

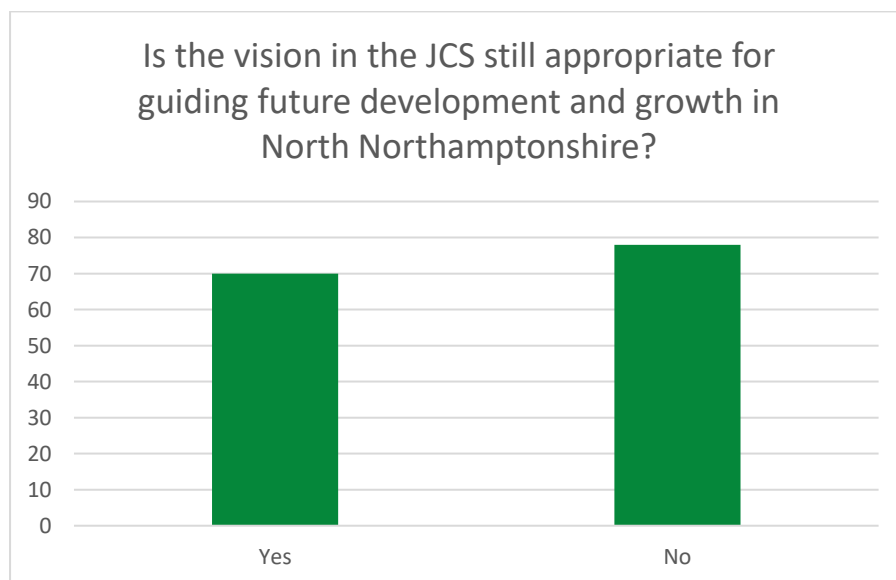
# PPEAP 14<sup>th</sup> December 2022 Item 5 Appendix A

## 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.

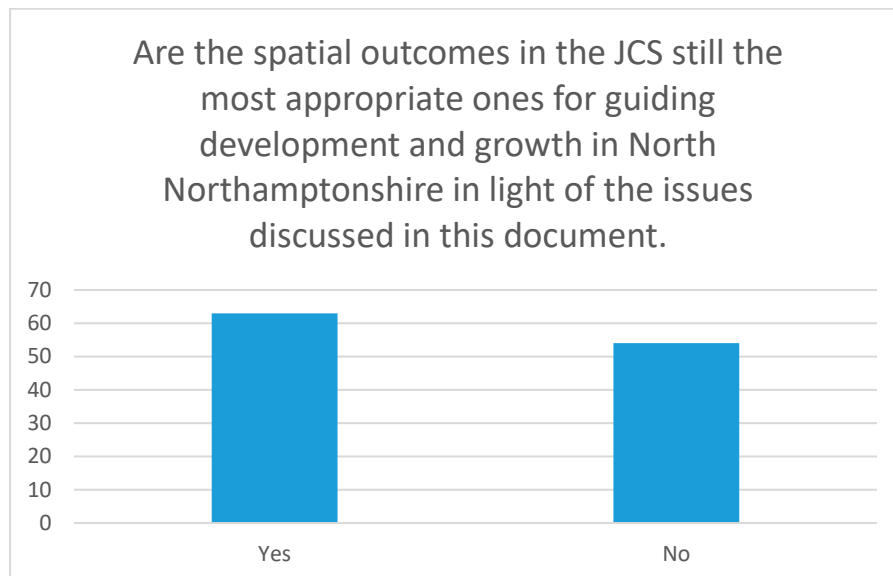
- 1.12 A number of respondents commented on the need to address the climate emergency that has been declared and that the strategy must be focused on developing in a zero-carbon way. One responded suggested that a stronger emphasis is needed to address CO<sub>2</sub> from transport. They suggested that 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 climate 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.



