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Meeting: Planning Policy Executive Advisory Panel

Date: Wednesday 14th December, 2022

Time: 10.00 am

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

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

https://www.youtube.com/c/DemocraticServicesNorthNorthantsCouncil

To members of the Planning Policy Executive Advisory Panel

Councillor David Brackenbury (Chair), Councillor Robin Carter, Councillor Mark Dearing, Councillor Barbara Jenney, Councillor David Jenney, Councillor Anne Lee and Councillor Steven North

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

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Adele Wylie, Monitoring Officer North Northamptonshire Council

Proper Officer

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This agenda has been published by Democratic Services.

Committee Administrator: Louise Tyers

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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.

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Agenda Item 3



Planning Policy Executive Advisory Panel

At 10.00am on Monday 24 October 2022 Held in the Council Chamber, Cedar Drive, Thrapston

Present:

Members

Councillor David Brackenbury (Chair)

Councillor Robin Carter Councillor David Jenney
Councillor Barbara Jenney Councillor Anne Lee

Officers

Simon Richardson – Interim Planning Policy Lead Manager Paul Woods – Senior Planning Officer Terry Begley – Principal Local Plans Officer Louise Tyers – Senior Democratic Services Officer

Also Present

Anthony Watkins – First Renewable Developments Matthew Thomas – Michael Sparks Associates

24. Apologies for Non-Attendance

Apologies for non-attendance were received from Councillors Steven North and Kevin Thurland.

25. Members' Declarations of Interest

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

No declarations were made.

26. Minutes

RESOLVED:

The minutes of the meeting held on 26 September 2022 were approved as a correct record and signed, subject to:

Minute 21 – Planning Policy Work Programme Update

Item (ii), last sentence – amend to read "If it was felt that an SPD was...".

27. Kettering Energy Park Presentation

The Chair welcomed Anthony Watkins and Matthew Thomas to the meeting, who gave a presentation on the proposed Kettering Energy Park.

During discussion, the following principal points were noted:

- i. Members highlighted that Junction 11 of the A14 was an issue of concern and enquired whether any mitigation was proposed. Mr Watkins advised that the developers were committed to significant infrastructure costs and that this would be a fully funded development.
- ii. The developers were working with officers around occupiers' criteria for the development to ensure that it attracted the right people who would provide added value to the development.
- iii. It was highlighted that officers would need to work closely with First Renewables during the refresh of the Joint Core Strategy.
- iv. In response to a question as to whether hydrogen would be included as part of the application, Mr Watkins advised that it was expected to be part of the application, but it was not yet clear what that would look like.
- v. The developers were developing a website to ensure engagement with local people and this should be launched shortly.

The Chair thanked Mr Watkins and Mr Thomas for attending and welcomed the concept of the Energy Park.

RESOLVED:

To note the presentation.

28. Houses in Multiple Occupation

The Principal Local Plans Officer introduced the report which provided the Panel with a summary of the results of the Houses in Multiple Occupation (HMO) consultation survey and initial analysis of the feedback received.

An online consultation survey had been launched between July and September 2022 to understand the views of HMO tenants, landlords and members of the public living near to or businesses operating near to HMOs. A total of 531 responses had been received and these had provided valuable evidence to inform the ongoing investigation into HMOs.

During discussion, the following principal points were noted:

- i. It was highlighted that the issues identified with HMOs were what had been expected. It was accepted that HMOs were a necessary part of the housing mix, but it was important to develop a policy to manage them properly with regards to the problems that they caused.
- ii. The possible use of a maximum concentration was highlighted to ensure that there was a manageable percentage of HMOs in a specific area.

- iii. Car parking was highlighted as a major issue of concern and it was suggested that planning management should enforce parking standards for HMOs when considering planning applications.
- iv. It was clarified that the use of Article 4 would not ban HMOs but would require developments of a certain size to obtain planning permission. The use of Article 4 needed to be proportionate and supported by an evidence base.
- v. It was important to work with Regulatory Services to ensure that HMOs were run in accordance with their operating regulations.

RESOLVED:

To note the contents of the report.

29. Executive Forward Plan

The Executive Forward Plan for November 2022 to February 2023 was noted.

30. Close of Meeting

The Chair thanked Members, officers and the public for their attendance and closed the meeting.

The meeting closed at 12.30pm.

 Chair	
 Date	





Planning Policy Executive Advisory Panel 14 December 2022

Report Title	Proposed Modifications to the East Northamptonshire Local Plan Part 2
Report Author	Richard Palmer Planning Policy Manager richard.palmer@northnorthants.gov.uk
Relevant Executive Member	Cllr David Brackenbury – Growth and Regeneration

List of Appendices

Appendix A – Main Modifications Schedule

Appendix B - Policies Map Modifications Schedule

Appendix C – Sustainability Assessment of the Proposed Modifications

Appendix D - Additional (minor) Modifications Schedule

1. Purpose of Report

1.1. To inform Members of the Executive Advisory Panel of the proposed modifications to the East Northamptonshire Local Plan Part 2 in advance of undertaking public consultation on proposed modifications early in 2023

2. Executive Summary

- 2.1 Local Plans are prepared by local planning authorities ("LPA"), which are usually the council or national park authority for an area. North Northamptonshire Council ("the council") is the LPA for the North Northamptonshire area following local government reorganisation in 2021. It consequently became responsible for the processes commenced by the predecessor authorities.
- 2.2 East Northamptonshire Council resolved to submit the Part 2 Local Plan on 21 January 2021. Following submission in March 2021, the Secretary of State for Housing, Communities and Local Government (now the Department for Levelling Up, Housing and Communities) appointed a planning inspector to undertake an independent examination of the plan. The local plan examination process assesses whether a plan has been prepared in accordance with legal and procedural requirements, and whether it is "sound" by applying the 4 tests set out in the National Planning Policy Framework ("NPPF").
- 2.3 The council facilitated and participated in the public examination of the Local Plan which involved hearing sessions between 6 April and 5 May 2022. The outcome of the examination was a judgement by the Planning Inspector that the

- plan produced by the council is likely to be capable of being found legally compliant and sound subject to recommended modifications being made.
- 2.4 In order to progress to adoption, the council is required to publish a schedule of the proposed main modifications for consultation as recommended by the Inspector.
- 2.5 The full schedule of the proposed main modifications is set out in the appendices to this report, whilst the key issues, raised by the Inspector and requiring modification to ensure the soundness of the Plan are set out in the main body of the report.
- 2.6 Subject to the endorsement of the proposed schedule of main modifications this will be subject to consultation for a period of 6 weeks, commencing early in the new year.

3. Recommendations

3.1 That Members note the content of this report and that any comments or observations raised be taken into consideration via a delegated decision-making process, made through the Executive Member for Growth and Regeneration in consultation with the Executive Director for Place & Economy, to progress the main modifications to consultation.

Reason for Recommendation

3.2 To provide Member input into the preparation of the main modifications schedule of proposed changes to the East Northamptonshire Local Plan Part 2 and to agree, through a delegated decision, the undertaking of a statutory public consultation on the proposed modifications to allow the Plan to progress to adoption.

4. Report Background

- 4.1 The East Northamptonshire Local Plan Part 2 was approved for statutory public consultation (Regulation 19) and its subsequent submission to the Secretary of State at the meeting of the former East Northamptonshire Council Planning Policy Committee held on 21 January 2021. Following the conclusion of the consultation period the Local Plan, together with the submitted representations were then in March 2021 submitted to the Secretary of State for examination.
- 4.2 A public examination of the Local Plan, conducted by an independent Government appointed Inspector, commenced on 6 April 2022, and the hearing sessions completed on 5 May 2022.
- 4.3 This process followed the legislative requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, requiring the council to 'submit' its Local Plan for examination. The 'submitted' document must be the same version of the Plan that was consulted upon prior to its submission. In other words, the council is not permitted to make further changes to the Local Plan following the Regulation 19 consultation, and all the

- representations made at Regulation 19 are considered by the Inspector through the examination.
- 4.4 However, to ensure the "soundness" of the Plan Sections 20 and 23 of the Planning and Compulsory Purchase Act 2004 (as amended) makes provision for "modifications" to be made to a submitted Local Plan before its adoption. (The modifications effectively arise from the Regulation 19 representations, discussions at the examination hearing sessions and requests from the Inspector's subsequent action points).
- 4.5 There are two categories of modifications to a Plan, termed main and additional modifications, with the latter addressing minor alterations such as factual updates and typographical errors.
- 4.6 Only the Inspector can recommend main modifications, though in reality these recommendations constitute requirements, proposed to ensure the submitted Plan can be found sound and subsequently adopted. A council, however, must ask the Inspector to recommend such main modifications and that request was made prior to the commencement of the Local Plan examination, knowing that the Plan would require main modifications to be made to it.
- 4.7 Many of the main modifications arising from the examination have resulted from suggestions made by officers to the Inspector, setting out how policies could be revised, responding to issues arising during the hearing sessions of the examination, to ensure they are clear and sound in what they propose.
- 4.8 A schedule of the main modifications is set out at Appendix A to this report, based on discussions with the Inspector. Whilst these are suggested main modifications following the public hearings, it is recognised that these are necessary to ensure that the Plan is found sound through its examination.
- 4.9 The main modifications schedule is accompanied by a schedule of proposed changes to the Polices Map Appendix B and an addendum to the Local Plan Sustainability Appraisal, which has assessed the impact of the revised policy modifications Appendix C.
- 4.10 The addendum to the Sustainability Appraisal concluded that several of the modifications resulted in slight improvements or slight reductions to positive impacts but these did not significantly alter the findings of the SA. The most significant change related to the deletion of Policy EN17, which related to the new specialist school at Chelveston Road, Higham Ferrers, this is now complete, (hence the deletion of the policy) However, the SA addendum noted that, while the predicted effects of the plan have reduced from significant positive effect in relation to economy, education and skills to minor positive effects, as this site has now been delivered the outcomes for communities will be similar.
- 4.11 The modifications are being brought to the attention of this Advisory Panel for information and are to be agreed through a delegated decision-making process via the Executive Member for Growth and Regeneration in consultation with the Executive Director for Place & Economy, which will then allow the modifications to be published for consultation early in the new year.

- 4.12 Responses made to this consultation will then be forwarded to the Inspector to enable her to produce her final report on the examination. It should be made clear that this consultation is only concerned with the proposed main modifications identified to make the Local Plan 'sound' and is not a consultation on the Local Plan as a whole. Consultation on the proposed main modifications, and the proposed Policies Map modifications, together with the accompanying Sustainability Appraisal will run for a statutory 6-week period.
- 4.13 Following consultation, the Inspector will consider the attached main modifications along with any representations made and will then determine the final list of main modifications which are necessary to make the Local Plan 'sound', and therefore adoptable. It is anticipated that the receipt of the Inspector's final report will provide the council with the opportunity to adopt the Local Plan.
- 4.14 In addition to the above, legislation also allows the council to prepare a schedule of 'additional (minor) modifications' and include such modifications in the final Local Plan which it adopts. These minor modifications are not considered or approved by the Inspector, and do not require consultation.
- 4.15 Additional modifications must not materially affect the policies that are set out in the Local Plan. It is however, completely at the discretion of the council to prepare a list of 'minor modifications', and to take responsibility for ensuring that such modifications are indeed 'minor' (i.e. do not materially affect the policies). In practice, 'minor modifications' tend to be very minor indeed relating to typographical errors, factual updates and presentational improvements for example.
- 4.16 A schedule of the additional modifications is attached to this report (Appendix D). Again, a decision to endorse the additional modifications will be delegated to the Executive Member for Growth and Regeneration in consultation with the Executive Director for Place & Economy.
- 4.17 There are 91 main modifications proposed to the Local Plan, which affect a significant number of the Plan's policies, as well as parts of the supporting text. However, many of the modifications provide a strengthening or clarity in the policy approach, rather than a change in policy direction. Key issues to be addressed that were raised by the Inspector, requiring modification to ensure the soundness of the Plan, can be set out as follows:
 - a) The spatial development policies EN1-4 have been re-written to provide greater clarity as to how development proposals will be assessed across the various settlements of the former East Northamptonshire area. The Plan advocates a clear settlement hierarchy through Policy EN1 and recognises the ability for larger villages to contribute to the council's future housing land supply.
 - b) Policy EN2 has similarly been re-written to consolidate, the Submission Plan policies EN2, 3 and 4. This sets out the policy direction for assessing development proposals in and around villages to inform where there may be deemed appropriate locations for delivering sustainable growth.

- c) Policy EN2 is also supplemented by a proposed new paragraph of text (MM8 in Appendix A refers) which helps to define how the built-up area of a settlement is defined.
- d) Policies EN10 (Enhancement and provision of open space) and EN11 (Enhancement and provision of sport and recreation) have been revised to provide greater clarity on the approach to future requirements. (MM21-23, Appendix A refers). This sets out proposed changes to the supporting text and both policies, recognising the need to provide Supplementary Planning Documents (SPDs) to give a more detailed guide to calculating open space, sports and recreation facilities provision, and to inform developer contributions alongside longer term management and maintenance agreements.
- e) In respect of Policy EN29 (Wheelchair accessible housing) it is recognised through the proposed policy revision that the requirement for wheelchair accessible housing can only be required for dwellings where the council is responsible for allocating or nominating a person to live in that dwelling, rather than that being applied to 5% of all new dwellings, targets will however continue to apply on all qualifying sites.
- f) Policy EN32, in relation to Self and Custom Build housing, proposes a detailed change to reduce the marketing period for such proposals from 12 to 6 months, based on discussions at the hearing sessions and recommendations of the Inspector.
- g) Policy EN33 (Rushden East SUE) requires a significant revision in response to the Inspector's recommendations. Effectively, the policy has been rewritten to incorporate the key delivery principles for the development, which were previously set out in the Masterplan Framework Document (MFD) that was appended to the Local Plan (MM65, Appendix A refers). The Inspector also recommended that the MFD contained too much detail for a Local Plan, and that its "revised version" should be decoupled from the Plan and progressed as a separate document. It is proposed that could take the form of an SPD, which would require separate consultation to adopt, to ensure its future status in guiding planning applications for the delivery of the SUE was clear.
- h) Policy EN40 (Former Rushden and Diamonds site), there is a requirement to recognise the need to provide mitigation for the loss of playing pitches and ancillary facilities in the proposed modification to the policy to meet an objection raised by Sport England (MM76, Appendix A addresses this through an additional criterion to the policy).

Next Steps

- 4.18 Once an endorsement of the recommendations made by the Inspector has been agreed, officers will prepare the schedule of proposed modifications to be published for a statutory 6-week period of consultation to take place early in 2023.
- 4.19 Any representations received will be sent to the Inspector to enable her to consider the responses to the consultation, and provide the council with her final

report which will be reported back to the Advisory Panel in due course in order to progress the East Northamptonshire Local Plan Part 2 to adoption.

5. Issues and Choices

5.1 Following the completion of the hearing sessions of the Local Plan the council now has the opportunity to make modifications to the Plan in line with the Inspector's recommendations, as set out through sections 20 and 23 of the Planning and Compulsory Purchase Act 2004 (as amended), which makes provision for "modifications" to be made to a Local Plan from the Submitted Plan before it is adopted. These are modifications which are necessary to make the Submitted Plan sound and therefore enable it to be adopted by the council.

5.2 The council can now either:

- Endorse the schedule of proposed modifications to be published for consultation or;
- Resolve not to endorse the proposed schedule of modifications
- 5.3 Endorsement of the proposed schedule of modifications in line with the recommendations of the Inspector would help to ensure that the Plan would progress to adoption and is likely to be capable of being found legally compliant and sound.
- 5.4 If the proposed schedule of modifications isn't agreed in line with the recommendations of the report, this would put at risk the delivery of the key policies and developments contained within the Plan. It would also result in there being an incomplete and out of date local planning policy framework to guide future development decisions in the East Northamptonshire area.

6. Implications (including financial implications)

6.1 Resources and Financial

6.1.1 There are no significant resources or financial implications arising from the proposals. The costs associated with the production of the East Northamptonshire Local Plan Part 2 are provided through the East Northamptonshire Area Planning Policy budget. The remaining steps needed to adopt the Part 2 Local Plan can be financed from this budget. Thereafter, there will be no ongoing cost to the Council from the adoption of the Local Plan.

6.2 Legal

6.2.1 There are no direct legal implications arising from this report, other than the statutory requirements for producing 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.

6.3 **Risk**

- 6.3.1 The greatest risk is that progression towards the adoption of the Part 2 Local Plan for East Northamptonshire is challenged through the consultation process to the modifications. 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 post hearings letter which states that "overall, at this stage of the Examination, I consider that, subject to main modifications, the Plan is likely to be capable of being found legally compliant and sound"
- 6.3.2 To help mitigate any risk, the preparation of the Plan has followed a robust process which should minimise the grounds for challenge. Further, the Council has relied upon specialist legal advice throughout the process to ensure that the prospect of successful challenge is minimised.

6.4 Consultation

6.4.1 The Council has complied with its obligations to undertake appropriate consultation at all points in the development of this plan in line with legislative requirements, including those requirements set out in the council's Statement of Community involvement.

6.5 Consideration by Scrutiny

6.5.1 Not required at this stage in the process.

6.6 Climate Impact

6.6.1 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.

6.7 **Community Impact**

6.7.1 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 permissions by ensuring that planning policies reflect both national guidance and reflect local aspirations.

7. Background Papers

7.1 The council's website provides an examination page which contains the latest information and evidence base supporting the Local Plan.

https://www.eastnorthamptonshire.gov.uk/info/200193/adopted_local_plan/65/developme nt_plan_documents/15

Appendix A

Schedule of Proposed Main Modifications to the Submission Local Plan

Part 2 Local Plan

October 2022



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.

Ref No.	Para/	Public	Proposed Change	Reason for
	Policy/	ation		Change
	Figure/T	Plan		
	able/Ma	Page		
	p ref			

Introduction

MM1	Para 1.23	18	Amend text to para 1.23 as follows:	For greater clarity
			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".	(Action Point 1)
MM2	Para 1.46 and	23	Amend paragraphs 1.46 and 1.47 as follows:	To address comments
	1.47		1.46 Areas of land located beyond t∓he Upper Nene Valley Gravel Pits SPA/ Ramsar site	from Natural
			may also be important ecologically in supporting populations for which the SPA has	England (Reps
			been designated, these areas are defined as is also adjoined by Functionally Linked Land	48/13 and
			(FLL) ²² . FLL is adjacent or nearby land that lies outside the statutory designated SPA/	48/16)
			Ramsar area, but which in practical terms should be treated as if it forms an integral part of	
			the SPA/ Ramsar site. For example, iln 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. <u>FLL</u>	
			has been considered through the HRA undertaken to support the Plan.	
			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.

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.

Add new paragraph as follows:

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.

Area Portrait

MM3	Paras	29	Amend paragraph 2.10 and 2.11 as follows:	Factual
	2.10 and			Update
	2.11		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.	

¹ https://www.east-northamptonshire.gov.uk/downloads/file/11094/emaqn_aq_and_planning_developer_guide_-_july_2018

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). Following the examination of the Plan it was agreed that the MFD would be taken forward as a Supplementary Planning Document supporting Policy EN33.	

Spatial Development Strategy

MM4	Para 4.14	51	Amend paragraph 4.14 as follows: 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.	To reflect changes to the spatial policies.
MM5	Para 4.29	56	Amend paragraph 4.29 to reflect changes proposed to policy EN1 as follows: Policy Policies EN1 and EN2 (below) explains how the spatial development strategy should apply. The policies It provides additional district-level direction to support the development management process or provides further strategic direction for the preparation of neighbourhood plans.	To reflect changes to the spatial policies.
MM6	Policy EN1	56	Amend Policy EN1-as follows:	

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

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) along with local considerations for assessing development proposals set out below and through Policy EN2 and the supporting text. 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.

Hearings outcome

Action Point 12

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

Hearings outcome Action Points 13,14, 15

- 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 (Policy EN28). 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 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.
- c) Oundle At Oundle, Ddevelopment will be directed towards delivering the outstanding allocations, Further development proposals, 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), 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.

To address comments from Francis Jackson

Homes (Rep 21/01 Freestanding Villages 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 communitybased 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 Development beyond the extent of the built-up area will be resisted, unless promoted allocated through a Neighbourhood Plan. 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. 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. 5 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 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

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.

			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. 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.	
MM7	Para 4.31	58	Amend the sub heading to this section of text at para 4.31 Settlement boundaries- differentiating between built up areas and the countryside Defining Built-up areas	To reflect changes to the spatial policies.
MM8	Para 4.35	59	Amend paragraph 4.35 as follows: 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 settlement boundary criteria in together with the supporting text to Policy EN2 provide more detailed criteria to support those in the Joint Core Strategy Add the following as new supporting text after para 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. 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	To reflect changes to the spatial policies.

			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. 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.	
MM9	Policy EN2	59	Policy EN2 is deleted in its entirety and replaced with the following policy: Policy EN2 Settlement boundary criteria -urban areas 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: a) Small in scale, relative to an otherwise built up frontage; b) Well related to the urban area (existing or committed); c) Clearly distinct from the countryside physically and visually; d) Bounded by compatible development (existing or committed); 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); f) Unlikely to be of any beneficial use as open land, including for agriculture, or; g) Committed for development by way of an extant planning permission or development plan allocation.	To reflect changes to the spatial policies.

			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;	
			(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:	
			(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.	
MM10	Para 4.39 and 4.40	60	Amend para 4.39 as follows: At the freestanding villages, new residential infill development should occur within the existing built up areas, as defined by the Policy EN3 criteria (below) EN2 and the supporting text.	To reflect changes to the spatial policies.

MM11	Policy EN3	60-61	These criteria should be applied in managing small-scale and/or-residential infilling at the periphery of villages. <u>future development proposals</u> . 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. Delete para 4.40 in its entirety: 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. Delete Policy EN3 in its entirety: Policy EN3 Settlement boundary criteria- freestanding villages (Table5) 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: 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 excluded: 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 excluded: c) public open spaces on the edge of villages are excluded: d) residential curtilages, where these are bounded by existing built curtilages on fewer than two sides, are excluded: 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 included.	To reflect changes to the spatial policies.
MM12	Paras 4.41- 4.43	61	Delete paras 4.41-4.43 in their entirety 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	To reflect changes to the spatial policies.

			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. 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: Lower Crow Hill (Addington Road, Irthlingborough); and Brooks Road, Raunds. 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.	
MM13	Policy EN4	61	Policy EN4 Settlement boundary criteria- ribbon developments 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; a) is bounded by existing built curtilages on at least two sides; b) has a frontage to the highway and a depth similar to adjoining residential curtilages c) does not extend the built form away from the main highway to create a "backland" form of development; and d) has regard to positive local character and distinctiveness.	To reflect changes to the spatial policies.
MM14	Policy EN5	63	Amend Policy EN5 as follows:	To reflect changes to the

			Policy EN5 <u>3</u> Development on the periphery of settlements with a defined settlement boundary and rural exceptions housing	spatial policies.
			Beyond the <u>extent of the built up area</u> defined settlement boundaries, as defined <u>in the supporting text to by policies</u> <u>Policy</u> 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, <u>proposals for</u> rural diversification, the re-use or conversion of rural buildings, or rural exceptions housing schemes will be supported ⁶ . where it fulfils the relevant development plan policies.	
			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:	
			 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	
MM15	Policy	64	Amend Policy EN6 as follows:	To reflect
	EN6		Policy EN6 4 Replacement Dwellings in the Open Countryside	changes to the spatial policies.
			Proposals for new build replacement dwellings in the countryside will be	

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.**

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 seen 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 to 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	(e)Hearings
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	Action Point 22
character area, taking into account any wider impact of the development in its general location.	(f)Hearings
Conditions or unilatoral undertakings will should be used to ensure the demolition and	Action Point 23
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.	
	Hearings Action Point 24

Natural Capital

MM16	Supporti ng text to	68 - 70	Amend second sentence of paragraph 5.12 as follows:	Hearing Action Points 142,
	Policy EN7		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 1000m ² for commercial	146, 147, 150
	Para		schemes, is set (Policy EN7, below) to enable developer contributions towards the local GI and Greenway.	

5.12 &		
Figure 7	Add two new paragraphs after paragraph 5.12 as follows:	
	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.	
	When determining contributions towards CL consideration needs be given to the	
	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.	
	Amend the Figure 7: Priority Green Infrastructure Corridors Legend as follows:	
	NewSuggested Local GI Corridors	
	Amend final sentence of paragraph 5.14 as follows	
	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. 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.	
MM17	Policy EN7	70	Amend EN7 Policy title as follows:	Hearings Action Point
			Policy EN7: Local Green Infrastructure corridors	141, 142, 143, 144, 145, 146
			Amend Policy EN7 as follows:	
			<u>Local</u> Green Infrastructure corridors are identified on the Policies Map <u>and Figure 7</u> . These <u>local</u> corridors will be protected and enhanced <u>bythrough development proposals</u> . <u>Development proposals will be expected to</u> :	
			 a) Ensur<u>eing</u> 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>; 	
			 Ensur<u>eing, 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</u> <u>proposed</u> Green Infrastructure network; and 	
			d) Requiring sites of 10 dwellings or more (or 0.5ha or more) and commercial sites or 1000m² or more to make on-site provision and/ or pProvideing 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 <u>local</u> 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	
MM18	Supporti ng text to Policy EN8 Paras 5.15 – 5.17 & Figure 8	71-73	Amend para 5.15 second sentence as follows: 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. Add new paragraph after paragraph 5.17 as follows: 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. Remove Unsuitable Greenway Routes from Figure 8: The Greenway and amend the Legend as follows: Unsuitable Greenway Routes	To address comment by British Horse Society (Rep 34/01) Hearing Action Points 149, 151, 153
MM19	Policy EN8	74	Amend Policy EN8 and delete footnote 62, add the text from the footnote to the end of the policy and amend as follows: The Greenway <u>routes</u> , <u>both existing and proposed</u> , as identified on the Policies Map <u>and figure 8 above</u> , <u>comprise</u> a priority Green Infrastructure project for the Council, requiring	To address Historic England comments.

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.

(Rep. 39/03 and SOCG)

Development should: therefore

- **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-;</u> and
- c. on residential developments of 10 or more dwellings (or sites more than 0.5ha) and commercial sites or 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.

For greater clarity Hearing Action Point 152, 153, 155

The aim will be to provide fully integrated connections along the Nene Valley; linking Wellingborough, Peterborough and <u>the Rockingham Forest</u>. This will be achieved via development or through mechanisms such as developer contributions⁶² and additional funding streams where appropriate.

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. Developers should work with the Council to determine the most appropriate future maintenance arrangements.

<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

MM20	Policy EN9	75	Amend Policy EN9 as follows: Policy EN9: 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:	Hearing Action Points 157, 158, 159, 160
			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>	
			 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 iii) Recreational importance iv) Tranquillity, or v) biodiversity; and vi) beauty; and c) The gross area of the site does not exceed 0.5 ha or 10% of the should be proportionate to the existing main built up area of the settlement, whichever is larger. and not an extensive tract of land. 	
MM21	Para 5.25 - 5.31	76 - 78	Amend Para 5.25 amend second to last sentence and delete the last sentence (including footnote 65) as follows: 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 or any subsequent updates). The KKP study should also be utilised in conjunction with other targeted investment strategies such as the Local Football Facility Plan (March 2020). Amend paragraph 5.30 as follows:	To address Sport England comments. (Rep. 20/01) To address issues raised by Bellway Homes (Rep 26/02)

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 0.35 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 wWhere 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.

Hearing Action Points 163, 164, 165, 166

Amend paragraph 5.31 as follows:

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 through Policy EN33 and informed by 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).

Add two new paragraphs after paragraph 5.31 as follows:

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.

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.

Amend footnote 69 as follows:

			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.	
MM22	Policy EN10	79	With the exception of the Rushden East Sustainable Urban Extension, <u>aAII</u> 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. 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 insufficient access to existing open space <u>identified</u> within the local area⁷⁰. 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):</u>	To address Bellway Homes comment. (Rep. 26/02 and SOCG) Hearing Action Points 161, 162, 167, 168
			 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 EN33, via the Masterplan Framework Document for that development (Appendix 6). 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. 	

		secured. This relevant Town/should work management and Delete footnote	will be delive Parish Counci with the Counci and maintenan 70 as follows:	red by way of either a l, or the setting up of a uncil to determine to ce arrangements.	of all new open space adoption of the open someone management company. The most appropriate sponsibilities of Town and the sees	pace by the Developers long term	
MM23	Supporti ng text to Policy EN11 paras 5.32 to 5.36	Councils for maintaining their stock of public open spaces Add new sub heading above paragraph 5.32 as follows: Sport and Recreation Delete figure 9, footnote 71 and heading as follows: Figure 9: Playing Pitch Strategy and Action Plan – North and South areas ⁷² Footnote 71: KKP Playing Pitch Assessment, Figure 1.1 Delete Table 9 as follows:					Hearing Action Points 169, 170, 173
		Table 9: Pla Type of facility Football (grass pitches)	Analysis area	Current demand shortfall 1.5 youth (11v11) match sessions 1.5 youth (9v9)	Future demand shortfall 0.5 adult match sessions 2.5 youth (11v11)	Total demand 0.25 adult pitches 2 youth	
		pitoriooy		match sessions	match sessions 2.5 youth (9v9) match sessions	(11v11) pitches	

				2 youth
				(9v9)
				pitches
	South	2.5 adult match	4 adult match	3.25 adult
		sessions	sessions	pitches
		1 youth (11v11)	5 youth (11v11)	3 youth
		match sessions	match sessions	(11v11)
		0.5 youth (9v9)	4.5 youth (9v9)	pitches
		match sessions	match sessions	2.5 youth
				(9v9)
				pitches
Football (3G	North	One 3G pitch	-	One 3G
AGPs)				pitch
	South	Demand being met	-	-
Rugby	North	4.5 senior match	-	2.25
pitches		sessions		senior
		3 mini match		pitches
		sessions		1.5 mini
				pitches
	South	5 senior match	-	2.5 senior
		sessions		pitches
∃ockey (sand AGPs)	Districtwide	Demand being met	-	-
Cricket	North	Demand being met	-	-
oitches	South	2 match sessions	5 match sessions	3.5
				pitches
Tennis	Districtwide	Demand being met	-	-
courts				
Bowling	Districtwide	Demand being met	-	-
greens				

			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 enhancement of sport and recreation facilities playing pitches or make provision for these on site. Add new paragraph after 5.36 as follows: 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.	
MM24	Policy EN11	84	Amend Policy EN11 as follows:	Hearing Action Points 171, 172, 173, 174, 175, 176

For aAII 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, contributions to enhance the quality and value of existing sports and recreation facilities playing pitches within the locality and/or create new facilities to meet needs arising from the development. 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, most up-to-date evidence base.

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.

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.

Playing pitches, sports or recreational facilities will be provided for strategic development, in accordance with the accessibility standards set out in Table 7 (above).

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.

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>

Delete footnote 73 as follows:

Strategic development sites are defined in the Joint Core Strategy as developments of 500 or more dwellings/ 5ha or more of employment uses

Social Capital

MM25	Paras 6.10- 6.11	87	Amend para 6.10 (6 th bullet point), as follows: 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. Amend paragraph 6.11 as follows:	To address comments by the National Trust (Rep 27/01) and British Horse Society (Rep 34/03)
			A range of good practice exists in regard to designing for good health and wellbeing. Three documents are cited as particularly useful references ⁷⁵ . 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	To address comments from Natural

			applications/ proposals to be prepared in line with the latest EMAQN guidance [link to document already provided at section 1].	England (Rep 48/15)
MM26	EN12	88	Amend Policy EN12 as follows:	Hearings Action Points
			Policy EN12: Health and wellbeing	122, 123, 124, 125, 126, 127
			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:	120, 120, 121
			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;	
			b) Creating a distinctive, high quality and accessible public realm which promotes and encourages physical activity and social engagement;	
			c) Giving due consideration <u>Having regard</u> 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 in-the design process, for example, through pre-application advice, to ensure that the issues identified can be addressed or incorporated into the design proposals, in accordance	
			with 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 ⁷⁸ . In line with the Northamptonshire Planning and Health Protocol, all major development proposals (Development of 10 or more homes (or with a site area of 0.5 ha) or for non-residential development of 1000m ² or more) will need to	
			be accompanied by an appropriate HIA.	
			Delete footnote 78 as follows:	

			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	Amend Policy EN13 as follows:	Hearings Action Points
			Policy EN13: Design of Buildings/ Extensions	128, 129, 130 131
			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 <u>proportionate to the</u> <u>scale of the unitof an adequate size for the property</u> and space for waste management to serve the needs of all end users;	
			f) In the case of Houses in Multiple Occupation, complies have regard to 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</u> with National Space Standards as referred to in Criterion (b) of Policy 30 of the Joint Core Strategy; <u>and</u>	To address
			h) Includes parking provision in line with the Countywide parking standards and, where appropriate, incorporates changing points for electric vehicles; and where appropriate, incorporates changing charging points for electric vehicles; and	Bellway comment (Rep. 26/03

		i) Does not result in unacceptable problems of significant harm arising from light pollution.	SOCG)
MM28 Policy EN14	93	Amend Policy EN14 as follows: 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. 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. 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: 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. 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 of 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 d) conserves, protects and enhances heritage assets that are considered to be at risk.	Hearings Action Points 132, 133, 135 To address Historic England's concerns. (Rep 39/04 SOCG)

MM29	Para 6.33 and Table 10	94	preparing local lists. This is su types of building, sites and str heritage assets, thereby settir not necessary for an asset to	y, Policy EN15 (below) sets out further guiding principles for apported by Table 10 (below), which and provides clarity on the ructures that the Council considers to be non-designated as a local blueprint or methodology for preparing a local list. It is meet all relevant criteria, and the state of repair of an asset is when deciding whether or not a building, site or structure is a	Hearings Action Point 135
			considered as a non-des		
			Type of asset	Criteria for selection	
			Historic parks and	Historic interest	
			gardens	 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	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	heritage assets buildings of designated historic parks a archaeological remains) who significance of the asset, its formulated in a local list. The assessment for proposal asset will take into account the Non-designated heritage as significance. The assessment he demolition or total loss the significance of the asset with the si	designated heritage asset (This relates to all relevant or structures, not just those on a local list, i.e. non-indigardens; buildings and structures; and/ or here it is designed sympathetically having regard to the relatures, character and setting will be supported. Development character of the non-designated heritage asset whether or not it is for the demolition or total loss of a non-designated heritage he significance of the asset and the scale of ham or loss. Seets should be conserved in a manner consistent with their tent of proposals for new development that would impact on of a non-designated heritage asset will take into account the account of a non-designated to be a non-designated heritage asset will but in Table 10. Structure is considered to be a non-designated heritage following criteria:	To address comments from the National Trust (Rep 27/01) Hearings Action Points135, 136

		1		1
			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	
			This Plan will follow tThe 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 will	
			be used. These non-designated sites may be included in the Northamptonshire	
			Historic Environment Record.	
			Delete footnote 90 as follows:	
			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.	
MM31	Para	99	Amend para 6.49 by adding an additional sentence after the first sentence as follows:	To address
	6.49			comments
			Policy EN16 a) sets out the relevant criteria for managing tourism and cultural developments	from Natural
			in the Nene Valley corridor and the Rockingham Forest. These should not adversely affect	England (Rep
			sensitive receptors (the SSSI and SPA) and would be subject to the SPA Mitigation	48/05)
			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.	
			Add new text after paragraph 6.49 as follows:	

		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.	To address recommendati ons of the HRA. Hearings Action Point
olicy 99-	-100	 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. 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)). 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. 	Hearings Action Point 137

			 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: i) Special regard shall be given to parking provision and the impact upon the amenity of neighbouring properties; ii) Nnew-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. 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 accommodation. 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. 	
MM33	Paras 6.53 to 6.57, Figure 11 and 12	101- 103	New school proposal, Chelveston Road, Higham Ferrers Amend paragraph 6.53 as follows: The Government (DfE) has considered Rushden's Growth Town status and the Rushden East allocation (Joint Core Strategy, Policy 33), initially putting forward proposals through the draft Plan consultation, November 2018 – February 2019 (Specialist School Site consultation paper, January 2020 ⁵). 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	

Delete paragraphs 6.54 to 6.56 as follows:

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).

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.

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.

Delete figure 11 and title as follows:

Figure 11: Sports Masterplan, Newton Road, Higham Ferrers (Planning Policy Committee, 20 January 2020, Item 6, Appendix 3)

Delete paragraph 6.57 as follows:

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

		development of new community facilities (including education) where appropriate (Policy HF.CD2). Delete Figure 12 and title as follows: Figure 12: Land to the west of Moulton College, Higham Ferrers	
MM34 Policy EN17	104	Delete Policy EN17 as follows: Policy EN17: Land south of Chelveston Road, Higham Ferrers 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: 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

Economic Prosperity

MM35	Para 7.17	110	Add the word "target" into the third sentence as follows:	To clarify the context of job
			sets an overall requirement for a net growth <u>target</u> of 7,200 jobs	provision in line with the
				Joint Core Strategy
				Hearings Action Point 77
MM36	Cummonti	115	Add two many negrouses of toyt offer negrouses 7.24 on follower	To address
IVIIVI30	Supporti ng text to	115	Add two new paragraphs of text after paragraph 7.34 as follows:	comments
	Policy		The potential impacts of proposals for new commercial development on the Upper	from Natural
	EN18		Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the	England (Rep
	Para		Special Protection Area SPD set out requirements for developments with the potential	48/06)
	7.34		to have an adverse impact on the SPA. Development with the potential to cause an	10,00)
			adverse effect on the SPA must meet the requirements of JCS Policy 4, or any	To address
			subsequent replacement or update to that policy. A Habitats Regulations Assessment	recommendati
			may be required to accompany any planning application to demonstrate the absence of	ons of the
			any such adverse effect.	HRA.
			The following policy seeks to support the potential for small and medium-size	For
			enterprises (SMEs) which play an important role in the economy, they are generally	consistency
			entrepreneurial in nature, helping to shape innovation. Small-sized enterprises	with Hearings
			typically number fewer than 50 employees, whilst medium-sized enterprise comprise	Action Point
			less than 250 employees. In addition to small and mid-size companies, there are micro-	138
			companies, which employ up to 10 employees.	I I a a wina ay A ati a sa
				Hearing Action Point 82
MM37	Policy	115-	Amend Policy EN18 title to add the following words:	Hearings
	EN18	116		Action Point
			Development of commercial space to support economic growth <u>for Small and Medium-sized</u> <u>enterprises</u>	80,81

			Amend Policy EN18 as follows:	
			Future pProposals 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:	
			 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 Standards ¹¹³ ,;	
			 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	Amend Policy EN19 as follows:	Hearings Action Point 83
			The existing employment sites, as shown on the Policies Map, are protected for employment use ¹¹⁷ . 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:	To address comments from Crown Estate (Reps 44/04 and 44/05)
			 a) There is no realistic prospect of the site or buildings being used or re-used, including redevelopment, for employment purposes¹¹⁸; and/or 	Additional policy amendments Hearings

			 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 	Action Points 84, 85
			c) Development contributions will be made to support economic development across the district.	
MM39	Supporti ng text to Policy EN20 Para 7.49	120	Add new text after para 7.48 as follows: 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.	To address comments from Natural England (Rep 48/07) For consistency with Hearings Action Point 138
MM40	Policy EN20	120	Amend Policy EN20 as follows: 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., or for businesses that need to relocate, will be supported where they meet the following criteria: 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: a) Is adjacent to an existing built up area, provided that and that there is no significant impact on the countryside, or character of the surroundings: ecology, highways, the character of the surroundings-or the amenity of neighbouring properties b) Would not result in a significant impact on the countryside, ecology, highways, the	Hearings Action Point 86
			character of the surrounding sand the amenity of neighbouring or nearby properties:	

			 c) Where necessary, is suitable for the provision of HGV or commercial vehicular access to the strategic or classified road network d) b) For main town centre uses, if applicable, meets the requirements of the sequential and impact tests; and e) c) Provides maximum accessibility for the workforce by sustainable modes of transport such as walking, cycling and public transport. 	
MM41	Supporti ng Text to Policy EN21	121 - 124	Table 13 – amend title of the third column as follows: Designated primary shopping area/ frontage (since 2012 NPPF) Add new text after para 7.56: 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. 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.	To ensure the geographical application is illustrated on the policies map. Hearing Action Points 95, 96
MM42	Policy EN21	124	Amend Policy EN21 as follows:	To ensure the geographical application is

			Development within the town centre boundaries of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds ⁸ 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, 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	illustrated on the policies map. Hearing Action Points 87, 90, 91, 92, 93, 96
			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</u> shopping frontages, <u>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.	
MM43	Policy EN22	126	Amend policy EN22 as follows: Proposals for retail development outside the town centre boundaries primary shopping areas of the six town centres Rushden, Higham Ferrers, Irthlingborough, Oundle,	To ensure the geographical application is illustrated on the policies map.

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

			Raunds ⁹ 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 b) Market Towns Centres 100m ² . Impact assessments and Sequential tests should be prepared in accordance with the relevant national guidance ¹⁰ . Failure to demonstrate there will be no significant adverse impact would result in a refusal of planning permission.	Hearings Action Points 97, 98, 99, 100, 101
MM44	Supporti ng text to Policy EN23	129	Add new text after paragraph 7.76 as follows: 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.	To set out the circumstances which may result in the removal of permitted development rights.
MM45	Policy EN23	130	Amend policy EN23 as follows: Policy EN23: Development of main town centre uses around the ILocal Centres	To ensure it is clear that the geographical application is illustrated on the policies map. Hearings Action points 102, 103, 104,105, 106, 107

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

For Proposals of a scale and type limited to serving the immediate local area, minor development schemes¹⁴ which are adjoining or closely related to within 200m¹² of the designated local centres, as set out below and shown on the policies map, will be supported for, there will be a general presumption in favour of 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 developments rights may be removed where exceptional circumstances are considered to exist.	
	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 thresholds given in Policy EN21.	
	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.	

Housing Delivery

MM46	Para 8.3	132	Add the following text after paragraph 8.3:	Hearings Action Point 34
			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).	
MM47	Para 8.4	132	Provide a new paragraph after para 8.4 as follows:	In response to request from
			The National Planning Policy Framework requires that, where appropriate, plans should set out the anticipated rate of development of specific sites. The Housing	Inspector
			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.	

⁴⁴ 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.

MM48	Paras 8.5 to 8.15, inc tables 14 and 15	132 to 136	or having extal Irthlingboroug period (2011-2 also come for 13. Amend paraged At Raunds, deson the basis of construction of the previous L construction (1)	significant development planning per h, Thrapston, I 2019 2020). All ward; these are raph 8.6 as follows:	elopment sitermission) and Higham Ferongside the encluded included	t each c rers and ese, a la n the lat rth, nort (2008 C irly, the comple). Withi	of the six to d Oundle) rge number eest (2019 <u>2</u> h-east and fore Spatia Thrapston te (earlier n the distri	ome forward (i.e. owns (Rushden, during the first 8 er of smaller dev 2020) AMR House South of the too development phot three further in these sites are	Raunds, 9 years of the lopment signing Site Sown have properties on the lowest properties of th	he Plan ites have chedule ogressed der ocated in der opment	To update with 2020 monitoring information.
			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		

¹³ Planning Policy Committee, 8 June 2020, Agenda Item 10, Appendix 3: https://www.east-northamptonshire.gov.uk/downloads/download/5073/2020_annual_position_statement

Higham Ferrers	Land East of Ferrers School	300	300	0	Higham Ferrers Neighbourhood Plan	Self contained strategic site allocation	
Irthlingborough	West of Huxlow School/ Irthling- borough West	700	250 200	450 <u>500</u>	N/a - Resolution to grant	Strategic site/ SUE	Comm itment on basis of (now defun et) 2008 Core Spatia I Strate 99 JCS Anne x A
TOTAL	Major urban extensions	3,500 3,700	1,750	1,750 1950			

Amend paragraph 8.7 as follows:

As at 1 April 201920, 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 201920;
- Commitments (i.e. extant planning permissions or previously allocated sites), as at 1 April 201920 (201920 AMR, Housing Site Schedule);
- Major development sites (Table 16<u>5</u>, above) plus other emerging proposed development sites identified in the 2018<u>20</u> AMR Housing Site Schedule).

Table 16: Urban areas residual housing requirement, as at 1 April 2019 2020	Housing requirement (2011-31)	Completions 2011-48 <u>19</u>	Completions 2019-19 <u>20</u>	% housing requirement delivered as at 31 March 2049 <u>20</u>	Commitments (starts and planning permissions) as at 1 April 204 <u>920</u>	Commitments (resolutions to grant, Development Plan allocations, Rushden East) as at 1 April 2049 <u>20</u>	Residual requirement as at 1 April 2049 <u>20</u> (committed sites deducted)
Growth Town							
Rushden	3,285	953 1,036	83 19	31.5% 32.1%	8 3 175	1,760 1,515	4 2 (
Market Towns							
Higham Ferrers	560	358 370	12 <u>4</u>	66.1% 66.8%	4 <u>3</u>	300	-114 -117
Irthlingborough	1,350	283 320	37 27	23.7% 25.7%	171 149	329 280	530 <u>57</u> 4
Raunds	1,060	387 662	275 47	62.5% 66.9%	466 347	0	6
Thrapston	680	190 202	12 223	29.7% 62.5%	486 260	0	- -
Oundle	645	384 392	8 <u>3</u>	60.8% 61.2%	7 <u>11</u>	70	17 16
TOTAL	7,580	2,555 2,982	4 27 323	39.3% 43.6%	1,197 945	2,459 2,165	94 1,16

Amend and split paragraph 8.9 as follows:

Table 16 shows that as at 1 April 204920 JCS housing requirements for Higham Ferrers, Raunds and Thrapston are being met, through housing completions (1,234799 dwellings) and housing commitments (1,256563 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.

Outstanding residual housing requirements have been identified at Rushden (426<u>540</u> dwellings), Irthlingborough (530<u>574</u> dwellings) and Oundle (176169 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.

Amend paragraph 8.10 as follows:

For Rushden, commitments consist of extant planning permissions (63 dwellings and plus outstanding Neighbourhood Plan site allocations (560-total 315 dwellings); with 1,200 1,050 dwellings at Rushden East anticipated to be delivered by 2031. This equates to an outstanding requirement for 426-540 dwellings. A further 120-134 dwellings housing land supply is identified at specific unallocated brownfield sites within the urban area, equating to a residual requirement for 306-406 dwellings.

Amend paragraph 8.11 as follows:

For Irthlingborough, commitments for 500-429 dwellings are identified within the 2019-2020 housing land supply. A further 207-199 dwellings is included within the housing land supply, consisting of specific brownfield sites and other emerging sites which did not, as at 1 April 20192020, have planning permission. These emerging sites reduce the residual requirement to 323-375 dwellings. Table 15 (above) shows the latest position for the Irthlingborough West

¹⁴ https://www.east-northamptonshire.gov.uk/downloads/file/12110/background_paper_9 - housing_requirements_- urban_[link to updated BP9 to be added]

urban extension; namely that the trajectory for this site has been set back until later during the Plan period, such that just 250-200 (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.

Amend paragraph 8.12 as follows:

A residual requirement for a further 476-169 dwellings at Oundle is identified, where additional strategic land allocations are required to meet this target. This residual figure for 476-169 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 246 239 dwellings¹⁵, as a minimum.

Amend paragraph 8.13 as follows:

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.

Amend Table 17 as follows:

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 2011-4819	-467 <u>-513</u>
Rural housing completions 201819-1920	-46 <u>-65</u>
Extant planning permissions as at 1 April 20192020 (as shown in	-171
20192020 AMR housing site schedule)	<u>-124</u>
Local Plan/ Neighbourhood Plan site allocations (as at 1 April 20192020)	- 90 -136

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 246239 dwellings for the latest (20192020) monitoring data.

		Emerging Neighbourhood Plan site allocations, other emerging rural sites (>4 dwellings), as at 1 April 20192020 RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL 20192020	- 89 -58 -43 <u>-76</u>	
		Amend paragraph 8.14 as follows:		
		Table 17 demonstrates that the current Local Plan rural housing requirement for the already being met; indeed, exceeded by 43 <u>76</u> dwellings. As specified in the Joint C Strategy, further rural housing sites will continue to come forward through windfalls Neighbourhood Plan allocations and rural exceptions schemes (Policy 11(2)). Furt about these outstanding requirements are set out in the <u>updated (2020)</u> rural hous Background Paper (BP10) ¹⁶ .	Core s, infilling, ther details	
		Amend paragraph 8.15 as follows:		
		The rural housing requirement is already delivered (513-578 dwellings), committed dwellings); or allocations in Neighbourhood Plans "made" since 1 April 2019-2020 (dwellings) and other emerging rural sites (54-58 dwellings). Nevertheless, Neighbourhing groups have sought indicative Ward or Parish level housing "targets", to plassis for allocating future housing sites in a Neighbourhood Plan. This issue is add the updated (2019) NPPF (2021 update), which states that strategic policies should out a housing requirement for designated neighbourhood areas (paragraph 6566) overy least, provide an indicative figure if requested by the neighbourhood planning (paragraph 6667).	(35 ourhood provide a dressed in d also set or, at the	
Policy EN24	138	Policy EN24 to be deleted in its entirety as follows: Policy EN24: Oundle Housing Allocations		Hearings Action Point 26
		The following sites are allocated for housing development at Oundle as shown on the Map and in the site specific maps under Policies EN25 to EN27:	e Policies	
		i) Land rear of Cemetery, Stoke Doyle Road – around 70 dwellings;		

⁶ <u>https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10 - housing_requirements - rural [Link to updated BP10 to be added]</u>

			 ii) Cotterstock Road/ St Peter's Road — around 130 dwellings; and iii) St Christopher's Drive — around 100 dwellings. Key considerations to be taken into account for each of the sites along with appropriate Local Plan policies are: 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	Supporti ng text to Policy EN25	139 and 140	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 ¹⁷ 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	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

			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.	
MM51	Figure 14	140	Amend Figure 14 as follows: Text stating "longer term development potential" and accompanying arrow to be removed from Figure 14.	Hearings Action Point 41
MM52	Policy EN25 Criterion b)	140	 Amend Policy 25 as follows: 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, 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 	Hearings Action Point 40
MM53	Para 8.29	141	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 14 (above), in order to meet future requirements. Amend para 8.29 to delete the final sentence and replace with the following sentence:	To address comments from

			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 matters and other site-specific constraints. And insert a new para as follows: 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.	Anglian Water (Rep 22/05)
MM54	Policy EN26	143	 Site Specifics 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. 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). 	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

			 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) 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> 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. 	
MM55	Policy EN27	145	 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 to meet older persons' needs. Provision of such housing should be in lieu of the normal 	To address comments from Anglian Water (Rep 22/07, 22/08) Hearings Action Point 73

			requirement for affordable housing; otherwise affordable housing should be delivered in accordance with normal policy requirements.	Hearings Action Point 43
			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. Consideration may be given to the provision of an emergency access via Ashton Road.	
			d) Connections will be provided to the adjacent Public Rights of Way network, providing access to the Nene Way and adjacent villages (e.g. Ashton, Barnwell and Polebrook).	
			e) Structural landscaping will be provided for the site boundary, to mitigate the impacts of noise and other pollution from the A605.	
			f) The design and layout should consider the proximity of the foul pumping station ¹⁹ . to reduce the risk of nuisance/ loss of amenity associated with the operation of this.	
			And add footnote:	
			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	
MM56	Paras 8.35 to 8.39	145- 146	Amend paragraph 8.35 as follows: 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 AMR ²⁰ , indicates the following:	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/

			Amend paragraph 8.36 as follows: The April 204920 trajectories for the two sustainable urban extensions equate to a combined reduction of 8501,050 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.	
			Amend the final sentence of paragraph 8.38 as follows: 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 201920).	
			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 244-247 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 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.)	
MM57	Supporti ng text to	147- 149	Add new text after paragraph 8.46, as follows:	To address recommendations of the HRA.

	Policy EN28		The site is located approximately 3.5km from the Upper Nene Valley Gravel Pits SPA, it is therefore possible it could constitute functionally linked habitat for the SPA. The applicant will be required to provide evidence that the development will not result in an adverse effect on the integrity of Upper Nene Valley Gravel Pits SPA/Ramsar. To achieve this, surveys will be required to determine habitats and current use of the site to determine if it does support a significant population ²¹ 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'	
MM58	Policy EN28	149	Amend Policy EN28 as follows: 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.	To address comments from Bellway Homes (Rep 26/05)
			A design led masterplan is to be agreed by the local planning authority as part of the application prcess, which will address all relevant policy requirements. The key principles of the proposed development will deliver the following:	
			a) Up to It is expected that the proposed allocation will deliver around 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); 	

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

			 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 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. 	
			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.	
MM59	Policy EN29	150	Amend Policy EN29 as follows:	Hearings Action Point 63, 64, 66
			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 minimum 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.	

MM60	Policy EN30	153	Amend Policy EN30 as follows: 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	Hearings Action Point 67
			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	Supporti ng text to Policy EN31	156	 Add new supporting text at the end of paragraph 8.71 as follows: 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 	

MM62	Policy EN31	157	Amend Policy En31 as follows: To help meet future requirements for retirement housing for older people, the Local Planning	Hearings Action Point 68, 69, 70, 71,72
			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:	To address
			 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. 	comments from Bellway Homes (Rep 26/08)
			The criteria for site selection and design principles will also need to meet the requirements laid out in Appendix 3 <u>5</u> , 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 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 part of a retirement housing scheme and mayinclude communal facilities and on-site management.
- c) Supported Housing for Older People Extra Care:
 - i. SUEs and Strategic Sites

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.

ii. Allocated sites

- 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.
- iii. Windfall sites

²² Rushden Neighbourhood Plan Policy H2F

²³ Higham Ferrers Neighbourhood Plan Policy HF.H4

			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.	
MM63	Policy	161-	Amend Policy EN32 as follows:	Hearings Action
	EN32	162	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.	Point 76 and Post Hearings Letter
			a) <u>Self build housing</u>	
			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 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:	
			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. 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. 	
MM64	Table 21, paras 8.96 – 8.97	163- 164	Amend paragraph 8.93 as follows: 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.	Factual correction and update in response to the Inspector's Initial Question IQ5.
			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. Amend table 21 as follows:	
			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

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

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

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.

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.

Amend paragraph 8.98 as follows:

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 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. 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.

Delivering Sustainable Urban Extensions

MM65	Para 9.1	165-	Amend paragraph 9.1 as follows:	To update with
	- 9.5	166		2020
			The Joint Core Strategy (Annex A), made provision for the delivery of 2,300 dwellings (27% of	monitoring
			the total requirement for 8.400 dwellings) and accompanying jobs, facilities and services at	information.
			the two Sustainable Urban Extensions (SUEs) within the District during the Plan period.	

Trajectories for SUEs in subsequent Authorities' Monitoring Reports (2017 , 2018—and-, 2019 24 and 2020) have seen the anticipated delivery at these progressively diminishing; such that as at 1 April 2019-2020 it is currently forecast that just 1,4501,250 dwellings would come forward at the two sites by 2031 (1715% of the total requirement). Table 22 below provides a comparison between the 2016 (Joint Core Strategy adoption) and 20192020 (latest Authorities' Monitoring Report) positions.

Amend table 22 as follows:

Table 22		Anticipated deliv	ery 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, 4,200 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

²⁴ http://www.nnjpdu.org.uk/publications/amr-2018-19-assessment-of-housing-land-supply-2019-24/

			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. Add new paragraph after paragraph 9.7: 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.	
MM66	Policy EN33	168- 169	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, above identifies the development boundaries for the delivery of the Rushden East Sustainable Urban Extension (SUE). This development, also known as High Hayden Garden Community, 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 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. 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).	
			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 site to inform future planning applications and will ensure a comprehensive	

approach to site delivery. 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 Planning applications will be required to be broadly consistent with the MFD and the principles of the Government's Garden Communities initiative.

pProposals for development will be granted planning permission where they are consistent with the relevant policy expectations and guidance set out in the MFD listed below. Further detailed guidance and illustration on how these policy expectations might be met is set out in the MFD. The MFD accords with the adopted Joint Core Strategy Policy 33 to ensure a comprehensive approach to site delivery.

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. <u>Providing opportunities for small-businesses and those driving enterprise and innovation.</u>
- 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 shown on Figures 2.3 and 2.38 in the MFD, 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:

- <u>Traffic signals provided to control vehicular traffic and allow for safe</u> pedestrian and cycle movement;
- <u>Crossings at-grade to ensure maximum accessibility for pedestrians and</u> cyclists;
- Change in surface material to ensure that user priority is clear and that the crossing is legible for pedestrians, cyclists and drivers;
- <u>Minimum pedestrian crossing width of 8m to allow comfortable and safe movement for pedestrians.</u>
- 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 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.
- 10. Provision of high quality, attractive and safe off-site connections for nonmotorised 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.

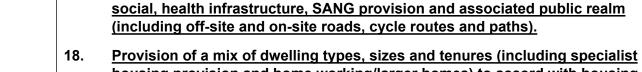
Environmental:

- 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 in line with Figure 2.2 of the MFD.
 - 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.
- <u>Viewing corridors of the spire of the Grade I listed Church of St Mary's</u>
 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, 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
- 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</u> (approximately 2.20ha) in line with MFD Figure 2.2.
- 17. <u>Prepare and agree a delivery strategy (including onward adoption and management arrangements) for all education, energy, drainage, community, </u>



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 EN29-EN32, 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, (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

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.

Town Strategies

MM67	Para 10.10	174	Amend para 10.10, 2 nd sentence as follows: Policy EN34 sets out a framework for assessing development opportunities within and around the <u>wider</u> town centres, as and when these arise.	Hearings Action Point 109, 110
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MM68	Policy EN34	174	Amend Policy EN	34 as follows:		
	LINOT		Oundle, Raunds by increasing footl proactively with sta Market Towns to s a) Maintain a	posals for the town centres: Rushden, Fand Thrapston sites should seek to incomplete to sustain and enhance vitality and visakeholders where opportunities arise with secure the following outcomes: a mixture of uses that attract visitors, including both economic, social and, in	rease local community interaction, ability. The Council will work thin the identified Growth and and and encourage greater social	
			,	e and improve the retail offer of the town d active frontages;	centres, by way of enhancements	
				e leisure and cultural offer of each town ght time - economies;	to provide for the growth of both	
			of new lan	plement high quality public realm improve dmark features, within town centres esp d in town strategies or neighbourhood p	pecially addressing gateway sites,	
				ancements to pedestrian connectivity land employment areas beyond; and	ooth within town centres, and to	
			developme	ng a step change in the quality of urbent with a focus on low carbon energy solutives such as urban tree planting.		
				ortunities will be informed by the prepart out through development briefs.	ration of town strategies, with site	
MM69	MM69 Table 24 176		Remove third col	umn of Table 24 as follows:		
			Spatial parts of Rushden	Characteristics	Relevant spatial strategy	

and Higham Ferrers		policies
Core urban area	 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)	 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)

Rushden East (Sustainable Urban Extension)	 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 	Policy EN1(1) (a); JCS Policy 33	
Avenue Road/ Bedford Road/ Newton Road	 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) 	JCS Policy 11(2) (a) Neighbourhood Plan Policy H1	
Higham Ferrers	 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 	Policy EN1(1) (a); JCS Policy 11(1)(b)	

MM70	Policy EN35	180	Redevelopment proposals for the Splash Pool and Wilkinson sites together with the associated highways network, as shown as an area of opportunity in figure 21 above. on the Pelicies-Map-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 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) 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) e) 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.	Hearings Action Point 113, 114, 115 To address comments from Historic England (SOCG) (e) (Rep 39/08) and Anglian Water (f) (Rep 22/13)
MM71	Policy EN36	181- 182	Add new text after para 10.25 to form a new para as follows:	To address recommendati

	supportin g text		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.	ons of the HRA.
MM72	Para 10.30	183	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.	To address recommendati ons of the HRA.
MM73	Policy EN37	184	 Amend Policy EN37 as follows: 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; 	To address comments from Historic England (SOCG) (f) (Rep 39/09) and Anglian Water (g) (Rep 22/17)

			residential are Rectory Road; e) Appropriate de longstanding t f) The preserva accordance v	evelopment contributions for education and training, to ousiness premises; tion and enhancement of the heritage assets on the vith a heritage impact assessment and eding of suitable access for the maintenance of four	ments along offset the loss of	
MM74	Table 25 After Para 10.42	189	Amend Table 25 as Spatial parts of Irthlingborough Core urban area (existing)	Characteristics South of the A6, defined by main arterial routes – Finedon Road, Station Road, Wellingborough Road Includes key services and facilities – town	Relevant spatial strategy policies Policy EN1 (1) (b): JCS Policy 11(1) (b)	Hearings Action Point
			Irthlingborough West (Sustainable Urban Extension)	centre, schools Hosts main employer – Whitworth 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	 Former principal employment and leisure hub Separated from main urban area by A6 Bypass 	Policy EN1 (1) (b): JCS Policy 11(1) (b)	

				 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)	 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)	 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 			
MM75	Policy EN39	192	The vacant Select & Sa is allocated for redevelor	vacant Select & Save and St Peter's Way Car Park site, as shown on the Policies Map, ocated 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) 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	Supporti ng text to Policy EN40	194	Amend para 10.52 as follows: 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 stadium site is surplus to requirements), in accordance with NPPF paragraph 979. Account should also be taken of the findings of any subsequent Playing Pitch Strategy. 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. Add new text after paragraph 10.54 as follows:	Request for Note after Hearings resulting in text change (AP 118) To address rep by Sport England
			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	comments from Natural England (Rep 48/08)

			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.
MM77	Policy EN40	194	Amend Policy EN40, as follows: 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 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)

				protecting the s Crow Hill Iron Ag Provision for new access, and Mitigate for the unless it can be	and massing together with high quality landscaping, setting of nearby heritage assets, such as Irthlingborous ge Fort and non-designated heritage assets, and w moorings along the River Nene Navigation allowing a loss of the stadium, playing pitches and ancillary to demonstrated that the facilities are surplus to recraph 99 of the NPPF	gh Bridge and direct riparian facilities,	To address comments from Historic England (SOCG Rep 39/11) To address rep by Sport England	
MM78	Para 10.57	195	Oundle closely Figure 2 spatial s	para 10.57 as for and its surround connected village 28 and Table 26 (strategy policy re d within the par		oke Doyle. ne relevant that are ell (Barnwell	To address comments made by Oundle Town Council (Rep 25/05)	
MM79	Table 26 After Para	After Para	ter		Amend Table 26 as follows: Table 26			To address comments made by
	10.57			Spatial parts of Oundle	Characteristics	Relevant spatial strategy policies	Oundle Town Council (Rep 25/08)	
				Historic core	 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 EN1 (1)(c); JCS Policy 11(1)(b)	Hearings Action Point	

			Oundle north	 Hosts main employment areas _ Main employment areas situated to the east of the historic core of the town - Nene Business Park/ Fairline Boats; East Road 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 	Policy EN1 (1)(c); JCS Policy 11(1)(b)	
			Oundle Marina/ Barnwell Country Park	 coalescence with Glapthorn 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)	 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	Amend para 10.60 as fol	llows:		To address comments made by

	and 10.61		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. 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. Amend para 10.61 as follows: While both the The recycling centre and former Council car park could provide development opportunities, neither site are brownfield urban sites, but neither is currently available. Both are brownfield sites, situated within the urban area. Future development proposals If either site becomes available in the longer term, any potential redevelopment scheme would 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). Future development proposals could be supported through site specific development briefs. 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.	Oundle Town Council (Rep 25/9 & 25/10)
MM81	Policy EN41	200	Amend Policy EN41 as follows: Redevelopment proposals for the former Riverside Hotel, as allocated on the Policies Map, will be supported for the following uses:	Hearings Action Point 120
			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) Retention Preservation and enhancement of the heritage asset;	

			arrangemer c) Provision for access; and d) Improved co	or new moorings along the River Nene Navigation with o	direct riparian	
MM82	Table 27 After Para 10.68	202	Table 27 Spatial parts of Raunds Core urban area	Characteristics Defined by London Road (west) Brick Kiln Road	Relevant Spatial strategy policies Policy	Hearings Action Point
			Core urban area	 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 	EN1(1) (b); JCS Policy 11(1)(b)	
			Raunds north	 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)	

			Raunds north east	 Sustainable urban extension to north east of existing urban area, known as Northdale Electric Significant new green infrastructure corridor adjacent to Brooks Road, utilising Hog Dyk 	nd EN1(1) r (b); JCS	
			Raunds south	 Sustainable urban extension to the south of town Two significant developments to south of G Street – Weighbridge Way (developed durit 2000s) and Willow Way (2010/11) Major development at Darcy Park (also known Darsdale Farm) recently started, including significant new public open space 	rove (b); JCS (Policy 11(1)(b)	
			Warth Park (west of Raunds)	 Main employment area of Raunds Major strategic warehousing and distributio Also includes significant new green infrastrated between warehouses and A45 	1	
			Brooks Road	 Ribbon development along Brooks Road, b Northdale End Suburban character Transition between urban (Northdale End) a rural (Brook Farm Livery Stables) 	EN1(3) (a); JCS	
MM83	Table 28	204	Amend Table 28			Hearings
	After Para 10.72		Spatial parts of Thrapston and Islip	Characteristics	Relevant spatial strategy policies	Action Point
			Core urban area	 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)	

MM84	Para 10.83	207- 208	Add new text after	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 paragraph 10.83, as follows:	11(2)(a)	To address recommendati ons of the HRA.
			Islip south	 Linear area, west of River Nene, situated between Kettering Road and A14 Major strategic employment site, including lelip Euroace and Primark premises 	Policy EN1(2)(b) & EN1(3)(a); JCS Policy 11(2)(a)	
			Islip village	 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 	Policy EN1(2)(b); JCS Policy 11(2)(a)	
			Haldens Parkway (employment area)	 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 	Policy EN1(1)(b); JCS Policy 11(1)(b)	
				Huntingdon Road and Midland Road, with post-war suburban development to the north (Oundle Road, Lazy Acre) Includes key services and facilities – town centre retailing, school, main public open spaces, leisure centre		

			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.	
MM85	Policy	209	Amend Policy EN42, as follows:	To address
EN ₄	EN42		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:	comments from Historic England (SOCG) (Rep
			 a) A balance and mix of town centre uses, including convenience retailing, financial services and/ or food and drink businesses; 	39/12)
			 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 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.	

