

Rep No	User No	User Rep No	Contact Name/ Organisation Name	Section/ chapter heading	Area	Policy/ paragraph reference	Theme/ topic	Representation received	
19	7	4	Glaphorn Parish Council	1. Introduction	Oundle	para 1.15 - 1.17	Context for the Plan	Furthermore, the Draft Local Plan does not contain any local policies which overtly compromise the Glaphorn Neighbourhood Plan (GNP) policies. However, whilst the GNP sits equally alongside the JCS and Local Plan to form the development plan, the Parish Council is aware that if there is any divergence between plans then the wording of the latest plan takes precedence. There are a few policies where the Local Plan's proposed wording could be interpreted as being less affirmative than a corresponding a GNP policy. We appreciate that perhaps this arises because the ENC Local Plan has the difficult job of covering both areas with Neighbourhood Plans and those areas (the majority) without. A few sensible caveats and edits to the ENC wording would easily remedy any such issues and these are detailed in Section 3 below.	Proposed changes to text and/ or policies - Edits provided in further Reps from GTC
124	29	1	Huntingdonshire District Council	1. Introduction		para 1.21	Duty to Cooperate	Huntingdonshire District Council are supportive of the East Northamptonshire Local Plan Part 2. We are satisfied that the Duty to Cooperate has been adequately addressed during its preparation with regard to strategic issues affecting Huntingdonshire.	No further changes required - Generic rep/ comment
125	29	2	Huntingdonshire District Council	1. Introduction		para 1.21	Duty to Cooperate	However, Huntingdonshire District Council would be happy to work with East Northamptonshire to prepare a Statement of Common Ground regarding any identified strategic matters that may be attributed to the East Northamptonshire Local Plan (Part 2) if required.	No further changes required - Generic rep/ comment
132	31	1	Member of the public	1. Introduction	District-wide	Section 1.0	Consultation	The deadline for responding is too short – issuing a consultation with a deadline just before Christmas allows an unreasonably short time and the deadline should be extended until the end of January 2019.	No further changes required - Consultation was extended for Oundle sites
133	31	2	Member of the public	1. Introduction	District-wide	Section 1.0	Consultation	The Draft Local Plan (the Draft) ignores the progress made by Oundle Town Council in drafting the Oundle Neighbourhood Plan, the views expressed therein and the comments submitted as part of the Town Council's consultation. Para 2.25 of the Draft calls for the respective Neighbourhood and Local Plan policies to complement one another and Para 2.53 states that the Draft should recognise and accommodate the detailed specific policies in the Neighbourhood Plan regarding development land allocations. Para 3.7 expects the process to be community led and para 3.10 states that proposals which conflict with policies in a Neighbourhood Plan should be refused unless material considerations indicate otherwise. On the above bases the Draft and its proposed land allocations are fundamentally flawed.	No further changes required - Generic rep/ comment
173	37	1	Pegasus Planning	2. Area portrait	Rushden	para 2.6 - 2.9	Growth Town	The adopted North Northamptonshire Joint Core Strategy (NNJCS) identifies Rushden as a 'Growth Town', as such, Rushden is recognised in local planning policy as the most sustainable settlement in the district. Paragraphs 2.6 -2.9 and Chapter 4 of the draft Local Plan Part 2 (LPP2) acknowledge the sustainability of Rushden and its ability to accommodate future growth which would in turn provide increased investment in Rushden. The LPP2's commitment to maintaining Rushden's status as a Growth Town is supported, indeed, the recently adopted Rushden Neighbourhood Plan will assist in delivering growth and investment in Rushden.	No further changes required - Generic rep/ comment
174	37	2	Pegasus Planning	2. Area portrait	Rushden	para 2.6 - 2.9	Growth Town	As acknowledged at paragraph 2.9 of the LPP2, the Rushden Neighbourhood Plan contains a number of detailed policies and residential site allocations to deliver growth in Rushden. We support the LPP2 in its continued approach to promoting Rushden as a settlement to accommodate significant levels of growth. In addition, we endorse the Plan's acknowledgement, at paragraph 8.10, that the Rushden Neighbourhood Plan has allocated sites to deliver housing which will assist in meeting overarching housing requirements set by the NNJCS. Indeed, Policy H2 Rushden Neighbourhood Plan allocates a number of sites for development which stand to deliver 610 of the 894-outstanding dwelling requirement assigned for delivery in Rushden by the NNJCS.	No further changes required - Generic rep/ comment

175	37	3	Pegasus Planning	2. Area portrait	Rushden	para 2.6 - 2.9	Growth Town	In this context, it is important to highlight the immediate positive impact the Rushden Neighbourhood Plan is having in terms of facilitating housing growth in Rushden. A full planning application for 80 dwellings at the Land south of Northampton Road, Rushden is currently waiting to be determined by the East Northamptonshire Council (ENC). The Land south of Northampton Road site is allocated in the Rushden Neighbourhood Plan (Policy H3: E) and stands to form part of the Council's committed housing land supply and thus provide deliverable market and affordable housing opportunities to meet the needs of the local area and wider district.	No further changes required - Generic rep/ comment
176	37	4	Pegasus Planning	2. Area portrait	Rushden	para 2.6 - 2.9	Growth Town	The LPP2's commitment to supporting the provisions of the Rushden Neighbourhood Plan and meeting NNJCS housing targets is supported. Given the existing high demand for market and affordable housing in the district and the backdrop of rising housing need provided by the Government's standard methodology figures it is vital that ENC view NNJCS targets as a minimum figure and are proactive and positive in their approach to facilitating housing delivery.	No further changes required - Generic rep/ comment
177	37	5	Pegasus Planning	2. Area portrait	Rushden	para 2.6 - 2.9	Growth Town	By acknowledging and supporting the provisions of the Rushden Neighbourhood Plan the LPP2 is supporting the objectives of the National Planning Policy Framework (NPPF) to significantly boost the supply of homes (paragraph 59) and the housing growth policies of the NNJCS.	No further changes required - Generic rep/ comment
349	66	1	Kier Ventures Ltd	2. Area portrait	Rural areas	para 2.45	Brigstock	Agree Brigstock acts is a sustainable larger service village location which functions as a service centre for its wider rural hinterland.	No further changes required - Generic rep/ comment
350	66	2	Kier Ventures Ltd	2. Area portrait	Rural areas	para 2.45	Brigstock	The document fails to refer to the Brigstock Neighbourhood Plan which was made 06.12.18. Greater explanation should be provided regarding the role of Neighbourhood Plans, principally in relation to NPPF Paragraphs 20 and 29.	No further changes required - The role of neighbourhood plans is referred to in the Local Plan, it is not appropriate to provide isolated examples in this section of the Plan.
505	90	1	Hollins Strategic Land	2. Area portrait	Rural areas	Section 2.0	Area Portrait	2.1 Hollins Strategic Land (HSL) support the recognition in the LP Part 2 that the district can be divided into three distinctive rural sub-areas. East Northamptonshire encompasses a large and varied area and it is important that the differences across the district are recognised and that the LP Part 2 plans appropriately for the specific needs and character of each area.	No further changes required - rep is supportive of the Plan approach
506	90	2	Hollins Strategic Land	2. Area portrait	Rural areas	para 2.45	Area Portrait	2.2 Easton on the Hill demonstrates this in particular, being located in the northern-most spur of the district, close to the boundaries of Rutland County Council to the east and Peterborough City Council to the west. Paragraph 2.45 of the LP Part 2 identifies Easton as falling within the Rockingham Forest and Welland Valley sub- area and states that 'within the heart of the forest itself are a small number of larger rural settlements, some which function as service centres for a wider rural hinterland.'	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.
507	90	3	Hollins Strategic Land	2. Area portrait	Rural areas	Section 2.0	Area Portrait	2.3 HSL do not disagree with the identification of Easton as falling within this sub-area. However, they consider it essential that the LP Part 2 explicitly recognise that whilst Easton is part of East Northamptonshire, it is closely related to the nearby town of Stamford within Peterborough City Council. Stamford provides significant employment opportunities, a range of services and facilities and excellent transport links.	No further changes required - Generic rep/ comment

508	90	4	Hollins Strategic Land	2. Area portrait	Rural areas	Section 2.0	Area Portrait	This cross-boundary relationship is essential to a proper understanding of Easton on the Hill – its existing character and function, as well as its capacity and potential for future growth. The accessibility to Peterborough is also an important consideration when considering the distribution of housing in this part of East Northamptonshire.	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.
509	90	5	Hollins Strategic Land	2. Area portrait	Rural areas	para 2.43 - 2.48	Area Portrait	2.4 In light of this, HSL consider the description of this sub-area (within paragraphs 2.43 to 2.48 of the LP Part 2) should include an explicit recognition of the proximity and relationship between Easton and Stamford.	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.
510	90	6	Hollins Strategic Land	2. Area portrait	Rural areas	para 2.45	Area Portrait	2.5 Suggested Modification: We suggest adding the following wording to paragraph 2.45: "Easton on the Hill, in the most northern part of the district, is influenced by the proximity to Stamford and its relationship with that higher order settlement."	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.
511	90	7	Hollins Strategic Land	2. Area portrait	Rural areas	Section 2.0	Area Portrait	2.6 It is considered this explicit recognition will ensure the Plan can be considered to be 'positively prepared' and 'effective' as required by paragraph 35 of the National Planning Policy Framework (NPPF) as it acknowledges the nature of the cross-boundary relationships in this part of the district.	No further changes required - Generic rep/ comment
512	90	8	Hollins Strategic Land	2. Area portrait	Rural areas	Figure .7	Area Portrait	2.7 In light of the comments above, HSL support Figure 7: Spatial Elements of the district set out on page 24 of the Local Plan. In particular, the reference to Peterborough/ Stamford as influences on the character of the district are welcomed. This approach of distinguishing between the varying areas of the district and the influences on these is considered 'justified' and helpful for 'effective' plan-making, in accordance with the tests of 'soundness' set out in Paragraph 35 of the NPPF.	No further changes required - Generic rep/ comment

576	95		1 Member of the public	2. Area portrait	Oundle	para 2.2	Descriptive accuracy	Para 2.20. The R Nene is to the south and east of Oundle and overall the R Nene runs from the south towards Oundle and goes to the north away from Oundle on the eastern edge of the town. The description “enclosing the urban area on its north, east and south sides” is misleading. I would describe the position of the developed areas of Oundle as “close to the R Nene floodplain to the south and east of the town”.	Proposed changes to text and/or policies - Amendment to the text be made to reflect the rep.
577	95		2 Member of the public	2. Area portrait	Oundle	para 2.23	Population description	Paragraph 2.23. I am surprised that the number of boarders in the local schools is not mentioned as part of the overview of population levels. It is rather different from the other market towns covered in East Northamptonshire.	No further changes required this is a detailed issue, which has no direct bearing on the strategy approach.
578	95		3 Member of the public	2. Area portrait	Oundle	para 2.23	Population description	The following table sets out the data for Oundle Parish – I am not sure whether you are using Parish or Ward data. Census date Oundle Parish: 2001 2011 Total - 5345 5735 in households - 4497 4834 in communal establishments - 848 901 students away - 168 167 total - 4754 5035 - non medical communal + students away	No further changes required - accurate/up to date information is being used
579	95		4 Member of the public	2. Area portrait	Oundle	para 2.23	Population description	The importance of these additional young people throughout term time and the numbers of additional day pupils from nearby areas is a key characteristic of Oundle and is distinctive. It surely shapes the needs of the town – both for transport and for space required for a range of activities within the public domain.	No further changes required this is a detailed issue, which has no direct bearing on the strategy approach.
580	95		5 Member of the public	2. Area portrait	Oundle	para 2.23	Population description	As your system will not accept table easily I will send a separate representation of all my comments. Why can't I simply cut and paste from a word document.	No further changes required - Generic rep/ comment
581	95		6 Member of the public	2. Area portrait	Oundle	para 2.24	Boundary issues	Paragraph 2.24. These assets are outside the boundary of Oundle Parish. Your decision on the boundary for the Neighbourhood Plan for Oundle was the Parish Boundary – which precluded consideration of these assets. This was extraordinary given the status of the town set out in Paragraph 2.20 – surely a service centre and main market town for the rural north of the district should and must consider its immediate context when developing a neighbourhood plan? Your decision essentially prevented this. All this seems counter to the elements in your Vision set out in Paragraph 3.2, in particular to “work with communities to achieve their aspirations for their local area”.	No further changes required - The text makes reference to these landmarks lying beyond the main town, they do however, have a clear relationship with the town.
820	124		5 Glapthorn Parish Council	1. Introduction	District-wide	Section 1.0	Soundness tests	v. Furthermore, the Draft Local Plan does not contain any local policies which overtly compromise the Glapthorn Neighbourhood Plan (GNP) policies. However, whilst the GNP sits equally alongside the JCS and Local Plan to form the development plan, the Parish Council is aware that if there is any divergence between plans then the wording of the latest plan takes precedence.	No further changes required - Generic rep/ comment
821	124		6 Glapthorn Parish Council	1. Introduction	District-wide	Section 1.0	Soundness tests	There are a few policies where the Local Plan's proposed wording could be interpreted as being less affirmative than a corresponding a GNP policy. We appreciate that perhaps this arises because the ENC Local Plan has the difficult job of covering both areas with Neighbourhood Plans and those areas (the majority) without. A few sensible caveats and edits to the ENC wording would easily remedy any such issues and these are detailed in Section 3 below.	Additional evidence required to determine potential change/address representation
928	146		1 Member of the public	1. Introduction	District-wide	Section 1.0	Overall approach	I have recently read the East Northamptonshire District Plan (ENDP). I find much in it that is welcome as a guide to future development in the area.	No further changes required - Generic rep/ comment
984	153		3 Member of the public	2. Area portrait	Oundle	para 2.25 & 2.53	Consultation	The Draft Local Plan (the Draft) ignores the progress made by Oundle Town Council in drafting the Oundle Neighbourhood Plan, the views expressed therein and the comments submitted as part of the Town Council's consultation. Para 2.25 of the Draft calls for the respective Neighbourhood and Local Plan policies to complement one another and Para 2.53 states that the Draft should recognise and accommodate the detailed specific policies in the Neighbourhood Plan regarding development land allocations.	No further changes required - Generic rep/ comment

1142	180	1	Pilton, Stoke Doyle and Wadenhoe Parish Council	1. Introduction	District-wide	Section 1.0	Neighbourhood Planning	We welcome the policy emphasis linking the Plan to the Joint Core Strategy, but feel strongly that it should take into account perceived housing needs and aspirations identified in the Neighbourhood Plans that have so far been 'made', for example, in Raunds, Stanwick, Glapthorn and Chelveston cum Caldecott and Oundle's emerging Neighbourhood plan.	No further changes required - Section 2 of the Plan makes reference to the impact of various neighbourhood plans.
1187	186	4	Member of the public	2. Area portrait	Oundle	para 2.25 & 2.53	Emerging Oundle Neighbourhood Plan	The EN draft local plan (ENDLP) therefore ignores the wishes of local residents, contrary to several statements in the draft. Para 2.25 calls for respective Neighbourhood and Local Plan policies to complement each other and Para 2.53 states the plan should recognise and accommodate the detailed specific policies in the Neighbourhood plan regarding land allocations.	No further changes required - The Council works closely with neighbourhood plan groups, the Plan in question is still at a relatively early stage in process.
1226	191	9	Corby Borough Council	1. Introduction	District-wide	Section 1.0	Structure	It is also felt that the opportunity could be taken to re-order the Plan to better fit the structure of the JCS and provide clearer guidance for developers, agents and landowners. For example paragraphs 7.45 to 7.72 covering town centres, local centres and shopping frontages could be moved to section 9 (Town Strategies) so focusing section 7 (Economic Prosperity) on issues relating to jobs/ workers, employment land, sectoral strengths, skills and rural economic development etc. and Policy EN6: Replacement dwellings in the open countryside be moved to section 8 (Housing Delivery).	Additional evidence required to determine potential change/address representation
1227	191	10	Corby Borough Council	1. Introduction	District-wide	Section 1.0	Structure	It is also suggested that the flow of some sections could be improved by moving technical information such as Table 11: Employment Land Uses to an appendix if its inclusion is warranted. There may be opportunities to reduce the length of the Plan or provide further assistance to the reader by including more weblinks. For example, references to a number of Neighbourhood Plans in section 2 and discussion of the work of SEMLEP in section 7 could benefit from such an approach.	Additional evidence required to determine potential change/address representation
1229	192	2	Historic England	1. Introduction	District-wide	Section 1.0	Statutory consultees	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.	No further changes required - Generic rep/ comment
1231	192	4	Historic England	1. Introduction	District-wide	Section 1.0	Statutory consultees	Please note that Historic England have 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: https://www.historicengland.org.uk/advice/planning/planning-system/	No further changes required - Generic rep/ comment
1232	192	5	Historic England	1. Introduction	District-wide	Section 1.0	Statutory consultees	Historic England has also 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: http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/	No further changes required - Generic rep/ comment
1233	192	6	Historic England	1. Introduction	District-wide	para 1.25-1.26	Sustainability Appraisal	Guidance in relation to Sustainability Appraisals can be found here:- https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/	No further changes required - Generic rep/ comment
1234	192	7	Historic England	2. Area portrait	Higham Ferrers	para 2.10	Higham Ferrers	Reference to the Church of St Mary the Virgin is welcomed.	No further changes required - supportive rep/ comment

