

**Raunds Draft Neighbourhood Development Plan –  
Consultation Responses – Date 19 October 2015 to 1 December 2015**

Ref. No.	Consultee Name	Pg. No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Town Council Comments	Amendments to NP
1	Stanwick Parish Council				S	SPC support the plan	Noted	No amendments
2	Little Addington Parish Council					Little Addington Parish Council are concerned about the visual impact development at Raunds has already had and apparent lack of effort to conceal the impact from local communities.	Noted	No amendments
10	Environment Agency					<p>Pleased to see that in 3.10 the policies to promote good design and protect green infrastructure will be used to assess development proposals for their environmental impacts.</p> <p>Agree with the conclusion that a strategic environmental assessment is not required.</p> <p>Hogs Dyke flows through the centre of Raunds until it meets the River Nene near to Little Addington and parts of land fall with Flood Zone 2 and so have a medium probability of flooding.</p> <p>This should be born in mind when considering future residential development from infill sites or town centre development.</p>	Noted	No amendments
3	Clive Fletcher Historic Places					<p>Thank you for consulting Historic England on the Neighbourhood Plan for Raunds. We do not have any detailed comments to make on the plan at the present time, however, if there are any specific issues that you feel would merit our closer involvement please advise us of this.</p> <p>The policy considerations relating to the historic environment are dealt with extensively in the National Planning Policy Framework (NPPF) and its associated Guidance (NPPG). For general</p>	Noted	No amendments

						advice on neighbourhood planning and the historic environment, we refer you to the Neighbourhood Planning section of the Historic England website: <a href="https://www.historicengland.org.uk/advice/hpg/historic-environment/neighbourhoodplanning/">https://www.historicengland.org.uk/advice/hpg/historic-environment/neighbourhoodplanning/</a> ".		
4	ENC	8	1.11		C	<b>Paragraph 1.11</b> – Minor/ editorial changes – Repeat of paragraph 1.10	Council accept the suggestion	Paragraph 1.11 deleted.
4	ENC	10	3.4		C	<i>in all likelihood...</i> " should be deleted from the 1 <sup>st</sup> sentence.	Council accept the suggestion	Paragraph 3.4 amended to remove " <i>in all likelihood</i> "
4	ENC	12	3.9		C	It may be better to redraft the final sentence of paragraph 3.9 to ensure that the Plan remains positive; e.g. " <i>Given the current quantum of development commitments, it is anticipated that any further growth during the Plan period to 2031 would be limited to small scale <del>windfall</del> (infill) development.</i> "	Council accept the intent but feel windfall should be replaced with infill	Final sentence of Para 3.9 amended to read " <i>Given the current quantum of development commitments, it is anticipated that any further growth during the Plan period to 2031 would be limited to small scale <del>windfall</del> infill development.</i> "
4	ENC	13	4.3		c	Minor/ editorial changes – Suggested factual revision to paragraph, in the interest of clarity:  " <i>For Raunds, the current adopted strategic Local Plan policies are contained in the following documents:</i> <ul style="list-style-type: none"> <li>• <i>North Northamptonshire Core spatial Strategy, adopted June 2008; and</i></li> <li>• <i>East Northamptonshire District Local Plan, adopted November 1996 (saved policies).</i>"</li> </ul>	Council accept the proposed amendment	Paragraph 4.3 amended as follows:  " <i>For Raunds, the current adopted strategic Local Plan policies are contained in the following documents:</i> <ul style="list-style-type: none"> <li>• <i>North Northamptonshire Core Spatial Strategy, adopted June 2008; and</i></li> <li>• <i>East Northamptonshire District Local Plan, adopted November 1996 (saved policies).</i>"</li> </ul>
4	ENC		4.5		c	<b>Paragraph 4.5</b> – Editorial changes/ update, to reflect ENC decisions regarding "strategic" and "non-strategic" policies:  " <i>National planning policy (NPPF paragraph 185) requires that the Neighbourhood Plan should be in general conformity with adopted strategic policies, but should take precedence of existing non-strategic policies. On 16 November 2015, East Northamptonshire Council agreed a distinction between strategic and non-strategic</i>	Council accept the proposed amendment	Paragraph 4.5 amended as follows:  " <i>National planning policy (NPPF paragraph 185) requires that the Neighbourhood Plan should be in general conformity with adopted strategic policies, but should take precedence of existing non-strategic policies. On 16 November 2015, East Northamptonshire Council agreed a distinction between strategic and non-</i>

