



Report to the North Northamptonshire Joint Planning Unit

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12 May 2008

PLANNING & COMPULSORY PURCHASE ACT 2004 (SECTION 20)

REPORT OF THE EXAMINATION INTO THE NORTH NORTHAMPTONSHIRE CORE SPATIAL STRATEGY

Hearings into Examination held between 23 October 2007 and 13 February 2008

Introduction

1. The purpose of an independent examination of a Development Plan Document (DPD) under section 20(5) of the Planning and Compulsory Purchase Act 2004 is to determine whether the DPD (a) satisfies the requirements of S19 & S24 (1) of the Act and any regulations made under S17 (7) & S36 relating to the preparation of DPDs, and (b) is sound.
2. The Joint Planning Unit (JPU) has produced a document that contains a spatial framework and policies that form a strategic basis for the Development Plan Documents which are to follow. The Core Spatial Strategy (CSS) provides a clearly identifiable spatial vision. Some of the policies and the wording of the Plan have been challenged on the grounds of soundness. This is to be expected, but the approach of the JPU, avoiding the detail that should be contained in later Development Plan Documents, reflects the purpose and intent of a CSS.
3. I assess the Core Spatial Strategy against the nine tests of soundness set out in Planning Policy Statement (PPS) 12: Local Development Frameworks - and I make my assessment in the context of those matters that I identified as the basis for the examination.
4. At my request a schedule of extant policies to be superseded was prepared by the Joint Planning Unit to meet the requirements of Regulation 13 (5) of the Act. This is provided at Appendix 2 to my report and, once formally agreed by the local planning authorities, should form an Appendix to the Core Spatial Strategy.
5. I find some wording of the Core Spatial Strategy unsound under tests vi –ix but readily capable of appropriate change without infringing the procedural tests.
6. As far as housing and employment are concerned I recommend changes which will make the Core Spatial Strategy (CSS) sound, pending an early review to provide longer term certainty as the soundness of the CSS is less evident in the later stages of the plan. I do this in the knowledge that Core Strategies are intended to provide a context for long term planning decisions. However, it would be naive to expect that the latter stages of a CSS many years ahead can be judged completely sound and this is the reason why monitoring and review are an important part of the on-going process
7. Although I find the Core Spatial Strategy sound, an early review will be required because in the longer term sound evidence of funding the infrastructure to ensure the development takes place as programmed is not yet available to the North Northants Development Company, nor is the highways agency programme. I

am, however, happy that the emerging Sustainable Urban Extensions, which are already the subject of current proposals and planning applications, will initiate the step change in North Northamptonshire, thus enabling compliance with soundness test iv. Later development will depend on the yet to be agreed highway and infrastructure funding programme. (The Joint Planning Unit is already committed to an early review of the Core Strategy to commence later this year).

The procedural tests (i-iii)

8. I found that the Core Spatial Strategy was prepared in accordance with the framework of the Local Development Scheme so the first test of soundness is met. Also I have found nothing to suggest that the consultations at the preparatory stages and more recently on the Schedule of Changes did not comply with the requirements of the 2004 Regulations in relation to the requirement for community involvement. Consequently the second test is also met.
9. The Core Spatial Strategy was subjected to a sustainability appraisal (SA) and strategic environmental assessment (SEA). In relation to future patterns of development the sustainability appraisal was critical of the distribution of growth mainly in the Kettering area and the sustainability of the development in the smaller settlements of North Northamptonshire identified in Table 5. I have dealt with this below under The Spatial Strategy. On the evidence I have concluded that the third test is also satisfied.
10. **In order to make the Core Spatial Strategy (CSS) sound to meet the provisions of Regulation 13(5) I recommend that Appendix 2 containing a schedule of superseded policies be added to the CSS.**
11. **I conclude that the Development Plan Document satisfies the requirements of S19 & S24 (1) of the Act and any regulations made under S17 (7) & S36 relating to the preparation of Development Plan Documents.**

The “conformity” tests (iv-v)

12. I find the Joint Planning Unit have produced a strategic spatial plan which is consistent with national policy and is in general conformity with the regional spatial strategy. It provides an identifiable “spatial vision” with a meaningful local perspective.
13. It was put to me at Examination that the Core Spatial Strategy (CSS) would not be in conformity with some emerging

Development Plan Documents. These are not before me, and the CSS, as its name clearly states, is the “core” on which other documents must be based, and be in conformity with.

14. Schedules A, B, C and D - Proposed Changes – which form Appendix 1 to my report, were produced for me by the Joint Planning Unit. (Document 906). Proposed Changes A and B were suggested by the Joint Planning Unit following representations and C are minor changes to which the Joint Planning Unit is not opposed. Further changes in Schedule D (Document 920) resulted from discussion at public examination and were requested by me. Many of the changes comprise points of clarification or changed emphasis, together with revisions to take account of updated technical information and/or national guidance and should be incorporated into the Core Spatial Strategy. These changes are shown in Appendix 1 to my report. For clarity, where I have not recommended a proposed change I have shown it struck through as a deletion and have cross-referenced any revised wording to my report.
15. In some cases the suggested changes alter the sense of the policy, or how it should be applied. These were subject to public consultation. Where I am of the view that such changes involve an issue of soundness I have considered them alongside other matters of soundness raised during the Examination and have incorporated any recommended changes into my report
16. The above changes and my recommendations will result in some new policy and paragraph numbers, and figures, in the final document. This may affect the contents page and cross-referencing. The Joint Planning Unit should make these and other final minor editorial corrections to update the Core Spatial Strategy, some of which have already been previewed in Document 925.
17. The issues in the Introduction at Section 1, and the Issues, Vision and Objectives at Section 2, and Section 4 – Building Sustainable Communities are all closely related to The Spatial Strategy at Section 3. This latter section in my view incorporates the main policies concerned with the delivery of the step change required to meet the aims of the Core Spatial Strategy. I have concentrated my report and recommendations on these.
18. Although there were representations on the grounds of soundness to the vision and objectives of the Core Spatial Strategy in Section 2 I do not find these principles unsound. The supporting text reflects the step change required but for soundness this should be also stated in the Vision for North Northamptonshire.
19. **In order to make the Core Spatial Strategy sound the following changes are necessary**

- a. The second paragraph of the Vision for North Northamptonshire should start “**A step change of** growth in homes and jobs etc.....”
- b. The term “niche roles” is too confining and should be deleted from paragraphs 3.2, 3.3, and 3.4 and be replaced **with different focus**. This latter change would be in accordance with Proposed Change D2.
- c. Editorial corrections should be made to the policy, paragraph and figure numbering in the final document to take into account my recommended changes.
- d. I also recommend those changes, which I have not specifically referred to in my report, shown in the schedules at Appendix 1.

