

Sustainability Appraisal (SA) for the East Northamptonshire Site Specific Part 2 Local Plan

SA Report

East Northamptonshire Council

January, 2021

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Introduction

1. Background

1.1 Introduction

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging East Northamptonshire Local Plan Part 2 (ENLP).
- 1.1.2 From the 1st April 2021 East Northamptonshire Council will become a new Unitary Council along with Wellingborough, Kettering and Corby Councils. Which will be known as North Northamptonshire Unitary.
- 1.1.3 The ENLP will contain locally specific policies and site allocations that elaborate and provide more detail on how the adopted Joint Core Strategy (JCS) will be implemented within East Northamptonshire including where more local guidance is required.
- 1.1.4 The ENLP will form part of the new Local Plan for 2011-2031 that comprises two parts. Part 1 is the Joint Core Strategy (JCS) for North Northamptonshire. The Development Plan for East Northamptonshire will also include any 'made' Neighbourhood Plans.
- 1.1.5 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²
- 1.2.2 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives.'³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following three questions:
1. What has Plan-making/ SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
 2. What are the SA findings at this stage?
 - i.e. in relation to the Draft Plan.
 3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2019). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

1.3 This SA Report

- 1.3.1 This SA Report is published alongside the Publication Draft (Pre-Submission) version, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and, as such, each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.
- 1.3.2 Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve? and ii) What is the scope of the SA?

2. What is the plan seeking to achieve?

2.1 Overview

- 2.1.1 The Council is preparing the ENLP for East Northamptonshire. It will form part of the Local Plan for 2011-2031, which comprises two parts.
- 2.1.2 Part 1 is the Joint Core Strategy (JCS) for North Northamptonshire⁴ which was adopted by the Joint Planning Committee on behalf of Kettering, Corby, Wellingborough and East Northamptonshire councils in July 2016. It sets out a long-term vision for the area and establishes the overall spatial strategy for growth including key strategic issues such as the amount of new housing and jobs, infrastructure priorities, proposals for enhancing the environment and the policy framework for development control. The JCS also contains strategic site allocations including the Rushden East Sustainable Urban Extension (Policy 33) and Land at Nene Valley Farm (Policy 35 – also known as “Rushden Gateway”) and provides the framework for all subsequent planning documents, including Part 2 Local Plans and Neighbourhood Plans.
- 2.1.3 The ENLP for East Northamptonshire will contain locally specific policies and site allocations that elaborate and provide more detail on how the JCS will be implemented within East Northamptonshire including where more local guidance is required.

2.2 Plan vision and objectives

- 2.2.1 The JCS provides a vision statement for North Northamptonshire as a whole, and a set of strategic outcomes that ENLP and Neighbourhood Plans must support in order to achieve that vision.

Joint Core Strategy Vision

By 2031, North Northamptonshire will be a showpiece for modern green living and well managed sustainable development: a resilient area where local choices have increased the ability to adapt to the impacts of climate change and to global economic changes. The special mixed urban-rural character of North Northamptonshire will have been maintained through urban-focused growth supporting a strong network of vibrant and regenerated settlements, which each maintain their separate and distinct character within an enhanced green framework of living, working countryside.

North Northamptonshire will be outward looking, taking advantage of its excellent strategic transport connectivity to be a nationally important growth area and focus for inward investment. Plan led change will have made North Northamptonshire, its northern and southern sub-areas and individual settlements more self-reliant, with more choices available locally. Investment in infrastructure, services and facilities and growth in high quality jobs will have led to less need to travel and will have shaped places in a way that meets the needs and aspirations of local people.

A strong focus on growing investment in tourism, leisure and green infrastructure will be balanced with the protection and enhancement of the area’s landscape character and its valuable built and natural environment.

North Northamptonshire will be an exemplar for construction-based innovation and the delivery of low carbon growth. Its high-quality environment and prosperous economy will ensure it has a stronger profile within the UK and Europe; widely recognised as a safe, healthy, affordable and attractive area for residents and visitors, and an excellent place for business to invest in.

⁴ [North Northamptonshire Joint Core Strategy 2011-2031](#), July 2016

Ecosystems will be protected and enhanced, and provision of ecosystem services increased where demand exists.

The Rockingham Forest will be re-invigorated through major new tree planting, providing carbon storage and a focus for tourism, recreation and sustainable wood fuel production. Restored and newly created habitats in the Nene Valley Nature Improvement Area, will have delivered improvements for both wildlife and people and a step change in nature conservation whilst recognising its tourism potential.

Contributing to this overall vision – East Northamptonshire

- 2.2.2 The JCS also sets out a specific vision for East Northamptonshire.

East Northamptonshire will be the heartland of small and medium sized enterprises, based on regenerated and thriving market towns with an enhanced role for Rushden as the District's Growth Town. Implementation of the consented development at Rushden Lakes will have provided a new out of centre retail and leisure offer serving residents in the southern area of North Northamptonshire and delivering significant environmental benefits in the Nene Valley. Diverse, sustainable villages and a living, working countryside will provide the backdrop for tourism, creative industries and low carbon businesses to locate at the meeting point of the Nene Valley and Rockingham Forest.

Sub-area Visions

- 2.2.3 The Part 2 Plan sets out three distinctive sub-area Visions which, together with the Core Strategy Vision, will provide an overall spatial Vision for East Northamptonshire.

Rockingham Forest/ Welland Valley

A focus for managing climate change, delivering carbon storage through re-forestation, and balancing this through ecosystem services, delivering sustainable tourism, informal leisure and new carbon-efficient businesses.

The function of Oundle and Thrapston as key service centres for Rockingham Forest and focal points for growth in the Forest; providing a buffer between the “green” (forest) and “blue” (River Nene), at the heart of the district.

Nene Valley/ Claylands

The Nene Valley defines the character of the six towns within the district, and as such will be a focal point for strategic developments and “blue” tourism, to deliver water based ecosystem services and overall enhancements to tourism and the wider economy.

The Claylands will be a focus for the rural economy, specifically sustainable agricultural businesses, and reconciling this with the “blue” infrastructure function of the Nene Valley.

Predominantly urban southern sub-area

The focal point for strategic housing and employment growth within the district, with a particular focus upon the Rushden's Growth Town status and the successful delivery of the Rushden East and Rushden Gateway developments.

Successful implementation and integration of the already committed major developments at the Market Towns of Higham Ferrers, Irthlingborough and Raunds.

Reconciliation of the need to secure enhancements to the Nene Valley's natural capital, while recognising the need to deliver the wider Local Plan growth agenda.

3. What's the scope of the SA?

3.1 Introduction

- 3.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) SA.
- 3.1.2 Further information on the scope of the SA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix I** in the form of the Scoping Report.

3.2 Key sustainability issues and SA Framework

- 3.2.1 An important output from the scoping exercise is the identification of key sustainability issues to help inform the appraisal process. Table 3.1 below summarises the issues drawn from the scoping review. These are presented alongside the SA Framework Objectives.
- 3.2.2 In addition to the key issues, Table 3.1 outlines the SA Objectives and supporting criteria established through the JCS appraisal process⁵. This framework is a suitable starting point for the Part 2 Local Plan. However, tweaks have been made to reflect the locally specific issues identified through the scoping process for the Part 2 Local Plan.
- 3.2.3 Where the objectives / guiding criteria do not fully reflect the key issues for East Northamptonshire, amendments to the SA Framework have been made (to reflect any locally specific issues). Where additions have been made these have been underlined.
- 3.2.4 The overarching objectives are still considered to be relevant, and thus no changes are proposed. Some minor tweaks have been made to the guiding criteria.

Table 3.1: Key issues identified through Scoping and associated SA Objectives

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Accessibility</p> <p>Rural deprivation linked to access to services and facilities.</p> <p>Improve accessibility and transport links from residential areas to key services, facilities and employment area.</p> <p>Enhance access to natural, environmental and recreational opportunities.</p> <p>The plan will need to locate services and facilities where they are most accessible by a range of modes of transport.</p> <p>The design of new development should ensure that walking, cycling and access to public transport are easily facilitated.</p>	<p>Accessibility</p> <p>To improve accessibility and transport links from residential areas to key services, facilities and employment areas, and enhance access to the natural environment and recreation opportunities</p>	<ul style="list-style-type: none"> • Improve access for the disabled? • Improve access to public transport? • Improve public transport services? • Improve access to local services and facilities? • Improve access to IT/ high speed Broadband? • Improve access by foot or cycle? • Ensure services are located to maintain the viability of settlements? • Reduce the need to travel? • Reduce travel distances (particularly journey to work)? • <u>Help to support the viability of facilities and services in rural areas?</u> • <u>Improve access to services for rural communities?</u>

⁵ A SA framework was developed by the North Northamptonshire Joint Planning Unit (NNJPU) with the intention that it be used for all planning documents across the area.

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Housing</p> <p>Number of annual completions is now above the JCS annual requirement. This needs to be monitored to make sure it stays at or above the requirement.</p>	<p>Housing</p> <p>Ensure that new housing provided meets the needs of the area, provide affordable and decent housing for all</p>	<ul style="list-style-type: none"> • Reduce homelessness? • Provide enough affordable housing to meet need from all sections of the community? • Reduce the number of unfit homes? • Provide housing to meet local needs in the rural area? • Provide a range of house types and sizes? • Facilitate provision of new homes in communities with sense of place and adequate access to facilities? • Facilitate provision of new homes which are easy to maintain and heat and which minimise the impact on the environment?
<p>Health</p> <p>The 2016 Health Profile for East Northamptonshire concludes that health priorities within the district should include;</p> <ul style="list-style-type: none"> - reducing smoking in pregnancy; - reducing obesity; and - promoting breastfeeding. <p>The percentage of women taking part in sport once a week is low compared to men.</p> <p>Prioritise active lifestyles at the local level, to address falling rates of active participation in sport.</p>	<p>Health</p> <p>Improve overall levels of physical, mental and social well-being, and reduce disparities between different groups and different areas</p>	<ul style="list-style-type: none"> • Address health and welfare needs and inequalities in the area? • Encourage healthy lifestyles (including travel choices)? • Improve sporting or recreational facilities and access to them? • Improve access to high quality health facilities? • Increase number of people in urban areas with access to public open space?
<p>Crime</p> <p>Pockets of deprivation across the urban areas.</p> <p>Small increase in total offences over the past year (6%).</p> <p>Ensuring crime and the fear of crime is considered when designing environments.</p> <p>Seek to 'design out crime' in new developments as per the Secured by Design Principles.</p>	<p>Crime</p> <p>To improve community safety, reduce the incidences of crime and the fear of crime - a safe place to live</p>	<ul style="list-style-type: none"> • Reduce incidences of crime? • Reduce the fear of crime? • Ensure design and layout minimises the opportunity for crime? • Involve the community in control of their local area?
<p>Community</p> <p>Promote mixed-use development that will help drive a broadly-based, dynamic local economy and vibrant community that combines retail, leisure, cultural and commercial facilities and attractions.</p>	<p>Community:</p> <p>Value and nurture a sense of belonging in a cohesive and vibrant community, whilst</p>	<ul style="list-style-type: none"> • Increase the ability of people to influence decisions? • Improve cultural diversity? • Create or sustain a vibrant community? • Encourage engagement in community activities?

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Protection of high-quality community facilities.</p> <p>Enhance low quality existing community facilities.</p>	<p>respecting diversity</p>	<ul style="list-style-type: none"> • Meet specific needs of a section of the community • Will it maintain and enhance community facilities and provide locations for community level activities and organisations?
<p>Skills</p> <p>Attainment of higher level of qualifications is lower than the regional and national rates.</p> <p>Poor education levels can limit social mobility and limit job prospects.</p> <p>Need to offer opportunities to gain further qualifications for all groups.</p> <p>Develop opportunities to enhance education and training opportunities through the economic strategy for the Local Plan Part 2.</p>	<p>Skills</p> <p>To improve overall levels of education and skills.</p>	<ul style="list-style-type: none"> • Improve access to educational/learning or training facilities for all ages and social groups? • Will it help to improve people's skills? • Will it improve uptake of learning and training in urban and rural areas?
<p>Liveability</p> <p>Enabling effective connection between Greenway proposals and new developments throughout the district to maximise opportunities to access natural green spaces.</p> <p>Ensure that the Greenway Forward Plan provides an effective tool for development and management of the Greenway.</p>	<p>Liveability</p> <p>To create healthy, clean and pleasant environments for people to enjoy living, working and recreating in and to protect and enhance residential amenity</p>	<ul style="list-style-type: none"> • Reduce noise pollution? • Improve the cleanliness of the environment? • Reduce unpleasant odours? • Improve the satisfaction of people with their neighbourhoods? • And improve /safeguard tranquillity? • Minimise light pollution or reduce or remove light pollution? • Enable effective connection between developments and Greenway proposals
<p>Biodiversity</p> <p>Development to avoid designated and local biodiversity assets.</p> <p>Ensure protection of the SPA and ensure development that may have an impact on the SPA is refused or mitigation sought if acceptable.</p> <p>Promotion of GI corridors and identification and delivery of local corridors.</p> <p>Enhancement and joining up of assets where appropriate.</p> <p>Use of ecosystem services to create a network of multi-functional spaces that provide a wide range of benefits.</p>	<p>Biodiversity</p> <p>To protect, conserve and enhance biodiversity, geodiversity, wildlife habitats and green infrastructure to achieve a net gain and to avoid habitat fragmentation</p>	<ul style="list-style-type: none"> • Protect and enhance sites of acknowledged importance for wildlife (SSSIs, CWS, LNRs)? • Avoid harm to and enhance opportunities for protected species and others listed in the Northamptonshire Red Data Book? • Create habitats of value for wildlife in particular those which meet BAP target? • Improve the connectivity of green spaces and green networks? • Improve appropriate access to natural areas? • Avoid fragmentation of habitats? • Create new greenspace networks? • Improve management of habitats? • Will it allow biodiversity to adapt to the impacts of climate change?

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Impact of new housing development upon the Upper Nene Valley Gravel Pits SPA/ Ramsar site</p> <p>Landscape</p> <p>Light and noise pollution in rural areas.</p> <p>Impact of new development on sensitive landscapes.</p> <p>Identification and prioritisation of the most special areas of landscape types for views, vistas, skylines.</p> <p>Use of local landscape character assessments to inform design and layout of new developments.</p> <p>Identify new areas for tree planting to recreate lost areas and create joined up larger areas of woodland.</p> <p>Identify and protect historic ridge and furrow areas.</p>	<p>Landscape</p> <p>To protect and enhance the quality, character and local distinctiveness of the natural and cultural landscape and the built environment.</p>	<ul style="list-style-type: none"> • Ensure that landscape character, including historic landscape character, and townscape assessments are used to assess the capacity of areas to absorb new development thereby influencing the location and scale of development? • Ensure landscape Character Assessment influences design of the built environment and networks of green infrastructure? • Maintain and enhance the quality of the built environment? • Protect, maintain, enhance and expand good quality of open space within and adjacent to settlements? • Create buildings and spaces that are attractive, functional, adaptable and durable that compliment, enhance and support local character? • Encourage the re-use of and refurbishment of the existing built environment? • Protect and maintain levels of tranquillity?
<p>Cultural Heritage</p> <p>Development pressures associated with levels of growth already planned for the District could have negative impacts upon cultural heritage, unless carefully managed.</p> <p>Impact of new development on designated and non-designated heritage assets.</p> <p>Challenges in maintaining up to date records of heritage assets; e.g. local listings and Buildings at Risk registers.</p> <p>Identification of the optimum/ sustainable solutions to secure the longer-term future of Buildings at Risk.</p>	<p>Cultural Heritage</p> <p>Protect and enhance sites, features and areas of historical, archaeological, architectural and artistic interest and their settings</p>	<ul style="list-style-type: none"> • Protect and enhance sites, features and areas of historical, archaeological and cultural value and their setting? • Protect and enhance sites of geological value? • Help to provide solutions for heritage at risk?

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Climate change</p> <p>Ensure that new development occurs in sustainable locations.</p> <p>Use of oil heating in rural areas.</p> <p>High emissions in relation to transport.</p> <p>Improvements in the agricultural industry to improve emissions.</p> <p>Increase in population is likely to lead to more emissions through transport.</p> <p>Understanding the implications of national climate change legislation and policies at the local (district) level.</p> <p>No district climate change strategy (a Northamptonshire one is in place until 2017).</p> <p>Use of increase in tree planting to act as a carbon storage.</p>	<p>Climate change</p> <p>Reduce the emissions of greenhouse gases and impact of climate change (adaptation)</p>	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases? • Increase tree cover? • Ensure adaptability of environments and buildings to natural hazards? • Promote resource efficient buildings? • Encourage innovation in sustainable design and construction? • Support rural communities to reduce reliance on oil heating? • Encourage the use of sustainable technologies and practices in agriculture?
<p>Air quality</p> <p>Increase in road traffic growth, due to residential, employment and infrastructure developments, is likely to negatively impact on air quality.</p> <p>New highway infrastructure may impact air pollutant levels at different locations.</p> <p>Consideration of health issues that can be improved with changes to air pollution.</p> <p>Use of trees to improve air quality and provide multiple ecosystem services</p>	<p>Air quality</p> <p>To maintain or improve local air quality</p>	<ul style="list-style-type: none"> • Reduce traffic related pollution? • Minimise or reduce light pollution? • Reduce levels of dust or particulates? • Support the use of green infrastructure to help improve environmental quality?

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Water</p> <p>Significant investment required in the management of run-off and flood risk and upgrading of waste water treatment capacity and sewerage networks.</p> <p>Increasing water demands in an area of low rainfall and an area of water stress.</p> <p>Increase level of development within the District could lead to deterioration in biological water quality unless carefully managed.</p> <p>Opportunity to improve water quality in areas that are not currently meeting good ecological status.</p> <p>Implications of water extraction upon water quality and biodiversity of the main rivers and their tributaries; e.g. waterside biodiversity.</p>	<p>Water</p> <p>Maintain or improve the quality of ground and surface water resources and minimise the demand for water</p>	<ul style="list-style-type: none"> • Minimise or reduce the risk of pollution to water, and enhance water quality in areas of poor quality? • Encourage water efficiency? • Will it reduce levels of pollution to water (utilising SUDS)? • Reduce water consumption? • Ensure capacity of available water resources, taking into account climate change?
<p>Natural Hazard</p> <p>The planned growth poses serious challenges for the management and limitation of run off and flood risk.</p> <p>Risk of flooding with the sewer network in some areas and new development must mitigate this risk.</p> <p>Surface water needs to be managed in several areas with infrastructure improvements identified.</p>	<p>Natural Hazard</p> <p>Reduce the impact of flooding and avoid additional risk</p>	<ul style="list-style-type: none"> • Reduce the risk of/effects of flooding, taking into account climate change? • Encourage Sustainable Drainage Systems? • Ensure adaptability of environments and buildings to natural hazards?
<p>Soil and Land</p> <p>Ensure that the highest quality of agricultural land is preserved where possible.</p>	<p>Soil and Land</p> <p>Ensure the efficient use of land and maintain the resource of productive soil</p>	<ul style="list-style-type: none"> • Maintain the best and most versatile agricultural land? • Reduce the risk of land contamination? • Remediate contaminated land? • Minimise the loss of green field land? • Maximise the use of Brownfield land? • Maximise development densities where appropriate?

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Minerals</p> <p>Protecting natural mineral resources.</p> <p>Increased demand for resources as a result of development proposals.</p> <p>Where there are sites permitted or allocated ensure that adverse effects are avoided or minimised and local amenity is protected.</p>	<p>Minerals</p> <p>Ensure the efficient use of minerals and primary resources</p>	<ul style="list-style-type: none"> • Avoid the sterilisation of known minerals reserves? • Promote the appropriate use of primary and secondary aggregates? • Will it make use of previously developed land or buildings?
<p>Energy use</p> <p>Need to keep up to date records of permitted, installed and actual output of renewable energy.</p> <p>Balance of solar panels in areas of conservation where buildings may require extra energy for heating, but visually conflict may arise with historic designations.</p> <p>Consider technology advances that use different collection and storage methods.</p> <p>Reduction of net energy demand with improvements to the build and fabric of new developments.</p>	<p>Energy use</p> <p>To mitigate climate change by minimising carbon based energy usage by increasing energy efficiency and to develop North Northamptonshire 's renewable energy resource, reducing dependency on non-renewable resources</p>	<ul style="list-style-type: none"> • Minimise or reduce energy use? • Promote energy efficient buildings? • Help develop the areas renewable energy resource? • Reduce the dependency on non-renewable resources? • Encourage the development of renewable energy generation schemes (e.g. Wind)? • Encourage community heating schemes or combined heat and power? • Encourage small scale schemes in developments (e.g. Solar)?
<p>Waste</p> <p>The need to reduce the amount of household waste per person.</p> <p>The increase in the number of homes and businesses will be a challenge to reduce the amount of waste generated.</p> <p>The amenity around waste management sites will need to be retained.</p>	<p>Waste</p> <p>To reduce waste arisings and increase reuse, recycling and composting</p>	<ul style="list-style-type: none"> • Promote resource efficient buildings? • Encourage the use of recycled materials? • Reduce the production of waste?

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
<p>Employment</p> <p>Managing broader impacts of major employment developments that are already coming forward; i.e. environmental and social impacts of new developments.</p> <p>Provision of a wide range of job types and industries to ensure resilience.</p> <p>Continue to support employment growth, so as to maximise opportunities to minimise out commuting</p> <p>Support available for those business looking to expand locally. Consider the economic needs of businesses at all levels, from major employers to SMEs.</p>	<p>Employment</p> <p>Maintain and enhance employment opportunities and to reduce the disparities arising from unequal access to jobs</p>	<ul style="list-style-type: none"> • Provide new jobs? • Encourage efficient patterns of movement? • Increase the proportion of knowledge based and high tech businesses? • Sustain and promote jobs in urban and rural areas? • Increase the diversity and quality of employment opportunities in the rural area • Utilise and enhance the existing infrastructure? • Help maintain a transport network that minimises the impact on the environment? • Help sustain existing businesses?
<p>Wealth Creation</p> <p>Support for businesses 3 and 4 years after their inception.</p> <p>Provision of a range of business premises – site allocations of a suitable size and location.</p> <p>Training support for new businesses.</p>	<p>Wealth Creation</p> <p>Retain and enhance the factors which are conducive to wealth creation, including infrastructure and the local strengths and qualities that are attractive to visitors and investors</p>	<ul style="list-style-type: none"> • Encourage enterprise and innovation? • Exploit opportunities for new technologies? • Enhance and promote the image of the area as a business and a sustainable tourist location? • Improve House price/earnings ratio? • Provide enhanced support for new businesses?
<p>Town Centres</p> <p>Impact of Rushden Lakes development on local town centres.</p> <p>Diversification of offer.</p> <p>Increase in night time economy.</p> <p>Creation of destination town centres.</p> <p>Increase in internet shopping.</p> <p>Provision of choice for local residents.</p> <p>Successful delivery of regeneration schemes in some of the town centres.</p>	<p>Town Centres</p> <p>Protect and enhance the vitality and viability of town centres and market towns</p>	<ul style="list-style-type: none"> • Retain and develop a wide range of uses, attractions and amenities? • Ensure good accessibility to and within centres? • Attract continuing investment in development or refurbishment? • Encourage the evening economy? • Encourage increased housing in centres? • Encourage increased visitors through support for tourism, culture and sport?

Key Sustainability Issues	SA Objective	Appraisal guiding criteria (will the proposal...)
Environmental improvements at various scales within the town centres.		
Tourism, culture and sport within the town centres.		
Accessibility from surrounding areas to access facilities		
Mix of uses in the town centres to create vibrant and viable town centres.		

3.3 Consultation on the scope

- 3.3.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁶
- 3.3.2 As such, these authorities were consulted on the SA scope in 2017. Since that time, the SA scope has evolved somewhat as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2017.
- 3.3.3 The SA objectives have been grouped into four broad sustainability themes as done for the JCS, detailed in **Table 3.2** below. This ensures consistency with the approach taken in the SA of the JCS.

Table 3.1: Sustainability themes

Sustainability theme	SA objectives covered	
Social progress which recognises the needs of everyone	• Accessibility	• Community
	• Housing	• Skills
	• Health	• Liveability
	• Crime	
Effective protection of the environment	• Biodiversity	• Cultural Heritage
	• Landscape	• Climate Change
Prudent use of natural resources	• Air quality	• Minerals
	• Water quality/demand	• Energy use
	• Flooding/ natural hazards	• Waste
	• Soil and land	
Maintenance of economic growth and employment	• Employment	• Town centres
	• Wealth creation	

⁶ In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

Part 1: What has plan-making /
SA involved up to this point?

4. Introduction (to Part 1)

- 4.1.1 The ‘story’ of plan-making/SA is told within this part of the SA Report. Specifically, this part of the SA Report describes the following:
- How, prior to preparing the draft Plan, there has been an appraisal of alternative approaches to addressing a range of plan issues; and precisely how the Council took account of these SA findings when preparing the Plan;
 - Why alternatives have not been considered for other plan issues; and
 - How the SA findings have influenced the development of policies in the Publication Draft (Pre-Submission) Plan (i.e. through undertaking assessments before the Plan was finalised).

Identifying and Appraising Alternatives

- 4.1.2 The SEA Regulations⁷ are not prescriptive with regards to what alternatives should be considered. They only state that the SA Report should present an appraisal of the “plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme”.
- 4.1.3 The following chapters describe how, as an interim plan-making/ SA step, alternatives were considered for the following plan issues:
- The amount and distribution of housing and employment land (i.e. the spatial strategy);
 - Oundle
 - Rushden and Irthlingborough
 - Housing in the rural areas;
 - Other plan issues (i.e. policy approaches).

⁷ The Environmental Assessment of Plan and Programmes Regulations 2004

5. Housing and employment growth and distribution

5.1 Introduction

- 5.1.1 The ENLP for East Northamptonshire is being prepared in the context of the adopted North Northamptonshire JCS, which sets the spatial strategy for housing and economic growth across North Northamptonshire. As a key objective, the strategy seeks to increase the self-reliance of North Northamptonshire at all spatial scales. The general approach is to meet needs as locally as possible, recognising that 'higher-order' facilities serving more than one settlement should be the most accessible location (by a choice of a means of transport) for the population served. In the case of East Northamptonshire, this is the growth town of Rushden.
- 5.1.2 The broad settlement hierarchy (JCS Policy 11) seeks to focus development in the growth towns of Corby, Kettering, Wellingborough and **Rushden**, with a more restrained approach to growth in villages and the countryside.
- 5.1.3 The role of the market towns as other important destinations for development following Rushden is also set out in the JCS. This relates to Higham Ferrers, Irthlingborough, Raunds, Thrapston and Oundle.

Housing

- 5.1.4 JCS Policy 28 sets out the distribution of Objectively Assessed Housing Need (OAHN) for the local planning authorities within the Housing Market Area. It states that they will each maintain a rolling supply of deliverable sites to provide 5 years' worth of housing (plus a buffer as required by national policy) and will identify developable sites or broad locations of growth for the rest of the plan period, against the requirements set out in **Table 5.1** below.

Table 5.1: Share of OAHN in the HMA

Local Authority		Annual Average Dwellings 2011-2031	Total 2011-2031
Corby Borough	Requirement	460	9,200
	Strategic Opportunity	(710)	(14,200)
East Northamptonshire District		420	8,400
Kettering Borough		520	10,400
Borough of Wellingborough		350	7,000
North Northamptonshire		1,750 (2,000)	35,000 (40,000)

- 5.1.5 For East Northamptonshire, the required supply of homes to contribute towards housing needs across the HMA is 8,400 over the plan period, equating to 420 dwellings annually.
- 5.1.6 The distribution of the housing requirements between settlements in East Northamptonshire is set out in JCS Policy 29 and replicated in **Table 5.2** below. This reflects their role in the settlement hierarchy (JCS Policy 11) and identified opportunities and constraints.