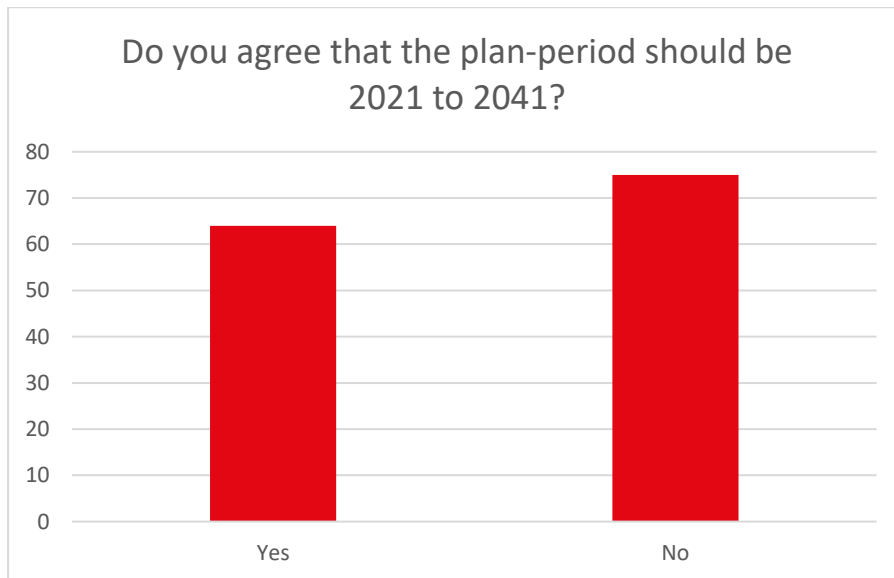
- That the Arc will increase the gap between cities like Oxford, Cambridge and Milton Keynes offering highly paid, skilled employment and North Northamptonshire becoming the logistics and dormitory function of the Arc.

### ***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.

***Officer response***

- 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 28<sup>th</sup> 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.
- 6.4 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).
- 6.5 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.
- 6.11 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.

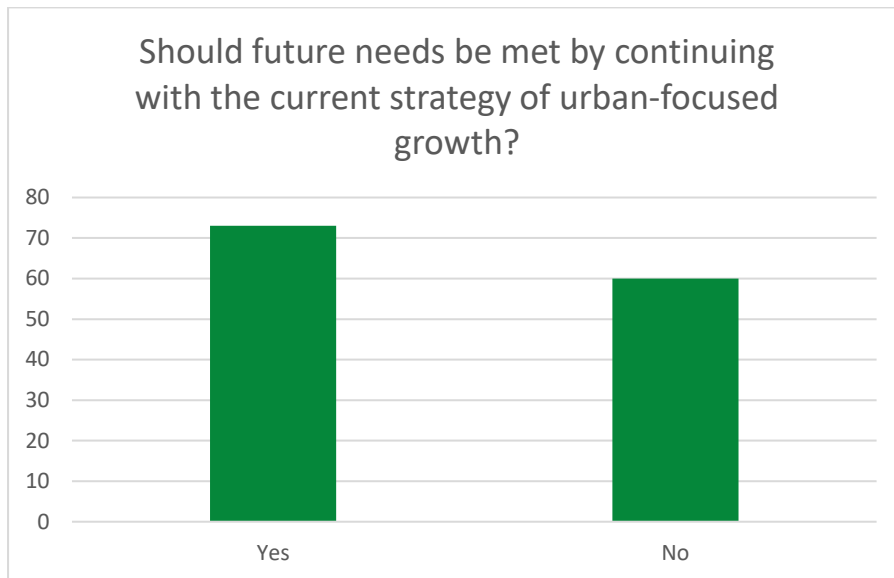
- 8.3 One respondent suggested that disabled, low income and single parent families, and the homeless are priority areas. Another respondent highlighted mental health and that there should be more protected open spaces.
- 8.4 Weldon Parish Council suggested a cohesive and sustainable transport strategy. 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 under-delivery 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 urban-focused 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 self-defeating 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 urban areas 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 urban-focused 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 under-delivery. 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 as they are 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***

