

Item No: 6

Date: 20 December 2012

**WEST NORTHAMPTONSHIRE
JOINT STRATEGIC PLANNING COMMITTEE**

**West Northamptonshire Joint Core Strategy
- Approval to Submit for Examination**

REPORT OF THE HEAD OF THE JOINT PLANNING UNIT

1. Purpose

1.1 The purpose of this report is:

- a) To consider the general conformity and consistency between the Regional Strategy for the East Midlands and the Joint Core Strategy in the light of the completion of an evaluation assessment of the general conformity and consistency between the policies of the Joint Core Strategy and the policies of the Regional Strategy that apply in the West Northamptonshire area and the resulting planning judgement based conclusion (Assessment attached as Appendix 1 to this report);
- b) To provide an Addendum to the Summary of the Main Issues Raised by the Representations to the Pre-Submission Joint Core Strategy and the Joint Planning Unit's Response to the Representations (Attached as Appendix 2 to this report);
- c) To provide a summary of the Proposed Changes to the Pre-Submission Joint Core Strategy representations stage (Regulations 19 and 20) including the requirements of the Regulations and how these have been met (Attached as part of Appendix 3 to this report);
- d) To provide a quantitative analysis of the representations received to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy including details of the total number of representations, and whether the representations concerned legal compliance and/ or soundness, and what aspect of soundness (Attached as part of Appendix 3 to this report);
- e) To provide a factually based summary of the main issues raised by the representations to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy (Attached as Appendix 4 to this report);
- f) To confirm what action, if any, needs to be taken on the representations received to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy;

- g) To seek approval to submit the Joint Core Strategy and its supporting documents to the Secretary of State for Examination in the light of the Strategy being considered to be in general conformity and consistency with the Regional Strategy and in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012; and
- h) To seek agreement to the process that will operate across the partnership should minor modifications to the Joint Core Strategy arise or be suggested during the Public Examination process in order to ensure the Examination operates in an efficient and effective manner.

2. Recommendations

2.1 That the Joint Strategic Planning Committee:

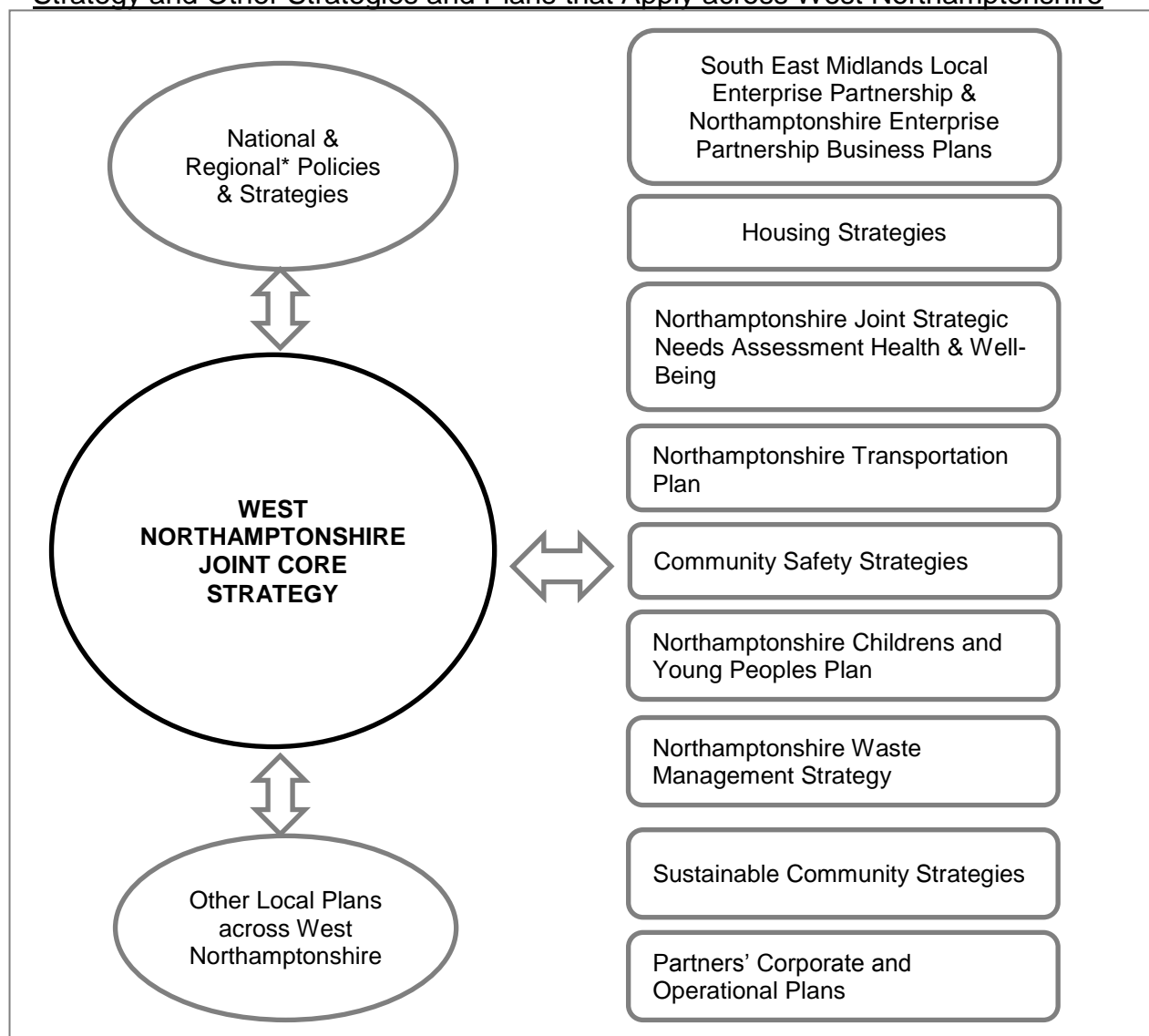
- 1) Agrees that, following the completion of the evaluation assessment that has led to a planning judgement based conclusion, the Joint Core Strategy is in general conformity with and is consistent with the East Midlands Regional Strategy (Assessment attached as Appendix 1 to this report);
- 2) Notes the Addendum to the Summary of the Main Issues Raised by the Representations to the Pre-Submission Joint Core Strategy and the Joint Planning Unit's Response to the Representations (Attached as Appendix 2 to this report);
- 3) Notes the summary of the Proposed Changes to the Pre-Submission Joint Core Strategy representations stage (Regulations 19 and 20) including the requirements of the Regulations and how these have been met (Attached as part of Appendix 3 to this report);
- 4) Notes the quantitative analysis of the representations received to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy (Attached as part of Appendix 3 to this report);
- 5) Notes the factually based summary of the main issues raised by the representations to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy (Attached as Appendix 4 to this report);
- 6) Agrees that no further action be taken in response to the representations received to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy;
- 7) Approves the Submission of the Joint Core Strategy and its supporting documents to the Secretary of State for Examination in the light of the Strategy being considered to be in general conformity with and consistent with the Regional Strategy and in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012; and
- 8) Agrees that, post Submission, should modifications of a minor nature arise during the Public Examination, the Head of the Joint Planning Unit will have delegated authority to raise them with relevant partner Council Director(s)

for them to raise with relevant senior Councillors in the Partnership: following consultation with the Chair of the Joint Strategic Planning Committee, the response will then be fed back by the Head of the Joint Planning Unit into the Public Examination.

3. Overview of the Joint Core Strategy Process to Date

3.1 The Joint Core Strategy will be the long term strategic plan for the development of Daventry District, Northampton Borough and South Northamptonshire administrative areas – it deals with the big picture of what will happen in the future. It is a spatial policy document, which means it deals with places and the activities that happen within and between them. The Joint Core Strategy is the priority planning document and all subsequent documents must reflect what it says. The Joint Core Strategy is also fundamental to ensuring the co-ordination and delivery of other services and related strategies as shown on Figure 1 below. This is not an exhaustive list; it is for illustrative purposes only and does not include all the key relationships. The ‘other’ strategies are in no particular order.

Figure 1 – Indicative Relationships between the West Northamptonshire Joint Core Strategy and Other Strategies and Plans that Apply across West Northamptonshire



*Note: Regional policy will apply up to the revocation of the Regional Strategy in accordance with current Government policy.

- 3.2 At its meeting on 31 January 2011 the West Northamptonshire Joint Strategic Planning Committee approved the publication of the Pre-Submission version of the West Northamptonshire Joint Core Strategy for the statutory six weeks representations period in accordance with the then Regulations 27 and 28. The content of the Pre-Submission Joint Core Strategy was informed by the Joint Core Strategy Issues and Options (2007), the Regulation 25 consultation (2009) and the Emergent Joint Core Strategy consultation in 2009, as well as the collection of a wide ranging evidence base and on-going work with technical bodies.
- 3.3 At its meeting on 25 July 2011 the West Northamptonshire Joint Strategic Planning Committee formally received the quantitative analysis of and the summary of the main issues raised by the representations received to the Pre-Submission Joint Core Strategy.
- 3.4 At its meeting on 16 July 2012 the West Northamptonshire Joint Strategic Planning Committee approved the Proposed Changes to the Pre-Submission version of the West Northamptonshire Joint Core Strategy for the statutory six week representations period together with an additional two week advance publicity period to take account of the fact that the representations period coincided with the summer holiday period. The Proposed Changes to the Pre-Submission Joint Core Strategy were prepared in the light of the representations to the Pre-Submission Joint Core Strategy; changes to national planning policy, particularly in terms of the National Planning Policy Framework (NPPF); and the evidence base.
- 3.5 The Proposed Changes included the presumption in favour of sustainable development and overall, sought to ensure that the Joint Core Strategy was now in full accordance with the NPPF. The Proposed Changes did not go to the heart of the plan but were considered necessary to ensure the Strategy is sound. The vast majority of the Proposed Changes were simply to factually update the plan or to correct minor drafting errors and these are termed Minor Proposed Changes. However, some of the changes were more important, although they still did not change the overall strategy or the direction of the plan, these are termed Significant Proposed Changes.

4. Update on the National Context

- 4.1 Members will be aware that the Localism Act provides for the abolition of regional strategies outside London in a two stage process. The first stage, to remove the regional planning framework and prevent further strategies from being created, took effect when the Localism Act received Royal Assent on 15 November 2011. The second stage is to abolish the existing regional strategies by secondary legislation. It remains the Government's policy to lay Orders in Parliament to that effect as soon as possible, subject to the outcome of the environmental assessments process, which is in train.
- 4.2 A ruling of the European Court of Justice in March 2012 made it clear that the Strategic Environmental Assessment (SEA) Directive applies to a procedure for the total or partial revocation of a land use plan. In light of this, and following earlier consultation responses, the Government is updating the environmental reports and undertaking additional consultation.

4.3 At the time of writing, Environmental reports have been published for consultation relating to the following regional strategies:

- East of England;
- Yorkshire and Humber;
- South East;
- West Midlands;
- South West; and
- East Midlands.

The remaining reports are expected to follow shortly.

4.4 In terms of the East Midlands the Strategic Environmental Assessment of the Revocation of the East Midlands Strategy: Environmental Report was published for consultation by the Department for Communities and Local Government on 23 October 2012. The consultation closes on 19 December 2012. The Environmental Report is a consultation document on the likely significant environmental effects of revocation of the East Midlands Plan and the Regional Economic Strategy (which together form the Regional Strategy). The report succeeds the previous environmental report on the revocation of the East Midlands Plan which was consulted on between October 2011 and January 2012. At the end of the consultation period all consultation responses will be considered, including those already submitted during the earlier response period.

4.5 Regional strategies remain part of the statutory development plan until such time as they are abolished, sometimes referred to as revoked. In the light of this the Joint Core Strategy Local Plan must be in general conformity with and be consistent with the Regional Strategy for the East Midlands at the time the Joint Core Strategy is submitted to the Government for public examination, until such time as that Regional Strategy is revoked in accordance with current Government policy. Therefore, the Partnership preparing the Joint Core Strategy Local Plan has undertaken an evaluation assessment of the extent to which their Strategy is in general conformity with and is consistent with that Regional Strategy as required by section 24(1) (a) of the Planning and Compulsory Purchase Act 2004 and Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012. An assessment of the general conformity and consistency between the East Midlands Regional Strategy (known as the East Midlands Regional Plan) and the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement that, together, form the Regional Strategy for the East Midlands, as it applies to West Northamptonshire, may be found at Appendix 1. This document takes each policy from the Regional Strategy and evaluates its general conformity and consistency with the Joint Core Strategy. Taken as a whole this document is an assessment of the general conformity and consistency between the Regional Strategy and the Joint Core Strategy. This assessment process has concluded that, in planning judgement terms, the West Northamptonshire Joint Core Strategy is in general conformity and is consistent with the Regional Strategy.

- 4.6 Local planning authorities can bring forward proposals (for example on housing targets) which have a local interpretation to them in their plans, based on their own sound evidence base, where this approach is justified by the local circumstances. That evidence base is likely to be more up to date than that included in the regional strategies as it is now some years since the preparation of those regional strategies: this also is the case with the East Midlands Regional Strategy. Each case will depend on its particular facts.
- 4.7 There are clearly risks associated with submitting the West Northamptonshire Joint Core Strategy Local Plan with a housing provision figure below the Regional Strategy target by 19.3%. The requirement for the Joint Core Strategy to be in general conformity and consistent with the Regional Strategy is established in legislation. Notwithstanding the risks, following evaluation as discussed in paragraph 4.5 above and in Appendix 1, it has been concluded, in planning judgement terms that Joint Core Strategy is in general conformity with and is consistent with the provisions of the Regional Strategy. Indeed, the reduced quantum of housing development planned within the Joint Core Strategy compared with the Regional Strategy is due to significant changes in market conditions since the Regional Strategy was prepared. This is something that Regional Strategy could not have foreseen when it was prepared and which would, it is considered, have been re-evaluated at a review of the Regional Strategy which, it is now generally agreed will not take place due to the on-going bringing into force of the Government's current reforms to the planning system.
- 4.8 It is also worth reflecting here once again on the point that the evidence base supporting the Joint Core Strategy is also more up to date than that which supports the Regional Strategy which was prepared a number of years ago. Indeed, in view of the recent "double- dip" recession, which could also not have been foreseen at the time the Regional Strategy was prepared, together with the on-going current economic climate it has become even more certain that the Regional Strategy housing target of 62,125 dwellings is not achievable. In the light of this scenario, the Joint Core Strategy is based on what is achievable and deliverable whilst ensuring that local housing need, together with community aspirations continue to be met. Indeed, demonstrating that the Regional Strategy housing target is not achievable is likely to form the heart of the discussions at the Joint Core Strategy Examination.

5. Representations to the Pre-Submission version of the Joint Core Strategy from Great Houghton Action Group

- 5.1 It has come to the attention of the Joint Planning Unit that the summary of the representations to the Pre-Submission Joint Core Strategy that was considered by the Joint Strategic Planning Committee at its meetings on the 25 July 2011 and the 16 July 2012 was inaccurate in omitting reference to the representation made by the Great Houghton Action Group relating to Paragraph 10.4 of the Pre-Submission version of the Joint Core Strategy. This omission gave the incorrect impression that this representation had not been considered by the Joint Planning Unit. In order to clarify this matter an addendum to the Summary of the Main Issues Raised by the Representations to the Pre-Submission Joint Core Strategy and the Joint Planning Unit's Response to the Representations in relation to the Introductory Text (which includes Paragraph 10.4) of Section 10

of the Pre-Submission Joint Core Strategy has been prepared and is attached to this report as Appendix 2.

6. Introduction to the Representations Stage to the Proposed Changes

The Statutory Stages

6.1 As a statutory requirement the Joint Core Strategy must be prepared in accordance with the relevant primary and secondary legislation, i.e. the Planning and Compulsory Purchase Act 2004, as amended, and the Town and Country Planning (Local Development) (England) Regulations 2012. These Regulations are very important because they prescribe the form and content of plans and the procedure to be followed in their preparation. The Regulations set out the statutory stages including the nature of public participation and the requirements for publication and submission of documents, including the length of the representations period.

6.2 The statutory stages are:

- Regulation 18 – Public Participation from Commencement to Proposed Submission (Previously Regulation 25)
- Regulation 19 – Publication of the Proposed Submission Development Plan Document (also known as Pre-Submission) (Previously Regulation 27)
- Regulation 22 – Submission of the Development Plan Document (Previously Regulation 30)
- Regulation 24 – Independent Examination of the Development Plan Document (Previously Regulation 34)
- Regulation 25 – Publication of the Inspector’s Report (Previously Regulation 35)
- Regulation 26 – Adoption of the Development Plan Document (Previously Regulation 36)

6.3 In relation to the Proposed Changes to the Pre-Submission Joint Core Strategy, Regulations 19 and 20 set out the nature of publication, how representations must be made and the length of the representations period.

The Requirements set out in the Regulations

6.4 Table 1 in Appendix 3 sets out what the Regulations require at the Proposed Changes to the Pre-Submission stage and how these requirements have been met. All the requirements of the Regulations were met.

Statements of Community Involvement

6.5 In addition to meeting the requirements of the Regulations the process of community involvement for the Joint Core Strategy must be in accordance with the three Statements of Community Involvement (SCIs) which have been adopted by Daventry District, Northampton Borough and South Northamptonshire Councils. The adopted SCIs set out the Partner Councils’ strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning

applications. The Statement of Community Engagement and Consultation that was published alongside the Proposed Changes to the Pre-Submission version of the Joint Core Strategy sets out how consultation has been undertaken throughout the document's preparation in accordance with the adopted SCIs.

Soundness Tests and the Duty to Co-operate

- 6.6 The primary purpose of the examination into a plan is to consider whether the Plan is “sound”, which essentially means “well-founded” and meets legal requirements. The examination also includes consideration of whether the “duty to co-operate” has been met. The duty to co-operate has been introduced through the Localism Act and it requires a local planning authority to co-operate with other local planning authorities and prescribed bodies - such as the Environment Agency; Natural England; and the Highways Authority - when preparing local plans.
- 6.7 In this context it is worth noting that there is strong on-going co-operation between the Partner Councils and neighbouring Councils, as well the prescribed bodies, in relation to the preparation of the West Northamptonshire Joint Core Strategy as well as the other Local Plans included in the up to date West Northamptonshire Local Development Scheme (June 2012).
- 6.8 Through the examination, soundness will be judged through four tests. The presumption is that the Plan is sound, unless as a result of considering the representations made and evidence considered at the examination, it is proved not to be. This means that the representations to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy had to relate to the four tests of soundness listed below, and/ or legal compliance.
- 6.9 To be “sound” a core strategy should meet the following four tests:
- a) “Positively prepared” means that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - b) “Justified” means that the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - c) “Effective” means that the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - d) “Consistent with national policy” means that the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

7. Representations Received to the Proposed Changes to the Pre-Submission Joint Core Strategy

- 7.1 The statutory six weeks period for representations to be made to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy was from Tuesday 14 August 2012 until Wednesday 26 September 2011. This included one additional day due to the Bank Holiday on Monday 27 August 2012.
- 7.2 At its meeting on 25 July 2012 the Joint Strategic Planning Committee agreed a two week advance publicity period in addition to the statutory six week period to take account of the fact that the representations period coincided with the summer holiday period.
- 7.3 A total of 1,011 individual representations were duly made by 121 individuals and organisations. Duly made representations are representations that were made within the representations period and address the soundness or legality of any part of the Proposed Changes to the Pre-Submission version of the Joint Core Strategy. 730 individual duly made representations were made to the Significant Proposed Changes and 281 individual duly made representations were made to the Minor Proposed Changes.
- 7.4 Table 2 in Appendix 3 of this report sets out the total number of duly made representations by Significant Proposed Change of the Joint Core Strategy. Table 3 in Appendix 3 of this report sets out the total number of duly made representations by Minor Proposed Change of the Joint Core Strategy. These tables also detail whether the representation is concerning legal compliance and/ or soundness, and what aspect of soundness. Table 4 in Appendix 3 of this report lists the specific and general consultation bodies and is referred to in Table 1 of the same appendix.
- 7.5 A total of 31 not duly made representations were received from 14 individuals and organisations. Of these 7 representations were received that did not address the soundness of any part of the Proposed Changes to the Pre-Submission version of the Joint Core Strategy. 22 representations were received after 5 pm on the 26 September 2012. 2 representations were received in the pre-publicity period. All of these respondents have been notified that their representations are not duly made. All not duly made representations will, however, in due course be sent alongside the duly made representations to the Planning Inspectorate for consideration as part of the formal examination of the Joint Core Strategy and it will be at their discretion as to whether they will be accepted.
- 7.6 All the representations have been logged and an acknowledgement sent to each respondent. All representations to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy are available to view on the Joint Planning Unit's consultation website or at the Joint Planning Unit's office in Northampton.

7.7 A factually based summary of the main issues raised by the representations to the Significant and the Minor Proposed Changes to the Pre-Submission version of the Joint Core Strategy has been prepared by the Joint Planning Unit and is attached to this report as Appendix 4. Table 1 is a summary of main issues raised in relation to the Significant Proposed Changes and Table 2 is a summary of the main issues raised in relation to the Minor Proposed Changes.

7.8 In the light of the representations received to the Proposed Changes to the Pre-Submission version of the Joint Core Strategy it is considered that no further action is required prior to submission to the Secretary of State for independent public examination.

8. Submission of the West Northamptonshire Joint Core Strategy

8.1 In accordance with the revised West Northamptonshire Local Development Scheme (LDS) approved by the Joint Strategic Planning Committee on 12 June 2012, the Joint Core Strategy will be ready for submission to the Secretary of State for independent public examination by 31 December 2012. However, due to the Christmas and New Year holidays it has been agreed with the Planning Inspectorate that submission itself will take place on 4 January 2013. The Planning Inspectorate have confirmed that this submission date will still be considered to be in accordance with the LDS.

8.2 The following documents taken together will constitute the Submission Joint Core Strategy:

- The Pre-Submission version of the Joint Core Strategy;
- The representations received to the Pre-Submission Joint Core Strategy in February and March 2011;
- The Proposed Changes to the Pre-Submission Joint Core Strategy; and
- The representations received to the Proposed Changes to the Pre-Submission Joint Core Strategy.

8.3 Regulation 22 also requires the following documents to be submitted alongside the Submission Joint Core Strategy:

- a) Sustainability Appraisal Report;
- b) Submission Policies Map, if the adoption of the plan would result in changes to the adopted policies map;
- c) Statement of Community Engagement and Involvement (covering the previous stages of the Joint Core Strategy preparation process);
- d) Copies of representations made in accordance with Regulation 20, i.e. at the Pre-Submission and Proposed Changes stages; and
- e) Such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the plan.

8.4 As soon as possible after submission the submitted documents listed as a) – c) in Paragraph 8.3 above must be made available for inspection and published on the Joint Planning Unit's website. In addition, a statement of the inspection arrangements must be sent to the general and specific consultation bodies that were previously invited to make representations to the Joint Core Strategy. Notice must also be given to anyone who asked to be notified when the submission has taken place.

- 8.5 An independent Inspector will be appointed by the Government to examine whether the Joint Core Strategy has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements and whether it is sound. The Inspector will take all of the submitted documents into account together with the supporting evidence base and hold a public examination into the Joint Core Strategy.
- 8.6 The Planning Inspectorate has been informed of the intention to submit the Joint Core Strategy. This will enable the allocation of a Planning Inspector. Whilst no date has been confirmed at this stage it is expected that the examination will take place in Spring 2013 with adoption of the Joint Core Strategy in October 2013.
- 8.7 As part of the public examination process prompt agreement regarding changes, or modifications, to the Joint Core Strategy of a minor nature may be sought by the Inspector. Equally, partners may wish to suggest modification(s) of a similarly minor nature into the examination process. Such minor modification(s) would be aimed at facilitating the efficient operation of the examination. In order to give effect to this, officers across the partnership have agreed that when and if such minor modification(s) arise the Head of the Joint Planning Unit will seek the advice of the partner Council(s) affected by the modifications through the relevant Director(s) representing those partner Council(s) in the partnership who, in turn, will raise the matter with the lead Councillor representative(s), as necessary. A response will then be fed back to the Head of the Joint Planning Unit. Following consultation between the Head of the Joint Planning Unit and the Chair of the Joint Strategic Planning Committee, the Head of the Joint Planning Unit will then feed the response back into the examination. The necessity for minor modifications of the type described could arise, for example, as a result of changes in national policy, to address representations made, or to deal with specific issues raised by the examination Inspector and will be aimed at ensuring that the Joint Core Strategy is more likely to be found sound as part of the examination process.
- 8.8 Significant changes, known as main modifications, would need to be reported to the Joint Strategic Planning Committee as well as being subject to consultation. For smaller changes, known as minor modifications, the Inspector is likely to incorporate them in his/ her written report, which will be reported to the Joint Strategic Planning Committee following the Examination. This written report will propose one of the following options:
- a) The Joint Core Strategy is sound and does not require any further amendment;
 - b) The Joint Core Strategy is sound but requires further amendment (known as modifications) before adoption; and
 - c) The Joint Core Strategy is unsound and cannot be adopted.

8.9 The first two outcomes will provide the opportunity for moving swiftly towards adoption, providing up to date policies for the whole of the West Northamptonshire area upon which to assess future planning applications. Although the recommendations contained in the Planning Inspector's report are not binding upon the Committee any departure would require clear justification.

9. Conclusion

9.1 The submission of the West Northamptonshire Joint Core Strategy marks a significant milestone. The preparation of the Joint Core Strategy has been a long, complex and at times controversial process. Once submitted the Joint Core Strategy will carry increasing weight as a material consideration when it comes to determining planning applications particularly regarding the parts of the Joint Core Strategy where there are no outstanding representations.

9.2 In terms of legal implications relating to this report, the content of this report and the associated recommendations to the Joint Strategic Planning Committee have been prepared in accordance with advice from Queen's Counsel.

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APPENDIX 1 – Assessment of Conformity and Consistency with the East Midlands Regional Plan and the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement

Please note – The East Midlands Regional Strategy is known as the East Midlands Regional Plan. All references in this appendix to the East Midlands Regional Plan should be read as the East Midlands Regional Strategy.

This schedule sets out each of the East Midlands Regional Plan/ MKSM SRS Part A policies, the relevant Joint Core Strategy policies and how they are in general conformity and are consistent with the Regional Plan requirements. The schedule also explains the justification for any areas of difference between the East Midlands Regional Plan/ MKSM SRS and the Joint Core Strategy.

References to the Joint Core Strategy are to the Pre-Submission version of the West Northamptonshire Joint Core Strategy and the Proposed Changes to the Pre-Submission version of the Joint Core Strategy.

Main Abbreviations Used*

DfT – Department for Transport

Emda – East Midlands Development Agency

EMRP – East Midlands Regional Plan

HS2 – High Speed Rail 2

JCS – Joint Core Strategy

LDS – Local Development Scheme

PPS – Planning Policy Statement

RTS – Regional Transport Strategy

SEMLEP – South East Midlands Local Economic Partnership

*Note – Other abbreviations are related where they occur in the text of this schedule.

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Policy 1 – Regional Core Objectives	The policy outlines Core Objectives for the Region which are intended to translate the broader policy context set out in the East Midlands Regional Assembly's Integrated Regional Strategy into a spatial strategy that will deliver sustainable development in the East Midlands.	The Joint Core Strategy's spatial vision and spatial objectives reflect the Regional Core Objectives. The spatial vision and spatial objectives provide specific direction to the West Northamptonshire wide thematic Policies and the Places Policies,	Not applicable.
Policy 2 – Promoting Better Design	The policy seeks to promote better design through continuously improved layout, design and construction of new development including in terms of CO2 emissions and providing resilience to climate change.	Policies S1, S10, S11, C1, C2, BN1, BN5, BN7, BN7A, and BN9 of the JCS reflect the content of Policy 2 of the EMRP.	Not applicable.
Policy 3 – Distribution of New Development	The policy identifies how development and economic activity should be distributed across the Region with the focus on the Principal Urban Areas, the growth towns, the Sub-regional Centres and then other settlements and the rural areas. The policy also seeks to ensure that priority is given to making the best use of previously developed land and vacant or under-used buildings in urban or other sustainable locations.	Policy S1 of the JCS reflects Policy 3 of the EMRP. As the references in the JCS's Spatial Portrait to London, Birmingham, Milton Keynes and Oxford show the influence of major urban areas outside the East Midlands on Northamptonshire has been taken into consideration in the preparation of the West Northamptonshire Joint Core Strategy.	Not applicable.
Policy 4 – Development in the Eastern Sub-Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 5 – Strategy for Lincolnshire Coastal Districts	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Policy 6 – Overcoming Peripherality in the Eastern Sub-Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 7 – Regeneration of the Northern Sub-Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 8 – Spatial Priorities in and around the Peak Sub-Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 9 – Spatial Priorities outside the Peak District National Park	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 10 – Managing Tourism and Visitors in the Peak Sub-Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 11 - Development in the Southern Sub-Area	<p>Northampton’s role and function as one of the Region’s five Principal Urban Areas (PUAs) should be strengthened by new public transport infrastructure and facilities.</p> <p>The role of Daventry as a sub-regional centre should be significantly strengthened.</p> <p>The role of small towns in the sub-area should be maintained through the retention of basic services and facilities, environmental improvements and the safeguarding of their rural hinterlands from encroachments by larger centres.</p>	<p>Policy S1 of the JCS reflects Policy 11 of the EMRP, setting out that development will be concentrated primarily in an adjoining the Principal Urban Area of Northampton.</p> <p>In addition, Policies C3 (Strategic Connections) and C4 (Connecting Urban Areas) also set out the improvements that are to be made to public transport connections in and around Northampton in order to strengthen its role as a PUA.</p>	Not applicable.

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
	<p>The quality of villages should not be degraded by inappropriate growth</p> <p>The natural & cultural heritage of the sub-area should be protected and enhanced in particular Special Areas of Conservation covering the Upper Nene Gravel Pits.</p> <p>In those parts of the sub-area influenced by major urban areas in adjoining regions provision for development should respect sustainable development principles</p>	<p>The role of Daventry is significantly strengthened through the policies contained within the Daventry chapter of the JCS.</p> <p>The role of the small towns of Towcester and Brackley are supported in the Brackley and Towcester chapters of the JCS. The retention of services and environmental improvements to the towns are discussed and supported by the policies contained within these chapters.</p> <p>The rural settlement hierarchy discussed in Policy R1 of the JCS will ensure that inappropriate growth does not occur.</p> <p>Objectives 4, 5, 14, 15 and 16 of the JCS seek to protect and enhance the natural and cultural heritage of West Northamptonshire</p> <p>Policies RC2, BN1, BN2, BN3 and BN5 of the JCS ensure that the natural and cultural heritage of the Southern Sub-Area is</p>	

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		<p>protected and enhanced.</p> <p>Policy BN4 of the JCS ensures that the Upper Nene Valley Gravel Pits are protected.</p> <p>Policy S10 of the JCS sets out the sustainable development principles that all development will be expected to meet.</p>	
Policy 12 – Development in the Three Cities Sub-Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 13a – Regional Housing Provision (excluding Northamptonshire)	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 13b – Housing Provision (Northamptonshire)	The policy sets out the total housing provision figure that the local planning authorities in West Northamptonshire should plan for between 2001-2026 of 62,125.	The Joint Core Strategy plans for 50,150 dwellings between 2001 and 2026. This is a reduction of 19.3% across West Northamptonshire.	Reduced quantum of development planned within West Northamptonshire due to significant change in market conditions. The 19.3% decrease in the West Northamptonshire target is felt to be within what could be considered general conformity with the EMRP.
Policy 14 – Regional Priorities for Affordable Housing	The policy states that LDFs, housing strategies and investment plans should have regard to the priorities identified in the Regional Housing Strategy and include policies seeking the provision of	Policies H1, H2, H3, H4, H5 and H6 of the JCS reflect Policy 14 of the EMRP.	Not applicable.

