

## PLANNING POLICY EXECUTIVE ADVISORY PANEL

### Wednesday 14<sup>th</sup> December 2022

<b>Report Title</b>	<b>North Northamptonshire Strategic Plan Scope and Issues Consultation</b>
<b>Report Author</b>	<b>Simon James – Policy Manager (Strategic Policy, Design and Delivery)</b> <a href="mailto:simon.james@northnorthants.gov.uk">simon.james@northnorthants.gov.uk</a>
<b>Relevant Executive Member</b>	<b>Councillor David Brackenbury – Executive Member for Growth and Regeneration</b>

#### 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

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- 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

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- 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 21<sup>st</sup> February 2022 meeting. Consultation on the Scope and Issues, which represented the formal commencement of the Strategic Plan, was undertaken for 8 weeks between 28<sup>th</sup> March and 23<sup>rd</sup> 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 28<sup>th</sup> 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 26<sup>th</sup> 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**

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- 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**

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- 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 28<sup>th</sup> March to the 23<sup>rd</sup> 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 28<sup>th</sup> 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 26<sup>th</sup> 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. 378<sup>1</sup> 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 online<sup>2</sup>. 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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<sup>1</sup> 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.

<sup>2</sup> 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

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### *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 over-reliance 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 6<sup>th</sup> December through a [Written Ministerial Statement](#)<sup>3</sup> 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 plan-period 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 Study<sup>4</sup>, 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

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

<sup>4</sup> 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 Plan<sup>5</sup> on 9<sup>th</sup> 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

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<sup>5</sup> Planning Policy EAP 9<sup>th</sup> 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 26<sup>th</sup> 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**

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- 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)**

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### **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**

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- 8.1. [North Northamptonshire Local Development Scheme](#)
- 8.2. [North Northamptonshire Strategic Plan Scope and Issues consultation web page](#)
- 8.3. Planning Policy EAP 26<sup>th</sup> September 2022 [Report on Planning Policy Work Programme Update](#) (Item 5)
- 8.4. [Minutes of Planning Policy EAP 28<sup>th</sup> June 2022](#)
- 8.5. [Minutes of Planning Policy EAP 21<sup>st</sup> February 2022](#)
- 8.6. Planning Policy EAP 21<sup>st</sup> February 2022 [Report on North Northamptonshire Strategic Plan Scope and Issues](#) (Item 5)
- 8.7. Planning Policy EAP 9<sup>th</sup> 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