THE SPATIAL STRATEGY

A Strong Network of Settlements

20. Policy 12 supports the Technology Realm Initiative that envisages a high quality employment site at each growth town.
21. I consider that Policy 12 recognises at criterion (c) that not only town centres but also *“other areas with good public transport links are preferred locations for office development and that new sites will be allocated to meet any identified shortfall in supply”*. Also paragraph 3.92 of the supporting text accepts *high quality sites other than in town centres, including Sustainable Urban Extensions*. I find this approach is not unduly restrictive, provides flexibility and is sound under test ix. I have also considered Policy 12 later in this report where I deal with Delivering Economic Prosperity.
22. Lack of retail hierarchy in Regional Spatial Strategy resulted in an extensive study of Town Centre Roles and Relationships. Kettering is the largest and most important retail centre at present in the Core Strategy area. Although a “three centre ” strategy was identified in the Town Centre Roles and Relationships Study (Document 713) it also recommends that Kettering assumes the role of a strong sub regional retail centre. Paragraph 3.102 provides an indicative range of floor space clearly showing the more important role of Kettering for retailing, and in paragraph 3.4 Kettering is also recognised as the main retail centre. The Core Strategy accepts that each town centre should grow on its

particular strengths and with a different focus. I assume Area Action Plans will identify these strengths in more detail on the basis of indicators in the Core Strategy.

23. I agree with the representors that it is unlikely that there would eventually be three or four strategic office parks, or three sub regional retail centres, but the supporting text and Policy 12 are flexible enough for new employment sites to be allocated where required. I believe the Core Spatial Strategy (CSS) points the way for the future direction of the town centres. Regardless of the proposed “balanced approach” in the CSS, it seems to me that the market will ultimately have a considerable influence on the success or otherwise of each town centre to fulfil its particular role identified in the supporting text at paragraph 3.102.
24. Paragraph 1.22 needs clarification for soundness under test vii. Because of the vast investment of resources in the Sustainable Urban Extensions (SUEs) the Core Spatial Strategy (CSS) should recognise that additional growth after 2021 will be firstly directed to identified SUEs that have potential for expansion. Local Development Documents and Master Plans may determine the eventual scale of SUEs. The latter change will be incorporated for soundness into paragraph 3.68 under Proposed Change C23. Proposed Change D8 later in this report deals with the continuous delivery of housing for at least 15 years from the date of adoption. Section E of the CSS on Delivering Housing already relates the review of this Plan to an updated Regional Spatial Strategy document. It does not have to be repeated here.
25. I was concerned about the amount of development proposed for the smaller towns and settlements of North Northamptonshire when compared for the total at Kettering. However, it became clear from the examination that the starting point for the figures in Table 5 was the regional strategy in Regional Spatial Strategy 8. The figures were based on a number of factors, including the recognition that the pattern of development in the immediate future would be in part governed by housing already “in the pipeline”, through existing local plan commitments and planning permissions. Also about one third of the development has already taken place. I, therefore, found Table 5 to be a realistic assessment of future housing development and not unsound under test vi.
26. Proposed Change A3 deals with a potential misinterpretation that local needs justification would be required within village boundaries. Whereas the original wording was unclear I consider the proposed change A3 affecting Policy 1 to be sound in part under vii. Whether particular brownfield sites adjacent to village boundaries should be included within a future village development boundary is a matter to be determined by subsequent Development Plan Documents, not arbitrarily in principle through a Core Spatial Strategy.

27. **In order to make the Core Spatial Strategy sound the following changes are necessary.**

- a. Paragraph 3.11 should have an additional sentence at the end. **The town centres are, however, constrained and while emphasis will be on their regeneration, other complementary sites will be required either edge of town or out of town to fulfil the growth strategy and meet the need for early investment.**
- b. Also I do not find the last sentence of Proposed Change A3 clear enough to be sound under test vii. Delete and substitute **Development will be focussed on those villages that perform a sustainable local service centre role.**
- c. Delete the last sentence of paragraph 1.22 and replace with **Potential further Sustainable Urban Extensions will be determined through a future review of the North Northamptonshire Core Spatial Strategy. However, priority will be given to expanding existing Sustainable Urban Extensions at the broad locations identified by this strategy.**

Delivering Infrastructure

28. To my mind the most crucial issue which would affect the provision of development over the whole of the plan period is the lack of information on a programme of infrastructure, lack of information on the bids by the North Northants Development Company for funding, and on highway improvements.

29. North Northamptonshire is the biggest single growth area outside London under the Government's Sustainable Communities Plan and the Highways Agency is actively working on the need to find a deliverable solution for improvements to the main highway network, particularly to the A14 and A45. This would allow significant housing and economic growth to come forward as planned by the Joint Planning Unit. The Highways Agency is confident that interim measures such as access controls and narrow lane widening, coupled with modal shift, will enable the housing trajectory set out in the Core Spatial Strategy to be taken forward to the stages when major A14 works will be required and can be delivered. With these interim measures along the A14 corridor it should be possible to provide for a continuity of mixed development between 2006 and 2016. Whether modal shift measures would allow all of the new homes envisaged to be delivered over the period is more conjectural without an agreed delivery programme.

30. I am pleased to note that during the Examination the Wastewater Capacity Study (Document 728) identified a solution to the capacity issues so an important strategic infrastructure barrier to development has been overcome.
31. At the time of the examination no programme of highway funding had been decided. The Department of Transport/Highways Agency will not be reporting to ministers setting out options and proposing possible packages to secure the A14 road improvements until April 2008. Although it is now at the end of April 2008 at the time of writing this report no further information was available. It seems, therefore, that if consideration of these schemes result in a positive decision public consultation on the options is unlikely to take place until the end of the year.
32. Similarly, the North Northants Development Company, following guidance from government, has to submit revised bids for its Programme of Delivery. This is likely to require further agreement between public and private sector stakeholders. There is, therefore, no agreed programme of delivery in place.
33. The Joint Planning Unit has made every effort to produce a credible Core Spatial Strategy and provide updated background information to ensure that it forms a firm basis for further Development Plan Documents. Through no fault of its own it did not, and does not, have all of the information it needs on infrastructure to assess the likelihood and scale of development in the longer term.
34. The government determined that North Northamptonshire is to be a national growth area. This was followed up by the creation of a joint planning unit to prepare the Core Spatial Strategy (CSS), but so far there has been little tangible government financial commitment. Developers and stakeholders are being asked to commit extensive resources over many years to develop Sustainable Urban Extensions without the certainty that their investment will be matched by government funding to ensure that the full infrastructure requirements are met at the appropriate time. Such uncertainty is not conducive to encouraging the massive and essential step change needed to achieve the economic regeneration of North Northamptonshire envisaged in the CSS.
35. Without a highway funding programme in place and with no identified Programme of Delivery, or a Sub Regional Infrastructure Fund containing a financial base for development during the Plan period to guide the North Northants Development Company or the Joint Planning Unit, it is difficult to assess the long term prospects of development taking place as programmed under tests vii, viii and ix.

