



East Northamptonshire Local Plan Part 2

East Northamptonshire Local Plan Part 2 - Response to Inspector's Initial Questions:

The Council's initial response to the series of questions posed by the Inspector in relation to the examination of the East Northamptonshire Local Plan Part 2 are set out below:

IQ1:

a) Are there any strategic policies in the Plan?

- 1.1 Yes, a number of policies have been identified as strategic in nature in that they add value to the overarching strategic policies of the Part 1 Local Plan and provide guidance for neighbourhood plans. These policies are set out in Appendix 1 of the Local Plan as follows:

EN1 Spatial development strategy	EN14 Designated Heritage Assets
EN2 Settlement Boundary criteria – urban areas	EN15 Non-Designated Heritage Assets
EN3 Settlement Boundary criteria – freestanding villages	EN16 Tourism, cultural developments and tourist accommodation
EN5 Development on the periphery of settlements and rural exceptions housing	EN20 Relocation and/or expansion of existing businesses
EN6 Replacement dwellings in the open countryside	EN22 Impact test thresholds for retail development
EN7 Green Infrastructure corridors	EN24 – EN27 Oundle housing allocations
EN8 The Greenway	EN28 Land east of the A6/ Bedford Road, Rushden
EN9 Designation of Local Green Space	EN29 Delivering wheelchair accessible housing
EN10 Enhancement and provision of open space	EN30 Housing mix and tenure to meet local needs
EN11 Enhancement and provision of sport and recreation facilities	EN31 Older people's housing provision
EN12 Health and wellbeing	EN32 Self and custom-build housing
EN13 Design of Buildings/ Extensions	EN34 Reimagining Town Centres – guiding principles

b) How have they been defined?

- 1.2 The strategic policies set out in the Local Plan take reference from the recently revised (July 2021) NPPF para 17, and the Glossary, in that they are all policies that seek to address the Council's strategic priorities for development and the use of land

within its area. They seek to add guidance to the Joint Core Strategy (JCS) by providing a clear delivery strategy for the pattern of future growth across East Northamptonshire and to provide overall direction for neighbourhood plans. It is acknowledged that the identification of “strategic policy” is not precise, but a matter of judgement, however, the strategic nature of those policies identified in IQ1a) have been defined through an assessment of the criteria set out in para 076 of MHCLG’s Neighbourhood Plan guidance;

- Whether the policy sets out an overarching direction or objective
- Whether the policy seeks to shape the broad characteristics of development the scale at which the policy is intended to operate
- Whether the policy sets a framework for decisions on how competing priorities should be balanced
- Whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the local plan or spatial development strategy
- In the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the local plan or spatial development strategy
- Whether the local plan or spatial development strategy identifies the policy as being strategic

1.3 Appendix 1 of the Local Plan provides further definition by setting out a commentary explaining what has informed the approach to defining each policy as either strategic or non-strategic.

c) Why are they justified for inclusion in a Part 2 Plan?

1.4 They are required to amplify the detail of the strategic priorities in the Part 1 Plan, setting out a framework of how those priorities will be addressed within East Northamptonshire. They are considered as policies that seek to address the Council’s strategic priorities for development and the use of land within its area. They also provide greater clarity for neighbourhood plans, setting out which policies are to be regarded as strategic as required by NPPF para 21.

d) If there are any strategic policies in the Plan, do they accord with paragraph 22 of the Framework insofar as they identify sufficient land to meet needs up to at least 2037?

1.5 It is acknowledged that the NPPF provides guidance that requires strategic policies to look ahead over a minimum 15-year period. However, the policies of the Part 2 Local Plan are provided to add detail to the overarching framework of the JCS, which at the time of its adoption provided a 15-year period for anticipating longer term requirements and policy opportunities as required by the NPPF. This does not require for example “the identification of sufficient land to meet needs up to 2037” In respect of the Part 2 Plan it is maintained that the delivery of the strategic requirements, such as housing allocations, will be met within the plan period.

IQ2:

a) Is the list of made and emerging NPs up to date? If not, can an update be provided?

2.1 The list of made and emerging NPs submitted is up to date. As of July 2021, within the East Northamptonshire area, there are 21 designated Areas and 10 made Neighbourhood Plans.

b) Are the policies in the Plan intended to apply to areas covered by made NPs? Are there any instances of duplication of NP policies?

2.2 It is recognised that the emergence of new policy through plan making can create considerable uncertainty for emerging or made neighbourhood plans. However, the intention is that policies are to be applied consistently, unless there are local circumstances that can justify otherwise. Further, some of the earlier made neighbourhood plans (for example Higham Ferrers (made in April 2016) are over 5 years old.

2.3 It is therefore the intention to apply the emerging Local Plan policies to those areas covered by made neighbourhood plans. This Plan contains a mixture of strategic and non-strategic policies and has been written to “minimise any potential for conflict between non-strategic Local Plan and extant Neighbourhood Plan policies.” (para.1.20 LPP2). The Part 2 Local Plan provides district -wide coverage for the former East Northamptonshire area, given the number of made neighbourhood plans in the district it is recognised that some degree of “overlap” or duplication exists. A list of policies where potential overlap occurs is set out in the following link:

[Neighbourhood Plan policies and their relationship to emerging Local Plan policy.](#)

c) How do the policies in the plan take into account the made NPs?

2.4 In para.1.20 it is explained that “Neighbourhood Plans by definition are non-strategic in scope” and that to be effective their policies should add local value and distinctiveness to the policies of the Local Plan.

