



**Planning Policy Committee
30th July 2018**

Scope setting for the Local Plan Part 2

Purpose of report

Significant progress has been made over the past year in the preparation of Neighbourhood Plans covering a range of Parish areas across the District, which has direct implications for the Local Plan Part 2.

In order to define the scope for the Local Plan Part 2, a decision is sought regarding those themes or topics which are better addressed through Neighbourhood Plans, those themes and topics which are better addressed through the Local Plan Part 2 and those themes and topics which could be covered by either.

This will enable the scope and structure of the Local Plan Part 2 to be set,, within which a framework of policies can then be developed.

Attachments

Appendix 1: Scoping Assessment for Local Plan Part 2

Appendix 2: Draft structure/ framework for East Northamptonshire District-wide Local Plan Part 2

1.0 Background

1.1 Over the past 12-18 months, substantial progress has been made in bringing forward Neighbourhood Plans. The following Neighbourhood Plans have now been “made” (adopted) as part of the statutory development plan:

- Chelveston cum Caldecott Neighbourhood Plan 2016-2031, “made” July 2017;
- Glapthorn Neighbourhood Plan 2016-2031, subject of a separate report (Agenda Item 9);
- Higham Ferrers Neighbourhood Plan 2011-2031, “made” April 2016;
- Raunds Neighbourhood Plan 2011-2031, “made” November 2017
- Rushden Neighbourhood Plan, “made” 4 June 2018; and
- Stanwick Neighbourhood Development Plan 2016-2031, “made” July 2017.

1.2 In addition, several other draft Neighbourhood Plans are published or have achieved various stages in the plan-making process. The following Plans have reached the 1st draft stage of preparation; Neighbourhood Planning (General) Regulations 2012, as amended (Regulation 14):

- Brigstock Neighbourhood Plan – submitted March 2018; currently under Examination;
- Barrowden and Wakerley Neighbourhood Plan 2016-2036 – 1st draft (Regulation 14) version, April 2018;
- King’s Cliffe Neighbourhood Plan – 1st draft (Regulation 14) version, July 2017.

- 1.3 These “made” and emerging Neighbourhood Plans all cover a varied range of themes and topics which would otherwise be covered through the Local Plan Part 2. The North Northamptonshire Joint Core Strategy (JCS) 2011-2031 (Local Plan Part 1), adopted July 2016 specifies a range of themes and topics which could be covered either through the Local Plan Part 2 or (if being prepared) a Neighbourhood Plan.
- 1.4 These issues informed the “Regulation 18” consultation for the Local Plan Part 2, the findings of which were considered by the Planning Policy Committee on 3rd April 2017, and subsequent stakeholder workshops (May 2017 – April 2018). Direction is now sought, to finalise the themes or topics that ought to be covered by the Local Plan Part 2, and those which should be delegated to Neighbourhood Planning. This, in turn will enable the scope for the Local Plan Part 2 to be refined.
- 1.5 This report therefore identifies and recommends those themes or topics which are ideally best addressed through the Local Plan Part 2, together with those which should be delegated to Neighbourhood Plans.

2.0 The Local Plan Part 1 (JCS)

- 2.1 The JCS already provides substantial detail, including site specific proposals (Rockingham Enterprise Area, Rushden East and Rushden Gateway). It sets out a broad range of strategic policies and proposals, as follows:
- Core policies (Part A) – Development management policies; e.g. for protecting and enhancing assets and provision of infrastructure;
 - Spatial policies (Part B) – Spatial development strategy (urban/ rural), connectivity, green infrastructure, economic prosperity, housing; and
 - Strategic site specific policies (Part C) – Including Rushden East and Nene Valley Farm/ Rushden Gateway.
- 2.2 The JCS defines a series of policy “hooks” throughout. These enable the Local Plan Part 2 and/ or Neighbourhood Plans to set out additional local direction where desirable; applying JCS policies at a District (Local Plan Part 2) or Parish (Neighbourhood Plan) level.
- 2.3 Further policy guidance is set out in the National Planning Policy Framework (NPPF), though it is recognised that a revised NPPF will be published at the end of July by Central Government, which will have implications for plan making, and need to be taken on board in producing the Local Plan Part 2.

3.0 Collating Regulation 18 consultation responses and feedback from Member Workshops, Town and Parish Council Workshops (November 2016 – April 2018)

- 3.1 The Regulation 18 consultation responses were reviewed and summarised, and presented to the Planning Policy Committee on 3rd April 2017 for approval. Through a series of 34 questions, officers have considered the responses and views expressed during the consultation. These will inform the scope of the Local Plan Part 2; i.e. the detailed structure, and what themes or topics it should cover.
- 3.2 The series of Member and Town/ Parish Council Workshops held between May 2017 and April 2018 have enabled further direction to be given to the scope of the Local Plan Part 2. Through the workshops, priority themes and topics have also been identified, through active engagement between Members, Town/ Parish Councillors and officers.

3.3 The publication and making of Neighbourhood Plans has implications for the production of the Local Plan Part 2. The NPPF expressly states that:

“Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation” (2012 NPPF, paragraph 185).

In other words, the Local Plan Part 2 must complement adopted and emerging Neighbourhood Plan policies and, as far as possible, should avoid undermining these.

3.4 **Appendix 1** provides a review of the Regulation 18 consultation questions, regarding the potential scope for the Local Plan Part 2 (Q2-Q32). This identifies three broad categories of policy which will, in turn guide the contents of the Local Plan Part 2:

- JCS (Local Plan Part 1), where specific policies provide detailed development management criteria; e.g. Protection of community assets/ infrastructure (Policy 7), Renewable Energy (Policy 26) and Gypsies and travellers (Policy 31);
- Themes/ topics best covered by Neighbourhood Plans; and
- Themes/ topics to be addressed through the Local Plan Part 2.