1250	192	23	Historic England	1. Introduction	District-wide	para 1.25-1.26	Sustainability Appraisal	Sustainability Appraisal I note there is not a corresponding Sustainability Appraisal. I would refer you to the guidance above for further details.	Additional evidence required to determine potential change/address representation - The SA is an iterative process which accompanies the Local Plan, and is being undertaken as part of the Plan
1251	192	24	Historic England	1. Introduction	District-wide	para 1.18	Soundness tests	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.	Additional evidence required to determine potential change/address representation
1397	209	7	Natural England	1. Introduction	District-wide	para 1.27 - 1.28	Habitat Regulations Assessment	Local Plan Policies We advised within our Regulation 18 response that 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). Here we put the onus on the Council to ensure that proposals do not fall within Functionally Linked Land (FLL) to the SPA; this protection could be in the form of policy wording, and screening for FLL may be a useful addition within the HRA.	Additional evidence required to determine potential change/address representation
1399	209	9	Natural England	1. Introduction	District-wide	para 1.28	Habitat Regulations Assessment	Habitats Regulations Assessment (HRA) 1.28 of the draft Plan states that this Plan will be subject to Habitat Regulations Assessment, under the Conservation of Habitats and Species Regulations 2010, as amended (SI 2010 No 4904). The Habitat Regulations Assessment is being undertaken by AECOM on behalf of East Northamptonshire Council, in parallel with the preparation of the Plan. We cannot comment on this aspect of the Plan, since the HRA has not been completed. Natural England are a statutory consultee for the Appropriate Assessment stage and expect the chance to comment on the HRA prior to examination.	Additional evidence required to determine potential change/address representation
1400	209	10	Natural England	1. Introduction	District-wide	para 1.25-1.26	Sustainability Appraisal	Sustainability Assessment (SA) Although Natural England previously commented that Natural England is broadly satisfied with the proposed scope of the Sustainability Appraisal, we cannot advance on this comment since the full document has not been provided. As above, Natural England expect the chance to comment on the SA prior to examination.	Additional evidence required to determine potential change/address representation
1530	214	7	Member of the public	2. Area portrait	Oundle	para 2.25 & 2.53	Consultation	The EN draft local plan (ENDLP) therefore ignores the wishes of local residents, contrary to several statements in the draft. Para 2.25 calls for respective Neighbourhood and Local Plan policies to complement each other and Para 2.53 states the plan should recognise and accommodate the detailed specific policies in the Neighbourhood plan regarding land allocations. Para 3.7 expects the process to be community led and para 3.10 states that proposals which conflict with policies in a Neighbourhood plan should be refused unless material considerations indicate otherwise.	No further changes required - Generic rep/ comment
1787	231	8	David Wilson Homes Ltd	2. Area portrait	Oundle	para 2.25	Emerging Oundle Neighbourhood Plan	Para 2.25 of the emerging LP rightly acknowledges the efforts which are being made by Oundle Town Council to both produce and adopt a Neighbourhood Plan for their area. It is urged that ENC and OTC work together in bringing forward their respective strategies, particularly in respect of our client's site adjacent to the cemetery at Stoke Doyle Road in Oundle. For clarification, the client alongside ourselves have been in continuous dialogue with OTC during their efforts to produce their Neighbourhood Plan and we will continue to provide assistance where possible to assist in their efforts.	No further changes required - Generic rep/ comment
1837	234	4	Gladman Developments Ltd	1. Introduction	District-wide	Section 1.0	Consultation	1.2 Context 1.2.1 These representations have been prepared in response to the East Northamptonshire Draft Plan Consultation, which has been published for consultation from 2 November 2018 until 17 December 2018. Gladman welcomes the opportunity to comment on the emerging policies and text contained within the Part 2 Plan and notes the key milestones that have been summarised in Figure 1 of the Consultation Plan.	No further changes required - Generic rep/ comment

1838	234	5	Gladman Developments Ltd	1. Introduction	District-wide	Section 1.0	Consultation	This highlights the intention of the Council to publish the presubmission version of the Plan (under Regulation 19) in February/March 2019 and to submit the Plan (under Regulation 22) in May 2019. It is therefore acknowledged that the Plan is being prepared under the provisions of the revised National Planning Policy Framework (2018). The Local Plan Part 2 is also being prepared within the context of the adopted North Northamptonshire Joint Core Strategy its content must therefore be drafted to remain in general conformity with the strategic policies that are already set within that element of the Plan.	No further changes required - Generic rep/ comment
1839	234	6	Gladman Developments Ltd	1. Introduction	District-wide	para 1.18	Consultation	1.2.2 The National Planning Policy Framework (2018) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan, it is fundamental that it is: - Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need for neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.	No further changes required - Generic rep/ comment
1840	234	7	Gladman Developments Ltd	1. Introduction	District-wide	Section 1.0	Consultation	1.2.3 These representations concern the following main matters: - Duty to Cooperate - Sustainability Appraisal - Detailed Policies - Site Allocations	No further changes required - Generic rep/ comment
1843	234	10	Gladman Developments Ltd	1. Introduction	District-wide	para 1.19-1.21	Duty to Cooperate	2.1 Duty to Cooperate 2.1.1 The Duty to Cooperate remains relevant in supporting the production of Part 2 Local Plans within the individual districts that make up the wider area that is covered by the North Northamptonshire Joint Core Strategy. Whilst it is noted that it is currently anticipated that the authorities will merge into a single unitary authority for North Northamptonshire in May 2020, where individual Part 2 Plans are brought forward in the meantime, it is essential that they fully reflect and complement the shared growth strategy that has been adopted within the Joint Core Strategy. National policy contained in the Framework (2018) and the Planning Practice Guidance requires local authorities to maintain statements of common ground throughout the plan making process in order to provide transparency on issues that are relevant to the Duty to Cooperate.	No further changes required - Generic rep/ comment
1844	234	11	Gladman Developments Ltd	1. Introduction	District-wide	para 1.25-1.26	Sustainability Appraisal	2.2 Sustainability Appraisal 2.2.1 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 (SEA Regulations), 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.	Additional evidence required to determine potential change/address representation
1845	234	12	Gladman Developments Ltd	1. Introduction	District-wide	para 1.25-1.26	Sustainability Appraisal	2.2.2 It is noted that AECOM is preparing a sustainability appraisal on behalf of the Council in parallel with the preparation of the Part 2 Plan. The process of undertaking the sustainability appraisal should clearly justify the local plan’s policy choices, including the proposed site allocations and the approach taken to managing growth when judged against ‘all reasonable alternatives’. 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.	Additional evidence required to determine potential change/address representation

1846	234	13	Gladman Developments Ltd	1. Introduction	District-wide	para 1.25-1.26	Sustainability Appraisal	The Council's decision making and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence environment (including landscape) issues, social concerns and the economy.	Additional evidence required to determine potential change/address representation
1847	234	14	Gladman Developments Ltd	1. Introduction	District-wide	Section 1.0	Consultation	3.1 Context and Overview 3.1.1 This section of the representations is made in response to the emerging policies and supporting text contained within the Draft East Northamptonshire Local Plan Part 2.	No further changes required - Generic rep/ comment
1853	234	20	Gladman Developments Ltd	1. Introduction	District-wide	Section 1.0	Local Plan Review	3.2 Local Plan Review 3.2.1 National Policy requires sustainable development to be pursued in a positive way, with a presumption in favour of sustainable development at its heart1. The planning system should be genuinely plan led and plans should be prepared with the objective of contributing to the achievement of sustainable development.	No further changes required - Generic rep/ comment
1854	234	21	Gladman Developments Ltd	1. Introduction	District-wide	Section 1.0	Local Plan Review	The National Planning Policy Framework emphasises the importance of having an up-to-date local plan; the role of plans in providing a positive vision for the future of their areas; the requirement to address housing needs and other economic, social and environmental priorities; and, the role that plans play in providing a platform for local people to shape their surroundings. As a result, local plans should contain an effective monitoring framework and should provide transparent benchmarks that will inform the process of fulfilling the legal requirement for plans to be reviewed at least every five years.	No further changes required - Generic rep/ comment
1856	234	23	Gladman Developments Ltd	1. Introduction	District-wide	Section 1.0	Local Plan Review	3.2.2 In preparing the Part 2 Local Plan, careful consideration must be given to the adopted Joint Core Strategy's commitment to identifying additional land if the Sustainable Urban Extensions (SUEs) are not delivered fast enough to maintain a five year housing land supply and a partial review of the Joint Core Strategy if the SUEs deliver less than 75% of projected completions in three consecutive years.	No further changes required - Issues relating to deliverability will be kept under review, strategic issues will be addressed through a review of the JCS.
1923	235	2	Home Builders Federation	1. Introduction	District-wide	Section 1.0	Joint Core Strategy	The North Northamptonshire Joint Core Strategy (NNJCS) for Corby, East Northamptonshire, Kettering and Wellingborough Councils adopted in July 2016 sets out :- <ul style="list-style-type: none"> • the overall spatial strategy ; • the level of growth and its distribution ; • strategic site allocations (>500 dwellings) and ; • strategic policies including place shaping requirements and development management policies. 	No further changes required - Generic rep/ comment
1924	235	3	Home Builders Federation	1. Introduction	District-wide	Section 1.0	Joint Core Strategy	The adopted NNJCS provides the strategic framework for the East Northamptonshire LPP2 so the two Plans are intrinsically linked. The NNJCS is a comprehensive document therefore the LPP2 does not need to re-address issues dealt with in the NNJCS and local detail set out in the LPP2 should not duplicate policies adopted in the NNJCS.	No further changes required - Generic rep/ comment
1943	235	22	Home Builders Federation	1. Introduction	District-wide	Section 1.0	Soundness tests	Conclusions For the East Northamptonshire LPP2 to be found sound under the four tests of soundness it must be positively prepared, justified, effective and compliant with national policy.	No further changes required - Generic rep/ comment
1944	235	23	Home Builders Federation	1. Introduction	District-wide	para 1.18	Soundness tests	The Council should consider the above mentioned responses in order to avoid preparing a LPP2 which is unsound. It is hoped that these comments are helpful to the Council in informing the next stages of the East Northamptonshire LPP2. If any further assistance or information is required please contact the undersigned.	No further changes required - Generic rep/ comment
1948	236	4	Hollins Strategic Land	2. Area portrait	Rural Areas	Section 2.0	Area Portrait	2.1 Hollins Strategic Land (HSL) support the recognition in the LP Part 2 that the district can be divided into three distinctive rural sub-areas. East Northamptonshire encompasses a large and varied area and it is important that the differences across the district are recognised and that the LP Part 2 plans appropriately for the specific needs and character of each area.	No further changes required - Generic rep/ comment

1949	236	5	Hollins Strategic Land	2. Area portrait	Rural Areas	para 2.45	Easton on the Hill	2.2 Easton on the Hill demonstrates this in particular, being located in the northern-most spur of the district, close to the boundaries of Rutland County Council to the east and Peterborough City Council to the west. Paragraph 2.45 of the LP Part 2 identifies Easton as falling within the Rockingham Forest and Welland Valley sub- area and states that ‘within the heart of the forest itself are a small number of larger rural settlements, some which function as service centres for a wider rural hinterland.’	No further changes required - Generic rep/ comment
1950	236	6	Hollins Strategic Land	2. Area portrait	Rural Areas	para 2.45	Easton on the Hill	2.3 HSL do not disagree with the identification of Easton as falling within this sub-area. However, they consider it essential that the LP Part 2 explicitly recognise that whilst Easton is part of East Northamptonshire, it is closely related to the nearby town of Stamford within Peterborough City Council. Stamford provides significant employment opportunities, a range of services and facilities and excellent transport links. This cross-boundary relationship is essential to a proper understanding of Easton on the Hill – its existing character and function, as well as its capacity and potential for future growth. The accessibility to Peterborough is also an important consideration when considering the distribution of housing in this part of East Northamptonshire.	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.
1951	236	7	Hollins Strategic Land	2. Area portrait	Rural Areas	para 2.43 - 2.48	Easton on the Hill	2.4 In light of this, HSL consider the description of this sub-area (within paragraphs 2.43 to 2.48 of the LP Part 2) should include an explicit recognition of the proximity and relationship between Easton and Stamford.	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.
1952	236	8	Hollins Strategic Land	2. Area portrait	Rural Areas	para 2.45	Easton on the Hill	2.5 Suggested Modification: We suggest adding the following wording to paragraph 2.45: “Easton on the Hill, in the most northern part of the district, is influenced by the proximity to Stamford and its relationship with that higher order settlement.”	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.

1953	236	9	Hollins Strategic Land	2. Area portrait	Rural Areas	para 2.45	Easton on the Hill	2.6 It is considered this explicit recognition will ensure the Plan can be considered to be 'positively prepared' and 'effective' as required by paragraph 35 of the National Planning Policy Framework (NPPF) as it acknowledges the nature of the cross-boundary relationships in this part of the district.	No further changes required - Most settlements have links to surrounding areas with larger urban areas in some cases.. Easton on the Hill does not have a unique position that requires its relationship with surrounding areas to be identified as a specific example.
1954	236	10	Hollins Strategic Land	2. Area portrait	Rural Areas	Figure .7	Area Portrait	2.7 In light of the comments above, HSL support Figure 7: Spatial Elements of the district set out on page 24 of the Local Plan. In particular, the reference to Peterborough/ Stamford as influences on the character of the district are welcomed. This approach of distinguishing between the varying areas of the district and the influences on these is considered 'justified' and helpful for 'effective' plan-making, in accordance with the tests of 'soundness' set out in Paragraph 35 of the NPPF.	No further changes required - Generic rep/ comment
1985	238	3	Linden Homes Strategic Land	1. Introduction	District-wide	Section 1.0	Soundness tests	We note from Paragraph 1.14 of the Local Plan Part 2 that the intention is for publication of a Presubmission Draft Plan and consultation (Regulation 19) in February-March 2019 and Submission of the Plan (Regulation 22) by May 2019. Paragraph 214 of the 2018 National Planning Policy Framework (2018 NPPF) states that "the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24th January 2019." As the Plan will be submitted after the 24th January 2019, the policies in the 2018 NPPF will apply to the Local Plan Part 2.	No further changes required - Generic rep/ comment
1986	238	4	Linden Homes Strategic Land	1. Introduction	District-wide	Section 1.0	Soundness tests	We consider that a number of amendments are required to the current Draft Plan to ensure that the Plan is sound under the 'test of soundness' contained in paragraph 35 of the 2018 NPPF.	Additional evidence required to determine potential change/address representation
1987	238	5	Linden Homes Strategic Land	1. Introduction	District-wide	Section 1.0	Soundness tests	Where relevant, suggestions for changes to the Draft Plan to address the concerns are identified in these representations. It is requested that the Council considers these representations and makes appropriate changes as identified in this representation.	Additional evidence required to determine potential change/address representation
2099	239	22	Lourett Developments	1. Introduction	District-wide	Section 1.0	Plan context	4. CONTEXT TO THE PLAN 4.1 The Council state that the draft Part 2 Local Plan has been prepared in accordance with paragraphs 15-37 of the National Planning Policy Framework which sets out the approach which should be taken in respect of plan- making. The Framework requires plans to be "prepared with the objective of contributing to the achievement of sustainable development".	No further changes required - Generic rep/ comment
2100	239	23	Lourett Developments	1. Introduction	District-wide	Section 1.0	Plan context	4.2 The North Northamptonshire Joint Core Strategy (Local Plan Part 1) deals with strategic issues, setting out the overall spatial strategy and the required level of growth and the distribution of growth.	No further changes required - Generic rep/ comment
2101	239	24	Lourett Developments	1. Introduction	District-wide	Section 1.0	Plan context	4.3 Paragraph 35 of the NPPF sets out the criteria against which an independent planning inspector will assess the Draft Local Plan Part 2 against to determine whether it has been prepared with the legal and procedural requirements, and whether it is 'sound'.	No further changes required - Generic rep/ comment
2162	242	5	Northants County Council Development Management	1. Introduction	District-wide	Section 1.0	Duty to Cooperate	General Comments 1. The County Council welcomes the approach adopted by East Northamptonshire Council (ENC) in preparing the Draft, which builds on the adopted North Northamptonshire Joint Core Strategy and positively supports the need for collaboration between local authorities and other partner organisations, to ensure that the 'duty to co-operate' obligation is met – particularly in relation to those areas of the district allocated as Sustainable Urban Extensions (SUEs) and at other strategic housing sites.	No further changes required - Generic rep/ comment