Monitoring and Implementation

MM86	Para 11.4	210	Amend paragraph 11.4 (including amending bullet point 3 and introducing a new bullet point after bullet point 3)) as follows:	Northamptons hire County
			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	Council

submission Plan consultation (2019) identified various localised infrastructure priorities, over and above the strategic projects as identified above: Bullet point 3:	(Development Infrastructure) (Rep 49/04, 49/10)
 Education – delivery of new academies/ free schools, working with the Department for Education, in accordance with current local education authority²⁵ and national²⁶ policies. 	
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;	

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

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

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

²⁶ Planning for Schools Development (2011):

MM87	Table 29	214 to 219	Amend ta	ble 29 as follows:				Hearings Action Point 178
			Table 29	: Performance ind	licators and target	s for monitoring		
			Policy	Objective	Indicator	Targets Aims	<u>Targets</u>	
			EN1	Provide	Number of	Direct	Levels of	
				additional rural spatial direction/	dwellings permitted within	development to Rushden and the	development to accord with the	
				settlement	the different	Market Towns	spatial roles set	
				hierarchy (i.e.	areas of the	Restrict all but	out in table 2 of	
				large/ small/	settlement	small scale or infill	the Plan	
				restraint villages and open	hierarchy	development in rural areas, unless	Levels of	
				countryside)		promoted through	residential	
				,		Neighbourhood	development to	
						Plans and/ or rural exceptions	align with table 3 of the Plan	
						housing schemes	3 Of the Plan	
			EN2	Provide a clear	Number of	Restrict	All proposals to	
				differentiation	dwellings	inappropriate	meet the	
				between the urban/built up	permitted within the main urban	development beyond the main	requirements of the policy.	
				areas and their	areas, and	urban/ built up	the policy.	
				surrounding	beyond the main	areas		
				rural hinterlands Provide	urban areas			
				development	Location and type of			
				principles to	development			
				guide				
				development in the rural area.				

EN4	Provide a clear differentiation between the freestanding villages and their surrounding rural hinterlands Provide a clear differentiation between urban outliers/ ribbon developments and their surrounding rural hinterlands Protect the peripheral land of settlements against unsuitable development	Number of dwellings permitted within the free standing villages, and beyond the free standing village areas Number of dwellings permitted within the ribbon development areas of lower Crow Hill (Irthlingborough) and Brooks Road (Raunds) Development permitted outside of the defined settlement	Restrict inappropriate development beyond the free standing villages Restrict inappropriate development in the defined ribbon development areas Restrict inappropriate development on the periphery of settlements with a	No inappropriate development on the periphery of settlements, other than for	
EN6	1 •				
	guidelines for appropriate	dwellings permitted and/ or	development of inappropriate new	inappropriate new build	

	replacement dwellings in open countryside	built in the open countryside	build replacement dwellings in open countryside	replacement dwellings in the open countryside other than those which accord with Policy EN6.
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 <u>To</u> increase in connected open space and GI throughout the district	Overall net gain in GI.
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	Increase in the number of GI projects completed. Completion of the Greenway and associated projects.
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 To facilitate the protection of Local Green Space	No loss of Local Green Space. Net increase in Local Green Space.

EN10	Local Green Space 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 To ensure new development makes adequate provision for open space.	Net increase in open space across the district. No net loss of open space.
EN11	Enhance existing sport and recreation facilities, or provide new sport and recreation facilities	Number of permitted strategic developments Amount of new sports and recreation facilities provided/contributions secured toward facilities.	Net increase in sport and recreation facilities across the district 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.
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	To enable and promote healthy lifestyles. Submission of Health Impact Assessments to accompany all major planning applications.	All major applications to be accompanied by a HIA.

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.	Refusal of planning permission where insufficient mitigation is proposed to address negative health impacts. Restrict inappropriate development of new buildings and extensions so that they are in keeping with the surrounding	100% of cases refused on design grounds to be upheld at appeal.	
EN14	Sustain and enhance the appearance and setting of designated heritage assets	appeal 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	environment 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	

		their intrinsic environmental value including sites of international, national, regional, sub regional or local significance		Scheduled Monuments; Reduce the number of heritage assets at risk (number on Historic England's Heritage at Risk Register)
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	Maintain non- designated heritage assets (no loss).
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 Rocking Forest areas, including the conversion of redundant small- scale rural buildings	A net increase of tourist/ cultural facilities

	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	A net increase in the number of completions for small and medium scale commercial development.	
EN19	Ensure that existing employment sites are protected for employment use	Use status of the sites	No To prevent the loss of employment uses within the Protected Employment Areas unless the site is demonstrably no longer suitable for employment	No net loss of employment uses within the Protected Employment Areas unless the site is demonstrably no longer suitable for employment	

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	All expanded/reloc ated business to be adjacent to built up area.	
EN21	Increase the vitality of the town centres and primary shopping areas frontages	Public realm improvements within the town centres and primary shopping areasfrontages 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 areas 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.	
EN22	Provide floorspace	Number of permitted retail	Restrict inappropriate retail	No specific target, however,	

EN23	thresholds for impact assessments for retail developments Provide clear direction for specified main	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 Number of permitted specified main	development outside the primary shopping areas of the six towns Encourage specified main town centre uses	monitoring indicator to identify the number and type of these developments. 100% of proposals for out / edge-of centre supported by a sequential test and impact assessment above the relevant threshold 100% adjoining/closel y related to built
	town centre use developments <u>at</u> outside of the local centres	town centre uses adjacent towithin 200m of the local centres	at outside of the local centres that offer day to day local services, improved connectivity and do not affect local amenity	Amount of new floorspace for each type of use
-EN24	Delivery of sites in accordance with the Local Plan (Joint Core Strategy) requirements	Meeting overall strategic housing requirements at Oundle and delivery of	To provide for strategic shortfall in housing numbers of around 300 dwellings at Oundle	

EN	Implementation of Stoke Doyle Road site within the Plan period	associated infrastructure Meeting strategic housing requirements site specific	To provide site specific housing requirements assisting the strategic shortfall at Oundle	Delivery of the site by 2031
EN	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
EN	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
EN	28 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
EN	Delivery of an appropriate quantum of Category 3 (wheelchair accessible or adaptable)	Number of Category 3 (wheelchair accessible or adaptable) units delivered	Delivery of 5% of units as Category 3 housing on sites of 50 dwellings or more To increase the delivery of Category 3 housing	Delivery of 5% of units as Category 3 housing on sites of 20 dwellings or more

EN30	housing to meet local needs 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.	Encourages a range and mix of house types and tenures to meet the needs of the wider community in accordance with the evidence	100% in accordance with tenure/ size proportions set out in the evidence base, unless justified by evidence	
EN31	Delivery of specialist housing: • Older persons accommodati on to meet local need • Extra Care development schemes as part of major strategic sites in accordance with local needs	Tenure split of properties 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: Rushden East SUE Irthlingborough West SUE St Christopher's Drive, Oundle	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: Rushden East SUE Irthlingborou gh West SUE St Christopher'	

			East of Ferrers School, Higham Ferrers To increase delivery of specialist housing for older persons.	s Drive, Oundle Hayway, Northampton ton Road, Rushden East of Ferrers School, Higham Ferrers	
EN32	Delivery of self and custom build	Number of self and custom built dwellings achieved on sites of 50 dwellings or more	At least 5% of plots on sites of 50 dwellings or more safeguarded for self or custom built dwellings-To increase delivery of self and custom build housing.	At least 5% of plots on sites of 50 dwellings or more provided for self or custom built dwellings Meeting demand on self/custom build register	
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	Meeting strategic housing requirements site specific Phased delivery of SUE in accordance with MFD phasing/ trajectories	Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory for East Northamptonshire	Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory	

EN34	Masterplan Framework Document (MFD) 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 Enhance vitality/viability of town centres Development	To ensure the principles for delivering the SUE are met. No of development proposals approved in accordance with all of the relevant policy criteria	Increased footfall in town centres Increase in the proportion of retail use in town centres Increase in proportion of town centre uses Increase in the no of active frontages. Reduction in the no of vacancies in town centres in town centres	
	of the Splash Pool and Wilkinson sites	permitted on the Splash Pool and Wilkinson sites	the sites to include pedestrian links, a new public square, public realm improvements, and provision of public car parking	redevelopment of the site as set out in Policy EN35.	

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

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	appropriate mitigation measures Redevelopment of the site to include a mix of main town centre uses, enhancement of the primary shopping frontage, pedestrian connections, suitable service	By 2031, redevelopment of the site as set out in Policy EN39.
EN40	Redevelopment of the former Rushden and Diamonds FC Stadium site	Development permitted on the former Rushden and Diamonds FC Stadium site	suitable service arrangements, public car parking, live-work units at first floor or above, and enhancement to the settings of heritage assets Redevelopment of the site to include flood compatible employment uses, appropriate flood	By 2031, redevelopment of the site as set out in Policy EN40.
			mitigation measures, enhancements to biodiversity, improved pedestrian and cycle connections, high quality landscaping, and new moorings	

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	By 2031, redevelopment of the site as set out in Policy EN41.	
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	By 2031, redevelopment of the site as set out in Policy EN41.	

		the setting of heritage assets, and public car parking		

Glossary

MM88	Glossary	221	Amend glossary definition as follows:	For clarity
			Infill or windfall development- Smaller scale, minor development proposals, typically up to 5	following
			dwellings for rural or 10 dwellings for urban areas, which take place within the existing built up	revision to
			area, as defined by Policies EN2-EN4 EN1-EN2 and the supporting text.	Policies EN1 -
				4
MM89	Glossary	223	Amend definition for Primary Shopping Area/ Primary Shopping Frontage as follows:	Hearings
				Action Point 94
			Primary Shopping Area (or Primary Shopping Frontage) – defined areas where retail development is concentrated.	
			Primary Shopping Frontage – Shopping frontage which contains a high proportion of	
			retail uses.	

Appendix 1

MM90	Policy	Append	Amend Strategic/ non-strategic (with commentary) column as follows:	To reflect
	EN33	ix 1,		discussions at
		page	Non-sStrategic – Policy 33 of the Joint Core Strategy provides the strategic direction; i.e.	the hearing
		12	establishing the principle of development to the east of the A6 Bypass, Rushden. Policy EN33	sessions.
			provides additional site-specific detail; i.e. setting site boundary/ zonal allocation and allowing	(Action Point
			for incorporation of Masterplan Framework Document into Local Plan Part 2.	2)

	In addition, revised Policies EN1 and EN2 remain as strategic policies, whilst Policies EN3, EN4, EN17 and EN24 are deleted as policies.	
--	--	--

Appendix 5

MM91	Appendix	Append	Amend the type of home in the final table as follows:	Hearings
	5 -	ix 5,		Action Point 74
	Specialis	page 2	Apartment, or bungalow or smaller home	
	t and			
	Older			
	Persons			
	Housing			
	Provision			

Appendix 6

MM92	Appendix 6 – Rushden East MFD	Append ix 6	Delete A	elete Appendix 6 in its entirety and associated references to Appendix 6.									Post Heari Letter Action	
MM93	Appendix 6 – Housing Trajector y	Append ix 6	Insert no	sert new Appendix 6 as follows:									In respons request fro Inspector	
Source Housing	<u>of</u> g Supply	2011/1 2 to 2019/2 0	<u>2020/2</u> <u>1</u>	2021/2 2	<u>2022/2</u> <u>3</u>	2023/2 4	<u>2024/2</u> <u>5</u>	<u>2025/2</u> <u>6</u>	<u>2026/2</u> <u>7</u>	<u>2027/2</u> <u>8</u>	2028/2 9	<u>2029/3</u> <u>0</u>	2030/3 1	

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

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

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Appendix B

Policies Map

Policies Map	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.	
	Amend policies map legend as follows:	
	EN8 - New Suggested Local Green Infrastructure Corridors	
Rushden and Higham Ferrers	Amend Rushden and Higham Ferrers Inset Map Legend as follows:	
Inset Map	EN2 <u>1</u> 3 – Town Centre Boundaries	
	EN2 <u>1</u> 3 – Primary Shopping Frontages	
	Update Local Centre Names in the legend to reflect those listed in the Policy.	
Irthlingborough Inset Map	Amend Irthlingborough Inset Map Legend as follows:	
•	EN2 <u>1</u> 3 – Town Centre Boundaries	
	EN2 <u>1</u> 3 – Primary Shopping Frontages	
Oundle Inset Map	Amend Oundle Inset Map Legend as follows:	
	EN2 <u>13</u> – Town Centre Boundaries	
	EN213 – Primary Shopping Frontages	
Thrapston Inset Map	Amend Thrapston Inset Map Legend as follows:	
	EN2 <u>13</u> – Town Centre Boundaries	
	EN213 – Primary Shopping Frontages	
Raunds Inset Map	Amend Raunds Inset Map Legend as follows:	
··T	EN2 <u>1</u> 3 –Raunds Primary Shopping Area	
	EN23 - Raunds Secondary Shopping Area (Relates to Raunds Neighbourhood Plan Policy)	

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East Northamptonshire Local Plan (Part 2) SA

SA Report Addendum: Appraisal of Modifications

November, 2022

Quality information

Prepared by	Checked by	Verified by	Approved by
lan McCluskey	lan McCluskey	lan McCluskey	Alastair Peattie
Associate Director	Associate Director	Associate Director	Associate Director

Revision History

Revision	Revision date	Details	Name	Position
1	20 th November 2022	Draft Appraisal	lan McCluskey	Associate Director
2	22 nd November 2022	Final draft for Client Review	Alastair Peattie	Associate Director
3	7 th December	Final Report following Client Review	lan McCluskey	Associate Director

Prepared for:

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Non-Technical Summary

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the East Northamptonshire Local Plan (Part 2). SA is a mechanism for considering and communicating the likely effects of the plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.

This is a Non-Technical Summary (NTS) of this SA Report Addendum, which is an Addendum to the full SA Report published in 2021 [Exam ref: A-02].

The aim of the SA Report Addendum is essentially to present information on the proposed modifications, and alternatives where appropriate, with a view to informing the forthcoming consultation and subsequent plan finalisation.

Scope

The scope of the SA work, with respect to the East Northamptonshire Local Plan (Part 2), is introduced within the SA Report published in 2021 [Exam ref: A-02]. Essentially, the scope is reflected in a list of sustainability objectives and guiding questions, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed in Table 1 below.

Table 1: Sustainability Topics

Sustainability Objective

Accessibility

To improve accessibility and transport links from residential areas to key services, facilities and employment areas, and enhance access to the natural environment and recreation opportunities

Housing

Ensure that new housing provided meets the needs of the area, provide affordable and decent housing for all

Health

Improve overall levels of physical, mental and social well-being, and reduce disparities between different groups and different areas

Crime

To improve community safety, reduce the incidences of crime and the fear of crime - a safe place to live

Community

Value and nurture a sense of belonging in a cohesive and vibrant community, whilst respecting diversity.

Skills

To improve overall levels of education and skills.

Liveability

To create healthy, clean and pleasant environments for people to enjoy living, working and recreating in and to protect and enhance residential amenity

Biodiversity

Sustainability Objective

To protect, conserve and enhance biodiversity, geodiversity, wildlife habitats and green infrastructure to achieve a net gain and to avoid habitat fragmentation

Landscape

To protect and enhance the quality, character and local distinctiveness of the natural and cultural landscape and the built environment.

Cultural Heritage

Protect and enhance sites, features and areas of historical, archaeological, architectural and artistic interest and their settings

Climate change

Reduce the emissions of greenhouse gases and impact of climate change (adaptation)

Air quality

To maintain or improve local air quality

Water

Maintain or improve the quality of ground and surface water resources and minimise the demand for water

Natural Hazard

Reduce the impact of flooding and avoid additional risk

Soil and Land

Ensure the efficient use of land and maintain the resource of productive soil

Minerals

Ensure the efficient use of minerals and primary resources

Energy use

To mitigate climate change by minimising carbon based energy usage by increasing energy efficiency and to develop North Northamptonshire 's renewable energy resource, reducing dependency on non-renewable resources

Waste

To reduce waste arisings and increase reuse, recycling and composting

Employment

Maintain and enhance employment opportunities and to reduce the disparities arising from unequal access to jobs

Wealth Creation

Retain and enhance the factors which are conducive to wealth creation, including infrastructure and the local strengths and qualities that are attractive to visitors and investors

Town Centres

Protect and enhance the vitality and viability of town centres and market towns

Screening of Proposed Modifications

The Council is proposing a number of minor and main modifications to the submitted Local Plan (Part 2) as a result of the examination hearing sessions and representations received. It is necessary to screen the modifications to determine if they significantly affect the findings of the main SA Report [Exam ref: A-02] and if further appraisal work is therefore required.

All of the proposed Main Modifications have been screened to determine if further SA work is required or if they can be screened out from further appraisal work. The proposed changes and detailed findings of the screening including the rationale for why a main modification was screened in or out are provided in Appendix 1 of this SA Report Addendum.

The majority of modifications involve minor edits to the Plan text for clarification, factual correction, to enhance readability or other minor reasons and have therefore been screened out as not being significant in terms of the SA (i.e. they would be inherently unlikely to give rise to significant effects or affect the overall conclusions).

The screening of the proposed Main Modifications (Appendix A) found that the majority of modifications would not be likely to have a significant effect on the findings of the previous SA work presented in the main SA Report [Exam ref: A-02]. This is because the changes do not fundamentally alter the thrust of the policies.

Only the following Modifications were identified that required further consideration in the SA at this stage. These are as follows:

MM17 - Amendments to Policy EN7 (Local Green Infrastructure Corridors)

 The policy is clearer in terms of the role of local GI corridors and how they link to strategic corridors.

MM27 – Amendments to Policy EN13 (Design of Buildings / Extensions)

The policy no longer references electric charging points and car parking.

HRA Related amendments (MM50, MM57, MM77)

 Several modifications have been made in response to recommendations within the HRA and through dialogue with Natural England.

MM34 - Policy EN17 deleted as the allocated site now has planning permission

 Land south of Chelveston Road, Higham-Ferrers has planning permission and is no longer to be allocated. Therefore, effects associated with this site no longer relate to the plan.

MM73 - Policy EN37 (Rectory Business Centre Site)

 Amendments to policy clauses include greater clarity on heritage matters, and no longer refer to the need to support alternative skills and education opportunities.

MM87 - Monitoring

 Updates to the monitoring framework in the Local Plan are proposed, which ought to be reflected in the SA Report.

Consideration of alternatives

The Council explored whether there were any reasonable alternatives in relation to the proposed Main Modifications. It was considered that no alternatives were reasonable or needed to be appraised through further SA work.

Appraisal of Modifications

The appraisal identified that the main modifications would lead to limited changes to the sustainability appraisal findings when considering the overall effects of the Plan 'as a whole'. The key differences are summarised below:

- The Plan is predicted to have a less significant effect with regards to education and skills.
 Whilst still positive, the effects would no longer be considered to be significant. This mainly relates to a new school site allocation being removed. However, the outcomes for communities will be the same as this site already has planning permission.
- The Plan is predicted to have slightly improved effects with regards to heritage, but this
 does not change the overall effects from minor positive.
- The Plan is predicted to have slightly improved effects with regards to biodiversity, but this
 does not change the overall effects from minor positive.
- The Plan is predicted to have slightly less positive effects with regards to health and liveability, but the overall effects are still like to remain significantly positive.
- The Plan is predicted to have slightly less positive effects with regards to air quality, but the overall effects are still like to remain the same (minor positive).

Mitigation and enhancement

No further mitigation or enhancement measures were identified at this stage.

Monitoring

Given that the Local Plan monitoring framework has been updated, it is helpful to reflect this in the SA Report. As such, the SA monitoring framework has been amended to ensure that the indicators are suitable. The monitoring framework will be finalised following adoption.

Next Steps

Following consultation, the Inspector will consider all representations received, before deciding how to report on the Plan's soundness. Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

1. Introduction

Background

- 1.1 North Northamptonshire Council (formerly East Northamptonshire Council) is preparing a new Local Plan (Part 2). The Plan is at an advanced stage, having gone through various rounds of consultation and is currently at public examination.
- 1.2 A number of modifications are being proposed to the Plan. It is important to explore whether these changes will affect sustainability appraisal findings.

Sustainability Appraisal (SA)

1.3 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the East Northamptonshire Local Plan (Part 2). SA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

Purpose and Structure of this SA Report Addendum

- 1.4 The aim of this SA Report Addendum is to present information on the proposed main modifications with a view to informing further consultation and subsequent plan finalisation.
- 1.5 This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published in January 2021 [Exam ref: A-02]. This SA Report Addendum is structured as follows:
 - Section 2 presents the scope of the SA;
 - Section 3 explains the method and presents the findings of the screening of proposed modifications;
 - **Section 4** sets out consideration of alternatives;
 - Section 5 sets out an appraisal of the screened in Modifications;
 - Section 6 considers mitigation and enhancement; and
 - Section 7 discusses the next steps.

2. What's the scope of the SA?

The SA Framework

2.1 The scope of the SA work, with respect to the East Northamptonshire Local Plan (Part 2), is introduced within the SA Report published in 2021 [Exam ref: A-02]. The scope is reflected in a list of sustainability objectives and supporting 'guiding criteria', which collectively provide a methodological 'framework' for appraisal.

2.2 The SA Objectives and guiding criteria are listed below in Table 1.2 It has not been necessary to update or revise the SA framework for the purposes of appraisal work at this stage.

Table 1.2: The SA Framework

SA Objective

Guiding criteria (will the proposal...)

Accessibility

To improve accessibility and transport links from residential areas to key services, facilities and employment areas, and enhance access to the natural environment and recreation opportunities

- Improve access for the disabled?
- Improve access to public transport?
- Improve public transport services?
- Improve access to local services and facilities?
- Improve access to IT/ high speed Broadband?
- Improve access by foot or cycle?
- Ensure services are located to maintain the viability of settlements?
- Reduce the need to travel?
- Reduce travel distances (particularly journey to work)?
- Help to support the viability of facilities and services in rural areas?
- Improve access to services for rural communities?

Housing

Ensure that new housing provided meets the needs of the area, provide affordable and decent housing for all

- Reduce homelessness?
- Provide enough affordable housing to meet need from all sections of the community?
- Reduce the number of unfit homes?
- Provide housing to meet local needs in the rural area?
- Provide a range of house types and sizes?
- Facilitate provision of new homes in communities with sense of place and adequate access to facilities?
- Facilitate provision of new homes which are easy to maintain and heat and which minimise the impact on the environment?

Health

Improve overall
levels of physical,
mental and social
well-being, and
reduce disparities
between different
groups and different
areas

• Address he
• Encourage
• Improve spr
• Improve acr
• Increase nu
open space?

- Address health and welfare needs and inequalities in the area?
- Encourage healthy lifestyles (including travel choices)?
- Improve sporting or recreational facilities and access to them?
- Improve access to high quality health facilities?
- Increase number of people in urban areas with access to public open space?

Crime

To improve community safety, reduce the incidences of crime and the fear of crime - a safe place to live

- Reduce incidences of crime?
- Reduce the fear of crime?
- Ensure design and layout minimises the opportunity for crime?
- Involve the community in control of their local area?

SA Objective

Guiding criteria (will the proposal...)

Community

Value and nurture a sense of belonging in a cohesive and vibrant community, whilst respecting diversity.

- Increase the ability of people to influence decisions?
- Improve cultural diversity?
- Create or sustain a vibrant community?
- Encourage engagement in community activities?
- Meet specific needs of a section of the community?
- Will it maintain and enhance community facilities and provide locations for community level activities and organisations?

Skills

To improve overall levels of education and skills.

- Improve access to educational/learning or training facilities for all ages and social groups?
- Will it help to improve people's skills?
- Will it improve uptake of learning and training in urban and rural areas?

Liveability

To create healthy, clean and pleasant environments for people to enjoy living, working and recreating in and to protect and enhance residential amenity

- Reduce noise pollution?
- Improve the cleanliness of the environment?
- Reduce unpleasant odours?
- Improve the satisfaction of people with their neighbourhoods?
- And improve /safeguard tranquillity?
- Minimise light pollution or reduce or remove light pollution?
- protect and enhance Enable effective connection between developments and Greenway residential amenity proposals

Biodiversity

To protect, conserve and enhance biodiversity, geodiversity, wildlife habitats and green infrastructure to achieve a net gain and to avoid habitat fragmentation

- Protect and enhance sites of acknowledged importance for wildlife (SSSIs, CWS, LNRs)?
- Avoid harm to and enhance opportunities for protected species and others listed in the Northamptonshire Red Data Book?
- Create habitats of value for wildlife in particular those which meet BAP target?
- Improve the connectivity of green spaces and green networks?
- Improve appropriate access to natural areas?
- Avoid fragmentation of habitats?
- Create new greenspace networks?
- Improve management of habitats?
- Will it allow biodiversity to adapt to the impacts of climate change?

Landscape

To protect and enhance the quality, character and local distinctiveness of the natural and cultural landscape and the built environment.

- Ensure that landscape character, including historic landscape character, and townscape assessments are used to assess the capacity of areas to absorb new development thereby influencing the location and scale of development?
- Ensure landscape Character Assessment influences design of the built environment and networks of green infrastructure?
- Maintain and enhance the quality of the built environment?
- Protect, maintain, enhance and expand good quality of open space within and adjacent to settlements?

SA Objective

Guiding criteria (will the proposal...)

- Create buildings and spaces that are attractive, functional, adaptable and durable that compliment, enhance and support local character?
- Encourage the re-use of and refurbishment of the existing built environment?
- Protect and maintain levels of tranquillity?

Cultural Heritage

Protect and enhance sites, features and areas of historical, archaeological, architectural and artistic interest and their settings

- Protect and enhance sites, features and areas of historical, archaeological and cultural value and their setting?
- Protect and enhance sites of geological value?
- Help to provide solutions for heritage at risk?

Climate change

Reduce the emissions of greenhouse gases and impact of climate change (adaptation)

- Reduce emissions of greenhouse gases?
- Increase tree cover?
- Ensure adaptability of environments and buildings to natural hazards?
- Promote resource efficient buildings?
- Encourage innovation in sustainable design and construction?
- Support rural communities to reduce reliance on oil heating?
- Encourage the use of sustainable technologies and practices in agriculture?

Air quality

To maintain or improve local air quality

- Reduce traffic related pollution?
- Minimise or reduce light pollution?
- Reduce levels of dust or particulates?
- Support the use of green infrastructure to help improve environmental quality?

Water

Maintain or improve the quality of ground and surface water resources and minimise the demand for water

- Minimise or reduce the risk of pollution to water, and enhance water quality in areas of poor quality?
- Encourage water efficiency?
- Will it reduce levels of pollution to water (utilising SUDS)?
- Reduce water consumption?
- Ensure capacity of available water resources, taking into account climate change?

Natural Hazard

Reduce the impact of flooding and avoid additional risk

- Reduce the risk of/effects of flooding, taking into account climate change?
- Encourage Sustainable Drainage Systems?
- Ensure adaptability of environments and buildings to natural hazards?

SA Objective

Guiding criteria (will the proposal...)

Soil and Land

Ensure the efficient use of land and maintain the resource of productive soil

- Maintain the best and most versatile agricultural land?
- Reduce the risk of land contamination?
- Remediate contaminated land?
- Minimise the loss of green field land?
- Maximise the use of Brownfield land?
- Maximise development densities where appropriate?

Minerals

Ensure the efficient use of minerals and primary resources

- Avoid the sterilisation of known minerals reserves?
- Promote the appropriate use of primary and secondary aggregates?
- Will it make use of previously developed land or buildings?

Energy use

To mitigate climate change by minimising carbon based energy usage by increasing energy efficiency and to develop North Northamptonshire 's renewable energy resource, reducing dependency on nonrenewable resources

- Minimise or reduce energy use?
- based energy usage Promote energy efficient buildings?
 - Help develop the areas renewable energy resource?
 - Reduce the dependency on non-renewable resources?
 - Encourage the development of renewable energy generation schemes (e.g. Wind)? Encourage community heating schemes or combined heat and power?
 - Encourage small scale schemes in developments (e.g. Solar)?

Waste

To reduce waste arisings and increase reuse, recycling and composting

- Promote resource efficient buildings?
- Encourage the use of recycled materials?
- Reduce the production of waste?

Employment

Maintain and enhance employment opportunities and to reduce the disparities arising from unequal access to jobs

- Provide new jobs?
- Encourage efficient patterns of movement?
- Increase the proportion of knowledge based and high tech businesses?
- Sustain and promote jobs in urban and rural areas?
- opportunities and to Increase the diversity and quality of employment opportunities in the reduce the rural area
 - Utilise and enhance the existing infrastructure?
 - Help maintain a transport network that minimises the impact on the environment?
 - Help sustain existing businesses?

SA Objective Guiding criteria (will the proposal...)

Wealth Creation

Retain and enhance the factors which are conducive to wealth creation, including infrastructure and the local strengths and qualities that are attractive to visitors and investors

- Encourage enterprise and innovation?
- Exploit opportunities for new technologies?
- Enhance and promote the image of the area as a business and a sustainable tourist location?
- Improve House price/earnings ratio?
- Provide enhanced support for new businesses?

Town Centres

Protect and enhance the vitality and viability of town centres and market towns

- Retain and develop a wide range of uses, attractions and amenities?
- Ensure good accessibility to and within centres?
- Attract continuing investment in development or refurbishment?
- Encourage the evening economy?
- Encourage increased housing in centres?
- Encourage increased visitors through support for tourism, culture and sport?

3. Screening of Proposed Modifications

Introduction

3.1 A number of 'additional' and Main Modifications to the submitted Local Plan are proposed as a result of the examination hearing sessions and representations received. It is necessary to screen these modifications to determine if they could significantly affect previous SA findings and if further appraisal work is therefore required.

Method

- 3.2 All of the proposed Main Modifications were screened to determine if further SA work was required or if they could be screened out from appraisal. The findings of the screening exercise, including the rationale for why a modification was screened in or out, are provided in Appendix 1.
- 3.3 The majority of modifications involve minor edits to the Plan text for clarification, factual correction, to enhance readability or other minor reasons and have therefore been screened out as not being significant in terms of requiring further exploration through the SA (i.e. they would be inherently unlikely to give rise to significant effects).
- 3.4 Where modifications are identified as potentially giving rise to significant effects, then additional appraisal work has been undertaken.

Screening Findings

- 3.5 The screening of the proposed Main Modifications (**Appendix 1**) found that the majority of modifications would not be likely to have a significant effect on the findings of the previous SA work presented in the SA Report (2021) [Exam ref: A-02]. This is because the changes do not fundamentally alter the thrust of the policies when considering the Plan 'as a whole'.
- 3.6 Several modifications have been identified as requiring further consideration through the SA process. These are as follows:

MM17 – Amendments to Policy EN7 (Local Green Infrastructure Corridors)

3.7 The policy is clearer in terms of the role of local GI corridors and how they link to strategic corridors.

MM27 – Amendments to Policy EN13 (Design of Buildings / Extensions)

3.8 The policy no longer references electric charging infrastructure.

HRA Related amendments (MM50, MM57, MM77)

3.9 Several modifications have been made in response to recommendations within the HRA and through dialogue with Natural England. Though individually these changes are unlikely to have a significant effect on findings, it is useful to test whether there could be cumulative effects.

MM34 - Policy EN17 deleted

3.10 The site (Land south of Chelveston Road, Higham-Ferrers) has planning permission and therefore, the effects should not be attributed to the Plan.

MM73 - Policy EN37 (Rectory Business Centre Site)

- 3.11 Removal of clause e) relating to education / training and economy.
- 3.12 Provides greater certainty that the any impacts upon heritage assets will be assessed and managed.

MM87 - Monitoring

3.13 Updates to monitoring indicators may be useful to reflect the latest iteration of the Local Plan.

Appraising modifications

- 3.14 Each of the modifications that have been 'screened-in' have been considered in further detail; covering the following elements:
 - Consideration of reasonable alternative approaches
 - Appraisal against the SA framework
 - Potential for mitigation / enhancement
 - Monitoring

4. Consideration of alternatives

4.1 For each modification that has been screened-in, the potential for alternative approaches has been considered. This is discussed below.

MM17 – Amendments to Policy EN7 (Local Green Infrastructure Corridors)

4.2 The changes are mostly for clarity and provide additional direction. There are no strategic alternatives to test through the SA process.

MM27 – Amendments to Policy EN13 (Design of Buildings / Extensions)

4.3 The policy change is not a strategic matter and does not lend itself to the testing of reasonable alternatives through the SA process.

HRA Related amendments (MM50, MM57, MM77)

4.4 The changes are mostly for clarity and to respond to recommendations in the HRA. There are no strategic alternatives to test through the SA process.

MM34 - Policy EN17 deleted

4.5 The site (Land south of Chelveston Road, Higham-Ferrers) has planning permission. There are no alternatives to consider

MM73 - Policy EN37 (Rectory Business Centre Site)

4.6 Amendments to the policy relate to specific issues (heritage and education / skills). There are no strategic alternatives to test through the SA process.

MM87 – Monitoring

4.7 Updates to monitoring indicators do not require alternatives to be tested.

5. Appraisal of the modifications

5.1 The Main Modifications that are 'screened-in' have been appraised in further detail against the full SA Framework. The results are presented below under each modification and then cumulatively.

MM17 - Amendments to Policy EN7 (Local Green Infrastructure Corridors)

5.2 The modifications add clarity and detail in relation to the role of local green infrastructure corridors, and that these are complementary to strategic corridors. The changes are likely to be positive in relation to biodiversity, with knock on benefits in terms of health and wellbeing. However, the significance of effects are not anticipated to be different, given that no new requirements have been introduced.

MM27 – Amendments to Policy EN13 (Design of Buildings / Extensions)

- 5.3 The modification removes reference to parking and electric vehicle charging in this policy. This has some effects in terms of air quality, health / liveability.
- 5.4 Positive effects on air quality are likely to be slightly lowered, as there is no longer any specific mention of the need to encourage electric vehicle charging infrastructure in the Part 2 Local Plan or the Joint Core Strategy (JCS). This has knock on implications in terms of health and wellbeing (i.e. positive effects associated with cleaner air are reduced in this respect).
- 5.5 The Local Plan Part 2 is predicted to have minor positive effects with regards to air quality, mainly related to the strategy for growth encouraging sustainable modes of travel and less need to travel. Minor positive effects are still recorded despite the modification MM27, though the policy is less proactive on this front.

HRA Related amendments (MM50, MM57, MM77)

5.6 The changes are mainly made to clarify which developments are likely to require a HRA, and outlines the need to consider functionally linked land amongst other factors. Together, the modifications are considered unlikely to have a significant effect on any of the SA Objectives. The key requirements in relation to HRA are already established in the Joint Core Strategy and the Special Protection Area Supplementary Planning Document. Therefore, whilst clarifications in the Local Plan (Part 2) are likely to be helpful, they do not alter the overall findings for biodiversity (they remain minor positive overall with regards to the biodiversity SA Objective).

MM34 - Policy EN17 deleted

- 5.7 This site (Land south of Chelveston Road, Higham–Ferrers) has planning permission, and therefore, effects associated with this as an allocation are not attributable to the Local Plan as such (i.e. this site now forms a part of the baseline position).
- 5.8 The allocation of the site was predicted to have significant positive effects in relation to education and skills objectives, whilst also contributing towards significant positive effects in terms of accessibility, and health and liveability (through the provision of new open space, green infrastructure and education / leisure facilities).

- 5.9 The Plan is still likely to have positive effects on health due to the wide range of other policies that support improved health outcomes. Therefore, despite this policy being removed, significant positive effects (i.e. beyond the baseline position which now includes the school site) are still predicted to occur.
- 5.10 With regards to economy, education and skills, the allocation was predicted to have significant positive effects. These will no longer arise as a result of the Plan (instead minor positive effects are recorded), but it should be noted that the baseline position has already been improved in this regard, so the outcomes for communities will be similar.

MM73 - Policy EN37 (Rectory Business Centre Site)

- 5.11 Amendments to policy clauses are predicted to have some minor implications. On one hand, the changes are likely to be positive with regards to cultural heritage, as they provide greater certainty that impacts upon heritage assets will be fully assessed and managed. On the other, the policy is no longer likely to bring about positive effects in relation to economy and skills.
- 5.12 These changes only relate to this one site and are unlikely to lead to significant effects. Therefore, the overall findings for all of the SA objectives remain the same.

MM87 - Monitoring

5.13 Changes to monitoring indicators have no effect upon the SA findings.

Cumulative effects of the Modifications

- 5.14 Several modifications relating to HRA should lead to slight improvements with regards to biodiversity. There is also greater clarity in relation to the role of local green infrastructure corridors. These changes are minor though and do not lead to any changes in relation to the overall findings, which remain as minor positive effects with regards to biodiversity.
- 5.15 Slight improvements are also recorded for the cultural heritage SA Objective reflecting specific changes to Policy EN37 which relates to the Rectory Business Centre site. Whilst this is a positive change, it does not alter the minor positive effects already predicted in the SA Report overall in terms of cultural heritage.
- 5.16 The modifications have no implications with regards to crime, landscape, water, natural hazard, soil and land, minerals, energy use, waste and town centres.
- 5.17 Several modifications are less positive in relation to health and liveability, but they are minor in their coverage. Therefore, the changes will not result in the predicted effects reducing from significantly positive overall.
- 5.18 Several changes mean that the Plan is less positive in terms of skills and education provision. However, this mainly relates to the new school at Higham Ferrers already having planning permission. The significant positive effects attributed to the Plan are now considered to be minor positives. But these should be understood in the context of a stronger baseline position.

Table 5.1: Summary of SA findings

Topic	Overall Findings in the SA Report	Main Modifications	Overall findings post Examination
Accessibility	Significant positive	No change	Significant positive
Housing	Significant positive	No change	Significant positive
Health and liveability	Significant positive	Less positive	Significant positive
Crime	Minor positive	No change	Minor positive
Community	Minor positive	Less positive	Minor positive
Biodiversity	Minor positive	More positive	Minor positive
Landscape	Minor positive Minor negative	No change	Minor positive Minor negative
Cultural heritage	Minor positive	More positive	Minor positive
Air	Minor positive	Less positive	Minor positive
Water	Minor positive Neutral	No change	Minor positive Neutral
Natural hazard	Neutral	No change	Neutral
Soil and land	Neutral	No change	Neutral
Minerals	Neutral	No change	Neutral
Energy use and climate change	Minor positive	No change	Minor positive
Waste	Neutral	No change	Neutral
Employment, wealth creation and skills	Significant positive Minor positive	Less positive	Minor positive
Town centres	Significant positive	No change	Significant positive

6. Mitigation and enhancement

- 6.1 Some modifications have been made in response to minor negative effects being identified, and the changes rectify these issues. In this respect, no further mitigation or enhancement is necessary.
- 6.2 Where changes have led to less positive effects, these are minor and are mostly attributed to the status of site allocations. Therefore, no further mitigation or enhancement is considered appropriate.

7. Next steps

Plan Finalisation

- 7.1 This section explains the next steps in the plan-making/SA process.
- 7.2 Following consultation, the Inspector will consider all representations received, before deciding how to report on the Plan's soundness.
- 7.3 Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

Monitoring

- 7.4 The SA Report [Exam ref: A-02] submitted alongside the Local Plan presented a range of 'measures envisaged concerning monitoring' in Table 9.2.
- 7.5 Updates to the Local Plan monitoring framework have been made that are useful to reflect in the SA Report. The effects with regards to skills and education are now considered to be minor rather than significantly positive. It is considered unnecessary to include measures to monitor these minor effects.
- 7.6 Table 7.1 below reflects these updates. A final list of monitoring measures will be presented within the SA Statement produced once the Local Plan is adopted.

Table 5.1: Potential monitoring measures for significant effects

Significant effects

Potential monitoring indicators

Accessibility

Significant positive effects

through a focus on sustainable locations for growth, sustainable travel and securing a greenway and other GI networks.

• Length of new cycle infrastructure secured.

- Progress on delivery of GI networks and the Greenway.
- % of new developments within 400m from a bus/rail stop.

Housing

Significant positive effects due to meeting JCS targets and providing flexibility

- Annual delivery of housing by settlement compared to targets.
- Proportion of 1, 2, 3, 4, 5+ bed properties.

Health and Liveability Significant positive effects

due to a range of social infrastructure and environmental improvements

- Number of affordable and specialist homes delivered.
- Net change in open space and green infrastructure provision.
- Developer contributions secured for public realm improvements.
- Rates of active travel.
- Number of Category 3 (wheelchair accessible or adaptable) units delivered.

Significant effects

Potential monitoring indicators

Town Centres

Significant positive effects with regards to regeneration and focus on the vitality of town centres.

- Progress on delivery of town centre regeneration sites.
- Number and % of vacant properties in centres.
- 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.

Schedule of Proposed Main Modifications to the Submission Local Plan

Part 2 Local Plan

October 2022



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.

Ref	Para/	Public	Proposed Change	Reason for	SA
No.	Policy/	ation		Change	implications
	Figure/Tabl	Plan			
	e/Map ref	Page			

Introduction

MM1	Para 1.23	18	Amend text to para 1.23 as follows:	For greater	No
				clarity	implications for
			Add the word bodies to second sentence after the words "specific consultation"		SA findings.
			Reword the third sentence to add the words to inform any potential before the	(Action	
			wording "cross boundary issues".	Point 1)	
MM2	Para 1.46	23	Amend paragraphs 1.46 and 1.47 as follows:	To address	No
	and 1.47			comments	implications for
D			1.46 Areas of land located beyond the Upper Nene Valley Gravel Pits SPA/	from	SA findings.
Page			Ramsar site may also be important ecologically in supporting populations for	Natural	_
Эe			which the SPA has been designated, these areas are defined as is also adjoined	England	
			by-Functionally Linked Land (FLL) ²² . FLL is adjacent or nearby land that lies outside	(Reps 48/13	
154			the statutory designated SPA/ Ramsar area, but which in practical terms should be	and 48/16)	
4			treated as if it forms an integral part of the SPA/ Ramsar site. For example, iIn 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.		
			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.	
	The SPA/ Ramsar site is also protected by 3 and 4km buffer zones shown on the adopted Policies Map, within which the SPA Mitigation Strategy ²³ 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.	
	Add new paragraph as follows:	
Page	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) quidance ¹ .	
5		

Area Portrait

MM3	Paras 2.10	29	Amend paragraph 2.10 and 2.11 as follows:	Factual	No
	and 2.11			Update	implications for
			Development of the Rushden East sustainable urban extension has been a		SA findings.
			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		

¹ https://www.east-northamptonshire.gov.uk/downloads/file/11094/emaqn aq and planning developer guide - july 2018

masterplan will define the development boundaries and policy expectations for the SUE.	
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). Following the examination of the Plan it was agreed that the MFD would be taken forward as a Supplementary Planning Document supporting Policy EN33.	

Statial Development Strategy

ММ4 55 6	Para 4.14	51	Amend paragraph 4.14 as follows: 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.	To reflect changes to the spatial policies.	No implications for SA findings.
MM5	Para 4.29	56	Amend paragraph 4.29 to reflect changes proposed to policy EN1 as follows:	To reflect changes to	No implications for
			Policy Policies EN1 and EN2 (below) explains how the spatial development strategy	the spatial	SA findings.
			should apply. The policies It provides additional district-level direction to support the	policies.	

 $^{^2\,\}underline{\text{https://www.east-northamptonshire.gov.uk/info/200153/planning and buildings/1881/rushden sustainable urban extension}$

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

			development management process or provides further strategic direction for the preparation of neighbourhood plans.		
Page 157	Policy EN1	56	Amend Policy EN1-as follows: 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) along with local considerations for assessing development proposals set out below and through Policy EN2 and the supporting text. 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. 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 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 (Policy EN28). 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 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	Hearings outcome Action Point 12 Hearings outcome Action Points 13,14, 15	No significant implications for SA findings.
			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. c) Oundle - At Oundle, Ddevelopment will be directed towards delivering the outstanding allocations, Further development proposals, 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), 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.	To address comments from Francis Jackson Homes (Rep 21/01	
Page 158	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.		
	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.		
	Within the eight larger freestanding villages (Table 4) larger scale ⁴ development opportunities may be supported where it can be demonstrated that they are		

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.

Page 1			necessary to fulfil a defined local need. 5 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 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 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. 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 quidance.		
M 7	Para 4.31	58	Amend the sub heading to this section of text at para 4.31 Settlement boundaries- differentiating between built up areas and the countryside Defining Built-up areas	To reflect changes to the spatial policies.	No implications for SA findings.
MM8	Para 4.35	59	Amend paragraph 4.35 as follows: 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 settlement boundary criteria in together with the supporting text to Policy EN2 provide more detailed criteria to support those in the Joint Core Strategy	To reflect changes to the spatial policies.	No implications for SA findings.

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.

MM9	Policy EN2	59	Policy EN2 is deleted in its entirety and replaced with the following policy: Policy EN2 Settlement boundary criteria –urban areas	To reflect changes to the spatial policies.	The interpretation of the built environment /
Page 160			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. 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. 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. 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.		

	Whilst it is recognised that some made Neighbourhood Plans .contain settlement	settlement
	boundaries, infill development will generally be supported in the urban areas, as	boundaries is
	defined by Policy EN1 (1), where it meets the following criteria:	likely to allow
	a) Small in scale, relative to an otherwise built up frontage;	for greater
	b) Well related to the urban area (existing or committed);	flexibility.
	c) Clearly distinct from the countryside physically and visually;	However, the
	d) Bounded by compatible development (existing or committed);	policy still
	e) For land on the periphery of towns, bounded by compatible existing or	seeks to
	committed development on at least two sides, which should be adjoined by a	achieve similar
	road (or other strong and distinct physical feature);	outcomes, so
	f) Unlikely to be of any beneficial use as open land, including for agriculture, or;	the
	g) Committed for development by way of an extant planning permission or	implications for
	development plan allocation.	the SA findings
		are not
	Policy EN2 Development Principles	significant.
	Development proposals will be generally supported where they meet the	
Page	following requirements/criteria:	
16	(i) The site is allocated in the Local Plan or a made Neighbourhood	
0)	<u>Plan;</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:	
	(a) well-related to the principal built-form of the settlement	
	(existing or committed) and is not protected for any other use;	
	existing of committee) and is not protected for any other use,	
	(b) clearly distinct from the surrounding countryside, both	
	physically and visually;	
	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.		
⁵ Page 162	Para 4.39 and 4.40	60	At the freestanding villages, new residential infill development should occur within the existing built up areas, as defined by the Policy EN3 criteria (below) EN2 and the supporting text. 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. Delete para 4.40 in its entirety: 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.	To reflect changes to the spatial policies.	No implications for SA findings.
MM11	Policy EN3	60-61	Delete Policy EN3 in its entirety: Policy EN3 Settlement boundary criteria- freestanding villages (Table5)	To reflect changes to the spatial policies.	Though policy has been deleted, similar principles remain in EN2.

			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:		
			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 excluded:		
			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 excluded:		
			d) residential curtilages, where these are bounded by existing built curtilages on		
			fewer than two sides, are excluded: 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		
			included.		
MM12	Paras 4.41-	61	Delete paras 4.41-4.43 in their entirety	To reflect	No significant
	4.43			changes to	implications for
			4.41 The Avenue Road/ Bedford Road/ Newton Road area of Rushden (population	the spatial	SA findings.
Ρ'n			approximately 600) represents the most significant area of ribbon development. This	policies.	
Pag			lies to the south east of the main Rushden urban area and has a predominantly		
Je			suburban character but is physically detached from the main urban area (lying beyond		
_			the A6 Bypass). Its status was set through the Neighbourhood Plan, which defined		
63			the area as a part of Rushden's rural hinterland. Policy H1 in the Neighbourhood Plan		
3			specifies the relevant development management criteria for this part of Rushden.		
			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:		
			7 toolangly, two cash areas are.		
			 Lower Crow Hill (Addington Road, Irthlingborough); and 		
			Brooks Road, Raunds.		
			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.		
Pa	Policy EN4	61	Policy EN4 Settlement boundary criteria- ribbon developments 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; a) is bounded by existing built curtilages on at least two sides; b) has a frontage to the highway and a depth similar to adjoining residential curtilages c) does not extend the built form away from the main highway to create a "backland" form of development; and d) has regard to positive local character and distinctiveness.	To reflect changes to the spatial policies.	Though policy has been deleted, similar principles remain in EN2.
© 164	Policy EN5	63	Amend Policy EN5 as follows: Policy EN5 3 Development on the periphery of settlements with a defined settlement boundary and rural exceptions housing Beyond the extent of the built up area defined settlement boundaries, as defined in the supporting text to by policies Policy EN2—EN4 (or defined, by a settlement boundary, 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 supported ⁶ . Where it fulfils the relevant development plan policies. 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:	To reflect changes to the spatial policies.	No implications for SA findings.

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.

			 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 		
MM15	Policy EN6	64	Amend Policy EN6 as follows: Policy EN6 4 Replacement Dwellings in the Open Countryside Proposals for new build replacement dwellings in the countryside will be granted where they meet the following criteria:	To reflect changes to the spatial policies.	No implications for SA findings.
Page 165			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 seen 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 to 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	(e)Hearings Action Point 22	

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.

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, taking into account any wider impact of the development in its general location.	(f)Hearings Action Point 23	
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.	Hearings Action Point 24	

Natural Capital

M 16	Supporting text to	68 - 70	Amend second sentence of paragraph 5.12 as follows:	Hearing Action	No implications for
66	Policy EN7 Para 5.12 & Figure 7		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.	Points 142, 146, 147, 150	SA findings.
			Add two new paragraphs after paragraph 5.12 as follows: 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.		

Page 167			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. Amend the Figure 7: Priority Green Infrastructure Corridors Legend as follows: New Suggested Local GI Corridors Amend final sentence of paragraph 5.14 as follows 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. 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.		
MM1 7	Policy EN7	70	Amend EN7 Policy title as follows: Policy EN7: Local Green Infrastructure corridors Amend Policy EN7 as follows:	Hearings Action Point 141, 142, 143, 144, 145, 146	Additional clarity and detail provided should help to consolidate positive effects associated with green

Page 168	Local Green Infrastructure corridors are identified on the Policies Map and Figure 7. These local corridors will be protected and enhanced bythrough development proposals. Development proposals will be expected to: a) Ensureing that, where opportunities exist, new development, including open space, is connected to the Local Green Infrastructure network, this includes the local Gl corridors and the wider Green Infrastructure network;	infrastructure provision.
	b) Ensur <u>eing, 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;</u>	
	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 or 1000m² or more to make on-site provision and/ or pProvideing 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 <u>local</u> 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		
Page 169	Supporting text to Policy EN8 Paras 5.15 – 5.17 & Figure 8	71-73	Amend para 5.15 second sentence as follows: 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. Add new paragraph after paragraph 5.17 as follows: 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. Remove Unsuitable Greenway Routes from Figure 8: The Greenway and amend the Legend as follows: Unsuitable Greenway Routes	To address comment by British Horse Society (Rep 34/01) Hearing Action Points 149, 151, 153	No implications for SA findings.
MM19	Policy EN8	74	Amend Policy EN8 and delete footnote 62, add the text from the footnote to the end of the policy and amend as follows: The Greenway routes, both existing and proposed, as identified on the Policies Map and figure 8-above, comprise is 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.	To address Historic England comments. (Rep. 39/03 and SOCG)	No implications for SA findings.

Page 170	Policy EN9	75	a. be designed to protect and enhance the Greenway, and to strengthen connections to the wider green infrastructure network within the District.; b. Its development must 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 or 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 ENT. 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. 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. Developers should work with the Council to determine the most appropriate future maintenance arrangements. Footnote 62: 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 Amend Policy EN9 as follows:	For greater clarity Hearing Action Point 152, 153, 155	No
	,	-	, and the second	Action	implications for
			Policy EN9: Designation of Local Green Space	Points 157,	SA findings.

			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 a 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 iii) Recreational importance iv) Tranquillity, or v) biodiversity; and vi) beauty; and	158, 159, 160	
Page 17			c) The gross area of the site does not exceed 0.5 ha or 10% of the should be proportionate to the existing main built up area of the settlement, whichever is larger, and not an extensive tract of land.		
7 MM21	Para 5.25 - 5.31	76 - 78	Amend Para 5.25 amend second to last sentence and delete the last sentence (including footnote 65) as follows: 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 or any subsequent updates). The KKP study should also be utilised in conjunction with other targeted investment strategies such as the Local Football Facility Plan (March 2020). Amend paragraph 5.30 as follows: 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 0.35 ha or more for housing schemes will be	To address Sport England comments. (Rep. 20/01) To address issues raised by Bellway Homes (Rep 26/02)	No implications for SA findings.

Page 172	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 wwhere 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. Amend paragraph 5.31 as follows: 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 through Policy EN33 and informed by 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). Add two new paragraphs after paragraph 5.31 as follows: 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. 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. Amend footnote 69 as follows:	Hearing Action Points 163, 164, 165, 166			
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			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.		
MM22	Policy EN10	79	Amend Policy EN10 as follows: With the exception of the Rushden East Sustainable Urban Extension, <u>aAII</u> new residential development of 10 or more dwellings (or sites more than 0.3 <u>5</u> ha) will be required to contribute to the enhancement and provision of open	To address Bellway Homes comment. (Rep. 26/02	No implications for SA findings.
			space to meet the needs of the population arising from the development.	and SOCG)	
Page			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 insufficient access to existing open space identified within the local area ⁷⁰ . 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):	Hearing Action Points 161, 162, 167, 168	
173			 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 EN33, via the Masterplan Framework Document for that development (Appendix 6).		
			For all other qualifying development, contributions to enhance the quality and value of existing open space <u>onsite</u> , <u>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.		

			by the relevance Developers of long term management Delete footno 'Local' is define Councils for relations."	nis will be delicant Town/ Parists Should work of the should work of the should work of the should be shou	vered by way of eithesh Council, or the settinwith the Council to do maintenance arranges: s: area; a reflection of the ir stock of public open	responsibilities of Tow spaces	en space company. propriate		
Page 174	Supporting text to Policy EN11 paras 5.32 to 5.36	EN11 5.32	Sport and Re Delete figure Figure 9: Pla	ecreation 9, footnote 71 ying Pitch Str KKP Playing F	e paragraph 5.32 as fol and heading as follows rategy and Action Pla Pitch Assessment, Figu	s: n – North and South a	ireas ⁷²	Hearing Action Points 169, 170, 173	No implications for SA findings.
			Table 9: Play	ring pitch den					
			facility	area	shortfall	shortfall	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		

		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	2-youth (9v9) pitches 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	-	-	
Page	Rugby pitches	North	4.5 senior match sessions 3 mini match sessions	_	2.25 senior pitches 1.5 mini pitches	
175		South	5 senior match sessions	-	2.5 senior pitches	
	Hockey (sand AGPs)	Districtwide	Demand being met	-	-	
	Cricket	North	Demand being met	-	-	
	pitches	South	2 match sessions	5 match sessions	3.5 pitches	
	Tennis courts	Districtwide	Demand being met	-	-	
	Bowling greens	Districtwide	Demand being met	-	-	

Page 17			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 enhancement of sport and recreation facilities playing pitches or make provision for these on site. Add new paragraph after 5.36 as follows: 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.		
M 24	Policy EN11	84	Amend Policy EN11 as follows:	Hearing Action Points 171, 172, 173, 174, 175, 176	No implications for SA findings.

For aAII 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, contributions to enhance the quality and value of existing sports and recreation facilities playing pitches within the locality and/or create new facilities to meet needs arising from the development. 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. most up-to-date evidence base.

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

New strategic development for employment and housing will be required to contribute to the provision of playing pitches to meet the need arising from the development. Preference will be to meet that need through new onsite provision, though off-site provision and enhancement of existing facilities will be considered, where a need for such an approach can be fully justified 73.

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.

Playing pitches, sports or recreational facilities will be provided for strategic development, in accordance with the accessibility standards set out in Table 7 (above).

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.

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

Page 177

	Delete footnote 73 as follows:	
	Strategic development sites are defined in the Joint Core Strategy as developments of	
	500 or more dwellings/ 5ha or more of employment uses	

Social Capital

Page 178	Paras 6.10- 6.11	87	Amend para 6.10 (6 th bullet point), as follows: 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. Amend paragraph 6.11 as follows: A range of good practice exists in regard to designing for good health and wellbeing. Three documents are cited as particularly useful references ⁷⁵ . 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 applications/ proposals to be prepared in line with the latest EMAQN guidance [link to document already provided at section 1].	To address comments by the National Trust (Rep 27/01) and British Horse Society (Rep 34/03) To address comments from Natural England (Rep 48/15)	No implications for SA findings.
MM26	EN12	88	Amend Policy EN12 as follows: Policy EN12: 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:	Hearings Action Points 122, 123, 124, 125, 126, 127	No implications for SA findings.

