

# **Chapter 10**

## **Monitoring and Implementation**

Rep No	User No	User Rep No	Contact Name/ Organisation Name	Section/ chapter heading	Area	Policy/ paragraph reference	Theme/ topic	Representation received	Response to be considered
21	7	6	Glaphorn Parish Council	10. Monitoring and Implementation	Oundle	Section 10.0	Monitoring and Implementation Framework	The Local Plan does not adequately address the infrastructure implications especially for rural areas where most developments fall below the threshold of 10 units or more which often trigger developer contributions. Rural areas and villages have infrastructure needs arising from both development within the rural areas and from traffic arising from major developments in urban centres but have no access to resources to address these needs. The Local Plan should not ignore this. This is an appropriate opportunity for ENC to reconsider introducing the Community Infrastructure Levy. This would release modest resources to those rural parishes taking positive action to help meet the housing need and demand and to re-assure residents that the infrastructure consequences are not being ignored.	<b>Additional evidence required to determine potential change/address representation.</b> However, Policy 10 of the Joint Core Strategy deals with the provision of infrastructure. Thresholds for developer contributions are a matter for the Developer contributions SPD review. Whether or not the Council introduces a Community Infrastructure Levy is a separate matter to the progression of the Local Plan.
99	23	7	Apethorpe Parish Meeting	10. Monitoring and Implementation	Rural	Section 10.0	Monitoring and Implementation Framework	In common with many of the villages in East Northamptonshire, Apethorpe residents must rely on private transport. The cut back of the Call Connect service has worsened this situation. On street parking has increased substantially and there are no car parking facilities. The nearest shops are in Kings Cliffe which has two, general store, shops, these are viewed as a source of 'emergency and convenience' shopping rather than a shopping destination. However, once a villager has to drive to a shop the question is – where is most convenient. Stamford and Peterborough are able to provide comprehensive facilities. Unfortunately, Oundle, the closest town has limited facilities and often loses custom, the Thursday street market has also dwindled in recent years.	<b>No further changes required.</b> This representation seeks better accessibility to facilities for residents of Apethorpe and a large range of shops/services in Oundle town centre. Criterion c) of Policy 8 and Policy 15 of the Joint Core Strategy seek to ensure people can move easily within and between settlements by non-car modes. Policy EN20 of the draft Local Plan seeks to achieve vibrant and viable town centres.
100	23	8	Apethorpe Parish Meeting	10. Monitoring and Implementation	Rural	Section 10.0	Monitoring and Implementation Framework	Oundle is a town of great charm and architectural interest but has limited facilities. A lovely place to visit but not much to do on arrival. A vibrant marina and the opening up of the meadows adjacent to the river for public and recreational use would do much to enhance the town. This could be further boosted by leisure facilities for the residents of the town and surrounding area rather than dependence on those with limited access as they are owned by the school.	<b>No further changes required.</b> This representation seeks to improve leisure facilities in Oundle. Table 24 of this Plan recognises the area including Oundle marina as a significant tourism and leisure hub. The detail of how this is developed is a matter that is more for the Oundle Neighbourhood Plan to address.
101	23	9	Apethorpe Parish Meeting	10. Monitoring and Implementation	Rural	Section 10.0	Monitoring and Implementation Framework	The medical centre has closed its doors to new arrivals living in many of the surrounding villages. This increases private car dependence and restricts follow-on shopping.	<b>No further changes required.</b> This representation essentially seeks Oundle medical centre to take in new patients in the surrounding villages. New development can seek developer contributions towards healthcare facilities which may assist with this situation. However, generally, this is a matter for the NHS to address rather than the Local Plan.

612	100	1	Member of the public	10. Monitoring and Implementation	Oundle	Table 27.	Performance metrics	Table 27. Given the comments above the performance metrics used for Oundle (EN 24-27) should be changed. Perhaps the objective should be to secure a flow of housing completions that meet the full requirements in Oundle of 645 houses in 2011-2031, with an objective linked to the level of construction underway and targets linked to the volume of permissions that include the contributions to public benefits granted.	<b>No further changes required.</b> 345 of the 645 dwellings referred to in the representation are already accounted for in existing completions and permissions in Oundle. The 300 dwellings referred to as the performance indicator to be monitored in connection with Policy EN24 is the same as the cumulative total for the three sites referred to in Policies EN25, EN26 and EN27 and is the additional number of dwellings that is required to be provided via the Local Plan to make up this balance.
