



East  
Northamptonshire  
Council

Local Plan Part 2

**Statement of Consultation under Regulation**

**22**

**East Northamptonshire Local Plan**

**Submitted 29 March 2021**

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## Additional Comments to note

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# Section 1: Introduction

## 1.0 Purpose

- 1.1 The East Northamptonshire Local Plan Part 2 (LPP2) is being prepared to guide future planning decisions in the District. In combination with the North Northamptonshire Joint Core Strategy (JCS) 2011-2031, adopted July 2016 (Local Plan Part 1) it will form the 'Local Plan' for the District of East Northamptonshire in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) dated 30 September 2019. The preparation process for the LPP2 has incorporated a number of consultation stages. The Town and County Planning (Local Planning) (England) Regulations 2012 ("the Local Plan Regulations") require the Local Planning Authority to include amongst its proposed submission documents:
- 1.3 The SCI<sup>1</sup> document sets out how the Council will consult and involve the public and statutory consultees in planning matters.

## 2.0 Background

- 2.1 This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan Part 2, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations.
- 2.2 The Council began preparing the Local Plan Part 2 in January 2017. This new Local Plan will supplement the strategic vision, objectives and spatial strategy set by the JCS, setting additional development plan policies which will guide future development within East Northamptonshire. The Plan will look ahead to 2031 and identify the main areas for sustainable development growth. It establishes policies and guidance to ensure sustainable development is delivered in accordance with the principles set out in the National Planning Policy Framework (NPPF).
- 2.3 The Local Plan Part 2 will provide additional District-level detail to supplement the policies in the adopted JCS (Local Plan Part 1) and provide additional spatial direction to support the preparation of Neighbourhood Plans. It will replace all remaining retained/saved policies from the current Local Plan Part 2, which consists of:
  - Rural North, Oundle and Thrapston Plan (RNOTP), adopted July 2011; and
  - East Northamptonshire District Local Plan, adopted November 1996.
- 2.4 The Council's Proposed Submission Local Plan Part 2 and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 for a six week consultation period lasting from **5<sup>th</sup> February – 19<sup>th</sup> March 2021** (inclusive). The Council consulted specific consultation and statutory bodies, local

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<sup>1</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/5](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/5)

amenity and residents' groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement (December 2013; updated September 2019).

### **Statutory requirements for consultation and engagement**

- 2.5 The Local Plan Regulations require the Council to prepare and submit, with the Local Plan, a statement setting out:
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18
  - (ii) how those bodies and persons were invited to make representations under regulation 18
  - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18
  - (iv) how any representations made at the regulation 18 consultation stage have been taken into account in preparing the LPP2 (Regulation 22(1)(c)).
- 2.6 The Planning Practice Guidance explains that there is considerable flexibility open to local planning authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in Regulation 18 of the Local Plan Regulations on consultation, and with the commitments in the Statement of Community Involvement (SCI).
- 2.7 This statement sets out the consultation that has been undertaken in the development of the LPP2, and how the issues identified have informed the development of the submission version Plan. It should be read alongside the Statement of Consultation (and addendums) for the JCS setting out the issues considered in the Local Plan Part 1, and evidence base and other background documents which have also informed the LPP2 and are available on <https://www.east-northamptonshire.gov.uk/planningpolicy>.
- 2.8 This statement is supported by appendices detailing how consultation was undertaken, the responses received at the statutory (Regulation 18 and 19) stages and provides further detail as to how the comments have been taken into account by the Council.
- 2.9 **Appendix 1** explains:
- who was invited to make representations and how (Regulation 22 (1)(c)(i) and (ii))
  - a summary of the main issues raised by those persons (Regulation 22 (1)(c)(iii)) in Plan order and
  - how those issues have been addressed in the preparation of the Local Plan (Regulation 22 (1)(c)(iv)).
- 2.10 **Appendix 2** explains:
- how the Regulation 19 Local Plan consultation was undertaken and the number of representations made including a summary of the main issues (Regulation 22 (1)(c)(v), which will be packaged up and submitted to the Secretary of State alongside the submission Plan and supporting documents.

## **Statement of Community Involvement**

- 2.11 The council has undertaken consultation and engagement in accordance with the Council's Statement of Community Involvement (SCI), and the current SCI was adopted by the North Northamptonshire Joint Planning Committee (NNJPC) on 25 July 2019 and East Northamptonshire Council (Planning Policy Committee) on 30 September 2019. The SCI outlines when, how and whom should be consulted at each stage of the plan's production.
- 2.12 A number of key changes to the SCI from its previous (2013) version were made including:
- Policies for giving advice or assistance to neighbourhood planning groups in relation to the preparation on neighbourhood plans.
  - Policies for involving communities and other interested parties in the preliminary stages of plan making, specifically in their functions under sections 13 (survey) and 15 (Local Development Scheme) of the Planning and Compulsory Purchase Act 2004.
  - Consideration of bank holidays in relation to consultation period lengths.
  - The need to produce a Statement of Common Ground as part of the Duty to Cooperate.
  - Managing personal data in accordance with 2018 data protection legislation.
- 2.13 A Planning Policy consultation database has been set up, in accordance with the requirements of the 2012 Regulations. The main typologies of consultee are set out at Appendix 1. The database has been managed and progressively updated and added to as the LPP2 has progressed.

## **Data Protection Act**

- 2.14 The 2018 Data Protection Act comprehensively updated legislations with regards to the handing and treatment of personal data. This, and associated secondary legislation (Data Protection Regulations 2018), have implications for public consultations for both planning applications and the development plan. Future consultations and the management of consultee databases must be undertaken in accordance with the requirements of this legislation.
- 2.15 Contributors who have provided comments in response to a plan consultation will normally be added to the relevant consultation database, unless they have requested not to be included. From time to time the local authorities will review their databases and contact individuals by email or post to find out if they would like to remain on the database.

## **Implications of Covid-19 national pandemic (since March 2020)**

- 2.16 For the latter stages of plan preparation (since March 2020) the consultation procedure was adapted in response to the Covid 19 national pandemic, in line with government regulations.
- 2.17 Customers of the council have continued to be contacted and informed of progress of the Plan via the Webpage, Twitter and Facebook. In the interests of equal access, if it was necessary for a customer to see a paper copy of the Plan, under pandemic regulations, an appointment could be arranged for viewing at the Thrapston Office. Officers were able

to arrange this for a convenient date and time as well as provide guidance on the safety procedures for visiting the office, before greeting the customer to offer assistance.

- 2.18 With public health at the forefront of the changes to service provision, this interim process is designed to ensure maximum safety of both the public and frontline staff at ENC. Customers were asked to adhere to safety measures in line with Government guidance; e.g. by wearing a mask when visiting any East Northamptonshire Council location.
- 2.19 Dependent on the current restrictions, libraries within the District have been operating on minimal hours for some days of the week or have remained closed and have therefore not been available for the display of hard copies of the Plan. To avoid the spread of Covid-19, the availability of printed matter on display has been limited or not possible since the first national lockdown (from March 2020).

### 3.0 Structure of Statement

- 3.1 This statement of consultation comprises four main sections, plus two appendices.

***Section 1 is the introductory section – It sets out the purpose and background to this document***

***Section 2 sets out the timeline which has been followed in preparing the Local Plan which is accordance with the up to date Local Development Scheme ([https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/10](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/10)).***

***Section 3 describes the Council's process and actions to ensure compliance with the requirements of the Duty to Cooperate.***

***Section 4 provides a summary of the process – It summarises the main issues raised during the course of the consultation carried out under Regulations 18/19 and how the comments received have been considered by the Council.***

**Appendices – detailing how consultation was undertaken, the responses received at the statutory Regulation 18 and 20 stages and includes how the comments have been taken into account by the Council:**

**Appendix 1 explains:**

- **who was invited to make representations and how (Regulation 22 (1)(c)(i) and (ii))**
- **a summary of the main issues raised by those persons (Regulation 22 (1)(c)(iii)) in Plan order and**
- **how those issues have been addressed in the preparation of the Local Plan (Regulation 22 (1)(c)(iv)).**

**Appendix 2 explains:**

- **how the Regulation 19 Local Plan consultation was undertaken and the number of representations made including a summary of the main issues (Regulation 22 (1)(c)(v) with a council response to the issues raised.**

# Section 2: Plan Production Timeline

## 4.0 Plan Production Timeline

- 4.1 The creation of a new Local Plan Part 2 requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required.
- 4.2 The key stages in preparing the Plan are as follows:
- Regulation 18 – Scoping, issues and call for sites
  - Stakeholder workshops
  - Consultation on Draft Plan (site specific proposals)
  - Regulation 19 – Consultation on Pre-Submission version LPP2
  - Submission to the Secretary of State for Communities, Housing and Local Government (representations from the Pre-Submission version LPP2 consultation)
- 4.3 Alongside these principal stages of consultation, additional engagement through ongoing stakeholder discussions, public meetings and the use of the council’s website were held as part of the evidence gathering process, to inform the development of the plan. The timetable below outlines all consultation stages for the emerging Local Plan<sup>2</sup>, up to the Submission date of the **29 March 2021**.

**Figure 1: Preparation of the Local Plan – key milestones**

**Previous stages:**

- 1. April 2016: Decision made to prepare new district-wide Local Plan Part 2**
- 2. January – March 2017: Formal commencement/ consultation on the scope of Plan/ call for sites, including issues/ options consultation (Regulation 18)**
- 3. May 2017 – April 2018: Stakeholder workshops**
- 4. May – October 2018: Preparation of 1<sup>st</sup> draft version Local Plan Part 2**
- 5. November 2018 – February 2019: Consultation on 1<sup>st</sup> draft version Local Plan Part 2**
- 6. February 2019 – January 2020: Agree Council responses to 1<sup>st</sup> draft version Local Plan Part 2 representations**
- 7. February – March 2020: Focused changes consultation – additional sites**
- 8. June 2020: Agree Council responses to focused changes consultation**
- 9. October – November 2020: Focused changes consultation – additional sites (alternatives)**
- 10. December 2020 – January 2021: Agree Council responses to 2<sup>nd</sup> focused changes consultation and Pre-Submission version Local Plan Part 2 for consultation and submission to the Secretary of State**

<sup>2</sup> The key consultation stages noted at paragraph 4.2 (above) are highlighted by underlining in Figure 1

**11. February – March 2021: Consultation on Pre-Submission version Local Plan Part 2 (Regulation 19)**

**Current stage:**

**12. March 2021: Submission of Local Plan Part 2 to Secretary of State for Examination (Regulation 22)**

**Estimated post-submission stages:**

**13. Spring/ summer 2021: Local Plan Part 2 Examination (Regulation 24)**

**14. Summer/ autumn 2021: Main modifications (Regulation 19) consultation**

**15. Autumn 2021: Receipt of Inspectors Report (Regulation 25)**

**16. Autumn/ winter 2021: Adoption of Plan (Regulation 26)**

- 4.4 The outcome of each consultation stage, both formal and informal, has been regularly reported to the Planning Policy Committee. A copy of the report, agendas and minutes of committee meetings can be found on the Council's Planning Policy Committee web page<sup>3</sup>. These reports set out how issues arising from the consultation have informed the development of the plan and are referenced in this report.

**April 2016: Decision made to prepare new district-wide Local Plan Part 2**

- 4.5 The resolution to produce a new Local Plan Part 2 was taken by Full Council on 11<sup>th</sup> April 2016. The Council subsequently reviewed existing policies and identified any current gaps in policies or evidence bases. During summer 2016, the Council began undertaking further research to inform the Plan.
- 4.6 On 25<sup>th</sup> July 2016, the Planning Policy Committee considered and agreed the scope of the District Wide Local Plan and the timetable for the Plan, therefore allowing for the formal launch of the Plan<sup>4</sup>. During autumn 2016 officers worked with the Head of Planning Services, in consultation with the Chairman and/or Vice Chairman of the Planning Policy Committee to prepare documentation for the formal launch of the Plan.

**January – March 2017: Formal commencement/ consultation on the scope of Plan/ call for sites, including issues/ options consultation (Regulation 18)**

- 4.7 The formal process of preparing the Plan commenced with the consultation on the scope of the Plan, in accordance with Regulation 18 (27<sup>th</sup> January – 13<sup>th</sup> March 2017). This

<sup>3</sup> [https://www.east-northamptonshire.gov.uk/meetings/committee/9/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/committee/9/planning_policy_committee)

<sup>4</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/694/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/694/planning_policy_committee)

consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012), with key consultees and stakeholders, consisted of:

- **Scoping of the Plan – the issues and options to be considered – Regulation 18 consultation document, including background information and consultation questions;**
- **Call for sites;**
- **Sustainability Appraisal scoping; and**
- **Habitat Regulations screening.**

4.8 Regulation 18 is the first formal statutory stage in the plan-making process. It requires that various bodies and stakeholders be notified that the council is preparing a plan and invites them to comment about what that plan ought to contain. **Further details regarding the Regulation 18 consultation, how this was undertaken and how it has informed the plan-making process is set out at Appendix 1.**

### **May 2017 – April 2018: Stakeholder workshops**

4.9 A series of workshop events were held with elected representatives – Members of East Northamptonshire Councils, and Town/ Parish Councils, to consider specific themes, topics and proposals that ought to be covered by the Local Plan Part 2.

4.10 These workshops closely followed the Regulation 18 consultation. These were held with elected Members and representatives of the Town and Parish Councils and were intended to further develop the initial concepts and ideas that were identified in the Regulation 18 consultation. Three main sets of workshops were held, as follows:

1. **May – October 2017** – Topic/ theme based Member workshops; reported to Planning Policy Committee, 27 November 2017 ([Item 8](#)).
2. **November 2017 – January 2018** – Area focused (town centre/ urban area and rural area) Member workshops; reported to Planning Policy Committee, 19 February 2018 ([Item 8](#)).
3. **February – April 2018** – Town and Parish Council Workshops; reported to Planning Policy Committee, 23 April 2018 ([Item 9](#)).

4.11 This non-statutory stage but was considered helpful to allow local representatives and other stakeholders to engage in the early part of the process and help to shape how the LPP2 will evolve.

### **Local Plan Reference Group**

4.12 In autumn 2017, a decision was taken to set up an informal Local Plan Reference Group, consisting of key Members (Chair and Vice-Chair of the Planning Policy Committee; Leader and Deputy Leader of the Council). This was intended to provide a bridge between officers and Members, to ensure political scrutiny for the process of translating feedback from the Local Plan workshops into workable policies.

4.13 The Reference Group meets periodically on an ad-hoc basis, as and when issues have arisen throughout the plan-preparation process. This has proven to be an effective forum; both for key Members to understand issues arising as the LPP2 was developed, and for officers to understand political implications of emerging Plan proposals.

