



## Planning Policy Committee 3<sup>rd</sup> April 2017

### District-wide Local Plan Part 2 Feedback from Regulation 18 Consultation

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#### Purpose of report

To explain the first stage (Regulation 18) of the District-wide Local Plan Part 2; and to summarise feedback received during the consultation (27 January – 13 March 2017, inclusive).

#### Attachment(s)

Appendix 1: Summary responses: Regulation 18, Sustainability Appraisal Scoping and Habitat Regulations Assessment Screening consultation, 27 January – 13 March 2017

Appendix 2: Regulation 18 consultation – schedule of responses by question

Appendix 3: Sustainability Appraisal Scoping and Habitat Regulations Assessment Screening – schedule of responses

Appendix 4: Call for sites – schedule of site specific submissions

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#### 1.0 Background

- 1.1 This report explains the recent District-wide Local Plan Regulation 18, Call for Sites, Sustainability Appraisal (SA) and (HRA) consultation. It sets out how the consultation was undertaken; through a combination of statutory notification, publicity and workshops. It summarises the key issues that have been raised, by way of the workshop events and written representations. It also briefly explains the next stages in the plan-making process.
- 1.2 On 11 April 2016, the Council decided to commence with the preparation of a District-wide Local Plan Part 2. This will set out site-specific policies and proposals for the current Local Plan period (2011-2031). It will provide additional District-level detail, supporting the strategic planning policies in the North Northamptonshire Joint Core Strategy (JCS) 2011-2031 (the Local Plan Part 1), adopted July 2016.
- 1.3 The first formal stage in preparing the Local Plan Part 2 is a statutory six-week consultation, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. The Regulation 18 consultation took place over six weeks (27 January – 13 March 2017, inclusive). This report summarises the feedback received during that consultation.
- 1.4 The Regulation 18 consultation consisted of four aspects:
  - Consultation with key consultees and stakeholders, in order to assess the scope (range of themes and topics to be covered) for the Local Plan Part 2;
  - Call for sites – Providing an opportunity for landowners, developers and other third parties to update the Council's information regarding potential development sites that they are seeking to put forward as site-specific allocations;
  - Sustainability Appraisal (SA) Scoping – Initial consultation, under the Environmental Assessment of Plans and Programmes Regulations 2004 ("the 2004 Strategic Environmental Assessment Regulations"); and
  - Habitat Regulations Screening – Initial consultation, under the Conservation of Habitats and Species Regulations 2010, as amended, as part of the ongoing Habitats Regulation Assessment (HRA).

1.5 Each of the four elements of the Regulation 18 consultation was supported by a consultation document (<http://www.east-northamptonshire.gov.uk/reg18>):

- The Regulation 18 consultation document sets out 34 questions regarding potential issues that the Local Plan Part 2 may need to address;
- The Call for Sites document provides an index for potential Local Plan allocations that have been put forward over the previous 5-6 years;
- The SA Scoping Report sets out background baseline information, identifying key sustainability issues and problems; and
- The HRA Screening Opinion is required to ensure that the Local Plan Part 2 does not have a significant adverse impact upon the Upper Nene Valley Special Protection Area (SPA) / Ramsar site.

## **2.0 Regulation 18 consultation workshops**

2.1 The consultation has been supported by three workshop events. The Council wrote to key stakeholders (internal and external consultees), inviting them to attend a workshop or meeting as part of the Regulation 18 consultation. In response, three workshop events were arranged:

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

### **2.2 PSTB workshop (20<sup>th</sup> January 2017)**

Officers were invited to submit comments so as to gather headline information about key service area work that could be addressed / covered by the Local Plan Part 2.

2.3 The workshop enabled officers to identify issues or specific projects that the Local Plan Part 2 should consider; assessing issues or specific projects, and associated risks and benefits. Comments were sought regarding:

- Project timescales (short 2016-21; medium 2021-26; or long term 2026-31);
- Overall issues or matters;
- Spatial or specific projects.

2.4 A broad range of issues was raised and suggestions put forward for the Local Plan Part 2. Matters and themes arising included:

- Design and regeneration; e.g. town centres, public realm improvements or innovative design;
- Public transport investment and improved accessibility for cyclists;
- Services for vulnerable groups; e.g. elderly;
- Improvements in provision for leisure, recreation and sport;
- Natural environmental enhancement; e.g. ecosystem services;
- Attracting investment for high quality skills and jobs – tourism, improved further education, etc;
- Affordable housing needs/ provision – maintaining housing delivery to meet ongoing needs.

2.5 The PSTB workshop also considered benefits and risks associated with the issues or specific projects that were put forward during the workshop. This will support the plan-making process from here on.

## **2.7 Statutory consultees workshop (21<sup>st</sup> February 2017)**

Statutory environmental consultees (the Environment Agency, Historic England and Natural England) were invited to attend the second workshop event. It was run in a similar way to the internal PSTB workshop. Representatives from the Environment Agency and Natural England attended (unfortunately representatives from Historic England were unable to make the date).

2.8 A broad range of issues was raised in response to the Regulation 18 consultation questions, with suggestions put forward for the Local Plan Part 2. Matters raised during the workshop included:

- Current progress with sustainable urban extensions – Rushden East, Irthlingborough West;
- Strategic Flood Risk Assessment – updates needed;
- Housing numbers – implications for SPA Mitigation Strategy;
- Implications of Water Framework Directive requirements; e.g. re climate change;
- Sub-district policies; e.g. Rockingham Forest;
- Green Infrastructure / ecosystem services – potential policies/ proposals;
- Renewable energy – consider provision for hydro-electric power;
- Community infrastructure / health – grading facilities and open spaces by quality.

## **2.9 ENC councillors workshop (2<sup>nd</sup> March 2017)**

All ENC councillors were invited to attend a Regulation 18 workshop. 18 Councillors attended the event. Councillors were invited to comment in response to a selection of the 34 Regulation 18 consultation questions (Q2, Q3, Q4, Q5, Q7, Q13, Q14, Q15, Q19, Q22 and Q23).

2.10 A broad range of issues was raised, with suggestions put forward for the Local Plan Part 2. Matters raised through the workshop include:

- Overall Local Plan strategy (Q2-Q5) – Implications of Neighbourhood Plans; functional connections between villages and urban areas (towns/ service centres); addressing concerns re out-commuting; potential approaches to defining settlement boundaries, e.g. to allow for an appropriate quantum of development in all settlements;
- Landscape / natural environment (Q13-Q14) – Consideration of potential further areas of tranquillity; opportunities for developing hydroelectric power and tourism along the Nene Valley / main tributaries;
- Housing mix (Q15) – Demand / need for specialist housing (e.g. bungalows); housing design; mechanisms for delivering housing to meet identified needs;
- Economic development (Q19, Q22 and Q23) – Approaches to managing town centre uses; focus on existing employment base; future needs of businesses, e.g. super-fast Broadband.

2.11 Outputs from the three workshops will be noted and collated. Alongside written Regulation 18 submissions from the main consultation process, the workshop discussions will contribute to the plan-writing process.

## **3.0 Regulation 18 consultation**

3.1 The Regulation 18 consultation was preceded by a press article and statutory notice in the Nene Valley News on 28 January 2017 (<http://nenevalleynews.co.uk/e-version/>). These explained the role of the District-wide Local Plan Part 2 and the Regulation 18 consultation itself; the latter forming the first formal stage in the plan-making process. 45 representations were received in response to the Regulation 18 consultation.

3.2 Representations were received from the following range of consultees and individuals:

- Local authorities – Bedford Borough Council, Corby Borough Council and East Northamptonshire Council (Housing Strategy);
- Northamptonshire County Council, in its position as Lead Local Flood Authority (LLFA); archaeology health / wellbeing and natural environmental advisor; and interested landowner;
- Nine Town and Parish Councils / Parish Meetings;
- Statutory environmental consultation bodies – Environment Agency, Historic England, Natural England;
- Other statutory consultees / infrastructure providers – Anglian Water, CLH Pipeline Systems Ltd;
- Non-statutory consultees, including National Trust;
- Developers / landowners, including Gladman Developments Ltd, Persimmon Homes, Catesby Estates, LXB 3.

3.3 Respondents submitted a total of 489 comments. The key points raised by the representations are summarised at **Appendix 1**. These relate to the following matters:

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

3.4 Full verbatim Regulation 18 responses are set out at **Appendix 2**. These have been ordered by question.

#### **4.0 Sustainability Appraisal Scoping and Habitat Regulations Assessment Screening**

4.1 Five respondents (North Northants Badger Group, Gladman Developments Ltd, Historic England, Environment Agency and Natural England) submitted a total of 30 comments in response to the Sustainability Appraisal (SA) Scoping Report.

4.2 The respondents commented on various aspects of the Sustainability Assessment (SA), the main focus being towards the rural nature of the district and that relevant factors arise because of this. Issues raised include informal activities in the countryside, wildlife crime, natural solutions to climate change, recognition of the agricultural industry and diversification with this economic sector.

4.3 Other comments relate to the main landscape characteristics of the district – the woodland areas that need connections to create corridors, habitat fragmentation should be reduced. Further work on the heritage aspects and understanding implications will need to be done.

4.4 These issues will be taken on board and the scoping report updated to take account of these responses. Responses will be reviewed with the consultees and updated in due course. Consultants have been secured to undertake the SA and HRA of the LPP2.

4.5 Natural England submitted a further four comments regarding the Habitat Regulations Assessment (HRA) Screening opinion.

- 4.6 Full verbatim responses regarding the SA Scoping Report and HRA Screening report are set out at **Appendix 3**.

## **5.0 Call for sites**

- 5.1 The “call for sites” forms an integral part of the plan-making process. This has therefore been undertaken at an early stage and incorporated into the Regulation 18 consultation.

- 5.2 107 site-specific submissions were received during the Regulation 18 consultation period (27 January – 13 March 2017 inclusive). In addition, 35 council-owned sites have also been included. The numbers of responses received are as follows:

- 107 online site submissions;
- 35 council owned sites (which will all be appraised for potential suitability along with the other sites put forward);
- Of these, 15 responses duplicate sites that were already specified in the Call for Sites document.

- 5.3 In nearly all cases, these were submitted through the online site submission form (<http://www.east-northamptonshire.gov.uk/callforsites>). Several promoters submitted more detailed responses to accompany these online submissions.

- 5.4 Site submissions ranged from small scale potential infill plots (<0.2ha) to major potential development land allocations (>5ha gross site area). Large scale development land proposals put forward during the Regulation 18 consultation include:

- Land south of Glapthorn Road, between Glapthorn and Oundle (G E Reading and Sons) – housing;
- Land at Slaters Lodge / Buscotts Lodge, Newton Road, Higham Ferrers – housing (potential longer term Rushden East development phases);
- Middle End, Raunds (Barwood Land) – mixed use (housing/ employment);
- New potential development sites adjacent to Sheldon Road, south east of Raunds – housing;
- Land west of Rushden Lakes, Ditchford Lane, Rushden (LXB 3) – mixed use (employment, housing, retail and leisure);
- Land north east of Thrapston (Peterborough Diocese Board of Finance) - employment;
- Springfield Farm, Oundle Road, Thrapston (Society of Merchant Venturers) – housing.

- 5.5 In addition to these large scale sites, significant numbers of site submissions have been put forward at a number of villages, including Glapthorn, King’s Cliffe, Ringstead, Stanwick, Polebrook, Warmington and Yarwell. These site submissions included further potential housing sites around Glapthorn (to the north of Oundle), some of which were also recently put forward through Glapthorn Parish Council’s recent Neighbourhood Plan “call for sites”. A further significant housing site proposal (5.8ha) was proposed by Gladman Developments Ltd, at land west of Denford Road, Ringstead.

## **6.0 Overview: the next stages**

- 6.1 Officers have collated the representations and site submissions received during the Regulation 18 consultation (27 January – 13 March 2017, inclusive). The key findings are summarised above, and are included at **Appendix 1**.

- 6.2 The Regulation 18, SA Scoping and HRA Screening consultation responses will

inform the next stages in the plan preparation process. Responses to Q33 (Evidence base) and Q34 (Policy outcomes) have identified priority areas of work, to ensure the evidence base for the Local Plan Part 2 is sound, fit for purpose and as up to date as it can be. The consultation has highlighted the following elements of the evidence base that will need to be prepared, reviewed, or updated in order to ensure that the Plan is “sound”:

- Update Strategic Housing Market Assessment;
- Site assessments, to support site selection process;
- Employment Land Review update;
- Strategic Flood Risk Assessment update;
- Green Infrastructure Analysis.

6.3 The Council will continue to engage with relevant stakeholders in reviewing and updating the evidence base. This is a critical part of the plan-making process, and is required in order to comply with the statutory Duty to Cooperate.

6.4 Officers will also follow a similar process of continuous engagement with councillors, as the Local Plan Part 2 is taken forward. A programme of further topic based workshops will be held as a key element of continuing ENC councillor engagement in the Local Plan Part 2 process. It is intended that these will be organised for May and June 2017, and the outcomes from them will be reported to the next Planning Policy Committee (24 July 2017).

## **7.0 Equality and Diversity Implications**

7.1 There are no equality and diversity implications arising from the proposals at this stage. The Local Plan Part 2 will be supported by an Equalities Impact Assessment, which will identify any potential equality or diversity implications as the plan takes shape.

## **8.0 Legal Implications**

8.1 There are no legal implications arising from the proposals at this stage. The consultation has been undertaken in accordance with the relevant legislation (Town and Country Planning (Local Planning) (England) Regulations 2012, as amended; Environmental Assessment of Plans and Programmes Regulations 2004, and Conservation of Habitats and Species Regulations 2010, as amended).

## **9.0 Risk Management**

9.1 The Local Plan Part 2 will form part of the statutory development planning framework that the Council is required to prepare. The Regulation 18 consultation is the first formal / statutory stage in the process. As such, it is critical to ensure that the consultation has been undertaken in accordance with the relevant legislation and the requirements of the Statement of Community Involvement (SCI), adopted December 2013.

9.2 Failure to meet the statutory requirements or SCI could lead to delays further along the plan-making process. In a worst case scenario, the Local Plan Part 2 could fail (be found “unsound”) at independent examination.

## **10.0 Resource and Financial Implications**

10.1 There are no direct resource and financial implications arising from this report. However, funding may be required to resource some aspects of the evidence base, in the event that external consultants are needed (e.g. Strategic Flood Risk Assessment). If additional funding is required, further reports will be brought to the relevant committees.

## 11.0 Constitutional Implications

11.1 There are no constitutional implications arising from this report.

## 12.0 Customer Service Implications

12.1 There are no customer service implications arising from this report.

## 13.0 Corporate Outcomes

13.1 The relevant Corporate Outcomes are:

- Good Quality of Life – sustainable development, strong communities, high quality built environment, improved housing and public health;
- Effective Partnership Working – effective joint working with neighbouring local planning authorities in accordance with the statutory “Duty to cooperate”; and with Town / Parish Councils and Neighbourhood Planning groups to ensure that the Local Plan Part 2 and Neighbourhood Plans complement one another;
- Effective Management – ensuring a continuous and sufficient deliverable housing land supply to meet local (district-level) housing needs
- Knowledge of our customers and communities – ensuring that the diverse spatial character of the District is recognised.

## 14.0 Recommendation

14.1 The Committee is recommended to:

- (1) Acknowledge the summary Regulation 18 consultation feedback report (Appendix 1) and full Regulation 18 responses (Appendix 2).
- (2) Acknowledge the summary Sustainability Appraisal (SA) Scoping Report and Habitat Regulations Assessment (HRA) Screening Report feedback (Appendix 1) and full SA/ HRA responses (Appendix 3).
- (3) Acknowledge the site submissions received through the “Call for sites” consultation (Appendix 4).

*(Reason – To ensure that the requirements of the relevant legislation have been met and enable preparation of the Local Plan Part 2 to progress)*

Legal	Power: <b>Planning and Compulsory Purchase Act 2004</b> <b>Localism Act 2011</b> <b>Town and Country Planning (Local Planning) (England) Regulations 2012, as amended</b> <b>Environmental Assessment of Plans and Programmes Regulations 2004</b> <b>Conservation of Habitats and Species Regulations 2010, as amended</b>				
	Other considerations: N/a				
<b>Background Papers:</b> North Northamptonshire Joint Core Strategy 2011-2031 (adopted 14 July 2016) – Local Plan Part 1 Consultation documents: Regulation 18 consultation paper; Call for sites paper; Sustainability Appraisal Scoping Report; Habitat Regulations Screening Opinion ( <a href="http://www.east-northamptonshire.gov.uk/reg18">http://www.east-northamptonshire.gov.uk/reg18</a> ) Planning Policy Committee, 20 February 2017 (Agenda Item 5) Full Council, 11 April 2016 (Agenda Item 11)					
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<b>Date: 27 March 2017</b>					
<b>CFO</b>		<b>MO</b>		<b>CX</b>	



### **Summary responses: Regulation 18, Sustainability Appraisal Scoping and Habitat Regulations Assessment Screening consultation, 27 January – 13 March 2017**

#### **Regulation 18 consultation responses**

##### **Consultation process**

A few representations were received regarding the consultation process, as a whole. These responses included “holding representations” from the North Northamptonshire Joint Planning Unit, Little Addington Parish Council and Ringstead Parish Council. In these cases, respondents indicated that detailed representations would be submitted as soon as the relevant meeting or committee had an opportunity to discuss these and formally respond.

It is anticipated that the outstanding responses will be received over the coming weeks. While these may be too late to be included as part of this report, the late/ follow-up responses will nevertheless help to inform the Local Plan Part 2 as it progresses.

##### **Overall strategy (Q1-Q5)**

###### ***Q1 Framework/ structure***

Views varied regarding the structure of the Local Plan Part 2 (Regulation 18 document, Appendix 2). Some consultees (e.g. Higham Ferrers Town Council, National Trust and Gladman Developments Ltd) considered that the Four Towns Plan structure could be adapted for the new Local Plan Part 2. Other consultees (e.g. Stanwick Parish Council, Investment Land International and Catesby Estates) took the opposite view; that it would be preferable for the Local Plan Part 2 structure to be closely related to the JCS (Local Plan Part 1 structure).

###### ***Q2 Vision and Outcomes***

Several respondents considered whether it is necessary for the Local Plan Part 2 to expand upon the overall spatial strategy (urban/ rural differentiation) already set out in the JCS (Policy 11/ Table 1). Some respondents (Catesby Estates, Higham Ferrers Town Council, National Trust and Stanwick Parish Council) emphasise the urban/ rural distinction defined by the JCS. Others (e.g. Investment Land International) reiterate that the Plan must remain consistent with the JCS.

On behalf of developers/ landowners, several respondents (e.g. Gladman, John Martin Associates) emphasise the importance of sustaining rural communities. Applying a similar argument, Burghley House/ Hollins and LXB3 emphasise the accessibility of certain rural villages (e.g. Easton on the Hill) to nearby Growth or Market Towns. Davidsons highlights the need to consider the character of each settlement, to develop a coherent spatial strategy.



### ***Q3 Presumption in favour of sustainable development***

Considering whether further direction regarding the presumption in favour of sustainable development, several respondents (Persimmon, Gladman, National Trust, Burghley House/ Hollins, Catesby Estates, Society of Merchant Venturers and Davidsons) all argue that JCS Policy 1 adequately defines the presumption in favour of sustainable development for the Local Plan, and a further policy in the Local Plan Part 2 could lead to duplication and confusion.

Other respondents (Blatherwycke Estate, John Martin Associates, Woodford Parish Council and Natural England) highlight specific aspects of sustainable development; e.g. minimising the need to travel and climate change. The Blatherwycke Estate has suggested that the Local Plan Part 2 should recognise the varied characteristics of different types of settlement throughout the District, while Natural England states that the presumption in favour of sustainable development must recognise local distinctiveness, emphasising: "Climate change in the local context".

### ***Q4 Settlement hierarchy***

In arguing for a more detailed District-level spatial development strategy, several respondents (Higham Ferrers Town Council, Persimmon, Investment Land International, Gladman and John Martin Associates) have emphasised that the Local Plan Part 2 should contain a more detailed settlement hierarchy for the rural area, in recognition of the vast distinction between individual villages based on population and character. Other respondents (Woodford Parish Council, Burghley House/ Hollins, Francis Jackson Homes, Davidsons, Catesby Estates) argue that rural growth requirements should be based on villages' capacity, services and relationship with higher order centres. Stanwick Parish Council has stated that there is no need for the Local Plan Part 2 to expand upon the JCS spatial strategy.

### ***Q5 Settlement boundaries***

Opinions regarding the approach to settlement boundaries are varied. Respondents' views vary greatly as to the appropriateness and effectiveness of settlement boundaries as a development management tool. Some representations argue that the move to a written definition would be the most appropriate/ flexible strategy, while others consider that settlement boundaries provide certainty in clearly defining the differentiation between built up areas and the countryside. Opinions also vary as to whether it would be appropriate to "delegate" settlement boundary definition to Neighbourhood Plans. A common theme arising from the representations is the need for a consistent approach.

<b>Preferred approaches for defining settlement boundaries (Q5)</b>			
<b>Option a – criteria based policy</b>	<b>Option b – comprehensive approach: Local Plan Part 2</b>	<b>Option c – Separate urban/ rural area approaches: Local Plan Part 2</b>	<b>Other approaches</b>
Stanwick Parish Council	Investment Land International	Higham Ferrers Town Council	Gladman – previous RNOTP boundaries now out of date
Persimmon Homes	National Trust		Francis Jackson Homes, Charles Lane – need consistency; not appropriate to leave entirely to Neighbourhood Plans as these are based on administrative boundaries
Burghley House/ Hollins	Catesby Estates		Gladman, John Martin Associates, Blatherwycke, Charles Lane, Burghley House/ Hollins – boundaries need to allow for sustainable growth
	Davidsons		
	LXB 3		

## **Historic and built environment (Q6-Q8)**

### ***Q6 Historic Environment***

Town and Parish Councils respond, saying that the LPP2 should designate local assets and that Neighbourhood Plans can supplement this as required.

NCC (Archaeology) considers that a comprehensive assessment of all assets that could be included on a local list would be very onerous and time consuming. It would be better to focus on areas that may experience new development, areas of multiple designated assets or include them in a Neighbourhood Plan, unless resources are available for a comprehensive assessment. The NPPF and JCS do provide protection for managing and enhancing the historic environment.

Developers respond saying that the JCS and NPPF adequately cover the hierarchy of heritage assets. But if they are included then they need to be based on a robust criteria to provide the evidence that can be used by applicants. Another landowner says that there will need to be some flexibility with regard to future uses of assets.

National Trust and Historic England suggest that criteria may be most appropriate to allow lists to be updated accordingly. Historic England has produced guidance that may be helpful.

### ***Q7 Town Centre Regeneration***

Higham Ferrers Town Council considers that there should be areas within the town that could be regenerated and build on the Neighbourhood Plan; specifically the Bury Close industrial estate.

Historic England supports the inclusion of the sites in Thrapston (the library and Cattle Market) that can help to preserve and improve the appearance in the Conservation Area.

#### ***Q8 Re-using rural buildings and redevelopment in the open countryside***

Historic England considers that the criteria included in previous policies on this matter are sufficient, but should reflect terminology in the NPPF. Developer interests respond saying that no additional criteria are required that could restrict the re-use of rural buildings.

### **Open space and green infrastructure (Q9-Q14)**

#### ***Q9 Play pitch, sport and recreation***

The consensus, both parish and town council and developers, is that sites should be designated in line with that identified in the evidence base, but additionally criteria should be detailed to assess new additional areas or to act as a guide for Neighbourhood Plans. Natural England would want to see a development management policy to protect sites and these be shown on a policies map.

Developers respond, suggesting that new sites need to address a quantitative need to allow efficient use of land or poor sites improved.

#### ***Q10 Local green space***

Local Green Space is a protective designation that can be given to space that is of particular importance to the local community. A mixed approach is favoured by many respondents with sites being designated in the LPP2 where evidence is robust, however a criteria included guiding Neighbourhood Plans to designate further areas. Some respondents consider that designations should only be made in Neighbourhood Plans with criteria provided in the LPP2.

#### ***Q11 Green Infrastructure***

The town and parish councils and other public organisations overwhelmingly suggest that a review of existing GI and consideration given to other opportunities is required and incorporated into a refresh of the Green Infrastructure Delivery Plan. The County Council and Natural England suggest that there is a need to consider all opportunities and undertake further detailed review on current provision and demand of multifunctional GI that provides an enhanced and connected resource, and helps mitigate impacts on designated sites. Further evidence has been established that considers existing assets and where new provision can complement existing GI and locations for investment. Alongside this, consideration of historic assets needs to be incorporated into the Plan.

Developer respondents suggests that there is already sufficient guidance in the JCS and that NP or development sites can then use the evidence to define further corridors. A different developer provides suggestions on how their site can provide additional linkages.

#### ***Q12 Ecosystem Services***

Two respondents consider that there is enough guidance in the JCS and NPPF for trees in relation to biodiversity and geodiversity. NCC suggest using the collated evidence base on Ecosystem Services to influence the planning process and identify

areas of supply and demand to then set out priority areas for multiple services within the District.

The Environment Agency has suggested that when considering river restoration that GI, Ecosystem Services, landscape and open space all provide opportunities to ensure no deterioration in water quality.

Developers consider that option 'a' is appropriate in that the JCS sets out policies for protecting the natural environment.

Natural England advises a combination of the suggested approaches – tree focus and linkages in the Rockingham Forest; the LPP2 could identify gaps and have a local policy on specific locations for green corridors, hedgerow and woodland planting; specific priority habitats can be identified and highlighted on they can be enhanced.

### ***Q13 Landscape Designations***

The developers that have responded to this question have stated that the NPPF and JCS are sufficient for this policy area. Another developer has said that further designations are not required if appropriate settlement boundaries are in place and future land safeguarded. Concern is raised by landowner interest that a blanket approach should not be taken, and each need to be considered based on evidence and then consulted on.

However the town and parish councils consider that areas need to be designated to prevent coalescence and NCC consider that some of the historic features are relevant to a landscape scale, specifically areas of Ridge and Furrow.

Two areas have been highlighted for special policy consideration, Lyveden New Bield (National Trust) and the village of Ashton and Ashton Wold (Historic England) to protect their setting and heritage assets.

Natural England say reference should be made to the National Character Areas relevant to the area.

### ***Q14 Renewable energy***

Melchbourne & Yelden Parish Council and Historic England submitted comments regarding renewable energy developments. The Parish Council provided a factual update; that the Chelveston Renewable Energy Park is partly situated in Bedford Borough, while Historic England argued that development management criteria should take into account historic assets.

### **Housing (Q15-Q17)**

On behalf of developers and landowners, several respondents sought to challenge the residual housing requirements, set out at paragraphs 10.2-10.4 of the Regulation 18 document. John Martin Associates and Burghley House/ Hollins argue against the use of a rural windfall allowance. Other developers/ landowners (e.g. Charles Lane, Society of Merchant Venturers) argue that Market Towns are suitable to accommodate further growth.

### ***Q15 Housing mix and tenure***

Several respondents (Persimmon Homes, Investment Land International and Gladman and Burghley House/ Hollins) all argue that JCS Policy 30 provides sufficient detail regarding housing size, mix and tenure. Other respondents (ENC Housing Strategy team and Davidsons) emphasise the variations in local needs and requirements, recognising the different character and requirements between the north and south of the District. The Housing Strategy team has also highlighted the need to ensure delivery of housing in accordance with local standards; e.g. Category 2 National Accessibility Standards.

### ***Q16-17 Specialist housing provision***

Many respondents emphasise a need for the Local Plan Part 2 to make provision for specialist (e.g. older persons', gypsy/ traveller) accommodation to meet unmet demand. Some respondents (ENC Housing Strategy, Investment Land International, John Martin Associates) have considered the most effective ways to deliver specialist housing; e.g. through bespoke smaller developments or as part of larger site allocations (Rushden East/ Deenethorpe). Other representations (ENC Housing Strategy, Gladman, LXB 3) have considered the implications of the Housing White Paper; e.g. to support delivery of custom/ self-build housing.

### **Town centres and retailing (Q18-Q21)**

#### ***Q18-Q20 Town centres and retail – managing development***

A number of respondents have considered the approaches that the Local Plan Part 2 should take in respect of managing development of main town centre uses within and beyond the town centres. It was proposed that the Local Plan Part 2 should undertake further town centre boundary assessments, as required by NPPF paragraph 23, where no Neighbourhood Plan is in preparation or made (Higham Ferrers Town Council, LXB3). Other representations have considered the relative merits of a “saturation policy” (to avoid the over-concentration of single uses) or impact test thresholds. Higham Ferrers Town Council supports these approaches, while others (e.g. KFC, LXB 3) emphasise that these could be restrictive in allowing for development within town centres.

#### ***Q21 Local centres***

Stanwick Parish Council does not support the designation of Local centres at Stanwick and Ringstead. By contrast, other respondents (Investment Land International, Gladman) support this approach, as a means to enhance the vitality and viability of these localities.

### **Employment areas (Q22-Q23)**

#### ***Q22 Existing employment areas***

The relative quality of established employment areas has been considered by a number of respondents. Some areas (e.g. Bury Close, Higham Ferrers) are highlighted as being in need of enhancement (Higham Ferrers Town Council), while the need for an up to date review of existing employment areas is highlighted (Burghley House/ Hollins, Persimmon). Other respondents have emphasised that NPPF paragraph 22 requires that existing employment land allocations should be regularly reviewed, and that it is inappropriate for all existing employment areas to be protected (Persimmon Homes, Burghley House/ Hollins, Catesby Estates).

### ***Q23 Further employment land allocations***

The need to make provision for further employment land allocations has been considered by some respondents. Burghley House/ Hollins has highlighted the need for the Local Plan Part 2 to consider smaller (non-strategic) employment land allocations. Other respondents (Higham Ferrers Town Council, Catesby Estates) have stated that the Plan needs to review existing allocations and ensure that a deliverable supply of strategic employment sites can be maintained.

## **Culture and community facilities (Q24-Q26)**

### ***Q24 Tourism and culture***

There are a mixture of views from the parish and town councils; one considers that additional policy is required for tourism development and accommodation, conversely another thinks that nothing further is required in the LPP2. Other consultees support tourism development and the role that the waterways can have alongside the infrastructure required to support this.

A developer suggests that use of existing buildings in rural areas for permanent dwellings reduces the opportunity for tourist accommodation. The supply of tourist accommodation is limited and impacts on the rural economy. Tourist accommodation needs protection and windfall for residential rural development limited. A policy on tourism related development will need to be flexible and accommodation proposals considered on their merits. Another developer considers it appropriate to allocate sites for tourism uses.

### ***Q25 Community Infrastructure***

All respondents agree that LPP2 should designate where the evidence base suggests and provide protection for facilities. One respondent also suggests that Neighbourhood Plans can address any local deficiencies. A developer respondent considers that the JCS provides sufficient protection of community facilities.

### ***Q26 Health and wellbeing***

Town and Parish Council responses say that yes the LPP2 should identify priority areas and ensure that the health needs of an aging population are considered. All respondents to this question raise the issue of having an up to date robust evidence base of supply and future demand of built health care facilities across the whole district.

The public health team at NCC say that a specific policy on health and wellbeing is required to contribute and ensure sustainable development. This should include built health infrastructure (co-location with other facilities) as well as designing places to allow people to achieve a healthier lifestyle and incorporate process (health impact assessment) to ensure each development mitigates negative health impacts and takes opportunities to promote good health. It is acknowledged that the JCS combined with the LPP2 can make a positive contribution to health and wellbeing across the different themes (transport, design, open space, facilities, GI, pollution, food provision and management, built environment).

Sport England highlight a guide they have on active design that can be used for new development.

Another highlighted concern is housing for health professionals alongside attracting them to work in the area in the first place.

