



The Planning Inspectorate

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# **Report to the North Northamptonshire Joint Committee**

**by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCM**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date 22 June 2016**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE NORTH NORTHAMPTONSHIRE  
JOINT CORE STRATEGY**

**LOCAL PLAN**

Document submitted for examination on 31 July 2015

Examination hearings held between 17 and 27 November 2015

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## Abbreviations Used in this Report

AA	Appropriate Assessment
CSS	Core Spatial Strategy
DtC	Duty to Co-operate
EA	Environment Agency
GIDP	Green Infrastructure Delivery Plan
HE	Highways England
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
JCS	Joint Core Strategy
JPU	Joint Planning Unit
LDS	Local Development Scheme
LP	Local Plan
LPA	Local Planning Authority
MM	Main Modification
NCC	Northamptonshire County Council
NE	Natural England
NPPF	National Planning Policy Framework
NTP	Northamptonshire Transport Plan
OAN	Objectively Assessed Need
SA	Sustainability Appraisal
SCG	Statement of Common Ground
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SUE	Sustainable Urban Extension
VS	Viability Study

## **Non-Technical Summary**

This report concludes that the North Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS) provides an appropriate basis for the planning of the area, providing a number of main modifications are made to the plan. The Joint Planning Unit (JPU) has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications were proposed by the JPU and have been subject to public consultation and SA/SEA, although I have amended the detailed wording where necessary for soundness and/or clarity. I have recommended their inclusion after considering the representations from all other parties on these issues.

The main modifications can be summarised as follows:

- Include a new annual monitoring requirement to trigger swift action by each constituent Council affected in the event that new housing delivery falls materially below that required in policy 28 plus a 25% monitoring buffer (new Appendix 4, Annex B);
- Clarify the new jobs provision to be sought across the area by 2031;
- Expand the approach to apply in respect of the Upper Nene Valley Gravel Pits Special Protection Area regarding mitigation in policy 4 and its supporting text;
- Amend all references to encouraging the use of previously developed land to accord with the NPPF;
- Revise policy 9 regarding sustainable buildings to reflect the current national position;
- Refine policies 27, 32 and 35, amongst others, to better reflect current circumstances and realistic delivery prospects;
- Update the Infrastructure Delivery Plan (Table 8);
- Add new Appendix 3 listing all policies in existing plans for the area to be superseded by this Plan once adopted.

## Introduction

1. This report contains my assessment of the North Northamptonshire Joint Core Strategy Local Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authorities have submitted what they consider to be a sound plan. The basis for my examination is the submitted draft plan of 31 July 2015, which incorporates the focussed changes that were subject to public consultation in June 2015 (SUB 3/4), following publication in January 2015 (SUB 1).
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7c) of the 2004 Act, the Joint Planning Unit (JPU) on behalf of the Councils requested that I should recommend any modifications needed to rectify matters that make the Plan unsound and thus incapable of being adopted. These main modifications are set out in the Appendix. They are all necessary for soundness and all relate to matters that were discussed at the examination hearings. Following these discussions, the Council prepared a schedule of proposed main modifications and carried out sustainability appraisal (SA/SEA) and this schedule has been subject to public consultation for six weeks.
4. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications where these are necessary for soundness, consistency and/or clarity. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have referred to these amendments in the report.

## Assessment of Duty to Co-operate

5. Section 20(5c) of the 2004 Act requires that I consider whether the Councils complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. It is a requirement that Councils engage constructively, actively and on an on-going basis with the County Council, neighbouring local authorities and a range of other organisations, including Highways England (HE), the Environment Agency (EA) and Natural England (NE). All relevant bodies listed in Regulation 4 have been engaged, albeit some more than others depending on the extent of their involvement in the plan's particular policies and proposals.
6. In the Statement of Consultation (Jan 2015) (SUB 5), Addendum and updates (June/July 2015) (SUB 6-10), the JPU on behalf of the Councils has

satisfactorily documented where and when co-operation has taken place, with whom and on what basis, as well as confirming that such positive engagement has and will continue. This includes previous co-operation on a wider regional and sub-regional basis in relation to implementing the former East Midlands Regional Strategy and the direct involvement of Northamptonshire County Council (NCC), who are part of the Joint Committee that prepared the plan, in accord with the Joint Committee Order (SI 2008 No. 1552) under which it operates.

7. There is also clear evidence of continuous co-operation with the equivalent JPU for the rest of the county (West Northamptonshire), amongst others; the outcomes of which demonstrate constructive engagement by the JPU/Councils on an on-going basis, including in relation to the proposed main modifications. In addition, the plan is consistent with the relevant Corporate Plans of all four Councils, as well as the County Council.
8. For the time being at least, none of the area's neighbouring Councils has specifically sought help in meeting their local housing or other needs and the JPU has not asked any other authority to help it; nor does it intend to. Furthermore, no significant cross boundary strategic issues relating to co-operation with neighbouring Councils or Reg. 4 bodies remain unresolved. Any future requests that may come from neighbours for help in regard to their objectively assessed needs would be a matter for a plan review to consider at the appropriate stage(s). Therefore, given the absence of any clear evidence to the contrary, I am satisfied that the duty to co-operate has been met.

## **Assessment of Soundness**

### **Preamble**

9. As is often the case, the main areas of debate surrounding this plan relate to the provision of new housing and employment. Clearly, the plan is expected to comply with the National Planning Policy Framework (NPPF) (March 2012), including by defining the full, objectively assessed, needs for both market and affordable new housing at the outset (para 47 NPPF), before deciding whether or not it can be delivered in practice, taking into account relevant national and important local constraints, such as flood risk.
10. Some respondents expressed doubts about the JPU's approach to new housing provision in the submitted plan, not least regarding the initial assessment of need, including in relation to the former East Midlands Regional Strategy. However, as detailed below, I am satisfied that local needs have been objectively assessed by appropriate analysis during the plan preparation process, including in relation to the Planning Practice Guidance (PPG), and that there is no need to revisit the overall requirements of the Plan. Taken together I consider that, whilst ambitious and challenging, the Plan's policies, proposals and allocations should enable them to be met over the plan period.
11. The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process for a qualifying plan or project requires, amongst other things, an assessment of reasonable alternatives on a comparative basis to the preferred option(s) and the provision of at least summary reasons why the preferred option was chosen. Also taking into account all the responses to the public

consultation on the Addendum published with the main modifications (EXAM 10), I am satisfied that the SA/SEA process for this Plan (SUB 11) has been suitable and appropriate in its coverage and conclusions, including regarding the necessary consideration of reasonable alternatives at each relevant stage, such as the dispersal of growth across the area rather than an urban focus on the Growth Towns. Overall, therefore, the SA/SEA process for this plan has been satisfactory.

12. Moreover, all of the work done at various stages on the Habitats Regulations Assessment/Appropriate Assessment (HRA/AA) (SUB 13) is also satisfactory, particularly given that necessary amendments were made to subsequent versions of the Plan. Accordingly, taking into account advice from relevant consultees, notably Natural England (NE) (SCG 11), the Plan, as proposed to be modified, is sound in these respects and consistent with the NPPF.
13. All the available evidence and particularly the Reg. 22(1) statement of consultation (SUB 5) and update (SUB 7) (Jan 2015) confirms that the JPU and its constituent Councils have carried out extensive and appropriate public consultation at each relevant stage of the plan preparation process and I have considered all comments duly made. This includes in respect of the proposed main modifications.

### **Main Matters**

14. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified fourteen main matters upon which the soundness of the Plan depends.

#### **Matter 1 – Strategy, Vision, Outcomes (Policies 1 and 11)**

*Issue 1 - Does the plan provide an appropriate spatial vision for the area, consistent with national policies in the NPPF and/or justified by clear and robust evidence, and will the strategy satisfactorily and sustainably deliver the development needed to meet the outcomes sought over the plan period ?*

15. This Joint Core Strategy/Local Plan Part 1 (hereafter called the Plan) has been prepared by a Joint Planning Unit (JPU), on behalf of the North Northamptonshire Joint Committee. This committee comprises representatives of four district/ borough Councils (Corby, East Northamptonshire, Kettering and Wellingborough), and Northamptonshire County Council (NCC). The Plan has been prepared in close consultation with the JPU for the other half of the county (West Northamptonshire). It is a review of a Joint Core Spatial Strategy, the first in the country, adopted in 2008, that established an urban focus for new development in the area, as well as identifying key infrastructure priorities and the broad locations of Sustainable Urban Extensions (SUEs), that is largely continued in this Plan.
16. There are extensive planning commitments across the area deriving from the 2008 plan that limit the opportunity to alter the urban focus for new development between now and 2031 or thereabouts. Nevertheless, there are no real advantages apparent in extending the plan period, as suggested by one or two representors, particularly as a review of the Plan will inevitably be necessary at some point well before 2031, possibly after the 2021 Census.