## May – October 2018: Preparation of 1<sup>st</sup> draft version Local Plan Part 2

- 4.14 Following the conclusion of the series of stakeholder workshops, The scope for the LPP2 was given further consideration by the Planning Policy Committee on 4 June 2018 ([Item 7](#)). This identified that the Plan would need to contain policies covering the following:
- Spatial strategy, settlements and open countryside
  - Natural capital – environment, design and green infrastructure, social capital
  - Culture, health and wellbeing, historic environment
  - Economic prosperity
  - Housing
  - Community infrastructure
  - Monitoring and implementation
  - Site specific assessments of any allocations
- 4.15 The 2018 NPPF review reiterated the Government’s priority of seeking a significant increase in rates of housebuilding. In particular the 4 June 2018 Committee report, acknowledged that the LPP2 will need to identify housing site allocations that demonstrate that East Northamptonshire is planning positively for housing growth, and also to provide a reasonable buffer over and above the identified JCS housing targets for the district.
- 4.16 The 1<sup>st</sup> Draft LPP2 text was approved for consultation by the Planning Policy Committee in stages, as follows:
- [30 July 2018](#) – Detailed scope of LPP2 (Item 6), and Area Portrait; Vision and Outcomes, and Spatial Strategy sections (2.0, 3.0 and 4.0 respectively; Item 7) agreed;
  - [17 September 2018](#) – Natural Capital; Social Capital, and Town Strategies sections (5.0, 6.0 and 9.0 respectively; Item 5) agreed;
  - [22 October 2018](#) – Economic Prosperity; Housing Delivery and Monitoring and Implementation: sections (7.0, 8.0 and 10.0 respectively; Item 5) agreed;
  - Minor and outstanding amendments following the 22 October Committee were agreed by the Head of Planning Services in conjunction with the Chair/ Vice-Chair.

## November 2018 – February 2019: Consultation on 1<sup>st</sup> draft version Local Plan Part 2

- 4.17 The Council consulted on a full draft version of the Local Plan that combined the updated evidence base, technical assessments, previous consultation responses and internal comments. The 1<sup>st</sup> Draft Plan consultation was considered helpful to allow the public and other stakeholders to respond to the emerging draft proposals, in advance of the more procedural statutory Pre-submission draft LPP2 consultation. This was an open consultation where stakeholders were entitled to submit any comments regarding the document; i.e. where policies are supported, and / or any concerns or objections, or putting forward amendments to individual policies or the supporting text.
- 4.18 Consultation was open for a 6 week period; initially taking place from **2 November – 17 December 2018**, inclusive. The Council consulted on an initial draft version of the Local Plan that combined the latest evidence base, technical assessments and previous feedback from the Regulation 18 consultation and subsequent stakeholder workshops.

Consultation was initially open for a 6 week period (2<sup>nd</sup> November – 17<sup>th</sup> December 2018, inclusive), but subsequently extended by a further 9 weeks (2 calendar months) to 18<sup>th</sup> February 2019 in response to the late publication of certain evidence base documents.

- 4.19 Consultation was carried out in accordance with the then current Statement of Community Involvement (December 2013). The Draft Plan (site specific proposals) document was made available on the Council's website and for inspection at Customer Service Centres and libraries.
- 4.20 Consultation emails were sent to all those listed on the consultation database, including statutory consultees. The Council used Smart Survey software to manage the consultation. All consultees received an email notification and a link to the Smart Survey portal was provided on the Council's website; together with downloadable versions of all relevant documents. Consultees were able to comment in writing by post or email, or via our Smart Survey.

### **Consultation methods**

- 4.21 As part of the 1<sup>st</sup> draft Plan process, the most extensive and wide-ranging consultation of the Local Plan, the following consultation methods were also used to engage all stakeholders:

- The public were made aware of the consultation using a variety of media including the Council's website, an article in the Nene Valley News (the free East Northamptonshire District newspaper) and tweets from the council's Twitter account. Full details of the consultation are set out in the relevant web page<sup>5</sup>.
- Consultation with all relevant consultees on the Local Plan database via email. This included: Town/ Parish Councils; neighbouring authorities; national and local groups / organisations; agents / landowners; and individuals that had asked to be notified.
- Press release – the Council prepared a bespoke press release, which was available via the Council website and intranet pages (for internal staff), and sent to the local press<sup>6</sup>.
- Nene Valley News – A copy of the relevant Nene Valley News article (3 November 2018) may be viewed through the following link: <https://nenevalleynews.co.uk/e-version/>.
- Libraries and Customer Service Centres – Hard copies of the Draft Plan and supporting documents were made available for viewing in the Council's Customer Service Centres at Thrapston, Rushden and Oundle. Hard copies were also made available in the local libraries at Irthlingborough, Oundle, Raunds, Rushden and Thrapston.
- Twitter – The Council tweeted that the issues and options consultation had begun and provided a link to the website with further details. At the time of the

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<sup>5</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/6](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/6)

<sup>6</sup> [https://www.east-northamptonshire.gov.uk/news/article/948/have\\_your\\_say\\_on\\_the\\_draft\\_local\\_plan\\_part\\_2](https://www.east-northamptonshire.gov.uk/news/article/948/have_your_say_on_the_draft_local_plan_part_2)

consultation the Council had 4692 followers; although the Council has an open Twitter account so tweets could be viewed publicly without being a ‘follower’.

- Exhibitions and workshops – The Council held a number of exhibitions and workshop events during the consultation. Further details are set out below.
- Feedback consultation forms were printed, containing information about the consultation and how people could get involved. These were available through the exhibitions and a link to the Smart Survey was made available on the council’s website.

### ***Exhibitions and workshops***

4.22 During the 1<sup>st</sup> draft Plan consultation, several workshops and exhibitions were held (November/ December 2018). These were intended to inform the consultation, although these also provided opportunities for stakeholders to respond accordingly. Details are set out at **Figure 2** (below).

**Figure 2: details of exhibitions and workshop events held during the 1<sup>st</sup> draft Plan consultation**

<b>Date</b>	<b>Type of event</b>	<b>Invitees</b>	<b>Type (internal/ external)</b>	<b>No of attendees</b>	<b>Comments/ notes</b>
<b>28 November 2018</b>	Councillor briefing/ discussion	All ENC Members	Internal	10	Several queries re use/ application of policies
<b>4 December 2018</b>	Officer workshop	Development Management team	Internal	~10-15	Detailed discussions around enhancements to policies, to assist development management
<b>6 December 2018</b>	Exhibition – Fletton House, Glaphorn Road, Oundle (4-8pm)	Public/ District residents	External	66	Drop in/ Q&A session, to help members of the public/ interested parties respond to the consultation
<b>10 December 2018</b>	Exhibition – Rushden Hall (4-8pm)	Public/ District residents	External	8	Drop in/ Q&A session, to help members of the public/ interested parties respond to the consultation

4.23 The series of exhibition events, briefings and workshops provided a mechanism whereby the consultation could be tailored to meet the needs of different audiences. The two internal workshops / briefings focused upon the technical side of the Plan; i.e. how policies could be strengthened to support practitioners in decision making (Members and officers alike).

4.24 The two external events provided an opportunity for officers to meet members of the public (interested parties / stakeholders), in order to explain the context and implications

of the Local Plan Part 2. These exhibitions focused upon providing information, through answering questions, to enable stakeholders to be better informed when responding to the consultation.

### ***Extended consultation***

- 4.25 The 1<sup>st</sup> draft LPP2 consultation was initially set for a 6 week period (in line with the Regulations for statutory consultations), from 2 November – 17 December 2018, inclusive. During the consultation additional evidence base documents were produced (interim Sustainability Appraisal and other site-specific assessments), regarding the proposed housing land allocations at Oundle.
- 4.26 In order to allow for parties to respond to this additional evidence (published towards the end of the initial consultation period), the draft Plan consultation was extended until 18 February 2019.

### **February 2019 – January 2020: Agree Council responses to 1<sup>st</sup> draft version Local Plan Part 2 representations**

- 4.27 Following the Planning Policy Committee on 18 February 2019, officers began the process of reviewing consultation feedback, consideration of the issues raised and preparation of brief responses to individual representations. Feedback from the 1<sup>st</sup> Draft Plan consultation was reported to the Planning Policy Committee in tranches, between 11 March 2019 and 20 January 2020, with responses to all individual representations were agreed by the Committee:
- [20 January 2020 – Item 5: Strategic Housing Requirements for Oundle \(Local Plan section 8.0\)](#)
  - [10 June 2019 – Item 5: Housing delivery \(Local Plan section 8.0\)](#)
  - [29 April 2019 – Item 6: Vision and Outcomes; Spatial Development Strategy; Monitoring and Implementation \(Local Plan sections 3.0; 4.0; 10.0\)](#)
  - [1 April 2019 – Item 6: Introduction; Area Portrait; Economic Prosperity \(Local Plan sections 1.0; 2.0; 7.0\)](#)
  - [11 March 2019 – Item 5: Natural Capital; Social Capital; Town Strategies \(Local Plan sections 5.0; 6.0; 9.0\)](#)
- 4.28 On 20 January 2020, the Planning Policy Committee reviewed and considered the final batch of representations submitted during the previous (November 2018 – February 2019) consultation.

### **February – March 2020: Focused changes consultation – additional sites**

- 4.29 The review of representations (February 2019 – January 2020) identified a range of significant amendments to the 1<sup>st</sup> draft Plan that would need to be made to ensure that it will be sufficiently robust and “sound”. A significant change was agreed by the Planning Policy Committee, that the Council should consult on two additional development site proposals that were put forward during the draft plan consultation:

- Land to the west of Rushden Lakes – development of 450 houses, employment related uses, a hotel and green infrastructure; and
- Land between Newton Road and Chelveston Road (west of Moulton College), Higham Ferrers – development of a new 145 place secondary school for pupils with Special Education Needs (SEN) with associated access, facilities etc.

4.30 This consultation was combined with consultations upon the Rushden East Sustainable Urban Extension Masterplan and Householder Extensions Supplementary Planning Document (SPD). Stakeholders had an opportunity to respond to either of these documents alongside the two additional development site proposals.

### **Consultation methods**

4.31 A [Smart Survey](#) questionnaire was set up to assist the consultation process. This was open from 10 February – 23 March 2020, inclusive. The following consultation methods were also used to engage all stakeholders:

- The public were made aware of the consultation using a variety of media including the Council’s website, a notice in the Nene Valley News (the free East Northamptonshire District newspaper) and tweets from the council’s Twitter account. Full details of the consultation are set out in the relevant web page<sup>7</sup>.
- Consultation with all relevant consultees on the Local Plan database via email. This included: Town/ Parish Councils; neighbouring authorities; national and local groups / organisations and agents / landowners.
- Press release – the Council prepared a bespoke press release, which was available via the Council website and intranet pages (for internal staff), and sent to the local press<sup>8</sup>.
- Nene Valley News – A copy of the relevant Nene Valley News notice (8 February 2020) may be viewed through the following link: <https://nenevalleynews.co.uk/e-version/page/2/> .
- Libraries and Customer Service Centres – Hard copies of the Draft Plan and supporting documents were made available for viewing in the Council’s Customer Service Centres at Thrapston, Rushden and Oundle. Hard copies were also made available in the local libraries at Irthlingborough, Oundle, Raunds, Rushden and Thrapston.
- Exhibitions – The Council held exhibition events at the end of February 2020. Further details are set out below.
- Feedback consultation forms were printed, containing information about the consultation and how people could get involved. These were available through the

<sup>7</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/11](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/11)

<sup>8</sup> [https://www.east-northamptonshire.gov.uk/news/article/1090/development\\_plans\\_in\\_east\\_northants\\_to\\_be\\_on\\_show\\_for\\_public\\_to\\_have\\_their\\_say](https://www.east-northamptonshire.gov.uk/news/article/1090/development_plans_in_east_northants_to_be_on_show_for_public_to_have_their_say)

exhibitions and a link to the Smart Survey was made available on the council's website.

### **Exhibitions**

- 4.32 A static exhibition was set up soon after the consultation was underway (10 February 2020). This was then set up to inform two “drop in” events at The Boathouse behind Canoe2, Rushden Lakes:
- 27 February 2020 – 10:30am – 6:30pm; and
  - 28 February 2020 – 10:30am – 3:30pm.
- 4.33 Stakeholders were encouraged to submit comments via the online form during the drop in events. Alternatively, hard copy versions of representation forms were available for completion.
- 4.34 Following the close of the exhibition on 28 February, the exhibition was dismantled and moved to the Rushden Customer Service Centre, Newton Road, Rushden. NN10 0PT. Here it was left in situ until the close of the consultation (23 March 2020).

### **June 2020: Agree Council responses to focused changes consultation**

- 4.35 Coinciding with the close of the additional sites consultation, the nation entered the first national Covid-19 lockdown (23 March 2020). This had major impacts upon how preparation of the LPP2 could be managed in future, including:
- Staff switch to home working, with the exception of emergency/ frontline staff, whose roles necessitated attendance at relevant offices/ workplaces;
  - Closure of libraries and deposit points;
  - Public meetings (Committees and Full Council) replaced by virtual meetings (using MS Teams).
- 4.36 Notwithstanding, officers reviewed and processed consultation feedback, with a view to presenting this to the next available meeting of the Planning Policy Committee. The next such meeting was set by the annual meeting of the Full Council (13 May 2020), for 8 June 2020 ([Item 7](#)). This was hosted as the first virtual meeting of the Planning Policy Committee.
- 4.37 Of 39 representations received relating to the proposed Rushden Lakes West allocation, significant objections were raised by Natural England and the Wildlife Trust regarding these proposals (8 June 2020; [Item 2, Minute 40](#)). This was followed by extensive engagement with Natural England, to determine whether suitable mitigation could be delivered to address these concerns. Through this reappraisal of the proposed site allocation it became clear that Natural England's objections could not be overcome in a timely way; such that an alternative deliverable site would need to be identified.
- 4.38 The process for determining whether a suitable alternative site could be allocated was relatively straightforward. The proposed Rushden Lakes West site allocation had been informed by way of an appraisal of five potential locations at Rushden and Irthlingborough. To ensure the evidence base to support the site selection process was sufficiently robust, a more detailed analysis of potential alternative sites around Rushden

was undertaken. This assessment<sup>9</sup> was published in advance of a further alternative sites consultation which was deemed necessary before the full Local Plan could be published for Pre-Submission Draft (Regulation 19) consultation.

### **October – November 2020: Focused changes consultation – additional sites (alternatives)**

- 4.39 Engagement with Natural England during summer 2020 revealed that it was unlikely that these concerns regarding the impacts of the proposed Rushden Lakes West site allocation could be satisfactorily overcome. Legal advice was sought, which confirmed that further consultation would be needed regarding alternative site specific proposals, prior to publication of the Plan for statutory Regulation 19 consultation.
- 4.40 Legal advice was also sought regarding the status of the Rushden East Masterplan Framework Document (MFD). The 1<sup>st</sup> draft MFD was consulted on during February – March 2020, but this remained outside the Local Plan process. The advice was that for the MFD to have any standing in decision making it would be necessary for this to be incorporated into the Local Plan Part 2 or as a separate development plan document; as the MFD defines the extent of the Rushden East development area (i.e. a site specific proposal).
- 4.41 The Planning Policy Committee (21 September 2020, Minutes<sup>10</sup>) approved land to the south of Bedford Road, Rushden as an alternative viable site and the inclusion of a new Local Plan Part 2 chapter on the Rushden East Sustainable Urban Extension. This would also allow for the incorporation of the MFD into the Local Plan.
- 4.42 A further focused consultation on an alternative additional site and the inclusion of the Land east of A6/ Bedford Road (to the south east of Rushden) was therefore set up, to address the following issues:
- A potential alternative to RLW, to ensure delivery of the 450 dwellings required; and
  - Rushden East SUE – Incorporation of the MFD for the Rushden East SUE to the Local Plan Part 2.