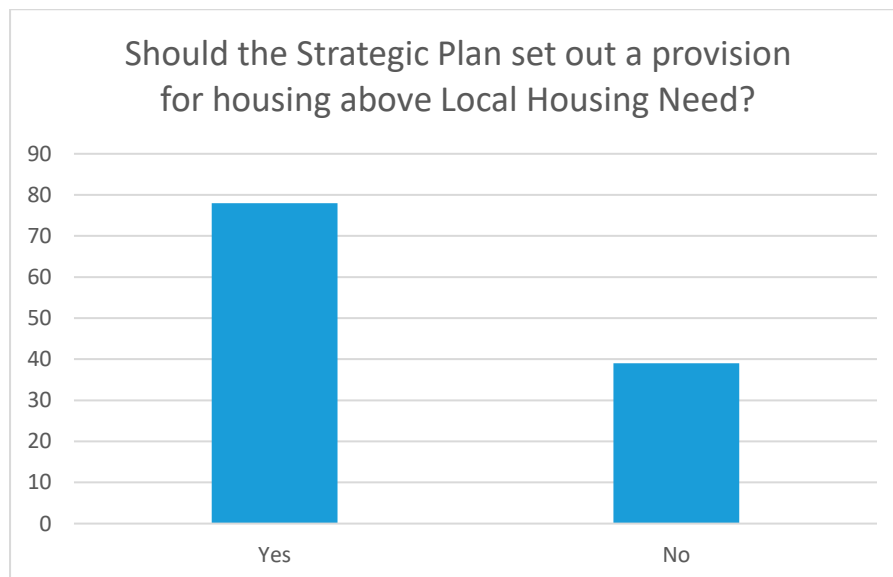
- 10.9 The overall spatial strategy for the distribution of development (particularly housing and employment) is a central element of the plan. The approach taken will be dependent on the response to many of the other issues raised as part of this consultation.
- 10.10 It is noted that there was support 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*”.

### **Officer response**

- 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 31<sup>st</sup> 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.

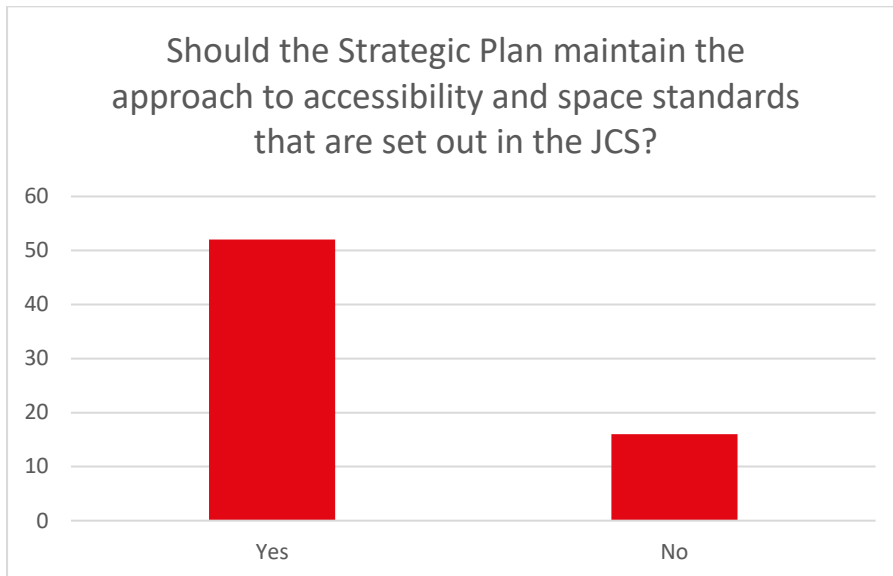
- 13.6 The need for affordable housing, including in the rural area and particularly for younger families featured in several responses, including from Gretton Parish Council and Wellingborough Town Council. Gretton Parish Council suggested that there should be an increase in smaller starter homes so 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 affecting 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”*.