823	124	8	Glaphorn Parish Council	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	ii. The Local Plan does not adequately address the infrastructure implications especially for rural areas where most developments fall below the threshold of 10 units or more which often trigger developer contributions. Rural areas and villages have infrastructure needs arising from both development within the rural areas and from traffic arising from major developments in urban centres but have no access to resources to address these needs. The Local Plan should not ignore this.	<b>Additional evidence required to determine potential change/address representation</b> However, Policy 10 of the Joint Core Strategy seeks to secure adequate infrastructure for developments and the matter of thresholds for developer contributions needs to be considered via an updated Supplementary Planning Document on this matter.
824	124	9	Glaphorn Parish Council	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	This is an appropriate opportunity for ENC to reconsider introducing the Community Infrastructure Levy. This would release modest resources to those rural parishes taking positive action to help meet the housing need and demand and to re-assure residents that the infrastructure consequences are not being ignored.	<b>No further changes required.</b> Whether or not the Council introduces a Community Infrastructure Levy is a separate matter to the progression of the Local Plan.
1225	191	8	Corby Borough Council	10. Monitoring and Implementation	District-wide	Table 27.	Monitoring and Implementation Framework	The Monitoring and Implementation Framework is generally supported. However, there may be value in revisiting a number of the targets in Table 27 as many appear to be contextual or qualitative and instead replace these with more readily measurable quantitative targets e.g. the target for EN32 'Delivery of self and custom build' target is 'meeting the housing needs of the wider community' which although laudable could be widely interpreted and therefore difficult to measure the success or otherwise of this policy in practice.	<b>Proposed changes to text and/or Policies</b> Need to review targets to see if any can be made more quantitative.
1247	192	20	Historic England	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Evidence Base The location of the evidence base for the draft Plan is unclear.	<b>Proposed changes to text and/or Policies</b> More work is underway on the evidence base, for example, assessment of the Oundle housing sites currently being undertaken by DLP. Clarity will be added.
1248	192	21	Historic England	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	The evidence base is critical to the preparation of a Local Plan in accordance with the NPPF. Particularly relevant to site and allocations and designations could include the following:- <ul style="list-style-type: none"> <li>• Updating conservation area appraisals</li> <li>• Undertaking characterisation studies</li> <li>• Producing setting studies – of specific settlements, or specific heritage assets</li> <li>• Local lists</li> <li>• Assessments of landscape sensitivity</li> </ul> If these have been carried out, it would be helpful to make their location clearer.	<b>Proposed changes to text and/or Policies</b> More work is underway on the evidence base, for example, assessment of the Oundle housing sites currently being undertaken by DLP.

1249	192	22	Historic England	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Conservation Area Appraisals should also be included, together with any Landscape studies.	<b>Proposed changes to text and/or Policies</b> More work is underway on the evidence base, for example, assessment of the Oundle housing sites currently being undertaken by DLP.
1389	208	11	Environment Agency	10. Monitoring and Implementation	District-wide	Section 10.0	Infrastructure	We look forward to maintaining a working partnership with your Authority and other stakeholders to secure the provision of infrastructure within our remit and to ensure that the Part 2 Local Plan for East Northamptonshire District achieves sustainable development.	<b>No further changes required.</b> This comment is in support of the Plan.
1810	233	2	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .76	Area Portrait	Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient schools, including sixth form places, and have a key role in securing contributions from development to new education infrastructure.	<b>No further changes required.</b> This is a statement of fact.
1811	233	3	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .76	Area Portrait	In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We do this through a variety of means, including by supporting the adoption of sound local plan policies, site allocations and guidance (all based on robust evidence) that facilitate the delivery of education infrastructure where and when it is needed and maximise developer contributions for schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.	<b>No further changes required.</b> This is a statement of intent.