Table 5.2: Residual housing needs

Settlement	Housing Requirement (2011-2031)	Housing requirement with 10% flexibility allowance	Commitments and completions (2011-2019)	Balance from JCS housing requirement	Balance including 10% flexibility allowance
Rushden	3,285	3,614	2,859	426	755
Higham Ferrers	560	616	674	-114	-58
Irthlingborough	1,350	1485	820	530	665
Raunds	1,060	1,166	1,128	-68	38
Thrapston	680	748	688	-8	60
Oundle	645	710	477	168	233
Rural	820	902	863	-43	39
Totals	8400	9,240	7,509	891	1,732

- 5.1.7 It is the role of the ENLP and/or Neighbourhood Plans to identify non-strategic sites to deliver the housing requirements set out in the JCS. These plans may assess higher levels of housing provision at individual settlements where this meets identified (evidenced) local needs and aspirations or, in the case of Market Towns, would meet a shortfall in deliverable sites at another settlement within the same Part 2 Local Plan area.

Employment

- 5.1.8 JCS Policy 22 (Delivering Economic Prosperity) sets out a target of a net increase of 31,100 jobs across North Northamptonshire during the plan period. The distribution of this target is set out below in **Table 5.3**.

Table 5.3: Job creation targets in the JCS

Local Authority	Net Jobs Growth (in all sectors) 2011-31
Corby Borough	9,700
East Northamptonshire District	7,200
Kettering Borough	8,100
Borough of Wellingborough	6,100
North Northamptonshire	31,100

- 5.1.9 The Council estimates that over 10,500 jobs (i.e. 3,382 in excess of the Joint Core Strategy requirement) will be delivered during the Plan period⁸.
- 5.1.10 Even in a scenario discounting sites where deliverability is uncertain; e.g. Irthlingborough West, Tresham Garden Village, and Nene Park (former Rushden & Diamonds FC stadium site, Irthlingborough), the Joint Core Strategy requirement for 7,200 jobs should be comfortably exceeded, by over 2,200 jobs, providing a significant contingency to cover any potential fallout from macro-economic events such as the Covid-19 pandemic or Brexit.
- 5.1.11 As a result, the Council's approach to the employment strategy is to rely upon development that is already in the 'pipeline'.

⁸ Further details about jobs already delivered together with the trajectory for the remainder of the Plan period are set out in the Jobs background paper (BP5).

5.2 What are the Reasonable Alternatives?

- 5.2.1 As described above, the spatial strategy is set out clearly within the JCS. A range of alternative approaches were appraised in the SA that accompanied the JCS.
- 5.2.2 The ENLP is unable to alter this strategy, and so there are no reasonable alternatives to the broad distribution of housing and employment within East Northamptonshire as a whole or between individual settlements themselves.
- 5.2.3 With regards to growth, the targets within the JCS are the only reasonable starting point. However, it is appropriate to consider the provision of higher amounts of land in order to achieve these targets. These matters are discussed below.

Housing

- 5.2.4 The current housing land supply relative to the requirements of the JCS (as at 31st March 2019) is set out in **Table 5.2** above.
- 5.2.5 This demonstrates that without any allocations, there is a total supply for the District (for 2011-2031) of at least 7,509 dwellings; which leaves a residual JCS requirement of 891 dwellings overall.
- 5.2.6 With a reliance on commitments and completions; the individual housing targets for Higham Ferrers, Raunds, Thrapston and the Rural areas would be exceeded. However, there would be a shortfall for Rushden, Irthlingborough and Oundle.
- 5.2.7 The Council therefore consider it necessary to allocate additional sites in the ENLP Local Plan. In particular, the focus should be on those locations where there are residual needs identified which are Oundle, Rushden and Irthlingborough.
- 5.2.8 The housing supply coupled with proposed allocated sites is set out in table 5.4 below. This is followed by a discussion of reasonable alternatives.

Table 5.4: Housing land supply within the ENLP Local plan (1st April 2019 base date)

Settlement	Housing requirement	Commitments and completions (2011-2019)	Identified brownfield / windfall	ENLP Allocations	Total supply	Balance
Rushden	3,285	2,859	120	450	3,429	+144
Higham Ferrers	560	674	/	0	674	+114
Irthlingborough	1,350	820	207	0	1,027	-323
Raunds	1,060	1,128	/	0	1,128	+68
Thrapston	680	688	/	0	688	+8
Oundle	645	477	/	300	777	+132
Rural area	820	863	/	0	863	+43
Windfall ⁹			493			
Totals	8,400	7,509	820	750	9,142	+742

⁹ Allowance is made of 41 dwellings per year for windfall allowance. Some of this is at identified specific sites that are not allocated (i.e. 120 on brownfield sites in Rushden, and 207 at Irthlingborough). The remainder is assumed to be spread across the remaining settlement and rural areas.

Oundle

- 5.2.9 As outlined above, the Joint Core Strategy identifies a target of 645 dwellings for Oundle, with the presumption that this would be met through the East Northamptonshire Local Plan Part 2 (and / or a Neighbourhood Plan).
- 5.2.10 Taking existing completions, commitments and an allowance for windfall development into account, there is a residual need of 176 dwellings for Oundle¹⁰. However, this would increase to 246 if the allocated sites in the previous Local Plan were excluded from the Supply.
- 5.2.11 To ensure that these needs are met in an appropriate way, the Local Plan seeks to allocate land for housing development. Given that there is a range of site options, it is possible that the housing target could be achieved in a number of ways.
- 5.2.12 The Council explored a range of alternatives for Oundle, and an Interim SA Report was prepared in December 2018 presenting a discussion of the alternatives and the appraisal findings. The content of the Interim SA Report is replicated below.

Strategic alternatives for Oundle

- 5.2.13 The draft Local Plan identifies three sites that are considered suitable for housing development in Oundle to meet identified needs. These sites have been identified through a review of available sites and an assessment of their sustainability. The allocation of these three sites is therefore one strategic approach to development in Oundle.
- 5.2.14 For Option 1 (The proposed approach) a total of 300 homes are proposed at three sites:
- Stoke Doyle Road – around 70 dwellings;
 - Cotterstock Road – around 130 dwellings;
 - St Christopher's Drive – around 100 dwellings.
- 5.2.15 The Council considered alternative site options to help aid the decision-making process. However no other 'strategies' for development were identified as reasonable.
- 5.2.16 Oundle Town Council submitted the Oundle Neighbourhood Plan for examination in May 2019. This proposed an alternative suite of housing land allocations and (for the purposes of this sustainability appraisal) is denoted as "Option 2"; a total of 312 homes are proposed at seven sites:
- Site 19 - Policy 0.19 - Land East of St Christopher's Drive (45 dwellings)
 - Site 20 - Policy 0.20 - Land South of Herne Road (45 dwellings)
 - Site 21 - Policy 0.21 - Millers Field, Benefield Road (12 dwellings)
 - Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road (50 dwellings)
 - Site 23 - Policy 0.23 - Land South of Wakerley Close (10 dwellings)
 - Site 24 - Policy 0.24 - Land North of Benefield Road (120 dwellings)
 - Site 25 - Policy 0.25 - Land East of Cotterstock Road (30 dwellings)
- 5.2.17 No further strategic alternatives have been identified as reasonable.

Summary of effects

- 5.2.18 Table 5.5 below sets out a visual summary of the appraisal findings for the two reasonable alternatives. A detailed appraisal is included at Appendix II

¹⁰ Housing target of 645 minus completions 2011-2018 (384) and commitments (79) = 172 dwellings

Table 5.5: Summary of strategic options for Oundle

SA Topic / Objective	Option 1	Option 2
Accessibility	✘	✘✘
Housing	+++	+ / ?
Health and liveability	+	++
Crime	0	0
Community Value	0	+
Biodiversity	?	?
Landscape	✘	✘✘
Cultural Heritage	0	0
Climate change	0	0
Air quality	✘	✘
Water and natural hazard	✘	✘
Soil and land	✘	✘✘
Minerals	0	0
Energy use and waste	0	0
Employment, skills and wealth creation	+	+?
Town centres	+	+

- 5.2.19 The two strategic options perform relatively the same across the range of sustainability topics. This is not unsurprising given that they are in the same settlement, propose similar levels of growth (though option 2 could require additional development), and involve some of the same sites (albeit different boundaries).
- 5.2.20 For both options, neutral effects are predicted for a range of factors, including; minerals, energy use and waste, crime, climate change and cultural heritage.
- 5.2.21 Minor negative effects arise for both options with regards to air quality, water and natural hazards. These issues are more relevant at a settlement scale and pose no particular issue for either approach.
- 5.2.22 For other factors, some differences in the two options can be noticed. In particular, Option 2 is likely to generate more prominent negative effects with regards to the efficient use of land, effects on landscape character and accessibility. However, none of these effects are likely to be significant if mitigation measures are secured as proposed.
- 5.2.23 From a positive perspective, each option would have similar benefits with regards to the creation of jobs in construction, an injection of spending into the local economy and town centres, and through wealth creation. However, differences are noted between the approaches for three SA topics. For housing, the Local Plan approach (Option 1) provides a more deliverable approach, and the scale of developments would be better placed to support infrastructure improvements and affordable housing. Therefore, it would have significant positive effects.
- 5.2.24 This contrasts with Option 2, which proposes several sites with deliverability issues that could prevent significant positive effects from being generated. This is quite a critical issue.
- 5.2.25 Where Option 2 does perform more favourably though is in the likely generation of greater positive effects (than option 1) with regards to community development (given that the approach has been developed by the 'community', and in terms of health and liveability).

Individual site assessments

- 5.2.26 The Council undertook individual site assessments to understand the suitability of site options in Oundle, and how they perform in general sustainability terms. These assessments helped to understand sites on an individual basis, which also contributed to the identification of reasonable 'packages of sites' (as described above).
- 5.2.27 The site assessment methods and findings are set out in two separate evidence documents.
- Oundle Background Paper, November 2018: www.east-northamptonshire.gov.uk/downloads/file/11974/background_paper_-_assessment_of_alternative_site_options
- DLP Site Assessment Paper (July, 2019): www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potential_development_sites_in_oundle_july_2019
- 5.2.28 SA is supposed to be proportionate and avoid duplication. If the assessment criteria and methods take account of the SA Framework and employ suitable, consistent methods, then it is perfectly appropriate to rely upon these site assessments (rather than undertake separate / further assessments specifically for the SA).
- 5.2.29 The site assessment framework utilised by the Council (in the Oundle Background Paper) is the same as that established for the JCS and has been used widely to support the appraisal of sites across north Northamptonshire. A range of criteria are used that overlap considerably with the SA Framework, and therefore this approach is considered to be suitable.
- 5.2.30 Full details of the approach and the findings can be found in the background paper. The findings are summarised below at table 5.6.
- 5.2.31 The DLP Reassessment Paper (July 2019), provides an independent view on the site assessment process, building on the Council's earlier appraisals.
- 5.2.32 The updated assessment matrix identifies 30 assessment criteria, which cover the full range of sustainability criteria. The report also states explicitly, that the methodology was developed taking account of and linking to the SA Framework used in the NNJCS and the ENLP SA processes.
- 5.2.33 The findings of this site assessment for shortlisted sites is also summarised below with brief commentary. Full details can be found in the separate report linked above.

Table 5.6: Site appraisal matrices for Oundle

reference		capacity	Deliverability	Availability	Impact on the stock of minerals	Impact on the quality of agricultural land	Impact on the use of previously developed land	Impact on flood risk	Impact on the existing form of the settlement	Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens	Impact on heritage	Impact on visual landscape	Impact on the development or a protected species or on a site recognised for its wildlife or geological importance	Impact on biodiversity	Impact of the development on neighbouring land uses	Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development.	Impact on existing sports and recreation facilities	Impact of an existing notifiable installation, including pipelines, on the development	Ease of utility provision	Capacity of highway network	Access infrastructure	Connectivity to existing urban area	Proximity to trunk/principal road junction	Proximity to services	
LPP2S A7	LAND AND BUILDINGS AT 153 GLAPTHORN ROAD OUNDLE																								N/A
LPP2S A44	Rays Field ^{3*}																								Un-known
LPP2S A64	Land off Glapthorn Road, Oundle*																								Un-known
LPP2S A117	Parcel fronting Cotterstock Road (land within Oundle Primary School grounds)*																								Un-known
LPP2S A218	Land at St Peters Road																								49

reference		capacity	Deliverability	Availability	Impact on the stock of minerals	Impact on the quality of agricultural land	Impact on the use of previously developed land	Impact on flood risk	Impact on the existing form of the settlement	Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens	Impact on heritage	Impact on visual landscape	Impact on the development of a protected species or on a site recognised for its wildlife or geological importance	Impact on biodiversity	Impact of the development on neighbouring land uses	Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development.	Impact on existing sports and recreation facilities	Impact of an existing notifiable installation, including pipelines, on the development	Ease of utility provision	Capacity of highway network	Access infrastructure	Connectivity to existing urban area	Proximity to trunk/principal road junction	Proximity to services
LPP2 SA219	Land at Milton Road (Oundle Town Cricket Club)	59																						
LPP2 SA220	Land north of Benefield Road	355																						
LPP2 SA221	Land either side of Herne Rd inc School	352																						
LPP2 SA222	Land east of St Christopher's Drive	95																						
LPP2 SA223	Land West of Cotterstock Road	124																						
LPP2 SA224	Land off Stoke Doyle Road	200																						
LPP2 SA225	Land off Cotterstock Road and St Peters Road North	87																						
LPP2 SA241	Land South of Benefield Rd/Wakerley Close	167																						
LPP2 SA242	Land Between 22 and 24 Benefield Road	15																						

capacity	20
Deliverability	
Availability	
Impact on the stock of minerals	
Impact on the quality of agricultural land	
Impact on the use of previously developed land	
Impact on flood risk	
Impact on the existing form of the settlement	
Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens	
Impact on heritage	
Impact on visual landscape	
Impact on the development of a protected species or on a site recognised for its wildlife or geological importance	
Impact on biodiversity	
Impact of the development on neighbouring land uses	
Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development.	
Impact on existing sports and recreation facilities	
Impact of an existing notifiable installation, including pipelines, on the development	
Ease of utility provision	
Capacity of highway network	
Access infrastructure	
Connectivity to existing urban area	
Proximity to trunk/principal road junction	
Proximity to services	
reference	LPP2 SA250
	Dairy Farm, Stoke Hill

Table 5.7: Summary of DLP site scores for Oundle

Site	Overall Score	Rank
'Ray's Field'	-14	10
Land West of Glaphorn Rd	-23	12
Land off Oundle Primary School, Cotterstock Rd	-15	11
Land off Benefield Rd	20	2
Land either side of Herne Rd	-12	9
Land South of Herne Rd	8	5
Land off St Christopher's Drive	22	1
Land West of Cotterstock Rd	-5	8
Land off Stoke Doyle Rd	12	4
Land East of Cotterstock Road / North of St Peter's Road	17	3
Land South of Benefield Road / Wakerley Close	6	7
Dairy Farm, Stoke Hill	7	6

- 5.2.34 The three sites proposed for allocation all perform relatively well in comparison to the alternatives against the full range of assessment criteria (ranking 1st, 3rd and 4th).
- 5.2.35 One site performs well that has not been proposed for allocation. This is Land off Benefield Road. The DLP assessment (July 2019) found that the site scored favourably in terms of overall sustainability. This is largely due to the relative lack of development constraints affecting this site; e.g. the site is in a single ownership with no significant potential barriers to development.
- 5.2.36 However, the site is not considered to be achievable, when compared to the three sites put forward by the District Council (Option 1). All of these have been subject to active engagements with a nominated housebuilder/ developer and are all at an advanced stage within the development management process. Furthermore, while the Benefield Road site is relatively unconstrained, there are concerns that this does not relate well to the wider built form at the western edge of the urban area.
- 5.2.37 For these reasons, the Benefield Road site has not been proposed for allocation, despite its favourable scoring in the DLP assessment.

Rushden and Irthlingborough

- 5.2.38 As a key growth town, the Council consider that unmet housing needs (especially in Rushden itself) ought to be focused to this location in the first instance.
- 5.2.39 There are several locations for growth / development opportunities that could exceed the unmet needs for Rushden and also for the District overall. However, with reduced delivery at Irthlingborough East SUE, the Council also considered it important to explore whether appropriate growth opportunities exist in Irthlingborough to address shortfalls in that settlement.
- 5.2.40 To deal with these matters together, the Council considered a number of possible further directions for growth around Irthlingborough and Rushden.
- 5.2.41 The following locations at Irthlingborough and Rushden (lying within the East Northamptonshire area) were identified as reasonable alternatives and subsequently assessed as potential site options for growth:
- North of the A6, Irthlingborough;
 - North and East of Crow Hill, Irthlingborough;
 - East of Higham Ferrers (slaters lodge)
 - South East of Rushden; and
 - West of Rushden Lakes.
- 5.2.42 Using an established site appraisal methodology linked to the SA Framework, the Council undertook a sustainability appraisal of each site on a consistent basis.
- 5.2.43 The findings are summarised in table 5.8 below, with full details set out in a Background Paper taken to Planning Committee on the 17th December 2019. https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning_policy_committee
- 5.2.44 As a result of the appraisal process, the Council discounted Irthlingborough as a suitable location for growth for the following reasons:
- The adopted spatial development strategy (Joint Core Strategy Table 1/ Policy 11) and paragraph 9.10, directs that there're is a sequential approach to identifying locations for additional development; i.e. this should be directed towards the Growth Town (Rushden) in the first instance; and
 - Of the two alternative sites assessed at Irthlingborough, neither of these compared favourably to those at Rushden.
- 5.2.45 One preferred site was identified at this stage at Rushden Lakes West. The justification at this stage was as follows:
- Rushden East was favoured as a proposed site allocation, due to its proximity to a wide range of services, facilities and green infrastructure.
- 5.2.46 Following consultation on the draft Plan, concerns were raised by Natural England and the Local Wildlife Trust with regards to the Rushden Lakes West site. In summary, this related to the potential for significant effects on the Upper Nene Valley Gravel Pits SPA, and the need to apply a precautionary approach.
- 5.2.47 In response the Council undertook further targeted work to address concerns raised in relation to biodiversity. As well as gathering further evidence about the likely impacts of growth at Rushden Lakes West, several alternative locations within Rushden were included in a site assessment process.

5.2.48 These sites are identified below.

- Rushden Lakes West
- Rushden South East “Northern” option – land surrounding 170-184 Newton Road
- Rushden South East “Infill” option – linear growth between A6 roundabout and 250 Newton Road;
- Rushden South East “Southern” option – land east of the A6 Bypass/ west of John White Golf Club, Bedford Road. Land to the east of Rushden/Higham Ferrers
- Land west of Slater’s Lodge, Newton Road, Rushden/Higham Ferrers

5.2.49 The findings of the assessment are set out in table 5.9 below and discussed briefly. Full details of the methodology and the justification for scores are set out in the separate background document.

Assessment of alternative site options – Rushden Growth Town (September 2020).
www.east-northamptonshire.gov.uk/downloads/file/11974/background_paper_-_assessment_of_alternative_site_options

5.2.50 In addition to the site assessment process, detailed assessment of the site options from a purely HRA perspective was undertaken by AECOM.

5.2.51 Taking all the evidence into account, the Council identified a new preferred approach to land allocation in Rushden. This is the site allocated in the Plan at Bedford Road.

- The site achieved the highest overall ranked scoring in the assessment of alternative site options; and
- The site is being actively promoted and has few development constraints; e.g. single ownership, ease of access and its situation beyond the Upper Nene Valley Gravel Pits SPA/ Ramsar site 3km buffer zone.

Table 5.8 Appraisal summary for Rushden and Irthlingborough site options

Site	Other matters	Planning Policy	SHLAA category Or equivalent estimate	Deliverability	Availability	Impact on the stock of minerals	Impact on the quality of agricultural land	Impact on the use of previously developed land	Impact on flood risk	Impact on the existing form of the settlement	Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens	Impact on heritage	Impact on visual landscape	Impact on the development of a protected species or on a site recognised for its wildlife or geological importance	Impact on biodiversity	Impact of the development on neighbouring land uses	Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development	Impact on existing sports and recreation facilities	Impact of an existing notifiable installation, including pipelines, on the development	Ease of utility provision	Capacity of highway network	Access infrastructure	Connectivity to existing urban area	Proximity to trunk/principal road junction	Proximity to services
Land North of the A6, Irthlingborough																									
Land North and East of Crow Hill, Irthlingborough																									
Land to the East of Higham Ferrers																									
Rushden South East																									
Rushden Lakes West																									

Table 5.9: Site summary of focused Rushden sites appraisal

Site		Proximity to services	Proximity to trunk/principal road junction	Connectivity to existing urban area	Access infrastructure	Capacity of highway network	Ease of utility provision	Impact of an existing notifiable installation, including pipelines, on the development	Impact on existing sports and recreation facilities	Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development.	Impact of the development on neighbouring land uses	Impact on biodiversity	Impact of the development on a protected species or on a site recognised for its wildlife or geological importance	Impact on visual landscape	Impact on heritage	Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens	Impact on the existing form of the settlement	Impact on flood risk	Impact on the use of previously developed land	Impact on the quality of agricultural land	Impact on the stock of minerals	Availability	Deliverability	SHLAA category Or equivalent estimate	Planning Policy	Other matters
1	Land surrounding 170-184 Newton Road	Yellow	Green	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Red	Red	Green	Yellow	Red	Green	Yellow	
2	Linear growth between A6 roundabout and 250 Newton Road	Yellow	Green	Red	Yellow	Red	Yellow	Green	Green	Yellow	Red	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Red	Red	Green	Yellow	Red	Green	Yellow	
3	Land east of the A6 Bypass/ west of John White Golf Club, Bedford Road	Yellow	Green	Yellow	Green	Yellow	Yellow	Green	Yellow	Yellow	Green	Green	Yellow	Green	Yellow	Green	Yellow	Green	Red	Red	Green	Green	Red	Green	Green	
4	Land west of Slater's Lodge, Newton Road, Higham Ferrers	Red	Yellow	Red	Red	Yellow	Yellow	Green	Green	Yellow	Green	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Red	Red	Yellow	Green	Red	Red	Yellow	

5.3 Unreasonable Alternatives

5.3.1 Several alternatives were considered by the Council, but ultimately determined to be unreasonable. These are discussed below.

Reliance upon commitments, completions and windfall for housing delivery

5.3.2 It would seem reasonable to assume that the ENLP Local Plan should only set out to meet the housing and employment targets within the JCS. There is a relatively high level of committed development and coupled with further development opportunities identified on brownfield sites, and an allowance for windfall, the shortfall overall for the District would likely be small.

5.3.3 However, East Northamptonshire needs to demonstrate that a 5-year supply of housing can be provided, as well as allowing for flexibility and choice to ensure that the 8,400 homes do indeed come forward within the Plan period.

5.3.4 The inclusion of additional supply, acting as a contingency is considered to provide choice and flexibility if there are any delays in housing delivery, particularly at SUEs. The NPPF also requires a positive and proactive approach in relation to housing delivery, especially in the short term.

5.3.5 As discussed in Paragraph 5.26, such an approach would also not meet the individual housing targets for Rushden, Irthlingborough and Oundle set out in the JCS.

5.3.6 The Council therefore consider this approach to be unreasonable.

Provide a higher housing flexibility allowance

5.3.7 To increase flexibility further, and prepare for beyond the plan period, the choice and amount of housing sites could be increased further. However, this approach is considered to be unreasonable for the following reasons:

- The preferred approach already provides land to accommodate an additional 249 dwellings above the JCS target for the district. This rises to 749 when taking account of unspecified windfall development.
- There is no evidence currently to suggest that higher levels of delivery are necessary to achieve the JCS targets or to secure a 5-year supply of housing.
- Neighbourhood Plans have the ability to deliver higher levels of growth in specific locations if deemed appropriate. There is a strong history of Neighbourhood Plan activity in East Northamptonshire.
- Larger strategic levels of growth above 500 dwellings would be of a strategic level, which would need to be addressed through the review of the strategic plan (the JCS).

Increased growth in Higham Ferrers, Raunds and Thrapston

5.3.8 The Council determined that it would not be reasonable to address residual needs for the District at these three settlements. Primarily, this is because the JCS targets are already likely to be exceeded in these locations, and there are options for growth in Rushden that should be considered in the first instance (given the focus of the JCS and the shortfall in this location and Irthlingborough). Furthermore, the shortfalls relate to Rushden and Irthlingborough, whereby alternative additional sites should be considered at these two urban areas, in the first instance.

5.3.9 There are further settlement specific issues that the Council took into consideration when concluding that growth here was not a reasonable approach to take.

- Higham Ferrers – Contrary to the spatial development strategy, which directs additional growth to Rushden; the nearby designated Growth Town;
- Raunds – Accommodating significant quantum of growth; further housing land allocations would be likely to place undue pressure upon local infrastructure and give rise to potential saturation of the housing market;
- Thrapston – Significantly distant from Rushden and Irthlingborough; it is questionable whether additional development at this town could sustainability offset the shortfalls for these two urban areas in the south of the District. The Plan area is defined by two distinctive sub- areas; to the north and south of the A14 (Joint Core Strategy, Figure 15).

Increased housing growth in ‘rural areas’?

- 5.3.10 The Council determined that it would not be reasonable to focus additional growth at the smaller settlements or rural areas to help increase choice, flexibility and establish a 5-year supply. This approach has already been tested through the SA for the JCS and was discussed in detail at the Examination hearings. Such an approach would not be in accordance with the JCS, which seeks to focus growth in the most sustainable settlements. Growth in the villages and rural areas should only be supported where it cannot be delivered at a higher-order settlement. A sufficient quantity of sites is available in Rushden and the Market Towns to support increased growth in sustainable locations; so, directing growth to the rural areas, which generally support fewer services and facilities, is not considered to be appropriate.
- 5.3.11 Furthermore, there are other sources of supply in the rural area that will supplement the rural allocations and windfall allowance. This includes rural exceptions and the potential for housing to be delivered through neighbourhood plans (of which there are currently 16 rural Parishes designated as Neighbourhood Plan Areas, including 7 Plans successfully “made” to date). Each of these will provide the opportunity to identify locally specific needs and establish an appropriate approach to the delivery of such needs.

Propose additional employment land allocations

- 5.3.12 The Council considered whether there is a need to provide additional employment land allocations (of a range of types) at a level beyond that proposed in the ENLP Local Plan. However, this approach was considered unreasonable for several reasons, and has therefore not been appraised in the SA.
- 5.3.13 With regards to logistics development, the district has already satisfied its need for strategic distribution employment land (based on the job forecasts included in the JCS) and does not need to allocate more land. Furthermore, it is considered that this matter is better explored in the future as part of a Joint Core Strategy Review.
- 5.3.14 There is already a significant evidence of ‘oversupply’ across all sectors, including smaller development sites. There is no evidence to suggest that further allocations are required to increase choice and flexibility even further.

5.4 Why has the Preferred Approach been selected?

- 5.4.1 The ENLP (Part 2) applies the adopted spatial strategy at the District level. This maintains a focus for additional development at Rushden (the designated Growth Town), while recognising a need to ensure sufficient growth to fulfil the development targets for those urban areas with residual housing land shortfalls (Rushden, Irthlingborough and Oundle).

6. Housing growth and distribution in rural areas

6.1 Introduction

- 6.1.1 The target for the 'rural areas' of East Northamptonshire set out in the JCS is 840 dwellings. This includes smaller villages and areas in the open countryside (where development should be carefully managed). The strategy determines that the scale of development in an individual village (other than small scale infill opportunities) should be led by locally identified employment, housing, infrastructure and service requirements, and dependent upon the form, character and setting of the village and its proximity to larger settlements.
- 6.1.2 The JCS also states that opportunities for development to meet specific local needs may be identified through Neighbourhood Plans or the Community Right to Build.
- 6.1.3 The JCS recognises the need for restraint in rural areas in North Northamptonshire. Policy 3 of the JCS states that development should be located in such a way that is sensitive to its landscape, to retain and if possible, enhance the distinctive character of the area. The JCS suggests that villages that have a sensitive character or conservation interest are to be identified, and new development will be strictly managed.

