

North Northamptonshire Joint Core Strategy 2011-2031
Pre-Submission Plan
Statement of Consultation
January 2015

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Statement of Consultation

1. Introduction

1.1 The North Northamptonshire Joint Core Strategy (JCS) review has incorporated a number of stages of consultation. The Town and County Planning (Local Planning) (England) Regulations 2012 ("the Local Plan Regulations") require the Local Planning Authority to include amongst its proposed submission documents:

a statement setting out:

i. which bodies and persons were invited to make representations under regulation 18
ii. how those bodies and persons were invited to make such representations;
iii. a summary of the main issues raised by those representations and
iv. how those main issues have been addressed in the DPD (JCS).

1.2 The Local Plan Planning Practice Guidance sets out that there is considerable flexibility open to local planning authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in regulation 18 of the Local Plan Regulations on consultation, and with the commitments in their Statement of Community Involvement.

1.3 This Statement sets out the consultation that has been undertaken in the development of the JCS, and how the issues identified have informed the development of the Pre Submission JCS. It should be read alongside the evidence base and other background documents which have also informed the Pre-Submission JCS and are available on www.nnjpu.org.uk. The relevant stages of consultation in the development of the Pre-Submission JCS are listed below:

- Consultation on the scope of the JCS (previously Regulation 25 of the 2008 Town and Country Planning (Local Development) (England) Regulations, as amended, in force until April 2012)
- Consultation on Issues
- Consultation on an Emerging JCS
- Consultation on elements of the JCS (Interim Consultation)

1.4 Alongside these distinct stages of consultation, additional work was undertaken through a series of workshop sessions (2009-10) to understand North Northamptonshire in more detail, as part of the Place Shaping approach to the JCS review. These are also referred to within this Statement in section 3. The work undertaken in the development of the JCS, and the timetable to adoption is set out overleaf.



The review of the Joint Core Strategy

Duty to Cooperate

1.5 The development of the JCS has been informed by constructive, active and ongoing engagement with adjoining planning authorities and public bodies, alongside formal consultation. This is critical to ensure that the Joint Committee satisfies the requirements and spirit of the Duty to Cooperate and that the Plan addresses cross-boundary strategic matters including Transport Linkages, Green Infrastructure and health care provision. This has included:

- Ongoing dialogue with the West Northamptonshire Joint Planning Unit including involvement in respective Local Plan work (the development of the West Northamptonshire JCS) and the use of the same consultants/methodologies for technical studies where possible;
- Meeting or communication with all neighbouring authorities October-December 2013 to discuss strategic issues, notably Objectively Assessed Needs for housing and the extent of Housing Market Area (HMA) boundaries;
- Maintaining ongoing dialogue with neighbouring authorities including sharing evidence on relevant issues.
- Ongoing engagement in the Local Plan work of neighbouring authorities;
- A specific meeting to discuss Highways and Transport issues with neighbouring authorities, Highways authorities and the Highways Agency in December 2013;
- Informal engagement with key agencies in the refinement of the JCS throughout 2014;
- Meeting and continuous informal dialogue with key stakeholders, including infrastructure providers and environmental bodies, to refine the policies in the development of the Pre-Submission JCS and inform the development of the Infrastructure Delivery Plan that accompanies the JCS;
- Contacting all neighbouring authorities in November 2014 bringing their attention to the publication of sections A-C of the JCS, and offering the opportunity to meet to discuss any relevant strategic matters.

1.6 This work and engagement has reiterated that North Northamptonshire should be regarded as a functional Housing Market Area and established that neighbouring authorities in West Northamptonshire and Bedfordshire are still planning for significant growth, as are Peterborough and Huntingdonshire to the east. It has confirmed that adjoining areas are not reliant on North Northamptonshire to take any of their objectively assessed housing need and vice versa. It has also ensured that the JCS reflects the infrastructure requirements and methods of service provision of infrastructure providers.

2. Consultation on the scope (Regulation 25 consultation, Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008) February – March 2009:

2.1 A six week consultation about the scope of the review of the JCS was undertaken from 16th February to 30 March 2009, in accordance with Regulation 25 of the previous Town and Country Planning (Local Development) (England) Regulations 2008. This is now Regulation 18 of the current (2012) Local Plan Regulations.

2.2 A consultation document was produced that invited comments on the focus of the review, based around four questions.

1. Are there any further subjects, topics or themes which the Revised CSS should contain?

2. Are there any aspects of the CSS that need to be clarified or refined?

3. Are you happy that the various studies and baseline information provide a complete and up to date Evidence Base for the CSS review?

4. Do you have, or are you planning to collect, any information you can share with the NNJPU to help develop Options for consultation later this year?

2.3 All consultees listed in the JPU consultation database were informed directly of the consultation (largely using the Limehouse online consultation portal). Comments were submitted via Limehouse or were received in other formats and copied into Limehouse, in order that they could be widely viewed. The consultation response was reported to the Joint Committee at its 9th July 2009 meeting[1].

Issues raised through consultation on the scope of the JCS:

2.4 In all, 38 respondents submitted over 100 individual comments. These focused on the following:

- The regional plan review and the need to build in flexibility to deliver beyond 2026;
- The economic slowdown and short- medium term deliverability of housing, linked to the need for a clear infrastructure strategy and delivery programme;
- Cross boundary considerations- linkages with both West Northamptonshire and the Peterborough-Cambridge area;
- A greater steer and more certainty needed on rural issues, in particular the settlement hierarchy, agricultural diversification implications and housing affordability;
- The need to pick up on recent changes to national policy relating to Energy and Climate Change (linked to current work on the sustainable energy strategy) and on changes to the Heritage system;
- Sustainable Urban Extensions should remain the areas of focus due to the resources committed to their delivery and the JCS should include strategic allocations in order to streamline the plan making process;

[1] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/1753/Committee/383/Default.aspx (Relevant report is Item 5)

- Smaller SUEs needed in the smaller towns and the potential for a new village in the north of the area;
- The vision and objectives should be reviewed to take account of progress on the ground, particularly at Corby;
- Design is a cross cutting issue that should be ingrained in the JCS if sustainable communities are to be achieved, picking up both on local characteristics and on secured by design principles;
- The need to take advantage of the greater role of Core Strategies as set out in revised PPS12 (June 2008), giving opportunities in future to rationalise the number of development plan documents in preparation by giving a much clearer steer in the JCS.

How the main issues raised were addressed:

2.5 The responses broadly reflected the range of topics already proposed in the JCS review. They also echoed a general feeling that more emphasis was needed on how distinctive places across North Northamptonshire should develop in the longer term. The response to the consultation informed early work on the JCS, including the issues to be explored through place making workshops.

2.6 The report to the 9th July 2009 JPC outlined the work that the JPU was undertaking with the Commission for Architecture and the Built Environment (CABE) and Transform MKSM (the architecture centre for Milton Keynes and the South Midlands) to look at how to embed the 'place shaping' principles of strategic urban design into the plan making process.

2.7 It was considered that the proposed 'Place Shaping' approach should seek to focus as far as possible on the quality of places that communities would like to see in 20 or more years' time. The proposed process would engage key stakeholders in developing and explaining genuine choices for the future of North Northamptonshire that can be consulted on as widely as possible. This would focus on the quality and sustainability of North Northamptonshire and the places within it; to refine and consolidate the strategy of the adopted JCS and to explore and test proposals for the period to 2031.

3. Place Shaping Workshops

3.1 As referred to in paras 2.4 and 2.5, a key element to the JCS review has been a 'Place Shaping' approach focussing on the quality of places in North Northamptonshire, to develop a more distinctive plan. To understand the diverse nature of North Northamptonshire and the issues that affect neighbourhoods, the Joint Planning Unit undertook a number of 'Place Shaping' workshops. These included:

- September 2009 *'Understanding Places'* Workshop
- January 2010 Rural Workshop
- February 2010 Small Towns Workshop
- March 2010 'Options Development' Workshop

September 2009 Workshop- Understanding Places

3.2 The Understanding Places Workshop introduced the Place Shaping agenda as part of the JCS review. A detailed Outcomes[2] report of the Workshop was produced by the JPU.

3.3 The Workshop sought to develop:

- an understanding of how places have developed, opportunities for their continued change and identification of the main challenges to delivery;
- a shared view on the identity of the sub-region and the places within it;
- an agreement on the strategic themes to form the basis for development of spatial options to be considered in a further workshop;
- an understanding of how change could be managed in order to create the quality and character of places that is sought.

3.4 Prior to this workshop, delegates were provided with a Briefing Pack that set out issues and questions relating to seven key themes, and which were informed by responses to the Regulation 25 consultation. The seven key themes were:

- Economic Development
- Energy and Climate Change
- Green Infrastructure and Water
- Housing
- Social Infrastructure
- Town Centres
- Transport and Model Shift

3.5 These key themes were used to steer discussion and analysis of the specific issues that affect the places within North Northamptonshire, and the opportunities that these present.

3.6 The September Workshop identified a range of detailed place based issues, and 'Big Ideas'- major opportunities for North Northamptonshire to deliver change over the next 20-30 years. These included:

[2] http://www.nnjpu.org.uk/docs/Outcomes%20Report.pdf

- 'Carbon Sink Forest' widespread tree planting in the Rockingham Forest area, which can not only capture carbon dioxide from the atmosphere, but also has a range of other benefits including promoting recreation and tourism, providing local timber and wood fuel supplies, and linking wildlife habitats.
- 'Northamptonshire Arc' building on significantly enhanced transport connections between the 3 Growth Towns (plus Rushden) and Northampton, to provide a focus for regeneration activity aiming to make Northamptonshire an excellent place to live and work.
- 'New Eco Village' a high quality settlements where new jobs and services support around 1000 new homes, which could become a new 'service centre' for the villages around it.

3.7 Alongside a detailed analysis of specific place based issues, opportunities and aspirations, the workshop provided some guidance on 'must haves', or key objectives that should frame the development of spatial options:

- Increasing robustness and resilience to long term change (e.g. climate change, economic pressures)
- Increasing self-reliance- meeting more of people's needs locally (e.g. employment opportunities, retail attractions, energy supply)
- Reinforcing the special mixed urban/rural character of the area (e.g. the roles played by the rural area and small towns, the integration of town and country).

Rural and Small Towns Workshop January and February 2010

3.8 These workshops were held in January and February 2010 and took forward the issues identified from the Regulation 25 consultation and the September Workshop, as well as those that had arisen from implementation of the 2008 CSS through planning applications and plan making by the districts/ boroughs. A report[3] of the Workshops was produced by the JPU. The workshops sought to achieve the following outcomes:

- An understanding of the different components of the rural and small town areas and the diversity that exists within them
- An understanding of the potential of the countryside and the small towns set within it, and the ability to respond to global environments and economic changes; and
- Agreement about what future work will be needed in order to develop a more flexible and positive policy approach for the revised joint core strategy.

Key messages arising from Rural Workshop

- The rural area is diverse, and the broader policy approach in the adopted core strategy will need to be revisited to ensure that different issues and opportunities are fully addressed in policy terms;
- In respect of services, a number of villages operate in clusters i.e. one village may not have a shop but people travel for day to day items to the neighbouring one which does;
- Differences in types of villages
- The rural service spine was considered a relevant concept, but how it functions and the suitability of public transport to link it together was questioned;

[3] http://www.nnjpu.org.uk/docs/Rural%20Areas%20&%20Small%20Towns%20Workshop%20Report.pdf

- Most stakeholders did not want to preserve the villages in aspic and were content that some development took place, so long as it do not change the character of the village or over-burden services or roads.
- Certain villages in North Northamptonshire are of such character that conservation should be the predominant aim.
- A key issue was the area's beauty and green spaces, with the protection of these (including village greens and playing fields) identified as being necessary.
- Improving rights of way networks, particularly bridleways, and enhancing connectivity through green infrastructure is a significant opportunity.
- It will be important that the role of Rural Estates is fully considered, and there was agreement that the role of Estates is underplayed and there is more potential to work with them.
- Greater emphasis should be placed on stimulating economic development within the rural area. Ideas include the Carbon Sink Forest and North Northamptonshire becoming a centre of excellence for renewable technology.
- Planning Policy Statement 4 *Planning for Sustainable Economic Growth* was welcomed and groups considered that it could be positively taken forward to allow North Northamptonshire to become an exemplar of rural diversification.
- Enhanced public transport affects all elements of the rural area and connections need to be improved.

Key messages arising from Small Towns Workshop

- The sense of community, social cohesion and good proximity to facilities were seen as positive elements of the small towns. The quality of life brought about by proximity/access to the countryside was also highlighted as a positive.
- Key negative issues related to the lack of services and infrastructure, lack of transport facilities, and the decline in retail. The impact of loss of industry/lack of jobs also raised a key concern that small towns increasing act as dormitory settlements.
- Oundle was ranked as the most vibrant centre (scoring highly on quality of life and ability to meet needs). In contrast, Desborough and Irthlingborough were identified as the small towns most in need of regeneration.
- Rushden was acknowledged as the main small town, Waitrose was recognised as an important asset in drawing people from surrounding areas.
- General consensus that villages look towards the small towns for services and that Rushden acts as the main settlement within East Northamptonshire being the biggest of the small towns.
- Desborough and Rothwell were considered to have a strong functional relationship, and important links with Market Harborough and Kettering, and out commuting is an issue.
- Burton Latimer was referred to as being 'joined at the hip' with Kettering a strong functional relationship strengthened by good public transport links. The town was felt to have a tight sphere of influence.
- Burton Latimer's future relationship with Kettering was discussed, and whether it would effectively become a suburb of Kettering. Ideas included the future role of Burton Wold Wind Farm and the potential for a renewable energy park to enhance environmental skills in North Northamptonshire.
- Most groups concluded that Irthlingborough, Rushden and Higham Ferrers (and to some extent Raunds) acted as one functional area.