### **Site specific allocations (Q27-Q32)**

#### ***Q27-Q28 Rushden***

Respondents have considered whether there is a need for the Local Plan Part 2 to provide further detail relating to the delivery of Rushden East and/ or further development sites around the town. ENC Housing Strategy has highlighted the need to deliver older persons' accommodation at Rushden East. Historic England, Environment Agency and Gladman have considered the role of the emerging masterplan in highlighting further policy requirements for Rushden East; e.g. water management, protection and enhancement of heritage assets. Sanders and LXB 3 have proposed further strategic land allocations at Rushden.

#### ***Q29 Housing requirements (Oundle)***

Promoters of land to the north of Oundle (Charles Lane, Northamptonshire County Council and Living Land) have emphasised the need to provide for the outstanding residual housing requirement at the town. Charles Lane has emphasised the need to review previous site assessment work in identifying land to deliver the remaining strategic requirement (200-210 dwellings).

#### ***Q30 Irthlingborough East Employment Area***

Representations have considered the approach that the Local Plan Part 2 should take in respect of the Irthlingborough East employment area. Historic England and Higham Ferrers Town Council support the principle of developing a specific policy in respect of Irthlingborough East/ Nene Park. Davidsons (landowner, Nene Business Park) however, emphasises that the two main parts of the area are in entirely separate ownerships and should be treated as such.

#### ***Q31 Deenethorpe Airfield***

Several respondents considered how the Deenethorpe Garden Village could be effectively implemented. Sport England, Anglian Water, ENC Housing Strategy, Gladman and the Environment Agency have all put forward arguments as to how a sustainable development could be delivered; e.g. in terms of health/ wellbeing and water management. The National Trust and Corby Borough Council have reiterated previous concerns, regarding the impact of the proposals upon the setting of Lyveden New Bield, Deene Park and the strategic highway network and Weldon village.

#### ***Q32 Contingency sites***

A large number of respondents have commented upon the need to include contingency sites, in order to maintain a deliverable housing land supply. Higham Ferrers Town Council, Persimmon Homes, Investment Land International, Sanders, Burghley House/ Hollins, Society of Merchant Venturers, Catesby Estates, Davidsons, LXB 3 and Living Land have all emphasised that the Local Plan Part 2 should include such a contingency, although the Town Council raised concerns about three sites identified in the Call for sites paper. Additionally, Gladman and Blatherwycke Estate have also argued that the Plan should allow for further



sustainable rural site allocations. Stanwick Parish Council opposes the inclusion of contingency sites.

### **Evidence base (Q33-Q34)**

Several respondents have commented upon the current evidence base (Regulation 18 document, Appendix 3). Northamptonshire County Council (Lead Local Flood Authority) and the Environment Agency support reference to documents such as the Local Flood Risk Management Strategy. Other respondents (Persimmon, Investment Land International, Gladman, Historic England, Catesby Estates, Davidsons and LXB 3) have all commented about the age of certain evidence documents. The following documents have been highlighted, for reference or updating:

- Wastewater strategy (Anglian Water), although this matter is covered by JCS Policy 5
- Strategic Housing Market Assessment update
- Accommodation and Support Needs of Older People in Northamptonshire, final report due, May 2017 (ENC Housing Strategy)
- Site assessment, to support site selection process (Gladman)
- Conservation Area Appraisals (Historic England)
- North Northamptonshire Detailed Water Cycle Strategy (WCS), 2009 (Environment Agency)
- Woodford Community Plan (Woodford Parish Council)
- Employment Land Review update (Catesby Estates, Davidsons)
- Respond to housing White Paper (Davidsons)
- Strategic Flood Risk Assessment update (Northamptonshire County Council)
- Town and Country Planning Association – reuniting health with planning initiative – <http://www.tcpa.org.uk/pages/health.html>
- Town and Country Planning Association – Planning Healthy Weight Environments initiative - <https://www.tcpa.org.uk/healthyplanning>
- NHS Healthy New Towns Initiative – <https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/>
- Spatial Planning and Health Group – <http://www.spahg.org.uk/>
- Northamptonshire's Joint Health and Wellbeing Strategy & Northamptonshire Sustainability and Transformation Plan – <http://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/Pages/health-and-wellbeing-strategy.aspx>
- Sport England Active Design document - <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

# **Sustainability Appraisal Scoping Report/ Habitat Regulations Screening Opinion responses**

## **Sustainability Appraisal**

### ***Methodology***

The assessment framework should be altered to take into account the rural nature of the district.

### ***Housing***

Natural England would like to see confirmation on the number of units that will be planned within 3km of the SPA and if that is in line with the JCS. If the number is higher then consideration will need to be given to amendments to the mitigation strategy.

Another respondent suggests that exceeding housing requirements would be unsustainable. A phased housing supply to maintain a 5 year supply is more sustainable.

### ***Health***

Outdoor activities should be referenced in relation to nature and health benefits and there should be inclusion and reference to more general countryside activity – informal walking, cycling etc.

### ***Crime***

Reference to rural and wildlife crime in the rural district.

### ***Biodiversity***

Support that habitat fragmentation is a major issues for the long term survival of protected species.

Alongside reference made to river corridors, woodland areas should be included in ecological connectivity. Many species use corridors to adapt to climate change, therefore is an important sustainability issue.

### ***Cultural Heritage***

Historic England considers this section to be too brief, and not sufficiently comprehensive on heritage assets. They consider that it would be beneficial to update the JCS SA objective to make sure it is NPPF compliant. They would want to see detailed site assessments to ensure a sound plan and are willing to assist on this.

### ***Flood Risk***

Change in terminology from watercourses to main rivers for Environment Agency (EA) responsibility.

The EA welcomes the content of this section to reduce the impact of flooding in the area. The EA flood map can be used to help inform policy direction. The Strategic Flood Risk Assessment (SFRA) will require updating to take account of new mapping and climate change work.

***Climate change***

Need to consider natural solutions to climate change not just technology.

***Energy***

Renewable energy development should consider impact on wildlife.

***Employment***

Recognition of the agricultural economy and importance in the district with diversification and impact of development.

**HRA (summary of Natural England response)**

Limited HRA screening, will need to be expanded.

Once policies have been finalised they will need to be screened on other matters such as functionality of linked land, water quality, water resources and air quality.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
001	001	26/01/2017	Little Addington Parish Council	n/a	Consultation process	Further to our conversation just now, I can confirm that Little Addington's response will be sent after its meeting on 14th March. As you say, any member of the Council can respond as an individual prior to this.
003	002	26/01/2017	Apethorpe Parish Meeting	n/a	Consultation process	How thoughtful of you to remember our conversation and bring this document to my attention. I have forwarded it to the Chairman of our Village Meeting so that it can be discussed at our next meeting.
007	001	14/02/2017	Higham Ferrers Town Council	n/a	Consultation process	I see the response date to this is 13th March. Is there any chance we could respond on 15th March. Sorry I have been off sick and realised it is at Planning tonight and it needs a bit more thought.
011	012	09/03/2017	Persimmon Homes Midlands	n/a	Overview	We recognise the benefits and support the principle of a single plan for the East Northamptonshire area, rather than the previous approach of different plans for different areas of the district. Our comments above are aimed at assisting in this process and we would welcome the opportunity for ongoing input as the plan progresses.
013	001	09/03/2017	Ringstead Parish Council	n/a	Consultation process	I write with regards to the consultation period for Regulation 18, to see if we can be granted an extension of time in which to lodge our comments. We have a planning committee meeting on Wednesday of next week, 15th March, and would be able to lodge our comments on the Thursday. We would be grateful if you could grant us the extension of time to the 16th march.
015	001	10/03/2017	North Northamptonshire Joint Planning Unit	n/a	Consultation process	I'm conscious that the deadline for the Reg 18 consultation is Monday. As previously discussed we will be reporting the consultation to the next Joint Committee, but this is not until 27th April. Do you require a holding response advising of this. If you require a more substantive holding response before the JPC then we may require some additional time.
016	001	10/03/2017	Bedford Borough Council	n/a	Consultation process	Thank-you for consulting Bedford Borough Council on your Local Plan (Part 2) under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which I read with interest. Whilst there is nothing discussed or proposed that this authority wishes to make comment on at this stage, your emerging Plan will remain pertinent to this Council and I would ask that you continue to inform and consult us as your Plan proceeds and your specific proposals develop.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
017	001	10/03/2017	Gladman Developments Ltd	n/a	Consultation process	Gladman Developments Ltd. (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission sets out representations from Gladman on the East Northamptonshire Local Plan Part 2 (Site Specific Policies), which has been issued for consultation under Regulation 18 between 27 January 2017 and 13 March 2017. Gladman have land interests in East Northamptonshire Council's administrative area and are keen to be involved in the plan making process.
017	003	10/03/2017	Gladman Developments Ltd	n/a	Neighbourhood Plans	Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that they must be consistent with national and local planning policy and take account of up-to-date housing needs evidence for the wider local authority area. As part of this, the local planning authority should carefully consider the positive role that settlements across its area can play in supporting the delivery of much needed market and affordable housing. The Plan also represents an opportunity to identify the development needed within support settlements across the hierarchy to fully their future sustainability.
017	004	10/03/2017	Gladman Developments Ltd	n/a	Neighbourhood Plans	The preparation of Local Plan Part 2 provides an opportunity to ensure that the development plan contains a comprehensive suite of policies to enable sustainable development opportunities. It is therefore considered vital that policy direction contained within any made or emerging neighbourhood plans is carefully assessed and supplemented wherever necessary through the policies and supporting text that will form the Local Plan Part 2.
018	001	10/03/2017	National Trust	n/a	Neighbourhood Plans	The boxed text at the end of Section 2 suggests that Neighbourhood Areas will be excluded from the Local Plan Part 2. Is this the usual approach in areas where there are Neighbourhood Plans? If/ when a Neighbourhood Plan becomes out of date or is withdrawn, there is a risk that this approach will result in an absence of appropriate policies. It may be possible to address this issue by including a hook in the policy to ensure that, should a Neighbourhood Plan become out of date or in any other way defunct, the Local Plan Part 2 policies will apply.
018	002	10/03/2017	National Trust	n/a	Legislation [Planning Acts]	Paragraph 5.1 refers to the Planning and Compulsory Purchase Act 2004 as a main act of Parliament governing Local Plans, which led to preparation of two-part plans. It would be helpful if the Plan also noted that this Act has since been amended, with the NPPF providing additional guidance, and that many local authorities now favouring a single Local Plan document.

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
019	001	11/03/2017	Chelveston cum Caldecott Parish Council	n/a	Consultation process	The Parish Council supports the consultation, but would request that ENC ensures that the Part 2 Local Plan does not undermine any policies (such as settlement boundaries) or site specific allocations in any recent NDPs that have been adopted in the District, as per para 2.5 of the Reg 18 consultation.
020	001	13/03/2017	Historic England	n/a	Consultation process	The production of a new Local Plan represents a significant opportunity for the protection and enhancement of the historic environment within the District. We are happy to provide further advice on this as necessary and we would be willing to meet with you to discuss policy development and site allocations.
020	002	13/03/2017	Historic England	n/a	Consultation process	Historic England's responsibilities, as the Government's adviser on the historic environment, include the protection and management of England's historic assets. In planning terms, this role includes providing advice to ensure that statute and national policy, particularly in the National Planning Policy Framework (NPPF), are reflected in local planning policy and practice. Historic England is consulted on Local Plans under the provisions of the Town and Country Planning (Local Development) (England) Regulations 2004.
020	003	13/03/2017	Historic England	n/a	Consultation process	Historic England promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The historic environment should therefore play a critical role in sustainable development at the heart of all spatial planning work, as reflected within the National Planning Policy Framework (NPPF).
020	004	13/03/2017	Historic England	n/a	Consultation process	Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward as part of the Local Plan.
020	005	13/03/2017	Historic England	n/a	Consultation process	Please note that Historic England have recently published advice notes. They may be of relevance to the update of the Local Plan. Specifically, Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans and Historic Environment and Good Practice Advice Note 3: The Setting of Heritage Assets may be of particular interest to you and may provide additional information in relation to our answers to your consultation questions below. These can be accessed via the following link: <a href="https://www.historicengland.org.uk/advice/planning/planning-system/">https://www.historicengland.org.uk/advice/planning/planning-system/</a>

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
020	006	13/03/2017	Historic England	n/a	Consultation process	Historic England has also recently published a document relating to site allocations in Local Plans – this covers all types of allocation and sets out a site selection methodology in relation to heritage assets. We consider this may be of use to you, and the document can be downloaded from: <a href="http://www.historicengland.org.uk/images-books/publications/historic-environmentand-site-allocations-in-local-plans/">http://www.historicengland.org.uk/images-books/publications/historic-environmentand-site-allocations-in-local-plans/</a>
020	007	13/03/2017	Historic England	n/a	Consultation process	Guidance in relation to Sustainability Appraisals can be found here:- <a href="https://historicengland.org.uk/images-books/publications/strategic-environmentassessment-sustainability-appraisal-historic-environment/">https://historicengland.org.uk/images-books/publications/strategic-environmentassessment-sustainability-appraisal-historic-environment/</a>
021	018	13/03/2017	John Martin Associates	n/a	Housing requirements (windfall allowance)	The summary conclusion on housing requirements confirms that no further rural housing land allocations are required for the rural area, as the identified strategic residual requirement of 220 dwellings would be expected to come forward through small scale windfall developments. However whilst a windfall allowance of 41 dwellings per annum, based on the historic delivery rates of small sites was agreed by the Planning Policy Committee on 21 November 2016 for inclusion in the 5 year land supply calculation, there is no evidence that such a level of windfall allowance can reasonably be sustained over the period beyond 2022, the end of the projected 5 year period given that by their very nature the availability of windfall sites will decrease over time.
021	019	13/03/2017	John Martin Associates	n/a	Housing requirements (windfall allowance)	With an over-reliance on delivery of housing completions to meet the strategic housing requirements in the rural area from windfall sites there is no opportunity for sustainable housing development to be provided through the allocation of housing sites in those villages, such as Warmington which have the existing services, facilities and infrastructure base to support additional growth. The potential consequence of this approach is that the rural villages are likely to at best simply stagnate if not decline particularly in terms of individual service provision which ultimately will lead to a reduction in the overall sustainability of development throughout the rural area.
025	001	13/03/2017	Silverbee Developments Ltd	n/a	Representation	Representation submitted by Phillips Planning Services Ltd on behalf of Silverbee Developments Ltd, repeating representations submitted on behalf of Investment Land International (ref 012).
030	001	13/03/2017	Persimmon Homes East Midlands	n/a	Representation	Representation submitted by Persimmon Homes East Midlands, repeating representations submitted on behalf of Persimmon Homes Midlands (ref 011).



## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
032	001	13/03/2017	Environment Agency	n/a	Consultation process	Thank you for inviting our comments on the initial statutory consultation for East Northamptonshire's Local Plan Part 2. We are happy to have met with your Authority and other stakeholders on 21 February to discuss any Local Plan related gaps, issues and opportunities at a high level.
032	011	13/03/2017	Environment Agency	n/a	Consultation process	Thank you for providing us with the opportunity to review the SA scoping report and the Reg. 18 consultation document. We look forward to continuing to work in partnership with your Authority to help ensure that the SA is comprehensive and the plan's contribution to sustainable development in East Northamptonshire is maximised.
034	028	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	Table 5 of the NNJCS sets out the minimum housing requirement for EN. It specifically sets out that the LPP2 or Neighbourhood Plans will identify sites to deliver the housing requirement for the Growth Towns, Market Towns and the named Villages in Table 5.
034	029	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	Given the housing requirement is a minimum, it also sets out that the LPP2 or Neighbourhood Plans can plan for higher levels of housing provision at individual settlements where this meets identified local needs and aspirations.
034	030	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	We acknowledge that a shortfall exists in Rushden and Oundle and agree that further allocations should be made in the LPP2 to address this. However, we do not agree with the approach for the Rural areas for reasons we set out below.
034	031	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	The NNJCS encourages development to meet the local needs and aspirations in rural areas. It specifically requires local needs to be evaluated through Part 2 Local Plans and/or Neighbourhood Plans. For EN, the rural housing requirement of 820 dwellings is a minimum and, unlike the other authorities in the area, the figure was not derived from local needs surveys and /or assessment of development opportunities. It is merely an estimate of the supply based on a continuation of past rates of 'windfall' development. It is therefore a baseline requirement and is not a target. Para 9.20 of the NNJCS is clear that the rural housing requirement in Table 5 should be planned for and where windfall allowances is proposed there must be compelling evidence that this will continue to be a reliable source of supply.
034	032	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	Whilst we acknowledge the average windfall allowance of 41dpa was used to derive the baseline requirement for the Rural area, we remain mindful that it is not an evidence based approach. It is therefore fundamentally wrong to rely wholly on windfalls. There must be acknowledgement of the role the LPP2 can play in identifying larger sustainable villages capable of accommodating some planned provision.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	033	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	The Lp2 must give weight to the role of local communities in identifying and meeting their own needs for development. It should acknowledge and provide support for Community led plans (e.g. NPs) and set out the appropriate mechanisms whereby local communities can identify the vision for their village and what is required to deliver it.
034	034	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	Additional growth should be encouraged where this would support the retention of or improvement to essential local services such as local shops or schools. The distribution of the rural housing requirement must be set out in the Lp2 according to the local need of each village and their role within the hierarchy.
034	035	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	The Lp2 consultation document states that the residual housing requirement for the Rural area is only 220 dwellings and suggests that this can be met by achieving rural windfalls of 15 dwellings per year. The provision of 15 dwellings per year until 2031 will result in only 225 further dwellings being provided in the Rural area, which would mean that the minimum overall requirement of 820 would only be exceeded by 5. This approach of a having a 0.6% buffer does not respond positively to the NPPF requirement to significantly boost housing.
034	036	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	The Lp2 states that the Council has agreed a windfall allowance of 41 dwellings per year and it is assumed that this relates to the entire EN district. If the LPA is to rely upon 15 of these 41 windfall dwellings to come forward in the Rural Area, it must provide compelling evidence for the first 5-years, as confirmed in the National Planning Practice Guidance (Ref: 3-24-20140306); the LPA must also comply with para. 48 of the NPPF to justify an allowance in years 6 – 15.
034	037	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	Furthermore, the Lp2 states that the LPA considers windfall sites to be those less than 5 dwellings. On this basis, it is very likely that none of the minimum 220 residual requirements will be affordable homes. This will not result in the creation/continuance of sustainable rural communities in EN. There is a need for affordable homes in the Rural area and the Lp2 must allocate sites for housing to plan positively for this need.
034	038	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	Affordable housing delivery is a major issue given the reliance on smaller windfall sites of between 1 and 5 dwellings. The affordable percentage in the Rural areas is 40% as set out in the NNJCS, given the issues of affordability. We note the Inspectors comments (at Para 59) which altered the trigger requirement to '11 or more dwellings' rather than '5 or more'. This approach reflects prevailing national policies; attempting to deliver more affordable homes where needed.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	039	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Housing requirements	We note the Inspectors comments in terms of the rural areas and specifically mentions that levels of new development envisaged in the smaller settlements and rural area generally are essentially appropriate in all relevant local circumstances. Indeed, the Inspector acknowledged that above the identified requirement that some limited development continues to be justified in the rural areas to help meet locally identified needs, particularly for employment, services and / or affordable housing. Therefore, it is not sound to rely on windfalls and not plan for the rural areas.
034	055	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Overview	The NNJCS sets out a policy requirement for a minimum provision of homes to rural areas. It is important that some villages outside those identified in Table 5 of the NNJCS accommodate additional development to deliver both market and affordable homes.
034	056	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Overview	The LPP2 needs to build on the NNJCS and must include detailed policies to guide decision making in EN to 2031. For the rural areas, it must provide an opportunity to promote higher order villages to accommodate modest growth particularly in locations close to larger higher order settlements. Further evidence is required to ensure a sound plan is submitted for Examination. A full review of rural settlements must be undertaken and district wide housing needs assessed where possibly.
034	057	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Overview	The LPP2 must set out the different forms of development that will be considered for each tier of settlement. For example, in higher order rural settlements, development that meets any identified local market or affordable housing needs for that village or a neighbouring small / secondary village (where no suitable sites exist) must be deemed appropriate and supported by policy.
034	058	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	n/a	Overview	It should also acknowledge support for the provision or enhancement of community facilities immediately adjacent to the settlements. Such policies would provide the necessary guidance for Neighbourhood Plans. HSL would welcome a meeting with the LPA to discuss this consultation response and the allocation of land south of Stamford Road, Easton on the Hill.
036	006	13/03/2017	Society of Merchant Venturers	n/a	Housing requirements	It is noted that the housing requirement for Thrapston has already been met from completions and existing commitments with over 14 years of the plan period remaining (paragraph 10.1 of the Consultation Document) - as a result the Local Plan Part 2 proposes to not allocate any further housing land allocations in Thrapston.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
036	007	13/03/2017	Society of Merchant Venturers	n/a	Housing requirements	However, in accordance with Paragraph 49 of the NPPF, the Council should be seeking to “boost significantly the supply of housing [our emphasis]”. The housing requirements in the JCS are not a ‘cap’ on development and the Local Plan Part 2 should assess the options for allocating significant additional growth - indeed, arguably there is potential to increase delivery across the settlement hierarchy through site allocations in order to increase dwelling provision overall.
036	008	13/03/2017	Society of Merchant Venturers	n/a	Housing requirements	To ensure sustainable delivery, in accordance with the key principles of the NPPF and JCS, development should be focused at the most sustainable locations in the District. As a ‘Market Town’, Thrapston has access to a wide range of facilities and services and local employment opportunities. Therefore, given the range of services it currently offers, Thrapston is capable of accommodating significant additional growth and development to enhance its role as a ‘Market Town’ in accordance with Policy 11 of the JCS.
037	001	13/03/2017	Catesby Estates	n/a	Consultation process	Catesby is keen to ensure that the Local Plan Part 2 achieves the growth ambitions set by NNJCS. We respond to the relevant questions, which form the Regulation 18 consultation document in turn below.
037	034	13/03/2017	Catesby Estates	n/a	Consultation process	We trust that the information provided within these representations will be considered by the Council and we welcome the opportunity to engage and promote the site through progression of the Local Plan Part 2.
037	001	13/03/2017	Davidsons Developments Ltd	n/a	Consultation process	This Local Plan Part 2 must be prepared in accordance with the wider vision and objectives established in the Local Plan Part 1 and the North Northamptonshire Joint Core Strategy (NNJCS). The Local Plan Part 1 and the NNJCS covers the plan period 2011-2031, as such it is accepted that this plan must also cover the same plan period. By the time the Local Plan Part 2 is adopted (anticipated adoption in 2019), the plan period will be well underway and as such only 12 years will remain. This is below the NPPF guidance of a ‘minimum’ of 15-year period established in paragraph 157 of the NPPF. It is however acknowledged that Inspectors have accepted Part 2 Plans with shorter time frames and that the White Paper reiterates the need for Plans to be regularly updated.
038	002	13/03/2017	Davidsons Developments Ltd	n/a	Consultation process	It is also important that the Local Plan Part 2 remains flexible to ensure that it can take account of any changes in the NNJCS or any forthcoming Neighbourhood Plans. This ability to remain flexible needs to be balanced against the need to provide a clear guidance for growth within the district.

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
038	034	13/03/2017	Davidsons Developments Ltd	n/a	Overview	In conclusion, we welcome this opportunity to comment on the Local Plan Part 2. We look forward to reviewing future versions of the Plan and would appreciate further opportunities to comment as the Plan emerges. Although this is obviously an early stage of the plan's preparation, on balance, we are supportive of the Local Plan Part 2 and east Northamptonshire's proactive approach in the preparation of a Plan that ensures the development needs of the district are met in a planned and sustainable way.
041	001	13/03/2017	Hargrave Parish Council	n/a	Consultation process	The Parish Council does not have comment to make.
007	002	01/03/2017	Higham Ferrers Town Council	Q01	Framework/structure	The Local Plan Part 2 should provide the same structure as that developed through the former Four Towns Plan Structure.
010	001	01/03/2017	Stanwick Parish Council	Q01	Framework/structure	option b
012	001	09/03/2017	Investment Land International	Q01	Framework/structure	Given that the purpose of the Part 2 Local Plan is to support the implementation the strategy set out in Part 1, it is considered highly important that these documents are interconnected and consistent to ensure that the development plan is able to be utilised efficiently and is not subject to contradiction.
017	005	10/03/2017	Gladman Developments Ltd	Q01	Framework/structure	Gladman are of the view that the structure that was previously set out in the Four Towns Plan is a suitable basis for a district wide plan. As set out above, it is vital that the content of the plan provides a comprehensive suite of policies and it is considered that this could realistically be achieved by applying the broad structure of the former Four Towns Plan.
018	003	10/03/2017	National Trust	Q01	Framework/structure	<p>Either option a or b would be fine provided that (i) all policy requirements of the NPPF are adequately discharged, and (ii) other matters of particular importance or interest are included.</p> <p>Taking forward the Four Towns Plan structure would presumably make most efficient use of resources by avoiding any abortive work. However, it may need to be adjusted to make sure that relevant policies are provided to cover all issues/areas across the district.</p>
021	001	13/03/2017	John Martin Associates	Q01	Framework/structure	The principle purpose of the North Northamptonshire JCS is to provide the strategic context and policy framework to be further developed through the Part 2 Local Plans by way of individual development proposals. In this case the Local Plan Part 2 therefore needs to be in general conformity with the JCS and it is considered that it would be more appropriate to incorporate a framework and structure into the Local Plan Part 2 which more reflects that of the strategic document.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	001	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q01	Framework/structure	The Lp2 will need to reflect the adopted North Northamptonshire Joint Core Strategy 2011-2031 (NNJCS). Para 5.1 is specific in that it sets out the framework for more detailed policies to form Part 2 Local Plans. It clearly sets out the spatial strategy for East Northamptonshire (EN), recognising the importance of rural areas.
034	002	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q01	Framework/structure	The Four Towns Plan structure should not form the basis of the Lp2 and must be amended to reflect the spatial framework identified in the NNJCS, having regard to Table 5 distribution strategy. Option B will therefore ensure the soundness of the plan.
034	003	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q01	Framework/structure	We support the sub-area distinction set out in Figure 4 and whilst we acknowledge that the sub-area is focused upon Corby and Kettering, we feel the evidence also suggest there must be recognition of settlements in close proximity to Stamford and Peterborough within the Northern sub -area, particularly the rural part. Considering this, Figure 3 requires updating to show the A1 corridor and identify Stamford.
037	002	13/03/2017	Catesby Estates	Q01	Framework/structure	The Four Towns Plan first published for consultation in November 2012 only sought to address the needs of the south of the District, including the towns of Raunds, Irthlingborough, Higham Ferrers and Rushden. The Plan did not consider the northern half of the District.
037	003	13/03/2017	Catesby Estates	Q01	Framework/structure	The Four Town Plan was informed by the evidence base for the Core Spatial Strategy ('CSS'), adopted in 2008 which is now out of date having been replaced by the NNJCS adopted in July 2016.
037	004	13/03/2017	Catesby Estates	Q01	Framework/structure	The Four Towns Plan was prepared in a previous planning context to that which now exists. As we make the case below, the District's settlement hierarchy needs to be comprehensively reviewed. The Local Plan Part 2 represents the opportunity to do this, reflecting the recently adopted NNJCS and latest relevant evidence.
037	005	13/03/2017	Catesby Estates	Q01	Framework/structure	In summary, we consider that the Local Plan Part 2 should not be based on any aspect of the previous strategy in the now abandoned Four Towns Plan.
020	008	13/03/2017	Historic England	Q01-Q05	Framework/structure	In accordance with legislation and national policy, heritage assets should be considered throughout the plan, and not just in the context of directly relevant policies.
007	003	01/03/2017	Higham Ferrers Town Council	Q02	Vision and Outcomes	The primary emphasis of the local Plan Part [2] should be to provide an urban-rural distinction, in accordance with JCS Policy 11(1) and 11(2) respectively
010	002	01/03/2017	Stanwick Parish Council	Q02	Vision and Outcomes	option a

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
012	002	09/03/2017	Investment Land International	Q02	Vision and Outcomes	It is again reiterated that it is understood that the purpose of the Part 2 Local Plan is to support the implementation of the strategic policies set out in Part 1. It is therefore considered that the plans should remain consistent with one another.
017	006	10/03/2017	Gladman Developments Ltd	Q02	Vision and Outcomes	In developing the vision and outcomes, it is important that the Local Planning Authority carefully considers the sustainability of settlements within its settlement hierarchy and their associated ability to contribute towards overall development needs over the plan period. The vision and outcomes should include a focus on the need to support thriving rural communities. This can be achieved by identifying the small and medium sized sites that are necessary to meet housing needs whilst securing and maintaining a level of services that are vital to their future sustainability.
018	004	10/03/2017	National Trust	Q02	Vision and Outcomes	With the JCS recently adopted, is it necessary to provide a second area portrait, vision and outcomes, or will this result in duplication and complexity?
021	002	13/03/2017	John Martin Associates	Q02	Vision and Outcomes	The primary emphasis of the Local Plan Part 2 should be to develop a policy framework which reflects that of the JCS. In this regard it would be appropriate that the policy approach in the Part 2 Local Plan is that of the urban-rural distinction in accordance with that set out in JCS Policy 11. Whilst Policy 11 confirms that development will be distributed within the network of settlements in accordance with the individual spatial role set out in JCS Table 1, there is considered to be certain flexibility within Policy 11 to enable individual villages to be identified in the Part 2 Local Plan to accommodate a greater scale of development where these are led by locally identified requirements.
034	004	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q02	Vision and Outcomes	It is necessary that option B is taken forward and assessment made to understand the benefits of planned growth to rural areas as opposed to reliance on windfall sites.
034	005	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q02	Vision and Outcomes	The LPp2 provides an opportunity to ensure that the most sustainable development options are carried forward through the LP period to 2031 in accordance with the requirements of national policy. An assessment of the Rural area must be carried out to ascertain which of the most sustainable Rural Sub-Areas should accommodate the minimum residual requirement for the Rural area.
034	006	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q02	Vision and Outcomes	Sub-Areas should be considered in the context of accessibility to Growth and Market Towns within EN, as well as higher order settlements in neighbouring authorities that provide employment opportunities and a good range of local services and facilities.