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
	<p>a mix of dwellings in terms of size, type, affordability and location having regard to the existing local stock. Local planning authorities should adopt affordable housing targets in line with the conclusions of the most up to date Housing Market Area Assessments. The policy includes an indicative affordable housing target for each Housing Market Area for the period 2006-2026 for monitoring purposes.</p> <p>The indicative affordable housing monitoring target for the West Northamptonshire Housing Market Area for 2006-2026 is 17,900.</p>	<p>It should be noted that the EMRP targets are indicative for monitoring purposes and that there is a clear expectation in Policy 14 of the EMRP that targets would be reviewed by Local Development Frameworks following completion of full up to date Housing Market Area Assessments.</p> <p>The affordable housing targets in Policy H2 of the JCS are based on the evidence set out the West Northamptonshire Strategic Housing Market Assessment (SHMA) (2010) and subsequent updates. The SHMA Technical Paper Update (July 2012) sets out the findings of the most recent update of the SHMA. This indicates a total affordable housing requirement (rented/ intermediate) of 10,100 dwellings.</p> <p>It is possible to compare this with the EMRP indicative targets by annualising the figures. The updated SHMA requirement equates to 673 per annum, whilst the EMRP indicative</p>	

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		<p>figures equate to 895 dwellings.</p> <p>The SHMA is based on more up to data such as house prices and household incomes and also reflects the reduction in the quantum of housing development.</p>	
<p>Policy 15 - Regional Priorities for Affordable Housing in Rural Areas</p>	<p>The policy requires new housing in rural areas to contribute to addressing affordability issues by providing appropriate levels of housing in suitable locations and creating sustainable rural communities through a choice of well designed homes. The policy also requires local authorities and housing providers to use all available policy mechanisms to provide affordable homes in rural areas.</p>	<p>Policy H2 of the JCS sets affordable housing targets of 40% for rural areas in Daventry District and 50% for rural areas in South Northamptonshire.</p> <p>Policy H3 of the JCS supports the provision of affordable housing to meet identified local needs in rural areas on “exception sites” and sets out the requirements and criteria for this type of development.</p> <p>Policy R1 of the JCS provides for a rural settlement hierarchy which will enable the provision of new homes, jobs and services needed in rural areas, whilst ensuring that new development is focused in sustainable settlements and protects the overall rural character of the area.</p>	<p>Not applicable.</p>

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Policy 16 - Regional Priorities for Provision for Gypsies, Travellers and Travelling Showpeople	<p>The policy requires local authorities and other relevant public bodies should identify land for additional pitch provision based on clearly evidenced assessments of need, working together across administrative boundaries where appropriate.</p> <p>The policy requires Local Development Frameworks (LDFs) to make provision for the minimum additional pitch requirements set out in Appendix 2 of the EMRP, taking account of the need arising from future growth beyond 2012 as set out in paragraph 3.1.18 of the EMRP.</p>	<p>Policy H7 of the JCS reflects the minimum additional pitch requirements set out in Appendix 2 of the EMRP for the three local planning authorities in West Northamptonshire updated as a result of the Northamptonshire Gypsies and Travellers Accommodation Assessment to 2017.</p> <p>The West Northamptonshire Gypsies, Travellers and Travelling Showpeople Local Plan will identify land for the additional pitch provision.</p>	Not applicable.
Policy 17 – Regional Priorities for Managing the Release of Land for Housing	<p>The policy requires local authorities, developers and relevant public bodies to work across administrative boundaries in all of the Regions Housing Market Areas (HMAs) to ensure that the release of sites is managed to achieve a sustainable pattern of development.</p> <p>The production of joint development plan documents is expected in a number of HMAs including West Northamptonshire.</p>	<p>The policies in the Joint Core Strategy will ensure the release of sites is managed to achieve sustainable development across the West Northamptonshire HMA. For example:</p> <p>Policy S1 of the JCS sets out that when assessing the suitability of sites priority will be given to making best use of previously developed land and vacant and under-used buildings.</p>	Not applicable.

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		<p>Policy S5 of the JCS has identified a number of sites within the area that will deliver the housing requirement sustainably.</p> <p>Policy S6 of the JCS also sets out that housing completions by location and type and the availability of land for housing in the future will also be monitored.</p>	
Policy 18 – Regional Priorities for the Economy	This policy requires local authorities in all parts of the region to work together with emda and other organisations with relevant responsibilities to encourage and foster the regional economy through implementing the Regional Economic Strategy. The policy notes that it will be especially important to raise skill levels, develop the service sector and high value manufacturing and create innovative businesses, so that the region is better placed to maintain economic competitiveness.	<p>The Regional Economic Strategy (RES) has been taken into consideration when preparing the JCS, as listed in Appendix 1 of the JCS - Plans and Strategies taken into account in the preparation of the JCS.</p> <p>The RES focus is reflected in the JCS Spatial Strategy through policies such as Policy S8 that addresses economic development in the SEMLEP Northampton Waterside Enterprise Zone in conjunction with relevant economic bodies including the Local Enterprise Partnerships. Paragraph 5.45 of the JCS notes that the SEMLEP Northampton Waterside</p>	Not applicable.

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		<p>Enterprise Zone will provide skilled jobs in manufacturing, research and development, and office sectors of the economy including high performance technology.</p> <p>Section 8, Economic Advantage, of the JCS sets out policies for the whole of West Northamptonshire relating to specific employment types and allocations reflecting both the RES and the local economic strategies.</p> <p>Section 8 of the JCS includes policies for strategic employment sites that form a key part of the regional economy including Daventry International Rail Freight Terminal (DIRFT) (Policy E4) and Silverstone Circuit (Policy E5). Other priorities for the regional economy are reflected in Policies E6 (Education, Skills and Training) and E7 (Tourism, Visitor and Cultural Industries) of the JCS.</p>	

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<p>Policy 19 – Regional Priorities for Regeneration</p>	<p>This policy requires regeneration activity to be focused on areas of greatest identified need including the Region’s Principal Urban Areas and Sub-Regional Centres.</p> <p>The policy also states that for regeneration to be successful concerted action is needed across the whole spectrum of local governance and local development documents should translate this into the action required locally.</p> <p>In addition regeneration of all priority areas must conform with the strategy of urban concentration set out in Policy 3 of the EMRP.</p>	<p>The JCS sets out an overall approach to development which includes the regeneration of areas that are showing the highest indicators of deprivation as well as ensuring the strategy does not contribute to further decline elsewhere. In addressing regeneration the JCS encompasses a generic approach, referring to specific location as examples of places which can benefit from regeneration initiatives. This approach provides the opportunity for a more detailed implementation of projects and initiatives through accompanying local plans and strategies which will address regeneration needs in more detail.</p> <p>Policy RC1 of the JCS sets out the strategic approach for community regeneration activity in West Northamptonshire throughout the plan period.</p> <p>The Places policies in the JCS set out specific priority areas for regeneration, i.e. Policies N11</p>	<p>Not applicable.</p>

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		and D4.	
Policy 20 – Regional Priorities for Employment Land	This policy requires local authorities, emda and sub-regional strategic partnerships to work together in housing market area groupings to undertake and keep up to date employment land reviews to inform the allocation of a range of sites at sustainable locations. The policy lists certain requirements of these allocations.	The West Northamptonshire Employment Land Survey (WNELS) was prepared in 2010 before the Pre-Submission JCS and has since been updated to July 2012 to support the Proposed Changes to the Pre-Submission JCS. The land identified in WNELS 2010 and 2012 shows sufficient scale, distribution and quality of land to meet the requirements of Policy 20 of the EMRP.	Not applicable.
Policy 21 – Strategic Distribution	<p>This policy requires local authorities, emda, Sub-Regional Strategic Partnerships, the Highways Agency and Network Rail to work together with private sector partners to bring forward sites for strategic distribution use in the Region with preference to sites in certain locations including the West Northamptonshire Housing Market Area.</p> <p>In allocating sites in local development documents this policy requires local authorities to give priority to sites which can be served by rail freight and operate as inter-modal terminals.</p>	<p>The West Northamptonshire Employment Land Study (WNELS) identifies that there is sufficient land available to meet the needs of rail and non-rail related freight, including land at Daventry International Rail Freight Terminal (DIRFT) 2 and in the Northampton Related Development Area (NRDA), without the need to allocate additional sites.</p> <p>Policy E4 of the JCS sets out support for the principle of further rail connected storage and distribution uses at Daventry International Rail</p>	Not applicable.

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	This policy also lists criteria that should be used when allocating strategic distribution sites.	Freight Terminal.	
Policy 22 – Regional Priorities for Town Centres and Retail Development	<p>The policy requires that local authorities, emda and Sub-Regional Strategic Partnerships should work together on a sub-area basis to promote the vitality and viability of existing town centres, including those in rural towns.</p> <p>Local planning authorities should within town centres bring forward retail, office, residential and leisure development opportunities, and any other town centre functions as set out in PPS6, based on identified need; prevent the development or expansion of additional regional scale out-of-town retail and leisure floorspace; and monitor changes in retail floorspace on a regular basis.</p>	<p>Objective 5 of the JCS seeks to support the regeneration of Northampton town centre by focusing high quality retail, employment, leisure and cultural development at the heart of Northamptonshire and supporting the delivery of the Northampton Central Area Action Plan.</p> <p>Objective 6 of the JCS seeks to support Daventry town centre through planning growth and infrastructure delivery.</p> <p>Objective 7 of the JCS seeks to support the rural service centre roles of Towcester and Brackley town centres to ensure their communities are self-sufficient sustainable places and the towns are the focus of services and facilities for surrounding villages.</p>	Not applicable.

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		<p>Policy S2 of the JCS identifies a hierarchy of centres and categorises Northampton as a Regional Town Centre, Daventry as a Sub-Regional Town Centre, and Towcester and Brackley as Rural Service Town centres recognising the different town centre roles performed by the towns. District and Local centres are also identified in Policy S2. Policy S2 requires that the vitality and viability of these centres must be maintained and enhanced commensurate with their role and function.</p> <p>Policies N1, N2, D2, T1, T2, and B1 of the JCS set out the detailed policies and measures that will be taken to achieve the JCS objectives for each of the town centres in West Northamptonshire.</p> <p>The Monitoring and Implementation Framework for the JCS, set out in Appendix 6 of the JCS, includes indicators and targets to monitor the implementation of Objectives 5,</p>	

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		6 and 7 and the associated Policies listed above. These indicators include the amount of new floorspace in each town.	
Policy 23 – Regional Priorities for Casino Development	The policy requires local authorities, emda and Sub-Regional strategic partnerships to work together to ensure proposals for new casinos benefit regeneration areas as identified in Policy 19 of the EMRP and that any such proposals are subject to a full assessment of social, economic and environmental impact.	<p>No proposals for new casinos licensed under the 2005 Gambling Act have been brought forward in West Northamptonshire since the EMRP was adopted in March 2009.</p> <p>None of the local authorities in West Northamptonshire are casino licencing authorities.</p> <p>Consequently, this is not a matter that the JCS does not explicitly addresses.</p>	Not applicable.
Policy 24 – Regional Priorities for Rural Diversification	This policy requires local authorities, emda and sub-regional strategic partnerships (SSPs) to work together to promote continued diversification and further development of the rural economy where this is consistent with a sustainable pattern of development and the environmentally sound management of the countryside.	<p>Policy R1 of the JCS sets out the spatial strategy for the rural areas including providing for employment needs within a rural settlement hierarchy.</p> <p>Policy R2 of the JCS supports proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses where they are of an appropriate scale for their location, respect the</p>	Not applicable.

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		<p>environmental quality and character of the rural area and protect the best and most versatile agricultural land.</p> <p>Policy R2 of the JCS also lists types of development which are considered to be acceptable including:</p> <ul style="list-style-type: none"> • The re-use of rural buildings; schemes for farm diversification; • Small-scale tourism; • Proposals that recognise the economic benefits of the natural and historic environment; • Expansion of businesses; • Small scale employment; and • The use of land for agriculture, forestry and equestrian activity. 	
Policy 25 – Regional Priorities for ICT	<p>This policy requires local authorities and Sub-Regional Partnerships to work with the private sector and relevant public bodies to:</p> <ul style="list-style-type: none"> • improve progressively the level of service from existing broadband infrastructure; • promote the take up and use of ICT 	Policy C1 of the JCS reflects Policy 25 of the EMRP. Policy C1 has been developed with Northamptonshire County Council who are the leading the Northamptonshire Superfast Broadband Project.	Not applicable.

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	<p>by businesses and the public and voluntary sectors; and</p> <ul style="list-style-type: none"> ensure that ICT provision for new development is considered at the design stage. 	<p>Policy C1 of the JCS states that “In order to achieve behavioural change the following measures will be introduced across West Northamptonshire: New development should be accessed by fibre to the premises (FTTP) Technology enabling access to superfast broadband and speeds of at least 30 megabits per second.”</p> <p>Policy C1 also states “Information communication networks, such as superfast broadband, will be supported across the whole of West Northamptonshire to reduce the need to travel and be a requirement for new developments.”</p>	
<p>Policy 26 – Protecting and Enhancing the Region’s Natural and Cultural Heritage</p>	<p>This policy requires that sustainable development should ensure the protection, appropriate management and enhancement of the Region’s natural and cultural heritage. This policy lists the principles that should be applied in relation to the protection and enhancement of the Region’s natural and cultural heritage.</p>	<p>Policy S10 of the JCS sets out the sustainable development principles that all development within the West Northamptonshire will be expected to meet reflecting Policy 26 of the EMRP.</p> <p>Policies BN1, BN2, BN4, BN5 and BN8 of the JCS ensure the protection and enhancement of</p>	<p>Not applicable.</p>

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		the natural, historic and cultural assets within West Northamptonshire in accordance with Policy 26 of the EMRP.	
Policy 27 – Regional Priorities for the Historic Environment	<p>The policy requires that the historic environment should be understood, conserved and enhanced in recognition of its own intrinsic value and its contribution to the Region’s quality of life.</p> <p>Across the Region and particularly in areas where growth or regeneration is a priority, development should promote sensitive change of the historic environment. To achieve this local planning authorities should:</p> <ul style="list-style-type: none"> • identify and assess the significance of specific historic assets and their settings; • use characterisation to understand their contribution to the landscape or townscape in areas of change; • encourage the refurbishment and re-use of disused or under-used buildings of some historic or architectural merit and incorporating them sensitively into regeneration schemes; • promote the use of local building materials; and 	<p>There are a number of policies in the JCS that reflect the requirements of Policy 27 of the EMRP:</p> <ul style="list-style-type: none"> • Policy S10 requires new development to protect, conserve and enhance natural and built environment and heritage assets; • Policy E7 supports tourism, visitor and cultural development proposals where this would not harm the quality of the built environment. The policy recognises the importance of historic town centres and historic visitor sites within the rural areas; • Policy BN1 requires new green infrastructure provision to reflect local character through the consideration of natural and cultural heritage features; • Policy BN5 sets out that development in areas of known historic or heritage 	Not applicable.

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
	<ul style="list-style-type: none"> recognise the opportunities for enhancing existing tourism attractions and for developing the potential of other areas and sites of historic interest as part of Green Infrastructure, having regard to potential impacts on biodiversity. 	<p>significance will be required to meet three objectives;</p> <ul style="list-style-type: none"> Policy BN6 supports the re-use of the former Ordnance Depot at Weedon to achieve the restoration of this important cultural and heritage site; Policy N1 requires new development in Northampton to protect the town heritage assets and historic assets through managed change; Policy D2 requires major office, retail and leisure development in Daventry town centre to take place in a manner that is appropriate to the conservation of its heritage assets; Policy T2 promotes the development of Towcester Town Centre and the Moat Lane Area to secure the preservation of the conservation area and heritage assets including the Bury Mount scheduled ancient monument.; and Policy B1 recognises the opportunities for heritage led regeneration in Brackley 	

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		town centre and ensure that new development conserves its historic character.	
Policy 28 – Regional Priorities for Environmental and Green Infrastructure	<p>This policy requires local authorities, statutory environment bodies and developers to work with the voluntary sector, landowners and local communities to ensure delivery, protection, enhancement of Environmental Infrastructure in the Region. Such infrastructure should contribute to a high quality natural and built environment and to the delivery of sustainable communities.</p> <p>Policy 28 of the EMRP also lists a number of actions that local authorities and those responsible for the planning and delivery of growth and environmental management across the Region should take.</p>	<p>The policies in Section 10, the Built and Natural Environment, of the JCS set out to deliver, protect and enhance environmental infrastructure within the West Northamptonshire area. This includes the protection and enhancement of West Northamptonshire’s Green Infrastructure (Policy BN1), Biodiversity (Policy BN2) and Historic Environment (Policy BN5). Specific policies on the River Nene Strategic River Corridor (Policy BN8) and the Upper Nene Valley Gravel Pits Special Protection Area (Policy BN4) also aim to increase access whilst protecting sensitive environmental assets. Figure 6 in the JCS shows the West Northamptonshire Green Infrastructure Networks.</p>	Not applicable.
Policy 29 – Priorities for Enhancing the Region’s Biodiversity	<p>This policy requires local authorities, statutory environmental bodies and developers to work with the voluntary sector, landowners and local</p>	<p>A review of the Regional Biodiversity Plan and the more recent Northamptonshire Biodiversity Action Plan was</p>	Not applicable.

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
	<p>communities to implement the Regional Biodiversity Strategy and to deliver a major step change increase in the level of biodiversity across the East Midlands. The policy lists the measures that should be taken to enhance the region's biodiversity.</p>	<p>undertaken to inform the preparation of the JCS and particularly Policy BN2.</p> <p>Policy BN2 of the JCS supports Policy 29 of the EMRP by supporting development that will maintain and enhance existing biodiversity designations and assets or deliver a net gain in biodiversity. Policy BN2 requires development that has the potential to harm sites of ecological importance to be subject to an ecological assessment and the policy lists the criteria that will be used to judge such an assessment. In addition Policy BN2 sets out the circumstances where mitigation, may be appropriate.</p>	
<p>Policy 30 – Regional Priorities for Managing and Increasing Woodland Cover</p>	<p>This policy sets out the regional priorities for managing and increasing woodland cover in detail. The overarching priority is for local authorities, statutory environmental bodies and developers to work with the voluntary sector, landowners and local communities to deliver a significant increase in woodland cover in the East Midlands in ways that respect local landscape character and support the</p>	<p>Policy BN3 of the JCS reflects Policy 30 of the EMRP. Policy BN3 supports measures to enhance and manage existing woodlands and create new woodlands in West Northamptonshire including along the Yardley Whittlewood Ridge. In addition the Policy BN3 supports opportunities to create new woodland to buffer,</p>	<p>Not applicable.</p>

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	implementation of the Regional Plan.	extend and re-link areas of ancient woodland which have become fragmented; whilst protecting aged or veteran trees and resisting further fragmentation or loss of ancient woodlands.	
Policy 31 – Priorities for the Management and Enhancement of the Region’s Landscape	This policy seeks to protect and enhance the Region’s natural and heritage landscapes. The policy lists the priorities to achieve this aim. The policy also requires local authorities to prepare landscape character assessments to inform the preparation of local development frameworks and the development of supplementary planning documents.	<p>Policy BN5 of the JCS seeks to sustain and enhance the character of the area including significant historical and locally important landscapes. The integration of landscape character work has also been used in Policies BN1, BN3 and BN8.</p> <p>Landscape character assessments have been produced for the whole of West Northamptonshire by the River Nene Regional Park Partnership in 2008 as part of the Northamptonshire Environmental Character and Green Infrastructure Suite. These assessments have been used to inform the preparation of the JCS. This evidence is listed in Appendix 2 of the JCS – Evidence base for the Joint Core Strategy.</p>	Not applicable.

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
<p>Policy 32 – A Regional Approach to Water Resources and Water Quality</p>	<p>This policy requires local authorities, developers, water companies, the Environment Agency and other relevant public bodies to work together to achieve the actions listed in the policy.</p> <p>The overall aim of the regional approach is to integrate water resources planning, water quality and wastewater infrastructure together with water efficiency, use of sustainable drainage and impacts on groundwater and designated nature conservation sites.</p>	<p>The JPU has worked together with the Environment Agency, the water companies in West Northamptonshire and the West Northamptonshire Development Corporation to produce the West Northamptonshire Water Cycle Strategy. The Phase 1 Strategy was published in 2009 and the Phase 2 Strategy was published in 2011.</p> <p>The West Northamptonshire Water Cycle Strategy (WCS) addresses the actions listed in Policy 32 of the EMRP.</p> <p>The conclusions of the WCS have been used to inform the location and phasing of development in the JCS.</p> <p>The conclusions of the WCS have been used to prepare the JCS and specifically reflected in the following policies of the JCS:</p> <ul style="list-style-type: none"> • Policy S10, in relation to water efficiency; • Policies INF1 and INF2 and the West Northamptonshire Infrastructure Delivery Plan in relation to water 	<p>Not applicable.</p>

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		<p>infrastructure;</p> <ul style="list-style-type: none"> • Policy BN7 in relation to flood risk and flood risk management including sustainable urban drainage systems; and • Policy N2 in relation to flood risk management within Northampton Central Area. <p>Policy BN7A of the JCS provides the overarching policy for water supply, quality and wastewater infrastructure. Policy BN7 of the JCS deals with sustainable drainage systems.</p>	
<p>Policy 33 – Regional Priorities for Strategic River Corridors</p>	<p>This policy recognises that the natural and cultural environment of the Strategic River Corridors in the East Midlands, including the Nene and its tributaries, should be protected and enhanced.</p> <p>This policy requires local authorities and other relevant public bodies to work together across regional boundaries to protect and enhance the multi-functional importance of strategic river corridors as part of the Region’s Green Infrastructure.</p>	<p>Policy BN8 of the JCS identifies the River Nene as a strategic river corridor and reflects the wording of Policy 33 of the EMRP.</p>	<p>Not applicable.</p>

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Policy 34 – Priorities for the Management of the Lincolnshire Coast	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy 35 – A Regional approach to Managing Flood Risk	<p>This policy requires local development frameworks and the strategies of relevant public bodies to take account of the potential impact of climate change on flooding and land drainage. The policy lists detailed requirements in relation to this overall requirement.</p> <p>The policy specifies the circumstances when development, alone or in conjunction with other new development, should not be permitted. The policy also specifies that such development may be acceptable on the basis of conditions or agreements for adequate mitigation measures.</p>	<p>The JPU has worked together with the Environment Agency, the water companies in West Northamptonshire and the West Northamptonshire Development Corporation to produce the West Northamptonshire Strategic Flood Risk Assessment Level 1 (published 2009), Daventry and South Northamptonshire Strategic Flood Risk Assessment Level 2 (published 2009) and the Northampton Strategic Flood Risk Assessment Level 2 (published 2010).</p> <p>The conclusions of the SFRAs have been used to inform the preparation of the JCS, including the location and phasing of development in the JCS.</p> <p>Policy BN7 of the JCS provides the overarching policy for flood risk reflecting Policy 35 of the EMRP and the conclusions of the Strategic Flood Risk</p>	Not applicable.

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		Assessments. Policy BN7A of the JCS deals with sustainable drainage systems.	
Policy 36 – Regional Priorities for Air Quality	<p>This policy requires local development frameworks and the strategies of relevant public bodies to:</p> <ul style="list-style-type: none"> • Contribute to reducing air pollution in the region; • Consider the potential effects of new developments and increased traffic levels on air quality; and • Consider the potential impacts of new developments and increased traffic levels on internationally designated nature conservation sites and adopt mitigation measures to address these impacts. 	Policy BN9 of the JCS requires proposals for new development to maintain and improve air quality, particularly in poor air quality areas, in accordance with national air quality standards and best practice. This policy will also apply to any proposals that could affect the Upper Nene Valley Gravel Pits Special Protection Area/ Ramsar Site.	Not applicable.
Policy 37 – Regional Priorities for Minerals	This policy sets out the regional priorities for minerals planning in the East Midlands.	The Northamptonshire Minerals and Waste Local Development Framework (NMWDF) addresses the matters listed in Policy 37 of the EMRP. The JCS reflects the minerals safeguarding areas identified in the NMWDF.	Not applicable.
Policy 38 – Regional Priorities for Waste Management	This policy sets out the regional priorities for waste planning in the East Midlands.	The Northamptonshire Minerals and Waste Local Development Framework (NMWDF) addresses the matters listed in Policy 38 of the EMRP.	Not applicable.

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		<p>Policy S10 of the JCS includes the requirement for new development to minimise resource demand and the generation of waste and maximise opportunities for reuse and recycling reflecting Policy 38 of the EMRP.</p>	
<p>Policy 39 – Regional Priorities for Energy Reduction and Efficiency</p>	<p>This policy requires local authorities, energy generators and other relevant public bodies to:</p> <ul style="list-style-type: none"> • promote a reduction of energy usage in line with the ‘energy hierarchy’; and • develop policies and proposals to secure a reduction in the need for energy through the location of development, site layout and building design. 	<p>Policy S10 of the JCS reflects Policy 39 of the EMRP requiring development to:</p> <ul style="list-style-type: none"> • be designed to improve environmental performance, energy efficiency and adapt to changes of use and a changing climate over its lifetime; • maximise use of solar gain, passive heating and cooling, natural light and ventilation using site layout and building design; and • maximise the generation of its energy needs from decentralised and renewable or low carbon sources. <p>In addition, Policy S11 of the JCS requires major development and sustainable urban extensions to contribute</p>	<p>Not applicable.</p>

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		<p>to reductions in carbon emissions and adapt to the effects of climate change through the sustainable development principles so as to minimise energy using sustainable design and construction. Policy S11 also requires all new residential developments (including mixed use) to achieve a minimum of Level 4 standard in the Code for Sustainable Homes and to achieve zero carbon standard from 2016 or national equivalent standard, including where appropriate a contribution to community or private energy funds. In relation to non-residential developments Policy S11 requires that all new non-residential developments over 500 SQM gross internal floorspace is required to achieve a minimum rating of at least BREEAM very good standard or equivalent or any future national equivalent zero carbon standard from 2019.</p>	
Policy 40 – Regional Priorities for Low Carbon Energy	This policy lists actions that local authorities and others should undertake to meet the regional priorities for low	Policy S11 of the JCS enables proposals to be brought forward for combined heat and power	Not applicable.

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Generation	carbon energy generation. The policy also lists factors that local planning authorities should consider when setting the criteria for onshore wind energy and new facilities required for other forms of renewable energy.	<p>and district heating infrastructure as well as encouraging the provision of low carbon and renewable energy. Paragraph 5.91 of the JCS explains that: 'In Sustainable Urban Extensions, opportunities for the development of combined heat and power and district level heating and district level heating and cooling networks should be taken where viable and appropriate'.</p> <p>Policy S11 of the JCS also sets out the criteria for the consideration of onshore wind and other forms of energy infrastructure and facilities.</p>	
Policy 41 – Regional Priorities for Culture, Sport and Recreation	<p>This policy requires local authorities and strategic sub-regional partnerships to work with local communities to develop cultural infrastructure plans to inform Local Development Frameworks and other relevant plans and strategies. Policy 41 lists the matters that cultural investment plans should include.</p> <p>Policy 41 also requires local authorities to work with County based Sport partnerships, Sport England and other relevant bodies to ensure that there is</p>	<p>Both the West Northamptonshire Cultural Investment Plan and the West Northamptonshire Sports Facilities Study were published in 2009.</p> <p>The content of both of the Cultural Investment Plan and the Sports Facilities Study have been taken into account in the preparation of the JCS and are reflected in Policies RC2 and</p>	Not applicable.

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	adequate provision of sports and recreational facilities consistent with the priorities for urban and rural areas, and the sub-area policies in the EMRP. Where appropriate, there should be joint working across administrative borders to ensure that identified need is met in the most effective manner.	the Infrastructure Delivery Plan.	
Policy 42 – Regional Priorities for Tourism	This policy requires local authorities, emda, Sub-Regional Strategic Partnerships and other relevant public bodies to seek to identify areas of potential for tourism growth which maximise economic benefit whilst minimising adverse impact on the environment and local amenity. This policy also lists measures that should be taken to support tourism growth.	Policy E7 sets out the circumstances where tourism, visitor and cultural development proposals will be supported reflecting Policy 42 of the EMRP.	Not applicable.
Policy 43 – Regional Transport Objectives	Policy 43 of the EMRP sets out the transport objectives for the Region: <ul style="list-style-type: none"> • To support sustainable development in the Region’s Principal Urban Areas, Growth Towns and Sub-Regional Centres; • To promote accessibility and overcome peripherality in the Region’s rural areas; • To support the Region’s regeneration priorities; • To promote improvements to inter-regional and international linkages that will support sustainable 	There are a number of policies in the JCS that reflect Policy 43 of the EMRP including: <ul style="list-style-type: none"> • Policy S1 which focuses development in the Northampton Principal Urban Area and the Daventry Sub-Regional Centre • Policy S5, Sustainable Urban Extensions (SUEs), which in locating the SUEs has optimised the use of non-car travel being on and/ or near public transport corridors; 	Not applicable.

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	<p>development within the Region;</p> <ul style="list-style-type: none"> • To improve safety across the Region and reduce congestion, particularly in the Region's Principal Urban Area's and on major inter-urban corridors; • To reduce traffic growth across the Region; and • To improve air quality and reduce carbon emissions from transport by reducing the need to travel and promoting modal shift away from the private car and encouraging and supporting innovative transport technologies. 	<ul style="list-style-type: none"> • Policy R3 sets out a Transport Strategy for the Rural Areas based on improved accessibility and sustainable transport; • Policy C1 seeks to change behaviour and achieve modal shift through a series of measures with modal shift targets set in the JCS; • Policy C2 requires that new development meet the modal shift targets in the JCS reducing the rate of traffic growth; • Policy C3 identifies key strategic connections and improvements to those connections; • Policy C4 identifies strategic public transport corridors and public transport interchanges, as well as improvements, required to achieve modal shift and reduce congestion and traffic pollution. Policy C5 seeks to enhance local and neighbourhood connections in order to support and improve access to services including within the rural areas and between the urban and rural 	

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		<p>areas.</p> <p>The JCS approach to reducing traffic growth is justified through its sequential approach to traffic modes that maximises non-car travel. This approach is in line with Paragraphs 3.4.8 and 3.4.10 of the EMRP that notes some traffic problems cannot be dealt with by just modal shift measures.</p>	
Policy 44 – Sub-Area Transport Objectives	<p>This policy sets out the transport objectives for each sub-area in the East Midlands. In relation to the Southern Sub-area (i.e. Northamptonshire) the objectives that are relevant to West Northamptonshire are:</p> <ul style="list-style-type: none"> • To develop the transport infrastructure and public transport services needed to accommodate major planned housing and employment growth consistent with the Milton Keynes and South Midlands Sub-Regional Spatial Strategy in a sustainable manner, particularly by encouraging walking and cycling; • To develop the transport infrastructure and services needed to support Northampton’s role as 	<p>Section 8, Connections, of the JCS along with the Place specific policies for the Sustainable Urban Extensions, the towns and the rural areas in West Northamptonshire all set out the transport infrastructure, public transport improvements, walking and cycling improvements that are required to accommodate the planned housing and employment.</p> <p>Policy N12 of the JCS sets out the transport network improvements for Northampton. These include:</p> <ul style="list-style-type: none"> • improved connectivity between existing areas of 	Not applicable.

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	<p>one of the Regions five principal Principal Urban Area's in a sustainable manner; and</p> <ul style="list-style-type: none"> • To develop opportunities for modal switch away from road based transport in the nationally important freight distribution sector. 	<p>Northampton;</p> <ul style="list-style-type: none"> • improved connectivity to the town centre by public transport, walking and cycling; • improvements to the priority interchanges of Central Northampton Bus Station and Northampton Castle Station; • enhanced public transport services to and from the priority interchanges; • demand management measures on routes identified as the public transport corridors; and • revised parking standards across the whole of Northampton. <p>Policy C1 of the JCS seeks to change behaviour and achieve modal shift through a series of measures with modal shift targets set in the JCS.</p> <p>Policy C3 of the JCS seeks to enhance rail connections to the Daventry International Rail freight Terminal (DIRFT) to encourage the movement of</p>	

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		<p>goods by rail.</p> <p>Policy E4 of the JCS sets out support for the principal of further rail connected storage and distribution uses at DIRFT which in turn will help achieve modal shift from road based transport to the nationally important rail freight distribution sector.</p>	
Policy 45 – Regional Approach to Traffic Growth Reduction	This policy requires local authorities, public and local bodies and service providers to work together to achieve a progressive reduction over time in the rate of traffic growth in the East Midlands through measures listed in Policy 45.	<p>Section 8, Connections, of the JCS along with the Place specific policies for the Sustainable Urban Extensions, the towns and the rural areas in West Northamptonshire all set out the transport infrastructure, public transport improvements and walking and cycling improvements that together will contribute to reducing the need to travel, restricting unnecessary car usage, significantly improving public transport and encouraging walking and cycling. These measures will contribute to reducing the rate of traffic growth.</p> <p>Policy C1 of the JCS sets out how we will go about changing</p>	Not applicable.