- Raunds was considered to operate as a dormitory settlement, with people moving to Raunds for cheap housing and looking to Bedford for jobs.
- Oundle has a close functional relationship with Peterborough for higher order shopping and work purposes but is increasingly looking to Corby for shopping. Local villages look to Oundle for services.
- The need for enhanced employment was a recurring issue in respect of small towns, alongside the need for each town to have a clear vision. Similarly, the need to link new communities with the existing ones, and particularly to encourage use of town centres by residents, was a key issue/aspiration.
- The diverse range of small towns was evident. Preserving the high quality and character of Oundle was considered as the most important, with similar views expressed about Higham Ferrers, Rothwell and to a degree, Thrapston. In contrast, the lack of jobs was identified as an important issue in Irthlingborough, Desborough, Rothwell and Raunds.
- The role of the River Nene and the connections that this provides between the small towns was identified as a key opportunity. An enhanced tourism role for the River Nene should be considered with the towns along the Nene each performing a distinct with the towns along the Nene each performing a distinct function. Capitalising on the *'Nene Valley Brand*' will be important.

Conclusions from Rural and Small Towns Workshops

3.9 The overarching conclusion from the two workshops was the significant complexities that exist within North Northamptonshire and the different issues faced by settlements, with specific opportunities that arise from this.

3.10 A number of ideas were raised at both workshops and it was recognised that these would need to be fully tested through the review process, particularly in respect of deliverability. It was evident that there was a broad commitment and agreement from Stakeholders to ideas such as the Carbon Sink Forest, and an enhanced tourism role for the River Nene. The revised Core Strategy was considered to provide an opportunity to embed these ideas in policy.

3.11 It was recognised that the different elements and issues would be tested and explored through the joint core strategy (JCS) review. It was considered that the place shaping focus of the review would help to develop a strategic framework that reflects these locally distinctive elements. It was recognised that employment, public transport and infrastructure investment were recurrent themes and will be fundamental parts of the review.

3.12 A number of recommendations for further work arose from the two workshops relevant to both the JPU and the partner local planning authorities. The JPU took forward a number of these actions, to develop the issues consultation.

'Options Development' Workshop March 2010

3.13 The March 2010 Workshop sought to take forward the information and issues, including 'Big Ideas' that arose from the previous workshops to use these to identify a set of 'reasonable alternatives' for the future of North Northamptonshire to aid wider public involvement. The Workshop also sought to outline a quality agenda to address place specific issues and help to focus further technical work to test spatial options. A detailed report[4] on the Workshop was produced by the JPU.

3.14 The strategic 'themes' that arose at the September 2009 Workshop, informed the March options development workshop:

- increasing robustness and resilience to long term change (e.g. climate change, economic pressures)
- increasing self-reliance- meeting more of people's needs locally (e.g. employment opportunities, retail attractions, energy supply)
- reinforcing the special mixed urban/rural character of the area (e.g. the roles played by the rural area and small towns, the integration of town and country)

3.15 The outline options that emerged from the workshop discussions were different combinations based on having *four* main centres (Corby, Kettering, Wellingborough and Rushden) with higher or lower levels of economic and social dependency on Northampton. The Options had working titles of:

1. *Core Strategy Plus*- concentrates on Corby, Kettering, Wellingborough and Rushden) with higher or lower levels of economic and social dependency on Northampton.

2. *Twin Poles*- seeks greater economic self-reliance for Wellingborough and Rushden areas but sees a significant amount of housing growth in Corby and Kettering.

3. *Northern Focus*- concentrates more on Corby and Kettering and providing a counterpoint to Northampton, with Wellingborough and Rushden becoming more dependent on Northampton.

4. *External Links*- is about improving connectivity between Northampton and the urban core, recognising the dominant role of Northampton and planning for growth along key transport corridors, complemented by new rapid transit systems.

Taking the March Workshop forward

3.16 Taking the JCS review forward from the March 2010 workshop was undertaken during a period of significant government reform of the planning system. The government re-instated its intention to revoke regional strategies in the Localism Bill. The JPU noted that the removal of regional strategies re-opened the debate about the level of growth that may be needed or required and gave flexibility to reconsider the level of growth that is appropriate over and above existing commitments (or if existing commitments are not viable).

3.17 It was recognised that the Place Shaping focus of the JCS review fitted well with the Government's localism agenda; but that there was a need to assess what alternative provisions may replace the regional strategy targets. In developing the options further, it was recognised that the focus should on addressing the issues about the quality of

[4] http://www.nnjpu.org.uk/docs/March%20workshop%20Outcomes%20Report.pdf

place and on taking forward the common elements where there is widespread support from the consultation and work undertaken to date:

- Further work on the existing urban areas and the potential for revitalisation or change
- An enhanced role for Rushden, along with more clarity on the potential of the smaller towns
- Planning positively for the rural area as a living, working countryside
- The green agenda – enhancing the potential and different characters of the riverside towns and the forest towns, including delivery of the Nene Strategy and the Carbon Sink Forest
- The role of environmental technologies in diversifying the economy

3.18 The outline options dealt with the broad spatial issues that must be addressed through the review, in particular connectivity, both within North Northamptonshire and to the surrounding areas. It was recognised that the options would have to be developed further through Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA)/ Appropriate Assessment (AA) in relation to potential effects on the (at the time) proposed Upper Nene Valley Special Protection Area/ Ramsar site.

3.19 This changing government context informed how the March Workshop and the Spatial Options arising from it could be taken forward. At a seminar on 7th December 2010, Members of the Joint Planning Committee (JPC) considered how consultation could be framed in order to reflect the emerging principles of neighbourhood planning being proposed through the Localism Bill. At the same time, it was recognised that it would be necessary for technical work to be undertaken on options (or 'reasonable alternatives') in order to meet the requirements of the Strategic Environmental Assessment Regulations.

3.20 The Joint Planning Committee agreed that public consultation should be refocused around local issues, with consultation on an Issues Paper.

3.21 The detailed Place Shaping work identified a number of key issues, including 'Big' ideas, particularly in relation to:

- **Further work on the existing urban areas and the potential for revitalisation or change**
- **An enhanced role for Rushden, along with more clarity on the potential of the smaller towns**
- **Planning positively for the rural area as a living, working countryside**
- **The green agenda- enhancing the potential and different characters of the riverside towns and the forest towns, including delivery of the Nene Strategy and the Carbon Sink Forest**
- **The role of environmental technologies in diversifying the economy**

3.22 Furthermore, a number of key strategic themes arose from this work:

- **increasing robustness and resilience to long term change (e.g. climate change, economic pressures)**
- **increasing self-reliance- meeting more of people's needs locally (e.g. employment opportunities, retail attractions, energy supply)**
- **reinforcing the special mixed urban/rural character of the area (e.g. the roles played by the rural area and small towns, the integration of town and country)**

4. Issues Consultation February – March 2011:

4.1 The JPC agreed the Issues paper for consultation on 20th January 2011[5]. The content of the Issues paper was based around questions and general issues that arose from workshops and technical work that had been undertaken since 2009. The format of the document was intentionally short and written in a non-technical way as far as possible.

4.2 A brief introduction was included on the purpose of the document and where the review was starting from, to give some context. A section called 'Your Issues' introduced people to some of the place shaping factors that the Plan needs to consider, and asked what the issues and opportunities were in their area/ neighbourhood.

4.3 A section on wider issues summarised some of the 'larger than local' considerations that the Plan would need to tackle. Questions were set under each heading, with the aim of moving the debate further from previous work. The areas covered were:

- countryside and villages
- town centres
- market towns and the role of Rushden
- services and facilities
- new homes and population growth
- employment

4.4 Finally, there was a section setting out details of how to comment on the document.

4.5 The Issues Paper was consulted on for 6 weeks from 14th February until 28th March 2011. Given that this was an informal (i.e. non-statutory) consultation, late responses were also included in analysis of responses.

4.6 The Issues consultation was undertaken in accordance with the principles of the Participation Action Plan[6](January 2009 and updated) which set out the key consultation principles for the review, and incorporated the following:

- Distributing over 1500 copies of the Paper including to all Road Show attendees (see below), parish councils and individuals who requested a copy and making available at all North Northamptonshire libraries and council offices;

- Notifying everyone on the JPU consultation database of the Issues consultation and how to view the document on the JPU web site, and respond to the document;

- An information campaign in the local media including radio interviews and articles in the local press to ensure people knew about the consultation and how they could air their views and respond, including promoting the @yourplace web site;

- Undertaking a series of road shows which incorporated staffed information and activity stalls in busy public areas. Road shows were held in Kettering, Corby, Rushden, Wellingborough, Oundle, Thrapston, Irthlingborough, Desborough, Raunds, Higham Ferrers, Rothwell and Burton Latimer;

[5] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/1881/Committee/414/Default.aspx (Item 4)
[6] http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1077

- Officers from the JPU attended a range of events and meetings with other groups including Local Strategic Partnerships, Parish Councils, the Business Community, Youth Councils and East Northamptonshire Sixth Formers;

- Running a 'Postcards from the Future' competition where people were asked to design a postcard describing what their home town or village will be like in 2031.

4.7 In addition to feedback recorded at the road shows and other meetings, over 190 written responses were received to the consultation. Consultation responses were reported to the 23rd June 2011 JPC[7].

Issues raised through the Issues consultation

4.8 It was evident from the issues consultation that there was still broad support for the overall approach of the adopted Plan and the spatial strategy and policies within it. A number of responses sought refinements to the strategy, particularly in relation to the role of the smaller towns and rural areas and the promotion of alternative Sustainable Urban Extensions (SUEs) but there was still general support from many consultees for the overall approach in the adopted Plan and the infrastructure strategy within it. A range of comments related to the need for additional policy guidance on specific issues such as tourism and the need to update and refresh key policy areas such as the Green Infrastructure Strategy.

4.9 The Issues consultation was particularly useful in providing validation of the previous work that the JPU had undertaken as part of the place shaping approach to the review by testing the specific issues and conclusions that arose from this work. Significantly, the conclusions of the Small Towns and Rural workshops were borne out by the Issues consultation. It was clear from the consultation that a one size fits all" approach to the Small Towns was not considered to reflect the different needs, character and opportunities that exist.

4.10 Having considered the issues consultation responses, the JPU considered that that there were a number of key issues relating to specific areas of the JCS where an early steer from the Joint Planning Committee should be sought. It was noted that a number of these were key issues that had been raised throughout the development of the adopted CSS and were also raised through the Regulation 25 consultation and place making workshops. These key issues were set out for the JPC to consider and are set out below.

Key Issues:

Housing targets

4.11 Whilst the partner local planning authorities and infrastructure providers supported lower housing targets, many in the development industry did not support the approach that was set out in the Issues Paper and the Statement of Intent (where the JPU invited comments on its proposed approach to reviewing housing targets in the light of the Government's abolition of regional plans) that preceded this.

[7] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2026/Committee/414/Default.aspx (Item 5)

4.12 A report on reviewing housing requirements for North Northamptonshire in the light of the CALA Homes Judgement was discussed elsewhere on the 23rd June 2011 agenda. The JPU considered that the emerging approach to housing targets was robust and based on extensive evidence and consultation. Some of the issues raised over wider barriers to housing delivery and reliance on the Sustainable Urban Extensions would need to be considered in developing the Preferred Options. However, it was clear that there was still broad support for maintaining the growth town focus in the JCS review.

Spatial Strategy/ New Village

4.13 A significant issue in relation to the spatial strategy was the promotion of a new village at Deenethorpe airfield. This proposal would represent a significant change to the spatial strategy within the adopted CSS. It was recognised that the potential for a new village would need to be tested as part of the review of the JCS and the assessment of spatial options. It would be important to consider how a new village would function as part of the settlement hierarchy, particularly given the proposals proximity to the north east Sustainable Urban Extension to Corby. Furthermore, the extent to which a new village in East Northamptonshire contributes to the housing requirements for that district, and the level of development distributed to other settlements in the district would need to be considered.

4.14 It was evident from responses specifically to the Deenethorpe site that there was support for considering and testing the proposal further through the development of the JCS and significant work would be needed to consider the impact of the site and its relationship to Corby and its future development. It was acknowledged that the promoters of the scheme hadinitiated this process with officers from the JPU, and Officers and Members from Corby Borough and East Northamptonshire Councils.

