

## Issues and Options Consultation and Officers Response

<b>Issue 1: Duty to Cooperate</b>	
<b>Bearing in mind our ongoing involvement in the preparation of the Joint Core Strategy, which will set the full range of strategic priorities for the borough, are there any other matters that may be dealt with by this part 2 local plan that need to specifically be addressed through the duty to cooperate?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Natural England considers that cross boundary issues concerning the natural environment, for example Green Infrastructure and the protection of the Upper Nene Valley Gravel Pit Special Protection Area (SPA), are being dealt with satisfactorily by the local plan process.</li> <li>• English Heritage (Historic England) is not aware of any cross-boundary issues affecting the historic environment at this stage.</li> <li>• Northampton Borough Council welcomes the reference to the cross boundary issue relating to the potential need to accommodate some of Northampton's growth post 2029 and also welcomes the reference to Wellingborough Council's intent to work with NBC. It is strongly recommended that WBC continues to work with NBC on progressing plan making, not just on housing matters but on other issues including employment, infrastructure needs, retail and green infrastructure.</li> <li>• Persimmon Homes, Miller Homes, Redrow Homes and Northampton Roundhill Ltd have all referred to the issue of the potential growth of Northampton needing to be addressed. Miller Homes are promoting a housing site to</li> </ul>	<p>The council will continue to work with partners and neighbouring authorities on strategic and cross boundary issues.</p> <p>It has been confirmed through the Joint Core Strategy (JCS) that Northampton's growth can be met in the West Northants area up until 2029. For growth beyond this period the Borough Council of Wellingborough and the JPU will work cooperatively to ensure all options for Northampton's future growth are considered. A memorandum of understanding between all partners is being considered.</p>

<p>the east of Northampton and Northampton Roundhill Ltd are requesting a strategic allocation for additional employment uses to be accommodated within Wellingborough in association with the Northampton North SUE.</p> <ul style="list-style-type: none"> <li>The Wellingborough Chamber of Commerce does not think that the current duty to cooperate is particularly effective or workable given that local plans can be at different stages and inherently there is likely to be competition and conflict between neighbouring areas. The only other areas that the Chamber could foresee as being important areas for collaboration would be implications for drainage and flood risk down-stream for the River Nene and River Ise, potential cumulative impacts for the Special Protection Area and issues surrounding the delivery and prioritisation of strategic highway improvements.</li> </ul>	<p>The council will continue to work with partners and neighbouring authorities on strategic and cross boundary issues.</p>
--	---

<p><b>Issue 2: Vision and Outcomes</b></p> <p><b>Should the part 2 local plan contain an additional more locally distinctive vision or any further outcomes to supplement those in the Joint Core Strategy?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Irchester Parish Council and Lt Harrowden Parish Council consider that there is no need for a more locally distinctive vision to supplement the JCS.</li> <li>Natural England considers that a local version of the</li> </ul>	<p>The JCS sets out the strategic vision and outcomes for North Northamptonshire plan area, including Wellingborough. The evidence based studies have been considered and it is felt that this covers all of the implications.</p>

vision would be helpful.

- The Cyclists Touring Club Right to Ride Network considers that outcome 7 'More walkable places and an excellent choice of ways to travel' needs to be fleshed out in more detail to show that measures to encourage cycling will be promoted and will need to address the difficulties of local topography. Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group considers that this point should be a bit more in-depth to cover cycleways, bus routes and access to train stations as well as access for people with mobility issues.
- English Heritage (Historic England) has said that while the draft Vision for the emerging JCS sets out a general vision for the Borough, you may wish to consider if there are any specific outcomes that should be identified in the Local Plan. In terms of the historic environment, this might include the successful implementation of the Chester Farm project and measures to protect and enhance the historic town centre of Wellingborough.
- The Wellingborough Chamber of Commerce believes that the vision articulated within the JCS for Wellingborough and the other growth towns is too inflexible. The Chamber does not believe that there is compelling evidence that major office development will be attracted to Wellingborough even with a redeveloped station which has higher levels of usage. The vision should perhaps be more flexible to accommodate changing social and economic trends.

<b>Issue 3: Presumption in Favour of Sustainable Development</b>	
<b>The Joint Core Strategy (as part 1 of the local plan) has a policy on the presumption in favour of sustainable development. Does part 2 of the local plan need an additional one? If an additional policy is required, what local dimension should it add to the existing policies?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Natural England, The Nene Valley Nature Improvement Area, Wellingborough Chamber of Commerce and local councils consider that the presumption in favour of sustainable development is adequately covered by the JCS and National Planning Policy Framework (NPPF)</li> <li>The Environment Agency also agreed but stated it was happy to provide further advice.</li> </ul>	<p>It is considered that no further policy on presumption in favour of sustainable development is required. The JCS and the NPPF provides an extensive policy context on sustainable development issues for the PBW.</p> <p>Specifically, Policy 1 of the JCS and Paragraph 14 of the NPPF relates to presumption in favour of sustainable development.</p>
<b>Issue 4: Historic Environment</b>	
<b>Are there any other locally specific policies required to protect and enhance Wellingborough's historic assets in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy? If so what should they say? Should policy WTC 12 of the Town Centre Area Action Plan (2009) be refreshed and taken forward into part 2 of the local plan?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Wollaston, Ecton Parish Council, and local residents support conservation area appraisals for the remainder of borough, with a clear timetable. A conservation area boundary review was suggested with a definition of what contributes to special character and sense of place.</li> </ul>	<p>It is considered that the policies sets out in the JCS and the NPPF are adequate to protect and enhance historic assets (designated and non-designated) in the borough, however, policies on shop fronts have been incorporated as suggested by English Heritage (Historic England) and other respondents.</p>

<ul style="list-style-type: none"> <li>• Irchester, Little Irchester and Knuston Neighbourhood Plan Steering Group highlighted the importance of listed buildings and their setting in the landscape.</li> <li>• English Heritage (Historic England) suggested that both designated and non-designated heritage assets should be recognised, protected and, where possible enhanced. They also suggested local evidence is gathered on historic environment/ archaeology to improve the understanding of local character and heritage assets.</li> <li>• Most respondents suggested a specific policy is needed which relates to the restoration of historic building lines, street patterns and shop fronts. However, Bovis Homes Ltd &amp; Stanton Cross Land Owners and Persimmon Homes Midlands considered that additional local policies are not required.</li> </ul>	<p>Borough wide Conservation Area Appraisals will be an on-going work programme outside the scope of the plan. Specific policies on historic environment are set out in Policy 2 and Paragraph 126-141 of the JCS and NPPF respectively.</p>
<p><b>Issue 5: Chester Farm</b>  <b>Is a site specific policy required to guide the future of Chester Farm?</b>  <b>Options</b></p> <p><b>A. No, the area is adequately protected by the existing national and local designations on and around the site and the general policies on the historic and natural environment in the NPPF and the Joint Core Strategy</b></p> <p><b>B. Yes, a site specific policy is required.</b>  <b>If you consider option B to be the most appropriate approach, what should the policy say?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Eight respondents felt Chester Farm needs to be protected and maintained. Three consultees also said they would like pedestrian and cycle access to the site.</li> </ul>	<p>The richness and complexity of the Chester Farm Site is protected through its statutory designation as a Schedule Ancient Monument as well as Grade II and Grade II* listings</p>

<ul style="list-style-type: none"> <li>English Heritage (Historic England) recommends a policy is included on Chester Farm. EH suggested that the council also needs to take this opportunity to address 'heritage at risk' through policy.</li> <li>The Chamber of Commerce suggested building on preferred option 52 from the SSPDPD which referred to developing Chester Farm as a viable tourist attraction.</li> </ul>	<p>across the site. Work on bringing the site back into sustainable, maintained use is being driven by Chester Farm's Heritage Lottery Fund Development Project. The developers of the Development Project have been working closely with the council, particularly the regeneration and conservation team, both of whom are happy with the progress, and there is also on-going pre-application discussion in line with this. Therefore as work is progressing well on developing the site there is no need for a further site specific policy as this would be duplicating work.</p>
<p><b>Issue 6: Landscape Character</b></p> <p><b>Should part 2 of the local plan include any additional locally specific policies on landscape character in addition to policy 3 of the Joint Core Strategy, if so what should they say?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>The majority of respondents suggested no additional local policies on Landscape Character are required as they are adequately covered in the JCS and NPPF.</li> <li>Natural England, the Nene Valley Nature Improvement Area, and one resident suggested that the PBW should include more locally specific policies on landscape character. Natural England suggested a policy to strengthen the sense of place by protecting and enhancing existing hedgerows, woodland, open spaces, and green infrastructure networks.</li> <li>Wellingborough Civic Society and two residents suggested that development should be sensitive to the character and setting of the area.</li> <li>Ecton Parish Council suggested that Ecton requires a local specific policy to protect it due to its special</li> </ul>	<p>It is considered that no further locally specific policy on landscape character is required. The JCS and the NPPF provides an extensive policy context on landscape character issues for the PBW. Policy 3 of the JCS and Paragraph 109-125 of the NPPF provide a detailed policy framework on Landscape Character.</p>

character.

**Issue 7: Biodiversity and Geodiversity**

**Are any locally specific policies required to protect and enhance Wellingborough's biodiversity and geodiversity assets in addition to policy 4 in the Joint Core Strategy and the NPPF? If so what should they say?**

*Summary of Comments Received*

- Wollaston Parish Council suggested that all local wildlife sites should be shown on the proposals map with specific policies in the PBW to secure their protection.
- The Nene Valley Nature Improvement Area supports locally specific policies, in particular to protect the integrity of the Upper Nene Valley Gravel Pits special protection area.
- Natural England considered that the JCS policy on biodiversity and geodiversity is comprehensive, however the PBW could include more detailed or site specific advice.
- Northampton Borough Council suggested that the PBW should take account of the North Northants Supplementary Planning Documents (SPD's) on the nature improvement area on biodiversity, Upper Nene Valley Gravel Pits Special Protection Area (SPA) and Northampton Borough Council Green Infrastructure and Open Space study.
- Francis Jackson Homes, Bovis Homes, Stanton Cross Land Owners Group, Persimmon Homes and Irchester Parish Council consider that biodiversity is adequately covered in the JCS and NPPF

*Officer Response*

No further work or locally specific policies are required for Biodiversity and Geodiversity assets for the PBW. It is considered that adequate policies are covered in the NPPF, JCS and Biodiversity SPD, SPA SPD and the Habitats Regulation Assessment. Therefore, there is no need for any more locally specific policies. Further guidance on mitigating the effects on the SPA is under preparation.

The Submission Plan policies map will show local designations including local wildlife sites as suggested by a respondent.

Specific policies on Biodiversity and Geodiversity of the JCS and the NPPF that are relevant to the PBW are Policy 4 and Paragraph 109-125 respectively.

<p><b>Issue 8: Water Environment, Resources and Flood Risk Management</b></p> <p><b>Should part 2 of the local plan contain any additional locally specific water resource, environment and flood risk management policies in addition to Joint Core Strategy policy 5? If so what should they say</b></p>	
<p><i>Summary of Comments Received</i></p> <ul style="list-style-type: none"> <li>• One resident felt that no further policy was need in the PBW on water as this was adequately addressed in the JCS.</li> <li>• Little Harrowden and Irchester Parish council would like to see the PBW include flood zones on a Policies Map.</li> <li>• The Environment Agency (EA) stated that JCS policy adequately covered flood risk management and ‘blue’ infrastructure. However the EA suggested that the PBW should contain a policy on the importance of groundwater and a policy that reflects ‘no deterioration’ of water quality using the soon to be published Anglian River Basin Management plan.</li> </ul>	<p><i>Officer Response</i></p> <p>It is the intention of the council to produce policy maps for the submission plan which will include the flood zones within the borough.</p> <p>Since the issues and options consultation, further work has been undertaken on the JCS. The submission version of the JCS now makes reference to the Anglian River Basin Management Plan (ARBMP). Criterion D of Policy 5 of the JCS states that any development that would lead to the deterioration or compromise the ability to achieve good standard status in the ARBMP. Therefore it is considered that there is no need for a further policy on water environment, resources and flood risk management as this has now been adequately covered by the JCS.</p>
<p><b>Issue 9: Land Affected by Contamination</b></p> <p><b>Should part 2 of the local plan have any more locally specific policies on contamination in addition to policy 6 of the Joint Core Strategy? If so what should they say?</b></p>	
<p><i>Summary of Comments Received</i></p> <ul style="list-style-type: none"> <li>• All six respondents felt that no further policy was need in the PBW on land contamination as this is adequately addressed in the JCS.</li> </ul>	<p><i>Officer Response</i></p> <p>No further policy on land contamination is required, this is adequately covered by the JCS and NPPF.</p>

<b>Issue 10: Community Services and Facilities</b>	
<b>Should part 2 of the local plan contain any more locally specific policies on community services and facilities in addition to policy 7 of the Joint Core Strategy? If so what should they say?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• The Nene Valley Nature Improvement Area (NIA) would like to see the PBW include a range of locally specific policies related to open space, particularly on the naturalising of open space. The NIA would also like to see a revised policy on saved policy L6 (Linear Park).</li> <li>• The NHS Property Service supported continual discussion on healthcare services and that any identified need should feed into infrastructure delivery plans and form site specific policies. They said that policy 7 of the JCS was adequate in safeguarding existing facilities.</li> <li>• Two consultees suggested that the PBW must clarify expectations and the mechanism(s) for securing contributions for the provision of community facilities.</li> </ul>	<p>Open Space is dealt with under the section of the plan relating to Green Infrastructure Framework (section 5.). Consultants have undertaken an open space, sports and recreation study, and assessments have been undertaken identifying local green space. This has provided a robust evidence to support local policy text on Green Infrastructure Framework.</p> <p>Policy 7 of the JCS sets out the detailed policy context on Community Services and Facilities. Officers are in regular dialogue with the NHS Nene Clinical Commissioning Group in order to identify how to best plan for healthcare infrastructure within the borough to meet future need. This is ongoing and will feed into the infrastructure delivery plan.</p> <p>Officers are considering the use of a Community Infrastructure Levy (CIL) and the continued use of Section 106 for securing these contributions.</p>
<b>Issue 11: Ensuring High Quality Development</b>	
<b>Are any locally specific policies required on high quality design/development (sustainable buildings and allowable solutions) in addition to the NPPF and Joint Core Strategy policy 9? If so what should they say?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Wollaston Parish Council proposed that the plan should</li> </ul>	It is considered that there is adequate policy provision in the

promote the provision of a cycle route between Wollaston and the town centre. Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group also supported footpaths and cycle ways between rural and urban environments.

