

Addendum to Statement of Consultation under Regulation 22

Responses to key issues summarized in the Regulation 22 Statement

July 2021

In response to requests from the Inspector, the Council has produced the following:

- A disaggregated spreadsheet of representations (by policy/ paragraph number and representor order)
- Initial responses to the main issues identified through the representations; and
- Provided a link from each individual disaggregated representation, to the original published representation.

An initial appraisal of representations revealed that around 240 separate representations were received; as noted at paragraphs 4.52, 9.2 and Appendix 2 of the Statement of Consultation under Regulation 22 (Regulation 22 statement)¹. More systematic disaggregation, in response to the Inspector's requests, revealed that **347 separate representations** were received; with each given a unique reference number in the "Responses" spreadsheets.

Disaggregated spreadsheets containing representations and the Council's response to each are published by section (i.e. policy/ paragraph number)² and representor³ order. Individual representations are published in full and are available to download from the Local Plan Examination web page⁴.

In response to the Inspector's request for the Council to provide brief responses to the main issues it has identified, the Council has prepared a brief response to each of the summary points raised in Appendix 2, Schedule 1 of the Regulation 22 statement. These responses are set out in the Annex below. This addendum document should be read in conjunction with the Regulation 22 statement⁵. It updates this (Schedule 1, Appendix 2), in response to the Inspector's requests.

¹ https://www.east-northamptonshire.gov.uk/downloads/file/12226/statement_of_consultation_under_regulation_22

² https://www.east-northamptonshire.gov.uk/downloads/file/12354/regulation_19_representations_by_section

³ https://www.east-northamptonshire.gov.uk/downloads/file/12353/regulation_19_representations_by_representor

⁴ https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/15

⁵ https://www.east-northamptonshire.gov.uk/downloads/file/12226/statement_of_consultation_under_regulation_22

Annex: East Northamptonshire Local Plan Part 2 – Statement of Consultation under Regulation 22
Appendix 2, Schedule 1 – Council responses to main issues raised through Regulation 19 consultation

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|----------------|--|--|---|---|--|
| 1 | 1.37-1.42 | | Sustainability Appraisal and site allocation assessments should be clearly referenced to acknowledge heritage impact assessment | SA includes assessment of heritage impacts as integral to the process | No change |
| 1 | 1.43-1.48 | | HRA should use the conservation objectives as main point of reference | HRA process has been undertaken by appointed consultant, in conjunction with Natural England. The process has been undertaken to ensure that the resultant report is sufficiently robust. | No change |
| 1 | 1.43-1.48 | | HRA - not clear whether the strategy can accommodate additional growth proposals within the Plan | Noted. The Council has sought to maintain continuous dialogue with Natural England, in accordance with the Duty to Cooperate. Therefore, further consideration will need to be given to Natural England's representations, which have broader implications for the Plan as a whole and (potentially) the emerging review of the Joint Core Strategy/ Local Plan Part 1. The Council will continue this dialogue during the Examination, in order to address these concerns. | Possible changes to the Plan in response to Natural England's comments are under consideration |

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|----------------|--|--|--|---|--|
| 1 | 1.43-1.48 | | HRA assumes that strategic issues are only to be dealt with in combination rather than by individual policies | Noted. The Council has sought to maintain continuous dialogue with Natural England, in accordance with the Duty to Cooperate. Therefore, further consideration will need to be given to Natural England's representations, which have broader implications for the Plan as a whole and (potentially) the emerging review of the Joint Core Strategy/ Local Plan Part 1. The Council will continue this dialogue during the Examination, in order to address these concerns. | Possible changes to the Plan in response to Natural England's comments are under consideration |
| 1 | Policies map | | Expectation that designated sites; e.g. national nature reserves, open space, ancient woodland be identified on the maps | Secondary data regarding national/ statutory designations is available through other sources and is often changing/ being updated. The Policies Map for the Local Plan Part 2 focuses upon showing spatial information regarding policies in the Plan itself. | No change |
| 3 | Figure 5 | | Imbalance between the different Local plan outcomes | Plan outcomes replicated from "parent" Joint Core Strategy/ Local Plan Part 1 | No change |
| 4 | Figure 6 | | Urban area of Rushden be extended to be consistent with Rushden Neighbourhood Plan | Diagrammatic depiction of existing urban area - more detailed policy designations (e.g. NDP settlement boundaries) shown on adopted Policies Map | No change |

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|---------|--|--------------------------------|---|---|------------------|
| 4 | Table 5 | | No reference to conservation villages and restraint villages could be widened to include Pilton and Wadenhoe | Designating Restraint Villages is intended to be an exception. Ashton was designated as such due to its historic character (of national importance). Neighbourhood Planning allows for local restraint policies to be set (e.g. Wakerley), so future Neighbourhood Plans could designate individual settlements as restraint villages in appropriate local circumstances. | No change |
| 4 | | EN1 | Policy is not sound, and inconsistent with national planning policy | Issues of consistency with national policy will be assessed through the EiP. EN1, which sets additional local detail to supplement adopted JCS Policy 11, is considered to be accord with this adopted strategic Local Plan policy (likewise the NPPF). | No change |
| 4 | | EN1 | “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 | Policy EN1 sets out the overall spatial strategy/ approach to managing development. Details about how development will be managed in practice are set out in the settlement boundary policies (EN2-EN5). | No change |

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| 4 | | EN1 | Restraint villages should be increased to include further settlements | Policy EN1 sets out the overall spatial strategy/ approach to managing development. Designating Restraint Villages is intended to be an exception. Ashton was designated as such due to its historic character (of national importance). Neighbourhood Planning allows for local restraint policies to be set (e.g. Wakerley), so future Neighbourhood Plans could designate individual settlements as restraint villages in appropriate local circumstances. | No change |
| 4 | | EN1 | Amend to identify towns such as Irthlingborough as a focus for further development to meet need locally arising from development needs | The overarching spatial strategy (for urban areas) is already set by JCS Policy 11/ Table 1. This sets the spatial strategy for Irthlingborough; also reflected in Policy EN1(1)(b). Setting an alternative strategy for growth for individual towns should be undertaken through the JCS Review/ new North Northamptonshire Strategic Plan. | No change |
| 4 | | EN1 | 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 | Policy EN1(2) already differentiates between the eight large villages and other freestanding villages. Any further moves to promote development in large villages (compared to others) could risk conflict with/ undermining the adopted spatial strategy (JCS Policy 11). Neighbourhood Plans provide an opportunity for local communities to promote additional growth in individual villages. | No change |

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| 4 | | EN1 | An approach which disperses growth to market towns would be more effective in addressing housing land supply in areas such as Raunds | The overarching spatial strategy (for urban areas) is already set by JCS Policy 11/ Table 1. This sets the spatial strategy for Raunds; also reflected in Policy EN1(1)(b). Setting an alternative strategy for growth for individual towns should be undertaken through the JCS Review/ new North Northamptonshire Strategic Plan. | No change |
| 4 | | EN2-EN5 | Application of criteria questioned | Settlement boundary criteria have been set to provide an unambiguous but sufficiently flexible tool for managing development at the periphery of settlements. They also provide direction for Neighbourhood Planning, to allow for Neighbourhood Plans to designate linear settlement boundaries if this is the preferred approach locally. | No change |
| 4 | | EN2-EN5 | 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 | Proposals that fall beyond the current extent of built up areas (as defined by settlement boundary criteria) would be assessed in accordance with JCS policies 13 and 25, with additional detail set out in Policy EN5 | No change |
| 4 | | EN2-EN5 | Loosening of settlement boundaries not justified | Settlement boundary policies do not propose "loosening" of settlement boundaries. Instead, these provide certainty and clarity for managing development at the periphery of settlements, while allowing for sufficient flexibility in development management. | No change |