#### ***Consultation methods***

- 4.43 A [Smart Survey](#) questionnaire was set up to assist the consultation process. This was open from 5 October – 16 November 2020, inclusive. The following consultation methods were also used to engage all stakeholders:
- The public were made aware of the consultation using a variety of media including the Council's website and tweets from the council's Twitter account. Full details of the consultation are set out in the relevant web page<sup>11</sup>.

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<sup>9</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11974/background\\_paper\\_-\\_assessment\\_of\\_alternative\\_site\\_options](https://www.east-northamptonshire.gov.uk/downloads/file/11974/background_paper_-_assessment_of_alternative_site_options)

<sup>10</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/1089/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/1089/planning_policy_committee)

<sup>11</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/12](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/12)

- Consultation with all relevant consultees on the Local Plan database via email. This included: Town/ Parish Councils; neighbouring authorities; national and local groups / organisations, and agents / landowners.
- Press release – the Council prepared a bespoke press release, which was available via the Council website and intranet pages (for internal staff), and sent to the local press<sup>12</sup>.
- Virtual Exhibitions for Land East of A6/Bedford Road and the Rushden East SUE, provided in a similar format to a physical exhibition that we would have undertaken prior to the Covid-19 restrictions<sup>13</sup>.
- In accordance with Covid-19 regulations, consultation documents were only available to view at the Council’s Cedar Drive (Thrapston) and Rushden Centre offices by appointment. Libraries and the Oundle Customer Service Centre were closed throughout the consultation period.
- Feedback consultation forms were printed, containing information about the consultation and how people could get involved. These were available to download, alongside the Smart Survey form on the council’s website.

### **December 2020 – January 2021: Agree Council responses to 2<sup>nd</sup> focused changes consultation and Pre-Submission version Local Plan Part 2 for consultation and submission to the Secretary of State**

- 4.44 Following the closing date for the 2<sup>nd</sup> Focused Changes consultation (16 November 2020), representations were collated and reported to the Planning Policy Committee on 10 December 2020 ([Item 6](#)). These 55 representations received, were grouped by issues/ matters raised, with a single response to each such issue.
- 4.45 The Planning Policy Committee (10 December 2020, [Minute 283](#)) considered the representations and responses. The following matters were agreed, which would allow the Pre-Submission Draft (Regulation 19 version) of the Plan to be finalised:
- To approve the allocation of land to the east of the A6/Bedford Road, Rushden in place of the proposed allocation at Rushden Lakes West incorporating the proposed northern boundary extension as shown in Appendix 4
  - Agree the officer responses to the representations;
  - Agree revised wording to draft policies EN28 and EN33; and delegated powers re further revisions to the Plan text.
- 4.46 The next Planning Policy Committee (27 January 2021, [Item 5](#)) agreed the Pre-Submission Draft Local Plan Part 2 for consultation. This was supported by published supporting submission documents (Sustainability Appraisal; Habitat Regulations Assessment; Equalities Impact Assessment; Health Impact Assessment – Item 5, Appendix 3) and the comprehensive library of supporting documents (Item 5, Appendix

<sup>12</sup> [https://www.east-northamptonshire.gov.uk/news/article/1156/have\\_your\\_say\\_on\\_rushden\\_planning\\_proposals](https://www.east-northamptonshire.gov.uk/news/article/1156/have_your_say_on_rushden_planning_proposals)

<sup>13</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/12](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/12)

4). The Schedule of Proposed Changes (Appendix 5) explains how the changes agreed since the 1<sup>st</sup> Draft Plan consultation (November 2018 – February 2019) have informed the Pre-Submission Draft version of the Plan.

- 4.47 The Planning Policy Committee (27 January 2021, [Minutes](#)) identified a number of further changes that would need to be made, but agreed publication of the plan for Regulation 19 consultation and submission to the Secretary of State by 31 March 2021.

### **February – March 2021: Consultation on Pre-Submission version Local Plan Part 2 (Regulation 19)**

- 4.48 Regulation 19: The Council's Proposed Submission Local Plan Part 2 and supporting documents (Sustainability Appraisal, Habitat Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment)<sup>14</sup>, were published in accordance with Regulation 19 for a six week consultation period lasting from 5 February – 19 March 2021. The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement.
- 4.49 A submission ready version of the plan was made available for stakeholders and the public to comment on for a minimum of 6 weeks. In accordance with the Local Plan Regulations, this consultation was formal and statutory seeking specifically the Plan's soundness for Examination in Public.
- 4.50 The consultation under Regulation 19 is a procedural consultation. Feedback from this consultation will be submitted to the Secretary of State alongside the Local Plan and supporting documentation. Following submission, the Secretary of State will appoint a Planning Inspector to examine the Local Plan, against the tests of soundness.
- 4.51 Regulation 19 is the final statutory stage in the plan-making process, prior to submission of the Local Plan to the Secretary of State. It requires that statutory consultees and interested parties be notified that the Council has published its Local Plan Part 2 and this is to be submitted for independent examination by a Planning Inspector against the tests of soundness. **Further details regarding the issues raised through the Regulation 19 consultation in relation to the legal requirements, tests of soundness and consultation methods set out at Appendix 2.**

### **March 2021: Submission of Local Plan Part 2 to Secretary of State for Examination (Regulation 22)**

- 4.52 The Council assessed the comments received during the formal Regulation 19 consultation and considered that the Local Plan is sound, therefore, can be submitted for Examination in Public (EiP). Around **240 representations** from **58 separate respondents** were received during the consultation (5 February – 19 March 2021, inclusive). The issues raised through the representations are summarised at Appendix 2.

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<sup>14</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/14](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/14)

- 4.53 Copies of the full unredacted representations are submitted to the Secretary of State alongside the Plan itself and supporting documents. Redacted versions of these will be published on the relevant web page<sup>15</sup>.
- 4.54 The Plan was submitted to the Secretary of State for Housing, Communities and Local Government on 29 March 2021. The Secretary of state will then appoint an independent Planning Inspector to undertake the independent examination (Examination in Public) of the Local Plan Part 2.

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<sup>15</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/14](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/14)

# **Section 3: Council's process and actions to ensure compliance with the requirements of the Duty to Cooperate**

## 5.0 Duty to Cooperate

- 5.1 The Duty to Cooperate is a statutory requirement for plan-making, introduced through the 2011 Localism Act as an amendment to the 2004 Planning and Compulsory Purchase Act (section 33A). It replaced the previous strategic function of the (now defunct) Regional Strategies (in this case, the former East Midlands Regional Plan) and places a legal duty on local authorities and other public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation, in the context of strategic cross boundary matters; i.e. Local Plan matters that have implications for areas beyond the District boundary. In order to demonstrate on-going joint working strategic plan making, authorities are required to prepare and maintain statements of common ground documenting the cross-boundary matters being addressed and progress in cooperating to address these.

### **Engagement with North Northamptonshire local planning authorities**

- 5.2 Strategic cross-boundary issues were fully considered in the development of the JCS. This extensive work is documented in the North Northamptonshire Joint Core Strategy 2011-2031 [Pre-Submission Plan Statement of Consultation](#).
- 5.3 A significant issue raised during the development of the JCS was in relation to the longer term growth of Northampton. Two alternative strategic sites; land to the East of Northampton and Roundhill Park were promoted during the preparation of the JCS within the Borough of Wellingborough (within the North Northamptonshire Plan area) to help to meet the needs of Northampton. Northampton Borough Council also sought recognition of the need to consider the post 2029 growth of Northampton, and a specific change was made to para 1.14 of the JCS to recognise this. No significant issues outside the North Northamptonshire area affecting the District of East Northamptonshire arose through the JCS process.
- 5.4 The Inspector who examined the JCS considered compliance with the Duty to Cooperate, concluding:

*“6. In the Statement of Consultation, Addendum and updates (June/July 2015), the JPU on behalf of the Councils has satisfactorily documented where and when co-operation has taken place, with whom and on what basis, as well as confirming that such positive engagement has and will continue. This includes previous co-operation on a wider regional and sub-regional basis in relation to implementing the former East Midlands Regional Strategy and the direct involvement of Northamptonshire County Council (NCC), who are part of the Joint Committee that prepared the plan, in accord with the Joint Committee Order (SI 2008 No. 1552) under which it operates.*

*7. There is also clear evidence of continuous co-operation with the equivalent JPU for the rest of the county (West Northamptonshire), amongst others; the outcomes of which demonstrate constructive engagement by the JPU/Councils on an on-going basis, including in relation to the proposed main modifications. In addition, the plan is consistent with the relevant Corporate Plans of all four Councils, as well as the County Council.*

*8. For the time being at least, none of the area’s neighbouring Councils has specifically sought help in meeting their local housing or other needs and the JPU has not asked any other authority to help it; nor does it intend to. Furthermore, no significant cross boundary*

*strategic issues relating to co-operation with neighbouring Councils or Reg. 4 bodies remain unresolved. Any future requests that may come from neighbours for help in regard to their objectively assessed needs would be a matter for a plan review to consider at the appropriate stage(s). Therefore, given the absence of any clear evidence to the contrary, I am satisfied that the duty to co-operate has been met.” ([Inspector’s Report, 22 June 2016](#)).*

- 5.5 Specifically in relation to the sites promoted to meet the needs of Northampton, within the Borough of Wellingborough (but with limited or no implications for the Corby, East Northamptonshire or Kettering local authority areas), the Inspector concluded:

*“Further major development to the north of Northampton might well assist in bringing forward the delivery of the full A43 dualling sought by NCC through additional financial contributions, but is neither required to meet objectively assessed needs at present, nor consistent with the Plan’s overall spatial strategy, which is sound. Such proposals may need to be considered in the long term to help meet the county’s needs, but are a matter for a review of this Plan and/or that of the West Northamptonshire JCS to address in due course. Similar conclusions apply in respect of land east of Northampton (and west of Ecton) in Wellingborough district, notwithstanding its relatively sustainable location on the edge of the existing built up area of the town.” (Inspector’s Report, paragraph 129)*

- 5.6 It is clear that strategic cross-boundary issues have been fully considered during the development of the Local Plan Part 1 (JCS). As stated, these predominantly affected the Borough Council of Wellingborough rather than the other North Northamptonshire partner local authorities. Alongside the work undertaken by the Joint Planning and Delivery Unit (JPDU; formerly the Joint Planning Unit), East Northamptonshire Council has also undertaken ongoing engagement with Duty to Cooperate bodies. Further details about key meetings is set out below, illustrating the proactive work undertaken by the Council in the preparation of the LPP2.

- 5.7 The Council will continue to cooperate with North Northamptonshire partner local authorities as set out in para 1.14 of the JCS and para 1.25 of the Pre-Submission Draft LPP2. It will also cooperate with other neighbouring local planning authorities regarding future growth proposals. It should be noted, that the Inspector’s Report for the North Northamptonshire JCS concluded at para. 8 that the duty to cooperate has been met and *“any future requests that may come from neighbours for help in regard to their objectively assessed needs would be a matter for a plan review to consider at the appropriate stage(s)”*.

- 5.8 Should there be a short term issue relating to the five year supply in the North Northamptonshire housing market area, in the first instance the Council will continue dialogue and cooperation with partner North Northamptonshire authorities on this matter. In the light of the above, should this be an issue for the LPP2 then in the first instance this should be addressed through a review of the JCS (Local Plan Part 1).

### **Engagement with other neighbouring local planning authorities**

- 5.9 In respect of engagement with the partner North Northamptonshire local planning authorities, the JCS has already provided the mechanism by which the four authorities have fulfilled both the spirit and legal requirements of the Duty to Cooperate. Since 2016 the Council has also engaged with the following neighbouring local authorities in preparing both the LPP2 and their respective Local Plan reviews:

- Bedford Borough Council;
- Huntingdonshire District Council;
- Peterborough City Council;
- Rutland County Council.

5.10 These replacement Local Plans are all at various stages in preparation but are ahead of the LPP2. Most recently, officer representations were submitted in response to the following draft Local Plans:

- Huntingdonshire Local Plan (January 2018);
- Peterborough Local Plan (January 2018);
- Rutland Local Plan (September 2017; followed up by North Northamptonshire Joint Planning and Delivery Unit, November 2020, on behalf of East Northamptonshire Council).

5.11 These responses each sought to provide constructive feedback in respect of the respective draft Local Plans. The Huntingdonshire and Peterborough pre-submission draft Local Plan consultation responses were also reported to the Planning Policy Committee on 19 February 2018 ([Agenda Item 6](#)).

### ***Bedford Borough Local Plan***

5.12 Representations were agreed by the Planning Policy Committee on 19 February 2018 regarding the pre-submission draft Bedford Local Plan (alongside those for the Huntingdonshire and Peterborough Local Plans). An objection was raised to the pre-submission draft Bedford Local Plan 2035, in respect of the adequacy of transport modelling undertaken to date in support of the promotion of the new settlement proposal at Colworth Garden Village (Agenda Item 6, paragraph 13.1(3)). This was intended to emphasise that the Colworth proposals need to be supported by a robust evidence base and did not relate to the principle of developing a new Garden Village itself.

5.13 Due to concerns regarding the potential wider (strategic) implications of the Colworth Garden Village proposal, the Bedford Local Plan was revised in response to the early 2018 pre-submission draft consultation. The Colworth proposal was subsequently removed; with the Plan submitted with a 2030 end date (compared to 2035, previously proposed). The Bedford Local Plan 2030 was adopted in January 2020.

5.14 Bedford Borough Council commenced a review of the Borough Local Plan in July 2020. The Planning Policy Committee (21 September 2020, [Item 7](#)) endorsed the officer draft to the Bedford Borough Local Plan Issues and Options consultation, 14 July – 4 September 2020 (Planning Policy Committee, 21 September 2020, [Minutes](#)). East Northamptonshire Council's response highlighted potential emergent proposed options in the replacement Borough Local Plan that could have significant cross boundary implications for East Northamptonshire.

### **Oxford/ Milton Keynes/ Cambridge growth corridor (OCA)**

5.15 Alongside the ongoing cooperation as part of the preparation of the LPP2, the Council has also engaged proactively with partners in discussions regarding the work of the National Infrastructure Commission in relation to the Cambridge-Milton Keynes-Oxford Corridor and future opportunities in the corridor and mechanisms to deliver this. This

process is being led by the North Northamptonshire Joint Planning and Delivery Unit (NNJPDU), but has required active participation by East Northamptonshire Council officers at meetings of all the LEPs and local authorities within the corridor.