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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	007	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q02	Vision and Outcomes	Easton on the Hill is situated at the northern tip of EN and is reasonably well connected to Corby. However, it is very well connected to the nearby town of Stamford which offers significant employment opportunities, services and facilities, including excellent public transport links via the bus and rail network. It is one of the larger villages in EN. The interconnectivity between Easton on the Hill and Stamford must inform the spatial strategy of the LPP2. Furthermore, the accessibility to Peterborough, being another regional centre, must also be recognised in terms of rural distribution of housing.
034	008	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q02	Vision and Outcomes	It is also necessary to consider how the minimum 820 dwellings for the Rural Area is divided amongst the settlements to ensure a sustainable split is delivered across EN that addresses local needs. The LPP2 must consider where completions and commitments have been delivered in the Rural Area thus far and determine whether 'affordable' provision is being delivered in line with requirements. It must then ascertain whether higher scoring rural settlements should accommodate development or whether other parts of the Rural Area should benefit from additional market and affordable housing beyond the baseline requirement of 820 dwellings.
036	001	13/03/2017	Society of Merchant Venturers	Q02	Vision and Outcomes	The Local Plan Part 2 should continue the urban-rural distinction in accordance with JCS Policy 11. Policy 11 of the JCS provides a clear spatial strategy for the distribution of new development within the District - with the emphasis of growth on the 'the urban areas' (i.e. Growth Towns and Market Towns).
036	002	13/03/2017	Society of Merchant Venturers	Q02	Vision and Outcomes	Indeed, Thrapston is identified as a Market Town and the JCS confirms that Market Towns "will provide a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town [our emphasis]". Accordingly, 'the urban areas' - such as Thrapston - should take a significant proportion of growth in the District and this should be reflected in the vision and outcomes of the Local Plan Part 2.
037	006	13/03/2017	Catesby Estates	Q02	Vision and Outcomes	In developing the Vision and Outcomes Catesby considers that the primary emphasis of the Local Plan Part 2 should be to establish an urban-rural distinction, in accordance with NNJCS Policies 11(1) and 11(2) respectively. Further spatial distribution between the north and south of the District (reflecting the now abandoned Four Towns Plan) is not supported.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
037	007	13/03/2017	Catesby Estates	Q02	Vision and Outcomes	There is currently no adopted settlement hierarchy for the District as a whole. The Rural North, Oundle and Thrapston Plan ('RNOTP') (adopted in 2009) provides a settlement hierarchy for the north of the District only; albeit it is based on out of date evidence. There is no Development Plan Document which establishes a hierarchy for the south of the District, with the Three Towns Plan, then the Four Towns Plan, both being abandoned.
037	008	13/03/2017	Catesby Estates	Q02	Vision and Outcomes	The NNJCS Inspector makes clear in his report (paragraphs 93 and 94) that the settlement hierarchy established in the NNJCS constitutes a 'straightforward approach' to guide each of the constituent Councils in the preparation of their Part 2 Local Plans.
037	009	13/03/2017	Catesby Estates	Q02	Vision and Outcomes	Although figure 15 of the NNJCS identifies two sub-areas for the North Northamptonshire area, the Plan still establishes a simple, single settlement hierarchy that applies to the whole of the area (as recognised by the Inspector). For instance, the 'Market Towns' category includes settlements in both the north and south sub-areas. It is therefore considered that the Local Plan Part 2 should establish a consistent settlement hierarchy for the District as a whole. Failure to do so risks sustainable settlements in the north of the District receiving less development based on the existing RNOTP settlement hierarchy, rather than their sustainability to accommodate development based on up to date evidence.
038	003	13/03/2017	Davidsons Developments Ltd	Q02	Vision and Outcomes	In developing the Vision and Outcomes, the emphasis of the Local Plan Part 2 needs to be carefully balanced to ensure sufficient development is provided to meet the growth requirements of the District while ensuring the character of the district is maintained. The character of each settlement needs to be considered to ensure that the proposed development is in keeping with the area rather than an urban rural distinction or identifying separate northern and southern / urban and rural sub-areas.
038	004	13/03/2017	Davidsons Developments Ltd	Q02	Vision and Outcomes	A coherent approach to development needs to be adopted rather than an approach which seeks to provide separate and distinct approaches the separate sub-regions. The Vision and Outcomes need to be carefully considered to ensure that this is achieved.
043	001	13/03/2017	LXB 3	Q02	Vision and Outcomes	LXB consider that the Local Plan Part 2 should reflect an urban-rural distinction. To accord with the spatial strategy and provisions of the North Northamptonshire JCS, the Growth Town of Rushden and those areas around it should form the focus for future development in the district.
011	001	09/03/2017	Persimmon Homes Midlands	Q03	Presumption in favour of sustainable development	The Planning Practice Guidance states that LPAs should avoid undue repetition. The Joint Core Strategy Policy 1 already sets out how the presumption in favour of sustainable development will apply locally and it is considered unnecessary for the plan to repeat it.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
017	002	10/03/2017	Gladman Developments Ltd	Q03	Vision and Outcomes	It is noted that East Northamptonshire District Council has moved away from its previous approach of sub-dividing the district and that Local Plan Part 2 will now be prepared as a district wide plan. Gladman welcomes this change as it will provide greater clarity to those with land and development interests in the area through the reduction in the number of DPDs that relate to the area.
017	007	10/03/2017	Gladman Developments Ltd	Q03	Presumption in favour of sustainable development	Local plans are required to be consistent with national policy and therefore the 'presumption in favour of sustainable development'. It is noted that the JCS includes a policy (Policy 1) which links the presumption in favour of sustainable development to the delivery of the vision and outcomes contained in the JCS. The preparation of the Part 2 Local Plan provides an opportunity to provide additional local distinctiveness in East Northamptonshire if necessary. Any further spatial division should be done so through careful consideration of the sustainability of all settlements within the hierarchy. This should include a process that establishes the policy requirements that are required to enable them to thrive.
018	005	10/03/2017	National Trust	Q03	Presumption in favour of sustainable development	It is probably not necessary to repeat or re-frame the JCS sustainable development policy and may lead to unnecessary duplication and complexity.
021	003	13/03/2017	John Martin Associates	Q03	Presumption in favour of sustainable development	The challenge for the Local Plan Part 2 is to reconcile the need to deliver sufficient jobs and homes supported by an appropriate infrastructure to meet the needs of East Northamptonshire whilst conserving the natural and built environment, minimising the need to travel and addressing climate change.
033	001	13/03/2017	Woodford Parish Council	Q03	Presumption in favour of sustainable development	Development in rural villages irrespective of size must be sustainable, but of equal importance must not inhibit the "quality of life" and well-being of existing residents.
033	002	13/03/2017	Woodford Parish Council	Q03	Presumption in favour of sustainable development	There must also be a demonstrated local need for development and in a climate where local people are frequently priced out of their home village they must be given priority to shared ownership / rental properties. If there is still a surplus then those with a direct connection to the village should then be considered.
034	009	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q03	Presumption in favour of sustainable development	There is no need for an additional 'district level definition' of the presumption. Para 14 of the NPPF provides a clear direction in applying the presumption in favour of sustainable development in addition to Policy 1 of the NNJCS. These should be referred to in any explanatory text.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	010	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q03	Presumption in favour of sustainable development	Paragraph 11 of the Local Plans section of the NPPG (Reference ID: 12-011-20140306) highlights paragraphs 14 and 15 of the NPPF
034	011	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q03	Presumption in favour of sustainable development	The Planning Inspectorate has provided a model policy for Local Plans.
035	001	13/03/2017	Blatherwycke Estate	Q03	Presumption in favour of sustainable development	Whilst the policy direction of the JCS is welcomed as a strategic framework, it is important that the East Northants Local Plan Part 2 recognises the nuances and characteristics of the different types of settlements that are located within the District. Growth levels should reflect this diversity and not be unnecessarily constrained because of a generic policy grouping of all settlements below Market Town level.
035	004	13/03/2017	Blatherwycke Estate	Q03	Presumption in favour of sustainable development	In addition to the provisions within the National Planning Policy Framework, the Housing White Paper, February 2017 recognises the importance of allowing rural communities to grow and thrive.
036	003	13/03/2017	Society of Merchant Venturers	Q03	Presumption in favour of sustainable development	No, our client considers that the presumption in favour of sustainable development as defined within the NPPF and Policy 1 of the JCS is adequate.
037	010	13/03/2017	Catesby Estates	Q03	Vision and Outcomes	Reflecting the NPPF, NNJCS Policy 1 'Presumption in Favour of Sustainable Development' sets out how the presumption will be applied. It is therefore considered unnecessary to elaborate further, particularly as there are other policies within the Part 2 Plan which seek to protect and enhance the local distinctiveness of the District.
038	005	13/03/2017	Davidsons Developments Ltd	Q03	Presumption in favour of sustainable development	The National Planning Policy Framework (NPPF) clearly establishes that the purpose of the planning system is to contribute towards the achievement of sustainable development. As such, this needs to be 'the golden thread' running through plan making. The three dimensions of sustainable development, i.e. the economic role, social role and environmental role all need to be carefully balanced in the determination of any planning application made. This needs to be reflected in the Local Plan Part 2 to ensure it is in accordance with the NPPF.
038	006	13/03/2017	Davidsons Developments Ltd	Q03	Presumption in favour of sustainable development	If the presumption in favour of sustainable development is a core objective throughout the Plan, it should not be necessary to provide additional local distinctiveness through a district-level presumption in favour of sustainable development.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
043	002	13/03/2017	LXB 3	Q03	Presumption in favour of sustainable development	As the most sustainable location for development in the district, Rushden should be recognised as the focus point for future growth in ENDC. Policies included within the Local Plan Part 2 should promote and support development which brings economic and social investment/ benefits (including the creation of jobs, skills and training) to the town.
045	001	13/03/2017	Natural England	Q03	Presumption in favour of sustainable development	Climate change in the local context - Natural England would recommend that where possible the plan should provide details within the policy on the presumption of sustainable development which recognises local distinctiveness. For example requiring new development to incorporate green roofs and walls to take advantage of under utilised urban spaces and provide multi-functional benefits through flood management, biodiversity, climate change mitigation and by managing the heat island effect. Green roofs have been shown to reduce ambient temperatures by reducing night time heat radiation, increasing albedo (reflectivity), shielding building materials from the sun and storing water in substrates which provides evapo-transpirative cooling.
045	002	13/03/2017	Natural England	Q03	Presumption in favour of sustainable development	Greening roofs in areas with a high proportion of buildings is an effective strategy to reduce surface temperatures. This can also help reduce the need for air-conditioning buildings in summer and can insulate them in winter. Green roofs also offer potential biodiversity benefits providing new habitat in areas which are currently lacking in wildlife habitat. They also create new links in a fragmented network of habitats, thereby facilitating movement and dispersal of wildlife.
045	003	13/03/2017	Natural England	Q03	Presumption in favour of sustainable development	The plan could also include a policy for the protection of soils. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. For guidance on how adverse impacts on soils can be minimised please refer to Defra's Good practice guide for handling soils and Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.
007	004	01/03/2017	Higham Ferrers Town Council	Q04	Settlement Hierarchy	Yes there is a need for the Local Plan Part 2 to expand on the spatial strategy. The strategy should follow the earlier work undertaken in respect of the Four Towns Plan and use the detailed rural settlement hierarchy proposed therein.
010	003	01/03/2017	Stanwick Parish Council	Q04	Settlement Hierarchy	No

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011	002	09/03/2017	Persimmon Homes Midlands	Q04	Settlement Hierarchy	While the hierarchy of towns provides a clear structure, we feel there is a need for greater distinction between villages. Some villages in the district provide a clear local service role while others have little to no services. Creating further division within the Villages category will allow the sustainable growth of villages where this is appropriate given their size and function.
012	003	09/03/2017	Investment Land International	Q04	Settlement Hierarchy	As discussed, it is understood that it is the role of the Part 2 Local Plan to implement the strategic policies of the Part 1 Local Plan. It is therefore considered that the Part 2 Plan should be expanding and elaborating on this general strategy to identify how it is to be applied within East Northamptonshire.
012	004	09/03/2017	Investment Land International	Q04	Settlement Hierarchy	In regards to this, it is noted that the policy identifies that Local and Neighbourhood Plans will identify and allocate sites to meet the housing requirements of the rural area and demonstrate that housing need is being met.
012	005	09/03/2017	Investment Land International	Q04	Settlement Hierarchy	The formation of a settlement hierarchy, identifying large and small villages and the urban periphery would likely provide a useful framework for establishing the settlements and locations which are best placed for accommodating growth.
012	006	09/03/2017	Investment Land International	Q04	Settlement Hierarchy	With reference to the consultation supporting text, it is also noted that Stanwick would be classified as a 'Larger Freestanding Village'. Given that the village plays a valuable role as a service provider (the village contains a lower school, post office, public houses, places of worship, open space/play equipment/sports facilities and regular public transport links to larger settlements) it is concurred that this settlement would be in the top level of hierarchy as it is well placed to accommodate support growth and sustain these facilities.
012	007	09/03/2017	Investment Land International	Q04	Settlement Hierarchy	As will be noted, our clients' site at Land east of Raunds Road, Stanwick is promoted for housing in the context of this assessment.
017	008	10/03/2017	Gladman Developments Ltd	Q04	Settlement Hierarchy	The opportunity should be taken within Local Plan Part 2 to consider the relative sustainability of rural settlements and enable the levels of growth necessary to maintain or improve their vitality and viability. As set out in the consultation document, there is likely to be a vast variation between the rural settlements based on population and character. Indeed these variations will extend further when other matters relevant to their sustainability are considered such as the availability of key services and facilities.

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<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
017	009	10/03/2017	Gladman Developments Ltd	Q04	Settlement Hierarchy	Paragraph 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is therefore essential that the needs of the sustainable rural settlements across the district are assessed and a meaningful level of growth apportioned to them to ensure their ongoing vitality and viability. This will help to preserve and enhance rural services and facilities and allow local rural communities to meet their own needs for housing whilst providing much needed affordable or specialist housing in the parts of the district that are likely to suffer with the greatest affordable housing need.
017	010	10/03/2017	Gladman Developments Ltd	Q04	Settlement Hierarchy	It is important to consider existing services and facilities in a settlement when assessing their suitability for accommodating growth and any policy led strategy to improve their sustainability. Daily needs are particularly important with a primary school, shop and access to public transport being the key considerations. It must be recognised that there may be an ability, through new development, to improve some of these services and facilities, particularly access to public transport, that should be considered as well as the role that new development can play in ensuring these facilities are maintained and are not lost because of a lack of support.
017	011	10/03/2017	Gladman Developments Ltd	Q04	Settlement Hierarchy	Whilst it is recognised that some villages are small scale and the consideration of the setting and character of the settlement is important, these issues must be balanced against the needs of the local community for new housing, including affordable housing and the need to ensure the long term viability of the services and facilities within the village. It should also be recognised that increasing the number of settlements across the District with allocations for residential development will increase the rate of housing completions and as a result the ability to maintain a five-year housing land supply.
017	012	10/03/2017	Gladman Developments Ltd	Q04	Settlement Hierarchy	The Part 2 Local Plan should be looking to identify sustainable housing sites in East Northamptonshire's Principal Villages and Smaller Villages that can readily come forward to meet the market demand that exists in those specific areas. This approach would represent a positive response to addressing any housing shortfalls over the plan period. Gladman remain concerned that the JCS fails to identify the development that is needed in North Northamptonshire's rural settlements to ensure their future sustainability. The Part 2 Plan presents an opportunity to positively address such concerns whilst maintaining the overall ethos of the spatial strategy for the wider area.

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<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
019	002	11/03/2017	Chelveston cum Caldecott Parish Council	Q04	Settlement Hierarchy	It is also noted that most of the maps (e.g. Reg 18 consultation Fig 2) do not include the Chelston Rise settlement, which at 50 dwellings (and a further 10 consented) is larger than either the Caldecott or Newton Bromswold settlements.
021	004	13/03/2017	John Martin Associates	Q04	Settlement Hierarchy	Section 5.12 of the JCS as explanatory text to Policy 11 acknowledges the fact that individual villages vary greatly in their character, size and function. In addition there is confirmation provided in the JCS that: 'Part 2 Local Plans may identify a more detailed rural settlement hierarchy based on local evidence in order to guide planning decisions...' East Northamptonshire District as a rural authority does encompass a large number of villages, particularly in the northern half of the district and these undoubtedly vary in their character, size and function which makes it reasonable for a simple rural settlement hierarchy to be proposed in the Part 2 Local Plan in order to establish relative sustainability to accommodate additional development in the plan period.
021	005	13/03/2017	John Martin Associates	Q04	Settlement Hierarchy	In this regard the rural spatial categorisation proposed for the Four Towns area, as it relates to the classification of larger freestanding and smaller freestanding villages is based upon whether individual villages are of greater or lesser than 1,000 population, and whilst no evidence has been provided to justify such a threshold being used in the Part 2 Local Plan it is considered that the majority of those villages in the northern half of the district would fall well below the 1,000 population threshold.
021	006	13/03/2017	John Martin Associates	Q04	Settlement Hierarchy	Therefore in seeking to establish an appropriate village hierarchy the existing population of a village should not be seen as the principal determinate in establishing the appropriate spatial strategy for the villages, as consideration also needs to be had to the general sustainability of each individual village.
021	007	13/03/2017	John Martin Associates	Q04	Settlement Hierarchy	In this regard the settlement of Warmington is identified in the RNOTP as a Smaller Service Centre and is acknowledged as offering limited local services for its own population and a few surrounding villages. There is no evidence put forward to suggest that the service role of Warmington has significantly changed, however if the village hierarchy based on 1,000 population threshold were to be adopted, the significance of Warmington - Population 956 (Census 2011) as a settlement were additional development could reasonably be accommodated would be significantly reduced. However the overall sustainability of Warmington as a location for a modest scale of additional housing development has not significantly altered since the adoption of RNOTP.



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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
021	008	13/03/2017	John Martin Associates	Q04	Settlement Hierarchy	There is therefore the opportunity for the Part 2 Local Plan to include a simple village hierarchy which would identify those villages, including Warmington which are capable of accommodating a scale of sustainable development within and adjacent to the existing built up area as for example principal villages with the remainder of the rural villages as other villages restricted to infill development within the built up area.
024	001	13/03/2017	Francis Jackson Homes	Q04	Settlement Hierarchy	Within the Part 2 Local Plan, some reference needs to be made to distinguish between 'freestanding settlements' and those that are very closely related to higher tier settlements - this should be the case irrespective of the settlement size.
024	002	13/03/2017	Francis Jackson Homes	Q04	Settlement Hierarchy	Paragraph 55 of the NPPF specifically notes that development in one settlement may support services in centres - so this clustering and spatial relationship needs to be considered by policy - for example, Glapthorn is closely related functionally and spatially to Oundle and if that is not reflected in policy it may not reflect the reality if the settlement is purely defined by its own size or services within it.
024	003	13/03/2017	Francis Jackson Homes	Q04	Settlement Hierarchy	In essence, the porximity of villages to larger service centres or other larger villages needs to be reflected in local level policy to accord with the NPPF and not preclude sustainable development due to spatial relationships and service/ clustering networks.
033	003	13/03/2017	Woodford Parish Council	Q04	Settlement Hierarchy	Typology of villages - We question the use of population data to define a hierarchy of villages. Rather than using population figures we suggest a scale based upon the services a village can provide its population. This could include the number of shops, pubs, churches, sportsfields, school etc. And how accessible they are. It would also be necessary to take into account traffic issues etc
033	004	13/03/2017	Woodford Parish Council	Q04	Settlement Hierarchy	Woodford for example has two shops (takeaway and Post Office) yet parking nearby is near impossible reducing passing trade. Villagers also choose to travel to Thrapston or further afield.
033	005	13/03/2017	Woodford Parish Council	Q04	Settlement Hierarchy	Large scale development will only make matters worse traffic in the High Street worse.
034	012	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q04	Settlement Hierarchy	For the sake of soundness, the Lp2 will need to expand on the NNJCS strategy for rural villages to at least ensure that identified needs, particularly for employment, services and /or affordable housing are addressed whilst ensuring that new development is focussed in the most sustainable villages. The NNJCS recognises there is a need to deliver development in the rural area in the first instance and that the scale must be consistent with the objective of meeting local needs and supporting local services. Table 5 of the JCS sets out a rural housing requirement to EN.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	013	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q04	Settlement Hierarchy	To deliver this requirement, it is vital that a rural distribution strategy is identified in the LPP2, which is based on a settlement hierarchy and other evidence base in terms of settlement capacity. This approach would allow for the proper distribution of new homes, jobs and services needed in rural areas. The NNJCS Inspector (para 93) recognised the importance of rural areas and the importance of LP Part 2s to put 'flesh on the bones' of the overall policy approach with regard to individual settlements and therefore this approach will ensure soundness of the LPP2.
034	014	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q04	Settlement Hierarchy	As stated in the LPP2 consultation document, "the detailed RNOTP settlement hierarchy could be considered as overly complicated" and "there is no practical difference between Category B Villages and the Open Countryside" (para. 7.6). Indeed, the NNJCS evidence base found the approach of the RNOTP overly prescriptive and not in the spirit of localism.
034	015	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q04	Settlement Hierarchy	The disaggregation of the Rural area into larger and smaller villages dependent upon population, services/facilities and access to public transport would benefit the sustainability of the LPP2, particularly as it would be a useful tool when deciding where the residual Rural area minimum housing requirement should be located. This is therefore considered a sound approach.
034	016	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q04	Settlement Hierarchy	We note the extensive evidence base that already exists. For EN, the recommendations in the background paper entitled 'Developing a Settlement Hierarchy for the North Northamptonshire Joint Core Strategy' July 2012 must be the starting point and should form the basis of a settlement hierarchy. It proposed that a simplified settlement hierarchy (as set out in Appendix 4 of that report) represents an appropriate compromise and was recommended as the preferred approach in respect of defining a spatial strategy for the NNJCS. The LPP2 must follow these recommendations to ensure soundness.
034	017	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q04	Settlement Hierarchy	Using the above evidence base, it would be appropriate to ensure soundness of the LPP2 that a typology of settlements is identified that identifies the key Principal Villages such as Easton on the Hill.
035	002	13/03/2017	Blatherwycke Estate	Q04	Settlement Hierarchy	For example, the distinctions made within the Rural North, Oundle and Thrapston Plan (2011) between different rural settlements is helpful as it allowed for differentiation between those settlements with local facilities such as Kings Cliffe, which was identified as a Local Service Centre.

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035	003	13/03/2017	Blatherwycke Estate	Q04	Settlement Hierarchy	Local opportunities for sustainable development will arise throughout the plan period, and therefore it will be vital that the Local Plan Part 2 is sufficiently flexible to address these when they arise. Section 3 of the NPPF 'Supporting a prosperous rural economy' recognises the importance of supporting economic growth within rural areas to create jobs and prosperity by taking a positive approach to sustainable new development for a range of uses and activities.
037	011	13/03/2017	Catesby Estates	Q04	Settlement Hierarchy	There is a pressing need for the Local Plan Part 2 to expand upon the overall NNJCS spatial strategy and undertake a comprehensive review of the settlement hierarchy for the rural villages. With the NNJCS taking a straight forward approach to establishing a settlement hierarchy, which only acts as a guide, the Inspector was clear in his Report to the Examination (paragraphs 93 and 94) that "any alleged detailed inaccuracies in relation to smaller towns and villages are able to be addressed in Part 2 LPs".
037	012	13/03/2017	Catesby Estates	Q04	Settlement Hierarchy	As set out in response to Question 2 there is currently no settlement hierarchy which covers the full extent of the rural area. The RNOTP sets a hierarchy for the north of the District; however this is based on out of date evidence. It is also relatively crude in nature, grouping 46 rural villages into two categories. A more sophisticated approach is necessary if the rural area's needs are to be met in the most sustainable locations.
037	013	13/03/2017	Catesby Estates	Q04	Settlement Hierarchy	Given the number of villages within the District a more detailed settlement hierarchy is required with the most sustainable settlements (such as Islip which is ranked the second most sustainable village in the north of the District) identified as higher order settlements where growth should be directed towards.
037	014	13/03/2017	Catesby Estates	Q04	Settlement Hierarchy	At the NNJCS Examination we advanced the example of Stratford-on-Avon District Council's Core Strategy. This establishes a four tiered hierarchy for the rural area and scores each settlement based on its size and amenities.
038	007	13/03/2017	Davidsons Developments Ltd	Q04	Settlement Hierarchy	A hierarchy of development is considered appropriate in accordance with the North Northamptonshire Joint Core Strategy (NNJCS); this would provide developers with guidance on the level of development that would be appropriate. The Local Plan Part 2 needs to be carefully aligned to the NNJCS to ensure that the two plans do not have any conflict.
038	008	13/03/2017	Davidsons Developments Ltd	Q04	Settlement Hierarchy	We suggest consideration of a policy tool within Local Plan Part 2 to define village boundaries or criteria for such a definition, including sites proposed to be allocated. The lead for this is Table 1 'Spatial Roles' of the NNJCS.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
038	009	13/03/2017	Davidsons Developments Ltd	Q04	Settlement Hierarchy	The housing requirements for the District in Table 4 'Share of objectively assessed needs in the Housing Market Area' of the NNJCS should be considered a minimum as should the housing delivery in Table 5 'Housing delivery in named settlements'.
038	010	13/03/2017	Davidsons Developments Ltd	Q04	Settlement Hierarchy	The rural housing requirements in Table 5 of the NNJCS may be tested at higher levels of growth to address local needs and opportunities. The Local Plan Part 2 should explain the process for this. We would suggest that this process is not just left to neighbourhood plans.
007	005	01/03/2017	Higham Ferrers Town Council	Q05	Settlement boundaries	The preferred approach would be to consider town and village settlement boundary definitions separately e.g. define linear boundaries for urban areas only, using a criteria-based approach for villages?
010	004	01/03/2017	Stanwick Parish Council	Q05	Settlement boundaries	option a
011	003	09/03/2017	Persimmon Homes Midlands	Q05	Settlement boundaries	Option a) would be the most appropriate and flexible strategy, providing the criteria were flexible enough to allow for changing circumstances over the lifetime of the plan. This would allow the Council to respond swiftly to any shortfall in housing land supply without being constrained by rigid boundaries.
012	008	09/03/2017	Investment Land International	Q05	Settlement boundaries	In regards to this question, it is noted that the JCS promotes the use of 'settlement boundaries' and it is considered that the Part 2 Plan should be consistent with this approach.
012	009	09/03/2017	Investment Land International	Q05	Settlement boundaries	Furthermore, given that the local authority will be establishing through careful review and assessment, the scale of development and growth which may be accommodated by settlements and sustainable locations over the plan period, it is considered that the local authority should be taking a lead role in developing the extent of the 'boundaries'.
012	010	09/03/2017	Investment Land International	Q05	Settlement boundaries	Therefore, it is considered that the council should be comprehensively reviewing all settlements and sustainable locations to establish functional boundaries which have planned positively to enable growth during the plan period. The boundaries should incorporate allocations as well as other locations within which it is considered that development can be accommodated.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
017	013	10/03/2017	Gladman Developments Ltd	Q05	Settlement boundaries	The consultation document identifies a number of options for distinguishing between built up areas and the surrounding rural hinterlands. Whichever approach is selected, it should not restrict suitably located, sustainable development from coming forward if the need arises. The continued use of previously defined settlement boundaries should be avoided as they are likely to have been established alongside out-of-date national, regional and local planning policies and their associated development requirements. It is therefore necessary to comprehensively review the approach to managing development adjacent to settlements within the current planning context.
017	014	10/03/2017	Gladman Developments Ltd	Q05	Settlement boundaries	The use of settlement limits and/or criteria to arbitrarily restrict suitable development opportunities from coming forward on the edge of settlements should not be included in the Plan. Similarly, the introduction of arbitrary site size limits should also be avoided without clear and reasoned justification. A positive approach to the management of growth is required by the Framework and this applies to all urban and rural settlements whether named within the Settlement Hierarchy or not. Gladman would be opposed to the definition of the settlement edge within a local plan if this would preclude appropriately sited and sustainable development from coming forward to meet housing needs, in accordance with the 'Presumption in Favour of Sustainable Development'. Proposals that are sustainable should go ahead without delay. An overly restrictive approach could result in a plan that is not positively prepared or effective.
018	006	10/03/2017	National Trust	Q05	Settlement boundaries	Option [A] is not supported. Settlement boundaries are a tried and tested way of protecting open countryside from urban sprawl. It also cannot be assured that there will ever be comprehensive coverage of settlements by Neighbourhood Plans containing settlement boundaries.
018	007	10/03/2017	National Trust	Q05	Settlement boundaries	Option B is supported. Option C may be adequate depending on the associated policies. For example if further development at smaller villages is not supported then it may be acceptable for those villages not to have a boundary.
021	009	13/03/2017	John Martin Associates	Q05	Settlement boundaries	Village boundaries are a well-used planning tool for guiding, controlling and identifying limits to development for an individual village and to prevent unregulated development from encroaching into the countryside. Although the approach provides certainty the counter argument is that this is a relatively inflexible approach and can lead to the cramming of development within village confines resulting in a reduction in the character and environmental quality of a village.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
021	010	13/03/2017	John Martin Associates	Q05	Settlement boundaries	The JCS (5.18) provides the opportunity for the Part 2 Local Plan to establish development boundaries whether these are by way of defined boundaries or a criteria based approach; however the JCS (5.18) also acknowledges that village boundaries can provide a tool to plan positively for growth. In this regard it is imperative that a flexible approach is taken to the approach on village boundaries with the Part 2 Local Plan.
021	011	13/03/2017	John Martin Associates	Q05	Settlement boundaries	Defining village boundaries, as is the case in the RNOTP is seen as providing a greater degree of certainty in terms of the interface between the built up area of a village and the countryside; however this approach provides limited flexibility in considering the potential for sustainable development to come forward adjacent to a settlement boundary if this has not been planned for when the village boundary is initially defined. If village boundaries are to be defined in the Part 2 Local Plan then it is important that there is a consistent approach to the criteria used to determine how those boundaries are to be defined and those criteria would need to be identified and consulted upon.
021	012	13/03/2017	John Martin Associates	Q05	Settlement boundaries	In contrast a criteria based approach provides less certainty in terms of the interface of the village with the countryside, although potentially greater flexibility in terms of the opportunity to bring forward sustainable development adjacent to the built up area. A similar consistent approach would need to be adopted to define the criteria which would apply across all villages and the requirement that these are subject of consultation within the emerging Local Plan Part 2.
024	004	13/03/2017	Francis Jackson Homes	Q05	Settlement boundaries	"Red line" settlement boundaries are overly prescriptive and often all too soon outdated. A criteria based policy - subject to suitable criteria would allow for a site by site assessment to be made so as to take each case on its own merits. Recent appeal decision APP/G2815/W/16/3149683 at Braesby, Glapthorn is a good case in point.
024	005	13/03/2017	Francis Jackson Homes	Q05	Settlement boundaries	However; such a policy cannot be allowed to fall to Neighbourhood Plans to designate as there is no certainty that these will ever progress to be adopted or will plan positively for sustainable growth.
026	001	13/03/2017	G E Reading and Sons	Q05	Settlement boundaries	If settlement boundaries are to be drawn up they should be logical and defensible, and reflect the need for suitable sites to be identified in order to meet sustainable development needs over the plan period. We seek the inclusion of land to the north of at Oundle, Glapthorn Road within any future Oundle settlement boundary.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
026	002	13/03/2017	G E Reading and Sons	Q05	Settlement boundaries	The extension of Oundle in a northward direction will allow for appropriate, sustainable development within the settlement to help meet housing needs identified previously in the RNOTP and/or needs described elsewhere within the Regulation 18 consultation document. The gap between the two settlements can be retained given the extent of land available.
034	018	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q05	Settlement boundaries	HSL agrees with Option A of Q5, which asks whether previous Local Plan “red line” settlement boundaries should be deleted to allow for Neighbourhood Plans to designate their own settlement boundaries.
034	019	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q05	Settlement boundaries	Settlement boundaries are a spatial planning tool used to direct development to the most sustainable locations whilst protecting the character of the countryside, villages and towns and preventing the actual or perceived coalescence of settlements. The NPPG is clear that Local Plans should not restrict circumstances under which settlement boundaries can be used, stating that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by a robust evidence. We have not seen any robust evidence to justify their existence in EN and struggle to see how the LPA can demonstrate that it has planned positively for development in rural areas to date.
034	020	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q05	Settlement boundaries	In removing settlement boundaries from the LPP2, the LPA would still retain control over development within the built-up area and the open countryside; the proposals map can differentiate between the two without the need for “red lines”. This would demonstrate to Neighbourhood Plan Steering Groups that the local planning authority has provided flexibility for settlement lines to be drawn that reflect local housing and infrastructure needs.
034	021	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q05	Settlement boundaries	A criterion based policy should be drafted which is based on the settlement hierarchy and sets out the different forms of development that will be considered for each tier of settlement.
035	005	13/03/2017	Blatherwycke Estate	Q05	Settlement boundaries	Whichever approach is pursued within the Local Plan, policy should enable development that is sustainable to come forward without delay irrespective of its location in relation to settlement boundaries. Section 3 of the NPPF ‘Supporting a prosperous rural economy’ recognises the importance of supporting economic growth within rural areas to create jobs and prosperity by taking a positive approach to sustainable new development for a range of uses and activities.

