



**Neighbourhood Planning**

Submitted to  
Desborough Town Council

July 2018

Submitted by  
AECOM  
Aldgate Tower  
London

# Evidence Base and Policy Review for Desborough Town Council

Final Report  
July 2018

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<i>Project Role</i>	<i>Name</i>	<i>Position</i>	<i>Actions Summary</i>	<i>Signature</i>	<i>Date</i>
<b>Researcher(s)</b>	Chris Wiseman	Senior Designer	Research and drafting	CW	20/01/18
	Ruth Mauritzen	Associate Director	Review	RM	20/01/18
	Julia Laver	Senior Consultant	Research and drafting	LJ	20/01/18
	Jesse Honey	Associate Director	Review	JH	20/01/18
	Lachlan Anderson-Frank	Assistant Consultant	Research and drafting	LAF	20/01/18
	Ivan Tennant	Principal Planner	Review	IT	30/01/18
<b>Director/QA</b>	Stuart Woodin	Technical Director	Review	SW	15/03/18
<b>Qualifying Body</b>	Laura Alvarez (Lathams Architects)		Review on behalf of the community	LA	09/04/18

## Glossary

MHCLG	Department for Communities and Local Government
DPD	Development Plan Document
EBPR	Evidence Base and Policy Review
KBC	Kettering Borough Council
LEP	Local Enterprise Partnership
LSOA	Lower Super Output Area
MSOA	Middle Super Output Area
MHCLG	Ministry of Housing, Communities and Local Government
NCC	Northamptonshire County Council
NNJCS	North Northamptonshire Joint Core Strategy
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PPG	Planning Practice Guidance
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document

# Table of Contents

<b>1 Introduction</b> .....	<b>1-1</b>
1.2 The planning context applicable to Desborough.....	1-1
1.3 Evidence base.....	1-2
<b>2 Methodology</b> .....	<b>2-4</b>
2.1 Evidence review (see table, Appendix 2).....	2-4
2.2 Policy review (see table, Appendix 2).....	2-4
2.3 Policy wording .....	2-4
2.4 Appendix 2 Explanation.....	2-5
<b>3 Conclusions and Recommendations</b> .....	<b>3-7</b>
3.1 General Findings .....	3-7
3.2 Policy/topic specific findings .....	3-7
<b>4 Recommendations for next steps</b> .....	<b>4-10</b>
Appendix 1: Further guidance on Neighbourhood Policy Planning .....	4-11
Appendix 2: Detailed Evidence and Policy Review .....	4-12
Appendix 3: Desborough Neighbourhood Area.....	4-34

# 1 Introduction

1.1.1 The 2011 Localism Act introduced Neighbourhood Planning, allowing parishes or neighbourhood forums across England to develop and adopt legally binding development plans for their neighbourhood area.

1.1.2 Desborough Town Council (referred to as the DTC throughout this report) is in the process of preparing a Neighbourhood Plan for the town of Desborough. The Neighbourhood Area (see Appendix 3) and DTC as the qualifying body were designated by Kettering Borough Council (KBC) in October 2013.

1.1.3 During the inception call the following key issues and concerns arose:

- The NDP is in part motivated by the fact that the majority of shops are property of Co-op; this provokes the perception they have a monopoly. In respect of the key Lawrence site, DTC want to bring in smaller units so as to introduce more competition. They are however concerned that KBC will use this site for residential development, in particular Affordable Housing (AH), while the vision of the DTC is a more mixed use approach;
- A lot of development planned for edge of town; DTC are concerned new people moving in won't use the town centre. In its current state it is not considered attractive, and is losing critical mass. DTC sees the town centre is key to the future of the town; its decline has left a lot of disused brown field sites; and
- The group are particularly concerned about site 11; this is the recreation site and represents a highly valued green space. Northamptonshire County Council (NCC) are seeking to develop this site. DTC question its suitability for development on the basis of access: the main pedestrian access from the town centre through the Damms (marked 3 in orange to denote 'historically and visually important Local Green Space' in Fig 2 of the NDP). A Planning application was however brought forward by Northamptonshire County Council (NCC); this provoked a strong reaction from the community. DTC are seeking to identify sufficient alternative sites to absorb demand and have site 11 designated as a protected green space under para 77 of the NPPF, however NCC insists on development in this area.

1.1.4 Where appropriate, the EBPR has sought to take these factors into consideration when carrying out the review.

## 1.2 The planning context applicable to Desborough

1.2.1 The North Northamptonshire Joint Core Strategy (NNJCS) adopted 14<sup>th</sup> July 2016, guides development within the Kettering Borough.

1.2.2 It is also worth noting that KBC is in the process of producing another Local Plan, at the time of writing referred to on the council website as 'Site Specific Part 2 Local Plan' that 'will cover the whole of Kettering Borough with the exception of issues addressed in the North Northamptonshire Joint Core Strategy.' The document 'will explore the allocation of land for housing, employment, retail, leisure and community facilities and will contain policies relating to specific areas such as Rothwell, Desborough and Burton Latimer towns centres

and topics such as protection of the open countryside and protection of environmental assets.<sup>1</sup> As such it is important moving forward for the Desborough Neighbourhood Plan to monitor the development of this emerging Plan given that, once adopted, its policies will take precedence over those of the NDP, assuming its adoption takes place after the DNP is 'made'.

- 1.2.3 Supplementary Planning Documents (SPDs) also form part of the Local Development Plan. They may cover a range of issues (thematic or site specific) which provide further details to policies in Development Plan Documents (DPD). SPDs that provide guidance to the NNJCS and may be useful to Desborough Neighbourhood Plan include the Open Space and Sustainable Design, and may be referenced as appropriate.
- 1.2.4 Note also the Government's National Planning Policy Framework (NPPF) which was published in 2012 forms a material consideration for the purposes of planning in England. Despite the NNJCS being more recent this document should be in conformity with it; therefore, where the NNJCS conflicts with it, or includes policies on which the NNJCS is silent, then the NPPF approach should take priority.
- 1.2.5 The draft Neighbourhood Plan will be examined independently, and if there is a 'Yes' vote at the subsequent referendum, will be 'made', and form an integral part of the above suite of Local Plan documents. Any subsequent application for planning permission will then be determined in accordance with the policies within the Neighbourhood Plan and the above mentioned documents.
- 1.2.6 This is the main reason the Neighbourhood Plan needs to conform with the Local Plan's 'strategic' (e.g. overarching) policies – to avoid confusion, mixed messages and difficulty of implementation by Planning Officers and committees. Not all policies in the Local Plan will be strategic however and it will be the job of an examiner of your Neighbourhood Plan to determine the degree, if any, of conflict between the draft Neighbourhood Plan policy or development proposal and the strategic policies in the Local Plan. For the purposes of an evidence base and policy review (EBPR), the more a policy departs from or goes beyond the Local Plan (e.g. in terms of standards), the more evidence is required in justification.

### **1.3 Evidence base**

- 1.3.1 The evidence base for neighbourhood planning needs to be 'proportionate' i.e. in relation to the scope of what is being proposed. In line with this approach, the Government's Planning Practice Guidance (PPG) expects most evidence in neighbourhood planning to be 'secondary' (i.e. already collected by another party). Any evidence used should be clearly referenced and presented in an accessible way to justify policies, both for the purpose of examination and for the benefit of residents reading a plan as well as interested parties such as landowners and developers – all of whom may be impacted.
- 1.3.2 Evidence can come from several sources, including:
  - The adopted or emerging Local Plan (from a policy conformity perspective);

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<sup>1</sup> [http://www.kettering.gov.uk/site/scripts/documents\\_info.php?categoryID=494&documentID=1409](http://www.kettering.gov.uk/site/scripts/documents_info.php?categoryID=494&documentID=1409) (visited 30/01/18)

- Local Plan evidence base studies that inform policy documents (e.g. the Strategic Housing Land Availability Assessment or equivalent, Employment Land Review);
- Technical primary evidence generated or commissioned by the Town Council itself (e.g. flood risk assessment, housing needs assessment);
- Stakeholder-derived primary evidence generated or commissioned by the Town Council or Neighbourhood Group (e.g. a survey of local households and businesses); and
- Relevant national reports, studies and data such as from the 2011 Census.

## 2 Methodology

### 2.1 Evidence review (see table, Appendix 2)

2.1.1 AECOM's evidence review focuses on three lines of enquiry:

1. Evidence understanding which summarises what assessors thinks the policy intent is and follows on from the inception call with the group.
2. **Evidence assembly** which covers basic checks including:
  - Whether your evidence has been gathered from verifiable and reputable sources;
  - Whether any third party comments have been taken into account (e.g. from developers, landowners, statutory bodies); and
  - Whether there are any gaps and obvious sources not referred to (e.g. Local Plan background studies).
3. **Evidence analysis**, which considers whether the evidence referred to has been appropriately understood, analysed and reasonable conclusions reached in drawing up policy. A distinction is made between stakeholder derived (e.g. from local household or business surveys) and technical evidence in terms of how well the evidence was analysed, although both are treated as equally important. This stage of the review also considers:
  - Whether evidence is, on balance, proportionate and
  - Whether the evidence has already had a degree of external scrutiny (e.g. from the Local Planning Authority, LPA) in which case such comments are considered.