The role of Rushden

4.15 It was evident from work undertaken to date on the JCS Review that there was support for enhancing the role of Rushden, building on its already identified status as the fourth main town in North Northamptonshire. It was recognised that consideration would be needed as to what enhancing the role of Rushden would entail in respect of the distribution of development at the settlement, and whether its fourth main town role needs to be reflected by directing a greater level of housing development to the town and whether there is capacity for this. The implications of this would be assessed through the testing of spatial options and local concern that development should not go beyond the A6 at Rushden was noted. A planning application was anticipated for retail and leisure development at Rushden Lakes. Although this could provide a strategic opportunity to enhance the role of Rushden, it was recognised that its impact on Rushden town centre and other settlements in North Northamptonshire would need to be fully assessed.

4.16 The longstanding commitment of East Northamptonshire Council to the regeneration and enhancement of Rushden was noted and it was recognised that the background research undertaken/ongoing by the ENC Planning Policy team would be important in developing the preferred options. The role of Rushden and policies to facilitate its regeneration would be an important element of the preferred options. It was noted that consideration was being given to potential changes to existing land use i.e. re-use of existing employment sites/ areas for residential use and re-location of employment use

to other areas of the town. There was also some concern that Rushden had become a dormitory town, as employment has not kept pace with housing construction.

4.17 When considering and assessing the role of Rushden it was recognised that its impact on the other settlements in North Northamptonshire, particularly the three Growth towns, would need to be carefully considered. A number of respondents considered that development in Rushden and the market towns in general should be carefully managed to ensure that the scale of development is commensurate with the role and function of the settlement and does not damage the established spatial strategy in North Northamptonshire by competing with the Growth Towns.

Employment Strategy and the role of B8

4.18 The need to provide additional jobs in North Northamptonshire, particularly for local people, was a key issue. A number of mechanisms were identified to achieve this and the development of the preferred options would need to consider all of these mechanisms. Within the rural area, diversification, including an emphasis on SMEs and enhanced broadband provision were seen as key mechanisms for stimulating the economy. It was evident that the JCS review needed to support the delivery of enhanced broadband provision and this will require close working with key delivery agencies. An enabling framework to facilitate appropriate rural diversification opportunities would also need to be set out within the revised JCS.

4.19 There was broad support from the development industry and the partner Local Planning Authorities for the identification/allocation of larger than local 'strategic' employment sites within the JCS Review. A number of local residents also supported the identification of these sites to deliver employment development for North Northamptonshire. A number of strategic employment sites were promoted by the development industry for inclusion in the JCS. The JPU would need to consider the approach that it took to the identification or allocation of strategic employment sites within the JCS review, within the context of the spatial strategy for North Northamptonshire and the overall quantum of development. It would be important that sites were fully assessed against deliverability and viability criteria and subject to sustainability appraisal. It was considered that this would allow the JCS to take forward the most appropriate strategic sites to meet the needs of North Northamptonshire. It would be important to fully use existing technical studies such as the Strategic Employment Land Assessment (SELA) and work undertaken by the partner Local Planning Authorities when assessing sites.

4.20 The role of B8 would need to be further considered within the development of the preferred options. There was an acknowledgement from Northamptonshire Enterprise Limited (NEL) and the development industry that this would remain an important sector for the economy and Kettering and Corby Borough Councils noted that it could potentially unlock higher value employment uses. Additional technical work would be needed to assess the quantum of B8 as part of the employment strategy for North Northamptonshire. As set out in responses to the issues consultation there would need to be further assessment of current stock of B8, levels of vacancies and take up, and the scale of sites that are required by the market, and how this relates to the wider spatial strategy in the JCS. There were clear preferences for the location of B8 development in responses and these would need to be taken forward within the policy framework of the JCS. The development of the policy approaches would need to consider whether more emphasis should be placed on the percentage of B8 uses on

sites, and whether restrictions were needed to secure other forms of employment development an approach advocated by Kettering and Corby Borough Councils.

The Rural Area

4.21 It was clear that further consideration of the role of the rural area and the rural settlement hierarchy was necessary. A number of responses supported additional development within the rural area to help support service retention. It was recognised that the quantum of development in the rural area other than any strategic sites would be likely to be driven through neighbourhood plans, Site Specific DPDs and a continuation of 'windfall' development within the villages. Responses indicated that a more detailed rural settlement hierarchy in the JCS would help guide these local decisions. It was clear that enhanced broadband provision, access to public transport links and increased affordable housing provision would be key elements for the rural area within the JCS review. It was acknowledged that the partner Local Planning authorities had undertaken evidence gathering as part of the development of Site Specific Development Plan Documents and this work would inform the development of the preferred options. Kettering Borough Council and East Northamptonshire Council were clear that their own development plan documents should provide detail on the rural area and the villages within it. Given the emphasis on rural diversification, flexibility and deregulation set out in a number of responses, it would be important to consider how the JCS could provide a robust framework for the rural area, yet one which allows sufficient flexibility, particularly within the context of the neighbourhood planning agenda.

4.22 There was broad support for village boundaries from local residents in order to retain rural character, and avoid coalescence and urban sprawl. Both Kettering Borough Council and Corby Borough Council supported the identification of village boundaries. Kettering Borough Council set out that consultation with the Borough's Parish Councils had already highlighted local support for village boundaries and stated that the approach to village boundaries should be identified within the Site Specific Proposals LDD and not through the Core Strategy Review. In contrast, East Northamptonshire Council considered that boundaries had restricted growth and the drawing of boundaries is not a necessity. The council set out that it would instead support a criteria-based approach to make boundary decisions, which would enable planning decisions to be made on a site-by-site basis. They suggested that the criteria should be flexible enough to provide for some development, in order to enable villages to be sustainable. Criteria should also enable the different local circumstances to be taken into account. A clear JCS policy relating to development within villages would provide a criteria based approach to managing rural development and the basis for defining village boundaries should the local community or planning authority choose to do so.

How the main issues raised were addressed:

4.23 The feedback to the Issues consultation identified a number of key issues that would need to be fully considered when developing the preferred options for the JCS review. These can be summarised as:

- **The appropriate level/basis for Housing targets in North Northamptonshire;**
- **The need for enhanced broadband provision;**
- **Support for identifying Strategic Sites;**
- **The need to recognise the role of B8 in the JCS;**

- **The need for a positive economic strategy for the rural area;**
- **An enhanced role for Rushden;**
- **Consideration of a new village at Deenethorpe Airfield;**
- **More detailed settlement hierarchy in the rural area.**

4.24 It was clear that some issues were fundamental to the spatial strategy and distribution of development within it and would be developed by additional technical work where necessary and through the appraisal of spatial options as part of developing the preferred option.

Youth Conference

4.25 As part of the Place Shaping approach to the review, the JPU recognised that it was important that the priorities of young people, as a "hard to reach" group, were taken into account when producing the plan. It approached Groundwork North Northamptonshire to work in partnership and conduct a comprehensive consultation. Groundwork took the lead in the consultation, organising and delivering a youth conference and producing a film which highlighted the views of young people across North Northamptonshire.

4.26 The main consultation was conducted at a youth conference[8] event held on Wednesday 19th October 2011. Groundwork sought to encourage young people to actively participate in prioritising their needs and expectations in terms of North Northamptonshire's future. 65 young people participated in the youth conference.

What young work people said at the workshop:

- 64% would like outdoor facilities built or improved e.g. parks, skate parks, dirt tracks
- 55% would like to see improvements in their town centres, with more high street shops and more affordable places to eat
- 48% would like more entertainment that is also affordable
- 39% would like to see more job opportunities for young people
- 26% would like to see improved public transport
- 26% would like to see more youth provision and community cohesion
- 18% would like cleaner, safer, well lit streets
- 16% would like to see a continuation of young people involved in consultations

Key points from the youth conference

- Young people would like to see improvements made on sites and facilities that already exist, including their town centre and play parks;
- Young people would like more job opportunities;
- Young people feel that by improving public transport, it will also improve other aspects of their lives
- Young people would like outdoor facilities built, such as skate parks
- Young people would like affordable entertainment.

4.27 The above consultation and technical work helped in the consideration of reasonable alternatives to ensure that JCS represents the most appropriate strategy for the area. The starting point to considering alternatives was the adopted CSS, which took forward the requirements of the East Midlands Regional Plan and was based on an extensive evidence base and testing of alternatives. The approach taken to exploring alternatives

[8] http://www.nnjpu.org.uk/docs/Youth%20Conference%20Final%20Report.pdf

to the existing CSS has been to focus on strategic options rather than detailed policy wording variants.

4.28 For the overall spatial strategy, the four distinct spatial options that were developed through the Options development workshop (March 2010 Options workshop referred to paras 3.14 to 3.16), each had different implications for the roles of town centres, the distribution of new homes, jobs, infrastructure, and the location of strategic development sites. These options were assessed (as reported to the 8th September 2011 JPC[9]) against specific criteria informed by feedback from key stakeholders, notably infrastructure providers. From this assessment an emerging approach (or preferred option) was identified. The preferred option arising from the assessment of reasonable alternatives was a hybrid option, with the overall approach being most closely aligned to the 'Core Strategy Plus' option, but the distribution of housing weighted to the northern area as in the 'Northern Focus' option and greater self-reliance for employment in the southern area as in the 'Twin Poles' option.

4.29 Within the overall spatial strategy focus was also given to considering alternative approaches to the following strategic issues taking forward key issues identified through the work undertaken to date, which were also set out in a number of Background Papers:

- Settlement hierarchy
- Housing requirements
- Employment targets
- Retail Strategy
- Strategic Sites

4.30 The emerging spatial strategy arising from the assessment of alternatives was reported to JPC on the 24th November 2011[10]. This proposed continuing various elements of the current Core Spatial Strategy including:

- Delivery of strategic infrastructure, including aspects of the County Council's "Northamptonshire Arc" proposals;
- A priority for urban regeneration including implementation of town centre master plans/ Area Action Plans;
- The Green Infrastructure Framework, with a focus on the rivers Nene and Ise, Rockingham Forest and clear gaps between distinct urban areas reflecting key issues that were identified as an area of focus through Place Shaping Workshops and consultation;
- A concentration of development on the main towns, with Sustainable Urban Extensions providing a focus for mixed use developments.

4.31 However, it proposed changes and refinements including:

- Reduced targets for new homes and jobs, which remain aspirational but are more realistic and deliverable and better aligned with local aspirations;
- Recognition of distinct functional areas in northern and southern areas of North Northamptonshire, with Corby and Kettering accommodating most new development and strengthening their roles as a counter-point to Northampton;

[9] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2059/Committee/414/Default.aspx (Item 5)
[10] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2067/Committee/414/Default.aspx (Item 4)

- A greater role for Rushden in the southern area, recognising the size of the town and its potential to deliver growth, which had been identified consistently as a key issue through the review;
- Greater flexibility for some development in the rural areas to meet local needs and support a prosperous rural economy, where this is supported locally an important issue identified through consultation.

4.32 Although the meeting was not quorate, members gave feedback on the proposed strategy and policy approaches and the JPC on 12th January 2012[11] was able to agree a revised vision and outcomes for North Northamptonshire and endorse policy approaches on key issues such as settlement hierarchy and housing requirements.

4.33 The JPC on 26th April 2012 took stock of the emerging JCS in the light of the new National Planning Policy Framework (NPPF) and agreed a broad structure for the JCS and the approach to job targets as a basis for consultation.

4.34 It is clear that the development of the emerging approach was extensively informed by the consultation that had been undertaken to date. The key issues that had been identified, many of which had remained consistent from the commencement of the JCS review had been fully considered, with a number of key elements taken forward.

[11] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2070/Committee/414/Default.aspx

5. Emerging Plan consultation August – October 2012:

5.1 The Emerging JCS took forward the Emerging Spatial Strategy or preferred option referred to in para 4.28 based on the extensive work undertaken to date. It provided an opportunity to embed the 'Big Ideas' such as Rockingham Forest (Carbon Sink Forest), the Nene and the Ise Valleys and other key issues that had been identified throughout the JCS process to date into the Emerging JCS. The Place Shaping agenda was also embedded within policies 6 and 11 of this document recognising the distinctive characteristics of settlements that had been identified in the development of the JCS. A specific policy 14 also set out the proposed approach to the development of a new village at Deenethorpe Airfield which had been identified as an opportunity, notably through the Issues consultation. In relation to the rural area, in response to the work undertaken to date, which identified the rural settlement hierarchy as a key issue, the Emerging JCS identified a more detailed rural settlement hierarchy through the identification of Principal Villages, but did not identify a specific rural housing target in recognition of the localism agenda.

5.2 The document set out the overall vision for North Northamptonshire and the policies to deliver it and the structure of the JCS. The structure started with Core Policies applicable to all developments, then set out a spatial strategy (based on the network of settlements, transport connections, and the framework of green infrastructure). This was amplified through key policy areas relating to jobs, homes and infrastructure, followed by specific policies for strategic development sites and a section on monitoring and review. This structure was recognisable as an evolution of the current Core Spatial Strategy. The main changes, based on consultation feedback through the development of the JCS, and technical work included:

1. An initial set of Core Policies to protect the important assets including the internationally important Special Protection Area/ Ramsar designation along the River Nene (Northampton – Thrapston/ Thorpe Waterville) and policies to ensure high standards of design and sustainability within development;
2. Embedding urban design 'place-shaping' principles throughout the plan (building on the early Place Shaping work carried out with CABE referred to in section 3 of this document and the Urban Structures Study a technical study to take this forward);
3. Greater emphasis on encouraging economic prosperity, with a wider suite of policies including specific policies on Logistics and Rural Economic Development, reflecting that this was a significant issue for North Northamptonshire that had been frequently identified through consultation responses from all stakeholders;
4. Identifying and providing guidance on strategically important areas and key sites to focus attention on opportunities and investment and positive change, which was an issue that consultation responses during the early stages of the review highlighted should be included in the JCS;
5. Simplifying the structure of the plan so that topics such as housing and employment are addressed in a single section rather than split between sections on delivery and distribution as in the adopted CSS.