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| 5 | | EN7 | Policy requires access through school grounds | The detailed routes shown originated from the 2015 Oundle Cycle Network Study (Oundle Town Council/ Sustrans). This proposes a blueprint for a network of circular cycle routes around the town and its environs. Implementation requires collaboration and agreement between the Council and affected landowners. The routes shown represent a conceptual layout, rather than a definitive illustration of the proposed network. | No change |
| 5 | | EN7 | Policy is inconsistent with JCS Policy 19 re protection | It is unclear as to how EN7 does not accord with JCS Policy 19. Policy 19(c) specifically recognises that green infrastructure has a range of functions and can deliver a number of benefits/ gains, "particularly those that improve access between the towns and their surrounding countryside". It is considered that the Greenway network proposals are wholly compliant with this criterion. | No change |
| 5 | | EN7 | Implementation needs to be clearer | The Greenway Plan proposes a blueprint for a network of circular cycle routes across the northern part of the Plan area (focused upon Rockingham Forest and the Nene Valley). Implementation requires collaboration and agreement between the Council and affected landowners. The routes shown represent a conceptual layout, rather than a definitive illustration of the proposed network. | No change |

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| 5 | | EN8 | Implementation needs to be clearer | The Greenway Plan proposes a blueprint for a network of circular cycle routes across the northern part of the Plan area (focused upon Rockingham Forest and the Nene Valley). Implementation requires collaboration and agreement between the Council and affected landowners. The routes shown represent a conceptual layout, rather than a definitive illustration of the proposed network. | No change |
| 5 | | EN8 | Greenway must protect/ enhance heritage assets/ settings | Planning applications relating to the development of the Greenway will be dealt with in accordance with the Local Plan as a whole. Proposals would need to meet the overarching principles of sustainable development (JCS Policy 1) and historic environment policies (including JCS Policy 2 and Local Plan Part 2 policies EN14 and/ or EN15). | No change |
| 5 | | EN9 | Designation should support heritage protection | Policy EN9 and NPPF criteria for Local Green Spaces (LGS) already highlights archaeological or historic interest as a specific LGS criterion. LGS designation may be appropriate to for protecting significant heritage assets. | No change |
| 5 | | EN9 | Designation is excluded in villages that do not prepare neighbourhood plans | LGS designation is specifically a non-strategic policy. It is all about protecting locally significant open spaces with value to that community/ locality. It is emphasised that the best mechanism by which LGS should be designated is therefore a Neighbourhood Plan, rather than the Local Plan. The Local Plan Part 2 approach gives a direct incentive to Town/ Parish Councils to undertake Neighbourhood Planning. | No change |

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| 5 | | EN10 | Clarification needed where on/off site contributions are required | Noted. Policy EN10 has been drafted with reference to the KKP assessment. This advises that: "A development should make appropriate provision of services, facilities and infrastructure to meet its own needs. Where sufficient capacity does not exist the development should contribute what is necessary, either on-site or by making a financial contribution towards provision elsewhere." This implies that exact details of open space provision should be determined on a case by case basis; reflected within EN10. | No change |
| 5 | | EN10 | Clarification re what is meant by insufficient access to existing open space | Noted. Policy EN10 has been drafted with reference to the KKP assessment. This advises that: "A development should make appropriate provision of services, facilities and infrastructure to meet its own needs. Where sufficient capacity does not exist the development should contribute what is necessary, either on-site or by making a financial contribution towards provision elsewhere." This implies that exact details of open space provision should be determined on a case by case basis; reflected within EN10. | No change |
| 5 | Table 9 | EN11 | 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 | Table 9 sets out the latest available/ published data. The KKP study was a significantly detailed and expansive survey, mostly undertaken during 2016 with the purpose of informing the new Plan, which the Council approved for preparation in April 2016. A review/ update to the Open Space/ Playing Pitches strategy would significantly delay preparation of the Local Plan. | No change |

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| 5 | | EN11 | 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 | Table 9 sets out the latest available/ published data. The KKP study was a significantly detailed and expansive survey, mostly undertaken during 2016 with the purpose of informing the new Plan, which the Council approved for preparation in April 2016. A review/ update to the Open Space/ Playing Pitches strategy would significantly delay preparation of the Local Plan. | No change |
| 5 | | EN11 | Query consistency of requiring employment to contribute to playing fields | Policy EN11 relates exclusively to major strategic housing and employment development sites, as defined by the JCS. Open space contributions are negotiable on the basis of need and development viability. EN11 allows for contributions to be sought relating to strategic scale employment developments (5ha+), where these could be developed as ancillary facilities to support major/ large scale new schemes. | No change |

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| 5 | 5.11, 5.15, 6.10 | | Need to recognise inclusion of equestrian activity | The Greenway is predominantly intended for use by walkers and cyclists. However, it is recognised that the routes have a secondary function for equestrian uses, with horse riders welcome where the route is a bridleway (Phase 5 and 6): https://www.east-northamptonshire.gov.uk/info/200096/tourism_and_travel/786/walking_and_cycling_routes_in_east_northamptonshire . Equestrian activity is implicitly recognised as delivering health and wellbeing benefits, and more explicit references could be made to this within the plan, accordingly. | Potential addition of equestrian references in paragraphs 5.15/ 6.10, to reference horse riding, for those parts of the Greenway routes that are a bridleway |
| 6 | | EN12 | 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 | Noted. The Local Plan has been written to provide a resource, providing links to associated plans, policies and programmes. | No change |
| 6 | | EN12 | 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 EN12 explains how Health Impact Assessments (HIAs) will be applied in development management, with reference to health and wellbeing. The policy itself and supporting text include links to relevant toolkits and more detailed guidance as to how HIAs should be prepared and used to inform proposals. | No change |
| 6 | | EN13 | Need to consider implications of light pollution | Specific criterion (i) addresses the issue of light pollution | No change |

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| 6 | | EN13 | Criterion h unnecessary due to proposed amendments to Building Regulations | Potential future changes to the Building Regulations may well render criterion (h) redundant. However, until these are in place criterion (h) provides an opportunity to negotiate the provision of electric vehicle charging points through the planning system. | No change |
| 6 | | EN14 | Strengthen policy in relation to harm | Designated heritage assets (scheduled monuments, listed buildings etc) are already protected by robust separate legislation and national policy (NPPF), which are backed by EN14. The policy reflects paragraphs 193 – 196 of the NPPF, providing additional local direction. The predominant role of EN14 is to provide a direct Local Plan policy "hook" for determining proposals with potential impacts upon designated heritage assets. | No change |
| 6 | | EN15 | Approach to managing loss of non-designated heritage assets inconsistent with NPPF para 184 | NPPF para 184 provides the overarching strategy for conserving the historic environment, highlighting the importance of heritage assets in terms of their contribution to the quality of life for existing and future generations. Policy EN15 provides the relevant policy hook for protecting non-designated heritage assets and allowing for the preparation of local lists (e.g. through Neighbourhood Plans), but it is unclear how this does not accord with para 184. | No change |