2163	242	6	Northants County Council Development Management	1. Introduction	District-wide	Section 1.0	Duty to Cooperate	2. The Draft clearly establishes the national and local policy context in which it will operate; in particular the need for Local Plans to be positively prepared, to meet the tests of the National Planning Policy Framework and to align with other local plans and policies.	No further changes required - Generic rep/ comment
2164	242	7	Northants County Council Development Management	1. Introduction	District-wide	Section 1.0	Duty to Cooperate	3. The County Council remains committed to working with ENC and partners at all stages of policy-shaping to support the development and implementation of planning policy. The County Council therefore welcomes opportunities to engage with ENC to discuss these matters, and to guide the planning and development of new education facilities and infrastructure to meet the needs of proposed growth.	No further changes required - Generic rep/ comment
2189	242	32	Northants County Council Development Management	1. Introduction		Section 1.0	Duty to Cooperate	22. This collaborative approach will help to ensure that appropriate infrastructure is provided which will meet the demands of anticipated growth, creating new and expanded schools which will serve local children and be a focus for communities for the future.	No further changes required - Generic rep/ comment
2205	244	1	Oundle Town Council (Cllr P Peel)	2. Area portrait	Oundle	para 2.20	Oundle	The R Nene is to the south and east of Oundle and overall the R Nene runs from the south towards Oundle and goes to the north away from Oundle on the eastern edge of the town. The description "enclosing the urban area on its north, east and south sides" is misleading. I would describe the position of the developed areas of Oundle as "close to the R Nene floodplain to the south and east of the town".	Proposed changes to text and/or policies - to reflect the rep
2206	244	2	Oundle Town Council (Cllr P Peel)	2. Area portrait	Oundle	para 2.23	Oundle	I am surprised that the number of boarders in the local schools is not mentioned as part of the overview of population levels. It is rather different from the other market towns covered in East Northamptonshire. The following table sets out the data for Oundle Parish – I am not sure whether you are using Parish or Ward data. Census date Oundle Parish: 2001 2011 Total 5345 5735 in households 4497 4834 in communal establishments 848 901 students away 168 167 total - non medical communal+students away 4754 5035	No further changes required - Most accurate information used using ENC's own data (Repeat of previous Rep)
2207	244	3	Oundle Town Council (Cllr P Peel)	2. Area portrait	Oundle	para 2.23	Oundle	The importance of these additional young people throughout term time and the numbers of additional day pupils from nearby areas is a key characteristic of Oundle and is distinctive. It surely shapes the needs of the town – both for transport and for space required for a range of activities within the public domain.	No further changes required this is a detailed issue, which has no direct bearing on the strategy approach.
2208	244	4	Oundle Town Council (Cllr P Peel)	2. Area portrait	Oundle	para 2.24	Oundle	These assets are outside the boundary of Oundle Parish. Your decision on the boundary for the Neighbourhood Plan for Oundle was the Parish Boundary – which precluded consideration of these assets. This was extraordinary given the status of the town set out in Paragraph 2.20 – surely a service centre and main market town for the rural north of the district should and must consider its immediate context when developing a neighbourhood plan?	No further changes required - it is considered that the supporting text provides an accurate description of the role of the market town..
2209	244	5	Oundle Town Council (Cllr P Peel)	2. Area portrait	Oundle	para 2.24	Oundle	Your decision essentially prevented this. All this seems counter to the elements in your Vision set out in Paragraph 3.2, in particular to "work with communities to achieve their aspirations for their local area".	Additional evidence required to determine potential change/address representation
2254	245	1	Rushden Town Council	1. Introduction	District-wide	Section 1.0	Status of Local Plan	General The Town Council is very supportive of a new Local Plan for the District of East Northants. In view of the changes which seem almost inevitable and that 2 new county unitary authorities will be formed, then it is considered very important that the plan is in place before the expected dissolution of ENC.	No further changes required - Generic rep/ comment
2308	246	4	Society of Merchant Venturers	1. Introduction	District-wide	Section 1.0	NPPF	National Planning Policy Context The National Planning Policy Framework 2018 (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three objectives of sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role.	No further changes required - Generic rep/ comment

2309	246	5	Society of Merchant Venturers	1. Introduction	District-wide	Section 1.0	NPPF	For plan making, Paragraph 11 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.	No further changes required - Generic rep/comment
2333	247	13	The Wildlife Trust	1. Introduction		para 1.15	Context	• With reference to Paragraph 1.15, on Page 6, of this same document, please note that we feel that, in this context, the most important and significant reference which needs to be extracted from, and highlighted within, the NPPF (of 24th July 2018) is the content of Paragraph 170, in Chapter 15, “Conserving and enhancing the natural environment”, on Page 49, where in Part d) it states : “170. Planning policies and decisions should contribute to and enhance the natural and local environment by : d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;” (please note our emboldening, for emphasis).	Additional evidence required to determine potential change/address representation
2369	250	2	Raunds Town Council	1. Introduction	District-wide	Section 1.0	Development management	The Town Council would like to see more stringent conditions placed on outline applications, to ensure that the final development is in keeping with the spirit of the outline consent.	No further changes required - this is not an issue directly related to the drafting of the Local Plan
2370	250	3	Raunds Town Council	1. Introduction	District-wide	Section 1.0	Development management	This council has considered a number of applications where the outline application shows an acceptable layout, but such substantive changes are made to the full/reserved matters application that the scheme now has no resemblance to the outline consent, however the presumption lies heavily in favour of approving the application as the principle of development for the site has been set.	No further changes required - this is not an issue directly related to the drafting of the Local Plan
2426	255	3	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Contents	3. Contents – it would be good to reference focus on key sectors here and in relevant section (ie Logistics, Visitor Economy, Construction and Life Sciences)	Proposed changes to text and/or policies - to address the issues raised in the rep.
2427	255	4	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Contents	4. Contents – not clear where strategic perspective will be picked up – maybe include as sub text – ie Ox Cam Arc, SEMLEP SEP, LIS etc	Proposed changes to text and/or policies - to reflect more clearly the strategic context
2428	255	5	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Contents	5. Contents – it would be helpful to include contact details of team	No further changes required - this is not an issue directly related to the drafting of the Local Plan
2429	255	6	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	6. Foreword – suggest we need better images of members and for these to be positioned at bottom along with signatures	Proposed changes to text and/or policies - Layout to be improved
2430	255	7	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	7. Foreword – first para – suggest add words “distinctive characteristics and” before “attractiveness” in last line	Proposed changes to text and/or policies - add wording as proposed
2431	255	8	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	8. Foreword – first para – suggest include more details about Joint Core Strategy (at least timeframe)	Proposed changes to text and/or policies - Additional text be added
2432	255	9	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	9. Foreword/ General – “Plan” need to be consistent case – either upper or lower	Proposed changes to text and/or policies - Layout to be improved
2433	255	10	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	10. Foreword – replace – “tourism” with “visitor” (and throughout document where relevant)	No further changes required - the wording proposed does not add value to the current plan.

2434	255	11	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	11. Foreword – last para - include reference of “blue” as well as “green spaces”	No further changes required- the foreword already addresses natural assets.
2435	255	12	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	12. Foreword – Nene Valley needs a specific mention as significant natural asset etc	Proposed changes to text and/or policies - Additional text to reflect the importance of the Nene Valley.
2436	255	13	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	13. Foreword – Suggest narrative needs to include reference to Ox / Cam Arc, enterprise, entrepreneurship, ENEC (as flagship project), quality (as writing in the rock) , headline number of jobs and homes, A14 as major economic corridor , place shaping and key sectors (current and emerging)	No further changes required- this is an emerging context more appropriate for the JCS as the strategic plan.
2437	255	14	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	14. Foreword/ General – Need to think about including some reference to local government review – looks conspicuous by its absence	No further changes required- this is not relevant to the drafting of the Local Plan
2438	255	15	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Foreword	15. Introduction/ General – need to include reference to longer term view to 2050 to put marker down for future work etc	No further changes required- this is not relevant to the drafting of the Local Plan
2439	255	16	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	para 1.14	Saved policies	16. Introduction 1.14 – will all saved policies be replaced?	No further changes required
2440	255	17	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Introduction	17. Introduction – context of Plan – suggest need reference to local government review and implications of new unitary approach etc	No further changes required- this is not relevant to the drafting of the Local Plan
2441	255	18	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Section 1.0	Introduction	18. Introduction – duty to co-operate - how about areas beyond NN?	No further changes required - Duty to co-operate has been addressed through the preparation of the evidence base
2442	255	19	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Figure .3	NN Context	19. Figure 3 – NN Context – need a better map – suggest something along lines of the one in Enterprising East Northants doc	No further changes - Map is taken from JCS, and is as appropriate
2443	255	20	ENC Head of Economic and Commercial Development	1. Introduction	District-wide	Figure .4	Key Diagram	20. Figure 4 / General – need better maps and to include keys – not very clear at the moment – these should help communicate the key messages – at the moment they don’t and in some cases just confuse the message	No further changes - Map is taken from JCS, and is as appropriate
2444	255	21	ENC Head of Economic and Commercial Development	2. Area portrait	District-wide	Section 2.0	Area Portrait	21. Area Portraits / General point – too text heavy – scope to use images/maps to convey key messages – need for graphic design input	Proposed changes to text and/or policies - Layout to be improved
2445	255	22	ENC Head of Economic and Commercial Development	2. Area portrait	Irthlingborough	para 2.15 - 2.19	Irthlingborough	22. Area Portraits – Irthlingborough – no mention of mine shaft issues	Proposed changes to text and/or policies - Additional text to reflect the rep be added..
2446	255	23	ENC Head of Economic and Commercial Development	2. Area portrait	District-wide	Section 2.0	Area Portrait	23. Area Portraits - scope to mention pubs as key heritage and public assets	Additional evidence required to determine potential change/address representation

2579	258	24	Biggin & Benefield Estate	2. Area portrait	Oundle	para 2.24	Oundle	Whilst we note that Paragraph 2.24 of the Draft Plan states that “a challenge for this Plan will be to ensure that the respective Neighbourhood and Local Plan policies will complement one another”, it is very evident that the two plans do not complement each other; certainly in terms of the Benefield Road site (which is allocated in the NP) there is no consistency at all.	Additional evidence required to determine potential change/address representation
2672	261	1	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	I cannot find any explanation of the site selection process in the documents released before Christmas. Can you direct me to the location of the alternative site option study that NCC carried out prior to identifying these sites as the only reasonable strategies for development.	No further changes required - Generic rep/ comment
2673	261	2	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In the report issued we have this statement:- 1.3 Identifying reasonable alternatives ...These sites have been identified through a review of available sites and an assessment of their sustainability. The allocation of these three sites is therefore one strategic approach to development in Oundle...For Option 1 a total of 300 homes are proposed at three sites...The Council did consider alternative site options to help aid the decisionmaking process...	No further changes required - Generic rep/ comment
2677	262	4	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	iv. The reasons for the objection to the inclusion of that site are: - The site assessments attach insufficient weight to the relevant policies in the “Made” Glaphorn Neighbourhood Plan (GNP)	Additional evidence required to determine potential change/address representation
2678	262	5	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- The site assessments take no account of the rural policies of the Joint Core Strategy	No further changes required - site assessments take into account a series of criteria, strategic policy guidance included.
2679	262	6	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- The site selections in Oundle (including the numbers proposed for this site) appear to be a tactical rather than strategic response to the housing numbers requirement and pay insufficient regard to the spatial, sustainability and community aspirations and needs of Oundle	No further changes required - site assessments take into account a series of objective criteria to address suitability..
2680	262	7	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- The site assessment pays no regard to the strength of the community views expressed in the compilation of the Glaphorn Neighbourhood Plan.	No further changes required - site assessments take into account a series of objective criteria to address suitability.
2681	262	8	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	2. Detailed Comments Underlying Objection to Inclusion of Site LPP2SA225 i. NNJCS Policy 3 (d) states “Development should ...protect the landscape and contribute to maintaining the individual and distinct character and separate identities of settlements by preventing coalescence”. The importance of avoiding coalescence was endorsed by 95% of Glaphorn respondents in the Neighbourhood Plan Community Questionnaire and hence no site allocations were made in the countryside between Glaphorn Village and Oundle.	No further changes required - site assessments take into account a series of objective criteria to address suitability. Coalescence is not considered not to be significantly compromised by the proposed site allocations

2682	262	9	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The importance of avoiding coalescence is stated in the Neighbourhood Plan Policy 8 (GNP 8). The site assessments make no reference to JCS Policy 3 (d) or GNP Policy 8, nor recognise the significance of these policies in evaluating the appropriateness of the site.	No further changes required - site assessments take into account a series of objective criteria to address suitability. Coalescence is not considered not to be significantly compromised by the proposed site allocations
2683	262	10	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	ii. The boundary between a rural parish and the adjacent town provides a logical and understandable basis for application of NNJCS Policy 3 (d) especially where alternative sites within the town boundary are available.	No further changes required - site assessments take into account a series of objective criteria to address suitability. Administrative boundaries are considered not to be significantly compromised by the proposed site allocations
2684	262	11	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	iii. Specific site assessments were an integral part of the GNP. Paragraph 6.8.1 of GNP states that "the assessment concluded that none of these sites (on the Glaphorn Oundle boundary) is needed to meet an identified housing need and all the locations raised concerns about their inappropriateness due to sustainability or suitability concerns." Given that the GNP was "made" (adopted) by ENC in July 2018, the Local Plan Part 2 should attach much more weight to the GNP Policies and conclusions and only vary from them if there are material considerations which are of sufficient importance to overturn such a recently adopted Plan.	No further changes required - site assessments take into account a series of objective criteria to address suitability.
2685	262	12	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	iv. The site assessment reports make no reference (or any consideration of) NNJCS Policy 11.2 (Development in Rural Areas). As such the assessments are partial in that they only consider the urban context (NNJCS Policy 11.1) and lack any attempt to strike a balance between rural and urban needs and policies.	Additional evidence required to determine potential change/address representation
2686	262	13	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	v. It is noticeable and very concerning that the AECOM report, for example, at paragraph 1.3.4 refers to the Oundle Draft NP as " Alongside the preparation of the Local Plan Part 2, a Neighbourhood Plan is being prepared by Oundle Town Council. A draft Plan has been prepared, which sets out a number of site allocations intended to meet identified housing needs. This combination of sites is different to those proposed in the draft Local Plan." The AECOM report gives no consideration to the Glaphorn Neighbourhood Plan despite the fact that as an adopted Plan it should be given more weight than a draft plan.	Additional evidence required to determine potential change/address representation
2687	262	14	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	vi. All sites within Glaphorn which have been considered should have been explicitly evaluated against both GNP Policies and GNP Objectives. The Objectives are clearly set out in the GNP at Section 4 and include Housing and Landscape / Character Objectives such as Obj 1 To support modest residential development ... Obj 4 To ensure any developments adjacent to the Parish Boundary with Oundleare consistent with priorities for development identified in conjunction with Oundle Town Council Obj 9 To ensure the area of separation between the village of Glaphorn and Oundle is maintained in both physical and visual terms.	Additional evidence required to determine potential change/address representation

2688	262	15	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The site assessment reports do not reflect the fact that the made Glaphorn Neighbourhood Plan is, by statute, already an integral part of the Development Plan of the area.	No further changes required - site assessments take into account a series of objective criteria to address suitability.
2689	262	16	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	vii. Too much weight is attributed to the somewhat oblique reference in the RNOTP at paragraph 8.18 to the "possible longer-term site allocation" in respect to the site East of Cotterstock Road. This seems to be taken as an implied commitment when the wording clearly does not justify such an interpretation.	No further changes required - site assessments take into account a series of objective criteria to address suitability.
2690	262	17	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	viii. Glaphorn Parish Council supports the draft policies in the draft Oundle Neighbourhood Plan regarding multiple small site housing developments located as close to the town centre as possible. Glaphorn residents are dependent upon Oundle as the shopping and service centre and consider the policy intentions are important in creating a sustainable future for the town for the benefit of town residents and users from the surrounding rural areas.	No further changes required - site assessments take into account a series of objective criteria to address suitability.
2691	262	18	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	ix. It is noted that the site appraisals attach weight to the fact that larger sites give greater potential for a higher proportion of affordable housing. It should also be noted that whilst the GNP specifically did not include the site (in Glaphorn) East of Cotterstock Road, the GNP did acknowledge that this might be an appropriate site should an application be forthcoming under NNJCS Policy 13 on Rural Exceptions.	No further changes required - site assessments take into account a series of objective criteria to address suitability.
2692	262	19	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Indeed, the GNP refers (paragraph 6.8.3) to that aspect of the NNJCS Policy 13 which acknowledges that some market housing maybe acceptable to make a rural exceptions scheme commercially viable. It is suggested that this provides a viable alternative to the use of three large sites as the means of increasing the supply of affordable housing.	No further changes required -rep is a generic statement
2693	262	20	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	3. Comments on Individual Site Assessments within Glaphorn Parish i. Site LPP2SA7 (153 Glaphorn Road); this site was proposed for the GNP and relates to a parcel of land in addition to that already developed. As this site is for only 3 or 4 houses, its use is non-strategic and should be a matter for a future Neighbourhood Plan. Appendix 2 to ENC report should denote this as within Glaphorn.	No further changes required -rep is a generic statement
2694	262	21	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	ii. Site LPP2SA44 (Rays Field); this site was rejected in the GNP. The site was identified but not actively promoted and was considered to have little merit for development as it is not compliant with NNJCS or GNP Policies. Appendix 2 to ENC report should denote this as within Glaphorn.	Additional evidence required to determine potential change/address representation
2695	262	22	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	iii. Site LPP2SA64 (off Glaphorn Road). This site was identified in the call for sites but was withdrawn from consideration in the GNP process and acknowledged as inconsistent with NNJCS and GNP Policies. Appendix 2 to ENC report should denote this as within Glaphorn.	Additional evidence required to determine potential change/address representation
2696	262	23	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	iv. Site LPP2SA117 (parcel fronting Cotterstock Road within Primary School Grounds). This includes a small slice of land within Glaphorn Parish. As a small site appropriate for determination within a Neighbourhood Plan, NCC (Education) were given the opportunity to promote its inclusion within the GNP but chose to withdraw it from consideration. As it is outside the settlement boundary of Glaphorn, this site should not be considered for development during the period of the current GNP.	Additional evidence required to determine potential change/address representation
2697	262	24	Glaphorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	v. Site LPP2SA223 (west of Cotterstock Road). Glaphorn Parish Council concurs with the conclusion that this site should be discounted as a potential site allocation.	No further changes required - supporting rep

