1 Purpose of Report
1.1 To seek approval for the adoption of the Public Art Supplementary Planning Document (SPD) following the consultation period.
1.2 This paper supports the following Council aims:
   (a) Mission Statement: Democratically elected Members and the Staff of the Borough Council will work together with and for local people and organisations to ensure the effective use of resources in fostering and maintaining economic prosperity, cultural enrichment and environmental stewardship of the Borough.
   (b) Economic and Environment Service Plan 2004-05: “To promote and enhance the Borough’s identity as a visitor attraction and business location through the development of tourism activities and inward investment promotion.”
   (c) Spatial Planning Service Plan 2005-06: To provide a rational and consistent basis for the promotion and control of development in the Borough on the basis of economic security, social equity and protection of the environment.

2 Background
2.1 Please refer to the previous report submitted to the Economic & Environment Committee on 9th February 2005 (point 4 in the minutes).
2.2 The Public Art Supplementary Planning Document was discussed and approval given for the consultation period.

3 Discussion
3.1 The draft SPD was subject to consultation undertaken by the Arts Development Officer between 14th February and 26th March 2005.
3.2 Responses were received from Northamptonshire County Council, CABE, Government Office for the East Midlands, Castlemore, Wellingborough Civic Society & four anonymous responses from public feedback events. Feedback and responses have been incorporated in the SPD (attached).
3.3 A ‘Public Art Plan’ will be researched and written in the future to further expand on the SPD.

4 Legal Powers
4.1 Section 145 of the Local Government Act 1972

5 Financial Implications
5.1 Arts Development budget commitment during 2005/06 for promotion and activities.
Risk analysis and Implications

The SPD provides guidance and promotes good practice thus aiming to reduce risks during public art projects.

There is a limited risk that the press may enter into a debate on the value for money of public art however the information included in the SPD and collated during the consultation demonstrates that many recognise the value and potential of the art form. The Public Art Plan research will provide baseline data which could then be used in response to any press queries.

6.1 Implications for Staffing
   (a) Arts Development Officer & Planning Officer time.

6.2 Implications for Sustainable Development
   (a) The SPD has undergone a Sustainability Appraisal and aims to promote sustainable ways of working.

6.3 Implications for Equal Opportunities
   (a) The SPD follows equal opportunities principles.

6.4 Implications for Community Safety
   (a) The SPD encourages developers to consider community involvement in public art projects which could impact positively on elements of community safety.

6.5 Implications for Health Improvement
   (a) The SPD encourages developers to consider community involvement in public art projects which could impact positively on elements of health improvement.

6.6 Implications for Property
   (a) None

7 Recommendations

7.1 That approval be given for the adoption of the Public Art SPD.

8 Author and Contact Officer
8.1 Paula Armstrong
   Arts Development Officer

9 Consultees
9.1 Sue Bateman, Planning Assistant, Environmental Services
9.2 Bob Entwistle, Director of Technical and Leisure Services
9.3 Roy Pulling, Head of Spatial Planning
9.4 Liz Flores, Recreation Manager

10 Background Papers

10.1 Public Art SPD: A Guide to Good Practice including:
   Adoption Statement
   Community Involvement Statement: Appendix A
   Sustainability Appraisal: Appendix B
   Feedback and Responses Table: Appendix C
Adoption Statement:
SPD adopted on 26th July 2005
Any person aggrieved by the SPD may apply to the High Court for permission to apply for a judicial review of the decision to adopt the SPD.
Any such application for leave must be made promptly and in any event not later than 3 months after the date on which the SPD was adopted.
PUBLIC ART - A GUIDE TO GOOD PRACTICE
SUPPLEMENTARY PLANNING DOCUMENT

1.1 PURPOSE OF DOCUMENT

This document has been prepared by the Borough of Wellingborough Council to provide guidance and examples of good practice for the development and commissioning of public art in relation to developments in the Borough. The guidance expands on Policy G16. It is aimed at developers, architects/architectural technicians and businesses of the Borough to help when planning public art by identifying key points to consider in order to achieve a successful public art project. These principles are relevant throughout the Borough.

1.2 STATUS OF DOCUMENT

This is the final document that, following agreement, will be adopted as a Supplementary Planning Document (SPD) forming part of the new Local Development Framework (LDF).

LDFs are intended to streamline the local planning process. The key aims of the new system are:

i) Flexibility – enabling local planning authorities (LPA) to respond to changing local circumstances;

ii) Strengthening community and stakeholder involvement in the development of local communities;

iii) Front loading – LPAs should take key decisions early in the preparation of Local Development Documents (LDDs);

iv) Sustainability appraisal – to ensure that LDDs are prepared with the objective of contributing towards sustainable development;

v) Programme management – efficient management of the programme for the preparation of LDDs in accordance with the local development scheme (LDS); and

vi) Soundness – LDDs must be based upon a robust, credible evidence base.

The key documents which form part of the LDF are illustrated in figure 1.1.
Supplementary Planning Documents (SPDs) should be included in the LDF and will form part of the planning framework for the area. They will not be subject to independent examination and will not form part of the statutory development plan. However, they should be subject to rigorous procedures of community involvement. SPDs may cover a range of issues, both thematic and site specific, which may expand policy or provide further detail to policies in a Development Plan Document (DPD).

The process of preparing an SPD requires that a sustainability appraisal (Appendix A) and a statement of community involvement (Appendix B) also be prepared. The sustainability appraisal was completed using the sustainability framework developed to help the process of assessing projects for sustainability issues. The appraisal for this SPD was discussed and jointly completed by the Sustainability Officers Group at the Borough Council of Wellingborough.

The draft SPD was subject to consultation from 14th February until Saturday 26th March 2005.
A series of other Guidance Notes is available which may also be relevant to your proposal:

<table>
<thead>
<tr>
<th>ADOPTED SPGS</th>
<th>DATE ADOPTED</th>
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<tbody>
<tr>
<td>SPG I: Trees on Development Sites</td>
<td>April 1999</td>
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<tr>
<td>SPG III: Mobility Housing</td>
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<td>SPG IV: Planning Out Crime in Northamptonshire</td>
<td>February 2004</td>
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<td>SPG V: Parking</td>
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<td>SPG VI: The Conversion of Farm Buildings</td>
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<td>SPG VII: Scheduled Ancient Monuments, Sites of Special Scientific Interest and Ancient Woodlands</td>
<td>April 1999</td>
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<td>SPG VIII: Building Better Places: How to Contribute to Sustainable Development</td>
<td>April 2003</td>
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<td>SPG IX: Guidance on the Use of Planning Obligations</td>
<td>November 2003</td>
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<tr>
<td>SPG X (A): Wellingborough East Neighbourhood Centre</td>
<td>June 2004</td>
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<tr>
<td>SPG X (B): Station Island Development Brief</td>
<td>June 2004</td>
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<td>SPG XI: Affordable Housing</td>
<td>July 2004</td>
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<td>SPG CA2: Wellingborough Town Centre</td>
<td>22nd April 2003</td>
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<td>SPG CA3: Earls Barton</td>
<td>4th Nov 2003</td>
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<td>SPG CA4: Orlingbury</td>
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2.1 **S106 AGREEMENTS AND PUBLIC ART – ENCOURAGING GOOD PRACTICE IN PUBLIC ART**

2.1.1 The Local Plan includes the following policy in relation to public art:

*Design and Art within the Built Environment*

**POLICY G16**

*PLANNING PERMISSION WILL BE GRANTED FOR PUBLIC WORKS OF ART WHERE SUCH WORKS WILL NOT DETRACT FROM THE CHARACTER OF THE LOCAL ENVIRONMENT.*

2.27. The quality of the built environment is important to the individual character and identity of settlements. The protection of existing buildings of character and open space is important, but new development should also aim to make a positive contribution to the townscape.

2.28. One way of adding interest to the environment is to include works of art in public places eg. sculptures, murals, fountains etc. The Borough Council supports the "percent for art" initiative whereby a proportion of the cost of the development is devoted to providing works of art and will encourage, through its own initiatives and through negotiations with developers, a high quality of design and the voluntary inclusion of art in appropriate public places.
2.1.2 Section 106 of the Town and Country Planning Act 1990 (as amended) provides the legal authority for the drafting of planning obligations between developers and the Council. A planning obligation is a legal agreement between the Council and a developer which requires the developer to carry out certain works or to provide appropriate benefits in connection with a proposed development. The Council will seek to enter into negotiations with developers to secure planning obligations where necessary. Further guidance can be found in SPGIX - Guidance on Planning Obligations available on request.

2.1.3 Delivering Sustainable Development PPS1, says:
“Planning policies should promote high-quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted.” (Key principle (iv) para 13)

2.1.4 Local Development Frameworks PPS12, says:
“Well designed development responds well to the local physical, social and economic context, being safe, clean, attractive and accessible for all users. LDDs should therefore include policies that set out strategic design and access objectives in line with PPS1 and relevant good practice…” (para 1.13)

2.1.5 By Design – Urban design in the planning system: towards better practice (ODPM/CABE 2000) sets out seven design objectives including:

♦ Character
  A place with its own identity
  Planning should promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture.

♦ Quality of the public realm
  A place with attractive and successful outdoor areas
  Planning should promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people.

♦ Legibility
  A place that has a clear image and is easy to understand
  Planning should promote legibility through development that provides recognisable routes, intersections and landmarks to help people and their way around.

2.1.6 Ambitions for the Arts 2003 – 2006 produced by Arts Council England states:

“We will argue that being involved with the arts can have a lasting and transforming effect on many aspects of people’s lives. This is true not just for individuals, but also for neighbourhoods, communities, regions and entire generations, whose sense of identity and purpose can be changed through art.”
2.1.7 The Borough Council of Wellingborough adopted the ‘Arts Plan’ which recognises the importance and value of public art:

“Objective 6. To develop a public art plan
Wellingborough has a history of commissioning works of Public Art and a commitment to the importance of public art within planning procedures on which to build. Public Art can play a significant role in audience, community and arts development. It is visible to all, and at its best, can enhance a space, build identity, a sense of community ownership and pride engaging with the audience and encouraging them to consider their environment. Communities can develop identity through art and express this in the public domain through creative exploration and collaboration promoting awareness and understanding of, as well as celebrating and enhancing the environment in which they work and live.”

3.1 WHAT IS PUBLIC ART?

3.1.1 Public Art is not so much a type of art but more a practice of involving artists or crafts people in the design process for a public space including the conception, development and enhancement for the space. It is the integration of the arts in the process of improving the environment.

“Public art is not an art form, it’s simply a way of improving the changing environment through the arts.”
Quote from www.publicartonline.org.uk

3.1.2 Public Art can take many forms. Most often it refers to works of art commissioned and designed to enhance specific buildings or sites which are accessible to the public and can be sculpture, murals, mosaics, street furniture, paving, fencing, windows, gateways, banners, projected works, events, etc. that can be sited in or out of doors.

“Public art can be static, moving, part of the infrastructure or a projection of light and sound. It can last for a minute, a day, a year or a lifetime.”
Quote from www.publicartonline.org.uk

3.1.3 It can be permanent or temporary, large or small scale and incorporate a wide variety of materials and processes. It will be site specific, considering, reflecting or being inspired by its location.

3.1.4 Within the context of a development, public art will be considered to provide added value and be in addition to the developer’s usual design considerations.
3.2 PUBLIC ART – THE BENEFITS

3.2.1 Public Art is widely recognised as having a broad range of benefits including:

- **Environmental** – regeneration, creation of a sense of place, identity
- **Economic** – encourages inward investment, promotes a sense of confidence and positivity
- **Social** – promotes civic and personal pride, encourages people to rediscover and interact with their environment, social inclusion tool
- **Cultural** – community development tool, raises the profile of the arts in general, offers opportunities for people to participate in the arts

"Our policy will be to promote 100 per cent good design in our public buildings - through the design of the building itself and the green spaces around it or the involvement of artists in the project."

_Culture and Creativity: The Next Ten Years (Pub: DCMS)_

Public art fosters civic pride, creates a sense of fun, makes a place more memorable, stimulates new ideas and contributes to environmental renewal and economic and social development. Through increased involvement in the design process, artists are making a vital difference to the quality of the built environment across the region, and helping to create a 'new' heritage'.

_Sue Kay, Executive Director, Culture South West_

The South West of England Regional Development Agency recognises the important contribution of public art and artists to the creation of a high quality built environment, a vital ingredient of successful economic development.

_Ian Piper, Head of Regeneration, South West of England Regional Development Agency_

3.2.2 Public Art at its best can promote regeneration both geographical and social through the promotion of civic pride and the creation of a sense of place, an identity. It encourages inward investment through the impression of social, cultural and economic confidence.

3.2.3 It encourages the public to look at and interact with their environment in a new way developing a sense of ownership, local identity, personal and civic pride. It helps to create and promote the local distinctiveness.

3.2.4 With community involvement these benefits are especially evident. Opportunities for learning, development of creative skills and broadening the understanding of the arts result from community involvement providing a sense of ownership of and pride in the piece and the space. This encourages people to value their environment contributing to a reduction in vandalism.

3.2.5 When public art is part of a development it is a tool for community development and social inclusion. A well-managed public art project has the potential to bring communities together, allowing them to make decisions and contribute to the development of the artwork.
4. COMMISSIONING PUBLIC ART – GOOD PRACTICE

4.1 When commission public art consideration should be given to:
- Clearly defining the aim(s) of the project – social, economic, environmental aims with consideration to the aims of the Council
- How the artwork fits into the development scheme as a whole
- What partners are needed to effectively deliver the project eg highways authority, schools, community groups, etc.
- Is the work temporary or permanent
- Creating site specific art work
- Who the audience is likely to be
- The inclusion of public participation and involvement for example through workshops, consultation and/or exhibitions.
- How the context of the work may change over time eg. should the project include provision for a future event, celebration, alteration, artistic intervention, etc to continue the aims of the artwork
- Maintaining the highest quality throughout the project
- Hiring only professional artists and/or crafts people (with special consideration to local artists/crafts people)
- Publicity and promotion of the project to further promote community ownership and public understanding of the arts in general
- Consider efficient use of resources and recycled and/or renewable materials
- How the project will be promoted after it has been completed eg. a plaque near a permanent piece of artwork, book published including images of a project, etc.

4.2 Early planning of projects should consider opportunities for commissioning artists and crafts people at the earliest stage. It is now common practice for a lead artist to be part of the design team at the initial stages to help collaboratively identify opportunities for the use of artists within the development rather than setting aside an area for public art. It allows for the creative use of artists’ skills and creative knowledge for imaginative and unique results.

“The work of artists should be integrated into the design process at the earliest possible stage if it is to be used effectively.”
By Design - Urban Design in the Planning System (Pub: CABE/DETR)

4.3 How the project will be managed needs to be established with clear management procedures. This will vary depending on experience, available time, scale of the project, etc. A steering group with representatives of all/some stakeholders (developer, architect, landscape architect, arts development officer, planning officer, a representative of a community group, highways officer, etc) may be the best method of overseeing the project from start to finish.

4.4 One member of the group will act as the commission manager and will be the contact for the artist(s). The key is good communication and being sure all stakeholders have all relevant information.
4.5 An artist’s brief needs to be developed with project aims clearly considered. The brief should include details of the aims, project background, location, budget, timescale and any obligations eg. community involvement, evaluation and/or restrictions.

4.6 Clear selection procedures should be established with artists selected on the basis of criteria included in the artist’s brief. Selection can be made in three ways:

- Direct invitation – an individual artist is invited to submit proposals for the project
- Limited competition – a list of artists is compiled and each directly invited to submit proposals
- Open competition – the project is widely advertised, through local arts networks, in national trade magazines, etc. with submissions invited for interested parties

Open competition is encouraged as the general means of selecting artists.

From the outline proposals submitted a shortlist of 4 to 6 artists can then be either invited to submit more detailed proposals and project plans (a fee of £400 to £500 is usually paid for this stage) or, artists can be invited for interview based on their previous work (a fee of £75 to £150 is paid per interview to cover the artist’s expenses and time).

4.7 A detailed budget should include an income and expenditure breakdown for each stage of the project with consideration given to aspects such as:

- Management costs inc. recruitment and selection
- Artists’ design and commission fee *
- Materials and fabrication *
- Additional consultancy (engineer reports, installation, etc.) *
- Travel *
- Workshop, public exhibition and/or consultation *
- Insurance *
- Installation, transport, security *
- Maintenance (Plan for future years)
- Publicity, promotion, documentation
- Contingency
- Evaluation

* Points in red can be considered part of the artists’ total commission fee which the artist then has responsibility for managing appropriately covering costs for all these aspects.

4.8 A clear time plan should be established at the beginning of the project at the time of signing the contract. This should include details of each step in the design process and be as realistic as possible for both the steering group and the artist.
4.9 Community involvement is encouraged. This could be through consultation processes, workshops, public access to the artist ‘at work’, exhibitions and access to the design process, public representation on the steering group, etc. The aim is to promote a greater sense of community ownership and pride in the artwork discouraging problems such as vandalism, as well as ensuring the work has local relevance. This should not mean more challenging artworks are discouraged but that artists work with communities to inform, explore and promote the work as it is developed.

4.10 All commissioned artists should be issued with a contractual agreement in which the obligations of the artist, developer and council as appropriate are clearly stated. Other issues to consider include background, definitions, indemnities and insurance, building regulations, ownership, artists moral rights, reproduction for promotion, maintenance, defects, termination and disputes.

4.11 Risk assessments should be completed for the various stages in a project including working with the public, workshops, working on site, the sculpture and logistics of installation, long term risks, maintenance, etc.

4.12 Evaluation, monitoring and documentation processes should take place throughout the project and be clearly established from the beginning. This can take the form of questionnaires, comment opportunities, creative consultation, individual feedback, regular meetings with the steering group, photos, video, recordings, etc. This information will inform and help guide future projects and policies.

4.13 Publicity and promotion of the project has a key role to play in promoting a sense of ownership and pride in the artwork and a close relationship with local press can be greatly advantageous for a project. Local publicity raises the profile of the project and arts in general.

4.14 Funding and responsibility for maintenance need to be considered and secured at the earliest possible stages of a project as part of the initial project plans. A maintenance plan can be submitted by the artist including likely costs.

5. ROLE OF THE ARTS DEVELOPMENT OFFICER (ADO)
The ADO is able to offer support and advice to all parties in the commissioning process. This includes:
- Access to examples of good practice in key elements of the process
- Access to local and national arts networks and databases
- Advocacy for commissioning new works
- Developing partnerships, community links
- Working with Planning Officers to endorse final designs as its role as a local planning authority.
Supplementary Planning Document
PUBLIC ART
A Guide to Good Practice

Statement of Community Involvement

The SPD has been written as a result of the development of the Arts Plan for the Borough of Wellingborough in which public art is identified as a possible future strength and the development of public art is one of seven key objectives. The Arts Plan was developed with thorough consultation of residents, local arts practitioners and organisations, venues, schools, parish councils and council staff. The draft plan including this objective was agreed by focus groups and presented to community groups.

Wellingborough Planning Officers were consulted during the development of the draft, as well as referring to example plans and guidance notes written by other local authorities.

The SPD has been written with experiences of Wellingborough public art and current thoughts on best practice born in mind. A current public art project is being managed by Castlemore Securities Ltd having been developed prior to the existence of guidance notes. Castlemore have been consulted on the development of the draft providing the perspective of a developer currently working in Wellingborough.

In accordance with the Principles, the draft SPD will be out for consultation from Monday 14th February until Saturday 26th March 2005. A copy will be distributed to relevant organisations and individuals for comment.

