

The Plan for the Borough of Wellingborough: Regulation 18 Consultation: Representations and Draft Officer Response

Rep No.	ID	Full Name	Organisation Details	Agent	Number	Representation	Draft Officer Response
1	6	Mr Kenneth Bernthal			Question 1	It would appear to cover the major points, but perhaps the details need to be restated	Noted. The detail will follow in later stages.
2	16	Rose Freeman	Planning Policy Officer The Theatres Trust		Question 1	<p>We support a section for policies to manage the future of Wellingborough town centre to reflect item 23 on page 7 of the National Planning Policy Framework which states that a range of suitable sites should be allocated to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.</p> <p>We note in the document <i>A Cultural Investment Plan for North Northamptonshire Feb 2010</i> that the Castle Arts Centre and Wellingborough Museum will be the focus of a strong cultural quarter for Wellingborough and we would expect to see details of this scheme in the Plan.</p> <p>Although a healthy retail offer is important, there is a growing recognition that the rounded experience of a town including its cultural offer and added attractions are, and will increasingly be, essential to attracting trade as well as talent and tourism.</p>	Noted. These aspects will be taken forward during the preparation of the plan.
3	40	WCS	Wellingborough Civic Society		Question 1	All items in the list 'Anticipated Content of the Plan' are supported - no item should be removed	Noted.
4	19	Mr Stephen Borrett	Vice Chair Wilby Parish Council		Question 1	We believe so in as far as there is impact upon our village location.	Noted.
5	22	Mrs S Spencer	National Federation of Gypsy Liaison Groups		Question 1	In view of the publication of "Planning Policy for Traveller Sites" a new policy is needed to show how the Council intends to address the needs of Gypsies and Travellers. A policy should be included in the Plan	These aspects will be taken forward during the preparation of the plan and will be subject to greater detail as the review progresses. The topic will also be covered in the JCS.
6	31	Mr Colin Staves	Principal Spatial Planner West Northamptonshir e Joint Planning Unit		Question 1	The anticipated content of the plan appears to be appropriate, however some more detail on some of the issues would be helpful. For example, will the site specific policies to deliver the housing need identified in the North Northamptonshire Joint Core Strategy include accommodation for Travellers?	Travellers accommodation will need to be addressed alongside other forms of housing.
7	46	Mrs SUSAN SUTTLE			Question 1	I welcome the re-valuation of the local plan, which broadly covers the main points, but they require more detail, not only relating to villages without a Neighbourhood Plan, but all settlement areas where further planning applications are yet to be submitted and which have not significantly featured in previous local plans, including the recent Sites	More detail will be provided as the plan progresses. The review will include a review of the Site Specific Proposals Document.

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						Specific Plan Document.	
8	48	Natural England	Consultation Service Natural England		Question 1	<p>Upper Nene Valley Gravel Pits</p> <p>The Upper Nene Valley Gravel Pits is a nationally and internationally important site for its breeding bird assemblage of lowland open waters and their margins (including the largest nesting colony of grey herons in Northamptonshire), wintering waterbird species, an assemblage of over 20,000 waterbirds in the non-breeding season, and a rare example of wet floodplain woodland. It is designated as Special Protection Area (SPA), a Ramsar and a Site of Special Scientific Interest (SSSI).</p> <p>We note that in section 7 of the Plan report that it is acknowledged that as the competent authority Wellingborough Borough Council will need to carry out a screening assessment under the Conservation of Habitats & Species Regulations 2010 (the Habitat Regulations) to assess the impact of any proposed development within the Wellingborough Plan on both the Upper Nene Valley Gravel Pits and any other Natura 2000 sites that could potentially be affected. Natural England will be happy to provide advice on the HRA as the plan progresses.</p>	The advice offered is welcomed and the Council is keen to work with Natural England to ensure the screening assessment is carried out correctly.
9	55	Bovis & SCLG	Bovis Homes Ltd & Stanton Cross Land Owners Group	Define	Question 1	<p>I write on behalf of my clients Bovis Homes and the Stanton Cross Landowner's Group (SCLG) regarding the consultation you are undertaking in relation to The Plan for the Borough of Wellingborough ("The Plan"). As you are aware my clients are the developer and landowners associated with the consented Stanton Cross scheme to the east of Wellingborough. They also control a large extent of land beyond the consented site, with considerable potential for further strategic development.</p> <p>My clients welcome the initiative of the Borough Council to prepare a new Local Plan for the Borough. They have previously made representations in relation to the preparation of the Site Specific Proposals Development Plan Document, and it is still important to progress key elements of that to ensure the sustainable growth of the town and Borough. Furthermore, they support the replacement the Town Centre Area Action Plan and historic adopted Local Plan policies. These documents are now somewhat out of date, particularly in light of the publication of the National Planning Policy Framework (NPPF), and the on-going review of the North Northamptonshire Joint Core Strategy (NNJCS). There is a clear logic to bringing these various elements together in a single Local Plan Documents that sits underneath the NNJCS.</p> <p>It is understood that the Borough Council's intent is for the new Local Plan to add local detail to the strategic policies contained in the NNJCS. However, it is not yet clear how this will work in practice. It is agreed that it would be inappropriate and unnecessary to repeat policies contained in the NPPF or the NNJCS. It is also agreed that the new Local Plan should not be so detailed that in practical terms takes too</p>	<p>Noted.</p> <p>Noted and welcomed.</p> <p>Noted and welcomed.</p>

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						<p>long to produce. Therefore, in terms of Consultation Question 1, the proposed scope of The Plan as set out of page 6 is generally agreed.</p> <p>It is, however, critical that the policies within The Plan help to facilitate the development required in the Borough as identified in the NNJCS. You will be aware that we have previously made representations to the NNJCS review process that have given support to the proposed development strategy to concentrate development at the identified Growth Towns (including Wellingborough), the focus on the delivery of the development requirements through the creation of strategic urban extensions, and the explicit support for the consented Stanton Cross development in the NNJCS. However, those representations have also highlighted concerns in respect of the overall level of development, its distribution between the constituent local authorities, and the failure to facilitate the full and logical development of Stanton Cross through the allocation of land to the east of the already consented site for residential development.</p> <p>What is not clear is whether The Plan will include site specific policies relating to the strategic sites that will be allocated in the NNJCS, or indeed those that already have the benefit of a planning permission (as was proposed in the Site Specific Proposals Development Plan Document). If that is the case, it is important that The Plan does not seek to reinvent what has already been approved, or reopen matters that have already been addressed in the NNJCS or development management process.</p> <p>In terms of other development proposals, The Plan needs to set out policies that will guide emerging proposals and bring them forward, but not be so detailed that it seeks to dictate matters that should properly addressed through the development management process.</p> <p>For example, in terms of public open space provision (one of the specific matters highlighted in the proposed scope of The Plan), it is not necessarily helpful to seek to apply blanket requirements for a variety of very specific types of open space to each and every site. Instead guidance is required that encourages proposals to respond to both the strategic context and existing (or proposed) provision, and the specific nature of the site. The provision multi-functional spaces that respond to a variety of needs should be encouraged. With this objective in mind, it seems that the existing evidence base in respect of this matter will need to be refreshed Consultation Question 4).</p> <p>Furthermore, it will also be absolutely critical that The Plan (in association with the NNJCS) ensures that all future developments make a fair contribution to strategic and local infrastructure requirements. This will ensure that the required infrastructure provision in the town and Borough does not unduly burden the proposed strategic developments alone. The Plan will need to set out the expectations in this regard, and the mechanism(s) for securing the required contributions.</p>	<p>Noted. As the NNJCS will be part of the Local Plan for Wellingborough; any review will need to be complementary to its policies. The overall level of development and its distribution between authorities will be determined through the JCS.</p> <p>Noted. The plan will not seek to alter existing planning permissions.</p> <p>Noted and agreed.</p> <p>Part of the review of the Local Plan will include reviewing the evidence base for Open Space.</p> <p>This issue is more likely to be addressed through CiL and the associated SPD on S106 agreements. However, an Infrastructure Delivery Plan will also be required. As a result, this issue will receive further consideration in later stages of the plan review process.</p>

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10	58	Geoff Taylor	Cyclists Touring Club		Question 1	Yes, but see additional comments.	Noted.
11	65	Geoff Taylor			Question 1	Yes but see additional comments	Noted.
12	77	Matthew Stock	Redrow Homes	Senior Planner Pegasus Planning Group	Question 1	<p>Redrow Homes believe that the general scope of the Local Plan, as set out in the consultation report, is appropriate to provide for a spatial interpretation of the strategic policies defined within the North Northamptonshire Joint Core Strategy. It is noted that the Plan is at a very early stage in its preparation and Redrow look forward to commenting on the detail of the policies as the development progresses.</p> <p>In relation to the objectives of the Plan (Q1), Redrow would highlight that Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan and should not be used to prevent development. Neighbourhood Plans should also be seeking to add local expression of policies, rather than alter strategic matters. Redrow are concerned that the current plan objectives appear to allow communities progressing Neighbourhood Plans to pre-determine the planning strategy for the district. It is therefore requested that allocations are made in the Local Plan that meet the full, objectively assessed needs and that the allocation of suitable sites, in sustainable settlements and locations, is not prohibited due to the preparation of a Neighbourhood Plan whose purpose is to impede necessary development.</p>	<p>Noted and welcomed.</p> <p>As confirmed by the NPPG, it is possible and wholly appropriate for a neighbourhood plan to come forward in advance of an up-to-date local plan. The key is to ensure that the approach taken by both the qualifying body and the Local Planning Authority in managing growth in the neighbourhood area are consistent. To do this and to avoid conflict between the eventual neighbourhood plan and the strategic policies of the local plan (under Section 38(5) or the PCPA 2004) it is important that both bodies work collaboratively to identify a proportionate evidence base and objectives for the plan to ensure it is in line with national policy requirements. This will ensure that the Borough adequately meets its own growth targets and will give the plan the best chance of passing the examination. Additionally, this approach will ensure that the neighbourhood plan's strategy enjoys sufficient longevity by avoiding conflict with the emerging local plan. BCW's stance on the importance of this approach is clear and has been demonstrated through our support of neighbourhood planning in the borough to date.</p>
13	81	Unknown Unknown	Bletsoe Brown and Sywell Aerodrome Ltd	Partner Marrons	Question 1	In so far as the Plan for the Borough of Wellingborough ('PBW') is intended to sit alongside the North Northamptonshire Joint Core Strategy, the anticipated content of the plan in general terms covers the	Noted and welcomed.

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				Shakespeare		<p>areas that will require to be considered in seeking to bring forward site specific policies to deliver (in particular) the housing, employment and retail needs during the proposed Plan period.</p> <p>In addition, and as acknowledged in the consultation paper, it is important that there are policies in place to deal effectively with development pressures and opportunities. One such opportunity that our clients would like to draw to the attention of the Council, and address with you through the plan process, the economic, environmental and social benefits that could be delivered through the sustainable growth of Sywell Aerodrome.</p> <p>As one of the major employment locations within the Borough, the Aerodrome already makes a significant contribution to meeting the economic and social needs of the area. Its existing infrastructure and critical mass of businesses means the Aerodrome is well placed to make a significant and sustainable contribution to meeting the long term future needs of the Borough. Furthermore, its location in close proximity to the future sustainable growth of West Northamptonshire, means it also has an important role in contributing towards the needs of the adjoining West Northamptonshire area. The consideration of this issue within the Plan will therefore ensure the requirements under the duty to cooperate are appropriately addressed by all authorities.</p>	Noted. This issue will be taken forward during the preparation of the plan
14	91	Katie Clark	Planning Liaison Manager Anglian Water, Growth Planning and Equivalence Team		Question 1	I acknowledge that there is general guidance within the core strategy policies regarding flood risk. However I believe it is key to re-iterate these policies and include them with specific detail to sites within The Plan. Please find my high level comments below (attached) and I will be happy to review the draft document once it has been developed in order to provide specific comments.	Further discussion on this issue is welcomed. Revised flood risk areas can be entered onto the Proposals Map at a later stage.
15	92	The Chair	Wellingborough Inter Faith Group		Question 1	I have looked at the Plan and have no particular comment to make, Unfortunately we did not have time at our meeting in April to discuss it but I cannot see anything which members would object to. It should improve that area of the town which has to be a good thing for the community.	Noted. There will be other opportunities to comment further as the review progresses.
16	94		Hampton Brook Ltd	Senior Planner DLP Planning Consultants	Question 1	<p>Paragraph 7.1 of the consultation paper states that the Wellingborough Plan will identify smaller sites also needed to deliver the level of housing identified in the North Northants Joint Core Strategy (NNJCS). The Core Strategy review is currently stalled pending the Secretary of State decision on the Rushden Lakes appeal.</p> <p>Given that the Council is currently unable to demonstrate a 5 year supply of housing land in accordance with paragraph 47 of the Framework, identifying a range of specific, deliverable housing sites will</p>	Noted. Agreed.

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						<p>be a crucial component of the emerging Plan.</p> <p>The shortfall in housing supply is likely to be greater than anticipated in the Interim Housing Statement (IHS) following a recent appeal decision at Broughton (Kettering Borough) (PINS Ref: APP/L2820/A/13/2204628) which advocates the Sedgefield method of distributing the Council's shortfall of 764 dwellings (2011-2013) (i.e. in the next 5 year period) as opposed to the Liverpool method (over the whole plan period) employed in the IHS. Indeed paragraph 35 (Reference ID: 3-035-20140306) of the National Planning Practice Guidance (NPPG) states that:</p> <p><i>" Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'"</i></p> <p>The provision of suitable and sufficient employment sites will also be important to ensure economic growth for the Borough of Wellingborough and so as to attract inward investment, provide sufficient local jobs and training opportunities and reduce out commuting.</p> <p>The Plan should be positively prepared in accordance with the requirements of the NPPF and the scope and content should therefore reflect this.</p>	<p>An up-to-date reassessment of the 5 year supply is being undertaken in accordance with the IHS this shows that the Council can demonstrate a 5 year supply using the Sedgefield method. The Wellingborough Plan will make an assessment against the JCS.</p> <p>The Council is undertaking an Employment Land Review; employment issues will be taken forward during the preparation of the plan</p> <p>Agreed.</p>
17	101	Ms Tracy Hogdkins	Barratt Northampton	Senior Planner DLP Planning Consultants	Question 1	<p>Paragraph 7.1 of the consultation paper states that the Wellingborough Plan will identify smaller sites also needed to deliver the level of housing identified in the North Northants Joint Core Strategy (NNJCS).</p> <p>Given that the Council is currently unable to demonstrate a 5 year supply of housing land in accordance with paragraph 47 of the Framework, identifying a range of specific, deliverable housing sites will be a crucial component of the emerging Plan.</p> <p>The shortfall in housing supply is likely to be greater than anticipated in the Draft Interim Housing Statement (IHS) following a recent appeal decision at Broughton (Kettering Borough) (PINS Ref: APP/L2820/A/13/2204628) which advocates the Sedgefield method of distributing the Council's shortfall of 764 dwellings (2011-2013) (i.e. in the next 5 year period) as opposed to the Liverpool method (over the whole plan period) employed in the IHS. Indeed paragraph 35 (Reference ID: 3-035-20140306) of the National Planning Practice Guidance (NPPG) states that:</p> <p><i>" Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'"</i></p>	<p>See response above.</p>
18	110	Trustee Ecton Estate	Trustee	Graduate Planner	Question 1	<p>In so far as the Plan for the Borough of Wellingborough ('PBW') is intended to sit alongside the North Northamptonshire Joint Core</p>	<p>Noted.</p>

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			Ecton Estate	Fisher German LLP		Strategy the proposed content of the plan in general terms covers the areas that will need to be considered in seeking to bring forward site specific policies to deliver housing, employment and retail needs during the proposed Plan period.	
19	116	Councillor Brian Skittrall	Bozeat Parish Council		Question 1	In general.	Noted.
20	130	Mr Paul Lewin	Planning Policy and Heritage Manager Northampton Borough Council		Question 1	The consultation rightly identifies the tension between time taken to write a plan that deals with local issues that might neither be adequately covered by the North Northamptonshire Joint Core Strategy and the NPPF. It is appreciated that the document is very much at an early stage of development. Given where the Plan is in terms of its preparation, it is understandable that little detail is provided at this stage on exact content. Northampton Borough outlines the issues that it considers should be covered more fully in relation to question 2. These are more strategic in their nature and it is recognised that there is a process that will have to be gone through in relation to both the North Northamptonshire Joint Core Strategy and the Wellingborough Local Plan before for instance allocations are identified which might relate to Northampton's longer term housing and employment needs. Nevertheless, in relation to potential allocations related to Northampton, when considering other issues that have been specifically identified in the consultation such as setting new standards in relation to open space, Northampton Borough feels that there would be merit in relative compatibility with standards / priorities for infrastructure between the differing local authorities. This is will be particularly of relevance if allocations which are essentially contiguous cross local authority boundaries.	Noted. Further discussion on this issue, particularly on the details is welcomed.
21	124	Mrs Carol Mundy	Clerk to Great Doddington Parish Council Great Doddington Parish Council		Question 1	It is difficult to judge. Any response would be directly as it effects Gt. Doddington.	Noted.
22	133	Mrs Linda Ross	Clerk to Mears Ashby Parish Council Mears Ashby Parish Council		Question 1	No!	Noted.
23	5	Mr Paul Tame	Regional Environment and Land User Adviser National		Question 2	Thank you for consulting the NFU on this matter. The NFU has 4,800 farmer members out of the 6,000 farmers in the East Midlands region who farm more than 50 hectares of land. Two thirds of the land within the Borough of Wellingborough is farmed. The viability and success of farmers in the area is crucial to the local economy and the environment.	Farm diversification has improved more recently as a result of the prior approval system. Development Management policies dealing with these issues will be in the JCS.

