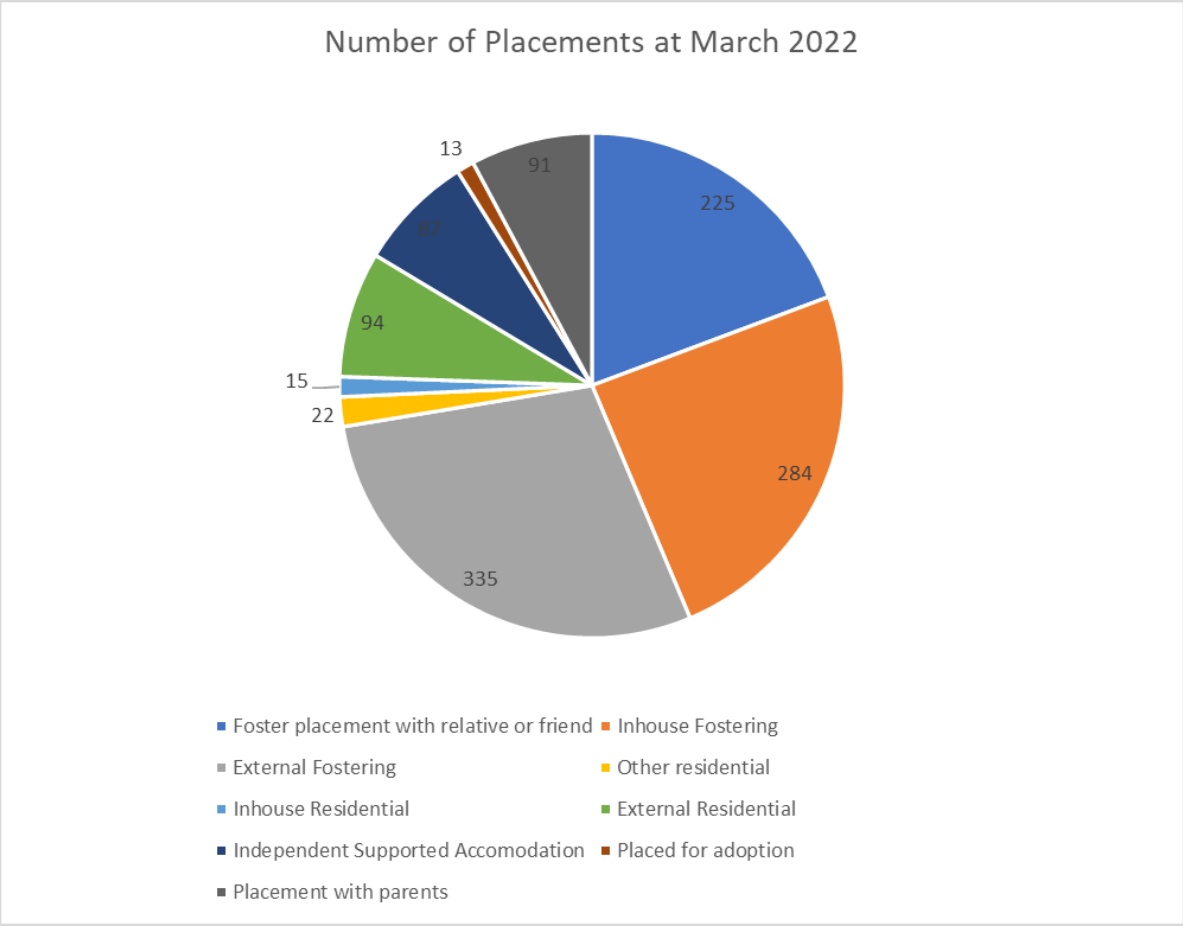
Age	UASC	Former UASC population (care leavers)
14	1	
15	3	
16	19	
17	45	1
18		43
19		50
20		56
21		24
22		19
23		14
24		8
Total	68	215
Grand total	283	

Of the 215 former separated children most have leave to remain status, 11 have no recourse to public funds and have the status of ARE (Appeal Rights Exhausted). All young people who are ARE will have a Human Rights Assessment before decisions are made as to next steps.

In the next year, according to the numbers above, 45 separated young people will become care leavers.

Current Placement Trends

Placement Types for CIC (Children In Care including separated children) and Care Leavers (including separated young people)



In March 22 the largest number of placements were with foster carers with 335 children placed with external fostering agencies and 284 with our internal foster carers. There were 94 children placed with external providers children’s homes. There were 82 under 18s in Independent Supported Accommodation and a further 204 over 18s were also in ISA placements.

49% of all placements for under 18s at end of August 22 were with external providers.

Separated children

For those externally commissioned placements we know that separated children and young people are placed in the following types of provision:

Placement Type	Number of Children in Care UASC
Supported Accommodation	37
Agency Fostering	15
Staying Put/Shared Lives	0

Placement Type	Number of Care Leavers UASC
Supported Accommodation	111
Agency Fostering	0
Staying Put/Shared Lives	10
HMOs	9

Planned and unplanned placement requests

We use the following definitions for our placement requests:

Planned	14 days notice or more
Short notice	4-13 days notice
Emergency	2-3 days notice
Crisis	Same day

The proportion of crisis placement requests have reduced since 2017 and the proportion of planned placements has increased. Planned placements allow for time to be taken for the best match to be found and therefore are more likely to have better outcomes for our children.

Placement Request Type	2017		2018		2019		2020		2021	
	CYP	%	CYP	%	CYP	%	CYP	%	CYP	%
Crisis	336	39%	444	37%	410	38%	308	35%	318	35%
Short Notice	264	31%	303	25%	259	24%	294	33%	280	30%
Planned	259	30%	452	38%	406	38%	283	32%	317	35%

58% of respondents to a People Too survey of our providers (Jan 22) said that the main reason they serve notice on a placement is due to challenging behaviour presented by the young person. The highest proportion (38%), when asked what would help more, said closer working and support from allocated social workers would be valuable.

There is a national shortage of placements that can receive children in an emergency or on the same day. To address this we are taking the following action:

- Taking actions to reduce placement breakdowns and need for emergency placements, informed by analysis completed on this in 2021 and 2022 (effective earlier intervention with families, effective multi disciplinary team and placement stability meetings, more effective and efficient placement request and brokerage processes, additional capacity to support NCT IFA and external placement stability)
- Focused recruitment of NCT emergency and short term foster carers
- Commissioning external emergency external foster carers
- Commissioned 2x new emergency children's homes (6 places in total) to be operational in Q3 22/23
- Secured continuation funding for therapeutic interventions for children in NCT foster care
- Improving our understanding of the impact for children of therapeutic support within placements

Type of placement requested vs type of placement secured

Due to the national sufficiency challenges it is not always possible to secure the same type of placement as that which was requested. This means the placement may not be completely in line with the child's care plan and a further move may be needed when a preferential type is available. Although it should be noted that more than one placement type may be suitable for a child. Data for the 12 month period of 1 Sept 21- 31 Aug 22 shows:

- Of the 688 children for whom a foster placement was requested, 49 went to residential care and 28 to supported accommodation – this suggests their needs could not be supported within available foster care places

- Of the 111 children for whom residential care was requested, 21 went to supported accommodation - this suggests their needs could not be supported within available residential care places

Unregulated/ Unregistered Placements

Places where children (other than disabled children) are accommodated while on holiday or taking part in leisure, sporting, cultural or educational activities where each individual child stays there for less than 28 days in any 12-month period, do not require registration with Ofsted and are unregulated. The child would however require a main placement, that should be regulated.

THE CARE PLANNING, PLACEMENT & CARE REVIEW (ENGLAND) (AMENDMENT) REGULATIONS 2021 came into force on 9 September 2021 and prohibit placement of children in care under 16 in unregulated / unregistered accommodation.

Where a service is **providing care for a child under the age of 18** in a static placement, this service must be registered by Ofsted. Failure to do so results in the placement being unregistered and therefore illegal. It is NCT policy that we do not place in an unregistered setting.

All young people over the age of 16 who have care needs and are living in accommodation other than foster care, are required to be placed in a children's home that is registered with Ofsted. Supported accommodation is not Ofsted registered and is therefore deemed an unregulated setting. We use the DfE published care and support checklist to confirm if care or support is being provided for over 16s if this is not immediately apparent. All independent and semi-independent provision for children in care and care leavers aged 16-17 will be required to register with Ofsted and subject to mandatory national standards from April 2023 and inspections from April 2024.

There are circumstances when it may be appropriate for a care home to be registered with CQC (Care Quality Commission) rather than as a children's home with Ofsted. If a child over the age of 16 is placed in accommodation because of their need for nursing care or personal care, the CQC provider would be suitable if registered to provide residential care and the child's plan indicates that would be the young person's permanent home beyond the age of 18. If the primary reason for placing a child in the accommodation is care that is not nursing care or personal care, it is likely this will be a children's home that should register with Ofsted.

Like children's services in other local authority areas, we have on occasion had to use unregulated provision for children under and over 16. This has been in the context of the national sufficiency challenges and there not being a suitable regulated provision available that could meet the needs of the individual child.

The decision to use unregulated/ unregistered provision is taken at Assistant Director level or above, with confirmation of how the placement can meet the child's needs, quality assurance checks and an unregulated placement risk assessment. Once a child is living in unregulated provision, IRO and senior management will continue alongside regular visits from the child's social worker and the Quality & Outcomes team. The Quality and Outcomes team continue to provide quality assurance and follow up any actions required of the provider with regards to quality, they will also provide advice and guidance regarding Ofsted registration and track progress of this.

As at 31st August 22, there were:

- 9 under 16s living in unregulated/ unregistered accommodation
- 9 over 16s living in Independent Supported Accommodation and receiving care

- 8 over 16s living in CQC registered provision, including 3 for whom the plan is for them to continue living in the placement after the age of 18

Of these children:

- A number had required a same day placement as a result of a police protection order and / or bail conditions meaning they could not return home
- A number were subject of deprivation of liberty order or applications were in progress
- A number had been living at a residential schools which had given notice and an alternative residential school had not yet been identified
- A number were living in provision that had applied or started the process to apply for Ofsted registration

There has been a commonality of needs of children for whom we have been unable to find regulated/ registered provision when the placement has been made and we are progressing plans to address this sufficiency needs

Needs	Progress so far on increasing our sufficiency to meet the need
Mental health issues, self-harm, suicide ideation	3 places planned - DfE capital bid in partnership with external provider and West Northants Council
Exploitation (particularly criminal and sexual)	Proposal to develop 3 NCT beds through unitary capital refurbishment scheme
Complex disabilities including ASD and behaviour that challenges	Additional 5 bed out of county children's home added to our block contract – operational from Nov 22
Trauma from a history of abuse	New provisions will provide trauma informed care

Emergency provision opening in the autumn 22 will provide 6 regulated beds with an external provider helping us to avoid need to make unregulated placements.

We are also commissioning a block contract for emergency same day and out of hours foster carers.

Unregulated foster care

If a child is placed with a connected person who is not approved under Regulation 24, or with a foster carer where the placement is not in accordance with their terms of approval, the placement is unlawful. Where it is in the best interests of the child to be in an unregulated foster care placements approval is required at Assistant Director level or above. A risk assessment and senior management oversight of actions will be in place.

There are 225 children living in Family and Friends Fostering arrangements. In July 22 11 of these arrangements were unregulated with the carers in the process of undertaking registration and training.

Proportion of Children living out of county and 20+ miles from their home

As at August 22, 17% of our children were living out of county and placed 20 miles or more from their home. This has decreased steadily from 19% in 2020/21 and 18% in 2021/22. We are now in line with our statistical neighbours and 1% point lower than the national average. Whilst in some instances an out of county placement is required, where it is not, we always seek to find a suitable home in county and within 20 miles of their home so they can continue to easily access support from local services and networks. We therefore need to continue to focus efforts on ensuring sufficient local provision that can meet children's needs

4. Current Sufficiency

Fostering

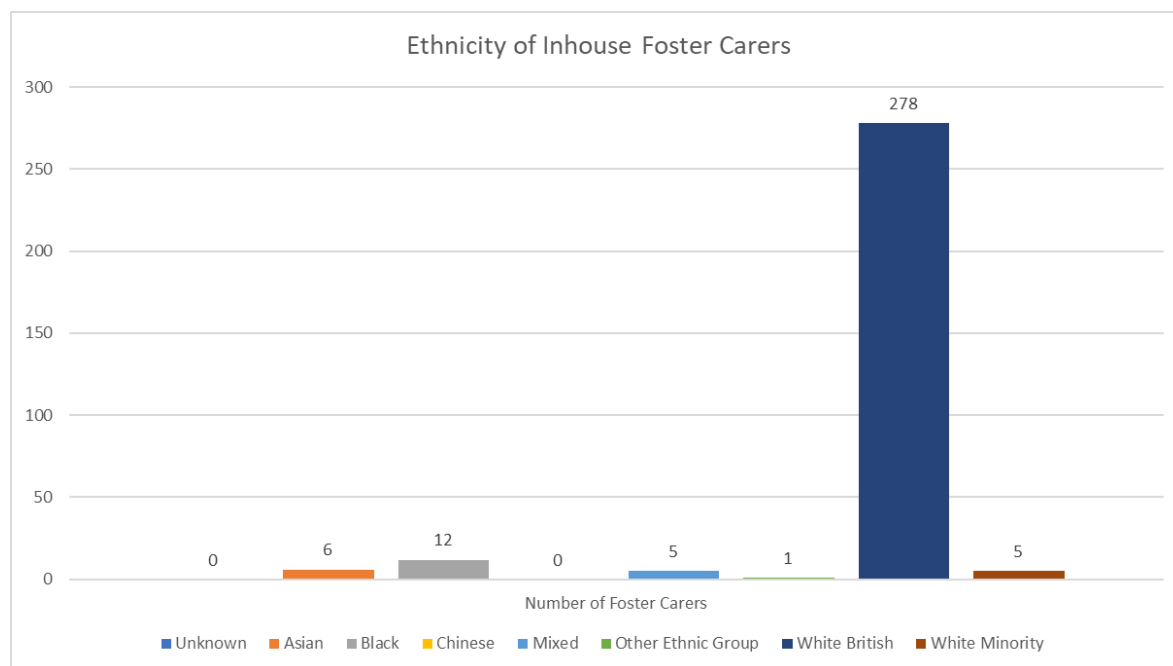
NCT Independent Fostering Agency

As at end of August 22, there were:

- 122 approved friends and family carers
- 207 approved foster carer households, providing up to 392 places, including:
 - o 44 long term specific
 - o 149 long term/ short term
 - o 5 emergency
 - o 5 resilience (for children with more complex needs / stepping down from residential)
 - o 2 parent and child
 - o 3 respite only

As at August 22, the NCT foster carer utilisation rate was 67% , with 27% of places not currently available (for example due to awaiting child moving in, carer holiday or to meet needs of a child). This doesn't include friends and family carers.

Ethnicity of NCT foster carers (including family and friends foster carers)



* Ethnicity of Carer 1

89% of NCT foster carers are White British with the second largest group of Black Ethnicity, followed by Asian and then Mixed Ethnicity. **This suggests it would be beneficial to recruit more carers from global majority backgrounds to provide more options of a cultural match for our children.**

Ethnicity	% Of inhouse Foster Carers	% Of Children in Care
White British	91%	73%
Black	4%	6%
Mixed	2%	10%

Gender of NCT foster carers

Carer 1	
Gender	
Female	274
Male	33

Carer 2	
Gender	
Female	30
Male	185

This data suggests it would be beneficial to increase our number of male carers particularly as the proportion of boys in care is higher than girls.

Location of NCT foster carers

Area Breakdown	
North	159
Out of County	29
West	119

This data suggests it would be beneficial to have additional carers in the West as the proportion of children in care from North and West is around 50/50

Ages of NCT foster carers

Age of Carer 1 (years)	Number of foster carers
21-30	6
31-40	36
41-50	84
51-60	111
61-70	60
71-80	9
81-90	1

59% of our foster carers are aged 51+ and 22% are aged 61+ so our recruitment plans need to take into account the likelihood of retirement for these carers

External Independent Fostering Agencies

As at August 22, have the following numbers of providers on our IFA framework (NB placements are purchased on an as needed basis according to matching with children and other local authorities also use these providers, so the placements are not guaranteed for NCT)

- Standard: 41
- Specialist: 8

The vast majority of our external fostering placements are made with providers on our framework (live placements as at 15/8/22). Making placements with providers on our frameworks can mean we are able to achieve better value for money and already have assurance of the quality of provision.

	No. of Framework placements	% of Framework placements	No. of Non-Framework placements	% of Non-Framework placements	Total number
External IFAs	320	87%	48	13%	368

Children's Homes

NCT have 5 Children's Homes, with capacity for up to 21 children. In August 22 our children's homes were at 76% occupancy. The statements of purpose have been reviewed to ensure that the needs of our population of children in care are met and help us to operate at a higher rate of occupancy.

NCT also has a strong partnership through a **Block Contract arrangement** where we work closely with a provider to deliver high quality homes for children. This provides homes for 32 children across 9 Northamptonshire locations which we have sole use of. Utilisation rate was 91% at end of Aug 22. In addition:

- During Q3 of 22/23 a further out of county home, providing up to 5 places will be operational within the block contract.
- During Q3 of 22/23 2 new emergency children's homes will be operational (one in West, one in North) providing up to 6 places as a block contract

NCT Children's Home Framework

As at August 22, we have the following numbers of providers on our Children's Home framework (NB placements are purchased on an as needed basis according to matching with children and other local authorities also use these providers, so the placements are not guaranteed for NCT):

- Standard: 46
- Specialist – Children with complex social emotional and mental health needs and low-level disability: 30
- Specialist – Children with a disability and complex health needs: 12

52.5% of our external children's homes placements are made with providers on our framework (live placements as at 15/8/22). Making placements with providers on our frameworks can mean we are able to achieve better value for money and already have assurance of the quality of provision. **This data suggests our children's home framework provision is not able to meet the needs of our children or provide places as much as we would like.**

	No. of Framework placements	% of Framework placements	No. of Non-Framework placements	% of Non-Framework placements	Total number
External Children's Homes	53	52.5%	48	47.5%	101

Independent Supported Accommodation

Independent Supported Accommodation is suitable for children aged 16+ where this meets their needs to develop independent living skills and they no longer require care. All our commissioned ISA provision works to enable young people to achieve independent living outcomes

Training Flats

We have a block contract for 19 training flats in Northampton for up to 21 care leavers who need additional support to develop independent living skills. Capacity as at August 22 was 100%. At the end of Q4 21/22, only 2 care leavers living here were NEET. All young people who moved out did so in a planned way, however some young people have lived here for longer than intended suggesting there has been difficulty in securing them move on accommodation.

From summer 2023 we will have an additional 9 training flats for care leavers with additional needs in Northampton.

Other ISA placements

As at August 2022, we have the following numbers of providers on our ISA framework:

- Semi Supported Accommodation with 24 hour staffing (Accommodation Manager) and a minimum of 2 hours of 1:1 support per young person per week: 68
- Semi Independent Accommodation (solo or shared) with 2 hours of 1:1 Support per young person per week: 68
- Standard Additional Support hours: 71
- Specialist Additional Support hours: 36

The vast majority of our ISA placements are made with providers on our framework (live placements as at 15/8/22). Making placements with providers on our frameworks can mean we are able to achieve better value for money and already have assurance of the quality of provision.

	No. of Framework placements	% of Framework placements	No. of Non-Framework placements	% of Non-Framework placements	Total number
Independent Supported Accommodation	296	90%	32	10%	328

Independent supported accommodation **will become subject to Ofsted registration** from April 2023 and the first inspections are expected from April 2024. This will benefit young people and commissioners through external scrutiny of quality of provision. There could however be an adverse impact on sufficiency if providers choose not to register or fail to meet requirements.

In August / September 2022 we surveyed ISA providers that are currently supporting our 16-17 year olds. Of the 39 that responded, 59% indicated they are likely to register, 39% would like support to know more. Only 2 providers said they are unlikely / will definitely not register. We are planning to deliver support during Q3 and Q4 22/23.

There is a risk that landlords may not be willing to apply for this type of planning permission, if one is required, due to impact on neighbours and locality, and this may impact on provider's ability to source appropriate properties for this effect.

The final version of the national standards have not yet having been published, so it is currently unknown what costs will be associated with providers registering with Ofsted. This may present a challenge in growing the market and therefore drive costs up. When the government's response was first published, it was thought that at a regional level it could increase prices by up to 30%. This will require careful monitoring.

Staying Put

Care leavers people can remain with their foster carers until they are 21 years-old, through a staying put agreement between NCT, foster carers and the young person. As at Aug 22, there are 58 care leavers under this arrangement. This is a good outcome for young people as it allows them to remain where they live for longer while learning to prepare for independence. However, this scheme has a slight impact in the sufficiency of foster carers for children in care.

Shared Lives

Is a CQC (Care Quality Commission) registered scheme, where young people with complex needs, such as learning disabilities or mental health difficulties, live with approved carers. As at Aug 22, there are 7 care leavers in this arrangement.

Houses of Multiple Occupancy (HMOs)

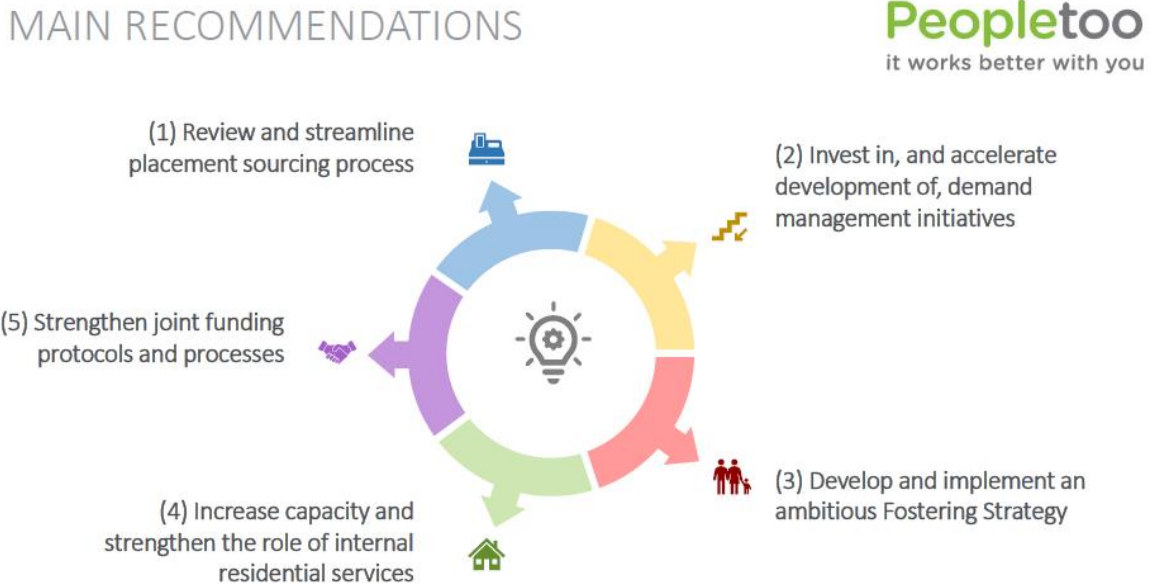
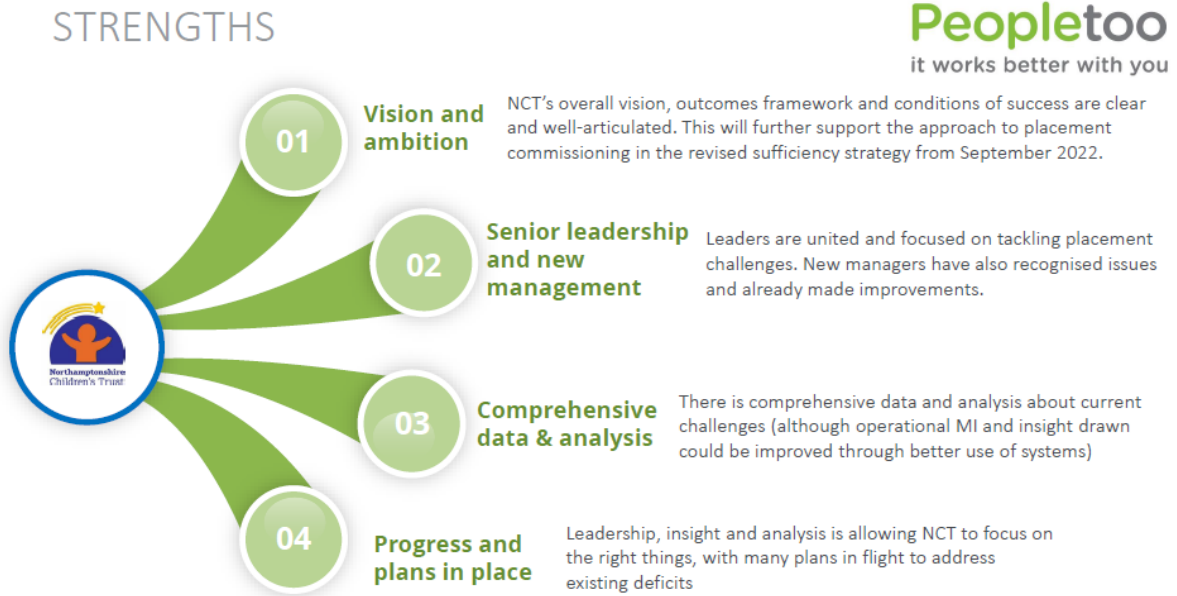
As at August 22, we have use of 3x HMO properties providing places for up to 16 care leavers in Northampton. These are suitable for care leavers who do not require support, particularly previously separated children. We have decided not to renew the lease of 1 of the properties in accordance with current needs and are considering future use of the HMOs in line with staying close proposals.

5. External review – Key messages

In 2022 we commissioned an external review of our placements commissioning to identify areas for improvement and inform the refresh of our Sufficiency Strategy. The review completed by People Too in February 2022, found:

- NCT has a good understanding of demand, sufficiency, and its key challenges and opportunities relating to children in care placements.
- In some areas, NCT is managing and meeting need as effectively as comparators. Despite this, some intractable issues are present that require creative and innovative solutions
- The provider market is not operating effectively to meet NCT's needs. Whilst some changes can be made to commissioning processes, this will still be insufficient. To make the step-change that NCT wishes to, in line with its strategic ambition, there are opportunities for a significant return on investment programme relating to internal fostering and residential services to increase capacity and their ability to support those with the most complex needs.
- There are also opportunities to streamline and increase the efficiency of placement sourcing processes, alongside a re-balancing of senior management and practitioner accountability, to reduce the delay in sourcing placements.
- Progress has been made to strengthen arrangements relating to joint funding of packages and this is evidenced in additional funding contributions; however, there are opportunities to embed this further and re-balance the proportionate contributions from different agencies, accompanied by clearer representation and accountability at decision-making panels.

- NCT should also consider opportunities to enhance its offer to reduce demand for placements, through a strengthened early help partnership offer, high quality social work practice, and edge of care services.



We have progressed actions to deliver these recommendations during 2022 (see Appendix 1) and will continue through the 2022-25 Sufficiency Strategy priorities and action plan.

6. What does our data tell us? – Key messages for our sufficiency plans:

Based on linear forecasts to 2024:

- We expect an increase in the total number of children in care between August 2022 – August 2024 of approx. 23 children and we continue to have a higher rate of children in care than our statistical neighbours and the national average. **We will need to continue to improve early intervention and practice to enable children to remain within or return to their families if this in their best interests.**
- We expect we will continue to see a higher proportion of boys in care and therefore will need placements that can meet their needs – **including more male foster carers**
- Of those likely to require a placement, we expect to see the number of babies reduce slightly, the numbers of 1-4 year olds and 16-18 year olds reduce and an increase in numbers of children aged 5-15. **We are therefore likely to need more placements for the 5 -15 age group and expect a high proportion will have a plan for long term fostering. We will need to improve likelihood of matching by recruiting and retaining and commissioning carers who reflect the demographics of our children (more from global majority backgrounds), and increase family finding activities.**
- Based on linear projections we expect our need for foster care to increase by approx. 14 places, however we are aware that currently we have not been able to identify suitable foster carers for some children whose plan is for foster care (approx. 70 places based on current patterns). **Therefore approx. 85 additional foster care placements are required to 2024, as well as replacing any NCT carers who retire. This includes those that can support children with more complex needs and those that can care for children in an emergency**
- We expect our need for residential placements to remain steady/ decrease slightly, however we are aware that currently we have not been able to identify suitable care homes for some children whose plan is residential care (approx. 20 places based on current patterns). **We will have an additional 11 places available in Q3 22/24, including 6 emergency places and are seeking capital funding and properties for additional NCT provision**
- In addition, given the current challenges in finding the right residential care for children with more complex needs we know we need to increase access to residential care that can support:
 - Children who need to access care in an emergency/ crisis situation
 - Children who require a solo or dual placement
 - Children with Social Emotional Mental Health (SEMH) needs
 - Children with disabilities including behaviour that challenges others
 - Children with disabilities with complex health needs
 - Children at risk of or experiencing violence, gangs, exploitation, including those returning from custody, secure remand, secure welfare
 - Children requiring step down or prevention from hospital with needs including trauma, suicide attempts/ ideation, self-harm, eating disorders, gender dysmorphia

We have plans in place to secure capital funding to increase NCT and external provision to meet this need and will need to review plans if this is not forthcoming.

- We do not want to continue being in the situation where we have to use unregulated/ unregistered provision for under 16s or over 16s where this is not in line with their care plan. In addition to increasing access to places that can meet the needs of children that we struggle to find regulated places for, **we need to continue to work across the system to reduce placement breakdowns and emergency / crisis (same day) placement requests**
- We expect our need for supported accommodation for 16 and 17 year olds to decrease by approx. 19 places, however our number of care leavers is expected to increase by approx. 127 by March 2024 and it is expected a proportion will continue to require supported accommodation, including those providing pathways to independence / training
- We will need to continue to support ISA providers to prepare for Ofsted registration (from April 23) and closely monitor the impact on sufficiency and costs of regulation, adjusting plans accordingly.
- We need to continue to work with colleagues in Housing to ensure there is suitable housing available for our care leavers to move on to their own tenancies
- We need to continue to improve our commissioning (understand, plan, do and review) to ensure we are making the best use of our total resources to improve outcomes for children and families in the most equitable, efficient, effective and sustainable way.

7. Sufficiency Strategy 2022 – 2025 Our 4 Priorities



Strengthening Families

Key Outcome: Children are able to remain within the care of their families and/ or network where this is in their best interests



Finding a Place Called Home

Key Outcome: Children are able to live in a setting that meets their needs and they benefit from improved outcomes



Promoting Stability & Permanence

Key Outcome: Children feel safe and secure in their home and their placement is stable



Pathways to independence

Key Outcome: Children and young people thrive and are on track to becoming independent

The delivery of our 4 key priorities will be enabled by:



Improved commissioning

We will use the total resources available for children, young people and families in order to improve outcomes in the most equitable, efficient, effective and sustainable way⁵



Strengthening Families

Key Outcome: Children are able to remain within the care of or return to their families and/ or network where this is in their best interests

What we will do:

This priority will be delivered through activity already identified in:

- NSCP's Early Help Strategy & action plan
- NSCP's Neglect Strategy & action plan
- NSCP's Exploitation Strategy & action plan
- NCT's Business Plan: *Strong, relationship based practice & Healthy Partnerships*
- NCT's Children in Care and Care Leavers Strategy Live Safe, Be Safe priority

In addition, we will:

- Continue to review the impact of the Pause programme in enabling women who have previously had children removed to improve their outcomes, and seek continuation of funding to continue beyond 2025 if it continues to have successful impact on preventing children from coming into care

⁵ Commissioning Support Programme, 2010

- Continue to review the impact of our commissioned targeted safeguarding support in achieving positive impact for children who are subject of children in need and child protection plans, and re-commission if it continues to have successful impact (current contract ends 31 Mar 24).
- Continue to review the impact of our commissioned targeted family support/ early intervention for children under 5 in Corby and re-commission if it continues to have successful impact (current contract ends 31 Mar 24).
- Implement re-designed model of short breaks and respite from children with disabilities from Apr 23 to improve access to impact of support for children with disabilities to remain within the care of their families or current placement.
- Commission respite care, particularly for teenagers, to prevent the need for children to come into care if a family is in crisis

How will we know if we've made a difference?

- Feedback from children, young people and families
- Our rate of children in care will reduce to reflect national / statistical neighbour averages – *NB we expect this will take place after a period as we know that strengthening early help is likely to lead to an initial increase in numbers of children in care*
- The need for emergency and crisis placements will continue to reduce from 2022 level



Finding a Place Called Home

Key Outcome: Children are able to live in a setting that meets their needs and they benefit from improved outcomes

What we will do:

Fostering:

- Deliver the NCT Fostering Improvement Plan with the aim of securing a 'good' Ofsted judgement
- Work with WNC and NNC to implement capital programme for NCT foster carers' homes to increase number of placements / placements for siblings and / or children with disabilities
- **Recruit NCT foster carers** in line with annually set targets. For 2022/23 this is 40 new households (specifically targeting carers for children aged 8+ and seeking to increase proportion of male and global majority carers) including:
 - 5 resilience carers
 - 3 households that can care for sibling groups
 - 5 households that can provide short breaks for children with disabilities
 - 3 households that can provide parent and child placements
 - 4 households who can offer emergency provision
- Improve the retention rate of **NCT foster carers**. Plans to be delivered in 22/23 include:
 - Review of financial allowances and enhanced payment scheme
 - Deliver revised training package
 - Introduce specific out of hours support

- Propose council tax reduced payment scheme
- Increase support for carers who are 'on hold'
- Expand therapeutic support to deliver proactive intervention
- Commission **external IFA emergency carer provision** in 22/23
- **Build and improve relationships with external IFAs** so that they are more aware of the needs of our children and so that we become a commissioner of choice
- Re-open our **IFA framework** on an annual basis and commission new framework for April 2025

Children's Homes:

- Work with WNC and NNC to open min. of 3 new NCT children's homes by 2025 to support children with more complex needs (children with disabilities and behaviour that challenges, mental health needs, those subject of exploitation)
- Review impact of additional block contract out of county and emergency homes – due to be operational in Q3 22/23
- Secure capital funding to open one externally delivered home by 2024
- **Build and improve relationships with external children's homes providers** so that they are more aware of the needs of our children and so that we become a commissioner of choice
- Re-open our **children's home framework** on an annual basis and commission new framework for April 2025
- Develop long term sustainable partnership in the re-commissioning of our **children's homes block contract**
- We will continually improve oversight of any unregulated/ unregistered placements that have had to be made for under 16s or over 16s where this is not in line with their care plan
- Support local providers of unregistered / unregulated provision to apply for Ofsted registration for children's homes.

Accommodation for Care Leavers:

- Continue to review impact and re-commission our 19 training flats for April 2024
- Open additional commissioned training flats in Summer 2023
- Review use of HMOs by Apr 23
- Support providers to be able to register with Ofsted by Apr 23, monitor likely impact on sufficiency and cost and take appropriate mitigating action

How will we know if we've made a difference?

- Feedback from children, young people and families
- All children will be able to live in the same type of placement as per the type requested, in line with their care plan
- We will not have to use unregulated/ unregistered provision for under 16s and over 16s where this is not in line with their care plan
- The % of children in care with 3+ moves in previous 12 months will reduce from Aug 22 figure of 13.1%
- We will reduce the number of high cost placements



Promoting Stability & Permanence

Key Outcome: Children feel safe and secure in their home and their placement is stable

What we will do:

- Continue to work across the system to intervene earlier and reduce need for police protection orders and crisis (same day) placement requests
- Taking actions to reduce placement breakdowns and need for emergency placements, informed by analysis completed on this in 2021 and 2022 (effective earlier intervention with families, effective multi disciplinary team and placement stability meetings, more effective and efficient placement request and brokerage processes, additional capacity to support NCT IFA and external placement stability)
- Monitor the impact of additional family support capacity intended to improve placement stability of NCT fostering and external placements (operational from Q3 22/23)
- Regular reviewing the impact of placement support packages
- Continue to monitor impact of public health funded therapeutic interventions for children in NCT foster care and identify means of mainstreaming this support if it continues to have positive impact
- Improving our understanding of the impact for children of therapeutic support within placements

How will we know if we've made a difference?

- Feedback from children, young people and families
- % of children in care for 2.5+ years who have been in the same placement for for 2+ years/ placed for adoption will increase from Aug 22 figure of 68.1% and remain in line or reach above comparators
- The % of children in care with 3+ moves in previous 12 months will reduce from Aug 22 figure of 13.1%



Pathways to independence

Key Outcome: Children and young people thrive and are on track to becoming independent

What we will do:

- Develop our leaving care data set to inform a needs analysis for the care leavers population
- Further analyse young people's needs and co-design commissioning models to further develop care leavers accommodation based on pathways; including development of supported lodgings

- Working with social housing providers to develop stages of supported accommodation from stage 1 working with young people to develop resilience and improve health and wellbeing, stage 2 training flats for independence to stage 3 young people moving onto their own tenancy with floating support.
- Develop our staying close offer to provide additional support for young people moving on from children's homes.
- Developing the current ISA model for 18+ with the DWP (Department for Work and Pensions) and ISA providers so that young people are able to develop independence skills through being supported to claim benefits and seek work.
- Explore review of Staying Put arrangements to become 'opt in'; Pre-tenancy agreements with private landlords, guarantor schemes (recommendation from Independent review of children's social care)
- Further develop strategic relationships with the West and North Northamptonshire Housing departments to plan for the future and ensure sufficient housing for young people to move onto; and review the impact of the joint protocol for Care Leavers Housing
- Continue to develop our Mental Health Support Offer for Care Leavers, review the impact of public health funded provision and seek mainstreaming of this by 2024 if continues to have impact
- Review our current offer to support care leavers into education, employment or training to inform future commissioning by Apr 23

How will we know if we've made a difference?