2698	262	25	Glapthorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	vi. Site LPP2SA225 (Land off Cotterstock Road). Appendix 2 to ENC report should denote that a significant portion of this site is within Glapthorn. As noted above, the Parish Council objects to the inclusion of that part of this site lying with Glapthorn Parish and in particular to the extent of development proposed.	No further changes required - the administrative boundaries are not an overriding factor in selecting sustainable site allocations
2699	262	26	Glapthorn Parish Council	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The developers had previously proposed development of 60 houses (split evenly between the Glapthorn and Oundle parish areas) and this would be more acceptable to Glapthorn, as would consideration of development under NNJCS Policy 13 (Rural Exceptions).	Additional evidence required to determine potential change/address representation
2706	263	7	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Further Objections to proposed building of around 100 houses on the St Christopher's Drive site (alongside the A605 and Behind St Christopher's Drive and Rowell Way,Oundle) following late publication of ENC's Site Assessment Documents for Oundle (Submitted Document under Public Comments on the Draft East Northamptonshire Local Plan Part 2, from local residents adjacent to the proposed site. Ref. Pages 42-45 of Local Plan Background Paper – Oundle Site Assessments which, although dated November 2018 was not made available to the public for comment until early January2019)	No further changes required - site assessments take into account a series of objective criteria to address suitability.
2707	263	8	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Overall the November site assessment is not consistent with the National Planning Policy Framework on making Local Plans and identification of sites for allocation. It is not based on "adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area and does not represent the most appropriate strategy when considered against the reasonable alternatives" as the Framework requires.	Additional evidence required to determine potential change/address representation
2708	263	9	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Significant constraints of the site have not been adequately represented or are absent. Important wider implications for Oundle development have not been addressed due to the site-specific focus.	Additional evidence required to determine potential change/address representation
2709	263	10	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The relevant sections of the document Evidence and Objections to Proposed building St Christopher's Drive 10 Dec 2018 are updated below.	No further changes required - Generic rep/ comment
2710	263	11	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The evidence for each of these points is detailed in the Appendix which is based on the Local Site Assessment with two columns added: <ul style="list-style-type: none"> • ADEQUATE, UP-TO-DATE AND RELEVANT COMMENTS supported by • DETAILED EVIDENCE from "Evidence and Objections to Proposed Building_St ChristophersDrive submitted to ENC 10 December 2018" 	No further changes required - Generic rep/ comment
2711	263	12	Member of the public	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	These should be read in conjunction with previous submitted objections (Evidence and Objections to Proposed Building_St Christophers Drive_10 Dec 2018).	No further changes required - Generic rep/ comment
2740	264	2	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	As we highlight in our submissions of 21 December 2018 the process in motion appears to cut across the well- advanced proposals for the neighbourhood plan. The SA Report appears to comprise an ex post facto justification of the Local Plan proposals. The attached response relates more specifically to the interim SA Appraisal and the ENC Site Assessment document and should be considered alongside our earlier representations.	Additional evidence required to determine potential change/address representation
2741	264	3	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	We believe the SA document is poorly framed in terms of the limited range of options it considers, seemingly in order to dismiss the Neighbourhood Plan proposals. The assessment methodology is considered to be flawed, and there are quite fundamental errors and inconsistencies in the way that the sites have been assessed and appraised.	Additional evidence required to determine potential change/address representation
2742	264	4	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Likewise, the site appraisal document contains significant flaws that have skewed the outcomes in favour of the Council's preferred sites.	Additional evidence required to determine potential change/address representation

2743	264	5	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	As a result, we consider the process to be fundamentally flawed in this case. Collectively these flaws go to the overall soundness of the Local Plan and the Local Plan process. We believe, for the reasons outlined in our previous submissions, that there is scope to accommodate the Neighbourhood Plan proposals within the overall Local Plan framework; delegating allocation decisions to the Neighbourhood Plan or, to re-consider the preferred sites.	Additional evidence required to determine potential change/address representation
2746	264	8	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	1. SUSTAINABILITY APPRAISAL: INTERIM SA REPORT STRATEGIC OPTIONS FOR OUNDLE: DECEMBER 2018 (AECOM) Overview The timing of the publication of the document is unfortunate. The document purports to comprise an Interim Sustainability Appraisal report. Its publication after the publication of the Draft Plan Consultation leaves the impression that the document has been prepared as a means of justifying the preferred approach rather than serving as a document intended 'to inform the selection, refinement and publication of proposals' (NPPG: Para.018).	Additional evidence required to determine potential change/address representation
2747	264	9	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Moreover, only two options are considered within the SA document; the Council's preferred approach (as set out within the Draft Local Plan), and the proposals as set out within the Draft Oundle Neighbourhood Plan. No other 'reasonable alternatives' have been considered; something that might reasonably be expected, and this leaves the impression that the primary intent of the document is to critique and reject the Neighbourhood Plan proposals, whilst simultaneously justifying the Local Plan proposals.	Additional evidence required to determine potential change/address representation
2748	264	10	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	That there are some significant errors and inconsistencies within the document that re-inforce this view. We have serious concerns about the credibility and reliability of this document as a background document. This lack of credibility goes to the soundness of the plan and the plan-making process.	Additional evidence required to determine potential change/address representation
2749	264	11	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The followings comments are made on the content of the document Section 2: Housing Strategy for Oundle Para.1.3.3: The document states; 'The council did consider alternative site options to help aid the decision making process. However, no other 'strategies' for development were identified as reasonable.' If other alternative site options have been considered, then these should form part of the Sustainability Appraisal. The fact that the document acknowledges that other options have been considered, but that these do not form part of the SA, calls into question the very robustness of the assessment.	Additional evidence required to determine potential change/address representation
2750	264	12	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3: Appraisal findings Section 3.2 Accessibility In terms of accessibility considerations, several factors warrant consideration; proximity to town centre services and facilities, proximity to other services, pedestrian accessibility, and public transport accessibility. In relation to the latter point, the only public transport service of note passing through Oundle is the X4 Peterborough – Northampton service. This is a high quality, high frequency service that enters the town from the A605 along Station Road and North Street and exiting via Benefield Road, towards Corby.	Additional evidence required to determine potential change/address representation
2751	264	13	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	As the attached timetable information makes clear, between Peterborough and Corby, the service calls at all bus stops. In the context of the site appraisal, it is relevant to note that there are bus stops on Station Road, North Street (Kings Road), Market Place, West Street and Benefield Road (2 stops).	No further changes required - factual comment
2752	264	14	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	We would estimate the distances from the various sites and those bus stops to be as follows; Stoke Doyle Road - West Street - 700m Cotterstock Road - Market Place / North Street - 1600m St Christophers Drive - Market Place / North Street - 900m Herne Road - Market Place - 580m Millers Field - Benefield Road - 0m Wakerley Close - Benefield Road - 260m Benefield Road - Benefield Road - 190m	No further changes required - factual comment
2753	264	15	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	This suggests that the 3 preferred sites actually perform relatively badly in terms of public transport accessibility. The Miller's Field, Benefield Road and Wakerley Close sites are the only sites that allow easy access to the town centre from outlying areas, as well as commuting to higher order centres such as Peterborough, Corby and Northampton.	Additional evidence required to determine potential change/address representation

2754	264	16	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Public transport accessibility should be given a significant weighting given the quality and frequency of the services and its suitability for links into the town centre and as an intra-urban transport choice for both work and otherneeds.	Additional evidence required to determine potential change/address representation
2755	264	17	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In this context the Stoke Doyle Road site is commended in terms of public transport accessibility; (Para.3.2.1: 'there is a relatively frequent bus service that is located approximately 700m from the development site'). Even though the Cotterstock Road is assessed to be 1.4km to the nearest bus stop (we actually assess it to be over 1.6km), this is still positively commended (Para.3.2.2: 'Though the site is 1.4km to the nearest bus stop ; a frequent service runs to Peterborough , Corby and Northampton').	Additional evidence required to determine potential change/address representation
2756	264	18	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The distinction between 'relatively frequent ' in the Stoke Doyle Road case, and 'frequent' in the case of Cotterstock Road is questionable, given that they describe the same bus route and service. In relation to the St. Christopher's Road site there is no reference at all to public transport accessibility (3.2.3) despite it being notably closer to the service than the Cotterstock Road site.	Additional evidence required to determine potential change/address representation
2757	264	19	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In relation to the Option 2 sites, no reference is made to the fact that the Millers Field site adjoins Benefield Road bus stops in each direction (3.2.10), and no reference is made to the fact that the Wakerley Close site is only 260m from bus stops (3.2.8) and the Benefield Road North site is less than 200m from the same bus stops (3.2.11). Indeed, in terms of the Option 2 sites there is no consideration of public transport accessibility at all.	Additional evidence required to determine potential change/address representation
2758	264	20	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Given that it is demonstrably the case that the Option 2 sites appear to perform better in terms of public transport accessibility than the Option 1 sites, the overall accessibility conclusion, that the Option 2 sites perform more poorly('moderate negative effects'(3.2.5) compared to 'minor negative effects'(3.2.15)) is questionable. Indeed, the argument can reasonably be made that these scorings should be reversed.	Additional evidence required to determine potential change/address representation
2759	264	21	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In relation to Site 23: Land South of Wakerley Close, the document states that 'Currently the site is landlocked and there is no access route unless the neighbouring landowner sells off some land to generate an access road.'(3.2.10) You will be aware that the Wakerley Close proposals contemplate an access drive running to the west of the existing Wakerley Close estate; something AECOM are obviously not aware of. The access road land is in the same ownership as the main body of the site. The site is not landlocked and the assessment is therefore incorrect.	Additional evidence required to determine potential change/address representation
2760	264	22	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In relation to the land north of Benefield Road it is suggested that the site is 'significantly disconnected from the current town centre along A427' (3.2.11). Similar comments are made in respect of the Wakerley Close site (3.2.10). We disagree with that assessment.	Additional evidence required to determine potential change/address representation
2761	264	23	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The site is certainly not disconnected from the built form of the settlement; Wakerley Close sits to the south of the site. The site is actually closer to the town centre than the Cotterstock Road site, with good footpath access. Some town centre facilities on West Street are actually much closer.	Additional evidence required to determine potential change/address representation
2762	264	24	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In relation to the Option 1 sites the overall conclusion at Para. 3.2.4 is that 'all of the sites are on the edge of the built up area of Oundle, therefore the means of transport will be more heavily weighted towards the use of the private car. However, the sites are located within walking distance of some local services and are not too distant from the town centre'. Thus, Cotterstock Road is deemed to be 'not too distant from the town centre', whereas Benefield Road and Wakerley Close – which are actually closer - are deemed to be 'fairly distant' from the town centre (3.2.10 & 3.2.11).	Additional evidence required to determine potential change/address representation
2763	264	25	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In our view, these differences illustrate a clear favouring / pre-disposition towards the preferred Option 1 sites over the Option 2 sites, despite the fact that the evidence in very many instances actually supports the Option 2 sites. The different standards used to assess the different sites (evidenced by the different terminologies), undermines the credibility of the assessment and the document as a whole.	Additional evidence required to determine potential change/address representation

2764	264	26	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The assertion that the Benefield Road North site is 'significantly disconnected' from the town centre (3.2.11) (and later at 3.4.16 that the site is 'not directly connected to the current built up environment'), is contradicted later in the report (3.9.10), where it is stated that 'Though it is a large site on the edge of the settlement boundary, it would be opposite existing residential development of fairly recent construction.' In this respect it is clearly connected. On the same issue, the report is demonstrably contradictory.	Additional evidence required to determine potential change/address representation
2765	264	27	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In our view, the overall accessibility conclusions in respect of the Option 1 and option 2 sites are not justified. Indeed, as we indicate above, there is a clear argument for the overall cumulative effects and scoring to be reversed.	Additional evidence required to determine potential change/address representation
2766	264	28	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.3 Housing There is little explanation of how the comparative scores of the Option 1 and Option 2 sites has been reached. Whilst the Option 1 sites have an overall 'significant positive effects' score (3.3.5), the Option 2 sites are deemed to score only 'minor positive' effects (3.3.15).	Additional evidence required to determine potential change/address representation
2767	264	29	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In relation to the Option 1 sites the overall conclusion is that 'development of these three sites creates an opportunity to deliver a greater mix of housing types and tenures to meeting the community needs. Each site would reach the affordable housing threshold, therefore resulting in each site (if viable) resulting in a 40% provision of affordable housing. The sites are all considered to be deliverable, and are of a scale that would supportnewinfrastructureprovision'(3.3.5).	Additional evidence required to determine potential change/address representation
2768	264	30	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	There is no demonstrable evidence to back up the assertions made. No consideration has been given to viability matters. No consideration appears to be given to the ability of sites to deliver a mix of house types and sizes. No indication has been given of what 'the community needs'.	Additional evidence required to determine potential change/address representation
2769	264	31	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In relation to the Option 2 sites the analysis is demonstrably less thorough, and the overall assessments brief. In relation to the land north of Benefield Road, the document suggests (3.3.13), that the site will deliver 120 larger homes (executive homes), albeit that the site will also be expected to deliver 40% affordable housing in line with policy requirements.	Additional evidence required to determine potential change/address representation
2770	264	32	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The actual mix of housing to be delivered on the site has not been determined at this stage, and indeed, this will be determined through planning policy. The conclusion that 'the mix of housing is likely to be lower, and less beneficial to those with affordability problems' (3.3.13) is not justified. There is nothing to suggest the site would only comprise executive type homes, and indeed, in our view the site is capable of being considered in equivalent terms to the Option 1 sites in terms of what it is capable of delivering.	Additional evidence required to determine potential change/address representation
2771	264	33	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	By the same measure it can be viably developed, and is deliverable. There is clear evidence of a market demand for the site from developers. There has been no dialogue with AECOM on these matters and in the circumstances they cannot reasonably reach informed conclusions about the site.	Additional evidence required to determine potential change/address representation
2772	264	34	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In overall terms the SA appears to be assessing the sites on the basis of two options only. The analysis is in our view weak, and lacks substance. At this stage in the plan process there is clearly an ability, through policy, to dictate the form and type of development that should be accommodated in on each site.	Additional evidence required to determine potential change/address representation
2773	264	35	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The limitation of the appraisal to only two options almost deliberately skews the results. The SA should instead have considered the individual merits of each site, or to have considered further options and site combinations that also achieve the overall housing requirement. For example, a further option could include a combination of the St Christophers Drive site, the Stoke Doyle Road site and the Benefield Road site. Other options could include other combinations of sites.	Additional evidence required to determine potential change/address representation
2774	264	36	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Comparison of two options only does not generate sound overall conclusions, particularly if there is an opposition to one site within one of the Options. This will inevitably skew the overall result, even if all the other sites perform well.	Additional evidence required to determine potential change/address representation

2775	264	37	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	It is noted that the Council's own site assessment methodology chooses not to distinguish between the housing merits of each site.	Additional evidence required to determine potential change/address representation
2776	264	38	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.4: Health and Liveability This section actually scores the Option 2 sites over the Option 1 sites.	Additional evidence required to determine potential change/address representation
2777	264	39	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	There are a number of inaccuracies in the assessment. In relation to the Benefield Road site, it is suggested that 'the site is not directly connected to the current built up environment of Oundle (3.4.16)'. This is incorrect. The site is adjoined on its southern side by Wakerley Close (a point later acknowledged at 3.9.10).	Additional evidence required to determine potential change/address representation
2778	264	40	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The adjoining development to the west comprises part of the wider Oundle School campus, which is an integral part of the overall built up area. The site is not disconnected. The 'festival field, it is suggested will have its own separate access (3.4.16). There is no suggestion that the site would have a separate access.	Additional evidence required to determine potential change/address representation
2779	264	41	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Whilst the Benefield Road site is claimed to be some distance from local facilities and the health centre, and those facilities are thus less likely to be accessed on foot (3.4.18), in practical terms it is a similar distance to those facilities as the preferred Stoke Doyle Road site, and closer to the health centre than the St. Christopher's Drive site. In relation to these two Option 1 sites, there is no discussion or assessment about accessibility to healthservices.	Additional evidence required to determine potential change/address representation
2780	264	42	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.5: Crime There is no distinction between the two options in relation to this consideration.	Additional evidence required to determine potential change/address representation
2781	264	43	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.6: Community Value This section actually scores the Option 2 sites over the Option 1 sites.	Additional evidence required to determine potential change/address representation
2782	264	44	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.7: Biodiversity There is no distinction between the two options in relation to this consideration.	Additional evidence required to determine potential change/address representation
2783	264	45	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.8: Landscape The Option 1 sites are considered to have 'minor negative effects' in respect of the landscape (3.8.4), and the Option 2 sites are considered to be 'slightly more negative' (3.8.15). The report acknowledges that the negative effects of the Option 2 sites are still not likely to be significant and are 'moderate' in nature, rather than 'minor'. It is also suggested that there is a degree of 'uncertainty' (3.8.15).	Additional evidence required to determine potential change/address representation
2784	264	46	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Again, as with earlier sections, the degree of analysis of the Option 2 sites appears cursory by comparison to the Option 1 sites; skewed very much in favour of the Option 1 sites. Whilst as part of the Option 1 site assessments there is a consideration of mitigation measures (3.8.1, 3.8.2 and 3.8.3) in each case, in respect of the Option 2 suites there is no such consideration.	Additional evidence required to determine potential change/address representation
2785	264	47	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	It seems reasonable to concluded that if a commensurate assessment were undertaken in respect of the Option 2 sites, including a consideration of any mitigation in each case, similar overall conclusions would be reached in terms of landscape impacts for both options. There is a clear bias in the assessment towards the Option 1 sites.	Additional evidence required to determine potential change/address representation
2786	264	48	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The Option 2 sites have been scored down due to uncertainty. This appears to be based upon uncertainty about densities and site yields. There need not be uncertainty on this matter if the options are appropriately defined. Policy measures can define development parameters for each site, and eliminate uncertainty. Uncertainty should not be a determinative factor in this assessment.	Additional evidence required to determine potential change/address representation