36. I have considered whether doubt about longer term development taking place requires me to recommend withdrawal of the Core Spatial Strategy as unsound.
37. I conclude that it would certainly not be in the interests of North Northamptonshire, with its need for a formidable step change, to hold back the housing and economic development which can proceed. Moreover, some Sustainable Urban Extensions are in an advanced stage of preparation, with planning applications already submitted, and should be encouraged to commence the growth initiated by the government.
38. An additional factor which leads me to the conclusion that the Core Spatial Strategy (CSS) should be found to be sound is that the appropriate committee has agreed to the commencement of a review of the CSS in 2008, to take into account the expected Regional Spatial Strategy.
39. Proposed Change A6 refers to "appropriate" solutions to infrastructure constraints. I do not believe that for soundness the specific solutions need to be identified in the Core Strategy, only that "appropriate" solutions would need to be found.
40. I do not consider it sound to commit a future review of the Core Spatial Strategy to take a particular action. If reference to such action is deleted there is no need for paragraph three as paragraphs one and two already deal with solutions to infrastructure constraints. Some representors consider that infrastructure providers should be listed in the policy but I do not believe that this is necessary for soundness. As long as new development is supported with the timely delivery of infrastructure the sources of it could be various.
41. I accept that Policy 7 should apply to all development (as was proposed in Change A6). However, to avoid putting the cart before the horse the second sentence of the second paragraph of Policy 7 should be more positively worded. I have therefore recommended revised wording in place of Proposed Change A6. This would be more in the spirit of Planning Policy Statement 12 (2.14) under test iv.
42. Similarly paragraph 3.41 should commence with a positive statement. See my recommendation below.
43. Paragraph 3.47 appears to preclude health, leisure or other needs of the general public from Sustainable Urban Extensions.
44. Concern has been expressed about the lack of availability of the Spatial Investment Strategy referred to in the Core Strategy. I find the SIS to be a misnomer. I would expect a SIS to be a financial document on which the Core Strategy is based, whereas the document is not that. It is a delivery mechanism or Programme

of Development to be prepared by the North Northants Development Company and closely tied to the NNDC bids for funding, funding yet to be agreed.

45. I conclude that the Core Spatial Strategy (CSS) is sound and although there is an absence of information on future infrastructure funding, the circumstances of the Joint Planning Unit (JPU) and constituent local planning authorities are such that the CSS should provide certainty for those developments in the earlier stages of the Plan, and also provide a substantial base for the JPU to review the CSS. This would enable the constituent authorities to proceed to the next stages of the Local Development Framework process.

46. I recommend that the review of the Core Spatial Strategy should cover those matters raised in my report; infrastructure delivery, employment including strategic distribution sites, updating of Figure 12 on the basis of Planning Policy Statement 3 and the Strategic Housing Land Availability Assessment, and the potential for further Sustainable Urban Extensions to address development beyond 2021.

47. In order to make the Core Spatial Strategy sound the following changes should be made.

- a. Paragraph three of Policy 7 should be deleted and Proposed Change D7 is not recommended.**
- b. Delete the second sentence of the second paragraph of Policy 7 and replace with **Planning permission will be granted for development in accordance with phasing in the Core Spatial Strategy, subject to solutions to infrastructure constraints being resolved, or by interim measures or phasing conditions where appropriate.****
- c. Delete the first sentence of **paragraph 3.41** and substitute: **The proposed housing growth will need to be supported by improvements to the physical and social infrastructure.****
- d. As existing references to the Planning Gain Supplement in paragraph 3.55 are now obsolete the paragraph should be deleted and replaced with:**

The government intends to legislate to give planning authorities greater powers to apply planning charges to help fund local and strategic infrastructure

alongside negotiated contributions for site- specific matters. This supports the North Northamptonshire approach, which will be reviewed in the light of any new legislation. This would be in accordance with Proposed Change D6.

- e. Add to the second sentence of paragraph 3.47 "**and other sites** with good public transport accessibility"

Strategic Gaps

- 48. The regional approach to strategic gaps is in dispute and this needs to be clarified. Planning guidance on core strategies states that they should "*indicate the strategic approach to be adopted in relation to open countryside... if relevant but without repeating government policy*" It also explains that a Core Strategy "*should be sufficiently locally distinctive as to do more than simply reflect national and regional guidance. It should add something to show how national advice will be applied to the area having regard to local circumstances.*"
- 49. In my view national advice in Planning Policy Statement No 7 (PPS) does not favour such local designations, unless there are landscape, wildlife or historic qualities, where greater priority should be given to restraint of potentially damaging development. Local planning authorities should conserve special features and sites that are highly valued locally. The government believes that carefully drafted criteria-based policies in Local Development Documents, utilising such tools as landscape character assessment should provide sufficient protection for these areas, without the need for rigid local designations. Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. Any such designations should be based on a robust assessment of *the qualities of the landscape concerned*. From the evidence and my visits I do not consider the strategic gaps as a whole to have clearly identified qualities.
- 50. Once settlements and Sustainable Urban Extensions are clearly defined with development boundaries determined through Master Plans and Development Plan Documents the land in between settlements will be "countryside" and subject to protection on the

basis of national policies in PPS7. Paragraph 3.39 of the Core Strategy makes it clear that Sustainable Urban Extensions have been selected to avoid coalescence between settlements. I do not consider it sound practice to duplicate government policy which already strictly controls development in the countryside by introducing what the Joint Planning Unit accept at paragraph 3.39 is an *additional* safeguard. Yet another layer of policy is unnecessary and fails test iv. It may well be that there are stretches of countryside within Strategic Gaps which, because of their character and importance to green infrastructure, are worthy of particular protection and an integrated approach to landscape management is warranted, but these should be defined on their merits.

51. The alignment of the Sub-Regional Corridor is misleading on Figure 10.

52. In order to make the Core Spatial Strategy sound the following changes are necessary.

a Adjust alignment of Sub-Regional Corridor 5 (Harpers Brook) and A6116 on Figure 10. Proposed Change D3 refers.

b Delete Policy 6 and the supporting text at paragraphs 3.39 and 3.40 and remove Strategic Gap notations from Key Diagram: Figure 15.

c. Add new paragraph before paragraph 3.13

Distinctive and separate settlements will be maintained in North Northamptonshire. The locations of Sustainable Urban Extensions have been selected to avoid coalescence between settlements. Outside these developments and settlement boundaries determined through Master Plans and Development Plan Documents, the countryside will be subject to protection as set out in Policy 10 and on the basis of national policies in Planning Policy Statement 7.

Delivering Economic Prosperity.