6.2 What are the Reasonable alternatives?

- 6.2.1 The JCS seeks to deliver 820 new homes in the rural area of East Northamptonshire to support sustainable development. Between April 2019 and the start of the plan period in April 2011 there have been a total of 513 homes completed with a further 261 granted planning permission. There is also a supply associated with sites allocated in Made Neighbourhood Plans (90 dwellings) and emerging plans / opportunity sites (89 dwellings). In total, this supply will exceed the JCS requirement; leaving a 'surplus' of 43 dwellings.
- 6.2.2 The Council have estimated that windfall development will contribute 820 dwellings to the district housing supply, of which a proportion would be expected to come forward across the rural areas. Therefore, the surplus for the rural areas is likely to be slightly higher than 43 dwellings, offering some flexibility.
- 6.2.3 It was decided that a higher flexibility allowance does not need to be set for the rural areas for several reasons:
- It is possible for Neighbourhood Plans to secure higher levels of growth in response to locally identified needs. Indeed, there is evidence in 'made' and 'emerging' Neighbourhood Plan's within the district that indicative housing targets for those villages will be exceeded.
 - Additional rural exception sites can be delivered to address affordable housing needs that are not met by market housing. JCS Policy 30 will ensure that a proportion of developments of 11 or more dwellings or where the area exceeds 1,000m² will provide a percentage of affordable housing. Beyond that, the Council will work with parish councils and partners to explore options for rural exception sites in accordance with JCS Policy 13 to meet local needs and aspirations.
- 6.2.4 With regards to windfall development, the evidence (from past trends) suggests that each of the individual settlements is likely to experience this form of development. Therefore, for settlements where no allocations are made, this does not mean that no further growth whatsoever would occur. The Council therefore considers that there are no alternatives relating to the split of growth that should be allocated to specific settlements in the rural area.

6.3 Unreasonable Alternatives

Allocate sites in the rural areas to provide added flexibility

- 6.3.1 An alternative approach would be to allocate additional sites to meet rural housing needs rather than relying upon committed growth and an element of windfall development (which is less certain). This might be appropriate if there was a question mark over the continued contribution of pipeline and windfall development in the rural settlements. However, the Council considers that these sources will continue to make a sufficient contribution to rural housing needs, as demonstrated by past trends.
- 6.3.2 The allocation of additional housing land within the rural areas is not considered a reasonable alternative. It is considered that this would be contrary to the adopted spatial development strategy (Joint Core Strategy Policy 11/ Table 1). Furthermore, the proposed Tresham Garden Village development makes provision for additional growth, over and above the 820 dwellings Joint Core Strategy requirement. Neighbourhood planning also provides a further opportunity to accommodate additional sustainable levels of growth within the rural areas. The seven made Neighbourhood Plans make provision for additional growth within the rural areas, with up to a further 9 Plans at various stages of preparation.

6.4 Why has the Preferred Approach been selected?

- 6.4.1 As explained in Chapter 5, in accordance with the focus on growth towns within the JCS strategy any additional growth should be directed to the main settlement of Rushden and the higher order settlements of Irthlingborough, Higham-Ferrers, Raunds, Oundle and Thrapston.
- 6.4.2 It is considered unnecessary to provide a higher level of land supply for housing in the rural areas (than that being proposed through committed growth and windfall).

7. Alternatives for other plan issues

7.1 Introduction

- 7.1.1 Thematic planning policies (for example, to consider issues such as 'design' and 'environmental protection') can be prepared on the basis of a robust evidence base without the need to rigorously assess a series of options as part of the SA at each stage of policy development.
- 7.1.2 A range of options are often presented at an early stage to invite input from stakeholders on what approaches they would prefer. This is a useful exercise, but it is not always productive or necessary to undertake detailed sustainability appraisal on such 'options'. Rather, the SA framework can be used to help guide policies as they develop, so that the principles of sustainability are 'frontloaded'. SA can then be used more purposefully to inform policy approaches at a later stage of plan development when there is more policy detail (i.e. the 'preferred options').
- 7.1.3 For these reasons, it has not been considered necessary or proportionate to undertake an assessment of alternative policy approaches relating to the following issues (which are primarily covered by the JCS and were appraised during the development of this plan):
- Design;
 - Environmental protection;
 - Climate change;
 - Infrastructure provision; and
 - Town centres.
- 7.1.4 Many potential options for themes are 'procedural' in nature, covering issues such as whether a specific topic should be considered in the plan, or how a policy area should be dealt with (i.e. as part of a general policy, or several specific policies). These are not distinct options that would result in significantly different outcomes with regards to the effects on sustainability. Therefore, they are not considered to be reasonable alternatives.

Part 2: What are SA findings at this current stage?

8. Introduction (to Part 2)

- 8.1.1 The aim of this chapter is to present an appraisal of the Publication Draft (Pre-Submission) Site Specific Part 2 Local Plan for East Northamptonshire, as currently published under Regulation 19 of the Local Planning Regulations (2012).

8.2 Methodology

- 8.2.1 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the sustainability topics/objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.2.2 It is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.¹¹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/accessibility).
- 8.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline and (in particular) the future baseline. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In some instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.
- 8.2.4 It is important to clarify some of the assumptions that have been made in predicting the effects. The following are some key factors that have been taken into account in the assessment process:
- When determining the effect of policies (Publication Draft (Pre-Submission)) it is important to compare them to the baseline policy position. In the absence of a Local Plan, development would still need to show general compliance with the NPPF/ PPG. Therefore, policies that simply repeat the principles set a national level would not be predicted to have a significant effect. To generate a significant effect, it would be expected that policies add locally specific detail and requirements.
 - Although some policies could have a negative effect when viewed in isolation, other plan policies could mitigate these effects.
 - As is the case, overall effects could be predicted to be neutral, but it will be made clear which policies are assumed likely to mitigate effects.
 - The JCS sets the context and strategy for much of the ENLP. This means the strategic principles for development are already established, and ought to be taken into account when determining the further effects that the ENLP Local Plan could have. If policy approaches are established in the JCS and the ENLP Local Plan cannot add any meaningful local context, then the effects are broadly assumed to be neutral. Furthermore, if effects have already been determined in the JCS for a particular policy or site, then these effects will generally not be attributed to the ENLP Local Plan. The prediction of effects will examine the additional effects that the ENLP Local Plan could have compared to the JCS alone. For example, site allocations in the JCS could have negative or positive effects.

¹¹ Environmental Assessment of Plans and Programmes Regulations 2004

- These have already been identified in the JCS and are not attributable to the ENLP Local Plan. However, where the Plan adds further detail or site-specific policies, then this raises the potential for effects.
- Unless positive changes to the baseline would occur as a result of the ENLP Local Plan, then effects are predicted to be neutral. Prevention of negative effects means that the plan would ensure a neutral effect on the baseline (unless the baseline position would have deteriorated in the absence of the Plan and so policies could be predicted to have a positive effect).
- The majority of committed development that forms part of the Plan strategy is expected to be delivered. Therefore, the appraisal of effects is mainly concentrated on the additional development that the ENLP Local Plan seeks to deliver, local policy details and how this interacts with committed development (including allocations and relevant policies within the JCS).

8.3 Presenting findings

- 8.3.1 The appraisal of the Plan is set out in Chapters, one for each of the SA objectives.
- 8.3.2 To give the appraisal structure, the policies in the plan have been set out according to the chapters of the ENLP and a commentary on the likely effects is given.
- 8.3.3 The Plan must be appraised 'as a whole', and so each chapter concludes with an overall assessment of the Plan policies in combination. This is important, because Plan policies work with one another, and could offset or mitigate certain effects and also lead to synergistic effects.
- 8.3.4 Therefore, the discussion in this part of the SA Report summarises the cumulative / synergistic effects of the policies together within specific sections of the draft Plan to deliver a proportionate and robust approach to communicating the effects of the draft Plan (which should be appraised 'as a whole').
- 8.3.5 **Table 8.2** below sets out the key sections and policies within the draft (Pre-submission) ENLP Local Plan.

Table 8.1: ENLP Local Plan sections and policies

Section	Policy
Spatial Development Strategy	Policy EN1: Spatial Development Strategy
	Policy EN2 Settlement Boundaries: Urban Areas
	Policy EN3: settlement boundaries: Freestanding villages
	Policy EN4: Settlement boundaries: Ribbon developments
	Policy EN5: Development on the periphery of settlement with a defined settlement boundary
	Policy EN6: Replacement Dwellings in the Open Countryside
Natural Capital	Policy EN7: Green Infrastructure corridors
	Policy EN8: The Greenway
	Policy EN9: Designation of local green space
	Policy EN10: Enhancement and provision of open space
	Policy EN11: Enhancement and provision of sport and recreation facilities
Social Capital	Policy EN12: Design of buildings
	Policy EN13: Designated Heritage assets
	Policy EN14: Non-Designated Heritage Assets
	Policy EN15: Tourist and Cultural Developments
	Policy EN 16: Tourist accommodation
	Policy EN17: East Northamptonshire Enterprise centre
Economic Prosperity	Policy EN18: Development of Commercial space to support economic growth
	Policy EN19: Protected Employment Areas
	Policy EN20: Relocation and/or expansion of existing businesses
	Policy EN21: Town centres and primary shopping frontages
	Policy EN22: Impact test thresholds for retail development
	Policy EN23: Development of main town centre uses around the local centres
Housing Delivery	Policy EN24: Oundle housing allocations
	Policy EN25: Stoke Doyle Road, Oundle
	Policy EN26: Cotterstock Road, Oundle
	Policy EN27: St Christopher's Drive, Oundle
	Policy EN28: Land east of the A6/ Bedford Road, Rushden
	Policy EN29: Delivering wheelchair accessible housing
	Policy EN30: Housing mix and tenure to meet local need
	Policy EN31: Older people's housing provision
	Policy EN32: Self and custom build housing
Supporting SUEs	Policy EN33: Rushden East Sustainable Urban Extension
Town Strategies	Policy EN34: Reimagining Town Centres – guiding principles
	Policy EN35: Splash Pool and Wilkinson site redevelopment
	Policy EN36: Former factory site, between 71 Oakley Road and 37-51 Washbrook Road, Rushden
	Policy EN37: Rectory Business Centre, Rushden
	Policy EN38: Federal Estates/ former Textile Bonding factory site, Newton Road/ Midland Road

Section	Policy
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	Policy EN39: Former Select & Save, 13-21 High Street/ St Peter's Way Car Park, Irthlingborough
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	Policy EN40: Former Rushden and Diamonds FC Stadium site, Nene Park, Diamond Way,
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	Policy EN41: Riverside Hotel, Station Road, Oundle
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	Policy EN42: Cattle Market, Market Road, Thrapston
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9. Appraisal of the ENLP

9.1 Introduction

- 9.1.1 As introduced above, the aim of this chapter is to present an appraisal of the ENLP Local Plan against the SA framework. The appraisal is structured by each of the SA Objectives.

9.2 Accessibility

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

Spatial Development Strategy

- 9.2.1 The spatial strategy defined by Policy EN1 leads on from the adopted JCS and continues to direct most development to the main urban areas in the District, as the most accessible locations. Furthermore, the settlement hierarchy identifies rural outliers, restraint villages and open countryside areas, which lack access to local services and facilities and where development is restricted to appropriate uses. On this basis, the spatial strategy is deemed to support accessible new development and minor long-term positive effects are considered likely.
- 9.2.2 Policies EN2 and EN2 are likely to support minor positive effects, requiring infill to be well related to the urban area, and restricting development to small-scale infill in smaller villages. Developments could also help to improve accessibility if they involve enhancements to walking and cycling links.
- 9.2.3 Policy EN4 is likely to have neutral effects on balance. On one hand, development in these areas is unlikely to have a full range of accessible services, and so allowing growth here is not positive in terms of accessibility. However, conversely, new developments will be required to have access to the highways without creating backland developments. There would also be access to public transport.
- 9.2.4 Policy EN5 is likely to have an indirect minor positive effect by restricting development in less accessible areas compared to defined settlements. Development that is allowed would mostly be existing buildings and would serve a specific purpose.
- 9.2.5 Policy EN6 deals with replacement dwellings, and therefore, there is unlikely to be any difference in terms of accessibility.
- 9.2.6 Overall, the spatial development strategy policies are likely to support minor long-term positive effects, particularly by directing growth to the most accessible areas of the District and restricting growth in less accessible areas.

Natural Capital

- 9.2.7 Policy EN7 could have a minor positive impact in terms of the amount of people walking and cycling (which the creation of green infrastructure may encourage). However, there is no reference to the form of green infrastructure or that it should help to improve travel links. Therefore, the effects are uncertain. It would be helpful to clarify that links should be multifunctional and promote active travel. Of benefit is also the connection of local open space, which should allow access to recreation locally. Seeking to make links to the existing network from new areas should also help to create stronger links across the District.
- 9.2.8 Policy EN8 could potentially have significant positive effects in terms of accessibility as it is a new piece of infrastructure that will bring a long walking/cycling route from the north of East Northamptonshire to the south, creating links along the way. It will give greater opportunities for people to be connected to the natural environment and potentially use

these routes as an alternative means of travel. Development will be expected to contribute towards the delivery and enhancement of the route.

- 9.2.9 Together, Policies EN9, EN10 and EN11 are likely to have minor positive effects on accessibility by improving access to local open space and sport and recreational opportunities. Policy EN10 in particular seeks to ensure that accessibility standards are met for open space, which should help to reduce the need to travel farther afield to access such facilities.
- 9.2.10 Overall, the natural capital policies are likely to support significant long-term positive effects, predominantly through the introduction of The Greenway as a potential new active travel link north-south through the District. Connecting new and improved open spaces with new development further supports positive effects, giving residents good access to recreational opportunities.

Social Capital

- 9.2.11 Policy EN12 seeks to ensure that development supports healthy lifestyles, including by creating an accessible public realm that encourages physical activity. Minor positive effects are therefore anticipated.
- 9.2.12 Policies EN13 – 15 are predicted to lead to neutral effects, with a focus on design aspects and the protection and enhancement of historic and cultural assets. With regards to street design, Policy EN13 could be enhanced by stating that development needs to ensure that there are accessible routes which enable and encourage walking and cycling.
- 9.2.13 Policy EN16 supports tourist development, particularly along the Nene Valley and Rockingham Forest areas. These areas are accessible by car, and to an extent by public transport. The effects on accessibility are therefore unlikely to be significantly different to the baseline situation. With regards to the reuse of disused buildings for conversion to B&B accommodation, this is likely to encourage car usage, but the magnitude of effects would be very small. Overall, neutral effects are considered likely. It may be beneficial to include a clause that seeks to ensure that new attractions are accessible by public transport, to ensure that they do not rely upon private car usage too heavily.
- 9.2.14 Policy EN17 allocates land for development of a new school at Higham Ferrers, which will boost local accessibility and walkable journeys to key educational facilities. Significant positive effects are considered likely in this respect.
- 9.2.15 Overall, the social capital policies are considered likely to support significant long-term positive effects, predominantly through the allocation of land for a new school in Higham Ferrers, supporting local access and walkable daily trips. Further positive effects are anticipated through positive design aspects, such as improvements to the public realm which can encourage active travel.

Economic Prosperity

- 9.2.16 Policy EN18 supports the development of accessible new commercial space which delivers “pedestrian, cycle and public transport connections to adjacent businesses, residential areas and public open spaces” and is likely to lead to minor positive effects in this respect.
- 9.2.17 Policy EN19 will have neutral effects on accessibility as access to existing employment areas would remain the same. Acceptable changes of use would not likely generate any significant changes in terms of accessibility but would need to be considered for housing development.
- 9.2.18 Policy EN20 is also predicted to have neutral effects on accessibility. Expansion of existing business areas would draw more people to these areas, which are broadly accessible. This would be largely a continuation of current trends though, rather than leading to any improvements. With regards to relocation, sites would need to be suitable and certain requirements. Therefore, accessibility is likely to be adequate.

- 9.2.19 Policy EN21 is likely to lead to a minor positive effect in relation to accessibility as it seeks to support a range of facilities in the town centre that are easily accessible to people. The effects are unlikely to occur in the short term, but the policy should help to contribute to stronger town centres in the longer term. Improving connectivity is also positive to encourage walking from surrounding residential areas. However, effects are not significant, as car use would still be expected to dominate.
- 9.2.20 Applying the impact test is positive in terms of access, as it discourages out of town facilities that are less accessible. The application of the test is standard practice, and so Policy EN22 has minimal effects in this respect. However, by setting relatively low thresholds, this means that more potential out of town developments would be captured and perhaps avoided, which is a minor positive effect.
- 9.2.21 Policy EN23 is likely to have a minor positive effect on accessibility, as it supports a range of services and facilities around existing local centres. It also seeks to improve connectivity between surrounding residential areas. The effects would be relatively minor, as the number of people changing their retail habits would not be anticipated to be substantial.
- 9.2.22 Overall, the economic prosperity policies are considered likely to lead to minor long-term positive effects, by supporting accessible economic growth and discouraging out of town facilities which are less accessible.

Housing Delivery

- 9.2.23 Policies EN24 – EN27 are concerned with allocations for housing in Oundle. Policy EN24 sets out the overall principles for development, one of which involves the need to address any transport impacts such as cycle links, pedestrian links and vehicle access.
- 9.2.24 Stoke Doyle Road and St Christopher's Drive are located on the outskirts of the town, and therefore do not have ideal accessibility to services on foot. However, both are approximately 1km from the town centre, which provides a school, retail, public transport links and other local services. Site specific requirements seek to ensure that pedestrian links are provided at both. However, these are links to existing networks rather than enhancements. Increased walking and cycling to access services and employment is therefore unlikely. However, at St Christopher's Drive, there would be recreational access to the Nene Way and adjacent villages such as Ashton, Barnwell and Polebrook: which is a minor positive effect.
- 9.2.25 Cotterstock Road is located to the north, further away from the town centre. In this respect, it does not perform as well in terms of walking and cycling links to local services. However, there is a primary school very close by, and good links to recreational opportunities.
- 9.2.26 The Land east of the A6 Bypass in Rushden does not perform as well in terms of walking and cycling links to local services, however, there are educational facilities and recreational opportunities nearby. The A6 Bypass presents an obstacle to safe pedestrian movement which will need to be considered in development. In response Policy EN28 identifies the need "maximise opportunities to improve connectivity to, and enhance the quality of, the public rights of way network" including "providing pedestrian and cycle connections to the surrounding urban area". Furthermore, the Policy requires that proposals be informed by a Transport Assessment approved by the Highway Authority.
- 9.2.27 Policy EN30 is related to mix and tenure and therefore will have no effect on accessibility. Likewise, Policies EN31 and EN32 are more about the type of housing to be allowed on sites, rather than locational factors. Therefore, the effects are neutral.
- 9.2.28 For Policy EN31, there is a specific need for older persons accommodation to have good access to public services and transport, which is beneficial with regards to accessibility. Policy EN29 will also directly improve accessibility in homes for those using wheelchairs. Therefore, minor positive effects are predicted.
- 9.2.29 Overall, the housing delivery policies are predicted to have neutral effects in terms of accessibility. Whilst there are some minor positive effects associated with public rights of way and management of traffic impacts, the development is unlikely to secure a major

change in the travel patterns and access to services for new residents. There are also some site-specific issues at development locations that might discourage walking and cycling.

Delivering Sustainable Urban Extensions

- 9.2.30 The Rushden East SUE leads on from the strategic directions of the JCS and is expected to deliver a range of uses on site, including housing, employment, retail, a new local centre, two new schools, new and improved strategic footpath connections, new 'super crossings' creating vehicle, cycle and pedestrian connections from John Clark Way roundabout and Newton Road roundabout, new GI corridors and links, and new parkland. The delivery of the site will ultimately support high levels of accessibility, and improved links for existing nearby residents.
- 9.2.31 Policy EN33 reinforces the requirements on-site and draws upon the emerging evidence that will guide development at the site, expecting development to "be developed as a sustainable place providing a range of opportunities and services that support meeting local needs on a daily basis." The additional policy protections are considered likely to lead to minor long-term positive effects.

Town Strategies

- 9.2.32 Policy EN34 is likely to have a minor positive effect on accessibility for several reasons. It supports enhanced pedestrian links within town centres and to surrounding areas, which is a key element of the accessibility SA Objective. Its principles should also help to reverse the decline of town centres and make them more attractive for visitors. Given that the town centres are generally more accessible by public transport, and do not necessarily rely on private cars (such as out of town retail parks), this is positive with regards to accessibility. There is support for a 'mix of uses', which could potentially include housing, but a more explicit support for housing would also be beneficial.
- 9.2.33 Policy EN35 allocates the Splash Pool and Wilkinson site. Development of this site will lead to accessible housing in the town centre, with pedestrian links being secured between the high street and Eaton walk. This will promote permeability between new housing and the high street; which is a minor positive effect.
- 9.2.34 Policy EN36 will likely have a minor positive effect with regards to accessibility as the site is in a wider residential area close to the town centre. This means pedestrian pathways; road infrastructure and bus routes are already in place that can be used. There may also be improvements to such infrastructure to make the area slightly more accessible. For example, there is a new public space proposed which will give residents the opportunities to access recreational activities.
- 9.2.35 Policy EN37 is likely to have a minor positive effect as it promotes accessible housing development close to the town centre. The policy also seeks to improve permeability and walking and cycling links to the surrounding areas and the town centre.
- 9.2.36 Policy EN38 is likely to have minor positive effect on accessibility as it would help to improve connectivity between allocated housing to the east and the town centre to the west. Furthermore, the site is close to a school, which would enable more journeys to be taken on foot by residents.
- 9.2.37 Policy EN39 is likely to have a minor positive effect with regards to accessibility as it supports town centre uses, which could help to attract people into the town centre. Furthermore, it could lead to accessible housing in the form of live work units and should also help to enhance permeability through pedestrian access.
- 9.2.38 Policy EN40 is predicted to have minor positive effects with regards to accessibility as it seeks to strengthen pedestrian and cycle links and provide riparian access in employment, cultural and tourism development. Development will also benefit from pedestrian and cycle connections to the East Northamptonshire greenway.

- 9.2.39 Policy EN41 is likely to have neutral effects on accessibility due to the proposed uses such as hotel or public house being on the edge of Oundle in a location that is likely to be accessed by car. Whilst there is some potential for improvement to cycle and pedestrian links to the town, this is offset by the relatively inaccessible location of the site.
- 9.2.40 Policy EN42 is likely to have minor positive effects as the development site is in a well-located area with access to services in the town centre. Proposals to improve pedestrian and cycle routes to other parts of the town are also proposed.
- 9.2.41 Overall, the additional development of housing, employment and town centre uses proposed through the town strategies policies are considered likely to lead to minor long-term positive effects. Predominantly as a result of development in accessible locations and policy provisions which seek to enhance pedestrian and active travel links.

Cumulative / overall effects

- 9.2.42 In combination, the plan policies could generate **significant positive effects** in terms of accessibility. The Plan supports the strategic proposals of the adopted JCS, particularly through directing development to the most accessible locations and supporting enhanced connections both within and beyond the District. Cumulative positive effects can also be anticipated through the strategic and local planning of GI routes that extend the East Northamptonshire Area to create more accessible active travel routes.

9.3 Housing

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

Spatial Development Strategy

- 9.3.1 The spatial development strategy defined by Policy EN1 reinforces the approach laid out by the JCS to deliver the required housing needs over the Plan period. It identifies the settlement hierarchy commensurate with the capacity of each settlement to support further growth.
- 9.3.2 Policies EN2 – EN6 are restrictive to housing in one respect but are also positive by allowing suitable development that is appropriate to different settlements. The effects are unlikely to be significant from a district wide perspective given that the scale of development and number of homes involved would be minor. These policies are predicted to have minor positive effects or neutral effects. Minor positive effects are also anticipated as a result of provisions for rural exception schemes (Policy EN5) that target particular housing needs (including affordable housing needs)
- 9.3.3 Overall, the support for housing development in the most appropriate and connected places are considered likely to lead to minor long-term positive effects.

Natural Capital

- 9.3.4 Policies EN7 and EN8 are predicted to have neutral effects. Whilst they will add to the cost of development through the requirement for contributions to green infrastructure enhancement, this would be unlikely to affect the viability of schemes. Furthermore, green infrastructure enhancements ought to make residential developments more attractive, which could help with marketability.
- 9.3.5 Policies EN9 – EN11 are predicted to have minor positive effects, as they should ensure that new communities have suitable access to local greenspace, and recreational facilities. Though contributions would be sought for open space provision, this is fairly standard practice and would not be expected to have significant effects in terms of viability.

Social Capital

- 9.3.6 Policies EN12 and EN13 are unlikely to affect the provision of housing, though good design would ensure that accommodation is comfortable and affordable for residents.
- 9.3.7 Policies EN14 and EN15 are predicted to have uncertain effects with regards to housing provision. As great weight is given to conservation, this could make certain housing developments inappropriate. However, it should be possible to deliver most schemes if they are well designed and sympathetic. Therefore, the effects would not be expected to be significant in any case with regards to housing provision.
- 9.3.8 Development for tourism will have no effect on housing, as it would be on sites that are already in existence or at locations most likely to be unsuitable for housing. With regards to tourist accommodation, the conversion from dwellings or underused buildings is unlikely to have any effect on housing provision, as there would still be residents living at the accommodation. Neutral effects are therefore anticipated in relation to Policy EN16.
- 9.3.9 Policy EN17 will support communities with enhanced access to local educational facilities with minor indirect benefits expected in terms of marketability and affordability.
- 9.3.10 Overall, the social capital policies are considered likely to lead to minor long-term positive effects, predominantly through the promotion of connected and accessible residential development supported by high quality design and place making principles.

Economic Prosperity

- 9.3.11 Policy EN19 would have neutral effects, as it seeks to maintain the current situation with regards to employment land. This is appropriate as it helps to ensure that housing development is located in suitable areas that would not be affected by amenity concerns.
- 9.3.12 Policies EN18 and EN20 are likely to have neutral effects on housing as they relate to the small-scale economic development, or expansion or relocation of already established employment land. Policies EN21 – EN23 are focused on town centre uses and retail provision, so are of limited relevance to housing. Appropriate new town centres uses, including new housing, is explored further within the town strategies section.
- 9.3.13 On the whole, the economic prosperity policies are likely to lead to neutral effects in relation to this SA objective.

Housing Delivery

- 9.3.14 The proposed housing allocations (Policies EN24 – EN28) seek to address the outstanding residual housing requirements for Rushden, Irthlingborough and Oundle and are likely to lead to significant positive effects in this respect. The policies propose broadly sustainable locations and in Oundle, the amount of growth involved exceeds identified residual needs, so providing a degree of flexibility. The scale of sites means that they will contribute positively to affordable housing and should allow for a mix of housing types and tenures.
- 9.3.15 Policy EN29 supports the provision of 5% Category 3 (wheelchair accessible) housing in all new housing development, directly benefitting residents with specific needs.
- 9.3.16 Policy EN30 supports the provision of different housing types and tenures to support identified local needs. In particular, it focuses on housing for an ageing population and housing for higher income groups, which are known areas of shortage. Consequently, a minor positive effect is predicted.
- 9.3.17 Together, Policies EN31 and EN32 contribute to minor positive effects on housing by providing support for specific groups. For example, older persons needs are particularly referenced, which is positive given the prevalence of this age group, and custom build housing will give people the opportunity to build houses that meet their specific needs.

- 9.3.18 Overall, the additional housing land allocations alongside policies supporting the development of the right types and tenures to support resident needs are considered likely to cumulatively support significant long-term positive effects in relation to the SA objective.

Delivering Sustainable Urban Extensions

- 9.3.19 The Rushden East SUE provides a significant contribution to meeting housing needs in the District, as determined through the adopted JCS. The additional provisions of Policy EN33 identify the aspirations to deliver 2,700 new homes alongside supporting uses that deliver sustainable growth and provides the site boundaries. The continued commitment to the delivery of the SUE in the Plan is considered for potential minor long-term positive effects in this respect.