Consultation List
The Countryside Agency
The Historic Building and Monuments Commission for England
Adjoining Local Authorities
Northamptonshire County Council
Parish councils
GOEM
East Midlands Regional Assembly
EMDA
Paul Stinchcombe MP
CABE
Civic Society
House Builders Federation
Bovis Homes Ltd
Individual, Borough based, visual artists (contained on artist’s database)
Wellingborough Art Society
Castlemore Securities Ltd
Arts Council England East Midlands
Victoria Centre
Wellingborough Black Consortium
Winifred Wharton Trust
Appendix A

A feedback form has been designed to facilitate this process. It will include the reasons for the development of the SPD, explanation of how the replies will be taken on board and questions in plain English to facilitate feedback. Further to the physical distribution the draft SPD and feedback form will be included on the web site and the Arts Development Officer will be available to meet with anyone who wishing to discuss the draft. Consultation materials will be made available in other formats such as large print, audio and community languages upon request and the feedback form will include the standard translation text box. The consultation method will be evaluated through a customer satisfaction survey sent with the feedback form.

Advance notice of the consultation will be given on the web site, through posters displayed, press release and letters sent to the consultation list.

Responses will be analysed and appropriately incorporated into the final SPD which will then go to committee for approval in April 2005. A summary of responses will be compiled, distributed to respondents and made available on the web site.
WHAT IS THE SUSTAINABILITY FRAMEWORK?

The Sustainability Framework is a process to help align the activities of the Council with the community and corporate priorities for Wellingborough. Using the Framework will help to ensure that your activity is contributing in the round to addressing the needs of Wellingborough.

The Sustainability Framework is based on the key objectives of the community plan which represent Wellingborough’s local vision of sustainable development covering social, economic and environmental priorities:

- Making our community a safer place
- Making our community prosper
- Make our community healthier
- Making our community a better place to live

Wellingborough Council’s corporate aims and objectives are also embedded in the framework. (These are drawn from the community plan and spell out the council’s contribution to it)

These aims are based around 4 key themes:
A. Economic prosperity (5 objectives)
B. Cultural enrichment (4 objectives)
C. Environmental Stewardship (5 objectives)
D. Effective use of resources (2 objectives)

HOW TO USE THE FRAMEWORK

The Framework is in two parts:
- Section One should be completed by a person with an in-depth knowledge of the issue to be assessed.
- Section Two should be completed in groups of around six people and is estimated to take one hour.

How should it be used?
- A maximum time for the process should be agreed by the group at the start
- As a prompt for dialogue which allows everyone the opportunity to feed in views and enables a consensus to be gained
- To assess a range of strategic activities such as policy, programme and strategy development, service planning and monitoring. It can also be used as a tool to assist cabinet decision-making

Who can use the framework?
- The user groups should be multi-disciplinary and cross-departmental wherever possible
- Elected members of the Council as well as LSP’s and partner organisations.

THE BENEFITS

- Raising awareness of corporate and community aims and objectives
- Stimulating dialogue to generate new ideas
- Helping to encourage joined up thinking and achieve corporate consistency

HOW NOT TO USE THE FRAMEWORK

- The Framework should not be used by one person, as the group discussion is an important part of the whole process
- The Framework is not a tick box exercise - the aim is to stimulate dialogue, generate new ideas and encourage ‘joined up’ thinking
- The results should not be added up to create a score, the process provides an overview of the contribution the activity makes to corporate and community priorities in the round
- The Framework does not make decisions in itself, but instead is a tool to assist decision making

THE CONTRIBUTION SPECTRUM

- (Strong Negative) Has a large negative impact that could directly and significantly undermine the objectives.
- (Negative) Has a negative impact that could indirectly undermine the objectives.
+ (Positive) Has a direct positive impact on the objectives.
+ (Strong Positive) Has a close to optimal positive impact on the objectives.

LINKS TO OTHER ASSESSMENT PROCESSES

- Project plan documents (project bid statements, project initiation documents, project closure statements)
### Section 1  
This section should be completed by the person(s) responsible for the proposal

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<th>What are you proposing to do?</th>
<th>Establish SPD for public art projects initiated as part of S106 agreements</th>
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<tr>
<td>Why are you proposing to do it?</td>
<td>To facilitate future projects, provide advice notes, encourage developers to be more involved in the process</td>
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<td>What are the measures of success?</td>
<td>Numbers of successful public art projects initiated through S106 agreements</td>
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<td></td>
<td>Increased level of developer involvement in projects</td>
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<td>Numbers of developers volunteering to include elements of public art</td>
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<td>What delivery mechanisms are being used?</td>
<td>S106 procedure</td>
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<td>Planning conditions</td>
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<td>Pre-application advice</td>
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<td>Who is best placed to deliver?</td>
<td>Planning Officers</td>
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<td>Arts Development Officer</td>
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<td>Partnership working</td>
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<td>What lessons have been learnt from previous activities?</td>
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### Appendix B

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<td>Review as part of Arts Plan review process</td>
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<th><strong>What arrangements are in place for monitoring and evaluation?</strong></th>
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<td>Review process</td>
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<td>Risk – the document doesn’t achieve its aims, is misleading or unclear</td>
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</tr>
<tr>
<td>Consultation process</td>
</tr>
<tr>
<td>Cross-disciplinary officer group review (SOG)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Will the activity impact unevenly on people or places?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes. The SPD will be relevant only to new developments over 10 dwellings (as detailed in S106 process)</td>
</tr>
<tr>
<td>Other parties interested in using public art would be offered the SPD as guidance to good practice</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>What are the long-term implications?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategic approach to public art following examples of good practice</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>What are the international implications?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Encouraging the development of an interesting and distinctive environment seen by international visitors</td>
</tr>
</tbody>
</table>
### Appendix B

**Section 2: This section should be completed in groups of approximately 6 people**

<table>
<thead>
<tr>
<th>Borough Council of Wellingborough Sustainability Framework</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What contribution does this activity make to:</strong></td>
</tr>
<tr>
<td>1. Making our community prosper</td>
</tr>
<tr>
<td>1a Reducing levels of unemployment</td>
</tr>
<tr>
<td>1b Encouraging higher skilled and higher paid jobs for local people</td>
</tr>
<tr>
<td>1c Increasing the level of new business start-ups</td>
</tr>
<tr>
<td>1d Encouraging local investment to improve local infrastructure and amenities</td>
</tr>
<tr>
<td>1e Promoting more sustainable businesses</td>
</tr>
<tr>
<td>1f Developing local supply chains and the local skills base in partnership with business and education</td>
</tr>
<tr>
<td>1g Encouraging quality accessible childcare facilities and support services</td>
</tr>
<tr>
<td>1h Raising educational standards of young people</td>
</tr>
<tr>
<td>1i Raising educational standards of adults</td>
</tr>
<tr>
<td>1k Enhancing the vitality and viability of key urban and rural areas</td>
</tr>
<tr>
<td>2. Making our community a safer place in which to live and work</td>
</tr>
<tr>
<td>2a Reducing crime</td>
</tr>
<tr>
<td>2b Reducing the fear of crime</td>
</tr>
<tr>
<td>2c Decreasing the number of people misusing drugs, alcohol and other substances</td>
</tr>
<tr>
<td>2d Encouraging local vigilance by improving community facilities, access and self-sufficiency</td>
</tr>
<tr>
<td>2e Ensuring developments/regeneration activities include design features that minimise the likelihood of crime</td>
</tr>
<tr>
<td>2f Tackling anti-social behaviour</td>
</tr>
<tr>
<td>What contribution does this activity make to:</td>
</tr>
<tr>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>3. Make our community healthier</td>
</tr>
<tr>
<td>3a Increasing opportunities for physical activity</td>
</tr>
<tr>
<td>3b Encouraging a healthier and nutritious diet</td>
</tr>
<tr>
<td>3c Improving access to health services</td>
</tr>
<tr>
<td>3d Helping to meet Government National Health Framework targets (mental health, heart disease, diabetes, cancer and older persons care)</td>
</tr>
<tr>
<td>3e Reducing the number of teenage pregnancies</td>
</tr>
<tr>
<td>3f Reducing the number of unfit homes and dwellings</td>
</tr>
<tr>
<td>3g Improving the health of children</td>
</tr>
<tr>
<td>3h Reducing air pollution and improving local air quality</td>
</tr>
<tr>
<td>4. Making our community a better place to live</td>
</tr>
<tr>
<td>4a Encouraging the use of brownfield sites rather than greenfield sites</td>
</tr>
<tr>
<td>4b Minimising the use of natural resources (water, energy and materials)</td>
</tr>
<tr>
<td>4c Promoting the use of renewable sources of energy</td>
</tr>
<tr>
<td>4d Reducing greenhouse gas emissions</td>
</tr>
<tr>
<td>4e Reducing fly tipping and litter pollution to enhance the attractiveness of public areas</td>
</tr>
<tr>
<td>4f Encouraging waste minimisation and avoidance</td>
</tr>
<tr>
<td>4g Encouraging and enabling the re-use, recycling and composting of waste</td>
</tr>
<tr>
<td>4h Protecting biodiversity and natural and semi-natural habitats?</td>
</tr>
<tr>
<td>4i Improving access to public buildings and local facilities for the disabled</td>
</tr>
</tbody>
</table>
### Borough Council of Wellingborough Integration Tool

<table>
<thead>
<tr>
<th>What contribution does this activity make to:</th>
<th>Contribution</th>
<th>Justification for Score</th>
<th>Potential for Improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>4. Making our community a better place to live</td>
<td>-</td>
<td>-</td>
<td>N/A</td>
</tr>
<tr>
<td>4j Improving transport options for the disabled and people with mobility problems</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4k Improving public transport services</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4l Helping to reduce the need to travel and reliance on the car</td>
<td>X</td>
<td>Improved environment</td>
<td></td>
</tr>
<tr>
<td>4m Improving the quality and usage of parks, play areas, allotments and open spaces</td>
<td>X</td>
<td>Fundamental to the SPD</td>
<td></td>
</tr>
<tr>
<td>4n Increasing provision of, and access to sporting, leisure, cultural and heritage activities and facilities</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4o Providing affordable, safe and decent housing</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 5. Making it happen

<table>
<thead>
<tr>
<th></th>
<th>Contribution</th>
<th>Justification for Score</th>
<th>Potential for Improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>5a Developing open and responsive governance at all levels</td>
<td>X</td>
<td>Community involvement, consultation</td>
<td></td>
</tr>
<tr>
<td>5b Delivering plans and services in an integrated way</td>
<td>X</td>
<td>Partnership working</td>
<td></td>
</tr>
<tr>
<td>5c Delivering plans and services that achieve long term value for money society and the environment</td>
<td>X</td>
<td>Promoting best practice</td>
<td></td>
</tr>
<tr>
<td>5d Ensuring relevant stakeholders are involved in local decision making</td>
<td>X</td>
<td>Consultation process</td>
<td></td>
</tr>
<tr>
<td>5e Ensuring plans, developments and proposals are designed for the long term and contribute to social, economic and environmental well being</td>
<td>X</td>
<td>Promoting best practice</td>
<td></td>
</tr>
<tr>
<td>5f Strengthening the role of the voluntary and social enterprise sector</td>
<td>X</td>
<td>Promoting partnership working</td>
<td></td>
</tr>
<tr>
<td>5g Encouraging partnership working</td>
<td>X</td>
<td>Promoting partnership working</td>
<td></td>
</tr>
<tr>
<td>5h Addressing social exclusion</td>
<td>X</td>
<td>Promotes best practice</td>
<td></td>
</tr>
<tr>
<td>5i Promoting equality of opportunity in Wellingborough</td>
<td>X</td>
<td>Promotes best practice</td>
<td></td>
</tr>
</tbody>
</table>
### Summary of Appraisal: Key achievements and how the activity can be improved as a result of the appraisal

Definition of public art needs to make it clear to the developer that it refers to elements of added value not what they would normally complete. A point to be added with specific reference to encouraging good use of resources, considering use of recycled or renewable materials.
Appendix C

Public Art SPD

General Comments

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Summary</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>NCC</td>
<td>Concerns raised regarding the strategic fit of the document within the changing framework, LDD’s policies, and the North Northamptonshire Joint LDF. Stated a need for a cohesive approach and noted that other Council’s in North Northamptonshire did not intend to develop similar SPD’s.</td>
<td>“Report &amp; Guidance Notes: Commissioning Public Art” document is being produced by the Arts Strategy Manager at NCC providing a guide to be promoted to all Borough &amp; District Councils across the county. The guidance was developed with consideration to the SPD. If the joint core strategy or joint development control documents include a different approach to public art the SPD can be revised to take account of this at a later stage, or a joint SPD can be prepared. It is however considered helpful to produce this guidance now to deal with issues which may arise in advance of the adoption of the joint LDF.</td>
</tr>
<tr>
<td>NCC</td>
<td>Noted that the intention to prepare a SPD on Public Art is contained within the Local Development Scheme however “the land use planning content is also relatively thin, and when allied to the issue raised above, therefore poses the question of whether it should be a standalone SPD in the first place.”</td>
<td>The guidance is linked to a saved local plan policy</td>
</tr>
<tr>
<td>NCC</td>
<td>Concerns were also raised that the SPD links to local, time-limited Plans and strategies and suggest it should more effectively connect with national/sub-regional guidance instead.</td>
<td>Additions of national/regional context included.</td>
</tr>
<tr>
<td>CABE</td>
<td>No comment on the document however would welcome the opportunity to offer advice at the earliest possible stage on any major or strategic design proposals which arise in the area covered by the document.</td>
<td>Noted</td>
</tr>
<tr>
<td>Government Office for the East Midlands</td>
<td>As stated on p2 of your draft SPD, SPD is not subject to independent examination and does not form part of the statutory development plan. Overall your draft SPD complies with the guidance set out in PPS12, Creating LDFs and the Town and Country Planning (Local Development)(England) Regulations 2004. It is</td>
<td>Noted</td>
</tr>
</tbody>
</table>
clearly cross referenced with policy G16 in the local plan to which it supplements, the documents status and chain of conformity is clearly illustrated in figure 1.1 and community involvement is clearly explained.

<table>
<thead>
<tr>
<th>Government Office for the East Midlands</th>
<th>Notwithstanding the above you may wish to take the following comments into account:</th>
</tr>
</thead>
<tbody>
<tr>
<td>- As Wellingborough Borough Council have not yet adopted a Statement of Community Involvement, you must be satisfied that the consultation arrangements reflect the minimum requirements set out in Regulation 17 and 18 of Town and Country Planning (Local Development)(England) Regulations 2004.</td>
<td></td>
</tr>
<tr>
<td>- The SPD must be consistent with National Planning Policy and in general conformity with Regional Planning Policy. It should also be in accordance with the relevant Regional Spatial Strategy (RSS). RSS for the East Midlands and the Milton Keynes South Midlands sub Regional Strategy are due to by published in March 2005.</td>
<td></td>
</tr>
<tr>
<td>- The SPD must be ‘Fit for Purpose’ as SPDs can cover a diverse range of issues and be in different formats.</td>
<td></td>
</tr>
<tr>
<td>- SPD can only be used to expand policy or provide further detail to policies in development plan documents or saved policies.</td>
<td></td>
</tr>
<tr>
<td>- The SPD must be reviewed on a regular basis alongside reviews of the development plan document policies to which it relates.</td>
<td></td>
</tr>
<tr>
<td>- You should be satisfied that sufficient Sustainability Appraisal has taken place to appraise the social, environmental and economic effects of plan strategies and policies, from the outset of the plan preparation process, so that decisions can be made that accord with the objectives of sustainable development. Local Authorities must fulfil the minimum requirements of sustainability appraisal, the key considerations of which are set out in PPS12 p24.</td>
<td></td>
</tr>
<tr>
<td>- Following community consultation regarding the SPD</td>
<td></td>
</tr>
<tr>
<td>It is considered that all of these comments have been covered.</td>
<td></td>
</tr>
</tbody>
</table>

If the Council adopts the SPD, an adoption statement...
you must satisfy the requirements set out on p121 of ‘Creating LDFs’ and Regulations 18 and 19 before formally adopting the document.

together with this document and a copy of the SPD will be made available for inspection at the Council Offices and published on the Council’s website. They will also be forwarded to all those who made comments on the draft SPD.

Matthew Parry
Castlemore

The document reads very well, links well with policy and sets out the way in which it will link in with the new Planning Framework. I also think that developers will be helped by the document as not all of them understand the concept of public art or the way in which to go about commissioning it for example, so I think your guidelines should prove extremely useful. I cannot think of any particular area that you’ve missed or that requires clarification.

Noted

Judith Thompson, Chairman
Wellingborough Civic Society

Any artworks installed on the highway should not cause traffic hazards, especially vehicle drivers looking at them. All checks should be made with Highways Authority before commissioning. Local artists should be given priority. Schools and young people could be asked for help and views, its their future we’re planning. Included in the costs should be future budgets for the upkeep of the works. Nothing looks worse than tatty artwork.

Consideration of appropriate partners added to section 4.1

Addition in section 4.1 for special consideration to be given to local artists/crafts people
Section 4.9 encourages community involvement which includes young people.
Maintenance costs included in budget considerations listed in section 4.7. Further point added in section 4.14

AMENDMENTS

- Additions in section 2 of national & regional context statements
- Addition in 4.1 “What partners are needed to effectively deliver the project eg highways authority, schools, community groups, etc.”
- Addition 4.1 “Hiring only professional artists and/or crafts people (with special consideration to local artists/crafts people)”
- Addition 4.14 “Funding and responsibility for maintenance need to be considered and secured at the earliest possible stages of a project as part of the initial project plans. A maintenance plan can be submitted by the artist including likely costs.”
### SECTION 2. Anonymous Feedback – 4 responses completed on feedback forms

<table>
<thead>
<tr>
<th>Question</th>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you agree with the general principles of the SPD?</td>
<td>Yes</td>
<td>Noted</td>
</tr>
<tr>
<td>Do you find the SPD clear and easy to understand?</td>
<td>The main body is understandable but the first few pages and Appendix A were not – too much jargon &amp; anachronisms</td>
<td>Anachronisms and abbreviations are all written in full at least the first time they are used. First pages are necessarily complex to comply with planning requirements.</td>
</tr>
<tr>
<td></td>
<td>Reasonably</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Yes, once the first pages, with all the abbreviations eg LDD, DPD, are over. Several of the abbreviations do not appear to be explained in the text.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Do you agree the advice given is based on good/best practice?</td>
<td>Yes</td>
<td>Noted</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Agree that common perception of public art is limited to statues however the definition aims to dispel this by broadening the possibilities. The aim of the SPD is to encourage a wide view of the possibilities offered by public art and initiate thoughts/discussions. It is also noted that the document is aimed mainly at developers providing public art as part of a Section 106 agreement.</td>
<td></td>
</tr>
<tr>
<td>Any comments on the definition of Public Art.</td>
<td>Needs to be ‘think tanked’ a bit more as most people in the community will think that public art = statues even though these definitions refer to light/sound projection &amp; the use of art within ‘everyday’ objects ie benches, fences. If people ‘hit on’ the site specific aspect &amp; that part says something about heritage etc it will be accepted more. A public art trail following on from the art trail would be great.</td>
<td>A good explanation covering every aspect that we can think of.</td>
</tr>
<tr>
<td></td>
<td>I would sooner the definition be followed in brackets by (environmental art) or (townscape art) whichever is applicable, maybe (parkland art) etc.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>None</td>
<td>Noted</td>
</tr>
</tbody>
</table>
**Appendix C**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you feel all the major benefits have been included, have any been missed or do you feel some should be removed?</td>
<td>Making Wellingborough stand out &amp; putting it on the map could be added. 3.2.1 includes benefits “Environmental – regeneration, creation of a sense of place, identity”</td>
</tr>
<tr>
<td>Do you agree with the suggested stages and considerations for the process of commissioning Public Art?</td>
<td>Yes but need to realise that although an artist’s vision may be creative &amp; beautiful etc. it may not be practical maintenance issues if long term or considerate of health &amp; safety implications or vandalism issues. Would be useful for emerging artist to be pointed in direction of the actual possible ‘makers’ of their vision (if applicable) &amp; to be trained in order to address health &amp; safety issues, vandalism, maintenance, etc. Artists working within public art have a broad knowledge and understanding of the practical issues involved in their discipline. Artists also work closely with the development team to ensure these issues are dealt with and as such emerging artists are also supported by engineers, builders, architects, etc. Training is available nationally and can be accessed through the Arts Council. Only if its lottery funded or business and individuals are willing to finance the projects, obviously getting recognition for their outlay in business promotion, advertisement and their name made public, if they so desire. They could even submit some of their waste materials into the projects which cuts down on their waste disposal &amp; pollution. The materials have to pass a health &amp; safety test first. The majority of funding for public art is likely to be secured through section 106 agreements and lottery funding however the SPD demonstrates the innate value and benefits of investment in public art. Section 4.1 includes “Consider efficient use of resources and recycled and/or renewable materials”</td>
</tr>
<tr>
<td>Do you feel all relevant information is included?</td>
<td>Yes, but hope that the hiring of professional artists and/or crafts people [4,1] will not preclude eager amateurs from participating. Yes, should there be a clause asking for local artists (if available) to be considered first? Addition in section 4.1 for special consideration to be given to local artists/crafts people</td>
</tr>
</tbody>
</table>