- Irchester and Little Harrowden Parish Councils felt that there is no need for locally specific policies on high quality design/ development. However, Wellingborough Chamber of Commerce considers that good design policies are important to ensure the quality of new development is maintained. Ecton Parish Council is also very concerned to secure good design and resist bad design.
- A resident suggested that a minimum size for garages should be specified.
- English Heritage (Historic England) suggested guidance was needed for locally sensitive areas, like conservation areas and Wellingborough town centre.
- Bovis Homes Ltd & Stanton Cross Land Owners Group/ Persimmon Homes Midlands considered that it would be inappropriate to include a locally specific policy on housing standards.

NPPF and the JCS which supports high quality design for development. The JCS Policy 9 sets out sufficient standards on design, resources, energy efficiency and reduction in carbon emissions. Therefore, there is no further need for locally specific policies for the PBW.

### **Issue 12: Development in Gardens**

**How should the council resist inappropriate development of residential gardens, for example where development would cause harm to the local area?**

### **Issue 13: Hatton Park**

**If site specific areas are to be identified that resist inappropriate development of residential gardens should Hatton Park continue to be identified as an area that needs protecting**

**Issue 14: White Delves and Kilborn Close**

**Should the council identify White Delves and Kilborn Close as a site specific area that needs protecting from inappropriate development of residential gardens and development that would harm its local character?**

**Issue 15: Site Specific Areas**

**Are there any other site specific areas that need identifying and protecting?**

*Summary of Comments Received*

- Only six consultees felt that gardens should be guarded from inappropriate development in some way, although there was mixed results on whether this should be through a blanket or site specific policy. Wellingborough Civic Society suggested specific criteria would be needed for clarity.
- Seven respondents felt Hatton Park should be protected from inappropriate development, again there was mixed views on how this could be achieved; the Chamber of Commerce suggested it could become a conservation area.
- Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group recommended gardens of large country houses and halls (e.g. Ecton Hall) as site specific areas that could benefit from protection from inappropriate development.

*Officer Response*

Further research has been undertaken on this matter considering the strength of the policies in the NPPF and the JCS and the success of past local policies (e.g. saved policy U11). It is considered that the NPPF and JCS provided enough policy hooks to successfully resist inappropriate development of residential gardens.

Prior to the NPPF residential gardens use to be regarded as brownfield land. However the NPPF now identifies them as greenfield. Focusing development on previously developed land (brownfield land) is a priority for North Northamptonshire according to the emerging JCS. Policy 6 of the JCS focuses on limiting the use of greenfield land as an important way of ensuring North Northamptonshire's resilience; this includes focusing development away from garden land. Policy 3 on landscape character can also be used to determine

	<p>development that is sensitive to local character.</p> <p>Previous Saved Local Plan Policy U11 was not entirely effective as it lacked robustness. It is also unclear why the area of Hatton Park was identified as the singular area in the borough that required this protection when the borough has many detached and semi-detached houses with generous gardens of character.</p> <p>Therefore garden development should be considered on a case by case basis as this would ensure the same level of protection across the borough instead of favouring some areas. A further local policy will not be needed as this will simply repeat the NPPF and JCS which is unnecessary.</p> <p>These areas of the borough may however wish to consider undertaking a neighbourhood plan.</p>
<p><b>Issue 16: Settlement Hierarchy – Open Countryside</b></p> <p><b>Are there some settlements or groups of dwellings that should not be defined as villages but should be treated the same as open countryside and have greater restrictions on new development? If so which ones and why?</b></p> <p><b>Issue 17: Settlement Hierarchy – Villages</b></p> <p><b>Should a more detailed settlement hierarchy for villages be investigated? If so why particular villages should be treated differently to others?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Hilltop, Hillside, Furnace Lane and Lt Irchester have been suggested as areas that should be treated as open countryside.</li> </ul>	<p>A background paper has been prepared on settlement hierarchy. It is considered that a more locally specific hierarchy is needed for the borough which considers the roles of individual</p>

- The Wellingborough Chamber of Commerce considers it appropriate to include the former 'restraint villages' within the blanket policy of the open countryside or to identify the developable area within a village boundary line as with other villages in the Borough, but that a further detailed settlement hierarchy is not required.
- Irchester, Lt Harrowden and Wollaston Parish Councils have responded that a more detailed settlement hierarchy is not required.
- Ecton Parish Council supports the three tier hierarchy and for Ecton to remain a limited infill village. A resident suggests Ecton should be identified as a Restraint Village
- Great Doddington Parish Council believes that the settlement hierarchy which presently exists in the Local Plan and as proposed for the Site Specific Proposals Plan (2010) with the identified distribution of housing in rural areas was and still is a sensible approach and that Great Doddington should remain a limited development village. Two residents also support Great Doddington remaining as a limited infill village.
- Persimmon Homes Midlands, Bowbridge Land Limited, Hampton Brook and Gladmans consider that all villages should be assessed for their level of sustainability and that a more detailed settlement hierarchy is defined to identify settlements ability to accommodate future growth. Bowbridge has suggested Lt Irchester as a settlement which could accommodate some additional growth. Hampton Brook is suggesting Great Doddington and Gladmans would particularly support the identification of

settlements in the borough.

The suggested local settlement hierarchy contains 3 tiers; village, restraint village and open countryside (which includes settlements of dispersed form).

<p>Bozeat and Great Doddington as sustainable locations for further development.</p>	
<p><b>Issue 18: The Need for Village Boundaries</b> Should village boundaries be identified in part 2 of the local plan?</p> <p><b>Issue 19: Village Boundaries Criteria</b> If the council identifies village boundaries, are the criteria listed in Table 6.2 appropriate?</p> <p><b>Issue 20: Draft Village Boundaries</b> Are the draft boundaries shown in the background paper for each village appropriate?</p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• There was mixed support from consultees between only having village boundary criteria and actually identifying village boundaries on a proposals map. Developers including Persimmons Homes and Gladmans suggested that identifying boundaries on a map was too inflexible and that criteria would be more favourable, however Redrow suggested that boundaries should be identified on a map so as to consistently and clearly apply the criteria. Parish councils supported mapped boundaries.</li> <li>• Seven of the 15 respondents recommended amendments to the criteria. It was suggested that criteria D and E relating to employment sites and rural exception sites need re-evaluating. It was suggested that criteria F and H relating to peripheral or detached properties and key vistas need further clarity. It was also suggested that criteria B relating to land with planning permission needs</li> </ul>	<p>The background paper produced for the issues and options consultation has been updated and proposes the continued use of village boundaries. The paper considers the amendments suggested to the criteria for drawing village boundaries and the amendments put forward on the draft boundaries.</p>

<p>further justification.</p> <ul style="list-style-type: none"> <li>• There have been 17 minor amendments suggested by individuals to the draft village boundaries. Four of the suggested amendments were in relation to Ecton's draft boundary.</li> </ul>	
<p><b>Issue 21: Strategic Gaps</b></p> <p><b>Is there a need to identify strategic gaps for areas of particular sensitivity to coalescence to maintain the separate identities of settlements?</b></p> <p><b>Options</b></p> <p><b>A. No, there are sufficient criteria based policies which seek to protect the setting and character of settlements and prevent coalescence</b></p> <p><b>B. Yes, some areas should be identified on the Policies Map and have greater protection in the form of site specific policies - if so which areas?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• The National Farmers Union, Wyvale Garden Centres, Persimmon Homes, Wellingborough Chamber of Commerce, Lt Harrowden Parish Council and Irchester Parish Council consider there is no need to identify strategic gaps. Gladman would be opposed to use of strategic gaps if these would only be used a tool to prevent sustainable development.</li> <li>• Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group suggest that some areas need to be identified, in particular around Knuston and Little Irchester. Armstrong Rigg Planning on behalf of the Neighbourhood Planning Forum consider it is important for the Wellingborough Local Plan to identify a strategic</li> </ul>	<p>There are considered to be sufficient criteria based policies within the JCS which seek to protect the setting and character of settlements and prevent coalescence. In particular the Vision for the JCS now specifically refers to a 'strong network of vibrant and regenerated settlements which each maintain their separate and distinct character'. This vision is specifically referenced in Policy 1 as defining sustainable development in the local context. Policy 3 also requires that development should 'protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence'. These policies give adequate basis for controlling inappropriate development. They also provide flexibility to use these policies where relevant.</p>

<p>gap between Irchester and Rushden.</p> <ul style="list-style-type: none"> <li>• A resident has supported strategic gaps for all the areas listed in para 6.3.5</li> <li>• Ecton Parish Council and a local resident support Strategic Gaps in particular between Ecton and Northampton, and between Sywell and Northampton.</li> <li>• English Heritage (Historic England) supports the identification of Strategic Gaps. In terms of the historic environment, strategic gaps should be identified, in particular, for Wellingborough and Great Harrowden, Northampton and Sywell and, Northampton and Ecton and also, to prevent the coalescence of surrounding villages with Wellingborough.</li> <li>• Bovis Homes Ltd &amp; Stanton Cross Land Owners Group consider that strategic gaps may be appropriate however, it is not necessary to designate an area of separation between Wellingborough and Rushden. The wide River Nene and A45 corridors already provide a natural barrier to the coalescence of the two settlements, and will therefore; protect their separate identity and character.</li> </ul>	<p>Defining specific areas on the policies map would risk diluting protection for other areas and narrowing the focus for maintaining the separate and distinct character of settlements.</p> <p>The overall spatial strategy, together with the identification of settlement boundaries and development boundaries for the SUEs ensures that the land outside the boundaries will be subject to countryside protection policies. In addition, areas of countryside which are important for providing green infrastructure can be identified and provided landscape protection through the identification of local green infrastructure corridors.</p>
--	--

**Issue 22: The Need For A Retail Hierarchy For The Borough**

**In addition to the hierarchy of centres identified in policy 11 of the Joint Core Strategy, is there a need for the part 2 local plan to include a retail hierarchy for the borough providing for tiers below Wellingborough town centre for the purposes of directing town centre uses to appropriate locations?**

**Options**

**A. Yes, the role and function of additional retail locations in the borough should be recognised in the plan including a description of the type and scale of uses that would be acceptable within them.**

**B. No, the preference should be that all new retail, leisure and commercial uses are directed towards the town centre**

**unless it can be demonstrated that there are compelling reasons why they must be located elsewhere (i.e. trading format, a demonstration that they will meet a specified local need, their relationship with an existing use).**

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• The majority of responses, in particular individuals and Parish Councils, prefer option B, i.e. focusing on Wellingborough Town centre. Only two (National Farmers Union and Wellingborough Chamber of Commerce) expressly prefer option A, although the latter suggests flexibility in respect of town centre uses in areas as Nene Court Retail so they co-exist with the Town centre.</li> <li>• The commercial organisations (Bovis and GL Hearn) are non-committal, preferring to advise that the consideration for a retail hierarchy, should it be the preferred route, should have regard to the approved retail at Wellingborough East and the implications of Rushden Lakes.</li> </ul>	<p>The council commissioned consultants WYG to undertake a Town Centre and Retail Study which assesses the role, hierarchy and function of the retail centres in the borough. A hierarchy has been recommended that sees Wellingborough as the only town centre with a further five local centres across the town. Identifying this structure for a retail hierarchy will ensure that these locations are appropriately considered first as part of any sequential testing for retail and town centre development.</p>

**Issue 23: Identifying A Retail Hierarchy For The Borough**

**If it is agreed that a retail hierarchy for the borough is appropriate, do you agree with the following tiered approach?**

- 1. Growth Town - Wellingborough town centre should be the focus for infrastructure investment and higher order facilities to support major employment, housing, retail and leisure development**
- 2. District Centres - A major group of shops, including at least one foodstore or superstore and a range of non-retail and public services.**
- 3. Local / Village Centres - A group of local shops and services, usually including one or more smaller foodstore.**

**Options**

**A. Yes, the retail hierarchy identified above is proportionate to the range of retail centres in the borough.**

**B. No, the retail hierarchy identified above is inappropriate. If you disagree with the suggested retail hierarchy set out above please state why and where possible suggest any alternative approach.**

**Note: The Embankment business and quasi-retail area (including Nene Court) is dealt with as a special designation and is covered by Issue 41 of this paper.**

*Summary of Comments Received*

- All except one individual support Option A which suggests a tiered approach comprising the Growth Town, District Centres and Local/Village centres. National Farmers Union suggests that Farm Shops should be defined in the hierarchy. The respondent supporting Option B suggests that Option A is too rigid and that the hierarchy should be based on local need.
- The commercial industry supports Option A but reiterates the need for flexibility so that areas with specialist retail functions, e.g. Nene Court, are allowed to flourish.

