



Open Spaces and Green Infrastructure (policies EN7, EN8, EN10 and EN11)

January 2021

This background paper has been prepared to:

1. Define and explain the proposed approach to the provision of open space in the Local Plan Part 2;
2. Define and explain how the Local Plan Part 2 will address the issue of green infrastructure delivery.

1.0 Introduction and background

- 1.1 The updated (2019) National Planning Policy Framework (NPPF): Achieving sustainable development states that proposals should support strong, vibrant and healthy communities with accessible open spaces, and contribute to protecting and enhancing our natural environment, including making effective use of land. Paragraphs 96-97 set out the importance of sport and physical activity for the health and wellbeing of communities and that the provision and retention of existing informal and formal open space should be sought.
- 1.2 This national policy enables the designation of open space through Local Plans and/ or Neighbourhood Plans. Open space can provide a number of functions: the location for play and recreation; a landscape buffer for the built environment and to provide a habitat for biodiversity. It can also provide an attractive feature, forming a major aspect of the character of a settlement or area. Designation would need to be consistent with Local Plan policy within the area, together with the NPPF criteria for existing open space (paragraph 97); i.e. where the green space, existing open space, sports and recreational buildings and land should not be built on unless:
 - a) *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
 - b) *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
 - c) *the development is for alternative sports or recreation al provision, the benefits of which clearly outweigh the loss of the current or former use.*

1.3 This Background Paper will explain the application of NPPF paragraphs 96 - 97 criteria in a local context.

2.0 Policy framework

2.1 The draft Local Plan Part 2 (November 2018), section 5 (Natural Capital): addressed open space as a valuable resource, consisting of public open spaces, sports pitches and recreation grounds, linking natural capital and people. The Plan policy for the enhancement and provision of open space (EN10 in the 1st draft Plan) will aim to ensure that people can access and benefit from the Green Infrastructure (GI) within new developments, linear corridors or country parks.

2.2 The Joint Core Strategy includes generic policy for the protection, retention and/ or enhancement of public open space, allotments, sports and recreation buildings and playing fields. In Policy 7(d) these open spaces are identified as key community facilities.

2.3 The Council appointed Knight Kavanagh and Page (KKP) to carry out an Open Space Study and a Playing Pitch Strategy¹. This was completed in 2017, replacing the previous (2006) Open Space, Sports and Recreational Study. Based on evidence gathered in 2015/ 2016, the KKP study provides evidence, that in turn may be used to inform locally based policies and standards for each open space typology, to ensure that open space requirements will be implemented for all new development, either by enhancing existing poor quality open space or by providing new open space to meet the additional need.

2.4 The 1st draft Local Plan Part 2 (November 2018) considered a range of recommendations arising from the KKP study, to set draft standards and policies. These will replace the adopted policies of the Rural North Oundle and Thrapston Plan (RNOT): Policy 15 and the recommendations in the Open Space SPD (2011) – due to be updated during 2021, after submission of the Plan to the Secretary of State.

2.5 The KKP Open Space Study and Playing Pitch Strategy (2017) superseded the 2006 PMP Study, which informed Policy 15 of the RNOT plan.

Policy 15 – OPEN SPACE, SPORT AND RECREATIONAL FACILITIES

On all new housing developments of 15 or more dwellings or 0.42 ha or larger⁴⁸, new open space, sport and recreation facilities shall be provided and/ or improvements and enhancements undertaken to existing off-site facilities. To achieve protection and enhancement of existing open space, sport and recreation facilities, measures will be taken to:

¹ https://www.east-northamptonshire.gov.uk/downloads/download/4484/open_space_and_playing_pitch_strategy