### 2.2 Policy review (see table, Appendix 2)

2.2.1 After examining the evidence that underpins each policy, the review considers the following questions in terms of meeting the basic conditions<sup>2</sup> of a neighbourhood plan:

- Is the policy spatial in nature and therefore within the scope of a development plan or is it supporting a community project?
- Can the policy be implemented by planning officers (within planning legislation) when deliberating on planning applications?
- Does the policy have due regard to national policy and national guidance including human rights law?
- Is the policy in strategic conformity with the adopted local plan policy? Does it add value to local plan policy, rather than reiterate policy principles?
- Is policy clearly written and easy to understand?

### 2.3 Policy wording

2.3.1 Planning practice guidance states:

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<sup>2</sup> For further information on the basic conditions, please see 'How to write a basic conditions statement available' here: <https://mycommunity.org.uk/wp-content/uploads/2016/08/How-to-write-a-basic-conditions-statement.pdf>

*“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”<sup>3</sup>*

- 2.3.2 The scope and resources available for an EBPR do not normally allow for detailed advice on policy wording. Precise wording of policies is, broadly speaking, considered a matter more for the Town Council or neighbourhood group itself, based not only on the conclusions and recommendations of this report, but also taking into account feedback from other relevant stakeholders, including the LPA.
- 2.3.3 Nevertheless, in cases where minor changes to policy wording may have the effect of increasing soundness and robustness, we have set out any changes we recommend (which, as with all our conclusions and recommendations, comprise non-binding advice).
- 2.3.4 Where significant re-drafting of policy wording is required we have sign-posted useful toolkits and examiners comments. See Appendix 1.
- 2.3.5 We have undertaken a review of the evidence available to support the draft policies emerging in the documentation sent to AECOM by the DTC. From this, we have identified any gaps within the evidence base that has been gathered to date by the Town Council and also provided comment on future work or actions needed to ensure a robust policy approach.

## 2.4 Appendix 2 Explanation

- 2.4.1 Appendix 2 is our detailed review of each policy using the methodology described above which considers the draft policies alongside the policies of the adopted Local Plan, relevant evidence base documents and the NPPF. It aims to provide an answer to the questions raised above. Recommendations are provided in terms of actions the Parish should take in terms of further evidence gathering and/or policy development.
- 2.4.2 The column headings of the Appendix 2 table can be explained as follows:
- **Policy name, number and theme:** The policy name and number as it appears in the Draft Plan. Wherever possible, policies are grouped into themes;
  - **Policy intent:** This column summarises AECOM's understanding of the policy intent;
  - **Evidence source and type:** This column identifies and checks the source of evidence and whether it is technical evidence or based on local surveys and engagement;
  - **Evidence analysis:** This column analysis whether the evidence has been appropriately analysed, understood and reasonable conclusions drawn;

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<sup>3</sup> PPG ref ID 41-041-20140306

- **Proportionality and gaps:** This column indicates, in AECOM's view, whether the evidence is proportionate and where further potentially useful evidence in support of the policy, theme or objective can be found and referenced;
- **Effectiveness of the policy:** This column analyses whether the evidence is clearly written, easy to understand and implementable;
- **Conformity:** This column provides AECOM's assessment of the extent to which the policy conforms with the relevant policies or provisions of the Local Plan, the NPPF and/or the local plan evidence base as well as conforms with human rights and European law; and
- **Conclusion and recommendations:** This column summarises our thoughts on the policy, and indicates our overall recommendations for any policy or evidence changes that are required and whether specific issues need to be discussed with third parties to develop the policy further (e.g. the Highways Authority or LPA). If we consider that a policy should be deleted entirely, for example because it duplicates Local Plan policy we state this here.

### 3 Conclusions and Recommendations

#### 3.1 General Findings

- 3.1.1 In developing planning policies for the emerging Neighbourhood Plan, DTC should ensure that they do not merely repeat existing national and local planning policies. In a robust neighbourhood plan, neighbourhood policies would either increase the ‘bite’ and/or specificity of local plan policies (i.e. by adding local criteria and/or taking local context into account) or propose a policy where there was previously a policy void. However, when the Parish supports the LPA’s existing policy approach this can simply be referenced in supporting text rather than comprising a policy in its own right. Equally, developing measurable metrics (targets or indicators) to monitor effects of implementation is another way of ensuring the Neighbourhood Plan can add value over and above local and national policies.
- 3.1.2 All evidence that the DTC relies on in developing their planning policies should be properly referenced within the Neighbourhood Plan. The supporting text to each policy must refer to the evidence base used to inform that policy approach, summarising the key points, which help demonstrate how robust the policy is. The supporting text should explain why the policy is required and signpost the reader to the plan’s evidence base where they can find additional information. Policy justifications should also refer to the NNJSC evidence base and policies, as these help support the policies and provide further justification.
- 3.1.3 Additional evidence work in some cases may be required to enhance the robustness of policies. As a general rule, the more a policy departs from or goes above the Local Plan (e.g. in terms of standards), the more evidence is required in justification. It is recommended that the Town Council conduct a further check of their draft final policies to ensure they are adding value to the Local Plan and are locally specific to Desborough.

#### 3.2 Policy/topic specific findings

- 3.2.1 As noted above, DTC are particularly concerned as to the future use of Site 11 (identified in the draft NP) and Site 3 (The Damms). Our research indicates these were subject to a planning application for residential development in 2016 (ref KET/2016/0044). Our review notes that an appeal was lodged in November 2016, and an Inquiry was held on 31st October 2017; the Appeal Decision was published on 22nd December 2017, granting permission for the development. The decision can be found here: <http://www.desboughtowncouncil.gov.uk/uploads/appeal-decision-3162430.pdf>.
- 3.2.2 If the DTC was to challenge the decision it would have to go to the High Court, and would be subject to the conditions and procedures this implies; however, this is a separate matter. The focus here is the likely implications for the NP.
- 3.2.3 We recommend the group review the appeal decision to understand how the Inspector has balanced the issues of valued landscapes, landscape character, how existing public open space is used and defined, and existing planning policy. In summary, key findings and implications are:

- What legal forms of public access are currently permissible within the identified sites. Are these tracts of land private or under Council ownership, and are footpaths recorded on the Definitive Map;
- The issue of ‘valued landscapes’ was raised (p.32-34 of the decision). Evidently, case history is being built that there needs to be demonstrable evidence that such landscapes are ‘out of the ordinary’. This places emphasis on the NP group to record, and to demonstrate, such qualities or characteristics, as highlighted in AECOM’s review of Policy P3: Natural Environment;
- Boundaries of Local Green Spaces need to be carefully mapped. Baseline information including landscape character assessments / strategies, should be well-referenced to add weight to the findings of the evidence base; and
- Lastly, as stated by MHCLG (2012), communities cannot use neighbourhood planning to block the building of new homes and businesses. Further, National Planning Policy Guidance states that Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.

3.2.4 Policy P1 is a core development policy. It is therefore important that the evidence base is sufficient to underpin the policy intent. Preparation of further townscape character information, and in certain cases design briefs or codes for allocated sites, would help to strengthen the policy. Identifying local community groups, or interest groups – if such groups exist - who should be part of the co-design process is also important to achieving the aims of the policy.

3.2.5 Policy P2 should provide further detail on the types of employment opportunities, which would benefit the local community and create linkages between these recommendations and the need to protect town centre employment premises. This could be usefully supported through the reference to statistical evidence (e.g. 2011 Census data) to provide a more robust evidence base relating to local skills and educational attainment levels, and rates of economic activity. There is also the opportunity to further expand this policy through the addition of positive wording which places an onus upon developers and offers support to developments and regeneration opportunities which would contribute to the enhancement of town centre employment sites and provide opportunities for intensification and delivery of new employment floor-space.

3.2.6 For the Lawrence Site, Policy P2 should provide a development brief which highlights the desired land use and development expectations for the site. The current wording of P2 supports the development of the Lawrence Site and identifies its detrimental impact on the quality of the town centre area, however is relatively vague. Policy P2 could provide further elaboration on the community’s aspirations for the site’s regeneration. It is important however, that this aligns with the aims and development aspirations for the site and its allocation within Local Plan documents.

3.2.7 Policy P3 requires clarification about exactly what it seeks to achieve; it is not explicit whether the policy seeks to designate areas of Local Green Space. Should this be the case, the evidence base will need to be robust and ensure that areas of LGS can endure

beyond the Plan period. As it stands, Policy P3 adds little local distinctiveness to extant policy. Plan-makers may refer to Locality's guidance for further information.<sup>4</sup>

- 3.2.8 Policy P5 requires revision to ensure its clarity and appropriateness. It currently lacks direction and while underpinned by themes within the Local Plan, is not currently implementable due to confused text and a range of themes, which do not all directly relate to the delivery of Priority Infrastructure. In revising P5, it is also important not to create policy where the existing Local Plan policy and supporting evidence base documents are satisfactory, as this risks inconsistency and confusion for developers, plan makers, and stakeholders.

