



## Planning Policy Committee – 13 February 2013

### Four Towns Plan - Regulation 18 Consultation

#### Purpose of report

This report provides a summary of the main themes and issues arising from the initial Four Towns Plan statutory consultation, which took place over 6 weeks, between 2 November and 17 December 2012, inclusive.

#### Attachment(s)

Appendix 1 – Schedule of representations received through Four Towns Plan Regulation 18 Consultation

Appendix 2 – Schedule of representations received through consultation on the Draft Sustainability Appraisal Scoping Report for the Four Towns Plan

Appendix 3 – Schedule of representations received through consultation for the Habitat Regulations Assessment Stage 1 Screening report

Appendix 4 – List of key evidence base documents identified through the Consultation process

#### 1.0 Introduction

- 1.1 The initial stage in the Four Towns Plan preparation process consists of a statutory 6 week consultation, inviting statutory consultees (or “specific consultation bodies”) to make representations to the Council about the subject matter that the Four Towns Plan (as a site specific development plan document forming one part of the Local Plan for East Northamptonshire) ought to contain.
- 1.2 The Plan preparation process is also accompanied by two further parallel processes. These cover Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitat Regulations Assessment.
- 1.3 The statutory consultation took place over 6 weeks (2 November – 17 December 2012, inclusive) in accordance with the following Statutory Instruments:
  - The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 18 and 35;
  - The Environmental Assessment of Plans and Programmes Regulations 2004 – Regulations 11 and 12; and
  - The Conservation of Habitats and Species Regulations 2010 – Regulation 102
- 1.4 This report summarises the main issues raised by respondents, through the consultation process. It covers comments received regarding the Four Towns Plan Regulation 18 Consultation document (approved for consultation by the Planning Policy Committee on 17 September 2012), the Draft Sustainability Appraisal Scoping Report for the Four Towns Plan and the Four Towns Plan: Habitat Regulations Assessment Stage 1 Screening report. This report addresses the following matters:
  - Number of representations and individual comments received through the consultation process (Section 2.0)
  - Summary of comments received in response to Q1 (Regulation 18 Statement): Scope of the Four Towns Plan (Section 3.0)
  - Summary of comments received in response to Q2 (Regulation 18 Statement): Three Towns and Raunds Area – previous evidence base (Section 4.0)
  - Summary of comments received in response to Q3 (Regulation 18 Statement): Recent evidence base (Section 5.0)

- Summary of comments received in response to Q4 (Regulation 18 Statement): Themes and Topics (Section 6.0)
- Summary of comments received in response to Q5 (Regulation 18 Statement): Timetable (Section 7.0)
- Other matters arising through the Regulation 18 consultation (Section 8.0)
- Summary of representations received regarding Sustainability Appraisal and Habitat Regulations Assessment (Section 9.0)

## **2.0 Number of representations and individual comments received through the consultation process**

2.1 The majority of representations received during the 6 weeks consultation (2 November – 17 December 2002, inclusive) concerned the Regulation 18 document and the five questions set out in that paper. In total, **27** separate representations were submitted, raising **100** different comments.

2.2 In response to the Draft Sustainability Appraisal Scoping Report, representations were received from the following organisations, raising **36** different comments:

- English Heritage (6 comments)
- Environment Agency (12 comments)
- Highways Agency (2 comments)
- Natural England (16 comments)

2.3 Finally, Natural England submitted **3** specific comments regarding the Habitat Regulations Assessment Stage 1 Screening report. Full details of representations received, together with a draft officer response for each comment, are set out in **appendices 1-3**.

## **3.0 Summary of comments received in response to Q1 (Regulation 18 Statement): Scope of the Four Towns Plan**

3.1 The majority of representations regarding the proposed scope for the Four Towns Plan were satisfied that the suggested framework guiding its preparation were appropriate. One respondent (Barwood Land) emphasised the need to progress the Four Towns Plan in line with the emerging North Northamptonshire Joint Core Strategy (JCS) review, to ensure that the policies remain consistent.

3.2 Other respondents highlighted three main themes which need to be included within the scope of the Four Towns Plan. It was emphasised that the Four Towns Plan should include policies to address/ give consideration to:

- The historic environment, including detailed local policies for individual settlements or character areas within the towns (English Heritage)
- Rural issues (Stanwick Parish Council)
- Existing infrastructure deficit (Cllr A Mercer)

3.3 Rushden Town Council and Cllr A Mercer identified a range of matters that the Rushden East urban extension policy would need to consider:

- Infrastructure requirements, including addressing local infrastructure deficits, e.g. education (especially secondary education), healthcare (e.g. recent loss of Hayway Clinic), utilities, emergency services
- Transport and communications, e.g. A6/ A45 duelling (strategic highways), new railway station for the town (i.e. Irchester) faster bus connections, high speed Broadband etc
- Phasing of development
- Green infrastructure, e.g. further urban green space, new cemetery for

Rushden/ Higham Ferrers and additional allotments

- Leisure/ recreation facilities, e.g. youth clubs, night time economy
- Employment, including provision for additional hotels, tourism and retail
- Housing mix and design
- Environmental constraints, e.g. flood risk

#### **4.0 Summary of comments received in response to Q2 (Regulation 18 Statement): Three Towns and Raunds Area – previous evidence base**

4.1 A broad range of evidence has been gathered regarding the Four Towns Plan area over the past decade. Previous work to review and update the Local Plan for the area included an extensive range of consultations (several events, between 2004-7) for the Plan area. Given that over 5 years have now passed since these earlier rounds of consultation, it has been necessary to consider how much of this previous evidence base remains valid and relevant.

4.2 Consultees were asked to consider how much of the previous evidence, collected during the earlier consultations, remains relevant. A number of respondents (e.g. Bedford Borough Council, Newton Bromswold Parish Meeting, Higham Ferrers Town Council and Northamptonshire NIA Officer) considered that the use of earlier evidence remains appropriate, not least as this needs to be considered in order to assess where further evidence gathering will be necessary. It has been argued that a comprehensive strategy for ensuring that the evidence base is up to date will be essential. Barwood Land highlighted that earlier evidence (e.g. the Urban Extensions studies, 2006/7) continues to be relevant.

4.3 Other respondents have suggested an appropriate “shelf life” for earlier evidence. Cllr A Mercer and Rushden Town Council have both argued that the Three Towns and Raunds Area Preferred Options (September 2006 and January 2007 respectively) should not be considered up to date. Instead, they argue, more recent Masterplans, e.g. Rushden Town Centre Regeneration Strategy (Prince’s Foundation, June 2010), Raunds Masterplan (March 2011) and the emerging Higham Ferrers and Irthlingborough Masterplans; are more relevant and up to date.

4.4 Cllr A Mercer has argued that documents produced before 2008 should be considered “out of date”. Sport England has suggested an even more rigorous timescale; that evidence more than 3 years old is “out of date”, although Sport England also highlights that the evidence base should be updated to ensure it is “future-proofed” to 2031.

4.5 Themes and topics where the lack of an up to date evidence base have been highlighted include town centre boundaries and shopping areas (Cllr G Mercer). Stanwick Parish Council has also highlighted the need for up to date local housing needs surveys.

#### **5.0 Summary of comments received in response to Q3 (Regulation 18 Statement): Recent evidence base**

5.1 A range of further relevant evidence base documentation has been highlighted by the majority of respondents. These documents include specific local studies (e.g. Retail Capacity Assessments and Gypsy and Traveller Accommodation Assessments), non-statutory plans and strategies (e.g. Community/ Parish Plans) and best practice guidance (English Heritage, Environment Agency and Natural England publications).

5.2 Specific relevant environment-related documents identified through the consultation include:

- Conservation Area Appraisals (English Heritage)
- English Heritage guidance (English Heritage)
- North Northamptonshire Flood Risk Management Strategy (March 2012)

(Environment Agency)

- Northamptonshire Biodiversity Partnership Habitat Opportunity Map (The Wildlife Trust)

5.3 Specific relevant community and social-related documents identified through the consultation include:

- Emerging Higham Ferrers Neighbourhood Plan consultation responses (Higham Ferrers Town Council)
- Bedfordshire and Luton Strategic Housing Market Assessment (March 2010) (Bedford Borough Council)

5.4 Specific relevant economic and transport related documents identified through the consultation include:

- North Northamptonshire Retail Capacity Study (2012 Update)
- East Midlands Route Utilisation Strategy (Highways Agency, February 2010)

5.5 Stanwick Parish Council has emphasised the District Council's role in determining what represents a robust evidence base. Other respondents (e.g. Barwood Land) have highlighted the importance of site specific studies submitted in support of recent planning applications, e.g. Rushden Lakes; Darsdale Farm/ Northdale End/ West End (Raunds); Rushden Hospital. The role of "in-house" studies, produced by East Northamptonshire Council, was noted through the consultation. Full details about all of the documents identified through the consultation are set out in **Appendix 4**.

## 6.0 **Summary of comments received in response to Q4 (Regulation 18 Statement): Themes and Topics**

6.1 Consultees were invited to put forward specific ideas for themes, topics and specific policies that should be included within the Four Towns Plan. Respondents put forward a broad range of thoughts and ideas. Many representations were supportive of the generic themes specified in the Regulation 18 consultation document, although other respondents highlighted a range of themes that were considered necessary for inclusion within the Four Towns Plan. Broadly, comments relating to specific themes and topics fell within three categories:

- Environment
- Housing
- Town centres
- Relationship with national policy (NPPF) and emerging JCS review
- Rushden East urban extension
- Alternative site specific proposals

6.2 **Environment** – A number of consultees emphasised a range of matters for which specific policies or proposals would be desirable for inclusion within the Four Towns Plan. These included:

- Historic environment (English Heritage, Cllr A Mercer) – address through a range of policies, particularly regarding town centre regeneration, rural buildings, locally listed buildings
- Nene Valley NIA (Natural England, Wildlife Trust, NIA Officer etc) – including site specific proposals, e.g. Irthlingborough Lakes and Meadows Local Natural Reserve (115ha), A45 footbridge link between Stanwick/ Stanwick Lakes
- Design standards (Cllr A Mercer, Northamptonshire Police) – housing mix and density; community safety, e.g. traffic calming, Planning out Crime; Code for Sustainable Homes/ BREEAM standards
- Policies for rural areas (Stanwick Parish Council), e.g. settlement boundaries

- 6.3 **Housing** – Certain consultees (e.g. Bedford Borough Council) emphasised the need for robust policies regarding affordable housing delivery and quality. It was highlighted that housing policies will need to address a broad range of issues, in particular definition, thresholds, viability, design, mix and rural exceptions. The need to allocate land for Gypsy and Traveller sites was also identified by Bedford Borough Council.
- 6.4 **Town centres** – Respondents identified particular economic matters which the Four Towns Plan will need to address. Cllrs A and G Mercer emphasised the need to focus upon issues affecting town centres. Mr and Mrs Mercer specified that policies were needed to address matters such as the mix of local services and town centre uses, e.g. the impact of fast food takeaways. Other key factors which impact upon the town centres include the need for adequate parking provision, together with the definition of robust town centre boundaries (this continuing to be a national/ NPPF policy requirement).
- 6.5 **Relationship with national policy (NPPF) and emerging JCS review** – Certain respondents (e.g. Cllr A Mercer, Stanwick Parish Council) raised a number of concerns surrounding the status of the Four Towns Plan and its relationship with broader strategic policies (specifically the NPPF, East Midlands Regional Plan and emerging JCS review). These related to the need to include clear contextual information, specifically regarding strategic housing and employment targets.
- 6.6 The need to set a clear vision and identity (up to 30 years) for the Four Towns Plan was emphasised (Cllr A Mercer). Certain respondents (e.g. Stanwick Parish Council) specified a need to define detailed local spatial strategies for individual communities, taking account of local views. Cllr A Mercer also considered that the Four Towns Plan ought to focus less upon delivering strategic targets such as renewable energy and land allocations (e.g. Gypsy and Traveller sites) and more upon being a “Local Plan” for the area.
- 6.7 **Rushden East urban extension** – Certain respondents (e.g. Rushden Town Council, Newton Bromswold Parish Meeting) recognised the impact of the emerging Rushden strategic urban extension proposals (JCS review proposal) upon the Four Towns Plan, when adopted, and its ultimate implementation. A number of views were expressed in respect of the Rushden East proposals, namely:
- Need to consider alternative directions of growth, e.g. Rushden West (Wellingborough Borough/ Irchester Parish);
  - Concerns regarding development beyond the A6 Bypass, which represents a natural boundary to Rushden (Newton Bromswold Parish Meeting).
- 6.8 **Alternative site specific proposals** – In response to the consultation, 4 respondents put forward alternative/ potential site specific proposals. These need to be considered as potential site specific proposals as the Four Towns Plan is progressed. The following alternative site specific proposals were identified through the Regulation 18 consultation:
- ‘Middle End’ (between Northdale End and West End), Brick Kiln Road, Raunds (Barwood Land) – 28ha
  - Land north of Rutland Lodge, West Street, Stanwick (Courtyard Hotel) – 3.4ha
  - Land south of Church House, Caldecott (Peter Mommersteeg) – 0.9ha
  - Rushden West (Newton Bromswold Parish Meeting)
- 6.9 All comments received regarding the specific content of the Four Towns Plan will need to be considered against the draft “Policy Outcomes”. In many cases, particular issues will be appropriately addressed through emerging JCS policies. In other cases, it will be necessary to include individual specific policies and/ or policy criteria.
- 7.0 **Summary of comments received in response to Q5 (Regulation 18 Statement):  
Timetable**

7.1 Consultees were asked to give specific consideration to the timetable for the Four Towns Plan. The majority of representations expressed support for the proposed timescale for the Four Towns Plan (2011-31, in line with the emerging JCS review). Certain respondents (e.g. Bedford Borough Council, Stanwick Parish Council) have highlighted the need to ensure that the Four Towns Plan will be sufficiently flexible to accommodate longer term changes.

