



Council – 18 July 2011

Planning Policy Issues Debate

Purpose of report

This report sets out potential options for planning policy development for East Northamptonshire. This is presented for Members' consideration and to seek agreement to the way forward.

Attachment(s)

- Appendix 1 Potential Options
- Appendix 2 Types of Planning Document
- Appendix 3 Neighbourhood Plans
- Appendix 4 Evidence Base for Four Towns Plan

1.0 Background

- 1.1 This report has been prepared to provide Members with potential options and background information to assist the debate into the way forward for planning policy development for East Northamptonshire.
- 1.2 The appendices are as follows:
- Appendix 1 sets out potential options.
 - Appendix 2 provides an outline of the types of planning document that exist.
 - Appendix 3 provides a brief overview of Neighbourhood Plans (it should be highlighted that, as the Localism Bill has yet to be enacted, this information may be subject to further change).
 - Appendix 4 provides brief details about the current evidence base needed for the Four Towns Plan (and progress with it).
- 1.3 In terms of the current planning policy context, the Government is progressing with the Localism Bill, which introduces the concept of Neighbourhood Plans. However, there also remains a statutory requirement for Local Authorities to continue to prepare development plans for their area (Planning and Compulsory Purchase Act 2004).

The Rt Hon Greg Clark MP, in his speech to the recent Royal Town Planning Institute Planning Convention (14 June 2011), said:

"The presumption in favour of sustainable development will mean that every local council should:

- *plan positively for new development*
- *prepare local plans on the basis that objectively assessed development needs should be met*
- *approve development proposals that accord with plans without delay; and*
- *grant permission where a plan is absent, silent or out of date".*

Furthermore, national planning policy requires the Council to clearly identify a 5 year deliverable housing land supply for the area. This is commonly an issue considered during planning appeal cases. Should plans not be progressed, the Council will be subject to more planning applications being determined by appeal, for example Barwoods, Raunds (decision expected by end July 2011). Such planning appeals may well result in costs being awarded against the Council and will ultimately result in a loss of control over where development is located.

- 1.4 The Regional Spatial Strategy is still legally in existence until the Localism Bill is enacted and there needs to be a Strategic Environmental Assessment of the proposal to abolish. The RSS therefore remains part of the current Development Plan for East Northamptonshire.
- 1.5 The Adopted North Northamptonshire Core Spatial Strategy (June 2008) is currently under review. An Issues Consultation has already taken place and the next stage will be a Preferred Options Consultation (during Autumn 2011). Officers from each Council within North Northamptonshire are working together with the Joint Planning Unit on various technical project groups, which are preparing different aspects of the Core Strategy. It is anticipated that a revised Core Strategy will be adopted by late 2012. The Core Strategy will provide an overarching strategic planning policy document for the area and Government policy (PPS12) specifies that the Core Strategy should form the principal development plan document for the District.
- 1.6 Work is progressing to put more detailed policies, and more general ones that relate to all Districts, within the Core Strategy, so that District/Borough plans can then potentially be more streamlined. Corby Borough Council has formally decided that it will cease work on Site Specific Allocations DPD to focus on the Core Strategy work before deciding what documents to progress. Meanwhile, Kettering and Wellingborough Councils have informally indicated that they plan to continue work on their Site Specific DPDs.
- 1.7 Within East Northamptonshire, the Rural North, Oundle and Thrapston Plan has already been completed for the north of the District, and was found sound by the Planning Inspectorate (8 July 2009). The Council has not adopted the Plan, which was referred to the Secretary of State for Communities and Local Government in March 2010. Nevertheless, it is treated as a material planning consideration for making planning decisions and recent appeal decisions (e.g. Benefield Road, Oundle and Mill Road/Paddock Road, Woodford) have given strong weight to the RNOTP.
- 1.8 On 29 October 2009, the Planning Policy Committee approved the preparation of a Four Towns Plan (to include the towns of Higham Ferrers, Irthlingborough, Raunds, Rushden and surrounding villages to the south of the District), merging the earlier Raunds Area and Three Towns Plans. The Committee agreed to a list of issues to be included in the Plan (14 June 2010) and approved the funding of specialists, from the existing budget, to carry out certain technical studies in respect of the Plan (20 September 2010). A draft timetable for the preparation of the Four Towns Plan was then approved by the Planning Policy Committee (22 November 2010).
- 1.9 It should also be highlighted that, should the Council decide to progress with any of the following options: just the Core Strategy; the Core Strategy + 6 separate Town Plans; Core Strategy + 1 District Plan, then the planning weight that can be given to the existing Rural North, Oundle and Thrapston Plan in decision-making and appeals will diminish; i.e. given that the Council is publicly declaring that it does not wish to adopt this Plan and instead will be replacing it with something different.
- 1.10 It should also be noted that the Government, through the Localism Bill, intends to introduce Neighbourhood Plans. A neighbourhood (e.g. Parish Council) can decide to come forward to prepare such a plan and, subject to meeting certain criteria, the Local Authority will have to accept it into the planning framework for the area. In effect, therefore, they can potentially be undertaken by a neighbourhood to accompany any of the options within this report.
- 1.11 For information, a number of areas have recently been given "vanguard status" by the Government to test how to prepare these Neighbourhood Plans. Two bids were submitted by this Council, one for Raunds and the other for Oundle. Neither of these was successful, but the Government has allocated £20,000 to the Council in respect of each bid. Consideration will need to be given as to how to use this funding to take forward neighbourhood planning. It should be noted that Neighbourhood Plans would sit within the current planning framework under the North Northamptonshire Core Strategy and any