- 5.16 The council is a signatory to the joint response to the second stage report Strategic Planning in the Cambridge-Milton Keynes-Oxford Corridor: A Discussion Paper. The council will continue to participate in these discussions, further demonstrating its proactive involvement in the discussions relating to wider strategic/ sub-regional issues. It will duly engage in ongoing discussions around development proposals associated with the Oxford/ Milton Keynes/ Cambridge growth corridor. In general, however, issues associated with the growth corridor will need to be addressed through a JCS review, to be undertaken by the new North Northamptonshire Council after April 2021. A new Local Development Scheme/ timetable was agreed by the Joint Planning Committee on [2 March 2021](#).

### **National bodies**

- 5.17 The Council has engaged with national statutory consultees (including the Environment Agency, Historic England and Natural England). This engagement is also a statutory obligation under the Duty to Cooperate. During the earlier stages of preparing the Local Plan evidence base, officers have worked closely with the Environment Agency and Lead Local Flood Authority (Northamptonshire County Council) in updating the Strategic Flood Risk Assessment. This was signed off by the Environment Agency and published in [February 2020](#).
- 5.18 Significant engagement was also necessary with Natural England throughout the Plan-making process. The potential implications of the need for additional deliverable housing site allocations in the south of the District to offset ongoing delays in bringing forward the two Sustainable Urban Extensions (Rushden East and Irthlingborough West). The need to allocate one or more additional sites was noted by the Council in autumn 2019.
- 5.19 The site selection process identified Rushden Lakes West as the Council's preferred site (Planning Policy Committee, 17 December 2019). Natural England's formal [objection](#) to the proposal during the focused changes/ additional sites consultation (February – March 2020) was followed by a process of engagement between promoters of the site, Natural England and the Council during summer 2020. This entailed the need to consult upon alternative site proposals (October – November 2020). The representation in response to this further consultation ([12 November 2020](#)) confirmed that in Natural England's view the alternative Rushden South East (Land east of A6 Bypass/ Bedford Road) is immediately favourable from an environmental perspective compared to Rushden Lakes West (RLW).
- 5.20 The examples of the Environment Agency and Natural England cited above indicate that the Council has actively engaged through out with relevant national consultation bodies. These processes of engagement have had significant for individual site specific policies; e.g. EN28 (Land East of Bedford Road/ A6 Bypass) and EN40 (Former Rushden and Diamonds FC Stadium site, Irthlingborough).

### **Duty to Cooperate meetings**

- 5.21 As stated, the Duty to Cooperate is a continuous process. The frameworks and structures are well established for engagement with adjacent North Northamptonshire

authorities. The Wider Team Meetings (monthly) and Northamptonshire Officer Meetings (6-monthly) provide an opportunity for officers of the North Northamptonshire and West Northamptonshire local planning authorities to actively engage.

5.22 For other neighbouring local planning authorities (outside Northamptonshire), it has been necessary for East Northamptonshire Council to be proactive in maintain an appropriate and proportionate engagement. Details of engagement with the four relevant local authorities are set out below.

5.23 Since March 2020 meetings have taken place remotely, via MS Teams or Zoom. Examples of specific meetings are cited below, to show how relevant bodies have been engaged throughout the Plan-making process.

### ***Bedford Borough Council***

5.24 ENC raised concerns about the supporting evidence base for the Bedford Local Plan Colworth Garden Village proposal, through the 1<sup>st</sup> Pre-Submission Bedford Local Plan consultation. Accordingly, two Duty to Cooperate meetings were held between ENC and BBC during 2018:

- 25 January 2018;
- 1 October 2018.

5.25 Most significantly, ENC raised an objection in respect of the adequacy of traffic modelling undertaken to support the delivery of the proposed new settlement identified as Colworth Garden Village. Through the Duty to Cooperate process, together with Bedford Borough Council's desire to progress the Local Plan rapidly to submission and examination, the Borough Council took a decision to exclude the Colworth proposals from the Local Plan. Instead, Bedford Borough Council amended the Local Plan end date, from 2035 to 2030. On this basis, the Plan was adopted in January 2020.

5.26 Adoption of the Bedford Borough Local Plan was shortly followed by the start of a Local Plan review (Regulation 18 consultation) in 2020 (July – September 2020). Alongside this process, the Council held a further Duty to Cooperate meeting with colleagues at the Borough Council on 17 August 2020 to discuss potential Local Plan development options and mutual implications of these for the Borough and North Northamptonshire areas.

### ***Rutland County Council***

5.27 ENC joined Rutland County Council and other authorities along the A1 corridor (e.g. South Kesteven; Peterborough) in setting up a forum of A1 local planning authorities. This was led by Rutland County Council, in response to the emerging potential Garden Village proposals for St George's Barracks (Edith Weston) or Woolfox. Meetings were held (also involving Highways England) to consider the potential cumulative impacts of the Rutland Garden Village and other significant proposals upon the A1 (Great North Road) corridor:

- 24 January 2019;
- 5 June 2019.

### ***Northamptonshire local planning authorities***

5.28 ENC regularly engages with other North Northamptonshire local planning authorities through the monthly Wider Team Meetings. Additionally, officers also meet representatives of other Northamptonshire authorities:

- North Northamptonshire Investment Framework – 14 and 20 September 2018;
- Northamptonshire officers team meetings – 6-monthly;
- West Northamptonshire Joint Core Strategy review meeting – 12 July 2019 (further meetings anticipated);

### ***National bodies***

5.29 A significant strategic issue for the Local Plan Part 2 relates to the Nene Valley; specifically the Upper Nene Valley Gravel Pits Special Protection Area (SPA)/ Ramsar site and flood risk management. The relevant national bodies for each are Natural England and the Environment Agency respectively.

5.30 Through the 1<sup>st</sup> draft Local Plan Part 2 consultation (November 2018 – February 2019), Natural England highlighted ongoing concerns about the cumulative impacts of additional development upon the SPA/ Ramsar site. In response, meetings were held with representatives of Natural England to overcome these issues:

- 10 June 2019;
- 25 July 2019.

5.31 By autumn 2019 the need to allocate additional housing sites within the south of the Plan area was noted to pose potential implications for the SPA/ Ramsar site. Natural England had previously raised potential issues through the 1<sup>st</sup> draft Local Plan consultation (November 2018 – February 2019), but these were general concerns about the impacts of development across most of the Plan area.

5.32 The Council's decision to select Rushden Lakes West as the preferred site (consulted upon during February – March 2020) prompted Natural England to raise a number of significant objections to these proposals, which prompted the Council to meet with representatives of Natural England and the site's promoters, to see whether Natural England's objections could be overcome in line with the Council's Local Development Scheme and the aspirations of the promoter. These meetings took place at the following dates and informed the Council's decision (September 2020) to allocate Land East of Bedford Road/ A6 Bypass as a viable alternative to Rushden Lakes West:

- 25 June 2020; and
- 21 July 2020.

5.33 Natural England considered that it would be excessively challenging for potential development proposals to overcome the outstanding objections. Accordingly, a greatly less sensitive alternative site (Land East of Bedford Road/ A6 Bypass, to the south east of Rushden), was selected to replace Rushden Lakes West.

### ***Other neighbouring local planning authorities***

5.34 For other neighbouring authorities, no significant issues have been identified that are not resolved through the JCS/ Local Plan Part 1. Accordingly, no specific Duty to Cooperate

meetings, have been set up with Huntingdonshire District and Peterborough City Councils.

- 5.35 Instead, issues have been addressed through email exchanges and Pre-Submission consultation responses for the Huntingdonshire and Peterborough Local Plans (February 2018). Furthermore, these local planning authorities, alongside Rutland County Council, are also represented through the A1 growth corridor forum.

#### **Duty to Cooperate overview**

- 5.36 Relevant bodies have been consulted and engaged throughout the LPP2 preparation process (since January 2017). Plan policies have evolved in response to feedback from Duty to Cooperate consultation bodies.
- 5.37 The level of engagement has been in proportion to potential issues arising as the Plan has evolved. Engagement with local authorities such as Huntingdonshire and Peterborough, for whom the Plan will have little/ no implications has been “light touch” and proportional to matters that have arisen.
- 5.38 By contrast, engagement with other local authorities that may be significantly affected by the Plan (notably Bedford Borough Council) has been more extensive. Similarly, engagement with Natural England has been more detailed and active (given the potential implications of the LPP2 for the Upper Nene Valley Gravel Pits SPA/ Ramsar site) compared to that for other statutory consultees.

# **Section 4: Summary of the process – main issues raised during the course of Plan preparation**

## 6.0 Regulation 18 Consultation: scope of the LPP2 (January – March 2017)

- 6.1 The LPP2 was formally launched under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012), by way of a six week consultation with a range of key consultees and stakeholders, in order to assess its scope with regard to the range of themes and topics to be covered. This ran from **27<sup>th</sup> January – 13<sup>th</sup> March 2017** (inclusive).
- 6.2 All consultees listed in the Planning Policy consultation database were informed directly of the consultation, by way of email. Comments were submitted via email or using the bespoke consultation form. Verbatim comments were then copied into a standard Excel format, which was then incorporated into a report for the Planning Policy Committee on 3<sup>rd</sup> April 2017 ([Item 5, Appendix 2](#)).. For the purposes of the Duty to Cooperate, relevant Specific or Statutory bodies who were consulted as part of the scoping stage and throughout the LPP2 process:
- 6.3 Full details of the Regulation 18 consultation are set out at Appendix 1 to this report.

## 7.0 Stakeholder workshops (May 2017 – April 2018)

- 7.1 The Local Plan stakeholder workshops followed on from the Regulation 18 consultation. The initial round of thematic workshops was followed by more localised workshops for each of the six urban areas, with further such workshops for the rural areas.
- 7.2 The ideas and concepts that arose through these workshops formed the basis for drafting the LPP2 itself. Ongoing engagement, with Members and Town/ Parish Councils, has taken place formally through the Planning Policy Committee and more informally through the workshops themselves. This stage has allowed local representatives and other stakeholders to shape how the LPP2 will evolve.
- 7.3 The workshops have informed several decisions regarding individual policies and policy content. The following policies (site specific and spatial) have been specifically guided and informed by the outcome of the workshops:
- EN2-EN5: Settlement boundary criteria
  - EN16: Tourism, cultural developments and tourist accommodation;
  - EN20: Relocation and/ or expansion of existing businesses;
  - EN21: Town centres and primary shopping frontages;
  - EN34: Reimagining Town Centres – guiding principles;
  - EN38: Federal Estates/ former Textile Bonding factory site, Newton Road/ Midland Road, Higham Ferrers;
  - EN39: Former Select & Save, 13-21 High Street/ St Peter's Way Car Park, Irthlingborough;
  - EN40: Former Rushden and Diamonds FC Stadium site, Nene Park, Diamond Way, Irthlingborough;
  - EN41: Riverside Hotel, Station Road, Oundle.

7.4 Detailed feedback from the consultation (including hand written comments/ notes) was summarised and presented to the Planning Policy Committee in stages during 2017-18 (section 4.0, above).

## 8.0 1<sup>st</sup> draft version Local Plan Part 2 consultation feedback and issues raised (November 2018 – January 2020)

8.1 A schedule of representations and a summary of the issues raised during the draft [Local Plan Part 2](#) consultation were reported to the Planning Policy Committee on [18 February 2019](#) (Item 6). Through the 1<sup>st</sup> Draft Plan consultation, 298 responses were received, making a total of 2500 separate representations or comments.

8.2 An overarching summary of the 1<sup>st</sup> draft Local Plan representations is set out below. This includes examples of individual representations received regarding the most substantive issues raised, which may have significant implications for the Plan's content (Vision, outcomes and/ or policies). This builds upon the summary feedback regarding the 1<sup>st</sup> draft Plan consultation, noted by the Planning Policy Committee on 18 February 2019 ([Minute 417](#)).

### **Section 1.0**

8.3 **Introduction / general:** The representations received during the 1<sup>st</sup> Draft Plan consultation raised a number of site specific and/ or generic matters which it was considered needed to be addressed for the LPP2 to be finalised for submission:

- Various comments relating to length and timing of the consultation period;
- Concerns that the site assessment evidence for Oundle was not made available at the start of the consultation period;
- The structure of the draft Local Plan could be reordered to better fit the structure of the Joint Core Strategy (JCS) and to allow some of the more technical issues to sit in appendices.
- Consideration needs to be given to the JCS commitment to identify additional housing land if the major strategic housing sites are not delivered.
- Various requests for additional housing sites to be included within the draft Local Plan.

8.4 Overarching strategic issues that underpin the whole Plan/ strategy have been raised by specific consultation bodies (statutory consultees). One example of such a representation is set out below.

8.5 **Flood risk assessment:** Comments received from the Environment Agency state that with regard to Policy 5 of the North Northamptonshire Joint Core Strategy 2011-2031 (2016), the allocated sites in the East Northants Local Plan Part 2 should ensure they meet the requirements of Policy 5 Water Environment, Resource and Flood Risk Management. Therefore, any sites in the functional floodplain will be contrary to criteria specified in Policy 5a. In summary, 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. As appropriate, the Plan should be clearly linked to relevant policies in the adopted Joint Core Strategy for North Northamptonshire. The updated version of the SFRA has been updated and finalised in February 2020.

## **Sections 2.0-3.0**

### **8.6 Area Portrait / Vision:**

- Whilst some detailed comments are raised, no significant representations have been submitted in respect of this section of the draft Local Plan.

## **Section 4.0**

### **8.7 Spatial Development Strategy:** Representations predominantly related to the site selection process (i.e. evidence base), with reference to the following issues:

- Disagreements over the spatial categorisation of villages;
- Policy EN2 'Settlement Boundaries – Urban Areas', Policy EN3 'Settlement Boundaries – Freestanding Villages', and Policy EN4 'Settlement Boundaries – Ribbon Developments': various comments relating to the definition and approach to development, issues raised include unnecessarily rigid approach, policies not appropriate, revisions suggested to wording.
- Need to make additional allocations in villages, particularly where there is no prospect of a neighbourhood plan coming forward.

### **8.8 Spatial development strategy (Settlement boundaries)** – Comments received from Glapthorn Parish Council: *“Refinements requested on specific Policies: Policy EN 3 addresses settlement boundaries in freestanding villages. The intentions behind this Policy are supported but there is some ambiguity as to whether development on the periphery outside a settlement boundary designated in a made Neighbourhood Plan, is acceptable. This could be clarified by adding an additional clause (f) “development beyond the settlement boundary in a made Neighbourhood Plan will be excluded.” This then gives weight also to EN5.”*

### **8.9** *“EN4 relates to settlement boundaries and ribbon developments but just to two specific areas (in Irthlingborough and Raunds). Given that many villages, not least Glapthorn, are linear in nature and have appropriate NP policies, it would be helpful to have another EN Policy directly addressing linear freestanding villages and ribbon development – the wording of clauses b), c) and d) of EN 4 could then be applied to linear villages in a separate Local Plan Policy.”*

## **Section 5.0**

### **8.10 Natural Capital:**

- A number of representations seeking detailed changes to policy wording and emphasis;
- Clearer approach to the designation of greenspace required;
- References to green infrastructure are too generic, need to be more specific; e.g. importance of trees and woodlands needs more emphasis;
- Discrepancies arising over open space standards being applied, e.g. Rushden East Sustainable Urban Extension.
- Challenges to Policy EN10 'Enhancement and Provision of Open Space' and Policy EN11 'Enhancement and Provision of Sport and Recreation Facilities'.