- a) **Protect and enhance the sites identified as having high value (in terms of quality and accessibility).**
- b) **Enhance the quality and accessibility of sites currently assessed to be below the local quality and accessibility standards as set out in Table 1.**
- c) **Consider the exchange of one site for another in order to substitute for any loss of open space or sports and recreational facility or to remedy deficiency in accordance with PPG17.**
- d) **Achieve sufficient open space and recreation provision; the recommended local accessibility standard for each open space type will be applied as set out in Table 1 above.**
- e) **Secure provision through planning obligations, from developers to improve open space, sport and recreation facilities and direct developer contributions towards areas of key deficiency**

2.6 The updated, stronger wording to the related policies will be set out in the Local Plan Part 2. Policies for the enhancement and provision of open space, sport and recreational facilities (policies EN10 and EN11 in the 1st draft Plan) will replace earlier policies, in line with the KKP study. In turn these policies will update/ replace equivalent existing Local Plan policies; 2011 RNOTP Policy 15 and policies RL3 and RL4 in the 1996 District Local Plan.

3.0 KKP – recommended standards for the protection and enhancement of open space, sport and recreation

3.1 The following standards are proposed in the KKP Open Space Standards Paper for each open space typology. No standard is set for cemeteries or civic spaces due to their unique nature and usage. These standards were proposed in the 1st draft Local Plan Part 2 and, when the Plan is adopted, will be applied to all new development in the Plan area. The accessibility standards in Table 1 (below; initially shown as Table 7 in the 1st draft Local Plan Part 2) apply to the whole of the district.

Table 1: Open Space Accessibility Standards	
Typology	Accessibility
Parks and gardens	1200 metres (15 minute walk time)
Natural and semi-natural	1200 metres (15 minute walk time)
Amenity greenspace	400 metres (5 minute walk time)
Children and younger people	800 metres (10 minute walk time)
Allotments	1200 metres (15 minute walk time)

3.2 The Planning Practice Guidance (PPG) – Open space, sports and recreation

facilities² – sets an overarching definition for open space. This explains that: *“Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks”* (paragraph 001).

- 3.3 The national definition for open space therefore incorporates all open space of public value. It includes not just land, but also riparian features such as rivers, canals, lakes and reservoirs (often referred to as “blue infrastructure”), all of which offer important opportunities for sport and recreation and can also act as a visual amenity (Planning Practice Guidance, 2014; replaced PPG17: Annex: Definitions, July 2002).
- 3.4 The PPG (paragraph 001) highlights the quality of life (health and recreation) benefits of open space. Open space in towns, villages and other developments is essential for improving public health and well-being. Attractive, safe and accessible parks, both green and other spaces contribute positive social, economic and environmental benefits and promote social inclusion. Well used and maintained open spaces make a considerable contribution to the quality of life of residents and visitors and promote sustainable communities.
- 3.5 The PPG (paragraph 001) also highlights the close functional relationship between open space and [green infrastructure](#) (see National Planning Policy Framework [paragraph 171](#)). The latter, as well as being an important part of the landscape and setting of built development, is an important component in the achievement of sustainable development (see National Planning Policy Framework [paragraphs 7-9](#)).
- 3.6 This study and report by KKP enabled the development of draft Policy EN10: Enhancement and provision of open space – as required for developments of 10 dwellings or more, or sites of more than 0.3ha. This policy will ensure that the provision for public open space is met where there is insufficient access to open space locally, to meet the needs of the rising population. This provision would include enhanced connectivity between open spaces and the Green Infrastructure network. Developer contributions will secure this provision on or off-site, as well as the long term management and maintenance of the new open space.

² <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>

Table 2: Level of provision required to support new development							
Typology	Higham Ferrers	Irthling-borough	Oundle	Raunds³	Rushden	Thrapston	Rural
	(ha per 1000 population/ 417 households⁴)						
Parks and gardens	0.25	0.01	0.31	0.58*	1.12	0.15	1.85
Natural and semi-natural	1.28	14.98	1.63	2.87	1.38	1.04	9.33
Amenity greenspace	0.39	1.16	0.36	0.56	0.58	0.64	0.94
Children and younger people	0.05	0.03	0.09	0.03	0.04 ⁵	0.09	0.14
Allotments	0.09	0.38	0.12	0.16	0.38	0.34	0.79

3.7 The Local Plan Part 2 will aim to ensure that opportunities for people to be physically active are maximised through encouraging active lifestyles; beyond a focus upon protecting traditional sports based facilities such as playing pitches, for competitive sports. This can include green gyms, marked/ measured trails and activities trails, as reflected in the Northamptonshire Physical Activity and Sport Framework (NPASF) 2018-2031⁶.