1812	233	4	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .78	Area Portrait	National policy context regarding education infrastructure In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document.	<b>No further changes required.</b> Reference is made to the need to have regard to national policies in paragraph 1.1 of the draft Local Plan
1813	233	5	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .79	Area Portrait	In particular: - The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94 of the revised NPPF).	<b>No further changes required.</b> Reference is made to the need to have regard to national policies in paragraph 1.1 of the Plan
1814	233	6	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .80	Area Portrait	The DfE supports the principle of safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.	<b>No further changes required.</b> This is a matter of detail to be considered when new schools are being proposed.
1815	233	7	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .81	Area Portrait	East Northamptonshire Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.	<b>No further changes required.</b> This is a statement of fact.
1816	233	8	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .82	Area Portrait	In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27)2, the DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.	<b>No further changes required.</b> This advises of the need for Local Authorities to work closely with the DfE over the provision of school infrastructure. This already occurs.
1817	233	9	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .83	Area Portrait	The DfE notes that the draft plan seeks to provide additional strategic and spatial policy direction for the district, over and above the overarching spatial policy framework set out in the North Northamptonshire Joint Core Strategy (NNJCS).	<b>No further changes required.</b> This is a statement of fact.
1818	233	10	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .84	Area Portrait	The JCS specified a housing requirement of 8,400 dwellings for East Northamptonshire over the plan period (2011-2031). The local plan indicates that housing delivery is progressing relatively well. It allocates some small local sites to help to meet the outstanding need, particularly in Oundle (outstanding requirement of 300 homes).	<b>No further changes required.</b> This is a statement of fact.

1819	233	11	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .85	Area Portrait	The Local Plan should be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements and 'justified' based on proportionate evidence. It is not clear from the plan if the implications of the additional housing site allocations on education infrastructure have been assessed, over and above the impacts of the strategic allocations in the NNJCS.	<b>No further changes required.</b> This comment is noted. There is regular liaison between the Planning and Education Authorities with the aim of ensuring there are sufficient school places to meet the increase in demand generated by new developments.
1820	233	12	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .86	Area Portrait	The DfE recommends that the next iteration of the plan includes evidence on education capacity and need, to ensure that any requirements for developer contributions towards education infrastructure (school expansions or new schools), secured in accordance with policy 10 of the NNJCS, and any related site allocations, can be made clear to developers and other stakeholders and factored into the local plan viability assessment.	<b>No further changes required.</b> Work on the viability assessment of the Local Plan will take account of the need for education provision.
1821	233	13	Department for Education	10. Monitoring and Implementation	<b>Rushden</b>	para 2.45/ Figure .87	Area Portrait	Site allocation for Friars East Academy The draft plan identifies Rushden as the growth town for the area that will provide the majority of new housing (target is 3,285 homes) during the plan period. Policy 33 of the NNJCS identifies Rushden East Sustainable Urban Extension (SUE) as the location for around 2,500 dwellings, employment opportunities and supporting infrastructure, including a requirement for two new primary schools and land reserved for a new secondary school.	<b>No further changes required.</b> This is a matter for the ongoing discussions on the Rushden East Masterplan.
1822	233	14	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .88	Area Portrait	In this context the DfE would like to propose a site allocation for a free school pipeline project. Friars East Academy is a proposed new free school for students aged 11-18 with a Statement of Special Educational Needs or an Education, Health and Care Plan for moderate learning difficulties to severe learning difficulties, including students with autism. It would have a full capacity of 145 pupils.	<b>No further changes required.</b> This is a matter for the ongoing discussions on the Rushden East Masterplan.
1823	233	15	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .89	Area Portrait	Friars Academy in Wellingborough (an Ofsted Outstanding academy) is oversubscribed and its site does not allow for further expansion. Northamptonshire County Council has encouraged Friars Academy to apply to open another Special Educational Needs (SEN) school in the Rushden area to meet the overwhelming demand for additional SEN places. This new school would be a satellite of the main operation in Wellingborough. Northamptonshire County Council is committed to the establishment of the school and has confirmed that it will commission and fund all places at the proposed new school.	<b>No further changes required.</b> This is a matter for the ongoing discussions on the Rushden East Masterplan.
