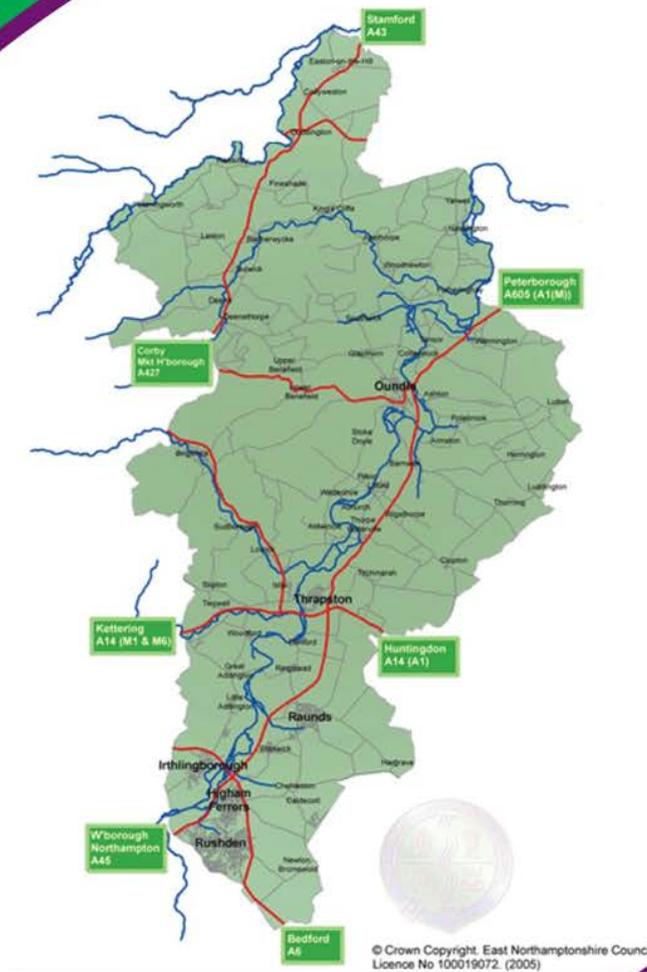




East
Northamptonshire
Council

Local Plan Part 2 (site specific policies) Regulation 18 Consultation



East Northamptonshire Local Plan

January 2017

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Links to other documents

Document	Link
National Planning Policy Framework (March 2012)	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
North Northamptonshire Joint Core Strategy 2011-2031 (adopted July 2016)	http://www.nnjpu.org.uk/docs/Joint%20Core%20Strategy%202011-2031%20High%20Res%20version%20for%20website.pdf
Other relevant development plan documents (current Local Plan Part 2/ Neighbourhood Plans)	http://www.east-northamptonshire.gov.uk/planningpolicy

Additional Comments to note

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Appendix 3: Evidence base – studies and assessments currently under preparation, or undertaken to date

Appendix 4 – Regulation 18 Consultation Form

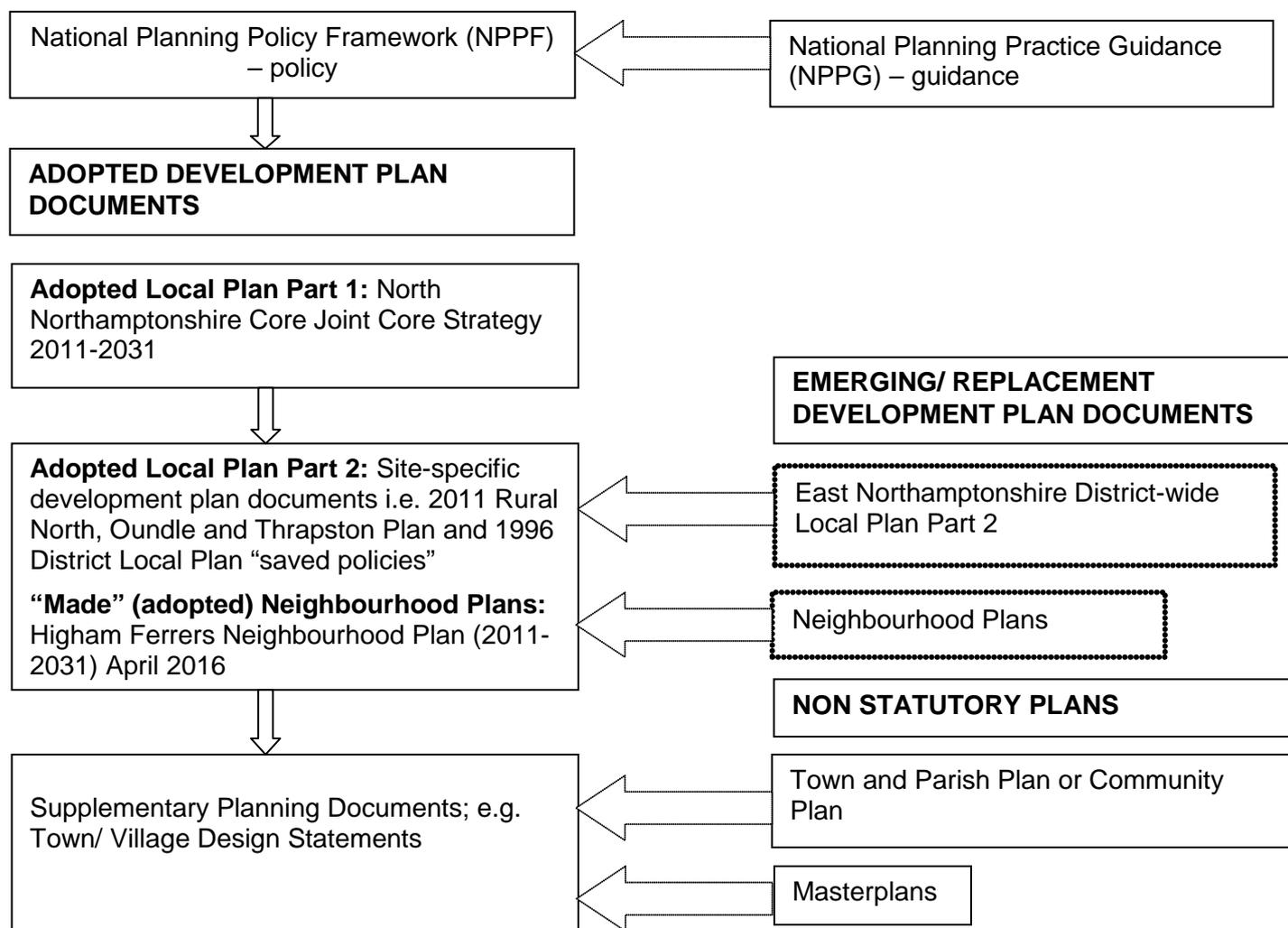
1.0 Introduction – Why is a “Local Plan Part 2” being prepared?

1.1 The statutory Local Plan for East Northamptonshire Council consists of two parts:

- **Strategic policies (Part 1)** – the North Northamptonshire Joint Core Strategy (JCS) 2011-2031, adopted in July 2016; and
- **Local (non-strategic) policies (Part 2)** – the East Northamptonshire Local Plan Part 2.

1.2 On 11 April 2016, the Council approved the preparation of the Local Plan Part 2 as a District-wide “site allocations” Development Plan Document (DPD¹). When adopted, the Plan will provide detailed non-strategic and/ or site specific policies which will support the strategic policies of the adopted JCS (Local Plan Part 1) up to 2031.

Figure 1: Planning policy documents



1.3 The preparation of the Local Plan Part 2 will be accompanied by the following statutory processes:

¹ A Glossary of terms and abbreviations is set out at **Appendix 1**

- Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), as required by the European Union SEA Directive and applied to English law through the Environmental Assessment of Plans and Programmes Regulations 2004
- Habitat Regulations Assessment (HRA), as required by the European Union Habitats Directive and 1994 Habitats Regulations (updated 2010)

Sustainability Appraisal/ Strategic Environmental Assessment (SA/ SEA)

- 1.4 The SA process (incorporating SEA) will help to identify the economic, social and environmental implications of policy options, as well as evaluating which of these represents the optimum, i.e. most sustainable, solution. SA forms a key element of evaluating an optimum option, though not the sole determining factor. Consultation on the SA “Scoping Report” will be undertaken at an early stage (by spring 2017) and will help to refine baseline information and sustainability objectives.

Habitat Regulations Assessment (HRA)

- 1.5 In April 2011, the Upper Nene Valley Gravel Pits, incorporating much of the Nene Valley within the District between Ditchford and Thorpe Waterville, was confirmed as a “Special Protection Area” (SPA) and “Ramsar” (Ramsar Convention, Criteria 5 and 6) site of international importance. The SPA/ Ramsar designation entails a specific process, consisting of initial HRA “screening” (i.e. testing whether a full Appropriate Assessment, sufficient to fulfil the HRA requirements, is required), followed by setting the “scope” for the HRA and, finally (if required), the undertaking of a full Appropriate Assessment of the impacts of those policies identified through the “scoping” process.
- 1.6 Consultation for both the SA and HRA is expected to take place alongside the various consultation stages for the Local Plan Part 2 itself.

2.0 Planning Policy Context

2.1 The adopted site specific Local Plan policies are contained within two DPDs, indicated below. These will be entirely replaced by the new Local Plan Part 2, upon adoption.

DPD

Rural North, Oundle and Thrapston Plan (RNOTP), adopted July 2011 (saved policies)

East Northamptonshire District Local Plan (DLP), adopted November 1996 (saved policies)

Coverage

The area of the District north of the A14, plus the parishes of Great Addington, Little Addington, Denford and Woodford

Now relates to saved policies for the Parishes of Higham Ferrers, Irthlingborough, Raunds, Rushden, Chelveston cum Caldecott, Hargrave, Newton Bromswold, Ringstead and Stanwick

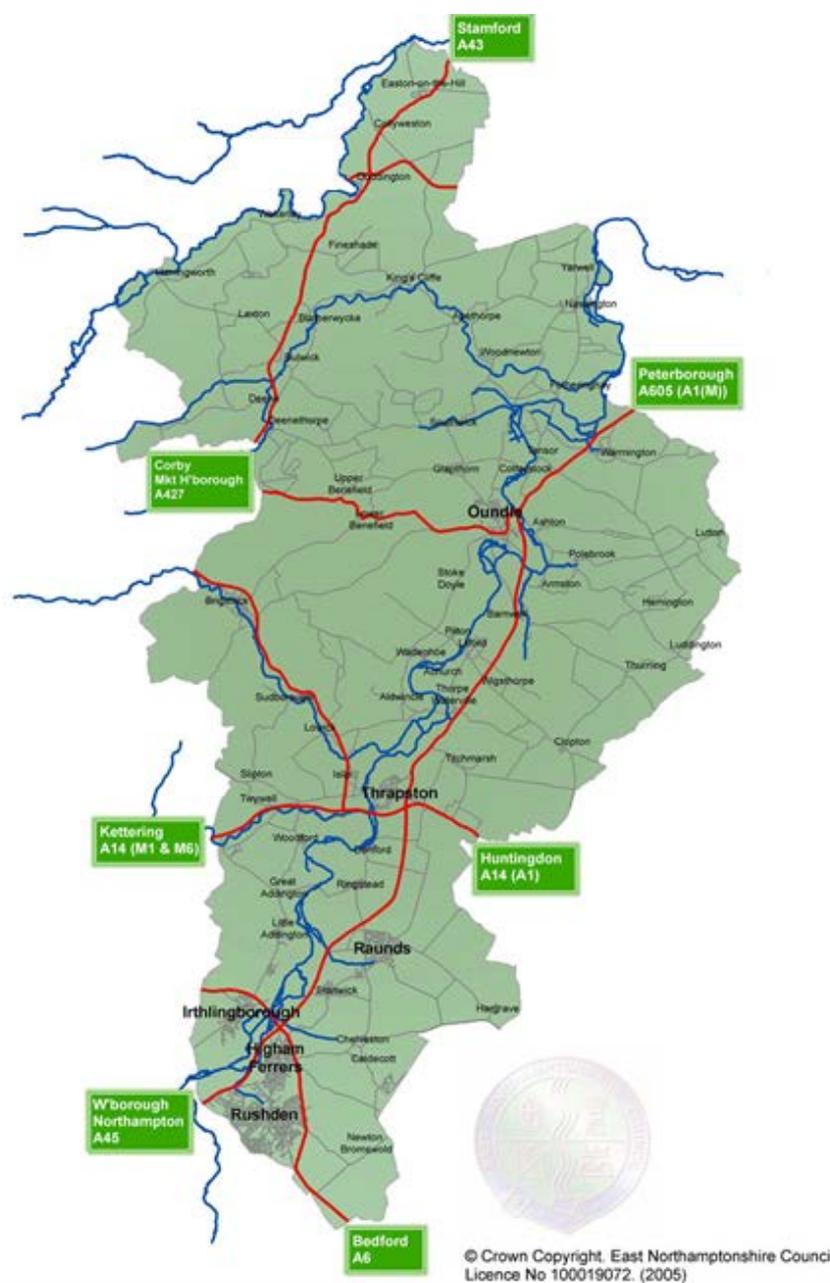


Figure 2: East Northamptonshire District: area to be covered by the Local Plan Part 2