3.8 Large scale housing developments create additional need for sport and recreation facilities, therefore major developments will be required to provide developer contributions towards the provision and enhancement of playing pitches or make provision for these on site.

3.9 In Section 5.0 Natural Capital, the relevant policy in the Plan (Policy EN11 in the 1st draft Local Plan Part 2) will aim to ensure the enhancement and provision of sport and recreation facilities. This will be achieved in accordance with the accessibility standards set out in Table 1, above.

3.10 The standards proposed by the KKP study informed policies EN10 and EN11 of the 1st draft Local Plan Part 2 (November 2018). The updated policies in the Pre-Submission Draft version of the Plan (2021) will also take into account guidance provided by the NPASF. These policies, together with policies 7 and 10 of the Joint Core Strategy will form the framework by which development contributions for open space provision will be sought.

4.0 Setting further detailed policy direction regarding open space provision

4.1 The Council's most recent adopted statement of policy regarding open space contributions is the 2011 Open Space Supplementary Planning Document

³ Raunds was identified as having no existing parks and gardens provision therefore the wider East Northamptonshire figure has been used.

⁴ Applying 2.4 persons per household standard

⁵ The figure of 0.04 ha per 1000 population is a minimum. For the Rushden East SUE, the amount of provision will be dealt with via the Masterplan Framework Document.

⁶ https://www.northamptonshiresport.org/uploads/69_5a7c7e037f0fb927823411.pdf

(SPD)⁷. This supplements Policy 7 of the Joint Core Strategy, Policy 15 of the 2011 Rural North, Oundle and Thrapston Plan (RNOTP) and policies RL3 and RL4 of the 1996 District Local Plan (DLP). It provides additional detail about the quantitative basis upon which open space development contributions may be sought. The 2011 Open Space SPD will be reviewed and updated during 2021, in line with the latest policies and evidence (Planning Policy Committee, 10th December 2020, Item 5⁸).

- 4.2 RNOTP Policy 15 and DLP policies RL3 and RL4 will be replaced by policies for the enhancement and provision of open space, sport and recreational facilities the new Local Plan Part 2 (policies EN10 and EN11 of the 1st draft version of the Plan; anticipated to utilise the same numbering sequence in the published Pre-Submission Draft Plan), upon adoption of the latter. The standards in the Open Space SPD are based upon evidence derived from the 2006 Open Space, Sports and Recreation Study. This previous evidence differs from the latest evidence, as published in the KKP study.

5.0 Green Infrastructure (GI) evidence base

- 5.1 Progress in delivering enhancements, together with future projects to the GI network over the Plan period (to 2031), were assessed in the North Northamptonshire Green Infrastructure Delivery Plan (May 2014⁹). This is supported by bespoke GI assessments; including: “A spatial analysis of green infrastructure resources in East Northamptonshire” (August 2018¹⁰). The 2018 exercise has been conducted to identify where in East Northamptonshire priority local GI corridors might best be considered.