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**Public Art: A guide to good practice SPD**

Consultation Feedback 23
### Does the SPD achieve its aim?

| Yes | Guidance is aimed at developers and local authority members and officers. |

### Any other comments.

| Need a much more basic introduction. It’s extremely difficult to force yourself beyond page 2. I believe public art to be of immense importance for all the reasons outlined & for tourism – getting a place known & bringing people into a town/village. 99% of modern development appears to be concerned with lack of uniqueness, packing as many people into a square mile as possible & actually cutting down social & health issues ie small gardens, noise pollution because of thin walls therefore friction within communities, lack of infrastructure in particular. Embracing public art would help bring back character into architecture & the environment. |
| Noted |

| On permanent works of art commemorative plaques etc could be fitted to commemorate historical artistic figures of the town or area ie John Askham (The Shoemaker Poet) Schools could be encouraged to visit the public art display/areas as part of their art lesson and they could be encouraged to help or participate in future projects or ongoing ones. |
| Suggested consideration of a plaque in section 4.1 |

| Will consideration and/or money be included for projects for maintenance purposes on art projects once installed? This could be ongoing and costly on some projects (fountains, carved trees, etc.) and must be carried out so as not to lose the initial impact of the scheme as the project ages. |
| Maintenance costs included in budget considerations listed in section 4.7. Further point added in section 4.14 |

### AMENDMENTS

- Abbreviations and anachronisms to be clearly defined at least the first time they are used
- Addition to 4.1 “How the project will be promoted after it has been completed eg. a plaque near a permanent piece of artwork, book published including images of a project, etc.”

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Public Art: A guide to good practice SPD

Consultation Feedback

24
Purpose of Report

1.1 To agree a response to consultation by the East Midlands Regional Assembly upon the Draft Project Plan and Statement of Public Participation for the Review of the Regional Spatial Strategy for the East Midlands.

1.2 The Council has previously agreed to delegate its response to this committee.

Background

2.1 The Regional Plan (technically the Regional Spatial Strategy, RSS) replaces the old Regional Planning Guidance (RPG). The Regional Plan is now a statutory document forming part of the development plan. Decisions on planning applications generally have to be taken in accordance with development plan policies. The role of the Regional Plan is to provide a long term development strategy for the East Midlands over the next 15-20 years and to include the overall scale and distribution of new housing, environmental priorities, transport, infrastructure, economic development, agriculture, minerals extraction and waste treatment disposal. It forms the context for the more detailed provisions provided for in our local development documents.

2.2 The former Regional Planning Guidance (to 2021) was last revised in March 2005 – this review included amongst other matters elements of the Milton Keynes and South Midlands sub regional study applicable to Northamptonshire. It was, however, only a partial review and although it technically forms the current RSS is not entirely compliant with the new legislation. Consequently this early review rolling the plan forward to 2026 has now been commenced.

2.3 The Regional Plan is prepared by the East Midlands Regional Assembly as the designated Regional Planning Body. Concurrently the Regional Assembly will be undertaking a review of the Regional Economic Strategy (RES). Clearly the two documents should be complementary and derived from a common information base. Both will form part of the Integrated Regional Strategy (IRS) the overarching framework for all East Midlands strategies.

Discussion

3.1 The review is initiated by the current paper which sets out a project plan for the production of the strategy and a statement of how the community will be involved. The paper outlines:
• the vision and objectives of the review
• key issues
• responsibilities for and timing of necessary work
• details of consultation

It poses a series of questions, answers to which are put forward in this committee report.

3.2 A second paper accompanies the ‘Proposals for Review’: the scoping study for the environment assessment. As with the new local development documents, regional plans must be subject to environmental assessment as an integrated process throughout the plan’s preparation. The first stage (akin to the pre application scoping stage of larger planning applications which must also be subject to environmental assessment) sets out the appropriate range of matters that will be considered throughout the process.

Vision and Objectives

Q1/Q2 Can either the Vision or Objectives be improved? If so, how?

3.3 The current vision and objectives of the RSS are set out in the appendix to this report. As these were only recently subjected to public scrutiny no changes are proposed. In view of recent public scrutiny and of the tight timetable sought to complete the review, pragmatically there is some merit in ‘no change’. However, with the possible exception of objective 7, there appears nothing in either the vision or objectives which can easily be identified as East Midlands specific and which could not equally be applied to the majority of regions in Western Europe. In view of the desire to engage more fully with the community in preparing the review, some recasting of the vision at least to give a flavour of the East Midlands would be helpful (even if it simply refers to a region struggling for an identity!).

Key Issues

Q3 Have the right issues been identified?

3.4 Key issue 1 – housing. The amount and broad location of housing; and the proportion that is affordable are identified as key issues. It should be noted that following from the MKSM sub regional strategy dwelling numbers by district have already been identified for Northamptonshire although the period 2021 – 26 remains to be considered. A further issue is how to make best use of the existing housing stock and all must be considered in the context of, for example, the need to protect the environment and reduce the rate and impact of climate change.
3.5 Key issue 2 – employment and economy. Key issues are the low wage/low skill economy; quality and location of employment is more of an issue than overall quantity; and there is no clear retail hierarchy but a number of centres are in need of public sector support to encourage private sector involvement.

3.6 Key issues 3 – transport. Measures need to be developed and transport investment prioritised to locate new development to bring about reductions in the need to travel and to shift travel away from the private car and road freight. The East Midlands has experienced the highest level of traffic growth in England over the last 10 years, north south routes are congested, east west routes are generally poor and there is very low commuting by rail (lack of local network).

3.7 Key issue 4 – environmental quality and protection. Biodiversity is well below the national average; flood risk and water management issues are especially important in the east of the region; despite the Peak District National Park and the Lincolnshire Wolds AONB, nationally designated landscapes are the lowest of all English regions; and the historic environment in the region is often undervalued in the face of growth pressures. The challenge for the Regional Plan is to promote measures to protect and to substantially enhance the quality of the environment (including that of the urban built environment) whilst also supporting the region’s social and economic needs.

3.8 Key issue 5 – waste. The Regional Waste Strategy aims to reduce the growth in waste but even if successful the reduction in landfill capacity means that the lack of other treatment facilities must be addressed.

3.9 Key issue 6 – energy. The Regional Plan will need to promote energy efficiency and a marked increase in renewable energy generation.

3.10 Key issue 7 – sub regional issues. Areas for additional sub regional work are considered to be: 3 cities sub area, northern sub area and Lincoln policy area. It is also stated that the development needs as part of the MKSM strategy for the period 2021 – 26 will need to be considered, so that all parts of the Regional Plan have a consistent end date.

3.11 Key issue 8 – cross border issues. Clearly the Regional Plan will need to be consistent with relevant policies in neighbouring regions. For North Northamptonshire the Milton Keynes South Midlands sub region is clearly most relevant.

3.12 In response to Q3, it is considered that although this is a comprehensive range of issues for the Regional Plan to address consideration should also be given to mineral extraction (sand and gravel and aggregates) particularly in the context of the growth area proposals in the Southern sub region and to agriculture in the light of continuing major change in this sector of the economy and its environmental consequences. There are also some supplementary comments to be made. The paper refers to a lack of a retail hierarchy but does not identify this as a specific challenge. In view of the recently published Planning Policy Guidance (PPS6) it is considered this should be addressed. With respect to transport greater
prominence should also be given to the need to address deficiencies that have already arisen as a result of past traffic growth and especially in the context of the enhanced growth now being proposed in Northamptonshire. Similarly how to develop local rail networks in the light of this a relevant issue. The relative deprivation of the East Midlands in biodiversity and protected landscape on a national scale should afford environmental issues some priority. Finally – possibly in terms merely of phraseology – the issue of post 2021 MKSM growth must not be downplayed.

Work Programme

Q4 Is the work programme realistic in the time available?

A work programme covering the development of policies and options between Sept. 2005 and Sept. 2006 is set out. It is related to the key issues described above. Thus main work areas are as follows.

Housing – developing figures for individual districts (for Northants only 2021-26) looking in particular at urban capacity, affordability and density.

Employment/Economy – employment land provision for each district; refine town centre and retail guidance on basis of more up to date information; and look at need for regional scale casino (s).

Transport – develop a list of infrastructure priorities based upon a consistent methodology across the region; examine behavioural change; consider development at East Midlands airport; and consider revised car parking standards.

Environment – focus on green infrastructure (additional to work already commenced in Northants); develop regional flood risk and water management assessment.

Waste – develop figures for the scale and type of new facilities.

Energy – develop new targets for renewable energy production.

Sub Regional – the three specified sub areas plus MKSM.

3.14 This is considered to be a challenging work programme but one which must be pursued if the RSS is to play its proper role in the context of concurrently emerging local development documents.

Statement of Public Participation

Q5 Is this the right approach to secure community involvement?

3.15 There is a need to respond to the Government’s desire for greater community involvement – this will be especially challenging at the regional level. Three separate areas of work are proposed:

i) awareness raising including a media campaign and publishing results of an initial MORI Survey across the region into public attitudes to housing, jobs, transport and the environment;

ii) consultation upon this draft project plan and sustainability appraisal scoping report by, for example, making the documents widely available, holding consultation events around the region and continuing the media campaign;
iii) consultation upon the developing policies and options stage, utilising existing citizens panels and developing new arrangements for hard to reach groups, holding consultation events, making use of existing networks such as LSPs and identifying sub regional champions.

3.16 A key aspect of developing community involvement will be the development of a public participation support service with East Midlands Planning Aid (EMPAS) to assist with hard to reach groups and focussing initially on the 3 cities, the former coalfields and north Northamptonshire especially Corby, Kettering and Wellingborough.

3.17 Clearly the Council will wish to welcome the EMPAS focus on North Northamptonshire and the efforts to engage with hard to reach groups. Realistically, something as apparently remote from people’s everyday lives is unlikely to stimulate considerable public enthusiasm especially at the current project plan and scoping stages. It is therefore considered advisable that the regional body concentrates upon engaging with representative groups rather than the public at large. In terms of limited resources it is considered that a focus upon renewed awareness raising and upon developing options will be the most productive approach. It has already been noted that the vision is somewhat bland: making it more East Midlands specific may assist in engagement with the community.

Sustainability Scoping Report and Other Matters (Q6/Q7)

3.18 Finally questions are posed as to the adequacy of the Sustainability Scoping Report and whether there are other matters that respondents wish to raise. The list of regional topics in the scoping report is wide – refer to the second appendix to this committee report. It is considered that the scoping report correctly identifies the key issues that must be addressed and appropriate methodology for the sustainability appraisal. No further matters have been identified to raise in response to the project plan.

4 Legal Powers

4.1 The Regional Plan is prepared under the Planning and Compulsory Purchase Act 2004.

5 Financial Implications

5.1 None arising from this report.

6 Risk Analysis

Failure to engage in the regional planning process could disadvantage the Borough by the provisions of the Regional Plan not having been formulated with knowledge of the Borough Council’s views.
6.1 Implications for Staffing
None arising from this report.

6.2 Implications for Sustainable Development
The achievement of sustainable development is a central purpose of the planning system.

6.3 Implications for Equal Opportunities
none arising from this report.

6.4 Implications for Community Safety
none arising from this report.

6.5 Implications for Health Improvement
none arising from this report.

6.6 Implications for Property
none arising from this report.

7 Recommendation

7.1 That the response to the questions put in the consultation upon the Proposals for Review of the East Midlands Spatial Strategy are agreed to be as set out in paragraphs 3.3, 3.12, 3.14, 3.17 and 3.18 of this committee report.

8 Author and Contact Officer
8.1 Roy Pulling, Head of Spatial Planning

9 Consultees

10 Background Papers
None unpublished.
REPORT OF HEAD OF SPATIAL PLANNING

OPTIONS FOR NORTH NORTHAMPTONSHIRE – CONSULTATION

1 Purpose of Report

1.1 To agree the Council’s response to the issues and options paper from the North Northamptonshire joint planning committee/unit and prepared as a precursor to the joint spatial strategy for North Northamptonshire.

1.2 The Council has previously agreed to delegate its response to this committee.

2 Background

2.1 Corby, East Northamptonshire, Kettering and Wellingborough Councils together with the County Council are jointly preparing an overall spatial planning strategy for North Northamptonshire. This will form the framework for more detailed plans to be prepared by individual districts (such as in our own case a site specific plan for the Borough and a town centre plan). The issues and options paper is the first stage in the preparation of this overall framework.

2.2 The context for the ‘North Northamptonshire Plan’ is set by national planning policy and by the Regional Spatial Strategy (RSS8). The latter incorporates those parts of the final version of the Milton Keynes and South Midlands Sub Regional Study applicable to Northamptonshire which set out the Government’s proposals for enhanced growth in the area.

2.3 As a result of the national and regional policy a number of matters are already decided. These include: major growth at the three main towns of Corby, Kettering and Wellingborough, smaller scale expansion of other towns and very limited development in the villages; priority to brownfield sites (although it is recognised that to accommodate the scale of development proposed will require significant greenfield sites on the edge of towns); the scale of development between 2001 – 21 (52,000 dwellings in North Northamptonshire of which 12,800 should be within this Borough); and the longer term perspective of the sub regional study to accommodate a further 28,000 dwellings in North Northamptonshire between 2021 and 2031 (albeit as an “uncommitted planning assumption subject to later review”).

3 Discussion

3.1 The paper was sent earlier to all Members. Within it are posed a series of questions to focus responses. Each is discussed in turn below, with the page reference from the paper included for ease of reference.
Vision and Objectives

Q1 (adequacy of draft vision and objectives) page 9.

3.2 It is considered that the vision and objectives are sufficiently comprehensive, balanced and North Northamptonshire – specific. The Local Strategic Partnership is at present developing a vision for the new Community Plan. Work to date suggests that this vision and that of the spatial strategy will be complementary.

Settlement Roles

Q2 (relationships between settlements) page 10

3.3 In terms of local relationships it is agreed that the groupings postulated do have validity although it is likely that the rural north looks principally to Peterborough. It is considered that improved transport links (partly consequent upon WEAST) together with greater co-ordination between this Council and East Northamptonshire could further strengthen the Wellingborough/Rushden/Higham Ferrers/Irthlingborough grouping to mutual benefit.

Q3 (Corby, Kettering, Wellingborough) page 12

3.4 Faced with the draws of towns such as Leicester, Milton Keynes, Northampton and Peterborough, there will be limits to the degree to which North Northamptonshire can ‘pull back’ services and jobs. Nevertheless, it is not unreasonable to aspire to a greater role for the three growth towns in terms of performing an improved role within their local catchment. The option (B) of focussing on one town is therefore unhelpful – the result would be one town that would still be unable to compete on equal terms with the larger rivals referred to earlier whilst the other two towns would become less able to perform their local functions adequately.

3.5 Option C (specialisation) is superficially attractive but taken too far would produce unbalanced (and unviable) town centres, again unable to compete with larger rivals but less well able to perform a local multi functional role; it is unrealistic to assume that improvements in transport infrastructure between the three towns (although desirable) would preclude further leakage to other centres.

3.6 A preferred option would be to allow for a limited amount of specialisation for higher order functions (eg for the Castle to be the principle theatre, Kettering to be the principal cinema venue etc.) without losing the capacity of each of the three towns to retain a range of viable functions – albeit not to the extent of increased self containment/non co-operation as implied by Option A. Setting the option of limited specialisation in terms of the Corby/Kettering and Wellingborough/Rushden/Higham Ferrers/Irthlingborough groupings may also be advantageous.

Q4 (the smaller towns) page 13

3.7 The proximity of individual smaller towns to either Corby, Kettering or Wellingborough suggests that both improved linkages (option B) and some specialisms for smaller towns (option C) is a more realistic workable scenario in this instance. It should be noted, however, that greater functional links between Wellingborough, Rushden, Higham Ferrers and Irthlingborough stimulated by the WEAST development must not lead to physical coalescence.
3.8 The relative compactness of this Borough compared to districts such as East Northants does not lend itself readily to a workable local service centre approach. The larger villages Irchester, Earls Barton, Finedon have traditionally taken a proportionately larger share of rural growth on the basis of their greater provision of services. This, however, could be a too simplistic approach and takes no account of factors such as school capacity or environmental constraints. Therefore an option based more upon ‘local needs’ (option B) would be preferable.

3.9 Clearly in terms of the North Northamptonshire scale considerable investment will be needed in bus services to effect modal shift for personal transport. A key must be not merely to enhance services between the three main towns but to develop effective networks within the catchments of individual towns. Thus the development of a multi modal interchange at Wellingborough station, better rural connections and links between Wellingborough and the nearby towns of East Northants will be a priority. For freight transport greater use of rail transport would be facilitated by support for rail – related development at Neilson’s Sidings as presently provided for in the Local Plan.

3.10 Notwithstanding the above it is vital that road improvements keep pace with changing traffic needs and that the programmes of the County Council and the Highways Agency are adjusted to tie in closely with the growth area. Thus the A509 linkage between the A45 and the A14 should be a local priority, improvements to the trunk roads such as junction improvements on the A45 and the improvement of the A14 around Kettering should be brought forward ahead of further growth and central Government funding for schemes such as the Midland Road bridge should be assured.

3.11 Improvements in health provision and in local further education will be key major facilities to be enhanced. It is considered that insufficient attention has been given to health objectives. Reference should be made to the ongoing work of the MKSM Health and Social care Group. For education in order to develop skills appropriate to higher value employment the development of university education locally must be a priority; if this is to be based upon University College, Northampton, satellite centre(s) may have to be considered for North Northamptonshire. Although clearly priorities will need to be established, the phaseology of question 8 gives some cause for concern. The stance of this Council (and others of North Northamptonshire) would be that if funding is to be ‘limited’ rather than relating to growth needs, then the scale of growth as presently required should not be sought. Whilst the pilot scheme of using planning obligations more widely may ensure better focus, it is unlikely that developer contributions alone will provide sufficient funding.

3.12 As part of its response to the sub regional plan this Council sought to include some form of mechanism to limit housing growth if this outpaced the growth in
employment. Although the sub regional plan was modified to include an indicative employment figure, the links between housing, employment and infrastructure need greater certainty within the spatial strategy. Additionally in view of the desire to attract higher value employment it is assumed that working age families and younger people will be the focus for much of the growth; in this regard it is questioned whether the indicative employment figure is sufficient and therefore this is an issue which should be addressed further.