Neighbourhood Plans

2.2 Across the District, as at January 2017 15 Neighbourhood Areas are designated, in each case with a view to preparing a Parish-wide Neighbourhood Plan². Of the 15 designated Neighbourhood Areas, 4 Neighbourhood Plans have passed submission stage:

- **Higham Ferrers Neighbourhood Plan 2011-2031** – “made” (adopted) by East Northamptonshire Council, 11 April 2016
- **Chelveston cum Caldecott Neighbourhood Plan 2016-2031** – Examiner’s report published 24 November 2016
- **Stanwick Neighbourhood Development Plan 2016-2031** – Regulation 16 consultation ended 7 November 2016, independent examination currently underway
- **Raunds Neighbourhood Plan 2011-2031** – submitted to East Northamptonshire Council on 11 November 2016, with consultation under the Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

2.3 The Chelveston cum Caldecott and Higham Ferrers Neighbourhood Plans, have passed examination, both have been produced as “mini” (Parish level) site specific DPDs for respective parishes. Four policies from the adopted 1996 District Local Plan remain in force for either or both of these Neighbourhood Areas, covering issues not addressed by the Local Plan Part 1 or the respective Neighbourhood Plans:

- **AG4:** Re-use and adaptation of buildings in the countryside – remains in place for Higham Ferrers, as Neighbourhood Plan policies do not cover the town’s rural hinterland;
- **AG9:** Replacement Dwellings in the countryside – remains in place for Chelveston cum Caldecott and Higham Ferrers as neither Neighbourhood Plan covers this matter;
- **RL3:** Recreational open space provision by developers and
- **RL4:** Children’s Play Areas – policies RL3 and RL4 remain in place for Chelveston cum Caldecott, as these set Local Plan thresholds for open space/ recreational developer contributions, issues not covered by that Neighbourhood Plan.

2.4 By contrast, the submission version Neighbourhood Plans for Raunds and Stanwick do not contain development land allocations. The Raunds Neighbourhood Plan focuses upon regeneration of the town, but includes site specific policies for the town centre (primary/ secondary shopping areas), protected open space/ Local Green Space and protected employment areas. The Stanwick Neighbourhood Plan sets out detailed local development management policies for the built environment, transport, heritage/ historic environment and local infrastructure, with site specific designations for open space and the built up area.

2.5 The NPPF specifies that “*Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation*” (paragraph 185). In other words, the Part 2 Local Plan must work to complement the emerging and completed Neighbourhood Plans. In the cases of Chelveston cum Caldecott and Higham Ferrers most matters that would otherwise be covered by the Local Plan Part 2 are already addressed by the respective Neighbourhood Plans.

² <http://www.east-northamptonshire.gov.uk/neighbourhoodplanning>

However Raunds and Stanwick may still require some additional policy direction through the Local Plan Part 2, for matters not covered by the JCS (Local Plan Part 1) or Neighbourhood Plans.

Integrating Neighbourhood Plans with the Local Plan Part 2

It is proposed that individual Local Plan Part 2 policies should exclude Neighbourhood Areas for which these matters are addressed by policies within a “made” (adopted) Neighbourhood Plan.

Further Neighbourhood Plans will be individually assessed to determine what (if any) Local Plan Part 2 policies would still be needed for the relevant designated Neighbourhood Area, as and when Plans come forward.

3.0 Plan Process

- 3.1 The process for preparing statutory DPDs, including the Local Plan Part 2, is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 represents the first (statutory) stage in the process of preparing the Local Plan Part 2. This is the “scoping” stage of the DPD process; where East Northamptonshire Council (ENC) consults the public and other key stakeholders as to the scope of the Plan and what it should contain.
- 3.2 The Council has identified a range of themes and topics that the Local Plan Part 2 is likely to include (see below). In practice therefore, the Regulation 18 consultation will enable the set of themes and priorities to be further defined.

4.0 Guiding plan preparation

- 4.1 The Local Plan Part 2 will be guided by the broader strategic framework (see Figure 1, above):
 - **National planning policies** – National planning policy is set out in the National Planning Policy Framework (NPPF), published March 2012. This is supported by the Planning Practice Guide (PPG).
 - **North Northamptonshire Joint Core Strategy 2011-2031, adopted 14 July 2016** – The JCS (Local Plan Part 1). The Local Plan Part 2 will be guided by specific JCS policy “hooks”.
- 4.2 Like the Core Strategy (JCS), the Local Plan Part 2 will be a spatial document. It may be necessary to provide further local detail; in combination with a Neighbourhood Plan (where these are being prepared).
- 4.3 It will define:
 - Vision and Outcomes for the District;

- Local spatial development strategies – especially in respect of the rural area, where individual villages are not explicitly considered through the JCS (Local Plan Part 1);
- Development management policies – where further detail is deemed necessary, over and above JCS (Local Plan Part 1) policies;
- Site specific policies – environmental designations, e.g. green infrastructure projects and proposals;
- Site specific policies – land allocations for housing and community facilities, e.g. non-strategic housing sites, detailed proposals in respect of strategic development sites; and
- Site specific policies – economic land allocations, e.g. safeguarded employment areas, town centres.

4.4 It should be noted that the Core Strategy contains criteria-based development management policies alongside strategic development policies, such as infrastructure delivery mechanisms, Housing and job creation targets are also set out through the Core Strategy. The Local Plan Part 2 will **not** therefore cover these matters.

5.0 Draft structure

5.1 The framework for preparing “spatial” Local Plans was established through the Planning and Compulsory Act 2004. This divided Local Plan preparation into two main parts: the Core Strategy (Part 1) and site specific policies (Part 2). Site specific development plan documents (DPDs) can be prepared either as a single District-wide Plan or by preparing two or more sub-District “Area Action Plans” or other site specific Plans.

Background to the East Northamptonshire Local Plan

5.2 Around 2005, the Council resolved to sub-divide East Northamptonshire into separate sub-areas for the purpose of preparing site specific DPDs, to reflect the extensive spatial (social, economic and environmental) differentiation between different areas of the District. Under this arrangement, the RNOTP was successfully prepared and adopted in July 2011, giving full Local Plan coverage to most of the geographic area of the District (i.e. north of the A14). Following adoption of the RNOTP, in 2012 the Council formally launched the Four Towns Plan, to cover the predominantly urban southern part of the District.

5.3 Since 2012, a range of evidence gathering and background work for the Four Towns Plan has been undertaken through the work of the Four Towns Plan Working Party.

5.4 A Council decision was taken to prepare a District wide Plan in April 2016; however, whilst the Council resolved to discontinue the Four Towns Plan, it is considered that the draft structure presents a good starting point for the new Local Plan Part 2. The Regulation 18 statement therefore provides an opportunity to develop that work in a District wide context.

5.5 The approach to setting out the structure for the Four Towns Plan is compared to that of the recently adopted JCS at **Appendix 1** (below). Both structures are broadly similar, although there are some differences; e.g. the position of the overall spatial strategy,

compared to development management (“protecting assets”) policies, and the relative positions for housing and economic policies.

Q1 Options for the draft Local Plan Part 2 basic framework and structure:

Should the Local Plan Part 2:

- a) provide the same structure as that developed through the former Four Towns Plan structure, or:
- b) propose amendments to the Four Towns Plan structure, to more closely reflect the adopted North Northamptonshire JCS (Local Plan Part 1) structure?

6.0 Introductory sections and overarching spatial approach

6.1 As for the Core Strategy and previous versions of the Local Plan Part 2, it is proposed that the District-wide Local Plan Part 2 comprises of the following introductory sections:

1. **Introduction** – Procedural matters, e.g. plan context, legal compliance (Duty to Cooperate, Strategic Environmental Assessment, Habitat Regulations Assessment etc);
2. **Area Portrait** – Geographical and historic background to the District;
3. **Vision and Outcomes** – Distinctive aspirations, expanding upon the JCS Vision & Outcomes (Local Plan Part 1), to give clear direction and promote sustainable development.

6.2 The Core Strategy provides the spatial/ strategic context for the Local Plan Part 2 (paragraph 2.56); it recognises the spatial differences between the rural north and predominantly urban southern parts of the District. Previously, through earlier approaches to policy development, the Council set out to develop separate and distinctive visions for each of the sub-areas. For the distribution of housing, the Core Strategy (Local Plan Part 1) retains a sub-division between the Four Towns and that covered by the Rural North, Oundle and Thrapston Plan (RNOTP). (JCS paragraph 9.10). There may be a case to continue this approach, or alternatively, it could be more appropriate to develop a new Vision and proposed outcomes for the Local Plan Part 2.

6.3 The RNOTP includes coverage for the villages of Great and Little Addington (“the Addingtons”). However, it must be noted that these settlements are closely related to Irthlingborough, which provides the closest and most accessible urban centre for the two villages. It may be appropriate to recognise their proximity to, and spatial relationship with, the town.

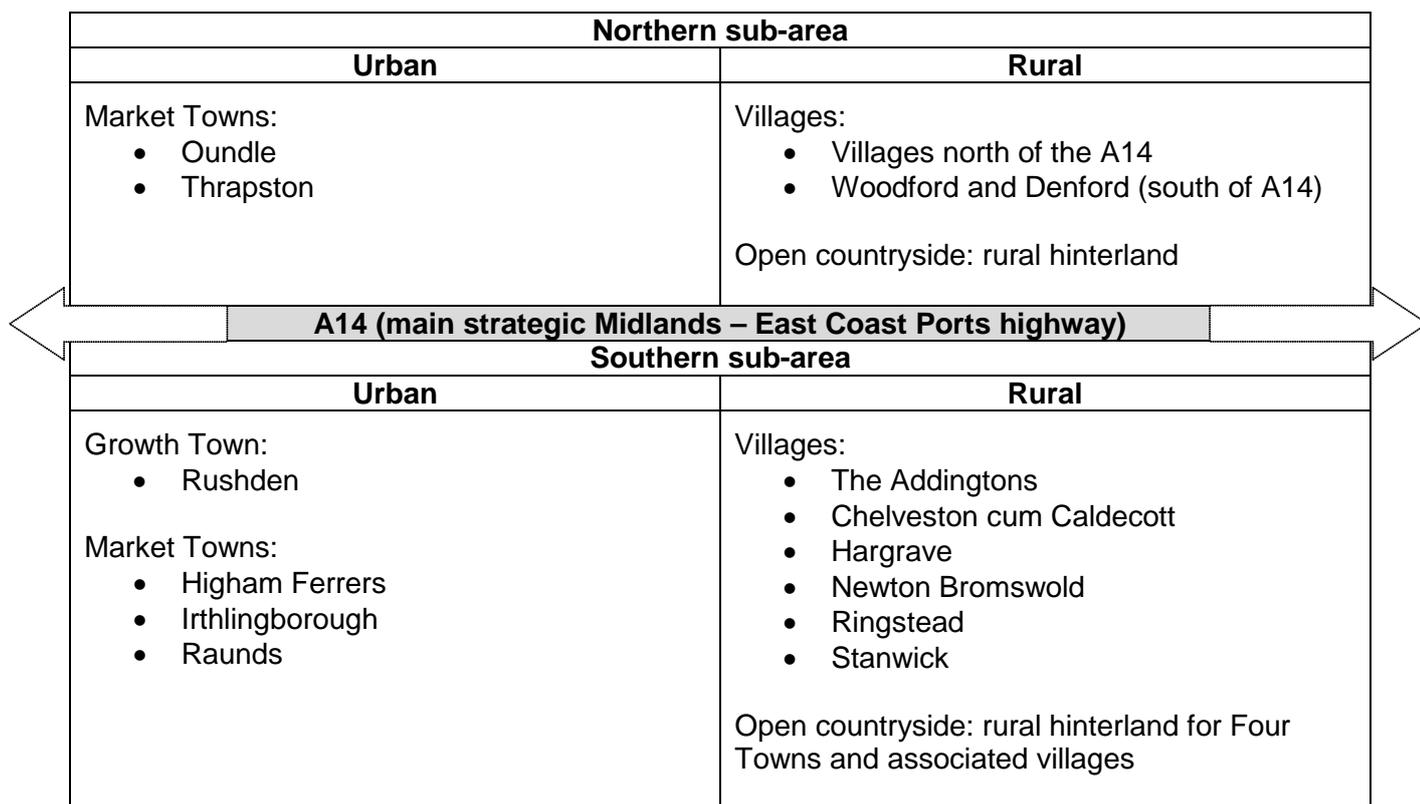
6.4 The Core Strategy (Figure 15, extract below) identifies distinct northern and southern functional sub-areas. The northern sub-area focuses upon Corby and Kettering, and includes Oundle and Thrapston. The southern sub-area focuses upon Rushden and Wellingborough, and includes Higham Ferrers, Irthlingborough and Raunds.