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035	006	13/03/2017	Blatherwycke Estate	Q05	Settlement boundaries	This foundation is built upon within the Housing White Paper, February 2017 recognises the importance of allowing rural communities to grow and thrive.
037	015	13/03/2017	Catesby Estates	Q05	Settlement boundaries	Section 10 of the consultation document proposes that the Local Plan Part 2 will not allocate any land to meet the residual 220 dwelling requirement for the rural area. The Local Plan Part 2 will fail to meet the District's needs (contrary to paragraph 47 of the NPPF) if it does not allocate sufficient sites to deliver its outstanding needs. Leaving delivery to small windfall sites provides no certainty that the residual requirement will be met. Such a strategy will also fail to deliver any affordable housing due to Government policy on contributions from schemes comprising fewer than ten units.
037	016	13/03/2017	Catesby Estates	Q05	Settlement boundaries	In reviewing the settlement hierarchy the Local Plan Part 2 should seek to allocate sustainable sites in the rural area to meet this residual need, plus contingency sites should any of the existing Development Plan allocations fail to deliver (which we discuss further in response to Question 32). In order to allocate sites it will be necessary to review the boundaries of the most sustainable settlements in the rural area.
037	017	13/03/2017	Catesby Estates	Q05	Settlement boundaries	Planning Practice Guidance is clear that assessing housing need and allocating sites in the rural area should be considered through the Local Plan process (paragraph: 001 Ref ID: 50-001-20160519). To support rural communities, the Housing White Paper proposes that policies in Plans should allow a good mix of sites to come forward for development, so that there is choice for consumers and places can grow in ways that are sustainable.
037	018	13/03/2017	Catesby Estates	Q05	Settlement boundaries	It is proposed that Catesby's site on land to the west of Tollbar Road, Islip should be identified as a residential allocation for up to 80 homes. Islip is a sustainable location which should be identified as a higher tier settlement within the hierarchy.
038	011	13/03/2017	Davidsons Developments Ltd	Q05	Settlement boundaries	The use of settlement boundaries helps inform where development should be located. It is impractical to expect settlement boundaries to be amended and fixed for a period of circa 12 years to accommodate the districts' growth for the plan period. Notwithstanding this, settlement boundaries provides help and guidance to both developers and residents as to where development should be located.



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038	012	13/03/2017	Davidsons Developments Ltd	Q05	Settlement boundaries	Where possible, the preferred approach for distinguishing between the built-up areas and the surrounding rural hinterland would be the use of development boundaries, however it is important to ensure that sufficient flexibility is built in to the Plan to ensure that the districts' development requirements can be accommodated including testing of a higher level of growth to that in Table 5 of the NNJCS. The use of a criteria-based approach, particularly for villages, in addition to a comprehensive review of previous settlement boundaries, including the designation of new boundaries is considered the most practical approach.
040	001	13/03/2017	Dr Charles Lane	Q05	Settlement boundaries	Whatever approach is taken to settlement boundaries in the Local Plan Part 2 (be this a review of settlement boundaries, creating new settlement boundaries, or creating a criteria based policy) it is essential that settlement boundaries, and indeed proposed allocations, are not made on the basis of the Parish administrative boundaries.
040	002	13/03/2017	Dr Charles Lane	Q05	Settlement boundaries	If settlement boundaries, and new allocations are made on the basis of Parish boundaries only, there is a real risk that sustainable sites, which are deliverable, available, and could bring forward real benefits to the community, could be overlooked.
042	001	13/03/2017	Northamptonshire County Council (Property)	Q05	Settlement boundaries	If settlement boundaries are to be drawn up they should: - be logical and defensible, reflecting current physical features and land-use characteristics; and - reflect the need for suitable sites to be identified in order to meet sustainable development needs over the plan period.
043	003	13/03/2017	LXB 3	Q05	Settlement boundaries	To provide certainty and clarity for future development coming forward in the district, we consider that a comprehensive review of previous settlement boundaries (option b) should be pursued. This is especially relevant to sites which are in close proximity to the existing boundaries of the larger urban settlements, the development of which can help to meet the requirements of the plan.
007	006	01/03/2017	Higham Ferrers Town Council	Q06	Historic and Built Environment	Designate locally listed heritage assets through the Local Plan Part 2, but also allow Neighbourhood Plans to supplement the list should they be produced after the Local Plan Part 2
010	005	01/03/2017	Stanwick Parish Council	Q06	Historic and Built Environment	option a

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
017	015	10/03/2017	Gladman Developments Ltd	Q06	Historic and Built Environment	Gladman notes the recognition that is given to the distinctions between designated and nondesignated heritage assets within the consultation document and the references to the JCS. Any policy approach that is taken forward through the Local Plan Part 2 should fully reflect the distinctions between different heritage assets in the context of the Framework. In particular the different balancing exercises that a local authority must undertake when assessing planning applications that affect such assets. Paragraphs 133 to 135 of the Framework are of particular relevance
017	016	10/03/2017	Gladman Developments Ltd	Q06	Historic and Built Environment	if the Part 2 Local Plan seeks to introduce an approach for identifying further non-designated heritage assets by way of local heritage listing, it should be done so in the context of a clear and consistent set of criteria and suitably robust supporting evidence. By taking this approach, it will make it possible for future applicants to understand the relevance of any such asset in the preparation of development proposals and decision makers in the balanced consideration of them as required by paragraph 135 of the Framework.
018	008	10/03/2017	National Trust	Q06	Historic and Built Environment	Either of the approaches contained in question 6 could be adopted. However, it may be preferable if the local plan contained a policy referring to locally listed assets and providing enhanced protection. A separate list could then potentially be compiled, maintained and cyclically updated through a rigorous system of assessment. See, for example Bristol City Council: <a href="https://www.bristol.gov.uk/planning-and-building-regulations/local-list-of-valued-buildings">https://www.bristol.gov.uk/planning-and-building-regulations/local-list-of-valued-buildings</a>
020	009	13/03/2017	Historic England	Q06	Historic and Built Environment	Historic England's recently published Advice Note 7, Local Heritage Listing, will be of particular relevance in this instance:- <a href="https://historicengland.org.uk/listing/what-is-designation/local/local-designations/">https://historicengland.org.uk/listing/what-is-designation/local/local-designations/</a>
020	010	13/03/2017	Historic England	Q06	Historic and Built Environment	Either option would be acceptable, providing that a specific policy was also included within the Local Plan Part 2 to ensure adequate strength and weight would be afforded; I would be very happy to assist with wording if required. The NPPF within paragraph 169 states that local planning authorities should have up-to-date evidence about the historic environment to use to assess the significance of heritage assets and the contribution they make to their environment.
020	011	13/03/2017	Historic England	Q06	Historic and Built Environment	Heritage assets are not only those designated under statutory regimes, but those that may be recognised by the planning authority as having heritage significance. Paragraph 135 of the NPPF states that such assets can merit consideration in planning matters, with the authority taking a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.

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020	012	13/03/2017	Historic England	Q06	Historic and Built Environment	If Option A is taken, there should be an allowance for updating of the local list during the Plan period; as such option B may allow greater flexibility, reflecting Advice Note 7 above.
021	013	13/03/2017	John Martin Associates	Q06	Historic and Built Environment	The matters of historic and built environment are adequately covered by JCS Policy 2 and relevant paragraphs of the NPPF in particular 131-135 without need for extensive additional policy reference in the Part 2 Local Plan
031	001	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	The JCS sees Local Lists as a way of Councils identifying non-designated assets and giving them equal and consistent weighting.
031	002	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	I appreciate that this is an attempt to provide protection to non- designated assets which are valued locally and provide a sense of place to the local community. The type of non-designated assets can vary from buildings through to below ground archaeological site through to landscapes including those that contain surviving medieval ridge and furrow.
031	003	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	This diversity is representative of the intrinsic interest that is contained within the historic environment as a whole but it also highlights the difficulty in identifying all the components to be put in a Local List. The County Historic Environment contains all the known historic assets within the County including the designated and the undesignated which is what this policy is concerned with.
031	004	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	The creation of a Local List would be potentially resource heavy especially with regard to officer time in the first instance to trawl the HER for information related to the specific village or District level. The information from the HER would be need to be added to by a local/ District consultation as not all the publically appreciated nominations for the list would be in the HER. The proposed list would need to be discussed and arbitrated to ensure consistency.
031	005	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	Once a list was produced it would have to be updated on a regular base. There would also be the issue of the status of those assets left off the list and new sites.
031	006	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	I would suggest that the protection of non-designated assets is predominately provided within the NPPF in the first instance. The production of Neighbourhood Plans allows areas of locally valued landscape or buildings to be highlighted in a more manageable way.
031	007	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	In conclusion I'm not sure how valuable or indeed helpful it would be to have an SPD for individual non-designated assets unless you had a specific area with multiple non-designated assets i.e. forming a landscape : deserted medieval village plus open fields system (ridge and furrow)

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031	008	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q06	Historic and Built Environment	Policy 2 of the JCS provides in conjunction with the NPPF a way of managing and enhancing the historic environment. In an ideal world if resources were available an assessment could be made of all the non-designated assets within the District however in reality it might be better if the production of Local List was undertaken in the identified growth areas rather than in the District as a whole.
040	003	13/03/2017	Dr Charles Lane	Q06	Historic and Built Environment	Any approach to non-designated heritage assets should remain flexible enough to ensure that sensitively designed schemes, which may often involve a change of use of the building from its original purpose or the provision of some new build development to support an asset, can be brought forward to ensure the future and longevity of the building.
040	004	13/03/2017	Dr Charles Lane	Q06	Historic and Built Environment	East Northamptonshire is fortunate to have numerous buildings of local architectural or historic interest. However, in ensuring that these buildings continue to exist, a flexible approach as described above is required.
007	007	01/03/2017	Higham Ferrers Town Council	Q07	Town Centre Regeneration	Areas in Higham Ferrers should be included for receneration eg increased car parking provision, Highways and Transport Improvements as highlighted in Neighbourhood Plan, and Community Plan. The Bury Close Industrial Estate should be considered for regeneration
020	013	13/03/2017	Historic England	Q07	Town Centre Regeneration	The inclusion of the Library and Cattle Market sites at Thrapston are strongly welcomed, The redevelopment of the Cattle Market site in Thrapston potentially has a great deal to recommend it if can be well related to the existing centre and preserve the character and appearance of the conservation area. I would refer you to our previous response to the Sainsbury's application at the site for greater detail.
020	014	13/03/2017	Historic England	Q08	Re-using rural buildings/ redevelopment in the open countryside	The historic environment should continue to be included within the policies, as currently reflected within RNOTP policy 23 and LP Policy AG9. An additional criteria to reflect NPPF terminology in relation to heritage assets would be beneficial.
021	014	13/03/2017	John Martin Associates	Q08	Re-using rural buildings/ redevelopment in the open countryside	The criteria set out in RNOT Policy 23 & 24 are considered to be NPPF compliant in that neither extant policy restricts the ability for the re-use of rural buildings or new dwellings in the countryside subject to appropriate criteria which reflects JCS Policy 13(2) and NPPF (28 & 55). It is therefore considered that there is no requirement to introduce any additional criteria which is likely to unnecessarily constrain the opportunity for such re-use of buildings to be realised.

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006	001	09/02/2017	Sport England	Q09	Evidence base - Playing Pitch and Open Space Strategy	Sport England supports the reference to the Playing Pitch and Open Space Strategy referenced in Para 9.3 but we do not understand the reasoning for the two questions posed in Q9. The two questions do not appear to follow the statement at the end of paragraph 9.3. Is the KKP assessment already a review with priorities identified?
006	003	09/02/2017	Sport England	Q09	Evidence base	Sport England is concerned that the PMP Open space study 2006, which includes built sports facilities is now significantly out of date. It is not clear therefore how this evidence meets the requirements of paragraph 73 of NPPF or paragraph 70 with regard to positive planning.
007	008	01/03/2017	Higham Ferrers Town Council	Q09	Open space and green infrastructure	Review existing, and designate new, open space, sport and recreation sites, with reference to the KKP assessment
010	006	01/03/2017	Stanwick Parish Council	Q09	Open space and green infrastructure	option a
017	017	10/03/2017	Gladman Developments Ltd	Q09	Open space and green infrastructure	The Part 2 Local Plan should identify open space, sport and recreation sites and provide an appropriate level of protection to them where this has been supported by up-to-date and robust evidence. A criteria based development management policy would then be required against which any future development proposals could then be assessed, setting out exceptions whereby safeguarded sites could be released for development.
023	001	13/03/2017	Ferrers School	Q09	Open space and green infrastructure	Sports Pitch Provision - In the summer of 2015 The Ferrers School made a decision to install a 3G FIFA1 artificial pitch. The decision was made following consultation with local football clubs regarding their potential need / use of this facility more locally that they were currently using in the evenings together with meeting the criteria for curriculum need for all weather facilities within the school day.
023	002	13/03/2017	Ferrers School	Q09	Open space and green infrastructure	Currently we have 50 hours per week being used by community groups with 76 hours per week still available for the community to access. Only 10 hours are currently used Saturday/ Sunday leaving a further 62 hours available. Information of how to do this is on our school website.
023	003	13/03/2017	Ferrers School	Q09	Open space and green infrastructure	If a further 3G pitch was installed locally we believe it would have a detrimental impact upon our pitch being used by the community along with the 3G pitch in Raunds.
031	009	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q09	Open space and green infrastructure	The approach to this should also be mindful of the Historic Environment

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	022	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q09	Open space and green infrastructure	A hybrid of Option A and B is the preferred approach. The LPP2 should review existing, and designate new, open space, sport and recreation sites, with reference to the KKP assessment.
034	023	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q09	Open space and green infrastructure	It should also set out a criteria based approach to ensure flexibility and to guide future Neighbourhood Plans.
038	013	13/03/2017	Davidsons Developments Ltd	Q09	Open space and green infrastructure	The protection or creation of open space and green infrastructure needs to be based on a qualitative and quantitative study of the existing open space and green infrastructure. This evidence needs to be used to inform the level of open space and green infrastructure that is designated.
038	014	13/03/2017	Davidsons Developments Ltd	Q09	Open space and green infrastructure	Sufficient flexibility needs to be included within the Local Plan Part 2 to allow poor quality open space and green infrastructure to be replaced with better quality facilities and infrastructure. New open space, sports and recreation sites need to address and identified need rather than a quantitative requirement, thus ensuring land is used efficiently.
043	004	13/03/2017	LXB 3	Q09	Open space and green infrastructure	To ensure that the district's open spaces and sports and recreation spaces are protected without constraining future growth, we consider that a review of open space, sport and recreation sites should be undertaken as part of the preparation of the Local Plan Part 2. Any future review should be based on relevant and up-to-date evidence.
045	004	13/03/2017	Natural England	Q09	Open space and green infrastructure	Natural advises where the KKP assessment identifies existing and new sites for open space, sport and recreation these should be highlighted on the proposals map and it would also be useful to have a development management policy which protects these sites.
007	009	01/03/2017	Higham Ferrers Town Council	Q10	Local Green Space	This policy needs a mixed approach as not all areas will proceed to Neighbourhood Plans. i.e. designate Local Green Space through the Local Plan Part 2 but allow for further areas to be designated in Neighbourhood Plans made after the Local Plan Part 2.
008	001	20/02/2017	Anglian Water	Q10	Local Green Space	Reference is made to local green spaces being included in the Part 2 Local Plan or in neighbourhood plans. We have no objection to the inclusion of local green spaces in the Part 2 Local Plan or Neighbourhood Plans. However there is a need to ensure that any proposed designations do not prejudice the continued operation of Anglian Water's assets by preventing improvements being made to support development within the district.
010	007	01/03/2017	Stanwick Parish Council	Q10	Local Green Space	option a

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
011	004	09/03/2017	Persimmon Homes Midlands	Q10	Local Green Space	Option b) would be the most appropriate given the designation is supposed to be used to protect only those areas of 'particular importance to local communities'. The Neighbourhood Planning process is therefore the most appropriate way for such areas to be agreed upon.
017	018	10/03/2017	Gladman Developments Ltd	Q10	Local Green Space	Local Green Space is a restrictive policy approach and should therefore only be afforded to green areas or open space in very special circumstances. The Part 2 Local Plan (or any neighbourhood Plan) must therefore be accompanied by compelling evidence that any proposed Local Green Space designations meet the requirements contained in paragraphs 76 to 78 of the Framework. The Planning Practice Guidance (PPG) provides further guidance on Local Green Space designations.
018	009	10/03/2017	National Trust	Q10	Local Green Space	Option A is preferable, ensuring that the Council gives consideration to green space across the district that may meet the requirements of Local Green Space. This does not preclude against Neighbourhood Plans designating further Local Green Spaces. However, there is no certainty that coverage of the district by Neighbourhood Plans will ever be comprehensive.
028	001	13/03/2017	Northamptonshire County Council (NIA)	Q10	Local Green Space	In my view option b affords greater flexibility over the life of the LPP2. Option a would render the Local Plan out of date with the publication of any new Neighbourhood Plan which designated Local Green Space.
031	010	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q10	Local Green Space	Again this should also involve a consideration of the impact on the Historic Environment which has the potential to be beneficial.
034	024	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q10	Local Green Space	Option B is the preferred approach. The designation of local green spaces is of particular local importance and should be determined locally through Neighbourhood Plans. A criterion based approach should be adopted that reflects national policy and the guidance set out in the NNJCS.
038	015	13/03/2017	Davidsons Developments Ltd	Q10	Local Green Space	The protection of Local Green Space is vital to ensuring successful place making. Green space could be designated through the Local Plan Part 2 as well as through emerging Neighbourhood Plans. We therefore support an approach which allows designation of Local Green Space within both documents. It is however important to identify clear criteria to ensure that the most appropriate land is protected rather than the policy being used to stop development and for engagement to the place with affected landowners.
043	005	13/03/2017	LXB 3	Q10	Local Green Space	We consider that Local Green Space should be designated through the Local Plan Part 2. The designation of Local Green Space should be based on proportionate, up-to-date and relevant evidence.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
045	005	13/03/2017	Natural England	Q10	Local Green Space	As above existing green space should be protected and identified on the proposals map. Where the council are aware of potential new areas which could be designated this could also be allocated by the part 2 plan, but setting out detailed criteria would also be useful as Neighbourhood Plans or other proposals come forward over the plan period, to ensure consistency. Natural England considers the incorporation of high quality, sustainable and multifunctional greenspace within built development can provide a range of economic, environmental and social benefits and is fundamental to the creation of sustainable communities and the health and well-being of residents.
007	010	01/03/2017	Higham Ferrers Town Council	Q11	Green Infrastructure	New Development should contribute towards and facilitate access to the Green Infrastructure network. Review the relevant policies in RNOTP and consider other opportunities in areas not cover by the RNOTP.
010	008	01/03/2017	Stanwick Parish Council	Q11	Green Infrastructure	Does not appear to offer sufficient options for the Four Towns areas
018	010	10/03/2017	National Trust	Q11	Green Infrastructure	Option A – a review of site specific green infrastructure proposals would be preferable. Through review of the Green Infrastructure Delivery Plan and other work referenced at 9.10 it may be possible to identify additional sites and corridors that would benefit from policy support.
028	002	13/03/2017	Northamptonshire County Council (NIA)	Q11	Green Infrastructure	The role of the LPP2 is to refine JCS policies for relevant and meaningful interpretation at the local level. Green infrastructure (GI) is one area in which it is possible for an LPP2 to incorporate a high degree of local distinctiveness. Neither option a nor b has the potential of option c to improve local distinctiveness.
028	003	13/03/2017	Northamptonshire County Council (NIA)	Q11	Green Infrastructure	The GI corridors listed in Policy 4 of the RNOTP (option a) are focused on Rights of Way and do not necessarily incorporate the multifunctionality expected of a GI network.
028	004	13/03/2017	Northamptonshire County Council (NIA)	Q11	Green Infrastructure	The local corridors identified in the Joint Core Strategy (option b) were described in 2006 and might not now be the most appropriate. According to paragraph 158 of the NPPF 'local plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area'. Evidence for a local GI policy should include an analysis of existing resources and how these might be incorporated, enhanced and connected.



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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
028	005	13/03/2017	Northamptonshire County Council (NIA)	Q11	Green Infrastructure	I suggest that the Council consider updated GI planning resources recently developed by this office. The work identified within each 1km OS grid square in the county, known GI assets across five themes: access, biodiversity, historic environment, landscape and open space. Each theme was analysed individually and then collectively to identify concentrations of multifunctionality (see examples in Figures 1 and 2 appended below). Such work serves to refine older studies and provides a more up-to-date evidence base in line with the NPPF.
028	006	13/03/2017	Northamptonshire County Council (NIA)	Q11	Green Infrastructure	This recent work provides an overview of known GI assets on the ground irrespective of the aspirations which formed the 2006 study or RNOTP Policy 4. As a result it suggests somewhat different local GI corridors. The work allows planning authorities to identify where in the district are key concentrations of assets and how those relate to the identified local and sub-regional corridors. It can therefore help local authorities determine where new assets will complement existing GI, whether local corridors should be amended to account for the distribution of assets and if not, where in those corridors investment might best be spent.
031	011	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q11	Green Infrastructure	JCS Policies 19-21 mention protecting or enhancing heritage interests but this seems in reality to be rather low down in the pecking order when it comes to initial discussions regarding green infrastructure. Green Infrastructure is not just biodiversity and I would like the Local Plan part to reflect this.
034	025	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q11	Green Infrastructure	Option B is the preferred approach. The NNJCS policies provide sufficient direction for the effective implementation of green infrastructure projects. Further opportunities to create local green infrastructure corridors may be defined through Neighbourhood Plans / individual sites in accordance with the available evidence base. This approach will allow flexibility in the plan and ensure it does not become quickly out of date.
036	004	13/03/2017	Society of Merchant Venturers	Q11	Green Infrastructure	The SMV's land lies immediately adjacent to the 'Thrapston Gravel Pits' designated as part of the Upper Nene Valley Gravel Pits 'Special Protection Area' (SPA). The development of our client's land provides an opportunity to enhance (and improve access to) the green infrastructure corridor (disused railway) which runs along the northern boundary of the site.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
036	005	13/03/2017	Society of Merchant Venturers	Q11	Green Infrastructure	Furthermore, in accordance with Policy 4 of the JCS, any residential development in this location could contribute towards implementation of the 'Mitigation Strategy' for the SPA. This includes measures such as: improvement of existing greenspace and recreational routes and/or providing alternative greenspace or recreational routes. Indeed, the SMV's extensive landholdings provides an opportunity to deliver improvements across a wider area.
043	006	13/03/2017	LXB 3	Q11	Green Infrastructure	We consider that the spatial strategy and policies contained within the JCS provide sufficient direction for the effective implementation of green infrastructure policies (option b).
045	006	13/03/2017	Natural England	Q11	Green Infrastructure	We understand the evidence base for Green Infrastructure will be updated as part of the emerging part 2 plan. Our advice on this is the same as Q10. It is important that housing growth is supported by adequate provision of green infrastructure, especially when it helps mitigate for impacts on nationally or European designated sites.
032	005	13/03/2017	Environment Agency	Q11, Q12, Q13, Q25	Water resources	These have a common thread and it would be useful to link them to opportunities for river restoration. In order to ensure that improvements to wastewater treatment are not compromised by development proposals, we believe that it is important that new development ensures no deterioration to the morphology of urban water bodies and contributes to river restoration.
005	001	07/02/2017	Northamptonshire County Council (LLFA)	Q12	Ecosystem services (trees)	We very much welcome the concept set out in section 9.13 regarding the wide range of benefits that trees may offer. However because the Core Strategy already includes extensive policy direction regarding the vast range of functions of trees; i.e. landscape (Policy 3), biodiversity (Policy 4), flood risk management (Policy 5), public open space (Policy 7), place shaping (Policy 8), green infrastructure (policies 19 and 20) and site specific allocations (policies 27, 33 and 35), it is not considered necessary to include an additional policy relating to this matter.
010	009	01/03/2017	Stanwick Parish Council	Q12	Trees and ecosystem services	option a
021	015	13/03/2017	John Martin Associates	Q12	Ecosystem services (trees)	The matters of biodiversity and geodiversity are adequately covered by JCS Policy 4 and relevant paragraphs of the NPPF in particular 117 &-118 without need for extensive additional policy reference in the Part 2 Local Plan

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
028	007	13/03/2017	Northamptonshire County Council (NIA)	Q12	Ecosystem services (trees)	Of the two approaches suggested option b is the most scientifically valid; I do not think that ecosystem services could be enhanced simply through tree protection. The University of Northampton has done a great deal of work on ecosystem services in Northamptonshire. I believe their work would be an excellent starting point for identifying a) ecosystem services of interest for the planning process, b) areas of supply of those ecosystem services and c) areas of demand for those services. These three factors could be used to identify priority areas for multiple services and I believe would be the best approach.
034	026	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q12	Ecosystem services (trees)	The NNJCS sets out the strategic guidance and policy. Option A is supported in that the protection of valued trees should be through development management policies and individual planning applications.
043	007	13/03/2017	LXB 3	Q12	Ecosystem services (trees)	We consider that option a) should be pursued. The JCS sets out various policies for ensuring the district's biodiversity and natural environment is preserved.
045	007	13/03/2017	Natural England	Q12	Ecosystem services (trees)	We advise a combination of the suggested approaches, whereby valued trees are protected, and areas can be identified where new planting can be implemented. This will enable more detailed and local knowledge to be incorporated within the plan. For example identifying additional corridors where there can be increased tree and hedgerow planting in the Rockingham Forest area. Policy 21 Rockingham Forest within the NNJCS has overarching policies for planting of woodland, increasing biodiversity linkages and green infrastructure corridors and protection and enhancement of the existing forest, which we support.
045	008	13/03/2017	Natural England	Q12	Ecosystem services (trees)	The part 2 plan could go one step further by identifying where there are extensive gaps and having a local policy, which specifies the types of species and habitats which are native to the area, or declining and we would wish to see supported. For example planting of Blackthorn, and hedgerow management creating south facing scalloped edges provides excellent habitat for the Black Hairstreak butterfly, which Natural England would welcome in this area. Green corridors, hedgerow and woodland planting will also provide suitable habitats for bats.
045	009	13/03/2017	Natural England	Q12	Ecosystem services (trees)	The proposals map could also identify areas of biodiversity action plan (BAP)/ Priority Habitat (PH). This not only assists in avoiding negative impacts when planning allocation areas, but also highlights where existing habitats are located and how they may be enhanced further by additional connectivity.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
007	011	01/03/2017	Higham Ferrers Town Council	Q13	Landscape Designations	Designation of areas to prevent coalescence of settlement
010	010	01/03/2017	Stanwick Parish Council	Q13	Landscape Designations	option a
011	005	09/03/2017	Persimmon Homes Midlands	Q13	Landscape Designations	In considering any additional landscape designations in this plan, the Council should be mindful of NPPF Paragraph 113 which states that, 'distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status'. Making additional landscape designations should not rule out development all together. The Council should also be mindful that identifying large areas of land with landscape designations can be counter-productive as this approach tends to dilute their significance.
017	019	10/03/2017	Gladman Developments Ltd	Q13	Landscape Designations	Any landscape designation should be supported by robust evidence to demonstrate the relevance of, and necessity for, the level of protection that is being sought through the local plan.
017	020	10/03/2017	Gladman Developments Ltd	Q13	Landscape Designations	Gladman would be opposed to the use of any landscape designations (such as areas of separation, areas of tranquillity or further landscape character areas) unless they are fully justified through evidence, including an up-to-date landscape character assessment. Any policy mechanism of this nature should include suitably flexible and permissive criteria to ensure that it does not ultimately serve as a tool to prevent sustainable forms of development from coming forward. In this regard we submit that new development can often be located within locations with landscape designations of this nature and not lead to the physical or visual merging of settlements, erosion of the sense of separation between them or a loss of openness and/or character.
018	011	10/03/2017	National Trust	Q13	Landscape Designations	c) Lyveden New Bield is a very special historic landscape set within an extensive rural setting. Whilst current Historic England guidance does not support the identification of a bounded setting, there would nevertheless be merit to a local plan policy highlighting and protecting the landscape setting of Lyveden. See for example South Kesteven Site Allocations and Development Management Policy SAP11: <a href="http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=14107&amp;p=0">http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=14107&amp;p=0</a>
020	015	13/03/2017	Historic England	Q13	Landscape Designations	Historic landscape character assessments and Conservation Area appraisals and management plans could also be used, and to inform the evidence base.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
020	025	13/03/2017	Historic England	Q13	Landscape Designations	Additionally, the part 2 Local Plan provides a valuable opportunity to include a specific single policy to ensure the protection of the significance and setting of heritage assets at Ashton village Conservation Area and the potential Conservation Area at Ashton Wold (which together encompass the historic Rothschild estate), the listed buildings in both locations and the landscape designations at Ashton Wold, which include the Registered PAG, the SSSI and the National Trust covenanted land, which together form a unique model conservation estate. I would be very happy to advise further on wording.
021	016	13/03/2017	John Martin Associates	Q13	Landscape Designations	This matter is adequately covered by JCS Policy 3 and relevant paragraphs of the NPPF in particular 109 without need for additional extensive policy reference in the Part 2 Local Plan.
031	012	13/03/2017	Norhtamptonshire County Council (Archaeology)	Q13	Landscape Designations	The importance of historic landscapes needs to be considered especially the remains of medieval cultivation i.e. ridge and furrow which is best appreciated as a landscape.
034	027	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q13	Landscape Designations	National policy and the strategic landscape policies set out in the NNJCS provide sufficient policy protection. There is therefore no need for the LPP2 to make additional designations.
038	016	13/03/2017	Davidsons Developments Ltd	Q13	Landscape Designations	Figure 13 'Landscape Character Types' identifies types based on the Northamptonshire Landscape Character Assessment (LCA). The LCA is to be used in the determination of development proposals. It is suggested that Figure 13 and the LCA is referred to in the Local Plan Part 2 but it is not suggested that further designations, including areas of tranquillity, are identified in the District. Any landscape designations need to be carefully considered to ensure that there is a justified and beneficial need for protecting land through designation. Where designations are proposed, it is important that these are properly consulted on.
040	005	13/03/2017	Dr Charles Lane	Q13	Landscape Designations	If the Council decides it is right to 'designate areas to prevent coalescence of settlements', this should only be done if it is supported by robust evidence. Blanket policies restricting housing development should be prevented.
040	006	13/03/2017	Dr Charles Lane	Q13	Landscape Designations	If an evidence based approach is undertaken, this should consider individual parcels of land, and the contribution those parcels of land make to the separation of settlements; it should not be a wash over of all land between settlements. There are some parcels of land, such as land to the north of Oundle, adjacent to Oundle C of E Primary School, which although on the edge of a settlement, have strong and well defined boundaries, relating well to the existing settlement; the development of which would be well contained with no impact on the separation of settlements.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
040	007	13/03/2017	Dr Charles Lane	Q13	Landscape Designations	If the Council decides it is right to 'designate areas to prevent coalescence of settlements', this should only be done if it is supported by robust evidence. Blanket policies restricting housing development should be prevented.
040	008	13/03/2017	Dr Charles Lane	Q13	Landscape Designations	If an evidence based approach is undertaken, this should consider individual parcels of land, and the contribution those parcels of land make to the separation of settlements; it should not be a wash over of all land between settlements. There are some parcels of land, such as land to the north of Oundle, adjacent to Oundle C of E Primary School, which although on the edge of a settlement, have strong and well defined boundaries, relating well to the existing settlement; the development of which would be well contained with no impact on the separation of settlements.
040	009	13/03/2017	Dr Charles Lane	Q13	Landscape Designations	As detailed in previous representations development of the land immediately adjacent to Oundle Church of England Primary School will not impact the coalescence of the settlements; the site is a considerable distance from the built edge of Glapthorn, in excess of 900 metres as the 'crow flies'. Whilst a considerable distance from Glapthorn, it is also important to note, that owing to the sites location off Cottestock Road, there is no interrelationship between the site and Glapthorn, other than the Parish administrative boundary. Furthermore, the site is contained by extensive maturing planting. It would be wholly wrong to 'blanket' designate all land between Glapthorn and Oundle.
043	008	13/03/2017	LXB 3	Q13	Landscape Designations	We consider that the designation of further landscape areas is not necessary if appropriate settlement boundaries are set and provision made for safeguarded land through the Local Plan Part 2.
045	010	13/03/2017	Natural England	Q13	Landscape Designations	Your plan could refer to the National Character Areas which divide England into 159 natural areas, each defined by a unique combination of landscape, biodiversity, geodiversity and economic and cultural activity.
045	011	13/03/2017	Natural England	Q13	Landscape Designations	The new NCA profiles provide an integrated, locally specific evidence base that can be used for making decisions about the natural environment. The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. Reference should be made to the National Character Areas East Northamptonshire falls within: NCA Profile: 89 Northamptonshire Vales and NCA Profile: 92 Rockingham Forest.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
002	001	26/01/2017	Melchbourne & Yelden Parish Council	Q14	Chelveston Renewable Energy Park - Factual correction/information	<p>Thank you for your email &amp; for the information.</p> <p>I have just had a quick look at the adopted Wind &amp; Solar Energy SPD and note that you describe the wind turbines at Burton Latimer and the 9 turbines at Chelveston. Please forgive me for being pedantic but, of the 9 turbines at Chelveston, 4 are over the border in Bedfordshire and are under the jurisdiction of Bedford Borough Council.</p> <p>This may seem to be a small matter but I thought this should be mentioned to you as this might lead to confusion although, of course, there has been a great many discussions between the two planning authorities regarding this site over the last few years.</p>
020	016	13/03/2017	Historic England	Q14	Renewable energy	<p>If a policy is to be proposed, a criteria similar to criteria c) of Policy 26 would be recommended to ensure that heritage assets are taken into account. I would be very happy to advise on wording if a further policy is to be proposed.</p>
010	011	01/03/2017	Stanwick Parish Council	Q15	Housing mix and tenure	<p>Local Plan 2 should be able to reflect the housing mix requirements identified in Neighbourhood Plans</p>
011	006	09/03/2017	Persimmon Homes Midlands	Q15	Housing Standards	<p>The Joint Core Strategy already sets a high bar for housing standards, through applying the National Space Standards and National Accessibility Standards at Policy 30. Together these standards already have a significant impact on development viability and the application of any additional standars could have a hugely detrimental effect on the delivery of housing in the district and consequently the ability for the Council to demonstrate a sufficient supply of housing to meet its identified needs. We would urge the Council to give very careful consideration to the financial viability of any additional policies in this plan.</p>
012	011	09/03/2017	Investment Land International	Q15	Housing mix and tenure	<p>It is noted that JCS Policy 30 provides a comprehensive and detailed references to housing size, mix and tenure standards which should be accommodated by housing development and clearly sets out that matters such as housing type and wheelchair accessibility should be reviewed on the basis of need. It is therefore considered important that the Part 2 Local Plan provides a framework for how these matters will be considered and assessed over the course of the plan period.</p>

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
014	001	09/03/2017	East Northamptonshire Council Housing Strategy	Q15	Additional local housing standards	Sub-district requirements – the north and south of the district are very different in character and the differing housing needs are detailed in the ward level housing mix requirement assessments available on the council’s website. These assessments do not however take account of housing demand and aspirations and the potential need to redress the balance between the north and the south of the district, providing more affordable homes for market sale, for low cost home ownership initiatives and for rent in the more rural north of the district and more higher value homes in the more urban south. A study is in progress looking into the housing mix requirements of the district. Exception sites in rural areas should be encouraged to deliver a mixture of affordable and low cost market housing.
014	002	09/03/2017	East Northamptonshire Council Housing Strategy	Q15	Additional local housing standards	Accessibility Standards Procedures need to be put in place to ensure all new dwellings meet the Category 2 National Accessibility Standards as set out in Policy 30 of the Joint Core Strategy
014	003	09/03/2017	East Northamptonshire Council Housing Strategy	Q15	Additional local housing standards	Wheelchair accessible standards – more wheelchair accessible housing is required for our ageing population and for the increasing numbers of people living longer lives with disabilities. There is also a need for more bungalow accommodation for older people and those with restricted mobility but these do not all need to be to full wheelchair standard. Often ground floor or bungalow accommodation with level access shower rooms will be adequate. Such housing is required across both the market and affordable sectors. However, such accommodation will not be provided by the market and unless planning policy insists on a percentage quota it will not be delivered. We would therefore suggest that policy should provide for a minimum percentage of new dwellings to be bungalows and for a minimum percentage to be built to wheelchair standards.
014	004	09/03/2017	East Northamptonshire Council Housing Strategy	Q15	Additional local housing standards	Older person’s accommodation – the final report on the Accommodation and Support Needs of Older People in Northamptonshire is awaited and will provide further detail on the needs of the ageing population for both supported and more independent accommodation suitable for older people. This study should be taken into consideration in the formulation of planning policy to encourage the development of housing for older people which will increase their choices and facilitate downsizing, thereby releasing family housing, and reducing the need to build more. The toolkit which will accompany the study will assist the local authority to establish what is needed for older people in different locations in the district.