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<sup>4</sup> <https://neighbourhoodplanning.org/toolkits-and-guidance/making-local-green-space-designations-neighbourhood-plan/>

## 4 Recommendations for next steps

4.1.1 This neighbourhood plan evidence base and policy review has aimed to provide the DTC with recommendations on policy approaches to undertake in the Desborough Neighbourhood Plan. We recommend that the Town Council should, as a next step, discuss the contents and conclusions with KBC with a view to agreeing and formulating draft housing policies, taking the following into account during the process:

- the contents of this report, including but not limited to **Appendix 2**;
- Neighbourhood Planning Basic Condition E, which is the need for the neighbourhood plan to be in general conformity with the strategic development plan;
- the views of the KBC;
- the views of local residents on draft policies and other potential policy themes; and
- the views of other relevant local stakeholders, including housing associations.

## Appendix 1: Further guidance on Neighbourhood Policy Planning

Further advice can also be found in the following places:

- Advice on writing planning policies is available on the Locality website; <http://mycommunity.org.uk/wp-content/uploads/2015/02/Writing-planning-policies-v51.pdf>
- Advice on drafting Neighbourhood Development Orders is available on the Locality website; <http://locality.org.uk/wp-content/uploads/Roadmap-worksheets-map-May-13.pdf>
- Further advice on developing the evidence base may be useful, and is provided by the 'Developing a Data-Driven Evidence Base' document available on the Locality website;
- [http://planning.communityknowledgehub.org.uk/sites/planning.communityknowledgehub.org.uk/files/neighbourhood\\_planning\\_evidence\\_base.pdf](http://planning.communityknowledgehub.org.uk/sites/planning.communityknowledgehub.org.uk/files/neighbourhood_planning_evidence_base.pdf)
- <https://neighbourhoodplanning.org/toolkits-and-guidance/making-local-green-space-designations-neighbourhood-plan/>

These best practice toolkits, together with a final health check, which is available free of charge, will aid the Town Council in ensuring the Plan meets the Basic Conditions that enable a draft plan to proceed to referendum.

## Appendix 2: Detailed Evidence and Policy Review

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
<p><b>Policy P1 – Core development criteria</b></p>	<p>This policy seeks to impose three controls to safeguard the design quality of future development:</p> <ul style="list-style-type: none"> <li>- The protection of locally valued historic building / heritage features;</li> <li>- The need for community engagement and cooperative design, and subsequently demonstrable support, for new development; and</li> <li>- The application of accepted best practice design criteria, assessment and review</li> </ul>	<p>The principal evidence cited for policy P1 includes:</p> <ul style="list-style-type: none"> <li>- Desborough Neighbourhood Plan Community Consultation Report: Supplementary Document A (Draft October 17);</li> <li>- Desborough Neighbourhood Plan: Character Appraisal Supplementary Document B (Draft October 2017).</li> </ul> <p>Other sources of information cited for the Neighbourhood Plan more generally, which are therefore considered to have influenced</p>	<p>This policy considers the overarching principles of ensuring design quality. It therefore relies upon more detailed information provided by the evidence base.</p> <p>In respect of the protection and enhancement of the historic environment (P1 1.1), the evidence base (SD.B) is comprehensive, has been guided by professionals, and identifies particular streetscapes / townscape areas with unique qualities. This information is crucial to the policy. The analysis is presented statistically, comparing each area against other parts of the town.</p>	<p>In general, greater weight is placed on the NP supplementary documents. The cross-cutting analysis of links to the planning framework in Table 1, p.12 ensures that references to other supporting evidence can be found as part of an appreciation of the wider planning policy context. The table also demonstrates how the NP seeks to add value. On an aside, it may be prudent to simplify these references to the NPPF headings, rather than specific paragraphs.</p> <p>Although the NP makes reference to / compliance with adopted documents of the</p>	<p>The policy wording is clear and concise.</p> <p>The aims of the policy are broad, since it concerns the protection of locally valued historic assets, community engagement, and securing design quality. Consequently, two issues arise: first that the intent and focus of the policy is slightly ambiguous; and second, that implementing the policy may prove difficult.</p> <p>In respect of section 1.1 a distinction needs to be drawn between the Listed Buildings and Conservation Area mapped in SD.B, and non-designated assets. Assets protected through</p>	<p>The cross-cutting analysis of links to the planning framework in Table 1, p.12 ensures that reference to other supporting evidence can be found as part of an appreciation of the wider planning policy context.</p> <p>In general the policy conforms to the principles of the NPPF; however, the wording needs to be carefully considered to ensure it is being correctly implemented.</p> <p>The wording of Section 1.1 suggests that development proposals 'must <u>demonstrate robust evidence of local community support</u>'. As discussed previously, this is not a realistic or fair expectation. The intent of the NPPF is to '<u>take account of the views of the community</u>'(p.16, 66).</p> <p>Section 1.2 effectively reinforces the NPPF (66) in respect of public consultation. To make it more relevant to the NP area, are there specific local community groups or interest groups who should be consulted with who could be named here? Place-making is dealt with more comprehensively</p>	<p>AECOM would recommend that the evidence base is strengthened to reinforce statistical comparison with more detailed townscape character information to ensure that sufficient detail is provided regarding the characteristics / special qualities of each area.</p> <p>We would recommend that P1 1.1 is amalgamated into Policy 3, which also concerns 'Protecting and safeguarding assets of natural and historic heritage value'. In doing so both policies would be strengthened, and have more clearly defined aims. The NP wording should be amended to ensure that the aims of Policy 1 and Policy 3 are interlinked.</p> <p>Evidence of public consultation processes is a requirement of the NPPF and does not need to be duplicated by NP policy. Section 1.2 of Policy P1 should be amended to add details of specific local community groups or interest groups who should be consulted; otherwise this policy wording should be removed. Reference to co-design, and place making are in part covered by 1.3</p>

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
	processes.	<p>Policy P1, includes:</p> <ul style="list-style-type: none"> <li>- The NPPF (2012);</li> <li>- The North Northamptonshire Joint Core Strategy 2011-2031 (adopted July 2016), including its Supplementary Planning Documents (not named);</li> <li>- North Northamptonshire Local Development Framework;</li> <li>- AECOM Public Realm Vision and Strategy Workshop Report for Station Road, (2015)</li> <li>- Housing Needs Assessment, (2016)</li> <li>- Desborough Site Review, (2015/2017)</li> <li>- Desborough</li> </ul>	<p>What would be useful here is to understand the unique qualities of each area, not just its relative value / rating. In terms of evidence, this then would provide characteristics / qualities that could be enhanced or conserved according to the policy aims.</p> <p>Table 1 of the SD.B evidence base considers how the Character Appraisal has informed the NP policy, yet no reference to Policy P1 is made.</p> <p>P1 1.2 concerns public consultation, participatory design, co-design and placemaking. These are important aspects of securing design quality and are therefore correct to consider in the context of this policy. This aspect</p>	<p>NNJCS, it would be helpful to identify what these are, to ensure transparency and consistency; for example, the Kettering Public Realm Strategy is identified separately (p.9), but the Kettering Sustainable Design Supplementary Planning Document (2009), and Appendix V – Sustainable Design SPD Checklist, are not.</p>	<p>existing legislation and policies should not be the focus of the NP. The current wording relates to buildings and structures, and needs to be supported by a more detailed evidence base that describes what these may be.</p> <p>With regard to 1.2, this section requires applications to demonstrate support through public consultation. While it is possible to run an engaging public consultation process this by no means guarantees public support for proposals. It would therefore be difficult to conform to, and implement, this aspect of the policy.</p>	<p>in P1 1.3 and could be amalgamated into this text.</p> <p>With regard to P1 1.3, the NPPF (62) states that LPAs should have local design review arrangements. P.63, 4.12, of the NNJCS considers the need to assess design quality and refers to local design ‘surgeries’ for certain projects. It is important to avoid any requirement to duplicate such processes, as to do so would result in unnecessary costs and delay. This can be removed from the policy wording.</p> <p>Policy 2 of the NNJCS concerns the Historic Environment generally. Policies 8, 11, 15 relate to place sharing principles, including best practice urban design and design standards.</p> <p>Policy 1 therefore duplicates a number of the strategic policies of the NNJCS, without adding the necessary value and local relevance.</p>	<p>and could be removed, or part of the policy re-worded to make this more explicit.</p> <p>Section 1.3 requires amendment to ensure that it responds not only to current, but also emerging and future guidance concerning design quality. <u>To future-proof the policy the NP group should consider wording the policy in such a way that it requires development proposals to provide evidence as to how they have responded to current (i.e. latest / most up to date) published design guidance, and best-practice principles.</u></p> <p>If there are areas of particular quality identified in the Desborough NP Character Appraisal SD.B the NP group could consider producing a design code(s) to guide development in these areas; noting the NPPF states such codes or design guides ‘should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings</p>