7.2 A small number of respondents have proposed alternative timetables. Cllr A Mercer and Rushden Town Council have suggested that the Four Towns Plan should cover the period 2013/14-2031, to reflect the Plan's anticipated adoption date. Newton Bromswold Parish Meeting has emphasised the need for a 3-5 year review cycle for the Plan.

## **8.0 Other matters arising through the Regulation 18 consultation**

8.1 A number of respondents (e.g. Civil Aviation Authority, Northamptonshire County Council, Podington Parish Council and Collyweston Parish Council) all responded to the consultation, requesting that the consultation database be updated with current contact details. All of these representations have been taken into account, and the database updated accordingly.

8.2 The University Hospitals of Leicester NHS Trust expressed concerns about the need for clearer links through the website to relevant consultation documents. These concerns were addressed during the consultation process and a small number of modifications to the relevant web pages were made in response.

## **9.0 Summary of representations received regarding Sustainability Appraisal and Habitat Regulations Assessment**

9.1 As stated, four separate consultees commented upon the Draft Sustainability Appraisal (SA) Scoping Report and Habitat Regulations Assessment (HRA) documentation. The majority of these related to specific sections of the draft report; i.e. requesting greater clarity or emphasis for a particular topic within the Draft SA Scoping Report.

9.2 **English Heritage** requested the inclusion of NPPF terminology throughout the document (e.g. 'heritage assets' and 'scheduled monuments'), with particular reference to paragraphs 3.86-3.87. English Heritage also emphasised the need to recognise both designated and non-designated heritage assets.

9.3 The **Environment Agency** submitted a number of relevant comments in respect of the Draft SA Scoping Report. A number of additions to the report were put forward; summarised as follows.

- **Landscape and natural environment** – Include reference to the recently designated Nene Valley Nature Improvement Area (NIA), also highlighted by NCC's NIA Officer and The Wildlife Trust.
- **Water Quality and Resources (paragraphs 3.91-3.100)** – Include additional or more prominent reference to groundwater quality (Water Framework Directive requirements), Flood Risk (e.g. Main Watercourse designations) and surface water drainage.
- **Soil and Land (paragraphs 3.101-3.106)** – Include additional reference to land contamination and its potential impact upon groundwater.

9.4 The **Highways Agency** (HA) expressed general support for the content of the Draft SA Scoping Report. However, the HA also suggested including reference to a possible project to improve the Chowns Mill roundabout by 2015.

9.5 **Natural England**, like the Environment Agency, has submitted an extensive range of

comments regarding the content of the Draft SA Scoping Report. Like the Environment Agency, Natural England specified a need for the report to include reference to the Nene Valley NIA. Natural England also raised concerns about the impact that the proposed level of new development in the Four Towns area will have upon the Upper Nene Valley Special Protection Area (SPA)/ Ramsar site.

9.6 Natural England's comments in respect of the Draft SA Scoping Report are generally supportive (i.e. in respect of Landscape Character, Water Quality and Resources, Soils and Land, Green Infrastructure and Sustainability Objectives). However, Natural England has suggested the following additions to the Report:

- **Soils and Land** – Emphasise importance of Grade 2 agricultural land areas.
- **Green Infrastructure** – Emphasise importance of good quality local green spaces, e.g. through use of Accessible Natural Greenspace Standards, Green Flag standards etc.

9.7 Natural England, the only consultee which has made a direct response in respect of the HRA Stage 1 Screening report, has expressed general support for the Enfusion update note. Natural England also emphasised a need to be involved in discussions/ consultations as the HRA progresses.

9.8 It is intended that the comments submitted by the four respondents (all statutory consultees) will be incorporated within the SA Scoping Report and HRA Stage 1 Screening report. All relevant consultees will be asked to comment further as the SA and HRA are developed in parallel with the Four Towns Plan.

## **10.0 Conclusion**

10.1 This report is presented to Members, for information, as a summary of representations received during the recent statutory 6-weeks consultation (2 November – 17 December 2012 inclusive) for the Four Towns Plan (Regulation 18), SA Scoping Report and HRA Stage 1 Screening report. All representations received will then be taken into account in informing the next stages of the Four Towns Plan process.

## **11.0 Equality and Diversity Implications**

11.1 There are no equality and diversity implications.

## **12.0 Legal Implications**

12.1 In order to fulfil the requirements of the relevant Statutory Instruments (see paragraph 1.3, above), it will be necessary to demonstrate that consultation responses have been given appropriate consideration as part of the Four Towns Plan process. This is especially important in respect those statutory bodies identified through the "Duty to Cooperate" in the 2011 Localism Act. East Northamptonshire Council must continue to engage closely, constructively, actively and on an ongoing basis with these bodies in preparing Development Plan Documents (in this case, the Four Towns Plan).

## **13.0 Risk Management**

13.0 There are no risks associated with this report. However, further delays in progressing the North Northamptonshire JCS review and Four Towns Plan (i.e. the new Local Plan) will have the potential to increase the number of hostile planning appeals and/ or cost awards, in view of the Council's lack of an up to date Local Plan.

## **14.0 Financial implications**

14.1 There are no financial implications associated with this report.

## 15.0 Corporate Outcomes

15.1 The relevant Corporate Outcomes are:

- Good quality of life – prosperous, sustainable
- Effective partnership working
- Strong community leadership
- Effective management
- Knowledge of our customers and communities

## 16.0 Recommendation

16.1 **The summary of representations received during the recent 6-weeks Regulation 18 consultation for the Four Towns Plan, Draft SA Scoping Report and HRA Stage 1 Screening report is presented to Members for information. Members are asked to endorse this report, which will then form part of the evidence base for the Four Towns Plan.**

*(Reason – to ensure progress is made with preparing the Four Towns Plan site specific development plan document).*

<b>Legal</b>	Power: <b>Localism Act 2011; Planning and Compulsory Purchase Act 2004; The Town and Country Planning (Local Planning) (England) Regulations 2012; The Environmental Assessment of Plans and Programmes Regulations 2004; The Conservation of Habitats and Species Regulations 2010</b>				
	Other considerations: <b>None</b>				
<b>Background Papers:</b>					
<b>Person Originating Report:</b>		<b>Michael Burton (Senior Planning Policy Officer) Tel: 01832 742221</b>			
<b>Date: 04 February 2013</b>					
<b>CFO</b>		<b>MO</b>		<b>CX</b>	

(Committee Report Normal Rev. 22)

**APPENDIX 1: Schedule of representations received through Four Towns Plan Regulation 18 Consultation (2 November - 17 December 2012, inclusive)**

<b>Comment Ref</b>	<b>Customer Ref</b>	<b>Respondent Name</b>	<b>Representation Type</b>	<b>Policy Reference</b>	<b>Policy Title</b>	<b>Comment Text</b>	<b>Response Text</b>
00205/ENLP FTP/2/001	00205	Collyweston Parish Council	Comment	N/A		Collyweston Parish Council has not received any communication on the consultation. Please confirm Council is part of the consultation process.	Email to Collyweston Parish Council (19.11.2012)
00205/ENLP FTP/3/001	00205	Collyweston Parish Council	Comment	FTP_Q3	Recent evidence base	Revised housing target figures were published before onset of Recession, which stopped all major housing development taking place. [Collyweston Parish] Council does not have current housing targets on file; unable to deal with this DPD.	Noted
00223/ENLP FTP/11/001	00223	English Heritage	Comment	FTP_Q1	Scope	Recommend locally specific development management policies for historic environment are developed.	Noted. It is anticipated that appropriate policies for managing the historic environment will be put in place.
00223/ENLP FTP/11/002	00223	English Heritage	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Recommend baseline data for historic environment is reviewed, including local characterisation studies such as Conservation Area Appraisals and county Historic Landscape Characterisation, in line with paragraphs 169-170 (NPPF)/ 'Heritage in local plans: how to create a sound plan under the NPPF': <a href="http://www.englishheritage.org.uk/professional/advise/government-planning-policy/national-planning-policyframework/">http://www.englishheritage.org.uk/professional/advise/government-planning-policy/national-planning-policyframework/</a> . Baseline data will also be part of Sustainability Appraisal.	Noted. It will be necessary to consider undertaking further bespoke historic environmental data/ evidence gathering as draft policies are written.
00223/ENLP FTP/11/003	00223	English Heritage	Comment	FTP_Q4	Themes and Topics	DPD should build on strategy for historic environment that should underpin policies in Emerging North Northamptonshire Joint Core Strategy. Historic environment matters should not just be addressed in specific historic environment policies, but in other policies, e.g. conversion of traditional farm buildings and town centre policies.	Noted

**APPENDIX 1: Schedule of representations received through Four Towns Plan Regulation 18 Consultation (2 November - 17 December 2012, inclusive)**

00223/ENLP _FTP/11/004	00223	English Heritage	Support	FTP_Q5	Timetable	Appropriate for both plans [Core Strategy review and Four Towns Plan] to have same end date.	Support noted
00480/ENLP _FTP/1/001	00480	Cllr Glenn Harwood MBE	Comment	FTP_Q3	Recent evidence base	Reference paragraph 5 evidence gathering: fifth 'bullet' at paragraph 5.1 says: 'Settlement boundaries - Options paper considered by Members and finalised August 2012'. Not sure which 'Options Paper' that refers to: please send electronic copy.	Email to Cllr Harwood, 19.11.2012
00494/ENLP _FTP/2/001	00494	Rushden Town Council	Comment	FTP_Q1	Scope	Suggested scope sufficient. In respect of proposed strategic allocation, it must be clear that detailed Four Towns Plan site specific policy will deal comprehensively with matters such as infrastructure requirements to include primary/ secondary school education; new cemetery site; improved transport links; development phasing; employment type/ quantum; residential development types/ densities; structural landscaping/ open space; site specific approach to flood risk/ environmental sustainability and associated matters. Retail, tourism/ leisure and sporting facilities also need to be consideration within strategic site allocation for Rushden.	Comments noted. The views of Rushden Town Council will be critical in determining the eventual format for any site specific policy regarding the proposed strategic land allocation at Rushden.
00494/ENLP _FTP/2/002	00494	Rushden Town Council	Object	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Critical that evidence base is robust/ up-to-date. Three Town Plan should not be considered in any part of evidence gathering. However, Rushden Masterplan Town Centre Regeneration Strategy document (Prince's Foundation) must be accepted as important evidence and should be refined/ updated by community consultation and planning events which Town Council is keen to take active part in.	Comments noted. The 2010 Regeneration Masterplan will clearly form a critical element of the evidence base for the emerging Four Towns Plan.