			-\ Fff-th		
			a) Effective application of the design and 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;		
			b) Creating a distinctive, high quality and accessible public realm which promotes		
			and encourages physical activity and social engagement;		
			c) Giving due consideration 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 in the design process, for example, through pre-application advice, to		
			ensure that the issues identified can be addressed or incorporated into the design		
			proposals, in accordance with and have regard to the Northamptonshire Planning		
			and Health Protocol.		
Page			Health Impact Assessments will need to be objective and proportionate, dependent		
<u> </u>			upon the scale of development proposed ⁷⁸ . In line with the Northamptonshire		
je			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		
17			development of 1000m ² or more) will need to be accompanied by an appropriate		
9			HIA.		
			Delete footnote 78 as follows:		
			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	Amend Policy EN13 as follows:	Hearings	No reference
1	. 3, 2		,	Action	to charging
			Policy EN13: Design of Buildings/ Extensions	Points	points is
			Land Land Land Ballanings Extendions	128, 129,	provided,
			Development proposals should relate well to and where possible enhance the	130, 131	which is less
			surrounding environment, and will be supported where the design:	.55, .5.	positive in
			Sarrounding Sittlictificity and will be supported whole the design.		poolitivo III
			1	l	

			a)	Integrates positively with the surrounding area and creates a continuity of street frontage in terms of appearance, layout, massing and scale;		relation to air quality.
		b) Does not detract from the character of the existing building(s);	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</u> to the scale of the unit of an adequate size for the property and space for waste management to serve the needs of all end users;		
Page 18			f)	In the case of Houses in Multiple Occupation, complies have regard to 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;		
180			g)	For all other developments, meets the provide sufficient internal space in line with National Space Standards as referred to in Criterion (b) of Policy 30 of the Joint Core Strategy; and	Totaldana	
			h)	Includes parking provision in line with the Countywide parking standards and, where appropriate, incorporates changing points for electric vehicles; and where appropriate, incorporates changing charging points for electric vehicles; and	To address Bellway comment (Rep. 26/03 SOCG)	
			i)	Does not result in unacceptable problems of <u>significant harm arising</u> <u>from</u> light pollution.		
MM28	Policy EN14	93	Amend Po	olicy EN14 as follows:	Hearings Action Points	No implications for SA findings.

	the state of repair of a not a building, site or Delete table 10 as fold to be a side of the state of repair of a not a building, site or a side of the state of repair of a not a building, site or a side of the state of repair of a not a building, site or a side of repair of a not a building, site of a not a building, site of a not a building, site or a not a building, site or a building or	ciding whether a building/ site/ structure should be signated heritage asset	
	pe of asset	Criteria for selection	
	toric parks and	Historic interest	
	'dens	Proportion of the original layout still in evidence	
		 Influence on the development of taste whether 	
		through reputation or reference in literature	
70		Early or representative of a style of layout	
Page		Work of a designer of local importance	
$\frac{\alpha}{2}$		Association with significant persons or historical	
<u>→</u>		events	
		Strong group value Mithing or contribution to a locally classificant.	
82		Within, or contributing to, a locally significant landscape	
	ldings and structures	Aesthetic/architectural merit	
		 Historic association 	
		◆ Age and rarity	
		Completeness	
		Social or communal value	
	sets of archaeological	This Plan will follow the clarification provided by the Planning	
	rest	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	Amend Policy EN15 as follows:	To address	Greater clarity
			Davidania de fractione de designata de mita de casa 400 (This malatas ta all malacant	comments	provided in
			Development affecting a non-designated heritage asset (This relates to all relevant	from the	relation to
			heritage assets buildings or structures, not just those on a local list, i.e. non-	National	protection for
			designated historic parks and gardens; buildings and structures; and/ or	Trust	non-
			archaeological remains) where it is designed sympathetically having regard to the	(Rep 27/01)	designated
			significance of the asset, its features, character and setting will be supported.		heritage
			Development should seek to enhance the character of the non-designated heritage	Hearings	assets. Whilst
			asset whether or not it is included in a local list.	Action	positive,
			The	Points135,	unlikely to
			The assessment for proposals for the demolition or total loss of a non-designated	136	significantly
			heritage asset will take into account the significance of the asset and the scale of ham		affect SA
			or loss.		findings.
			Non-designated heritage assets should be conserved in a manner consistent		
			with their significance. The assessment of proposals for new development that		
Ŋ			would impact on the demolition or total loss of a non-designated heritage asset		
Page			will take into account the significance of the asset and the scale of harm or loss.		
$\frac{1}{2}$			Whether a site, feature or structure is considered to be a non-designated heritage		
83			asset will be guided by the criteria set out in Table 10. Table 10:		
			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		

Page			Buildings and structures Aesthetic/architectural merit Historic association Age and rarity Completeness Social or communal value Assets of archaeological interest This Plan will follow tThe 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 will be used. These non-designated sites may be included in the Northamptonshire Historic Environment Record. Delete footnote 90 as follows: 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.		
4 M31 84	Para 6.49	99	Amend para 6.49 by adding an additional sentence after the first sentence as follows: Policy EN16 a) sets out the 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. Add new text after paragraph 6.49 as follows: 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	To address comments from Natural England (Rep 48/05) To address recommend ations of the HRA.	Adds clarity with regards to HRA requirements. No significant implications for SA findings though.

			replacement or update to that policy. A Habitats Regulations Assessment may	Hearings	
			be required to accompany any planning application to demonstrate the absence of any such adverse effect.	Action Point 138	
			of any such adverse effect.	130	
Page 185	Policy EN16	99-100	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. 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)). 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	Hearings Action Point 137	Policy requirements have been moved to supporting text. No significant implications for SA findings.
			of dwellings or redundant or disused rural buildings to guest house or bed		

Pa			and breakfast use will be supported, where this fulfils the following criteria, whereby: i) Special regard shall be given to parking provision and the impact upon the amenity of neighbouring properties; ii) Nnew-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. 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 accommodation. 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.		
age			these are retained for tourist accommodation.		
MM33 80 60	Paras 6.53 to 6.57, Figure 11 and 12	101- 103	Delete subheading below paragraph 6.52 as follows: New school proposal, Chelveston Road, Higham Ferrers	Hearings Action Points 139 & 140	No implications for SA findings.
			Amend paragraph 6.53 as follows:		
			The Government (DfE) has considered Rushden's Growth Town status and the Rushden East allocation (Joint Core Strategy, Policy 33), initially putting forward proposals through the draft Plan consultation, November 2018 – February 2019 (Specialist School Site consultation paper, January 2020 ⁵). 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-been-would-be addressed by the development of a new Free School to the south of Chelveston Road,		

	Delete paragraphs 6.54 to 6.56 as follows:
	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).
Page	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.
187	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.
	Delete figure 11 and title as follows:
	Figure 11: Sports Masterplan, Newton Road, Higham Ferrers (Planning Policy Committee, 20 January 2020, Item 6, Appendix 3)
	Delete paragraph 6.57 as follows:

			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 development of new community facilities (including education) where appropriate (Policy HF.CD2). Delete Figure 12 and title as follows: Figure 12: Land to the west of Moulton College, Higham Ferrers		
MPage 188	Policy EN17	104	Delete Policy EN17: Land south of Chelveston Road, Higham Ferrers 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: 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	Site has permission and therefore effects associated with this allocation no longer relate to the Plan.

1		

Economic Prosperity

MM35	Para 7.17	110	Add the word "target" into the third sentence as follows:sets an overall requirement for a net growth target of 7,200 jobs	To clarify the context of job provision in line with the Joint Core Strategy Hearings Action Point 77	No implications for SA findings.
© 189	Supporting text to Policy EN18 Para 7.34	115	Add two new paragraphs of text after paragraph 7.34 as follows: 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. 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.	To address comments from Natural England (Rep 48/06) To address recommend ations of the HRA. For consistency with Hearings Action Point 138	No implications for SA findings.

				Hearing Action Point 82	
MM37	Policy EN18	115- 116	Amend Policy EN18 title to add the following words:	Hearings Action Point	No implications for
		110	Development of commercial space to support economic growth <u>for Small and Medium-sized enterprises</u>	80,81	SA findings.
			Amend Policy EN18 as follows:		
			Future pProposals 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:		
Page			 a) Provide a range of unit sizes to meet demand across the whole business pipeline; 		
e 190			b) Provide for adequate parking, in line with the Northamptonshire Parking Standards ¹¹³ , ;		
0			 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	Amend Policy EN19 as follows:	Hearings	No
			The existing employment sites, as shown on the Policies Map, are protected for employment use ¹¹⁷ . Proposals for re-development or changes of use of existing	Action Point 83	implications for SA findings.
			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	To address comments	

			 level of employment 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 purposes¹¹⁸; and/or 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 c) Development contributions will be made to support economic development across the district. 	from Crown Estate (Reps 44/04 and 44/05) Additional policy amendment s Hearings Action Points 84, 85	
Page 191	Supporting text to Policy EN20 Para 7.49	120	Add new text after para 7.48 as follows: 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.	To address comments from Natural England (Rep 48/07) For consistency with Hearings Action Point 138	No implications for SA findings.
MM40	Policy EN20	120	Amend Policy EN20 as follows: 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., or for businesses that need to relocate, will be supported where they meet the following criteria: 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:	Hearings Action Point 86	No implications for SA findings.

			a) Is adjacent to an existing built up area, provided that and that there is no significant impact on the countryside, or character of the surroundings: ecology, highways, the character of the surroundings-or the amenity of neighbouring properties		
			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:		
			c) Where necessary, is suitable for the provision of HGV or commercial vehicular access to the strategic or classified road network		
			d) b) For main town centre uses, if applicable, meets the requirements of the sequential and impact tests; and		
Page			e) c) Provides maximum accessibility for the workforce by sustainable modes of transport such as walking, cycling and public transport.		
М 41	Supporting Text to	121 - 124	Table 13 – amend title of the third column as follows:	To ensure the	No implications for
	Policy EN21		Designated primary shopping area <u>l frontage</u> (since 2012 NPPF)	geographic al	SA findings.
			Add new text after para 7.56:	application is illustrated	
			The town centre boundaries are shown on the policies map. The town centre	on the	
			boundaries effectively function as the primary shopping areas reflecting the	policies	
			relatively small size of the town centres which do not have areas of	map.	
			predominantly leisure, business and town centre uses adjacent to the primary	I I a a mino	
			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	Hearing Action	
			with the NPPF, where town centres do not have a defined Primary Shopping	Points 95,	
			Area, 'edge of centre' will for retail purposes be considered as within 300m from	96	
			the town centre boundary.		

			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.		
Page 193	Policy EN21	124	 Amend Policy EN21 as follows: Development within the town centre boundaries of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds⁸ 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, 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 town centre useUse Class, with the exception of retailing; d) Retaining a predominantly retail offer for the defined primary shopping 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 	To ensure the geographic al application is illustrated on the policies map. Hearing Action Points 87, 90, 91, 92, 93, 96	No implications for SA findings.

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

			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.		
Page 19	Policy EN22	126	Proposals for retail development outside the town centre boundariesprimary shopping areas of the six town centres Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds ⁹ 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 guidance¹0. Failure to demonstrate there will be no significant adverse impact would result in a refusal of planning permission.	To ensure the geographic al application is illustrated on the policies map. Hearings Action Points 97, 98, 99, 100, 101	No implications for SA findings.
M 44	Supporting text to Policy EN23	129	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.	To set out the circumstanc es which may result in the removal of permitted developmen t rights.	No implications for SA findings.

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

MM45	Policy EN23	130	Amend policy EN23 as follows:	To ensure it	No
				is clear that	implications for
			Policy EN23: Development of main town centre uses around the ILocal Centres	the	SA findings.
				geographic	
				al	
				application	
				is illustrated	
				on the	
				policies	
				map.	
				Hearings	
				Action	
				points 102,	
				103,	
				104,105,	
P				106, 107	

Page 196	For Proposals of a scale and type limited to serving the immediate local area, minor development schemes ¹⁴ which are adjoining or closely related to within 200m ¹² of the designated local centres, as set out below and shown on the policies map, will be supported for, there will be a general presumption in favour of 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/ 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 developments rights may be removed where exceptional circumstances are considered to exist.
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 thresholds given in Policy EN21.
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.

Housing Delivery

© M46	Para 8.3	132	Add the following text after paragraph 8.3:	Hearings Action Point	No implications for
19			Paragraph 69 of the NPPF requires that land to accommodate at least 10% of the	34	SA findings.
97			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).		
MM47	Para 8.4	132	Provide a new paragraph after para 8.4 as follows:	In response	No
				to request	implications for
			The National Planning Policy Framework requires that, where appropriate, plans	from	SA findings.
			should set out the anticipated rate of development of specific sites. The	Inspector	
			Housing Trajectory is set out in Appendix 6. The Housing Trajectory		

¹¹ 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.

								plan period wil Joint Core Stra			
MM48	Paras 8.5 to 8.15, inc tables 14 and 15	132 to 136	construction or Raunds, Irthling years of the Pla	gnificant deve having extant gborough, Thr an period (201 oment sites ha	lopment sit t planning p apston, Hi 11- 2019 202 ave also co	permissi gham Fe 2 <u>0</u>). Alou me forw	on) at eac errers and ngside the	ome forward (i.e h of the six town Oundle) during se, a large num are included in	ns (Rushden, the first 8 9 ber of	To update with 2020 monitoring information.	No implications for SA findings.
Page 198			progressed on are now under extension (allow development p	velopment site the basis of the construction coated in the publishes) or under ther major denese sites are 5 as follows:	es to the no ne previous or mostly co revious Loc er construc evelopment	Local Fomplete. cal Plan) ction (lat	Plan (2008 Similarly is also <u>m</u>o er develor e committo	d south of the too Core Spatial Stop , the Thrapston ostly complete (oment phases). ed during the Pla	rategy) and South urban (earlier Within the		
			Location	Site name	Total Capacity	No of units, 2019 2020-2031	Delivery beyond 2031	Plan Document	Status N		

¹³ Planning Policy Committee, 8 June 2020, Agenda Item 10, Appendix 3: https://www.east-northamptonshire.gov.uk/downloads/dow

	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		
Page 199	Irthlingborough	West of Huxlow School/ Irthling- borough West	700	250 200	450 <u>500</u>	N/a - Resolution to grant	Strategic site/ SUE	Comm itment en basis of (flow defun ci) 2008 Core Spatia I Strate g/ JCS Anne x A	
	TOTAL	Major urban extensions	3,500 3,700	1,750	1,750 1950				
		0 1920 , the c	outstandin			ement for the si following eleme			
	Comple	tions, 1 Apr	il 2011 – 3	31 Marc	h 20 19 20	<u>)</u> ;			

	sites), • Major	as at 1 Ap developme sed develo ule).	oril 20 19 2 ent sites opment si	2 0 (20 (Table	1920 Al e 16 5 , a	MR, Housing bove) plus ot	reviously alloca Site Schedule) her emerging AMR Housing	;	
Page 2	able 16: rban areas sidual busing quirement, at 1 April	Housing requirement (2011-31)	Completions 2011-48 <u>19</u>	Completions 2019-49 <u>20</u>	% housing requirement delivered as at 31 March 201920	Commitments (starts and planning permissions) as at 1 April 204 <u>920</u>	Commitments (resolutions to grant, Development Plan allocations, Rushden East) as at 1 April 2049 <u>20</u>	Residual requirement as at 1 April 2049 <u>20</u> (committed sites	
200	rowth Town								
	ushden arket Towns	3,285	953 1,036	83 19	31.5% 32.1%	8 3 175	1,760 <u>1,515</u>	4 <u>1</u> <u>5</u> 4	
	gham	560	358 370	12 <u>4</u>	66.1% 66.8%	4 <u>3</u>	300	-1: -1:	
	hlingborough	1,350	283 320	37 27	23.7% 25.7%	171 149	329 280	5(<u>5</u> 7	
	aunds	1,060	387 662	275 47	62.5% 66.9%	4 66 <u>347</u>	0	•	
	ırapston	680	190 202	12 223	29.7% 62.5%	4 86 260	0		

			384	8	60.8%	7	_	4	176 1 69
	Oundle	645	<u>392</u>	<u>3</u>	<u>61.2%</u>	<u>11</u>	70	1 1	<u>169</u>
	TOTAL	7,580	2,555 2,982	4 <u>27</u> 323	39.3% 43.6%	1,197 <u>945</u>	2,459 <u>2,165</u>		94 <u>2</u> 165
Page 201	Table 16 sl Ferrers, Ra (1,234799 residual reemerging Statement requireme Outstandin dwellings), detail about paragraphs outstanding details about housing Barand par For Rushdeplus outstanding details about housing Barand par For Rushdeplus outstanding by the formula outstanding by the formula outstanding details about housing Barand par For Rushdeplus outstanding by the formula outstanding by t	dwellings) and I dwellings) and I dwellings) and I dwellings) and I dequirement has and brownfield (total 88 dwell onts for the town gresidual hous Irthlingborough thow these residual required these outstanding the sagraph 8.10 as an anding Neighborousing land suppose an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding ousing land suppose the sagraph 8.10 as an outstanding outs	1 April 20 poston are nousing of been in less been les been less been les b	01920 e being comm dentifi oposa e mor iremer d dwel quirem neces for Ru quirem 4. t of ex Plan s East a nent fo entifie	g met, the itments (ed for Ruls identifier than sents have lings) and ents will essary, the shden, linents are extrant plansite allocation anticipate or 426-54 d at specific met, and the short shaden is the shaden in the shaden is the shaden in the shaden is the shaden in the shade	rough housing 1,256563 dwe aunds (4 dwe fied in the 20 ufficient to ac been identified to addressed refore, for this thlingborough set out in the uning permission (560 total double deliver details). Actions (560 total double deliver details). Actions (560 total double deliver deliver details).	Ilings). A minings), but oth 20 Annual Posiddress the hour at Rushden (4:169 dwellings)	nal er ition sing 26 540 Further s the urban urban s; with his 4	

Page

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For Irthlingborough, commitments for 500 429 dwellings are identified within the 2019 2020 housing land supply. A further 207 199 dwellings is included within the housing land supply, consisting of specific brownfield sites and other emerging sites which did not, as at 1 April 2019 2020, have planning permission. These emerging sites reduce the residual requirement to 323-375 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 250-200 (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.

Amend paragraph 8.12 as follows:

A residual requirement for a further 176-169 dwellings at Oundle is identified, where additional strategic land allocations are required to meet this target. This residual figure for 176-169 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 246 239 dwellings¹⁵, as a minimum.

Amend paragraph 8.13 as follows:

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.

Amend Table 17 as follows:

¹⁴ https://www.east-northamptonshire.gov.uk/downloads/file/12110/background_paper_9 - housing_requirements - urban-flink to updated BP9 to be added]

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 246239 dwellings for the latest (20192020) monitoring data.

	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 2011-18 <u>19</u>	-4 6 7 <u>-513</u>
	Rural housing completions 2018 <u>19</u> -19 <u>20</u>	-46 -65
	Extant planning permissions as at 1 April 20192020 (as shown in 20192020 AMR housing site schedule)	-17 [†] -12 4
	Local Plan/ Neighbourhood Plan site allocations (as at 1 April 20192020)	-90 <mark>-136</mark>
	Emerging Neighbourhood Plan site allocations, other emerging rural sites (>4 dwellings), as at 1 April 20192020	- 89 - 58
	RESIDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL 20192020	-43 <u>-76</u>
Page 203	Joint Core Strategy, further rural housing sites will continue to conwindfalls, infilling, Neighbourhood Plan allocations and rural except (Policy 11(2)). Further details about these outstanding requirement updated (2020) rural housing Background Paper (BP10) ¹⁶ . Amend paragraph 8.15 as follows:	otions schemes nts are set out in the
	The rural housing requirement is already delivered (513-578 dwell (261-260 dwellings); or allocations in Neighbourhood Plans "made 2020 (35 dwellings) and other emerging rural sites (54-58 dwelling Neighbourhood Planning groups have sought indicative Ward or F "targets", to provide a basis for allocating future housing sites in a Plan. This issue is addressed in the updated (2019) NPPF (2021 states that strategic policies should also set out a housing required neighbourhood areas (paragraph 6566) or, at the very least, proving figure if requested by the neighbourhood planning body (paragraph	e" since 1 April 2019 gs). Nevertheless, Parish level housing Neighbourhood update), which ment for designated de an indicative

⁶ https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10 - housing_requirements - rural [Link to updated BP10 to be added]

MM49	Policy EN24	138	Policy EN24 to be deleted in its entirety as follows:	Hearings Action Point	The allocations are still
			Policy EN24: Oundle Housing Allocations	26	included within
			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:		the Plan, as are the key principles.
			i) Land rear of Cemetery, Stoke Doyle Road – around 70 dwellings; ii) Cotterstock Road/ St Peter's Road – around 130 dwellings; and		Therefore, no significant implications for
			iii) St Christopher's Drive – around 100 dwellings.		SA findings.
			Key considerations to be taken into account for each of the sites along with appropriate Local Plan policies are:		
Page			 a) transport impact – including vehicular access points, visibility, pedestrian and cycle links and impact on the existing road network; 		
je 204			 b) amenity – impact of existing uses and operations upon new development, including issues noise, odours and air quality; 		
4			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	139	Add new text after paragraph 8.26, as follows:	To address	Adds clarity in
	text to	and	The site is leasted assessing table 0 flow from the Harry New Yell 20 and 5%	recommend	relation to
	Policy EN25	140	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	ations of the HRA.	HRA requirements.
			planning application. The applicant will be required to provide evidence that the	11101.	roquiromento.

			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 ¹⁷ 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.		
MM51 Pag	Figure 14	140	Amend Figure 14 as follows: Text stating "longer term development potential" and accompanying arrow to be removed from Figure 14.	Hearings Action Point 41	No implications for SA findings.
6 205	Policy EN25 Criterion b)	140	Amend Policy 25 as follows: 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, in line with other policy requirements.	Hearings Action Point 40	No implications for SA findings.

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

MM53 Page 206	Para 8.29	141	 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 14 (above), in order to meet future requirements. Amend para 8.29 to delete the final sentence and replace with the following sentence: 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 matters and other site-specific constraints. And insert a new para as follows: 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. 	To address comments from Anglian Water (Rep 22/05)	No implications for SA findings.
MM54	Policy EN26	143	Amend Policy EN26 criterion d) as follows: Site Specifics	To address comments from Anglian Water (Rep 22/03.	Additional information is beneficial with regards to amenity, but unlikely to

	Land at Cotterstock Road ¹⁸ , 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.	have significant effects in terms of the overall SA findings.
	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.	
Page 207	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). 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).	
	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.	

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

MM55	Policy EN27	145	Amend Policy EN27 as follows:	To address comments	Additional information is
			Site Specifics	from Anglian	beneficial with regards to
			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.	Water (Rep 22/07, 22/08)	amenity, but unlikely to have
Page 208			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.	Hearings Action Point 73	significant effects in terms of the overall SA findings.
			b) The site is well placed to deliver specialist housing, particularly extra care provision to meet older persons' needs. 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.		ge.
			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. Consideration may be given to the provision of an emergency access via Ashton Road.	Hearings	
			 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). 	Action Point 43	
			e) Structural landscaping will be provided for the site boundary, to mitigate the impacts of noise and other pollution from the A605.		

			f) The design and layout should consider the proximity of the foul pumping station ¹⁹ . to reduce the risk of nuisance/ loss of amenity associated with the operation of this. And add footnote: 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		
Page 209	Paras 8.35 to 8.39	145- 146	Amend paragraph 8.35 as follows: 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 AMR ²⁰ , indicates the following: Irthlingborough West – 250200 dwellings, 20267-2031; and Rushden East – 1,200050 dwellings, 20223-2031. Amend paragraph 8.36 as follows:	To update with 2020 monitoring information.	No implications for SA findings.
			The April 201920 trajectories for the two sustainable urban extensions equate to a combined reduction of 8501,050 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		

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.

 $[\]frac{20}{\text{http://www.nnjpdu.org.uk/publications/amr-}2018-19-assessment-of-housing-land-supply-}2019-24/}{\text{authorities-monitoring-report-}19-20/}$

Page 210			trajectories equate to residual shortfalls of 323375 dwellings and 396406 dwellings, for Irthlingborough and Rushden respectively. Amend the final sentence of paragraph 8.38 as follows: 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 201920). Amend paragraph 8.39 as follows: 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 244-247 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 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.)		
MM57	Supporting text to Policy EN28	147- 149	Add new text after paragraph 8.46, as follows: The site is located approximately 3.5km from the Upper Nene Valley Gravel Pits SPA, it is therefore possible it could constitute functionally linked habitat for the SPA. The applicant will be required to provide evidence that the development will not result in an adverse effect on the integrity of Upper Nene Valley Gravel Pits SPA/Ramsar. To achieve this, surveys will be required to determine habitats and current use of the site to determine if it does support a significant population ²¹ of qualifying species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land	To address recommend ations of the HRA.	Supporting text helps to clarify the potential effects and need for a HRA in accordance with Policy 4 of the JCS.

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

			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'		
MM58	Policy EN28	149	Amend Policy EN28 as follows: 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.	To address comments from Bellway Homes (Rep 26/05)	No implications for SA findings.
Page 211			A design led masterplan is to be agreed by the local planning authority as part of the application prcess, which will address all relevant policy requirements. The key principles of the proposed development will deliver the following: a) Up to to to to be agreed by the local planning authority as part of the application prcess, which will address all relevant policy requirements. The key principles of the proposed development will deliver the following: a) Up to to to be agreed by the local planning authority as part of the application prcess, which will address all relevant policy requirements. The key principles of the proposed development will deliver the following:		
			 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); 		
			 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; 		

MM60	Policy EN30	153	Amend Policy EN30 as follows: 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	Hearings Action Point 67	No implications for SA findings.
			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 targetminimum 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.	Action Point 63, 64, 66	developments less likely to include Category 3 Housing. However, this is unlikely to significantly affect the SA findings.
Page 212M59	Policy EN29	150	 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. 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. 	Hearings	Smaller

			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; 		
			 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 Page 213	Supporting text to Policy EN31	156	 Add new supporting text at the end of paragraph 8.71 as follows: 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 		No implications for SA findings.
MM62	Policy EN31	157	Amend Policy En31 as follows: 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	Hearings Action Point 68, 69, 70, 71,72	Could result in slightly less accommodatio n for older people being

	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.		provided, but unlikely to
	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.		affect the overall positive conclusions in terms of
	Larger sites will be expected to deliver a minimum of 10% of housing for older people.		health.
	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:		
Page 214	 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. 	To address comments from Bellway Homes (Rep 26/08)	
	The criteria for site selection and design principles will also need to meet the requirements laid out in Appendix $3\underline{5}$, 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 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 part of a retirement housing scheme and mayinclude communal facilities and on-site management. c) Supported Housing for Older People – Extra Care: SUEs and Strategic Sites 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. Page Allocated sites • St Christopher's Drive, Oundle (EN27), and Hayway, Northampton Road, Rushden²² will, subject to viability, be N supported to deliver specific Extra Care provision _ East of Ferrers School, Higham Ferrers²³ this site could also S 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.

²² Rushden Neighbourhood Plan Policy H2F

²³ Higham Ferrers Neighbourhood Plan Policy HF.H4

			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.		
MM63	Policy EN32	161- 162	Amend Policy EN32 as follows: 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	Hearings Action Point 76 and Post Hearings Letter	No significant implications for SA findings.
Page 216			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 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:		
			 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. 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. 			
M Page 217	Table 21, paras 8.96 – 8.97	163- 164	Amend paragraph 8.93 as follows: The 2019 GTAA estimates that across North Northamptonshire around 25% of travelled households definitely fulfil the planning definition, with a significant number of households undetermined (i.e. insufficient information). At a district level, the GTAA identified possible Gypsy and Traveller households, of which all but 6 are undetermined. Additional further 4 Travelling Showpeople households were identified that meet the national definition. The GTAA (2019) identified no gypsy and traveller households who met the planning definition, 67 undetermined households who may meet the planning definition and households who did not meet the planning definition. Four travelling showpeople households were identified who met the planning definition. Amend table 21 as follows: Table 21: Identifiable needs for Gypsy, Traveller and Travelling Showpeoples' accommodation 2018-2033 No. of identified households in need that meet the planning definition No. of undetermined households in need that may/ may not meet planning definition	da response dtathe natagector's Initial Question IQ5. ning	No significant implications for SA findings.	

	No. of identified households in need that do not meet the planning definition
	TOTAL 28
	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 11 0
	Definition
	Travelling Showpeople
ם	Meet Planning Definition 6 0
	Undetermined <u>0</u> <u>0</u>
	Do not meet Planning 0 0 Definition
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.

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.

Amend paragraph 8.98 as follows:

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 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. 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.

Delivering Sustainable Urban Extensions

Page

N

19

MM65	Para 9.1 –	165-	Amend paragraph 9.1 as follows:	To update	No significant
	9.5	166		with 2020	implications for
			The Joint Core Strategy (Annex A), made provision for the delivery of 2,300 dwellings	monitoring	SA findings.
			(27% of the total requirement for 8.400 dwellings) and accompanying jobs, facilities	information.	
			and services at the two Sustainable Urban Extensions (SUEs) within the District during		
			the Plan period. Trajectories for SUEs in subsequent Authorities' Monitoring Reports		

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(2017 , 2018—and-, 2019²⁴ and 2020) have seen the anticipated delivery at these progressively diminishing; such that as at 1 April 2019-2020 it is currently forecast that just 4,4501,250 dwellings would come forward at the two sites by 2031 (4715% of the total requirement). Table 22 below provides a comparison between the 2016 (Joint Core Strategy adoption) and 20192020 (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, 1,2001,050 (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)

²⁴ http://www.nnjpdu.org.uk/publications/amr-2018-19-assessment-of-housing-land-supply-2019-24/

			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. Add new paragraph after paragraph 9.7: 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	
M Page 221	Policy EN33	168- 169	required for the Rushden East Sustainable Urban Extension. Amend Policy EN33 as follows: 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, above identifies the development boundaries for the delivery of the Rushden East Sustainable Urban Extension (SUE). This development, also known as High Hayden Garden Community, 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 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.	Substantial detail is added in relation to the principles for development, which should help ensure that the development achieves
			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). 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	sustainability objectives. However, the principle of development at this site is already established in the JCS. Significant

			,	
		nt policy expectations and guidance set out in the MFD. The MFD accords with		implications for
		opted Joint Core Strategy Policy 33 to site to inform future planning		the SA findings
		ations and will ensure a comprehensive approach to site delivery. forms		are unlikely.
		the Local Plan and is set out as an appendix to that document. The MFD		
	provide	es a spatial development context for the delivery of the site. This is designed to		
	inform	future planning applications Planning applications will be required to be		
	broad	ly consistent with the MFD and the principles of the Government's Garden		
	Comm	nunities initiative.		
	Propo	osals for development will be granted planning permission where they are		
		tent with the relevant policy expectations and guidance set out in the MFD		
		below. Further detailed guidance and illustration on how these policy		
		tations might be met is set out in the MFD The MFD accords with the		
	adopte	ed Joint Core Strategy Policy 33 to ensure a comprehensive approach to site		
D	deliver	y.		
age				
	Econo	omic:		
222	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.		
		<u>ontonon or</u>		
	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 shown on Figures 2.3 and 2.38 in the MFD, 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
Page	 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
je 223	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
	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 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.
	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	
		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.
D	<u>En</u>	nvironmental:
Page	12.	Provide a sensitively designed environment incorporating:
Φ		A network of green corridors and public open appears including a
224		A network of green corridors and public open spaces, including a central green corridor, within and around the SUE, and landscaped
4		edges in line with Figure 2.2 of the MFD.
		eages in line with Figure 2.2 of the MFD.
		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.
Page 2	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.
225	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. <u>Provision of a new Town Park (of approximately 3.6ha).</u>
	14. Provision of formal, and informal open space, and sports pitches (including ancillary facilities) in accordance with MFD Figure 2.4.and

Page 226	guidance contained in the Council's KKP Open space and Playing Pitch Strategy 2017 15. Provision of a Cemetery (approximately 2ha) with access, parking and relevant supporting infrastructure in line with MFD Figure 2.2. 16. Provision of allotments in the northern and southern neighbourhoods (approximately 2.20ha) in line with MFD Figure 2.2. 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 EN29-EN32, 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, (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

	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.		
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Town Strategies

MM67	Para 10.10	174	Amend para 10.10, 2 nd sentence as follows: Policy EN34 sets out a framework for assessing development opportunities within and around the wider town centres, as and when these arise.	Hearings Action Point 109, 110	No significant implications for SA findings.
M Page 227	Policy EN34	174	Amend Policy EN34 as follows: 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: a) Maintain a mixture of uses that attract visitors and encourage greater social interaction, including both economic, social and, in some circumstances, residential, uses;		No significant implications for SA findings.
			 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; 		

			to residentia f) Encouraging sustainable measures in Development oppor	decements to pedestrian connectivity both within all and employment areas beyond; and go a step change in the quality of urban development with a focus on low carbon energy accluding green initiatives such as urban tree plan tunities will be informed by the preparation of toward out through development briefs.	design, providing solutions, through ting.	
MM69 Page	Table 24	176	Remove third colu Spatial parts of Rushden	mn of Table 24 as follows: Characteristics	Relevant spatial	No significant implications for SA findings.
ge 228			and Higham Ferrers Core urban area	 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 	Policy EN1(1) (a); JCS Policy 11(1)(a)	

		 Character defined main public open spaces – Rushden Hall Park, Spencer Park 		
Page	Rushden West (employment area)	 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)	
ge 229	Rushden East (Sustainable Urban Extension)	 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 	Policy EN1(1) (a); JCS Policy 33	
	Avenue Road/ Bedford Road/ Newton Road	 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) 	JCS Policy 11(2) (a) Neighbourhood Plan Policy H1	

			Higham Ferrers	 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 	Policy EN1(1) (a); JCS Policy 11(1)(b)		
Page 230	Policy EN35	180	associated highware above, on the Policy viability for the town to encourage the the shop' residen. Whilst it is envisage phases, the two mainformed by a comfollowing principles.	oposals for the Splash Pool and Wilkinson sites the specific proposals for the Splash Pool and Wilkinson sites the specific proposals for the Splash Pool and area of opportunity prices Map-should deliver increased footfall and enforcement. In the would comprise 'town centre uses' to consider the considering of the leisure and growth of both day and night-time economies that opportunities. In the development of this key centre site could be components (Wilkinsons and the Splash Pool prehensive development brief, which takes into a site of a pedestrian link between the High Street and the splash street and th	y in figure 21 hanced vitality and colidate and d cultural offering and offer 'above Id be delivered in) should be account the	Hearings Action Point 113, 114, 115 To address comments from Historic England (SOCG) (e) (Rep 39/08) and Anglian	Provides greater certainty that the any impacts upon heritage assets will be assessed and managed. However, this is unlikely to have a significant effect on the overall SA findings.

⁵ MPage 231	Policy EN36 supporting text	181- 182	 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) 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) e) 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. Add new text after para 10.25 to form a new para as follows: 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. 	Water (f) (Rep 22/13) To address recommend ations of the HRA.	Provides clarity on HRA related matters, but unlikely to have a significant effect on policy outcomes for the SA (the key details are within the JCS and SPD).
MM72	Para 10.30	183	Add new text after paragraph 10.30, as follows:	To address recommend	Provides clarity on HRA
			Financial contributions to mitigate the adverse impacts of development upon	ations of the	related
			the SPA/Ramsar site will be sought in accordance with the Addendum to the	HRA.	matters,
			SPA Supplementary Planning Document: Mitigation Strategy. In line with the		Provides
			SPD requirements, consultation is required by Natural England in advance of		clarity on HRA
			submitting any planning application. As part of that consultation, further		related matters

			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.		(the key details are within the JCS and SPD).
MM73 Page 232	Policy EN37	184	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) Appropriate development contributions for education and training, to offset the loss of longstanding business premises; f) The preservation and enhancement of the heritage assets on the site, in accordance with a heritage impact assessment and g) The safeguarding of suitable access for the maintenance of foul drainage infrastructure	To address comments from Historic England (SOCG) (f) (Rep 39/09) and Anglian Water (g) (Rep 22/17)	Removal of clause e) reduces the positive effects with regards to education / training and economy. Provides greater certainty that the any impacts upon heritage assets will be assessed and managed.

MM74	Table 25	189	Amend Table 25 as	follows:		Hearings	No significant
	After Para 10.42		Spatial parts of Irthlingborough	Characteristics	Relevant spatial strategy policies	Action Point	implications for SA findings.
			Core urban area (existing)	 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): JC: Policy 11(1 (b)	S	
Pa			Irthlingborough West (Sustainable Urban Extension)	 Permitted major extension to main urban area Will enable new Finedon Road (A6) and Wellingborough Road connections 	Policy EN (1) (b) JC: Policy 11(1) (b)/Annex	S !)	
Page 233			Irthlingborough East	 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 	Policy EN1 (1) (b): JC1 Policy 11(1 (b)	S	
			Crow Hill (lower)	 Ribbon development along Addington Road Separated from main urban area by A6 Bypass 	Policy EN4 JCS Policy 11(2) (a)		

			Crow Hill (upper)	Characteristically suburban, but with rural elements e.g. Bypass Farm/ butchers 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	(1)	
MM75 Page 234	Policy EN39	192	Map, is allocated for real A balance and comparison real b) Enhancements c) Pedestrian competer's Church d) Provision for see Sufficient public f) Opportunities for g) Enhancements	ave and St Peter's Way Car Park site, as shown on the Policies edevelopment, proposals should deliver: d mix of main town centre uses, including convenience and tailing, financial services and/ or food and drink businesses; to the High Street primary shopping frontage; nnections between the High Street, St Peter's Way and St and its proposed arrangements for the new business premises; to car parking; for live-work units at first floor level or above; and the settings of th	To address comments from Historic England (SOCG) (Rep 39/10)	Provides greater certainty that the any impacts upon heritage assets will be managed. However, no significant effects likely for SA findings as the policy already sought enhancement to the settings of assets.
MM76	Supporting text to Policy EN40	194	Amend para 10.52 as	follows:	Request for Note after Hearings	No significant implications for SA findings.

MM77				
Page 235		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 stadium site is surplus to requirements), in accordance with NPPF paragraph 979. Account should also be taken of the findings of any subsequent Playing Pitch Strategy. 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. Add new text after paragraph 10.54 as follows: 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 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.	resulting in text change (AP 118) To address rep by Sport England To address comments from Natural England (Rep 48/08)	

	is all use.	former Rushden and Diamonds FC Stadium site, as shown on the Policies Map, ocated for employment use, with an emphasis on business leisure and tourism 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		protection in relation to heritage protection and provision of open space.
Page 236		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; Suitable access and highways arrangements to enable the site to be served by public transport;		
0)		 Improved arrangements for pedestrians and cyclists crossing the A6 to Station Road and accessing the town centre (east) Pedestrian and cycle connections to East Northamptonshire Greenway, via the Old Bridge and Marsh Lane (west) 	To address	
		Design, height and massing together with high quality landscaping, recognising protecting the setting of nearby heritage assets, such as Irthlingborough Bridge and Crow Hill Iron Age Fort and non-designated heritage assets, and	comments from Historic England (SOCG Rep 39/11)	
		n) Provision for new moorings along the River Nene Navigation allowing direct riparian access, <u>and</u>	To address rep by Sport England	

			facilities, unles	loss of the stadium, playing pitches and ancillary s it can be demonstrated that the facilities are surphiline with paragraph 99 of the NPPF	olus to		
MM78	Para 10.57	195	the closely connected vil Doyle. Figure 28 and Ta the relevant spatial strate parts that are situated	ing rural hinterland consist of four distinctive spatial pa llages of Ashton, <u>Barnwell</u> , Cotterstock, Glapthorn and ble 26 (below) outline the main characteristics of each egy policy references. <u>The Oundle built up area incl</u> within the parishes of Ashton (Elmington; Laxton I I; Barnwell Country Park; Oundle Marina) and Glap	d Stoke , with <u>udes</u> <u>Orive),</u>	To address comments made by Oundle Town Council (Rep 25/05)	No significant implications for SA findings.
MM79 Page	Table 26 After Para 10.57	196	Amend Table 26 as for Table 26 Spatial parts of Oundle	Characteristics	spatial	comments implications made by SA findings. Oundle Town	No significant implications for SA findings.
237			Historic core	 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 Hosts main employment areas – Main employment areas situated to the east of the historic core of the town - Nene Business Park/ Fairline Boats; East Road 	policies	பூearings Action Point	

			Oundle north	 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 	Policy (1)(c); J Policy 11(1)(b)	CS		
Page 238			Oundle Marina/ Barnwell Country Park	 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 E (3)(a); J Policy 11(2)(a)	CS		
W .			Elmington/ Laxton Drive (Ashton Parish)	 Ribbon development along A605 Separated from main urban area by A605 Bypass Suburban element (Laxton Drive) Riverside Hotel presents redevelopment challenge 	Policy E (3)(a); J Policy 11(2)(a)	CS		
MM80	Para 10.60 and 10.61	198	car park at Herne Park to 2014. The former recycle Centre has undergone was occupied by North	the change of use of the former Recycling Centre and Co a mixture of office, light industry and storage was grainly centre and car park adjacent to the Joan Stron some changes in recent years. The former recycling Equipment Ltd in 2016, while the adjacent Herne Park of this days, particularly market days.	nted in I g g centre	To address comments made by Oundle Town Council (Rep 25/9 & 25/10)	No significant implications for SA findings.	

P 3			While both the <u>The</u> recycling centre and former Council car park could provide development opportunities, neither site <u>are brownfield urban sites</u> , but neither 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>		
Б М81 В 239	Policy EN41	200	 Amend Policy EN41 as follows: 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) Retention 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 	Hearings Action Point 120	No significant implications for SA findings.

				connectivity for pedestrian and cyclists, to the town centre (eagle) and riverside paths.	ast, via		
MM82	Table 27 After Para 10.68	202	Table 27			Hearings Action Po	No significant implications for SA findings.
			Spatial parts of Raunds	Characteristics	Relevar Spatial strategy policies	<i>,</i>	
Page 240			Core urban area	 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	 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)		
			Raunds north east	 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	 Sustainable urban extension to the south of town Two significant developments to south of G Street – Weighbridge Way (developed durin 2000s) and Willow Way (2010/11) Major development at Darcy Park (also known Darsdale Farm) recently started, including significant new public open space 	irove (b)	olicy N1(1))); JCS olicy 1(1)(b)		
			Warth Park (wes of Raunds)	 Main employment area of Raunds Major strategic warehousing and distributio Also includes significant new green infrastrubetween warehouses and A45 	n site EN (b)	olicy N1(1) b); JCS olicy 1(1)(b)		
Page 24			Brooks Road	 Ribbon development along Brooks Road, b Northdale End Suburban character Transition between urban (Northdale End) a rural (Brook Farm Livery Stables) 	end Po	olicy N1(3) a); JCS olicy 1(2)(a)		
MtM83	Table 28 After Para 10.72	204	Amend Table 28 Spatial parts of Thrapston and Islip	as follows: Characteristics	Relevant spatial strategy policies		learings ction Point	No significant implications for SA findings.
			Core urban area	 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 Road, Lazy Acre) Includes key services and facilities – town centre retailing, school, main public open 	Policy EN- JCS Policy 11(1)(b)			

				spaces, leisure centre			
			Haldens Parkway (employment area)	 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 	Policy EN1(1)(b JCS Policy 11(1)(b)		
Page			Islip village	 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 	Policy EN1(2)(b JCS Policy 11(2)(a)		
ge 242			Islip south	 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 	Policy EN1(2)(b EN1(3)(a); JCS Policy 11(2)(a)		
MM84	Para 10.83	207- 208	The site is loca	ter paragraph 10.83, as follows: Inted approximately 500m from the SPA, depending roposed a Habitat Regulations Assessment may be by planning application.		To address recommend ations of the HRA.	No significant implications for SA findings.
MM85	Policy EN42	209	Amend Policy E	N42, as follows:		To address comments from	Greater protection for heritage

	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	Historic England (SOCG) (Rep 39/12)	assets, but unlikely to have significant effects on the SA findings.
ס	 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; 		
Page 243	f) Enhancements Preservation and enhancement to the settings of adjacent heritage assets, non-designated heritage assets and the Conservation Area; and		
13	g) Additional town centre public car parking.		

Monitoring and Implementation

MM86	Para 11.4	210	Amend paragraph 11.4 (including amending bullet point 3 and introducing a new bullet point after bullet point 3)) as follows:	Northamptons hire County	No significant
			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:	Council (Development Infrastructure) (Rep 49/04, 49/10)	implications for SA findings.

Page 244	Table 29	214 to 219	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: Amend table 29 as follows:	Hearings Action Point 178	It may be useful to update the
			 Bullet point 3: Education - delivery of new academies/ free schools, working with the Department for Education, in accordance with current local education authority²⁵ and national²⁶ policies. 		

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

	Table 200	9: Performance ind	licators and toward			Ī	framework in the SA Report.
	Policy	Objective	Indicator	Targets Aims	Targets		
Page	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	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		
e 245	EN2	Provide a clear differentiation between the urban/ built up areas and their surrounding rural hinterlands Provide development principles to	Number of dwellings permitted within the main urban areas, and beyond the main urban areas Location and type of development	exceptions housing schemes Restrict inappropriate development beyond the main urban/ built up areas	3 of the Plan All proposals to meet the requirements of the policy.		
		guide development in the rural area.	<u> </u>				

	EN3	Provide a clear	Number of	Restrict			
		differentiation	dwellings	inappropriate			
		between the	permitted within	development			
		freestanding	the free standing	beyond the free			
		villages and their	villages, and	standing villages			
		surrounding	beyond the free				
		rural hinterlands	standing village				
			areas				
	EN4	Provide a clear	Number of	Restrict			
		differentiation	dwellings	inappropriate			
		between urban	permitted within	development in			
		outliers/ ribbon	the ribbon	the defined ribbon			
		developments	development	development			
		and their	areas of lower	areas			
Ų		surrounding	Crow Hill				
Page		rural hinterlands	(Irthlingborough)				
Je			and Brooks				
N			Road (Raunds)				
246	EN5	Protect the	Development	Restrict	<u>No</u>		
(0)		peripheral land	permitted	inappropriate	<u>inappropriate</u>		
		of settlements	outside of the	development on	development on		
		against	defined	the periphery of	the periphery of		
		unsuitable	settlement	settlements with a	settlements,		
		development	boundaries:	defined boundary,	other than for		
		and provide	number of rural	but encourage the	<u>rural</u>		
		suitable	affordable units	provision of	exceptions.		
		development	achieved (Rural	affordable housing			
		management	Exceptions and	to meet identified			
		criteria for Rural	open	needs in the rural			
		Exceptions	countryside	areas			
		Housing	dwellings)				
	ENG	schemes Provide clear	Number of	Restrict the	No	-	
	EN6				No in annua prieta		
		guidelines for	dwellings	development of	inappropriate		
		appropriate	permitted and/ or	inappropriate new	new build		

		replacement dwellings in open countryside	built in the open countryside	build replacement dwellings in open countryside	replacement dwellings in the open countryside other than those which accord with Policy EN6.	
Page	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	Overall net gain in GI.	
e 247	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	Increase in the number of GI projects completed. Completion of the Greenway and associated projects.	
	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 To facilitate the protection of Local Green Space	No loss of Local Green Space. Net increase in Local Green Space.	

		Local Green					
		Space]	
	EN10	Enhance	Number of	Net increase in	Net increase in		
		existing open	permitted	open space across	open space		
		space or provide	developments of	the district	across the		
		new open space	10 or more	To ensure new	district.		
			dwellings, or 0.3	development			
			or more hectares	makes adequate	No net loss of		
				provision for	open space.		
				open space.			
	EN11	Enhance	Number of	Net increase in	Net increase in		
		existing sport	permitted	sport and	sport and		
		and recreation	strategic	recreation facilities	recreation		
_		facilities, or	developments	across the district	<u>facilities</u>		
Page		provide new	Amount of new	To ensure new	provided/		
<u> </u>		sport and	sports and	development	increase in		
		recreation	recreation	makes adequate	improvements		
248		facilities	facilities	provision for	towards		
48			provided/	sports and	existing		
ω			contributions	recreation	facilities.		
			secured toward	facilities.	No. of London		
			facilities.		No net loss of		
					sport and		
					recreation		
					facilities.		
	ENIAO	Provide	Ni. mala an af	To anoble and	All manion	_	
	EN12		Number of	To enable and	All major		
		additional	permissions and	promote healthy	applications to		
		direction re	refusals where	lifestyles. Submission of	be accompanied		
		strengthening	the policy was		by a HIA.		
		the role of health	used to make	Health Impact			
		and wellbeing as	the decision	Assessments to			
		a critical aspect		accompany all			
		of place shaping		major planning			
				applications.			

Page		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. No upheld at appeal Number of	Refusal of planning permission where insufficient mitigation is proposed to address negative health impacts. Restrict inappropriate development of new buildings and extensions so that they are in keeping with the surrounding environment Restrict	100% of cases refused on design grounds to be upheld at appeal.	
249			enhance the appearance and setting of designated heritage assets	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	inappropriate development which affects a designated heritage asset or its setting	existing areas designated Conservation Areas (no net loss); Maintain existing number of listed buildings (no loss) Maintain the number of	

				their intrinsic environmental value including sites of international, national, regional, sub regional or local significance		Scheduled Monuments; Reduce the number of heritage assets at risk (number on Historic England's Heritage at Risk Register)	
Page 250		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	Maintain non- designated heritage assets (no loss).	
		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 Rocking Forest areas, including the conversion of redundant small- scale rural buildings	A net increase of tourist/ cultural facilities	

Page 251	-EN17	guest house/ B&B accommodation Implementation of SEN school proposal at Land west of Moulton College, Chelveston Road within the Plan period	overnight accommodation 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	A net increase in the number of completions for small and medium scale commercial development.	
	EN19	Ensure that existing employment sites are protected for employment use	Use status of the sites	Ne To prevent the loss of employment uses within the Protected Employment Areas unless the site is demonstrably no longer suitable for employment	No net loss of employment uses within the Protected Employment Areas unless the site is demonstrably no longer suitable for employment	

	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	All expanded/reloc ated business to be adjacent to built up area.	
Page 252	EN21	Increase the vitality of the town centres and primary shopping areas frontages	Public realm improvements within the town centres and primary shopping areas 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 areas 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.	
	EN22	Provide floorspace	Number of permitted retail	Restrict inappropriate retail	No specific target, however,	

			thresholds for impact	developments outside the	development outside the	monitoring indicator to		
			assessments for	primary	primary shopping	identify the		
			retail	shopping areas	areas of the six	number and		
			developments	of the six towns	towns	type of these		
						developments.		
				Proposals for				
				out / edge-of		<u>100% of</u>		
				<u>centre</u>		proposals for		
				supported by a		out / edge-of		
				sequential test		<u>centre</u>		
				and an impact		supported by a		
				assessment		sequential test		
				where above		and impact		
				the relevant threshold		assessment above the		
ס				tillesiloid		relevant		
Page						threshold		
ge		EN23	Provide clear	Number of	Encourage	100%		
N			direction for	permitted	specified main	adjoining/closel		
253			specified main	specified main	town centre uses	y related to built		
ω			town centre use	town centre uses	at outside of the	up area;		
			developments at	<u>adjacent</u>	local centres that			
			outside of the	towithin 200m of	offer day to day	Amount of new		
			local centres	the local centres	local services,	floorspace for		
					improved	each type of use		
					connectivity and			
					do not affect local			
		ENIO 4	D !: (''	B.A. (* ''	amenity		4	
		-EN24	Delivery of sites	Meeting overall	To provide for			
			in accordance with the Local	strategic housing	strategic shortfall			
			Plan (Joint Core	requirements at Oundle and	in housing numbers of around			
			Strategy)	delivery of	300 dwellings at			
			requirements	uciivei y Ui	Oundle			
			requirements		- oundie			

	EN25	Implementation of Stoke Doyle Road site within the Plan period	associated infrastructure Meeting strategic housing requirements site specific	To provide site specific housing requirements assisting the strategic shortfall at Oundle	Delivery of the site by 2031	
	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	Delivery of the site by 2031	
Page 254	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	Delivery of the site by 2031	
	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	Delivery of the site by 2031	
	EN29	Delivery of an appropriate quantum of Category 3 (wheelchair accessible or adaptable)	Number of Category 3 (wheelchair accessible or adaptable) units delivered	Delivery of 5% of units as Category 3 housing on sites of 50 dwellings or more-To increase the delivery of Category 3 housing	Delivery of 5% of units as Category 3 housing on sites of 20 dwellings or more	

	housing to mee local needs EN30 Delivery of an appropriate mix of housing size types and tenures to mee local need	Type, mix and range of units achieved	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	
Page 255	EN31 Delivery of specialist housing: Older persons accommoda on to meet local need Extra Care developmer schemes as part of major strategic sites in accordance with local needs	achieved on sites over and above the defined policy thresholds	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: Rushden East SUE Irthlingborough West SUE St Christopher's Drive, Oundle	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: Rushden East SUE Irthlingborou gh West SUE St Christopher'	

					East of Ferrers School, Higham Ferrers To increase delivery of specialist housing for older persons.	s Drive, Oundle Hayway, Northampton ton Road, Rushden East of Ferrers School, Higham Ferrers	
Page 256		EN32	Delivery of self and custom build	Number of self and custom built dwellings achieved on sites of 50 dwellings or more	At least 5% of plots on sites of 50 dwellings or more safeguarded for self or custom built dwellings To increase delivery of self and custom build housing.	At least 5% of plots on sites of 50 dwellings or more provided for self or custom built dwellings Meeting demand on self/custom build register	
		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	Meeting strategic housing requirements site specific Phased delivery of SUE in accordance with MFD phasing/ trajectories	Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/trajectory and the housing trajectory for East Northamptonshire	Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory	

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improvements,				VVIIINII ISOIT SILGS	VVIIINII ISOIT SILUS			
						and provision of		
public car parking								

		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	By 2031, redevelopment of the site as set out in Policy EN36.	
Page 258		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	By 2031, redevelopment of the site as set out in Policy EN37.	
		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	By 2031, redevelopment of the site as set out in Policy EN38.	

Page 25		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	appropriate mitigation measures 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 EN39.	
59		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	By 2031, redevelopment of the site as set out in Policy EN40.	

Page 260			Redevelopment of the Riverside Hotel site	permitted on the Riverside Hotel site	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	By 2031, redevelopment of the site as set out in Policy EN41.	
		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	By 2031, redevelopment of the site as set out in Policy EN41.	

the setting of heritage assets, and public car parking	

Glossary

MM88	Glossary	221	Amend glossary definition as follows: Infill or windfall development- Smaller scale, minor development proposals, typically	For clarity following	No significant implications for
			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-EN1-EN2 and the supporting	revision to Policies EN1 -	SA findings.
			text.	4	
₩	Glossary	223	Amend definition for Primary Shopping Area/ Primary Shopping Frontage as follows:	Hearings Action Point 94	No significant implications for
age 2			Primary Shopping Area (or Primary Shopping Frontage) – defined areas where retail development is concentrated.	Action Form 94	SA findings.
261			Primary Shopping Frontage – Shopping frontage which contains a high proportion of retail uses.		

Appendix 1

MM90	Policy EN33	Append	Amend Strategic/ non-strategic (with commentary) column as follows:	To reflect	No significant implications for
		ix 1,	Non-sStrategic – Policy 33 of the Joint Core Strategy provides the strategic direction;	discussions at the hearing	SA findings.
		page 12	i.e. establishing the principle of development to the east of the A6 Bypass, Rushden.	sessions.	SA illiulitys.
		12	Policy EN33 provides additional site-specific detail; i.e. setting site boundary/ zonal	(Action Point	
			allocation and allowing for incorporation of Masterplan Framework Document into	2)	
			Local Plan Part 2.	,	
			In addition, revised Policies EN1 and EN2 remain as strategic policies, whilst Policies		
			EN3, EN4, EN17 and EN24 are deleted as policies.		

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Appendix 5

MM91	Appendix 5	Append	Amend the type of home in the final table as follows:	Hearings	No significant
	 Specialist 	ix 5,		Action Point 74	implications for
	and Older	page 2	Apartment, or bungalow or smaller home		SA findings.
	Persons				
	Housing				
	Provision				

Appendix 6

ММ93	Appendix 6 Append Delete Appendix 6 in its entirety and associated references to Appendix 6. — Rushden ix 6 East MFD								Post Hearings Letter Action		No significant implications for SA findings.			
MM93 Appendix 6 Append Insert new Appendix 6 as follows: - Housing Trajectory Insert new Appendix 6 as follows:							In response to request from Inspector		No significant implications for SA findings. No significant					
	Source of Housing Supply		2020/2 1	2021/2 2	2022/2 3	2023/2 4	2024/2 5	2025/2 6	2026/2 7	2027/2 8	2028/2 9	2029/3 0	2030/3 1	implications for SA findings.
Past C	Completions	3883												
Under construction starte	ruction/		<u>263</u>	<u>179</u>	114	108	8	0	<u>0</u>	0	<u>0</u>	<u>0</u>	<u>0</u>	

Full planning permissions/minor outline permissions		<u>66</u>	207	98	2	<u>0</u>	0	<u>0</u>	<u>0</u>	0	0	0	
Outline planning permissions (major >9)		<u>0</u>	<u>0</u>	14	10	<u>0</u>	<u>0</u>	<u>0</u>	0	<u>0</u>	<u>0</u>	0	
Major urban extensions		<u>0</u>	<u>0</u>	0	0	100	<u>150</u>	200	<u>250</u>	<u>250</u>	<u>250</u>	250	
Other site allocations (current local plan)		0	0	<u>0</u>	<u>25</u>	<u>29</u>	<u>51</u>	<u>25</u>	<u>14</u>	<u>6</u>	0	0	
Neighbourhood Plan site Allocations (Made)		0	2	<u>119</u>	<u>183</u>	<u>172</u>	<u>109</u>	<u>128</u>	<u>132</u>	41	<u>5</u>	10	
Emergent DPD allocations		0	80	<u>85</u>	<u>173</u>	128	117	100	<u>60</u>	80	80	<u>65</u>	
Rural and Market Town windfall sites		0	40	30	<u>55</u>	60	0	0	<u>0</u>	0	0	0	
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	





Local Plan for East Northamptonshire

Main Modifications Habitats Regulations Assessment

North Northamptonshire Council

6 December 2022

Quality information

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Prepared for: North Northamptonshire Council

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AECOM

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1. Introduction

- 1.1 AECOM was appointed by North Northamptonshire Council to assist the Council in undertaking a Habitats Regulations Assessment of the Local Plan for East Northamptonshire. The HRA included an appropriate assessment and concluded no adverse effect on the integrity of any European sites, and that the Local Plan had suitable framework in place that development delivered would not affect the integrity of any European sites either alone or 'in-combination' with other plans and projects.
- 1.2 Following the Examination into the Local Plan, the Inspector has recommended a series of Main Modifications (MM) to be made to the Plan. It is therefore necessary for those modifications to be analysed in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the Local Plan. That is the purpose of this report.
- 1.3 Note therefore that this report should therefore be considered an Addendum to the HRA of the Local Plan. As such, it does not recap the methodology of the HRA or the results of either the likely significant effects test or appropriate assessment of the Local Plan, including the 'in-combination' assessment. Instead it focuses specifically on whether the Main Modifications (MMs) will result in likely significant effects on any European sites.

2. Likely Significant Effects of Main Modifications (MMs)

1.4 The tables overleaf set out the assessment of each Main Modification (MM). The MM number, the corresponding Policy or paragraph number and the modification itself are presented in the first five columns of the table below. The assessment of likely significant effects is then presented in the sixth column.

Table 1 Test of Likely Significant Effects for the Main Modifications to the Local Plan for East Northamptonshire

Ref No.	Para/	Publicati	Proposed Change	Reason for	Test of Likely
	Policy/	on Plan		Change	Significant
	Figure/Tab	Page			Effects
	le/Map ref				

Introduction

MM1	Para 1.23	18	Amend text to para 1.23 as follows: 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".	For greater clarity (Action Point 1)	No likely significant effect
Page 272	Para 1.46 and 1.47	23	Amend paragraphs 1.46 and 1.47 as follows: 1.46 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 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. 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 (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.	To address comments from Natural England (Reps 48/13 and 48/16)	No likely significant effect. The changes add clarity and thus reinforce protection for European sites

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	The SPA/ Ramsar site is also protected by 3 and 4km buffer zones shown on the adopted Policies Map, within which the SPA Mitigation Strategy ²³ 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.	
	Add new paragraph as follows: 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 .	

Area Portrait

g					
6 273	Paras 2.10 and 2.11	29	Amend paragraph 2.10 and 2.11 as follows: 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	Factual Update	No likely significant effect.
			addressed as this is taken forward through master-planning. The masterplan will define the development boundaries and policy expectations for the SUE. 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		

¹ https://www.east-northamptonshire.gov.uk/downloads/file/11094/emaqn_aq_and_planning_developer_guide_-_july_2018

 $^{^2\,\}underline{\text{https://www.east-northamptonshire.gov.uk/info/200153/planning}}\,\,\underline{\text{and}}\,\,\underline{\text{buildings/1881/rushden}}\,\underline{\text{sustainable}}\,\underline{\text{urban}}\,\,\underline{\text{extension}}$

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

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 EN33.	
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Spatial Development Strategy

MM4	Para 4.14	51	Amend paragraph 4.14 as follows: 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.	To reflect changes to the spatial policies.	No likely significant effect.
Page 274	Para 4.29	56	Amend paragraph 4.29 to reflect changes proposed to policy EN1 as follows: Policy Policies EN1 and EN2 (below) explains how the spatial development strategy should apply. The policies It provides additional district-level direction to support the development management process or provides further strategic direction for the preparation of neighbourhood plans.	To reflect changes to the spatial policies.	No likely significant effect.
MM6	Policy EN1	56	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) along with local considerations for assessing development proposals set out below and through Policy EN2 and the supporting text. 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. 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		No likely significant effect. This clarifies text but does not fundamentally alter the settlement hierarchy

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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 (Policy EN28). 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.

Hearings outcome Action Points 13,14, 15

- b) Irthlingborough, Raunds and Thrapston 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.
- c) Oundle At Oundle, Ddevelopment will be directed towards delivering the outstanding allocations, Further development proposals, 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), 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.

To address comments from Francis Jackson Homes (Rep 21/01

2. Freestanding Villages

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.

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.

Page 276			Within the eight larger freestanding villages (Table 4) larger scale ⁴ development opportunities may be supported where it can be demonstrated that they are necessary to fulfil a defined local need. ⁵ 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 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 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. 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.		
Э М7	Para 4.31	58	Amend the sub heading to this section of text at para 4.31 Settlement boundaries- differentiating between built up areas and the countryside Defining Built-up areas	To reflect changes to the spatial policies.	No likely significant effect.
MM8	Para 4.35	59	Amend paragraph 4.35 as follows: 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 settlement boundary criteria in together with the supporting text to Policy EN2 provide more detailed criteria to support those in the Joint Core Strategy Add the following as new supporting text after para 4.35	To reflect changes to the spatial policies.	No likely significant effect. This clarifies text but does not fundamentally alter the settlement hierarchy

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.

Page 277			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. 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. 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. 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.		
MM9	Policy EN2	59	Policy EN2 is deleted in its entirety and replaced with the following policy: Policy EN2 Settlement boundary criteria -urban areas	To reflect changes to the spatial policies.	significant effect. This is a development
			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: a) Small in scale, relative to an otherwise built up frontage; b) Well related to the urban area (existing or committed); c) Clearly distinct from the countryside physically and visually; d) Bounded by compatible development (existing or committed);		control policy that simply sets out the broad circumstances under which development

	 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); f) Unlikely to be of any beneficial use as open land, including for agriculture, or; g) Committed for development by way of an extant planning permission or development plan allocation. 	would be acceptable
	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;	
Pa	(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:	
Pa ge 27 8	(a) well-related to the principal built-form of the settlement (existing or committed) and is not protected for any other use;	
78	(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.	

MM11 Page 279	Para 4.39 and 4.40	60-61	At the freestanding villages, new residential infill development should occur within the existing built up areas, as defined by the Policy EN3 criteria (below) EN2 and the supporting text. 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. Delete para 4.40 in its entirety: 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. Delete Policy EN3 in its entirety: Policy EN3-Settlement boundary criteria- freestanding villages (Table5) 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: 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 excluded: 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 excluded: c) public open spaces on the edge of villages are excluded: d) residential curtilages, where these are bounded by existing built curtilages on fewer than two sides, are excluded: and e) areas of land committed for development by way of an extant planning permission or development	To reflect changes to the spatial policies. To reflect changes to the spatial policies.	No likely significant effect. No likely significant effect.
MM12	Paras 4.41- 4.43	61	Delete paras 4.41-4.43 in their entirety 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	To reflect changes to the spatial policies.	No likely significant effect.