17. However, there are some important changes to the former strategy in this Plan, including updated levels of new development based on current objectively assessed needs (OAN), stronger policies to protect and enhance the environment locally, and the introduction of a Growth Town role for Rushden, given its level of services and facilities as well as the opportunities for sustainable development available there. Taken together with the identification of additional SUEs to help meet OANs and the recognition of the potential for higher levels of new development at Corby to enhance its realistic growth prospects, the Plan provides a suitable and sustainable strategy for the area over the plan period to 2031 and, in some respects, slightly beyond.
18. Alongside the strategy, the Plan also sets out a vision for the medium term future that encompasses realistic objectives for the whole area in relation to sustainable development, in addition to more specific aims for the individual large towns of Corby, Kettering and Wellingborough, as well as for the more rural area of East Northamptonshire. It is locally distinctive, including through the recognition of the relative roles of the four boroughs/districts that make up the plan area. This is reflected in a series of ten outcomes, on which the achievement of the vision depends, each of which is somewhat aspirational and in some instances challenging, but nevertheless have reasonable prospects of success over the plan period.
19. In this local context and taking into account what has been achieved through the 2008 plan, the urban focus of the strategy, including on large SUEs around the main towns, is sound and suitable, in principle, to deliver the vision and outcomes. It is also consistent with national policies in the NPPF, including in terms of the promotion of sustainable development, as reflected in policy 1 of the Plan, which is sound. Furthermore, the supporting evidence base relating to the strategy, vision and outcomes provides the necessary clear and robust justification for the choices made by the JPU, including in respect of the reasonable alternatives considered at the various stages of the plan preparation process, and in the accompanying SA/SEA (SUB 11), which considered initially four and then five, including dispersal, strategic options for accommodating the necessary growth.
20. For example, it is sufficiently detailed and comprehensive to demonstrate that an alternative strategy of reliance on a significantly more dispersed pattern of growth across the Market Towns and Rural Areas would not be more sustainable or even more realistically deliverable, having regard to national policies in the NPPF and relevant local constraints. These include flood risks, impacts on existing transport networks and the resource and delivery implications for new infrastructure provision on a less concentrated basis, such as for education when the expansion of rural primary schools is not always practical or viable. In particular, the JPU's work underpinning the selected strategy has been thorough and essentially objective, whilst taking into account the Plan's role as a review of the 2008 plan and the experience to date of its implementation in practice.
21. Policy 11 sets out the network of urban and rural areas that the distribution of new development seeks to strengthen in the most sustainable manner by focussing infrastructure investment and higher order facilities to support major growth first on the Growth Towns, mainly for housing and employment but also for retail and leisure uses. Clearly, this includes the SUEs as strategic

locations for new homes and jobs, where the Strategic Sites Background Paper (SAP 2) suitably details the assessment work used to inform the consideration of alternatives, with the methodology appropriately reflecting that in the SA.

22. At the next level, Market Towns will accommodate lower levels of growth, commensurate with their character and infrastructure so that they continue to perform a service role within the settlement hierarchy. In the Rural Areas, apart from at Deenethorpe Airfield (policy 14), development will be limited to that necessary to meet locally arising needs and/or support a prosperous rural economy. In my judgement, the settlement hierarchy provides a sensible and straightforward, rather than over-complex or mechanistic, framework for Part 2 Local Plans (LP) to suitably address more detailed aspects in relation to individual towns and villages, as well as for the rural areas.
23. Accordingly, it is concluded that the Plan's strategy and spatial vision is in accord with the NPPF, fully supported by satisfactory evidence in all respects and both suitable for the area and sustainable. Moreover, notwithstanding that some elements are aspirational and some are likely to prove challenging, such as the levels of housing delivery anticipated at some of the SUEs, there are clearly reasonable prospects that the new development needed to achieve the outcomes sought can be sustainably delivered over the plan period, as evidenced in the Viability Assessment (VA) (VIA 2) and Addendum (VIA 1) (July 2015). However, the duplicated reference to previously developed land at the end of policy 11 needs to be deleted for clarity within the document and for consistency with the NPPF (**MM 6**), but on this issue it is otherwise sound in all other respects, including in relation to the network roles of settlements in Table 1 and the place shaping principles in Table 2.

## **Matter 2 – Environment, Landscape, Community Services and Facilities, Green Infrastructure (Policies 2 to 9 and 19 to 21)**

*Issue 2 – Are the policies realistic, consistent with national guidance and likely to prove effective in practice ?*

24. It is effectively common ground that both policies 2 (Historic Environment) and 3 (Landscape Character) are reasonable and realistic, as well as consistent with national guidance. Policy 2 contains clear criteria, deriving from section 12 of the NPPF, as does Policy 3, based on the Northamptonshire Environmental Character Assessment (ENV 18) and the Landscape Character Assessment (ENV 19). Both are sound without modification.
25. Policy 4 (Biodiversity and Geodiversity) has been the subject of concerns from Natural England (NE) regarding the future safeguarding of the Upper Nene Valley Gravel Pits Special Protection Area (SPA). Following a Statement of Common Ground (SCG 11) (November 2015) between NE and the JPU, modifications adding text to paras 3.40 and 3.42 as well as to the latter parts of the policy and referring to a Mitigation Strategy (to be completed by June 2016) for the SPA are necessary to clarify the policy and the details of its satisfactory implementation for soundness (**MM 2**). As modified, the policy would be consistent with paras 113, 114 and 157 of the NPPF, as well as core principle 7 thereof and thus sound.
26. In respect of water resources, environment and flood risk management, policy



5 is soundly based on a robust evidence base, including the North Northamptonshire Flood Risk Management Study (ENV 12). It has emerged from extensive consultations with relevant bodies, notably the EA, Anglian Water and NCC as the lead local flood authority, and is consistent with the requirements of the NPPF, including the associated Technical Guidance on flood risk. It is sound.

27. Policy 6, relating to brownfield and contaminated land, forms part of the overall, urban focussed, spatial strategy of the Plan in seeking to make best use of previously developed land and minimise the loss of greenfield sites to new development in meeting local needs. It is essentially consistent with national policy and guidance, including the relevant Ministerial Statement of 25 March 2015, but requires some amendment to avoid reliance on the word "priority", in both para 3.65 and the first part of the policy wording as this is not the term used in the NPPF regarding previously developed land (**MM 3**). As proposed to be modified, the policy would be reasonable, realistic and sound and should prove effective.
28. Regarding community services and facilities, policy 7 is in line with paras 69-77 and 156/157 of the NPPF in seeking to retain and enhance relevant assets. It contains a sensible and suitable approach to implementation, as well as having some flexibility regarding viability, to assist delivery and requires no modifications for soundness.
29. Policy 8 seeks high quality design in all new development in accord with the local place shaping principles set out in Table 2 (para 5.21) of the Plan and drawn essentially from the Urban Structure Study (PS 1). It properly reflects the promotion of sustainable development in the NPPF, in particular in terms of "requiring good design", as in paras 56-58 thereof. Accordingly, it is essentially sound, albeit one clarification is required in respect of community and fire safety measures under part e) v) of the policy to refer to "proportionate and" appropriate, so as to ensure that expectations are reasonable and that viability considerations are taken into account (**MM 4**).
30. North Northants has been classified as an area of water stress by the EA and therefore there is a clear and robust justification for applying the optional policy limitation allowed for in the context of the recently updated (October 2015) national Building Regulations of 110 litres per person per day, instead of the default 125 litres. Accordingly, the first part of policy 9 is consistent with national policy and sound in this respect. The second part of the policy referring to sustainable design principles for non-residential floorspace, as well as the use of passive solar design and access to decentralised energy networks for all development, where feasible, is also reasonable and realistic as a policy objective of the Plan.
31. However, regarding part 3, the national picture has changed since the policy relating to sustainable buildings and allowable solutions was drafted and submitted, including through publication of the Government's Productivity Plan in June 2015. The current national policy, announced in July 2015, effectively means that local energy standards and associated "allowable solutions" are neither necessary nor appropriate in the policy, given the reliance instead on the national Building Regulations for all new housing schemes. Consequently, policy 9 and its supporting text need to be altered, including by the deletion of

part 3, to omit such references for soundness and consistency with up to date national policies and guidance (**MM 5**).

32. Relating to the delivery of green infrastructure, policy 19 seeks to update policy 5 of the 2008 CSS, including taking into account the evidence in the Green Infrastructure Delivery Plan (GIDP) (ENV 6). It also aims to give suitable protection to the Upper Nene Valley Gravel Pits SPA, in accord with guidance from NE, in particular in part d), as well as other European designated sites. As part of a clear strategy for enhancing the natural environment of the area, including the designation of the Nene Valley Nature Improvement Area, it is consistent with the expectations of the NPPF, notably paras 114, 157, 178 and 179 thereof. Accordingly, it is sound.
33. The Nene and Ise Valleys are identified in policy 20 as priorities for green infrastructure investment, also reflecting the GIDP, and the range of projects already planned and underway. This includes the Nenescape project, as part of the Landscape Partnership Programme, that has recently (October 2015) been earmarked £2.8m from the Heritage Lottery Fund. Such initiatives are clearly encouraged by national guidance and the policy is therefore sound, as well as realistic bearing in mind that implementation has already commenced.
34. Similar conclusions apply in respect of policy 21 concerning Rockingham Forest, where significant new tree planting schemes have already taken place as part of the GIDP and the Rockingham Forest for Life project. Thus, taking into account the clear regeneration objectives and the specific delivery mechanisms listed in parts a) to e), this policy is clearly at one with the aspirations of the NPPF, including in relation to supporting a prosperous rural economy, and is already proving to be effective in practice, as well as reasonable and realistic.

### **Matter 3 – Housing (Policies 28 to 31)**

*Issue 3 i) – Does the plan meet the full objectively assessed need for housing in the area, including for affordable housing?*

*Issue 3 ii) – Is the distribution of development across the area the most appropriate/sustainable when all reasonable alternatives are considered ?*

*Issue 3 iii) – Are the scale and locations of new housing consistent with the plan's objectives and realistically deliverable over the plan period, including for affordable housing and with suitable infrastructure provision, in accordance with the NPPF ?*

*Issue 3 iv) – Are the overall policy requirements for new housing reasonable and realistic, including in terms of development viability ?*

*Issue 3 v) – Are policies 30 and 31 reasonable, realistic, consistent with national guidance and likely to prove effective in practice ?*

35. The Plan seeks the provision of a total of 40,000 new homes between 2011 and 2031, comprising 35,000 to meet local needs, plus a further 5,000 to take advantage of growth prospects in Corby and help achieve its regeneration objectives. The 35,000 figure is essentially based on the Cambridge Centre for Housing and Planning Research report of December 2013 (HOU 6), which analysed objectively assessed needs (OAN) across the North Northants

Housing Market Area, including around 15,500 (44% of this total based on the SHMA toolkit HOU 4) for affordable housing, as required by the NPPF. This total is not affected by any constraints to capacity or delivery.