Development Plan Documents for the area, for example the Rural North, Oundle and Thrapston Plan or Four Towns Plan etc . However, they are **not** able to introduce new strategic planning policy or contradict policy within DPDs or any national planning policy guidance etc.

2.0 Equality and Diversity Implications

2.1 No Equalities Impact Assessment is required.

3.0 Legal Implications

3.1 There are legal implications should plans not be progressed. The Council has a statutory duty to prepare plans for the District.

4.0 Risk Management

4.1 There are significant risks should plans not be progressed, for example more planning applications will be determined by appeal, and there will ultimately be a loss of control over development.

5.0 Financial implications

5.1 It should be noted that a budget is already allocated for 2011/2012 for the Core Strategy and the current Four Towns Plan preparation work. Should a further budget be required, this would be brought back to the Planning Policy Committee, Policy and Resources Committee and Council for approval.

5.2 There are financial implications should plans not be progressed. Any lost planning appeals may be accompanied by costs being awarded against the Council for unreasonable decision making.

6.0 Corporate Outcomes

6.1 The development of plans supports priority outcomes set out in the Corporate Plan; including:

- Regeneration and Economic Development
- Sustainable Development
- Strong Communities
- High Quality Built Environment
- Improved Housing
- Good Public Health

7.0 Recommendation

7.1 The Committee is recommended to consider options for planning policy development within East Northamptonshire and agree the way forward.

(Reason –in order to provide an up-to-date planning policy framework for decision-making for the District)

Legal	Power: Planning and Compulsory Purchase Act 2004				
	Other considerations:				
Background Papers: Planning Policy Committee 29th October 2009, 14th June 2010, 20th September 2010, 22nd November 2010.					
Person Originating Report: Karen Britton – Planning Policy and Conservation Manager Extn: 2142 kbritton@east-northamptonshire.gov.uk					
Date: 5 July 2011					
CFO		MO		CX	

Appendix 1 Potential Options

The following options are listed in no particular order and are highlighted simply to assist the debate. Pros and Cons are provided first, then followed by costings and timescales.

Neighbourhood Plans are not specifically listed as an Option, as their preparation is reliant upon a “neighbourhood” deciding to prepare them (see Appendix 3 for further details) and these can be carried out with any option.

When considering the Options, Members are advised to refer also to Appendix 4, which provides a summary of the main areas of evidence-based work that are involved in preparing 1 Plan.

Note also that all options meet Corporate Priority Outcomes.

Pros	Cons
Option 1 - Core Strategy (CS) only – no local Development Plan Documents	
<p>Provides strategic level policy protection</p> <p>The revision to the Core Strategy (CS) may provide more detail than the current CS</p>	<p>The role of the CS is to provide strategic policy direction and allocate strategic sites e.g. urban extensions to growth towns. It does not provide detailed local policies or smaller scale site allocations</p> <p>National Planning Policy Statement 12 states:</p> <p>“Core strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy. Progress on the core strategy should not be held up by inclusion of non strategic sites”</p> <p>As only strategic sites are identified in CS, then much of the development in the ENC area would be reliant on the development industry to identify the non-strategic sites</p> <p>Whilst the CS provides a strategic framework, it will not cover</p>

Pros	Cons
	<p>the more local, detailed issues that need to be addressed if full control over development is to be exercised</p> <p>ENC would lose the ability to identify the five year supply of housing land, which is a Government requirement, and this could lead to dire consequences at planning appeal</p> <p>For information, the themes that a CS is not expected to cover includes, for example smaller site allocations, town centre primary shopping areas, town centre boundaries, non-statutory environmental designations, such as County Wildlife Sites, Locally Listed Buildings etc, Local Green Infrastructure, such as cycle routes, green links etc, Local Landscape Designations, such as Important Open Land, Residential Character Areas, Gypsy and Traveller Sites (where only limited numbers of pitches are needed), detailed policy or drawing up of Settlement Boundaries</p> <p>If Members approve this option i.e. to work solely on the CS and stop existing work on the FTP, the “material planning consideration” status/ planning weight currently given to the RNOTP will greatly diminish/ weaken</p>
Option 2 - Core Strategy + Four Towns Plan (FTP) + Rural North, Oundle and Thrapston Plan (RNOTP)	
<p>CS as above</p> <p>The RNOTP could be adopted at any time, as it has already been found sound and could be given an early review, subject to normal planning procedures</p> <p>Work is already ongoing on FTP (see Appendix 4 for details)</p> <p>Together, the CS, RNOTP and FTP would provide district-wide planning policy coverage</p>	<p>CS as above</p> <p>In the short term, some Members remain unhappy with some of the existing RNOTP content</p>