			_		
			Rushden urban area and has a predominantly suburban character 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.		
			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:		
			 Lower Crow Hill (Addington Road, Irthlingborough); and Brooks Road, Raunds. 		
Page			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.		
ГЭ1 М13	Policy EN4	61	Delete Policy EN4 in its entirety: Policy EN4 Settlement boundary criteria- ribbon developments 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; a)— is bounded by existing built curtilages on at least two sides; b)— has a frontage to the highway and a depth similar to adjoining residential curtilages c)— does not extend the built form away from the main highway to create a "backland" form of development; and d)— has regard to positive local character and distinctiveness.	To reflect changes to the spatial policies.	No likely significant effect.
MM14	Policy EN5	63	Amend Policy EN5 as follows: Policy EN5 3 Development on the periphery of settlements with a defined settlement boundary and rural exceptions housing	To reflect changes to the spatial policies.	No likely significant effect.
			Beyond the <u>extent of the built up area</u> <u>defined settlement boundaries</u> , as defined <u>in the supporting text</u> <u>to by policies</u> <u>Policy</u> EN2— <u>EN4</u> (or defined, <u>by a settlement boundary,</u> within a made Neighbourhood		

			Plan), new build residential development will not generally be supported. However, <u>proposals for</u> rural diversification, the re-use or conversion of rural buildings, or rural exceptions housing schemes will be supported ⁶ . where it fulfils the relevant development plan policies. 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: 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 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 even though services may be restricted evidenced by a local needs housing survey		
₱age 281	Policy EN6	64	Amend Policy EN6 as follows: Policy EN6 4 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 seen 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 to the latest applicable national space standards), the floor space may be increased to meet	To reflect changes to the spatial policies.	No likely significant effect.

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.

	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-the wider	(e)Hearings Action Point 22	
	character area, taking into account any wider impact of the development in its general location.	(f)Hearings Action Point 23	
	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.	Hearings Action	
		T SIIIC ZT	

Natural Capital

О ММ16	Supporting text to	68 - 70	Amend second sentence of paragraph 5.12 as follows:	Hearing Action Points 142, 146,	No likely significant effect.
282	Policy EN7 Para 5.12 & Figure 7		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.	147, 150	
			Add two new paragraphs after paragraph 5.12 as follows:		
			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.		
			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.		
			Amend the Figure 7: Priority Green Infrastructure Corridors Legend as follows:		
			New Suggested Local GI Corridors		
			Amend final sentence of paragraph 5.14 as follows		
			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. 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		
ag			and maintenance arrangements.		
Page MM17 283	Policy EN7	70	Amend EN7 Policy title as follows:	Hearings Action Point 141, 142,	No likely significant effect.
ထိ			Policy EN7: <u>Local</u> Green Infrastructure corridors	143, 144, 145, 146	organicant ondet.
			Amend Policy EN7 as follows:	140	
			<u>Local</u> Green Infrastructure corridors are identified on the Policies Map <u>and Figure 7</u> . These <u>local</u> corridors will be protected and enhanced <u>bythrough development proposals</u> . <u>Development proposals will be expected to</u> :		
			 Ensureing that, where opportunities exist, new development, including open space, is connected to the Local Green Infrastructure network, this includes the local Gl corridors and the wider Green Infrastructure network; 		
			b) Ensur <u>eing, 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 existing and proposed Green Infrastructure network; and d) Requiring sites of 10 dwellings or more (or 0.5ha or more) and commercial sites or 1000m² or more to make on-site provision and/ or pProvideing 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: 	
Page 284			 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 	
MM18	Supporting text to Policy EN8 Paras 5.15 – 5.17 & Figure 8	71-73	Amend para 5.15 second sentence as follows: 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. Add new paragraph after paragraph 5.17 as follows: 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. Remove Unsuitable Greenway Routes from Figure 8: The Greenway and amend the Legend as follows:	No likely significant effect. The addition of equestrian users doesn't alter the potential impacts on European sites from the Local Plan

		Unsuitable Greenway Routes		
MM19 Policy EN8	74	Amend Policy EN8 and delete footnote 62, add the text from the footnote to the end of the policy and amend as follows: 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. 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; therefore a. be designed to protect and enhance the Greenway, and to strengthen connections to the wider green infrastructure network within the District. b. Its development must 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 or 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. 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. 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 empany, as appropriate. Footnote 62: 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	To address Historic England comments. (Rep. 39/03 and SOCG) For greater clarity Hearing Action Point 152, 153, 155	No likely significant effect.

Page 286	Policy EN9	75	Amend Policy EN9 as follows: Policy EN9: Designation of Local Green Space	Hearing Action Points 157, 158, 159, 160	No likely significant effect.
			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 a 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 iii) Recreational importance iv) Tranquillity, or v) biodiversity; and vi) beauty; and c) The gross area of the site does not exceed 0.5 ha or 10% of the existing main built up area of the settlement, whichever is larger. and not an extensive tract of land. 		
MM21	Para 5.25 - 5.31	76 - 78	Amend Para 5.25 amend second to last sentence and delete the last sentence (including footnote 65) as follows: 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 or any subsequent updates). The KKP study should also be utilised in conjunction with other targeted investment strategies such as the Local Football Facility Plan (March 2020). Amend paragraph 5.30 as follows:	To address Sport England comments. (Rep. 20/01) To address issues raised by Bellway Homes (Rep 26/02)	No likely significant effect.
			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 $0.3\underline{5}$ 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	Hearing Action Points 163, 164, 165, 166	

Page 287	Policy	70	older people. The preference is for provision to be made onsite, however w.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. Amend paragraph 5.31 as follows: 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 through Policy EN33 and informed by 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). Add two new paragraphs after paragraph 5.31 as follows: 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. 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. Amend footnote 69 as follows: 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.	To address	No likely
MM22	Policy EN10	79	Amend Policy EN10 as follows: With the exception of the Rushden East Sustainable Urban Extension, <u>aAII</u> 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.	To address Bellway Homes comment. (Rep. 26/02 and SOCG)	No likely significant effect.

Page 288	Supportion	90.93	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 insufficient access to existing open space identified within the local area*0. 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 EN33, via the Masterplan Framework Document for that development (Appendix 6). 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. This will be delivered by way of either adoption of the open space by the relevant Town/ Parish Council, or the setting up of a management company. Developers should work with the Council to determine the most appropriate long term management and maintenance arrangements. Delete footnote 70 as follows: 'Local' is defined as Parish area; a reflection of the responsibilities of Town and Parish Councils for maintaining their stock of public open spaces	Hearing Action Points 161, 162, 167, 168	No likely
MM23	Supporting text to Policy EN11 paras 5.32 to 5.36	80-83	Add new sub heading above paragraph 5.32 as follows: Sport and Recreation Delete figure 9, footnote 71 and heading as follows:	Hearing Action Points 169, 170, 173	No likely significant effect.

		Figure 9: Playing	Pitch Strategy a	and Action Plan – North and	d South areas ⁷²			
			-	sessment, Figure 1.1				
			,g					
		Delete Table 9 as follows:						
		Table 9: Playing pitch demand calculator						
		Type of facility	Analysis area	Current demand	Future demand	Total		
				shortfall	shortfall	demand		
		Football (grass	North	1.5 youth (11v11) match	0.5 adult match sessions	0.25 adult		
		pitches)		sessions	2.5 youth (11v11) match	pitches		
		,		1.5 youth (9v9) match	sessions	2 youth		
				sessions	2.5 youth (9v9) match	(11v11)		
					sessions	pitches		
-						2 youth		
)						(9v9)		
						pitches		
			South	2.5 adult match sessions	4 adult match sessions	3.25 adult		
				1 youth (11v11) match	5 youth (11v11) match	pitches		
				sessions	sessions	3 youth		
				0.5 youth (9v9) match	4.5 youth (9v9) match	(11v11)		
				sessions	sessions	pitches		
						2.5 youth		
						(9v9)		
		F # # #00	N. d	0 00 " 1		pitches		
		Football (3G	North	One 3G pitch	-	One 3G		
		AGPs)	South	Demand being met	_	pitch		
		D 1 " 1		ŭ .		0.05		
		Rugby pitches	North	4.5 senior match	-	2.25 senior		
				sessions 3 mini match sessions		pitches 1.5 mini		
				ə mini match sessions		pitches		
			South	5 senior match sessions	_	2.5 senior		
			oouin	o senior maich sessions	_	2.5 senior pitches		
						pitches		

Page 290			major residential developer contribu pitches or make p Add new paragrap A Sports and Ret This will set out tools to inform d Strategy (or subs	ng New developments ar ations towards the rovision for these of after 5.36 as for a step by step precision making.	I be prepared to set out the rocess for calculating request the focus for investment of and where appropriate, of	evelopments will be required to sport and recreation expresses for determining sport in the subject of contributions will be the relevant documents.	uired to provide n facilitiesplaying ng contributions. ngland planning the Playing Pitch s, including		
			Sports Facilities	Strategies, Phys nbourhood Plans	sical Activity and Sports Fr and/ or plans or strategie	ameworks, Health and	Wellbeing		
MM24	Policy EN11	84	Amend Policy EN	11 as follows:				Hearing Action Points 171, 172, 173, 174, 175, 176	No likely significant effect.

For aAII 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, contributions to enhance the quality and value of existing sports and recreation facilities playing pitches within the locality and/or create new facilities to meet needs arising from the development. 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. most up-to-date evidence base.

New strategic development for employment and housing will be required to contribute to the provision of playing pitches to meet the need arising from the development. Preference will be to meet that need through new onsite provision, though off-site provision and enhancement of existing facilities will be considered, where a need for such an approach can be fully justified 73.

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.

Playing pitches, sports or recreational facilities will be provided for strategic development, in accordance with the accessibility standards set out in Table 7 (above).

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.

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>

Delete footnote 73 as follows:

Strategic development sites are defined in the Joint Core Strategy as developments of 500 or more dwellings/ 5ha or more of employment uses

age 29

Social Capital

MM25	Paras 6.10- 6.11	87	Amend para 6.10 (6 th bullet point), as follows: 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. Amend paragraph 6.11 as follows:	To address comments by the National Trust (Rep 27/01) and British Horse Society (Rep 34/03)	No likely significant effect.
Pa			A range of good practice exists in regard to designing for good health and wellbeing. Three documents are cited as particularly useful references ⁷⁵ . 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 applications/ proposals to be prepared in line with the latest EMAQN guidance [link to document already provided at section 1].	To address comments from Natural England (Rep 48/15)	
Page 292	EN12	88	Amend Policy EN12 as follows: Policy EN12: 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 the design and 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; b) Creating a distinctive, high quality and accessible public realm which promotes and encourages physical activity and social engagement; c) Giving due consideration 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 in-the design process, for example, through pre-application advice, to ensure that the issues identified can be	Hearings Action Points 122, 123, 124, 125, 126, 127	No likely significant effect.

			addressed or incorporated into the design proposals, in accordance with 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 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. Delete footnote 78 as follows: As a guide, HIAs for large major development (say, 100 dwellings + or 5000m² floorspace +) are expected to be substantial, in accordance with the guidance set out in the Planning and Health Protocol and HIA toolkit		
мм27 Раде 293	Policy EN13	90	Policy EN13: 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 united 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 have regard to 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;	Hearings Action Points 128, 129, 130, 131	No likely significant effect.

			g) For all other developments, meets the provide sufficient internal space in line with National Space Standards as referred to in Criterion (b) of Policy 30 of the Joint Core Strategy; and h) Includes parking provision in line with the Countywide parking standards and, where appropriate, incorporates changing points for electric vehicles; and where appropriate, incorporates changing points for electric vehicles; and i) Does not result in unacceptable problems of significant harm arising from light pollution.	To address Bellway comment (Rep. 26/03 SOCG)	
MM28	Policy EN14	93	Amend Policy EN14 as follows: 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.	Hearings Action Points 132, 133, 135	No likely significant effect.
Page 294			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. 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: a) the importance of the asset; b) the scale of harm; and e) where the nature and level of the public benefit of the proposal demonstrably outweighs the harm or loss. Where development: a) protects and enhances heritage assets (including non-designated assets) and prevents harm to their significance and setting	To address Historic England's concerns. (Rep 39/04 SOCG)	
			b) has been informed by a conservation area appraisal, landscape character assessment, village design statement of 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 d) conserves, protects and enhances heritage assets that are considered to be at risk.		

MM29	Para 6.33	94	Amend Paragraph 6.33 as	follows:	Hearings Action	No likely
VIIVIZ9	and Table	94	Amenu Faragraph 6.33 as	TOHOWS.	Point 135	significant effect
	10		In order to ensure consiste	ncy, Policy EN15 (below) sets out further guiding principles for preparing local	T OILL TOO	Significant check
				Fable 10 (below), which and provides clarity on the types of building, sites and		
				considers to be non-designated heritage assets, thereby setting a local blueprint		
				ng a local list. It is not necessary for an asset to meet all relevant criteria, and		
				set is not a relevant consideration when deciding whether or not a building, site		
			or structure is a heritage as			
			Delete table 10 as follows:			
			ole 10: Criteria for decidin	g whether a building/ site/ structure should be considered as a non-		
			signated heritage asset			
			e of asset	Criteria for selection		
			toric 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		
1				Strong group value		
				Within, or contributing to, a locally significant landscape		
			Idings and structures	Aesthetic/architectural merit		
				Historic association		
				Age and rarity		
				Completeness Social or communal value		
				Social of communal value		
			sets of archaeological	This Plan will follow the clarification provided by the Planning Practice		
			rest	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	Amend Policy EN15 as follows:	To address comments from	No likely significant effect.
	LIVIS		Development affecting a non-designated heritage asset ⁹⁰ (This relates to all relevant heritage assets	the National Trust	Significant chect.
			buildings or structures, not just those on a local list, i.e. non-designated historic parks and	(Rep 27/01)	
			gardens; buildings and structures; and/ or archaeological remains) where it is designed	(Nep 27/01)	
			sympathetically having regard to the significance of the asset, its features, character and setting will be	Hearings Action	
			supported. Development should seek to enhance the character of the non-designated heritage asset	Points135, 136	
			whether or not it is included in a local list.	1 01113 100, 100	
			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 ham or loss.		
			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		
Σ Σ			the asset and the scale of harm or loss.		
Page 296			Whether a site, feature or structure is considered to be a non-designated heritage asset will be guided by		
\sim			the criteria set out in Table 10.		
8			Table 10:		
			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 Historia association		
			 Historic association Age and rarity 		
			• Completeness		

			Social or communal value Assets of archaeological interest This Plan will follow 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. Delete footnote 90 as follows: 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.		
ммз1 Раде 297	Para 6.49	99	Amend para 6.49 by adding an additional sentence after the first sentence as follows: Policy EN16 a) sets out the 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. Add new text after paragraph 6.49 as follows: 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.	To address comments from Natural England (Rep 48/05) To address recommendations of the HRA. Hearings Action Point 138	No likely significant effect.
MM32	Policy EN16	99-100	 Amend Policy EN16 as follows: 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: 	Hearings Action Point 137	No likely significant effect. Although a reference to the Upper Nene Valley Gravel Pits SPA has been

Page 298	Paras 6.53	101-103	i. Are acceptable in terms of highways access, subject to compliance with other relevant policies; ii. De not adversely affect sensitive receptore (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)). 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 this fulfile the following oritoria, whereby: i) Special regard shall be given to parking provision and the impact upon the amenity of neighbouring properties; ii) Nnew-build accommodation, where this fulfile the place-chaping 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, 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 accommodation. Delete subheading below paragraph 6.52 as follows:	Hearings Action	removed, this was done because JCS Policy 4 and the Special Protection Area SPD already cover these issues. There is also some additional new supporting text added through MM31 which covers the issues addressed in former criteria aii.
	to 6.57, Figure 11 and 12		New school proposal, Chelveston Road, Higham Ferrers	Points 139 & 140	significant effect.

'age 299

Amend paragraph 6.53 as follows:

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 been would 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 which opened in September 2021.

Delete paragraphs 6.54 to 6.56 as follows:

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).

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.

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.

Delete figure 11 and title as follows:

Pac			Figure 11: Sports Masterplan, Newton Road, Higham Ferrers (Planning Policy Committee, 20 January 2020, Item 6, Appendix 3) Delete paragraph 6.57 as follows: 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 development of new community facilities (including education) where appropriate (Policy HF.CD2). Delete Figure 12 and title as follows: Figure 12: Land to the west of Moulton College, Higham Ferrers		
Радемм34 300	Policy EN17	104	Delete Policy EN17 as follows: Policy EN17: Land south of Chelveston Road, Higham Ferrers 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: 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	No likely significant effect.

Economic Prosperity

MM35	Para 7.17	110	Add the word "target" into the third sentence as follows:sets an overall requirement for a net growth target of 7,200 jobs	To clarify the context of job provision in line with the Joint Core Strategy Hearings Action Point 77	No likely significant effect.
Page 301	Supporting text to Policy EN18 Para 7.34	115	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. 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.	To address comments from Natural England (Rep 48/06) To address recommendations of the HRA. For consistency with Hearings Action Point 138 Hearing Action Point 82	No likely significant effect. This change has been made in part to reflect HRA recommendations and Natural England's comments and clarifies and strengthens protection for European sites
MM37	Policy EN18	115-116	Amend Policy EN18 title to add the following words: Development of commercial space to support economic growth for Small and Medium-sized enterprises Amend Policy EN18 as follows:	Hearings Action Point 80,81	No likely significant effect.

				osals for the development of new commercial employment space will be supported where iver flexible, managed workspace for, small, <u>medium</u> and micro-businesses. Such projects		
			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 Standards ¹¹³ ,;		
			c)	Deliver pedestrian, cycle and public transport connections to adjacent businesses, residential areas and public open spaces, to maximise integration with the surrounding locality ¹¹⁴ ;		
			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.		
1 MM38	Policy EN19	119	Amend Policy	y EN19 as follows:	Hearings Action Point 83	No likely significant effect.
Ф ммз8 302			Proposals for provision of e use. A reduct employment a) Theirede b) Conterm	employment sites, as shown on the Policies Map, are protected for employment use ¹¹⁷ . The re-development or changes of use of existing buildings should ensure that the overall employment on the site after development is no less than that of the current or most recent ion in the level of employment net job numbers/employment land or development for non-uses can only be supported where it can be demonstrated that: The is no realistic prospect of the site or buildings being used or re-used, including evelopment, for employment purposes ¹¹⁸ ; and/or Straints associated with the site or buildings mean these would be unsuitable for re-use, in this of siting, design, access, layout and relationship to neighbouring buildings and uses in the elopment contributions will be made to support economic development across the district.	To address comments from Crown Estate (Reps 44/04 and 44/05) Additional policy amendments Hearings Action Points 84, 85	
MM39	Supporting text to Policy EN20 Para	120	The potentia	al impacts of proposals for the expansion or relocation of existing business premises r Nene Valley Gravel Pits SPA need to be fully considered. Policy 4 of the JCS and the	To address comments from Natural England (Rep 48/07)	No likely significant effect. This change clarifies the
	7.49			ection Area SPD set out requirements for developments with the potential to have an act on the SPA. Development with the potential to cause an adverse effect on the SPA		position regarding

			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.	For consistency with Hearings Action Point 138	impacts on European sites
MM40 Page 303	Policy EN20	120	Amend Policy EN20 as follows: 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., or for businesses that need to relocate, will be supported where they meet the following criteria: 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: a) Is adjacent to an existing built up area, provided that and that there is no significant impact on the countryside, or character of the surroundings: ecology, highways, the character of the surroundings-or the amenity of neighbouring properties 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: c) Where necessary, is suitable for the provision of HGV or commercial vehicular access to the strategic or classified road network d)-b) For main town centre uses, if applicable, meets the requirements of the sequential and impact tests; and e)-c) Provides maximum accessibility for the workforce by sustainable modes of transport such as walking, cycling and public transport.	•	No likely significant effect.
MM41	Supporting Text to Policy EN21	121 -124	Table 13 – amend title of the third column as follows: Designated primary shopping area frontage (since 2012 NPPF)		No likely significant effect.
	LINZI		Add new text after para 7.56:	policies map.	

			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. 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.	Hearing Action Points 95, 96	
Page 304	Policy EN21	124	Amend Policy EN21 as follows: Development within the town centre boundaries of Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds ⁸ 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, 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 town centre useUse Class, with the exception of retailing; d) Retaining a predominantly retail offer for the defined primaryshopping frontages, as shown on the policies map; e) Enhancing the streetscape, to maximise opportunities for increased footfall;	To ensure the geographical application is illustrated on the policies map. Hearing Action Points 87, 90, 91, 92, 93, 96	No likely significant effect.

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

			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.		
MM43	Policy EN22	126	Proposals for retail development outside the town centre boundaries primary shopping areas of the six town centres Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds ⁹ 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 guidance¹0. Failure to demonstrate there will be no significant adverse impact would result in a refusal of planning permission.	To ensure the geographical application is illustrated on the policies map. Hearings Action Points 97, 98, 99, 100, 101	No likely significant effect.
ω MM44 Ti	Supporting text to Policy EN23	129	Add new text after paragraph 7.76 as follows: 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.	To set out the circumstances which may result in the removal of permitted development rights.	No likely significant effect.
MM45	Policy EN23	130	Amend policy EN23 as follows: Policy EN23: Development of main town centre uses around the ILocal Centres	To ensure it is clear that the geographical application is	No likely significant effect.

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

illustrated on the For Proposals of a scale and type limited to serving the immediate local area, minor development policies map. schemes¹¹ which are adjoining or closely related to within 200m¹² of the designated local centres, as set out below and shown on the policies map, will be supported for, there will be a general Hearings presumption in favour of the following types of 'main town centre' uses: Action points 102, Convenience retailing: 103, 104, 105, Financial services: 106. 107 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 developments rights may be removed where exceptional circumstances are considered to exist. 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 thresholds given

	in Policy EN21.	
	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.	

Housing Delivery

MM46	Para 8.3	132	Add the following text after paragraph 8.3: 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).	Hearings Action Point 34	No likely significant effect.
Page 307	Para 8.4	132	Provide a new paragraph after para 8.4 as follows: 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.	In response to request from Inspector	No likely significant effect.
MM48	Paras 8.5 to 8.15, inc tables 14 and 15	132 to 136	Amend paragraph 8.5 as follows: 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 (2011-20192020). Alongside these, a large number of smaller development sites have also come forward; these are included in the latest (20192020) AMR Housing Site Schedule 13.	To update with 2020 monitoring information.	No likely significant effect. These changes simply reflect the latest position on housing delivery rather than changing the overall

¹¹-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.

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/meetings/meeting/1062/planning_policy_committee https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee <a href="https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee <a href="https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee <a href="https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee <a href="https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee <a href="https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee <a href="https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee <a href="https://www.east-northamptonshire.gov.uk/meetings/meetin

quantum of Amend paragraph 8.6 as follows: development to be delivered over the At Raunds, development sites to the north, north-east and south of the town have progressed on the plan period 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. Amend table 15 as follows: **Table 15 Major sites** Location Site name Total No of **Delivery** Development Current Plan Document Capacity units, beyond status 20192 2031 020-2031 1.200 Local Plan (JCS Rushden Rushden 2.500 1.300 New East Policy 33) 2,700 1250 1450 strategic site/SUE **Higham Ferrers** Land East of 300 300 0 **Higham Ferrers** Self Ferrers Neighbourhood contained Plan School strategic site allocation Irthlingborough 700 250 450**500** N/a - Resolution West of Strategic site/ SUE Huxlow 200 to grant School/ Irthlingborough West

							Strateg y JCS Annex A		
TOTAL	Major urban extensions	3,500 3,700	1,750	1,750 <u>1950</u>					
	20 19 20 , the outstandi				an areas nas beer	1			
• Co • Co 20- • Ma site	mpletions, 1 April 2011 mmitments (i.e. extant 19 <u>20</u> (2019 <u>20</u> AMR, Ho jor development sites (es identified in the 2018 e 16 as follows:	– 31 March planning per busing Site S (Table 16 5 , a	20 1920; missions c chedule); bove) plus	or previously allo	•				

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			953	83	31.5%	83	1,760	4 26
Rush	den	3,285	1,036	19	32.1%	175	1,515	540
Mark	et Towns	,						
	0. 1011110							
			358	12	66.1%	4		-114
High	am Ferrers	560	370	4	66.8%	3	300	-117
riigiii	ann i chcis	300	310		00.070	<u> </u>	300	-117
			283	37	23.7%	171	329	530
Irthlin	abarauab	1 250			_			
II UIIII	igborough	1,350	<u>320</u>	<u>27</u>	<u>25.7%</u>	<u>149</u>	<u>280</u>	<u>574</u>
			007	0754	00.50/	400		00
_			387	275 4	62.5%	466		68
Raur	lds	1,060	<u>662</u>	7	<u>66.9%</u>	<u>347</u>	0	4
			190	12	29.7%	486		-8
Thra	oston	680	<u>202</u>	<u>223</u>	<u>62.5%</u>	<u>260</u>	0	<u>-5</u>
			384	8	60.8%	7		176
Ound	lle	645	<u>392</u>	<u>3</u>	<u>61.2%</u>	<u>11</u>	70	<u>169</u>
			2,555	427 3	39.3%	1,197	2,459	942
TOTA	AL	7,580	2,982	23	<u>43.6%</u>	945	2,165	<u>1,165</u>

Amend and split paragraph 8.9 as follows:

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 dwellings) and housing commitments (1,256563 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.

Outstanding residual housing requirements have been identified at Rushden (426<u>540</u> dwellings), Irthlingborough (530<u>574</u> 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 **updated (2020)** urban housing Background Paper (BP9)¹⁴.

Amend paragraph 8.10 as follows:

For Rushden, commitments consist of extant planning permissions (63 dwellings and plus outstanding Neighbourhood Plan site allocations (560-total 315 dwellings); with 1,200 1,050 dwellings at Rushden East anticipated to be delivered by 2031. This equates to an outstanding requirement for 426-540 dwellings. A further 120-134 dwellings housing land supply is identified at specific unallocated brownfield sites within the urban area, equating to a residual requirement for 306 dwellings.

Amend paragraph 8.11 as follows:

For Irthlingborough, commitments for 500 429 dwellings are identified within the 2019-2020 housing land supply. A further 207-199 dwellings is included within the housing land supply, consisting of specific brownfield sites and other emerging sites which did not, as at 1 April 20192020, have planning permission. These emerging sites reduce the residual requirement to 323-375 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 250-200 (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.

Amend paragraph 8.12 as follows:

A residual requirement for a further 476-169 dwellings at Oundle is identified, where additional strategic land allocations are required to meet this target. This residual figure for 476-169 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 246 239 dwellings¹⁵, as a minimum.

Amend paragraph 8.13 as follows:

ge 31

Prepared for: North Northamptonshire Council

¹⁴ https://www.east-northamptonshire.gov.uk/downloads/file/12110/background_paper_9 - housing_requirements - urban_flink to updated BP9 to be added]

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 246239 dwellings for the latest (20192020) monitoring data.

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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.

Amend Table 17 as follows:

le 17: Rural areas residual housing requirement, as at 1 April 2019 2020	District rural housin requirement 2011-31
rural housing requirement 2011-31	•
al housing completions 2011- 18 19	-467 -
al housing completions 20 18 19-1920	-40
int planning permissions as at 1 April 20192020 (as shown in 20192020 AMR sing site schedule)	
al Plan/ Neighbourhood Plan site allocations (as at 1 April 2019 2020)	-90 -
rging Neighbourhood Plan site allocations, other emerging rural sites (>4 llings), as at 1 April 2019 2020	
IDUAL DISTRICT REQUIREMENT, AS AT 1 APRIL 20192020	-4:

Amend paragraph 8.14 as follows:

Table 17 demonstrates that the current Local Plan rural housing requirement for the district is already being met; indeed, exceeded by 43<u>76</u> 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 <u>updated (2020)</u> rural housing Background Paper (BP10)¹⁶.

Amend paragraph 8.15 as follows:

The rural housing requirement is already delivered (513-578 dwellings), committed (261-260 dwellings); or allocations in Neighbourhood Plans "made" since 1 April 2019-2020 (35 dwellings) and other emerging rural sites (54-58 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 (2019) NPPF (2021)

⁶ https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10 - housing_requirements - rural [Link to updated BP10 to be added]

			<u>update)</u> , 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).		
Page 313	Policy EN24	138	Policy EN24 to be deleted in its entirety as follows: Pelicy EN24: Oundle Housing Allocations 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: i) Land rear of Cemetery, Stoke Doyle Road — around 70 dwellings; and iii) — Cotterstock Road/ St Peter's Road — around 130 dwellings; and iii) — St Christopher's Drive — around 100 dwellings. Key considerations to be taken into account for each of the sites along with appropriate Local Plan policies are: 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.	Hearings Action Point 26	No likely significant effect.
MM50	Supporting text to Policy EN25	139 and 140	Add new text after paragraph 8.26, as follows: 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	To address recommendations of the HRA.	No likely significant effect since this incorporates the recommendations of the HRA and thus protects European sites

			current use of the site to determine if it does support a significant population ¹⁷ 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.		
MM51	Figure 14	140	Amend Figure 14 as follows: Text stating "longer term development potential" and accompanying arrow to be removed from Figure 14.	Hearings Action Point 41	No likely significant effect.
₩ ⁵² age 314	Policy EN25 Criterion b)	140	Amend Policy 25 as follows: 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, 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. 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.	Hearings Action Point 40	No likely significant effect.

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

MM53	Para 8.29	141	Amend para 8.29 to delete the final sentence and replace with the following sentence: 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 matters and other site-specific constraints. And insert a new para as follows: 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.	To address comments from Anglian Water (Rep 22/05)	No likely significant effect.
Page 315	Policy EN26	143	Amend Policy EN26 criterion d) as follows: Site Specifics Land at Cotterstock Road ¹⁸ , 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).	To address comments from Anglian Water (Rep 22/03, 22/04, 22/06)	No likely significant effect.

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

Pag			 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) 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). 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). 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. 		
Page MM 55	Policy EN27	145	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 to meet older persons' needs. 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. Consideration may be given to the provision of an emergency access via Ashton Road.	To address comments from Anglian Water (Rep 22/07, 22/08) Hearings Action Point 73 Hearings Action Point 43	No likely significant effect.

			d) Connections will be provided to the adjacent Public Rights of Way network, providing access to the Nene Way and adjacent villages (e.g. Ashton, Barnwell and Polebrook). e) Structural landscaping will be provided for the site boundary, to mitigate the impacts of noise and other pollution from the A605. f) The design and layout should consider the proximity of the foul pumping station ¹⁹ . to reduce the risk of nuisance/ loss of amenity associated with the operation of this. And add footnote: 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		
Page 317	Paras 8.35 to 8.39	145-146	Amend paragraph 8.35 as follows: 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 204920 AMR ²⁰ , indicates the following: • Irthlingborough West – 250200 dwellings, 20267-2031; and • Rushden East – 1,200050 dwellings, 20223-2031. Amend paragraph 8.36 as follows: The April 204920 trajectories for the two sustainable urban extensions equate to a combined reduction of 8501,050 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.	To update with 2020 monitoring information.	No likely significant effect. These changes simply reflect the latest position with housing delivery

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-2019-24/2 http://www.nnjpdu.org.uk/publications/north-northamptonshire-authorities-monitoring-report-19-20/2 http://www.nnjpdu.org.uk/publications/amr-2018-19-assessment-of-housing-land-supply-2019-24/2 http://www.nnjpdu.org.uk/publications/amr-2018-24/2 ht

			Amend the final sentence of paragraph 8.38 as follows:		
			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 204920).		
			Amend paragraph 8.39 as follows:		
Page 318 MM57			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 244-247 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 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.)		
MM57	Supporting text to	147-149	Add new text after paragraph 8.46, as follows:	To address recommendations of	No likely significant effect since this
	Policy		The site is located approximately 3.5km from the Upper Nene Valley Gravel Pits SPA, it is	the HRA.	incorporates the
	EN28		therefore possible it could constitute functionally linked habitat for the SPA. The applicant will		recommendations of
			be required to provide evidence that the development will not result in an adverse effect on		the HRA and thus
			the integrity of Upper Nene Valley Gravel Pits SPA/Ramsar. To achieve this, surveys will be		protects European
			required to determine habitats and current use of the site to determine if it does support a		sites
			significant population ²¹ 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		

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

			Regulations Assessment to ensure that the development does not result in adverse effects on		
			integrity'		
MM58	Policy EN28	149	Amend Policy EN28 as follows: 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.	To address comments from Bellway Homes (Rep 26/05)	No likely significant effect
			A design led masterplan is to be agreed by the local planning authority as part of the application prcess, which will address all relevant policy requirements. The key principles of the proposed development will deliver the following:		
			a) Up to It is expected that the proposed allocation will deliver around 450 dwellings;		
Page 319			 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; 		
31 <u>9</u>			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 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. 		
			 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.		
MM59	Policy EN29	150	Amend Policy EN29 as follows: 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 targetminimum 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.	Hearings Action Point 63, 64, 66	No likely significant effect
Page 320	Policy EN30	153	Amend Policy EN30 as follows: 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.	Hearings Action Point 67	No likely significant effect
MM61	Supporting text to Policy EN31	156	Add new supporting text at the end of paragraph 8.71 as follows: 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		No likely significant effect

			 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 		
MM62	Policy EN31	157	Amend Policy En31 as follows: 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.	Hearings Action Point 68, 69, 70, 71,72	No likely significant effect
Page 321			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 35, 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:	To address comments from Bellway Homes (Rep 26/08)	

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- 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 part of a retirement housing scheme and mayinclude communal facilities and on site management.
- c) Supported Housing for Older People Extra Care:
 - i. SUEs and Strategic Sites

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.

- ii. Allocated sites
 - 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.
- 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.

²² Rushden Neighbourhood Plan Policy H2F

²³ Higham Ferrers Neighbourhood Plan Policy HF.H4

MM63	Policy EN32	161-162	Amend Policy EN32 as follows:	Hearings Action Point 76 and Post Hearings	• •
			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.	Letter	
			a) <u>Self build housing</u>		
			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. 		
П			b) <u>Custom build housing</u>		
Page 323			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:		
			 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. 		
			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.		

MM64	Table 21,	163-164	Amend paragraph 8.93 as follows:			Factual correction	No likely significant
	paras 8.96			and update in	effect		
	- 8.97		The 2019 GTAA estimates that across N				
			the planning definition, with a significant				
			At a district level, the GTAA identified 73				
			undetermined. Additionally, a further 4 definition.	travelling Snowpeople nousenold	s were identilled triat meet tr	le national	
			The GTAA (2019) identified no gypsy				
			undetermined households who may undetermined households who may under the planning definition. Four travelling	-			
			definition.	ig anowpeople nousenolus wen	e identilied who met the pi	<u>ammy</u>	
כ			Amend table 21 as follows:				
			Table 21: Identifiable needs for Gyp	sy, Traveller and Travelling Sho 2033	wpeoples' accommodation	2018-	
			No. of identified households in need th	nat meet the planning definition		4	
			No. of undetermined households in ne	ed that may/ may not meet planni	ng definition	17	
			No. of identified households in need th	nat do not meet the planning defini	ition	7	
			TOTAL			28	
			Table 21: Identifiable needs for Gyps				
			Status	Identified need 2018-31	Identified need 2031-	2033	
			Gypsies and Travellers				
			Meet Planning Definition	<u>0</u>	<u>0</u>		
			<u>Undetermined</u>	<u>14</u>	<u>3</u>		
			Do not meet Planning Definition	<u>11</u>	<u>0</u>		
			Travelling Showpeople				
			Meet Planning Definition	<u>6</u>	<u>0</u>		
	1		Undetermined	0	0		

Do not meet Planning Definition	<u>0</u>	<u>0</u>	
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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.

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.

Amend paragraph 8.98 as follows:

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 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. 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.

Delivering Sustainable Urban Extensions

MM65	Para 9.1 – 9.5	165-166	these progressively diminis	nnex A), made provision lings) and accompanying within the District during to orts (2017, 2018—and, 2 hing; such that as at 1 A d come forward at the twarison between the 2016 ort) positions.	gjobs, facilities and service the Plan period. Trajectorion 2019 ²⁴ and 2020) have se pril 2019-2020 it is currentl o sites by 2031 (47 <u>15</u> % of	es at the two Sustainable es for SUEs in subsequent en the anticipated delivery a ly forecast that just the total requirement). Table	No likely significant effect, these changes simply reflect the current position with housing delivery rather than changing the overall quantum of housing to be delivered over the plan period
ည်			Table 22		Anticipated delivery	by 2031	
Page 326			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 for The Joint Core Strategy (Postrategic development proposed to be delivered over the durare currently anticipated to Amend paragraph 9.5 as for the durance of the paragraph 9.5 as for the durance of the paragraph 9.5 as for the paragraph 9.5 as f	olicy 33) provides a composals to the east of Rushration of the next 20 year come forward by 2031.	nden. This Sustainable Ur	ban Extension is anticipated	

			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.	
			Add new paragraph after paragraph 9.7: 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.	
Page 327	Policy EN33	168-169	Amend Policy EN33 as follows: 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, above identifies the development boundaries for the delivery of the Rushden East Sustainable Urban Extension (SUE). This development, also known as High Hayden Garden Community, 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 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. Figure 18 (above) expands upon the policy guidance for Rushden East, provided in the Joint Core Strategy	No likely significant effect. This policy change adds greater clarity, some of which (regarding SANG) clarifies mitigation requirements for Upper Nene
			and the broad location for the Sustainable Urban Extension (as shown in figure 23 of the Joint Core Strategy). 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 site to inform future planning applications and will ensure a comprehensive approach to site delivery. 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	Valley Gravel Pits SPA/Ramsar

planning applications Planning applications will be required to be broadly consistent with the MFD and the principles of the Government's Garden Communities initiative.

pProposals for development will be granted planning permission where they are consistent with the relevant policy expectations and guidance set out in the MFD listed below. Further detailed guidance and illustration on how these policy expectations might be met is set out in the MFD. The MFD accords with the adopted Joint Core Strategy Policy 33 to ensure a comprehensive approach to site delivery.

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 shown on Figures 2.3 and 2.38 in the MFD, 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. <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>
 - <u>Traffic signals provided to control vehicular traffic and allow for safe pedestrian and cycle movement;</u>
 - 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 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.
- 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:

- 2. 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 in line with Figure 2.2 of the MFD.
 - 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.
- <u>Suitable Alternative Natural Greenspace (SANG) of approximately 21 hectares</u>, 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. <u>Provision of a new Town Park (of approximately 3.6ha).</u>
- 14. 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
- 15. <u>Provision of a Cemetery (approximately 2ha) with access, parking and relevant supporting infrastructure in line with MFD Figure 2.2.</u>

	16. Provision of allotments in the northern and southern neighbourhoods (approximately 2.20ha) in line with MFD Figure 2.2. 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
Page 33:	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. 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, (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
31	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.

Town Strategies

MM67	Para 10.10		Amend para 10.10, 2 nd sentence as follows: Policy EN34 sets out a framework for assessing development opportunities within and around the wider	Hearings Action Point 109, 110	No likely significant effect
			town centres, as and when these arise.		
MM68	Policy EN34	174	Amend Policy EN34 as follows:		No likely significant effect

Page 332			Raunds and Thrapsto sustain and enhance vi opportunities arise with a) Maintain a mix both economic b) Consolidate an active frontage c) Improve the le time - econom d) Seek to Imple landmark featu strategies or n e) Seek enhance employment a f) Encouraging a with a focus o as urban tree Development opportuni	isure and cultural offer of each town to provide for the growies; ment high quality public realm improvements, including the pures, within town centres especially addressing gateway sit eighbourhood plans; ments to pedestrian connectivity both within town centres reas beyond; and a step change in the quality of urban design, providing so In low carbon energy solutions, through measures including planting. ties will be informed by the preparation of town strategies,	n, by increasing footfall to akeholders where allowing outcomes: cial interaction, including mancements to identified the of both day and night the development of new tes, as identified in town as, and to residential and sustainable development of green initiatives such		
MM69	Table 24	176	Remove third column of Spatial parts of Rushden and Higham Ferrers Core urban area		Relevant spatial strategy policies Policy EN1(1) (a); JCS Policy 11(1)(a)	No likely significant effect	

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			 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 			
Page 333		Rushden West (employment area)	 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)		
<u></u>		Rushden East (Sustainable Urban Extension)	 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 	JCS Policy 33		
		Avenue Road/ Bedford Road/ Newton Road	 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) 	JCS Policy 11(2) (a) Neighbourhood Plan Policy H1		

F	1	1			4	
			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			
мм70 Раде 334	Policy EN35	180	Amend Policy EN35 as follows: Redevelopment proposals for the Splash Pool and Wilkinson sites together with the associated highways network, as shown as an area of opportunity in figure 21 above, on the Policies Map 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 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) 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; e) 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.	Hearings Action Point 113, 114, 115 To address comments from Historic England (SOCG) (e) (Rep 39/08) and Anglian Water (f) (Rep 22/13)	No likely significant effect	

MM71	Policy EN36 supporting text	181-182	Add new text after para 10.25 to form a new para as follows: 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.	To address recommendations of the HRA.	No likely significant effect since this incorporates the recommendations of the HRA and thus protects European sites
MM72	Para 10.30	183	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.	To address recommendations of the HRA.	No likely significant effect since this incorporates the recommendations of the HRA and thus protects European sites
MM73	Policy EN37	184	Amend Policy EN37 as follows: 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	To address comments from Historic England (SOCG) (f) (Rep 39/09) and Anglian Water (g) (Rep 22/17)	No likely significant effect

			f) The preservation heritage impact	lopment contributions for education and training, to offset the loss iness premises; n and enhancement of the heritage assets on the site, in accorassessment and ng of suitable access for the maintenance of foul drainage infra	rdance with a		
MM74	Table 25 After Para 10.42	189	Amend Table 25 as follows Spatial parts of Irthlingborough Core urban area (existing)	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	Relevant spatial strate policies Policy EN1 (1 (b): JCS Polic 11(1) (b))	No likely significant effect
Page 336			Irthlingborough West (Sustainable Urban Extension) Irthlingborough East	Permitted major extension to main urban area Will enable new Finedon Road (A6) and Wellingborough Road connections Former principal employment and leisure hub Separated from main urban area by A6 Bypass	Policy EN1 (1 (b) JCS Polici 11(1) (b)/Ann A Policy EN1 (1	y 9 ×	
				 Separated from Hain urban area by Ao 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 	(b): JCS Polic 11(1) (b)	Y	
			Crow Hill (lower)	 Ribbon development along Addington Road Separated from main urban area by A6 Bypass Characteristically suburban, but with rural elements e.g. Bypass Farm/ butchers 	Policy EN4: J Policy 11(2) (

			Crow Hill (upper) 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		
мм75 Раде 337	Policy EN39	192	Amend Policy EN39 as follows: 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) Enhancements Preservation and enhancement to the settings of the heritage assets, with particular reference to St Peter's Church and the Louisa Lilley Almshouses"	To address comments from Historic England (SOCG) (Rep 39/10)	No likely significant effect
MM76	Supporting text to Policy EN40	194	Amend para 10.52 as follows: 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 stadium site is surplus to requirements), in	Request for Note after Hearings resulting in text change (AP 118) To address rep by Sport England	No likely significant effect since this incorporates the recommendations Natural England advice and thus protects European sites

Page			accordance with NPPF paragraph 979. Account should also be taken of the findings of any subsequent Playing Pitch Strategy. 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. Add new text after paragraph 10.54 as follows: 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.	To address comments from Natural England (Rep 48/08)	
Фим77 ОО	Policy EN40	194	Amend Policy EN40, as follows: 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 pedestrians and cyclists crossing the A6 to Station Road and accessing the town centre (east)		No likely significant effect

1 M78 200 339	Para 10.57	195	g) h) i) Amend participation of the connected (below) of the connect	Design, height and the setting of nearby and non-designated Provision for new management of the loss be demonstrated to the NPPF ara 10.57 as follows: and its surrounding rud villages of Ashton, utline the main characeuilt up area included.	I massing together with high quality landscaping, recognising properties of heritage assets, such as Irthlingborough Bridge and Crow Hill I heritage assets, and oorings along the River Nene Navigation allowing direct riparian as of the stadium, playing pitches and ancillary facilities, unhat the facilities are surplus to requirements in line with parallel, Cotterstock, Glapthorn and Stoke Doyle. Figure 28 are acteristics of each, with the relevant spatial strategy policy refere as parts that are situated within the parishes of Ashton (Elmonwell Mill; Barnwell Country Park; Oundle Marina) and Glager and the connection of the country Park; Oundle Marina) and Glager models.	protecting ron Age Fort access, and less it can agraph 99 of sely nd Table 26 nces. The ington;	Histor (SOC) 39/11) To add Sport To add comm by Ou	ents from ic England G Rep dress rep by England dress ents made ndle Town sil (Rep	No likely significant effect	
MM79	Table 26 After Para 10.57	196	Amend T	Table 26 as follows:			1	dress ents made ndle Town	No likely significant effect	
				Spatial parts of Oundle Historic core	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	Relevant spatial strategy policies Policy EN: (1)(c); JCS Policy 11(f)	25/08) Hearin	el (Rep		

		T		1			_
			 Hosts main employment areas – <u>Main employment</u> areas situated to the east of the historic core of <u>the town</u> - Nene Business Park/ Fairline Boats; East Road 				
		Oundle north	 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 	(1)(c); JCS	-		
		Oundle Marina/ Barnwell Country Park	 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 	(3)(a); JCS	•		
		Elmington/ Laxton Drive (Ashton Parish)	 Ribbon development along A605 Separated from main urban area by A605 Bypass Suburban element (Laxton Drive) Riverside Hotel presents redevelopment challenge 	(3)(a); JCS	•		
Para 10.60 and 10.61	198	Planning permission for the capark to a mixture of office, ligand car park adjacent to the The former recycling centre var park is well used on most Amend para 10.61 as follows: While both the The recycling	nange of use of the former Recycling Centre and Council car park at industry and storage was granted in 2014. The former recycling Joan Strong Centre has undergone some changes in recent as occupied by North Equipment Ltd in 2016, while the adjacent Hworking days, particularly market days.	g centre years. Herne Park	To address comments made by Oundle Town Council (Rep 25/9 & 25/10)	No likely significant effect	
			Oundle Marina/ Barnwell Country Park Elmington/ Laxton Drive (Ashton Parish) Para 10.60 and 10.61 Planning permission for the clear to a mixture of office, light and car park adjacent to the The former recycling centre we car park is well used on most Amend para 10.61 as follows: While both the The recycling of the Country Park to a mixture of office, light and car park adjacent to the The former recycling centre we car park is well used on most	Oundle north Oundle north 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 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/ Elmington/ Ribbon development along A605 Separated from main urban area by A605 Bypass Suburban element (Laxton Drive) Riverside Hotel presents redevelopment challenge Para 10.60 and 10.61 Amend para 10.60 as follows: Planning permission for the change of use of the former Recycling Centre and Council car park Park to a mixture of office, light industry and storage was granted in 2014. The former recyclin and car park adjacent to the Joan Strong Centre has undergone some changes in recent The former recycling centre was occupied by North Equipment Ltd in 2016, while the adjacent in car park is well used on most working days, particularly market days. Amend para 10.61 as follows: While both the The recycling centre and former Council car park could provide development op.	Oundle north 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/ Separated from main urban area to the north (Oundle/ Glapthorn Parish), but recognise concerns regarding potential coalescence with Glapthorn Oundle Marina/ Separated from main urban area by River Nene Separated from main urban area by River Nene Further opportunities e.g. Barmwell Mill Elmington/ Separated from main urban area by A605 Bypass Separated from main urban area by A605 Bypass Separated from main urban area by A605 Bypass Suburban element (Laxton Drive) Separated from main urban area by A605 Bypass Suburban element (Laxton Drive) Riverside Hotel presents redevelopment challenge Para 10.60 as follows: 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. The former recycling centre and car park adiacent 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. Amend para 10.61 as follows: While both the The recycling centre and former Council car park ceuld provide development opportunities,	Amend para 10.60 as follows: Amend para 10.61 as follows:	Para 10.60 and 198 Amend para 10.60 as follows: Amend para 10.61 as follows: Amend pa

			situated within the urban area. Future development proposals If either site becomes available in the longer term, any potential redevelopment scheme would 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). Future development proposals could be supported through site specific development briefs. 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.		
MM81	Policy EN41	200	Amend Policy EN41 as follows:	Hearings Action Point 120	No likely significant effect
			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;		
Ϋ́			Training facility and/ or resource centre; or		
Page 341			Small business units, or other potential service employment uses.		
ယ			Redevelopment schemes should deliver the following outcomes:		
4			a) Retention 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.		

MM82	Table 27 After Para 10.68	202				Hearings Action Point	No likely significant effect
			Table 27				
			Spatial parts of Raunds	Characteristics	Relevant Spatial strategy policies		
Pa			Core urban area	 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 EN (b); JCS F 11(1)(b)		
Page 342			Raunds north	 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 EN (b); JCS F 11(1)(b)	` '	
			Raunds north east	 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 EN (b); JCS F 11(1)(b)	` '	
			Raunds south	 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 EN (b); JCS F 11(1)(b)		

			Warth Park (west of Raunds) Brooks Road	 Main employment area of Raunds Major strategic warehousing and distribution site Also includes significant new green infrastructure be warehouses and A45 Ribbon development along Brooks Road, beyond No End Suburban character Transition between urban (Northdale End) and rural Farm Livery Stables) 	orthdale	Policy EN (b); JCS F 11(1)(b) Policy EN (a); JCS F 11(2)(a)		
MM83	Table 28 After Para 10.72	204	Amend Table 28 as Spatial parts of Thrapston and Islip	follows: Characteristics	Relevant	-	Hearings Action Point	No likely significant effect
Page 343			Core urban area	 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 Road, Lazy Acre) Includes key services and facilities – town centre retailing, school, main public open spaces, leisure centre 	Policy EN JCS Polic	V1(1)(b); cy 11(1)(b)		
			Haldens Parkway (employment area)	 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 	Policy EN JCS Polic	V1(1)(b); cy 11(1)(b)		
			Islip village	 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 	Policy EN JCS Polic	V1(2)(b); cy 11(2)(a)		
			Islip south	 Linear area, west of River Nene, situated between Kettering Road and A14 Major strategic employment site, including Islip Furnace and Primark premises 	EN1(3)(a	N1(2)(b) & i); cy 11(2)(a)		

MM84	Para 10.83	207-208	Linear/ ribbon development part of Islip village to the south of Kettering Road, separated from Islip village by cricket field/ Woolpack pub Add new text after paragraph 10.83, as follows: 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.	To address recommendations of the HRA.	No likely significant effect since this incorporates the recommendations of the HRA and thus protects European sites
Page 344	Policy EN42	209	Amend Policy EN42, as follows: 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) Enhancements - 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.	To address comments from Historic England (SOCG) (Rep 39/12)	No likely significant effect

Monitoring and Implementation

Page 345	Para 11.4	210	Amend paragraph 11.4 (including amending bullet point 3 and introducing a new bullet point after bullet point 3)) as follows: 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: Bullet point 3: • Education – delivery of new academies/ free schools, working with the Department for Education, in accordance with current local education authority ²⁵ and national ²⁶ policies. New bullet point: • 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;	Northamptonshire County Council (Development Infrastructure) (Rep 49/04, 49/10)	No likely significant effect
MM87	Table 29	214 to 219	Amend table 29 as follows:	Hearings Action Point 178	No likely significant effect

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

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

 $^{{}^{25}\,\}text{NCC School Organisation Plan 2016-21: }\underline{\text{https://www3.northamptonshire.gov.uk/councilservices/children-families-education/schools-andeducation/school-admissions/Documents/School%20Organisation%20Plan%202016-2021_2017%20Update.pdf}$

²⁶ Planning for Schools Development (2011): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf

Page 346	Table 29: Policy EN1	Performance indicato Objective Provide additional rural spatial direction/ settlement hierarchy (i.e. large/ small/ restraint villages and open countryside)	Indicator 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	Targets 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
246	EN2	Provide a clear differentiation between the urban/ built up areas and their surrounding rural hinterlands Provide development principles to guide development in the rural area. Provide a clear differentiation between the freestanding	Number of dwellings permitted within the main urban areas, and beyond the main urban areas Location and type of development Number of dwellings permitted within the free standing villages,	schemes Restrict inappropriate development beyond the main urban/ built up areas Restrict inappropriate development beyond the free standing villages	All proposals to meet the requirements of the policy.

	T			T	T	
			surrounding rural	free standing		
			hinterlands	village areas		
		EN		Number of	Restrict inappropriate	
			differentiation	dwellings permitted	development in the	
			between urban	within the ribbon	defined ribbon	
			outliers/ ribbon	development areas	development areas	
			developments and	of lower Crow Hill		
			their surrounding	(Irthlingborough)		
			rural hinterlands	and Brooks Road		
				(Raunds)		
		EN	5 Protect the	Development	Restrict inappropriate	No inappropriate
			peripheral land of	permitted outside	development on the	development on the
			settlements against	of the defined	periphery of	periphery of
			unsuitable	settlement	settlements with a	settlements, other
			development and	boundaries:	defined boundary, but	than for rural
			provide suitable	number of rural	encourage the	exceptions.
<u> </u>			development	affordable units	provision of	
Page 347			management	achieved (Rural	affordable housing to	
8			criteria for Rural	Exceptions and	meet identified needs	
T			Exceptions Housing	open countryside	in the rural areas	
ນ			schemes	dwellings)		
-4		EN	6 Provide clear	Number of	Restrict the	No inappropriate
7			guidelines for	dwellings permitted	development of	new build
			appropriate	and/ or built in the	inappropriate new	replacement
			replacement	open countryside	build replacement	dwellings in the
			dwellings in open		dwellings in open	open countryside
			countryside		countryside	other than those
			,		,	which accord with
						Policy EN6.
		EN	7 Protect and	Net loss/ gain in GI	NetTo increase in	Overall net gain in
			enhance existing	across the district	connected open	GI.
			and future Green	New open space	space and GI	
			Infrastructure	provided within or	throughout the district	
			corridors	connected to the	an sagnout the district	
			Comacia	existing GI network		
<u> </u>				CAISTING OF HETWORK		

$\overline{}$							1
				Projects to			
				enhance GI in the			
		=110		district		In a reason in the	
		EN8	Protect and	Number and	Complete the	Increase in the number of GI	
			enhance the	amount of	Greenway within the		
			Greenway and its	contributions by	district	projects completed.	
			connections to the	developers and		Completion of the	
			wider GI network	other funding		Greenway and	
				streams		associated projects.	
				Completion of			
				Greenway projects/			
				developments			
		EN9	Define an enhanced	Designation of	No loss of Local	No loss of Local	
			local interpretation	Local Green Space	Green SpaceTo	Green Space.	
			of the NPPF criteria	within	facilitate the	Not increase in	
סַן			for the designation	Neighbourhood	protection of Local	Net increase in Local Green Space.	
B			of Local Green	Plans	Green Space	Local Green Space.	
₩			Space				
Page 348		EN10	Enhance existing	Number of	Net increase in open	Net increase in	
4			open space or	permitted	space across the	open space across	
φ			provide new open	developments of	district	the district.	
			space	10 or more	To ensure new		
				dwellings, or 0.3 or	development makes	No net loss of open	
				more hectares	adequate provision	space.	
					for open space.		
		EN11	Enhance existing	Number of	Net increase in sport	Net increase in	
			sport and recreation	permitted strategic	and recreation	sport and	
			facilities, or provide	developments	facilities across the	recreation facilities	
			new sport and	Amount of new	district To ensure	provided/ increase	
			recreation facilities	sports and	new development	in improvements	
				recreation	makes adequate	towards existing	
				facilities	provision for sports	facilities.	
				provided/	and recreation		
				contributions	facilities.	No net loss of sport	
				secured toward		and recreation	
				facilities.		facilities.	

	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	To enable and promote healthy lifestyles. Submission of Health Impact Assessments to accompany all major planning applications. Refusal of planning permission where insufficient mitigation is proposed to address negative health impacts.	All major applications to be accompanied by a HIA.	
Page 349	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. 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.	
	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 Maintaining Heritage Assets Maintaining non designated Heritage Assets	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	

	1	1		ı	T			
					Change in areas		at risk (number on	
					designated for		Historic England's	
					their intrinsic		Heritage at Risk	
					<u>environmental</u>		Register)	
					value including			
					sites of			
					international,			
					national, regional,			
					sub regional or			
					local significance			
			EN15	Sustain and	Number of	Restrict inappropriate	Maintain non-	
			LIVIO	enhance the	permissions and	development which	designated heritage	
				appearance and	refusals where the	affects a non-	assets (no loss).	
				setting of non-	policy was used to	designated heritage	<u>assets (110 1055).</u>	
				_	make the decision	-		
╆				designated heritage	make the decision	asset or its setting		
Page 350				assets	N	_		
Φ			EN16	Provide clear	Number of	Encourage	A net increase of	
Φ				direction for tourist	permitted tourist	appropriate	tourist/ cultural	
<u>မှ</u>				and cultural	and cultural	development in the	<u>facilities</u>	
\mathcal{L}				developments in the	development within	Nene Valley corridor		
$lue{}$				Nene Valley corridor	defined Nene	and Rocking Forest		
				and Rockingham	Valley and	areas, including the		
				Forest areas and	Rockingham	conversion of		
				support the	Forest areas	redundant small-		
				conversion of small-		scale rural buildings		
				scale redundant or	Number of			
				disused rural	permitted			
				buildings to guest	conversions of			
				house/ B&B	rural outbuildings			
				accommodation	to provide			
					overnight			
					accommodation			
			-EN17	Implementation of	Development of	To deliver new SEN		
				SEN school	SEN school	school development		
				proposal at Land	proposal permitted	to meet the needs		
				west of Moulton	1 -1	and requirements of		
				College, Chelveston		aa roquironionio or		
			1					

	Т		T	T		 	1
			Road within the		the Friars East		
			Plan period		Academy		
		EN18	Set out policy	Number of	Encourage	A net increase in	
			criteria for the future	developments	established	the number of	
			development/	(future sites/	businesses to expand	completions for	
			expansion of	expansion of	and grow in	small and medium	
			commercial	existing premises)	appropriate locations	scale commercial	
			floorspace (e.g. by	successfully	' ' '	development.	
			way of the	implemented in		<u></u>	
			development of	accordance with			
			further enterprise	Policy EN18			
			centres or similar)	1 oney Entre			
		EN19	Ensure that existing	Use status of the	No To prevent the	No net loss of	
		LINIS	employment sites	sites	loss of employment	employment uses	
				Siles	uses within the	within the Protected	
			are protected for		Protected		
			employment use			Employment Areas	
U					Employment Areas	unless the site is	
φ					unless the site is	demonstrably no	
Page 351					demonstrably no	longer suitable for	
					longer suitable for	<u>employment</u>	
$\frac{\partial \mathcal{L}}{\partial \mathcal{L}}$					employment		
 		EN20	Provide clear	Number of	Encourage	<u>All</u>	
			direction for the	permissions and	established	expanded/relocated	
			relocation and	refusals where the	businesses to expand	business to be	
			expansion of	policy was used to	and grow in	adjacent to built up	
			existing businesses	make the decision	appropriate locations	area.	
		EN21	Increase the vitality	Public realm	Encourage	Increase the	
			of the town centres	improvements	appropriate	percentage of town	
			and primary	within the town	development within	centre development	
			shopping	centres and	the town centres and	within defined	
			areas frontages	primary shopping	primary shopping	boundaries.	
				areas frontages	areas frontages		
						Decrease the	
				Percentage of		number of	
				development			

	1 1	1					1	1	
					within defined		vacancies at upper		
					town centre		floor level.		
					<u>boundaries</u>				
					Change of use of		Increase the		
					upper floors		percentage of retail		
					upper noors		uses within primary		
					Change of use to		frontage/ decrease		
					residential (non-		non-retail uses in		
					primary frontage)		frontages.		
					primary montager				
					Percentage of				
					non-retail within				
					primary frontages				
			EN22	Provide floorspace	Number of	Restrict inappropriate	No specific target,		
			21122	thresholds for	permitted retail	retail development	however,		
10				impact	developments	outside the primary	monitoring		
တ်				assessments for	outside the primary	shopping areas of the	indicator to identify		
Φ				retail developments	shopping areas of	six towns	the number and		
Ψ				retail developments	the six towns	SIX LOWITS	type of these		
မွာ					the six towns		developments.		
Page 352					Duamanala fau aut		ueveropments.		
					Proposals for out		4000/		
					/ edge-of centre		100% of proposals		
					supported by a		for out / edge-of		
					sequential test		centre supported by		
					and an impact		a sequential test		
					<u>assessment</u>		and impact		
					where above the		assessment above		
					<u>relevant</u>		the relevant		
					<u>threshold</u>		<u>threshold</u>		
			EN23	Provide clear	Number of	Encourage specified	<u>100%</u>		
				direction for	permitted specified	main town centre	adjoining/closely		
				specified main town	main town centre	uses <u>at</u> outside of the	related to built up		
				centre use	uses <u>adjacent</u>	local centres that	area;		
				developments at	towithin 200m of	offer day to day local			
				outside of the local	the local centres	services, improved	Amount of new		
				centres		connectivity and do	floorspace for each		
						•	type of use		
	1	l l	1		ı			1	

		T			T
				not affect local	
				amenity	
	EN24	Delivery of sites in	Meeting overall	To provide for	
		accordance with the	strategic housing	strategic shortfall in	
		Local Plan (Joint	requirements at	housing numbers of	
		Core Strategy)	Oundle and	around 300 dwellings	
		requirements	delivery of	at Oundle	
			associated		
			infrastructure		
	EN25	Implementation of	Meeting strategic	To provide site	Delivery of the site
		Stoke Doyle Road	housing	specific housing	by 2031
		site within the Plan	requirements site	requirements	
		period	specific	assisting the strategic	
				shortfall at Oundle	
	EN26	Implementation of	Meeting strategic	To provide site	Delivery of the site
		Cotterstock Road	housing	specific housing	by 2031
п		site within the Plan	requirements site	requirements	
Š		period	specific	assisting the strategic	
2				shortfall at Oundle	
,	EN27	Implementation of	Meeting strategic	To provide site	Delivery of the site
Doce 353		St Christopher's	housing	specific housing	by 2031
3		Drive site within the	requirements site	requirements	
		Plan period	specific	assisting the strategic	
				shortfall at Oundle	
	EN28	Implementation of	Meeting strategic	To provide site	Delivery of the site
		Land east of A6	housing	specific housing	by 2031
		Bypass/ Bedford	requirements site	requirements	
		Road site within the	specific	assisting the strategic	
		Plan period		shortfalls for	
				Rushden and	
				Irthlingborough	
	EN29	Delivery of an	Number of	Delivery of 5% of	Delivery of 5% of
		appropriate	Category 3	units as Category 3	units as Category 3
		quantum of	(wheelchair	housing on sites of	housing on sites of
		Category 3	accessible <u>or</u>	50 dwellings or more	20 dwellings or
		(wheelchair	adaptable) units	To increase the	more
		accessible <u>or</u>	delivered		

		adautable) becasis		delivery of Cotesses		
		adaptable) housing		delivery of Category		
		to meet local needs		3 housing	4000/ !	
	EN30	Delivery of an	Type, mix and	Encourages a range	100% in accordance	
		appropriate mix of	range of units	and mix of house	with tenure/ size	
		housing sizes, types	achieved	types and tenures to	proportions set out	
		and tenures to meet		meet the needs of the	in the evidence	
		local need	Proportion of 1, 2,	wider community in	base, unless	
			3, 4, 5+ bed	accordance with the	justified by	
			properties.	evidence base	<u>evidence</u>	
			Tenure split of			
			properties			
	EN31	Delivery of	Numbers of older	Delivery of 10% of	Delivery of 10% of	
		specialist housing:	persons (and	units as housing for	units (20% in rural	
		Older persons	specifically Extra	older people, in	area) as housing for	
)		accommodation	Care) units of	accordance with	older people, in	
		to meet local	accommodation	defined policy	accordance with	
		need	achieved on sites	thresholds	defined policy	
		Extra Care	over and above the	anconordo	thresholds	
í I I		development schemes as	defined policy	Delivery of Extra	<u>σσσ.ασ</u>	
		part of major	thresholds	Care housing in	Delivery of Extra	
		strategic sites in	tilicoriolas	association with	Care housing in	
		accordance with	Successful delivery	development in	association with	
		local needs	of Extra Care	accordance with	development in	
			housing at named	policy criteria at	accordance with	
			sites in accordance	named sites:		
				• Rushden East	policy criteria at	
			with development	SUE	named sites: Rushden East	
			masterplans		SUE	
				West SUE	• <u>Irthlingborough</u>	
				 St Christopher's 	West SUE	
				Drive, Oundle	St Christopher's	
				 East of Ferrers 	Drive, Oundle	
				School, Higham	• Hayway,	
				Ferrers	<u>Northamptonton</u>	
				To increase delivery	Road, Rushden	
				of specialist		

	 1	1			1	
				housing for older persons.	East of Ferrers School, Higham Ferrers	
	EN32	Delivery of self and custom build	Number of self and custom built dwellings achieved on sites of 50 dwellings or more	At least 5% of plots on sites of 50 dwellings or more safeguarded for self or custom built dwellings-To increase delivery of self and custom build housing.	At least 5% of plots on sites of 50 dwellings or more provided for self or custom built dwellings Meeting demand on self/custom build register	
Page 355	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 Masterplan Framework Document (MFD)	Meeting strategic housing requirements site specific Phased delivery of SUE in accordance with MFD phasing/ trajectories	Delivery of initial development phases by 2031 in accordance with the agreed MFD phasing plan/ trajectory and the housing trajectory for East Northamptonshire 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	
	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 Enhance vitality/viability of town centres	No of development proposals approved in accordance with all of the relevant policy criteria	Increased footfall in town centres Increase in the proportion of retail use in town centres Increase in proportion of town centre uses	

						Increase in the no of active frontages. Reduction in the no of vacancies in town centres	
		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	By 2031, redevelopment of the site as set out in Policy EN35.	
Page 356		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	By 2031, redevelopment of the site as set out in Policy EN36.	
		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	By 2031, redevelopment of the site as set out in Policy EN37.	

				appropriate mitigation		
	FNOO	1	D	measures	D 0004	
	EN38	Release and	Development	Redevelopment of	By 2031,	
		redevelopment of	permitted for	the site to include at	redevelopment of	
		the Rectory	housing on the	least 35 dwellings	the site as set out in	
		Business Centre	Rectory Business	with a mix of housing	Policy EN38.	
		site for housing	Centre site	types to meet local		
				need, developer		
				contributions,		
				improved		
				connections and		
				appropriate mitigation		
				measures		
	EN39	Redevelopment of	Development	Redevelopment of	By 2031,	
		the former Select &	permitted on the	the site to include a	redevelopment of	
		Save and St Peter's	former Select &	mix of main town	the site as set out in	
		Way Car Park site	Save and St	centre uses,	Policy EN39.	
)		vvay Oai i aik sile	Peter's Way Car	enhancement of the	I Olicy Litos.	
			Park site	primary shopping		
			ו מות אונכ	frontage, pedestrian		
,						
í				connections, suitable		
				service		
				arrangements, public		
				car parking, live-work		
				units at first floor or		
				above, and		
				enhancement to the		
				settings of heritage		
				assets		
	EN40	Redevelopment of	Development	Redevelopment of	By 2031,	
		the former Rushden	permitted on the	the site to include	redevelopment of	
		and Diamonds FC	former Rushden	flood compatible	the site as set out in	
		Stadium site	and Diamonds FC	employment uses,	Policy EN40.	
			Stadium site	appropriate flood		
				mitigation measures,		
				enhancements to		
				biodiversity, improved		

EN41 Redevelopment of the Riverside Hotel site EN41 Redevelopment of the Riverside Hotel site EN41 Redevelopment of the Riverside Hotel site EN42 Redevelopment of the Cattle Market site EN43 Redevelopment of the Cattle Market site EN44 Redevelopment of the Cattle Market site EN45 Redevelopment of the Cattle Market site EN46 Redevelopment of the Cattle Market site EN47 Redevelopment of the Cattle Market site EN48 Redevelopment of the Cattle Market site EN49 Redevelopment of the Cattle Market site EN40 Redevelopment of the Site as set out in Policy EN41.			T		T	T	I
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3. Conclusion

1.5 Following the analysis of the proposed Main Modifications to the Local Plan it can be concluded that they will not lead to likely significant effects on European sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the Local Plan. Indeed, some of the MMs (such as MM31, MM36, MM50, MM57, MM72 and MM84) strengthen and reinforce the conclusions of that HRA that the Local Plan will not have adverse effects on the integrity of any European sites.