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		<p>Shopfront Design Guide-Urban Structure Study (2013)</p> <ul style="list-style-type: none"> <li>- Kettering Public Realm Strategy (2011)</li> <li>- Desborough Town Centre Health Check, (2010)</li> <li>- Desborough Conservation Area Appraisal, (2007); and</li> <li>- Desborough Town Centre Urban Design Framework, (2004).</li> </ul>	<p>of the policy reflects SD.A, p.14, Table 3: 8 and 10.</p> <p>Policy P1, 1.3 relates to design criteria and quality, specifically the need to demonstrate adherence to current (it is likely that they will become obsolete over the plan period) best-practice standards, criteria and assessments. It is expected that a design review panel would be aware of current best practice and this wording could be removed.</p> <p>No third party comments have been received challenging the evidence base.</p>				and the local area more generally' (p.15, 59)
Policy P2: Heart of Town and Commercial Streets	Policy P2 outlines the desire to retain and protect local businesses and the economy by retaining and	Relevant evidence from the Justification includes the Desborough Community Consultation	The Desborough Community Consultation Report: Supplementary Document provides a comprehensive	Evidence is generally proportional for the policy and provides a sufficiently robust evidence base.	The policy is straightforward and relatively easy to understand.  It is implementable and evidences local	This policy is in line with the NPPF Policy 1: Building a strong, competitive economy, which prioritises the need to secure economic growth in order to create jobs and prosperity. In line with the NPPF, Policy P2	While the policy is in line with national and local planning policy greater detail could be given on the types of local employment opportunities which are required. Detail could also be given on the types of facilities and premises

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	<p>encouraging small, local businesses. It resists the redevelopment of premises which would lead to a change in land use unless there is strong evidence to demonstrate that the existing use is no longer viable.</p> <p>The policy seeks to enhance the vitality and amenity of the town centre through preserving and enhancing existing facilities and aims to ensure that any development or redevelopment will not be detrimental to this.</p> <p>It supports the development of employment sites within the town centre which enhance the character and facilities</p>	<p>Report: Supplementary Document A, which outlines key results of three surveys undertaken: the 'Policies Survey'; 'Our Town Survey'; and 'Supermarket Survey'. These collate public responses gathered as part of community consultation for the Desborough Neighbourhood Plan</p> <p>The Evidence Log references a number of documents: the Desborough Character Appraisal; Desborough Town Centre Health Check 2010 &amp; 2015; Desborough Town Centre Urban Design Framework 2004; Public Realm Vision and Strategy for Station Road 2015; and the</p>	<p>summary of community responses and attitudes towards town centre development and enhancement of the economy and character. While providing a useful evidence base which demonstrates local views, it should be recognised that this is not an adopted policy document and merely a collation of views which have helped shape the development of the Neighbourhood Plan.</p> <p>Supplementary Document B presents a character appraisal of Desborough and confirms the desire to retain and enhance the town's assets. Similarly, this is also an evidence base document rather than adopted policy.</p> <p>The Desborough</p>		<p>policy objectives which have a basis in legislation.</p> <p>To make it implementable and provide further guidance, it would be helpful to elaborate further on the types of employment opportunities which would be beneficial to meet local need – this could be linked back to ONS statistics regarding qualifications and predominant industries at a ward and Borough level, as well as more anecdotal evidence presented as part of consultation in the Desborough Community Consultation Report.</p>	<p>establishes a clear vision and strategy which positively and proactively encourages sustainable economic growth through the protection and enhancement of the town centre economy.</p> <p>Policy P2 supports the aims of the North Northamptonshire Joint Core Strategy Policy 12: Town Centres and Town Centre Uses. This seeks to resist the loss of retail uses, while also recognizing the need to diversify and accommodate new uses where appropriate. In order to create an environment where town centre businesses can prosper, the policy emphasizes the importance of development sites coming forward and the need to enhance the amenity of the public realm.</p> <p>The policy has clear linkages with the Desborough Town Centre Urban Design Framework, supporting the need to deliver complementary town centre uses and improve the amenity of areas through redeveloping vacant sites and premises, which detract from town centre quality.</p>	<p>which could help to diversify the town's night time economy.</p> <p>There is a good level of detail and the policy is likely to be easily implementable. It is structured in bullet points which aids reader understanding and addresses the different key themes it outlines.</p>

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	<p>offered, referencing the Lawrence site as an example of a development opportunity. Development must be compliant with design and visioning documents relevant to the town centre area and take account of recommendations within.</p>	<p>Kettering Borough Shop Front Design Guide. These collate evidence on the existing quality, character, and uses within the town centre and provide guidance on the development of the town centre area to preserve and enhance character and quality.</p> <p>The Evidence Log also references the NPPF and North Northamptonshire Joint Core Strategy, which provide overarching guidance on the development and enhancement of town centres to ensure economic viability and social benefit.</p>	<p>Town Centre Health Check 2010 &amp; 2015 confirms the presence of small businesses and a mix of units, which add to the character and amenity of the town centre and confirms that vacant units are low. It confirms the assertions of policy P2 that town centre employment premises should be protected. It also notes that there are over-concentrations of certain uses, which detract from the town centre character (e.g. hot food takeaways) in line with the desire in policy P2 that there are opportunities to further develop the night time economy. It also confirms that the Lawrence site is a long-standing vacant area which offers significant redevelopment opportunities, and currently detracts from the town</p>				

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			<p>centre environment.</p> <p>The Desborough Town Centre Urban Design Framework 2004 emphasises the need to create an attractive and accessible heart of the town by enhancing its environmental quality, and that the Lawrence site is detrimental to the town centre amenity currently. It also identifies that there are a lack of complementary town centre uses, particularly leisure and food and drink uses like restaurants, which could diversify the town centre offering. It confirms the need to retain “suitable employment opportunities within the town centre to encourage vitality and activity”.</p> <p>The Public Realm Vision and Strategy for Station Road</p>				

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
			<p>2015 also confirms that there is the opportunity to capture community benefit from new development within the town centre and cites the Lawrence site as an area of unrealized economic potential which would enhance amenity and provide new opportunities for developing the local economy and enhancing the town centre's character.</p> <p>The Kettering Borough Shop Front Design Guide confirming that Desborough's main retailing areas are busy during the daytime but lack "life and vitality at other times", reinforcing the appropriateness of Policy P2's desire to enhance the nighttime economy and promote the vitality of commercial streets.</p> <p>The North Northamptonshire</p>				

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
			Joint Core Strategy 2016 supports the need to evidence viability with regard to change of use. And reflects the aims of Policy 12: Town Centres and Town Centre Uses.				
<b>Policy P3: Natural Environment</b>	<p>The 'broader aims' of the policy are contained on p.46, while more specific aims of the policy are set out on p.47. The policy aims are not particularly consistent.</p> <p>The wording of the policy itself seeks to restrict and control forms of development on identified locally valued or designated open spaces. It seeks an ecological approach to design, and use of natural materials in certain constructions.</p>	<p>The principal evidence cited for policy P3 includes:</p> <ul style="list-style-type: none"> <li>- Desborough Neighbourhood Plan Community Consultation Report: Supplementary Document A (Draft October 17);</li> <li>- Desborough Neighbourhood Plan: Character Appraisal Supplementary Document B (Draft October 2017).</li> <li>- Kettering Borough Council Historically and Visually</li> </ul>	<p>Policy P3 makes links to the findings of SD.A which demonstrate the importance of the natural environment and open space to local residents.</p> <p>The focus of the policy is the areas of open space identified on Figure 11: Natural Environment Location Map' on page 44 / 45. The policy states that these areas comprise locally designated HVI /LGS open space, and statutory designated nature sites. The policy makes reference to areas of locally valued open space</p>	<p>In general, greater weight is placed on the NP supplementary documents, with reference to the Kettering Borough Council Historically and Visually Important Open Space (2015) background report.</p> <p>Several of the sites on Figure 11 are already designated and / or protected by extant policy. Therefore it is the non-designated, locally valued sites identified in p.20-27 of the NP, which should be the focus of this policy.</p>	<p>There are some incorrect references, policy numbering, and spelling errors, which require amendment – this applies to the SD documents also. Generally the policy is clearly written.</p> <p>It is unclear why the broader aims of the policy on P.46, are not transposed into the specific Policy Aims on P.47. As a result the policy lacks clarity since the aims are not the same; the broad aims focus largely on natural environment while the P3 Aims are generally guided towards restricting or preventing</p>	<p>The cross-cutting analysis of links to the planning framework in Table 1, p.12 refers to other supporting evidence that can be found as part of an appreciation of the wider planning policy context. This table highlights the ambiguity of P3: Natural Environment, which is that it seeks to deal in part with the natural environment, design quality and community participation; the latter of which forms part of Policy P1 of the NP.</p> <p>The policy cannot apply to areas that are already afforded protection either as statutory designated sites, or through existing planning policy such as HVI/LGC spaces.</p> <p>Generally the aims of the policy broadly conform to the principles of the NPPF section 11, p. 109 and 118.</p> <p>The protection of landscape character in non-designated areas, including views, landscape</p>	<p>As it stands, Policy P3 does not add sufficient value to existing policies of the adopted NNJCS.</p> <p>To retain the policy, AECOM would make the following recommendations:</p> <ul style="list-style-type: none"> <li>- Make clear the specific aims for the policy, taking into account a positive approach to development and focus on the natural environment;</li> <li>- Make it clear whether the policy is intended to create Local Green Spaces on locally valued open space which is not currently designated, or protected by existing planning policy;</li> <li>- Provide a robust evidence base for the identified open <a href="#">spaces that demonstrate how they respond to the criteria set out in the NPPF, and</a> in order that <a href="#">any</a> LGS designation can continue after the plan period. <a href="#">Consultation should be seen as intrinsic to this process.</a></li> </ul>