1825	233	17	Department for Education	10. Monitoring and Implementation	Higham Ferrers	para 2.45/ Figure .91	Area Portrait	However, it does form part of the Duchy of Lancaster's estate, for which a sports-led masterplan is currently being developed and discussed with East Northamptonshire Council (see draft Sporting Masterplan 'close-up', which indicates the school site in relation to Moulton College and Higham Town FC sites, and the emerging proposals for the Northamptonshire FA site, attached to this letter).	<b>No further changes required.</b> This is a matter for the ongoing discussions on the Rushden East Masterplan.
1826	233	18	Department for Education	10. Monitoring and Implementation	Higham Ferrers	para 2.45/ Figure .92	Area Portrait	To provide certainty around delivery of the school, we request that the identified site be formally allocated for D1 use to accommodate the proposed school. It is critical that discussions take place as quickly as possible to agree an available and suitable site which can be delivered to meet the proposed school opening timetable (preferred opening date of September 2020) and taking account of site acquisition, planning and construction programme requirements.	<b>No further changes required.</b> This is a matter for the ongoing discussions on the Rushden East Masterplan.
1827	233	19	Department for Education	10. Monitoring and Implementation	Higham Ferrers	para 2.45/ Figure .93	Area Portrait	The DfE proposes continued discussion with East Northamptonshire Council, Northamptonshire County Council, Duchy of Lancaster, Sport England and other key stakeholders as part of the emerging planning strategy for the school's proposals for the site and the joint masterplanning of the wider area.	<b>No further changes required.</b> This is a matter for the ongoing discussions on the Rushden East Masterplan and discussions about the wider area will take place as other development proposals emerge.

1828	233	20	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .94	Area Portrait	Developer Contributions One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.	<b>No further changes required.</b> This comment is noted. There is regular liaison between the Planning and Education Authorities with the aim of ensuring there are sufficient school places to meet the increase in demand generated by new developments.
1829	233	21	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .95	Area Portrait	The DfE notes that East Northamptonshire Council has produced a Developer Contributions SPD, but this dates from 2006. A North Northamptonshire Developer Contributions SPD was consulted on in 2010 but does not appear to have been adopted.	<b>No further changes required.</b> There is recognition of the need to progress an up to date developer contributions SPD.
1830	233	22	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .96	Area Portrait	The DfE recommends that the next version of the Local Plan Part 2 include a commitment to revise the Developer Contributions SPD in line with the latest evidence of the district's infrastructure needs, pupil yields and build costs (including the cost of school expansion, new build and SEN provision) and the vision and objectives of the new Local Plan.	<b>No further changes required.</b> There is recognition of the need to progress an up to date developer contributions SPD.
1831	233	23	Department for Education	10. Monitoring and Implementation	District-wide	para 2.45/ Figure .97	Area Portrait	Any such review should be prepared in consultation with the county council as local education authority, and align closely with the county council's 'Creating Sustainable Communities: Planning Obligations Framework and Guidance' document January 2015 (or any update). This will help to ensure appropriate rates are levied and the right infrastructure is secured across the district. The DfE supports the Council's approach to ensure developer contributions address the impacts arising from growth.	<b>No further changes required.</b> It is accepted that work on an up to date developer contributions SPD will involve consulting with the Education Authority.
1855	234	22	Gladman Developments Ltd	10. Monitoring and Implementation	District-wide	Section 10.0	Area Portrait	The inclusion of a robust monitoring framework will ensure that evidence is kept up-to-date and that the review process will lead to policies of the plan being formally updated whenever necessary to ensure that they remain relevant and 'up-to-date' over time.	<b>No further changes required.</b> This comment is in support of the Plan.
2160	242	3	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	In addition, the County Council's 'Creating Sustainable Communities: Planning Obligations Framework and Guidance – January 2015' document sets out the adopted policy approach of the County Council to requesting and securing Section 106 obligations in respect of Education, Libraries, Fire and Rescue and Superfast Broadband infrastructure (amongst other areas).	<b>No further changes required.</b> This is just a statement of fact.
2161	242	4	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	The County Council recommends that all development proposed in the Draft Plan be underpinned by the policy set out in this document (and future iterations) to ensure that sufficient capacity can be provided across East Northamptonshire to meet the needs of planned for growth.	<b>No further changes required.</b> Policy 10 of the Joint Core Strategy seeks to ensure adequate infrastructure is provided to serve any new development.