Town Strategies

- 9.3.20 The town strategy policies seek to identify appropriate growth and uses at key town centre regeneration sites. This includes an element of housing provision (Policies EN36, EN37 and EN38) that supports long-term minor positive effects overall, particularly by means of highly accessible development supporting the needs of certain groups.

Cumulative / overall effects

- 9.3.21 The Plan provides additional support in meeting the housing needs of the wider HMA as determined through the JCS. Cumulative **significant positive effects** are therefore anticipated.

9.4 Health and Liveability

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

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

Spatial Development Strategy

- 9.4.1 The spatial development strategy leads on from the directions of the JCS, providing for most growth in the main urban centres in the District, and restricting growth in the open countryside. The policies identify the use of settlement boundaries to provide limits to development. This continues to support growth within main urban areas which are generally better connected to services, facilities and recreational opportunities. It also allows urban areas to maintain their connections with the surrounding countryside, which provides a significant recreational resource supporting positive health outcomes. The current pandemic brings the importance of high levels of accessibility into acute focus.
- 9.4.2 Overall, the spatial development strategy policies are considered likely to lead to minor long-term positive effects for health and liveability.

Natural Capital

- 9.4.3 The natural capital policies seek to protect and enhance green infrastructure resources (including open space) and maximise network connectivity. In particular, the identification of and inward investment proposed for new GI corridors and priority routes, including The Greenway (Policies EN7 and EN8), are considered likely to bring about multiple benefits including for health and liveability. The GI routes provide a connected network of provisions enabling access to recreational opportunities, active travel routes and scenic routes. This will ultimately support the health and wellbeing of residents and encourage physical activity. Seeking to maximise connectivity across the District will also provide support in reducing disparities between different groups and different areas.
- 9.4.4 Policies EN9 – EN11 are also likely to support positive health outcomes given the emphasis on increasing and protecting green and open space availability in the District, as well as improving access to playing pitches. The current pandemic highlights the importance of high levels of local access to open space and recreational areas which support social distancing, and the health implications could be considered further through design aspects in the open space policies to enhance positive effects.
- 9.4.5 Overall, the policy provisions seek to enhance GI resources in the District, including access to recreational areas and active travel routes with the aim to provide a comprehensive network across the District and connect to open spaces. As a result, significant long-term positive effects are anticipated.

Social Capital

- 9.4.6 Policy EN12 specific seeks development proposals which “demonstrate that design will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimising any negative health and wellbeing impacts”. To achieve this, provisions are outlined which seek to effectively apply place shaping principles, enhance access, promote active travel opportunities, and consider the impacts of growth on healthcare services and access. Of note, the policy requires early undertaking of Health Impact Assessments proportionate to the scale of development. Place shaping principles and design considerations are further identified through Policy EN13 which provide support for accessible development and amenity space.
- 9.4.7 Whilst the policy provisions for the historic environment, tourism development and a new school (Policies EN14 – EN17) are unlikely to lead to any direct or significant effects, it is recognised that they contribute in part to maintaining and enhancing settlement identities,

which can indirectly support inclusive communities and social wellbeing, and enhance residential amenity.

- 9.4.8 Overall, the direct policy provisions for design proposals which support healthy outcomes is considered for significant long-term positive effects. However, in light of the recent pandemic, it is recognised that Plan policies could introduce measures that seek to ensure that places are well designed in the context of allowing social distancing, access to greenspace, and alternative ways of working and interacting.

Economic Prosperity

- 9.4.9 The economic prosperity policies seek to protect existing employment areas and provide sufficient flexibility for businesses to grow in the District. Support is also provided for enhancing the role and function of town centres. Whilst no significant effects are anticipated in relation to health and liveability, it is recognised that the policies contribute to place making, seeking accessible employment opportunities and town centre/ local centre services and facilities which support healthy environments and relatively self-contained communities. Indirect minor positive effects are therefore considered likely overall.

Housing Delivery

- 9.4.10 Policies EN24 – EN28 seek to meet the residual outstanding housing needs for Oundle, Rushden and Irthlingborough. This will support the residents in accessing their housing needs and minor indirect benefits can be drawn in relation to physical, mental and social wellbeing.
- 9.4.11 Furthermore, development in Oundle (Policy EN24) is expected to deliver active travel opportunities such as cycle links pedestrian links, there should be provision for biodiversity gains and landscaping which are likely to support positive health and liveability outcomes.
- 9.4.12 There is potential for health impacts in development adjacent to the A6, however Policy EN28 requires appropriate boundary treatment to provide the necessary mitigation for noise and air pollution impacts arising from the bypass. Alongside the provisions of Policy EN12 (discussed above), residual neutral effects are considered likely.
- 9.4.13 Policies EN29 – EN32 seek to influence the mix, types and tenures of homes being provided in the District, ensuring that specialist groups such as elderly and mobility impaired groups can access their housing needs. Further flexibility is also provided through provisions for self and custom builds. This will provide direct health benefits for residents, supporting a range of high-quality homes that support wellbeing and reduce disparities, and overall significant long-term positive effects can be anticipated in this respect.

Delivering Sustainable Urban Extensions

- 9.4.14 The Rushden East SUE is likely to bring about attractive communities that are well served by facilities, open space and recreation opportunities. Policy EN33 supplements the corresponding JCS policy, bringing the policy requirements into practice through the development of a masterplan framework. This increases the certainty of positive effects being secured here.

Town Strategies

- 9.4.15 Policy EN34 will likely have a positive impact on health and wellbeing by seeking to enhance pedestrian connectivity from residential and employment areas to the town centre. The policy also mentions public realm improvements to create better quality space for users which ought to have benefits for wellbeing.
- 9.4.16 Policies EN35, EN36 and EN37 will likely have a minor positive impact on health and wellbeing through the provision of public space and pedestrian connectivity. For those who live nearby or use these areas regularly, there could be positive effects on mental health as the area is made more aesthetically pleasing.

- 9.4.17 Policy EN38 is likely have minor positive effects on health and liveability due to part b of the stating that contributions towards open space and green infrastructure are a requirement. There will also be linkages from the school/residential areas to the urban extension and town centre which could provide opportunities for people to use active modes of travel.
- 9.4.18 Policy EN40 could have minor positive effects on health and liveability due to the policy stating in part d and e there will be improved cycle arrangements and connectivity. The physical improvement of the site should also create a more attractive environment for people to experience.
- 9.4.19 Policy EN42 is likely to have some minor positive effects on health and liveability as Parts d and b discuss ways to open up areas of the site to allow pedestrian access.

Cumulative effects

- 9.4.20 As a whole, the plan is likely to bring **significant positive effect** with regards to health and accessibility. This should be achieved through numerous facets of the plan including the provision of affordable and specialist housing, regeneration in areas needing investment, the creation and enhancement of open space, green infrastructure, and the promotion of active travel and accessibility to key services.

9.5 Crime

SA Objective: To improve community safety, reduce the incidences of crime and fear of crime – a safe place to live

Spatial Development Strategy

- 9.5.1 Policy EN1 follows on from the provisions of the JCS in supporting a settlement hierarchy and directing most growth to the most accessible areas of the District. The strategy seeks to support the growth of integrated communities (particularly by restricting rural and isolated development) that is likely to indirectly benefit this SA objective.
- 9.5.2 Policies EN2 – EN6 are not likely to have direct effects upon crime, as they are concerned with the form of settlements rather than specific design measures. Having said this, allowing infill development could help to minimise areas of vacant land and provide affordable housing. Development may also present an opportunity to design out crime, but this would not be a result of these particular policies.
- 9.5.3 Any effects would be more likely in the urban areas rather than villages and ribbon developments, as the levels of crime are generally lower here. Despite these potential indirect benefits, the policies are predicted to have broadly neutral effects on crime.

Natural Capital

- 9.5.4 Together, these policies could contribute a minor positive effect to the reduction of crime by supporting the creation of routes that are more attractive to users.
- 9.5.5 This would help to increase perceptions of safety. The achievement of positive effects would however be reliant upon good design, which seeks to reduce crime.
- 9.5.6 These policies could have a minor positive effect in the longer term by providing diversionary activities for potential offenders. However, there is a need to ensure that open spaces and community facilities are well designed so that there is natural surveillance and reduced opportunities for crime (for example ensuring security at sports facilities, and lighting).

Social Capital

- 9.5.7 Policies EN12 and EN13 could have a minor positive effect by ensuring that developments are well designed, permeable and promote natural surveillance. However, these factors are not mentioned explicitly and so the effects would not be significant.
- 9.5.8 Policies EN14 and EN15 are predicted to have neutral effects on crime as they are concerned with the protection and enhancement of heritage and culture rather than reducing crime. However, improving the appearance and condition of buildings and places could potentially improve feelings of safety in settlements (particularly town and village centres).
- 9.5.9 Policy EN16 is predicted to have neutral effects on crime. Whilst increased tourism could bring jobs (which can be a positive factor in the reduction of crime), it could also increase opportunities for crime relating to tourists. However, public realm improvements should also help to reduce crime. On balance the effects are neutral.
- 9.5.10 Policy EN17 is predicted to have neutral effects on balance, though it is recognised that school development could contribute to increased levels of natural surveillance.
- 9.5.11 Overall, indirect minor positive effects are considered likely as a result of health and design policies that seek improved connections and permeability alongside measures which may contribute to increasing natural surveillance.

Economic Prosperity

- 9.5.12 Policies EN18 – EN20 are concerned primarily with employment development. This is positive with regards to the provision of employment (which is influential in reducing crime). However, effects are indirect and would likely only occur in the longer term. In addition, policy EN18 would encourage alternative uses for sites that are lying unused for long periods of time. This could be beneficial with regards to improving the appearance of employment areas and reducing anti-social behaviour. Overall, minor positive effects are predicted.
- 9.5.13 Policies EN21 – EN23 all see to improve the vitality and vibrancy of town centres and / or local centres. By doing so, towns should have more active frontages, greater occupancy of buildings, more natural surveillance and greater footfall. These things should all help to reduce crime in centres, which are often a hotspot for crime and anti-social behaviour. Consequently, minor positive effects are predicted.

Housing Delivery

- 9.5.14 Development at these sites is unlikely to lead to an increased incidence of crime either in the short term or the longer term. During construction, there could be potential for onsite anti-social behaviour out of working hours, but a site management plan would help to minimise this. Once completed, new communities would be as susceptible to crime as any other area within Oundle (not more or less). The developments could be designed to improve community safety. Therefore, neutral effects are predicted.
- 9.5.15 Policies EN29 – EN32 are predicted to have neutral effects with regards to crime as they are focused on the delivery of certain types of housing rather than their design or layout as such.

Delivering Sustainable Urban Extensions

- 9.5.16 Similar to the previous housing allocation policies, development at the Rushden East SUE is unlikely to lead to an increased incidence of crime either in the short term or the longer term. During construction, there could be potential for onsite anti-social behaviour out of working hours, but a site management plan would help to minimise this. Once completed, new communities would be as susceptible to crime as any other area within Rushden (not more or less). The developments could be designed to improve community safety. Therefore, neutral effects are predicted.

Town Strategies

- 9.5.17 Policy EN34 sets the guiding principle for town centre redevelopment, with a focus on increasing footfall, diversifying uses and improving the public realm. These factors should all contribute positively to community safety. The particular site opportunities identified could have specific local benefits. For example, each of the sites seek to improve public realm and promote better pedestrian links.
- 9.5.18 The redevelopment of vacant or underused buildings at some of the sites should also help to reduce crime and antisocial behaviour by minimising the 'broken windows' effect¹². On this basis, minor long-term positive effects are predicted overall.

Cumulative / overall effects

- 9.5.19 The regeneration of key town centre sites may contribute to improved community safety and reduce the perception of crime in the district to the benefit of the wider HMA. However, no significant cumulative effects are considered likely. Therefore, overall, a **minor positive effect** is predicted in relation to crime.

¹² James Q. Wilson, George L. Kelling (1982) The Police and Neighbourhood Safety: Broken Windows (*The Atlantic Monthly*)

9.6 Community

SA Objective: Value and nurture a sense of belonging in a cohesive community whilst respecting diversity.

Spatial Development Strategy

- 9.6.1 The spatial development strategy defined by Policy EN1 and supported by Policies EN2 – EN6 leads on from the strategic directions of the JCS to define the settlement hierarchy and direct growth to the most accessible locations in the District. This is likely to benefit communities in the long-term in terms of settlement identity and social cohesion by promoting development in areas with established communities. The restrictions on isolated development in the countryside will also positively support cohesive and inclusive communities. Furthermore, it is anticipated that Neighbourhood Plans would be prepared to guide new settlement boundaries, which would directly achieve increased community engagement. As a result, minor positive effects are predicted.

Natural Capital

- 9.6.2 Together, these policies should have minor positive effects by supporting the enhancement of greenspace, leisure and other recreational facilities, including access to these areas. Communities can use such facilities and spaces for events, and also as a general form of interaction, recreation or active travel. More attractive places can also foster good community relations and improve feelings of safety. Increased access to natural and open spaces will support growing communities, the importance of which has been highlighted through the current pandemic.

Social Capital

- 9.6.3 Policies EN12 and EN13 should support community cohesion, as they seek to ensure development is high-quality and in keeping with the character of the surrounding area.
- 9.6.4 Policies EN14 and EN15 are predicted to have minor positive effects on community value as they seek to protect buildings of historic and cultural value. Such buildings often form a key part of communities (for example churches, pubs, community centres) and therefore it is important to ensure they are valued. Despite the importance of historic assets, the policy is not predicted to have significant effects, as the current policy context already offers strong protection (at least for designated assets).
- 9.6.5 Support for increased tourist attractions under Policy EN16 is likely to support communities with increased opportunities for inward investment and improved access to recreational facilities. As a result, minor indirect positive effects are considered likely.
- 9.6.6 Additional education facilities in Higham Ferrers as allocated through Policy EN17 is considered for positive effects by supporting communities with increased local access to educational facilities and supporting walkable daily trips.
- 9.6.7 Overall, minor long-term positive effects are anticipated as a result of measures to improve local accessibility to educational facilities in Higham Ferrers, supporting walkable neighbourhoods, as well as high quality design proposals which seek to enhance the quality of the built environment.

Economic Prosperity

- 9.6.8 Policies EN18 - EN20 support small scale commercial opportunities or business expansions that are likely to provide local value, particularly in terms of accessibility to employment opportunities.
- 9.6.9 Policies EN21 – EN23 are predicted to have minor positive effects, as they would help to improve the appearance and usage of town and local centres. Ensuring that centres are well connected to the surrounding area should also help to foster increased footfall. Town centres often provide locations for community events, so it would be positive to create accessible, attractive spaces. The creation of dedicated spaces for performances and

events would be positive and could possibly be sought through these policies as an enhancement measure.

- 9.6.10 Overall, minor long-term positive effects are considered likely as a result of accessible employment opportunities and improved town centres supporting vibrant local communities.

Housing Delivery

- 9.6.11 Policies EN24 – EN28 are predicted to have uncertain effects. On one hand, development will help to support the local population, and could bring with its improvements to local facilities and services. Furthermore, development could help to increase the amount of affordable housing and meet the specific needs of certain social groups such as the elderly.
- 9.6.12 However, on the other hand, certain residents could be resistant to development, and perceive it to have negative effects on community value. In particular, development adjacent to the cemetery in Oundle, could lead to temporary disturbance to visitors.
- 9.6.13 Policies EN29 – EN32 support an appropriate mix of housing to meet identified local needs. This should have minor positive effects by helping people remain in their communities, as well as encouraging mixing from different social groups.

Delivering Sustainable Urban Extensions

- 9.6.14 The Rushden East SUE is allocated through the JCS, so effects associated with development are largely attributable to the Part 1 Plan. There is a commitment to creating an SPD that sets out how a 'bespoke residential character' will be achieved at the SUE. This could involve measures to ensure that new communities are cohesive and have a sense of identity. No detail is included in the Part 2 Plan though so neutral effects are recorded.

Town Strategies

- 9.6.15 Policy EN34 ought to have a positive effect by seeking to enhance the appearance and usage of town centres, which are often a hotspot for crime. Building upon this, the site-specific policies provide some direction as to how key town centre sites ought to be redeveloped. For several sites, there is a focus on improving the public realm, and pedestrian links, which should have benefits. In particular, EN35 and EN36 seek to create a public square, which would be beneficial for community groups.
- 9.6.16 Policies EN37 and EN38 discuss new schools, a mix house of housing types to meet community needs and public realm improvements.
- 9.6.17 Policy EN39 discusses the enhancement of heritage assets which may be of community value as well as having a mix of shop uses which support local interaction.
- 9.6.18 Policy EN40 supports the regeneration of the former Nene Park football stadium site. Employment uses, culture and leisure are most likely, given the potential flood risk. Depending on the new uses, there could be some value for communities. Given the history of the site, it might be appropriate to explore whether reference can be made to Nene Park / Rushden and Diamonds, so as to remember the legacy of the football club (which was important to members of the community).
- 9.6.19 Policies EN41 and EN42 will likely have a positive effect as the proposals for these sites are proposals that will be positive for community value such as retail, food and drink venues as well as enhancing heritage assets and historical buildings.

Cumulative / overall effects

- 9.6.20 Overall, the Plan is likely to lead to **some minor positive effects** with regards to community cohesion.
- 9.6.21 Several policies support the protection and enhancement of facilities that can be used by communities, and there is a focus on accessibility and improvement to the public realm.

- 9.6.22 Whilst new development could be opposed by certain people, it could also create new communities with an identity their own. Ensuring that housing needs are met across the district will also help to support the vitality of settlements.

9.7 Skills, employment and wealth creation

SA Objective: To improve overall levels of education and skills

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

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

Spatial Development Strategy

- 9.7.1 Policy EN1 sets out a spatial strategy which includes growth and economic development in all urban areas according to the settlement hierarchy. The policy further supports opportunities for rural diversification in smaller villages. This should help the establishment of small-scale enterprises in rural areas such as farm shops, cafes or tourism/ recreational uses, providing new employment opportunities for local people and services in these areas. Overall, a minor positive effect is predicted.
- 9.7.2 Policies EN2 - EN5 set out settlement boundaries. Restricting development not associated with agricultural and other countryside uses should safeguard such uses and businesses which are often less financially viable compared to some other uses such as housing. However, these effects are not predicted to be significant as the protection of countryside areas is pre-established in national planning policy. Policy EN3 does not support residential infill development on sites with existing employment use detached from the main built-up area of villages. This is likely to help safeguard these uses from pressures for residential redevelopment, although the effects are likely to be of a small scale. Policy EN6 does not directly relate to the skills, employment and wealth creation objectives. Overall, Policies EN2 – EN6 are predicted to have neutral effects overall.

Natural Capital

- 9.7.3 Improvements to green infrastructure and natural capital should help support wealth creation by creating high quality natural environments and recreational spaces which should make the district more attractive to skilled workers, visitors and investors. These are minor positive effects.
- 9.7.4 Policy EN11 requires strategic employment development to provide on-site provision or make contributions towards off-site provision of sport and recreation. Whilst this may have implications for viability, no significant negative impacts are predicted in terms of wealth creation.
- 9.7.5 Overall, the natural capital policies are considered likely to lead to minor positive effects.

Social Capital

- 9.7.6 Policies EN12 - EN15 seek to encourage good design and the conservation of heritage assets. A high-quality townscape should increase vitality and the viability for economic development which could indirectly support the generation of employment opportunities and facilitate wealth creation. However, effects are predicted to be neutral on the objectives as these policies make a nominal contribution to a wider array of issues central to these objectives.
- 9.7.7 Policy EN16 supports the delivery of tourism-related development including accommodation and cultural assets in the Nene Valley corridor and Rockingham Forest areas. Supporting the growth of important tourism-related facilities should help job growth and wealth creation

by attracting investment through a pro-development policy context. A minor positive effect is predicted for the employment and wealth creation objectives.

- 9.7.8 Policy EN17 allocates a site for the development of a new school and supports the creation of sports and recreational hub which should provide additional educational capacity in the southern part of the district and thus is predicted to have a significant positive effect in relation to the skills objective. These effects are also predicted on the employment and wealth creation objectives, as enhancements to the provision of education would improve the skills of the local population supporting the growth of business including knowledge-based and value-added sectors and should support a cycle of wealth creation.
- 9.7.9 Overall, significant positive effects are anticipated as a result of the new school allocation supporting educational attainment in the District, and the promoted growth of the tourism sector.

Economic Prosperity

- 9.7.10 Policies EN18 and EN20 support the development of employment space for small businesses and expanding businesses. These policies are predicted to have positive effects on the employment objective but are not likely to lead to significant effects when compared to the baseline position.
- 9.7.11 Policy EN19 seeks to protect existing employment areas from non-employment uses. Requirements for non-employment development in employment areas to demonstrate the site or building is unsuitable for employment use; with no real prospect for reuse, and to make development contributions to support economic development elsewhere in the district, should help protect and support the creation of new and appropriate employment space. This is predicted to have a positive effect on the employment object and a minor positive effect on wealth creation.
- 9.7.12 Policies EN21 - EN23 seek to enhance town centre and local centres including their roles as hubs for employment. These policies are likely to have positive effects on the employment object and minor positive effects for wealth creation. Whilst requirements for impact tests for retail uses outside of primary retail areas could undermine the delivery of retail space outside of town and retail centres. This is not predicted to have adverse effects as the policy approach is broadly consistent with national planning policy, the policy seeks to safeguard important existing retail areas. The policy also has some flexibility to ensure it does not restrict unmet viable uses.
- 9.7.13 Overall, the economic prosperity policies are considered likely to lead to minor long-term positive effects through the policy provisions which seek to protect core established business areas and allow for appropriate economic expansion outside of the strategic allocations of the JCS. Positive effects are also anticipated through the strengthening of town centre roles and function.

Housing Delivery

- 9.7.14 These policies allocate a number of sites for housing and seek to influence the type and tenure of future housing. The delivery of new housing should provide short term local employment opportunities and minor positive effects in this respect. Similarly, minor positive effects are predicted in relation to the skills objective for Policies EN25 - EN28 as these allocations could potentially attract developers and trades companies supporting any associated training programmes or apprentice opportunities for skilled labour and providing opportunities for onsite training for local people.
- 9.7.15 There is sufficient capacity (or this can be made so through enhancements) in terms of schools in Oundle and Rushden to support new development. Therefore, neutral effects are likely in this respect.

Delivering Sustainable Urban Extensions

- 9.7.16 Policy EN33 is likely to have similar effects in terms of housing delivery to the housing delivery policies. The allocation of two primary schools and for land to be reserved for a

secondary school is predicted to have a significant positive effect on the skills objective, as this should help ensure adequate educational provision for new housing development and avoid additional pressures on existing provision. Safeguarding land for a secondary school should further ensure that when the need arises the land resource is available to provide important secondary schooling provision. It should be noted that these elements have already been established through the JCS though, and so the effects are not directly attributed to the ENLP.

- 9.7.17 The policy sets out requirements for employment development and retail which should help deliver new employment opportunities and reduce pressures on existing employment provision from new residents. In this regard a uncertain minor positive effect is predicted in relation to the employment objective. The effects are uncertain as the policy does not quantify the amount or set out the types of employment uses which will be delivered other than retail), and leaves this to a masterplanning exercise.

Town Strategies

- 9.7.18 Policy EN34 seeks to secure outcomes to enhance the vitality and viability of town centres. The policy is predicted to have significant positive effects in relation to the employment objective as outcomes such as increasing footfall and social interactions, improvements to the retail, leisure and cultural offer, and enhancements to the accessibility, public realm and townscapes, should help create the environment required to stimulate economic growth. This could further translate to the generation of a range of new employment opportunities. To a lesser extent, these effects are likely to result in wealth creation, especially through promoting town centres for business and tourism, and thus positive effects are also predicted for the wealth creation objective.
- 9.7.19 Policy EN35 seeks to encourage the redevelopment of a key town centre site which is likely to include uses which generate permanent employment such as retail and office use whilst safeguarding the existing leisure use by requiring development proposals to address the loss of the facility. The redevelopment of the site is also likely to help unlock the economic potential of the town centre which should support further regeneration and associated employment growth and wealth creation. Therefore, the policy is likely to have a positive effect in relation to the employment and wealth creation objectives. The relocation of the leisure facility has potential to result in enhancements to the existing provision which could improve training facilities and opportunities for swimming and other sports. However, these effects are uncertain.
- 9.7.20 Policies EN36 - EN38 allocates former employment sites for residential use. Discouraging employment uses on less suitable sites should avoid the oversupply of less desirable employment floorspace which could undermine the viability for new floorspace in more suitable and desirable locations. Supporting the agglomeration of employment uses such as in town centres or in designated areas should further help achieve the economies of scale and create suitable environments to support the demand and generation of further employment. This could subsequently make positive contributions towards wealth creation and the generation of new employment opportunities can support skills development. However, the loss of former employment land resource to residential use proposed by these policies is likely to result in minor negative effects on the employment objective.
- 9.7.21 Policies EN39 - EN42 allocate a number of brownfield sites for employment use. These policies are predicted to have positive effects on the employment objective by providing important land resources and policy context to encourage employment-related development. Depending on the nature of new development, this is predicted to have positive effects but to a lesser extent on wealth creation and skills development.
- 9.7.22 Overall, both positive and negative effects are predicted as a result of the town strategies which seek both new employment and retail development, but also propose the loss of some existing employment land to housing development. On balance, the positive effects outweigh the negatives as the net effect in terms of jobs creation ought to be positive. A focus on the growth town of Rushden could also help to tackle inequalities, which are more prevalent in this settlement.

Cumulative effects

- 9.7.23 The plan sets out a strategy to deliver economic development throughout the district with a focus on protecting and enhancing town centres and existing employment areas. The plan further seeks to provide new educational provision in the district and safeguards a site for the development of a new secondary school. This builds on the strategic commitments of the wider JCS. Whilst there is some loss of employment land likely to occur, this is outweighed by the benefits of regeneration opportunities. Therefore, cumulatively the plan policies are predicted to have **minor positive effects** with regards to wealth creation and employment. The provision of new education facilities in identified locations is predicted to have **significant positive effects** in terms of education.

9.8 Town Centres

SA Objective: Protect and enhance the vitality and viability of town centres and market towns

Spatial Development Strategy

- 9.8.1 Policy EN1 sets out the spatial strategy for development in the district including a focus of development in towns and restricting development in the open countryside and restrained villages. The spatial concentration of development in and around towns is likely to strengthen the vitality and viability of town and local centres by sustaining and in some cases increasing populations and access to these important social and economic centres. In this regard, a minor positive effect is predicted.
- 9.8.2 Policies EN2 - EN6 set out settlement boundaries and seek to restrict development that does not resonate with built-up areas. Restricting the developable area should increase the viability of land within urban areas including the viability of sites in town centres. Increased densities in settlements should also support the economies of scale to increase the vitality and viability of uses in town centres and market towns. Cumulatively, a minor positive effect is predicted. The effects are predicted to be minor as national planning policy and guidance affords some restrictions to development beyond built-up areas.
- 9.8.3 Overall, the support for sustainable growth in the main town centres is considered likely to lead to minor long-term positive effects.

Natural Capital

- 9.8.4 The natural capital policies focus on the protection and enhancement of green infrastructure and open spaces, seeking overall improvements in connectivity.
- 9.8.5 Policies EN7 and EN8 set out a number of green infrastructure corridors to be supported through planning contributions which cross through town centres and market towns and provide strategic ecological and active travel connections. This is likely to enhance accessibility to town centres and market towns and the provision of new green infrastructure and open spaces are likely to result in positive improvements to the built environment which could enhance the viability of town centres and market towns. A minor positive effect is therefore predicted.

Social Capital

- 9.8.6 Whilst Policies EN16 and EN17 are unlikely to lead to any effects in relation to town centres, Policies EN12 - EN15 set out a number of measures to protect and where possible enhance the design of new development and to avoid harm to designated and non-designated heritage assets including listed buildings and conservation areas.
- 9.8.7 Encouraging high quality design for new development should enhance the townscape of town centres and subsequently improve their attractiveness to people and investment.