- Feedback from young people
- The proportion of care leavers in suitable accommodation will maintain or improve upon Aug 22 level of 92.5%; and above statistical neighbour and national averages
- The proportion of care leavers in EET will maintain or improve upon Aug 22 level of 60.6%; and above statistical neighbour and national averages



Improved commissioning

We will use the total resources available for children, young people and families in order to improve outcomes in the most equitable, efficient, effective and sustainable way⁶

What we will do:

We will make improvements at each stage of the cycle, ensuring that we are taking a relationship based approach to commissioning:

Understand

- We will review children in care and care leaver forecasts every 3-6 months
- We will regularly analyse the range of data available within NCT to us to give us to better understanding of demand and use of placements
- We will review our demographic analysis after West and North unitary councils have produced and published their Joint Strategic Needs Assessments

⁶ Commissioning Support Programme, 2010

- We will better understand the views of our children and young people through a broader and deeper range of engagement with them; including consideration of any variation for those with protected characteristics, and co-develop commissioning projects with them
- We will work to develop information on protected characteristics by using data available on Care First and estimates based on census data to create a better understanding of our children in care population beyond age, gender and ethnicity which will enable us to better understand and consider what type of support we need to provide and commission for our children

Plan

- Our Sufficiency action plan will remain a live document, adapted over the course of the strategy as needs and/ or markets change, with progress overseen by the Sufficiency Board
- We will review NCT foster carer recruitment targets on an annual basis
- We will allow sufficient time to undertake commissioning projects
- We will produce market position statements and engage with the market prior to commissioning / re-opening frameworks to help providers plan for the needs of our children
- We will plan for any changes regarding regional commissioning and provision of placements that is introduced by government in response to the Independent Review of children's social care

Do

- We will fully implement improvements to our placements brokerage processes and review the impact
- We will commission a digital brokerage solution to improve the efficiency of our systems and reporting, reducing waste and enabling brokerage team to spend more time with providers
- We will focus on developing and improving relationships with external providers
- We will implement the revised joint funding protocol for placements

Review

- We will improve our understanding of experiences and outcomes for children in placements
- We will continue to utilise national and regional information to benchmark our progress and develop plans
- We will continue to regularly review packages to ensure provision meets the needs of children and young people and achieves the best value for money

How will we know if we've made a difference?

- Improved commissioning will enable us to achieve the four priorities for children and young people
- We will improve the value for money achieved in placements
- The proportion of partner contributions to placements will be in line with other areas

Appendix 1 – Summary of our delivery of 2020-2022 Sufficiency Strategy and impact for children

Improved Placement Stability	
<p>Compared with 2020/21, a higher proportion of children who have been in care for 2.5 years or more have been living in the same placement for 2+ years or placed for adoption (68% YTD at August 2022 compared with 63% in 2020/21), bringing us in line with our statistical neighbours.</p> <p>13% of children leaving NCT's care obtained permanence through a special guardianship order between Jan – June 22, this compares with the latest available data (2020/21) of 14% statistical neighbour and national averages</p> <p>This means more children have had stability of care which enables them to feel safe, secure and achieve outcomes</p>	
<i>What we did</i>	<i>Impact for children and young people</i>
<p>Following an analysis of placement breakdowns, we have identified a range of actions to improve placement stability and reduce the need for emergency placements which are being taken forward by managers across our services</p>	<p>More children will benefit from stability in their care</p>
<p>Created additional family support worker posts to support stability of NCT fostering placements, and commissioned a pilot to support stability of externally delivered placements</p>	<p>When these initiatives are operational (expected Q3 of 22/23) we expect placement breakdowns and emergency placement requests to reduce, this will improve stability for children</p>
<p>We implemented our Public Health funded project to support the mental health of children in NCT foster care which has had a positive impact on placement stability, and have secured funding to continue this to Dec 2023</p>	<p>Of 65 children who had received therapeutic support directly/via carer at end June 22, 6 (9%) had experienced a placement breakdown in comparison with the pre-project baseline of 30%<.</p>

Improved outcomes for children and young people	
<i>What we did</i>	<i>Impact for children and young people</i>
<p>Implemented an improved early help assessment tool. Early Help Strategy, board and networks developed across the multi-agency partnership.</p>	<p>Families are more likely to receive the right support at the right time, to prevent issues from escalating and enabling children to remain in the care of their families</p>

Improved outcomes for children and young people	
Reviewed the 16 – 17 Homelessness Joint Protocol to improve joint working and clarified responsibilities to young people	Once implemented, we expect more young people will receive the support they require, when they require it and the voice of the young person will be clearer in decision making about their future and legal status
We developed the Family Solutions (edge of care) service as part of our Children and Family Support Services (CFSS) to support families to stay together and we have supported the reunification of children to their families where this is in the best interests of the child.	<p>More children are being supported to remain with their families or return to their families after a period of being in care where this is in their best interests</p> <p>Between June 21 and June 22 CFSS worked with 93 children who were specifically identified as risk of care. 79 (85%) were able to remain in the care of their families.</p> <p>In 2020/21, the % of children returning to parents was 8%. This has doubled from 4% in 2018/19. The England average in 2020/21 was 7% and the regional average was 6%. As a the end of June 22, 74 children had left care in the last 6 months to return to their parents/ relatives, this was 37% of all children whose care episode ceased in the period</p>
<p>The Pause programme, funded by Big Lottery via Public Health until 2025, has worked with 24 women who have had 89 children removed into care, this equates to 3.7 removals per women. 35 women are being worked with from Q1 22/23</p> <p>14 women have completed the programme with 0 live births and 0 children taken into care.</p>	Women who have previously had children taken into care have been able to take a pause and improve their outcomes before having another child
Positive outcomes have been achieved for children and families supported by our commissioned targeted services: targeted family support/ early intervention for children under 5 in Corby and family support and MST for families known to safeguarding services	<p>Over 70% families accessing support at Corby Children’s Centre reported reduction in isolation, increased understanding of child development and relationship with their child, greater level of support from community services (Q1 22/23)</p> <p>96.5% of children supported by MST remained living at home at the end of the intervention</p>

Improved outcomes for children and young people	
	12 month follow up of families supported by Action for Children: 84% of children remained in the family home; 75% were no longer under a Social Care plan
<p>Family and friends fostering is always considered when case planning to enable a child to remain within their existing network where possible.</p> <p>At the end of July, there were 175 children in Family and Friends placements, which is a total of 38.8% of all fostering placements.</p>	<p>Children and young people who stay within their family or friends network have better outcomes than those in other placements and stability of these placements is good if not better than other foster placements (Family and friends foster care (England) The Fostering Network, 2022).</p>
<p>We reviewed foster care provision that can support step down from residential and children with more complex needs and have mainstreamed our NCT Resilience Foster Carer scheme as this has shown positive outcomes for children</p>	<p>In utilising our NCT Resilience foster care scheme for children and young people with more complex needs children's outcomes are more likely to improve</p>
<p>We have improved procedures for when unregulated placements absolutely have to be used, improved risk management, quality assurance and senior management oversight.</p>	<p>Children and young people living in unregulated/ unregistered provision where this is not in line with their care place are safe</p>
<p>We partnered with an external organisation, to provide an objective review of our commissioning and brokerage and are implementing a range of improvements to make our processes more effective and efficient.</p> <p>We have implemented a weekly Placements Planning Forum to review and prioritise the week's placement searches</p>	<p>The right placements for children will be found in a more timely manner</p>
<p>We have focused on establishing and improving relationships with local and specialist external providers that can support the needs of our children. Through 1-2-1 commissioner / provider relationships, regular communications and provider forums covering local and specialist topics</p>	<p>We are more likely to secure placements that can meet the needs of our children</p>

Improved outcomes for children and young people	
Our partnership with Homes to Inspire (H2I) and Prospects (both part of Shaw Trust) is enabling better co-ordination of support to improve outcomes for children living in our block contract homes	This is a relatively new initiative and we expect the education, employment and training outcomes of the children receiving this support will be maintained at a good level or improved
<p>In addition to Ofsted inspections,</p> <p>Regular monitoring of the external Residential Children's Homes, Fostering and Independent Supported Accommodation frameworks demonstrates positive outcomes for our children and young people. ISAs are being supported to prepare for Ofsted registration from 2023</p> <p>We have improved performance monitoring within NCT's IFA. Performance of NCT homes are monitored through an external regulation 44 visitor who provides monthly reports with recommendations/ actions and internal monitoring</p>	<p>Children's outcomes are supported as any concerns relating to provision is addressed in a timely manner and improvements achieved</p> <p>The ISAs we commission work towards the same set of key performance indicators and outcomes for care leavers which help the young person develop independence skills.</p>
<p>To support pathways to independence for care leavers we have:</p> <ul style="list-style-type: none"> - Resumed NCT's Independent Living Programme in July 22 following the pandemic - Established West and North Unitary Council Accommodation and Transitions Panels to ensure good advanced planning so that the right permanent homes are found - Agreed the Care Leavers Joint Housing protocol July 22. 	<p>Between July – Sept 22, 8 young people successfully completed the Independent living course and said that they felt more prepared for independence into adulthood as a result</p> <p>We expect the impact of the accommodation and transitions panel and Care Leavers Joint Housing protocol will enable more care leavers to move on to independence in a time that suits their needs, homelessness to be prevented and more effective management of housing crises for young people where they occur</p>

Improved Sufficiency of NCT Fostering	
<i>What we did</i>	<i>Impact for children and young people</i>
We have implemented our NCT fostering marketing and recruitment campaign including resilience, mainstream, Family Link, emergency, and short-term carers.	More children and young people can be cared for by NCT foster carers where this in line with their care plan and matching

Improved Sufficiency of NCT Fostering	
<p>At the end of August 22 there were 207 approved 'mainstream' fostering households as part of NCT's IFA. There has been a net gain of 9 additional households over the previous 2 years which has seen a national trend of carers leaving the profession post pandemic. In addition, there are 122 approved Family and Friend Carers</p> <p>A review of the approval status to maximise more internal foster homes for children has resulted in 15 additional placements</p> <p>We have also developed plans to increase the retention rate of NCT carers, which will be implemented during the second half of 2022/23</p>	
<p>Increasing the skills and number of NCT foster carers able to support children with more complex needs through our Resilience foster carers scheme. By end of Mar 22, 5 children were being cared for by 5 resilience carer households.</p>	<p>More children and young people with more complex needs are able to be cared for in a family setting where this is in line with their care plan</p>

Improved Sufficiency of Placements	
<p>73% of our children in care were placed in foster care at end June 22, in comparison with 71% in 20/21. The latest comparator data is 20/21 when 71% of both statistical neighbour and England averages were 71% children in foster care. The proportion of children living in residential care has remained consistently below statistical neighbour and England averages since 20/21</p>	
<i>What we did</i>	<i>Impact for children and young people</i>
<p>Reviewed the statements of purpose of NCT and block contract homes to better meet needs of our children.</p>	<p>Children and young people's needs can be better supported in local provision that is solely available for NCT children in care</p>
<p>Northamptonshire's Framework for Children's Homes and Independent Fostering Agencies (IFA) was established in 2020 and has been opened twice for additional providers to join. We have 48 children's home</p>	<p>More providers provide more placement options for children and young people, so they can be placed in homes that match their needs.</p>

Improved Sufficiency of Placements	
providers and 43 IFA providers currently on our framework following the reopening of the framework in July 22.	
As at Sept 22, we have secured an additional 11 residential care beds for the sole use of NCT by the end of 2022, including in emergency/ urgent situations (by commissioning 2 new emergency homes within the county and adding an additional out of county home to the block contract)	Once operational, we will have better access to residential care that can meet the needs of our children and young people
Submitted a partnership bid to the 2022 DfE Capital funding to provide a home for children with mental health / behavioural needs. We are working with NNC and WNC to secure capital funding and additional council owned properties to create additional NCT residential care and care leaver accommodation that will meet needs	If successful in securing funding, we will have increased access to local residential care and independent supported accommodation that can meet the needs of our children and young people
We have revised the criteria for our commissioned training flats for care leavers so that the referral process is more accessible to young people. This has resulted in higher levels of utilisation	More care leavers are able to live in our training flats which help them to achieve positive outcomes
We have commissioned an external provider to deliver supported accommodation for care leavers with additional needs. This will provide a steps to independence providing more intensive support to develop skills to move onto training flats and then to own tenancies. In development for delivery from summer 2023	Once operational, more care leavers with additional needs will receive support that helps them to achieve independence

Reduction of Placement Costs	
Achieving better value for money and appropriate contributions from partner agencies has helped mitigate some of the financial pressures experienced due to rising costs, inflation and a highly competitive market. This means we have been in a better position to manage the financial impact of increased demand for placements.	
<i>What we did</i>	<i>Impact for children and young people</i>
Children and young people's placements have been reviewed to ensure they are receiving the right level of support/care at the right time and their needs are supported as they change and develop in their placement.	Children and young people are receiving the right care/ support for their needs.

Renegotiation of packages achieved savings of £1.2m in 21/22 and £480k Apr – Aug 22.	
We commissioned an external review joint funding arrangements to ensure appropriate shared financial responsibility for placements	Children and young people are receiving the right care/ support for their needs.

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Northamptonshire Children's Trust

Commissioning Strategy & Framework 2021/25

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1. Introduction

At Northamptonshire Children's Trust we are dedicated to ensuring children, young people and families are at the heart of all we do – in every action we take and every decision we make. We know that what we do today affects children and young people's tomorrows and we are focused on helping children and young people to live safe, be safe; fulfil potential; develop resilience and enjoy good health and wellbeing.

Alongside the Early Help, Youth Offending & Social Care services that we deliver to achieve these outcomes, we also commission other organisations to work alongside us, to deliver support and achieve outcomes for children, young people and families on our behalf. We also commission 'enabling' goods and services that help our staff to work well with children, young people and families.

Northamptonshire Children's Trust's Commissioning Strategy and Framework sets out our overall vision and plan to use commissioning to contribute to the delivery of our Business Plan, and to improve outcomes for children, young people and families and to support our staff to do their work effectively and efficiently.

The Commissioning Strategy and Framework is also intended to inform our Board, stakeholders, partners and our staff of the purpose of our commissioning; our expectations of commissioned services; how they align with and support our service delivery function; our approach to commissioning; what good commissioning looks like; what we intend to commission over the next four years and how we will know what difference we have made for children, young people and families in Northamptonshire as a result.

In delivering this Strategy & Framework we will contribute to the achievement of the Trust Business Plan – to improve and sustain the experiences and outcomes for children, young people and families who need our support, and to make the best use of our resources.

What is commissioning?

Commissioning is the process for deciding how to use the total resources available for children, young people and families in order to improve outcomes in the most equitable, efficient, effective and sustainable way¹

Commissioning provides a framework to understand the outcomes, needs and experiences of a child or group of children; to plan the best approach to improve or sustain good outcomes; to do something to improve or sustain outcomes; and to review what impact has been achieved. However, like everything we do in the Trust, we know the best results are achieved by taking a strengths based, relationship based, collaborative approach with children, young people and families at the heart of all we do – in every action we take and every decision we make.

When we commission we follow the 4 stage cycle shown below. Effective commissioning absolutely needs to be led by voices of children, young people and families and by the practitioners who work with them, supported side by side by skilled commissioners who have children, young people and families at the heart of all they are doing.

¹ Commissioning Support Programme, 2010

1. Introduction (cont)

Our Commissioning Cycle



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2. Northamptonshire Children's Trust Strategic Framework



Strategic Framework

Vision

**Children, Young People and Families at the heart of all we do
- in every action we take and every decision we make.**

Our Commitment

(co-produced with children and young people)

**What we do today affects your tomorrow, we promise to
walk side by side with you**

Outcomes Framework



Conditions for Success



Like everything we do in the Trust, our commissioning activity needs to align with our Vision and our Commitment and focused on achieving the outcomes identified in our Strategic Framework.

2. Northamptonshire Children's Trust Strategic Framework (cont)

Our **Values** underpin all of our commissioning activity:

- Be child focused and work with the whole family
- Make a difference with trust and integrity
- Concentrate on the best solution
- Act with respect, kindness and compassion
- Communicate well
- Do the best job of your life every single day

To meet the challenges faced by communities, we will have a relentless focus on our impact and outcomes for children and young people based on local needs and priorities. Our Business Plan states that to achieve this, we will:

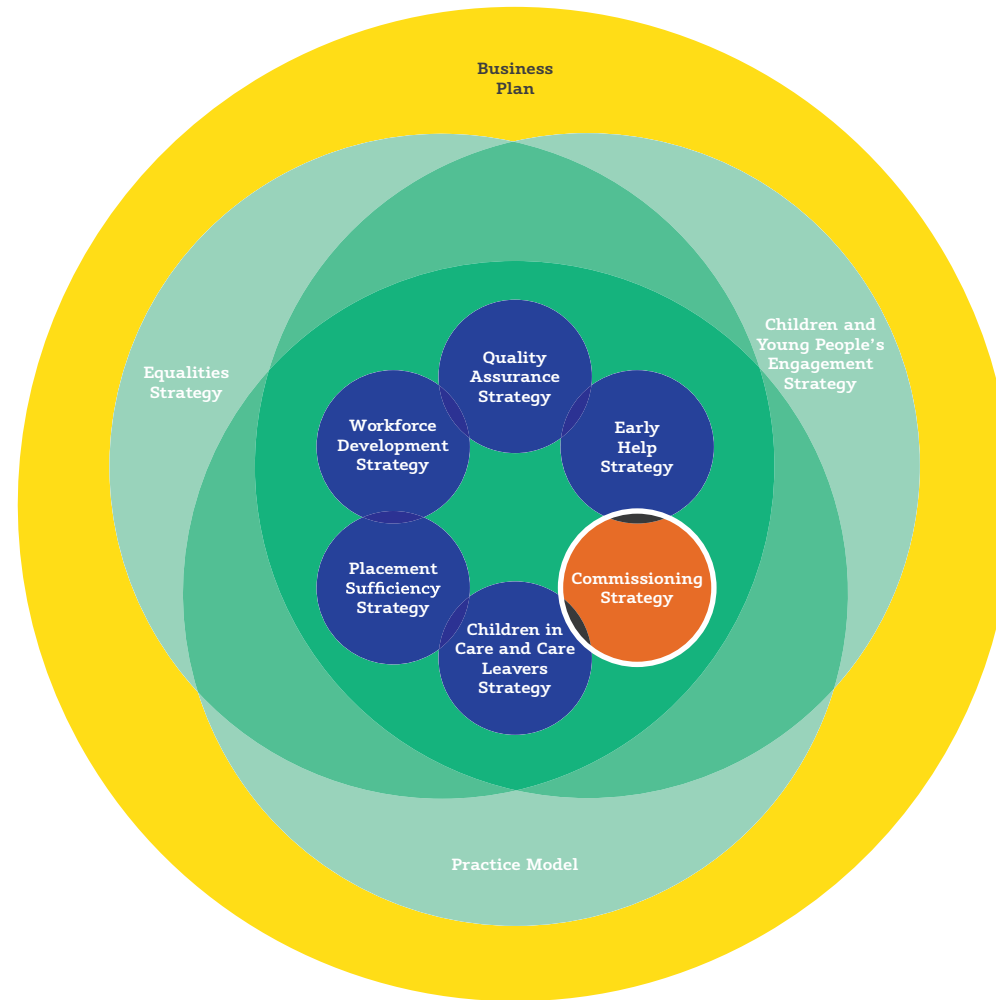
- Ensure that the voice of children and young people drives all of our practice.
- Strengthen relationships with parents and carers, and our service offer will be shaped by them and by the direct involvement of children and young people. The co-production of effective solutions to local priorities, including financial challenges, will be evident in our successful delivery of the business plan, as well as our response to emerging issues.
- Focus our early help services on building resilience in families so that they are better able to help, support and protect their children without the need for statutory interventions.
- Consistently use reflective, collaborative and strengths-based approaches to working with the whole family so that parents are able to make positive and lasting changes to the care they provide to their children.
- Invest in integrated services and joint commissioning with our partners, bringing together our collective ideas, talent and resources to better meet the needs of children and young people, especially those with the most complex needs.
- Promote strong and meaningful relationships with our partner organisations and our whole-system approach to improving services and outcomes for children and young people.
- Have established strong and financially stable foundations.

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And we are focused on contributing to our **Strategic Priorities** through our commissioning activity:



2. Northamptonshire Children's Trust Strategic Framework (cont)

Our Commissioning Strategy and Framework is one of our core strategies to deliver the aims of our business plan.



3. Achieving Effective Commissioning

The purpose of our commissioning activity is to achieve and sustain the best outcomes and experiences for children, young people and families, and to support our workforce to do their work effectively and efficiently. We want to achieve the best use of the resources available to us and achieve excellent value for money.

Our commissioning activity relates to the children, young people and families who we work with at different points within the statutory framework; as well as enablers – these are goods or services that support staff to work effectively and efficiently. As such, our commissioners will be working alongside practitioners and partners with expertise in these areas to ensure that what we commission is in line with, complementary and adding value and is embedded within our practice so that the best use is made of our resources.



We will achieve effective commissioning by ensuring:

Throughout the Commissioning Cycle:

- Our commissioning is led by the voice of children, young people, families and the practitioners who work with them; facilitated and supported by skilled commissioners
- We work collaboratively with children, young people, families, practitioners, partners and providers throughout the commissioning cycle, co-producing and jointly designing services to maximise creativity and innovation whilst ensuring that services are fit for purpose and delivered through the most effective means to achieve results.
- We make full use of the commissioning cycle (understand, plan, do and review). We will forward plan and build in sufficient time for each stage so that we do this effectively and with partners, where applicable.
- We draw not only on our strengths and assets but also on those of children and families, our partners, providers and the community to work together to make things better for children, young people and families and enabling them to thrive.

3. Achieving Effective Commissioning (cont)

In the 'Understand' Stage

- We develop our understanding of the assets and needs of children, young people and their families and also consider what these may be in the future.
- We seek to ensure families can access the right support at the right time ensuring support is provided as soon as a problem emerges so that it does not get worse.

In the 'Plan' Stage

- We always explore whether it is better to collaborate with partners to achieve greater impact and better value for money. We will create joined up services with partners where this makes sense for families and we will seek to pool funding to work together for greater effect.
- We evaluate all options to identify the most suitable means of improving outcomes.

In the 'Do' Stage

- We work proactively with potential providers in the market place to help them develop skills for bidding, capacity, capability and innovation that will deliver the most benefit to children, young people and families.
- Where our commissioning involves delivery of services by external organisations, we will work collaboratively and in partnership. We will ensure that there are smooth processes in place so families receive the right support at the right time, and that commissioned and in house services work side by side as part of the Northamptonshire

Children's Trust family.

- We consider how further social value can be built into service delivery to provide additional economic, social or environmental benefit.
- We will be transparent and fair in commissioning decisions. We ensure that we meet legal and policy requirements and we use reasonable procurement processes and timescales.

In the 'Review' Stage

- We will use a variety of ways to understand the impact and what difference it has made (see our 'Commissioning Cycle Activities' on page 13 for more details).
- We ensure that, not only are our commissioned providers meeting their legal obligations with regard to Equalities, but that they are committed to ensuring that everyone is included, has a voice and is respected. This includes their own staff, the professionals that they work alongside and the children, young people and families that they support.
- We will use the review stage to inform future commissioning. We will stop doing things that aren't having an impact and seek new solutions.

4. Expectations of our Commissioned Services

We have the same expectation for services whether they are delivered from within the Trust or by a commissioned provider.



Making a difference

All activity is focused on making a difference for children and achieving the outcomes and ambitions of our Vision.



Collaboration

Services will work collaboratively as part of the Children's Trust family to improve lives of our children, young people and families.

Children, young people and parents/ carers are treated as partners and are involved actively in the planning, delivery and evaluation of support.

Providers contribute to relevant partnership groups and panels and share information and intelligence appropriately to improve practice and outcomes for children.



Safeguarding

Children are safeguarded effectively, Working Together to Safeguard Children statutory guidance and Northamptonshire's Safeguarding Children Partnership (NSCP) policies and procedures are followed.

4. Expectations of our Commissioned Services (cont)

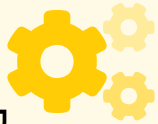


Equality & Diversity

Equality and diversity policies and procedures are implemented.

Equal opportunities are advanced, discrimination tackled and good relations are fostered between people of different characteristics and backgrounds.

Services and support are easily accessible from a child and/ or parent/ carer perspective and adapts to meet special needs of children and parents/ carers.



Doing what works

Work is designed and delivered in line with evidence of what works.

Support builds on children's and families' strengths and assets and enables them to develop positive connections in their community, resilience and sustained outcomes.

Services working with families will use the Signs of Safety practice model.

Assessments, planning and progress reviews are good quality and timely and children and their parents/ carers are involved actively in them



Knowing what difference we've made

Accurate performance and impact information is used to track progress of children and to develop and improve the service; and relevant information is shared with commissioners.

Providers and commissioners will work together to creatively identify solutions to any challenges in achieving outcomes and delivering good value for money.

Providers and commissioners will jointly quality assure activity.

The best use is made of resources.

5. How We Commission

The Commissioning and Strategy Service provides commissioning support and expertise in the Trust, co-ordinating commissioning projects and undertaking work at all stages of the commissioning cycle, working with partners where applicable. Commissioners will work side by side with practice leads for each commission; they are the expert practitioners with responsibility for ensuring that all stages are informed by professional and operational expertise and that commissioned services are embedded within the system. We will support our commissioners and service leads to continually develop skills and expertise in commissioning, leadership and change management. Equally important are the children, young people and families we work with; they are also key partners throughout the commissioning process and will be supported and enabled to contribute and participate alongside us. Decisions regarding procurement, grant funding and contract awards are taken in line with the Trust's scheme of delegation.

Our commissioning takes place at different levels:

- **Individual** child or family (i.e. care packages)
- **Groups** of children or families in similar circumstances or with similar needs - this can vary from relatively small in number or spend to high (ie mental health support for care leavers to foster placements for children in care)
- Goods or Services that **enable** our staff to get on with their work and do their work well

The figure on page 13 shows the commissioning cycle and the range of activities at each stage; which will vary according to the nature and size of the commission. 'Enabling' Goods or Services may only require a procurement (purchasing) process rather than a full commissioning process.



Sometimes, our commissioning at the individual level is reactionary. This can be for a variety of reasons, such as changes in demand, circumstances, or emergency situations. By its nature this means we are not always able to undertake work at the understand and plan stages, and our choices can be more limited when responding quickly. As part of our strategy we will closely monitor our reactionary commissioning to identify themes and patterns and identify how a more strategic and planned approach can be applied.

5. How We Commission (cont)

Commissioning Cycle Activities as a single organisation or with partners



5. How We Commission (cont)

Throughout the cycle we also consider the six stages identified by the Commissioning Academy (2013)

- What's the question?
- Get to know and work with your customers
- Define the outcome and priorities
- What will it look like?
- How will you get there?
- Measuring the impact

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6. What We Commission

We commission services to support children, young people and families with a range of needs, to work alongside our practitioners and in-house services to improve outcomes.

As at April 2021, the following support is commissioned by the Trust:

Page 715



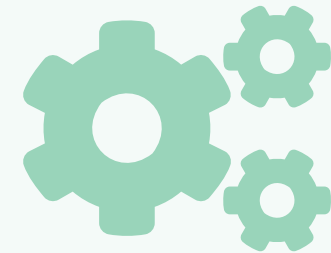
Support commissioned for individual children, young people or families

Support is spot purchased, procured via a framework or bought with a personal budget. Some spot purchasing is done directly by operational teams



Support commissioned for groups of children, young people or families

Support is commissioned via a 'block' contract for an identified number of children and families






Goods or services to enable staff to work effectively and efficiently




Goods or services are spot purchased, procured via a framework or via a block contract

6. What We Commission (cont)

Family Support Services & Youth Justice




Commission	Annual contract value or approximate annual spend	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Targeted Support for children under 5 and their families in Corby</p> <p>Page 716</p>	£512,000	150	<ul style="list-style-type: none"> • Improve outcomes for children and families and prevent more serious issues arising through outreach and early help • Early Help for parents and children during pregnancy and first 2 years of a child's life; regarding domestic abuse/alcohol abuse and mental health; to support Parenting / keeping children safe/ improving the family routines • Identifying and providing access to early years support for children with Special Educational Needs and Disabilities • Being a hub for the local community, building social capital and community cohesion • Education and Learning outcomes for children and parents
 <p>Employment, education and training support</p>	£975,000	400 young people at any one time	<ul style="list-style-type: none"> • Increase in number of young people who are in education, employment and training. • The percentage of children and young people in Northamptonshire that are not in education, employment or training is now at its lowest level.
 <p>Mentoring for adolescents**</p>	Total funding for this project is £253,370 £35,000 used to commission training and equipping of mentors	300 young people will be supported as mentees or as beneficiaries of our work in schools/colleges.	<ul style="list-style-type: none"> • Positive impact on mentees' confidence and the enhancement of a range of skills • Reduce risky behaviours, exclusions, offending and victimisation amongst young people

6. What We Commission (cont)

Commission	Annual contract value or approximate annual spend	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Support for young carers ***</p>	<p>£120,000</p>	<ul style="list-style-type: none"> • 330 assessments for young carers • 200 young carers supported through group activities 	<ul style="list-style-type: none"> • The service aims to give young carers the same life opportunities as their peers and feel supported at school/ college.
 <p>Appropriate Adult Services</p>	<p>£30,000</p>	<ul style="list-style-type: none"> • 360 young people 	<ul style="list-style-type: none"> • Appropriate Adults safeguard the interest, rights, entitlements and welfare of children who are suspected of a criminal offence.
 <p>Family Support Services</p> <ul style="list-style-type: none"> • crisis intervention • medium term support • multi-systemic therapy 	<p>£910,000</p>	<ul style="list-style-type: none"> • 250 families 	<ul style="list-style-type: none"> • Prevent family breakdown and/ or children needing to come into care • Enable parents or carers of a young person to support positive change in relation to behaviour that challenges - Majority of young people have been able to remain at home and there were no new arrests following intervention • Improved parenting skills and confidence • Enable families to overcome and manage challenges such as domestic abuse, drug misuse, financial difficulties



6. What We Commission (cont)

Children in need and child protection

Commission	Annual contract value or approximate annual spend	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 Family group conferencing	£419,000	Approx. 20 families	<ul style="list-style-type: none"> To reduce the number of children and young people coming into care at the Public Law Outline (PLO) stage
 Therapeutic support/ assessments	£220,000	120 Assessments 60 Therapeutic support	<ul style="list-style-type: none"> Informs and supports the care planning process for children and the family
 Support provided under s.17 Children Act 1989	Varies	Varies	Varies




6. What We Commission (cont)

Children in Care, Care Leavers, Adopted Children

Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Fostering, children's homes and independent supported accommodation*</p>	<p>£58,590,000 (Total value allowed within frameworks. Spend varies) This is broken down as follows: £18m: Framework for Independent Supported Accommodation and spot purchases £35m Children's Home and Fostering Framework and spot purchases £ 5,143,193 Block Contract Children's Homes £ 446,133 Care Leavers Support Service Accommodation Northampton</p>	<p>As of 31.03.2021 there were 730 active external placements</p>	<ul style="list-style-type: none"> Provide care, support and accommodation to Children in Care and Care Leavers.
 <p>Therapeutic support</p>	<p>Please see Therapeutic support/ assessments above</p>		




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6. What We Commission (cont)



Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Support for NCT foster carers**</p>	<p>£661,000</p>	<p>Tbc – new service starting 21/22</p>	<p>Interventions to support foster children aged 5-12 cope with their experiences of trauma and support their foster carers to best care for them</p> <p>Training and support for Social Workers supporting children and carers</p> <p>Sustained placements</p>
 <p>Mental health and wellbeing support for Care Leavers**</p>	<p>Total funding for this project £430,148</p> <p>A small proportion used for commissioned support</p>	<p>Tbc total for project- new service starting 21/22</p>	<p>Provision of mental health support and services to a cohort of 25 Care Leavers – delivered in partnership through Mental Health and Clinical Psychology practitioners; a Project Lead, 2 new Business Support apprentices (Care Leavers), who will focus on housing support and mental health support respectively; the delivery of Emotion Coaching to all frontline PA staff and their managers, ensuring a holistic and supportive culture is encouraged within this service.</p>
 <p>Adoption Support Fund</p>	<p>£228, 327</p>	<p>69 children</p>	<p>Assessment of need, a support plan will be agreed with the family. This will identify the support and or intervention required and what outcomes are being sought.</p>

6. What We Commission (cont)

Children with Disabilities




Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Residential Short breaks</p>	£2,150,000 including contribution from NHS	10 beds available at any time	<ul style="list-style-type: none"> To provide overnight breaks and activities to children and young people who need to receive breaks in a specialist environment To minimise the need for hospital admissions as well as facilitating early discharge from hospital To provide activities that will utilise appropriate venues, equipment and staffing to meet the needs of the children and young people
 <p>Non-residential Short-breaks</p>	£420,000	120 children	<ul style="list-style-type: none"> To provide a service that offers children and young people a multitude of opportunities for growth and development and give an opportunity to socialise with peers, build confidence, resilience and self-esteem, nurture independence, chance to try and learn new challenges and relax and have fun To work with parents to ensure that the service meets their needs including a sufficient break from caring, confidence that their child is well cared for and respond to needs and assurance that their child is undertaking positive and enjoyable activities.
 <p>Sleep Service</p>	£145,000 including contribution from NHS	510	<ul style="list-style-type: none"> To provide family centred sleep advice to identify and address sleep disorders To work directly with parents and carers to ensure that the service suits their family's needs

6. What We Commission (cont)





Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Personal care and support</p>	£1,500,000	135	<ul style="list-style-type: none"> To meet children and young people with disabilities' individual care and support needs in the home and community
 <p>Support for children with visual and hearing impairments</p>	£43,200	<p>Hearing impaired – 650 clients (note: this includes both children and adults)</p> <p>Visual impaired - 166 attendances at children and young people events.</p>	<ul style="list-style-type: none"> To provide prevention services for deaf, deafened deaf-blind and hard of hearing people to prevent the need for more specialist support To provide advice, help and practical support to overcome emotional and practical challenges of living with sight loss.

6. What We Commission (cont)





Enablers

Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Language support service</p>	£112,500	4200 requests	<ul style="list-style-type: none"> To support children young people and families in the care system who speak, communicate or read languages other than English
 <p>Legal support for Independent Reviewing Officers</p>	£6,000	N/A	<ul style="list-style-type: none"> Provides children's and young people's Independent Reviewing Officers with independent specialist legal advice in regards to Care Proceedings and Looked After Children. This ensures that the child's interests are being represented.
 <p>Youth Offending Service case management system</p>	£38,947	N/A	<ul style="list-style-type: none"> Reduced re-offending, reduced risk of harm, improved well-being of young people and their families, effective risk management.


6. What We Commission (cont)

Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Drug and alcohol testing</p>	£100,000	Approx. 100 requests	<ul style="list-style-type: none"> Supports to understand parents substance usage for assessment, support and decision making
 <p>NA testing</p>	£12,000	Approx. 20 requests	<ul style="list-style-type: none"> To understand children's parentage
 <p>Social care case management system</p>	Part of overall contract for children's and adults services	All children and Families with Early Help or Social Care involvement.	<ul style="list-style-type: none"> Supporting practitioners with recording and case managing for families they are working with, allowing for secure data sharing between professionals.
 <p>Social care procedures manual</p>	£9,200	All children and Families with Early Help or Social Care involvement.	<ul style="list-style-type: none"> The workforce has easy access to well written procedures that reflect current legislation, regulations, Statutory Guidance, and best practice. Improved consistency in practice and support offer to children and families.

6. What We Commission (cont)

Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Transport for children and families and for NCT children's homes</p>	£1,667,000	Approx. 300 children and young people in 2020/21	<ul style="list-style-type: none"> • Enable all children who require social care travel assistance to attend school, have contact with family and respite care.
 <p>Cashless payments</p>	£16,000	N/A	<ul style="list-style-type: none"> • To provide an efficient and low risk payment system to children, young people and families without relying on petty cash payments
 <p>Family Time booking system</p>	£30,000	N/A	<ul style="list-style-type: none"> • To provide efficient and effective appointment booking system, reducing administration
 <p>Equipment for children in the community</p>	£116,000	Varies	<ul style="list-style-type: none"> • Providing equipment, minor adaptations, and repairs for children with disabilities and their families to promote their independence and equal opportunities.

6. What We Commission (cont)

Commission	Annual Spend 2019/20 or Annual Contract Value 2020/21	Approximate number of children/ young people/ families supported	What outcomes and activities is this commissioned to achieve?
 <p>Software to support children's participation</p>	<p>£60,000 3 years</p>	<p>Available for all children supported by NCT</p>	<ul style="list-style-type: none"> • Increased engagement of children and young people • Increased influence of children and young people in developing and improving support • Reduced administration time • Earlier reporting of concerns by children to address any issues at earlier stage

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*Our Sufficiency Strategy informs the commissioning of placements for children in care and care leavers

**Funded by Public Health to achieve public health outcomes

***Funded by Better Care Fund

7. Our Commissioning Plans

The following sets out our plans for 2021/22 and 2022/23. Our plans for 2023/24 are dependent on the outcome of the activity in the first two years of this strategy.

Our contracts register and commissioning forward plan detail the timeline for the understand, plan, do and review stages for each of these commissioning projects, and will be overseen by our Commissioning Board. The Commissioning Board reports to the Trust Senior Leadership Team and Trust Board, making recommendations for in relation to procuring services, awarding contracts and decommissioning. The Board has oversight of all our commissioning activity (including joint commissioning), the commissioning forward plan and the quality and outcomes of commissioned services.

2021/22

We will be working with commissioned providers to ensure we are working collaboratively for families and to monitor the impact of services.

We will work with partners to develop the Integrated Care System for children and young people, including joint commissioning.

We will undertake the following commissioning projects (this includes where current contracts are due to end or be extended this year or next year):

Family Support Services & Youth Justice

- Targeted employment, education and training support
- Support for young carers

Children In Need Of Help & Protection

- Family Group Conference Service
- Drug and alcohol and DNA testing

Children In Care, Care Leavers & Adopted Children

- NCT Fostering Family interventions
- Sufficiency Strategy Action Plan – re-open fostering, children’s homes and independent supported accommodation frameworks and training flats for care leavers; consider options for managed support service accommodation and emergency placements

Children With Disabilities

- Support for children with disabilities and their families

Enablers

- Language support

7. Our Commissioning Plans (cont)

2022/23 and beyond

We will be working with commissioned providers to ensure we are working collaboratively for families and to monitor the impact of services.

We will work with partners to develop the Integrated Care System for children and young people, including joint commissioning'.

We will undertake the following commissioning projects (this includes where current contracts are due to end or be extended this year or next year):

Family Support Services & Youth Justice

- Targeted safeguarding support
- Targeted Support for children under 5 and their families in Corby
- Appropriate Adult Service
- Mentoring for adolescents

Children In Care, Care Leavers & Adopted Children

- Sufficiency Strategy Action Plan – residential care, fostering and independent supported accommodation framework, residential block contract
- Fostering Family Support
- Support for Care Leavers' Mental Health and Wellbeing

Children With Disabilities

- Personal Care and Support framework

- Support for children with disabilities and their families

Enablers

- Legal advice for Independent Reviewing Officers

8. Measuring The Impact Of Our Commissioning Strategy And Framework

To understand the overall impact of our Commissioning Strategy and Framework, it is essential that we understand the difference each of our commissioned services has made. Performance monitoring is agreed with providers for each commissioned service, based on the outcomes and activity agreed in the service specification, and includes a variety of methods to understand activity and impact including quantitative and qualitative data on activity and outcomes, views of children, young people and families, views of practitioners and views of regulators where applicable. Performance monitoring is completed on a quarterly basis and impact reported annually.

All of our performance monitoring aims to answer the four Outcomes Based Accountability (Friedman) questions:

	Quantity	Quality
Effort	How much did we do?	How well did we do it?
Effect	Is anyone better off – what difference did we make to the lives of children and their outcomes? Where do we need to focus our improvement efforts?	