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Appendix D

Schedule of Proposed Additional Modifications to the Submission Local Plan

Part 2 Local Plan

October 2022



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.

Ref No.	Para/	Public	Proposed Change	Reason for
	Policy/	ation		Change
	Figure/T	Plan		
	able/Ma	Page		
	p ref			

Contents

Contents Page	1-4	Contents page to be amended to reflect	ct the following Policy number changes:	Factual update
		Submission Policy Number To be added	Modified Policy Number To be added	
		References to Policy numbers through changes.	out the Plan will be amended to reflect the above	

Introduction

AM1	Index of figures and	8	The index of figures and tables to incorporate the list of appendices to the Plan by including the following after the list of tables on page 8:	For greater clarity
	tables		Appendices:	
			Appendix 1 Policy Index	
			Appendix 2 Economic Use Classes	
			Appendix 3 Employment Protection Areas	
			Appendix 4 Town Centres; Primary Shopping Areas and Local Centres	
			Appendix 5 Specialist and Older Person Housing Provision-Site selection and design	
			principles criteria	
			Appendix 6 Rushden East SUE Masterplan Framework Document	

AM2	Chapter	11-26	Updates to the chapter to reflect the stage in plan preparation and the latest factual position	Factual update
	1		on issues.	

Area Portrait

	Chapter 2	27-37	Updates to the chapter to reflect the latest factual position.	
AM3	Para 2.54	37	Amend para 2.54 as follows:	For greater clarity
			In the final sentence delete the word" future" and replace with emerging	-

Vision and Outcomes

AM4	Para 3.1	38	Amend text as follows:	Factual update
			As the North Northamptonshire Council <u>was</u> <u>will be</u> formed on 1 st April 2021, it will be a priority for the new unitary to update the Corporate Plan to set future priorities.	
AM5	Para 3.5	39	Amend first sentence as follows:	Consistency
			The Plan will aim to identify those aspects of the Joint Core Strategy Vision	
AM6	Para 3.7	41	Amend first sentence as follows:	Consistency
			This Plan will recognise the 10 overarching outcomes of the <u>Joint</u> Core Strategy	
AM7	Para 3.8	44	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	Consistency with NPPF 2021 (Action Point 5)
AM8	Para 3.9	44	3.9 The Joint Core Strategy has sought to define this within the context of North Northamptonshire (Policy 1). Policy 1 states that:	Hearing outcome

			When an aid aire a double mant man and the Local Diamina Authority will take a positive	/Astisus Daint
			When considering development proposals the Local Planning Authority will take a positive	(Action Point
			approach that reflects the presumption in favour of sustainable development contained in the	6)
			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.	
AM9	Para	45	This plan similarly fits within this strategic framework. All plan policies and decisions must be	Hearing
	3.10		made in accordance with the requirements of Joint Core Strategy Policy 1, such that	outcome
			proposals which conflict with strategic policies (i.e. Joint Core Strategy policies), this Plan or	(Action Point
			(where applicable) Neighbourhood Plans, should be refused unless material considerations	7)
			indicate otherwise. The Development Plan must be read as a whole, and planning	,
			applications will be determined in accordance with the Development Plan.	

Spatial Development Strategy

AM10	Para 4.9	48	Amend third sentence as follows:	Factual update
			Four years s Si nce adoption	
AM11	Para 4.37	60	Amend the reference to NPPF paragraphs as follows:	Factual update
			(paragraphs 7 <u>9</u> 8-79 <u>80</u>	
AM12	Para 4.44	62	Amend NPPF reference in the first sentence as follows:	Factual update
			The NPPF (paragraph <u>80</u> 79)	

1	AM13	Para	62	Amend NPPF reference in the final sentence as follows:	Factual update
		4.47		(NIDDE name words 707	
				(NPPF paragraph 7 <u>8</u> 7	

Natural Capital

AM14	Supporti ng text to	67	Amend final sentence of paragraph 5.9 as follows:	Improve readability/
	Policy EN7		Much of <u>the</u> 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.	consistency
	Para 5.9,		and the ment required to deriver an improved of hetherical and he are decired	Factual update
	5.13 and 5.14		Amend the first sentence of paragraph 5.13 as follows:	·
			The NPPF (paragraph <u>180</u> 175) recognises the importance of ancient woodlands and veteran trees as a key element of maintain the natural capital of the district.	
			Amend first sentence of paragraph 5.14 as follows:	
			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.	
AM15	Para 5.17	72	Amend paragraph 5.17 as follows:	Factual update
	Supporti		The made Neighbourhood Plans for Barrowden and Wakerley, Chelveston cum Caldecott,	
	ng text to		Higham Ferrers, Raunds, Ringstead and Warmington, plus the emerging Neighbourhood	
	Policy EN8		Plan for Ringstead, all include specific proposals for possible extensions and links to the Greenway, shown in Figure 8 (below).	
AM16	Para 5.18	74	Amend first sentence of paragraph 5.18 as follows:	Factual update
	Supporti ng text to		Local Green Space (LGS) is designated as a national land use in the NPPF (paragraphs 99-101-103).	

Policy EN9	Amend first sentence of paragraph 5.20 as follows:	
	The NPPF sets out specific criteria that would need to be met for land to be designated as	
	LGS (paragraph 10 92).	1

Social Capital

AM17	Para 6.16	88	Amend paragraph 6.16 as follows: 6.16 Policy EN12 (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 well being. It provides a mechanism for HIA to be incorporated into the development management system.	Hearings Action Point 124
AM18	Para 6.19	89	Amend first sentence of paragraph 6.19 as follows: The varied criteria set out in Policy 8 of the Joint Core Strategy relate to major a range of development schemes.	Factual update
AM19	Para 6.24	88	Amend paragraph 6.24 as follows: 6.24 The Joint Core Strategy contains an overarching policy for the protection of the historic environment (Policy 3 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 32 of the Joint Core Strategy, with regard to both designated and non-designated heritage assets.	Hearings Action Point 134
AM20	Para 6.28	92	Amend second sentence of paragraph 6.28 as follows: 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.	Factual update

AM21	Para 6.39	97	Amend second sentence of paragraph 6.39 as follows:	Factual update
			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.	
AM22	Para 6.46	98	Amend second sentence of paragraph 6.46 as follows:	Factual update
			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))	

Economic Prosperity

AM23	Para	112	Amend paragraph 7.22 as follows:	Factual
	7.22			correction to
			Chelveston Employment and Energy Innovation Park, to deliver zero-carbon solutions for	address
			industry, integrating high energy consumer businesses with large scale direct-supply	comments
			renewable energy (estimated around 800 jobs);	from
				Chelveston
				cum Caldecott
				Parish Council
				(Rep 2/01)
AM24	Para	115	Amend third bullet point as follows:	Typographical
	7.32			correction
			The Enterprise Centre (Michael Way, Raunds) and other associated public lead	
AM25	Para 7.48	120	Amend NPPF reference in the first sentence as follows:	Factual update
			(NPPF Paragraph 80 <u>81</u>)	
AM26	Para 7.52	121	Amend NPPF reference in the first sentence and final sentence as follows:	Factual update
			(NPPF paragraph 8586(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 .	

AM27	Para 7.57	124	Amend NPPF reference in the first sentence as follows:	Factual update
			The NPPF required the preparation of an impact assessment for retail, office and leisure uses beyond the town centres (paragraph 89 0)	
AM28	Para 7.63	127	Amend NPPF reference in the final sentence as follows:	Factual update
			paragraph 923 of the NPPF	
AM29	Para 7.64	127	Amend NPPF reference in the first sentence as follows:	Factual update
			(NPPF paragraph 86 <u>7</u>)	
AM30	Para 7.72	128	Amend NPPF reference in the first sentence as follows:	Factual update
			(paragraph 88 <u>9</u>)	

Housing Delivery

AM31	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:	Factual update Taylor
			Commitment on basis of JCS Annexe A.	Wimpey/BDW (Rep 57/15)
AM32	Table 16	134	Table 16 after para 8.8 – 4 th vertical column – 6 th column – heading Commitments is missing from heading	Typographical correction
AM33	Para 8.17	136	The word "strategic" in para 8.17 could be replaced by the word <u>indicative</u>	For greater clarity
AM34	Policy EN24	138	Delete the word "and" between points ii) and iii) of Policy EN24	Typographical correction
AM35	Para 8.26	139	Third sentence of para 8.26 delete the word "west" and replace with east before the words Warren Bridge.	Typographical correction
AM36	Para 8.37	145	Amend reference to NPPF paragraph as follows:	Factual Update
			Paragraph 67 <u>8</u>	

AM37	Policy EN28	149	Amend Policy EN28 para 2: Delete "prcess" and reword as process	Typographical correction
AM38	Para 9.7	166	Amend para 9.7 first sentence as follows: The extent of the gross development area site allocation to be shown on the Policies Map, is defined by Policy EN33 below and depicted in Figure 18.	For clarity Taylor Wimpey/BDW (Rep 57/)
AM39	Para 9.9	169	Amend spelling of obligations in the second sentence and the last sentence of paragraph 9.9 as follows: Oblighations	To update with 2020 monitoring information.
			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.	

Town Strategies

AM40	Title	172	Change title from Town Strategies to 'Town Centre Strategies' 10.0 Town Centre Strategies	Hearings Action Point 121
AM41	Para 10.4	172	Amend para 10.4 penultimate sentence as follows: There is no Neighbourhood Plan in preparation for Thrapston, or Oundle.	Factual update
AM42	Para 10.21	180	Include reference to the flooding issue in the supporting text: 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	Hearings Action Point 116

			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 development (subject to appropriate flood mitigation measures), the site would be suitable for town centre uses, leisure or commercial uses.	
AM43	Para 10.24	181	Para 10.24 – Heading – reads "Westbrook" should be <u>Washbrook</u>	Typographical correction
AM44	Para 10.38	186	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 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.	Factual correction to address comments from Chelveston cum Caldecott Parish Council (Rep 2/02)
AM45	Para 10.49	193	Para 10.49 – Error in numbering (should be 6 points) – No. 4: <u>Way</u> should be part of bullet point 3	Typographical correction

Appendix 3

3		Amend to reflect the proportion of the site that lies within the East Northamptonshire area only.	Factual correction
am	terpris trea		

EN19	
(07)	

Appendix 4

AM47	Appendix 4	1 st and 5 th	Amend front page of Appendix 4 as follows:	Hearings Action Point
		page of append	Town Centres <u>boundaries</u> and Primary Shopping Areas <u>Frontages</u> ¹ : Irthlingborough	108
		ix 4	Oundle	
			Thrapston	
			Local Centres: Raunds and Stanwick Rushden Brigstock Ringstead Stanwick Woodford	
			Amend Raunds and Stanwick Local Centres Map Legend as follows:	
			Raunds Secondary Shopping Area (Relates to Raunds Neighbourhood Plan Policy)	

¹ The Town Centres <u>boundaries</u> and <u>or</u> Primary Shopping Areas <u>and, where designated, Primary Shopping Frontages</u> for Higham Ferrers, Raunds and Rushden are designated in each of the Neighbourhood Plans for these towns



PLANNING POLICY EXECUTIVE ADVISORY PANEL Wednesday 14th December 2022

Report Title	North Northamptonshire Strategic Plan Scope and Issues Consultation
Report Author	Simon James – Policy Manager (Strategic Policy, Design and Delivery) simon.james@northnorthants.gov.uk
Relevant Executive Member	Councillor David Brackenbury – Executive Member for Growth and Regeneration

List of Appendices

Appendix A – Summary of Scope and Issues consultation responses and officer responses

Appendix B – Summary of feedback from Workshops

Appendix C – Summary of Sustainability Appraisal Scoping Report consultation responses and officer responses

1. Purpose of Report

1.1. To inform Members of the responses to the Strategic Plan Scope and Issues consultation and seek feedback on the officer responses. This report also considers the next steps in progressing the Strategic Plan and identifies issues relevant to this.

2. Executive Summary

- 2.1. The North Northamptonshire Strategic Plan will be a key statutory document for North Northamptonshire Council (NNC). It will cover the whole Council area. The Plan will review and, where appropriate, replace the policies that address the strategic planning priorities for the area that are set out in the North Northamptonshire Joint Core Strategy. The Strategic Plan will be supported by a combination of area-based or topic-based plans, which could include reviews and updates of the Part 2 Local Plans.
- 2.2. Members of this Executive Advisory Panel (EAP) considered and provided feedback on the draft Scope and Issues consultation document and the approach to consultation at its 21st February 2022 meeting. Consultation on the Scope and Issues, which represented the formal commencement of the Strategic Plan, was undertaken for 8 weeks between 28th March and 23rd May.

The Sustainability Appraisal Scoping Report was also consulted on at the same time. A verbal update on the headlines of the consultation was reported to the 28th June 2022 meeting of this EAP.

- 2.3. An update on the Strategic Plan was provided as part of a report on the Planning Policy work programme which was reported to the 26th September meeting of this EAP.
- 2.4. This report provides an overview of the responses received to the Scope and Issues consultation, together with proposed officer responses, which is provided at Appendix A. Members are asked to note the responses to the consultation and provide feedback on the officer responses and note the further work officers will undertake to progress the Strategic Plan and develop spatial options.

3. Recommendation

- 3.1. That Members of the Planning Policy Executive Advisory Panel:
 - a) Note the responses to the Scope and Issues consultation as summarised in Appendix A;
 - b) Provide feedback on the officer responses to consultation feedback set out in Appendix A; and
 - c) Note the further work officers will need to undertake to progress the Strategic Plan and develop spatial options, including:
 - Progressing and commissioning technical work to support the Strategic Plan.
 - Reviewing the responses received to the Call for Sites, which will include assessing each individual submission.
 - Progressing key policy issues as discussed in this report and Appendix A and developing and testing spatial options and arranging Member workshops to input into this.

Reason for recommendations:

3.2. To receive Member input in considering the responses to the Scope and Issues consultation and proposed officer response. Responses received, along with Member discussion and feedback will inform the development of the Strategic Plan alongside ongoing technical work.

4. Report Background

- 4.1. The North Northamptonshire Strategic Plan will be a key statutory document for the Council. It will form the strategic Part 1 Local Plan for North Northamptonshire, to be supported by a combination of area-based or topic-based plans, which could include reviews and updates of the Part 2 Local Plans.
- 4.2. Consultation on the Scope and Issues for the Strategic Plan ran for 8 weeks from 28th March to the 23rd of May 2022. The Sustainability Appraisal (SA)

Scoping Report was subject to consultation at the same time as the Scope and Issues. A verbal update on the headlines of the consultation was reported to the 28th June meeting of this EAP. An update on the Strategic Plan was provided as part of a report on the Planning Policy work programme which was reported to its 26th September meeting.

- 4.3. Consultation included a variety of methods, consistent with the approach set out in the Statement of Community Involvement (and which was more extensive in scope than required by regulations). This included:
 - Town and parish council virtual workshops
 - Drop-in sessions at main Council offices (Thrapston, Corby, Kettering and Wellingborough) with summary leaflets being available
 - Member workshop
 - The consultation being hosted on the Citizen Hub of the Council's website and being signposted to on the legacy authorities' websites
 - Hard copies of consultation material being made available at main Council offices and libraries, and summary leaflets being sent to all libraries
 - Notifying people on the Strategic Plan database, North Northamptonshire Consultation Register and Residents Panel
 - Press release and use of Council social media channels
 - Information being shared by North Northants Business Network
- 4.4. The Scope and Issues consultation document included 38 questions to guide feedback. 378¹ respondents, including individuals and organisations, provided feedback to the consultation, comprising over 3,500 individual responses to questions. This was a higher response rate than previous consultations on the North Northamptonshire Joint Core Strategy. 289 respondents submitted responses via the online questionnaire on the Council's website, with the remainder submitted via email. Several of the email submissions from developers included extensive background documents. These responses have been summarised where necessary and incorporated into a spreadsheet, alongside responses submitted online². All submitted material will be considered in the development of the Strategic Plan. Officers are discussing the best way of publishing the spreadsheet of responses to meet the Council's website accessibility requirements.
- 4.5. There were 49 respondents to the SA Scoping Report and a separate response summary has been prepared, which is provided at Appendix C. A spreadsheet of responses has also been prepared.
- 4.6. As part of developing a new Housing and Employment Land Availability Assessment (HELAA) to inform the Strategic Plan, a Call for Sites consultation took place between 12th January and 25th April 2022 (although sites could be submitted until the end of May as part of the Scope and Issues consultation). This allowed interested parties to submit potential sites for consideration

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¹ Some organisations submitted multiple responses to the consultation separately, principally developers supporting the promotion of different sites. These are treated as separate respondents for the purpose of the question specific analysis in Appendix A and the response spreadsheet.

² Responses have been redacted where necessary but not formatted, spell checked, etc.

through the Strategic Plan and other relevant workstreams (such as registers of brownfield sites). Alongside this, consultation also took place on a proposed approach to site assessment and methodology for undertaking the HELAA. This consultation received a significant response with around 323 site submissions received alongside comments on the other elements of the consultation. A significant number of 'Call for Sites' submissions were also promoted through responses to the Scope and Issues consultation.

4.7. An interactive map of sites received through the Call for Sites, including additional sites submitted through the Scope and Issues is currently being prepared.

5. Issues and Choices

Key issues from consultation

- 5.1. There was significant feedback to the Scope and Issues consultation, which has provided a lot of issues to consider, and valuable evidence to inform the Strategic Plan and future policy development including policy amendments, sites to consider and suggestions for further technical work. Summaries of feedback to each question along with an officer response is provided at Appendix A. It should be noted that these are summaries of key issues raised and do not reference each individual response to questions, (which are instead set out in the spreadsheet of responses). In some instances, responses from specific organisations are summarised or quoted to provide further detail on the issues that have been raised. Similarly, the officer response seeks to provide a direction of travel as to how officers will seek to progress these issues and doesn't respond to each individual response. Feedback from Members on the officer responses will help to shape the development of the next stages of the Strategic Plan.
- 5.2. There are several key issues arising from consultation responses, many of which will need to be considered as the Strategic Plan is developed. Whilst not highlighted below, responding to climate change will be at the heart of the plan, and infrastructure planning and provision will also be critical. Several of these issues, listed below are likely to form the focus of responses at future consultation stages and be explored in detail at the examination into the soundness of the plan. These are discussed in more detail in Appendix A and include:
 - Oxford-Cambridge Arc: Developers recognised uncertainty with the Arc Spatial Framework but considered that the Strategic Plan should still capitalise on the opportunities of the Arc.
 - Plan-period: A number of developers are seeking the plan-period to be extended beyond 2041.
 - **Spatial Strategy**: There was recognition of the benefits of an urban-focused strategy. Some Garden Community promoters are seeking extensions to these, and other strategic sites have been promoted at the Growth Towns. However, several respondents seek a more flexible spatial strategy to meet future needs with more growth at Market Towns and in Rural Areas/a more

- dispersed spatial strategy and promoted sites in support of this. The overreliance on delivery from Garden Communities was highlighted and robustly challenged by several respondents through reference to under-delivery to date, and challenging future delivery assumptions.
- Local Housing Need: A significant number of developers considered the Strategic Plan should set out a provision above Local Housing Need.
- Logistics: The approach to logistics will be a contentious issue for the Strategic Plan. Several strategic sites have been promoted through the Scope and Issues/Call for Sites consultations and there is strong developer pressure citing incredibly strong demand/need and a shortage of suitable sites, whilst also highlighting opportunities provided by the sector. Several other respondents, including members of the public, some parish councils, CPRE and some Members have the opposite view and expressed concerns about the impact of logistics and concern about its future role.
- Town Centres and role of Rushden Lakes: Several respondents made suggestions on how the Strategic Plan could support town centres. The Crown Estate suggested that the role and function of Rushden Lakes is maintained and improved with recognition as part of the wider town centre network and specific policy framework to support diversification.
- Standards: A number of developers considered the Strategic Plan shouldn't introduce new standards beyond Building Regulations/10% Biodiversity Net Gain
- **Kettering North**: A large number of respondents said that Kettering North should be de-allocated, and the present use of this site should be retained and/or used as a country park.
- **Special Protection Area**: Natural England set out that any growth needs to consider the Upper Nene Valley Gravel Pits Special Protection Area (SPA) and the Mitigation Strategy (i.e. growth above that planned for within the strategy may require it to be updated and revised so it continues to protect the site from increased recreational pressures and loss of Functionally Linked Land).
- **Place-making principles**: Broad support for the Place-making principles in the consultation document although some refinements were suggested.
- **Duty to Cooperate**: Positive responses from adjoining authorities.
- 5.3. Respondents were generally supportive of the SA Scoping Report, including the issues it covers and the proposed SA Framework and SA objectives. However, feedback suggests there is potentially some scope to broaden certain areas of the report to provide more clarity and detail on some employment, environmental and design issues both in terms of the baseline data presented and how this can be reflected in SA Framework.
- 5.4. A summary of feedback from the town and parish council workshop and Member workshop is provided at Appendix B. These workshops provided valuable feedback to inform the Strategic Plan and other work, as well as shaping the approach to future consultation and engagement. They raised several issues that featured in the consultation responses discussed in Appendix A. The potential approach to future consultation and engagement is discussed later in this report.

National and Sub-Regional context

- 5.5. Alongside consideration of the issues raised in responses, it will also be necessary to consider the implications of planning reform and measures set out in the Levelling Up and Regeneration Bill as well as the Sub-Regional context.
- 5.6. There has been little progress in relation to proposals for planning reform since the publication of the Levelling Up and Regeneration Bill in May 2022, which is currently at reporting stage in the House of Commons. Further measures in the Bill were announced by government on 6th December through a Written Ministerial Statement³ although the exact detail is unclear at this stage. Given this lack of clarity, it is important to maintain momentum in progressing the Strategic Plan and respond to any announcements accordingly.
- 5.7. The Oxford-Cambridge Arc provides the sub-regional context for developing the Strategic Plan. The Scope and Issues document set out that the Strategic Plan will respond to the challenges and opportunities presented by the Arc. It sought feedback on how North Northamptonshire should respond but recognised the significant uncertainty with the proposals for an Arc Spatial Framework. Government's response to the Spatial Framework Vision consultation has still not been published. Whilst there have been no formal announcements, it is now widely understood that government no longer intends to produce a 'top down' Arc spatial framework, although arrangements are proposed to maintain partnership working at Arc level. The Arc is discussed further in the officer responses to relevant questions in Appendix A. Within this context, it should be noted that officers consider that the 2021-2041 planperiod remains appropriate.

Technical work and development of spatial options

- 5.8. A significant amount of technical work to support the development of the Strategic Plan continues to progress. This work includes the Housing & Economic Needs Assessment (due to report shortly) Special Protection Area (Visitor Access Study and Bird Disturbance Study), Retail Capacity and strategy. Climate change and Net Zero evidence has also been commissioned and has commenced. Officers have also been involved in Sub-Regional studies, including England's Economic Heartland Northampton-Oxford Connectivity Study and the South East Midlands Local Enterprise Partnership (SEMLEP) Logistics Study⁴, which has been published on the SEMLEP website. As discussed in several officer responses this evidence will be fundamental to responding to key issues and developing the Strategic Plan.
- 5.9. Further technical work will be needed to support the Strategic Plan, including development and testing of spatial options. The scope of further technical work that may need to be commissioned will be informed by consultation responses

³Update on the Levelling Up Bill: https://questions-statements.parliament.uk/written-statements/detail/2022-12-06/hcws415

⁴ Warehousing and Logistics in the South East Midlands: https://www.semlep.com/warehousing-and-logistics/

- and will need to consider work being commissioned by other areas of the Council and other organisations to ensure efficient use of resources and that there is no duplication.
- 5.10. Whilst the Strategic Plan will focus on strategic sites (discussed in question 28 of the Scope and Issues consultation), an interactive map of sites received to the Call for Sites is currently being prepared. Officers are also currently reviewing the wider responses received as part of developing the HELAA, including on Methodology and Assessment Criteria. No decisions have yet been made about the suitability of sites.
- 5.11. Key elements which will influence the spatial options of the plan are set out in detail at para 10.14 of Appendix A. These will include several factors including the scale of growth being planned, the need to demonstrate a robust delivery trajectory and climate change impacts. The next steps will be to identify realistic spatial options and test them against a number of objectives to ensure that the spatial strategy meets the plan's vision and spatial outcomes together with the priorities identified in the corporate plan.

Future approach to consultation and Member engagement

- 5.12. Officers felt the workshops and drop-in sessions were well received and provided valuable input to inform the development of the Strategic Plan and other work. Officers are considering future consultation arrangements, which will be reported back to Members in due course, but it may be that a similar blended approach is used as the Strategic Plan progresses.
- 5.13. In respect of wider Member engagement, it is recognised that this will be essential in progressing the Strategic Plan. It is anticipated that all Members will be invited to workshops during the preparation of the Strategic Plan. Outcomes from these will be reported back to Members of this EAP as the plan is progressed, providing the governance for the Strategic Plan.

Timetable for Strategic Plan

- 5.14. The report to this EAP on the Scope of the Strategic Plan⁵ on 9th December 2021 set out at para 5.5 that it will be important to keep the proposed timetable for the Strategic Plan under review. It noted that changes which may impact on the timetable such as the availability of resources, the progress of the Arc Spatial Framework and associated evidence base; and the timetable and extent of any national planning reforms will continue to be monitored. It also set out that the first anticipated review of the timetable will be following the analysis of feedback from the consultation on the scope of the plan and any key issues arising from the initial evidence base.
- 5.15. Due to the number of responses received and resource pressures, the analysis of consultation responses has taken longer than anticipated. It is important that

⁵ Planning Policy EAP 9th December 2021 Report on the Scope of the North Northamptonshire Strategic Plan (Report Item 6)

- momentum on the preparation of the plan is maintained, but it is also important that thorough consideration is given to the responses received.
- 5.16. The development of the Strategic Plan will require further resource, likely to be identified through the restructure of the planning service. This should help in maintaining timely progress with the Strategic Plan's preparation. It may be necessary to strengthen interim arrangements before the restructure is finalised, the Interim Planning Policy Lead Manager is reviewing options.
- 5.17. As reported to the 26th September EAP, the Local Development Scheme (LDS), which provides the project milestones for the Development Plan Documents, was last reported to this EAP at its meeting held on 9th December 2021, and subsequently adopted at full Council on 31st March 2022. It indicated that following the early stakeholder engagement, an options consultation was anticipated to be undertaken in November 2022. Given the significant response to the initial consultation exercise and resource pressures, this timescale will be reviewed through an update to the Local Development Scheme (LDS). Further clarity on resources available will inform revisions to the LDS. These revisions will be reported to this EAP in due course.

6. Next Steps

- 6.1. The level of feedback to the Scope and Issues consultation is welcomed and has provided an important opportunity for our communities, statutory agencies, and other stakeholders to inform the development of the Strategic Plan at an early stage in the process. Responses will inform and contribute to the development of detailed planning policies and proposals at later stages of the plan making process.
- 6.2. The next stage in the preparation of the Strategic Plan will be to develop a range of potential spatial options to meet the level of growth being planned for across North Northamptonshire. As previously discussed, officers are continuing to develop these alongside commissioning and progressing technical work to inform this work.
- 6.3. It will be necessary to revise the timetable for the Strategic Plan, taking account of the issues raised in this report, which will be done through an update to the LDS when further clarity on resources is available.

7. Implications (including financial implications)

7.1. Resources, Financial and Transformation

7.1.1. The costs associated with progressing the Strategic Plan will be met through existing budgets. Sufficient resources will be needed to progress the Strategic Plan in a timely manner. The Planning Policy team is currently carrying a number of vacancies, which is challenging when seeking to meet agreed timescales. However, exploring innovative ways of delivering the service will continue, including seeking to make efficiencies, develop income and savings. Restructure of the service and recruitment to fill vacant posts will in time help

to ensure progress continues to be made in a timely manner. As above, it may be necessary to strengthen interim arrangements pending this being finalised. Resources and support from other services within the Council such as Highways, Flood & Water Management, ecology, etc will also bring benefit to support the development of the plan.

7.1.2. The evidence base required to support the drafting of the plan will require a number of studies, many of which will require external consultancy input and specialist legal advice. Should costs for studies be higher than anticipated, there be insufficient specialist support in house, or a requirement for unforeseen technical work, this may place pressure on the budget. This will however be monitored closely. It will be important to work collaboratively with other service areas across the Council when technical work is being commissioned to ensure resources are used as efficiently as possible. The plan itself will also require the Council to enter into a contract with the Planning Inspectorate to examine the plan. Whilst it is difficult to anticipate the full costs of producing a plan, a work programme will continue to be developed, which will also forecast charges, particularly in the lead-up to the Examination.

7.2. Legal and Governance

- 7.2.1. The Strategic Plan will review and, where appropriate, replace the policies that address the strategic planning priorities for the area that are set out in the North Northamptonshire Joint Core Strategy. When formally adopted, the Strategic Plan will form part of the Development Plan for North Northamptonshire to guide development alongside Part 2 Local Plans and Neighbourhood Plans and any other development plan documents which the Council may feel it necessary to produce.
- 7.2.2. The preparation of the Strategic Plan will need to comply with legal and regulation requirements set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012.

7.3. Relevant Policies and Plans

7.3.1. The Strategic Plan will take forward the key commitments for the Council set out in the Corporate Plan and provide the spatial dimension to it. The Scope and Issues consultation extensively cross-referenced the relevant sections of the Corporate Plan to demonstrate how this will be taken forward.

7.4. **Risk**

- 7.4.1. There are no significant risks arising from the proposed recommendations in this report. The main risks in preparing the Strategic Plan are:
 - Not Maintaining progress in meeting key stages to enable the plan to proceed as efficiently as possible to Examination and adoption.
 - Not securing the necessary resources to allow the preparation process to proceed in line with the LDS, causing delay. In respect of staffing resource,

- the policy team now carries a number of vacant posts which is currently impacting on delivery timescales set out in the LDS and the capacity to provide comprehensive data monitoring to support policy development.
- Significant changes to national policy and sub-regional guidance.
- The cost of technical studies being higher than forecast and the need to commission unforeseen technical work.
- The Strategic Plan not satisfying the tests of soundness, namely that the plan has been positively prepared is justified, effective and is consistent with national policy.

7.5. **Consultation**

7.5.1. Consultation on key stages of the Strategic Plan will be undertaken in accordance with statutory requirements, including the Statement of Community Involvement.

7.6. Consideration by Scrutiny

7.6.1. There is no identified need for wider consideration by Scrutiny although should members of the Scrutiny Commission request it to go into the work programme, they can do so.

7.7. Equality Implications

7.7.1 There are no Equality Implications arising from the recommendations in this report. An Equalities Impact Assessment screening was completed in consultation with the Council's Equalities team when the Scope and Issues Consultation was prepared, and this will continue to be reviewed as the plan progresses. This will be informed by issues raised in consultation responses.

7.8. Climate Impact

7.8.1. The Council, having declared a climate and environment emergency in June 2021, is committed to reducing its climate impact both within its own Council buildings and in working with businesses and the wider community to achieve net zero energy efficiency. The approach to climate change will be fundamental to the development of the Strategic Plan. This was set out within the Scope and Issues consultation document and is discussed within this report at Appendix A.

7.9. **Community Impact**

7.9.1. The development of the Strategic Plan, including consultation on Scope and Issues, seeks to ensure that existing and new communities in North Northamptonshire see real benefits from development. Consultation on the Strategic Plan as it progresses, and the evidence base to inform it, will help inform the approach and how benefits can be maximised.

7.10. Crime and Disorder Impact

7.10.1. The Strategic Plan will set out policies to ensure safe communities and development. The Scope and Issues consultation document provides further guidance on this, including within the key Principles for Place-making and Sustainable Communities. Consultation feedback, discussed within this report, will inform the approach to these elements as the plan is developed and it is noted that Northamptonshire Police responded to the consultation.

8. Background Papers

- 8.1. North Northamptonshire Local Development Scheme
- 8.2. North Northamptonshire Strategic Plan Scope and Issues consultation web page
- 8.3. Planning Policy EAP 26th September 2022 <u>Report on Planning Policy Work</u> Programme Update (Item 5)
- 8.4. Minutes of Planning Policy EAP 28th June 2022
- 8.5. Minutes of Planning Policy EAP 21st February 2022
- 8.6. Planning Policy EAP 21st February 2022 Report on North Northamptonshire Strategic Plan Scope and Issues (Item 5)
- 8.7. Planning Policy EAP 9th December 2021 Report on Scope of the North Northamptonshire Strategic Plan (Item 6)
- 8.8. North Northamptonshire Joint Core Strategy 2011-2031, adopted July 2016



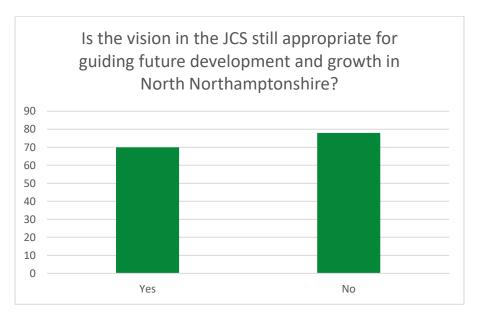
PPEAP 14th December 2022 Item 5 Appendix A

North Northamptonshire Strategic Plan Scope and Issues

Summary of Scope and Issues consultation responses and officer responses

Spatial Vision

Question 1. Is the vision in the JCS still appropriate for guiding future development and growth in North Northamptonshire. Are there any changes you would like to see to the vision and why?



- 70 respondents said 'yes'
- 78 respondents said 'no'
- 1.1 Respondents who answered 'yes' and thought that the North Northamptonshire Joint Core Strategy (JCS) vision was still appropriate for guiding future development and growth suggested a number of varied and wide-ranging changes. Many of the comments related to the overall spatial strategy and whilst there was significant support for the existing urban focus there was also a strong recognition of the need to look at the role of settlements beyond the growth towns. Many of the comments focused on the need to ensure rural areas had a greater choice of homes and jobs provided. Some respondents referenced that the Covid-19 pandemic has highlighted the need to ensure settlements are more self-reliant. It was suggested that greater levels of housing being directed to the Market Towns and larger sustainable villages would assist in the government's 'Levelling Up' agenda by

- helping to address disparities in the quality of life experienced across urban and rural communities.
- 1.2 There were a number of comments relating to the need to have a more joined up approach to improve transport links and to enable more sustainable transport links in the rural area including making cycling more attractive. Whilst it was noted that North Northamptonshire has excellent strategic transport connectivity, it was suggested that the vision should refer to the need for improvements in capacity.
- 1.3 A number of comments related to the logistics sector. The development industry in particular identified that it is important that the Vision recognises the significant growth and demand for logistics floorspace within North Northamptonshire in order to ensure that the plan meets the regional and national demand for strategic distribution development. They suggested it should also recognise the contribution this sector can make to delivering a 'low carbon' economy. It was also suggested that the vision should recognise the symbiotic nature of housing and employment development and that these needs are fully aligned. As part of this balance, responses set out that North Northamptonshire needs to accommodate growth in the logistics sector to ensure that the needs of people who live there are met. In simple terms, more homes create a need for more logistics fulfilment, especially with the rate of growth in ecommerce which has been exacerbated by the Covid-19 pandemic.
- 1.4 A common theme in responses was the need for greater emphasis on the environment. This included directing development to areas of least biodiversity importance and increased reference to tree planting. It was suggested by the Environment Agency (EA) that the plan should be more ambitious and innovative and set world leading sustainability targets to adopt a natural capital approach to growth and infrastructure provision and to recognise the challenges faced by a changing climate, and how these may develop over the coming years. Linked to this they also suggested that the Plan should ensure that the environment and communities are protected, prepared and able to adapt to the impacts of change. Further still, the EA recommended that the Plan should ensure growth is delivered in a way that increases health, wellbeing and contentment of people and nature by recognising the wide range of services and wellbeing benefits of increased access to nature and for this to be evidenced based, sustainable and measurable to ensure that actions and outcomes place no additional pressures on North Northamptonshire's already constrained resources, such as potable water supply.
- 1.5 There were suggestions that there should be more emphasis on protection of the countryside for its own sake, rather than for access and enjoyment and recognition of the countryside as a working resource for food production and a meaningful separation between communities. Several respondents including Natural England referred to the need to reference the government's ambitions

- in the 25 Year Environment Plan and the Oxford-Cambridge Environmental Principles. It was also suggested by the Wildlife Trust that the Local Nature Recovery Strategy (LNRS) should be included as one of the mechanisms to further protect and enhance local biodiversity.
- 1.6 It was suggested that there should be increased emphasis on the regeneration of town centres including in the market towns. The Crown Estate thought that the vision should support the continued success of Rushden Lakes for retail, leisure and employment and as an exemplar of how to integrate development with the natural environment.
- 1.7 Several respondents thought that there was not enough focus on the regeneration of town centres including those within the market towns. It was suggested that the plan needs to recognise the reality of Rushden Lakes and the impact this has had on the town centres of Kettering, Corby and Wellingborough. One respondent thought that retaining reference to Rushden Lakes would be contrary to the Corporate Plan's aim of helping town centres and villages respond to changing trends and the promotion of sustainable travel. They considered that Rushden Lakes does not result in environmental benefits, it has resulted in considerable increases in traffic and congestion, which increases pollution from exhaust emissions contributing to the greenhouse effect.
- 1.8 Historic England commented that heritage should be clearly referenced within the Vision to reflect the strategic policy requirement as set out within the National Planning Policy Framework, paragraphs 20 and 190. They are particularly keen to see continuation of the key objective of the JCS to maintain distinctive and separate settlements by preventing coalescence. "This is an important objective in order to maintain the distinct historic character of settlements and their settings".
- 1.9 Of the respondents who did not support the vision the comments made were very similar to those who supported the vision. The main themes were a need for greater protection of the natural environment and the need to have a more diverse spatial strategy.
- 1.10 The greatest number of comments from residents were in relation to the apparent over-reliance on warehousing and the perceived effect of this on the number and quality of jobs and the impact on highways and the environment. The suggestion was that the emphasis should be on should be on attracting high-tech industries, preferably those involving green technologies.
- 1.11 There was also significant support, mainly from the development industry for a spatial strategy with increased emphasis on the market towns and larger sustainable villages. It was suggested by a number of respondents, notably from the development industry, that to allow for a more responsive and diverse housing market, this can only occur by encouraging small to medium housebuilders to deliver local needs and ensure more choices are made available. The significance of meeting local housing needs was also

highlighted as being central to the future success and prosperity of North Northamptonshire. Lack of affordable housing was identified as a clear social issue that the new Strategic Plan needs to address. Lack of homes in general was also considered by some respondents to be a clear constraint to economic growth and potential barrier to investment which also needs to be addressed.

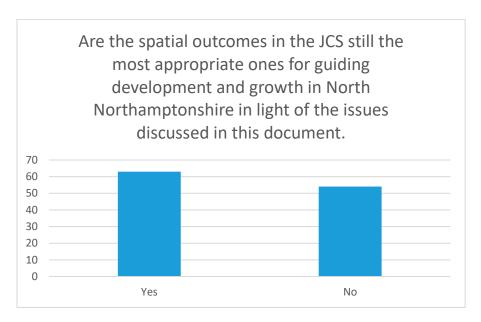
- 1.12 A number of respondents commented on the need to address the climate emergency that has been declared and that the strategy must be focused on developing in a zero-carbon way. One responded suggested that a stronger emphasis is needed to address CO₂ from transport. They suggested that the council needs more bravery and to acknowledge that drastic behaviour change is required and that the council is key to enabling that. Other comments related to the need to increase environmental building standards and develop sustainable clean energy sources in North Northamptonshire.
- 1.13 Other environmental comments related to the need to protect the natural environment and green spaces. It was suggested that more areas should be designated for wildlife with appropriate protection areas for light and noise pollution around them. Respondents also commented that there was insufficient focus given to identifying sites locally for biodiversity net gain credits.

Officer response

1.14 The comments received will be helpful in reviewing the vision for the plan. The vision will need to reflect the approach taken in the plan regarding the spatial strategy, economic delivery and the environment. A balance will need to be struck between including a vision that is appropriately aspirational, but also achievable. Several respondents commented that recent development within North Northamptonshire does not reflect the current vision. It is therefore also important to ensure that the vision and policies are appropriately implemented. It will not be possible to include all of the elements respondents raised as part of the vision as it would end up being too detailed, but the points raised can be reflected in the more detailed policies of the plan and other documents where appropriate.

Spatial Outcomes

Question 2. Are the spatial outcomes in the JCS still the most appropriate ones for guiding development and growth in North Northamptonshire in light of the issues discussed in this document. What changes to, or other outcomes would you like to see?



- 63 respondents said 'yes'
- 54 respondents said 'no'
- 2.1 Respondents recognised that spatial outcomes must reflect the overall vision and several responses are linked to site promotion/interests including changes to the spatial strategy.
- 2.2 Several respondents who answered 'yes' that the spatial outcomes in the Joint Core Strategy (JCS) are still the most appropriate suggested refinements to them. Respondents highlighted elements of the objectives that should be updated to reflect current legislation and guidance, notably the Environment Agency who suggested amendments to several objectives, including better reflecting the 25 Environment Plan.
- 2.3 Strengthening the protection of green space, referencing infrastructure provision were among highlighted changes. The lack of public transport provision was flagged by Gretton Parish Council who stated that "Whilst the outcomes are correct, it is difficult to understand how these can be achieved if the NNC Bus Strategy does not take into consideration the need for regular, all day bus services to the settlement".
- 2.4 The need to recognise the climate emergency was highlighted in several responses including from the Environment Agency who stated that Objective 2. Adaptability to Future Climate Change should be broadened to better

reflect the aspirations of the 25 Year Environment Plan. "In particular, the statement that the Plan will 'create more sustainable places that are naturally resilient to future clime change' should be broadened to specifically reference land use change, flood risk, water resource, vulnerable infrastructure, and future climate relocation and recognise that the natural environment, people and infrastructure will all need to adapt to climate change and therefore be future-proofed. In addition, the objective should be broadened to better reflect the Arc Environmental Principle 1 'to work to a target of net zero carbon at an Arc level by 2040' by including targets for carbon reduction across North Northamptonshire".

- 2.5 Natural England welcomed the inclusion of Climate change and Carbon reduction in the spatial outcomes. It would like to see an outcome that focuses on protecting natural resources. Particularly water resources (as Northamptonshire is water scarce) and soil resource, namely protection and preservation of Best and Most Versatile Agricultural Land. It would like to see encouragement for developments to include conserving soil and water resources as part of the sustainable development outcomes. It also welcomes the inclusion of Natural Capital projects that support good environmental outcomes.
- 2.6 The link between the spatial outcomes and the spatial strategy was referenced in several responses, and that any refinements to the spatial strategy will need to be reflected in revisions to the spatial outcomes. The Crown Estate considered that Spatial Outcome 9 should be updated to reflect what Rushden Lakes has become as well as supporting its future in the area.
- 2.7 Of the respondents who answered 'no' several changes were suggested to the spatial outcomes along similar themes to respondents who answered 'yes'.
- 2.8 Several residents consider that the JCS outcomes haven't been delivered, and that infrastructure, including public transport has not kept pace with development alongside other negative impacts of growth such as loss of green space, over development of market towns, etc. This was often linked to concerns over future development, including the need to reduce future housing provision and concerns over the amount of warehouse development. More protection of green space featured in several responses, alongside better infrastructure and facilities.
- 2.9 Climate change was raised in several responses, that more importance should be given to the necessary adaptations and mitigations in respect of Climate change and the low carbon future. The Woodland Trust suggested making the outcome wider to include both mitigation of climate change (eg reducing carbon emissions and absorbing carbon from the atmosphere) as well as adaptation. They also suggested the unique role of trees and shrubs in contributing to both of these could be mentioned.
- 2.10 Some developers including Hallam Land Management, Bellway Homes and Miller Homes & Central England Co-Operative commented that a key spatial

outcome that is missing concerns the provision of homes/housing delivery and ability to meet local housing needs, including affordable housing.

Officer response

- 2.11 It is considered that the spatial outcomes remain relevant, but the Strategic Plan will need to consider what changes are needed to these outcomes as the plan is developed. The comments received will be helpful in reviewing the outcomes for the plan. Amendments to these will need to reflect the overall spatial vision for North Northamptonshire, that will be delivered by the strategy and policies within the Strategic Plan. Several respondents commented that recent development within North Northamptonshire does not reflect the current vision and outcomes. It is therefore important to ensure that the vision, outcomes and policies are appropriately implemented.
- 2.12 The Strategic Plan will need to be based on a robust evidence base, and the approach to several issues raised in responses will be influenced by ongoing technical work. It will need to be consistent with legislation and guidance, including the Environment Act and National Planning Policy Framework, alongside anything else that emerges during the preparation of the plan. It is recognised that the approach to elements of the vision and outcomes will need to be strengthened in relation to climate change.

Relationship with the Oxford-Cambridge Arc

Question 3. How should the Strategic Plan respond to the Oxford-Cambridge Arc?

- 3.1 104 respondents answered this question. There was a mixed response, with several respondents, notably from the development industry recognising the Arc as a positive that provided opportunities that the Strategic Plan should plan positively for, with other respondents perceiving the Arc as a threat that should be ignored, particularly given the uncertainty with the Arc Spatial Framework (ASF) and the government moving away from this.
- 3.2 Potential opportunities of the Arc that were raised in responses included:
 - Improvements to infrastructure including East-West and North-South connections to enhance connectivity.
 - Opportunities to deliver high quality jobs.
 - Potential to bring prosperity to the region.
 - There should be a greater emphasis in creating opportunities in Further Education, perhaps through outreach departments of Cambridge or Oxford Universities.

- 3.3 Whilst uncertainty with the ASF was recognised in responses, several developers stated that regardless of the progress of the ASF the Strategic Plan should respond positively to North Northamptonshire's spatial location within the Arc and the economic opportunities that the Arc presents and recognise the aspirations of the Arc by ensuring that sufficient employment and housing land is allocated. There was support for reference in the Scope and Issues consultation document for the Strategic Plan to "respond to relevant opportunities that arise within the Arc" (page 17). The Arc is used as justification in several responses by developers for raising the housing requirement in the Strategic Plan, which they considered is necessary to capitalise on economic opportunities, and that the plan-period should be extended to 2050 to align with the ASF.
- 3.4 Some respondents referenced the Work that has been undertaken on the environment, including the Arc Environmental Principles. The Environment Agency stated that "Net Biodiversity Gain, related to green & blue infrastructure, should be an overarching and cross-cutting element. This should be a key element for good quality housing as this benefits people's health and wellbeing whilst incorporating wildlife corridors". In relation to the ASF they set out that "Should the decision to not progress the Oxford Cambridge Arc Spatial Framework, the collective ambitions held by Local Planning Authorities within the Arc, as indicated in the Arc Environment Principles, will remain relevant. Collaboration on issues and opportunities impacting the wider Arc remains, as do the significant benefits of working together to face future challenges".
- 3.5 Similarly, the Woodland Trust also referenced the "environmental principles" to guide development, including a doubling of nature and a tripling of tree canopy cover and that it would be good if some or all of these could be incorporated into the Strategic Plan.
- 3.6 In contrast to responses seeking to capitalise on the Arc, some respondents set out that with current uncertainty with the ASF, the Strategic Plan should not be too interlinked with the Arc or should ignore it, especially given the government moving away from it and the impact this will have on the delivery of the necessary infrastructure.
- 3.7 CPRE Northamptonshire stated that "There is a danger in the frequent references to the Oxcam Arc in the Scope and Issues paper which gives the impression that this is more important than respecting the local environment and distinctive character of the communities in which we live".
- 3.8 Concerns raised about the Arc included:
 - Impact on infrastructure/infrastructure being inadequate- "the area is already congested and overcrowded".
 - The effect on the environment and local wildlife, including loss of wildlife habitat.

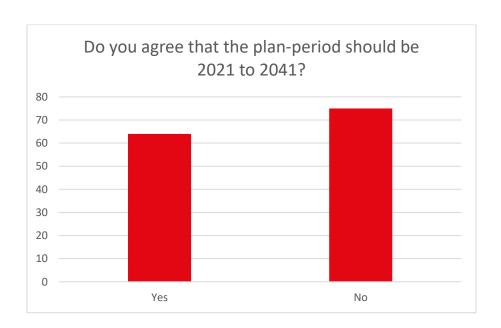
 That the Arc will increase the gap between cities like Oxford, Cambridge and Milton Keynes offering highly paid, skilled employment and North Northamptonshire becoming the logistics and dormitory function of the Arc.

Officer response

- 3.9 Government's response to the ASF Vision consultation has still not been published. Whilst there have been no formal announcements, it is now widely understood that it no longer intends to produce a 'top down' spatial framework. A proposal has been submitted to government about how partners can continue to work collaboratively to progress key projects, notably in relation to the environment and economy.
- 3.10 Whilst the ASF is not being progressed, the economic geography remains and therefore the Strategic Plan will need to consider how it can best capitalise on appropriate opportunities that may exist. Such opportunities have been set out in responses to the Scope and Issues consultation and will inform the development of the plan.
- 3.11 Although the Strategic Plan will therefore not have to respond to the ASF, it will be important to use work already undertaken where appropriate when developing it. As discussed elsewhere, the Arc Environmental Principles have already been endorsed by the council and it will be necessary to consider and test how these may best be taken forward in the Strategic Plan. Ongoing collaboration with Arc partners will support this work.
- 3.12 In the absence of the ASF, local evidence will be critical in relation to the level of housing and employment that the Strategic Plan will need to provide for. The Housing and Economic Needs Assessment will form a key element of this approach. It should be noted that at present, the Duty to Cooperate remains extant. Positive responses from adjoining authorities are recognised and it should be noted that no authority has requested that North Northamptonshire need to help meet its needs.

What period should the plan cover?

Question 4. Do you agree that the plan-period should be 2021 to 2041? If not, what should it be and why?



- 64 respondents said 'yes'
- 75 respondents said 'no'
- 4.1 Respondents who answered 'no' gave a range of suggestions for an alternative plan period and for several different reasons. Some suggested the plan period should be extended whilst others took the opposite view that it should be reduced.

Plan period extended

- 4.2 Responses from the development industry broadly considered that the plan period should be extended beyond 2041. A range of suggested time scales were given in responses, but two principal reasons related to the requirements of the National Planning Policy Framework (NPPF) and the timescale of the Arc Spatial Framework (ASF).
- 4.3 Several developers highlighted the requirements of the NPPF that expects strategic policies to look ahead at least 15 years post adoption and to ensure that large scale growth is set within a vision of at least 30 years. Some responses noted that other authorities within the Oxford-Cambridge Arc such as Milton Keynes Council have responded to this requirement through publication of a Strategy to 2050, supporting plan preparation.
- 4.4 Several respondents, including Stanton Cross Developments and Vistry Group suggested that the plan period should be extended to allow for potential slippage in the preparation of the plan to ensure it meets the NPPF

requirements. Hampton Brook, Buccleuch Property and Redrow Homes suggested that if the preparation and adoption of the Plan were to slip beyond 2026, as identified in the latest Local Development Scheme (LDS), then the plan period to 2041, would not look ahead over the minimum 15-years required by the NPPF. To offer flexibility to reflect potential delays, they considered the plan period be extended to 2045/2046, ensuring a 20-year time horizon post adoption.

- 4.5 Alongside the NPPF requirements, the relationship between the Strategic Plan and the ASF, was highlighted by several developers as justification for extending the plan period. Several respondents suggested the plan period ends to 2050, consistent with the ASF and NPPF guidelines for plans which include larger scale developments and given the planned date for adoption (2025). The Home Builders Federation suggested that the Plan period should run to 2050 if the ASF is developed, but 2041 if not.
- 4.6 Some respondents suggested that the Spatial Vision should be appropriately tested through the Plan making process and the evidence base should be based on a 2050 end-date to align with neighbouring authorities, including the emerging West Northamptonshire Strategic Plan, and to ensure that the Strategic Plan maximises the strategic opportunity presented by the Arc. Planning to 2050 rather than 2041 they suggested would allow for the identification of sufficient sites for both housing and employment to make North Northamptonshire an attractive place to invest in. Rosconn Strategic Land and Henry H Bletsoe and Son LLP suggested that to have an overlapping plan period and spatial vision would only cause unnecessary confusion and instead favoured a single plan period up to 2050.
- 4.7 The Environment Agency suggested a long-term vision to 2050 would align with the 25 year Environment Plan as well as the ASF. Another respondent, along a similar theme, said 2050 would align with the UK's net zero target.

Plan period shortened

- 4.8 Several local residents considered that the plan period should be shortened. Ten respondents said the Plan period should be shortened to run from 2021 to 31 to allow a reassessment after 10 years or include flexibility to react to changes that will impact on the Plan. Some respondents expanded on this by explaining that the rate of technological and societal changes and/or environmental challenges made planning over a longer period unrealistic.
- 4.9 Similarly, some respondents suggested 5 or 10 yearly review cycle e.g., between 2021 to 2026 and 2027 to 2031, noting that circumstances change quickly in a short space of time and to ensure the plan remained relevant and up to date. Another local resident suggested that the plan period be further shortened to 2021 to 2026, adding that the economy and environment were rapidly evolving. Another respondent raised concerns that underfunding had left a crisis in multiple services requiring a shorter plan period necessary to addressing the issues in the short term.

4.10 Gretton Parish Council and a local resident suggested that the plan period should not commence on a year that has passed as this would not be achievable by definition. A further response added that work on the Strategic Plan should stop altogether until a review is carried out on its environmental and global effects and that to have a plan in itself would be inappropriate.

- 4.11 The NPPF expects strategic policies to look ahead at least 15 years post adoption and to ensure that large scale growth is set within a vision of at least 30 years. Responses seeking a shorter plan-period would conflict with the requirements of the NPPF and are considered impractical for a range of reasons, including the time taken to prepare the plan.
- 4.12 It was anticipated that the Strategic Plan would be informed and influenced by the development of the ASF, and it was therefore proposed in the consultation document that the statutory period of the Strategic Plan would run from 2021 to 2041, with the spatial vision extending to 2050 to align with the ASF and to meet the requirements of the NPPF. Although no formal announcement has been made, it is now understood that the Government is no longer planning to prepare the ASF which is a significant change in context, particularly in relation to responses citing this as a reason to extend the plan period to 2050.
- 4.13 It is considered that the statutory plan period from 2021 to 2041 remains appropriate and robust because those aspects of the plan which must be evidence based, such as housing and job numbers, are better suited to this time horizon. A longer plan period would become difficult to predict in respect of the demographics of demand and the delivery implications, which would be likely to require further review.
- 4.14 Whilst the timetable for the Strategic Plan will be revised through an update to the LDS, it is considered there is sufficient scope to fulfil the requirements of the NPPF to have 15 years post adoption. Some respondents referenced the West Northamptonshire Strategic Plan (WNSP) timeframe to justify the plan period extending to 2050. It is important to note that at its meeting on 28th June 2022, West Northamptonshire Council's Planning Policy Committee confirmed that the end date of the plan-period to be covered by the WNSP would be reduced from 2050 to 2041. Therefore, a statutory plan-period to 2041 is consistent with West Northamptonshire which will assist the consideration of cross-boundary issues.
- 4.15 However, even in the absence of an ASF it is recognised that the Strategic Plan is expected to set out a longer-term vision for achieving sustainable growth given the role larger developments such as the Garden Communities will play in delivering the strategy. In addition, it would assist in setting out a credible pathway to outline how North Northamptonshire will achieve net zero by 2050 at the latest.

4.16 A longer-term view on climate change will also be evidenced as part of a holistic, long-term approach. It is proposed that where possible, evidence to inform the Strategic Plan will continue to look to 2050 even in the absence of an ASF.

Climate change

Question 5. What is a realistic and deliverable pathway for reaching net zero for the Strategic Plan?

- 5.1 102 respondents provided feedback to this question. Given the relatively wide scope of this question a number of ideas and responses were received and generally these were thematic in nature.
- 5.2 Overall, responses received to Question 5, were generally mixed with a clear divide of opinions between the development industry and other stakeholders.
- 5.3 The development industry was broadly united in their views that a net zero pathway for the Strategic Plan should follow that of Building Regulations, including the Future Buildings Standard and the improvements in areas such as energy efficiency standards. In line with this, the sector expressed widespread support for the Strategic Plan seeking a 2050 net zero date, with viability cited as a particular reason. In contrast, respondents not working in the development sector generally sought greater ambition on this date.
- 5.4 Alongside the above, a number of actions and priority areas were suggested which could form part of the net zero pathway. Nature based responses to this issue were flagged by a number of respondents with protection of existing trees, and planting of new ones receiving support. Linked to this, natural capital and improving green infrastructure were also raised as key considerations.
- 5.5 As part of a net zero pathway, a number of respondents expressed support for Renewable technologies with wind and solar developments highlighted (particularly the provision of solar on warehouses and other commercial buildings) as well as Heat Pumps and Energy Storage. Feedback was also received that new development should embed new renewable technologies to help them be net zero or net carbon negative.
- 5.6 The location of new development was identified by a number of respondents as a key consideration in the local response to reaching net zero. Within these, the benefits of locating new development in locations already recognised as both sustainable and accessible in the Joint Core Strategy, including urban areas, was highlighted due to these locations having key services, facilities and employment opportunities. Furthermore, these locations were flagged as facilitating better take up of public transport and

- other sustainable forms of travel with a view to reducing the need to travel overall and, therefore, emissions.
- 5.7 In terms of statutory agencies, responses were broadly aligned to the areas these have responsibility for. Historic England highlighted the positive contribution that heritage assets can make to climate change mitigation and adaptation and outlined that the Strategic Plan should reference the need to retain, repair, refurbish, retrofit (where appropriate) and reuse heritage assets and especially historic buildings.
- 5.8 Natural England outlined the view that the Strategic Plan should ensure new development contributes to achieving net zero and contributes to wider national targets with the commitment through the planning system that decisions on development and infrastructure proposals are clearly aligned with this goal.
- 5.9 The Environment Agency emphasised the importance of development not encroaching into flood plains to help resilience to climate change as well as the creation of green infrastructure around blue infrastructure natural features to help deal with flooding and provide a cooling effect for urban areas. They also suggested that for consistency this should be part of/co-ordinated with Oxford-Cambridge Arc plans.
- 5.10 The Forestry Commission wished to see a clear emphasis on how the use of tree planting can be an element of the pathway to deliver net zero in helping to both mitigate and adapt to climate change, with a strategy for trees to sequester carbon and in use of timber for construction as examples to do so. They also supported reducing energy use in terms of fossil fuels and via green routes which enable people to get to locations in the most energy efficient means and which also benefit health and provide a green backdrop to places. Finally, they also flagged that ecology needs link to climate change in the Strategic Plan.
- 5.11 Responses to this question from parish council's flagged support for the Strategic Plan seeking renewable and green technologies through new development.