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00494/ENLP _FTP/2/003	00494	Rushden Town Council	Object	FTP_Q3	Recent evidence base	Evidence base listed in consultation document is incomplete. In absences of robust independent viability assessment deliverability of sites proposed for allocation not tested/ demonstrated.Re proposed strategic allocation at Rushden, Town Council must be satisfied that infrastructure requirements can be viably delivered in accordance with timetable which supports proposed phasing. Suggest that economic reports (LXB Ltd) could be utilised in Four Towns Plan policy options.	Comments noted. Evidence base gathering is very much "work in progress". Viability assessment work will need to be undertaken prior to allocating any specific development sites through the Four Towns Plan.
00494/ENLP _FTP/2/004	00494	Rushden Town Council	Comment	FTP_Q4	Themes and Topics	Deliverability not listed in draft Policy Outcomes - must be added. No merit in allocating land if financial viability or impact of infrastructure demands not robustly considered. Robust independent viability assessment must support this, to ensure infrastructure requirements can be funded/ provided in timely manner. Infrastructure requirements to include power/ sewerage infrastructure, schools/ healthcare, cemetery provision and ambulance/ police provision.	Comments noted
00494/ENLP _FTP/2/005	00494	Rushden Town Council	Object	FTP_Q5	Timetable	Timescale should cover period 2014-2031 to allow development to be planned, phased and delivered. Plan needs to be reviewed every three years to be implemented by 5th Year. Should be treated as a 'living document'.	Comments noted. The timetable should accord with the emerging North Northamptonshire Core Strategy review, as the latter forms the overarching strategic Development Plan (Local Plan) Document.
00500/ENLP _FTP/3/001	00500	Higham Ferrers Town Council	Support	FTP_Q1	Scope	Yes [Supporting representation]	Support noted

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00500/ENLP _FTP/3/002	00500	Higham Ferrers Town Council	Support	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Yes [Supporting representation]	Support noted
00500/ENLP _FTP/3/003	00500	Higham Ferrers Town Council	Comment	FTP_Q3	Recent evidence base	Transport Plan - Higham Ferrers; Higham Ferrers Neighbourhood Plan - Consultation Responses	Noted
00500/ENLP _FTP/3/004	00500	Higham Ferrers Town Council	Support	FTP_Q4	Themes and Topics	No [supporting representation]	Support noted
00500/ENLP _FTP/3/005	00500	Higham Ferrers Town Council	Support	FTP_Q5	Timetable	Yes [supporting representation]	Support noted
00517/ENLP _FTP/1/001	00517	Cllr Gill Mercer	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Concerned that town centre definition being considered is very out of date. Consultation refers to "Town Centre definition-town centre boundaries and primary shopping areas" and quotes some dates in 2010. More recent studies should be considered rather than 1996 and 2006 documents. "3 Towns Preferred options of 2006", should not be considered in future; almost no Member input, never adopted. Do not know if newer (2010) studies will come to different conclusions, but should be looking at most recent data. If not have anything later more work should be done for 4 Towns plan in this area.	Comments noted. As explained in paragraph 5.1, work is already underway to prepare town centre boundaries/ primary shopping area paper.
00250/ENLP _FTP/3/001	00250	Environment Agency	Support	FTP_Q1	Scope	Yes [supporting representation]	Support noted

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00250/ENLP FTP/3/002	00250	Environment Agency	Support	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Yes [supporting representation]	Support noted
00250/ENLP FTP/3/003	00250	Environment Agency	Comment	FTP_Q3	Recent evidence base	Biodiversity - Plan should have regard to Nene Valley Nature Improvement Area	Noted
00250/ENLP FTP/3/004	00250	Environment Agency	Support	FTP_Q5	Timetable	Yes [supporting representation]	Support noted
01002/ENLP FTP/3/001	01002	Corby Borough Council	Support	FTP_Q1	Scope	No comments [supporting representation]	Support noted
01002/ENLP FTP/3/002	01002	Corby Borough Council	Support	FTP_Q2	Three Towns and Raunds Area - previous evidence base	No comments [supporting representation]	Support noted
01002/ENLP FTP/3/003	01002	Corby Borough Council	Comment	FTP_Q3	Recent evidence base	Transport Plans/ Strategies from Northamptonshire County Council should be included in the evidence base for the local level eg. Bus Strategy	Noted
01002/ENLP FTP/3/004	01002	Corby Borough Council	Support	FTP_Q4	Themes and Topics	No comments [supporting representation]	Support noted
01002/ENLP FTP/3/005	01002	Corby Borough Council	Support	FTP_Q5	Timetable	No comments [supporting representation]	Support noted
02020/ENLP FTP/2/001	02020	Newton Bromswold Parish Meeting	Comment	FTP_Q1	Scope	Sufficient though should not be limited to throughout the process	Comments noted

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02020/ENLP _FTP/2/002	02020	Newton Bromswold Parish Meeting	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Approach is cost effective route, however review of previous studies for relevance/ validity should be carried out	Comments noted
02020/ENLP _FTP/2/003	02020	Newton Bromswold Parish Meeting	Object	FTP_Q3	Recent evidence base	Would like to see information on impact of bypass (A6) through proposed expansion east of Rushden. Preference to be west as bypass dictates town boundary.	Comments noted. The proposal for a strategic development to the east of the A6 (Rushden/ Higham Ferrers boundary) has arisen through the emerging North Northamptonshire Joint Core Strategy review. If Rushden East is deemed to be the best/ optimum location for growth, the Four Towns Plan will then set out detailed proposals for the site, including defining the site boundary on the policies (proposals) map.
02020/ENLP _FTP/2/004	02020	Newton Bromswold Parish Meeting	Object	FTP_Q4	Themes and Topics	Bypass normally dictates boundary of town. Proposal to extend Rushden to east bringing safety issues of residential both sides of main arterial route.	Comments noted. The proposal for a strategic development to the east of the A6 (Rushden/ Higham Ferrers boundary) has arisen through the emerging North Northamptonshire Joint Core Strategy review. If Rushden East is deemed to be the best/ optimum location for growth, the Four Towns Plan will then set out detailed proposals for the site, including defining the site boundary on the policies (proposals) map.

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02020/ENLP _FTP/2/005	02020	Newton Bromswold Parish Meeting	Object	FTP_Q5	Timetable	Would prefer 5 year life with regular reviews at 5 years to ensure strategy remains fit for purpose.	Comments noted. The timetable has been set to correspond directly to that for the emerging North Northamptonshire Joint Core Strategy (JCS) review; the strategic 'parent' development plan document for the Four Towns area. In practice, however, it is anticipated that a review cycle will take place over 3-5 years in order to ensure that the Four Towns Plan remains up to date.
02020/ENLP _FTP/2/006	02020	Newton Bromswold Parish Meeting	Object	FTP_Q3	Recent evidence base	From submitted information, not clear ruling out west side of Rushden which, taking into account the proposed development for new offices and recreational facilities opposite Waitrose would be more natural route to take and allow further expansion.	Comments noted. The relevant evidence base, considered by the Planning Policy Committee on 18 June 2012, noted that: "if the Rushden Lakes/ Skew Bridge scheme is permitted, this will have a significant bearing upon the relative merits of these possible alternative directions" (Agenda item 6, para 7.6). Clearly, further consideration will need to be given, in the event that the latest proposals for Rushden Lakes/ Skew Bridge were to granted.

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02025/ENLP _FTP/3/001	02025	Stanwick Parish Council	Object	FTP_Q1	Scope	Document has no firm guidelines - flimsy, light weight and open to interpretation and abuse by developers. Concerned that East Northamptonshire Council is relinquishing responsibility for setting housing targets to unelected body which has no real understanding of local issues.	Comments noted. It is emphasised that, at this stage, the Regulation 18 consultation document is NOT intended to set out draft policies or proposals for the Four Towns Plan. It is only intended to explore, with key stakeholders (including Parish Councils) what issues and matters the Four Towns Plan should address. It should also be clarified that the Local Plan for East Northamptonshire (for which this Council is the responsible authority), covering Stanwick, will consist of TWO parts: the North Northamptonshire Core Strategy review (which ENC is preparing in partnership with Corby, Kettering and Wellingborough Borough Councils) and the Four Towns Plan.
02025/ENLP _FTP/3/002	02025	Stanwick Parish Council	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	East Northamptonshire Council does not have up to date housing needs survey - new survey should be carried out. Up to date evidence should be used. East Northamptonshire Council should take into account emerging Neighbourhood Plan and Parish Plans.	Comments noted. The Strategic Housing Market Assessment (SHMA) for the North Northamptonshire housing market area was updated during July 2012 by Housing Vision (August 2012). Further, Ward level, housing needs modelling work is also being undertaken during early 2013, in order to assess local housing needs.
02025/ENLP _FTP/3/003	02025	Stanwick Parish Council	Comment	FTP_Q3	Recent evidence base	List of work shown on website includes a number of items yet to be completed - how can any one comment on whether these documents form 'a robust evidence base' if the content is not known. What analysis will be done of existing infrastructure deficits following development in 1990s and subsequently, how and when are these existing deficits going to be rectified prior to further development. Emerging Parish Plans should be used as relevant base documentation.	Comments noted. Parish Plans will form an important resource in preparing the Four Towns Plan. Evidence gathering work is an ongoing process and much progress has been made, although much work is still to be done. The purpose of this consultation question is to ensure that ENC does not miss any relevant local evidence base documentation which other stakeholders (e.g. Parish Councils) may be aware.

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02025/ENLP _FTP/3/004	02025	Stanwick Parish Council	Comment	FTP_Q4	Themes and Topics	<p>Policy outcomes table refers to detailed settlement hierarchy and 'knowledge of our customers and communities'. What input are 'individual settlements' and 'communities' allowed to make. 1st box refers to land allocations for housing and community facilities - how are land allocations determined as Stanwick Parish Council has not been advised of any document that examines this issue. How can East Northamptonshire Council allocate land for housing when not setting housing targets.</p>	<p>Comments noted. Local representatives (including Parish Councils) and community groups are essential stakeholders in the Four Towns Plan preparation process. It is intended that the predominant role of the Four Towns Plan will be to allocate specific sites to meet strategic targets (e.g. for housing, employment or green infrastructure) set out in the North Northamptonshire Core Strategy. It is NOT correct to say that ENC will not be setting housing targets, although ENC will be setting these through the Core Strategy (strategic) part of the Local Plan, as opposed to the Four Towns Plan.</p>
02025/ENLP _FTP/3/005	02025	Stanwick Parish Council	Comment	FTP_Q5	Timetable	<p>Would the plan be sufficiently flexible to be relevant for 20 years. How would changes in intervening period be taken into consideration. Re: Para 7.2 In what format does East Northamptonshire Council want 'input'. What will be acceptable. What assistance to ensure 'input' is viable. Further themes/ topics - community safety - bridge over the A45, traffic volumes, traffic calming. Impact of development immediate vicinity/ surrounding area e.g. resultant traffic flow impact. Greater consideration to needs of rural areas.</p>	<p>Comments noted. Evidence gathering work is an ongoing process and much progress has been made, although much work is still to be done. The purpose of this consultation question is to ensure that ENC does not miss any relevant local evidence base documentation which other stakeholders (e.g. Parish Councils) may be aware. All evidence provides an invaluable insight in putting the Four Towns Plan together.</p>

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02081/ENLP _FTP/3/001	02081	University Hospitals Of Leicester NHS Trust	Comment	N/A		Website reference re Four Towns Plan - address does not link directly to relevant documents. When search is made under 'Four Towns' 116 documents are found with no indication of content or relevance. Dnot consider this to be a consultation - information l effectively buried/ unreasonable to expect anyone to navigate through/ identify what documents are relevant. 'JCS' - context indicates that this is probably common usage. Layout and graphics of web site well done.	Email response to customer
01240/ENLP _FTP/2/001	01240	Cllr Andy Mercer	Object	FTP_Q1	Scope	Last 30-40 years infrastructure deficit developed:1)Green leisure provision is deficient in urban areas - percentage of Rushden devoted to parkland low, compared with Wellingborough.2)Hard leisure insufficient. Enough pubs and clubs, but theatres, night-clubs, cinemas, youth clubs, community centres, etc, are inadequate.3)Rushden's Hayway Clinic has closed, and not replaced.4)Shortage hotel beds.5)Cemetery space needed.6)Secondary education provision inadequate. Government rules claim there are many spare places in school - misleading. E.g. Higham Ferrers Specialist Arts College has classes in portacabins. Government rules for assessing school capacity must be challenged and more robust rules used.7)Allotments must be provided if requested, and despite population growth, capacity has fallen. As the national Green Agenda evolves, demand will increase, and extra capacity must be planned.	NO DATA