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Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		the way we travel through behaviour change and modal shift which will help reduce overall traffic levels.	
Policy 46 – A Regional Approach to Behavioural Change	This policy requires the Regional Planning Body, with Government, public and local bodies and service providers, to work together to implement measures for behavioural change to encourage a reduction in the need to travel and to change public attitudes toward car usage and public transport, walking and cycling. This policy lists measures to achieve behavioural change.	<p>The majority of the measures listed in Policy 46 of the EMRP are operational and do not relate to spatial planning or are not strategic.</p> <p>Nevertheless, the JCS does through Section 8, Connections, of the JCS along with the Place specific policies for the Sustainable Urban Extensions, the towns and the rural areas in West Northamptonshire all set out the transport infrastructure, public transport improvements and walking and cycling improvements that together will contribute to behavioural change.</p> <p>Policy C1 of the JCS sets out how we will go about changing the way we travel through behaviour change and modal shift which will help reduce overall traffic levels.</p>	Not applicable.

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Policy 47 – Regional Priorities for Parking Levies and Road User Charging	This policy requires all Transport Authorities to examine the feasibility and appropriateness of introducing fiscal measures to reduce car usage. Particular consideration should be given to introducing such measures in the Region’s Principal Urban Areas and Growth Towns, and environmentally sensitive areas experiencing high levels of traffic or traffic growth such as the Peak District National Park.	<p>It is the responsibility of Northamptonshire County Council as the Local Traffic Authority for West Northamptonshire, to consider what, if any, fiscal measures to put in place to reduce car usage.</p> <p>The JCS does contain policies that will help reduce overall car usage through encouraging modal shift, for example Policy C1 for example.</p>	Not applicable.
Policy 48 – Regional Car Parking Standards	This policy requires local planning authorities to apply the maximum amounts of vehicle parking for new development as set out in PPG13. This policy also provides further detail about the application of parking standards and the approach to parking in the Region’s Principal Urban Areas, Growth Towns and environmentally sensitive areas.	<p>PPG13 has now been replaced by the National Planning Policy Framework (NPPF) that leaves parking standards for the consideration of the planning authority (in conjunction with the local transport authority). County standards for parking are already set by the local transport authority and it is not necessary or appropriate to repeat these in the JCS or set out more detailed standards in the JCS.</p> <p>The transport improvement policies contained within the Places sections of the JCS outline that there will be ‘revised’</p>	Not applicable.

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		parking standards if appropriate within the towns of West Northamptonshire.	
Policy 49 – A Regional Approach to Improving Public Transport Accessibility	<p>This policy requires local authorities and service operators to promote improvements in public transport accessibility by using the Regional Public Transport Network defined in Diagram 7 in order to:</p> <ul style="list-style-type: none"> • Inform public transport investment decisions; • Inform strategic development decisions as part of the Local Development Framework process; and • Promote and market the use of public transport generally. 	<p>The JCS promotes improvements to public transport accessibility through its Connections Policies C1, C2, and C4. In particular Part A of Policy C4 sets out Public Transport Corridor improvements that are to be made during the plan period. The policy states that: “An effective, reliable inter-urban public transport network linking major towns and cities, including the development of a high quality Northamptonshire Arc Transit Network, will be prioritised on the following principal journey to work corridors”. The policy then lists a number of corridors that are set to be improved.</p>	Not applicable.
Policy 50 – Regional Heavy Rail Priorities	<p>This policy requires DfT Rail, Network Rail, local authorities, public bodies, community rail partnerships and train operating companies to work together to achieve improvements in rail passenger services. Measures to achieve the regional heavy rail priorities are listed in Policy 50 of the EMRP.</p>	<p>There are a number of policies in the JCS that reflect Policy 50 of the EMRP:</p> <ul style="list-style-type: none"> • Policy C3 of the JCS identifies the priorities for strategic connections, including rail connections, within West 	Not applicable.

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		<p>Northamptonshire. The policy outlines that there will be an enhanced service in terms of journey time and frequency of passenger rail services between London and Birmingham (via Northampton Castle Station) and the introduction of additional rail services to the wider north west for passenger and freight movements along the M6 corridor to relieve congestion on the road network;</p> <ul style="list-style-type: none"> • Policy C4 of the JCS seeks to deliver an effective inter-urban public transport network including the rail network. Improvements are proposed at key public transport interchanges including the rail stations at Northampton, Long Buckby and Kings Sutton. Improvements at Northampton Castle Station also feature in Policy N12 of the JCS; and • Policy C6 of the JCS seeks to maximise the benefits that could arise from the HS2. 	

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		<p>For example the additional capacity on the West Coast main line could enable the delivery of improved journey times and services from Northampton to London and Birmingham.</p>	
<p>Policy 51 – Regional Priorities for Bus and Light Rail Services</p>	<p>This policy requires local authorities, public bodies and service providers to work together to increase the level of bus and light rail patronage at the regional level towards the national target of 12% by 2010. The policy lists measures to achieve the regional priorities for bus and light rail services.</p> <p>The explanatory text to Policy 51 refers to the level of growth proposed at Northampton and emphasises the need to integrate land use and transport planning and to ensure that all new urban extensions are served by high quality public transport.</p>	<p>The specific national target set out in Policy 51 is now become obsolete. However, Policy C1 of the JCS seeks to achieve modal shift, i.e. the transfer of journeys from the private car to other modes such as walking, cycling and public transport. The JCS aims to achieve 5% modal shift across existing development and 20% from new development.</p> <p>Other policies in the JCS such as C3 and C4 contain proposals that seek to increase the level of bus and rail patronage within the West Northamptonshire area.</p> <p>Specific transport policies are included in the JCS for the towns in West Northamptonshire and these policies also include provisions which should increase the patronage of public</p>	<p>Not applicable.</p>

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		transport. For example, Policy D5 promotes an improved public transport network for the town and includes the potential for innovative solutions such as Rapid Transit Systems.	
Policy 52 – Regional Priorities for Integrating Public Transport	<p>This policy states that local planning authorities, local transport authorities and public transport service providers should:</p> <ul style="list-style-type: none"> • Promote the integration of public and other transport services; • Promote the development of a hierarchy of public transport interchange facilities at key locations; • Promote safe and convenient access on foot and by cycle to public transport services; • Consider settlements with existing or proposed public transport interchange facilities as locations for new development; and • Promote the development of new park and ride facilities in appropriate locations. 	<p>Policy C4 of the JCS sets out a range of measures to improve the inter-urban public transport network which are focused on priority journey to work corridors. The measures include improvements to the accessibility of public transport and integrated ticketing across different modes of transport and administrative boundaries.</p> <p>Priority public transport interchanges are identified across the West Northamptonshire area. These interchanges are expected to provide safe and convenient access for pedestrians and a range of facilities such as secure cycle parking.</p> <p>Specific transport policies for the key towns in the area also include measures to support the</p>	Not applicable.

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		<p>integration of public transport. For example Policy N12 of the JCS includes proposals for improved connectivity throughout the town by public transport with a focus on the priority interchanges at Northampton Bus Station and Northampton Castle Station.</p> <p>The majority of new development proposed in the JCS is focused in those settlements where the existing public transport interchanges are located.</p> <p>Policy C5 of the JCS does enable the promotion of park and ride facilities, however following discussions with Northamptonshire County Council (as the Transport Authority) park and ride facilities are not specifically identified in the JCS as it is considered that investment in public transport improvements would be more effective in the short to medium term although in the longer term it may become a more favourable option. Furthermore,</p>	

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		<p>Policy C5 does not prejudice proposals for park and ride facilities coming forward through the development process. Where appropriate, local provision has been identified such as the local multi-modal interchange within the Northampton North Sustainable Urban Extension (Policy N3).</p>	
<p>Policy 53 – Regional Trunk Road Priorities</p>	<p>This policy requires the Highways Agency, working closely with regional bodies and individual Transport Authorities and Local Planning Authorities to:</p> <ul style="list-style-type: none"> • Work to progress the identification and implementation of trunk road investment priorities subject to full and detailed appraisal; • Ensure that any additional trunk road schemes are consistent with Regional Transport Strategy (RTS) Objectives (Policy 43 of the EMRP); and • Ensure that all highway capacity is managed effectively to reduce congestion and improve safety. 	<p>Policy C3 of the JCS identifies major highway improvements to support strategic connectivity including the M1/ A45 Northampton Growth Management Scheme (NGMS) and the A43 Kettering to Northampton improvements. The NGMS provides a good example of how the local planning and transport authorities have worked together with the Highways Agency to ensure that future growth of the network and capacity is managed effectively to reduce congestion and improve safety.</p> <p>The key primary infrastructure projects listed in Table 7 of the JCS include other major</p>	<p>Not applicable.</p>

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		<p>highway proposals such as the Northampton North West Bypass and the Daventry Development Link. Full details of all the proposed highways improvements are set out in the Infrastructure Delivery Plan (Appendix 4 of the JCS).</p> <p>The Regional Transport Strategy has been taken into consideration when preparing the JCS, and as such the RTS is listed in Appendix 1 of the JCS (Plans and other Strategies taken into account in the Preparation of the JCS).</p>	
Policy 54 – Regional Major Highway Priorities	<p>This policy requires Local Transport Authorities, working closely with Local Planning Authorities and national and regional bodies to:</p> <ul style="list-style-type: none"> • Work to progress the identification and implementation of highway investment priorities subject to full and detailed appraisal; • Ensure that any additional highway schemes are consistent with RTS Objectives (Policy 43) and the relevant Sub-area Objectives (Policy 44); and • Ensure that all highway capacity is 	<p>In preparing the JCS full consideration has been given to the area’s major highway priorities in the context of the RTS as set out in Policy C3 of the JCS and the Infrastructure Delivery Plan. The commentary set out in respect of Policy 53 of the EMRP above is also relevant for Policy 54 of the EMRP and need not be repeated here.</p>	Not applicable.

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	managed effectively to reduce congestion and improve safety.		
Policy 55 – Implementation of the Regional Freight Strategy	This policy requires the Regional Planning Body to work with emda, Local Transport Authorities, other public bodies and representatives of the freight industry and its customers to implement the Regional Freight Strategy. The policy lists the key priorities for implementation.	<p>In preparing the JCS consideration has been given to the Regional Freight Strategy. Appendix 1 of the JCS (Plans and other strategies taken into account in the preparation of the Joint Core Strategy) lists the Regional Freight Strategy as one of the documents that has been taken into consideration when preparing the JCS.</p> <p>Policy C3 of the JCS supports proposals to use the canal network for freight movements.</p> <p>Policy C3 of the JCS also seeks to enhance rail connections to the Daventry International Rail Freight Terminal (DIRFT) to encourage the movement of goods by rail.</p> <p>Policy E4 of the JCS sets out support for the principle of further rail connected storage and distribution uses at Daventry International Rail Freight Terminal reflecting one of the Regional Freight</p>	Not applicable.

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		Strategy's key priorities of achieving a significant modal shift from road to rail as set out in Policy 55 of the EMRP.	
Policy 56 – Regional Priorities for Air Transport	<p>This policy requires Local Development Frameworks and Local Transport Plans across the Region to:</p> <ul style="list-style-type: none"> • set out policies on access to regional and national airports serving the area that promote travel by means other than the private car; and • support the existing roles of smaller airports/ aerodromes where this is consistent with local amenity. 	Policy C3 of the JCS includes a specific provision to improve access and journey times to East Midlands Airport. The small airfields within West Northamptonshire are not of strategic significance and as such a specific policy has not been included in the JCS.	Not applicable.
Policy 57 – Regional Priorities for Implementation, Monitoring and Review	<p>This policy requires local authorities to work with developers, statutory agencies and other local stakeholders to produce delivery plans outlining the infrastructure requirements needed to secure the implementation of Local Development Documents including guidance on the appropriate levels of developer contributions and the mechanisms for securing the delivery of such contributions.</p> <p>This policy also sets out various requirements for the Regional Planning Body in relation to an Implementation Plan, an Annual Monitoring Report and</p>	The JPU has worked with developers, statutory agencies and service providers to produce an Infrastructure Delivery Plan for West Northamptonshire (IDP). The IDP was first produced in 2011 and updated in 2012. The IDP sets out the key primary infrastructure projects required to support the delivery of the JCS. Section 11, Infrastructure and Delivery, of the JCS sets out the mechanisms for securing infrastructure delivery.	Not applicable.

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	<p>the review of the East Midlands Regional Plan.</p>	<p>The Regional Planning Body (RPB) has now been abolished; therefore the actions in Policy 57 of the EMRP relating to the RPB are no longer relevant.</p>	
<p>Policy MKSM SRS Northamptonshire 1 – The Spatial Framework</p>	<p>This policy sets out the spatial framework for Northamptonshire. The majority of development in Northamptonshire should be concentrated at the Northampton Implementation Area. Beyond this development should be focused at the Sub-Regional Centre of Daventry and the rural service centres of Towcester and Brackley.</p> <p>In the rural hinterlands, development should be limited with the emphasis being on meeting local needs and the retention of basic services and facilities.</p> <p>This policy sets out the housing provision for each local authority area in Northamptonshire for each of the five year phases over the period 2001-2026 at annual average rates as well as the total provision for the whole of West Northamptonshire over the period 2001-26 of 62,125 dwellings.</p>	<p>Policy S1 of the JCS reflects the spatial distribution and hierarchy of settlements as set out in Policy MKSM SRS Northamptonshire 1 – The Spatial Framework of the EMRP.</p> <p>The Joint Core Strategy plans for 50,150 dwellings between 2001 and 2026. This is a reduction of 19.3% across West Northamptonshire.</p>	<p>Reduced quantum and phasing of development planned within West Northamptonshire due to significant change in market conditions. The 19.3% decrease in the West Northamptonshire target is felt to be within what could be considered general conformity with the EMRP.</p>

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	<p>The annual average housing provision rates for Daventry and South Northamptonshire districts are 540 and 330 dwellings respectively throughout the plan period 2001-21.</p> <p>Northampton Implementation Area's annual average housing provision rate is:</p> <ul style="list-style-type: none"> • 1,300 dwellings in the plan period 2001-26; • 1,450 dwellings in the plan period 2006-11; and • 1,775 dwellings in the plan period 2011-21. <p>The annual average housing provision rate for the period 2021-26 is set out as one figure for the whole of the West Northamptonshire Housing Market Area of 2,645 dwellings.</p>		
Policy MKSM SRS Northamptonshire 2 – Northampton Implementation Area	This policy sets out the requirements for the Northampton Implementation Area (NIA) including that new development will be delivered through a combination of urban regeneration and intensification and the development of new sustainable urban extensions, integrated with the development of enhanced public transport and new public interchanges.	The West Northamptonshire Joint Strategic Planning Committee was established by Statutory Instrument in 2008. The Committee is comprised of Councillors from Daventry District, Northampton Borough, South Northamptonshire and Northamptonshire County Council. The Committee is responsible for plan-making in	Reduce quantum of development planned within West Northamptonshire due to significant change in market conditions. The 17% decrease in the Northampton target is felt to be within what could be considered general conformity within the Sub-Regional Strategy.

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	<p>This policy requires Daventry District, Northampton Borough and South Northamptonshire Councils to work together to deliver growth within the NIA through the preparation of joint core strategies and a joint Local Development Document to investigate longer term growth options for the NIA.</p> <p>This policy sets out the housing provision for the NIA for each of the five year phases over the period 2001-2026 at annual average rates as well as the total provision for the whole of the NIA over the period 2001-26 of 40,375 dwellings.</p> <p>The policy also requires that the levels of development proposed will be monitored against an increase in employment of 37,200 jobs in the West Northamptonshire in the period to 2021. This employment figure is a reference value to be used for the monitoring and review and not as target.</p> <p>The policy sets out a list of matters that should be addressed through the Local Development Documents for the NIA.</p>	<p>West Northamptonshire. As set out in the approved West Northamptonshire Local Development Scheme (June 2012) the main priority of the Committee is the preparation of one Joint Core Strategy (JCS) covering the whole of the West Northamptonshire area.</p> <p>The preparation of this JCS is well advanced. The JCS will be supported by the Northampton Related Development Area (NRDA) Local Plan which will be prepared jointly. The Local Plan will make allocations and set out the development management policies for Northampton. In accordance with the approved LDS preparation of the NRDA Local Plan has commenced.</p> <p>Policy S1 of the JCS sets out the distribution of development in West Northamptonshire with development concentrated primarily in and adjoining the Principal Urban Area of Northampton.</p>	<p>Given that the 37,200 value is not a target and that 15,000 have already been provided between 2001-2008 the JCS jobs provision is considered to be generally in conformity with the RSS policy.</p>

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		<p>The supporting justification to Policies S3 and S4 of the JCS set out the housing requirement for Northampton and explain that due to the administrative boundary of Northampton Borough this requirement will be met through a combination of development within the existing urban area and sustainable urban extensions in Northampton Borough and sustainable urban extensions in the adjoining districts of Daventry and South Northamptonshire.</p> <p>Policy S4 of the JCS identifies the Northampton Related Development Area (NRDA) and the provision of housing required in the NRDA of 33,680 dwellings between 2001-2026. This is a reduction of 17% below the RSS target.</p> <p>Policy S5 of the JCS identifies the sustainable urban extensions to be provided in West Northamptonshire including related to Northampton.</p>	

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		<p>Policies C1, C2, C4, C5, N12 all ensure that new development in the NRDA will be served by enhanced public transport and new public interchanges.</p> <p>Policy S7 of the JCS makes provision for a minimum net increase of 19,000 jobs in the period 2008-2026. This is in order to maintain an appropriate balance between homes and jobs that is the basis of the RSS approach.</p> <p>It is considered that the Local Plans that are under preparation for the NRDA will address the matters listed in the EMRP's Policy MKSM SRS Northamptonshire 2.</p>	
Policy MKSM SRS Northamptonshire 3 – Northampton Central Area	<p>This policy requires Northampton Borough Council , in partnership with other relevant bodies, to prepare a Local Development Document to provide a long-term framework for revitalising and upgrading the quality and facilities of the central area, including:</p> <ul style="list-style-type: none"> • developing the area around and including the railway station not only as a transport hub but also as an 	<p>Policies N1. N2 and N12 of the JCS reflect the content of Policy MKSM SRS Northamptonshire 3 – Northampton Central Area and sets out the strategic context for the Northampton Central Area Action Plan (NCAAP).</p> <p>The NCAAP is at an advanced stage with the Inspector's Report published in November</p>	Not applicable.

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
	<p>attractive and vibrant gateway to the town centre and a focus for development;</p> <ul style="list-style-type: none"> • improving the range and quality of retail provision by increasing comparison and convenience floorspace, and linking this into a revitalisation of the rest of the central area incorporating attractive links to the railway station and waterfront areas; • making the central area the focus of a range of employment opportunities with a particular emphasis on offices; • developing cultural/ heritage tourism by enhancing the existing cultural heritage facilities and attractions, and through the provision of new facilities; and • increasing the range of centrally located overnight accommodation. 	<p>2012. Subject to Main Modifications the Inspector has found the NCAAP sound and it is now moving towards adoption in early 2013. The NCAAP also reflects the content of Policy MKSM SRS Northamptonshire 3.</p>	
<p>Policy MKSM SRS Northamptonshire 4 – Corby, Kettering and Wellingborough</p>	<p>Not relevant to the West Northamptonshire Joint Core Strategy</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>Policy Three Cities SRS 1 – Definition of Principal urban Areas</p>	<p>Not relevant to the West Northamptonshire Joint Core Strategy</p>	<p>Not applicable.</p>	<p>Not applicable.</p>

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Policy Three Cities SRS 2 – Sub-Regional Priorities for Green Belt Areas	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Three Cities SRS 3 – Housing Provision	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Three Cities SRS 4 – Employment Land	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Three Cities SRS 5 – Green Infrastructure and National Forest	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Northern SRS 1 – Sub-Regional Development Priorities	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Northern SRS 2 – Supporting the roles of Town and Village Centres	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Northern SRS 3 – Sub-Regional Employment Regeneration Priorities	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Northern SRS 4 – Enhancing Green Infrastructure Through Development	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Northern SRS 5 – Sherwood Forest Regional Park	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Policy Lincoln Policy Area SRS 1 – Spatial Priorities for the Lincoln Policy Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 2 – Site Selection in the Lincoln Policy Area	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 3 – Protection of Lincoln’s Urban Fringe	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 4 – Housing Provision	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 5 – Employment Density	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 6 – Tourism, Culture and Education	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 7 – Deprivation and Exclusion	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 8 – Flood Risk and Water Management	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 9 – Sub-Regional Country Park	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.

Assessment of Conformity and Consistency with the East Midlands Regional Plan

Title	East Midlands Regional Plan Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Policy Lincoln Policy Area SRS 10 – Lincoln Cathedral	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.
Policy Lincoln Policy Area SRS 11 – Sub-Regional Transport Priorities	Not relevant to the West Northamptonshire Joint Core Strategy	Not applicable.	Not applicable.

Assessment of Conformity and Consistency with the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement

Title	Milton Keynes South Midlands Sub-Regional Strategy Part A Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Strategic Policy 1: The Spatial Framework – Locations for Growth	<p>This policy requires the majority of development in the Sub-Region to be focused at growth towns, including Northampton. Provision is to be made at the urban areas including sustainable urban extensions (SUEs) well served by public transport.</p> <p>Housing provision figures are provision for the main towns only. The total housing provision for Northampton for the period 2001-2021 is 30,000 dwellings.</p>	<p>The JCS’s spatial vision and objectives reflect Strategic Policy 1 of the MKSM Sub-Regional Strategy (SRS).</p> <p>Policy S1 of the JCS sets out that development will be focused on Northampton (the growth town identified for the West Northamptonshire area in Strategic Policy 1 of the SRS).</p> <p>Policy S3 of the JCS concentrates development on Northampton.</p> <p>Policies S1 and S5 of the JCS together reflect the SRS Strategic Policy 1 requirement for development to be provided through the urban area and Sustainable Urban Extensions.</p> <p>Policy S4 of the JCS sets out the housing provision for the Northampton Related Development Area for the period 2001-2026 of 33,665 dwellings. This equates to 25,940 dwellings in the period 2001-21.</p>	<p>Reduce quantum of development planned within West Northamptonshire due to significant change in market conditions. The 23% decrease in the Northampton target is felt to be within what could be considered general conformity within the Sub-Regional Strategy.</p>

Assessment of Conformity and Consistency with the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement

Title	Milton Keynes South Midlands Sub-Regional Strategy Part A Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
Strategic Policy 2: The Spatial Framework – Strategic Transport Infrastructure	<p>This policy requires strategic communications infrastructure to be improved and lists key schemes for implementation and/ or development to 2031 including, in West Northamptonshire:</p> <ul style="list-style-type: none"> • Improvements to east-west movement by public transport; • Improvements to the A45; • Improvements to the A428 east-west route; • Modernisation of the West Coast Main Line; and • Widening of the M1 motorway. 	<p>Policy C3 of the JCS sets out the priorities to retain and enhance West Northamptonshire’s strategic connections including:</p> <ul style="list-style-type: none"> • M1 junction 14-19 managed motorway including hard shoulder running (which has replaced M1 widening); and • Traffic management measures and related junction modifications on the A45 in conjunction with development coming forward in the corridors. <p>Policy C4 of the JCS sets out specific improvements to public transport including improvements to the east west movement of public transport, for example Northampton to Wellingborough and Daventry to Northampton.</p> <p>Policy D1 of the JCS includes the provision of A45 corridor improvements from Daventry to Northampton.</p>	Not applicable

Assessment of Conformity and Consistency with the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement

Title	Milton Keynes South Midlands Sub-Regional Strategy Part A Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		<p>The A428 Transport Infrastructure Priority as specified in the MKSM SRS Strategic Policy 2 lies outside the West Northamptonshire area.</p> <p>The modernisation of the West Coast Main line was completed in 2008.</p>	
Strategic Policy 3: Sustainable Communities	This policy states that sustainable Communities will be achieved in the Sub-Region through the implementation of development in accordance with the list of principles in this policy.	<p>Sustainable Communities form a key part of the JCS and are discussed in detail throughout the plan and its policies.</p> <p>The JCS policies reflect the principles in Strategic Policy 3 of the SRS at S1 (The Distribution of Development), S8 (The Distribution of Jobs), S10 (Sustainable Development Principles), S11 (Low Carbon and Renewable Energy), C1 (Changing Behaviour and Achieving Modal Shift), C2 (New Developments) C3 (Strategic Connections), C4 (Connecting Urban Areas), C5 (Enhancing Local and Neighbourhood Connections), RC1 (Delivering</p>	Not applicable

Assessment of Conformity and Consistency with the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement

Title	Milton Keynes South Midlands Sub-Regional Strategy Part A Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
		<p>Community Regeneration), RC2 (Community Needs), E2 (New Office Floorspace), E3 (Technology Realm, SEMLEP Northampton Waterside Enterprise Zone), E6 (Education, Skills and Training), H1 (Housing Density and Mix and Type of Dwellings), H2 (Affordable Housing), H4 (Specialised Accommodation), H5 (Sustainable Housing), BN1 (Green Infrastructure Connections), BN5 (The Historic Environment) and BN7a (Water Supply, Quality and Wastewater Infrastructure).</p>	
Strategic Policy 4: Effective Delivery	<p>This policy states that the delivery of the Sub-Regional Strategy will be secured through:</p> <ul style="list-style-type: none"> • The Inter-Regional Board; • Establishment of Local Delivery Vehicles (LDVs) covering all of the growth locations to drive the sustainable growth of the Sub-Region; • Preparation of Business Plans by each LDV; and • Early preparation of priority Local Development Documents (LDDs) to 	<p>The Inter-Regional Board has been disbanded.</p> <p>The West Northamptonshire Development Corporation was established in 2004 and has published Business Plans regularly since then.</p> <p>The West Northamptonshire Joint Core Strategy is the priority plan in West Northamptonshire and is now at an advanced stage.</p>	Not applicable

Assessment of Conformity and Consistency with the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement

Title	Milton Keynes South Midlands Sub-Regional Strategy Part A Policy Content	How the Joint Core Strategy conforms and is consistent	Justification for any areas of non-conformity and inconsistency
	<p>guide development in areas of change in accordance with Local Development Schemes (LDS).</p> <p>The policy requires that progress in achieving resources for the Sub-Region and in implementing the Sub-Regional Strategy will be monitored regularly and reported as part of the Annual Monitoring Reports prepared by the Regional Assemblies.</p>	<p>The West Northamptonshire Joint Local Development Scheme was first approved by the West Northamptonshire Joint Strategic Planning Committee in March 2007 and has been updated regularly since then.</p> <p>Regional Assemblies have now been abolished; therefore the implementation of the sub-regional policies is not monitored by these organisations.</p>	

APPENDIX 2

Addendum – Summary of Representations to the Pre-Submission Joint Core Strategy and the Joint Planning Unit Response to the Representations

10.0 Built and Natural Environment

49. Introduction

Summary of Representations

Policy/ Section	Total No of Reps	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Introductory Text	4	4	0	2	2	0	2	0	0

Summary of Issues raised by Respondents

The majority of the respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.

One respondent requests that the Joint Core Strategy explicitly recognises the importance of the “Nene Ridge” through the addition of a specific policy in Section 10 of the Joint Core Strategy which requires planners and developers to give proper consideration to landscape sensitivity when developing proposals. In addition the respondent also states that this should be considered carefully in assessing the landscape sensitivity impact of the Northampton South of Brackmills Sustainable Urban Extension (Policy N6).

Joint Planning Unit Response to Representations

In relation to the request for the inclusion in the Joint Core Strategy of a specific policy to protect the “Nene Ridge” Policies BN1 and BN5 as well as Paragraph 10.7 of the Pre-Submission Joint Core Strategy provide adequate policy coverage to ensure the recognition of the high landscape and visual sensitivity of certain broad areas, including the “Nene Ridge”.

The suggestion to include the Nene Ridge explicitly in the Joint Core Strategy is unnecessary as the “Nene Ridge” is identified in the Northampton Landscape Sensitivity and Green Infrastructure Study which is available to inform planning and development and underpins the above policies.

Paragraph 10.7 of the Pre-Submission Joint Core Strategy already refers to the Landscape Sensitivity and Green Infrastructure Studies prepared for West Northamptonshire, which include the Northampton Landscape Sensitivity and Green Infrastructure Study.

Policy N6 Northampton South of Brackmills Sustainable Urban Extension and the supporting text in Paragraph 12.47 of the Pre-Submission Joint Core Strategy refer to the provision of landscape buffers and green infrastructure corridors. The supporting text refers to the creation of a green corridor and to the need for the development to

consider the impact on the skyline when viewed from the north. It is therefore considered that the policy provides adequate recognition of the landscape sensitivity of the site, including the importance of the “Nene Ridge”. The Northampton Local Plan policy relating to skylines will remain as a saved policy and as such will continue to be a material consideration.

Minor text changes are proposed to the introductory text to aid clarity and to reflect the wording of the National Planning Policy Framework.

Recommended Action

That the introductory text be amended as set out in Proposed Changes:

- PC001/BN
- PC002/BN
- PC003/BN
- PC004/BN
- PC005/BN

APPENDIX 3

Table 1 – Regulations 19 and 20 Requirements

Regulation 19 – Publication of a local plan	
Requirement in the Regulation	How the Requirement in the Regulation has been met at the West Northamptonshire Joint Core Strategy Proposed Changes Stage (August 2012)
Before submitting a local plan to the Secretary of State under section 20, the local planning authority must -	
(a) Make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with Regulation 35	<p><i>The proposed submission documents (i.e. the Joint Core Strategy, the Sustainability Appraisal, the Appropriate Assessment, the Statement of Community Engagement and Consultation and the three Statements of Community Involvement) and a statement of the representation procedure were made available at the following locations during normal office hours:</i></p> <ul style="list-style-type: none"> • <i>The main offices of Daventry District Council, Northampton Borough Council, Northamptonshire County Council, South Northamptonshire Council and West Northamptonshire Development Corporation;</i> • <i>All Libraries within West Northamptonshire; and</i> • <i>Some libraries in areas adjoining West Northamptonshire.</i>
(b) Ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under Regulation 18 (1)	<p><i>The proposed submission documents (as listed above), a statement of the representation procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected were all published on both the main West Northamptonshire Joint Planning Unit website and the consultation portal for the Joint Core Strategy.</i></p> <p><i>The proposed submission documents and a statement of the representations procedure were sent to each of the specific consultation bodies listed in Regulation 2 (1). These bodies are</i></p>

listed in Table 4 of Appendix 2 of this report.

The proposed submission documents, a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected were sent to the general consultation bodies listed in Regulation 2 (1). These bodies are listed in Table 4 of Appendix 2 of this report.

Local advertisement notices setting out a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they could be inspected were published in the Brackley and Towcester Advertiser on 10 August 2012 and in the following newspapers: Banbury Guardian, Daventry Express, Harborough Mail, Milton Keynes Citizen, Northampton Chronicle & Echo, Northampton Herald and Post and the Rugby Advertiser on 9 August 2012. These dates were the nearest publication dates of each of the local newspapers prior to the start of the six weeks representations period.

Regulation 20 – Representations relating to a local plan

Requirement in the Regulation

How the Requirement in the Regulation has been met at the West Northamptonshire Joint Core Strategy Proposed Changes Stage (August 2012)

(1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

The representations period for the Proposed Changes to the Pre-Submission version of the West Northamptonshire Joint Core Strategy was six weeks from 14 August 2012 until 26 September 2012.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

Representations could be submitted on-line through the Joint Core Strategy consultation portal, by email, by post and by fax.