36. The report took into account the DCLG 2011 based interim household projections, indicating an increase of 31,000 households in the area over the relevant period, again including the local need for affordable housing. This level of new housing would materially increase the momentum of growth established through the 2008 CSS, mainly through SUEs at the main towns.
37. By also making reasonable assumptions regarding the suppressed rate of household formation during the recent recession, including that there will be a gradual, rather than immediate, recovery to former rates, levels of in-migration and a 3% adjustment for vacant dwellings, the report concludes on an OAN of 34,900 net additional new homes, including affordable housing. This figure is derived from an accepted methodology carried out by a reputable organisation that is consistent with current national guidance in this regard. Accordingly, it is sound. The OAN figure has been rounded up to 35,000 to arrive at the housing requirement in the Plan. This is an ambitious but realistic scale of new housing delivery across the area over the plan period.
38. The argument that a much higher level of new housing should be planned for so as to align directly with a new jobs figure of 31,100 implies both spurious precision in the sense that it is not possible to co-ordinate the two to any meaningful degree through planning policies alone in a modern economy and also that the latter is a policy requirement of the Plan's strategy, rather than just an ambition. As modified (**MMs 17/18**), the Plan now makes it clear that it is the minimum jobs provision sought of 24,200 that relates to the level of new housing proposed. Therefore, the relationship with employment growth does not justify an increase in the total number of new homes planned. Even so, there is no cap or upper limit as such on the number of dwellings, subject to compliance with the policies of the Plan and, as confirmed in the Housing Background Paper (HOU 1) and July 2015 Addendum Note (HOU 2), there is available capacity at the SUEs and elsewhere for more than 40,000 new homes to be provided if the market demand exists.
39. Accordingly, I am satisfied that, as submitted, the Plan seeks to meet the full OAN for new housing in the area in accord with the requirements of the NPPF, including for affordable housing and that there are realistic prospects for the delivery of the latter through the Plan's policies and proposals, including policy 30 (as modified). This conclusion is reinforced by the fact that the net total of new homes is significantly more than twice the level needed to meet natural change in the existing population of the area (+15,100) alone over the same period. The additional housing at Corby (and at Deenethorpe Airfield) also provides a significant buffer above the OAN to allow for market signals in the HMA indicating rising prices in many localities.
40. The further 5,000 dwellings at Corby and the overall total of 40,000 net new homes over the plan period should also help to ensure that significantly higher numbers of affordable homes are provided towards meeting local needs, bearing in mind that this total represents a challenging increase of about 30% in delivery of all types of housing compared to that achieved during the last 20

years or so. Delivery of the Deenethorpe Airfield scheme (policy 14) would be additional to the above. Consequently, apart from the replacement of Figure 18 (para 9.8) with a revised/updated housing trajectory as part (Annex B) of new Appendix 4 (**MM 44**), that more accurately reflects realistic delivery rates at the SUEs (see below), no changes are required to policy 28 for soundness.

41. The distribution of housing in policy 29 obviously directly reflects the Plan's urban focus on Growth Towns, but also the overall settlement hierarchy, as set out in Table 5. It also takes into account that over half of the new households predicted in the area 2011 - 2031 derive from in-migration and are thus likely to be more mobile in seeking accommodation than those arising from locally generated needs. As a result it is logical that those households are catered for mainly in the most sustainable locations. The policy also clearly acknowledges Part 2 LPs as having a role in identifying sites at the non-strategic scale to help meet the expected totals, including for affordable housing, as well as rural exceptions sites in villages. The same applies to Neighbourhood Plans.
42. Moreover, the higher percentages of new homes to be provided at the Growth and Market Towns, compared to the existing distribution of dwellings across the area, notably as regards the Rural Areas, represents an important element that strengthens the sustainability aspects of the Plan's strategy. The Housing Background Paper (HOU 1) confirms that the pattern of development is heavily influenced by existing commitments, including at SUEs, and the SA (SUB 11) indicates some of the positive effects of the selected strategy and the settlement hierarchy.
43. This includes better opportunities for the use of public transport and reducing the overall need to travel, as well as in respect of the most economic use of resources to provide new and improved local services and facilities, including for health and education, for example. Accordingly, the general distribution of development across the area is appropriate and the scale and locations for new housing selected are suitable in principle, sustainable and consistent with the policies of the NPPF.
44. The balance between the various SUE locations in the Plan, both new and committed, is also sustainable and appropriate to meet local needs, as borne out by the SA/SEA process that examined reasonable alternatives. The same would not apply to a more dispersed pattern of new housing growth, with smaller scale schemes at less significant (and less sustainable) settlements. In fact the dispersal option was the least sustainable of the five alternative distributions tested as part of the SA/SEA process (SUB 11). Therefore, the general distribution of new homes across the Plan area is sound and consistent with the requirements of the NPPF.
45. However, there are understandable concerns from representors that the Plan's urban focus, and particularly the reliance on new development at the SUEs, risks a failure to deliver the necessary numbers of new homes should any unforeseen difficulties arise. This is partly based on previous delays on similar local sites, especially regarding viability and the timing of essential elements of infrastructure being implemented. There is no doubt that the delivery of the SUEs allocated in the 2008 CSS has not progressed on the timescales envisaged when that plan was adopted, albeit the single most important reason, the recent recession, was entirely outside the control of the JPU, its

constituent Councils or the developers directly involved.

46. However, most of the previously allocated SUEs are now underway, with others close to a start on site and developers committed to implementation as soon as possible. In this context it is very relevant that the government has recently provided substantial funding for a new Joint Delivery Unit, to focus first on helping bring forward SUEs at Corby, Kettering and Wellingborough. Moreover, there are also now government funding commitments to important local road schemes, such as the A45 Chowns Mill roundabout improvements, that will facilitate major development schemes.
47. In particular, the Homes and Communities Agency and the two Local Enterprise Partnerships covering the area are also providing significant funds for other new road schemes, such as at Stanton Cross, Wellingborough, Corby and Kettering. All of this high level activity is aimed at and should result in previously stalled major schemes progressing much more quickly than has been the case in the recent past. It is also relevant that the new SUEs at both West Corby and Rushden East do not require any major new infrastructure to be provided before new housing delivery can start.
48. Once underway, the SUEs have the potential to deliver significant numbers of new homes in a relatively short timescale, often through different developers operating from distinct sales outlets and offering alternative products to help achieve the growth necessary to meet the Plan's objectives. They are also capable of providing a range of size and type of new units to give choice for occupiers and some flexibility to house builders.
49. Notwithstanding, for this Plan's strategy to deliver the outcomes sought, the reliance on the SUEs requires that every effort is made by all concerned to assist their timely delivery, including importantly the start of development on site in each instance. To that end, there needs to be a clear policy explanation of what each newly allocated site is expected to deliver, so as to facilitate the preparation, negotiation and implementation of the necessary masterplans and the co-ordination of essential infrastructure provision. This is addressed in more detail in respect of each SUE under Matters 8–11 below. The reference to Rothwell North at para 9.17 needs to be updated accordingly (**MM 26**).
50. Of equal importance, there also needs to be clarity regarding the percentage of affordable housing to be sought, to assist the detailed implementation of each scheme through planning applications and permissions, as well as legal agreements. This is dealt with in relation to policy 30 below. Providing certainty that the initial target will be 20% should also make a contribution to the economic viability of the timely delivery of the SUEs and avoid the time and costs involved with the need for a site specific viability assessment to be prepared and considered in each and every instance.
51. In order to allay some the concerns referred to above, it is also essential to ensure that, in the event of the SUEs not delivering new housing as presently envisaged, for whatever reason, a suitable and sufficient system is in place to address problems as soon as reasonably practical so that the Plan's strategy is not thereby stalled. For that reason, it is important that the monitoring and implementation section of the Plan in particular is suitably flexible to provide a way forward, without leading to the need for a complete review, and that the

Plan contains sufficient detail of the necessary mechanism and how, why and when it would be instigated so that it can be readily implemented, if triggered.

52. This requires a revision of para 9.18 and an additional para 9.18a to be included in the Plan's supporting text (**MMs 27 + 41**), as well as rewording of para 9.38 (**MM 31**). For clarity the second para of policy 29 needs to be modified to more closely reflect the approach of the NPPF in respect of previously developed land (**MM 29**), alongside para 1.14 (**MM 1**).
53. With these modifications the new housing allocations in the Plan should prove to be realistically deliverable over the plan period (and in a few cases just beyond) in accord with the updated housing trajectory (**MM 44**), which has been prepared with detailed and up to date inputs from the relevant site developers and promoters (SCGs 1-10), albeit still challenging for the JPU and its constituent Councils to deliver on time. The revised Table 8 (**MM 40**) and update IDP (TRA 1 & 1a) also now provide sufficient information to conclude that the necessary associated infrastructure can be delivered as and when needed alongside new development through the provision of the required resources.
54. The VA update report (October 2015) (PC 1B), which looked specifically at the SUEs, together with SCGs 1-10 prepared by the JPU and the respective developers, provides reassurance that each is now considered to be essentially viable and deliverable over the plan period based on current costs. This will be assisted by confirmation that the initial target for affordable housing at the SUEs will be 20% and also that policy 9 will be simplified to reflect the current national position (see below). Consequently, it is reasonable to conclude that, as modified, the overall policy requirements for new housing are realistic and reasonable, including in terms of development viability.
55. Regarding housing mix, policy 30 provides the approach to considering house sizes and related matters, including encouraging new schemes to help meet the needs of particular groups, such as the increasing percentage of elderly people in the local population, based on the SHMA (Dec 2013) (HOU 4) and 2015 update (HOU 6). They confirm that there is a clear need for smaller units in both market and affordable sectors.
56. As for tenure, the SHMA update (Jan 2015 (HOU 4) indicates a significant need for affordable housing provision of all types. However, this has to be tempered by realism in respect of the economic viability of new housing developments across the area. Accordingly, the Jan 2015 Viability Study (VS) has been properly relied on to identify aspirational but realistic percentages to be sought on new market sector schemes, with a higher rate of 40% applying in the rural areas, villages and Oundle, where house prices are generally higher, and 30% elsewhere. All the available evidence indicates that, with one important exception, these rates are generally reasonable, realistic and largely at least, deliverable over the plan period in overall viability terms, as reflected in recent planning permissions granted locally.
57. However, as referred to above, both the VS and the Plan itself recognise that 30% affordable housing is not likely to be achievable in the SUEs, at least in their early phases. This is largely the result of the essential "up front" costs for new infrastructure that inevitably apply on schemes of such scale (500

units or more) in order to deliver sustainable forms of development. Accordingly, the Plan says at para 9.36 that the SUEs "are committed to deliver up to 20% affordable housing", but this is not included in the policy.