2.5 As stated above throughout the plan-making process policies have been written with an understanding of what each neighbourhood plan is seeking to achieve, and to help tailor policies to “fit together” as much as possible. Whilst the aim is to remove duplication and to minimise any potential for conflict with made neighbourhood plan policies, this is set against the need to progress plan making, recognising that new policies continue to emerge, providing up to date guidance, unless local circumstances justified otherwise.

2.6 However, there are clear examples set out in the Local Plan where extant neighbourhood plan policies have helped to shape emerging policy. For example, section 4 of the LPP2 (Spatial Development Strategy) recognises the functional role of individual settlements, often amplifying an approach borne out through individual Neighbourhood Plans.

2.7 The Plan has been written in order to delegate matters of solely local (i.e. non-strategic) significance to neighbourhood planning; e.g. the definition of linear development/ settlement boundaries on the Policies Map (policies EN2-EN5) and the designation of Local Green Spaces (Policy EN9). This reflects the fact that most of the made Neighbourhood Plans include linear settlement boundaries and/ or Local Green Space designations.

2.8 The settlement hierarchy (Policy EN1/ Table 5) specifically acknowledges certain made Neighbourhood Plans. The proposed designation of Wakerley as a restraint

village reflects the Barrowden and Wakerley Neighbourhood Plan (made December 2019). The inclusion of Chelston Rise within the settlement hierarchy similarly reflects the spatial strategy for that settlement, which was set by the Chelveston cum Caldecott Neighbourhood Plan (made July 2017).

d) Are there any of the NP policies intended to be superseded by the policies in the Plan.

2.9 Whilst the creation of new policy through the emergence of the LPP2 provides the potential for some duplication of existing neighbourhood plan policies, an initial assessment of the various neighbourhood plan policies indicates that no specific policies are considered to be completely overwritten through the emerging Part 2 Local Plan policies details of which are provided in para 2.3 of this letter.

e) Does the Plan make appropriate reference to the policies and proposals in the NPs?

2.10 Yes, clear reference is made to the context of policies and proposals contained in neighbourhood plans. Reference is set out in the opening para 1.1 of the Local Plan. The context is further explained through paras 1.17 -1.21.

2.11 In particular para 2.5 references the implications of neighbourhood plan policies and the remainder of the area portrait section of the Plan refers to the aims and progress of the various neighbourhood plans across East Northamptonshire. Specifically, para 2.54 recognises that where possible the Local Plan should recognise and complement extant policies from made, and emerging neighbourhood plans.

2.12 Having set out the context of policy development in relation to extant neighbourhood plan policy, there are numerous references to specific neighbourhood plan policies/proposals throughout the Local Plan, particularly in relation to section 4 of the Local Plan which sets out an approach to the spatial development strategy across East Northamptonshire.

IQ3:

a) Is there a reason why the requirements for the parishes/ villages in Table 18 have not been set out in a policy?

3.1 The NPPF does not specifically require that indicative housing figures should be set out in a policy. In East Northamptonshire, the rural housing requirement has already been met as follows: delivered (513 dwellings); committed (261 dwellings) or allocated in Neighbourhood Plans made since 1st April 2019 (54 dwellings); as such the approach has been to set out the context in the supporting text/table of the Local Plan which, it is considered, reflects more appropriately the nature of the guidance in respect of proposing indicative figures. This is set out in para 8.15 of the Local Plan, consequently, the figures are provided as indicative guidance through the Plan rather than as a policy requirement.

b) What is the justification for the housing requirements for the parishes/ villages as set out in Table 18?

3.2 Para's 66 and 67 of the NPPF state that strategic policies should also set out a housing requirement for designated neighbourhood areas or at least provide an indicative figure. JCS Policy 29 and accompanying Table 5 set out overall guidance for rural housing provision that is expected to be undertaken outside the growth and market towns of the area. However, no further guidance is provided in respect of how

this quantum of development could be delivered. On this basis it considered appropriate for the Part 2 Plan to provide further local direction. Therefore, this plan seeks to address this requirement by setting out additional local direction and identifying an appropriate quantum of development for each parish/village – to help meet a locally arising need (in accordance with policies 11(2)(a) and 29 of the JCS). As indicated above to question (b) this table will help assist neighbourhood plans in providing for future development needs.

c) Are they intended to provide ‘strategic guidance’ as suggested in paragraph 8.17 of the Plan, or to be indicative as stated in Table 18?

- 3.3 The purpose of the figures is to inform neighbourhood plans by providing indicative guidance, setting out an appropriate level of development for the parishes/ villages listed, based on the size of the settlement (as identified by the 2011 Census) and supported by local housing needs assessments. The term “strategic guidance” contained in para 8.17 is intended to signify that the guidance is applicable across the rural settlements of East Northamptonshire. However, it is accepted that the interpretation may be misconstrued as the figures themselves are indicative. For clarity it is suggested that the word “strategic” in para 8.17 could be replaced by the word “indicative”. (AM22).

d) Are the figures/ ranges intended to be additional to the supply of houses identified in the plan?

- 3.4 Yes, the indicative rural housing need is intended to be additional to the supply of housing as required through the JCS, which sets out minimum housing requirements up to 2031. The minimum rural housing requirement (as set out in the JCS) has already been met so they provide an indicative requirement which could meet a locally arising need as indicated in the JCS policies 11(2) (a) and 29 or assist the production of neighbourhood plans should they wish to provide additional development.

IQ4:

a) Is the intention for the MFD to be examined in itself? That is, considered against the tests of soundness?