- 9.8.8 Many town centres and market towns include Conservation Areas and some concentration of heritage assets which are intrinsic to their character. Protecting and where possible enhancing historic features is likely to contribute positively to the distinctiveness and vitality of town centres which could increase visitors through tourism and culture and make them an attractive place to work and live. Therefore, the policies are likely to have minor positive effects overall.

Economic Prosperity

- 9.8.9 Policies EN18 – EN20 seek to protect existing employment areas and provide for business growth, either through small scale commercial spaces or relocation and expansion of existing business areas. Directing appropriate uses within and outside of the town centre, including through the use of sequential and impact tests (Policy EN20) will ultimately support vitality by protecting their role and function.
- 9.8.10 Policy EN21 aims to improve the provision of services, employment and housing, the built environment and accessibility of town centres. This is likely to enhance the vitality and viability of town centres and thus positive effects are predicted.
- 9.8.11 Policy EN22 sets out thresholds for retail development that would require an impact assessment. Whilst positive in principle as the policy seeks to safeguard the retail offer in town centres which is intrinsic to their purpose and vitality, effects are predicted to be neutral as such requirements are pre-established in national planning policy and a significant change from the existing baseline is unlikely.
- 9.8.12 Policy EN23 supports the expansion of local centres by setting out a presumption in favour of certain main town centre uses in areas in proximity to local centre boundaries. Improvements to the offering of local centres should enhance their vitality and viability and subsequently that of market towns. Requiring proposals to improve pedestrian and cyclist connectivity between the local centre and adjacent neighbourhood should enhance accessibility which is intrinsic to the vitality and viability of local centres and market towns.
- 9.8.13 Overall, the direct policy support provided to protect and enhance the role and function of town centres is considered likely to minor long-term positive effects.

Housing Delivery

- 9.8.14 Policies EN24 - EN32 are likely to have neutral effects on town centres as the policies do not directly relate to the objective.

Delivering Sustainable Urban Extensions

- 9.8.15 Policy EN33 sets out a sustainable urban extension including retail use, employment development and community facilities. It is anticipated that the SUE will provide a new local centre to support the significant growth area. The SUE is likely to lead to increased footfall in nearby town centres, as residents travel beyond the site to access a wider range of goods and services. Minor positive effects can therefore be anticipated; however, it is recognised that Policy EN33 follows on from the provisions of the JCS.

Town Strategies

- 9.8.16 Similar to Policy EN21, Policy EN34 aims to improve the provision of services, quality of the built environment and accessibility of town centres. This is likely to enhance the vitality and viability of town centres and thus positive effects are predicted.
- 9.8.17 These policies allocate regeneration sites within or in immediate proximity of town centres. The policies support the redevelopment of these sites for uses considered to support the vitality of town centres and could stimulate regeneration and economic development in the centres.
- 9.8.18 Policy EN35 further requires the redevelopment of the site allocation to deliver a new public space and policies EN35 and EN37 seek substantial improvements to public realm.

- 9.8.19 This is likely to enhance the townscape and provide important new social spaces which is likely to improve the vitality of Rushden town centre.
- 9.8.20 Policy EN41 requires redevelopment proposals for the former hotel in Oundle to include a scheme which results in improved pedestrian and cycle connectivity to the town centre. Whilst in principle this is positive, the town centre is spatially distant to the site allocation and the scope and viability for the redevelopment of the site allocation to achieve such improvements are unclear. The policy could be enhanced with further clarity in this respect.
- 9.8.21 Requirements in Policy EN42 for development proposals to deliver improved access to the High Street with active frontages, and for upper floors of development to utilise residential use, should support the extension of the established cluster of retail, leisure and financial services in Thrapston; by providing important modern floorspace and a concentration of households in the town centre. This should enhance the vitality and the viability of uses in Thrapston.
- 9.8.22 Overall, the direct policy support provided to protect and enhance the role and function of town centres is considered likely to lead to significant long-term positive effects.

Cumulative / overall effects

- 9.8.23 The Local Plan supports the strategic directions of the JCS to deliver growth in the main towns and urban areas. The combined policy frameworks seek to both enhance and protect the vitality and viability of town centres, including through new uses, regeneration and an element of housing provision (delivered through the Local Plan). As a result, **significant positive effects** are predicted

9.9 Biodiversity

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

Spatial Development Strategy

- 9.9.1 The spatial development strategy defined by Policy EN1 seeks to deliver the numbers set and planned for in the JCS, much of which has already gained planning permission. Significant strategic commitments such as Rushden East, Irthlingborough West and future development phases around Rushden Lakes will also be supported by masterplans.
- 9.9.2 An accompanying Habitat Regulations Assessment (HRA) has assessed the growth strategy in relation to European designated biodiversity sites and concludes that following some policy wording amendments, the Plan presents a sufficient policy framework to ensure no adverse effect on the integrity of any European site arises. It also considers that European site issues will not render any of the allocated sites underdeliverable.
- 9.9.3 Policy EN1 identifies the settlement hierarchy and where growth is anticipated. It further restricts development in the open countryside and in restraint villages and rural outliers. This is supported by Policies EN2 – EN6 which seek to define the boundaries of built-up areas in the District (and concentrate development within these areas), whilst protecting the open countryside and restricting development in open areas.
- 9.9.4 The spatial development strategy is considered likely to support habitats in the long-term, particularly rural habitats, though the concentration of development in settlement areas (which are less likely to contain expansive habitats). Despite this, habitats within urban areas should be protected where possible, and other policies discussed below contribute to protecting urban habitats in this respect (e.g. Policies EN7 – EN10).
- 9.9.5 Specific measures such as those; to give preference to sites “unlikely to be of any beneficial use as open land, including for agriculture” (Policy EN2), to exclude public open spaces (Policy EN3), and to pay regard to “positive local character and distinctiveness” (Policy EN4) are also likely to positively support the retention and protection of key urban habitats.
- 9.9.6 Considering these points, minor long-term positive effects are anticipated as a result of the spatial development strategy policies.

Natural Capital

- 9.9.7 The policies seek to provide enhanced natural capital policy provisions and lead on from the policies of the adopted JCS. Whilst the JCS identifies strategic Green Infrastructure (GI) routes, the Plan takes the opportunity to identify local site-specific proposals and additional linear connections, supported by a local spatial analysis of GI resources. This work culminates in Policy EN7 which identifies ‘Priority Green Infrastructure Corridors’ to connect with new development areas and open spaces and ensure the delivery of ecosystem services. This includes measures “such as green roofs and walls, the protection of soils, plus new tree planting” to the benefit of biodiversity.
- 9.9.8 Particular attention is paid to ‘The Greenway’ as a central GI route that provides multiple benefits for biodiversity, health, communities and accessibility. Whilst measures are already in place to drive the implementation of the full route through East Northamptonshire to Peterborough, including the Greenway Forward Plan and the Oundle Cycle Network Study, the Plan recognises the opportunity to support successful delivery, particularly by outlining the implications for future development in relation to this route. In this respect Policy EN8 identifies The Greenway as a priority project “requiring both investment and improvement”. The policy requires development to be designed to protect and enhance the route with the aim “to provide fully integrated connections along the Nene Valley” achieved through development and developer contributions, ultimately supporting improved ecological connections across the District.

- 9.9.9 Furthermore, the promoted designation and enhancement of Local Green Spaces (through Policies EN9 and EN10) is also likely to benefit biodiversity in the long-term. Neighbourhood Plans are encouraged through Policy EN9 to provide the policy protections afforded by the designation of Local Green Spaces for locally valued areas of biodiversity.
- 9.9.10 Policy EN11 seeks to ensure that development provides new or contributes to the enhancement of existing playing pitches, sports and recreational facilities to support a growing population. The policy gives preference to new facilities being provided on-site which will ensure that the effects of development on biodiversity are fully considered in any given proposal.
- 9.9.11 Considering the above, the natural capital policies are considered likely to lead to minor long-term positive effects overall.

Social Capital

- 9.9.12 The social capital policies predominantly relate the design and layout of development, so it is conducive with healthy lifestyles and protects valued cultural heritage assets with likely negligible effects for biodiversity.
- 9.9.13 New tourism development is expected under Policy EN6 to “not adversely affect sensitive land use designations (e.g. SSSI and SPA)” and should be accompanied by an Appropriate Assessment where required. It further requires that development “does not have a significant impact upon other types of designated and non-designated biodiversity sites.”
- 9.9.14 Policy EN17 allocates land for the development of a new school in Higham Ferrers where “net gains to recreational open space provision and green infrastructure” which are likely to support biodiversity gains overall in development. As a result, minor long-term positive effects are considered likely.

Economic Prosperity

- 9.9.15 The economic prosperity policies seek to protect existing employment areas and provide sufficient flexibility for businesses to grow in the District. The employment growth over the Plan period has largely been committed through the strategic development occurring across the District, including at Islip, Raunds and Rushden Lakes, in line with the economic growth target set by the JCS. Masterplanning of key sites is expected to support natural capital gains in line with JCS requirements which is likely to benefit biodiversity in the long-term. Policy EN20 provides further support for biodiversity, by ensuring that any relocation or expansion of business “would not result in a significant impact on ecology”. As a result, the economic prosperity policies are considered likely to lead to neutral effects overall.

Housing Delivery

- 9.9.16 The proposed housing allocations seek to address the outstanding residual housing requirements for Rushen, Irthlingborough and Oundle. The Upper Nene Valley Gravel Pits SPA is a key sensitive receptor in terms of growth at Rushen and Irthlingborough. As discussed under the ‘Spatial Development Strategy’ above, the HRA has assessed the proposed allocations for their potential to affect European designated biodiversity and considers that European site issues will not render any of the allocated sites underdeliverable.
- 9.9.17 Site-specific measures such as those to demonstrate biodiversity impacts have been fully considered in proposals at Oundle (Policy EN24) and deliver net biodiversity gains including off-site measures to enhance local wildlife sites and GI routes (Policies EN26 and EN28) are likely to support minor positive effects in the long-term.
- 9.9.18 Policies EN29 – EN32 are concerned with the type and mix of housing rather than its location, layout or design. Therefore, neutral effects are predicted for these policies in relation to biodiversity.

Delivering Sustainable Urban Extensions

- 9.9.19 The SUE at Rushden East leads on from the strategic directions of the JCS and will be supported by a masterplanning framework and design guidance SPD. Policy EN33 outlines the strategic requirements in this respect and provides additional support by defining the development boundary. The Policy acknowledge the requirement for Suitable Alternative Natural Green Space, as a key measure to address the impacts of growth and its associated recreational pressures on European designated biodiversity sites. This additional policy provision is thus considered likely to lead to minor long-term positive effects in relation to biodiversity.

Town Strategies

- 9.9.20 The town centre policies allocate key brownfield regeneration sites to deliver new housing, employment and town centre uses. As brownfield sites, none are known to hold significant biodiversity values, however the proximity to designated and locally valued sites is recognised. Policy EN40 allocates the former stadium site adjacent to the SPA, and the policy requires proposals to deliver “measures to enhance biodiversity, deliver ecosystem services and ensure that any development does not have any significant adverse impact upon the adjacent SPA/ Ramsar site.” Alongside the wider policy framework, neutral effects are considered likely as a minimum.

Cumulative / overall effects

- 9.9.21 Alongside the provisions of the adopted Joint Core Strategy, which includes a requirement for natural capital gains through the Green Infrastructure Network, the additional protections and enhancement measures provided through the Plan are considered likely to lead to **minor long-term positive cumulative effects**. This is particularly relevant to the differing geographies and scale, with strategic measures identified through the Joint Core Strategy and more localised measures promoted through the Plan seeking to complement these. Local level development and developer contributions are anticipated to support the implementation of strategic GI routes. Enhanced accessibility to, and ecological connections with these routes are considered likely to benefit biodiversity at the strategic scale and contribute to multiple benefits, including for biodiversity, health, communities and accessibility.
- 9.9.22 Furthermore, the continued support for provision of a new SANG at Rushden East will contribute to reducing cumulative pressures on European designated biodiversity sites.
- 9.9.23 Development of sites that are allocated at Oundle and Rushden are unlikely to lead to significant effects with regards to biodiversity loss and disturbance. Though there are important features such as hedgerows and trees nearby or on site, these should be possible to retain, and net gain will also be a requirement.

9.10 Landscape

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

Spatial Development Strategy

- 9.10.1 The spatial development strategy defined by Policy EN1 focuses growth in the main urban areas in the District. Furthermore, it seeks to restrict development in the open countryside and open areas where landscape sensitivity is likely to be high. Recognising this follows on from the provisions of the JCS, the growth strategy is supported by Policies EN2 – EN4 which further seek to define the boundaries of built-up areas in the District and concentrate development within these areas, whilst recognising the role that neighbourhood planning also plays in this respect. Significant strategic commitments such as Rushden East, Irthlingborough West and future development phases around Rushden Lakes will also be supported by masterplans.
- 9.10.2 Policies EN5 – EN6 further restrict development in open areas and areas beyond the defined settlement boundaries to appropriate development schemes for such locations (e.g. rural exception housing and replacement dwellings).
- 9.10.3 Overall, the spatial strategy supports the protection and retention of key landscape areas and features in the District, and minor long-term positive effects can be anticipated.

Natural Capital

- 9.10.4 The natural capital policies all seek to protect and enhance green infrastructure and open spaces in the District, which will ultimately positively affect landscape characteristics and features. Specific measures such as those to support the creation of new GI corridor connections (Policies EN7 and EN8), linked to new open and green spaces (Policies EN7, EN9 and EN10) are likely to deliver new landscape features and enhance local access to valued landscapes, and as a result, minor long-term positive effects are considered likely overall.

Social Capital

- 9.10.5 The natural and built environment impacts upon health and wellbeing, as recognised through Policy EN12 which requires effective application of place shaping principles to support positive health outcomes. This includes the creation of “a distinctive, high quality and accessible public realm”. Supported by Policy EN13 which requires development proposals to “relate well to, and where possible enhance, the surrounding environment”. With measures specific to townscape design principles which recognise local distinctiveness, character and visual appeal. The policies thus support long-term positive effects for built environments in the Plan area.
- 9.10.6 Policies EN14 and EN15 seek to protect and enhance the historic environment, including both designated and non-designated assets which contribute to historic landscape characteristics. Minor long-term positive effects are therefore anticipated.
- 9.10.7 Tourist attractions in the District include key landscape areas such as the Nene Valley corridor and Rockingham Forest. Whilst Policy EN16 supports tourism development the policy proposed specific measures to reduce landscape impacts, including the requirement to “not have an adverse impact on the surrounding countryside designations such as the King’s Cliffe Hills and Valleys Area of Tranquillity”, and deliver enhanced GI connections. No significant impacts are therefore considered likely.
- 9.10.8 Policy EN17 allocates land in Higham Ferrers for the development of a new school. Impacts in development are likely to relate to the immediate townscape and historic townscape features. However, alongside the wider policy provisions, the requirement for “net gains to recreational open space provision and green infrastructure” is likely to minimise the impacts arising.

- 9.10.9 Overall, the social capital policies are considered likely to lead to minor long-term positive effects through the requirement for high-quality design and place shaping principles including enhanced GI connections.

Economic Prosperity

- 9.10.10 The economic prosperity policies seek to protect existing employment areas and provide sufficient flexibility for businesses to grow in the District. The employment growth over the Plan period has largely been committed through the strategic development occurring across the District, including at Islip, Raunds and Rushden Lakes, in line with the economic growth target set by the JCS. Masterplanning of key sites is expected to support a landscape-led approach which seeks to minimise landscape impacts.
- 9.10.11 The Plan policies provide further support for small scale development with structural landscaping where necessary (Policy EN18) and seek to only support development which would not result in a significant impact on the character of the surroundings (Policy EN20). Furthermore, measures to improve townscape features and enhance the streetscape (Policy EN21) are likely to lead to minor long-term positive effects overall.

Housing Delivery

- 9.10.12 The proposed housing allocations seek to address the outstanding residual housing requirements for Rushen, Irthlingborough and Oundle. The Oundle housing allocations (Policies EN24 – EN27) are edge of settlement locations with medium to high visual sensitivity. Policy EN24 identifies that key considerations at the sites include “impact on the surrounding landscape and street scene, to be addressed through site design, mix and layout.” Specific on-site requirements in Policies EN25 – EN27 includes new public right of way connections, structural landscaping, and biodiversity net gains that support high quality built environments.
- 9.10.13 The Rushden site is relatively well contained and as such visual impacts are likely to be low. However, the site extends development beyond the A6 boundary of the urban area. Greenfield development could be considered for minor long-term negative effects with regards to landscape. However Policy EN28 requires a design-led masterplan for the site which addresses the connectivity issues of the site as well as multi functional structural landscaping and new landmark features. Alongside the wider policy framework, the impacts are likely to be minimised.
- 9.10.14 Policies EN29 – EN32 are concerned with the type and mix of housing rather than its location, layout or design. Therefore, neutral effects are predicted for these policies in relation to landscape.
- 9.10.15 Overall, the housing delivery policies and allocations are not considered likely to lead to any significant impacts, however, incremental loss of greenfield land at the urban edge is considered likely to lead to minor long-term negative effects with regards to landscape on the whole.

Delivering Sustainable Urban Extensions

- 9.10.16 The SUE at Rushden East leads on from the strategic directions of the JCS and will be supported by a masterplanning framework and design guidance SPD. Policy EN33 outlines the strategic requirements in this respect and provides additional support by defining the development boundary. The Policy acknowledges the requirement to demonstrate good integration taking into account both the natural and built environment. The additional design guidance SPD is likely to support design that minimises landscape impacts and maximises opportunities for landscape and townscape enhancement, particularly within the area identified to deliver a ‘bespoke residential character’. Though large scale greenfield development is likely to lead to negative effects on landscape character, this decision has already been made in the JCS and is not attributable to the Part 2 Plan.

Town Strategies

- 9.10.17 The town centre policies identify key brownfield regeneration sites to deliver new housing, employment and town centre uses. As regeneration sites, some of which are currently vacant, minor long-term positive effects can be anticipated through high quality new schemes that improve upon areas currently likely to detract from the townscape.

Cumulative / overall effects

- 9.10.18 Cumulatively the growth strategy across the wider HMA is likely to impact upon landscape to some degree, particularly through development of greenfield land, and growth at the main towns and urban areas. Despite this, the strategic coordination of the delivery of housing and employment development through the JCS and Local Plan does seek to minimise impacts on rural landscapes.
- 9.10.19 Though additional site allocations could lead to some minor negative effects on landscape, the broader policies in the Plan are protective and where regeneration is involved could be positive.
- 9.10.20 In this respect, both **minor positive** and **minor negative** cumulative effects are predicted.

9.11 Cultural Heritage

SA Objective: Protect and enhance sites, features and areas of historical, archaeological, architectural and artistic interest and their settings.

Spatial Development Strategy

- 9.11.1 The spatial development strategy defined by Policy EN1 leads on from the adopted JCS and much of the planned growth has already gained planning permission. The growth strategy and settlement boundary policies (Policies EN1 – EN4) ultimately seek to contain development within identified urban areas and it is recognised that many of these areas hold key heritage values. The spatial strategy thus has the potential to detract from heritage values and lead to negative effects, however other policies, such as the Social Capital Policies and existing policies of the JCS seek to mitigate these potential effects (as explored further below).
- 9.11.2 Alternatively, the protection and retention of open countryside and open areas (Policies EN5 – EN6) will support the protection of historic rural landscapes, historic field patterns and farmsteads, and the settings surrounding key historic settlements. Minor long-term positive effects are anticipated in this respect.

Natural Capital

- 9.11.3 The natural capital policies focus on protection and enhancement of GI, open spaces and playing pitches, the development of which do not significantly impact upon designated and non-designated heritage assets; but may positively reinforce heritage settings. Indirect minor positive effects could therefore be considered overall.

Social Capital

- 9.11.4 Policies EN14 and EN15 seek to enhance local policy protection for both designated and non-designated heritage assets supporting long-term positive effects. The policies recognise the need to give 'great weight' to a designated asset's conservation, including through viable uses, and the need to pay regards to the significance on non-designated assets and heritage settings.
- 9.11.5 Both Policies EN12 and EN13 seek high quality design and place shaping principles which support an improved public realm and increased accessibility (particularly in terms of the pedestrian network) which could provide indirect benefits for heritage settings.
- 9.11.6 Given the policy provisions above, any new tourism development (Policy EN16) and the new school allocation at Higham Ferrers are not considered likely to significantly impact upon the historic environment.
- 9.11.7 Overall, the additional social capital policy protections for both designated and non-designated heritage assets are considered to support direct minor long-term positive effects in relation to this SA objective.

Economic Prosperity

- 9.11.8 The economic prosperity policies seek to protect existing employment areas and provide sufficient flexibility for businesses to grow in the District. The employment growth over the Plan period has largely been committed through the strategic development occurring across the District, including at Islip, Raunds and Rushden Lakes, in line with the economic growth target set by the JCS. No additional sites are identified through the policies that would specifically impact upon key assets or heritage settings, and as such neutral effects are considered likely on the whole. However, minor indirect positive effects could be drawn in relation to Policy EN21 which seeks to improve the public realm and streetscape in town centres, to the benefit of some of the District's most valued heritage settings.

Housing Delivery

- 9.11.9 The proposed housing allocations seek to address the outstanding residual housing requirements for Rushen, Irthlingborough and Oundle. The Oundle housing allocations (Policies EN24 – EN27) are edge of settlement locations are not considered likely to significantly affect any designated heritage settings, though it is recognised the wider setting of the Conservation Area may need to be considered in development at Stoke Doyle Road (Policy EN25). Social capital policies provide mitigation in this respect. The Rushden site (Policy EN28) is also noted for no constraints in relation to both designated and non-designated assets and heritage settings. Policies EN29 – EN32 focus on the type and tenure of homes and are not likely to affect this SA objective. As a result, neutral effects are considered likely overall.

Delivering Sustainable Urban Extensions

- 9.11.10 The SUE at Rushden East leads on from the strategic directions of the JCS and will be supported by a masterplanning framework and design guidance SPD. Policy EN33 outlines the strategic requirements in this respect and provides additional support by defining the development boundary. Heritage impacts predominantly relate to the relationship of the site with Rushden which has a distinctive history and identity. The site and appropriate mitigation measures in development have been deemed acceptable in principle from a heritage perspective given the allocation of the SUE through the JCS, no significant effects are therefore considered likely. The implementation of the additional policy is considered likely to lead to neutral effects overall.

Town Strategies

- 9.11.11 The town centre policies allocate key brownfield regeneration sites to deliver new housing, employment and town centre uses. As regeneration sites, some of which are currently vacant, indirect minor long-term positive effects can be anticipated through high quality new schemes that improve upon areas currently likely to detract from the townscape and heritage settings. In fact, there are specific policy clauses for the regeneration areas that mention the need to retain and protect heritage assets, whilst enhancing their settings.

Cumulative / overall effects

- 9.11.12 Cumulatively the growth strategy across the wider HMA is likely to impact upon historic townscapes and landscapes to some degree, the extent of which is uncertain. Despite this, the strategic coordination of the delivery of housing and employment development through the JCS and Local Plan alongside the combined policy protection and enhancement measures are likely to ensure that cumulative impacts are not significant. Though some development locations are close to or contain heritage assets, there are policy mitigation measures in place that ought to ensure negative effects are minimised and enhancements to the built environment are secured. As a whole, the ENLP is predicted to have **minor positive effects** in the long term.

9.12 Climate change and Energy Use

SA Objective: Reduce the emissions of greenhouse gases and impact of climate change (adaptation).

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

Spatial Development Strategy

- 9.12.1 The spatial development strategy defined by Policy EN1 leads on from the JCS supporting the defined settlement hierarchy and direction of growth in the District. Supported by Policies EN2 – EN6 which seek to define the built-up areas in the District and concentrate development within these areas, whilst protecting the open countryside and restricting development in open areas. The strategy thus supports development in the most accessible areas of the District, and minor long-term positive effects are predicted as a result of development which reduces the need to travel (and thus carbon emissions).

Natural Capital

- 9.12.2 The natural capital policies seek to protect and enhance access to GI, open space and playing pitches. The expansion of GI, particularly strategic improvements such as The Greenway (Policy EN8) are considered likely to support adaptation through enhanced biodiversity, ecological links and carbon sequestration. Furthermore, the delivery of alternative routes that can support active travel are also likely to lead to benefits in terms of mitigation, supporting a modal shift and more sustainable journeys. As a result, minor long-term positive effects are anticipated overall.

Social Capital

- 9.12.3 Policies EN12 and EN13 seeks to influence high quality design and place shaping principles which support healthy outcomes. Emphasis is placed on accessibility and connectivity as well as amenity and space standards which is likely to lead to minor positive effects in relation to climate change mitigation. Whilst the policy provisions of the JCS seek to influence development in terms of energy efficiency and high quality design, it is recognised that the Local Plan provides further opportunity to advance climate change policy measures, particularly through the design of development and implementation of smart infrastructure (e.g. EV charging points), which further recognises the Council's more recent commitment to carbon neutrality by 2030 as a result of the County Council's Climate Emergency Declaration in 2019.

Economic Prosperity

- 9.12.4 The economic prosperity policies seek to protect existing employment areas and provide sufficient flexibility for businesses to grow in the District, as well as enhance the role of town centres. The employment growth over the Plan period has largely been committed through the strategic development occurring across the District, including at Islip, Raunds and Rushden Lakes, in line with the economic growth target set by the JCS. No additional sites are identified through the policies that would specifically impact upon climate change or flood risk. However, the support for improved town centres can indirectly benefit climate change mitigation through supporting high levels of accessibility and a modal shift. As a result, minor indirect long-term positive effects are anticipated.

Housing Delivery

- 9.12.5 The housing delivery policies seek to meet the residual housing needs in Oundle, Rushden and Irthlingborough. The small-scale development sites are unlikely to provide significant opportunities to incorporate district level heating and energy generation schemes. However, it ought to be possible to secure high standards of environmental performance. This is not an explicit requirement set out in the ENLP though, and so neutral effects are predicted.

- 9.12.6 The level of housing growth involved is in-line with the JCS target, and therefore effects are likely to be neutral in terms of absolute carbon emissions from the built environment.

Delivering Sustainable Urban Extensions

- 9.12.7 As a strategic development site the Rushden East SUE has good potential to support the delivery of positive effects in relation to climate change. In particular, the scale of development could make district heating or combined heat and fuel systems more viable in development to support new communities with high levels of energy efficiency. Buildings can be designed and laid out in such a way to maximise solar gains and increase efficiency using a 'fabric first' approach. High levels of accessibility, alongside measures to improve drainage and deliver new GI including new parkland are further measures in development at the SUE which are likely to support climate change and energy efficiency in the long-term.
- 9.12.8 However, these principles for resilient development are not eluded to within Policy EN33. Whilst the provisions of JCS Policy 33 seek to ensure that development at the site incorporates an "energy strategy to ensure that the highest viable amount of heat and energy used within the development is generated on-site from renewable or low-carbon sources", the Local Plan can provide further directions to enhance the potential for positive effects. Currently Policy EN33 is considered likely to lead to neutral effects overall.

Town Strategies

- 9.12.9 The town centre policies allocate key brownfield regeneration sites to deliver new housing, employment and town centre uses. As regeneration sites, some of which are currently vacant, indirect minor long-term positive effects can be anticipated through high quality new schemes that improve upon drainage on-site and secured improved building efficiency in terms of energy and water usage.

Cumulative / overall effects

- 9.12.10 The level and distribution of growth has largely been planned for strategically through the JCS, which includes significant strategic growth schemes and SUEs. These schemes across the wider area present opportunities to significantly increase the efficiency of new homes, employment, retail and community development. The continued support provided at the local level is likely to support wider actions to move to carbon neutrality and deliver **cumulative minor positive effects** in this respect.

9.13 Air

SA Objective: To maintain or improve local air quality.