58. To provide certainty for all concerned and particularly to assist and not delay early implementation in circumstances where the annual delivery rates, even based on the revised and updated new housing trajectory (Appendix 4), are ambitious, it is essential that the wording of part d) of policy 30 is clear that the initial target for affordable housing in the SUEs is 20%, with provision for later review, (**MM 30**) and the supporting text in para 9.36 amended accordingly (**MM 28**).
59. The recent Court of Appeal judgement (11 May 2016) regarding the written ministerial statement of 28 November 2014 relating to affordable housing on smaller sites confirms that it is once again part of national planning policy. Therefore, the second sentence of para 9.38, as submitted, should not be deleted, as proposed to be modified, but retained and the threshold numbers referred to there and in part d) of policy 30 should revert to their original figures of 11 or more dwellings (rather than 5 or more) in the rural areas (**MM 30**). Also, for consistency with national guidance, the site area thresholds should be replaced with thresholds based on the combined Gross Floor Area of dwellings on a site. The government's intention is that the 11 dwelling threshold will materially assist the delivery of new homes from smaller scale schemes and enable them to make a greater contribution to meeting local housing needs.
60. Policy 31, relating to the needs of gypsies, travellers and travelling show people, sets out appropriate detailed locational criteria for new sites and the consideration of specific proposals, as well as seeking to protect existing lawful sites, pitches and plots for continuing use. Together these provide relevant and reasonable guidance for the allocation of new sites in Part 2 LPs, in accord with the requirements listed in Table 7, which reflect the needs identified in the 2011 Northamptonshire Gypsy and Traveller Accommodation Assessment up to 2022 (HOU 16). Given that this is a strategic scale plan, to be followed by Part 2 LPs that will allocate sites to meet the identified requirements, this policy is an acceptable way forward to help meet gypsy and traveller needs across the area up to and beyond 2022 and accords with the latest national policy position as set out in Planning Policy for Traveller Sites (August 2015).
61. In conclusion and in the light of all of the above, the Plan's housing strategy and policies 28-31, as modified, should prove effective in providing the necessary new homes across the area over the plan period. It will provide a significant boost to new housing supply, as expected by the NPPF, and help ensure a rolling 5 year land supply in all of the constituent Council areas, notably through the new allocations made but also by providing the necessary framework for Part 2 LPs and Neighbourhood Plans to identify further non-strategic sites, where necessary.

#### **Matter 4 – Employment (Policies 22 to 27)**

*Issue 4 – Is the employment strategy appropriate and deliverable, are the policies consistent with the NPPF and/or justified by clear and robust evidence, and will they reasonably and realistically deliver the levels of new jobs sought ?*

62. The Plan's strategic objectives and policies regarding employment seek to deliver a more prosperous and diverse economy in the area, that is also more self-reliant in terms of achieving a better balance between homes and jobs locally over the plan period. To this end, it is essential to clarify in policy 22 in particular, but also in various places in the text, that the figure of 31,100 new jobs by 2031 is an aspirational target, the delivery of which should materially improve self-reliance locally, but which is not directly derived from the total number of new homes proposed. However, based on the East of England Economic Forecasting Model, the Employment Background paper (ECO 1 - Table 9) states that a minimum of 24,200 new jobs is needed to roughly balance the planned for number of new homes across the area and largely maintain the present balance. Therefore, this figure also needs to be included for clarity and to facilitate monitoring of the Plan's implementation over time (**MMs 17/18**). For consistency, the word "minimum" to describe the job targets in Policy 23 should also be deleted from JCS paragraphs 8.1 and 9.4 and Table 9.
63. Para 8.9 of the Plan sets out the three key priority employment sectors that provide the best opportunities for future economic growth locally, based on existing sectoral strengths, namely logistics, high performance technologies (e.g. motorsports) and green technologies. These are reflected throughout the employment policies, but particularly identified in part a) of policy 22 in order to ensure the delivery of sufficient high quality sites over the plan period and maximise new jobs provision towards meeting the overall target. For similar reasons, criteria b) and c) recognise the importance of safeguarding and, where possible, enhancing existing and committed employment sites, except where there are no reasonable prospects for regeneration and/or reuse of previously developed land, in accord with the NPPF (para 22).
64. Nor is there anything in this policy, or elsewhere in the Plan, that seeks to preclude the expansion of existing employment sites, providing that they are suitably located in sustainability terms and that proposals do not conflict with other relevant policies. Therefore, there is no need for any additional wording to this effect in the policy, particularly in the context of an identified general over supply of employment land in the area at present.
65. Policy 22 is otherwise essentially consistent with national policies, but clarifications are required as the first point of part c) should refer to sites within the SUEs and reference to the overall supply and quality of employment land locally is superfluous if "no reasonable prospects" of re-use have been demonstrated, and so this should be deleted from part c) (**MM 18**). With these changes, policy 22 is sound.
66. The anticipated distribution of jobs in all sectors across the area in policy 23 reflects not only the significant over supply of B1 use class land compared to current market demand locally, but also the evidence in the Employment Background Paper (ECO 1) (Jan 2015) in relation to an increased target for East Northamptonshire (5,200 to 7,200) and the requirement for additional B8 land in Kettering borough that is addressed in policy 37. The latter has led to the identification of new strategic sites at both junctions 9 and 10 of the A14 in the Plan.
67. Subject only to the deletion of "existing" as not needed in part b) (**MM 19**),



this policy is therefore sound and justified by the relevant up to date evidence. This includes its identification of town centres and the areas around rail stations as the preferred locations for new office developments for sustainability reasons, such as reducing the overall need to travel, and that it is not over-prescriptive in splitting jobs targets into particular use classes, as this is very difficult to predict in a fast changing economic climate nowadays.

68. Logistics is a clear sectoral strength of the local economy that is expected to make an important contribution to economic growth in the area in the short to medium term. It is therefore appropriate that policy 24 seeks to plan positively to meet reasonable requirements, including by allocating additional sites at Kettering (policy 37), but in the context of the infrastructure and environmental capacities of the locality.
69. Nonetheless, the requirement in part a) for some smaller employment units on large distribution sites has to consider viability, as well as market demand, and the policy wording needs an addition accordingly for effectiveness (**MM 20**). Moreover, it is the scale and nature of the material impacts that is relevant in terms of 24 hour operations (**MM 21**) and the potential effects of extra HGV movements fall within the overall term "highway impacts" and so do not need to be singled out (**MM 22**). Subject to these three modifications for clarity, policy 24 is also sound and consistent with the NPPF's policies.
70. Policy 25 regarding rural economic development and diversification acknowledges that, notwithstanding the Plan's urban focus for growth, rural areas have a relevant and continuing role in the overall economy of the area, not least in respect of agriculture and tourism. Consistent with para 28 of the NPPF, the policy also reflects the priorities identified in the Nene Valley Strategic Plan (ENV 15), without precluding other types of opportunities coming forward. However, such schemes need to be sustainable in general terms and part 1 of the policy requires an addition accordingly for soundness. Part 2 also needs to be clarified to give some flexibility for suitable non-farm related diversification businesses and operations to come forward where appropriate (**MM 23**). With these modifications, policy 25 is sound, as well as realistic and likely to prove effective in practice.
71. Proposals for renewable/low carbon energy, such as at Kettering Energy Park at Burton Wold, would be judged against the criteria listed in policy 26, which lead on from criterion a) of policy 22. These are essentially consistent with the PPG on Renewable and Low Carbon Energy, as well as reflecting those in the Wind and Solar Energy SPD (September 2014) adopted by East Northamptonshire Council. However, following representations from Historic England and the National Trust, the JPU has prepared a rewording of part c) of policy 26 to improve consistency with the requirements of the NPPF on this matter (**MM 24**). The policy is sound, as modified, as well as realistic and likely to prove effective in practice.
72. The 300 ha Rockingham Motor Racing Circuit Enterprise Area on the north east edge of Corby is a key site in local economic terms and thus requires a positive policy framework to help bring forward high quality development, as soon as possible. However, given that the previously agreed Development Framework (Jan 2011) (ECO 13) now seems unlikely to prove deliverable, largely for viability reasons, it is necessary to significantly amend policy 27

and its supporting text in order to enhance the realistic prospects of a suitable scheme being developed within a reasonable period. In particular, the necessary changes reduce the prescriptive elements of the policy requirements, including in respect of the expected form of site layout, and increase the range of potential employment uses that could reasonably be accommodated, as part of an overall scheme for this large and locally important site (**MM 25**). With these modifications, the policy is sound.

73. Considering all of the above, the Plan's overall employment strategy, albeit aspirational and challenging in some respects, is appropriate for the area and deliverable over the plan period, as well as essentially consistent with the NPPF and justified by the available evidence.

### **Matter 5 – Employment Sites (Policies 34 to 37)**

*Issue 5 - Are the proposals for growth and change appropriate and reasonable, including in relation to the NPPF and in terms of environmental, economic and social impacts, and are they clear and deliverable, including in respect of the associated infrastructure requirements ?*

74. Land at Cockerell Road, Corby, amounting to around 9.5 ha, comprises previously developed land and is in a sustainable location within the existing built up area of the town. It clearly has the potential to provide a high quality business park, with appropriate infrastructure and accordingly the allocation in policy 34 for a mix of B class uses is entirely sound.
75. Similarly, about 12 ha of land east of the A45 at Rushden (Land at Nene Valley Farm, Northampton Road) is entirely suitable in principle for new employment provision, sited as it is between the main road and the present edge of the town, with the Nene Valley itself west of the road. As submitted, policy 35 not only requires high quality "landmark" buildings near to the A45 roundabout but also that only "a small percentage" of employment uses other than B1 and B2 would be permitted.
76. Whilst very large scale buildings of any use type would clearly not be appropriate in design terms on this prominent gateway site on the entrance to Rushden from the A45, it was agreed at the examination hearings that there was some scope for greater flexibility regarding both the types of new employment on the site and the scale and nature of the buildings to assist the viability of the overall project. This should facilitate the early delivery of a viable, mixed use but principally employment, scheme and modifications to part f) and a new part g) have been put forward by the JPU accordingly.
77. The former clarifies that it is only the south west part of the site near to the roundabout that performs the gateway function, and therefore where high quality, "landmark" buildings are essential, providing that particular care and attention is also given to the height, scale, massing and form of development on the remainder (new part g) (**MM 35**). In addition, in order to clarify the policy and facilitate implementation, it is necessary to delete the words "a small percentage of" from the first sentence of policy 35, as this is not defined anywhere and is therefore unclear (**MM 35**). Without these modifications, the policy would be unduly prescriptive and a more positive wording is required for soundness.