4.0 Themes/ topics addressed/part covered by the JCS and/ or Neighbourhood Plans

4.1 Appendix 1 provides background evidence considered through the Regulation 18 process which asked a series of questions relating to future policy formulation and content. . Much of this assessment reviews both the range of themes and topics covered by policy documents including Neighbourhood Plans, and the extent to which the Local Plan Part 2 could add value to adopted JCS policies.

4.2 The assessment has identified a number of policy areas that are considered to be adequately addressed. The themes or topics set out below are therefore proposed to be best covered through the JCS and/ or Neighbourhood Plans.

4.3 **Open space, sport and recreation site designations** – The JCS (Policy 7) sets out criteria for the protection of existing community facilities and open space. All Neighbourhood Plans produced so far make designations/ allocations for priority community facilities and open spaces that should be protected.

4.4 **Trees and ecosystem services** – The JCS contains a whole range of policies for protecting and enhancing the natural environment (1-4, 8, 19-21). Furthermore, the Neighbourhood Plans produced so far include detailed policies relating to features such as street trees, and apply the strategic policies at a local level.

4.5 **Landscape designations** – The JCS provides a “hook” (Policy 3(d)), to allow for the Local Plan Part 2 and/ or Neighbourhood Plans to identify areas to maintain the separate identities of settlements and prevent coalescence. Recently produced Neighbourhood Plans (Glaphorn and Stanwick) have both sought measures to resist coalescence with their urban neighbours (Oundle and Raunds, respectively), it is considered appropriate for such issues to be addressed locally by way of Neighbourhood Plans. The Local Plan Part 2 will, however, provide the opportunity to consider whether this remains an issue where Neighbourhood Plans are not being prepared.

4.6 **Renewable energy** – The JCS sets out detailed development management criteria to help determine proposals for new renewable energy schemes (Policy 26). This is

supported by the Council's adopted Wind and Solar Energy Supplementary Planning Document. It is considered that sufficient guidance therefore exists and that there is little or nothing that the Local Plan Part 2 could add to the adopted policy direction.

- 4.7 **Gypsies, travellers and travelling showpeople** – The JCS sets out detailed development management criteria to determine proposals for Gypsy, traveller, or travelling showpeoples' sites (Policy 31). Work is currently being undertaken to update the Gypsy and Traveller Accommodation Assessment. The outcome of this work is not known at present, however it is anticipated that future provision could form part of a separate Development Plan Document, possibly taking on board the wider requirements for the North Northamptonshire area. No sites were submitted through the recent "Call for sites" (alongside the Regulation 18 consultation).
- 4.8 **Mix and balance of uses within town centres** – The possibility of setting "saturation" policies to manage the range and mix of main town centre uses was considered through the Regulation 18 consultation. The three urban Neighbourhood Plans produced to date (Higham Ferrers, Raunds and Rushden) all contain detailed policies for managing the range of uses in town centres. Whilst it is considered that local (town-specific) standards can be set through Neighbourhood Plans, Irthlingborough, Oundle and Thrapston for example do not have Neighbourhood Plans in place, indeed not all areas are producing Neighbourhood Plans and not all Plans address town centre issues therefore the Local Plan Part 2 will need to address this issue where appropriate.
- 4.9 **Community infrastructure** – The JCS (policies 7 and 10) sets out generic criteria for the protection of existing, and provision of new, community infrastructure. All Neighbourhood Plans produced so far make designations/ allocation for priority community facilities that should be protected, together with local infrastructure priorities. It is not anticipated that the Local Plan Part 2 will need to provide additional guidance to that set out in the JCS.
- 4.10 **Major/strategic site specific proposals** – Whilst the JCS contains site specific policies for proposed allocations at – Tresham Garden Village (Policy 14), Rockingham Enterprise Areas (Policy 27), Rushden East (Policy 33) and Rushden Gateway (Policy 34) detailed guidance will need to be provided through Masterplans and associated supporting documents. There are however additional sites that would benefit from further policy guidance, for example Nene Park at Irthlingborough. The Local Plan Part 2 will therefore provide policy direction for any such identified sites as appropriate.
- 5.0 Themes/ topics to be addressed through the Local Plan Part 2**
- 5.1 The policies of the JCS and the range of themes and topics covered by those Neighbourhood Plans produced so far, enable the scope for the Local Plan Part 2 to be refined. Priority themes and topics for the Plan are set out below. These are specified with reference to the assessment at Appendix 1.
- 5.2 **Vision and Outcomes/ presumption in favour of sustainable development** – A key element of the Local Plan Part 2 is defining a detailed Vision and priority outcomes. The JCS provides some strategic guidance, although the Local Plan Part 2 must seek to apply these in the spatial District/ sub-District context. Certain themes (e.g. climate change) could be addressed through a District-level presumption in favour of sustainable development where JCS Policy 1 is not deemed to provide sufficient direction.
- 5.3 **Rural settlement hierarchy** – The JCS (Table 1/ Policy 11) provides an overarching spatial development strategy, including a two-tier settlement hierarchy for the urban

areas. The Local Plan Part 2 will need to provide further direction for the rural area; e.g. defining settlements that should be regarded as “Villages”, together with smaller rural settlements or hamlets that should be regarded as “Open Countryside”.