Here is some feedback from parents/ carers and our staff about our commissioned services:

“I have been supported massively by the Family Support Worker. The Family Support Worker has been amazing and supported us through a difficult time. She gave me practical and effective approaches to implementing routines and managing behaviours” (parent/carer)

“The Learning Mentor at the school has shared that child has seemed more settled in school and his behaviour has improved the past few weeks” (school)

“Thank you MST from the bottom of our hearts for helping our family re-think our communication and the way we approach behaviours” (parent/carer)

“You helped me behave better, mum has stopped getting phone calls from school every day because I behave more. The worksheets and bits you gave me on managing my emotions and anger really helped. It was good being able to talk with you. The family rules chart you introduced really help my younger brothers.” (young person)

8. Measuring The Impact Of Our Commissioning Strategy And Framework (cont)

“Family has been supported with relationship and positive discipline and routines for children, they had parenting support and emotional support, and parents reported they appreciated Family Intervention Project’s support” (social worker)

“I feel that without the care offered by short breaks, the young person would have been admitted to a hospital where behaviours would have intensified. In accessing a familiar, safe environment the young person has been able to be supported through this difficult period with positive results for both them and their family” (provider)

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We will know we have achieved the objectives of this **strategy** when all of our commissioning is:

- Led by the voice of children, young people, families and practitioners
- Completed within good time to allow for each stage of the cycle to be undertaken effectively (in accordance with the size or nature of the commission)
- Achieving demonstrable impact and positive experiences for children, young people and families (or our staff in the case of ‘enabler’ goods and services); and best value for money
- Enabling us to achieve the objectives of our Business Plan





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Children's Trust

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Children in Care Profile and Forecasts to March 2024

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End March 2023 data source, created 13/4/23, version 1



Northamptonshire
Children's Trust

Appendix G

Key Points

- From **1124** CiC at end March 23 (excluding UASC), an increase to **1132** is forecast for March 2024, with lower confidence limit of **1104** and upper **1160**.
- The projected increase is largely due to the younger age groups which are forecast to increase by 2%
- The UASC total is at **104** currently, with the 0.1% threshold level for UASC being 173 for the county, so there is the potential to gain another 69 UASC before that threshold is reached.

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The majority of UASC in 2022/23 are in supported accommodation placements (78%) and 20% in foster placements so it's worth noting that they will add to the demand for those placement types.

- The forecasts in this presentation use a **1 year data trend**, assume no other actions are taken to reduce the care population and all exclude UASC (see "tool accuracy" slides for notes on forecasting with or without UASC)
- When forecasting the March 2023 figures using 2022 data, the total forecast non-UASC care figure was relatively close to the actual (1130 projected v 1124 actual). The harder to forecast elements of how the ages and placement types would be split varied in success, with aged 16+ projected to be much lower than actual and 10-15's predicted to be higher than they were.



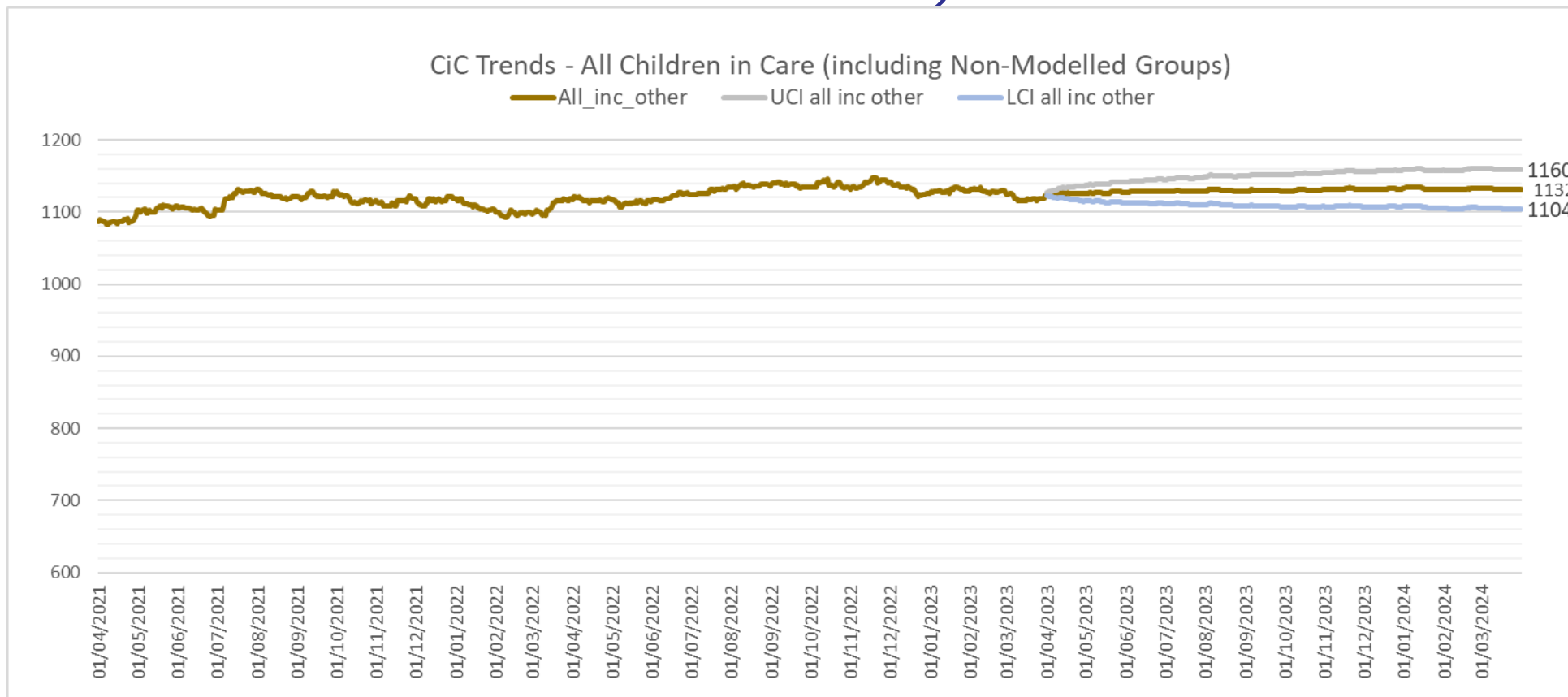
Summary Figures – Excluding UASC

Exc UASC	Total inc Unmodelled	total (Fos, Res, Supp)	Fos	Res	Supp	Age 0	Age 1_4	Age 5_9	Age 10_15	Age 16_18
Actual 31/03/2022	1118	995	823	134	38	57	114	207	436	181
Actual 31/3/2023	1124	996	799	137	60	45	124	205	398	224
Base Forecast 31/03/2024	1132	1004	795	141	68	41	135	201	382	245
Base LCI	1104	976	771	131	59	32	124	190	367	231
Base UCI	1160	1032	819	151	77	50	146	212	397	259
% Change from current to 31/03/24	0.7%	0.8%	-0.5%	2.9%	13.3%	-8.9%	8.9%	-2.0%	-4.0%	9.4%

Projections by age include only the modelled groups. The 'All-Total' include all children in care.



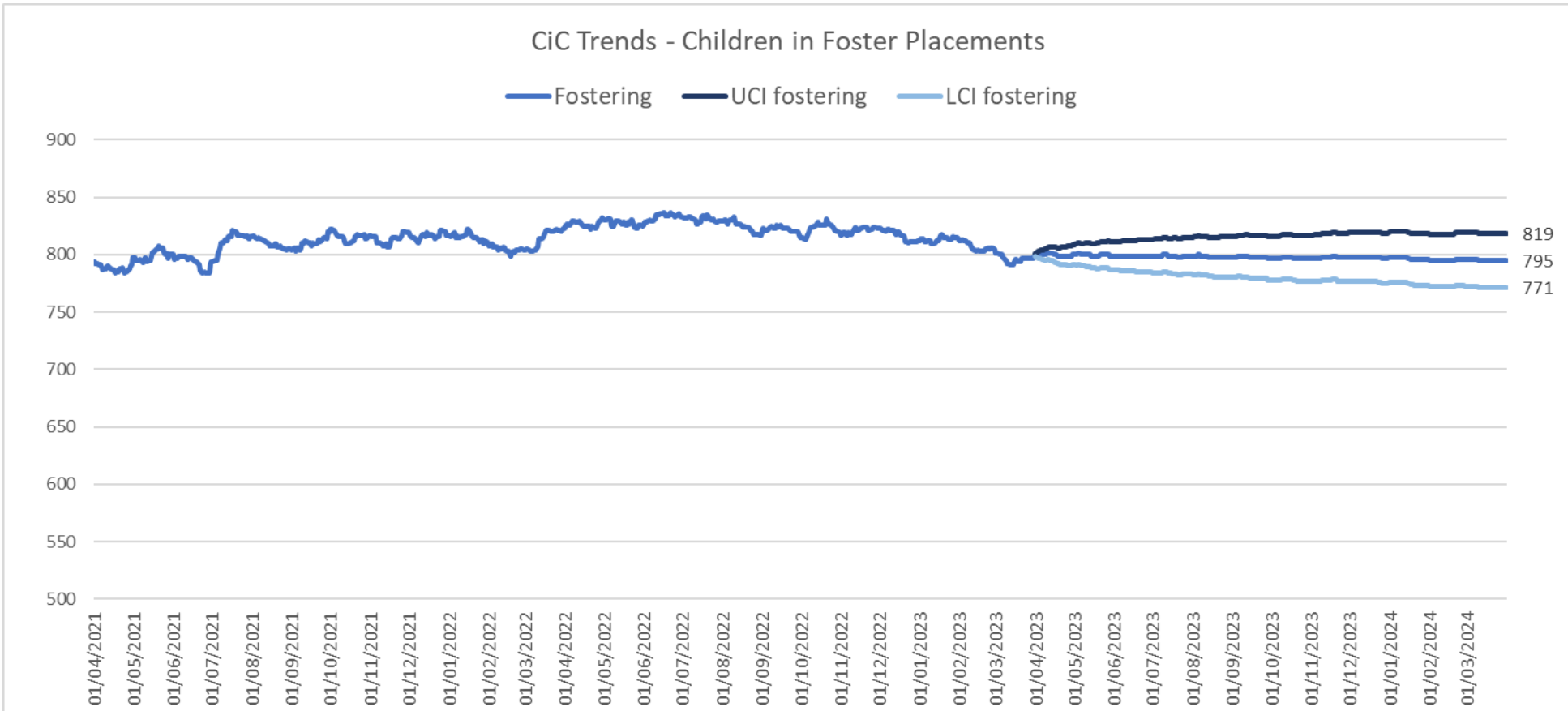
Trend- All Children in Care, Exc UASC



The care population (excluding UASC) has increased **1%** from **1118** at the end of March 2022 to **1124** at the end of March 2023. An increase of **1%** up to **1132** is forecast to March 2024.



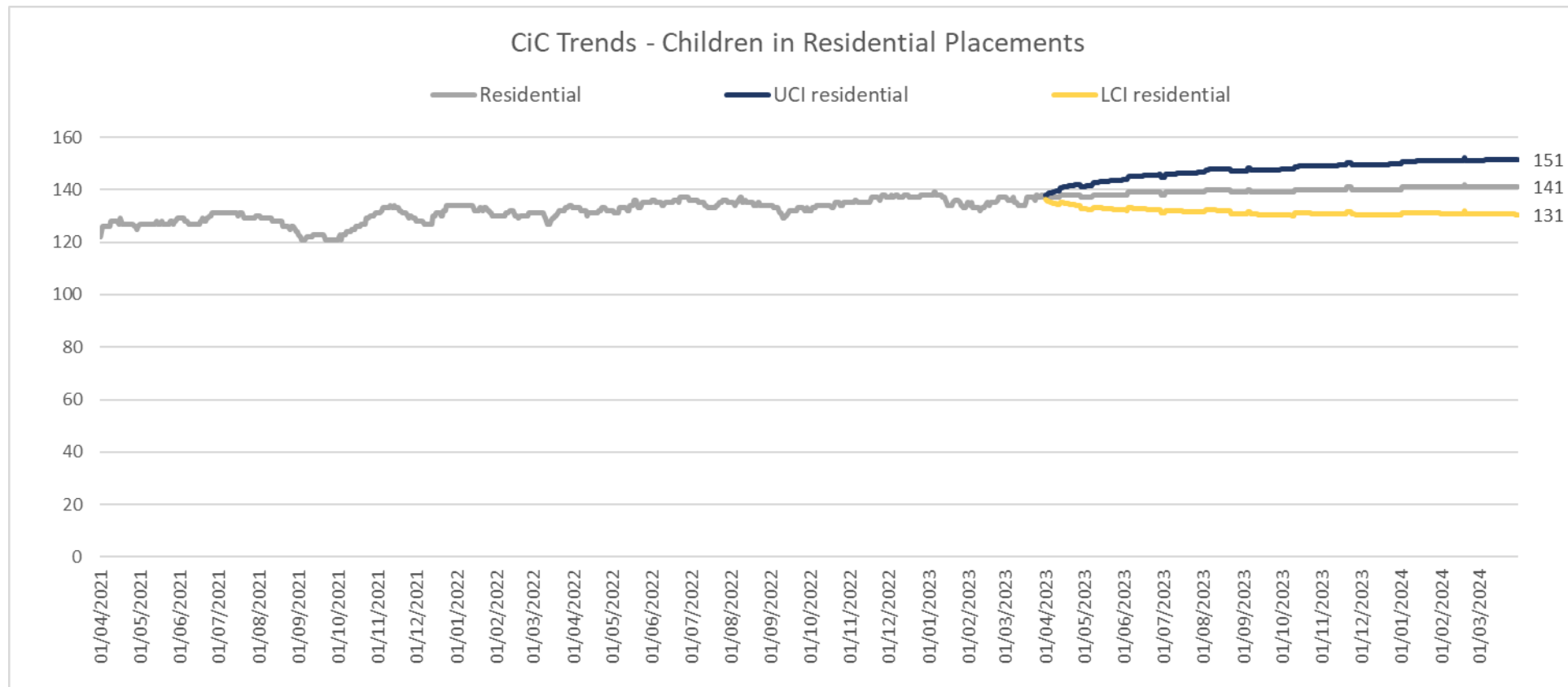
Foster Placements



Foster placements (which includes placements with a connected person) decreased **3%** from **823** children in March 2022, to **799** March 2023. A **0.5%** decrease to **795** is forecast at the end of March 2024.



Residential Placements

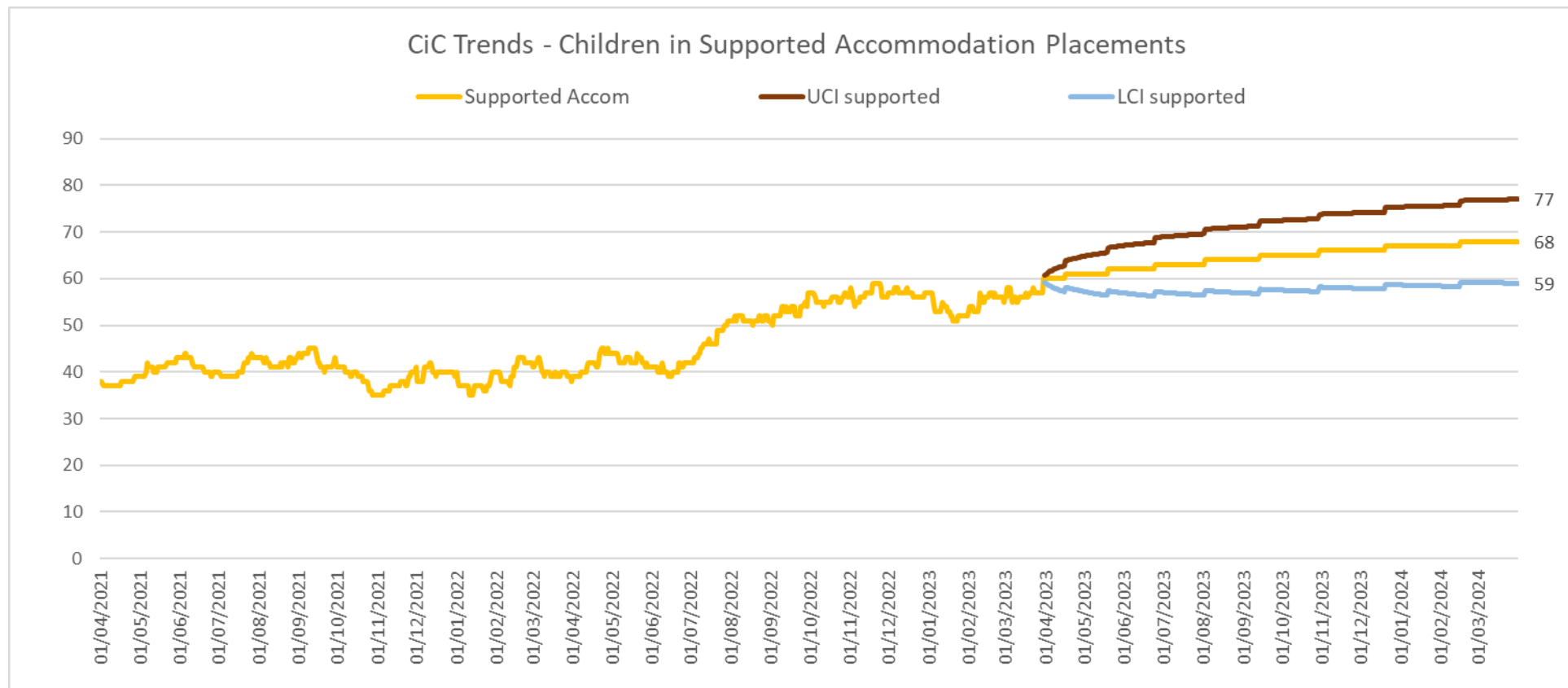


Residential placements was at **134** children at end March 23, and remained relatively consistent at **137** end March 23. This is forecast to increase by 3% at the end of March 2024, to **141**.



Supported Accommodation Placements

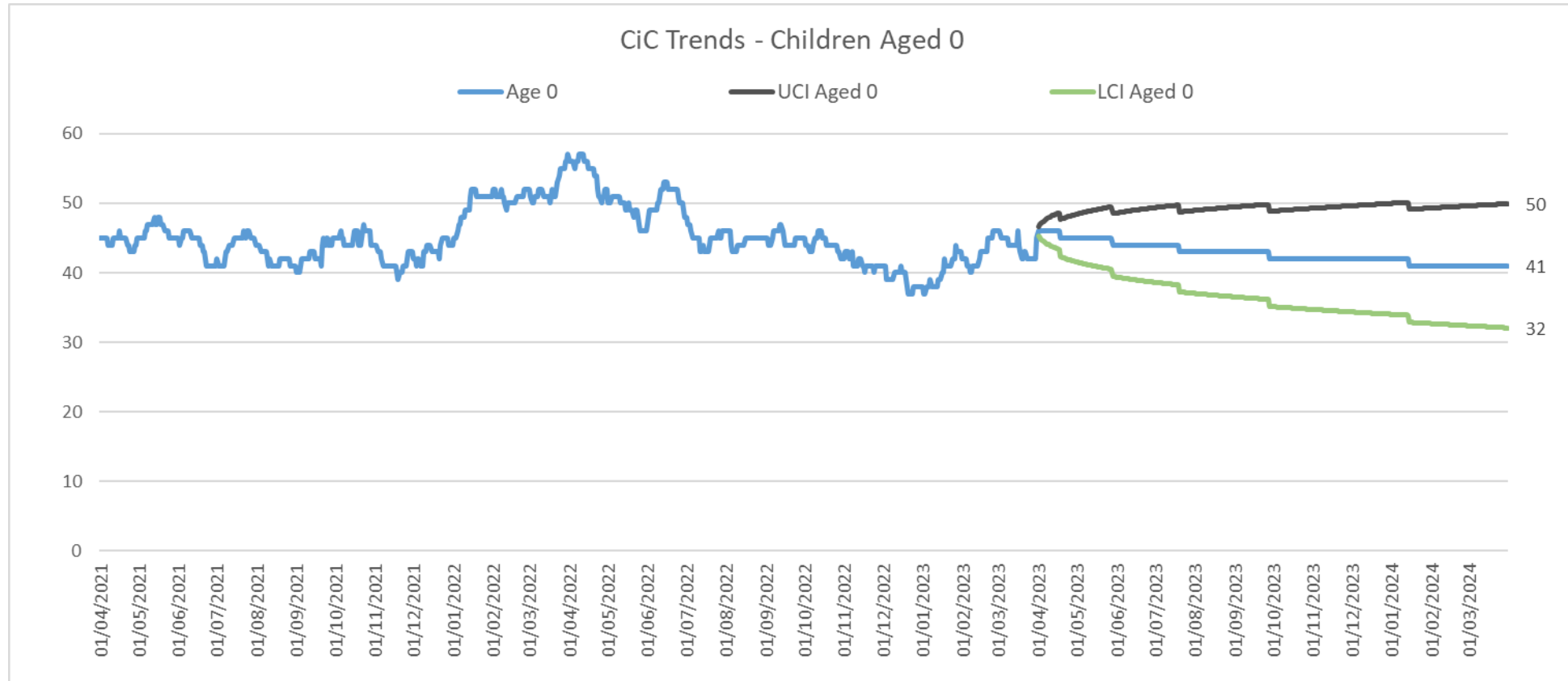
CiC Trends - Children in Supported Accommodation Placements



Supported Accommodation placements increased **58%** from **38** children in March 22, to **60** in March 23. A 13% increase to **68** is forecast at the end of March 2024.



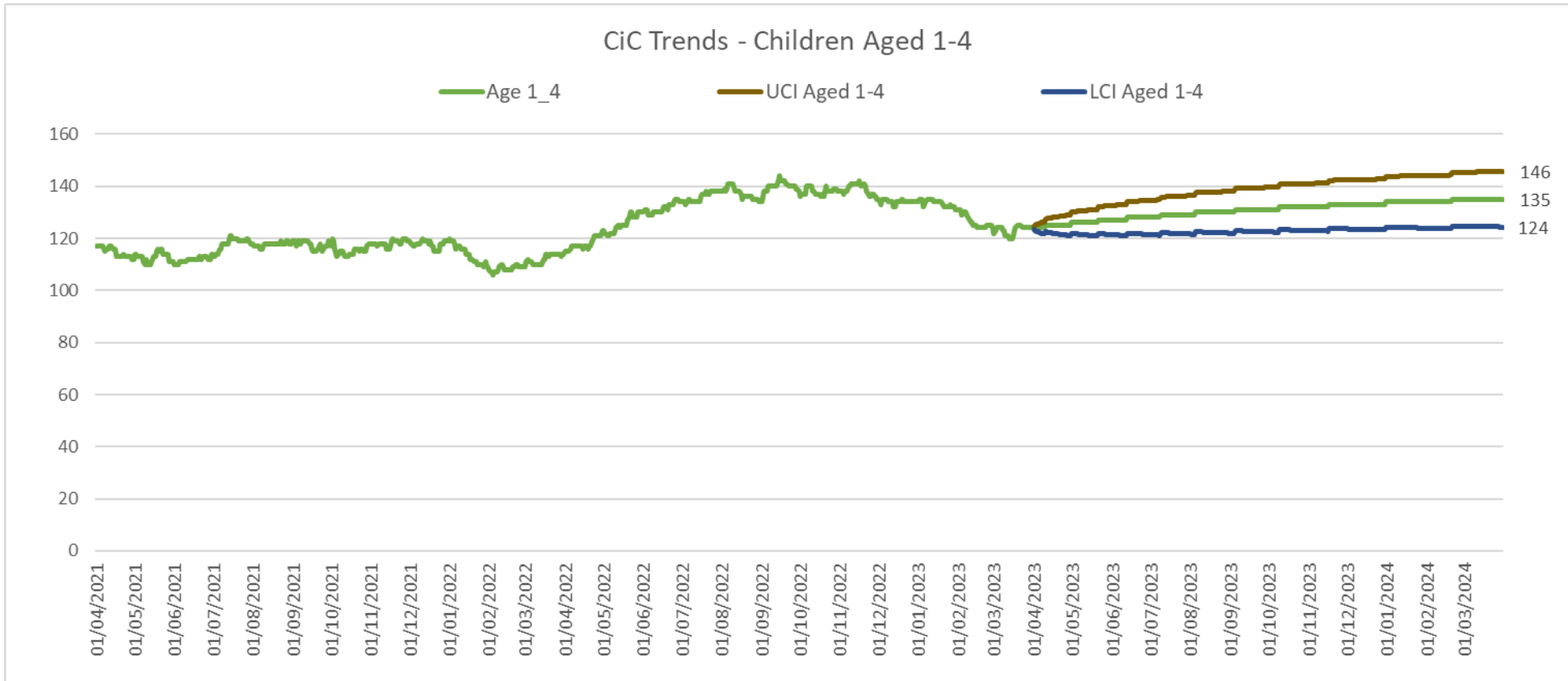
Age Under 1



Children in care aged under 1 has decreased **21%** from **57** in March 22 to **45** in March 23. A 9% decrease is forecast to **41** by March 2024.



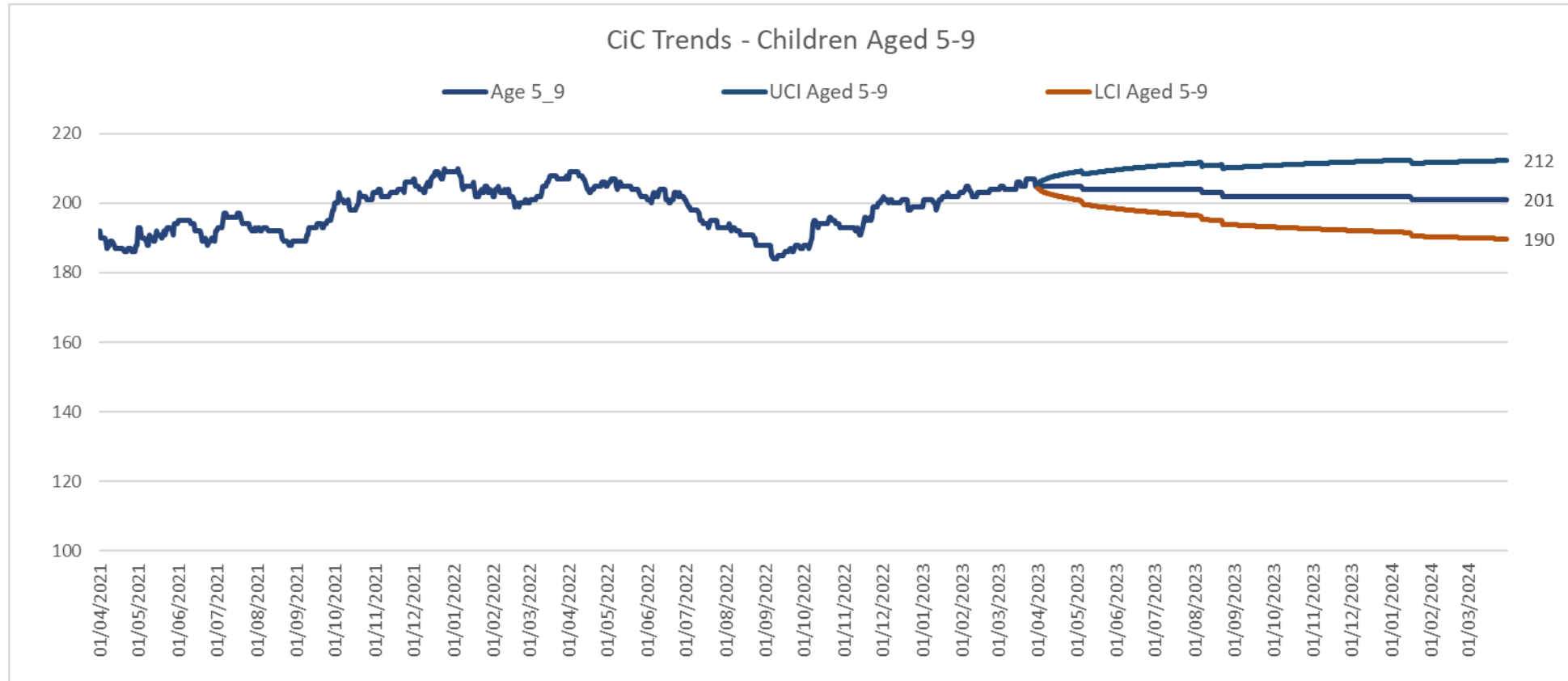
Age 1-4



Children in care aged 1-4 has increased **9%** from **114** on 31/3/22 to **124** on 31/3/23. An increase of **9%** is forecast to **135** by March 2024.



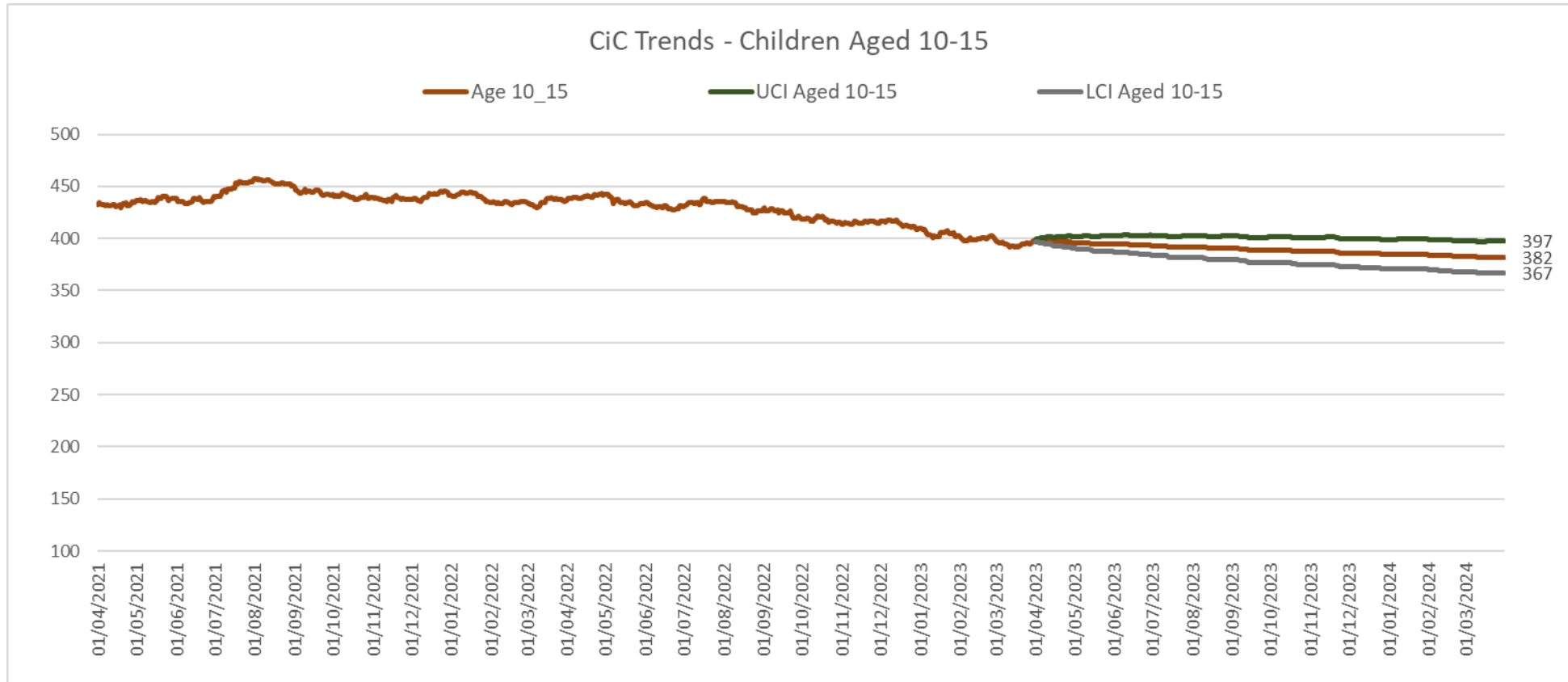
Age 5-9



Children in care aged 5-9 has decreased **1%** from **207** on 31/3/22 to **205** on 31/3/23. There is a **2%** decrease forecast to **201** by March 2024.



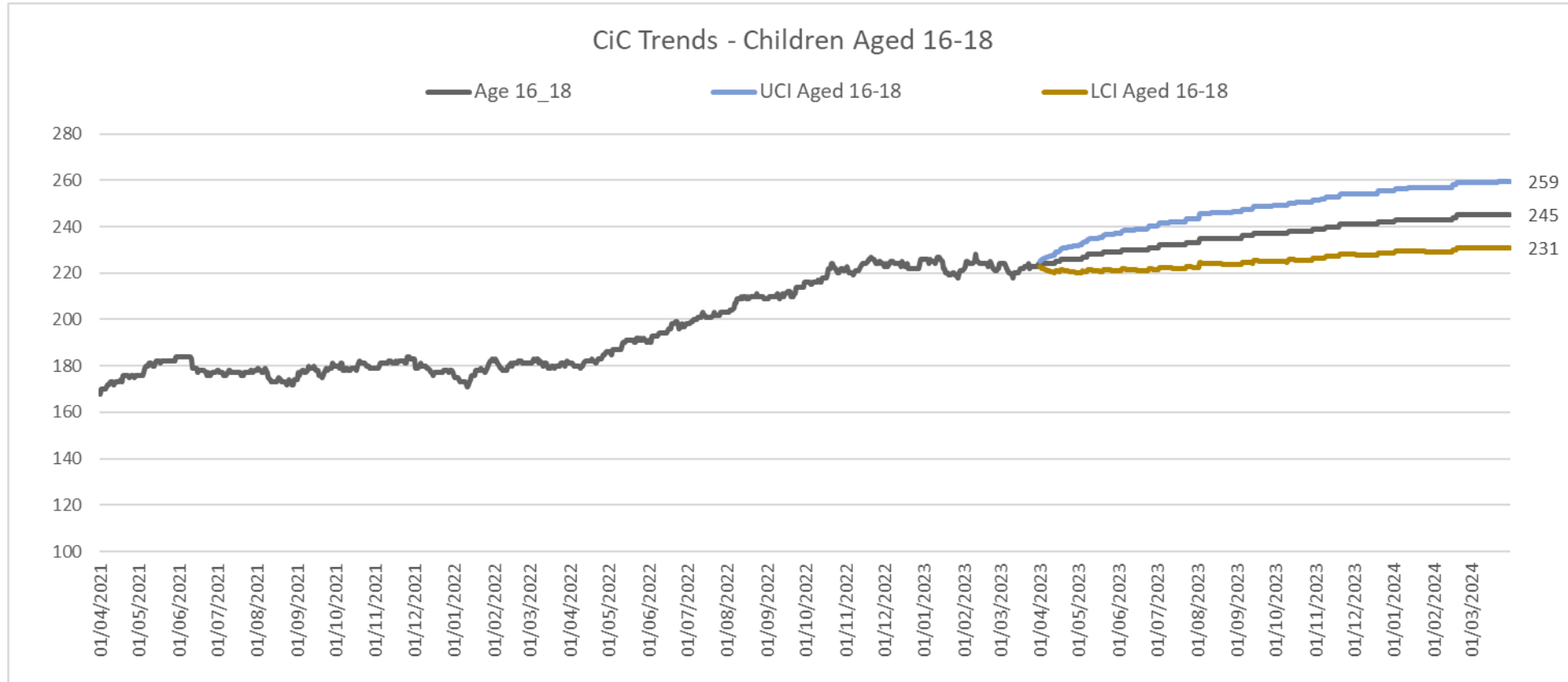
Age 10-15



Children in care aged 10-15 has decreased **11%** from **436** on 31/3/22 to **398** on 31/3/23. There is a 4% decrease forecast to **382** by March 2024.



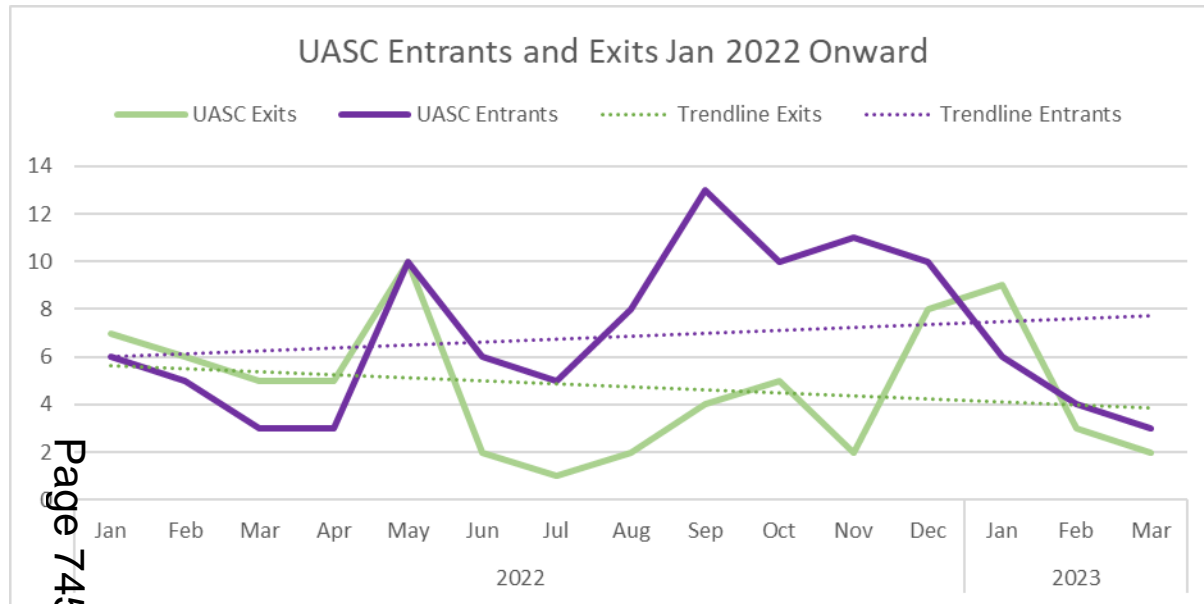
Age 16-18



Children in care aged 16-18 has increased **24%** from **181** on 31/3/22 to **224** on 31/3/23 with a 9% increase forecast to **245** by March 2024.



UASC exits/entrants



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2022/23	UASC Entrants	UASC Exits	Net change
Apr	3	5	-2
May	10	10	0
Jun	6	2	4
Jul	5	1	4
Aug	8	2	6
Sep	13	4	9
Oct	10	5	5
Nov	11	2	9
Dec	10	8	2
Jan 23	6	9	-3
Feb	4	3	1
Mar	3	2	1
Total	89	53	36

UASC entering care since Jan 2022 year up until May 2022 kept a relatively even pace to those exiting care, with 27 entering and 33 exiting, but from June, entrants were significantly higher than those leaving. The last 3 months have seen the UASC numbers stabilise again.