Spatial Development Strategy

- 9.13.1 The spatial development strategy defined by Policy EN1 and supported by Policies EN2 – EN6 lead on from the JCS supporting the defined settlement hierarchy and direction of growth in the District. Policies EN2 – EN6 seek to define the built-up areas in the District and concentrate development within these areas, whilst protecting the open countryside and restricting development in open areas. Whilst this supports development in the most accessible areas of the District, it is recognised that often the most built-up areas are those that suffer from areas of poor air quality, particularly as a result of traffic hotspots. Thus, whilst it is important to ensure development maximises accessibility (and the strategy performs well in this respect), it will be equally important to ensure that urban development manages air quality impacts. Overall, when considering the growth strategy alongside the policy mitigation of the JCS and the Local Plan (discussed below), minor long-term positive effects are considered likely overall.

Natural Capital

- 9.13.2 The natural capital policies seek to protect and enhance access to GI, open space and playing pitches. The expansion of GI, particularly strategic improvements such as The Greenway (Policy EN8) are considered likely to support improved air quality by providing long distance, attractive and connected active travel routes (supporting a modal shift) and through natural effects such as increased carbon sequestration. The enhanced access to local open space and sport and recreational facilities can also support a reduced need to travel to benefit of local air quality. As a result, minor long-term positive effects are anticipated overall.

Social Capital

- 9.13.3 Policies EN12 and EN13 seeks to ensure that development supports healthy lifestyles, including by creating an accessible public realm that encourages physical activity. The support for modal shift is considered likely to provide minor benefits for local air quality.
- 9.13.4 Policies EN14 – 15 are predicted to lead to neutral effects, with a focus on design aspects and the protection and enhancement of historic and cultural assets.
- 9.13.5 Policy EN16 supports tourist development, particularly along the Nene Valley and Rockingham Forest areas. These areas are accessible by car, and to an extent by public transport. The effects on accessibility and local air quality are therefore unlikely to be significantly different to the baseline situation. With regards to the reuse of disused buildings for conversion to B&B accommodation, this is likely to encourage car usage, but the magnitude of effects would be very small. Overall, neutral effects are considered likely. It may be beneficial to include a clause that seeks to ensure that new attractions are accessible by public transport, to ensure that they do not rely upon private car usage too heavily.
- 9.13.6 Policy EN17 allocates land for development of a new school at Higham Ferrers, which will boost local accessibility and walkable journeys to key educational facilities, again providing support for modal shift. Despite this, schools can create congestion hotspots at drop off and collection times that may be detrimental to local air quality. It is expected that such impacts would be addressed at the site proposal stage.
- 9.13.7 Overall, the social capital policies are considered likely to support minor long-term positive effects, as a result of the policy focus on increased accessibility, particularly in terms of active travel opportunities, and support for modal shift which reduces impacts on air quality.

Economic Prosperity

- 9.13.8 Policy EN18 supports the development of accessible new commercial space which delivers “pedestrian, cycle and public transport connections to adjacent businesses, residential areas and public open spaces” supporting alternatives to more polluting means of transport.
- 9.13.9 The protection and enhancement of existing business under Policies EN19 and EN20 are likely to lead to neutral effects, particularly given existing areas are likely to be broadly accessible locations.
- 9.13.10 Policy EN21 is likely to lead to a minor positive effect in relation to reducing the need to travel as it seeks to support a range of facilities in the town centre that are easily accessible to people. Improving connectivity is also positive to encourage walking from surrounding residential areas. However, effects are not significant, as car use would still be expected to dominate.
- 9.13.11 Applying the impact test is positive in terms of access, as it discourages out of town facilities that are less accessible and promote car usage. The application of the test is standard practice, and so Policy EN22 has minimal effects in this respect. However, by setting relatively low thresholds, this means that more potential out of town developments would be captured and perhaps avoided, which is a minor positive effect.
- 9.13.12 Policy EN23 is likely to have a minor positive effect in reducing the need to travel, as it supports a range of services and facilities around existing local centres. It also seeks to improve connectivity between surrounding residential areas. The effects would be relatively minor, as the number of people changing their retail habits would not be anticipated to be substantial.
- 9.13.13 Overall, the economic prosperity policies are considered likely to lead to minor long-term positive effects, by supporting accessible economic growth and discouraging out of town facilities which would be likely to increase car usage to the detriment of air quality.

Housing Delivery

- 9.13.14 Whilst the housing allocations in Policies EN24 – EN28 are supported by relatively good access to educational facilities and recreational space, and potentially some local services, development is still considered likely to lead to increase vehicle use in certain areas. This has the potential to affect local air quality, but in the absence of significant problem areas (such as declared AQMAs) no significant effects are considered likely. Site specific policy mitigation is also provided through Policy EN24 which identifies impacts on air quality as a key consideration for development in Oundle. The impacts of air quality along the A6 on resident amenity will also need to be considered at the Rushden site, as recognised in Policy EN28 which expects appropriate boundary treatment to provide the necessary mitigation for noise and air pollution arising from the A6 Bypass.
- 9.13.15 Whilst the impacts of growth are likely to be managed to avoid any significant effects, minor negative effects are considered likely in the medium term, whilst we transition to more sustainable private transport means.

Delivering Sustainable Urban Extensions

- 9.13.16 Similar to the housing delivery allocations, the allocation of the SUE will be supported by good levels of accessibility, particularly through the mix of uses proposed on-site and enhanced connections with the existing settlement area. Despite this it is recognised that development is likely to increase car usage overall. In the absence of significant problem areas (such as declared AQMAs) no significant effects are considered likely. Minor negative effects are again predicted in the medium term, whilst we transition to more sustainable private transport modes. However, development at the SUE is already established through the JCS. Further effects associated with the ENLP are neutral.

Town Strategies

- 9.13.17 Policy EN34 supports enhanced pedestrian links within town centres and to surrounding areas, which can provide support for modal shift. Its principles should also help to reverse the decline of town centres and make them more attractive for visitors. Given that the town centres are generally more accessible by public transport, and do not necessarily rely on private cars (such as out of town retail parks), this is unlikely to lead to significant negative effects for local air quality.
- 9.13.18 The allocated regeneration sites (Policies EN35 – EN42) seek to develop appropriate town centre uses which includes an element of housing. The mix of uses in the most accessible areas of the District can support both a modal shift and a reduced need to travel, to the benefit of local air quality.
- 9.13.19 Overall, the additional development of housing, employment and town centre uses proposed through the town strategies policies are considered likely to lead to minor long-term positive effects. Predominantly as a result of development in accessible locations reducing the need to travel and policy provisions which seek to enhance pedestrian and active travel links.

Cumulative / overall effects

- 9.13.20 The strategic coordination of growth across the wider HMA seeks to enhance the accessibility of development and ensure strategic connectivity. This will provide support for modal shift and reduced air quality impacts and minor cumulative positive effects.
- 9.13.21 The ENLP continues in this vein by supporting growth in accessible locations and encouraging an increase in sustainable modes of travel and green infrastructure. These aims are reflected in the spatial strategy, which locates unmet needs in higher order settlements (Rushden) as a matter of priority (whilst also seeking to meet unmet needs where they arise in Oundle). Overall, the effects in terms of air quality are predicted to be **minor positive** in the long term.

9.14 Water

SA Objective: Maintain or improve the quality of ground and surface water resources and minimise the demand for water.

Spatial Development Strategy

- 9.14.1 Policies EN1 - EN5 set out a spatial strategy and settlement boundaries aimed to concentrate development in existing built-up areas. This should help reduce the loss of potential greenfield land around settlements and thus should help sustain existing quality and flow of water discharge.
- 9.14.2 Policy EN3 further seeks to safeguard existing public open space around freestanding villages. These effects are likely to be neutral as development or the absence of development as a result of these policies is unlikely to be of a scale to substantially affect the quality or flow of water discharge. Overall, neutral effects are predicted.
- 9.14.3 Policy EN6 is likely to have neutral effects on water due to the policy not having direct effects on the objective.

Natural Capital

- 9.14.4 Policies EN7 and EN8 identify and support the creation of green infrastructure corridors / greenways. Policy EN7 further encourages the use of green roofs and walls and tree planting. The implementation of new green infrastructure is likely to reduce the rate of run-off and improve water quality by slowing and supporting the penetration of rain into the soil which act as natural filters. A minor positive effect is predicted for these policies.
- 9.14.5 Policy EN9 supports the designation of local green spaces in neighbourhood plans by effectively extending the scope of green spaces which can be designated from that established in national planning policy. Safeguarding green spaces should support natural drainage. However, the policy does not deviate significantly from established national policy and thus neutral effects are predicted.
- 9.14.6 Policy EN10 sets out requirements for the provision of open space but does not set out any standards for these to influence sustainable drainage systems, green infrastructure or other measures which may influence water. Therefore, any effects above the established baseline is not likely to be significant and neutral effects are predicted.
- 9.14.7 Policy EN11 is likely to have neutral effects as it supports the delivery of sports and recreational facilities and does not directly set out requirements to influence water.

Social Capital

- 9.14.8 Policies EN12 - EN16 are likely to have neutral effects on water due to the policies not having direct effects on the objective.
- 9.14.9 Policy EN17 does not directly relate to the water objective and is likely to have neutral effects. The policy does set out a requirement for net gains in green infrastructure which has potential to enhance the quality of run-off, but these effects are likely to be negligible.

Economic Prosperity

- 9.14.10 Policy EN18 sets out a requirement for the incorporation of suitable structural landscaping which could have limited effects on enhancing local water quality. However, these effects are predicted to be negligible and overall neutral effects are likely.
- 9.14.11 Policies EN19 - EN23 are likely to have neutral effects on water due to the policies not having direct effects on the objective.

Housing Delivery

- 9.14.12 Policy EN24 sets out a number of key considerations for the housing allocations including the management of water resources, flood risk, drainage water supply and sewage. However, the policy does not set out standard to ensure positive effects are achieved but instead merely outlines that water related issues will be considered. Therefore, this policy is predicted to have a neutral effect on the objective, as it broadly aligns with the established baseline for water related issues to be addressed through the planning system.
- 9.14.13 Policies EN25, EN26 and EN28 allocate site options which fall on agricultural land. The change in use of these sites from agricultural use should reduce pollution in water discharge associated with farming activities. However, at a cumulative level the extent of improvement in water quality is likely to be negligible and somewhat offset by potential pollution as a result of the urbanisation of these sites. Therefore, neutral effects are predicted. The effects are likely to be more positive for Policy EN26 as there is potential for development to address any potential discharge of pollution into the nearby River Nene.
- 9.14.14 Policies EN25 and EN27 require development proposals to include landscaping aimed to mitigate potential adverse effects. However, effects on water quality are likely to be negligible and neutral effects are predicted overall. Similarly, neutral effects are predicted for Policies EN29 - EN31 as these policies do not directly relate to the objective.
- 9.14.15 Policies EN26 and EN28 set out requirements for the implementation of sustainable urban drainage, which is likely to minimise pollution in water discharge and improve the rate of discharge which could help reduce the risk of fluvial flooding, especially for the site allocation proposed under Policy EN26 which part falls within and is adjacent to a corridor of Flood Zone 2 and 3 along the River Nene.
- 9.14.16 Policy EN26 further requires improvements to the west to east drainage capacity which should further help address fluvial flood risk. Overall, these policies are likely to have minor positive effects, as they set out measures which are likely to enhance water quality and discharge at a localised scale. However, these effects are not predicted to be significant due to their likely localised impact and as they do not deviate substantially from pre-established policy context and practice.

Delivering Sustainable Urban Extensions

- 9.14.17 This policy is likely to have neutral effects as it broadly does not relate to the water objective. The policy does propose a park, allotments, cemetery and green space which should offset some effects on the natural drainage of water as a result of the urbanisation of the site. The proposed urban extension falls on agricultural land and its development is likely to enhance water quality at a localised scale through the reduction of farming related pollution in the water discharge which could be sustained through suitable drainage infrastructure such as SuDS, although these are not required by the policy.

Town Strategies

- 9.14.18 Policy EN34 seeks to enhance the quality of urban design and sets out a focus on low carbon energy solutions through measures including green initiatives such as tree planting. The measures could improve the quality of water discharge but the likely effects are unclear and likely to be low in magnitude. Therefore, neutral effects are predicted.
- 9.14.19 Policies EN35 - EN42 set out measures for the redevelopment of a number of brownfield sites. Whilst the policies do not directly advocate the use of sustainable drainage systems, the integration of green infrastructure or other measures to enhance water quality and efficiency, it is likely that redevelopment would provide some opportunities for enhancements on these sites which is likely to result in some positive effects on water at a localised scale. However, the scale and likelihood of these effects are unclear and an uncertain minor positive effect is predicted.

Cumulative / overall effects

- 9.14.20 The plan policies do not seek to directly address issues in relation to water quality but the plan is likely to have some indirect **minor positive effects** through the introduction of green infrastructure or sustainable drainage through the natural purification of water. The plan policies do not set out any measures to reduce water consumption, encourage water efficiency or to ensure the capacity of available water resources, and so **neutral effects** are predicted in this respect.

9.15 Natural Hazards

SA Objective: Reduce the impact of flooding and avoid additional risk.

Spatial Development Strategy

- 9.15.1 The spatial development strategy seeks to direct most growth towards the main urban areas (in line with the strategic directions of the JCS), and within the defined settlement boundaries. This could potentially increase pressure on land availability within the settlement confines and subsequently pressures to develop in areas of higher constraint. However, the strategic scale growth sites are largely committed with planning permission or have been deemed acceptable in planning terms through the development of the JCS. As a result, no significant effects in relation to flood risk are anticipated at this stage. The effects of additional housing, employment and town centre allocations are explored further within the relevant sections. At this stage, neutral effects are considered likely.

Natural Capital

- 9.15.2 Policies EN7 and EN8 designate and seek to enhance green infrastructure corridors and greenways, encourage the use of green roofs and walls and encourage tree planting. These measures should help improve the rate of runoff and reduce the risk of flooding. A minor positive effect is predicted for these policies.
- 9.15.3 Policy EN9 supports the designation of local green spaces in neighbourhood plans and Policy EN10 set out requirements for the provision of open space in development. Whilst safeguarding existing and the provision of new green and natural spaces in urbanised areas should help reduce the likelihood of flooding through improved run-off. This broadly aligns with the established planning policy context and opportunities to utilise green and open spaces to reduce potential impacts of flooding such as to be designed to form overspill areas during a flood event are missed. These policies are predicted to broadly have neutral effects on the objective. Policy EN11 is also likely to have neutral effects as it supports the delivery of sports and recreational facilities and does not directly set out requirements to influence natural hazards.
- 9.15.4 Overall, the natural capital policies are considered likely to lead to minor long-term positive effects, predominantly as a result of extended and enhanced green infrastructure supporting natural drainage systems.

Social Capital

- 9.15.5 The social capital policies are considered likely to have neutral effects in relation to natural hazards, with no specific measures proposed relating to flood risk.
- 9.15.6 Policy EN16 encourages tourism-related development in the Nene Valley corridor and Rockingham Forest and sets out a number of measures to protect sensitive areas from adverse effects. The policy is not likely to directly influence natural hazards and thus is predicted to have neutral effects on the objective.
- 9.15.7 Policy EN17 sets out a requirement for net gains in green infrastructure which has some potential to improve natural run-off and reduce potential effects of flooding, but these effects are likely to be negligible. Overall, the policy is predicted to have neutral effects.

Economic Prosperity

- 9.15.8 The economic prosperity policies are considered likely to have neutral effects, with no specific measures proposed relating to flood risk.
- 9.15.9 Policy EN18 sets out requirements for new employment space for small businesses to include suitable structural landscaping where necessary which may include the application of sustainable drainage systems. This is likely to have some limited enhancements to water run-off which can reduce the risk of flooding, but cumulative effects are likely to be negligible. Neutral effects are predicted at this stage.

Housing Delivery

- 9.15.10 Policy EN24 sets out the management of water resources, flood risk, drainage, water supply and sewerage as a key consideration to be taken into account in development in Oundle.
- 9.15.11 Policies EN25 - EN28 allocate site options which fall on greenfield land. The urbanisation of these sites could increase the rate of surface water run-off. However, Policies EN26 and EN28 set out requirements for the implementation of sustainable urban drainage, which is likely to improve the rate of discharge which could help reduce the risk of fluvial flooding, especially for the site allocation proposed under Policy EN26 which part falls within and is adjacent to a corridor of Flood Zone 2 and 3 along the River Nene.
- 9.15.12 Policy EN26 requires improvements to the west to east drainage capacity which should further help address fluvial flood risk. Policies EN26 and EN28 are therefore likely to have positive effects.
- 9.15.13 Whilst Policies EN25 and EN27 do not set out measures to include sustainable drainage or other mitigation measures, the scale of the site allocations is unlikely to significantly exacerbate flood risk or water discharge and in the absence of policy requirements, it is likely that some sustainable drainage is implemented as part of a development scheme in accordance with common practice and national planning policy (and JCS requirements).
- 9.15.14 Policies EN29 - EN31 do not propose measures specific to flood risk and neutral effects are anticipated.
- 9.15.15 Overall, the constraints of flood risk in small-scale housing development are recognised through the housing delivery policies. The policies seek appropriate mitigation where necessary, particularly through the use of sustainable drainage systems which can support improved attenuation rates in the long-term. As a result, minor long-term positive effects are possible.

Delivering Sustainable Urban Extensions

- 9.15.16 The policy does not set out any measures to directly address the impact of flooding. The proposed urban extension falls on agricultural land and with masterplanning in place it is assumed that development will provide sustainable drainage to reduce its impact and support improved attenuation rates in the long-term. Additional indirect benefits for drainage are likely as a result of further provisions for a park, allotment, cemetery and green space which should provide important natural drainage spaces. Overall, neutral effects are predicted in relation to the objective.

Town Strategies

- 9.15.17 Policies EN34, EN36 - EN39 and EN42 are likely to have neutral effects in relation to natural hazards with no measures proposed specifically relating to flood risk.
- 9.15.18 Policy EN35 allocates a site which falls within Flood Zone 2. Whilst the redevelopment of this town centre site could likely be delivered through sensitive design, the policy does not set out any measures to mitigate potential adverse effects of development. Guidance is provided through the provisions of the JCS, Policy 5 in particular, which should ensure no significant effects arise. A potential for minor negative effects is identified at this stage, and

it is recognised that additional provisions seeking flood risk management on-site in Policy EN35 could help secure an overall neutral effect in development.

- 9.15.19 Policy EN40 allocates a site which falls within Flood Zone 3 but seeks to restrict development other than employment use which are considered to be compatible in an area at risk of fluvial flooding. The policy further requires development proposals to include appropriate flood risk mitigation measures. Similarly, Policy EN41 allocates a site which falls in Flood Zone 2 but is near an area of Flood Zone 3 and the policy requires appropriate mitigation measures.
- 9.15.20 Overall, whilst flood constraints exist at some of the proposed town centre regeneration sites, it is considered that suitable mitigation is largely in place to deliver neutral effects. However, additional flood risk provisions within Policy EN35 could be beneficial.

Cumulative effects

- 9.15.21 The strategic coordination of growth through the JCS has largely explored and minimised the effects in relation to flood risk. The additional provisions of the Local Plan do not undermine the strategic directions or add any significant enhancements in this respect. Therefore, no significant cumulative effects are considered likely. There are some minor positive effects associated with the ENLP policies, but also development located in areas at risk of flooding (albeit, these areas are already built-up). On balance, **neutral effects** are predicted.

9.16 Soil and Land

SA Objective: Ensure the efficient use of land and maintain the resource of productive soil.

Spatial Development Strategy

- 9.16.1 Policies EN1 - EN6 set out settlement boundaries and a number of measures which restrict development in areas that do not resonate with built-up areas. This is likely to encourage higher densities of development on sites within built-up areas which could have positive effects through the efficient use of land resources. This should also increase the viability of previously developed land in urban areas which should support the reuse of these sites. This is also likely to divert development away from open countryside and important land resources for agricultural use. Cumulatively, these policies are likely to have minor positive effects on the soil and land objective.

Natural Capital

- 9.16.2 Policies EN7 - EN9 seek to protect and enhance the quality and quantity of green infrastructure including the protection of soils and tree planting and the allocation of a 'greenway'. Requirements to improve the quality of green infrastructure and measures to safeguard urban soil quality should have some positive effects on the quality of soil resources in urban areas. However, it is unlikely that these soil resources could be substantially utilised for farming activities and therefore only minor positive effects are predicted in regard to land and soils.
- 9.16.3 Policies EN10 and EN11 set out requirements for the enhancements to existing and the provision of new open and recreational spaces. Whilst requirements for open space in residential developments could add pressures to land resources, these effects are not predicted to be significant and could be addressed through adequate management of site densities.

Social Capital

- 9.16.4 Policies EN12 - EN16 are likely to have neutral effects on soil and land resource due to the policy not having direct effects on the objective.
- 9.16.5 Policy EN17 allocates land to the west of Moulton College for the development of a new school. The greenfield site falls within agricultural land and there is some evidence on site to indicate use for sheep grazing. However, the cumulative loss of greenfield and agricultural land is considered to be negligible and thus neutral effects are predicted.

Economic Prosperity

- 9.16.6 Policies EN18 - EN23 broadly relate to economic development and town centres and thus are likely to have neutral effects on the soil and land objective.

Housing Delivery

- 9.16.7 Policies EN24 - EN27 set out a number of housing allocations in Oundle.
- 9.16.8 Stoke Doyle Road – This is wholly Grade 3 agricultural land that appears to be in use as arable fields. Whilst a loss of this resource is negative, it is only small in scale (3.5ha), and so effects are minor.
- 9.16.9 Cotterstock Road - This is wholly Grade 3 agricultural land that appears to be in use as arable fields. Whilst a loss of this resource is negative, it is only small in scale (3.5ha), and so effects are minor.
- 9.16.10 St Christopher's Drive – This is wholly Grade 3 land, but is not in active use and appears to be of a lower land grade. Therefore, despite a loss of 5ha of land, the effects would be neutral.

- 9.16.11 In total, approximately 13.5 ha of grade 3 land would be lost. However, only 8.5ha appears to be in productive use for agriculture (crops). Whilst this is a permanent loss of such resources, only minor negative effects are predicted given the low magnitude involved.
- 9.16.12 Policy EN28 allocates a site to the east of Rushden. The majority of the site falls within Grade 3 agricultural land and there is evidence of the site being in arable agricultural use. This is likely to result in the permanent loss of 11.7 ha and thus minor negative effects are predicted.
- 9.16.13 Policies EN29 - EN32 are likely to have neutral effects on soil and land resource due to the policies not having direct effects on the objective.

Delivering Sustainable Urban Extensions

- 9.16.14 The SUE development is likely to result in a permanent loss of agricultural land (as identified in the SA for the JCS). However, this is not attributable to the ENLP. Indeed, the ENLP sets out requirements for development proposals to include allotments, which should help mitigate some adverse effects on the loss of productive soil. This is therefore a positive policy in terms of land and soil.

Town Strategies

- 9.16.15 Policies EN35 - EN42 support the redevelopment of brownfield sites within urban areas. These policies are predicted to have a minor positive effect, as they seek to maximise opportunities for the reuse of brownfield land. There is also potential for the redevelopment of former factory or industrial sites to support the remediation of potentially contaminated land.
- 9.16.16 Although, the policies do not set out any measures to ensure these effects. The redevelopment of most of these sites for housing and the potential integration of sustainable drainage (although not required by these policies) has potential to result in some long-term improvements to the quality of soil on these sites, although these effects are uncertain.

Cumulative / overall effects

- 9.16.17 The plan policies are predicted to have mostly neutral effects on the soil and land objective as there are no direct links. However, several policies seek to define and contain development within built-up areas and others support the redevelopment of brownfield sites. There are also specific policies that ought to have benefits for soil and land by supporting allotments, and green infrastructure. Cumulatively, this constitutes **minor positive effects**.
- 9.16.18 A number of policies which allocate housing sites in Oundle and Rushden are predicted to have some **minor negative effects** from the loss of greenfield and agricultural land, some of which appears to be in use. However, cumulatively the scale is not considered to be significant.
- 9.16.19 On balance, **neutral effects** are predicted overall, with some gains and some losses in relation to soil and land in different parts of the district.

9.17 Minerals

SA Objective: Ensure the efficient use of minerals and primary resources.

Spatial Development Strategy

- 9.17.1 Supporting infill development and maintaining settlement boundaries helps to direct development away from areas that are safeguarded for minerals in the open countryside. These are likely to have minor positive effects, as the effects are positive but are not predicted to be significant as these are established policy practices. Furthermore, mineral extraction is broadly considered to be unsuitable in close proximity to built-up areas due to amenity issues. Therefore, any amendments to settlement boundaries which fall in proximity to mineral resources is unlikely to have any adverse effects, as these resources may not be commercially extractable in any case.

Natural Capital

- 9.17.2 These policies are likely to have neutral effects upon the use of mineral resources due to the policies not having direct effects on the objective. It is unlikely that commercially viable mineral resources would overlap with small areas of open space or green infrastructure links through urban areas.

Social Capital

- 9.17.3 Policy EN12 is likely to have neutral effects upon the use of mineral resources due to the policy not having direct effects on the objective.
- 9.17.4 Policies EN13 - EN15 include a number of design requirements including the use of appropriate materials which resonate with the built character of the local area. This could increase some demand for certain minerals, but cumulatively these effects are likely to be negligible as the policies do not diverge significantly from the basis pre-established through national planning policy and the magnitude of any increase in demand is also likely to be small. Therefore, neutral effects are predicted.
- 9.17.5 Under Policy EN16, whilst support for tourism related developments and accommodation in open countryside has potential to cause the sterilisation of some mineral resources. These effects are predicted to be minor and uncertain as the potential effects are dependent on the nature and location of development which may come about during the plan period. Overall, a neutral effect is predicted.
- 9.17.6 Policy EN17 allocates a site for the provision of a new school. The site falls out of areas known to include mineral reserves, but its development would result in the loss of greenfield land. Overall, a neutral effect is predicted.

Economic Prosperity

- 9.17.7 Policies EN18 - EN20 are likely to have neutral effects upon the use of mineral resources due to the policies not having direct effects on the objective. Broadly speaking though, the retention of existing employment areas and town centres ought to reduce pressure on land outside of urban areas that might contain mineral resources.
- 9.17.8 Policies EN21 - EN23 seek to strengthen the role of town and local centres as hubs for mix-use growth which should increase their viability and vitality. This should indirectly support the further agglomeration and higher densities in these areas, which should reduce pressures on sites options beyond the existing built-up area which could add pressures to land including mineral resources. However, these effects are likely to be negligible and neutral effects are predicted overall.

Housing Delivery

- 9.17.9 Each of the sites under policies EN24 - EN27 fall in Mineral Safeguarded Areas for sand and gravel. Whilst resources theoretically exist in these areas, it is unlikely that such minerals would be extracted given the nature and location of these sites. Therefore, neutral effects are predicted.
- 9.17.10 Policy EN28 allocates a site to the east of the A6 in Rushden which falls outside MSAs but would require the use of some greenfield land. A neutral effect is predicted.
- 9.17.11 Policies EN29 - EN32 will have neutral effects upon the use of mineral resources as they relate to the type of housing development rather than its development or use of materials.

Delivering Sustainable Urban Extensions

- 9.17.12 The policy does not elaborate on the JCS in relation to minerals, which is appropriate given that the site area falls outside MSAs. A neutral effect is predicted.

Town Strategies

- 9.17.13 Policies EN35 - EN42 allocate a number of brownfield site options within urban areas and thus are not predicted to directly influence the sterilisation of mineral resources. Some of the site allocations include buildings and structures which would likely require demolition and their materials recycled as secondary aggregates, reducing some pressures for the extraction of mineral resources and the depletion of mineral reserves. Therefore, these policies are likely to have minor positive effects.