2787	264	49	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.9: Cultural heritage Section 3.10: Climate change Section 3.11: Air quality Section 3.12: Water & Natural Hazard There is no distinction between the two options in relation to these considerations.	Additional evidence required to determine potential change/address representation
2788	264	50	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	We would however anticipate some air quality issues in relation to the St. Christopher's Road site, give its proximity to the A605. Sustainable sites with good public transport options may be considered to offer some air quality benefits when compared to equivalent sites without public transport access (where the greater use of the car may be expected).	Additional evidence required to determine potential change/address representation
2789	264	51	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.13: Soil and Land The distinctions between the two options in this case appear very minor indeed, and we would question the differential scoring in relation to this consideration.	Additional evidence required to determine potential change/address representation
2790	264	52	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.14: Minerals There is no scoring distinction between the two options in relation to these considerations. However, it is noted that whilst all of the Option 1 sites are identified as falling within a Minerals Safeguarding Area, in relation to Option 2 most of the sites fall within the safeguarding, suggesting that some sites fall outside of it. In the same way that relatively minor differences may affect the scoring (for example under Section 13 above), this difference ought reasonably skew the result in favour of the Option 2 sites.	Additional evidence required to determine potential change/address representation
2791	264	53	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Section 3.15: Energy Use & Waste Section 3.16: Employment & Wealth Creation & Skills Section 3.17: Town Centre There is no distinction between the two options in relation to these considerations.	Additional evidence required to determine potential change/address representation
2792	264	54	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Conclusions Paragraph 3.18.1 recognises that the two strategic options 'perform relatively the same across the range of sustainability topics'.	Additional evidence required to determine potential change/address representation
2793	264	55	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The only areas where there appears to be differences, are; - Section 3.2: Accessibility: In relation to this consideration we consider the assessment to be flawed. There are inconsistencies and errors within the assessment and this has clearly impacted on the scoring. In our view, there is a clear case for the two scores being reversed, in favour of the Option 2 proposals.	Additional evidence required to determine potential change/address representation
2794	264	56	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- Section 3.3 Housing: the assessment in this case appears skewed entirely in favour of the preferred Option 1 sites. The analysis in respect of the Option 2 sites is superficial and based on unsound assumptions.	Additional evidence required to determine potential change/address representation
2795	264	57	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- Section 3.4: Health and Liveability: This favours the Option 2 sites	Additional evidence required to determine potential change/address representation
2796	264	58	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- Section 3.6: Community Value: This favours the Option 2 sites	Additional evidence required to determine potential change/address representation
2797	264	59	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- Section 3.8: Landscape: The analysis in this instance is skewed in favour of the Option 1 sites. There is no consideration of mitigation measures in respect of the Option 2 sites. With appropriate mitigation considered the two options would in our view be scored equally.	Additional evidence required to determine potential change/address representation
2798	264	60	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- Section 3.13: Soil and Land: The distinctions in this case are not considered to be sufficient to justify different scoring between the two options.	Additional evidence required to determine potential change/address representation

2799	264	61	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	- Section 3.14: Minerals: The fact that not all of the Option 2 sites are within a Minerals safeguarding Area, would suggest that a differential scoring may be appropriate.	Additional evidence required to determine potential change/address representation
2800	264	62	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In our view, the assessment in this case is flawed. It demonstrably shows a predisposition towards the Option 1 sites and this is visibly reflected in the differential assessments between the Option 1 and Option 2 sites. The scoring results are in many cases questionable and unjustified.	Additional evidence required to determine potential change/address representation
2801	264	63	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Published towards the expiry of the consultation period, the document presents as an ex post facto justification for the Local Plan, and a simultaneous rejection of the Neighbourhood Plan. Sustainability Appraisal is intended to inform policy not to retrospectively justify it, which is what this document appears to be doing. In these respects it must be seen to represent an unsound document and one that must ultimately go to the whole soundness of the Local Plan.	Additional evidence required to determine potential change/address representation
2802	264	64	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	2.LOCAL PLAN PART 2: BACKGROUND PAPER: OUNDLE SITE ASSESSMENTS Overview The relationship between this document and the preceding document is not altogether clear. It would appear that this document is a background document to the Local plan, and explains the rationale for shortlisting the three preferred sites for allocation. There is a measure of overlap between this document and the Aecom SA document andsomeinconsistencies.	Additional evidence required to determine potential change/address representation
2803	264	65	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	As a basis for shortlisting sites, we consider the document to be weak and extremely generalised. Of the 22 selection criteria used, 9 of them are incapable of distinguishing the merits of the candidate sites, and this must call into question their effectiveness. Several other criteria identify very few distinctions between the sites.	Additional evidence required to determine potential change/address representation
2804	264	66	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The distinction between the scoring categories appears vague and imprecise in many instances. The comparative treatment of sites is also in many instances questionable. In many instances an assumption about performance relative to a criterion results in a negative score, whilst in other instances it does not. The relative weightings of the criterion are not considered or explained. Assessment criteria forming part of the sustainability appraisal – such as community value are not considered. Capacity assumptions are not justified and do not follow through into the allocation proposals.	Additional evidence required to determine potential change/address representation
2805	264	67	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The assessment criteria Appendix 4 sets out the assessment criteria to be utilised in the site assessments.	Additional evidence required to determine potential change/address representation
2806	264	68	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Accessibility Five separate accessibility criteria are referenced in the documents. In relation to Proximity to Services, Page 5 sets out a fairly detailed scoring methodology, with different scorings for access to different facilities such as employment, health care, primary school, leisure centres, and local shops. Whilst the document outlines that the assessment of employment sites includes an assessment of public transport accessibility and proximity to convenience shopping, these were not matters considered as part of the residential site assessment.	Additional evidence required to determine potential change/address representation
2807	264	69	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	As we have highlighted above, the AECOM assessment, in considering the sustainability of sites, assessed the public transport accessibility of sites, and considered it to be an important consideration. We consider the absence of any consideration of public transport accessibility is an important omission. Public transport accessibility is an issue that should be afforded significant overall weight.	Additional evidence required to determine potential change/address representation
2808	264	70	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The AECOM assessment also gave some consideration to the proximity of sites to town centre services and facilities, and as we illustrate above it is quite feasible to assess the relative merits of sites based upon accessibility andproximityconsiderations.	Additional evidence required to determine potential change/address representation

2809	264	71	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Other factors warranting consideration are public footpath connections, accessibility to footpath and cycleways etc, as well as the potential for the enhancement of such facilities as part of any development.	Additional evidence required to determine potential change/address representation
2810	264	72	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	We believe these factors are able to create the basis for a reasonable comparative assessment of the shortlisted sites. The assessment, by assigning equal scores to all sites has failed to do so.	Additional evidence required to determine potential change/address representation
2811	264	73	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	However, it does not seem unreasonable to factor in westbound connectivity towards Corby (via the A427) as part of any assessment (we note that the assessment methodology engaged in this case was one that was originally utilised for a broader site assessment process covering both employment and residential sites). The Oundle site assessment process has highlighted the inadequacies of utilising the same methodology for a town specific assessment for a smaller town like Oundle. The overall assessment methodology appears unfit for purpose.	Additional evidence required to determine potential change/address representation
2812	264	74	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Connectivity to the existing urban area. The description of the assessment methodology on Page 6 sets out the basis for the assessment, as applied previously in a different context by the JPU. The assessment in this case seems to have sidestepped any discussion about whether the scoring methodology is correct or appropriate to assessing / comparing Oundle sites, by assigning all sites the same score.	Additional evidence required to determine potential change/address representation
2813	264	75	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Rather than admitting that all sites perform equally well in terms of connectivity, the scoring in our view is an admission that the methodology, whilst appropriate at a higher strategic level, does not translate well to an assessment of sites at a small-town level. It seems quite evident in this case that some sites perform better than others in terms of relationship to the settlement and accessibility. The suggested scoring references issues of 'connectivity' and 'integration' although there is no elaboration of what these terms actually mean, or how they might be applied for the purposes of comparing sites.	Additional evidence required to determine potential change/address representation
2814	264	76	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Housing. The site assessment template on Page 7 suggests that 'all housing sites are likely to offer similar opportunities to meet this objective – it has not therefore been used as a criterion for choosing between sites.' This completely contradicts the approach in the AECOM SA appraisal, where sites are differentiated on the basis of various factors, including uncertainties about how sites might come forward and whether they may be able to meet housing targets.	Additional evidence required to determine potential change/address representation
2815	264	77	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Efficiency of land use (in terms of site densities and yields) are also considered in the AECOM report. The different approach between the two documents is not explained. Moreover the capacity assessments for sites set out in this document contrast markedly with the actual site allocations and the figures comprised in the AECOM assessment. Given that site yields assume a greater importance in the SA appraisal, the significant variations in capacity have not been adequately explained.	Additional evidence required to determine potential change/address representation
2816	264	78	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact upon sports and recreation facilities. All sites with the exception of those that directly result in the loss of sports pitches have been scored equally. The loss of an existing sports facility clearly represents a valid basis to score down a site, although it seems reasonable to consider the scope for replacement or enhanced facilities (which has not taken place). All sites that are not existing sports pitches are scored equally. Sites with existing facilities are scored 'red'.	Additional evidence required to determine potential change/address representation
2817	264	79	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The scoring matrix on Page 7 suggests that 'the strategic sites are of sufficient scale to suggest that on sites where there are existing facilities provision could be either retained or alternative site facilities could be provided. In such instances an amber score has been applied to recognise the constraint and the likelihood that mitigation measures would be possible'.	Additional evidence required to determine potential change/address representation

2818	264	80	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	No explanation is give as to what is meant by 'strategic sites'. The explanation makes no sense in an Oundle context, as none of the sites have been given an 'amber' score and none other than the two red-scored sites sites presently have any existing sports and recreation facilities. This again suggests the scoring methodology has been imported for use from elsewhere, where its use was perhaps more appropriate.	Additional evidence required to determine potential change/address representation
2819	264	81	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	No consideration has been given to the potential for sites to deliver enhanced sports and recreation facilities. For example, it has been a consistent element of the Benefield Road North proposals to provide some form of community open space of a sufficient size to host town-wide community events, as well as serving as a public open space area. This represents a positive aspect of this particular site and one that would warrant differentiation (and a higher score) than sites that weren't delivering similar facilities of wider community benefit.	Additional evidence required to determine potential change/address representation
2820	264	82	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Similarly, the Stoke Doyle Road site has been identified as offering the potential for a cemetery extension; something that would warrant recognition under this factor, or another factor such as the 'community value' criterion used in the SA assessment but absent from the site assessment.	Additional evidence required to determine potential change/address representation
2821	264	83	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Other facilities being offered by sites, such as enhanced footpath / cycles and connectivity to existing networks (as particularly offered by the Benefield Road North site) have not been factored into the assessment.	Additional evidence required to determine potential change/address representation
2822	264	84	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Proximity to modifiable installations. All of the sites score equally against this consideration. It is quite evident that there are no notifiable installations in the vicinity of the town. This criterion better represents a basis to eliminate sites from a long list of candidate sites. It has no relevance in this instance as a basis for comparing a short list of sites.	Additional evidence required to determine potential change/address representation
2823	264	85	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Crime. As with the AECOM study, all sites are scored equally. There is no methodology for assessing sites against this consideration in either case. It relevance as a selection criterion must therefore be questioned.	Additional evidence required to determine potential change/address representation
2824	264	86	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Community. The SA Objective in this case is 'Value and nurture a sense of belonging in a cohesive community whilst respecting diversity'. The Scoring matrix on Page 21 states that 'All sites may offer opportunities to contribute towards this objective - it has not therefore been used as a criterion for choosing between sites'.	Additional evidence required to determine potential change/address representation
2825	264	87	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In the same way that the SA has distinguished between the community value of sites and what they may deliver, so it is not unreasonable to score sites on the basis of what they may deliver or the community and what they deliver in terms of cohesiveness. The assessment process is undermined by the absence of any consideration of this matter.	Additional evidence required to determine potential change/address representation
2826	264	88	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact of noise and odour. Whilst this factor represents a reasonable basis to assess and compare sites, although there are potentially other factors that may impact upon the general living environment of future residents. We note that in this case, against the two factors used to assess and compare sites, inconsistent scoring arises. Cotterstock Road West is scored 'amber' on the basis of its proximity to a school. Cotterstock Road East is scored 'amber' on the basis of its proximity to the sewage treatment works (no reference is made to its proximity to the school even though parts of the site have a similar proximity to Cotterstock Road West).	Additional evidence required to determine potential change/address representation
2827	264	89	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	By contrast, the St Christopher's Drive and Herne Road sites, which are both acknowledged to be exposed to noise from the A605 are scored 'green' on the basis of mitigation that may be required / provided. In the St. Christopher's Road case, no reference has been made to the proximity to the adjoining school or the adjoining employment uses. Thus, mitigation measures are factored into the scoring for 2 proposals and not into two others.	Additional evidence required to determine potential change/address representation
2828	264	90	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Sites have been inconsistently scored against the same consideration. In none of the cases has any evidence been brought to bear to determine whether the impacts are acceptable or not. The assessment criteria offer no basis for determining the severity or acceptability of the impact. Proximity to a sewage treatment works, or, exposure to unacceptable noise levels could represent reasonable grounds for exclusion from a short list.	Additional evidence required to determine potential change/address representation

2829	264	91	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact of the development upon neighbouring land uses. All of the sites are scored equally against this consideration. All sites have been given an 'amber' score. The explanation on Page 7 is that the 'amber' score is applied where there is the potential for adverse impact.	Additional evidence required to determine potential change/address representation
2830	264	92	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	There is a stock phrase for each site suggesting that the sites are 'compatible with neighbouring land uses subject to the need for mitigation measures indicated elsewhere within this assessment'. In our view this assessment criteria has not been fully considered or explored. The St Christopher's Drive site, for example, adjoins an existing industrial area.	Additional evidence required to determine potential change/address representation
2831	264	93	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact upon biodiversity. All of the sites have been scored equally in relation to this consideration.	Additional evidence required to determine potential change/address representation
2832	264	94	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact upon protected species or on a site of wildlife importance. The distinctions between the green and amber scorings are not explained within the assessments. Some green scoring relies upon 'indications' from developers that there are no constraints, although there is no evidence that all of the site owners have been consulted or asked for information in relation to this matter.	Additional evidence required to determine potential change/address representation
2833	264	95	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	In relation to the Stoke Doyle Road site, a 'green' flagged response states that 'Indication from developer that the geo-physical survey reveals no major constraint.' A geo-physical survey is generally undertaken to determine the likely presence of archaeological remains. It does not inform about the presence or otherwise of wildlife or protected species. Likewise it is unlikely to inform about the presence of noted geological (as opposed to archaeological) features. There is no evidence in this case that a level playing field has been utilised to assess the relative potential of sites.	Additional evidence required to determine potential change/address representation
2834	264	96	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	It is not clear why two separate biodiversity based scorings have been identified in this instance.	Additional evidence required to determine potential change/address representation
2835	264	97	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact on visual landscape. The scoring for this criterion appears to be derived from earlier studies, although the precise scoring of sites does not appear to completely correspond. Moreover the scoring and assessment appears to differ from the approach of AECOM within their SA assessment.	Additional evidence required to determine potential change/address representation
2836	264	98	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Also to be factored into this criterion, as it appears not to be considered elsewhere in the assessment, is the extent to which the development sites impact on the separation between settlements.	Additional evidence required to determine potential change/address representation
2837	264	99	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	This is especially relevant in the context of the Cotterstock Road sites which would be likely to compromise the existing separation between Oundle and Glapthorn. There are Neighbourhood Plan policies that oppose developments that would compromise the separation. This is a landscape impact consideration as well as a built form consideration. It is clear that this has not been factored into the overall assessment.	Additional evidence required to determine potential change/address representation
2838	264	100	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	No consideration appears to have been given to landscaping or the scope to mitigate the effects of any development proposals. This is significant, as the proposed allocations flowing from the assessment include landscape mitigation elements within the allocations and this has clearly informed the allocation decisions.	Additional evidence required to determine potential change/address representation
2839	264	101	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact on heritage / listed buildings conservation areas, scheduled ancient monuments and historic parks and gardens. Scoring of sites is broadly similar. However, The Benefield Road site has been scored 'red' in relation to each consideration. It is described as 'essentially an area of high sensitivity' and 'heritage asset on the site as an identified area of ridge and furrow, and important landscape and heritage classification in the area'.	Additional evidence required to determine potential change/address representation
2840	264	102	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Whilst there is some evidence of ridge and furrow on part of the Benefield Road site, it is not a designated heritage asset and there is no evidence that the site comprises a non-designated heritage asset on a local list. Equally there is no evidence that the existence of the ridge and furrow represents a barrier to the development of the site.	Additional evidence required to determine potential change/address representation