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			Farmers Union			<p>Farmers need local plan policies which enable:-</p> <ul style="list-style-type: none"> - New farm buildings needed by the business. This could be for regulatory reasons (e.g. new slurry stores) or because new or more crops and livestock are being farmed (grain stores, barns, livestock housing etc). - Farm and rural diversification. Some farmers will be in a good position to diversify into equine businesses, on farm leisure and tourism and in other sectors which will help boost the local economy and support the farm business. - On farm renewable energy. Farms can be ideal places for wind turbines, pv, solar, anaerobic digestion, biomass and biofuels plant provided they do not cause nuisance to others. The UK must meet a target of 15% renewables by 2020. Currently we are languishing in last place of EU member states at 5% of energy needs met by renewables. On farm renewables can help us to meet this EU target and avoid infraction penalties. - Conversion of vernacular buildings on farms into new business use or, if that cannot be identified, residential use. This enables parts of older buildings to be preserved whilst helping the economy and the farm business. - New housing should not be built close to existing noisy or smelly farm buildings which are effectively bad neighbour uses, to prevent nuisance to new homeowners and abatement notices being served on existing farm businesses which could close them down. <p>The NFU will be looking to see that the new local plan has policies which positively encourage the above and do not deter them because of, for example, restrictive landscape designations and sustainable transport policies which imply that all development needs to be by a bus stop. I look forward to commenting on more detailed draft policies in the local plan process.</p>	
24	7	Mr Kenneth Bernthal			Question 2	The regeneration of the market area is paramount	Noted. This issue, together with retail issues will be taken forward during the preparation of the plan.
25	17	Rose Freeman	Planning Policy Officer The Theatres Trust		Question 2	<p>The National Planning Policy Framework provides guidance on the types of issues that should be addressed in Local Plans. Our main concern is that your cultural facilities are acknowledged and a policy is provided that will protect and enhance your social, community and cultural facilities. We do not see the provision and maintenance of community facilities in the Anticipated Content list, yet there are two bullet points for open space matters.</p> <p>Local facilities, whether publicly or privately owned, can be subject to development pressures from alternative uses. It is therefore important</p>	These aspects will be taken forward during the preparation of the plan.

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						that where appropriate facilities are retained within the local community there is a policy to both protect existing facilities from development pressures and to provide new or enhanced social, community and cultural facilities wherever possible. The provision of such facilities should meet local needs and thus reduce the need to travel further afield.	
26	23	Mrs S Spencer	National Federation of Gypsy Liaison Groups		Question 2	A new policy on Gypsy and Traveller site provision	This issue will be taken forward during the preparation of the plan. The topic will also be covered by the JCS.
27	41	WCS	Wellingborough Civic Society		Question 2	<ol style="list-style-type: none"> 1. Transport - rural bus service accessibility 2. Sustainability - energy saving/sustainable building/water conservation 3. Town centre - role of Wellingborough Market Square/heritage shop fronts/free parking 4. Heritage - local references in new buildings/tree lined avenues/maintain agreed Conservation Area 5. Human scale - avoiding brutalist architecture with large flat feaureless surfaces 	<ol style="list-style-type: none"> 1. Whilst the Plan for the Borough of Wellingborough would seek to encourage sustainable transport choices, it would have no direct influence on bus provision, their funding or route options. Transportation issues in general are considered at County level and the details are contained within the Northamptonshire Transportation Plan 2012. 2. This issue will be considered against the emerging policies of the JCS and during Issues and Options stages of the plan. 3. The role of the Market Square will be considered at Issues and Options stage. It is not anticipated that this current review will revisit the issue of free parking; this is likely to remain the same as the existing situation. 4. The Council has an existing Shop Front and Advertising Design Guide. 5. This relates to design in general and will be considered against the emerging policies of the JCS as it is reviewed and if necessary at Issues and Options Stage
28	29	Ginny Hall	Mobile Operators Association		Question 2	<p>Thank you for your recent consultation on the above. We have considered the proposal relevant to the Mobile Operators Association and would offer the following comment on their behalf. We would take this opportunity to comment that we consider it important that there is a specific telecommunications policy within the emerging Local Plan.</p> <p>It is recognised that telecommunications play a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues</p>	These aspects will be taken forward during the preparation of the plan.

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						<p>surrounding telecommunications development.</p> <p>The National Planning Policy Framework (NPPF) at paragraph 42 confirms that;</p> <p><i>"advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services."</i></p> <p>Paragraph 43 of NPPF confirms that;</p> <p><i>"in preparing local plans, local planning authorities should support the expansion of telecommunications networks",</i></p> <p>but should also;</p> <p><i>"aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."</i></p> <p>As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF.</p> <p>On this basis we would suggest that a concise and flexible telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against.</p> <p>We would suggest a policy which reads;</p> <p><i>" Proposals for telecommunications development will be permitted provided that the following criteria are met: -</i></p> <p><i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i></p> <p><i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i></p> <p><i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i></p> <p><i>(iv) If proposing development in a sensitive area, the development</i></p>	

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						<p><i>should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</i></p> <p><i>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</i></p> <p>We would consider it appropriate to introduce the policy and we would suggest the following;</p> <p><i>"Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings."</i></p> <p>We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.</p>	
29	32	Mr Colin Staves	Principal Spatial Planner West Northamptonshire Joint Planning Unit		Question 2	<p>The need to consider and address cross-boundary issues, particularly in relation to the growth of Northampton, should be recognised in the scope of the Plan. In order to accommodate Northampton's housing and employment needs up to 2029 the West Northamptonshire Joint Core Strategy has allocated strategic sites which adjoin Northampton but are beyond the Borough boundary. It is likely that further development will need to be accommodated beyond the Borough boundary post 2029. It is important that both the emerging North Northamptonshire Joint Core Strategy and the Plan for Wellingborough take account of the potential need to accommodate Northampton's housing and employment needs. Consequently, in identifying future directions of growth in the Borough of Wellingborough consideration should also be given to potential sites to meet Northampton's needs post 2029, including through the Sustainability Appraisal process. This work will need to be undertaken with the close involvement of West Northamptonshire Joint Planning Unit and Northampton Borough Council.</p>	This issue will require further detailed discussion and consideration throughout the review process.
30	35	Mark White	Historic Environment Planning Advisor English Heritage		Question 2	<p>The Plan for the Borough of Wellingborough represents an important part of Wellingborough Local Plan and has implications for the conservation and management of the borough's historic environment. There is an opportunity at this early stage of production to draft policies that benefit the borough's heritage assets which include 520 listed buildings, 11 scheduled monuments, 1 registered park and garden and 12 conservation areas.</p> <p>We note that at 7.1 it is stated that the plan will sit alongside the North</p>	These points will be taken forward for consideration at later stages in the plan making process and further discussions on these aspects would be welcomed.

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						<p>Northamptonshire Joint Core Strategy which will set out the strategic policies for the area including the historic environment and as such, the Wellingborough Plan will therefore not need to include policies on these matters.</p> <p>We do not agree that the Wellingborough Plan does not need to include policies on the historic environment given the heritage assets present in the borough.</p> <p>We are aware that the Wellingborough Plan will sit alongside the forthcoming North Northamptonshire Joint Core Strategy, on which we will provide comment. We are also aware that the new Core Strategy will include policies on the historic environment, which we welcome. We are also aware that the Wellingborough Plan will sit alongside emerging and future Neighbourhood Plans and existing and emerging Supplementary Planning Documents, including the Local List of Heritage Assets and Town Centre Guidance. We agree that as stated at 7.2, the plan will need to concentrate on the key issues facing the area. These key issues include the historic environment.</p> <p>We note that the anticipated content of the plan makes three references to Wellingborough town centre; much of Wellingborough town centre is a conservation area and contains a number of listed buildings. We also note that the content of the plan will include village settlement boundaries for those villages not covered by Neighbourhood Plans and identifications of areas of open space for protection in areas not covered by Neighbourhood Plans. Again, many such areas contain significant heritage assets and as such, policies relating to the historic environment of the borough are required.</p> <p>We will wish to see policies within the plan that protect, conserve and enhance the natural, built and historic environment, including key landscapes and both designated and non-designated heritage assets.</p> <p>At the very least we wish to see the policies of the Wellingborough Plan "heritage proofed" to ensure that they take account of the historic environment of the borough.</p> <p>The historic environment should play a critical role in sustainable development at the heart of all spatial planning work, as reflected within the National Planning Policy Framework (NPPF).</p> <p>The NPPF sets out a number of requirements in relation to plan-making and the historic environment. Specifically, the NPPF is clear in that protecting and enhancing the historic environment and seeking positive improvements to it is a key element in the achievement of sustainable development (paragraph 7). Paragraph 17 of this document is also clear that the conservation of heritage assets is also one of the core principles of the NPPF that underpin plan-making.</p> <p>More specifically, paragraph 126 states that local plans should include a clear and positive strategy for the conservation and enjoyment of the</p>	

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						<p>historic environment in the area, including heritage assets most at risk through neglect, decay or other threats. The NPPF also requires local plans to include a strategic policy to conserve and enhance the historic environment of the area (paragraph 156). We would expect a Local Plan to include policies relating to the historic environment at both a strategic level and development management type policies. Site allocations should also take account of the historic environment. Further, detailed advice on this is provided below:</p> <p>Historic Environment Strategy</p> <p>In formulating the strategy it is advisable and often necessary to consider the following factors:</p> <ul style="list-style-type: none"> • How the historic environment can assist the delivery of Vision and the economic, social and environmental objectives for the plan area; • How the plan will address particular issues identified during the development of the evidence base, including heritage at risk, and the reuse of buildings; • The location, design and use of future development and how it can contribute to local identity and distinctiveness; • The interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, town centres and climate change mitigation/adaptation; • The means by which new development in Conservation Areas, and within the setting of heritage assets might enhance or better reveal their significance • How Article 4 Directions may be employed to provide an additional conservation mechanism • How local lists might assist in identifying and managing the conservation of non-designated heritage assets; • How the archaeology of the plan area might be managed; • How CIL and/or S106 funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified within the Infrastructure Delivery Schedule; • Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed; • What implementation partners need to be identified in order to deliver the positive strategy; • What indicators should be used to monitor of the heritage strategy's effectiveness. • In order to deliver an effective strategy for the conservation of the historic environment is there a need for the plan to include development management policies and where appropriate specific policies for specific assets or specific areas within the plan area. <p>A strategic policy should flow from the development of the strategy to enable its delivery. In our experience good strategic policies identify</p>	

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						both general and more locally specific historic environment issues. We are able to provide more advice on this as appropriate and recognise that there will need to be an appropriate relationship between the more strategic historic environment policy in the forthcoming core strategy and the more locally specific policies of the Wellingborough Plan.	
31	38	Mark White	Historic Environment Planning Advisor English Heritage		Question 2	<p>Development Management Policies</p> <p>In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies where these are necessary to enable a decision maker to determine an application. We therefore welcome the statement that the Wellingborough Plan will set a clear context on how planning applications in the borough will be dealt with. Paragraph 154 of the NPPF in particular cites the need to set out clear policies on what will or will not be permitted.</p> <p>As previously stated, there is a requirement for Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment in the NPPF (paragraph 126). We consider that there is a need for development management policies to be incorporated as part of this positive strategy within Wellingborough in order to further clarify how the strategic policies and strategy for the historic environment will be implemented at local level. Themes identified within the evidence base should help you derive locally appropriate policies at this level. In terms of detailed policies for the historic environment areas you may wish to explore are:</p> <p><i>Areas where the NPPF policies are very generalised</i></p> <p>For example, although paragraph 128 requires applicants to describe the significance of heritage assets, you may wish to set out further and more detailed local information requirements for applications involving heritage assets to assist in the speed of decision making. A further example would be policies or policy reference for the protection locally listed buildings.</p> <p><i>Areas where DM policies are necessary to address local circumstances of the plan area.</i></p> <p>For example there may be a number of key issues which require specific policy recognition including (but not limited to):</p> <ul style="list-style-type: none"> ▪ Development in conservation areas - this might be crucial where there are to be a number of allocations within such areas. ▪ Historic shopfronts and advertisements - where there is an abundance of these, it might be critical to include specific policy reference to their protection. ▪ Change of use of specific type of asset where there is much pressure (for example conversion of traditional rural buildings. ▪ Protection of specific historic landscape characteristics - for 	The JCS will include development management policies relating to the historic environment, this plan is likely to concentrate on any site specific heritage issues.

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						<p>example ridge and furrow, ancient woodland etc.</p> <p>In terms of format, there is no one way advocated - some authorities have produced a combined single development management policy, some have produced a small number of policies (i.e. for 'designated heritage assets' and 'non-designated heritage assets') and where there are areas which extensive historic environment attributes, a bigger suite of policies have been produced. Again, in terms of format, this will come from your evidence base as to what would be most appropriate for the protection and enhancement of the historic environment.</p> <p>We would also advise that historic environment considerations should not be limited to a stand-alone chapter - there is likely to be other relevant policies where specific criteria relating to the historic environment is appropriate. For example, this could include policies relating to climate change, landscape, green infrastructure, design etc.</p> <p>We are happy to comment on draft policies as they develop and provide further advice on any of the above.</p> <p>We welcome the opportunity to comment on further iterations of the Wellingborough Plan. Please do not hesitate to contact me if you wish to discuss any of these comments.</p>	
32	47	Mrs SUSAN SUTTLE			Question 2	<p>The Site Specific policies to deliver housing/employment/retail take no account of rural or historical sites which exist around the town. From a historical aspect which could lead to preservation within leisure facilities, The Sites and Monuments records for Wellingborough North have been disregarded, as has encouragement to exploit the rural or green economy of the area. The potential for other employment beyond industry or retail does not seem to be a consideration, despite there always being industrial sites to let at any one time, more are planned or in the pipeline.</p>	These aspects will be taken forward during the preparation of the plan.
33	49	Natural England	Consultation Service Natural England		Question 2	<p>Biodiversity</p> <p>Biodiversity is a core component of sustainable development, underpinning economic development, and has an important role to play in developing locally distinctive and sustainable communities.</p> <p>We advise that any development proposals should aim to avoid damage to existing biodiversity features, particularly statutorily designated sites, and to create opportunities for enhancing biodiversity through the delivery of Local Biodiversity Action Plan (LBAP) targets. Your authority may find the Nature on the Map website useful to source information on conservation sites and important habitats. We would therefore expect the plan to make reference to the Nene Valley Nature Improvement area (NIA) and include within a policy support for the NIA objectives, in particular the objective " <i>Growth and Development will support, value and benefit the natural environment resulting in net gain in biodiversity by 2020.</i> "</p> <p>Local Biodiversity Action Plans (LBAPs) identify the action required at a</p>	General policies relating to biodiversity protection and enhancement will be included in the JCS. This plan is likely to concentrate on any site specific biodiversity issues.