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	The policy will require development proposals for renewable energy to demonstrate community support prior to planning applications being submitted. The policy seeks to prevent residential development on areas of locally valued / designated open space. Policy P3 seeks to enhance, or make provision for further provision of open space.	<p>Important Open Space (2015).</p> <p>Other sources of information cited for the Neighbourhood Plan more generally, which are therefore considered to have influenced Policy P1, includes:</p> <ul style="list-style-type: none"> <li>- The NPPF (2012);</li> <li>- The North Northamptonshire Joint Core Strategy 2011-2031 (adopted July 2016), including its Supplementary Planning Documents (not named);</li> <li>- North Northamptonshire Local Development Framework;</li> <li>- AECOM Public Realm Vision and Strategy Workshop Report for Station Road, (2015)</li> </ul>	<p>that appear to be proposed as designated Local Green Spaces; however, it is not clear from Figure 11 or Policy P3 that these are proposed designations, not existing ones.</p> <p>Referencing needs to be improved between the analysis of the open space sites in SD.A p.21-29 and the policy wording. The analysis in SD.A also needs further referencing to cite what has informed the assessment of these spaces. This information is key to understanding of what features or characteristics are unique about these areas and consequently why they require protection in the NP.</p> <p>The NPPF states (p.18, 76) that LGS should be capable of enduring beyond the end of the plan</p>	<p>Additional documents nested at a variety of scales should be referenced to support the evidence base, include:</p> <ul style="list-style-type: none"> <li>- Natural England's National Character Area Profiles 89: Northamptonshire Vales and 92: Rockingham Forest.</li> <li>Northamptonshire's Environmental Character and Green Infrastructure Suite, including: <ul style="list-style-type: none"> <li>- Current Landscape Character Strategy and Guidelines (CLCSG);</li> <li>- Current Landscape Character Assessment (CLCA); and</li> <li>- Green Infrastructure: Making the</li> </ul> </li> </ul>	<p>development.</p> <p>As discussed previously, several of the areas of open space are already designated or protected by extant policy. If it is the intention to designate remaining areas as Local Green Spaces, this is not made explicit in the policy wording.</p> <p>Taking Policy P3 3.1-3.4 in turn:</p> <p>3.1: This seeks to limit the form of development to certain types, which would be broadly consistent with the purpose of the LGS designation (NPPF, P.19, 76 'very special circumstances).</p> <p>3.2: This is closely related to P1: Core development criteria. Specifying materials for use in construction is not implementable since the standards and requirements</p>	<p>features and tranquility is provided in Policy 3 of the adopted NNJCS. Policy 4 of the NNJCS concerns Biodiversity. Policy 7 of the NNJCS concerns community services and facilities, including the protection of recreational land. Policy 8 deals with place shaping requires development to respond to landscape and green infrastructure, landscape setting and improving existing green space, Policy 9 of the NNJCS concerns sustainable buildings. Policy 19 concerns the delivery of green infrastructure. NNJCS Policy 26 concerns the sensitive siting of renewable energy proposals.</p> <p>In summary, Policy P3 duplicates extant policies of the NNJCS without adding the necessary value or local specifications.</p>	<p><a href="#">especially to demonstrate how a space is valued at the local level for more subjective criteria such as 'scenic beauty' and 'tranquility';</a></p> <ul style="list-style-type: none"> <li>- To ensure that the aims and policy wording focuses on these areas, and the unique qualities that define them.</li> </ul>

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		<ul style="list-style-type: none"> <li>- Housing Needs Assessment, (2016)</li> <li>- Desborough Site Review, (2015/2017)</li> <li>- Desborough Shopfront Design Guide-Urban Structure Study (2013)</li> <li>- Kettering Public Realm Strategy (2011)</li> <li>- Desborough Town Centre Health Check, (2010)</li> <li>- Desborough Conservation Area Appraisal, (2007); and</li> <li>- Desborough Town Centre Urban Design Framework, (2004).</li> </ul> <p>The policy wording and introductory text contains several incorrect cross references. These should be reviewed and amended.</p>	<p>period and it is therefore important that they are justified in a transparent and sufficiently detailed way.</p> <p>No third party comments have been received challenging the evidence base.</p>	<p>Connection</p> <p>KBC's 'Desborough Town Centre Urban Design Framework (Adopted January 2014)', which examines the relationships and importance between the built and natural environment.</p>	<p>of development sites will be unique and may not meet these criteria.</p> <p>3.3 [note: written as 3.2 in NP]: As with P1, evidence of community support is an unrealistic expectation and places an onerous burden on potential development proposals. Neighbourhood Planning and Community Right to Build lets communities grant planning permission directly under certain circumstances and therefore this wording could be removed.</p> <p>3.4: MHCLG (2012) Neighbourhood Planning states that if the local planning authority says that an area needs to grow, then communities cannot use neighbourhood planning to block the building of new homes and</p>		

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					businesses; they can, however, use neighbourhood planning to influence the type, design, location and mix of new development. This aspect of the policy reads as though in exceptional circumstances development would be allowed if provision of quality green space was provided. It is therefore not clear what the intention is and this could lead to difficulty implementing this policy.		
<p><b>Policy 4: Housing</b>  <i>The Need for a Housing Policy</i>  <i>Broader Aims</i>  <i>Broader Justification</i>  <i>The Relevance of Housing Quality</i>  <i>(pp. 48-49)</i></p>	<p>The policy has multiple objectives, which are quite clearly stated, both as broader aims (p.49), and specifically as aims (p.51).</p> <p>Our understanding is that the aims are to ensure the quantum and appropriateness</p>	<p>The starting point for the policy is North Northamptonshire Joint Core Strategy 2016 (NNJCS), which allocated 422 homes to Desborough, in addition to existing commitments of 938 homes, up to 2031.</p>	<p>There is a good flow of logic in this introductory section, explaining the reasoning behind the policy and the evidence underpinning it.</p>	<p>The evidence is proportional to neighbourhood planning, having been based on a range of site assessments in consultation with the community. These assessments are summarised in detail and appear to have been carried out in a fair and objective</p>	<p>The policy would be more effective if the introduction clearly stated that the sites to be allocated have been chosen having regard to both the technical and the consultation evidence bases; outlined clearly the documents in each of these categories; and explained that the role of the policy is to bring</p>	<p>The policy is in conformity with the NPPF, NPPG, and the relevant planning policy documents of both North Northamptonshire County Council and Kettering Borough Council. The Policy is in conformity with NPPF Paragraph 47 to the extent which it applies to Neighbourhood Planning, and in particular with Paragraph 48. It is also in conformity with Paragraphs 59- 61, and particularly with Paragraph 66. They also are in conformity with paragraph 94 and 99 regarding climate change mitigation.</p>	<p>The evidence is broadly appropriate though some amendments and clarifications are needed. In particular, the entire housing policy section would benefit from reordering, streamlining and editing down, as there are fully five pages of supporting text. Further pointers towards the underlying evidence are needed throughout, including page number references (particularly for the community consultation work). Again, this also applies to other policies in the plan.</p>

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	of development, and its location with regard to key issues important to the community, in particular design quality.	The introductory text references work undertaken by Lathams and AECOM to provide evidence for the Neighbourhood Plan, including site assessments, housing needs assessment, as well as the extensive community participation in the process and reports on these activities. Furthermore Kettering Borough Council's Emerging Site Specific Local Development Documents and Local Plan seek to identify appropriate sites for development in Desborough.		<p>way. By including a table of these assessments, it is clear how differences in assessments have been overcome by considering all in the round. However it would be helpful to understand how the target of 400 has been established (as opposed to 422). Was this as a direct result of the HNA? Could a page numbered reference be provided, as well as the number of homes already committed? This would significantly improve clarity.</p> <p>It would be helpful to have some evidence on starting points for density assumptions, e.g. a simple measurement of existing densities in the town. This could be complemented by</p>	<p>the two evidence bases together and in so doing, allocate sites for housing. Such clarity would also benefit other policies in the plan.</p> <p>This section would be more effective if it were slimmed down, and made shorter and punchier, with more pointers to the evidence base at the appropriate times. At the moment, there is too much background information and it is somewhat confusing. Similarly the supporting text could be less repetitive. The role of supporting text is only to provide more detail on the words within the policy text, and therefore should avoid general discussions of the issue as a whole, which should be limited to the evidence base documents rather than the plan itself.</p>	<p>The policies are also in conformity with the Joint Core Strategy, including the greater emphasis on urban design and the framework for locally-driven plans in rural areas which are stated ambitions of the core strategy. It also contributes to historic environment, particularly relating to enhancing key views (Policy 2), Conserving landscape character and protect the landscape setting (Policy 3), protecting biodiversity (policy 4) and managing flood risk (policy 5) by directing development to appropriate locations. Furthermore it is in conformity with the housing requirements set forth in Policy 28, the policy for distributing new homes across the district, Policy 29, and policy 30 describing housing mix.</p> <p>However, it might be helpful to break down the upfront table on conformity by policy so there is a short section confirming conformity within each individual policy.</p>	<p>The group should consider titling the first page as 'introduction', as it is somewhat confusing that we see the title of the page as Policy 4, but don't get to the actual policy until the following page. Alternatively, the structure of all policies in the plan could be changed so that the policy either comes first, followed by supporting text, or vice versa, rather than buried in the middle.</p> <p>In general, the structure of the policy is confusing, and it might be better split into two policies: the site allocation/ prioritization itself and the site specific design policies, particularly given that the evidence base for the site allocations themselves (i.e. establishing the principle of development) may be quite separate from considerations underpinning the site specific design policies. Similarly, that there are two lists labelled as aims is confusing, and should be revised.</p> <p>It would be helpful to change the formatting as the large number of boxes reduces their effectiveness. Justification texts should not necessarily be in a box, as too many boxes are confusing and detract from the primacy of the policy text itself, which is the only text that should be in a box, to highlight its primacy.</p>