**Northamptonshire
Children's Trust**

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RAG Criteria	
Red	Major issues identified which may prevent delivered as expected
Amber	Issues identified which may delay the progress and require action but do not threaten overall delivery
Green	On track to deliver as expected
Completed	Successfully completed
Not Started	Not yet started

Partnership improvement priorities are shown in orange

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
1. Excellent Leadership							
Children's experiences and outcomes are improved as a result of consistently good quality management oversight and supervision	1.1 Consistently strong management oversight and supervision Improve the consistency of quality and timeliness of recorded management oversight and reflective case supervision across front line services; which includes trajectory planning, and evidences safety, progress and impact for children	AD Corporate Parenting AD Safeguarding AD CFSS & YOS	Mar 24	NCT Service Plans QAB action log	QA activity shows improved scaling for management oversight and outcomes for children <i>Baseline 68% CRPDs scaled 6 and above out of 10 management oversight; 79% scaled 6 and above out of 10 outcomes</i> Timeliness of supervision <i>Baseline 48%</i>		
	1.2 Impactful quality assurance of management oversight and supervision <ul style="list-style-type: none"> Focus on quality and impact of management oversight and supervision throughout QA programme Improve robustness of senior management oversight of children in unregistered placements 	AD QA & Commissioning AD Corporate Parenting AD Safeguarding AD CFSS & YOS	Mar 24	NCT Service Plans QAB action log	Increase number of NCT operational managers consistently completing QA activity QA moderation shows improvement in quality of QA activity Senior management oversight of unregistered homes evidenced on child's records		
	1.3 Effective recognition and response to current and emerging national pressures	NCT/ WNC/ NNC Operational Commissioning Group	Mar 24	OCG action log	Children achieve positive outcomes Social workers have manageable caseloads		
Sufficient resources are allocated and							

NCT IMPROVEMENT PLAN

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
managed to enable effective delivery of NCT services	(i.e - increased complexity of need and increased demand on statutory services – Valuing Care - ability of fostering and children’s homes market to meet needs - Social care workforce shortages - Increased costs (ie staff, transport, homes for children)						
2 Recruit, retain and develop an awesome workforce							
Children are supported by consistent practitioners who have the capacity and skills to develop effective relationships and undertake good quality work with them	2.1 Increased opportunities into social work posts <ul style="list-style-type: none"> Step Up, Frontline, NQSWs, SW Apprentices, Social workers recruited from abroad 	Director of Finance & Resources AD Quality Assurance & Commissioning	Mar 24	NCT Workforce Strategy	Reduced SW vacancies Baseline 17.1%		
	2.2 Excellent CPD offer and conditions of success <ul style="list-style-type: none"> Ensure the effectiveness and capacity of support services and business support to enable frontline practitioners and managers to focus on practice Progress new case management system to meet practice needs Refresh the practice model. Fully embed Signs of Safety and implement systemic practice 	AD Quality Assurance & Commissioning	Apr 23 – Mar 24	NCT Workforce Strategy	QA activity shows improved scaling for outcomes for children <i>Baseline 79% CRPDs scaled 6 and above out of 10 outcomes</i> Training take up and feedback Reduced turnover rate Baseline 17.1% Practitioners report work is manageable and they are well supported (annual social work health check)		
Children and families receive an appropriate response in an emergency out of hours	2.3 Complete disaggregation of EDT and ensure appropriate capacity	NNC/ WNC DCS Director of Finance & Resources AD Safeguarding	Sept 23	OCG action log	EDT will deliver services for children only		

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
3 Strong Relationship based practice							
<p>Children and families receive the right specialist and timely response that meets their needs and improves their outcomes</p>	<p>3.1 Strong assessment of need and appropriate response</p> <ul style="list-style-type: none"> Implement systemic practice and Valuing Care assessment alongside embedding of Signs of Safety Ensure effective practice in transfer of cases from MASH to DAAT to increase timeliness of response for families Ensure good quality direct work is used to inform assessment and plans for all children, including through increased use of Mind of My Own app Efficient processes and sufficient resource in place to ensure children and young people in care, including those living out of county, receive timely initial and review health assessments. Continued dialogue with region and national NHS leaders regarding the revision of statutory guidance of initial health assessments 	<p>AD Safeguarding AD Corporate Parenting AD CFSS & YOS AD QA & Commissioning</p> <p>ICB Head of Safeguarding/Designated Nurses NHFT AD C&YP</p>	<p>Mar 24</p>	<p>NCT Service Plans</p> <p>CYP Transformation Programme</p>	<p>Appropriate and timely screening, decisions with robust rationale and transfer evidenced via performance data and QA activity (including multi agency practice review).</p> <p>Reduce re-referrals (baseline 29%) Reduce assessments with NFA (baseline 38%)</p> <p>CRPDs scaled 6+ out of 10 for voice of child, identity and culture (baseline 73%)</p> <p>CRPDs scaled 6+ for outcome for children (baseline 79%)</p> <p>Increase in percentage of children who receive IHA and RHA within statutory timeframes IHAs baseline 83.7% RHAs baseline 73.8%</p> <p>QA activity evidences good quality initial and review health assessments.</p>		

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
Children are well cared for in a permanent and safe home at the earliest opportunity	<p>3.2 High quality effective permanency planning at earliest opportunity</p> <ul style="list-style-type: none"> Improve effectiveness of planning for children to come into care, including appropriate use of Police Powers and joint planning Effective Family network meetings occur in every case where there are concerns about safety and welfare of a child Clear trajectory and contingency planning Good quality life story work with all children in care throughout their time of being looked after All children in care have effective SMART permanence plans which consider all options for permanency 	AD Safeguarding AD Corporate Parenting Ivan Balhatchet – Crime & Justice NPCC Lead		NCT Service Plans LFJB Action Plan	<p>Reduction of emergency admissions to care</p> <p>Increased use of PLO</p> <p>QA activity evidences effective joint planning and families are clear why we are involved and the changes they will be supported to make</p> <p>Families are supported to achieve and sustain change and more children remain in or return to their family's care (Baseline children in care rate 71 Baseline children in care returning home tbc Baseline children leaving care due to permanence 20%)</p>		
Care leavers have access to support that meets their needs and improves their outcomes	<p>3.3 Appropriate out of hours and crisis support for care leavers</p> <ul style="list-style-type: none"> Review and develop multi-agency local offer for care leavers including provision of an out of hours service and access to crisis support Explore opportunities to develop a hub for care leavers living in North Northamptonshire 	AD Corporate Parenting NHFT AD CYP WNC & NNC Adults Services & Housing ADs ICB Senior Transformation Manager	Mar 24	Corporate Parenting Board	QA activity and feedback from young people shows access and impact		
4 Insightful quality assurance and learning							
Children's outcomes and experiences are improved as a result of improving practice	<p>4.1 Consistently impactful IRO and CP Chair escalations</p>	AD Quality Assurance & Commissioning AD Safeguarding AD Corporate Parenting	Sept 23	NCT Service Plans	<p>Timely responses to escalations</p> <p>QA activity to evidence impact of escalations</p>		
	<p>4.2 Learning from QA activity makes a difference for children</p> <ul style="list-style-type: none"> Actions and learning from individual CRPDs are progressed through 	Director of Social Care All ADs	Mar 24	QAB action log	QA activity to evidence impact		

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
	supervision and evidence on child files of progress made <ul style="list-style-type: none"> Thematic learning from QA activity is shared through training and communications and impact is measured and demonstrated 						
	4.3 Impactful multi agency quality assurance <ul style="list-style-type: none"> 3x multi agency practice reviews (MAPRs) per year; thematic learning shared through NSCP Implement a process to enable review, learning and improvement of young people detained in police custody 	NSCP Quality and Governance sub group chair Ivan Balhatchet – Crime & Justice NPCC Lead Director of Social Care	Mar 24	NSCP business plan	Impact on practice and outcomes as a result of QA activity QA evidence that needs of children in police custody are closely monitored to ensure decision making conforms to current statutory guidance; good practice shared		
5 Healthy Partnerships that improve outcomes for children							
Risks for children who are experiencing contextual vulnerabilities are effectively managed and the impact on them is minimised	5.1 Improve our partnership response for children who are experiencing contextual vulnerabilities <ul style="list-style-type: none"> Improve our partnership response to domestic abuse Improve our partnership response to exploitation Improve quality and impact of our response (including return home interviews) to children who go missing. 	Director of Social Care AD for CFSS WNC and NNC Community safety ADs Director of Social Care AD Safeguarding AD CFSS Ivan Balhatchet – Crime & Justice NPCC Lead ICB Head of Safeguarding/Designated Nurses representing health as a system	Timescales as per partnership action plans	Domestic abuse strategy West Northamptonshire Council (westnorthants.gov.uk) Domestic abuse strategy North Northamptonshire Council (northnorthants.gov.uk) NSCP exploitation strategy and action plan	Impact on child reduces evidenced by QA activity; supervision and MO. Timely access to DA services including for perpetrators Reduction of children coming into care due to exploitation Reduction in the numbers of children who go missing; and numbers who go repeatedly missing. Children in care have fewer missing episodes. Timely decision making in neglect cases evidenced by QA activity and reduced repeat CP plans for neglect		

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
	<ul style="list-style-type: none"> Improve our partnership response to neglect Skilled workforce able to identify neglect factors; Increased use of GPC 2 tool 	<p>WNC and NNC Public Health children's leads</p> <p>NSCP Neglect Sub Group Chair</p> <p>NSCP Strategic Leads</p>		<p>NSCP Neglect Strategy and action plan</p> <p>NCT Service Plans</p>			
<p>Children and families in need of additional help receive the right support at the right time which makes a difference to their lives</p>	<p>5.2 Further strengthen the partnership Early Help offer</p>	<p>Director of Social Care AD CFSS & YOS</p> <p>ICB Head of Safeguarding/Designated Nurses representing health as a system</p> <p>WNC/ NNC ADs for Public Health Commissioning</p>	<p>Timescales as per NSCP Early Help action plan</p>	<p>Early Help Partnership Strategy and action plan</p> <p>CFSS Service Plan</p>	<p>Increased EHA submissions from schools, GPs and Health Visitors</p> <p>Better outcomes for children evidenced in more families receiving help early from a range of professionals</p>		
<p>Children with additional and complex needs receive the right support at the right time which makes a difference to their lives</p>	<p>5.3 Appropriate and timely support for children with additional and complex needs</p> <ul style="list-style-type: none"> Implement short breaks redesign Children with disabilities receive suitable education commensurate with their needs Local offer to meet the needs of children Every disabled child aged 14+ has a transition plan developed with their family Children have good quality EHCP informed by thorough assessments of need which are reviewed on an annual basis Appropriate treatment and support response for children who are addicted to substances 	<p>NCT AD QA & Commissioning; ICB Senior Transformation Manager</p> <p>WNC/ NNC ADs Commissioning</p> <p>AD Corporate Parenting</p> <p>WNC and NNC ADs Adults Social Care</p> <p>WNC and NNC ADs Education</p> <p>Director of Social Care AD QA and Commissioning</p>	<p>Mar 24</p> <p>Sept 23</p>	<p>West and North SEND Strategies and action plans</p> <p>CYP Transformation Programme</p> <p>CYP transformation programme</p>	<p>Reduction in the number of children with disabilities who become looked after and/or require acute care</p> <p>EHCP and EHC reviews shared in a timely manner with child/ families and considered by professionals involved with the child</p> <p>Pathway for accessing substance misuse, emotional well-being and mental health support is understood by all</p> <p>Swift access to appropriate support for children and support plan developed with family, network and professionals</p> <p>Multi agency QA activity (via NSCP Q&G subgroup) shows multi agency case discussions are used appropriately and have positive impact</p>		

NCT IMPROVEMENT PLAN

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
	<ul style="list-style-type: none"> Appropriate support and response for children who are exhibiting self injurious behaviour, suicide ideation, disordered eating, gender dysphoria Improve the consistency and quality of multi-agency decision making and ownership for children with complex needs to achieve positive outcomes for children 	<p>ICB Senior Transformation Manager WNC/ NNC AD Public Health Commissioning CYP Transformation Board Healthy Minds Healthy Brains pillar chair</p> <p>AD Corporate Parenting AD Safeguarding ICB Head of Safeguarding/Designated Nurses Ivan Balhatchet – Crime & Justice NPCC Lead</p>		NCT Service Plans			
Children in care and care leavers reach their potential in terms of educational attainment	<p>5.4 Increase access and attendance of small number of children in care currently not in appropriate education</p> <ul style="list-style-type: none"> Increase sufficiency and quality of in county special school and alternative educational provision Care/Education pathway to be developed for children entering care and when moving placement to ensure that education needs are considered in timely way, prior to and immediately after children become looked after and moving placements Develop range of education, training and employment opportunities for post 16 children in care with additional needs, and care leavers Assessments for specific needs e.g. ASD/ADHD and SEND needs assessments are available to children in care and undertaken in a timely way 	<p>Director of Social Care AD Corporate Parenting</p> <p>NNC & WNC ADs for Education & for Commissioning</p> <p>Head of Virtual School</p> <p>ICB Senior Transformation Manager</p>	Sept 23	<p>Children in Care Strategy</p> <p>NCT Service Plans</p>	<p>Reduce length time in which any child in care is not in receipt of appropriate education</p> <p>Maintain at national average % of young people in care achieving 5 GCSE grade A*-C</p> <p>Maintain above national average care leavers who are EET</p> <p>Increase in numbers of apprenticeships, traineeships and employment opportunities for care leavers within NCT, NNC, WNC and partner agencies</p>		

6. Effective use of resources

NCT IMPROVEMENT PLAN

What will good look like	Improvement Priorities	Responsibility	By when	Linked plans	How will we know if we've made a difference? <i>Baselines Jan 23</i>	RAG	Progress Update
NCT commissioning and performance management has the best possible impact on outcomes for children	6.1 External review of commissioning and QA, performance management and assurance arrangements	NCT Chief Exec	May 23	QAB action log	Positive outcomes and value for money achieved		
Children in care are cared for in a home which meets their needs and improves their outcomes	6.2 Deliver sufficiency strategy action plan ensuring we have the right homes to meet the needs of our children and young people <ul style="list-style-type: none"> Children and young people who live within residential care are provided with homes that are registered with a regulator appropriate for their needs Ensure cost of care is met appropriately Our ISA providers are registered with Ofsted (post 1st April 2023) 	Director of Social Care AD Quality Assurance & Commissioning AD Corporate Parenting NNC/WNC DCS NCT CEX	Aug 25 (project timescales in sufficiency strategy action plan)	Sufficiency Strategy and action plan	Increase in number of in house foster placements Increase in occupancy of in house residential homes Reduction in use of unregistered provision Improved placement stability <i>baseline 3+ moves in 12 months: 11%</i> <i>baseline same placement 2+ years / placed for adoption: 64.1%</i> Placement funding contributions are in line with other areas		
Older teenagers receive the right support and accommodation to meet their needs and help transition into adulthood	6.3 Appropriate range of accommodation and support is available and meet the needs of young people 16-25 years old <ul style="list-style-type: none"> Work in partnership with Housing Needs to support accommodation requirements of 16/17 Youth Homelessness Views of young people who have experienced the Housing protocol to inform further developments and plans Housing support offer for care leavers 18+ and ensure any gaps in provision have actions to address 	NNC/WNC DCSs Director of Social Care WNC and NNC Housing ADs AD CFSS & YOS AD Corporate Parenting AD QA& Commissioning	September 23	16-17 homeless action plan NCT Service Plans	QA activity shows Care leavers are able to move into their own suitable accommodation at time that meets their needs 16-17 homeless young people receive an appropriate and timely response in accordance with their needs and views		



Northamptonshire Children's Trust

Self-Evaluation September 2022

Progress since Northamptonshire ILACS 2019

Our Vision:

“Children, young people and families at the heart of all we do - in every decision we make and every action we take”

Our Values:

- ❖ Be child focused and work with the whole family.
- ❖ Make a difference with trust and integrity.
- ❖ Concentrate on the best solution.
- ❖ Act with respect, kindness, and compassion.
- ❖ Communicate well.
- ❖ Do the best job of your life every single day.

Our Commitment to children and young people:

“What we do today affects your tomorrow. We promise to walk side by side with you”

Our Ambition:

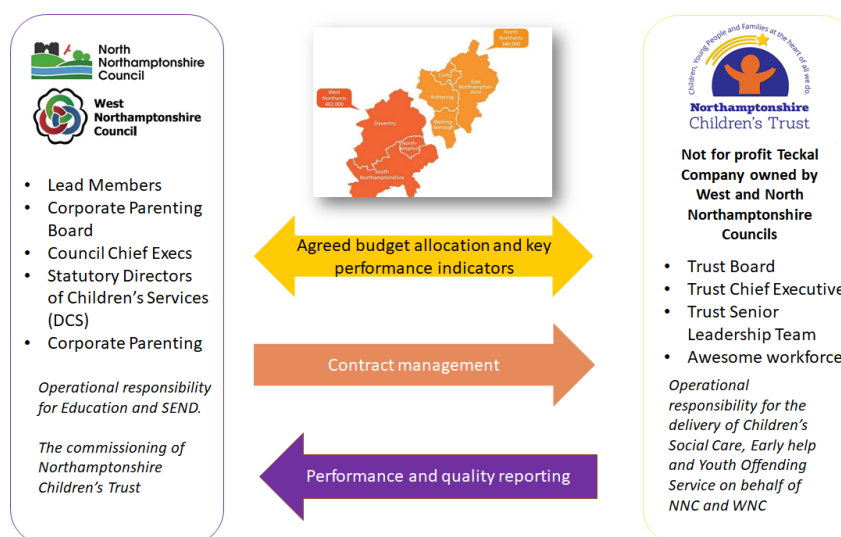
“Our ambition is to make a sustainable improvement to the lives of children, young people and families”

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• Children in Care	
• Care Leavers	

Section 1 – Introduction

Northamptonshire Children’s Trust (NCT) delivers Children’s Early Help, Social Care and Youth Offending Services to West Northamptonshire (WNC) and North Northamptonshire (NNC) councils, serving the whole of Northamptonshire County since November 2020. In April 2021 Northamptonshire County Council was replaced by two unitary councils, WNC and NNC, each with a Lead Member for Children’s Services. The DCS was initially a joint post until summer 2022.



Since our 2019 ILACS we have had the following Ofsted monitoring visits, which document how we are improving experiences and outcomes for children and families:

- **January 2020:** Front door.
- **October 2020:** Focused Visit – delivery of child-centred practice and care within the context of restrictions placed on society during the COVID-19 pandemic.
- **February 2021:** Children in Care, Placement Matching and Decision Making and Children with Disabilities who are looked after.
- **July 2021:** Child Protection (CP) and Child in Need (CiN).
- **November 2021:** Children in Care who are 16+, particularly planning for leaving care and Care Leavers.

There have also been the following Ofsted regulatory inspections:

- **November 2021:** Independent Fostering Agency– judged ‘Requires Improvement to be good’.
- **January/February 2022:** Voluntary Adoption Agency– judged ‘Good’
- We have also had inspections of all 5 of our Children's Homes- Grades: 4 x ‘Good’; 1 x ‘Requires Improvement to be Good’

This self-evaluation provides a summary of progress made against the findings of our 2019 ILACS; what we know about the quality and impact of our practice over the last 12 months, how we know it, and what we are doing to further improve.

This assessment reflects our Social Care Improvement Plan and Business Plan, addressing priorities identified following inspections, quality assurance activity and peer reviews. The Improvement Plan is regularly reported to the Northamptonshire Social Care Improvement Board, chaired by a Department for Education (DfE) appointed Independent Chair.

Section 2- Improvement in a challenging context

We are proud to have continued to drive and deliver improvements for children and families in Northamptonshire in a time of significant local, national, and global challenges:

- Global COVID-19 pandemic resulting in societal restrictions unprecedented in our times, and the impact of this on individuals, families, communities.
- Adaptation to virtual and hybrid ways of working as a result of the pandemic.
- War in Ukraine, withdrawal of allied troops from Afghanistan, and the associated impact on migration.
- Massive cost of living increases and impact on family income.
- Continued national shortage of social workers and other key worker professions, and an increasingly competitive labour market.
- A national placements market which is not meeting need – as identified in CMA report on Children’s Social Care¹ (March 22) and Independent Review of Children’s Social Care² (June 22).
- Brexit including the impact on the labour market.
- Local organisational changes – establishment of NCT, WNC and NNC.

During this time, we have achieved:

- **Improved quality of Social Care practice and management oversight**, which is helping to keep children safe, as evidenced in Ofsted visits and inspections, peer reviews and internal quality assurance.
- **More of our social worker posts are filled** 15.8% social worker vacancies in June 2022 (England average 17%) compared with 22.28% in October 2019 and no unallocated cases.
- **Improved working with our partners and a stronger strategic approach to early help, neglect and exploitation**; improved early help assessment, step down process and timeliness of support from NCT Children and Family Support Services.
- **An embedded quality assurance framework** working alongside practitioners to collaboratively reflect on practice, celebrate good practice and identify learning, which is ‘improving children’s experiences’³.
- **A permanent senior leadership team who ‘know the services well and are committed to improving the lives of children and young people’⁴** bringing stability, positive culture change and sustained drive for continuous improvement.

In November 2021, the Children’s Commissioner for Northamptonshire advised the Minister ‘*Given the progress secured and trajectory the service is on, I still believe that a continuing commissioner presence with the statutory powers entailed is more than is necessary as things stand.*’

In January 2022, the DfE issued a revised statutory direction which included the appointment of an independent chair of the Council’s Children’s Service Improvement Board at the end of the Children’s Commissioner’s tenure.

¹ <https://www.gov.uk/government/publications/childrens-social-care-market-study-final-report/final-report>

² [Final Report - The Independent Review of Children's Social Care \(childrensocialcare.independent-review.uk\)](https://www.childrensocialcare.independent-review.uk)

³ Ofsted monitoring visits November 2021 and July 2021

⁴ Ofsted monitoring visit November 2021

Section 3 - Self-Evaluation at a glance

What difference have we made to Northamptonshire children since 2019?

- Children are safe and are experiencing better quality support and outcomes.
- Children and families now receive more effective help at an earlier stage, which is making a positive difference to their lives.
- Children and families receive a swifter, more appropriate and co-ordinated response to vulnerabilities, concerns and risks.
- Children's needs are now better understood and supported.
- The majority of our children are cared for in a stable placement that meets their needs and achieves good outcomes.
- More children have been supported to safely return home to their families.
- Care leavers and those who support them are now more likely to be clear on what their plans are seeking to achieve.
- Children and families are now more likely to have better experiences as a result of a more stable and sustained Social Care workforce.

What are we proud of?

- The strides we have made in strengthening our partnerships and developing early help.
- The good outcomes achieved by the vast majority of our children
- The achievements of Children in Care, including educational attainment, as celebrated at our first awards ceremony since 2017.
- Our awesome and resilient workforce who have kept children at the heart of all they do through some of the most challenging times in our living memory.
- The recognition of the quality and outcomes achieved by our Adoption Agency and Children's Homes.
- The fact that we know ourselves well and are focused on working together to continually improve.
- The positive, reflective, and empowering culture we have developed together which is making a difference to our practice and our workforce.

What do we want to do next?

- Continue to increase the consistency of good quality strengths-based relationship practice.
- Continue to listen to our children and have their voice at the centre of all we do.
- Enable more children to remain in or return to the care of their families.
- Continue working with partners on consistency in applying thresholds, ensuring proportionate and appropriate support to children and families.
- To continue our work with partners to have a greater impact for children at risk or involved in exploitation.
- To increase our access to good quality homes that can meet the needs and care for our children.
- Continue to work with system partners to ensure we have the best possible support for the mental health, employment, education and training, and accommodation needs of our Children in Care and care leavers.
- Empower more of our workforce, particularly those of diverse backgrounds, to develop their practice and careers in NCT.

Section 4 - Progress against 2019 ILACS Recommendations

We are confident that children are safe in Northamptonshire.

Compared to 2019, the needs of children and families are better understood and supported; their experiences and outcomes have improved. Whilst some children benefit from brilliant support, we know some still experience inconsistencies; we continue to work tirelessly to improve where we need to.

The embedded document provides a summary of the progress we have made against the 2019 ILACS recommendations.



progress on ILACS
2019 recommendatic

Section 5- Progress against our Strategic Priorities for Improvement

These are the areas we are focusing on to achieve our ambition of making a sustainable improvement to the lives of children, young people, and families. They reflect the thematic areas for improvement identified in the 2019 inspection and subsequent monitoring visits:



Our Ofsted Monitoring Visit (November 2021) found:

Senior leaders demonstrate in their recently updated self-assessment that they **know their services well** and are **committed to improving the lives of children and young people**. Improvement plans are realistic and continue to be implemented, with success, despite the ongoing challenges of the pandemic.

Our Ofsted Monitoring Visit (July 2021) found:

'SLT has an impressive energy and relentless commitment to improving the lives of children in Northamptonshire'

Excellent Leadership – Our improvement will be driven by a stable senior leadership team that provides strategic leadership and direction, clarity of the vision for the service and sets clear priorities and expectations. The senior leadership team will be visible to and engage with all staff.

- **Full, permanent NCT senior leadership team (SLT)** in place since April 2021 supported by strong NCT Board. All strategic and most service managers are permanent this provides stability, clarity of vision and relentless drive for improvement.

- In July 2022, we appointed NCT's first **Young Chief Exec**, who is currently in our care and aspires to be a social worker. She and Colin have agreed joint commitments and will develop the role together to ensure it is meaningful and able to have a positive impact on our organisation and practice.
- **Monthly QA board** chaired by NCT Chief Executive giving senior leadership oversight of practice in a systemic and consistent manner.
- **Strong line of sight of NNC/ WNC Lead Members and DCSs** through monthly strategic and operational groups, Social Care Improvement Board, QA assurance meeting, Practitioners Improvement Board.
- **Regular engagement and visibility** of SLT through open door approach, Chief Exec's 58-minute sessions, comms, attending team meetings and QA activity alongside practitioners.
- Senior leaders **championing recognition of good practice**, 'naming the issue', empowering colleagues to make improvements to systems and processes through open communication and collaborative working.
- Our workforce has clarity on **our vision, commitment and priorities**, developed through 58-minute sessions with further refinement by the Practitioners' Improvement Board and Equalities Steering Group.
- 9-month **Leadership Development Programme** completed for all NCT managers (including SLT) with positive impact on practice and culture. This was developed with University of Northampton, Research in Practice and Beyond Behaviour (Functional Fluency) and **focused on enabling managers to empower each other, staff, children, and families and build a positive culture**.
- The Leadership Development Programme consisted of monthly sessions led by the Chief Executive, one to one development sessions and cross organisational learning sets which included an incredibly **well received session designed and delivered by our Care Leaver Apprentices on Empathetic Leadership**. The programme set expectations and provided clarity on a strengths based, collaborative approach. Improvement in leadership skills was reported by delegates.
- Other **leadership development opportunities**, including Research in Practice's Practice Supervisor Development and Practice Leaders Programme, mentoring, coaching, Signs of Safety Practice Champion training, masterclasses and bespoke support from Partners in Practice and Research in Practice.
- Clarity of standards and expectations through **Practice Model, Practice Standards and Supervision Policy** (refreshed and relaunched September 2021) and best practice examples shared on Learning Hub.

Impact

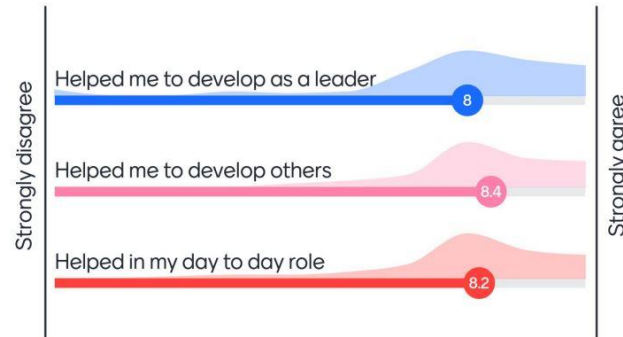
- **Continuing improvement trajectory** evidenced through Ofsted monitoring visits; as a result of strong support, positive challenge and drive for improvement from SLT, Lead Members, DCSs, NCT Board and Social Care Improvement Board
- Positive feedback received from colleagues attending the **Chief Executive's 58 minutes sessions** and via our Practitioners' Improvement Board about **SLT being visible, positive, and inspiring, and that communication has improved**.
- **QA activity shows an improvement in the quality of supervision**, and there is ongoing work with managers to ensure quality is consistently good across the board. Ofsted (July 2021) noted some signs of initial positive impact of revised supervision recording.
- **71% of Collaborative Reflective Practice Discussions (CRPDs) in last 12 months** scaled management oversight and supervision at 6 and above (out of 10)⁵ July 2022. Of this 12% scaled at 9-10; CRPDs since September 2020.

⁵ On a scale of 0-10, where 10 means management oversight is timely, effective and has a positive impact on the direction of work with the child and their family, and 0 means that management oversight is either missing or is ineffective

- **Staff consistently feedback** that they feel supported by managers in QA activity, peer reviews and Ofsted monitoring visits.

February 2022 Leadership Development Programme participant feedback

Leadership Development Programme



'It has helped me be more supportive in supervision. I had found some of the practitioners had a fixed mindset, so I am helping them to develop a growth mindset' - Manager about our Leadership Development Programme

What does this mean for children and families?

- Children and families are more likely to receive better quality, more timely support that meets their needs because our workforce is empowered, well supported, and clear about what is expected of them and what we're aiming to achieve.

Development of the Corporate Parenting Board (CPB)

- Newly elected Unitary councillors were provided with training on corporate parenting, safeguarding and the function of the CPB.
- Further training 'Corporate Parenting Through the Eyes of a Child' delivered in December 2021 to enhance CPB members' understanding of roles and responsibilities and the lived experience of Children in Care.
- Lead Member for WNC and joint chair of CPB has participated in the LGA Leadership of CPB training.
- The NCT performance scorecard is regularly reviewed by the CPB and training of Board members has been provided to help them understand the performance data and enable them to challenge effectively.
- Having two care leavers as members of the CPB provides a helpful perspective to the Board and challenges officers and members to be thinking differently.
- Updated terms of reference written in a young person friendly way.
- CPB is undertaking deep dive sessions on particular topics, led by subject matter experts including children and young people.
- CPB links closely with quarterly health network meetings, Virtual School Advisory Group and Children in Care and Care Leavers' participation groups.
- WNC and NNC Assistant Directors for Housing and Communities are members of the Board.

Impact

- CPB members' understanding of specific issues faced by children and young people in care has been strengthened.
- Council tax discount/ reduction scheme for care leavers in place from April 2021 NNC and WNC.
- Timeliness of Children in Care health reviews escalated within health services.

- An important function of the Board is to celebrate the achievements of children and young people and this is done at each Board meeting
- Young people's participation on the board has led to officers being required to be more specific about what positive outcomes mean and has challenged officers and members' thinking.

'The corporate parenting board has been strengthened recently and is showing some signs of impact in improving services and support for care leavers.' Ofsted Monitoring Visit November 21

What does this mean for children and families?

- The achievements, needs and issues experienced by Children in Care and Care Leavers are better understood by decision makers.

Recruit, Retain and Develop an Awesome Workforce – Improvement for children and families will be delivered by our workforce, who are therefore our most valuable resource

Recruitment

- **Significant improvements have been made since 2019** and as per the national picture, our workforce stability challenges are greater in duty and assessment and safeguarding social work teams. Vacancies, agency staff and caseloads are closely monitored, and managed service teams have been used to mitigate.
- We have **expanded the routes into social work roles** offering student placements, Step Up placements, frontline students (from September 22) who will become our NQSWs, SW apprenticeships and NQSWs.
- **Further 10 practice educators** being trained to support student placements.
- **Dedicated NCT recruitment team** and successful partnership with Opus providing relentless drive. All potential candidates are offered a conversation with the Chief Exec. **Improved processes to ensure social work vacancies** are filled quickly – ideally with permanent staff but utilising agency as required.
- The **partnership between NCT and Opus achieved a 'Highly Commended'** award at the Annual PPMA Excellence in People Management 2022 Awards.

Successes:

- **4 social workers recruited** from outside the UK in 21/22; **6 joined April- July; 3 due to start in September**; 1 due to start in Jan and further 8 in pre- employment checks.
- **26 NQSWs** joined in 21/22 and 15 to date 22/23; 12 NQSWs completed their ASYE in May 22, with 11 more due to complete in September 2022. Positive feedback continues to be received about NQSWs from parents/ carers, children, and colleagues/ partners.
- **8 Step up Graduates** started as NQSWs in May 2021.
- **10 Step Up to Social Work students started** in January 2022, 6 were current NCT employees.
- **3 social work apprentices** in safeguarding service, who are due to qualify in June 2023.

Retention and development

- Improved social worker **career path** with senior social worker posts and increased number of Advanced Practitioner (AP) roles.
- Robust senior oversight on **caseloads**, with action taken to ensure they remain manageable, whilst also ensuring all children have an allocated worker. Including redeployment, managed service teams, temporary assessment (non-case holding) social workers. We have increased the

Advanced Practitioner posts to one per team. Social work teams are also each supported by a family support worker and business support colleague.

- **Continuous professional development (CPD)** of our workforce is strengthened via our online learning hub, providing access to NCT specific training programmes, resources, and good practice and **bespoke CPD to meet our needs**, developed by our workforce. Research in Practice and Making Research Count membership provides access to evidence, resources, tools, and training. From November 2022, the transfer of L&D functions from NNC to NCT will provide opportunity for a more flexible, cohesive and bespoke CPD offer for our workforce.
- **Formal Teaching Partnership** progressing following successful DfE bids for 21/22 and 22/23.
- Additional **Signs of Safety Practice Champions** trained and Signs of Safety training available for the whole workforce.
- Approx. **800 nominations** were received for **the inaugural NCT workforce awards** in December 2021.
- **Salary scale pay increments** introduced for all NCT staff on 1st April 2021 and was awarded again in 2022, plus 2% pay award in April 2022.
- From Dec 2021, a **retention bonus** was introduced for social worker posts in priority services, **positively received by staff**.
- Encouraging retention across NCT by **changing our culture to being strengths based and empowering**; improving processes and systems; investing in our staff, through our Leadership Development Programme and professional development opportunities. The implementation of our **'conditions for success'** are expected to improve our retention of staff.
- **Additional Advanced Practitioner (AP)** positions created in front line social work teams, managing a small number of cases as well as supporting less experienced team members to increase knowledge and skills through mentoring, coaching, support, and sharing their practice expertise.
- Further **career development opportunities** through the creation of consultant social worker and deputy consultant social worker roles for our Frontline hubs.

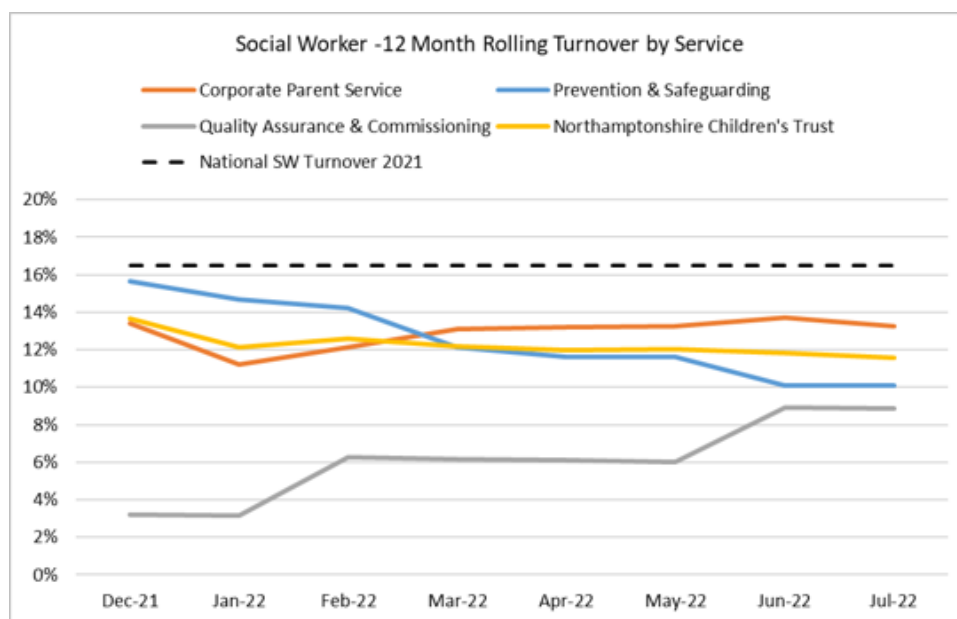
Once a colleague joins our workforce they will receive:

- ✓ Induction including discussion about learning styles
- ✓ Signs of Safety training
- ✓ Reflective Case and Personal Supervision
- ✓ Group reflection
- ✓ Research resources
- ✓ Learning Hub
- ✓ Continued professional development
- ✓ Collaborative Reflective Practice Discussions
- ✓ Supportive leadership including open access to senior leaders
- ✓ Exit interviews and learning - should a colleague move which happens for a variety of reasons we will undertake exit interviews and implement any learning



Impact

- 15.8% social worker vacancies in June 2022 (England average 17%) compared with 22.28% in October 2019.
- Our turnover rate of permanent social workers (11.57% 12 month rolling average) is lower than national average 16.6%, across all services (July 2022).



- 65% of agency and permanent social workers have been in post since NCT was formed (November 2020); and 71% of our permanent social workers started prior to November 2020.
- 20% of agency and permanent social workers have moved into more senior roles since November 2020.
- 6 NQSW's have moved into Qualified social worker positions in DAAT since January 2022.
- 15 previous NQSWs have now progressed into management roles.
- No unallocated cases in July 2022 compared with 199 in June 2019.
- Number of social workers above caseload targets⁶ has reduced across the board: June 2019 DAAT 25 above, safeguarding 37 above, Children in Care 7 above. Compared with July 2022 DAAT 12 above, safeguarding 18 above, Children in Care 3 above.

What does this mean for children and families?

- Children and families are now more likely to have better experiences as a result of a more stable and sustained Social Care workforce.