2165	242	8	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Education Infrastructure and Facilities As the Local Education Authority for the county of Northamptonshire, the County Council has a statutory responsibility for ensuring the sufficiency of provision for all pupils of school age across Early Years, Primary, Secondary and Sixth-form Education.	<b>No further changes required.</b> Policy 10 of the Joint Core Strategy seeks to ensure adequate infrastructure, including schools, is provided to serve any new development.
2166	242		Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	It is the County Council's role to plan, commission and organise school places in a way that promotes the raising of standards, manages supply and demand, and creates a diverse infrastructure. The County Council's 'School Organisation Plan 2016-2021 – Local Places for Local Children' (SOP) provides the framework for meeting these objectives, providing accommodation for school places that is high quality, fit for purpose, provides value for money and ensures flexibility to respond to changes in need.	<b>No further changes required.</b> Policy 10 of the Joint Core Strategy seeks to ensure adequate infrastructure, including schools, is provided to serve any new development.
2167	242	10	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	The SOP is currently being updated for the period 2018-2023, and its updated evidence base and strategic priorities, should at all stages inform the strategic direction for provision of Education Infrastructure across the county.	<b>No further changes required.</b> Policy 10 of the Joint Core Strategy seeks to ensure adequate infrastructure, including schools, is provided to serve any new development.

2168	242	11	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	In addition, 'Planning for Schools Development (2011)' a Joint policy document prepared by the Secretary of State for Education and Secretary of State for Communities and Local Government, sets out the Government's commitments to planning and delivery of state-funded schools and should also be taken into account in supporting the implementation of the policies in the Draft Plan.	<b>No further changes required.</b> Policy 10 of the Joint Core Strategy seeks to ensure adequate infrastructure, including schools, is provided to serve any new development.
2169	242	12	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	New housing development creates additional demand for existing and new education provision. Across Northamptonshire 80,000 additional new homes are expected to be built by 2031. These are likely to lead to approximately 24,000 additional Primary aged pupils and 16,000 Secondary and Sixth Form pupils.	<b>No further changes required.</b> Policy 10 of the Joint Core Strategy seeks to ensure adequate infrastructure, including schools, is provided to serve any new development.
2170	242	13	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Since 2010, the County Council has invested £230m in the schools estate in Northamptonshire; its Capital Strategy 2018-23 identifies a further £360m of investment that is required to meet the anticipated demand for school places in the county and ensure that the County Council continues to meet its statutory obligations.	<b>No further changes required.</b> This is just a statement of fact.
2173	242	16	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	The Draft is underpinned by the North Northamptonshire Infrastructure Delivery Plan, which identifies the strategic infrastructure requirements necessary to support planned growth. It will be necessary to review this regularly with partners to ensure that the most up to date information is available to inform development, and to take into account any changes to proposed implementation schedules, which may result in bringing forward or pushing back delivery of key schemes to meet demand.	<b>No further changes required.</b> This representation advises of the need to regularly review the North Northamptonshire Infrastructure Delivery Plan. This is accepted but is a separate document to the draft Local Plan. Implications of local infrastructure requirements will be reviewed as part of this Part 2 Plan
2174	242	17	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	This may be particularly relevant when considering Education and Libraries infrastructure, where a mixture of localised and strategic infrastructure projects may be required to support growth. As such, it is the opinion of the County Council that all major housing development (schemes of over 10 units) should be assessed on the basis of its impact on local Education and Libraries infrastructure, and obligations may be secured towards mitigating this where additional capacity is deemed to be required.	<b>No further changes required.</b> The County Council is regularly asked if they wish to secure education or libraries contributions for major housing schemes. In addition, the thresholds for developer contributions are a matter for the Council's Developer contributions SPD when this is reviewed. However, implications of local infrastructure requirements will be reviewed as part of this Part 2 Plan
2175	242	18	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	The Draft should clearly stipulate this requirement in relation to housing delivery, and should therefore be amended to reflect this requirement.	<b>No further changes required.</b> The thresholds for securing developer contributions are a matter for the Council's Developer contributions SPD when this is reviewed.