*Officer Response*

The WYG Town Centre and Retail Study assesses the role, hierarchy and function of the retail centres in the borough. A hierarchy has been recommended that sees Wellingborough as the only town centre with a further five local centres across the town. Identifying this structure for a retail hierarchy will ensure that these locations are appropriately considered first as part of any sequential testing for retail and town centre development.

**Issue 24: Existing Retail Outside Of Defined Centres**

**It is recognised that some shops or parades may not be of a scale suitable for allocation as a defined centre in the plan. Nevertheless, they may provide an important local function worthy of protection. Is a policy needed that identifies and protects shops and parades that serve a neighbourhood function?**

**Options**

**A. Yes, a policy should be included that seeks to retain local shops and services in both the urban and rural areas of the borough unless it can be reasonably demonstrated that they are no longer required.**

**B. Yes, a policy should be included that only seeks to retain local shops in the rural areas of the borough unless it can**

**reasonably be demonstrated that they are no longer required.  
C. No, a policy of this type would place an unnecessary constraint on development**

*Summary of Comments Received*

- All respondents support Option A which calls for a policy to protect existing and isolated or small scale retail facilities outside defined centres.
- Gregory Gray Associates suggests this should only relate to retail with local significance but redevelopment of retail sites within the countryside (.e.g. garden centres) should be subject to general development control criteria as set out in national policy.

*Officer Response*

Following WYG's assessment of retail centres in the borough they also identified a number of shopping parades and neighbourhood shops that were not of a suitable scale to be included in a hierarchy. The WYG Town Centre and Retail Study recommends that the identified parades and shops be protected by a policy in line with paragraph 70 of the NPPF, therefore a policy has been included in the emerging draft plan.

**Issue 25: The Need For An Impact Threshold For The Borough**

**For the purposes of ensuring that new retail, office and leisure proposals do not have an adverse impact on any defined centre in the borough, is there a need to reduce the default impact threshold from 2,500 sqm to a locally proportionate figure?**

**Options**

**A. Yes, there is a need for a single lower impact threshold for the borough to help control out-of-centre development that should apply to all town centre uses. In which case what should it be and/or how should it be calculated?**

**B. Yes, there is a need for a variable impact threshold for the borough to help control out-of-centre development that should be set at different levels for office, leisure and retail development. In which case what should they be and/or how should they be calculated?**

**C. Yes, there is a need for a lower impact threshold for the borough to help control out-of-centre development that should apply to A1 retail uses only. In which case what should it be and/or how should it be calculated?**

<b>D. No, there is no need for a lower impact threshold for the borough and the NPPF threshold should apply.</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Majority of the respondents support Option A which calls for a lower impact threshold for town centre uses. Wm Morrison Supermarkets, in particular, suggests this threshold should be set at 1, 000 sqm given the evidence supporting the emerging Joint Core Strategy forecasts that Rushden Lakes will have a 12% draw on Wellingborough Town Centre. As such, significant retail developments outside the town should not be allowed if the latter's viability and vitality is to be sustained.</li> <li>Bovis Homes and Wellingborough Chamber of Commerce support Option D, i.e. the NPPF threshold, arguing that there is no local justification to depart from the NPPF and that flexibility for town centre uses outside the town centre is required, respectively. For example, office development in Wellingborough could be more realistic around the station rather than in the town centre.</li> </ul>	<p>The NPPF states that the impact threshold will only apply to offices, retail and leisure uses outside the town centres, not all main town centre uses.</p> <p>The Planning Practice Guidance (PPG) sets out what local authorities should consider when setting a local threshold: scale relative to town centres, vitality and viability, whether town centres are vulnerable, likely effects of the proposals on the town centre and impact on any other planned investment.</p> <p>The WYG Town Centre and Retail Study has taken these considerations on board and has recommended that a blanket approach would be inappropriate across all centres and that instead thresholds which related to the types of centres would be more appropriate. They have recommended an impact threshold of 1000sqm in the town centre and 200sqm in the local centres.</p>
<b>Issue 26: Connectivity</b> <b>Are there any locally specific policies required on 'connectivity' in addition to the NPPF, Northamptonshire Transportation Plan, The Wellingborough Interim Town Transport Strategy and the Joint Core Strategy policy 15? If so what should they say?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Bovis Homes Ltd &amp; Stanton Cross Land Owners Group considered that additional policies on connections are not</li> </ul>	<p>Officers support views expressed by some of the respondents that no further policies are required for PBW. Policies on</p>

required in the PBW.

- Irchester Parish Council suggested that no locally specific policies are required on connectivity. However, Little Harrowden Parish Council suggested improvements to public transport, footpaths and cycle routes especially to Gt Harrowden from Lt Harrowden.
- NCC Highways suggested that the Urban Structures Study should be used to help identify any locally specific connectivity policies within Wellingborough.
- Wellingborough Civic Society suggested that appropriate and well planned cycle ways should be prepared and implemented in Wellingborough.
- Wollaston Parish Council commented that residents in the village are concerned about the volume of traffic generated by travel to and from work and at the beginning and end of the school day and suggested a separate rural connectivity policy for the PBW.
- Wellingborough Chamber of Commerce suggested that provision should be made to support strategic connections between the town centre and the new urban extensions.
- A resident stated that Wellingborough is poorly served by safe cycle routes and there is no rail link to major places like Northampton, Milton Keynes and Cambridge.
- Bedfordshire Railway & Transport Association's main concern is rebuilding and reopening Irchester Station and renewing a link between Northampton and the Midland Main Line.

transport and connectivity are extensively covered in the NPPF, the JCS and the County Council's transport policy documents (Northamptonshire Transportation Plan and Wellingborough Interim Town Transport Strategy).

Similarly, the council awaits the information for transport modelling for Wellingborough to be generated on the emerging plan.

**Issue 27: Green Corridors**

**Should locally specific green infrastructure corridors be identified?**

**Options**

**A. Yes, to give greater detail to those in the Joint Core Strategy, or designate new ones?**

**B. No, there is no need to include this information at the local level**

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"><li>• Natural England; Irchester Parish Council; Wellingborough Civic Society; Cyclists Touring Club Right to Ride Network; Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group; Hampton Brook and Wellingborough Chamber of Commerce all said that the PBW could provide more detail on green infrastructure and identify locally specific corridors.</li><li>• The National Farmers Union stated that GI corridors should not restrict development.</li><li>• The Nene Valley Nature Improvement Area suggested that identifying specific green infrastructure elements within the local corridors could help to evaluate potential development impacts or contributions to green corridors.</li><li>• Sport England considers that there should be a greater emphasis in the PBW with regard to public health and the benefits of sport.</li></ul>	BCW commissioned a consultant to carry out an open space, sports and recreational facilities study. This covers various typologies of open space including green infrastructure corridors/linear green space. The outcome of the study provides a robust local evidence, policy context and decision making tools for green infrastructure corridors and these have been identified in the PBW.

**Issue 28: Protecting Existing Assets**

**How should existing open space, sports and recreational facilities be protected at the local level?**

**Options**

- A. The part 2 local plan should continue to use EIOS and IAA. Is this distinction still appropriate?**
- B. A new single designation which covers the protection of open space.**
- C. The use of local criteria for identifying important open space? If so, please suggest local criteria for identifying important open space.**

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• English Heritage (Historic England), the Wellingborough Civic Society and Hampton Brook suggested that a new single designation and a criteria based approach are the best ways to protect open space.</li> <li>• Irchester Parish Council, Little Harrowden Parish Council, and Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group suggested that the PBW should continue the use of Environmentally Important Open Space (EIOS) and Important Amenity Area (IAA) designations found in the previous local plan.</li> <li>• Natural England suggested that providing greenspace that meets quality standards such as the green flag award could increase visitor attraction.</li> <li>• Francis Jackson Homes commented that land of poor visual quality, no public or recreational use, and with no positive impact on the character of the settlement should not be protected.</li> <li>• Bovis Homes Ltd &amp; Stanton Cross Land Owners Group suggests that additional local policy is not required on open space.</li> <li>• Wellingborough Civic Society suggested that school playing fields, allotments, recreation grounds and pocket parks should be given ample protection.</li> </ul>	<p>BCW commissioned consultants to undertake an open space, sport and recreation facilities study. This provides robust evidence to support planning policy decisions for open space, sport and recreation designations. In addition, the council has reviewed existing EIOS and IAA designations set out in the local plan to establish its compliance with the NPPF (para. 76/77) and PPG criteria on local green space designations. This process provides the council with a credible methodology and approach for local green space and local open space designations in Wellingborough.</p> <p>The PBW includes designations for two types of open space.</p>

<ul style="list-style-type: none"> <li>• Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group suggested that archaeological assets need to be considered within open space.</li> </ul>	
<p><b>Issue 29: Important Open Space that Needs Protection</b></p> <p><b>Are there any types of important open space, sports and recreational facilities which should be protected? If so, where?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Respondent suggested the protection of two small areas of EIOS in Great Doddington.</li> <li>• NIA stated that the Linear Park should be protected and enhance as it is a distinctive feature of Wellingborough.</li> <li>• Wellingborough Civic Society suggested that School playing fields, allotments, recreation grounds and pocket parks should be given much protection.</li> <li>• Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group suggest that archaeology assets need to be considered within open space.</li> <li>• Bovis Homes Ltd &amp; Stanton Cross Land Owners Group suggested that no additional local policy is required to protect important open space.</li> </ul>	<p>BCW appointed consultants to carry out an Open space, sport and recreational facilities study. This covers all the typologies of open spaces including parks and gardens, natural and semi-natural green space, amenity green space, green infrastructure corridors/linear green corridors, provision for children and young people, indoor and outdoor sports, allotments and community gardens, cemeteries and churchyards and civic spaces. The outcome of this study provides evidence and policy context for the protection and enhancement of open space, sport and recreation within the borough.</p> <p>In addition, the council has reviewed existing EIOS and IAA designations set out in the local plan to establish its compliance with the NPPF (para. 76/77) and PPG criteria on local green space designations. This process will help the council make planning decision on local important open space, sports and recreational facilities that need protection or/and enhancement.</p>
<p><b>Issue 30: New Open Space Provision (Local Standards)</b></p>	

**How should new open space, sports and recreation facilities be provided?**

**Options**

- A. All new housing developments should contribute to open space provision either on the site or off-sites based on adopted local standards**
- B. All housing developments should contribute to open space if there is a deficiency of open space in the area based on adopted local standards.**
- C. Developments over an agreed threshold should provide open space on site.**

*Summary of Comments Received*

- The majority of respondents, including Wellingborough Civic Society, felt that new open space, sports and recreation facilities should be provided through all new housing development contributing, based on adopted local standards.
- Hampton Brook and Bovis Homes, however, considered that it is only appropriate for sites to contribute towards open space if shortages are identified; it is not helpful to apply blanket requirements.

*Officer Response*

The council commissioned consultants to carry out an open space, sport and recreational facilities study. The outcome of this study provides evidence and policy context to set local standards for new open space provision.

**Issue 31: Employment Sectoral Targets**

**Should part 2 of the local plan set targets for specific employment sectors: such as B1, B2, B8 and non-B uses, against which employment land targets can be identified?**

**Options:**

- A. Set specific targets for employment sectors in the plan in accordance with indicative splits set out in Table 9.1 or any other (please state).**
- B. Retain flexibility between employment uses by not including specific targets but using the indicative splits in Table**

**9.1 (or any other) for monitoring and reviewing purposes only.**

Summary of Comments Received	Officer Response
<ul style="list-style-type: none"> <li>• Irchester PC, Little Harrowden PC, Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group, Wellingborough Chamber of Commerce, Hampton Brook and Bovis Homes Ltd &amp; Stanton Cross landowners support option B (retaining flexibility) in order to respond to the market in the delivery of employment space when demand arises. Bovis suggests it is good practice to establish robust job creation targets in order to create a balance between housing and jobs but it is not necessary to split these targets in Wellingborough given the excess supply of committed sites.</li> <li>• Wellingborough Chamber of Commerce suggests that aspirations for higher level jobs must be tempered with realism. For example, it suggests that Wellingborough is not traditionally recognised/viewed as an office location so flexibility would be required for allocations of office space around the station. High value engineering and manufacturing would be more realistic and would need to be located near the A45 to provide high profile, accessible locations for investors. Incentives may be required to relocate to the town, e.g. mini enterprise zone to attract businesses so the borough can compete with other centres like Northampton which has an EZ.</li> <li>• Northampton Borough Council advocates the setting of sectoral targets as set out in option (a) above because 'B' uses are more distinct from others because they integrate</li> </ul>	<p>Flexibility to respond to market signals is a key requirement of the NPPF. The majority of employment land supply in the borough is committed and the indicative sectoral splits are identified in the master plans. Policy 23 of the JCS seeks to deliver the mix and scale of employment uses identified in the approved master plans with sufficient in-built flexibility provided for in policy 22 in respect of proposals for revised mix/scale. For this reason, and the fact there is an excess supply of employment land, it will not be necessary to set sectoral targets. However, the Council will ensure there is sufficient buffer to allow for any unforeseen changes in mix.</p> <p>The issue of an Enterprise Zone is a delivery matter that can be considered at the appropriate time in the Economic Strategy.</p>