(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24 (7) of the Act.

This Regulation is not relevant as it relates to London Boroughs only.

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
3.0 Introduction										
PC003/I: New Paragraph 3.10	36	35	1	13	23	2	6	5	10	0
4.0 Spatial Portrait, Vision and Objectives										
PC006/S: Objective 16	7	7	0	4	3	0	0	2	1	0
5.0 Spatial Strategy										
PC020/SS: Policy S5 – Sustainable Urban Extensions	35	30	5	4	31	6	10	8	7	0
PC022/SS: Policy S6 – Phasing of Housing Development	35	19	16	3	32	5	9	11	7	0
PC031/SS: Policy S7 – Provision of Jobs	17	8	9	3	14	4	4	3	3	0
PC039/SS: Policy S8 – Distribution of Jobs	22	13	9	3	19	3	6	8	2	0
PC054/SS: Table 2	1	1	0	1	0	0	0	0	0	0
PC055/SS: Table 2	1	1	0	1	0	0	0	0	0	0
PC056/SS: Table 2	1	1	0	1	0	0	0	0	0	0
PC057/SS: Table 2	0	0	0	0	0	0	0	0	0	0
PC067/SS: Policy S10 - Sustainable Development Principles	32	32	0	6	26	3	5	14	4	0

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC070/SS: New Paras. 5.86 and 5.87	6	6	0	0	6	0	3	3	0	0
PC074/SS: New Paras. 5.88 – 5.89	8	8	0	1	7	1	3	3	0	0
PC075/SS: New Paras. 5.90 – 5.92	4	4	0	0	4	0	2	2	0	0
PC076/SS: Policy S11 - Renewable Energy	37	30	7	3	34	4	10	13	7	0
West Northamptonshire Wide Policies										
6.0 Connections										
PC018/C: Policy C3 – Strategic Connections	6	6	0	2	4	0	1	3	0	0
PC019/C: Policy C3 – Strategic Connections	3	3	0	1	2	0	1	1	0	0
8.0 Economic Advantage										
PC009/E: Policy E3 – Technology Realm, Northampton North	4	4	0	1	3	0	1	2	0	0
9.0 Housing										
PC003/H: Table 4	13	2	11	0	13	0	6	4	3	0
PC011/H: Policy H2 – Affordable Housing	41	39	2	2	39	4	15	13	7	0

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC012/H: Existing Para. 9.14 & Policy H3 – Rural Exception Sites	5	5	0	1	4	1	1	1	1	0
10.0 Built and Natural Environment										
PC017/BN: Policy BN3 – Woodland Enhancement and Creation	3	3	0	0	3	0	1	1	1	0
PC027/BN: Policy BN4 – Upper Nene Valley Gravel Pits Potential Special Protection Area	5	5	0	3	2	1	1	0	0	0
PC053/BN: New Policy BN7a – Water Supply, Quality and Wastewater Infrastructure	11	11	0	5	6	0	2	2	2	0
PC054/BN: Policy BN7 – Flood Risk	5	5	0	4	1	0	0	1	0	0
PC060/BN: Policy BN9 – Planning for Pollution Control	2	2	0	1	1	0	0	1	0	0

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
11.0 Infrastructure and Delivery										
PC014/ID: Policy INF2 – Contributions to Infrastructure Requirements	17	11	6	8	9	0	2	5	2	0
PC016/ID: Table 7	9	0	9	0	9	0	3	3	3	0
PC017/ID: Table 7	9	9	9	0	9	0	3	3	3	0
PC018/ID: Table 7	12	0	12	0	12	0	4	4	4	0
PC019/ID: Table 7	9	0	9	0	9	0	3	3	3	0
PC020/ID: Table 7	12	0	12	0	12	0	4	4	4	0
PC021/ID: Table 7	9	0	9	0	9	0	3	3	3	0
PC022/ID: Table 7	10	1	9	1	9	0	3	3	3	0
PC023/ID: Table 7	10	1	9	1	9	0	3	3	3	0
PC024/ID: Table 7	10	1	9	1	9	0	3	3	3	0
PC025/ID: Table 7	9	0	9	0	9	0	3	3	3	0
PC026/ID: Table 7	9	0	9	0	9	0	3	3	3	0
PC027/ID: Table 7	9	0	9	0	9	0	3	3	3	0
PC028/ID: Table 7	10	1	9	0	10	0	3	4	3	0
PC029/ID: Table 7	10	1	9	1	9	0	3	3	3	0
Places Policies										
12.0 Northampton										
PC005/N: Policy N1 – The Regeneration of Northampton	6	6	0	4	2	0	1	1	0	0

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC007/N: Policy N2 – Northampton Central Area	8	8	0	4	4	1	1	1	1	0
PC011/N: Para. 12.28	0	0	0	0	0	0	0	0	0	0
PC013/N: Policy N3 – Northampton North Sustainable Urban Extension	15	2	13	4	11	1	4	3	2	1
PC017/N: Policy N4 – Northampton West Sustainable Urban Extension	5	4	1	2	3	0	1	1	1	0
PC020/N: Policy N5 – Northampton South Sustainable Urban Extension	44	18	26	3	41	12	17	12	0	0
PC022/N: Policy N6 – Northampton South of Brackmills Sustainable Urban Extension	5	5	0	3	2	0	1	1	0	0
PC024/N: Existing Para. 12.56	1	1	0	1	0	0	0	0	0	0
PC026/N: Policy N7 – Northampton King’s Heath SUE	6	6	0	4	2	0	0	1	0	1

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC028/N: Policy N8 – Northampton North of Whitehills Sustainable Urban Extension	8	8	0	3	5	0	1	4	0	0
PC033/N: Policy N9 – Northampton Upton Park Sustainable Urban Extension	4	4	0	3	1	0	1	0	0	0
PC037/N: Policy N10 – Shopping Needs Outside Northampton Town Centre	4	4	0	1	3	0	2	0	1	0
PC045/N: Policy N12 – Northampton’s Transport Network Improvements	2	2	0	2	0	0	0	0	0	0
13.0 Daventry										
PC014/D: Policy D1 – The Regeneration of Daventry Town	0	0	0	0	0	0	0	0	0	0
PC015/D: Policy D2 – Daventry Town Centre	2	2	0	1	1	0	0	0	1	0
PC025/D: Policy D3 – Daventry North East SUE	5	5	0	0	5	0	2	3	0	0

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC027/D: Policy D3 – Daventry North East Sustainable Urban Extension	1	1	0	1	0	0	0	0	0	0
14.0 Towcester										
PC005/T: Existing Paras. 14.15 – 14.19	3	3	0	2	1	0	1	0	0	0
PC006/T: Policy T3 – Towcester South Sustainable Urban Extension	12	12	0	3	9	2	3	1	3	0
15.0 Brackley										
PC010/B: Policy B2 – Brackley East Sustainable Urban Extension	10	2	8	2	8	2	2	2	2	0
PC013/B: Policy B3 – Brackley North Sustainable Urban Extension	7	0	7	2	5	1	1	2	1	0
16.0 Rural Areas										
PC010/R: Policy R1 – Spatial Strategy for the Rural Areas	47	35	12	3	44	10	16	8	10	0

APPENDIX 3

Table 2 - Summary Table of Representations by Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons					
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated	
17.0 Monitoring and Implementation Framework											
PC004/M: New Para. 17.3	0	0	0	0	0	0	0	0	0	0	0
PC011/M: Existing Para. 17.8	0	0	0	0	0	0	0	0	0	0	0
PC026/M: Existing Para. 17.15	0	0	0	0	0	0	0	0	0	0	0
18.0 Appendices											
Appendix 4 – West Northamptonshire Infrastructure Schedule											
PC001/A4: Introductory Text	19	7	12	3	16	0	6	5	5	5	0
PC002/A4: Tables (pages 202 to 222)	11	5	6	2	9	0	4	3	2	2	0
Appendix 6 – West Northamptonshire Monitoring Framework											
PC001/A6 – PC182/A6: Monitoring Tables Text	11	5	6	5	6	0	2	2	2	2	0
TOTAL	730	450	280	133	597	63	199	201	132	132	2

APPENDIX 3

Table 3 - Summary Table of Representations by Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons					
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated	
5.0 Spatial Strategy											
PC001/SS: Para. 5.4	0	0	0	0	0	0	0	0	0	0	
PC002/SS: Para. 5.7	0	0	0	0	0	0	0	0	0	0	
PC003/SS: Para. 5.14	0	0	0	0	0	0	0	0	0	0	
PC004/SS: Policy S1 – The Distribution of Development	3	3	0	0	3	0	1	1	1	0	
PC005/SS: Para. 5.15	0	0	0	0	0	0	0	0	0	0	
PC006/SS: Para. 5.16	0	0	0	0	0	0	0	0	0	0	
PC007/SS: Para. 5.18	0	0	0	0	0	0	0	0	0	0	
PC008/SS: Para. 5.20	0	0	0	0	0	0	0	0	0	0	
PC009/SS: Policy S2 – Hierarchy of Centres	1	1	0	0	1	0	1	0	0	0	
PC010/SS: Policy S2 – Hierarchy of Centres	1	1	0	0	1	0	0	1	0	0	
PC011/SS: Para. 5.21	0	0	0	0	0	0	0	0	0	0	
PC012/SS: Para. 5.21	5	1	4	0	5	2	1	1	1	0	
PC013/SS: Para. 5.22	4	1	3	0	4	2	1	0	1	0	
PC014/SS: Table 1	10	8	2	0	10	2	4	2	2	0	
PC015/SS: Para. 5.23	1	1	0	0	1	1	0	0	0	0	
PC016/SS: Para. 5.24	0	0	0	0	0	0	0	0	0	0	
PC017/SS: Para. 5.26	0	0	0	0	0	0	0	0	0	0	
PC018/SS: Policy S3 – Scale & Distribution of Housing	39	14	25	1	38	6	12	8	11	1	

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Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC034/SS: Existing Para. 5.40	0	0	0	0	0	0	0	0	0	0
PC035/SS: Existing Para. 5.41	1	0	1	0	1	0	1	0	0	0
PC036/SS: Existing Para. 5.42	0	0	0	0	0	0	0	0	0	0
PC037/SS: Existing Para. 5.43	0	0	0	0	0	0	0	0	0	0
PC038/SS: Existing Para. 5.44	0	0	0	0	0	0	0	0	0	0
PC040/SS: Existing Para. 5.45	0	0	0	0	0	0	0	0	0	0
PC041/SS: Existing Para. 5.45	0	0	0	0	0	0	0	0	0	0
PC042/SS: Existing Para. 5.46	0	0	0	0	0	0	0	0	0	0
PC043/SS: Existing Para. 5.47	1	0	1	0	1	0	1	0	0	0
PC044/SS: Existing Para. 5.48	0	0	0	0	0	0	0	0	0	0
PC045/SS: Existing Para. 5.49	4	4	0	0	4	1	0	2	1	0
PC046/SS: Existing Para. 5.51	1	1	0	0	1	0	0	1	0	0

APPENDIX 3

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Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC026/C: Policy C6	0	0	0	0	0	0	0	0	0	0
7.0 Regenerating and Developing Communities										
PC001/RC: Para. 7.11	0	0	0	0	0	0	0	0	0	0
PC002/RC: Para. 7.19	0	0	0	0	0	0	0	0	0	0
PC003/RC: Table 3	3	3	0	3	0	0	0	0	0	0
PC004/RC: Para. 7.26	3	3	0	3	0	0	0	0	0	0
PC005/RC: Para. 7.29	0	0	0	0	0	0	0	0	0	0
PC006/RC: Para. 7.31	0	0	0	0	0	0	0	0	0	0
PC007/RC: Para. 7.32	0	0	0	0	0	0	0	0	0	0
PC008/RC: Para. 7.35	0	0	0	0	0	0	0	0	0	0
PC009/RC: Footnote to Para. 7.35	0	0	0	0	0	0	0	0	0	0
PC010/RC: Para. 7.36	0	0	0	0	0	0	0	0	0	0
PC011/RC: Footnote to Para. 7.36	0	0	0	0	0	0	0	0	0	0
PC012/RC: Para. 7.42	0	0	0	0	0	0	0	0	0	0
PC013/RC: Policy RC2	12	6	6	0	12	0	4	4	4	0
PC014/RC: Policy RC2	7	1	6	0	7	0	2	3	2	0
PC015/RC: Policy RC2	6	0	6	0	6	0	2	2	2	0
PC016/RC: Policy RC2	6	0	6	0	6	0	2	2	2	0
PC017/RC: Policy RC2	6	0	6	0	6	0	2	2	2	0
PC018/RC: Policy RC2	6	0	6	0	6	0	2	2	2	0
8.0 Economic Advantage										
PC001/E: Para. 8.5	0	0	0	0	0	0	0	0	0	0
PC002/E: Para. 8.5	1	1	0	1	0	0	0	0	0	0

APPENDIX 3

Table 3 - Summary Table of Representations by Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC006/H: New Para. 9.11	12	0	12	0	12	0	4	4	4	0
PC007/H: Existing Para. 9.10	0	0	0	0	0	0	0	0	0	0
PC008/H: Existing Para. 9.11	0	0	0	0	0	0	0	0	0	0
PC009/H: Existing Para. 9.12	0	0	0	0	0	0	0	0	0	0
PC010/H: New Para. 9.16	4	4	0	0	4	0	2	2	0	0
PC013/H: Existing Para. 9.15	0	0	0	0	0	0	0	0	0	0
PC014/H: Policy H4	0	0	0	0	0	0	0	0	0	0
PC015/H: Existing Para. 9.16	0	0	0	0	0	0	0	0	0	0
PC016/H: Policy H5	13	13	0	0	13	2	2	5	2	2
PC017/H: Existing Para. 9.19	0	0	0	0	0	0	0	0	0	0
PC018/H: Existing Para. 9.21	0	0	0	0	0	0	0	0	0	0
PC019/H: Existing Para. 9.23	0	0	0	0	0	0	0	0	0	0
PC020/H: Existing Para. 9.26	0	0	0	0	0	0	0	0	0	0
PC021/H: Policy H7	2	2	0	2	0	0	0	0	0	0

APPENDIX 3

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Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons					
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated	
15.0 Brackley											
PC001/B: Para. 15.3	0	0	0	0	0	0	0	0	0	0	0
PC002/B: Para. 15.7	0	0	0	0	0	0	0	0	0	0	0
PC003/B: Para. 15.8	0	0	0	0	0	0	0	0	0	0	0
PC004/B: Para. 15.10	0	0	0	0	0	0	0	0	0	0	0
PC005/B: Para. 15.12	0	0	0	0	0	0	0	0	0	0	0
PC006/B: Para. 15.13	0	0	0	0	0	0	0	0	0	0	0
PC007/B: Policy B1	0	0	0	0	0	0	0	0	0	0	0
PC008/B: Para. 15.16	0	0	0	0	0	0	0	0	0	0	0
PC009/B: Para. 15.18	0	0	0	0	0	0	0	0	0	0	0
PC011/B: Para. 15.21	0	0	0	0	0	0	0	0	0	0	0
PC012/B: Para. 15.25	0	0	0	0	0	0	0	0	0	0	0
16.0 Rural Areas											
PC001/R: Para. 16.4	4	4	0	0	4	0	1	0	3	0	0
PC002/R: Para. 16.8	0	0	0	0	0	0	0	0	0	0	0
PC003/R: Para. 16.9	0	0	0	0	0	0	0	0	0	0	0
PC004/R: Policy R1/ Para 16.9	1	1	0	0	1	0	1	0	0	0	0
PC005/R: Para. 16.10	1	1	0	0	1	0	1	0	0	0	0
PC006/R: Para. 16.10 a)	0	0	0	0	0	0	0	0	0	0	0
PC007/R: Para. 16.15	1	1	0	0	1	0	1	0	0	0	0
PC008/R: New Paras after Para. 16.15	1	1	0	0	1	0	1	0	0	0	0

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Table 3 - Summary Table of Representations by Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC021/G: Strategic Environmental Assessment	0	0	0	0	0	0	0	0	0	0
PC022/G: Sustainable Urban Extensions (SUEs)	0	0	0	0	0	0	0	0	0	0
PC023/G: Water Cycle Study (Phase 1)	0	0	0	0	0	0	0	0	0	0
PC024/G: Water Cycle Study (Phase 2)	0	0	0	0	0	0	0	0	0	0
PC025/G: West Northamptonshire Employment Land Study (WNELS)	0	0	0	0	0	0	0	0	0	0
Section 20 – Maps and Key Diagram										
PC001/MK: Figure 2 and Figure 3	0	0	0	0	0	0	0	0	0	0
PC002/MK: New Figure 3-1	1	1	0	0	1	0	0	1	0	0
PC003/MK: Figure 4	0	0	0	0	0	0	0	0	0	0
PC004/MK: Figure 5 and all Inset Maps	1	1	0	0	1	0	1	0	0	0
PC005/MK: Inset Map 1	4	4	0	0	4	1	1	1	1	0

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Table 3 - Summary Table of Representations by Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Proposed Change (Policy/ Section of the Pre-Submission Joint Core Strategy)	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons				
		Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
PC018/MK: Inset Map 14	0	0	0	0	0	0	0	0	0	0
PC019/MK: Inset Map 15	0	0	0	0	0	0	0	0	0	0
PC020/MK: Figure 6	0	0	0	0	0	0	0	0	0	0
PC021/MK: New Figure 7	0	0	0	0	0	0	0	0	0	0
TOTAL	281	169	112	26	255	25	84	78	64	4

APPENDIX 3

Table 4 – List of Specific and General Consultation Bodies

Specific Consultation Bodies

- Statutory Organisations:
 - Government Agencies
 - Statutory Undertakers
 - Transport Organisations
 - Health Services
 - Emergency Services
 - Education
 - Environment
 - Local Government – in and adjoining West Northamptonshire including Councillors

General Consultation Bodies

- Business Interests

- Community Groups including:
 - Allotment Associations
 - Cultural Interests
 - Conservation
 - Disabled Interests
 - Ethnic Groups
 - Faith Groups
 - Gypsies and Travellers
 - Voluntary Interests
 - Youth

- Developers

- Housing Associations

- Landowners

- Local Strategic Partnerships

- MPs/ MEPs

- Private Individuals

- Professional Organisations including Agents

- Residents Associations

- Town and Parish Councils in and adjoining West Northamptonshire

APPENDIX 4

Table 1 – Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 3 – Introduction

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC003/I	New Paragraph 3.10	4	36	<ul style="list-style-type: none">• A number of representations offer general support for the Proposed Changes.• Particular support is expressed for the principles of sustainable development, the policy stance on gypsy and traveller provision, the focus on cross-boundary issues, and the extensive work on infrastructure delivery.• The document is unsound as a number of key considerations are missing from the process of developing the strategy. These considerations include physical factors, geographical features, technological development, economy of scale and specialism, personal choice and the need to provide for car travel.• There is no evidence within the JCS that local people and local councils can prepare their own local plans and neighbourhood plans in accordance with the National Planning Policy Framework (NPPF).• The Joint Planning Unit has failed to consult the local community on the implications of the NPPF for the JCS.

APPENDIX 4

Table 1 – Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 3 – Introduction

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The plan periods and time horizons do not comply with the NPPF.• Whilst the wording in Paragraph 3.10 is supported, the JCS should include a specific policy on the presumption in favour of sustainable development, along the lines of the 'model policy' produced by the Planning Inspectorate.• Detailed wording changes are proposed to the second, third and fourth sentences to ensure a 'reasonably' positive approach to the general presumption in favour of sustainable development.• The changes are not sustainable. Further greenfield development should not be allowed until empty homes and brownfield sites have been used.• The requirement for sustainable development should be applied rigorously and existing farmland should be preserved.

APPENDIX 4

Table 1 – Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 4 – Spatial Portrait, Vision and Objectives

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC006/S	Objective 16	5	7	<ul style="list-style-type: none">• The new objective is supported and welcomed.• A further minor amendment is proposed that recognises the role that the historic environment has in providing a sense of place and local distinctiveness in both rural and urban locations. This would better reflect the Paragraphs 58 (fourth bullet point) and 126 of the National Planning Policy Framework. New wording is proposed.• In its current form the objective implies that rural and urban heritage assets perform a different function and should be valued differently. These assets should be protected in rural as well as urban areas and they contribute to local distinctiveness in urban as well as rural areas. The use of the word "important" is subjective and not helpful. New wording is proposed.• This objective should also embrace the intrinsic value and character of the countryside surrounding villages. There is also a need to ensure that villages, such as Brixworth, remain as a single community and stay predominately rural in nature.

APPENDIX 4

Table 1 – Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 4 – Spatial Portrait, Vision and Objectives

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• Changes are suggested to the wording of the objective to add reference to carefully managed change “where necessary” and the “important” role of rural heritage assets “(including the intrinsic value of the open countryside)”.

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC020/SS	Policy S5	6	35	<ul style="list-style-type: none">• The proposed changes result in a reduction of 1,030 dwellings on the sites identified under Policy S5. The JCS should set out where these dwellings will now be provided. Land to the west of Brackley could accommodate a large proportion of the 1,030 dwellings no longer provided and meet residual requirements in Brackley.• A further SUE is proposed at East Wootton (Northampton East) to address the shortfall created by the dwelling reduction in Policy S5.• Policy S5 should be amended to uplift the housing allocation in the Brackley East SUE to 460.• The Daventry North East SUE should be reduced by 1000 and reallocated to a smaller sustainable Daventry South East SUE. This would reduce the delivery risks.• There is a shortfall of 7,715 houses which should be allocated to Northampton North SUE, Daventry South East SUE, and Towcester Burcote SUE.• An additional housing allocation of circa 5,000 dwellings is required in Northampton to account for a 20% non-implementation allowance and a 15 year housing supply following the adoption of the JCS in 2013.• The plan period should be extended to 2031.

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The 'red line' SUE allocations should be deleted and replaced with broad diagrams.• The reallocation of 500 dwellings from Daventry town to the rural area is questioned. Rural areas have also been hit by the downturn in the housing market and there is no evidence of additional need.• The change to reduce the number of dwellings for the Northampton Kings Heath SUE is not supported and the 3,500 dwelling figure should be reinstated.• The reduction in the housing number for the Northampton Kings Heath SUE is appropriate having regard to known constraints.• Object to the employment land provision in Policy S5. This policy should include reference to a strategic employment land allocation at Junction 16.• The decision to delete the specific 7 ha employment allocation from the Northampton North SUE is questioned. This adds to previous concerns that employment provision within the SUEs is unclear and threatens their sustainability. Additional strategic employment sites, such as land at Arm Farm, Blisworth should be allocated.• The reallocation of the 7 ha employment allocation from Northampton North is appropriate given the relocation of the Technology Realm to the Enterprise Zone.

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none"> • The proposed change to replace the reference to job numbers with 15.5ha of employment land at the Towcester South SUE is supported. • The policy is supported in principle.
PC022/SS	Policy S6	6	35	<ul style="list-style-type: none"> • The Proposed Changes to the Delivery and Contingency section are welcomed as greatly strengthening the role of monitoring and review, and addressing previous deficiencies in the plan. Key stakeholders expect and welcome continued engagement to support the monitoring and review process in seeking to address delivery issues. • The Proposed Changes are welcomed as providing a more realistic framework and profiled trajectory that can be used to assess delivery and clarify the targets on which the 5 year housing land supply will be based, including taking account of the continuing effects of the recession. The opportunities for premeditative action if under-delivery is identified are also recognised. • The inclusion of the 'Delivery and Contingency' Section is welcomed. The principles set out as part of the approach are considered to help delivery of critical areas of the plan to be actively measured. It is recognised this approach will provide the JCS with important scope for flexibility and adaptability. • The principles of monitoring are supported but comments are raised regarding the potential expediency and effectiveness of potential remedial action to identified problems:

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">○ The Proposed Changes do not guarantee that any issues with delivery are reported expediently due to the time-lag of recording development activity through the monitoring report. The policy should be explicit about the reasonable period allowable before contingency measures are required to take effect;○ The provisions under Paragraph 5.35 should be expanded to recognise the potential for Compulsory Purchase Orders and the potential requirement to relax other policy requirements. These should also be present in the text of Policy S6; and○ The list of measures to be considered in the text of Policy S6 should be clarified in terms of whether they form a hierarchy. Greater emphasis should be placed on the identification or review of land allocations in the case of a delivery shortfall, rather than instigating a review of targets.● The requirement to maintain a five-year supply of deliverable land for housing should be included explicitly in Policy S6. An additional measure relating to the granting of planning consent on unallocated sites when a deficit is demonstrated against the housing trajectory should be added to the existing measures in the text for Policy S6.● It is contested that the projections for delivery in Tables S6A and S6B, taken from Policy S3 and Appendix 3 ('the housing trajectory') are potentially optimistic and over-generous as a number of sites cannot be shown as deliverable with a degree of certainty. In order to ensure flexibility and positively support delivery of the level of development set out in the phasing tables it is recommended that the contingency policy is

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<p>expanded. This change should allow housing development to be considered on land within or on the edge of settlements in accordance with the spatial strategy including those identified as suitable within the Strategic Housing Land Availability Assessment (SHLAA) and land allocated for employment uses where it is proven that no demand exists.</p> <ul style="list-style-type: none"><li data-bbox="1055 667 2051 863">• The part of the Proposed Change relating to: “The completion of Serviced Employment Floorspace, the creation of jobs and the availability of land for employment use in the future” does not provide for monitoring by location in the same way as housing. This should be included as an essential component to ensure contingency measures are accurately directed at the specific employment needs of a given area.<li data-bbox="1055 906 2051 1007">• With regards to monitoring the outcome of developments in Paragraph 5.35 (final bullet point), it is suggested that the words: “community and fire safety” should be included to ensure these issues are addressed.<li data-bbox="1055 1050 2051 1214">• To provide for flexibility the revised housing figures in Tables 6A and 6B should be prefixed by the word: “about”. This is considered necessary so the policy has full regard to the National Planning Policy Framework (NPPF) and takes into account recommendations from the Harman Report (June 2012).<li data-bbox="1055 1257 2051 1378">• A footnote is required to explain that Table 6A as presented does not provide an appropriate means of assessing the five year forward supply of deliverable housing land required in future years. This is important in order to recognise that the rate of housing delivery required will be

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<p>updated in-line with the Policy S3 totals and Appendix 3 (the housing trajectory). The following footnote is suggested: “The above figures are based on the trajectory of anticipated housing completions in Appendix 3 of the Plan, 2011 onwards. Over the plan period the trajectory and therefore these guideline figures will change. The figures do not provide the appropriate basis for determining the five years housing land requirement for the purposes of assessing the five years supply of deliverable housing land.”</p> <ul style="list-style-type: none"> • It is also unclear whether the phasing and apportionment of housing is to act as a monitoring tool or whether it is to be used as a ‘cap’ on development within the 5-year time periods identified. • It is considered appropriate, having full regard to the National Planning Policy Framework (NPPF) that the phasing of development demonstrated in Tables S6A and S6B should also include an additional 20% buffer to account for persistent under-delivery in recent years. • The level of 12,055 dwellings (including the Northampton Related Development Area) is considered inadequate and does not properly reflect the higher level of housing growth that should be provided having regard to the most up to date evidence basis. • Tables S6A and S6B do not address the inadequacy of the housing provision. Tables S6A and S6B should include an additional housing provision for the period 2026 to 2031 together with broad locations for growth during this period.

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC031/SS	Policy S7	12	17	<ul style="list-style-type: none">• The Proposed Change takes account of the changes in the demographic figures that have become available since the initial pre-submission stage. The higher figure ensures enough jobs are provided locally to discourage unnecessary outward migration due to a potential lack of local employment opportunities. It will also support the opportunities provided by the Central Area Action Plan and the Northampton Waterside Enterprise Zone designation. The Proposed Change is welcomed.• The increased jobs provision is supported.• Objects to jobs number linked to assumption that housing delivery to be constrained in the early years of 2011-2026.• Consider the increase in provision of jobs from 16,000 to 19,000 is a positive change to the Plan, which helps promote economic growth, reduce out commuting and addresses the job losses experienced since 2008. But should not let scale of housing provision suppress jobs.• The Joint Core Strategy does not acknowledge that the trend growth in warehouse and distribution employment will continue in the future.• Warehousing and distribution provides high levels of inward investment into West Northamptonshire.

APPENDIX 4

Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 5 – Spatial Strategy

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				<ul style="list-style-type: none">• Support the principle of a minimum approach to job creation, though the reason for the adjustment of this figure and timescale is to reflect more recent demographic and job data since the Pre-Submission JCS. This does not convey the aspiration to meet the demands of key growth sectors.• Increase broadly supported as revised planning application for Towcester South SUE provides sufficient employment land together with employment to be generated in the community uses for there to be one new job for every house. It is noted in Paragraph 4.17 of the Joint Core Strategy that West Northamptonshire has a broad economic base but caution needed on office development.• The strategy for employment provision is not 'positively prepared' as it is predicated upon failure to deliver the required amount of housing land. Lack of evidence to support the level of jobs provision.• A robust target for job creation should be explicit for 2010 to 2026 not backdated to 2008. The lengthening of the review period creates a false impression that the JCS is providing for a significant increase in jobs Should use target of 1187 pa and period of 2010 to 2026.• Proposed Changes reflect the allocation of Northampton Waterside Enterprise Zone. This has presented a new strategic focus for employment opportunities within Northampton and sensible removal of the employment allocation within Northampton North Sustainable Urban Extension to a more sustainable location. This has also resulted in an

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				<p>increase in likely job opportunities. These Changes are welcomed.</p> <ul style="list-style-type: none">• The 19,000 jobs target cannot be met from the arbitrarily low housing target adopted.
PC039/SS	Policy S8	12	22	<ul style="list-style-type: none">• Supports the increased emphasis on the Northampton Waterside Enterprise Zone as this is considered to be a sustainable location for new employment.• Supports the new opportunity and pre-eminence to be given locally to the Northampton Waterside Enterprise Zone, while recognising the significant role that the existing substantial employment areas such as Brackmills, Moulton Park, Pineham and Lodge Farm will have in creating additional jobs.• Encouraging business investment needs a framework for the distribution of jobs in West Northamptonshire.• No evidence base to show the Joint Planning Unit is working with the business community.• Respond to dynamics of the logistics industry and allocate M1 Junction 16 land.• The assumption that SEMLEP Waterside Enterprise Zone should be used to encourage start-up companies is inconsistent with the desire of one of the landowner's in the Enterprise Zone for large headquarters use on their site.

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				<ul style="list-style-type: none">• The Avon Nunn Mills sites should be identified separately from the rest of the SEMLEP Waterside Enterprise Zone either as a mixed use scheme or as a location for a new University Campus.• Question what the Joint Core Strategy intends by: “Local Employment” while no new office development sites are required and that sufficient land is available for manufacturing and no new warehousing sites are to be allowed. Proposed Change (PC005/T) attempts to provide further information regarding employment development at the Towcester South SUE having regard to the deletion of job numbers from the policy text and their replacement with a specified area of employment land. The revised planning application is consistent with both the Towcester Master Plan produced by South Northamptonshire Council and the Joint Core Strategy. The JCS should explain what is to be facilitated and provide the widest possible scope for employment generation in the Sustainable Urban Extensions including Towcester.• In order to secure the B8 delivery and non-B8 growth, the Council needs to be pro-active in meeting demand for B1 uses in edge of urban locations such as land at Bedford Road, Northampton. There needs to be a wider choice of allocations and the Bedford Road site is under control of a developer with a successful track record of developing such sites.• Proposed Changes reflect the allocation of Northampton Waterside Enterprise Zone. This has presented a new strategic focus for employment opportunities within Northampton and sensible removal of the employment allocation within Northampton North Sustainable Urban

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				<p>Extension to a more sustainable location. This has also resulted in an increase in likely job opportunities. These Changes are welcomed.</p> <ul style="list-style-type: none"> • No evidence base for level of jobs provision within Policy S7 or Policy S8 to show the Joint Core Strategy has been prepared from a “clear understanding of business needs within the economic markets operating in and across their area” or substantiate if the Joint Planning Unit is working “closely with the business community to understand their changing needs and identify and addressing barriers to investment”. • The distribution of jobs (Policy S8) fails to identify and respond to the dynamics of the logistics industry, in relation the locational demands for sites well served by the strategic highway network. • Opportunity to attract major inward investment –within the rapidly expanding logistics sector, on land at Junction 16 of the M1 within South Northamptonshire. None of the sites identified under Policy S8 for South Northamptonshire are suitable for this scale and form of development. • To ensure consistency with Northampton Central Area Action Plan (CAAP), additional wording referring to the University and educational use at Waterside insert ‘educational use connected with the University of Northampton would also be acceptable in principle.’ • Add to Paragraph 6.11.4: “educational use on part of the site would be acceptable in principle” - In view of the economic and cultural importance of the University and links to the Town Centre.