- 5.4 **Settlement boundary criteria** – Supporting the settlement hierarchy, settlement boundaries may be applied to provide clarity and direction in differentiating between built up areas and the rural hinterland beyond. The JCS provides some overarching/ generic criteria for designating settlement boundaries (paragraph 5.17); although it is considered that more detailed criteria would need to be set through the Local Plan Part 2. The definition of boundary lines on the Policies Map is a non-strategic/ site specific matter and, as such, is best addressed through Neighbourhood Plans.
- 5.5 **Historic environment** – There is a need to address these issues at a local level through the Local Plan Part 2, for example through setting out more clearly the policy approach for defining both designated and non-designated heritage assets.
- 5.6 **Town centre re-imagination** – Delivering enhancements to, and “re-imagination” of, existing town centres was a feature of the Rural North, Oundle and Thrapston Local Plan, with reference to Thrapston. Neighbourhood Plans produced for Higham Ferrers, Raunds and Rushden have provided some guidance, however, the Local Plan Part 2 may be a key mechanism for developing a policy framework for securing future town centre action plans.
- 5.7 **Re-using rural buildings and redevelopment in the open countryside** – Existing plan policies include detailed development management guidance for the re-use and replacement of existing dwellings in the open countryside, away from established settlements. In some cases, Neighbourhood Plans (e.g. Chelveston cum Caldecott and Glapthorn) set out detailed local criteria-based policies for re-using rural buildings, which provide additional local direction to JCS Policy 25 (Rural Economic Development and Diversification). By contrast, no Neighbourhood Plans produced so far include policies for replacement dwellings in open countryside. It is therefore considered that the Local Plan Part 2 will need to review and update the existing policy.
- 5.8 **Local Green Space (LGS) criteria** – The NPPF (paragraphs 76-78) provides detailed national criteria for designating LGS. These emphasise the importance of individual sites to the locality/ local community; i.e. where a site is considered to be of sufficient local importance, its designation as LGS should be sought through a Neighbourhood Plan. There may be an opportunity for the Local Plan Part 2 to set out more detailed policy direction for designating LGS through Neighbourhood Plans; e.g. a local definition for an “*extensive tract of land*” (NPPF paragraph 77).
- 5.9 **Green infrastructure policies and projects** – The Local Plan Part 2 will need to review existing linear green infrastructure proposals and determine what other schemes could be designated; e.g. in the south of the District. Due to the extensive/ linear nature of green infrastructure corridors, these would need to be designated through the Local Plan Part 2. Commissioned work is currently being undertaken on a Green Infrastructure Plan to inform the approach.
- 5.10 **Housing requirements** – With the exception of Oundle, the housing requirements set out in JCS Policy 29/ Table 5 are already being met by existing commitments or (in the case of Rushden) through Neighbourhood Plan allocations. The Local Plan Part 2 is now running ahead of the Oundle Neighbourhood Plan and it will be necessary to allocate land through the Local Plan Part 2 to fulfil the outstanding residual requirement for the town (this currently equates to approximately 300 dwellings which would thereby ensure the minimum strategic level of housing requirements were delivered as required through the JCS Policy 28).

- 5.11 **Housing mix and tenure** – JCS Policy 30 provides the overall requirements for affordable housing delivery and house sizes. Where further policy detail (e.g. sub-district/ multi-Parish/ Ward standards) is deemed necessary, this strategic direction will need to be set through the Local Plan Part 2.
- 5.12 **Specialist housing provision** – The JCS (Policy 30) provides some direction for delivering specialist housing. However, this only provides a strategic view across North Northamptonshire and does not address local matters of detail and a more localised approach for particular types or tenures and specialised housing delivery is required to build on developing evidence bases, for example relating to older persons housing and self and custom build housing. This issue will need to be addressed through the Local Plan Part 2.
- 5.13 **Town centre boundaries and primary shopping areas** – Neighbourhood Plans have already defined town centre boundaries and/ or primary shopping areas for Higham Ferrers, Raunds and Rushden. Designations for Oundle and Thrapston, and new designations for Irthlingborough town centre will need to be made through the Local Plan Part 2.
- 5.14 **Managing the impacts of main town centre uses beyond the town centres** – Concerns have been raised about the impacts of out of town/ out of centre retailing upon existing town centres. One way that these effects could be better managed is by setting local impact test thresholds; i.e. below the national standard. Neither the JCS (Policy 12), nor published Neighbourhood Plans, have sought to address this issue. It is considered that local impact test standards could be set out in the Local Plan Part 2.
- 5.15 **Local centres** – The presence of local hubs of main town centre uses beyond the six town centres could also be recognised through the Local Plan Part 2. Such designations could be made through Neighbourhood Plans although, to date, no published Plans have done so. Local centres have a significant impact on the local economic base, so it may be appropriate to designate specific centres, as allowed for in JCS Policy 12(g).
- 5.16 **Existing employment areas** – The JCS (Policy 22(c)) allows for established employment areas to be safeguarded through the Local Plan Part 2 and/ or Neighbourhood Plans. The Minerals and Waste Local Plan and most published Neighbourhood Plans include protected/ safeguarded employment area designations. Work has been commissioned to undertake an employment land assessment and the findings of this report will need to be taken into account to ensure comprehensive coverage across the District. The Local Plan Part 2 will then be able to designate protected employment areas and consider where land release may be appropriate.
- 5.17 **Potential to allocate further employment land allocations** – There are currently more than enough major committed sites to deliver (and significantly exceed) the JCS jobs requirement (7300 dwellings; JCS Policy 22(d)/ Table 3). Therefore there is no requirement to allocate further strategic employment sites through the Local Plan Part 2..
- 5.18 **Tourism and culture** – Tourism is recognised through both the JCS and Economic Development Strategy as a priority economic sector. This strategic priority should be recognised through the Local Plan Part 2, which could allocate specific sites to deliver enhancements to the tourist offer; e.g. additional tourist accommodation.
- 5.19 **Health and wellbeing** – The Regulation 18 consultation highlighted a need to provide more strategic direction through the Local Plan Part 2, going beyond the criteria based

policies (e.g. Policy 8) in the JCS. Statutory consultees (i.e. Sport England, County Council) have emphasised this issue, and it is recognised that provision must therefore be made in the Local Plan Part 2.

- 5.20 **Site specific allocations** – Further housing land allocations will need to be made at Oundle, as indicated at paragraph 5.10 of this report. The Regulation 18 consultation also considered the need to provide for contingency (or reserve) sites through the Local Plan Part 2, in the event that the major developments do not come forward as planned.

6.0 Conclusion

- 6.1 The Local Plan Part 2 needs to set out additional District-level and/ or site specific direction where needed to add value to the JCS policies. It also needs to complement and support Neighbourhood Plans, where these are “made” (adopted) or under preparation.