78. At Kettering North approximately 75 ha of land east of the existing Kettering Business Park is allocated for a major employment scheme comprising B1, B2 and B8 uses. This is based on the necessary preparation of a comprehensive masterplan, the provision of suitable access and infrastructure, incorporating an integrated transport network, as well as mitigation of impacts on local wildlife sites nearby and the setting of heritage assets. The latter relates particularly to the Grade 1 listed Boughton House and its Grade 1 Registered Park and Garden. The policy contains suitably worded criteria to facilitate the above and is sound in all respects.
79. Two parcels of presently agricultural land (A + B) to the south of Kettering are identified as the Kettering South allocation for new employment, adjacent to junction 9 of the A14. Policy 37 allows for the sites to be developed independently, albeit a comprehensive masterplan showing how they would be co-ordinated in due course, including in respect of highway improvements and better connections to the present urban area of Kettering, is required first.
80. Whilst the larger parcel B, south of the A14, west of Burton Latimer and east of the A509, is allocated for all B class uses, the much smaller parcel A, to the north of Isham road and adjacent to Pytchley Golf Course, is restricted to B1 and B2 uses only. Given its size and particularly its location in a prominent position partly on a ridge and also partly forming a gateway to Kettering from the south, it is appropriate that B8 uses are precluded from parcel A due to the potential visual impact of large buildings on this particular site. Moreover, with the nearby allocation of parcel B and the other commitments and allocations in the area there is no particular evidential justification why B8 uses need to be located here, given the above.
81. Indeed, in the light of all of the above, nor is there is any justification or reason for any further significant employment land allocations in this vicinity at present, especially taking into account the level of existing commitments across the area for employment uses. In particular, land around Pytchley Lodge, south of Isham Road and west of the A509, is equally if not more prominent in the local landscape, especially from the south, due to its overall elevation and siting partly on a ridge, than parcel A. It is also of mainly Grade 2 agricultural land quality.
82. Furthermore, its development would be likely to make a major contribution to the coalescence of Kettering with both the villages of Pytchley to the east and Isham to the south. This site does not therefore constitute a more suitable or sustainable alternative than either parcels A or B at Kettering South and there is no necessity for it to be allocated as an addition to meet local or area needs at present, as evidenced in the Employment Background Paper (Jan 2015) (ECO 1). These conclusions are not altered by the planned construction of the A509 Isham by pass in the near future.
83. In common with housing, the selection of employment sites for allocation in this Plan is suitably explained and justified in the various versions of the Strategic Sites Background Paper (SAP2, SAP 4 + SAP 5), as well as in the SA (SUB 11). All together the JPU's evidence clearly and robustly identifies that, given the acknowledged current over supply of B use class employment land across the plan area, additional sites further to those allocated in the Plan are simply not required at present, albeit those of a non-strategic scale may also

be considered in the Part 2 LPs and/or Neighbourhood Plans in due course. Moreover, each of the allocated sites has at least reasonable prospects of delivery, with developers actively involved in most instances, over the plan period, and are also considered to be essentially viable currently. None are in unsatisfactory and/or unsustainable locations such that they should not be progressed and alternatives sought instead.

84. Additionally, the range of size, type and location of sites available across the area is sufficient to provide reasonable choice for prospective occupiers, in all B class uses. In such circumstances, further alternative or additional strategic employment land allocations are not presently required to meet local needs. This includes at Prospect Park at Wellingborough (see also Matter 12).
85. Accordingly, it is not strictly necessary to assess in any detail the particular benefits and dis-benefits of any of the "omission" sites put forward by representors in this report. However, I am satisfied that the assessment of strategic employment sites evidenced in the three iterations of the Strategic Sites Background Paper (SAP 2, SAP 4 and SAP 5) and the SA (SUB 11) demonstrates that none of the promoted omission sites is a more sustainable option in principle than the employment sites allocated in the Plan. Furthermore, it is relevant to record that, in any event, sites on the edge of Northampton would not accord with the overall Plan strategy of focussing development first on the Growth Towns and then on the Market Towns in North Northamptonshire, for this plan period at least.
86. In Corby, Kettering, Wellingborough and East Northamptonshire, taken together with existing commitments and the effects of other policies, the sites identified in this Plan should be more than sufficient in overall terms to meet the number of jobs sought in policy 23, particularly when other sources of new jobs in non B use classes, such as retail, leisure, education and other public services, are also taken into account. Therefore, the proposals for growth in policies 34 to 37 inclusive and the site allocations are justified by relevant and robust evidence and are appropriate, reasonable and deliverable, and thus sound.

## **Matter 6 – Retail and Town Centres (policy 12)**

*Issue 6 – Does the plan make appropriate provision for the growth of retail centres, focussing on higher level centres to provide a suitable strategic framework and is the policy consistent with the NPPF and/or justified by clear and robust evidence in the local context ?*

87. In accord with the NPPF, policy 12 seeks to support the vitality and viability of town centres by maintaining a vibrant mix of commercial uses, improving the public realm and encouraging housing on appropriate sites, including in space above shops. It also identifies a network and hierarchy of centres, with Kettering as the largest in terms of comparison shopping floorspace, followed by Wellingborough, Corby and Rushden. This acknowledges the influences of Northampton, Leicester and Peterborough on the area, as well as that of the new Rushden Lakes out of centre development, that is expected to open in Spring 2017, on Wellingborough and Rushden in particular.
88. In the light of the above the plan's retail strategy makes provision for

additional retail floorspace to serve the northern part of the area in Corby and Kettering town centres. In contrast, for the southern part, with Rushden Lakes taking up all of the forecast increase in retail expenditure until at least 2026, the focus for Rushden and Wellingborough is on consolidating, adapting and diversifying their centres so as to operate successfully alongside it. This is a logical and pragmatic approach that makes appropriate provision for retail growth over the plan period, based on the plan's up to date evidence base in the Retail Capacity update (ECO 2) (Oct 2014).

89. Nevertheless, some clarifications are necessary to the policy and its supporting text to confirm that the Rushden Lakes scheme is likely to provide opportunities for tourism based businesses to benefit from increased visitors (**MM 7**) and that once it has been opened and trading patterns have "bedded down", it will be necessary to monitor its impacts and review the need for any additional retail floorspace in the southern half of the plan area (**MM 8**).
90. Parts of the policy 12 wording also need to be modified to make it clear that it is town centre uses that are to be supported in the centres of Market Towns (part f) (**MM 9**), and that part g) of the policy concerning the application of the sequential and impact tests in paras 26 and 27 of the NPPF relates to retail and other town centres uses that are proposed outside defined boundaries (**MM 10**). With these modifications policy 12 is sound.

### **Matter 7 – Rural Areas (policies 13 and 25)**

*Issue 7 – Does the plan provide too little or too much development in the rural areas and is the categorisation of settlements suitable and appropriate ?*

91. The Plan's overall spatial strategy seeks to sustainably focus growth within and around urban areas and generally protect the countryside from unnecessary development, in accord with the NPPF. As referred to above in relation to the distribution of new housing, this concentration on existing towns and a series of deliverable SUEs represents the most suitable and sustainable strategy for the area over the plan period. Accordingly, levels of new development envisaged in the smaller settlements and rural areas generally are essentially appropriate in all the relevant local circumstances and do not need to be increased to help meet objectively assessed needs locally.
92. Any alternative plan that materially increased the amount of growth directed to the rural area would be generally less suitable, in my judgement. In particular, it would not be a more sustainable strategy for the plan period, given the inevitable diversion of both public and private resources away from the provision of infrastructure and facilities to serve the much larger populations of urban areas, as well as materially increasing, rather than reducing the overall need to travel.
93. The settlement hierarchy of growth towns, market towns and villages has emerged from extensive consideration and consultation during the plan preparation process. It represents a straightforward approach to guide each of the constituent Councils making up the JPU in the preparation of their Part 2 LPs, which will put "flesh on the bones" of the overall policy approach with regard to individual settlements. It does not impose any form of blanket restriction on new housing (or employment) growth as such in villages, but

rather provides the necessary definition and scope for LP Part 2s, and/or Neighbourhood Plans, to be brought forward by local planning authorities and/or local communities.

94. In respect of the former, this may include further, more detailed, definition of the settlement hierarchy, if appropriate, based on specific local evidence and circumstances, such as the links and relationships between individual towns, villages and other settlements. In the light of all of the above, there is no evidential justification for any modification to the categorisation of settlements in this Part 1 LP. Any alleged detailed inaccuracies in relation to smaller towns and villages are able to be addressed in Part 2 LPs.
95. Nevertheless, it is acknowledged that some limited development continues to be justified in the rural areas to help meet locally identified needs, particularly for employment, services and/or affordable housing. Accordingly, policy 13 provides an appropriate mechanism for the consideration of rural exception schemes for affordable housing and the special circumstances relating to new accommodation tied to employment that requires a countryside location.
96. However, some rewording of the submitted policy is necessary to clarify the potential role of associated market housing, where essential for viability, for consistency with national policy in the NPPF (paras 54/55) and that any such schemes should adjoin existing settlements (**MM 11**). Further clarification of the second part of the policy, dealing with proposed dwellings in the open countryside, is also required to facilitate implementation and make it clear that functional, financial and viability tests must all be met (**MM 11**). With these modifications, policy 13 is sound.
97. As with housing, the Plan recognises that the rural areas have a continuing role to play in terms of the local economy and that some businesses and operations have to be located in the countryside. Consequently, policy 25 provides general support for rural economic development that is of an appropriate scale for the location and respects the environmental quality and character of the area. This includes agricultural and related land based activities, as well as tourist and visitor facilities in suitable rural locations. Limited rewording of the policy is necessary to clarify the above, including that rural diversification does not just relate to farming activities, to be more consistent with national policy in the NPPF (para 28) (**MM 23**). As modified, the policy is sound.