- 5.2 A county GI network was first described in 2006 through work undertaken for the River Nene Regional Park (RNRP). The network consists of sub-regional and local GI corridors. Sub-regional corridors broadly follow the main rivers, connect Northamptonshire’s larger settlements and extend into adjacent counties. Local corridors are smaller in scale and connect smaller communities to larger ones and to each other. The network was based primarily on waterways, concentrations of biodiversity and known movement patterns. It was also informed by studies of landscape and historic environment character. The focus on biodiversity and access was reflected in Natural England’s 2009 GI guidance, which outlined a GI typology that included:

- Parks and gardens
- Amenity greenspace
- Natural and semi-natural urban greenspaces
- Green corridors

⁷ https://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=920&fileID=5127

⁸ https://www.east-northamptonshire.gov.uk/meetings/meeting/1110/planning_policy_committee

⁹ http://www.nnjpd.org.uk/site/assets/files/1227/7_appendix_1_full_gidp_june_2014.pdf

¹⁰ <https://drive.google.com/file/d/1mTka4myUJrwFn5AQkx38NHlhbHOsrcSR/view>

- Other (allotments, community gardens, city farms, cemeteries and churchyards)
- 5.3 Open spaces such as amenity green spaces, parks and gardens, country parks or footpaths may also form green corridors and are important for the delivery of green infrastructure. By investing in GI as set out in draft policies EN7: “Green Infrastructure corridors” and EN8: “The Greenway”, developer contributions will be sought to towards the protection and enhancement of GI corridors within the district to provide a network of open spaces to serve the community.
- 5.4 In 2014, Natural England produced a nationwide profile of National Character Areas (NCAs)¹¹. These NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help deliver the maximum benefits for the natural environment. Biodiversity Action Plan (BAP) Habitats and Species data is also a relevant consideration. This is available elsewhere via organisations such as Natural England and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire and so is not identified on the Policies Map. The District of East Northamptonshire is covered by the following NCAs:
- 88 – *Bedfordshire and Cambridgeshire Claylands* – eastern periphery of the District; e.g. Ashton, Clopton, Hemington, Luddington, Luton, Thurning;
 - 89 – *Northamptonshire Vales* – Nene Valley;
 - 91 – *Yardley Whittlewood Ridge* – south eastern periphery of the District; e.g. Chelston Rise (Chelveston), Hargrave, Newton Bromswold, Avenue Road/ Newton Road area of Rushden;
 - 92 – Rockingham Forest – Majority of the rural parts of the District, north of the A14.
- 5.5 Described in the NPPF as “a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”, Green Infrastructure provision is an integral aspect of the Joint Core Strategy. This will similarly be reflected in the Local Plan Part 2.
- 5.6 Policies 19-21 of the Joint Core Strategy explain how GI should be delivered at the strategic level. These policies relate to the GI network across North Northamptonshire and East Northamptonshire in particular: Sub-regional GI corridors; e.g. Willow Brook, and Harper’s Brook (JCS Figure 17/ Policy 19(b)). Whilst specific GI routes are identified within the Joint Core Strategy (Figure 17), it is recognised that there is scope to identify local site specific proposals or linear connections in this Plan.

¹¹ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

- 5.7 The 2018 spatial analysis of the GI resources assessed the distribution of local GI corridors and assets within the district. As a result of this study, a local network of existing and planned GI assets is proposed, to accord with the JCS and current Planning Practice Guidance. This study identifies priority local GI corridors (i.e. those which offer the greatest net benefit in terms of ecosystem services). It is important that this Plan ensures that the range of GI benefits, including biodiversity conservation, water and flood management, and health and wellbeing and that the wider GI network provided, continues to be delivered and enhanced.
- 5.8 Made and emerging Neighbourhood Plans across the district have provided a number of projects related to the regeneration and strengthening of local GI networks. These will also inform local priorities for GI delivery.
- 5.9 Where appropriate, in terms of the scale of the development and its proximity to the GI network, developer contributions will be sought towards the protection and enhancement of the GI corridors within the district, including the Greenway. As this requirement may affect the viability of smaller developments, a threshold will be established to enable developer contributions towards the local GI and Greenway. A threshold of 10 or more dwellings; 0.3 ha or more for housing schemes, or more than 1000m² for commercial schemes, will be established to enable developer contributions towards the local GI and Greenway.
- 5.10 In addition to the provision and enhancement of GI, the NPPF (paragraph 175) recognises the importance of ancient woodlands and veteran trees as a key element of maintaining the natural capital of the district. The GI policy in the Local Plan (Policy EN7 in the 1st draft version of the Plan, November 2018) will acknowledge this aim.