**Officer response**

- 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

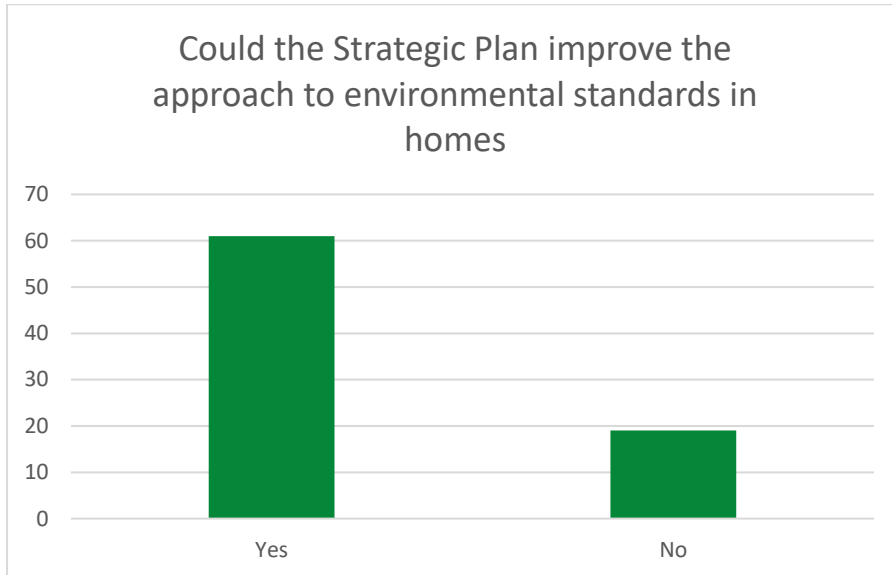
be sufficiently flexible to allow developments to depart from those standards where it is demonstrated that they will not be achievable due to viability, site constraints, site feasibility and other relevant factors.

- 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.

### ***Officer response***

- 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.

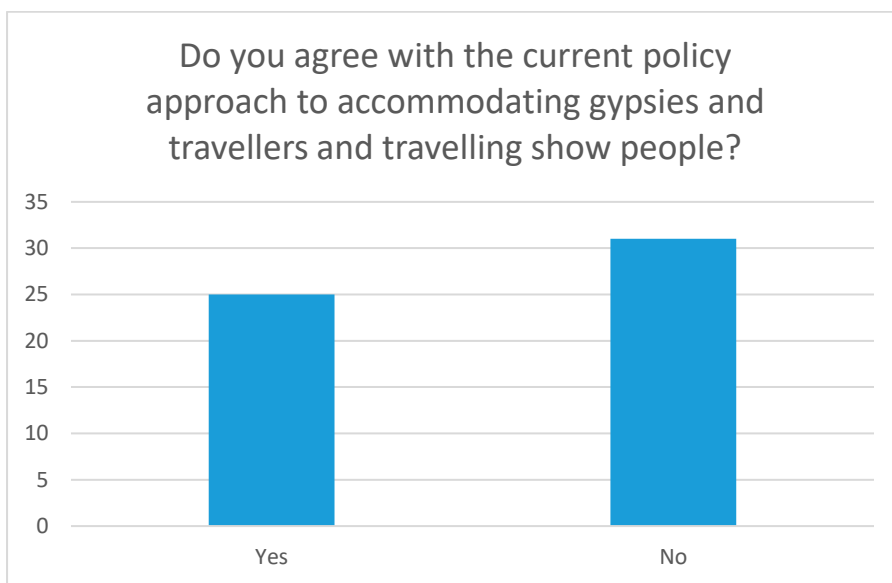
- 15.7 Those that responded 'no', and made comments were predominantly, although not exclusively from the development industry (building industry and landowner representatives). The view they expressed was that the plan should not include very specific environmental standards for new homes but should 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.