53. The Government Office for the East Midlands and the East Midlands Regional Assembly have expressed broad support for the employment strategy, and the Regional Assembly have confirmed conformity between the Core Spatial Strategy and the RSS8 and Draft Regional Spatial Plan under soundness test iv.
54. The North Northamptonshire Land Futures – Final Report by Roger Tym & Partners/Innes England (Document 708) indicated that the Plan area should aim for the greatest achievable growth in the higher-value economic sectors. The study concludes that there is a need to both build on existing strengths and diversify the economy into higher-value sectors.
55. National guidance requires that planning policies should be flexible enough to respond to economic challenges and opportunities, but there is a limit to the extent the Joint Planning Unit (JPU) can predict the future. Many economic markets are at a sub regional level and to plan for these markets I consider it sound for the JPU to work on sub regional assessments, rather than district assessments as suggested by some representors. In my view Policy 12 is flexible enough and sound enough to recognise that sites need to be identified in growth towns to meet the aims of the Technology Realm initiative.
56. The Technology Realm for Northamptonshire (2006) (Document 710) was a study commissioned by Northamptonshire Enterprise Limited (NEL) and partners undertaken by DTZ to assess how the County can use a Technology Realm – innovative property solutions and business innovation services to achieve a step change in jobs growth. The total in CoPELA 2003 (Document 718) of 47,400 jobs is not dissimilar to the Milton Keynes & South Midlands Sub Regional Strategy (Document 203) and forms the basis of the approach to employment in the Core Spatial Strategy. The total of 47,400 jobs is not deemed by the Joint Planning Unit to be a target but an aspiration to which the policy should address itself although the wording of Policy 9 suggests otherwise.
57. The Employment Background paper of the Joint Planning Unit (JPU) indicates that the Regional Assembly used econometric model-based forecasts. These are similar in approach to those used in the Core Spatial Strategy (CSS) to direct sub regional policies. I see no advantage in using an alternative linear extrapolation. I also share the view of the JPU that it is not practical to break district employment targets into targets for

individual settlements and not doing so does not make the CSS unsound on the basis of test vii.

58. Policy 20 of the Draft Regional Plan does not require identification of strategic employment sites in the Core Strategy. Although in theory it might be desirable to identify high quality strategic employment sites at the Core Spatial Strategy (CSS) level I consider it would be impractical to do so. Such sites, whether they are in town centres, or outside, tend to be "one off" projects to meet a particular need or market location. They can only be identified on the basis of detailed local assessment, based on the general criteria on location in the CSS.
59. Although a criteria based policy might be helpful, and one was suggested at the hearing, I do not consider the Core Spatial Strategy is unsound without one. The new policy would not add much to the criteria already contained in the supporting text at paragraphs 3.91 to 3.95 and in criterion c) of Policy 12.
60. Representors consider that the decline in manufacturing jobs will continue. So far the fall in 3400 jobs in four years only represents 2% of Northamptonshire's stock of jobs and according to the regional employment published forecasts of Cambridge Econometrics (Document 729) although employment in manufacturing is expected to decline, this decline is now at a slower rate. In my view short term trends are of little use in determining policy. Also it seems to me that even if there were a faster decline in manufacturing it cannot be assumed that demand for general industrial floor space is only required by the manufacturing sector. More population will mean more jobs in total, but the Joint Planning Unit (JPU) recognises that relative to the total number of jobs in North Northamptonshire, the manufacturing sector will still experience a substantial decline over the Plan period. Only time will tell whether the change in manufacturing will be significant and for this reason the JPU should in its early review of the Core Spatial Strategy carefully monitor the whole direction of the growth area and particularly employment throughout North Northamptonshire.
61. It is consistent with government guidance to make provision for regular employment land studies to assess the need for new employment sites and the merit of retaining particular sites for future employment uses. Attention should be drawn to a standard methodology for converting job numbers into employment land requirements by inserting additional wording in line 13 of paragraph 3.91. (Proposed Change D10 refers)
62. Concern was expressed by representors about the approach to strategic distribution in the Core Spatial Strategy. However, I understand that Roger Tym and Partners used the latest update of the freight forecasts provided by MDS Transmodal for the Department of Transport to assess trends.

63. Paragraph 3.96 of the supporting text accepts that North Northamptonshire's strategic location has made it the centre for the distribution industry. Nevertheless, representors support the vast step change in employment that needs to take place. This step change is based on providing *higher value* development, and as expressed at the public Examination on many occasions by representors, "*more of the same is not enough.*" This can be extended to argue that "reflecting existing market demand is also not enough." The challenge to create jobs is great and although the distribution sector can produce jobs, it is not just the total number of jobs created, the type and quality are also fundamental to the success of the Plan.
64. I agree with representors that existing employment sites are not likely to be of much use for strategic distribution and new sites would need to be found. While recognising the important benefits of a rail connected location in Corby, the East Midlands Strategic Distribution Study (Document 208) stated in respect of its gross regional requirement for new strategic warehousing of 1200ha to 2026, that *about two thirds of all strategic distribution sites would not be able to be rail served.*
65. There is doubt in the Joint Planning Unit that strategic distribution uses would achieve the *quality* employment growth required. However, in my view some defined "warehousing" and distribution sites contain an element of manufacturing and repair and an office component. This can contribute to higher quality employment and often at employment densities greater than manufacturing. It is also important to ensure that North Northamptonshire does not lose out by failing to meet reasonable demand for strategic distribution.
66. New sites are not precluded by Policy 12 but I do find the policy as written to be unduly restrictive in that it infers that only smaller scale distribution would be permitted. New sites may be smaller than Eurohub but they may not be small. I recommend revised wording to meet soundness test ix.
67. Although I consider that in future general locations for strategic distribution sites should be identified in the Core Spatial Strategy (CSS), I do not believe that the *specific* allocations at Wellingborough and Corby proposed by representors, which did not go through the CSS procedure should be included. The scale of these sites, and their potential impact so great, is such that the Joint Planning Unit should have the opportunity to consider the location and scale of distribution sites in North Northamptonshire as a whole.
68. However, because of the specialist nature of the distribution site requirements and the limited number of options for sites within the Plan area, and to meet soundness test iv, I believe these

strategic distribution sites need to be looked at early in the review process.

69. The recent Panel Report on the Regional Spatial Strategy in its recommendation R5.4 (Policy 20A Strategic Distribution) proposes a strategic criteria based policy. Depending upon the wording of a location policy in the review there may or may not be a need for a criteria based policy as well. If there is such a need the criteria should be in the Core Spatial Strategy, the criteria itself cannot be left to subsequent Development Plan Documents.
70. Although it was argued that a criteria based policy is required now, criteria are already listed in paragraph 3.98 based on the East Midlands Strategic Distribution Study, and paragraph 3.99 allows for smaller scale distribution sites to come forward. In my view paragraph 3.91 adopts a reasonably flexible approach providing for some over-allocation to deal with development time lags. In particular Policy 12 c) states that "new sites will be allocated to meet any identified shortfall in supply."
71. I conclude that Policy 12 provides a framework for B1 development in appropriate locations, including through the Technology Realm Initiative, and as amended by me will provide interim guidance on strategic distribution sites. Although Planning Policy Statement 12 indicates that a Core Spatial Strategy (CSS) may identify general locations for strategic development there is no guidance of identified need in the Regional Spatial Strategy. Also with the Strategic Northamptonshire Economic Action Plan and a review of the CSS commencing in 2008 which will include employment strategy, no doubt using updated base figures, I consider the CSS for the time being provides sufficient criteria to direct employment through the Development Plan Documents.
72. As there is no direct link between the scale of job growth and the numbers of new homes I have considered whether the last sentence of paragraph 3.75 should be deleted, or amended. However, regardless of any direct link the purpose of the Core Spatial Strategy is to produce a balanced plan for the growth area and I do not find that the concern about an over-commitment to housing in relation to employment to be unreasonable or unsound. National guidance accepts that where possible land use reviews for housing and employment, should be undertaken at the same time.
73. As Table 4 - Proposed Job Growth - accords with the requirements of the Milton Keynes and South Midlands Sub-Regional Strategy and the East Midlands Spatial Strategy, I do not find it unsound under tests iv and v.
74. I conclude that there is sufficient evidence to point the way of a step change in employment and that with the changes I recommend Tests iv, vi and vii for soundness on Delivering Economic Prosperity have been complied with in the short term

having regard to the longer term uncertainty of infrastructure and a requirement to identify Strategic Distribution sites in the review of the Core Spatial Strategy.