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01240/ENLP _FTP/2/002	01240	Cllr Andy Mercer	Object	FTP_Q1	Scope	<p>Need strategic plan for future connectivity of plan area with sub-region and beyond:1)No railway or station. 2)Major highways close to, or at, capacity. Need a vision of how quantum improvement in highway capacity achieved.3)A45 must be duelled least to Thrapston. Roundabouts on A45 must be upgraded, by grade separation. (Should be in the Core Spatial Strategy.) Services at Raunds roundabout need major enhancement, this should be in the Four Towns Plan.4)A6 bypass around Rushden/Higham should be duelled its entire length. (Should also be in the CSS.)5)A6 need enhancement north of A45. (Should also be in the CSS.)6)Bus services are inadequate. Too infrequent, slow and support too few destinations. Restricts access to jobs, as non-drivers find it difficult to get to work beyond 4-5 miles.7)High-speed broadband essential for economic growth. Goals must be set for speed and capacity.</p>	NO DATA
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01240/ENLP FTP/2/003	01240	Cllr Andy Mercer	Object	FTP_Q1	Scope	<p>Need for vision - medium and long-term role:1) Mix of housing?2) If flats acceptable, should minimum standards be specified? (E.g. minimum floor-space, levels of privacy, amenity space?) Apartments popular in foreign capitals, but provide quality of life unrecognisable to resident of British bedsit.3) Aim to attract tertiary education establishment(s)?4) Aim to create 4-Towns Area identity, or try to emphasise individual identities of Towns and villages?5) Degree of out-commuting acceptable? What steps should be taken to realise this goal?6) Aim to have own radio station, or TV station? What steps should be taken to achieve these goals?7) What sports facilities needed? (Already, shortage of playing fields in Rushden, and growth can only exacerbate problem.) What steps should be taken to provide facilities?8) Should planning attempt to control mix of local services? (E.g. limit the number of takeaways, estate agencies?) What range of mixes acceptable, and how would it be controlled? In summary, what place should the Four Towns Area be in 30 years?</p>	NO DATA
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01240/ENLP _FTP/2/004	01240	Cllr Andy Mercer	Object	FTP_Q2	Three Towns and Raunds Area - previous evidence base	2004-2007 studies culminated in document called Three Towns Preferred Options. Document produced with no Councillor involvement. Completely ignored Council's plans, goals and visions. Unwise to use document, as the thrust of it was:1) incompatible with Council's plans, goals and visions2) produced without consulting Councillors3) to override or bypass the wishes of the Council. (C.f. RNOT Plan, submitted to Secretary of State with features expressly removed by Committee, and against direct instructions of Committee.)No document or consultation older than 2008 should be used.Rushden Masterplan must be revisited. (See answer to Question 3.)	NO DATA
01240/ENLP _FTP/2/005	01240	Cllr Andy Mercer	Comment	FTP_Q3	Recent evidence base	Reports quoted have extensive coverage, but could be more robust. In particular, the work done by and for developers of Skew Bridge project is very high standard, and very up-to-date. Strongly recommend using it.If Skew Bridge developed, will cause quantum shift in character of Four Towns Area. Much of research performed prior to Skew Bridge be obsoleted by it, or at least in need of major update.Specific importance is failure to implement Manor Park project Rushden. Masterplan produced by Prince's Trust dependent on project, would have freed up critical Town Centre sites. These sites unavailable, entire premise of Masterplan undermined. Layout of Rushden's town Centre must be revisited.Beyond that, various issues discussed in answer to Question 1 must be addressed. Data needed to support whatever proposals made to address those issues.	NO DATA

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01240/ENLP FTP/2/006	01240	Cllr Andy Mercer	Object	FTP_Q4	Themes and Topics	Policy outcomes do not demonstrate implementation of principles of Localism. Major drivers of policy outcomes meeting central and regional government objectives. E.g.-settlement hierarchy-renewable energy-housing allocations-Gypsy and Traveller sitesLocal input invited in some detail. E.g.-parking standards-locally listed buildings-town centres-housing density mixDetails within range of values prescribed by central government or regional or sub-regional bodies.Local input is to provide detail in implementation of policies that derive from outside Four Towns area.Would not be Local Plan; would be Local component of sub-regional or even regional plan.For Four Towns Plan to be Local, would need to address Local issues. Would be achieved by incorporating various issues listed in answer to Question 1.	NO DATA
01240/ENLP FTP/2/007	01240	Cllr Andy Mercer	Comment	FTP_Q5	Timetable	Bizarre to produce plan covering 2011-2031, in 2013, for adoption in 2014. How can you plan for future 3 years in the past?Any plan that tries to control development that happened 3 years ago is silly.Suggest plan should cover period 2014-2031.	NO DATA
01328/ENLP FTP/1/001	01328	ENC	Comment	FTP_Q4	Themes and Topics	South Northants Interim affordable Housing Policy currently out for consultation - note that they have got a policy in place for market housing on rural exception sites. Consider drafting something for ENC.	Comments noted. Affordable housing policies/ standards will form an important element of the Four Towns Plan.
01328/ENLP FTP/2/001	01328	ENC	Comment	FTP_Q4	Themes and Topics	Sounds positive - question around where to put policy. The RNOTP is already adopted, and it seems a bit excessive to have an interim affordable housing policy to cover this. Possibly something the JCS could cover.	Comments noted. Affordable housing policies/ standards will form an important element of the Four Towns Plan.

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02217/ENLP FTP/1/001	02217	Northants Police	Comment	N/A		Important document which needs to reflect delivery of safer places through planning out crime in communities as they develop. Important that outcome of creating safer places is threaded through document.	Comments noted. The Four Towns Plan will include detailed design policies and principles and will need to take account of relevant guidance, including "Secured by Design".
02217/ENLP FTP/1/002	02217	Northants Police	Comment	FTP_Q1	Scope	Need to include clear policy that delivers community safety and security with SPG for Planning Out Crime in Northamptonshire referred to as site specific policy.	Comments noted.
02217/ENLP FTP/1/003	02217	Northants Police	Support	FTP_Q3	Recent evidence base	Agreed [supporting representation]	Support noted.
02217/ENLP FTP/1/004	02217	Northants Police	Object	FTP_Q3	Recent evidence base	SPG Planning Out Crime in Northamptonshire should be referred to as separate bullet point within para 5.1	Comments noted. The list of key documents is not meant to be exhaustive. Many other sources will be drawn upon throughout the Four Towns Plan preparation process.
02217/ENLP FTP/1/005	02217	Northants Police	Comment	FTP_Q4	Themes and Topics	Criteria based policies should include arson prevention, countering terrorism, Secured by Design and police national Safer Parking Award together with Code for Sustainable Homes/ BREEAM requirements.	Comments noted.
02217/ENLP FTP/1/006	02217	Northants Police	Comment	FTP_Q4	Themes and Topics	Good quality of life should reinforce vision of creating safe, strong and cohesive sustainable communities where people are actively involved in shaping places where they live to reduce crime/ fear of crime and anti-social behaviour. Should also refer to provision of infrastructure/ how communities will be policed.	Comments noted
02217/ENLP FTP/1/007	02217	Northants Police	Support	FTP_Q5	Timetable	Yes [supporting representation]	Support noted

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02223/ENLP _FTP/1/001	02223	The Wildlife Trust	Comment	FTP_Q3	Recent evidence base	Number of existing environmental assets (species, habitats, designated sites, Green Infrastructure, etc.) in biodiversity / geological / ecological sense that already exist within area of Four Towns Plan - potential/ opportunity to expand upon, and complement/ support, these in future.	Comments noted. Maps will provide a useful resource in identifying/ designating natural environment sites through the Four Towns Plan.
02223/ENLP _FTP/1/002	02223	The Wildlife Trust	Comment	FTP_Q3	Recent evidence base	Part of Four Towns Plan area now lies within new Nene Valley Nature Improvement (NIA) zone around River Nene corridor. Further advice can be sought from NIA Natural Development Officer, hosted by NCC.	Comments noted
02223/ENLP _FTP/1/003	02223	The Wildlife Trust	Comment	FTP_Q4	Themes and Topics	Wildlife Trust has recently purchased/ taken on direct management of 115 ha Nature Reserve - "Irthlingborough Lakes and Meadows" below Irthlingborough inside Nene Valley NIA zone/ majority of the Nature Reserve is also inside the SPA as well. Further advice can be sought from Nene Valley Project Manager at The Wildlife Trust.	Comments noted
03109/ENLP _FTP/2/001	03109	Bedford Borough Council	Support	FTP_Q1	Scope	Scope appears to be comprehensive in light of anticipated scope of emerging Core Strategy.	Support noted

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03109/ENLP _FTP/2/002	03109	Bedford Borough Council	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	<p>Consideration of available evidence indispensable to ensuring adequate, up-to-date and relevant evidence about economic, social and environmental characteristics and prospects of Four Town area. Economic land allocations/ land allocations for housing should respond to and be soundly based on locally identified needs for housing and land or floor space for economic development. For plan to be deliverable evidence base should demonstrate that sites to be allocated and scale of development are viable; therefore include viability testing for plan making in current market conditions in addition to viability work that has been carried out as part of CIL.</p>	<p>Noted. It will be necessary to consider undertaking further bespoke viability assessment work once most of the draft policies are written.</p>
03109/ENLP _FTP/2/003	03109	Bedford Borough Council	Comment	FTP_Q3	Recent evidence base	<p>Scope of Four Towns Plan includes allocation of gypsy and traveller sites - policy outcome 6 (p10). Emerging evidence base should include North Northamptonshire Gypsy and Traveller Accommodation Assessment update 2011. Paragraphs 7-11 of 'Planning for Traveller Sites' provide guidance on gypsy and traveller accommodation provision and are relevant to plan-making. Otherwise, list of documents set out under 5.1 of appears to comprise relevant and up-to-date evidence. However, evidence base must continually evolve alongside plan and respond to emerging issues.</p>	<p>Comments noted. Clearly, the 2011 GTAA represents a key evidence base document and its recommendations (together with national planning policy and the emerging Core Strategy targets) should form the basis by which Gypsy and traveller sites should be designated/ allocated.</p>

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03109/ENLP _FTP/2/004	03109	Bedford Borough Council	Comment	FTP_Q3	Recent evidence base	Section 158 (National Planning Policy Framework) requires local planning authorities to ensure assessment of housing, employment and other uses are integrated. Housing market area of Four Towns area overlaps northern part of Bedford Borough and includes villages of Upper Dean, Swineshead, Podington and Wymington. Bedfordshire and Luton Strategic Housing Market Assessment March 2010 should therefore be taken into account. Any update to Strategic Housing Market Assessment July 2012 should involve cooperation with Bedford Borough Council.	Comments noted. Bedfordshire and Luton SHMA should also be considered in preparing detailed Four Towns Plan housing policies.
03109/ENLP _FTP/2/005	03109	Bedford Borough Council	Comment	FTP_Q4	Themes and Topics	Inclusion of additional themes, topics and subjects should respond to emerging Joint Core Strategy review.	Noted
03109/ENLP _FTP/2/006	03109	Bedford Borough Council	Support	FTP_Q5	Timetable	Paragraph 157 (National Planning Policy Framework) states that local plans should be drawn up over appropriate time scale, preferably 15-year horizon, take account of longer term requirements, and be kept up to date. Given that Four Towns Plan is based on North Northamptonshire Joint Core Strategy, it is appropriate to include same time horizon to 2031.	Support noted