### **Matter 8 – West Corby SUE (Policy 32)**

*Issue 8 - Are the proposals for growth and change in this area appropriate and reasonable, including in relation to the NPPF and in terms of environmental, economic and social impacts, and are they clear and deliverable, including in respect of the associated infrastructure requirements ?*

98. A site of approximately 290 ha in total on the western side of the existing built up area of Corby and separated from it by the main A6003 road is allocated in the Plan as a SUE, having been previously confirmed as a suitable "broad location" through the examination of the 2008 Core Strategy. It principally comprises a plateau of largely agricultural land between the Welland Valley to the north and Harper's Brook to the south with some blocks of woodland,

notably in the south west corner. The Plan identifies that in addition to new housing, it is suitable for and capable of providing at least 2,500 new jobs locally. Moreover, this would be accompanied by new education, local retail, leisure, social, cultural, community and health facilities, together with significant green infrastructure, to meet the needs of new residents and create a sustainable new community, with reasonable links to Corby and its town centre that are readily capable of further significant improvement.

99. Whilst representing a significant expansion of the town onto greenfield land beyond the A6003, which has previously been seen as the western boundary of its built form, all the relevant technical work undertaken by the JPU and others, including in the SA/SEA and by the site promoters, confirms that it is a suitable and sustainable location for new development. This is on the basis that, with the provision of multiple pedestrian and cycle accesses across the main road, as well as a new bus service to the centre of Corby, forming part of the comprehensive masterplan properly required in policy 32, the site is capable of providing a sustainable, mixed use, extension to the town.
100. The most up to date viability evidence (October 2015) (PC 1B) also concludes that, based on currently available information, the level of new infrastructure required should prove to be viable and deliverable. This includes an integrated transport network incorporating road improvements to the nearby junctions on the A6003 and at junction 7 of the A14 further afield, as well as elsewhere in Corby. Moreover, the involvement of two national house builders, keen to invest and confident of the overall viability and deliverability of the scheme over the plan period, reinforces this conclusion.
101. The most recent transport modelling undertaken by NCC Highways has confirmed that a total of "around 4,500", rather than "at least 4,000", new homes can be accommodated in traffic terms through the improvements envisaged as part of the overall scheme, which are reasonably and realistically deliverable, in addition to the other elements of the scheme, such as the new employment land. Accordingly, part a) of the policy needs to be modified to more accurately reflect this larger capacity to say "the delivery of around 4,500 dwellings..." (**MM 32**).
102. Representations relating to the land to the north of the identified SUE site argue that the area allocated should be significantly extended. It is said that this would enable the provision of a second main access to the site from the A427 to improve connectivity and also the level of new employment provision by potentially enhancing its prospects and attractions to the market through direct road frontage in this alternative location, thus assisting the overall viability of the scheme, as well as the timescale of delivery.
103. However, the detailed work done to date towards the creation of a comprehensive masterplan indicates that there is no necessity for an additional main access onto the A427 in highway terms, or for other access or connectivity reasons in respect of links between the proposed SUE and the present built up area of the town. Nor, taking into account the other land allocations in the Plan, especially those in and around Corby itself, is there any requirement for an extension of the site to help meet local needs for new housing and/or employment, in the short and medium terms at least.

104. Nevertheless, in order to safeguard the future prospects of the land to the north beyond the present plan period, it is necessary to avoid doubt and to assist implementation that part i) of policy 32 is modified to refer to "all of the" land between the allocated site and the A427, in respect of the requirement for securing comprehensive integration and potential connectivity as part of the masterplan (**MM 33**).
105. In all other respects, including regarding necessary services, such as water supply and drainage, it is effectively common ground that all existing capacity limitations are capable of resolution at reasonable cost as part of the total, mixed use, scheme and there is no firm evidence to indicate otherwise. Therefore, I conclude on this issue that the proposals for this SUE are clear, appropriate and reasonable and that they are likely to prove deliverable over the plan period, without the need to expand the allocated area to the north to assist viability and connectivity. Accordingly, subject only to modifications MM 32 and MM 33, policy 32 is sound.

### **Matter 9 – Rushden East SUE (Policy 33)**

*Issue 9 - Are the proposals for growth and change in this area appropriate and reasonable, including in relation to the NPPF and in terms of environmental, economic and social impacts, and are they clear and deliverable, including in respect of the associated infrastructure requirements ?*

106. As part of the overall spatial strategy for the area, Rushden is now designated as a growth, rather than just a market, town, albeit Higham Ferrers lying contiguously to the north retains the status of a market town. This relates partly to the existing level of services and facilities available, soon to be extended by the Rushden Lakes out of town retail centre, as well as to the potential opportunities for sustainable expansion of its present built form.
107. Accordingly, a broad location considered suitable in principle for new, mixed use, development has been identified on fairly flat and principally agricultural land east of the A6, which has formerly been considered as the boundary of the urban area in this direction. It has derived from numerous detailed technical studies, including the Rushden East Landscape Character Assessment and Capacity Study (SAP 7) (Dec 2014), which was based on a nationally recognised methodology. This and other documents (such as HOU 10, SAP 1, SAP 3 and SAP 6, as well as SCG 2 - Oct 2015) provide an extensive and robust evidence base and audit trail justifying the proposals in policy 33 of the Plan regarding a new SUE at Rushden East. Taken together, they demonstrate that its selection as a sustainable location for new housing, employment and related development over the plan period to 2031 and beyond, is essentially sound and in accord with NPPF policies.
108. However, as a broad location only at present, it is essential that detailed boundaries for the SUE are defined through a masterplan process, as referred to in paras 10.31 and 10.32 of the Plan, as well as policy 33 itself. The masterplan will need to take into account not only the Higham Ferrers Neighbourhood Plan (made on 11 April 2016) which now forms part of the development plan for the area, but also that the A6 currently forms a significant barrier between the site and both Rushden and Higham Ferrers.



109. This has potentially significant implications for the future character and usage of this stretch of main road if suitable connectivity and sustainable links are to be satisfactorily provided to serve the needs of new residents, as well as other uses, such as employment. The available evidence indicates that both HE and NCC Highways, as well as the prospective developers, are content that this can be achieved at reasonable cost, as part of a comprehensive package of transport measures, including a new bus service through the site and walking and cycling links to existing facilities, notably Rushden town centre.
110. Even with detailed boundaries yet to be confirmed, as referred to above, it is clear that the scale and nature of the land potentially available is such that, taking into account the need for a range of size and type of housing, consistent with policy 30 in particular, the upper end of the range of 2,000 to 2,500 new homes identified in the Plan, plus about 12ha of employment land, should prove to be readily achievable. Bearing in mind the level of need for affordable housing, it is necessary for clarity and to assist implementation for all concerned that the policy wording is modified to refer to "around 2,500" dwellings (**MM 34**). Based on the latest viability evidence (PC 1B) (Oct 2015), this should also make a positive contribution to the overall viability of the project, thereby assisting its delivery, albeit considerable work remains to be completed in respect of the costs of the necessary services, facilities and other infrastructure for the SUE.
111. Some representors have queried the delivery of this scheme, not only in terms of the total provision of new homes within the plan period but also regarding the likely start date, given the recent lead in times for other SUEs in the area, as well as the prospective build rates envisaged in the JPU's evidence (SCG 2) (Oct 2015). Whilst first completions in 2020/2021 is likely to prove challenging, government funding for necessary improvements to the Chowns Mill roundabout, at the junction of the A6 and A45, has already been agreed and a concept masterplan is in preparation by a full consultant team appointed by two major national house builders, who are seeking to progress the project.
112. Although a project level Habitats Regulations Assessment is likely to be required for the scheme, mechanisms to address mitigation in respect of the Upper Nene Valley Gravel Pits SPA are already in place relating to other sites in the area, so that this is likely to prove to be a resolvable constraint in practice, rather than a "showstopper" as such. Moreover, notwithstanding some detailed concerns expressed by Higham Ferrers Town Council regarding site boundaries and related matters that will need to be considered in the masterplan process, the proposals benefit from a considerable degree of support, in principle, from relevant stakeholders and a relative absence of material objections from interested parties locally.
113. Therefore, I am satisfied that the location at Rushden, near to the Rushden Lakes project, and with reasonably good local services/facilities and links to nearby towns, would be sufficiently attractive to the market to enable delivery of new homes and jobs to take place generally at the levels envisaged, once started at more than one location within the site, albeit the SUE is not expected to be fully completed by 2031 in any event. Consequently, there are reasonable prospects that the prospective timeline towards delivery set out in SCG 2, providing around 1,600 new homes over the plan period, whilst ambitious, should be realistically achievable.

114. Although agreement on all necessary infrastructure to serve the scheme remains to be completed, it is already clear to all concerned, notably NCC Education, that a development of this scale will need to provide land within the site for a new secondary school. This will not only meet the newly arising need, but also help to provide a social hub for future residents, thereby enhancing its potential cohesiveness as a self-contained new community and reduce the need to travel, especially for children across the A6 for education purposes. Thus, part l) of policy 33 needs to be amended to facilitate implementation by deleting the words "potential" and "if required" (**MM 34**).
115. In all of the above circumstances it is reasonable to conclude that the broad location identified in the Plan is appropriate and likely to prove viable for the scale of mixed use scheme envisaged. Subject to the preparation of a suitable masterplan, as required by the policy, the available evidence points to the overall impacts of the proposed SUE proving to be positive in practice. The proposals are clear, realistic and deliverable, albeit somewhat ambitious, including in respect of new infrastructure. Accordingly, subject only to MM 34, policy 33 is sound.