- 4.1 The MFD forms an integral part of the Local Plan. Policy EN33 makes clear that: *“Policy 33 of the JCS requires a masterplan to be prepared to define the policy expectations for the development of the SUE. The MFD forms part of the Local Plan and it is set out as an appendix to that document.”*
- 4.2 It is therefore the intention that the MFD will be examined as part of the Local Plan examination.
- 4.3 A report to the Planning Policy Committee (Item 6 titled East Northamptonshire Local Plan Part 2 - Response to the consultation on Alternative Viable Site Allocations and Rushden East Sustainable Urban Extension Policy) held on 10 December 2020 provides clarity on the Council’s approach in respect of the MFD. In particular Appendix 2 of the report sets out a summary of officer responses in relation to the Rushden East SUE representations received from the Local Plan public consultation held between 5 October-16 November 2020. A link to this report is attached.

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

b) The Council's response to the representations suggest that the MFD's inclusion in the Plan was determined on the basis of legal advice. Since it is referred to, would the Council be happy to share this advice?

4.4 The Council has looked into this request and is prepared to disclose the legal advice obtained for the Inspector's information. A copy is attached as follows: [Legal Advice](#)

c) Would the adoption of the MFD as part of the development plan afford sufficient flexibility for the delivery of the SUE and would it be effective? Would it be able to adapt to changing future circumstances without requiring a review of the Plan?

4.5 The MFD is considered to be sufficiently flexible, it sets out some high-level principles which amplify the key strategic requirements of delivering the SUE, to help ensure that a piece-meal development approach is avoided.

4.6 However, para 1.1.4 of the MFD makes clear that it is not the expectation of the MFD to resolve all the detailed matters for the SUE. It provides a framework for the evolution of the SUE, which will continue to evolve, leaving the developer to bring forward details that can be addressed through future planning applications. What is required is a holistic assessment of whether the proposals comply with the MFD overall, not necessarily a response that "ticks every box". Addressing the main policy delivery principles is key to ensuring the SUE meets expectation.

4.7 It is acknowledged that the MFD by its very nature provides a long-term vision for the development of the SUE, so needs flexibility, which is echoed through section 1.3. of the document. Section 1.3 of the MFD explains how it should be used. The MFD identifies key principles to achieve, effectively, the requirements of Policy 33 of the Joint Core Strategy 2016. It provides plans, diagrams and precedent images, showing examples of how the key policy principles can be delivered. Each section of the MFD concludes with a "blue-box" summary setting the key policies and design principles that any application will need to comply with to meet the policy requirements listed in Policy 33 of the Joint Core Strategy.

4.8 The MFD makes clear that alternative approaches to achieving the key principles and policy requirements will be considered where a clear rationale is given. For example, the second paragraph of the "blue-box" on page 38 states – with reference to the policy requirement of achieving good connections to the Rushden and Higham Ferrers - that a clear rationale should be provided for any alternative approach to that shown in figures 2.17 to 2.19 and figures 2.21 to 2.23.

4.9 The MFD is consistent with Stage 3 of Homes England's Masterplanning and statutory planning process [table](#). The "Statutory Planning Process" table is extracted from Central Government's Garden Communities Toolkit, (published on 27 September 2019) and sits within the Planning and Design Process of the toolkit as follows:

<https://www.gov.uk/guidance/garden-communities/masterplanning>

4.10 The planning application requirements set out in the blue boxes within the MFD will help to ensure its effectiveness in seeking to address the key policy principles in delivering a comprehensive approach to the implementation of the SUE.

4.11 It is considered that the MFD will be able to adapt to changing future circumstances. This is because the MFD is intended to provide a spatial development context for delivery of the SUE, to inform future planning applications. Many of the detailed delivery requirements are therefore expected to be developed through the submission of a future planning application(s).

d) What is the relationship between Policy EN33 and JCS Policy 33? Is Policy EN33 intended to supersede JCS Policy 33 (as suggested in the Council's response to representations)?

4.12 JCS Policy 33 provides the strategic policy guidance for delivering the Rushden East SUE. EN Policy 33 sets out the delivery requirements of this policy in the local context. It is identified as a non-strategic policy in Appendix 1 of the LPP2, where more detail is provided to amplify the strategic policy direction. Specifically, Policy EN33 establishes the principle of the development provided in Policy 33 of the JCS, by setting out site specific detail including setting a site boundary and explaining how the strategic policy expectations can be met.

4.13 The Local Plan policy, through the MFD, illustrates the form and disposition of the proposed development and seeks to establish a strategy for delivering matters such as land use, transport and movement, access, open space, design and infrastructure, as well as addressing environmental considerations.

4.14 The Council's response to representation 38/02 relates to the point being made in the first sentence in the representation, which, in effect, is the issue that has been raised. The comment made in the second sentence by the representor that the only guiding policies are contained within the JCS is incorrect as the made neighbourhood plans of Rushden and Higham Ferrers clearly form part to the statutory development plan.

4.15 To clarify Policy 33 of the JCS provides strategic guidance which is not proposed to be superseded through Policy EN33 of the Local Plan Part 2.

e) Is Policy EN33 consistent with JCS Policy 33? For example, is the MFD informed by a project level Habitats Regulations Assessment to ensure the protection of the Upper Nene Gravel Pits Special Protection Area? Does the MFD include a delivery strategy to identify how and when the development will be implemented as set out in paragraph 10.32 of the JCS?

4.16 It is considered that Policy EN33 is consistent with JCS Policy 33 in that it seeks to deliver additional policy guidance, including setting out the site boundaries for the delivery of the SUE through a MFD. The policy aims to provide a spatial development context for the delivery of Rushden East, to inform future planning applications and proposals for development.

4.17 The Council undertook a HRA for the Local Plan which was submitted as part of the supporting documentation list. In respect of Rushden East page 65 of the HRA provided an assessment of Policy EN33 and explains that as Rushden East SUE is an allocation made through the JCS, it has already been subject to appropriate assessment at that stage and mitigation measures have been identified and are being delivered regarding both recreational pressures and impacts on functionally linked land. This work is incorporated into the mitigation/design proposal set out in the MFD, informed by meetings with Natural England. In respect of the SPA for example.