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
				an assessment of any existing policy on density, including work done by the LPA as part of the Rothwell & Desborough Urban Extension AAP, which should be mentioned specifically by name, rather than referred to generally as a Site Specific DPD.			
<b>Policy 4: Housing</b> <i>Housing Sites Location Map</i> <i>P4 Aims</i> <i>P4 Justification</i> <i>P4 Main Evidence</i> <i>P4 Housing Policy (pp. 50-51)</i>	<p>Our understanding is that the policy intends to allocate sites for development which are sustainable and in line with the views of the community.</p> <p>However, the text in the justification box appears to overlap with the aims, and does not seem to chime with other justification boxes. The use of numbers here</p>	<p>The text references a broad range of evidence studies, including technical reports produced by consultants, and community consultation reports.</p>	<p>The evidence has not been linked to the specific sections of the policy here, and therefore it is of little use simply as a list. The list also includes the erroneous line “Also see Table 1 in p.12 verify coordination with NPPF and NNJCS.”</p> <p>The map may be trying to illustrate too many issues at once. It is not clear what specifically residents agreed to (as indicated on the map).</p> <p>Furthermore it is</p>	<p>Broadly, the policy and the evidence underpinning it is proportional. However, it would be helpful to disaggregate the sources of evidence- for example, which evidence is from Lathams, from landowners, and which from the county and district council, e.g. the urban structure study.</p> <p>The page references are not correct within the policy itself.</p>	<p>The policy would be more effective if the first sentence more clearly stated “The policy applies to any development containing residential uses and requires that they meet the following conditions:...”</p> <p>The policy would be more effective if policy 4.3 was reworded as “have appropriate regard to the design principles of...”</p> <p>The policy would be more effective if the term “holistic integral approach”</p>	<p>The policies are in conformity with the NPPF, NPPG, and the relevant planning policy documents of both North Northamptonshire and Kettering Borough Council.</p> <p>The Policy is in conformity with NPPF Paragraph 47 to the extent which it applies to Neighbourhood Planning, and in particular with Paragraph 48. It is also in conformity with Paragraphs 59-61, and particularly with Paragraph 66. They also are in conformity with paragraph 94 and 99 regarding climate change mitigation .</p> <p>The policies are also in conformity with the Joint Core Strategy, including the greater emphasis on urban design and the framework for locally-driven plans in rural areas which are stated ambitions</p>	<p>The policy is somewhat confusing in its structure. The policy would be much clearer if the map formed a double page spread with the grid diagram on page 52, thus leaving the actual policy on page 51 to come first, forming a spread with what appears to be further parts of the policy (priority for development criteria and housing provision criteria).If these do not form part of the policy itself, but are supporting text, this should be made clearer.</p> <p>The map could be improved and clarified somewhat, the diagram should be corrected, and should somehow be caveated to show that some sites were assessed as multiple plots. More detail should be provided as to the meaning of holistic and integral approach to design.</p>

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
	is particularly unclear.		<p>somewhat misleading in its relation to the table on the following page, as in some cases the sites listed were in fact assessed as multiple sites.</p> <p>The map does not explain what the Grange II Site is and what its status is, or give further detail on the Lawrence Site. The map should be possible to read as a standalone page and the legend should be updated for clarity.</p>	It is slightly confusing how these policies relate to the Priority for Development Criteria and Housing Provision Criteria on the following page, if at all. Reference to these should be incorporated into this box if they are indeed part of the policy.	was better defined, as this has not been used elsewhere in the plan. This could be reworded as “in an integrated way”, to signal that multiple work streams have been considered simultaneously rather than in isolation.	<p>of the core strategy. It also contributes to historic environment, particularly relating to enhancing key views (Policy 2), Conserving landscape character and protect the landscape setting (Policy 3), protecting biodiversity (policy 4) and managing flood risk (policy 5) by directing development to appropriate locations. Furthermore it is in conformity with the housing requirements set forth in Policy 28, the policy for distributing new homes across the district, Policy 29, and policy 30 describing housing mix.</p> <p>The relationship between neighbourhood plan policies relating to urban design issues such as sustainable urban drainage systems and local plan policies is not currently clear enough. The local plan policies have been reviewed for the purposes of this exercise, and it appears that value has been added within the neighbourhood plan via specific reference being made to minimizing the amount of “water discharged, favouring natural drainage and permeable surfaces”. It would be helpful if there was a little more clarity on which local policies are being strengthened at neighbourhood level and why.</p> <p>There is no mention of a holistic or integral approach to design in the local plan, save in relation to</p>	

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
						SUDS, and so this is considered to add some value to existing policies.	
<p><b>Policy 4: Housing</b></p> <p><i>Summary of Various Capacity Analysis</i></p> <p><i>Site Specific Design Criteria</i></p> <p><i>Priority for Development Criteria</i></p> <p><i>Housing Provision Criteria</i></p> <p><i>Broader Justification</i></p> <p>(pp. 52-53)</p>	<p>The intention of the policy is clear from previous pages, although drilling down into the housing provision criteria it becomes somewhat less clear what the intention is, as there is no indication as to whether this forms part of the policy or not. It is assumed that this forms part of the site specific design criteria, but this is not clear as currently laid out.</p>	<p>The evidence presented in the text is quite comprehensively presented, with the table being particularly helpful. The text also explains how further technical evidence and consultation with the community has informed the policy.</p>	<p>There appear to have been some errors made in compiling the table, specifically with regards to AECOM’s recommendations. None of the sites listed as discounted were in fact discounted in the final version of AECOM’s report. This needs to be checked and corrected.</p>	<p>The relevance of the urban structure study reference is not entirely clear. Is this related to access issues being resolved in land owner representations? This could be elaborated further, e.g. “the urban structure study has been used to inform the site specific policies that follow, in particular relating to the access issues that will need to be resolved to make the site appropriate for development.” It should be made clear that the study is not in itself a transport assessment, but does form a part of the transport evidence base.</p>	<p>The policy would be made more effective if the word “viable” was replaced with ‘developable’, as viable has a specific meaning in planning terms relating to financial viability, and implies that there is evidence relating to this topic.</p>	<p>The policies are in conformity with the NPPF, NPPG, and the relevant planning policy documents of both North Northamptonshire and Kettering Borough Council. The Policy is in conformity with NPPF Paragraph 47 to the extent which it applies to Neighbourhood Planning, and in particular with Paragraph 48. It is also in conformity with Paragraphs 59- 61, and particularly with Paragraph 66. They also are in conformity with paragraph 94 and 99 regarding climate change mitigation . The policies are also in conformity with the Joint Core Strategy, including the greater emphasis on urban design and the framework for locally-driven plans in rural areas which are stated ambitions of the core strategy. It also contributes to historic environment, particularly relating to enhancing key views (Policy 2), Conserving landscape character and protect the landscape setting (Policy 3), protecting biodiversity (policy 4) and managing flood risk (policy 5) by directing development to appropriate locations. Furthermore it is in conformity with the housing requirements set forth in Policy 28, the policy for distributing new homes across the district, Policy</p>	<p>This section of the policy is particularly confusing. It is somewhat unclear as to how these pages, with the range of text boxes, relates to the previous page, or whether any of this is still part of policy 4 or just supporting text. In particular, the priority for development criteria could be either labelled as Policy P4 continued, or labelled to indicate otherwise. The table should be corrected, the references clarified, and the relevant additions and substitutions made.</p>