2176	242	19	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	In addition, it should be recognised that small sites (10 units or less) may still have a cumulative impact on existing provision and capacity when considered in conjunction with other development in a locality, and whilst s106 developer contributions would normally be secured from these schemes there should be a recognition that their impact may still need to be mitigated and provision made through Section 106 agreements.	<b>No further changes required.</b> The circumstances for securing developer contributions are a matter for the Council's Developer contributions SPD when this is reviewed. In addition, paragraph 4.27 of the Joint Core Strategy recognises that developer contributions can be secured where they relate to the cumulative impact of developments.

2178	242	21	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	The Northamptonshire vision is for the county to be at the leading edge of the global digital economy. This requires new developments (both housing and commercial) to be directly served by high quality fibre networks. Access to a next generation network (speeds of >30mbs) will bring a multitude of opportunities, savings and benefits to the county. It also adds value to the development and attract occupiers. Maximising full-fibre coverage is clearly the goal.	<b>No further changes required.</b> Criterion e) of Policy 10 of the JCS seeks to secure next generation broadband to serve all areas including by providing on-site infrastructure to enable premises to be directly served. In addition, the provision of superfast broadband is listed as a performance indicator to be monitored in table 9 included in the JCS.
2179	242	22	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Furthermore, the County Council is keen to encourage wider adoption of the approach, as recently outlined in an October 2018 consultation document published by, of the delivery of 'full fibre' connectivity to new build development.	<b>No further changes required.</b> Criterion e) of Policy 10 of the JCS seeks to secure next generation broadband to serve all areas including by providing on-site infrastructure to enable premises to be directly served. In addition, the provision of superfast broadband is listed as a performance indicator to be monitored in table 9 included in the JCS.
2180	242	23	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Whilst it is acknowledged that this is currently at consultation stage, the County Council request that ENC consider the proposals contained within the consultation document, and advocate that the aims of this approach be reflected in future iterations of the Draft. There should also be acknowledgement of the need to improve mobile connectivity in the district including increased coverage of 4G and enabling 5G access. This will have implications in terms of development.	<b>No further changes required.</b> Criterion e) of Policy 10 of the JCS seeks to secure next generation broadband to serve all areas including by providing on-site infrastructure to enable premises to be directly served. In addition, the provision of superfast broadband is listed as a performance indicator to be monitored in table 9 included in the JCS.
2181	242	24	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	With regards to Libraries provision, it is noted that Library Infrastructure is identified (and protected) by Policy 7 of the Joint Core Strategy as an identified community facility. The Draft Plan should however be more explicit in recognising the impact of major housing development on existing provision, and, support the approach of the County Council in securing development contributions, where appropriate, to help mitigate the impact of new housing, improving capacity and the range of services delivered in line with the County Council's priorities for the Library service.	<b>No further changes required.</b> The County Council is already regularly asked if they wish to secure libraries contributions for major housing schemes. In addition, the thresholds for developer contributions are a matter for the Council's Developer contributions SPD when this is reviewed.
2182	242	25	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	New developments and associated infrastructure within East Northamptonshire equates to an increase in visitors as well as traffic movements. This will inevitably lead to an increase in the spread of fire risk, which places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance.	<b>No further changes required.</b> This is a statement of fact. In addition, fire hydrants are regularly sought in connection with major housing schemes in order to help make them safe from the point view of limiting the spread of fire risk. In addition, one of the items sought via criterion e) of Policy 8 of the JCS is fire safety measures.



2183	242	26	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Northamptonshire Fire and Rescue Service sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within its statutory responsibilities under the Fire and Rescue Services Act 2004.	<b>No further changes required.</b> This is a statement of fact.
2184	242	27	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Development coming forward during the Draft Plan period should be assessed to ensure that sufficient infrastructure is in place to accommodate the increased demand for services. This may result in a requirement for developer contributions to be secured, or for appropriate planning conditions to be applied to permissions granted, to ensure that adequate infrastructure is in place to enable fire, should it occur, to be effectively tackled.	<b>No further changes required.</b> Fire hydrants are already regularly sought in connection with major housing schemes via planning condition in order to help make them safe from the point view of enabling fires to be tackled. In addition, one of the items sought via criterion 8 of Policy 8 of the JCS is fire safety measures.