### ***Officer response***

- 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.**

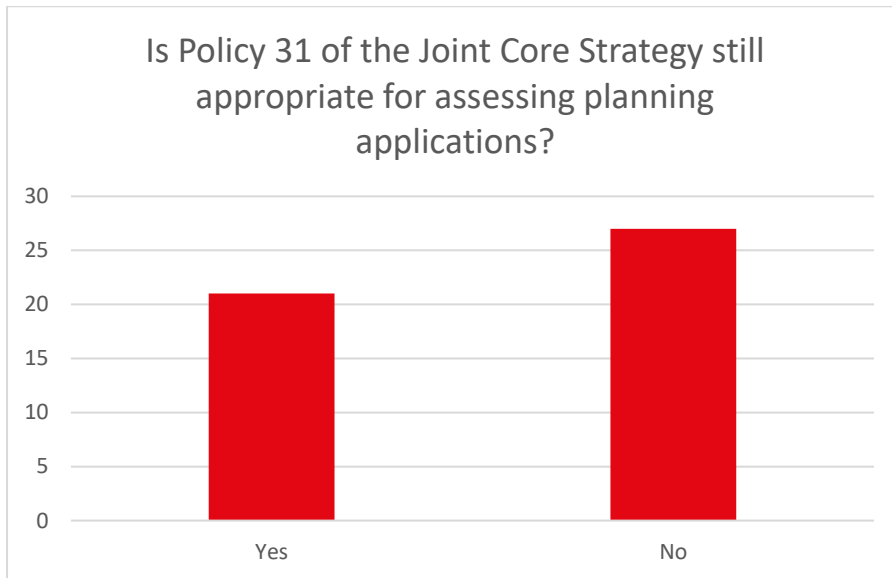


- 25 respondents said 'yes'
- 31 respondents said 'no'

- 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:

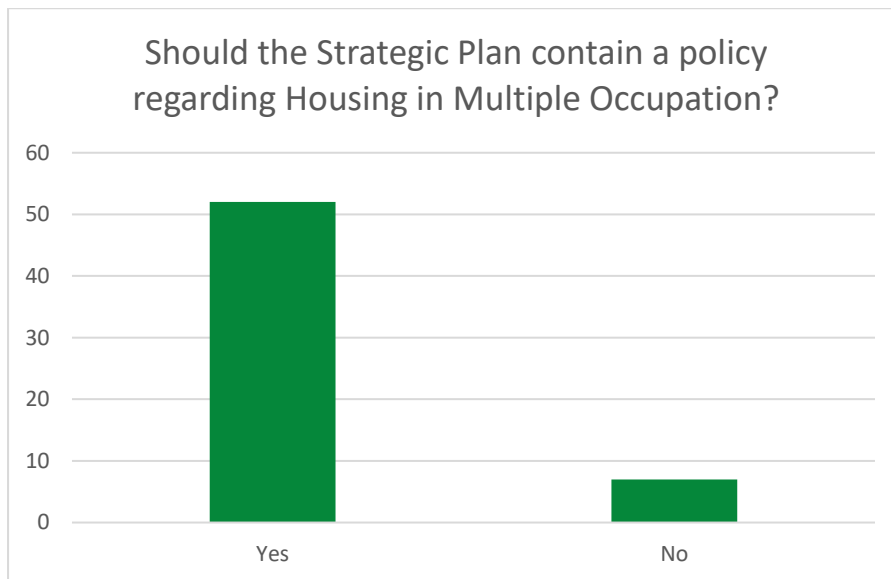
- Objection to criteria (a) of Policy 31 that requires the site to be closely linked to an existing settlement on the grounds that all other parameters are then compromised. It is argued that sites should be on out of town and remote brownfield sites otherwise any existing settlement must be adversely 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.