- 6.2 This report sets out a numbers of considerations for defining the scope (range of themes and topics) of the Local Plan Part 2, taking into account evidence gathered to date including the findings of the Regulation 18 consultation (Appendix 1). It also identifies those themes and topics that could best be addressed through Neighbourhood Plans. As the draft Plan progresses, it may be that some of the stated themes (section 5.0, above) do not ultimately require a specific policy in the Local Plan document.

- 6.3 The review has enabled a draft structure/ framework for the Local Plan Part 2 to be developed (**Appendix 2**). This will provide the main framework for drafting the policies and text of the Plan.

7.0 Equality and Diversity Implications

- 1.1 There are no equality and diversity implications arising from this report. The Local Plan Part 2 will need to undergo Equalities Impact Assessment screening as an integral part of the Plan preparation process.

9.0 Legal Implications

- 9.1 There are no legal implications arising from this report.

10.0 Risk Management

- 10.1 There are no significant risks arising from this report.

11.0 Resource and Financial Implications

- 11.1 There are no resources or financial implications arising from this report.

12.0 Constitutional Implications

- 12.1 There are no constitutional implications arising from this report.

13.0 Customer Service Implications

- 13.1 There are no customer service implications arising from this report.

14.0 Privacy Implications

14.1 There are no issues arising from the report.

15.0 Corporate Outcomes

15.1 The relevant Corporate Outcomes are:

- Good Quality of Life – Prosperous and Sustainable: Regeneration and Economic Development, Sustainable Development, High Quality Built Environment
- Effective partnership working
- Effective management

16.0 Recommendations

16.1 Members are asked to approve the following:

(1) Agree the following themes and topics identified through the Scoping Assessment (Appendix 1) which are considered appropriate to be covered by the District-wide Local Plan Part 2 (section 5.0, above); thereby defining the scope of the Plan:

- Vision and Outcomes/ presumption in favour of sustainable development
- Rural settlement hierarchy
- Settlement boundary criteria
- Town centre re-imagination
- Re-using rural buildings and redevelopment in the open countryside
- Local Green Space criteria
- Green infrastructure policies and projects assessment
- Housing requirements
- Housing mix and tenure
- Specialist housing provision
- Town centre boundaries and primary shopping areas
- Managing the impacts of main town centre uses beyond the town centres
- Local centres
- Existing employment areas
- Assessment of existing employment areas Tourism and culture
- Health and wellbeing
- Site specific allocations

(2) To agree the draft structure/ framework for the District-wide Local Plan Part 2 (Appendix 2).

(Reason – to set the detailed scope and structure for the emerging District-wide Local Plan Part 2)

Legal	Power: Town and Country Planning (Local Planning) (England) Regulations 2012 Planning and Compulsory Purchase Act 2004				
	Other considerations: National Planning Policy Framework North Northamptonshire Joint Core Strategy 2011-2031, adopted July 2016 (Local Plan Part 1)				
Background Papers: None					
Person Originating Report: Richard Palmer Planning Policy and Conservation Manager ☎ 01832 74(2142) ✉ rpalmer@east-northamptonshire.gov.uk					
Date: 23 July 2018					
CFO		MO		CX	

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q02	Vision and Outcomes	Q2 considered whether it is necessary to develop spatial sub-areas within the District; i.e. a more detailed District-level spatial vision.	The Regulation 18 consultation revealed a desire for the Plan to give greater recognition to maintaining sustainable rural communities. Respondents also highlighted a need to consider the varied characters of individual settlements and their broader relationships. This is an issue that relates to the geographical and spatial character of the District. The JCS (Local Plan Part 1) already sets a clear differentiation between "urban" and "rural". The A14 is recognised as providing a physical distinction between the (predominantly rural) "Rural North" and (predominantly urban) south. Such issues of spatial planning go far beyond single Parish matters and, as such, could only be appropriately addressed through the Local Plan (in this case, Local Plan Part 2).	Local Plan Part 2 (LPP2)
Q03	Presumption in favour of sustainable development	Q3 sought views as to whether further local direction is necessary through the LPP2, over and above the Joint Core Strategy (JCS) Policy 1, with respect to the "Presumption in favour of sustainable development"	Regulation 18 respondents were divided. Some argued that Policy 1 is sufficient, but others proposed that greater emphasis could be placed upon climate change in a local context. On this basis, it may be appropriate to develop a further distinctive LPP2 policy, with a particular focus upon addressing the implications of climate change at a District level.	Local Plan Part 1 (LPP1) - North Northamptonshire Joint Core Strategy (JCS), cross referenced from LPP2
Q04	Settlement hierarchy	Q4 considered whether it is appropriate for the LPP2 to define a more detailed rural spatial approach through an enhanced settlement hierarchy for the villages	Regulation 18 respondents views were varied, although the majority argued that it is necessary for the LPP2 to include a more detailed rural settlement hierarchy. This is an issue that relates to the geographical and spatial character of the District and, as such, could only be appropriately addressed through the Local Plan. The overall view, expressed through the Regulation 18 consultation, is that a more detailed rural settlement hierarchy should be defined through the LPP2.	LPP2
Q05	Settlement boundaries	Several differing opinions were expressed through the Regulation 18 consultation regarding the LPP2 approach to settlement boundaries.	It should be noted that, of the eight Neighbourhood Plans that have reached the 1st draft stage, all but two designate linear settlement boundaries. Those for the north of the District (Brigstock, Glapthorn and King's Cliffe) have all reviewed outdated boundaries from the existing LPP2 (the Rural North, Oundle and Thrapston Plan/RNOTP), with these RNOTP boundaries used as a starting point. The JCS (paragraph 5.17) sets out overall generic criteria, but it is recognised that, at the very least, a more detailed framework should be set through the LPP2.	Overarching framework set through LPP2; linear village boundaries could then be set through Neighbourhood Plans