Equalities, Diversity, Inclusion & Equity

- Our **Equalities Forum** was set up at the request of colleagues, to inform, educate and support each other and provide a safe space to share experiences and views. **Open for the whole workforce** and attendance has been up to 110. A real success of the forum are sessions designed and delivered by colleagues based on lived experiences, including My Gender and Me; My Prejudice and Me; My Life in a Bubble (living with Autism); My Identity, Heritage and Me.
- **Dyslexia network** was set up following My Dyslexia and Me session .
- **Equalities week** (Nov 2021) ran **12 sessions** open for all to attend; Practice related training with a focus on equalities; 'Me and My...' lived experience sessions; fun session on learning sign

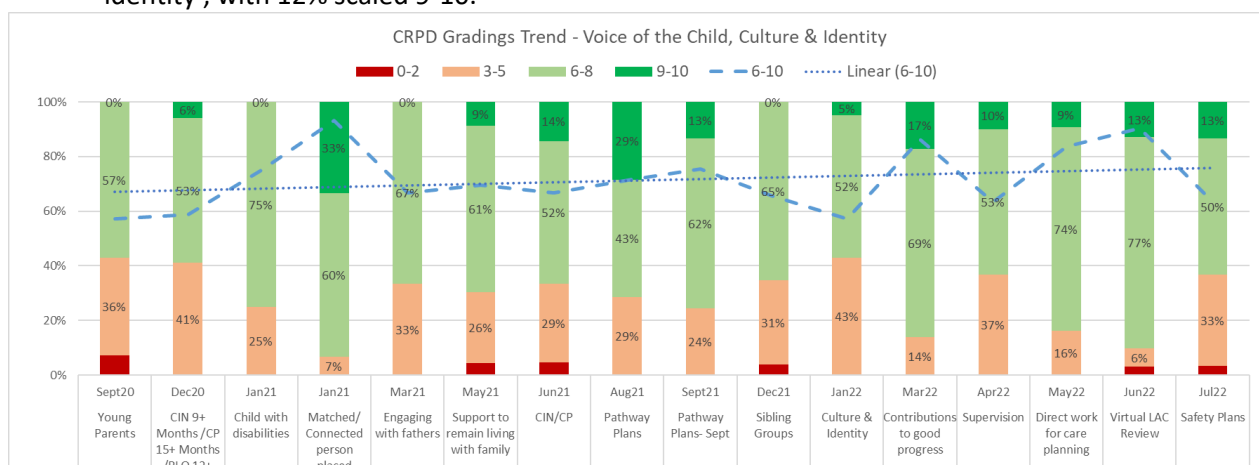
⁶ Caseload targets are DAAT: 35; Safeguarding: 22; Children in Care: 20

language. The week also included a virtual exhibition of our culture and identity, a map of NCT’s heritage, equalities conversations in teams and sharing of resources. Good level of engagement from workforce and positive feedback received. **Equalities Week 2022** is taking place again in September with a greater range of sessions being delivered by practitioners and foster carers.

- **Equalities Influencers** throughout NCT to **champion equalities issues**, share resources and best practice, signpost colleagues and listen to any concerns. Equalities Influencers in place across service and role description agreed.
- **Culturally sensitive practice training** developed by members of steering group with young people, available for all practitioners.
- **Workforce communications** increasingly sharing and celebrating a more diverse range of events and festivals.
- **‘Leading in Colour’** session held as part of Leadership Development Programme in March 2022 – positive feedback received.
- 3 managers successfully applied **Black and Asian Leadership Initiative (BALI)** programme in 22/23.
- NCT asked to be part of **Research in Practice anti-racist practice resources and conference**.
- We have recently established an **over-representation steering group** to specifically look at children who are overrepresented in matters of concern e.g.: violent crime, CSE, CCE, Children in Care, exclusions. We will reflect on our current approaches and determine what needs to change to ensure any support is tailored to the cultural, diverse and inclusion needs of each individual child and their family.

Impact

- 77% feel equality, diversity and inclusion has become more of a priority since we became NCT.
- 66% feel supported to progress their career in NCT.
- Membership of the forum is building confidence to work with diverse families.
- Since the forum started, it has been found that E & D is not just an overlooked agenda item / afterthought, it is becoming more prominent as a discussion topic.
- Collaborative Reflective Practice Discussions (CRPDs) since September 2020 show an improvement trend for voice of the child, culture and identity.
- 74% of CRPDs over last 12 months scaled 6 and above out of 10⁷ for voice of the child, culture and identity ; with 12% scaled 9-10.



⁷ On a scale of 0-10, where 10 means the child's voice is clear throughout their record, their cultural and identity needs are explicitly captured and understood, and these elements are considered and influence our work with the child and their family, and 0 means we cannot hear the child's voice and their cultural and identity needs are not understood, considered or supported

"It's one of the most inspirational, informative meetings I've attended. I am truly humbled to have listened to the experiences of these courageous and awesome people". Member of NCT workforce about the Equalities Forum

What does this mean for children and families?

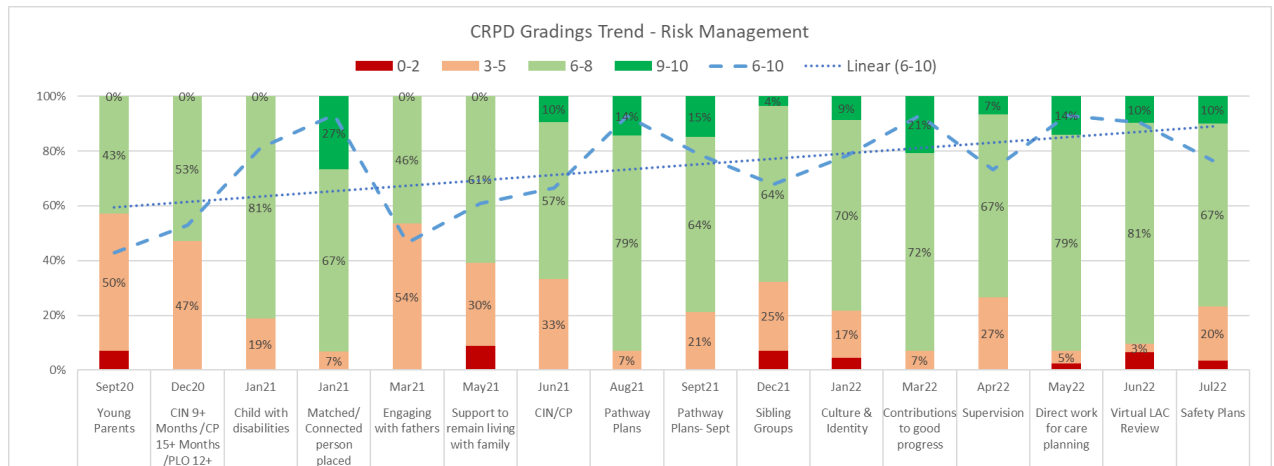
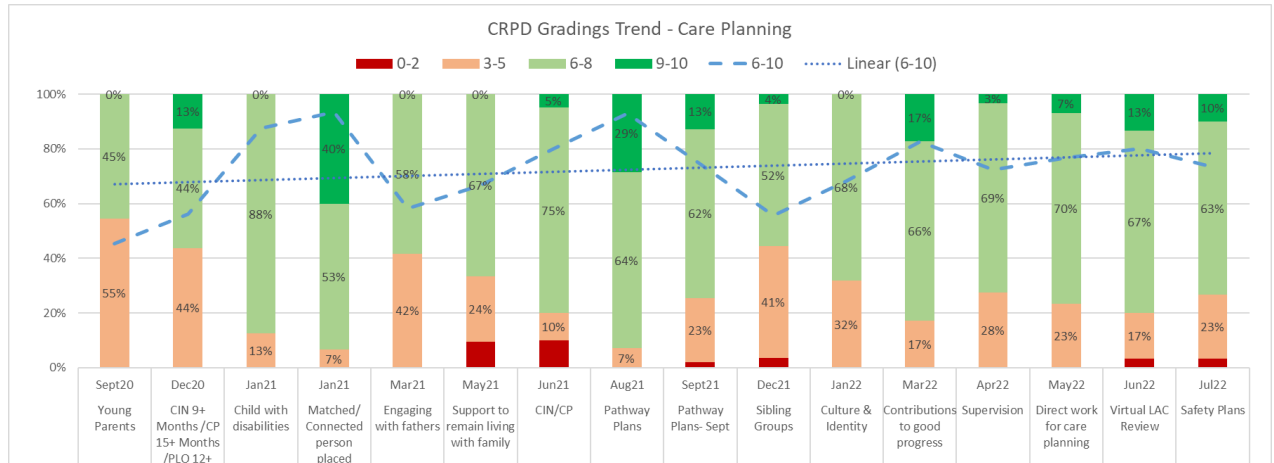
- Children and families' individual needs are now better understood and supported.

Strong Relationship Based Practice- We are focused upon evidence-based practice that works with children, young people, and families to help them achieve positive changes. Our practice model is child-centred at its heart and evidenced through all we do.

- Relentless focus on **improving consistency in the quality of assessments and plans.**
- **Increasing confidence and skills in using Signs of Safety.** Additional Practice Champions trained, resources and best practice on our Learning Hub and Signs of Safety training (including bespoke and bite size) available for all workforce and partners. Following short term funding we have now been able to mainstream SofS AP and Project Manager posts. University of Northampton undertaking 12–18-month research project into the **impact of Signs of Safety in NCT.**
- **Partners in Practice** have provided support alongside services to improve practice, bespoke support from Research in Practice for 7 team managers and 3 service managers. Additional 20 managers supported through this programme from Jan 2022, and coaching/ mentoring from PIP and Social Work Academy. Colleagues identified for Frontline Pathways programme 22/23.
- **Good practice celebrated and shared** through a range of channels such as: Learning Hub, emails from Chief Exec, PSW newsletter, 58 minute sessions.
- **Refreshed and relaunched our Practice Standards, Practice Model and Supervision Policy** to provide clarity of expectations. Ofsted (July 2021) noted some signs of initial positive impact of revised supervision recording.
- We benefit from **strong engagement of children and young people through our formal participation groups** - Children in Care Council, Care Leavers Council and Shooting Stars for children with Special Educational Needs and Disabilities (SEND), Young Inspectors, and the recently formed Dynamic Youth (children who are subject of CIN or CP plan) whose voice shape our vision, transformation and review of services.
- Reinforcement that **voice of the child** is considered and recorded by all practitioners. Engagement of children and young people has been expanded through commissioning the **Mind of My Own app** and establishment (from April 2022) of groups for children who are the subject of CIN and CP. Our **CYP Engagement Strategy** is helping us to focus on improving our engagement at individual, service, and strategic levels to improve practice and support.
- We have an excellent **Advocacy service** who support children and young people with plans, meetings, complaints etc. This includes specialist support for children with SEND.
- We have developed '**language that cares**' to assist us in using language that is appropriate and meaningful to children and young people, rather than jargon or labelling language; our QA activity shows more case records are being written to the child which is helping them to be more child and outcome focused.
- **Cultural competency training** developed with input from children and young people, available for all practitioners.
- Further training has been made available to support **working with families to develop safety plans.**
- '**We are NCT...Being great at what we do**' campaign where each month has a focus on particular areas of practice with resources and good practice shared.
- Family Support Workers deliver **direct work opportunities** alongside social workers and offer engagement activities with children forming **positive and meaningful relationships.**
- **APs, now in every front-line team,** are supporting colleagues in strengthening quality of practice.

Impact

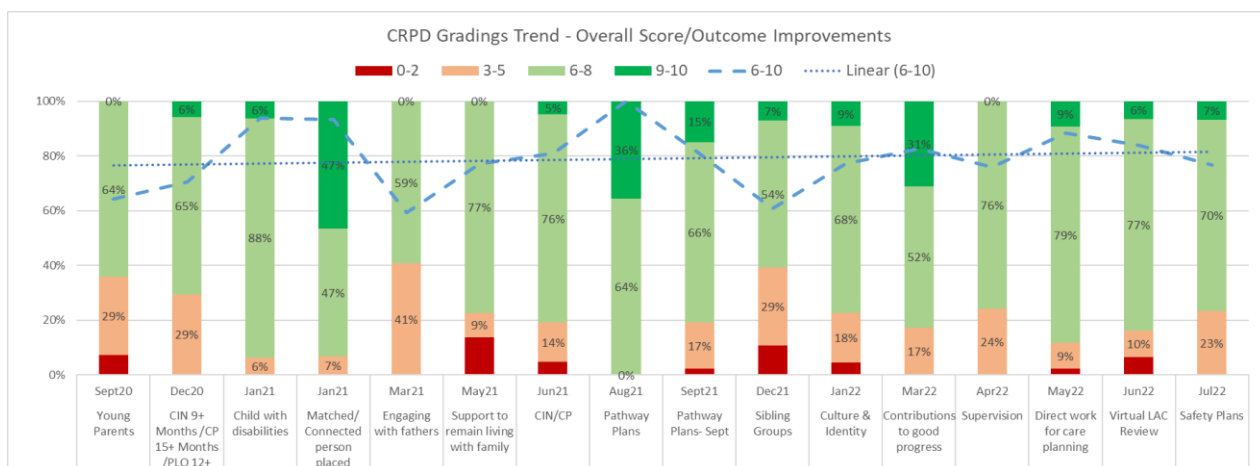
- 75% of CRPDs: audits over last 12 months scaled 6 and above (out of 10)⁸ for care planning quality (July 2022); with 10% scaled at 9-10.
- 81% of CRPDs in last 12 months scaled risk management at 6 and above (out of 10)⁹ July 2022. 11% scaled at 9-10.
- 81% of CRPDs over last 12 months scaled 6 and above (out of 10)¹⁰ for outcomes (July 2022); with 12% scaled at 9-10.
- CRPDs since September 2020 show an improvement trend for outcomes, risk management and care planning.



⁸ On a scale of 0-10 where 10 means the child has a good quality, outcome focused plan which is progressing effectively in a timely way, and 0 means that the child has a plan which is not clear about outcomes, is not progressing quickly enough, and is not of a standard we would expect for the child

⁹ On a scale of 0-10 where 10 means any risks to the child have been identified quickly, responded to in a timely way, we have worked alongside the child's network to manage the risk and the child is safe, and 0 means that we have not identified risk, our response has been too slow, the child's network has not been supported well enough to manage the risk, and the child is at risk of harm

¹⁰ Thinking about the overall experience of the child and the impact of our work with them over the last 6 months; on a scale of 0-10, if 10 means the child is safe and happy, enjoys good health and wellbeing, and their outcomes show they are resilient and fulfilling their potential, and 0 means the child is not safe and healthy, has low resilience, and are not fulfilling their potential



What does this mean for children and families?

- Children are receiving timely support that better meets their needs.

Insightful Quality Assurance and Learning – We know ourselves and our practice well through rigorous quality assurance.

- **Strong and improving Quality Assurance**, which social workers value, with oversight of a monthly Quality Assurance Board, chaired by Chief Exec, which reviews feedback from service led performance clinics, CRPDs, practice weeks, voice of the child, learning from complaints and escalations, and other QA activity.
- **Practice Weeks (including our Young Inspectors and teams drawn from across services)** have been held across the majority of services providing a rich, qualitative picture of practice. Young Inspectors design their methodology and feedback their findings directly to senior leaders, providing valuable insight and ideas for improvement. Action plans have been developed to implement actions.
- Developed our **quality and performance analysis at team level**. This includes continuing to develop managers' skills and confidence in quality assuring work alongside practitioners, focusing on the impact of our work on children's experiences and outcomes.
- We have benefitted from expertise of our **Partners in Practice** and **Regional Improvement and Innovation Alliance** to provide objective views of the quality of our practice and identify improvement actions, which we have implemented
- **Learning from quality assurance** is shared and bespoke continuous professional development delivered to improve practice, for example culturally sensitive practice training. Briefings used to disseminate audit findings.
- The **quality of our quality assurance has improved**, through training, bespoke support, and reflective moderation, meaning we have confidence in what it tells us.
- NCT quality assurance activity generally reflects findings of peer reviews and Ofsted visits and **moderation, reflective discussions and training is helping to increase the quality of QA** activity undertaken by managers.

Impact

- Practitioners report that CRPDs and Practice Weeks provide positive reflective learning experiences.
- Ofsted monitoring visits (July and November 2021) identified our comprehensive quality assurance framework is improving children's experiences.
- CRPDs since September 2020 show an improvement trend for overall outcomes for children.

"I have learnt so much this week and it has been such a pleasure to not only witness great practice, but also the strong relationships the team have with their young people, it was lovely to see! I have definitely taken some ideas back, that we can use in our team"

**Leaving Care Practice week team member.
Sept 22.**

What does this mean for children and families?

- Children and families are experiencing better quality support and outcomes.

Healthy Partnerships – Effective partnership working is essential to good practice

- **Strengthened strategic partnerships** through NSCP, Social Care Improvement Board and CYP Transformation Board (ICS).
- **NSCP Early Help, Neglect and Exploitation strategies** in place and action plans being developed / driven by NSCP sub groups.
- Exploitation strategy and action plan informed by **multi agency Tackling Child Exploitation project** involving Research in Practice, Children's Society and University of Bedfordshire.
- **Early Help Strategy and Action plan** informed by Dept. Levelling Up, Housing and Communities Early Help System Guide and DWP Reducing Parental Conflict Planning Tool.
- **Early Help Strategic Board** and West and North networks established with positive levels of attendance, continuous professional development, and networking.
- Projects supported by Public Health (PH) funding improving **mental health and wellbeing** of care leavers and children in NCT foster care.
- **Partner SofS, EHA and thresholds training** being delivered.
- **2 education posts** in place in the MASH to provide additional support to schools.
- **Closer working relationships between DCT and Adult Social Care** and processes and timescales for children referred to Adult Social care have been strengthened.
- **Improved working with unitary Housing leads** – NCT CFSS has led on 16/17-year-olds Housing Options / Homelessness establishing a steering group, action plan informed by colleagues at Department for Levelling up, Housing and Communities and joint protocol for 16/17-year-olds refreshed.
- **Improved multi agency working and co-ordination** through establishment of partnership missing steering group.
- **Multi agency resource panel** and improving use of multi-disciplinary teams have improved shared responsibilities for children's placements.
- **Strong partnership with Homes 2 Inspire**, provider of our residential care block contract, and focus on strengthening partnerships with other local and specialist placement providers.

Impact

- Working together to develop and agree strategies has led to a shared understanding of issues facing children, young people, and families, what we are collectively seeking to achieve and shared responsibilities for doing so.
- Strengthened relationships means any issues are identified and resolved more quickly, and good practice and learning is shared.

- Improved co-ordination of work to support children and families across agencies.

What does this mean for children and families?

- Children and families receive a swifter and more appropriate response to concerns and risks; and children now receive a more co-ordinated and appropriate response to their vulnerabilities.

Robust and Effective Resource Management – We understand the key drivers of the budget and budget managers understand the financial impact of their decisions. Budget managers are equipped with support and systems to effectively monitor and forecast.

- We are dealing with the **national placement sufficiency challenge to improve experiences and outcomes for children** and achieve better value for money. With success to date in increasing NCT mainstream and resilience foster carers in 21/22; increasing number of external providers on our frameworks; improved quality of our NCT fostering agency; delivering 5 NCT Children’s Homes; adding an additional home to our block contract; commissioning of two new emergency Children’s Homes and YMCA supported accommodation; bidding for DfE capital funding in partnership with trusted and ethical partner; improving support to sustain placements.
- **Work to improve the efficiency and effectiveness** of placements, commissioning, and brokerage processes, following external review by People Too.
- NCT Fostering recruitment and marketing strategy with **clear plan of recruitment activity** in 22/23.
- Working with WNC and NNC to secure **additional properties and capital funding** to increase residential care provision.
- **Collaborative redesign** of short breaks provision for children with disabilities to enable more of the right support at the right time.
- Improvements being made to organisational **processes and procedures** to improve efficiencies and experiences for workforce, including freeing up time for practitioners and frontline managers.
- Improvement in **budget oversight and forecasting** supported by Finance and Resources in place from April 2021. Effective use of resources has enabled us to **commission managed service teams** to address capacity issues. Like all areas we are facing significant pressures on placement budgets due to the national sufficiency challenges.
- NCT is considered a **responsible Data Controller** for the purposes of the UK GDPR, following ICO self-assessment, and have met standards required.
- NHS Data Security & Protection **compliance**.
- **98.3% of NCT’s workforce had completed Data Protection Essentials & Cyber Security training** as of June 2022. This meets and exceeds the NHS DSPT compliance requirement of 95% of total workforce.

Impact

- To date we have secured an additional 11 residential care beds for sole use of NCT by the end of 2022, including in emergency/ urgent situations.
- The proportion of Children in Care for 2.5+years in the same placement for 2+years/ placed for adoption has increased from 61% in 2019 to 68.3% in 2022; our focus is on reducing the proportion of children who have had 3+ moves in the last 12 months.
- 94.7% of care leavers are in suitable accommodation (YTD July 22) which is above the England and stat neighbour average.

- Net gain of 2 NCT fostering households in 22/23 despite challenges of the pandemic and national shortage of carers.
- Of 65 children who had received therapeutic support directly/via carer at end of June 6 (9%) had experienced a placement breakdown against a baseline of 30%<.
- NCT foster carers who have completed Therapeutic Parenting with a clinical psychologist reported going from a 70% chance that the placement would end, to a 70% chance it will continue.
- Review and negotiation of existing placements has resulted in better suited support for children and young people's needs and achieved £1.2m savings in 21/22.
- People Too review of placements commissioning and brokerage (February 2022) found:

'In some areas, NCT is managing, and meeting need as effectively as comparators. Despite this, some intractable issues are present that require creative and innovative solutions.

Leadership, insight, and analysis is allowing NCT to focus on the right things, with many plans in flight to address existing deficits.

What does this mean for children and families? The majority of our children are cared for in stable placements that meet their needs and achieve good outcomes.

Section 6- What difference are we making for the children we support?

Children in need of Early Help

What do we know about the quality and impact of our practice?

- Improved partnership approach, driven by NSCP Early Help Strategy as highlighted above, is enabling a more co-ordinated and effective early help offer across Northamptonshire.
- A simplified, more accessible EHA and Support Plan, developed with partners, was launched in February 2022.
- Permanent Children & Family Support Services (CFSS) AD has strengthened leadership, providing a clear and robust framework for overseeing the quality and impact of the service, ensuring it is child-centred from the moment we start working with a child.
- One referral pathway for external partners through Partnership Coordinators, integrated into the MASH and simplified step-down process has enabled children and families to receive the support they need more quickly.
- The strengthened and enhanced Partnership co-ordinator roles in MASH enables more children and families to be supported early with the right level of intervention that meets their needs promoting right support, right time, right service principles.
- All children worked with are seen alone at least once per month, their voice is heard and lived experience is incorporated into support plans. This is monitored by team managers and supervisors and progressed in team meetings and regular peer support/group supervision sessions.
- We understand that strong anti-discriminatory practice has a positive impact on children and young people, strengthening their positive sense of identity, and that they can participate fully when their diverse needs are understood and met. This practice is promoted through case reflection in supervision, group supervision activities and team meetings.
- Significant improvement in number of families achieving outcomes via Supporting Families Programme in 21/22 compared with previous years.
- All CFSS staff are fully Signs of Safety trained and complete annual safeguarding training; and senior practitioners and managers are Signs of Safety Practice Champions. The use of Graded Care Profile resources is encouraged to support practitioners to identify and evidence neglect.
- We've implemented a CFSS performance scorecard and QA activity to better understand activity and impact.
- Families in Corby (area of high deprivation) are able to access additional targeted commissioned support through Corby Children's Centres, which achieves positive impact for families.
- Since its inception in June 2021, CFSS' Family Solutions team has improved children's lives by working in partnership with families and other agencies to strengthen family resilience and achieve sustainable change, and enabled children/young people to remain within their own family.

CFSS

<u>Partnership Co-ordinator</u>	<u>Strengthening Families</u>	<u>Young People's Service</u>
<ul style="list-style-type: none"> • Whole Family Working • Drive EHA • Community Connectors • Support Network VCSE • Partnership Collaboration • Training • Events / Programme Delivery • MASH Contribution • Initial support to families 	<ul style="list-style-type: none"> • Whole Family Working • Shared delivery with partners • Children Centre Activity • Parenting Programmes • Domestic abuse support groups • Children with additional needs - SEND Support • Domestic abuse support groups 	<ul style="list-style-type: none"> • Whole Family Working • Contextual safeguarding -Exploitation • Missing RHI • Attendance & Exclusions • Gangs / Crime • Youth Homelessness • Family Solutions – Edge of Care • Mentoring Support Team

“I have had a lot of troubles this year with my mental health and wellbeing, also K my daughter has had a lot of struggles this year, but Jo has been there to help and support both of us. We are sad that your involvement is finishing but like all good things they have to end, we cannot thank you enough for your time effort patience and understanding it means so much to all of us.”

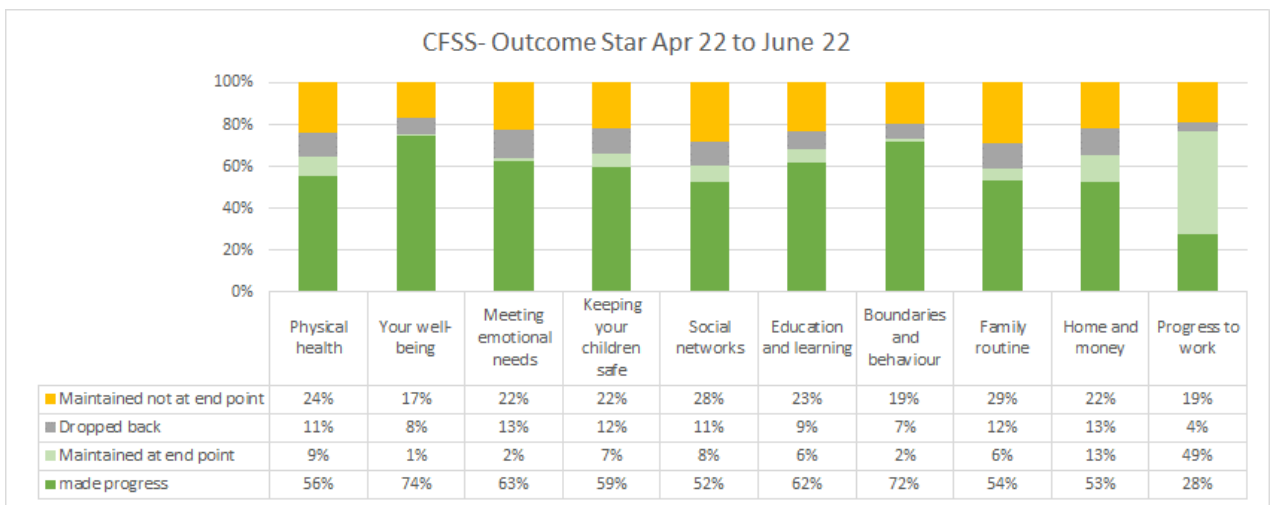
Letter from a parent to CFSS

How do we know?

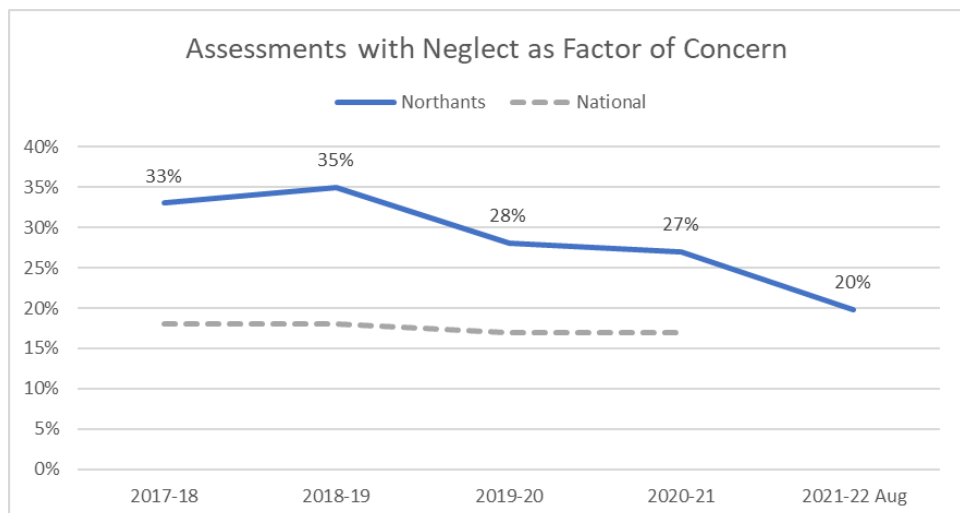
- More timely intervention with 82% of families allocated a CFSS worker within 2 days of receipt (YTD July 2022).
- 100% Strengthening Families payment by results target achieved 21/22 and on target to reach 100% for 22/23.
- 63% families as successful closure to CFSS (July 2022).
- Only 4% of children escalated to CP and 4% to CiN with 12 months of CFSS EHA (YTD June 2022).
- 63% of children (n. 79) at risk of care remained at home following support from the Family Solutions team (July 2022).
- 66% of young people and families supported by Family Solutions Team (edge of care) reported improvements (July 2022).
- **Partners in Practice Review (January 2022)** found that Partnership Coordinators are “*very experienced and passionate about the role of EH and the impact that this level of support and intervention can have on children and families.*”
- **CFSS Practice Week (February 2022)** findings included:
 - 67% of children considered were scaled 7, 8, or 9 which shows that these children have assessments and plans which demonstrate good multi agency support is in place.
 - Children’s assessments and plans evidence good multi agency working. CFSS workers are motivated, dedicated, and skilled at building relationships; they are working alongside partners with some complex families, and consent is managed appropriately.
 - A CFSS strength is finding support in the community for families – alongside this there needs to be more focused work exploring the family network, finding the safety there, and engaging family members in safety planning; this will help families be their own resource to sustain change.
 - Practitioners work in an open, honest way and children and families told the Practice Week team they appreciated this; they trusted the workers because of this. In every

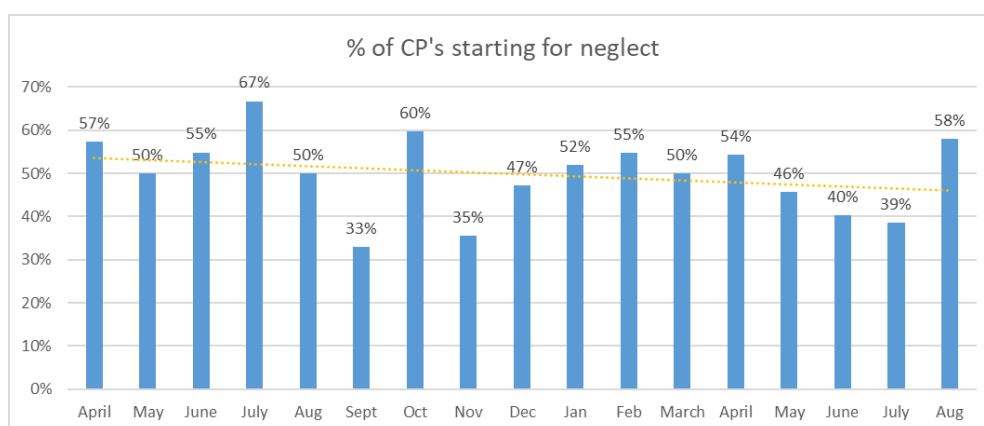
piece of work the Practice Week Team looked at, practitioners knew and understood the individual needs of each child in the family.

- The timeliness and quality of supervision and management oversight was variable on the children’s records reviewed and discussed. Managers are knowledgeable about children’s circumstances and always available for case discussions; sometimes these are not captured on the child’s record.
- The Practice Week Team saw multiagency practice in CFSS that supported better outcomes for children and young people and examples of outstanding CFSS practice were seen.
- Over 70% of families accessing support at Corby Children’s Centres reported reduction in isolation, increased understanding of child development and relationships with their child, greater level of support from community services.
- Over 50% of families supported by CFSS in Q1 22/23 made progress in all outcome star domains, except progress to work where 28% made progress and 49% maintained (see graph below).



Earlier and better identification of neglect means we have made some headway with closing the gap between Northamptonshire and National data, and know there is a way to go (graphs below)





What does this mean for children and families?

- Children and families now receive appropriate help at an earlier stage, which is making a difference to their lives.

What are we doing to further improve?

- CFSS Service Plan shows key performance indicators for the service, with timescales to ensure the momentum for improvement is maintained.
- Management oversight on casework was identified in Practice Week as an area for improvement. This will be managed through case supervision observation as part of CFSS QA Activity.
- Strengthening of communication, safety planning, documented family stories at step down to avoid families telling stories again and to help CFSS to pick up quickly.
- Increase use of Family Network Meetings to work with the child's networks to help build the safety plan.
- Improve age-appropriate engagement in team around the family meetings.
- Improve how we use the voice of the child and families to inform changes in service delivery.
- CFSS Staff will be offered Level 4 Accreditation in Working with Complex Families to improve their competence and capabilities for improving outcomes for children.
- Solution Focused Practice training is planned for Autumn 2022.
- Developing closer working relationships between councils' school attendance support teams and the Strengthening Families team to facilitate a seamless approach to addressing school attendance and behaviour issues, including increasing use of EHAs by school attendance.

Children and young people experiencing risks from outside of the home and exploitation

What do we know about the quality and impact of our practice?

- **Improved partnership approach**, driven by NSCP Exploitation Strategy as highlighted above, is enabling a more co-ordinated and effective response across Northamptonshire.
- RISE (Reducing Incidents of Sexual Exploitation) and Missing Teams moved into the NCT Young People's Service (September 2020) to ensure a **continuum of support across tiers**, meaning our response to missing and exploitation can target both high and medium risk. This will enable **high level contextual support** right through to prevention work.
- All children assessed as high risk of sexual exploitation receive a **health, police and allocated NCT practitioner as a minimum**.

- **Multi agency RISE school's prevention package** commenced in September 2021 including staff training, and Sarah's story (CSE survivor) shared from year 7 and a parent's event. Schools are using this for lesson plans and 3 schools have requested additional support re groups of children where there are emerging exploitation concerns at a lower level.
- **Exploitation / Missing training tailored for Children's Homes** delivered to 2 NCT homes and 54 external placement providers in Q1 22/23. This has been beneficial for relationship building and indirectly supporting our children in care.
- **Northamptonshire Police are leading Operation Makesafe**, supported by partners and local businesses, which aims to **raise awareness of Child Sexual Exploitation within the business community** including hotels, taxi companies, fast food outlets and licensed premises. Operation HOTELWATCH has also been set up to ensure that hoteliers are both aware of and proactive in tackling CSE/CCE and potential linked offences that criminals may either carry out or seek to facilitate on their premises. Additional training targeted at hotels that fail test purchases or where there are other concerns.
- **CE Specialist Nurse continues to act as a source of expertise** for health agencies across the county. Including a **liaison line for advice and support to practitioners**, dissemination of relevant research and resources to health agencies and provision of safeguarding supervision and training to health practitioners across the health economy. Also representing NHFT/RISE at the Vulnerable Adolescent Panel to give health advice and recommendations for the lead professionals as appropriate.
- **Young people** supported by RISE **receive an up-to-date, in-depth health assessment** offered either face to face in school/clinic or via telephone/video. Emerging and unmet health needs are addressed quickly.
- **Good communication is evident between the Young People's Service, RISE case workers and health professionals** to identify any emerging needs including sexual health, emotional health, trauma, physical health, drug and alcohol, smoking cessation, sleep, eating disorders, bereavement, ADHD/ASD referrals.
- We take a **"whole family approach"** to support the young person and we offer support to families in mitigating risks that their child faces, such as by increased supervision, or supporting the CYP into alternative peer networks.
- **Trained all Young People's Service and Family Solutions practitioners** in exploitation, RISE, and to conduct home return interviews.
- **Implemented partnership Vulnerable Adolescents Panel (VAP)** and a co-ordinator who triangulates our missing, exploitation and vulnerable adolescent data.
- NYOS have developed a **vulnerability screening tool**, alongside asset+ to identify needs and required referrals.
- NYOS and police gang and violent crime pilot project in Wellingborough has identified several young people that are suspects of multiple offences that have never been in receipt of a positive intervention or formal outcome. NYOS are working with these young people through prevention and diversion to provide **positive interventions to reduce the likelihood of further offending**.
- **Close work with Barnardo's** to ensure that professionals understand the National Referral Mechanism (NRM), the Independent Child Trafficking Guardianship Service (IGVA) and what reasonable and conclusive grounds mean. This will **ensure professionals will have a full understanding** of the referral process into NRM and the support that Barnardo's can offer to us. It will ensure that all professionals will be able to recognise the signs of exploitation. NYOS and CYPSS have developed a group of NRM champions who are receiving additional training and support in this area that can assist practitioners in and across NCT to make referrals.
- Established a missing steering group reviewing end to end processes and top 10 missing children. **Support from CFSS offered at every HRI** to any top 10 missing children who do not have an allocated worker.
- **Home return interview (HRI) format changed to reflect SoS model**, outlining worries and what is working well, for the professional and the young person. There is an **emphasis on the voice of the child** and asking individually tailored questions to each child, young person and family to establish individual cultural, ethnicity and identity needs and support offers. By doing so, we can make accurate recommendations and actions from this.

- In the past 6 months, 13% of children in care have had a missing episode, a slight rise from the previous year. Work is required to understand the reasons for this, but hypotheses include an increase in the number of young people being accommodated who are at risk of criminal exploitation and the **increasing needs of young people relating to their emotional well-being exacerbated by the pandemic.**
- Outcome Star tool and the RISE risk wheel allows practitioners to effectively risk assess families and young people, while **capturing their voice and understanding their strengths and needs.**
- **Multi agency review** of the Adolescent Risk Management (ARM) process dealing with exploitation and extra familial harm in June 2022 has identified key areas for improvement now being taken forward.
- **Increased use of multi-disciplinary teams/ complex case discussions** to oversee and manage risks for Children in Care.
- Participation of the MASH decision makers in Channel Panel enable informed decisions to be made
- **Positive partnership working** between the separated children's team and relevant agencies has led to better decision making when considering the safety and welfare of young people who might be at risk of or have been identified as being trafficked and/or are likely to go missing.
- The use of NRPF Connect identifies unaccompanied young people who present to or from another local authority which **helps to identify missing young people quickly.**
- **Missing episodes for separated children have been reduced** by consistently listening to young people's wishes and feelings. Where appropriate changes have been made, this has contributed towards overall stability and safety.

How do we know?

- Increase in referrals seen and an increase in knowledge of the local picture as a result of school's prevention package.
- 80% of home return interviews were completed within 72 hours of being found in 21/22.
- ARM Review (June 2022) found that all agencies found the VAP valuable and felt that it was able to progress and accelerate a multi-agency response for young people at risk of exploitation.
- ARM Review (June 2022) found the current process is not well understood by partners; risk assessments and plans can be more consistently and effectively used and there is opportunity to improve trusted relationships with young people.
- All agencies working closer together to improve response to exploitation e.g., improved information sharing to ensure effective joint decision making and planning.
- Increased knowledge and expertise in practice.
- Police arrested 14 men in Q1 21/22 for child sexual exploitation related offences, with a further 43 live investigations; 34 arrests for online offences and 43 children safeguarded online.

What does this mean for children and families?

- **Children now receive a more co-ordinated and appropriate response to their vulnerabilities.**

What are we doing to further improve?