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01657/ENLP _FTP/3/001	02453	Mr Peter Mommersteeg	Comment	N/A		<p>Aspirational site for development in Chelveston cum Caldecott and Caldecott in particular. Suggest area (0.9ha) be incorporated into village envelope/ Neighbourhood Development Plan. Proposal for ribbon development between Church House and the junction of Caldecott Road and Bidwell Lane. Revision of village confine would enable potential future housing development. Proposal would integrate village hall/ school house, Church and other three houses with Caldecott providing natural link. Proposal would take account of rural environment/ accommodate existing footpath. Also fit with development at Duchy Farm.</p>	<p>Thank you for your email and information. We will consider this, in due course as we prepare the Four Towns Plan. For reference, para 7.2 of the attached current consultation provides the proposed preparation timescale for the Four Towns Plan. <a href="http://www.east-northamptonshire.gov.uk/downloads/Item_7_Four_Towns_Plan_Reg.18_Consultation_Report_1_.pdf">http://www.east-northamptonshire.gov.uk/downloads/Item_7_Four_Towns_Plan_Reg.18_Consultation_Report_1_.pdf</a></p>
02453/ENLP _FTP/1/002	02453	Mr Peter Mommersteeg	Comment	N/A		<p>Considering any revision to existing village envelope, only recent major development has been refurbishing/ sale of 50 dwellings at Chelston Rise with developer actively reviewing addition of further 30 new houses. Prior to that, housing development has been contained in Chelveston and Caldecott within tightly drawn village envelope. This followed bigger developments some 40 years ago (60/70s) at Duchy/ Britten Close.</p>	<p>Thank you for your email and information. We will consider this, in due course as we prepare the Four Towns Plan. For reference, para 7.2 of the attached current consultation provides the proposed preparation timescale for the Four Towns Plan. <a href="http://www.east-northamptonshire.gov.uk/downloads/Item_7_Four_Towns_Plan_Reg.18_Consultation_Report_1_.pdf">http://www.east-northamptonshire.gov.uk/downloads/Item_7_Four_Towns_Plan_Reg.18_Consultation_Report_1_.pdf</a></p>

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02554/ENLP _FTP/2/001	02554	Civil Aviation Authority	Comment	N/A		Other than consultation required by Section 110 of the Localism Act 2011, it is not necessary to consult the CAA about:- Strategic Planning Documents (e.g. Local Development Framework and Core Strategy documents) other than those with direct aviation involvement (e.g. Regional Renewable Energy Plans)- Waste Plans- Screening Options etcIn all cases where the above might affect an airport, airport operator/ NATS is appropriate consultee. Where consultation is required under Section 110 of the Localism Act 2011 CAA will only respond to specific questions (but will nevertheless record receipt of all consultations).	Database updated and letter circulated to appropriate development management officers.
02567/ENLP _FTP/3/001	02567	Sport England	Support	FTP_Q1	Scope	Yes [supporting representation]	Support noted.
02567/ENLP _FTP/3/002	02567	Sport England	Object	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Sport England considers strategies in excess of 3 years old without review out of date - not up to date re paragraph 73 of NPPF	Comments noted
02567/ENLP _FTP/3/003	02567	Sport England	Comment	FTP_Q3	Recent evidence base	If out of date would not be considered robust	Comments noted
02567/ENLP _FTP/3/004	02567	Sport England	Comment	FTP_Q5	Timetable	Evidence base needs to be updated to ensure it is future proofed to 2031	Comments noted

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01406/ENLP _FTP/1/001	01406	Barwood Land And Estates Ltd	Comment	FTP_Q1	Scope	<p>Barwood Land seeking to promote Sustainable Urban Extension (SUE) through Development Plan process. Would comprise Northdale End/ West End and remaining land between two sites ('Middle End'). Northdale End/ West End could form part of larger SUE or stand alone sustainable additions. Plans emerged in response to adopted CSS which identifies Raunds as Rural Service Centre where one/ more SUEs seen as necessary to meet future needs of settlement. Given role as landowner/ promoter, company (Barwood Land) has positive/ significant part to play in contributing to future development in Four Towns area.</p>	<p>Comments noted. Barwood Land's role as a major land agent/ potential developer around Raunds is recognised and the role of the company as a key stakeholder is acknowledged.</p>
01406/ENLP _FTP/1/002	01406	Barwood Land And Estates Ltd	Comment	FTP_Q1	Scope	<p>Agree with importance of detailed spatial plan which covers Four Towns area. Greater certainty over future investment; important that JCS reasonably finalised to be able to frame correctly FTP policies. JCS - key areas such as job creation, delivery of infrastructure and housing growth yet to be crystallised as evidence base still being gathered. Barwood supports plan for Four Towns area, but cautious that FTP does not advance too far ahead of JCS as danger that policies will become inconsistent. Recommends that FTP policies not fully formed until evidence base for JCS completed/ policies finalised. JCS submission draft unlikely to be ready until July 2013.</p>	<p>Comments noted. It is not considered appropriate to progress the FTP in advance of the JCS review.</p>

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01406/ENLP FTP/1/003	01406	Barwood Land And Estates Ltd	Comment	FTP_Q4	Themes and Topics	Important that policies reflect principles contained within National Planning Policy Framework (NPPF), in particular presumption in favour of sustainable development. Planning Inspectors have inserted presumption into (recent) Local Plans and in case of FTP it would ensure that pro-growth agenda is fully incorporated into document.	Comments noted. NPPF will clearly form a major consideration in devising specific policies and proposals for the Four Towns Plan.
01406/ENLP FTP/1/004	01406	Barwood Land And Estates Ltd	Comment	FTP_Q1	Scope	Agree with broad scope of FTP. Policies should not be fully developed until JCS evidence base/ policies finalised once submission draft of JCS published. Overall housing and job creation figures need to be reflected in FTP to ensure consistency and explain how they are to be applied/ implemented at local level; how projected housing levels/ employment land requirements are applied to towns like Raunds - certainty over future investment.	Comments noted. Information, such as JCS targets would need to be included within supporting text within the FTP document, in order to set the scene/ context for the Plan.
01406/ENLP FTP/1/005	01406	Barwood Land And Estates Ltd	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	FTP needs to utilise all evidence available, including information used to support developments approvals in Four Towns area such as Northdale End/ West End. In case of Raunds, evidence gathered to support Raunds Area Plan remains relevant as this information covers issues that have changed little. Key documents which should be taken into account: Employment Report (Atkins, March 2009 in support of Barwood Land's proposals); Strategic Employment Land Assessment (SELA) - issue of out-commuting in Raunds/ suggesting strategy which involves development of employment sites to north of town.	NO DATA

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01406/ENLP _FTP/1/006	01406	Barwood Land And Estates Ltd	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Key task is deciding weight to be placed on different evidence. Technical reports/ studies that have been based on authoritative/ robust information should be afforded most weight whilst other documents such as Raunds Masterplan should only be given limited weight - conclusions not based on reliable technical evidence/ assessment - deficiencies highlighted in Northdale End appeal decision.	Comments noted. Policies will take account of all relevant evidence base documents.
01406/ENLP _FTP/1/007	01406	Barwood Land And Estates Ltd	Object	FTP_Q3	Recent evidence base	FTP consultation document has missed Council's Urban Extensions Study (December 2006). Should be included as provides important information for growth around Raunds. Remains relevant/ not superseded by further reports/ studies. FTP should also take into account evidence produced for JCS given relationship between documents. SELA/ Atkins Employment Report for Raunds are key evidence which highlight issue of out-commuting/ provide strategy for addressing issue. Consultation document fails to acknowledge how updated Employment Land Review will relate to SELA.	Noted. The emerging Employment Land Review update will supplement and support the SELA, through providing a focus upon the existing portfolio of employment land, an issue not addressed through the SELA.
01406/ENLP _FTP/1/008	01406	Barwood Land And Estates Ltd	Comment	FTP_Q4	Themes and Topics	FTP will need to be informed by emerging JCS/ elaborate on JCS policies. Although Policy outcomes in consultation document appear to do this based on current draft JCS this could be subject to further change - await finalised version of JCS before fixing Policy Outcomes.	Comments noted. Given ENC's recently approved ambitious Local Development Scheme timetable for the Four Towns Plan (22 October 2012), it is essential that progress is made with the Four Towns Plan, in order that this may be submitted to the Secretary of State as soon as possible following submission of the JCS review.
01406/ENLP _FTP/1/009	01406	Barwood Land And Estates Ltd	Support	FTP_Q5	Timetable	Imperative that FTP covers same period as JCS - consistency/ ensure there is no conflict between two Development Plan Documents.	Support noted

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01573/ENLP FTP/5/001	01573	Natural England	Support	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Agree this seems reasonable approach.	Support noted
01573/ENLP FTP/8/001	01573	Natural England	Comment	FTP_Q3	Recent evidence base	Note that Open Spaces Strategy to be updated - refer to NE report on delivering and managing natural/semi-natural greenspace "Nature Nearby - Accessible Natural Greenspace Guidance" (Natural England 2010) - <a href="http://publications.naturalengland.org.uk/publication/40004">http://publications.naturalengland.org.uk/publication/40004</a> .	Noted. The website will set out links to ALL relevant evidence base documents.
01573/ENLP FTP/10/001	01573	Natural England	Support	FTP_Q4	Themes and Topics	Document appears to have summarised main policy outcomes Natural England would wish to see included.	Support noted
01657/ENLP FTP/2/001	01610	Northamptonshire County Council	Support	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Appropriate approach provided a comprehensive search is made for updated information mentioned.	Noted. Evidence will be gathered throughout formal consultation process for the Four Towns Plan, together with locally gathered information (e.g. through Community or Neighbourhood Plans).
01641/ENLP FTP/2/001	01641	Network Rail	Support	FTP_Q1	Scope	Yes [supporting representation]	Support noted
01641/ENLP FTP/2/002	01641	Network Rail	Support	FTP_Q2	Three Towns and Raunds Area - previous evidence base	Yes [supporting representation]	Support noted

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01641/ENLP FTP/2/003	01641	Network Rail	Comment	FTP_Q3	Recent evidence base	East Midlands Route Utilisation Strategy February 2010 Emerging Long Term Planning Process (LTPP) market studies as they are published in 2013	Noted
01641/ENLP FTP/2/004	01641	Network Rail	Comment	FTP_Q4	Themes and Topics	Transport and impact on rail demand/ services. Evidence from East Midlands Route Utilisation Strategy February 2010 and LTPP Market Studies as they are published in 2013.	Noted
01641/ENLP FTP/2/005	01641	Network Rail	Support	FTP_Q5	Timetable	Yes [supporting representation]	Support noted
01650/ENLP FTP/1/001	01650	Podington Parish Council	Comment	N/A		Please note - not now the Clerk to the Council and that you should resend the letter to the new Clerk - Mrs N Daft. If possible, please ensure that this change is made on any database of Parish Council Clerks which includes Podington Parish Council.	Database updated in response to Graham Hayes' email
01652/ENLP FTP/1/001	01652	Northants County Council	Comment	N/A		Received correspondence addressed to County Council at PO Box no address. Please note postal address no longer contains PO Box; therefore amend mailing lists as appropriate.	Database updated in response to NCC email
01656/ENLP FTP/1/001	01656	Natural England	Comment	N/A		Received consultation for Four Towns Plan Site Specific Development (MB/FTP) by post on 15th November. Will respond to consultation within statutory response times and Customer Service standards: within 6 weeks from the receipt of your email.	Response already received from relevant Natural England department (Land Use Operations Team - Nottingham). No need for further action, but update database to reflect current consultation details/ arrangements.