<p>their services and have more specific locational requirements. It also states that in order to reduce net-out commuting, enough jobs and sites will have to be secured in Wellingborough, other than relying much on large developments like Rushden Lakes. Wellingborough will need to identify how infrastructure requirements to meet this need will be addressed.</p>	
<p><b>Issue 32: Employment Outstanding Commitments</b>  <b>Do you consider that any of the non-strategic outstanding commitments in Table 9.3 are unlikely to come forward for development within the plan period?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Only three responses were made by Bovis, Anglian Water and Wellingborough Chamber of Commerce, none identifying any constraints affecting the deliverability of the sites. However, Bovis highlights that some of the area allocated for B1 at WEAST will be re-allocated for housing (see Issue 85 below).</li> </ul>	<p>The proposed change of mix involving re-allocating to housing some of former B1 sites at WEAST - the council has considered an application for this having regard to policies 22 &amp; 23 and given permission subject to a S106 being agreed. This however is not taken account of as part of the PBW or ELR at this stage as the consent has not been issued and the cut of date used for monitoring purposes is 31March 2015. Notwithstanding this the ELR identified a surplus of employment land.</p>
<p><b>Issue 33: Employment Site Portfolio</b>  <b>Do you think the portfolio of existing commitments provides a mix of land of sufficient quality for B1, B2 and B8 uses to meet the future needs of the borough? If not are any further non-strategic sites necessary?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Wellingborough Chamber of Commerce suggests that the amount of allocated B1 (office/R &amp; D/light industry) will be difficult to deliver through the current allocated sites (22</li> </ul>	<p>Stanton Cross is a strategic commitment identified in the emerging Joint Core Strategy (JCS). Its deliverability has been addressed as part of the strategic employment land review and</p>

<p>ha Stanton Cross &amp; 7 ha Wellingborough North) because they are too large, in the case of the former, and in the wrong location. It suggests that the land adjacent Wilby Way (Prospect Park) is suitable for high tech industry and provides greater flexibility for this type of employment.</p> <ul style="list-style-type: none"> <li>• Nathaniel Lichfield acknowledges that the Council has surplus employment land , particularly in the B1 (Office), category but regrets that these have not been tested for deliverability and that the results of the on-going Employment Land review have not been consulted upon in this Issues and Options paper. This notwithstanding, it states that the Council will need to address this land imbalance.</li> </ul>	<p>will be tested at examination of the JCS. This plan, the second part of the local plan, will not assess the deliverability of any strategic sites. This applies to sites of a strategic nature like Prospect Park which was previously assessed by the JPU as part of the strategic site allocation exercise.</p> <p>In respect of the ELR, further work has been carried out to identify the non-strategic sites which, together with the strategic sites in the JCS, form the portfolio of future employment land supply in the borough.</p>
<p><b>Issue 34: Current Mixed Use Allocations</b></p> <p><b>Do you consider that any of the current allocations in Table 9.4 are unlikely to come forward for employment development within the plan period and should be de-allocated?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester Parish Council and Anglian water did not identify any deliverability issues with the sites.</li> <li>• Wellingborough Chamber of Commerce calls for greater flexibility in considering town centre redevelopment of sites having regard to the changing economic and retail landscape. The mixed use schemes have become increasingly difficult to deliver partly due to viability issues, e.g. leisure facilities now need a subsidy to come forward. Flexible policies will allow the town centre to take</li> </ul>	<p>The Employment Land Review (ELR) identifies individual circumstances of the sites and assesses their deliverability. The Council commissioned a town centre and retail study to assess the current mixed use allocations. The former post office depot / BT exchange site, Alma Street/ Cambridge Street site and the High Street/ Jacksons Lane site will continue to be brought forward as mixed use allocations.</p>

<p>advantage of future development opportunities. At present, these opportunities can be assessed at development management level against the NPPF and JCS.</p>	
<p><b>Issue 35: Current Allocations</b></p> <p><b>Are site specific policies required to guide development on any of the sites in Table 9.4?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester Parish Council says there must be site specific policies to guide their redevelopment.</li> <li>• Wellingborough Chamber of Commerce calls for flexibility in respect of these centres. However, it suggests a strategic policy may be required for Neilson’s Sidings in Stanton Cross to retain its potential for rail freight development and not allow further residential development. Also, it points out to the potential for residential development on land south of Finedon Road, e.g. Wilby Way A45 should this be required.</li> </ul>	<p>The Council has carried out further work in respect of the Employment Land Review (ELR). This work assesses the deliverability of the sites. The ELR informs the Council as to the best way to utilise these sites having regard to the need for land for various sectors, e.g. housing, retail or any other in the future. This has informed the policy approach to the future development of the sites.</p> <p>The results of the council commissioned town centre and retail study have also been used to identify any requirements to guide development on these sites. Therefore site specific policies have been developed for the three town centre sites that are being allocated for mixed use.</p> <p>Neilson’s Sidings is part of the consented WEAST scheme. The future development of the urban extension should satisfy policy 22 (Delivery Economic Prosperity) of the emerging Joint Core Strategy (JCS). Whether the urban extensions require development principles to guide future detailed applications or any future revisions of the master plans is a matter separately</p>

	discussed under Issue 86 of this document.
<b>Issue 36: Potential Office Allocations</b>	
<b>Are there any sites within the town centre or on the edge of the town and in sustainable locations that should be allocated for offices, including research and development?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Irchester Parish Council did not identify alternative sites for office development.</li> <li>• Wellingborough Chamber of Commerce submits that Wilby way (A45) is a preferable location for high quality B1 (R &amp; D) over other sites already allocated or consented.</li> </ul>	The Council currently has a significant supply of consented B1 use land particularly at the sustainable extensions of WEAST and Wellingborough North. These committed sites are identified as consented schemes in the JCS and their deliverability has been assessed through the JCS. The case for Wilby Way was considered as part of the strategic employment allocation exercise.
<b>Issue 37: Potential Storage and Distribution Allocations</b>	
<b>Are there any sites on the edge of the town and in sustainable locations that should be allocated for non-strategic storage and distribution?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• One response by Wellingborough Chamber of Commerce stating that there will be no additional B8 sites which would be preferable to those already allocated.</li> </ul>	Noted.
<b>Issue 38: Sequential Testing</b>	
<b>Should the policies in the part 2 local plan allow exceptions to sequential testing, for example to regenerate areas close to the town centre?</b>	

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Irchester and Little Harrowden Parish Councils say there should be exceptions to sequential testing in order to regenerate some areas close to the town centre.</li> <li>Wellingborough Chamber of Commerce suggests there should be flexibility in the use of sequential testing such that areas like those around the station should be a focus for office development if this is a viable proposition.</li> </ul>	<p>The Council has a significant supply of land for B1 (Office) uses, particularly at WEAST and Wellingborough North. As such, the station area is already catered for being part of WEAST.</p>
<p><b>Issue 39: Retention of Established Industrial Areas</b></p> <p><b>Should the established industrial estates be retained for employment purposes and be safeguarded on the policies map?</b></p> <p><b>Options:</b>  <b>A. Yes.</b>  <b>B. No.</b></p>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Irchester Parish Council says the established industrial estates should not be retained and safeguarded on the policies map but Little Harrowden say they should.</li> <li>Irchester/Lt Irchester &amp; Knuston Neighbourhood Plan Steering Group says they should not (option B), suggesting they have to be looked at individually, citing old industrial buildings at Parsons Hall (Irchester) and Denington Industrial estate as examples. It suggests further that feasibility for alternative uses like housing could be explored.</li> <li>Wellingborough Chamber of Commerce supports option</li> </ul>	<p>The Employment Land Review (ELR) assesses the established industrial areas (including Denington) in terms of their suitability and market attractiveness for continued use as industrial areas and for inclusion into the portfolio of future employment land supply in the borough. The suggestion for a flexible approach is part of that consideration mainly based on the current and projected performance of the estates, for example, vacancies, churn, market appeal, etc. The outcome of the assessments suggested that all existing industrial estates be retained for employment but with the allowance of ancillary uses in order to maintain flexibility.</p>

<p>B, i.e. removing the designation, citing Denington and Finedon as estates requiring a more flexible approach. It suggests the frontage of Denington road could become active with quasi-retail, leisure and bulky retail operators not suitable for town centres. The exceptions to these are Park Farm industrial estate which is fairly new and self-contained Laurence Leyland industrial estate which should remain in B1/B2/B8 use.</p> <ul style="list-style-type: none"> <li>Nathaniel Lichfield suggests that established industrial areas should not be protected because the Council already has an oversupply of B1 employment land in respect of identified future need. Continued protection would, it suggests, be contrary to paragraph 22 of the National Planning Policy Framework (NPPF) and would not provide sufficient flexibility for adaption to meet market demand, for example, for residential development. To this end, it suggests that 90 Denington Road be de-allocated for an alternative use.</li> </ul>	<p>Existing industrial areas are an important source of supply of industrial land and may provide opportunities to accommodate future requirements through further expansion and/or intensification of use. The oversupply of B1 industrial sites is in respect of objectively assessed need in the future. It is acknowledged that the NPPF discourages local planning authorities from protecting land over long periods of time where there is no possibility that such sites could come back into use in the near future. For environmental and amenity reasons, established industrial areas such as Denington would normally be incompatible with non-B uses like housing. The sites within these would normally be considered as part of the review of the whole industrial area, not an individual site. No. 90 Denington has been granted permission subject to section 106 agreement.</p>
<p><b>Issue 40: Measures to Enhance Established Industrial Areas</b></p>	
<p><b>What measures, if any, can be taken to ensure that the existing employment areas meet market requirements?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Several measures are suggested: (i) local grants, less red tape, support for small businesses (Little Harrowden Parish Council); (ii) alternative access routes for cycles or widening of Finedon Road and Rixon Road which cyclists</li> </ul>	<p>The Council has drafted and consulted upon an Economic Strategy for the borough which considers ways to attract inward investment and support small businesses. The Council will continue to work with stakeholders including Cyclists Touring,</p>

<p>currently avoid because of bends (Cyclists Touring);(iii) control over HGV parking particularly at Victoria Retail Park, Park Farm and other industrial areas where drivers park overnight - although this could be covered by policy 18 of the Joint Core Strategy (Wellingborough Chamber of Commerce).</p>	<p>the Wellingborough Business Improvement District (BID); Highways Authority, etc. to implement the strategy for cycling infrastructure in the borough. For HGV parking, policy 18 sets out the criteria for assessing proposals for these.</p>
<p><b>Issue 41: The Embankment</b></p>	
<p><b>Should saved policy U12 be carried forward into the local plan to safeguard the quasi-retail and employment designation?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester Parish Council, Little Harrowden and Wellingborough Chamber of Commerce support the retention of policy U12 to allow business and quasi-retail activities of a specialist nature which would not necessarily be accommodated in the town centre.</li> </ul>	<p>The Embankment is a quasi out of centre retail location. The site was assessed as part of the retail and town centre study, it was found that the centre functions as a retail park and should remain considered as ‘out-of-town’. The Employment Land Review (ELR) also assesses this site from an employment perspective. It is considered that the site does not require a site specific policy and any development put forward in the vicinity should be subject to the sequential test.</p>
<p><b>Issue 42: Victoria Business Park (A45)</b></p>	
<p><b>Should the fully developed site, Victoria Business Park (A45), be identified on the policies map as an established industrial estate in the same category as the four estates highlighted in paragraph 9.2.9 of the Issues and options document?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester and Little Harrowden Parish Councils, Irchester,</li> </ul>	<p>This industrial area is fairly new and has been assessed as part</p>

<p>Lt Irchester, Knuston Neighbourhood Plan Steering Group and Wellingborough Chamber of Commerce all support the designation of Victoria Business Park as an established industrial area on the proposals map.</p>	<p>of the Employment Land Review (ELR). It is under full occupation with easy access to the A45. The council is proposing to identify it as an established industrial area on the policies map.</p>
<p><b>Issue 43: Employment Protection Policies</b></p> <p><b>Are any locally specific policies required to protect or offer flexibility for existing employment sites in addition to the policies in the Joint Core Strategy and the NPPF? If so what should they say?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester and Little Harrowden say no policies in addition to those in the emerging Joint Core Strategy (JCS) and National Planning Policy Framework (NPPF) are required to protect or offer flexibility to existing employment areas.</li> <li>• Bovis Homes Ltd and Stanton Cross Landowners Group express a desire for flexibility in respect of the committed employment sites within WEAST so that it is not an absolute requirement to demonstrate that the sites are unlikely to come forward. As such, future policies need flexibility in this regard, particularly in view of the oversupply of employment land in the borough. In fact, WEAST alone can accommodate the entire job target of 1,120 B1 for the period between 2011 and 2031.</li> <li>• Wellingborough Chamber of Commerce say derelict employment areas located within WEAST, for example Land South of the Railway, should continue to have protection. It also enquires about the possibility for allocating Simplified Planning Zones for Council owned employment land in the borough.</li> </ul>	<p>Established employment areas will be identified on the local plan policies map underpinned by a specific policy to manage future development. The existing SUEs and all other employment areas are sufficiently covered by policies 22 and 23 of the JCS.</p> <p>Other site specific policies from the saved local plan have been considered as part of the process, a policy has been brought forward on Sywell Aerodrome. It was not considered necessary to bring forward any other site specific policy on employment land as this is well covered by the JCS, particularly through policy 25.</p>