Figure 3: Functional sub-areas of North Northamptonshire (taken from the Joint Core Strategy)

6.5 Figure 4 (below) shows the overall spatial development strategy applied to the East Northamptonshire context. The Local Plan Part 2 will need to consider, more closely, the overall spatial strategy at District-level.

Figure 4: functional sub-areas, applying JCS Figure 15 and Policy 11 sub-divisions



Q2 Vision and Outcomes

In developing the Vision and Outcomes should the primary emphasis of the Local Plan Part 2 be to provide:

- a) An urban-rural distinction, in accordance with JCS Policy 11(1) and 11(2) respectively; or**
- b) Further spatial division, identifying separate northern and southern/ urban and rural sub-areas, as per Figures 2 and 3, above?**

7.0 Presumption in favour of sustainable development and spatial development strategy

Presumption in favour of sustainable development

7.1 The NPPF sets out the Government’s views, as to what constitutes “sustainable development”. It includes a “presumption in favour of sustainable development”; described as a “golden thread” running through plan-making (paragraph 14). This ranges from local issues such as the protection of individual heritage or community assets through to global issues such as climate change. A local iteration of the presumption in favour of sustainable development is set out in the Local Plan Part 1 (JCS Policy 1).

Q3 Presumption in favour of sustainable development

The JCS contains specific direction in applying the presumption in favour of sustainable development to the Local Plan (Policy 1). Is it necessary to provide additional local distinctiveness through a District-level presumption in favour of sustainable development?

If so, are there any are there any specific local issues that need to be addressed; e.g. implications of climate change in a local context?

Spatial development strategy (settlement hierarchy)

- 7.2 Defining a robust spatial development strategy is considered to represent a fundamental element of the Local Plan. The Core Strategy defines four spatial categories (Table 1: Spatial Roles and through Policy 11) as follows:
- **Growth Towns** – including Rushden –the focus for major coordinated regeneration and growth
 - **Market Towns** – including Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston – providing a service role for the local community and rural hinterland
 - **Villages** – containing community infrastructure and services to meet day to day needs
 - **Open Countryside** – the living/ working countryside, including small settlements of a dispersed form
- 7.3 The Core Strategy contains a distinctive spatial strategy for Higham Ferrers, providing a localised convenience and service role. This is in recognition of Higham’s close proximity to, and spatial relationships with, Rushden. The spatial role for Higham Ferrers differs to that of the other freestanding Market Towns.
- 7.4 The Core Strategy (paragraph 5.12) gives the opportunity for the Local Plan Part 2 to provide for a more detailed rural settlement hierarchy. Four distinct rural spatial categories were proposed through earlier work undertaken in respect of the Four Towns area:
- **Larger freestanding villages**; e.g. those >1000 population;
 - **Smaller freestanding villages** – those <1000 population,
 - **Urban periphery** – urban outliers such as ribbon developments, which have a rural setting and are physically separate to the main built up area, but closely related;
 - **Open countryside**- generally defined as land beyond settlement limits
- 7.5 The RNOTP (Policy 1), supplementing the 2008 Core Spatial Strategy, contained a detailed rural settlement hierarchy as follows:
- **Rural Service Centres** – Oundle and Thrapston;
 - **Local Service Centre** – King’s Cliffe;
 - **Smaller Service Centres** – Nassington and Warmington;
 - **Category A Network Villages** – Villages with infill development boundaries;

- **Category B Network Villages** – Villages without defined infill development boundaries;
- **Open Countryside** - generally defined as land beyond settlement limits

7.6 This settlement hierarchy, previously developed for the RNOTP, is superseded by JCS Policy 1, which sought to simplify the spatial strategy (settlement hierarchy). Arguably, the detailed RNOTP settlement hierarchy could be considered as overly complicated. Furthermore, there is no practical difference between Category B Villages and the Open Countryside, given that the NPPF sets a general presumption in favour of permitting the conversion and re-use of rural buildings for residential development (NPPF paragraph 55).

7.7 Whilst it is considered that there is a strong case for the Local Plan Part 2 to recognise the vast variations in the population and character of the 53 defined rural settlements within the District, the RNOTP approach (depicting 5 settlement categories) is thought to be overly complicated.

Q4 Is there a need for the Local Plan Part 2 to expand upon the overall JCS spatial strategy for rural villages (Policy 11(2))?

If so, would a typology of settlements consisting of larger freestanding villages, smaller freestanding villages and urban periphery be appropriate, or are there any other suitable alternative approaches?

Settlement boundaries

7.8 Managing development pressures around the periphery of settlements has long been a challenging issue for the planning system. Differentiation between built up areas, the rural hinterland and open countryside is a central principle of the planning system.

7.9 The JCS reinforces this approach. In particular, Policy 11 (Network of Urban and Rural Areas) places a firm distinction between urban areas (Policy 11(1)) and rural areas (Policy 11(2)). The Local Plan Part 2 must acknowledge this, and define a suitable approach to enable a practical differentiation between built up areas (i.e. established settlements) and their surrounding rural hinterlands.

7.10 The settlement boundaries for the majority of settlements were defined through the RNOTP and designated through the various adopted inset Proposal Maps in that Plan. Settlement boundaries are currently designated for the following settlements:

- Oundle and Thrapston – defined as Rural Service Centres in the previous Local Plan, now designated as Market Towns in the new JCS (Local Plan Part 1);
- Service villages – King’s Cliffe, Nassington and Warmington, now designated as Villages in the new JCS;
- Category A Network Villages – the majority of villages within the RNOTP area.

7.11 The Higham Ferrers Neighbourhood Plan provides a written definition, to differentiate between the urban and rural parts of the Parish. The emerging Neighbourhood Plan for Raunds does not propose a settlement boundary, to differentiate between the urban area and rural periphery, to be shown on the policies map. By contrast, the emerging

Neighbourhood Plans for Chelveston cum Caldecott and Stanwick have both proposed linear settlement boundaries.

- 7.12 The JCS allows for either the designation of village boundaries and/ or detailed settlement boundary criteria to be developed through Part 2 Local Plans and/ or Neighbourhood Plans.
- 7.13 The JCS highlights the function of settlement boundaries, as “*a tool to plan positively for growth and to prevent ad-hoc encroachment into open countryside, particularly for villages located close to larger settlements where coalescence is a concern*” (paragraph 5.18). The designation of linear boundaries is a solely site specific (i.e. non-strategic) matter. Given the potential challenges that the designation of boundaries for a large number of settlements pose, this is a matter that could lend itself well to Neighbourhood Plans, within a generic Local Plan framework.

Q5 What is the preferred approach for distinguishing between built up areas and the surrounding rural hinterland:

- a) Delete previous Local Plan “red line” settlement boundaries for settlements in the Rural North (RNOTP) area, and replace these with a detailed new criteria-based policy that could also allow for Neighbourhood Plans to designate settlement boundaries;**
- b) Comprehensively review previous settlement boundaries and designate new boundaries , where appropriate, or**
- c) Consider town and village settlement boundary definitions separately; e.g. define linear boundaries for urban areas only, using a criteria-based approach for villages?**
- d) Are there any other possible approaches to consider?**

8.0 Historic and built environment

- 8.1 The JCS recognises the distinction between designated and non-designated heritage assets (paragraphs 3.14-3.15). The former enjoy statutory protection through Historic England’s listings and associated legislation. However, the JCS recognises the importance of Local Lists, in providing a positive way to identify non-designated heritage assets against consistent criteria (paragraph 3.15).
- 8.2 While the JCS supports the principle of preparing a Local List, it does not contain any specific policy “hook”, whereby an approved Local List of non-designated heritage assets could be connected to the Local Plan Part 1. Instead, JCS Policy 2 sets out generic development management criteria for protecting and enhancing the historic environment.
- 8.3 The RNOTP contains a bespoke “Buildings or Local Architectural or Historic Interest” Policy (Policy 9), with a Local List attached to this (RNOTP Appendix 3). Given this previous approach, the Local Plan Part 2 has the potential to adopt a similar methodology. However, as RNOTP Policy 9 pre-dates the NPPF, it is considered that there is scope to review this approach.

Q6

What approach should the Local Plan Part 2 apply, in respect of ensuring appropriate protection and safeguarding for non-designated heritage assets:

- a) Designate locally listed heritage assets through the Local Plan Part 2; or**
- b) Apply a criteria based local listings policy, to enable individual non-designated heritage assets to be designated through a Supplementary Planning Document or Neighbourhood Plans?**

Town centre regeneration

- 8.4 The JCS Vision highlights the importance of delivering “*regenerated and thriving market towns*” within East Northamptonshire. Spatial policies within the JCS set out the approach to town centre regeneration (policies 11 and 12), emphasising a “*growth in homes and jobs to support regeneration and local services*” (Policy 11(2) (b)).
- 8.5 There is a longstanding presumption in favour of redeveloping brownfield sites within existing urban areas. The Government has sought to reiterate this, through the development of a statutory Brownfield Register of sites, whereby potential development sites listed on the Register would benefit from planning permission “in principle”; i.e. a new consent status, between a Local Plan allocation and outline permission. While the Government promotes the use of the Brownfield Register as one means of boosting housing delivery, this approach could raise questions around the practical effectiveness of allocating regeneration sites through the Local Plan.
- 8.6 The JCS also seeks that Rushden town centre (Growth Town) should adapt and diversify, in order to operate successfully alongside the Rushden Lakes development (Policy 12(d)). It also emphasises the need to support the development of town centre uses within the centres of the five Market Towns (Policy 12(f)).
- 8.7 Over the past decade, the Council has sought to deliver town centre regeneration through the preparation of various masterplans. While these have delivered some success, such as streetscape enhancements, they have tended to focus upon large scale regeneration proposals; incorporating various interconnected major redevelopment proposals.
- 8.8 In the case of Thrapston, RNOTP Policy THR3 defines site specific town centre regeneration proposals; although to date none of these have been delivered. Nevertheless, other significant regeneration schemes at Thrapston have been/ are being delivered; particularly Castle Court retirement scheme (opened April 2016) along with renovation of the listed 71-75 High Street, as two retail units together with a number of dwellings.
- 8.9 The former print works site at Church Street, Irthlingborough is the most significant vacant town centre regeneration opportunity within the District. A mixed use retail/residential development, was recently approved, although construction work is yet to start.

Town centre regeneration opportunity sites

Former print works site, Church Street, Irthlingborough – In the event that the currently consented scheme is not implemented, it is proposed that the former print works site, Church Street, Irthlingborough be allocated as a priority town centre regeneration site.

Thrapston Regeneration Sites (RNOTP Policy THR3) – Opportunities for regeneration sites around Thrapston should be reviewed through the Local Plan Part 2.

Q7 **Over and above the opportunity sites at Irthlingborough and Thrapston identified above; are specific regeneration proposals necessary given the presumption in favour of the brownfield development in town centres?**

If so, are there other possible town centre regeneration sites that could be allocated through the Local Plan Part 2?

Re-using rural buildings and redevelopment in the open countryside

- 8.10 The NPPF and Local Plan Part 1 (JCS) contain a range of policies supporting the conversion and re-use of rural buildings. The JCS contains specific criteria based policies regarding Rural Exceptions housing and rural economic development (policies 13 and 25 respectively).
- 8.11 Pre-dating the NPPF and JCS, the RNOTP contains a detailed criteria-based Rural Buildings policy (Policy 23). This policy remains following the adoption of the JCS, as it is considered to add value to the new JCS policies 13 and 25.
- 8.12 The RNOTP and 1996 District Local Plan also include saved policies for replacement dwellings in the open countryside (policies 24 and AG9, respectively). These issues are not covered within the JCS. Therefore, RNOTP Policy 24 and District Local Plan Policy AG9 have been retained but should be reviewed through the Local Plan Part 2 in order to ensure that these are NPPF compliant, and remain “fit for purpose”.