Cumulative effects

- 9.17.14 Most of the policies do not seek to directly influence the provision or efficient use of mineral and primary aggregate resources.
- 9.17.15 Some policies could have minor benefits in relation to the protection of mineral resources, but these effects are negligible from a district perspective. Likewise, though some allocated land overlaps with MSAs, the magnitude is low, and it is also unlikely that winnable resources would be affected.
- 9.17.16 Therefore, overall, the plan is predicted to have **neutral effects** upon minerals.

9.18 Waste

SA Objective: To reduce waste arising and increase reuse, recycling and composting.

Spatial Development Strategy

- 9.18.1 Policies EN1 - EN6 are likely to have neutral effects on waste as the level of growth has already been determined and planned for through the JCS and the policies do not propose any additional measures directly relate to the objective.

Natural Capital

- 9.18.2 Policies EN7 - EN11 are likely to have neutral effects on waste as the policies do not directly relate to the objective.

Social Capital

- 9.18.3 Policies EN12 - EN17 are likely to have neutral effects on waste as the policies do not directly relate to the objective. Whilst Policy EN13 requires the use of appropriate materials, it does not set out which materials would be suitable or their composition and therefore effects are likely to be negligible. Similarly, the policy requires development to provide adequate space for waste management but does not set out any standards to reduce the production of waste or to encourage recycling and therefore does not directly influence or have any significant effects on the objective.

Economic Prosperity

- 9.18.4 Policies EN18 - EN23 are likely to have neutral effects on waste as the policies do not directly relate to the objective.

Housing Delivery

- 9.18.5 Policies EN24 - EN32 are likely to have neutral effects on waste. Whilst increased waste arisings can be anticipated in development, the overall level of growth has been determined and planned for through the JCS. The additional allocations are small-scale and seek to meet the residual outstanding needs at Oundle, Rushden and Irthlingborough.

Delivering Sustainable Urban Extensions

- 9.18.6 As before, the Rushden East SUE has been strategically allocated through the JCS and found acceptable in planning terms. Whilst increased waste arisings can be expected as a result of growth in the District; with the overall level of growth already planned for, Policy EN33 is likely to have neutral effects in relation to waste.

Town Strategies

- 9.18.7 Similar to above, Policies EN34 – EN42 are likely to have neutral effects on waste. Whilst increased waste arisings can be anticipated in development, the regeneration sites are small-scale and unlikely to give rise to significant effects.

Cumulative / overall effects

- 9.18.8 Waste will continue to be planned for at the County level, and additional provisions are provided through the JCS (e.g. Policy 10). The ENLP does not propose any measures which are likely to undermine existing waste planning or provide any significant opportunities for enhancement. As a result, no significant cumulative effects are anticipated.

9.19 Summary of effects

9.19.1 This section sets out a summary of the effects predicted for the Pre-submission ENLP Local Plan Document viewed 'as a whole' (i.e. the cumulative and synergistic effects of the plan policies in combination). A short discussion of the effects is provided alongside an overall 'score'.

SA topic	Score	Summary of effects
Accessibility		In combination, the plan policies could generate significant positive effects . Development is directed to the most accessible locations and support given for enhanced connections both within and beyond the District. Cumulative positive effects can also be anticipated through the strategic and local planning of GI routes that extend the East Northamptonshire Area to create more accessible active travel routes.
Housing		The Plan provides additional support in meeting the housing needs of the wider HMA as determined through the JCS. Cumulative significant positive effects are therefore anticipated.
Health and liveability		As a whole, the plan is likely to bring significant positive effect with regards to health and accessibility. This should be achieved through numerous facets of the plan including the provision of affordable and specialist housing, regeneration in areas needing investment, the creation and enhancement of open space, green infrastructure, and the promotion of active travel and accessibility to key services.
Crime		The regeneration of key town centre sites may contribute to improved community safety and reduce the perception of crime in the district. Overall, a minor positive effect is predicted.
Community		Overall, the Plan is likely to lead to some minor positive effects with regards to community cohesion.
Biodiversity		The additional protections and enhancement measures provided through the Plan are considered likely to lead to minor long-term positive cumulative effects . This relates to the potential to strengthen ecological networks from a locally specific perspective.
Landscape		The focus of growth is in line with the JCS, and alongside policy requirements, ought to have minor positive effects in terms of townscape and landscape.
		Though additional site allocations could lead to some minor negative effects on landscape, the broader policies in the Plan are protective and where regeneration is involved could be positive. In this respect, both minor positive and minor negative cumulative effects are predicted.
Cultural Heritage		Though some development locations are close to or contain heritage assets, there are policy mitigation measures in place that ought to ensure negative effects are minimised and enhancements to the built environment are secured. Several plan policies should also have indirect positive effects on heritage through improvements to the public realm. Overall minor positive effects are predicted in the long term.

SA topic	Score	Summary of effects
Air		The ENLP continues in the vein of the JCS by supporting growth in accessible locations and encouraging an increase in sustainable modes of travel and green infrastructure. Overall, the effects in terms of air quality are predicted to be minor positive in the long term.
Water		The plan is likely to have some indirect minor positive effects through the introduction of green infrastructure or sustainable drainage. The plan policies do not set out any measures to reduce water consumption, encourage water efficiency or to ensure the capacity of available water resources, and so neutral effects are predicted in this respect.
Natural Hazard		The additional provisions of the Local Plan do not undermine the strategic directions or add any significant enhancements in respect of flooding. On balance, neutral effects are predicted.
Soil and Land		On balance, neutral effects are predicted overall, with some gains and some losses in relation to soil and land in different parts of the district.
Minerals		The Plan has limited policy influence on minerals planning. The small scale of growth also means that any overlap with mineral safeguarding areas is insignificant. Overall, neutral effects are predicted.
Energy Use and climate change		The level and distribution of growth has largely been planned for strategically through the JCS, which includes significant strategic growth schemes and SUEs. These schemes across the wider area present opportunities to significantly increase the efficiency of new homes, employment, retail and community development. The continued support provided at the local level is likely to support wider actions to move to carbon neutrality and deliver minor positive effects in this respect.
Waste		Waste will continue to be planned for at the County level, and additional provisions are provided through the JCS (e.g. Policy 10). The ENLP does not propose any measures which are likely to undermine existing waste planning or provide any significant opportunities for enhancement. Therefore, neutral effects are predicted.
Employment, Wealth creation and skills		The plan sets out a strategy to deliver economic development throughout the district with a focus on protecting and enhancing town centres and existing employment areas. The plan further seeks to provide new educational provision in the district and safeguards a site for the development of a new secondary school. This builds on the strategic commitments of the wider JCS. Whilst there is some loss of employment land likely to occur, this is outweighed by the benefits of regeneration opportunities. Therefore, cumulatively the plan policies are predicted to have minor positive effects with regards to wealth creation and employment. The provision of new education facilities in identified locations is predicted to have significant positive effects in terms of education.

SA topic	Score	Summary of effects
Town centres		<p>The Local Plan supports the strategic directions of the JCS to deliver growth in the main towns and urban areas. The combined policy frameworks seek to both enhance and protect the vitality and viability of town centres, including through new uses, regeneration and an element of housing provision (delivered through the Local Plan). As a result, significant positive effects are predicted</p>

9.20 Mitigation and enhancement

- 9.20.1 The Sustainability Appraisal (SA) of the East Northamptonshire ENLP Local Plan has been an iterative process, in which proposals for mitigation and enhancement have been considered at different stages.
- 9.20.2 A site appraisal process was undertaken to identify constraints and opportunities for different site options. As part of this process, measures were identified to aid in mitigation and enhancement.
- 9.20.3 Draft versions of each plan policy were also appraised through the SA process, and recommendations were made for improvements before the policies were finalised in the Plan.
- 9.20.4 Table 9.1 below sets out additional measures that have been identified in the latest iteration of the appraisal process. The Council will consider and take account of these recommendations before finalising the Plan.

Table 9.1 - Mitigation and enhancement measures

SA Objective	Recommendations
Communities	Given the history of the site under Policy EN40, it might be appropriate to explore whether reference can be made to Nene Park / Rushden and Diamonds, to remember the legacy of the football club (which was important to members of the community). This might be through public art, commemorative plaque for example.
Climate Change	Identify areas suitable for wind energy development. Ensure that new development can be retrofitted easily with low carbon technologies if it is not implemented at the time of development.
Biodiversity	Provide a detailed tree planting target that development must contribute towards: This would help in achieving net gain and in terms of climate change mitigation and adaptation.
Wealth creation / Community / Accessibility	Ensure that all development is capable / ready of being served by super high-speed broadband.
Health and Livability	Covid 19 and potential future pandemics - The plan could introduce measures that seek to ensure that places are well designed in the context of allowing social distancing, access to greenspace, and alternative ways of working and interacting.
Town Centres	Policy EN41 requires redevelopment proposals for the former hotel in Oundle to include a scheme which results in improved pedestrian and cycle connectivity to the town centre. Whilst in principle this is positive, the town centre is spatially distant to the site allocation and the scope and viability for the redevelopment of the site allocation to achieve such improvements are unclear. The policy could be enhanced with further clarity in this respect.

9.21 Summary and monitoring

- 9.21.1 There is a requirement to outline the measures envisaged to monitor the predicted effects of the Plan. In particular, there is a need to focus on the **significant effects** that are identified. It is important to track predicted effects to ensure that positive effects are realised and to identify any unforeseen negative effects that may occur.
- 9.21.2 Table 11.2 below sets out monitoring measures under each SA Objective which are intended to be used to monitor any significant effects and to track the baseline position more generally. At this stage the monitoring measures have not been finalised, as there is a need to confirm the feasibility of collecting information for the proposed measures. Wherever possible, measures have been drawn from the Local Plan monitoring framework to reduce duplication.
- 9.21.3 The monitoring measures will be finalised once the Plan is adopted and will be set out in a SA Statement in accordance with the SEA Regulations.

Table 9.2 - Monitoring the effects of the Plan

Significant effects	Potential monitoring measures
<p>Accessibility</p> <p>Significant positive effects through a focus on sustainable locations for growth, sustainable travel and securing a greenway and other GI networks.</p>	<ul style="list-style-type: none"> • Length of new cycle infrastructure secured. • Progress on delivery of GI networks and the Greenway • % of new developments within 400m from a bus/rail stop.
<p>Housing</p> <p>Significant positive effects due to meeting JCS targets and providing flexibility</p>	<ul style="list-style-type: none"> • Annual delivery of housing by settlement compared to targets
<p>Health and Livability</p> <p>Significant positive effects due to a range of social infrastructure and environmental improvements</p>	<ul style="list-style-type: none"> • Number of affordable and specialist homes delivered • Net change in open space and green infrastructure provision • Developer contributions secured for public realm improvements. • Rates of active travel
<p>Skills and education</p> <p>Significant positive effects related to new school site allocation.</p>	<ul style="list-style-type: none"> • Progress on the delivery of new schools
<p>Town Centres</p> <p>Significant positive effects with regards to regeneration and focus on the vitality of town centres.</p>	<ul style="list-style-type: none"> • Progress on delivery of town center regeneration sites • Number and % of vacant properties in centres

Part 3: What happens next?

10. Introduction (to Part 3)

10.1.1 The aim of this section is to explain next steps in the plan-making / SA process.

Next steps

10.1.2 This SA Report will accompany the Publication Draft (Pre-Submission) document for public consultation in January – March 2021. Any comments received will be reviewed and taken into account as appropriate as part of the iterative plan-making and SA process.

10.1.3 It is intended that the Plan, accompanied by the SA, will be submitted for examination in Summer 2021. The examination, including hearings, is expected to take place over the Autumn of 2021.

10.1.4 It may be necessary to undertake further SA tasks as the Plan moves towards and through the Examination in Public process. Any findings would be presented in an update to the SA Report and / or through SA Report Addendum.

Appendices

Appendix I: Scoping Report

Appendix II: Oundle Strategic Options Assessment

1.1 Accessibility

Option 1: Draft Plan Allocations	*	Option 2: Neighbourhood Plan Allocations	**
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Option 1

- 1.1.1 *Stoke Doyle Road* - In terms of accessibility, there is a relatively frequent bus service that is located approximately 700m from the development site. However, access would be from a single track lane, which might not support effective access for cars, though provision for walking and cycling could be accommodated. The scale of the site could potentially allow for contributions towards highways improvements.
- 1.1.2 *Cotterstock Road* - This site is located to the north of the town, relatively further away from the town centre. This is likely to increase the number of trips made by car. In terms of accessibility to local services, there are schools nearby, which improve its performance somewhat. Though the site is 1.4km to the nearest bus stop; a frequent service runs to Peterborough, Corby and Northampton. The scale of the development could also potentially support public transport improvements.
- 1.1.3 *St Christopher's drive* - This site is located to the west of the town, relatively close (800m) to the town centre. Therefore, the number of trips generated could be predicted to be lower for local trips. In order to access the A605 and Corby to the east traffic is likely to pass through the town centre, leading to a slight increase in congestion within the town. In terms of accessibility to local services, there are schools nearby, which improve its performance somewhat. Access for this site is likely to run link through the current St Christopher Drive housing estate. This will lead to an increased number of trips, especially during peak hours, as the Prince William primary school is located nearby but accessed through the estate, then along Ashton, East, South and Herne Road. Though it is recognised that a secondary access is required, this would have the potential to reduce congestion. The scale of the development could potentially lead to small contributions to support public transport.

Cumulative effects

- 1.1.4 All of the sites are on the edge of the built up area of Oundle, therefore the means of transport will be more heavily weighted towards the use of the private car. However, the sites are located within walking distance of some local services, and are not too distant from the town centre. This reduces the need to travel outside of Oundle. At St Christopher's Drive and Cotterstock Road, there would be the potential to improve pedestrian links to recreational facilities also.
- 1.1.5 On balance, it is predicted that, with mitigation, **minor negative effects** will occur with regards to the amount of traffic in the area. Whilst there is a range of local services, it would still be necessary for residents to travel outside of Oundle for certain goods and services.

Option 2

- 1.1.6 *Site 19 -Policy 0.19 - Land East of St Christopher's Drive* - The effects are predicted to be similar to those predicted for the same site under Option 1. However, the lower level of development involved would reduce the impact,
- 1.1.7 *Site 20 -Policy 0.20 - Land South of Herne Road* - This site is likely to have access issues due to the current access to the site via a single track lane (Herne Road). This may struggle to accommodate additional trips from new residential accommodation in this location. Additionally, the A605 runs along the east of the site, however it would be considered dangerous to create an access road off this fast moving A road. With regards to services, the site is well located with regards to schools and recreation, but less so in terms of walking to the town centre.
- 1.1.8 *Site 21 - Policy 0.21 - Millers Field, Benefield Road* - Current access is off the A427 (Benefield Road) via a narrow single track, therefore this would need to be widened in order to accommodate development of this scale in this location. However, in terms of walkability, this site is well connected to the town centre via a footpath on both sides of the road, one wide enough to accommodate pushchair access.
- 1.1.9 *Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road* - In terms of accessibility, there is a relatively frequent bus service that is located approximately 700m from the development site. However, access would be from a single track lane, which might not support the most effective access for cars, walking and cycling. The scale of the site could potentially allow for contributions towards highways improvements though.
- 1.1.10 *Site 23 - Policy 0.23 - Land South of Wakerley Close* – Currently this site is landlocked and there is no access route, unless the neighbouring landowner sells off some land to generate an access road. With regards to accessibility, the site is also fairly distant from the town centre.
- 1.1.11 *Site 24 - Policy 0.24 - Land North of Benefield Road* – This site is significantly disconnected from the current town centre along A427 (Benefield Road). There would be a need to create a new access road along this fast moving A road and would increase the number of trips into the town centre from a peripheral site. With regards to accessibility, the site is also fairly distant from the town centre.
- 1.1.12 *Site 25 - Policy 0.25 - Land East of Cotterstock Road* - The effects are similar to those identified for this site as discussed under Option 1. However, the scale of development is much lower. This would reduce impacts with regards to car trips, but would also mean that improvements to walking and cycling infrastructure were less likely to be significant or indeed provided.

Cumulative effects

- 1.1.13 In combination, the effects on congestion throughout Oundle are unlikely to be significant, as the overall scale of growth is relatively low. That said the approach to allocation does leave open the potential for development to be of a higher level than the Neighbourhood Plan proposes due to uncertainty around achieving lower site densities and site allocations that do not necessarily respect natural physical site boundaries.
- 1.1.14 Furthermore, development is dispersed, and some trips will be made locally, possibly by walking and cycling.

1.1.15 Access to services varies in terms of walking and cycling, and public transport links are broadly accessible. However, as with Option 1, the sites are located mostly at the urban fringes, and would be likely to generate more car trips. In this case, two of the sites are more disconnected from the built up area (North of Benefield Road and South of Herne Road), and some sites have access difficulties. Therefore, moderate negative effects are predicted (though these still ought not to be significant).

1.2 Housing

Option 1: Draft Plan Allocations	+++	Option 2: Neighbourhood Plan Allocations	+ ?
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Option 1

- 1.2.1 For Option 1, each of the sites involved are discussed in turn below, followed by a summary of the combined effects.
- 1.2.2 *Stoke Doyle Road* - The emerging Local plan site assessment states that the site provides a good opportunity to meet the strategic housing shortfall identified in the Joint Core Strategy. Whilst the site will require some mitigation measures, there are no significant constraints to development and it is an actively promoted site that is deliverable within the plan period. The longer term development potential is already recognised in the current Local Plan (RNOTP paragraph 8.18); such that the allocation of the site in the replacement Local Plan Part 2 would represent a logical continuation to the adopted policy. This would lead to a fairly significant housing number (70 dwellings) of which 40% should be affordable, in line with policy 15 – sustainable housing provision, leading to a greater housing mix in Oundle.
- 1.2.3 *Cotterstock Road* - This site has the capacity to house 130 dwelling which would reach the threshold to meet affordable housing Policy 15 (sustainable housing provision) of the Joint Core strategy; generating 40% affordable housing provision. Due to the scale of the site a greater mix of housing types and tenures could also be developed on the site, which is likely to contribute to meeting the demands of a wider proportion of the community within Oundle.
- 1.2.4 *St Christopher's Drive* - The emerging Local plan site assessment states that this site provides a good opportunity to meet the strategic housing shortfall identified in the Joint Core Strategy. Whilst the site will require some mitigation measures, there are no significant constraints to development. This site would also have the potential to generate a fairly large number of affordable dwellings on site within a fairly close proximity (less than 800m) to Oundle town centre; which makes this location more desirable for a large proportion of the community as there is much less dependence on the private car or reducing in-accessibility.

Cumulative effects

- 1.2.5 Development at these three sites creates an opportunity to deliver a greater mix of housing types and tenures to meeting the community needs. Each site would reach the affordable housing threshold, therefore resulting in each site (if viable) resulting in a 40% provision of affordable housing. The sites are all considered to be deliverable, and are of a scale that would support new infrastructure provision. As a consequence, **significant positive effects** are predicted for Option 1.

Option 2

- 1.2.6 For Option 2, each of the sites involved are discussed in turn below, followed by a summary of the combined effects.
- 1.2.7 *Site 19 -Policy 0.19 - Land East of St Christopher's Drive* – The effects of this site will be similar to those discussed for St Christopher's Drive under Option 1.
- 1.2.8 However, the neighbourhood plan site is proposed to be split into two parcels with the first being developed within the plan period and the second phase to be developed

post the local plan period (post 2031). Nevertheless, the scale of development would still support affordable housing provision.

- 1.2.9 *Site 20-Policy 0.20 - Land South of Herne Road (45 dwellings)* - This site is proposed to deliver 45 dwellings, predominantly for retirement and self-contained houses. Having an allocated site to deliver housing for the elderly will help to diversify the housing mix in Oundle and meet the needs of the ageing population. The site has not been promoted for development in its current form though, and so it is uncertain whether it would be developed as proposed.
- 1.2.10 *Site 21 - Policy 0.21 - Millers Field, Benefield Road (12 dwellings)* - This site is also allocated mainly for smaller housing units to suit the needs of the ageing population, which is likely to help meet the needs of the local community. However, due to the smaller nature of the site, there is a reduced chance of the site delivering a proportion of affordable dwellings.
- 1.2.11 *Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road (50 dwellings)* - The site has similar effects to the Local Plan site proposal for Stoke Doyle Road, but it involves 50 residential units, as opposed to 70 dwellings. This would result in a lower provision of affordable housing and less scope to deliver a greater mix of housing type and tenures.
- 1.2.12 *Site 23 - Policy 0.23 - Land South of Wakerley Close (10 dwellings)* - This site is proposed for executive homes, which would cover a larger footprint, resulting in lower density and less affordable homes to those in need within the town. However this site will still deliver homes to add to the propped target for the area (albeit a very small number).
- 1.2.13 *Site 24 - Policy 0.24 - Land North of Benefield Road (120 dwellings)* - Proposals for this site set to deliver 120 larger homes (executive homes) which in conformity with policy S15 will deliver 40% affordable housing. This type of housing could draw professionals into the area that could in turn support a strong economy within the town and surrounding area. However, the mix of housing is likely to be lower, and less beneficial to those with affordability problems.
- 1.2.14 *Site 25 - Policy 0.25 - Land East of Cotterstock Road* - Proposes 30 dwellings, which is likely to provide a small number of affordable dwellings alongside the market dwelling provision. The site has not been promoted for development in its current form though, and so it is uncertain whether it would be developed as proposed.

Cumulative effects

- 1.2.15 Overall **minor positive effects** are predicted for housing through growth Option 2, (although potentially negative impacts are highlighted below). The reasons that the effects have not been identified as significant are as follows:
- 1.2.16 A proportion of development is proposed on sites that are not being promoted in their current form. This could lead to these sites not coming forward, and therefore the housing target may not be met in full.
- 1.2.17 A number of the sites are smaller in scale and do not present the opportunities to deliver affordable housing, or a greater mix of housing.
- 1.2.18 Some proposals do not appear to make for the most efficient use of land as required by the NPPF, which could prevent positive effects being achieved.

1.3 Health & Liveability

Option 1: Draft Plan Allocations	+	Option 2: Neighbourhood Plan Allocations	++
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Overview

- 1.3.1 Oundle has been identified as an area within Northamptonshire that currently has poor or no access to significant (>20Ha) accessible natural greenspace (June 2014). A loss of land that is used for recreational purposes would therefore be negative, whilst creation of new or enhanced facilities would be positive.
- 1.3.2 From a health care perspective, there is one healthcare centre, which houses several GP practices. This is relatively accessible to residents in Oundle, though from certain areas, access by car is more likely. Development would be expected to contribute towards health care provision as necessary, but at the overall scale involved, it is unlikely that entirely new facilities would be supported.
- 1.3.3 Each site is discussed in turn below under the two Options.

Option 1

- 1.3.4 *Stoke Doyle Road* - This site is fairly well connected to the town centre and has a footpath connecting the site directly to the town. Due to the size of the site, it is unlikely that new sport/health facilities could be provided on site, but there would be no loss of existing recreational land. However, there may be opportunities to enhance the current footpath, encouraging healthy means of travel. Enhancements to the nearby POW are expected to be made which will link the site to the nearby footpath network, increasing walkability to both the town and the nearby bus stop. With regards to amenity, there may be some concerns from neighbouring residential areas about the loss of open space in this area, but this is a minor issue.
- 1.3.5 *Cotterstock Road* – Development will lead to the loss of agricultural land, rather than an area that is used for formal recreation. The site is in close proximity to health facilities, and could encourage walking and cycling through improved connections to the Nene Valley and nearby villages (e.g. Cotterstock, Glaphorn and Tansor). Additionally, the site is close to the bus stop and shops in the town centre, which could encourage active travel. This site is also like to incorporate new structural landscaping to the north of the site to mitigate the impacts of smell and other pollution (created by the sewage works) in turn creating a more attractive environment to those who live there.
- 1.3.6 *St Christopher's Drive* - This site is located on the eastern edge of the town, bordered by the A605 to the east and Prince William School to the south west. It is unlikely that this site is large enough to create new sports/open space; however this site is within close proximity to current sports and leisure facilities within the town, and is well connected via a walkable footpath linking directly to the town centre, and could potentially link to strategic green infrastructure corridors such as along the Nene Valley.
- 1.3.7 Due to the site being located next to the A605, there could be potential amenity concerns for residents, but it is expected these would be mitigated to secure attractive development.

Cumulative Effects

- 1.3.8 Development of these sites is unlikely to create new provision for health and leisure facilities. However, given the larger nature of the sites, there is potential to incorporate new open space provision or play facilities on sites if necessary. There should also be good potential to improve public footpaths and links to the surrounding countryside, which could help to improve wellbeing. The sites are all within a reasonable distance to the current GP site, and so access to services ought to be good.
- 1.3.9 There could be some minor negative effects associated with development, such as a loss of greenspace, visual amenity, and disturbance during construction.
- 1.3.10 On balance, **minor positive effects** are predicted. The negative effects are unlikely to be widespread or long lasting, and are offset by positive effects. The positive effects are unlikely to be significant though, and not substantially greater than would be the case in the absence of allocated sites.

Option 2

- 1.3.11 *Site 19 - Policy 0.19 - Land East of St Christopher's Drive* -The effects are predicted to be similar to those identified for this site under Option 1. However, as the scale of development is slightly lower, the effects would be less prominent. In particular, effects associated with the A605 would be lower in the plan period, as the eastern part of the site would not be developed.
- 1.3.12 *Site 20-Policy 0.20 - Land South of Herne Road* - This site is proposed to provide approximately 4ha of land for recreational or sports uses which could also be facilities used by Prince William School. This would enhance the current community facilities, having benefits for new and existing residents. In addition, this site should lead to the upgrade of footpath UF7 along the development site boundary and create a new footpath which links to footpath UF6 as part of the Oundle Circular Route. There are also good opportunities to link to strategic green infrastructure networks such as along the River Nene. From a negative perspective, access to the site could lead to amenity concerns for residents along Herne Road, and it could also affect road safety near the school.
- 1.3.13 *Site 21 - Policy 0.21 - Millers Field, Benefield Road* - The policy proposes that half of the site (approximately 0.55Ha) is pre-provided for allotments and informal, public recreational space, with the overall vision to ensure that views into the open countryside from Benefield Rd are preserved, in turn adding the amenity of the site and health and wellbeing of residents by provision open space. The informal recreational space shall be provided as a landscaped area along the brook and a cycle and pedestrian route shall be provided between the informal recreational space and Benefield Road, linking to the town centre (500m distance).
- 1.3.14 *Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road* - This site is predicted to have broadly the same effects as those predicted for the same site under Option 1.
- 1.3.15 *Site 23 - Policy 0.23 - Land South of Wakerley Close* - Due to this site being allocated for executive houses with large garden spaces this is likely to lead to improvements to the liveability for those residents, but this would not provide wider benefits to the community of Oundle. Additionally, access is to be provided to the west of Wakerley Close, along with the upgrade to footpath UF3 creating a usable pedestrian route between Stoke Doyle Road and Benefield Road. The number of residents that would benefit would be really small.
- 1.3.16 *Site 24 - Policy 0.24 - Land North of Benefield Road* - This site is not directly connected to the current built up environment of Oundle. However, the site is seeking to provide

a festival field (approximately 5.5ha) with separate access. Whereby a natural screening and buffer will be provided between the proposed residential area and festival field. Overall, if secured, this is likely to build upon the previous success of festivals being held in the town bringing a secure location for these types of community events to be held for the immediate and surround communities.

- 1.3.17 This site is also within close proximity to a number of sports and leisure facilities. In addition, there are proposals to upgrade footpath UF10 and create a new footpath traversing north east at the boundary of the site to facilitate a link to footpath UF11 as part of the Oundle Circular Route.
- 1.3.18 The site well located to link to strategic Green Infrastructure links, and these proposals would help to achieve this. With regards to wider accessibility, the site is less favourable, as it is at some distance from local facilities and the health centre, and so walking may be less likely to be the favoured mode of transport.
- 1.3.19 *Site 25 - Policy 0.25 - Land East of Cotterstock Road* - The effects are similar to those identified for the same broad site under Option 1. However, the scale of development is much lower, and therefore the effects would be much less pronounced. In particular, there would be fewer impacts on visual amenity. The lower density of development should promote attractive homes that support good health and wellbeing. However, the ability to secure affordable housing and open space improvements would be lower at this scale of development.