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| 6 | | EN16 | Proposed addition to criteria relating to historic environment/ tourism proposals to consider potential impacts on designated/ non-designated heritage assets | Designated heritage assets (scheduled monuments, listed buildings etc) are already protected by robust separate legislation and national policy (NPPF), which are backed by EN14. This, together with Policy EN15 (Non-designated heritage assets) provide the relevant policy framework for managing developments affecting heritage assets. Proposals should be considered with reference to development plan policies, as a whole. | No change |
| 6 | | EN16 | 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 | Noted. The Council has sought to maintain continuous dialogue with Natural England, in accordance with the Duty to Cooperate. Therefore, further consideration will need to be given to Natural England's representations, which have broader implications for the Plan as a whole and (potentially) the emerging review of the Joint Core Strategy/ Local Plan Part 1. The Council will continue this dialogue during the Examination, in order to address these concerns. | Possible changes to the Plan in response to Natural England's comments are under consideration |
| 6 | | EN17 | 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 EN17 was developed since its first draft iteration (Focused Changes consultation, February - March 2021). The policy has evolved in accordance with the consultation feedback and discussions with the Department for Education (who are leading the new school project). | No change |

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| 7 | | | Approach to employment growth is not based on up to date evidence, not an appropriate strategy as should provide for greater employment growth | Employment growth (job Nos) is defined in JCS (Policy 23/ Table 3). Future employment growth will be defined by strategic plan/ JCS review. | No change |
| 7 | | EN18 | 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 | Noted. The Council has sought to maintain continuous dialogue with Natural England, in accordance with the Duty to Cooperate. Therefore, further consideration will need to be given to Natural England's representations, which have broader implications for the Plan as a whole and (potentially) the emerging review of the Joint Core Strategy/ Local Plan Part 1. The Council will continue this dialogue during the Examination, in order to address these concerns. | Possible changes to the Plan in response to Natural England's comments are under consideration |
| 7 | | EN19 | Unclear as to how the Employment Land Review assessment has informed the selection of individual sites | A detailed explanation of the site selection process for designation of Protected Employment Areas is set out in Background Paper 6: https://www.east-northamptonshire.gov.uk/downloads/file/12107/background_paper_6_-_protected_employment_areas This should be read in conjunction with the 2019 Aspi-nall Verdi Employment Land Review. | No change |

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| 7 | | EN19 | Oundle Marina proposal would coalesce with Barnwell | Oundle Marina is already an established employment area, with redevelopment proposals for the site already consented. The consented redevelopment would not bring the built up area of Oundle Marina any closer to Barnwell village than the existing buildings. | No change |
| 7 | | EN19 | Detailed policy rewording required, to include definition of "a reduction in the level of employment" | Noted. It is accepted that, there is insufficient clarity as to the measure for the "level of employment". Given that the JCS already measures the effectiveness of employment policies in terms of job Nos, it is accepted that this is the most appropriate measure. | Replace last sentence of introductory paragraph, as follows: "A reduction in net job numbers or development..." |
| 7 | | EN19 | Additional criterion proposed to allow the potential redevelopment of Nene Park to include residential development subject to compliance with other policies | Nene Park is an established employment area, albeit with parts of the site (former Rushden and Diamonds FC stadium site) currently vacant and under-used. The site remains (alongside the Whitworths factory) Irthlingborough's main economic hub and there is a desire to maintain the economic base in accordance with the Plan vision, for East Northamptonshire to be the heartland of small and medium sized enterprises, based on regenerated and thriving market towns. | No change |

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|---------|--|--------------------------------|---|---|--|
| 7 | | EN20 | 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. | Noted. The Council has sought to maintain continuous dialogue with Natural England, in accordance with the Duty to Cooperate. Therefore, further consideration will need to be given to Natural England's representations, which have broader implications for the Plan as a whole and (potentially) the emerging review of the Joint Core Strategy/ Local Plan Part 1. The Council will continue this dialogue during the Examination, in order to address these concerns. | Possible changes to the Plan in response to Natural England's comments are under consideration |
| 7 | | EN22 | Policy should allow for "an increase" in retail development | Policy EN22 seeks to ensure the retention of retail development within the designated town centres. It provides local thresholds for undertaking retail impact assessments for edge of centre, out of centre and out of town retail developments. It is about development management and does not preclude any increase in overall retail floorspace/ provision. | No change |
| 8 | Table 16 | | Would be prudent to have regard to the LHN standard methodology figure against which housing land supply will be measured | Housing Nos are defined in JCS (Policy 28/ Table 4). The Local Plan Part 2 is prepared within the framework set by the JCS; the LHN only comes into force from July 2021 (in practice for the 2021-22 monitoring period and beyond), so is not relevant at the time the Plan was submitted. Future growth (housing and jobs; with reference to LHN and Ox-Cambs Arc growth proposals) will be defined by strategic plan/ JCS review. | No change |

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| 8 | Table 15 | | 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 | Noted. The Council has sought to maintain continuous dialogue with Natural England, in accordance with the Duty to Cooperate. Therefore, further consideration will need to be given to Natural England's representations, which have broader implications for the Plan as a whole and (potentially) the emerging review of the Joint Core Strategy/ Local Plan Part 1. The Council will continue this dialogue during the Examination, in order to address these concerns. | Possible changes to the Plan in response to Natural England's comments are under consideration |
| 8 | 8.4 | | Omission sites | Site selection process is considered to be sufficiently robust and defensible. Alternative/ additional sites put forward by promoters were considered throughout the Plan making process and it is not considered that any of these is needed to accommodate current JCS growth requirements. | No change |
| 8 | | EN24 | Concern that localism has not been considered in respect of site selection; e.g. no consideration given to Glapthorn Neighbourhood Plan | The Glapthorn Neighbourhood Plan is listed in the index of supporting documents (policies/ evidence base) for the Plan. The Glapthorn Neighbourhood Plan considered potential development sites to the north of Oundle, including "Land off Cotterstock Road to St Peter's Road" and concluded for the latter that RNOTP paragraph 8.18, being a strategic policy of that development plan, should continue to apply. | No change |

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| 8 | | EN24 | 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 | Saved/ remaining RNOTP site allocations have a total 70 dwellings capacity. The submission Plan considers the implications of these and concludes that exclusion of these would equate to 246 dwellings residual requirement (paragraph 8.12); more than sufficiently met by the Plan allocations (EN25-EN27; 300 dwellings). | No change |
| 8 | | EN24 | 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 | The 300 dwellings residual requirement for Oundle was based on 2017 monitoring data, as explained at footnote 131 (submission Plan). This figure was accepted for both the Local Plan Part 2 and Oundle Neighbourhood Plan. Notwithstanding, the outstanding/ residual requirements are minima; a modest increase about these is accepted in accordance with the Government's objective of significantly boosting the supply of homes (NPPF paragraph 59). | No change |
| 8 | | EN24 | Need to update monitoring data to 1 April 2021 | The Plan is written on the basis of monitoring data for 1 April 2019. The updated (1 April 2020) data was submitted as part of the supporting evidence base and it is anticipated that the Plan would be updated in line with this or the 1 April 2021 data (if available) at the main modifications consultation stage (autumn 2021). | No change |