## **Section 6.0**

### **8.11 Social Capital:**

- No policy direction has been provided in respect of health, wellbeing and community infrastructure, further policy direction is required;
- Detailed changes proposed in respect of Policy EN12 'Design of Buildings';
- Scope to be increased beyond new buildings, to include household extensions.

## **Section 7.0**

### **8.12 Economic Prosperity:**

- Recognition of the significant amount of new employment related development and growth that has taken place since the start of the draft Local Plan period;
- Need for enhanced broadband provision;
- Need to promote redevelopment proposals for alternative uses at significant brownfield sites (e.g. Nene Park, Irthlingborough; Rockingham motor racing course) has been recognised;
- Concerns raised about the impact of certain types of economic development such as warehousing / distribution on environmentally sensitive uses;
- Detailed development management comments raised in relation to criteria; e.g. proposed parking standards.

## **Section 8.0**

### **8.13 Housing Delivery:**

- Support for JCS Policy 13 and request for clarification of intended outcomes for EN 23 (1<sup>st</sup> Draft Plan);
- Rural housing should not be calculated on a percentage basis, but should be based more on the sustainability of settlements;
- Chelveston cum Caldecott PC – Indicative rural figure is given at 30: NDP policy H4 supports approximately 36 challenges use of word "significantly";
- Huntingdonshire DC supports the approach to housing distribution (urban/ rural mix) and does not consider it to be a barrier to housing delivery within Huntingdonshire district;
- Objections raised to the approach to identifying proposed housing site allocations in Oundle;
- Detailed representations raised in respect of the suitability of specific sites for development;
- Concerns raised over the emphasis / justification placed on higher value properties;
- Policy EN28 'Housing Mix and Tenure to Meet Local Demand' has raised a number of comments around its justification and approach;
- Northamptonshire Adult Social Services (NASS) welcomes recognition of the need for Older People's housing and Cat 3 standard housing and welcomes well located specialist housing for older people in urban area and suitable sites in the largest villages for specialist housing for older people;
- Challenges raised to the threshold figures for the provision of specialist housing provision related to Policy EN29 'Specialist and Older Persons Housing Provision', and Policy EN32 'Self and Custom Build Housing';

- Concerns arising over the need to recognise the rural housing figures as minimum requirements;
- A number of alternative housing site allocations have been proposed.

8.14 **Housing delivery rates** A critical aspect of the plan-making process for the Local Plan Part 2 involves calculating the quantum of housing that needs to be allocated to ensure that the minimum level of housing requirement set out in the JCS is met. Policy 29/ Table 5 of the JCS, specifies the quantum of housing numbers that are expected to be delivered during the Local Plan period (2011-31) for each of the six towns within the East Northamptonshire area.

8.15 In the case of development in the rural area, this will be limited to that required to support a prosperous rural economy or to meet a locally arising need that cannot be met more sustainably at a nearby larger settlement” (Policy 11(2)(a)). The rural housing requirement has already been met as at April 2018. Therefore no further rural housing land allocations would need to be made in the Local Plan. However, Neighbourhood Plans could allocate further housing sites if there is a local desire to do so. Similarly, future rural exceptions housing schemes and/ or small scale rural windfall or infill developments could continue to deliver rural housing for the entire duration of the Plan period.

### **Section 9.0**

8.16 The main issues raised through this non-statutory consultation, focused upon site specific proposals. These matters predominantly relate to either alternative greenfield site proposals (section 8.0) or site specific Town Strategies (section 9.0) policies. Representations relating to individual proposed site allocations, or proposed alternatives, are considered further below.

8.17 **Rushden:** Comments were received regarding the spatial character of the town and the implications of specific policies and proposals, including implications of re-development proposals for biodiversity, the town centre economy and different social groups, to include “hard to reach groups”. These recognise and generally support the concept of re-imagining to enhance the character of the town as a whole.

- Concerns over the built character of recent residential development: to include the number of flats constructed in the town over recent years together with the need to maintain sufficient residential and visitor parking provision in and around the town centre.
- Evidence of future need to inform redevelopment proposals for Splash Pool site – preparation of a built sports facility strategy.
- Future parking needs and provision arising from reconfiguration of streets and new connections.
- Impact of redevelopment upon wider parking provision in and around the town centre.
- Flood risk status (Flood Zone 2), and the implications of any redevelopment proposals upon the Skew Bridge Dyke culvert, foul and surface water drainage.
- Impact of redevelopment proposals upon heritage assets, including former 19<sup>th</sup> Century boot and shoe buildings.
- Need to include sufficient provision for waste water infrastructure.

8.18 **Irthlingborough:** A number of site specific representations received to include:

- Former Rushden and Diamonds FC Stadium Site, Nene Park, Diamond Way, Irthlingborough ( Policy EN39) – “the most significant brownfield site within the town”;
- Sport England has raised concerns about the loss of sports facilities for the area;
- The Environment Agency has supported the specific policy proposals for the site with regard to the range of flood compatible uses. Promoters of the site are seeking to broaden the range of acceptable uses and are seeking to review challenge the Environment Agency’s flood risk evidence.
- The North Northamptonshire Joint Planning and Delivery Unit has also raised some concerns about the promotion of main town centre uses at the site which is an “out of centre” location

8.19 **Oundle:** A large number of representations received, raising issues including:

- The spatial character of the town and potential for expansion to the north;
- Raises concerns that 9.0 goes beyond the Oundle Neighbourhood Area into surrounding parishes (Ashton, Barnwell or Glapthorn);
- Wider issues include availability of car parking within the town and the traffic impact of additional development around the urban area;
- Majority of comments were concerned with specific development proposals in section 8.0.

8.20 **Thrapston:** A number of site specific representations regarding redevelopment proposals for the Cattle Market, Market Road, Thrapston site – policy EN41.

### **Section 10.0**

8.21 **Monitoring and Implementation:**

- The draft Local Plan does not adequately address the infrastructure implications, particularly for the rural areas;
- Need to ensure current priorities are aligned with key strategy documents e.g. Northamptonshire County Council’s planning obligations framework.

### ***How the main issues raised through the Draft Plan (site specific proposals) consultation were addressed***

8.22 During summer 2018, prior to finalising text for the consultation version LPP2 document, officers undertook a review of the evidence base necessary to support the LPP2 at Examination. This was necessary to ensure the Plan would meet the tests of soundness when examined by the independent Planning Inspector. These studies and assessments, submitted alongside the LPP2 itself, related to:

- Plan viability (policy obligations);
- Transport modelling, for proposed site allocations;
- Sustainability Appraisal (SA);
- Habitat Regulations Assessment (HRA);
- Equalities Impact Assessment (EIA).

8.23 In responding to representations, responses to individual representations were categorised as follows:

- No further changes required
- Proposed changes to text and/or policies
- Additional evidence required to determine whether amendments are required to address the representation.

8.24 In response to the 1<sup>st</sup> Draft Plan consultation, the Pre-Submission version LPP2 was refined, where necessary to reflect the conclusions of the updated technical work and issues raised in representations during the Draft Plan (site specific proposals) consultation. Responses to these representations received in response to the Emerging Plan were published alongside the Pre-Submission LPP2, to show how responses informed its development and refinement.

### **Subsequent focused changes consultations (February – March 2020; and October – November 2020)**

8.25 The additional focused changes (additional sites) consultations were necessary, in view of outcomes from the earlier 1<sup>st</sup> draft Plan consultation. These focused changes consultations allowed for the addition of the following site specific proposals into the LPP2:

- EN17: Land south of Chelveston Road, Higham Ferrers;
- EN28: Land east of the A6/ Bedford Road, Rushden; and
- EN33: Rushden East Sustainable Urban Extension.

8.26 Policy EN33 provides additional policy criteria for managing delivery of the Rushden East SUE (already allocated through Joint Core Strategy Policy 33). This also allows for the incorporation of the Rushden East Masterplan Framework Document (MFD) into the Plan (Appendix 6<sup>16</sup>).

## **9.0 Regulation 19 Consultation: Pre-Submission Draft (publication version) LPP2 (February – March 2021)**

9.1 The Regulation 19 consultation for the Pre-Submission Draft LPP2 was run for 6 weeks; 5 February – 19 March 2021, inclusive.

9.2 **58 respondents** submitted approximately **240 representations** during the consultation. These relate to the following statutory requirements:

1. Legal compliance – [2012 Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#), as amended; [2004 Environmental Assessment Regulations; Conservation of Habitats and Species Regulations 2017](#); and/ or Human Rights/ equalities legislation
2. Compliance with the statutory Duty to Cooperate – [2011 Localism Act, Section 110](#); and/ or

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<sup>16</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/12131/appendix\\_6\\_-\\_rushden\\_east\\_sue\\_masterplan\\_framework\\_document](https://www.east-northamptonshire.gov.uk/downloads/file/12131/appendix_6_-_rushden_east_sue_masterplan_framework_document)

### 3. Soundness tests.

#### Soundness tests

- 9.3 The Local Plan is deemed 'sound' if it can be satisfactorily demonstrated that it meets the following tests:
1. **Positively prepared** – consistent with relevant strategic policies for the area [that is, the Local Plan Part 1; the [North Northamptonshire Joint Core Strategy 2011-2031](#), adopted July 2016];
  2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  3. **Effective** – deliverable over the plan period; and
  4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the [National Planning Policy Framework \(NPPF\)](#).
- 9.4 Representations were submitted on the basis of these soundness tests. The majority of representations related to the 2<sup>nd</sup> (Justified) and 3<sup>rd</sup> (Effective) tests. These will not be analysed and responded to by the Council. Instead, the Council will identify the key issues raised through the representations. These are summarised at Appendix 2 (below). The key issues will enable the appointed Planning Inspector to set an agenda for examination hearings, to be held later this year.
- 9.5 The consultation provided an opportunity for respondents to challenge any part of the LPP2 document, on the basis of legal compliance and/ or the soundness test. Several policies received no representation. Responses were concentrated around the following:
- Spatial development strategy (EN1);
  - Strategic Oundle and Rushden site specific allocations (EN24-EN28 and EN33);
  - Housing policies (EN29-EN32).
- 9.6 These were accompanied by a small number of proposed alternative/ omission sites. Further information regarding issues raised is set out at Appendix 2.

## 10.0 Conclusion

- 10.1 The Local Plan Part 2 has emerged over a four year period. There were many steps to getting the Plan ready for publication and submission to the Secretary of State. The key stages/ milestones are as follows:
- January – March 2017: Regulation 18 consultation (formal Plan launch) – statutory issues and options consultation stage;
  - May 2017 – April 2018: Stakeholder workshops – evidence gathering;
  - November 2018 – November 2020 – 1<sup>st</sup> draft Plan and focused changes (additional site allocations) consultations;
  - February – March 2021: Regulation 19 consultation (Pre-Submission Draft) – legal compliance/ soundness tests; and
  - March 2021: Submission of Plan to Secretary of State for Housing, Communities and Local Government.
- 10.2 This statement has been prepared in accordance with Regulation 22. It is a requirement of the Local Planning process, to ensure that the basic (legal) consultations have been undertaken, both the statutory requirements (Regulations) and Statement of Community Involvement (December 2013; updated September 2019).
- 10.3 At all stages the processes of consultation and engagement are considered to have gone above and beyond the Regulations and Statement of Community Involvement. The 1<sup>st</sup> draft Plan consultation (November 2018 – February 2019) allowed stakeholders to view a full draft version of the Plan. This was followed by further focused changes consultations during 2020, regarding additional site allocations that it was determined should be incorporated into the Local Plan Part 2 in response to representations received during the 1<sup>st</sup> Draft Plan consultation.
- 10.4 It is emphasised that the development of the Plan has been an extensive process, involving three main stages of public consultation and ongoing dialogue with key agencies and adjoining authorities. The development of the plan needs to be considered in the context of the North Northamptonshire JCS which forms the strategic Part 1 of the Local Plan. Whilst strategic issues in relation to the Duty to Cooperate were considered and satisfied during the preparation of the North Northamptonshire JCS, proactive, ongoing dialogue has been maintained with key agencies and adjoining authorities.
- 10.5 One criticism of past approaches to consultation (e.g. Preferred Options) has been that these have sometimes been inaccessible and difficult to understand for the wider public. In order to overcome this, the 1<sup>st</sup> Draft Plan was prepared during summer/ autumn 2018 to provide a preview as to how the Plan would look once finalised. It allowed the framework to be set and enabled clarity as to how the subsequent focused changes (2020) would be incorporated into the Plan document.
- 10.6 It is considered that the extensive work undertaken in the development of the LPP2 has addressed and responded to the key issues raised through the consultations, and facilitated the development of a robust, sound plan in compliance with the JCS (Local Plan Part 1). The establishment of an extensive evidence base, which has recognised the work undertaken for the JCS and where additional local evidence was required, including consideration of relevant reasonable alternatives through Sustainability

Appraisal, has reflected the need to respond and test in more detail the issues that have been identified through consultation.

- 10.7 The Plan was approved for Regulation 19 (Pre-Submission Draft) consultation by the Planning Policy Committee on 27 January 2021 (Item 5). This included the Schedule of Proposed Changes (Appendix 5), which explains how the changes agreed following the 1<sup>st</sup> Draft Plan consultation (November 2018 – February 2019) have informed the Pre-Submission Draft version of the Plan. It sets out in detail how consultation responses to the emerging Plan and refinements to technical work informed the Pre-Submission version LPP2, including refinements to policies to address relevant issues raised.
- 10.8 The Pre-Submission version LPP2 (Regulation 19) consultation generated a number of objections, with a smaller number of supporting representations. The main issues raised at this stage were mostly similar to those raised at previous stages of consultation e.g. spatial development strategy, challenges to the housing delivery trajectories and the site assessment/ selection process. The summary of responses to the Pre-Submission version LPP2 at Appendix 2 set out the Council's interpretation and understanding of these issues, which will be taken forward and expanded on through the Examination process.