Identifying Priority Green Infrastructure connections

- 5.11 The Joint Core Strategy (Figure 17/ Policy 19) proposes a hierarchy of GI corridors; sub-regional corridors such as the Nene and Ise Valleys; Harper's Brook and Willow Brook, connected by a series of local corridors. A large number of the designated local corridors are situated within the District and at the time of drafting the 1st draft version of the Plan (summer/ autumn 2018) it was decided that additional evidence base work should be undertaken to identify which of the local GI corridors identified in the Joint Core Strategy (Figure 17) are a priority for protection and enhancement.
- 5.12 The County Council's 2018 spatial analysis of green infrastructure resources in East Northamptonshire informed 1st draft Local Plan Part 2; identifying three additional corridors, over and above those defined at Figure 1 of the Joint Core Strategy:
- Duddington – Gretton (via Wakerley Woods);
 - Brigstock – Fotheringhay (via Glapthorn Cow Pasture and Lower Benefield); and
 - Aldwincle – Twywell (via Drayton House).

- 5.13 These three additional corridors were combined with four existing corridor designations which provide substantive opportunities for maximising GI connectivity. Accordingly, a total of seven priority GI corridors were specified in the draft Policy EN7. A further potential corridor, the Oundle circular cycle/ pedestrian network, was proposed by the 2015 Oundle Cycle Network Study¹². These should be delivered alongside specified GI routes already identified within the Joint Core Strategy Fig. 17: Policy 19(b).
- 5.14 The 2018 spatial analysis of GI resources in East Northamptonshire reviewed the distribution of local GI corridors and assets within the district. This analysis found that the areas of multi-functionality are predominantly located to the west of the river Nene (mainly within Rockingham Forest), with fewer opportunities located east of the river. As most of the GI networks have been established to the south of the district, it was identified that more attention is now required to deliver an improved GI network to the north of the district. The study identifies priority local GI corridors that offer the greatest net benefit in terms of ecosystem] services. The report further recognised the importance that the Plan ensures a range of GI benefits: biodiversity conservation, water and flood management and health and wellbeing.
- 5.15 Policy EN7 should ensure that the GI corridors across the district are protected and enhanced.to provide additional direction, supporting delivery of GI as stipulated in JCS Policy 9. The priority GI corridors also provide localised opportunities to deliver enhanced connectivity to the Greenway network as it is expanded to the north of Thrapston. Policy EN8 is project specific, allowing for the future expansion of the Greenway network. This should also provide opportunities for natural capital enhancement, within the Nene Valley and Rockingham Forest.

6.0 Reviewing feedback from the 1st draft Local Plan Part 2 consultation (November 2018 – February 2019) regarding green infrastructure/ open space

- 6.1 Feedback (representations) from the 1st draft Local Plan Consultation (November 2018 – February 2019) was considered in terms of 3 categories:
- No further changes required;
 - Proposed changes to text and/or policies; or
 - Additional evidence required to determine whether amendments are required to address the representation.
- 6.2 A significant number of representations regarding open space and/ or green infrastructure (section 5.0: Natural Capital) were received during the 1st draft LPP2 consultation. The matters raised through these representations,

¹² <https://www.oundle.gov.uk/uploads/oundle-cycle-network-study---sustrans---draft-2.pdf>

https://www.east-northamptonshire.gov.uk/meetings/meeting/944/planning_policy_committee

together with the Council's response, were agreed by the Planning Policy Committee on 11th March 2019 (Item 5¹³).

- 6.3 This Background Paper considers the implications of representations regarding the Protection and enhancement of open space, sport and recreation (policies EN10 and EN11) and green infrastructure (policies EN7 and EN8) for the submission Local Plan Part 2. Feedback relating to Policy EN9, regarding the designation of Local Green Space, is the subject of a separate Background Paper. More detailed information/ feedback arising through the consultation regarding best practice for delivery and management of open space/ green infrastructure and how the Council is looking to address this, is set out in the Annex to this Background Paper.