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| 8 | | EN24 | The specific site allocations proposed are not justified; e.g. concerns re methodology, site selection scorings and how alternative sites have been considered/ assessed | The site selection process was extensively considered during preparation of the 1st draft version of the Plan (summer/ autumn 2018), the 1st draft Plan consultation (extended to February 2019 to take account of the publication of additional evidence). This gave the promoters of alternative sites to put these forward and make the case for their deliverability. The site selection was supported by three separate site assessments (two of these by external consultants) to ensure that the evidence base provides sufficient justification for site selection. | No change |
| 8 | | EN24 | Evidence base not appropriate/ robust; e.g. approaches to contacting promoters/ landowners | The site selection process was extensively considered during preparation of the 1st draft version of the Plan (summer/ autumn 2018), the 1st draft Plan consultation (extended to February 2019 to take account of the publication of additional evidence). This gave the promoters of alternative sites to put these forward and make the case for their deliverability. The site selection was supported by three separate site assessments (two of these by external consultants) to ensure that the evidence base provides sufficient justification for site selection. | No change |
| 8 | | EN24 | No further housing developments should be permitted in Oundle until the expiration of the current plan | The Government's stated objective is to significantly boost the supply of homes (NPPF paragraph 59). Any attempt to impose any sort of moratorium on development (other than in exceptional and virtually unprecedented circumstances) would be contrary to national policy. | No change |

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| 8 | | EN24 | Plan not clear that part of the Cotterstock Road site lies outside Oundle and falls within the parish of Glapthorn | Land off Cotterstock Road to St Peter's Road (Policy EN25) is recognised as being situated partially within Glapthorn Parish area in the site assessment. While the site falls within Glapthorn Parish it is part of the Oundle urban area. This approach aligns to that of the Joint Core Strategy for Priors Hall (Weldon Parish), where the figures for Corby include 700 dwellings from the Sustainable Urban Extension that extends into East Northamptonshire Plan area (Policy 28/ Table 4/ side note 102). | No change |
| 8 | | EN24 | Provide clarity that St Christopher's Dr allocation preferred option is to deliver 130-unit affordable extra care scheme and market housing | The consented 130 dwellings scheme (19/01355/OUT) was approved in November 2020. This allows for a higher density development, to allow for the delivery of an extra care facility to meet local housing needs, in lieu of the standard affordable housing contribution. Policy EN27 is set at 100 dwellings, to cover the scenario that the negotiated extra care facility (negotiated with Persimmon Homes) is not delivered, but does not preclude additional conventional affordable units over and above the minimum requirement. | No change |