<b>Issue 44: Criteria for Alternative Use of Employment Land</b>	
<p>What criteria should be used to determine whether employment areas and premises could be developed for an alternative use (if required):</p> <p><b>Options</b></p> <ul style="list-style-type: none"> <li><b>A. Market led approach - providing evidence on viability and period of marketing</b></li> <li><b>B. Physical and environmental constraints - providing evidence that the site is incapable of adaption or environmental issues mean that the employment use may not continue</b></li> <li><b>C. Allow a more flexible approach</b></li> </ul>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Persimmon Homes Midlands, Irchester/Lt Irchester and Knuston Neighbourhood Plan Steering Group, Wellingborough Chamber of Commerce and Nathaniel Lichfield &amp; Partners all support a flexible approach (option C) in respect of alternative use of existing employment land. This, they argue, will comply with the flexibility provided for in the NPPF which discourages the long term protection of employment sites if there are no reasonable prospects such sites will be used for the allocated employment uses and to adapt to changes in market signals.</li> </ul>	<p>The Employment Land Review (ELR) recommends that ancillary uses that complement the existing employment uses be acceptable. It also recommends inclusion of a development management policy regarding proposals which involve non employment uses that should be criteria based. The criteria should be based around a market led approach and physical and environmental constraints, rather than one or the other, to allow for the greatest flexibility in the policy.</p>
<b>Issue 45: Finedon Sidings and Sywell Aerodrome</b>	
<p><b>Should the specific policies for Finedon Sidings and Sywell Aerodrome be carried forward into part 2 of the local plan?</b></p>	

<p><b>Please specify for each site.</b></p> <p><b>Options</b></p> <p><b>A. Yes - without amendments</b></p> <p><b>B. Yes - in a modified form. Please explain.</b></p> <p><b>C. No - should be considered against the employment policies in the Joint Core Strategy and NPPF.</b></p>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Irchester Parish and Little Harrowden Parish Councils and Wellingborough Chamber of Commerce support the carry-over of saved site specific policies LH1 and SY1 respectively into the new local plan. However, Wellingborough Chamber of Commerce suggests SY1 should be amended to accommodate high value manufacturing and engineering employment especially those associated with the aviation industry, subject to mitigation of traffic impact through the village. It argues that the Sywell Aerodrome is an important business asset for the borough and the rest of Northamptonshire</li> </ul>	<p>The Employment Land Review (ELR) assesses these sites for suitability and market attractiveness in respect of the current uses. It is considered that policy 25 of the JCS adequately covers Finedon Sidings and a further policy is not required. However, due to the special mix of uses at Sywell Aerodrome, in particular the aviation uses which are not specifically covered by the JCS; it was considered necessary to identify a site specific policy for the site.</p>
<p><b>Issue 46: Rural Site Specific Policies</b></p> <p><b>Are there any other employment sites in the rural area which need site specific protection in part 2 of the local plan? Please specify their location and explain why.</b></p>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Irchester Parish, Wollaston and Little Harrowden Parish Councils and Wellingborough Chamber of Commerce all say no additional site specific policies for other employment sites in the rural areas are necessary. These</li> </ul>	<p>Most of these sites are in the parishes currently developing Neighbourhood Plans (Irchester/Lt Irchester/Knuston, Earls Barton and Wollaston) which should identify the future use of such sites through the neighbourhood planning processes. If</p>

will be covered by policy 22 of the JCS.	such plans are not sufficiently progressed by the time this plan is adopted policy 22 of the JCS should adequately manage their redevelopment. No further policies are therefore proposed.
<b>Issue 47: Additional Rural Employment Sites</b> <b>Should other sites within the rural area be allocated for employment? If so, please indicate the location and area of the site on a map.</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Irchester and Little Harrowden Parish Councils and Wellingborough Chamber of Commerce have no additional sites.</li> <li>• Gregory Gray Associates acting for Wyevale Garden Centres are promoting the site for future employment allocation because of its excellent transport links and the fact it would represent an effective use of brownfield site in terms of the NPPF thereby protecting the open countryside from development incursion.</li> </ul>	This site has been assessed together with other sites as part of the Employment Land Review (ELR).No need for any additional rural allocations has been identified.
<b>Issue 48: Employment Site Assessment Methodology</b>	
<b>Do you think the criteria for assessing the employment sites in the background paper is robust? Please explain.</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Only one response from Wellingborough Chamber of Commerce stating that they would need to be consulted in detail on this matter as they are carrying further work to feed into the Employment Land Review</li> </ul>	The methodology has been updated to ensure its consistency with the housing methodology.
<b>Issue 49: Call for Additional Sites</b>	

**Do you have any other site(s), not included in the sections above, which would be appropriate for business/employment uses? Please specify the site(s), the owner(s) (if known) and why you feel it is a suitable location?**

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group is identifying such sites through the neighbourhood planning process.</li> <li>• David Lock Associates acting for Stepnell Ltd are promoting a strategic site (c. 20.3 hectares) between Finedon Road Industrial Estate to the south and The Slips to the north.</li> <li>• Tristan Peck acting on behalf of Landowner of Sywell Grange Farm are promoting Sywell Grange</li> <li>• Wellingborough Chamber of Commerce are promoting Prospect Park, especially the employment element, although it has been discounted through the JCS process.</li> <li>• Henry Bletsoe &amp; Son acting on behalf of Landowner, Station Road, are promoting two sites in Earls Barton, one gaining access off Station Road and another for future growth of Earls Barton with a new link created from the B573 to Station Road. They suggest that other land owners are willing to see their land brought forward for future development.</li> <li>• Fisher German LLP acting for landowner for Trustees of Ecton Estate are promoting two potential sites for consideration: Walled garden, Ecton &amp; Northampton Road, Earls Barton.</li> </ul>	<p>The land between Finedon Road and south of the Slips, Sywell Grange, and Prospect Park are above the threshold for the land being assessed through the Employment Land Review (ELR) that the Council is undertaking. They all have strategic significance for the region and as such should not be dealt with through the PBW. Strategic sites are matters for the JCS.</p> <p>The sites within Earls Barton were considered as part of the neighbourhood planning process.</p>

<ul style="list-style-type: none"> <li>Savills on behalf of Oxford University Endowment Management Ltd (OUEM) are promoting a large area of land south west of Wellingborough for mixed use development comprising 14 hectares of employment and 765 dwellings. The site is approximately 87 hectares and lies west of Park Farm Way and north of Mears Ashby Road.</li> </ul>	
<p><b>Issue 50: Renewable and Low Carbon Energy</b></p> <p><b>Are any more locally specific policies required on renewable or low carbon energy in addition to the Joint Core Strategy or the NPPF? If so what should they say?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Irchester &amp; Little Harrowden Parish Councils, Bovis Homes Ltd &amp; Stanton Cross landowners Group (represented by Define) and Wellingborough Chamber of Commerce do not consider a locally specific policy for renewable energy or low carbon energy.</li> <li>English Heritage (Historic England) suggests that inclusion of the policy in the local plan would permit examination of the appropriateness of proposals for renewable and low carbon energy generation.</li> </ul>	<p>Noted. The JCS and the NPPF are considered to provide sufficient policy context for the PBW.</p>
<p><b>Issue 51: Skills and Training</b></p> <p><b>What other measures, if any, need to be taken to ensure that training opportunities are created in the borough?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>

<ul style="list-style-type: none"> <li>• Little Harrowden - ensure training centres remain open</li> <li>• Wellingborough Civic Society - support development of Tresham College to create workforce and skills required by local industry and businesses through apprenticeships and training.</li> <li>• Wellingborough Chamber of Commerce- contributions towards construction industry training.</li> </ul>	<p>The Council has drafted and consulted upon an Economic Strategy for the borough which addresses this aspect.</p>
<p><b>Issue 52: Urban Housing – Existing Commitments</b></p> <p><b>Are the non-strategic sites listed in Table 10.3 suitable, available and developable?</b></p> <p><b>Issue 53: Urban Housing – Existing Commitments</b></p> <p><b>When are the non-strategic sites listed in Table 10.3 of the PBW: Issues and Options likely to be delivered and are they likely to deliver the entire capacity within the plan period?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• A resident is disappointed at the loss of agricultural land</li> <li>• Two residents are concerns about the traffic effects on Northampton Road and Shelley Road of the Park Farm Way/Shelley Road site</li> <li>• Irchester and Lt Harrowden Parish Councils consider the non-strategic sites listed in Table 10.3 to be suitable, available and developable.</li> <li>• The Wellingborough Civic Society questions the deliverability of the Market Square and the cemetery.</li> <li>• Hallam Land Management supports land at Park Farm</li> </ul>	<p>All the sites have been assessed for their suitability, availability and developability. This is presented in a background paper. The assessment has taken into account the comments made on individual sites including information provided by landowners and promoters.</p> <p>A 5 year supply of housing has been demonstrated as part of the evidence submitted to the JCS examination. This will be updated by the borough council to accompany the submission plan.</p>

Way, Wellingborough. Commencement of development and first completions are anticipated in 2017/2018

- Hampton Brook consider that there are fundamental errors of assumption about the availability and delivery of strategic and non-strategic development schemes in Wellingborough which will continue to significantly affect the Borough's ability to meet its housing requirements in terms of overall supply and also its five year requirement. Their analysis demonstrates that there is an over-reliance on the strategic allocations, and the Local Plan should allocate more non-strategic sites to aid certainty and deliverability of supply over the plan period. Specific comments are made regarding the deliverability of the following sites: East of Eastfield Road - Phase 3; Windsor Road; Leys Road/Highfield Road; Hardwick Park; Site B TCAAP - Vauxhall Dealership; Site C TCAAP - High Street; Site D TCAAP - Queen Street; Site E1 TCAAP - Tresham Institute; Site E2 TCAAP - Market Square; Site F TCAAP - West End DIY and Fiddlers Elbow; Site G TCAAP - Alma St/ Cambridge St backlands; Site I TCAAP - former PO Sorting Depot; Wellingborough East; Wellingborough North; and Park Farm Way/Shelley Road
- The Wellingborough Chamber of Commerce believe the following sites are unlikely to come forward: Site B TCAAP – Vauxhall Dealership; Site E2 TCAAP – Market Square; Site F TCAAP – Fiddlers Elbow/West End DIY; Site H TCAAP – Cannon Street/York Street; Site I TCAAP – Former PO Sorting Office. Other sites are likely to

<p>deliver towards the end of the plan period especially sites which rely on infrastructure provided by the Urban Extensions.</p>	
<p><b>Issue 54: Urban Housing - Assessment Methodology</b></p>	
<p><b>Is the assessment methodology set out in the background paper Wellingborough Town Housing Allocation Methodology and Site Selection appropriate?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester and Lt Harrowden Parish Councils support the methodology.</li> <li>• English Heritage (Historic England) is happy that the assessment methodology includes consideration of the effect of the development proposals on landscape and cultural heritage.</li> <li>• Hampton Brook considers criterion 1 (Accessibility) to be overly simplistic, poorly defined and therefore likely to be open to a high level of subjectivity during any assessment.</li> <li>• The Wellingborough Chamber of Commerce have suggested further work is required on appropriateness of Housing Allocation Methodology and Site Selection</li> <li>• Anglian Water welcomes the reference made to utility provision. Water supply and wastewater infrastructure should be form part of this criteria.</li> </ul>	<p>The assessment methodology has been revised taking account of the comments made. In particular a more detailed assessment of accessibility has been included. The revised methodology is available in a background paper to support the identification of preferred sites.</p>
<p><b>Issue 55: Urban Housing - Potential Sites</b></p>	
<p><b>Are the sites listed in Table 10.4 of the PBW suitable, available and developable?</b></p>	

## Issue 56: Urban Housing – Potential Sites

When are the sites listed in Table 10.4 likely to be developed and are they likely to deliver the entire capacity within the plan period?

### *Summary of Comments Received*

- Two residents are concerned about the traffic implications and the impact on the natural habitat of land at Northampton Road.
- Hampton Brook has supported identification of land at Northampton Road. Since the publication of the draft plan, an outline planning application has been submitted to the Council by DLP on behalf of Hampton Brook, in the region of 102 dwellings.
- Northamptonshire County Council Highways will comment on individual sites as part of the assessment. They and the Highways Agency have both said that whilst the sites proposed are relatively small in nature, their cumulative impact if they all come forward could have a significant impact on the highway network and their impact should be assessed, particularly on the radial corridors, the town centre as well as on the principal and strategic network through a transport assessment process as part of determining whether they are suitable.
- A resident has queried the capacity of 25 Gold Street and suggested a lower density should apply.
- English Heritage (Historic England) has noted that the Depot 25 Gold Street site is close to the Grade II listed

### *Officer Response*

All the sites have been assessed for their suitability, availability and developability. This is presented in a background paper. The assessment has taken account of the comments made on individual sites including information provided by landowners and promoters.

Northamptonshire County Council Highways have commented individually on all the sites and this has been taken into account as part of the assessment. Not all of the sites will be promoted through the plan, but there will be an opportunity to assess the cumulative impact on the highway network when the emerging draft plan is ready. This is not anticipated to be any greater than the level of growth already modelled as part of the JCS.

A revised methodology has been included to more appropriately assess the potential capacity of sites which takes account of site specific constraints.

Site specific policies have been prepared for a number of sites to address any specific constraints or opportunities.