5.3 The report to the 3rd July 2012[12] Joint Planning Committee noted that the draft policies excluded Policy 12 which would deal with town centre and retail strategy, including the apportionment of retail floorspace requirements. This was complicated by the

[12] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2151/Committee/414/Default.aspx (Item 6)

submission of a planning application for a substantial out-of-town retail/leisure development at Rushden Lakes. As it was considered that the proposal could have significant implications for the spatial strategy it was not considered prudent to progress the JCS until the application was determined and the retail strategy resolved.

5.4 The Emerging JCS was also accompanied by a detailed report[13] setting out the rationale for the proposed policies and the reasonable alternatives that were considered in developing them alongside a number of detailed background papers, setting out the rationale for the approach set out, including how issues identified in the development of the JCS had been taken forward and refined. As set out in para 5.1, the Emerging Plan allowed a number of the issues and 'Big Ideas' that had been identified through the development of the JCS to be embedded into policy and be consulted upon and tested.

5.5 The Emerging Plan Paper was agreed by the Joint Committee on the 3rd July and was consulted on for 10 weeks from 6th August until 15th October 2012. The extended consultation period was considered necessary to ensure that stakeholders had sufficient opportunity to input into a consultation period that ran over the summer. As an informal consultation, late responses were included in the analysis.

5.6 The consultation was undertaken in accordance with the principles of the Participation Action Plan and incorporated the following:

- Notifying everyone on the JPU consultation database of the consultation, including those who had responded to the Issues Consultation;
- Distributing hard copies of the consultation document and summary leaflet to stakeholders who requested it;
- Information in the Northamptonshire Telegraph and on BBC Radio Northampton to ensure people knew about the consultation and how they could respond;
- Officers from the JPU attended a range of events and meetings with the partner authorities and other groups including Town and Rural Forums, Parish Councils, Landowners Group and the CPRE;
- Dialogue with adjoining authorities to ensure that the requirements of the Duty to Cooperate are satisfied in the development of the JCS

Issues raised through the Emerging Plan consultation:

5.7 In addition to feedback recorded at the meetings, over 1500 written responses were received to the consultation from 142 respondents. This included 24 responses from town and parish councils. The consultation responses to the Emerging Plan were reported to the 29th November 2012 JPC[14].

5.8 The key headlines from the consultation feedback were:

Draft Vision & Outcomes

- Broad support for thrust of Vision and Outcomes, including locally specific visions for each district although East Northamptonshire Council considered the review should include a more localised vision for East Northamptonshire;

[13] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2151/Committee/414/Default.aspx (Item 6- Appendix 2)
[14] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2183/Committee/414/Default.aspx (Item 5)

- A number of responses sought amendments to reflect specific interests.

Additional areas

- Some criticism about the partially complete consultation document, and that stakeholders couldn't comment on the supporting text;
- The Development Industry raised a number of issues relating to viability particularly in relation to the environmental and sustainability standards identified in the Plan and affordable housing provision. They considered the package of policy requirements and standards would make the Plan unviable and were critical that the policies had been developed in advance of a viability assessment

Core Policies

Protecting and enhancing assets; Draft Policies 1-5

- Broad support for the protecting assets policies, particularly from environmental stakeholders and Parish Councils and for the location of these policies at the start of the plan. However, Northamptonshire County Council considered that the structure should be re-considered to emphasise North Northamptonshire as a growth area;

- English Heritage and the National Trust supported policies 1-4.

- A Range of policy amendment/ refinements were suggested to improve clarity/ assist implementation;

- Some concern from the Development Industry that Draft Policy 4 *Water Environment & Flood Risk Management* would constitute a financial levy on development and should be dealt with by the Community Infrastructure Levy (CIL).

Ensuring high quality development; Draft Policies 6-9

- Responses supported the principle of Draft Policy 6 *Designing Sustainable Places* but sought clarification over issues such as the realism of the policy (encouraging non-car modes), terminology, scope and implementation;

- Principle of promoting construction of sustainable buildings in Draft Policy 7 *Sustainable Buildings* was supported but the development industry raised a number of concerns relating to viability;

- The Development Industry did not think that the standards in Policy 7 should be higher than those set out in Building Regulations;

- Similar concerns were raised by the Development Industry in relation to Policy 8 *Allowable Solutions* but Prologis fully supported this Policy;

- Strong support from Parish Councils, local residents and partner Local Planning Authorities to Draft Policy 9 *Provision of Infrastructure*.

Spatial Strategy

The network of Urban & Rural Areas; Draft Policies 10-14

- Broad support for spatial strategy of the Plan set out in Draft Policy 10 *Network of Urban & Rural Areas* but development industry suggested refinement, linked to representations seeking higher housing figures;

- Higham Ferrers Town Council raised concerns over the identification of Rushden as a Growth Town and wanted to be involved in future discussions regarding its development;

- Some questioning of the justification for identifying Rushden as a Growth Town;

- Some concern from partner Local Planning Authorities and Parish Councils about implications of identifying villages as Principal Villages, and that identification would increase development pressure on these settlements;

- The Principles underpinning Draft Policy 11 *Settlement Design Principles* were supported, notably by OPUN but a number of responses identified criteria that should be amended to aid clarity and implementation.

- Some duplication was identified between Draft Policy 6 and 11 which could be reduced;

- One response stated that the policy 14 (Deenethorpe Airfield Area of Opportunity) should be broadened to allow for wider consideration of new settlements taking forward Garden City Principles. However, most responses from the development industry questioned the justification for the site being identified, and argued that more sustainable alternatives should be considered such as focusing on market towns in ENC where existing infrastructure exists;

- Parish Councils including Deene and Deenethorpe and Weldon Parish Councils objected to Policy 14, and the CPRE and Kettering Borough Council raise concerns about the Policy/proposal.

Connections within and beyond North Northamptonshire; Draft Policies 15-18

- Northamptonshire County Council suggested a range of amendments to Draft Policy 15 *Well Connected Towns, Villages and Neighbourhoods* and questioned whether criteria c) which suggests a 20 mph design speed on 'residential roads' is deliverable in current economic conditions;

- A number of cross boundary issues were identified, particularly in relation to transport infrastructure. This was recognised as an important issue to satisfy the Duty to Cooperate;

- The partner Local Planning Authorities supported Draft Policy 17 *Connecting North Northamptonshire with surrounding areas*, although identified a range of local priorities which should be given further consideration;

- Both Northamptonshire County Council and the Highways Agency suggested amendments to Draft Policy 17;

- The Highways Agency stated that there are no current proposals to undertake a major improvement of the A14 between Stanwick and Thrapston and it would be inappropriate to include reference to this within Policy 17 or on the Key Diagram. In contrast, East Northamptonshire Council considered that the policy should be more strongly worded in support of this proposal;

- Draft Policy 18 *HGV Parking* was supported by a number of respondents including the Highways Agency and Northamptonshire Police.

The Green and Blue Infrastructure Framework; Draft Policies 19-21

- Environmental stakeholders and the West Northamptonshire Joint Planning Unit supported Policy 19 *The Delivery of Green Infrastructure* and suggested amendments to aid implementation;

- Draft Policy 20 *Nene and Ise Valleys* and 21 *Rockingham Forest* identifying special policy areas was supported. Some concern was raised by the development industry that Draft Policy 21 was a further policy that was reliant on developer contributions, and these costs should be taken into account in the Viability Assessment.

Delivering Economic Prosperity; Draft Policies 22-27

- Respondents including the partner Local Planning Authorities supported the approach to delivering economic prosperity although the West Northamptonshire Joint Planning Unit sought clarification of the relationship between jobs and homes;

- Broad support for recognising the importance of Strategic Distribution in Draft Policy 24, notably from Prologis. Further justification was sought for the 70% limit on B8 floorspace cited in the Policy;

- The general emphasis within Draft Policy 25 *Rural Economic Development and Diversification* was welcomed, although a number of rural landowners and the National Farmers Union expressed concern about the detail of the policy and its implications considering that the policy imposes restrictions on development in the rural area;

- The CPRE raised a number of amendments to strengthen Draft Policy 26 *Renewable Energy* and stated their opposition to planning gain being used in connection with renewable energy development.

Delivering Homes; Draft Policies 28-31

- The Development Industry did not consider that the housing numbers set out in Draft Policy 28 *Housing Requirements & Strategic Opportunities* had been objectively assessed and raise strong objections;

- They considered that the Joint Core Strategy (JCS) should take forward Regional Plan Housing figures;

- The JCS should provide additional housing at Market Towns and Principal Villages/rural area due to viability issues with Sustainable Urban Extensions (SUEs);

- Promoters of Kettering East and Wellingborough East considered that additional land at these sites should be identified as the SUEs will be delivered before the end of the Plan period;

- Criticism from the Development Industry that the Emerging Plan does not include a rural housing target;

- The Development industry considered that housing targets for Wellingborough and East Northamptonshire are too low;

- The Duchy of Lancaster objected that only land East of the A6 at Rushden is identified as a potential SUE within Draft Policy 29 *Distribution of New Homes*. Rushden/ Higham Ferrers should be planned as functional area with a broader Area of Search for the SUE.

- Some responses from the Development Industry raised concern that Draft Policy 30 *Housing Mix and Tenure* seeks to limit the amount of larger dwellings, which will prevent those who need larger homes from accessing them at an affordable price.

- Concern was also expressed in some responses from the Development Industry that the affordable housing policy has been developed in advance of the completion of viability testing.

Delivering Infrastructure & Services; Draft Policy 32

- Some respondents from the Development Industry expressed concern that as the JPU has been working on CIL, it is reasonable to expect that this policy would have more substance at this stage;

- The Highways Agency wished to continue its engagement with the JPU in order to assist in the development of the Infrastructure Schedule that is expected to be included in the Pre Submission Draft Plan.

Strategic Sites

- A number of site specific responses were received. Developers whose sites had not been identified submitted detailed information to review the site assessment scores. They suggest that additional sites should be included in the JCS (linked to additional housing requirements sought by developers);

- A number of Strategic Sites were promoted, including detailed site assessment information.

Sustainability Appraisal

- The Interim Sustainability Appraisal had identified areas of the Plan which could be strengthened to improve sustainability. These will be fully considered in the development of the Pre Submission JCS.

How the main issues raised were addressed:

5.9 The consultation on the Emerging Plan was particularly useful in obtaining feedback from stakeholders and testing policies and key elements of the spatial strategy while the plan was at an informal stage and there was flexibility to make significant changes if these were considered necessary.

5.10 This consultation identified areas where further work was needed to inform the preparation of the pre-submission plan and areas such as policy wording which could be refined and clarified. Feedback was also useful in identifying the issues that needed to be addressed in policy supporting text. The ongoing technical work to support the development of the JCS, notably viability assessment was considered to address a key area of objections.

5.11 Alongside the consultation response to the Emerging Plan, at the 29th November 2012 JPC, a separate report[15] updated the JPC on the further work that was required to progress the JCS including those arising from the consultation feedback. It was recognised that the response to the Emerging JCS underlined the importance of completing technical studies and appraisals to inform the final JCS. The consultation response also highlighted particular policy areas where further consideration and work was required to justify or refine the approaches proposed in the emerging JCS. Key areas of work included:

- Reviewing housing requirements to ensure that they could be justified based on the "objectively assessed need" in North Northamptonshire (Policies 28, 29)
- Revisiting the Settlement Hierarchy, particularly the evidence for, and implications of, identifying "Principal Villages" and the justification for the Deenethorpe Airfield Policy (Policies 10, 14);
- Considering whether it was necessary to include rural housing targets in the JCS to provide strategic guidance for site specific/ neighbourhood plans (Policy 29);
- Developing affordable housing targets and thresholds taking account of objectively assessed needs and viability issues (Policy 30);
- Identifying the sectoral split of employment targets and any implications for the identification of strategic sites/ site development principles (Policies 22, 23);
- Developing proposals in relation to "Allowable Solutions" (Policy 8)
- Review of detailed policy wording and the preparation of supporting text;

5.12 A separate report[16] to this JPC provided an update on the assessment of strategic sites including the location of additional sites promoted through the Emerging JCS, representations received to the Emerging JCS, and the work needed to address these.

[15] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2183/Committee/414/Default.aspx (Item 7)
[16] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2183/Committee/414/Default.aspx (Item 5)

5.13 The 31st January 2013 JPC[17] updated the Joint Committee on the progress of the JCS following the Emerging Plan consultation, and agreed ways forward in relation to a number of issues, which included setting out the JPU's response to relevant issues raised in the Emerging Plan consultation.

a) The Vision for North Northamptonshire;

The JPC agreed an amended Vision and endorsed the response to other representations on the vision.

b) The role of Rushden:
- Should Rushden be identified as Growth Town?
- Should Rushden/Higham Ferrers be treated as one area?