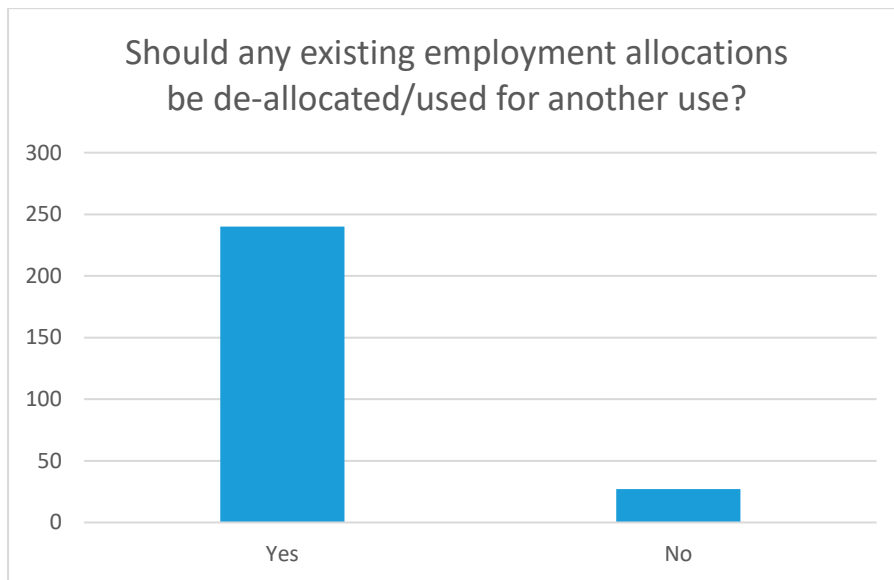
## Economic growth

### 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 de-allocated 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 de-allocated 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:

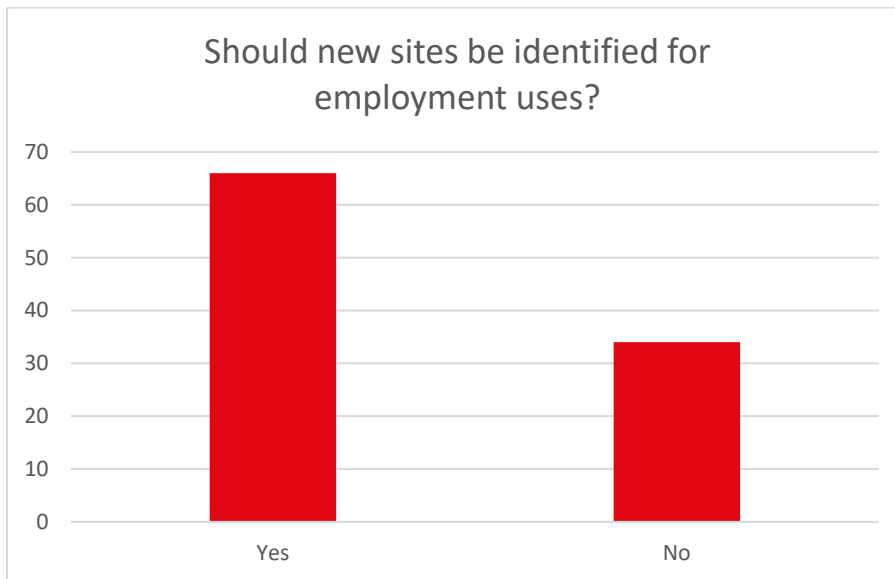
- Over 20,000 residents have signed a petition to save it.
- That the site is not suitable for warehouses
- It is an important site for residents, providing a number of benefits, that has become particularly important during the post Covid period
- Wildlife, biodiversity value

- 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 over-supply 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 be 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 pre-supposes 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 issues-changing 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 study<sup>1</sup>, 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.