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|---------|--|--------------------------------|---|---|------------------|
| 8 | | EN25 | Lack of evidence for suitability/deliverability | Evidence for deliverability was a significant consideration for the site assessments. It is recognised that the site capacity is constrained by issues such as accessibility (e.g. Warren Bridge), which has implications for capacity. The principal landowner already has a partnership with David Wilson Homes for the majority of this site, while the land in separate ownership (west of Warren Bridge) already has permission in principle (reference 19/01827/PIP) for up to 9 dwellings. | No change |
| 8 | | EN25 | Concerns that separate landowners will not agree to a comprehensive site development | Policy EN25 contains a specific criterion (a), to ensure that a comprehensive development masterplan for the site can be agreed. Determination of any development proposals would be on the basis of criterion (a) being satisfactorily fulfilled. | No change |
| 8 | | EN25 | Site access has not satisfactorily been demonstrated | It is recognised that the site capacity is constrained by issues such as accessibility (e.g. Warren Bridge), which has implications for capacity. Policy EN25 recognises a need to provide suitable vehicular access, by way of upgrades to Stoke Doyle Road (criterion (c)). | No change |
| 8 | | EN25 | Site specific constraints; e.g. highways implications of Warren Bridge (heritage asset) | It is recognised that the site capacity is constrained by issues such as accessibility (e.g. Warren Bridge), which has implications for capacity. Policy EN25 recognises a need to provide suitable vehicular access, by way of upgrades to Stoke Doyle Road (criterion (c)). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|------------------|
| 8 | | EN25 | Better, more deliverable sites available in Oundle | The site selection process was extensively considered during preparation of the 1st draft version of the Plan (summer/ autumn 2018), the 1st draft Plan consultation (extended to February 2019 to take account of the publication of additional evidence). This gave the promoters of alternative sites to put these forward and make the case for their deliverability. The site selection was supported by three separate site assessments (two of these by external consultants) to ensure that the evidence base provides sufficient justification for site selection. | No change |
| 8 | | EN25 | Criterion a) be removed | Policy EN25 contains a specific criterion (a), to ensure that a comprehensive development masterplan for the site can be agreed. Determination of any development proposals would be on the basis of criterion (a) being satisfactorily fulfilled. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|---|
| 8 | | EN25 | Criterion b) remove reference to 5% custom and self-build | Criterion (b) reiterates the Local Plan policy requirement for 5% of plots to be made available for self and custom housebuilding. This reference repeats the Local Plan policy obligation at EN32, so does not necessarily need to be repeated in Policy EN25 [also EN26 and EN27]. | Remove relevant criteria: "...5% of plots should be made available as serviced building plots for self and/ or custom housebuilding" (policies EN25-EN27) |
| 8 | | EN26 | Minerals and Waste Local Plan (2017) protects Cotterstock Road site – should remain undeveloped | The site is situated within the sand and gravel (minerals) safeguarding area, designated through the Minerals and Waste Local Plan policy 28. However, this does not preclude development. Instead it requires that development of a significant nature (i.e. major developments) will have to demonstrate that the sterilisation of proven mineral resources of economic importance will not occur as a result of the development. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|------------------|
| 8 | | EN26 | Impact on Oundle Sewage treatment Works seriously underestimated | The impacts of odour from the sewage treatment works (to the north of the site) were extensively considered (and resolved) during the planning application stage (reference 19/01327/OUT). To support the application, an independent odour assessment of the impact of the proposed development on potential future residents was undertaken. | No change |
| 8 | | EN26 | The site allocations override the wishes of local people and ignore viable alternatives | The site selection process was extensively considered during preparation of the 1st draft version of the Plan (summer/ autumn 2018), the 1st draft Plan consultation (extended to February 2019 to take account of the publication of additional evidence). This gave the promoters of alternative sites to put these forward and make the case for their deliverability. The site selection was supported by three separate site assessments (two of these by external consultants) to ensure that the evidence base provides sufficient justification for site selection. | No change |
| 8 | | EN26 | 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 | There are no suitable brownfield sites within the existing Oundle urban area. The allocation of greenfield sites to deliver around 300 dwellings is necessary to ensure that the residual Local Plan requirement for the town can be delivered during the current Plan period (to 2031). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|------------------|
| 8 | | EN26 | 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. | The impacts of odour from the sewage treatment works (to the north of the site) were extensively considered (and resolved) during the planning application stage (reference 19/01327/OUT). To support the application, an independent odour assessment of the impact of the proposed development on potential future residents was undertaken. | No change |
| 8 | | EN26 | 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 | The impacts of odour from the sewage treatment works (to the north of the site) were extensively considered (and resolved) during the planning application stage (reference 19/01327/OUT). To support the application, an independent odour assessment of the impact of the proposed development on potential future residents was undertaken. | No change |
| 8 | | EN26 | Local Plan policies are intended to be read as a whole/ it is not necessary to duplicate requirements in site-specific policy | Noted. Instances of unnecessary repetition can be noted and recorded as potential minor changes, where necessary. | No change |
| 8 | | EN26 | Development of this site would be intrusive, at odds with Glapthorn Neighbourhood Plan | The Glapthorn Neighbourhood Plan is listed in the index of supporting documents (policies/ evidence base) for the Plan. The Glapthorn Neighbourhood Plan considered potential development sites to the north of Oundle, including "Land off Cotterstock Road to St Peter's Road" and concluded for the latter that RNOTP paragraph 8.18, being a strategic policy of that development plan, should continue to apply. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|------------------|
| 8 | | EN26 | Substantial over-delivery within Glapthorn Parish – impacts upon village services, facilities and coalescence | The Glapthorn Neighbourhood Plan is listed in the index of supporting documents (policies/ evidence base) for the Plan. The Glapthorn Neighbourhood Plan considered potential development sites to the north of Oundle, including “Land off Cotterstock Road to St Peter’s Road” and concluded for the latter that RNOTP paragraph 8.18, being a strategic policy of that development plan, should continue to apply. | No change |
| 8 | | EN27 | The allocation does not address issues such as noise from adjacent A605/ distance to town centre | The impacts of noise from the A605 Oundle Bypass (to the east of the site) were extensively considered (and resolved) during the planning application stage (reference 19/01355/OUT). The Planning Management Committee (24 June 2020) considered the effectiveness of the proposed noise barriers, where it was confirmed that 3m acoustic fencing would provide the most effective noise mitigation. | No change |
| 8 | | EN27 | Site access inadequate | Access arrangements and site layout were extensively considered (and resolved) during the planning application stage (reference 19/01355/OUT). The Planning Management Committee (24 June 2020) considered the effectiveness of the proposed noise barriers, where it was confirmed that the proposed access arrangements were suitable for the proposed level of development. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|--|------------------|
| 8 | | EN27 | There is an existing sewage pumping station within the boundary of the allocation site - the site layout should be designed to take this account | Existing development constraints were extensively considered (and resolved) during the planning application stage (reference 19/01355/OUT). The Planning Management Committee (24 June 2020) considered and resolved these matters. | No change |
| 8 | | EN27 | Provide clarity that St Christopher's Drive allocation preferred option is to deliver 130-unit affordable extra care scheme and market housing | The consented 130 dwellings scheme (19/01355/OUT) was approved in November 2020. This allows for a higher density development, to allow for the delivery of an extra care facility to meet local housing needs, in lieu of the standard affordable housing contribution. Policy EN27 is set at 100 dwellings, to cover the scenario that the negotiated extra care facility (negotiated with Persimmon Homes) is not delivered, but does not preclude additional conventional affordable units over and above the minimum requirement. | No change |
| 8 | | EN27 | Questions re deliverability of extra care element of scheme | The consented 130 dwellings scheme (19/01355/OUT) was approved in November 2020. This allows for a higher density development, to allow for the delivery of an extra care facility to meet local housing needs, in lieu of the standard affordable housing contribution. Policy EN27 is set at 100 dwellings, to cover the scenario that the negotiated extra care facility (negotiated with Persimmon Homes) is not delivered, but does not preclude additional conventional affordable units over and above the minimum requirement. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|---|------------------|
| 8 | | EN28 | 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 | Utilities capacity is a matter for resolution between the local planning authorities, developers and relevant utilities companies. Relevant partners (in the case, Anglian Water) will advise on specific mitigation measures to ensure that the development would be acceptable in planning terms. | No change |
| 8 | | EN28 | Site allocation supported which provides flexibility to meeting future housing requirements | Noted. Allocation of site will ensure that a deliverable housing land supply could be maintained for the remaining duration of the Plan period (to 2031). | No change |
| 8 | | EN28 | Supporting evidence submitted by promoters – vision, assessments (heritage, ecology, transport, drainage) | Noted. Information put forward during the Regulation 19 consultation provides further evidence of deliverability. | No change |
| 8 | | EN28 | Site allocation should be extended to include land to the south-east | The extent of the development area was considered during the Focused Changes consultation (October - November 2020). Expansion of the site allocation to the south east is not necessary to deliver the required magnitude of development and would entail taking up part of the current John While Golf driving range, which would entail the provision of a suitable replacement. | No change |
| 8 | | EN28 | The proposed approach to introduce an additional strategic direction for growth at Rushden is beyond the remit of the Part 2 plan | The proposed scale of development to the east of the A6 Bypass/ Bedford Road (up to 450 dwellings) is below the strategic threshold set by the Joint Core Strategy (500 dwellings; paragraph 9.14). Therefore, the proposal is within the current scope for the Local Plan Part 2. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|---|------------------|
| 8 | | EN28 | There is no policy basis for restricting the consideration of sites only to Rushden | The Joint Core Strategy (Table 1/ Policy 11/ paragraph 9.10) identifies the Growth Towns (including Rushden) as the focus for major co-ordinated regeneration and growth in employment, housing, retail and higher order facilities. Furthermore, the shortfall in provision relates to anticipated slippages in the delivery trajectories for the Rushden East and Irthlingborough West SUEs. In accordance with paragraph 9.10, additional housing provision would be appropriate where this meets a shortfall in deliverable sites at another settlement within the same Part 2 Local Plan area; i.e. Rushden and/ or Irthlingborough (with Rushden, the designated Growth Town as the priority location). | No change |
| 8 | | EN28 | 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 | The allocated site (450 dwellings) is of a sufficient magnitude to allow for delivery within the current Plan period; thereby ensuring that a deliverable housing land supply can be maintained. This is below the strategic threshold set by the Joint Core Strategy (500 dwellings; paragraph 9.14). Therefore, the proposal is within the current scope for the Local Plan Part 2. | No change |
| 8 | | EN29 | General approach supported, but need for sufficient flexibility within policy | The quantum of wheelchair accessible housing is negotiable, based upon both local needs and development viability. Category 3/ Building Regulations, Part M (wheelchair accessibility) is an optional standard, but Policy EN29 provides the basis for negotiating wheelchair accessible housing through the development management process. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|--|------------------|
| 8 | | EN29 | Need for policy requirement is not evidenced | The quantum of wheelchair accessible housing is negotiable, based upon both local needs and development viability. Category 3/ Building Regulations, Part M (wheelchair accessibility) is an optional standard, but Policy EN29 provides the basis for negotiating wheelchair accessible housing through the development management process. | No change |
| 8 | | EN30 | General approach supported, but need for sufficient flexibility within policy | The tenure, mixture and sizes of housing is negotiable through the development management system, based upon both local needs and development viability. Policy EN30 provides additional criteria to be considered for the Plan area, alongside Joint Core Strategy (Local Plan Part 1) Policy 30. | No change |
| 8 | | EN31 | Recognise JCS/ NPPF support to meeting need for specialist housing; e.g. wider benefits such as regeneration of High Streets/ town centres | Noted. The need to to increase specialist older people's housing provision is emphasised in the supporting text to Policy EN31 (including tables 19-20). | No change |