2841	264	103	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Significant parts of the Benefield Road site do not comprise ridge and furrow. There are many other examples of ridge and furrow, both on the Biggin & Benefield Estate and elsewhere in the locality. It is not a rarity. An archaeological assessment has been forwarded to the local planning authority as part of our earlier submissions.	Additional evidence required to determine potential change/address representation
2842	264	104	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	It is not clear why two separate heritage-based scorings have been identified in this instance. It is not considered to serve any purpose and one overall scoring may be more appropriate.	Additional evidence required to determine potential change/address representation
2843	264	105	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact on the existing form of the settlement. Page 9 of the document suggests that this criterion focuses upon 'the likelihood of coalescence, the impact on prominent views or vistas, detachment from the settlement and the opportunity to enhance gateways'. The assessments of individual sites however appear to pay no regard to the issue of coalescence.	Additional evidence required to determine potential change/address representation
2844	264	106	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The Cotterstock Road sites are impacted by the prevention of coalescence policy within the Glaphorn Neighbourhood Plan, but this is not referenced at all within the assessment hand has no impact on the scoring (The Cotterstock Road East site has a 'green' score).	Additional evidence required to determine potential change/address representation
2845	264	107	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The Benefield Road North site is described as being 'separated from the main built up area'. This is incorrect. To the south it is adjoined by the Wakerley Close development. To the east it is adjoined by school land. Whilst that land is not intensively developed, it nevertheless forms part of the overall built up area of the town. The AECOM report acknowledges that the site is physically connected (3.9.10).	Additional evidence required to determine potential change/address representation
2846	264	108	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	New development inevitably has some measure of change upon the existing built form. Any assessment should consider the overall impact of any development, including any potential mitigation that a site can deliver.	Additional evidence required to determine potential change/address representation
2847	264	109	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Flood risk. Flood risk matters are generally matters that should form part of a high level sift of sites. If sites pass that high level appraisal, there should be no need or justification to further appraise them in terms of flood risk considerations. The sites perform broadly comparably in relation to flood risk considerations.	Additional evidence required to determine potential change/address representation
2848	264	110	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Previously developed land. This is not a factor that distinguishes between the shortlisted sites as they are all greenfield sites.	Additional evidence required to determine potential change/address representation
2849	264	111	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Agricultural land. This is not a factor that distinguishes between the shortlisted sites as they all have the same broad land classification.	Additional evidence required to determine potential change/address representation
2850	264	112	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Impact on the stock of minerals. Whilst the scoring appears to align with the Minerals Consultation area designations, it is important to note the development proposals proximate to safeguarded areas may impact upon the potential exploitation of resources. Thus, minerals safeguarding applies typically not only to the designated areas but also to land in the vicinity. This would effectively bring all Oundle sites with the same categorisation.	Additional evidence required to determine potential change/address representation
2851	264	113	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Availability and deliverability. Availability and deliverability have been inconsistently assessed across the sites. Some assessments clearly rely upon information supplied (or sought) from landowners, whilst others do not. There appears to have been no direct, recent communication with landowners to determine availability and deliverability. The conclusions as such are not considered reliable. For example, in relation to the Benefield Road North site, there is expressed developer interest in the site and the site is readily available.	Additional evidence required to determine potential change/address representation
2852	264	114	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Sites and site capacities. The identified sites in this case are in some cases larger than the sites considered as part of the neighbourhood Plan and Local Plan. For example, the Benefield Road North site comprises the overall site and not constituent elements.	Additional evidence required to determine potential change/address representation

2853	264	115	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Likewise, the Benefield Road South site is a composite of two separate sites; one to the south of Wakerley Close and a large parcel to the west of Wakerley Close. What is clear in this instance is that separate consideration of these sites as smaller sub-divisions is likely to have resulted in different scorings and different overall conclusions.	Additional evidence required to determine potential change/address representation
2854	264	116	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The capacity figures set out in the summary table on Page 25 includes some questionable capacity assumptions.	Additional evidence required to determine potential change/address representation
2855	264	117	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The Cotterstock Road East site for example, has been assessed with a capacity of 87 dwellings. The summary assessment of the site (on Page 56) states 'landscape impact has been identified as the most significant development constraint. This could be addressed through reducing the developable area and suitable landscaping along the most sensitive boundaries'. However, rather than reducing the amount of development, the proposed site allocation actually increases the overall site capacity from 87 dwellings to 130 dwellings.	Additional evidence required to determine potential change/address representation
2856	264	118	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The Stoke Doyle Road site is assessed as delivering 200 dwellings, whereas only 70 dwellings are now proposed to be allocated.	Additional evidence required to determine potential change/address representation
2857	264	119	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	The Benefield Road North site is identified as having a capacity of 355 dwellings. Whilst this may reflect the capacity of the overall site, sites considered as part of the Oundle NP have generally focused on a part of the site rather than the overall site.	Additional evidence required to determine potential change/address representation
2858	264	120	Biggin & Benefield Estate	1. Introduction	District-wide	para 1.25 - 1.26	Sustainability Appraisal	Conclusions In overall terms, it is considered that there are very significant shortcomings both in terms of the assessment criteria that have been adopted and the conclusions reached in applying those assessment criteria. These shortcomings and errors go to the fundamental soundness of the documents and the proposed housing allocations that flow from them. On the basis of the above submissions, it seems clear that different scoring outcomes would result.	Additional evidence required to determine potential change/address representation
2878	278	2	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	I am concerned that negative impact factors have been minimised with respect to the proposed chosen site for development LPP2 SA225 Land East of Cotterstock Road/ North of St Peters Road (site 225). In comparison, other sites have been discounted due to very similar potential constraints.	Additional evidence required to determine potential change/address representation
2879	278	3	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Flood risk Site 225 is rated green for flood risk – Entire site situated in flood zone 1 with mention made of the watercourse adjacent to the Northern site boundary. No mention is made of the fact that the lower part of the site is approximately 50m from flood risk zone 2, which is metres away from the start of flood risk zone 3.	Additional evidence required to determine potential change/address representation
2880	278	4	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The southern end of St Peters Road (houses 71-75) are adjacent to zone 2, as is the rugby club. It is likely that a large development on site 225 will increase the risk of flooding to these nearby areas, as the field currently provides 5.6Ha of land for rain to soak into. The removal of topsoil in a development site will increase surface water run-off and will be combined with the additional impact of the diversion of groundwater that would be necessary to build on this site.	Additional evidence required to determine potential change/address representation
2881	278	5	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	When assessing site 218 (Land at St Peters Road) you have designated this Amber for flood risk though the distances and impacts are similar.	Additional evidence required to determine potential change/address representation
2882	278	6	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Visual Impact Site 225 is designated amber for visual impact. This is despite the site being visible and adjacent to the footpaths both along the edge of the field, and on the opposite bank of the river, which are frequently used by ramblers and dog walkers. The site will be visible from the river by those travelling by boat. The site is highly visible from the A605 when driving towards Oundle from Peterborough.	Additional evidence required to determine potential change/address representation

2883	278	7	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	A new build housing estate has a very different visual impact to the current network of small roads adjacent to the proposed site, so I fail to see why this has not been designated red for visual impact, when you have designated red sites 220 (North of Benefield road), 221 (Herne Road) – due to being close to the river Nene and visual impact on approach to the town.	Additional evidence required to determine potential change/address representation
2884	278	8	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Sites 241 (South of Benefield Road) and 223 (West of Cotterstock Road) are also rated red for visual impact despite the fact that they are not visible from the river or public footpaths. Site 223 is not visible from A605 and site 241 if developed would be in keeping with the new estates already built at this edge of the town.	Additional evidence required to determine potential change/address representation
2885	278	9	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	I feel your comments minimise the impact, which would be considerable, and I dispute that a smaller allocation would alleviate this impact, due to the site being on a hill.	Additional evidence required to determine potential change/address representation
2886	278	10	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Impact of existing noise or odour Site 225 has been designated amber for this category, but the effect of building so close to the sewage works has been negated in the comments section, as you state 'There are no identified issues of odour affecting the site'. However when you comment on the adjacent site 44 (p28) there does seem to be an issue with 'the adjacent treatment works having the potential to impact the quality of life of the residents.'	Additional evidence required to determine potential change/address representation
2887	278	11	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	As you will have read in the letters sent to you by residents of Cotterstock Road and St Peters Road, there is already significant odour when the wind is blowing towards the town, and our properties are a lot further from the treatment works than the proposed development. In addition, this odour has become more prominent in the past 15 years with increased development in the town and adding new houses will only increase the sewage load on the works.	Additional evidence required to determine potential change/address representation
2888	278	12	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Other sites such as 241 and 220 seem preferable as there are no issues with odour or noise.	Additional evidence required to determine potential change/address representation
2889	278	13	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Impact on biodiversity, protected species and wildlife. When considering this impact on site 225, mention is made of the water course and hedgerows but it is stated impact on protected species unknown. The RSPB red list of endangered birds includes the cuckoo, yellowhammer and sparrow (tree and house), all of which live around this site. Local residents, myself included, can hear the call of the cuckoo every spring from this field. This habitat should be protected to help the survival of these declining species.	Additional evidence required to determine potential change/address representation
2890	278	14	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The protected site Snipe meadow is close by and will be impacted by the change in flow of groundwater and flood water caused by development.	Additional evidence required to determine potential change/address representation
2891	278	15	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Site 220 has no nearby areas designated for wildlife.	Additional evidence required to determine potential change/address representation
2892	278	16	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Impact on the existing form of the settlement Site 241 has been discounted as 'it is an extension to the built up area with no development to north or south... development would extend the built form of the town'. In this section, Site 220 states it is on the western edge and separated from the main built up area' which is given as a reason for discounting it.	Additional evidence required to determine potential change/address representation
2893	278	17	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	However, it is clear to see site 241 would be an extension of building in a westerly direction, continuing from Lytham Park and Wakely Close - estates that have received planning permission in the recent past despite this extending the town west. Any development that is not infill will extend the town and site 241 is no worse for development in this respect than site 225 which also would have 3 new boundaries going into countryside.	Additional evidence required to determine potential change/address representation

2894	278	18	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	I fail to see why 220 and 241 have been designated red 'extending built form into sensitive countryside beyond' when this same impact applies to site 225.	Additional evidence required to determine potential change/address representation
2895	278	19	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	In conclusion, I feel the factors outlined above regarding site 225 Land East of Cotterstock Road should be reviewed again as the impact of development on this site has been underestimated.	Additional evidence required to determine potential change/address representation
2896	278	20	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The impact of building on site 241 along Benefield Road has been overestimated and this site should not have been discounted at this early stage. In addition, the Benefield Road sites are on the bus route from Corby to Peterborough, which passes through the market place, whereas site 225 is a 20 minute walk to the nearest bus stop.	Additional evidence required to determine potential change/address representation
2901	279	3	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	2. I totally disagree that Site 225 development would have an 'Amber' visual impact due to its highly elevated location. Viewpoints from East, West and the South would be adversely affected. Such development would also be out of character with the low density of the existing housing along St Peters Road.	Additional evidence required to determine potential change/address representation
2902	279	4	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	3. Site 225 proposed development would have a regrettable impact on the environment both within the site and the adjoining river meadows to the south, especially the protected Snipe Meadow. These meadows are fast becoming a rare feature within the Nene Valley landscape along with their dependency to endangered birdlife, also flora and fauna generally. Groundwater seepage/flows from site 225 to these areas are key to their waterlogged state.	Additional evidence required to determine potential change/address representation
2903	279	5	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	4. My previous written comments (please refer 2004; 2006 and Dec 2018) relating to groundwater spring flows etc. within this site are still relevant. Geology does not change with time, only the human influences of development and practices over the area of natural annual rainfall recharge, in this case relating to an important local minor limestone aquifer.	Additional evidence required to determine potential change/address representation
2904	279	6	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	5. Please reconsider the recognised flaws in your assessments with serious reconsideration of the well formed Neighbourhood Plan which the residents of Oundle believe is more favourable to the nature of a historic Market Town.	Additional evidence required to determine potential change/address representation
2912	283	1	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Summary The basis of the ENC Local Plan in relationship to Oundle housing locations is flawed. There are major errors in the descriptions of sites that were discounted from the analysis. We therefore believe that the process needs to be repeated.	Additional evidence required to determine potential change/address representation
2913	283	2	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	No consideration has been given to the green space and facility benefits of certain sites identified in the Oundle Neighbourhood Plan.	Additional evidence required to determine potential change/address representation
2917	283	6	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Analysis The assessment document states at 1.2 that the assessment has been undertaken "to ensure that development takes place in sustainable locations to ensure that allocated sites will enhance the sustainability of existing settlements and to enable unsuitable sites to be filtered out"	Additional evidence required to determine potential change/address representation
2918	283	7	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The criteria for site assessment used in this assessment based on the NPPF include: a. physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution and contamination b. potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation and c. environmental/amenity impacts experienced by would be occupiers and neighbouring areas.	Additional evidence required to determine potential change/address representation
2919	283	8	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We have considered the way in which the site assessments have been determined and submit that the methodology used by Oundle Town Council in its determination of site allocations for its draft Neighbourhood Plan is at least as valid as that used by ENC in its assessment. The town council had expert advice in this area from Maroon Planning in developing and implementing its site assessment methodology.	Additional evidence required to determine potential change/address representation

2920	283	9	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We would further submit that some of the site assessments by ENC are flawed with the result that the proposed allocation of sites for residential development in Oundle in the draft Local Plan has not resulted in the allocation of the most suitable sites.	Additional evidence required to determine potential change/address representation
2921	283	10	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The draft Local Plan is required to assess that all reasonable site alternatives have been considered (2.1) but in respect of two of the three sites allocated (Stoke Doyle Road and Cotterstock Road/ St Peters Road) their assessments conclude with the following statement: "the longer term development potential is already recognised in the current plan (RNOTP) such that the allocation of the site in the replacement local plan part 2 would represent a logical continuation to the adopted policy".	Additional evidence required to determine potential change/address representation
2922	283	11	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	It appears that despite the existence of better/alternative sites there was, therefore, a degree of predetermination in relation to these two sites.	Additional evidence required to determine potential change/address representation
2923	283	12	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The relevant wording in the Rural North Oundle and Thrapston Plan regarding these two potential sites was as follows: "the sustainability assessment work has identified two particular sites which stand out as possible longer term site allocations. These sites which could come forward following reviews of the Core Strategy and the plan are Land to the rear of the cemetery, Stoke Doyle Road (230 dwellings capacity) Land off Cotterstock Road/ St Peters Road (200 dwellings capacity)."	Additional evidence required to determine potential change/address representation
2924	283	13	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The word "possible" is not in italics in RNOTP but we have highlighted it to emphasise that it was not envisaged in that plan that either of these sites would/should be automatically allocated for residential development in any replacement plan.	Additional evidence required to determine potential change/address representation
2925	283	14	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	One site assessed as being suitable for residential development in RNOTP and allocated for development within it has not yet been the subject of an application for planning permission namely Dairy Farm, Stoke Hill (20 dwellings). Interestingly this site is no longer assessed as being sustainable for future residential development in the current assessment although nothing appears to have changed to justify this. It is submitted that on this basis a decision could be reached that either or both of the sites referred to above at Stoke Doyle Road and Cotterstock Road/St Peters Road could on reassessment no longer be considered suitable for residential development.	Additional evidence required to determine potential change/address representation
2926	283	15	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Our concern is that ENC approached the issue of site assessments from the wrong starting position by assuming that the Stoke Doyle Road and Cotterstock Road/St Peters Road sites should be allocated for residential development in the draft Local Plan thus making it necessary to negatively assess other sites.	Additional evidence required to determine potential change/address representation
2927	283	16	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	A further concern is that the site off St Christopher's Drive having been subject to an unsuccessful application for planning permission by virtue of not being allocated for residential development in the RNOTP and by virtue of the existence at the material time of a demonstrable five year land supply was although rightly assessed as suitable for residential development included in the sites allocated in the draft Local Plan without its suitability as against all other sites having been properly assessed.	Additional evidence required to determine potential change/address representation
2928	283	17	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	In relation to both the Stoke Doyle Road site and the Cotterstock Road/St Peters Road site the impact on visual landscape is rated AMBER. In fact all of the sites subject to detailed assessment were rated AMBER except for the land off St Christopher's Drive which was rated GREEN and three sites rated RED namely land north of Benefield Road, land either side of Herne Road and land west of Cotterstock Road.	Additional evidence required to determine potential change/address representation
2929	283	18	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We would not argue with the rating for the site off St Christopher's Drive but do dispute a. land west of Cotterstock Road which we would rate as AMBER b. land east of Cotterstock Road which we would rate as RED	Additional evidence required to determine potential change/address representation