- Implement actions arising from ARM review recommendations, including a new operating model, exploitation guidance and toolkit (developed by University of Bedfordshire and Hackney and aligned to Signs of Safety), and scoping development of a multi-agency team for criminal and sexual exploitation. Timescales and leads to be agreed by NSCP exploitation subgroup in September 2022.
- Continue mapping of young people, and their associates via monitoring of missing episodes, community incidents, and referrals into RISE function and / or the Young People's Service. We continue to monitor themes, places, and people of concern and share these across the partnership to improve the joint approaches to combatting issues where we anticipate they may arise.

- As a result of learning from the Wellingborough pilot we are implanting a countywide Prevention Partnership Panel - multiagency triage approach that will mobilise services to respond and support children suspected to be involved in violence at the earliest opportunity
- Broaden our community response by continuing to offer training packages and bespoke resources to a wide variety of organisations across Northamptonshire and strengthen work across hospitals, CFSS, residential homes, Children in Care teams and leaving care to support vulnerable children and young people. Also, to identify an accessible training package for adults services who support over 18s.
- RISE plan to develop a more preventative, contextual approach to working with groups of young people in their own places and spaces and address current gaps in police capacity.
- NYOS are looking to gain a further understanding of the use of section 45 defence in court in relation to exploited children, to enable a more appropriate response for them.
- Risk register for Children in Care where concerns of significant harm exist in relation to missing, criminal and sexual exploitation and offending behaviours to improve oversight and risk management.
- Whilst Children in Care and Leaving Care services are working more closely with YOS when young people are remanded or sentenced to custody and keeping more in touch with the young people themselves through visits and calls, the increase in gang cultures within Northamptonshire is meaning further work is needed to divert young people from crime. This has been recognised by the Children Safeguarding Partnership and work is planned between the services to better understand the situation and action needed.

Children in need of help and protection

Robust Front door - MASH & EDT

What do we know about the quality and impact of our practice?

- **Threshold and Pathways multi-agency training is improving partnership knowledge** of thresholds and awareness of pathways to early help support; quality of referrals is improving.
- **Revised operating model to enable a better management of the contacts and referrals** in the MASH and achieve more consistency in decision making together with better application of thresholds by all professionals was introduced in 2021.
- **A professional consultation line** is in place and any young people calling the general number are transferred to a specific line providing prompt access to a social worker who they can talk to about their worries.
- **RAG rating system used and all cases meeting threshold for a Social Care assessment are allocated timely to a social worker**, with a 4-hour window to progress red rated cases for strategy meeting where appropriate.
- All contacts relating to child **safeguarding concerns have social work oversight.**
- Through **screening domestic abuse notifications daily**, we ensure that risks are understood, and safety plans are implemented in a timely manner.
- **Re-referral audit completed by service managers in May 2022.** We now only record concerns relating to an individual child for the specific child only. DAAT consider strategy discussions being held in cases where there have been multiple closures due to non-engagement and the concerns remain evident.
- **EDT workers are confident in applying a threshold decision** for new referrals.
- **EDT has positive relationships with partners** meaning children in need of immediate protection are responded to promptly and interim safety plans are agreed and implemented.
- **The Golden Hour policy** (designed by EDT and the custody inspector) ensures that on every occasion a child is arrested and taken to custody, Social Care is informed and within the first hour share information with custody officers. This provides police with a social perspective of a child's needs and feeds into the wider police policy of ensuring that their custody suites are 'trauma

informed' and each communication with the child is mindful of their history, and seeks a way to divert them from offending.

"She is so excellent just want to say how well she handled today and helped me & my children. I could not have asked for a nicer and professional worker lovely person thank "you TK. And this country needs more people like her."

Feedback on our MASH

How do we know?

- 683 partners participated in thresholds and pathways training in 21/22 and gave it an average rating of 4.7 out of 5.
- Rate of referrals to MASH is now in line with stat neighbour and England averages.
- MASH referrals given an outcome within 2 working days has been strong (95% in April 2022) but currently impacted by police dealing with backlogs- close joint working and plans in place to address this.
- PIP review Jan 2022 found '*evidence of substantial improvements in the systems and process and good progress across the front door in relation to the improvement journey*'.
- PIP review May 2022 found '*Cases dip sampled by the review team, thresholds for Early Help were appropriate and observations of calls demonstrated that time and care is taken to discuss the worries with the caller*'.
- PIP found evidence of more consistent application of thresholds surrounding cases being progressed for assessment.
- In May 2022, PIP identified improvements made following their first review in Jan 2022.
- Whilst we still have further to go to bring in line with statistical neighbour and England averages, re-referrals have reduced from 35.6% in 21/22 to 30.3% July 2022.
- Complaints received by the MASH regarding threshold and feedback have reduced significantly and compliments have increased.

What does this mean for children and young people?

- Children and families receive a swifter and more appropriate response to concerns and risks.

What are we doing to further improve?

- Supporting partners to further improve quality of referrals, including through provision of clear analysis and recommendations lined to threshold document to referrers.
- We continue to focus on improving quality of danger statements (analysis of assessments) in MASH and EDT; better use of signs of safety in strategy discussions in EDT; and group supervision and voice of the child in MASH; helping to further improve the quality of our practice.
- Consistency of threshold application for strategy discussions.
- Outcomes of NFA remain higher than we would like, and it remains an area of priority focus; although % of s.47s leading to ICPC is in line with statistical neighbour and England averages.

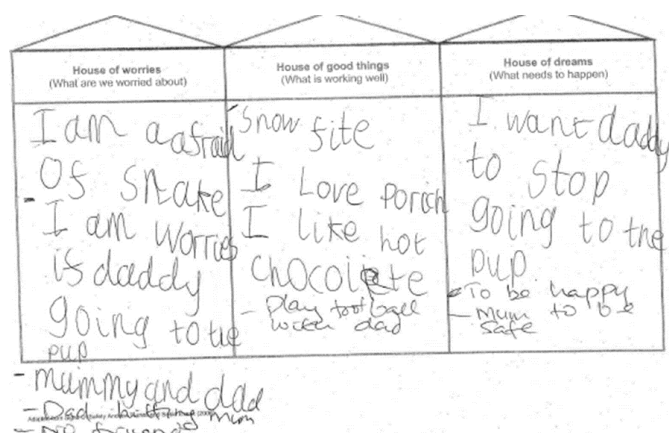
Children in need of help and protection

Robust Front door – Duty and Assessment (DAAT)

What do we know about the quality and impact of our practice?

- Leadership capacity has been strengthened with a second permanent service manager post enabling better support for social work teams
- The increase of AP positions has increased experienced social work capacity within the teams.

- DAAT social workers have more manageable caseloads than previously, allowing them to spend time with children to understand and better assess their needs and better identify risks.
- Buddy system is effective in offering support to the team on duty. This ensures that strategy meetings are timely, children are seen promptly, and responses are proportionate to the presenting issues.
- Learning and reflections from group supervisions and audits are contributing to an improvement in practice in DAAT.
- Individualised actions for each child at the end of a section 47 enquiry.
- Family Support Workers and other professionals known to the child completing direct work in DAAT to inform assessments and plans.
- All families supported by DAAT have an initial safety plan.
- Section 47 NFA Audit (February 2022) found sufficient identification of risks in 90% of the cases audited. In the 10% where risks were not sufficiently identified, birth parents not living in the family home were not always consulted as part of the assessment; history had not been robustly considered, whilst for some, the voice of the child was not consistently evident on the child's file. Subsequently, there were reflective learning sessions held across the service which has contributed to an improvement in this area of practice.



"Just wanted to thank you for your contribution and very good presentation during ICPC for XX family. I really appreciated you getting in touch with me way before the conference to discuss X and X participation. Their attendance made a massive difference to the outcome and quality of the conference. I was so pleased with your practice- safety plan had been completed with the family prior to the conference and saved on the records, genogram and chronology had also been updated before the conference. Well done and keep up the good work"

Feedback on our DAAT

How do we know?

- 78% of DAAT visits happened within 5 days in 21/22 and above 74% in April & May; the recent decrease is seen due to impact of police PPN backlog, increasing complexity, and staff change.
- 96% of single assessments are completed in timescales (YTD July 2022) compared to 86% in June 2019.
- Management oversight at the point of allocation within DAAT is consistently over 95%.
- 38% of single assessments lead to no further action and 30% to early help/ universal (YTD July 22)
- 36% s.47s leading to an Initial Child Protection Conference (YTD July 22), in line with statistical neighbours and England averages of 37%.
- PIP review, Jan 2022 found Social Care Assessments consider the child's history and there is evidence of them being more child focused.
- PIP review, May 2022 found 'performance is being used to continue to support and drive practice and there is an enhanced understanding of statutory timescales'.

- Audit activity and feedback from the Child Protection Chairs has shown the quality of danger statements is improving.
- 60% of DAAT staff are agency workers. However, 50% of the agency workers have been in the service for over 18 months and some for over five years.

What does this mean for children and families?

- Children are now receiving timely support that better meets their needs.

What are we doing to further improve?

- Continue our relentless drive to achieve a stable workforce in DAAT.
- Ensure good quality and timeliness of all assessments.
- We continue to focus on ensuring that direct work is consistently available on children's records, that plans are SMART and developed with families and work with families is explicitly linked to plans.
- We continue to identify ways to reduce workload pressures for DAAT teams.
- Recording of what is written to children within CareFirst is being expanded to include assessment documents etc and has enhanced child-focused practice.
- Further reflective learning sessions regarding risk identification to further support and improve practice.

Children in need of help and protection

Children subject of a child in need or child protection plan

What do we know about the quality and impact of our practice?

- We are focused on **quality and consistent practice**, relationship based social work that empowers families, whilst maintaining performance and compliance.
- **Decision making is prompt by managers** escalating children's circumstances to strategy meetings and section 47 investigations.
- **Social workers take pride in their work and know their children well.** They show commitment and dedication to supporting children and their families to make and sustain positive changes in their lives.
- **Direct work is used to understand the wishes and feelings of children and young people to achieve positive changes** that are in the best interest of children. We use a strengths-based approach to work purposely, openly, and considerately with the whole family network which includes extended family members in our assessments and planning. All families are encouraged and supported to take the lead in making a safe plan for their child when concerns are identified.
- **The vast majority of children and families have timely visits** providing meaningful contact with a social worker, a plan that is regularly discussed and updated so actions are meaningful, and progress is made.
- **Capturing the voice of the child within visits** has improved and our recording is child focused.
- **Child in Need plans and visits are monitored weekly** to ensure timescales are met and plans progress. Managers have oversight to ensure that plans do not drift, that families are only subject to plans as required and that families step down to CFSS at the appropriate stage.
- **Advanced Practitioners support individual social workers** and deliver SoS support to the teams as a group. This has had a positive impact on plans and danger statements and there is noticeable improvement, however it is not yet consistent across all the teams which is the outcome we are striving for.
- As part of our Leadership Development Programme action learning, our **SoS AP led an initiative with the Corby Safeguarding teams during Q4 21/22, focused on implementing safety plans devised with families and children**, with the aim of reducing subsequent re-referrals. Through this,

other areas of development were also achieved, such as increased use and confidence in SofS mapping. Learning from this project has been implemented across other parts of the service.

- The Child Protection Chairs duty system **enables social workers to discuss and reflect on need** for ICPC, this is valued by social workers.
- Having Child Protection Chairs allocated to a 'linked' DAAT or safeguarding team and sharing good practice **has significantly improved relationships and enhanced the common and shared goals we all hold towards those we work with, and for.** Case escalations are dealt with in a more collaborative way which has positive impact for the child and family and supports our learning.
- Reviews of CP cases at 9 and 15 months (then quarterly) by Service Managers ensure **there is a clear trajectory for the case** to either step down from a child protection plan or to progress into PLO.
- Additional consideration by Service Managers for appropriateness of repeat CP plans in chronic neglect cases **is enabling improved decision making.**
- **Action for Children provide valuable additional support** to families known to safeguarding services through short or medium-term interventions and multi systemic therapy which has a positive impact for children and families, enabling families to stay together. Additional value is brought through partnership with Aldi to distribute surplus and essential food and clothing to families in need.
- When the councils receive new elective home education requests, a check is made if the child has a CIN or CP plan, or are known on other reporting systems (ie domestic abuse or missing persons), discussions with partners are held to review the suitability of the EHE request. For those children who are known to the Children's Trust who want to reintegrate back into school, officers work closely with admissions and with families/social worker to support school placement and successful transitions. **All new EHE requests are offered a home visit from an Inclusion officer who will also seek the voice of the child.**
- **Council CME Tracking Officers keep in direct contact with the child's social worker** until it is known where the child is living and confirmed as attending the school allocated. MASH are also informed of a new address and new school if the case has been open to NCT during the past 12 months (but currently closed).
- **13 of our children known to safeguarding services took part in a camping trip in Summer 2022,** helping to increase self-esteem, kindness, patience, teamwork, self-awareness, and confidence.

"I would like to thank Brian for the report for today's conference. I like how you write to the girls rather than about them in a very child friendly and simple language. You are explaining clearly the reason and the journey the girls have been through during social care intervention including their views. I am impressed by your child focussed approach. Well done and keep up good work."

CP chair regarding a Safeguarding Social Worker

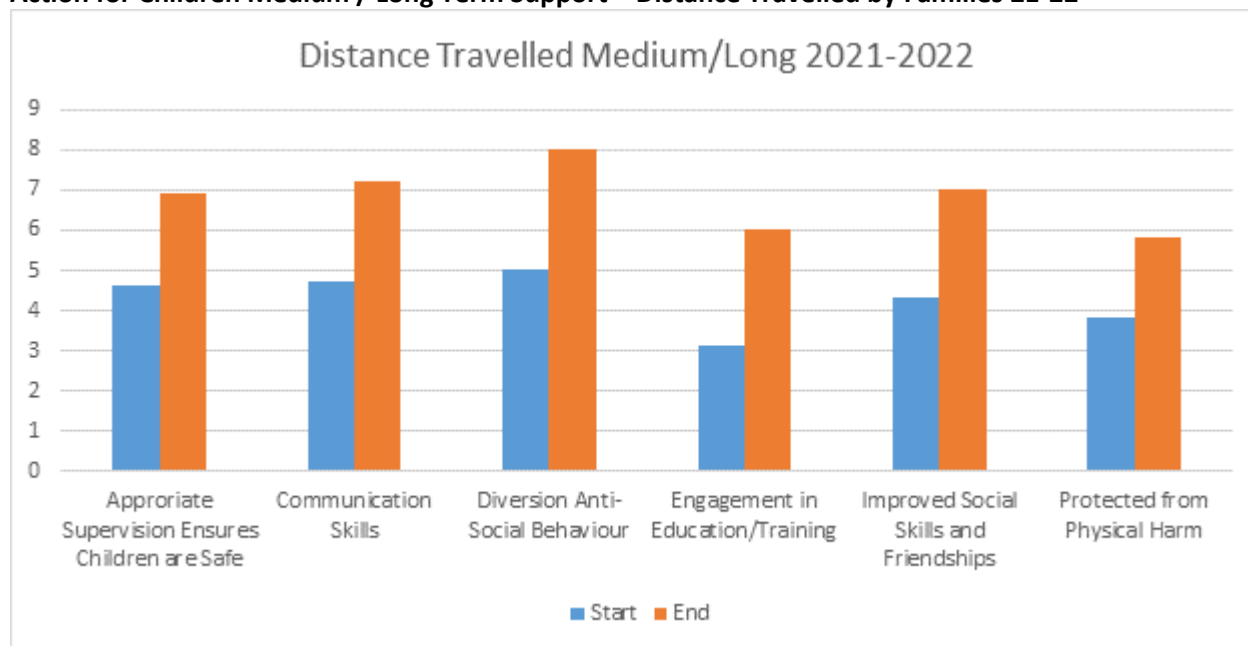
How do we know?

- CIN visits were 79.7% on time; 81.5% up to date CIN plan (YTD July 2022).
- CP visits were 89.4% on time (YTD July 2022).
- 82.7% Initial Child Protection Conferences held on time (July 22); in line with England average of 83%
- 98.9% CP reviews completed within timescale YTD July 2022, above national and stat neighbour averages.
- The proportion of repeat CP plans is higher than we would like at 32%, above comparators.

Timeframe	September 2020	January 2022	March 2022
CP plans 9+ months	269	190	166
CP plans above that were 15+ months	78 (29%)	50 (26%)	57 (34%)

- The proportion of neglect CP plans open for more than 15 months reduced by more than a half, from 23% to 11% between January 2021 and August 2022.
- Neglect audit (August 2022) found there is more progress to be made in consistent use of Graded Care Profile, up to date chronologies to provide full picture, greater focus on unique characteristics of a child and their family to appropriately address concerns, focus on neglect in supervision. Strengths were evidenced in practitioners' commitment to building positive, effective working relationships with those children and young people they are supporting, involvement of partners, detailed plans which are being regularly reviewed, the actions on plans are mostly SMART.
- The proportion of children subject of a CP plan for 2+ years has been below comparators for some time, however, there have been higher proportions in a couple of months this year, likely due to sibling groups.
- Since last year, there has been an increase in children of longer-term child protection plans to progress to PLO from 16% to 40%.
- 35% of the children reviewed subject to long term child protection plans were also subject to PLO or legal proceedings which is a significant increase on the previous year (May 2022).
- CP Conference Practice Week (June/July 2022) findings included:
 - Child Protection Chairs support clear planning with SMART actions so everyone understands their roles and responsibilities; check that parents understand and enable their participation and ensure meetings stay focused on the child and impact for the child.
 - Diversity, culture, and language are considered but it would be even better if we explored how this linked to engagement and progress for our young people.
 - Whilst training for DSLs to advocate for children in conferences has taken place, we are yet to see this result in increased advocacy for children by someone with an existing relationship with them; and wider use of Mind of My Own could also help more young people to participate.
- Reduction in formal escalations by CP Chairs down to 6 in the last quarter compared to 15 in the previous quarter. 89% of all issue raised were resolved within 5 working days.
- The number of complaints about Safeguarding services has reduced.
- 29 families receiving medium/ long term interventions or MST from Action for Children in 21/22 de-escalated from CIN or CP plan; further 8 de-escalated in Q1 22/23, 3 escalated and 21 maintained their status. Two further cases due to be de-escalated within 1 month of intervention closure.
- 96.5% of children supported by MST remained living at home at the end of the intervention
- 12 month follow up of families supported by Action for Children: 84% of children remained in the family home; 75% were no longer under a Social Care plan

Action for Children Medium / Long Term Support – Distance Travelled by Families 21-22



What does this mean for children and families?

- Children and families are receiving better quality support that is improving their experiences and outcomes.

What are we doing to further improve?

- Continuing our relentless drive to achieve a stable workforce to reduce likelihood of families having changes of workers and plans drifting. As well as continuing to recruit NQSWs, our two new Frontline hubs in the Safeguarding Service from Sep 2022 will provide another means of 'growing our own' social workers.
- Continue to encourage better use of chronologies to demonstrate and evidence neglectful parenting. An action plan is also being developed in response to neglect audit (August 2022) findings.
- Continuing to focus on ensuring all visits are purposeful and drive planning for the child.
- Further development work in respect of safety plans and ensuring that the voice of the child strongly influences the plan and what is needed to ensure the child feels safe within the family environment. The plan is agreed with parents and the extended family and is regularly reviewed.
- Continue to improve the quality of plans across the teams, and ensure we evidence within the plans the impact and outcomes for children, the voice of the child is prevalent and informs and influences the plan.
- AP's will continue to work with individual social workers and the teams to consistently incorporate signs of safety.
- To continue to improve and sustain key performance indicators and ensure that children are seen in a timely manner, visits are recorded promptly, and CiN meetings are held in timescale.
- Using feedback from our young inspectors see how we can make venues for our child protection conferences more child friendly.
- Reduce the likelihood of repeat CP Plans by ensuring safety plans are robust and have been tested when stepping cases down.
- We will continue to develop and grow our 'Dynamic Youth' group for children known to safeguarding services, whose input will help us further improve our practice and support.

Children with Disabilities

What do we know about the quality and impact of our practice?

- **DCT social workers now have more manageable caseloads of 11-21**; this has led to greater quality in practice for children and families, as they are more able to deliver high quality relationship-based practice and direct work.
- Children who are assessed as requiring a small package of support to meet their needs well with no other support needs identified now have an annual review and updated assessment where the child and family are seen. **This means that families receive an appropriate level of intervention and SW capacity can be focused on children with the highest levels of needs.**
- **Assessments are signed off by managers** to ensure quality and any actions completed as necessary.
- **Performance is generally good** with children being seen regularly and having up to date CiN. All Children in Care have and up to date care plan.
- Whilst there have been challenges with health assessments being completed in timescale, **this has been much more positive for disabled children who are in care** with the figure for Children in Care allocated to the Disabled Children's Teams sitting at 71.4% (DCT 1) and 82.4% (DCT 2).
- **Supervision and management oversight is notable area of improvement** and has been a focus area having previously been identified as an area for improvement in CRPDs. Managers have undertaken the Research in Practice PSDP programme which has enhanced their supervision and management skills in terms of quality supervision which understands and promotes equality diversity and inclusion for families and also our workforce.
- **Writing to the child has shifted the focus and lens through which we view children and families** and how we work in partnership with children and families. Children and young people and their lived experiences are at the centre of the work completed. Their records now reflect this more. There is evidence that young people are increasingly attending their meetings, how and where appropriate, and this ensures that children are at the centre of everything that we do.
- **Social stories are well used within the Disabled Children's Team** with some key practitioners being very skilled in doing this. These will often be used to support young people to understand their plans, what is happening next and changes and transitions.
- **Commissioned short breaks continued to be highly valued by families.** However, we know families could be better supported and less reliant on overnight short breaks through a more comprehensive and appropriate offer of non-residential short breaks.
- **There are a small number of children with disabilities living in unregistered placements** due to sufficiency challenges in residential care / residential schools to meet these children's specific and complex needs.
- Children and young people are referred to Adult Social Care when they are 16 years old, to improve co-working and smooth transitions, with children's social workers retaining case responsibility. Team Managers **track this is being completed within their teams.**
- **Adult Social Care allocate a social worker as soon as possible**, at least by the age of 17 years, and the Care Act assessment will commence, usually jointly with the allocated social worker in DCT.
- **North and West Transitions Managers are now in post in Adults Social Care** in the councils – reviewing 16 and 17 year olds to ensure they are on track for assessment and planning in adults – this will allow issues to be identified more proactively.
- **Monthly meeting between DCT Service Manager and Transitions Managers**, quarterly meetings with DCT and Adult Social Care team managers being established for North and West.
- **Transitions Managers are also members of Multi-Agency Resource and Residential Short Breaks Panels** which provides early notification of young people who may require continued services from Adult Social Care.

How do we know?

- Children in Care with an up-to-date health assessment stood at 71.4% (DCT 1) and 82.4% (DCT 2) (July 2022).
- 61% of children have an up-to-date assessment (July 2022).
- NCT QA September 2021 found outcomes improving for the majority of children reviewed.
- DCT are currently supporting 86 16- and 17-year-olds (August 2022). Of these, 63 (73%) have been referred to Adult Social Care. Of those not yet referred, 3 are 17 years old and high priority; and 18 are 16-year-olds (of whom 8 turned 16 in the last 3 months). 1 of these children is a Child in Care who turned 16 in the last 3 months and a referral is in progress. 4 of the children who have not yet been referred receive resource only support from DCT so have fewer complex needs.
- 70.8% of families receiving support from the sleep service said there had been changes in the quality of family life.
- Complaints have significantly reduced within DCT.
- Compliments for DCT often highlight the 'above and beyond' work that many social workers do and also the strength and importance of relationships with parents/carers and children and young people and the difference this makes.
- Ofsted monitoring visit (November 2021) found '*when disabled children in care reach 16, they benefit from pathway plans that identify their strengths and needs for the future*'; and '*some disabled children experience delay in transition to adults services*'

What does this mean for children and families?

- Children with disabilities and their families are receiving better quality social work support that is improving their experiences and outcomes.

What are we doing to improve?

- Continuing with our focus on ensuring children have an up to date, quality assessment.
- Increase the recording of management oversight and supervision.
- Following decision of NNC and WNC to have their own transition managers in Adults Social Care services, we will develop transition strategies with each council.
- Transitions guide for parents in development, to be co-produced with Northamptonshire Parent Forum Group.
- Implement redesign of our short breaks and respite services, which has been developed in conjunction with parents and practitioners.
- Continue to work with providers and explore all options to address challenges faced as result of workforce shortages in the personal care sector and placement sufficiency for children with complex needs. This includes supporting unregistered providers to apply for Ofsted registration.
- Expand the membership of our 'Shooting Stars' participation group to include more children and young people supported by DCT. Also, develop a short and long-term plan for this group to shape developments overseen by the SEND Accountability Board and the CYP Transformation Board as well as NCT services and support.

Children in Care

What do we know about the quality and impact of our practice?

- **Staffing within the Children in Care service remains predominantly stable** with permanent & agency social workers who report being well supported by their teams and managers.
- **We held our first celebration event since May 2017** for our children and young people in care to receive awards that recognise their achievements, thanks to sponsorship secured by the Chief Exec. The feedback from children and carers was overwhelmingly positive, with areas for improvement relating to administrative and logistical points. 175 children attended along with 177 carers **“Look at our kids just being kids 😊”**
- Summer 2022 also **saw NCT’s first camping trip for 20 of our Children in Care**, helping to increase self-esteem, kindness, patience, teamwork, self-awareness, and confidence.
- **Our Children in Care Council helped the DfE by providing feedback on their report to UNCRC on how the UK is addressing Children’s Rights** and helped create a young person’s version and 3 videos that can be found at [How we are working with the United Nations to protect children’s rights - The Education Hub \(blog.gov.uk\)](https://www.blog.gov.uk/2022/07/20/how-we-are-working-with-the-united-nations-to-protect-childrens-rights/)
- **Strong senior management oversight** on all new admissions into care through either AD agreement or presentation at a weekly gateway panel.
- Legal Gateway Panel and Case Progression Team enable a lean process, **ensuring the right cases are escalated into PLO and legal proceedings**, and their progression and outcomes are closely monitored and reviewed. Our work during the PLO process means we are better prepared going into court, resulting in fewer independent assessments being completed during proceedings, and children achieving permanence in a timelier way.
- To ensure the correct level of support prior to birth, **we are now encouraging consideration for unborn children to become subject to the PLO processes earlier in the pregnancy** where appropriate, to allow for purposeful partnership with parents to effect change and support earlier permanence.
- By working with families within pre-proceedings, **around half of the children who met threshold have stepped down from pre-proceedings without going to court.**
- **There has been a rise in the number of children subject to interim care orders** over the last 12 months (from 258 to 280). This included a number of large sibling groups. A Public Law Court subgroup review of children subject to care proceedings for an extended period of time found the unavailability of judicial capacity to timetable final hearings and the instruction of experts were the main cause for the longest delay. Other factors included complexities where there are international issues, such as assessing family members who live abroad.
- The Director of Children’s Social Care is the chair of the Local Family Justice board and has monthly meetings with the Designated Family Judge, alongside meetings with the Assistant Director of CAFCASS. This **provides an opportunity for discussion around strategic opportunities, learning, any issue of concern or challenges, and ensures open and positive communication and continued progress is made.**
- Since its inception in June 2021, **CFSS’ Family Solutions team has improved children’s lives** by working in partnership with families and other agencies to strengthen family resilience and achieve sustainable change. This has enabled children to return to their family after a period in care, provided it is safe and, in the child /young person’s best interests to do so.
- Since the launch in January 2021, the Separated Children’s Team has been working under the auspices of Operation Innerste. This means that **children and young people are no longer detained by the police which has helped to eliminate any unnecessary trauma.** This has provided a much slicker process for admitting the young person into s20 care with the bonus of resource savings which instead can be invested in the young person.

- **We have introduced clear reunification assessment tools** (adopting NSPCC framework) to support the safe return home for children, trained champions and the Family Time Service now positively supports reunification plans.
- **We have strengthened the SGO pathway** through improved joint working, information and training for prospective SGO carers and training for staff to enable families to make informed decisions.
- Strong performance management has **maintained regular visits to our children** with those in more fragile care arrangements benefiting from more regular visits and contact.
- In January 2022, we introduced a more **child friendly format for 'My Care Plan'** combined with social work assessment, designed to be completed with children. It outlines the overarching aims and steps needed to achieve them. This has been received positively by children as easier to use.
- **IRO service is now tangibly (seen in young people's records) overseeing and driving plans with increased focus on timely responsive actions** that make tangible improvement to children's lives. The introduction of 'Link' IROs has led to improved relationships, communication, and sharing of good practice between IRO and Children in Care services. Targeted escalations in June 2022 as a result of feedback from children about co-producing care plans have had a positive impact, with an increase in plans being completed with children.
- **Children's reviews are usually only held outside of timescales if it is deemed to be in the best interest** of the child or young person, and action is taken if there are any administrative delays.
- The IV service facilitates special and long-lasting friendships for young people and their IV's. Many of our matches **last into the young person's adulthood as a consistent & trusted friend**, outside of professional roles / responsibilities.
- Targeted signs of safety training for Corporate Parenting Service on priority areas to have **greater impact for Children in Care**.
- **Greater support and modelling from corporate parenting management** and experienced staff to improve depth and analysis within social work assessments.
- Introduction of corporate parenting service permanency tracking arrangements providing **both oversight and drive to ensure timely planning for children**.
- Learning from our time in lockdown, and following feedback from children and young people, the IROs use a variety of methods to conduct children's reviews, (in person, virtual or hybrid), **this is supporting greater attendance of children at their reviews**.
- Children and young people have fed back to IRO's that they find having the IRO's one-page profile prior to their first review as it helps to make it feel more informal. The timeliness of first reviews has improved with the timeliness of subsequent reviews remaining stable and positive – **this means the vast majority of our children have their plans reviewed in a timely manner**, and the vast majority participate in their reviews.

"Thank you for just being there for whenever I need you and even when I don't need you."

A child in care about their social worker

"The actions you have taken have helped us to stay focused and gave us hope, as all we asked for was a 2nd chance and support, we are proud of the journey we have taken and all the obstacles we had to overcome, and we are so, so grateful for everyone who has supported our children. Be proud of yourself because what u do brings family's like ours a bit closer and that's priceless"

Feedback from a parent about an IRO

"I would like to say thank you to A, for keeping me up to date with my children and for treating me with respect and like a mother." **A parent regarding their child's social worker**

- The Virtual School (VS) places works with partners to **optimise the quality of children’s personal education plans** (PEPs). In the best PEPs, there is a golden thread running through, detailing the aspirations and needs of the child, progress made, and the ongoing support professionals are putting in place to help the child realise their ambitions
- The VS helps **children to achieve positive educational outcomes** through regular monitoring of attendance with schools. Regular liaison with Designated Teachers for early identification of attendance issues, ensuring timely Personal Education Plan (PEP) meetings take place, discussing gaps in learning and ensuring SMART targets are in place to address them, including appropriate use of PP+ and recovery funding. **Children’s skills** are increased through a range of VS activities including sports, arts, and outdoor education, with 139 children attending sessions in 2021/22 academic year
- VS Officers’ work is evidence-led, based on analyses of patterns in the cohort’s PEPs to address issues and improve outcomes; eg quality of PEPs
- The VS has a **robust quality assurance and audit process** in place for PEPs and regular training for officers, school staff, parents/ carers which participants say provides a stronger understanding of how to develop and implement strategies for supporting currently and previously looked-after children within the school environment. VS officers are using an increased understanding of the impact of trauma and attachment issues on education achieved through training to support colleagues. Training on exclusions appeals has also enabled VS officers to better advocate for children in care
- WNC/NNC Education colleagues **not commission any unregistered alternative provision** for Children in Care.
- For those Children in Care who are not on a school roll, i.e. children missing education (CME), **the VS has an increased focus on their support** including more frequent PEPs (6 times a year), a single point of contact within the service, increased management oversight, and multi-agency discussions. The VS works with partners to ensure children have access to full time DfE registered school places.
- For those young people in care who are NEET, the VS **hold monthly multi-agency meetings, have a single point of contact, and have regular contact with Prospects** (NCT commissioned careers advice and guidance service).
- **VS’s support ensures that children transitioning to adoptive parents are out of education for the shortest time possible** and fosters relationships between adoptive parents and their children’s school.
- Our partnership with Homes to Inspire (H2I) and Prospects (both part of Shaw Trust) is enabling **more flexible use of resources to improve outcomes for Children in Care**. Prospects Advisers and H2I Education Officer review the plans of young people living in our block contract homes monthly, and co-ordinate support from both organisations, including careers guidance from Yr 9 - 11.

Health

- The vast majority of our Children in Care have a completed **SDQ, with a higher proportion than nationally scoring within the ‘normal’ range**. Our focus is on ensuring they are used effectively within care planning for Children in Care by all agencies. A trial of a new pathway has seen some evidence of SDQs being considered within review health assessments and supervision.
- **A higher proportion of Children in Care have an up-to-date dental assessment so far in 22/23**, in comparison with the previous two years when the pandemic impacted. However, it remains lower than we would like.

- We are worried about the low proportion of our Children in Care who have had an initial health assessment on time, and although there has been some improvement in timeliness of review health assessments, this remains lower than we would like. **We have reviewed and improved our internal processes** to ensure timely referrals are made and understand the issue relates to capacity within health and availability of appointments. We have escalated through NSCP and Social Care Improvement Board.

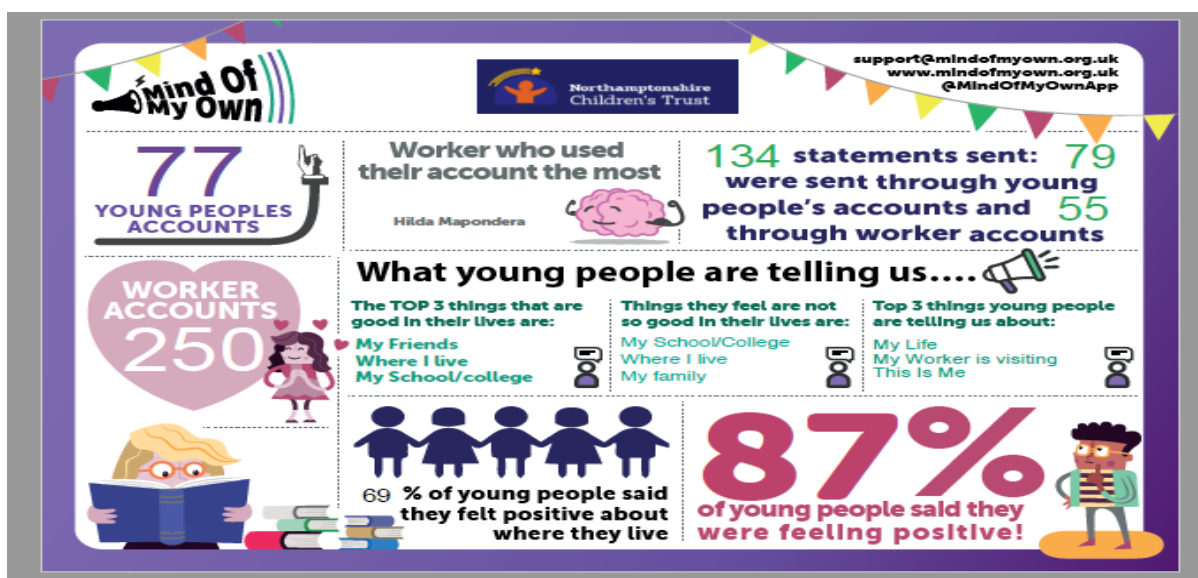
Placements

- **While the majority of our children are living in stable homes** that are meeting their needs and improving their outcomes, we are impacted by the national market which is not meeting the needs of children.
- **The use of emergency unregistered and/or unregulated provision is closely monitored** to ensure they are only used when absolutely necessary. The length of such arrangement is kept to a minimum and are managed through regular review and risk management arrangements. During our Children in Care monitoring visit, it was seen that the rationale for the use of these placements was not clearly explained in the children's records. Now, senior management authorisation is captured on all records. Children in such arrangements are considered at multi-disciplinary meetings where all relevant agencies, the young people and their family are brought together regularly to ensure oversight and dynamic risk management arrangements are in place. All is being done to secure a suitable home for the young person and contingency plans are considered.
- Recent review of the procedures and pathway to the assessment of connected persons which has enabled a more fluid process. **This has resulted in improved communication between the connected persons fostering service and the social work teams.**
- **Our Quality & Outcomes Team provide effective quality assurance of unregulated and unregistered provision** and of placements where concerns have been raised (including seeking the voice of the child). They also support and encourage unregistered providers to register with Ofsted.
- **We are addressing the local impact of a national market** which is not meeting the needs of our children, and a national shortage of foster carers, with the following actions to increase access to homes that can meet the needs of our children:
 - Improved the quality of our NCT fostering agency (now judged RI) and continue to drive improvement.
 - Implemented our NCT fostering marketing and recruitment campaign including resilience, mainstream, Family Link, emergency, and short-term carers.
 - Implemented our Public Health funded project to support the mental health of children in NCT foster care which has had a positive impact on placement stability.
 - Re-opened our Fostering and Children's Homes frameworks in Summer 2022 with 11 additional providers joining.
 - Exploring options with IFAs to increase access to emergency carers.
 - Jointly reviewed the statement of purposes of homes on our block contract so they are better able to meet the needs of our children.
 - Residential homes block contract extended to include an additional out of county children's home – places will start being available from September 2022.
 - Contract for 2x new emergency Children's Homes – planning applications approved, due to be operational December 2022.
 - Work with WNC and NNC on capital funding proposals for additional inhouse residential care provision.
 - Submitted a partnership bid with Homes to Inspire to the 2022 DfE Capital funding, proposing refurbishment of a previous adult group care home to provide a home for children with mental health / behavioural needs.
 - Building stronger relationships with external providers.

- External review of placements, commissioning, and brokerage completed, and improvement actions being taken.
- Improving support to sustain placements through multi-disciplinary teams, placement stability meetings, commissioning action for children to pilot additional support to prevent external placement breakdown (expected to be operational by November 2022); recruitment of 2x FSWs to support stability of NCT foster placements.

How do we know?