Q8 **In reviewing RNOTP policies 23 and 23, and District Local Plan Policy AG9, are there any further policy criteria that need to be applied, to ensure they are fit for purpose and are NPPF compliant?**

9.0 Open space and green infrastructure

Open space, sport and recreation site designations

- 9.1 The Local Plan Part 1 contains a significant number of spatial policies regarding the delivery of green infrastructure and the protection of existing local open spaces. The range of policies regarding open space and green infrastructure is extensive; reflecting the varied functions that green spaces have.

- 9.2 The RNOTP includes open space, sport and recreation site designations (Policy 15). Furthermore, the Local Plan Part 1 (JCS paragraph 3.88) sets out specific provision and criteria for the protection of open spaces through the Local Plan Part 2 and/ or Neighbourhood Plans.
- 9.3 The RNOTP Policy 15 designations were underpinned by the PMP Open Space, Sport and Recreation Strategy (January 2006)³. This earlier study will be replaced by the KKP Open Space and Playing Pitch Strategy Assessments, Standards and Action Plan, which will be finalised early in 2017. The KKP assessment will provide the primary evidence to support delivery and secure provisions/investment for Playing Pitches and identify deficiencies and surpluses in existing and future provision of open space
- 9.4 To date, the Neighbourhood Plans that have been published (Higham Ferrers, Chelveston cum Caldecott, Raunds and Stanwick) have all proposed to designate open space provision.

Q9 What approach should the Local Plan Part 2 apply, in respect of ensuring appropriate protection for open space, sport and recreation sites:

- a) Review existing, and designate new, open space, sport and recreation sites, with reference to the KKP assessment; or
- b) Set a criteria based development management policy to protect open space, sport and recreation sites?

Local Green Space

- 9.5 The NPPF has also introduced a new national enhanced protected open space category; Local Green Spaces (LGS). This designation will enable green spaces of particular local importance to be designated through the Local Plan Part 2 or Neighbourhood Plans to be protected, through ruling out new development other than in very special circumstances (NPPF paragraph 76).
- 9.6 Higham Ferrers and Chelveston cum Caldecott Neighbourhood Plans both designate LGS sites. The Raunds Neighbourhood Plan (1st draft, October 2015) proposes the designation of two categories of protected open space, with a small number of sites having the enhanced LGS protection. By contrast, the Stanwick Neighbourhood Plan (1st draft, March 2016) does not propose designating LGSs. Instead, it has chosen to designate “Areas of Important Open Space”; a continuation of the former (now defunct) District Local Plan Policy EN20.
- 9.7 The NPPF explicitly recognises that either the Local Plan Part 2 and/ or Neighbourhood Plans could designate LGS sites. This is reflected in the Local Plan Part 1 (JCS paragraph 3.89), thereby enabling two potential policy approaches to be considered.

³ http://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=265

Q10 What approach should the Local Plan Part 2 apply to the designation of Local Green Space:

- a) Designation through the Local Plan Part 2; or
- b) Setting out detailed criteria through the Local Plan Part 2 (e.g. in respect of defining “an extensive tract of land), to allow for the designation of sites through Neighbourhood Plans?

Green infrastructure

- 9.8 The designation of green infrastructure links is facilitated through the Local Plan Part 1 (JCS). The JCS (Policy 19/ Figure 17) already includes a network of strategic sub-regional and local green infrastructure corridors. The designation of sites through the Local Plan Part 2 and/ or Neighbourhood Plans could provide a mechanism by which green infrastructure corridors may be implemented. The RNOTP has applied a similar approach, through the designation of linear green infrastructure links (RNOTP Policy 4) and proposals for new Local Nature Reserves (Policy 10).
- 9.9 The JCS is also supported by the North Northamptonshire Green Infrastructure Delivery Plan (GIDP)⁴, May 2014. This identifies a range of strategic green infrastructure projects across the District. The JCS already contains a substantive policy framework for delivering green infrastructure, although this does allow for the designation of more detailed green infrastructure corridors where appropriate (JCS paragraphs 7.6 and 7.14).
- 9.10 Further work and assessment has been undertaken across Northamptonshire that considers existing green infrastructure and ecosystem assets across a range of natural resources. This work covers a vast range of environmental matters, namely access, biodiversity/ geodiversity, the historic environment, landscape and open space. This evidence has proved beneficial in identifying local corridors or clusters of assets, through “opportunity mapping”.

Q11 What approach should the Local Plan Part 2 take to reviewing existing green infrastructure policies and projects:

- a) Review the site specific green infrastructure proposals (RNOTP policies 4 and 10);
- b) Consider that the Local Plan Part 1 green infrastructure policies (JCS policies 19-21) provide sufficient direction for the effective implementation of green infrastructure projects; or
- c) Are there any other opportunities to create local green infrastructure corridors?

Trees and ecosystem services

- 9.11 The JCS has enhanced earlier green infrastructure policies; e.g. through embracing the concept of “ecosystem services”. This concept, highlighted within JCS Policy 1 (Presumption in favour of sustainable development), recognises the broader social and

⁴ http://www.nnjpu.org.uk/docs/7. Appendix_1_full_GIDP_June_2014.pdf

economic (as well as environmental) benefits of effective green infrastructure proposals in delivering sustainable development.

- 9.12 One particular example of local ecosystem services are trees and/ or local landscape character areas identified through conservation area appraisals or town/ village design statements. Protected trees (i.e. those designated by Tree Preservation Orders or within conservation areas) are covered by specific legislation, which recognises their particular importance within the planning system. Protected or other trees of local value may offer a broad range of sustainability (environmental, social or economic benefits):
- Place shaping – trees are important in making safe and pleasant streets, delivering socio-economic benefits such as quality of life and improved public health;
 - Historic environment – trees have a major function in defining the character and setting of heritage assets;
 - Landscape – trees play a critical role in developing effective structural landscaping for new developments;
 - Biodiversity – trees function as key habitats for many native flora and fauna;
 - Climate change – trees are a key means in mitigating issues of climate change, such as CO₂ reduction or in developing sustainable drainage systems.
- 9.13 Given the wide range of benefits that trees may offer, the Local Plan Part 2 could include additional policy direction as to the particular function and status of trees as ecosystem services. Alternatively, it must be noted that the Core Strategy already includes extensive policy direction regarding the vast range of functions of trees; i.e. landscape (Policy 3), biodiversity (Policy 4), flood risk management (Policy 5), public open space (Policy 7), place shaping (Policy 8), green infrastructure (policies 19 and 20) and site specific allocations (policies 27, 33 and 35).
- 9.14 Overall, the Local Plan Part 2 must recognise that the JCS already contains a wide range of policies relating to both ecosystem services and green infrastructure. Indeed, the specific importance of ecosystem services, underpinning all aspects of sustainable development, is emphasised in JCS Policy 1. The Local Plan Part 2 must therefore consider whether further bespoke detailed Local Plan policy direction is necessary.

Q12 What approach should the Local Plan Part 2 apply to support the delivery of ecosystem services,:

- a) Seek protection of valued trees (individual and groups) through the development management process;**
- b) Identification of priority areas for developing multiple ecosystem services; and/ or**
- c) Any other possible approaches?**

Landscape designations

- 9.15 Alongside strategic green infrastructure proposals, the JCS (Policy 3(f) and paragraph 5.7) provides opportunities for the Local Plan Part 2 to designate the following landscape area typologies:

- Further areas of tranquillity, over and above the King's Cliffe Hills and Valleys Landscape Character Area designated through JCS Policy 3(f);
- Strategic gaps, to maintain the separate identities of settlements, through preventing coalescence (JCS paragraph 5.7).

9.16 The submission Stanwick Neighbourhood Plan proposes the designation of a site specific strategic gap between the village and Raunds, so as to maintain separation between the two settlements. However, regarding the designation of areas of tranquillity, it may be impractical for Neighbourhood Plans to designate such areas, given that they would cover several parishes. Therefore, the Local Plan Part 2 may provide the only practical forum for which additional areas of tranquillity could be designated.

Q13 What approach should the Local Plan Part 2 apply to making landscape designations:

- a) Designation of areas to prevent coalescence of settlements;**
- b) Designation of additional areas of tranquillity; or**
- c) Consider any other possible typologies of landscape character designations?**

Renewable energy

9.17 The matters of landscape sensitivities and impacts are a particular concern in respect of developing renewable energy schemes. In part this reflects the practical reality, that larger schemes can only be realistically developed in open countryside locations. In some cases the most effective locations for developing wind turbines or solar farms are also the most sensitive landscapes.

9.18 To address these concerns, the Joint Core Strategy already contains a detailed criteria based development management policy for renewable energy schemes (Policy 26). East Northamptonshire Council has already sought to provide additional local guidance, through the Wind and Solar Energy Supplementary Planning Document (SPD), adopted September 2014. The SPD is underpinned by detailed Landscape Sensitivity Studies, regarding wind turbines and solar panels respectively⁵. It may, however, be appropriate to consider whether further direction could be given by way of the Local Plan Part 2.

Q14 Would it be appropriate to develop a more detailed Local Plan Part 2 policy for renewable energy developments, to give further direction over and above the adopted JCS Policy 26?

⁵ http://www.east-northamptonshire.gov.uk/site/scripts/documents_info.php?documentID=66&pageNumber=15

10.0 Housing

Housing requirements

- 10.1 The latest housing land supply figure for East Northamptonshire is 5.96 years, as at 1 April 2016, (agreed by the Planning Policy Committee on 21 November 2016)⁶. The JCS housing requirement for Higham Ferrers, Irthlingborough, Raunds and Thrapston through to 2031 has already been met; by way of completions, existing commitments (planning permissions, resolutions to grant and/ or development plan allocations), specific brownfield sites or specific emerging development plan allocations (Land East of Ferrers School and Rushden East).
- 10.2 The agreed residual housing requirement, considered by the Full Council on 11 April 2016, was based on the 2015 AMR, although it is noted that similar calculations using the 2016 AMR would be likely to yield similar findings. This highlights that the following strategic residual housing requirements need to be addressed through Local Plan Part 2 site allocations:
- Rushden – **363 dwellings**
 - Oundle – **208 dwellings**
 - Rural areas – **220 dwellings**
- 10.3 The Local Plan Part 1 (JCS paragraphs 9.10 and 9.12) provides for the Local Plan Part 2 and/ or Neighbourhood Plans to make further site allocations to meet any residual shortfall in supply at individual locations. Both Rushden and Oundle are designated Neighbourhood Areas, although to date the respective draft Neighbourhood Plans have not yet been published. It is anticipated that both areas would seek to allocate smaller housing sites, in addition to the large strategic Rushden East sustainable urban extension proposal (JCS Policy 33). Given this uncertainty and the need to ensure that the Local Plan meets “*the full, objectively assessed needs for market and affordable housing*” (NPPF paragraph 47), the Local Plan Part 2 would need to allocate land to meet these strategic requirements.
- 10.4 The NPPF also allows for the Local Plan to include a windfall allowance. In the rural area, 600 of the total 820 dwellings (73%) are already committed. On this basis, if rural windfalls deliver 15 dwellings per year this would be sufficient to fulfil the remaining rural requirement. A windfall allowance of 41 dwellings per year was agreed by the Planning Policy Committee on 21 November 2016 based on historic delivery rates of small sites (those less than 5 dwellings).

⁶ Item 6, Appendix 2: http://www.east-northamptonshire.gov.uk/meetings/meeting/725/planning_policy_committee

Summary – Local Plan Part 2: housing requirements

It is proposed that the Local Plan Part 2 should take the following approach to the allocation of housing land:

- Allocation of additional land for a further **350 dwellings** at Rushden, in addition to the Rushden East sustainable urban extension;
- Allocation of additional land for a further **200 dwellings** at Oundle;
- No further housing land allocations required for Higham Ferrers, Irthlingborough, Raunds and Thrapston, as these Market Towns have sufficient completions and commitments to meet their respective JCS housing requirements;
- No further rural housing land allocations required for the rural area, which would be expected to come forward through small scale windfall developments.

10.5 In many cases, Neighbourhood Plans are already providing opportunities to allocate additional non-strategic housing land allocations. Smaller site allocations have already been made in the Chelveston cum Caldecott Neighbourhood Plan, while it is anticipated that other emerging Neighbourhood Plans may similarly make smaller scale housing land allocations.