2930	283	19	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We cannot see how the visual impact of 'a' could be assessed as greater than the visual impact of site 'b' and feel that the latter is significantly greater than the former and that the visual impact of site 'b' is worse than any and all of the other assessed sites. c. land north of Benefield Road which we would rate as AMBER d. land south of Benefield Road which we would also rate as AMBER	Additional evidence required to determine potential change/address representation
2931	283	20	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We do not feel that the impact of site 'c' is significantly worse than that of site 'd'. e. land either side of Herne Road which we would rate as AMBER.	Additional evidence required to determine potential change/address representation
2932	283	21	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We would make the following site-specific comments on the ENC assessments: LAND EAST OF COTTERSTOCK ROAD AND NORTH OF ST PETERS ROAD This site should have been subject to a negative assessment rather than a positive one and should not have been allocated for any large-scale residential development.	Additional evidence required to determine potential change/address representation
2933	283	22	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The assessment fails to note that part of this site lies within the parish of Glapthorn and that that part of this site is not allocated for residential development in that village's adopted neighbourhood plan. Development of that part of the site would lead to coalescence and any housing built there would be wholly isolated from the built form of Glapthorn village.	Additional evidence required to determine potential change/address representation
2934	283	23	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The impact on visual landscape of residential development on this site is considerably understated in the site assessment. It is incorrect to describe the site as "on some undulating land down to a watercourse (the River Nene)" as the whole site slopes sharply down to the river. It is unlikely that the detrimental impact of any residential development on this site could be adequately mitigated by "suitable landscaping along the most sensitive boundaries".	Additional evidence required to determine potential change/address representation
2935	283	24	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The assessed flood risk fails to take into account the unusual ground water flows and springs affecting this site which is sometimes waterlogged that led Anglian Water to object to the residential development of this site as long ago as 1986 in their submissions on the then Oundle Draft Plan.	Additional evidence required to determine potential change/address representation
2936	283	25	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Although the assessment correctly states that the site is "within proximity of Oundle Sewage Works" (sic) it is incorrect in stating that there are no identified sources of odour affecting this site, residents of St Peters Road are well aware of the nuisance caused by the Sewage Works. The impact on those living closer to it if the site were to be developed would be not inconsiderable.	Additional evidence required to determine potential change/address representation
2937	283	26	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The assessment suggests that the site is deliverable as it is in single ownership and actively promoted but fails to take into account the existence of restrictive covenants, which do not allow the residential development of much of this site.	Additional evidence required to determine potential change/address representation
2938	283	27	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Key potential opportunities are overstated in the assessment by virtue of duplication namely: "site is recognised as a potential development site in the current local plan and is being actively promoted" and "development potential is already recognised in current local plan".	Additional evidence required to determine potential change/address representation
2939	283	28	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We do not accept that because the site was wrongly assessed and identified as a possible site for future residential development in the RNOTP despite local opposition it should now be accorded some kind of priority status when being assessed for inclusion in the new Local Plan.	Additional evidence required to determine potential change/address representation
2940	283	29	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	LAND NORTH OF BENEFIELD ROAD The site is described in the assessment as being separate from the current built form of the settlement but this overlooks the fact that the northern boundary of this site abuts an existing residential development and that the site lies opposite the development at Wakerley Close. The site could equally easily be described as a logical extension to the existing built form of Oundle along and off the Benefield Road. It is certainly an overstatement to describe this site as "poorly related to the main built form of the urban area".	Additional evidence required to determine potential change/address representation

2941	283	30	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We do not accept the assertion in the assessment that the site would have a high and therefore detrimental impact on the landscape setting nor that the residential development of this site would have "a significant detrimental impact on the existing form of the settlement". There is little opportunity for further residential development in Oundle that would not involve greenfield development extending beyond the existing built form of the town.	Additional evidence required to determine potential change/address representation
2942	283	31	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The impact of the residential development of this site on the ridge and furrow landscape could be lessened by restricting the amount of the site to be developed as proposed in the draft Oundle Neighbourhood Plan and requiring any development to retain an area of green space for community use within the site. In this context it should be noted that the site promoter has agreed to do so in connection with the allocation of part of this site for residential development within the draft neighbourhood plan.	Additional evidence required to determine potential change/address representation
2943	283	32	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The site is comfortably big enough to accommodate the entire future residential development required in Oundle by the Core Strategy but limiting development in the way proposed in the draft neighbourhood plan would preserve a significant part of the site if this is considered necessary because of any heritage asset status.	Additional evidence required to determine potential change/address representation
2944	283	33	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	LAND EITHER SIDE OF HERNE ROAD It is wrong to treat this as a single site as was done in the SHLAA. The only land being actively promoted for development lies south of Herne Road with the remainder of the site on the other side of the road needing to be retained for use by the Prince William School.	Additional evidence required to determine potential change/address representation
2945	283	34	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The promoted site is in single ownership and is actively promoted for residential development and has been assessed by the Town Council as suitable for some residential development. Concluding that "the whole of the site includes the school and playing fields and this part (north of Herne Road) as essential infrastructure is therefore undeliverable" is misleading.	Additional evidence required to determine potential change/address representation
2946	283	35	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We do not accept that residential development on this site would have a high impact on the landscape setting and would assert that the visual impact of this site is less than some and no more than many of the other assessed sites.	Additional evidence required to determine potential change/address representation
2947	283	36	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	To satisfy the requirements of the Core Strategy it will be necessary for future residential development to take place on greenfield sites which extend the built form of the town into the countryside. Any visual impact of the residential development proposed for part of the site would be mitigated by the developer's proposal to make available to the town a significant parcel of the land in question for use as a cricket club.	Additional evidence required to determine potential change/address representation
2948	283	37	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	LAND SOUTH OF BENEFIELD ROAD The assessed constraints are that the site is isolated from the existing built up area but this is incorrect and misleading as the site is bordered by existing residential development on its eastern boundary and part of the site (that proposed for allocation in the draft neighbourhood plan) is bordered to the north by Wakerley Close.	Additional evidence required to determine potential change/address representation
2949	283	38	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Limited residential development on that part of the site proposed in the draft neighbourhood plan would, therefore, represent a minimal intrusion into the countryside and would simply 'square off' the town's western boundary. Access could be gained by a new access road from Benefield Road bordering the Wakerley Close development.	Additional evidence required to determine potential change/address representation
2950	283	39	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	If the site north of Benefield Road was to be allocated for residential development then this site as a whole could be viewed almost as an extension of that site and it would be sensible to view that part of the site not proposed for allocation in the draft neighbourhood plan as having future development potential beyond the period of the proposed Local Plan.	Additional evidence required to determine potential change/address representation
2951	283	40	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We do not accept that residential development on this site would have a high and detrimental visual impact on the landscape setting and would assert that the visual impact of this site is less than some and no more than many of the other assessed sites. To satisfy the requirements of the Core Strategy it will be necessary for future residential development to take place on greenfield sites which extend the built form of the town into the countryside.	Additional evidence required to determine potential change/address representation

2952	283	41	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	LAND BETWEEN 22 AND 24 BENEFIELD ROAD The site has been discounted because it is considered to be "too small" for allocation. We do not think that excluding this site is sensible as it represents virtually the only opportunity to allocate land for residential development in Oundle that would essentially be infilling.	Additional evidence required to determine potential change/address representation
2953	283	42	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Although the site is small it is well situated and closer to the town centre than other sites. It could be allocated for small specialist housing for which it would be well suited. In the draft neighbourhood plan the development of this site would give significant planning gain with the provision of much needed allotments and a small green amenity area by the brook. Housing could be sited in such a way as to create a developed frontage to the street – far enough away from the brook to avoid any flood risk – whilst preserving views through the housing towards Stoke Doyle Road.	Additional evidence required to determine potential change/address representation
2954	283	43	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	LAND BETWEEN ASHTON ROAD AND HERNE ROAD Given that Dairy Farm, Stoke Hill was reassessed despite being allocated for residential development in RNOTP but being as yet undeveloped we are not sure of the logic for apparently excluding from the site assessments that part of the above site currently allocated for residential development in RNOTP which is as yet undeveloped.	Additional evidence required to determine potential change/address representation
2955	283	44	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	There would, however, be an argument for stating that neither site should be considered deliverable unless planning permission is sought and obtained prior to 2021 and the expiry of RNOTP on the basis of the current allocation of these sites.	Additional evidence required to determine potential change/address representation
2956	283	45	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	LAND OFF ST CHRISTOPHERS DRIVE The problems with road access are under stated in the summary. The detailed content points out that access via only the 5.5m wide Sutton Road is not possible and that a second access off the Ashton Road Bridle Way would be required. It also states that "Ashton Road would need to be widened significantly". This could only be achieved by a significant reduction in hedgerow and green barrier to the industrial estate.	Additional evidence required to determine potential change/address representation
2957	283	46	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Even with a reduction of the hedgerow the report states that a transport assessment is required, which is not an insignificant risk since this is the only major site with a single point of access. This bottle neck at Ashton Road also covers the housing estates of Ashton Manor and Old School Avenue. The number of 120 houses understates the true number served from the Ashton Road/East Road junction, which is already over 150.	Additional evidence required to determine potential change/address representation
2958	283	47	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Further, noise from the A605 is dismissed in a single statement that "Mitigation will be required", yet no consideration is given as to whether such mitigation is viable.	Additional evidence required to determine potential change/address representation
2959	283	48	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Flood risk. The site is rated as River Flood risk 1, ie low. There is no discussion of the impact of reducing natural drainage in the two zones reported to be at "high risk" of surface water flooding.	Additional evidence required to determine potential change/address representation
2960	283	49	Oundle Town Council	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Foul water sewage is a significant problem at this end of town, and, although manageable, the developer will have to take into account the cost of a major sewage system design change.	Additional evidence required to determine potential change/address representation
3030	288	1	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	I have read the Oundle Strategic Options Assessment and am of the opinion that there is very little in it for you to insist on the use of Council' plan over and above our Local Plan. 3.18.6. seemed to be significant. "the approach has been developed by the community"	Additional evidence required to determine potential change/address representation
3031	288	2	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	I also fail to understand why larger sites would benefit affordable housing when the same number could be accommodated over the smaller sites, thus giving more choice of area for potential buyers. Again I ask you to seriously consider what we would prefer.	Additional evidence required to determine potential change/address representation

3032	289	1	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	I'd like to express and record my concern over the detail and quality of information within the East Northamptonshire Local Plan (Part 2) Sustainability Appraisal: Interim SA Report Strategic options for Oundle (December, 2018). The report reads to me as being vague, unsubstantiated and misleading.	Additional evidence required to determine potential change/address representation
3033	289	2	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Two key points: 1. In the context of potential or likely effects, there is no definition of 'significance'. 2. In the context of mitigating for potential or likely impacts, there are no examples given of mitigation, for any circumstance, whether it be e.g. increased traffic or the loss of biodiversity.	Additional evidence required to determine potential change/address representation
3034	289	3	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Some of the terminology used is worrying in its unprofessionalism, for example: 3.4.15 The number of residents that would benefit would be 'really small'.	Additional evidence required to determine potential change/address representation
3035	289	4	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	With reference to the following statement, i'm sure that any open green space (even regularly maintained playing fields) that is lost to housing will inherently result in a net loss of (negative effect on) biodiversity, before considering mitigation and compensation: 3.7.9 Site 21 - Policy 0.21 - Millers Field, Benefield Road - The location and scale of site is 'unlikely to generate effects on biodiversity either positive or negative'. How is that judgement substantiated? How is such a loose statement even helpful?	No further changes - Generic comment
3036	289	5	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The report aims to 'help influence the plan-making process'. Given the key concerns I have highlighted, the fact that the information in this report is likely to influence the plan (decision)-making process is very worrying. I look forward to your response.	No further changes - Generic comment
3037	290	1	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	East Northamptonshire Local Plan Part 2: Draft Plan Consultation Interim Sustainability Appraisal Report - Strategic Options for Oundle I am writing in regard to the Draft Local Plan Part 2, which was the subject of a period of public consultation from 2 November 2018 until 17 December 2018. Following this period of consultation, it has come to my attention that the Council has, in recognition of representations received, chosen to publish an 'Interim Sustainability Appraisal Report' relating to the 'Strategic Options for Oundle' (Interim SA Report) and that this has been made available for comment until 18 February 2019.	Additional evidence required to determine potential change/address representation
3038	290	2	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Gladman are aware that the Council previously published a Sustainability Appraisal Scoping Report and a Habitats Assessment Screening Opinion for representations alongside its Regulation 18 Consultation Document which ran from 27 January 2017 until 13 March 2017. It is also noted that the Interim SA Report, at paragraph 1.1.5, makes it clear that it does not constitute an 'SA Report' as defined by the SEA Regulations and that this will be made available when the Plan is published at the Regulation 19 stage in due course.	Additional evidence required to determine potential change/address representation
3039	290	3	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	A Site Assessment Report for Oundle has also previously been published, which considers a wide range of site options and is dated November 2018. From the work that has been published to date, Gladman recognise that the Local Plan Part 2 is being prepared alongside a sustainability appraisal process and that the approach that is being taken by the Council will have the ability to meet the requisite legal compliance requirements as the plan progresses. This will of course ultimately need to be demonstrated through the SA Report that is published for comment at the Regulation 19 Stage.	Additional evidence required to determine potential change/address representation
3040	290	4	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	This letter provides the observations of Gladman Developments Limited (Gladman) on the "East Northamptonshire Local Plan (Part 2) Sustainability Appraisal: Interim SA Report Strategic Options for Oundle, December 2018".	Additional evidence required to determine potential change/address representation
3041	290	5	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Land at Cotterstock Road, Oundle As the Council will be aware, Gladman is promoting the East of Cotterstock Road site that is referenced in the Interim SA Report and fully supports the proposal within the Draft Local Plan Part 2 to include it as an allocation for 'around 130 dwellings'.	Additional evidence required to determine potential change/address representation

3042	290	6	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The site has the ability to perform well against the sustainability objectives of the emerging Part 2 Local Plan and can be brought forward in a manner that meets the emerging requirements that have been set out in draft policies EN24 and EN26. Our representations that were submitted during the consultation period that ended on 17 December 2018 include a summary of findings from technical work that we have carried out on the site to date and highlights a number of key benefits that extend across all three strands of sustainable development.	Additional evidence required to determine potential change/address representation
3043	290	7	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Interim Sustainability Appraisal Report – strategic options for Oundle In our previous response to the Local Plan Part 2, we noted that the Council is working with AECOM to undertake the SA in parallel with the Plan's preparation. As you will be aware, the process of undertaking the SA and any associated reporting should clearly justify the local plan's policy choices, including the proposed site allocations and the approach taken to managing growth when judged against 'all reasonable alternatives'.	Additional evidence required to determine potential change/address representation
3044	290	8	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	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 why others have been rejected. The Council's decision making and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative.	Additional evidence required to determine potential change/address representation
3045	290	9	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The Interim SA Report that has now been prepared by AECOM focuses on one specific element of Local Plan Part 2, relating to options for the allocation of land for housing at Oundle to meet the requirements of the adopted North Northamptonshire Core Strategy (NNCS). In this regard, the Interim SA Report provides a number of judgements in assessing two options against previously identified 'SA Topic Areas'. Option 1 is the preferred option contained in Local Plan Part 2 and Option 2 is taken from an emerging Neighbourhood Plan for Oundle, which has been identified as a reasonable alternative.	Additional evidence required to determine potential change/address representation
3046	290	10	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The Report finds that Option 1 provides the opportunity to deliver a greater mix of housing types and tenures at deliverable sites that are all above the threshold for requiring 40% affordable housing and of a scale that would support new infrastructure provision. It therefore predicts that there will be significant positive effects against the 'Housing SA Topic', an assessment with which Gladman agrees.	Additional evidence required to determine potential change/address representation
3047	290	11	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	In contrast, the Report identifies that Option 2 proposes site allocations that: do not appear to make for the most efficient use of land; that may not meet the housing target in full; and, that are of a scale that do not present the same opportunities for the delivery of affordable housing, or a greater mix of housing types. Despite this uncertainty, the assessment predicts that Option 2 would have minor positive effects in the context of the 'Housing SA Topic'.	Additional evidence required to determine potential change/address representation
3048	290	12	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	At this stage, the assessment indicates that there is uncertainty regarding the likely performance of Option 2 against the 'Housing SA Topic'. As a result, Gladman would recommend that the outcome of the Option 2 assessment is amended to a '?' score.	Additional evidence required to determine potential change/address representation
3049	290	13	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The assessment that is made within the 'Landscape SA Topic' under Option 1 indicates that Land East of Cotterstock Road could result in minor negative landscape effects. Through our response to the Council's previous consultation, an indicative development layout and a brief summary of our 'Landscape Value Impact Assessment' for the site were provided.	Additional evidence required to determine potential change/address representation
3050	290	14	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Those submissions highlighted that the site can be sensitively masterplanned within its landscape setting, that the proposals are well related to the existing edge of Oundle and that the site's development would represent a contained, logical extension that is compatible with the existing settlement pattern. Taking this into account, Gladman consider that it would be reasonable to conclude that any negative effects regarding landscape can be avoided at Land East of Cotterstock Road and within Option 1 as a whole. This would result in Option 1 being given a 'neutral' overall prediction within the Council's SA Report.	Additional evidence required to determine potential change/address representation