						<i>policies, and the Neighbourhood Plan will fit within the framework defined by the strategic policies, but will supersede those deemed to be non-strategic."</i>		<i>strategic policies, and the Neighbourhood Plan will fit within the framework defined by the strategic policies, but will supersede those deemed to be non-strategic."</i>
	ENC	18	5.0		c	<p><b>Overall comment</b></p> <p>Apart from the overall vision for the town, "to enable Raunds to develop as a vibrant, successful, pleasant rural market town; where people feel safe to live", it is noted that the focus for the Plan is employment/ economic development.</p> <p>While the overall objectives are broader, it is appropriate for the Plan to adopt an approach whereby no further development land allocations are proposed given the current quantum of commitments for new residential and employment related development around the town.</p>	The comment is noted.	No changes to make comment only
4	ENC	20	Section 6		C	<b>Objective 1</b> – While there is no requirement for the Neighbourhood Plan to allocate further land for housing, the opportunities for delivering Objective 1 on the basis of small scale windfall developments within the urban area is limited.	The comment is noted	No changes required
5	NCC Lesley Mather Architectural Officer	19	Para 5.3		C	<b>Objective 7 to include historic environment designations</b>	Council accept the proposed amendment and changes are made.	Amend Paragraph 5.3 as follows: "Objective 7 To ensure that the Raunds Neighbourhood Development Plan promotes sustainable development for future generations by protecting key environmental assets (e.g. green spaces and landscapes, natural and historic environment designations and taking account of constraints."
4	ENC	20	Para 6.2		c	<b>Paragraph 6.2</b> – Minor/ editorial changes – "...to cater <u>for</u> the demand from smaller households..."	Council accept the proposed amendment and changes are made.	Amend Paragraph 6.2 as follows: "...to cater <u>for</u> the demand from smaller households..."
4	ENC	20	6.4	R1	C	<b>Paragraph 6.4/ policy R1</b>  Policy R1 focuses upon housing size and types. This is appropriate, given that it provides	Council considered that policy R1 does not adequately reflect the council's policy of ensuring	Paragraph 6.4 amended to add additional sentence as follows: "In recognition of the likely need for smaller dwellings and for the need for

						<p>additional local direction to the overall Joint Core Strategy (JCS) standards set out in Policy 30.</p> <p>However, it is considered that the 1<sup>st</sup> and final sentences of Policy R1 are factual information rather than policy direction, so should become supporting text (move to paragraph 6.4). Also, it is advisable to remove specific cross references to JCS paragraphs 9.26 and 9.27, as may well change before that Plan is adopted. It is also advisable to refer simply to "the Local Plan", in order to "future proof" Policy R1. Suggested amendments are set out below</p> <p>Paragraph 6.4: <i>"...both the "affordable" and "market" housing sectors. In recognition of the likely need for smaller dwellings and for the need for flexibility, the Raunds Neighbourhood Plan supports the Local Plan which indicates that, for new developments, a significant proportion (generally at least 70%) of small and medium sized properties (1-3 bedrooms) will be provided. The Neighbourhood Plan also supports Local Plan objectives, to ensure that a balanced housing stock is secured."</i></p> <p><i>"R1 – ENSURING AN APPROPRIATE RANGE OF SIZES AND TYPES OF HOUSES Affordable and market housing should be delivered in accordance with the size, mix and tenure standards set out in the Local Plan. Proposals for a higher proportion of larger (4+ bedroom) dwellings should be supported by evidence in relation to the existing housing stock and the local housing market."</i></p>	<p>that Raunds has a suitable stock of larger housing and therefore the policy has been rewritten in its entirety.</p>	<p><i>flexibility, the Raunds Neighbourhood Plan supports the Local Plan which indicates that, for new developments, a significant proportion (generally at least 70%) of small and medium sized properties (1-3 bedrooms) will be provided. The Neighbourhood Plan also supports Local Plan objectives, to ensure that a balanced housing stock is secured."</i></p> <p>Policy R1 amended to read as follows:</p> <p>"Affordable and market housing should be supported by evidence in relation to the existing housing stock and the local housing market."</p>
4	ENC	22	6.9	R1	C	<p><b>Paragraph 6.9</b></p> <p>Paragraph 6.9 is considered to be sound and appropriate. However, it may be helpful to also include a cross reference to Local Plan (JCS) Place Shaping Principles.</p> <p>The final sentence appears to imply that the Town Council will take over the determination of planning applications. It is suggested that the</p>	<p>Council felt it not appropriate to list all design standards as this could change in the lifetime of the plan so a catch all is added.</p>	<p>Amend final sentence of Paragraph 6.9 as follows: 2There are a number of standards that can be used to help produce good design (e.g. Building for Life 12 and Secured by design 2014: Housing Guide) Applicants will be expected to use these and other relevant planning standards"</p>