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
			<p>The Higham Ferrers and Raunds Neighbourhood Plans do not define linear settlement boundaries. The Higham Ferrers Neighbourhood Plan uses written criteria, while the Raunds Neighbourhood Plan does not cover this issue. By contrast, the Rushden Neighbourhood Plan does define a linear settlement boundary for the main urban area. Given these differing approaches, it is considered appropriate for the LPP2 and/ or Neighbourhood Plans set clear settlement boundary criteria to allow for differentiation between "urban" (JCS Policy 11(1)) and "rural" (Policy 11(2)) areas.</p>	<p>Overarching framework set through LPP2; linear boundaries for the urban areas could then be set through Neighbourhood Plans</p>
Q06	Historic environment	<p>While listed buildings are protected by separate legislation, Q6 considers the role of the LPP2 with respect to non-designated heritage assets; namely preparation of a "local list".</p>	<p>The Regulation 18 views were interesting; insofar as Town/ Parish Councils support the preparation of a District-wide list, with the option for Neighbourhood Plans to expand this. By contrast, heritage bodies (NCC, Historic England, National Trust) consider that a criteria based approach is more flexible with Neighbourhood Plans providing an option to develop bespoke local lists. Furthermore, most Neighbourhood Plans produced so far already include a local list, so it is considered that the LPP2 may provide District-level direction for producing local lists, which could then be set by Neighbourhood Plans.</p>	<p>Overarching framework/ criteria set through LPP2; local lists could then be made through Neighbourhood Plans</p>
Q07	Town Centre Regeneration	<p>Priority regeneration sites at Irthlingborough and Thrapston were noted for the Regulation 18 consultation. Q7 considered whether other sites should also be identified through the LPP2.</p>	<p>Other town centres (Higham Ferrers and Rushden) have been the subject of Regeneration Masterplans (2005 and 2010 respectively). In these cases, the respective Neighbourhood Plans (together with that for Raunds) have considered approaches for town centre regeneration (or "re-imagination"). This is a focus for the Raunds Neighbourhood Plan, although the "made" Higham Ferrers Plan seeks to manage the range of uses within the town centre, while town centre regeneration does not feature prominently in the Rushden Neighbourhood Plan. There is also uncertainty as to if/ when Neighbourhood Plans for Irthlingborough and Thrapston may come forward; therefore there is a significant role for the LPP2 in promoting town centre regeneration, especially in the cases of Irthlingborough, Rushden and Thrapston.</p>	<p>LPP2 (focus upon Irthlingborough, Rushden and Thrapston "re-imagination")</p>

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q08	Re-using rural buildings and redevelopment in the open countryside	Q8 considers how existing (pre-NPPF) policy criteria for the re-use or replacement of rural buildings should be updated to reflect current national (NPPF) policy	JCS policies 13 and 25 already contain broad criteria for the re-use of rural buildings. Q8 respondents considered that policies 23, 24 (RNOTP) and AG9 are broadly NPPF compliant. That said, Neighbourhood Plans for some rural parishes (e.g. Chelveston, Glapthorn) include more detailed rural diversification policies, while others do not. Furthermore, no Neighbourhood Plans so far include policies for replacement dwellings in open countryside. Therefore, it is entirely appropriate to review existing Local Plan policies for the re-use of rural buildings and replacement dwellings through the LPP2.	LPP2 (except for Chelveston cum Caldecott and Glapthorn)
Q09	Open space, sport and recreation site designations	Q9 considers how the the findings of the KKP open space assessment can be applied for the LPP2. Specifically, whether the use of zonal open space designations are still appropriate.	A major role of the LPP2 is setting site specific policies. The previous LPP2 (RNOTP) designated open space, sports and recreational sites across the Plan area (based on the 2006 PMP study). In practice the KKP study will replace its predecessor as the primary open space assessment for the District. While Neighbourhood Plans may designate public open spaces and/ or community facilities within their own area (all published Neighbourhood Plans have done so), it is useful to be able to reconcile local proposals with the District-wide (KKP) evidence base. Given the popularity of Neighbourhood Plans and the need to ensure sufficient flexibility, there may be an argument that JCS Policy 7 already provides robust policy criteria for protecting open spaces. Where supported locally, these may then be designated through Neighbourhood Plans.	Local Plan Part 1 (LPP1) - North Northamptonshire Joint Core Strategy (JCS), with Neighbourhood Plans (site specific proposals)
Q10	Local Green Space	Q10 considers the role of the LPP2, with reference to the designation of Local Green Space (LGS), the national (NPPF paragraphs 76-78) protected open space designation	Views varied through the Regulation 18 consultation. Some respondents argued that key sites should be designated through the LPP2, with additional sites (with local support) designated by way of Neighbourhood Plans. However, the NPPF (paragraph 77) criteria refer to LGS as being "demonstrably special to a local community". Inference could be drawn from this that the NPPF envisages that, in practice, this criterion could only be practically applied by way of a Neighbourhood Plan designation. At a District LPP2 level it would be extremely challenging to conclude that this criterion could be met, although there could be a case to apply the NPPF criteria in the context of East Northamptonshire.	Neighbourhood Plan (LPP2 to set further local criteria for designating LGS; applying NPPF paragraph 77 to ENC context)