<p>public house, the Fox and Hounds. The setting of this designated site needs to be taken into account when a scheme is drawn up.</p> <ul style="list-style-type: none"> <li>• A resident has suggested that gardens and parklands should have the lowest priority for development, with previously developed land being given much higher priority.</li> <li>• Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group have queried the suitability of sites on parks and in conservation areas and would hope the interwar factory facade at George Cox, Westfield Road could be retained in some way with any new development.</li> <li>• Anglian Water has confirmed that as water and sewage undertaker it is able to provide advice to Council on the extent that water and wastewater infrastructure improvements may be required to serve the sites identified.</li> <li>• The Wellingborough Chamber of Commerce consider the following sites to be unsuitable: Part of Croyland Park; Dale End Park; 124b Garden Midland Road; Doddington Road Cemetery Allotments; Land Adj. Christchurch House; and Land off Irthlingborough Road.</li> </ul>	
<p><b>Issue 57: Urban Housing – Potential Sites</b></p> <p><b>Are there any additional non-strategic sites that should be considered for housing?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>

- Whitworth Holdings Ltd has put forward a roughly triangular site bounded by Doddington Road to the south, Millers Lane to the north-west and The Merry Miller Public House to the north-east. It covers 0.46 ha and could provide for 10 to 12 dwellings.
- Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group have queried whether the site currently occupied by the Council Tower Blocks in front of Croyland Abbey could be considered for a potential development site in the future together with any other council owned buildings particularly in the town centre.
- Hampton Brook has put forward Prospect Park – Land to the West of Wilby Way, Wellingborough. It comprises some 48 hectares (gross) and offers an opportunity for a substantial mixed-use development.
- Ashtenne Industrial Fund has suggested No. 90 Denington which has been vacant for several years and is no longer fit for purpose

Specific sites put forward have been assessed for their suitability, availability and developability. This is presented in a background paper.

It is not necessary however to consider every potential site as there will still be an opportunity for additional sites to be developed as windfall sites subject to suitable criteria based policies.

#### **Issue 58: Urban Housing - Site Specific Policies**

**Should the plan include any site specific policies to set development principles for allocated housing sites?**

##### **Options**

- A. No, there are sufficient policies in the Joint Core Strategy to guide how development should take place**
- B. No, any detail required should be included in design briefs or Supplementary Planning Documents (SPD)**
- C. Yes, the local plan should identify key development principles which relate directly to the characteristics of the site and its surroundings**

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Irchester and Lt Harrowden Parish Councils consider that the plan should identify key development principles for sites.</li> <li>• Hampton Brook and Wellingborough Chamber of Commerce have suggested that any detail required should be included in design briefs or Supplementary Planning Documents (SPD).</li> <li>• English Heritage (Historic England) supports either design briefs/ SPDs / or the plan including key development principles, depending on the size of the site, in order to secure well-designed development and to address any site-specific historic environment matters.</li> <li>• Hallam Land Management have commented that any site specific policies to be included in the Plan must be 'sound' in accordance with the Framework, and be justified by evidence, demonstrated to be deliverable, and consistent with the policies of the Framework In addition SPDs should only be used to help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.</li> </ul>	<p>The sites which have been identified have been assessed to determine whether there are any site specific issues that would not be picked up by generic policies such as Policies 2, 3, 4 and 8 of the JCS. As a result a number of site specific policies are proposed.</p>
<p><b>Issue 59: Housing Potential in Finedon</b></p> <p><b>Are the sites listed in Table 10.6 suitable, available and developable?</b></p> <p><b>Issue 60: Housing Potential in Finedon</b></p> <p><b>When are the sites listed in Table 10.6 likely to be developed and are they likely to deliver the entire capacity within the plan period?</b></p>	

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Northamptonshire County Council Highways have said that whilst the sites proposed are relatively small in nature in Finedon, their cumulative impact particularly on the A45/A6 Chowns Mill junction and on A510 Wellingborough Road in particular should be assessed as part of determining whether they are suitable.</li> <li>• The British Steel Pension Fund has supplied deliverability evidence for the following sites: Land West Burton Rd, Finedon; land East Burton Rd, Finedon HF11; Land Station Rd, Site HF9; Land Summerlee Rd, Finedon, Site HF8; land south of Kenmuir Rd, Finedon; Land North Thrapston Rd, Finedon, HF13; Land at Irthlingborough Rd, Finedon (HF7); Land South of Milner Rd, Finedon, HF15; Land South Thrapston Rd; and Land at Ewenfield Rd, Finedon</li> <li>• English Heritage (Historic England) have commented that Finedon 6, land north of Mackworth Drive is situated close to a highly significant set of historic buildings, including the Grade I Church of St Mary, Grade II* Vicarage/ Bede House and buildings associated with Finedon Hall (Grade II). This does not mean that development of this site is inappropriate, but it should be the subject of a development brief and/ or a policy setting out development principles.</li> <li>• Anglian Water can advise on whether the proposed development sites may have an impact on existing infrastructure (including water recycling centres, pumping</li> </ul>	<p>All sites have been assessed for their suitability, availability and developability. This is presented in a background paper. The assessment has taken account of the comments made on individual sites including information provided by landowners and promoters.</p> <p>The cumulative impact of the sites will not need to be assessed as not all will be allocated, only sufficient to meet the target identified in the JCS.</p>

stations, sewers, water mains) owned by Anglian Water	
<b>Issue 61: Housing Potential in Finedon</b>	
<b>Are there any additional sites in or around Finedon that should be considered for housing? If so, please specify where</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>The British Steel Pension Fund has supplied deliverability evidence for two additional sites: Land off Kenmuir Road and Land south of Kenmuir Road</li> </ul>	These sites have been added to the assessment.
<b>Issue 62: Rural Housing – Assessment Methodology</b>	
<b>Is the assessment methodology set out in the background paper Wellingborough Rural Housing Allocation Methodology and Site Selection appropriate?</b>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>Irchester Parish Council, Great Doddington Parish Council, Bowbridge Land Limited, a resident, Wellingborough Chamber of Commerce and R W Beaty (Farms) Limited support the proposed assessment methodology.</li> <li>English Heritage (Historic England) is happy that the assessment methodology includes consideration of the effect of the development proposals on landscape and cultural heritage.</li> <li>Persimmon Homes consider that in the rural areas there should be an extra level of assessment regarding the sustainability of the settlement and the access to services and facilities offered. Some settlements with no services</li> </ul>	<p>The assessment methodology has been revised taking account of the comments made. In particular a more detailed assessment of accessibility has been included. The revised methodology is available in a background paper to support the identification of preferred sites.</p> <p>The overall sustainability of settlements is covered in a background paper on the settlement hierarchy.</p>

<p>should be ruled out from further development, and any local needs arising in these villages could be met in nearby settlements.</p> <ul style="list-style-type: none"> <li>• Hampton Brook have said that If this methodology is also to be applied to those other villages not named in the plan, then criterion 1 (Accessibility) should acknowledge wider accessibility beyond the village itself and recognise that some smaller settlements are sustainably located next to larger centres – in the case of Great Doddington the settlement lies just 2km from Wellingborough urban area, and 4km from the town centre.</li> <li>• Anglian Water welcomes the reference made to utility provision. Water supply and wastewater infrastructure should be form part of this criteria.</li> </ul>	
<p><b>Issue 63: Housing Outside the Four Named Villages</b></p> <p><b>Is there a need for the part 2 local plan to allocate any sites in the remaining rural area or will sufficient sites be delivered through windfall sites, exceptions sites and neighbourhood plans to meet local needs?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester, Little Harrowden and Great Doddington Parish Councils, Wellingborough Chamber of Commerce and a resident do not consider there is a need to allocate any further sites in the rural area</li> <li>• A resident considers it is not necessary to allocate sites in Great Doddington.</li> <li>• Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group note that Little Irchester has been</li> </ul>	<p>It is considered that sufficient sites will be delivered through windfall sites, exceptions sites and neighbourhood plans to meet the needs of individual settlements and the overall rural housing requirement in the JCS. Windfall sites are expected to continue at similar rates to historic rates. The exceptions sites policy in the JCS allows flexibility for sites to come forward adjacent to settlements to meet identified needs. The Council is committed to a rolling programme of preparing Housing Needs Surveys for</p>

included in these figures – but housing allocation will be outlined by the NHP that covers the Parish of Irchester.

- Francis Jackson Homes consider there should be serious consideration to identifying a small number of specific deliverable, available, achievable and developable sites in the rural area.
- Persimmon Homes Midlands consider allocations should be made for the identified housing requirement for the 'Rural housing (outside the four named villages)' tier. Based on a quick assessment of services, they consider that the villages that are likely to fall into the sustainable category would include Bozeat and Great Doddington, with the potential for Sywell, Isham and Wilby to also be considered.
- Hampton Brook suggests that the larger villages in the next tier, specifically Great Doddington, should benefit from specific allocations.
- The following sites have been put forward for consideration:
  - land off Hillside Close, Bozeat
  - Wyevale Garden Centres nr Great Doddington
  - land at Hardwick Road, Little Harrowden (R W Beaty (Farms) Limited)
  - east of London Road, Little Irchester (Bowbridge Land Limited)
  - Sywell Grange Farm
  - off Station Road, Earls Barton
  - Land between and to rear of 145 and 153 Station Road, Earls Barton

each of the villages and will work with the parish councils and housing providers to deliver suitable sites.

There is therefore not considered to be a need to assess sites in the rural area outside of the four named villages in the JCS.

<ul style="list-style-type: none"> <li>○ the walled garden at Ecton (Trustees of Ecton Estate)</li> <li>○ Northampton Road Earls Barton (Trustees of Ecton Estate)</li> <li>○ Nene Milling Site- Bozeat (Church Farm)</li> <li>○ Land east of Mears Ashby (Oxford University Endowment Management)</li> <li>○ Land to the west of Park Farm Way, Wellingborough (Oxford University Endowment Management)</li> <li>○ Land north of Wollaston</li> <li>○ Land at Little Irchester (East of London Road)</li> </ul>	
<p><b>Issue 64: Higher Levels of Housing Growth in the Rural Area</b></p> <p><b>Are there any particular local needs or opportunities in the rural area that could be addressed by identifying higher levels of housing growth than identified in Table 10.2?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Generally developers such as Hampton Brook, Persimmon and Gladmans considered there was a need to identify higher levels of housing growth in the rural areas, particularly in order to meet the borough’s full objectively assessed housing needs, and ensure a sufficient supply of deliverable and developable housing land, as the Council cannot currently demonstrate a five-year housing land supply.</li> <li>• Hampton Brook suggest a site that lies off Top Farm</li> </ul>	<p>No specific needs such as open space or community facilities have been identified by communities which additional housing could help to deliver. Similarly no local opportunities such as underused sites within villages have been identified.</p> <p>The JCS provides sufficient flexibility to allow for local housing needs to be met through exceptions sites. Communities are also able to prepare Neighbourhood Plans should a particular local need or opportunity arise throughout the plan period.</p>

Lane, west of The Ridge, and extends to some 1.477 ha that could accommodate in the region of 40-50 dwellings.

- Barwoods consider at least 300 new dwellings are needed in Irchester to avoid a damaging reduction in the working age population of the village – and hence the socio-economic sustainability of the village.
- R W Beaty (Farms) Limited consider that villages with good facilities and close to a main Growth Town, such as Little Harrowden, should be considered as being suitable to deliver housing to contribute towards sustainably meeting this housing requirement and to provide for a choice of housing.
- The Trustees of Ecton Estates felt that there will be opportunities to deliver additional housing growth over and above the level Identified in table 10.2. This will allow villages to become more sustainable and to support the provision of services and amenities within those and should not restrict appropriate and sustainable development in the rural area
- Parish councils, such as Great Doddington, local residents, Irchester Lt Irchester and Knuston Neighbourhood Plan Steering Group and Wellingborough Chamber of Commerce consider that there are no specific community needs in the rural areas which needs to be addressed by further housing growth.
- Lt Harrowden Parish Council said ‘ Yes - improve and add more local facilities’ but did not clarify any further details

The intention of the plan is to meet the objectively assessed housing needs by primarily directing housing to the growth town of Wellingborough. This is fully in accordance with the Strategy in the JCS. As part of the preparation of the plan the council will need to demonstrate a five year housing land supply. Sufficient sites will be identified in the town in order to achieve this. There is therefore no need to identify higher levels of housing in the rural area in less sustainable locations.

**Issue 65: Affordable Housing**

**Will sufficient affordable housing be delivered to meet local needs through:**

- the emerging policy in the Joint Core Strategy to seek a percentage of private sector schemes to be affordable (draft Policy 30);
- the emerging policy on exception sites (draft Policy 13);
- Neighbourhood plans; and
- working with communities to produce local Housing Needs Surveys

**or are more locally specific policies required? If local policies are required what should they say?**

*Summary of Comments Received*

- Wellingborough Civic Society; Irchester, Lt Irchester & Knuston Neighbourhood Plan Steering Group, and Irchester, Lt Harrowden parish councils felt that affordable housing could be met through policies in the JCS and by working with communities to produce local housing needs surveys.
- Persimmon Homes suggested that the council would not be able to deliver sufficient affordable housing at present and should plan for a higher level of housing growth in the rural areas which will in turn help to deliver additional affordable housing.

*Officer Response*

It is considered that sufficient affordable housing will be delivered through the policies in the JCS, Neighbourhood Plans and the production of local Housing Needs Surveys. There is no need for any more locally specific policies.