						final sentence be redrafted, as follows: " <i>These standards provide 'best practice' in putting forward detailed proposals. Developers should work closely with East Northamptonshire Council, the Town Council and community groups in 'place shaping' future development schemes.</i> "		
6	Northants Police	22		R2		<p>Welcomed that RTC highlight the link between good design and security.</p> <p>Note that RTC should also reference the Northamptonshire Supplementary Planning Guidance (Planning Out Crime) adopted Dec 2003.</p> <p>Note that under Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with regard to crime and disorder.</p> <p>Policy R2 h refer to planning out crime SPG.</p>	Council accept the proposed amendment	Amend Policy R2(h) as follows:  <i>h) safe environments that minimise opportunities for crime in accordance with Northampton Supplementary Planning Guidance Planning Out Crime;</i>
4	ENC	22/ 23		R2-3	C	<p><b>Policies R2 and R3</b></p> <p>Policies R2 and R3 both include worthy aspirations in the context of setting local design standards. However, it will be necessary to ensure that these are achievable; i.e. that they comply with the current General Permitted Development Order (GPDO). Also, many of the themes covered in policies R2 and R3 are already addressed through the principles set out in adopted CSS Policy 13 and replacement JCS Policy 8 (Place Shaping Principles).</p>	These comments were noted.	No changes to make
4	ENC	22/ 23		R2-3	C	<p><b>POLICY R4</b></p> <p>It is recognised that there is a strong desire to avoid the loss of residential parking. However, in practice it may be difficult to resist the loss of garages and/ or off-street parking, much of which constitutes permitted development rights (GPDO).</p>	These comments were noted	No changes to make
4	ENC	24			C	<p><b>Paragraph 6.10</b></p> <p>It may be advisable to replace the reference to:</p>	Council accept the proposed amendment	Amend Paragraph 6.10 as follows; <i>"The latest version of the Local Plan "</i>

						"The latest version of the North Northamptonshire Core Strategy" with "The Local Plan", to "future-proof" the Neighbourhood Plan.		
7	NCC Lesley Mather Architectural Officer	25		R5	C	<p><b>Policy R5</b></p> <p>B) "enhance the natural <i>and historic</i> environment"</p> <p>C) promoting connectivity this could involve connecting Marsh Lane a protected open space with the Medieval settlement of West Cotton and Mallows Cotton deserted medieval village with appropriate signage.</p>	<p>Council accept the proposed amendment</p> <p>This will be added to policy R21</p>	<p>Amend Policy R5 as follows</p> <p>B) "enhance the natural <i>and historic</i> environment"</p> <p>Add additional criterion to Policy R21 after:  <i>"the following proposals will be supported:</i>  k) <i>Connecting Marsh Lane a protected open space with the Medieval settlement of West Cotton and Mallows Cotton deserted medieval village with appropriate signage."</i></p>
4	ENC	25		R5	c	<p><b>Paragraph 6.12/ POLICY R5(a) – OPEN SPACE PROVISION</b></p> <p>It may advisable to revise references for East Northampton Council Open Space Supplementary Planning Document, to read: "<i>East Northampton Council Open Space Supplementary Planning Document (Adopted November 2011) and any subsequent updates or revisions</i>", in order to "future-proof the Neighbourhood Plan. Also, it should be noted that there will be few opportunities to apply Policy R5 in practice, as all significant development sites in/ around Raunds are already committed and further development will be limited to small scale and windfall development schemes within the existing urban area.</p>	<p>Council accept the proposed amendment</p>	<p>Amend Paragraph 6.12 and R5(a) to read:</p> <p>"East Northampton Council Open Space Supplementary Planning Document (Adopted November 2011) and any subsequent updates or revisions"</p>
4	ENC	29		R6		<p><b>POLICY R6 – PROTECTED OPEN SPACES</b></p> <p>It is noted that the proposed Protected Open Spaces (Figure 5) <b>include land at Smithfield Place (site 24). East Northamptonshire Council, the current landowner, has considered the role of this 0.13ha site and do not consider that it has any significant function as public open space that is worthy</b></p>	<p>Council not to accept the proposed amendment. The local green space site assessment identified the reasons why this site is to</p>	<p>No amendments to make.</p>