- 4.18 The introduction of the wording *to be informed by a project level HRA* was introduced to ensure that the impact of the HRA was considered when more detail was worked up on the SUE. As indicated the HRA of the Local Plan covered the policy approach to the SPA. As such a specific project level HRA has not been undertaken in respect of the producing the MFD. It is therefore acknowledged that further detail will be needed to inform future planning applications as indicated on page 27 of the MFD.
- 4.19 The MFD includes a Delivery Strategy which is set out in Section 3 of the Document. Further detail will be required to be set out in a future planning application.

f) How does the MFD relate to the Higham Ferrers and Rushden NPs? Paragraph 6.57 of the Plan refers to the Higham Ferrers Neighbourhood Plan providing a masterplanning/development framework for Rushden East, for those parts of the SUE situated in the parish of Higham Ferrers. Does the MFD have regard to the NPs? Are there any instances of conflict or duplication? Does it make appropriate reference to them?

- 4.20 The MFD forms part of the LPP2. As indicated within the officer responses the Local Plan has been drafted with close reference to and understanding of the various made neighbourhood plans and the policies they contain. The drafting of the MFD has similarly considered the policies in the Rushden and Higham neighbourhood plans.
- 4.21 The reference to the Higham Ferrers Neighbourhood Plan in para 6.57 is a reference to provide context to the proposed development which lies immediately to the north of the Rushden SUE, which relates to a new school proposal and a wider sports hub.
- 4.22 The specific reference to the masterplanning relates to Policy HF.H3 of the Higham Ferrers Neighbourhood Plan. This policy effectively provides a supporting policy for enabling a detailed MFD to come forward. It highlights some key considerations locally for delivering the MFD. It does not however set out a specific location for the proposal, instead an asterisk is shown in figure 7 indicated the general location where the policy would support the referred development.
- 4.23 The production of the MFD was informed by the Rushden East Project Board which included representation from Higham Ferrers ward members and Higham Ferrers town council.
- 4.24 It is not considered that there is any fundamental conflict between the two neighbourhood plans and the MFD. Both neighbourhood plans were made significantly in advance of the submission version of the MFD, particularly in respect of the Higham Ferrers Neighbourhood Plan, which was made in April 2016, and as anticipated the progression of the MFD has enabled it to develop during that time period, taking into account evidence-based studies, work with the developer consortium, the project board and the town councils, along with various consultation exercises.
- 4.25 The MFD recognises the status of the two neighbourhood plans at paras 1.2.7 and 1.2.8. As indicated above the drafting of the MFD has been informed by various work streams. It is also important to state that it is not the role of the MFD to resolve all of the detailed matters for the SUE (para 1.1.4 refers), consequently, future planning applications will continue to provide the opportunity for the vision and policies set out in the Council's statutory development plan to be realised

IQ5:

a) With paragraph 10 of the PPTS in mind, where are the specific deliverable sites that will accommodate these identified needs in the next five years, and what are the specific, deliverable sites, or broad locations for growth to accommodate those needs in the rest of the plan period?

5.1 Identified accommodation needs for Gypsies, Travellers and Travelling Showpeople in the area will be met through the use of criteria-based policies and through the preparation of the North Northamptonshire Gypsy and Traveller Site Allocation Policy DPD. An updated Local Development Scheme is currently being prepared for North Northamptonshire, this LDS will include the timetable for preparation of the North Northamptonshire Gypsy and Traveller Site Allocation Policy DPD. The preparation of this document will enable a North Northamptonshire wide approach to be taken to meeting Gypsy, Traveller and Travelling Showpeople accommodation needs.

5.2 The response to question b) provides further information on the level of need identified and how this will be met through the use of criteria-based policies and the North Northamptonshire Gypsy and Traveller Site Allocation Policy DPD.

b) What is the evidence that the Plan would meet the housing needs of those meeting the definition, as well as the housing needs of ethnic gypsies and travellers arising from ‘undetermined’ households and for those who do not meet the PPTS definition? Is this need effectively addressed through the policies in the Plan?

5.3 The 2019 GTAA (which was updated comprehensively in 2018) sets out Gypsy, Traveller and Travelling Showpeople accommodation needs. The GTAA identifies need to 2033 but splits the need to 2031 to accord with the plan period.

5.4 The GTAA (2019) splits need into three categories, households that met the planning definition, undetermined households and households that do not meet the planning definition. Paragraph 1.8 and 1.31 of the GTAA advise that only the need from households who met the planning definition or undetermined households who may subsequently demonstrate that they meet it should be considered as need arising from the GTAA.

Gypsy and Traveller Households – Identified Need

5.5 There were no Gypsy and Traveller household identified in East Northamptonshire who met the planning definition, 67 undetermined households that may meet the planning definition and 6 households that did not meet the definition.

5.6 The GTAA identified a need for no additional pitches for households that met the definition, a need for 17 additional pitches for undetermined households and 11 additional pitches for households that did not meet the planning definition. For undetermined households if the ORS national average of households who meet the definition of 25% is applied this could result in a need for 4 additional pitches.

5.7 The table below shows the additional need for Gypsy and Traveller Households in East Northamptonshire 2018 – 2031.

Status	Identified need 2018-31	Identified need 2031-2033
Meet Planning Definition	0	0
Undetermined	14	3

Do not meet Planning Definition	11	0
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Travelling Showpeople – Identified Need

- 5.8 There is one Travelling Showpeople yard in East Northamptonshire, all 4 households met the planning definition and the GTAA identified a need for 6 additional plots for households that met the planning definition.