## 11.0 Glossary of abbreviations

<b>Term</b>	<b>Definition</b>
<b>EiP</b>	Examination in Public (headed by a Planning Inspector, following submission of the Plan to the Secretary of State)
<b>ENC</b>	East Northamptonshire Council
<b>LPP2</b>	Local Plan Part 2
<b>JCS</b>	(North Northamptonshire) Joint Core Strategy
<b>NASS</b>	Northamptonshire Adult Social Services
<b>NNJPC</b>	North Northamptonshire Joint Planning Committee
<b>OCA</b>	Oxford-Cambridge Arc
<b>RNOTP</b>	Rural North, Oundle and Thrapston Plan (current LPP2; to be replaced)
<b>SA</b>	Sustainability Appraisal
<b>SCI</b>	Statement of Community Involvement
<b>SEA</b>	Strategic Environmental Assessment
<b>SEN</b>	Special Educational Needs

## Appendix 1: Regulation 18 consultation

A1.1. *Appendix 1 provides full details of the statutory consultation requirements for the Local Plan Part 2. With reference to the requirements of Regulation 22(1)(c)(i) to (iv), it systematically describes:*

- i. which bodies and persons the local planning authority invited to make representations under regulation 18,*
- ii. how those bodies and persons were invited to make representations under regulation 18,*
- iii. a summary of the main issues raised by the representations made pursuant to regulation 18,*
- iv. how any representations made pursuant to regulation 18 have been taken into account;*

### **Introduction**

A1.2. *The Council published the Regulation 18 consultation document for the Local Plan Part 2 on 27<sup>th</sup> January 2017, under the 2012 Town and Country Planning (Local Planning) (England) Regulations, as amended. The Plan was subject to 6 weeks of consultation; closing date 13<sup>th</sup> March 2017. Schedule 1 of this Appendix (below) lists the following:*

- Specific consultation bodies (statutory consultees) that were consulted and details of those stages to which these bodies have responded*
- Town/ Parish Councils and Parish Meetings (where responses have been received); and*
- Types of other consultation bodies (non-statutory consultees) and details of those stages to which any such bodies have responded.*

A1.3. *Schedule 1 does not specify individual landowners and/ or residents where these have responded. Landowners are only listed where these are not individuals (e.g. limited companies) or where they are represented by a developer and/ or land agent. This is due to the requirements of the 2018 Data Protection Act, which require that individuals/ members of the public should no longer be named in planning consultations.*

A1.4. *45 respondents to the Regulation 18 consultation raised 489 separate comments. A precis of the main issues raised in Plan order was reported to the Planning Policy Committee on 3<sup>rd</sup> April 2017. Feedback from the Regulation 18 consultation was taken into account in the next stage of Plan preparation; a series of stakeholder workshops that were held over 12 months, between May 2017 and April 2018.*

### **Who was consulted under Regulation 18 and how that was undertaken?**

A1.5. *Upon publication, a formal notification letter or email was sent to the relevant specific consultation bodies (Regulation 2<sup>17</sup>) to invite them to make representations on the consultation documents<sup>18</sup>. Consultation documents were made available on the Council's website and available at public libraries and the Council offices (Thrapston, Oundle and Rushden Customer Service Centres).*

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<sup>17</sup> <https://www.legislation.gov.uk/uksi/2012/767/part/1>

<sup>18</sup> <https://www.east-northamptonshire.gov.uk/localplan2>

A1.6. *All specific consultation bodies listed in the Planning Policy consultation database were informed directly of the consultation, by way of email. Comments were submitted via email or using the bespoke consultation form. Verbatim comments were then copied into a standard Excel format, which was then incorporated into a report for the Planning Policy Committee on 3 April 2017 ([Item 5, Appendix 2](#)).. For the purposes of the Duty to Cooperate the following are Specific or Statutory bodies who were consulted as part of the scoping stage and throughout the LPP2 process:*

- *Environment Agency*
- *Historic England*
- *Natural England*
- *Civil Aviation Authority*
- *Homes and Communities Agency (now Homes England)*
- *National Health Service (NHS) England*
- *NHS Clinical Commissioning Groups (CCGs)*
- *Network Rail*
- *Transport Authority*
- *Highways England*
- *Northamptonshire Enterprise Partnership (now South East Midlands Local Enterprise Partnership)*
- *Northamptonshire County Council*
- *River Nene Regional Park*
- *Ministry for Housing, Communities and Local Government*
- *Equality and Human Rights Commission*
- *East Midlands Councils*
- *Adjoining local authorities (County Councils, Borough/ District Councils, Town/ Parish Councils and Parish Meetings)*
- *Private Sector Utility providers*
- *National Grid*

A1.7. *The main issues raised through the Regulation consultation and how the comments should be addressed, were considered by officers after the close of the consultation (13<sup>th</sup> March 2017). Comprehensive details of this feedback (verbatim representations, a summary of the issues raised and details of other consultation events that were undertaken during the consultation) are set out in the report to the Planning Policy Committee (3<sup>rd</sup> April 2017, Item 5) and summarised at Schedule 2 (below).*

A1.8. *These issues informed the series of Stakeholder Workshops (May 2017 – April 2018) that followed the Regulation 18 consultation. These workshop events were held with elected representatives – Members of East Northamptonshire Councils, and Town/ Parish Councils, to consider and set the themes, topics and proposals that ought to be covered by the Local Plan Part 2.*

## **Conclusion**

A1.9. *The Regulation 18 consultation generated a significant quantum of interest (nearly 500 representations from 45 respondents; further information is set out Schedule 1, below). This was utilised to inform the scope of subsequent stakeholder workshops and the 1<sup>st</sup> Draft Plan. It is considered that fulfils the requirements of Regulation 22(1)(c) (i) to (iv) and the Statement of Community Involvement (2013; updated 2019).*

## Schedule 1: Details of the consultation database (bodies, groups, members of the public etc)

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, January – March 2017	Draft Plan consultations (November 2018 –February 2019; February – March 2020; October – November 2020)	Regulation 19 Pre-Submission version LPP2 consultation, February – March 2021
<b>Specific consultation bodies (statutory consultees) –</b> <i>those we have to consult to meet the statutory requirements, including adjoining councils and agencies such as the Environment Agency, Heritage England, Highways England and utility providers</i>			
<b>Government Departments/ National bodies:</b>			
Department for Education		✓	
MOD (Defence Infrastructure Organisation)			✓
Environment Agency	✓	✓	
Historic England	✓	✓	✓
Natural England	✓	✓	✓
Network Rail			
Highways England		✓	
Sport England	✓	✓	✓
<b>Local authorities, Town/ Parish Councils (including Parish Meetings) and policing body in or adjoining the planning authority area:</b>			
Apethorpe Parish Meeting	✓	✓	
Bedford Borough Council	✓	✓	
Chelveston cum Caldecott Parish Council	✓	✓	✓
Corby Borough Council	✓	✓	
Cotterstock Parish Meeting			✓
East Northamptonshire Council Councillors		✓	✓
East Northamptonshire Council Building Control		✓	
East Northamptonshire Council Development Management		✓	

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, January – March 2017	Draft Plan consultations (November 2018 –February 2019; February – March 2020; October – November 2020)	Regulation 19 Pre-Submission version LPP2 consultation, February – March 2021
East Northamptonshire Council Economic and Commercial Development		✓	
East Northamptonshire Council Housing Strategy/ Policy Sub-Committee	✓	✓	
Elton Parish Council		✓	
Glaphorn Parish Council		✓	✓
Grafton Underwood Parish Council		✓	
Gretton Parish Council		✓	
Hargrave Parish Council	✓		
Higham Ferrers Town Council	✓	✓	✓
Huntingdonshire District Council		✓	✓
Irthlingborough Town Council		✓	
Lilford cum Wigsthorpe, Thorpe Achurch Parish Council		✓	
Little Addington Parish Council	✓		
Melchbourne & Yelden Parish Council	✓		
Nassington Parish Council		✓	
Northampton Borough Council		✓	
Northamptonshire County Council (Archaeology)	✓		
Northamptonshire County Council (Development Management/ Education/ Infrastructure and Funding)		✓	✓
Northamptonshire County Council (Highway Authority)		✓	
Northamptonshire County Council (LLFA)	✓		
Northamptonshire County Council (NIA)	✓		
Northamptonshire County Council (Property)	✓		
Northamptonshire County Council (Transport)		✓	

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, January – March 2017	Draft Plan consultations (November 2018 –February 2019; February – March 2020; October – November 2020)	Regulation 19 Pre-Submission version LPP2 consultation, February – March 2021
North Northamptonshire Joint Planning and Delivery Unit	✓	✓	
Oundle Town Council		✓	✓
Pilton, Stoke Doyle and Wadenhoe Parish Council		✓	✓
Raunds Town Council		✓	
Ringstead Parish Council	✓		
Rushden Town Council		✓	✓
Rutland County Council			✓
South Kesteven District Council			✓
Stanwick Parish Council	✓		
Thrapston Town Council		✓	
Woodford Parish Council	✓	✓	
Fire and Rescue services (Northamptonshire County Council)		✓	
Northamptonshire Police		✓	
<i>Communication operators/facility owners (e.g. Mobile Operators Association)</i>			
<i>Utilities (Electricity, gas, sewerage and water companies):</i>			
Anglian Water	✓	✓	✓
BPA – Total Fina Pipeline		✓	
Cadent Gas		✓	
CLH Pipeline System Ltd	✓	✓	✓
National Grid		✓	✓
Homes England (formerly Homes and Communities Agency)			
Northamptonshire County Council (Public Health)	✓	✓	
Northamptonshire Adult Social Services (NASS)		✓	
The National Health Service (NHS England and Clinical Commissioning Groups)			

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, January – March 2017	Draft Plan consultations (November 2018 –February 2019; February – March 2020; October – November 2020)	Regulation 19 Pre-Submission version LPP2 consultation, February – March 2021
South East Midlands Local Enterprise Partnership (SEMLEP)			
Civil Aviation Authority/ General Aviation Awareness Council			
<i>Neighbourhood Planning Groups/ Forums (where not represented by statutory Qualifying Body)</i>			
<b>General Consultation Bodies (non-statutory consultees) –</b> <i>those who have expressed a desire to be involved such as agents, developers and landowners, societies, charities and special interest groups, national groups and local business groups, hard to reach groups and members of the public</i>			
<i>Voluntary/ community/local charitable bodies:</i>			
AFC Rushden and Diamonds		✓	
British Horse Society			✓
Council for the Preservation of Rural England (CPRE)		✓	✓
East Rushden Residents Association (ERRA)		✓	
Higham Ferrers NPSG			✓
National Trust	✓	✓	✓
Northamptonshire Gardens Trust		✓	✓
North Northants Badger Group	✓		
The Wildlife Trust		✓	✓
Transition Oundle		✓	
<i>Bodies which represent the interests of the elderly</i>			
<i>Local schools:</i>			
Ferrers School	✓		
The Corporation of Oundle School (Berrys)			✓
<i>Bodies representing racial, ethnic or</i>			

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, January – March 2017	Draft Plan consultations (November 2018 –February 2019; February – March 2020; October – November 2020)	Regulation 19 Pre-Submission version LPP2 consultation, February – March 2021
<i>national groups</i>			
<i>Bodies representing the interests of different religious groups:</i>			
Church and Community Planning Partnership (CCPP)		✓	
Peterborough Diocesan Board/ IM Properties			✓
Rushden and Higham Council of Churches		✓	
<i>Bodies representing disabled persons</i>			
<i>Bodies representing Gypsies, travellers and travelling show people</i>			
<i>Bodies representing business in the area; e.g. Chambers of Commerce:</i>			
Dodson & Horrell	✓		
KFC	✓		
Sainsbury's Supermarkets Ltd	✓		
Soniflex		✓	
West Street Nurseries Ltd		✓	
Whitworths	✓		
Woodley Holdings		✓	
<i>Landowners and developers with interests in the authority's area as well as agents that may represent these:</i>			
Amberville Properties Ltd	✓		
Ashfield Land Development Ltd (Pegasus)			✓
Augustus Allebone Settlement	✓		
Barratt Developments & Taylor Wimpey		✓	✓
Balfour Beatty Investments Ltd		✓	
Bellway Homes/ Marrons		✓	✓
Bidwells		✓	
Biggin & Benefield Estate		✓	
Blatherwycke Estate	✓		

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, January – March 2017	Draft Plan consultations (November 2018 –February 2019; February – March 2020; October – November 2020)	Regulation 19 Pre-Submission version LPP2 consultation, February – March 2021
Bowbridge Land Ltd	✓		
Brigstock Developments Ltd	✓		
Burghley House Preservation Trust and Hollins Strategic Land LLP	✓		
Carr Farmer (Northants) Ltd	✓		
Catesby Estates	✓	✓	
CC Town Planning			✓
Conalgen Enterprises SA		✓	
Conant Discretionary Settlement	✓		
Countryside Properties		✓	✓
Crown Estate/ QUOD		✓	✓
Davidsons Developments Ltd	✓	✓	
Davies and Co	✓		
Drayton Estate		✓	
Duddington Estate	✓		
Federal Estates		✓	
Francis Jackson Homes	✓		✓
Gladman Developments Ltd	✓	✓	✓
Hallam Land Management Ltd			✓
Henry H Bletsoe & Son LLP	✓	✓	
Hollins Strategic Land		✓	
Home Builders Federation		✓	✓
Howard Farms Ltd	✓		
Individual landowners	✓		
Investment Land International	✓		
J D Davies & Partners	✓		
J L Wilson Trust	✓		
John Martin Associates	✓		

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, January – March 2017	Draft Plan consultations (November 2018 –February 2019; February – March 2020; October – November 2020)	Regulation 19 Pre-Submission version LPP2 consultation, February – March 2021
Kier Ventures Ltd		✓	
Lagan Homes (Foxbury)		✓	✓
Landscape Land and Property Ltd	✓		
Linden Homes Strategic Land		✓	
Living Land	✓		
Lone Star Land Ltd			✓
Lourett Developments		✓	
LXB	✓	✓	
Montagu Evans LLP		✓	
OHL	✓		
Oundle Feoffees/ David Wilson Homes	✓	✓	
Pegasus Planning		✓	
Persimmon Homes	✓	✓	✓
Rayner Estate	✓	✓	
Retirement Housing Consortium			✓
Rock UK		✓	
Roebuck Land and Planning Ltd			✓
Rula Homes (ID Planning)			✓
Silverbee Developments Ltd	✓		
Smith Jenkins		✓	
Society of Merchant Venturers	✓	✓	
TOWN			✓
Vistry Homes Ltd (Bidwells)		✓	
William Davis Ltd			✓
<i>Individuals (residents and individual landowners)</i>	✓	✓	✓

## **Schedule 2: Details of the consultation methods undertaken (letters, press releases, etc)**

### **Regulation 18 consultation – approaches to engagement**

A1.10. *The Planning Policy team also engaged with a range of internal stakeholders, in the run-up to and during the Regulation 18 consultation. This was undertaken in the form of the following workshops:*

- **20 January 2017** – Preliminary Problem Solving Team Building (PSTB) internal (officer) stakeholder workshop (prior to the Regulation 18 consultation);
- **21 February 2017** – Statutory consultees workshop – Environment Agency and Natural England;
- **2 March 2017** – ENC councillors workshop.