Question 6. What are the key measures that the plan should take to ensure appropriate climate change adaptation, mitigation and resilience?

- 6.1 104 respondents provided feedback to the question. Given the relatively wide scope of this question a number of ideas and responses were received and generally these were thematic in nature. In broad terms, this highlighted infrastructure, both soft and hard, as means of addressing climate change adaptation, mitigation and resilience in the Strategic Plan.
- 6.2 In line with climatic events experienced in recent years, a number of responses flagged flood risk as a key concern for the Strategic Plan and

highlighted the need to avoid development in or adjacent to flood plains. The Environment Agency suggested that future policies on flood risk should seek that new development includes mitigation measures which would help to reduce flood risk to the wider area/existing properties at risk through measures such as additional flood storage. This was augmented by other respondents who highlighted the use of Sustainable Drainage Systems (such as swales, porous paving and soakaways) in new developments.

- 6.3 Linked to this is the use of natural interventions to address climate change impacts. The protection of existing green spaces was identified as a key measure by a number of respondents, and this was supplemented by support for new nature reserves. In addition, the planting of more trees was flagged, including street trees which were highlighted for their ability to provide both shade and evaporative cooling.
- The distribution of future development was flagged as another key measure in respect of responding to climate change with support given for locating this in the most sustainable and accessible locations with a view to minimising the need to travel. Linked to this, feedback was also received to highlight that communities from North Northamptonshire's large rural hinterlands will continue to rely on cars to travel for some journeys (albeit increased provision of Electric Vehicle (EV) charge points may help offset some of the impacts of this as more EV's are introduced in line with the Governments ambitions in this area).
- Transport was raised as another key measure from respondents. Public Transport was highlighted as a priority consideration from a number of perspectives, including its incorporation at the start of development and improved access to this. Furthermore, use of electric buses was identified as a way to minimise carbon emissions with this augmented by active travel. Linked to this, opportunities to work locally (including from home) was highlighted as a way to reduce commuting and improve air quality in line with overarching net zero objectives.
- 6.6 Increased deployment of renewable and low carbon technologies was also raised by a number of respondents with solar (including on new warehousing) and wind highlighted in particular. Linked to this, feedback from the Ministry of Defence stated that future policies should make it clear to developers that applications for these forms of development would not be supported where they would be detrimental to defence interests.
- 6.7 Some of the comments from the Statutory Agencies mirror and amplify the issues raised by other respondents in the preceding text but this is considered to emphasise the importance of addressing these within the Strategic Plan.
- 6.8 Natural England flagged that the Nature Recovery Network has significant potential for building North Northamptonshire's resilience to climate change through the protection of existing sites and also in seeking opportunities to both invest in and create new habitats that can support adaptation. It also

advised that tree planting for carbon offsetting needs be considered in the context of wider plans for nature recovery and should only be carried out in appropriate locations, taking into account potential impacts on existing ecology/soils and the opportunities to create alternative habitats that could deliver better enhancements for people and wildlife, and store carbon effectively. Furthermore, it is suggested that habitats and protected sites that are at risk from the impacts of climate change are identified, with actions to improve their climate resilience identified in the strategic plan.

6.9 Alongside the issue of flood risk, the Environment Agency highlighted that water resource pressures should be reflected in the strategic plan and are developing an Integrated Water Management Framework to provide a model approach for water planning, help deliver environmental net gain and contribute towards climate change resilience and adaptation.

Officer response to Questions 5 and 6

- 6.10 In terms of feedback to Question 5 It is clear that respondents consider there to be a number of pathways to reaching net zero in the strategic plan and different perspectives about the timeframe and mechanisms for doing so.
- As an organisation, North Northamptonshire Council has declared a commitment to be carbon neutral by 2030. This ambitious target is considered to provide a local context for accelerated action and is of relevance in developing the local plan. It is considered that the viability of bringing forward the national 2050 net zero target in the Strategic Plan should be tested. This will be tested as part of developing the climate change and net zero evidence base, with consultants Ricardo and Land Use Consultants (LUC) recently appointed to undertake this. This wide-ranging commission will cover several work areas including assessing the carbon implications of different spatial strategies, setting out how North Northamptonshire can reach net zero through identified actions and consideration of what a local approach to carbon offsetting could look like, to name a few.
- 6.12 It is recognised that impacts on development of the proposed approach will need to be assessed through a viability assessment and the policy approach will need to be guided on what is suitable and possible through the national guidance available at the time.
- 6.13 With regards to renewable technology, ongoing discussion with National Grid (the local network provider) will take place to understand grid capability alongside an assessment of suitable technology in this area.
- 6.14 In terms of feedback to Question 6, a number of measures were suggested and cumulatively action in these areas would amount to a robust response in ensuring climate change adaptation, mitigation and resilience.
- 6.15 It is noted that many of the respondents mention natural interventions to support climate adaptation and some evidence has already been collected to

set out the most suitable areas for improvements that will have multiple benefits for habitat, flood, air and noise pollution. This can be used as a starting point to assess the most appropriate locations for mitigation. A review of the nature-based solutions will also be undertaken through the Ricardo/LUC study to understand the role that they can play and the multifunctional aspect of these.

- 6.16 The assessment of sites will need to take into account the wider sustainability of the site and also what the site can deliver to mitigate its own climate impact. The evidence base for the Strategic Plan will need to ensure robust and locally specific information is generated to identify the best and combined approach to adaptation, mitigation, and resilience.
- 6.17 It is clear on the basis of feedback received that moving to less carbon intensive forms of transport will be a key issue for the Strategic Plan to facilitate, particularly in the context that transport is the largest source of emissions locally, with various means for further investigation flagged. This will be an area that requires collaborative working across the Council and is particularly relevant given the pressure for road-based logistics as discussed in other questions.

Levelling up

Question 7. How can the Strategic Plan help to level up and ensure no community is left behind?

- 7.1 93 respondents provided an answer to this question. The responses to Question 7 showed a wide range of opinions on the best approach to levelling up and ensuring 'left behind' communities do not fall even further behind.
- 7.2 A high number of respondents emphasised the importance of infrastructure and service provision. Comments highlighted roads and public transport services, pedestrians and cycle provision, education and training facilities, children and young people's services, community centres and other meeting places, healthcare and social services facilities, convenience shopping and other facilities which serve peoples day to day needs, community renewable energy infrastructure, emergency services, tourist facilities, and broadband technology and telecommunications.
- 7.3 Cottingham Parish Council suggested that support should be focused on the most seriously deprived areas. Others suggested that support should be focused across communities with no distinction by geography.
- 7.4 Several respondents, including Cottingham Parish Council, Kettering Constituency Labour Party, and Weldon Parish Council emphasised the importance of informing and listening to the local community, with some

- encouraging local forums and others suggesting the need to improve communications, using focus groups and workshops, both face-to-face and virtual.
- 7.5 Several respondents, including Broughton Parish Council, CPRE, Isham Neighbourhood Plan Steering Group and Isham Parish Council, and others commented on the role of community/neighbourhood planning and suggested local communities are empowered and offered support to find solutions and prioritise investments.
- 7.6 Many respondents suggested safeguarding and enhancing the environment to raise the quality of the area, including tree planting, access to countryside, woodland, and other green spaces or sports provision. Natural England caveated support for increased access to green space with comment that it is important to achieve a balance between increased visitor impacts on highly sensitive areas, particularly the Upper Nene Valley Gravel Pits Special Protection Area. Sport England advised that the plan should be informed by up-to-date evidence and guidance on active design. Northamptonshire FA want to work closely with the Council to update the Local Football Facility Plan that identifies priority projects for investment, highlighting what is needed within each area.
- 7.7 A significant number of comments received in response to Question 7 suggested housing development and improvements to the quality and choice of housing, notably from the development industry. These responses highlighted the need to provide a range of housing types and tenures to meet local needs including integrated affordable and extra care housing, increase the supply of market housing in all locations including smaller towns and rural areas, increase the level of housing provided above the assessment of Local Housing Need to address housing undersupply and affordability, support for high-quality design and home insulation, and flexibility to convert properties to Houses in Multiple Occupation in urban areas. Several developers emphasised the shortage of affordable housing and under delivery of the Garden Communities and that extant allocations in the Joint Core Strategy should be thoroughly reviewed, they also used the answer to this question as an opportunity to promote potential development sites. William Davis Homes referenced their apprenticeship programme and opportunities in skills development and employment.
- 7.8 Many respondents suggested economic growth and creation of good quality job opportunities. Respondents' comments included the encouragement and support for local businesses and the rural economy, prioritising and facilitating the expansion of existing employment sites, attract diverse and higher income jobs, provision of homes with sufficient space for home working, allocation and review of employment sites, and possibly financial incentives for

- businesses. Related to this there were contrasting views on whether more provision should be made for the logistics sector.
- 7.9 Some respondents, including Wellingborough Town Council and Brightwayz, highlighted the importance of connectivity, with particular emphasis on links to schools and between settlements.
- 7.10 Historic England supported a continued focus on historic town centre regeneration as a delivery mechanism for levelling up, whilst Kettering Town Council and others suggested redistribution of developer contributions to more deprived areas. British Veterinary Association Animal Welfare Foundation advocated mixed use developments focused in areas in need of improvement and another respondent suggested the provision of public services should be provided at the start of projects.
- 7.11 Irthlingborough Town Council and CPRE suggested that late amendments to planning approvals, such as house type and size that are dealt with as minor changes, should be discouraged.
- 7.12 Several respondents expressed support for strategic policies within the current Joint Core Strategy encouraging well-designed, energy efficient and affordable housing, supporting regeneration, and improving access to green spaces, healthcare, and social assets and Northants Police, Fire and Rescue and Office of Police, Fire & Crime Commissioner recommended the incorporation of the Secure by Design principles. Sport England advised that the plan should be informed by up-to-date evidence and embed guidance on active design.

Question 8. Are there priority areas for levelling up that the plan should focus on?

- 8.1 86 respondents provided an answer to this question. Many respondents emphasised the importance of infrastructure to support levelling up. Comments highlighted similar infrastructure as answers to Question 7, such as healthcare, education and training facilities, employment, sport and leisure facilities, community centres and other meeting places, broadband technology and telecommunications, children and young people's services, public transport, active travel infrastructure, convenience shopping and other facilities which serve peoples day to day needs, and the natural environment. North Northamptonshire Council's Education Service advised that the Levelling Up and Regeneration Bill includes proposals for the preparation of infrastructure delivery strategies.
- 8.2 Some respondents identified geographic areas that should be prioritised, including rural areas, market towns, town centres, Garden Communities, and some wards or estates in the urban areas. Other respondents suggested

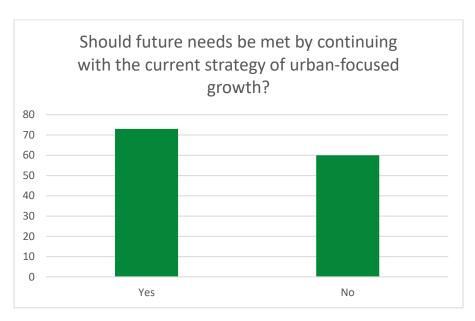
- prioritisation for areas with less engagement in the democratic process, wards with high levels of deprivation. Another respondent argued the focus should be across the entire authority area.
- 8.3 One respondent suggested that disabled, low income and single parent families, and the homeless are priority areas. Another respondent highlighted mental health and that there should be more protected open spaces.
- 8.4 Weldon Parish Council suggested a cohesive and sustainable transport strategy. Northants Police, Northants Fire and Rescue and Office of Police, Fire & Crime Commissioner advocated a greater emphasis on crime and design.
- 8.5 Others, notably developers, suggested increasing levels of housing to meet a wide range of needs, with comments emphasising the importance of sustainable development in the market towns and rural area, including villages, and provision of affordable housing and other discounted housing. Some developers used the answer to this question as an opportunity to promote development sites. A limited number of respondents expressed opposition to more house building.
- 8.6 Some respondents focused on economic growth, diversification of the economy, and improving skills as essential to achieve levelling up. Comments included the creation of business hubs around railway stations, apprenticeship opportunities, provision for flexible home working, and the allocation of employment land. A small number of respondents suggested that logistic development can assist in the aims of levelling up communities in North Northamptonshire. Conversely, one response objected to further warehouses.
- 8.7 Other respondents commented on the role of councillors, community groups, consultation, and suggested areas of further research and evidence.

Officer response to Questions 7 & 8

- 8.8 There were many diverging comments on this question across a broad range of interrelated policy subjects, including community engagement, infrastructure and service provision, job creation, town centre regeneration, and housing delivery, particularly affordable housing. These issues are relevant to many service areas within the council. Comments in relation to spatial options and Local Housing Need are discussed in responses to Questions 9 & 10 and Question 11.
- 8.9 The development of spatial options provides the Council with an opportunity to carefully consider the issues raised during the consultation. This will link to the work undertaken by, and on behalf of, the Scrutiny Working Group as instructed by the Scrutiny Commission which was reported to Executive on 25 August 2022.

The spatial strategy for the distribution of development

Question 9. Should future needs be met by continuing with the current strategy of urban-focused growth. If not, why?



- 73 respondents said 'yes'
- 59 respondents said 'no'

Respondents who answered 'yes'

- 9.1 Respondents recognised that urban-focused growth incorporates Growth Towns and Market Towns, and the influence of commitments was acknowledged in responses. Garden Communities promoters supported the continuation of urban-focused growth with a focus on Growth Towns as the most sustainable approach. A number of extensions to Garden Communities were promoted including to Hanwood Park, Stanton Cross and Weldon Park. Alongside these extensions, additional sites at the Growth Towns were promoted by developers. In contrast, several developers highlighted underdelivery at the Garden Communities (also known as Sustainable Urban Extensions) and challenged future delivery assumptions as justification for a different strategy. Several developers supported continuing with an urban-focused strategy, but that greater emphasis should be placed on Market Towns.
- 9.2 Several town and parish councils were supportive of continuing the urbanfocused approach to protect rural character. Gretton Parish Council supported
 urban-focused growth but raised concerns that failure to deliver in urban
 areas increases pressure on villages "failure to deliver in urban areas is selfdefeating and actually detrimental to achieving the objective of strengthening
 the cultural identities of towns, villages and rural communities".

- 9.3 Oundle Town Council considered that Oundle is of a wholly different character to other market towns given its historic and architectural importance. The Town Council submits that Oundle should have a distinct designation (perhaps referred to as a historic Market Town) and that towns so designated should have limited additional residential and other development in the plan period to preserve those qualities that might enable them to grow their tourist industry.
- 9.4 In relation to statutory agencies, National Highways and Historic England supported continuing with an urban-focused strategy, with Natural England and Environment Agency having no comments.
- 9.5 National Highways highlighted that its preference would be to allocate sites in locations where there is opportunity for sustainable modes of transport to be utilised rather than sole dependence on private vehicle. It stated that "New housing in urban areas is likely to have a lesser impact on the SRN than in rural locations. This is due to reduced vehicle trip generation and availability of key facilities and services locally, thereby minimising journey lengths for employment, shopping, leisure, education and other activities. Therefore, we generally support an increase of development in and around larger settlements in urban areas which benefit from a good connection to amenities and public transport services. However, we recognise that doing so may put additional pressure on the SRN in and around urbans area which may require mitigation schemes to be identified and progressed. Therefore, a balanced approach will help in ensuring the deliverability of housing without putting significant pressure on key urban areas".
- 9.6 Historic England considered that because of the current strategy of urbanfocused growth which has allowed for careful strategic consideration in impacts, the levels of harm to the historic landscape and its landscape setting have been carefully considered and have been able to be mitigated to some degree. They considered that there is potential for a higher risk of harm to the historic environment in a 'Dispersal' approach for growth in villages and there is also a risk in a 'New settlements' approach for freestanding new settlements.

If not, why?

9.7 A significant number of responses who answered 'no' were from the development industry seeking a more flexible spatial strategy, including more development at Market Towns and in the rural areas with various suggestions about how this can be achieved. Several settlements were identified in responses including Market Towns and Villages, with the sustainability of larger villages highlighted. These responses recognised existing commitments and the role of the urban area but frequently and robustly challenged the delivery rates at the Garden Communities, including levels of future delivery and cited references in the Scope and Issues consultation paper to underdelivery. The importance of meeting needs across the area, including in the rural areas was also highlighted in several developer responses.

- 9.8 Barriers to delivery at the Garden Communities, including viability and infrastructure delivery were highlighted in several responses. Miller Homes and Central England Co-operative considered that "A reliance on the existing JCS SUEs as the main basis for future housing delivery is unlikely to be considered sound given the delivery and viability constraints identified in the Scope and Issues Consultation Document. Many of the SUEs identified in the JCS have not been able to keep pace with the planned housing trajectory nor been able to deliver affordable housing. Delivery on several SUE's also remains uncertain".
- 9.9 Similarly, William Davis referenced the under-delivery of the Garden Communities and challenged the references in the document to these beginning to build out at a more rapid rate. They considered that delays to such developments can occur at all stages of the delivery and therefore the plan needs to instil flexibility to ensure that planned development occurs in the most sustainable places and any further delays to the SUEs/Garden Communities do not result in unplanned development.
- 9.10 Hampton Brook, who are promoting several sites promoted a more flexible spatial strategy and highlighted that "Whilst delivering growth in the most sustainable locations across a plan area is fundamentally supported, delivering 67% of all growth across just four settlements carries risks to securing the Plan's full range of priorities, including those resulting from barriers to market absorption, delays in delivery and pressure of existing infrastructure. In this regard the Sustainable Urban Extensions around Wellingborough have been noted as being particularly slow to deliver, largely as a result of the upfront infrastructure requirements needed to bring development forward".
- 9.11 The Home Builders Federation referenced the requirement to meet needs across the area and stated that "The spatial strategy for the distribution of development should meet the housing needs of both urban and rural communities. An overly urban focussed Spatial Strategy limits the potential number of development sites.....If all development sites are large scale Sustainable Urban Extensions (SUEs) and / or New Settlements, there may be long lead in times for the commencement of on-site development and build up to optimum delivery rates. SUEs and New Settlements should be complimented with smaller non-strategic sites, which will ensure a continuous HLS in the short to medium term".
- 9.12 Gladman are promoting sites in a variety of locations and suggested that "the most sustainable settlements outside the main urban towns should be allocated proportionate growth to meet housing needs, as these settlements will play an important role in providing key essential services to surrounding areas. The benefits of focusing growth at settlements such as these is that they have access to existing infrastructure and services and facilities for new residents".
- 9.13 A NNC Councillor stated that "Villages need and want some development so we should let them have this. We should stop encouraging most urban growth

- in SUEs. They take far too long to come forward and are much more complicated to get built. Tresham for instance is stalled because of a lack of road infrastructure".
- 9.14 Some local residents raised concerns about the impacts of current growth, including on the local community and expressed concerns about future growth. Issues raised included the impact on infrastructure, loss of green space, coalescence, etc. Retention of greenfield land and a focus on brownfield sites was raised in responses.

Question 10. Are there any other spatial options not already identified in the consultation document that should be considered?

- 72 respondents provided feedback on other spatial options that should be considered.
- 4 respondents felt that there are no other spatial options that should be considered.
- 10.1 Feedback to this question raised the same issues as those responses made to Question 9 in relation to the Spatial Strategy with several developers recognising existing commitments but seeking more flexibility in the spatial strategy by providing for more growth at Market Towns and Villages and a greater range of site sizes, which is often described in responses as a 'dispersed option'.
- 10.2 Hollins Strategic Land proposed a further spatial option with the majority of development directed towards the urban towns, but with a greater priority given to settlements in the Rural Areas which are evidenced as sustainable and in close proximity to urban areas be they located in North Northamptonshire or lie close to the boundary (e.g. Stamford and Peterborough).
- 10.3 Redrow Homes supported a focus on corridor-based growth along key transport corridors, such as the A45, which it considered will help to spread growth across a wider range of settlements, ensuring market competition and offering the best chance of delivery in the short-to-medium term.
- 10.4 Spatial Options identified in consultation responses included:
 - Urban focused growth centred on Sustainable Urban Extensions.
 - Growth focused on a central corridor through North Northamptonshire.
 - Focus on corridor-based growth along key transport corridors, such as the A45, which will help to spread growth across a wider range of settlements
 - Spreading growth across a wider range of settlements, or at least focusing on sites of a range of sizes in the Growth Towns
 - Combination of the identified Spatial Options (Dispersal, New Settlements, Corridor-Based Growth & Employment Focus)

- Consideration of resident-focused neighbourhoods, with an associated restricted vehicle use limited to the outside of areas.
- A predominantly 'urban focused growth' strategy strongly complemented by proportionate levels of rural housing growth (i.e. the 'Dispersal Option') and residential development alongside existing and proposed employment areas (i.e. the 'Employment Focus Option').
- Majority of development to be directed to the urban towns, but a greater priority given to settlements in the Rural Areas which are evidenced as sustainable and in close proximity to urban areas as set out above.
 Dispersal- various iterations including
 - Growth focused at Market Towns
 - Growth at Market Towns & sustainable villages
 - Growth focused at sustainable villages
- 10.5 The role of potential improvements to transport infrastructure was highlighted, notably rail. One respondent suggested that North Northamptonshire needs an East-West train link from Felixstowe connecting through, Kettering, to Birmingham with a spur to Daventry International Rail Freight Terminal to complement the E24 Freight Route. They suggested that current freight movement uses the E24/A14 dual carriageway which does not contain the long-term capacity for growth and sustainability and will increase carbon emissions. Weldon Parish Council referenced the potential expansion of the rail network to link the urban centres in a sustainable way. Both Titchmarsh Parish Council and Save Titchmarsh and Upper Nene Valley Countryside & Habitats (STAUNCH) stated that North Northamptonshire should be looking to maximise the use of multi-modal transport links. New rail, light rail and bus links should be prioritised ahead of further unsustainable expansion of the road network.
- 10.6 The impacts of development, including on environmental assets was raised in responses. Natural England set out that "Any development of scale, including housing growth, needs to consider the Upper Nene Valley Gravel Pits SPA and the Mitigation Strategy growth above that planned for within the Strategy may require it to be updated and revised so it continues to protect the site from recreational pressures and loss of Functionally Linked Land". Historic England considered that there is the potential for a higher risk of harm to the historic environment in a 'Dispersal' approach for growth in villages and there is also risk in a 'New settlements' approach for freestanding new settlements.
- 10.7 One respondent suggested that the Council should look at creating an Area of Outstanding Natural Beauty in the Upper Nene Valley to help focus the development of visitors to that area.
- 10.8 Respondents also used this question to raise other issues. The need for more affordable homes which stay affordable, and affordable smaller homes was raised by local residents, alongside the need to look at the relative demand for small homes, flats and Housing in Multiple Occupation (HMO's). Infrastructure provision, including the need for more electric vehicle charging

points was highlighted by other respondents, together with the loss of greenspace/woodland.

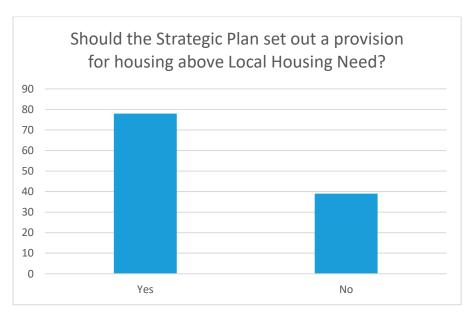
Officer response to Questions 9 & 10

- 10.9 The overall spatial strategy for the distribution of development (particularly housing and employment) is a central element of the plan. The approach taken will be dependent on the response to many of the other issues raised as part of this consultation.
- 10.10 It is noted that there was support for urban-focused growth. At this stage no decision has been made on the future approach, but as recognised in the Scope and Issues document the spatial strategy will be strongly influenced by the extensive existing commitments, particularly at the Garden Communities. It will however be necessary to respond to the issues raised in the responses particularly including robustly assessing the deliverability of the existing commitments over the plan period to understand their contribution to meeting needs.
- 10.11 In addition, the hearing sessions at the recent examination of the East Northamptonshire Local Plan Part 2 raised issues in respect of the delivery of housing provision within the area, particularly regarding the role that towns and large villages could play in meeting demand. It is clear that whilst there have been delays to bringing forward housing delivery through large site commitments, including Garden Communities, that housing completions of smaller/medium sites within some towns and villages in North Northamptonshire have exceeded plan expectations well within the current plan period. The Strategic Plan will need to address these demands and consider whether a strategy can be provided that considers a more "flexible" approach.
- 10.12 Providing future opportunities through the Strategic Plan will therefore need to recognise the accelerated take up of such housing provision in areas where plan requirements at some settlements have been met relatively early in the plan period, have led to pent up demand.
- 10.13 The extent to which there may be an evolution of the spatial strategy in the current plan will depend on several additional factors including the outputs from the Housing and Economic Needs Assessment, Housing and Economic Land Availability Assessment and other technical work including updated evidence on the Special Protection Area and how to respond to the climate change agenda. The plan must contribute to the achievement of sustainable development and strike a balance between economic, social and environmental objectives.
- 10.14 Key elements which will influence the spatial options for the plan include:
 - The scale of growth being planned
 - The need to demonstrate a robust delivery trajectory

- The climate change impacts of locating development in particular locations and the ability to contribute to delivering carbon net zero targets
- The approach taken to meeting social and economic needs in the rural area
- The economic strategy for the area and the key priorities
- The ability of local infrastructure to accommodate growth
- The ability to meet affordable housing needs
- The impact of development on the built, historic and natural environment
- The ability to maximise the benefits of new development
- The viability of development types and locations
- The need to support regeneration and reduce inequality
- The ability to create high quality places and healthy cohesive communities
- Any changes in national policy or relating to the Arc
- 10.15 The next steps will be to identify realistic spatial options and test them against a number of objectives to ensure that the spatial strategy meets the plan's vision and spatial outcomes together with the priorities identified in the corporate plan.

Housing

Question 11. Should the Strategic Plan set out a provision for housing above Local Housing Need? If so, what should this uplift be?



- 78 respondents said 'yes'
- 39 respondents said 'no'

Respondents who answered yes

- 11.1 Respondents who thought the Strategic Plan should set a provision for housing above Local Housing Need (LHN) were mainly from the development industry. These responses set out a range of approaches as to what this uplift should be. Several respondents considered a percentage uplift should be used; the percentages ranged from a 5% to 25% uplift. Many developers raised the issue that LHN provides a minimum starting point and that a number of other factors, including demographic trends, economic aspirations including the Oxford-Cambridge Arc and market signals need to be considered. Some also argued for a minimum increase above LHN of 20% and a separate contingency figure to provide additional choice and flexibility.
- 11.2 Some developers and Gretton Parish Council considered that the Housing and Economic Needs Assessment (HENA) should inform the approach in the Strategic Plan and that this would provide the evidence that is required for LHN. Some developers stated that unless the HENA can factor in the Arc Spatial Framework there is uncertainty over housing and employment needs, provision for housing should therefore be set out as a range that uses the HENA as a baseline and factors in a range of 'policy on' scenarios.
- 11.3 Wellingborough Town Council considered that LHN should be assessed at community level and noted that many areas have Local/ Neighbourhood plans that set out locations for development.

- 11.4 Several developers considered that minimum housing requirements were not appropriate in light of the significant growth ambitions required by the Oxford-Cambridge Arc. It was suggested that the next stage of consultation should include an Arc related growth scenario which would plan for housing figures above LHN. The Home Builders Federation (HBF) and many developers highlighted that the Government's growth ambitions for the Oxford-Cambridge Arc would justify a higher requirement to achieve a balance between housing and employment growth.
- 11.5 Developers and the HBF also raised the issue of aligning residential development with the council's aspirations for local economic growth and that LHN will be insufficient to provide sufficient growth in the local labour force to balance with economic forecasts. It was suggested by Prologis that failing to align economic and housing strategies would mean struggling to meet economic growth aspirations or drawing a greater level of workforce from outside the area creating unsustainable commuting patterns. It was stated by these respondents that there is a clear rationale for adopting a higher approach to housing need that would support the level of job growth that the plan area has the potential to accommodate.
- 11.6 Affordability was highlighted by several respondents, including residents and parish councils. The provision of social and affordable housing was highlighted as an important consideration. Data was provided by some respondents to demonstrate the worsening of affordability in the area since 2011. It was suggested by many developers that an increase in LHN will assist with the affordability of housing. It was also suggested by some respondents that planning for more housing in different locations would help with affordability and market saturation in some areas. A few developers suggested identifying land in excess of the requirement to allow for a flexible approach to delivery.
- 11.7 It is suggested by many developers and a few residents, that a requirement above LHN would also make a greater contribution towards delivering more affordable housing. There was concern raised by such respondents that if LHN is not sufficient then it won't address the affordable housing needs throughout North Northamptonshire.
- 11.8 Providing a contingency was raised in several responses, notably from the development industry. These responses raised several issues discussed in responses to Questions 9 & 10. Developers supported an increase in LHN due to under delivery to date against Joint Core Strategy requirements and delays with delivery at the Garden Communities (Sustainable Urban Extensions (SUEs)), which featured in several responses. Several developers suggested the current spatial strategy which focuses delivery on the Growth Towns is not sufficient to meet requirements. They considered a supply of sites outside of the large strategic sites is required to allow for a contingency and flexibility buffer to ensure delivery across the plan period. It was considered by some developers that the Market towns have the capacity to accommodate additional growth to support the rural economy and meet local needs through schemes like first homes, whereas other developers have

- promoted schemes at the larger villages. It was considered by many developers that the committed supply set out in the Scope & Issues document needed to be reassessed to ensure it was deliverable.
- 11.9 Headlands Area Residents Association suggested a small percentage uplift above LHN provides certainty that sites will not be called forward at short notice because of a shortfall elsewhere. Public Health Northamptonshire considered that contingency should be built into the plan but were not sure on the appropriate level of uplift. They queried whether we are aware of the amount of unoccupied housing and asked if mitigation to address this could be built into the plan.
- 11.10 NNC's Education services highlighted that planning for housing above LHN needs to be considered against the delivery timescales for strategic sites as well as viability and infrastructure requirements. They commented that additional allocations would place pressure on infrastructure, which would need to be mitigated. This could, for example, necessitate the need for new schools or a need for the Council to meet interim demands. They suggested policies should enable recovery of costs via Section 106.

Respondents who answered no

- 11.11 Several respondents referenced the amount of current and future growth and the impacts of this, including on the environment and the need to protect greenspace. One respondent suggested that there is already a significant backlog of planned development, and it is unnecessary to add to this. It was also suggested that there is no benefit in providing above LHN unless there is a corresponding increase in employment opportunity. Pilton, Stoke Doyle & Wadenhoe Parish Council referenced prioritising quality over quantity.
- 11.12 Some respondents highlighted the amount of development at the towns in North Northamptonshire, which they consider are already exceeding requirements. Irthlingborough Town Council considered that Irthlingborough has already met its requirement with Irthlingborough West, and if that doesn't come forward provision has been made at Rushden East SUE.
- 11.13 Weldon Parish Council suggested the need to first cover the current shortfall of 372 homes, and to ensure housing is accessible to local people e-g., shared ownership or low cost rent. Kettering Town Council considered that demand for social housing should be the sole reason for provision above LHN figures.
- 11.14 One respondent suggested LHN should be reviewed after the Census results are known.

Officer response

11.15 The Government requires local planning authorities to provide and maintain an appropriate supply of housing land, which is set out in national policy through the National Planning Policy Framework, Chapter 5, which supports

- the Government's objective of significantly boosting the supply of new homes.
- 11.16 The LHN figure provides a minimum starting point in determining the number of homes needed in an area. The majority of respondents from the development industry considered it may be appropriate to plan for higher levels of housing provision and set out a range of reasons for this. It will be important for the development of the Strategic Plan to consider whether an uplift should be provided to the LHN. Feedback from the consultation will help inform the approach to be taken and the issues that need to be addressed in further detail.
- 11.17 To determine the most appropriate level of housing it will be important to factor in the outcomes of ongoing work in the HENA regarding specific housing needs (including the mix of housing sizes, types and tenures for different groups, and the proportion of affordable housing). Whilst future housing need will be informed by the HENA, in taking into account what an appropriate level of housing provision should be, the Council will need to carefully consider its ability to provide for a need that is both deliverable and flexible, and that can help meet the range of future housing requirements within the area, including providing for affordable housing.
- 11.18 This will be informed by the HENA and the relationship with the economy of the area, recognising the need for a sustainable balance between homes and jobs, as set out in the current JCS. The Council will need to assess whether there are economic opportunities, including funding opportunities that could provide justification for planning for provision above LHN.
- 11.19 In considering potential levels of housing, issues such as the impact on existing and planned infrastructure, market saturation, etc. will need to be robustly assessed. It would need to understand, for example, the implications of environmental and infrastructure capacity constraints and how these might be addressed. It would also need to evidence a level of future development that was sustainable, particularly in relation to the level of economic investment which could be delivered and avoid market saturation and delays to housing completion rates throughout the plan period.
- 11.20 As discussed elsewhere, it is understood that the government is no longer progressing the Arc Spatial Framework, which is a significant change in the planning context. It should also be noted that at present, no adjoining authorities have requested that North Northamptonshire assists in meeting unmet housing need arising beyond its immediate administrative boundary.

Question 12. What measures could the plan include to diversify the housing offer or otherwise increase the rates of housing delivery?

- 12.1 97 respondents provided feedback to this question. Several of the issues/measures raised in responses were as set out and discussed in the consultation document.
- 12.2 Some respondents considered that there should be penalties for developers who don't implement permissions in a timely manner or deliver schemes as anticipated e.g., in relation to affordable housing provision. Suggestions for penalties included financial penalties or losing planning permissions.
- 12.3 Several respondents highlighted the need for more affordable housing, including council-built housing on appropriate sites/NNC building homes with priority given to local residents. Some of these responses linked this need to avoiding more Houses in Multiple Occupation. Kettering Town Council stated that there is demand for more social housing and this would be the sole reason for increasing housing provision above the local housing need figures. However, they considered there is equally a risk in producing developments which are only social housing, as it will, over time, produce areas likely to be in need of levelling up. Wollaston Parish Council considered the plan should ensure inclusivity, i.e. bungalows for the elderly, vulnerable and families with disabilities. Some site promoters considered that the most appropriate method is to identify the mix of dwelling types that is deficient from the housing needs assessment/survey and then draft planning policies to achieve this.
- 12.4 More brownfield development/regeneration, including within the town centres was referenced in several responses. Higham Ferrers Town Council referenced a need for policies encouraging urban renewal, redevelopment of brown field sites, windfall and infill sites subject to being well designed and appropriate to the character of the existing area. The re-use/conversion of buildings/empty dwellings was also highlighted. Persimmon Homes North Midlands considered that some form of urban densification may be appropriate in certain locations either town centre/edge of town centre or in and around the railway stations which can act as commuter hubs for people working in London.
- 12.5 Several developers suggested that there is a need for a range and choice of sites, including smaller, more deliverable sites across a wider range of settlements. These responses raised the same issues that are discussed in other questions notably Questions 9 & 10. Tata Steel and others noted that "Looking back at the adopted Core Strategy, housing delivery has been significantly bolstered through the delivery of smaller sites in the Market Towns and Rural Area, with the housing targets for these town/areas often met before the Part 2 Plans were published. Planning for additional growth in these settlements will maintain this source of supply, which is generally free from infrastructure constraints, can be delivered quickly and which provides access to the market for a much wider range of housebuilders".

- 12.6 Several developer responses also considered that the housing requirement should be increased to facilitate delivery. The Home Builders Federation (HBF) stated "All households should have access to different types of dwellings to meet their housing needs. To ensure that these housing needs are met, the Council should allocate suitable sites for a wide range of different types of development across a wide choice of appropriate locations (also see HBF answer to Q9 above)".
- 12.7 Custom and Self-Build and the provision of suitable sites for this featured in several responses from a range of respondents, including ensuring smaller plots are available for smaller builders. The HBF stated that the Council should support self & custom build by ensuring that the Strategic Plan will result in a wide range of different self & custom build housing opportunities. They considered it is unlikely that self & custom build serviced plots on larger residential sites will appeal to those wishing to build their own home. Great Oakley Estate suggested that larger scale sites proposing more than 500 new homes could be required to provide a wider mix of housing i.e., in addition to general private and affordable homes, and PRS (Private Rented Sector). This could include a percentage of custom and self-build and also build to rent products.
- 12.8 East Midlands Community Led Housing responded that in order to properly "broaden the range of house builders operating across North Northamptonshire's main development sites" there needs to be more explicit reference made of the community-led housing sector and how this can enable local people to create a range of housing and neighbourhood outcomes and a range of tenures.
- 12.9 Modular housing was also referenced in several responses. A NNC Councillor stated the need to "Adopt a council-led plan based on a co-operative affordable eco-homes scheme for pre-fab houses in developments". One respondent referenced that with offsite modular construction, good construction conditions can be controlled and the quality can be monitored and checked through the production process with appropriate certification and guarantee of quality given. Weldon Parish Council highlighted a more collaborative approach to housing with delivery partners also embracing carbon zero and modern methods of construction.
- 12.10 The Garden Communities promoters/developers raised several issues.

 Hanwood Park stated that as suggested in the Scope and Issues document, broadening the range of house builders operating across North Northamptonshire would help to diversify the housing offer and enhance delivery rates.
- 12.11 Great Oakley Estate referenced infrastructure planning and highlighted that "Earlier planning for infrastructure and services delivery on large scale urban extensions together with potential public sector support and a recognition of the viability constraints on early phases to ease the burden on early phases would lead to potentially more outlets being enabled from these schemes, earlier, which would boost the supply of housing off these large scale sites".

Vistry Group and Stanton Cross Developments stated that "The reliance on a small number of developers is not the only reason why large sites have been subject to slower build-out rates than was originally expected. Rather, the build-out rates of strategic sites would benefit from additional resources being focused on NNC's Planning and Highways departments in order to allow for quicker decision-making in relation to Reserved Matters and condition discharge applications in particular".

- 12.12 It is noted that responses to the consultation raised several of the issues that were identified in the consultation document. They provide valuable evidence to inform the development of the Strategic Plan.
- 12.13 The issue of delivery, particularly on larger sites is a nationwide issue that has been recognised by Government. A number of the Garden Communities have not progressed as quickly as expected. Substantial work has gone into progressing the Garden Communities including seeking to resolve viability and infrastructure issues with support from Homes England. Whilst it is expected that delivery at the Garden Communities will accelerate and will be a key element of the Strategic Plan it will be important to ensure delivery assumptions are as robust as possible and all measures are undertaken to resolve barriers to delivery. The issues raised regarding the spatial strategy are discussed in more detail in response to Questions 9 & 10.
- 12.14 As referenced in the consultation document, a series of government reviews into housing supply, including the Letwin review (October 2018) and Bacon review (August 2021), identified possible measures to seek to increase the supply of new homes to the market, including Modern Methods of Construction and diversifying the housing offer on strategic sites through different tenures and house types including ensuring sufficient plots for self-build/custom-build housing. This will be an important issue for this plan to address. A North Northamptonshire self and custom build register was launched on 31st October. This will allow interest to be expressed in projects that become available in the future and will help to plan for the level of demand for these build plots.
- 12.15 Capacity of NNC's Planning and Highways departments is outside the scope of the Strategic Plan, but the Council is currently exploring resources and service delivery as part of restructuring proposals.

Question 13. Are there any particular types of specialist housing that you feel there should be more of? Do you have any evidence to support this?

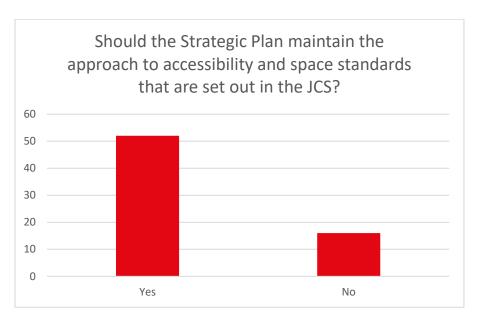
- 13.1 81 respondents provided feedback to this question. Several respondents supported the approach set out in the consultation document. Public Health Northamptonshire referenced affordable housing and supported housing as described in the document.
- 13.2 The role of the Housing and Economic Needs Assessment (HENA) in informing the approach was highlighted in responses. Stanton Cross Developments LLP and Vistry Group considered that any requirements the Strategic Plan should be based on the evidence compiled in the HENA to ensure that they are sound in accordance with NPPF paragraph 34. They also referenced the requirements in the NPPF and PPG to undertake a viability assessment.
- 13.3 Hanwood Park LLP also referenced the HENA but suggested that it must be treated as a starting point and be informed by a consideration of wide growth objectives. They highlighted that the housing offer, and quality of residential environments and wider quality of place, could influence business location decisions. They suggested that therefore, policies on housing mix may need to consider how the housing offer can also be responsive to supporting North Northamptonshire as an attractive location for business as well as meeting indigenous housing needs a balance between responding to housing needs and encouraging inward investment in higher value employment.
- 13.4 Several respondents highlighted the ageing population and the need to provide suitable provision for older people, including adaptable housing. Titchmarsh Parish Council noted that there is a national shortage of intermediate housing to help older people with long-term health conditions to be released from hospital before they move back to their home. Several different types of older persons housing were identified by respondents including:
 - Small bungalows
 - Provision of grouped accommodation, such as new retirement villages to allow for downsizing.
 - Sheltered and normal bungalows
 - Warden controlled homes
- 13.5 The Home Builders Federation considered that specialist housing for older people including retirement living or sheltered housing, extra care housing or housing-with-care and residential care / nursing homes should be provided. They commented that to provide homes for older people, the Council should allocate sites for older persons housing subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres. Churchill Retirement Living and McCarthy Stone felt that the best approach towards meeting the diverse housing needs of older people is for

- the Local Plan to give the earliest consideration towards how best to meet these needs and to include a standalone policy in this respect.
- 13.6 The need for affordable housing, including in the rural area and particularly for younger families featured in several responses, including from Gretton Parish Council and Wellingborough Town Council. Gretton Parish Council suggested that there should be an increase in smaller starter homes so that young families can stay with their local community. The Parish Council suggested that the overall rise in house prices in North Northamptonshire may be attributed to the fact that many of the new developments focus on 4/5 bedroom "Executive Homes" which demand higher prices. They considered this balance needs to change, particularly in the Garden Villages. Similarly, Wellingborough Town Council suggested there is a need to deliver more affordable housing and Housing Association housing. They refer to evidence from the effects of the pandemic and an increase in the cost of living effecting families on low income and key workers shows that many are struggling to purchase their own homes. The Town Council also highlighted the need to provide small care facilities for all ages, abilities, and issues.
- 13.7 Lowering the threshold for affordable housing was raised, alongside concerns that viability assessments are reducing affordable housing provision. A Geddington resident considered that there should be more starter homes for young people to live in villages and that there have been very few houses in the starter home category for young people without children or young families to buy. Some developers/site promoters referenced the need to deliver affordable housing in a range of settlements and that allocation of their sites would support this. Hampton Brook who are promoting sites in a range of settlements considered there is a need to ensure sufficient affordable housing is brought forward in through the allocation of a range sites in the Growth Towns and Villages in these locations where the need for affordable housing is particularly acute.
- 13.8 Several respondents felt that more should be done to provide provision and support for the homeless. A NNC Councillor noted that the Rough Sleeping Team have noted that more specialist housing would be useful for those with extra needs around mental health support.
- 13.9 Custom/Self-Build (CSB) housing was flagged, including by developers/site promoters. Roebuck Land & Planning stated that opportunities for Custom and Self build plots should be encouraged through policies that enable schemes to come forward within allocated sites and on non-allocated sites in sustainable locations to support evidential demand from the CSB Register. Similarly, the Home Builders Federation set out that the Council should also support self & custom build by ensuring that the Strategic Plan will result in a wide range of different self & custom build housing opportunities. They feel it is unlikely that self & custom build serviced plots on larger residential sites will appeal to those wishing to build their own home.

- 13.10 Meeting the needs of disabled people and the provision of adaptable and accessible housing was also highlighted in several responses. Burton Latimer Town Council strongly responded that the Strategic Plan should give greater consideration to the needs of disabled people. Weldon Parish Council stated that modern housing communities should be capable of adaption for peoples changing needs as they grow older so that we create a culture where rightsizing is seen as the right thing to do.
- 13.11 The need for smaller housing was referenced in responses, including the difficulties of people being able to downsize. One respondent stated that "Single people and people with no children normally get to live in a block of flats. If you've ever lived in a block of flats especially ground floor then you will realize how horrendous it can be. No more blocks of flats to be built it's unfair".

- 13.12 The issues raised in responses will be fully considered in the development of the Strategic Plan. Planning policy officers will work with other departments across the Council to develop the approach in the Strategic Plan and to ensure the issues raised in responses are understood and dealt with appropriately.
- 13.13 The approach to specialist housing provision in the Strategic Plan will be informed by the HENA and other evidence to ensure a robust, deliverable approach that meets the requirements of national policy and local needs.

Question 14. Should the Strategic Plan maintain the approach to accessibility and space standards that are set out in the JCS? Is there any evidence to support exceeding these?

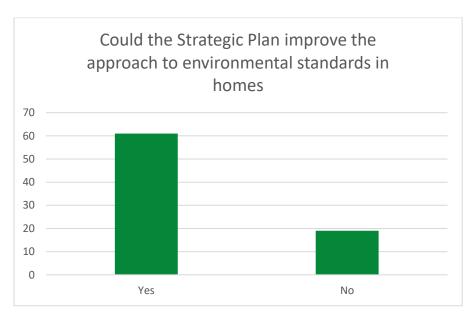


- 52 respondents said 'yes'
- 16 respondents said 'no'
- 14.1 Of the respondents who supported maintaining the current approach only a few provided any additional comments. Several suggested that there is a need to ensure that the standards are indeed treated as a minimum as many planning applications treat them as a maximum with some highlighting that developers consistently try to provide buildings that do not meet the current requirements.
- 14.2 One respondent considered that the lack of social care is leading to more multi-generational households for which there is a shortage of provision in terms of both accessibility and space standards. Another respondent suggested that all areas should be designed as 'wheelchair-useable' to maintain an evenness in the abilities of diverse households to move around new built development settings, and to maximise the degree of 'visit-ability' within domestic properties that must underpin opportunities for lasting contact between neighbours. Conversely, another respondent commented that standards should not be exceeded, as with an energy crisis more resources are needed in the heating of larger properties.
- 14.3 Vistry Group referred to the government's guidance that these optional technical standards should only be adopted where they address a clearly evidenced need, and where their impact on viability has been considered. They also stated that notwithstanding the outcome of the Viability Assessment, policies in relation to accessibility and space standards should

- be sufficiently flexible to allow developments to depart from those standards where it is demonstrated that they will not be achievable due to viability, site constraints, site feasibility and other relevant factors.
- 14.4 Of the respondents who responded 'no', the comments from some developers emphasised the need for robust evidence, including viability testing to support incorporating the optional national standards within the Strategic Plan including Stanton Cross and Miller Homes who referenced the Housing and Economic Needs Assessment (HENA).
- 14.5 The Home Builders Federation also referenced evidence and viability and stated that if the Council wishes to apply the optional standards for accessible & adaptable homes and NDSS, this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49) and the latest NPPG. Their response also noted that if the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020, the Council's proposed policy approach will be unnecessary. Rosconn Strategic Land and Henry H Bletsoe and Son LLP considered that the current JCS requirement for all dwellings to meet Category 2 accessibility standards should be reviewed as it is excessive and introduces considerable and unnecessary build cost to projects.

- 14.6 The government recently announced some important changes to building regulations in England. In response to the consultation it took on raising accessibility standards in new Homes (part M) it is proposing to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) as a minimum standard for all new homes. Where M4(2) is impractical the lower M4(1) standard will apply.
- 14.7 Local authorities will continue to be able to specify in their local plans a proportion of new homes to be built to M4(3) standard (fully wheelchair accessible) where a need has been identified and evidenced.
- 14.8 The HENA is intended to provide the evidence of need to support the policies going forward on accessibility and space standards and a final report is due shortly. All policies will need to be assessed for their impact on viability in accordance with the relevant government guidance.

Question 15. Could the Strategic Plan improve the approach to environmental standards in homes? If so, what could be improved and is there any evidence to support this?



- 61 respondents said 'yes'
- 19 respondents said 'no'
- 15.1 Of the respondents that answered 'yes' and provided additional comments, including residents, town and parish councils, the overwhelming response was that the plan should seek to exceed national minimum environmental standards and all new homes should have heat pumps, heat efficient glazing and solar panels, and with proper insulation so they can be 'Net Zero' from day one, without the need for retrofitting. The need for better insulation was frequently referenced. Several respondents made the comment that high levels of energy efficiency reduces the cost of energy for residents. Whilst some respondents noted that high environmental standards in buildings may increase the build cost, they highlighted it significantly decreases the running cost, thus the life-time cost of high standards is cost effective.
- 15.2 There were a number of comments about the need to introduce ground source heat pumps, particularly in the light of the current policy to ban gas boilers in new homes after 2025. One respondent commented that a much higher standard of thermal efficiency will be critical if homes are to be heated with heat pumps which are not effective or economic in homes with the current standard of insulation. Another identified issues with energy ratings/insulation, ventilation and mould. They highlighted that properties that are well insulated but not properly ventilated can cause mould issues which can lead to serious health issues for residents. They also highlighted as global

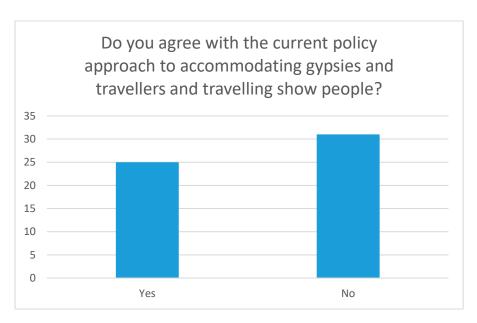
- temperatures increase heat stroke and other heat related issues may become more prevalent in properties that are unable to keep cool. One respondent thought that area/community heating systems should be encouraged, particularly if linked to sustainable energy generation.
- 15.3 Several respondents including Natural England referred to the need for better design, more sustainable construction and better aspect gardens to make the most of solar gain. Natural England highlighted that improvements in resource efficiency in new homes can be achieved by rainwater harvesting, installation of solar panels, and construction of highly energy efficient homes (both cooling and heating). One respondent suggested the use of offsite modular construction where construction conditions can be controlled and monitored and checked through the production process with appropriate certification and guarantee of quality given. They highlighted that such dwellings use 67% less energy to build compared to an equivalent traditional built project. The Passivhaus international design standard was also recommended as reducing energy use from buildings and delivering high standards of comfort and health. The 'Home Quality Mark' which rates homes on quality and sustainability was also referenced and it was suggested that a high standard could be set.
- 15.4 One developer suggested that as the larger volume housebuilders standard house type is designed to meet Building Regulations they tend to be reluctant to exceed these. The response considered that small to medium sized developers are better placed to seek to innovate with a bespoke approach, more readily flexible toward exceedance of building regulations and innovation. It also set out that the plan should allow and encourage decision takers to give more weight to development that is highly sustainable.
- 15.5 Respondents also referred to the need for biodiversity improvements such as swallow, swift and bat boxes built into new houses and hedgehog highways through garden fences. The Environment Agency (EA) suggested the provision of good quality flats with communal gardens associated with green & blue infrastructure would have less land take than individual houses with very small gardens and would secure more green infrastructure and associated blue infrastructure. Natural England also recommended considering the surroundings to homes and potential standards this could contribute to (e.g. Green Infrastructure).
- 15.6 The EA also referenced the Integrated Water Management Framework (IWMF) that they are developing for the management of water in the Oxford-Cambridge Arc. They considered the IWMF will provide a model approach for water planning within the Arc, help deliver environmental net gain and contribute towards climate resilience and adaptation. Alongside this the EA highlighted that ambitious targets will be required to reduce consumption and demand of water to reduce pressure on existing resources. They suggested this could be achieved by developing high build standards, water efficiency targets and retrofitting requirements, integrating water reuse schemes and

- trailing innovative technology. Another respondent commented that Water consumption of 110 litres per person per day should be embedded to drive improvements in home appliances and to support Anglian Water efforts to educate their customers about the scarcity of water. They suggested that water supply will be one of the major constraints on development in our region.
- 15.7 Those that responded 'no', and made comments were predominantly, although not exclusively from the development industry (building industry and landowner representatives). The view they expressed was that the plan should not include very specific environmental standards for new homes but should instead be led by the National Building Regulations. Vistry Group commented that as the Government's sustainability standards are seeking to achieve net zero carbon by 2050 (as NNC is) this will therefore, itself implement a reasonable pathway to achieving those environmental standards. This would also ensure that the policy is future-proofed and does not quickly become outdated if the Government was to require an increased level of environmental performance. They considered that approach would also align with the Government's intention to implement a standardised approach for such requirements that would develop the economies of scale required to reduce the cost of achieving these sustainable construction and design standards. The Home Builders Federation and Miller Homes stated that if the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the National Planning Practice Guidance.
- 15.8 Rosconn Strategic Land and Henry H Bletsoe and Son LLP commented that increasing environmental standards will inevitably mean that the build cost of projects will rise. They suggested this must be seen against a backdrop of increasing build costs across all construction sectors. They highlighted that according to RICS (November 2021) construction materials costs in the UK have reached a 40-year high. They suggested the evidence suggests that accelerating the introduction of improved environmental standards in homes in the short term (ahead of Building Regulations) will negatively impact on the affordability of homes as house prices increase to offset build cost inflation.

- 15.9 The majority of respondents supported high environmental standards and improving these in the Strategic Plan. Many of the comments made raised issues are already reflected in the existing Joint Core Strategy Policy 9. It already requires measures to limit water usage to 110 litres in new dwellings as the area is classified by the Environment Agency as an area of water stress. This should therefore already be being added as a condition on planning applications.
- 15.10 We will need to explore the potential to exceed Building Regulation standards in advance of the introduction of the Future Homes and Building Standards in

2025. This will need to be linked to the zero-carbon target set within the plan and be mindful of any potential implications for the viability of delivering sites and the affordability of new homes. The point made about considering the lifetime cost of standards is an important consideration that will need to be understood as the plan is developed. A viability assessment will be undertaken consistent with national guidance and be a key part of the evidence base to test potential standards and inform the Strategic Plan.

Question 16. Do you agree with the current policy approach to accommodating gypsies and travellers and travelling show people? Please explain your answer.

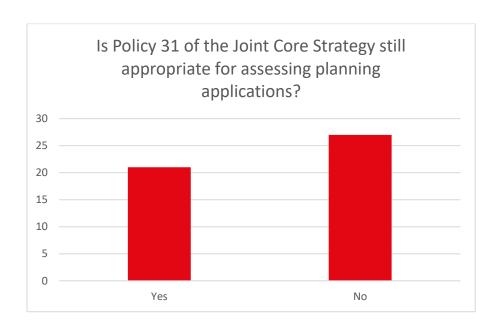


- 25 respondents said 'yes'
- 31 respondents said 'no'
- 16.1 The need to accommodate the requirements of gypsies, travellers and travelling show people was highlighted by some respondents.
- 16.2 One of the respondents that supported the current policy approach commented that it is balanced. Another respondent disagreed commenting that there is no coherent policy.
- 16.3 Some respondents suggested the current policy approach should be developed further. Respondents identified designing out crime, health and wellbeing of occupants, sites located sensitively for traveller and local communities, transparency of occupants, designated areas, site and pitch design as issues that should be considered, as well as supporting enforcement and licensing

- 16.4 Gretton Parish Council explained the difficulty of answering this question until further evidence is available and suggested a Gypsy and Traveller Liaison officer needs to be put in place to support any strategy. Confusion was expressed by a respondent that the Council is seeking to commission further evidence.
- 16.5 One respondent considered residents should be consulted on the best placement of sites and another also highlighted community engagement.

 Another respondent expressed concern that unlawful sites have been allowed and enforcement ineffective.
- 16.6 Some respondents objected to the principle of providing permanent sites for gypsies and travellers or that they should not be treated separately in policy terms from other housing needs. Another respondent suggested that the approach to travellers must be balanced with investment for all local people.
- 16.7 One respondent asserted that travellers that do not meet the definition specified in national policy should not be forced to move pitches. They suggested the fact they are using the designated pitches shows there is an underlying issue with availability of affordable housing. They further suggested that addressing affordable housing would resolve the issue naturally rather than forcing people out with nowhere else to go.
- 16.8 Great Oakley Estates expressed concern at the viability impact of sites on urban extensions and that provision should be on standalone sites.
- 16.9 Kettering Town Council suggested the policy should be geared to making sure that the number of unauthorised encampments in urban areas is diminished by ensuring that sufficient permanent and transit sites are provided across North Northamptonshire, avoiding concentrations of sites, and considering areas remote from urban areas.
- 16.10 Some respondents provided general comments on gypsy and traveller issues which are not matters that can be addressed by the Strategic Plan, including taxes and fly tipping.

Question 17. Is Policy 31 of the Joint Core Strategy still appropriate for assessing planning applications? Are there any changes you would like to see and why?



- 21 respondents said 'yes'
- 27 respondents said 'no'
- 17.1 The main issues raised by respondents that considered Policy 31 of the Joint Core Strategy still appropriate for assessing Gypsy & Traveller planning applications largely focused on implementation.
- 17.2 Gretton Parish Council commented that Neighbourhood Plans need to be adhered to when assessing all planning applications, including Gypsy & Traveller accommodation. Pilton, Stoke Doyle & Wadenhoe Parish Council considered that the planning department needs to be adequately resourced to respond promptly to queries and planning applications
- 17.3 Wansford Parish suggested more consideration should be given to low impact, low energy properties which may be outside the immediate development areas.
- 17.4 The main issues raised by respondents who disagreed Policy 31 of the Joint Core Strategy was still appropriate included amendments to policy and implementation issues.
- 17.5 Several local residents suggested a need for more accountability and consultation and that local residents need to be listened to, with one commenting that planning appears to be biased in favour of developers. One respondent suggested there should be a refusal of retrospective planning applications. Another highlighted that Policy needs to be followed and strengthened where possible in relation to enforcement and non-compliance

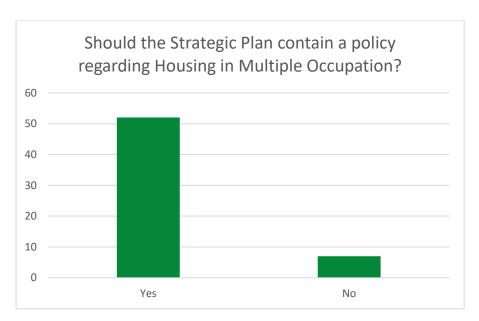
- of regulations. The need to pay attention to neighbourhood planning was also raised.
- 17.6 The need for better provision of affordable housing was raised by respondents. One respondent suggested that travellers that do not meet the definition specified in national policy should not be forced to move pitches. They highlighted the fact they are using the designated pitches shows there is an underlying issue with availability of affordable housing. They suggested that addressing affordable housing would resolve the issue naturally rather than forcing people out with nowhere else to go. Kettering Town Council considered there needs to be a greater focus on securing better quality housing.
- 17.7 Several amendments to policy were suggested, with one resident considering that the policy is outdated. These amendments included:
 - Objection to criteria (a) of Policy 31 that requires the site to be closely linked to an existing settlement on the grounds that all other parameters are then compromised. It is argued that sites should be on out of town and remote brownfield sites otherwise any existing settlement must be adversely affected by such a development
 - Criteria (g) should refer to cumulative impact on the settled community in the same way as (b) refers to cumulative effect on infrastructure
 - There seems to be insufficient weight to environmental matters
 - Great Oakley Estate expressed concern at the viability impact of developments and considered that such sites should not form part of urban extensions
 - Permanent pitches should be subject to the same planning requirements as any other housing development
 - There needs to be a policy restricting use of the sites as being only temporary as they are travellers
 - Further criteria including minimum pitch size to ensure trailer caravans as well as statics or chalets can be accommodated, adequate residential amenity, including sanitation facilities, space for travelling visitors, and different criteria for owner occupied family pitches and commercial rental pitches

Officer response to Questions 16 & 17

17.8 Amendments to the current policy approach will be informed by responses to the consultation and based on updated evidence. Views from respondents were split, with a small majority considering Policy 31 of the Joint Core Strategy inappropriate for assessing planning applications. Multiple issues and changes were suggested by respondents that will need to be carefully considered in the context of updated evidence.

17.9 The approach in the Strategic Plan will be strongly influenced by the preparation of the Gypsy and Traveller Sites Allocation Policy DPD. This will identify projected need for gypsy and traveller accommodation and will seek to allocate land to provide sufficient pitch numbers to meet the identified need.

Question 18. Should the Strategic Plan contain a policy regarding Housing in Multiple Occupation? If yes, please explain.



- 52 respondents said 'yes'
- 7 respondents said 'no'
- 18.1 The main reasons raised by respondents who considered the Strategic Plan should contain a policy regarding Housing in Multiple Occupation (HMOs) were concerns about the negative impact on communities and changes to the character of the area, as well as noise and pressure on parking provision. Others commented on the loss of family housing, conversion of unsuitable properties, and impacts on infrastructure, public services, and property prices.
- 18.2 Some respondents made suggestions regarding how HMOs provision can be better regulated:
 - Headlands Area Residents Association and others indicated that the density or percentage of HMOs in any given area should be addressed
 - Respondents including Cottingham Parish Council, Ecton Parish Council, Public Health Northamptonshire, Wellingborough Town Council, and others supported the provision of standards and guidance to ensure safe and healthy homes, including adequate size, with sufficient space to live, and reasonable level of windows and facilities
 - A test to ascertain whether a HMO will have an adverse impact on surrounding properties

- Wellingborough Town Council suggested HMO provision provides climate change mitigations
- Northants Police, Fire and Rescue Service suggested developments are master planned incorporating the principles of Secured by Design
- 18.3 Several respondents recognised HMOs form an important part of the housing market to meet a certain need. One respondent encouraged the development of purpose-built properties.
- 18.4 For some respondents HMOs should be discouraged or banned with one suggesting a need for more temporary serviced accommodation as an alternative. One respondent issued a warning that landlords are bypassing regulations by advertising to find groups to rent homes as one household.
- 18.5 A North Northamptonshire Council Councillor suggested flats can be seen in the same category and that too many in an area is not desirable and needs to be controlled.
- 18.6 Of the respondents who answered 'no' to the question only one qualified their answer by suggesting provision is made in the Part 2 Local Plans.