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q11	Green infrastructure policies and projects	Q11 considers opportunities to promote site specific green infrastructure proposals through the LPP2 and review existing proposals (i.e. RNOTP)	The current LPP2 contains a substantive list of site specific (linear) green infrastructure (GI) proposals. These, together with the JCS GI corridors (Figure 17), provide a comprehensive framework for the Local Plan period. It is important to consider whether the RNOTP proposals (policies 4 and 10) remain appropriate and whether other specific proposals could be considered through the LPP2. Given the cross boundary nature of linear GI corridors, these are not matters that could practically be addressed through Neighbourhood Plans.	LPP2
Q12	Trees and ecosystem services	By way of Q12, the LPP2 could consider how to develop the concept of ecosystem services (JCS Policy 1) in an East Northamptonshire context	The JCS already sets out an extensive range of policy criteria relating to many aspects of ecosystem services, including place shaping (Policy 8), historic environment (Policy 2), landscape (Policy 3) and biodiversity (Policy 4). Bespoke spatial policies regarding the Nene Valley and Rockingham Forest (policies 20 and 21 respectively) provide extensive direction. It must also be borne in mind that "made" Neighbourhood Plans (e.g. Higham Ferrers and Stanwick) contain locally distinctive policies to encourage the retention of trees as one distinct approach to delivering ecosystem services. All in all, the JCS provides extensive direction, while Neighbourhood Planning offers an opportunity to encourage and support local initiatives to deliver ecosystem services.	JCS and Neighbourhood Plans
Q13	Landscape designations	Q13 considers whether the LPP2 could designate further landscape zones, to address issues such as coalescence or tranquillity	The JCS (Policy 3) already designates an extensive tranquillity zone, covering significant parts of the rural north area. Policy 3 also provides a policy "hook" to allow for the designation of further areas. Meanwhile, the "made" Stanwick Neighbourhood Plan designates a "strategic gap", to resist coalescence with Raunds. The draft Glapthorn Neighbourhood Plan proposes a similar "area of separation" between Glapthorn and Oundle, although this raises issues due to its geographical extent. In practice, where additional local landscape designations are deemed necessary these may be identified locally and promoted through Neighbourhood Plans.	JCS and Neighbourhood Plans

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q14	Renewable energy	The JCS (Policy 26) already sets out detailed development management criteria for renewable energy schemes, although it is necessary to consider whether further local direction is required through the LPP2.	The JCS renewable energy policy (26) was assessed in detail through the Examination process (2015-16). It underwent a number of changes, to ensure that the criteria are as robust as these could be. It also provides a policy "hook" for the Wind and Solar energy SPD, adopted September 2014. Policy 26 and the SPD provide extensive policy direction regarding the development of renewable energy schemes. As such, it is hard to envisage where further policy direction could possibly be required through the LPP2. Furthermore, due to the inevitably extensive matter of landscape sensitivity, such issues could not realistically be addressed through a Neighbourhood Plan.	JCS (Policy 26, supported by Wind and Solar Energy SPD)
Q15	Housing requirements	The residual housing requirements for the LPP2 would entail further "strategic" housing land allocations at Oundle and Rushden, in order to meet the JCS targets (policies 28 and 29)	The current housing land supply was agreed by the Planning Policy Committee on 27 November 2017. Recently, the draft Rushden Neighbourhood Plan was "made" (4 June 2018). This Plan identifies a number of sites within the urban area, which are expected to virtually all of the residual requirement for the town. Questions still remain about progress with Oundle Neighbourhood Plan; therefore if there is no prospect of submission by early-2019 it will be necessary to include further allocations within the LPP2 to fulfil the current requirement (up to 300 dwellings) for the town.	LPP2
Q15	Housing mix and tenure	Q15 considers ways that the overarching JCS Policy 30 affordable housing and size thresholds could be applied at the local (e.g. sub-District) level	Delivery of affordable housing is a strategic matter. While Neighbourhood Planning provides an opportunity to identify bespoke local (ward/ parish) level need, other issues such as District-level standards for specific housing mixes and tenures (those not covered by JCS Policy 30) are strategic matters and, as such, could only be realistically addressed through the LPP2.	LPP2
Q16	Specialist housing provision	Q16 recognises the need to consider potential opportunities for the LPP2 to make site specific allocations for specialist housing schemes	The LPP1 (JCS Policy 30(g)) includes generic criteria to support the development of custom/ self-build schemes. Policy 14 also makes a specific requirement to designate custom/ self-build plots at Tresham Garden Village (14(f)). Neighbourhood Planning may offer further opportunities to develop bespoke specialist housing schemes to serve a locality (individual Parish area). Overall, the JCS already contains specific criteria for custom/ self-build housing. By contrast, specific local housing needs assessments may enable site specific allocations to be made through Neighbourhood Plans, in order to deliver a particular specialist housing scheme to address a local need. It would, however, be extremely challenging to undertake a robust District-level site selection process; balancing local aspirations and the adopted spatial strategy (JCS Policy 11).	Neighbourhood Plans (supported by local assessments of housing need)

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q17	Gypsies, travellers and travelling showpeople	Q17 considers the need for the LPP2 to make site specific allocations for Gypsy/ traveller sites, in light of the identified need set out in JCS Table 7	<p>The LPP1 includes the criteria-based Policy 31 for assessing applications for new Gypsy and traveller sites. It does, however, include a specific requirement for the LPP2 to allocate sites to meet the outstanding need. Table 7 specifies a small residual requirement for additional residential (7 No), transit (3 No) and travelling showpeoples' (4 No) pitches/ plots. However, this only makes provision for the period to 2022; i.e. the LPP2 may still need to make provision to cover the remaining 9 years of the Plan period. That said, the Regulation 18 consultation/ call for sites did not give rise to further site specific proposals. In this regard it may be assumed that any further need would be extremely limited and small scale; such that forthcoming proposals may be addressed through the development management process, with reference to Policy 31.</p>	JCS
Q18	Town centre boundaries and primary shopping areas	Q18 considers the NPPF requirement (paragraph 23) for Local Plans to designate town centre boundaries and primary shopping areas	<p>National policy (NPPF paragraph 23) specifically requires that town centre boundaries and primary shopping areas be defined in Local Plans/ site specific development plan documents. The Higham Ferrers, Raunds and Rushden Neighbourhood Plans all include relevant designations. Furthermore, the current LPP2 (RNOTP, adopted July 2011) includes these designations for Oundle and Thrapston. Out of six town centres, three have Neighbourhood Plans that explicitly cover the NPPF requirements. However, there is no certainty that Neighbourhood Plans for Irthlingborough, Oundle and Thrapston will come forward; in which case the LPP2 must look to review the RNOTP designations and designate boundaries/ primary shopping areas for Irthlingborough.</p>	LPP2 - Irthlingborough, Oundle, Thrapston