A1.11. *The PSTB was supported by an “ideas” board (in place, **January – December 2017**), where development management colleagues were invited to post ideas and thoughts regarding themes or topics where more detailed policy direction through the LPP2 would be desirable and helpful to decision making. Summary feedback from these consultation workshops was reported to the Planning Policy Committee on 3<sup>rd</sup> April 2017 (Item 5, section 2.0), alongside full details of representations received.*

A1.12. *The Regulation 18 consultation itself was supported by a series of 34 consultation questions. These were designed to help shape the structure of the LPP2, and the topics and themes that it would eventually need to cover.*

### **Summary of main issues identified through the Regulation 18 consultation**

A1.13. *The Council received nearly 500 representations from 45 respondents. These related to the following matters (i.e. consultation questions):*

- Consultation process
- Overall strategy (Q1-Q5)
- Historic and built environment (Q6-Q8)
- Open space and green infrastructure (Q9-Q14)
- Housing (Q15-Q17)
- Town centres and retailing (Q18-Q21)
- Employment areas (Q22-Q23)
- Culture and community facilities (Q24-Q26)
- Site specific allocations (Q27-Q32)
- Evidence base (Q33-Q34)

A1.14. *In many cases views of respondents were divided; e.g. in the need for the Plan to set out a more detailed Vision and Outcomes compared to that already defined by the JCS (Local Plan Part 1). Similarly, views were divided regarding the need for a more detailed settlement hierarchy as a tool to define the spatial development strategy for rural areas (i.e. village categorisation).*

A1.15. *Other representations emphasised a need to make provision for specialist housing, or more detailed policy directions regarding housing mix and tenure. The need for further development land allocations was also considered; e.g. smaller (non-strategic)*

*employment land allocations. Critically, the consultation considered where additional housing land allocations would be required and the quantum of additional housing land that would be needed to ensure that a deliverable housing land supply could be maintained.*

A1.16. *Statutory consultation bodies have raised a variety of issues. The Environment Agency has highlighted the need to maintain water quality; e.g. by way of ecosystem services. Similarly, Natural England has highlighted the importance of trees. Historic England stated that policy criteria for development should reflect NPPF terminology, with reference to historic assets. Many respondents have also highlighted recent publications (evidence base, guidance documents or strategies) that should be given regard in the preparation of the LPP2.*

A1.17. *With reference to site specific proposals, Historic England and the Environment Agency have considered the role of the emerging Rushden East Masterplan in defining further policy requirements for Rushden East. Corby Borough Council has reiterated previous concerns regarding the Tresham Garden Village scheme, with reference to the impact upon the setting of historic assets, the strategic highway network and Weldon village.*

### **PSTB “ideas” board**

A1.18. *The “ideas” board allowed Development Management and other colleagues within East Northamptonshire to identify any themes or topics that it was felt desirable to be included in the LPP2. It was in place throughout 2017, and colleagues were invited to set down ideas, including where possible:*

- *What*
- *How*
- *Spatial coverage*
- *Why*

A1.19. *Colleagues identified several themes or topics where additional policy direction was deemed desirable. These included innovative design ideas; e.g. zero carbon technologies, cultural infrastructure. Officers felt that more detailed design policy criteria, over and above the criteria set out in JCS Policy 8 would be helpful. Similarly, further direction regarding developments around the periphery of settlements was also deemed desirable. Finally, a need for further policy direction regarding specialist housing (older persons/ multi-generational) housing was also emphasised.*

### **How the main issues raised through the Regulation 18 consultation and “ideas” board were addressed**

A1.20. *The Regulation 18 consultation workshops (January – March 2017) represented the first stage in complying with the Duty to Cooperate. The Statutory consultees workshop (21 February 2017) enabled representatives of the Environment Agency and Natural England (representatives from Historic England were unable to make the date) to put forward ideas and concepts that could be considered in the LPP2.*

A1.21. *Officers from the North Northamptonshire local planning authorities (Corby, East Northamptonshire, Kettering and Wellingborough) meet monthly, to review plan-making issues with potential implications for the Duty to Cooperate. This is supplemented by six-monthly meetings of Northamptonshire Planning Policy officers, with respect to broader*

*issues affecting Northamptonshire as a whole, Daventry District, Northampton Borough and South Northamptonshire District. Further Duty to Cooperate meetings have been held with other neighbouring local authorities (Rutland, South Kesteven, Peterborough, Huntingdonshire and Bedford), to discuss cross-boundary issues affecting these areas.*

*A1.22. The council used the feedback from the Regulation 18 consultation to inform the development of issues and options. Responses also set out the areas of the evidence base that needed to be updated or new evidence commissioned.*

*A1.23. Similarly, the “ideas” board has identified a number of issues where additional LPP2 policy guidance would be desirable; e.g. specialist housing, air quality, design. These have been considered in determining the scope of the LPP2; that is, what additional policies are/ are not needed.*

*A1.24. In relation to the five year housing land supply, this underpins the LPP2 and is reviewed annually. A report is prepared each autumn, setting out the Council’s current five year housing land supply position, for the previous 1 April base date. This is then utilised for the Authorities Monitoring Report housing land supply position ([Joint Planning and Delivery Unit](#)).*

## Appendix 2: Regulation 19 (Pre-Submission Draft version Local Plan Part 2) consultation

A2.1. **58 respondents** submitted approximately **240 representations** during the Regulation 19 consultation. In addition, three late representations were received (totalling **61 respondents**). These have been duly considered and are summarised below (at Schedule 1 to Appendix 2, below), in accordance with the requirements of Regulation 22(1)(c)(v):

- **Approximately 240<sup>19</sup> “duly made” representations** were made pursuant to Regulation 20; a summary of the main issues raised in those representations is set out at Table A to this Appendix, below; and
- 3 late representations were received, which are not “duly made” under Regulation 20, but which are nevertheless submitted alongside the LPP2 and may be considered at the discretion of the appointed Planning Inspector.

### Introduction

A2.2. The Council published the Local Plan Submission document for consultation on 5 February 2021, pursuant to Regulation 19 of the 2012 Town and Country Planning (Local Planning) (England) Regulations, as amended. The Plan was subject to 6 weeks of consultation, finishing on 19 March 2021.

A2.3. Approximately 240 separate comments were received; each regarded as a separate representation. A precis of the main issues raised in Plan order is contained in Section 3 of this Appendix. This includes the response of the Council.

### Who was consulted under Regulation 19 and how that was undertaken?

A2.4. Upon publication, a formal notification letter or email was sent directly to over 500 bodies (statutory and non-statutory consultees, and individuals who have expressed an interest), inviting them to make representations on the consultation document. This consisted of bodies included on the consultation list which was used for the Regulation 18 consultation, plus organisations and individuals who subsequently expressed an interest in the Local Plan and wished to be notified at subsequent stages of consultation. Copies of the representations are published online, on the Regulation 19 consultation web page<sup>20</sup>.

A2.5. Statutory consultation notices were published in the local press (three publications: Northants Telegraph; Stamford Mercury and Nene Valley News). Schedule 1 to Appendix 1 (3<sup>rd</sup>/ right hand column, above) specifies those consultees that responded to the Regulation 19 consultation. Further details are provided at Schedule 3, below.

A2.6. In accordance with the 2018 Data Protection Act, individuals who have responded to the consultation cannot be identified by name, although the issues raised are given due consideration in accordance with Regulation 20.

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<sup>19</sup> The number of separate representations or comments is quoted as an approximate figure. This is because the number may vary significantly, dependent upon the degree of disaggregation of multiple representations that have been submitted, particularly by email or letter.

<sup>20</sup> [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/14](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/14)

## **Processing representations following Regulation 19 consultation (March 2021)**

A2.7. Responses came in by way of Smart Survey and via email/ post in the following numbers:

- 28 respondents via Smart Survey;
- 27 respondents via email;
- 1 respondent via Royal Mail (response scanned and emailed); and
- 2 respondents via both Smart Survey and email.

A2.8. Responses received through Smart Survey were easy to process. Several respondents submitted several separate Smart Survey forms, each of which has been counted as a single representation. However, managing and processing responses submitted by email or post proved more complicated. This is because the majority of email responses contained multiple representations.

A2.9. A process of disaggregation was undertaken, in order to interpret single responses containing multiple representations. In many instances this has proved straightforward; where respondents had clearly differentiated between different policies and/ or sections of the Plan. However, in other cases differentiation between representations is less clear and has required individual officer judgements; e.g. where omission sites have been proposed these have been counted as a single representation, even where multiple arguments have been put forward in support of a single alternative site.

A2.10. For representations submitted by Smart Survey, the online form was set up to direct respondents to take particular pathways to ensure a representation has been correctly made; i.e. with references to legal requirements and/ or the tests of soundness. **89 individual representations** (separate comments) were submitted via Smart Survey.

A2.11. For email/ Royal Mail responses, these were each manually processed. In many cases responses were more detailed than those submitted via Smart Survey. An initial process of disaggregation identified a total of **127 representations** (53 in support/ 74 objections). A further/ more detailed process of disaggregation identified approximately **150 separate comments/ representations** submitted by email and Royal Mail. In combination with those representations submitted via Smart Survey gives a revised figure of approximately **240 representations**.

## **Schedule 1: Summary issues received – main issues raised in Plan order**

A2.12. *Below is a list of the responses/main issues raised by the Regulation 19 consultation. This is organised by Local Plan Chapter including comments on key evidence where relevant (e.g. SA/ SEA/ HRA etc). The Council has not considered there is any need for further modification to the proposed submission Plan (other than minor editorial changes or factual corrections), so no schedule of proposed modification has been prepared.*

A2.13. *Main issues arising from the Regulation 19 representations (5 February – 19 March 2021) are highlighted below. This relates to objections raised through representations. Supporting representations are considered as “read”:*

- *Duly made objections should reference the relevant legal or soundness test;*
- *Representations stating, “we support xx policy, but feel that it could be improved by...” are considered to be objections;*
- *Responses having no comments to make are considered to be supporting representations.*

A2.14. *Issues raised are set out below in order of the Plan, starting with generic or overarching comments regarding the LPP2 as a whole or matters such as the consultation process. These are then attributed to individual policies, in Plan order. Omission/ alternative sites are also noted where these have been put forward.*

### **Wider Plan (“whole Plan” issues)**

- *Fig 5 imbalance between the different Local plan outcomes*
- *Fig 6 urban area of Rushden be extended to be consistent with Rushden Neighbourhood Plan*
- *Sustainability Appraisal and site allocation assessments should be clearly referenced to acknowledge heritage impact assessment*
- *The approach to employment growth is not based on up to date evidence, not an appropriate strategy as should provide for greater employment growth*
- *Table 5 makes no reference to conservation villages and restraint villages could be widened to include Pilton and Wadenhoe*
- *Chapter 8 ‘Housing Delivery’ & Chapter 9 ‘Delivering Sustainable Urban Extensions’ – the Council’s approach to deliver the housing shortfall in Irthlingborough in other settlements and reliance on housing at Irthlingborough West is objected to. The allocation of Nene Park for residential uses is required to address the housing shortfall in Irthlingborough*
- *Alternative options to those set out in Policy EN33 and the MFD have not been tested through the sustainability appraisal process*
- *It would be prudent to have regard to the LHN standard methodology figure against which housing land supply will be measured*
- *request for clarification regarding the housing allocations proposed within the 3km zone of influence (for identifying recreational disturbance impacts) around the Upper Nene Valley Gravel Pits SPA.*
- *HRA should use the conservation objectives as main point of reference*

- *HRA it is not clear whether the strategy can accommodate additional growth proposals within the Plan*
- *HRA assumes that strategic issues are only to be dealt with in combination rather than by individual policies*

### **Omission sites**

- *Land east of Addington Rd, Irthlingborough, a saved policy and current planning application, contributor to housing land supply*
- *Land north of Benefield Road, Oundle – site previously promoted through Oundle Neighbourhood Plan*
- *Land south of Herne Road, Oundle – site previously promoted through Oundle Neighbourhood Plan*
- *Nene Valley Farm, Rushden (Rushden Gateway), allocated for employment in JCS (Policy 35) should be revised to allow for housing as well as employment to reflect the greater need for housing*
- *The land at Slater’s Lodge, Rushden/Higham should be incorporated into Policy EN33 to ensure consistency with JCS Policy 33*
- *Land at Stamford Rd, Easton on the Hill further consideration should be given to the needs of larger villages in respect of sustainability*
- *Land at Denford Rd, Ringstead further consideration should be given to the needs of larger villages in respect of sustainability*
- *Land at Chelveston Rd, Raunds considered as a better alternative to land proposed east of A6/Bedford Rd*

### **Introduction; Area Portrait; Vision and Outcomes (section 1.0-2.0)**

- *No specific representations received or issues raised*

### **Vision and Outcomes (section 3.0)**

- *No specific mitigation measures cited in relation to outcomes*

### **Policy EN1 Spatial Development Strategy**

- *Policy is not sound, and inconsistent with national planning policy.*
- *“Development beyond the extent of the current built up areas will be resisted” is not positively framed and rules out where development beyond village confines may be needed.*
- *Restraint villages should be increased to include further settlements*
- *Amend to identify towns such as Irthlingborough as a focus for further development to meet need locally arising from development needs*
- *Further consideration should be given to the housing needs of large villages, recognising the sustainability of new housing in such locations to address local need and maintain/develop services/infrastructure*
- *An approach which disperses growth to market towns would be more effective in addressing housing land supply in areas such as Raunds*

### **Policies EN2-EN5 Settlement boundary criteria**

- *Application of criteria questioned*
- *EN5 fails to acknowledge any circumstances where market and affordable housing development may jointly be required to support the delivery of a community-led development proposal on the edge of a suitably sustainable settlement.*
- *Loosening of settlement boundaries not justified*

**Policy EN6 Replacement dwellings in the open countryside**

- *No specific representations received or issues raised*

**Policy EN7 Green Infrastructure corridors**

- *Policy requires access through school grounds*
- *Policy is inconsistent with JCS Policy 19 re protection*
- *Implementation needs to be clearer*

**Policy EN8 The Greenway**

- *Implementation needs to be clearer*
- *Greenway must protect/enhance heritage assets/settings*

**Policy EN9 Designation of Local Green Space**

- *Designation should support heritage protection*
- *Designation is excluded in villages that do not prepare neighbourhood plans*

**Policy EN10 Enhancement and provision of open space**

- *Clarification needed where on/ off site contributions are required*
- *Clarification re what is meant by insufficient access to existing open space*

**Policy EN11 Enhancement and provision of sport and recreation facilities**

- *Table 9 of the PPS re current and future deficits in provision is not up to date and robust in accordance with NPPF paragraph 96*
- *The PPS only considers future demand up to 2021/ fails to identify quantitative or qualitative deficits or surpluses and opportunities for new provision for the whole plan period*
- *Query consistency of requiring employment to contribute to playing fields*

**Policy EN12 Health and Wellbeing**

- *Support for the inclusion of Active Design Guide; Building for a Healthy Life and Healthy Streets in relation to the good practice for health and wellbeing.*
- *Unclear what is acceptable in terms of a healthy community under the preparation of a HIA, which provides uncertainty to the applicant/decision-maker*

**Policy EN13 Design of buildings/extensions**

- *Need to consider implications of light pollution*
- *Criterion h unnecessary due to proposed amendments to Building Regulations*

**Policy EN14 Designated Heritage Assets**

- *Strengthen policy in relation to harm*

**Policy EN15 Non-Designated Heritage Assets**

- *Approach to managing loss of non-designated heritage assets inconsistent with NPPF para 184*