Officer response

18.7 Overall, the responses were positively in favour of incorporating a policy within the Strategic Plan. It is acknowledged that HMOs play an important part in providing a mixture of housing to meet certain needs, but the consultation responses outline a range of concerns and issues associated with HMOs that need to be carefully considered in the development of the Strategic Plan. In addition, it will be important for the Strategic Plan to consider the investigation being undertaken into the impact of HMOs in North Northamptonshire and the options for policy interventions, including the results of a separate consultation on HMOs undertaken by the Council between 15 July and 9 September 2022, as reported to Members of the Planning Policy Executive Advisory Panel on 24 October 2022.

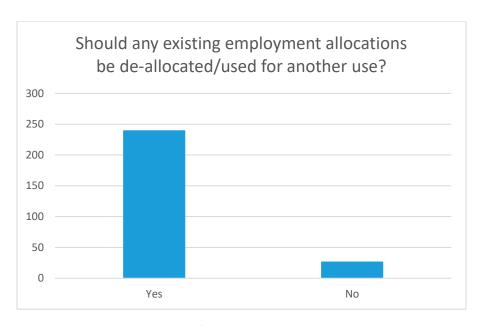
Economic growth

Question 19. What can the Strategic Plan do to support the delivery of committed employment sites?

- 19.1 66 respondents answered this question. The delivery of necessary infrastructure and investment to deliver sites was highlighted in responses alongside the council taking a more active, and in certain circumstances, direct role in bringing forward sites. Isham Neighbourhood Plan Steering Group and Isham Parish Council stated that "To cope with the development north of the village, and to ensure an enhanced environment, the Plan needs to catch up with vital infrastructure, in this case, the Isham Bypass and the restoration of the existing A509 as it passes through the centre of the village into a more environmental space with the reduction of tarmac".
- 19.2 Several respondents referenced the need to increase skills and training, including higher education facilities for local residents to access and bringing people to the area seeking skilled employment. Some respondents flagged labour force issues and a shortage of available workers.
- 19.3 The future role of logistics featured in several responses to this question with some respondents stating that sites should not be used for warehousing or that the provision of future warehousing be limited Titchmarsh Parish Council considered that developers who want employment sites should be directed towards those already committed, and suggested the council refuse inappropriate locations elsewhere. In contrast several developers suggested that the Strategic Plan should recognise the higher level of demand for logistics in North Northamptonshire.
- 19.4 Several responses referenced the need for greater diversity of employment opportunities and concentrating on more high skilled employment. The importance of planning for failure by not putting all your eggs in one basket/being overly reliant on one type of employer was raised. Pilton, Stoke Doyle & Wadenhoe Parish Council considered the Strategic Plan should focus on delivering productive employment opportunities such as start-up technologies, manufacturing, etc.
- 19.5 Some respondents from the development industry question whether committed sites are the right sites. Tritax Symmetry stated that "The local planning authority should examine all committed sites that have not come forward and consider whether the allocation is appropriate and will deliver the required number of jobs". Similarly, Prologis suggested a range of interventions that could be used to support the delivery of committed employment sites including engaging positively with landowners, removing red tape and front-loading infrastructure requirements. Notwithstanding this, it considers that "selecting the right site in the right location, and with the right characteristics, is essential to ensuring successful delivery and realising the benefits of development".

19.6 Kettering Town Council stated that the approach needs to be evidence-led "This needs to be evidenced led. It cannot be denied that logistics continues to play an important part in the economy of the area, and logistics should be seen as a way of attracting in manufacturing uses and office uses to sit alongside them and make it affordable to develop for all uses". Hanwood Park LLP stated that support for employment provision as a whole must be informed by an understanding of evolving trends and the impacts of the Covid-19 pandemic.

Question 20. Should any existing employment allocations be de-allocated/used for another use? If so which sites and for what use?



- 240 respondents said 'yes'
- 27 respondents said 'no'
- 20.1 Several respondents (including local residents, developers and parish councils) agreed that some existing employment allocations should be deallocated and considered that a detailed assessment of employment allocations should be undertaken.
- 20.2 Developers stated that if there are barriers to delivery then alternative employment sites should be allocated/alternative uses should be sought for such sites, such as housing. In contrast, other respondents, notably residents and parish councils, considered that should sites be de-allocated, additional sites should not be identified, particularly if evidence shows an over-supply. Both Titchmarsh Parish Council and Save Titchmarsh and Upper Nene Valley Countryside & Habitats (STAUNCH) did not think more sites should be identified for employment use, particularly as many brownfield sites in and around Corby remain undeveloped. They suggested that as jobs generation targets have been exceeded it may be that some undeveloped committed employment sites could be released for other purposes.

20.3 The amount of warehousing in North Northamptonshire was highlighted by residents alongside the need to diversify the economy. Gretton Parish Council stated that the aspiration should be to build more research/science laboratories and considered there should be a shift from warehousing to industries to provide people with the skills opportunity to progress, a view echoed by Pilton, Stoke Doyle & Wadenhoe Parish Council and Ecton Parish Council amongst others.

If so which sites and for what use?

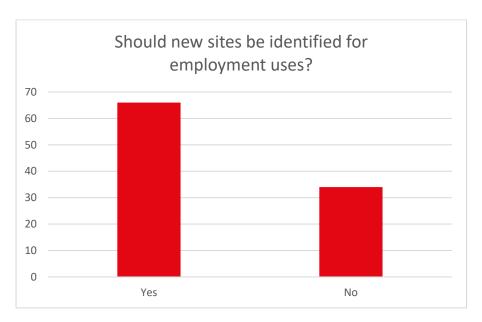
- 20.4 Most responses seeking deallocation of existing employment allocations related to the Kettering North site, which many respondents referred to as Weekley Woods or Weekley Hall Woods. This site is allocated in the Joint Core Strategy (JCS), primarily for employment uses (Policy 36). A planning application has been submitted for part of the site. These responses overwhelmingly arose from local residents, including the Save Weekley Hall Wood campaign group. These responses stated that the site should be deallocated and maintained for its current use which respondents often described as open space, or alternatively should be turned into a Country Park or designated as a Site of Special Scientific Interest. A NNC Councillor highlighted the wealth of wildlife for local residents and suggested the area could be used as a solar farm which would allow for the enhancement of local biodiversity or re-negotiated as a biodiversity net gain site. Reasons given in responses about this site included:
 - Over 20,000 residents have signed a petition to save it.
 - That the site is not suitable for warehouses
 - It is an important site for residents, providing a number of benefits, that has become particularly important during the post Covid period
 - Wildlife, biodiversity value

20.5 Other sites identified in responses included:

- That parts of Rockingham Motor Racing Circuit Enterprise Area should be deallocated due to the presence of priority habitat which cannot be compensated in an ecologically feasible or financially viable manner.
- Rushden East Sustainable Urban Extension (SUE): Higham Ferrers Town Council noted that one main area of employment has been proposed. This is not supported by the Town Council and there is a desire to see mixed use for the area allocated. The Town Council also suggested that there should be fair representation for the relevant town and parish councils on any North Northants Council Committees/Boards when considering SUE Masterplans.
- Wansford Parish Council referenced the impacts of several industrial sites in rural areas which they feel have very poor access for large vehicles. They suggested that where existing sites do not have immediate access onto main roads, avoiding local communities, their expansion should be stopped and the owners encouraged to focus on less transport related business.

- Nene Valley Farm, Rushden: Ashfield Land, the site promoters stated that
 in order to address viability matters associated with the site constraints,
 there must be greater flexibility within a revised Policy 35 to allow for a
 wider range of employment generating uses than those sought under the
 current site allocation.
- 20.6 Several site promoters stated that every effort should be made to retain employment allocations as the likely alternative will be housing uses. Some developers considered that employment land should not be de-allocated, and instead the Strategic Plan should identify more strategic employment land. The developer Newlands stated that in their experience there is not an oversupply of employment land, particularly in relation to B8 logistics, where demand is considered to outstrip supply.
- 20.7 Hanwood Park LLP recognised that the Housing and Economic Needs Assessment (HENA) evidence base will inform the future approach. They set out that in reviewing employment land allocations, part of the process may require a review of the employment components of the Garden Communities, to ensure there is a good balance in terms of the supply of employment land mix and sustainability. They highlighted that trends towards home / hybrid working and the roles of town, district and neighbourhood centres as well as village hubs for small scale employment activity must also be considered. Both Vistry Group and Stanton Cross Developments LLP considered that rather than de-allocating sites that have not come forward for development, the Strategic Plan review should instead allow for increased flexibility to enable existing allocations to incorporate other employment uses, where need is evidenced (e.g. Stanton Cross).
- 20.8 Associated British Foods, owner of "Land at Cockerell Road" allocated within the JCS, wished to ensure that the emerging planning policy framework adequately protects the site's future as a strategic employment allocation.

Question 21. Should new sites be identified for employment uses? If so, where and for what type of employment?



- 66 respondents said 'yes'
- 34 respondents said 'no'
- 1 respondent said 'maybe'

If so, where and for what type of employment?

- 21.1 Kettering Town Council stated that the approach needs to be evidence-led. Similarly, both Vistry Group and Stanton Cross Developments LLP commented that the Housing and Economic Needs Assessment (HENA) should consider whether further employment provision is required to meet the need arising in the area, and, if so, the type and scale of the employment uses required. They considered that the Strategic Plan must ensure that allocations are appropriately located so that they respond to a need for a particular use as close as possible to where they arise.
- 21.2 Respondents identified locations for new employment sites and other issues for consideration, including developers who specifically promoted sites for allocation in the Strategic Plan. These included:
 - Brownfield land should be prioritised before greenfield
 - Where there are already existing employment sites
 - Poor quality habitat space alongside the A14 and major roads
 - Town centres
 - Small units in rural areas
 - Need to provide local job opportunities
 - High tech industries and manufacturing
 - Sites should be suitable for green, sustainable jobs
 - Where they can be appropriately accommodated on the edge or near to existing settlements with good transport access.

- The location of new sites should be related to the quality of the roads and other infrastructure around the site.
- Building smarter and utilising space much more.
- 21.3 Cottingham Parish Council considered that no new sites should allocated unless there is an obvious desire to develop the site quickly, thus avoiding "sitting" on the site whilst it increases in value. They requested that applications for brownfield sites should have priority over those applications for green areas.
- 21.4 As discussed in Question 22, several logistics developers/site promoters responded to the consultation emphasising the demands and benefits of the logistics sector and that the Strategic Plan needs to fully reflect the role of logistics and to provide opportunities for meeting this sector of employment growth. They considered that the Strategic Plan should ensure that enough land is allocated to meet demand and that it provides the requisite land allocations to facilitate the growth of the logistics industry. Several logistics sites are promoted in consultation responses for future allocation in the Strategic Plan.
- 21.5 Tritax Symmetry suggested that new strategic employment sites need to be identified around the main growth areas with good transport accessibility. Logistics development should be a key consideration. It also considered that planning policies and decisions should recognise and address the specific locational requirements of different sectors. Similarly, Prologis robustly responded that new sites should be allocated in accessible locations that are both attractive and viable for the market.
- 21.6 Several respondents who answered 'no', notably residents and parish councils considered that as there is an over-supply of employment land additional sites should not be identified. The issue of needing to bring forward vacant sites and utilise existing sites/space before greenfield sites are identified was raised alongside the need to diversify the economy. A shortage of available labour was also highlighted as a reason for not identifying new employment sites.
- 21.7 Isham Neighbourhood Plan Steering Group and Isham Parish Council referred to the allocation of the 'Kettering South' site to the north of the village in the JCS (Policy 37). They considered this was allowed without the appropriate infrastructure and should not be an approach to development.

Officer response to Questions 19, 20 & 21

- 21.8 Planning policies and decisions should promote an effective use of land in meeting future needs, including the need for future employment provision. Local planning authorities should also take a proactive role in helping to bring forward land suitable for supporting economic growth.
- 21.9 The Council will continue to work with developers and relevant agencies, including exploring ways to secure funding for infrastructure and initiatives to unlock committed employment sites and ensure that the current employment plan allocations are delivered wherever possible.
- 21.10 The approach as to how best to meet the future employment needs in the Strategic Plan will comprise a key element of the spatial strategy and will be developed as the plan is progressed. It will be informed by the issues raised to this consultation, particularly in respect of the responses to Questions 9 &10, alongside the development of an evidence base, including the HENA and the Housing and Economic Land Availability Assessment (HELAA) which will provide a detailed assessment of committed employment sites that have not been brought forward. This work will allow the Council to be fully informed when making future decisions in respect of the ability of existing plan allocations to progress and contribute to meeting the Plan's identified employment needs in the Strategic Plan.
- 21.11 In relation to the Kettering North/Weekley Wood site, as previously mentioned, this site is allocated in the JCS. Policy 36: Land at Kettering North sets a range of criteria to guide the development of the site in assessing future planning applications. An application for part of the site has been submitted and will therefore be determined against the development plan and other material considerations as appropriate.

Question 22. How should the demand for logistics be addressed in the area?

- 22.1 92 respondents answered this question. There was a clear split between responses from the development industry and other respondents. Several responses from the development industry have promoted logistics sites for allocation in the Strategic Plan (See also Questions 20 and 21). In contrast, other respondents including residents, parish councils and some NNC Councillors expressed concerns about the amount of logistics that has been brought forward in North Northamptonshire and the impacts of existing sites on landscape, highways, communities, etc, alongside concerns about the future role of the sector and quantum of development.
- 22.2 Several respondents suggested that North Northamptonshire has taken too much logistics development/is focused too much on logistics and they do not want the area to be known as the national logistics capital. Pilton, Stoke Doyle & Wadenhoe Parish Council considered that "A better balance needs to be

struck between using the strategic location of N Northants to accommodate the expanding logistics industry and ensuring that this does not undermine the quality of life for local residents...Unless indiscriminate warehouse development is curtailed, climate change targets will continue to be eroded by increased air pollution, light pollution and carbon emissions".

- 22.3 Both Titchmarsh Parish Council and Save Titchmarsh and Upper Nene Valley Countryside & Habitats (STAUNCH) considered that the question presupposes that North Northamptonshire is an ideal place for large-scale logistics development, and that more development should be encouraged, and/or accommodated and they do not agree with this. Some respondents, including the CPRE suggested that future logistics development should be stopped/refused and that the demand should be spread elsewhere across the East Midlands.
- 22.4 Kettering Town Council stated that the approach to logistics should be evidence-led. Other respondents questioned the evidence of demand for logistics or suggested that current demand will be short-lived and that this should be reviewed regularly. One respondent recognised it is a complex question and that a taskforce should be established to scope the issueschanging habits/differing delivery mechanisms, etc.
- 22.5 Concern about vacant sites and the need to utilise these before bringing more sites forward, particularly speculative sites was highlighted in several responses as a key issue. A NNC Councillor suggested a better understanding of underused or unused employment space in the area was required, indicating that there are a considerable number of spaces available to rent. They also raised the potential to provide an increase in the height and density of units to reduce the overall land take.
- 22.6 Improving/investing in the road network capacity was highlighted in several responses, with concerns about the impact of HGVs raised. Isham Neighbourhood Plan Steering Group and Isham Parish Council flagged that logistics needs good transport access, and local communities should also be taken into account with regard to vehicle-based emissions and impact on the environment. They highlighted that the impact of the development north of Isham, which they considered has been devastating due to the lack of a bypass to the village. Weldon Parish Council stated that any logistics plans and assessments for road and other transport networks should be regularly reviewed. They suggested there is a perception that there is no transparency at present.
- 22.7 Other Concerns/issues frequently expressed included:
 - The need for better rail freight infrastructure, including needing to encourage use of rail freight.
 - The need for S106 contributions to go towards communities.
 - Need for a balanced economy in North Northamptonshire.
 - Logistics provides poorly paid, low-skilled jobs.
 - Labour shortage.

- Environmental impacts including on local residents, landscape impacts, etc.
- Loss of greenspace.
- The need to rebuild/repurpose existing sites.
- 22.8 In contrast, several logistics developers/site promoters responded to the consultation emphasising the benefits of the logistics sector and suggesting that the Strategic Plan needs to fully reflect the role of logistics and opportunities it provides. Developers all made the same point that the Strategic Plan should ensure that sufficient land is allocated to meet future demand and that it plans for and facilitates the growth of the logistics industry.
- 22.9 Responses from developers highlighted that the demand for logistics has changed significantly due to several factors, which has increased the demand for sites. Issues highlighted included significant growth in E-commerce which has been accelerated due to Covid, the impacts of BREXIT and the Covid pandemic. The significant increase in demand for larger units and a shortage of suitable sites was highlighted by developers.
- 22.10 Prologis set out that "Logistics is a fast-moving sector and one that has seen an unprecedented level of change and growth over the past 12 months or so. Anecdotal evidence from commercial agents suggests that in terms of trends, the industry is set to have progressed 5 years within the past 12 months. Whilst this has essentially been an expedited continuation of past trends, it has been accelerated by essential requirements of the pandemic and associated national lockdowns, Brexit and the rapid acceleration of the trend for e-commerce".
- 22.11 They strongly criticised the reference in the consultation document to North Northamptonshire having an over-supply of employment land and considered that this premise is founded on a flawed and out-of-date evidence base that would have wide-ranging consequences if uncorrected.
- 22.12 Developers highlighted that North Northamptonshire's location means it is well placed to respond to this demand with several referencing that it is within the 'Golden Triangle' of logistics. The A14 corridor was referenced in several responses and is where several sites are promoted, although sites have also been promoted on other roads within the area such as the A43, A45. Buccleuch stated that "North Northamptonshire sits at the very heart of the logistics golden triangle and this location presents an opportunity for the Council to deliver employment land that will contribute to local, regional and to some extent national needs".
- 22.13 Several sites are proposed for allocation in the Strategic Plan. Alongside need and demand, developers also highlighted national policy support, notably through the Planning Practice Guidance which now includes recently updated guidance specifically in relation to logistics development and recognises the particular set of requirements that such development gives rise to.

22.14 The 'National Policy Statement for networks' was highlighted by Tritax Symmetry, which states "This requires the logistics industry to develop new facilities that need to be located alongside the major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods. In addition, the nature of that commercial development is such that some degree of flexibility is needed when schemes are being developed, in order to allow the development to respond to market requirements as they arise."

Officer response

- 22.15 The approach to logistics will be a key issue for the Strategic Plan and this will be informed by evidence including the recently published SEMLEP logistics study¹, and the Housing and Economic Needs Assessment and Housing and Economic Land Availability Assessment, as well as taking into account any supply that may come forward through future planning applications.
- 22.16 It is recognised that there is strong demand for logistics floorspace nationally and across the SEMLEP area, which is highlighted in the SEMLEP study, alongside a supportive national policy context. The national context for this demand needs to be recognised, as well as the locational advantages of North Northamptonshire through its good connections. It is clear from responses to this consultation and Call for Sites submissions that there is significant developer interest in bringing forward sites in North Northamptonshire.
- 22.17 It is also recognised that planning policies should help to create the conditions in which businesses can invest, expand, and adapt. Central Government policy states that significant weight is to be placed on supporting economic growth, taking into account both local business needs and wider opportunities for development. Therefore, a clear economic vision and strategy will need to inform the policy direction of the Strategic Plan.
- 22.18 However, North Northamptonshire's contribution to meeting the level of wider, future demand should not be at the cost of good place-making nor without the appropriate level of mitigation, including the need to satisfactorily address infrastructure provision. Managing this demand appropriately will be fundamental to the policy aims of the Strategic Plan in providing a balanced economic strategy.
- 22.19 The existing supply of employment land will need to be carefully assessed to see how, or whether, it can meet the demand for logistics. The capacity of existing infrastructure and the ability for any improvements to be delivered will also be critical to being able to meet demand and this needs to be balanced against environmental considerations.

¹ Warehousing and Logistics in the South East Midlands, Iceni Projects Limited on behalf of South East Midlands Local Economic Partnership September 2022

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- 22.20 The SEMLEP study sets out a range of scenarios on potential future demand across the SEMLEP area in the periods 2021-30, 2021-2040 and 2021-2050 along with an assessment of supply. It provides recommendations on how to manage this demand collaboratively across the study area and highlights the benefits of working collaboratively and being able to demonstrate collective working to ensure that no individual authorities or Local Plans are subverted through high levels of pressure for development. Officers will continue to work with SEMLEP and neighbouring authorities to seek to develop this collaborative approach as much as possible. The SEMLEP study also sets out locational guidance, including criteria to help guide site assessment and identification which can inform the approach.
- 22.21 It will be essential that the approach in the Strategic Plan seeks to maximise benefits and opportunities for the area by ensuring that logistics development is appropriately located, sustainable for the lifetime of the development and delivers significant benefits, whilst minimising and mitigating impacts, including any cumulative impacts. This will be addressed through the assessment and allocation of sites and delivered through setting out a clear policy direction through the Strategic Plan.

Question 23. How can the Strategic Plan deliver high quality, better skilled jobs?

- 23.1 104 respondents answered the question. The need to diversify the economy featured significantly in responses, with several responses from residents stating the need to move away from a focus on warehouses and seeking limits on future growth of this sector.
- 23.2 Isham Neighbourhood Plan Steering Group and Isham Parish Council considered that the Plan and its evidence base needs to consider how best to capitalise on the opportunities the Arc presents. As part of this they suggested the Council should work with Local Enterprise Partnerships who have developed local Industrial Strategies to identify local economic strengths, challenges and opportunities and the actions needed to boost productivity, earning powers and competitiveness in the area to unlock economic potential. Similarly, Weldon Parish Council stated there needs to be a strategy to attract the diverse high quality employment opportunities to complement the residential evolving communities. They suggest the council engage with the ARC to establish what would be an attractive proposition for high-tech businesses
- 23.3 Other responses identified sectors that the plan should seek to encourage and issues that should be addressed. Incentives to employers who will provide the type of jobs targets was highlighted. More investment into towns was flagged alongside looking at developing empty properties and making the local area more attractive and appealing in general to encourage businesses to the area. The provision of smaller sector units for high tech and

- manufacturing Small and Medium Size Enterprises would bring better quality jobs to the area was raised.
- 23.4 Encouraging green energy start-ups/manufacturing, Research and Development companies was suggested. One respondent stated that a wind turbine manufacturing hub should be developed, positioned along the A14 which would be fantastic for the region for employment, education, trade and climate goals. Another respondent commented that North Northants also has good catering, events and arts/music skills which should be further developed.
- 23.5 Hanwood Park LLP referenced wider key considerations beyond the quality and quantity of employment land provision. They highlighted that quality of place and of the housing offer can influence business location decisions and therefore policies on housing mix may need to consider how the offer can be responsive to supporting North Northamptonshire as an attractive location for business. They also suggested that part of the strategy could also include a key principle for the housing offer to integrate home offices within the mixes and types of housing to be planned for.
- 23.6 Developers promoting logistics sites emphasised the benefits of the sector and opportunities it provides. These responses set out that the logistics sector is a key employer nationally and provides a wide array of jobs at various skill levels in both warehouse and office environments. They highlighted that whilst traditional warehouse roles are common, logistics activities also offer and increasingly require positions in higher skilled roles. Prologis commented that the logistics sector is often mistakenly believed to only provide low skilled, basic jobs and is often associated with zero hours contracts. However, they considered that this is a wholly inaccurate assessment.
- 23.7 Tritax Symmetry suggested that the plan needs to allocate sufficient land, in the right locations, of the right size, to enable the market to respond. They considered that the local plan cannot distinguish other than between use classes and should appreciate the range of skilled jobs provided within different use classes.
- 23.8 Several respondents referenced education and skills as being a critical issue. Some respondents suggested that more apprenticeships/schemes need to be developed for better training and the council could work more closely with industry and local colleges. Similarly, working to encourage a university or Higher Education institution specialising in tech/green and sustainable skills was highlighted, alongside giving a greater profile to Northampton University and Higher Education across the board. Looking for linkups with Oxford and Cambridge Universities to maximise the position in the Arc was suggested.

Question 24. How can the Strategic Plan help to address skills shortages and promote better training and further and higher education opportunities?

- 24.1 70 respondents answered the question and several responses crossreferenced to responses to question 23 or raised the same issues.
- 24.2 The need for better education provision was raised by several respondents, including better education and range of Further Education (FE) facilities in market towns and locating and funding a Higher Education Network (HEN). The need to link up with other Universities and Colleges was highlighted and Northampton College, Leicester University were flagged alongside looking for link-ups with Oxford and Cambridge Universities to maximise the position in the Arc. Strengthening the role of Tresham College was raised by respondents including Irthlingborough Town Council, Persimmon and CPRE Northamptonshire who considered its facilities should be developed as a Regional Technical College.
- 24.3 Several respondents referenced the need to identify the current skills shortage. Working more closely with business and educational facilities including local Universities to identify skill gaps and create space for training centres and Small and Medium-sized Enterprises (SMEs) was highlighted. One respondent suggested consulting with Oxford and Cambridge universities to see where they are struggling, what issues they have with attracting people, and then address those needs. Cottingham Parish Council suggested that the local FE College and employment agencies will have the best idea of where there are skills shortages. They noted that there are an apparent lack of skilled plumbers, electricians and home repair workers (roofers etc).
- 24.4 Apprenticeships were highlighted as a key issue and that more apprenticeships /schemes need to be developed for better training. Cottingham Parish Council stated that this should always be a consideration when large projects are being undertaken, e.g. construction, as part of a contract, providers are made to employ local young people as apprentices. Encouraging apprenticeships perhaps by giving some incentive to companies who offer those training opportunities or access to land identified for high skill employment was also suggested.
- 24.5 Encouraging the development of green employment was raised, including working to encourage a University or Higher Education institution specialising in tech/green and sustainable skills. One respondent suggested training should favour Science Technology Engineering and Maths (STEM) subjects which are needed to meet the change to a net-zero carbon economy.
- 24.6 Several developers such as IM Properties considered that skills shortages and opportunities can be addressed through encouraging inward investment and economic growth via the allocation of sufficient employment sites within the plan. They flagged that businesses and employers make a significant contribution to the provision of apprenticeships, skills and training. Reliance should not be placed on the public sector to provide all education, skills and

- training opportunities. Similarly, Miller Homes & Central England Co-Operative stated that the Strategic Plan should look to new strategic site allocations where the opportunity to support skills and education can be realised. "This would include, for example, the allocation of Land North of Raunds, which is capable of delivering 17ha of strategic employment on land adjoining the A45, as well as a new 2FE Primary School."
- 24.7 Mulberry and Mulberry Commercial referenced supporting education and industry links through the provision of facilities and infrastructure. They also noted that s.106 planning obligations can also be used to secure training and upskilling.
- 24.8 Prologis highlighted that the logistics sector can make a significant contribution to addressing skills shortages and promoting better training and further higher education opportunities. They referenced the Hub at Daventry International Rail Freight Terminal that they consider a trailblazing project in its approach to assisting companies to find the talent they need via the delivery of the Prologis Warehouse and Logistics Training Programme (PWLTP). Prologis has plans to extend the PWLTP across its network of Prologis Parks and considered that land north of the A43 (at Kettering which they are promoting as an allocation for logistics) would be well placed to facilitate a new Hub facility as part of a high-quality sustainable warehouse and logistics development.

Officer response to Questions 23 & 24

- 24.9 The Strategic Plan will set out an economic vision and strategy to strengthen and diversify the economy. Existing sectoral strengths, opportunities provided by the Oxford-Cambridge Arc and implications arising from the Covid-19 pandemic including changes to working patterns will be important considerations.
- 24.10 The employment strategy in the Strategic Plan will be a key element of the spatial strategy and will be developed as the plan is progressed. The approach will be informed by issues discussed in response to questions 9 & 10, responses raised in this consultation alongside evidence including the Housing and Economic Needs Assessment. It will be important to engage with SEMLEP and other agencies as appropriate when developing the approach.
- 24.11 A key challenge for the Strategic Plan will be to deliver higher-value, higher skilled employment and routes into such employment. Against the backdrop of the Oxford-Cambridge Arc and national Industrial Strategy, significant opportunities exist to achieve a step change in the area's commercial property market performance, if suitable infrastructure and sites can be provided to attract and grow high value, innovative business activity to complement ongoing population and housing growth. This will also require provision of sufficient skilled training facilities and resources, enterprise support and Research & Development through links to universities, further education.

24.12 A key element in delivering higher value jobs relates to skills and this is a key priority within the Corporate Plan. This includes supporting key sectors such as construction and renewable energy. It is evident that the Strategic Plan forms one mechanism for addressing skills shortages across North Northamptonshire and whilst some of the issues raised in responses fall outside the scope of the Strategic Plan, they raise important issues to take forward.

Question 25. How should the Strategic Plan encourage appropriate tourism opportunities?

- 70 respondents answered the question. The need for better infrastructure, including better public transport connections to sites, featured in several responses alongside the need for more visitor accommodation, including Hotels, B&Bs, etc. Higham Ferrers Town Council stated that "With the right infrastructure, services and facilities in place people will be able to better access places of interest and historic towns. Connectivity between town centres and out of town shopping centres is vital". Oundle Town Council suggested the Strategic Plan should include policies to increase the availability of hotel and other tourist accommodation in towns such as Oundle or its immediate vicinity and include policies which will produce additional or enhanced recreational facilities in towns such as Oundle. Creating better places including town centre regeneration was also flagged with one respondent referencing the former Corby enterprise zone and questioning whether similar funding could be made available as part of levelling up.
- 25.2 Hanwood Park LLP highlighted 3 specific elements of the Strategic Plan that will encourage appropriate tourism opportunities. Town centres: emphasis should be on diversification but more focus should be placed on services to draw footfall back into centres. Place-making and sustainable development: through good design improving the quality of place to improve the image and perception of North Northants attracting visitors to the settlements and countryside of North Northants. Natural and Historic Environment: attractive and accessible green infrastructure and protected and enhanced historic assets, that support the image and perception of North Northants.
- 25.3 Several respondents highlighted that the impact of development affects tourism and that to encourage tourism opportunities the rural character of North Northamptonshire and the setting of assets needs to be preserved. The impact of warehouse development on the area's character and loss of green space/woodland was frequently raised, particularly by residents as well as Titchmarsh Parish Council and Save Titchmarsh and Upper Nene Valley Countryside and Habitats (STAUNCH). CPRE highlighted the need to identify and protect current attractions and their settings and ensuring that other policies do not lead to the destruction of assets which tourists come to explore. Pilton, Stoke Doyle & Wadenhoe Parish Council also referenced protection and stated "Through making sure that the historic, cultural and environmental assets of N Northants are adequately protected so that tourists will want to come and enjoy the cultural and wildlife heritage of the area,

including its historic architecture, buildings and monuments". Oundle Town Council considered the Strategic Plan should include policies to preserve the qualities of towns such as Oundle which make them attractive destinations for tourism.

- 25.4 Several respondents highlighted North Northamptonshire's existing assets, including the Upper Nene Valley Gravel Pits, which some felt should be made an Area of Outstanding Natural Beauty (AONB). Both STAUNCH and Titchmarsh Parish Council considered that the creation of an AONB in the Upper Nene Valley would help provide a focus for leisure and tourism opportunities. However, Natural England wished to note the need to address potential impacts that tourism could have on the Upper Nene Valley Gravel Pits Special Protection Area (SPA), namely recreational disturbance by increased footfall. They stated that North Northamptonshire Council must ensure that tourism does not impact on the site integrity of Upper Nene Valley Gravel Pits SPA.
- 25.5 Several site promoters considered that the Strategic Plan could encourage appropriate tourism opportunities by enabling a more flexible and commercial approach to the diversification of the rural environment.
- 25.6 In contrast, a couple of respondents raised concerns about the negative impacts of tourism, with one commenting that they didn't want tourism in the area as it will push up housing costs, create low level, poorly paid jobs and lead to congestion "Don't want to be like the Cotswolds".
- 25.7 Some respondents raised issues that are outside the scope of the Strategic Plan but will be important for the council to consider including:
 - Better advertising
 - Better use of NNC website to promote the area/promote assets. A NNC Councillor noted that "There is very little publicity for special events organised by our parishes and town councils. NNC should support those events with publicity".
 - Free parking
 - Better, cheaper or even free access to local historic and stately homes and grounds
 - Grants/subsidies to support venues
 - The need to establish a unitary tourism board to coordinate across the area.

Officer response

- 25.8 Encouraging sustainable tourism opportunities in North Northamptonshire will require a variety of delivery mechanisms of which the Strategic Plan is one.
- 25.9 The employment strategy in the Strategic Plan will be developed as the plan is progressed and will be informed by responses raised in this consultation

- alongside evidence including the Housing and Economic Needs Assessment. It will be important to engage with SEMLEP and other agencies as appropriate when developing the approach.
- 25.10 It will be essential that a balanced approach is taken forward which balances tourism opportunities against infrastructure capacity, environmental impacts, etc. As set out by Natural England, the approach must ensure that tourism does not impact on the site integrity of the SPA. Evidence has been commissioned to inform the approach to the SPA, including recreational impact and the mitigation measures that will be needed.

Town Centres

Question 26. How can the Strategic Plan support town centres so they continue to act as the heart of their communities?

- 26.1 91 respondents provided an answer to this question. Some respondents wanted a return to big stores, but many others recognised town centres have changed and there is a need to reimagine and adapt to respond to the modern world. A broad range of mainly positive suggestions were put forward.
- 26.2 Some respondents highlighted the need to listen to the community and understand what would attract people to return to town centres. Others suggested better working relationships with civic organisations, including town councils.
- 26.3 Many respondents, including CPRE and some town and parish councils, focused on regeneration and making use of redundant buildings and brownfield land/committing to compulsory purchase of sites/seeking grants and support from central government for urban regeneration.
- 26.4 Kettering Town Council, Broughton Parish Council, Persimmon Homes North Midlands, and others suggested flexibility to allow retail provision to contract and enable town centres to diversify. A range of measures to allow town centres to diversify were suggested in responses.
- 26.5 Support for more residential, particularly in mixed use schemes with residential above commercial units featured in several responses. One respondent commented that policies should ensure high quality accommodation. North Northamptonshire Council's Education Service highlighted the impact of increased residential development on infrastructure and services and the need to identify issues as early as possible. A NNC Councillor suggested flats in town centres should be discouraged unless they provide adequate parking.
- 26.6 Support for leisure/entertainment facilities and experienced based activities was highlighted by respondents, examples included cinemas, musical or

- theatre venues, hotels, concert halls, sports clubs, games bars, escape rooms, electric darts, pop-up events, and places to learn new skills and work.
- 26.7 Creating improved retail facilities/shopping experience was highlighted, examples included workshops, art and craft spaces, niche retail area for food and eating, encouragement of small independent shops, and regular markets, especially those selling local produce.
- 26.8 The need to improve transport/improved transport links to town centres was raised by many respondents, including integrated public transport and active travel.
- 26.9 Car parking was a key issue raised by a significant number of respondents with many suggesting that parking facilities should be cheaper or free. It was emphasised by some that car use will continue and adequate access and car parking should be provided, especially for residential developments.

 Cottingham Parish Council suggested the provision of re-charging points.
- 26.10 Many respondents suggested flexibility in rents and business rates to encourage greater occupancy and support new enterprises and small and independent businesses. Other examples of support highlighted included creation of click and collect facilities, provision of short leases, creation of accessible and well-advertised websites, publicity campaigns, and support for co-working spaces.
- 26.11 Some respondents suggested permission for expansion of out-of-town development is constrained and future investment is focused on town centres. In contrast, Hampton Brook suggested that some uses are not suitable for central locations and suggested that land is allocated to meet the demand for food stores.
- 26.12 Improving the environment to create a better place to visit/improve viability was highlighted. Suggestions included the creation of pedestrian-friendly environments, provision of flower beds, trees and green space, crime reduction, protection of the historic environment, support for good design incorporating the principles of Secured by Design (by Northants Police, Northants Fire and Rescue and and Office of Police, Fire & Crime Commissioner), and support for additional cleaning, including litter collection and removal of graffiti. Natural England welcomed any opportunities to include Green and Blue Infrastructure in any of the town centres. The Environment Agency suggested updates to evidence on flooding.

Question 27. What should the future role of Rushden Lakes and other out-of-centre locations be?

- 27.1 61 respondents provided an answer to this question. Many respondents commented that the role of Rushden Lakes and out of centre developments should be limited to maintaining their current scale and role. Several respondents argued that the priority for investment should be town centres and better regeneration. Detrimental impacts on existing town centres and traffic creation/congestion were some of the reasons provided including from Kettering Town Council who stated "Rushden Lakes has contributed to the decline of town centres throughout North Northamptonshire. Extending it further and diversifying its offer will only worsen the condition of town centres".
- 27.2 Other respondents recognised the established role of Rushden Lakes and out of centre developments. Comments acknowledged the contribution of Rushden Lakes to the local economy and the leisure and tourist offer as well as the provision of major retailers and services unavailable in town centres and employment opportunities. Wellingborough Town Council commented that Rushden Lakes has been good for employment and shops in the Wellingborough area. They see it as an important place for economy and want to see the continued success and work together. They also highlighted that there needs to be some provision for links to get to Rushden Lakes from Wellingborough and back.
- 27.3 Comments from the Crown Estate outlined what they considered as the benefits of Rushden Lakes, including improved consumer choice and more sustainable shopping and leisure trips as well as helping to claw back some leakage of shoppers and expenditure to other towns further afield. They suggested that the role and function of Rushden Lakes is maintained and improved in the Strategic Plan with recognition as part of the wider town centre network and specific policy framework to support diversification
- 27.4 Some respondents referenced the different role and offer between town centres and out-of-town developments and highlighted opportunities to coexist and prosper. One respondent suggested that out of centre developments are as essential as town centres, especially with town centres facing decline. Hampton Brook suggested that some uses are not suitable for central location and suggested that land is allocated to meet the demand for food stores.
- 27.5 Respondents made other suggestions to improve or reduce the impact of Rushden Lakes and other out-of-centre locations. Several of these comments related to Rushden Lakes.
- 27.6 Some respondents suggested improved accessibility and connectivity including public transport in relation to out-of-centre locations in general. Specific connectivity improvements to Rushden Lakes included suggestions such as Park and Ride, shuttle bus, cycle paths, river boat, enhancing the Greenway and improvements to the roundabout access on the A45. Pilton,

- Stoke Doyle and Wadenhoe Parish Council suggested that a charge for car parking at Rushden Lakes would decrease car traffic as well as support public transport services.
- 27.7 A NNC Councillor suggested more activities and diversity of activities at Rushden Lakes as well as improved bus services to it to make it feel more accessible. Higham Town Council suggested collaborative working with town councils and businesses to encourage people to visit the local towns and surrounding area.
- 27.8 Newlands Developments recognised that the success of Rushden Lakes has added pressure to the capacity of the highway network and promoted a strategic employment site at Rushden which it suggested could address existing and anticipated problems, including the local highway infrastructure.

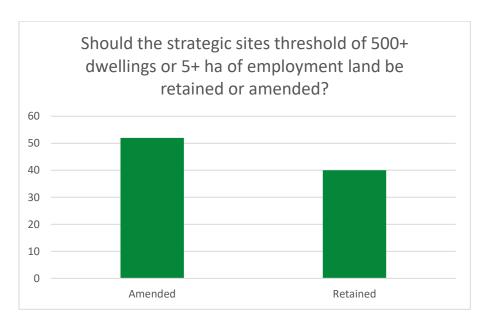
Officer response to Questions 26 & 27

- 27.9 The Corporate Plan sets out that the Council will reimagine and redesign key town centres to help respond to changing trends in shopping, leisure and living, with developed masterplans and identification of opportunities for public realm improvements.
- 27.10 The Strategic Plan will provide updated policy guidance and strategy for town centres and retail development taking account of the impact of policy changes and social/economic implications including Covid-19. This will include a review of comparison floorspace requirements. It will be necessary to think about how the Council will reimagine and redesign key town centres and how the Strategic Plan can support regeneration and economic recovery from Covid 19 as well as ensure that town centres play a role in helping to address the climate emergency, meet housing needs, provide necessary services and facilities, and support people's health and wellbeing.
- 27.11 The Strategic Plan will need to consider the future role of out-of-centre locations as part of the retail strategy, which will be strongly influenced by the spatial strategy of the plan. There was a divide in the comments on the future role for Rushden Lakes and other out-of-centre locations.
- 27.12 In considering the future role of Rushden Lakes its relationship to the Upper Nene Valley Gravel Pits Special Protection Area will be fundamental, as will local infrastructure capacity and the potential for sustainable transport links.
- 27.13 The responses highlight the challenges facing town centres and the need for robust and up-to-date evidence to inform the approach in the Strategic Plan. The council commissioned Nexus Planning in May 2022 to prepare a 2022 North Northamptonshire Retail Capacity Update that will provide updated evidence for the drafting of the Strategic Plan and support the development of town centre strategies.

27.14 Some of the suggestions made in relation to Question 26 fall outside the scope of the Strategic Plan but can be taken forward by relevant services within the Council.

Strategic development locations and opportunities

Question 28. Should the strategic sites threshold of 500+ dwellings or 5+ ha of employment land be retained or amended? Please provide reasons for amendments.



- 40 respondents said that the threshold should be retained
- 52 respondents said that the threshold should be amended
- 28.1 Respondents who supported retaining the threshold including the Home Builders Federation (HBF) and several developers, considered that the threshold is reasonable. Miller Homes stated that this threshold has already been tested through the examination of the adopted Joint Core Strategy (JCS) and was concluded to be sound by an independent Inspector.
- 28.2 Both the Drayton Estate and St Modwen Logistics suggested that the assessment of potential employment sites takes into account the emerging focus at the sub-regional level on larger, strategic sites as part of the overall mix of sites identified in the Strategic Plan.

Please provide reasons for amendments

28.3 Some residents considered that the Strategic Plan should focus on making use of existing empty buildings and brownfield sites. Some responses highlighted concerns with larger sites including a lack of infrastructure

- provision. One respondent considered that the bigger sites are characterless with no shops, pubs, few schools.
- 28.4 Respondents who sought amendments, including some residents and several developers predominantly suggested that the site threshold should be reduced and that the Strategic Plan needs to allocate a mix of sites in a range of locations. This links to the issues raised in relation to the future spatial strategy of the Strategic Plan (Questions 9&10). Several responses highlighted the time taken for the Garden Communities (Sustainable Urban Extensions (SUEs)) to come forward and that smaller sites would deliver more quickly. Responses set out that reducing the site threshold could help to ensure that a diverse mix of additional sites could be allocated without having to rely on subsequent 'Part 2' plans. Such responses considered this could help to expedite delivery and the ability to maintain a deliverable 5-year housing land supply. Taylor Wimpey and other respondents considered that inclusion of more sites below 500 dwellings would help to support the robustness of the supply and delivery of homes and discourage over reliance on large sites which may require substantial new infrastructure to facilitate development.
- 28.5 Several respondents, particularly developers/site promoters considered that the site threshold will depend in part on the size of the settlement it is located at and that what constitutes "strategic sites" should not be understood on a single basis across the entire plan area as it is a relative term. Ecton Parish Council suggested that this policy should be relevant to the location. "For example, brownfield sites are by nature smaller however they should be considered strategic". Taylor Wimpey highlighted that a site of 400 dwellings in a Market Town will ultimately be strategic in its scale and in the context of the settlement, requiring consideration of the impact of development on the strategic infrastructure, services and facilities in the town, whereas this would be a modest development in an urban area such as Kettering.
- 28.6 Both Vistry Group and Stanton Cross Developments LLP noted that whilst the threshold used in the JCS is a sensible starting point, sites that fall under this threshold that are located within or immediately adjacent to the strategic allocations/SUEs that are already committed (for example through the JCS) should be considered by the Strategic Plans. They considered that those sites will enhance the use of existing strategic development locations by maximising the use of the infrastructure that has been delivered as part of those developments and will also ensure that they are developed to their full and logical extents.
- 28.7 Suggestions for amendments to the site threshold varied and included:
 - Development being limited to 250 dwellings and 3ha of employment land.
 - Reduced to 200 dwellings.
 - Reduced to 250 dwellings.
 - Consider including more sites of less than 500 dwellings.
 - Minimum threshold of 75 dwellings.

- Lowered or the inclusion of a policy providing flexibility for the delivery of sustainable sites adjoining the boundaries of sustainable settlements.
- Developments in excess of 100 houses.
- Amended to 'around 500 units' and treated flexibly for the purposes of site selection.
- Housing sites- amend from 500+ to 200+ dwellings, 50+ in villages. Set indicative targets for all categories of settlement. Employment sites 5+ ha.
- Threshold for employment land should be retained, housing threshold lowered to about 100 units (or 50 units in sensitive locations).
- Amend to "and/or".

Officer response

28.8 It will be important to recognise that the scope of the Strategic Plan is focused on strategic issues. At this stage it is not possible to determine whether the strategic sites threshold should be amended as this will be influenced by the spatial strategy of the plan. As set out in responses, what constitutes a strategic site could vary depending on the settlement in which it is located. It may, therefore, be appropriate to consider revising the threshold by settlement should any changes be made to the spatial strategy.

Infrastructure

Question 29. What are the key infrastructure priorities that need to be delivered in North Northamptonshire and how can they be best be delivered?

- 29.1 108 respondents provided feedback. Responses identified an extensive range of infrastructure priorities for North Northamptonshire across a range of typologies. However, within the responses it was apparent that certain types of infrastructure were highlighted more than others, notably transport-related infrastructure.
- 29.2 Road infrastructure featured in several responses from a range of respondents including town and parish councils. This included not only the need for maintenance of existing roads, but new projects to improve certain junctions and parts of the highway network in North Northamptonshire to enhance their capacity for growth. Several responses referenced schemes highlighted in the North Northamptonshire Investment Framework and improvements to the A14, A43 and A45 corridors. Specific road schemes that were highlighted as priorities by respondents included:
 - Improving existing roads rather than building new
 - Dualling of the A45 between Stanwick-Thrapston /A14 Junction
 - Junction 10a A14 and Weekley Warkton Avenue

- The off-site highway improvements required as a result of the East Kettering SUE
- A new roundabout on Gypsy Lane and Rothwell Rd junction in Kettering
- Highway improvements in Kettering Town Centre
- Dualling A43
- Improvement of A605
- 29.3 In addition, a number of responses indicated the need for improvements to other types of transport infrastructure such as walking and cycling in particular with an emphasis on reducing carbon emissions and a shift away from the dominant use of the car. Several responses highlighted that there also needs to be improvements to public transport services such as the railway and buses.
- 29.4 The emphasis provided by these responses makes it evident that the overall theme of connectivity provided through transport infrastructure is key in North Northamptonshire. Digital connectivity through better broadband provision, including allowing people to work from home was also raised by several respondents.
- 29.5 Whilst infrastructure to enhance connectivity featured in most of the responses, several other infrastructure types were highlighted as needing improvement.
- 29.6 Education, through the provision of both primary and secondary schools in the area was raised in several responses. The Council's education department highlighted that provision of land and funding towards delivery of education infrastructure remains a priority for the Council, to ensure that it is able to meet its statutory duty to provide a sufficient supply of places for the children of school age residing in the area. The response also highlighted that whilst education infrastructure can often be delivered onsite where of sufficient scale (particularly primary education), the plan will need to take a strategic approach to identifying where this may not be the case (Secondary education where a single development site may not be of the scale to provide full land/financial contributions to deliver a new school). Responses also highlighted that there needs to an additional focus on further and vocational education to provide additional opportunities beyond mandatory education.
- 29.7 Healthcare was also identified as a focus of future infrastructure provision in North Northamptonshire. Many of the issues related to a need for increased capacity through the provision of improved or new hospital provision and dental facilities. NHS Property considered that "NHS land and property should be able to grow and expand on existing NHS sites and on land across the borough unhindered. Policies should support the delivery of public service improvements as quickly as possible and allow for adaption to meet changing needs for health buildings". They commented that in areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services in order to meet growing demand. They requested that when setting planning obligation policies, the

- Council seeks to address strategic as well as local priorities in planning obligations and engage the NHS in the process as early as possible.
- 29.8 Leisure facilities including swimming pools and libraries were also mentioned. Kettering Amateur Swimming Club highlighted the need to improve Kettering Swimming Pool, which they consider is inadequate and needs improvement. Northamptonshire FA highlighted that NNC needs to ensure that developers are pushed fully to provide suitable facilities to cater for the football growth that new housing brings.
- 29.9 There was also a small mention of the need to provide open space facilities as well as green infrastructure provision. Natural England would like to see a connected, high-quality network of multifunctional Green & Blue Infrastructure (GBI) for people and nature. They considered this can be achieved by ensuring high quality and the right quantity of GBI is delivered across all new developments and would like to see the new Green Infrastructure (GI) Framework embedded in the Strategic Plan. They commented that the GI Framework and Standards could help develop benchmarks and standards for the North Northamptonshire Strategic Plan.
- 29.10 Some respondents, notably statutory agencies referenced the evidence that should be commissioned to inform the Strategic Plan. National Highways acknowledged that the Strategic Plan will consider the cumulative impacts of development and identify any possible mitigation measures and welcomed this. They would require any potential sites identified through the Local Plan which could have an impact on the Strategic Road Network in the area, to be subject to individual or cumulative assessments in accordance with the DfT's Circular 02/2013.
- 29.11 The Environment Agency (EA) stated that the Infrastructure Delivery Plan which included Glendon Hall Flood Storage Reservoir, and several other flood risk schemes should be revisited to determine if these schemes are still appropriate based on the expected scale of development in these locations, and if so, they should be included within the key infrastructure priorities to be delivered. They flagged good water sewage infrastructure for new housing development and working with water companies and the EA to identify where the sewage network may have problems to resolve. The EA considered that infrastructure solutions should aim to deliver multi-functional benefits. For example, road enhancements that also deliver flood storage and carbon sequestration opportunities or new rail links where the sidings can be used to generate solar power or act as wildlife refuges.
- 29.12 Historic England highlighted that there are a number of places where the additional HGV traffic created by logistics developments has had an impact as it passes through sensitive historic environments, for example the additional HGV traffic going through Isham village which impacts on Isham Conservation Area and the Grade II* listed St Peter's Church. It considered that priorities for new infrastructure should be strategically tied into allocations for new employment/logistics sites, and careful advanced consideration of heritage impacts to heritage assets and their settings should be carried out.

Officer response

- 29.13 The infrastructure priorities identified in responses will inform the development of the Strategic Plan. It is noted that several of the identified projects are longstanding projects that are identified in the Joint Core Strategy (JCS) and other documents. The Strategic Plan will need to consider the cumulative impacts of development and identify the key infrastructure required to deliver the strategy such as strategic transport schemes, utility networks, green infrastructure and community facilities including schools. The Corporate Plan sets out that providing a range of accessible leisure, sports and play facilities and attractive open spaces will be important in helping people to live active, fulfilled lives.
- 29.14 The approach will be informed by a refresh of the infrastructure evidence base, including updated transport modelling work at relevant stages to test the distribution of development and ensure that all forms of movement infrastructure are identified and planned for. The Council will work with infrastructure providers and statutory agencies to ensure that the approach in the Strategic Plan is robust, sustainable, and deliverable.
- 29.15 An important principle in the JCS that will be taken forward in the Strategic Plan is that new development should be located and designed to minimise its demand on infrastructure, and that any additional impacts arising because of development can be effectively mitigated through delivery of new or expanded, high quality infrastructure. The design, layout and location of development can minimise the need for or make more efficient use of some items of infrastructure. Where there is a need related to new developments then contributions towards its delivery will be secured from the development. The Strategic Plan will need to consider the mechanisms for funding and delivering infrastructure and demonstrate that its proposals can be delivered.

Place-making/sustainable development

Question 30. Does the consultation document identify the correct placemaking principles for the Strategic Plan or are there any others that need to be considered?

30.1 60 respondents provided feedback. Overall, the principles were broadly supported with most respondents including several developers and the Home Builders Federation, considering the principles identified in the document to be suitable. As discussed below, some of these responses raised concerns about the viability impacts of some of the measures referenced in the principles. Gretton Parish Council noted the heavy dependency on other NNC policies and that joined-up thinking is key.

- 30.2 There were a very small number of respondents who did not agree with the suitability of these principles. Both Titchmarsh Parish Council and Save Titchmarsh and Upper Nene Valley Countryside & Habitats (STAUNCH) welcomed the goals in the document but considered that the principles were generic and do not apply to local circumstances. Other respondents who answered 'no' did not provide reasons for their response.
- 30.3 Historic England noted that Heritage is not included, and that it should be to meet the requirements of the National Planning Policy Framework, to encourage sense of place and connection to surroundings, and tourism and opportunities to preserve and enhance the historic environment.
- 30.4 Several respondents, although broadly supportive of the proposed principles suggested amendments. These are summarised below and have been separated under the headings for the place-making principles in the document, although suggested amendments are often relevant to multiple principles.

1. Active, inclusive, and safe

- 30.5 Although there were only a limited number of comments that referred to this principle, it was evident from responses that the younger and poorer population need to be considered as well as those the rural communities. The latter also links to principle 4.
- 30.6 NHS Property Services noted there is a well-established connection between planning and health. Planning policies can not only facilitate improvements to health infrastructure, but also provide a mechanism to improve people's health. They requested that the Local Plan includes policies for health and wellbeing which reflect the wider determinants of health and promote healthy and green lifestyle choices through well designed places. Sport England stated that its Active Design Guidance should be embedded in the Strategic Plan.

2. Environmentally sensitive

30.7 The emphasis in responses were primarily focused on the need to reinforce and strengthen policies that deal with environmental sensitivity and ensure that other policies do not override this. Responses also highlighted the need to consider natural capital, net environmental gain, biodiversity net gain and resource efficiency measures. The Environment Agency suggested that the principle should be broadened to better reflect the aspirations of the 25 Year Environment Plan to ensure the Arc is `more sustainable, beautiful and green' and the Arc Environmental Principles. They suggested it include reference to natural capital, net environmental gain, biodiversity net gain and resource efficiency measures. Natural England would like to see an explicit statement of respecting the sensitivity of the Upper Nene Valley Gravel Pits Special Protection Area in point 2 on environmental sensitivity.

3. Well designed and built

- 30.8 Most of the comments received focused on this principle. Significant reference was made to existing design guidance in the form of the National Design Guide, the National Model Design Code 2021, and Building for a Healthy Life. It was emphasised by developers that locally set principles need to be in accordance with these and should not affect viability and delivery of housing by setting out additional policy requirements.
- 30.9 The need to consider crime as an important factor in development layout and design was also raised by Northants Police, Northants Fire and Rescue and Office of Police, Fire & Crime Commissioner who emphasised the need to follow the principles of Secured by Design. This is because design and good planning can prevent ill health, pollution, road injuries, worklessness, poor housing and perception of crime. The importance of easy access to open space also needs to be considered.
- 30.10 Prologis referenced their site being promoted on land north of the A43 at Kettering and the PARKlife concept on which it would be based. The fundamental principles of which are sustainability, health and wellbeing in the design, delivery, and operation of its developments.

4. Well connected

30.11 There were limited comments on this principle, however, the responses did highlight the need for good connectivity and a high-quality environment to attract the aspirational population to the area.

5. Thriving Community/offer

30.12 Limited reference to this principle within responses.

7. Future proofed

30.13 Again, there were limited comments relating to this principle. However, those comments received were largely from developers and focused on the climate change resilience measures identified. Responses from some developers set out concerns about the viability impacts of local measures going beyond measures they feel are sufficiently addressed through building regulations and legislation/policy provisions set at a national level. Natural England would welcome the inclusion in point 7 of the need to future proof natural resources such as water and soil through sustainable management of the resource.

Officer response

- 30.14 The Strategic Plan will play a key role in responding to the changing national policy context in relation to design. It will reflect the corporate ambition to drive up the quality of design and provide strong design and place-shaping policies, building on the existing policy framework provided in the Joint Core Strategy (JCS). The broad support for the current approach in the JCS is welcomed and this feedback will help to refine Place-making principles in the Strategic Plan that are locally distinctive. Several of the issues raised in responses will also inform the development of relevant policies in the Strategic Plan.
- 30.15 With the increased emphasis at the national level for place-making to support health and wellbeing, it will be essential that the Strategic Plan seeks to address health inequalities to ensure that no communities/populations are left behind when realising the ambitions for North Northamptonshire. The Strategic Plan will update and strengthen the policies in the JCS to help shape places where health and wellbeing is considered in every element of development and where inequalities in health and wellbeing are reduced. The commissioning of evidence based on an Environmental Justice Index is being considered, this will be able to review a multitude of data on health, access to green space and climate change to identify areas that require intervention and/or investment to ensure no inequality is had by those living and working in some areas.
- 30.16 As discussed in other responses to other questions viability assessment of the Strategic Plan will be an essential part of its development to ensure the approach is robust and deliverable. A viability assessment will be undertaken consistent with national guidance and be a key part of the evidence base to test potential standards and inform the Strategic Plan.

Natural and historic environment

Question 31. What are the key mechanisms the plan should use to achieve a net environmental gain and how can this be measured?

- 31.1 There were 89 responses to this question providing further thoughts on achieving and measuring net environmental gain.
- 31.2 Many responses mentioned that monitoring needs to take place on an independent basis using an agreed and recognised methodology and criteria by specialists. It was suggested that sites should be assessed before allocation to ensure that site selection is informed by the biodiversity on sites and a baseline is set for the site to ensure no net loss before the development starts. This could be done on large sites through a masterplan approach with a focus on biodiversity and open space.

- 31.3 Where net gain was mentioned specifically respondents varied between seeking higher percentages such as 50% net gain and the highest environmental standards, to concerns from others saying that there needs to be flexibility on smaller sites where it is difficult to achieve. Alongside this some respondents said that the government mandated 10% Biodiversity Net Gain should be used. It was also suggested that this should apply to residential, commercial and waste development and that different gains should be achieved in different areas, for example brownfield land may need to achieve 10% with other land types achieving more.
- 31.4 In relation to on and off-site provision there was recognition that there needs to be a network between all biodiversity sites. There was some concern raised that offsetting should not be allowed as this leads to green areas being lost and not for the benefit of the community.
- 31.5 There were many comments relating to land being left for wildlife and with limited access. Some respondents suggested that more tree planting should be a priority. Many wanted more protection for areas of wildlife with more areas designated and existing areas to be protected and enhanced and that this could be done through community involvement. One respondent suggested that landowners should be engaged through Environmental Land Management Schemes (ELMS) and the promotion of ecological agricultural techniques.
- 31.6 Some respondents suggested ways in which net environmental gain could be measured including, the number of trees, the biodiversity on sites, the amount of greenspace, community access to greenspace, the amount of area protected and enhanced, improved public transport and cycle provision and energy consumption. The Wildlife Trust suggested using the area of habitat that is in positive management as a measure and those targets that may be set out in the Local Nature Recovery Strategy (LNRS). They also advocated using the evidence that has already been collected on Habitat Opportunities.
- 31.7 Discussion and engagement with landowners and other stakeholders was encouraged by some respondents to maximise provision and also to understand the perpetuity of management of sites for up to 50 years. It was suggested that this should be linked with the climate change strategy to fully maximise opportunities.
- 31.8 The Environment Agency and Natural England made similar responses on this issue relating to the creation of a network of corridors across boundaries, that multiple benefits would be secured, that a natural capital approach would be beneficial and that there are various tools to help with the measurement of environmental net gain. There was also reference to the Arc work on natural capital and various national and local work streams on this topic. The Forestry Commission suggested that tree planting is one way of providing multifunctional net gain and that there is monetary support to achieve this.

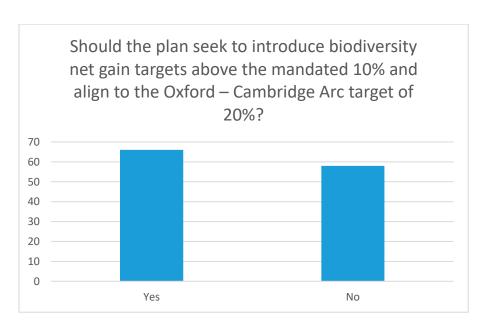
- 31.9 The development industry responded slightly differently mentioning that targets and measures should be in line with the Environment Act and should not go higher, and that there is no way of measuring net gain or an established methodology to do so. Some suggested that this is covered by the Building Regulations and anything above these will need viability testing. Conversely some developers see that strategic sites have a part to play in providing green infrastructure and that this should be a focus of all applications and that the Strategic Plan should set out key objectives and a base target for environmental net gain. They suggested that this could be made easier through site allocation and focusing on sites that can secure the best environmental gains.
- 31.10 In addition to the above responses that focussed more on biodiversity and the environment, there were other comments that related to energy and sustainability of buildings. These mentioned solar on all new developments, a reduction in fossil fuels and investment in micro renewables and that carbon, water and energy efficiency on all buildings should be maximised.

Officer response

- 31.11 The general support for achieving an Environmental Net Gain is welcomed and the suggestions within the responses are positive. Whilst Biodiversity Net Gain will be mandatory through the Environment Act, the National Planning Policy Framework (NPPF) does promote the wider encompassing Environmental Net Gain as do the Environmental Principles for the Arc. The concept of natural capital lies at the heart of North Northamptonshire's growth strategy. Biodiversity net gain is a primary driver for growing natural capital and our approach will be to take a biodiversity first approach that is founded upon and complements the requirements in the Environment Act whereby environmental enhancement should deliver biodiversity net gain first and this cannot be traded off against other natural capital benefits.
- 31.12 With regards to concerns raised about offsetting and off-site provision, these would only occur within the context of the mitigation hierarchy as set out in the NPPF (para 180a).
- 31.13 The Biodiversity metric includes a spatial hierarchy in addition to this, which developers will be required to follow which means that biodiversity impacts must first be avoided or reduced through site selection and layout. Then enhanced and restored on site and only after that should consideration be given to creating or enhancing habitats offsite. It is inevitable that due to the variation in size and condition of sites not all sites will be able to deliver a net gain on-site, off-site opportunities will therefore be important. Opportunities for maximising benefits of new habitat creation will be identified in the Local Nature Recovery Strategy. If higher net gain targets are proposed, then off-site enhancements are likely to be even more important. These can provide opportunities for significant landscape scale improvements.

- 31.14 The suggestions in responses are very much in line with the latest guidance and the measurements of trees, amount of greenspace and community access, as well as cycle provision all feed into the wider natural capital of a place.
- 31.15 Further evidence will need to be developed, and some of this work has started on how to measure and deliver environmental gain in North Northamptonshire. This will need to be refined during the preparation of the Strategic Plan working alongside the statutory stakeholders.
- 31.16 It is noted that some developers feel that going beyond the mandatory biodiversity net gain would cause issues with the viability of some developments. The approach to net gain will be assessed through viability evidence as the plan is developed. It is agreed that site selection should include elements about suitability of delivering environmental net gain and this will be taken forward in the assessment of sites.
- 31.17 It is recognised that some of the sustainability of buildings criteria will be covered within other areas of the plan or within Building Regulations.