| 8 | | EN31 | Policy emphasis – overall insufficient encouragement/ support for older peoples housing – plan should be more proactive in supporting this | Policy EN31 focuses upon opportunities to deliver specialist older people's housing. It includes a focus upon extra care provision, for which a particular acute local need has been identified (particularly in the rural north, but throughout the Plan area). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|---|------------------|
| 8 | | EN31 | Need greater emphasis on delivery through smaller developments (<0.5ha) which provide greater opportunity than relying solely on allocated sites | Smaller sites may provide additional local opportunities to increase provision of new specialist/ older people's housing where a viable scheme is forthcoming. However, the focus upon allocated sites enables greater certainty regarding delivery, given that policy obligations are specifically written into individual site specific policies. | No change |
| 8 | | EN31 | Need to recognise viability for private older people's housing | All Local Plan policies have been subject to viability assessment: https://www.east-northamptonshire.gov.uk/downloads/file/11982/east_northamptonshire_local_plan_viability_assessment_bnp_paribas_july_2020 Specific proposals are negotiable in terms of individual viability considerations. | No change |
| 8 | | EN31 | Need to recognise individual/site specific circumstances in delivering older people's housing – need for sufficient flexibility | All Local Plan policies have been subject to viability assessment: https://www.east-northamptonshire.gov.uk/downloads/file/11982/east_northamptonshire_local_plan_viability_assessment_bnp_paribas_july_2020 . Specific proposals are negotiable in terms of individual viability considerations. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|---|------------------|
| 8 | | EN31 | Object to the % definition of larger sites that are required to contribute towards the provision of housing for older persons | The standards in Policy EN31 have been set with reference to the published evidence base (e.g. Northamptonshire Older People's study): https://www.northamptonshire.gov.uk/councilservices/adult-social-care/policies/Documents/Study%20of%20Housing%20and%20Support%20Needs%20of%20Older%20People%20Across%20Northamptonshire.pdf . The stated % is necessary to ensure that the larger (i.e. strategic) developments can deliver an appropriate mix of specialist housing, in line with local need. | No change |
| 8 | | EN32 | Use of local definition – separation of self (criterion (a)) and custom (criterion (b)) build – these separate criteria questioned, unclear what LPAs expectations are | The separation between individual self build and custom housebuilding is recognised through Policy EN32, given the differentiation between these two products (treated identically under the legislation). The policy recognises that volume housebuilders are best placed to deliver custom housebuilding on larger sites (50 dwellings +), while in nearly all cases self build is likely to be delivered by way of individual single dwelling projects. | No change |
| 8 | | EN32 | Clarity requested on level of self/ custom build shortfall | The Self and Custom Housebuilding background paper (BP11) includes an assessment/ forecast for overall demand during the remainder of the Plan period (to 2031). This calculates overall demand for self and custom housebuilding (335 dwellings; 2016-31), on the basis of Nos of expressions of interest, to 30 October 2019 (Appendix 1). It is considered that the background paper provides the necessary clarity. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|--|------------------|
| 8 | | EN32 | Reference needs to be made to the provision of community led housing | To date, expressions of interest by community/ self build groups on the Register have been minimal. Policy EN32 (alongside JCS Policy 30) allows for the delivery of community projects where these meet other policies within the Plan. It is anticipated, based on the latest data on the Register, that virtually all self and custom housebuilding would be delivered through individual self build projects, with demand topped up by way of custom building plots (the policy also allows for self build) provided as part of conventional market schemes. | No change |
| 8 | | EN32 | Unclear if 5% refers to market housing only or includes affordable housing | The 5% allows for volume housebuilders to make provision for individual/ custom housebuilding as part of the overall housing mix. It is anticipated that this would be provided through serviced plots, although the policy does not preclude providing a number of self and custom housebuilding provision of a number of self and custom housebuilding plots as part of the overall affordable housing contribution. | No change |
| 8 | | EN32 | Suitable locations need definition | Suitable locations are defined under Joint Core Strategy Policy. That is, proposals that accord with other relevant local plan policies. This is set out in the introductory policy text; i.e. suitable locations refers to where proposal comply with other spatial policies. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|--|------------------|
| 8 | | EN32 | Spatial approach does not reflect locational demand | The Self and Custom Housebuilding background paper (BP11) considered both the overall level of demand and spatial distribution. Oundle, Thrapston and Higham Ferrers (historic market towns) were identified as having the largest No of expressions of interest. As regards managing demand, the Joint Core Strategy already recognises Rushden East and Tresham Garden Village (south and north of the Plan area, respectively) as the key opportunities to provide serviced plots, while elsewhere single development plots provide the main opportunity of individual self builds. | No change |
| 8 | | EN32 | Some supporting evidence base is dated (e.g. 2015 SHMA) – insufficient justification for policy obligations | The 2018 Three Dragons Demand Assessment Framework provides the definitive assessment of demand. This is supported by bespoke ENC analysis in response to this, fully summarised in the background paper (BP11). The 5% threshold aligns to an apportioned self and custom housebuilding requirement over 20 years; i.e. 419(~420) dwellings over the Plan period (5% of 8400 dwellings Joint Core Strategy requirement). | No change |
| 8 | | EN32 | Thresholds provide excessive burdens; e.g. options for up to 10 dwellings to reflect local demand, local eligibility criteria, 50 dwellings (5%) | The tenure, mixture and sizes of housing (including self and custom housebuilding) is negotiable through the development management system, based upon both identified needs and development viability. Policy EN32 provides additional criteria to be considered for the Plan area, alongside Joint Core Strategy (Local Plan Part 1) Policy 30(g). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|------------------|
| 8 | | EN32 | Impacts of policy obligations on delivery rates; e.g. proposed that cascade method should be reduced to 6 months | Policy obligations are negotiable through the development management system, based upon both identified needs and development viability. Policy EN32 sets additional criteria to be considered for the Plan area, alongside Joint Core Strategy (Local Plan Part 1) Policy 30(g). The Council considered both 6 and 12 months periods and concluded that 12 months was necessary to ensure sufficient opportunities for interested parties to get self and custom housebuilding projects underway (Planning Policy Committee, 10 June 2019, Minute 30). | No change |
| 8 | | EN32 | JCS (policies 14 and 30) already provides adequate policy for promoting self and custom housebuilding | JCS policies 14 and 30 both support the principle of delivering an element of self and custom housebuilding on the major developments within the Plan area. These do not however, provide the necessary policy criteria to demonstrate compliance with legislative requirements (2015 and 2016 Acts), so it is necessary for the Part 2 Plan to provide sufficiently robust policy obligations to ensure compliance with the legislation. | No change |
| 8 | | EN32 | Evidence required to demonstrate that the % requirement for self and custom build represents a justified approach | The 2018 Three Dragons Demand Assessment Framework provides the definitive assessment of demand. This is supported by bespoke ENC analysis in response to this, fully summarised in the background paper (BP11). The 5% threshold aligns to an apportioned self and custom housebuilding requirement over 20 years; i.e. 419(~420) dwellings over the Plan period (5% of 8400 dwellings Joint Core Strategy requirement). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|--|------------------|
| 8 | 8.6/ Table 22 | | Delivery rates for larger sites questioned; e.g. Rushden/ Irthlingborough trajectories need to increase by 470 dwellings to ensure delivery | Delivery trajectories for larger sites/ SUEs are reviewed on an annual basis. The Plan is written on the basis of monitoring data for 1 April 2019. The updated (1 April 2020) data was submitted as part of the supporting evidence base and it is anticipated that the Plan would be updated in line with this or the 1 April 2021 data (if available) at the main modifications consultation stage (autumn 2021). Additional land at Rushden (Policy EN28) was allocated directly in response to slippages in the delivery trajectories for Rushden East/ Irthlingborough West. | No change |
| 8 | 8.8, 8.11 | | Land east of Addington Rd, Irthlingborough should remain as an allocated site in the emerging Local Plan | Outstanding Local Plan allocations at Oundle (2011 RNOTP - 70 dwellings) and Irthlingborough (1996 District Local Plan - 80 dwellings) are considered to form part of the current housing land supply (existing commitments). However, given the passage of time/ uncertainties regarding deliverability of these outstanding sites (including IR1-A), these are not specifically allocated. However, all of these sites are situated within the existing urban areas, so on this basis could come forward as windfall developments, in accordance with the adopted spatial development strategy (JCS policies 11 and 29). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|----------------|--|--|--|---|-------------------------|
| 9 | 9.1/ Table 22 | | Council's approach to deliver the housing shortfall in Irthlingborough in other settlements and reliance on housing at Irthlingborough West is objected to | The Joint Core Strategy (Table 1/ Policy 11/ paragraph 9.10) identifies the Growth Towns (including Rushden) as the focus for major co-ordinated regeneration and growth in employment, housing, retail and higher order facilities. Furthermore, the shortfall in provision relates to anticipated slippages in the delivery trajectories for the Rushden East and Irthlingborough West SUEs. In accordance with paragraph 9.10, additional housing provision would be appropriate where this meets a shortfall in deliverable sites at another settlement within the same Part 2 Local Plan area; i.e. Rushden and/ or Irthlingborough (with Rushden, the designated Growth Town as the priority location). | No change |
| 9 | | EN33 | Alternative options to Policy EN33/ MFD not tested through the sustainability appraisal process | Policy EN33 provides additional local detail to support the adopted JCS Policy 33. It allows for the site allocation boundary to be set and the MFD to be incorporated into the Local Plan. | No change |
| 9 | | EN33 | Policy is not consistent with JCS Policy 33 and Higham Ferrers Neighbourhood Plan | Policy EN33, as written, takes account of both JCS Policy 33 and Neighbourhood Plan Policy HF.H3. It is intended to provide additional specific detail to allow for the site boundary (extent of the development area) to be allocated and provide a policy "hook" to allow the Masterplan Framework Document (MFD) to be incorporated into the Local Plan Part 2 (Appendix 6). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|------------------|
| 9 | | EN33 | Welcome additional detail including uses/ quantum and infrastructure in this policy and MFD | Noted. Policy EN33 contains additional criteria, and should be considered in conjunction with JCS Policy 30, HFNP Policy HF.H3 and the MFD. | No change |
| 9 | | EN33 | Uncertainty in when the SUE will deliver housing completions, therefore emphasis should focus on delivering additional smaller sites for development or provide reserve sites | The latest anticipated delivery rates are set out in the 2020 Annual Position Statement, submitted with the supporting evidence base for the Local Plan Part 2 (G-02). This anticipates delivery of 1050 dwellings by 2031, compared to the JCS forecast (1600 dwellings). Accordingly, an additional site has been allocated (Policy EN28) for 450 dwellings, in order to address this slippage. | No change |
| 9 | | EN33 | Does not take into account government's standard methodology for housing, figures are out of date | The JCS requirement for the Plan area (420 dpa) remains in force until the passage of 5 years since adoption of that Plan (July 2016). From the 2021-22 monitoring period onwards (after the anticipated adoption date for the Local Plan Part 2), the housing requirements will be assessed against the standard methodology/ local housing needs (LHN) figures. | No change |
| 9 | | EN33 | Alternative options to those set out in Policy EN33 and the MFD have not been tested through the sustainability appraisal process | Policy EN33 and the MFD supplement the overarching criteria at JCS Policy 33. Policy EN33 contains additional criteria, and should be considered in conjunction with JCS Policy 30, HFNP Policy HF.H3 and the MFD. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|---|------------------|
| 9 | | EN33 | 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 | Policy EN33 was necessitated by a need for the Local Plan to specify the exact extent of the development area (site boundary). Future (longer term) development phases may be considered through a review of the Strategic Plan (JCS). | No change |
| 9 | | EN33 | The land at Slaters Lodge should be incorporated within the policy proposals | Policy EN33 was necessitated by a need for the Local Plan to specify the exact extent of the development area (site boundary). Future (longer term) development phases may be considered through a review of the Strategic Plan (JCS). | No change |
| 9 | Appendix 6 | EN33 | MFD does not recognise different roles of Higham and Rushden (Market and Growth Towns) | The MFD deals with the detailed masterplanning for Rushden East. Matters of the spatial strategy (specific roles for Rushden and Higham Ferrers) are addressed through relevant policies in the Joint Core Strategy (Policy 11) and Part 2 Plan Policy EN1. | No change |
| 9 | Appendix 6 | EN33 | Policies designed to protect the heritage of Higham are not recognised by the Local Plan | Any specific proposals for Rushden East will need to be determined in accordance with the MFD, Policy EN33 and the adopted development plan, as a whole. Any proposals would need to meet all relevant policies regarding the historic environment, with reference to JCS Policy 2, Local Plan Part 2 policies EN14-EN15 and relevant policies in the Higham Ferrers and Rushden Neighbourhood Plans. Any proposals would need to demonstrate that they are in compliance with all of these policies. | No change |