Q10/Q11 (options for future jobs) page 18

3.13 Clearly a mixed economy will serve the local community well. Thus some combination of options A & B is preferred. The WEAST development is planned to achieve range of employment opportunities within a sustainable urban extension. In addition the Council will look to enhance opportunities for office employment also within the town centre.

Location of Housing

3.14 Q12 / villages, rural areas smaller towns) page 20
It follows from the response to Q5 that the rate of development in the villages will be dependent upon local needs and thus at this stage it is not possible to assess if this will be the same or less than past development. This is likely to vary between villages. As regards the smaller towns of Kettering Borough it is considered that a greater role for Burton Latimer is undesirable as to all intents and purposes this would merely be an extension of Kettering south of the A14 and, as a general principle, could lead to unacceptable urbanisation of the country side between Kettering and Wellingborough. In view of the potential of the southern group of towns of North Northamptonshire (Wellingborough, Rushden, Higham Ferrers and Irthlingborough) to jointly create a counter balance to Corby-Kettering (Q2/3) there is some merit in focussing some of the development for East Northants upon Rushden, Higham Ferrers and Irthlingborough. This must be carefully planned, however, to again avoid physical coalescence with Wellingborough itself.

Q13/Q14/Q15 (Corby, Kettering, Wellingborough) pages 22 and 24.

3.15 In view of the incompleteness of background studies, there is a case at this stage to reproduce the directions of growth from the Growth Area Assessments. At the examination of the sub regional study, however, this Council argued that west of Wellingborough should be treated as a special strategic case. This was based on the need to maintain separation between the North Northants growth and that of West Northamptonshire (Northampton). Whilst the sub regional study did exclude (at least for the period to 2021) this Borough from the Northampton Implementation Area, it is considered that greater weight would be afforded to the principle of separation over the longer term if a specific policy severely limiting growth in the A45/A4500 corridor between Wellingborough and Northampton was introduced. On this basis, the west of Wellingborough should be excluded from the growth direction options irrespective of further background studies. It follows (Q15) that, for Wellingborough, development should be concentrated in larger urban extensions. This could of course place some limit on the scale of development that might be entertained post 2021. This is discussed below.

Q16/Q17 (post 2021 growth) pages 24 & 25
3.16 Although post 2021 growth distribution is a matter for future testing (initially in the review of RSS8) simply ignoring the possibility of further growth is not an option: regional guidance requires that regard be had to growth of (tentatively) 28,000 dwellings in North Northamptonshire between 2021 and 2031. Unless proper regard is taken the plan is likely to fail the test of soundness which all local development documents must meet.

3.17 From the discussion in para 3.15 above, the east and north must remain the preferred directions of growth for Wellingborough. In its previous deliberations upon capacity for growth the Council has concluded that development east of WEAST should be limited by the need to maintain separation from Finedon, Irchester, Rushden and Irthlingborough. The inspector who conducted the inquiry into the 1999 Local Plan concluded that north of Wellingborough was a less sustainable location than the east. Taking this into account together with the need to avoid coalescence with Great Harrowden and creeping urbanisation along the A509 north corridor will also place limits upon development to the north. Nevertheless, it is likely that some intensification of development over and above the 6400 dwellings to the east and 2200 dwellings to the north (as required along with development in the existing urban area to meet the target for housing to 2021) as postulated in earlier discussions upon the growth proposals may be possible.

3.18 It is, however, not possible in advance of further studies to fully assess the constraints to further capacity. Once these are available a master planning approach could be adopted to ensure that any reasonable post 2021 growth would not be prejudiced (option A). What must, however, be made clear is that, until such time as the issue of post 2021 growth is resolved, planning applications that seek to encompass post 2021 extended urban extensions with consented dwelling numbers (however conditioned) should be refused on the grounds of prematurity. No commitment to what proportion of the 28,000 dwellings should be accommodated should be given.

Q18 (Smaller towns and rural service centres) page 25

In general, directions of growth for the smaller settlements should be a matter for individual local authorities within their site specific local development documents. The exception should be where cross border issues arise which is the particular remit of the joint spatial strategy. From this authority’s point of view this will apply to Burton Latimer, Rushden and Irthlingborough.

Q19 (phasing) page 26

WEAST as allocated in the Local Plan is subject to current planning applications and the business park to the south is under construction. The 1999 Local Plan inspector concluded the east to be sustainably preferable to the north. Consequently it is considered that the east could be prioritised. Nevertheless owing to the need to bring forward development at higher rates than has been achieved in the past, some choice of location could be advantageous. It is suggested therefore that development of the northern urban extension (which was assessed in the Council's earlier deliberations upon the sub regional study to be required to accommodate approximately 2000 dwellings) should be phased to follow the development of the presently allocated area of WEAST (i.e. before
or concurrently with development east of WEAST).

Environment and Green Spaces

Q20/Q21 (green infrastructure) page 26
3.21 The paper notes that protection of the environment is a ‘given’. It is considered that whilst this may be true consideration of environmental matters should be given more explicit consideration and afforded a clearer degree of priority. Environment needs to be considered in its wider sense and further reference is made to this point in paragraph 3.23 below. For Q20/Q21 the paper is concerned with the planning of green infrastructure – essentially multi functional networks of green space managed to conserve the environment. This is contrasted with more traditional approaches of unconnected pockets of open space in individual housing estates.

3.22 As part of its open space provision Wellingborough has long developed its linear open space system based on the river/stream valleys and ridgelines of which it can be justifiably proud. The system will be extended by the town park (Ise Valley) as part of the WEAST development. The Council’s open space and nature conservation strategies are designed to address the issue of multi use and environmental conservation. Thus this Council would commend such an approach in relation to the area as a whole.

Making Development a Success

Q22 (guidelines for new development) page 26
3.23 In conclusion the paper sets out a series of 12 broad guidelines to underpin policies in the plan. Views are sought as to whether these are sufficiently comprehensive. In the broadest sense these are comprehensive. It is, however, considered that guideline 5 (sustainable design) should be more explicit /subdivided to encompass environmental issues in their fullest sense (as discussed in para. 3.21 above). Thus for example matters such as energy conservation should be drawn out.

3.24 Finally it is considered that the paper addresses the majority of issues which are most pertinent to the plan. It should, however, be questioned whether the need to address the continued separation of the growth towns and the prevention of coalescence with smaller towns and settlements has been sufficiently addressed. This is mentioned specifically in the Milton Keynes and South Midlands Northamptonshire Policy 4 of RSS8. The issue of coalescence is also pertinent to the future growth of the West Northamptonshire growth area as referred to in para 3.15 above. Consequently it is recommended that this issue should be specifically addressed at the strategic level of the spatial strategy and assessments made of the most appropriate option (for example defined Areas of Restraint/Green Wedges) to reflect the sub regional policy.

4 Legal Powers

5 **Financial Implications**

5.1 There are none arising directly from this report. The work of the JPU is supported equally by the four Borough/District Councils and the County Council partly by seconding officers and partly by financial contribution as provided for in budgets (planning delivery grant).

6 **Risk analysis and Implications**

Although the joint spatial strategy is to be jointly prepared by the North Northamptonshire authorities failure to respond also from a solely Wellingborough perspective could result in the specific interests of the Borough not being afforded sufficient weight.

6.1 **Staffing**

None arising directly from this report.

6.2 **Implications for Sustainable Development**

The fundamental rationale behind the joint spatial strategy will be about creating sustainable communities across North Northamptonshire.

6.3 **Implications for Equal Opportunities**

None arising directly from this report.

6.4 **Implications for Community Safety**

None arising directly from this report.

6.5 **Implications for Health Improvement**

None arising directly from this report.

6.6 **Implications for Property**

None arising directly from this report.

7 **Recommendation**

7.1.1 That paragraphs 3.2 - 3.24 of this report are approved as the Borough Council’s response to the questions put in the paper ‘Options for North Northamptonshire’, June 2005.

8 **Author and Contact Officer**

8.1 Roy Pulling, Head of Spatial Planning
9 Consultees

10 Background Papers
None unpublished.
1 Purpose of Report
1.1 To approve the proposed amendments to the draft East of Eastfield Road Development Brief and further work needed on the document. To delegate the powers for adopting the Development Brief as a Supplementary Planning Document to the Director of Environment and Economy in liaison with the Chair and Vice Chair of Economic & Environment Committee.

2 Background
2.1 Under provisions in the Planning and Compulsory Purchase Act 2004 a Local Development Framework (LDF) is being prepared. This comprises Development Plan Documents (DPDs) that are part of the Statutory Development Plan and Supplementary Planning Documents (SPDs) which expand policies set out in a DPD or provide additional detail. The LDF also includes the Local Development Scheme (LDS) which is the public statement of the local planning authority’s programme for the production of local development documents. The LDS submitted to the Secretary of State includes this East of Eastfield Road Development Brief as an SPD with adoption anticipated for July 2005.

2.2 Work began on this document in June 2003 under the old planning system with a view to it being adopted as Supplementary Planning Guidance (SPG). This Committee on 12th November 2003 agreed to circulate the draft East of Eastfield Road Development Brief for consultation. Consultation with various stakeholders took place from 8th December 2003 until 20th February 2004. Further discussions as a result of comments received during that period have continued with various stakeholders. The briefs were available in paper form and on CD. A Community Consultation Event took place on 23rd January, and there were advertisements in the press alerting people to the consultation. Copies of the documents were placed in all the libraries in the borough and display material has been on view in the Swansgate Centre.

2.3 Further consultants studies on contamination, archaeology, topographical survey, flooding and allotment ownership funded by the ODPM £600,000 grant have been undertaken to feed into the East of Eastfield Road Development Brief.

3 Discussion
3.1 The consultation process has produced some helpful and constructive comments. A total of 19 bodies and individuals responded, many in detail. The comments have been summarised in the tables included as Appendix I. They are broadly arranged under the sections contained in the Consultation Draft of the
documents. The officers’ response to each of the comments is included in the same table together with a list of the proposed amendments. Amendments are at the end of each section in a grey box.

3.2 These proposed amendments in Appendix 1 will be made to the Development Briefs, as will the amendments which are required as a result of the technical reports done on East of Eastfield Road, which are identified in Appendix 2.

3.3 Further work is needed to undertake a sustainability appraisal and a statement of community involvement to include in the East of Eastfield Road Development Brief. This is due to the changes in Planning Policy Statements (PPS) which set out the Government’s national policies on different aspects of planning, supplementary planning guidance (SPG) have now been replaced with supplementary planning documents (SPD’s). Once these elements are complete all of the organisations and individuals who were consulted on the Development Brief, together with the statutory consultees, will be re-consulted for a period of 4 weeks. The draft SPD, Sustainability Appraisal and Consultation Statement will also be made available for inspection at the Council Offices, the Library and be published on the Council’s website. A notice by local advertisement will also be made in accordance with the Regulations

3.4 Any further comments on the East of Eastfield Road Development Brief will then be considered by Officers and presented to the Director or Environment and Economy in liaison with the Chair and Vice Chair of Economic and Environment Committee to approve and adopt as a Supplementary Planning Document (SPD). Following adoption the SPD, statement of the representations and the adoption statement will be made available as required by the Regulations

4 Legal Powers

4.1 The Town and Country Planning Acts.

5 Financial Implications

5.1 None

6 Risk analysis and Implications

6.1 Implications for Staffing

None arising directly from this report

6.2 Implications for Sustainable Development

The East of Eastfield Road Development Brief SPD has specific sections and advice which directly assist in providing for more sustainable development within the WEAST development area.

6.3 Implications for Equal Opportunities

The East of Eastfield Road Development Brief SPD has elements which require consideration of housing issues in relation to disability.

6.4 Implications for Community Safety

The East of Eastfield Road Development Brief SPD aims to improve community safety through better urban design.

6.5 Implications for Health Improvement
The East of Eastfield Road Development Brief SPD seek to ensure that the development is designed to ensure that ease of movement for pedestrians and cyclists is provided as a priority. This will bring health benefits associated with increased personal fitness and reduction of illnesses associated with poor air quality. The Neighbourhood Centre Brief makes provision for new Health Care Facilities.

6.6 Implications for Property
None

7 Recommendations

7.1 That the proposed changes are made to the East of Eastfield Road Development Brief and further work and consultation is carried out.

7.2 That the power to adopt the East of Eastfield Road Development Brief as a Supplementary Planning Document be delegated to the Director or Environment and Economy in liaison with the Chair and Vice Chair of E & E Committee.

7.3 That once adopted the East of Eastfield Road Development Brief is available in paper form for £10 and on a CD with the WEAST Development Framework and Development Briefs for £5 for members of the public.

8 Author and Contact Office
8.1 Roy Pulling, Head of Spatial Planning

9 Consultees
WEAST Project Team
Spatial Planning Team

10 Background Papers
None
EASTFIELD ROAD SITE BOUNDARY AND EXISTING USES

Figure 1.1 - Site plan

KEY
- Site boundary
- Contours
<table>
<thead>
<tr>
<th>Respondent</th>
<th>Summary</th>
<th>Response</th>
</tr>
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<tbody>
<tr>
<td>NCC</td>
<td>Overall, the County Council welcomes the publication of these three Draft Development Briefs and is strongly supportive of both their contents and the process followed to produce them.</td>
<td>Noted</td>
</tr>
<tr>
<td>H.V Moreton Allotment owner</td>
<td>Being part owner of an allotment which backs onto Eastfield Road, and therefore is planned to be retained as an allotment, will the value of it be restricted in the future as agricultural when the owners of allotments which are planned to become housing will reap a higher financial income. Should they be forced to sell?</td>
<td>The value of the land is not something which can be addressed in the SPG, this only deals with planning issues.</td>
</tr>
<tr>
<td>English Heritage</td>
<td>In general terms, we welcome the fact that the historical context of the sites has been looked at in each of the briefs. However, we are disappointed that the key principles of the WEAST SPG, referred to in paragraph 2.2.2 of the briefs, does not include any reference to protecting historic assets or for new development to being informed by the historic character of the existing built-up area, in order to achieve locally distinctive development with a ‘sense of place’. We note that the draft Milton Keynes and South Midlands Sub-Regional Strategy lists “a ‘sense of place’ “as a key requirement of sustainable communities in the sub-region.</td>
<td>A key principle of the brief is “a strong sense of local identity based on distinctive design” (4.6). This is amplified in para. 4.6.2, to take “cues from the best of Wellingborough’s local vernacular and building traditions and applying these in a contemporary way.”</td>
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<tr>
<td>English Heritage</td>
<td>The briefs provide some useful statements that do in fact acknowledge the need to create “a strong sense of local identity based on local design” (p. 44 of the Wellingborough East Brief). Also, para. 4.7.2. P. 56 of the Station Island Brief urges developers to take “cues from the best of Wellingborough’s local vernacular and building traditions and applying these in a</td>
<td>The brief establishes key principles, includes best practice photographic references and masterplanning illustrations of how these principles can be applied in practice. Developing further detailed guidance through the use of design codes is a good idea, and this suggestion is welcomed. This is something the Council will give greater consideration to as the process moves forward. Developers are also required to</td>
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</table>
English Heritage supports this approach to local distinctiveness, although it notes that the illustrations shown in the briefs make no attempt to reflect this. It may be that the use of ‘design codes’, as being utilised at Upton, Northampton and now advocated by CABE (The use of Urban Design Codes, 2004) and the ODPM, in its Winter 2003 Delivering Sustainable Communities magazine, should be considered as a way of encouraging this design approach.

### Mark Sanders
**Local Resident**

Concern that development is taking place before traffic relief routes are in place resulting in:
- Additional construction traffic
- Additional business traffic
- Additional commercial traffic
- Additional residential traffic

All current business, commercial & residential traffic

The planning strategy is to introduce the Eastern Relief Road and Midland Road Crossing as early as practicably possible. Potential problems of construction traffic and access for the initial development have been recognised and detailed measures for alleviating these are currently being progressed.

A full transport assessment will be submitted with the planning application for the area covered by Policy U17, which will be subject to public consultation.

Additional wording is proposed for paragraph 4.1.4.

### Mr & Mrs Douglas
**Castle Residents Committee**

Strongly oppose granting outline planning permission for all 3 schemes unless the proposed Eastern Relief Road can be completed well before 2010/2011. The removal of heavy goods vehicles from Eastfield/Senwick/Midland Road and access to the Eastern Relief Road for new traffic using the extended station is pre-requisite for the safe planning for these new schemes.

Concern is also raised in connection with the amount of heavy goods vehicles that use the Senwick/Eastfield road through route, and the area surrounding Saxby factory.

Concern is raised regarding the management of increased traffic and the problems that could be caused if the Eastern Relief Road is delayed.

The need to manage traffic along the Senwick Rd, Elsden Rd and Eastfield Rd corridor is accepted and is being explored.

It is anticipated that the Eastern Relief Road will result in a decrease in the HGV traffic on Senwick and Eastfield Roads. This is a major engineering project and the Council is working with the proposed developer to bring the forward its construction as soon as practicably possible.
| Mark Sanders  
Local Resident | Concern that any reduction in traffic on Eastfield Road would simply be replaced by new traffic accessing the area via Ambron House entrance on Eastfield Road. | Traffic generation will be fully considered in the Traffic Impact Assessment required. HGV traffic will be reduced on Eastfield Road. There will be traffic generated by the new residential area, but multiple access point will ensure dispersal onto the highway network. Traffic calming and streetscape improvements to Eastfield Road will enhance pedestrian crossing conditions. |
| --- | --- | --- |
| Mark Sanders  
Local Resident | Applications for TPO’s have been made on the following:  
  i. 1 deciduous tree to the left side and 2 to the right of the main Eastfield Road entrance to the site;  
  ii. deciduous trees, 1 to the rear each of property numbers 63, 65 and 67;  
  iii. conifers, one to the rear each of property numbers 71, 73, 75, 79/81 | A TPO will be made. This will be referred to in section 3.2 and the location of the trees shown on Figure 3.3. The housing layout in the area is likely to need amending to accommodate these trees. |
| Lovejoys | The objective of mixed use is understood and supported. The indicative layout does not, however, reflect that aim in that much of the existing employment land is redeveloped for housing and substantial areas of existing employment use (or potential use) lost without explanation. To achieve proper mixed use, a greater element of either retained, or redeveloped employment land would be appropriate. In any event, the major area of employment use proposed on the sidings area is uncertain due to its railway designation and this uncertainty could further erode the mixed use element proposed in the brief.  
  The draft SPG now indicates a potential capacity of 322 dwellings. It is still the developer’s and landowner’s view that only 200 dwellings can be delivered in the local plan period to 2016 given the landownership, environmental and technical constraints that apply to the site. | The Local Plan Inspector considered that if future changes of use are sought for the employment uses, residential conversions or redevelopment should be preferred. He recommended that the site be allocated based “primarily on housing and retained employment uses “. Reallocating certain industrial uses will have the added benefit of reducing HGV traffic on Eastfield Road and Mill Road  
  The total amount of dwellings is felt to be realistic given the location and potential to raise densities. All technical, environmental and landownership constraints can be overcome during the plan period especially with the provision of government funding to help remediate the site. |
| **Lovejoys** | We would welcome further clarification in respect of indemnity issues relating to drawings and information within the SPG which have been provided by Bovis and their consultant team. The Council should appropriately acknowledge that input where appropriate but should state explicitly that the contents of the SPG are the responsibility of the Council. Figure 3.6 will be caveated, as in the other WEAST Development Briefs. The reference to MLM/Bovis will be deleted and replaced with “This information is based on a desktop review using information supplied by other parties. It provides a strategic overview and should not be relied upon for decision making purposes. Applicants are strongly advised to undertake their own geotechnical / utility search investigations as part of the detailed planning process. |
| **Shoosmiths on behalf of Bruce Hilton** | In vehicular/pedestrian/cycleway the site is well permeated by existing access point without the necessity for a new access onto Finedon Road to the east of my clients existing land and vehicular access. There is a principle vehicular access to the site along my clients private accommodation road onto Finedon Road. The need for this access needs to considered in relation to location and the ability to provide access at a later stage of the phased development site. The access from Finedon Rd will be amended to ensure that there is no through route to the residential area, but still retains access to the proposed employment area to the west of the existing properties. The lower photo on page 23 shows that there is a considerable difference in levels between my clients properties fronting Finedon Road and the railway land. It is understood that no detailed investigation has taken place at the ability of any future development to provide access between the Eastfield Road sire and Finedon Road in the position shown on your illustrative masterplan at page 44 of your document. The advice to my client by Weston Allison Wright Chartered Surveyors and Building Consultants is that it would be firstly extremely difficult and secondly extremely expensive to construct such a road which would link back to my clients private accommodation road and thence in a westerly direction through proposed live work units to join up with the residential development to the south of the allotment gardens. It is not necessary to link such an access road to the Refer to Appendix 2 which considers changes arising from Technical Reports |
remainder of the development site to serve proposed employment uses alongside the railway on Railtrack land. It would also be extremely difficult to locate employment uses fronting Finedon Road and also accessing off this link due to the typography of the site. Furthermore the proposal to erect small employment uses on my clients land to the south of Units 1, 2 & 3 is impracticable as that is the service yard to units 1, 2 and 3 and in regular use.