**Policy EN16 Tourism, cultural developments and tourist accommodation**

- *Proposed addition to criteria relating to historic environment/ tourism proposals to consider potential impacts on designated/ non-designated heritage assets*
- *There is no indication how Upper Nene Valley Gravel Pits SPA will be considered to ensure tourism growth will be compatible and ensure no adverse effect on the integrity of the SPA*

**Policy EN17 Land south of Chelveston Road, Higham Ferrers**

- *As plan policies are intended to be read as a whole it is not necessary to duplicate all requirements in this site-specific policy.*

**Policy EN18 Commercial space to support economic growth**

- *There is no indication how Upper Nene Valley Gravel Pits SPA will be considered to ensure business start-up and growth will be compatible and ensure no adverse effect on the integrity of the Upper Nene Valley Gravel Pits SPA*

**Policy EN19 Protected Employment Areas**

- *Unclear as to how the Employment Land Review assessment has informed the selection of individual sites*
- *Oundle Marina proposal would coalesce with Barnwell*
- *Detailed policy rewording required, to include definition of “a reduction in the level of employment”*
- *Additional criterion proposed to allow the potential redevelopment of Nene Park to include residential development subject to compliance with other policies*

**Policy EN20 Relocation and/or expansion of existing businesses**

- *There is no indication how Upper Nene Valley Gravel Pits SPA will be considered to ensure Relocation and/or Expansion of Existing Businesses will be compatible and ensure no adverse effect on the integrity of the Upper Nene Valley Gravel Pits SPA.*

**Policy EN21 Town centres and primary shopping frontages**

- *No specific representations received or issues raised*

**Policy EN22 Impact test thresholds for retail development**

- *Policy should allow for “an increase” in retail development*

**Policy EN23 Development of main town centre uses around the local centres**

- *No specific representations received or issues raised*

**Policy EN24 Oundle housing allocations**

- *Concern that localism has not been considered in respect of site selection; e.g. no consideration given to Glapthorn Neighbourhood Plan*
- *Question whether sufficient land allocated to meet requirements; e.g. saved Rural North, Oundle and Thrapston Plan sites should not count towards housing land supply*
- *Justification for 300 dwellings residual requirement; e.g. sufficient land already committed at Cotterstock Road/ St Christopher’s Drive (total 260 units), therefore not necessary to allocate land off Stoke Doyle Road*
- *Need to update monitoring data to 1 April 2021*
- *The specific site allocations proposed are not justified; e.g. concerns re methodology, site selection scorings and how alternative sites have been considered/ assessed*
- *Evidence base not appropriate/ robust; e.g. approaches to contacting promoters/ landowners*
- *No further housing developments should be permitted in Oundle until the expiration of the current plan*
- *Plan not clear that part of the Cotterstock Road site lies outside Oundle and falls within the parish of Glapthorn*
- *Provide clarity that St Christopher’s Dr allocation preferred option is to deliver 130-unit affordable extra care scheme and market housing*

**Policy EN25 Land rear of Cemetery, Stoke Doyle Road, Oundle**

- *Lack of evidence for suitability/ deliverability*
- *Concerns that separate landowners will not agree to a comprehensive site development*
- *Site access has not satisfactorily been demonstrated*
- *Site specific constraints; e.g. highways implications of Warren Bridge (heritage asset)*
- *Better, more deliverable sites available in Oundle*
- *Criterion a) be removed*
- *Criterion b) remove reference to 5% custom and self-build*

**Policy EN26 Cotterstock Road/St Peter’s Road, Oundle**

- *Minerals and Waste Local Plan (2017) protects Cotterstock Road site – should remain undeveloped.*
- *Impact on Oundle Sewage treatment Works seriously underestimated*

- *The site allocations override the wishes of local people and ignore viable alternatives.*
- *Building on brownfield sites in the town will reduce some wildlife habitat but the effect of building on larger areas of land, close to open countryside, is known to be far more destructive.*
- *The structural landscaping will be sufficient to mitigate any adverse impacts from Oundle WRC. Residential and high amenity areas/ private gardens should not be located in areas regularly exposed to odour emissions.*
- *Anglian Water request that policy be amended to specify how a suitable distance will be maintained to ensure the occupiers of the site will not be adversely affected.*
- *Local Plan policies are intended to be read as a whole/ it is not necessary to duplicate requirements in site-specific policy.*
- *Development of this site would be intrusive, at odds with Glapthorn Neighbourhood Plan*
- *Substantial over-delivery within Glapthorn Parish – impacts upon village services, facilities and coalescence*

### **Policy EN27 St Christopher's Drive, Oundle**

- *The allocation does not address issues such as noise from adjacent A605/ distance to town centre.*
- *Site access inadequate*
- *There is an existing sewage pumping station within the boundary of the allocation site - the site layout should be designed to take this account*
- *Provide clarity that St Christopher's Drive allocation preferred option is to deliver 130-unit affordable extra care scheme and market housing*
- *Questions re deliverability of extra care element of scheme*

### **Policy EN28 Land east of the A6/Bedford Road, Rushden**

- *This site together with Rushden East SUE would be expected to drain to Broadholme Water Recycling Centre (WRC) - there is not sufficient headroom available at Broadholme WRC to serve this housing together with Rushden East SUE.*
- *Site allocation supported which provides flexibility to meeting future housing requirements*
- *Supporting evidence submitted by promoters – vision, assessments (heritage, ecology, transport, drainage)*
- *Site allocation should be extended to include land to the south-east*
- *The proposed approach to introduce an additional strategic direction for growth at Rushden is beyond the remit of the Part 2 plan*
- *There is no policy basis for restricting the consideration of sites only to Rushden*
- *Allocating a single, strategic site to address the current shortfall in housing land will not help fully address the council's housing supply and risk compromising the delivery of existing planned growth especially at Rushden East*

### **Policy EN29 Delivering wheelchair accessible housing**

- *General approach supported, but need for sufficient flexibility within policy*

- *Need for policy requirement is not evidenced*

### **Policy EN30 Housing mix and tenure to meet local need**

- *General approach supported, but need for sufficient flexibility within policy*

### **Policy EN31 Older people's housing provision**

- *Recognise JCS/ NPPF support to meeting need for specialist housing; e.g. wider benefits such as regeneration of High Streets/ town centres*
- *Policy emphasis – overall insufficient encouragement/ support for older peoples housing – plan should be more proactive in supporting this*
- *Need greater emphasis on delivery through smaller developments (<0.5ha) which provide greater opportunity than relying solely on allocated sites*
- *Need to recognise viability for private older people's housing*
- *Need to recognise individual/ site specific circumstances in delivering older people's housing – need for sufficient flexibility*
- *Object to the % definition of larger sites that are required to contribute towards the provision of housing for older persons*

### **Policy EN32 Self and custom build housing**

- *Use of local definition – separation of self (criterion (a)) and custom (criterion (b)) build – these separate criteria questioned, unclear what LPAs expectations are*
- *Clarity requested on level of self/ custom build shortfall*
- *Reference needs to be made to the provision of community led housing*
- *Unclear if 5% refers to market housing only or includes affordable housing*
- *Suitable locations need definition*
- *Spatial approach does not reflect locational demand*
- *Some supporting evidence base is dated (e.g. 2015 SHMA) – insufficient justification for policy obligations*
- *Thresholds provide excessive burdens; e.g. options for up to 10 dwellings to reflect local demand, local eligibility criteria, 50 dwellings (5%)*
- *Impacts of policy obligations on delivery rates; e.g. proposed that cascade method should be reduced to 6 months*
- *JCS (policies 14 and 30) already provides adequate policy for promoting self and custom housebuilding*
- *Evidence required to demonstrate that the % requirement for self and custom build represents a justified approach*

### **Policy EN33 Rushden East Sustainable Urban Extension**

- *Policy is not consistent with JCS Policy 33 and Higham Ferrers Neighbourhood Plan*
- *Welcome additional detail including uses/ quantum and infrastructure in this policy and MFD.*
- *Uncertainty in when the SUE will deliver housing completions, therefore emphasis should focus on delivering additional smaller sites for development or provide reserve sites*

- *Does not take into account government's standard methodology for housing, figures are out of date.*
- *Alternative options to those set out in Policy EN33 and the MFD have not been tested through the sustainability appraisal process*
- *The RE site boundary should have considered the inclusion of all available land within the broad area of search set out in JCS Policy 33, the extent of the site boundary is not justified*
- *The land at Slaters Lodge should be incorporated within the policy proposals*

**Policy EN34 Reimagining Town Centres – guiding principles**

- *Rail station required to connect London/ Bedford/ Wellingborough.*

**Policy EN35 Splash Pool and Wilkinson site redevelopment, Rushden**

- *Re-development of town centre supported – but include food court/ McDonalds or other fast food chains and authentic food providers.*
- *Object to the suggestion of a built facilities strategy to inform future opportunities for the relocation of the Splash Pool Leisure site*
- *This policy does not provide a firm commitment for the replacement of leisure provision/ nor has a suitable site been identified to ensure that the provision is located in the right location - in line with NPPF paragraph 97b/ the loss of the leisure provision has not been justified.*

**Policy EN36 Former factory site, between 71 Oakley Road and 37-51 Washbrook Road, Rushden**

- *No specific representations received or issues raised*

**Policy EN37 Rectory Business Centre, Rushden**

- *Site layout should be designed to take existing foul sewer into account.*

**Policy EN38 Federal Estates/former Textile Bonding factory site, Newton Road/Midland Road, Higham Ferrers**

- *As the Local plan policies are intended to be read as a whole it is not necessary to duplicate these requirements in this site-specific policy.*

**Policy EN39 Former Select & Save 13-21 High Street/St peter's Way car park, Irthlingborough**

- *No specific representations received or issues raised*

**Policy EN40 Former Rushden and Diamonds FC stadium site, Nene Park, Diamond Way, Irthlingborough**

- *Loss of the Former Rushden and Diamonds FC Stadium site would need to be mitigated, unless it can be demonstrated that the stadium site is surplus to requirements, in accordance with NPPF paragraph 97*

- *The requirement for the mitigation is not contained within the policy and therefore this should be amended accordingly - this is a principal requirement for the release of the site for development*
- *Policy be amended to allow residential development, subject to works being undertaken allow the site to be re-designated as flood zone 1*
- *The site is located adjacent to the SPA and it would be would expected that a site specific HRA to assess all potential impacts is undertaken*

**Policy EN41 Riverside Hotel, Station Road, Oundle**

- *No specific representations received or issues raised*

**Policy EN42 Cattle Market, Market Road, Thrapston**

- *No specific representations received or issues raised*

**Monitoring and Implementation**

- *The monitoring framework should include indicators relating to the delivery of key elements of the Rushden East SUE*

**Policies Map**

- *Expectation that designated sites; e.g. national nature reserves, open space, ancient woodland be identified on the maps*

**Paragraphs**

- *5.11, 5.15, 6.10 Need to recognise inclusion of equestrian activity*
- *8.6/ Table 22 – delivery rates for larger sites questioned; e.g. Rushden/ Irthlingborough trajectories need to increase by 470 dwellings to ensure delivery*
- *8.8, 8.11 Land east of Addington Rd, Irthlingborough should remain as an allocated site in the emerging Local Plan*
- *10.60 – seek retention of Oundle long stay car park (East Road/ Nene Business Park)*

**Appendices**

**Appendix 6 Rushden East MFD**

- *MFD does not recognise different roles of Higham and Rushden (Market and Growth Towns)*
- *Policies designed to protect the heritage of Higham are not recognised by the Local Plan.*
- *Local solution needs to be found for improving services in Higham, not just through the creation of Rushden East.*

- *MFD not consistent with Higham Ferrers Neighbourhood Plan*
- *MFD does not provide a well-connected and integrated development*
- *Representations to the MFD have not been fully considered or properly acknowledged*
- *Location of the employment area is not justified*
- *Need for a separate cemetery for Higham residents within Higham parish*
- *Further details required as to what primary health care facilities will be provided*
- *The policy status of Appendix 6 is unclear*
- *A number of specific policy requirements contained within the MFD should be brought into the wording of Policy EN33*
- *No clear evidence for restricting the size of B8 units*

## **Conclusion**

A2.15. *The Plan preparation process has been a continuous process of engagement throughout, since the launch of the Regulation 18 consultation (January 2017). This was undertaken in line with the 2013 Statement of Community Involvement (SCI), while consultations undertaken since autumn 2019 have been undertaken in accordance with the updated SCI (September 2019).*

A2.16. *The process culminated in the Pre-Submission Draft LPP2 consultation. Representations have been received and processed in accordance with the requirements of Regulation 22(1)(c)(v) and 2019 SCI. These will be submitted to the Secretary of State along with the Plan and supporting documents. The Secretary of State will then appoint a Planning Inspector, who will use representations received through the Regulation 19 consultation to inform the Examination in Public, which will take place later during 2021.*

A2.17. *Schedule 2 to Appendix 2 (below) provides further details about the consultation process; i.e. how the consultation process was undertaken.*

## **Schedule 2: Details of the consultation methods undertaken (letters, press releases, etc)**

A2.18. *Consultation for the Pre-Submission Draft LPP2 (Regulation 19) was undertaken in line with the statutory requirements for this procedural consultation. This has been guided by the 2012 Local Planning Regulations, SCI and 2020 Covid-19 Regulations.*

A2.19.A **Smart Survey** questionnaire was set up to assist the consultation process. This was open from 5 February – 19 March 2021, inclusive. The following consultation methods were also used to engage all stakeholders:

- *The public were made aware of the consultation using a variety of media including the Council's website and tweets from the council's Twitter account. Full details of the consultation are set out in the relevant web page.*
- *Consultation with all relevant consultees on the Local Plan database via email. This included: Town/ Parish Councils; neighbouring authorities; national and local groups / organisations, agents / landowners and other parties who have expressed an interest during the Plan preparation process since 2017.*
- *Statutory Regulation 19 notices were placed in the following local newspapers: Nene Valley News (6 February 2021<sup>21</sup>); Northants Telegraph (4 February 2021), and Stamford Mercury (4 February 2021).*
- *Press release – the Council prepared a bespoke press release, which was available via the Council website and intranet pages (for internal staff), and sent to the local press<sup>22</sup>.*
- *In accordance with Covid-19 regulations, consultation documents were only available to view at the Council's Cedar Drive (Thrapston) and Rushden Centre offices by appointment. Libraries and the Oundle Customer Service Centre were closed throughout the consultation period.*
- *Feedback consultation forms were printed, containing information about the consultation and how people could get involved. These were available to download, alongside the Smart Survey form on the council's website.*

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<sup>21</sup> <https://nenevalleynews.co.uk/e-version/>

<sup>22</sup> [https://www.east-northamptonshire.gov.uk/news/article/1202/final\\_consultation\\_stage\\_for\\_east\\_northamptonshire\\_s\\_local\\_plan](https://www.east-northamptonshire.gov.uk/news/article/1202/final_consultation_stage_for_east_northamptonshire_s_local_plan)



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