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				<ul style="list-style-type: none"> • The University is considering relocating to Waterside (Avon/ Nunn Mills site) in the town centre to provide the University with state of the art facilities and to create a better relationship with the town centre enabling it to compete with other Universities and generate economic benefits from its linkage with the town centre. A town centre site is an appropriate and sustainable location for a University campus. • Support the relocation of the Technology Realm Framework from Northampton North SUE to the SEMLEP Northamptonshire Waterside Enterprise Zone as accords with the University’s potential relocation to Waterside (Avon/ Nunn Mills). • Policy S8 should include reference to the employment, tourism, education, and leisure development at Silverstone Circuit as specified in Policy E5, the approved Development Brief for the Circuit and the outline planning permission now granted for the development. Policy S8 should be amended by the addition of: “and further employment, tourism, education and leisure development” after “high performance technology motorsport cluster”.
PC054/SS	Table 2	14	1	The Table should incorporate a note confirming that the capacity projections will be regularly updated to reflect the prevailing economic climate.
PC055/SS	Table 2	14	1	The Proposed Change is supported.
PC056/SS	Table 2	14	1	The Proposed Change is supported.
PC057/SS	Table 2	14	0	No representations received.

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PC067/SS	Policy S10	14	32	<ul style="list-style-type: none">• Although the Code for Sustainable Homes (CSH) and BREAM targets have been removed, they have been placed in Policy S11, so still remain in the Plan. Whilst the removal of the 10% target for renewable energy use might be seen as a retrograde step, the flexibility provided by the scoring system of the environmental performance targets transferred to Policy S11 gives the potential for the best solutions to be devised for individual sites according to its circumstances. Measures to reduce energy and resource use are much more effective and affordable in reducing greenhouse emissions than transferring the generation of non-reduced levels of power requirements to sustainable/ low carbon sources. The policy still seeks to maximise the generation of energy from decentralised and renewable or low carbon sources, but balances these against the competing priorities for enhanced environmental performance.• Supports the Proposed Change but suggests a minor amendment that highlights the importance of setting in relation to delivering sustainable development as set out in the National Planning Policy Framework.• Although the comment about providing flexibility is noted, for reasons of certainty, there should be the retention of a 10% target for a development's energy requirement to be met from decentralised and renewable or low carbon sources. As drafted there is no metric against which this aspect of the policy could be monitored. The alternative option, which reflects the National Planning Policy Framework, is to refer to any such energy provision being consistent with national standards. This would be the preferable approach to adopt.

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				<ul style="list-style-type: none">• Support for the following bullet point in the policy: “to maximise the generation of energy from decentralised and renewable or low carbon sources.”• Policy S11 is not sound or consistent with national policy. The policy is also vague. The policy needs to be recast as a high quality design policy, something that is presently missing from the Joint Core Strategy having regard to the National Planning Policy Framework.• Support the reference in Policy S10 to sustainable design incorporating safety and security. To enhance Policy S10 further it is recommended that reference to the adherence of the principles of ‘Secured by Design’, in order to prevent crime and anti-social behaviour (ASB) and reduce fear of crime, is inserted as a sub-point within the policy itself.• Deleting the reference to viability removes the necessary flexibility from the policy, thereby reducing its effectiveness and is in conflict with the NPPF and its focus on deliverability of economic growth and development.• Greater clarity is required in Policies S10 and S11 in relation to financial contributions towards off-site energy generation including using consistent terms and appropriate definitions. In addition, in the context of consistency with zero carbon, the draft building policies are broadly: “consistent with zero carbon and nationally described standards” as required by the National Planning Policy Framework.

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				<p>However, ensuring consistency between local planning policy and the national definition of zero carbon contained in the Building Regulations is difficult when national definitions remain subject to change. In addition, the Government has recently announced a review of all building standards, including zero carbon. The uncertainties should be noted in the Joint Core Strategy and future commitment to review made so as to ensure continued consistency. Similarly, reference to ‘allowable solutions’ might need to change should this element of ‘zero carbon’ be dropped or changed by Government.</p> <ul style="list-style-type: none">• Sustainability standards for new buildings/ developments are referred to in both Policies S10 and S11. While the bulleted list of principles in Policy S10 is helpful as a way of illustration of what is meant by sustainable development, a number of these will be dealt with through compliance with Policy S11’s requirement to achieve Code for Sustainable Homes Level 4 and BREEAM Very Good. For clarity, reference should be made in S10 to the use of S11 to achieve the relevant standards.• No reference is made to development management for these policies. It would be helpful to clarify what is required by way of submission with a planning application to demonstrate compliance at different stages of the planning and development process.• Achieving the highest standards of sustainability needs to be balanced by viability and deliverability, and the need to provide for other requirements such as infrastructure and affordable housing that may impact on the

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				<p>viability (and deliverability) of proposals. A number of the bullet points in Policy S10 either repeat or contradict other policies in the Core Strategy, such as the desire for housing to meet requirements from the Code for Sustainable Homes. A clearer and more flexible approach would be to remove the detail of this policy from the Core Strategy.</p> <ul style="list-style-type: none">• The fact that Policy S10 no longer proposes to specify a particular code level is supported (although it is noted that Policy S11 now seeks this). These are matters for the Building Regulations and hence we have made representations on S11. However, the policy should be clearer that sequentially it would be preferable to first improve the energy efficiency of buildings rather than simply ‘maximising’ on-site renewable or decentralised energy, which risks being interpreted too rigidly.• Certain changes to Policy S10 are supported including the deletion of any reference to the Code for Sustainable Homes which is a matter for other legislation and the deletion of the reference to a 10% target which is not considered effective. However, other Proposed Changes to Policy S10 are not considered effective. In particular, all the bulleted points are requirements and impact on viability. The policy and should be flexible to deal with changing circumstances and needs to better reflect viability and deliverability. In order for the policy to be sound the previous viability caveat in the policy should be reinstated.• Parts of policy repeat or contradict other policies in the JCS or are vague and it is unclear as to what is expected, a clearer and more flexible approach would be to remove the detail of this policy form the JCS.

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				<ul style="list-style-type: none">• Concern that the policy requires greater flexibility to encourage development and innovation and to strike a balance between policy aspirations, economic viability and deliverability.• There should be retention of the 10% target for a development's energy requirements to provide greater certainty and monitoring. The alternative option is to refer to any such energy provision being consistent with national standards.• Support for the existing policy, specifically to maximise the generation of energy from decentralised and renewable or low carbon sources.• Support for the policy changes that accord with the National Planning Policy Framework and considers that the sustainable development principles contained within the policy are reasonable and justified.• Support for the efforts to reduce energy and resource use, rather than transfer of generation of non-reduced levels of power requirements to other low carbon sources.• Support for the additional requirements to Policy S10 for development to be designed to improve environmental performance, energy efficiency and adapt to climate change and protection and enhancement of the natural environment, green infrastructure networks and biodiversity.

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				<ul style="list-style-type: none"> The policy should seek to focus development in existing commercial areas thereby maximising potential to use existing travel patterns and promote linked trips in accordance with the requirement to secure transition to a low carbon future. Some respondents propose minor amendments to the wording of the policy.
PC070/SS	New Paragraphs 5.86 and 5.87	16	6	<ul style="list-style-type: none"> Onshore wind energy should only be considered if the long term viability of projects can be shown to be sustainable without subsidy. Support the approach of “fabric first”, but cannot support combined heat and power at district level which is referred to in Paragraph 5.91 and from 2016 the Government proposes that all new homes will meet the zero carbon homes standard. The Proposed Change cannot be justified and is not effective. The Proposed Change does not have regard to viability. A more flexible approach should be applied recognising that viability is a key factor, as set out in the Harman Report and having regard to the National Planning Policy Framework. The second sentence of paragraph 5.86 should be omitted: “With the exception of Northampton, onshore wind energy forms the largest potential renewable resource for West Northamptonshire.”
PC074/SS	New Paragraphs 5.88 and 5.89	17	8	<ul style="list-style-type: none"> Broadly supports the inclusion of new text at Paragraphs 5.88 – 5.89. It is important when considering the delivery of wind energy, in particular, that a distinction is made between ‘potential’ and ‘deployable’ locations for wind energy generation; the latter being influenced by other environmental constraints, including the historic environment. While

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				<p>reference is made to: ‘historical and cultural features’ in Paragraph 5.89 it is recommended that some changes are made to the wording to better reflect the National Planning Policy Framework (NPPF) and to recognise the importance of considering the impact on the significance of heritage assets affected, including their setting (paragraph 128 of the NPPF), that often results from renewable energy proposals.</p> <ul style="list-style-type: none">• The proposed new paragraphs are negatively written and focus solely on the potential effects of renewable energy. In terms of wind energy, the policy needs to reflect the full range of benefits, as follows:<ul style="list-style-type: none">○ Reaching the UK’s renewable energy generation targets;○ Climate change mitigation;○ Ensuring the security of energy supply;○ Stabilising energy prices to the customer and reducing fossil fuel dependence; and○ Job creation and other economic benefits.• Additionally, the reference to ‘high quality design’ needs to be amended as it is currently not clearly worded. It refers to using: “high quality design to minimise impacts on the amenity of the area, in respect of visual intrusion, noise, dust and odour and traffic generation.” It is considered that high quality design will not have an effect on traffic generation, for example. Furthermore, wind turbines have design characteristics which cannot be altered due to their functionality and should therefore be exempt from this requirement.

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				<ul style="list-style-type: none">• Questions the evidence to include rural diversification as an important consideration in relation to wind energy generation. Suggestion of a new paragraph to ensure that the cumulative impacts of present and future wind energy proposals are assessed.• Support the approach of “fabric first”, but cannot support combined heat and power at district level which is referred to in Paragraph 5.91 and from 2016 the Government proposes that all new homes will meet the zero carbon homes standard. The Proposed Change cannot be justified and is not effective. The Proposed Change does not have regard to viability. A more flexible approach should be applied recognising that viability is a key factor, as set out in the Harman Report and having regard to the National Planning Policy Framework.
PC075/SS	New Paragraphs 5.90 and 5.92	18	4	<ul style="list-style-type: none">• Support the approach of “fabric first”, but cannot support combined heat and power at district level which is referred to in Paragraph 5.91 and from 2016 the Government proposes that all new homes will meet the zero carbon homes standard. The Proposed Change cannot be justified and is not effective. The Proposed Change does not have regard to viability. A more flexible approach should be applied recognising that viability is a key factor, as set out in the Harman report and having regard to the National Planning Policy Framework.
PC076/SS	Policy S11	19	37	<ul style="list-style-type: none">• The impact of the policy on viability and deliverability of new development is questioned.• The proposed the use of combined heat and power at district level, Code Level 4 and Very Good BREEAM standards is not justified or effective.

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				<ul style="list-style-type: none">• Unless there is a more flexible approach adopted recognising that viability is a key factor as set out in the Harman Report the policy is considered to be unsound.• The Code for Sustainable Homes and Zero Carbon Homes are being delivered via other Government initiatives and so should not be included in the JCS.• Support for consistency of draft policy with zero carbon standards, but want uncertainties over future Government policy and use of “allowable solutions” to be included in JCS.• Consider the policy is too broad; leading to confusion of purpose. A separate wind energy/ biomass facilities policy is suggested.• Suggestion of a reference in draft policy S10 to the use of S11 to achieve the relevant standards and need for greater clarity on development management submission requirements to demonstrate compliance.• The text and policy should reflect the full range of benefits of wind energy and include the assessment of cumulative impacts of wind energy.• The policy should distinguish between large-scale proposals and small-scale schemes.• Delete the policy or relate an amended policy wholly to renewable/low carbon energy generating proposals.

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				<ul style="list-style-type: none">• The policy sets the “bar” unreasonably high by requiring wind energy proposals to have no significant adverse impacts, when most if not all proposals will have some adverse impacts.• Concern that the policy is too negatively written and is likely to unduly restrict wind energy development contrary to national policy.• Concern that the benefits of renewable energy are not adequately reflected in the JCS.• Key national planning policy and renewable energy policy documents should be referenced in the JCS.• The need to develop standalone renewable energy schemes should be recognised in the policy.• All wind energy proposals should be time-limited in line with Government policy.• The policy should include a clear viability and technical feasibility caveat for schemes that cannot meet the set requirements and make reference to “allowable solutions” which will be crucial in achieving higher levels of the Code for Sustainable Homes.• Propose major amendments to the policy including deletion of the first and last three paragraphs as these replicate the requirements of Policy S10.

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				<ul style="list-style-type: none">• The use of terms such as Community and or Private Energy Funds should be consistent and appropriate definitions supplied.• Ensuring consistency with zero carbon standards is difficult when they remain subject to change and in the light of the Government review of all building standards, including zero carbon.• Further clarity is sought on the information which planning applications will have to include in order to comply with the policy. If a development cannot meet the required standards then it should not be permitted.• Minor amendments to the wording of the policy are suggested to recognise the 'significance' of heritage assets, refer to the security elements of the Code and the introduction of BREEAM communities.• Support expressed for requirements relating to low carbon and renewable energy and the impacts on landscape, townscape, natural, historical and cultural features and nature conservation interests.• Support expressed for the requirement that the design and location of major development should minimise impacts on the natural environment, biodiversity and landscape.

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Section 6 – Connections

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC018/C	Policy C3	24	6	<ul style="list-style-type: none">• Supports the proposed change to Policy C3 which reflects a representation made in respect to this Policy.• A further change to the supporting text to Policy C3 is required at Paragraph 6.20 (after second to last sentence) to provide consistency with the amended Policy C3 as follows: “A43 junction improvements are required to enable housing and employment growth including at Towcester, Silverstone and Brackley in South Northamptonshire. The specific developer funded measures on the A45/A43 are set out in the Infrastructure Schedule in Appendix 4 of this Plan.”• It is noted that Policy C3 refers to: “M1 junction 14-19 Managed Motorways including hard shoulder running”. Although not now in a proposed programme, it is considered that it is reasonable to expect that such an improvement is likely to come forward during the plan period.• The policy now makes reference to the agreement between the Highways Agency and the Councils on how to fund improvements to the strategic road network to allow development to proceed. This is a reflection of the significant advances that have been in addressing the issue of the Highways Agency

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				<p>using Article 14 directions to stop planning permission being granted which was holding back delivery of sites. The inclusion of recognition of the Growth Management Strategy is welcomed as it is sure to provide more certainty about delivery of improvements to the strategic road network which will allow development identified within the Plan to come forward.</p> <ul style="list-style-type: none">• Request for clarification and confirmation that statements in Policy C3 and the supporting text do not constitute any future road infrastructure between Great Billing interchange and the M1.• Previous representations remain valid, i.e. add reference in Policy C3 to the South Towcester bypass and related A43 improvements.• There is a need to improve access to various parts of Northampton from the A14 and villages on the A508.
PC019/C	Policy C3	24	3	<ul style="list-style-type: none">• The reference to the A43 reflects the County Council's desire to see this road dualled as set out in the Northamptonshire Arc. This proposed improvement however is not necessary in relation to the development proposed in the Core Strategy and will require funding from other sources to ensure its delivery.

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				<ul style="list-style-type: none">• Previous representations remain valid, i.e add reference in Policy C3 to the South Towcester bypass and related A43 improvements.

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Section 8 – Economic Advantage

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC009/E	Policy E3	25	4	<ul style="list-style-type: none">• It is believed that the economic advantage of the area is linked inexorably to those comments made under Spatial Strategy.• The size of the employment area has been reduced in the Northampton North SUE and it is considered not a viable location for the Technology Realm. The Enterprise Zone designation, particularly in association with the University led Innovation Centre and potential campus move, provides a better opportunity for a successful Technology Realm. It will be able to feed off these academic links and the high performance technology emphasis of the Zone.• The change from a 7ha employment site for a technology realm at the North Northampton SUE, to a 120ha site next to the River Nene in central Northampton represents a massive shift in the employment land allocation in West Northamptonshire. By locating such a large proportion of new employment land in one place, the JCS is not providing the flexibility for businesses to decide where they would like to locate to meet their individual needs and requirements contrary to Paragraph 21 of the National Planning Policy

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				<p>Framework. JCS is over reliant on providing new jobs on existing sites and the SEMLEP Northampton Waterside Enterprise Zone limiting ability to respond to business demand in the market. A preferable option would be to identify additional employment land allocations in order to create headroom for the JCS. In this way, the JCS will have created a contingency for any significant changes in the market and provided businesses with the flexibility and certainty to invest in the area.</p> <ul style="list-style-type: none">• Support the Proposed Change that refers to the Waterside Enterprise Zone as a Technology Realm instead of Northampton North. However, this policy should make reference to education as being compatible with this designation and acknowledge the synergies between the two. This change is required to ensure that the plan is effective and deliverable and accords with the objectives set out in the National Planning Policy Framework.

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Section 9 – Housing

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC003/H	Table 4	27	13	<ul style="list-style-type: none">• The validity of the information in the table is questioned.• The requirement for affordable housing in Policy H2 should be reduced in line with the updated evidence set out in Table 4.• The figures do not appear to correspond with the housing requirement in Table 1.• The table should identify housing provision up to 2029 or 2031.• The housing supply is inadequate and does not meet the full and objectively assessed needs for market and affordable housing.
PC011/H	Policy H2	27	41	<ul style="list-style-type: none">• The percentage targets for affordable housing should be removed as they are not justified having regard to project economics and viability. Reference is made to the National planning Policy Framework (NPPF) and the Local Housing Delivery Group report: 'Viability Testing Local Plans' in support of this argument.• The evidential basis for the affordable housing requirements, particularly the Strategic Housing Market Assessment (SHMA), is challenged.

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				<ul style="list-style-type: none">• Further information regarding the SHMA should be included in the JCS and not hidden away in a technical paper.• The measures proposed in the JCS do not adequately nor robustly test affordability.• The affordable housing targets for Daventry District, including the split between Daventry Town and the rural area are challenged on the following grounds:<ul style="list-style-type: none">○ The higher quota for rural areas should not apply to the larger villages or large/ medium sites.○ The split urban/ rural target is contrary to the strategy of concentrating development in Daventry town.○ Affordable housing should be focussed in Daventry where transport and services are available.○ The 40% target for rural areas is too high and is a top down approach which does not reflect the needs of individual communities.

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				<ul style="list-style-type: none">○ The target and the site size threshold are not viable and will not deliver additional affordable housing.○ The delivery of affordable housing on sites below the 5 dwelling threshold should be considered on a site by site basis.○ The affordable housing requirement for the Northampton Related Development Area should be reduced from 35% to 27.5%.
PC012/H	Existing Paragraph 9.14 and Policy H3 (New Paragraphs 9.18 and 9.19)	28	5	<ul style="list-style-type: none">● Further wording changes proposed to clarify the scale of sites (dwelling numbers and size of sites) that are covered by the policy, to ensure that the scale of market housing is: ‘no more than the minimum required’, and to ensure that all affordable housing is retained in perpetuity.● Minor wording change to the policy to ‘generally’ support subject to ‘environmental impact’● Stringent controls are required to ensure that developers are not given a loophole to build market housing on exception sites.● The policy and supporting text should indicate that in certain circumstances rural exception sites may be of a larger scale and should also

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Section 9 – Housing

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				acknowledge that previously used sites may come forward which have not been identified in the Strategic Housing Land Availability Assessment (SHLAA).

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Section 10 – Built and Natural Environment

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC017/BN	Policy BN3	32	3	<ul style="list-style-type: none">• Call for greater recognition of the balance between woodland creation and enhancement and meeting development requirements in the JCS.
PC027/BN	Policy BN4	33	5	<ul style="list-style-type: none">• Question the justification for the policy to require all development to have no significant impact on birds within 250m of the Special Protection Area. This requirement is onerous. The scale of the development needs to be taken account of and the policy applied only to development large enough in scale that might be adversely affecting birds.• Support for the more focused buffer zone rather than the previously identified more extensive buffer zone.• Support that the JCS will result in no likely significant effect of any European site.• Support for reduction of the buffer zone to 250m and protection of bird foraging to the south.• The words: ‘no significant adverse effects’ should be replaced with: ‘no adverse effect on integrity’, to reflect the Regulations.

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Section 10 – Built and Natural Environment

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC053/BN	New Policy BN7A	35	11	<ul style="list-style-type: none">• Support for the new policy as it seeks to deal with recognised local water issues and support sustainable development taking account of the Water Cycle Study.• The provisions of the policy relating to wastewater treatment capacity and the use of sustainable drainage systems are welcomed.• Objection to the requirement to achieve Level 4 standards for water conservation in Code for Sustainable Homes. This is inconsistent with national policy because the Code is being delivered via other Government initiatives and does not need to be included in the JCS.• The application of water conservation element could impact on viability and deliverability of development.• Existing water infrastructure should be upgraded rather than add further housing to current overloaded system to protect and enhance existing water quality.• The need for adequate information to demonstrate that water quality standards can be protected is emphasised in order to meet the

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Section 10 – Built and Natural Environment

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				<p>requirements of the Water Framework Directive and ensure that compliance is not compromised.</p> <ul style="list-style-type: none">• The policy should be amended to conclude with the words: 'to ensure that water quality is protected, and as far as is practicable, improved.'• No development should be allowed to reduce water quality.• The policy should ensure adequate water supply and hydrant provision for fire-fighting.
PC054/BN	Policy BN7	36	5	<ul style="list-style-type: none">• Support for the policy that provides clarity on a number of locally specific issues to the area and reflects current good practice.• A specific reference to the requirements of the West Northamptonshire Strategic Flood Risk Assessments should be included to ensure new developments are designed to contribute to overall betterment, in addition to protecting new and existing development from residual risk of fluvial flooding.• Support for the policy to ensure adequate wastewater treatment capacity is available to address capacity and environmental constraints.

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				<ul style="list-style-type: none">• The wording of the policy should specify that only 'statutory' bodies can trigger the requirement for a flood risk assessment.• It is vital that consideration is given to flood risk during the master-planning stage.
PC060/BN	Policy BN9	39	2	<ul style="list-style-type: none">• Generic policy does not add much compared with the National Planning Policy Framework, therefore this policy requires more locally specific references.• The policy is not effective and should be recast to separate out those developments which might generate pollution and those which might need to take into account the effects of pollution.

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Section 11 – Infrastructure and Delivery

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC014/ID	Policy INF2	41	17	<ul style="list-style-type: none">• Supports the amended Policy INF2 and welcomes the improved clarity that the change provides.• The removal of the reference to the SPD and its slimming down essentially loses the locally distinctive element to this policy. The policy could be made more locally distinctive by giving a prioritisation list of S.106 items or consider its removal.• The first line of the policy whilst not being proposed for amendment is a concern as it appears at face value to be inconsistent with the spirit of paragraph 205 of the NPPF in relation to preventing planned development stalling.• The changes proposed to Policy INF2 do not go far enough. The policy remains unjustified and ineffective. The policy requires further changes as set out in Pre-Submission consultation response.• In accordance with Paragraph 173 of the National Planning Policy Framework the policy should be amended to recognise that the amount of contributions required from developers will not be such that proposals in the

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				<p>plan are made unviable. Add sentence to the end of the policy to read:</p> <ul style="list-style-type: none">○ “CONTRIBUTIONS FROM DEVELOPERS WILL NOT BE SOUGHT SUCH THAT DEVELOPMENT PROPOSALS WITHIN THE PLAN BECOME UNVIABLE.” <ul style="list-style-type: none">• The draft Policy INF2 goes beyond a high level strategy and seeks to provide more detailed development policies. It is entirely inappropriate to produce a Core Strategy which relies upon the provision of strategic infrastructure through the implementation of a Community Infrastructure Levy at a stage when no evidence is available. The policy should be deleted.• Major revisions to existing infrastructure would be required prior to any further expansion.• There has been significant work undertaken on the Infrastructure Delivery Plan which now identifies the key infrastructure projects required to deliver the level of growth proposed by the Joint Core Strategy and its spatial distribution, together with estimated costs and potential funding sources. This additional work is strongly supported and reflects a number of our comments to the Pre-Submission Draft in

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				<p>relation to Policies C3, C4 and N3 which considered that more detail was needed on the identified infrastructure improvements, to provide a robust delivery framework for the JCS.</p> <ul style="list-style-type: none">• The deletion of the last paragraph of this policy is supported as experience suggests that specifying future documents within a policy can cause problems due to potential delays or subsequent changes. The on-going work between the two Northamptonshire Joint Planning Units to support the delivery of the strategic infrastructure requirements that cross both areas is welcomed.• Consideration should be given to the role of local planning authorities in identifying additional infrastructure at the local level.
PC016/ID	Table 7	42	9	<ul style="list-style-type: none">• The proposed changes to the Table do not explain the status of the Table. In the event that it is supporting information only, then this should be made clear in the explanatory text.• Reference is made to increasing the capacity of Waste Water Treatment Works. This, and other enhanced utilities provision, is a responsibility of the statutory undertakers and should not be a planning policy requirement.

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				<ul style="list-style-type: none">Reference is made to the Infrastructure Delivery Plan being updated however there is no reference to assessing the viability of the development proposal which must be a key issue to ensure deliverability.
PC017/ID	Table 7	43	9	It still remains unclear whether Table 7, the supporting Infrastructure Delivery Plan, and the supporting text between Paragraphs 11.30–11.39 is formally part of the Joint Core Strategy or is for information in the context of Policy INF2. In the event that it is supporting information only, then this should be made clear in the explanatory text. If it is a policy requirement then it needs to be subject to the tests of soundness. Any requirements must be properly, reasonably and fairly attributed to the responsible provider including, for example, statutory undertakers.
PC018/ID	Table 7	43	12	Comments as PC017/ID.
PC019/ID	Table 7	43	9	Comments as PC017/ID.
PC020/ID	Table 7	43	12	Comments as PC017/ID.
PC021/ID	Table 7	43	9	Comments as PC017/ID.
PC022/ID	Table 7	44	10	<ul style="list-style-type: none">Comments as PC017/ID.The inclusion of the Northampton Growth Management Scheme is welcomed.
PC023/ID	Table 7	44	10	<ul style="list-style-type: none">Comments as PC017/ID.

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				<ul style="list-style-type: none">• The inclusion of the Northampton Growth Management Scheme is welcomed.
PC024/ID	Table 7	44	10	The inclusion of the Northampton Growth Management Scheme is welcomed.
PC025/ID	Table 7	44	9	Comments as PC017/ID.
PC026/ID	Table 7	45	9	Comments as PC017/ID.
PC027/ID	Table 7	45	9	Comments as PC017/ID.
PC028/ID	Table 7	45	10	<ul style="list-style-type: none">• Comments as PC017/ID.• The highway works required on the A45 Northampton - Daventry Corridor improvements (in this document re-named the Daventry Development Link) puts the development start back from 2017/18 to 2021. There is no certainty that development at the Daventry NE SUE will start then. There is an inherent uncertainty regarding this SUE given the need for adequate road funding and this needs to be resolved. Concern is that the development might not start in the plan period, i.e. by 2026, and that development might be allowed to start without full agreement on the A45 highway improvements.

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Section 11 – Infrastructure and Delivery

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PC029/ID	Table 7	45	10	<ul style="list-style-type: none">• Comments as PC017/ID.• The respondent is content with this change as it reflects its own assessment that the infrastructure is required in conjunction with growth of Daventry.• The proposed changes to Table 7 do not include any reference to the need for A43 junction improvements to support growth in South Northamptonshire. A further change to Table 7 is required to provide consistency with the amended Policy C3 as follows:<ul style="list-style-type: none">○ Infrastructure Required: A43 junction improvements in South Northamptonshire○ Reasons for Requirement: Required to enable housing and employment growth in Towcester, Silverstone and Brackley○ Broad Phasing: Phased programme commencing in 2014.

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Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC005/N	Policy N1	46	6	<ul style="list-style-type: none">• The changes are supported, in particular the emphasis on character and heritage assets, the focus on development in sustainable locations, and the recognition of further opportunities to improve the transport network.• Reference should be made to acceptance, in principle, of education use on part of the Waterside site.• The changes do not rectify the current shortfall in convenience shopping in Northampton.
PC007/N	Policy N2	47	8	<ul style="list-style-type: none">• The changes are supported, but care is required to ensure that the requirements relating to flood risk do not harm the viability of sites in the central area and put them at a competitive disadvantage.• The policy should encourage active ground floor uses such as banks and building societies in all designated retail frontages.• Although the level of floorspace provision has been justified, these figures should be flexible and the JCS should specify how they will be updated over time.

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				<ul style="list-style-type: none">• The Roger Tym and Partners Retail Capacity Update 2012 is flawed as it artificially deflates expenditure capacity, and its calculations protect internet expenditure. It also assumes that the town centre's market share will remain constant whereas new development such as the Grosvenor Centre will increase market share.• Reference should be made to acceptance, in principle, of education use on part of the Waterside site.• The changes do not address matters raised in Pre-Submission representations in relation to justification for this Policy.• For consistency the word 'town' should be deleted.• Reference to the 'sequential approach' should be included to ensure that Policy N2 is consistent with Policy S9.• Further guidance is needed on how the requirement to reduce flood risk 'where possible' will be balanced against other considerations. The approach taken should be consistent with Policies BN7 and BN7A.

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Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC011/N	Paragraph 12.28	49	0	No representations received.
PC013/N	Policy N3	49	15	<ul style="list-style-type: none">• A further change is required to include contributions towards the Northampton Growth Management Scheme.• The proposed changes are considered to be appropriate and justified.• Previous objections to the Policy have been addressed by the Proposed Changes and the Policy is now supported.• The deletion of 'park and ride' without any alternative measures will increase traffic on existing roads. It also calls into question the soundness of the plan and does not accord with the promise of infrastructure before development.• The SUE should be deleted and replaced with its current designation as a valuable green space. The SUE should then be re-allocated on land to the north of Moulton.• The changes fail to address the concerns of local landowners and Parish Councils. The prescriptive red line allocation should be removed to enable the Neighbourhood Plan to determine the location of growth.

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				<ul style="list-style-type: none">• The designation of a local centre within the SUE cannot be justified without an appraisal of local shopping within the existing urban area.• Minor specific wording changes are sought:<ul style="list-style-type: none">○ In the sixth bullet – delete the words: ‘A contribution towards’○ In the eighth bullet - reword to enable the new road to extend to the A43 north of Overstone Road.
PC017/N	Policy N4	52	5	<ul style="list-style-type: none">• A further change is required to include contributions towards the Northampton Growth Management Scheme.• Support is expressed ‘in principle’ for the policy and the Proposed Changes.• The insertion of the word ‘small’ in relation to the convenience store is potentially too restrictive.• The designation of a local centre within the SUE cannot be justified without an appraisal of local shopping within the existing urban area.• Improvements sought to the Cock Hotel Junction are not considered necessary for this development or reasonably related to it.

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				<ul style="list-style-type: none">• The Proposed Changes do not provide an effective development plan in relation to Northampton West and previously submitted representations relating to the impact on the countryside and Harlestone village are referred to.
PC020/N	Policy N5	54	44	<ul style="list-style-type: none">• A further change is required to include contributions towards the Northampton Growth Management Scheme.• Previous objections relating to traffic impact, access, flood risk, harm to the golf course, schools, public transport, pollution and potential solifluction have not been addressed and are reiterated.• Further technical evidence has been submitted in respect of flooding, flood risk, solifluction, traffic, infrastructure, pollution and safety. The evidence demonstrates that the SUE should either be put on hold pending the completion of a Neighbourhood Plan or be totally reassessed in terms of the scale and location of development proposed. Any reassessment should focus on a small number of quality houses adjoining Collingtree with any development on the Maple Farm part of the site accessed from Towcester Road only.