It is unnecessary, impractical and unduly expensive to link my clients private accommodation by way of a further major vehicular access to Finedon Road. The need to connect to Finedon Road by vehicular access is not proven and the cost and ability to achieve this are not fully or adequately considered in relation to the plan.

Concern that there is too much weigh given to the requirement to link Eastfield Road to Finedon Road in the long term which will prejudice the proper development of my client land both in the short and long term and could in future years lead to significant highway concerns revolving around the proposed mix of business and residential traffic around my clients properties.

| Wellingborough Partnership | In land to the east of Eastfield Road, there seems to be no mention of local amenities, access to schools, etc. As this is a remote part of WEAST development, are there sufficient existing local amenities and schools to meet the needs of this development? | This issue is referred to in para. 3.7.3. Contributions to off site provision are likely to be required via a S106 agreement. Future residents of this site are likely to use both existing facilities within the town, and new facilities within the remainder of WEAST. Accessibility and integration with both is therefore important. It may therefore be helpful to clarify this in para 3.7.3 |
| Wellingborough Partnership | In particular for the land east of Eastfield Road and the Higgins Yard development of Station Island, thought | The impact on existing dwellings will be carefully addressed at the detailed application stage. |
### Wellingborough Partnership

- **Wildlife, habitat & hedgerows.** We are concerned that these have not been fully surveyed before these Development Briefs were prepared and ask that this be done even though we are not aware of any particular protective measures necessary. The maintenance and enhancement of wildlife, habitat and hedgerows should be included in the Development Briefs and not left until the planning application is made. In the land to the east of Eastfield Road, special mention is made of allotments, some of which appear to be used for housing, the derelict land brought back into use.

It is normal practice for detailed surveys to be undertaken and financed by the applicants. The Borough Council will require sufficient information to be submitted with the application to enable a proper decision to be made. Notwithstanding this, it is considered that an appropriate level of detail has been included to enable the development principles to be established.

Provision for wildlife is covered in section 4.3 Green spaces for people and wildlife. The management requirements are covered in section 5.5.

### Anglian Water

- **Any development must tie up with the previously agreed drainage strategy for Wellingborough East.**
  - All sewers must be kept in Public Highway (Public Open Space) or will need to be diverted to keep accessible.
  - Surface water Strategy – the applicant must consult Anglian Water to see what can and cannot be adopted especially with mention of SUDs.

This should be added to the section 3.10 Infrastructure and Services.

This should be added to section 4.8 SUDs.

### AMENDMENTS

- **Section 3.2** – refer to the Tree Preservation Order (rear of Eastfield Road), indicate location of the trees on Fig 3.2 and amend the layout on Fig 4.1 to accommodate the trees.
- **Para 3.7.3, add to the end:** in addition to access to existing facilities within the town.
- **Delete paragraph 3.10.2**
- **Add to section 3.10** that development must be in accordance with an agreed drainage strategy for Wellingborough East and that sewers must be kept in the public highway or public open space.
• Add to point 7, para 5.4.1: including long term maintenance.
• Paragraph 4.1.4 – add reference to the Eastern Relief Road being introduced as early as is practically possible and add a new paragraph to read: Work is also ongoing as part of the WEAST Transport Impact Assessment preparatory process, to evaluate the impact of the development on the wider highways network and determine appropriate mitigating measures. This will include the need to manage traffic along the Senwick Rd, Elsdon Rd and Eastfield Rd corridor and along Midland Road.
• Fig 3.6. The reference to MLM/Bovis will be deleted and replaced with “This information is based on a desktop review using information supplied by other parties. It provides a strategic overview and should not be relied upon for decision making purposes. Applicants are strongly advised to undertake their own geotechnical/ utility search investigations as part of the detailed planning process.
• Fig 4.1 and all consequential amendments: amend access from Finedon Road to provide no through route to residential area

SECTION 1. Introduction

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Comments</th>
<th>Response</th>
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<tbody>
<tr>
<td>Nathaniel Lichfield &amp; Partners on behalf of CEM</td>
<td>In summary, the document is thorough and well-illustrated, however, we are concerned that the document could be overly prescriptive in places. It is not always clear from the text and the drawings which key principles developers will have to adhere to and where developers will have the flexibility to interpret those principles. We note that, for example, Figure 4.2 is titled “Movement Framework” and Figure 4.4 is titled “Landscape Structure” which implies a fixed basis for taking forward development. These would be better presented as indicative options for taking forward the key principles highlighted in the development brief, but that the exact future form of the development may differ from that illustrated. We note that paragraph 1.2.2 aims to ensure that a high quality development is provided by creating a clear vision within which developer’s creativity “can flourish”. There is a need to ensure that this remains the case and that the key factors established by the brief do not place undue restrictions on development which, allied with your</td>
<td>The figures are indicative of how the planning and design principles can potentially be applied in practice. Paragraphs 1.4.1 and 1.4.2 make clear the purpose of the document to apply “detailed planning and urban design parameters and guidelines.” It is expected that detailed designs will evolve in relation to particular schemes within these parameters and guidelines as the planning and design process moves forward. Further clarification can be added to paragraph 1.2.2</td>
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</table>
concerns regarding decontamination and planning obligations, may render the development of the site unviable.

**AMENDMENTS**

- Paragraph 1.2.2 – add “Illustrative figures provided in Chapter 4 provide indicative solutions that show how the planning and design principles can potentially be applied in practice.”

**SECTION 2. Policy Review**

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<th>Respondent</th>
<th>Summary</th>
<th>Response</th>
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| The House Builders Federation | Paragraph 2.4.3  
With regard to the text, I would draw your attention to a recent appeal decision concerning a reference to the provision of lifetime homes on land at former RAF Quedgeley, Gloucester. In paragraph 27 of the decision notice (see attached copy) the Secretary of State said that “it is not appropriate to include this matter, for the reason that the internal layout of buildings is not normally material to the consideration of planning permission. PPG3 gives advice about the assessment of need for housing for specific groups including the elderly and disabled”.  
Furthermore, dwelling access arrangements are a Building Regulations matter, paragraph 3.5 of PPG12 states that local plans should not duplicate the provisions of other legislative regimes. Therefore, the policy should be deleted.  
The lifetime homes standard has no status as far as town and country planning legislation is concerned. | It is considered appropriate for the Borough Council to seek to negotiate provision of Lifetime Homes. Notwithstanding this, paragraph 2.4.3 and 2.4.2 need updating to reflect the current position with regard to Supplementary Planning Guidance. |
Whilst PPG1 refers to authorities taking into account access issues, it also recognises that much of this is dealt with by way of Part M of the building regulations. Paragraph 3.5 of PPG12 specifically states that development plan policies should not seek to duplicate the provisions of other legislative regimes and it specifically mentions the Building Regulations as one such regime. Developers must, as a matter of law comply with the Building Regulations and they are subject to frequent change and update unlike local plans. The purpose of the reference in paragraph 3.5 of PPG12 is to avoid confusion and potentially conflicting advice being given by different regulating authorities.

Thus whilst it may be appropriate for planning authorities to seek to negotiate with developers for a proportion of dwellings to be built to lifetime homes standards, it is considered excessive and unwarranted to require it.

**NCC**

**Paragraph 2.1.4 Overview**

This paragraph should make reference to Policies GS4, W1, W2 and W3 of the Northamptonshire County Structure Plan 1996-2016 (Adopted March 2001). Reference should also be made to Policies 1 – 7 of the Northamptonshire Waste Local Plan Revised Deposit Draft (November 2003).

**AMENDMENTS**

- Paragraph 2.1.4, add Policy W3 to the list of County Structure Plan Policies
- Paragraph 2.1.4, after the list of County Structure Plan Policies add: Waste Local Plan (Revised Deposit) 1, 5 & 7
- Paragraph 2.1.4, add Policies U14, U20, UH3, UH4, UH5 and UE1 to the Borough of Wellingborough Local Plan policies and delete reference to the Local Plan Alteration.
- Paragraphs 2.4.2 and 2.4.3 - delete both paragraphs and add three new bullet points to paragraph 2.4.1:
  - Planning out crime in Northamptonshire (adopted February 2004)
### SECTION 3. Site and Context Appraisal

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<th>Respondent</th>
<th>Summary</th>
<th>Response</th>
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<tr>
<td>M W Hardy</td>
<td>Welcomes the 2.5 hectares of allotment land to the rear of Eastfield and Finedon Road.</td>
<td>Noted</td>
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<td>Local Resident</td>
<td></td>
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<td>Wildlife Trust</td>
<td>Given that the brief covers building around an acknowledged site of nature conservation interest, and will therefore lead to increased disturbance of that site, we would have hoped that the development briefs would make reference to the instigation of a management plan for the nature conservation area which would maximise the nature conservation value of the area. We welcome the reference to the possible use of the site as an educational resource, and to a possible resource nature trial, but clearly increased access and usage of the site needs to be taken forward in as sensitive a manner as possible.</td>
<td>This is referred to in paragraph 5.4.1 point 6 and paragraph 5.5.1. It could however also be usefully highlighted in section 4.3</td>
</tr>
<tr>
<td>Nathaniel Lichfield &amp; Partners</td>
<td>Wellingborough Borough Council are due to carry out a comprehensive survey of the contamination risk on the site. The availability of funding to assist with this process is set out at paragraph 3.4.3 of the draft document. The document should include reference to the findings of this survey having potentially significant implications on the form of development for the site and possibly that the brief will need to be reviewed when the results are available.</td>
<td>Agreed, the adoption of this brief has been delayed to allow this.</td>
</tr>
<tr>
<td>Nathaniel Lichfield &amp; Partners</td>
<td>Commercial Estates supports the proposal in Figure 3.8 that the current access to Ambron House will provide an access opportunity to the site generally. It represents the best solution of providing access to development of the site.</td>
<td>Noted</td>
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Responses to East of Eastfield Road Development Brief
| Shoosmiths on behalf of Bruce Hilton | Page 36 – only part of my clients land is included as employment land, with some of my clients land being shown as allotments and other areas of railway related land (see plan in file) | Noted, Figure 3.12 will be revised to show the whole area referred to as employment land. |
| Shoosmiths on behalf of Bruce Hilton | Page 38 – map incorrectly identified part of my clients land as in multiple private ownership referring I assume primarily to the allotment land. | Noted, Fig 3.13 will be amended to reflect the boundaries provided. |
| Shoosmiths on behalf of Bruce Hilton | Page 40 – part of my client land is included within an area referred to as a potential constraint – why? | Refer to Appendix 2 which considers changes arising from Technical Reports |
| Shoosmiths on behalf of Bruce Hilton | Page 42 – clients site in shown in multiple ownership | Noted, Fig 3.15 to be amended to show the land as a business wishing to remain |
| Shoosmiths on behalf of Bruce Hilton | Page 36 – the map correctly identified the permission granted under your councils reference WP/2002/0571/0. The drawings on pages 38 and 42 do not recognise this area. | Agreed, as referred to above Fig 3.13 and Fig 3.15 will be amended. |
| NCC | Section 3.1 Historic context It is noted that the section describing the historic context of the site only discusses this in relation to its development from the late nineteenth century onwards, using two historic Ordnance Survey maps and one unattributed sketch map to provide snapshots of the site. This approach focuses on the recent context of the site but ignores any consideration of earlier activity or evidence, or the area’s potential for the survival of evidence in the form of buried archaeological remains. However, in view of the extent of previously-quarried land within the development site, there are unlikely to be any significant areas of earlier surviving remains, and this omission is not a major one. | A desk top archaeological survey has been undertaken – see Appendix 2 |
| NCC | Paragraph 3.2.8 Landscape and townscape assessment 3 The former quarry pit in the centre of the site The draft brief identifies this pit as being “designated as a Site of Nature Conservation Value”. It is noted that | For clarity it is considered that the site should have the nomenclature used in the Local Plan. |
national guidance issued by Defra on the naming of local designations advises that all locally designated sites should be known as “Wildlife Sites”. The brief could be revised in line with this advice.

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<tr>
<th>NCC</th>
<th>Paragraph 3.4.5 Ground conditions</th>
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<td>This paragraph states that no archaeological records are known to exist relating to the area. As a point of detail it is noted that the Northamptonshire Sites and Monuments Record details two known sites: 8416/2 (the nineteenth-century Ironstone workings) and 8426 (the former Brickworks). However, the County Council confirms that neither of these records are likely to have significant implications for development of the site.</td>
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<tr>
<th>NCC</th>
<th>Paragraph 3.10.2 Infrastructure and services</th>
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<td></td>
<td>It is noted that the individual utility bodies have not yet been consulted on this Draft Development Brief. The County Council urges that steps be taken as soon as possible to ensure that these bodies’ views are incorporated into these proposals.</td>
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</table>

| Anglian Water | At this time our water assets have sufficient capacity to deal with current needs. It is possible that some capacity exists within the system however such detail cannot be fully addressed until firm proposals and the type/nature of the development are provided such as number and size of dwellings, whether any large water users are expected amongst the land earmarked for employment, where the access points to the site will be, where the development is likely to start first and what sort of development this is, time scale for construction/completion etc. An Investigation such as this is costly both in terms of finance and time and would not normally be carried out until the firm proposals listed above are received. | Noted Additional wording can be added to section 3.10 to reflect the need for further investigation in respect of infrastructure investment. |
It is clear through that given the scale of the development and the fact that it is predominantly positioned in an area that is currently just fields there is likely to be a significant amount of investment to be made on the existing infrastructure.

AMENDMENTS

- Add a new paragraph to section 4.3 highlighting the need for a management plan to be prepared for the Site of Nature Conservation Value.
- Section 3.4 add reference to any findings as a result of the ground investigations study.
- Paragraph 3.4.5 add ‘significant’ before archaeological.
- Fig 3.12 amend to show the land owned by Hilton Property as ‘employment’.
- Fig 3.13 amend to show the land owned by Hilton Property as ‘individual private landholdings’
- Fig 3.15 amend to show the land owned by Hilton Property as ‘Land where business owners wish to remain’
- Add to section 3.10 “Anglian Water advises that significant investment in water and sewerage infrastructure will be required and that an investigation of requirements will be undertaken once firm proposals are received. This will be undertaken as part of the Outline Planning Application review process.”

SECTION 4. Planning and Design Principles

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Comments</th>
<th>Response</th>
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<tbody>
<tr>
<td>Mark Sanders</td>
<td>The area between Ambron House and the rear of Eastfield Road properties no: 63 – 81 is currently a bank with brambles etc. This growth affords a certain amount of security to the houses in this stretch. It would be a shame to see this cleared away.</td>
<td>The brief does not currently specify the type of boundary treatment, as this would be dealt with at the detailed planning application stage. However additional wording can be added: “Developers should give consideration to retaining a natural feel to the rear garden boundaries of Eastfield Road properties where these abut the proposed back gardens of new adjacent properties through the use of hedges and where possible retaining the existing bank and vegetation.” Notwithstanding this it may not be practical to retain the brambles. Security should not be</td>
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<tr>
<td>Name</td>
<td>Statement</td>
<td>Comments</td>
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<tr>
<td>Sue Sanders</td>
<td>Currently at no: 73, we enjoy a private rear garden with thick boundary planting and only factory warehousing to the rear. However, the outline plans indicate a three storey building is proposed to the rear of the property. The design of the three storey buildings will encourage a community aspect, however privacy will be lost to no: 73. If the property was to be only 2 storeys, we could cope.</td>
<td>3 storey development was proposed to frame the adjacent formal open space. This can still be achieved with 2 or 2½ storeys and the Fig 4.9 can be amended accordingly.</td>
</tr>
<tr>
<td>Mark Sanders</td>
<td>Concern over 3-storey houses overlooking previously private gardens below Ambron House</td>
<td>The impact on existing dwellings will be carefully considered at the detailed application stage. Notwithstanding this Fig 4.9 will be amended.</td>
</tr>
<tr>
<td>M W Hardy</td>
<td>The report calls allotment land, land for food production. This is a short-sighted definition, as to local residents food production is merely part of a very valuable asset.</td>
<td>Agreed, Principle 4 (page 45) and heading 4.4 (page 55) should be changed to ‘Quality Allotments’ and reference to “food&quot; deleted.</td>
</tr>
<tr>
<td>M W Hardy</td>
<td>The idea of setting up a trust to compulsory purchase land and then rent it back to present owners is ridiculous. Present workers of the land do so without need or use of a trust to regulate their activities. As for vacant plots, these could be put into use.</td>
<td>The requirement to consolidate allotments is necessary to ensure the efficient use of land. The current situation can not provide for maintenance of parking, shared areas, water, storage etc. It may be possible to still have freehold ownership, but would need to have certain conditions for management of allotments. The aim is to ensure allotment holders have better facilities than currently.</td>
</tr>
<tr>
<td>M W Hardy</td>
<td>The footpath shown for new housing to Finedon Road via Church headland entrance would need to be properly fenced in order to prevent unlawful access for theft or misuse. Motor vehicle access is needed for plot holders, tractors etc.</td>
<td>Paragraph 4.4.2 refers to the need for the allotments to be secure, and the need for a servicing and parking area.</td>
</tr>
<tr>
<td>Mr Hardy</td>
<td>Security of allotment land is important.</td>
<td>Agreed, this is referred to in paragraph 4.4.2.</td>
</tr>
<tr>
<td>Mr &amp; Mrs Chalmers</td>
<td>There should be access for cars and trailers/tractors, also there is a need for car parking at the rear of the allotments. This will also be useful for fire units as well.</td>
<td>Agreed, the need for servicing and parking is referred to in paragraph 4.4.2</td>
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<tr>
<td>S Pelling</td>
<td>Access to the rear of properties in Mill Road and</td>
<td>Para. 4.2.16 could be revised to include: “During the</td>
</tr>
<tr>
<td>Local Resident</td>
<td>Eastfield Road would relieve parking problems and improve the look of the outside of the properties. Traffic &quot;calming&quot; should not cause the traffic to jam up Eastfield Road, it will still be a main route for the town.</td>
<td>Detailed traffic calming measures will be worked up in consultation with residents to confirm the preferred approach.</td>
</tr>
<tr>
<td>Nathaniel Lichfield &amp; Partners</td>
<td>In terms of the urban structure, it is not clear whether developers will be required to exactly follow the pattern of streets and spaces shown on the drawings. The principles of a hierarchy of streets and spaces (section 4.2) with a main formal ‘avenue’ through the site are consistent with current design advice, however, there needs to be the flexibility for developers to vary the layout and position of local streets, mews, squares, etc. The same applies to the specific location of the LEAP. It would be sufficient to indicate size and general location (i.e. easily accessible to proposed residential areas). Flexibility can be provided to developers without compromising the design principles and the document could be better worded to enable this.</td>
<td>The principle of the proposed urban design approach - the overall layout shown, approach to street typology and general location of the LEAP are to be applied and have been subject to consultation / participation with a range of stakeholders. As expressed in para 1.2.2 it is intended that flexibility be applied to enable a high quality scheme to come forward.</td>
</tr>
<tr>
<td>Shoosmiths on behalf of Bruce Hilton</td>
<td>The illustrative masterplan shows the private access road to the east of my client’s property which also serves the adjoining industrial property to the south of my clients land then continuing to serve residential property. I am instructed that that area of land on which residential property is located does not have a right way to access across my client’s private accommodation road. Furthermore the location of the existing access is significantly improved to form an adoptable highway and serving both residential and business use would inevitably cause problems of highway safety caused by heavy goods vehicles turning and manoeuvring in close proximity to existing industrial units and a conflict</td>
<td>As referred to above this will be amended</td>
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<td>Source</td>
<td>Response</td>
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<tr>
<td>Shoosmiths on behalf of Bruce Hilton</td>
<td>The illustrative masterplan fails to recognise their outline permission referred to above including part of my clients land as live/work. Clearly this is part of the masterplan cannot be accommodated as a part of the site has an outline consent for an additional employment unit and the remainder of the land is used to access both the northern side of my clients premises for heavy goods vehicles. Agreed, Figure 4.1 needs to take account of the existing consent.</td>
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<tr>
<td>Nathaniel Lichfield &amp; Partners</td>
<td>Figure 4.1 Illustrative Masterplan indicates footpaths between the LEAP and open space around pond that may not be achievable due to changes in level. It is however noted that these links are not shown on the Figure 4.2 Movement Framework. This will be revised following topographical survey.</td>
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<tr>
<td>NCC</td>
<td><strong>Paragraph 4.1.4 Strategic route network</strong>&lt;br&gt; It is noted that protecting the existing and future community from extraneous traffic, particularly HGVs along Eastfield and Elsdon Roads, will be critical, therefore ensuring a sustainable layout to maximise the benefits of the Eastern Relief Road will be an important consideration. Noted</td>
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<tr>
<td>NCC</td>
<td><strong>Paragraphs 4.1.5 and 4.1.6 Pedestrian and cyclist circulation</strong>&lt;br&gt; The County Council supports the proposed north-south cycle/pedestrian link between Mill Road and Finedon Road, and upgraded link to the station. The improved links on desired lines through the development are also supported. Road layouts should be designed to be cycle friendly, and should be subject to cycle audit. Noted</td>
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<tr>
<td>NCC</td>
<td><strong>Paragraph 4.1.8 Public transport</strong>&lt;br&gt; There are likely to be some areas towards the east of the site which are more than 300 metres walk from a bus If the bus route on Eastfield Road is reinstated, as proposed in para 4.1.8, then all of the development will</td>
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stop; it is therefore critical that Eastfield Road itself is re-integrated into the bus network, and it may be preferable to have an urban route through the site which would necessitate careful design of the avenue/local street hierarchy in the area.