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						<p>local level to deliver UK and regional targets for habitats, species, public awareness and involvement. They also identify targets for other habitats and species of importance in the more local context of their geographical area. Further information about Biodiversity in the UK is available on the JNCC website, including details relating to UK BAP priority species and habitats.</p> <p>Natural England does not hold protected species records and therefore cannot advise as to the likelihood of their presence on sites. Information on non-statutory sites and species records may be obtained from the local Wildlife Trust and/or the Northamptonshire Biodiversity Records Centre and such information should be considered when assessing sites for development.</p> <p>We also recommend that reference is made to the Natural England Standing Advice for Protected Species which is available on our website. It helps local planning authorities better understand the impact of development on protected or priority species should they be identified as an issue at particular developments. This also sets out when, following receipt of survey information, the authority should undertake further consultation with Natural England.</p>	
34	50	Natural England	Consultation Service Natural England		Question 2	<p>Geodiversity</p> <p>Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.</p> <p>Local authorities should ensure that appropriate weight is attached to the geodiversity interest of designated sites, and also within the wider environment, and maximise opportunities to include this in and around developments as part of the design process. Further information on geodiversity is available on Natural England's website.</p>	General policies relating to geodiversity will be included in the JCS. This plan is likely to concentrate on any site specific geodiversity issues.
35	51	Natural England	Consultation Service Natural England		Question 2	<p>Soils</p> <p>Early consideration should be given to the quality of soil resource on potential development sites and therefore the Local Plan process provides a useful opportunity to consider soils and to ensure their protection during the plan making process.</p> <p>Where significant development of agricultural land is unavoidable, poorer quality land should be used in preference to that of higher quality, except where this would be inconsistent with other sustainability considerations. Paragraph 112 of the National Planning Policy Framework (NPPF) should be referenced when considering the protection of best and most versatile (BMV) agricultural land.</p> <p>Land quality varies from place to place. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of</p>	These comments are noted and will be taken forward for consideration at later stages of the plan making process.

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						<p>sustainable development. Further information is provided on Natural England's website. http://publications.naturalengland.org.uk/publication/35012?category=23033</p> <p>We note that there are substantial areas of Grade 2 and 3a Agricultural land both to the west and east of Wellingborough town and we would advise that poorer quality land should be used in preference to these higher quality areas.</p>	
36	52	Natural England	<p>Consultation Service</p> <p>Natural England</p>		Question 2	<p>Landscape Character</p> <p>Wellingborough Council should consider landscape character when allocating sites for development, particularly designated landscapes, including historic landscapes, to protect their natural beauty and amenity, wildlife and cultural heritage.</p> <p>A landscape character approach should be used to underpin and guide decisions on development and set out criteria based policies for landscape character areas. New development should build-in and ensure that consideration is given to the wider landscape based on landscape assessment.</p> <p>We also suggest that you could make reference to the National Character Areas (NCAs) which divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. The NCAs that fall within Wellingborough Borough are as follows:</p> <p>89: Northamptonshire Vales</p> <p>91: Yardley-Whittlewood Ridge</p> <p>For more information on the NCAs please see our website at: http://www.naturalengland.org.uk/publications/nca/northamptonshire_vales.aspx</p> <p>The Plan should also give consideration to areas of tranquillity where appropriate. Tranquillity is an important landscape attribute and there may be areas worthy of protection within Wellingborough Borough.</p>	<p>The Council adopted a 'Trees and Landscape' SPD in 2013.</p> <p>The JCS will include policies relating to landscape character.</p>
37	53	Natural England	<p>Consultation Service</p> <p>Natural England</p>		Question 2	<p>Green Infrastructure</p> <p>Green Infrastructure (GI) should be an integral part of the creation of sustainable communities and the Local Plan process can provide a useful starting point in the consideration of GI provision and the allocation of sites and policy development through the plan. Full consideration should be given to the objectives and aspirations of Northamptonshire's Environmental Character and Green Infrastructure</p>	<p>This issue will be considered alongside the emerging work from the JCS and further stages of the review of the Local Plan to ensure that these issues are taken into account. Part of the review will involve reviewing Open Space typologies across the borough.</p>

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						<p>Suite.</p> <p>One important function of GI is the provision of new opportunities for access to open space. Natural England's 'standards for accessible natural greenspace' (ANGSt) provides a set of benchmarks, which should be used to ensure new and existing residential development has access to nature. More information can be found on Natural England's publication, ' <i>Nature Nearby, Accessible Greenspace Guidance</i> ' (March 2010), available on our website publication reference NE265.</p> <p>The CABE Space Guidance ' <i>Start with the Park</i>' (2005) outlines the importance of planning around green spaces, with consideration being given to the context of local landscape character and contribution to the wider GI network. The provision of new GI should be considered at an early stage to ensure it is deliverable at plan stage. Another useful reference is Town and Country Planning Association publication <i>Planning for a healthy environment - good practice guidance for green infrastructure and biodiversity</i>.,</p>	
38	54	Natural England	<p>Consultation Service</p> <p>Natural England</p>		Question 2	<p>Climate Change and Sustainable Design</p> <p>Natural England welcomes development that incorporates sustainable design and construction and shows both adaptation to and reduction in the contribution to climate change. We strongly advise the inclusion of climate change adaptation and future climate proofing. Adaptation proposals should be sustainable, avoiding measures which would either exacerbate climate change (e.g. through producing more Greenhouse Gases) or damage the resilience of the natural environment, reducing its ability to withstand growing climate change pressures (e.g. by increasing water stress, pollution, habitat fragmentation, loss of biodiversity both in species and in habitat type). Adaptation measures should make use of the natural environment e.g. tree planting to moderate heat island effects.</p> <p>We recommend reference to the TCPA publication <i>Climate change adaptation by design</i>.</p>	This issue will be included in the JCS.
39	59	Geoff Taylor	Cyclists Touring Club		Question 2	<p><i>Cycling -</i></p> <p>1. <i>Plan should generate an outline plan (i.e. drawing) showing all the current and proposed cycle routes including those serving the SUEs and linking Wellingborough Town to adjoining settlements (whether in WBC area or not) - and including those envisaged within green infrastructure corridors; future routes must recognise the realities of topography.</i></p> <p>2. <i>We should investigate the factors which currently discourage higher levels of cycling within and around the town; address them; and include within the Plan policies on those matters which can appropriately be tackled in a Spatial Plan</i></p>	<p>1. The existing and proposed cycle routes can be shown on the Proposals Map at a later stage in the review process.</p> <p>2. This issue will be considered in further detail taking into account County level cycling policies, proposals and evidence.</p>
40	66	Geoff			Question 2	<p>Review of parking provision and standards -</p> <p>The town's network of older narrow terraced streets provides totally</p>	A balance has to be struck between consideration of the needs of motorists and the

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		Taylor				<p>unsatisfactory parking for today's car ownership levels let alone those of 2031. Cars occupy the path and pedestrians have to take to the road. Drastic solutions will be required with spatial implications</p> <p>In addition, having moved recently to a very small new build development on a private drive, I have to say the access and parking standards applied through planning were inadequate. In particular cars have been getting steadily wider and garages have not - minimum garage width standards please!</p>	<p>Town's heritage status. The traditional street pattern of Wellingborough Town Centre is required to be preserved as a result of heritage considerations.</p> <p>It is unlikely that the scope of the plan will cover minimum garage width standards due to other priorities and time constraints.</p>
41	79	Matthew Stock	Redrow Homes	Senior Planner Pegasus Planning Group	Question 2	<p>A thorough review of village boundaries is required in order to allocate sufficient sites to meet the objectively assessed housing needs, plus a 20% buffer for historic persistent under-delivery. The village boundaries, so as not to arbitrarily restrict the supply of housing, must be based on a transparent and consistent methodology. Redrow consider that robust criteria could then be utilised by Neighbourhood Planning Groups to determine village boundaries (if appropriate, but that the unfounded exclusion of sites and discrepancies between areas would be overcome. For instance, the current Pre-Submission Neighbourhood Plan for Earls Barton (Part 6.1, Criterion F) advocates the exclusion of permitted sites from the village boundaries, for example Land off Compton Way, which was granted permission in 2013. Once constructed, the continued exclusion of sites with permission that contribute to the overall vitality of a village appears somewhat irrational. Redrow, therefore strongly urge the Borough Council of Wellingborough to ensure that the spatial development of the area is not pre-empted by Neighbourhood Plans that either covertly or explicitly seek to restrict sustainable development through excluding suitable, sustainable and deliverable sites from the village confines.</p>	<p>This issue is to be taken forward for consideration during the plan making process.</p>
42	95		Hampton Brook Ltd	Senior Planner DLP Planning Consultants	Question 2	<p>The plan must set out to define and address any cross boundary issues in accordance with the Duty to Cooperate. This includes working collaboratively with other authorities to meet the objective housing and employment needs of the wider area.</p> <p>The need to have regard to the interactions between local authority areas to ensure that objectively assessed development needs are met is a key requirement of the 'Duty to Co-operate' established under Section 110 of the Localism Act 2011. The 'Duty' places a legal responsibility on local planning authorities, county councils and other public bodies to engage constructively, and on an ongoing basis to maximise the effectiveness of plan preparation where it is affected by cross boundary matters.</p>	<p>Agreed.</p>
43	103	Ms Tracy Hogdkins	Barratt Northampton	Senior Planner DLP Planning Consultants	Question 2	<p>The plan must set out to define and address any cross boundary issues in accordance with the Duty to Cooperate. This includes working collaboratively with other authorities to meet the objective housing and employment needs of the wider area.</p> <p>The need to have regard to the interactions between local authority areas to ensure that objectively assessed development needs are met is a key requirement of the 'Duty to Co-operate' established under Section 110 of the Localism Act 2011. The 'Duty' places a legal</p>	<p>This issue will be developed in greater detail as the Local Plan develops and will require further detailed discussion.</p>

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						responsibility on local planning authorities, county councils and other public bodies to engage constructively, and on an ongoing basis to maximise the effectiveness of plan preparation where it is affected by cross boundary matters.	
44	111	Trustee Ecton Estate	Trustee Ecton Estate	Graduate Planner Fisher German LLP	Question 2	<p>The Plan may wish to examine as part of developing its specific spatial strategy, policies and proposals the potential to deliver strategic allocations proposed adjoining neighbouring local authorities that can assist in delivering sustainable development for mixed-use development. Furthermore, its location in close proximity to the future sustainable growth of West Northamptonshire, means it also has an important role in contributing towards the needs of the adjoining West Northamptonshire area.</p> <p>In so doing the Plan should comprehensively examine that the proposals put forward does everything it can to support sustainable development and consequently sustainable economic growth. The plan should proactively plan to meet the development needs of business and support an economy fit for the 21st Century. PBW should be clear in its economic vision and strategy for the area. As such, policies proposed on the PBW should provide flexibility to accommodate needs not anticipated in the Plan and to allow rapid response to changes in economic circumstances.</p> <p>In developing a vision and objectives for the PBW to meet its objectives it is considered that consideration should be given to the opportunity to provide a sustainable urban extension immediately to the east of Northampton adjoining Northampton Borough Council given its excellent location adjoining the strategic highway network for sustainable mixed-use development, the relevant land is shown outlined in red on attached plan. This is consistent with the duty to cooperate with neighbouring authorities, which in the case of the North Northamptonshire Joint Core Strategy is proposing allocations of strategic mixed-use development on land in close proximity to Northampton.</p>	This issue will require further discussion as the plan progresses and will be taken forward to later stages in the review process.
45	117	Councillor Brian Skittrall	Bozeat Parish Council		Question 2	<p>One of the valuable aspects of the NPPF is that it promotes good design. We would like to see guidance on what constitutes good design in the local context (unless this is already covered by the NNJCS) and also support for Village Design Statements and similar documents.</p> <p>Where possible the plan should give unambiguous criteria or guidance to define when different aspects of schemes will be considered acceptable. This will not always be possible (e.g. when considering aesthetic design) but clarity helps both communities and developers.</p>	The JCS will include policies to ensure high quality development and design.
46	131	Mr Paul Lewin	Planning Policy and Heritage Manager Northampton Borough Council		Question 2	Since the review of the North Northamptonshire Joint Core Strategy commenced there have been a number of changes in circumstance which Northampton Borough consider should materially affect the issues and potential content of both the Core Strategy and the Wellingborough Local Plan. The East Midlands Regional Plan which ran until 2026 essentially defined separate housing and employment targets for the North Northamptonshire and West Northamptonshire areas for	Noted. This will require further detailed discussion as the review of the plan progresses.