						<b>of retention. Accordingly, it is argued that this proposed Protected Open Space should be deleted.</b>	remain in the Neighbourhood Plan.  A justification has to be included as to why the Council does not agree	
	Roxhill	29		R6		<b>Site 26 should be removed</b>	Council do not accept the proposed amendment  A justification has to be included as to why the Council does not agree	No amendments to make
4	Enc	26		R7	C	<b>POLICY R7 – LOCAL GREEN SPACES IN RAUNDS</b>  <i>“Their development for uses other than uses compatible with their openness will only be permitted in very special circumstances” – What are these “very special circumstances?”</i> . <b>It may be best to adapt NPPF paragraphs 81 and 89 to set out the special circumstances where “uses other than uses compatible with their openness” could be permitted. It should also be noted that the detailed assessment for Local Green Spaces (well summarised in Appendix 2) should be clearly published as a key part of the evidence base for the Plan.</b>	Assessment of open spaces. (Kirkwells to be asked to supply)  The table in Appendix 2 needs expanding by the Town Council with regards to why the site is seen to be demonstrably special. This has to be done with local knowledge.  A detailed local green space site assessment has been carried out and is attached as a separate document as part of the evidence base for the Neighbourhood Plan.	Paragraphs 81 and 89 These special circumstances include: <ul style="list-style-type: none"> <li>• provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Local Green Space</li> <li>• the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</li> <li>• the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</li> </ul> Development on local green spaces may be allowed when: Opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
4	ENC	30		R8	C	<b>POLICY R8</b>  The identification of specific community facilities provides a useful local iteration of the overall approach to the protection of existing facilities set out in adopted CSS Policy 13 and replacement	Members noted the comment	No changes to make.

						JCS Policy 7. However, it should be noted that material considerations must also conform to national policy (NPPF) and permitted development rights.		
11	Methodist Church	30		R8	C	<i>Policy R8: Protecting existing community facilities and buildings. As one of the buildings listed, we see that this affects possible future decisions regarding our building. Whilst we have no plans to move from the building in the foreseeable future, potential restrictions or requirements regarding potential changes (improvements) could have a significant financial implication for the congregation. However, as the building has been identified as an asset within the community, we hope that this means that we will receive positive responses if/when we seek any grants from local government etc to improve the building for community usage</i>	Members reviewed and considered the comments.  A letter will be written to Liz Dunning to explain that this is not the same as becoming a listed building. But that such a designation is a material consideration when determining a planning application.	No changes to make
4	ENC	32	6.17		C	<b>Paragraph 6.17</b>  With regard to references to the adopted and replacement Core Strategies, it would be better to refer to the: <i>"Spatial development strategy set out in the Local Plan, which defines Raunds as being a focal point for development, providing a strong service role for the local community and surrounding rural areas. Development will be directed towards supporting town centre regeneration and the retention of local services."</i> [This text provides a summary of the adopted and replacement development strategies for Raunds]	Council to agree to the amendment	Amend Para 6.17 now 6.18 to read:  <i>"Spatial development strategy set out in the Local Plan, which defines Raunds as being a focal point for development, providing a strong service role for the local community and surrounding rural areas. Development will be directed towards supporting town centre regeneration and the retention of local services."</i>
	Methodist Church	32			c	<ul style="list-style-type: none"> <li><i>Objective 4: to encourage and protect the viability and vitality of the Town Centre. We see that our chapel falls in the middle of the Primary Shopping Area. We appreciate the opportunities this provides for the chapel in terms of interacting with the community. Concerns we would have would be related to limitations, restrictions or requirements in terms of the frontage and any changes we might feel we'd like</i></li> </ul>	The comments were considered and noted as above	No changes were required