Question 32. Should the plan seek to introduce biodiversity net gain targets above the mandated 10% and align to the Oxford – Cambridge Arc target of 20%?



- 66 respondents said 'yes'
- 58 respondents said 'no'
- 32.1 Of those that considered 20% biodiversity net gain the right target to aim for the comments related to greening of development being vital to bring the maximum opportunities for nature and the wider community. These responses stated that it also needs to be done now and not to wait for future plans, as an

increased target will offset the development pressure in the area and mitigate climate change. Rewilding areas around developments, retaining hedgerows, protecting trees were measures highlighted that respondents considered will help meet the target.

- 32.2 Along with the responses to other questions in this section there was the recognition that environmental areas and access to these are linked to health benefits and can also attract investment and jobs to an area. Some respondents expressed concern about the impacts of development, including a loss of biodiversity.
- 32.3 Many respondents suggested that as North Northamptonshire is in the Arc area then the council should be adopting the target that the Arc has signed up to. Some suggested the target should be higher than 20% as many indicator species have declined by up to 70% in the last 50 years, 20% will give real improvement. It needs to make a meaningful contribution and redress the balance from all the development taking place.
- 32.4 The Environment Agency stated that aligning with the Arc will help to achieve the goal of avoiding biodiversity deterioration. Natural England, The Forestry Commission, The Woodland Trust and The Wildlife Trust also supported the 20% target. The Wildlife Trust referenced the Lawton report that says more, bigger, better and joined up sites will help biodiversity to recover if it is done right. They considered that a 20% target will help with this and ensure that something is being delivered on the ground. They highlighted that there are many opportunities in North Northamptonshire to create bigger and better joined up habitats and that other local authorities are already looking at 20% gain.
- 32.5 Some respondents wanted assurance that targets above 10% are achievable and practical, and 20% should be encouraged where viable.
- 32.6 Some concerns were raised that is it already difficult to provide 10% with competing land pressures and that 20% could be an ambition but not the target. Similarly, some developers suggested there may be opportunities for a biodiversity net gain target above 10% on large strategic sites, however smaller sites may struggle to deliver this. It will depend on how sites are designed and delivered if the target is to be met.
- 32.7 A few respondents considered that 20% was not enough and it should be higher, with Broughton Parish Council suggesting that it should be 50%.
- 32.8 Of those that said no to any increase in target related to the Environment Act respondents including developers and the National Farmers Union stated that there is no legal basis for asking for a higher % with 10% being plenty and a significant benefit. It could also have consequences on smaller sites to deliver and that requirements should be flexible to a site.
- 32.9 The development industry concerns predominantly focused on viability with 24 respondents saying that a higher target would need to be justified through

viability testing and expressing concern on how this might impact other planning obligations. These responses highlighted that an evidence base would be needed to support any increase in a target. It was also said that local plans should not exceed national requirements as this provides a level playing field and that it is the Government's opinion that 10% provides the balance between reversing environmental decline and ambition for development. It was also commented that most sites can't deliver the 10% requirement on site therefore suitable off-site areas need to be identified. It was, however, noted by some respondents that such an approach wouldn't preclude some developments providing more if they aspire to it. It was also suggested that site allocation should be more favourable to those sites that can deliver higher than 10%.

32.10 Several developers and the National Farmers Union also made the comment that as the Arc concept may not be brought forward then there is no need to align to it, and just because it is ok for some parts of the Arc doesn't mean it should be applied throughout.

Officer response

- 32.11 The balance of responses to this question demonstrates that this issue needs careful consideration and a robust evidence base. It is recognised that there are many respondents that want to see the higher % and all the statutory consultees are advocating the higher %, however, this has been challenged by the development industry. The council has endorsed the Arc Environment Principles, and whilst the Arc Spatial Framework is no longer being progressed, partners are exploring how these principles can best be delivered and what evidence is needed to support this. Further work is needed to develop the approach in the Strategic Plan including working with relevant organisations, including statutory agencies and developers, to ensure that the position taken is one that can be achieved and supported.
- 32.12 It should be noted that the Environment Act does allow for local authorities to set higher targets than the mandatory 10%, and in fact many authorities are already doing so having secured the evidence base to support that.
- 32.13 Whilst some evidence base is already available, further interrogation of sites in North Northamptonshire will be required to understand what can be achieved through development.
- 32.14 A viability assessment will be undertaken consistent with national guidance and be a key part of the evidence base to test potential standards and inform the Strategic Plan.

Question 33. Should the plan seek to identify opportunity areas for enhancing the natural environment at a strategic scale? Should this include continuing to identify green infrastructure corridors?

- 33.1 There were 109 respondents that said the plan should seek to identify opportunity areas for enhancing the natural environment at a strategic scale and provided further details and comments. One local resident said no to this question. The comments covered many issues.
- 33.2 Many respondents considered this the most important aspect of the plan and that a proactive stance should be taken to ensure the natural environment is protected and enhanced. One asked if there is potential to designate an Area of Outstanding Natural Beauty.
- 33.3 Several respondents said that there is a need for more green spaces and that building shouldn't take place on woodland or other environmentally rich areas. Several local residents highlighted assets that had been lost due to development. Many respondents specifically mentioned Weekley Woods and that it should be preserved.
- 33.4 Some respondents identified existing assets such as the Greenway and open spaces along the Nene and commented that strategic large-scale provision is better for habitat provision. Although the importance of hedgerows should be noted as a benefit of linking areas together. Corridors are also considered important to ensure there are green routes into urban areas as well as between areas of natural significance.
- 33.5 There were other mentions of specific types of environmental improvements such as street trees and more trees at a local level, wetlands being protected, natural floodrisk management and allowing community access to some areas, whilst recognising that some areas need to be protected from access. Some respondents considered the upscaling of community planting to a wider biodiversity remit would help to meet wider biodiversity goals.
- 33.6 The benefits of green spaces for health and wellbeing was also highlighted alongside tourism benefits and that enhancements may encourage businesses to operate sustainably and attract other businesses if the natural area is managed well.
- 33.7 Public Health Northamptonshire commented that green and blue infrastructure has the opportunity to improve health and wellbeing. Other comments from service areas within the council related to links between the Local Nature Recovery Strategy (LNRS) and also that strategic scale nature sites have the opportunity to be standalone and not dictated by the location of corridors.
- 33.8 There was some concern raised by respondents that not enough weight has been given to green infrastructure through the development process in the past so policies need to ensure that areas are protected. Irthlingborough

Town Council suggested that Green Infrastructure (GI) Corridors need redefining as Protected Green Corridors and that too many developments have been permitted in them under the existing Joint Core Strategy. There was also a comment by the National Farmers Union seeking clarification about GI corridors when they go across farmland and what the impact and controls might be. Another respondent suggested that they should not prevent development but allow for delivery of enhancements.

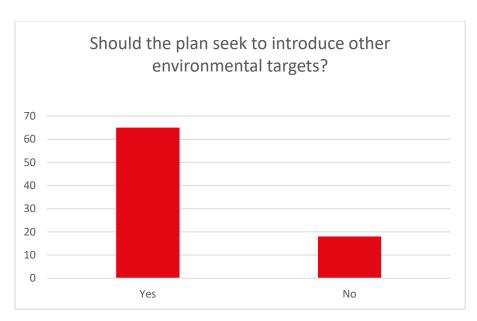
- 33.9 Developers suggested that identifying opportunity areas for enhancing the natural environment at a strategic scale including continuing to identify green infrastructure corridors will help to achieve biodiversity credits through off site delivery and also that it should be stated what is expected so as not to frustrate development. They would also welcome guidance on what approach will be taken in or adjacent to corridors to maximise opportunities for all and that it needs to be considered alongside strategic delivery of housing and employment. Another developer said that corridors that go into the rural area are needed at a local scale and opportunities to expand the network would be welcomed. Developers also referenced the sites they are promoting that they suggested would be able to deliver natural capital benefits if they were taken forward, with another suggestion that environmental enhancement should be considered on a site by site bases rather than arbitrary corridors. In addition, a point made by several logistics promoters was that logistics sites have the opportunity to deliver substantial landscaping infrastructure to provide habitat and biodiversity.
- 33.10 Conversely, some developers discouraged a blanket approach to identifying sub regional green corridors and that the plan should not go beyond the Environment Act 10% Biodiversity Net Gain in identifying sites.
- 33.11 The Environment Agency referenced blue infrastructure and there would be several significant benefits to a strategic approach to enhancing the natural environments. This includes protected floodplains, increased biodiversity etc. They considered the Plan should seek to identify opportunity areas for enhancing the natural environment at a strategic scale. This should include continuing to identify green infrastructure corridors. In particular, the plan should include reference to adopting a natural capital approach, net environmental gain, biodiversity net gain and LNRS's.
- 33.12 Natural England suggested that strategic areas could be identified through existing mapping work and the LNRS and that a recognised GI standard would help inform planning and include in design codes and guides. They highlighted that alongside its value for natural capital and placemaking, green infrastructure provides alternative natural greenspaces that can help alleviate and buffer recreational pressures on protected sites. Natural England welcomed the recognition of the recreational pressure impacts across North Northamptonshire, and the Strategic Initiatives aimed at addressing these and supported the development of clear policy requirements to address these significant pressures. A concern they highlighted was how these sites and

- corridors are going to be secured and managed in the long term for the benefit of all. They suggested funding mechanisms (e.g. developer contributions) should be embedded in policy where required and should be identified as early as possible to ensure that benefits are secured long-term.
- 33.13 The Forestry Commission stated that corridors are essential for movement and resilience to climate change and in urban areas trees can help with shading and reducing pollution. The Woodland Trust also suggested that a canopy cover target could provide many natural capital benefits.
- 33.14 The Wildlife Trust considered that strategic sites provide opportunities to help bigger, better joined up habitats as well as providing opportunities for offsite gain. It is also important to recognise that corridors should take a natural capital approach and integrate with the nature recovery strategies.
- 33.15 Some neighbouring local authorities that responded commented that they would welcome the opportunity to work together on cross-boundary environmental projects.

- 33.16 Access to natural environments provides important health and well-being benefits, which we will want to maximise in the Strategic Plan. It will therefore be important to ensure that the plan provides high quality natural spaces in locations which are accessible and that we seek to improve the equality of sustainable access to nature and its benefits across the whole area.
- 33.17 The positive nature of the responses, including support from the statutory agencies and organisations is welcomed as well as recognition of the links with the Local Nature Recovery Strategy. The priority that many respondents suggested should be given to this area in the Strategic Plan is also noted.
- 33.18 North Northamptonshire has many different environmental designations that already form a network of assets; however, the Council has developed evidence that considers opportunities for enhancement across various natural capital themes including biodiversity and water management. This evidence has the opportunity to start joining up areas to make them bigger and better delivering a strategic approach and will provide a robust basis for the approach in the Strategic Plan. It will be essential as the Strategic Plan is developed to consider all aspects of natural capital to ensure it informs site assessment and the allocations and policies within the Strategic Plan.
- 33.19 The concerns raised around weight of the green infrastructure corridors are noted, and it is important that existing and future policies should be used and understood to ensure that they are delivered. More detail on corridors will be explored with partners to ensure that opportunities are fulfilled, and challenges understood as the Strategic Plan is developed.

33.20 Whilst not a matter for the Strategic Plan, it is noted that links with community planting could be more proactive, and discussions will take place with colleagues in the Council to provide shared evidence and support for this.

Question 34. Should the plan seek to introduce other environmental targets? If so, what should they cover and how should they be measured?



- 65 respondents said 'yes'
- 18 respondents said 'no'
- 34.1 Respondents who considered that the Strategic Plan should include further environmental targets suggested many different targets across different areas. The targets that have been suggested can be split into some main categories: Environment and Nature, Built Environment, Recycling and Renewables, Transport and Social. Many of these are cross cutting between the higher themes but have been set out here for information.

Environment and Nature

Nature

- Woodlands and trees
- More parks and greenspaces
- Plants to feed the bees
- Rewilding areas
- Creation of public nature areas
- Reduction in intensive farming
- Designation of special landscapes

Water

Cleaning of waterways, water quality

No increase to risk of flooding

Air, light and noise

- Air quality
- Areas of tranquillity and dark skies
- Minimise lighting and noise

Land

- Ratio of greenfield to brownfield development and to reverse this by 2030 to brownfield
- Decontamination of land to allow for redevelopment of brownfield.
- Not to reduce greenfield sites

Built environment, Recycling and Renewables

Renewables and carbon reduction

- Solar panels on new budlings, residential and industrial
- Domestic insulation
- Renewable energy creation
- All new buildings to meet zero carbon
- Retrofit on existing buildings
- Carbon reduction

Buildings

- Housing standards
- Water supply
- Improvements to existing infrastructure

Recycling and waste

- Fly tipping reduction
- Monitor and improve recycling
- Promote biodegradable packaging
- Business should demonstrate reduction in waste production.

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Transport

- More footpaths and bridleways outside of the towns
- More active travel
- Minimisation of traffic emissions
- Reduction in travel based carbon
- More electric charging points
- Reduction in lorries on the road

Social

- People's happiness
- 34.2 The Environment Agency suggested a target for waste management and resources should be included to better reflect the aspirations of the 25 year Environment Plan to 'minimise waste, reuse materials as much as we can and manage materials at the end of their life to minimise the impact on the environment' and the Arc Environmental Principles 'work towards a circular economy'. To achieve this, they highlighted that the plan should set, monitor and deliver against ambitious waste reduction targets, take a circular approach to the use of resources throughout development, plan for waste infrastructure (including wastewater) and recognise the significant contribution restored mineral and waste sites can make to green and blue infrastructure requirement.
- 34.3 Natural England would welcome the introduction of the following environmental targets: to protect and conserve water quality and resource in North Northamptonshire, protect and conserve the best and most versatile agricultural land, and protect and conserve the Upper Nene Valley Gravel pits Special Protection Area and the species for which it is notified.
- 34.4 The Woodland Trust and Forestry Commission both referenced tree planting. The Woodland Trust seeks the inclusion of tree planting and woodland creation targets. It considered that "The best ones are expansion of tree canopy cover, as this takes in trees in streets and parks etc, as well as just woodland". The Forestry Commission suggested carbon storage targets using woodland could be part of a tree strategy for North Northamptonshire. They highlighted the multifunctional natural capital benefits of trees.
- 34.5 Most respondents who answered 'No' were developers and landowners. Some of these responses considered that the Environment Act is sufficient in introducing requirements, whereas others suggested that this would be a matter for building regulations. The Ecton Estate responded that other environmental targets should only be delivered as a requirement if the need for such a measure is properly evidenced and impacts on site viability fully assessed.

- 34.6 The Strategic Plan will focus on strategic issues and the targets within it will need to be appropriate given the scope of the plan and the policies within it. Several of the targets suggested in responses are outside the scope of the plan. The approach to, and targets for waste management and resources will be matters for the Minerals & Waste Local Plan to consider, although the importance of a circular economy is recognised.
- 34.7 The development of any further environmental targets will be informed by the evidence base for the plan as it is developed. Viability testing of the plan will be undertaken as required by the National Planning Policy

- Framework/National Planning Practice Guidance to ensure that the plan and its policies and targets are deliverable.
- 34.8 The Council has been working on various environmental evidence base from understanding ecosystem services through to identifying the best areas to make lasting opportunities through habitat opportunity mapping. In addition to this consideration has been given to wider natural capital and environmental gain and work on a Natural Capital Investment Plan has taken place and will be published early 2023. Work is also being undertaken to consider tree canopy targets across the authority area. Both will provide multi-functional benefits with environmental gains.
- 34.9 We will work with colleagues across the authority who have remits for other areas such as air quality and transport to see what targets or standards could be included that are locally distinctive to North Northamptonshire and whether the Strategic Plan is the most appropriate document to identify these.

Question 35. How should the plan seek to improve equality of sustainable access to nature and its benefits. Should the plan include standards of access to green space?

- 35.1 92 respondents provided comments and suggestions on this question. It was stated by some respondents that access to green space should be a priority for the plan as well as providing more and enhancing existing green space. The links to health benefits were frequently mentioned. Several respondents made suggestions to ensure that there is easy access to the countryside and highlighted that developments can often restrict access for existing residents, so corridors in would improve access. Responses also suggested that it was important to ensure that access reflects different needs and with appropriate infrastructure and safe access for all.
- 35.2 There were specific developments mentioned by respondents and how these would harm access to nature, including Weekley Woods, with some respondents suggesting that no greenfield land should be built on. Examples of where good management has taken place for people and wildlife were highlighted.
- 35.3 In relation to access to green space standards, there were many suggestions on what to include and that new developments must provide. These included:

Access

- Easy sustainable access by all modes of transport
- Preventing too large a footfall that may have an adverse impact on sites
- Free car parks
- Distance standards for each household so it is in easy reach for everyone Control
- Minimise noise and light pollution in all areas
- landscape protection

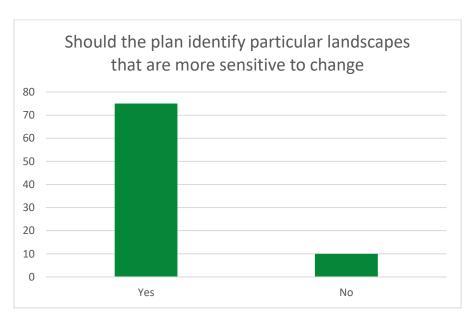
Type

- Some areas should be left for nature
- Greenspaces should have diversity not just grassland
- Variety of spaces urban and rural
- 35.4 Some respondents suggested that new developments should have natural open space within and at the edges to allow for better integration.
- 35.5 There were several mentions of the Rights of Way network, and that it should be maintained to allow good access to green space. Respondents suggested the network should be extended to allow access to other locations and this should include being able to be used by foot, cycle or scooter and in some places by horse.
- 35.6 Other suggestions for improving access to nature included local green spaces in residential areas, that schools should have natural space in their grounds, footpaths alongside rural roads to points of interest, that the network of local and strategic green space should have cycle paths between them.
- 35.7 There were suggestions by some respondents that rather than access to green space, standards of different typologies should be used based on what is in the area and what deficiencies there may be of certain types of open space.
- 35.8 Some developers said that any standards should be in line with public open space policies and applied flexibly to ensure that sites can come forward. They set out that site selection should be informed by what can be delivered on site in terms of natural green space. In addition, they also stated that development should allow for easy access to greenspace infrastructure and that some schemes could be provided privately to enhance the network.
- 35.9 Some of the responses that were less positive of further access suggested that there is already a good network of public rights of way, and that public access to some green spaces would have the potential to ruin the wildlife, and with areas of food production it is unsuitable to provide public access.
- 35.10 Responses from the statutory agencies and other relevant organisations focused on the link between health and access to natural spaces, the use of published standards by partners. The Woodland Trust referenced Natural England's Access to Greenspace Standards and the Woodland Trust Access to Woodland Standard. Natural England advocated the use of their Green Infrastructure Framework and Standards. In addition, the Environment Agency (EA) highlighted that there needs to be good transport links by all modes to places of nature and the plan should seek to improve equality of sustainable access to nature and its benefits. The EA also commented that "The growth planned for North Northamptonshire provides the opportunity to level-up communities, tackling green inequality at scale and improve the health and wellbeing of those living and working in North Northamptonshire". The Wildlife Trust also added that standards should not be squeezed in, they should form the main design of the site, and it is vital to include future management and

- how spaces can adapt to climate change. They highlighted that there are already pressures on the Special Protection Area and that alternative green spaces should be created.
- 35.11 Sport England does not advocate the use of standards for outdoor sports, instead supporting use of their calculator to provide a justified need against up-to-date evidence.

- 35.12 There was significant support for including access standards to green space in the Strategic Plan and that access should be seen as a priority both for people and wildlife. The suggestions for other aspects to consider with access are noted and further discussions will take place with officers and stakeholders on whether these can be achieved and the best mechanisms for this.
- 35.13 Access to natural environments provides important health and wellbeing benefits, which we will want to maximise in the Strategic Plan. It will therefore be important to ensure that the plan ensures that high quality natural spaces are provided in locations which are accessible and that we seek to improve the equality of sustainable access to nature and its benefits across the whole area.
- 35.14 The provision of good quality green space for people and nature must be a fundamental component of good place making. Design of development will be key in ensuring that access for all can be achieved and that design code and design principles will be developed to meet these standards. It will need to be considered whether the plan should include standards for greenspace provision and whether existing open space, sport and recreation standards in the Part 2 Local Plans should be harmonised across North Northamptonshire either through the Strategic Plan or associated Supplementary Planning Documents.

Question 36. Should the plan identify particular landscapes that are more sensitive to change?



- 75 respondents said 'yes'
- 10 respondents said 'no'
- 36.1 Several responses raised concerns about the impacts of development on the landscape, and highlighted other impacts, notably biodiversity decline, loss of woodlands, etc. The need to preserve Weekley Wood was raised in several responses. Kettering Town Council considered that Biodiversity risks will vary from site to site and the plan should identify those landscapes and area where development would cause most harm to biodiversity.
- 36.2 Several respondents noted the lack of statutory landscape designations across North Northamptonshire, including Areas of Outstanding Natural Beauty (AONBs) and that landscape designations should be strengthened in the Strategic Plan. The Nene Valley was frequently referenced, with some respondents seeking its designation as an AONB.
- 36.3 Both Save Titchmarsh and Upper Nene Valley Countryside and Habitats (STAUNCH) and Titchmarsh Parish Council considered that improving landscape protection should be a key target for the council. They both stated that the council should seek to designate the Upper Nene Valley, in the Thrapston and Oundle areas as an AONB to protect it from inappropriate development (above all logistics warehouses) and to attract more tourism. Similarly, Irthlingborough Town Council commented that there are no statutory landscape designations in North Northamptonshire and yet there are areas of high landscape values and beauty particularly within the Nene Valley. They suggested a vision should be to work toward higher landscape protection policies that take into consideration the wider views and vistas with a view to supporting the designation of an AONB for the area." CPRE

Northamptonshire raised the same issues and stated that they are currently heading a working group which is seeking to establish an AONB application for the Upper Nene Valley.

- 36.4 Other areas identified in responses included:
 - Welland Valley
 - Ise Valley
 - Weekley Glebe Wood
- 36.5 Respondents also highlighted types of landscape that need protecting ranging from floodplains, woodland, wildlife rich areas and agricultural land that they considered all give the sense of place. It was noted by some respondents that it is what is within the wider setting that gives the character, church spires, rivers, agricultural practice (ridge and furrow) and this can also be at a local scale as well as long ranging views across from key vantage points.
- 36.6 Cottingham Parish Council "would certainly wish to have the Welland Valley, at least the Northamptonshire side, considered as an area worthy of protection". The Parish Council referenced the work done for Neighbourhood Plans that could act as a guide and a reference and suggested they are "enshrined in policy statements". Other respondents referenced the need for consultation with local communities to inform the approach.
- 36.7 The sensitivity of different landscapes was highlighted in responses. One respondent considered that changes in rural and urban landscapes have different impacts. The former must be protected, that latter must be improved. Another response set out that lighting, noise, development, should be considered to keep balance and minimise disruption in sensitive landscapes. Isham Neighbourhood Plan Steering Group and Isham Parish Council stated that "The development by Tritex to the north of the village has destroyed important landscape as the changes being made are harmful to the character of the village. The identification of the landscape around the village and other settlements is an important element of a relevant Plan".
- 36.8 Headlands Area Residents Association noted local character areas. It considered there is sense in trying to gain agreement of landscapes with particular character and what they are and what should be retained- skyline, viewpoints, etc.
- 36.9 Natural England commented that as the Strategic Plan notes in the section on Landscape Character, a Landscape Character Assessment which was undertaken in 2008 for the county and informed the Joint Core Strategy is still relevant. It considered that "All landscapes are important, and it is important to enhance their character. It is also important to protect areas of existing tranquillity that remain as well as potentially zoning land use within the river valleys to preserve character. Otherwise, it will be all built up and disturbed".

- 36.10 The Strategic Plan will update the policy approach to ensure that proposals understand and respond to the character of the landscape setting within which they are located. The issues raised in responses will be fully considered in reviewing and refining the approach. Further consideration will be given to what makes a landscape special within North Northamptonshire. Recognition from Natural England that they consider the Landscape Character Assessment to still be relevant is welcomed and will help inform the approach to the evidence base.
- 36.11 The importance of the Nene Valley is recognised and the approach to this key asset will be informed by a robust evidence base. There is a statutory process for designating an AONB and Natural England has the discretion to consider whether to assess and designate an area as an AONB. Officers are discussing this further with them alongside the wider approach to landscape protection and the policy options that may be available. If local landscape designations such as Special Landscape Areas were to be considered as part of the Strategic Plan, then further evidence base would be required to ascertain whether any local landscapes met the criteria for valued landscapes under para 174 of the National Planning Policy Framework.

37. How should the plan set out a positive strategy for the conservation and enjoyment of the historic environment?

37.1 72 respondents provided feedback to the question raising a range of issues. These can be grouped into two broad themes, those covering policy issues and elements relating to conservation areas, local lists and tourism.

Policy - preservation, protection, enhancement and conservation

37.2 Several respondents referenced development in the context of historic environment. Some claimed that inappropriate development encroached on historic assets and damaged the setting and / or the view of assets and this should be prevented. Some respondents highlighted what they considered the indiscriminate siting of business parks, warehouses and housing estates as an issue. They reasoned this reduces appreciation of the historic environment, particularly the setting and views associated with historic churches, towns, villages and buildings which can be permanently and irreparably damaged. It was also suggested that there is a need to retain the fabric and structure of rural areas by discouraging the growth of such development. One respondent wanted stronger penalties when conservation requirements were ignored.

- 37.3 The preservation, protection, enhancement and conservation of heritage assets was highlighted in several responses. One respondent noted how restrictive planning regulations are to the point of prohibiting changes that would improve / revert the structure. A number of comments focused on policy provision and development suggesting that conservation should be prioritised in the plan and encourage reuse and retention of historic buildings, however some developers including Persimmon Homes East Midlands and Great Oakley Estate were of the view that all local policies should be in line with the National Planning Policy Framework, and no new standards introduced.
- 37.4 Historic England stated that assessment is of particular importance together with maintaining distinctive and separate settlements by preventing coalescence. They also offered to advise on the policy approach and that there guidance may be of assistance. Oundle Town Council stated that the Strategic Plan needs to include both general policies and site-specific policies, developed in consultation with relevant parish / town councils. M Scott Properties Ltd suggested that the Strategic Plan should have a policy framework to ensure the significance of heritage assets is considered as part of the development management process and that there is appropriate preservation of such assets.
- 37.5 When considering protection; a number of respondents pointed to a need for a high level of protection of the historic environment and zero tolerance to loss. Other responses suggested that views and settings are assets too along with unique landscapes and social and cultural assets that need protecting, and that neighbourhood plans could help ensure the protection of local assets. Conversely there was a view that some development can utilise heritage features to improve the quality of the development and enhance assets.
- 37.6 One respondent suggested encouraging development which would attract visitors to areas of historic interest. Another recognised the need for a balance between conservation but not at the expense of growth and progress for local communities. It was recognised that there is scope for development around heritage assets, but this needs to be tuned to appreciate local circumstance. One respondent proposed a zero target for new housing in some historic villages and conservation areas to discourage opportunistic applications for inappropriate development.
- 37.7 An Archaeological Advisor from NNC noted there are different strands to this depending on whether we are looking at the protection and enhancement of existing protected sites or the treatment of sites which fall within development areas. Where sites are within development areas;
 - If they are to be preserved and enhanced developers should deliver good quality schemes which are manageable for the future;
 - where a site is excavated (ahead of development) publicity and outreach is expected to disseminate information.

37.8 Hallam Land Management suggested that the Sustainability Appraisal and site selection process could be used as a tool to select allocations which present a lower risk of affecting designated heritage assets.

Conservation Areas, Local Lists and Tourism

- 37.9 Several respondents raised the issue of conservation areas, local lists and tourism. In general, respondents cited the need for a local list or register of assets and / or the continuing practice of conservation area appraisals. It was suggested this would have benefits including safeguarding assets through policy protection and enabling projects for conservation.
- 37.10 Some respondents highlighted the benefits of tourism and tourist information on how this would promote the cultural heritage and / or offer of the area. Some responses highlighted the role of cultural heritage to the rural and urban economy. A small number of respondents were keen to note that while supportive of tourism it was important assets weren't harmed as a consequence. Huntingdonshire District Council are supportive of tourism within the Nene Valley, but these must not harm designated or non-designated heritage assets.
- 37.11 5 respondents suggested sites should be made more accessible and others proposed ideas to encourage tourism including better signage and improved access for all and promotion of the historic environment using technology. 3 respondents were of the view that consultation and engagement with local people around heritage assets was important.

- 37.12 The Strategic Plan will focus on strategic heritage issues and refresh and update the policy approach to the historic environment. It will set a policy framework to ensure the significance of heritage assets is appropriately considered through the development management process and that there is appropriate preservation of assets either in situ or by investigation and recording where appropriate.
- 37.13 This approach will be informed by the issues raised in responses to ensure that future policy is robust and is appropriate to the situations it might need to be applied to. The historic environment is intrinsically linked with the landscape and the approach within the Strategic Plan will continue to recognise this. Further dialogue with Historic England will take place to formulate policy and inform the evidence base and their offer to support policy development is welcomed.
- 37.14 Tourism and the historic environment are important, with many assets located within North Northamptonshire. Dialogue with relevant stakeholders will take place to understand what policies would be helpful to allow appropriate

tourism initiatives to come forward that respect the area's historic assets and their settings.

Process and Next Steps

38. Are there any issues that you feel we have missed and should be considered in the Strategic Plan?



- 46 respondents said 'yes'
- 27 respondents said 'no'
- 38.1 Respondents raised several issues that they felt should be considered in the Strategic Plan. Needing to consult the people who live in the area more/listen to what local people want was highlighted by some residents. Some of the issues raised re-emphasised issues raised in other consultation responses.
- 38.2 Climate change was referenced in several responses. Weldon Parish Council considered that "Climate change cannot be underestimated all policies should be focusing on creating the best possible sustainable environment for our future generations". The need for on-site renewables to be included in new development and decarbonisation of public transport was highlighted in another response. Save Titchmarsh And Upper Nene Valley Countryside & Habitats also stated that the plan should be more mindful of climate change, the need for decarbonisation, and of the biggest development threat: logistics parks, which they considered bring few employment or economic benefits and can be environmentally very harmful. Titchmarsh Parish Council expressed similar concerns about logistics.
- 38.3 Improved infrastructure provision was highlighted including the lack of facilities for young people, the need for Kettering to have leisure facilities that are fit for purpose by Kettering Amateur Swimming Club. Cottingham Parish

- Council suggested that a viable and connected transport policy should be more obvious as a strategic objective.
- National Farmers Union (NFU) East Midlands highlighted Local Nature Recovery Strategies (LNRs) and Food Production. In relation to LNRs the NFU stated: "They will be important strategies that help flag up the local priorities, not only in terms of biodiversity net gain but also priorities that schemes such as the new Defra Environmental Land Management Scheme will be promoting, carbon sequestration and privately funded ecosystem services/ public goods. The NFU will be seeking to ensure that these groups are inclusive of farmers and landowners, as they are key to the delivery of the strategy across large areas of the rural district. We will also want to ensure that the LNRS does not prejudice the long term business viability of our members, affect the long term food security in the region and add to the cost and complexity of making an application for planning permission".
- 38.5 The NFU noted that in several places the boxes that highlight relevant corporate plan priorities there does not appear to be any reference to rural business, agriculture or its primary role, food production. They noted that the word agriculture does not appear on any pages on the scope and issues document and felt the countryside and a key economic driver seem to be a side line under the green and sustainable environment. Food is mentioned in the context of natural capital but not agriculture. Similarly, Stanwick Parish Council considered that the document barely mentions agriculture, horticulture or food production.
- 38.6 Irthlingborough Town Council suggested that there should be a higher levels of landscape protection and a better understanding of access to the countryside. Similarly, Pilton, Stoke Doyle and Wadenhoe Parish Council stated that "The plan should address Spatial Outcome 2: 'Distinctive environments that enhance and respect local character and enhance biodiversity' more seriously than appears to be the case by introducing stronger protection for the conservation and protection of historic assets, landscape settings and local wildlife habitat". Wildlife, ecological protection and concern about the loss of Weekley Hall Woods were also highlighted in other responses.
- 38.7 Burton Latimer Town Council were extremely critical of the lack of reference to disabled people in the consultation document. They would wish to see the addition of a new section stating specifically the commitment of NNC to supporting its disabled citizens.
- 38.8 Tarmac understood that the Strategic Plan will not contain minerals and waste planning policy specifically, as this is a matter for the Minerals and Waste Local Plan. However, they suggested the Strategic Plan must still take minerals and waste land uses into account when developing the emerging framework; it must ensure that mineral resource is safeguarded and the operation of minerals and waste sites and associated/ancillary infrastructure

are not prejudiced when either allocating sites to meet other social and economic needs, or inadvertently through restrictive policy wording.

- 38.9 As set out in the consultation document, the Scope of the Strategic Plan will focus on strategic matters which will, as a minimum, meet the requirement, set out in the National Planning Policy Framework, for the Council to have a plan that addresses the strategic priorities for its area. The issues raised in responses will be reviewed by the council to consider what the best mechanism is for responding to them and which can be appropriately taken forward in the Strategic Plan. The role of the rural area will be a key element of the Strategic Plan, including appropriately balancing different priorities, including those raised by the NFU. The development of the Strategic Plan will take minerals and waste land uses into account.
- 38.10 As discussed elsewhere, responding to the challenges of climate change will be fundamental to the Strategic Plan. Responding to and meeting the needs of different groups will be an important part of the Strategic Plan. This was discussed on pages 29-30 of the consultation document, which referenced the JCS applying optional standards, including Accessibility and wheelchair housing standards. The approach in the Strategic Plan will be informed by a robust evidence base, including Housing & Economic Needs Assessment. An Equalities Impact Assessment Screening of the Scope and Issues document was undertaken, this will be reviewed and updated throughout the preparation of the plan.



PPEAP 14th December 2022 Item 5 Appendix B

Summary of Scope and Issues Workshops feedback

Town council workshop 26th April 2022

- Concern about quality of some town centre schemes-poor quality, not meeting space standards, etc.
- Regeneration also a priority for Market Towns.
- Need to consider opportunities for higher density development but balance with quality.
- Concerns over infrastructure delivery and funding for this including council support for projects.
- Concern whether the council is listening, particularly re planning applications.
- Concern over the implementation of existing policies.
- Whether there are any plans in place to support Market Towns.
- Strong support for maintaining ongoing dialogue and collaborative working where possible.
- Support for virtual meetings with day and evening sessions.

Parish council workshop 28th April 2022

- Concern about impact of existing development on character of villages and infrastructure capacity.
- All parish representatives agreed that they had concerns regarding the delivery of infrastructure required to support growth. It was felt that delivery is poor both in road, health and education infrastructure.
- Rural affordability pricing some existing residents out.
- Concerns raised in relation to the level of public transport servicing the villages.
- Public Transport connections need to be improved.
- Improved pedestrian and cycle networks would be welcomed. Many of the villages are within just one or two miles from services and therefore improved connections would help.
- Concerns were raised that the parking standards and methodology used are not always appropriate to the situation.
- Concerns were raised that strategic policies are agreed but not necessarily considered or upheld when planning applications are approved.
- That consideration be given to holding future workshops/meetings in the evenings to allow those who work during the day to attend.
- Support for virtual meetings.
- Highlighted the importance of strategic policies matching up across the council
 I.e. North Northamptonshire Transport strategy, public transport strategies etc.

Member workshop 12th May 2022

Member feedback has been grouped into the topic areas discussed in the Scope and Issues consultation document for ease of analysis.

Relationship with Oxford-Cambridge Arc

OxCam Arc – unclear what government are wanting.

Climate change

- Electric Vehicle parking for new developments.
- Net zero construction.

Levelling Up

 Levelling Up and regeneration – Scrutiny Review Group report coming out soon – three neighbourhood areas to address in Strategic Plan.

The spatial strategy for the distribution of development

- The current JCS had an urban focus which has led to a lack of development in the villages, leading to their decline. Being urban focussed and making villages unsustainable is short sighted.
- Housing delivery allow more freedom to develop in areas where there is no opposition.
- Include new villages and towns to help meet targets.
- Increase the range of areas to build.
- The villages do recognise the need for right development and are not antidevelopment.
- Not currently meeting local needs.
- More sustainable communities lead to less travel look at 15 minute zones.
- Look at the cumulative impact of development.

Housing

- More stringent standards for buildings.
- More social housing needed in the area.
- Care/retirement villages.
- Need to talk about accommodation needs.

Economic Growth

- Does not like the emphasis on B8 and logistics, which is downgrading skills.
- Need for mix of employment too many B8 schemes.
- Encourage the provision of a higher education establishment.
- Need to bring extra employment.
- Employment need to be aspirational.

• Empty offices/warehouses – incentives for conversion, make it easier.

Town Centres

Very strong policies needed on regeneration.

Infrastructure

- Lack of the right type of infrastructure when building.
- Need to understand what people want Infrastructure Register required.
- Negotiate the right S106 agreements.
- Encourage better employment in the area.
- Issues in both rural areas and towns due to lack of transport.
- Proposed taxi harmonisation lack of public transport.
- Need for infrastructure GPs, school places.
- Need to be very strong on infrastructure.
- Need to ensure developments do not impact on transport and highways.

Place-making/sustainable development

- Improvement of health and wellbeing should feature strongly in the Plan, to enable the Council to be able to reject planning applications on health and wellbeing grounds.
- Need parking standards introduced.

Natural and Historic Environment

- Biodiversity Net Gain Cambridge is pushing 20%. Look at bespoke percentages for different areas.
- Mitigation monitoring build in Strategic Plan.
- Biodiversity closed landfill sites should be in Strategic Plan.

Other comments

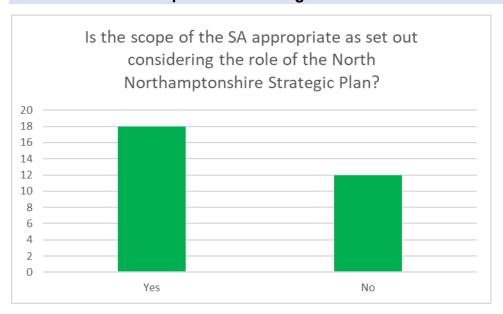
- Public engagement how do we increase responses.
- Use of interactive models and online resources.
- NNC website needs more information.
- Strategic part of plan needs to be more visible to the public.
- Use of large signs on potential sites when publicising consultations on strategic sites.



PPEAP 14th December 2022 Item 5 Appendix C North Northamptonshire SA Scoping Report Response Summary

Scope of the SA

Question 39. Is the scope of the SA appropriate as set out considering the role of the North Northamptonshire Strategic Plan?



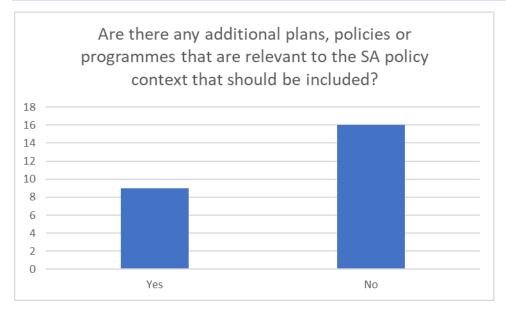
- 18 respondents said 'Yes'.
- 12 respondents said 'No'.
- 39.1 Respondents who did not consider the scope of the SA to be appropriate set out a number of reasons why and suggested ways in which the scope could be broadened.
- 39.2 The Environment Agency set out the importance of green and blue infrastructure and the role it plays in reducing inequalities and improving health and wellbeing. They also set out that a natural capital approach should be adopted in relation to all aspects of plan, particularly climate change, biodiversity and air quality. On the theme of climate change they also noted that it should be recognised that areas not currently at risk of flooding may be at risk in the future.
- 39.3 Another respondent noted that there was a lack of reference to design quality of the built environment or architecture.
- 39.4 IM Properties supported much of the scope of the SA. However, they expressed some concerns on how the document addressed jobs growth and targets, stating that a simple jobs target does not take into account the range and skill level of jobs. They suggested that a more detailed approach is required to ensure that the needs of individual sectors are met in terms of the

- quantity of employment land required, the location of employment land and the overall number of jobs.
- 39.5 IM Properties also expressed concerns on how 'managing the demand and growth of logistics in a sustainable manner' is listed as a key sustainability issue in the SA Scoping Report and how this portrays the sector in a negative light. It was suggested that the Strategic Plan should plan positively for logistics growth recognising the strengths in North Northamptonshire whilst ensuring any growth remains sustainable.
- 39.6 STAUNCH commented on the document as a whole and the consultation process, stating that evidence and arguments are not always clear, and the process needs to be more transparent if communities are to be more involved in the shaping of their places. They stated that the SA Scoping Report talks about 'reasonable alternatives' when choosing places for development and this should be given much more prominence in the planning process.

39.7 Overall, the responses were supportive of the scope of the SA. The issues raised in responses will inform the development of the SA to ensure that it is as robust as possible and identifies and responds to relevant issues.

Additional plans, policies or programmes

Question 40. Are there any additional plans, policies or programmes that are relevant to the SA policy context that should be included (Appendix 1)?



- 9 respondents said 'Yes'.
- 16 respondents said 'No'.

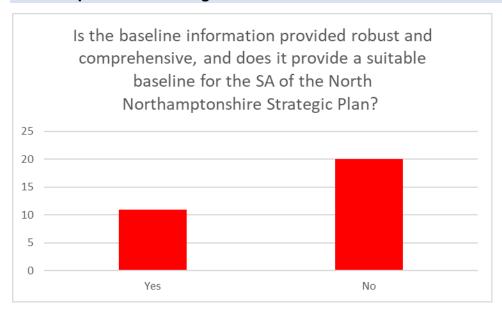
- 40.1 Most of the nine respondents who answered 'yes' to this consultation question also put forward suggested additional plans, policies or programmes in their response. These are as follows:
- 40.2 The Environment Agency suggested the inclusion of the following:
 - Land Contamination Risk Management
 - Contaminated Land Regulations 2006 (mentioned in SA text but not Appendix)
 - Part 2A Statutory Guidance: Contaminated land statutory guidance ((mentioned in SA text but not Appendix)
 - Oxford-Cambridge Environmental Principles (mentioned in SA text but not Appendix)
 - The State of the Environment: Health, People and the Environment (2020)
- 40.3 IM Properties noted that a number of European Union directives included are no longer considered to be appropriate now the UK has left the EU. They did however suggest that the Economic Recovery for the South East Midlands (2021) document produced by SEMLEP should be included.
- 40.4 St Modwen Logistics suggested that references to North Northamptonshire's Part 2 Local Plans should be removed as they state that they will no longer be up to date when the JCS is replaced and thus should not be used to inform the North Northamptonshire Strategic Plan. St Modwen also highlighted the deficiency in sectoral employment evidence base, namely the logistics sector and notes other areas where such work has been undertaken.
- 40.5 St Modwen also stated that the policy review section should also reflect and reference the positive support the current development plan has for logistics, through Policy 24 of the JCS. They also noted that the policy context section provided limited context on transport issues relevant to North Northamptonshire and that more recognition should be given to transport policy and linkages between transport and investment strategies and the planning for the specific locational requirements of different sectors.

40.6 Overall, most respondents did not think that there needed to be any additional plans, policies or programmes that should be referenced within the SA Scoping Report. Only the Environment Agency, St Modwen and IM Properties suggested additional documents/regulations/guidance that ought to be mentioned or referenced in Appendix 1 of the report and these are all reasonable suggestions that could be included in the SA as it is developed. The suggested removal of certain documents will need to be considered, taking account the national policy context. The Part 2 Local Plans will remain extant when the Strategic Plan is adopted and should be referenced. In relation to St Modwen's point on the deficiency of logistics sector evidence, a

Logistics Study has been prepared for the SEMLEP area which will inform the Strategic Plan alongside other local evidence such as the Housing and Economic Needs Assessment (HENA). The approach to logistics in the Strategic Plan is discussed in the Scope and Issues responses, specifically Question 22

Baseline information

Question 41. Is the baseline information provided robust and comprehensive, and does it provide a suitable baseline for the SA of the North Northamptonshire Strategic Plan?



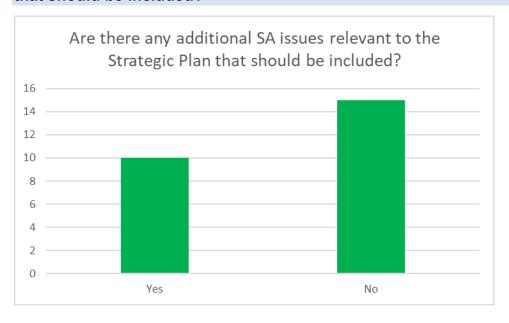
- 11 respondents said 'Yes'.
- 20 respondents said 'No'.
- 41.1 There are some parallels between the answers given to this question and question 39 on the appropriateness of the scope of the SA Scoping Report.
- 41.2 Of those that said answered 'no', many did not explain why they thought this, however from those that did, the following was noted:
- 41.3 One respondent accepted that the document was robust in every sector other than that of the built environment but did not suggest any specific changes.
- 41.4 Some respondents pointed out that some of the baseline information is out of date and should be revised, namely information that has used Census data from 2011 and that it would be prudent to update this to the soon to be released 2021 data.
- 41.5 On the employment baseline, IM Properties expressed concerns that none of the data sources presented provide an indication of the demand for employment land going forward.

- 41.6 Prologis expressed similar concerns to the above in that they considered the approach to calculating employment land as flawed and not fully aligned with the Planning Practice guidance. They recommended that the Council undertakes an updated and detailed assessment of employment land need as part of the evidence base for the Strategic Plan.
- 41.7 St Modwen Logistics highlighted that there is an imbalance between employment land supply in the west of North Northamptonshire compared to the east and that this should be reflected in future iterations of the SA. They also suggested greater recognition of key transport routes running through North Northamptonshire within the document regarding their economic role and importance.
- 41.8 North Northamptonshire Council's Education service responded in regard to the evidence base relating to Education. They highlighted that the evidence base used in the SA Scoping Report to show pupil yield will need to be reviewed and updated and that consideration needs to be given to early years, sixth form and SEND provision. Any new yield forecasts will need to be consistent with new DfE guidance.

- 41.9 Overall, despite most of those that responded to this question considering that the baseline information in the SA Scoping Report to not be robust and comprehensive, there were not a lot of suggestions by way of improving the document.
- 41.10 Concerns that some of the baseline information is out of date (e.g. 2011 Census data) is recognised and there will be scope to update some of the relevant information to the 2021 baseline when this data is fully released and understood. This is also the case for the data surrounding pupil yield which can be updated once the information is available.
- 41.11 Some of the concerns relating to employment issues surrounding employment land availability and demand should be addressed by evidence being prepared for the Strategic Plan, including the development of the HENA and other employment related studies such as the SEMLEP Logistics Study.

Additional SA issues

Question 42. Are there any additional SA issues relevant to the Strategic Plan that should be included?

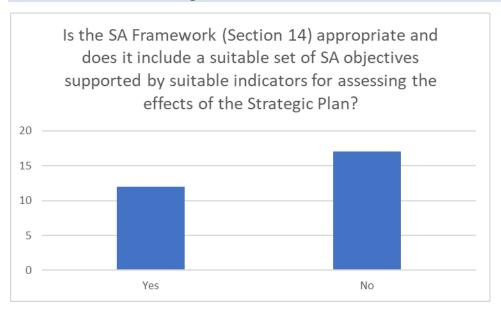


- 10 respondents said 'Yes'.
- 15 respondents said 'No'.
- 42.1 Responses to this question reflected similar themes already raised within responses to earlier questions on the SA Scoping Report consultation. Most respondents did not identify any further issues for the document to cover, however those that did noted the following:
- 42.2 One respondent desired a fuller section on the health and wellbeing benefits to North Northamptonshire on the built environment.
- 42.3 The Environment Agency recommended including more information on contaminated land within the appropriate section and some specific suggestions were made.
- 42.4 Harborough District Council highlighted some information relating to environmental sensitivity issues, these included nutrient and water neutrality requirements issued by Natural England. They also highlighted Anglian Water's WRMP and the regional water deficits likely to be affecting the area.
- 42.5 Ecton Parish Council highlighted a number of issues including suggestions for green corridors, focus on regenerating town centres rather than out of town retail parks, the provision of cycle routes including the extension of the Greenway and rural broadband provision.
- 42.6 St Modwen Logistics reiterated the issue of imbalance between employment land supply in the west of North Northamptonshire compared to the east and that this should be reflected in future iterations of the SA.

42.7 Overall, there was not an abundance of additional issues raised by consultees, but some recommendations on some of the more technical environmental issues are noted and will be considered as the document is revised and developed. Some of the issues relating to specific parish councils may not be appropriate for this document, but some of the broader areas that these issues relate to can be fine-tuned if necessary.

SA Framework

Question 43. Is the SA Framework (Section 14) appropriate and does it include a suitable set of SA objectives supported by suitable indicators for assessing the effects of the Strategic Plan?



- 12 respondents said 'Yes'.
- 17 respondents said 'No'.
- 43.1 Despite this consultation question receiving more 'No' responses than 'Yes', not all respondents expanded on their answer. However, those that felt the SA Framework or the list of objectives/indicators within were not suitable, explained in some detail as to why they thought this. These were as follows:
- 43.2 One respondent again noted a lack of reference to the quality of the built environment within this section.
- 43.3 Another respondent highlighted Indicator SA15 in particular, stating that promoting walking and cycling isn't going to solve problems of accessing work and leisure activities and public transport is not convenient enough for people to use.

- 43.4 Irthlingborough Town Council referenced food production and the maintenance of agricultural land and that indicators for landscape protection should include special areas of protection.
- 43.5 Several developers (Bellway Homes, Hallam Land Management, Miller Homes and Central England Co-Operative) suggested the inclusion of an additional indicator in relation to ensuring a deliverable housing land supply. They also suggested under the SA Topic of Climate Change that an indicator should be added with recommended wording as follows; "Directing development via the Strategic Plan's spatial strategy to sustainable and accessible locations where walking, cycling and public transport use can be maximised reducing the ned to travel by car."
- 43.6 On the area of employment within the SA Framework, IM Properties considered that in relation to employment land, a buffer should be applied over and beyond the identified need to ensure flexibility and market competitiveness. Furthermore, they felt many of the indicators act more as objectives or aspirations rather than monitoring indicators and gave an example in relation to the indicator on promoting business development and providing for start-up businesses. They suggested that more specific measures to monitor economic performance would be more appropriate.
- 43.7 St Modwen Logistics provided a very detailed response to this question. Their initial overall comments pointed to some concerns over the supportive text of the SA Framework in that the indicators set out are 'not definitive' and that this is too ambiguous, and some clarity should be sought on this wording. They also raised concerns that the SA objectives that are listed are different from those that were outlined for the JCS, and that no explanation has been given as to why these changes have taken place.
- 43.8 Like IM Properties, St Modwen outlined more detailed concerns on the SA Framework with regards to the economy section. They set out that more, not fewer objectives are necessary on issues relating to employment and the economy given the increased focus on this sector within the region. St Modwen specifically disagree with the deletion of the 'Wealth Creation' and 'Encourage different patterns of movement' objectives that were present in the previous SA for the JCS, but not for the new Strategic Plan.
- 43.9 St Modwen also made comments on the colour coded non-numeric system intended for use against each development option up for consideration. They expressed concerns that this system lacks clarity on how options will be compared against one another to determine their relative sustainability performance and that there is risk of subjectivity and is currently lacking the robustness needed.

43.10 This consultation question on the SA Scoping Report triggered the most detailed responses. As described above most of the issues identified by respondents surrounded the set of objectives and indicators listed within the

- SA Framework. It appears some clarity is needed on changes between the SA Framework that was put together for the JCS and the one for the new Strategic Plan as well as the proposed matrix for use against assessing development options.
- 43.11 Again, specifics on employment and economy issues within the SA Framework were a key area of interest amongst some respondents and consideration for additions and further detail on specific indicators and objectives will potentially be required. Responses received will inform the refinement of the SA Framework.





North Northamptonshire Council

1 DECEMBER 2022 TO 31 MARCH 2023

Published by: Democratic Services

Leader of North Northamptonshire Council: Councillor Jason Smithers

INTRODUCTION

decisions" which the Executive or another body or officer so authorised are likely to take over a four month period. The Plan is updated on a rolling monthly basis. to take 'key decisions' and to hold meetings or parts of meetings in private. It gives advance notice of all the "key decisions" and "exempt (Meetings and Access to Information) (England) Regulations 2012. Its purpose is to provide the required 28 days notice of the Council's intention This is the North Northamptonshire Council's Forward Plan. It is published pursuant to The Local Authorities (Executive Arrangements)

The Members of the Executive are:	
Councillor Jason Smithers	Leader of North Northamptonshire Council
Councillor Helen Howell	Deputy Leader of North Northamptonshire
	Council
On modification in the state of	ספסיר, בפוסמים, כמונמים מוזע וכעוופוו
Councillor Helen Harrison	Adults, Health and Wellbeing
Councillor Scott Edwards	Children, Families, Education and Skills
Councillor Harriet Pentland	Climate and Green Environment
Councillor Lloyd Bunday	Finance and Transformation
Councillor David Brackenbury	Growth and Regeneration
Councillor Graham Lawman	Highways, Travel and Assets
Councillor Matt Binley	Housing, Communities and Levelling-Up
Councillor David Howes	Rural Communities and Localism

Officer considers that this is necessary in order to avoid the public disclosure of confidential or exempt information. meetings open to the press and public. The press and public will only be excluded from such meetings as and when the Council's Monitoring The concept of a "key decision" is intended to capture the most important or significant decisions. "Key decisions" will normally be made at

The authority has decided that a Key Decision is one which is likely:-

- to result in the authority incurring expenditure of which is, or the making of savings which are, significant; or
- to be significant in terms of its effects on communities living or working in an area comprising two or more electoral wards in the area of the authority."

The Council has decided that significant expenditure or savings are those amounting to above £500,000

being issued by the Secretary of State in accordance with section 9Q of the Local Government Act 2000. In determining the meaning of "significant" for these purposes North Northamptonshire Council will also have regard to any guidance for the time

documents. or the nature of the proceedings that confidential information would be disclosed. meeting. Members of the public are excluded from meetings whenever it is likely that, in the view of the nature of the business to be transacted Constitution. This plan provides advance notice of any items which may be held in private. At times it may be necessary for the North Northamptonshire Council to give consideration to items where the public may be excluded from the Details of the exemption categories can be found in the 'Access to Information Procedure Rules' section in the Council's This includes exclusion from access to any pertinent

undermentioned officer. Persons wishing to make such representations and/or obtain further details in respect of any issues referred to in the Plan should contact the members of the public to make representations to the Council on why an exempt item should be considered in public, rather than in private. Paragraph 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 provides for

sufficiently important and/or sensitive so that it is reasonable for a member of the public to expect it to be recorded and published. Committees or Sub-Committee or officers as they consider appropriate. These will be those decisions that are considered to be significant or The Monitoring Officer may also include in the Forward Plan references to such other decisions, which are to be taken by the Council or any of its

David Pope, Democratic Services All general questions or queries about the contents of this Forward Plan or about the arrangements for taking key decisions should be raised with

Please email: democraticservices@northnorthants.gov.uk

			December 2022	r 2022			
Subject of the Decision:	Purpose of Report	Decision Maker	Is it a key decision?	Will it contain exempt information? //Reasons for exemption, if any	Consultation undertaken	Anticipated Date of Decision:	Report Author
Capital Programme Update	To report any adjustments to the in-year programme	Executive	Yes	N _o		22 nd December 2022	Executive Director of Finance
Budget Forecast Update	To report any adjustments to the in-year budget	Executive	Yes	No		22 nd December 2022	Executive Director of Finance
Budget 2023/24 and Medium-Term Financial Plan	To seek recommendation to Council to approve the 2023-24 Budget and MTFP	Executive	Yes	N _o		22 nd December 2022	Executive Director of Finance
Specialist Care Centre – Business Case and Recommendations	To consider and approve the proposed strategy	Executive	Yes	N _o		22 nd December 2022	Executive Director - Adults, Communities and Wellbeing
Disaggregation of the Joint Sensory Impairment Service to	To approve the disaggregation of the Joint Sensory	Executive	Yes	No		22 nd December 2022	Executive Director of Children's

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Towns Fund Multi-use Building	Procurement of Home Care Service for North Northamptonshire	Carbon Management Plan	Asset Disposal Policy	NNC and establishment of a new operating model
To agree the submission of Business Case Summary Document to Department for Levelling Up, Housing and Communities (DLUHC).	To approve Procurement of Home Care Service for North Northamptonshire. Contract value in region of £86.6m	To consider the Council's carbon footprint data and carbon management plan	Approval of a forward policy for asset disposals	Impairment Service to NNC and establishment of a new operating model
Executive	Executive	Executive	Executive	
Yes	Yes	Yes	Yes	
No	N _o	No	No	
22 nd December 2022	22 nd December 2022	22 nd December 2022	22 nd December 2022	
Executive Director – Place & Economy	Executive Director - Adults, Communities and Wellbeing	Executive Director – Place & Economy	Executive Director – Place & Economy	Services

	To ap rolling of Mir	е –		Corporate Parenting Board Annual Report
To approve funding agreement	To approve a rolling programme of Minor Works	To approve the expansion project	To approve the capital project to replace the temporary mobile units at Rowan Gate School, Wellingborough	Approve establishment of Corporate parenting Operational Groups; inclusion of corporate parenting responsibilities
Executive	Executive	Executive	Executive	Executive
Yes	Yes	Yes	Yes	Yes
Yes; paragraph 3	No	Yes; paragraph 3	Yes; paragraph 3	No
				Annual report submitted to and agreed by Corporate Parenting Board 29/9
22 nd December 2022	22 nd December 2022	22 nd December 2022	22 nd December 2022	22 nd December 2022
Children's Services	Children's Services	Children's Services	Children's Services	Children's Services

			January 2023	2023			
Subject of the Decision:	Purpose of Report	Decision Maker	Is it a key decision?	Will it contain exempt information? // Reasons for exemption, if any	Consultation undertaken	Anticipated Date of Decision:	Report Author
Budget Forecast Update	To report any adjustments to the in-year budget	Executive	Yes	No		12 th January 2023	Executive Director of Finance
North Northamptonshire Local Nature Recovery Strategy	To consider arrangements for progressing a Local Nature recovery Strategy for North Northants	Executive	Yes	No		12 th January 2023	Executive Director – Place & Economy
Security Services Contract	To consider procurement of a corporate security services contract	Executive	Yes	No		12 th January 2023	Executive Director – Place & Economy
Draft NNC Homelessness and Rough Sleeping Strategy - Permission to Consult	To seek permission to proceed to formal statutory consultation on the draft Homelessness	Executive	Yes	No		12 th January 2023	Executive Director - Adults, Communities and Wellbeing

Continuation of Capital Investment Programme	Housing Development - Former Grange Methodist Church Site, Kettering	Housing Development Pipeline	Housing Revenue Account Integration and Housing Strategy Roadmap	
Seeking to procure a framework contract for the undertaking of capital improvement works to the Council's housing stock	Approval to procure the main contractor for a new-build Council housing development	To inform Executive about the current and projected sites to be brought forward for Council Housing development	Approval of the approach to integrate the HRA	and Rough Sleeping Strategy 2023-2028 for NNC
Executive	Executive	Executive	Executive	
Yes	Yes	Yes	Yes	
No	Partially; paragraph 3	N _O	Z _o	
	Public consultation as part of planning process	Yes; with Registered Housing Providers and Developers		
12 th January 2023	12 th January 2023	12 th January 2023	12 th January 2023	
Executive Director - Adults, Communities and Wellbeing	Executive Director - Adults, Communities and Wellbeing	Executive Director - Adults, Communities and Wellbeing	Executive Director - Adults, Communities and Wellbeing	

	Procurement of Shared Parts and Materials Suppliers for Housing Stock
Services stores	To approve the award of 7 supply contracts for parts and materials for the Bronett
	Executive
	Yes
	N _o
	12 th January 2023
	Executive Director - Adults, Communities and Wellbeing

			- Control of the Cont	
2023-27	General Fund Final Budget 2023-24 and Medium Term Financial Plan Canital Programme	HRA Final Budget 2023-24 and Medium Term Financial Plan	Subject of the Decision:	
approval to Council the Capital Programme 2023-27	To recommend for approval to Council the General Fund Final Budget 2023-24 and MTFP	To recommend for approval to Council the HRA Final Budget 2023-24 and MTFP	Purpose of Report	
nxecunve	Executive	Executive	Decision Maker	
e e	Yes	Yes	ls it a key decision?	February 2023
Ö	Z O	No	Will it contain exempt information? //Reasons for exemption, if any	2023
			Consultation undertaken	
9th February 2023	9 th February 2023	9 th February 2023	Anticipated Date of Decision:	
Executive Director of Finance		Executive Director of Finance	Report Author	
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The Lawrences Site	Procurement of Grounds Maintenance Consortia Contract	Capital Programme Update 2022/23	Budget Forecast Update
Proposal for social housing development	Seeking approval to commence a procurement exercise for the contract for provision of grounds maintenance services for the NNC lead consortia for Town and Parish partners	To report any adjustments to the in-year programme	To report any adjustments to the in-year budget
Executive	Executive	Executive	Executive
Yes	Yes	Yes	Yes
No	No	No	No
Yes, as part of planning process	Development of specification has been done in consultation with the partners.		
16 th February 2023	16 th February 2023	16 th February 2023	16 th February 2023
Executive Director - Adults, Communities and Wellbeing	Executive Director – Place & Economy Page 511	Executive Director of Finance	Executive Director of Finance

Subject of the Decision:	Purpose of Report	Decision Maker	Is it a key decision?	Will it contain exempt information? //Reasons for exemption, if any	Consultation undertaken	Anticipated Date of Decision:	Report Author
Budget Forecast Update	To report any adjustments to the in-year budget	Executive	Yes	No		16 th March 2023	Executive Director of Finance
Capital Programme Update 2022/23	To report any adjustments to the in-year programme	Executive	Yes	No		16 th March 2023	Executive Director of Finance
Commercial Property Service Contract Review	To consider options for delivery of commercial portfolio contract management	Executive	Yes	N _o		16 th March 2023	Executive 5 Director – Place e g
NCC Homelessness and Rough Sleeping Strategy 2023-28	To adopt the proposed Strategy following consultation and subsequent amendments	Executive	Yes	No		16 th March 2023	Executive Director - Adults, Communities and Wellbeing