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						<p>the period to 2026.</p> <p>With regards to Northampton's needs it provided clarity in the sense that the West Northamptonshire Joint Core Strategy became the vehicle to identify how the housing and employment needs of Northampton would be met through the Northampton Implementation Area. Areas within the Borough of Wellingborough were not identified for inclusion within the Northampton Implementation Area (subsequently referred to Northampton Related Development Area within the submitted West Northamptonshire Joint Core Strategy). In seeking to meet the request of the Inspector examining the West Northamptonshire Joint Core Strategy of identifying appropriate allocations to meet objectively assessed housing and employment needs to 2029 and beyond it has become evident that capacity within Northampton Borough to meet these needs will be severely limited and that for future growth it will be increasingly necessary to look beyond the Borough's existing boundaries.</p> <p>In the absence of a Regional Plan that excludes the Borough of Wellingborough from inclusion within the Northampton Implementation Area it is considered by Northampton Borough that the issue of potentially addressing some of Northampton's housing and employment needs within the Borough of Wellingborough is required to be dealt with satisfactorily. The Council considers that for development post 2029 that at the very least for the purposes of Sustainability Appraisal/ duty to co-operate that potential sites within the Borough of Wellingborough should be viewed as reasonable alternatives for the purpose of testing development related to meeting Northampton's needs.</p> <p>Northampton Borough Council is mindful of the reasons why it is necessary that the North Northamptonshire Joint Core Strategy is being reviewed and of its proposed timescale and why Wellingborough's Local Plan is proposed to follow a similar timeline. Nevertheless, the timing of the North Northamptonshire review together with the differing end dates for plans in the North and the West means that without concerted effort of joint working between the respective authorities there is the potential for greater complication in relation to development planning, in what is already a complicated arena. Northampton Borough Council does not wish to frustrate timely progression of plan making in North Northamptonshire or Wellingborough, or indeed in West Northamptonshire. However, in the absence of structures/processes associated with assessing a Regional Plan or Structure Plan which historically have provided the opportunity for a more holistic co-ordinated view of the wider county/sub-region, the processes for identifying and testing a combined strategy for North and West Northamptonshire for a defined period needs clarity of approach.</p>	
47	125	Mrs Carol	Clerk to Great Doddington Parish Council		Question 2	The overall highway structure requires more detailed examination also controls over speed and volume through villages such as Gt.	The review of the Local Plan is unlikely to have direct control over traffic speed as this is not a

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		Mundy	Great Doddington Parish Council			<p>Doddington.</p> <p>The plan is expansionist. It is vital care should be taken to allow for adequate educational and health support.</p> <p>The provision of high speed broadband to all areas is essential. Currently only half of Gt. Doddington can receive fibre-optic service.</p>	<p>land use planning matter.</p> <p>It is agreed that the Local Plan needs to allow for adequate educational and health care needs, part of which will also be addressed via CIL which is subject to a separate consultation.</p> <p>This issue is addressed in the Northamptonshire Transportation Strategy 2012.</p>
48	134	Mrs Linda Ross	Clerk to Mears Ashby Parish Council Mears Ashby Parish Council		Question 2	<p>Regarding Sywell aerodrome: "SY1" should be retained and properly enforced.</p> <p>The Highways infrastructure required to support the proposed development needs to be determined and debated.</p> <p>We have data that shows that existing roads do not adequately provide for today's traffic levels, Also, that "weight restricted" roads are not subjected to effective enforcement.</p> <p>A requirement for HGV parking facilities needs to be investigated. (A survey in 2007 showed there to be insufficient evidence of the need at that time - a situation that will have changed as B8 sector activity has increased in the meantime)</p> <p>There is no reference that we can find covering "mining and quarrying". In order to sustain the development proposed, we consider that gravel and aggregates should be mined locally.</p> <p>The timetable leading to the roll out of Broadband should be included, and possibly accelerated to meet demands</p>	<p>Sywell aerodrome will be considered at the Issues and Options stage of the review.</p> <p>Transport issues will be considered during the plan making process. However, some transport matters are considered at County level, particularly in the Northamptonshire Transportation Strategy 2012. These issues will be looked at alongside this document.</p> <p>Mining and Quarrying issues are dealt with via Northamptonshire's Minerals and Waste Local Plan which has recently been subject to an examination.</p> <p>This issue is addressed in the Northamptonshire Transportation Strategy 2012. The timetable for rollout of broadband would not be a land use planning issue covered by this review.</p>
49	12	Mr George Shipman	Chairman Wellingborough RFC		Question 3	<p>I note that the plan seeks to be evidence based and does state in the preamble that of course a number of the documents have become dated. In respect of the policies under the heading of 'Open space and sports facilities', please note that the Rugby Football Union (RFU) in England now has an updated National Facilities Strategy covering 2013-2017.</p> <p>RFU (Rugby Football Union) the sport's governing body in England, has a national participation strategy looking to increase the focus on clubs playing more local sides, completion in merit tables rather than purely league completion with increasing distances to travel and losing local contacts and fixtures. They are also promoting different forms of rugby union such as 7 a side (now in the Olympics and Commonwealth games) 10 a side as well as the more well known, 15 a side format, which should be considered.</p>	<p>Part of the review process will seek to update open space, sport and recreation provision, therefore this issue will be taken forward as the review progresses.</p>
50	25	Mrs Esme			Question 3	<p>Northamptonshire County Council Highways welcomes the opportunity to comment on the Plan for the Borough of Wellingborough.</p>	<p>Noted. Comments welcomed.</p>

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		Cushing				The evidence base list in Appendix 1 refers under Transport to the Transport Strategy for Growth. This has now been superseded by the Northamptonshire Transportation Plan which was adopted by the County Council in March 2012, followed subsequently by a series of associated daughter documents. These adopted documents should form the evidence base for the Plan.	
51	24	Mrs S Spencer	National Federation of Gypsy Liaison Groups		Question 3	There are questions about the adequacy of the GTAA update	This issue will be taken forward as the review of the plan progresses.
52	28	Mr Steven Beard			Question 3	<p>The plan needs to take account of the existing and future needs for sports facilities both indoor and outdoor including playing fields. Parts of the evidence base are considered to be out of date and therefore not robust. The authority should plan positively para 70 NPPF this is not possible if the evidence base is out of date. Para 73 requires up to date and robust evidence the evidence does not include a Playing Pitch Strategy</p> <p>Planning for Open Space Sport and Recreation - 2005 - out of date</p> <p>Wellingborough Sports Facilities Strategy - 2008 - out of date</p> <p>North Northamptonshire strategic sports facilities Framework 2010 - This document deals with main sports facilities but without update the and given that the evidence gathering will be before the adoption date this document is also now becoming out of date and may not be considered robust</p>	Part of the review process will include a review of evidence for sport and recreation.
53	42	WCS	Wellingborough Civic Society		Question 3	Flood Risk Assessment 2006, Employment Land Study & Open Spaces/Sports/Recreation documents now seem somewhat out of date	Part of the review process will include a review of evidence for Flood Risk, Employment Land, Open Space/Sport and Recreation.
54	33	Mr Colin Staves	Principal Spatial Planner West Northamptonshire Joint Planning Unit		Question 3	Elements of the evidence base in respect of employment / economy appear somewhat dated. Given the likely ongoing pressure for employment development, particularly along the A43 corridor, a more up to date assessment of employment land requirements could be considered.	Part of the review process will include an Employment Land Review to address this issue.
55	36	Mark White	Historic Environment Planning Advisor English Heritage		Question 3	We consider that critical to all this, is a comprehensive evidence base, in accordance with paragraphs 169 and 170 of the NPPF. A detailed historic environment evidence base will help to improve understanding of local character and heritage assets, assess significance, establish condition, highlight important and sensitive sites, and help predict the likelihood that heritage assets might be discovered in the future. As part of the development of the Wellingborough Plan, as well as undertaking a review existing sources of evidence, particularly that sourced for the work on the forthcoming Core Strategy, such as the Draft Urban Structure Study, you may also need to undertake new assessment. This is particularly relevant in relation to site allocations and designations	Noted. Further discussion is welcomed. It should be noted that Conservation Area Appraisals and Local Lists would take place outside of the Local Plan process.

Rep No.	ID	Full Name	Organisation Details	Agent	Number	Representation	Draft Officer Response
						<p>and could include the following:</p> <ul style="list-style-type: none"> ▪ updating conservation area appraisals ▪ undertaking characterisation studies ▪ producing setting studies - of specific settlements, or specific heritage assets ▪ local lists ▪ assessments of landscape sensitivity. <p>English Heritage has produced a suite of guidance on which may be of use, including 'Understanding Place' 'Good Practice Guide for Local Heritage Listing' 'The Setting of Heritage Assets' and 'Guidance on Conservation Area Appraisals' which may be of use for you. These, and a number of other documents, can all be downloaded from www.helm.org.uk .</p>	
56	93	Mrs SUSAN SUTTLE			Question 3	<p>The Borough's attitude towards quality specialist retail in the town centre is laudable in that it seeks to encourage that which is not offered in neighbouring towns, a quality which should also extend to new development throughout the Borough. The existing evidence on retail in the area, as reported by Drivers Jonas remains valid from 2008 in as much as the Nursery, Pub and Retail still thrive and are used by Redhill Grange residents, frequently accessed by footpath without the need to cross any roads. This is an important point when assessing retail and centres for new developments that they should indeed be central to the development and to comply with the aims of the Core Spatial Strategy discourage road use. It also refers to the other retail centre/Tesco local within the Gleneagles development. Logically, the site of any further local retail development should therefore be sited within the greater development and away from both main roads, junctions/roundabouts if it seeks to discourage car use and conflict or compete with that which already exists.</p>	<p>Issues relating to supporting retail in the town centre, reducing the need to travel by car where a range of sustainable transport options are available, together with encouraging pedestrian and cycle use are likely to be taken forward and supported in the plan review.</p>
57	60	Geoff Taylor	Cyclists Touring Club		Question 3	<p>On the whole yes, although some documents now seem to be nearing their expiry date</p>	<p>Noted. As the review progresses it is intended that the evidence base is brought up to date.</p>
58	67	Geoff Taylor			Question 3	<p>On the whole yes</p>	<p>Noted.</p>
59	78	Matthew Stock	Redrow Homes	Senior Planner Pegasus Planning	Question 3	<p>Redrow have previously made representations in relation to the evidence base that underpins the housing needs evidence (Q3/4); a copy is enclosed for information. The Borough Council are asked to note the previous submissions to the North Northamptonshire Joint Planning Unit in respect of the emerging Core Strategy Review,</p>	<p>The evidence associated with objectively assessed housing needs will be addressed in later stages of the review and will be updated regularly.</p>

Rep No.	ID	Full Name	Organisation Details	Agent	Number	Representation	Draft Officer Response
				Group		<p>particularly in relation to policies relating to the supply of housing (Draft Policy 28). In summary, Redrow challenge the notion that the policies contained within the Core Strategy Review and the evidence which underpins them, provide a positive strategic framework from which to base the Local Plan.</p> <p>Redrow Homes readily acknowledge the comment at paragraph 2.1 of the Consultation that the Local Plan "will supplement the strategic policies" in the North Northamptonshire Joint Core Strategy and the content of paragraph 7.1 which observes that the JCS "will set out the overall objectively assessed housing needs for the borough". The preparation of the Local Plan will be profoundly influenced by the eventual text of the JCS and Redrow wish to place before the Borough Council their profound misgivings about the Interim Statement on Housing Requirements in the North Northamptonshire Housing Market Area (NN HMA) as agreed by the Joint Planning Committee on the 9th January 2014 and its relationship with plan making. The position was made known to the Borough Council of Wellingborough in relation to an application for Land off Station Road, Earls Barton, by virtue of the late letters list as reported to the Planning Committee on the 29th January 2014.</p> <p>It is clear to Redrow that the approach described in the Interim Housing Statement will underpin the housing figure to be included in the JCS (and then the Site Allocations) review through the use of a common evidence base. Redrow Homes have thoroughly reviewed the content of the report placed before the Joint Committee, including background and supporting evidence regarding the response to the consultation on the IHS.</p> <p>Redrow contend that the Draft Statement has been produced in an attempt to achieve a five-year housing supply position across North Northamptonshire at the present time by proposing a reduction in the housing provision established in the extant development plan without a sustainability appraisal or independent scrutiny/ examination thus leading to a position by which fewer sites will need to be identified and allocated through the Local Plan. The housing provision figures established in the NNCSS can only be amended via the preparation and adoption of a formal review of the Core Spatial Strategy, which is acknowledged to be underway, although it may be some time before the plan is examined and the figures are subjected to the rigour of independent examination.</p> <p>The representation to the NNJPU highlights a number of matters including the conflict between emerging Draft Policy 28 and the direction of the NPPF to boost significantly the supply of housing (NPPF paragraph 47) through, for example, the rolling forward of previous delivery from a recessionary period. Without critical analysis of the housing evidence, Redrow caution that the Local Plan for Wellingborough will not meet the required level of housing need exacerbating matters relating to supply and deliverability of housing in the area. The Borough Council are, therefore, respectfully asked to</p>	

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						<p>ensure that their plan, including the housing evidence, is reviewed thoroughly to ensure that it conforms fully to the guidance set out in the National Planning Practice Guidance and is based on sound, objectively assessed data which takes into account the wider spatial influences on the district, including the pending decision on Rushden Lakes which will have significant impacts on future economic and housing demands within the area.</p> <p>Redrow remains concerned that the allocation of rural development through Neighbourhood Plans, which are based on the evidence set out in the Consultation Document, will not deliver a comprehensive, coordinated strategy to significantly boost the supply of housing within the district as required. A recent national review of Neighbourhood Plans carried out by Turley 1 found that over 55% of plans, rising to 63% in rural areas, primarily seek to restrict and resist residential development. Moreover, there is currently little evidence to suggest that rural areas within Wellingborough will approach Neighbourhood Planning more positively. For example, the Earls Barton Neighbourhood Plan seeks principally to restrict development beyond a pre-determined threshold.</p>	
60	82		Bletsoe Brown and Sywell Aerodrome Ltd	Partner Marrons Shakespeares	Question 3	It is essential that the PBW is based on robust up-to-date evidence that takes full account of relevant market and economic signals. In this context, there needs to be a full understanding of the Borough's future housing and business needs. In respect of housing, these can only be established through the preparation of a Joint Strategic Housing and Market Assessment with neighbouring authorities, which it is understood is currently being prepared. It will be similarly important for the Council also to review its evidence base in relation to economic development, and specifically the needs of the business community.	Noted. Part of the review process will look at updating the evidence base in line with the NPPF.
61	96		Hampton Brook Ltd	Senior Planner DLP Planning Consultants	Question 3	<p>Paragraph 158 of the Framework requires that Local Plans are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. It is imperative however, that any assessments/studies that are undertaken are objectively based and utilise the most up to date data sets and do not simply look at Wellingborough in isolation and take into account the interaction(s) between Wellingborough and neighbouring LPA areas, particularly in relation to future housing and employment needs.</p> <p>DLP holds some concern that certain components of the existing evidence base cannot be considered to be 'up-to-date' in accordance with the Framework, in particular:</p> <p>Employment Land Study (2006)</p> <p>Commercial Property and Employment Land Assessment (2006)</p>	Noted. Part of the review process will look at updating the evidence base in line with the NPPF.

Rep No.	ID	Full Name	Organisation Details	Agent	Number	Representation	Draft Officer Response
						<p>Transport Strategy for Growth (2007)</p> <p>These studies are already severely out of date and by the time the Plan is anticipated to be adopted (2017) will be over 10 years old. We suggest that a thorough review of these important documents is essential to support any future growth in the Borough. It is imperative that a comprehensive evidence base is produced to support the new Local Plan and that this evidence is prepared utilising an appropriate base date. A continuation and update of the existing evidence base prepared to support the previous plans cannot be considered up to date for a plan that will govern development aspirations up to 2031.</p> <p>Up to date technical and supporting evidence at a site specific level should also be considered.</p>	
62	104	Ms Tracy Hogdkins	Barratt Northampton	Senior Planner DLP Planning Consultants	Question 3	<p>Paragraph 158 of the Framework requires that Local Plans are based on adequate, up to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. It is imperative however, that any assessments/studies that are undertaken are objectively based and utilise the most up to date data sets and do not simply look at the borough in isolation and take into account the interaction(s) between Wellingborough and neighbouring LPA areas and the development needs of the wider area, particularly in relation to future housing and employment needs.</p> <p>DLP holds some concern that certain components of the existing evidence base cannot be considered to be 'up-to-date' in accordance with the Framework, in particular:</p> <ul style="list-style-type: none"> • Employment Land Study (2006) • Commercial Property and Employment Land Assessment (2006) • Transport Strategy for Growth (2007) <p>These studies are already severely out of date and by the time the Plan is anticipated to be adopted (2017) will be over 10 years old. We suggest that a thorough review of these important documents is essential to support any future growth in the Borough. It is imperative that a comprehensive evidence base is produced to support the new Local Plan and that this evidence is prepared utilising an appropriate base date. A continuation and update of the existing evidence base prepared to support the previous plans cannot be considered up to date for a plan that will govern development aspirations up to 2031.</p>	See comments above.
63	112	Trustee Ecton Estate	Trustee Ecton Estate	Graduate Planner Fisher German LLP	Question 3	<p>The PBW must be based on robust evidence that takes full account of relevant market and economic signals, this therefore needs to be a full understanding of the Borough's housing needs which can only be established through the preparation of a Joint Strategic Housing and Market Assessment with neighbouring authorities, which it is understood is currently being prepared.</p>	This issue will require further discussion and consideration as the plan progresses.