The JPC agreed to retain Rushden as a Growth Town and Higham Ferrers as a separate Market Town in the settlement hierarchy and give further consideration to the location of growth at Rushden once further site assessment work was completed.

c) The justification for the Deenethorpe Airfield Policy

The JPC agreed to maintain the emerging JCS approach to Deenethorpe Airfield Area of Opportunity, subject to the promoter providing more information to illustrate why the proposal remains a unique long term opportunity and to demonstrate the viability of the scheme and its proposed scale with the required standards of infrastructure. Further work should also be undertaken to address the concerns raised by infrastructure providers, local parish councils and Corby Borough Council. The JPC also agreed that Policy 14 should be made more locally specific and exacting.

5.14 A separate report to the 31st January 2013 JPC[18] reviewed the approach to housing requirements in the light of the issues raised to the Emerging Plan consultation. This report set out a detailed response to the issues raised in the Emerging Plan consultation, alongside considering further evidence and work undertaken by the JPU.

5.15 The JPC agreed that the 'objectively assessed needs' of the North Northamptonshire Housing Market Area should be identified as between 30,000 and 40,000 new dwellings over the period 2011 to 2031, dependent on the strength of market demand to support the delivery of the Strategic Urban Extensions;

[17] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2182/Committee/414/Default.aspx (Item 4)
[18] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2182/Committee/414/Default.aspx (Item 6)

6. Interim Consultation August – October 2013

6.1 As referred to in para 5.3 the Rushden Lakes proposal impacted upon the timetable for progressing the JCS. The application was 'called in' for determination by the Secretary of State in December 2012. The Joint Committee on the 14th March 2013[19] agreed that the formal progress of the review of the Joint Core Strategy (JCS) must be paused pending the Secretary of State's decision on Rushden Lakes. This obviously impacted on the timescale for progressing the JCS to pre submission stage and taking forward the key issues and work identified through consultation feedback to the Emerging JCS.

6.2 In view of the delay to the JCS review, on the 25th July 2013,[20] the Joint Committee agreed to carry out interim consultation on a number of matters.

a. Interim Housing Policy Statement

The Interim Housing Policy to introduce up-to-date information on objectively assessed housing requirements as a material consideration in planning decisions. It does not change the adopted Core Spatial Strategy (including the distribution of development) as this is a matter for a review of the JCS.

b. Development principles for proposed strategic sites and updated Strategic Sites Background Paper

The consultation on the emerging strategic site development principles and updated Background Paper taking account of responses made to the Emerging JCS would allow local issues and further representations from development interests to be considered before the list of sites and distribution of development in the pre submission plan was finalised.

c. Proposed sustainable urban extension at Rushden East

Consultation was undertaken on a broad location for the SUE and issues to be addressed in taking the proposal forward. It was recognised that the allocation of land and detailed site development principles would be taken forward through a site specific development plan.

d. Statement of Community Involvement

e. Urban Structure Study

The USS provides an important evidence base in considering how the towns could change for the better in terms of movement and connectivity. It had already informed the assessment of spatial options and the development of policies in the emerging JCS.

6.3 These matters were not considered to be reliant upon, or prejudicial to, the decision on Rushden Lakes. Consultation would allow progress to be made on a range of policy issues and it was considered that this additional consultation should enable the Joint

[19] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2184/Committee/414/Default.aspx (Item 4)
[20] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2317/Committee/414/Default.aspx (Item 4)

Committee to move as quickly as possible to complete the JCS review when the Secretary of State's decision on Rushden Lakes was available.

6.4 The consultation was supported by a number of detailed Background Papers, which set out how these relevant issues had been progressed in the light of consultation feedback and ongoing technical work. The Strategic Sites Background Paper was updated following consultation responses to the Emerging Plan, and new sites that were promoted through this consultation were assessed. The consultation was undertaken for 8 weeks from 12th August to 7th October 2013.

6.5 Consultation incorporated the following measures:

- Notifying relevant stakeholders from the JPU consultation database of the consultation, including those who had responded to the consultation during the development of the emerging plan to date;
- Articles on District Council websites;
- Distributing hard copies of the consultation document to stakeholders who requested it;
- A press release resulting in information in the Northamptonshire Telegraph to ensure people knew about the consultation and how to respond;
- Placing site notices at a number of the strategic sites referred to in the consultation document on Strategic Housing and Employment sites together with notification letters to landowners and immediately affected properties where site boundaries had been identified;
- Officers from the JPU attending a range of events and meeting with the Partner Councils

Issues raised through Interim Consultation

6.6 The consultation responses were reported to the 14th November 2013 JPC[21].

6.7 Over 1400 individual comments were received to the consultation from 97 respondents. A schedule of responses was published on the JPU web site: www.nnjpu.org.uk and a full set of consultation responses was available for inspection on request.

6.8 The most significant level of response to the consultation was received in relation to the Interim Housing Policy Statement and consultation on Strategic Housing and Employment sites, which as expected, included a strong representation from the development industry.

Interim Housing (Policy) Statement

6.9 Responses were received from 48 organisations and individuals to the Interim Housing Statement (IHS) with over 460 individual comments. These respondents included local authorities within and adjoining North Northamptonshire, Town and Parish Councils, Neighbourhood Planning Groups, housebuilders, developers and land agents (development industry). Key issues raised are set out below and were apportioned to the themes of 'Process' and 'Methodology'.

[21] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2328/Committee/414/Default.aspx (Item 4)

Process

Weight of Interim Housing Statements in case law

6.10 A number of respondents highlighted recent appeal decisions where Inspectors had given little weight to interim housing documents as these do not constitute part of the Development Plan and are based on housing figures which have not been subject to independent examination. A number of respondents therefore considered that the IHPS should, and would, be given no weight in appeal decisions.

Lack of formal scrutiny/testing

6.11 Similarly, the majority of responses from the development industry highlighted that the IHPS is not a statutory document and has not been subject to Sustainability Appraisal, Strategic Environmental Assessment or formal independent examination and it is therefore considered unlawful, constituting the introduction of policy through the 'back door'.

Evidence of the Duty to Cooperate

6.12 Concerns were raised by the development industry that in producing revised housing numbers the NNJPU had worked independently without consideration of the consequences that reducing the number of dwellings will have on neighbouring authorities. The development industry therefore considered that the NNJPU was unable to demonstrate compliance with the Duty to Cooperate. Responses from Harborough District Council and Bedford Borough Council raised potential concerns about the development of the IHPS, although West Northamptonshire JPU had no objections to the document.

Methodology

Methodology for calculating objectively assessed housing requirements (Part A of IHPS)

6.13 There was much support from the development industry to the continued use of the Core Strategy targets as the basis against which housing land supply is to be assessed. This was based on the Inspector's report into a recent appeal at Irchester, which outlined that as the Draft JCS was emerging at the time of the appeal, and at an early stage of its development, it was considered that the assessment of five year land supply should be calculated against the requirements of the adopted Core Spatial Strategy.

6.14 Persimmon Homes Midlands, the Home Building Federation and Harborough District Council considered that the approach used, making use of the latest (April 2013) CLG Household Projections within the IHPS was an appropriate starting point for assessing housing requirements. However, following the start of the consultation the Government published draft *National Planning Policy Guidance* which, although acknowledging ONS/CLG projections as the starting point for an estimate of overall housing need suggests that plan makers may consider sensitivity testing of factors including an allowance for past under delivery of housing, market signals and employment trends. Representations emphasised that the 2011- based projections are trend-based, reflecting a period impacted by the economic downturn which suppressed household formation and these do not fully reflect future migration patterns, market demand or economic factors.

6.15 A number of respondents considered that the IHPS makes no use of the 2012 Strategic Housing Market Assessment (SHMA) in assessing housing needs and the approach taken within is subsequently contrary to para 159 of the NPPF. On this basis it is considered the targets within the IHPS do not represent the full and objectively assessed needs for the area.

6.16 It was also suggested that the 'Migration-led recalibrated plus backlog' scenario tested in the 2012 SHMA was a realistic and robust basis upon which to base North Northamptonshire's objectively assessed housing requirement as this takes into account local data and evidence combined with official ONS statistics.

6.17 The development industry argued that given past levels of housing delivery, a 20% buffer should be applied to all local authority areas, rather than just to Corby and Wellingborough.

6.18 A key area highlighted through the consultation related to the treatment of 'undersupply' of housing completions relative to the objectively assessed requirement. Generally, two approaches are used when assessing undersupply: 'Liverpool' and 'Sedgefield'. The former approach distributes any undersupply (relative to requirements at a point in time) over the remainder of the plan period, with annual requirements recalculated on this basis. The latter approach distributes this undersupply over the five years in which the assessment is made (in the case of the IHPS, this is 2014-19).

6.19 On the basis of recent appeal decisions and the recently published National Planning Policy Guidance (published in draft after the IHPS consultation started), which developers considered emphasises to use of the Sedgefield approach[22], considerable feedback was received advising that the Sedgefield approach should be used in the treatment of 'undersupply' relative to plan targets.

6.20 Concerns were also raised in relation to the approach of reapportioning the revised housing requirements on the basis of the adopted core strategy as it was suggested these would not meet the identified local need within a local planning authority area if these are reapportioned elsewhere.

Components of Housing supply (Part B of the IHPS)

6.21 Concerns were raised by respondents as to the evidence justifying some of the components of housing supply listed by local authorities in the Part B site schedules. In particular, given the advice NPPF para 47 (footnote 11) representations challenged the inclusion of sites without the benefit of planning permission.

6.22 Concerns were raised that the site trajectories in Part B of the IHPS made no provision for the non-implementation of some existing planning consents. A number of respondents suggested a 10% discount be applied to all extant permissions and cited this as best practice as identified through appeal decisions.

6.23 A number of respondents considered that the phasing assumptions used in local authority trajectories are over-optimistic as to the levels of development which will occur between 2014-2019, notably in relation to the Sustainable Urban Extensions.

[22] NPPG (2013) *Assessment of Land Availability: Stage 5 Final Evidence Base – How should local planning authorities deal with past under supply*? [Online] Available from: http://planningguidance.planningportal.gov.uk/blog/guidance/assessment-of-land-availability/stage-5-final-evidence-base/

Additional Sites

6.24 Through the consultation a number of new sites were put forward to be considered for future housing development. The districts assessed these to gauge their appropriateness and deliverability with a view to their potential inclusion in assessments of housing land supply going forward.

Areas for further work

6.25 Consultation on the IHPS identified the areas where further work and consideration was required before the document could be agreed. It also highlighted issues to address in finalising the objectively assessed housing requirements to be met in the JCS. This allowed the JPU to undertake the further work to ensure that the pre submission JCS is as robust as possible.

6.26 The JPU would commission updated demographic modelling work to help to confirm the objectively assessed housing requirement for the Housing Market Area in the light of the issues raised in the consultation. Similarly, the approach set out in the IHPS would be updated in relation to the requirements set out in the draft National Planning Practice Guidance which was published after consultation commenced. This would include utilising up-to-date employment forecasts to review the economic basis for housing requirements.

6.27 The JPU would seek further legal advice in relation to responses questioning the lawfulness of the IHPS.

6.28 Further dialogue would be undertaken with adjoining authorities in relation to issues that have been raised in response to the IHPS in relation to the Duty to Cooperate. This dialogue would be on going through the preparation of the pre-submission plan to ensure that the requirements of the Duty to Cooperate are satisfied.

6.29 The District Councils would revisit rates of housing delivery in light of responses, particularly from developers of sites that are identified in trajectories, and where different assumptions exist. The Districts will also assess the additional sites that were promoted through the consultation in relation to Part B of the IHPS.

6.30 The JPU set out that it would report its detailed response to the issues raised through the consultation including an updated assessment of the objectively assessed housing requirement, and five year housing supply position, to the Joint Planning Committee on 9th January 2014, with a view to agreeing Part A of the IHPS.

Consultation on Strategic Housing and Employment Sites

6.31 There was a significant response to this consultation document with over 50 respondents making over 750 individual comments. The responses from the development industry were largely linked to whether their land interests had been identified as strategic sites. There were a number of particularly useful responses from statutory agencies in relation to the potential impacts of strategic sites, infrastructure requirements and other constraints including a helpful analysis of sites from the Highways Agency, Northamptonshire County Council, the Environment Agency and Natural England.

Methodology for assessing strategic sites

6.32 The methodology for assessing strategic sites was broadly supported by statutory agencies, the partner local planning authorities and Northamptonshire County Council Highways (NCC). Natural England were satisfied that the methodology used to assess the potential development sites was satisfactory and that the report was comprehensive. It noted the use of the Environmental Sensitivity consolidation which provides an assessment of landscape, biodiversity and cultural heritage which generally covers its interests in the natural environment. English Heritage set out that that the updated Background Paper provided a reasonable methodology for assessing the heritage issues for specific sites. The Environment Agency considered that the assessment criteria in Appendix 4 of the Background Paper does not emphasise the importance of identifying potential risks posed by land affected by contamination.