75. In order to make the Core Spatial Strategy sound the following changes are necessary.

- a. Delete **against these targets** from the second sentence of Policy 9.
- b. The second sentence of criterion d) of Policy 12 should be amended by deleting "Sites for smaller scale distribution" and replacing with **Other distribution sites.....**
- c. After ".....employment land/floorspace" in paragraph 3.91 add **The Joint Planning Unit has produced a technical note giving guidance on the methodology to be used when converting job numbers into employment land requirements.** This is in accordance with Proposed Change D10

Delivery of Housing.

76. The delivery of housing is closely linked to Infrastructure, which I have dealt with above. The main issues are; the extent of housing provision, the certainty of that provision, and the effectiveness of the Core Spatial Strategy in identifying sufficient land.
77. It is not the role of the Core Spatial Strategy (CSS) to identify specific sites but to identify broad locations for strategic development. Paragraph 3.18 of the Core Spatial Strategy sets the scene. Identification of these broad locations is in the form of Sustainable Urban Extensions (SUEs) focussing greenfield development on a few large SUEs at the growth towns. These large SUEs provide the opportunity for a mix of homes, jobs and other uses, delivery of infrastructure and services and the provision of a high quality environment. They should not be undermined by the early development of other smaller sites in growth towns.
78. Paragraph 4.8 of the Joint Planning Unit Background Paper 3 explains how any shortfall in supply will be identified through Housing Land Availability Assessment to provide an orderly development of Sustainable Urban Extensions. Paragraph 3.64 is proposed for revision to comply with paragraphs 53 to 57 of Planning Policy Statement 3 (Housing).
79. The housing provision over the Plan period relies as yet on a highway infrastructure which is not programmed. As more than a 5 years supply is identified I can find the housing provision sound under test iv but only in the short term. The Core Spatial Strategy (CSS) must work to the agreed Regional Spatial Strategy, but with a new RSS expected later this year the "early review" of the CSS can proceed without delay.
80. I see no soundness reason to modify Policy 8 to identify a further supply of developable land. The policy provides the mechanism to encourage the initial Sustainable Urban Extensions to build up momentum (Paragraphs 3.68 and 3.69 refer)
81. There was confusion about what was included in Table 5. For soundness and clarity add a footnote to the table
82. It is stated in paragraph 59 of Planning Policy Statement 3 that windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent *specific sites* being identified. In these circumstances, an allowance should be included but be realistic having regard to the Strategic Housing Land Availability Assessment, historic delivery rates and expected future trends.

83. I do not find the guidance in PPS3 particularly helpful in respect of this Core Spatial Strategy (CSS) because of the interpretation by the Joint Planning Unit of guidance in PPS12. When the CSS was prepared only general locations for housing were identified, leaving *specific sites* to be identified later in subsequent Development Plan Documents. North Northamptonshire has been identified as a discrete Housing Market Area and a Strategic Housing Market Assessment has been completed. I understand that in future the districts will produce their own Annual Monitoring Reports (AMR) and the Joint Planning Unit intend to produce a joint AMR.
84. Figure 12 has been updated on the basis of Corby Urban Capacity Study resulting in Proposed Change A1. This reduces the shortfall to 2021 to 21,530 dwellings. However, it seems to me that Figure 12 only includes a small windfall element based on historic trends, about 5% of total supply, and should be considered realistic unless the Strategic Housing Land Availability Assessment proves it to be otherwise. It is accepted by the Joint Planning Unit that Figure 12 will require updating on the basis of PPS3 and its guidance on the preparation of the Housing Land Availability Assessment. This work is underway. Piecemeal updating at this stage would not add to the soundness of the Core Spatial Strategy, as at present, with proposed changes, consistent data for the 4 districts is shown.
85. Table 3 gives trajectories for each district based on 5 year averages. The totals are the same as the Regional Spatial Strategy (RSS). The Core Strategy figures differ from those in the RSS because of under provision during early years and an analysis of committed and potential housing sites. The Core Strategy is more accurate and was accepted by East Midlands Regional Assembly. It is not necessary for soundness to provide annual figures in a Core Strategy.
86. The Joint Planning Unit has clearly demonstrated that greenfield sites will need to be developed to obtain the step change required and only some 65% of new development can take place in the growth towns. This is recognised in paragraphs 3.82 and 3.83 of the Core Spatial Strategy.
87. I consider it sound under Proposed Changes A2 and A3 to include the definition of "North East" Corby in the Core Spatial Strategy. It gives flexibility for the Local Planning Authority to consider the merits of assessing whether the Sustainable Urban Extension could expand the development of Priors Hall, with the potential to deliver housing post 2021. Regardless of the provisions of the adopted Corby Borough Local Plan the proposed change is supported by Corby Borough Council. I do not find the changes in conflict with the urban extensions study or the Preferred Options Study.

88. Neither of the Proposed Changes A2 or A3 accepts the scale of development currently proposed by developers on land east of Weldon. The changes would merely give the local planning authority the flexibility to consider the merits of not limiting future development to the north east of Corby to Priors Hall. I accept that the changes would conflict with soundness test iv in so far that they would not accord with the Corby Borough Local Plan. However, it is for the Core Spatial Strategy to set future spatial strategy by updating existing plans. In determining the future expansion of Priors Hall the planning authority would need to ensure that relevant tests of soundness would be met.
89. I consider the Core Spatial Strategy must work to the agreed Regional Spatial Strategy to give certainty to 2021 and in my view the recent Panel Report does not materially change the approach to North Northamptonshire.
90. Flexibility for Sustainable Urban Extensions to expand beyond 2021 to meet 15 year supply is contained in paragraphs 1.22 and 3.67 of the Core Strategy and paragraph 3.64 will be revised by Proposed Change D8 to be consistent with paragraphs 53 to 57 of PPS3 under soundness test iv.
91. To be consistent with Proposed Change A1 the shortfall referred to in the first sentence of paragraph 3.66 should read 21,500 instead of 23,000.
92. Proposed Change A11 of amended criterion b) in Policy 16 would reflect more clearly Planning Policy Statement 3. This states that targets, rather than quotas, should be identified, and that there should be a degree of flexibility including viability. I consider affordable housing being *sought* to a target is sound as provision is by negotiation depending on the characteristics of a site.
93. I accept that the Joint Planning Unit should use up to date information for its policies if that information is now to hand. To my mind the new figure of a 30% target in affordable housing for Corby is not unduly onerous. It is a *target* and is based on the latest Strategic Housing Market Assessment.
94. Although it has been argued that Figure 12 – Sources of Housing 2000-2021 should contain district totals of sources of existing housing land supply and a shortfall for each district identified I do not consider that Figure 12 can be looked at in isolation. Other Figures and Tables provide details of housing provision rates and the Strategic Market Housing Assessment, as required by PPS3, will inform each district. Figure 5 in particular already describes a breakdown of population and job growth for the Plan period. As local planning authorities have yet to complete a reassessment of local plan allocations for their Development Plan Documents I believe that at present Figure 12, which will be

updated, can only provide a North Northamptonshire guide to sources of housing, until this can be refined at the local level.