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				<ul style="list-style-type: none">• The soundness of the allocation is questioned having regard to the SHLAA assessment of the site which identifies environmental and flooding constraints together with constraints relating to access and highway impacts.• The WNJPU has not undertaken a robust assessment of the SUE, nor have they undertaken an unbiased evaluation of previous representations.• The proposed changes do not address original objections including the extension of the site to increase the dwelling capacity to 1400. It is argued that such an extension would provide greater flexibility to attenuate flood risk and accommodate green space, offer the potential for another access point, and provide a more logical physical boundary.• The increase in job numbers in the JCS is noted and it is argued that the extension of this site would enable additional housing to be provided in a sustainable location well placed to access new employment opportunities.

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				<ul style="list-style-type: none">• The requirement for a new primary school is not considered to be justified or reasonably related to the development.• The insertion of the word 'small' in relation to the convenience store is potentially too restrictive and requires clarification.• The designation of a local centre within the SUE cannot be justified without an appraisal of local shopping within the existing urban area.• Support for amendments to require ecological assessment and mitigation.
PC022/N	Policy N6	55	5	<ul style="list-style-type: none">• A further change is required to include contributions towards the Northampton Growth Management Scheme.• The insertion of the word 'small' in relation to the convenience store is potentially too restrictive and requires clarification.• The term 'convenience store' should be replaced with 'supermarket'.• The designation of a local centre within the SUE cannot be justified without an appraisal of local shopping within the existing urban area.

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				<ul style="list-style-type: none">• Support for amendments to require ecological assessment and mitigation.
PC024/N	Existing Paragraph 12.56 (New Paragraph 12.54)	57	1	The Proposed Change is supported.
PC026/N	Policy N7	57	6	<ul style="list-style-type: none">• A further change is required to include contributions towards the Northampton Growth Management Scheme.• Support the amendments, but there is a need to clarify that delivery of the development and infrastructure will be phased.• Minor wording changes are proposed to make it clear that the developer of the site is required to provide land and build part of the North West Bypass, plus make a financial contribution to the remainder of the road.• The designation of a local centre within the SUE cannot be justified without an appraisal of local shopping within the existing urban area.• Support for amendments to require ecological assessment and mitigation.
PC028/N	Policy N8	59	8	<ul style="list-style-type: none">• A further change is required to include contributions towards the Northampton Growth Management Scheme.

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				<ul style="list-style-type: none">• The insertion of the word ‘small’ in relation to the convenience store is potentially too restrictive and requires clarification.• The designation of a local centre within the SUE cannot be justified without an appraisal of local shopping within the existing urban area.• Object to the revised wording in respect of surface water management and flood attenuation. An independent flooding analysis is required based on risk of 1 in 50 years.• An independent Transport Assessment is required. Any partial completion of the North West Bypass will “dump” heavy traffic into existing residential areas.• The deletion of the specific requirement for a ‘420 Place’ Primary School provides a loophole to get out of commitments made in earlier consultation with residents.• Support for amendments to require ecological assessment and mitigation.

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				<ul style="list-style-type: none">• The proposed changes are unsound and not effective and the deliverability of the site should be reviewed for the following reasons:<ul style="list-style-type: none">○ The site is no longer likely to be developed as a whole because there is a separate planning permission for one-third of the site.○ The requirements relating to the North West Bypass are unclear.○ The deletion of the park and ride will undermine the achievement of modal shift.
PC033/N	Policy N9	61	4	<ul style="list-style-type: none">• A further change is required to include contributions towards the Northampton Growth Management Scheme.• The insertion of the word ‘small’ in relation to the convenience store is potentially too restrictive and requires clarification.• The designation of a local centre within the SUE cannot be justified without an appraisal of local shopping within the existing urban area.• Support for amendments to require ecological assessment and mitigation.
PC037/N	Policy N10	63	4	<ul style="list-style-type: none">• The changes are supported as a flexible approach to creating viable local centres within SUEs which should not harm existing centres.

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Section 12 – Northampton

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The revised policy is at odds with Paragraph 26 of the National Planning Policy Framework (NPPF) and the Joint Core Strategy Policy S9 as it appears to require proposals for convenience shopping in SUE local centres to have regard to the impact on existing network of provision in the surrounding area even though this existing network may be located beyond any defined centres and therefore not subject to any protection in national planning policy terms.• The designation of a local centre within the SUEs cannot be justified without an appraisal of local shopping within the existing urban area.
PC045/N	Policy N12	63	2	<ul style="list-style-type: none">• The changes are supported, particularly the inclusion of the Northampton Growth Management Scheme.

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Section 13 – Daventry

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC014/D	Policy D1	66	0	No representations received.
PC015/D	Policy D2	66	2	<ul style="list-style-type: none">• The addition of text regarding the conservation of heritage assets is welcomed. However, the change adds the word “appropriate” which could imply a weakening of the protection of the area's heritage assets and is also superfluous, as the definition of “conservation” in the National Planning Policy Framework refers to “the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance”.• The development quantum in Daventry does not create any issues for the A5/ A45 junction.
PC025/D	Policy D3	67	5	<ul style="list-style-type: none">• The imposition of a minimum target of the completion of 2,000 dwellings by 2026 is unnecessary and arbitrary. The wording of the first bullet point in Policy D3 should be amended to read: “4,000 dwellings, of which it is expected about 2,000 will be completed by 2026, subject to market forces”.• Policy D3 is neither justified nor effective. The housing delivery rate anticipated by the policy is unrealistically high and unachievable. Completions to 2026 are unlikely to exceed

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Section 13 – Daventry

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<p>1,417 dwellings. This leaves Daventry District short of at least 1,000 dwellings based on the original Policy/ allocation. It is important that this shortfall is met. The capacity of Policy D3 should be reduced to 1,500 dwellings to 2026 and land at Holly Lodge Drive should be allocated for 1,000 dwellings.</p> <ul style="list-style-type: none">• Add the following sentence to the end of Policy D3 to read: “THE PROPOSAL IS EXPECTED TO COME FORWARD WITH REGARD TO THE CONSENTED PROPOSALS AT MONKSMOOR FARM AND WHERE RELEVANT DEMONSTRATE CO-ORDINATION.”
PC027/D	Policy D3	68	1	The development quantum in Daventry does not create any issues for the A5/ A45 junction.

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Section 14 – Towcester

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC005/T	Existing Paragraphs 14.15 – 14.19 (New Paragraph 14.15)	69	3	<ul style="list-style-type: none">• A further change is proposed to Paragraph 14.21 to include reference to the A43 Tove and Abthorpe junction improvements.• Concern is expressed regarding the inconsistency in the terminology used to describe green space (Towcester Town Park) and how this is shown on Inset Map 3.• The delivery of the Town Park should not be linked in any way to the delivery of the Relief Road.• Extending the plan period to 2031 would enable the whole of the Towcester South SUE to be delivered in the plan period.
PC006/T	Policy T3	72	12	<ul style="list-style-type: none">• Minor wording change proposed to the 4th bullet point to retain the word 'essential' in respect of the A43 junction improvements.• Objection to the blanket designation of land owned by the Trustees of the Muriel Jackson-Stops Settlement as "Indicative Strategic Green Space". Bullet point 7 should be deleted and replaced with: "A new town park will be identified on the masterplan in the Area of Search shown on Inset 3".

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Section 14 – Towcester

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• Those parts of the proposed SUE comprising protected green space, that are of high amenity, and are subject to flood risk should be deleted and replaced with a broad area of 120 acres of land referred to as the Burcote SUE. This would provide alternative land for residential and local employment development.• The JCS needs to reflect the Burcote Wood Business Park and support its expansion for local employment.• Detailed representations seek the following wording changes to the criteria in Policy T3:<ul style="list-style-type: none">○ Dwelling numbers to be expressed as being ‘in the region of’○ Employment land areas should be ‘up to’○ Clarification that the town park will be delivered separately○ Clarification that a ‘site’ for one secondary school will be provided.• The supporting text should make it clear that contributions to the Strategic Road Network will be realistic and have full regard to viability.• Amendments to require ecological assessment and mitigation are supported.

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Section 15 – Brackley

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC010/B	Policy B2	75	10	<ul style="list-style-type: none">• To provide clarity on infrastructure provision the policy should include improvements to the A43 junctions at Brackley.• The policy is too restrictive in respect of the types of employment use specified and the 40% floorspace restriction for B8 uses is not justified.• The policy should enable a broader form of economic development including major retail development, subject to the appropriate impact assessment and sequential test.• The reduction in the capacity of the site to 350 dwellings is not justified. Additional land within the SUE boundary is suitable and available for development. The capacity of the site should be increased to 460 dwellings and the extent of the structural greenspace along the south-west boundary reduced.• Amendments to require ecological assessment and mitigation are supported.
PC013/B	Policy B3	76	7	<ul style="list-style-type: none">• To provide clarity on infrastructure provision the policy should include improvements to the A43 junctions at Brackley.

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Section 15 – Brackley

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The SUE should be 'revisited' in the circumstances of High Speed Rail 2.• The curtilage of the property known as 'The Glebe' should not be excluded from the SUE allocation boundary.• Amendments to require ecological assessment and mitigation are supported.

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Section 16 – Rural Areas

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC010/R	Policy R1	79	47	<ul style="list-style-type: none">• The percentage growth limits are arbitrary and not justified by empirical evidence. They are not related to objectively assessed needs, and are overly prescriptive and inflexible.• The use of the percentage growth limits will encourage a 'first come first served' approach and will not deliver sustainable development. It will also be used to restrict development without justification.• The percentage growth figures for larger villages should be reduced and increased for smaller villages so that they can be revitalised.• The growth limits specified mean that the settlement boundaries for most settlements will need to be amended, but this is not specified in the policy.• The hierarchy approach is considered to be too restrictive. Alternative approaches to the rural housing strategy should be considered including new settlements as a potential means of delivery.• The hierarchy should be developed and included as a strategic component of the JCS. The identification of Primary Service Villages is particularly important as they are key to the delivery of the rural strategy.

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Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 16 – Rural Areas

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The residual requirements identified for the rural area are considered to be inadequate, inappropriate and have not been justified by a sound methodology.• The residual figure of 1,335 dwellings for the rural area in Daventry District has not been justified.• The apparent reallocation of housing from Daventry town to the rural areas is challenged. There is no evidence to suggest that delivery in the rural areas will be easier and the increased growth will affect rural character. Particular concern is expressed about the impact on larger villages.• The proposed change to make provision for 1,790 dwellings in the rural area of South Northamptonshire is not based on an assessment of housing needs and does not take account of delays in the provision of housing at Towcester.• Using a base date of 2011 for the percentage growth limits is challenged. 2006 and 2010 are put forward as alternatives.• The addition of the policy wording in respect of ‘small settlements/ hamlets’ is an example of a ‘top down’ approach at odds with ‘local planning’.

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Section 16 – Rural Areas

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The policy is contrary to Paragraph 54 of the National Planning Policy Framework as it does not allow for the provision of market housing where this would cross-subsidise the provision of affordable housing.• Alternative wording is proposed to make it clear that the Settlements and Countryside Plans will determine both the category and the appropriate scale of development for each village/ settlement.• Environmental improvements must be essential if they are used to justify exceptions once development limits have been reached.• The final paragraph of the policy referring to existing Local Plan policies should be reinstated.• The requirement for Parish Councils to agree additional development will result in inertia due to local opposition to development proposals.• The Proposed Changes fail to acknowledge the principle that the distribution of development should achieve a balance between homes and jobs. They also fail to recognise the importance of concentrating development in those settlements, such as Silverstone, where the greatest potential exists to achieve this balance.

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Section 16 – Rural Areas

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The period covered by Policy R1 should be extended up to 2031.• The restriction of Policy R1 to the rural areas of Daventry and South Northamptonshire Districts implicitly threatens the status of Great Houghton as a discrete village in Northampton Borough.• The wording 'will only be permitted' is too negative and should be replaced with 'can be permitted'.• The policy should enable larger previously used sites to come forward for development within the rural hierarchy.• The scale of growth proposed at the Northampton North SUE in Moulton Parish is in contravention of the rural settlements hierarchy.

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Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 17 – Monitoring and Review

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC004/M	New Paragraph 17.3	84	0	No representations received.
PC011/M	Existing Paragraph 17.8 (New Paragraph 17.9)	84	0	No representations received.
PC026/M	Existing Paragraph 17.15 (New Paragraph 17.17)	85	0	No representations received.

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Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 4 – West Northamptonshire Infrastructure Delivery Plan

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/A4	Introductory (Page 201)	86	19	<ul style="list-style-type: none">• Welcome the extra clarity on infrastructure delivery and the recognition that detailed infrastructure requirements will be subject to further assessment as the form of development becomes clearer.• The proposed changes to Appendix 4 do not overcome our original concerns over uncertainty and accuracy of costs. Delete Appendix 4 or clarify its purpose, delete costings and amend inconsistencies.• As the Appendix 4 schedules are included for reference only and the IDP and the associated schedules will be updated annually the purpose of the Appendix is unclear. The introductory paragraph acknowledges that for full clarification the schedules should be read with the accompanying text in the IDP. Appendix 4 should be deleted.• It is recognised that the Infrastructure Delivery Plan (IDP) has been updated in consultation with service providers and partner authorities and that the IDP will continue to be updated in this way. One of the landowners who owns a number of the SUEs would welcome the opportunity to be engaged in discussions with the relevant authorities relating to their development sites (as these progress through the planning process) to identify the actual infrastructure requirements and potential funding sources. All such infrastructure provision considerations must take account of site specific viability considerations.

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Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 4 – West Northamptonshire Infrastructure Delivery Plan

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC002/A4	Tables (pages 202 to 222)	91	11	<ul style="list-style-type: none">• Reference is made to the Daventry to Northampton A45 Corridor Study which was due to be completed in March 2011. The respondent states that they have not seen a detailed report on this matter except to note that the development timetable has slipped to 2021. Clarity is sought on how much development will be allowed at Daventry North East SUE prior to 2021 if indeed any. The Core Strategy needs to address this fundamental issue as it is quite clear that further development land might need to be identified in Daventry District within the rural area to fulfil basic plan requirements to 2026 – as such the plan as drafted remains unsound on the Daventry North East SUE. Until this aspect is ratified the plan remains unsound.• The Proposed Changes to Appendix 4 adequately refers to the Strategic Road Network infrastructure required to support the plan.• Appendix 4 should be amended to include an additional infrastructure requirement with regard to proposed growth in South Northamptonshire as follows:<ul style="list-style-type: none">○ Infrastructure Requirement: Improvements to A43 junctions at Brackley○ Required for Growth at: Brackley and Silverstone○ Delivery Body: HA/ Developer○ Broad Phasing: 2015○ Cost Est.: £1.5m

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Table 1 - Summary of the Main Issues Raised by the Representations to the Significant Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 4 – West Northamptonshire Infrastructure Delivery Plan

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">○ Funding Sources: Developer● The updated IDP provides greater synergy between the framework for the Joint Core Strategy and the Central Area Action Plan, as officers have sought to co-ordinate the monitoring framework.● Object to the infrastructure requirements associated with the Northampton South Sustainable Urban Extension, principally E5 and T25, which have not been justified.● Concerns remain regarding a number of infrastructure items in the Schedule that relate to the Daventry North East SUE. The SUE promoters support the emerging Core Strategy Local Plan and will seek to work with the Joint Planning Unit to resolve these matters through a Statement of Common Ground prior to the Public Examination.● Clarification is required that the Schedule is an iterative document which will be revised and up-dated as necessary, as more detailed technical information, timings and financial contribution information and proportionality assessments become available.● It should be made clear that provision of a secondary school is not a requirement arising entirely from Northampton King's Heath SUE, but is a requirement to meet needs also arising from the development of

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Section 18/ Appendix 4 – West Northamptonshire Infrastructure Delivery Plan

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<p>other sites.</p> <ul style="list-style-type: none">• In relation to Towcester South SUE:<ul style="list-style-type: none">○ Highway funding has been proposed to be a combination of developer, Highways Agency and Northamptonshire County Council funding. The Proposed Changes show developer only funding. This is not feasible. There will need to be funding from both public and private sectors for the improvements and therefore developers, Highways Agency and Northamptonshire County Council should be identified.○ The secondary schooling required by the development of Towcester South SUE is significantly less than 6 form entry but the County Council wish to have the option to build a 6 form entry, or larger.○ It is noted that the Towcester town park has a tertiary status, it is established that this is aspirational and it is not necessary for the main scheme developer to provide this.

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Section 18/ Appendix 6 – West Northamptonshire Monitoring Framework

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/A6	Objective 1 – Table Layout	115	1	The extra emphasis and clarity on monitoring provided through the Proposed Changes is welcomed.
PC002/A6	Objective 1 – Table Layout	115	0	No representations received.
PC003/A6	Objective 1 – Table Layout	115	0	No representations received.
PC004/A6	Objective 1 – Indicator 1	116	6	<ul style="list-style-type: none">• The indicator should enable a more flexible approach to be applied that is able to recognise any abnormal infrastructure, facility and mitigation costs that can place limitations on sustainability initiatives in SUE locations in particular, e.g. Towcester South SUE. <p>Plans need to be realistic, and should ensure that the impact of the policies when read as whole should be such that the plan is deliverable. Plans should have regard to the Local Housing Delivery Group's advice for planning practitioners on Viability Testing in Local Plans (June 2012) and the NPPF. Development should not be subject to such a scale of obligations, standards and policy burdens that cumulatively this threatens the plan's viability.</p>
PC005/A6	Objective 1 – Indicator 1	116	0	No representations received.
PC006/A6	Objective 1 – Indicator 1	117	0	No representations received.
PC007/A6	Objective 1 – Indicator 1	117	0	No representations received.
PC008/A6	Objective 1 – Indicator 2	117	0	No representations received.
PC009/A6	Objective 1 – Indicator 2	117	0	No representations received.

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Section 18/ Appendix 6 – West Northamptonshire Monitoring Framework

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC010/A6	Objective 1 – Indicator 2	118	0	No representations received.
PC011/A6	Objective 1 – Indicator 2	118	0	No representations received.
PC012/A6	Objective 1 – Indicator 3	118	0	No representations received.
PC013/A6	Objective 1 – Indicator 3	118	0	No representations received.
PC014/A6	Objective 1 – Indicator 3	119	0	No representations received.
PC015/A6	Objective 1 – Indicator 3	119	0	No representations received.
PC016/A6	Objective 1 – Indicator 3	119	0	No representations received.
PC017/A6	Objective 1 – Indicator 4	120	0	No representations received.
PC018/A6	Objective 1 – Indicator 4	120	0	No representations received.
PC019/A6	Objective 1 – Indicator 4	120	0	No representations received.
PC020/A6	Objective 1 – Indicator 4	120	0	No representations received.
PC021/A6	Objective 1 – Indicator 4	120	0	No representations received.
PC022/A6	Objective 1 – Indicator 5	121	0	No representations received.
PC023/A6	Objective 1 – Indicator 5	121	0	No representations received.
PC024/A6	Objective 1 – Indicator 5	121	0	No representations received.
PC025/A6	Objective 1 – Indicator 5	121	0	No representations received.
PC026/A6	Objective 1 – Indicator 5	122	0	No representations received.
PC027/A6	Objective 1 – Indicator 6	122	0	No representations received.
PC028/A6	Objective 1 – Indicator 6	122	0	No representations received.
PC029/A6	Objective 1 – Indicator 6	122	0	No representations received.
PC030/A6	Objective 1 – Indicator 6	122	0	No representations received.
PC031/A6	Objective 2 – Indicator 1	123	0	No representations received.
PC032/A6	Objective 2 – Indicator 1	123	0	No representations received.
PC033/A6	Objective 2 – Indicator 1	123	0	No representations received.
PC034/A6	Objective 2 – Indicator 1	123	0	No representations received.
PC035/A6	Objective 2 – Indicator 1	124	0	No representations received.

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Section 18/ Appendix 6 – West Northamptonshire Monitoring Framework

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC036/A6	Objective 2 – Indicator 2	124	0	No representations received.
PC037/A6	Objective 2 – Indicator 2	124	0	No representations received.
PC038/A6	Objective 2 – Indicator 2	124	0	No representations received.
PC039/A6	Objective 2 – Indicator 2	125	0	No representations received.
PC040/A6	Objective 3 – Indicator 1	125	0	No representations received.
PC041/A6	Objective 3 – Indicator 2	126	0	No representations received.
PC042/A6	Objective 3 – Indicator 2	126	0	No representations received.
PC043/A6	Objective 3 – Indicator 2	126	0	No representations received.
PC044/A6	Objective 3 – Indicator 2	126	0	No representations received.
PC045/A6	Objective 3 – Indicator 2	127	0	No representations received.
PC046/A6	Objective 4 – Indicator 1	127	0	No representations received.
PC047/A6	Objective 4 – Indicator 1	127	0	No representations received.
PC048/A6	Objective 4 – Indicator 1	127	0	No representations received.
PC049/A6	Objective 4 – Indicator 2	128	0	No representations received.
PC050/A6	Objective 4 – Indicator 2	128	0	No representations received.
PC051/A6	Objective 4 – Indicator 2	128	0	No representations received.
PC052/A6	Objective 4 – Indicator 2	128	0	No representations received.
PC053/A6	Objective 5 – Indicator 1	129	0	No representations received.
PC054/A6	Objective 5 – Indicator 1	129	0	No representations received.
PC055/A6	Objective 5 – Indicator 1	129	0	No representations received.
PC056/A6	Objective 5 – Indicator 2	129	0	No representations received.
PC057/A6	Objective 5 – Indicator 2	129	0	No representations received.
PC058/A6	Objective 5 – Indicator 2	130	0	No representations received.
PC059/A6	Objective 5 – Indicator 2	130	0	No representations received.
PC060/A6	Objective 6 – Indicator 1	130	0	No representations received.
PC061/A6	Objective 6 – Indicator 1	130	0	No representations received.

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Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC062/A6	Objective 6 – Indicator 1	130	0	No representations received.
PC063/A6	Objective 6 – Indicator 1	131	0	No representations received.
PC064/A6	Objective 6 – Indicator 2	131	0	No representations received.
PC065/A6	Objective 6 – Indicator 2	131	0	No representations received.
PC066/A6	Objective 6 – Indicator 2	131	0	No representations received.
PC067/A6	Objective 6 – Indicator 2	131	0	No representations received.
PC068/A6	Objective 7 – Indicator 1	132	0	No representations received.
PC069/A6	Objective 7 – Indicator 1	132	0	No representations received.
PC070/A6	Objective 7 – Indicator 1	132	0	No representations received.
PC071/A6	Objective 7 – Indicator 1	132	0	No representations received.
PC072/A6	Objective 7 – Indicator 1	133	0	No representations received.
PC073/A6	Objective 7 – Indicator 2	133	0	No representations received.
PC074/A6	Objective 7 – Indicator 2	133	0	No representations received.
PC075/A6	Objective 7 – Indicator 2	134	0	No representations received.
PC076/A6	Objective 7 – Indicator 2	134	0	No representations received.
PC077/A6	Objective 7 – Indicator 2	134	0	No representations received.
PC078/A6	Objective 8 – Indicator 1	134	0	No representations received.
PC079/A6	Objective 8 – Indicator 1	135	0	No representations received.
PC080/A6	Objective 8 – Indicator 1	135	0	No representations received.
PC081/A6	Objective 8 – Indicator 1	135	0	No representations received.
PC082/A6	Objective 8 – Indicator 2	136	0	No representations received.
PC083/A6	Objective 8 – Indicator 2	136	0	No representations received.
PC084/A6	Objective 8 – Indicator 2	136	0	No representations received.
PC085/A6	Objective 8 – Indicator 2	136	0	No representations received.
PC086/A6	Objective 8 – Indicator 3	137	1	The increase in jobs is welcomed.
PC087/A6	Objective 8 – Indicator 3	137	0	No representations received.

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Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC088/A6	Objective 8 – Indicator 3	137	0	No representations received.
PC089/A6	Objective 8 – Indicator 3	137	0	No representations received.
PC090/A6	Objective 8 – Indicator 4	138	0	No representations received.
PC091/A6	Objective 8 – Indicator 4	138	0	No representations received.
PC092/A6	Objective 8 – Indicator 4	138	0	No representations received.
PC093/A6	Objective 8 – Indicator 4	138	0	No representations received.
PC094/A6	Objective 8 – Indicator 5	139	0	No representations received.
PC095/A6	Objective 8 – Indicator 5	139	0	No representations received.
PC096/A6	Objective 8 – Indicator 5	139	0	No representations received.
PC097/A6	Objective 9 – Indicator 1	139	0	No representations received.
PC098/A6	Objective 9 – Indicator 1	140	0	No representations received.
PC099/A6	Objective 9 – Indicator 1	140	0	No representations received.
PC100/A6	Objective 9 – Indicator 1	140	0	No representations received.
PC101/A6	Objective 9 – Indicator 1	140	0	No representations received.
PC102/A6	Objective 9 – Indicator 2	141	0	No representations received.
PC103/A6	Objective 9 – Indicator 2	141	0	No representations received.
PC104/A6	Objective 9 – Indicator 2	141	0	No representations received.
PC105/A6	Objective 9 – Indicator 2	141	0	No representations received.
PC106/A6	Objective 9 – Indicator 1	141	0	No representations received.
PC107/A6	Objective 10 – Indicator 1	142	0	No representations received.
PC108/A6	Objective 10 – Indicator 1	142	0	No representations received.
PC109/A6	Objective 10 – Indicator 1	142	0	No representations received.
PC110/A6	Objective 10 – Indicator 1	142	0	No representations received.
PC111/A6	Objective 10 – Indicator 2	142	0	No representations received.
PC112/A6	Objective 10 – Indicator 2	143	0	No representations received.
PC113/A6	Objective 10 – Indicator 2	143	0	No representations received.

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Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC114/A6	Objective 10 – Indicator 2	143	0	No representations received.
PC115/A6	Objective 11 – Indicator 1	143	0	No representations received.
PC116/A6	Objective 11 – Indicator 1	144	0	No representations received.
PC117/A6	Objective 11 – Indicator 1	144	0	No representations received.
PC118/A6	Objective 11 – Indicator 1	144	0	No representations received.
PC119/A6	Objective 11 – Indicator 2	144	0	No representations received.
PC120/A6	Objective 11 – Indicator 2	145	0	No representations received.
PC121/A6	Objective 11 – Indicator 2	145	0	No representations received.
PC122/A6	Objective 11 – Indicator 2	145	0	No representations received.
PC123/A6	Objective 11 – Indicator 3	145	0	No representations received.
PC124/A6	Objective 11 – Indicator 3	146	0	No representations received.
PC125/A6	Objective 11 – Indicator 3	146	0	No representations received.
PC126/A6	Objective 11 – Indicator 3	146	0	No representations received.
PC127/A6	Objective 11 – Indicator 3	146	0	No representations received.
PC128/A6	Objective 11 – Indicator 4	147	0	No representations received.
PC129/A6	Objective 11 – Indicator 4	147	0	No representations received.
PC130/A6	Objective 11 – Indicator 4	147	0	No representations received.
PC131/A6	Objective 11 – Indicator 4	147	0	No representations received.
PC132/A6	Objective 11 – Indicator 5	147	0	No representations received.
PC133/A6	Objective 11 – Indicator 5	148	0	No representations received.
PC134/A6	Objective 11 – Indicator 5	148	0	No representations received.
PC135/A6	Objective 11 – Indicator 5	148	0	No representations received.
PC136/A6	Objective 11 – Indicator 6	148	0	No representations received.
PC137/A6	Objective 11 – Indicator 6	148	0	No representations received.
PC138/A6	Objective 11 – Indicator 6	149	0	No representations received.
PC139/A6	Objective 11 – Indicator 6	149	0	No representations received.

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Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC140/A6	Objective 11 – Indicator 6	149	0	No representations received.
PC141/A6	Objective 12 – Indicator 1	150	0	No representations received.
PC142/A6	Objective 12 – Indicator 1	150	0	No representations received.
PC143/A6	Objective 12 – Indicator 1	150	0	No representations received.
PC144/A6	Objective 12 – Indicator 1	150	0	No representations received.
PC145/A6	Objective 12 – Indicator 2	150	0	No representations received.
PC146/A6	Objective 12 – Indicator 2	151	0	No representations received.
PC147/A6	Objective 12 – Indicator 2	151	0	No representations received.
PC148/A6	Objective 13 – Indicator 1	151	0	No representations received.
PC149/A6	Objective 13 – Indicator 1	151	0	No representations received.
PC150/A6	Objective 13 – Indicator 1	151	0	No representations received.
PC151/A6	Objective 14 – Indicator 1	152	1	General support for the amendments to Objective 14 of the Monitoring Framework.
PC152/A6	Objective 14 – Indicator 1	152	0	No representations received.
PC153/A6	Objective 14 – Indicator 1	152	0	No representations received.
PC154/A6	Objective 14 – Indicator 1	152	0	No representations received.
PC155/A6	Objective 14 – Indicator 1	152	0	No representations received.
PC156/A6	Objective 14 – Indicator 2	153	0	No representations received.
PC157/A6	Objective 14 – Indicator 2	153	0	No representations received.
PC158/A6	Objective 14 – Indicator 2	153	0	No representations received.
PC159/A6	Objective 14 – Indicator 2	153	0	No representations received.
PC160/A6	Objective 14 – Indicator 2	154	0	No representations received.
PC161/A6	Objective 14 – Indicator 3	154	0	No representations received.
PC162/A6	Objective 14 – Indicator 3	154	0	No representations received.
PC163/A6	Objective 14 – Indicator 3	154	0	No representations received.
PC164/A6	Objective 14 – Indicator 4	154	0	No representations received.