- Significant improvement from 2019 inspection to Monitoring Visit in February 2021 when “*too many*” had become “*a few*” children still come into care too late or in an emergency and finding suitable placements for those children remains a challenge. However, the Monitoring Visit in July 2021 raised concerns that “*some*” cases have been subject to drift and delay as a result of the lack of focus on what positive change would look like.
- The number of children subject to pre proceedings has increased from an average of 30 families per month a year ago to an average of 40 families, an increase of 25% over the course of the year (August 2022).
- The improvements in the length of time families are within PLO have been maintained in the last year and have improved further from an average of 19 weeks in February 2022 to 16 weeks in June 2022, with the aim to still have most pre-proceedings within 12 weeks.
- Of those families where the PLO process has ended in 2022, 54% have stepped down.
- The length of care proceedings was 58.9 weeks in October 2020 (a significant rise likely due to the pandemic and unavailability of court time and experts). In January 2021, this reduced to 38.6 weeks and the current average has been consistent at 35 weeks (August 2022).
- Escalations from the court have reduced and there has been a noticeable improvement in the quality of assessments completed in pre-birth, PLO pre-proceedings and in care proceedings.
- 48% (12 children) of children the Family Solutions team have worked who were in a care placement have been able to safely return home (July 2022).
- 74 Children in Care returned home January – June 2022 compared with 48 between November 2019 – April 2020.
- Over the past 6 months, 9% of children leaving care have been adopted, comparable to the national average.
- 83.4% of children have an up-to-date care plan (YTD July 2022).
- During June 2022, IRO escalations raised regarding young people having their care plan completed with them led to an increase of co-produced plans to 65%.
- 86.9% of children had their first review on time (YTD July 2022), an improvement from 78.9% in 21/22.
- 38% increase in the number children attending their reviews in the year 21/22 in comparison to the previous year and a 27% decrease in numbers of young people who did not attend and chose not to convey their views in their review process.
- 92% of children aged 4 and above participated in their reviews, either by attending their review and / or providing views in consultation forms or through IRO and / or social worker.
- 77 young people have Mind of My Own accounts with 134 statements from young people having been received to inform visits and discussions (YTD July 2022).



Education

North Northants:

- Statutory school age PEPs compliance: 90% in 2019-2020, 97% in 2020-2021 and 97% in 2021-2022
- Statutory school age PEPs quality assured as good: 56% in 2019-2020, 64% in 2020-2021 and 79% in 2021-2022
- Early Years PEPs compliance: 82% in 2019-2020, 91% in 2020-2021 and 93% in 2021-2022.
- Early Years PEPs quality assured as good: 77% in 2019-2020, 80% in 2020-2021; 80% 2021-22
- Post 16 PEPs compliance and quality has been more variable over the last 3 years:
 - Post 16 PEPs compliance: 83% in 2019-20, 97% in 2020-21 and 76% in 2021-22
 - Post 16 PEPs quality assured as good: 72% in 2019-20, 63% in 2020-21 and 68% in 2021-22

West Northants:

- Statutory school age PEPs compliance: 90% in 2019-2020, 97% in 2020-2021 and 98% in 2021-2022.
- Statutory school age PEPs quality assured as good: 56% in 2019-2020, 64% in 2020-2021 and 79% in 2021-2022
- Post 16 PEPs compliance and quality has been more variable over the last 3 years:
 - Post 16 PEPs compliance: 83% in 2019-20, 94% in 2020-21 and 82% in 2021-22
 - Post 16 PEPs quality assured as good: 72% in 2019-20, 82% in 2020-21 and 52% in 2021-22.
- In 2018-2019, 25.9% of OC2 Northamptonshire Children in Care achieved a 9-4 pass in English and Maths, compared to 17.8% nationally. For 2019-2020 this rose to 29.2%, compared to 24.4% nationally (figures for 2022 not yet available)
- The percentage of post 16 Children in Care in Education, Employment or Training (EET) 3-year trend of improvement: 74% in 2020, 81% in 2021 and 84% in 2022.

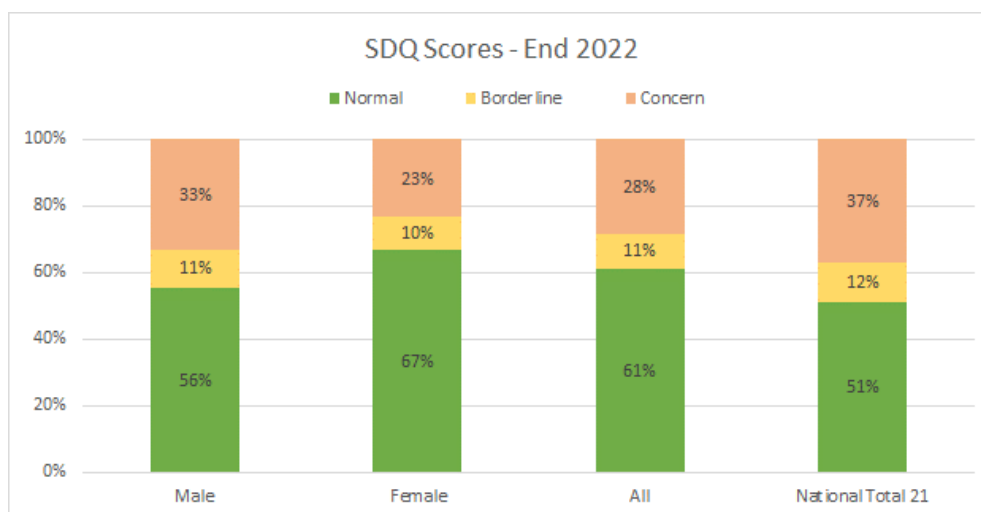
Feedback from VS holiday activities:

"The best, we love them and want more, especially stable mates and adventure ways. Leaders lots of fun. Loads new challenges and activities this year I was living my best life thank you." (child in care)

"Great opportunity for the kids to get out and do some structured activities. Our young person did struggle when first attending these sessions but has now grown in confidence and welcomes the opportunity to get out and mix with others. As carers we really are grateful to be able to have some things in the diary especially over the 6-week holiday to help keep the kids busy." (carer)

Health

- 91% of Children in Care have a completed SDQ (June 2022).

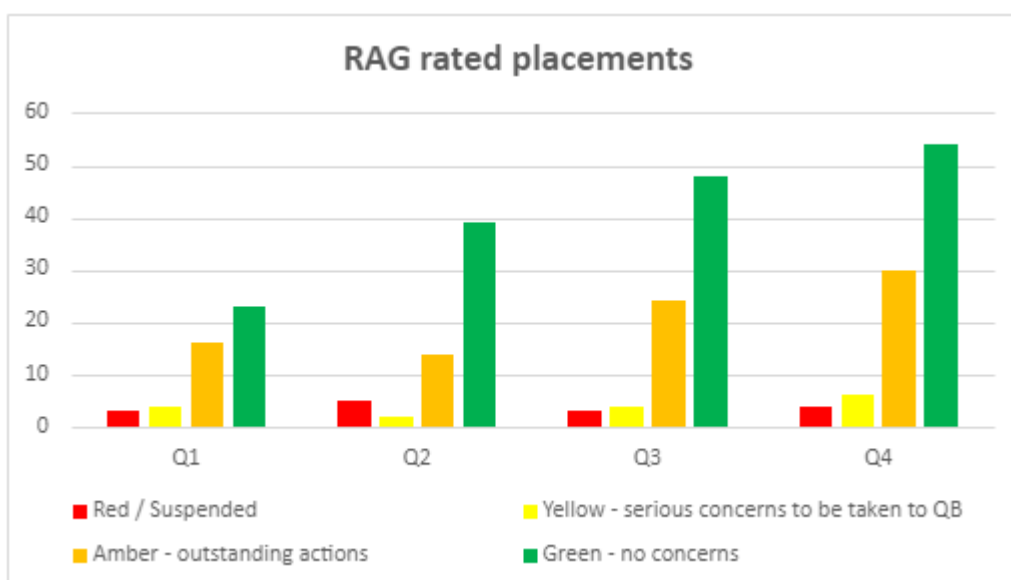


- 62.7% of children have an up-to-date dental assessment, above national and stat neighbour averages (YTD July 2022).
- 33% of Children in Care have had an Initial health assessment on time (YTD July 2022); and 68.8% have an up-to-date review health assessment, an improvement on previous 2 years but below comparators.
- NHFT's audit of IHAs has found the quality of the assessments is good.

Placements

- Proportion of Children in Care for 2.5+years in same placement for 2+years/ placed for adoption has increased from 61% in 2019 to 68.3% in 2022; our focus is on reducing the proportion of children who have had 3+ moves in the last 12 months.
- 58 children are living in 'staying put' arrangements (August 22)
- Net gain of 9 NCT fostering households over last 2 years (to August 22) despite challenges of the pandemic and national trends of carers leaving the profession.
- Of 65 children who had received therapeutic support directly/via carer at end June 2022, 6 (9%) had experienced a placement breakdown against a baseline of 30%<.
- An NCT foster carer who completed Therapeutic Parenting with clinical psychologist reported going from 70% chance that the placement would end, to 70% chance it will continue. Another said: *"Before the sessions I didn't think I would continue with fostering and now I will"*.
- To date, we have secured an additional 11 residential care beds for the sole use of NCT by the end of 2022, including in emergency/ urgent situations.
- People Too review of placements, commissioning, and brokerage (February 2022) found: *'In some areas, NCT is managing, and meeting need as effectively as comparators. Despite this, some intractable issues are present that require creative and innovative solutions.'*

'Leadership, insight, and analysis is allowing NCT to focus on the right things, with many plans in flight to address existing deficits.'



Quality and Outcomes team quality assurance of placements that are unregistered and/ or where concerns have been raised 21/22- Extract from a Quality & Outcomes visit to an unregistered placement:

'CM when I arrived you said you were happy for me to come in and complete my visit. You said you remembered me from my last visit. You told me that you had been at school today and now you were just doing your washing. You said you had had a good day at school and appeared happy. You said I could come see your room and I was amazed at how good it looked – and very bright. You said you liked your room. You showed me the pictures on the wall and told me the people in the photos were your old carers.

You told me you were saving up to buy a gaming PC and laughed at me when I didn't know what this meant. You told me you were going to use it to play fortnight. We talked about how you play on your x-box at the moment and you have 2 hours a day you can play. You said that sometimes you would like more and we talked, with N, about how well you have adhered to this time limit.

I heard you laughing and joking with your support worker and N and you were very pleased to show us all your trick for putting on your duvet cover.'

What does this mean for children and families?

- Our Children in Care are well supported by workers who care about and understand their needs and the majority achieve good outcomes.

What are we doing to further improve?

- We are **part of the Local Family Justice Board** and its subgroups which meets regularly and improves joint working between the NCT and the courts. Priorities include more robust work prior to the first hearing, strengthening processes, better pre-proceedings, more robust case preparation, shorter care duration, less hearings, and more effective hearings.
- We are also **part of a DFE regional project** which has developed a toolkit for all practitioners along the lines of the Essex toolkit but with a local focus. This has been rolled out in NCT and is part of our overall improvement work for the PLO process and for use within the pre-birth procedures.
- **Graded Care Profile 2** training for staff will support our response to chronic neglect at earlier stages. By the time children reach threshold for PLO, Graded Care Profiles could be utilised to review the impact of the support and offer the evidence for the action that needs to be taken.
- We are looking at how to **further strengthen quality of assessments** i.e., training of social workers in specialist models of assessment such as Parent Assess.

- **Improvement actions are in place** to ensure 'My Care Plans' are consistently completed with children that clearly reflect their current and future needs with clear contingency plans, are shared with children in good time before their review, and they are given the choice of how their review is held.
- **We will continue to encourage children's participation in reviews** and the use of the Mind of My Own App to record and represent their wishes and views at reviews.
- **IROs will ensure the Care Plan holistically explores and identifies each child and young person's needs**, particularly focusing on children and young people's cultural and diversity needs.
- IRO and Children in Care Service Managers will continue to **share good practice and identify areas of concern** so we can develop joint plans to address these.
- **Support and encourage IRO's to fully evidence** the direct and indirect contact they have with children and young people and their families.
- **Reduce the number of children having 3+ moves in 12 months** through increased scrutiny on placement planning and stability arrangements, including additional family support for children in NCT foster care and external placements.
- **Developing trauma informed practice** in our Children in Care teams.

Education

For the 2022/23 academic year The VS is focusing on:

- **Improving the compliance and quality of post 16 PEPs** through allocated resource of two Education Officers and an experienced Team Manager
- Addressing drift in the assessment of SEND for some children in care and the securing of special school places for children in care with an Education and Health Care Plan through **new escalation procedures**
- **Enhancing our intervention offer** for education settings to ensure they are best placed to improve the outcomes of children with a social worker.
- Developing **engagement and participation** with Children in Care.
- Supporting schools in responding to the **new exclusions guidance**: in particular, advice on what additional assessment and support needs to be put in place.
- Supporting other services in **discharging their statutory duties towards children in care** with SEND.

We will also:

- **Monitor the impact of and learning from the Prospects/ H2I** joint working to improve EET outcomes for children.
- Exploration of how care experienced young people with an EHCP may be able to **access Supported Internships available via Prospects**.

Health

- **Training and support for practitioners** to improve understanding of SDQ scores and use in care planning.
- From September 2022, dip sample children's records from different agencies to assess how comprehensively SDQ's are used (and triangulated) to **inform practice and care arrangements for young people**. Information is also utilised to better understand and support Children in Care's emotional and mental health needs.
- **Continue to work with health partners** to address and highlight the impact of delays to children's health assessments and reviews.

- **Shaw Trust are funding a new Mental Health and Well-Being Worker** (to be recruited) to provide additional support to young people at H2I homes, with the intention to improve placement stability and achievement for young people.
- **Barnardo's have been commissioned by the ICB to deliver a key worker service** for children / young people aged 0 to 25 with learning disabilities/ autism with complex needs– this includes children who are in care and those who aren't. Key workers will navigate to ensure the appropriate level of support is accessible when needed, manage crisis, and support community living. En-fold (local organisation led by people with autism) will be providing peer support and step-down support. This is expected to go live in Q4 21/22.

Placements

- Our Sufficiency Strategy is being refreshed and we continue progressing the following actions to address the shortage of suitable placements to meet children's needs:
 - Fully implement and monitor the impact of process changes in commissioning and brokerage.
 - Deliver NCT's fostering recruitment and marketing campaign to increase the net number of NCT carers that can support the differing needs of our children.
 - Further PH funding has been secured to provide therapy to <15 additional NCT foster children/ families to sustain placements; and Clinical Psychologist direct work with 10 families and 60 Social Care staff to upskill and embed trauma-informed practice. We are working with ICB to identify how this can be mainstreamed.
 - Work with external IFAs to increase access to emergency foster carers.
 - Continue to build and improve relationships with external providers.
 - Open our 2 new emergency homes by the end of 2022.
 - Work with councils to finalise capital investment in additional NCT Children's Homes.
 - Progress additional externally delivered Children's Home if successful in DfE capital bid.
 - Monitor impact of initiatives to stabilise placements.

Care Leavers

What do we know about the quality and impact of our practice?

- Russell House, our dedicated building for care leavers to drop in and attend groups provides a positive, warm, safe, and supportive space that is valued by young people and practitioners.
- Post pandemic, we have re-established our drop-in day where agencies such as DWP, Housing, Health, Education, Prospects, and CIRV are available to meet with our young people. We are also setting up a similar drop-in centre in the North.
- We were planning to celebrate our care leavers at a festival style event in September, for up to 100 of our young people; most of the performances / acts are by the young people. Unfortunately, this had to be postponed due to the Queen passing away and will be re-arranged.
- 19 of our care leavers took part in a camping trip in Summer 2022, helping to increase self-esteem, kindness, patience, teamwork, self-awareness, and confidence.
- Care Experienced Apprentices within the Leaving Care Team are supportive and creative. They also provide ideas of how to engage our young people so that we have a wider voice to help us shape the service delivery. Both are due to gain their qualifications in November, and one has already secured a permanent role in NCT (finance team).
- Positive relationships between the Separated Children's Team workers and PAs enable consistency of service for young people, particularly when they have been at point of crisis and when transitioning to leaving care services.

- Improved transitions for children into the leaving care service because of joint service events and joint supervisions.
- Since our November 2021 Monitoring Visit, young people have contributed to a survey about the Care Leavers offer and a reviewed offer has been created which is currently being prepared for publication. There will also be a version for young people.
- Financial entitlement changes have been agreed and the new policy has been rolled out within the service. This new financial policy provides a comprehensive offer to young people and guidance to staff and young people of sources of financial and other support.
- The stability of Leaving Care staff means many young people have positive enduring relationships with their personal advisors. Although at times unavoidable, we seek to limit the changes experienced by a young person. Changes in allocation arrangements has meant the 'duty' system is now able to provide a more responsive and person-centred service.
- We have continued to make further improvements in quality of pathway plans. All are reviewed by managers with clear oversight and direction given, which is then captured on the young person's record
- Young people at risk are now managed through the adult risk management arrangements with regular multi-agency team meetings to oversee and manage the risk, chaired by experienced and suitably qualified staff with important key other agencies (police, housing, adult services) routinely in attendance.
- The newly created accommodation and transitions panel allows for all agencies to refer and review young people and has been seen to have a positive impact in building brighter futures for young people.
- While there is pressure on the stock of social housing, care leavers have priority bidding status and practice has now changed to ensure housing applications are made at the earliest opportunity in line with the young person's needs. We have agreed refreshed care leavers housing protocols with WNC and NNC.
- Most young people now receive access to their records within the prescribed timescales and comprehensive chronologies are created for them. Where there is a delay, this is resolved as soon as possible.
- Through a PH funded project, 73% of Leaving Care case-working staff have fully completed Emotion Coaching training; there are 3 EC Champions and feedback shows staff are now working in this informed way: *"I found understanding how the brain develops and at what stages and how that affects behaviour extremely useful."*
- Mental Health Advanced Practitioner (MHAP) role has supported 50 young people intensively and another 50 through other approaches.
- 7/11 Tier 3 care leavers that our MHAP had supported in Q3 and Q4 of 21/22 had been helped so they **had not needed** to access NHS emergency/crisis pathways.

"you're my go to person, you have saved me from myself on so many occasions, without a doubt you're always there for me and you understand me more than anyone. you mean so so so much to me and i want you to know that. i hit the PA jackpot with you!! you're amazing at your job and never ever let any of your new cases or the ones you still have tell you otherwise. i wouldn't be half the woman i am today if it wasn't for you j, thank you so much for being you x"

Care leaver about their PA

Suitable accommodation

- Most of our care leavers are living in suitable accommodation.
- Regular meetings with housing colleagues from WNC and NNC have been effective in moving young people into accommodation where they may previously have been homeless.
- Currently (August 2022) 13 young people have been identified as no permanency address or street homeless. All are carefully monitored with services and plans in place to seek to move them to suitable accommodation if possible:
 - 10 are staying with friends or family.
 - 1 is street homeless and has been presented to the Accommodation & Transitions Panel.
 - 2 are in temporary accommodation.
- Supported accommodation, from Homes to Inspire Belinda Ferrison House, 'Training Flats' continues to support up to 21 care leavers at any one time to achieve good outcomes.
- We have secured more of this kind of supported accommodation package by commissioning YMCA, with a new property for up to 9 care leavers with additional needs due to open in Summer 2023.
- We are working with council colleagues as finding their own tenancy continues to take longer than expected for young people, and there is a back log for the housing teams following the pandemic.
- The newly created Accommodation and Transitions panel allows for all agencies to refer and review young people and has been seen to have a positive impact in building brighter futures for young people.
- Prospects also provide valuable input for young person's education or employment plans.

How do we know?

- QA activity (September 2021) found the majority of Pathway Plans reviewed have a clear exploration of the young person's needs and how they like to be supported, with the voice of the young person present in the majority even when young people are non-verbal.
- Ofsted monitoring visit (November 2021 found) *'the quality and timeliness of written pathway plans have improved since the 2019 inspection'.. 'regularly updated and written collaboratively with care leavers'.. though for 'some care leavers the plan does not address some important aspects of their lives'.*
- Most CRPDs undertaken with the service are seen to be good or better.
- 82.4% of young people have an up-to-date pathway plan (YTD July 2022) this includes 87.4.% of 18 – 21-year-olds.
- 81.4% of 18–21-year-old care leavers have been in contact with the service in the last 8 weeks (August 2022).
- 62.3% in EET (YTD July 2022) above England and stat neighbour averages.
- At the end of June 2022, 50 young adults had been intensively supported (Tiers 2-3) with their mental health and wellbeing by our MHAP and another 50 through light touch/via PA/complex case panel/open days. These young adults have had marked improvements in their range of wellbeing issues.
- 7/11 Tier 3 care leavers our MHAP had supported in Q3 and Q4 of 21/22 had been helped so they **had not needed** to access NHS emergency/crisis pathways.
- 94.7% of care leavers in suitable accommodation (YTD July 2022) which is above England and stat neighbour average.
- Ofsted monitoring visit (November 2021) found *'management oversight of care leavers who have become homeless has improved since 2019, resulting in many of their housing situations being resolved, although some inconsistencies remain'.*
- Feedback from adult's service attendees of the Accommodation and Transitions panel is that it is alerting them much earlier to young people with additional needs and also increasing awareness of the issues facing many care leavers. Alongside the need to develop priority pathways to ensure they can access the help that is needed.

- At the end of Q4, only 2 of the 19 care leavers supported at Belinda Ferrison House ‘Training Flats’ were NEET and there were zero notifiable incidents (no CSE, damage, assaults to staff, police involvement, complaints, episodes of bullying or hospital admissions).

“My time at BFH was largely positive and I received lots of support from all of the staff there especially my support worker J. From the small things such as help with shopping to the much bigger things such as support with my mental health and self-harming issues.

The fact that there is a member of staff 24/7 is also a big positive as it allows for support even in the early hours of the morning, this came as a big help to me when I had a bad incident of self-harm.

Being able to meet other young people living at BFH was also a good experience as it allowed me to mingle with others and get out to exercise and participate in some football which helped me. Workshops and activities such as cooking with the staff here was also lots of fun.

Overall, my time at BFH provided me with lots of help and support with learning how to become independent. The staff were all very friendly and welcoming and I was glad to meet everyone there.”

Initial findings from Practice Week (August/ September 2022) included:

- Leaving Care workers know their young people well, are committed to improving their lives, have good communication skills, offer a good mix of support and challenge, have a focus on outcomes, and are incredibly adept at identifying and engaging the best support services.
- The service is working pro-actively to engage with our harder to reach young people – our Care Experienced Apprentices have supported with new ideas here.
- The Voice group is highly valued by female young people; it provides safe space to have helpful, supportive conversations with skilled practitioners from Health and Social Care.
- The service is making real headway building community networks and engaging partner agencies fully in ongoing support of our young people.
- Multi agency working is a real strength – because of this young people do not have to repeat their stories several times.

My PA is always on my side

I like my worker; she speaks to me about my experience, my family and my identity

Feedback from auditor observing a joint supervision with Children in Care and leaving care

‘The young person’s views, wishes and feelings were clear; their voice had been captured and was shared well by both service areas; K facilitated this discussion well so each service areas views were heard equally. K’s clear focus on the young person, and leading in a strengths focussed way was what made this an awesome piece of work’.

What does this mean for children and families?

- Our care leavers are well supported by workers who care about and understand their needs; and the majority achieve good outcomes.

What are we doing to further improve?

- The drive for all young people to have clear, specific plans and personal advisors to be clear on the action they need to take to support our young people to succeed remains relentless. Recent changes to the team structures have given increased oversight on case work and support to staff which we expect to help achieve this.
- We would like to create a hub similar to Russell House in the North and are having discussions regarding potential properties to progress this.
- Work around transitions into adulthood being seen as part of the young person's "journey" and not a single step is important to the leaving care service. A lot of work to inform and support other service areas is underway; this is part of proactive work to formalise earlier preparation for adulthood.
- Continue to engage partner agencies to ensure networks are built in advance and to share responsibility for supporting young people as they become adults; particularly for those young people who were separated children as services that can meet their specific needs are underdeveloped and not readily available across the county.
- Working with council colleagues to identify potential properties for a 'training flats' style supported accommodation in the North.
- Further PH funding has been secured for MHAP direct work with <35 care experienced young adults and <40 frontline staff to upskill and embed trauma-informed practice and events for an additional 100 care experienced young adults; and we are working with ICB to identify how to mainstream this.
- Through the ICS we are planning a stakeholder event for businesses, services, and relevant organisations in Northamptonshire aiming to further improve the offer to our care leavers.
- We have plans to offer more group work for our young people (beyond our well-being, UASC, Football, Girls Sport, and Your Voice groups) so that young people have many and varied opportunities to engage with the service.
- Working jointly with other services, the *Preparing for Adulthood* programme is being progressed to ensure all care leavers are helped to be ready to live successfully independently.



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CORPORATE RISKS																		
CR 01	01/04/2021	Chief Executive	Long term sustainability	Stakeholder engagement - unitaries and other strategic partners Many of the KPIs are dependent on good partnership working with North Northamptonshire and West Northamptonshire and other agencies including Health (PEPS, educational outcomes, health outcomes, missing from care)	Poorly defined shared objectives Collaborative advantage for working together not clearly defined Policy changes within local authority and / or partner organisations Partnership initiative is incompatible / does not align with other local initiatives	Performance targets are not met. No strategic approach to issues of risks, costs, benefits.	2	5	10	1. Clear vision and conditions for success developed and shared with all partners and colleagues 2. Children's Trust business plan strategy with clear priorities 3. Development of strong relationships with both councils and partner organisations	1. Consultation with staff through 58 minute sessions and additional forums 2. Children's Trust strategy in development through the forums	2	5	10	Maintain strong relationships with workforce, owners and partners	2	5	10
CR 02	01/04/2021	Chief Executive	Quality of services / contractual	Service Delivery Contract: A persistent breach in the provision of the Services persisting for one or more Quarters during the term of the Agreement; Monthly KPI falls outside of Tolerance for three (3) consecutive Months; Quarterly KPI, falls of Tolerance for two (2) consecutive Quarters or more	Insufficient progress made against planned improvements and performance indicators	Step In Notice	2	4	8	1. Regular monitoring against contractual KPIs 2. Improved reporting through OCG and SCG 3. Improvements in Business Intelligence and demand forecasting	1. Baselines agreed, together with reporting templates 2. ILACS Inspection "Requires Improvement" 3. Key focus on local and national	2	4	8	1. Improved business intelligence systems. 2. Continued focus on permanent recruitment 3. Social Care Improvement Board 4. Increased workforce training	2	4	8
SOCIAL CARE RISKS																		
SCR 01	01/04/2021	Director of Children's Social Care	Quality of services / contractual	An emergency occurs that has: - a significant adverse impact on the welfare of, and there is a serious increased risk of harm to, children and/or young people in the county of Northamptonshire; or - has a material adverse effect on the Trust of the Services such that there is, or will be, a long-term increased risk of harm to children and young people in the Northamptonshire if the Trust continues to perform the Services	Business continuity failure in critical services Death or injury to a child or young person under the responsibility of the Trust, through inappropriate care or attention	Step in notice Child Safeguarding Practice Review	2	5	10	1. Regular quality assurance and audit activity along with management supervision and oversight to identify and address any risks in relation to practice	1. There are no cases currently where concerns of this type have been identified	2	5	10	N/A	2	5	10
SCR 02	01/04/2021	Director of Children's Social Care	Inspection / Regulatory	Improvements seen by Ofsted in the ILACS 2022 are not sustained or built on.	Failure to improve services for children	Failure to maintain and build on improvements results in difficulty with future recruitment and retention and have negative impact on outcomes for children, and reputational risk	2	5	10	1. Effective leadership and oversight to ensure services are operated at an effective level 2. Monthly Improvement Board to monitor progress 3. Peer review of SEF summer 2022	1. Ofsted ILACS recognised progress and NCT status is now "Requires Improvement" 2. Updated Improvement Plan currently in Draft Form including input from partners and will be	2	4	8	1. Updated improvement plan to be sent to Improvement Board	2	3	6
SCR 03	01/04/2021	Director of Children's Social Care	Service delivery	Ongoing impact of Covid-19 on service demand and related budget pressures	Insufficient apportionment of national monies to cover incurred Covid-19 related Trust costs. Additional financial pressure on the Council. Covid-19 affecting staff members / foster carers / residential homes	Service delivery constrained - reduced service provision; workforce reduction. Need to find additional funding for services. Some non-essential services may be affected.	3	5	15	1. Baseline report produced detailing Trust position as at 1st November. 2. Continuation of targeted funding for additional SW capacity, early help and fostering 3. Placement and performance monitoring in place	1. increase in pressure and complexity with particular impact on certain service areas 2. Weekly demand level report showing pressure on placements	4	4	16	Monitoring impact, potential impact on service demands post March. Additional request for additional funding through contract as part of Invest to save.	2	5	10
SCR 04	09/05/2022	Director of Children's social care	Service delivery	Increase in safeguarding referrals and complexity of need leading to an increase in numbers of children in care	impact of Covid 19 pandemic, combined with legacy of unmet needs and underdeveloped early help offer.	Impact on capacity to manage the workload and to deliver quality services potential impact on budgets and placement cost alongside complexity of young people needs to be met	3	3	9	1. early help steering group and action plan and ongoing work with the wider partnership to ensure right help at the right time and reduce escalation of needs 2. system approach to ensure appropriate levels of intervention for families 2. work on robust application of thresholds by a strong front door 3. continue to improve quality of services and ensure sustainable plans at closure	1. Increase in demand and complexity as the effects of the pandemic are more prevalent. 2. Increase in separated children and fewer children leaving care over the last year. Therefore, increase	3	4	12	ICS engagement to address system challenges Safeguarding partners working collectively on priorities, one being early help Neglect steering group to develop action plan and monitor impact	3	3	9

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SCR 05	09/05/2022	Director of Children's social care	Service delivery	Unregistered placements that are illegal	THE CARE PLANNING, PLACEMENT & CARE REVIEW (ENGLAND) (AMENDMENT) REGULATIONS 2021 came into force on 9 September 2021- demands that Looked after children under the age of 16 must be placed in foster care or a registered children's home	risk of prosecution/ judicial review/ insurance/ reputation/ Ofsted inspection unintended impact where we see regulated providers that refuse complex cases as they may negatively impact their Ofsted rating and increase in solo placements	4	5	20	Unregulated placement is made only when no other alternative is available. Decision at AD/ Director level. Checks prior and after the placement is made ensuring risks are mitigated and the needs of the young person are understood. All unregulated placements are monitored on a weekly basis by senior managers to ensure all children living in unregistered children's home placements are safe and children's needs are met, and that timely action is taking place to secure a registered placement that meets their needs or so that they can safely return home. Fortnightly reports to councils/ DCSs and ICF. Regular reporting to Ofsted is in place. We report to our Social Care Improvement Board and OCG on a monthly basis. Quality assurance in regards to this area of work in place.	Unregistered placements procedure devised to ensure consistency. Senior management oversight and regular review. Learning from Ofsted inspection has been implemented. Reporting to council and ofsted in place. Sufficiency	4	3	12	implementation of sufficiency action plan. implementation of capital investment and DfE bid. Implementation of valuing care project. Weekly meetings chaired by AD for QA and Commissioning involving services and commissioning team. Increase in quality assurance activity with focus on both compliance and outcomes	2	5	10
SCRO 6	01/04/2021	Director of Children's Social Care	Finance / service delivery	Challenges to the delivery of / withdrawal of the Troubled Families Programme	Government withdraw or significantly amends the terms of the Troubled Families Programme	Insufficient funding to sustain services funded by the Troubled Families Programme. Poor outcomes for young people. Increased costs, reputational risk.	2	4	8	1. Regular monitoring of troubled families (supporting families) attachment and PBR income	1. Attachment funding covers staffing and has been rolled forward by government for a further year to 21 / 22 2. Significant increase in successful claims for the final quarter of 20/21 financial	1	4	4	1. A/D Early Help leading a piece of work to identify where further claims are possible 2. Closer interface with Business intelligence with dedicated resource 3. funding confirmed for future years	2	2	4
SCRO 7	01/04/2021	Director of Children's Social Care	Service delivery	Non recent child sexual exploitation connected cases	Victims coming forward, police investigation and criminal charges, identification of further victims and alleged perpetrators as investigation continues and made public	Serious harm experienced by a child/ young person, reputational, financial (litigation, insurance, additional resource requirements), HR (disciplinary)	3	4	12	1. The Trust is managing the safeguarding aspects of the operation/ investigation in collaboration with safeguarding partners who together manage the communication strategy.	Police investigation completed and review of case files has also been	3	4	12	1. Once report written and publication timeline confirmed then to develop a comms plan. 2. Additional resources agreed by the council to effectively manage existing work and any new	2	4	8
SCRO 8	07/03/2023	Assistant Director CFSS & YOS	Service Delivery	YOS pending HMIP inspection.	Impact for the Children Trust if the YOS provision is considered not to be a strength.	Failure to achieve a successful outcome for inspections and decrease in positive outcomes for young people and families.	3	4	12	Regular inspection readiness Meetings Peer review undertaken Service Performance Data Clinics YJB action Plan performance monitoring QA Audit Controls - recent review of Custody support plans Data intelligence with Police and Partners to Target areas and themes. Scrutiny on Top ten re-offenders YOS Management Board, Assurance reporting, oversight and challenge.	Preparing to convene external scrutiny for inspection readiness preparing to undertake a full audit control of all policy and procedures to ensure updated and accessible to staff. Training Audit tracker Inspection folders in place Review Risk areas known	3	4	12	Continue to hold the inspection readiness meetings. Report all risks to YOS management Board NCT SLT Oversight	2	3	6
FINANCE AND OPERATIONAL RISKS																		
FOR 01	01/04/2021	Chief Executive/Director of Finance and Resources	Service delivery	Manage budget within agreed contract sum	The inability of the Trust to break even leads to a 'breach of contract' as determined within the Financial Mechanism	Step-in notice	1	5	5	1.Regular monitoring of cash flow by Director of Finance 2. Regular monitoring of budget through SLT and Trust Board	1. No current cash flow concerns 2. Transformation and efficiency reporting in place 3. Balanced Outturn position as at the 31/3/2022 subject to final	3	5	15	1. Review of Placement spend, though Joint Funding panels and procurement 2. Creation of local provision 3. Continued drive to recruit foster carers 4. Implementation of new ways of working as part of both IT and asset strategy within the trust 5. Implementation of valuing care project in 2023.	1	5	5
FOR 02	01/04/2021	Director of Finance and Resources	Finance	The risk of cuts in the budget contributions of partner agencies following central budget cuts	Partner agency reduce / withhold supporting budget	Service delivery constrained - reduced service provision; workforce reduction	2	5	10	1. Regular meetings with funding partners to ensure clear sight of any proposed budget cuts 2. Successful bid for additional funding from DfE for improvement activities £469k 3. Reviewing new grant allocations and submission of bids for 22/23 (i.e. new burdens grant)	1. Submission of contract sum for period 2023 -2025 and provisional contract sum agreed in accordance with SDC 2. Monthly detailed financial monitoring in place	3	5	15	1. Funding agreements in place for 22/23. 2. Process in place for change control in the 22/23 financial year to respond to Medium term pressures. 3. Finalising arrangements for the treatment of earmarked grants and reserves 4. Inflation pressures including pay inflation above the levels forecast in the contract sum, which will require a change control mechanism to be enacted	2	5	10

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FOR 03	01/04/2021	Director of Finance and Resources	Finance / service delivery	Increase in volume and the complexity of care required and increase in numbers of children in need of support adding to budget pressures.	Inaccurate prediction of service demand and Placement Sufficiency	Failure to achieve a successful outcome for inspections and decrease in positive outcomes for children, young people and families	3	5	15	1. Regular monitoring of cases 2. Review commissioning arrangements and benchmarking for external placements 3. Joint funding arrangements with education and CCG 4. Development of placement sufficiency strategy	1. Increased complexity of cases post Covid-19 2. Review of placement budgets and partner contributions 3. MARP panel developing, however challenges from partners as implementation of new arrangements for joint funding protocols 4. Increasing demand in	4	5	20	1. Individual pupil Monitoring systems in place re case numbers. 2. Improved placement sufficiency and planning , through capital investment 3. Trust workshop to develop placement sufficiency and the development of additional local provision 4. Review of Trust property and linking to the councils asset management strategy 5. submission of additional capital bids to develop local provision. 6. Placement modelling to inform contract sum negotiations as part of quarter 1 report , final position to be agreed on actuals. Retrospective change control to be implemented at year end .	2	5	10
FOR 04	01/09/2021	Director of Finance and Resources	Finance / service delivery	Increasing cost of commissioned services and placements as a result of uncontrollable external factors (i.e. Increased national insurance; changes in regulation; impact of Brexit and Covid on ability of providers to secure suitable workforce, failure of external placement market to meet needs)	Failure to secure services and placements to meet level of demand within budget	1. reduced service provision for children and families leading to future increase in demand 2. not able to fulfil contractual requirements 3. Cost pressure	3	4	12	1. Commissioners working with providers to address workforce related issues 2. Re-opening of frameworks to increase number of providers and reviewing commissioning options 3. Identifying alternative service delivery models to commissioned services	1. Care and support providers experiencing challenges in securing suitable workforce 2. Reviewing provider	4	4	16	1. Join additional placement frameworks 2. Improve joint commissioning with adults services 3. Bring commissioned services in house if this is viable and will achieve better value for money	2	4	8
FOR 05	01/04/2021	Director of Finance and Resources	Finance / service delivery	Inability to deliver savings plans within contract sum	There have been additional cost burdens on Children's Services as a result of Covid-19. We have also postponed some transformation projects which were set to deliver savings and efficiencies for the Council	Failure to deliver savings and transformation projects leading to pressures on the contract sum and targeting resources on improving from line service delivery.	3	5	15	1. Review of individual project delivery 2. Work with partners as a collaborative approach (i.e. CCG, housing). 3. Identify alternative savings and in year mitigations 4. Incorporate project management with SRO for each project. 5. Closer links with finance and corporate project management to establish co-dependencies	1. Continued review of budgets 2. Review benchmarking and demand forecasts 3. New monitoring and reporting system in place. 4. Workshop with WNC in December 22 to review key priorities and savings co-delivery	3	5	15	1. Impact factored into the development of the MTFs and contract sum 2. Review residual pressures impacting on 22/23 financial year 3. New monitoring and reporting system in place. 4. Workshop with WNC in December 22 to review key priorities and savings co-delivery	2	5	10
FOR 06	01/07/2021	Director of Finance and Resources	Information Governance	Data Breach. NCT processes and stores a high volume of sensitive information related to the safeguarding and protection of vulnerable children and their families. Data breaches risk the integrity and availability of this information.	Deliberate or accidental action (or inaction) by NCT as data controller or a data processor of NCT data. Access by an unauthorised third party. Sending personal data to an incorrect recipient. Computing devices containing personal data being lost or stolen. Alteration of personal data without permission. Loss of availability of personal data.	Reputational Harm. Financial penalty through ICO fines under GDPR. ICO audit and regulatory action due to reduced UK GDPR compliance. Harm or risk of harm to service users, their families, employees and 3rd parties due to data breach. Loss of systems functionality. Possible safeguarding impact to children from information loss, incorrect information recorded or inability to access data when decision making. Loss of NCT contract to deliver services.	4	5	20	1. IG Service established and DPO appointed. Data Protection and Cyber Security Essentials training is mandatory to all staff and is renewed annually. Data Protection policies and procedures are in place. Data breach reporting procedure is defined and communicated to workforce. Workforce report data breaches promptly and in line with policy. DPO report breaches meeting threshold to ICO within 72 hours deadline. . Data breach protection policies and procedures reviewed as IG BAU. The DPO and SIRO work closely with workforce and SLT to ensure a Trust wide awareness of data protection responsibilities, that training is taken up and breaches are reported to DPO. NCT data protection compliance certification for ICO place. 2. Systems Data Protection Impact: New processes, systems, working methods, project programmes, software implementation, etc., are assessed for their data protection impact. 3. Unlawful Access to NCT Systems: Third party agencies and organisations provided with access to NCT systems within a NCT SLA, Commissioned Contract, other contract type or Data Sharing Agreement (DSA) for defined usage.	08/2022. Implementation of IG Framework Action Plan on hold due to additional workload to address Leaving Care information access request backlog. 07/2022. New controls to authorise access to NCT systems and data for third-parties through an updated access request form has been completed. Trust wide communications through DPO and CEO to workforce	3	4	12	1. Permanent recruitment of IG team and level of resource to be agreed 2. Training completions to be continually monitored to ensure levels of compliance are maintained. Additional training to be put in place specific to roles and service areas across workforce; direct target of staff not completed mandatory training. 3. Implementation Development of Information Governance and Data Protection Framework action plan.	2	4	8
FOR 07	01/07/2021	Director of Finance and Resources	Information Governance	Cyber security incident or issue. NCT processes and stores a high volume of sensitive information related to the safeguarding and protection of vulnerable children and their families and its workforce through computer systems.	Cyber Attack - Security breaches or hacks of computer systems leading to data breach and loss of functionality from ransomware (malicious software) placed on systems. Successful phishing exercise, data leakage, hacking activities and insider (employee) threat. Cyber defences are not sufficiently robust because the IT environment is not maintained to the required standard of security and integrity.	Harm or risk of harm to service users, their families, employees and 3rd parties due to data breaches. Loss of systems functionality. Possible safeguarding impact to children due to inability to access information. Staff unable to make correct safeguarding decisions due to cyber security attacks.	4	3	12	1. Data Protection policies and procedures in place. 2. Data protection policies and procedures to be regularly reviewed . 3. Data Protection and Cyber Security Essentials training is mandatory to all staff and is taken up. 4. Procedure and process to report breaches meeting threshold to ICO. 5. Regular communications to workforce regarding adherence to policies and procedures. 6. Additional training and workshops offered to workforce on procedures and policy requirements.	1. Data Protection policies and procedures are in place, either NCT owned or incorporated from NCC, WNC or NNC legacy documentation. 2. Review of data protection policies and procedures incorporated into Information Governance and	2	3	6	1. Data Protection policies and procedures to be reviewed and formatted to NCT brand. 2. Information Governance and Data Protection Framework Action Plan to be completed 3. Training completions to be monitored to ensure levels of compliance are maintained. 4. Additional training to be provided.	2	2	4