Pros	Cons
Option 3 - Core Strategy + 1 District Plan	
<p>CS as above</p> <p>If Members choose to switch to 1 District Plan, some evidence/survey work can be transferred and adapted from the RNOTP and FTP</p> <p>Together, the CS and 1 District Plan would provide district-wide planning policy coverage</p>	<p>CS as above</p> <p>All areas covered by a new 1 District Plan would need to be treated on “an equal footing” i.e. some surveys/ work previously carried out e.g. for RNOTP, will need updating. A refresh of existing information/evidence is anticipated to enable a new plan for the whole area to be prepared in an up-to-date manner, in order to provide a sound and equitable basis for decisions and content</p> <p>If Members approve this option, work on the FTP will stop and the “material planning consideration” status/ planning weight currently given to the RNOTP will greatly diminish/ weaken</p>
Option 4 - Core Strategy + 6 Separate Town Plans - Higham Ferrers, Irthlingborough, Oundle, Raunds, Rushden, Thrapston	
<p>CS as above</p> <p>6 Separate Town Plans provides very town-specific policy and site allocation</p>	<p>CS as above</p> <p>Timescale for preparation of 6 plans would be potentially very lengthy as you would need to focus in on preparing 6 sets of detailed evidence documentation/ related surveys etc for each town and would need 6 separate Examinations by Independent Inspectors, with associated time/cost</p> <p>What happens about policy for the remaining areas i.e. the other settlements and more rural areas? Would the 6 Town Plans also relate to their surrounding rural hinterland? Would there be sole reliance on the strategic policies of the Core Strategy or would another separate Plan need to be prepared to cover all of the other areas?</p>

Pros	Cons
	If Members approve this option, work on the FTP will stop and the “material planning consideration” status / planning weight currently given to the RNOTP will greatly diminish/ weaken

The following provides a brief indication of potential timescales and also costings, which should be read in conjunction with the costing examples provided in Appendix 3. It should be noted that when preparing plans it is difficult to predict precise costings. This may be for a number of reasons, for example research during plan preparation can highlight where areas of existing evidence are weak and therefore require further survey work; Members may wish to have detailed policy on particular issues, which may require specific studies; and planning legislation and policy can change, requiring new procedures or surveys etc to be undertaken.

Option		Cost	Timescales
1	Core Strategy (CS) only – no local Development Plan Documents	Budget already allocated for 2011/12 to prepare CS (each Local Authority within North Northamptonshire is contributing £110,000 towards the CS for this period)	CS Adoption anticipated by end 2012
2	Core Strategy + Four Towns Plan (FTP) + Rural North, Oundle and Thrapston Plan (RNOTP)	<p>Budget already allocated for 2011/12 to prepare CS</p> <p>RNOTP already found sound, but not adopted (cost of adoption process would be minimal)</p> <p>Four Towns Plan (FTP) – work already well underway and has an existing budget of £150,000 for the 2011/12 period, however further budget will be required (i.e. for next year's work and the Examination). Note: A report taken to Planning Policy Committee on 27th July 2009 estimated the total cost for the FTP as £450,000, therefore a further £300,000 may be required for 2012/13</p> <p>Appendix 3 also provides some examples of costing estimates for the preparation of Neighbourhood Plans; some of which can be applied to the preparation of other DPDs e.g. costing estimates for Strategic Environmental Assessment and Habitats Regulation</p>	<p>CS Adoption anticipated by end 2012</p> <p>RNOTP could be adopted by end 2011</p> <p>FTP Adoption anticipated by end 2013</p>