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Section 18/ Appendix 6 – West Northamptonshire Monitoring Framework

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC165/A6	Objective 14 – Indicator 4	155	0	No representations received.
PC166/A6	Objective 14 – Indicator 4	155	0	No representations received.
PC167/A6	Objective 15 – Indicator 1	155	0	No representations received.
PC168/A6	Objective 15 – Original Indicator 1	155	0	No representations received.
PC169/A6	Objective 15 – Original Indicator 2	156	0	No representations received.
PC170/A6	Objective 15 – New Indicator 1	157	1	The commitment to high quality design and the suggested methods for monitoring compliance in the future included as part of the Proposed Changes is welcomed.
PC171/A6	Objective 15 – New Indicator 1	157	0	No representations received.
PC172/A6	Objective 15 – New Indicator 1	158	0	No representations received.
PC173/A6	Objective 15 – New Indicator 1	158	0	No representations received.
PC174/A6	New Objective 16	158	0	No representations received.
PC175/A6	Objective 16 – Indicator 1	159	1	The new objective and indicator is welcomed. It is suggested that reference is made to acknowledge the role of 'local communities and representative organisations', including Conservation Area Advisory Committees, as part of the 5 yearly reviews.
PC176/A6	Objective 16 – Indicator 1	159	0	No representations received.
PC177/A6	Objective 16 – Indicator 1	160	0	No representations received.
PC178/A6	Objective 16 – Indicator 1	160	0	No representations received.
PC179/A6	Objective 16 – Indicator 2	160	0	No representations received.
PC180/A6	Objective 16 – Indicator 2	161	0	No representations received.
PC181/A6	Objective 16 – Indicator 2	161	0	No representations received.
PC182/A6	Objective 16 – Indicator 2	162	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section - Foreword

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/F	Section Heading	4	7	<ul style="list-style-type: none">• A number of representations offer general support for the Proposed Changes.• Particular support is expressed for the greater flexibility to respond to local needs, the greater emphasis on protecting heritage, the focus on cross-boundary issues, the extensive work on infrastructure delivery, and the inclusion of Church Fields, Daventry as a Strategic Urban Extension.
PC002/F	First Paragraph	4	0	No representations received.
PC003/F	Second Paragraph	4	0	No representations received.
PC004/F	Second Paragraph	4	0	No representations received.
PC005/F	Second Paragraph	4	0	No representations received.
PC006/F	Third Paragraph	4	0	No representations received.
PC007/F	Fourth Paragraph	4	0	No representations received.
PC008/F	Fourth Paragraph	4	0	No representations received.
PC009/F	Sixth Paragraph	4	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 1 – The Representations Arrangements

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/R	The Whole Section	5	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 3 – Introduction

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/I	Paragraph 3.8	6	12	<ul style="list-style-type: none">• The changes proposed are supported.• It is argued that the JCS does not accord with the NPPF because the approach to economic development does not represent an objective assessment of need nor does it meet the requirement to achieve each of the economic, social and environmental dimensions of sustainable development.• The interaction between the JCS area and Milton Keynes is a key relationship in housing and economic terms, but there is no reference to joint working on these matters.• The JCS states that it complies with National Policy but this does not appear to have been demonstrated or tested throughout the Core Strategy.• The Pre-Submission JCS was published prior to new tests of soundness in the NPPF, therefore it is fundamentally flawed to only consult on changes to the document, rather than the whole document. A new consultation exercise should therefore be undertaken on the entirety of the JCS, so that neighbourhoods, local organisations and businesses can consider whether the JCS, as prepared in its entirety, is considered to be sound.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 3 – Introduction

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The Proposed Change made at PC001/I demonstrates that full regard has not been paid to the NPPF and that the Proposed Changes made throughout the JCS are not fully consistent with these policy provisions.• A new Strategic Housing Market Assessment (SHMA) is needed to comply with the NPPF requirement to assess the full development needs of the area.• The JCS, as currently drafted with the Proposed Changes, goes beyond a high level strategy (new para 3.13) and seeks to provide more detailed development management policies which are better suited to subsequent LDF documents (para 3.9) and/or to the development control process, therefore regard the JCS as unsound and aspects to be unlawful.• As the East Midlands RSS has not yet been formally revoked, the JCS is not consistent with national policy and is therefore unsound.• The 'new' evidence base which has been prepared to support the changes does not accord with the RSS and its efficacy is questioned.• The JCS has not been positively prepared.

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Section 3 – Introduction

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC002/I	Paragraph 3.9	6	1	The clarification of the reasons will help to explain the need for the changes for new Councillors.
PC004/I	Existing Paragraph 3.13 (New Paragraph 3.14)	7	1	The change makes the proposal clearer to those who have not dealt with planning before.
PC005/I	Existing Paragraph 3.15 (New Paragraph 3.16)	7	0	No representations received.
PC006/I	Existing Para 3.17 (New Para 3.18)	7	0	No representations received.

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Section 4 – Spatial Portrait, Vision and Objectives

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/S	Paragraph 4.13	10	0	No representations received.
PC002/S	Paragraph 4.33	10	0	No representations received.
PC003/S	Paragraph 4.36	10	0	No representations received.
PC004/S	Paragraph 4.51	10	0	No representations received.
PC005/S	Paragraph 4.53	10	0	No representations received.
PC007/S	Paragraph 4.62	10	0	No representations received.
PC008/S	Paragraph 4.63	10	0	No representations received.
PC009/S	Objective 10	10	0	No representations received.
PC010/S	Paragraph 4.64	11	0	No representations received.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/SS	Paragraph 5.4	12	0	No representations received.
PC002/SS	Paragraph 5.7	12	0	No representations received.
PC003/SS	Paragraph 5.14	12	0	No representations received.
PC004/SS	Policy S1	12	3	The proposed changes fail to acknowledge the principle that the distribution of development should achieve a balance between homes and jobs. They also fail to recognise the importance of concentrating development in those settlements, such as Silverstone, where the greatest potential exists to achieve this balance.
PC005/SS	Paragraph 5.15	13	0	No representations received.
PC006/SS	Paragraph 5.16	13	0	No representations received.
PC007/SS	Paragraph 5.18	13	0	No representations received.
PC008/SS	Paragraph 5.20	14	0	No representations received.
PC009/SS	Policy S2	14	1	<ul style="list-style-type: none">• The designation of local centres within the SUEs cannot be justified without an appraisal of local shopping within the existing urban area.• The reference to local centres within the SUEs should be deleted from the policy.
PC010/SS	Policy S2	14	1	Replacement of the word 'should' with 'must' removes necessary flexibility from the policy, thereby reducing its effectiveness and bringing the policy into direct conflict with the National Planning Policy Framework (NPPF) and its focus on 'delivery' of economic growth and development. It implies a negative, rather than positive approach to development and is inconsistent with changes made to Policy S9 (PC058/SS) which recognise this and introduces the word 'should'.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC011/SS	Paragraph 5.21	15	0	No representations received.
PC012/SS	Paragraph 5.21	15	5	<ul style="list-style-type: none">• The validity of the consultation exercise is challenged and it is argued that the Joint Core Strategy as a whole should be subject to representations in the light of the National Planning Policy Framework (NPPF), in particular the new test of soundness which requires the plan to be ‘positively prepared’.• The plan has failed to be positively prepared to meet the housing needs of South Northamptonshire District.• An additional 1,000 dwellings needs to be allocated in South Northamptonshire to provide a 20% buffer.• Furthermore the housing requirement does not meet ‘full objectively assessed housing needs’ and is therefore not consistent with the NPPF.• The Brackley North SUE should be extended to provide c680 dwellings.• The provisions for the Northampton Related Development Area (NRDA) ought to include an allowance for contingency in the event that additional or alternative growth is needed. It is considered that land at West Northampton is suitable for this purpose.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC013/SS	Paragraph 5.22	15	4	<ul style="list-style-type: none">• The provisions for the Northampton Related Development Area (NRDA) ought to include an allowance for contingency in the event that additional or alternative growth is needed. Land at West Northampton is suitable for this purpose.• The plan period should be extended to cover at least 15 years from adoption in line with the National Planning Policy Framework (NPPF).
PC014/SS	Table 1	15	10	<ul style="list-style-type: none">• Objection is raised to the overall quantum of housing and reference is raised to separate representations on Policy S3.• The time period of the plan specified in Table 1 should be changed to 2011-2031.
PC015/SS	Paragraph 5.23	15	1	<ul style="list-style-type: none">• The provisions for the Northampton Related Development Area (NRDA) ought to include an allowance for contingency in the event that additional or alternative growth is needed. Land at West Northampton is suitable for this purpose.
PC016/SS	Paragraph 5.24	16	0	No representations received.
PC017/SS	Paragraph 5.26	16	0	No representations received.
PC018/SS	Policy S3	17	39	<ul style="list-style-type: none">• How the split between Daventry town and Daventry rural has been determined is questioned.• The increase in housing provision for Daventry rural is welcome, but the figure is still too low. More development should be targeted to larger, sustainable

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<p>villages such as Long Buckby.</p> <ul style="list-style-type: none">• The additional housing requirement for Daventry rural is not justified and is not considered to be a ‘minor’ change.• The changes have not addressed previous representations concerning housing targets and conformity with the Regional Spatial Strategy (RSS)• The changes to Policy S3 still lack clarity in their justification for a lower housing requirement than the RSS.• The housing supply figures should be amended to accord with the RSS.• A target of 2,500 dwellings per annum is required to ensure that the plan is positively prepared and meets objectively assessed needs.• The plan is not positively prepared as it fails to meet objectively assessed development and infrastructure needs. For example, the housing trajectory now proposes even lower building targets in the next few years.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• As the housing provision figure fails to provide a 20% buffer it is in conflict with the NPPF. The shortfall in provision since 2001 should be added to the plan requirement and the trajectory amended to accord with the NPPF.• The justification for the deletion of the Northampton South East SUE is challenged.
PC019/SS	Policy S4	17	5	<ul style="list-style-type: none">• Policy S4 as presently worded would prevent further development beyond the Northampton Related Development Area (NRDA). This element should be deleted to enable further development if the anticipated level of completions do not materialise.• There is the need to have a specific policy to maintain a buffer of surrounding countryside between Kislingbury and Northampton.• The time period of the plan set out in Policy S4 should be changed to 2011-2031.
PC021/SS	Paragraph 5.31	17	7	<ul style="list-style-type: none">• Concern is expressed that the plan relies heavily on target based policies and the viability testing of individual schemes. Wording should be inserted which refers to a supportive policy framework and the cumulative impact of policies in the plan.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">The inclusion of a 'Delivery and Contingency' section is welcome, but concern is expressed that the wording of Policy S5 in respect of employment provision is not capable of being effectively monitored.
PC023/SS	Existing Paragraph 5.32 (New Paragraph 5.38)	18	0	No representations received.
PC024/SS	Existing Paragraph 5.34 (New Paragraph 5.40)	18	0	No representations received.
PC025/SS	Existing Paragraph 5.35 (New Paragraph 5.41)	18	0	No representations received.
PC026/SS	Existing Paragraph 5.35 (New Paragraph 5.41)	19	2	Object to the jobs provision figure of 19,000. The Joint Core Strategy (JCS) fails to meet the clear policy direction provided by the National Planning Policy Framework and is not consistent with national policy. The JCS does not acknowledge the trend growth in warehouse and distribution employment will continue in the future. Warehousing and distribution provides high levels of inward investment into West Northamptonshire and its role in the local economy should be recognised.
PC027/SS	Existing Paragraph 5.35 (New Paragraph 5.41)	19	0	No representations received.
PC028/SS	Existing Paragraph 5.35 (New Paragraph 5.41)	19	4	<ul style="list-style-type: none">The Joint Core Strategy does not acknowledge that the trend of growth in warehouse and distribution employment will continue in the foreseeable future.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• Change conveys commitment to make good job losses in the local economy with a corresponding increase in the 19,000 new jobs total. Notwithstanding objection to the 19,000 figure, the principle of this approach is supported.• Welcomes increase in jobs across the region• This is not a widely based job led strategy.
PC029/SS	Existing Paragraph 5.36 (New Paragraph 5.42)	19	0	No representations received.
PC030/SS	Existing Paragraph 5.37 (New Paragraph 5.43)	19	0	No representations received.
PC032/SS	Existing Paragraph 5.39 (New Paragraph 5.45)	19	0	No representations received.
PC033/SS	Existing Paragraph 5.40 (New Paragraph 5.46)	20	0	No representations received.
PC034/SS	Existing Paragraph 5.40 (New Paragraph 5.46)	20	0	No representations received.
PC035/SS	Existing Paragraph 5.41 (New Paragraph 5.47)	20	1	This is not a widely based job led strategy.
PC036/SS	Existing Paragraph 5.42 (New Paragraph 5.42)	20	0	No representations received.
PC037/SS	Existing Paragraph 5.43 (New Paragraph 5.49)	21	0	No representations received.
PC038/SS	Existing Paragraph 5.44 (New Paragraph 5.50)	21	0	No representations received.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC040/SS	Existing Paragraph 5.45 (New Paragraph 5.51)	21	0	No representations received.
PC041/SS	Existing Paragraph 5.45 (New Paragraph 5.51)	22	0	No representations received.
PC042/SS	Existing Paragraph 5.46 (New Paragraph 5.52)	22	0	No representations received.
PC043/SS	Existing Paragraph 5.47 (New Paragraph 5.53)	22	1	This is not a widely based job led strategy.
PC044/SS	Existing Paragraph 5.48 (New Paragraph 5.54)	23	0	No representations received.
PC045/SS	Existing Paragraph 5.49 (New Paragraph 5.55)	23	4	<ul style="list-style-type: none">• The Proposed Change fails to take the opportunity to provide for additional land to be developed at Junction 18 of the M1 to consolidate non-strategic employment opportunities in the locality for the B1 (a) and (b), B2 and B8 uses.• Amend the second sentence as proposed with the addition of the following at the end: "...of employment land (or unless agreed through the preparation of detailed Local Plans by the individual Councils)". This change would improve the effectiveness of the Joint Core Strategy by confirming that non-strategic allocations may still come forward through Local Plans being prepared by the individual Councils and help include additional flexibility to enable response to market demand.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• Additional land at Brackmills Point should be allocated for employment development within the JCS.• Through activity within the West Northamptonshire market area the respondent is aware that availability of land for warehousing and distribution uses remains limited.• The 'large supply of warehouse development with planning consent in the pipeline' has been taken up. Daventry International Rail Freight Terminal (DIRFT) II is likely to be exhausted by 2014.• Support the proposed Policy E4 relating to DIRFT and the identification of DIRFT as being a warehousing and distribution centre of national significance (Paragraph 4.50 of the Joint Core Strategy).• Add further robustness to the Joint Core Strategy with minor amendments e.g. removing reference to not meeting trend growth, "large" from supply of warehouse development, and 'any' from accommodating new warehousing.
PC046/SS	Existing Paragraph 5.51 (New Paragraph 5.57)	23	1	The JCS should build headroom into its employment land allocations with specific sites being identified in key job growth sector locations, including at Arm Farm in South Northamptonshire.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC047/SS	Existing Paragraph 5.53 (New Paragraph 5.59)	24	0	No representations received.
PC048/SS	Existing Paragraph 5.56 (New Paragraph 5.62)	24	1	<ul style="list-style-type: none">• Paragraph 5.56 fails to recognise that there are a number of issues that have affected the town centre vitality – including the inability to promote a deliverable town centre extension scheme (thereby reducing its attractiveness); the enhancement of the retail offer in neighbouring towns such as Milton Keynes that have drawn significant levels of trade from Northamptonshire; and issues of congestion and parking charges that make a journey to the town centre unattractive. All these issues need to be recognised if the vitality and viability of the town centre is to be enhanced. Out of centre retailing has a role to play.• The third sentence in the paragraph should be deleted or revised to recognise all the factors that have adversely affected the vitality and viability of the town centre.
PC049/SS	Existing Paragraph 5.57 (New Paragraph 5.63)	24	0	No representations received.
PC050/SS	Paragraphs 5.58 and 5.59	25	0	No representations received.
PC051/SS	Existing Paragraph 5.60 (New Paragraph 5.64)	26	0	No representations received.
PC052/SS	Existing Paragraph 5.61 (New Paragraph 5.65)	26	0	No representations received.

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Section 5 – Spatial Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC053/SS	Existing Paragraph 5.63 (New Paragraph 5.67)	26	0	No representations received.
PC058/SS	Policy S9	26	1	Policy S9 provides a justifiable approach to accommodating retail development, which accords with the guidance set out in the NPPF, and is in agreement with its methodology.
PC059/SS	Existing Paragraph 5.70 (New Paragraph 5.74)	27	0	No representations received.
PC060/SS	Existing Paragraph 5.72 (New Paragraph 5.76)	28	0	No representations received.
PC061/SS	Existing Paragraph 5.73 (New Paragraph 5.77)	28	0	No representations received.
PC062/SS	Existing Paragraph 5.74 (New Paragraph 5.78)	29	0	No representations received.
PC063/SS	Existing Paragraph 5.75 (New Paragraph 5.79)	29	0	No representations received.
PC064/SS	Existing Paragraph 5.76 (New Paragraph 5.80)	30	0	No representations received.
PC065/SS	Existing Paragraph 5.77 (New Paragraph 5.81)	31	0	No representations received.
PC066/SS	Existing Paragraph 5.79 (New Paragraph 5.83)	31	0	No representations received.
PC068/SS	New Paragraph 5.84	32	0	No representations received.
PC069/SS	Existing Paragraph 5.80 (New Paragraph 5.85)	32	0	No representations received.

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Section 6 – Connections

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/C	Paragraph 6.10	36	0	No representations received.
PC002/C	Paragraph 6.10	36	0	No representations received.
PC003/C	New Paragraph 6.15	36	0	No representations received.
PC004/C	Policy C1	37	2	<ul style="list-style-type: none">• The amended objectives of Policy C1 are noted and that priority will be given to proposed transport schemes that will contribute to behavioural change.• Concerned how communication networks will be improved by the JCS and question how this will be implemented. Support the principle but would object to this becoming an additional burden on development.• Towcester Sustainable Urban Extension will help foster behavioural change but the bypass connecting two trunk roads and improvements to the A43 (T) is part of the project which is designed to improve the Strategic Road Network is first and foremost a scheme which is intended to improve facilities for motorists so that they will be encouraged to bypass Towcester, and assist in remedying air quality issues in the Town Centre. This will also support Proposed Change PC005/C. However, it is not clear how any capacity improvement can also reduce transport energy use.
PC005/C	Policy C1	37	0	No representations received.
PC006/C	Policy C1	37	0	No representations received.

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Section 6 – Connections

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC007/C	Existing Paragraph 6.15 (New Paragraph 6.16)	38	4	<ul style="list-style-type: none">• The new paragraph should make reference to viability, this is a key issue. Plans may be aspirational but they need to be realistic, and should ensure that the impact of the policies when read as whole should be such that the plan is deliverable.• The proposed changes to Paragraph 6.16 should refer to viability being a key factor in the consideration of development proposals.
PC008/C	Existing Paragraph 6.17 (New Paragraph 6.18)	38	0	No representations received.
PC009/C	Policy C2	39	13	<ul style="list-style-type: none">• The requirement in Policy C2 for Sustainable Urban Extensions to ensure that new or enhanced public transport services are secured on occupation of the first dwelling is unreasonable and unjustified. The statement has no regard to the level of existing services which may already be available. Service providers will require a critical mass before new services can be provided. The Proposed Change to add “where this is appropriate” fails to address this concern. The words “on occupation of the first dwelling” should be deleted from Policy C2.• The proposed minor changes do not respond to or coincide with the tests established at paragraph 32 of the NPPF which states that development should only be prevented on transport grounds where the "residual cumulative impacts of development are

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Section 6 – Connections

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<p>severe." Whilst PC009/C refers to enhanced public transport services "when this is appropriate", there is potential for an inflexible interpretation of this approach, delaying or preventing the delivery of new homes. Securing public transport services on the occupation of the first dwelling may be neither viable nor necessary.</p> <ul style="list-style-type: none">• Need to ensure Policy C2 is interpreted in a flexible manner, able to support delivery. The policy should refer to the issue of severe residual cumulative impacts (paragraph 32 of the NPPF). Furthermore, the JCS should take a positive view with regard to viability considerations. Thus, public transport services will be secured at a point in the programme of implementation where it will not become an additional burden on the delivery of the overall scheme.• It is noted that the Proposed Change to the second bullet point of Policy C2 which relates to SUE's will be required to "ensure that new or enhanced public transport services are secured on occupation of the first dwelling". Whilst it is recognised that this is combined with the additional words "when this is appropriate" this will not be justified at any SUE. It will not be effective and warranted to provide new services from the first occupation and the respondent

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Section 6 – Connections

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<p>objects. It is important to recognise that service providers will require a critical mass before significant new services can be provided and development will need to have regard to the level of existing services which may already be available and their potential adequacy. Policy C2 needs to call for a timetable to be agreed for the provision of new or enhanced public transport services.</p>
PC010/C	Policy C2	40	8	<ul style="list-style-type: none">• Introducing reference to development being required to “mitigate its effects on the highway network” without adequate qualification implies that proposals are expected to result in a NIL impact on the highway network. This removes any necessary flexibility from the Policy undermining its effectiveness. This brings the Policy into conflict with the National Policy Planning Framework (NPPF) and its focus on 'delivery' of economic growth and development. The NPPF recognises development has impacts, stating in Paragraph 32: "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". A qualification of “acceptable” levels of impact should be added to Policy C2 rather than the implied NIL impact.

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Section 6 – Connections

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• Furthermore due regard must be had to viability as referred to in response to Proposed Change 007/C.
PC011/C	Existing Paragraph 6.19 (New Paragraph 6.20)	40	0	No representations received.
PC012/C	Existing Paragraph 6.19 (New Paragraph 6.20)	40	1	Request for clarification and confirmation that statements in Policy C3 and the supporting text do not constitute any future road infrastructure between Great Billing interchange and the M1.
PC013/C	Existing Paragraph 6.19 (New Paragraph 6.20)	41	0	No representations received.
PC014/C	Existing Paragraph 6.20 (New Paragraph 6.21)	41	0	No representations received.
PC015/C	Existing Paragraph 6.21 (New Paragraph 6.22)	42	0	No representations received.
PC016/C	New Paragraph 6.23	42	0	No representations received.
PC017/C	Policy C3	42	3	<ul style="list-style-type: none">• Strongly supports the addition of reference to the “A43 Kettering to Northampton Improvements” in Policy C3 and the references in the supporting text at Paragraph 6.23 to supporting the delivery of the North Northamptonshire Core Spatial Strategy. It is considered that this is an important strategic improvement.• It would be logical to recognise that necessary road improvements also include the A5 to A43 relief road at Towcester and related A43 junction improvements. This would be justified by virtue of the improvements to the Strategic Road Network.

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Section 6 – Connections

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• Add reference to the South Towcester relief road to Policy C3.
PC020/C	Existing Paragraph 6.24 (New Paragraph 6.26)	43	0	No representations received.
PC021/C	Existing Paragraph 6.25 (New Paragraph 6.27)	43	0	No representations received.
PC022/C	Policy C4	43	0	No representations received.
PC023/C	Policy C5	44	0	No representations received.
PC024/C	Existing Paragraph 6.28 (New Paragraph 6.30)	44	0	No representations received.
PC025/C	Existing Paragraph 6.29 (New Paragraph 6.31)	44	0	No representations received.
PC026/C	Policy C6	44	0	No representations received.

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Section 7 – Regenerating and Developing Communities

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/RC	Paragraph 7.11	45	0	No representations received.
PC002/RC	Paragraph 7.19	45	0	No representations received.
PC003/RC	Table 3	45	3	<ul style="list-style-type: none">• Welcome and strongly supports the Proposed Change which will strengthen policy recognition and guidance for the voluntary sector including faith groups.• Welcome the recognition of ‘church halls’ as key facilities of benefit to the community. This is consistent with the National Planning Policy Framework and sound in all other respects.
PC004/RC	Paragraph 7.26	45	3	<ul style="list-style-type: none">• Welcome the Proposed Change and the explicit reference to "church halls" as part of the cultural infrastructure typology which is consistent with the National Planning Policy Framework and sound in all other respects.
PC005/RC	Paragraph 7.29	46	0	No representations received.
PC006/RC	Paragraph 7.31	46	0	No representations received.
PC007/RC	Paragraph 7.32	46	0	No representations received.
PC008/RC	Paragraph 7.35	46	0	No representations received.
PC009/RC	Footnote to Paragraph 7.35	47	0	No representations received.
PC010/RC	Paragraph 7.36	47	0	No representations received.
PC011/RC	Footnote to Paragraph 7.36	47	0	No representations received.
PC012/RC	Paragraph 7.42	48	0	No representations received.
PC013/RC	Policy RC2	48	12	<ul style="list-style-type: none">• The West Northamptonshire Sports Facilities Strategy and the Cultural Investment Plan have not been subject to examination. Their inclusion within Policy RC2 would have the effect of giving these documents development plan status – this is not justified.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 7 – Regenerating and Developing Communities

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The reference to previous open space/recreation studies, the West Northamptonshire Sports Facility Strategy and the Cultural Investment Plan should be removed from Policy RC2.• Policy RC2 does not comply with Community Infrastructure Levy Regulation 122.• The Joint Core Strategy should properly be a high level strategy document and should not rely upon preceding Supplementary Planning Documents which will not have been subject to examination and may pre-date the introduction of the Community Infrastructure Levy Regulations.• There is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy, in this case Policy RC2, may not be justified, effective or legally sound.• Object to the Proposed Changes to Policy RC2 on the basis that these requirements add to the cumulative burden of development of the Sustainable Urban Extensions.• A Local Plan should not be subject to such a scale of obligations, standards and policy burdens that cumulatively this threatens the plan's ability to be developed viably.

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Section 7 – Regenerating and Developing Communities

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC014/RC	Policy RC2	48	7	<ul style="list-style-type: none">• For clarity and consistency a definition of the term “community facilities” should be included either in the supporting text to Policy RC2 or in the glossary.• Community facilities should be defined as “Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community”.• Policy RC2 does not comply with Community Infrastructure Levy Regulation 122.• The Joint Core Strategy should properly be a high level strategy document and should not rely upon preceding Supplementary Planning Documents which will not have been subject to examination and may pre-date the introduction of the Community Infrastructure Levy Regulations.• There is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy in this case Policy RC2, may not be justified, effective or legally sound.• Object to the Proposed Changes to Policy RC2 on the basis that these requirements add to the cumulative burden of development of the Sustainable Urban Extensions.

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Section 7 – Regenerating and Developing Communities

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• A Local Plan should not be subject to such a scale of obligations, standards and policy burdens that cumulatively this threatens the plan's ability to be developed viably.
PC015/RC	Policy RC2	49	6	<ul style="list-style-type: none">• Policy RC2 does not comply with Community Infrastructure Levy Regulation 122.• The Joint Core Strategy should properly be a high level strategy document and should not rely upon preceding Supplementary Planning Documents which will not have been subject to examination and may pre-date the introduction of the Community Infrastructure Levy Regulations.• There is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy, in this case Policy RC2, may not be justified, effective or legally sound.• Object to the Proposed Changes to Policy RC2 on the basis that these requirements add to the cumulative burden of development of the Sustainable Urban Extensions.• A Local Plan should not be subject to such a scale of obligations, standards and policy burdens that cumulatively this threatens the plan's ability to be developed viably.

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Section 7 – Regenerating and Developing Communities

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC016/RC	Policy RC2	49	6	<ul style="list-style-type: none">• Policy RC2 does not comply with Community Infrastructure Levy Regulation 122.• The Joint Core Strategy should properly be a high level strategy document and should not rely upon preceding Supplementary Planning Documents which will not have been subject to examination and may pre-date the introduction of the Community Infrastructure Levy Regulations.• There is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy, in this case Policy RC2, may not be justified, effective or legally sound.• Object to the Proposed Changes to Policy RC2 on the basis that these requirements add to the cumulative burden of development of the Sustainable Urban Extensions.• A Local Plan should not be subject to such a scale of obligations, standards and policy burdens that cumulatively this threatens the plan's ability to be developed viably.
PC017/RC	Policy RC2	49	6	<ul style="list-style-type: none">• Policy RC2 does not comply with Community Infrastructure Levy Regulation 122.

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Section 7 – Regenerating and Developing Communities

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• The Joint Core Strategy should properly be a high level strategy document and should not rely upon preceding Supplementary Planning Documents which will not have been subject to examination and may pre-date the introduction of the Community Infrastructure Levy Regulations.• There is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy, in this case Policy RC2, may not be justified, effective or legally sound.• Object to the Proposed Changes to Policy RC2 on the basis that these requirements add to the cumulative burden of development of the Sustainable Urban Extensions.• A Local Plan should not be subject to such a scale of obligations, standards and policy burdens that cumulatively this threatens the plan's ability to be developed viably.
PC018/RC	Policy RC2	49	6	<ul style="list-style-type: none">• Policy RC2 does not comply with Community Infrastructure Levy Regulation 122.• The Joint Core Strategy should properly be a high level strategy document and should not rely upon preceding Supplementary Planning Documents which will not have been subject to examination and may pre-date the introduction of the Community Infrastructure Levy Regulations.

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Section 7 – Regenerating and Developing Communities

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• There is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy, in this case Policy RC2, may not be justified, effective or legally sound.• Object to the Proposed Changes to Policy RC2 on the basis that these requirements add to the cumulative burden of development of the Sustainable Urban Extensions.• A Local Plan should not be subject to such a scale of obligations, standards and policy burdens that cumulatively this threatens the plan's ability to be developed viably.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 8 – Economic Advantage

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/E	Paragraph 8.5	51	0	No representations received.
PC002/E	Paragraph 8.5	51	1	The Joint Core Strategy should explicitly state the need to safeguard existing employment sites, specifically the protection of the existing industrial nature of the Ransome Road area of Northampton.
PC003/E	Paragraph 8.6	52	1	<ul style="list-style-type: none">• This Proposed Change does not provide for additional land to be developed for non-strategic employment opportunities for B1 (a) and (b) and B2 uses as well as B8. The Proposed Change therefore fails to maximise the effectiveness of the overall strategy or provide sufficient flexibility to respond to market requirements.• Improve the effectiveness of the Strategy by confirming that non-strategic allocations may still come forward through Local Plans being prepared by the individual Councils.• Add reference to non-strategic opportunities and allocations for the development of land to support local jobs and business to be considered through the preparation of detailed Local Plans by the individual Councils.
PC004/E	Paragraph 8.7	52	0	No representations received.
PC005/E	Paragraph 8.8	53	0	No representations received.
PC006/E	Paragraph 8.10	53	0	No representations received.
PC007/E	Paragraph 8.11	55	0	No representations received.
PC008/E	Paragraph 8.12	55	0	No representations received.
PC010/E	Paragraph 8.13	56	0	No representations received.
PC011/E	Paragraph 8.15	56	0	No representations received.
PC012/E	Paragraph 8.18	57	0	No representations received.
PC013/E	Paragraph 8.20	57	0	No representations received.
PC014/E	Paragraph 8.29	57	0	No representations received.
PC015/E	Paragraph 8.29	58	0	No representations received.

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Section 8 – Economic Advantage

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC016/E	Policy E5	58	0	No representations received.
PC017/E	Policy E5	58	3	<ul style="list-style-type: none">• The JCS Key Diagram confirms that Silverstone Circuit is a Strategic Employment site, but Policy E5 does not clarify or recognise the strategic, national and international nature of the development proposals at the Circuit.• In order to be fully sustainable, the policy should also state that the range and extent of this strategic employment, tourism, education and leisure development at the Circuit should be accompanied by new housing provision in close proximity in the adjoining Silverstone village, as well as in the nearby towns of Towcester and Brackley. Without a supply of suitable homes nearby, in both Silverstone village and Towcester/ Brackley, it will be difficult to attract the skilled workforce required to enable the Circuit to fulfil its key strategic role as a centre of economic growth for South Northamptonshire, West Northamptonshire as a whole and beyond.• The word “strategic” should be added to the first sentence of Policy E5 before the word “employment”. The second paragraph should be amended to read: “All proposals will need to demonstrate functional links to the settlements of Towcester, Brackley and Silverstone, in particular by strengthening sustainable transport links between the Circuit and these settlements and by demonstrating that a sustainable balance would be achieved between economic and employment growth and provision of housing in these nearby and adjoining settlements.”
PC018/E	Policy E5	58	0	No representations received.
PC019/E	Policy E5	58	0	No representations received.

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Section 9 – Housing

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/H	Paragraph 9.1	59	0	No representations received.
PC002/H	Paragraph 9.4	59	0	No representations received.
PC004/H	New Paragraphs added after Paragraph 9.4 and Table 4	59	7	The Strategic Housing Market Assessment (SHMA) fails to assess full housing needs and does not identify a scale of growth that would meet household and population projections, taking account of migration and demographic change.
PC005/H	Existing Paragraph 9.6 (New Paragraph 9.8)	60	0	No representations received.
PC006/H	New Paragraph 9.11	61	12	<ul style="list-style-type: none">• The proposed change refers to a further update of the Viability Appraisal. This is considered to be fundamentally flawed and cannot be relied on to inform the Affordable Housing framework.• Full and proper consideration needs to be given to the issue of viability in the context of the NPPF and the Local Housing Delivery Group report: 'Viability Testing Local Plans' (June 2012).• The JCS is reliant on the delivery of SUEs yet the assessment of the viability of these sites is inadequate. Further discussion is required regarding the delivery of these sites.
PC007/H	Existing Paragraph 9.10 (New Paragraph 9.13)	61	0	No representations received.
PC008/H	Existing Paragraph 9.11 (New Paragraph 9.14)	62	0	No representations received.