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							Probability	Impact	SCORE			Probability	Impact	SCORE		Probability	Impact	SCORE
FOR 08	01/11/20	Director of Finance/SLT	Staffing	High levels of permanent staff turnover	Less consistency of practice and increased levels of agency staff	Service delivery is hindered by staff recruitment and retention issues. An over reliance on interim social workers, that impacts the overcapacity and capability to deliver. Increased financial cost of interim staff. Inconsistency for families and potential for reduced outcome achievement High caseloads due to vacancies	5	4	20	1. Push permanent recruitment 2. Effective support for staff to mitigate high levels of attrition 3. Work in partnership with OPUS and community care as part of a strategic campaign 4. Develop reputation and offer for social workers	1. Review of arrangements to introduce permanent SW staff to the organisation and consideration of an alternative provider to further improve opportunities to recruit to permanent posts. 2. A 2% pay award for roles paid at SM1 or below arranged for payment in July and backdated to 1	5	4	20	1. Ongoing regular focus on permanent recruitment - performing well in a difficult market 2. Development of a strategic recruitment partnership - microsite for recruitment in place 3. Working with community care to promote the trust and utilise networks 4. Development of communication strategies including the use of social media platforms(Linked in and Twitter). Continued focus on alternative ideas for retention. Focus on hotspots across organisation continues.	2	4	8
FOR 09	01/04/2021	Director of Finance and Resources	Contracts and Supplier resilience	Risk of weak supplier resilience	If there is a risk of weak supplier resilience, then there is the possibility of provider bankruptcies putting service continuity at risk.	A reputational risk of failing to meet the needs and expectations of our customers, members and politicians as well as legal implications for statutory services. Potentially increased costs through recommissioning are failure to identify an alternative provider	3	4	12	1. Ensure service continuity plans are in place and annually reviewed for all strategic and priority contracts. 2. Increase frequency of monitoring of the provider, and use other indicators such as share value performance to help determine risk. 3. Monitoring CreditSafe alerts if the providers financial standing changes and rating drops to below 50%, Contract Managers to Increase frequency of monitoring of the provider, and use other indicators such as share value performance to help determine risk	1. Review of all contracts and providers 2. Exposure to financial risk (post covid) organisations have been funded at budget. 3. Impact on changing demands (Transport - continuation of	2	4	8	1. Continue to review supplier resilience as part of contracts review and commissioning strategy 2. Consideration of developing strategic partnership which would provide longer term stability of commissioning arrangements 3. Consideration of inflation related increase to commissioned services in with contract sum negotiations	2	4	8
FOR 10	01/04/2021	Director of Finance and Resources	IT Infrastructure	Implementation of new children's IT system 1/4/22 - RISK updated to Procurement and Implementation of new Children's IT system	Failure to implement the new IT system aligned to support practice improvement, improved reporting and integration with other systems > failure to engage with the service	1. System does not support practice and improved decision making and efficiencies . 2. Failure to integrate with other systems	3	4	12	1. Embed best practice into new system (e.g. Signs of Safety) 2 .Ensure new system supports Ofsted Improvement Plans 3.Implementation supports Ofsted Improvement Plans. 4. Appropriate groups embedded in Trust through project but continued post programme 5. Enhance technical support and ongoing development	1. Engagement of Project lead for Children's Services 2. Governance structure proposed. 3. Revenue from NNC and WNC sought - awaiting final decision on governance arrangements	4	4	16	1. Programme board decision on future of social care information management system has defined new actions for this risk 2. Agree Capital with Council(s) to start procurement 3. Start procurement with engagement from Trust teams as required - 5/1/23 First programme board started. NNC funding approved, WNC funding due to be approved end Jan 23.	2	4	8
FOR 11	01/04/2021	Director of Finance and Resources	Service delivery	The Trust is dependent upon the Council(s) delivery of aligned services and of a number of support services	Reduced service delivery level by the Council(s) impacts the trust own performance	1. Performance targets are not met 2. Support services are not supporting the delivery of the trusts objectives	4	4	16	1. Development of KPIs that will support service delivery levels required by the Trust 2. Continued development of support services board , with focus on areas of poor performance	The Support Services Board has been in operation for 2 years and is receiving high quality monthly performance information and narrative around KPIs. The board reviews risk and issues monthly and records actions / commentary	2	4	8	1. Review potential impact on KPI's and service improvement delivery 2. Review alternative delivery models in partnership with the councils 3. A separate risk and issue register has been developed and is in place for Support Services. This enables recording of items relating to performance and affecting service delivery that are not picked up by existing KPIs 4) IT KPIs have been reviewed and agreed. 5) Transport SLA being developed following disaggregation.	1	4	4
FOR 12	01/08/2021	Director of Finance and Resources	IT on-going support	IT support for the Trust including access to systems	Failure to implement new functions in existing IT systems (e.g. CareFirst) results in NCT not being able to fulfil improvement and contractual requirements	1. Not able to support improvement plans 2. Not able to fulfil contractual requirements	3	4	12	1. Escalation with IT and also Eclipse programme board to gain buy in and support for this risk 2. Recruitment of IT relationship manager for the Trust 3. Review critical incident and business continuity	1. Escalated to IT and gained positive results. 2. New business relationship manager employed by IT and has had positive impact	3	4	12	1. CareFirst and other systems roadmap created to align with NCT priorities 2. Invest to save investment in technology to incorporate new ways of working 3. Continued engagement with IT relationship manager 4. Creation of a Trust Digital Strategy	1	4	4

Risk No	Date Raised	Risk Owner	Risk Type	Risk Description	Event	Impact	Initial Risk Score			Mitigating Action	Current Position	Current Risk			Further Management Actions	Target Residual Risk		
							Probability	Impact	SCORE			Probability	Impact	SCORE		Probability	Impact	SCORE
FOR 13	20/12/2021	Director of Finance and Resources	Property Infrastructure	The current level of repair across the properties occupied by the Trust is poor. Clarity of the working principles between the North and West with respect to rectification is causing delay and there are concerns around the availability of funding to rectify issues raised.	1. Health and Safety concerns/event 2. Poor working conditions for staff 3. Staff safety concerns 4. Ability to provide services (children's centres and children's homes)	1. Ability to provide a safe working environment for staff and customers 2. Ability to provide frontline services	4	4	16	1. Escalation to the Assistant Directors of Property (North and West) on 3rd December 2. Escalation to the Support Services Board 20th December 3. North/West to provide clarity on working arrangements as the service disaggregates, including confirmation around tracking and prioritising expenditure 4. Children's home report by Trust capturing high risk areas 5. Monthly SLA meetings to be put in place with N/W Unitaries 6. Progress to be reported to the Support Services Board 7. Trust undertook soft FM audit across sites to feed into retender of N and W contracts 8. Planned programme of works to be developed to address NCC underinvestment in properties 9. ICF tested with defining clear routes for accessing capital for both N and W - documented process with associated templates.	Following escalation to property ADs in North and West, engagement has continued to improve. Monthly operational and quarterly strategic SLA meetings are in place for the North and the West. The North and West fully disaggregated responsibilities on 31st January. The North have been responsive to queries raised and are bedding in their	2	4	8	Establish a clear working process with the North and West Unitaries for the management and prioritisation of repairs and maintenance. Ensure the North and West are reporting on all agreed KPIs and that MI information requested by the Trust is provided regularly Agree a funded planned maintenance programme across all Trust occupied buildings once Unitary budget setting process has completed (developing well) receive documented access to Capital process via the ICF for in year applications Feed specific capital projects requests into contract setting process to ensure key projects are included within Unitary capital plans Joint N/W/Trust Asset utilisation working group chaired by ICF established since Feb 23.	1	4	4
FOR 14	25/04/2022	Director of Finance and Resource / AD CFSS and YOS	Financial Risk	YOS restructure plans rely on the Police, Fire and Crime Commissioner funding support. Recently this has been withdrawn for the year 21/22 which has placed a financial shortfall on the team budget. It is imperative that OPFCC provide ongoing funding via the Unitary Authorities to support the Prevent and Diversion from offending priority.	Clear funding arrangements with the unitary authorities needs to be clarified with longer term agreements. OPFCC need a direct reporting line to one unitary authority on behalf of both councils to be able to ensure good communication and payment responsibilities agreed.	Less staffing to deliver the preventative and Diversion element of YOS priorities to reduce the number of first time offenders. YOS are already a Priority one in this area for YIB therefore this would raise ongoing concerns.	4	3	12	1. Senior Managers aware, 2. Identified Unitary Council Lead, 3. Set up regular meetings to discuss financial agreements for the future.	New Finances have been provided by MoJ to aid the early help and prevention work supported by the YOS. This will be a positive position for the YOS staffing issues and managing	1	1	2	Review current Service Plan. New recruitment drive of fixed term staff. YOS management Board oversight of priorities strengthened.	1	1	2
FOR 15	25/04/2022	Director of Finance and Resource / AD CFSS and YOS	Financial Risk	Supporting Families Changes to Outcome Framework to be implemented in October 2022, the Prescribed framework and guidance has made the reporting of successful PBR claims more challenging than previously. We will need much more partnership engagement to identify more families than last year. The changes to the framework also identifies health as a data provider which has not always been easy to achieve previously.	Data meetings with health are ongoing to ensure we can download what we need BiPi leading on Data warehouse work. Partnership engagement sessions to deliver the new framework so that everyone understands what is required going forward. Information sharing protocol understood and shared to all partners. Governance arrangements to be set out clearly to ensure priority plan delivery. Need to achieve 100% again this year for PBR	Reduced financial contribution from the DLUHC resulting in less staff employed to deliver the work. More scrutiny by DLUHC department and regional leads. More scrutiny in data performance and auditing of casework.	4	3	12	1. Senior managers aware of new Framework, 2. Steering Group aware, 3. New Governance arrangements developed. 4. Revise action plan and risk register.	1. Dates set for meetings with Health Data Leads and IS Governance 2. Police ISA for data sharing sign up. 3. New Early Help Strategic Partnership Board to oversee the SF Action Plan and EH	4	3	12	Health Lead and AD for CFSS to ensure Early Help Partnership Board hold this as a key priority. Also link with Family Hub delivery plans and ICB and place based delivery development groups for both west and North.	2	2	4
FOR 16	07/01/2022	Director of Finance and Resources	Operational risk	There is a risk that the split of DTI services between NNC and WNC Councils will impact the SLA provided from WNC DTI to NCT. This is because the capability and capacity of service from WNC DTI could be impacted by this split.	Continued dialogue with WNC Chief Information Officer to provide assurance of no impact	Currently unknown	4	3	12	1. This is being raised with the CIO for WNC 2. A formal request for reassurance that SLA and other elements of IT services provided will not be impacted by this change	1. Raised with WNC CIO (July 2022). Reassurance received 2. Council assessment March 2023 3. Continue to	4	3	12	Contractual escalation of risk if the impact threatens front line services.	2	3	6
FOR 17	10/01/2023	AD Quality Assurance & Commissioning	Operational and Financial risk	Residential Short Breaks	Councils do not agree to NCT / NCT partner organisation delivery; no other viable providers; have to continue with current provider at cost higher than budget	Risk to family breakdown and increase in children in care if service significantly changes/ withdrawn in unplanned manner; failure to meet statutory duties ;increase costs if have to continue with current provider; negative SEND inspection outcome	3	4	12	Specialist pension advice being sought; twin track planning NCT or NCT partner to deliver; project steering group in place; financial modelling	Due diligence report to be completed by end Jan 23	2	4	8	Reviewing models in other areas; consideration of what additional financial support could enable transfer to alternative provider ; options to remodel service prior to transfer	1	4	4

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Appendix K

		Last 6 Months Activity							Comparators		Target	Trend	
Measure		October	November	December	January	February	March	YTD	SN	England		20/21	21/22
Children and Family Support Services	Total families allocated to Children & Families Support Service teams	113	174	152	130	124	139	1639	n/a	n/a	n/a	n/a	1538
	Families allocated within 2 days of receipt	64%	73%	71%	65%	72%	60%	65%	n/a	n/a	n/a	n/a	71%
	Initial Family Contacts conducted	96	96	100	94	96	108	1110	n/a	n/a	n/a	n/a	971
	Total children open to CFSS at month end	1255	1294	1396	1370	1422	1496		n/a	n/a	n/a	n/a	1399
	Of which open for 9+ months	105	106	142	136	143	174		n/a	n/a	n/a	n/a	103
	Of which open for 12+ months	52	50	55	56	66	77		n/a	n/a	n/a	n/a	31
	Average weeks open per child (at month end)	19.1	17.6	17.9	18.1	18.2	18.7		n/a	n/a	n/a	n/a	20
	Average caseload per worker (at month end)	9.2	9.4	10.2	10.5	11.0	11.3		n/a	n/a	n/a	n/a	11
	Total families closed	137	126	82	122	87	89	1353	n/a	n/a	n/a	n/a	1344
	% closed as completed successfully	48%	53%	50%	58%	56%	48%	52%	n/a	n/a	n/a	n/a	47%
	Families escalated to Social Care at any point while active with CFSS	27	22	10	14	16	21	244	n/a	n/a	n/a	n/a	135
	Children escalated to CP within 12 months of CFSS EHA	5	0	3	4	0	1	23	n/a	n/a	n/a	n/a	18
	As % of total CP starts	7%	0%	4%	4%	0%	2%	3%	n/a	n/a	n/a	n/a	2.4%
	Children escalated to CIN within 12 months of CFSS EHA	10	9	2	5	0	4	78	n/a	n/a	n/a	n/a	55
As % of CIN acceptances	4.9%	3.2%	1.3%	2.8%	0.0%	1.8%	3.4%	n/a	n/a	n/a	n/a	2.5%	
Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22
Contacts and Referrals	Number of Initial contacts received by the MASH	3904	4152	3071	3617	3840	4201	46624	n/a	n/a	n/a	41323	43393
	% of contacts to referral	21%	21%	17%	18%	19%	18%	19%	n/a	n/a	n/a	25%	30%
	% of contacts to EH	11%	14%	20%	26%	23%	22%	15%	n/a	n/a	n/a	25%	14%
	% contacts NFA	68%	65%	64%	56%	58%	57%	66%	n/a	n/a	n/a	50%	56%
	Number of referrals received by the MASH (in month)	837	877	511	657	728	767	8926	n/a	n/a	n/a	11357	12959
	Rate of referrals received by the MASH per 10k (annualised)	580.3	608.0	354.3	460.5	510.3	537.7	517.1	503.0	538.0	n/a	677.0	748.7
	% of Referrals to Section 47	26.2%	24.5%	24.9%	28.6%	27.3%	25.0%	24.6%	n/a	n/a	n/a	0%	0%
	% of Referrals to Assessment Only	73.8%	75.5%	75.1%	71.4%	72.7%	75.0%	75.4%	0%	0%	0%	0%	0%
	Percentage of referrals with a previous referral within 12 months	22.7%	31.2%	29.0%	25.7%	28.3%	30.0%	29.5%	21.0%	20.0%	29.0%	31.0%	35.6%
	MASH referrals given an outcome within 48 hours (2 working days)	61.9%	61.1%	57.0%	57.0%	54.7%	51.2%	67.5%			85.0%		
Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22
Assessments	Number of assessments authorised	675	1195	798	745	718	825	9702	n/a	n/a	n/a	8728	9110
	Rate of assessments authorised per 10k (annualised)	468.0	828.5	553.2	522.2	503.3	578.3	562.0	496.0	533.0	578	500	526
	Percentage of Single Assessments authorised within 45 working days	95.7%	89.9%	88.8%	91.4%	93.0%	94.9%	93.9%	87.0%	84.0%	85%	98.2%	97.8%
	Percentage of DAAT cases visited within 5 days of referral	64.4%	47.9%	46.2%	40.7%	57.5%	51.3%	57.1%	n/a	n/a	tbc	74.0%	78.2%
	Open assessments past 45 days	5	29	35	41	14	52	52	n/a	n/a	n/a	2	7
	% of assessments ending with service involvement	41%	33%	32%	39%	32%	36%	34%	n/a	n/a	n/a	39.7%	36.6%
	% of assessments stepping down to early help or universal	27%	31%	30%	26%	31%	26%	29%	38.0%	29.0%	n/a	22.9%	24.6%
	% of assessments closing with no further action	31%	36%	38%	35%	37%	38%	36%			35.0%	34.0%	38.9%
Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22
S47's	Number of S47's authorised	318	364	304	193	301	295	3473	n/a	n/a	n/a	2436	2670
	Rate of S47's authorised per 10k (annualised)	220.5	252.4	210.8	135.3	211.0	206.8	201.2	155.0	180.0	161	136	154
	% of S47's with outcome ICPC required	37%	35%	37%	37%	29%	41%	37%	34%	34%	n/a	46%	42%
	% of S47's with outcome no further S47 action	55%	57%	57%	53%	59%	48%	54%	n/a	n/a	n/a	41%	50%
	% of S47's with outcome no further action	8%	7%	7%	9%	12%	10%	9%	n/a	n/a	n/a	11%	8%
CIN	Number of children in need (inc CP and CIC as per DfE definition)	4838	4646	4336	4333	4376	4491	4491	n/a	n/a	n/a	4223	4196
	Children in need rate (per 10,000)	279.5	268.4	250.5	253.1	255.6	262.3	262.3	299.0	334.0	335.8	282.0	242.4
	% of children in need with an up to date CIN plan	75.5%	74.8%	70.3%	75.4%	83.7%	76.5%	76.5%	n/a	n/a	90%	90.0%	86.6%
	% of children in need with an up to date CIN visit	75.3%	73.0%	71.8%	78.2%	82.0%	76.6%	76.6%	n/a	n/a	90%	80.1%	83.1%
	Number of privately fostered children	6	6	6	5	4	4	4	n/a	n/a	n/a	4	7
Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22
Child Protection	Percentage of Initial Child Protection Conferences held within 15 days of a strategy discussion being initiated	54.9%	45.9%	49.4%	9.3%	42.6%	24.3%	60.5%	84.0%	79%	81%	86.0%	82.2%
	% of ICPC's which result in a child protection plan	74.7%	63.3%	71.8%	76.6%	90.7%	62.9%	79.1%	86.0%	87%	n/a	86.0%	80.0%
	Number of children with a Child Protection Plan	672	669	666	698	678	625	625	n/a	n/a	n/a	725	591
	Children with a Child Protection Plan rate (per 10,000)	38.8	38.7	38.5	40.8	39.6	36.5	36.5	34.0	42.0	45.5	42.2	34.1
	% of children on CP plans with a visit within timescales	84.6%	88.7%	77.4%	87.5%	90.8%	89.9%	89.9%	n/a	n/a	90%	88.8%	92.2%
	Percentage of children that became the subject of a Child Protection Plan for the second or subsequent time	22.1%	40.5%	15.4%	33.3%	24.0%	21.3%	29.7%	24.0%	23.0%	20%	22.6%	27.7%
	Percentage of children with Child Protection reviews completed within timescale	96.7%	96.2%	96.8%	97.0%	98.0%	99.3%	99.3%	92.0%	89.0%	95%	94.0%	97.1%
Percentage of Child Protection Plans closed after two years or more	2.7%	0.0%	12.9%	3.2%	0.0%	6.0%	4.2%	2.0%	4.0%	3.6%	2.8%	3.7%	

Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22	
Children in Care	Number of children in care	1221	1241	1229	1233	1232	1231		n/a	n/a	n/a	1143	1185	
	Children in Care rate (per 10,000)	70.5	71.7	71.0	72.0	72.0	71.9		64.0	70.0	n/a	66.3	68.5	
	Number of Children in Care who are UASC	94	100	103	104	105	104		n/a	n/a	n/a	0.0	66.0	
	Number of children entering care	42	51	32	44	33	32	448	n/a	n/a	n/a	387.0	458.0	
	Number of children discharged from care	37	31	44	42	34	35	398	n/a	n/a	n/a	401.0	424.0	
	% of children leaving care due to permanence (Special Guardianship Order, adoption, residence order)	16%	16%	25%	10%	21%	23%	19%		31%	n/a	30%	29%	22%
	Percentage of eligible Children in Care of statutory school age with PEPs completed by the end of last term (reported May/September/January)	97.0%	97.0%	98.0%	-	-	-	-		n/a	n/a	95%	-	-
	Percentage of Initial Health Assessments completed within 28 days of becoming looked after.	82.4%	78.3%	83.7%	44.4%	84.4%	42.9%	55.4%		N/A	N/A	90%	51.9%	46.6%
	Percentage of Children in Care with an up to date dental check	74.2%	73.9%	72.5%	72.2%	73.0%	71.2%	71.2%		69.0%	70.0%	90%	40.1%	55.2%
	Percentage of Children in Care with an up to date health assessment	65.1%	66.1%	73.8%	66.8%	67.1%	66.6%	66.6%		88.0%	89.0%	93%	62.0%	63.0%
	% of Children in Care with an up to date care plan	85.0%	82.1%	80.6%	79.8%	82.2%	83.6%	83.6%		N/A	N/A	95%	93.0%	86.0%
	% of Children in Care with a visit within the last 6 weeks	87.6%	91.0%	87.4%	85.8%	92.3%	89.9%	89.9%		n/a	n/a	95%	85.0%	91.2%
	% of Children in Care with their 1st review on time	90.9%	80.0%	90.9%	57.1%	74.3%	68.2%	82.6%		n/a	n/a	tb	70.8%	78.9%
	% of Children in Care with their 2nd review on time	84.7%	88.4%	87.0%	85.7%	87.7%	88.3%	88.3%		n/a	n/a	tb	89.7%	88.0%
% of Children in Care with their subsequent review on time	93.0%	92.1%	91.6%	91.6%	91.3%	92.7%	92.7%		n/a	n/a	tb	95.4%	93.2%	
Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22	
Placements	Percentage of Children in Care with three or more placements in the previous 12 months	11.9%	11.7%	11.6%	11.0%	11.0%	11.0%	11.0%	10%	10%	10%	8.8%	12.7%	
	Children who have been in care 2.5 years or more, and of those, who have been in the same placement for 2+ years/placed for adoption (%)	68.4%	67.5%	65.1%	64.1%	65.2%	65.2%	65.2%	71%	71%	66%	63.0%	72.5%	
	% of children in care placed out of county and 20+ miles from their home	17%	18%	18%	18%	19%	20%	20%	19%	16%	17%	19.0%	18.0%	
	% of Children in Care in residential placements	11.5%	11.7%	12.0%	11.4%	12.3%	12.7%	12.7%	20.0%	17.0%	n/a	11.9%	11.9%	
	% of residential placements which are in house	9.4%	8.4%	9.6%	10.0%	11.1%	9.2%	9.2%	n/a	n/a	tb	11.0%	10.8%	
	In house residential utilisation	73.0%	73.0%	73.0%	73.0%	73.0%	73.0%	73.0%	n/a	n/a	tb	72.7%	59.1%	
	In house foster utilisation	69.2%	67.7%	68.7%	70.3%	69.0%	67.0%	67.0%	n/a	n/a	tb	86.0%	65.8%	
Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22	
Adoption	Number of adoption orders granted			7			9	30	n/a	n/a	n/a	72	38	
	The average number of days between children entering care and being placed for adoption			401.0			426.9	498.3	340	376	273	436	588	
	The average number of days between the placement order being granted and being matched (Quarterly)			102.0			144.7	120.2	152	178	178	165	184	
	Percentage of Children in Care who were placed for adoption within 12 months of an agency decision that they should be adopted (Quarterly)			85.7%			77.8%	86.7%	72.5%	74%	72%	72.9%	70.3%	
Care Leavers	Percentage of eligible Children in Care and young people with up to date Pathway Plans	85.4%	82.2%	78.7%	80.2%	83.1%	84.8%	84.8%	N/A	N/A	95%	87.8%	88.9%	
	Percentage of eligible Children in Care and young people with up to date In Touch Visits/Contact	88.5%	86.4%	85.1%	84.8%	89.1%	89.6%	89.6%	N/A	N/A	90%	79.7%	81.3%	
	% of Children in Care & Care Leavers aged 16+ with a personal advisor	84.9%	84.4%	79.4%	78.4%	79.7%	78.8%	78.8%	n/a	n/a	tb	77.6%	78.5%	
	Percentage of young people now aged 17-21 and living in suitable accommodation who were looked after when aged 16	95.4%	94.6%	93.1%	93.4%	95.6%	94.7%	94.7%	89.0%	89%	90%	91.9%	91.7%	
	Percentage of young people now aged 17-21 and in employment, education or training who were looked after when aged 16	64.2%	63.5%	62.8%	64.2%	64.5%	63.4%	63.4%	56.0%	58%	55%	58.6%	62.5%	
Measure		October	November	December	January	February	March	YTD	SN	England	Target	20/21	21/22	
Caseloads & Staffing	Workers with caseloads above the target in Assessment Teams	10	5	3	3	0	4	4	n/a	n/a	35	0	0	
	Workers with caseloads above the target in Safeguarding Teams	34	38	33	29	39	36	36	n/a	n/a	22	39	27	
	Workers with caseloads above the target in LAC Teams	5	3	4	7	7	5	5	n/a	n/a	20	1	4	
	% of qualified social workers with caseloads above target	19.2%	17.9%	15.9%	15.5%	17.8%	17.3%	17.3%	n/a	n/a	12%	16%	13.1%	
	Overall % social care posts which are vacant	15.7%	17.4%	17.1%	16.8%	15.3%	16.4%	16.4%	16%	17%	20%	19%	17%	
	Overall % social care posts filled by agency staff	18.1%	17.8%	18.6%	17.7%	18.1%	17.8%	17.8%	tb	17%	18%	18%	18%	
	Periods of absence recorded for SW staff - starting in month	49	29	29	40	24	24	348	n/a	n/a	tb	n/a	314	
	Number of SW staff that reached any sickness absence trigger in month	6	5	4	6	4	tb	4	n/a	n/a	tb	n/a	6.0	
	Open SW sickness absence cases managed by HR team (includes informal)	25	21	17	21	16	tb	16	n/a	n/a	tb	n/a	10	
	Staff Turnover Rate (All NCT)	17.4%	17.2%	17.0%	17.3%	17.5%	18.1%	18.1%	tb	18.1%	tb	15.6%	14.4%	
Number of unallocated cases (>48 hours)	14	0	0	0	0	0	0	n/a	n/a	0	0	0		

1. Executive summary – Head of Audit opinion

1.1 The role of internal audit is to provide an opinion to the Trust, through the Finance, Resources and Audit Committee, on the adequacy and effectiveness of the internal control system to ensure the achievement of the organisation’s objectives in the areas reviewed. The annual report from internal audit provides an overall opinion on the adequacy and effectiveness of the organisation’s risk management, control, and governance processes, within the scope of work undertaken by Internal Audit. The basis for forming our opinion is:

- An assessment of the range of individual opinions arising from risk-based audit assignments contained within internal audit plans that have been reported throughout the year, including services provided to the Trust by West Northamptonshire and Cambridgeshire Councils
- The relative materiality of these areas and management’s response to agreed actions
- Management investigation and response to issues raised from fraud investigations

1.2 We can provide satisfactory assurance that there is a sound system of internal control, designed to meet the Trust’s objectives, and that controls are being applied consistently.

2. Summary of Internal Audit 2022-23

2.1 This report details the work undertaken by internal audit for Northamptonshire Children’s Trust (the Trust) and provides an overview of the effectiveness of the controls in place for the full year. Internal Audit has been provided to the Trust via a service level agreement with West Northamptonshire Council (WNC) Internal Audit Service.

2.2 2022-23 was a challenging year from an audit perspective, with a large proportion of activity relating to audits initiated as part of the 2021-22 plan outstanding at the end of 2021-22. These were reviewed and delivered by BDO, an external provision partner. The 2022-23 plan was also reviewed, and 5 audits removed to prioritise impactful audits, leaving 5 audits which were delivered by the WNC audit team.

2.3 Audits relating to the 2021-22 plan which were issued as final reports in 2022-23 have had the working papers reviewed to ensure that sufficient 2022-23 evidence was covered, and they could be included in the 2022-23 opinion. The 5 audits delivered as part of the 2022-23 plan were supported by 4 audits relating to WNC services provided to the Trust. The insourcing of the WNC audit team has led to delays in the delivery of audits, and the completion of the plan has been challenging, with some audits at draft report stage at the time of this report. These have been included in the assurance rating for 2022-23. Any changes identified following this report will be reviewed and, if required, re-audited as part of the 2023-24 plan.

2.4 The assessment ratings for the audit coverage is summarised in the table 1 below, with detail for individual audit assignments provided in table 2.

Table 1: 2022/23 audit activity

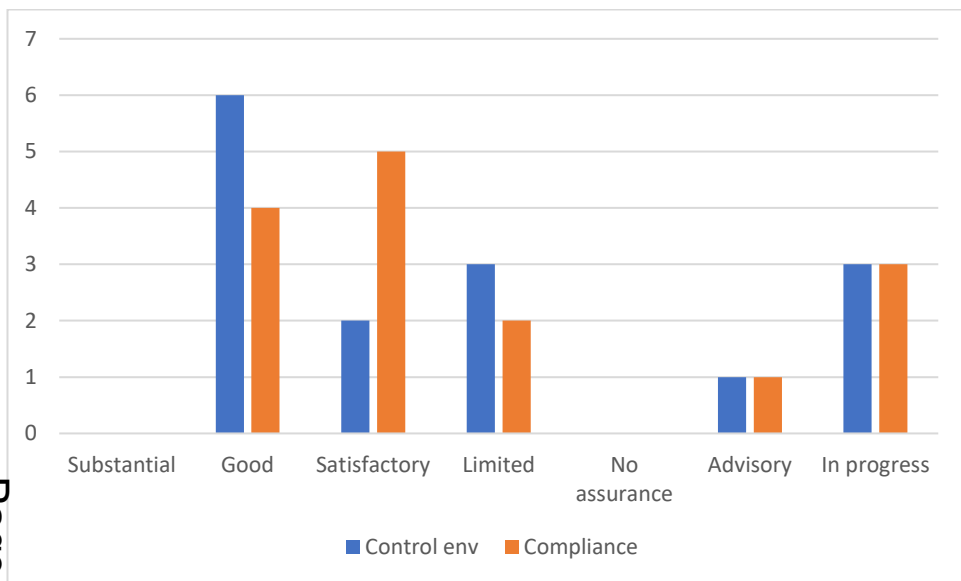


Table 2: Audit details

Assignment	Audit Status *	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
2021/22 – Plan; 2022/23 Assurance								
Services - Foster Care and Special Guardianship Payments	Final Report	Good	Good	Minor	0	0	2	<ul style="list-style-type: none"> New/ceased Foster Care and Special Guardianship Orders (SGO) payments, overpayments and one-off discretionary expenses had sufficient supporting evidence. The system design could be improved by reviewing the policies and procedures. It can further be strengthened by including who prepared the reconciliation. Policies and procedures relating to Foster Care and SGOs have not been reviewed within a timely manner or version control is missing.

Assignment	Audit Status *	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
								<ul style="list-style-type: none"> The payment run reconciliation has no information in relation to who has completed and reviewed leading to risk of lack of adequate audit trail, segregation of duties and accountability.
Services - Placement Contract Management	Final Report	Satisfactory	Satisfactory	Moderate	0	5	1	<ul style="list-style-type: none"> Evidence of a best match form and approval in line with the Scheme of Delegation. Evidence of invoice review against IPA's, sample checking of payments and evidence of final review and approval for payments. No placement review and approvals panel. No formal IPA or documentation for in-house fostering placements Processes for best match forms not completed due to the recent back log. Review of monthly placement management reports found there is no documented action plan detailing actions to be completed and expected completion dates
IT Systems Security - Carefirst System	Final Report	Limited	Satisfactory	Moderate	4	2	2	<ul style="list-style-type: none"> The system is outdated and not user friendly, which creates duplication and inefficiencies. Roles and responsibilities in relation to the system support management have not been clarified and confirmed to ensure the most effective and efficient use of resources. Current arrangements for user access are duplicated Changes to user accounts are not proactively notified by the relevant managers. Business continuity planning and back up arrangements were not documented. There are limited improvements that can be made to make the system more user friendly and compatible with the modern technology. There are easy to complete online forms. Security declaration and CareFirst training are being completed and supporting evidence is in place. There are documented data entry procedures. The system is regularly backed up and backups are checked and confirmed.
2022/23 – Plan and Assurance								

Internal Audit: Annual report and statement of assurance
2022-23

Assignment	Audit Status *	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
Overarching Safeguarding Arrangements	Final report	Good	Good	Minor	0	2	1	<ul style="list-style-type: none"> Job descriptions should be reviewed and updated as required Develop a robust system of monitoring and reporting to evidence training takes place in respect of Rapid Reviews and Children Safeguarding Practice Reviews Consider making safeguarding training mandatory for all NCT staff
Corporate Parenting – Leaving Care s24	Final report	Satisfactory	Satisfactory	Minor				<ul style="list-style-type: none"> Transition to Adulthood (Leaving Care) – Financial Policy and Guidance should be revised and approved at an appropriate level The Operational Group should be specifically tasked with investigation of the reasons for and setting up corrective action to bring Pathway Plan KPIs bank in line Management should ensure that required service improvements arising from Collaborative Reflective Practice Discussion review Practice Week have been or are being actioned
Corporate Governance Framework (incl Ofsted Improvement Plan Monitoring)	Fieldwork							50% complete
Social Work Workforce	Final report	N/A	N/A	N/A				Strategic level review <ul style="list-style-type: none"> Workforce Development Strategy demonstrates a focus on leadership, manager support of staff and initiatives for recruitment and retention Further review of how the workforce is using the strategy and how it is embedded required
Fostering Service (In-House - Independent Fostering Agency)	Fieldwork							Scope amended and agreed with management after consideration of Ofsted report. Focus on replacement content management system: development of specification and controls until new system in place 75% complete
West Northamptonshire Council provided services								
IT Disaster recovery	Complete	Limited	Limited	Moderate	0	7	0	Management action plan in place

Internal Audit: Annual report and statement of assurance
2022-23

Assignment	Audit Status *	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
IT Cyber security	Complete	Limited	Limited	Major	10	3	0	Management action plan in place
Payroll transaction testing	Complete	Good	Good	Minor	0	1	3	Management action plan in place
ERP Gold IT user access controls	Fieldwork							80% complete
Cambridgeshire Council provided services								
Accounts payable: combined shared service	Final report	Good	Good	Minor	0	0	10	<ul style="list-style-type: none"> • Good level of control over the key control processes within Accounts payable system • Good level of control over the key control processes within Accounts payable system
Debt recovery	Final report	Good	Moderate	Moderate	0	0	9	<ul style="list-style-type: none"> • Documented policies and procedures • Some improvement areas have been identified • Recovery process was generally robust • No write offs processed in ERP Gold
Income processing: combined shared service	Final report	Good	Moderate	Minor	0	0	4	<ul style="list-style-type: none"> • System controls are in place, with automatic allocation to customer and invoice accounts, or suspense accounts • Software is being replaced in 2023-24 and current controls are being maintained • Controls were largely complied with • Reconciliation discrepancies were identified
Removed audits								
Sustainability – corporate parent role	Removed							
OFSTED action plan monitoring	Removed							Combined with Corporate Governance Framework audit.
MTFP and budget management	Removed							Suggested for inclusion in 2023/24 plan

Assignment	Audit Status *	Assurance Rating			Recommendations			Key findings / Comments
		Control Environment	Compliance	Org Impact	E	I	S	
ICT – network infrastructure security	Removed							
ICT – privileged access control	Removed							

3. Audit action monitoring

3.1 Trust audit action monitoring is undertaken by the Trust and reported to the WNC Internal Audit team.

3.2 WNC service audit action monitoring is undertaken by the Internal Audit team with regular contact with service managers to ensure actions are implemented as agreed. All limited assurance audits are involved in monitoring meetings with relevant operational managers to ensure that service progress is consistent, and actions are achieved.

3.2.1 IT related audits – cyber security and disaster recovery

Regular monthly meetings are held with the Head of IT Operations. Of 20 audit recommendations there are three ‘Essential’ that remain outstanding but are in progress. A considered action plan has been developed to break down the activity so progress can be monitored against the recommendations more easily. The service area has had some unforeseen issues that has impacted on the delivery of the audit actions. Two staff members have left the Council and recruitment for replacements is underway, the operations team have been involved in several major projects and activities which were either not known or not fully defined when the original dates were set and the level of BAU has increased.

3.2.2 IT Carefirst

A meeting with the key personnel took place on 4 July 2023 to obtain an update and gain assurance to close off the audit following review of evidence supplied.