95. As required by Planning Policy Statement 3 the Joint Planning Unit (JPU) has identified those strategic sites that are critical to the delivery of the housing strategy over the Plan period in each district. As Development Plan Documents are prepared information for each district will evolve, enabling the JPU to incorporate more detailed figures at the review.

96. I am concerned about the Proposed Change B23 to Figure 13 footnote 9 as it makes the assumption that the impact of the new distributor road to serve a larger number than 4200 dwellings could be satisfactorily accommodated without a damaging impact on Boughton House. From the evidence at the hearing I do not consider it sound to assume this without further assessment. Proposed Change B23 is not recommended.

97. I consider that for soundness and clarification and to avoid delay in bringing forward Sustainable Urban Extensions it should be stated in paragraph 3.68 that as the Core Spatial Strategy already identifies their locations the alternative to Development Plan Documents of a Master Plan approach would be acceptable. This would be in accordance with Proposed Change C23 and reflects current practice within North Northamptonshire.

98. Under guidance in Planning Policy Statement 3 local planning authorities should take into account risks to delivery by drawing on informed assessments. As the proposed change by the Joint Planning Unit is based on a recently completed Housing Market Assessment which clarifies why targets vary, I consider the additional wording to paragraph 4.23 of the supporting text to be necessary to make the Core Spatial Strategy sound. Proposed Change B26 refers

99. **In order to make the Core Spatial Strategy sound the following changes are necessary to meet Tests iv and Test vi to ix.**

a. Paragraph 4.26 needs revision as follows: **Policy 10 identifies the broad location of Sustainable Urban Extensions at the Growth Towns.** Smaller Sustainable Urban Extensions will be brought forward at the smaller towns.....Raunds. **Policy 17 applies to all of these Sustainable Urban Extensions which** will offer.....for all. I do not consider it necessary for soundness to include Proposed Change D11. I have dealt with this under Sustainable Urban Extensions below. (Proposed Change C35 refers)

b. Add as a footnote to Table 5 **"The Corby rural housing figure of 1290 dwellings includes a development of**

970 dwellings under construction to the west of Stanion.” (Proposed Change D1 refers.)

- c. The final sentence of paragraph 3.64 should be amended as follows: **“These plans will identify sources of housing to enable continuous delivery for at least 15 years from the date of adoption. The local planning authorities should each maintain at least a 5 year housing land supply of deliverable sites for their area. In addition, Policy 8 seeks to ensure a 5 year supply for the North Northamptonshire area as a whole, enabling delivery to be co-ordinated across the Housing Market Area.** (Proposed Change D8 refers).
- d. The first sentence of paragraph 3.66 should read **21,500** instead of 23,000.
- e. Affordable housing being **sought** to a target is sound as provision is by negotiation depending on the characteristics of a site. I recommend the wording of Proposed Change A11.
- f. Amend paragraph 3.68 as follows: **“their precise scale and phasing to be determined through a Development Plan Document prepared by the districts, or through a master planning approach in planning applications.**
- g. Proposed Change B22 to the end of paragraph 3.64 is necessary for soundness. It states **The housing data presented in Figure 12 will be reviewed and monitored through a joint Housing Land Availability Assessment in line with guidance in PPS3. This work will inform district Development Plan Documents and a review of this plan.** The words “and brownfield strategies” should not be included as this is only one of a number of matters that would be considered in a Development Plan Document.
- h. Proposed Change B23 should not be made.
- i. Add the additional following wording to paragraph 4.23 of the supporting text. **The affordable housing targets set out in Policy 16 reflect differing levels of need between districts and the fact that some sites are unlikely to make a significant contribution to the supply of affordable housing.** (Proposed Change B26 refers)

Transport

100. Although there are weaknesses in transport provision brought about by matters not under the control of the Joint Planning Unit, and as yet an unspecified highways programme, the Core Spatial Strategy otherwise would promote more sustainable transport choices. This would be by encouraging accessibility to everyday destinations by public transport, walking and cycling and reducing the need to travel. To ensure soundness under test vi and be consistent with the approved strategy for growth amend the final bullet point in Policy 2.

101. In order to make the Core Spatial Strategy sound the following changes are necessary.

- a. Insert at line 7 in place of sentence starting "Policy 2 sets out the..... **Policy 2 includes those schemes identified in the County Council's Transport Strategy for Growth that would contribute to North Northamptonshire's strategic connectivity**" (Proposed Change D4 refers).
- b. Replace "dualling" with **improvement** in respect of A43 (Proposed Change D5 refers).

Distribution of Development

102. There is no identified need in the Regional Spatial Strategy or the Core Spatial Strategy (CSS) evidence base for a regionally significant employment site and the spatial strategy of the CSS reflects this in that it does not support a single strategic office site.
103. The focus of development in the growth towns must be concentrated on the main Sustainable Urban Extensions (SUEs) to ensure the necessary infrastructure and investment. To allow further residential development of any significant scale outside the SUEs in the growth towns would detract from the certainty provided by the strategy. I, therefore, do not consider it would be sound to include growth towns in the last line of Policy 10. However, as I have concluded above, paragraph 4.26 should be clarified on the basis of Change C35 to be consistent.
104. Table 5 reflects the spatial approach of Regional Spatial Strategy 8 - Milton Keynes/South Midlands which requires a focus on the growth towns but also accepts some growth in the smaller towns and rural service centres. I do not find this unsound. However, for clarification a footnote will be added to explain that the Corby rural housing figure is inflated because of the 970 dwellings under construction at Stanion. (Proposed Change D1 refers)
105. Although the Local Education Authority has apparently revised its assessment in respect of school capacity at Burton Latimer, and 200 additional dwellings could be accommodated in the town, I find the Joint Planning Unit approach to encourage development in Kettering more sustainable and sound than increasing development in Burton Latimer. I do not recommend a change.
106. I consider that Policy 5 and the criteria in Policies 14 and 17 adequately cover sport, recreation and open space at the strategic level and that forthcoming Development Plan Documents will identify needs and any deficiency.
- 107. I conclude that this section of the Core Spatial Strategy meets tests of soundness iv, vi, vii, viii and ix**

Building Sustainable Communities

108. Policy 14 involves some repetition, but it brings together a check list of key issues from various sources to inform developers and others of sustainable development principles to ensure the delivery of high quality development. It will be used to inform subsequent Development Plan Documents and its inclusion in the Core Spatial Strategy has resulted in an amendment to the North Northamptonshire Local Development Scheme to delete a proposed Development Control DPD. The representations made related to the need for the policy rather than its soundness.