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Section 9 – Housing

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC009/H	Existing Paragraph 9.12 (New Paragraph 9.15)	62	0	No representations received.
PC010/H	New Paragraph 9.16	63	4	The soundness of the affordable housing targets are challenged given that all sites are subject to viability assessment.
PC013/H	Existing Paragraph 9.15 (New Paragraph 9.20)	64	0	No representations received.
PC014/H	Policy H4	64	0	No representations received.
PC015/H	Existing Paragraph 9.16 (New Paragraph 9.21)	64	0	No representations received.
PC016/H	Policy H5	64	13	<ul style="list-style-type: none">• It is neither necessary nor desirable to seek to impose lifetime home standards on all dwellings. The proposed changes do not address this fundamental concern.• The inclusion of viability is welcome, but further flexibility is required to allow proposals that do not meet the lifetime homes criteria where this would compromise high quality design.• There is no need to refer to Policy S11 within Policy H5.• There is a risk that all proposals for residential development will need viability appraisals.
PC017/H	Existing Paragraph 9.19 (New Paragraph 9.24)	65	0	No representations received.

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Section 9 – Housing

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC018/H	Existing Paragraph 9.21 (New Paragraph 9.26)	65	0	No representations received.
PC019/H	Existing Paragraph 9.23 (New Paragraph 9.28)	66	0	No representations received.
PC020/H	Existing Paragraph 9.26 (New Paragraph 9.31)	66	0	No representations received.
PC021/H	Policy H7	66	2	Continued support is expressed as the proposed changes do not significantly affect the policy stance.
PC022/H	Policy H7	67	0	No representations received.

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Section 10 – Built and Natural Environment

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/BN	Paragraph 10.1	68	0	No representations received.
PC002/BN	Paragraph 10.2	68	0	No representations received.
PC003/BN	Paragraph 10.5	68	0	No representations received.
PC004/BN	Paragraph 10.6	68	0	No representations received.
PC005/BN	New Paragraph 10.8	68	1	The Joint Core Strategy should explicitly express support for the newly designated Nature Improvement Area (NIA). The name of the NIA should also be corrected to the Nene Valley Nature Improvement Area.
PC006/BN	Existing Paragraph 10.8 (New Paragraph 10.9)	69	0	No representations received.
PC007/BN	Existing Paragraph 10.11 (New Paragraph 10.12)	69	0	No representations received.
PC008/BN	Existing Paragraph 10.12 (New Paragraph 10.13)	69	0	No representations received.
PC009/BN	Policy BN1	70	8	Questions the legal compliance and soundness of the part of Policy BN1 which requires the securing of contributions from development or other sources for the creation and management of Green Infrastructure networks particularly in relation to Community Infrastructure Levy Regulation 122 and the recent Local Housing Delivery Group's report: "Viability Testing Local Plans".
PC010/BN	Existing Paragraph 10.14 (New Paragraph 10.15)	71	0	No representations received.
PC011/BN	Existing Paragraph 10.15 (New Paragraph 10.16)	71	0	No representations received.

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Section 10 – Built and Natural Environment

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC012/BN	Existing Paragraph 10.16 (New Paragraph 10.17)	71	1	The designation 'Regionally Important Geological and Geomorphologic Sites (RIGGS)' has been superseded according to the Department for Environment, Food and Rural Affairs' (DEFRA) local sites guidance. Consequently the phrase 'Regionally Important Geological and Geomorphologic Sites (RIGGS)' should be changed to 'Local Geological Sites'.
PC013/BN	Existing Paragraph 10.17 (New Paragraph 10.18)	72	0	No representations received.
PC014/BN	Existing Paragraph 10.18 (New Paragraph 10.19)	72	0	No representations received.
PC015/BN	Policy BN2	72	2	The policy should recognise the balance to be made between meeting necessary development requirements.
PC016/BN	Existing Para 10.21 (New Paragraph 10.22)	73	0	No representations received.
PC018/BN	Existing Paragraph 10.22 (New Paragraph 10.23)	74	0	No representations received.
PC019/BN	New Paragraph 10.24	74	0	No representations received.
PC020/BN	Existing Paragraph 10.23 (New Paragraph 10.25)	75	0	No representations received.
PC021/BN	New Paragraph 10.26	75	0	No representations received.
PC022/BN	New Paragraph 10.27	76	0	No representations received.
PC023/BN	New Paragraph 10.28	76	0	No representations received.
PC024/BN	New Paragraph 10.29	76	0	No representations received.
PC025/BN	New Paragraph 10.30	77	0	No representations received.

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Section 10 – Built and Natural Environment

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC026/BN	Existing Paragraph 10.24 (New Paragraph 10.31)	77	0	No representations received.
PC028/BN	Existing Paragraph 10.25 (New Paragraph 10.32)	78	0	No representations received.
PC029/BN	Existing Paragraph 10.26 (New Paragraph 10.33)	78	0	No representations received.
PC030/BN	Existing Paragraph 10.27 (New Paragraph 10.34)	78	0	No representations received.
PC031/BN	Existing Paragraph 10.28 (New Paragraph 10.35)	78	0	No representations received.
PC032/BN	Existing Paragraph 10.29 (New Paragraph 10.36)	79	1	The following corrections still need to be made to this paragraph: <ul style="list-style-type: none">○ In relation to Weedon Depot, which is usually referred to as 'the former Weedon Barracks', this consists of a group of Grade II* (not Grade II) listed buildings; and○ In the 14th line, there is still a reference to 'historic' rather than 'heritage' assets as used in the National Planning Policy Framework.
PC033/BN	Policy BN5	80	5	<ul style="list-style-type: none">● The policy should be amended as follows:<ul style="list-style-type: none">○ Deletion of “appropriately” from the second paragraph; and○ To ensure consistency with the fourth bullet point of section 1 of this policy add “potential” to the third paragraph to read: “known or potential historic or heritage significance ...”

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Section 10 – Built and Natural Environment

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">• One respondent requests that the Joint Core Strategy explicitly recognises the importance of the “Nene Ridge” through the addition of a specific policy in Section 10 of the Joint Core Strategy which requires planners and developers to give proper consideration to landscape sensitivity when developing proposals. Alternatively this could be included in section 3 of Policy BN5.• The policy wording is not justified and should be consistent with the National Planning Policy Framework.
PC034/BN	Existing Paragraph 10.32 (New Paragraph 10.39)	82	0	No representations received.
PC035/BN	Existing Paragraph 10.33 (New Paragraph 10.40)	83	0	No representations received.
PC036/BN	Existing Paragraph 10.34 (New Paragraph 10.41)	83	0	No representations received.
PC037/BN	Existing Paragraph 10.36 (New Paragraph 10.43)	83	0	No representations received.
PC038/BN	Existing Paragraph 10.39 (New Paragraph 10.46)	84	0	No representations received.
PC039/BN	Policy BN6	84	0	No representations received.
PC040/BN	Policy BN6	84	0	No representations received.
PC041/BN	Section Heading before Existing Paragraph 10.40	84	0	No representations received.

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Section 10 – Built and Natural Environment

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC042/BN	Existing Paragraph 10.40 (New Paragraph 10.47)	84	0	No representations received.
PC043/BN	Existing Paragraph 10.41 (New Paragraph 10.48)	85	0	No representations received.
PC044/BN	Existing Paragraph 10.43 (New Paragraph 10.49)	85	0	No representations received.
PC045/BN	Existing Paragraph 10.42 (New Paragraph 10.50)	85	0	No representations received.
PC046/BN	New Paragraph 10.51	86	0	No representations received.
PC047/BN	Existing Paragraph 10.44 (New Paragraph 10.52)	86	0	No representations received.
PC048/BN	Existing Paragraph 10.45 (New Paragraph 10.53)	87	0	No representations received.
PC049/BN	New Paragraph 10.54	87	0	No representations received.
PC050/BN	New Paragraph 10.55	88	0	No representations received.
PC051/BN	Existing Paragraph 10.48 (New Paragraph 10.58)	88	0	No representations received.
PC052/BN	Table 6 Exception Test	89	0	No representations received.
PC055/BN	Policy BN8	89	0	No representations received.
PC056/BN	Existing Paragraph 10.52 (New Paragraph 10.62)	89	0	No representations received.
PC057/BN	Existing Paragraph 10.53 (New Paragraph 10.63)	90	0	No representations received.
PC058/BN	Existing Paragraph 10.54 (New Paragraph 10.64)	90	0	No representations received.
PC059/BN	New Paragraph 10.65	90	0	No representations received.
PC061/BN	Existing Paragraph 10.60	91	0	No representations received.

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Section 11 – Infrastructure and Delivery

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/ID	Paragraph 11.8	92	0	No representations received.
PC002/ID	Paragraph 11.9	92	0	No representations received.
PC003/ID	Policy INF1	92	10	<ul style="list-style-type: none">• The phrase that is proposed for deletion should be retained. If adequate capacity exists there is no need to make further provision for infrastructure.• There needs to be a clear policy requirement for a joined-up and co-ordinated approach to the delivery of infrastructure by all agencies, particularly those within the public and third sectors, in accordance with the Infrastructure Delivery Plan where contributions have been paid.• The approach to infrastructure delivery does not overly accord with CIL Regulation 122.• The proposed change is not sufficiently robust in requiring infrastructure to be in place in a timely manner. It places responsibility for infrastructure provision on developers rather than planning authorities that are accountable to the electorate. The second paragraph of Policy INF1 should be amended to read: "WHERE DEVELOPMENT GENERATES A NEED FOR NEW INFRASTRUCTURE, PLANNING AUTHORITIES WILL ENSURE THAT PROVISION IS MADE IN A TIMELY AND SUSTAINABLE MANNER"

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Section 11 – Infrastructure and Delivery

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
				<ul style="list-style-type: none">Further clarification is sought on how developers can achieve behavioural change or efficiencies relating to the provision of services such as Policing and Fire and Rescue.
PC004/ID	Paragraph 11.12	94	0	No representations received.
PC005/ID	Paragraph 11.17	94	1	Contributions to flood risk management infrastructure should be included in the list of types of infrastructure in Paragraph 11.17 to improve clarity, consistency with national policy and limit the scope for misinterpretation.
PC006/ID	Title before Paragraph 11.18	94	0	No representations received.
PC007/ID	Paragraph 11.19	94	0	No representations received.
PC008/ID	Paragraph 11.20	95	0	No representations received.
PC009/ID	Existing Paragraph 11.21 (New Paragraph 11.20)	95	0	No representations received.
PC010/ID	Existing Paragraph 11.22	95	0	No representations received.
PC011/ID	Existing Paragraph 11.23 (New Paragraph 11.21)	95	0	No representations received.
PC012/ID	Paragraph 11.24	96	0	No representations received.
PC013/ID	Existing Paragraph 11.26 (New Paragraph 11.23)	96	0	No representations received.
PC015/ID	Existing Paragraph 11.32 (New Paragraph 11.29)	96	0	No representations received.
PC030/ID	Existing Paragraph 11.37 (New Paragraph 11.34)	97	0	No representations received.

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Section 12 – Northampton

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/N	Paragraph 12.4	98	0	No representations received.
PC002/N	Paragraph 12.6	98	0	No representations received.
PC003/N	Paragraph 12.9	98	0	No representations received.
PC004/N	Paragraph 12.11	98	0	No representations received.
PC006/N	Paragraph 12.18	99	0	No representations received.
PC008/N	Paragraph 12.21	99	0	No representations received.
PC009/N	Paragraph 12.24	99	0	No representations received.
PC010/N	Paragraph 12.27	99	0	No representations received.
PC012/N	Paragraph 12.29	100	0	No representations received.
PC014/N	Paragraph 12.30	100	0	No representations received.
PC015/N	Paragraph 12.31	100	0	No representations received.
PC016/N	Paragraph 12.33	100	0	No representations received.
PC018/N	Paragraph 12.39	101	0	No representations received.
PC019/N	Existing Paragraph 12.43	101	0	No representations received.
PC021/N	Existing Paragraph 12.50	101	0	No representations received.
PC023/N	Existing Paragraph 12.53 (New Paragraph 12.51)	101	0	No representations received.
PC025/N	Existing Paragraph 12.57 (New Paragraph 12.55)	102	0	No representations received.
PC027/N	Existing Paragraph 12.59 (New Paragraph 12.57)	102	0	No representations received.
PC029/N	Existing Paragraphs 12.65 and 12.66 (New Paragraphs 12.63 and 12.64)	102	0	No representations received.
PC030/N	Existing Paragraph 12.67 (New Paragraph 12.65)	102	0	No representations received.
PC031/N	Existing Paragraph 12.68 (New Paragraph 12.66)	102	0	No representations received.

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Section 12 – Northampton

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC032/N	Existing Paragraph 12.70 (New Paragraph 12.68)	103	0	No representations received.
PC034/N	Existing Paragraph 12.72 (New Paragraph 12.70)	103	0	No representations received.
PC035/N	Existing Paragraph 12.74 (New Paragraph 12.72)	103	0	No representations received.
PC036/N	Existing Paragraphs 12.77 and 12.78 (New Paragraph 12.75)	104	1	The designation of local centres within the Sustainable Urban Extensions (SUEs) cannot be justified without an appraisal of local shopping within the existing urban area. The reference to local centres in the SUEs should be deleted.
PC038/N	Existing Paragraph 12.82 (New Paragraph 12.80)	105	0	No representations received.
PC039/N	Existing Paragraph 12.83 (New Paragraph 12.81)	105	0	No representations received.
PC040/N	Existing Paragraph 12.84 (New Paragraph 12.82)	105	0	No representations received.
PC041/N	Existing Paragraph 12.88 (New Paragraph 12.86)	106	0	No representations received.
PC042/N	Existing Paragraph 12.89 (New Paragraph 12.87)	106	0	No representations received.
PC043/N	Policy N11	106	0	No representations received.
PC044/N	New Paragraph 12.96	107	0	No representations received.

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Section 13 – Daventry

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/D	Paragraph 13.3	108	0	No representations received.
PC002/D	Paragraph 13.5	108	0	No representations received.
PC003/D	Paragraph 13.6	108	0	No representations received.
PC004/D	Paragraph 13.7	108	0	No representations received.
PC005/D	Paragraph 13.9	109	0	No representations received.
PC006/D	Paragraph 13.11	109	0	No representations received.
PC007/D	Paragraph 13.15	109	0	No representations received.
PC008/D	Paragraph 13.18	109	0	No representations received.
PC009/D	Paragraph 13.18	110	0	No representations received.
PC010/D	Paragraph 13.19	110	0	No representations received.
PC011/D	Policy D1	110	0	No representations received.
PC012/D	Policy D1	110	0	No representations received.
PC013/D	Policy D1	110	0	No representations received.
PC016/D	Paragraph 13.23	110	0	No representations received.
PC017/D	Paragraph 13.24	111	0	No representations received.
PC018/D	Paragraph 13.25	111	0	No representations received.
PC019/D	Paragraph 13.25	111	0	No representations received.
PC020/D	Paragraph 13.25	111	0	No representations received.
PC021/D	Paragraph 13.27	111	0	No representations received.
PC022/D	Paragraph 13.30	111	0	No representations received.
PC023/D	Paragraph 13.31	111	0	No representations received.
PC024/D	Paragraph 13.32	112	0	No representations received.
PC026/D	Policy D3	112	1	Lack of primary and junior school places in the Daventry area is well known and should be addressed as soon as possible.
PC028/D	Policy D3	112	0	No representations received.
PC029/D	Policy D3	112	0	No representations received.
PC030/D	Policy D3	113	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 13 – Daventry

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC031/D	Policy D4	113	0	No representations received.
PC032/D	Paragraph 13.35	113	0	No representations received.
PC033/D	Policy D5	113	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 14 – Towcester

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/T	Paragraph 14.7	114	0	No representations received.
PC002/T	Paragraph 14.8 and 14.9	115	0	No representations received.
PC003/T	Policy T1	115	0	No representations received.
PC004/T	Policy T2	115	0	No representations received.
PC007/T	Policy T4	115	0	No representations received.
PC008/T	Existing Paragraph 14.22 (New Paragraph 14.25)	115	0	No representations received.
PC009/T	Existing Paragraph 14.25 (New Paragraph 14.28)	116	0	No representations received.
PC010/T	Policy T5	116	0	No representations received.
PC011/T	Policy T5	117	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 15 – Brackley

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/B	Paragraph 15.3	118	0	No representations received.
PC002/B	Paragraph 15.7	118	0	No representations received.
PC003/B	Paragraph 15.8	119	0	No representations received.
PC004/B	Paragraph 15.10	121	0	No representations received.
PC005/B	Paragraph 15.12	122	0	No representations received.
PC006/B	Paragraph 15.13	122	0	No representations received.
PC007/B	Policy B1	123	0	No representations received.
PC008/B	Paragraph 15.16	123	0	No representations received.
PC009/B	Paragraph 15.18	123	0	No representations received.
PC011/B	Paragraph 15.21	123	0	No representations received.
PC012/B	Paragraph 15.25	124	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 16 – Rural Areas

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/R	Paragraph 16.4	125	4	<ul style="list-style-type: none">• The opportunity to create new settlements in rural areas should be acknowledged in accordance with the National Planning Policy Framework (NPPF).• The sentiments expressed in the Proposed Change about supporting the role of local communities are not reflected in the ‘top down’ policy approach in Policy H2.• The Proposed Change should refer to the possibility of allowing market housing to support the provision of affordable housing in rural areas in accordance with the NPPF.
PC002/R	Paragraph 16.8	125	0	No representations received.
PC003/R	Paragraph 16.9	125	0	No representations received.
PC004/R	Policy R1/ Paragraph 16.9	126	1	<ul style="list-style-type: none">• The rural settlement hierarchy is a strategic matter and should be defined in the JCS.• Moulton should be defined as a ‘Primary Service Village’ within the JCS.
PC005/R	Paragraph 16.10	126	1	<ul style="list-style-type: none">• The paragraph should be amended to make it clear that the category of settlement and the scale of growth will be based on robust and up to date evidence and analysis of the factors specified in Policy R1.
PC006/R	Paragraph 16.10 a)	126	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 16 – Rural Areas

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC007/R	Paragraph 16.15	126	1	<ul style="list-style-type: none">• The proposed change to the date from 2006 to 2011 is not justified and does not take account of the implementation of the Interim Rural Housing Policy in South Northamptonshire (IRHP).• A base date of 2010 would take account of the IRHP, whilst at the same time ensuring flexibility for villages to meet their housing needs.
PC008/R	New Paragraphs after Paragraph 16.15	127	1	<ul style="list-style-type: none">• The residual requirement of 1,355 dwellings for Daventry rural area is not accepted.
PC009/R	Existing Paragraph 16.16 (New Paragraphs 16.18 and 16.19)	128	0	No representations received.
PC011/R	Policy R2	129	0	No representations received.
PC012/R	Policy R2	130	0	No representations received.
PC013/R	Existing Paragraph 16.23 (New Paragraph 16.26)	130	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 17 – Monitoring and Review

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/M	Paragraph 17.1	131	0	No representations received.
PC002/M	Paragraph 17.1	131	0	No representations received.
PC003/M	Paragraph 17.2	131	0	No representations received.
PC005/M	Existing Paragraph 17.4 (New Paragraph 17.5)	131	0	No representations received.
PC006/M	Existing Paragraph 17.5 (New Paragraph 17.6)	132	0	No representations received.
PC007/M	Existing Paragraph 17.5 (New Paragraph 17.6)	132	0	No representations received.
PC008/M	Existing Paragraph 17.5 (New Paragraph 17.6)	132	0	No representations received.
PC009/M	Existing Paragraph 17.6 (New Paragraph 17.7)	132	0	No representations received.
PC010/M	Existing Paragraph 17.7 (New Paragraph 17.8)	132	0	No representations received.
PC012/M	Existing Paragraph 17.8 (New Paragraph 17.9)	132	0	No representations received.
PC013/M	Existing Paragraph 17.8 (New Paragraph 17.9)	133	0	No representations received.
PC014/M	Existing Paragraph 17.9 (New Paragraph 17.10)	133	0	No representations received.
PC015/M	Existing Paragraph 17.9 Parts a and b (New Paragraph 17.10)	133	0	No representations received.
PC016/M	Existing Paragraph 17.9 Part c (New Paragraph 17.10)	134	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 17 – Monitoring and Review

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC017/M	Existing Paragraph 17.10 (New Paragraph 17.11)	134	0	No representations received.
PC018/M	Existing Paragraph 17.10 (New Paragraph 17.11)	135	0	No representations received.
PC019/M	Existing Paragraph 17.10 (New Paragraph 17.11)	135	0	No representations received.
PC020/M	Existing Paragraph 17.11 (New Paragraph 17.12)	135	0	No representations received.
PC021/M	Existing Paragraph 17.12 (New Paragraph 17.13)	135	0	No representations received.
PC022/M	Existing Paragraph 17.13 (New Paragraph 17.14)	136	0	No representations received.
PC023/M	New Paragraph 17.15	137	0	No representations received.
PC024/M	Existing Paragraph 17.14 (New Paragraph 17.16)	137	0	No representations received.
PC025/M	Existing Paragraph 17.16 (New Paragraph 17.18)	137	0	No representations received.
PC027/M	Existing Paragraph 17.16 (New Paragraph 17.18)	137	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18 – List of Appendices

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/A	List of Appendices	139	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 1 – Plans and other Strategies Taken into Account in the Preparation of the Joint Core Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/A1	National	140	0	No representations received.
PC002/A1	National	140	0	No representations received.
PC003/A1	National	140	0	No representations received.
PC004/A1	National	140	0	No representations received.
PC005/A1	National	140	0	No representations received.
PC006/A1	National	140	0	No representations received.
PC007/A1	National	140	0	No representations received.
PC008/A1	National	140	0	No representations received.
PC009/A1	National	140	0	No representations received.
PC010/A1	Local	141	0	No representations received.
PC011/A1	Local	141	0	No representations received.
PC012/A1	Local	141	0	No representations received.
PC013/A1	Local	141	0	No representations received.
PC014/A1	Local	141	0	No representations received.
PC015/A1	Local	141	0	No representations received.
PC016/A1	Local	141	0	No representations received.
PC017/A1	Local	141	0	No representations received.
PC018/A1	Local	141	0	No representations received.
PC019/A1	Local	141	0	No representations received.
PC020/A1	Local	142	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 2 – Evidence Base for the Joint Core Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/A2	General	143	1	The Village Services and Facilities Study (2011) should not be labelled as 'complete' due to the removal of Appendix 2 of the document pending review. As a result of this Study being incomplete it is considered that the Joint Core Strategy should not be progressed until this Study is complete as it provides the evidence base for the Settlement Hierarchy set out in Policy R1. Given Long Buckby's position as the second largest settlement in Daventry District, and that it contains a broad range of services and facilities, it is considered that Long Buckby should be designated as a Primary Service Village within the Village Services and Facilities Study and allowed to expand beyond the existing settlement boundary.
PC002/A2	General	143	0	No representations received.
PC003/A2	General	143	0	No representations received.
PC004/A2	Transport Related	143	0	No representations received.
PC005/A2	Transport Related	143	0	No representations received.
PC006/A2	Transport Related	143	0	No representations received.
PC007/A2	Transport Related	143	0	No representations received.
PC008/A2	Employment Related	143	0	No representations received.
PC009/A2	Employment Related	143	0	No representations received.
PC010/A2	Employment Related	143	0	No representations received.
PC011/A2	Employment Related	143	0	No representations received.
PC012/A2	Housing Related	144	0	No representations received.
PC013/A2	Housing Related	144	0	No representations received.
PC014/A2	Housing Related	144	0	No representations received.
PC015/A2	Housing Related	144	0	No representations received.
PC016/A2	Housing Related	144	0	No representations received.
PC017/A2	Housing Related	144	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 2 – Evidence Base for the Joint Core Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC018/A2	Housing Related	144	0	No representations received.
PC019/A2	Housing Related	144	0	No representations received.
PC020/A2	Housing Related	144	0	No representations received.
PC021/A2	Housing Related	144	0	No representations received.
PC022/A2	Housing Related	144	0	No representations received.
PC023/A2	Built and Natural Environment Related	144	0	No representations received.
PC024/A2	Built and Natural Environment Related	145	0	No representations received.
PC025/A2	Built and Natural Environment Related	145	0	No representations received.
PC026/A2	Built and Natural Environment Related	145	0	No representations received.
PC027/A2	Infrastructure Related	145	0	No representations received.
PC028/A2	Infrastructure Related	145	0	No representations received.
PC029/A2	Leisure and Retail Related	145	0	No representations received.
PC030/A2	Leisure and Retail Related	145	0	No representations received.
PC031/A2	Daventry – Transport Related	145	0	No representations received.
PC032/A2	Northampton – Transport Related	145	0	No representations received.
PC033/A2	Northampton – Housing Related	145	0	No representations received.
PC034/A2	South Northamptonshire Council - General	146	0	No representations received.
PC035/A2	South Northamptonshire Council - General	146	0	No representations received.
PC036/A2	South Northamptonshire Council – General	146	0	No representations received.
PC037/A2	South Northamptonshire Council – Transport Related	146	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 2 – Evidence Base for the Joint Core Strategy

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC038/A2	South Northamptonshire Council – Employment Related	146	0	No representations received.
PC039/A2	South Northamptonshire Council – Housing Related	146	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 3 – West Northamptonshire Housing Trajectory

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/A3	Table – Actual Completions 2001/02 – 2009/10	147	0	No representations received.
PC002/A3	Table – Projected Completions Trajectory	147	0	No representations received.
PC003/A3	Table – Projected Completions Trajectory	147	0	No representations received.
PC004/A3	Add new table – “B. Completions 2001-2011 and Proposed Trajectory by Northampton Related Development Area (NRDA) and Residuals for Daventry District and South Northamptonshire Council Areas	147	0	No representations received.
PC005/A3	New table (part of B) – Projected Completions Trajectory	148	0	No representations received.
PC006/A3	Chart showing projected housing completions by Council area (2010-2026) replaced with chart showing the period 2011-2026	148	0	No representations received.
PC007/A3	New Chart showing projected housing completions by NRDA and residual Council area (2011-2026)	148	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 18/ Appendix 5 – Saved Local Plan Policies to be Replaced by Joint Core Strategy Policies

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/A5	Pretext	155	0	No representations received.
PC002/A5	Pretext	155	0	No representations received.
PC003/A5	New Section	155	0	No representations received.
PC004/A5	Daventry (Policy HS2)	155	0	No representations received.
PC005/A5	Daventry (Policy HS25)	155	0	No representations received.
PC006/A5	Daventry (Policy EM4)	155	0	No representations received.
PC007/A5	Daventry (Policy CM8)	155	0	No representations received.
PC008/A5	Daventry (Policy RC2)	155	0	No representations received.
PC009/A5	Northampton (Policy E12)	155	0	No representations received.
PC010/A5	Northampton (Policy B13)	155	0	No representations received.
PC011/A5	Northampton (Policy T14)	155	0	No representations received.
PC012/A5	Northampton (Policy D1)	156	0	No representations received.
PC013/A5	Northampton (Policy D7)	156	0	No representations received.
PC014/A5	South Northamptonshire (Policy H3)	156	0	No representations received.
PC015/A5	South Northamptonshire (Policy TH2)	156	0	No representations received.
PC016/A5	South Northamptonshire (Policy TRC4)	156	0	No representations received.
PC017/A5	South Northamptonshire (Policy WFH1)	156	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 19 – Glossary of Terms and Abbreviations

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/G	Affordable Housing	157	0	No representations received.
PC002/G	Ancient Woodlands	157	0	No representations received.
PC003/G	Application Approved in Principle (AIP)	157	0	No representations received.
PC004/G	D2 Assembly and leisure	157	0	No representations received.
PC005/G	Development Plan Document (DPD)	157	0	No representations received.
PC006/G	District Centre	157	0	No representations received.
PC007/G	Environment Agency	158	0	No representations received.
PC008/G	Interchanges	158	0	No representations received.
PC009/G	Local Centre	158	0	No representations received.
PC010/G	Local Development Documents	158	0	No representations received.
PC011/G	Local Development Framework (LDF)	159	0	No representations received.
PC012/G	Local Development Orders	159	0	No representations received.
PC013/G	Local Plan	159	0	No representations received.
PC014/G	Local Strategic Partnership	160	0	No representations received.
PC015/G	Localism Act	160	0	No representations received.
PC016/G	National Planning Policy Framework (NPPF)	160	0	No representations received.
PC017/G	Northamptonshire Enterprise Limited	160	0	No representations received.
PC018/G	Open Book Approach	161	0	No representations received.
PC019/G	Planning Policy Guidance Notes (PPGs)	161	0	No representations received.
PC020/G	Planning Policy Statements	161	0	No representations received.
PC021/G	Strategic Environment Assessment	162	0	No representations received.
PC022/G	Sustainable Urban Extensions (SUE's)	162	0	No representations received.
PC023/G	Water Cycle Study (Phase 1)	162	0	No representations received.
PC024/G	Water Cycle Study (Phase 2)	162	0	No representations received.
PC025/G	West Northamptonshire Employment Land Study (WNELS)	163	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 20 – Maps and Key Diagrams

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC001/MK	Figure 2 and Figure 3	164	0	No representations received.
PC002/MK	New Figure 3-1	165	1	The notations on the two Key Diagram plans Figure 2 and Figure 3-1 should be amended to accord with the location of the Daventry International Rail Freight Terminal (DIRFT) and Policy E4 locations as shown on the submitted amended plans.
PC003/MK	Figure 4	165	0	No representations received.
PC004/MK	Figure 5 and all Inset Maps	165	1	<p>Figure 5 - The Legend contains no definition of the green shading for the Towcester South site meaning that it is not possible to establish from Figure 5 what this shading is supposed to indicate. This is a clear technical omission and although an objection was made to the 2011 version of the WNJCS in this regard, no amendment has been made to Figure 5. Furthermore, (and assuming the reference is for a town park), it is considered inappropriate for the site to be subject to a blanket designation for such a use on Figure 5 because no other existing or proposed public parks in the West Northamptonshire JCS area are identified on Figure 5 (including the existing parks in Towcester) and because Inset Map 3 is considered to be a more appropriate medium for the designation of land as part of the Towcester South SUE in any event. The following amendment is sought to Figure 5: 'Delete the green shading covering the site.'</p> <p>This requires consequential amendments to Paragraph 14.18 (formerly Paragraph 14.16) by deleting the second sentence and by deleting the first sentence of Paragraph 14.19 (formerly Paragraph 14.17). Further changes addressing this objection are also required to Inset Map 3 and Policy T3 (See representations submitted separately for these Proposed Changes).</p>

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 20 – Maps and Key Diagrams

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC005/MK	Inset Map 1	165	4	Inset Map 1 of Figure 5 - It is considered that the curtilage of the property named The Glebe should not have been excluded from the Brackley North SUE. The red line around The Glebe property should be removed on Inset Map 1 of Figure 5.
PC006/MK	Inset Map 2	166	0	No representations received.
PC007/MK	Inset Map 3	166	1	Inset Map 3 of Figure 5 - It is inappropriate to impose a blanket designation for “Indicative Structural Green Space associated with SUEs” across the entire site. This is inconsistent with the explicit recognition in the adopted Towcester Masterplan and WNJCS that the site is suitable for some residential development. The following amendments are sought: Delete the designation of the site as “Indicative Strategic Green Space associated with SUEs” and replace with “Area of Search for New Town Park” together with consequential alterations to the key and text at new Paragraphs 14.18, 14.19 and Policy T3.
PC008/MK	Inset Map 4	166	0	No representations received.
PC009/MK	Inset Map 5	167	0	No representations received.
PC010/MK	Inset Map 6	167	0	No representations received.
PC011/MK	Inset Map 7	167	0	No representations received.
PC012/MK	Inset Map 8	167	0	No representations received.
PC013/MK	Inset Map 9	168	0	No representations received.
PC014/MK	Inset Map 10	168	0	No representations received.
PC015/MK	Inset Map 11	169	0	No representations received.
PC016/MK	Inset Map 12	169	0	No representations received.
PC017/MK	Inset Map 13	169	0	No representations received.
PC018/MK	Inset Map 14	170	0	No representations received.
PC019/MK	Inset Map 15	170	0	No representations received.
PC020/MK	Figure 6	170	0	No representations received.

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Table 2 - Summary of the Main Issues Raised by the Representations to the Minor Proposed Changes to the Pre-Submission Joint Core Strategy

Section 20 – Maps and Key Diagrams

Proposed Changes	Policy/ Section	Page Number	Number of Representations	Summary of the Main Issues Raised by the Representations
PC021/MK	New Figure 7	171	0	No representations received.