The County Council would like to see this paragraph expanded to read:

“In areas of significant development, developers need to work with the bus operators and the County Council's Sustainable Transport team at an early stage to ensure the highway network serving the development is designed to accommodate bus routes which are capable of becoming commercially viable at a reasonable frequency, at least during Monday to Saturday daytimes. Such routes will need to:

- Serve the maximum possible catchment area and link appropriate origins and destinations in the shortest possible time to attract the maximum possible revenue
- As short and quick as possible to reduce operating costs
- Funded through developer contributions during the period the development is being constructed and patronage is building up.

During the construction period, the road network should be constructed so that public transport can serve each area of the development before any of that area is occupied.”

be within 300m of a bus stop (Figure 4.2 will be revised to show this). It is therefore not considered necessary to route a bus service through the site.

Agreed

NCC

Section 4.2 A framework of streets and squares

The proposed width of Avenues at 5.5m would not be sufficient for HGV's accessing Work place areas – a

Further discussions have taken place with the County Council. It is necessary to seek an appropriate balance
<table>
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<tr>
<th>Responses to East of Eastfield Road Development Brief</th>
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<tr>
<td><strong>width of 7.3m is necessary. There are also concerns</strong></td>
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<td><strong>about how deliveries are to be made to ‘Live-Work’ units</strong></td>
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<tr>
<td><strong>accessed from 4.8m local roads. Unfortunately, deliveries</strong></td>
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<tr>
<td><strong>are often made by large vehicle and it would be</strong></td>
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<tr>
<td><strong>impossible for two such vehicles to pass one another on</strong></td>
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<td><strong>a road of this width. It would also be difficult for vans or</strong></td>
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<td><strong>trucks up to 7.5 tonnes GVW as well as people carriers</strong></td>
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<td><strong>and off-road vehicles etc. The width of lorries and buses</strong></td>
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<td><strong>from wing mirror to wing mirror is usually 3.0m and that</strong></td>
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<td><strong>of vans &amp; minibuses about 2.6m. If these minimum</strong></td>
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<td><strong>widths are not met road users tend to drive over kerbs</strong></td>
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<td><strong>and on to verges etc, with consequences for long term</strong></td>
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<td><strong>maintenance and structural integrity of the carriageway.</strong></td>
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<tr>
<td>The problem of very large vehicles trying to deliver to</td>
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<td>‘Live-Work’ units could be overcome by having a local</td>
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<td>transhipment area associated with the nearest</td>
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<td>employment area.</td>
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<td><strong>between meeting the needs of highway users and</strong></td>
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<tr>
<td><strong>ensuring layouts are not overly dominated by highways.</strong></td>
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<tr>
<td><strong>The widths of the avenue cross sections will be amended</strong></td>
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<td><strong>to 6m.</strong></td>
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<tr>
<td><strong>NCC</strong></td>
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<tr>
<td><strong>Paragraph 4.2.13 Construction Access</strong></td>
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<tr>
<td>The County Council would support the management of</td>
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<td>construction traffic through the development of a routing</td>
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<tr>
<td>plan for lorries for each phase of the development. This</td>
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<td>plan will need to show routes that have to be followed</td>
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<td>into and out of the site extending out to the Strategic</td>
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<tr>
<td>Road Network (i.e. the A45, M1 and A14). It will also</td>
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<td>need to be referred to in contracts let for bulk haulage of</td>
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<td>soil, for supplies of construction materials, bringing plant</td>
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<td>to the site and for any businesses that are established as</td>
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<td>part of the development.</td>
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<tr>
<td><strong>Agreed this is an important issue. Suggest a sentence is</strong></td>
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<tr>
<td><strong>added to end of para 4.2.13 “The preparation of a routing</strong></td>
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<td><strong>plan for construction-related lorries for each phase of the</strong></td>
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<td><strong>development will be required showing ingress/egress and</strong></td>
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<td><strong>extending to the strategic road network.”</strong></td>
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<tr>
<td><strong>Nathaniel Lichfield &amp; Partners</strong></td>
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<tr>
<td><strong>There are a number of issues in relation to the provision</strong></td>
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<td><strong>of parking that, whilst seeking to achieve the desirable</strong></td>
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<td><strong>objective of reducing the dominance of parked cars and</strong></td>
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<td><strong>garages within the streetscene, are overly restrictive. To</strong></td>
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<td><strong>insist that garages are set on the rear property line is too</strong></td>
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<tr>
<td><strong>onerous. It is sufficient to say that all garages should be</strong></td>
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<td><strong>It is considered that the Brief should maintain a strong</strong></td>
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<tr>
<td><strong>line of guidance on parking and garages and the look of</strong></td>
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<td><strong>frontages. It is suggested that paragraph 4.2.20 is</strong></td>
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<tr>
<td><strong>expanded to clarify the situation.</strong></td>
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<tr>
<td><strong>Para. 4.2.20 (third bullet – first sentence) to be revised:</strong></td>
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<tr>
<td><strong>Recessed by at least 1m from the front elevation, this would give developers and their architects greater flexibility in the design of their house types and an opportunity to create continuous frontages and maintain enclosure. It is noted that the image at Figure 4.8 does not show garages set back on the rear property line. Many new developments successfully incorporate garages within the streetscene using colour and materials to minimise visual impact. The option of in-curtilage parking (accessed from rear parking courts) should also be included.</strong></td>
</tr>
</tbody>
</table>
| **“All garages must be set well back from the front elevation of the adjacent house. Design Bulletin 32 and supporting documents suggest that normally driveways serving garages should be long enough to accommodate a car parked in front of a garage and allow the garage door to be opened without the car having to project beyond the curtilage onto a footway. The length should preferably be 6m or at least 5.5m. However, this needs to be carefully handled to create continuous frontages and maintain street enclosure. The use of devices such as archways can help in this respect.” [include new photo]  
To add a seventh bullet point “in curtilage parking where accessed from rear parking courts only – on land that would otherwise be the back garden.”** |

| **NCC** | **Paragraphs 4.2.28 Lorry Parking**  
In relation to employment areas, consideration needs to be given to setting aside small scale, secure lorry parking areas for the use of vehicles calling early at factories. These might be combined with transhipment areas for the small businesses.  
A secure lorry parking area is proposed north of Finedon Road. It is considered in this location that roadside parking bays or laybys would be sufficient. This should be added to paragraph 4.2.28.** |

| **Nathaniel Lichfield & Partners** | **Paragraphs 4.5.7 to 4.5.13 consider the provision of affordable housing on the site and state that the percentage to be provided will be determined in accordance with the forthcoming Affordable Housing SPG.**  
We are concerned that the wording of this section is unduly onerous in that it does not make reference to the need for affordable housing provision on individual sites to be sought by way of negotiation and on up to date housing needs information (as set out in the draft Affordable Housing SPG). It will be important to emphasise that the mix of housing types and phasing should be considered as part of the determination of planning applications to ensure that the best use is made of this section will be amended to ensure consistency with the Affordable Housing SPG, which recognises that affordable housing provision needs to be negotiated taking into account the details relevant to individual sites.** |
of available land and that site specific constraints are taken into account. The suggestion for “pepper potting” for example, may not provide the best possible solution for the development of the Eastfield Road site and may not be acceptable to Registered Social Landlords.

4.5.12 - LE

The House Builders Federation

It is stated that there will be a requirement for a proportion of the affordable housing to meet the needs of the black and minority ethnic population and key workers. It is not clear what exactly is meant by this reference. Affordable housing provision normally seeks to address the various housing requirements of the wider general population, which will include people from many different ethnic backgrounds, together with those with different types of disabilities and needs.

It is proposed to increase the supply and availability of affordable housing in the east of the town to meet the specific locational and support needs of the black and minority ethnic population. Whilst it is the aim of the Council to secure affordable housing for the needs of this element of the population and key workers within WEAST, it is not intended that provision should be exclusive of the need to meet the various housing requirements of the general population but to highlight priority areas within the general requirement.

4.5.6 & 4.5.10 - LE

The House Builders Federation

The Development Brief should accord with the relevant policies in the adopted Local Plan, as supplemented by the SPG on Affordable Housing. Policy H8 of the Local Plan indicates that provision should be negotiated having regard to a number of factors, including site and market conditions. The Development Brief will therefore be amended to be consistent with Policy H8 of the Local Plan and the supporting SPG on Affordable Housing.

The preferred option outlined in para 4.5.10 of the Development Brief is taken from the draft SPG on Affordable Housing dated October 2003. Prior to the adoption of that document in July 2004, changes were

In relation to the provision of social rented and shared ownership housing it is stated that the Council’s preferred

The Development Brief should accord with the relevant policies in the adopted Local Plan, as supplemented by the SPG on Affordable Housing. Policy H8 of the Local Plan indicates that provision should be negotiated having regard to a number of factors, including site and market conditions. The Development Brief will therefore be amended to be consistent with Policy H8 of the Local Plan and the supporting SPG on Affordable Housing.

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The preferred option outlined in para 4.5.10 of the Development Brief is taken from the draft SPG on Affordable Housing dated October 2003. Prior to the adoption of that document in July 2004, changes were
Responses to East of Eastfield Road Development Brief

| The House Builders Federation | 4.5.11 | It is stated that in terms of its affordable housing requirement, the Council requires 75% social rented accommodation and 25% shared ownership housing. These requirements are contrary to the guidance set out in Circular 6/98 and the proposed changes to PPG3, which emphasise the importance of avoiding tenure prescription.

The precise requirements seem at complete variance with paragraph 3.10.1 of the Station Island Draft Development Brief which states that “a significant need has been established for different types of ‘affordable housing’, whether social rented, shared ownership of low-cost market housing”.

Tenure prescription is contrary to Circular 6/98, although the consultation paper on PPG3 does indicate that it will be appropriate to specify tenure where to do so would address an identified need that would not be met by other types of affordable housing. The SPG on Affordable Housing indicates that the 75% and 25% figures reflect the priority needs of the borough and, does not put these forward as a requirement. In contrast, the draft Development Brief indicates (para 4.5.11) that these figures must be adhered to and does therefore seek to specify tenure, contrary to Circular 6/98. The wording of the Development Brief is therefore to be amended to eliminate conflict with the SPG on Affordable Housing and paragraph 4.5.11 will be deleted. |

| Housing Strategy Officer | 4.5.11 – Table needs amending to read 14% flat and 86% houses outside the table. The figures inside should be 12% for 1 bed, 39% for 2 bed, 44% for 3 bed and 5% for 4/5 bed this is for both houses and flats. | As referred to above this table will be deleted. The breakdown of provision will be negotiated based on the housing needs information. |

| Shoosmiths on behalf of | Page 52 & 53 refer to a wildlife corridor or nature | The nature conservation area identified in Figure 4.4 |
Bruce Hilton

The nature conservation area of wildlife corridor referred to at paragraph 4.3.2 in its northern most part follows the line of your proposed new access road. I can therefore see the point of a cycleway link through such an area as designated in your Local Plan and referred to at page 30 but I can see no nature conservation interests being protected by forming a new vehicular access through this area. It is perhaps worth noting at paragraph 4.3.6 that is an important part of your Local Plan that you respect the typography of the site. You specifically refer to roads being aligned to minimise environmental impact and cut and fill. This does not equate with a line for such a vehicular access route as a detailed site inspection would show.

There is also the question of impact and it would appear from your own document that there are substantive reasons why such an access road should not be considered and other alternatives considered.

Secured by Design – through roads in development make crime easier to commit – “they provide choice of alternative escape routes from the scene of the crime, rather than obliging the offender to return by the way he came. The opportunity to take a different route given him the anonymity and safety he seeks, as opposed to the dangers of returning the same way, here he may have already been noticed. The more alternative routes there are, the more confident the wrongdoer feels, and the easier it is to commit crime”

NCC

Paragraphs 4.5.14 and 4.5.15 Density

The County Council notes that reference is made in these paragraphs to “gross” density calculations. In accordance with paragraph 58 of PPG3 Housing (March 2000) and Policy H6 of the Northamptonshire County

Agreed. The word “gross” in paras 4.5.14 and 4.5.15 to be replaced with “net site.” To add footnote, for the definition of “net site density” applicants are referred to Annex C of PPG 3: Housing.”
<table>
<thead>
<tr>
<th>Response</th>
<th>Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nathaniel Lichfield &amp; Partners</td>
<td>Figure 4.9: Building heights indicates that 3-4 storey buildings are acceptable in the key, although these are not shown on the plan itself. Agreed the layout should be revised.</td>
</tr>
<tr>
<td>NCC</td>
<td>Paragraph 4.7.2 Promoting recycling and Paragraph 3.10.4 Infrastructure and services. The reference to a recycling facility should be expanded to reflect Policies 4, 6 and 7 of the Northamptonshire Waste Local Plan Revised Deposit Draft (November 2003). Reference should be made to facilities for on-site or nearby treatment of local waste generated and neighbourhood waste management facilities that minimise the generation of waste by providing for the separation, storage and collection of waste for re-use, recycling and treatment. Paragraph 4.7.2 could usefully be expanded.</td>
</tr>
<tr>
<td>The House Builders Federation</td>
<td><strong>4.7.2</strong> It is stated that a centrally placed neighbourhood recycling facility should also be provided. It is considered reasonable for the Council to stipulate external space requirements for the storage of wheelie bins and recycling infrastructure, as this is to do with the use of land and so within the remit of the town and country planning acts. However, internal layouts and standards are not. Circular 1/97 sets out various tests of reasonableness and what is necessary in order for development to proceed as these sorts of requirements are usually sought through the use of planning obligations. If the Council is actually requiring the provision of the actual recycling equipment itself or funding towards the operation of recycling schemes, the HBF firmly considers that these are more properly matters for the Waste Para. 4.7.1 requires that the need to store recycling storage containers (bins/boxes provided by the Council) are designed-in from the outset. Para. 4.7.2 requires a neighbourhood recycling facility sensitively designed-in to the core area. Further clarification is proposed as an amendment to paragraph 4.7.2 S106 can provide for things that are negotiated.</td>
</tr>
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</table>

*Responses to East of Eastfield Road Development Brief*
Authority. Again, 1/97 applies in terms of what is necessary, relevant to planning, directly related to the development proposed, fairly and reasonably related in scale and kind to the development proposed and reasonable in all other respects. Also, PPG12 applies (paragraph 3.5) which stipulates that development plans should not duplicate the provisions of other legislative regimes if these things are more properly the responsibility of the Waste Authority.

The provision of actual recycling equipment is the responsibility of the Waste Authority who has a duty to provide it. Indeed, the waste legislation means that no one else can be responsible for it.

| Nathaniel Lichfield & Partners | There is a requirement for a centrally located waste recycling facility to be provided. The central areas of the site are indicated as being for residential and recreational use and there is an apparent conflict in terms of residential and visual amenity. A better location may be within the existing/proposed employment area which, although not centrally located, may be more suitable and is only 4-500m from the southernmost part of the site. | Agreed, the actual location would be negotiated. The principal aim will be for it to be conveniently located. |
| The House Builders Federation | 4.7.4 - LE  
With regard specifically to sustainable use of energy, the HBF would make the following points:  

Stipulation of Design Criteria  
The house-building industry is supportive of the need to consider energy efficiency, or the incorporation of energy efficient technologies (where relevant) as part of the design process. Indeed HBF is pleased to see Planning encourage proper consideration of energy efficiency to be made within development design. However, HBF do not consider that stipulations of investigation, and/or  

Draft PPSI recognises that sustainable development and design includes resource efficiency Para 1.27 states that design policies should “make efficient and prudent use of natural resources”.  