		<p>Assessment.</p> <p>Note: The following provide some other examples of required costings:</p> <p>Strategic Flood Risk Assessment: £25,000 (estimate)</p> <p>Examination: Cost just for the Planning Inspectorate for the RNOTP Examination approx. £70,000</p>	
3	Core Strategy + 1 District Plan	<p>Budget already allocated for 2011/12 to prepare CS</p> <p>1 District Plan - estimated total cost as per FTP above, plus potential additional costs for information/ survey updates at a district-wide scale – total estimated figure not known for these updates until content investigated</p>	<p>CS Adoption anticipated by end 2012</p> <p>Adoption anticipated by end 2014 at the earliest</p>
4	Core Strategy + 6 Separate Town Plans for Higham Ferrers, Irthlingborough, Oundle, Raunds, Rushden, Thrapston	<p>Budget already allocated for 2011/12 to prepare CS</p> <p>6 Separate Town Plans – estimated total cost as per FTP above x 6, however there may be some scope for economies of scale e.g. some information may be transferable for use in more than one plan, and specialist technical consultants might provide “discounts” if commissioned to carry out work on all 6 plans. However, 6 Examinations would be needed at a total cost just for the Planning Inspectorate element of £420,000 (estimate)</p>	<p>CS Adoption anticipated by end 2012</p> <p>It may be possible to prepare 2 plans per year, subject to resources. If so, indicative timescales for adoption might be 2 plans by end 2013, 2 by end 2014 and 2 by end 2015</p> <p>How would we decide the order of priority for plan preparation i.e which town has a plan first etc?</p>

Appendix 2

Types of Planning Document:

A Brief Summary Guide to Some Key Planning and Related Documents (at June 2011)

The following provides a non-definitive, brief introductory guide to just some of the different documents that currently exist. It aims to simply provide a brief overview to assist understanding. It is acknowledged that the Government intends to make further changes, which may impact upon these. Reference is also made within the "Preparation" column as to whether they are subject to Independent Examination or not.

Title of Document	Prepared/ Lead by	Content in Brief	Consultation/ Examination
Planning Policy Guidance (PPGs) / Planning Policy Statement (PPSs)	Government	Planning Policy Guidance and their replacements Planning Policy Statements set out national planning policy. They explain statutory provisions and provide guidance on planning policy and the operation of the planning system. Topics covered include e.g. Housing, Transport, Energy etc. The Government has indicated that it intends to replace all of these with one National Planning Policy Framework (draft due to be published during July).	Consultation, but no Examination
East Midlands Regional Spatial Strategy (RSS) (also known as the East Midlands Regional Plan, adopted March 2009)	East Midlands Regional Assembly (now known as "East Midlands Councils")	Sets out the strategic plan for the East Midlands. The Government has indicated it plans to abolish RSS, but the legislation to do so has yet to be enacted through the Localism Bill	Consultation and Independent Examination
Local Development Framework (LDF)	Local Authority	The LDF is the overarching name given to the system of Development Plans introduced by the Planning and Compulsory Purchase Act 2004. The LDF comprises of a collection of inter-related planning documents	Consultation and some of the Documents require Independent Examination
Local Development Scheme (LDS)	Local Authority	The LDS is the timetable/project plan for document preparation	Approved by Planning Policy Committee and

			submitted to JPU for incorporation into North Northamptonshire Joint LDS, which since the abolition of GOEM, is now to be submitted direct to DCLG
Development Plan Documents (DPDs)	Local Authority	“Development Plan Documents” (DPDs) is the generic term for most documents that make up the LDF. In the case of East Northamptonshire, this includes the Core Strategy and Site-Specific Allocations DPDs e.g. Rural North, Oundle and Thrapston Plan and Four Towns Plan etc	Consultation and Independent Examination
Core Spatial Strategy (CSS) <i>often just called Core Strategy (CS)</i> e.g. North Northamptonshire Core Spatial Strategy	Local Authority (s)	The CSS currently sits below the Regional Spatial Strategy and provides a more local level strategic plan e.g. North Northamptonshire CSS. It has to be prepared to take on board both national and regional policy and guidance. The North Northamptonshire CSS (adopted June 2008) is currently the principal Development Plan Document (DPD) for East Northamptonshire.	Consultation and Independent Examination
Local Plan	Local Authority	Sets out the planning policies for a more local area e.g. East Northamptonshire Local Plan. Local Plans are being gradually superseded by the Core Strategy or other DPDs (see below). However, policies in Local Plans can also be “saved” and used alongside other DPDs. Note: The current Government refers to plans generally as “Local Plans”, which can be confusing	Consultation and Independent Examination
Supplementary Planning Documents (SPDs)	Local Authority The LA can also work with/ or	Supplementary Planning Documents (SPDs) provide detailed guidance, which supplements a policy	Consultation, but No Examination