						<p>to make. Also, although we have a small car park (maximum 4 cars), a number of our less-mobile users park on Brook Street to access the lower level. Limitations on parking could have an adverse effect on these people.</p>		
	ENC	33		R9	C	<p><b>POLICY R9 – DEVELOPMENT IN RAUNDS TOWN CENTRE</b></p> <p>Development management criteria are considered to be relevant and appropriate to ensure that town centre development is delivered in an appropriate manner. The final Policy R9 paragraph sets out a 70% A1 retail threshold. This would require further justification, specifically:</p> <ul style="list-style-type: none"> <li>• Would this relate to No of units or length of the total ground floor frontage for main town centre uses?</li> <li>• While it may be appropriate to focus upon the role of retail within the primary shopping area, it must be borne in mind that national policy requires that Local Plans and/ or Neighbourhood Plans should promote competitive town centres that provide customer choice and a diverse retail offer (NPPF paragraph 23)</li> </ul> <p>Having considered Raunds Town Council's recent Case Study – "The impact of statutory instrument 596, The Town and Country Planning (General Permitted Development) (England) Order 2015, on the High Street Raunds", it is noted that just over 40% of the proposed Primary Shopping Area is currently A1 retail (including vacant units), both in terms of retail frontage length and Nos of units/ businesses. Therefore, it is considered that the proposed 70% threshold is unlikely to be achievable/ deliverable. A focus upon retaining at least 40% retailing within the Primary Shopping Area would be more likely to represent a realistic, deliverable baseline standard. This should be</p>	<p>Council considered this and agreed with the principle.</p> <p>This policy is to be re-worded in the light of this comment and the comment below.</p>	<p>Policy R9 final paragraph amended to read as follows:</p> <p><i>"Within the prime shopping areas defined in figure 6 at least 70% of the existing stock of ground floor commercial space should remain in non-residential use."</i></p>

						referred to within paragraph 6.19.		
4	ENC	33		R9	C	Furthermore, it must be questioned whether the narrow focus upon A1 retail uses (over and above other main town centre uses) is appropriate. The NPPF does <b>not</b> place a “premium” upon retail at the expense of other main town centre uses, even within Primary Shopping Areas. Instead, it seeks to deliver <b>competitive</b> town centres, customer choice and diversity (paragraph 23), with reference to resilience, viability and vitality. The underlying theme of NPPF paragraph 23 (and Planning Practice Guidance) is securing a realistic range of roles and functions for the town centre. It is therefore considered that a focus upon A1 uses alone does not accord with the spirit of the national town centre policies.	Considered through amendment above.	Amended as above
4	ENC	33		R9	C	<b>Suggested revisions to final section of Policy R9</b>  “Within the primary shopping area, as defined by Figure 6 [NB Policy R9 reference to Figure 5 needs to be amended to Figure 6], proposals which lead to the permanent loss of retail units should be supported by evidence to demonstrate that their continued retail use is no longer viable, or that an alternative use would positively enhance the viability and vitality of the town centre.”	Considered and will be amended but with commercial instead of retail.	<i>Final Paragraph of R9 amended as follows:</i>  “Within the prime shopping areas defined in figure 6 at least 70% of the existing stock of ground floor commercial space should remain in non-residential use. Proposals which lead to the permanent loss of commercial units should be supported by evidence to demonstrate that their continued commercial use is no longer viable, or that an alternative use would positively enhance the viability and vitality of the town centre.”
4	ENC	36		R10-12	C	<b>POLICY R10-R12</b>  Policies R10-R12, provide a good indicative list for potential regeneration projects. This may prove to give some transparency for identifying priority projects for the town if/ when Community Infrastructure Levy is introduced (25% of CIL funding arising from new developments within the Parish of Raunds allocated to the Town Council).	Council to note the comment	No amendments to make.
8	Residentt	36		R10	C	<b>POLICY R10</b>  Traffic and Transport in Raunds, I would have		Policy R10 amended to include additional bullet point in list as follows:

						<p>liked to see the crossroads junction of Butts Road, Park Road, Manor Hill and Ponds Close included. This is a very wide junction to cross with lots of vehicle movements at certain times of the day. Frequently slow crossers such as the elderly, disabled and mothers with walking toddlers, find themselves still in mid-road when a car comes into sight around a corner. Middle of the road bollards would allow people to deal with each side of the road separately instead of having to negotiate the whole width at one time.</p>	<p>Considered and agreed</p> <p>Hill Street Junction will be added to the list of suggested schemes under policy R10.</p>	<ul style="list-style-type: none"> <li>Junction improvements to Butts Road, Park Road, Manor Hill and Ponds Close to facilitate pedestrian safety</li> </ul>
4	ENC	36		R11	C	<p><b>Paragraph 6.24</b></p> <p>It may be helpful to include a cross reference to East Northamptonshire Council's Shop Front Design SPD, adopted January 2011: <a href="http://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=758&amp;fileID=2655">http://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=758&amp;fileID=2655</a>. This should complement Policy R11, by providing additional detailed guidance.</p>	<p>Considered and agreed.</p>	<p>Additional sentence added to Paragraph 6.24 now 6.25 as follows:</p> <p><i>"East Northamptonshire Council's Shop Front Design SPD, (adopted January 2011) provides further guidance."</i></p>
4	ENC	39		R13	C	<p><b>POLICY R13 – PROTECTING LOCAL EMPLOYMENT SITES</b></p> <p>Local employment sites listed within Policy R13 should be shown on the policies map as zonal designations/ land allocations.</p> <p>Also, it would be difficult to apply the standards relating to B8 uses, whereby at least 20% of on-site jobs should be office based. In reality, there would always be a significant ancillary element of office jobs forming part of any warehouse or logistics development, although it would not be possible to set a requirement for "ancillary" jobs. It may be appropriate to include reference to B8 development as a source for new ancillary office jobs within the supporting text.</p> <p>Policy R13 also includes reference to the national (NPPF paragraph 26) threshold for main town centre uses (2500m<sup>2</sup>), with reference to hotel/leisure uses. Of all recently consented A1 superstore schemes, only Sainsbury's, Cattle</p>	<p>Council agreed. A map of local employment sites will be added to the plan</p> <p>Council to retain this policy as is</p>	<p>A map of employment sites included.</p> <p>No amendment to make.</p>

						<p>Market, Market Road, Thrapston (<a href="http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=11/01234/FUL">http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=11/01234/FUL</a>) at 3341m<sup>2</sup>, would be <b>above</b> the national impact test threshold. As part of the emerging Four Towns Plan, the Council is looking to set a <b>local</b> threshold for requiring an impact test for main town centre uses. The Council will be able to advise further as this work is taken forward.</p> <p>With regard to the final section of Policy R13, it is considered that the wording is overly restrictive; i.e. <i>"approval for uses outside of the above will <u>only</u> be permitted..."</i>. It may be appropriate to re-word this part of the policy as follows: <i>"Planning permission for alternative uses to 'B' class employment will be permitted, where it could be demonstrated that:"</i></p>	Council not to adopt the proposed amendment	No amendment to make
16	Roxhill	39		R13		<i>R13 requirement for 20% of office jobs on b8 site should be removed</i>	Noted	No amendment to make
4	ENC	39		R13	C	<p>With regard to the final section of Policy R13, it is considered that the wording is overly restrictive; i.e. <i>"approval for uses outside of the above will <u>only</u> be permitted..."</i>. It may be appropriate to re-word this part of the policy as follows: <i>"Planning permission for alternative uses to 'B' class employment will be permitted, where it could be demonstrated that:"</i></p>	Considered but no amendment to be made	No amendment
4	ENC	40		R14-15		<p><b>Policies R14 and R15</b></p> <p>There are no fundamental concerns with either policies R14 or R15, except that these appear to simply restate existing Local Plan policies.</p> <p>However, Policy R15 refers to developments <i>"that do not lead to any significant adverse impacts"</i>. To strengthen the policy, it may be helpful to include specific criteria as to what could be regarded as representing a "significant impact".</p>	Considered and amendment proposed.	Amend Policy R15 to read as follows:  <i>"...that do not have a detrimental impact on the amenity of neighbouring properties"</i>
16	Roxhill	40		R14		<b>POLICY R14 SHOULD BE REMOVED</b>	Considered no amendment suggested	No amendment to policy