Housing mix and tenure

10.6 The Local Plan Part 1 (JCS Policy 30) sets out detailed strategic requirements regarding housing size, mix and tenure. It does, however, make provision for the Local Plan Part 2 and/ or Neighbourhood Plans to consider setting more detailed local policies and/ or standards regarding:

- Specific local requirements for particular locations, to meet local needs and aspirations (JCS paragraphs 9.18, 9.19, 9.22);
- Affordable housing allocations (JCS paragraph 9.40);
- Category 3 (wheelchair-accessible) housing, National Accessibility Standards (JCS paragraphs 9.43-9.46/ Policy 30(c));
- Specialised housing requirements, e.g. designated, sheltered and/ or extra-care schemes (paragraph 9.42/ Policy 30(f));
- Site allocations, to accommodate individual and community custom-build developments (JCS paragraphs 9.47-9.50/ Policy 30(g)).

10.7 Opportunities for developing more detailed local housing standards may be identified through the Local Plan Part 2. The Council has recently undertaken detailed local assessments regarding housing mix and tenure, using the latest Strategic Housing Market Assessment (SHMA), 2011 Census data and 2014 population estimates:

- Housing Strategy 2012-2017 – over 5,800 (17%) of households contain at least one person classed as “vulnerable”;
- Projections for the number of older people in the District show that over the next 15 years there will be an estimated increase of 25% more 55-64 year olds and 86% increase of those aged 75-84;
- East Northamptonshire Housing Mix Requirements Assessment (March 2016) – includes survey data regarding needs and aspirations for specialist housing;

- Ward Level Housing Mix Requirements Assessment (March 2016) – assessing the implications of the District Wide Requirements Assessment, using ward area Census data, and taking into account local characteristics and variations.

10.8 The Local Plan Part 2 will need to consider the extensive existing data regarding housing aspirations, needs, mix and tenure. Consideration needs to be given as to whether there is a need for the Local Plan Part 2 to incorporate further local standards. For example, it is important that the housing mix can address this change in demographic and that the Part 2 Plan recognises this in policy.

Q15 Does JCS Policy 30 set sufficiently detailed local standards for housing size, mix and tenure; or are there any additional local standards that could be included within the Local Plan Part 2, such as:

- **Sub-District requirements, such as at a ward and/ or settlement level;**
- **Bespoke local standards for Category 3 (wheelchair-accessible) housing, if/ where there is evidence of a demonstrable need; or**
- **A specific development management policy covering older persons' accommodation and, if so, what should this include?**

Specialist housing provision

10.9 The JCS (policies 11 and 30) makes provision for the Local Plan Part 2 to include site specific allocations for specialist housing types and/ or tenures. This is supported by the East Northamptonshire Housing Mix Requirement Assessment, which highlights a need to make additional provision for specialist older persons' accommodation. If there is evidence that one or more locations (settlements) or sites are available, it may be appropriate to consider allocating land through the Local Plan Part 2, as specified by JCS policies 11(2) and 13(2)).

10.10 JCS Policy 30(g) makes provision for developing custom build houses. The JCS supports such proposals which accord with the spatial strategy set out in JCS Policy 11 (paragraph 9.50). However, in the case of Deenethorpe Airfield the Local Plan Part 1 goes further than this by way of a specific criterion, allowing: "*Opportunities for bespoke individual and community custom-build projects including self-build housing subject to the design code*" (JCS Policy 14(f)(iii)).

Q16 Should the Local Plan Part 2 propose site allocations for affordable or specialist housing schemes, such as:

- **Self/custom build housing**
- **Provision to develop specialist housing for specific groups, such as older people; or**
- **Bespoke individual and community development projects?**

If so, what evidence is already available or would need to be collected?

Gypsies, travellers and travelling show people

- 10.11 The Local Plan requirement for providing pitches for Gypsies, travellers or travelling show people for the first 11 years of the Plan period (2011-2022) is set out in JCS Table 7. This identifies a small residual need for pitches, based on the 2011 Gypsy and Traveller Accommodation Assessment (GTAA). The Core Strategy states that the study may need updating to ensure that a robust evidence base is maintained (paragraph 9.52).
- 10.12 The GTAA identifies a small residual need for additional pitches, between 2011 and 2022. In all cases, however, this falls below the thresholds for minor (i.e. non-strategic) developments:
- Residential pitches – 7 additional pitches ;
 - Transit pitches – 3 additional pitches ;
 - Travelling show people plots – 4 additional pitches ,
- 10.13 There are currently two Gypsy/ traveller sites within East Northamptonshire; at Ringstead (Denford Road) and Irthlingborough (Station Road). There is also a show peoples' storage site at Polebrook.
- 10.14 The JCS provides a specific policy "hook": "*Where necessary, Part 2 Local Plans will allocate further sites for accommodation for gypsies, travellers and travelling show people*" (Policy 31). Given the scale of need, future proposals could be assessed through JCS Policy 31.

Q17 Does JCS Policy 31 provide sufficient direction to determine applications relating to gypsies, travellers or travelling show people?

Are there any suitable sites for gypsies, travellers or travelling show people?

11.0 Town centres and retailing

Defining boundaries and primary shopping areas

- 11.1 The JCS (Policy 12(a)) and NPPF (paragraph 23) both require that the Local Plan Part 2 should include site specific designations for town centre boundaries and/ or primary shopping areas. This has implications for the six town centres within the District.

Table 1: Adopted development plan town centre designations

Town Centre	Designated town centre boundary	Designated primary shopping area	Development plan document/ policy reference
Higham Ferrers	✓	✓	Higham Ferrers Neighbourhood Plan 2011-2031, "made" (adopted) April 2016 (HF.TCE1)

Town Centre	Designated town centre boundary	Designated primary shopping area	Development plan document/ policy reference
Irthlingborough	X	✓	Primary shopping frontage designated through District Local Plan, adopted November 1996 (Policy S5)
Oundle	✓	✓	Town centre boundary and defined shopping frontage designated through RNOTP, adopted July 2011 (Policy 18)
Raunds	X	✓	Primary shopping frontage designated through District Local Plan, adopted November 1996 (Policy S5) . Proposed linear town centre/ primary shopping area, submission Raunds Neighbourhood Plan (Policy R9)
Rushden	X	✓	Primary shopping frontage designated through District Local Plan, adopted November 1996 (Policy S5)
Thrapston	✓	✓	Town centre boundary and defined shopping frontage designated through RNOTP, adopted July 2011 (Policy 18)

11.2 In respect of the defined town centres Higham Ferrers has a recently adopted “commercial area” boundary and primary shopping frontages (Neighbourhood Plan Policy HF.TCE1). Oundle and Thrapston have town centre boundaries and defined shopping frontages designated through the RNOTP, these policies are dated and will require refreshing either through the Local Plan Part 2 or relevant Neighbourhood Plans. Defined shopping frontages for Irthlingborough, Raunds and Rushden are retained through the 1996 District Local Plan (Policy S5); again, these will require updating as above.

11.3 The submission Raunds Neighbourhood Plan (November 2016) proposes a draft linear town centre, divided into primary and secondary shopping areas. Irthlingborough and Rushden do not have designated town centre boundaries.

Higham Ferrers: town centre boundary and primary shopping frontage allocated through Higham Ferrers Neighbourhood Plan, “made” (adopted) April 2016

The recently adopted Neighbourhood Plan includes a defined town centre boundary and primary shopping frontage with a detailed policy framework.

Emerging approaches to defining town centre boundaries and primary shopping areas, where Neighbourhood Plans are under preparation

Raunds town centre:

The submission Neighbourhood Plan includes linear (rather than zonal) town centre designations (primary and secondary shopping areas).

Irthlingborough, Oundle and Rushden town centres

- Irthlingborough – The emerging Neighbourhood Plan for the town is at an early stage of preparation. Therefore, unless draft town centre boundaries and primary shopping frontages are proposed through the Neighbourhood Plan it will be necessary for the Local Plan Part 2 to include these designations.
- Rushden and Oundle – 1st draft versions of the Neighbourhood Plans are expected to be published for consultation during 2017. Dependent upon specific proposals, it may be appropriate for the emerging Rushden and Oundle Neighbourhood Plans to take the lead in defining town centre boundaries and primary shopping areas. The approach that the Local Plan Part 2 will take is therefore dependent upon the proposals contained in these Neighbourhood Plans.

Thrapston: Neighbourhood Plan not under preparation

As Thrapston is not currently designated a Neighbourhood Area for Neighbourhood Planning, it will be necessary for the Local Plan Part 2 to review the town centre boundaries and primary shopping areas, currently defined by RNOTP Policy 18.

Q18

Are the recommended approaches above, for the designation of town centre boundaries and primary shopping areas for each of the towns, appropriate?

Or, should the Local Plan Part 2 undertake any further boundary assessment?

Town centres and retail – managing town centre development

11.4 Over and above the NPPF requirement for Local Plans to designate town centre boundaries and primary shopping areas, there are other possible considerations for managing development within town centres. JCS Policy 12 sets out the overall Local Plan retail strategy, although the Local Plan Part 2 may provide opportunities to develop more detailed policies, both for managing development within the town centres and primary shopping areas, and the development of main town centre uses beyond the town centres. The NPPF defines main town centre uses as:

- Retail – Class A1
- Leisure, entertainment and culture (i.e. cinemas, restaurants, drinking establishments, health/ fitness centres, museums, hotels, conference centres etc) – classes A3, A4, A5, D1 and D2
- Offices – classes A2, B1(a)

- 11.5 A review of recent applications for main town centre uses has revealed three matters of particular concern:
- Over-concentration of single uses; e.g. hot food takeaways (Class A5 use), betting shops or payday lenders, and the impacts of this upon the overall vitality and viability of town centre uses;
 - Loss of existing town centre retail units and businesses to other, non-town centre uses such as residential; and
 - Managing impacts of main town centre uses beyond the six town centres.
- 11.6 Management of retail development, other main town centre uses and the town centres; has long presented major challenges for the planning system. The Local Plan Part 2, supporting the overall framework provided by JCS Policy 12, should focus upon providing an effective policy framework to address these concerns.

Mix of businesses and uses within the town centres

- 11.7 Securing an appropriate range of business is a key aspect of maintaining the character and vitality of town centres. Each town centre faces its own range of challenges, although the impact of changing patterns of shopping and leisure (e.g. online retailing or changes to the night-time economy) are common to all town centres.
- 11.8 Since 2006, there have been over 30 applications for the change of use of assorted town centre businesses to fast food takeaways (Class A5) across the District. Many of these have proved controversial, with some subject to appeal. Concerns around increases in the prevalence of fast food takeaways (i.e. maintaining an appropriate mix and range of main town centre uses) relate to environmental matters such as litter, noise and smells; and issues relating to health and wellbeing.
- 11.9 These concerns must be balanced with corporate priorities. The Corporate Plan requires the Council to promote economic growth and policies should, where appropriate, support the overall economic growth objectives.
- 11.10 Fast food takeaway provision was considered through the Higham Ferrers Neighbourhood Plan, and highlighted a need to increase and diversify the range of local shops and services within that town centre. This outcome was addressed through specific development management criteria for Higham Ferrers town centre: *“That hot food takeaways (A5 Use Class) do not represent more than 10% of the total occupied units, with no more than two A5 units being located adjacent to each other and there being no less than two non A5 units between a group of hot food takeaways”* (Policy HF.TCE1).

Loss of main town centre uses from the town centres

- 11.11 The Raunds Neighbourhood Plan 2011-2031 (submitted November 2016) focuses upon maintaining the vitality and viability of the existing town centre and highlights concerns about the loss of existing retail units to non-town centre uses; particularly residential.
- 11.12 Raunds Town Council also sought to challenge acute local impacts of the permitted development regime; i.e. the loss of existing retail units from the primary shopping area (Brook Street). Following on from this, the Raunds Neighbourhood Plan has proposed

policy interventions to secure retention of existing businesses within the main town centre (primary shopping area).

- 11.13 Beyond respective Neighbourhood Plan policies for managing particular types of use within the Higham Ferrers and Raunds town centres, there are practical limitations that restrict how far the planning system can manage changes of use of individual premises away from main town centre uses. Policies could however be applied to cover the excessive prevalence of a single class/ type of main town centre uses. These could also look to address concerns about the loss of town centre business premises to other (non-town centre) uses.

Q19 How can the Local Plan Part 2 maintain an appropriate mix and balance of uses within the town centres, so as to maintain their vitality and viability?

Would a more detailed “saturation” policy, to avoid an over-concentration of single types of businesses/ uses, be appropriate?