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01657/ENLP _FTP/4/001	01657	Northants County Council	Comment	FTP_Q3	Recent evidence base	<p>Ecological information becomes out of date quickly, need to be updated for evidence base; some should be available from Northamptonshire Biodiversity Records Centre. Northamptonshire Biodiversity Partnership created biodiversity opportunity map - identifies opportunities for habitat creation and restoration in Nene Valley should be considered. County lists of Potential Wildlife Sites and Local Wildlife Sites routinely updated and current GIS layers should also be included in evidence base. Both available from Wildlife Trust. Section 5 consultation document refers Open Space Strategy and Infrastructure Development Plan. Some items within these documents were to be resourced partly or wholly by planning obligations. Some projects are included in draft Community Infrastructure Levy Regulation 123 list for East Northamptonshire currently out for consultation. In light of new restrictions regarding use of s106 funds (i.e. more rigorous application of 'three tests') project lists should be reviewed to ensure that projects targeted for s106 funding be Regulation 122 compliant.</p>	Noted
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**APPENDIX 1: Schedule of representations received through Four Towns Plan Regulation 18 Consultation (2 November - 17 December 2012, inclusive)**

01657/ENLP FTP/5/001	01657	Northants County Council	Support	FTP_Q4	Themes and Topics	<p>Much of Four Towns Plan area within Nene Valley NIA, NIA objectives should be integral to new Plan policies. Objectives are:1. Support, value and benefit natural environment through growth, development, resulting in net gain in biodiversity by 20202. Enhance public awareness, access and benefits of NIA in sustainable and sympathetic way, ensuring designated sites at core of NIA remain in favourable condition3. Improve ecological status of river and enhance ecosystem service provision4. Strengthen ecological network through effective management with farmers/landowners5. Investigate potential to market ecosystem services provided by Nene Valley.</p>	Wholly agree. NIA designation will form an important consideration in defining specific policies and proposals affecting the Nene Valley.
01657/ENLP FTP/6/001	01657	Northants County Council	Support	FTP_Q5	Timetable	<p>Would be appropriate time frame and allow next Four Towns Plan review to take place in conjunction with next Core Strategy review, facilitating close alignment of policies.</p>	Support noted
01657/ENLP FTP/1/001	01657	Northants County Council	Support	FTP_Q1	Scope	<p>Range of proposed policies is broadly sufficient, would like to see included reference to natural environment (as distinct from 'open space', especially in relation to the Upper Nene Valley Gravel Pits Special Protection Area) and heritage assets (e.g. archaeology and historic environment). The Four Towns Plan need to consider Nene Valley Nature Improvement Area (NIA) designated by Defra in March 2012. Much of the Four Towns Plan within the NIA which runs from Daventry to Peterborough, includes the River Nene and its main tributaries.</p>	Noted

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01659/ENLP _FTP/1/001	01659	Courtyard Hotel	Comment	FTP_Q4	Themes and Topics	<p>Courtyard - area of site is 1.87 acres (.757ha)/ original property was known as Rutland Lodge - extended/ improved over years. First part of Hotel built as conversion from old garage to 6 bedroom annex. First guests arrived February 2004/ AA Inspector awarded 5 stars for guest accommodation (May 2004). Subsequently expanded from a guest house to Hotel. Currently offer accommodation in 20 luxury en-suite rooms/ guest lounge/ self contained banqueting suite popular for weddings (licensed for civil ceremonies), seats 120 - meeting/ conference facilitie/ bar/ 50 seater restaurant. Now employ 45 people in a full and part time basis.</p>	<p>Comments noted. The Four Towns Plan, as required by the NPPF, will need to ensure that sustainable economic growth is supported.</p>
01659/ENLP _FTP/1/002	01659	Courtyard Hotel	Comment	FTP_Q4	Themes and Topics	<p>Purchased the 8.46 acre (3.42 hectares) field opposite our hotel on March 26th 2012/ would like to use some of it to expand hotel:a. Additional parking to prevent cars parking in West Streetb. Additional bedroomsc. Staff/owners accommodationd. Gym/Spa/Beauty Treatmentse. Green space - maintain majority of the 8.46 acres and would include provision of new public access across the north end of the field/ offer opportunity to access bridle path known as Cotton Lane. Remainder of the open space would offer grazing/stabling for horses and possibly small riding school if/when the bridge over the A45 is built.</p>	<p>Comments noted. Specific development land allocations will be considered through the Four Towns Plan, including in/ around Stanwick.</p>

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01659/ENLP _FTP/1/003	01659	Courtyard Hotel	Comment	FTP_Q4	Themes and Topics	<p>ADVANTAGES OF PROPOSALS</p> <ol style="list-style-type: none"> <li>1. Site already has all main services passing through - gas, water, electricity. main foul sewer which terminates at the pumping station adjacent</li> <li>2. Established vehicular access from West Street just off the A45 and another at north of site.</li> <li>3. Tourism. Over 2m people visiting Northamptonshire - benefit local economy, not enough hotel rooms to accommodate them.</li> <li>4. Employment - 45 people in full/ part time basis rising to 60 plus.</li> <li>5. Location - adjacent to Stanwick Lakes just off the A45. Would further compliment this especially when the footbridge is constructed.</li> <li>6. Benefits for existing/ proposed local businesses - confident that existing businesses in locality will support proposals.</li> </ol>	<p>Comments noted. The Four Towns Plan, as required by the NPPF, will need to ensure that sustainable economic growth is supported.</p>
01659/ENLP _FTP/1/004	01659	Courtyard Hotel	Comment	FTP_Q2	Three Towns and Raunds Area - previous evidence base	<p>Field designated on the plan for Stanwick to be retained to "preserve the village setting". However now partially visually obscured by hedges/ area plan now outdated. Village framework should be extended to encompass hotel and areas in field opposite that would be used for development. The 30mph sign moved some years ago for safety reasons - not reflected in village boundaries.</p>	<p>Comments noted. It is correct that the Raunds Area Plan is now effectively "defunct". The Four Towns Plan will represent an entirely new Development Plan Document for Stanwick and issues such as the detailed spatial strategy for Stanwick (including whether growth beyond the current built up area would be acceptable) will be determined through the Four Towns Plan.</p>

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<b>Comment Ref</b>	<b>Customer Ref</b>	<b>Respondent Name</b>	<b>Representation Type</b>	<b>Paragraph Title</b>	<b>Comment Text</b>	<b>Response Text</b>
00223/ENL P_FTSA/9/ 001	00223	English Heritage	Comment	N/A	EH has produced guidance on SEA/SA, currently being updated to reflect changes in planning/ developing practice. Assessment process should consider potential effect on significance of heritage assets; principles set out in NPPF paras 132-135. Setting of heritage assets is important consideration, as well as possible direct/ indirect impacts on historic environment arising from implementation of plan; may be beneficial as well as potentially harmful effects. EH published guidance on setting, 2011: <a href="http://www.english-heritage.org.uk/publications/setting-heritage-assets/">http://www.english-heritage.org.uk/publications/setting-heritage-assets/</a>	Noted. Changes to Scoping Report will be made, to include links to recent English Heritage guidance.
00223/ENL P_FTSA/9/ 002	00223	English Heritage	Object	Baseline data	Editorial problem - text largely superseded by text on Landscape and Cultural Heritage at paragraphs 3.83-3.88. Clearly inaccurate, as stated in 3.25, that plan area only contains limited number of heritage assets.	Noted. Paragraphs 3.25-3.26 will be revised to take account of EH comments.
00223/ENL P_FTSA/9/ 003	00223	English Heritage	Comment	Cultural Heritage	Recommend terminology in NPPF/ National Heritage List for England, i.e. 'heritage assets' and 'scheduled monuments'. Table 4 should include No of conservation areas. Heritage assets include both designated and undesignated assets. Latter includes locally listed buildings/ archaeology; County Archaeologist will be able to advise if nationally important archaeology in area.	Noted. Paragraphs 3.86-3.88 will be reviewed/ revised (as necessary) to take account of EH comments.
00223/ENL P_FTSA/9/ 004	00223	English Heritage	Object	Heritage at risk	Reference should be made to 'heritage at risk'; Stanwick Hall/ Crow Hill Iron Age hillfort/ associated Iron Age, Roman and Medieval settlements at Irthingborough are on 2012 national register and lie within study area. May be other Grade II/ undesignated heritage assets that have been identified as being 'at risk'. May be opportunities, through planning process, to identify ways of conserving heritage at risk.	Noted. Further text will be added to 'Cultural Heritage' (paragraphs 3.86-3.88) to take account of EH comments.
00223/ENL P_FTSA/9/ 005	00223	English Heritage	Support	N/A	Happy with proposed SA objectives for Landscape and Cultural Heritage.	Support noted.

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00223/ENL P_FTSA/9/ 006	00223	English Heritage	Comment	Monitoring	Await further information on monitoring indicators and how these will relate to plan monitoring indicators.	Noted. Further information regarding monitoring indicators will be provided in full SA report.
00250/ENL P_FTSA/4/ 002	00250	Environment Agency	Comment	N/A	Refer to forthcoming Defra sponsored Nene Integrated Catchment Management Plan currently being produced by River Nene Regional Park. Both NIA and Catchment Plan seen as priorities for Northamptonshire Local Nature Partnership (LNP).	Comments noted. Both documents need to be added to Appendix 1 of Draft SA Scoping Report.
00250/ENL P_FTSA/4/ 003	00250	Environment Agency	Comment	N/A	Water Framework Directive (WFD) came into force December 2000/ transposed into UK law in December 2003. 1st principle to prevent deterioration in aquatic ecosystems. No deterioration requires that water body does not deteriorate from current ecological/ chemical classification, and applies to individual pollutants within water body. Four Towns Plan must take requirements of WFD into account.	Comments noted. Greater prominence to WFD ought to be given in the SA Scoping Report, when finalised.
00250/ENL P_FTSA/4/ 004	00250	Environment Agency	Object	N/A	Following text to be included under Water Quality and Resources heading of SA/ included within future plan: 'New activities need to be deterred in certain areas based on their intrinsic high hazard to groundwater. The hazard may result from a combination of the activity type, its duration and the potential for failure of controls. Close to sensitive receptors a precautionary approach is likely to be taken even where the risk of failure is low, the consequences may be serious or irreversible. A priority is to protect water supplies intended for human consumption. We designate Source Protection Zones (SPZs) around these groundwater supplies. In SPZ1 where the risk is greatest, we will object in principle to, or refuse to permit, some activities. Outside SPZ1 we will apply risk-based regulation approach. Within this core strategy area there are a number of SPZs.' Best practice/ suitable reference: 'Groundwater Protection: Policy and Practice (GP3) Part 1-5 (Revisions to Parts 4 and 5 are currently being finalised)'.	Agree with comment. Changes to Draft SA Scoping Report to be made, in accordance with EA suggestions.

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00250/ENL P_FTSA/4/ 005	00250	Environment Agency	Comment	N/A	Area of Four Towns contains several sections of Main River, River Nene, Knuston Brook, Chelveston Brook and Hog Dyke. Also ordinary watercourses which drain surrounding land to Main Rivers. Main rivers have flood zones but absence of flood zones for ordinary watercourse does not mean they do not have potential to cause flooding.	Comments noted. Main Rivers should be listed within the "Water Quality and Resources" section of the SA Report.
00250/ENL P_FTSA/4/ 006	00250	Environment Agency	Comment	N/A	Hope that development in area would consider need not only that flood risk does not increase, but seek to actively reduce flood risk/ provide betterment wherever possible - para 100, National Planning Policy Framework (NPPF). Appropriate to investigate possibilities to enhance watercourse corridor biodiversity, as well as contribute to achieving Water Framework Directive aims of improving ecological status of waterbody.	Comments noted. "Water Quality and Resources" section of SA Scoping Report should also include explicit reference to NPPF para 100.
00250/ENL P_FTSA/4/ 007	00250	Environment Agency	Comment	N/A	Although Environment Agency will remain concerned with flooding from main rivers, Lead Local Flood Authority (Northamptonshire County Council) is lead for local flood risk which includes groundwater, surface water and ordinary watercourses.	Comments noted. Include specific reference to EA/ LLFA responsibilities under 2010 Floods and Water Management Act.
00250/ENL P_FTSA/4/ 008	00250	Environment Agency	Comment	N/A	Four Towns Plan placed to play vital role in managing surface water runoff/ reducing risk of SW flooding. Achieve through understanding at local level of existing SWF issues/ recommending action to alleviate/ resolve. Plan can go further/ actively promote sustainable methods of drainage that ensure surface water runoff does not increase as result of new development. Strongly recommended Plan includes strong support Sustainable Drainage Systems (SuDS) - multiple environmental benefits; reducing flood risk from surface water, biodiversity, amenity and water quality.	Comments noted. Include specific reference to EA/ LLFA responsibilities (e.g. new statutory SuDS consent regime) under 2010 Floods and Water Management Act.
00250/ENL P_FTSA/4/ 009	00250	Environment Agency	Comment	N/A	Ciria C697 (SuDS Manual)/ Part H (Building Regulations 2000) - working practice for surface water drainage considerations. Recommendations within Neighbourhood Plans must conform to/ complement local planning policy/ Lead Local Flood Authority's aims re role as SuDS Approval Body.	Comments noted. Both documents need to be added to Appendix 1 of Draft SA Scoping Report.