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q19	Mix and balance of uses within town centres	Q19 considers how to ensure that town centres retain a balanced mix of uses, to ensure their vitality and viability, avoiding the saturation/ over-concentration of single types of use/ business	<p>The LPP1 (Policy 12) contains policy criteria regarding the spatial strategy for town centres; Rushden and Wellingborough (Growth Towns; 12(d)) and the Market Towns (12(f)). Policy 12 allows for the LPP2/ Neighbourhood Plans to set their own local strategies or site specific allocations for town centre uses. The published Higham Ferrers, Raunds and Rushden Neighbourhood Plans all set their own approaches to managing the range of uses and businesses within their respective town centres. Furthermore, all six town centres have their own character, function and range of businesses; i.e. a "saturation policy" for a particular use/ type of business may be appropriate in one centre, but not another. Views also expressed through the Regulation 18 consultation vary, with some respondents supporting this approach (e.g. Town Councils), while others (major retail developers) argue that this could constrain growth. On this basis, saturation policies could be most effective where set through individual Neighbourhood Plans, rather than the LPP2.</p>	Neighbourhood Plans
Q20	Managing the impacts of main town centre uses beyond the town centres	Q20 considers the possibility of setting local impact test thresholds for main town centre/ retail uses, compared to the national standard (>2500 sq m; NPPF paragraph 26)	<p>The LPP1 (Policy 12(g)) applies the national impact test minimum standard (>2500 sq m) for North Northamptonshire. The NPPF allows for the Local Plan to define lower standards, which Q20 considers. Q20 suggests possible impact test thresholds: 500 sq m (Rushden) and 100 sq m (Market Towns), but this issue has not been addressed through the three urban Neighbourhood Plans that have so far been published so it is therefore considered appropriate to review this further through the LPP2.</p>	LPP2
Q21	Local centres	Q21 considers the possibility for designating "Local centres"; neighbourhood hubs of main town centre uses (e.g. convenience retailing) within the urban areas and/ or at the larger villages	<p>JCS Policy 12(g) makes provision for the designation of local centres; hubs for main town centre uses beyond the town centres. None of the three urban Neighbourhood Plans (together with Stanwick NDP) published to date has proposed designation of local centres, although it has previously (through the Four Towns Plan Working Party) been recognised that these may be appropriate. Given that no Neighbourhood Plans published to date have designated local centres, if this approach is taken forward then designations could only be made through the LPP2.</p>	LPP2 (if supported)

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q22	Existing employment areas	Q22 considers whether the LPP2 should designate protected employment areas, in accordance with JCS Policy 22	The LPP1 (JCS Policy 22(c)) allows for existing/ established employment areas to be safeguarded/ protected through the LPP2/ Neighbourhood Plans. It is noted that of eight Neighbourhood Plans published to date, six include the designation of safeguarded/ protected employment areas. Furthermore, the Minerals and Waste Local Plan (adopted July 2017) designates established employment/ industrial areas at Higham Ferrers, Oundle and Rushden as suitable for waste processing facilities. Initial assessments have identified a range of employment areas >1ha across the District that could be safeguarded/ protected, many of these not within areas where Neighbourhood Plans are being prepared. Other employment areas may represent non-conforming/ "bad neighbour" uses; in which case alternative uses should be promoted through the LPP2.	LPP2, unless already covered by way of a Neighbourhood Plan/ Minerals and Waste Local Plan
Q23	Potential to allocate further employment land allocations	Q23 considers if/ whether it is necessary for the LPP2 to allocate further employment land to deliver the JCS jobs target (Policy 23/ Table 3; 7200 jobs)	A review of jobs numbers and new employment developments coming forward since 2011 has revealed that there are more than enough major delivered/ committed sites (including Rushden Gateway, Rushden Lakes, Rushden East, Warth Park and Islip) to significantly exceed the strategic Local Plan (JCS) jobs target (7200 jobs; JCS Policy 23(d)/ Table 3) for the entire plan period (2011-2031). Therefore, there is no need to allocate further new strategic employment sites. That said, consideration needs to be given to actively supporting and promoting significant employment/ regeneration sites across the District. Securing successful redevelopment of key regeneration sites is a key challenge for the LPP2.	LPP2, unless already covered by way of a Neighbourhood Plan
Q24	Tourism and culture	Q24 considers how policies may be developed through the LPP2 to prioritise/ support tourism related development.	Tourism is recognised as a key economic sector; e.g. through the recently adopted Economic Development Strategy. The Regulation 18 consultation has revealed a range of ideas as to how the LPP2 could actively promote tourism; both in relation to the Nene Valley and provision of additional tourist accommodation. Such matters, which are covered at a strategic level by several LPP1 (JCS) policies (20, 21 and 25) may benefit from more detailed site specific proposals to deliver particular enhancements (e.g. new waterside developments or hotels), which could be allocated through the LPP2.	Overarching framework set through LPP1 (JCS); priority site specific proposals could then be allocated through LPP2.