6.33 Both Kettering Borough Council and East Northamptonshire Council supported the methodology for assessing strategic sites. However, they both considered that a conclusion should be added to the individual site assessments to provide greater clarity as to how sites have been selected, in order to clearly demonstrate that the methodology has been consistently and methodically applied. This conclusion should set out how the positive and negative factors have been considered and whether the site is considered suitable for further consideration as an allocation in the JCS within the current plan period. The need for a clearer conclusion as to why sites have been identified was also referenced in a number of responses from the development industry.

6.34 A number of responses from the development industry, particularly those whose sites were identified as potential strategic sites considered that the methodology and process for assessing sites was broadly appropriate. As expected, developers whose sites had not been identified criticised the process and methodology and expressed concern that the site assessment and scoring hasn't reflected evidence that they have provided. The majority of responses from developers did emphasise the importance of ensuring that there is consistency between the assessments for each site.

6.35 The issue of weighting of the site assessment criterion was referred to by the development industry. Hallam Land Management set out that whilst the updated background paper recognises that different indicators are not directly comparable, the document should clearly state that some of the indicators are more important than others for considering the strategic sites in the JCS.

6.36 Gretton Brook Estates and Hampton Brook whose sites Brookfield Plantation, Corby and Prospect Park, Wellingborough have not been identified in the emerging JCS strongly criticised the site assessment process raising similar concerns. Gretton Brook Estate considered that it was not clear throughout each of the consultation documents as to how much weight is to be provided to each of the criteria within the sustainability matrix during the selection of sites process, which would therefore indicate that the selection of sites is purely subjective and not reliant on the outcome of each site assessment. Similarly, Hampton Brook raised significant concerns about the interpretation of site assessment criteria in the light of available evidence as submitted to the NNJPU as part of previous consultation exercises. Whilst noting and welcoming a number of revisions and rescoring of some sites, it considered that the 'traffic light' summary, still, in some instances, failed to demonstrate a consistent approach to the categorisation of different sites. As such they called into question the objectivity of the assessment as a rigorous assessment on which comparative scoring can be properly based.

6.37 A number of responses from the development industry also considered that the site assessments should be treated with caution, given the scorings do not consider any proposed or agreed measures to mitigate the potential impacts identified. Boughton Estate and Buccleuch Property set out that that the assessment should take account of all information, be based on robust evidence and recognise mitigation measures that sites can provide to deal with potential areas of concern. Gretton Brook Estates and Hampton Brook raised similar concerns.

6.38 Responses from some developers including Aberdeen Asset Management and Gladman Developments considered that the JCS review and strategic site assessment process had not considered alternatives to the settlement hierarchy in discounting sites at Sywell and Burton Latimer respectively. Similarly, NNDC state that given the dependence of the large sites strategy on significant infrastructure provision for which there is no evidence of funding provision, they remain concerned as to why alternative strategies for housing growth and delivery have not been evaluated, for example greater provision for the small-scale marginal growth of minor settlements which could strengthen the viability of villages and village services.

Appropriateness of the traffic light scores in the updated Background Paper

6.39 A detailed response was received from key stakeholders providing additional information to update the traffic light scores in the updated Strategic Sites Background Paper. A significant number of responses from the development industry provided additional information in relation to the traffic light scoring system for sites. These responses largely sought to improve the scores assigned to specific sites that a developer was promoting. In some instances, responses considered that scoring of sites other than their own should be downgraded, due to constraints being incorrectly assessed.

Appropriateness of the listed strategic sites

6.40 There was a limited response from local residents to the proposed strategic sites, despite the publicity detailed in para 6.5. The Borough Council of Wellingborough supported the approach in the emerging Joint Core Strategy to not identify any further strategic housing and employment sites within Wellingborough beyond those already committed. A number of responses from the development industry promoted alternative strategic sites for inclusion in the JCS and provided further evidence to support their inclusion. The majority of these responses are related to sites that have previously been assessed in the strategic sites Background Paper although some new strategic sites have been promoted.

6.41 It was recognised that a number of these new sites were of particular strategic significance and it was therefore important to bring to the JPC's attention (and these sites were specifically referenced in the JPC report, and identified on a map as an appendix to this report). A site known as 'Roundhill Park' is being promoted by UK Strategic Land ltd and relates specifically to the north-eastern portion (153.8 ha) of a larger proposed SUE to Northampton, therefore crossing the boundaries of West and North Northamptonshire (within Wellingborough district) The promoters stated that Roundhill Park will include a new hospital, new employment land, aimed primarily at warehouse and distribution uses, but also accommodating other uses within the B1-B2 Use Classes and a new transport hub including park and ride. They set out that the site is one of the most strategically positioned sites within the West Northamptonshire/North Northamptonshire area, aligned with the County Council's strategic growth and infrastructure corridor along the A43 between Northampton and Kettering and would be a suitable opportunity for North Northamptonshire JPU to co-

ordinate with the requirements of West Northamptonshire and to address in a sustainable manner the needs of West Northamptonshire.

6.42 Further information and detail was also received in relation to the Kettering South site (site 43 in the Strategic Sites Background Paper) and the potential boundary of the site. The promoters of the Kettering South site consider that the site has the capability to provide up to 2.2 million square feet of logistics and industrial (B2 and B8) employment space within a high quality landscaped master planned development with the creation of up to 3,000 jobs.

6.43 Knights of Old considered that both the Kettering South site and Roundhill Park would help it to expand and consolidate its logistics business and retain its role as a key local employer.

6.44 First Renewables sought the identification of land at Burton Wold wind farm (ref 085) as an area of opportunity for renewable energy generation and related uses. They consider that the proposed Kettering Energy Park, located on the Burton Wold site, will provide an integrated, renewable low carbon, decentralised energy source which is able to secure the future sustainable energy supply for Kettering Borough and North Northamptonshire. First Renewable stated that the park will build on the existing renewable energy and food production usage of the land and introduce a number of other renewable and low carbon energy generation technologies and associated users.

Key principles and policy for relevant strategic sites

6.45 Responses to this element of the consultation identified a number of amendments to the draft policies and development principles. Input from English Heritage, Natural England and NCC Highways provided particularly useful information that would inform the refinement of the development principles in the pre-submission plan. English Heritage provided detailed comments in relation to the policies and development principles for Kettering North and West Corby.

6.46 Significant issues were raised in relation to the West Corby SUE, particularly relating to connectivity issues and the site boundary. Corby Borough Council noted that the A6003 acts as a major barrier to east-west movement between the urban extension and Corby, particularly for pedestrians and cyclists and supports the requirement for a strategy to be agreed and implemented to ensure that West Corby is well-connected to areas of neighbouring development and to the town centre. However, pending completion of a detailed transport assessment, the Council objected to the place shaping requirements that seem to support the downgrading of the A6003 to enhance connectivity within Corby. Proposals to improve connectivity between the urban extension and Corby should await the conclusions of the detailed Transport Assessment which will allow the transport implications of proposed developments to be properly considered.

6.47 Great Oakley Estate and Rockingham Castle Estate, landowners of the West Corby SUE identified in the consultation, stated that they have developed a strategy to enhance connectivity to the SUE and would welcome feedback from the JPU on this.

6.48 The boundary of the West Corby SUE, which was agreed at the 31st January 2013 JPC remained a contentious issue. The promoters of land between the identified SUE boundary and the A427 Harborough Road considered that their land should be included in the allocation for the SUE. They set out that the site assessment in the strategic sites background paper post-dated the decision of the Joint Planning

Committee to exclude their land from the West Corby SUE. This disparity raises serious concerns regarding the objectivity and consistency of the assessment process. It could be inferred that the assessment has been retro-fitted to suit the chosen option rather than being used objectively to inform key decisions about what is the preferable and most appropriate.

6.49 Corby Borough Council also suggested that the West Corby allocation should include land to the south of the A427 to enable comprehensive planning of the development and allow for flexibility for the development and the inclusion of potential access points within the site boundary.

6.50 Berry Bros recommended that the boundary of the SUE should be reshaped to include land to the South West of the site, as a combination of the identified SUE and this land would provide a coherent and well related settlement extension to the town.

Sustainable Urban Extension (SUE) to the East of Rushden

6.51 The landowners and promoters of the Rushden East SUE supported the proposed broad location, which was strongly supported by East Northamptonshire Council. Further support was received from Higham Ferrers and Rushden Town Councils and Irchester Parish Council. Higham Ferrers Town Council stated that in order to maintain the separate identity of the two towns the Council would want to see a substantial green infrastructure separation along the boundary. This could include a cemetery and allotments, which is infrastructure that is lacking in Higham Ferrers as well as additional recreational space. The Town Council also requested involvement alongside Rushden Town Council in master planning of the development. Higham Ferrers Town Council raised concerns relating to the impact on highways infrastructure, notably Chowns Mill roundabout which needs to be upgraded before development commences; and the connectivity between the new development and the existing built up areas as the A6 forms a significant barrier.

6.52 AFC Rushden and Diamonds set out that they have searched extensively for alternative sites for a new football club within the existing area but believed that the acquisition of the approximately 25 acres required is unlikely to be available other than being within the proposed Rushden East expansion. The club seek to be a focus for recreation and community growth and are keen to provide further details of its vision.

6.53 The Duchy of Lancaster continued to object to the broad location of the SUE .The Duchy's view remains that there is a lack of physical evidence underpinning the identification of this site (particularly in the physical and master planning terms) and that the core strategy review should identify a direction of growth east of Rushden/ Higham Ferrers. The planning proposals appear to have been defined so that this growth only takes place within the administrative areas of Rushden which is not an appropriate basis for the comprehensive physical planning of a major development area. The landowners of land known as Slater's Lodge, Newton Road consider that this land (ref 080) should form part of the proposed SUE.

6.54 Newton Bromswold Parish objected to any proposed expansion of Rushden beyond the east of the A6 Higham Ferrers/Rushden Bypass citing a range of issues including infrastructure capacity, traffic, visual impact and the difficulty crossing the A6 to access the site. The Parish Council considered that the proposed extension of Rushden and Higham to the east is seen as the easy option and that additional consideration should be given to alternative solutions/ proposals that are available that would enable the town of Rushden to remain a cohesive unit. Similarly, Chelveston-cum-Caldecott Parish Council continued to object to the potential SUE. They stated that if the NNJPU

is minded to include the Rushden East SUE strong policies should be included in preventing the SUE from coalescing into the surrounding villages and hamlets and also that the development of the SUE would trigger a requirement for substantial traffic calming measures on the connecting routes at the villages and hamlets.

6.55 A number of concerns were raised about the sustainability of the potential Rushden East SUE including accessing existing facilities, concerns about connectivity across the A6 and transport sustainability.

6.56 NCC Highways recognised that the A6 bypass creates a physical barrier between the SUE and Rushden town centre and means that gaining east-west connections with Rushden town centre on foot and by cycle will be challenging. The A6 bypass is part of the principal road network and as such has high traffic flows and is designed for speeds of 60 mph and 70 mph with few access points along it. In order to improve connectivity to create a sustainable development, the character of the road would need to change and as yet, the implications of this impact on the surrounding highway network are untested. It is anticipated that, for example, reducing speeds would result in a less attractive bypass resulting in more traffic in the town centre which would create increased pressure on the town centre network.

6.57 NCC Highways also had serious concerns from a transport perspective regarding the potential impacts on the A6 and A45. Initial modelling work has shown that development will increase traffic flows and congestion on the A6 and A45, particularly at the Chowns Mill junction and along the rest of the A45 corridor which is already at capacity. The SUE is reliant on a workable solution being found at Chowns Mill. NCC set out that it wishes to work with the Highways Agency to develop a scheme solution that can be tested in further detail, and welcomes the JPU's approach to develop a site-specific development plan document to identify the infrastructure requirements of the SUE.

Further work required

6.58 The response to the consultation on strategic housing and employment sites was a very useful exercise in identifying issues that needed to be addressed and the scope for further work to be undertaken by the JPU and the district councils to prepare the Pre-Submission JCS.

6.59 It was recognised that a detailed analysis of responses, particularly in relation to the assessments of individual sites would need to be undertaken to assess whether the traffic light scores for sites should be amended and whether additional strategic sites should be included in the Pre-Submission JCS. The input received from statutory agencies provided up-to-date evidence of constraints and issues to inform this process. Input from the partner Local Planning authorities would be a key part of this process. Where necessary, further dialogue with the site promoters would also be undertaken. The new strategic sites that have been promoted through the consultation will be assessed using the same methodology set out in the Strategic Sites Background Paper.

6.60 It was considered that further clarity could be provided in the Strategic Sites Background Paper as to why sites have been identified as strategic sites, and to recognise that some constraints are more significant than others.

6.61 The development principles for potential strategic sites would be reviewed and refined in the light of responses received. Where necessary, further dialogue would be

undertaken with relevant stakeholders and the site promoters to inform this process and to address issues raised in consultation responses.

6.62 It was evident that issues relating to connectivity and crossing major roads remained a key issue in relation to potential strategic sites, notably the SUEs West of Corby and the broad location identified East of Rushden. The JPU would undertake further dialogue and work with NCC Highways, the Highways Agency and the site promoters to ensure that the approach set out in the Pre- Submission JCS recognises the critical importance of connectivity and accessing sites in a sustainable way, whilst recognising the role that roads such as the A6 and A6003 play.