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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
014	005	09/03/2017	East Northamptonshire Council Housing Strategy	Q15	Additional local housing standards	Older person's accommodation – The location of supported housing is important to ensure it is accessible, close to amenities and transport links. The provision of supported housing for older people on Rushden East and Deenethorpe Garden Village will need careful consideration, planned for from the outset but not provided until sufficient amenities and transport links are in place, likely to be in the latter stages of these developments. Accommodation for older people is a major priority for the District and a specific development management policy covering older persons accommodation would be beneficial.
017	021	10/03/2017	Gladman Developments Ltd	Q15	Housing mix and tenure	Gladman consider that JCS Policy 30 provides sufficient policy guidance on house size, mix and tenure.
034	040	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q15	Housing mix and tenure	Policy 30 of the NNJCS sets out the overall approach that should be taken in considering the size and tenure of new housing and in encouraging development to meet the needs of specific groups. It is vital that the LPP2 sets out more specific requirements for locations. It should set out detailed policies based on an up to date evidence base regarding: - Specific local requirements to meet local needs and aspirations; - Site allocations to accommodate individual and community custom-build developments; - Affordable housing allocations; - Category 3 wheelchair accessible housing; - Specialised housing
034	041	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q15	Housing mix and tenure	In addition to the above, the LPP2 should also set out detailed policies for the delivery of 'starter homes' and the provision of new build dwellings for the private rented sector, which are both emerging national policy matters.
036	009	13/03/2017	Society of Merchant Venturers	Q15	Housing mix and tenure	We have no specific comment to make in answer to the questions in this section as it is likely that these challenges and opportunities will emerge from further research.
036	010	13/03/2017	Society of Merchant Venturers	Q15	Housing mix and tenure	However, our Client's land at Springfield Farm has the potential to deliver around 250 - 300 dwellings. This scale of development secures an opportunity to provide a suitable housing mix and variety of tenures to meet local needs. On a without prejudice basis, there is potential to provide the following: - Affordable Housing; - Housing for young families; - Specialist housing for the elderly; and - Residential Homes where there is an element of care or Nursing Homes.

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<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
038	017	13/03/2017	Davidsons Developments Ltd	Q15	Housing mix and tenure	Housing requirements need to reflect local requirements. The mix, size and tenure of properties required change over time due to many external factors. Therefore, sufficient flexibility needs to be included within policy to enable the correct housing to be built in the right location. Policy requirements should not be prescriptive.
043	009	13/03/2017	LXB 3	Q15	Housing mix and tenure	We consider that JCS Policy 30 sets sufficiently detailed local housing standards. The policy states that residential developments should reflect an identified housing mix and accord with national space standards and contains provisions relating to accessible and affordable housing.
007	012	01/03/2017	Higham Ferrers Town Council	Q16	Specialist Housing Provision	Provision to develop specialist housing for specific groups, such as older people
012	012	09/03/2017	Investment Land International	Q16	Affordable housing	As above, JCS Policy 30 highlights the strategic importance of delivering affordable and specialist housing schemes. To this regard, it is therefore considered that affordable and specialist housing should be considered and promoted as part of site allocations which can demonstrate deliverability.
014	006	09/03/2017	East Northamptonshire Council Housing Strategy	Q16	Specialist Housing Provision	Affordable housing is generally provided either on relatively small sites or as part of market housing schemes. This prevents the mono tenure developments previously seen on large council estates and means that affordable housing is largely 'tenure blind'. Allocations of large sites for affordable housing would not therefore be desirable although smaller infill sites would be, and may assist with delivery.
014	007	09/03/2017	East Northamptonshire Council Housing Strategy	Q16	Specialist Housing Provision	The Housing White Paper is encouraging the provision of sites for self build and custom build housing and placing a duty on local authorities to make land available. It would therefore be prudent to either allocate specific sites for self/custom-build or to make provision for a percentage of homes on larger sites to provide for this demand. Again, smaller, infill sites could be designated for this purpose.
014	008	09/03/2017	East Northamptonshire Council Housing Strategy	Q16	Specialist Housing Provision	Sites for specialist housing are difficult to find in the right locations, close to amenities and transport links, and it would therefore be beneficial to allocate suitable locations for this purpose. On Rushden East and at Deenethorpe Garden Village, the best locations should be identified at the outset and reserved for future development once suitable amenities have been provided and transport links are in place. The report on the Accommodation and Support Needs of Older People in Northamptonshire currently being produced will provide further detail on the location of accommodation for older people.

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
017	022	10/03/2017	Gladman Developments Ltd	Q16	Affordable housing	The Council should give consideration to its evidence base relating to the need for affordable, specialist housing and custom/self build housing. Where appropriate, policy mechanisms should be introduced to support schemes in coming forward.
021	017	13/03/2017	John Martin Associates	Q16	Specialist Housing Provision	Whilst support can be given to a policy which supports the allocation of affordable or specialist housing such proposals would need to be in coformity with the spatial strategy of the JCS as set out in Policy 13 & 30 and require evidence of local need and/or demand in the local area.
034	042	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q16	Specialist Housing Provision	The evidence behind the JCS currently identifies a significant need for specialist 'older' persons accommodation. In accordance with Policies 11 and 30 of the JCS, the LPP2 must include site specific allocations for affordable and/or specialist housing schemes.
034	043	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q16	Specialist Housing Provision	The LPA must look at higher order settlements and larger sustainable villages to meet the needs of specific groups and assess the opportunities that individual settlements can deliver.
038	018	13/03/2017	Davidsons Developments Ltd	Q16	Specialist Housing Provision	Consideration needs to be given to the preparation of an up to date local assessment applicable to affordable housing provision in the District as envisaged in Policy 30 of the JCS. This needs to be flexible and include mechanism for future review as a 'catch-all'. The proposal of site allocations for affordable or specialist housing would not be appropriate in view of the plan period and the diversity of development from small-scale through to the SUE.
038	019	13/03/2017	Davidsons Developments Ltd	Q16	Specialist Housing Provision	We would not support the allocation of specific sites for specialist housing etc unless there is demonstrable need in that location, there is a willing landowner and evidence of deliverability. Would therefore suggest such uses are treated as windfall sites above the minimum housing requirement and assessed on their merits/need, rather than potentially blight sites that could otherwise contribute towards general housing delivery. This would not preclude specialist uses coming forward on general housing allocations but would ensure housing delivery is maintained overall.
043	010	13/03/2017	LXB 3	Q16	Specialist Housing Provision	Paragraph 50 of the NPPF requires Local Planning Authorities to deliver a wide choice of high quality homes and create sustainable, inclusive and mixed communities. To achieve this, and ensure that the district's objectively assessed needs and aspirations are met, we consider that additional sites should be allocated through Part 2 of the Local Plan for all types of housing. Appropriate evidence for allocating additional sites includes, but is not limited to, an updated Strategic Housing Market Assessment and Land Availability Assessment and Self-build register.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
007	013	01/03/2017	Higham Ferrers Town Council	Q17	Gypsies, travellers and travelling showpeople	The preference is for site to be allocated to meet the current unmet demand
020	017	13/03/2017	Historic England	Q17	Gypsies, travellers and travelling showpeople	Existing policy 31 does not make reference to heritage assets and their settings. A more detailed policy within the Part 2 Plan would provide the opportunity to address this, with the inclusion of a criteria such as:- “the prevention of harm to heritage assets and their settings.”
007	014	01/03/2017	Higham Ferrers Town Council	Q18	Town Centre Boundaries	The Local Plan Part 2 should only undertake further boundary assessment where there is no Neighbourhood Plan made or in the process of being made
043	011	13/03/2017	LXB 3	Q18	Town Centre Boundaries	Paragraph 23 of the NPPF requires Local Planning Authorities to “define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres”. To ensure that the Local Plan Part 2 meets the requirements of the NPPF, and provides greater clarity and certainty for applicants, we consider that an appropriate town centre boundary should be designated for Rushden through the emerging plan.
007	015	01/03/2017	Higham Ferrers Town Council	Q19	Town Centres and retail-managing town centre development	Yes a more detailed "saturation" policy, to avoid an over-concentration of single types of businesses/ uses, should be developed.
039	001	13/03/2017	KFC	Q19	Town centre uses	Whilst policy restrictions directed at maintaining retail health are welcomed, it is essential that restrictions related to health and wellbeing are based on evidence and that it can be shown that any benefit is not outweighed by the adverse impacts that occur when the jobs and facilities provided by main town centre uses are excluded from the most densely-populated and accessible areas.
039	002	13/03/2017	KFC	Q19	Town centre uses	In order to ensure predictable decision-making and useful monitoring, it is also essential that any retail or health-related restrictions comprise clear and specific thresholds (in terms of percentage or number limits over meaningful geographical areas) that are derived directly from the evidence and represent the point at which the clear harms of a particular use outweigh the benefits.
043	012	13/03/2017	LXB 3	Q19	Town centre uses	Policy 12 of the JCS identifies the importance of “adapting and diversifying Wellingborough and Rushden town centres”. We consider that the adoption of a saturation policy or other prescriptive targets for town centre uses would conflict with such objectives and potentially constrain Rushden’s growth.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
007	016	01/03/2017	Higham Ferrers Town Council	Q20	Managing the impacts of main town centre uses beyond the town centres	Yes the Local Plan Part 2 should set local thresholds and these should be set for each of the six town centres.
043	013	13/03/2017	LXB 3	Q20	Retail impact thresholds	As an identified Growth Town, Rushden forms the most sustainable location for development in the district and will be the focus for future investment in the area. We consider that the imposition of a threshold different to that set nationally could act to constrain development and the growth of the town and is therefore inappropriate in the Rushden context.
010	012	01/03/2017	Stanwick Parish Council	Q21	Local Centres	Local centres should be based on towns, with Stanwick and Ringstead excluded. This is due to lack of available space developing a local centre and the existing parking congestion.
012	013	09/03/2017	Investment Land International	Q21	Local Centres	As referenced above, it is considered that Stanwick plays an important role as a provider of services and facilities within the rural area. The proposed designation as a local centre is therefore supported.
017	023	10/03/2017	Gladman Developments Ltd	Q21	Local Centres	Where evidence exists to support the designation of local centres, this should be carefully considered and an appropriate policy mechanism brought forward through Local Plan Part 2. Any such policy should be aimed at supporting and enhancing the vitality and vitality of these localities by giving recognition in planning policy to recognised clusters of retail and community facilities.
007	017	01/03/2017	Higham Ferrers Town Council	Q22	Employment areas	Bury Close employment should be considered for enhancement
011	007	09/03/2017	Persimmon Homes Midlands	Q22	Existing Employment Areas	There should be recognition that not all existing employment areas are worth protecting, as they are inappropriately located and it would be more sustainable for them to be relocated to a more suitable site.
011	008	09/03/2017	Persimmon Homes Midlands	Q22	Existing Employment Areas	Alongside these representations we are submitting 'Call for Sites' information in respect of the Whitworths site on Wellingborough Road in Irthlingborough. This is one example of an employment use that would be more appropriately located on an alternative site, with the existing site being used for residential development.
034	044	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q22	Existing Employment Areas	Para 22 NPPF is clear that the long term protection of sites should be avoided.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
034	045	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q22	Existing Employment Areas	Outside the core higher order urban areas, the NPPF is supportive of creating prosperous rural economies and thereby help support the retention of local services and community facilities in villages such as schools, local shops and the post office.
034	046	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q22	Existing Employment Areas	The LPP2 should not be overly restrictive and must allow for flexibility in the Plan to respond to changes and market circumstances. The employment evidence base is over 10 years old and requires updating in line with current policies and a complete review of employment sites needed.
034	047	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q22	Existing Employment Areas	The LPP2 must set out a criteria based policy in accordance with the NPPF and informed by a robust and credible evidence base.
038	020	13/03/2017	Davidsons Developments Ltd	Q22	Existing Employment Areas	The provision of employment areas will be vital to the success of the district. However, as per Paragraph 22 of the National Planning Policy Framework, planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. This is acknowledged within Policy 22 of the Joint Core Strategy, and should be carried through to the Local Plan Part 2. The evidence base for employment areas should be up-to-date to ensure that they remain deliverable. If there is no prospect of delivery, then alternative uses should be considered. Flexibility must be included within the wording of any relevant policy within the Local Plan Part 2.
038	021	13/03/2017	Davidsons Developments Ltd	Q22	Existing Employment Areas	Our client's Site (Land at Nene Business Park, Irthlingborough) was identified within the 1996 Local Plan Proposals Map as an 'industrial and commercial commitment' due to the extant planning permission at the time. However, it has never been formally allocated for employment purposes within the development plan. The Site should therefore not be defined, or interpreted as being, an existing employment area for the purposes of the Local Plan Part 2. Furthermore, it should not be specifically allocated as an employment area within the new Local Plan Part 2.
037	019	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	Paragraph 22 of the National Planning Policy Framework ('NPPF') advises against the long term protection of sites allocated for employment use where this is no reasonable prospect of a site being used for that purpose, and requires land allocations to be regularly reviewed.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
037	020	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	Paragraph 12.4 of the consultation document confirms that existing employment areas in the District are designated through the adopted Rural North, Oundle and Thrapston Plan ('RNOTP'). The employment area designations identified in the RNOTP are informed by the most recent Employment Land Review for the District, which was completed in September 2006, over 10 years ago. No more up to date review of the District's employment land supply has been undertaken since.
037	021	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	This evidence is clearly out of date and as such the existing employment area designations cannot be considered up to date. With the relevant evidence being over 10 years out of date it is likely some of the existing employment areas designated for protection no longer meet the District's needs and the NNJCS' aspirations to deliver better, high quality jobs. In this scenario the sites which no longer meet the District's needs should not be designated in the emerging Local Plan Part 2 for East Northamptonshire.
037	022	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	Allocations which no longer warrant designation should be replaced elsewhere to ensure that the District maintains a sufficient portfolio of suitable employment land. This approach is consistent with paragraph 8.17 of the NNJCS which establishes that where there is an identified shortfall of land against the employment targets set out in Policy 23 additional sites should be allocated through Part 2 Local Plans.
037	023	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	The Inspector's Report to the NNJCS Examination recognises at paragraph 68 that logistics development is a "clear sectoral strength of the local economy that is expected to make an important contribution to economic growth in the area in the short to medium term". Development of this nature requires strategic sites which provide the necessary infrastructure. Strategic sites therefore provide the best opportunity to maintain the District's employment supply and replenish any reduction in the supply as a result of allocations which are no longer suitable for designation.
037	024	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	The Rushden East Sustainable Urban Extension ('SUE') (NNJCS Policy 33) is expected to deliver at least 2,500 B1 (business) and B2 (general industry) jobs, representing 34% of the District's requirement to create 7,200 new jobs. The Joint Position Statement between the Council, the Joint Planning Unit, and the promoters of the SUE indicates that the delivery figures (both housing and employment) for the site are based on an application being submitted in summer / autumn 2016. No application has been submitted to date and the Council's website suggests it is now more likely to be 'late summer 2017', with consultation in the masterplan in spring 2017.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
037	025	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	We submitted robust evidence to the NNJCS Examination demonstrating that the Rushden East SUE was unlikely to deliver within the timescales anticipated by the Council. It remains to be seen whether the masterplan will be consulted in spring and the application submitted in late summer of this year; however what is clear is that the SUE is already over a year behind schedule. Any further delay is likely to impact the amount of development that can be delivered at the SUE within the current plan period.
037	026	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	The Local Plan Part 2 should therefore also review allocations, as well as existing employment designations, to confirm if there is a sufficient supply of adequate employment sites. The Local Plan Part 2 should also seek to allocate other employment sites should the level of development envisaged for Rushden East SUE not be realised during the current plan period.
037	027	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	Should evidence demonstrate that additional employment land is required in East Northamptonshire as a result of reviewing both existing and allocated sites, which we consider is likely to be the case, then it is proposed that land to the south of Kettering Road (site plan enclosed) would be a suitable strategic employment site to meet any residual requirement.
037	028	13/03/2017	Catesby Estates	Q22-Q23	Employment areas	Paragraph 2.33 of the NNJCS highlights the current issues East Northamptonshire experiences with regard to out-commuting to the larger centres in Wellingborough and Northampton. Paragraph 6.3 therefore seeks a modal shift away from car use to reduce the need to travel. Providing additional employment development in close proximity to one of the District's largest settlements could contribute to encouraging more residents to work and stay within East Northamptonshire and ensuring that it is more self-reliant.
007	018	01/03/2017	Higham Ferrers Town Council	Q23	Further employment land allocations	Yes they should be reviewed
010	013	01/03/2017	Stanwick Parish Council	Q23	Further employment land allocations	A review is not required
034	048	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q23	Employment areas	The NNJCS sets out a strategic framework to deliver circa 7,200 jobs. Whilst it is expected that this could be exceeded, there is still an important role for 'non-strategic' sites (less than 5ha) to meet local needs. The LPp2 should make provision for small employment sites to come forward in some of the larger rural settlements in line with an up to date evidence base or proposed as part of Neighbourhood Plans.



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<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
038	022	13/03/2017	Davidsons Developments Ltd	Q23	Further employment land allocations	It is imperative that current Local Plan employment land allocations are regularly reviewed as required under Paragraph 22 of the National Planning Policy Framework. The preparation of the Local Plan Part 2 should include the gathering of up to date evidence base to ensure that the employment land allocations are “fit for purpose”.
038	023	13/03/2017	Davidsons Developments Ltd	Q23	Further employment land allocations	Our client’s Site (Land at Nene Business Park, Irthlingborough) was identified within the 1996 Local Plan Proposals Map as an ‘industrial and commercial commitment’ due to the extant planning permission at the time. In 2009, planning permission was granted for B1 uses on part of the Site at Nene Business Park. Despite, our client actively marketing the site for commercial/employment uses, the site remains undeveloped. Evidence suggests that the employment use is not commercially deliverable. Furthermore, part of the Site is now consented for an Aldi supermarket (A1 retail) and day nursery. The Site should therefore not be defined, or interpreted as being, an existing employment area for the purposes of the Local Plan Part 2.
043	014	13/03/2017	LXB 3	Q23	Existing Employment Areas	Paragraph 20 of the NPPF states that “to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business”. Accordingly, LPAs should “identify sites for local and inward investment” through their Local Plans. To ensure that the Local Plan Part 2 is effective in achieving this and meeting its objectively assessed needs, we consider it important that employment land allocations are reviewed through the Local Plan process. Without such review, sites no longer capable of coming forward for development could be allocated; preventing ENDC from meeting its growth aspirations.
007	019	01/03/2017	Higham Ferrers Town Council	Q24	Culture and Community Facilities	Yes the Local Plan Part 2 should include additional policy direction for tourist related development, including policies to protect for example tourist accommodation.
010	014	01/03/2017	Stanwick Parish Council	Q24	Culture and Community Facilities	No and no
018	012	10/03/2017	National Trust	Q24	Tourism development	National Trust would welcome an approach that is supportive of tourism-related development.
032	002	13/03/2017	Environment Agency	Q24	Tourism development	Waterways and navigation - We find that there is little or no reference to the opportunities that are provided by a navigable river such as the River Nene in any of the documents. There is reference to some green infrastructure projects but no blue infrastructure projects.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
032	003	13/03/2017	Environment Agency	Q24	Tourism development	We recently commissioned the River Nene Waterspace Strategy and it should be available for download on the Nenescape website soon <a href="http://www.nenescape.org">www.nenescape.org</a> , in the interim we can send you an alternative link for immediate download, if required. We believe the strategy provides a comprehensive view of navigable waterways requirements and is a useful up to date evidence base for the local plan.
032	004	13/03/2017	Environment Agency	Q24	Tourism development	Given the multi-faced benefits associated with navigable River Nene across human health, biodiversity, landscape, cultural heritage and the water environment, we believe a separate section in the scoping report will help the local area demonstrate the value waterways has to offer.
034	049	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q24	Tourism development	We note the relaxations under permitted development rights and in NPPF (Para 55) regarding the change of use of existing buildings within rural areas to permanent dwellings and that this may have the potential to undermine the supply of tourist accommodation in the District. The supply of tourist accommodation could be further exacerbated should EN continue to rely on small scale windfall sites to meet its rural housing requirement.
034	050	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q24	Tourism development	The evidence suggests that the supply of tourist accommodation is limited. This has further implications in terms of the rural economy which EN in parts relies upon. Therefore the LPP2 needs to make it clear that tourist accommodation will be protected and the LPA must ensure that windfall sites for residential development limited.
040	010	13/03/2017	Dr Charles Lane	Q24	Tourism development	It is considered that the Local Plan Part 2 should include additional policy direction for tourism related development, e.g. protection of the supply of tourist accommodation. However, as we have stated in other representations made to this consultation, any policy needs to remain flexible. Retaining flexibility will ensure that sensitively designed and unique accommodation can be delivered within East Northamptonshire.
040	011	13/03/2017	Dr Charles Lane	Q24	Tourism development	Such an example includes the Nissen Huts at Ashton Wold, Aston. The redevelopment and conversion of the buildings on this site (Figure 1 below), provides an opportunity to deliver unique and sensitively designed tourism accommodation. Opening such assets to the public and enhancing tourism in the local area.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
043	015	13/03/2017	LXB 3	Q24	Tourism development	Policy 22 of the JCS notes the intention “to support proposals to expand the tourism industry in sustainable ways”. Paragraph 13.4 of the Regulation 18 Consultation Document also states that “previous tourism strategies highlighted the limited tourism accommodation offer within the District compared to potential from the day-visitor market”. Given the stated ambition to enhance the tourism sector and lack of existing facilities, we consider it appropriate for the new Local Plan Part 2 to allocate sites in the district for tourism uses.
003	001	26/01/2017	Apethorpe Parish Meeting	Q25	Apethorpe - community facilities	We have just received notice from your office regarding the East Northants Local plan and we are puzzled about why this has been sent to us and to what it refers. You were very helpful last year when you gave me some helpful pointers about a village hall project. I am probably being dim but I am not sure how this affects us in Apethorpe. I am out of the UK for a considerable period and not able to view the plan. Would you be kind enough to clarify matters, please?
006	002	09/02/2017	Sport England	Q25	Community facilities/ open space	Sport England supports the reference to the Playing Pitch and Open Space Strategy referenced in Para 13.6 and would support specific protection Q25
010	015	01/03/2017	Stanwick Parish Council	Q25	Community Infrastructure	Yes
017	024	10/03/2017	Gladman Developments Ltd	Q25	Community Infrastructure	It is noted that the consultation document includes reference to Policy 7 of the JCS, which seeks to support and enhance community services and facilities. Measures contained within the policy include the creation of new facilities and services where the need arises and the safeguarding of those that already exist.
017	025	10/03/2017	Gladman Developments Ltd	Q25	Community Infrastructure	The availability of local services and facilities is a factor that should be fully explored through the preparation of the Part 2 Local Plan though its proportionate evidence base. This will ensure that the policy choices that are made respond to opportunities to maintain and improve the facilities that are available to local communities across East Northamptonshire in locations that are close to where they live.
034	051	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q25	Community Infrastructure	The LPP2 must allow rural areas to plan for local provision particularly if it is supported by an evidence base and community aspirations/objectives. It is therefore critical that flexibility is provided to allow Neighbourhood Plans address any deficiencies or the necessary protection of local assets.
038	024	13/03/2017	Davidsons Developments Ltd	Q25	Community Infrastructure	A quantitative and qualitative assessment of the community facilities and public open space must be prepared to support any designations, notwithstanding this, high quality community facilities and public open space should be protected where suitable and reasonable to do so.