**Issue 66: Housing Size**

**Are there any additional locally specific policies required in relation to housing size to supplement policies in the Joint Core Strategy? If so what should they say?**

*Summary of Comments Received*

- Irchester PC, Little Harrowden Parish Council and Bovis

*Officer Response*

No needs for any more locally specific policies have been

<p>Homes consider that there is no need for any specific policies in relation to housing size.</p> <ul style="list-style-type: none"> <li>• A local resident felt a local policy should be included in the plan regarding garage size.</li> <li>• A resident considers that the plan should support the Housing Plan by acknowledging the need for non-standard housing and should welcome the provision of supported living in the Borough.</li> <li>• Persimmons Homes consider that policy 30 of the JCS on Housing Mix and Tenure does not allow for sufficient flexibility of bedroom sizes and this may impact the deliverability of PBW.</li> <li>• Hallam Land Management point out that should the Council propose a specific policy requiring certain sizes of housing on new development, evidence of local demand will be required to inform such a policy.</li> </ul>	<p>identified.</p> <p>The National Planning Practice Guidance advises that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the Nationally Described Space Standard. This standard is already referred to in JCS policy 30.</p>
<p><b>Issue 67: Housing Accessibility</b></p> <p><b>Should the part 2 local plan seek to identify local evidence to support a policy which requires a proportion of new development to meet Category 3 of the nationally described accessibility standards?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester PC, Lt Harrowden PC, Wollaston PC, the Civic Society, a resident and Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group felt that the council should identify evidence to support a policy which requires a proportion of new homes to meet Category 3 standards based on viability of delivering the scheme. The Chamber of Commerce agreed however the</li> </ul>	<p>Local evidence on the need for Category 3 (wheelchair user dwellings) has been sought. In view of the difficulties in projecting future needs it is considered that Policy 30 of the JCS provides sufficient flexibility to enable the council to negotiate for a proportion of Category 3 dwellings based on evidence of needs at that time. A local policy setting a specific target is not therefore proposed.</p>

<p>percentage should be relatively low and based on viability of delivering the scheme.</p> <ul style="list-style-type: none"> <li>• Bovis considered that additional policies are not required in the PBW. Persimmon explained that requiring a proportion to meet Category 3 will worsen the viability problem. The Part 2 Local Plan should therefore be clear in setting out the evidence, including justification in relation to viability, for any additional housing standards above those contained within the Building Regulations</li> </ul>	
<p><b>Issue 68: Housing for Older People</b></p> <p><b>Should the part 2 local plan have more locally specific policies to supplement the Joint Core Strategy to provide housing to meet the needs of older persons? If so what approach should be taken?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• A local resident felt that there is no provision for the elderly who might wish to be independent, not necessarily in a flat, but with some form of community activity.</li> <li>• Irchester PC and Lt Harrowden PC, Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group, Bovis and Persimmon felt there was no need for additional local policies.</li> <li>• The civic society though the plan should provide for extra care.</li> <li>• A local resident said it is important, that planning policy allow and encourage a diverse set of solutions to housing the elderly, solutions that would include smaller houses as well as apartments and care homes, possibly although</li> </ul>	<p>The overall need has been identified through the Strategic Housing Market Assessment (SHMA) and policy 30 of JCS supports provision to meet this need. Policy 30 encourages provision to meet specialised housing requirements including designated, sheltered and extra care accommodation and SUEs and other strategic developments should make specific provision towards meeting these needs. In view of the scale of need identified a local policy is proposed which sets a local threshold for negotiating for an element of dwellings to meet the needs of older persons.</p>

<p>not necessarily clustered together.</p> <ul style="list-style-type: none"> <li>The Chamber of Commerce consider that the Part 2 of the Local Plan should help to identify where elderly sheltered living and retirement homes would be acceptable and desirable. Set out the criteria and positively plan for where it would be advantageous to include elderly accommodation and what expectations the LPA has.</li> </ul>	
<p><b>Issue 69: Self-build housing</b></p> <p><b>Should the part 2 local plan include local policies to support self-build opportunities?</b></p> <p><b>Options:</b></p> <p><b>A. No, the Joint Core Strategy policy, together with the provision already made within Wellingborough East SUE and other government initiatives are sufficient to facilitate self-build.</b></p> <p><b>B. Yes, large scale housing development sites should be required to provide a proportion of plots for self-build.</b></p> <p><b>C. Yes, the council should identify specific sites on land within its ownership which should be offered for self-build.</b></p> <p><b>If you consider options B or C to be the most appropriate approach, how should the need for self-build plots be identified?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Irchester PC, Bovis Homes and Persimmon Homes thought that there was no need for further local policies on self-build (option A)</li> <li>Little Harrowden Parish Council, a local resident, Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group, Wellingborough Chamber of Commerce, and the civic society consider that the council should</li> </ul>	<p>The Self-build and Custom Housebuilding Act 2015 now requires the council to maintain a register of those seeking to acquire serviced plots and to have regard to it when carrying out its functions relating to planning, housing, the disposal of any land of the authority and regeneration.</p>

identify specific sites on land in its ownership (option C)

- A local resident Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group, Wellingborough Chamber of Commerce and the Civic Society suggest large scale housing should be required to provide a proportion of self-build (option B)
- A local resident commented that it is important that the housing produced through this initiative is of comparatively modest size for households of moderate means. Plot size and design guidance are required, so as to reflect this.
- Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group suggest a register should be developed for people who interested in this and it should be pushed with all as you clearly state not just the people who have money. Likewise, people would have to live in the house for XX numbers of years before they sell due to building and profiting from it. Perhaps a criteria aspect needs to be prepared to enable individuals to self-build.
- Wellingborough Chamber of Commerce suggest need should be identified through working with the local building industrial, establishing a list for interested parties and promoting opportunities through Council literature.

The register has now been established and to date no specific need has been identified. Policy 30 of the JCS supports opportunities for self-build projects and requires that SUEs and other strategic sites make serviced plots available. This is considered to be sufficient to meet local needs. A local policy is therefore not proposed.

**Issue 70: Gypsies, Travellers and Travelling Showpeople**

**Should the part 2 local plan include an additional locally specific policy above and beyond that proposed in the emerging Joint Core Strategy?**

**Options**

- A. Yes, there is a need for site specific allocations to be identified that provide additional pitches for later in the plan period (2022-2031) - if so how should this need be identified?;**
- B. Yes, there is a need for a criteria-based policy that is more specific to the context of the borough than the policy in the Joint Core Strategy;**
- C. No, the proposed policy in the emerging Joint Core Strategy provides sufficient detail and flexibility.**

*Summary of Comments Received*

- Irchester PC, Lt Harrowden PC, Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group and Derbyshire Gypsy Liaison Group consider that no additional policies are required
- Civic Society and Wellingborough Chamber of Commerce consider that there is a need for a criteria based policy that is more specific to the context of the borough.

*Officer Response*

It is considered that no additional policies are required in addition to policy 31 of the JCS. This criteria based policy provides sufficient guidance for any sites which need to be considered.

The council has already granted planning permission for enough sites to meet the needs identified in the most up-to-date Gypsy and Traveller Accommodation Assessment (GTAA). It is not possible at this stage to identify the needs for the period beyond 2022. This would need to be done as a review of the GTAA at a later point. Should any new need be identified at that time, this need could be met by identifying suitable sites with either the criteria based policy or through the next review of the local plan.

**Issue 71: Provision Of Land For Additional Floorspace In the Southern Area**

**What would be the best way of providing for the additional floorspace requirement for convenience retail for the plan period in the Southern Area?**

- A. Split the additional requirement between Wellingborough and Rushden and provide land to meet the proportionate need.**

**B. Not split the additional requirement between Wellingborough and Rushden**

**For (A), please explain how the split can be achieved and for (B), explain how this need would be met in part 2 of the local plan.**

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Northampton Council recommends that Wellingborough should seek reasonable alternatives for meeting future demand within the town centre and district centres in case Rushden Lakes seeks justification to expand in the future on the basis there are no identified sites under the sequential test.</li> <li>• Gregory Gray Associates consider that Wyevale Garden Centre is well placed to meet the additional 4,100 sq. metres of convenience floor space required in the southern regions over the plan period. The place is already in retail use with approximately 4,000 square metres floor space and benefits for good accessibility and can be used without undue harm to the character of the area.</li> <li>• Irchester, Lt Irchester and Knuston Neighbourhood Planning Steering Group support option A without elaborating how this can be achieved.</li> <li>• Bovis Homes states that retail policy should take account of accessibility to retail services when creating sustainable communities, particularly in respect of WEAST and possible future development on land to the east.</li> <li>• Wellingborough Chamber of Commerce supports option</li> </ul>	<p>WYG Town Centre and Retail Study shows that the council does not need to allocate further land for retail at present as there is no further capacity requirements to meet until 2021. However it is recommended that a retail review is undertaken once Rushden Lakes is fully established to understand any potential changes, this is in line with the JCS. This will be considered as part of the JCS review once Rushden Lakes is fully established.</p> <p>Garden centres are Sui Generis under the TCPA (Use Classes) Order 1987 (As Amended). They are not retail. This site would typically be out of centre, contrary to the JCS and the NPPF. It is unlikely the site will be allocated for A1 retail in the foreseeable future.</p> <p>The level of retail provision commensurate with the SUEs is already provided for in the approved master plan.</p>

<p>B but suggests the remainder should fall to Wellingborough if Rushden Lakes is implemented as permitted.</p>	
<p><b>Issue 72: Outstanding Retail Commitments</b></p> <p><b>Do you consider that any of the outstanding commitments listed above are unlikely to come forward for development within the plan period? Please state which sites and why?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester Parish Council does not consider any of the sites undeliverable.</li> <li>• Wellingborough Chamber of Commerce states that flexibility is required in the town centre in respect of retail and leisure development. It suggests 260s Sainsbury Stores is unlikely to be developed while the other (Wellingborough North, WEAST and 45-51 London Road) are either likely to have convenience or are under construction.</li> </ul>	<p>The committed sites have been assessed as part of the WYG Town Centre and Retail Study and it was considered that all of the developments could come forward and have therefore been included in the capacity calculations.</p>
<p><b>Issue 73: Current Allocations</b></p> <p><b>Should Site I (former PO Sorting Depot) and E2 (Market Square) be identified for retail development in the new plan?</b></p> <p><b>Options</b></p> <p><b>A. Yes, they should be identified for mixed use including retail.</b></p> <p><b>B. No, they should be allocated for uses other than retail.</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>

<ul style="list-style-type: none"> <li>• Irchester Parish Council; Little Harrowden Parish Council, Irchester and Little Irchester &amp; Knuston Neighbourhood Steering Group support option A (that they should be allocated for housing).</li> <li>• Wellingborough Chamber of Commerce questions whether this should still be necessary.</li> <li>• English Heritage (Historic England) requires that whichever development finally comes on these sites must respect the historic environment and/or enhance or better reveal the significance of the Conservation Area. It goes on to make wider comments about other sites within the Town centre Conservation Area which are addressed at Issue 4.</li> </ul>	<p>Noted.</p> <p>The sites have been assessed as part of the WYG Town Centre and Retail Study. According to the study a Site I should be allocated for mixed use and Site E should be continue to be the location of the towns market. The study also looked at several other sites in the town centre for allocation, the council will therefore also be allocating a site at High Street/Jacksons Lane and at Alma Street/ Cambridge Street for mixed use (including residential).</p>
<p><b>Issue 74: Current Allocations</b></p> <p><b>Are there any known constraints on Sites I (former PO Sorting Depot) and E2 (Market Square) which would prevent them from coming forward.</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester Parish Council does not consider that there are any constraints to the deliverability of the sites.</li> <li>• Wellingborough Chamber of Commerce suggests sites (I) and E2 are constrained by large but vacant telecom exchange and the church and layout of existing developments on Silver Street respectively. The Post Office site itself is a blight on this site. Both sites are unlikely to come forward due to land ownership and viability issues.</li> </ul>	<p>Noted.</p> <p>The WYG Town Centre and Retail Study considered the sites constraints and this has led to the appropriate allocation of the sites as described above.</p>
<p><b>Issue 75: Call for Additional Sites</b></p>	

**Do you have any other sites, not identified in the sections above, which would be appropriate for retail use? Please specify the site(s), the owner(s) (if known), and why you think it is a suitable location.**

*Summary of Comments Received*

- Irchester Parish Council and Little Harrowden Councils do not suggest any.
- Bovis Homes reiterates the need for accessible retail provision at WEAST, having regard to future expansion towards land to the east.
- Wellingborough Chamber of Commerce asks whether the Council's Tithe Barn Offices would be retail should they become excess to requirements.
- Gregory Gray Associates consider that Wyevale Garden Centre is well placed to meet the additional 4,100 sq. metres of convenience floor space required in the southern regions over the plan period. The place is already in retail use with approximately 4,000 square metres floor space and benefits for good accessibility and can be used without undue harm to the character of the area.

*Officer Response*

A neighbourhood centre is included in the WEAST masterplan. Any expansion of the development towards the east will be carefully planned so that there are adequate retail facilities commensurate with the scale of the proposed development.

Tithe Barn offices, are in use and not currently available for any other use.

Garden centres are Sui Generis under the TCAP (Use Classes) Order 1987 (As Amended). They are not retail. This site would typically be out of centre, contrary to the JCS and the NPPF. It is unlikely the site will be allocated for A1 retail in the foreseeable future.