4	ENC	40		R16		<p><b>POLICY R16</b></p> <p>Policy R16 is generally sound and robust, although it should be noted that there is a potential contradiction with Policy R13, which appears to be seeking the retention of designated Local Employment Sites for 'B' class employment uses.</p>	Council noted the comments	No amendments to be made
9	NCC Lesley Mather Architectural Officer	40/41		16-17	c	<p><b>R16</b> agree with the promotion and enhancement of the towns historic assets</p> <p>f) Agree with proposals to link attractions, these could involve historic assets both scheduled monuments listed building and those of local interest.</p> <p>h) this could link with the Medieval settlements of West Cotton and Mallows Cotton.</p> <p><b>R17</b> Objective 7: Promotes sustainable development for future generations by protecting key environmental assets this should also include <i>historic environment designations</i>. Page 41</p> <p><b>Policy R17</b> Emphasise that Green Infrastructure should also include consideration of the Historic Environment. Agree with the proposals with the caveat that they will not have a detrimental impact on the historic environment Page 41</p> <p><b>Policy R18</b> Agree with the proposals with the caveat that they will not have a detrimental impact on the historic environment. Page 42</p> <p>6.32 Raunds has 25 Listed Buildings and 4 scheduled monuments. Page 42</p> <p>R21 enhancement and improvement must also consider the impact on the historic environment.</p>	Considered and amendments agreed as detailed here.	<p>Amend Objective 7 to include "<i>historic environment</i>"</p> <p>Add extra sentence to Policy R17 as follows:</p> <p><i>"Proposals will demonstrate that there is no detrimental impact on the historical environment"</i></p> <p>Add extra sentence to Policy R18 as follows:</p> <p><i>"Proposals will demonstrate that there is no detrimental impact on the historical environment"</i></p> <p>Paragraph amended.</p> <p>Sentence added to R21 to consider impact on historic environment.</p>

						<b>POLICY R16</b>	C) Remove reference to Warth Park.  B) Hotel/Leisure users at Warth Park strategic site (north of meadow lane)	Policy R16 C) amended to remove reference to Warth Park  Policy R16 b) amended to include“ <i>(north of meadow lane)</i> ”
4	ENC	41	6.3	17-18	C	<b>POLICY R17-R18</b>  It is assumed that the green infrastructure network, referred to in Policy R17 will be shown on the overall policies map that should be prepared to accompany the Neighbourhood Plan (“ <i>map x</i> ”).  While policies R17 and R18 are basically sound, it is unclear how far these offer any additional direction over and above Local Plan Green Infrastructure policies (i.e. CSS Policy 5 and replacement JCS policies 19 and 20).	Considered and agreed that Kirkwells will be asked to provide a policies map  Have you a map detailing all Green Infrastructure in designated area for Kirkwells to reproduce. If not policy may need rewording. A Green Infrastructure Study is a major piece of work	<b>Suggested amended wording</b>  The green infrastructure network within the Parish will be protected and enhanced. Proposals will demonstrate that there is no detrimental impact on the historical environment or any adverse impact, either alone or cumulatively on the Special Protection Area, Site of Special Interest or RAMSAR site which lies adjacent to the Town and forms a part of the sub-regional green infrastructure corridor.  Proposals will be assessed for the contribution they make to the following:  We have agreed to reword the policy.
12	Natural England	41-		17-20	C	Welcome policies R17 and r18  Welcome policy R20 (but note Upper Nene Valley Gravel Pits SSSI and SPI (not Stanwick Lakes)  Policy R20 has a risk that new routes have an impact on the SSSI and SPA therefore a Habitat Regulations assessment may be required at a later stage.  R16 and R21 could have the words <b>subject to the requirements of policy r20 added.</b>  Subject to the amendments of policies r16/20/21 the plan does not have a significant impact on sites they have a duty to protect.  Habitat regulations assessment a site screening exercise should be carried out to address the impacts of the policies in the plan against the	Considered amendment agreed.  Considered advice from Kirkwells to be sought  Amendment agreed  The comments of Natural England were noted	Policy R20 amended to read “ <i>Upper Nene Valley Gravel Pits</i> ”  Remove from Policy R20: “ <i>and when they do not by reason of harm to local wildlife, landscape or views damage the public enjoyment of this area.</i> ”  Policies R16 and R21 amended to include “subject to the requirements of r20”.