Managing the impacts of main town centre uses beyond the town centres

- 11.14 The application of the national impact test (NPPF paragraph 26 and JCS Policy 12(g)) provides a further possible mechanism by which the development of main town centre uses can be assessed. The NPPF and JCS Policy 12(g) require that proposals for main town centre uses that are being promoted outside the town centres should be supported by an impact assessment, to assess the effects upon potentially affected town centres.
- 11.15 The NPPF, supported by JCS Policy 12(g), sets a threshold of 2,500m²; below which proposals for the development of main town centre uses beyond the six town centres do not require an impact test. To set this in context, all of the recently constructed or consented convenience retailers (supermarkets/ superstores) within the District fall below the national (2,500m²) threshold.

Recent proposal or development scheme	Location	Gross floorspace (m ²)
Aldi, Attley Way	Irthlingborough	1254
Former Express Works site, Church Street	Irthlingborough	930 (main store)
Waitrose, 66 East Road	Oundle	2203
Asda, Warth Park Way	Raunds	1372
Sainsbury, 100 High Street South	Rushden	372
Lidl, Newton Road	Rushden	2250

- 11.16 The NPPF allows for lower floorspace thresholds to be set locally. As the JCS does not propose any variation to the national default threshold this could be considered through the Local Plan Part 2. In 2015 the possibility of setting local impact test thresholds was considered. The following standards were suggested:

- **100m²** threshold floorspace for the Market Towns, recognising acute concerns expressed by Raunds Town Council regarding the loss of smaller retail units (<150m²) from that town centre (Primary Shopping Area);
- **500m²** threshold for Rushden, acknowledging its Growth Town status and in recognition of the statutory “Sunday trading law” (maximum 280m²) floorspace.

Q20 Should the Local Plan Part 2 consider setting local thresholds?

- a) If so, would the possible 100m² and 500m² thresholds above be appropriate;
- b) Could individual threshold standards be set for each of the six town centres; or
- c) Are there any other possible approaches?

Local centres

11.17 The JCS makes provision for “*Part 2 Local Plans and Neighbourhood Plans [to] identify additional development opportunities where these do not undermine the focus of retail development at the town centres*” (Policy 12(f)). The JCS also allows for the creation of new local centres in association with the development of sustainable urban extensions (Policy 12(g)).

11.18 In view of this overarching JCS policy framework (Policy 12), one approach could be to propose the designation of local retail centres; (i.e. smaller groups of convenience retailers and/ or other main town centre uses, not regarded as town centres, but considered to represent appropriate locations for smaller scale main town centre uses).

11.19 Within the southern part of the District the Four Towns Plan Working Party previously recommended designating local centres for Raunds and Rushden. These could be designated to safeguard convenience retailing or neighbourhood shopping areas around the urban areas. It was also recommended that central hubs for main town centre uses and community facilities at Ringstead and Stanwick (the two largest villages within the District) could be designated as local centres.

Q21 Do you agree with the proposal that local centres be designated at Raunds, Rushden, Ringstead and Stanwick?

Should any further local centres be proposed?

12.0 Employment areas

Existing employment areas

12.1 Major employment related developments came forward, in accordance with the previous Local Plan Part 1 (2008 Core Spatial Strategy). The importance of growth is reiterated by the new Local Plan Part 1. Significant economic growth has taken/ is taking place as follows:

- Primark, east of Islip Furnace, Kettering Road, Islip – warehousing;
- Warth Park, Raunds – predominantly warehousing
- Rushden Lakes – retail and leisure.

12.2 Major/ strategic employment related developments are consented and/ or committed through the Local Plan Part 1 as follows:

- Irthlingborough West;
- West End, Raunds;
- Rockingham Motor Racing Circuit Enterprise Area (JCS Policy 27);
- Rushden East sustainable urban extension (JCS Policy 33);
- Nene Valley Farm, Rushden (JCS Policy 35).

12.3 The JCS also recognises the need to ensure that existing employment areas are safeguarded, unless it can be demonstrated that there is no reasonable prospect of the site being used for that purpose (paragraph 8.8/ Policy 22). The JCS does not however identify existing employment protection areas.

12.4 Existing employment areas are already designated through the current Local Plan Part 2 (RNOTP Policy 16). The evidence base for these designations is some 10 years old and would require updating)) The Higham Ferrers and Chelveston cum Caldecott Neighbourhood Plans allocate defined employment protection areas (“Existing Employment Areas”) in accordance with JCS Policy 22. The draft Raunds Neighbourhood Plan similarly proposes the designation of protected employment areas.

Q22 Which employment areas do you consider should be protected through the Local Plan Part 2?

Are there any existing employment areas that are in need of enhancement?

Potential to allocate further employment land allocations

12.5 The JCS (Policy 23(d)) requires the allocation of new employment sites to deliver 7,200 jobs within the District up to 2031. Whilst major sites have already delivered/ are expected to deliver in excess of this requirement the JCS makes provision for further non-strategic sites (of less than 5 ha) to be allocated through the Local Plan Part 2.

12.6 The following typologies of future development employment development sites have been identified:

- Town centre regeneration sites at Irthlingborough and Thrapston (section 8.0, above);
- Other possible regeneration sites; e.g. Nene Park/ Nene Business Park (Irthlingborough East) and wet and dry leisure centres, Rushden (Splash Pool and Pemberton Centre respectively);
- Existing Local Plan employment land allocations (RNOTP).

12.7 The current Local Plan includes a number of existing land allocations for employment use that are still to be delivered, which will need to be reviewed through the new Local Plan Part 2:

- Riverside Hotel, Oundle (Policy 20);
- Kingsmead Small and Medium Enterprises Site, King’s Cliffe (Policy KCF1);
- Brigstock Camp (Policy BC1);

- Addington Park Industrial Estate, Little Addington (Policy AP1).

Q23 Should current Local Plan employment land allocations be reviewed, to ensure that they are “fit for purpose” to contribute towards delivery of the JCS jobs target?

Are there any further sites that could be allocated for employment uses?

13.0 Culture and community facilities

Tourism and culture

- 13.1 The JCS includes an extensive policy framework for tourism related development. JCS policies focus upon the importance of green infrastructure corridors; in particular the Nene Valley, Ise Valley and Rockingham Forest (policies 19-21). The economic importance of tourism and cultural assets is emphasised by JCS Policy 22(e), while Policy 25 relates to rural diversification.
- 13.2 The Council also has a range of corporate level policies to support tourism related development, in particular:
- **Corporate Plan Objectives 2016-19** – promotion of tourism as one aspect of regeneration and economic development, through initiatives such as Destination Nene Valley and the East Northamptonshire Greenway;
 - **Draft East Northamptonshire Economic and Tourism Strategy 2017-2020⁷** – emphasis upon increasing tourist spending and job creation along the Nene Valley.
- 13.3 The Council has a proactive approach to tourism generation. The JCS also contains a substantive policy framework for promoting tourism. It is necessary, however, to consider whether the Local Plan Part 2 should provide more detail than the adopted spatial strategy in setting distinctive local tourism policies, such as site specific proposals.
- 13.4 One matter where the Local Plan Part 2 could contain more specific local detail relates to the possible loss of rural tourist accommodation to permanent residential use. Recent relaxations to permitted development rights and national policy (NPPF paragraph 55) regarding the change of use of existing buildings within rural areas to permanent dwellings may have the potential to undermine the supply of tourist accommodation within the District. Previous tourism strategies highlighted the limited tourist accommodation offer within the District compared to potential from the day-visitor market. Proposals to enhance tourist accommodation (e.g. promoting cycling breaks) could be considered in greater detail through the Local Plan Part 2.

⁷ Item 12: http://www.east-northamptonshire.gov.uk/meetings/meeting/731/policy_and_resources_committee

Q24 Is there a need for the Local Plan Part 2 to include additional policy direction for tourism related development; e.g. protection of the supply of tourist accommodation?

Should the Local Plan Part 2 prioritise tourism-related development?

Community infrastructure

- 13.5 The JCS (Policy 7) contains an overall development management policy, to support and enhance community services and facilities. This supports the protection of all community facilities and public open space. It is further supported by legal mechanisms such as the Community Right to Bid introduced through the 2011 Localism Act; e.g. nominating Assets of Community Value.
- 13.6 It may be appropriate to provide further local detail in respect of JCS Policy 7; e.g. through the designation of individual priority sites and/ or locations in the Local Plan Part 2. This may take the form of nominating specific high quality facilities and/ or public open space of particular importance, which could benefit from enhanced protection through the Local Plan Part 2. Alternatively, such detailed local considerations may be better addressed through Neighbourhood Plans, although the KKP Open Space Assessment could provide an overarching evidence base for this matter to be covered by the Local Plan Part 2.

Q25 Would it be appropriate for the Local Plan Part 2 to designate specific high quality protected community facilities and/ or public open space?

Health and wellbeing

- 13.7 Promoting healthy communities is an overarching national core planning principle; improving health, social and cultural wellbeing, and delivering sufficient community and cultural facilities to meet local needs (NPPF paragraph 14). Many of these benefits could be delivered through green infrastructure enhancements or improved community facilities; providing increased opportunities for people to pursue more active lifestyles.
- 13.8 The Local Plan Part 2 should also recognise the more conventional concerns, regarding pressures upon the National Health Service; both primary and secondary healthcare infrastructure (GP surgeries/ outpatients clinics and hospitals, respectively). JCS Policy 7 provides the overall development management framework to protect local healthcare facilities, while Policy 10 supports the delivery of further infrastructure through development contributions. It may be appropriate to identify areas where the health service is suffering acute/ localised pressures, such that new developments would need to contribute directly to the delivery of improved facilities. The Infrastructure Delivery Plan may provide the start point for developing such an evidence base.

Q26 Could the Local Plan Part 2 look to identify priority areas where additional intervention would be necessary to enhance and protect health infrastructure?

14.0 Site specific allocations – Housing and Employment

14.1 As well as making strategic site allocations, the JCS provides guidance for allocating specific sites through the Local Plan Part 2 as follows:

- Job target (Policy 23/ Table 3) – 7,200 jobs, 2011-2031;
- Housing requirements (Policy 28/ Table 4) 8,400 dwellings, 2011-2031.

14.2 In the case of the jobs target, much of this has already been/ will be delivered through major employment developments that have recently been implemented or are under construction; e.g. Primark (east of Islip Furnace), Rushden Lakes and Warth Park (Raunds). Similarly, the following settlement specific housing requirements (JCS Policy 29/ Table 5) are already exceeded, by way of completions and commitments:

- Higham Ferrers (560),
- Irthlingborough (1,350),
- Raunds (1,060) and
- Thrapston (680).

14.3 There are still, however, several outstanding issues with respect to site specific land allocations, that need to be addressed through the Local Plan Part 2:

1. **Rushden East (JCS Policy 33) – Site allocation –site specific boundary to be defined through masterplanning;**
2. **Additional housing land allocations at Rushden, to meet residual requirement (approximately 350-360 dwellings, 2016-2031);**
3. **Additional housing land allocations at Oundle, to meet residual requirement (200-210 dwellings, 2016-2031);**
4. **Comprehensive development proposals for the Irthlingborough East (Nene Park/ Nene Business Park) employment area;**
5. **Deenethorpe Airfield Area of Opportunity (Policy 14) – Site allocation –site boundary to be defined through masterplanning.**

Rushden East

14.4 Rushden East is the principal sustainable urban extension within the District (JCS Policy 33). It will deliver 2,500 dwellings (1,600 dwellings by 2031), supported by an equivalent number of jobs, community infrastructure and green infrastructure. The JCS defines an indicative “*broad strategic location*” for the Rushden East sustainable urban extension (paragraph 10.20), but does not make a site specific allocation.

14.5 A framework for ensuring the successful preparation of a masterplan to enable the development to come forward has been established, through the Rushden East Project Board. The Local Plan Part 2 will need to identify any further detailed policy direction that is not already covered by JCS Policy 33.

Q27 Is further policy direction required to ensure the successful implementation of the Rushden East sustainable urban extension?

Rushden – other site specific housing allocations

- 14.6 As stated, the successful implementation of the Local Plan is dependent upon the delivery of the large strategic urban extension at Rushden East. The principle of Rushden East is set out in the JCS (Policy 33). However, the JCS assumes that only 1600 dwellings are likely to come forward by 2031 at Rushden East. Further housing land will therefore be required to meet the JCS target of 3,285 dwellings by 2031 (Policy 29/ Table 5).
- 14.7 Recent monitoring data identifies a need to allocate land at Rushden for around 350-360 dwellings to deliver the residual requirement for the remainder of the Local Plan period (2016-2031). The emerging Rushden Neighbourhood Plan is proposing to allocate housing sites, although it is as yet unclear about the number of dwellings that these sites are expected to deliver. To be sound, the Local Plan Part 2 and/ or Rushden Neighbourhood Plan will need to include a systematic objective site assessment of all additional potential site allocations around Rushden.