109. In order to make the Core Spatial Strategy sound under tests iv and vii the following changes are required to Policy 14.

- a. Add to criterion b) “Seek to design out **antisocial behaviour**, crime and reduce fear of crime **by applying the principles of the Secured Design scheme:**” (Proposed Change C45)
- b. Add to the end of criterion f) **or that the facility is being relocated and improved to meet the needs of the new and existing community:** (Proposed Change C29)
- c. Add to end of criterion m) **including where possible the re-use of existing structures and materials;** (Proposed Change C30)
- d. Add to criterion o) “Conserve and enhance the landscape character, historic landscape **designated built environmental assets and their settings**, and biodiversity of the environment making reference to the Environmental Character Assessment **and Green Infrastructure Strategy;** (Proposed Changes C31 and C32)
- e. Add to criterion q) “ Not cause a risk to **(and where possible enhance)** the quality of the underlying ground water or surface water, or increase the risk of flooding o the site or elsewhere, and where possible **incorporate Sustainable Drainage Systems (SuDS)** will lead to a reduction in flood risk.” (Proposed Change 34)

Addressing Climate Change

110. There were a number of representations about the soundness of the section on addressing climate change. This was understandable. Since the Core Spatial Strategy (CSS) was prepared there has been much updated advice from government. Such updated advice will be included in the CSS resulting in a rewritten Policy 15 and revisions to supporting text. These will be amended through Proposed Changes A7, A8, A10 and B24.
111. With national guidance and policies of the Regional Spatial Strategy to direct stand alone energy development the Joint Planning Unit did not consider that it could add anything further in the Core Spatial Strategy (CSS). As repetition of national and regional guidance is not required in the CSS I do not consider this approach to be unsound.
112. Criterion b) of Policy 15 requires that residential units which are delivered between 2008 – 2012 meet the Code for Sustainable Homes whereas national guidance advises a starting year of 2010 I do not find this 2 year difference makes the criterion unsound. There is not likely to be much development before 2010 on developments of 200 plus dwellings to which Policy 15 would apply (Proposed Change A10 refers) but with the size of the Sustainable Urban Extensions which are to be comprehensively planned through Master Plans I do not find it unreasonable to expect the development as a whole to comply with the new standard. English Partnerships and the Housing Corporation have already adopted level 3 of the code. Because viability is an important issue the opening sentence to the policy states "Development should meet the highest *viable* standards....." Flexibility based on viability is already an element of the policy and does not need to be further changed for soundness under test ix.
113. Planning Policy Statement 22 encourages local planning authorities and developers to incorporate renewable energy projects in all new development. Building a Green Future (Document 129) - highlights that progression towards "zero carbon" homes means that householders will need to provide zero or low carbon sources of electricity supply. This is currently outside of the scope of the Building Regulations. In my view it is important in any policy to ensure that there are no gaps which might leave effective carbon reduction solutions untapped.
114. However, I am concerned about the requirement in criterion iii) that at least 30% of the demand for energy be met on site. I am not satisfied that under test ix there is a sufficient evidence base to include a rigid figure of 30% in Policy 15 as being consistent with the Code for Sustainable Homes (CSH). The figure could be aspirational. Also the Joint Planning Unit in paragraph 4.24 of its Response to Further Written Statements in respect of matters to be considered at Hearing Session 20, has stated in the

first sentence: "In relation to whether the 30% *target* is inconsistent with the CSH." This acceptance that the 30% is a target is not reflected in Policy 15 (iii) which clearly states "*at least 30%* of the demand for energy will be met on site ...etc"

115. In order to make the Core Spatial Strategy sound the following changes are necessary.

- a. Reword iii in Policy 15 to: **a target of at least 30% of the demand for energy will be met on site (the actual figure to depend upon technical and economic viability), and.....**Together with footnote 3 this would provide a greater degree of flexibility under test ix until such time as the North Northamptonshire Energy Strategy addresses the issue further in the forthcoming early review of the Core Spatial Strategy.

Sustainable Housing Provision.

116. Planning Policy Statement 3 paragraph 29 states that in Development Plan Documents overall targets should be set for the amount of affordable housing to be provided and this target should reflect the new definition of social rented and intermediate households. The target should also reflect an assessment of the likely economic viability of land for housing within the area, taking into account the risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing.

117. Although Policy 16 of the Core Spatial Strategy does not differentiate between social rented and intermediate housing within North Northamptonshire I do not consider the Policy unsound because of this exclusion. It would be more appropriate for the split between the type of affordable housing required to meet the needs in a particular area to be dealt with by the local planning authorities and housing authorities in subsequent Development Plan Documents.

118. I understand that for the purposes of the Proposed Changes suggested the Strategic Housing Market Assessment (SHMA) Compact Report (August 2007) is the definitive document. This document recommends the strategic district wide affordable housing targets as follows:

Corby	30%
Kettering	30%
Wellingborough	30%
East Northamptonshire	40%

119. I accept that the above Housing Market Assessment is a major study prepared by leading consultants. Quantitative data analysis included returns from almost 10,000 households. The study was overseen by a Steering Group. This comprised the District Councils, County Council, Joint Planning Unit, East Midlands Regional Assembly, and the Housing Corporation. I understand it followed government guidance and also involved the Fordham Research Balanced Housing Market model.
120. Levels of affordable housing provision in the first five years of the Plan have been low, averaging just below 10% of the total provision, with none in Corby.
121. The Housing Market Assessment (HMA) uses the Community and Local Government Needs model to quantify the overall scale of challenge. This identified a net annual need for 1344 affordable dwellings which equates to 46% of total housing provision. This level of provision would meet existing as well as newly arising needs. Fordham Research believes that the Communities and Local Government Needs model represents the ideal state of affairs that is a long way from being met anywhere in the country. Because of this the HMA uses a Balanced Housing Market model which it considers to be a more practical tool. It takes into account housing expectations and financial capacity in existing and incoming households. The Balanced Housing Market model identified a need for 603 affordable homes, which equates to 21% of the outstanding housing requirement.
122. Concern was expressed during examination about the difference between the 21% outstanding housing requirement and the figures in Policy 16 of 30% and 40%. I accept that these targets have not been justified on the basis of the Fordham study itself. However, the Joint Planning Unit has taken the view that to deliver affordable housing at 21% level over the whole of North Northamptonshire, it will be necessary to achieve in excess of 30% affordable housing provision on outstanding sites that are not yet committed.
123. Although it may seem somewhat unfair to burden those sites as yet without planning permission with a higher target of affordable housing I do not find the percentage targets unreasonably high, as long as there is the safeguard that such targets meet viability criteria in respect of individual sites. There will be many burdens on developers bringing forward Sustainable Urban Extensions for mixed development, of which affordable housing is only one, albeit an important one.
124. It is accepted in paragraph 29 of Planning Policy Statement 3 that where it can be robustly justified, off site contribution or a

financial contribution in lieu of on site provision may be accepted, as long as the agreed approach contributes to the creation of mixed communities in the local authority area. Because of the character of parts of North Northamptonshire where it is more likely that finance will be required to regenerate existing housing as part of a package, this off site approach should be recognised for soundness under test ix in the supporting text.