Cumulative effects

- 1.3.20 Due to the smaller scale of most the sites selected for development within the neighbourhood plan there will be decreased opportunities for improvements to the current footpaths and health and open space provision within the town. However, there are opportunities for improvement to recreation, particularly at the Benefield Road site.
- 1.3.21 On balance **moderate positive effects** are predicted. Whilst the opportunity for improvements may be lower for most of the sites, there are specific policy requirements proposed that could help to promote benefits for health and wellbeing. This approach has also been prepared through the neighbourhood planning process, and so is likely to better reflect the desires of the local residents. The effects are slightly more positive compared to the local plan approach in terms of wellbeing. However, there are no significant effects identified for either.

1.4 Crime

Option 1: Draft Plan Allocations	0	Option 2: Neighbourhood Plan Allocations	0
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- 1.4.1 None of the proposed sites are likely to lead to effects on crime; therefore **neutral effects** are predicted for both options.

1.5 Community Value

Option 1: Draft Plan Allocations	0	Option 2: Neighbourhood Plan Allocations	+
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- 1.5.1 None of the sites proposed for either option contain community buildings or facilities. In this respect, the effects are likely to be neutral.
- 1.5.2 Though some of the sites may hold some value for informal recreation, the effect on community cohesion and engagement is unlikely to be significant should they be developed for housing.
- 1.5.3 With regards to new facilities, the sites proposed for Option 1 are all relatively large scale, and could possibly involve the creation of new open space, and / or facilities that could contribute towards community development. There are fewer sites under Option 2 that fall into this category.
- 1.5.4 It is important to acknowledge that Option 2 presents a ‘community’ view on the form of development that it wishes to see come forward for Oundle (through the preparation of a neighbourhood plan). Supporting this approach could therefore help to strengthen community engagement and ownership of the area. This would be less so for Option 1, which has not been driven as strongly by community aspirations. **Minor positive effects** are predicted for Option 2, to reflect the role of neighbourhood planning in this instance.
- 1.5.5 The effects for Option 1 are not predicted to be negative though, as there are factors that offset potential dissatisfaction from certain community members (from not pursuing the draft NP approach). For example, the greater potential to secure enhancements to social infrastructure.

1.6 Biodiversity

Option 1: Draft Plan Allocations	?	Option 2: Neighbourhood Plan Allocations	?
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Overview

- 1.6.1 There are no SSSIs or European sites within the immediate vicinity of Oundle, and as such, none of the sites fall within SSSI risk zones. As a consequence, neutral effects are predicted for both options.
- 1.6.2 With regards to locally important wildlife sites and species, each site is discussed below for both options, and then in combination.

Option 1

- 1.6.3 *Stoke Doyle Road* - The site is adjacent to areas that may have value for wildlife such as a watercourse to the north, and a number of hedgerows. Minor negative effects could therefore occur.
- 1.6.4 *Cotterstock Road* - The site is adjacent to areas that may have value for wildlife such as the River Nene to the east, and a number of hedgerows. The scale of development could lead to negative effects, but it should also be possible to introduce buffer areas and enhancement measures given the scale of the site.
- 1.6.5 *St Christopher's Drive* - There are no important biodiversity features at this site, and so neutral effects would be likely. Given the relatively low value of the site, and the size of area, it may be possible to secure enhancements on site.

Cumulative effects

- 1.6.6 Overall, due to 2 of the sites being located adjacent to high wildlife values areas, the cumulative effects of this scale development could lead to minor negative effects, however mitigation measures are likely to be introduced and on sites of this scale whereby enhancements could be made to the current wildlife corridors within Oundle leading to **uncertain effects**.

Option 2

- 1.6.7 *Site 19-Policy 0.19 - Land East of St Christopher's Drive* – There are no important biodiversity features at this site, and so neutral effects would be likely. Notable enhancement is unlikely and so net gain is unlikely on site.
- 1.6.8 *Site 20-Policy 0.20 - Land South of Herne Road* - There are no nearby areas that are designated for wildlife or geological importance, but the site does run adjacent to the River Nene, which is likely to support wildlife. There could therefore be minor negative effects. Mitigation ought to be possible, but it is unclear whether net gains could be achieved on site.
- 1.6.9 *Site 21 - Policy 0.21 - Millers Field, Benefield Road* - The location and scale of site is unlikely to generate effects on biodiversity either positive or negative.
- 1.6.10 *Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road* - The site is adjacent to areas that may have value for wildlife such as a watercourse to the north, and a number of hedgerows. Minor negative effects could therefore occur.

- 1.6.11 *Site 23 - Policy 0.23 - Land South of Wakerley Close (10 dwellings)* - The location and scale of site is unlikely to generate effects on biodiversity either positive or negative.
- 1.6.12 *Site 24 - Policy 0.24 - Land North of Benefield Road (120 dwellings)* - This site contains some hedgerows, but is otherwise not likely to be particularly sensitive from a biodiversity perspective. The scale of the site should allow for enhancements to be secured though, which is potentially positive.
- 1.6.13 *Site 25 - Policy 0.25 - Land East of Cotterstock Road* - The site is adjacent to areas that may have value for wildlife such as the River Nene to the east, and a number of hedgerows. However, the scale of development is small and would avoid these areas, and so neutral effects are likely. With regards to enhancement, the site is small, and would exclude land to the east, which could otherwise have formed part of an enhancement area. Without this falling within the site boundary, it would not be possible to ensure such improvements occurred.

Cumulative effects

- 1.6.14 Due to the scale of the proposed neighbourhood plan sites being a smaller scale this could lead to reduced impact on the biodiversity network, however this is also likely to lead to decreased opportunities to enhance and create new wildlife corridors and biodiversity assets within Oundle. Furthermore, the uncertainty about the delivery of the proposed sites could mean that additional developments come forward, with potential minor negative effects. Therefore, overall **uncertain effects** on biodiversity are predicted.

1.7 Landscape

Option 1: Draft Plan Allocations	✘	Option 2: Neighbourhood Plan Allocations	✘ ✘
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Option 1

- 1.7.1 *Stoke Doyle Road* – The 2018 Oundle site assessment states that this is an area of potential sensitivity, including views within the site on undulating land down to a watercourse. However, the site is bounded on three sides by existing urban uses, and so the effects ought to be possible to screen somewhat.
- 1.7.2 *Cotterstock Road* – The 2018 Oundle site assessment states that this is an area of potential sensitivity, with the site being located on undulating land down to a watercourse (River Nene, to the east). However, the initial assessment was based upon a larger site area (east of the existing built form), which has been excluded from the current site allocation. The eastern part of the site, which slopes down to the river, is the most sensitive part of the site. However, a smaller allocation could overcome this impact. Landscape impact has been identified as the most significant development constraint. This could be addressed through reducing the developable area and suitable landscaping along the most sensitive boundaries. However, minor negative effects are certainly possible.
- 1.7.3 *St Christopher's drive* - The 2018 Oundle site assessments states that development of this site is not likely to lead to significant visual impacts or a loss of important landscape function. This being said, the site is currently greenfield land, and offers a degree of separation between the school and a residential area from the A605. It could therefore have some local value. With screening and landscaping, it ought to be possible to avoid notable negative effects though.

Cumulative effects

- 1.7.4 Overall, **minor negative effects** are predicted. This relates mostly to the development at Cotterstock Road, which is on relatively sensitive land, and would be of a scale that would alter the approach to Oundle from the north. With landscaping measures, effects are unlikely to be significant though. The combined impacts on the settlement are minor when considering all three sites together.

Option 2

- 1.7.5 *Site 19 - Policy 0.19 - Land East of St Christopher's Drive* – The effects are similar to those predicted for Option 1, but a smaller site area is proposed within the plan period.
- 1.7.6 *Site 20 - Policy 0.20 - Land South of Herne Road* - There could be minor negative effects on the landscape setting in this location, as it is relatively open and would bring the urban area into close proximity to the River Nene.
- 1.7.7 *Site 21 - Policy 0.21 - Millers Field, Benefield Road* - Neutral effects are predicted due to the small scale nature of the site within the urban area.
- 1.7.8 *Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road* - As per option 1, the likely effects on landscape are minor, as though the site is open, it is bounded on three sides by built up areas.
- 1.7.9 *Site 23 - Policy 0.23 - Land South of Wakerley Close* - The site is small scale and therefore unlikely to have significant effects on landscape. However, the site is at the

settlement edge in a gateway location, with a rural setting. Minor negative effects could occur.

1.7.10 *Site 24 - Policy 0.24 - Land North of Benefield Road* - Development would be fairly large scale in a gateway location. Though the landscape is not highly sensitive, parts are slightly elevated, and views towards Oundle along Benefield Road would likely be altered. Minor negative effects are predicted.

1.7.11 *Site 25 - Policy 0.25 - Land East of Cotterstock Road* - The site has some sensitivity, but the scale of development is small, and should be better able to avoid negative impacts on landscape character.

Cumulative effects

1.7.12 In isolation, the majority of sites are unlikely to have notable effects on landscape character. Compared to Option 1, the smaller nature of the same proposed sites (Cotterstock Road, Stoke Doyle, St Christopher's Drive), ought to make it easier to avoid negative effects.

1.7.13 However, two additional sites are proposed that could generate negative effects on the character of the landscape (North of Benefield Road and South of Herne Road).

1.7.14 Further, option 2 seeks to cap/ restrict the numbers of dwellings proposed for a range of sites. If a more appropriate density of development or site capacity comes forward this would have the potential for increasing the overall quantum of development proposed in the Neighbourhood Plan across the seven sites identified.

1.7.15 As a consequence, the overall effects are predicted to be **slightly more negative** when compared to Option 1. The negative effects are still not likely to be significant, but they are moderate rather than minor, and there is a greater degree of **uncertainty** compared to Option 1.

1.8 Cultural heritage

Option 1: Draft Plan Allocations	0	Option 2: Neighbourhood Plan Allocations	0
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Option 1

- 1.8.1 *Stoke Doyle Road* - There are no listed buildings or scheduled monuments on this site or within a close proximity to the site. The site is also distant from the Conservation Area, and does not contribute towards the setting of heritage assets. The site is however, adjacent to the Cemetery, which has community value, and a historical relevance to certain people. Development could therefore be perceived as intrusive in this location, which is a minor negative effect. Mitigation such as landscaping with native trees should help to ensure that such effects are minimised.
- 1.8.2 *Cotterstock Road* - There are no listed buildings or scheduled monuments on this site or within a close proximity to the site. It is also distant from the Conservation Area, and does not contribute strongly to the character of the surrounding built environment (which is mostly modern residential development to the south of the site area). Consequently, neutral effects are predicted for this site with regards to cultural heritage.
- 1.8.3 *St Christopher's Drive* - There are no listed buildings or scheduled monuments on this site or within close proximity to the site. It is also distant to the Conservation Area and dominated by the A605. Therefore neutral effects are predicted for this site.

Cumulative effects

- 1.8.4 Each of the sites is unlikely to lead to negative effects on cultural heritage when considered individually. In combination, no cumulative effects would occur either, as the sites are at some distance from one another, and the overall scale of growth across Oundle would not notably alter the character of the built environment and the settlement boundaries. On balance, **neutral effects** are predicted for Option 1.

Option 2

- 1.8.5 *Site 19 - Policy 0.19 - Land East of St Christopher's Drive* - The effects at this site are predicted to be broadly the same as those identified for the same site under Option 1 (i.e. neutral). Though the scale of development in the plan period is lower, the sensitivity of this area is low, and so the effects of higher growth are neutral anyway.
- 1.8.6 *Site 20 - Policy 0.20 - Land South of Herne Road* - There are no listed buildings or scheduled monuments on this site or within a close proximity to the sites. In this respect, no effects are likely. However, along Herne Road there are a number of large dwellings with relatively large amounts of land that help to define this part of the town. Whilst development could have minor negative impacts, a low density approach with similar homes would allow for such character to be retained. So an uncertain effect is predicted.
- 1.8.7 *Site 21 - Policy 0.21 - Millers Field, Benefield Road* - There are no listed buildings or scheduled monuments on this site or within a close proximity to the site. Though the site is in close proximity to the Conservation Area boundary, it is small scale and unlikely to significantly alter the character of the built environment.

- 1.8.8 *Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road* - Similar effects to those discussed for Option 1 are predicted. However, with a slightly lower scale / density of development, the effects ought to be easier to mitigate.
- 1.8.9 *Site 23 - Policy 0.23 - Land South of Wakerley Close* -There are no listed buildings or scheduled monuments on this site or within a close proximity to the site. The scale of development is also very small, and therefore neutral effects are predicted.
- 1.8.10 *Site 24 - Policy 0.24 - Land North of Benefield Road* -There are no listed buildings or scheduled monuments on this site or within a close proximity to the site. Though it is a large site on the edge of the settlement boundary, it would be opposite existing residential development of fairly recent construction. Therefore, effects on cultural heritage are likely to be minimal.
- 1.8.11 *Site 25 - Policy 0.25 - Land East of Cotterstock Road* – Development would have similar effects to those predicted for the same site under Option 1. However, the scale / density of development would be lower, and therefore the potential for negative effects even lower.

Cumulative effects

- 1.8.12 Each of the sites is unlikely to lead to notable negative effects on cultural heritage when considered individually. In combination, no cumulative effects would occur either, as the sites are at some distance from one another and somewhat dispersed across the settlement. The overall scale of growth across Oundle would not notably alter the character of the built environment and the settlement boundaries. On balance, **neutral effects** are predicted for Option 2.
- 1.8.13 With regards to archaeological potential, there would be a need to explore this through the development process under either option.

1.9 Climate Change

Option 1: Draft Plan Allocations	0	Option 2: Neighbourhood Plan Allocations	0
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- 1.9.1 All of the options propose a similar quantum of housing growth and this is predominantly located in similar areas within the town.
- 1.9.2 Option 2 involved a slightly higher level of growth, however this is marginal in terms of the likelihood to generate more carbon emissions and require additional energy to support operations and transportation. The location of development under both option 1 and 2 is likely to lead to increased transportation to access the sites and increase the traffic generated within the town centre and along the main arterial routes leading to Corby and Northampton. However, from a district wide perspective, the effects on the baseline position are unlikely to be notable given the scale of growth involved.
- 1.9.3 None of the options provide any significant additional opportunities to incorporate renewable energy; therefore neutral effects are predicted in this respect.
- 1.9.4 In summary there are no significant differences between the options in terms of climate change and none are likely to have significant effects; the residual effects are predicted to be **neutral**.

1.10 Air Quality

Option 1: Draft Plan Allocations	✘	Option 2: Neighbourhood Plan Allocations	✘
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- 1.10.1 There are no designated AQMA's within East Northamptonshire therefore the Council has not produced any Air Quality Action Plans (AQAPs). As such, the Council has not published any specific measures related to control and mitigation of sources of local air quality issues.
- 1.10.2 Both options will generate the same increase in traffic overall as they propose the same level of growth across Oundle. The magnitude of additional trips would be unlikely to lead to a significant worsening of air quality, and the current ambient levels are not close to exceeding air quality standards.
- 1.10.3 The differences between the options are minimal, as both predominantly involve growth at the settlement edges. For Option 1, there would be a greater focus of growth to the north at Cotterstock Road, whilst for Option 2; there is a greater focus of growth to the west of the settlement and a dispersal of options that would mean some additional impact across a wider area locally. It would be expected that traffic would increase slightly in these immediate locations, but the effect on overall levels of congestion and air quality within Oundle would not be significant. Therefore, only **minor negative effects** are predicted for both options.
- 1.10.4 Each site will generate opportunities to reduce the use of the private car, however they are on the edges of the built up area and residents may still be dependent on the private car.

1.11 Water & Natural Hazard

Option 1: Draft Plan Allocations	x	Option 2: Neighbourhood Plan Allocations	x
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Water quality

1.11.1 Both options involve the same amount of growth, and would therefore create a similar demand for waste water treatment. The scale of growth involved could be accommodated at existing facilities, and so negative effects on water quality ought to be avoidable.

Flooding

1.11.2 With regards to flooding, the sites proposed for each option are discussed in turn below, and then the combined effects are summarised.

Option 1

1.11.3 *Land East of St Christopher's Drive* - The site falls entirely within Flood Zone 1, but there are some quite large areas at high and moderate risk of surface water flooding throughout the site. Whilst development could potentially mitigate such effects, the potential for minor positive effects exists.

1.11.4 *Land Adjacent to Cemetery, Stoke Doyle Road* - The site falls within Flood Zone 1, but is adjacent to areas of Flood Zone 2 and 3. There are no areas of surface water flood risk on site. Overall, the risk of flooding ought to be low at this site.

1.11.5 *Land East of Cotterstock Road* – The site falls within Flood Zone 1, but is adjacent to Zones 2/3 to the eastern boundary. There is no surface water flood risk on site though. Overall, the risk of flooding ought to be low at this site.

1.11.6 Overall, the risk of flooding on the sites is minor, with only one site presenting the potential for negative effects (which should be possible to mitigate). The scale of the sites involved should also allow for sustainable drainage systems to be incorporated, helping to reduce surface water flood risk, and minimise the down-stream impacts. **Minor negative effects** are recorded.

Option 2

1.11.7 *Site 19 - Policy 0.19 - Land East of St Christopher's Drive* – The site falls entirely within Flood Zone 1. But some quite large areas are at high and moderate risk of surface water flooding. This presents the potential for minor negative effects, but mitigation ought to be possible.

1.11.8 *Site 20 -Policy 0.20 - Land South of Herne Road* – An area of flood zone2/3 borders the site but there are no substantial surface water flood risk on site, and the majority of the area falls within Flood Zone 1. Development is therefore likely to have neutral effects.

1.11.9 *Site 21 - Policy 0.21 - Millers Field, Benefield Road* - The site falls into flood zone 1 and there are no areas of surface water flood risk on site. Development is therefore likely to have neutral effects.

1.11.10 *Site 22 - Policy 0.22 Land Adjacent to Cemetery, Stoke Doyle Road* - The site falls within Flood Zone 1, but is adjacent to areas of Flood Zone 2 and 3. There are

no areas of surface water flood risk on site. Overall, the risk of flooding ought to be low at this site.

1.11.11 *Site 23 - Policy 0.23 - Land South of Wakerley Close* – The site falls into flood zone 1 and there are no areas of surface water flood risk on site. Development is therefore likely to have neutral effects.

1.11.12 *Site 24 - Policy 0.24 - Land North of Benefield Road* –The site falls into flood zone 1 and there are no areas of surface water flood risk on site. Development is therefore likely to have neutral effects.

1.11.13 *Site 25 - Policy 0.25 - Land East of Cotterstock Road* – The site falls into flood zone 1 and there are no areas of surface water flood risk on site. Development is therefore likely to have neutral effects.

1.11.14 Overall, the risk of flooding on the sites is minor or neutral (for most sites), with only one site presenting the potential for negative effects (which should be possible to mitigate). The scale of some of the sites involved should also allow for sustainable drainage systems to be incorporated, helping to reduce surface water flood risk, and minimise the down-stream impacts. Though smaller sites would have less potential to deliver such improvements, their scale would be unlikely to cause flood risk issues. Minor negative effects are recorded.

1.11.15 On balance, both options perform relatively the same with regards to water and flooding.

1.12 Soil and land

Option 1: Draft Plan Allocations	✘	Option 2: Neighbourhood Plan Allocations	✘✘
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Overview

1.12.1 Both options involve development on sites that are classified as Grade 3 agricultural land. However, it is uncertain whether this is Grade 3a or 3b. What can be determined though is whether the land is in active use for agriculture or is of a recreational nature / natural space.

Option 1

1.12.2 For Option one each site is discussed briefly below:

1.12.3 *Stoke Doyle Road* – This is wholly Grade 3 agricultural land that appears to be in use as arable fields. Whilst a loss of this resource is negative, it is only small in scale (3.5ha), and so effects are minor.

1.12.4 *Cotterstock Road* - This is wholly Grade 3 agricultural land that appears to be in use as arable fields. Whilst a loss of this resource is negative, it is only small in scale (3.5ha), and so effects are minor.

1.12.5 *St Christopher's Drive* – This is wholly Grade 3 land, but is not in active use and appears to be of a lower land grade. Therefore, despite a loss of 5ha of land, the effects would be neutral.

1.12.6 In total, approximately 13.5 ha of grade 3 land would be lost. However, only 8.5ha appears to be in productive use for agriculture (crops). Whilst this is a permanent loss of such resources, only **minor negative effects** are predicted given the low magnitude involved.

Option 2

1.12.7 For Option two, each of the sites is discussed briefly below:

1.12.8 *Site 19-Policy 0.19 - Land East of St Christopher's Drive* - This site is wholly classified as grade 3 land, but does not appear to be in agricultural use.

1.12.9 *Site 20 -Policy 0.20 - Land South of Herne Road* - This site is wholly classified as grade 3 land, but does not appear to be in agricultural use.

1.12.10 *Site 21 - Policy 0.21 - Millers Field, Benefield Road* - This site is wholly classified as grade 3 land, but does not appear to be in agricultural use.

1.12.11 *Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road* - This is wholly Grade 3 agricultural land that appears to be in use as arable fields. Whilst a loss of this resource is negative, it is only small in scale, and so effects are minor.

1.12.12 *Site 23 - Policy 0.23 - Land South of Wakerley Close* - This site is wholly classified as grade 3 land, but does not appear to be in agricultural use.

1.12.13 *Site 24 - Policy 0.24 - Land North of Benefield Road* – This site is wholly classified as grade 3 land which appears to be in use for grazing. Whilst there would be a permanent loss of this resource, the effects are minor.

1.12.14 Site 25 - Policy 0.25 - Land East of Cotterstock Road – This site is wholly Grade 3 agricultural land that appears to be in use as arable fields. Whilst a loss of this resource is negative, it is only small in scale (1ha), and so effects are minor.

1.12.15 In total, about 15ha of grade 3 agricultural land is likely to be lost under option 2, which would be irreversible. However, only 10ha of land appears to be of the quality to support agriculture, with approximately 5ha appearing to be grazing and 5ha as arable. Overall, this equates to a **minor negative effect**.

Summary

1.12.16 Both options therefore perform very similarly to one another with regards to the effects on agricultural land. Neither would generate significant negative effects.

1.12.17 In terms of the efficiency of land usage, Option 1 performs more favourably, as it involves three large development sites that would be used in their entirety at suitable densities. Option 2 involves a range of smaller sites, in addition to several large sites, but the densities proposed in some locations are lower. Whilst this would result in an overall greater use of greenfield land compared to option 1, the effects are fairly similar.

1.13 Minerals

Option 1: Draft Plan Allocations	0	Option 2: Neighbourhood Plan Allocations	0
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1.13.1 Each of the sites under Option 1 falls into Mineral Safeguarded Areas for sand and gravel. Whilst resources theoretically exist in these areas, it is unlikely that such minerals would be extracted given the nature and location of these sites. Therefore, neutral effects are predicted.

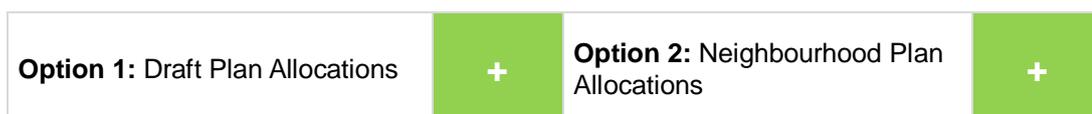
1.13.2 For Option 2, most of the sites also fall within Mineral Safeguarded Areas for sand and gravel, but like for Option 1, the nature and scale of sites would be unlikely to be suitable for extraction. Therefore, **neutral effects** are predicted also.

1.14 Energy Use & Waste

Option 1: Draft Plan Allocations	0	Option 2: Neighbourhood Plan Allocations	0
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- 1.14.1 Both options involve similar levels of housing growth, and so any additional waste or energy use would be unlikely to be notably different for either option. Neither option presents a particular opportunity with regards to the development of low carbon energy schemes either.
- 1.14.2 With regards to waste collection, the distribution of development under either option would be in locations that could be appropriately serviced.
- 1.14.3 Overall, **neutral effects** are predicted for both options with regards to energy and waste.

1.15 Employment & Wealth Creation & Skills



- 1.15.1 For both options, the sites involved are allocated for housing, rather than employment. Therefore, the effects on the creation of jobs are limited (aside from construction related jobs for new homes).
- 1.15.2 The housing sites involved for both options are more suitable for housing, rather than employment, and so there would be no negative effects with regards to land availability for jobs and local business growth.
- 1.15.3 The neighbourhood plan development options include several sites (23 & 24) that are proposed solely for the development of executive homes with larger gardens and net floor space. These are likely to be more desirable / affordable for working professionals who are likely educated and working in management roles. This could lead to a greater wealth creation within Oundle, as these groups have more disposable income to spend in the local economy, to contribute towards Council tax and to generate a greater skilled workforce. This is a minor positive effect.
- 1.15.4 Though the local plan options do not specify that executive homes should be developed, the sites could still be developed as such, and would still support local spending and contributions in Council tax. Therefore, minor positive effects are also predicted.

1.16 Town Centre

Option 1: Draft Plan Allocations	+	Option 2: Neighbourhood Plan Allocations	+?
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- 1.16.1 For both options the sites are not within close proximity to the town centre, and so it is not certain that residents would choose to walk into and use the services on offer. However, an increase in dwellings should help to support the vitality of the town, and with measures in place to support walking and cycling, links into the centre could perhaps be improved.
- 1.16.2 For both options, the sites are at the periphery of the town, with several of the neighbourhood plan options being slightly farther away. Despite this, there is likely to be little difference upon the effects that would be generated with regards to the town centre performance.
- 1.16.3 On balance, **minor positive effects** are predicted for both options. There is a greater degree of uncertainty associated with Option 2 though, as some of the sites proposed may not come forward.

1.17 Summary of effects

SA Topic	Option 1	Option 2
Accessibility	✘	✘✘
Housing	+++	+ / ?
Health and liveability	+	++
Crime	0	0
Community Value	0	+
Biodiversity	?	?
Landscape	✘	✘✘
Cultural Heritage	0	0
Climate change	0	0
Air quality	✘	✘
Water and natural hazard	✘	✘
Soil and land	✘	✘✘
Minerals	0	0
Energy use and waste	0	0
Employment, skills and wealth creation	+	+?
Town centres	+	+

- 1.17.1 The two strategic options perform relatively the same across the range of sustainability topics. This is not unsurprising given that they are in the same settlement, propose similar levels of growth (though option 2 could require additional development), and involve some of the same sites (albeit different boundaries).
- 1.17.2 For both options, neutral effects are predicted for a range of factors, including; minerals, energy use and waste, crime, climate change and cultural heritage.
- 1.17.3 Minor negative effects arise for both options with regards to air quality, water and natural hazards. These issues are more relevant at a settlement scale and pose no particular issue for either approach.
- 1.17.4 For other factors, some differences in the two options can be noticed. In particular, Option 2 is likely to generate more prominent negative effects with regards to the efficient use of land, effects on landscape character and accessibility. However, none of these effects are likely to be significant provided that mitigation measures are secured as proposed.
- 1.17.5 From a positive perspective, each option would have similar benefits with regards to the creation of jobs in construction, an injection of spending into the local economy and town centres, and through wealth creation. However, differences are noted between the approaches for three SA topics. For housing, the Local Plan approach (Option 1) provides a more deliverable approach, and the scale of developments would be better placed to support infrastructure improvements and affordable housing. Therefore, it would have significant positive effects. This contrasts with Option 2, which proposes several sites with deliverability issues that could prevent significant positive effects from being generated. This is quite a critical issue.
- 1.17.6 Where Option 2 does perform more favourably though is in the likely generation of greater positive effects (than option 1) with regards to community development (given that the approach has been developed by the 'community', and also in terms of health and liveability).