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00250/ENL P_FTSA/4/ 010	00250	Environment Agency	Object	N/A	Would like following text to be included under Soil and Land heading/ future plan: 'The consideration of land contamination, protection and enhancement of controlled waters via the planning regime has always been a key material consideration. However in many instances consideration of land contamination and controlled waters at planning stage is too late. Groundwater in particular, is not a boundary issue and ensuring an area wide holistic approach when considering such a valuable resource is much more effective at strategic 'design' stage. We promote the redevelopment of brownfield sites where possible. Where development is proposed on a site which is known or has the potential to be affected by contamination, a preliminary risk assessment should be undertaken. Preliminary assessments, and any subsequent additional information should be carried out in accordance with the Environment Agency's Contaminated Land Report 11 (CLR 11) 'Model Procedures for the Management of Land Contamination'.	Agree with comment. Changes to Draft SA Scoping Report to be made, in accordance with EA suggestions. Suitable reference to land contamination issues within the context of brownfield site redevelopment will need to be included within the relevant supporting text in the Four Towns Plan itself.
00250/ENL P_FTSA/4/ 011	00250	Environment Agency	Comment	N/A	Land contamination information - 'Guiding Principles for Land Contamination' documents available at <a href="http://www.environment-agency.gov.uk/research/planning/121619.aspx">http://www.environment- agency.gov.uk/research/planning/121619.aspx</a>	Comments noted. Document needs to be added to Appendix 1 of Draft SA Scoping Report.
00250/ENL P_FTSA/4/ 012	00250	Environment Agency	Support	N/A	EA role to provide advice/ support to businesses, public sector etc to help adapt to changing climate. Aim to help key sectors increase resilience to climate risks: working closely with Defra as part of Climate Ready - Government's national programme for adaptation. Pleased to see Energy and Climate Change considered and hope future plan will encourage further development that would address climate change. Welcome opportunity to provide advice on future development within Four Towns Plan area.	Support noted

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00250/ENL P_FTSA/4/ 001	00250	Environment Agency	Comment	N/A	Plan should have regard to NIA. Nene Valley chosen as one of 12 flagship nature areas for England - Government funding to make Nene Valley better for wildlife, people, economy. NIA (41,350ha) contains fragmented ecological network of statutory/ non-statutory sites, including Upper Nene Valley Gravel Pits Ramsar Site/SPA/SSSI). Many pressures on NIA, located in growth area - built development, increasing inappropriate public access, and competition for water resources. Land management practices threaten ecosystem services/ connectivity of habitats. Nene Valley NIA Partnership formed to enable strategic/ joined up approach - coalition of experts including new partners etc. Would welcome opportunity to discuss NIA/ work being undertaken/planned within Four Towns Plan area.	Agree with comments. SA/ SEA Scoping Report will need to be revised/ updated to include specific references to Nene Valley NIA.
01573/ENL P_FTSA/11 /001	01573	Natural England	Support	N/A	Natural England generally considers Scoping Report correctly identifies main sustainability issues within Four Towns area	Support noted
01573/ENL P_FTSA/12 /001	01573	Natural England	Comment	N/A	Welcome section and consider it provides comprehensive baseline information. However like to see information on the Upper Nene Valley Nature Improvement Area included. NIA contains fragmented ecological network of statutory and non-statutory sites including Upper Nene Valley Gravel Pits SPA/ SSSI. Objective of NIA designation is to reverse decline in biodiversity/ restore ecological network in Nene Valley. Also help to meet challenges of growing population, changing climate, and need to produce food while realising complimentary benefits that create naturally functioning interlinked landscape. Upper Nene Valley Gravel Pits SPA forms core of NIA.	Agree with comments. Later drafts of Sustainability Appraisal Report will contain specific references to the NIA designation.
01573/ENL P_FTSA/12 /002	01573	Natural England	Object	N/A	Concerned about impact that proposed level of new development in Four Towns area will have upon Upper Nene Valley (SPA) and other protected sites. Habitats Regulations Assessment will be assessing impact of proposed developments on European sites to ensure requirements of Habitats Regs can be met. Ensure Sustainability Appraisal also gives full consideration to impact of new development on nature conservation value of area.	Comments noted. It must, however, be remembered that the Four Towns Plan forms one part of the Local Plan for East Northamptonshire. It will effectively function as one delivery mechanism for the overall strategic element of the Local Plan, set through the North Northamptonshire Joint Core Strategy.

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01573/ENL P_FTSA/12 /003	01573	Natural England	Comment	N/A	Welcome emphasis SA puts on landscape character approach. Natural England want character of all landscapes conserved and enhanced and would encourage an approach where locally valued landscapes are defined by LPA/ local communities. Glad to see tranquillity mentioned as key sustainability issue - important landscape attribute. Consideration should be given to see if there are any places within the Plan area that could be identified which have remained relatively undisturbed by noise and are prized for recreational/ amenity value.	Comments noted. ENC will work with Natural England/ The Wildlife Trust to identify any sites which would fulfil these criteria.
01573/ENL P_FTSA/12 /004	01573	Natural England	Comment	N/A	Glad to see need for significant investment in upgrading waste water treatment capacity and sewage networks identified as essential that good water quality standards are achieved for conservation of Upper Nene Valley SPA/ nature conservation sites in general.	Support noted
01573/ENL P_FTSA/12 /005	01573	Natural England	Comment	N/A	Note area of Grade 2 agricultural land west of Irthlingborough and between Raunds, Stanwick and Chelveston. This falls in within category of best/ most versatile land (BMV) in the Agricultural Land Classification. If developed it will have irreversible adverse (cumulative) impact on finite national/ local stock of BMV land. Avoiding loss of BMV land is priority as mitigation rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. Longer term, protection of BMV land may reduce pressure for intensification of other land.	Comments noted. Agricultural land quality is one factor in assessing individual potential development sites through the SHLAA/ more detailed site assessment work.
01573/ENL P_FTSA/12 /006	01573	Natural England	Comment	N/A	Supportive - green infrastructure should underpin development at earliest stages. However suggest in this section or separate section that importance of access to green space and provision of open spaces is included.	Support noted. Changes/ revisions to the SA/ SEA Scoping Report will be made in accordance with Natural England guidance.

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01573/ENL P_FTSA/12 /007	01573	Natural England	Comment	N/A	Emphasise the importance of good quality local accessible green spaces as they can offer a range of benefits, e.g. - Access to local greenspace can reduce health inequalities - Increased and improved accessibility to greenspace can help increase physical activity - Contact with greenspace can help improve health and wellbeing - Green space contributes to functioning ecosystem services - positive influence on health. Ecosystem services can assist in adapting to extremes of climate change, e.g. green areas have less heat-island effect than built up areas. - Improve air quality/ respiratory irritants. Function ecosystem services can also mitigate risks associated with flooding from extreme rainfall events.	Comments noted. Changes/ revisions to the SA/ SEA Scoping Report will be made in accordance with Natural England guidance.
01573/ENL P_FTSA/12 /008	01573	Natural England	Comment	N/A	Accessible semi-natural greenspace within green infrastructure in/ around urban areas significantly contributes to creating places where people want to live and work- vital to sustainable development and communities. Natural England's Accessible Natural Greenspace Standards (ANGSt) provides benchmarks for ensuring adequate access to natural/ semi-natural greenspace near to where people live. ANGSt methodology provides tool in assessing current levels of accessible natural greenspace/ planning for better provision. Most recent standard is: - No person should live more than 300m from their nearest area of accessible natural green space of at least 2ha; - One 20ha accessible natural green space within 2km from home; - One 100ha accessible green space site within 5km; - One 500ha accessible natural green space site within 10km; - 1ha statutory Local Nature reserve per 1000 population.	Comments noted. Natural England ANGSt standards will be an important measure in assessing access to natural/ semi-natural green space.
01573/ENL P_FTSA/12 /009	01573	Natural England	Comment	N/A	Other national standards - Green Flag for parks and open spaces and County Park accreditation schemes. Further information on delivering/ managing natural and semi-natural greenspace can be found in Nature Nearby - Accessible Natural Greenspace Guidance (Natural England 2010) - <a href="http://publications.naturalengland.org.uk/publication/40004">http://publications.naturalengland.org.uk/publication/40004</a> .	Comments noted. Natural England ANGSt standards will be an important measure in assessing access to natural/ semi-natural green space.

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01573/ENL P_FTSA/12 /010	01573	Natural England	Object	N/A	Would like Sustainability Appraisal to give greater consideration to recreational provision - does not seem to be covered in baseline information. Natural England encourages enjoyment of natural environment and access to the countryside provided no adverse impact on protected nature conservation sites. Public Rights of Way network is valuable resource for both countryside recreation and to health/ well being and should be given consideration in SA.	Comments noted. Natural England standards/ guidance will be critical in assessing access to natural/ semi-natural green space.
01573/ENL P_FTSA/12 /011	01573	Natural England	Comment	N/A	Support sustainability appraisal objective under Accessibility which aims to enhance access to natural environment and recreational opportunities, advise that there should be no adverse impact on protected nature conservation sites.	Support noted
01573/ENL P_FTSA/12 /012	01573	Natural England	Support	N/A	Welcome sustainability appraisal objectives under heading "Effective Protection of the Environment" and "Prudent Use of Natural Resources".	Support noted
01573/ENL P_FTSA/1/ 001	01573	Natural England	Support	N/A	Satisfied Sustainability Appraisal has been carried out thoroughly using appropriate methodology and incorporates requirements of Strategic Environmental Assessment.	Support noted
01573/ENL P_FTSA/2/ 001	01573	Natural England	Comment	Biodiversity	Agree key sustainability issues generally identified. Recommend that Nene Valley Nature Improvement Area (NIA) is fully considered. Nene Valley NIA is fragmented ecological network of statutory/ non-statutory sites, including Upper Nene Valley Gravel Pits SPA/SSSI.	Agree with comment. Future Sustainability Appraisal documents will contain specific reference to the Nene Valley Nature Improvement Area (NIA).
01573/ENL P_FTSA/3/ 001	01573	Natural England	Support	N/A	Generally supportive of sustainability framework particularly Sustainability Objectives: "Effective Protection of the Environment".	Support noted
01658/ENL P_FTSA/1/ 001	01658	Highways Agency	Support	N/A	Having reviewed document HA is content with scoping report.	Support noted
01658/ENL P_FTSA/1/ 002	01658	Highways Agency	Comment	Local travel patterns	Note reference to Chowns Mill roundabout (pg 15 para 3.30). Currently being discussed as part of potential Tranche 3 Pinch Point Scheme to improve junction by 2015. However, no decision yet whether to proceed.	Comments noted. SA/ SEA scoping report will be updated to reflect latest advice/ information from the Highways Agency.