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
						29, and policy 30 describing housing mix.	
<b>Policy 4.a Site 'a' design criteria</b>	The intent of the policy is to create design criteria to guide development on the site so as to make it an acceptable location for development in the eyes of the local community.	Reference is made to the results of a consultation held in Summer 2017.  Reference is made to the NNJCS.	No reference is made to technical evidence studies. It would be helpful to reference the consultation document in question and the page number referred to in the justification text. It is somewhat confusing that the justification texts are in a box when other text comprises the policy itself.	The reference to this site in table on p. 52 is not correct. This site was not discounted from AECOM's final site assessment. AECOM's assessment gave a capacity of 230 homes, and suggested the site was potentially appropriate for allocation.	This policy would be made more effective if each of the six sub-criteria had some kind of reference to the evidence base. It is likely that the suite of evidence documents, including the characterization study, traffic studies and consultation reports would be able to support these conclusions.	The policies are in conformity with the NPPF, NPPG, and the relevant planning policy documents of both North Northamptonshire and Kettering Borough Councils. The Policy is in conformity with NPPF Paragraph 47 to the extent, which it applies to Neighbourhood Planning, and in particular with Paragraph 48. It is also in conformity with Paragraphs 59- 61, and particularly with Paragraph 66. They also are in conformity with paragraph 94 and 99 regarding climate change mitigation. The policies are also in conformity with the Joint Core Strategy, including the greater emphasis on urban design and the framework for locally-driven plans in rural areas which are stated ambitions of the core strategy. It also contributes to historic environment, particularly relating to enhancing key views (Policy 2), Conserving landscape character and protect the landscape setting (Policy 3), protecting biodiversity (policy 4) and managing flood risk (policy 5) by directing development to appropriate locations. Furthermore it is in conformity with the housing requirements set forth in Policy 28, the policy for distributing new	As a general comment on the site-specific policies that follow, the policies could be developed further by including high level street layouts, with the proviso that these are indicative only. These would help to show how the community intends various guidance documents they have referenced, e.g. Manual for Streets, to be interpreted with regards to road layouts, rather than leaving these to chance, and are standard practice in urban design policies like this. The street layout would not be binding on the developer but would, for example, help ensure that the right form and layout of development results, e.g. permeable and legible, pedestrian-friendly, layouts. A useful reference here would be the Urban Design Compendium (English Partnerships, 2000). It would also be helpful if each map had a clearer key or some other indication of what each feature is, as this is not entirely clear. We assume there is some kind of colour-coding, but this is not certain.

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
						homes across the district, Policy 29, and policy 30 describing housing mix.	
<b>Policy 4.b Site 'b' design criteria</b>	<p>The intent of the policy is to create design criteria to guide development on the site so to make it an acceptable location for development in the eyes of the local community.</p> <p>However, given that planning has already been granted for the southern portion of the site, the aims of the policy justification are somewhat unclear.</p>	<p>Reference is made to the results of a consultation held in Summer 2017.</p> <p>Reference is made to the NNJCS.</p>	<p>The justification relates to the part of the site, which has already had a planning application come forward. AECOM previously advised in its Site Allocation report that these sites should be considered together and be phased sustainably. This has not been reflected clearly in the policy.</p> <p>Some evidence appears to be implied without being referenced. For example, “the main access needs to be provided through Arthingworth Road, this is in order to avoid putting any extra strain onto existing streets” implies that there is technical evidence on the actual levels</p>	<p>Both this and the other site specific policies make no reference to how they fit within the policy hierarchy of the NPPF and the Local Plan. Whilst it is important for neighbourhood planning evidence to be proportionate, each of these design policies is in effect a policy in its own right, and therefore needs some evidence behind it. For design policies, this evidence would include transport assessment, local character assessment and so on.</p>	<p>This policy would be made more effective if each of the seven sub-criteria had some kind of reference to the evidence base. It is likely that the suite of evidence documents, including the characterization study, traffic studies and consultation reports would be able to support these conclusions.</p>	<p>Whilst this policy appears to be in conformity with local and national policies, the requirements placed on representations for the southern half of the site duplicate existing planning requirements (e.g. community consultation and the need for a transport assessment). Some of the terms used here, e.g. the reference to the “capitalization of homes in the market” are not land use planning issues, and therefore should be removed. The Policy is in conformity with NPPF Paragraph 47 to the extent, which it applies to Neighbourhood Planning, and in particular with Paragraph 48. It is also in conformity with Paragraphs 59- 61, and particularly with Paragraph 66. They also are in conformity with paragraph 94 and 99 regarding climate change mitigation. The policies are also in conformity with the Joint Core Strategy, including the greater emphasis on urban design and the framework for locally-driven plans in rural areas which are stated ambitions of the core strategy. It also contributes to historic environment, particularly relating to enhancing key views (Policy 2),</p>	<p>The policy is broadly appropriate; however, more specific references need to be made in terms of evidence and policy conformity.</p> <p>In particular, the term ‘unnecessary stress’ is a subjective value judgement as well as having the potential to pre-empt specific developer proposals for the site at a time when these are not yet known. This should be deleted, and the plan should seek a deliberately neutral tone in cases like this where specific proposals have not yet been developed.</p> <p>There should be more clarity on the division of the site into two, both on the map and in the text.</p>

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
			<p>of traffic in this road. This should be referenced or clarified.</p> <p>Similarly, the fact that the southern portion of the site “has established species” has not been evidenced correctly. Which species? Are they protected? If not, then they are less relevant in planning terms.</p>			<p>Conserving landscape character and protect the landscape setting (Policy 3), protecting biodiversity (policy 4) and managing flood risk (policy 5) by directing development to appropriate locations. Furthermore it is in conformity with the housing requirements set forth in Policy 28, the policy for distributing new homes across the district, Policy 29, and policy 30 describing housing mix.</p>	
<b>Policy 4.c Site ‘c’ design criteria</b>	<p>The intent of the policy is to create design criteria to guide development on the site so to make it an acceptable location for development in the eyes of the local community.</p>	<p>Reference is made to work by Lathams and AECOM.</p> <p>Reference is made to enquiries made with Harrislamb, presumably representing the landowners, but this should be clarified.</p> <p>Reference is made to the results of a consultation held in Summer 2017.</p> <p>Reference is</p>	<p>The evidence provided is the most comprehensive of all the policies, given that a specific page reference is given for the Urban Structure Study.</p> <p>Furthermore, specific reference is made (although there is no page number) to feasibility work undertaken by Lathams on the topic of pedestrian links and how this lined up with the evidence noted</p>	<p>Broadly, the evidence is proportionate and there are no significant gaps. It would be helpful to update this based on whether a planning application has indeed been submitted, and whether access and highways issues are deemed to have been resolved.</p>	<p>This policy would be made more effective by explaining how the evidence base relates to each of the issues at hand. In a sense, the policy would be more effective with just a few words of justification for each point, rather than a large block of text seeming to justify a range of different design criteria.</p>	<p>The policies are in conformity with the NPPF, NPPG, and the relevant planning policy documents of both North Northamptonshire and Kettering Borough Councils.</p>	<p>Whilst the evidence has been appropriately analysed and referred to, this has not been done consistently throughout the policy. Furthermore, the plan is likely to be in place for a number of years, and therefore it should be updated to reflect the current status of the site. It would not be appropriate to include a line in the plan suggesting that “conversations are ongoing to resolve the issue” as this is likely to be superseded fairly early in the overall plan period.</p>