Protection and enhancement of open space, sport and recreation (1st draft Plan policies EN10 and EN11)

- 6.4 Representations regarding 1st draft Plan policies EN10 and EN11 identified the following issues:

- Application of the 'Fields in Trust Standards' standards in draft Policy EN10, argued to be poorly defined and excessive, with particular reference to the Rushden East Sustainable Urban Extension;
- Importance of improving the accessibility of existing greenspace and ensuring good links between new and existing greenspace and easy access to the wider green infrastructure including to the green infrastructure corridors in the Joint Core Strategy Figure 17;
- Scope of Policy EN11 considered insufficiently clearly defined, and should acknowledge multifunctional role of open spaces; e.g. alternatives such as green gyms, marked / measured trails, activity trails could readily be incorporated / added into spaces used for formal playing pitches, to support wider physical activity by the community at large;
- Arrangements for long term management and maintenance of all new playing pitches; e.g. how development contributions would be secured and effectively used to deliver enhanced accessibility, applying quantity standards for the scale of development proposed;

- 6.5 In response to representations regarding policies EN10 and EN11, a number of changes to these draft policies are proposed to be incorporated into the published (Pre-Submission Draft) version of the Local Plan Part 2:

- Through engagement on the development on the MFD, it is proposed to amend Policy EN10/ Table 8 to clarify this position, to ensure the Plan is consistent with advice being provided to those planning major developments, such as Rushden East;
- "*Footnote: Strategic development sites are defined in the Joint Core Strategy as developments of 500 or more dwellings/ 5ha or more of employment uses*", to clarify the scope of Policy EN11;

¹³ https://www.east-northamptonshire.gov.uk/meetings/meeting/944/planning_policy_committee

- Clarification to explain that for relevant qualifying development, contributions to enhance the quality and value of existing playing pitches within the locality will be required, where these comply with the relevant legislation.

Green infrastructure/ The Greenway (1st draft Plan policies EN7 and EN8)

6.6 Draft policies EN7 and EN8 in the 1st draft Plan, respectively put forward priority green infrastructure corridors and future phases of The Greenway (predominantly to the north of Thrapston). Representations regarding these draft policies identified the following issues:

- Additional protection for ancient/ veteran trees (ENC Development Management); this should be recognised in the Plan;
- Designation of green infrastructure assets through the Local Plan/ Policies Map;
- It is necessary to explain how development or contributions could achieve delivery of the Greenway and how Community Infrastructure Levy (CIL) Regulations should be applied to the delivery of The Greenway.

6.7 The Greenway, as identified on the Policies Map, is a priority project for investment and improvement, and there will be a focus on completing the Greenway within the district. Development should be designed to protect and enhance the Greenway, and strengthen the connections to the wider GI network. This will be achieved via development or through mechanisms such as developer contributions (where these comply with the relevant legislation) and additional funding streams where possible.

6.8 An associated representation informs the text to recognise that enhancements to the Greenway could be delivered via new development and not just by developer contributions. The made Neighbourhood Plans for Barrowden and Wakerley, Chelveston cum Caldecott, Higham Ferrers, Raunds and Warmington, plus the emerging Neighbourhood Plan for Ringstead, all include specific proposals for possible extensions and links to the Greenway.

6.9 Alongside Neighbourhood Plans, with site specific GI policies and proposals, the Local Plan will need to acknowledge strategic projects; i.e. at a District level. It will signpost other information/ direction regarding GI; e.g. Natural England's National Character Areas (NCAs).

7.0 Conclusion/ recommendations

Translating Open Space standards into policy

7.1 Open spaces, to include: amenity green spaces, parks and gardens, country parks or footpaths can form green corridors and are important for the delivery of green infrastructure.