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<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
043	016	13/03/2017	LXB 3	Q25	Community Infrastructure	Policy 7 of the JCS requires proposals involving the loss of community facilities to demonstrate that they are no longer viable and are not needed by the community in their existing form or as an alternative community use. Proposals involving the loss of open space must also meet a range of similar criteria. We consider that these policy provisions provide sufficient protection to the district's community facilities and public open space.
006	004	09/02/2017	Sport England	Q26	Health and wellbeing	Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a>
007	020	01/03/2017	Higham Ferrers Town Council	Q26	Health and wellbeing	Yes
010	016	01/03/2017	Stanwick Parish Council	Q26	Health and wellbeing	Yes
029	001	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	Yes - The local plan should include a specific health and wellbeing policy which should include reference to health infrastructure but should also be wider in its scope of health and wellbeing. The reason for this suggestion is below. It is the same as our response to question 34 but is included here in our response to Q26 aswell for completeness.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
029	002	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>The Northamptonshire Director of Public Health proposes that a specific health and wellbeing policy should be included in the East Northamptonshire Local Plan Part 2. This should address factors such as:</p> <ul style="list-style-type: none"> <li>- Identifying and securing delivery of appropriate healthcare infrastructure to meet current and future healthcare needs.</li> <li>- Creating places which support the achievement of healthier lifestyles and thus help to prevent ill health.</li> <li>- Incorporate effective processes (such as Health Impact Assessment) to enable robust assessment of the likely health and wellbeing implications of development proposals, in order to enable mitigation of negative health impacts and to take advantage of opportunities to promote good health and wellbeing.</li> </ul>
029	003	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>This is in recognition of:</p> <ul style="list-style-type: none"> <li>- the important role that planning policy and decisions have in shaping the environments in which our communities live, work and play and thus the significant impact that they have on our lifestyle choices and behaviours and thus our physical and mental wellbeing.</li> <li>- The significant health and wellbeing issues being experienced by communities within East Northamptonshire and across the county, and the pressures being faced by local health and social care services.</li> </ul>
029	004	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>It is acknowledged that a wide range of policies within both the North Northants Joint Core Strategy and the East Northamptonshire Local Plan Part 2 could contribute positively to health and wellbeing, such as policies relating to active travel and transport, open space, sport and recreational facilities, local green spaces, green infrastructure, ensuring high quality design etc.</p>
029	005	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>It is also pleasing that health and wellbeing issues are specifically identified in the consultation document in paragraphs 13.7 and 13.8. However question 26 in the consultation document appears to focus on the provision of healthcare infrastructure (i.e. buildings from which healthcare services will be provided).</p>
029	006	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>While this is important and should indeed be addressed within the Local Plan Part 2, it takes a very narrow view of the role of planning in achieving health and wellbeing.</p>
029	007	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>Health is determined by genetics, age and lifestyle, but also by the environments in which people live and work. If we are to improve the quality of life for our communities and reduce the current unsustainable demand for health services, we need to plan for healthy developments and better living environments which enable people to make healthier lifestyle choices.</p>

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
029	008	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	Therefore wider health and wellbeing considerations (in addition to buildings/ facilities for health services) should be clearly and explicitly identified in the Local Plan Part 2 as they are central to achieving sustainable development, which is the ultimate goal of the planning system as articulated in the National Planning Policy Framework.
029	009	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>This should include reference to the health and wellbeing implications of:</p> <ul style="list-style-type: none"> <li>- Active travel</li> <li>- Active leisure and play</li> <li>- Access to services, facilities and employment opportunities</li> <li>- Minimising pollution of air, land and water – especially air quality</li> <li>- Food – access to reasonably priced, healthy food and opportunities to grow own food.</li> </ul> <p>Managing proliferation of unhealthy food outlets.</p> <ul style="list-style-type: none"> <li>- Safe and attractive environments</li> <li>- Access to and design of good quality green / open spaces</li> <li>- Housing and street design and quality</li> </ul>
029	010	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	<p>It is therefore requested that an explicit health and wellbeing policy should be included in the East Northamptonshire Local Plan Part 2. This should provide the following background:</p> <ul style="list-style-type: none"> <li>- Reference to the current health and wellbeing of East Northamptonshire's communities and any key issues / challenges.</li> <li>- Reference to the strategic context, including the Northamptonshire Joint Health and Wellbeing Strategy and Northamptonshire Sustainability &amp; Transformation Plan.</li> <li>- An overview of how planning policy and decisions can positively influence health and wellbeing</li> </ul>
029	011	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	The provision of appropriate healthcare infrastructure – i.e. appropriate buildings / facilities to enable the appropriate delivery of healthcare. The policy should address how the healthcare needs associated with a new development will be addressed and where relevant, how the necessary facilities to enable this will be delivered. The facilities may need to be co-located with other community facilities.
029	012	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	Promotion of health and wellbeing and prevention of ill health - It is widely recognised that the way in which the built environment is developed and how communities interact with it has a profound effect on our physical and mental health.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
029	013	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	The policy should require that development proposals seek to create new development that enables and strongly encourages people to lead healthier lifestyles through for example offering excellent opportunities to be physically active, eat healthily, engage with their local community and access local services and facilities.
029	014	13/03/2017	Northamptonshire County Council (Public Health)	Q26	Health and wellbeing	Health Impact Assessment - Major developments / Sustainable Urban Extensions - The policy should also include a process for undertaking Health Impact Assessment as part of the process of reviewing major planning applications or master plans. This process should be proportionate to the size and likely impact of the development, but ultimately should enable a robust assessment of the likely health and wellbeing impact of the development proposals, enabling negative impacts to be mitigated and enabling opportunities to support good community health and wellbeing to be implemented and maximised.
033	006	13/03/2017	Woodford Parish Council	Q26	Health and wellbeing	The plan must address the local health infrastructure. Additional facilities must be provided to meet demand where existing facilities are already at capacity. There must also be provision within the plan to address staff shortages and attract healthcare professionals to the area. For example to assist with the housing needs of health care professionals new health centres could have some attached / tied staff accommodation.
033	007	13/03/2017	Woodford Parish Council	Q26	Health and wellbeing	The Plan should also be forward looking and given the ageing population figures there must be scope for future increased use of the healthcare system
033	008	13/03/2017	Woodford Parish Council	Q26	Health and wellbeing	There must also be provision within the plan to address staff shortages and attract healthcare professionals to the area. Surgeries and Dental Practises etc will not function without staff so there is a need for incentivising staff to move to the area.
033	009	13/03/2017	Woodford Parish Council	Q26	Health and wellbeing	Given the difficulty some health workers have in finding accommodation, perhaps all health centres should also have some form of attached living accommodation, either on or off site which might be used by lower paid staff.
034	052	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q26	Health and wellbeing	The NPPF core policies centre on promoting healthy communities, improving health, social and cultural wellbeing, delivering sufficient community and cultural facilities to meet local needs. It is therefore essential that the LPp2 is supported by a robust evidence base and has properly assessed infrastructure within EN to address any deficiencies and plan for improvements over the plan period. This review must include rural locations.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
038	025	13/03/2017	Davidsons Developments Ltd	Q26	Health and wellbeing	The provision of health infrastructure is vital to support residents. It is however important to ensure that an overarching and cohesive approach to health infrastructure is delivered, and as such it is considered that Northamptonshire County Council is better placed to ensure that this is undertaken. Furthermore, this work would need regular updates.
014	009	09/03/2017	East Northamptonshire Council Housing Strategy	Q27	Rushden East	Further detail is required on housing mix requirements and on the delivery of accommodation for older people. Further detail will be provided through the studies in progress into the housing mix of the district and into older people's accommodation and support needs.
017	026	10/03/2017	Gladman Developments Ltd	Q27	Rushden East	Policy 33 of the JCS contains a number of policy requirements and aspirations for the development of the Rushden East Sustainable Urban Extension (SUE) which have been further refined through the masterplanning exercise that has been undertaken. The Part 2 Local Plan should introduce further policy requirements associated with the masterplan if the local planning authority considers that this as necessary to secure the sustainable delivery of the Rushden East Extension.
020	018	13/03/2017	Historic England	Q27	Rushden East	The Part 2 Plan provides a valuable opportunity to include a detailed policy to ensure the best outcome for a scheme of this size, and the protection and enhancement of heritage assets. In particular Policy 33 does not make reference to heritage assets; therefore a policy within the Part 2 Plan would be strongly recommended.
020	019	13/03/2017	Historic England	Q27	Rushden East	The spire of the Grade I Listed St Mary's Church in Higham Ferrers is of particular prominence within the landscape. Further assessment of how development might impact on the setting of the church and other heritage assets in the centre of Higham Ferrers is needed. Archaeological evaluation should be undertaken, and depending on the issues (advice should be sought from the county archaeologist), reference may need to be made within the detailed policy and / or supporting text. A specific policy criteria is recommended to ensure the protection of heritage assets and it should refer to "St Mary's Church and other heritage assets and their settings"; the policy should clarify that these could be within (e.g. archaeology) or surrounding (e.g. St Mary's Church) the site boundary. I would be very happy to advise further on wording.
032	006	13/03/2017	Environment Agency	Q27	Rushden East	Q27 relates to a significant urban extension to Rushden (1,600 by 2031). We believe that foul flows would go to Broadholme Water Recycling Centre. It is important that your Authority and the developers work closely with Anglian Water Services, as required in Policy 10 of the adopted Joint Core Strategy (JCS) for the provision of wastewater treatment because Broadholme receives flows from development outside of East Northamptonshire.



**Appendix 2: Regulation 18 consultation - schedule of responses by question**

<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
027	001	13/03/2017	Terry Sanders	Q28	Rushden - other sites	We support the cautious approach that is being taken by the Council in respect of the anticipated rate of delivery of the Sustainable Urban Extension at Rushden East, and we share the view that further housing land will therefore be required to meet the JCS target of 3,285 dwellings by 2031.
027	002	13/03/2017	Terry Sanders	Q28	Rushden - other sites	Recent monitoring data identifies a need to allocate land at Rushden for around 350-360 dwellings to deliver the residual requirement for the remainder of the Local Plan period (2016-2031).
027	003	13/03/2017	Terry Sanders	Q28	Rushden - other sites	In this regard our client has a sizeable site at Avenue Road that is available, in whole or in part, for development as shown on the plan at Appendix 1. The site in its entirety covers approximately 65 hectares so if the whole site was developed it could yield around 1000 dwellings. However, given the outlying position of Avenue Road we accept it may be more appropriate and proportionate to consider allocating smaller sections of the land that have a frontage to Avenue Road /Bedford Road. This would allow for a continuation of the ribbon style urban development that is already well established in this locality and thereby make best use of the land without detriment to rural character.
027	004	13/03/2017	Terry Sanders	Q28	Rushden - other sites	We are supportive of the Council's inclusion of the Avenue Road ribbon development as an urban outlier of Rushden that should be included in the consideration of potential development sites in/around urban areas (para 3.6 of the ENC Call for Sites consultation document). Given this, it is clear that our clients land at Avenue Road, despite its outlying position, should not be ruled out as a potential urban allocation associated with Rushden.
043	017	13/03/2017	LXB 3	Q28	Rushden - other sites	Yes. We consider that the Site described earlier in these Representations presents a sustainable location for delivering additional housing. Please refer to the main body of this document for further information.
040	012	13/03/2017	Dr Charles Lane	Q29	Housing requirements (Oundle)	The allocation of additional land for a further 200 dwellings at Oundle, as detailed within the text box of Section 10 of the Regulation 18 Consultation Document is supported. However, as detailed below it is considered that in identifying land to deliver the additional 200+ dwellings, a full and robust assessment of sites should be undertaken again. In so doing, an objective and evidenced assessment should be undertaken.

**Appendix 2: Regulation 18 consultation - schedule of responses by question**

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
040	013	13/03/2017	Dr Charles Lane	Q29	Housing requirements (Oundle)	Question 29 of the Regulation 18 Consultation Document questions whether the two RNOTP potential longer term sites are appropriate to be allocated through the Local Plan Part 2, or whether there are any other sites around the town that could be allocated to deliver the outstanding Local Plan requirements for 200 – 210 dwellings by 2031. It is considered that in identifying land to deliver the additional 200+ dwellings, a full and robust assessment of sites should be undertaken again. In so doing, an objective and evidenced assessment should be undertaken.
040	014	13/03/2017	Dr Charles Lane	Q29	Housing requirements (Oundle)	This is particularly important given that the Council's existing evidence base (The Sustainability Assessment of Sites for Development Plan Documents, Roger Tym and Partners) scores land to the north of Oundle, adjacent to Oundle C of E Primary School, comparably, or arguably better, than the two RNPTP 'longer term sites' the Council has suggested could be taken forward for development. All three sites scored 'Orange' in the assessment.
040	015	13/03/2017	Dr Charles Lane	Q29	Housing requirements (Oundle)	It is requested that a full re-assessment of potential development sites surrounding Oundle is undertaken in allocating land for the 200+ dwellings in Oundle. In so doing, the benefits each site can deliver should be taken into consideration, as too should the opportunity to deliver the housing over two or more sites; this will allow for flexibility to ensure delivery if one site stalls for any reason.
040	016	13/03/2017	Dr Charles Lane	Q29	Housing requirements (Oundle)	Furthermore, the assessment of sites must not be constrained by the Parish administrative boundaries, and the boundaries of the emerging Neighbourhood Plans (which follow the Parish Boundaries. To do this would result in deliverable and sustainable sites being overlooked and does not represent good planning.
040	017	13/03/2017	Dr Charles Lane	Q29	Housing requirements (Oundle)	It is noted that the Summary Text Box 'Local Plan Part 2: housing requirements' states that no further rural housing land allocations are required for the rural area. The Council is proposing to rely on the delivery of housing in the rural area through windfall development. It is considered that in order to ensure the delivery of housing in the rural area, in sustainable locations, some allocations should be made. One such allocation is land in Polebrook. The allocation of a small parcel of land, of the wider redline area illustrated below (Figure 3), will ensure that the Plan delivers the necessary numbers over the plan period, without reliance on windfall development.
042	002	13/03/2017	Northamptonshire County Council (Property)	Q29	Housing requirements (Oundle)	We propose the allocation of land at Oundle Primary School, Cotterstock Road as a housing site to meet needs over the plan period.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
044	001	13/03/2017	Living Land	Q29	Housing requirements (Oundle)	Paragraph 10.2 of the consultation document identifies a residual housing requirement for Oundle of 208 dwellings. The Summary Box on page 24 recognises the requirement to make a strategic allocation(s) of land for 200 dwellings in Oundle. It is suggested that this should be addressed through Local Plan Part 2 strategic site allocations.
044	002	13/03/2017	Living Land	Q29	Housing requirements (Oundle)	Paragraph 10.5 recognises that a Neighbourhood Plan for Oundle would provide opportunities to allocate additional non-strategic housing land allocations. These are described as being small scale site allocations.
044	003	13/03/2017	Living Land	Q29	Housing requirements (Oundle)	At Paragraph 14.3(3) it is again recognised that “Additional housing land allocations at Oundle, to meet residual requirement (200-210 dwellings, 2016-2031)” need to be made through Local Plan Part 2, and Paragraph 14.8 continues “For Oundle, the current Local Plan Part 2 includes sufficient housing land allocations up to 2021. Further housing allocations of around 200-210 dwellings are required for the period, 2021-2031”.
007	021	01/03/2017	Higham Ferrers Town Council	Q30	Irthlingborough East Employment Area	Yes
020	020	13/03/2017	Historic England	Q30	Irthlingborough East Employment Area	Yes, in order to ensure that heritage assets are taken into account, particularly given the policy vacuum in relation to this site. A criteria within a site specific policy should be included such as:- “impact upon Crow Hill scheduled monument and other heritage assets and their settings”
038	026	13/03/2017	Davidsons Developments Ltd	Q30	Irthlingborough East Employment Area	Irthlingborough East (Nene Park/Nene Business Park) is not an employment area and should not be considered as such in the new Local Plan Part 2.
038	027	13/03/2017	Davidsons Developments Ltd	Q30	Irthlingborough East Employment Area	Although, we would support some employment uses in this location, we would not wish to see the area designated solely for employment use. Other uses such as residential and retail should be considered as part of a balanced and mixed community to the east of Irthlingborough. Despite, our client actively marketing their site for commercial/employment uses for nearly ten years, there has been no further take-up and the site remains undeveloped. This evidence suggests that employment uses are not commercially deliverable on the Site. Market evidence such as this should be considered when formulating policy for this area.

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
038	028	13/03/2017	Davidsons Developments Ltd	Q30	Irthlingborough East Employment Area	Furthermore, we do not consider a site-specific policy to be appropriate due to the distinct land ownerships in this area. The client's land is further advanced; it has been partly developed (NHS Centre); has a consent for an Aldi supermarket and day nursery adjacent; and has a planning application currently under consideration for housing development. If a designation is necessary, then these sites should be identified as separate 'Development Sites', where a range of appropriate land uses could be identified/considered.
038	029	13/03/2017	Davidsons Developments Ltd	Q30	Irthlingborough East Employment Area	Further iterations of this plan should provide a plan/figure to outline the exact site area for the redevelopment of Irthlingborough East.
006	005	09/02/2017	Sport England	Q31	Deenethorpe Airfield	Para 14.14 the potential Development of Deenethorpe Airfield [opportunity to improve health and wellbeing]
008	002	20/02/2017	Anglian Water	Q31	Deenethorpe Airfield	Assuming that Deenethorpe Airfield garden village is identified as formal allocation site in the Part 2 Local Plan it would be helpful to define the exemplary standards this development will demonstrate. For example this could include water efficiency for residential development that is better than the optional higher water efficiency standard (of 110 litres per person per day) currently identified in the adopted Core Strategy. Similarly the integration of sustainable drainage and water efficiency/re-use into the overall design should be consider further following the discussion at the recent workshop. In addition it would be helpful to include reference to the expected phasing of the development and how this will be aligned with infrastructure provision including water and water recycling infrastructure.
014	010	09/03/2017	East Northamptonshire Council Housing Strategy	Q31	Deenethorpe Airfield	Further detail is required on housing mix requirements and on the delivery of accommodation for older people. Further detail will be provided through the studies in progress into the housing mix of the district and into older people's accommodation and support needs.
017	027	10/03/2017	Gladman Developments Ltd	Q31	Deenethorpe Airfield	Policy 14 of the JCS introduces the concept of a new garden village at Deenethorpe Airfield. It is understood that this opportunity site has been considered further through the development of masterplanning work. The Part 2 Local Plan should introduce further policy requirements associated with the masterplan if the local planning authority considers that this as necessary to secure the sustainable delivery of the opportunity site.

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
018	013	10/03/2017	National Trust	Q31	Deenethorpe Airfield	The proposed Deenethorpe Airfield Area of Opportunity lies some 3 miles north of property in the National Trust's protection at Lyveden New Bield. Our property comprises a group of highly significant heritage assets including a grade I registered park and garden, two grade I listed buildings and a scheduled ancient monument. The area is highly tranquil with very little modern development in sight. There are extensive views in some directions.
018	014	10/03/2017	National Trust	Q31	Deenethorpe Airfield	The scale of development proposed at Deenethorpe Airfield creates potential for impacts such as skyglow light pollution above intervening woodland.
018	015	10/03/2017	National Trust	Q31	Deenethorpe Airfield	Consultants Wardell Armstrong informed the National Trust that 'the lighting strategy [for Deenethorpe] will adopt techniques designed to avoid light bleed and skyglow light pollution'. (Correspondence dated 28 Oct 2015).
018	016	10/03/2017	National Trust	Q31	Deenethorpe Airfield	We therefore consider that as part of any further policy on Deenethorpe Airfield the following requirements should be included: 1. The impacts of the development on heritage assets at Lyveden New Bield (and elsewhere) are assessed with the aim of avoiding any adverse impacts through design and landscaping. This would ensure, for example, that no tall structures would impact on the quality of views to or from Lyveden. 2. The adoption as part of the site Masterplan of a 'dark skies' policy. The aim of this policy would be to prevent skyglow light pollution from affecting key views northwards from Lyveden New Bield (as well as the landscape character of Rockingham Forest more generally) by guiding the detailed design and specification of a lighting scheme.
020	021	13/03/2017	Historic England	Q31	Deenethorpe Airfield	Amendments were made to JCS policy 14 to reference heritage assets and it is considered that a further policy direction is necessary to ensure that heritage assets are addressed. Heritage assets should be included in the site specific policy and I would be very happy to advise further on wording; in particular Deene Park House and Garden should be referenced together with heritage assets and their settings.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
022	001	13/03/2017	Corby Borough Council	Q31	Deenethorpe Airfield	There is a need to establish a process and engagement with Corby Borough Council, Northamptonshire County Council and other statutory and non-statutory agencies concerning the following cross boundary matters: - Transportation, public transport and other connectivity networks in the immediate environment - Secondary education provision - Green infrastructure and other ecology networks - Ensure market complementary with Priors Hall Park and Weldon Park SUE - Reduced vehicular impact measures to Weldon Village - Cumulative impacts on the strategic highway network particularly the A43 corridor west to Corby Town Centre and the Corby Northern Link Road - Other mitigation measures to reduce the strain on existing infrastructure and improving connectivity and accessibility with Corby Railway Station and Town Centre
032	007	13/03/2017	Environment Agency	Q31	Deenethorpe Airfield	Similarly, Q31 refers to Deenethorpe Airfield development and the same dialogue is required to ensure that adequate wastewater infrastructure is available as required by Policy 5 of the JCS.
007	022	01/03/2017	Higham Ferrers Town Council	Q32	Contingency Sites	Yes
010	017	01/03/2017	Stanwick Parish Council	Q32	Contingency Sites	No
011	009	09/03/2017	Persimmon Homes Midlands	Q32	Contingency Sites	It is important that the Council is able to demonstrate a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements (with an additional buffer) at all times, in line with the provisions of NPPF Paragraph 47. Contingency site allocations enable this to happen where large site allocations fail to come forward on schedule, which is often the case due to the additional complications involved in site assembly, infrastructure provision and coordination.
011	010	09/03/2017	Persimmon Homes Midlands	Q32	Contingency Sites	Additionally, in the context of the NPPF aim to 'boost significantly the supply of housing' the housing requirements set out in the Joint Core Strategy should be viewed as a minimum figure, rather than a maximum. Where there are available sites that could be developed in a sustainable manner these should be considered favourably for allocation in line with this aim.

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Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
012	014	09/03/2017	Investment Land International	Q32	Contingency Sites	As discussed in regards to 'settlement boundaries', it is considered important that the council carefully assess and facilitate growth and development over the plan period. The provision of contingency site allocations is logical as it would be anticipated that these sites will have been carefully assessed and would represent the sequentially preferable sites for development beyond those immediately allocated.
017	028	10/03/2017	Gladman Developments Ltd	Q32	Contingency Sites	Gladman notes the inclusion of a summary relating to housing requirements alongside a proposed approach to the allocation of housing land. Thorough consideration should be given through the development of the Plan to the allocation of land to enable the delivery of housing above the minimum residual requirements that have been identified.
017	029	10/03/2017	Gladman Developments Ltd	Q32	Contingency Sites	Meaningful allocations are required across a wide range of rural settlements to support their ability to thrive. Sufficient land should be allocated to ensure the delivery of the development that is required to support the future sustainability of settlements across the settlement hierarchy and provide greater certainty that overall development needs can be met over the plan period. In particular, the local plan should include allocations that will support the ability of local people throughout the rural area to access much needed new housing. It is therefore considered necessary not to treat the residual housing requirements as a ceiling when assessing future opportunities for sustainable development through the plan making process.
017	030	10/03/2017	Gladman Developments Ltd	Q32	Contingency Sites	In addition, the Part 2 Local Plan should look to identify further housing sites in Principal Villages and Smaller Villages within East Northamptonshire, which can readily come forward to address any housing shortfalls in the short to medium term before the supply from strategic sites comes fully on stream. A strategy should be fully explored through the plan making process that seeks to bring forward further land for residential development in the likely event that supply from the large-scale strategic sites does not match that initially anticipated through the production of the North Northamptonshire Joint Core Strategy (JCS). Such a strategy would help ensure that a genuinely plan led approach can be maintained in East Northamptonshire by securing the effective management of a rolling five year housing land supply.

**Appendix 2: Regualation 18 consultation - schedule of responses by question**

<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
017	031	10/03/2017	Gladman Developments Ltd	Q32	Contingency Sites	In allocating sites, the Council should be mindful that to maximize housing supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets across the markets that exist within the District. The maximum delivery is achieved not just because there are more sales outlets, but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a wide range of non-strategic allocations are required within the Local Plan to ensure that all types of house builder have access to suitable land for development in East Northamptonshire, which in turn will increase the speed of delivery of much needed housing and assist in securing the sustainability of rural settlements.
017	032	10/03/2017	Gladman Developments Ltd	Q32	Contingency Sites	Paragraph 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential, therefore, that the needs of the sustainable rural settlements across the district are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability. The level of growth aimed towards sustainable rural settlements should be sufficient to ensure that the housing needs of the rural population of the district can be addressed.
027	005	13/03/2017	Terry Sanders	Q32	Contingency Sites	We support the cautious approach being taken by the Council in respect of the anticipated rate of delivery of the Sustainable Urban Extension at Rushden East, and the acceptance of the possibility that housing delivery may fall behind the trajectory. This has certainly been the experience of SUEs in other areas of Northamptonshire. In this vein, we support the idea of including a contingency supply of development sites to address potential housing land supply implications, should the major housing requirements proposed through the sustainable urban extension fail to come forward in accordance with the JCS housing trajectory.
027	006	13/03/2017	Terry Sanders	Q32	Contingency Sites	We agree that there is a case for the Local Plan Part 2 to allocate further land to ensure that the supply of deliverable housing and employment sites is maintained throughout the Plan period.
027	007	13/03/2017	Terry Sanders	Q32	Contingency Sites	Our client's site(s) at Avenue Road Rushden, identified above, is one such deliverable site that could help boost the local housing land supply. We have presented this site as a potential site for allocation within the East Northamptonshire Part 2 Local Plan, and whilst a primary allocation, if this is not fruitful we would welcome the possibility of a contingency site allocation.



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<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Question No</b>	<b>Theme</b>	<b>Verbatim comment</b>
027	008	13/03/2017	Terry Sanders	Q32	Contingency Sites	We feel that contingency sites, if being pursued, should be tackled by the Part 2 Local Plan. There is a risk that if the Local Plan was to delegate the allocation of such contingency development sites to the Neighbourhood Plans, that sufficient land may not be identified.
034	053	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q32	Contingency Sites	The Lp2 does not propose to allocate any sites for development in the Rural Area and seeks to rely solely upon windfall delivery of 15 dwellings per year. For the aforementioned reasons, this is considered to be an inappropriate approach and does not represent positive planning. However, if it is taken forward, it is necessary for the Lp2 to identify contingency sites to ensure that development does come forward in the Rural Area if the reliance upon windfalls is unsuccessful.
034	054	13/03/2017	Burghley House Preservation Trust and Hollins Strategic Land LLP	Q32	Contingency Sites	The Lp2 suggests that the LPA could rely upon Neighbourhood Plans (NP) to provide contingency sites. However, the Lp2 also suggests that NPs will only allocate sites to meet identified local needs over and above the 820 minimum target. Therefore, NPs cannot be relied upon to provide the minimum residual requirement.
035	007	13/03/2017	Blatherwycke Estate	Q32	Contingency Sites	The Local Plan Part 2's approach to site allocations should be flexible enough that if further sustainable sites become available throughout the plan period, they can be appropriately considered.
036	011	13/03/2017	Society of Merchant Venturers	Q32	Contingency Sites	Yes – although, as explained above, the SMV consider that in the first instance the Council should identify further site allocations in order to increase dwelling provision overall.
036	012	13/03/2017	Society of Merchant Venturers	Q32	Contingency Sites	However, if the Council were to maintain that the housing requirements have already been met by existing permissions/ allocations (including at Thrapston), the Plan should incorporate a 'contingency plan'. Our suggestion would be to include within the Plan a review and reserve sites mechanism.
037	029	13/03/2017	Catesby Estates	Q32	Contingency Sites	The Rushden East Sustainable Urban Extension ('SUE') (NNJCS Policy 33) is expected to deliver around 2,500 dwellings during the current plan period. The Joint Position Statement between the Council, the Joint Planning Unit, and the promoters of the SUE indicates that the delivery figures (both housing and employment) for the site are based on an application being submitted in summer / autumn 2016. No application has been submitted to date and the Council's website suggests it is now more likely to be 'late summer 2017', with consultation in the masterplan in spring 2017.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
037	030	13/03/2017	Catesby Estates	Q32	Contingency Sites	We submitted robust evidence to the NNJCS Examination demonstrating that the Rushden East SUE was unlikely to deliver within the timescales anticipated by the Council. It remains to be seen whether the masterplan will be consulted in spring and the application will be submitted in late summer of this year; however what is clear is that the SUE is already over a year behind schedule. Any further delay is likely to impact the amount of development that can be delivered at the SUE within the current plan period.
037	031	13/03/2017	Catesby Estates	Q32	Contingency Sites	Given the delays to date, we consider that there is a real risk that the Rushden East SUE will fail to deliver 75% of its projected completions for the period 2016-2019 (triggering a review of the NNJCS). In this context, it is considered essential that the Local Plan Part 2 allocates further land to ensure that the supply of deliverable housing sites is maintained throughout the Plan period.
037	032	13/03/2017	Catesby Estates	Q32	Contingency Sites	We therefore propose that the land to the west of Toll Bar Road, Islip is allocated to address the housing supply implications relating to the slow delivery of the Rushden East SUE.
038	030	13/03/2017	Davidsons Developments Ltd	Q32	Contingency Sites	Although, settlement specific housing requirements under JCS Policy 29/ Table 5 may already be exceeded (by way of completions and commitments) for example in Irthlingborough, this should not automatically prohibit the identification of further sustainable housing sites within these settlements.
038	031	13/03/2017	Davidsons Developments Ltd	Q32	Contingency Sites	The Council needs to ensure that a robust and deliverable supply of housing can be maintained over the plan period. Furthermore, the Council should take every opportunity to significantly boost the supply of housing as expressed within the National Planning Policy Framework.
043	018	13/03/2017	LXB 3	Q32	Contingency Sites	Yes. Please refer to the main document for further information.
044	004	13/03/2017	Living Land	Q32	Contingency Sites	There are potentially two reasons why contingency sites should be identified through LPP2: 1) An allocated site becomes unavailable, or the level of development allocated on the site cannot be achieved due to an unforeseen circumstance; and/ or 2) Changing housing requirements over the plan period necessitate the provision of additional housing within an area.
044	005	13/03/2017	Living Land	Q32	Contingency Sites	Paragraph 157 of the Framework states that: "Crucially, Local Plans should: allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate".

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
044	006	13/03/2017	Living Land	Q32	Contingency Sites	Housing provision is inextricably linked to other matters such as economic growth and associated infrastructure provision and the recent Government White Paper reflects this by seeking to introduce measures requiring Local Plans to be reviewed at least every 5 years. The White Paper also recognises the need to make enough land available for development in the right places, and therefore a clear strategy is necessary to maximise the use of suitable land. The White Paper considers that effective plan-making together with the proposed housing delivery test would boost the supply of housing and mean meeting the housing requirement and ensuring a sufficiently wide range of sites comes forward in the right locations to secure the best outcomes for people and places.
044	007	13/03/2017	Living Land	Q32	Contingency Sites	Allocating contingency sites enables land to be released when it is required to maintain a rolling supply of housing land throughout the plan period and is therefore seen as a positive measure to incorporate into the plan to enable the plan to adapt to meet changes in relation to economic growth. On this basis, Living Land support the allocation of contingency sites through LPP2.
044	008	13/03/2017	Living Land	Q32	Contingency Sites	Whilst supporting the provision of contingency sites within the Plan, Living Land consider there is a need for a mechanism to be incorporated into the Plan/wording of the policy to enable the release of a contingency site. A trigger point could be the falling of the land supply below 5 years; a changing market requirement and an evidenced local need for further housing land; and/or the failure of an allocated site to deliver by a given date.
005	002	07/02/2017	Northamptonshire County Council (LLFA)	Q33	Evidence base	The flood risk management section outlined in Appendix 3 (Evidence base – studies and assessments currently under preparation, or undertaken to date) is welcomed, particularly the references to the Section 19 site-specific Flood Investigations, the Local Flood Risk Management Strategy and the Surface Water Management Plans.
008	003	20/02/2017	Anglian Water	Q33	Evidence base	There is a need to consider the available capacity of existing water and wastewater infrastructure to support additional allocation sites to be identified in the Part 2 Local Plan. We would recommend that this issues is explored as part of the site selection process. Consideration should also be given to the potential for encroachment of Anglian Water’s assets in addition to the environmental designations etc.
008	004	20/02/2017	Anglian Water	Q33	Evidence base	We note that the North Northamptonshire Core Strategy already includes a borough wide policy relating to water supply, water quality and wastewater infrastructure (Policy 5).Therefore it is not considered necessary to include a similar policy in the Part 2 Local Plan.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
008	005	20/02/2017	Anglian Water	Q33	Evidence base	However it would be helpful to consider whether there any specific development criteria for the proposed allocation sites (once identified) which are needed relating to water and water recycling infrastructure.
011	011	09/03/2017	Persimmon Homes Midlands	Q33	Evidence Base	A further update to the Strategic Housing Market Assessment would be appropriate to take account of the latest household projections and provide a current overview of the housing needs in the area.
012	015	09/03/2017	Investment Land International	Q33	Evidence base	Having reviewed the list of studies and baseline information set out at Appendix 3 of the consultation document, we are concerned that a number of studies are or are close to have being undertaken in excess of five years ago.
012	016	09/03/2017	Investment Land International	Q33	Evidence base	It is considered of vital importance that the plan is prepared in accordance with the most up-to-date information, to ensure that the policies produced are both accurate and avoid tangible critique.
014	011	09/03/2017	East Northamptonshire Council Housing Strategy	Q33	Studies and baseline information (evidence base)	Further detail will be provided through the studies in progress into the housing mix of the district and into older people's accommodation and support needs: Informing East Northamptonshire's Housing Mix – Housing Vision – final report due May 2017 Accommodation and Support Needs of Older People in Northamptonshire – Three Dragons – final report due late March 2017
017	033	10/03/2017	Gladman Developments Ltd	Q33	Evidence base	Gladman note that the Council has a range of evidence base documents of varying ages. The Council should ensure that all of its evidence base documents are sufficiently up-to-date in order to support the drafting of robust policies within the Part 2 Local Plan. This includes the need to consider the extent to which the evidence base justifies the introduction of particular policies within the Plan. The evidence base and the emphasis of draft policies should be fully in line with that contained within the National Planning Policy Framework (The Framework) and the Planning Practice Guidance (PPG).
017	034	10/03/2017	Gladman Developments Ltd	Q33	Evidence base	The Council's site selection process must also be suitably robust and should, alongside the Sustainability Appraisal, provide clear justification for any policy choices that are made. Gladman look forward to reviewing this evidence base when it is completed in due course.
020	022	13/03/2017	Historic England	Q33	Evidence base	Baseline data in relation to the historic / built environment is not considered to be sufficiently comprehensive. For example Conservation Area Appraisals are not included together with any Landscape studies which may have heritage references. Further guidance on baseline data can be found in the guidance referenced above.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
020	023	13/03/2017	Historic England	Q33	Evidence base	<p>The evidence base is critical to the preparation of a Local Plan in accordance with paragraph 169 and 10 of the NPPF. Particularly relevant to site and allocations and designations could include the following:-</p> <ul style="list-style-type: none"> <li>- Updating conservation area appraisals</li> <li>- Undertaking characterisation studies</li> <li>- Producing setting studies – of specific settlements, or specific heritage assets</li> <li>- Local lists</li> <li>- Assessments of landscape sensitivity</li> </ul>
020	024	13/03/2017	Historic England	Q33	Evidence base - Site specific policies	<p>Historic England would strongly welcome early informal consultation regarding site allocations. Is the SHLAA / SELA methodology to be revised? I would be very happy to provide comments. It is not possible to comment on the potential sites listed given the number and without maps. Historic England would be keen to comment at an early informal stage with more detail and when sites are proposed to be allocated.</p>
022	002	13/03/2017	Corby Borough Council	Q33	Evidence base	<p>East Northamptonshire District Council should ensure that its evidence base is sufficiently robust and up-to-date to address the above matters.</p>
032	008	13/03/2017	Environment Agency	Q33	Evidence base	<p>we have yet to find any reference to the North Northamptonshire Detailed Water Cycle Strategy (WCS) prepared by Halcrow in 2009. Your Authority should consider a refresh to the WCS and refer to it in the Local Plan Part 2. This would provide the opportunity to clarify how wastewater will be provided for Rushden urban extension and Deenthorpe Airfield development as well as updating the WCS document in the context of your local area.</p>
032	009	13/03/2017	Environment Agency	Q33	Evidence base	<p>Water quality - We welcome reference to the Nene Integrated Catchment Management Plan in the Reg. 18 consultation document, especially appendix 3 which focuses on the water framework directive (WFD). We consider references in the SA report to WFD and RBMP satisfactory. In terms of evidence base, we recommend that you reference some Nenescape projects, namely: 'Resilient Rivers' and 'Farming for the Future' because they contribute to WFD and could be included in the relevant water section or elsewhere as deemed appropriate.</p>
032	010	13/03/2017	Environment Agency	Q33	Evidence base	<p>Contaminated land - We find that issues relating to land contamination, brownfield development etc. have their own policy in the JCS. We are satisfied with these so we have no further comment at this stage.</p>

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
033	010	13/03/2017	Woodford Parish Council	Q33	Evidence base	Reference to Woodford Community Plan, adopted by Parish Council in 2015 - Traffic issues - A Community Plan was created in 2014/15 in Woodford and in answer to questions relating to future development, there was significant resistance. “The size of the village, its rural location, with good access to major road and rail networks, are key aspects. A high proportion of respondents to the questionnaire consider that the village is now at its optimum size and that further housing development would not be desirable – 83% did not want further housing development.” The full plan can be found at <a href="http://www.woodfordpc.co.uk/vplan.htm">www.woodfordpc.co.uk/vplan.htm</a>
033	011	13/03/2017	Woodford Parish Council	Q33	Evidence base	The JCS Spatial Development Strategy produced in 2012 (certainly in respect of Woodford) could be considered as being very much out of date. In particular two of the three pubs which existed at that time have now closed.
033	012	13/03/2017	Woodford Parish Council	Q33	Evidence base	Transport - Car ownership seems to have increased significantly creating numerous traffic issues. Eg The High Street is now very much single carriageway due to the volume of parked vehicles, and any future development will only make matters worse. Consequently before deciding upon future potential development in any rural area up to date traffic surveys of the surrounding road networks area are essential.
037	033	13/03/2017	Catesby Estates	Q33	Evidence base	As identified above it is necessary to review the Council’s Employment Land Review, given it is now over 10 years out of date, in order to inform a review of the existing employment land designations and the allocation at Rushden East SUE.
038	032	13/03/2017	Davidsons Developments Ltd	Q33	Evidence base	It is essential that development plans are based on robust and up to date evidence. Although it is acknowledged that council resources are stretched, it is vital that the evidence base is kept up to date and based on the most recent data available. The Employment Land Review (ELR) should be updated as the most recent version is dated 2006. An update also needs to be considered in relation to the Housing White Paper.
043	019	13/03/2017	LXB 3	Q33	Evidence base	Should new or updated evidence emerge during the preparation of the Council’s Local Plan Part 2, such information should be considered when determining the plan’s spatial strategy and policies.

