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11th October 2019

Dear Colin

West Northamptonshire Strategic Plan – Issues Consultation

Thank you for consulting the North Northamptonshire Joint Planning & Delivery Unit (JPDU) on the above. An officer response is set out below, which will be reported to the North Northamptonshire Joint Planning Committee (NN JPC) at its meeting on 23rd October 2019 for endorsement.

Both Joint Planning Units have worked closely along with the partner LPAs to ensure ongoing co-operation in identifying and addressing strategic cross-boundary matters. This will be important in the preparation of both Strategic Plans to meet the requirements of the Duty to Cooperate. The NN JPC considered the need to update the North Northamptonshire Joint Core Strategy (NN JCS) at its 25th July 2019 meeting. The JPC agreed that the JCS does not require updating at the present time, for the reasons set out in the report. The JPC also agreed that when an update of the NN JCS commences it should be referred to as the NN Strategic Plan and should cover the period 2020-2041, with the spatial vision potentially extending to 2050 to align with the Arc. An end date of 2041 is consistent with the proposed end date for the WNSP, which should allow evidence and cross-boundary issues to be considered more effectively (including potential for joint commissioning of technical work).

Cross-Boundary issues were extensively considered in the development of the North and West Northamptonshire Joint Core Strategies. The key cross-boundary issues that were identified in the preparation of the JCS's can be summarised as:

- Infrastructure including sustainable transport
- Employment provision
- Green Infrastructure
- Sub-Regional Facilities
- Directions of Growth and the longer-term growth of Northampton, including the need to avoid coalescence

It is considered that the cross-boundary issues that were previously identified and considered remain relevant to North and West-Northamptonshire and the preparation of the Strategic Plans. The NN JPDU and partner LPAs (and future NN Unitary authority) will continue to work with West Northamptonshire to ensure these and other relevant issues are addressed through the preparation of the Strategic Plans and the evidence base that informs them. As referenced above, whilst the timescale for plan-preparation is different, the aligned end dates should support this process.

The longer-term growth of Northampton was considered during the preparation of the NN JCS. Whilst this is not explicitly referenced in the Issues document, it is considered that this will be a key cross-boundary issue for consideration in the Strategic Plans and will link to the development and testing of spatial options. The NN JCS recognises this issue at para 1.14: "The Joint Core Strategy does not identify any housing or other development specifically related to meeting objectively assessed needs for adjoining areas and vice versa as it has been confirmed that this is not necessary before 2029. For the period post-2029, options outside of the West Northamptonshire boundary area may need to be tested alongside others for meeting Northampton's longer term development needs. Through the duty to co-operate and co-ordination of plan making, the respective local planning authorities will work together to positively address this issue in reviewing future Local Plans."

It will be important to consider sustainable transport links between West and North Northamptonshire, notably the A45 between Wellingborough and Northampton and the A43 between Northampton and Kettering. Improvements to the A45 and the A43 between Northampton and Kettering are identified in the NN JCS and the recently published North Northamptonshire Investment Framework. Future retail strategy and hierarchy will be an important cross-boundary consideration through the development of the Strategic Plans.

In relation to the previously identified issue of the longer-term growth of Northampton post 2029 the JPDU fully supports the need to consider all of the spatial options set out in the next steps section of the issues document. Recognition within the issues document that the development of spatial options will need to take account of a range of influences such as the plans of neighbouring Councils is also welcomed.

It is noted that the Natural and Built Environment section of the document references 'Biodiversity Net Gain'. It is considered that, in accordance with the government's '25 year Plan to Improve the Environment' and the stated aims for the Oxford to Cambridge Arc, the plan should be seeking to achieve an overall net environmental gain. The impact of future growth on the Upper Nene Valley Gravel Pits Special Protection Area will also be a key consideration in developing the Strategic Plans.

Should you have any queries regarding this response, please do not hesitate to contact me or another member of the JPDU.

Yours sincerely

Simon James

Planning Policy Manager
North Northamptonshire
Joint Planning and Delivery Unit