- 7.2 By investing in GI as set out in Green Infrastructure corridors and Greenway policies (EN7 and EN8 in the 1st draft version of the Plan), developer contributions will be sought to towards the protection and enhancement of GI corridors within the district to provide a network of open spaces to serve the community.
- 7.3 Consultation feedback has entailed updates to policies EN7, EN8, EN10 and EN11 to address matters that arose through the 1st draft Plan consultation. These detailed textual changes will be reported to the Planning Policy Committee, for inclusion within the Local Plan Part 2 (27 January 2021). Changes to policy and supporting text wordings are set out in the “Schedule of Changes”, which will accompany the Committee report.

Prepared by:
Anne Dicks (Planning Policy Officer)

Annex – Feedback/ best practice

- A.1 Representations and feedback received during the 1st draft Local Plan Part 2 consultation put forward a range of suggestions regarding best practice for both the delivery and management of open space and green infrastructure. This Annex provides additional detail as to how the Council may consider addressing the issues raised; either through amendments to the relevant Local Plan policies (draft policies EN7, EN8, EN10 and EN11) or other such mechanisms.

Climate change/ flood management

- A.2 The wider context for open space and green infrastructure was noted through the 1st draft Plan consultation. Notably, it was highlighted that allocated sites should accord with Policy 5 of the JCS: Water Environment, Resource and Flood Risk Management (and should comply with Policy 10 of the adopted JCS with regard to water quality and water resources). Any sites in the functional floodplain will be contrary to criteria specified in Policy 5a. It was emphasised that the proposed allocations in the Plan should be underpinned by an up to date SFRA. Evidence that the flood risk sequential test has been applied should be included in the Plan.
- A.3 Section 3.7 of the draft Plan states that this Plan will recognise the 10 overarching outcomes of the Core Strategy, setting out how these can be delivered within the district. Local Plan outcome 2 is adaptability to future climate change. However, its description contains no reference to how this would be delivered within an environmental context. Climate change mitigation may be achieved requiring new development to incorporate green roofs and walls to take advantage of under utilised urban spaces and provide multi-functional benefits through flood management, biodiversity, climate change mitigation and by managing the heat island effect. In addition, the plan could also include a policy for the protection of soils, and note that this remains absent from the Plan.

This comment is targeted at para. 3.7: Local Plan Outcomes and the concerns raised are addressed in the JCS. This comment would be better directed at the review of the JCS, anticipated to commence during 2021.

Designation of green infrastructure assets

- A.4 Natural England has highlighted, with regard to Open space, Green space, Green Infrastructure and BAP Habitats and Species, that these assets/ proposals have not been protected and identified on the proposals map and would be a useful opportunities and constraints exercise, to ensure that the relevant policies are best informed.

- A.5 The draft plan still does not identify National Character Areas (NCAs). These highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects, so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. Reference should be made to the NCAs. Nearly all of the geographical area of East Northamptonshire falls within: NCA Profile: 89 Northamptonshire Vales and NCA Profile: 92 Rockingham Forest.

Proposed addition of information; explaining that nearly all of the District falls within National Character Areas (NCAs) 89 (Northamptonshire Vales) and 92 (Rockingham Forest). The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help deliver the maximum benefits for the natural environment. Biodiversity Action Plan (BAP) Habitats and Species data is also a relevant consideration. This is available elsewhere via organisations such as Natural England and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire.