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<sup>1</sup> Warehousing and Logistics in the South East Midlands, Icen Projects Limited on behalf of South East Midlands Local Economic Partnership September 2022

- 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 cross-referenced 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?**

- 25.1 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 co-exist 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.

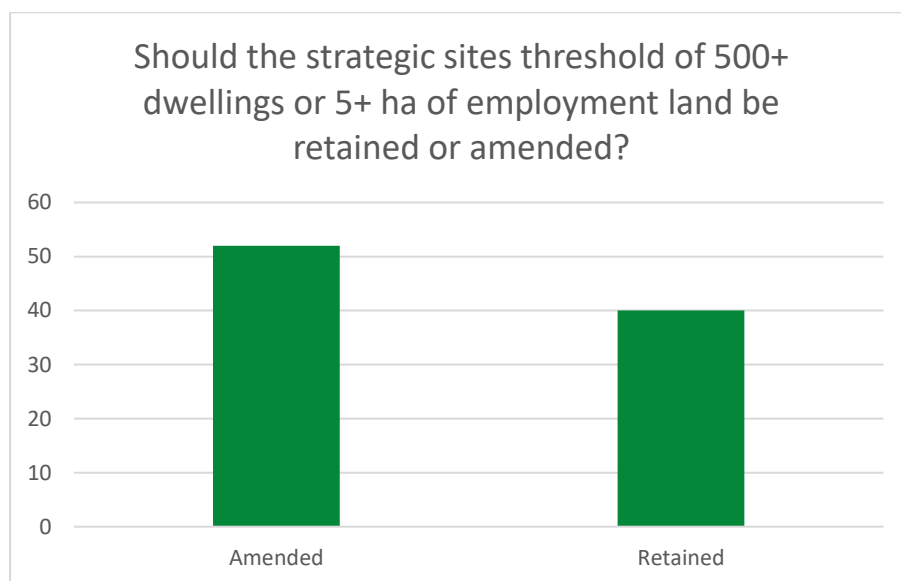
### ***Officer response to Questions 26 & 27***

- 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 place-making 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.

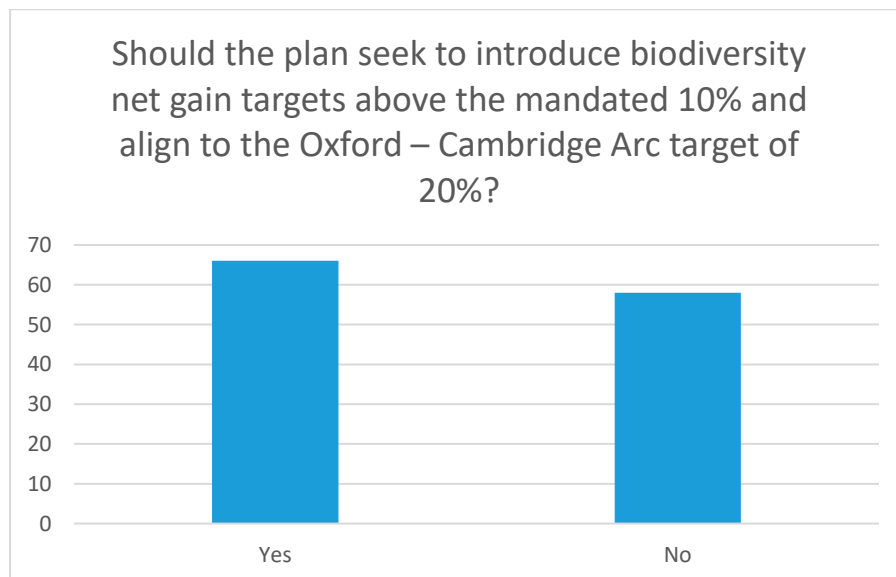
- 31.9 The development industry responded slightly differently mentioning that targets and measures should be in line with the Environment Act and should not go higher, and that there is no way of measuring net gain or an established methodology to do so. Some suggested that this is covered by the Building 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.