**APPENDIX 3: Schedule of representations received through consultation for the Habitat Regulations Assessment Stage 1 Screening report**

<b>Comment Ref</b>	<b>Customer Ref</b>	<b>Respondent Name</b>	<b>Representation Type</b>	<b>Paragraph Title</b>	<b>Comment Text</b>	<b>Response Text</b>
01573/ENLP_FTTHR/6/001	01573	Natural England	Support	N/A	Glad to note that Appropriate Assessment/ Habitat Regulations Assessment commissioned.	Support noted
01573/ENLP_FTTHR/13/001	01573	Natural England	Support	N/A	Natural England statutory purpose to ensure natural environment is conserved, enhanced, and managed for benefit of present and future generations, thereby contributing to sustainable development. Welcomes opportunity to provide comments on Habitats Regulations Assessment Update Note, as statutory consultee/ specialist adviser on application of Conservation of Habitats and Species Regulations 2010 ('Habitats Regulations').	Support noted. It is critical that Natural England is an active participant throughout the Four Towns Plan/ HRA process, in accordance with the statutory "Duty to Cooperate" (2011 Localism Act).
01573/ENLP_FTTHR/13/002	01573	Natural England	Support	N/A	Consider update note clearly sets out future work planned as part of Habitat Regulations Assessment (HRA) process. Natural England will be pleased to be involved in future discussions/ consultations as HRA progresses. Happy to comment further should need arise.	Support noted

## Appendix 4 – List of key evidence base documents identified through the Consultation process

Work ongoing/ to be completed – highlighted through Regulation 18 Consultation

Document Name	Author/ Partner	Date
<b>Strategic Housing Market Assessment (SHMA)</b>	Housing Vision	
SHMA update using 2011 Census data		February/ March 2013?
<b>[Not yet finalised]</b>		
SHMA 2012 Update		August 2012
<a href="http://www.nnjpu.org.uk/docs/2012%2008%2007%20NN%20SHMA%20Update%20Summary%20Report.pdf">http://www.nnjpu.org.uk/docs/2012%2008%2007%20NN%20SHMA%20Update%20Summary%20Report.pdf</a>		
<b>North Northamptonshire Strategic Housing Land Availability Assessment (SHLAA)</b>	NNJPU	
SHLAA Update		January/ February 2013
<b>[Not yet finalised]</b>		
SHLAA	Roger Tym & Partners	February 2009
<a href="http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1092">http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1092</a>		
<b>East Northamptonshire Strategic Flood Risk Assessment (SFRA)</b>	URS	
Level 2 SFRA Final Report		November 2012
<b>[Document not yet available online]</b>		
Level 1 SFRA Final Report		August 2011
<a href="http://www.east-northamptonshire.gov.uk/site/scripts/download_info.aspx?downloadID=1087">http://www.east-northamptonshire.gov.uk/site/scripts/download_info.aspx?downloadID=1087</a>		
Community Infrastructure Levy – Preliminary Draft Charging Schedule	ENC/ NNJPU	November 2012 (adoption late 2013?)
<a href="http://www.east-northamptonshire.gov.uk/downloads/PDCS.pdf">http://www.east-northamptonshire.gov.uk/downloads/PDCS.pdf</a>		
Settlement boundaries – the preferred approach – discussion paper	ENC	July 2012
<b>[Document not yet available online]</b>		
<b>Town Centres/ Retail Strategy</b>	ENC	
Ongoing		

Document Name	Author/ Partner	Date
<b>Masterplans</b>		
Higham Ferrers, Irthlingborough (emerging)	Various	
Raunds, Rushden (completed)		
[Full details available through Draft Sustainability Appraisal Scoping Report (Appendix 1)]		
<b>Conservation Area Appraisals</b>		
Higham Ferrers, Irthlingborough, Rushden	Various	
<b>Transport Plans and Strategies</b>	NCC led	
Town Transport Plans and Strategies (e.g. Higham Ferrers)		
<a href="http://www.northamptonshire.gov.uk/en/councilservices/Transport/TP/Pages/NTP-Town-Transport-Strategies.aspx">http://www.northamptonshire.gov.uk/en/councilservices/Transport/TP/Pages/NTP-Town-Transport-Strategies.aspx</a>		
Thematic Transport Strategies		December 2012
<a href="http://www.northamptonshire.gov.uk/en/councilservices/Transport/TP/Pages/NTP-thematic-strategies.aspx">http://www.northamptonshire.gov.uk/en/councilservices/Transport/TP/Pages/NTP-thematic-strategies.aspx</a>		
Northamptonshire Transportation Plan – Fit for Purpose		March 2012
<a href="http://www.northamptonshire.gov.uk/en/councilservices/Transport/TP/Documents/PDF%20Documents/Northamptonshire%20Transportation%20Plan%20-%20Fit%20for%20Purpose.pdf">http://www.northamptonshire.gov.uk/en/councilservices/Transport/TP/Documents/PDF%20Documents/Northamptonshire%20Transportation%20Plan%20-%20Fit%20for%20Purpose.pdf</a>		
<b>Employment land information</b>		
Employment Land Review Update	ENC	June 2013?
<b>[To be completed]</b>		
Northamptonshire Strategic Employment Land Assessment (SELA)	Atkins	November 2012
<a href="http://www.nnjpu.org.uk/docs/Northamptonshire%20SELA%20-%20Final%20Report%20(Excluding%20Appendices).pdf">http://www.nnjpu.org.uk/docs/Northamptonshire%20SELA%20-%20Final%20Report%20(Excluding%20Appendices).pdf</a>		
East Northamptonshire Employment Land Review – Final Report	Atkins	December 2006
<a href="http://www.east-northamptonshire.gov.uk/site/scripts/download_info.aspx?downloadID=275">http://www.east-northamptonshire.gov.uk/site/scripts/download_info.aspx?downloadID=275</a>		
<b>Viability Assessments</b>		
Independent viability assessment of potential development sites, against infrastructure requirements		
<b>[Needed as part of site appraisal process]</b>		

Document Name	Author/ Partner	Date
<b>Emerging Neighbourhood Plans/ Community (Parish) Plans</b>		
Higham Ferrers Neighbourhood Plan	Higham Ferrers Town Council	
Raunds Town Centre Neighbourhood Plan	Raunds Town Council	
Stanwick Parish Plan – Review/ update	Stanwick Parish Council	2013?
<a href="http://www.stanwickpc.moonfruit.com/#/parish-plan/4553770812">http://www.stanwickpc.moonfruit.com/#/parish-plan/4553770812</a>		
Stanwick Village Plan	Stanwick Parish Council	2007
<a href="http://www.stanwickpc.moonfruit.com/cgi-bin/download.cgi">http://www.stanwickpc.moonfruit.com/cgi-bin/download.cgi</a>		

### Other documents/ studies highlighted through Regulation 18 Consultation

Document Name	Author/ Partner	Date
Northamptonshire Habitat Opportunity Map	Northamptonshire Biodiversity Partnership	
<a href="http://www.northamptonshirebiodiversity.org/habitat-opportunity-map.htm">http://www.northamptonshirebiodiversity.org/habitat-opportunity-map.htm</a>		
Historic Land Character Assessment (Northamptonshire)	NCC/ LDA	
<a href="http://www.northamptonshireobservatory.org.uk/docs/dochistoricalandscapecharaterassessment2070705160342.pdf">http://www.northamptonshireobservatory.org.uk/docs/dochistoricalandscapecharaterassessment2070705160342.pdf</a>		
Draft Urban Structures Study	NNJPU	September 2012
<a href="http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1273">http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1273</a>		
Heritage in local plans: how to create a sound plan under the NPPF	English Heritage	July 2012
<a href="http://www.english-heritage.org.uk/content/publications/publicationsNew/guidelines-standards/heritage-local-plans/heritage-local-plans-nppf.pdf">http://www.english-heritage.org.uk/content/publications/publicationsNew/guidelines-standards/heritage-local-plans/heritage-local-plans-nppf.pdf</a>		

Document Name	Author/ Partner	Date
<b>North Northamptonshire Retail Capacity Update</b>		
2012 Update	Roger Tym & Partners	May 2012
<a href="http://www.nnjpu.org.uk/docs/NNRCS%202012%20Update%20Final.pdf">http://www.nnjpu.org.uk/docs/NNRCS%202012%20Update%20Final.pdf</a>		
2010 Update	Roger Tym & Partners	February 2011
<a href="http://www.nnjpu.org.uk/docs/FINAL%20REPORT%20-%20ISSUED%2011%2002%2011.pdf">http://www.nnjpu.org.uk/docs/FINAL%20REPORT%20-%20ISSUED%2011%2002%2011.pdf</a>		
Open Space Supplementary Planning Document	ENC	November 2011
<a href="http://www.east-northamptonshire.gov.uk/downloads/Open_Space_SPD_FINAL.pdf">http://www.east-northamptonshire.gov.uk/downloads/Open_Space_SPD_FINAL.pdf</a>		
North Northamptonshire Flood Risk Management Strategy Update	URS	March 2012
<a href="http://www.nnjpu.org.uk/docs/FINAL%20-%20NNFRMS%20Update%20Final%20Report.pdf">http://www.nnjpu.org.uk/docs/FINAL%20-%20NNFRMS%20Update%20Final%20Report.pdf</a>		
<b>Gypsy and Traveller Accommodation Assessments</b>		
North Northamptonshire Gypsy and Traveller Accommodation Assessment Update 2011	NNJPU	October 2011
<a href="http://www.nnjpu.org.uk/docs/Northamptonshire%202011%20GTAA%20UpdateFinal%20Report%202012-2022%20October%202011.pdf">http://www.nnjpu.org.uk/docs/Northamptonshire%202011%20GTAA%20UpdateFinal%20Report%202012-2022%20October%202011.pdf</a>		
<b>Rushden Town Centre Regeneration Strategy</b>	Prince's Foundation	June 2010
Update/ review needed, as strategy was dependent upon Manor Park Leisure Centre implementation		
<a href="http://www.east-northamptonshire.gov.uk/downloads/Regeneration_Strategy_-_Rushden_Town_Centre_2.pdf">http://www.east-northamptonshire.gov.uk/downloads/Regeneration_Strategy_-_Rushden_Town_Centre_2.pdf</a>		
Bedfordshire and Luton Strategic Housing Market Assessment (SHMA)	Opinion Research Services/ Savills	March 2010
<a href="http://www.luton.gov.uk/Housing/Lists/LutonDocuments/PDF/Housing/Housing%20development%20and%20strategy/Strategic%20Housing%20Market%20Assessment%20Executive%20Summary%20A4.pdf">http://www.luton.gov.uk/Housing/Lists/LutonDocuments/PDF/Housing/Housing%20development%20and%20strategy/Strategic%20Housing%20Market%20Assessment%20Executive%20Summary%20A4.pdf</a>		

<b>Document Name</b>	<b>Author/ Partner</b>	<b>Date</b>
'Nature Nearby' – Accessible Natural Greenspace Guidance <a href="http://publications.naturalengland.org.uk/publication/40004">http://publications.naturalengland.org.uk/publication/40004</a>	Natural England	March 2010
<b>Network Rail</b>		
Emerging Long Term Planning Process (LTTP) market studies <a href="http://www.networkrail.co.uk/improvements/planning-policies-and-plans/long-term-planning-process/market-studies">http://www.networkrail.co.uk/improvements/planning-policies-and-plans/long-term-planning-process/market-studies</a>	Network Rail	2013
East Midlands Route Utilisation Strategy <a href="http://www.networkrail.co.uk/browse%20documents/rus%20documents/route%20utilisation%20strategies/east%20midlands/east%20midlands%20rus.pdf">http://www.networkrail.co.uk/browse%20documents/rus%20documents/route%20utilisation%20strategies/east%20midlands/east%20midlands%20rus.pdf</a>	Network Rail	February 2010
<b>Urban Extensions Studies</b>		
Rushden, Higham Ferrers and Irthlingborough <a href="http://www.east-northamptonshire.gov.uk/downloads/Urban_Extensions_Study_Report_-_Rushden_Higham_Ferrers_and_Irthlingborough.pdf">http://www.east-northamptonshire.gov.uk/downloads/Urban_Extensions_Study_Report_-_Rushden_Higham_Ferrers_and_Irthlingborough.pdf</a>	ENC	August 2006
Raunds <a href="http://www.east-northamptonshire.gov.uk/downloads/Urban_Extensions_Study_Report_-_Raunds.pdf">http://www.east-northamptonshire.gov.uk/downloads/Urban_Extensions_Study_Report_-_Raunds.pdf</a>	ENC	December 2006
<b>Documents in support of recent major applications</b>		
Rushden Lakes <a href="http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=12/00010/FUL">http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=12/00010/FUL</a>	12/00010/FUL	
West End, Brick Kiln Road, Raunds <a href="http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=11/01747/OUT">http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=11/01747/OUT</a>	11/01747/OUT	
Rushden Hospital, Wymington Road <a href="http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=10/01017/OUT">http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=10/01017/OUT</a>	10/01017/OUT	
Northdale End, Raunds <a href="http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=09/01626/OUT">http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=09/01626/OUT</a>	09/01626/OUT	
Darsdale Farm, Chelveston Road, Raunds <a href="http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=07/02238/OUT">http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=07/02238/OUT</a>	07/02238/OUT	