### **Matter 10 – Deenethorpe Airfield (Policy 14)**

*Issue 10 - Are the proposals for growth and change in this area appropriate and reasonable, including in relation to the NPPF and in terms of environmental, economic and social impacts, and are they clear and deliverable, including in respect of the associated infrastructure requirements ?*

116. Notwithstanding the Plan's strategy to sustainably focus new development on the Growth Towns, an exceptional opportunity has been identified at Deenethorpe Airfield in the Rural North of the area to provide a new Garden Village. This would represent an addition to the growth envisaged through the urban oriented spatial strategy, providing an alternative form and location for new housing and related development to that planned in the SUEs, notably in relation to Corby nearby. It would also help to meet local needs arising in the Rural North that might otherwise have to be met in historic market towns and villages, such as Oundle, also nearby, where there are acknowledged relevant constraints to significant expansion of their existing built up areas.
117. The single landownership of the large former WWII USAAF airbase and the intended long term stewardship of the project materially assist the realistic prospects for the delivery over the plan period of an "exemplar" scheme. This would incorporate high standards of design, materials and layout as well as generous green spaces and a mix of new homes, including affordable housing, jobs, community services and facilities on a viable basis taking into account the new infrastructure required, such as improved road access and new public transport services.
118. Given its location close to the A43 and A427, with the opportunity to create dedicated cycle and pedestrian links to the North East Corby SUE (Priors Hall and Weldon Park), the extensive areas of previously developed land available and the absence of designated areas of landscape, heritage or biodiversity value on the site, it represents a sustainable project that should be endorsed in principle in the Plan. However, this has to be subject to a number of important criteria being met by specific proposals, as set out in policy 14,

including the preparation of a masterplan and a delivery strategy, amongst other essential requirements. The size of the area available is such that around 1,250 new homes should prove deliverable and the Plan needs to be modified to reflect this fuller scope, so as to assist the overall viability of the project and provide greater certainty for all concerned (**MM 13**).

119. However, it would not be appropriate for a scheme of this scale and nature to be taken forward through a Supplementary Planning Document (SPD) that would not be subject to independent examination or, necessarily, full public consultation and para 5.54 of the text needs to be altered accordingly (**MM 12**); but rather a LP Part 2 or site specific development plan document. In order to ensure that the masterplan assesses environmental impacts fully, it is also necessary to add a reference to historic assets to the first part of policy 14 (**MM 14**). An addition to part f) iii) is also required to refer to self-build housing to reflect up to date national policy/guidance (**MM 15**).
120. The documented work undertaken to date by the promoters, including in respect of collaborative working and consultation with the relevant local planning authorities, parish councils and service providers, also gives significant support for the Plan's assessment that the scheme should prove viable, deliverable and sustainable in overall terms. This is so notwithstanding that detailed build costs, including for services and facilities, notably for new transport infrastructure, remain to be finalised at present.
121. In conclusion the available evidence indicates that Deenethorpe Airfield constitutes an appropriate and sustainable opportunity for the creation of a new community or Garden Village that seems likely to prove viable and deliverable within the plan period, including in terms of the supporting infrastructure needed. Moreover, the anticipated environmental, social and economic impacts, taken in the round, are currently reasonably assessed as significantly positive. Therefore, the proposals for this site in policy 14 are sound, as modified, and consistent with the relevant national policies in the NPPF.

## **Matter 11 – Rothwell North SUE**

*Issue 11 – Are the proposals for growth and change in this area appropriate and reasonable, including in relation to the NPPF and in terms of environmental, economic and social impacts, and are they clear and deliverable, including in respect of the associated infrastructure requirements ?*

122. Land to the north and north west of the market town of Rothwell, amounting to almost 34 ha, is identified for a SUE, providing around 700 new homes, about 3ha of employment land and a local centre. It is bounded by the A6 to the west, from which a new roundabout and strategic road link to the B576 leading north to Desborough will help provide relief to the centre of Rothwell, a local nature reserve to the north and the existing built up area of the town to the south. The site will also provide land (just over 2ha) for the necessary expansion of the local secondary school.
123. Given the limitations of the B576 route, with development proposed east and west of it, and the necessity of providing good links, especially for walking and cycling, between the site and town centre, as well as avoiding congestion as

far as possible during the construction period, it is essential that the scheme proceeds in accord with an agreed masterplan. This should include the provision of the new A6 junction and completion of the road link to the B576 at as early a stage as possible. Moreover, the scale of new development also requires some improvements to J3 of the A14 nearby, as agreed with HE and NCC Highways (**MM 36**).

124. Subject to the above, there is no evidential justification for the delivery of the new housing to be phased over the plan period as such, but rather to proceed in accord with market demand and the provision of the infrastructure of all types necessary to support it. Provided that this includes a multi-functional green space/buffer between the built form of the development and the Rothwell Meadow Local Wildlife Site/Rothwell Gullet, in order to safeguard the biodiversity/environmental quality of the area, as required in policy 38 (as clarified by **MM 37**), there are no known constraints precluding the use of this land as a SUE, in principle.
125. Nevertheless, it is also important for the sustainability of the project itself and the town as a whole that a minimum of 3ha of new employment land is provided as part of the scheme, to provide more jobs locally, as well as a new local centre meeting the day to day needs of new residents, without harming the vitality and viability of Rothwell town centre as a whole. Consequently, the relevant criteria of policy 38 containing these requirements are essential, albeit some rewording is necessary for clarity and consistency with national policy (**MM 37**). Also for clarity and to assist implementation it is now common ground that the area of land best placed to meet the needs of the school is to the west, rather than the north, of its existing site (**MM 38**).
126. The full site is now said to be within the control of a major national house builder with an outline planning application, including heads of terms for a prospective legal agreement to meet the requirements for local services and community facilities, under negotiation. There have clearly been significant previous delays to this scheme coming forward, largely due to the national economic situation, but it is now considered to be fully deliverable by both the prospective developer and the JPU within the plan period, and with an early start envisaged to provide the first new houses in 2017/8. Whilst the latter may well prove to be somewhat optimistic in practice, due to the need for detailed permissions and technical approvals, amongst other things, there is no firm evidence to contradict the above in general terms. Accordingly, the proposals are clear and sound, including in terms of their economic, social and environmental impacts, as well as their infrastructure requirements, and seem very likely to prove deliverable. Subject to the modifications referred to above, the same is true for policy 38.

## **Matter 12 – Housing Omission Sites**

### *Issue 12 – Should the plan allocate alternative/additional strategic sites ?*

127. Taking into account the agreed total new housing figure referred to under Matter 3 and my conclusions that, whilst challenging, this level of development has reasonable prospects of delivery on the allocated SUEs and other sites over the plan period, there is no current need for further allocations or additions/extensions to the already identified areas to assist. Overall, I am

satisfied that all reasonable alternative/additional prospective SUEs across the area that could potentially be delivered up to 2031 and shortly beyond have been subject to satisfactory SA/SEA work during the Plan's progress towards submission. This is evidenced in the three iterations of the Strategic Sites Background Paper (SAP 2, SAP 4 and SAP 5), as well as in the SA (SUB 11). None has proved to be a more sustainable option in principle than the SUE allocations in the Plan in that context.

128. Consequently, the possible benefits and/or dis-benefits of the other sites put forward across the area are effectively either matters to be considered in a future review of this Plan or the Part 2 LPs if of a non - strategic scale. Notwithstanding, it is still necessary to address whether any of the alternative/additional sites proposed by representors would be more suitable than those allocated in the Plan. As an example, land west of Wellingborough does not score particularly well in terms of the SA criteria, with particular concerns evident over potential visual impact from new development there and also regarding separation from the existing built up area.
129. Further major development to the north of Northampton might well assist in bringing forward the delivery of the full A43 dualling sought by NCC through additional financial contributions, but is neither required to meet objectively assessed needs at present, nor consistent with the Plan's overall spatial strategy, which is sound. Such proposals may need to be considered in the long term to help meet the county's needs, but are a matter for a review of this Plan and/or that of the West Northamptonshire JCS to address in due course. Similar conclusions apply in respect of land east of Northampton (and west of Ecton) in Wellingborough district, notwithstanding its relatively sustainable location on the edge of the existing built up area of the town.
130. As referred to above in regard to employment, the site known as Prospect Park on the south west side of Wellingborough has been put forward as an alternative or additional location for a SUE, including potential for around 600 new homes. Although well located in respect of the A45 strategic corridor and with the necessary associated infrastructure seemingly capable of viable delivery alongside development, the site remains subject to unresolved concerns relating to likely traffic generation impacts on the adjoining road network, including the nearby A509 junctions.
131. In particular, new development here would pose a significant threat of coalescence between the present built up area of the town and the village of Wilby, leading to the possible loss of its separate identity. It would also give rise to a materially harmful visual and landscape impact on the currently undeveloped character and appearance of the otherwise largely rural setting on this side of the town. In such circumstances this is not a more suitable or sustainable option than the SUEs allocated in the Plan, nor is its development necessary to meet local needs at present.
132. For all other sites of a non – strategic scale their levels of potential new housing delivery would not be so significant as to affect the Plan's overall spatial strategy. Nor would they make a major individual contribution to meeting any possible future shortfall against the revised housing trajectory, should it arise through monitoring. Accordingly, the future of such sites is essentially a matter for the Part 2 LPs to consider in the context of all

reasonable and realistic options for meeting identified needs, including for Market Towns and Rural Areas, as well as for individual settlements such as Burton Latimer, where new market housing has been successfully delivered over the last few years. Therefore, as things stand, there is no necessity for the Plan to allocate additional or alternative strategic sites for new housing.