Policy EN7 – Green infrastructure

- A.6 A range of amendments to Policy EN7 were highlighted, to optimise opportunities for delivering net green infrastructure enhancements. These reflect the need to ensure that policy criteria provide a suitable framework, with reference to the following criteria:
- a) ensuring new development, including new open space, is connected to the existing Green infrastructure network; and
 - b) delivery of ecosystem services through measures such as green roofs and wall, the protection of soils plus new tree planting, including planting of new street trees using native species;
 - c) using developer contributions, and additional funding streams where possible, to facilitate appropriate additions to the Green Infrastructure network or to improve the quality of the existing Green Infrastructure network including ancient woodlands and veteran trees; and
 - d) off-site contributions, where these are needed to provide connections to the defined Green Infrastructure corridors, and where these planning obligations fulfil the necessary legislative requirements based on a demonstrable need depending on the aspirations of the local community and level of existing provision

Policy EN8 – The Greenway

- A.7 It was suggested that Policy EN8 wording could be improved by recognising that enhancements to the Greenway could be delivered via new development, not just via developer contributions. Sites such as Rushden East, which will

deliver significant new green links are enhancing the Greenway through on-site provision which needs to be recognised in negotiation of any developer contributions to avoid 'double dipping'; i.e. ensuring that development contributions are secured through the correct legal mechanisms.

Additional/ revised Policy EN8 text addition proposed, explaining that The Greenway, as identified on the Policies Map, is a priority project for investment and improvement, and there will be a focus on completing the Greenway within the district. Development should be designed to protect and enhance the Greenway, and strengthen the connections to the wider GI network. This will be achieved via development or through mechanisms such as developer contributions (where these comply with the relevant legislation) and additional funding streams where possible.

Policies EN10/ EN11 – Protection and enhancement of open space, sport and recreation

- A.8 Policies EN10 and EN11 respectively focus upon the delivery of open space, and sport/ recreational facilities, through the planning system. The application of Policy EN10 has particular implications for open space provision to service strategic developments/ sustainable urban extensions such as Rushden East.
- A.9 The draft Rushden East Masterplan Framework Document (MFD) has been worked up on the basis of accessibility standards, using 'Fields in Trust' distances and the existing Local Plan space requirements, which equates to around 0.6 hectares across the site. This is felt to be a balanced approach.
- A.10 In terms of additional clarification, the supporting text/ tables to policies EN10 and EN11 could be clarified; such that an average household occupancy of 2.4 is to be assumed in calculating the size of new populations to be planned for. This figure has been used previously and there is no reason to change it. If a higher occupancy is to be assumed this would have an impact on development, including that being planned at Rushden East. Additionally, it is important to note that if the proposed standards were to increase for any reason prior to the Draft Plan being finalised, this could have a detrimental impact on the capacity of the SUE and its deliverability.
- A.11 Alternatives sports and recreational infrastructure such as green gyms, marked / measured trails, activity trails could readily be incorporated / added into spaces used for formal playing pitches. In this way a much wider section of the community is likely to be supported to be physically active and thus greater health and wellbeing benefits are likely to be achieved.

- A.12 Development creates additional need for sport and recreation facilities, therefore major development will be required to provide developer contributions towards the provision and enhancement of playing pitches' – this is suggestive of off-site contribution in lieu of on-site provision, also provides no definition of 'large-scale housing development.' Overall, more clarity is provided in the policy and supporting text to ensure it can be used effectively by applicants in bringing forwards development.

Additional policy text is considered, in order to distinguish between Rushden East (the principal SUE) and requirements for other development. New residential developments of 10 or more dwellings (or sites more than 0.3 ha) will be required to contribute to the enhancement and provision of open space to meet the needs of the population arising from the development. The provision of new open space will be required for development where there is insufficient access to existing open space within the local area. Where applicable, New open space will need to be provided in order to meet the accessibility, quality and value standards set out in section 5.0.

Rushden East SUE will have its own bespoke open space, sport and recreation facilities which will be agreed via the MFD.

For all other qualifying development, contributions to enhance the quality and value of existing open space, including enhanced connectivity between open spaces and the Green Infrastructure network within the locality, will be required where these comply with the relevant legislation. These should also allow scope for securing a wider range of recreational facilities for those taking part in exercise, rather than focussing primarily on creating and protecting traditional sports based facilities such as playing pitches. Developer contributions will be calculated based on the quantity standards for the scale of development proposed. The long term management and maintenance of all new open space must be secured.