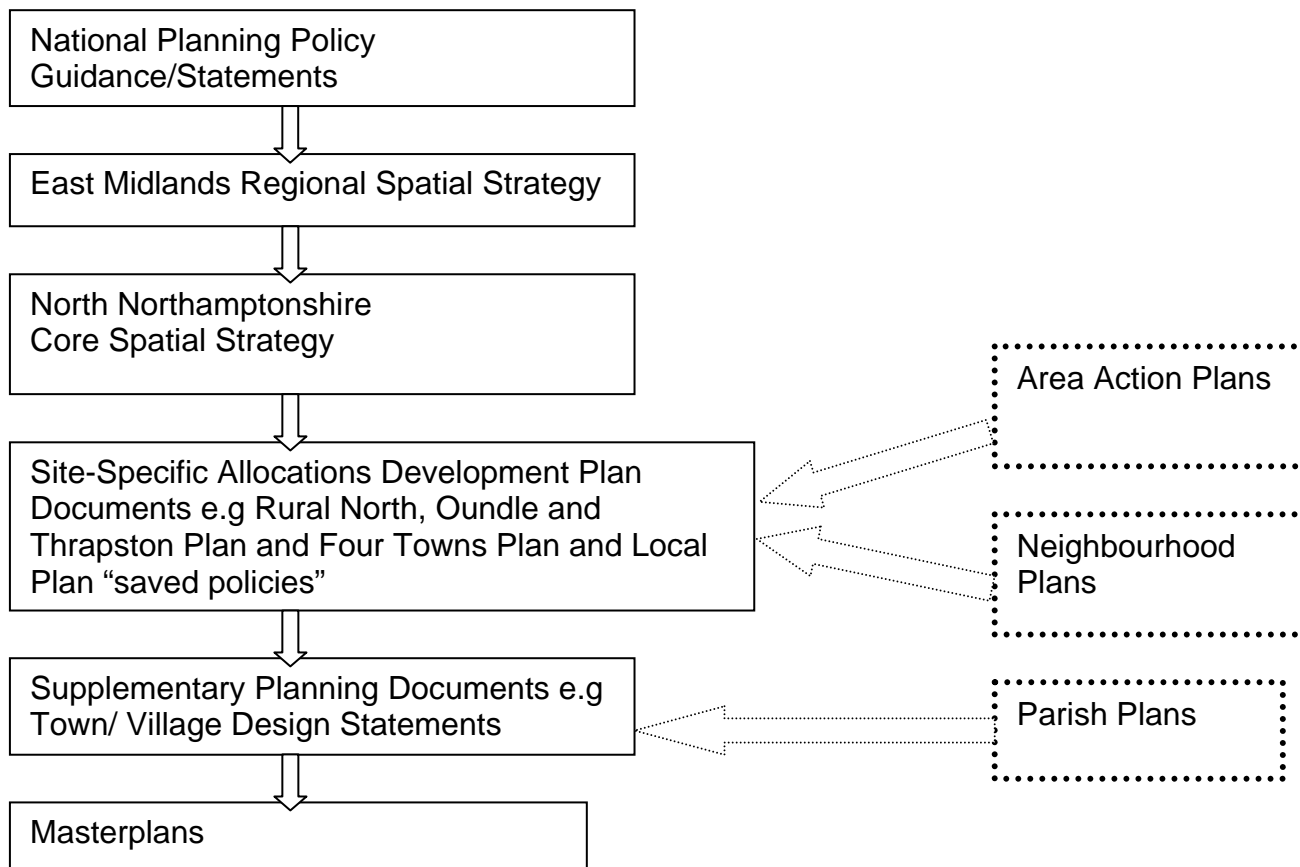
	require Developers to prepare an SPD e.g. a Development Brief for a particular development site can be adopted as SPD	contained in an Adopted Core Strategy or other Adopted DPD. An SPD cannot be prepared/ adopted if there is no relevant Adopted Policy to attach it to. An SPD cannot set new policy. SPDs form a statutory part of the LDF and, as such, a material planning consideration in determining planning applications	
Area Action Plans (AAPs)	Local Authority	AAPs are a further type of DPD. These establish a set of proposals and policies for the development of a specific area. They are normally prepared either for a town/ town centre area, in order to provide a detailed policy framework for town centre regeneration and set out specific policies and proposals, or to provide the planning context for a new urban extension. AAPs are being/ have been prepared for Kettering and Wellingborough town centres.	Consultation and Independent Examination
Neighbourhood Plans (NPs)	Local Community/ neighbourhood	NPs – details provided at Appendix 4	Consultation and “Light Touch” Independent Examination
Masterplans	Local Authority or Developer	Masterplans can be prepared for various reasons e.g. <ul style="list-style-type: none"> • By a developer to set out the vision and proposals for the development of a site (usually done for larger or more complicated sites) • by a Local Authority wishing to either identify how an area could be regenerated or how the policies within an Adopted DPD could be implemented in a specific area • by a Local Authority to 	Consultation, but No Examination