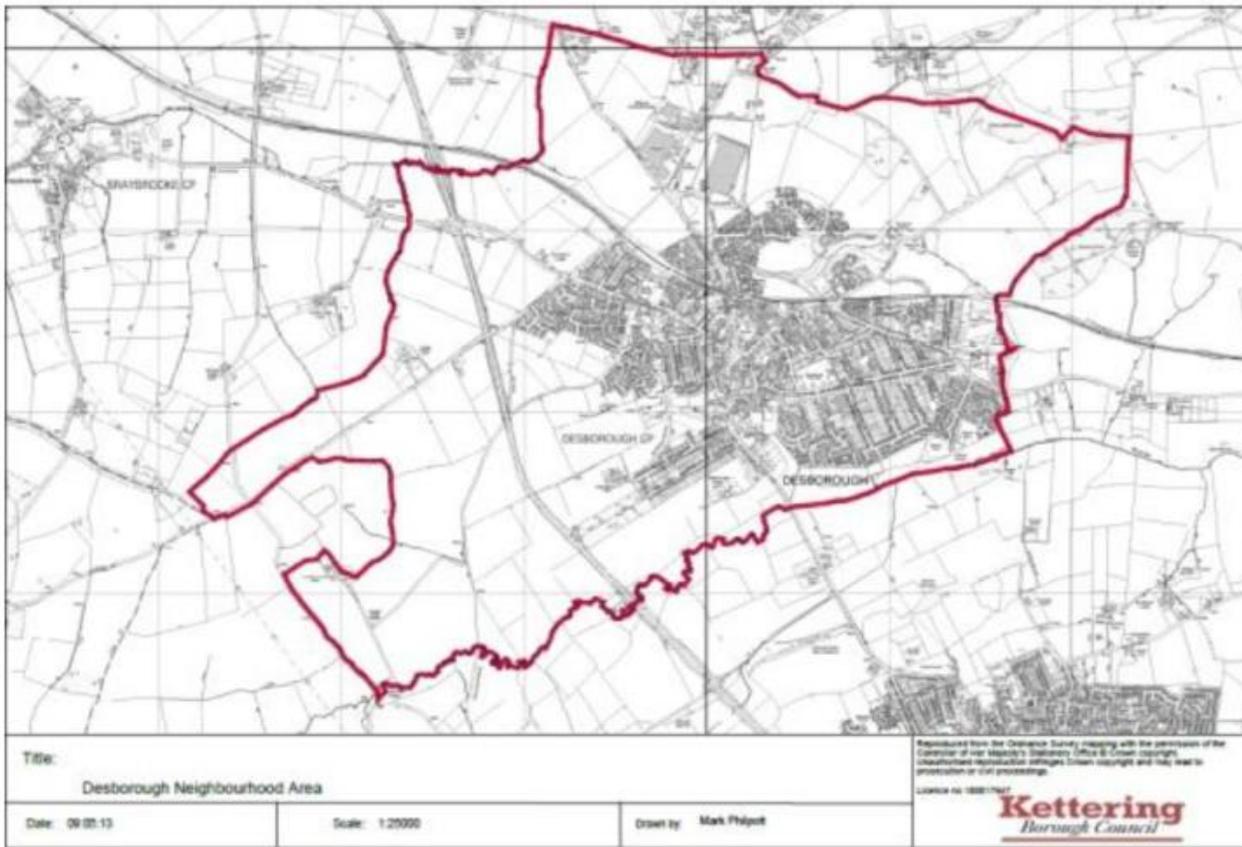
Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
		made to the NNJCS. Reference is made to the Urban Structure Study, with a specific page reference given.	above.				
<b>Policy 4.d Site 'd' design criteria</b>	The intent of the policy is to create design criteria to guide development on the site so to make it an acceptable location for development in the eyes of the local community.	<p>Reference is made to representations made by RDC Development Consultants, presumably on behalf of the landowner, but this should be clarified.</p> <p>Reference is made to technical studies, although these are not specifically listed.</p> <p>Reference is made to the results of a consultation held in Summer 2017.</p> <p>Reference is made to the NNJCS.</p>	<p>The justification box is somewhat confusing as it refers to the following page in addition to this one.</p> <p>The planning system has a range of mechanisms to mitigate the impacts of development. Therefore, the reasoning for site E to be discounted is not entirely clear and will require additional information as to why mitigation was not considered possible</p>	There is no explanation as to how the evidence has informed the judgements that the site contains “valuable green areas and landscape and wildlife assets”, such that these appear to be a matter of conjecture. Note comment above on species- almost all sites will have some form of wildlife but the key consideration in planning terms is if the site is home to protected species- and, assuming no prior environmental designations, this is normally determined by a Phase One Ecology Assessment at the time of application	This policy would be made more effective by explaining how the evidence base relates to the issues at hand. In a sense, the policy would be more effective with just a few words of justification for each point, rather than a large block of text seeming to justify a range of different design criteria.	The policies are in conformity with the NPPF, NPPG, and the relevant planning policy documents of both North Northamptonshire and Kettering Borough Council's. There appears to be some repetition of the duty to consult on any planning application that comes forward, as this is already a requirement of the planning system and need not be restated.	This policy is fairly confusing in that the justification box refers to both this and the following policy. There are considerable gaps in the evidence to support the specific claims that are made about the site, and these should be addressed. It is worth considering whether all of these site specific design policies could be restructured to point towards evidence for each type of policy, rather than the evidence for the entire site falling under a single justification heading.

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
				<p>rather than in the plan itself.</p> <p>It would be helpful to update this text based on whether a planning application has indeed been submitted, and whether transport and access issues are deemed to have been resolved.</p>			
<b>Policy 4.e discounted sites</b>	<p>The intent of the policy is, in the round, clear, in that it aims to prevent development from occurring on these sites. However, there is some confusion as to what is site 'e' and what is policy E.</p>	<p>The justification text references the NPPF (Paragraph 11, incorrectly labelled as Policy 11).</p> <p>The text also references the adopted NNJCS Policy 19 and Policy 20.</p> <p>The text also makes reference to the Consultation Report of October 2017 as evidence of community support.</p>	<p>The table on p. 52 is not correct. Site DE/211 was not discounted from AECOM's final site assessment. AECOM's assessment gave a capacity of 180 homes, and suggested the site was potentially appropriate for allocation, if NCC Highways agreed that Federation Road would form acceptable access to a new development. This has been referenced appropriately as needing further</p>	<p>The Ise Valley Site (DE/210) has, rather confusingly, not been incorporated into the map on page 50 nor the table on page 52 (although it is included on page 45). As such its relevance is somewhat unclear. It would be helpful if it were included and if references to policy E elsewhere made it clear that in fact two sites rather than one have been discounted. Furthermore, this</p>	<p>The policy would be more effective if it made specific reference to the feasibility work undertaken by the consultants. As it is currently written, the page reference appears to be to AECOM's work, although the reference is in fact within the neighbourhood plan itself.</p>	<p>It is unclear whether this policy is in conformity with national policy. This could be resolved by making this part of the evidence base rather than a policy. A separate policy indicating where development will not occur is not required, just policies that do allocate.</p>	<p>This policy is not appropriate as part of the site allocations, and should be removed. This would be more appropriate as an evidence base document rather than in the plan itself. Whilst it is important to state in the evidence base why the site was discounted, this should not be in the plan itself.</p>

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
			investigation.	site was not discounted from AECOM's final site assessment. AECOM's assessment gave a capacity of 304 homes, and suggested the site was potentially appropriate for allocation, though it suggested that splitting the site up into smaller parcels would be appropriate given the different levels of suitability across the site.			
Policy P5: Priority Infrastructure Projects	Policy P5 aims to ensure the delivery of key infrastructure projects, which will support residential growth and enhance the quality of the town centre environment. Key to this is the delivery of new education and healthcare infrastructure in order to respond to demand from	Relevant evidence from the Justification includes the Desborough Community Consultation Report: Supplementary Document A, which outlines key results of the 'Policies Survey' undertaken as part of community consultation for the Desborough Neighbourhood	The Desborough Community Consultation Report and work undertaken by the steering group to gather the thoughts of the community form the sole evidence base for Policy P5. The policy does not draw upon the NPPF and North Northamptonshire Joint Core Strategy explicitly, both of which outline clearly the	Evidence is limited but generally proportional given its aspirational content.  Policy P5 could be made more robust by drawing stronger linkages between the need for infrastructure delivery as outlined in the NPPF and North Northamptonshire Joint Core Strategy. Given the	A key limitation of this policy is the fact that the introductory text in this section of the Plan which outlines "the need for a priority infrastructure projects policy" does not link well to Policy P5 itself. There appears to be a large portion of surplus text which describes the historical and architectural value of the town centre,	Policy P5 is in line with the aims of the NPPF and supports the North Northamptonshire Joint Core Strategy Policy 10: Provision of Infrastructure however fails to draw linkages to these, which would enhance the robustness of the Policy.  As outlined in 'Effectiveness of Policy' there is a lack of conformity with the introductory text and broad aims outlined and the wording of Policy P5 itself.	The introductory text which precedes Policy P5 should be revised to provide greater clarity for the reader on the purpose of the policy.  While the policy is in line with national and local planning policy, clear linkages are not drawn and therefore there is considerable opportunity to make this policy more robust and implementable.  The policy name 'Priority Infrastructure Projects' should also be considered, with 'Priority Infrastructure' suggested as more appropriate, given that the 11 'projects' are themes and

Policy name, number & theme Name	AECOM Understanding of Policy Intent	Evidence Source and Type	Evidence Analysis	Proportionality & Gaps	Effectiveness of Policy	Conformity Check	Conclusion and recommendations
	<p>new residential development. Additionally, the policy identifies 11 infrastructure themes identified in the Neighbourhood Plan document, which it suggests the Steering Group would help to source funding for.</p>	<p>Plan. The Main evidence also cites the Desborough Community Consultation Report as the primary evidence base for the development of this policy.</p> <p>Justification also provides commentary that the community has been disheartened in the past when local objectives have not been met, and that it is a priority of the local plan that projects are enforced.</p>	<p>necessity for infrastructure provision to respond to residential growth.</p>	<p>limited policy evidence for Policy P5, it is suggested that background information on the existing education and health infrastructure (particularly the current capacity of facilities and any areas of deficiency) could provide a richer and more appropriate policy context.</p>	<p>the identification of a site for provision of a supermarket within the local plan, and discussion of the potential benefits of developing a local market strategy. While providing general context on Desborough, this commentary is not directly related or useful to Policy P5 and therefore creates confusion for the reader. The Broader Aims section and some of the Broader Justification text also lack focus and relevance to the wording of Policy P5.</p>		<p>strategies rather than specific projects. As such, the description of the 11 Infrastructure themes as ‘projects’ should also be reconsidered to give greater clarity.</p>

### Appendix 3: Desborough Neighbourhood Area



Source: Kettering Borough Council

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Address: AECOM Aldgate Tower 2 Leman Street  
London E1 8FA, United Kingdom  
Phone number +44 (0) 20 7798 5000