3051	290	15	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	With regard to the 'Soil and Land SA Topic', Gladman wishes to highlight an apparent error in the text at 3.13.15, which indicates that Option 2 would result in a minor negative effect. The approach set out in Option 2 spreads development across a wider range of sites than Option 1 and would therefore have a greater impact on agricultural land in the surrounding area. As a result, the associated negative effects would be of a greater scale under Option 2 than under Option 1.	Additional evidence required to determine potential change/address representation
3052	290	16	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The supporting text at 3.13.15 should therefore be updated to state 'moderate negative effect'. This change would ensure that paragraph 3.13.15 reflects the scoring that is already set out in the table at 3.12 and in the 'Summary of Effects Table' on page 29 of the Report.	Additional evidence required to determine potential change/address representation
3053	290	17	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	In relation to the 'Community Value SA Topic', Gladman wishes to highlight the finding that Option 1 would provide a greater level of open space and social infrastructure than Option 2 and that it is consequently capable of achieving a 'minor positive effect' rating of '+' against this SA Topic.	Additional evidence required to determine potential change/address representation
3054	290	18	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The Interim SA Report indicates, through its 'Summary of Effects' on page 29 and 30 that both strategic options perform at a similar level across the range of sustainability topics that have been identified (paragraph 3.18.1). However, this does not seem an accurate reflection of the overall SA scoring, which undoubtedly finds that Option 1 outperforms Option 2 across the SA Topics when viewed as a whole.	Additional evidence required to determine potential change/address representation
3055	290	19	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	It would therefore be reasonable for the text in this section to be amended to reflect this outcome. Whilst the observations in this letter would act to improve the overall outcome for Option 1 against Option 2, a conclusion that Option 1 would outperform Option 2 would be valid irrespective of whether the 'Summary of Effects Table' in the Interim SA Report is revised to reflect our comments. For completeness, a copy of an amended 'Summary of Effects Table' that reflects Gladman's observations can be found enclosed.	Additional evidence required to determine potential change/address representation
3056	290	20	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Conclusion Gladman welcomes the publication of the Interim SA Report on strategic options for Oundle and the opportunity that has been provided to submit comments on it. It is clear from the consultation material that the Local Plan Part 2 is being informed by a sustainability appraisal and that various site options at Oundle are being assessed as part of the plan making process (noting the November 2018 Site Assessments Report).	Additional evidence required to determine potential change/address representation
3057	290	21	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Gladman supports the outcome of the Interim Sustainability Appraisal Report and indeed are of the view that the sustainability credentials of Option 1 are actually stronger than has been identified through the current scoring.	Additional evidence required to determine potential change/address representation
3058	290	22	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	I trust that our observations will be of use when preparing the Full SA Report that will accompany the version of the Local Plan Part 2 that the Council publishes under Regulation 19 in due course.	Additional evidence required to determine potential change/address representation
3059	290	23	Gladman Developments Ltd	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Please do not hesitate to contact me or my colleague XX NAME REDACTED XX should you require any further information from Gladman with regard to Land East of Cotterstock Road. I would appreciate it if you could keep me informed of future progress regarding the emerging Local Plan Part 2.	Additional evidence required to determine potential change/address representation
3094	295	1	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	We wish to make the following comments on this Interim SA Report. These comments should be read in conjunction with our comments on the Draft Local Plan which were submitted on 13 December 2018 and which, for completeness and ease of reference, are reproduced in italics at the end of these comments.	Additional evidence required to determine potential change/address representation
3095	295	2	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	General It is disappointing that the Interim SA does not address how the proposed developments (both options) should contribute towards solving the infrastructure needs i.e. car parking, health facilities, school places etc. that the developments will generate. These are major issues and for any SA report to have credibility it should address these important and pressing issues. We therefore suggest that the scope of the SA report is extended to include them.	Additional evidence required to determine potential change/address representation

3096	295	3	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Specific Page 2 1.2.2 and 1.2.3 We are delighted to note that ENC recognises that only 173 additional houses are required. This is in line with our observations made in December (Comment 3) and we assume that the Local Plan will now be amended to reflect this. That being the case we are puzzled as to why the SA continues to consider sites for 300 dwellings. Please amend your plans to avoid an over provision of housing.	Additional evidence required to determine potential change/address representation
3097	295	4	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 5 3.2.1 This section fails to deal with the limitations imposed by the narrow stone bridge on the Stoke Doyle Road and needs amending appropriately. The 700m mentioned as the distance from the site to a bus route does not seem correct. In many ways it is the least connected site to the town.	Additional evidence required to determine potential change/address representation
3098	295	5	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 5 3.2.3 A new roundabout access to the A605 would mitigate effects completely and generally improve traffic flow in the town. Why hasn't this been considered?	Additional evidence required to determine potential change/address representation
3099	295	6	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 7 3.2.15 We can't see why this option gets moderate negative effects while Option 1 gets minor. The negative effects of both options would seem broadly similar.	Additional evidence required to determine potential change/address representation
3100	295	7	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 9 3.3.15 Insufficient weight seems to have been given to the local preference for small scale distributed development. Taking this into account the positive effects of Options 1 and 2 would seem to be very similar.	Additional evidence required to determine potential change/address representation
3101	295	8	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 10 3.4.4 This site is not well connected to the town centre. In many ways it is the least well connected. The loss of open space is NOT considered a minor issue locally.	Additional evidence required to determine potential change/address representation
3102	295	9	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 14 3.7.3 The biodiversity importance of this site has been significantly understated. The water course and associated vegetation provide a valuable wildlife corridor for animals moving from the Nene Valley and Barnwell Park to the lakes at the Golf Club and onwards. Regular visitors are deer, owls, heron and kingfishers. The stream area also provides a feeding ground for bats that collect insects in the evenings, a lovely sight!	Additional evidence required to determine potential change/address representation
3103	295	10	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 16 3.8.1 The statement that this site is bounded on three sides by urban areas is a gross exaggeration and creates a misleading impression. It is intact bounded on two sides by low density residential housing and partially bounded on another side by the cemetery. Please correct this.	Additional evidence required to determine potential change/address representation
3104	295	11		1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Also due to the topography of the site any additional housing will NOT be screened by the existing houses. In fact due to the rise in the land away from the Lyveden Brook any additional housing is likely to be particularly intrusive. Please correct the present incorrect observations in the SA report.	Additional evidence required to determine potential change/address representation
3105	295	12	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 22 3.12.4 The statement that there are no areas of surface water flooding on this site is factually incorrect. The site floods extensively along the Lyveden Brook, Please refer to comment 5 in our submission of 13 December 2018. Please correct this very important inaccuracy.	Additional evidence required to determine potential change/address representation
3106	295	13	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Please note that numerous witnesses can verify the flooding. In addition no mention is made of the flow restriction caused by the low stone bridge which takes the the Stoke Doyle Road over the stream. It will be critical that any increased runoff from this site is addressed to avoid exacerbating existing flooding problems. The SA report needs to look at this whole issue again in more depth.	Additional evidence required to determine potential change/address representation
3107	295	14	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Page 25 3.13.17 The negative effects of Options 1 and 2 would seem to be broadly similar. We can't see why Option 1 would be given a less negative rating. We think that a more substantive argument is needed if this is to be justified. We trust our comments will be taken into consideration and the Interim SA amended accordingly.	Additional evidence required to determine potential change/address representation

3108	296	1	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Re proposed development of site 225 , LPP2 SA225 land behind St Peters and Cotterstock Road We are against your proposed plan to develop the field site 225 on the edge of the Oundle town boundary into a housing estate.	Additional evidence required to determine potential change/address representation
3109	296	2	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The Oundle town Plan was developed by intensive work and input from the local residents in Oundle and stated that the town of Oundle rejects the development of site 225 as there are other ways of meeting our obligation to provide an extra 172 units of accommodation which are in keeping with the town. Please will you review and reconsider the views of the Oundle residents and the housing solutions suggested.	Additional evidence required to determine potential change/address representation
3110	296	3	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The visual impact of the proposed development from the A605, from the surrounding roads and from the river would ruin the peaceful and rural feel of the Nene river running through the fields.	Additional evidence required to determine potential change/address representation
3111	296	4	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	There is already a strong odour of sewerage from the existing sewerage plant which is very noticeable when the wind is coming from that direction. This will become worse for all concerned if there are new dwellings.	Additional evidence required to determine potential change/address representation
3112	296	5	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The site is on a slope and the field is a natural soakaway for water running down from the higher areas. If this is built on there will be an increased flood risk and this will affect existing and new houses.	Additional evidence required to determine potential change/address representation
3113	296	6	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	It is an area of biodiversity and natural habitat, there are endangered birds that come annually such as cuckoos and also amphibians, insects and mammals in the field which rely on the natural habitat of an arable field.	Additional evidence required to determine potential change/address representation
3114	296	7	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The field is a site of natural springs and an environmental report has been submitted in the past to say that this is unsuitable for building.	Additional evidence required to determine potential change/address representation
3115	296	8	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The site is separated from the central amenities of Oundle and the developer is not offering any substantial benefits to the town and the local community.	Additional evidence required to determine potential change/address representation
3116	296	9	Member of the Public	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Please will you talk to Oundle town Council and review the Oundle town Plan which is what is backed by the local residents. Please do not develop site 225 as it is not in the interests of Oundle town or its residents present or future.	Additional evidence required to determine potential change/address representation
3118	297	2	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	East Northamptonshire Council (ENC) has elected to extend the Regulation 18 consultation for the Part 2 Local Plan in so far as it relates to the Oundle draft site allocations and supporting evidence in order to allow stakeholders to comment on the additional site selection work published since the close of the November/December 2018 consultation. This additional work comprises AECOM's Oundle Strategic Options Assessment (December 2018) and the Oundle Site Assessments (December 2018) by ENC.	Additional evidence required to determine potential change/address representation
3119	297	3	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The purpose of the Oundle Strategic Options Assessment report was to test the District Council's preferred strategy (Option 1) in respect of Oundle against reasonable alternatives. Only one reasonable alternative (Option 2) has been identified; namely the distribution of growth set out in the emerging Oundle Neighbourhood Development Plan (the NDP).	Additional evidence required to determine potential change/address representation
3120	297	4	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The NDP's strategy would see the allocation of seven separate sites at Oundle compared to the three sites put forward for allocation in the emerging Part 2 Local Plan. Both strategies would deliver the same scale of growth – circa 300 dwellings. This figure represents the residual housing requirement for Oundle identified in the North Northamptonshire Joint Core Strategy (2016) (NNJCS).	Additional evidence required to determine potential change/address representation

3121	297	5	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The Oundle Strategic Options Assessment concludes its appraisal of the two options at paragraph 3.18.1 of the report by stating that "The two strategic options perform relatively the same across a range of sustainability topics." However, it is plain from the report's own appraisal that Option 1 performs considerably better than Option 2 across a range of criteria and cumulatively would result in a more sustainable strategy.	Additional evidence required to determine potential change/address representation
3122	297	6	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Across the Accessibility, Landscape, and Soil Land categories Option 2 is predicted to generate "moderate negative effects." These are not offset by positive effects in other categories. No "moderate" or "significant" negative effects would result from Option 1 in any category. As a result, the approach in Draft Part 2 Local Plan is supported by the results of the Oundle Strategic Options Assessment given that the only reasonable alternative identified performs poorly in comparison to the Council's preferred strategy.	Additional evidence required to determine potential change/address representation
3123	297	7	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The above notwithstanding, the assessment of effects across the different sustainability appraisal categories in the Strategic Options Assessment could benefit from better alignment with ENC's individual site assessments. Having regard to the content of the Oundle Site Assessments report by ENC the negative effects arising from Option 2 have been understated in the Strategic Options Assessment Report across several categories.	Additional evidence required to determine potential change/address representation
3124	297	8	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Whilst it is acknowledged that there is a degree of overlap between the two options, the major difference between Option 1 and 2 is the allocation of Land North of Benefield Road for 120 dwellings. The negative effects of developing this site would be such that its inclusion in Option 2 makes this alternative strategy untenable.	Additional evidence required to determine potential change/address representation
3125	297	9	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	In summary, the Oundle Site Assessments report considers that development of Land North of Benefield Road would be associated with adverse landscape, townscape, and heritage impacts. In our view these impacts would be significantly adverse and this should be recognised as such in the Strategic Options Report.	Additional evidence required to determine potential change/address representation
3126	297	10	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	In addition, Persimmon agree with East Northamptonshire Council's position expressed in its Regulation 14 response to the Oundle NDP that Option 2 suffers from a number of deficiencies which would make it very challenging to defend at examination.	Additional evidence required to determine potential change/address representation
3127	297	11	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Again, we consider that these deficiencies could be better drawn out in the Strategic Options Assessment report as they would ultimately result in a less sustainable pattern of development compared to Option 1. We elaborate on this view under the headings below.	Additional evidence required to determine potential change/address representation
3128	297	12	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Landscape Option 2 would allocate Land North of Benefield Road for 120 dwellings. The site does not abut the built edge of the town and is adjoined by open countryside on three sides and a mix of open countryside and protected open space on the fourth.	Additional evidence required to determine potential change/address representation
3129	297	13	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The site also hosts a heritage asset which adds to both its historic and landscape significance. It is very exposed in views from Benefield Road and lacks any significant degree of inter-visibility with existing built development. Development of the site would clearly result in significant harm to a landscape of objective quality and to the landscape setting of Oundle.	Additional evidence required to determine potential change/address representation
3130	297	14	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	This view is reflected in the Oundle Site Assessments report yet the Strategic Options Assessment understates the impact of bringing forward this site and the detrimental effects it would have.	Additional evidence required to determine potential change/address representation
3131	297	15	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Housing Delivery The Strategic Options Assessment report identifies Option 2 as resulting in "minor positive effects" in the area of housing delivery. However, it is acknowledged in that report that Option 2 would put the delivery of the strategy in the NNICS at risk as "A proportion of development is proposed on sites that are not being promoted in their current form."	Additional evidence required to determine potential change/address representation
3132	297	16	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	This uncertainty is compounded by the inclusion of Land North of Benefield Road given that ENC's site appraisal cites lack of clarity on the level of technical work undertaken on this site to date, which puts its deliverability in question particularly given the heritage constraints.	Additional evidence required to determine potential change/address representation

3133	297	17	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Indeed, the NDP itself seems uncertain as to the deliverability of some of its proposed allocations given that it allocates half of Land at St Christopher's Drive as a "reserve site" to be brought forward post-2031 or if other allocations fail to deliver. This approach has been duplicated on four other sites identified in the draft NDP. St Christopher's Drive, however, can be brought forward for the full 100 dwellings within the next five years without generating any adverse impacts. What ENC has described as the proposed "artificial phasing" of the site is therefore unnecessary.	Additional evidence required to determine potential change/address representation
3134	297	18	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	The dispersed approach to distributing growth exemplified by Option 2 would also result in fewer affordable homes, especially in light of the emphasis on delivering "executive homes" in the NDP. In particular, the NDP approach describes Land North of Benefield Road as a site where it envisages bringing forward executive homes in a low density format.	Additional evidence required to determine potential change/address representation
3135	297	19	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	It is questionable the extent to which 40% affordable housing could be viably incorporated in the development via on-site provision if such an approach was taken. As a result the effects of Option 2 in the housing category should be described as purely being "uncertain."	Additional evidence required to determine potential change/address representation
3136	297	20	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Efficient Use of Land The soil and land category of the Oundle Strategic Options Assessment report describes both options as having "only minor negative effects," although the headline summary and the "Summary of Effects" at paragraph 3.18 denotes Option 2 as resulting in "moderate negative effects." It is acknowledged elsewhere in the report at paragraph 3.3.18 that Option 2 does not "appear to make for the most efficient use of land as required by the NPPF..."	Additional evidence required to determine potential change/address representation
3137	297	21	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	This is a criticism repeated in ENC's response to the Oundle NDP Regulation 14 consultation. It is therefore unclear how both options could perform the same in this regard when it is acknowledged that Option 2 would result in development coming forward at an inefficiently low density in some locations.	Additional evidence required to determine potential change/address representation
3138	297	22	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	There is a lack of evidence in how Option 2 has calculated density in the overall numbers expressed per site. This exacerbates the uncertainty around achieving appropriate contributions towards infrastructure, including affordable housing, as large executive homes which typify such low density schemes do not generally yield higher sales values per square foot. Given that large executive homes typically appeal to a smaller income bracket they are generally slower to sell which can influence build rates and thereby adversely affect the District's rolling supply of housing land, which can result in unplanned development coming forward.	Additional evidence required to determine potential change/address representation
3139	297	23	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Community Value/Health and Liveability Across these categories Option 2 is generally associated with more positive impacts than Option 1. However, it is difficult to follow how Option 1 would result in neutral "community value" impact, for example, given that paragraph 3.6.3 acknowledges that relatively large scale sites could involve greater contributions towards open space etc. than the more piecemeal approach envisaged by Option 2.	Additional evidence required to determine potential change/address representation
3140	297	24	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	As a result we consider that the performance of the two options should be scored as follows using the same methodology as AECOM's Strategic Options Assessment.	Additional evidence required to determine potential change/address representation
3144	297	28	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Conclusion Overall Persimmon considers Option 1 (the preferred option) to be the most sustainable approach to site allocations in Oundle and that this is reflected in the evidence gathered to date, including the Oundle Site Assessments report.	Additional evidence required to determine potential change/address representation
3145	297	29	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	However, the Strategic Options Assessment could benefit from better alignment with other parts of the evidence base in relation to the impacts of Option 2 across a number of SA criteria.	Additional evidence required to determine potential change/address representation

3146	297	30	Persimmon Homes	1. Introduction	Oundle	para 1.25 - 1.26	Sustainability Appraisal	Overall, both reports highlight the merits and deliverability of Land at St Christopher's Drive for around 100 dwellings which can make a significant contribution to meeting the residual housing requirement in the NNJCS with no material adverse impacts. We therefore continue to support ENC's approach in relation to site allocations at Oundle.	Additional evidence required to determine potential change/address representation
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