Q28 Are there any further sites in and around the Rushden urban area that could be allocated to deliver the outstanding Local Plan requirement for 350-360 dwellings by 2031?

Oundle – site specific housing allocations

- 14.8 For Oundle, the current Local Plan Part 2 includes sufficient housing land allocations up to 2021. Further housing allocations of around 200-210 dwellings are required for the period, 2021-2031.
- 14.9 The RNOTP (paragraph 8.18) identified potential longer term growth for the town, as set out below:

Sites	Approx Capacity
Land to the rear of the Cemetery, Stoke Doyle Road	230 dwellings
Land off Cotterstock Road/ St Peter's Road	200 dwellings

- 14.10 Work is currently progressing on a Neighbourhood Plan for Oundle, with the draft Plan anticipated during 2017. The emerging Neighbourhood Plan is proposing to allocate additional housing sites. To be sound, the Local Plan Part 2 and/ or Oundle Neighbourhood Plan will need to include a systematic objective site assessment of all potential site allocations proposed within the town.

Q29 Depending on need, are the two RNOTP potential longer term sites appropriate to be allocated through the Local Plan Part 2?

Are there any other sites around the town that could be allocated to deliver the outstanding Local Plan requirements for 200-210 dwellings by 2031?

Irthlingborough East employment area

- 14.11 The Irthlingborough East employment area (Nene Park/ Nene Business Park) has recently been considered through the development management process as a major potential employment site. It is not, however, covered by the Local Plan Part 1 (JCS). Therefore, the Local Plan Part 2 should seek to fill this policy vacuum, through providing clear direction for guiding future development proposals.
- 14.12 Recent redevelopment proposals have tended to come forward in a piecemeal manner; a reflection of the complicated planning history affecting the different land parcels within the area. The development of a comprehensive redevelopment masterplan, directed through the Local Plan Part 2, could be seen as an important matter for the Local Plan to address.

Q30 Should the Local Plan Part 2 provide a site specific policy for securing comprehensive redevelopment for the Irthlingborough East employment area (Nene Park/ Nene Business Park)?

Deenethorpe Airfield

- 14.13 The JCS (Policy 14) makes provision for the development of a new 'garden village' at Deenethorpe Airfield. This will consist of around 1,250 dwellings, associated employment and community facilities. The development would be in addition to (over and above) the JCS strategic housing requirement (8,400 dwellings).
- 14.14 The JCS itself does not allocate Deenethorpe Airfield for development. Instead, it makes specific provision for this site to be allocated through the Part 2 Local Plan or other site specific development plan documents (paragraph 5.54). Masterplanning work to date indicates that the built up area for the proposed Garden village would only occupy a relatively small part of the whole airfield.

Q31 What further policy direction is required to support the implementation of the Deenethorpe Airfield garden village?

15.0 Site allocations: contingency sites

- 15.1 The JCS contains a monitoring framework, with triggers and contingencies (Table 9). One matter of concern discussed during the JCS Examination hearing sessions (November 2015) was the possibility of including a contingency supply of development sites to address potential housing land supply implications, should the major housing requirements proposed through the sustainable urban extension fail to come forward in accordance with the JCS housing trajectory.
- 15.2 The current Local Plan (RNOTP) has taken this approach. In addition to the potential longer term/ contingency housing sites at Oundle, a further site with development potential of up to 250 dwellings capacity has been identified at Springfield Farm,

Thrapston (RNOTP paragraph 9.2), although current commitments are more than sufficient to meet the JCS target for that town.

- 15.3 In practice, the JCS endorses the earlier RNOTP approach; i.e. there may be a case for the Local Plan Part 2 to allocate further land to ensure that the supply of deliverable housing and employment sites is maintained throughout the Plan period. It may be that other deliverable sites are identified through the “call for sites” which could boost the local jobs or housing land supply. However, it may be preferable for the Local Plan to delegate the allocation of such development sites to Neighbourhood Plans.

Q32 Should the Local Plan Part 2 consider contingency site allocations?

16.0 Existing evidence – work undertaken to date

- 16.1 Since the decision was taken to proceed with the Local Plan Part 2 robust evidence gathering and updating work has taken place. A list of evidence base projects that have been completed or are underway is included at **Appendix 3**.

Q33 Do the studies and baseline information) listed at Appendix 3 provide a robust evidence base for the Local Plan Part 2?

Is there any other evidence base needed to support the Local Plan Part 2?

17.0 Policy outcomes – themes and topics to be covered by the Local Plan Part 2

- 17.1 The Local Plan Part 2 will be prepared within the broader statutory strategic policy framework; defined by national and Core Strategy policies. The Council also has its own corporate policies and priorities that need to be taken into account by the Local Plan Part 2. The policy issues to be addressed by the Local Plan Part 2 are set out below.

Policy Issues	Links to Corporate Plan Outcomes
<ul style="list-style-type: none"> • Site-specific Vision and outcomes for District area 	<ul style="list-style-type: none"> • Good quality of life: Prosperous, Sustainable, Healthy • Effective partnership working • Effective management • Knowledge of our customers and communities
<ul style="list-style-type: none"> • Local spatial development strategies – especially in respect of the rural area, where individual villages are not explicitly considered through the JCS (Local Plan Part 1) 	<ul style="list-style-type: none"> • Good quality of life: Prosperous, Sustainable • Knowledge of our customers and communities
<ul style="list-style-type: none"> • Development management policies – if further detail is deemed necessary, over and above JCS (Local Plan Part 1) policies 	<ul style="list-style-type: none"> • Good quality of life: Sustainable • Effective management
<ul style="list-style-type: none"> • Site specific policies – environmental designations, e.g. green infrastructure projects and proposals 	<ul style="list-style-type: none"> • Good quality of life: Sustainable, Clean, Healthy, Safe • Effective partnership working
<ul style="list-style-type: none"> • Site specific policies – land allocations for housing and community facilities, e.g. non-strategic housing sites, detailed proposals in respect of strategic development sites; and 	<ul style="list-style-type: none"> • Good quality of life: Prosperous, Sustainable, Healthy, Safe • Effective partnership working • Knowledge of our customers and communities
<ul style="list-style-type: none"> • Site specific policies – economic land allocations, e.g. safeguarded employment areas, town centres 	<ul style="list-style-type: none"> • Good quality of life: Prosperous, Sustainable • Effective partnership working

Q34 These policy issues have been identified with reference to policies within the JCS (Local Plan Part 1). Are there any other themes, topics or subjects that the Local Plan Part 2 should include?

If so, what evidence base exists to support them?

18.0 Timetable for the Local Plan Part 2

- 18.1 The timetable for the Local Plan Part 2 is set out in the recently approved Local Development Scheme (LDS). This will take the Local Plan Part 2 forward to 2031 and it is anticipated that the Plan will be adopted in 2019.
- 18.2 The JCS (Local Plan Part 1) and NPPF define the parameters for the Local Plan Part 2. Also, where Neighbourhood Plans are in preparation it is expected that the Local Plan Part 2 will complement these emergent Neighbourhood Plans.

19.0 How to get involved?

- 19.1 Consultation and stakeholder engagement form integral aspects of the development planning process at all stages. East Northamptonshire Council has produced a range of “good practice” guides, in order to maximise the effectiveness of community engagement and consultation throughout the Local Plan Part 2 process. Key guidance documents are:
- **North Northamptonshire Statement of Community Involvement (SCI), adopted December 2013⁸**
 - **East Northamptonshire Consultation and Engagement Strategy 2014-17⁹**
- 19.2 Regulation 18 sets out the statutory (i.e. minimum) consultation requirements. However, it is recommended that a wider engagement process should be undertaken, in accordance with the guidelines set out in these documents.

20.0 Regulation 18 consultation: setting the scope for the Local Plan Part 2

- 20.1 The Regulation 18 consultation will take place over 6 weeks; from Friday, 27 January 2017 to Friday 13 March 2017. All responses and comments to this consultation will feed into the overall process of developing the Local Plan Part 2.
- 20.2 Responses should be submitted using the accompanying form (Appendix 4) and **must be received by no later than 4:30pm on Friday 13 March 2017, to be formally considered as part of the statutory Regulation 18 consultation process.**
- 20.3 The next stage: What happens to customer feedback?
- East Northamptonshire Council will record all responses, together with contact details
 - All responses will be available for public viewing, whilst individual details will remain confidential actual representations cannot be treated as confidential

⁸ http://www.east-northamptonshire.gov.uk/downloads/file/6776/statement_of_community_involvement

⁹ http://www.east-northamptonshire.gov.uk/downloads/file/248/consultation_strategy

- The findings from the consultation will be published and reported to a future meeting of the Planning Policy Committee)
- In accordance with Data Protection requirements, only the customer name may be included within the published information
- Customer details will be added to the Council's database, and customers will be kept informed about the progress of the Local Plan Part 2 at all future stages of the Plan preparation process

20.4 What will happen to customer details?

- Your personal details and comments will be retained by us and may be used by us or our partners for further consultations
- Your comments will also be made available on our website
- For information regarding our compliance with the Data Protection Act please see www.east-northamptonshire.gov.uk/dataprotection

Appendix 1: Glossary of terms

The Regulation 18 Statement contains a range of abbreviations. These are mostly explained within the document text itself. However, in some cases it is deemed necessary to provide some additional explanation and this is provided within the glossary.

Term	Definition
AA/ HRA	Appropriate Assessment/ Habitat Regulations Assessment
DPD	Development Plan Document. The Local Plan Part 2 will be a statutory DPD.
JCS	North Northamptonshire Joint Core Strategy, the Part 1 Local Plan that provides strategic planning policy direction up to 2031.
Local Plan	The Local Plan Part 2 is categorised as a “site allocations”/ site specific Plan, which proposes more detailed specific land allocations and policy direction, it will form the Local Plan for East Northamptonshire.
Neighbourhood Plan	Non-strategic development plan document, prepared by Town/ Parish Councils (or designated Neighbourhood forums) under provisions introduced through the 2011 Localism Act
NPPF	National Planning Policy Framework. A single document, setting out a broad range of national planning policies objectives.
SA	Sustainability Appraisal, it will assess the environmental, social and economic impacts of plan policy and objectives.
SCS	Sustainable Communities Strategy. The SCS forms the principal community aspirational document for East Northamptonshire. It is a key factor in informing the Local Plan Part 2 vision and outcomes.
SEA	Strategic Environmental Assessment, the main objective of the SEA directive is to ‘...provide for a high level of environmental protection and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes
SELA	Strategic Employment Land Assessment. The SELA forms the principal database of potential development sites for employment.
SFRA	Strategic Flood Risk Assessment; required by national policy as part of the DPD process. Assessment of the impact of proposed developments upon the broad range of sources of potential flood risk, both within the Local Plan Part 2 area, and its potential impacts upon a wider area, e.g. North Northamptonshire or the Nene Valley.
SHLAA	Strategic Housing Land Availability Assessment. The SHLAA forms the principal database of potential housing development sites.
SHMA	Strategic Housing Market Assessment. The SHMA forms the principal evidence base document by which housing needs and demands are identified.