Meeting the Identified Need – Gypsy and Traveller Households

- 5.9 The GTAA recommends that for Gypsy and Traveller households who meet the planning definition the need is addressed through new pitch allocations or the expansion or intensification of existing sites, which would be through the Local Plan process. There was no identified need for Gypsy and Traveller pitches for households that met the planning definition and therefore there is no need to identify new pitch allocations in the Plan.
- 5.10 The GTAA advises that careful consideration is given to how the needs associated with undetermined travellers are met as it is unlikely that all of this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. The GTAA recommends the use of a criteria-based policy for any undetermined households opposed to making specific allocations.
- 5.11 Paragraph 1.18 of the GTAA explain the reasons there were so many undetermined households identified in East Northamptonshire, this was because ORS were refused access to the majority of pitches on three private sites by the owners. However, the site owners were able to confirm that they are able to meet any current and future needs that may arise on their sites over the 15-year GTAA period.
- 5.12 The Council therefore considered that a criteria-based policy is the most appropriate mechanism for addressing need from undetermined travellers who subsequently demonstrate that they meet the definition. Within the Local Plan, Policy 31 of the adopted North Northamptonshire Joint Core Strategy (2016) safeguards existing lawful sites, pitches and plots for continuing use and provides the mechanism for sites to be delivered through the development management process. This provides a criteria-based policy for addressing need from underdetermined households and there is no need for an additional policy to be included in the Part 2 Local Plan.
- 5.13 In addition to this the Ringstead Neighbourhood Plan which was submitted to the Council on 10th February 2021 also includes a criteria-based policy which supports the intensification of the Hilltop Farm Gypsy and Traveller site where the criteria set out in the policy are met.
- 5.14 The GTAA advises that in general terms, the need for those households who did not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies - including any plans that have already been adopted, as all travellers will have been included as part of the overall Objectively Assessed Need - OAN. The GTAA recognises that all the Council's already have in place an NPPF (2012) compliant adopted Local Plan (North Northamptonshire Joint Core Strategy) that sets out overall housing need and advises that when this plan is reviewed, or a new plan prepared, the findings of the GTAA should be considered as part of the future housing mix and type within the context of the assessment of overall housing need. Needs of those households who did not meet the planning definition will therefore be met through existing housing

policies contained in the North Northamptonshire Joint Core Strategy and through the subsequent review of the strategic plan.

Meeting the Identified Need – Travelling Showpeople

- 5.15 A need was identified for 6 additional plots for Travelling Showpeople who met the planning definition. Paragraph 1.32 of the GTAA recommends that need arising from households who met the planning definition should be addressed through yard allocation/intensification/expansion Local Plan Policies. The GTAA, paragraph 1.37, explains that the identified need for 6 additional plots is made up of 3 concealed or doubled-up households or adults, 2 from teenagers who will be in need of a plot of their own in the next 5 years, and 1 from in-migration.
- 5.16 The North Northamptonshire Gypsy and Traveller Site Allocation Policy DPD will include policies and allocations to meet need arising from households who met the planning definition, the need for Travelling Showperson plots will therefore be met through the preparation of this document. In addition to this, Policy 31 of the JCS provides criteria to assess any planning applications which may come forward to meet this need.
- 5.17 Through drafting the response to this question it has become apparent that a main modification is required to this chapter of the plan to correct table 21, to provide clarification on the amount of need relating to undetermined households and to make reference to the identified accommodation need for Travelling Showpeople, as well as explaining the approach to meeting this need (MM30a).

c) Did the SA consider different policy options for meeting G&T needs? Was the option of allocating specific sites to meet identified needs, as required by national policy assessed?

- 5.18 The SA did not consider different policy options for meeting G&T needs. The approach to gypsy and traveller accommodation was considered through themed workshops which took place from May 2017 to April 2018 which informed the approach set out in the Plan of relying on Policy 31 of the JCS to provide a clear steer for future planning applications which may arise.

d) Is this approach to meeting the needs of gypsies and travellers and travelling showpeople justified, effective and consistent with the JCS and national policy?

- 5.19 The approach to meeting the needs of gypsies and travellers and Travelling Showpeople is justified, effective and consistent with the JCS and national policy. The GTAA update has recognised that meeting accommodation needs is more complicated than simply setting a requirement to deliver a number of pitches by the end of the Plan period. No sites have been proposed or granted planning permission since the start of the Plan period and no representations were received as a result of draft plan consultations. Should future planning applications arise the JCS: Policy 31 provides clear guidance. The approach set out under question b identifies two elements to the approach to meeting provision, the first is the use of a criteria-based policy (JCS Policy 31) to address need from undetermined households and to consider planning applications which may come forward and secondly, the preparation of the North Northamptonshire Gypsy and Traveller Site Allocation Policy DPD to address needs for accommodation on a North Northamptonshire wide basis.

This approach will ensure that accommodation needs are met, this approach is therefore justified, effective and consistent with the JCS and national policy.

IQ6:

a) I am aware that the Council is in contact with Natural England in response to the representations made to the Plan. These discussions should result in the preparation of a statement of common ground to identify areas of agreement/ disagreement and to cover the points made above. When will this be available?

6.1 A Statement of Common Ground has been completed following a series of meetings with Natural England this has been published as part of the Council's Index of Documents. [Statement of Common Ground with Natural England](#)

b) Can the Council confirm whether further work is likely to be required to demonstrate mitigation in respect of recreational disturbance? If so, what would it entail and what is the timescale for the work?