		<p>help identify community aspirations for an area</p> <p>Note: The content of masterplans cannot set policy. Instead, these serve to inform policies within statutory DPDs.</p> <p>A masterplan is a material planning consideration in so far as it sits within the agreed policy framework</p>	
Town/Village Design Statement (T/ VDS)	Local Community with Local Authority advice	<p>Design Statements are prepared by the community, but communities must work closely with the Planning Policy and Conservation Team to ensure that the content and preparation process is suitable. This will enable the Council to Adopt these Design Statements as SPDs.</p> <p>Note: The content cannot set policy.</p> <p>A T/VDS is a material planning consideration, and carries significant weight if adopted as an SPD</p>	Consultation, but No Examination
Parish Plans	Local Community with Local Authority advice, if they request it	<p>Parish Plans are prepared by the community and the Local Authority can provide professional advice, if requested to by the community. In essence these are a “Business Plan for the Community” of where they want to be as a community in the future and what they need to do to get there – content can include social, economic and environmental issues</p> <p>Elements of Parish Plans may be suitable to be taken forward for adoption as SPD, subject to their content and preparation process</p>	Consultation, but No Examination

Planning and Related Documents

The following provides a simplified flow chart of the planning document hierarchy, as a quick reference point.

Those identified with dotted text boxes and dotted arrows indicate their potential location/feed in point in the hierarchy, if they were to be prepared.



Appendix 3

Neighbourhood Plans (NPs)

- 1.1 Neighbourhood Plans form part of the Government's Localism Bill.
- 1.2 The Bill has not been enacted yet, so the detail of how NPs will work has still to be finalised.
- 1.3 Paragraphs 1.4 to 1.9 provide a summary of key points from The Localism Bill: Neighbourhood plans and community right to build - Impact Assessment (DCLG, January 2011).
- 1.4 One of the principal objectives of neighbourhood planning is to increase the rate of growth of housing and economic development in England. This will be achieved by enabling neighbourhood communities to exercise power in respect of the design and precise location of the development that takes place in the neighbourhood area.
- 1.5 In order to guarantee that neighbourhood planning cannot lead to a lower rate of growth, **a neighbourhood plan will only be able to advocate an equal or greater quantity of growth in housing or economic development than is established in the development plan.**
- 1.6 The Localism Bill will require that neighbourhood plans are in "general conformity" with the strategic elements of the development plan. The "strategic elements" will be defined through the National Planning Policy Framework and we expect that definition to include the scale (and broad location) of housing and economic development growth within the local plan area.
- 1.7 If a local planning authority adopts a neighbourhood plan that proposes less development than identified within the development plan, it cannot be legitimately adopted and may be revoked by the Secretary of State or through the High Court.
- 1.8 With specific regard to housing, a neighbourhood plan would be able to identify the specific site or broad location, specify the form, size, type and design of new housing.
- 1.9 The existence of the neighbourhood plan should increase certainty for developers. Indeed, developers will be able to approach neighbourhood communities with an offer of financial support to promote a neighbourhood plan which explicitly identifies a specific development proposal of the kind that the developer would wish to take forward. In this way, where popular support for such a proposal is demonstrated and confirmed in the referendum, the degree of certainty is increased.

- 1.10 Paragraphs 1.11 to 1.28 provide a summary of key points on neighbourhood plans made by the Planning Advisory Service (PAS), who are funded by the Department for Communities and Local Government and provide advice to Local Authorities on planning issues.
- 1.11 It is essential to put the Core Strategy in place for successful local and neighbourhood planning, as it sets the context for development.
- 1.12 NPs are set within the context of the national planning framework and the strategic plan for the area.
- 1.13 NPs are subject to examination and referendum - If 'passed', the Local Authority has to adopt the NP.
- 1.14 Once adopted, they are part of the statutory planning framework and have the status of a Development Plan Document (DPD).
- 1.15 NPs must be in line with strategic policies and will not be able to block or resist new strategic development.
- 1.16 Use the right tool for the job - different issues will need different planning responses. The aim is to use the most appropriate form of plan to achieve the required outcomes.
- 1.17 NPs are based on a neighbourhood - a Parish or a "Neighbourhood Forum" in unparished areas. The Local Authority will need to approve Neighbourhood Forums for unparished (normally urban) areas.
- 1.18 NPs are written by the neighbourhood (Parish/ Town Council or Neighbourhood Forum), not the authority.
- 1.19 NPs should guide and deliver development that meets the needs of the local area (including housing land allocations and strategic development).
- 1.20 NPs should explore ways of enabling small scale development, not stopping it.
- 1.21 NPs are permissive, not NIMBYish.
- 1.22 NPs are subject to EU requirements (i.e. Human Rights, Strategic Environmental Assessment etc).
- 1.23 What a neighbourhood might want to put in their NP, for example:
 - Identify a site(s)/broad location for housing development
 - Identify locations for community facilities
 - Identify locations for play/recreation facilities
 - Identify sites for affordable housing
 - Identify sites for community-owned assets e.g. community power scheme
 - ...and, as outlined above, specify the form, size, type and design of new housing