6.63 It was recognised that further work would need to be undertaken in relation to the SUE at Rushden, particularly in relation to highways and infrastructure capacity. It would also be necessary to revisit the evidence base that exists in relation to the potential directions of growth around Rushden to ensure that the issues raised in responses are fully addressed.

6.64 As reported to the 25th July 2013 JPC, it was recognised that it would be necessary to review the list of strategic sites when the distribution of development in the JCS is confirmed in the pre submission plan. Furthermore, should any sites be granted planning permission in the intervening period they would be included as commitments, which may affect the analysis of land supply.

How key issues were addressed:

6.65 It was considered that the interim consultation was a very valuable exercise which tested the proposed IHPS and allowed extensive progress to be made on a range of policy issues that would enable the Joint Committee to move as quickly as possible to complete the JCS review when the Secretary of State's decision on Rushden Lakes is available. The consultation identified further work that would need to be undertaken in finalising the IHPS (paras 6.25-6.35) and producing the pre submission JCS and its evidence base (paras 6.58-6.64).

6.66 In relation to the Interim Housing Statement further work was undertaken to address the issues identified in the representations that were detailed at paras 6.26-6.36. This work included commissioning the Cambridge Centre for Housing and Planning Research to undertake further demographic work to advise on whether/how the latest official projections should be adjusted to provide a prudent basis for planning for Housing in North Northamptonshire.

6.67 The revised IHS was reported to the 9th January 2014 JPC[23], with the committee report providing a detailed response to the key issues raised in the consultation responses, and setting out how further dialogue was undertaken with adjoining authorities. The JPC agreed the responses to the issues raised in the consultation and agreed the IHS as a material consideration that should be taken into account in the calculation of housing land supply requirements. The work undertaken, including consultation on the IHS to identify the Objectively Assessed Need in North Northamptonshire was taken forward within the Pre-Submission JCS.

6.68 The JPU undertook the further work identified above, which informed the development of the Pre-Submission Plan. Further dialogue with key stakeholders such as the Environment Agency, Anglian Water, Highways Agency, NCC Highways and English

[23] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2335/Committee/414/Default.aspx (Item 4)

Heritage was undertaken and was an important part of finalising the Pre- Submission plan, as well as being an essential element in satisfying the Duty to Cooperate detailed in paras 1.5-1.6. Ongoing dialogue was maintained with neighbouring authorities to ensure that cross boundary issues were fully understood and that strategic issues such as objectively assessed need were fully considered.

6.69 As the Secretary of State's decision on Rushden Lakes took longer than anticipated, being published on the 11th June 2014 it was necessary to report the Pre-Submission JCS in a number of sections to meetings of the JPC, rather than initially as a complete document.

6.70 These meetings comprised:

- *1St May 2014[24]: Protecting and enhancing assets and ensuring high quality development policies*
- *24th July 2014[25]: Connections within North Northamptonshire and the Green and Blue Infrastructure Framework*
- *4th September 2014[26]: Draft Vision and Outcomes and policies and text on Spatial Strategy and Delivering Homes*
- *2nd October 2014[27]: Draft policies and text on Rural Exceptions, Deenethorpe Airfield Area of Opportunity and Delivering Economic Prosperity*
- *3rd November 2014[28]: Introduction and Sections A-C of the JCS*

6.71 At the meetings referred to above, the relevant JPC reports set out in detail how the relevant policies and sections of them Pre-Submission JCS had been refined in the light of a number of issues. This included updated technical work, consultation responses raised to the relevant policies through the Emerging Plan and Interim consultation and how the JCS had been refined in the light of these, alongside further dialogue that had been undertaken with key stakeholders to response to consultation responses and how this had informed the development of the JCS. The reports included further analysis on the key issues that had been identified through the development of the JCS. The relevant consultation responses were appended to the JPC reports so that they could be reviewed by the JPC when agreeing the relevant sections of the Pre-Submission JCS. This was considered necessary given the time that had elapsed since the policies were consulted on in the Emerging JCS, and consultation responses reported to the JPC.

Spatial Strategy (Role of the rural areas)

6.72 One issue, which required further refinement from the Emerging Plan (August 2012), was the approach to the rural areas in North Northamptonshire The initial version of the spatial strategy consulted on in the Emerging Plan (Draft Policy 10/ Table 2 –

[24] http://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2362/Committee/414/Default.aspx (Item 5)

[25] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2427/Committee/414/Default.aspx (Item 6)

[26] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2432/Committee/414/Default.aspx (Item 4)

[27] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2437/Committee/414/Default.aspx (Item 4)

[28] https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2439/Committee/414/Default.aspx (Item 4)

Settlement Roles) (as referenced at para 5.1) proposed two categories of town (Growth Towns and Market Towns), together with two categories of village (Principal Villages and Smaller Villages). This reflected recommendations in the JPU Background Paper, "Developing a settlement hierarchy for the North Northamptonshire Joint Core Strategy"[29] (August 2012).

6.73 As referred to in Section 5, the Emerging Plan consultation (August – October 2012) revealed concerns regarding the proposed two-tier village settlement hierarchy; highlighting potentially increased development pressures upon specified Principal Villages. This matter was extensively considered by officers and Members throughout subsequent stages of drafting the Plan (2012-14). Ultimately, it was decided that a more general strategy for Villages would reduce unsustainable development pressures and therefore represent the most appropriate approach, albeit with an option to develop more detailed settlement hierarchies through Part 2 Local Plans. The overall spatial strategy (Policy 1/ Table 1: Spatial Roles) was agreed by the JPC on 4th September 2014. As referred to at paras 6.70-6.71 the relevant committee report sets this out in more detail.

6.74 It is clear that the JPU addressed the key issues that arose through the Emerging Plan consultation through further technical work and dialogue, and consultation on further elements. It should be recognised that the structure of the JCS remained unchanged from the Emerging Plan, to the Pre-Submission Plan and the majority of the policies have been refined rather than extensively re-drafted.

Approval of the Pre- Submission JCS

6.75 The complete Pre-Submission JCS was agreed for consultation by the JPC at its meeting on the 18th December 2014[30]. The JPC report set out the rationale for outstanding sections of the Pre-Submission JCS, including the refined Strategic Sites development principles. The JPC report referred to a number of the key issues that were raised in the interim consultation in relation to strategic sites detailed at paras 6.59-6.65 and how these had been progressed. A response to key methodological issues raised to the strategic sites assessment in paras 6.33-6.39 was also appended to the JPC report.

6.76 Furthermore, as part of this process and to inform the Pre- Submission JCS, an updated Strategic Sites Background Paper was prepared and reported to the JPC, which included a response to relevant site specific issues identified in the Interim consultation, illustrating how key issues arising from the representations had been addressed. The Strategic Sites Development principles were amended, where necessary following consultation feedback and further dialogue with key agencies to address the issues raised through the consultation.

29 http://www.nnjpu.org.uk/docs/Settlement%20Hierarchy%20Background%20Paper%20FINAL%20JUL12.pdf

30 https://cmis.northamptonshire.gov.uk/cmis5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2446/Committee/414/Default.aspx (Item 4)

7. Conclusion:

7.1 The development of the Pre-Submission JCS has been an extensive and lengthy process, involving four stages of public consultation and ongoing dialogue with key agencies and adjoining authorities to satisfy the Duty to Cooperate. Alongside this, detailed work has been undertaken to understand the places within North Northamptonshire. This work and the value of it was recognised by CABE in its report[31] on the Place Shaping work in North Northamptonshire. Consultation on the scope of the plan and issues, alongside the detailed Place Shaping to understand North Northamptonshire in more detail allowed the development and testing of spatial options and the subsequent development of an Emerging Plan setting out key policies, taking forward key issues identified.

7.2 Feedback on the 2012 Emerging Plan and the interim consultation that was undertaken in 2013 were particularly relevant in identifying the further issues that needed to be addressed through ongoing technical work, including refining the policies, the strategic site assessment work, and objectively assessed housing need in North Northamptonshire.

7.3 From this Statement of Consultation, it is clear that a number of key issues and big ideas have been recurrent themes from the various stages of consultation and have been taken forward in the Pre-Submission JCS.

- **Up to date housing targets to meet the objectively assessed needs in North Northamptonshire** and to recognise the strategic opportunity to accommodate even more growth in Corby in line with the spatial strategy of the Plan (policies 28 and 29);

- **A more positive and flexible approach to economic development**, with minimum job targets to deliver at least one job for each additional worker, plus additional growth in the southern area to tackle high levels of out-commuting and a historic jobs/worker imbalance in the Four Towns area. New policies are proposed on rural diversification and logistics (policies 22 – 25);

- **The need for new infrastructure and new services to cater for new development and existing communities** by seeking to ensure that development must be supported by the timely delivery of infrastructure, services and facilities to meet the needs arising from the development and to support the development of North Northamptonshire (policy 10). The JCS also sets out key transport infrastructure priorities (policies 16 & 17);

- **An enhanced role for Rushden as a Growth Town** in recognition of local ambitions and the potential of the town to deliver significant new homes and jobs. The Sustainable Urban Extension proposed to the east of the town (policy 33) will play a major role in this, alongside the permitted retail and leisure development at Rushden Lakes;

- **Identification of Strategic Sites to help deliver new homes, jobs and infrastructure**. The Plan confirms support for strategic housing sites identified in previous plans and identifies the boundary of the Sustainable Urban Extension west of

[31] http://webarchive.nationalarchives.gov.uk/20110118095356/http:/www.cabe.org.uk/case-studies/north-northamptonshire/background

Corby (policy 32) and the broad location of a SUE to the east of Rushden (policy 33). A number of new strategic employment sites are identified and the area around the Rockingham Motor Racing Circuit (referred to as Rockingham Enterprise Area) is identified as having significant potential (policy 27). The Plan sets out development principles for these sites to guide their development;

- **Providing a framework for locally-driven plans in the rural areas**, through a simplified settlement hierarchy (policy 11) which provides more flexibility for local and neighbourhood plans to determine how much development is needed in local areas within the context of objectively assessed needs of the Housing Market Area. Strategic housing requirements are provided only for the four largest villages. A new policy (policy 13) outlines when development might be acceptable as an exception to the normal policy of restraint in the countryside and a long term;

- **Recognising the exceptional opportunity to consider a new village at Deenethorpe Airfield** exceptional opportunity is identified to consider a new village at Deenethorpe Airfield (policy 14);

- **Greater emphasis on urban design principles and how places could change for the better**, in particular to enhance design quality and emphasise the importance of connectivity to make it easier for people to get into town centres and out to surrounding countryside and ensure that new developments connect well to existing settlements (policies 8 and 15);

- **Stronger recognition of the importance of the natural environment and the opportunities it provides**, with new special policy areas for the Nene and Ise Valleys and the Rockingham Forest to supplement the existing approach to Green Infrastructure, in particular recognising its role in enhancing connectivity between settlements (policies 19 – 21);

7.4 It is considered that the extensive work undertaken in the preparation of the JCS, has addressed and responded to the key issues raised through the consultation, and facilitated the development of a robust, sound plan which takes these forward within a comprehensive policy framework. The establishment of an extensive evidence base including consideration of reasonable alternatives through Sustainability Appraisal has reflected the need to fully explore and test in more detail the issues that have been identified through consultation.

7.5 As referred to in para 2.51 of the Pre-Submission JCS, the Vision and Outcomes incorporates the key principles, identified through 'place shaping' workshops in 2009/10 and taken forward throughout the Plan preparation process. These are that North Northamptonshire should be planned in a way that:

1. **Improves its self-reliance** in terms of both economic and social sustainability. This includes building up the network of settlements and the transport links between them so that together they can meet more of the needs of local people, thereby retaining people, wealth and skills in the area;

2. **Increases its resilience** to environmental and economic global changes. This includes promoting a strong 'green living' agenda, incorporating enhancement of the green environment, promotion of environmental technologies, requiring the highest possible standards of design in new development and seeking patterns of

development that allow people to choose healthy and environmentally friendly lifestyles including a shift away from car use; and

3. **Reinforces its special urban-rural character**, by enhancing the network of countryside and Green Infrastructure and maintains the separate and distinct character and identities of settlements by preventing coalescence.

7.6 As documented in this Statement of Consultation, the structure of the Pre-Submission JCS and the policies within it, have been clearly influenced by the consultation undertaken.