## Appendix 2: Regualation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
005	003	07/02/2017	Northamptonshire County Council (LLFA)	Q33	Evidence base	It is recommended that early discussion are undertaken with the Environment Agency in relation to the adequacy of the evidence base and in particular the Strategic Flood Risk Assessment Level 1 and 2 reports. There has been a significant level of updated information published in relation to flood risk since 2012 (when the most recent report was published) including new surface water and ground water data and there have also been two flooding incidents in November 2012 and March 2016. Both incidents have provided increased knowledge regarding specific geographical locations which experience flooding and all of this increased understanding could be used to inform and update the sequential testing process.
004	001	27/01/2017	CLH Pipeline System Ltd	Q34	Strategic infrastructure - factual information re pipeline	Thank you for your email to CLH Pipeline System Ltd dated 26 January 2017 regarding the above. Please find attached a plan of our clients apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to <a href="http://www.linesearchbeforeudig.co.uk">www.linesearchbeforeudig.co.uk</a> our free online enquiry service.
012	017	09/03/2017	Investment Land International	Q34	Policy outcomes	As discussed in relation to question 1, it is considered that this plan should be consistent with Part 1 of the Local Plan, and accordingly the themes and topics of the document should correspond.
029	015	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	Health and wellbeing challenges - There are significant health and wellbeing challenges being faced by us as a nation and at a local level. Whilst we are generally living longer lives, more of our lives are being spent in poor health due to a range of factors including lifestyle choices.
029	016	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	This longer time spent in poor health is having major impacts on the quality of life of many of our communities as well as placing massive pressures on our healthcare and social welfare support systems. In response to this it is increasingly acknowledged that we need to do more to prevent ill health through supporting positive lifestyle choices that contribute to good health and wellbeing.
029	017	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	East Northamptonshire – Health and Wellbeing - The September 2016 Health Profile for East Northamptonshire ( <a href="http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000152.pdf">http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000152.pdf</a> ) provides a summary of health and wellbeing indicators for the district and identifies that: - An estimated 21.7% of adults smoke. - 16.1% of children (year 6) are obese. - Only 58.6% of adults are deemed to be physically active. - Excess weight in adults - The percentage of adults who are classed as overweight or obese is 69% (England average 64.6%) These issues pose significant implications for the current and future wellbeing of East Northamptonshire residents.

## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
029	018	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	Health & wellbeing and planning - It is widely acknowledged that healthcare and health services are a relatively minor overall influence in our health and wellbeing. In fact, international studies suggest healthcare contributes about 10% to preventing premature deaths, whilst changes in behaviour patterns are estimated to contribute 40%.
029	019	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	The NHS 5 Year Forward View recognises this and the need for a radical upgrade in prevention and public health, in order to improve the health of millions of children, achieve financial sustainability for the NHS and maintain the economic prosperity of Britain.
029	020	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	Linked to this, it is also widely recognised that land use planning policies and decisions can have a major impact on the health and wellbeing of communities, due to their influence on our living, working and leisure environments and thus on our lifestyle choices and behaviours.
029	021	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	The important role of planning in influencing health and wellbeing is acknowledged through a range of initiatives such as: - Town and Country Planning Association – reuniting health with planning initiative - <a href="http://www.tcpa.org.uk/pages/health.html">http://www.tcpa.org.uk/pages/health.html</a> - Town and Country Planning Association – Planning Healthy Weight Environments initiative - <a href="https://www.tcpa.org.uk/healthyplanning">https://www.tcpa.org.uk/healthyplanning</a> - NHS Healthy New Towns Initiative - <a href="https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/">https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/</a> - Spatial Planning and Health Group - <a href="http://www.spahg.org.uk/">http://www.spahg.org.uk/</a>
029	022	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	National Planning Policy Framework (NPPF) - Promoting healthy communities is clearly identified in the National Planning Policy Framework. Health and wellbeing is a vital part of sustainable development and achieving sustainable communities.
029	023	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	Northamptonshire's Joint Health and Wellbeing Strategy & Northamptonshire Sustainability and Transformation Plan. <a href="http://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/Pages/health-and-wellbeing-strategy.aspx">http://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/Pages/health-and-wellbeing-strategy.aspx</a> - The recently adopted 'Northamptonshire Joint Health and Wellbeing Strategy 2016-2020: Supporting Northamptonshire to Flourish', explicitly acknowledges the role that planning and the environment can play in influencing health and wellbeing, as well as the importance of supporting communities to make healthy choices. One of the identified priorities is 'Creating an environment for all people to flourish'. Given the scale of growth planned for the county, planning will play a significant role in delivering this strategy.



## Appendix 2: Regulation 18 consultation - schedule of responses by question

Respondent ref	Comment ref	Date	Respondent Name	Question No	Theme	Verbatim comment
029	024	13/03/2017	Northamptonshire County Council (Public Health)	Q34	Policy outcomes	The Northamptonshire Sustainability & Transformation Plan identifies the need to much more effectively prevent ill health in order to achieve sustainable health and social care systems in the county, as well as providing more healthcare in community settings where it is appropriate to do so.
038	033	13/03/2017	Davidsons Developments Ltd	Q34	Policy outcomes	We agree with the general outline of the proposed Local Plan Part 2, although appreciate this may evolve as the Plan is developed. We request consideration of a plan which sits comfortably within the context of the NNJCS and response to the emerging details within the Housing White Paper.

### Appendix 3 - Sustainability Appraisal Scoping and Habitat Regualtions Assessment Screening - schedule of responses

SA Scoping Report						
Respondent ref	Comment ref	Date	Respondent Name	Paragraph No	Theme/ summary comment	Verbatim comment
009	001	20/02/2017	North Northants Badger Group	3.4.10	Housing requirement	the issue cited refers to maintaining or exceeding the JCS requirement for housing. However exceeding the requirement would be unsustainable with more housing allocations required during the plan period and hence requirement for either early plan review or planning by appeals. It is considered that the issue is about maintaining a phased supply of housing in accordance with agreed housing trajectories which is a more sustainable way forward than planning by market forces i.e. a phased approach which may sometimes lead to fluctuations in housing completion rates.
009	002	20/02/2017	North Northants Badger Group	3.5.2	Open space	references should include all forms of open space not just public open space. The section appears to be heavily bias to sporting activities and organised sport and recognition is required to more general countryside activity or informal walking etc.
009	003	20/02/2017	North Northants Badger Group	3.5.10	Health/ wellbeing	it is considered that references should be made to 'outdoor activities' and the benefits of access to outdoor facilities and natural areas in relation to both mental and physical health
009	004	20/02/2017	North Northants Badger Group	3.6.11	Crime	East Northamptonshire is a mostly rural district but this is not recognised in this sector. Reference should be made to issues surrounding rural crime and wildlife crime.
009	005	20/02/2017	North Northants Badger Group	3.9.1	Liveability	the references are supported
009	006	20/02/2017	North Northants Badger Group	3.9.2	Liveability	the references are supported
009	007	20/02/2017	North Northants Badger Group	3.10.3	Biodiversity	the references are supported. Habitat fragmentation is a major issue relating to long term survival of protected species.
009	008	20/02/2017	North Northants Badger Group	3.10.4	Biodiversity	the references are supported
009	009	20/02/2017	North Northants Badger Group	3.10.11	Biodiversity	the emphasis here appears to mainly relate to river corridors yet there are many woodlands in the area and areas of nature conservation value or protected species which have become isolated because infrastructure such a roads or intensive agricultural practices. Enabling the ability of plants and animals to migrate along corridors is a key climate change issue as well. It should be clear that this is an important sustainability issue.

### Appendix 3 - Sustainability Appraisal Scoping and Habitat Regulations Assessment Screening - schedule of responses

Respondent ref	Comment ref	Date	Respondent Name	Paragraph No	Theme/ summary comment	Verbatim comment
009	010	20/02/2017	North Northants Badger Group	3.10.13	Biodiversity	this is welcomed as an important consideration
009	011	20/02/2017	North Northants Badger Group	3.11.8	Landscape	the references in the fifth bullet point a welcomed
009	012	20/02/2017	North Northants Badger Group	3.13.8	Climate change	whilst there are references to adapting to climate change within the Scoping Report the issues recognised relate to more technological solutions not natural ones such as increasing or maintaining greenspace, allowing for migration or species movement and recognising the adverse environmental impacts of some 'green' technologies
009	013	20/02/2017	North Northants Badger Group	3.17.7	Soil and land	the references are supported
009	014	20/02/2017	North Northants Badger Group	3.19.3 & 3.19.7	Energy Use	the issue of the possible impact of renewable and low carbon energy developments on wildlife should also be recognised and balanced along with agricultural and landscape impact.
009	015	20/02/2017	North Northants Badger Group	3.21.5	Employment	references should be made to issues surrounding the agricultural economy in particular recognition of the importance within the district, diversification and impact of development e.g. as one example the grain industry and local breakfast cereal industry etc
009	016	20/02/2017	North Northants Badger Group	5.1.1	SA methodology	Whilst the overall logic of using the JCSS framework is understood overall as a rural district the importance of, and, responsibility for rural issues regarding both agriculture and wildlife/ ecology should be more widely recognised as a sustainable issue and stronger recognition of this introduced as an important local issue. In terms of North Northamptonshire these issues relate far more to East Northamptonshire than any other district in North Northamptonshire.
017	035	10/03/2017	Gladman Developments Ltd	n/a	Function of SA	In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

### Appendix 3 - Sustainability Appraisal Scoping and Habitat Regualtions Assessment Screening - schedule of responses

Respondent ref	Comment ref	Date	Respondent Name	Paragraph No	Theme/ summary comment	Verbatim comment
017	036	10/03/2017	Gladman Developments Ltd	n/a	Function of SA	The Part 2 Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Part 2 Local Plan's scoring and associated decision making should be robust, justified and transparent. The sustainability merits of all of the reasonable alternatives should be fully explored and tested in the context of their ability to achieve a sustainable form of development that fully support the economic, social and environmental objectives of the area.
020	026	13/03/2017	Historic England	n/a	SA methodology	Overall, the Sustainability Appraisal is not sufficiently comprehensive to allow for sufficient assessment in relation to heritage assets. I would refer you to the guidance above for further details.
020	027	13/03/2017	Historic England	n/a	SA methodology	Reference to the use of the JCS objective in relation to cultural heritage is welcomed; it would be beneficial to update this to include reference to heritage assets to ensure compliance with the NPPF, such as:- "Conserve and enhance the historic environment, heritage assets and their settings"
020	028	13/03/2017	Historic England	3.12	Cultural Heritage	Section 3.12 is welcomed, although is it considered somewhat brief. Reference to non-designated heritage assets and the production of a comprehensive list is strongly welcomed.
020	029	13/03/2017	Historic England	n/a	Baseline data	Concerns as expressed above in relation to baseline data apply; comprehensive baseline data is required to form the basis of a sound plan in accordance with the NPPF.
020	030	13/03/2017	Historic England	n/a	SA methodology	There is insufficient information for the methodology in relation to heritage. Detailed site assessment criteria are required to comply with the NPPF and ensure a sound plan. Historic England would be happy to advise further. In particular, proximity should not be used as a gauge of harm or impact. The use of proximity does not comply with the NPPF – impact upon the setting of assets can occur from a great distance and not simply from sites 'in close proximity' to an asset, dependant on the type of development.
020	031	13/03/2017	Historic England	n/a	SA methodology	Overall, we consider that amendment is required to ensure soundness and that the requirements of the Directive and Legislation in relation to cultural heritage are met. Our guidance provides further information on how these can be met. We are happy to further advise on these as appropriate.

**Appendix 3 - Sustainability Appraisal Scoping and Habitat Regualtions Assessment Screening - schedule of responses**

<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Paragraph No</b>	<b>Theme/ summary comment</b>	<b>Verbatim comment</b>
032	012	13/03/2017	Environment Agency	3.16.6	River Nene Catchment	Looking at the current consultation document, we see direct links with reference to improvements to the River Nene Catchment as underlined in the bullet points below and to the Greenway especially providing outdoor recreation
032	013	13/03/2017	Environment Agency	3.16	Flood Risk	We welcome the content of section 3.16 which focuses on the need to reduce the impact of flooding in the area. We recommend that the evidence base includes reference to strategic flood risk assessment (SFRA) on page 48 of the Regulation 18 Consultation, and that the following changes are considered in the SA scoping document:
032	014	13/03/2017	Environment Agency	3.16.1	Flood Risk	Main Rivers rather than Watercourses
032	015	13/03/2017	Environment Agency	3.16.7	Flood Risk	See also Environment Agency mapping on <a href="https://flood-map-forplanning.service.gov.uk/">https://flood-map-forplanning.service.gov.uk/</a>
032	016	13/03/2017	Environment Agency	3.16.10-11	Flood Risk	Need to consider whether the SFRA will require updating to take into account new mapping and modelling data as well as updated allowances for climate change. The extent of work required will depend on whether any sites are likely to be considered in or within close proximity to flood Zones 2 and 3. We are providing updates on the state of our modelling data in a separate.
045	012	13/03/2017	Natural England	n/a	SA methodology	Natural England is broadly satisfied with the proposed scope of the Sustainability Appraisal
<b>HRA Screening</b>						
<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name (Organisation/ individual, as appropriate)</b>	<b>Paragraph No (if specified)</b>	<b>Theme/ summary comment</b>	<b>Verbatim comment</b>
045	013	13/03/2017	Natural England	n/a	Detail	We would expect to see a more detailed HRA screening report and currently cannot agree with no likely significant effect . We note the HRA screening has identified that the part 2 plan is within the parameters of the JCS for both housing development and distribution.

**Appendix 3 - Sustainability Appraisal Scoping and Habitat Regualtions Assessment Screening - schedule of responses**

<b>Respondent ref</b>	<b>Comment ref</b>	<b>Date</b>	<b>Respondent Name</b>	<b>Paragraph No</b>	<b>Theme/ summary comment</b>	<b>Verbatim comment</b>
045	014	13/03/2017	Natural England	n/a	Housing requirement	It would be useful if the amount of housing coming forward in the part 2 plan could be confirmed, particularly any housing proposed within the 3km zone of influence (for identifying recreational disturbance impacts) around the Upper Nene Valley Gravel Pits SPA. The existing mitigation strategy has been calculated based upon 3851 new dwellings (2059 in East Northamptonshire) within 3km of the SPA. If the part 2 plan is in line with this figure the mitigation strategy will still apply to housing coming forward and a conclusion of no likely significant effect can follow, for recreational disturbance impacts.
045	015	13/03/2017	Natural England	n/a	Housing requirement	However, if the housing numbers identified for part 2 now exceed the JCS figures within the 3Km zone of influence, this would need to be explored through an appropriate assessment and modifications made to the mitigation strategy.
045	016	13/03/2017	Natural England	n/a	Environment	Furthermore, once the policies of the part 2 plan have been finalised they will also need to be screened, for matters other than recreational disturbance, such as functionally linked land (loss of land outside the European Site Boundary, but which may still be used by birds associated with the SPA), Water Quality, Water resource and Air quality. It is important any potential issues are resolved at the part 2 stage, to ensure there are no complications for future neighbourhood plans.

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN001	Land south east of Rushden	Housing		72.5	Mr & Mrs Robinson	None applicable	Newton Road	The site is located to the south of the proposed Rushden SUE and offers the opportunity for the future expansion of the SUE [SEE ALSO CFSU32/ CFSU33]
CFSN002	Land to the south of Glapthorn village	Mixed Use	The land available covers an extensive area to the south of Glapthorn extending as far as the southern most field boundary shown on the map above.	52.5	G E Reading & Sons	The land is currently outside the settlement boundary of Glapthorn. There are no known constraints to the development of the site.	Glapthorn Road	The site comprises a number of arable fields interspersed with flayed hedgerows. Whilst the land is fairly exposed in the landscape extensive landscape mitigation can be provided which and would also serve to improve biodiversity.
CFSN003	Land at Broad Acres Shelton Road Raunds	Housing		24.5	Farrington		Off Shelton Road Raunds	
CFSN004	Land off Chelveston Road	Housing		23.5	Lake and Fitch c/o Agent	none to our knowledge	off Chelveston Road	
CFSN005	Land to SE of Raunds	Housing		22.0	Hodgeson c/o Agent	none to our knowledge	Newton or Shelton Road	
CFSN006	Field to the South of Broad Acres Shelton Road Raunds	Housing		19.5	Farrington		Off Shelton Road Raunds	

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN007	Land at Springfield Farm, Thraspton	Housing		13.0	Society of Merchant Venturers	Adjacent to the Upper Nene Valley Gravel Pits SPA. However, the development of our client's land provides an opportunity to enhance (and improve access to) the green infrastructure corridor (disused railway).	Oundle Road	Our Client's land at Springfield Farm, Thrapston has the potential to deliver around 250 - 300 dwellings [DUPLICATE: CFSU35]
CFSN008	Land north of Needham Road, Stanwick	Housing		12.5	Letts c/o Agent	none to our knowledge	Various means of access	
CFSN009	Land at Avenue Road, Rushden	Housing		12.3	Sanders	Public Right of Way (footpath UK9) crosses the site, but this could be accommodated in any development without the need for diversion	Off Avenue Road. There are a range of points at which access could be taken off Avenue Road, and th	Part brownfield land (the farmyard at 161 Avenue Road). This section of our clients site could accommodate a modest linear development of around 30 dwellings or a larger development of around 240 dwellings (at 20dph).
CFSN010	Land to the east of Hayway and south of Northampton Road, Rushden	Housing	N/A	11.0	Amberville Properties Ltd have a legal controlling interest in the land	No known constraints to development	Access opportunities exist on to the Hayway to the east and feasibility work is ongoing	Please see attached letter submitted to the Local Plan Part 2 (Regulation 18) consultation by CC Town Planning on behalf of Amberville Properties Ltd [SEE ALSO CFSU31]



#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN011	Land south of Stamford Road, Easton on the Hill	Housing	The site is capable of delivering mixed use led development to include housing, employment, community and open space provision	10.8	Burghley House Preservation Trust and Hollins Strategic Land LLP	There are no known constraints to development that could not be otherwise appropriately mitigated.	Access is from Stamford Road	The site will be masterplanned having regard to best practice techniques, local vernacular design and place making principles. The site will provide an opportunity to work with the local community on enhanced local benefits [DUPLICATE: CFSR24]
CFSN012	Brigstock Camp, Stanion Road	Mixed Use	Please see supporting statement	10.3	BRIGSTOCK DEVELOPMENTS LIMITED	Please refer to supporting statement	Existing access off Stanion Road	Please refer to supporting statement [RNOTP BC1]
CFSN013	Whitworths Site, Wellingborough Road, Irthlingborough	Housing		9.1	Whitworths	Overhead power lines along SW edge of the site. Existing land use will necessitate demolition and remediation to make site suitable for residential development.	Wellingborough Road	Emergency access link to George Street and link to be provided through to Irthlingborough West development.  Site considered suitable for up to 360 dwellings with associated public open space.
CFSN014	Land to the east of Polebrook - Site C	Housing		7.9	Dr Charles Lane	Existing woodland identified on the Priority Habitat Inventory is located within the site. Through the provision of appropriate buffers in the layout of a development, there will no harm to the existing woodland.	A new vehicular access to the site is proposed off Luton Road	

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN015	Land to the East of Raunds Road and North of Kimbolton Road, Chelveston	Mixed Use	The land would be suitable for either a residential ribbon development along Raunds Road or alternatively a larger mixed use development between Raunds Road and Kimbolton Road.	6.5	Carr Farmer (Northants) Ltd, Manor Farm, Chelveston, WELLINGBOROUGH, Northamptonshire, NN9 6AR	None	Road Frontage on Raunds Road or Kimbolton Road	The landowner does not consider this to be a viable piece of land in the short term but would consider releasing it for development in a 10 to 15 year timeframe.
CFSN016	Land at Avenue Road / Bedford Road, Rushden	Housing		6.5	Sanders	None known	Off Avenue Road or Bedford Road. There are a range of points at which access could be taken.	This section of our clients site could accommodate a modest linear development of around 30 dwellings or a larger development of around 120 dwellings (at 20dph). No part of the site is situated within flood plain.
CFSN017	Land east of Raunds Road, Stanwick	Housing		6.3	Investment Land International Limited	Small group of protected trees close to south western boundary (TPO 0152).  No other constraints currently identified.	Raunds Road	
CFSN018	Raunds Road/ Church Street, Ringstead	Housing		6.1	Norman	none to our knowledge	off either Church Street or Raunds Road	

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN019	Land West of Denford Road, Ringstead	Housing		5.8	c/o Gladman Developments Limited	none	The site can be accessed from Denford Road	The site is suitable, available and achievable and can be brought forward in the short term for the delivery of circa 100 dwellings
CFSN020	Land off Glapthorn Road, Oundle	Housing	The land is available for housing.	5.5	G E Reading & Sons	The site is outside the settlement boundary of Oundle as shown on the RNOTP. There are no known constraints. Part of the site is within the sand and gravel safeguarding area however this is not seen as a development constraint.	Glapthorn Road	The site is immediately to the north of the settlement of Oundle. Its development would not lead to a coalescence with the village of Glapthorn. The site has a frontage on to Glapthorn Road.
CFSN021	Land to the North of Broad Acres Shelton Road Raunds	Housing		5.0	Farrington		Off Shelton Road Raunds	
CFSN022	Hillstone Field west of Bottom Farm House, Brook Street, Hargrave	Housing	Could be for Employment use	4.7	Farrington		Off Brook Street	

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN023	Land to the east of St. Christopher's Drive, Oundle	Housing	N/A	4.6	John Reynolds	All relevant technical work including a Noise Assessment, Phase 1 ground investigation, Flood Risk Assessment, Desk-based and Trial Trench evaluation, Phase 1 Ecological Assessment, Landscape and Visual Impact Assessment, Transport Assessment has been done	The site will be served by a new access formed by an extension of St. Christopher's Drive	The land was subject to an Outline application (13/01245/OUT) submitted to the Council in July 2013. The application was refused on the grounds that the Council could demonstrate a deliverable five year housing land supply [DUPLICATE: CFSU16]
CFSN024	Land adjacent to Cemetery, Stoke Doyle Road, Oundle	Housing		3.5	Oundle Feoffees - Option to David Wilson Homes	Land along Brook edge is identified as flood risk, no development is proposed in this area. No other known constraints	Stoke Doyle Road	David Wilson Homes are working with Oundle Town Council to promote the site through the Oundle Neighbourhood Plan for 50 dwellings and an extension to the cemetery. There is potential for further development in this area [SEE ALSO CFSU17]
CFSN025	Land North of West Street, Stanwick	Housing		3.4	c/o Gladman Developments Limited	none	The site can be accessed from West Street	The site is suitable, available and achievable and can be brought forward in the short term for the delivery of circa 70 dwellings [SEE ALSO CFSR52]

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN026	Land at the Rookery, south of Ashton Wold Drive	Housing		3.3	Dr Charles Lane	The site is bound by mature trees and hedgerows which screen and contain the site. These are proposed to be retained and enhanced as part of any residential development on the site.	Vehicular access to the site is currently achieved via a field access at the north western corner of	
CFSN027	Land south of Northampton Road, Rushden	Housing	Proposed Housing Allocation - East Northamptonshire Local Plan Part 2	3.0	Landowner: Mrs L. Button c/o Site Promoter: Davidson Development Ltd	There are no known development constraints associated with this site which preclude development. There are a number of potential site constraints which can be robustly addressed through any future application process.	Vehicular, pedestrian and cycle access will be achieved via a junction off Northampton Road. A safe	The site was assessed as part of the North Northamptonshire Strategic Housing Land Availability Assessment (SHLAA) (May 2013). The site fell within a larger area assessed by the SHLAA (Ref: 989) [SEE ALSO CFSU31]
CFSN028	Land off Roberts Lane	Housing		2.8	Roberts Family		Roberts Lane	
CFSN029	Land off Lyveden Road	Housing		2.5	Wooster/Andrews Family c/o Agent	none to our knowledge	off Lyveden Road	[DUPLICATE: CFSR07]
CFSN030	Land off Mill Road, Woodford	Housing		2.0	Shortland c/o Agent (Henry H Bletsoe & Son LLP)	n/a	Off Mill Road	[DUPLICATE: CFSR64]

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN031	Land to the east of Higham Road, Stanwick	Housing		2.0	Augustus Allebone Settlement	None known	Off Higham Road at the point considered most suitable from a highways point of view.	Our client's 2 hectare site could accommodate a residential development of up to 88 dwellings which would be a significant contribution towards meeting the residual housing requirement of 220 dwellings for the rural areas of East Northamptonshire
CFSN032	Land south os Stanion Road, Brigstock	Housing		2.0	Mr P Singlehurst	Part for the site is within the Environment Agency indicated Flood Zone 2 and 3. The site is outside the settlement boundary as shown in the RNOTP.	Stanion Road	An area of land directly fronting Stanion Road is not in the flood plain and could offer the opportunity for a small residential development. The land opposite the site is residentially developed fronting a small estate known as Bells Close.
CFSN033	Elton Estate Land North of Church Street Warmington	Housing		1.9	Sir William Proby	None	Church Street warmington	I can supply a plan of the proposed area
CFSN034	Land west of Morgans Close Polebrook	Housing	na	1.9	Mr & Mrs R. Case	None	The Main Access would be via Morgans Close into the centre of the development site.	Part of this site has been previously considered for residential Development.
CFSN035	former Oundle and Kings Cliffe Middle School land, Kings Forest, Kings Cliffe	Mixed Use		1.9	Northamptonshire County Council	none	Kings Forest	Previously developed land, suitable for housing and potentially community/ health uses.

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN036	Land off Midland Road, Thrapston	Housing		1.8	Chapman	Flooding on low lying land nearest river	off Midland Road	
CFSN037	Land off Orchard Lane, Kings Cliffe	Housing		1.7	Mr M Day	Part of the site is within the Environment Agency's identified flood zone 3. The site is outside the settlement boundary of Kings Cliffe	Orchard Lane	The site slopes down to the west towards Willow Brook. On the higher ground in the eastern corner of the site are a number of former agricultural buildings. These are redundant and in a poor state.
CFSN038	Land to North of Raunds	Housing		1.6	Hodgeson c/o Agent	none to our knowledge	to be determined in conjunction with adjoining site	
CFSN039	The Nissen Huts north of Ashton Wold Drive, adjacent to Home Farm.	Other	Tourism	1.6	Dr Charles Lane	The site is bound by mature trees identified as deciduous woodland on the Priority Habitat Inventory. This submission proposes the re-use of the existing Nissen Huts within the site for holiday accommodation.	Vehicular access to the site is currently achieved off Ashton Wold Drive.	