6.2 It is unlikely that further work will be indicated for this Plan as a future mitigation strategy is now being discussed to assist the review of the JCS. Meetings are now underway to inform the wider implications of recreational disturbance and functionally linked land with Natural England, the Wildlife Trust and relevant adjoining local authorities.

IQ7:

Notwithstanding these circumstances, to be clear, and with paragraph 74 of the Framework and associated advice in the Guidance in mind, please can the Council clarify whether it is intending to 'confirm' its 5-year housing land supply through the plan?

7.1 North Northamptonshire Council is not seeking to 'confirm' its 5-year land supply through the Local Plan Part 2. The Plan was prepared using the latest data available (1st April 2019 base date) for the East Northamptonshire area at the time of publication (January/ February 2021). Shortly after publication of the Plan the housing land supply position for the 2019/20 year was agreed and this was submitted with the Plan, with a view to updating the figures to a 1st April 2020 position through proposed modifications. Document reference G-02 has updated the Housing Land Supply position to this date. This has been reflected in updates to Background Papers 9 and 10, which set out the updated housing requirements position for the urban and rural areas of the District.

7.2 [The Annual Position Statement \(G-02\)](#) identifies the latest 5-year housing land supply as 6.55 years, applying a 5% buffer. The updated Background Papers 9 and 10 reflect the latest Annual Position Statement, submitted alongside the Plan (document G-02).

7.3 For the 2021/22 monitoring period and beyond the new Council has resolved to calculate the 5-year land supply, through a single North Northamptonshire-wide requirement. However, data for this period is currently unavailable.

7.4 The Council is confident that the housing allocations set out in the Part 2 Local Plan will assist in meeting the overall housing requirements as set out in the Joint Core Strategy.

IQ8:

a) What updates are required to the Plan as a result of the updated monitoring data, and when will they be provided?

8.1 Updates have been prepared to sections 8 and 9 of the plan to reflect the 2020 monitoring data. These updates are set out in proposed modifications (MM21a, MM26a, MM30b and MM31a).

b) What are the implications of this new data for the housing supply evidence?

8.2 No significant changes have been identified as arising through the updated monitoring data beyond the actual updating of the figures. The housing commentary in the relevant Background Papers has been updated to reflect the latest housing land supply position.

c) Are changes required to any parts of the Plan?

8.3 Yes, these are set out in response to IQ8 (a).

d) Do any of the Background Papers need to be updated?

8.4 Yes, as set out in responses to IQ7.

e) What are the implications of this data on the progress of the SUEs, allocated sites and the housing trajectory? Where can clear evidence be found to justify when the housing completions on the identified sites would begin?

8.5 There are no fundamental implications in respect of the updated data in relation to the anticipated SUE/large site completions.

8.6 In respect of the evidence to support the trajectory a [Positional Statement](#) has been agreed with the main consortium for Rushden East. This Statement outlines that an agreed and updated housing delivery trajectory will be provided, construction of initial housing is projected to begin around 2024. The consortium submitted a planning application in November 2020, and an extension of time has been agreed up to January 2022. Regular meetings with the consortium and the Council are scheduled, which includes planning policy representation.

8.7 Similarly, a [Positional Statement](#) has been provided with the developers of the land east of A6/Bedford Road, Rushden, which has agreed the trajectory for the housing delivery of this large site.

8.8 Evidential work supporting the delivery proposal has been undertaken by the developer. Again, regular meetings are scheduled, though a planning application is not expected until later in 2021.

8.9 Irthlingborough West is a further commitment within the Local Plan. Whilst there have been previous discussions in respect of the delivery of this site the anticipated commencement of the site is more complicated. A comprehensively revised S106 agreement will be required, given the length of time since the planning application was first submitted and there are concerns relating to viability in respect of site delivery.

IQ9:

Can the Council confirm whether this is the case and where evidence of it can be found?

- 9.1 The Council can confirm that the requirement to accommodate at least 10% of housing requirements on sites no larger than one hectare, as set out in NPPF paragraph 69, has been met. Reference to this evidence has been incorporated into section 4 of the Rural Housing Paper ([Background Paper 10](#)) Update 2020. This (Background Paper 10, along with [Background Paper 9](#)) has been updated also in relation to the Housing Land Supply update to 2020, revised copies are appended to this letter.

IQ10:

Does the Council intend to update this (the Openspace and Playing Pitch Strategy) evidence? If so, what is the timeline for its production?

- 10.0 The Council does not intend to update this evidence. While the evidence is 5 years old the Council does not consider that the findings are out of date. Although there will have been changes to the provision of open space and sports and recreation facilities in the area since the evidence base was prepared it is not considered that this would affect the standards for provision identified. The standards seek to ensure that new developments contribute to the enhancement and provision of open space and sports and recreation facilities.

IQ11

a) Can the Council confirm whether the Plan relates to any strategic matters and whether it considers the DtC to be engaged in this case?

- 11.1 The Local Plan is a Part 2 Plan and provides detailed guidance for the East Northamptonshire area amplifying the strategic direction provided by the Part 1 Plan. There are no identified strategic matters which cross administrative boundaries and it is considered that the policies contained in the plan are “local” issues that can be addressed within the former East Northamptonshire Authority area. The Duty to Cooperate on strategic matters which cross administrative boundaries is therefore not engaged.

- 11.2 Section 5 of [The Statement of Consultation under Regulation 22](#) explains that strategic cross-boundary issues have been fully considered through the Part 1 Plan. This document also explains how the Council has continued to engage with duty to cooperate bodies through the preparation of the Part 2 Local Plan.

b) What are the cross-boundary issues referred to in paragraph 1.23 of the Plan and what has been done in terms of co-operation in this regard?