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						Once the needs of the Borough have been established, the level of growth required should be distributed in the most sustainable manner, an approach advocated by the National Planning Policy Framework and on the basis referred to above. As such in our view the land immediately to the east of Northampton represents an obvious location for a new sustainable development. As part of considering sustainable development locations over the plan period to meet the Borough's needs that new mixed-use development opportunities are considered in locations such as this adjoining the A4500 well located to the strategic highway network as a sustainable location serving and served by services, facilities and infrastructure close to Wellingborough and Northampton.	
64	118	Councillor Brian Skittrall	Bozeat Parish Council		Question 3	<p>We do not consider that the documents <i>Developing a settlement hierarchy for the North Northamptonshire Joint Core Strategy, Background Paper - Final Report, July 2012</i> and <i>Rural Settlement Hierarchy published by the Borough Council of Wellingborough September 2009. Site Specific DPD - Preferred Options</i> to be robust. Although these documents are relatively recent, they do not use an up to date evidence base but rely upon evidence bases that date back at least as far as 2001.</p> <p>Since 2001 there has been a significant loss of employment sites in Bozeat as businesses have closed and their sites have been redeveloped as housing. There have also been substantial reductions in the bus services (the only public transport option in the village). Some bus services have been removed entirely and the remaining services have been reduced to such an extent that there is effectively no longer a viable public transport option for residents to access employment outside of the village.</p> <p>The assessment of the facilities and employment opportunities in Bozeat and therefore its assessment of Bozeat in the Assessment matrix (section 6.0) is inaccurate and its consequent classification of Bozeat as a Network Village (in Paragraph 7.0) is likely to be unsupportable.</p> <p>This document is also opaque in that it often does not give definitions of terms used and does not specify the criteria by which villages are assessed. In particular we have, as yet, been unable to find a clear definition of a Network Village, but this would appear to elevate the development potential for Bozeat above its current classification (and the classification included in the Draft NNJCS) as "restricted infill".</p> <p>The NNJCS paper does not contain a definition of the different weighting categories used in the Assessment Matrix and it does not contain any explanation of the criteria by which each of the service categories are scored although it does observe that some scores are subjective. Some guide to the categories can be obtained from the referenced <i>North Northamptonshire Market Towns & Regeneration Study (NNMT&RS)</i> ^[1] from which the categories originate but this is still far from clear. It is notable that the NNMT&RS concluded that Bozeat</p>	<p>The current review of the Local Plan seeks to update the existing evidence base and Site Specific DPD preferred options document, which as the author says, contains older evidence that requires updating. The development strategy for the area will however be determined through the JCS.</p> <p>Issues relating to loss of employment sites will be dealt with as part of the Employment Land Review.</p> <p>The review of the plan is unlikely to be able to directly influence bus service provision, but it is likely to make reference to the need to include options for sustainable transport choices in a land use planning context.</p> <p>This issue will be considered alongside the emerging policies of the JCS review and as the review progresses to determine what further details are required in relation to villages.</p> <p>See comments above.</p>

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						<p>has a " <i>mainly residential role, with limited local services</i>" and that it was " <i>unlikely to function as a Local Service Centre to any great degree although has primary school and GP.</i>" This study also considered that there was " <i>need for improvement</i>" in public transport. Given that this assessment predates the significant loss of employment opportunities and the substantial reduction in bus services mentioned above, it is more than a little surprising that the 2012 Settlement Hierarchy document could promote Bozeat to the status of a Network Village.</p> <p>The age of the data used in the evidence base is of particular concern because the data does not reflect the effects of the significant changes in Bozeat in recent years. For example the assessment states that that there are "major inflows" for employment into the village (defined in as more than 10 employees travelling into the village to work). Following through to the evidence base used to support this score, it transpires that this derives from the 2001 Census which has long been superseded by the 2011 Census and therefore predates the two factory closures. It is most unlikely that there is currently a "major inflow" to employment in the village and in fact there will necessarily be a greater outflow from the village as residents who used to work in the village have been forced to travel out of the village to access employment elsewhere.</p> <p>Even the 2011 census data will still not reflect the more recent reductions in public transport provision which have reduced the employment opportunities accessible by public transport that are now available to residents. A consequence of the loss of viable public transport options to access employment in our views means that any development in the village would be considered unsustainable in transport terms as defined in the NPPF.</p> <p>We acknowledge that theoretically residents could access employment along the W8 bus route (to Wellingborough), however the preliminary results from the <i>Bozeat Village Plan Update 2014</i> indicate that no residents use public transport to access employment. We find this unsurprising because the first bus from Bozeat arrives at Wellingborough at 08:30 and the last bus back to the village leaves Wellingborough at 17:37. This leaves minimal time to travel on to employment sites from central Wellingborough and a similarly leave minimal time to return to central Wellingborough in time to catch the last bus back to the village. The uncertainty about the ability to catch the last bus back to the village should it not be possible to leave work promptly at 17:00 would on its own be a significant deterrent to the use of this service.</p> <p>The "needs" for Bozeat referred to in category I under appear to be derived from a Parish Council's response to a Borough Council request to identify projects upon which Section 106 funds might be used. We consider the inclusion of this in the matrix as an unsatisfied need to be wholly misleading. Every community can produce a wish list of projects that could be implemented if there was a windfall of funding such as that provided by Section 106 agreements. The projects suggested by</p>	<p>Part of the review process will seek to update the evidence base.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Rep No.	ID	Full Name	Organisation Details	Agent	Number	Representation	Draft Officer Response																																								
						<p>the Parish Council can in no way be described as "unsatisfied needs" that could only be funded by new development. The "needs" listed are:</p> <p>a pocket park; in addition there is a need for a children's play area, further allotment land, a community resource centre and the provision of facilities for the youths of the village on the existing playing field</p> <p>The Parish Council did not receive any Section 106 funding and so have now set aside funds to progress the pocket park and the provision of facilities for the youths of the village on the existing playing field. We do not currently have any plans to create a new children's play area or a community resource centre. There was a demand spike for allotments caused by a TV programme promoting home grown produce but this has subsided leaving us with spare allotment plots. There may soon be another spike caused by The Big Allotment Challenge TV programme, but we anticipate that if this occurs it is likely to be transient as it was before.</p> <p>We consider that the Assessment Matrix (6.0) for Bozeat should be adjusted as follows:</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Current Score</th> <th>Corrected Score</th> <th>Reason</th> </tr> </thead> <tbody> <tr> <td>A, B and C</td> <td>13 (total)</td> <td>Reduced</td> <td>Bozeat does not have comprehensive services all three of these categories are given maximum scores</td> </tr> <tr> <td>D</td> <td>6</td> <td>6</td> <td>No change</td> </tr> <tr> <td>E</td> <td>4</td> <td>3</td> <td>There is no longer an evening bus service</td> </tr> <tr> <td>F</td> <td>2</td> <td>0</td> <td>Employment sites have closed down since</td> </tr> <tr> <td>G</td> <td>3</td> <td>0</td> <td>We understand that there is a waiting list at Primary school now that its Ofsted ratings improved</td> </tr> <tr> <td>H</td> <td>0</td> <td>0</td> <td>No change</td> </tr> <tr> <td>I</td> <td>6</td> <td>0</td> <td>There are no "needs" that are not already progressing due to lack of funding from development</td> </tr> <tr> <td>J</td> <td>0</td> <td>0</td> <td>Unchanged</td> </tr> <tr> <td>Total</td> <td>34</td> <td>21 or less</td> <td></td> </tr> </tbody> </table> <p>The extent of the error in the assessment for Bozeat is substantial and could explain the categorising of the village as a Network Village.</p> <p>The North Northamptonshire Strategic Housing Land Availability Assessment (SHLAA) - 2009, Roger Tyms is also inaccurate in that in some instances it records landowner support for developments that were put forward without landowner support.</p> <p>[1] North Northamptonshire Market Towns & Regeneration Study, November 2005</p>	Category	Current Score	Corrected Score	Reason	A, B and C	13 (total)	Reduced	Bozeat does not have comprehensive services all three of these categories are given maximum scores	D	6	6	No change	E	4	3	There is no longer an evening bus service	F	2	0	Employment sites have closed down since	G	3	0	We understand that there is a waiting list at Primary school now that its Ofsted ratings improved	H	0	0	No change	I	6	0	There are no "needs" that are not already progressing due to lack of funding from development	J	0	0	Unchanged	Total	34	21 or less		<p>Noted.</p> <p>Noted. Issues associated with villages will be considered as the review progresses.</p> <p>Noted</p>
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						http://www.nnjp.org.uk/publications/docdetail.asp?docid=68	
65	126	Mrs Carol Mundy	Clerk to Great Doddington Parish Council Great Doddington Parish Council		Question 3	Lack of employment data and skills analysis suggests Wellingborough will become dependent upon low skills job. A depressing feature.	As the plan develops employment and skills data will become available and will be incorporated both into revised evidence, the Sustainability Scoping report and into the plan as the review progresses.
66	135	Mrs Linda Ross	Clerk to Mears Ashby Parish Council Mears Ashby Parish Council		Question 3	No - see below The evidence covering renewable energy requires updating to include the recent restriction on the development of "on shore" wind farms. The employment data is insufficiently researched, eg no identification of jobs created to support the proposed plan in respect of the necessary health and education infrastructure. No review of the "quality, scope and spread" of new jobs has been undertaken. If Wellingborough becomes overly dependent upon jobs in the B8 distribution sector the local economy is condemned to remain a low skill/ low wage area. A recent CBI report provides employment forecasts which at least raises the question of the validity of your data.	Issues associated with renewable energy will be considered alongside the emerging JCS review and as the review process progresses. This issue will be dealt with in the Employment Land Review which will form part of the evidence base. As above. As above.
67	123	Daniel Oladejo	Planning Specialist Environment Agency		Question 3	Land and Water In terms of protecting land and water in the context of questions 3 and 4; which seek to establish whether the evidence gathered is robust and if any new studies are required, we state that: From our review of the evidence supporting the emerging plan, the latest information concerning water quality and sewerage is dated 2011 Water Cycle Study (WCS). We recommend that confirmation is sought of the proposals contained within that document. In particular, for planned infrastructure upgrades to the relevant Wastewater Treatment Works (WTW) and the network that would be sufficient for achieving such upgrade plans. We believe Anglian Water Services (AWS) are	Comments are welcomed and noted. These issues will be taken forward for consideration as the review progresses.

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						<p>best placed to offer the required information and advice.</p> <p>We are aware that strategic water supply upgrades have been completed, as Morcott WTW and the new pipeline have been commissioned. Sewerage Infrastructure upgrade details should be confirmed with AWS so that the planned phased development matches sewerage capacity.</p> <p>For example, we expect that the foul water network will have sufficient capacity for the additional flows, by so doing development upstream of a combined sewer overflow will not spill more frequently or for a greater duration. Similarly, we expect the receiving WTWs to accept the additional flows and loads from development without causing deterioration in the receiving watercourse. The Water Framework Directive (WFD) standards for the River Nene, River Ise and Slade Brook among others require that we improve these watercourses, particularly in relation to phosphate concentration. Generally the main point source of phosphate is sewage effluent.</p> <p>Early pre-application discussions should be held with us if on site temporary solutions (e.g. package treatment plants, cess pools) are being considered, as a Water Discharge Activity (WDA) Permit may not necessarily be granted.</p> <p>During construction phase, WDA Permits/Registering of Exempt WDA will be required for de-watering activities; the applicant should discuss these requirements (as well as pollution control) with the local Environment Management Team before construction commences.</p> <p>Any Sustainable Drainage Systems (SuDS) should incorporate pollution control features - for example anti-scour features at outfalls that discharge to a watercourse. Any SuDS that will serve industrial/commercial developments should have appropriate pollution control, for example fire fighting run-off containment to protect downstream watercourses, Sites of Special Scientific Interests (SSSI) etc. SuDS should also be subject to a management agreement that will ensure long-term maintenance.</p> <p>Groundwater and Contaminated Land</p> <p>In terms of protecting groundwater and remediating contaminated land, of which questions 3 and 4; seek to establish whether the evidence gathered is robust and if any new studies are required, our opinion is:</p> <p>In addition to the comments with made which we believe have been included in the Joint Core Strategy stage we recommend the following text:</p> <p><u>Brownfield sites and sites that may be affected by contamination</u></p> <p>All new development must take into account the potential environmental impacts on people, buildings, land, air and water arising from the</p>	

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						<p>development itself and any former use of the site, including, in particular, adverse effects arising from pollution. Land affected by contamination may pose an unacceptable risk to human health, the environment including groundwater, the built environment and economic activities, through its impacts on the users of the land, and on neighbouring users. Land contamination, or the possibility of it, is therefore a material planning consideration in taking decisions on individual planning applications.</p> <p>Where development is proposed on a site which is known or has the potential to be affected by contamination, a preliminary risk assessment should be undertaken by the developer as the first stage in assessing the risk. Preliminary assessments and any subsequent additional information should be carried out in accordance with our Contaminated Land Report 11 (CLR 11) 'Model Procedures for the Management of Land Contamination'.</p> <p>There is additional advice in the Environment Agency's 'Guiding Principles for Land Contamination' documents.</p> <p>New activities need to be deterred in certain areas based on their intrinsic hazard to groundwater. The hazard may result from a combination of the activity type, its duration and the potential for failure of controls. Additionally, new developments should not pose an unacceptable risk of pollution to groundwater from sewage effluent, trade effluent or contaminated surface water. This also applies where the discharge will cause pollution by mobilising contaminants already in the ground. The document detailed below highlight best practice and would make suitable references to support the plan:</p> <ul style="list-style-type: none"> • Groundwater Protection: Principles and Practice (GP3) <p>Water Quality</p> <p>In terms of safe guarding and improving water quality with regards to questions 3 and 4; which seek to establish whether the evidence gathered is robust and if any new studies are required, our opinion is:</p> <p>There are three documents referred to in the emerging plan.</p> <p>North Northants Detailed Water Cycle Strategy dated Oct 2008, North Northants Outline WCS Technical Report dated Jan 2007 and Waste Water Capacity Study Interim Findings dated Sept 2007. These documents were prepared before the WFD was implemented and should benefit with an update.</p> <p>Wellingborough is in the sewerage catchment of Broadholme Sewage Treatment Works. The impact of increased discharge flows of sewage effluent may lead to deterioration or prevent the achievement of WFD targets in the river Nene.</p>	

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						<p>Flood Risk</p> <p>In terms of reducing flood risk with regards to questions 3 and 4; which seek to establish whether the evidence gathered is robust and if any new studies are required, our opinion is:</p> <p>The evidence base includes the latest Strategic Flood Risk Assessment (SFRA) for Wellingborough which is fairly appropriate. However, please note that since the SFRA was completed in February 2011 additional data in relation to flood risk has become available. We updated the flood map for planning (rivers and the sea) in December 2013 based on the latest run of the river Nene catchment strategic model. This means fluvial flood extents may have changed as a result of the data update. There is also additional data available in the flood map for surface water and risk of flood from reservoirs.</p> <p>Given that the National Planning Policy Framework did not fundamentally alter the policy approach to flood risk from that set out in Planning Policy Statement (PPS)25, we would not expect that the SFRA would need to be updated in its entirety. However, we recommend that you local authority set out an approach to consider the latest data either through an SFRA update or a separate use of the data to inform the plan.</p> <p>The plan should also take into account of the emerging Surface Water Management Plans and any legislative changes that have occurred as a result of the Flood and Water Management Act 2010 that may not have been addressed in the SFRA.</p>	
68	13	Mr George Shipman	Chairman Wellingborough RFC		Question 4	I would suggest that the RFU National Facilities Plan and Participation plan should be taken into consideration. The borough has changed and if time/resources allowed, the Sports Fields needs should be reassessed	This issue can be taken forward and receive consideration as part of the review of sports provision within the borough.
69	26	Mrs Esme Cushing			Question 4	<p>Northamptonshire County Council Highways welcomes the opportunity to comment on the Plan for the Borough of Wellingborough.</p> <p>The Northamptonshire Transportation Plan was adopted by Northamptonshire County Council in March 2012, followed subsequently by a series of daughter documents. The Plan should be prepared in light of the key principles and policies within these documents. It is also worth noting that Northamptonshire County Council is planning to adopt the Wellingborough Town Transport Strategy in 2014, and similarly this will provide a valuable evidence base for the Plan to draw on.</p> <p>Northamptonshire County Council Highways welcomes the opportunity for early discussions with the Borough Council of Wellingborough in respect to infrastructure requirements, funding and provision and impacts on phasing of development.</p>	Noted. Further discussion welcomed.
70	43	WCS	Wellingborough		Question	See above - no other suggestions	Noted.