Appendix 2: Draft document structure for the Four Towns Plan (developed through the Four Towns Plan Working Party, 2014-15), compared to structure for North Northamptonshire Joint Core Strategy 2011-2031

Section	Joint Core Strategy (JCS), adopted July 2016 (Local Plan Part 1)	Four Towns Plan structure – agreed by Planning Policy Committee, 17 March 2014 and developed further through Four Towns Plan Working Party (2014-15)
1 st main section	Introduction – overview	Introduction: <ul style="list-style-type: none"> • Where Local Plan Part 2 sits in the Planning system • Context for Neighbourhood Planning • Duty to Cooperate • Soundness tests • Legal compliance • Sustainability Appraisal/ Strategic Environmental Assessment • Habitat Regulations Assessment • Equalities Impact Assessment • Delivery, monitoring and review
2 nd main section	Vision and Outcomes – context, area portrait etc	<ul style="list-style-type: none"> • Area portrait • Vision and Outcomes
3 rd main section	Core policies – development management policies: <ul style="list-style-type: none"> • Presumption in favour of sustainable development • Protecting and enhancing assets – environment (built and natural), landscape, social (community facilities, place shaping) 	Spatial development strategy: <ul style="list-style-type: none"> • Settlement hierarchy • Settlement boundaries
4 th main section	Spatial policies: <ul style="list-style-type: none"> • Network of urban and rural areas (spatial strategy/ settlement hierarchy) • Town centres/ town centre uses • Rural exceptions • Deenethorpe 	Historic and built environment: <ul style="list-style-type: none"> • Local buildings of architectural importance • Town centre regeneration • Conversion of rural buildings • Replacement dwellings in open countryside

Section	Joint Core Strategy (JCS), adopted July 2016 (Local Plan Part 1)	Four Towns Plan structure – agreed by Planning Policy Committee, 17 March 2014 and developed further through Four Towns Plan Working Party (2014-15)
5 th main section	Connectivity – local and strategic connections	Open space and green infrastructure: <ul style="list-style-type: none"> • Protection of existing open spaces • Local Green Space • Green infrastructure delivery plan
6 th main section	Green infrastructure, including special policy areas (Nene/ Ise Valleys, Rockingham Forest)	Social issues: <ul style="list-style-type: none"> • Housing requirements • Deliverable housing site allocations • Housing mix and tenure • Gypsies, travellers and travelling showpeople
7 th main section	Delivering economic prosperity: <ul style="list-style-type: none"> • Jobs requirements • Sectors – logistics, rural economic development • Renewables • Rockingham MRC Enterprise Area 	Economic development: <ul style="list-style-type: none"> • Town centres • Local centres • Tourism • Existing employment areas • Employment land allocations
8 th main section	Delivering homes: <ul style="list-style-type: none"> • Housing requirements/ distribution • Housing mix and tenure • Gypsies and Travellers 	Key allocations – sub areas, phasing and implementation: <ul style="list-style-type: none"> • Rushden East sustainable urban extension • Deenethorpe Airfield • Nene Park (Irthlingborough East)
10 th section	Development principles for strategic sites: <ul style="list-style-type: none"> • Rushden East SUE • Rushden Gateway (Nene Valley Farm) 	Monitoring and implementation
11 th section	Monitoring and implementation framework	

Appendix 3: Evidence base – studies and assessments currently under preparation, or undertaken to date

The North Northamptonshire Joint Planning Unit has coordinated a range of broad, strategic evidence gathering projects; e.g. retail studies, Urban Structures Study and Water Cycle Strategy. This provides an extensive evidence base for the Local Plan Part 2. However, certain bespoke evidence gathering work may still be required before the Local Plan Part 2 is ready for submission.

Further work may also be needed for the Local Plan Part 2, e.g. to inform the site selection process for employment and housing land; based, in the first instance, upon documents such as the SHLAA, Urban Structures Study and local landscape assessments. As far as possible, it is anticipated that such work will be carried out “in-house”, but in some instances it may be necessary to appoint consultants where the necessary expertise is needed.

Sustainability Appraisal/ Strategic Environmental Assessment (SEA)/ Habitat Regulations Assessment (HRA)

- Sustainability Appraisal/ SEA – Initial “scoping” work will take place alongside this statutory Regulation 18 consultation, with the Sustainability Appraisal/ SEA work undertaken in parallel with the Local Plan Part 2 process
- HRA – Full HRA undertaken to accompany the Local Plan Part 1 (JCS)¹⁰, including bespoke 2014 Golden Plover Surveys undertaken to assess impacts of the Rushden East and Nene Valley Farm (strategic) sites

Flood risk management

- Surface Water Management Plans – Currently being prepared through the County Council (Lead Local Flood Authority) for priority locations – Chelveston, Irthlingborough, Rushden and Thrapston: Planning Policy Committee, Agenda Item 7, 22 February 2016
- Flood Investigation Reports (FIRs) – Bespoke studies for hotspot locations – Brigstock; Deenethorpe; Denford; King’s Cliffe; Oundle; Lawton Road, Rushden
- Northamptonshire Local Flood Risk Management Strategy (LFRMS), October 2013 – currently being reviewed; update due to be finalised by autumn 2016
- Strategic Flood Risk Assessment (SFRA) – Level 1 SFRA finalised August 2011 (URS/ Scott Wilson), although this will require updating to reflect the most recent climate change data and requirements; Level 2 SFRA for Irthlingborough and Rushden finalised during autumn 2012

Infrastructure planning

- North Northamptonshire Infrastructure Delivery Plan (IDP), January 2015¹¹ – Identifies strategic priorities for the delivery of infrastructure needed to support the implementation of the Local Plan Part 1 over the plan period 2011-2031
- Northamptonshire Transportation Plan, March 2012¹² – with Thematic Transport Strategies

¹⁰ <http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1474>

¹¹ <http://www.nnjpu.org.uk/docs/NN%20JCS%20PRE%20SUBMISSION%20IDP%202015.pdf>

- Highways – A45 Study; transport modelling undertaken for the JCS
- Rushden Transport Study, June 2014 – consideration of current traffic management as well as future transport and travel needs of Rushden

Spatial development strategy

- Developing a settlement hierarchy for the North Northamptonshire Joint Core Strategy – Background Paper, July 2012 – identification of large/ potential service villages across the District; i.e. Brigstock, Easton on the Hill, King’s Cliffe, Nassington, Ringstead, Stanwick, Warmington, and Woodford.
- RNOTP – Settlement Hierarchy: Defining Category A and B Villages, January 2009 – Detailed settlement assessment, which identified potential service villages; i.e. King’s Cliffe, Nassington, Warmington, Brigstock, Easton on the Hill and Woodford.
- Settlement boundaries – Draft boundaries for Higham Ferrers/ Rushden, Hargrave, Irthlingborough, Newton Bromswold, Ringstead, Raunds, and Stanwick all considered through Four Towns Plan Working Party (2015). Settlement boundary approaches for Caldecott, Chelston Rise, Chelveston, Higham Ferrers and Stanwick all proposed in Neighbourhood Plans.

Historic/ built environment

- Local List of Heritage Assets, approved by Planning Policy Committee, 22 July 2013¹³ – Draft Local List for former Four Towns Plan area, in addition to partial list incorporated into RNOTP (Policy 9/ Appendix 3).
- Regeneration masterplans – Masterplanning for Higham Ferrers, Irthlingborough, Raunds and Rushden undertaken during 2010/11 and have informed Higham Ferrers and Raunds Neighbourhood Plans
- Thrapston Community Plan (Master Plan) adopted by East Northamptonshire Council, 22 July 2013; e.g. focus upon Cattle Market as priority regeneration site
- Future town centre masterplanning could inform emerging Neighbourhood Plans for Irthlingborough, Oundle and Rushden

Open space and green infrastructure

- Open Space Assessment and Playing Pitch Strategy – currently under preparation; due to be finalised early 2017 – Knight Kavanagh and Page (KKP)
- Local Green Space – Part 2 Local Plan approach considered through Four Towns Plan Working Party (2015)
- North Northamptonshire Strategic Sports Facilities Framework Update, September 2014¹⁴ – Update to 2010 Nortoft study, setting sports facilities priorities
- North Northamptonshire Green Infrastructure Delivery Plan, May 2014¹⁵ – Green infrastructure corridor projects planned and underway across North Northamptonshire, including specific projects within East Northamptonshire

¹² <http://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Pages/local-transport-plan.aspx>

¹³ http://www.east-northamptonshire.gov.uk/meetings/meeting/429/planning_policy_committee

¹⁴

<http://www.nnjpu.org.uk/docs/FINAL%20NN%20Strategic%20Sports%20Facilities%20Framework%20Update%20Sep%202014.pdf>

¹⁵ http://www.nnjpu.org.uk/docs/7_Appendix_1_full_GIDP_June_2014.pdf

- River Nene Regional Park projects – River Nene Catchment Management Plan; ecosystem services (e.g. Forests for Life); Nene Valley Nature Improvement Area (e.g. visitor studies; Mapping Natural Capital and Ecosystem Services in the Nene Valley, October 2016)

Social issues: housing

- Housing requirements for the remainder of the Plan period (2016-2031) were set out as part of the “Future Approach to Plan Making within the District” paper, considered by the Council on 11 April 2016 (Agenda Item 11, Appendix 2)
- Strategic Housing Market Assessment (SHMA) – periodic updates (most recent, 2015), using Housing Vision toolkit
- District and Ward-Level Housing Mix Requirements Assessment, March 2016 – analysis/ findings relating to the size and mix of new properties required
- North Northamptonshire Strategic Housing Land Availability Assessment (SHLAA), May 2013 and subsequent updates¹⁶ – The SHLAA provides basic site assessments, undertaken in conjunction with East Northamptonshire Council’s online site submission form¹⁷. For the purposes of site selection, more detailed site assessments would be necessary, although bespoke studies may be prepared as part of the supporting evidence base for Neighbourhood Plans.
- North Northamptonshire Gypsy and Traveller Accommodation Assessment Update 2011, October 2011¹⁸

Economic policies

- Town centre boundaries/ primary shopping areas – Methodologies for defining boundaries were considered through the Four Towns Plan Working Party (2015). Designated town centre boundary and primary shopping frontage for Higham Ferrers included within adopted Neighbourhood Plan.
- Local centres – Approaches and possible local centre designations were considered through Four Towns Plan Working Party (2015)
- Town centres and retail – impact test thresholds – Approaches to setting local trigger floorspace thresholds for retail impact assessments were considered through Four Towns Plan Working Party (2016)
- Tourism – Possible Local Plan Part 2 policy framework was considered through Four Towns Plan Working Party (2015)
- Employment Land Review (ELR) – An update to the previous (2006) study would be necessary; much officer-level evidence has previously been gathered, which would then need to inform the allocation/ designation of protected employment areas through the Local Plan Part 2
- Other deliverable employment land allocations – Major strategic employment sites (e.g. Rushden Lakes, Warth Park, Rushden Gateway/ Nene Valley Farm and Rushden East) are already coming forward in the form of existing commitments or through the Local Plan Part 1.
- Irthlingborough East – the Four Towns Plan Working Party (2015) previously considered the need for additional strategic employment allocations it was found that the major committed sites could deliver in excess of the JCS jobs targets;

¹⁶ <http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1324>

¹⁷ http://www.east-northamptonshire.gov.uk/site/scripts/documents_info.php?documentID=1580&pageNumber=1

¹⁸ <http://www.nnjpu.org.uk/docs/Northamptonshire%202011%20GTAA%20UpdateFinal%20Report%202012-2022%20October%202011.pdf>

although effective regeneration of the Nene Park/ Nene Business Park (Irthlingborough East) employment area should be a priority for the Local Plan Part 2).

Site specific allocations

- Deenethorpe Airfield Area of Opportunity – Masterplanning for site allocation and the development of further policy detail to be led through Deenethorpe Airfield Working Party
- Rushden East – Masterplanning for site allocation and the development of further policy detail to be led through Rushden East Project Board
- Irthlingborough East – Masterplanning for site allocation and regeneration policy criteria should be a priority for Local Plan Part 2
- Other site specific allocations (e.g. contingency sites) – Site selection process to be led through Local Plan Working Party

Other evidence base

- Duty to Cooperate – JCS (Local Plan Part 1) submission documents, July 2015
- JCS viability assessments, 2015
- Submission evidence regarding the Duty to Cooperate and Plan Viability prepared for the Core Strategy (JCS) will need to be reviewed, to support the Local Plan Part 2 at the submission stage

Appendix 4 – Regulation 18 Consultation Form



For Office Use Only	
Ref No.	
Date Received:	
Date Acknowledged:	
Entered By:	

East Northamptonshire Local Plan: Local Plan Part 2: Regulation 18 consultation form

This form may be photocopied or downloaded from the website. Further printed copies can also be obtained from the Council. **Please return by 4:30pm on Monday, 13 March 2017.**

This form can be returned by e-mail to planningpolicy@east-northamptonshire.gov.uk or by post to East Northamptonshire Council, Cedar Drive, Thrapston, Kettering. NN14 4LZ. *Email is the Council's preferred method of receiving comments, as it will help us to handle your representation quickly and efficiently.*

East Northamptonshire Council will consider all representations made if returned by the deadline. Customer data will be maintained, in accordance with our legal responsibilities under the Data Protection Act.

Personal Details		Agents Details (if applicable)	
Organisation Name:		Organisation Name:	
Contact Name:		Contact Name:	
Address:		Address:	
Tel:		Tel:	
Fax:		Fax:	
E-mail:		E-mail:	

Question number/ reference

Theme/ topic

[Please use a separate form for each question to which you are responding]

Reason for your representation

[Please provide a brief summary of your comments]

Detailed statement

[Please set out your representation in full, clearly explaining your views in relation to the question to which you are responding (continue on a separate sheet as necessary)]

Signature:

Date:



East
Northamptonshire
Council