- 11.3 Para 1.23 relates to discussions with adjoining authorities in drafting the Local Plan. It is considered that reference to cross boundary issues in para 1.23 is incorrect wording and that this be deleted through a proposed modification (AM02).

c) What are the SOCGs referred to in paragraph 1.27 of the Plan and where can these be found?

11.4 The SOCGs have been prepared with two parties, [Natural England](#) and [Historic England](#), along with two Positional Statements relating to allocations at [Rushden East SUE](#) and the [Land east of A6/Bedford Road, Rushden](#)

d) With reference to the Upper Nene Valley Gravel Pits SPA and Ramsar site and the common issues which arise in terms of the mitigation strategy SPD (as detailed above), has the Council prepared a SOCG with Wellingborough Borough Council? Can details of the outcomes of the cooperation undertaken in this regard be provided?

11.5 The Council has engaged with Wellingborough Borough Council (WBC) along with other neighbouring authorities, as relevant, throughout the local plan process, which has informed the drafting of the Local Plan Part 2 and the policies it contains. This is referred to in the Reg 22 Statement at para 5.38, specifically in relation to the SPA.

11.6 In relation to the SPA, discussions have not identified the need for a formal SOCG to be drawn up with WBC. The DTC, which covers strategic matters has been addressed through the JCS and includes both the former administrative areas of Wellingborough and East Northants, which are covered by the same Part 1 Plan (the JCS). Wider team meetings set up for the former North Northamptonshire Authorities have been a regular and consistent area of the work stream over a number of years, including the drawing up of the SPA mitigation strategy, co-ordinated by the former Joint Planning Unit for North Northamptonshire. Regular wider team meetings with the constituent authorities of the former Northamptonshire area took place, along with a Chief Planning officer Steering group to ensure synergy within the workloads of the various councils.

11.7 Specifically relating to the SPA, WBC, East Northamptonshire Council (ENC) and the Joint Planning Unit (JPU) collaborated on the production of the SPA Addendum Mitigation Strategy. Governance for this was agreed collectively through a Memorandum of Understanding (MOU) in 2018. The Project group continues to meet to implement this strategy. ENC had a Service Level Agreement (SLA) with the WT signed in 2018 to deliver aspects of the mitigation in the ENC area, whilst WBC had a similar, separate agreement. This work continues and a new SLA was signed on behalf of North Northamptonshire Council (NNC) on 18.06.21 to cover those works going forward and inform the review of the Strategic Plan.

e) Is it the Council's intention to have any further discussions with representors or to prepare any SOCG in advance of the hearing sessions?

11.8 The Council is engaged in ongoing meetings with developers of larger sites; however, it does not intend to provide any further documentation than the following:

- [SOCG with Natural England](#)
- [SOCG with Historic England](#)
- [Positional Statement with the Rushden East Consortium](#)
- [Positional Statement with developer of land east of A6/Bedford Road, Rushden](#)

IQ12:

Where necessary do the policies in the Plan make it clear that their geographic application is illustrated on the policies map? I have identified a number of issues relating to this question as follows:

- a) Policies EN23 (Local centres), EN22 (Impact tests outside the primary shopping areas) and E17 (allocates land south of Chelveston Road Higham Ferrers for a new school) do not refer to the policies map.**
- 12.1 Proposed main modifications will be added to the schedule of proposed main modifications for Policies EN23, EN22 and EN17 to make it clear that their geographic application is illustrated on the policies map. (MM14a, MM18, MM19, MM20). A separate Policies Map schedule of changes will also be prepared.
- b) Paragraph 1.47 of the Plan indicates that the 3km and 4km buffer zones associated with the Upper Nene Valley Gravel Pits SPA/Ramsar site are shown on the policies map. I cannot find this annotation on the map or the key?**
- 12.2 The reference in paragraph 1.47 refers to the adopted Policies Map, this is the adopted Policies Map for the Joint Core Strategy. To provide clarity it is proposed to amend this wording of paragraph 1.47 to state ‘the adopted Policies Map **for the Joint Core Strategy**’. (MM01)
- c) Policy EN8 relating to the Greenway indicates that the Greenway is identified on the policies map. However, the main map and inset map indicate a number of annotations for EN8 including ‘completed’, ‘indicative’, ‘proposed’, and ‘sustrans’. To which of these annotations does Policy EN8 apply and where is this explained?**
- 12.3 It is intended that Policy EN8 applies to all these sections as together they form The Greenway, the individual annotations indicate the current status of the individual elements of The Greenway. However, it is suggested that a modification could be prepared to clarify the different elements shown on the policies map, and that the policy applies to all. (MM05a)
- d) The key for the map (and inset maps) includes ‘EN8 aspirational connections’ which are not referred to in the Plan. As such this appears to be a designation without policy basis. It is also unclear whether the aspirational connections are within the areas delineated by the broken lines, or along the route of the lines?**
- 12.4 The aspirational connections are within the areas delineated by the broken lines. Again, a modification could be proposed to explain the aspirational nature of the connections where opportunities to extend the Greenway will be explored. (MM05a)
- e) The Welland Valley Railway is shown on the map and key but does not appear to illustrate geographically the application of any particular policy in Plan?**
- 12.5 The Welland Valley Railway has the potential to contribute to The Greenway. However, in response to the question whilst it is proposed to identify its route on

Figure 8 to show the wider context, it is not proposed to include the Welland Valley Railway on the Policies Map.

f) On the Rushden and Higham Ferrers inset map there are three annotations relating to EN23 which are not referred to in the Policy. It is not clear if these are three of the designated local centres referred to in the Policy? If that is the case, given their annotation as a single point/marker, rather than as a boundary how will applicants determine if their proposals are within 200 metres of the centre?