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			Civic Society		4		
71	56	Bovis & SCLG	Bovis Homes Ltd & Stanton Cross Land Owners Group	Define	Question 4	In terms of public open space provision it seems that the existing evidence base will need to be refreshed.	Agreed.
72	61	Geoff Taylor	Cyclists Touring Club		Question 4	Yes - as Q2 above, a user study is required, to investigate what factors prevent higher levels of cycling within Wellingborough Town, and to/from nearby settlements (including those outside WBC area)	<p>It is unlikely that sufficient resources are available to undertake such a study, but the issue of trying to encourage greater use of sustainable forms of transport including increasing cycling use will be taken forward as the review progresses.</p> <p>The evidence base will be updated to include the following cycling strategy: http://www.northamptonshire.gov.uk/en/councilservices/Transport/TP/Pages/NTP-thematic-strategies.aspx.</p>
73	70	Geoff Taylor			Question 4	<p>See Q2 response -</p> <ol style="list-style-type: none"> 1. on street car parking study 2. develop garage width policy 	<p>Evidence in relation to Wellingborough Town Centre's existing car parking provision will form part of the review process, in terms of car parks. Transportation issues will be reviewed within the context of the Northamptonshire Transportation Strategy 2012 and daughter documents.</p> <p>Paragraph 158 of the NPPF relates to the need to use a proportionate evidence base. It is unlikely that resources will allow for a garage width policy study, as it is unlikely that the Local Plan will contain a policy that would be used to refuse planning permission for garages that did not conform to a minimum width.</p>
74	73	Heather Webb	Natural Development Officer Nene Valley Nature Improvement Area (NIA)		Question 4	<p>Yes, there are two documents which should be added to the evidence base:</p> <ul style="list-style-type: none"> • Visitor access study of the Upper Nene Valley Gravel Pits SPA, commissioned by the Nene Valley Nature Improvement Area (Liley D, Floyd L, Cruickshanks K & Fearnley H. 2014. Visitor Access Study of the Upper Nene Valley Gravel Pits SPA. Wareham, Dorset: Footprint Ecology. Unpublished report for the NIA partnership). The study reveals the extent, nature and intensity of visitor pressure on the SPA, which Natural England has identified as suffering from high visitor levels. As Wellingborough includes much of the SPA the study findings should be used to inform the Local Plan and related policies. The study is available online at http://www.nnjpu.org.uk/publications/docdetail.asp?docid=1437. 	Noted. Additional information welcomed and will be incorporated into later stages of the review process.

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						<ul style="list-style-type: none"> Study of accessible natural greenspace per Natural England's Accessible Natural Greenspace Standard (ANGSt). The data and maps illustrate where deficiencies exist in neighbourhood-scale (i.e. ≥2ha) natural areas and where natural greenspace should be developed to provide residents with ready access to nature. The 2013 study has been attached with this submission (the 2014 update is still in progress). ANGSt maps for Wellingborough have also been appended below. 	
75	83		Bletsoe Brown and Sywell Aerodrome Ltd	Partner Marrons Shakespeares	Question 4	In light of the above comments, and the importance of establishing a policy framework to address the future growth of Sywell Aerodrome and its environs, it will be important to ensure a robust evidence base is available to support such policies. This will need to cover the economic, social and environmental implications of growth, and assess the various constraints and opportunities presented by the Aerodrome and adjacent land. My client is keen to explore this further with the Council in ensuring an evidence base that provides a sound basis for the Plan and its policies relevant to the Aerodrome.	Sywell Aerodrome will be taken forward as the review progresses.
76	97		Hampton Brook Ltd	Senior Planner DLP Planning Consultants	Question 4	In March 2014 Northamptonshire Economic Partnership (LEP) submitted their Strategic Economic Plan (SEP) to the Government. This document seeks a share of the Government's £2bn Local Growth Fund and sets out the LEP's ambitious target to help deliver 80,000 new homes and 70,000 new jobs in Northamptonshire by 2031. The SEP therefore constitutes a significant piece of evidence to support the preparation of the new Local Plan for Wellingborough and should be identified as such.	Comments welcomed. This document will be added to the evidence base.
77	100	Mrs SUSAN SUTTLE			Question 4	Biodiversity would seem to be the only measure for preservation of green space, trees or hedgerows. Age, history, recreational value or noise/pollution reduction does not seem to apply, as was the case with the Lime Avenue in the southern gateway to the town. It would seem that better protection is required within the Borough. Archaeological remains are equally vulnerable. There is only a 'watching brief' awarded to sites of future development in Wellingborough, which is the lowest form of protection against areas already recorded by Sites and Monuments, but have not been subject to investigation. The Nene Valley and Chester Farm are by no means the only areas of natural or ancient habitation, which could be incorporated into leisure areas or future employment possibilities.	Issues associated with heritage, recreation, noise/pollution, archaeological remains, sites and monuments will be taken forward as the review progresses.
78	105	Ms Tracy Hogdkins	Barratt Northampton	Senior Planner DLP Planning Consultants	Question 4	In March 2014 Northamptonshire Economic Partnership (LEP) submitted their Strategic Economic Plan (SEP) to the Government. This document seeks a share of the Government's £2bn Local Growth Fund and sets out the LEP's ambitious target to help deliver 80,000 new homes and 70,000 new jobs in Northamptonshire by 2031. The SEP therefore constitutes a significant piece of evidence to support the preparation of the new Local Plan for Wellingborough and should be identified as such.	See comment to DLP Planning consultants.
79	113	Trustee	Trustee	Graduate	Question	As highlighted above it is presently considered that the evidence base	Agreed. A revision of the evidence base is

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		Ecton Estate	Ecton Estate	Planner Fisher German LLP	4	for housing and employment is not up to date and some of the documents presently relied upon are not relevant or up to date taking full account of current relevant market and economic signals. Without up to date objectively assessed evidence based documentation the PBW cannot be considered to be planning positively for development and infrastructure required for the Borough to meet the objectives of the PBW or the policies of the Framework. Without such evidence base the PBW cannot effectively address and/or cater for the scale and types of housing and employment needed in the Borough to meet identified demand over the plan period.	scheduled to take place as the review process progresses.
80	119	Councillor Brian Skittrall	Bozeat Parish Council		Question 4	The flawed documents listed above should be updated to assess the status of Bozeat (and probably other villages) using an up to date evidence base. For Bozeat this should include the results of the Bozeat Village Plan 2008 and, assuming that the process does not start immediately, the Bozeat Village Plan Update 2014 that is currently in preparation.	Issues associated with Villages and Village boundaries will be taken forward as the review progresses.
81	127	Mrs Carol Mundy	Clerk to Great Doddington Parish Council Great Doddington Parish Council		Question 4	Possibly the CBI or CPRE reports cover this area in greater detail.	Noted.
82	136	Mrs Linda Ross	Clerk to Mears Ashby Parish Council Mears Ashby Parish Council		Question 4	Additional Evidence Sources See The CBI report referred to in section 3, http://www.cbi.org.uk/media/2719763/2014_apr_cbi_sme_trends_survey.pdf See The CPRE report covering planning conditions applicable to renewable energy projects ie solar PV systems and wind turbines. Please refer to the review currently being carried out by Nick Boles-Planning Minister, on raising the weight/influence of Village Design Statements which are being produced by small villages where Neighbourhood Plans are not viable.	This evidence will be reviewed as the review progresses.
83	8	Mr Kenneth Bernthal			Question 5	I find it difficult to understand why a plan for a period that has passed is appropriate	The plan period aims to match the same plan period as in the North Northamptonshire Joint Core Strategy. This is the base date that has been used for much of the evidence base.
84	14	Mr George	Chairman Wellingborough		Question 5	Would suggest that any plan should be forward looking and not dated in previous years. 2015-2031 feels better and came follow the principles of the NNJ Core Strategy	See above comments.

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		Shipman	RFC				
85	27	Mrs Esme Cushing			Question 5	Northamptonshire County Council Highways welcomes the opportunity to comment on the Plan for the Borough of Wellingborough. Northamptonshire County Council Highways is supportive of a plan period of 15 years from 2011-2031 to match that of the North Northamptonshire Joint Core Strategy as this is in line with planning guidance.	Noted and welcomed.
86	44	WCS	Wellingborough Civic Society		Question 5	Will need to run to at least 2026	The plan period is anticipated to run until 2031, which will go beyond 2026.
87	34	Mr Colin Staves	Principal Spatial Planner West Northamptonshir e Joint Planning Unit		Question 5	We fully understand why the Council would choose a plan period to match that of the North Northamptonshire Joint Core Strategy. It is noted however that the Plan for Wellingborough would not be adopted until 2017, which is short of the 15 year time horizon sought by the NPPF. Whilst the NPPF does not express this as an absolute requirement our experience suggests that any Plan which falls short of the recommended time horizon is likely to be challenged. For this reason the possibility of extending the plan period should be fully considered.	This issue will require detailed discussion as the plan progresses, alongside other issues raised.
88	57	Bovis & SCLG	Bovis Homes Ltd & Stanton Cross Land Owners Group	Define	Question 5	It is important that The Plan's timeframe matches the NNJCS's plan period. There also needs to be a clear mechanism for its future review, should the NPPF evolve further over time and/or the NNJCS is subject to a further review.	Noted.
89	63	Geoff Taylor	Cyclists Touring Club		Question 5	Yes	Noted.
90	71	Geoff Taylor			Question 5	Yes	Noted.
91	74	Heather Webb	Natural Development Officer Nene Valley Nature Improvement Area (NIA)		Question 5	Yes	Noted.
92	76	Matthew Stock	Redrow Homes	Senior Planner Pegasus Planning Group	Question 5	The proposed plan period of 2011-2031, to match the North Northamptonshire Joint Core Strategy, is considered to be appropriate (Question 5). However, the Borough Council must be confident that the plan can be adopted prior to 2016 to ensure that it covers the recommended 15-year time frame (paragraph 157 of the NPPF). The Plan must seek to ensure that all of its policies and allocations are clear, flexible and meet fully the objectively assessed housing needs of	Noted. These issues will be taken forward as the review progresses.

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						the district regardless of any Neighbourhood Plans that may come forward. This includes a review of sites, such as Land off Station Road, Earls Barton, which are deliverable in the short term to meet a critical lack of housing in the Borough.	
93	84		Bletsoe Brown and Sywell Aerodrome Ltd	Partner Marrons Shakespeares	Question 5	Yes although the plan period should have a full 15 year horizon and as such the current 2031 horizon date may need to be reviewed if the preparation of the plan became prolonged or delayed for any reason.	Noted. These issues will be taken forward as the review progresses.
94	98		Hampton Brook Ltd	Senior Planner DLP Planning Consultants	Question 5	<p>We agree it is a sensible approach for the plan period of the Local Plan to align with that of the reviewed North Northamptonshire Joint Core Strategy. This is in accordance with paragraph 157 of the Framework which requires Local Plans to be drawn up over an appropriate time scale, preferably a 15 year time horizon. As the anticipated date of adoption of the Plan is 2017, it will need to acknowledge and meet any needs arising over the period 2011-2017 (and equally any delivery over this period).</p> <p>Most significantly within paragraph 157 is the requirement that plans should also be kept up-to-date. This must be a key consideration for the Council looking forward.</p>	Noted. These issues will be taken forward as the review progresses.
95	106	Ms Tracy Hogdkins	Barratt Northampton	Senior Planner DLP Planning Consultants	Question 5	<p>We agree it is sensible approach for the plan period of the Local Plan to align with that of the reviewed North Northamptonshire Joint Core Strategy. This is in accordance with paragraph 157 of the Framework which requires Local Plans to be drawn up over an appropriate time scale, preferably a 15 year time horizon. As the anticipated date of adoption of the Plan is 2017, it will need to acknowledge and meet any needs arising over the period 2011-2017 (and equally any delivery over this period).</p> <p>Most significantly within paragraph 157 is the requirement that plans should also be kept up-to-date. This must be a key consideration for the Council looking forward.</p>	See response above.
96	114	Trustee Ecton Estate	Trustee Ecton Estate	Graduate Planner Fisher German LLP	Question 5	The proposed plan period is appropriate, although the plan period should have a full 15 year horizon and as such the current 2031 end date may need to be reviewed if the preparation of the plan became prolonged or delayed.	Noted. These issues will be taken forward as the review progresses.
97	120	Councillor Brian Skittrall	Bozeat Parish Council		Question 5	<p>It is important to have a long term vision for the Borough and a 20 year plan period will be an important expression of such a vision. However it is unrealistic to expect that within a 20 year period there will not be any substantial macro-economic events or other external factors that would significantly affect a detailed plan that covers such an extended period.</p> <p>It is entirely appropriate that the plan should express the long term vision for the Borough over a 20 year period, but it is equally important that the plan should be sufficiently flexible to be able to react to significant changes that would require changes in detailed policies. The</p>	Comments noted and welcomed.

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						<p>plan should therefore clearly express the vision for the Borough over the plan period but anticipate that detailed policies may require review before the end of the plan period. It may be wise to schedule periodic reviews and updates during the plan period.</p> <p>It is also important that the plan should acknowledge that unforeseen issues will arise over the plan period and make precautionary provision against any adverse impacts that may be caused by them to ensure that they do not receive planning permission by default. One possible example is that the effects of climate change could introduce unpredictable considerations that must be accommodated over the plan period.</p>	
98	132	Mr Paul Lewin	Planning Policy and Heritage Manager Northampton Borough Council		Question 5	<p>It is understood why the Wellingborough Local Plan would follow a similar timescale to that proposed for the amended Joint Core Strategy. Realistically any amendment outside this timescale is unlikely to support a speedier adoption of the Plan; not allocating sufficient sites to meet higher level plan identified needs will be inconsistent with the policies of the NPPF and is likely to be challenged. Going beyond the JCS Plan period means more strategic issues such as longer term objectively assessed needs will require suitable evidence base. It will also necessitate an understanding of how these needs will be reconciled with the wider strategies for North Northamptonshire and West Northamptonshire. Notwithstanding this, the delays in the review of the North Northamptonshire Joint Core Strategy mean that at point of adoption there is a risk that the Plan will not identify 15 years' objectively assessed housing needs. Whilst NPPF appears to allow some flexibility on this issue, consideration needs to be given in relation to both plans as to whether the 2031 timescale is now the most appropriate to pursue.</p>	Noted. These issues will be taken forward as the review progresses.
99	128	Mrs Carol Mundy	Clerk to Great Doddington Parish Council Great Doddington Parish Council		Question 5	No Comment	Noted.
100	137	Mrs Linda Ross	Clerk to Mears Ashby Parish Council Mears Ashby Parish Council		Question 5	<p>The date "span" is seriously challenged, eg how can strategic plans be set up retrospectively? Considering any project coming forward now, on what basis will it be assessed? That is, would the obsolescent plan or the 'Emerging' but yet to be adopted plan be used?</p>	The plan period aims to match the same plan period as in the North Northamptonshire Joint Core Strategy. This is the base date that has been used for much of the evidence base. The plan will be forward looking to 2031.
101	2	Mrs Nikki Daft	Clerk Irchester Parish Council		Question 6	<p>The Irchester parish councillors felt that the consultation was complex and would have preferred a document that was more easily readable and presentable. They would also like confirmation that the Neighbourhood plan document would be a statutory inclusion.</p>	Noted. The Neighbourhood Plan follows a different adoption process but is required to be in general conformity with the strategic policies of the Local Plan. It is likely that the Local Plan will set out the relationship between it and the Neighbourhood Plan. Once adopted, they will all form part of the statutory development plan for