| Section | Para-graph/ Figure/ Table ref (as appro- priate) | Policy ref (if appro- priate) | Issue (summarised in Regula- tion 22 Statement of Consulta- tion) | Council response - how will issue be addressed? | Changes to Plan? |
|----------------|---|--|--|--|-----------------------------|
| 9 | Appendix 6 | EN33 | Local solution needs to be found for improving services in Higham, not just through the creation of Rushden East | Rushden East is just one (albeit the most significant) development proposal being promoted through the development plan. The consented schemes to the east of Ferrers School (HF.H4) and Federal Estates (EN37) should deliver significant infrastructure and environmental improvements to benefit Higham Ferrers. | No change |
| 9 | Appendix 6 | EN33 | MFD not consistent with Higham Ferrers Neighbourhood Plan | It is unclear as to how EN33 does not accord with Higham Ferrers Neighbourhood Plan Policy HF.H3. Consideration has been given to relevant Neighbourhood Plan policies (both Higham Ferrers and Rushden) in preparing the MFD. | No change |
| 9 | Appendix 6 | EN33 | MFD does not provide a well-connected and integrated development | Since the inception of Rushden East (c2012) it has been recognised that the most significant constraint/challenge to delivery of a sustainable development is how this could be integrated with the existing urban area. The MFD has considered potential options for future access arrangements, which will be agreed through partnership working between the developers, highway authority and local planning authority. | No change |
| 9 | Appendix 6 | EN33 | Representations to the MFD have not been fully considered or properly acknowledged | Feedback from the initial MFD consultation (February - March 2020) informed the 2nd focused changes consultation (October - November 2020) and the decision to incorporate the MFD into the Local Plan Part 2. Consultation feedback was reported to the Planning Policy Committee, 10 December 2020 (Item 6) and informed the finalised MFD, published with the main Local Plan Part 2 (February 2020). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|---|---|------------------|
| 9 | Appendix 6 | EN33 | Location of the employment area is not justified | The employment area is situated closest to the Trunk Road network (A45). It is also readily accessible from the A6 Bypass (strategic north/ south route) and on this basis the proposed location is considered to be appropriate. | No change |
| 9 | Appendix 6 | EN33 | Need for a separate cemetery for Higham residents within Higham parish | Development of one or more cemeteries is likely to be necessitated by the scale of development proposed at Rushden and Higham Ferrers in the Local Plan. These are an appropriate rural/ open countryside use, so could be delivered either as an integral part of the Rushden East SUE, or entirely separately. | No change |
| 9 | Appendix 6 | EN33 | Further details required as to what primary health care facilities will be provided | Any specific proposals for Rushden East will need to be determined in accordance with the MFD, Policy EN33 and the adopted development plan, as a whole. Any proposals would need to meet all relevant policies regarding the historic environment, with reference to JCS Policy 2 and relevant policies in the Higham Ferrers and Rushden Neighbourhood Plans. Any proposals would need to demonstrate that they are in compliance with all of these policies. | No change |
| 9 | Appendix 6 | EN33 | The policy status of Appendix 6 is unclear | The inclusion of the MFD as an appendix (Appendix 6) to the Local Plan Part 2 was determined on the basis of legal advice. Policy EN33 provides the relevant policy "hook" for the more detailed policy guidance/ direction provided at Appendix 6 (MFD). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|----------------|--|--|--|--|-------------------------|
| 9 | Appendix 6 | EN33 | A number of specific policy requirements contained within the MFD should be brought into the wording of Policy EN33 | The inclusion of the MFD as an appendix (Appendix 6) to the Local Plan Part 2 was determined on the basis of legal advice. Policy EN33 provides the relevant policy "hook" for the more detailed policy guidance/ direction provided at Appendix 6 (MFD). | No change |
| 9 | Appendix 6 | EN33 | No clear evidence for restricting the size of B8 units | The potential scale of warehousing and distribution units (B8 uses) could have significant impacts upon the broader landscape. The Joint Core Strategy (Policy 24) already differentiates between larger/ strategic and smaller (<9,300 sq m floorspace) warehouse/ distribution buildings. This provides the strategic policy basis for potentially restricting the scale of individual units, in recognition of their broader environmental impacts. | No change |
| 10 | | EN34 | Rail station required to connect London/ Bedford/ Wellingborough | Potential proposals for a mainline railway station serving Rushden/ Irchester are set out at JCS Policy 17(a). This proposal is a longer term aspiration and the achievability of this policy may be reconsidered through a review of the JCS. | No change |
| 10 | | EN35 | Re-development of town centre supported – but include food court/ McDonalds or other fast food chains and authentic food providers | Detailed proposals such as the mix of uses to support redevelopment proposals would be the subject of detailed masterplanning work. Policy EN35 is intended to provide the overarching framework to guide any potential redevelopment proposals for the site. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|--|------------------|
| 10 | | EN35 | Object to the suggestion of a built facilities strategy to inform future opportunities for the relocation of the Splash Pool Leisure site | Any redevelopment proposals would entail the relocation of the existing leisure facility to a new premises. Any redevelopment scheme would need to take place in sequence with the construction of a replacement leisure facility (i.e. swimming pool). | No change |
| 10 | | EN35 | 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 EN35 is dependent upon the relocation of the Splash Pool facility. As/ when a suitable site and proposals for relocation of this have been put forward, then the policy provides the necessary guidance/ direction to support any redevelopment of the existing site. | No change |
| 10 | | EN37 | Site layout should be designed to take existing foul sewer into account | Any redevelopment proposals would be dependent upon the need to overcome existing development constraints such as on-site utilities. Masterplanning for any detailed redevelopment proposals would need to satisfactorily address these constraints. | No change |
| 10 | | EN38 | 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 | The detailed policy content (i.e. criteria) is a matter of identifying site specific requirements, while avoiding repetition of generic criteria that could apply to all developments. Policy EN38 is considered to highlight all of the key issues affecting the site (criteria (a) - (e)). | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|--|------------------|
| 10 | | EN40 | 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 loss of the Rushden and Diamonds FC, while regrettable, has already taken place. The former stadium site is now vacant/ derelict (i.e. already lost). Policy EN40 allows for a range of potential uses, corresponding to the specific development constraints affecting the site (notably the Flood Zone status and proximity to the SPA/ Ramsar site). The potential replacement of the former stadium could be delivered in accordance with Rushden Town Council's new sports hub proposals and/ or development of Rushden East SUE. | No change |
| 10 | | EN40 | 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 | The loss of the Rushden and Diamonds FC, while regrettable, has already taken place. The former stadium site is now vacant/ derelict (i.e. already lost). Policy EN40 allows for a range of potential uses, corresponding to the specific development constraints affecting the site (notably the Flood Zone status and proximity to the SPA/ Ramsar site). The potential replacement of the former stadium could be delivered in accordance with Rushden Town Council's new sports hub proposals and/ or development of Rushden East SUE. | No change |