125. In order to make the Core Spatial Strategy sound the following changes are necessary.

- a. Add to paragraph 4.23

Because of the character of parts of North Northamptonshire where urban regeneration is required, and in accordance with paragraph 29 of Planning Policy Statement 3, off site provision or a financial contribution towards affordable housing may be a robust way of securing the creation of mixed communities.

Sustainable Urban Extensions

126. I have stated above that the Sustainable Urban Extensions (SUEs) in the growth towns should be given priority and should not be undermined by smaller SUEs, and all SUEs regardless of size should comply with the criteria listed in the policy. SUEs should also be of a scale and mix to ensure they are not add-on dormitory areas. Following discussion at the hearing the Joint Planning Unit suggested adding to paragraph 4.26 a sentence to the effect "In assessing the applicability of criteria in Policy 17, account will be taken of the scale of the SUE and the accessibility and adequacy of facilities and services in the adjoining urban area." I do not consider this to be necessary for soundness. The opening sentence of Policy 17 makes it clear that Master Plans will be produced for all SUEs and should *make provision for.....* Master Plans cannot be drawn up in isolation from the surrounding urban area and if there were underused facilities in the area these would be identified in the Master Plan.

127. Although concern was expressed about criterion b of Policy 17 that a minimum overall density of 35 dwellings per hectare be adopted, this density follows the policy approach in the 2001 County Structure Plan. It is not unreasonably high and according to the evidence is around the figure shown in the Sustainable Urban Extension schemes submitted for planning permission. I do not find the inclusion of criterion b, which is intended to make best use of greenfield sites, to be unsound.

128. **In order to ensure the Core Spatial Strategy is sound Proposed Change D11 should not be made.**

Gypsies and Travellers

129. Once the North Northamptonshire Gypsy Needs Assessment is completed using the criteria in Policy 18 individual districts will allocate specific sites. Although Sustainable Urban Extensions are the largest areas of open land scheduled for development during the Plan period in my view it adds nothing to the soundness of the Plan to refer to them specifically in relation to gypsy sites in paragraph 4.32. I consider Policy 18 with its reference to criteria in Policies 10 and 14 would not unduly restrict the choice of sites for gypsies.
130. **In order to make the Core Spatial Strategy sound the last sentence of paragraph 4.32 should be deleted.**

Monitoring and Review

131. The concern about soundness was directed towards whether the criteria would be robust enough to monitor the step change in housing and employment.
132. In my view Section 5 seeks to establish indicators and strategic targets, but the Core Spatial Strategy (CSS) policy can only be a part of the monitoring process as the districts would need to monitor specific local issues in more detail. The CSS reflects the requirements of the 'Local Development Framework Core Output Indicators' – which provides guidance on those indicators local authorities are required to monitor, including Business Development, Housing and Transport. A strategic Monitoring Framework has been set out incorporating core output indicators set out in national guidance and also other indicators to deal with local circumstances.
133. A North Northamptonshire monitoring group has been set up facilitated by the County Council which already oversees the production of the Milton Keynes South Midlands Annual Monitoring Report. The Joint Planning Unit (JPU) in conjunction with the County Council has invested in "CDP Smart" – a purpose built analysis and report software tool designed for North Northamptonshire, which would enable the JPU and local authorities to monitor, housing, employment, environment and transport as

well as more specific local needs. The JPU will produce an Annual Monitoring Report from 2008 onwards.

134. It seems to me that the framework and mechanisms are sufficient to monitor the delivery of key infrastructure. I am, however, concerned that the Programme of Development to be prepared by the North Northants Development Company based on bids to government, which was expected to be available early in 2008, has not materialised and I have no indication now when it is likely to be available. This lack of an agreed programme with its financial backing is one of the reasons I am concerned about the difficulties of monitoring progress.
135. I believe that housing would be reasonably easy to monitor against the housing trajectory set out in Figure 11. The proposed addition to paragraph 3.64 emphasises that the individual districts need to maintain a 5 year supply of deliverable housing. In the event of a material deficit, the districts would be able to bring forward alternative or additional sites through their Local Plan Documents, or through the Master Plan development control process.
136. The Joint Planning Unit (JPU) recognises that the annual monitoring of employment is fundamental to the Core Strategy. The Milton Keynes South Midlands Strategy indicates that the employment figures should be used for monitoring purposes. I consider the performance indicators would enable the JPU and the districts to assess whether the economic strategy is being delivered. However, there is likely to be a time lag between the delivery of homes and the creation of new jobs. The step change will have to gather momentum.
137. Representors consider that for soundness there should be a trigger mechanism built into the monitoring process to enable alternative employment sites to be brought forward. I am not sure how this would work. Strategic employment sites are not specifically defined and although I have stated earlier in this report that the location of Strategic Distribution sites should be identified by the Joint Planning Unit to enable effective comparisons to be made, I am not convinced how a trigger mechanism could effectively operate without an agreed Programme of Delivery, or a Sub Regional Infrastructure Fund.
138. I asked the question about the future role of the Joint Planning Unit at the hearing because it seems to me that its continuation of function is the present way of ensuring a co-ordinated approach to the delivery by the constituent authorities in North Northamptonshire. This collective approach is essential and there should be a mechanism to ensure a definitive functional coherence between authorities. As the North Northants Development Company has the task of driving, co-ordinating and managing growth a clear marketing strategy will be required, but I

do not consider the details of this are matters that could be set out in the Core Spatial Strategy.

139. Following discussion at a session of the public examination a technical note on the translation of job numbers into land requirements was prepared and agreed between the districts/boroughs and with the representors who raised the issue. (Document 922)

140. I consider that Performance Indicators and Targets would be sound under test viii, but it will be the implementation of the monitoring process which ensures its success.

141. In order to make the Core Spatial Strategy sound as I have recommended the deletion of Policy 6 in respect of Strategic Gaps from the Core Strategy reference to its monitoring in Table 7 should also be deleted.

Overall Conclusion

142. I have found the Core Spatial Strategy sound in accordance with the "procedural tests" (i-iii) and conformity test (v). However, in my report above I have identified a failure to provide a firm long term infrastructure foundation. Through an early review a mechanism needs to be found to ensure that the necessary infrastructure is put in place to give certainty to the housing and employment provision.

143. I have also found the Core Spatial Strategy deficient in relation to the requirements of Regulation 13 (5) but this can be easily rectified by the addition of Appendix 2

144. Subject to the necessary changes which I have identified above throughout my report the Joint Planning Unit North Northamptonshire Core Spatial Strategy is sound in terms of the requirements of the Act and its associated regulations.