### ***Officer response***

- 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 buildings, 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.
- 

### ***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.

## **Officer response**

- 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.

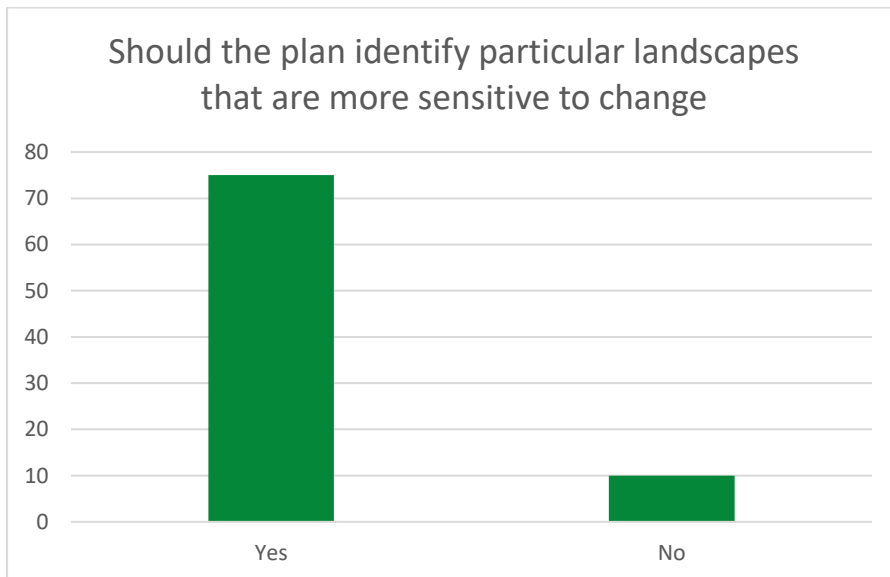
***Officer response***

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*”.

## **Officer response**

- 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 their 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.

### ***Officer response***

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.

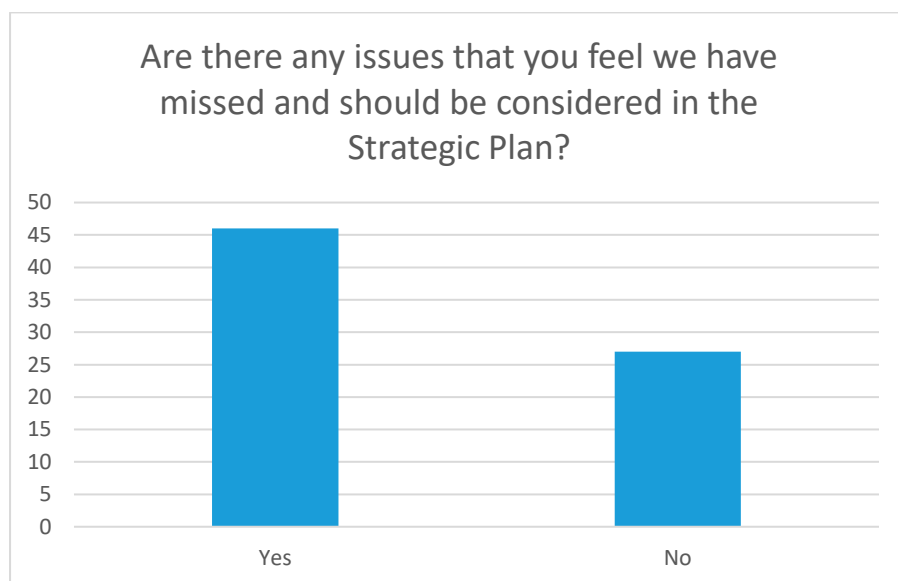
37.14 Tourism and the historic environment are important, with many assets located within North Northamptonshire. Dialogue with relevant stakeholders will take place to understand what policies would be helpful to allow appropriate



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.

- 38.4 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.

***Officer response***

- 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.