One of the intrinsic benefits of the BREEAM ratings scheme is that the developer is given flexibility to determine what environmental measures are incorporated to attain the necessary minimum “very good” Ecohomes rating (as set out in Appendix B). Whereas it is acknowledged that Part L of the Building Regulations encourages energy efficiency, the ‘Ecohomes’ concept embraces a wider definition of environmental sustainability – relating to transport and |
<table>
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<tr>
<th>Incorporation of certain types of technologies (e.g. combined heat and power schemes or condensing boilers) should be made within planning legislation.</th>
<th>External open space. There is no evidence this will delay deliverability of the scheme. On the contrary, there is every likelihood that this will lead to a more successful, attractive and marketable place.</th>
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<tbody>
<tr>
<td>Stipulations of design criteria (for example: on the use of insulation, triple glazing or low emissivity glazing or on the construction, usage and heating of conservatories) should be avoided, as they are invariably all Building Regulation matters.</td>
<td>Given this flexible approach focused on attaining environmental outcomes, specific measures relating to detailed building design are not specified as essential pre-requisites. The Council is, however, keen to encourage best practice and has therefore adopted the “Building Better Places” SPG which details how this can be attained. Appropriate cross-references are made to this document.</td>
</tr>
<tr>
<td>Regulations for new homes have recently been subject to review and will continue to be updated in line with the country’s carbon reduction targets.</td>
<td>A key aim of the planning system is to contribute to the achievement of sustainable development. A concise report provided by developers would help to speed up the system by providing all relevant information upfront.</td>
</tr>
<tr>
<td>Stipulations of the incorporation of certain types of technologies should also be avoided, as other development design criteria, or supply industry issues, may hold greater importance and make the technology’s use unviable or impossible for inclusion. Global stipulation might also be seen as preventing market competition, innovation and improvement!</td>
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<td>HBF would also argue against any request for sustainability reports for new development within the planning process for new homes, as it considers that the review and conflicts raised by discussions over the numerous issues associated will slow down the planning process for no good purpose, given that the regulatory responsibilities for carbon savings and energy efficiency are contained within the building control system.</td>
<td></td>
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<tr>
<td>A key aim of the planning system is to contribute to the achievement of sustainable development. A concise report provided by developers would help to speed up the system by providing all relevant information upfront.</td>
<td></td>
</tr>
<tr>
<td>Wellingborough Partnership</td>
<td>This issue is considered in the Building Better Places SPG and in the minimum requirement to attain a BRE “very good” rating additional text will be added.</td>
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In terms of energy reduction, mention is made of both solar power and building energy efficiency. It is possible to include requirements on the efficient use of energy within buildings, in particular the choice of boilers.
<table>
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<tr>
<th>Wellingborough Partnership</th>
<th>Street, etc. lighting – has consideration been given to the light pollution effect from these developments? The choice of lighting should minimise this impact and be energy efficient.</th>
<th>Agreed, this issue is considered in the Building Better Places SPG appropriate cross references will be included by the inclusion of a new paragraph.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wellingborough Partnership</td>
<td>When considering SUDS provision, consideration should be given to the collection of rain water for later irrigation of green spaces</td>
<td>This can be added to para 4.8.4</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>Sustainable Urban Drainage</td>
<td>Agreed, this should be added to section 4.8.</td>
</tr>
<tr>
<td></td>
<td>1. The overall surface water runoff strategy should incorporate SUD’s solutions wherever possible</td>
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<td>2. All SUD’s solutions adopted should be to the latest best practice as noted in CIRIA documents C522 &amp; C523 entitled SUD’s, Design Manual for England and Wales and SUDS, Best Practice Manual respectively.</td>
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<td>3. The Environment Agency shall seek to ensure that strategic maintenance and legal agreements are in place for all SUD’s asset prior to any development commencing on site.</td>
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<td>4. The legal agreements for the SUD’s will have to implemented via heads of terms in any S106 agreement for the development site(s)</td>
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</tbody>
</table>
| The House Builders Federation | **Paragraphs 4.3.2 & 4.8**  
The HBF and its member companies are keen supporters of the concept of SUDS and seek to implement them wherever this is practicable. However  
the implementation of SUDS and their adoption are processes that involve separate bodies and consequently this is where the problem arises.  
Most Planning Authorities require the integration of SUDS into developments, however it is the adoption which is controlled under Building Regulations (and/or other relevant Construction/Public Health legislation). | It is an essential pre-requisite of development that sustainable urban drainage techniques are adopted. It is acknowledged that adoption is a complex issue requiring agreement of a number of parties. Case studies elsewhere show how successful solutions can be implemented. We agree that this requires thorough consultation and good communication. Section 4.9 will be re-drafted to emphasise this. Adoption procedures will need to be confirmed prior to planning permission being granted. SUDS are “required” by Policies AR8 of CSP. |
If the Planning Authority imposes conditions which require developers to provide SUDS, and Local Building Control, Highway Authority and or the Water Company are reluctant to adopt SUDS. It is clear that this will leave developers in a situation where although Planning requirements have been satisfied, the SUDS will not be adopted by water companies and local authorities.

In view to the practical problem it is clear that to require provisions in all circumstances would frustrate development. Developers should not be expected to deal with the long-term management and administration systems involved in the successful operation of SUDS. Until such a time as a suitable mechanism for dealing with the adoption of SUDS schemes is established policies should require either to;

(i) “encourage” the use of SUDS; or
(ii) “seek the implementation of sustainable drainage systems wherever practicable”

rather than require in all circumstances.

As such the HBF consider Authorities planning system should promote better communication channels, and early communication and liaison between all parties to aid the incorporation of SUDS. Any guidance issued should encourage the use of SUDS but should not impose the use of SUDS until such time as other stakeholders, especially those agencies who will be responsible for their long-term maintenance, accept them.

AMENDMENTS

- Figure 4.1 redesign the northern area currently shown as live work to an employment area to take account of existing consents.
- Figure 4.1 review footpaths shown around the LEAP following topographical survey and ensure consistency with Fig 4.2
• Figure 4.2 amend to show development within 300m of a bus stop.
• Add after paragraph 4.1.8: “Developers need to work with the bus operators and the County Council’s Sustainable Transport team at an early stage to ensure the highway network serving the development is designed to accommodate bus routes which are capable of becoming commercially viable at a reasonable frequency, at least during Monday to Saturday daytimes. Such routes will need to:
  • Serve the maximum possible catchment area and link appropriate origins and destinations in the shortest possible time to attract the maximum possible revenue
  • As short and quick as possible to reduce operating costs
  • Funded through developer contributions during the period the development is being constructed and patronage is building up.
  During the construction period, the road network should be constructed so that public transport can serve each area of the development before any of that area is occupied.”
• Figure 4.3 amend cross section of the avenue to 6m.
• Paragraph 4.2.13 add to end “The preparation of a routing plan for construction-related lorries for each phase of the development will be required showing ingress/egress and extending to the strategic road network.”
• Add to section 4.3: “Developers should give consideration to retaining a natural feel to the rear garden boundaries of Eastfield Road properties where these abut the proposed back gardens of new adjacent properties through the use of hedges and where possible retaining the existing bank and vegetation.”
• Amend principle 4 (page 45) and title 4.4 to read: Quality Allotments
• Para. 4.2.16 revise to include: “During the detailed design process developers will be encouraged to explore ways of relocating car parking from Mill Road to the rear of houses to better serve residents. Though more difficult to achieve, consideration should also be given to applying this to Eastfield Road properties.”
• Para. 4.2.20 (third bullet – first sentence) to be revised: “All garages must be set well back from the front elevation of the adjacent house. Design Bulletin 32 and supporting documents suggest that normally driveways serving garages should be long enough to accommodate a car parked in front of a garage and allow the garage door to be opened without the car having to project beyond the curtilage onto a footway. The length should preferably be 6m or at least 5.5m. However, this needs to be carefully handled to create continuous frontages and maintain street enclosure. The use of devices such as archways can help in this respect.” [*include new photo]
• Paragraph 4.2.20 add a seventh bullet point “in curtilage parking where accessed from rear parking courts only – on land that would otherwise be the back garden.”
• Paragraph 4.2.28 add “within the employment areas provision should be made for roadside parking bays or lay-bys”.
• Paragraph 4.4.2, 2nd sentence, delete ‘food’
• Paragraph 4.5.8 – replace with: Affordable Housing shall be provided in accordance with Policy H8 of the Local Plan as supplemented by the Supplementary Planning Guidance on Affordable housing.
• Paragraph 4.5.9 – add reference to the Wellingborough East Housing Needs Study 2004 and delete ‘draft’ after reference to the Development Brief.
• Paragraph 4.5.10 – delete the first two sentences from ‘The percentage….Affordable homes’ and replace with ‘Supplementary planning Guidance on Affordable Housing includes a target for the provision of affordable housing that will be sought by the Borough Council. These homes...’
• Paragraph 4.5.10 - delete last sentence and replace with “It may, however, be appropriate to exceed this limit where, for example, sheltered accommodation is proposed or mixed tenure within a block of flats is problematic.”
• Paragraph 4.5.11 – delete paragraph and table
• Paragraph 4.5.13 – replace ‘A proportion….is also’ with ‘The Borough Council will negotiate for at least 10% of affordable housing ...’
• Paragraphs 4.5.14 and 4.5.15 The word “gross” to be replaced with “net site.” To add footnote, for the definition of “net site density” applicants are referred to Annex C of PPG 3: Housing.”
• Figure 4.9 show 3-4 Storey development on the plan
• Figure 4.9 show buildings rear of 68-81 Eastfield Road as 2 or 2½storey
• Expand paragraph 4.7.2 to read: A neighbourhood recycling facility should also be provided. This should enable items to be brought for later recycling and include the traditional bottle bank as well as the possibility of local composting and should complement the kerbside system in operation. Detailed design, size and location will need to be discussed with the Borough Council. It should be integrated into the public space landscape and have suitable HGV access.
• Section 4.7 - add a new paragraph to read: Energy efficiency As set out in Chapter 5.1, the Council will require high standards of energy efficiency to be applied by seeking to attain a minimum ‘very good’ BREEAM rating. The Council’s “Building Better Places: How to Contribute to Sustainable Development”, adopted as Supplementary Planning Guidance, provides further advice to applicants on how to achieve high standards. This not only covers building layout and specifications, but also advice on energy efficient street lighting, for instance.
• Add to end of section 4.8: The Borough Council will seek to ensure that strategic maintenance and legal agreements are in place for all SUDs assets prior to any development commencing on site. All SUDs solutions adopted should be to the latest best practice as noted in CIRIA documents C522 & C523 entitled SUDs, Design Manual for England and Wales and SUDS, Best Practice Manual respectively. Negotiations regarding adoption of SUDs is likely to involve the Borough Council, Environment Agency and Anglian Water.
• Paragraph 4.8.4 – refer to rainwater being used for irrigation of green spaces.
## SECTION 5. Proposed Development Process

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Comments</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nathaniel Lichfield &amp; Partners</td>
<td>Section 5.7 outlines the range of issues on which developers will be required to contribute by way of a Section 106 Agreement. There is a need to ensure that these are fairly and reasonably related to the phase and scale of development to which they relate.</td>
<td>Agreed, this is clearly stated in paragraph 5.7.1 and in the SPG on Planning Obligations</td>
</tr>
<tr>
<td>NCC</td>
<td>Paragraph 5.7.2 Outline of planning obligations</td>
<td>Agreement, a new waste management item will be added to paragraph 5.7.2</td>
</tr>
<tr>
<td></td>
<td>The County Council would support the inclusion of an additional criterion in the list of matters set out in Paragraph 5.7.2 that requires developers to provide new homes with composting bins and information on how to use them, the bins being replaced as necessary for the first five years.</td>
<td>Noted</td>
</tr>
<tr>
<td></td>
<td>The inclusion of Archaeology as one of the matters to be dealt with through a legal agreement is to be welcomed. However, in view of the extent of previous development and quarrying within the area covered by this Draft Development Brief, it is unlikely that the development will have significant historic environment implications or that further archaeological measures would be required as a planning obligation. Archaeology could, therefore, be removed from the list of matters.</td>
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</table>

### AMENDMENTS

- Paragraph 5.7.2 add waste management
## APPENDICES

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Comments</th>
<th>Response</th>
</tr>
</thead>
</table>
| NCC            | Appendix A – National Guidance  
Reference should be made to PPG 10: Planning and Waste Management (September 1999). | Whilst this may well be relevant, it is not considered to be one of the key PPGs affecting this site.                                       |
| Wildlife Trusts| In essence, two of the briefs seem to be inaccurate in two thirds of the points they allocate for ecology. Further to that, in all three briefs the sum of the land use and ecology section is given as a maximum of 27, despite the fact that only 15 points are actual listed, of which 6 are spurious. | The comment incorrectly interprets Appendix B, which merely replicates the BRE Ecohomes checklist and indicates the weightings that BRE apply to each criterion. It is not a WEAST-specific scoring exercise. Specifying the environmental design measures required to attain the minimum “very good” rating is the developer’s responsibility. |

### AMENDMENTS

None
## Proposed Changes Arising from Technical Reports

<table>
<thead>
<tr>
<th>REPORT</th>
<th>KEY TECHNICAL ISSUE</th>
<th>PROPOSED CHANGE ARISING</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Ground Engineering &amp; Geo Environmental Assessment (Nichols Colton)</td>
<td>• Significant levels of soil contamination have been identified at several locations within the site.</td>
<td>• Results of contamination should be highlighted in the Development Brief. It is clear that the whole area will need ground remediation. However, although this study usefully provides a further level of understanding of the existing contaminants, the need for remediation of the whole site was suspected prior to publishing the Draft Brief and the planning proposals premised on this basis. No change to the planning proposals and indicative layout are therefore required. The presence of significant levels of contamination in the allotment land does lend further justification for the need to upgrade the existing allotments, including the land where retention for allotment cultivation is proposed.</td>
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</table>
| 2 Ground Engineering & Geo Environmental Assessment: Interpretive Report (Bullens) (August 2004) | • The report identifies three “locations where construction may affect slope stability” - the top of the slope to the west of the pond - the proposed ‘landmark building’ site to the north-east of Plumbco, south of the Finedon Road roundabout - a small parcel south of the former quarry pit  
• The area east of the pond is identified as requiring “piles up to 10m deep” due to the geotechnical conditions.  
• Significant levels of soil contamination have been identified at several locations within the site. This includes potentially harmful concentrations of contaminants found in some of the allotment land. | • It is proposed to leave these three identified locations free of development, to be included as part of the landscaped public open space network. All development briefs showing the indicative layout should be changed accordingly.  
• In this area where deep piling is necessary it is proposed to locate flats (instead of houses) to offset the increased construction costs. All development briefs showing the indicative layout should be changed accordingly. Higher density development in this location will also offset the elimination of development identified in the point above.  
• Results of contamination should be highlighted in the Development Brief. However, although this study usefully provides a further level of understanding of the existing contaminants, the need for remediation of the whole site was suspected prior to publishing the Draft Brief and the planning proposals premised on this basis. No change to the planning proposals and indicative layout are therefore required. |
| 3 Flood Risk Assessment (Posford Haskoning)                            | • The study confirms that there is no direct flood risk to the site itself.  
• A combination of on-site storage and ‘thin layer’ SUDS is suggested as the most robust and sustainable drainage solution. This is compatible with the strategy outlined in the report, which includes use of the pond as drainage retention. | • Figure 3.6 needs to be revised to show the up-to-date flood risk area. However, this has no material affect on the proposals. No other change is therefore proposed apart from refinement of the text explaining the proposed drainage strategy. |
<table>
<thead>
<tr>
<th></th>
<th>Archaeological Assessment (NCC)</th>
<th>• No evidence of archaeological remains has been found within the site.</th>
<th>• No change is therefore proposed.</th>
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<tbody>
<tr>
<td></td>
<td>Topographical / Buried Services Surveys (On Centre Surveys)</td>
<td>• This verifies the existence of a major sewer cutting across the north-easternmost part of the site, as indicated in Figure 3.14. Without further engineering verification we understand this is the only service routing within the site that poses a significant constraint.</td>
<td>• No change is therefore proposed.</td>
</tr>
<tr>
<td></td>
<td>Allotment Survey (Lambert Smith Hampton)</td>
<td>• More accurate survey undertaken of allotment titles</td>
<td>• Figure 3.4 can be updated to distinguish between 'Registered Land' and 'Unregistered Land' (based on plan prepared 2.7.04)</td>
</tr>
<tr>
<td></td>
<td>East of Eastfield Road Pond: Environmental Sampling (Royal Haskoning)</td>
<td>• A risk assessment of contaminants found in samples was undertaken. This concluded that in relation to proposed residential development adjacent to the pond there is a <strong>negligible to low risk</strong>.</td>
<td>• Glass fragments were found on the pond edge. In our opinion, in view of the low risks posed, the current plan, to include the pond as part of a public open space, is still appropriate. A clean up of the pond can be undertaken and landscape measures introduced to prevent public access to the pond itself. <strong>No change to the plan is therefore proposed</strong>, though the text can be refined to clarify the above.</td>
</tr>
<tr>
<td></td>
<td>Traffic generation and off-site highways impacts (Faber Maunsell on behalf of NCC – to come)</td>
<td>• Clarification and feedback is awaited further to the initial comments prepared 7.4.05</td>
<td>• In-principle, although preliminary results have shown that the existing highways network is able to accommodate traffic generated from the development if discharging solely from Eastfield Road, we propose that to enhance permeability and to make traffic ingress-egress more diffuse, an adopted vehicular route is retained in the plan onto Finedon Road.</td>
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Purpose of Report
To enable Members to consider and approve a response to the Northamptonshire Sub Regional Economic Strategy (SRES) Draft for Consultation.

Background
2.1 The County has worked in partnership since 1997 to produce a Joint Economic Strategy to enable closer collaboration and prioritisation of issues between agencies. In 2002 the Northamptonshire Partnership was formed to help coordinate public investment and direction for economic development in the County.

2.2 An interim Economic Strategy for the County was developed and an annual Prospectus produced to guide the public funding for Northamptonshire which is channelled through the partnership via emda.

2.3 It is an opportune time to review the SRES as the County is currently planning for enhanced growth through the Milton Keynes South Midlands Strategy and the Regional Economic Strategy (RES) is being reviewed by emda. The intention is that the SRES can help to influence the economic agenda at the regional level and also take account of the planned housing and infrastructure which will be delivered through MKSM along with a significant growth in jobs.

2.4 The SRES will act as a point of reference for all in Northamptonshire, setting out a common, shared vision, to which all partners can contribute towards the same result – driving up competitiveness and creating a stronger more dynamic economic base which generates higher incomes and better quality of life.

Discussion
3.1 The Northamptonshire Partnership commissioned consultants EDAW to draft a strategy which has been developed under the guidance of a broad steering group of stakeholders. Consultation with key stakeholders and several workshop events has also been undertaken to develop the strategy to this stage.

3.2 Following consultation, which ends on 16th July, the Strategy will be amended in relation to the comments and responses submitted and will be published as a
final strategy. The Consultation draft has been placed on the Council’s website and stakeholder partners within the Wellingborough Partnership have been notified and asked to provide comments so that a joint response can also be develop and submitted on behalf of the Partnership.

3.3 The draft response is attached as an Appendix to this report for the Committee to consider and approve.

4 Legal Powers
Local Government Act 2003

5 Financial Implications
There are no direct financial implications as a result of this report.

6 Risk Analysis
6.1 Implications for Staffing
(a) The Northamptonshire Sub Regional Economic Strategy will set the economic agenda for the County for the next 10 years, through to 2015, and will guide investment decisions within relation to economic development. It will therefore influence the work programme of the Council’s Economic Development Service and other services which may be affected by investment, regeneration or development decisions.

6.2 Implications for Sustainable Development
(a) The Strategy should enable for the sustainable economic growth of the County responding to the challenges and opportunities imposed on the County through the Sustainable Communities Plan.

6.3 Implications for Equal Opportunities
(a) The Strategy will take account of the Equal Opportunities of all groups and communities within the County in access and provision of employment, training and skills development and wealth creation.

6.4 Implications for Community Safety
(a) The Strategy does not directly have an implication for Community Safety although economically vibrant communities and greater wealth generation opportunities will reduce social inequalities and diminish issues in relation to Community Safety. Objective 3 seeks to focus on these issue.

6.5 Implications for Health Improvement
(a) Similarly there is no direct implication for health improvements as a result of this strategy, however, it will form part of the framework of guidance within which the county will grow and health facilities will be accommodated within this housing and employment growth. Greater generation of wealth will also improve individual’s health and life choices.