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							the area.
102	3	Mr Max Hand	Albany House Medical Centre		Question 6	<p>Whilst being supportive of the need for and benefits of town centre regeneration, Albany House Medical Centre would like to make 3 observations (bearing in mind that Albany House is now the only medical practice located in centre of town):</p> <p>1) We trust that the needs of our elderly, disabled, families for easy access to Albany House will be considered. Parking close to the practice is already an issue with time-limited parking in Queen Street. The development of the old DWP building next door, while welcome in removing an eyesore, is likely further to increase pressure on parking and access.</p> <p>2) On-road parking is limited; many patients park in the public car park off the High Street, we would hope that there would not be any reduction in the number of spaces made available. Given that the town is growing we would advocate a modest increase.</p> <p>3) Consideration must be given to ensuring access for emergency services at all times (emergency ambulances are regular visitors) and for easy access for clinical/medical staff needing short-term parking in between visiting patients.</p> <p>Albany House is only viable as a medical centre with a large number of patients (we currently have over 16,000 and are the largest practice in the town). If access is made more difficult and patients start to choose to register elsewhere, the practice would cease to be financially viable and would have to relocate most probably to a location well off the town centre. For our patients without their own transport - especially the elderly and disabled, this would represent a serious disadvantage.</p>	<p>Evidence in relation to Wellingborough Town Centre's existing car parking provision will form part of the review process, in terms of car parks. Transportation issues will be reviewed within the context of the Northamptonshire Transportation Strategy 2012 and daughter documents.</p> <p>The Local Plan will seek to ensure that the needs to elderly, disabled, and families will be taken into account during the plan making process.</p>
103	4	Mr J G Smith			Question 6	<p>Thank you for the Consultation Plan of Wellingborough. In 15 years time I shall be over ninety years of age so I don't think it will affect me greatly. In my opinion Wellingborough has had its day. If I compare the town to what it was when I was young, it is very upsetting. In the 1950s and 60s we had a marvellous town, every shop you could wish for, a <u>MARKET</u>, four <u>CINEMAS</u> and it was <u>CLEAN</u>. Wellingborough started to decline when the magnificent Regal Cinema was demolished, then the same with the Lyric Cinema/Theatre and all the shops on the same side on Midland Road. We have <u>so many</u> empty shops and derelict buildings. I have spoken in the past to Mr John Casserly about certain derelict shops, one in Cambridge (Saxbys old shop) and several in Victoria Road belonging to a man who lives in a derelict looking house and garden in the Avenue. I have spoken to Paul Bell recently about the Victoria School, the Drill Hall and how dirty the town is but he wasn't interested. The rubbish in the town and streets leading to it is there for weeks. What is going to happen to Victoria School, the Drill Hall and to the Old Post Office in Midland Road? and many others</p>	<p>The issue of empty shops and the re-use of buildings will be taken forward as the review progresses.</p>

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104	9	Mr Antony Stevens		Jennifer Lampert Associates	Question 6	<p>Regarding the draft review of the Local Plan that is now placed out on consultation with an invitation to make comments.</p> <p>My comments are made on behalf of Mr Anthony Stevens of 58 Hardwick Road Wellingborough.</p> <p>I refer you to the representations already made on 22nd August 2013 in respect of this land and to my objections to allocation of the designation of Environmentally Important Open Space to this land, at that time.</p> <p>This land is not an important open space but it is a private garden, and it has always been used as a garden. The allocation should not have been placed on the land in the first place and it should not be continued. The land is now seen in relation to the group of the residential properties numbered 54, 56, 58, Brookwell and no 60 Hardwick Road.</p> <p>The land plays no important community role and has no public access. It has no environmentally important function.</p> <p>The proposals map bears no relation to the existing character or appearance at the site nor to the changes in circumstances that have occurred over the past few years. The base map used for the proposals map is inaccurate.</p> <p>All of the land owned by my client and his family enjoys permitted development rights as garden land and I request that the designation is removed from that land and it is not continued to be referred to in that way.</p> <p>Objection is thus formally made to the designation of this area of garden as environmentally important open space and its being subject to policy G19 of the revised plan.</p> <p>I look forward to receiving confirmation that this change will be made before the plan progresses to Inquiry.</p>	<p>Noted.</p> <p>The current consultation relates to the scope of the plan, and doesn't relate to site specific proposals at this time.</p> <p>This issue will be considered as the review progresses.</p>
105	10		The Garden Centre Group	Gregory Gray Associates	Question 6	<p>Gregory Gray Associates is instructed by The Garden Centre Group, owners of Wellingborough Garden Centre, to make representations in respect of the above consultation which seeks views on the proposed scope of the above Plan.</p> <p>The Plan for the Borough of Wellingborough will sit alongside the North Northamptonshire Joint Core Strategy which will set out the strategic policies for the area and generic development management policies. The Core Strategy has yet to be adopted however seeks to identify objectively assessed housing and economic needs for the area and allocate strategic sites to deliver these. The Wellingborough Plan will therefore identify smaller sites also needed to deliver this level of housing and jobs and where necessary will include policies to set out how those sites should be developed.</p> <p>Whilst the Wellingborough Plan will not reiterate policies from the NPPF</p>	<p>Noted.</p> <p>Noted.</p>

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						<p>or emerging Joint Core Strategy, it clearly needs to reflect the principles contained within these documents in both identifying non-strategic sites for development and drawing up policies that will guide future development on both allocated and non-allocated sites. In this respect particular attention is drawn to two issues: the re-use of previously developed sites and support for the rural economy.</p> <p>Previously Developed Land</p> <p>The NPPF identifies as one of the core planning principles the need to <i>"encourage the effective use of land that has been previously developed (brownfield land), provided that it is not of high environmental value"</i>. This encouragement applies equally to urban and to rural sites.</p> <p>The emerging JCS seeks 'a stronger recognition of the importance of the natural environment' whilst seeking to identify sufficient sites to meet a growth in housing and economic development needs. In order to resolve these two, potentially conflicting, objectives it is necessary to prioritise the re-use of brownfield sites in the rural area in order to meet these development needs whilst maintaining the rural character of currently undeveloped areas of countryside.</p> <p>This approach should be reflected in both the non-strategic allocations proposed within the Plan and also in development management policies which would guide future development on both allocated and non-allocated sites.</p> <p>Our client's site, Wellingborough Garden Centre, extends 2.01ha and comprises previously developed land with a total sales area amounting to approximately 3,975 sq.m. It is shown edged red on the attached site plan.</p> <p>The site abuts the settlement boundary which extends the village of Great Doddington to the north-east along Millers Lane. It is considered that the site's location and previously developed nature renders it suitable for housing as an extension to the existing village. Alternatively it could be used to provide a suitable employment, food/non-food retail, hotel or leisure site in accordance with the development needs of the local area.</p> <p>The site could be made available for re-development in the short-term (1 - 5 years) and there are no known issues that would affect its viability and therefore its deliverability. Accordingly, it is requested that Wellingborough Garden Centre be identified for future development within the emerging Plan for the Borough of Wellingborough.</p> <p>It is further requested that the Plan include a policy which would allow for the future re-development of such sites in accordance with national policy. A suggested wording for such a policy could be:</p>	<p>Noted.</p> <p>Noted.</p> <p>Details associated with this site will receive consideration as the review progresses.</p>

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						<p><i>Policy - Previously Developed Sites within the Countryside</i></p> <p><i>The re-development of existing previously developed (brownfield) sites within the countryside will be permitted where it is demonstrated that the new development will not have a materially greater impact upon the character and amenities of the countryside than the existing use, having regard to the scale, bulk, massing, spread and intensity of the new use and subject to other relevant policies within the Plan.</i></p> <p>Supporting a Prosperous Rural Economy</p> <p>Para. 28 of the NPPF indicates that:</p> <p><i>"To promote a strong rural economy, local and neighbourhood plans should:</i></p> <ul style="list-style-type: none"> <i>Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings"</i> <p>Existing rural businesses, such as our clients, make a significant contribution to the rural economy both as a result of the employment they offer and as a result of their support for local suppliers. Their sustainable expansion should be supported by appropriately worded policies within the Plan and the Council are requested to ensure that the Wellingborough Plan addresses this issue.</p>	
106	11	Sandra Stevens			Question 6	<p>I am in receipt of the letter concerning plan consultation list and am disappointed to note that even though I contested the previous plans which show my garden as IOS land and told that this would be changed when the next plans came up for renewal, nothing has altered.</p> <p>I have no objection to you wanting to show part of my garden land as IOS but I do want it to be confirmed that this land is in fact my garden. I also note that the plan has gone through as it was before and does not even show the new built houses which are currently there.</p>	This consultation relates to the scope of the plan, and does not contain details of site boundaries. This issue can be revisited at a later stage of the plan making process when more detail is developed.
107	15	Mr George Shipman	Chairman Wellingborough RFC		Question 6	<p>WRFC are grateful of the opportunity to comment on what will be an important piece of work for the borough.</p> <p>If increasing local participation in sport is to remain an objective for local authorities, community rugby clubs we believe should not just be about playing the game of rugby. We believe they should develop and maintain a full complement of youth sides from 6-15 years, run youth academy's up to Under 18, operate girls and ladies sides plus senior men's sides. This requires access to a training pitch plus a minimum of 3 pitches, with match and training floodlight provision, plus qualified coaches, safeguarding officer etc and the rugby club should be an 'RFU Accredited Club' to ensure minimum standards are achieved and maintained. When one looks to other local authorities similar to Wellingborough, they appear to sustain one successful club. (Kettering, Market Harborough, Huntingdon, Olney as examples) Whilst acknowledging that Wellingborough will increase in size and population</p>	<p>Noted.</p> <p>The review of the Local Plan will include a review of pitch provision, and these issues will be considered in more detail at later stages in the plan making process.</p>

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						<p>and that a number of the new residents will wish to participate in the sport of rugby union, we believe it is not sustainable to seek 2/3 rugby clubs for the area.</p> <p>Access to 3G or appropriate 'inside training areas' is necessary during the winter months. During the past 2 seasons (2012/2014) the club have paid to travel to and use facilities at Northampton. We agree with the reference that if a rugby club was sited within new premises as mentioned in the existing plan, that the long term management should be undertaken by the club and its members.</p> <p>WRFC is engaging with an "All Sports Partnership" with two local schools and the RFU (East Midlands Rugby Development Officer) We believe that it benefits the sport of rugby, local scholls and the wider communtiy for this sort of collaborative working</p> <p>We would be keen to enter into discussion into potentially partnering around either an appropriate sports hub or proposed sports village. Our current location borders with the 'sports village initial site option 23'. Whilst we note that this and site 24 were seen as 'least favoured options', we would note that the town centre has the relatively recent Weandel leisure Centre and the north of the existing town Redwell Leisure Centre and Weavers to the west.</p>	
108	18	Rose Freeman	Planning Policy Officer The Theatres Trust		Question 6	<p>Generally, for the purposes of sustainable development, the 'default' position should be to retain and improve, this being the most sustainable option. All your development policies should therefore begin with the assumption to protect and enhance before moving onto criteria for new development. It is simply better in sustainability terms to use and recycle old buildings than to demolish them and to build new ones.</p> <p>We also draw your attention to item 156 of the NPPF which states that local planning authorities should set out the strategic priorities for their area including policies to deliver the provision of health, security, community and cultural infrastructure and other local facilities.</p>	This issue will be taken forward for consideration as the review progresses.
109	20	Mr Stephen Borrett	Vice Chair Wilby Parish Council		Question 6	<p>We note that one of the contents of the Plan will include " <i>Village settlement boundaries for those villages not undertaking a Neighbourhood Plan</i>". It was explained at the recent Parishes Forum held at Swanspool that this would involve liaison with individual Parishes so affected to review existing Parish boundaries to ensure these are still appropriate. As Wilby is not involved in any Neighbourhood Plan, we await this formal consultation with interest.</p>	Noted and welcomed.
110	21	Mr Antony Stevens			Question 6	<p>I have studied the drawing for the designation and you have used an old OS map. Please could you use the new layout of the area to the rear of what used to be 58 Hardwick Road and now is 54/56/58 and 58A Hardwick Road as I believe this will give a different bearing to the suggested area of importance to the local community. The area you have designated as important open space is the rear garden to all of</p>	The scope of the current consultation related only to the overall scope of the plan. However, the details of this representation will be taken forward for consideration at a later stage of the plan process.

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						these properties and has always been garden land to number 58(Brookwell) Hardwick Road. On numerous occasions myself and my Mother and now our solicitor has requested that you remove the designation as it should not have been placed over our back garden in the first place. We had been informed that it couldn't be changed until the consultation had been heard and we now find you have changed nothing and that you are working from a plan of Wellingborough that no longer exists. I will attach a current drawing that shows the area as it is currently. I will email over a copy drawing of the area as is.	
111	45	WCS	Wellingborough Civic Society		Question 6	We would like to see the maximum involvement of young persons in the process of plan preparation. There is considerable scope for consulting the young through organised events, visiting schools, attending youth organisations and other events. This Plan is designed to meet their future needs (i.e. at the end date) and it is important that they feel able to take ownership of what it proposes.	The Council is supportive of this principle in general and efforts will be made to involve young people, within the framework of existing resources.
112	30	Ms Shelly Lawrence-Harris			Question 6	<p>We have endeavoured to access this information as we do not have broadband at home it is very difficult. We went to the tithe barn and with the help of an IT engineer we eventually managed to access it. The opportunity to divulge and study such a large document was hampered by the fact we could not print off items of interest for reference and study carefully at home for consideration. Additionally the noise and pedestrian traffic in the tithe barn made you feel that you was taking up resources and peoples time unfairly. In the respect that WBC feel that the information is accessible to the public in this format our scenario, I hope, paints an entirely different picture.</p> <p>As public consultation, participation and democracy is I'm sure at the centre of WBC ethics and code of practice could we suggest a few ideas that would help tremendously towards <u>full</u> participation.</p> <p>A hard copy <u>intact</u> at a library (I know this involves paper resources but a lot of people prefer this format and are more likely to get involved). A CD version that we can take home (we don't mind a small financial charge) so that we can peruse and consider the plan at home.</p> <p>We cannot afford Broadband at home however we have been actively involved in the past; especially with the Core Spatial Strategy and JPU meetings. At a meeting with local residents regarding this document discussion disclosed that we all found the internet link difficult to access. This is an issue for local democracy!</p> <p>We look forward to your kind response.</p> <p>P.S. We went to Swanspool to look at the hard copy, it was five sheets long - 200 sheets short!!</p>	<p>The document the subject of this consultation was only looking at the general topics that should be included in the plan; it was only 12 pages long.</p> <p>Paper copies were made available at the Swanspool reception and in all libraries in the borough.</p>
113	37	Mark	Historic		Question	Site Allocations	Further discussion welcomed. These issues will

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		White	Environment Planning Advisor English Heritage		6	<p>It will be essential that historic environment considerations are properly assessed and addressed in identifying potential site allocations for development. It is noted that the Wellingborough Plan will identify smaller sites needed in addition to strategic sites to deliver the level of development needed to meet the requirements of the Core Strategy.</p> <p>Potential site allocations may fall within, contain, or are adjacent to a number of designated and non-designated heritage assets including listed buildings, conservation areas and archaeology. A robust methodology for assessment is therefore required. Future published site options and preferred allocations should identify site designations and constraints, including heritage assets. The evidence base is key here to informing future site selection in terms of identification of existing and potential historic environment attributes. In addition, the possible cumulative impacts of a number of site allocations in one location could cause significant harm to the historic landscape/townscape and should be fully considered.</p> <p>We are also keen that the preferred sites, when identified, include development criteria to guide future proposals, which in some cases should include reference to the historic environment. There is a danger of allocating sites without such criteria and establishing the principle of development without guidance on the issues that need to be addressed at the planning application stage. Design criteria for key allocations can also be essential in terms of responding to local character, identity, distinctiveness and sense of place. Consideration should also be given through the site allocation process to opportunities for significance of heritage assets to be better revealed or enhanced as part of the site allocation process, in accordance with the NPPF.</p> <p>In relation to designations, paragraph 157 of the NPPF states that local plans should identify land where development would be inappropriate, for instance because of its environmental or historic significance. You may therefore wish to consider designation of such areas, where your evidence suggests this is appropriate.</p> <p>Other such designations you may wish to consider include green/open spaces, specific uses, key views or vistas and landscapes.</p>	be taken forward as the review progresses.
114	39	Bedford Borough Council	Bedford Borough Council		Question 6	<p>Thank you for consulting Bedford Borough Council, as Local Planning Authority, on the first stage of the Plan for the Borough of Wellingborough. It is noted that this plan is being prepared in accordance with the North Northamptonshire Joint Core Strategy, to which comments were made on 27th September 2012.</p> <p>In accordance with the duty to cooperate, my Council is interested in engaging with aspects of this plan that may have cross-boundary impacts. In the comments to the North Northamptonshire Joint Core Strategy consultation, we highlighted the potential for the re-designation of Rushden as a growth town and any subsequent growth to have an effect on traffic movements on the A6. Putting in place a clear strategy</p>	Noted. Further discussion welcomed.