**Issue 76: Town Centre Role**

**How can Wellingborough town centre adapt and diversify its retail role so it can operate successfully alongside Rushden Lakes?**

**Options**

**A. Protect the main shopping areas but allow other parts of the town centre to diversify to a variety of uses**

- B. Promote a leisure, cultural, heritage and evening role based on its theatre, public houses, restaurants etc.**
- C. Promote the town centre based on business activities and events linked with regeneration objectives**
- D. Some other role (please state).**

<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Three of the four respondents on this matter suggest a combination of options B &amp; C, which seek to promote leisure, cultural and heritage based on the current leisure quarter and the restaurants in the town and diversifying the town centre so it is more business orientated and concentrating on activities linked to regeneration. One respondent supports option B only.</li> </ul>	<p>The WYG Town Centre and Retail Study has identified the strengths and weaknesses of the town centre, the threats and opportunities that exist, particularly in respect of Rushden lakes, and recommend how the town centre can adapt and diversify in order to operate successfully alongside Rushden Lakes. Their recommendations include a centre that supports local independent shops, offers value for money, a centre focussed on alternative goods to clothes and fashion, and a centre that has a leisure and cultural offer based on an enjoyable public realm that visitors would like to spend time in.</p>
<p><b>Issue 77: Town Centre objectives</b></p> <p><b>Are objectives 3 to 10 (in Table 12.1 above) still relevant?</b>  <b>Should any other objectives be included for the town centre?</b></p>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Respondents suggest that the objectives are largely relevant. Nene Valley Nature Improvement Area (NIA) specifically cites objective no. 8. Another respondent suggests the town needs a new strategy to achieve these objectives in the context of Rushden Lakes while the Wellingborough Civic Society calls for a dedicated Town Centre Manager.</li> <li>• English Heritage (Historic England) supports objectives 4</li> </ul>	<p>The WYG Town Centre and Retail Study identified a strategy and role for Wellingborough Town Centre that is based on robust evidence. The study has not identified specific objectives, however the town centre section of the plan will identify objectives and policies that drive the strategy and role identified by WYG.</p> <p>In terms of town centre management, the Wellingborough BID is</p>

<p>and 6, subject to objective 4 being tweaked to comply with the NPPF as follows: <i>“To conserve the town centre’s heritage assets and ensure that new development within the conservation area or within the setting of heritage assets enhances or better reveals their significance”</i>.</p> <ul style="list-style-type: none"> <li>• The Cyclists Touring Club Right to Ride Network requires a review of objective 9 so that it becomes clear which cycle routes exist in town. It points out that the one way system is not helpful to cyclists cause and that the uphill of Sheep/Silver/High very unpleasant. In this regard, it supports the retention of cycle route from Upper Green/Broad Green in the Town Centre Area Action Plan (TCAAP).</li> </ul>	<p>responsible for this and has a BID Manager instead of a Town Centre Manager.</p>
<p><b>Issue 78: The Market</b></p> <p><b>Is the Market in the right location?</b></p> <p><b>Options</b></p> <p><b>A. Yes, the market should stay in its current location.</b></p> <p><b>B. No, the market should be moved closer to where most people shop</b></p> <p><b>C. An alternative to the above (Please state)</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Most respondents feel the market is in the right place, historically and practically. Wellingborough Civic Society and Wellingborough Museum suggest that all the market</li> </ul>	<p>The WYG Town Centre and Retail Study considered that the market was located in the best place as there is a considerable amount of footfall through the market square from the bus</p>

<p>stalls on Market Street and in Swansgate should be moved to the dedicated space. English Heritage (Historic England) says relocating could lead to a decline of the area, as such any proposed relocations must be accompanied by a regeneration plan for the site.</p> <ul style="list-style-type: none"> <li>• Irchester/Lt Irchester and Knuston Neighbourhood Plan Steering Committee made two suggestions for the market location. One being the whole area occupied by the library/market site/Whitehouse Yard and the store/bank bordered by Pebble Lane and Orient Way. They also suggested the area behind Silver Street could be considered for a mixture of the market, shops, offices, residential, etc. to bring vitality to that area.</li> <li>• This might mean relocating the library nearer to the Museum/Theatre to enhance the Cultural Quarter. It might also mean a creating a square with offices, shops and accommodation, perhaps even a Market Hall.</li> </ul>	<p>station to Swansgate Shopping centre and vice versa. The site is well connected to public transport. WYG recommended a need to improve layout, offer, operating hours and market management which is being considered by the councils Market Working Group.</p>
<p><b>Issue 79: Criteria for Defining Primary and Secondary Frontage Policies</b></p> <p><b>Is the criteria for defining primary and secondary frontage policies appropriate?</b></p> <p><b>Options</b></p> <p><b>A. Yes, the criteria for defining primary and secondary frontages is appropriate.</b></p> <p><b>B. No, the criteria for defining primary and secondary frontages is not appropriate. Please make suggestions about the most appropriate.</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Three out of four respondents, all Parish Councils,</li> </ul>	<p>The WYG Town Centre and Retail Study makes</p>

<p>consider the definition of primary and secondary frontages appropriate.</p> <ul style="list-style-type: none"> <li>Wellingborough Chamber of Commerce considers the definition inappropriate. It says more flexibility is required and any redefinition must be based on evidence.</li> </ul>	<p>recommendations as to the most appropriate definition of primary and secondary shopping frontages. This is based on a robust town centre health check which considers the level of vacancies, existing situation and trends in diversity of uses, commercial yields, commercial rents, etc. The outcome is clearly shown on a map. The resultant designation is sufficiently flexible to encourage future vitality and viability.</p>
<p><b>Issue 80: Calculating Street Level Frontage</b></p> <p><b>Which approach should the council use to calculate appropriate levels of uses within primary and secondary frontages?</b></p> <p><b>Options</b></p> <p><b>A. Calculations based on number of units</b></p> <p><b>B. Calculations based on frontage length</b></p> <p><b>C. Some other approach (please state)</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>Three respondents, all parish Councils, prefer option A but Wellingborough Chamber of Commerce suggests option B is the most appropriate.</li> </ul>	<p>The WYG Town Centre and Retail Study makes recommendations as to the most appropriate definition of primary and secondary shopping frontages. This is based on a robust town centre health check which considers the level of vacancies, existing situation and trends in diversity of uses, commercial yields, commercial rents, etc. WYG recommend that primary shopping frontages should comprise at least 70% A1 uses based on number of units.</p>

<b>Issue 81: Leisure and Cultural Quarter</b>	
<b>Should part 2 of the local plan seek to retain the Leisure Quarter and Cultural Quarter as defined on the proposals map in the TCAAP?</b>	
<b>Options</b>	
<p><b>A. Yes, the quarters identified on the TCAAP proposals map should be retained.</b></p> <p><b>B. Yes, but the quarters should be updated to reflect the two areas today and any future needs in these areas.</b></p> <p><b>C. No, there is no need to continue to identify leisure and cultural quarters in the local plan.</b></p>	
<i>Summary of Comments Received</i>	<i>Officer Response</i>
<ul style="list-style-type: none"> <li>• Most respondents support option B which requires the retention of cultural facilities but say this must be updated to reflect current circumstances. The Theatres considers that a cultural precinct will ensure that development in the vicinity is appropriate and supportive of cultural facilities. Incompatible uses like residential would raise issues of noise, vibration and access. Wellingborough Chamber of Commerce suggests the focus should be on leisure and entertainment and that flexibility is required so that other alternative uses can be accommodated where they are commercially viable.</li> <li>• Wellingborough Museum suggest option C and justify this</li> </ul>	<p>WYG Town Centre and Retail Study recommends that there is no need to continue to identify leisure and cultural quarters as these do not provide flexibility and may stifle opportunities for cultural and leisure developments in Wellingborough, which would not accord with WYG's suggested role and strategy for the town centre. The PBW will therefore encourage leisure uses across the town centre.</p>

<p>by saying a future cinema should not be located close to the Castle Theatre. It suggests the term Cultural Quarter is “elitist and off putting to the public”.</p>	
<p><b>Issue 82: Gaps in Provision of Facilities</b></p>	
<p><b>Is there a gap in the provision of certain leisure, entertainment and cultural facilities in the town centre, if yes please identify.</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• All six respondents point to a gap in the provision of a Cinema in the town centre.</li> <li>• Irchester/Lt Irchester and Knuston Neighbourhood Steering Committee also add that more restaurants are required and that the library needs to be moved closer to the cultural quarter to add vitality/vibrancy. It also suggests a community hub comprising town hall/library/council office in the centre and some workshops/offices/shops for business start-ups for artists to provide an “artesian approach to employment and the retail offer”.</li> </ul>	<p>As part of the WYG Town Centre and Retail Study a town centre health check, was undertaken, the results of which showed that although the centre is subject to some vulnerabilities, Wellingborough town centre is generally vital and vibrant with a good mix of uses, including leisure and cultural facilities.</p>
<p><b>Issue 83: Town Centre Boundary</b></p>	
<p><b>What streets do you think should be included in the town centre boundary?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester and Little Harrowden Parish Councils say the existing boundary in the TCAAP (Figure 8 in the Issues and Options Document) should be retained. The Irchester/Lt Irchester/Knuston Neighbourhood Planning</li> </ul>	<p>WYG Town Centre and Retail Study recommends a consolidated town centre boundary that reflects the primary shopping area and main town centre uses in accordance with the NPPF.</p>

<p>Committee suggests this should be extended from Havelock Street into Regent Street to connect with Cannon Street.</p>	
<p><b>Issue 84: Other Priorities or Issues</b></p> <p><b>Are there any other issues or priorities for the town centre not identified above?</b></p>	
<p><i>Summary of Comments Received</i></p>	<p><i>Officer Response</i></p>
<ul style="list-style-type: none"> <li>• Irchester and Little Harrowden state that there are no other issue or priorities for the town centre. No other respondent has made another comment.</li> </ul>	<p>The WYG Town Centre and Retail Study has identified a number of other priorities for the town centre such as digitisation of the high street and fiscal incentives however these are not land use based and would be better addressed in a dedicated town centre strategy/ action plan.</p> <p>Officers have identified that policies on the public realm and shop fronts similar to those in the TCAAP would be useful and these have therefore been brought forward and updated in the emerging draft plan.</p>
<p><b>Issue 85: Sustainable Urban Extensions</b></p> <p><b>Is there a need to identify the SUEs on the policies map?</b></p> <p><b>If so, which boundary should be used to identify the SUEs on the policies map?</b></p> <p><b>Options</b></p> <ul style="list-style-type: none"> <li><b>A. The area which currently has planning permission.</b></li> <li><b>B. The area which is likely to be developed within the plan period.</b></li> <li><b>C. The full extent of the developable area, which would include some land likely to be developed beyond the plan period.</b></li> </ul>	

<i>Summary of Comments Received</i>		<i>Officer Response</i>	
<ul style="list-style-type: none"> <li>• Irchester PC, Cyclists Touring Club Right to Ride Network, consider that the full extent of the developable area should be shown on the policies map.</li> <li>• Lt Harrowden PC considers that either the full extent of the developable area or the area likely to be developed in the plan period should be shown on the policies map.</li> <li>• English Heritage (Historic England), Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group and Bovis Homes suggested that the policies map should show B, the extent of land to be developed within the plan period and also C, any land likely to be developed beyond the plan period.</li> </ul>		<p>Development principles have been identified for the SUES and therefore the area these policies relate to are shown on the policies map. The boundaries relate to the area with planning permission and the areas that have been masterplanned. The full extent of the developable area is a strategic matter for the next review of the JCS.</p>	
<p><b>Issue 86: Development Principles for the Sustainable Urban Extensions</b></p> <p><b>Should the part 2 local plan identify site specific development principles for the SUEs?</b></p> <p><b>Options</b></p> <p><b>A. No, the Joint Core Strategy will have sufficient general policies to guide development</b></p> <p><b>B. No, but general principles should be set out in Development Briefs or Supplementary Planning Documents</b></p> <p><b>C. Yes, site specific development principles for each SUE should be set out in the local plan</b></p>			
<i>Summary of Comments Received</i>		<i>Officer Response</i>	
<ul style="list-style-type: none"> <li>• Irchester PC, Lt Harrowden PC, a resident, English Heritage (Historic England), Environment Agency Persimmon and Cyclists Touring Club Right to Ride Network consider that site specific principles should be set out in the plan.</li> <li>• English Heritage (Historic England) considers that one of</li> </ul>		<p>Development principles are identified for the SUEs to supplement policies in the JCS. This will assist in dealing with any future amendments to the agreed master plans and the determination of reserved matters applications. It will also assist with dealing with applications for areas of land not covered by the initial outline applications.</p>	

the principles highlighted for Wellingborough North (Upper Redhill) should be the protection of the setting of the village of Great Harrowden and the Great Harrowden Hall registered park and garden.

- Irchester, Lt Irchester and Knuston Neighbourhood Plan Steering Group consider principles should be set out in Development Briefs/SPD and the local plan.
- St Modwen (Development Partner with Bovis to deliver all non-residential elements of this scheme) wish to engage further with the Council on this point. We are keen to ensure that the emerging Local Plan provides support for the principles of the permitted scheme, and sufficient flexibility to allow the scheme to respond to the evolving property market conditions.
- Bovis have commented that the PBW should not seek to reinvent what has already been approved or reopen matters that have already been addressed in the JCS. It needs to set out policies (without repeating those already set out in the JCS) that will guide specific emerging proposals (e.g. the type and quantum of development, public open space & infrastructure requirements etc.) and facilitate their delivery, but not be so detailed that it seeks dictate matters that should properly addressed through the development management process.