2185	242	28	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	In addition to highway improvements, provision may also be sought towards facilities enabling improved traffic and travel information in the District, sometimes as part of a travel plan, to help mitigate the impact of development. Even in areas where the car is the primary mode of travel, live information can help to promote the availability of alternative travel modes and reduce congestion by providing helpful journey information.	<b>No further changes required.</b> Travel plans are already regularly sought in connection with major planning applications and facilities enabling improved traffic and travel information are a justified Section 106 request.
2186	242	29	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	The County Council would also advocate inclusion within the Draft Plan of a policy to encourage and support the further use of electric vehicle charging points on new development sites, similar to the approach proposed in the recent South Northamptonshire Local Plan Part 2 consultation (Policy INF4). Such a policy would help to encourage modal shift away from standard modes of transport towards more sustainable methods and meet the rising demand for such provision as demonstrated through significant increase in sales of electric plug-in and low emission vehicles across the UK.	<b>Proposed changes to text and/or Policies.</b> Consideration is already being given to including a Policy reference to electric charging points following a representation in relation to Policy EN12.
2187	242	30	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Concluding comments The County Council welcomes the development of the Draft East Northamptonshire Local Plan Part 2 and remains committed to working with the Council and other partners in relation to the sustainable delivery of schools provision, including: the Education, Funding and Skills Agency, Free Schools, Academy Trusts, existing schools, education providers, developers and local communities.	<b>No further changes required.</b> This is a statement of intent of close working between the the County and Distict Councils.
2188	242	31	Northants County Council Development Management	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Continued engagement is welcomed with East Northamptonshire Council, particularly as the Draft is progressed and as the County Council's adopted Planning Obligations Framework and Guidance (2015) document is updated. This will ensure that current priorities and policies of the County Council and ENC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 to effectively mitigate the impact of development.	<b>No further changes required.</b> This is a statement of intent of close working between the the County and Distict Councils. However, implications of local infrastructure requirements will be reviewed as part of this Part 2 Plan

2245	244	41	Oundle Town Council (Clr P Peel)	10. Monitoring and Implementation	Oundle	Table 27.	Monitoring and Implementation Framework	Table 27. Given the comments above the performance metrics used for Oundle (EN 24-27) should be changed. Perhaps the objective should be to secure a flow of housing completions that meet the full requirements in Oundle of 645 houses in 2011-2031, with an objective linked to the level of construction underway and targets linked to the volume of permissions that include the contributions to public benefits granted.	<b>No further changes required.</b> 345 of the 645 dwellings referred to in the representation are accounted for in existing completions and permissions in Oundle. The 300 dwellings referred to as the performance indicator to be monitored in connection with Policy EN24 is the same as the cumulative total for the three sites referred to in Policies EN25, EN26 and EN27 and is the additional number of dwellings that is required to be provided via the Local Plan to make up this balance.
2334	247	14	The Wildlife Trust	10. Monitoring and Implementation	District-wide	Section 10.0	Glossary	For the overall content of the "Glossary" section, on Pages 144 to 146, inclusive, in this same document : Based upon the total combined content of The Wildlife Trust's own feedback and comments, as set-out here above, we are therefore of the view that there a significant number of additional terms which could still usefully and beneficially be included in this same Glossary section of the overall documentation.	<b>Proposed changes to text and/or Policies.</b> Need to give consideration to including other terms in the glossary section based on changes to be made following the Trust's representation including Local Geological Sites (LGS).
2422	254	16	North Northants Joint Planning and Delivery Unit	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	Use Monitoring Framework in PBW as Inspector specifically considered it	<b>Proposed changes to text and/or Policies.</b> Need to review targets to see if they can be improved on based on ones in the Borough of Wellingborough Local Plan.
2456	255	33	ENC Head of Economic and Commercial Development	10. Monitoring and Implementation	District-wide	Section 10.0	Monitoring and Implementation Framework	§106 – Developers contributions - will there be a separate policy? – I think this would help with local interpretation/ expectations/ management	<b>No further changes required.</b> Policy 10 of the JCS seeks to secure adequate infrastructure, services and facilities in connection with development and The circumstances for securing developer contributions are a matter for the Council's Developer contributions SPD when this is reviewed.