6.6 Implications for Property
(a) Property implications will include the potential of increased rental values
across the County and land values as demand increases due to growth proposals. This will have a beneficial impact on the Council’s property portfolio and it will also enable further funding bids for employment land and premises which are currently unmarketable due to constraints.

7 Recommendations

7.1 That Members approve the Council’s response to the Northamptonshire Sub Regional Economic Strategy, with any amendments.

8 Author and Contact Office

8.1 James Wilson, Economic Development Manager

9 Consultees

Corporate Directors
R. Wilton, Head of Financial Services
T. McArdle, Chief Executive
R. Pulling, Head of Spatial Planning
Introduction:

The Borough Council of Wellingborough is grateful to Northamptonshire Partnership and the SRES Steering Group for the opportunity to respond and provide comments on the Draft Sub-Regional Economic Strategy.

The Council broadly supports the themes and issues within the document and hopes that with amendment this Strategy can become a key point of reference for all of Northamptonshire’s stakeholders across the public, private, voluntary and community sectors to help guide their own business strategies and investment. The Council has made a number of comments below which are provided in a constructive manner for the consultants and the SRES steering group to take account of and to enhance the document. The Council’s response is set out as follows:

1) General Comments
2) Section 2 – the Vision
3) Section 3 – Northamptonshire’s Economic Priorities – Objective 1
4) Section 3 – Northamptonshire’s Economic Priorities – Objective 2
5) Section 3 – Support Community Cohesion – Objective 3
6) Section 3 – Effective Partnership – Objective 4
7) Section 3 – A Strong Northamptonshire Brand – Objective 5
8) Section 4 - Implementation

1. General Comments

1.1 The document is relatively long and is not particularly accessible for non-economic development practitioners. The Council would recommend that a 4-6 page Executive Summary or sister document be developed to enable dissemination to a wider audience. For those who require further detail this would be accessible and referenced through the main document if required.

1.2 There seems to be no guidance on how the Northamptonshire Partnership’s annual Prospectus will be aligned to the priorities within the SRES and their relationship in terms of prioritising investment opportunities and project delivery (assuming the Prospectus process is to continue). This should probably be outlined in the strategy to explain how public sector investment and resources will be directed – its not just the NP funding that should be addressed but all forms of external funding and mainstream budgets which can hopefully be redirected to address multi-agency challenges.
1.3 Further explanation of the relationship between the SRES and other more detailed strategies covering specific areas such as education and skills could be made. Listing existing/relevant strategies within Objective priorities is insufficient. The suggestion that an annual Action Plan be developed by lead agencies for each priority area might not be necessary as requirements for this might already be in place through other strategies. It might also prove to be overly onerous for certain lead agencies depending on their resources and other statutory requirements.

1.4 The Council questions whether sufficient emphasis has been given to infrastructure development within the plan? With the removal of the Climate for Investment theme there is now no specific objective which is linked to infrastructure investment decisions. In previous years this would largely have been provided by the private sector through individual developments, however, increasing co-ordination between the Investment Development Programmes of WNDC and NNT will be required to ensure that capacity issues for utilities, roads, rail, environmental assets etc are addressed from a co-ordinated public sector perspective.

1.5 The document lacks a clear delivery mechanism for addressing the priorities it identifies. The possible actions which accompany each priority do not provide sufficient clarity to help prioritise the prospectus or public sector investment.

2. Section 2 – The Vision

2.1 The Council supports the Vision for the SRES in that it is ambitious and focuses attention on the need for an increase in the competitive position of the County. However, the headline indicator to achieve GVA per head in Northamptonshire which is 10 percentage points above the national UK rate does not attempt to measure the Vision’s ambitions to be one of the most successful sub regions in Europe, nor does it state how successful/competitive it might be. If the RES is measuring how success the region is in comparison to other parts of Europe perhaps the County only need concern itself with its competitive position within the UK.

2.2 Objectives and Priorities – The Council broadly supports the five objectives which have been developed. It is recognised that these were derived from extensive stakeholder consultation and workshops, however, there is now no specific focus on physical infrastructure as stated previously. As this will be a very significant component in the growth of the County in helping deliver new communities as part of MKSM it is feared that the prominence of this investment and planning activity will be lost. Both the West Northamptonshire DC and North Northamptonshire Together are developing extensive public/private...
investment programmes which should be built upon in terms of the economic priorities for the County. Investment in roads, rail, health and education facilities, utilities etc will have a profound effect on the economic potential of the County.

3. Section 3 – Northamptonshire’s Economic Priorities – Objective 1

3.1 Target and Growth Sectors for Northamptonshire – There are other high value niche sectors within the County which could be a source of expansion and investment and would value support. The Chemical industry for example, specifically its R&D, should be included within the Niche Markets or Watching Brief sections of this table.

3.2 General Comments – This section does not adequately exploit the innovation centre network within the county and develop the potential for specialist support for high growth business which could be developed in them. There is no mention of the Technology Realm concept which is emerging from Invest Northamptonshire and could have a significant impact in this area.

3.3 Priority 1.2 – Further use could and should be made of the emerging Innovation and Business Centre Network which is developing within the County. Centres now exist in Wellingborough, Kettering, Silverstone and others are being planning in Northampton, East Northamptonshire and Corby. What is lacking is a coherent business and enterprise support package which can help deliver the possible actions suggested with this priority around increasing knowledge transfer and supporting research for spin out activity.

3.4 Priority 1.3 – Further reference to other ‘hard’ infrastructure should be made. While it will not be the responsibility of the SRES to deliver this infrastructure it needs to highlight the WNDC and NNT’s role in wider infrastructure provision if the Northamptonshire economy is to respond to the challenges within the MKSM strategy. Businesses will need to have access to waste facilities, improved roads, better rail freight provision etc as well as high specification accommodation and better public transport access.

3.5 Priority 1.4 – An opportunity to develop additional services aimed at high growth, high quality employment opportunities through the Innovation Centre Network should be developed through this priority. A specific Enterprise and Innovation Strategy/Action Plan should be considered to highlight a range of support and resources that needs to be put in place for small high tech firms to develop.

3.6 Priority 1.5 – As discussed above it would be beneficial to support existing niche or specialist sectors such as the chemical industry.

3.7 Priority 1.6 – The Council supports the need to increase the volume of head office and R&D functions based in the County and would urge
that this needs to be considered in the wider context of an appropriately skilled workforce. It would also suggest that other centres apart from Northampton be targeted for these sectors within the County.

3.8 **Priority 1.7** – The Council supports the focus on improving ICT capacity throughout the County and would encourage the use of the ICT ToolKit developed by emda and NP to plan for ICT capacity within new developments form an early stage. It would also be beneficial if funding could be made available to help provide a limited number of high quality business parks which have the highest specification ICT capacity and connectivity.

3.9 **Priority 1.10** - The Council supports the extension of business award schemes although it would prefer increasing the quality of them over increasing their quantity. Environmental Business Awards are important and their profile should be increased to support the work of CW-IC and resource efficiency clubs within the county. Support of the Young Enterprise awards scheme throughout the county is also important to encourage youngsters to be entrepreneurial and business oriented.

3.10 **Measuring Achievements** – Self evidently the final strategy will have all of the achievement indicators current position, benchmark and target completed. Whether such an extensive list of indicators is required for this section and the whole strategy is something that needs to be assessed with the Northamptonshire Observatory if they are to supply the data for monitoring the indicators. Key headline or composite indicators for each objective should be chosen.

4. **Section 3 – Northamptonshire’s Economic Priorities – Objective 2**

4.1 **General comments** – The creation of a high skilled, dynamic and flexible labour market is key to many of the economic development challenges that the County faces and is something which the county under achieves in. To a large degree the historical pattern of employment – predominately manufacturing and more latterly distribution - has influence both the level of skills within the workforce and the provision of FE and HE education in the County. Significant investment in both is require but the early attraction of new knowledge based industries is also required to sustain the demand for these higher level educational services.

4.2 **Priority 2.2** - The Council supports the development of the Shell STEP programme within the County which is excellently administered and run by KBVT. Further expansion of this programme should be considered. Other graduate management placement schemes for different sectors should also be encourage. The Council is currently fast tracking a graduate from the Employers’ Organisation as part of the National
Graduate Development Programme as part of local government’s attempt to recruit and retain more graduates.

4.3 Priority 2.3 – The Council regards this as a high priority for the county and more companies should be investing greater resources in their workforce’s ongoing development. Unfortunately this is very difficult to achieve on a widespread basis as many companies fail to value the benefits of training until it is too late or feel it is too expensive. The proposed actions for this priority do not identify how this would be achieved and are already being carried out with very limited success.

4.4 Priority 2.6 - The Council supports this priority and would suggest that this could partially be achieved through the support of the Intermediate Labour Market project in construction which is being developed for North Northamptonshire. Targeted Recruitment and Training opportunities through the housing and commercial development in the County will provide a range of opportunities for individuals from disadvantages communities as well as others needing to reskill after downsizing in their current employment sector.

4.5 Priority 2.7 – Enhancing the diversity of the workforce by increasing labour market participation is a necessary activity when labour markets are tight and there is an ageing population. Less young people will be available to fill vacant jobs as in previous generations and other demographic groups will need to be targeted to ensure there is a sufficiently active labour market for the County’s employers. Further and strategies will be needed to make an impact in this area.

4.6 Priority 2.8 – This priority is also key in helping to attract high level occupations, service and knowledge based sectors to the County. It is important to develop the reputation and profile of University College Northampton (UCN) and the attraction of Sunley Management Centre as a resource for local businesses. The Council has recently conducted an internal leadership development programme and significant benefits can accrue if organisations are willing to develop a ‘learning organisation’ culture.

4.7 Priority 2.12 – Raising the aspirations of young people in the County making them aware of vocational and academic routes into careers is essential for Northamptonshire to raise the level of wealth of its citizens and to help retain the brightest young people. To achieve this further focus needs to be placed on the 16-19 year group and how the colleges and schools work together in delivering a more vocational curricula for some pupils. UCN also needs to become a full university of some note to attract Northamptonshire’s ablest students and to bring in students from outside of the County.

4.8 Priority 2.14 – The Council supports this priority (see 4.4 above). Support and funding should be made available to develop a Targeted Recruitment and Training Scheme which is right for the trainees,
encourages the construction industry to take the responsibilities of skills development seriously and will help supply the trained labour to meet the challenges of the MKSM growth agenda.

4.9 **Measuring Achievement** – It would be helpful to know if the indicators for the County were currently rising or falling in relation to GB benchmark over a 3 to 4 year period. It would also be beneficial for some of the indicators to be common for all districts so that monitoring of educational attainment and skills levels could be consistent for LSPs across the County.

5 **Section 3 – Support Community Cohesion – Objective 3**

5.1 **Priority 3.1** – The Council would support this priority, however it would seek to support and enhance the creative partnership working which has developed through Town Centre Management, particularly in Northampton and Wellingborough, before there were considerations of Business Improvement Districts. If this were to be piloted in the County the Council would support targeted assistance in areas where business engagement has been seen to work. The Atkins Town Centre Master Plans undertaken on behalf of emda/NP should also add to relevant strategies/policies.

5.2 **Priority 3.3** - This priority is important to ensure that the majority of the growth that is planned for Northamptonshire, which is to be in new urban extensions, are properly integrated with existing communities. This will help prevent leakage of expenditure to other centres and isolation of new settlements and individuals. Wellingborough Council has had considerable experience in planning for the growth through the WEAST urban expansion and would encourage the sharing of best practice between those authorities and agencies which have had considerable input within these planning processes. New ways of working between public sector agencies will need to be established is sustainable communities are to be created within the County.

5.3 **Priority 3.4** – The Council would endorse this priority also – and has spent a considerable amount of time and money in developing effective planning guidance and consulting with communities. Once again sharing best practice and establishing common design guidance and planning obligations will ensure that the development industry realises that all parts of the county demand the same high quality urban design.

5.4 **Priority 3.8** – Rural regeneration and support for rural businesses is vitally important to sustain life and increase wealth in the County’s villages. Much of the county’s high educated and higher income population is located in rural areas, however, disadvantaged sections of communities existing these areas and greater focus is needed to address these inequities. Community Transport initiatives are once mechanism to improve accessibility, however, greater effort is required
to create truly sustainable on demand services. The County Council and transport operators need to work more closely with local authorities and communities to seek solutions, a certain amount of capital and revenue funding is required to purchase vehicles etc but also to train drivers and pay for insurance and marketing. The rural areas also need to be able to retain jobs and create new jobs therefore appropriate business accommodation is a necessity. Local Plan policies retaining employment uses within villages are helpful as are grants for redundant rural buildings.

6. Section 3 – Effective Partnership – Objective 4

6.1 While the ideal will always be to minimise competition between nearby locations there will inevitably by a competitive tension between the settlements and centres within any area. Part of the work of the LDVs will be to establish the framework within which competition will take place. The County town, Northampton, needs to become a more effective regional centre to counter balance Milton Keynes Peterborough, Rugby and Leicester, while it is as yet unclear what degree of specialisation can occur in the next tier centres of Corby, Daventry, Kettering and Wellingborough. The close proximity of the North Northamptonshire centres needs to be considered in detail as to what function and roles they will have now and in the future.

6.2 Priority 4.1 – Effective cross-border relations need to be considered fully before committing to a particular strategy. Northamptonshire should reflect on what tangible benefits will accrue from a closer relationship with Milton Keynes and other centres and what the deliver mechanism will be to achieve these.

6.3 Priority 4.2 – Northamptonshire has consistently underperformed in recent years in engaging the private sector within the County and in forming a shared agenda which is relevant and accessible to business leaders. The Council therefore supports greater efforts by all public agencies to understand business needs and become more responsive to them. The opportunities that will be available through the MKSM growth will cascade through many sectors of the economy, however, increasing amounts of leakage will occur if the public and private sectors fail to understand the nature of this new investment.

6.4 Priority 4.4 – The Oxford 2 Cambridge Arc concept should be supported and exploited, however, it is difficult to envisage that this will have the impact it should if key elements of the Arc in Oxford and Cambridge are not fully engaged. The concept of the Technology Realm for Northamptonshire needs to be more fully developed and communicated to stakeholders and the relationship between existing Innovation Centres, business parks and future space within the Realm carefully planned.
6.5 **Priority 4.5** – From an external Northampton perspective a clear understanding of the ‘trickle down’ benefits for the rest of the County should be established and how these will be managed and maximised before establishing Northampton as the only viable location to accommodate key elements of infrastructure for the sub-region.

6.6 **Measuring Achievement** – Depending on continued commitment from public sector stakeholder funders the O2C Arc may not be constituted in its current form, therefore it might be inappropriate to use business participation in the Arc as an indicator.

6.7 All of these indicators do not have a current Northamptonshire position or GB benchmark, in fact it would be impossible to have a benchmark for many of them. It is also questioned whether the collation of these indicators will be too difficult and where these targets were developed from given no baseline data?

7. **Section 3 – A Strong Northamptonshire Brand – Objective 5**

7.1 While this is an important issue it is arguable that it needs to be a main objective within the strategy. Other issues such as Environmental Business Performance – (resource efficiency and waste minimisation) – for which Northamptonshire is highly regarded, does not feature at all and would help to sustain the high quality of life that is mentioned in the Strategy as a key asset of the County.

7.2 The difficulty with a diverse area like Northamptonshire which does not have a strong traditional identity is that any brand that is developed for the County as a whole might seemed contrived or does not ring true with those externally viewing the area or people living here. Messages for the ‘offer’ of Northamptonshire do, however, need to be agreed and vigorously promoted. The development of key strategic sites for inward investment and marketing of these through Invest Northamptonshire has still to be agreed. This will have a key input into the core ‘offer’ of what Northamptonshire can deliver for business and provide a focus on the highest quality business sites. Together with site promotion Invest needs to highlight Northamptonshire’s lifestyle opportunities which will help to reinforce the assets that are relevant and appropriate for the housing growth in the County.

7.3 **Priority 5.1** – The Council believes that better integration and co-ordination is required between public agencies to deliver an effective aftercare programme for the existing businesses within the County. Wider development and promotion of marketing collateral is required which is consistent across the numerous public agencies which are promoting various locations or assets of the County.

7.4 **Priority 5.2** – the development and communication of a strong brand strategy for the County, as mentioned above, might not be an effective use of resources. If a set of agreed messages can be compiled and
distributed to stakeholders it would enable consistent statements to be delivered within a loose framework rather than a more tightly defined and controlled branding and promotional campaign which might be expensive and difficult to sell in a diverse area. If marketing of the County is undertaken it should be done on a very limited number of themes such as sports/events (Grand Prix/Rockingham motorspeedway/Balloon Festival/Waendel Walk etc) or excellent accessibility (Northamptonshire is centrally located with excellent road and rail networks & equidistant from 4 major airports).

7.5 Priority 5.3 – The Council would support the principle of this priority and feels that cultural and heritage assets could be built upon within the County to further the economic and promotional needs of the individual areas and towns. Reference to the Castle Theatre and cultural quarter which is developing around this with the proposed opening of the Wellingborough Heritage Centre in 2007 should be made. The activities of Retail Crime Reduction Partnership should be mentioned in relation to improving public realm and enhancing Town’s retail, leisure and cultural facilities.

7.6 Priority 5.4 – The improvement of the County as a visitor destination is encouraged although its limitations in acting as a major tourism destination need to be accepted in relation to major attractions within the County. More needs to be made out of existing venues such as Silverstone and a more aggressive approach to business/conference tourism needs to be made.

7.7 Priority 5.5 – Reference should be made to cultural development within North Northamptonshire within one or all of the 3 major centres dependent on any emerging specialisation which might occur.

7.8 Priority 5.6 – It is unclear as to what this priority would achieve or the actions that are proposed. Enhancing physical access to East Midlands and Birmingham Airport are not within the powers of Northamptonshire authorities. Increasing advertising and promotion of the County at key international transport hubs – especially St Pancras/Kings Cross would be desirable and supported.

8. Section 4 - Implementation

8.1 Under Roles and Responsibilities mention should be made of working in partnership with the private sector and the development community. Ultimately most of the objectives set out in the strategy will not be achieve without the involvement of these groups.

8.2 The SRES priorities must provide the framework and guidance for the Investment Development Plans for the West Northamptonshire Development Company and north Northamptonshire Together where
these relate to employment, job creation, skills development and education and infrastructure.

8.2.1 Implementing the SRES – The diagram on p53 is incomplete and does not adequately show the merger of current groups within the County around these issues which will need to be made to effectively deliver and monitor the SRES. Further work is required to show where this duplication currently exists, as the likelihood is that with an ever growing list of agencies and groups the picture will become even more crowded and confused. There also need to be effective liaison and communication with the Local Strategic Partnerships and an ability to ‘localise’ elements of the strategy to deliver through partners on the ground.

8.3 Role of the Lead Body – As previously stated, it is considered that the development of action plans for each priority area will be too onerous and may be duplicating action plans, which are already being delivered through sub strategies to the SRES. Links with other strategies need to be made more explicit and it is suggested that action plans could perhaps be limited to each objective. Further clarification is also sought on how the ‘action planning’ process relates to Northamptonshire Partnership’s annual prospectus and business plan development processes.

8.4 Working with the MKSM Delivery Vehicles – It is not clear from the diagram on p54 how the reporting structures to the various partnerships would work and what the relationship between them would be. A concern would be that the SRES becomes independent of the business and investment planning of the two local delivery vehicles.

8.5 A ‘living’ strategy - Reference is made for the need to monitor and review SRES implementation and it is suggested that this should be formally reviewed in line with RES review every 3 years. An annual monitoring review should be undertaken in line with the production of the Prospectus if this is to be maintained to inform public sector investment and funding priorities and the review successes and trends. This could be published and fed back as part of the Northamptonshire Partnership’s AGM.