1.24 Certain categories of development are more appropriately planned at a higher strategic level scale than a neighbourhood and would therefore be excluded from a Neighbourhood Plan; for example:

- development which would breach thresholds for EU Directives ¹
- nationally significant infrastructure projects
- minerals and most waste development
- large scale housing/ economic development ²

1.25 The local authority has a formal role to play, which includes the following:

- Duty to Support: Where the promoters of a neighbourhood plan are able to demonstrate adequate local support for the proposed plan, the local planning authority will have a duty to provide advice or assistance on, for example, good practice in plan making, and conformity and consistency with national policy, EU law and local plans
- They will also have a duty to provide practical support - e.g. facilitating community engagement, and helping with consultation with public bodies and landowners
- Agree “the neighbourhood”
- Pre-examination check
- Organise and pay for the examination - The independent examination will be a “light touch” examination of the plan undertaken by a suitably qualified person.
- Organise and pay for the referendum

¹ The Planning Advisory Service do not identify any examples, however The Local Authority will be able to check and advise if a neighbourhood’s proposals may breach EU Directives, for example European legislation requires a Habitats Regulations Assessment to be carried out for most of East Northamptonshire’s Local Development Framework Documents to protect the integrity of internationally important nature sites. This is because certain areas of the Nene Valley have been designated as Special Protection Areas (SPAs) which relate to bird populations and Ramsar sites, which are internationally important wetlands. These are often referred to as Natura 2000 sites. The HRA assesses the likely impacts of the possible effects of a plan’s policies on the integrity of the Natura 2000 sites (including possible effects ‘in combination’ with other plans, projects and programmes.

² The Joint Planning Unit or individual Local Authorities will need to identify the larger scale housing and economic development, in order to provide a consistent approach to plan-making and decision-making. Once the Core Strategy has identified the policy approach/targets for strategic development, East Northamptonshire Council would then set out policy at a more local level on how it will address this e.g. identify the scale and type of development appropriate for different settlements

- Adopt (or not, if it contradicts the existing planning policy framework) – where the examination shows that the plan is in conformity, the local authority **has** to legally adopt the plan if agreed through the referendum
- There will be no duty on the local planning authority to provide financial assistance, other than for the referendum etc outlined above, but it may do so if it so chooses

1.26 There may be opportunities to cross-over with Local Authority Development Plan Document preparation, for example to gather evidence for neighbourhood plan work at the same time as the Local Authority gathers evidence for their DPDs or to hold joint consultation events

1.27 Some Current Queries:

- What is the process for monitoring and reviewing NPs?
- Who defends the NP policies against planning appeal/ challenge?
- Are neighbourhoods ready for the scrutiny of their work?
- Are neighbourhoods prepared to 'lead' their place?

1.28 **Some Examples of Planning Costings**

The Localism Bill: Neighbourhood plans and community right to build - Impact Assessment (DCLG, January 2011) estimates the average cost of Neighbourhood Plans at between £17,000 and £63,000. It would seem that this does not include the cost of Referendum, Examination etc. Reviewing the plan every 10 years will cost 70 per cent of the initial amount. The Government has said they will provide around £3 million a year to councils developing neighbourhood plans over the next two years. However, councils will largely be expected to find funding for the plans themselves through partnerships with developers and housing associations. Neighbourhood planning introduces a number of new costs on local authorities, some of which have been quantified and others which remain to be quantified:

Quantified costs per plan

Officer time requirements in respect of:

Conducting independent examinations £10,000

Holding a referendum £7,000

(Total quantified costs per plan £17,000)

Unquantified costs per plan

In reality, the following provide some other costing examples, which do not appear to have been included in the £17,000 and £63,000 figure given above:

- Officer time requirements in respect of geographically defining neighbourhoods in their area and providing expertise and advice to neighbourhood planning groups

The following are provided as examples of just some of the costings that may be involved in preparing a Neighbourhood Plan.

- Masterplan type documents: £50,000/1yr consultants' fees (note: masterplans are optional i.e. can be prepared, but do not have to)
- Environmental Impact Assessment (if required): £50,000 min, typically £75,000
- Strategic Environmental Assessment (SEA/ SA) (required): £10,000-£30,000 (mid-point £20,000)
- Habitats Regulations Assessment (required): £15,000
- Retail Impact assessment (if required): £5,000
- Equalities Impact assessment (if required): £5,000
- Community safety assessment (if required): £5,000
- Consultation costs: *Planning for Real* type event: £5,000-£10,000 (note: consultation will be required, but format not specified)
- Examination costs (required): £5,000- £8,000

Costs of running a local referendum: £1.50/head (£7,000/ward) inc. volunteers
 source: *Fees and charges for counting officers in the regional and local referendum (ODPM 2004)*

Appendix 4

Evidence Base for Four Towns Plan

The following areas of evidence-base work have been undertaken or are ongoing. This appendix provides information to act as a guide to the amount and type of work that feeds in to the preparation of a Development Plan Document.