| Section | Paragraph/ Figure/ Table ref (as appropriate) | Policy ref (if appropriate) | Issue (summarised in Regulation 22 Statement of Consultation) | Council response - how will issue be addressed? | Changes to Plan? |
|---------|--|--------------------------------|--|--|------------------|
| 10 | | EN40 | Policy be amended to allow residential development, subject to works being undertaken allow the site to be re-designated as flood zone 1 | As things stand, the site is currently almost entirely designated Flood Zone 3; therefore unsuitable for residential development. This matter could be reconsidered in the event that the site was to be redesignated in future by the Environment Agency. The site's immediate proximity to the SPA/ Ramsar site could also have implications for its suitability for residential development (Natural England would need to advise further). | No change |
| 10 | | EN40 | The site is located adjacent to the SPA and it would be expected that a site specific HRA to assess all potential impacts is undertaken | The site's immediate proximity to the SPA/ Ramsar site would entail, with virtual certainty that a site specific HRA is necessary. This would be undertaken under guidance/ direction from Natural England. | No change |
| 10 | 10.60 | | Seek retention of Oundle long stay car park (East Road/ Nene Business Park) | The current usage of the long stay Herne Park car park is now recognised in the Plan text, at paragraph 10.60. It is recognised that the site is not currently available for redevelopment (paragraph 10.61) and the Plan does not propose release of the site for alternative uses. | No change |
| 11 | | EN33 | The monitoring framework should include indicators relating to the delivery of key elements of the Rushden East SUE | Table 29 sets out the overall monitoring indicators for Policy EN33. This supports other monitoring indicators from the Joint Core Strategy (Policy 33). | No change |
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