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN040	Land to the east of Polebrook - Site A	Housing	Mixed use/ Residential Care Home	1.6	Dr Charles Lane	Existing woodland identified on the Priority Habitat Inventory is located adjacent to the site. Through the provision of appropriate buffers in the layout of a development, there will no harm to the existing woodland.	Vehicular access to the site is currently achieved via a lane off Main Street/Luton Road	
CFSN041	Land off Spencer Street, Ringstead (Dodson & Horrell/ Crowhurst)	Housing	The land is currently used for industrial use, retail use associated with the principle site use and residential garden and paddock.	1.6	Dodson & Horrell and Mr P Crowhurst	The site has been the subject of detailed evaluations by Paul Newman New Homes and is readily capable of development. The site will shortly be the subject of a formal pre-application submission. Architectural schemes have been produced (based on deta	Off Spencer Street	The existing Dodson & Horrell production facility is a non-conforming use in an otherwise residential village location, which generates considerable lorry movements which together with on-site activities have consequent impacts on residential amenity
CFSN042	Land east of Poultry Farm, Winwick Road, Thurning	Housing		1.5	Chapman c/o Agent	none to our knowledge	Winwick Road	
CFSN043	Land at Titchmarsh	Housing		1.5	M Alderman	none to our knowledge	off public highway	



**Appendix 4 - Call for Sites - schedule of site specific submissions**

<b>SITE REF</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Other Propsed Use</b>	<b>Site Area (approx ha)</b>	<b>Landowner</b>	<b>Known Constraints</b>	<b>Main Access</b>	<b>Further Info</b>
CFSN044	Land at The Riverside, south of Station Road, Oundle	Housing		1.3	Dr Charles Lane		Vehicular access is currently achieved off Station Road	[RNOTP 20]
CFSN045	Land adjoining The Avenue/ Chelveston Road, Stanwick	Housing	The site would be suitable for general residential development or for a bungalow development, to fulfil the need identified in the Stanwick Neighbourhood Plan.	1.2	c/o Bowbridge Land Ltd	None known. The site is extremely well-located to the built up area of the village. The frontage of the site can be significantly improved in appearance to enhance the attractiveness of the site from within the village.	Direct access is available from the site frontage with Chelveston Road/The Avenue.	
CFSN046	Land at the junction of Northampton Road and Hayway, Rushden	Housing		1.1	J L Wilson Trust	There are no known insurmountable constraints to development.	Hayway	The site is within Flood Zone 1 and therefore at the lowest risk of flood. The site is not within a Conservation Area and there are no nearby listed buildings. The site could provide a small development of up to 6 dwellings to support the growth town [SEE ALSO CFSU31]
CFSN047	Rosary Farm, Stamford Road, King's Cliffe	Employment	This site is suited to a mixed range of industrial unit	1.0	Howard Farms Ltd , West Hay Farm , Kings Cliffe , Peterborough	This is a former pig unit, with various type of redundant buildings for conversion to industrial uses	The main entrance is on to Kings Cliffe to Stamford Road	[DUPLICATE: CFSR29]

#### Appendix 4 - Call for Sites - schedule of site specific submissions

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN048	Land off Denford Road, Ringstead	Housing		1.0	Langley, Dobson & Horrell and Whittaker - c/o Agent	none to our knowledge	off Denford Road	
CFSN049	Land south of 153 Wharf Road, Higham Ferrers	Housing		1.0	Groom c/o Agent	none to our knowledge	off Wharf Road	
CFSN050	Land to the East of Orchard Lane, Kings Cliffe	Housing		1.0	Mr James Streather	Need to widen / improve Orchard Lane to give suitable access RNOTP designation as Important Open Land, although there is no public access to the land and it is well screened	From Orchard Lane	Well located close to the heart of one of the districts most sustainable villages; Development would open up the river valley with better surveillance, active frontages and would encourage its increased use for leisure / recreation [DUPLICATE: CFSR32]
CFSN051	Farm yard	Housing		1.0	J D Davies & Partners	no unsurmountable constraints	Main Street & Thurning Road	
CFSN052	Land at Tansor	Housing		1.0	Davis c/o Agent	none to our knowledge	off public highway	
CFSN053	Land off Main Street, Barnwell	Housing		0.9	Marriott c/o Agent	None to our knowledge	off Main Street	
CFSN054	Land at Manor Farm and Red House, Manor Road, Duddington	Housing		0.9	Duddington Estate	There are no known insurmountable constraints to development. Duddington Village is classed as open countryside. Access is likely to limit the extent of development.	Main Street and Green Lane	The site comprises the redundant and derelict buildings comprising the old Slaughter House, The Red House and Gardeners Cottage and the farm buildings comprising the old Manor Farmyard and the land adjoining.

**Appendix 4 - Call for Sites - schedule of site specific submissions**

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN055	Farmyard to the rear of Hillside, Brick Kiln Road, Raunds, Wellingborough, Northamptonshire, NN9 6HY	Housing	We feel that the site is suitable for residential development. The land is previously developed, currently being used by a commercial business.	0.8	Harvey Smith, 1 Chapel Street, Ringstead, Kettering, Northamptonshire, NN14 4DL	Approximately 0.71 Ha of the site can be developed, leaving around 0.12 Ha for a balancing pond.	Access is via the current access from Brick Kiln Road	Additional information is provided in a separate document
CFSN056	Land off Blatherwycke Road	Housing		0.8	Brown	none to our knowledge	off Blatherwycke Road	
CFSN057	Land south of Prebendal Green, east of Nassington Road, Yarwell	Housing		0.8	Mr. Dick Gore	No known constraints	Access would be taken off the Nassington Road along the western site boundary	The site is well related to the built form of the village, with housing to the north, gardens and outbuildings to the east, housing and a footpath to the south, and a direct highways frontage to the west.
CFSN058	Main Street Clopton	Housing		0.8	J D Davies & Partners	No unsurmountable constraints	Main Road Clopton	
CFSN059	Disused Camp site opposite Chelveston Crescent	Housing	The site has been previously developed with a number of local people able to remember housing on the site previously. It is considered to be suitable re-use of previously developed land.	0.7	Carr Farmers (Northants) Ltd, Manor Farm, Chelveston, WELLINGBOROUGH, Northamptonshire, NN9 6AR	None	Site is accessed from the road opposite Chelveston Crescent	The site has been previously developed and has in the past had housing on it. There is still concrete on the ground and building footings visible on site.
CFSN060	Rays Field	Housing		0.7	The Richardson Family		Cotterstock Road	

**Appendix 4 - Call for Sites - schedule of site specific submissions**

<b>SITE REF</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Other Propsed Use</b>	<b>Site Area (approx ha)</b>	<b>Landowner</b>	<b>Known Constraints</b>	<b>Main Access</b>	<b>Further Info</b>
CFSN061	Land and buildings at Top Farm, Blatherwycke Road, Bulwick	Housing	Proposed residential conversion and redevelopment of land and buildings	0.7	Conant Discretionary Settlement	Grade II Listed Farmhouse	Blatherwycke Road	The site is currently occupied by a range of both traditional and modern agricultural buildings [DUPLICATE: CFSR16]
CFSN062	Land to the east of Polebrook - Site B	Housing		0.7	Dr Charles Lane		Vehicular access to the site is currently achieved off Main Street	
CFSN063	Land south of Main Street (between Main Street and Southwick Road), Glapthorn, PE8 5BE	Housing		0.7	Mr. Nigel Bewick	No known constraints.	A large, existing access serves the site directly off the south side of Main Street, between 'Dalwhi	Development of the proposed site between the south side of Main Street and west of Southwick Road would allow for circa 10-15 dwellings to be built and help the village contribute to rural housing needs
CFSN064	Land north of Village Hall, Woodford Road, Great Addington	Housing		0.7	Nottingham c/o Agent	none to our knowledge	off Woodford Road	
CFSN065	Elton Estate Land West Of Broadgate Way Warmington	Housing		0.7	Sir William Proby	None	Off Broadgate Way Warmington	I can supply a plan of the proposed area
CFSN066	Elton Estate Land North of Cemetry Bradgate Way Warmington	Housing		0.6	Sir William Proby	None	Off Bradgate Way Warmington	I can supply a plan of the proposed area
CFSN067	Yard at Townsend Farm, Southwick Peterborough PE8 5BL	Housing		0.6	The Richardson family	adjacent to a Listed Building	Main Street Southwick	

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SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN068	Land off/ adjacent to Morgans Close Polebrook	Housing		0.6	Mr & Mrs R. Case	None	The Main Access would be via Morgans Close into the centre of the development site.	The site has been previously considered as a suitable residential Development site.
CFSN069	Land off Church Road, Hargrave	Housing		0.6	Horner c/o Agent	none to our knowledge	off Church Road	
CFSN070	Land off Carlow Road	Housing		0.6	Pamplin - c/o Agent	none to our knowledge	off Carlow Road	
CFSN071	Land off Main Street	Housing		0.6	Gould c/o Agent	none to our knowledge	off Main Street	
CFSN072	Kings Cliffe Endowed Primary School	Housing		0.6	Northamptonshire County Council and Trustees of Kings Cliffe Endowed School	The main school building is listed and within the Conservation Area.	From Park Street	
CFSN073	Land north of Woodbine House, Main Street, Sudborough	Housing	N/A	0.5	Mr. S Tate	No known constraints to development.	Sudborough Road	Please see attached letter from CC Town Planning submitted on behalf of Mr. S Tate.
CFSN074	Land opposite Glapthorn Primary School, Cotterstock Road, Glapthorn	Housing		0.5	KM Wilkinson & Sons	There are no known constraints..	Cotterstock Road	The site is a small part of an open arable field. It has a frontage on to Cotterstock Road which can provide a suitable access. The site is within Flood Zone 1 and at the lowest risk of flood.
CFSN075	Land west of Ham Lane, Ringstead	Housing		0.5	Yeoman c/o Agent	none to our knowledge	off Ham Lane	
CFSN076	Home Farm, Ham Lane, Ringstead	Housing		0.5	Yeoman c/o Agent	none to our knowledge	off Ham Lane	

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SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN077	Parcel fronting Cotterstock Road (land within Oundle Primary School grounds)	Housing		0.4	Northamptonshire County Council	none known	Cotterstock Road	See the representations made on behalf of NCC by us in respect of questions 5 and 29 of the Local Plan Regulation 18 consultation, 13 March 2017.
CFSN078	Roy's Land	Housing		0.4	The Richardson Family		Private track to Main street	The track is owned by the promotor
CFSN079	Land south of Church Walk	Housing		0.4	Mr Michael Day	The site is within the Environment Agency's identified flood zone 3. Part of the site is also identified as Important Open Land under saved policy EN20. The site is outside the settlement boundary in the RNOTP.	Church Walk	The site is a former haulage yard. The site currently contains a large open side agricultural building used for the storage of hay and the remaining building of the former bricketting works [DUPLICATE: CFSR28]
CFSN080	Land adjacent to Thurning Pocket Park, Winwick Road, Thurning	Housing		0.4	Messrs R & C Baxter	None	Existing gated access onto Winwick Road, Thurning.	Please refer also to further information provided by email on 12 March 2017.
CFSN081	Land at Fotheringhay	Housing		0.4	Gould c/o Agent	none to our knowledge	off public highway	
CFSN082	Elton Estate, Land east of 37 Big Green, Warmington	Housing		0.4	Sir William Proby	None	Off Big Green Warmington	I can supply a plan of the proposed area
CFSN083	Elton Estate, Land East of Buntings Lane, Warmington	Housing		0.4	Sir William Proby	None	Off Buntings Lane Warmington	I can supply a plan of the proposed area

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<b>SITE REF</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Other Propsed Use</b>	<b>Site Area (approx ha)</b>	<b>Landowner</b>	<b>Known Contraints</b>	<b>Main Access</b>	<b>Further Info</b>
CFSN084	Land off Brick Kiln Road	Housing		0.4	Mutton	none to our knowledge	off Althorpe Gardens (Bellway Scheme)	
CFSN085	Land adjacent to The Old Smithy, Pound Lane/ Oundle Road, Woodnewton	Housing		0.3	Gheney c/o Agent	none to our knowledge	off Oundle Road	[DUPLICATE: CFSR66]
CFSN086	Land off Nassington Road	Housing		0.3	Whittaker	None to our knowledge	off Nassington Road	
CFSN087	Land north of Drovers Way, Main Street, Thurning	Housing		0.2	Wood c/o Agent	none to our knowledge	off public highway	
CFSN088	Donkey Paddock	Housing		0.2	The Richardson family	None	Main Street, Southwick	
CFSN089	Land off Sulehay Road	Housing		0.2	Whittaker	None to our knowledge	off Sulehay Road	
CFSN090	Main Street Cotterstock	Housing		0.2	The Richardson Family		Main Street	
CFSN091	Land off Slipton Lane	Housing		0.2	Palmer c/o Agent	None to our knowledge	off Slipton Lane	
CFSN092	Land off Ringstead Road	Housing		0.2	Wager c/o Agent	none to our knowledge	off Station Road	
CFSN093	Land off Blatherwycke Road	Housing		0.2	Hill c/o Agent (Bletsoes)		off Blatherwycke Road	
CFSN094	Land off Bridge Street	Housing		0.2	Brown c/o Agent		off Bridge Street	
CFSN095	Land opposite Tall Trees, Main Street, Fotheringhay	Housing		0.2	Gheney c/o Agent	none to our knowledge	off public highway	[DUPLICATE: CFSR25]

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SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN096	Land at Church Farm, south of main Street, Glapthorn	Housing	The site is submitted as a small site to accommodate approximately 5 dwellings as smaller village housing on the site of the large modern barn.	0.1	G E Reading & Sons	The site is located to the rear of a listed church. However the replacement of the large span agricultural building with a more modest range or traditionally designed dwelling would be likely to improve the setting of the church.	Main street	Glapthorn Neighbourhood Plan has recently been consulted on and the site has been put forward through the Neighbourhood Plan process as a small site to accommodate a village housing scheme of 5 2 and 3 bedroom dwellings
CFSN097	Land at Brook Farm, Main Street, Lutton	Housing		0.1	Long c/o Agent	none to our knowledge	off public highway	
CFSN098	Land south of 13-17 Kettering Road, Islip	Housing		0.1	Lewis c/o Agent	none to our knowledge	off Kettering Road	
CFSN099	Land off Main Street, Slipton	Housing		0.1	Palmer c/o Agent (Bletsoes)	None to our knowledge	off Main Street	
CFSN100	Land off Luddington Road, Luddington	Housing		0.1	Ashby c/o Agent	none to our knowledge	off Luddington Road	
CFSN101	Land at Aldwinkle Road Thorpe Waterville	Housing		0.0	Dianne & Alan Roadnight	None to our knowledge	Existing Access Off Aldwinkle Road	Awaiting Pre-application response from East Northants Planning Department
CFSN102	Land behind 44, 46 & 48 Denford Road and adjacent to 19 & 20 Mountbatten Drive, Ringstead.	Housing	Currently used as an orchard		David Langley	Stream running through	Denford Road	



**Appendix 4 - Call for Sites - schedule of site specific submissions**

<b>SITE REF</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Other Propsed Use</b>	<b>Site Area (approx ha)</b>	<b>Landowner</b>	<b>Known Constraints</b>	<b>Main Access</b>	<b>Further Info</b>
CFSN103	Land to the north and west of 63 Denford Road, Ringstead	Housing	Currently used as additional garden land for 63, Denford Road and 4, Newell Road, Ringstead.		David Langley		Denford Road, Ringstead	
CFSN104	Land to the west of Southwick Road, Glapthorn (north of new Braesby Lane development)	Housing			Mr. Nigel Bewick	Flood zones 2 and 3 run along the northern boundary of the field, and represent a physical barrier to the northern potential developable area. There are no other known site constraints.	Directly off Southwick Road to the east - there is an existing field gate broadly located centrally	Planning permission has been granted on appeal for the development of the site of Braesby (see full planning permission reference 15/02079/FUL - granted via appeal APP/G2815/W/16/3149683) to the immediate south of this land
CFSN105	Land to the west of Southwick Road, Glapthorn (north of new Braesby Lane Development)	Housing			Mr. Nigel Bewick	Flood zones 2 and 3 run along the northern boundary of the field, and represent a physical barrier to the northern potential developable area. There are no other known site constraints.	Directly off Southwick Road to the east - there is an existing field gate broadly located centrally	Planning permission has been granted on appeal for the development of the site of Braesby (see full planning permission reference 15/02079/FUL - granted via appeal APP/G2815/W/16/3149683) to the immediate south of this land

**Appendix 4 - Call for Sites - schedule of site specific submissions**

SITE REF	Site Name	Proposed Use	Other Propsed Use	Site Area (approx ha)	Landowner	Known Constraints	Main Access	Further Info
CFSN106	Elton Estate, Land at Eaglethorpe, Warmington	Housing			Lady Proby	The Elton and Estate and Lady Proby would not want to pursue development of this site or the other half of WAR1 and would propose both parts should be removed from the Existing Development Plan Site Allocations	Peterborough Road Warmington	None
CFSN107	Islip Furnace West	Employment	Part of the site is long established for employment /transport related uses / HGV parking etc. It makes sense to 'round-this' use of on the remainder of the site.			There are no known environmental constraints to what is a flat level site largely hidden by mature hedges and roadside trees. A protected line of 3-4 trees part forms the eastern boundary of the site.	Kettering Road	See attached plan
ENC LAND	SITE NAME	PROPOSED USE	CURRENT STATUS			CAPACITY (housing)	SUBMITTED	NOTES
RNOTP KCF1	Industrial Units, King's Cliffe	Housing	Leased - private use			12	Already identified in Call for sites paper	
RNOTP KCF1	Kingsmead, Kings Cliffe	Small industrial units	Vacant			n/a	Already identified in Call for sites paper	Land adjacent to the industrial units - potentially suitable for small industrial units.
RNOTP THR3(3)	Chancery Lane Car Park, Thrapston		Car Park			n/a	Already identified in Call for sites paper	39 Parking Spaces

**Appendix 4 - Call for Sites - schedule of site specific submissions**

<b>SITE REF</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Other Propsed Use</b>	<b>Site Area (approx ha)</b>	<b>Landowner</b>	<b>Known Constraints</b>	<b>Main Access</b>	<b>Further Info</b>
CFSU30	St Marys Avenue, Rushden		Leased - grazing			n/a	Already identified in Call for sites paper	Previous discussions with NCC about becoming a nature reserve.
CFSR51	Dolben Avenue, Stanwick		Allotments			n/a	Already identified in Call for sites paper	Tenants given permission to use as extended garden for allotment use.
CFSN108	East Northamptonshire House, Thrapston	Housing	Council offices			1	16/03/2017	
CFSN109	The Rushden Centre, Rushden	Housing	Council offices			1	16/03/2017	
CFSN110	Industrial Units, Raunds	Housing	Leased - private use (one unit retained for storage of Council items)			9	16/03/2017	
CFSN111	Garage, Oundle	Housing	Leased - private use			1	16/03/2017	
CFSN112	The Nene Centre, Thrapston	Housing	Leased - Leisure provider			1	16/03/2017	
CFSN113	The Pemberton Centre, Rushden	Housing	Leased - Leisure provider			1	16/03/2017	
CFSN114	Splash Leisure Pool, Rushden	Housing	Leased - Leisure provider			1	16/03/2017	
CFSN115	Fineshade, Kings Cliffe		Vacant			n/a	16/03/2017	Land identified for sale. Previously used for grazing.
CFSN116	Smithfield Place, Raunds		Vacant			n/a	16/03/2017	Land identified for sale.
CFSN117	Ditchford Lakes and Meadows		Leased - Rockingham Forest Trust and Ditchford Fisheries			n/a	16/03/2017	
CFSN118	Tywell Hills and Dales		Leased - Rockingham Forest Trust			n/a	16/03/2017	
CFSN119	Stanwick Lakes		Leased - Rockingham Forest Trust			n/a	16/03/2017	

**Appendix 4 - Call for Sites - schedule of site specific submissions**

<b>SITE REF</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Other Propsed Use</b>	<b>Site Area (approx ha)</b>	<b>Landowner</b>	<b>Known Constraints</b>	<b>Main Access</b>	<b>Further Info</b>
CFSN120	Station Road, Rushden		Vacant			n/a	16/03/2017	Previously Totector Site
CFSN121	Wood Lane, Kings Cliffe		Vacant			n/a	16/03/2017	Previously used as grazing land. Unable to develop.
CFSN122	Thorpe Street, Raunds		Leased - agricultural			n/a	16/03/2017	Site of ancient settlement.
CFSN123	Shelton Road, Raunds		Leased - agricultural			n/a	16/03/2017	
CFSN124	Stanwick Road, Higham Ferrers		Leased - grazing			n/a	16/03/2017	
CFSN125	Land adjacent to A45, Stanwick		Leased - grazing			n/a	16/03/2017	
CFSN126	John Street Car Park, Rushden		Car Park			n/a	16/03/2017	98 Parking Spaces
CFSN127	Splash Car Park, Rushden		Car Park			n/a	16/03/2017	93 Parking Spaces
CFSN128	Duck Street Car Park, Rushden		Car Park			n/a	16/03/2017	81 Parking Spaces
CFSN129	Newton Road Car Park, Rushden		Car Park			n/a	16/03/2017	84 Parking Spaces
CFSN130	Sackville Street Car Park, Thrapston		Car Park			n/a	16/03/2017	44 Parking Spaces
CFSN131	Herne Park Car Park, Oundle		Car Park			n/a	16/03/2017	85 Parking Spaces
CFSN132	Rectory Road, Rushden		Car Park			n/a	16/03/2017	73 Parking Spaces
CFSN133	Rectory Road/Portland Road Rushden		Car Park			n/a	16/03/2017	19 Parking Spaces
CFSN134	Station Road, Rushden		Car Park			n/a	16/03/2017	30 Parking Spaces
CFSN135	North Street, Rushden		Car Park			n/a	16/03/2017	31 Parking Spaces
CFSN136	Crabb Street, Rushden		Car Park			n/a	16/03/2017	8 Parking Spaces
CFSN137	Church Street, Irthlingborough		Car Park			n/a	16/03/2017	59 Parking Spaces



## **ADDENDUM REPORT**

### **Planning Policy Committee – 3 April 2017**

#### **Agenda Item 5: District-wide Local Plan Part 2 – Feedback from Regulation 18 Consultation**

The Regulation 18 consultation finished at 4:30pm on Monday, 13 March. A large number of Regulation 18 consultation responses and online site submissions were received throughout 13 March.

Officers worked to collate those responses throughout 13-14 March. A small number of responses were received after the closing time, for the following reasons:

- Submitted beyond the 4:30pm deadline for the Regulation 18 consultation;
- Sent to alternative email addresses; e.g. “Planning” (Development Management) mailbox;
- Amendments to earlier submissions; or
- Full submissions, following up “holding responses” that were received during the consultation.

The Regulation 18 Consultation report (with appendices, setting out full consultation responses) was finalised by Wednesday, 15 March. Given this tight deadline, it was decided that late representations should be dealt by way of this Addendum Report. This Addendum Report relates to the following submissions:

- Three Regulation 18 responses (Sainsbury’s Supermarkets Ltd, Ringstead Parish Council, Rayner Estate);
- Eight online site submissions, received after the deadline (Lucas Land, Davidson, M M Linnell, Yeomans, Bernstein, Landscape Land and Property Ltd/ Davies and Co, Talbot, Turnbull (two sites))

#### **Late Regulation 18 consultation responses**

<b>Respondent Name (Organisation/ individual, as appropriate)</b>	<b>Question No (if specified)</b>	<b>Theme/ summary comment</b>	<b>Verbatim comment</b>
Sainsbury’s Supermarkets Ltd	Q21	Local Centres	The consultation document proposes the designation of local retail centres in Raunds, Rushden, Ringstead and Stanwick to safeguard convenience retailing or neighbourhood centres within urban areas.

<b>Respondent Name (Organisation/ individual, as appropriate)</b>	<b>Question No (if specified)</b>	<b>Theme/ summary comment</b>	<b>Verbatim comment</b>
Sainsbury's Supermarkets Ltd	Q21	Local Centres	We suggest that the existing Sainsbury's store located on High Street South in Rushden be promoted as a new local centre. The site is located adjacent to other commercial and community properties, and within walking distance of existing residential properties, and provides an important local function in meeting the day to day shopping needs of the surrounding area. Therefore, we consider that the role and function of the store should be recognised through the allocation of the store within a new local centre.
Sainsbury's Supermarkets Ltd	Q20	Managing the impact of main town centre uses beyond the town centres	The Local Plan Part 2 considers the need to set a local retail impact test threshold and proposes a threshold of 100sqm threshold for Market Towns and 500sqm threshold for Rushden.
Sainsbury's Supermarkets Ltd	Q20	Managing the impact of main town centre uses beyond the town centres	National Policy sets a threshold at 2,500sqm for retail impact assessments. However, local planning authorities are able to set local thresholds. Planning Practice Guidance notes that if Local Plans are based on meeting the assessed need for town centre uses with the sequential approach, issues of adverse impact should not arise.
Sainsbury's Supermarkets Ltd	Q20	Managing the impact of main town centre uses beyond the town centres	Local planning authorities in setting local thresholds should consider the scale of proposals relative to town centres, cumulative effects of recent developments and whether local town centres are vulnerable. There is no evidence that a new retail proposal over 100sqm in Market Towns and 500sqm in Rushden would result in a significant adverse impact on town centres local centres.
Sainsbury's Supermarkets Ltd	Q20	Managing the impact of main town centre uses beyond the town centres	Sainsbury's therefore, considers the thresholds inappropriate in response to Question 20 of the Local Plan Part 2 and considers the impact test threshold too low. We consider that the proposed impact threshold for new retail development in Market Towns and Rushden should be increased.
Ringstead Parish Council	n/a	"Call for Sites" submission	Thank you very much for giving Ringstead Parish Council the opportunity to respond to the recent online submissions for sites either side of Denford Road, Ringstead. We do not have any specific comments to make on these sites because the issues which they need to address are similar to those

**ADDENDUM REPORT: Planning Policy Committee – 3 April 2017**

Respondent Name (Organisation/ individual, as appropriate)	Question No (if specified)	Theme/ summary comment	Verbatim comment
			which affect all sites in a village of the size of ours.
Ringstead Parish Council	n/a	"Call for Sites" submission	All potential developments must be made to recognise that there are strategic issues which are already causing quality of life changes to many residents.
Ringstead Parish Council	n/a	Infrastructure/ utilities	There is an existing problem with the foul sewage system in Ringstead related to capacity, exemplified by a recent discharge of untreated sewage into Kinewell Lake, our pocket park within the Special Protection Area of the Nene Valley gravel pits.
Ringstead Parish Council	Q12	Ecosystem services	Surface water would need to be managed so that no further runoff enters the existing watercourses which have been identified as a risk to property in times of adverse weather
Ringstead Parish Council	Q5	Settlement boundaries	Many of the submissions are outside the existing settlement boundary and whatever the planning merits are, the distance to the village centre, particularly for those to the north of Ringstead, mean that there will be an increase in motorised traffic onto our narrow streets - Back Lane, High Street for example - and this is to access the village centre, as well as travelling to destinations further afield.
Ringstead Parish Council	Q32	Contingency sites	There are a number of opportunities for either brownfield sites or infill plots to come forward, in preference to extending the village beyond its current limits. The Dodson and Horrell factory site comes to mind as does perhaps the West Farm area, although this includes some valuable grassland. These should also come forward before others which have been identified in the LDF submissions.
Ringstead Parish Council	n/a	"Call for Sites" submission	The parish council must express its opposition to one site in particular. Within the Call for Sites consultation document, land off Peacock Drive and Back Lane, reference CFSR48, seems totally out of line compared with previous policies. For a developer to promote a site with the potential to add 156 houses to the northern periphery of the village would generate considerable local opposition and Ringstead would rightly believe that these numbers were far in excess of our fair share of development in East Northamptonshire. We would argue that there is far less merit on this site even than the appeal sites at Brigstock and Stanwick, neither of which are being progressed.
Rayner Estate	n/a	Consultation process	Our client's land ownership [Rayner Estate] includes the Manor Farm site identified on the attached plan, which was previously identified for a mixed use development, including expansion of the Manor School, in the Raunds Area Plan (RAP) Preferred Options Document, a plan which subsequently did not move forward to adoption.
Rayner Estate	Q25	Community infrastructure	Demand has been placed upon the Manor School as a result of recent new development in Raunds and to meet demand, the school needs to be extended. However, to enable this, the school requires additional land.
Rayner Estate	Q25	Community infrastructure	To enable the school expansion, there have been discussions with the Head Teacher to deliver a mixed use development of housing, education, community and leisure uses, which will compliment and

**ADDENDUM REPORT: Planning Policy Committee – 3 April 2017**

Respondent Name (Organisation/ individual, as appropriate)	Question No (if specified)	Theme/ summary comment	Verbatim comment
			improve the current leisure and educational uses at Manor School for the benefit of the wider town. Specifically, there is potential for a new development to be provide improved car parking and drop off for the school. We attach an initial masterplan for information.
Rayner Estate	n/a	Consultation process	A development of this site along the lines outlined, is supported by the following Development Plan Policies; Policy 10 of the North Northamptonshire Joint Core Strategy 2011– 2031; Policy 11
Rayner Estate	n/a	Housing requirements	Policy 28 requires that East Northamptonshire to provide a minimum requirement of 8,400 dwellings up to 2031 of which the minimum requirement for Raunds is 1,060. The JCS also proposes a rural housing requirement in East Northants of 820 dwellings.
Rayner Estate	Q25	Community infrastructure	The Core Planning Principles of the NPPF promote mixed use developments, whilst advocating a proactive drive to support sustainable development (including housing and infrastructure). The NPPF also requires that, “plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues.”
Rayner Estate	Q33	Evidence base	We are therefore disappointed to note the Neighbourhood Plan, as submitted, does not propose any housing allocations, stating that Raunds has taken its “share” of its housing requirements as detailed in the North Northamptonshire Joint Core Strategy 2011– 2031. We firmly disagree with this stance and question the housing numbers used and urge that the evidence base to be reviewed (Q33).
Rayner Estate	n/a	Housing requirements	The intention of the JCS Policy 11 is that the rural housing requirement should be accommodated in Part 2 Local Plans and/or Neighbourhood Plans, “through allocating land in the most sustainable locations available and/or a windfall allowance (where there is compelling evidence that this will continue to provide a reliable source of supply).” The [Raunds] Neighbourhood Plan does not take into account the rural housing requirement, nor does it provide evidence of a windfall allowance and therefore cannot be considered as planning positively to support strategic need.
Rayner Estate	Q32	Contingency sites	The Local Plan Part 2 is consequently required to meet any residual shortfall in supply at individual locations and we note that there are a number of strategic housing requirements in the District which still need to be addressed.” In light of the above, we request that the land identified at Manor Farm is considered as part of the Local Plan Part 2 to meet any residual shortfall in accordance with the NPPF.
Rayner Estate	Q5	Settlement boundaries	Additionally, we advocate the approach to distinguishing between built up areas and the surrounding rural hinterland of “deleting the previous Local Plan “red line” settlement boundaries for settlements in the Rural North (RNOTP) area, and replace these with a detailed new criteria-based policy that could also allow for Neighbourhood Plans to designate settlement boundaries.” We consider this methodology to be most consistent with the approach of presumption in favour of sustainable development.
Rayner Estate	Q16	Specialist	Furthermore, in response to Q16 we consider that the LPP2 should propose site allocations for

#### ADDENDUM REPORT: Planning Policy Committee – 3 April 2017



Respondent Name (Organisation/ individual, as appropriate)	Question No (if specified)	Theme/ summary comment	Verbatim comment
		housing provision	self/custom built housing to meet the requirements of The Self-build and Custom Housebuilding Act 2015.
Rayner Estate	Q32	Contingency sites	Given the possible shortfall in strategic housing requirements, we also highlight that contingency allocation should be made to ensure deliverable housing sites are maintained (Q32). We would be happy to put the site at Manor Farm forward for such allocations.

#### Online site submission received after 13 March 2017

Date	Site name	Location	Proposed Use	Other proposed use	Site area (approx ha)	Landowner	Known constraints	Main Access
14/03/17	Land south of Northampton Road	Rushden	Housing	Proposed Housing Allocation – East Northamptonshire Local Plan Part 2	3.01	Mrs L. Button c/o Site Promoter: Davidson Development Ltd	There are no known development constraints associated with this site which preclude development. There are a number of potential site constraints which can be robustly addressed through any future application process.	Vehicular, pedestrian and cycle access will be achieved via a junction off Northampton Road.
21/03/17	Land east of Islington, and north of A14	Thrapston	Employment		15.6	Attorneys of Mrs M M Linnell	Former quarry land	Off Islington; alternatively an easterly extension of Huntingdon Road
21/03/17	Land east of McDonalds	Raunds	Employment	Employment or Housing	2.3	Yeomans	None known	From the west via the McDonalds access road
27/03/17	Paddock to No	Titchmarsh			0.7	Mr and Mrs S		St Andrew's

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Date	Site name	Location	Proposed Use	Other proposed use	Site area (approx ha)	Landowner	Known constraints	Main Access
	71a High Street					Bernstein		Lane
30/03/17	Land south of Stanwick Road	Raunds	Housing	Mixed residential based proposal	1.4	Landscape Land and Property Ltd and Davies and Co	Grade 3 agricultural land	Currently off Chelveston Road
31/03/17	Paddock to rear of 37 London Road	Raunds	Housing		0.07	Mr + Mrs Talbot	No known constraints	Existing shared access runs between number 35 and 37 London Road
31/03/17	Land south of Raunds Road	Stanwick	Housing		1.9	Mark Turnbull		There is existing access from Chelveston Road to land further south which could be extended through the site
31/03/17	Land North of Chelveston Road	Raunds	Housing		2.85	Mark Turnbull		There is existing access from Chelveston Road to land further east which could be extended through the site