It should be noted that this is not an exhaustive list, but provides a flavour of the work that has or is being undertaken, which will act as a potential evidence base for policy development for the Four Towns Plan. All of the work areas involve ENC officer input.

Some studies are County or North Northamptonshire-wide, but are also relevant to planning policy development for the District overall.

Abbreviations:

EMDA = East Midlands Development Agency

ENC = East Northamptonshire Council

NCC = Northamptonshire County Council

NNJPU = North Northamptonshire Joint Planning Unit

RNRP = River Nene Regional Park

Note: Within the Progress column, the lead organisation(s) for the work area is/are listed in brackets at the end.

Work Area	Progress
Strategic Flood Risk Assessment (SFRA)	Specialists have been appointed by ENC to carry out the technical SFRA for the Four Towns Plan area. Work commenced in November 2010 and Stage 1 of this assessment will be completed in July/ August 2011. Stage 2 assessment will be required once draft site allocations proposals have been developed (ENC)
Flood Risk Management Study Update	Specialists have been appointed by the JPU to examine flood risk management options in support of the revised CS. An interim report is expected July 2011 and full report in October 2011 (JPU).
Habitats Regulations Assessment (Appropriate Assessment)	Specialists have been appointed by ENC to carry out this technical assessment for the Four Towns Plan area. Work commenced in February 2011 and the initial (Stage 1, screening) stage is due to be completed by end July 2011. Further work is required/dependent upon the draft site allocations proposals being developed (ENC)

Strategic Housing Land Availability Assessment (SHLAA)	ENC have supplied information to the NNJPU, who are compiling updating the February 2009 SHLAA for the whole of North Northamptonshire – expected July/ August 2011 (ENC/NNJPU)
Strategic Housing Market Assessment (SHMA)	Last SHMA for North Northamptonshire housing market area completed/ published July/ August 2007 – next update anticipated to be undertaken in 2012 (ENC/NNJPU)
Northamptonshire Strategic Employment Land Assessment (SELA)	Completed in November 2009 (NCC/ Atkins)
Employment Land Review/ Site Assessment	Ongoing (ENC). Work in progress to update previous East Northamptonshire Employment Land Review (Atkins, December 2006)
Transport Assessments	Ongoing (NCC). Many projects, e.g. emerging Local Transport Plan review, Northamptonshire Arc, Delivering a Sustainable Transport System etc
Brownfield Land Allocation Plan (BLAP)	Northamptonshire BLAP completed August/ September 2010 (EMDA)
Urban Structures Study	Started April 2011 – expected to be completed Summer 2011 (ENC/NNJPU)
Landscape Character Assessment	Expect to commence Autumn 2011 (ENC)
Open Space Strategy	Draft Open Space SPD prepared and ready to commence consultation July 2011 (ENC)
Market Towns Regeneration:	
Irthlingborough Masterplan	Commenced by specialists 2011 and due to complete Winter 2011 (ENC)
Raunds Masterplan	Completed March 2011 (ENC)
Rushden Masterplan	Completed June 2010 (ENC)
Infrastructure Plan	Ongoing (ENC)
Retail Assessment	
North Northamptonshire Retail Capacity Update Final Study	Completed February 2011 (NNJPU)
Market Towns Study	Completed by specialists 2011 (NNJPU)

Retail Frontage Survey	Carried out annually (ENC)
Biodiversity Action Plan	Current BAP completed in 2008 by Northamptonshire Local Wildlife Trust (LWT); updated September 2009. Followed by preparation of North Northamptonshire Biodiversity SPD, anticipated adoption summer 2011 (NNJPU/ LWT)
Sustainable Energy Strategy	Completed in 2010 (NNJPU)
Local Listing (Buildings of Interest)	Ongoing (ENC)
HGV Parking Study for A14	Completed in 2010 (NNJPU)
Green Infrastructure Plan	RNRP completed some work in 2008. NNJPU undertaking further work to be completed in 2011 (RNRP/ NNJPU)
Strategic Sports Facilities Framework	Completed in April 2010 (NNJPU)
Strategic Cultural Strategy	Completed in February 2010 (NNJPU)
Sustainability Assessment	Will be required as policy is developed (ENC)
Gypsy and Traveller Sites	The current Northamptonshire Gypsy & Traveller Accommodation Assessment (March 2008) is valid until 2012. This informed minimum additional pitch requirements in the East Midlands Regional Plan for the period 2007-2012 (Policy 16/ Appendix 2). It also sets out projections until 2017 (NCC/ NNJPU). Discussions are currently being held regarding a refresh of the study