Appendix 1: List of Respondents to Regulation 25 consultation:

East of England Regional Assembly	Country Land and Business Association
Brudenell Estate	Carter Jonas LLP
Buccleuch Property/Boughton Estate	CABE
Northants Police	East Northamptonshire Council
Northants Churches	CPRE Northamptonshire
Northants Wildlife Trust	Warth Developments
Corby Borough Council	Wereldhave Property
Oundle Town Council	Barwood Land
The Coal Authority	David Lewis
Kettering Borough Council	Martin Lawrence-Harris
National Farmers Union	Robert Jays
Bovis Homes- Bob Rivers	Sport England
East Midlands Housing Association	Bovis Homes- Barry Herrod
Borough Council of Wellingborough	
Redhill Grange Residents Association	
British Pipeline Agency Ltd	
National Trust	
Broughton Parish Council	
Environment Agency	
GOEM	
Highways Agency	
East Midlands Regional Assembly	
West Northamptonshire JPU	
English Heritage	
South East England Regional Assembly	

Appendix 2: List of Respondents to Issues consultation

Organisations who responded to the Issues Consultation:

Aberdeen Property Investors
Aldi Stores Ltd
Barwood Land
Bovis Homes and Stanton Cross Landowners Group
Brudenell Estate
Buccleuch Property & Boughton Estate
Cambridgeshire County Council
CJC Developments
Corby Borough Council
CPRE
Croyland Residents against Over Development
Duchy of Lancaster
Earls Barton Parish Council
East Midlands Housing Group
East Northamptonshire Council
Easton Parish Council
Ecton Estate
English Heritage
First Renewable Developments
Gretton Brook Estates
Gretton Parish Council
Hallam Land Management
Harrington Parish Council
Hampton Brook
Highways Agency
John Martin Associates
Kettering Borough Council
LxB RP Rushden Ltd
National Farmers Union
Northamptonshire Enterprise Limited (NEL)
North Northamptonshire Landowners Group
Northamptonshire County Council
Northants Fire & Rescue
Northants Police
Orton Parish Council
Portfutures
Peterborough Diocesan Board of Finance
Persimmon Homes
Prologis
Redrow Homes South Midlands
Rockingham Forest Park
RPC Containers
Silverstone Estate Limited
Society of Merchant Venturers
Sport England
Stanwick Parish Council
Tata Steel

Taylor Wimpey
The Coal Authority
The Theatres Trust
The Wildlife Trust
Trenport Investments Ltd
Weldon Parish Council
Wereldhave Property Management
William Davis

138 responses from local residents and individuals were also received

Appendix 3: List of Respondents to Emerging JCS consultation

Reference number	Respondent	Respondent type
ED001	Trevor Haynes	Individual
ED002	Cllr A Mercer	Individual
ED003	National Farmers Union	Other Agency
ED004	River Nene Regional Park	Other Agency
ED005	Tony Skipper	Individual
ED006	Mary Wright	Individual
ED007	Rothwell Town Council	Parish/ Town Council
ED008	Rachel Terry	Individual
ED009	Mobile operators association	Other Agency
ED010	Northamptonshire Association of Youth Clubs	Interest Group
ED011	Sport England	Statutory Agency
ED012	Corby Borough Council	Local Authority
ED013	OPUN Architecture East Midlands	Other Agency
ED014	Bob Riddle	Individual
ED015	Western Power Distribution	Statutory Agency
ED016	Carter Jonas	Developer/ Land Owner
ED017	Raunds Town Council	Parish/ Town Council
ED018	Wollaston Parish Council	Parish/ Town Council
ED019	English Heritage East Midlands	Statutory Agency
ED020	Stanwick Parish Council	Parish/ Town Council
ED021	Sharon Ryan	Individual
ED022	Stanwick Parish Council	Parish/ Town Council
ED023	Wilbarston Parish Council	Parish/ Town Council
ED024	M. Mills	Individual
ED025	Thrapston Town Council	Parish/ Town Council
ED026	Great Bowden Parish Council	Parish/ Town Council
ED027	Bedford Borough Council	Local Authority
ED028	Tim Lichfield	Individual
ED029	Muriel Ames	Individual
ED030	Northamptonshire County Council	Local Authority
ED031	Higham Ferrers Town council	Parish/ Town Council
ED032	Highways Agency	Statutory Agency
ED033	GP Planning	Developer/ Land Owner
ED034	Peterborough City Council	Local Authority
ED035	Leicestershire County Council	Local Authority
ED036	Kier Homes	Developer/ Land Owner
ED037	Borough Council of Wellingborough	Local Authority
ED038	Peter Brett Associates on behalf of Barwood Strategic Land	Developer/ Land Owner
ED039	Mr Lazarus	Individual
ED040	Persimmon Homes	Developer/ Land Owner
ED041	North Northants Development Company	Other Agency
ED042	The Woodland Trust	Other Agency

ED043	The Theatres Trust	Other Agency
ED044	Huntingdonshire District Council	Local Authority
ED045	Henry H Bletsoe & Son	Developer/ Land Owner
ED046	Burghley House Preservation Trust	Developer/ Land Owner
ED047	Gretton Brook Estates	Developer/ Land Owner
ED048	Tony Skipper	Individual
ED049	Spire Homes	Developer/ Land Owner
ED050	Nene Valley Gospel Hall Trust	Interest Group
ED051	Duchy of Lancaster	Developer/ Land Owner
ED052	NNDC	Other Agency
ED053	Corby Borough Council	Local Authority
ED054	Hallam Land Management	Developer/ Land Owner
ED055	Rockingham Castle Estate	Developer/ Land Owner
ED056	The Great Oakley Estate	Developer/ Land Owner
ED057	Desborough Town Council	Parish/ Town Council
ED058	Redrow Homes	Developer/ Land Owner
ED059	Charles Church	Developer/ Land Owner
ED060	Natural England	Statutory Agency
ED061	Middleton Parish Council	Parish/ Town Council
ED062	Bovis Homes and Wellingborough East Landowners group	Developer/ Land Owner
ED063	Geddington, Newton and Little Oakley Parish Council	Parish/ Town Council
ED064	Hallam Land Management	Developer/ Land Owner
ED065	F G Saxby No4 Settlement	Developer/ Land Owner
ED066	Richard Elliot	Individual
ED067	French House Ltd (Land Owner)	Developer/ Land Owner
ED068	Nortoft Partnerships	Consultancy
ED069	David Carr	Individual
ED070	East Northants Faith Group	Interest Group
ED071	Susan Suttle	Individual
ED072	Davies and Co	Developer/ Land Owner
ED073	AP Lewis & Sons	Developer/ Land Owner
ED074	Chelveston Parish Council	Parish/ Town Council
ED075	Easton on the Hill Parish Council	Parish/ Town Council
ED076	David Coe	Individual
ED077	Nancy Jeffries	Individual
ED078	Trenport Investment	Developer/ Land Owner
ED079	New Urbanisms New Citizens (NUNC) Research Team	Other Agency
ED080	Rushden Town Council	Parish/ Town Council
ED081	Harrington Parish Council	Parish/ Town Council
ED082	Northants LLP	Developer/ Land Owner
ED083	Prologis	Developer/ Land Owner
ED084	David Lock Associates	Consultancy
ED085	Great Oakley Estate & Rockingham Castle Estate	Developer/ Land Owner

ED086	Nene Valley NIA	Other Agency
ED087	Oundle Town Council	Parish/ Town Council
ED088	Taylor Wimpey	Developer/ Land Owner
ED089	Mark Ormerod	Individual
ED090	Chris Stening	Individual
ED091	North Northamptonshire Landowners Group	Developer/ Land Owner
ED092	Commercial Estates Group	Developer/ Land Owner
ED093 & ED094	Wellingborough Chamber Chamber of Trade/Town Centre Partnership	Interest Group
ED095	Cambridgeshire County Council	Local Authority
ED096	East Northamptonshire Council	Local Authority
ED097	CPRE	Interest Group
ED098	Thorpe Malsor and Glendon Estates	Developer/ Land Owner
ED099	Persimmon Special Projects	Developer/ Land Owner
ED100	Cottingham Cum Middleton Copyholders	Developer/ Land Owner
ED101	CL Stopford-Sackville	Developer/ Land Owner
ED102	Trustees of Ecton Estate	Developer/ Land Owner
ED103	William Davis	Developer/ Land Owner
ED104	Hampton Brook	Developer/ Land Owner
ED105	Roxhill Developments	Developer/ Land Owner
ED106	Barwood Land	Developer/ Land Owner
ED107	Northamptonshire Police & Northamptonshire Fire & Rescue Service	Statutory Agency
ED108	Beeches Farm	Developer/ Land Owner
ED109	SCAPE	Developer/ Land Owner
ED110	LA and P and Deene Estate	Developer/ Land Owner
ED111	Boughton Estate and Buccleuch Property	Developer/ Land Owner
ED112	Land owners east of Rushden	Developer/ Land Owner
ED113	Gladman Developments	Developer/ Land Owner
ED114	Owners of land at Park Farm Way, Wellingborough Developer/ Land Owner	Developer/ Land Owner
ED115	Redrow Homes	Developer/ Land Owner
ED116	Aberdeen Property Investors	Developer/ Land Owner
ED117	Sainsbury's Supermarket	Developer/ Land Owner
ED118	Standard Life Investments	Developer/ Land Owner
ED119	Homebuilder's Federation	Other Agency
ED120	Midland Co-operative Society Limited	Developer/ Land Owner
ED121	The National Trust	Statutory Agency
ED122	The Society of Merchant Ventures Owner	Developer/ Land
ED123	Michael Kent	Developer/ Land Owner
ED124	West Northamptonshire Joint Planning Unit	Local Authority
ED125	Duchy of Lancaster	Developer/ Land Owner
ED126	Gretton Parish Council	Parish/ Town Council
ED127	Environment Agency	Statutory Agency
ED128	Barry Waine on behalf of Clients	Developer/ Land Owner
ED129	Titchmarsh Parish Council	Parish/ Town Council
ED130	Earls Barton Parish Council	Parish/ Town Council
ED131	National Federation of Gypsy Liaison Groups	Other Agency

ED132	Stepnell ltd	Developer/ Land Owner
ED133	Rothwell Land Ltd	Developer/ Land Owner
ED134	Campaign for Dark Skies	Interest Group
ED135	Deene & Deenethorpe Parish Council	Parish/ Town Council
ED136	Broughton Parish Council	Parish/ Town Council
ED137	Kettering Borough Council	Local Authority
ED138	Cottingham Parish Council	Parish/ Town Council
ED139	Northamptonshire Wildlife Trust	Statutory Agency
ED140	Jo and Alec Bates	Individual
ED141	Northamptonshire County Council Transport	Local Authority
ED142	Weldon Parish Council	Parish/ Town Council

Appendix 4: List of respondents to Interim Consultation

Reference	Respondents
1	Phil Thompson
2	Sport England
3	Natural England
4	Western Power
5	Wilbarston Parish Council
6	Leicestershire County Council
7	Dutchy of Lancaster
8	Earls Barton Parish Council and Earls Barton Neighbourhood Plan Project Team
9	Bedford Borough Council
10	Persimmon Homes Midlands
11	Rachel Terry
12	Raunds Town Council
13	Wollaston Parish Council
14	Craig Childs
15	Stanwick Parish Council
16	John Kellet
17	Godfrey-Payton
18	Michael Mills
19	Northamptonshire Police
20	North Northants Development Company (NNDC)
21	Higham Ferrers Neighbourhood Plan Steering Group
22	Mears Ashby Parish Council
23	Kettering Borough Council
24	Jennifer Dixon
25	CPRE North Northants
26	Mr and Mrs Ray
27	Wilby Parish Council
28	Paula Holmes

29	Berry Bros
30	National Federation of Gypsy Liaison Groups
31	Irchester Parish Council and Irchester neighbourhood Plan Group
32	Barratt Developments and Taylor Wimpey Ltd
33	AFC Rushden and Diamonds
34	Rutland County Council
35	Highways Agency
36	West Northamptonshire JPU
37	French House Ltd
38	Rushden East Landowners
39	George Thompson
40	English Heritage
41	Hallam Land Management and BS Pension Fund Trustees
42	Home Building Federation
43	Higham Ferrers Town Council
44	Collyweston Parish Council
45	Tata Steel
46	Geoff Taylor
47	Hampton Brook
48	Barwood Strategic Land II LLP
49	Taylor Wimpey East Midlands
50	Midlands Cooperative Society
51	Desborough Town Council
52	Gladman Developments
53	Corby Borough Council
54	Bovis Homes
55	Hallam Land Management
56	Trustees of FG Saxby No 4 Settlement
57	Pegasus Group
58	Barwood Land and Estates Ltd

59	Newton Bromswold Parish Council
60	Goodman UK Ltd
61	Barwood Developments
62	UK Strategic Land
63	Harborough District Council
64	Nene Valley NIA
65	LxB
66	The Boughton Estate and Buccleuch Property
67	Baratts
68	Drayton Estate
69	Nene Valley Gospel Hall Trust
70	Tata Steel
71	Northamptonshire County Council Highways
72	Roxhill Developments Ltd
73	Environment Agency
74	Redrow homes South Midlands
75	Knights of Old
76	Legal and General
77	Living Land Ltd
78	Mr William Kiff
79	Hampton Brook
80	Davies and Co
81	Aberdeen Asset Management
82	Mr Michael Kent
83	Susan Suttle
84	Mr and Mrs Argo
85	First Renewable Developments Ltd
86	Oundle Town Council
87	Stagecoach Midlands
88	Middleton Parish Council

89	East Northamptonshire Council
90	Persimmon Homes East Midlands
91	David Reynolds
92	Gretton Brook Estates
93	Great Oakley and Rockingham Estates
94	Burton Latimer Town Council
95	Chelveston-cum-Caldecott Parish Council
96	Owners of land off Park Farm Way/Shelley Road
97	Borough Council of Wellingborough