### **Matter 13 – Transport (Policies 15 to 18) and Infrastructure (Policy 10)**

*Issue 13 i) – Is the transport strategy consistent with the NPPF and the Local Transport Plan and are the schemes proposed viable and deliverable in the forms and the timescales proposed ?*

*Issue 13 ii) – Is the necessary public and private sector finance likely to be available to deliver the infrastructure required on the strategic sites and elsewhere in the area ?*

133. The Plan's transport policies have been properly informed by the Northamptonshire Transportation Plan (NTP) (TRA 6) (March 2012) and its Major Roads Strategy (TRA 4) (Dec 2013), with challenging targets for modal shift and reducing the overall need to travel, particularly through the design and layout of the SUEs, which will provide most new development in the area over the plan period. They are intended to give priority to sustainable means of travel, walking, cycling and public transport, as well as maximising opportunities to access jobs, services and facilities as locally as possible.
134. Policy 15 seeks to enhance connectivity within and around settlements, including from the edge of towns to their centres and so as to help integrate new developments into existing built up areas, in accord with the NPPF (e.g. paras 29, 30, 32 and 35). In a wider sense, policy 16 looks to strengthen links between the towns in the Northamptonshire Arc Transit Network, especially through improved public transport, including multi modal interchanges at rail and bus stations. Part d) of the policy lists the road schemes needed to facilitate delivery of the strategic sites, with the majority to be funded by development, as endorsed by NCC Highways.
135. In relation to strategic transport connections, which include the A14, A43, A45 and Midland Main Line railway routes, policy 17 and supporting text reflects the priorities agreed with HE, NCC, the two Local Economic Partnerships and other local authorities to ensure that the planned growth can be suitably, safely and sustainably accommodated in terms of transport infrastructure. This includes not just the upgrading of rail services to increase capacity and improved bus services, but also five significant road schemes from the Major Roads Strategy in the NTP, on the above routes, as well as the completion of the M1 J19 project.
136. The A43 between Northampton and Kettering is a key link across the county and NCC aims to provide full dualling. However, it is now recognised that this is not likely to prove viably achievable during the plan period. The Plan therefore needs a modification to para 6.32 (**MM 16**) to update information on the current position regarding planned improvements, for clarity.
137. The area's importance for the logistics sector and its current and projected contribution to the local economy means that safe, suitable and secure HGV parking facilities are required to serve the strategic road corridors across the

county. Policy 18 seeks to address the shortfall and meet future needs by providing a set of appropriate criteria to assist site searches and against which new proposals may be assessed, in accord with para 182 of the NPPF. In the light of all of the above and subject only to MM16, I am satisfied that policies 15 – 18 are consistent with the NPPF and the NTP and sound.

138. Section A iii) of the Plan and policy 10 in particular recognise the importance of the timely provision of the necessary new infrastructure in support of the proposed growth, including physical schemes, social/community facilities and services and green spaces. The Infrastructure Delivery Plan (IDP) (TRA 1 & 1a) (Jan & Nov 2015) suitably identifies the key infrastructure elements required to implement the plan's proposals, as well as its broad phasing and likely funding sources, in the context of a co-ordinated approach to delivery with key agencies, such as Highways England (HE) and the County Council (NCC). This includes relevant strategic transport projects, such as Corby rail services, road improvements on the A14, A43 and A45 routes and funding for the Broadholme STW improvements from Anglian Water, as well as avoiding adverse effects on the Upper Nene Valley Gravel Pits SPA.
139. In terms of funding, the JPU's evidence is clear that many of the key strategic infrastructure projects are already included in the spending plans of the relevant agencies, including Network Rail and HE, as part of the government's Roads Investment Strategy (TRA 11). Others (e.g. A45 Stanwick to Thrapston dualling) are clearly identified as priorities for the next investment period.
140. The projects included in the Plan are also based on the NCC's strategic transport priorities. Some funding has already been secured through the Growth Deal for the A509 Isham by pass and the first phases of the A14 route improvements, with more schemes to be sought in future rounds, as part of the innovative NCC funding arrangements that are already underway. Taken together with the Government's provision of funds for a Joint Delivery Unit to oversee implementation of the plan's proposals, I am satisfied that the relevant policies and existing commitments are sufficient to conclude that the public and private sector funding to deliver the necessary infrastructure is likely to be available. Accordingly, the policies and proposals are also sound in this respect, including in terms of the overall viability of the necessary schemes and they should prove to be deliverable over the plan period.

#### **Matter 14 – Monitoring and Implementation (Section D)**

*Issue 14 – Will the proposed monitoring be sufficiently comprehensive and are the implementation mechanisms sufficient and suitable to achieve their objectives, including in relation to the strategic sites, and are they likely to prove effective in practice?*

141. In terms of infrastructure and implementation, Table 8 of the Plan sets out the key strategic projects needed to ensure that its objectives are met and the overall outcomes sought achieved, including in regard to the delivery of the SUEs. Inevitably, some matters have progressed since the Plan was submitted, including in terms of the sources of funding, and it is therefore appropriate that Table 8 should be updated, where necessary, through the modifications process (**MMs 39/40**). With these amendments the list of key strategic projects important to the delivery of the Plan is sound and properly

reflects the current position of each, in accord with guidance from delivery partners, including HE and NCC.

142. The Policies Map is not a statutory development plan document and therefore I do not recommend MM42 put forward by the JPU as a main modification. However, in order to comply with the legislation and give effect to policy 4, as modified (**MM 2**), and to implement the approach now set out in para 3.40 of the Plan, relating to site specific wintering bird surveys on any sites of 2ha or more within 4km of the Upper Nene Valley SPA, it will be necessary to update the Policies Maps accordingly.
143. Given that new housing completions in the area have not met the levels anticipated in the CSS since 2008, albeit largely for economic reasons relating to the recession and beyond the control of the JPU, it is essential that this Plan is subject to suitably detailed monitoring over the plan period. This is particularly so in the early years following adoption and in respect of the delivery of new homes and also employment land/buildings. It is reinforced by the challenging targets in the Plan, especially for the SUEs, so that appropriate action can be taken at as early a stage as possible, in the event that delivery on one or more of the SUEs does not meet the expectations incorporated into a revised and updated housing trajectory that more accurately reflects current circumstances and realistic delivery targets over time. This should be provided as part of a new Appendix to the Plan (**MM 44**). The purposes of the new housing trajectory include that housing land supply at the SUEs should be measured against it, rather than just the simple annualised target, over the plan period. There would be little point in having the trajectory otherwise. For clarity, the 75% monitoring trigger for the SUEs (**MM 27**) should also be added to the monitoring table on page 202 (**MM 41**).
144. There are no caps or upper limits as such on the housing numbers, subject to compliance with policies in the Plan, nor are there any specific phasing restrictions on the delivery of any of the SUEs. Therefore, there may be scope for some to come forward more quickly than presently envisaged if problems not previously foreseen arise relating to implementation on any particular one. Thus, whilst further non-strategic scale allocations in Part 2 LPs and/or Neighbourhood Plans and/or new permissions on currently unallocated sites may have to be brought forward to address any significant shortfall should it arise, there is no necessity for this to be specifically referred to in the Plan's policies or for particular "reserve" sites to be identified, at present, but rather in the monitoring section of the Plan.
145. Therefore, as part of future monitoring, it is important that the Plan sets out an appropriate mechanism(s) to be put in place in the event of a significant shortfall arising, for whatever reason(s). This needs to provide what was usefully described by one participant at the examination hearings as, "a better plan B", if problems arise in the future, to ensure that sufficient flexibility is available, if required. Following detailed and constructive discussions at the examination hearings, the JPU proposed an addition to Table 9 (Performance Indicators and Targets for Monitoring) to introduce a "trigger" of a 25% buffer in respect of each LPA's new housing requirement on an annual basis (as set out in Policy 28). If not available this would act as an early warning that specific action is required to address an imminent shortfall against the rolling 5 year housing land supply requirement.



146. Whilst obviously yet untested, such a mechanism should prove sufficient to ensure swift action by each and every Council to which it applies. This is not least because the relevant policies of the NPPF relating to the absence of a rolling 5 year housing land supply will apply immediately to new proposals on non-allocated sites if not. With this addition (**MM 41**) to Table 9 the proposed monitoring of the Plan should be sufficiently comprehensive and help to achieve the Plan's objectives regarding new housing delivery.
147. In order to facilitate the operation of the monitoring "triggers" and to ensure that monitoring starts from a satisfactory base, it is essential that the Plan includes not only as up to date as realistically possible figures for the present position in each Council area, but also the cumulative picture, albeit a snapshot at one moment in time, across the whole area. Accordingly, so that the Plan's implementation mechanisms are fit for purpose, it is necessary to include additional information as Appendix 4 of the Plan (**MM 44**).
148. This includes in Annex A the current housing land supply position in each of the individual LPA areas and also the totals across North Northamptonshire, as well as in Annex B a new housing land supply trajectory for the whole area. Subject to these modifications the implementation mechanisms in the Plan should prove to be suitably extensive to achieve the objectives and thus be effective in practice, including in relation to the SUEs.
149. In the event that any material errors or omissions in the detailed figures should come to light, there is not only the 25% buffer to be monitored on an annual basis to act as a "trigger" for action ("a better plan B") but also the opportunity to address any shortfalls that might emerge, either through delays in bringing forward or building out the SUEs or for any other reason, in the Part 2 LPs and/or Neighbourhood Plans through additional site allocations on a non-strategic scale. Taking this into account both the proposed monitoring and the anticipated implementation of the Plan is sound and that, as at February 2016, each of the constituent Council areas has been able to satisfactorily show that a deliverable rolling 5 year housing land supply exists at present.

## Assessment of Legal Compliance

150. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The JCS is identified in the approved North Northamptonshire Joint Committee LDS Update of April 2015, which sets out an expected adoption date of early 2016. The JCS's content and timing are compliant with the LDS, albeit adoption will be slightly delayed until mid 2016, due to the need for a main modifications process.
Statement of Community Involvement (SCI) and relevant regulations	The Joint Planning Committee's SCI was adopted in November 2013 and also by the Borough Council of Wellingborough and Corby Borough Council in January 2014, Kettering Borough Council in February

	2014 and finally East Northamptonshire Council in December 2014. Consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA (SUB 11) (June 2015) has been carried out, including in relation to the post submission main modifications, and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Report of January 2015 (SUB 13) and Addendum of June 2015 (SUB 14) have been carried out and are satisfactory.
National Policy	The JCS complies with national policy, except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The JCS complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

151. **The Plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues above.**
152. **The Joint Committee has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the North Northamptonshire Joint Core Strategy Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

***Nigel Payne***

Inspector

This report is accompanied by the Appendix containing the Main Modifications