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q25	Community infrastructure	Q25 considers how the LPP2 could prioritise/ protect established community facilities/ open spaces	The LPP1 (JCS Policy 7) contains the overarching policy requirements for protecting existing community facilities/ public open spaces. To date, all published Neighbourhood Plans (eight, so far) include detailed site specific policies for the protection of locally important facilities and public open spaces. The JCS contains specific policy criteria for protecting community infrastructure. All Neighbourhood Plans published so far include site specific designations for individual priority sites of community infrastructure/ open space whose protection is sought through mechanisms including the development plan/ Asset of Community Value (ACV). In cases where high quality community infrastructure is identified; JCS Policy 7, Neighbourhood Plan designations and/ or ACVs provide a robust range of mechanisms and tools to protect existing community infrastructure and it is not considered necessary for the LPP2 to designate further sites.	JCS and Neighbourhood Plans
Q26	Health and wellbeing	Q26 considers the opportunities that the LPP2 could identify to deliver improvements to overall health and wellbeing across the district as a whole	The Regulation 18 consultation highlighted strong views of key statutory consultees (Sport England, NCC) that the LPP2 could develop JCS policies further (e.g. 1, 7, 8 and 19) in providing more detailed strategic (District-level) direction to promote health and wellbeing; both healthcare infrastructure and delivering healthier lifestyles. Such an approach needs to build upon existing direction provided through the LPP1. It may be that areas of deprivation (by Super Output Area) may be prioritised for new health and wellbeing provision through the LPP2.	LPP2 (building upon adopted JCS policies)
Q27	Rushden East	Q27 considers what (if any) further policy provision should be made through the LPP2 to ensure successful delivery of a sustainable development at Rushden East	JCS Policy 33, while not a site specific allocation, provides detailed policy direction for securing a sustainable development scheme at Rushden East. Critically, Policy 33 requires approval of a comprehensive masterplan, before development can take place. In this regard there is little value that the LPP2 could add to the detailed direction already set out in Policy 33.	JCS
Q28	Rushden - other site specific allocations	Q28 considers what provision needs to be made for further housing land allocations at Rushden (over and above Rushden East) to deliver the outstanding/ residual JCS housing requirement (JCS Policy 29/ Table 5; 3285 dwellings)	Since the Regulation 18 consultation, the draft Rushden Neighbourhood Plan (including site specific allocations to meet the outstanding/ residual housing requirement) has been published for Regulation 14 consultation (spring 2017) and subsequently submitted for examination 26/10/2017). The Neighbourhood Plan allocates land to deliver 610 dwellings; sufficient to covers the residual housing requirement.	Neighbourhood Plan

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q29	Oundle - site specific applications	Q29 considers what provision needs to be made through the LPP2 to deliver the residual JCS housing requirement (approximately 200-210 dwellings, out of 645 dwellings - JCS Policy 29/ Table 5)	The current LPP2 includes site specific allocations for the plan monitoring period to 2021 (RNOTP policies OUN3/ OUN4). Most RNOTP site allocations have now come forward; although it must be noted that this Plan only makes provision for the first half of the JCS period. The RNOTP (paragraph 8.18) makes possible provision for longer term sites at the town, although it is emphasised that these are not allocations so provision for at least a further 200 dwellings should be made through the LPP2 and/ or a Neighbourhood Plan. Preparation of a Neighbourhood Plan for Oundle started in 2012 (Fronrunner funding), but to date (autumn 2017) no draft Plan has been published for consultation. On this basis questions must be raised as to the likelihood of a Neighbourhood Plan being delivered, so it should be assumed that further provision would need to be made through the LPP2.	LPP2; or Oundle Neighbourhood Plan if/ when this is published for consultation
Q30	Irthlingborough East employment area	Q29 considers what approach should best be taken through the LPP2 with regards to the Nene Park/ Irthlingborough East employment area; a priority regeneration site within the District.	The Irthlingborough East (Nene Park/ Nene Business Park) is arguably now the most significant regeneration site within East Northamptonshire. Bringing forward a successful redevelopment scheme would involve significant leadership and resourcing by East Northamptonshire Council. The JCS (LPP1), together with national policy, supports the principle of securing redevelopment of redundant/ under-used brownfield land (Policy 6). Irthlingborough East contains particular challenges, particularly land assembly and addressing constraints such as flood risk. Given the particular challenges associated with this site, and that preparation of a Neighbourhood Plan for Irthlingborough is still at an early stage, securing a successful redevelopment scheme for Irthlingborough East must be led through the LPP2.	LPP2
Q31	Deenethorpe Airfield (Tresham Garden Village)	Q31 considers what (if any) further policy provision should be made through the LPP2 to ensure successful delivery of a new Garden Village (Tresham) at Deenethorpe Airfield	JCS Policy 14, while not a site specific allocation, provides detailed policy direction for securing a sustainable new Garden Village at Deenethorpe Airfield. Implementation of the proposed scheme will be led by the preparation of a masterplan, as required by Policy 14. In this regard there is little value that the LPP2 could add to the detailed direction already set out in Policy 14.	JCS

Appendix 1: Scoping assessment for Local Plan Part 2

Reg 18 Question		Analysis		Best covered by:
Q32	Site allocations: contingency sites	Q32 considers the need for the LPP2 to include contingency site allocations; for if one or more of the committed strategic development sites does not come forward.	A significant number of responses have come forward regarding the possible inclusion of additional land allocations to provide a contingency for if one or more of the major strategic sites (e.g. Rushden East, Irthlingborough West) does not come forward in accordance with the planned trajectory. The majority of respondents (developers/ land agents) felt that the inclusion of contingency (or reserve) sites should be supported for the LPP2. Reserve sites are a mechanism for ensuring continued delivery of housing in accordance with government policy. Therefore this is a strategic matter, which could only be addressed through the LPP2.	LPP2

Appendix 2 – Draft structure/ framework for East Northamptonshire District-wide Local Plan Part 2

1. Introduction

- Context/ role/ status of Local Plan Part 2
- Area/ spatial portrait of East Northamptonshire
- Vision and Outcomes
- Presumption in favour of sustainable development

2. Spatial Development Strategy

- Settlement hierarchy (rural areas)
- Settlement boundaries – setting out a criteria based policy approach to enabled future planning applications to be judged against policy requirements in respect of acceptability principles

3. Natural Capital

- Environment
- Green infrastructure
- Energy
- Leisure and recreation

4. Social capital

- Design
- Culture
- Heritage
- Tourism
- Health and wellbeing
- Community infrastructure

5. Economic prosperity

- Employment
- Economy
- Town centres/ retail

6. Housing delivery

- Housing mix/ tenure
- Affordable housing
- Specialist housing
- Market delivery
- Site specific allocations

7. Town Strategies

- Higham Ferrers
- Irthlingborough
- Oundle
- Raunds
- Rushden
- Thrapston

8. Monitoring and implementation