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						<p>associated with this potential growth was requested so as to "lead to improved transport choices and linkages with Bedford" (please see previous comments for full response to the NNJCS consultation). We acknowledge that the Plan for the Borough of Wellingborough will allocate sites to contribute to the housing target that the NNJCS will provide and as part of this consultation, we would like to re-iterate the need for clear strategies to be put in place to address the impact any site allocated would potentially have on infrastructure across the boundaries between the two councils.</p> <p>We look forward to engaging with you in regard to these issues so as to fulfil the duty to cooperate. If there are any comments or queries regarding this response, please do not hesitate to contact the planning policy team at planningpolicy@bedford.gov.uk.</p>	
115	64	Geoff Taylor	Cyclists Touring Club		Question 6	If Borough & County Councils are serious about increasing cycle usage it's important that they engage more fully with the local cycling community, both as part of this Plan, and more routinely to understand their requirements and concerns, and how Councils' present culture, practice and procedures could be improved.	Comments noted and further discussion welcomed.
116	72	Geoff Taylor			Question 6	No. Thank you for the opportunity to contribute!	Noted and welcomed.
117	75	Heather Webb	Natural Development Officer Nene Valley Nature Improvement Area (NIA)		Question 6	<p>I would like to see two of the existing Local Plan Saved Policies brought forward into the new Local Plan. These are:</p> <ul style="list-style-type: none"> G18 regarding Sites of Nature Conservation Value: this is an excellent policy and more prescriptive than those in the emerging Joint Core Strategy (JCS). While the consultation document states that biodiversity will not be addressed in the Local Plan because it is included in the JCS, policy G18 provides much needed detail. I feel therefore that it would be appropriate to include it in the new Local Plan. L7 regarding access to the linear park system is locally distinctive and remains relevant given the local deficiencies in accessible natural greenspace. 	These issues will be taken forward as the review progresses.
118	80	Matthew Stock	Redrow Homes	Senior Planner Pegasus Planning Group	Question 6	Redrow trust that the Local Plan will endeavour to meet one of the Core Planning Principles of the NPPF to proactively drive and support sustainable economic development to deliver the homes, employment and thriving local places that the country needs, through making every effort to identify and meet the housing, business and other needs of an area and respond positively to opportunities for growth. As such, the desire to produce a plan of this nature is cautiously welcomed and it is hoped that the plan will progress in a timely, positive and proactive manner to deliver a clear and coherent vision for the whole of the Borough.	Noted and welcomed.

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119	85		Bletsoe Brown and Sywell Aerodrome Ltd	Partner Marrons Shakespeares	Question 6	<p>My client would very much appreciate the opportunity to meet with you to discuss this representation, and how this issue can be taken forward through the plan process within your current timetable.</p> <p>Should you wish to discuss the content of this representation or wish to engage with Marrons Shakespeares further at this stage, please do not hesitate to contact John Edmond (Marrons Shakespeares) or Gary Stephens (Marrons Planning). Please acknowledge safe receipt of this representation.</p>	Noted. Further discussion welcomed.
120	99		Hampton Brook Ltd	Senior Planner DLP Planning Consultants	Question 6	<p>See additional representations attached.</p> <p>Hampton Brook Ltd has a number of interests in the Borough of Wellingborough. Delivery of these assets would assist the Council in meeting its objectively assessed needs for housing and/or employment growth.</p> <p>The sites the company wishes to promote at this stage for inclusion in the emerging Local Plan are as follows:</p> <ul style="list-style-type: none"> • Prospect Park, Wilby Way (Mixed Use) • Northampton Road, Wellingborough (Residential) • Top Farm, Great Doddington (Residential) • Land off Windsor Road, Wellingborough (Residential) <p>These representations should be read in conjunction with the detailed information submitted by DLP Planning Consultants on behalf of Hampton Brook Ltd in October 2013 in respect of Part B of the North Northants JPU Draft Interim Housing Policy Statement (IHS).</p>	Further discussions on these sites are welcomed as further detail of the review process emerges.
121	107	Ms Tracy Hogdkins	Barratt Northampton	Senior Planner DLP Planning Consultants	Question 6	See additional representations regarding Land at Niort Way	Noted.
122	109	Mr Craig Barnes	Graduate Planner Gladman Developments		Question 6	<p>The Plan for the Borough of Wellingborough will sit alongside the emerging strategic policies for the area in the North Northamptonshire Joint Core Strategy review, forming a complementary role. The plan will identify smaller sites that are required to deliver the level of housing needed in Wellingborough, and where necessary will include policies to set out how those sites should be developed.</p> <p>The current consultation is the first stage in preparing the Local Plan for the district. Gladman thank the Council for the opportunity to comment on this document at this early stage and look forward to commenting on a further draft of the Council's Local Plan in the future.</p>	Noted. Noted.

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						<p>The key points highlighted by Gladman in this representation are;</p> <ul style="list-style-type: none"> • The submission of the Local Plan for examination must take place following the conclusion of the examination of the North Northamptonshire Joint Core Strategy (NNJCS). • The Local Plan must not assume the level of growth planned by the NNJCS ahead of the Joint Core Strategies (JCS) examination. This includes applying the interim housing figure beyond that of decision making purposes in the short term. • Current deliverability issues faced by SUE's in Wellingborough require a policy response through the allocation of small sites by both the JCS and the Wellingborough Local Plan. • The development plan must seek to meet the identified objective assessed needs of the authority in accordance with §14 of the Framework. The fulfilment of the housing requirement by neighbouring authorities should be considered as a last resort. • The provision of non-strategic sites would promote the deliverability of the housing requirement through a wider market choice. • The JCS and Wellingborough Plan must recognise the capacity, role and function of rural settlements to accommodate the boroughs housing needs. <p>Against this context, Gladman submit Land at Easton Lane, Bozeat to the Council (see Figure 1 - in attachments), for consideration as an allocation for housing through the local plan process.</p>	<p>These issues will be taken forward to a later stage of the review process.</p> <p>This site will be taken forward for consideration as the review progresses.</p>
123	115	Trustee Ecton Estate	Trustee Ecton Estate	Graduate Planner Fisher German LLP	Question 6	See attached (promotion land - west of Ecton)	This site will be taken forward for consideration as the review progresses.
124	129	Mrs Carol Mundy	Clerk to Great Doddington Parish Council Great Doddington Parish Council		Question 6	No reference to localism is made. Similarly what boundaries might change and when and under what circumstances. Currently the Gt. Doddington Village envelope is totally full and there is no space to allow any additional properties.	Any alterations to village boundaries would be subject to consultation as further details of the review are developed. These comments will form part of that consideration at that time.
125	138	Mrs Linda Ross	Clerk to Mears Ashby Parish Council Mears Ashby Parish Council		Question 6	<p>Much of the evidence presented is long out of date and thus reflects an economic climate pre the 2007 recession.</p> <p>Forecasting through the period to 2031 must incorporate much "speculation" with added imponderables such as EU membership making any realistic assessment of market forces up to 13 years hence next to impossible!</p> <p>The concept of "Localism" is clearly swept aside when the North Northamptonshire project is a central government led project for a</p>	<p>Agreed.</p> <p>Periodic reviews are anticipated to alleviate the difficulties or long term economic changes.</p> <p>The North Northamptonshire Joint Core Strategy is currently in the process of being reviewed with local needs being adjusted as part of this</p>

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						<p>development that significantly exceeds the true local needs!</p> <p>Reference is made to the validity of existing boundaries. What boundaries might change, when and under what circumstances?</p> <p>Can we take it that changes to "Site Specific" specifications will be the subject of further consultation?</p> <p>For your information we believe that this Parish will deliver a minimum of twenty houses by 2020. This being on a "pro rata" basis in excess of our share of The North Northamptonshire project.</p> <p>Our local experience tells us that the current facility whereby applicants can pursue planning approval retrospectively creates conformity problems. Could this facility be withdrawn?</p>	<p>process.</p> <p>Any changes to village policy lines, or any site specific proposals will be subject to consultation at later stages in the process.</p> <p>Any site specific proposals will be subjected to public consultation. Any new consultation event will be publicised via Limehouse and the Council's website.</p> <p>This comment is noted.</p> <p>Unfortunately alterations to National Planning law which would remove the ability to apply for planning permission retrospectively would not be within the remit of this Local Plan Review.</p>
126	121	Councillor Brian Skittrall	Bozeat Parish Council		Question 6	<p>It is important to have a long term vision for the Borough and a 20 year plan period will be an important expression of such a vision. However it is unrealistic to expect that within a 20 year period there will not be any substantial macro-economic events or other external factors that would significantly affect a detailed plan that covers such an extended period.</p> <p>It is entirely appropriate that the plan should express the long term vision for the Borough over a 20 year period, but it is equally important that the plan should be sufficiently flexible to be able to react to significant changes that would require changes in detailed policies. The plan should therefore clearly express the vision for the Borough over the plan period but anticipate that detailed policies may require review before the end of the plan period. It may be wise to schedule periodic reviews and updates during the plan period.</p> <p>It is also important that the plan should acknowledge that unforeseen issues will arise over the plan period and make precautionary provision against any adverse impacts that may be caused by them to ensure that they do not receive planning permission by default. One possible example is that the effects of climate change could introduce</p>	<p>Agreed. Within that time frame reviews of the plan are anticipated to take account of macro-economic events, or environmental change and other relevant factors.</p> <p>Agreed, see comments above.</p> <p>Agreed, see comments above.</p>

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						unpredictable considerations that must be accommodated over the plan period.	
127	122	Councillor Brian Skittrall	Bozeat Parish Council		Question 6	<p>It is important that the Plan restricts itself to specific concerns and does not include non-specific support for perceived "good things" about which it has no evidence of need or detailed knowledge of possible harms that could result from schemes that may claim to provide the anticipated "good". Good intentions expressed in planning documents can result in harmful or even wholly inappropriate schemes gaining planning approval without proper scrutiny.</p> <p>It is important that the correct relationship is established between the NNJCS and the Plan. Detail from the NNJCS should not be unnecessarily repeated in the Plan making it necessary to update both documents in the event of a change. On the other hand the Plan should not rely upon the NNJCS if a particular detail is important to the Plan.</p>	Agreed.
128	139	Mrs Julie Friell	Hardwick Parish Council		Question 6	<p>The Government's overarching statement of objectives for the planning system 1) makes clear:</p> <p>"Planning shapes the places where people live and work and the country we live in.</p> <p>Good planning ensures that we get the right development in the right place, at the right time. It makes a positive difference to people's lives and helps to deliver homes, jobs, and better opportunities for all, <u>whilst protecting and enhancing the natural and historic environment, and conserving the countryside and open spaces that are vital resources for everyone</u>"</p> <p>In the above we have underlined the salient sentences in relation to small conservations villages as Hardwick, and it is on this background that we comment on the planning paper.</p> <p>It is important that the new plan for Wellingborough is citizen focused, fair, transparent and final.</p> <p>Citizen Focus. Consultation with local communities, villages and parishes, small and big, throughout the process is paramount. It is therefore important that the plan includes some milestone and timeframes for this involvement. This involvement should include a commitment for frequent updates of the time table and requests to local communities for comments to any planned development which impacts on their society. Apart from point 6, which mention a minimum six week period for consultation, there are no other specific action planned for communication with the public about the plan</p> <p>Fairness The plan has to be fair, meaning that is has to live up to the abovementioned Government statement regarding planning. The fairness also includes the fact that local planners need to make efforts to clear the various documents for planning jargon, which is difficult for</p>	<p>Noted.</p> <p>Agreed. All stages of the plan will be published on the Council's website for the public to comment upon.</p> <p>Agreed.</p> <p>All stages of the plan will be published on the Council's website for the public to comment</p>

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						<p>laymen to understand.</p> <p>Transparency The draft plan and subsequent changes to the plan has to be communicated to the impacted communities during the planning process. It is a basic democratic right for citizens in the Borough that information is provided and full transparency is preserved. Nothing less. And if this is not achieved, say through sloppy communication, the plan is not credible.</p> <p>A Final Plan has to be trusted When the Appleby Lodge Warehouse development was applied for in 2012 the overall plan in force for the area was The North Northamptonshire Joint Core Strategy of 2008. However in 2012 after Prologis PLC had worked with BCW on their plans for some time an extension to the 2008 plan emerged: "North Northamptonshire Joint Core Strategy 2011-1031 - Emerging Draft for Consultation August 2012", which included change to the usage of Appleby Lodge Farm.</p> <p>It has to be noted that this document in April 2014 is still only in draft form, and we have been told by BCW, that it will stay that way until approval/rejection of the Rushden Lakes Development has taken place. This development was likewise not included in the North Northamptonshire Joint Core Strategy of 2008.</p> <p>For citizens and local communities this is a very worrying development and in many ways undemocratic, as citizens are left in limbo as relates to the planning rules in the county. This situation cannot be allowed to continue. Any plan has to be agreed and final, so that the communities know exactly what the rules are. The efforts associated with developing a new plan is wasted, and the result useless, if the final product cannot be trusted. It is as simple as that.</p> <p>You ask whether a plan period up to 2031 is appropriate. We don't think so, as any new plan needs updating being subject to changes if required, so why not make it a plan from 2015 to 2025, ie for ten years from adoption. To call it 2011 to 2031 does not make sense as adoption will happen 4 years after its start.</p>	<p>upon.</p> <p>As above.</p> <p>This relates to the emerging Core Strategy and its various stages of review.</p> <p>The Council cannot prevent planning applications being submitted whilst plans are under review.</p> <p>The plan period start date relates to the JCS and the base date for the evidence.</p>
129	140	Mrs Julie Friell	Hardwick Parish Council			<p>A few technical points</p> <p>Clause 2.1. It is not clear from your document whether the North Northamptonshire Joint Core Strategy (JCS), which is being prepared for adoption in 2015 is the same document as drafted in 2012. Is this also the same document mentioned in clause 4.1 with the title North Northamptonshire Joint Spatial Strategy? This needs clarification.</p>	<p>In August 2012 there was a draft of the JCS as part of the review. This will continue to be reviewed and a further version of the plan will be consulted on in Autumn 2014.</p>

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						<p>The Current Evidence Base does not include the UK Solar PV Strategy (Part 2) as published by the Government in March 2014. This should be included.</p> <p>1) Government Planning Policy Statement 1 Planning and Sustainable Development 2005/07 still in force.</p>	<p>Noted.</p> <p>Noted.</p>