12.6 The three annotations relating to EN23 listed as Blackfriars, Grangeway and Rushden East are local centres referred to in the policy. These are also listed in the bullet points under paragraph 7.72 of the Plan. Blackfriars and Grangeway are existing local centres whereas the Rushden East local centre will be developed as part of the SUE. The designations are shown as single points to provide the location of the local centres, applicants will need to measure the distance between the existing facilities at the local centre and their proposal to determine whether their proposals are within 200 metres of the centre.

g) On the keys for the inset maps the town centre boundaries and primary shopping frontage are attributed to Policy EN23. Should they relate to EN21 and/or EN22?

12.7 The town centre boundaries and the primary shopping frontages relate to Policy EN21. The keys for the inset maps will need to be amended to correct this. Primary shopping areas relate to Policy EN22. An update will be prepared to the policies map to correct the policy numbers shown in the key.

12.8 Policies EN21 and EN22 relate exclusively to the six town centres (Rushden, Higham Ferrers, Irthlingborough, Oundle, Raunds, Thrapston). Policy EN23 is entirely separate and relates exclusively to the designated Local Centres. This mutually exclusive differentiation is reflected in the Policies Map legend.

h) The sites shown on the map under Policy EN19 Protected Employment Areas are not identifiable by their address/reference number. They all appear simply as red boundaries.

12.9 The key includes a number in brackets for each area after the policy number, this number could be added to the maps to enable the Employment Areas to be identifiable by their address, this can be provided through a proposed modification.

i) The same is true of the housing allocations shown as block yellow including the Rushden East SUE and land to the east of the A6/Bedford Road. This needs to be rectified in the interests of effectiveness.

12.10 The housing allocations all have different policy numbers, these could be added to the policies map to enable them to be individually identified, again this could be achieved through a proposed modification.

j) The EN19 rural employment designation on the main map appears to include land outside the district. What is the justification for this and where is it explained?

12.11 The designation which shows land outside the boundary in the Rockingham Enterprise Area. This site is allocated for employment uses in the JCS, appendix 3 of the plan provides a summary of the details for each of the employment sites. The area shown outside the district has been shown in error, an amendment to the policies map will be proposed to correct this.

IQ13:

In this context, (responding to the Covid 19 restrictions) can the Council confirm whether any changes to the SCI are necessary?

13.0 The Council reviewed its SCI against Covid-19 lockdown restrictions when these came about, and it was not considered that any changes were needed to the SCI. The impacts of the Covid 19 pandemic are addressed in the *Statement of Consultation under Regulation 22 (March 2021)* submitted with the Plan, paragraphs 2.16 to 2.19 set out how consultation procedures were adapted to respond to the pandemic and associated restrictions. A similar approach could be taken should any further work on the document take place during periods when Covid 19 restrictions are in place.

IQ14:

Position statements to provide an update on the status of the SUEs in East Northamptonshire at Rushden East and Irthlingborough West would be helpful. These should draw on the updated monitoring information referred to under the Housing section of this letter.

14.0 The Council's response to IQ11(e) sets out the current position regarding Rushden East and Land east of the A6/ Bedford Road, Rushden (Policy EN28), including with reference to the delivery trajectories for these sites.

14.1 Regarding Irthlingborough West, little progress has been made in finalising S106 negotiations since preparation of the 1st draft version of the Plan during 2018. The Joint Core Strategy (Annex 1) anticipated delivery of the site in its entirety by the end of the current Local Plan period (2031). Since then, the trajectory has been progressively set back; such that the latest Annual Position Statement (1st April 2020; document G-02) sets an anticipated delivery of 200 dwellings (50 per year), with first units delivered during the 2027-28 monitoring period.

14.2 The uncertainty around the possible delivery rates for Irthlingborough West was a major factor in the decision, in 2019, to allocate an additional site (culminating in the allocation of Land east of the A6/ Bedford Road, Rushden (Policy EN28). Regulation 19 representations on behalf of promoters of alternative housing site allocations at Irthlingborough (Addington Road and Nene Park/ former Rushden & Diamonds FC stadium site) have questioned the overall strategy for meeting Irthlingborough's housing requirement, given the lack of certainty around deliverability (and even developability) of Irthlingborough West.

14.3 The latest trajectory (200 dwellings, by 2031) reflects these uncertainties/ concerns. This is a residual figure and represents the Council's ongoing commitment to seeing development at Irthlingborough West at some point in the future. A review of the

overall spatial strategy for Irthlingborough (including housing requirements, set at Joint Core Strategy Policy 29/ Table 5) is a matter for the forthcoming Strategic Plan review.

IQ15:

Although it is included as Figure 19 in the Plan, the policies map as submitted does not include a notation for the Irthlingborough West SUE allocated in the JCS. It would be helpful to me if a version of the map showing the boundary of this can be provided and added to the examination library.

- 15.1 The policies map does not contain a notation for the Irthlingborough West SUE as there is no policy reference in the Local Plan to this site. The site remains as an existing commitment as referenced in paragraph 9.15 of the JCS. Further Irthlingborough West is depicted on the key diagram of the JCS (page 34).
- 15.2 The extent of the site is shown in the accompanying map at Figure 19 in the Pre-Submission Draft Plan. [A plan is also included.](#)

IQ16:

Paragraphs 1.7 to 1.14 of the Plan will be out of date when the Plan is finalised for adoption. Figure 1 is also inaccurate in relation to “subsequent stages”. Please prepare potential MMs to ensure that this part of the Plan is sound.

- 16.1 Paragraphs 1.7 to 1.14 will be updated in advance of the Plan’s adoption through a further update to the initial Schedule of Proposed Modifications.