						Upper Nene Valley Gravel pits SPA AND Ramsar Site.		
4	ENC	41	6.3	19	C	<b>R19 – LOCALLY LISTED BUILDINGS</b>  It would be useful if the locally listed buildings specified in Policy R19 could be shown on the policies map as points.	Considered and agreed	Policies map amended
	Methodist Church	42		19	c	<i>R19: Locally listed buildings.</i> We assume that the 'Wesleyan Chapel' refers to the Methodist Church (there is no distinction between Wesleyan and Primitive Methodist since the Deed of Union of 1932). As in our comments regarding R8, our concerns will be the impact on decisions about the use and development of our building, in particular the financial impact this could have. Whilst we appreciate this is a heritage building, our primary interest is whether it is fit for contemporary usage. This is not a new attitude; the changes in the interior over 20 years ago, and the addition of a good kitchen in the last 10 years shows that the church seeks to adapt to the needs of the congregation and community. We know from our friends in other churches in the area that 'heritage' restrictions can limit our options and/or put up the costs for a congregation significantly which enhance the life and usage of the building, these will be supported by local government, and any additional costs related to the requirements/restrictions of these plans are off-set by financial assistance.	This follows on from previous queries answered	
4	ENC	42	6.33	20	C	<b>Paragraph 6.33/ POLICY R20</b>  Factual correction – The correct name/ title for the Stanwick Lakes SPA/ SSSI is the "Upper Nene Valley Gravel Pits Special Protection Area (SPA)/ Ramsar site", which is also designated a SSSI and incorporates Stanwick Lakes Country Park. References should be amended accordingly.	Considered and agreed	Policy R20 amended to read "Upper Nene Valley Gravel Pits"
4	ENC	41		21	C	<b>POLICY R21 – MOVEMENT AND CONNECTIVITY</b>  It would be useful if the specific projects listed at criteria (d) –(j) are shown on the policies map, as	Considered and agreed	Kirkwells to amend

						points or linear information, as appropriate.		
4	ENC	44	6.38		C	<p><b>Paragraph 6.38</b></p> <p>It is suggested that the following text be inserted at the beginning of paragraph 6.38: <i>"Once East Northamptonshire Council formally introduces CIL, the RNDP will enable the Town Council..."</i>; in order to provide additional clarity.</p>	Considered and agreed	Paragraph 6.38 amended to include:  <i>"Once East Northamptonshire Council formally introduces CIL, the RNDP will enable the Town Council..."</i>
4	ENC	44		22	C	<p><b>POLICY R22 – DEVELOPER CONTRIBUTIONS AND COMMUNITY INFRASTRUCTURE LEVY</b></p> <p>It may be appropriate to move the specific projects put forward in policies R10-R12, into the final sub-section of section 6.0 ("Developer Contributions and Community Infrastructure Levy"). This would help to clearly demonstrate clearly that CIL will be an important mechanism for delivering individual regeneration projects.</p> <p>It is also questioned whether Policy R22, as written, is compliant with the relevant CIL Regulations. East Northamptonshire Council will be able to advise further as to any re-drafting that would be needed on order to make the policy compliant with the Regulations.</p>	Considered and ENC will be asked to advise further on this	
4	ENC	44			C	<p><b>Appendix 1</b></p> <p>It is noted that SEA screening has been included at Appendix 1. Similar screening opinions should be undertaken regarding Habitat Regulations Assessment and Equalities Impact Assessment, using the respective toolkits that are available through East Northamptonshire Council's Neighbourhood Planning web page: <a href="http://www.east-northamptonshire.gov.uk/neighbourhoodplanning">http://www.east-northamptonshire.gov.uk/neighbourhoodplanning</a>.</p>	Kirkwells to ADVISE  Will look through documents and complete	
11	Resdient	All			C	<p><u>The Raunds Community and of its move from the Industrial to the Information Age.</u> A) The Town is well served by Cable so communications are good rising to excellent.B) Small but numerous businesses will develop in homes using</p>	Members reviewed these comments and agreed that there were many worthy aspirations amongst them.	No amendments

					<p>increasingly efficient IT. C) More "Leisure Time" facilities called for to serve the elderly and young population</p> <p><u>2) St Peters Church.</u> A) Adequately funded and cherished this ancient structure could be the Town's major tourist draw. B) The paintings on the north side of the Nave are considered among the finest in England. C) Additional car parking serving St Peter's visitors called for in the Upper Memorial Garden. D) The West End of the building is a candidate site for a Town Museum</p> <p><u>3) The Upper and Lower Memorial Gardens.</u> A) At present maintenance of this area is a drain on the Town's resources. B) Could be converted into an open-air forum for hire. C) There are 20 uses to which such a facility might be put to generate income for the Town</p> <p>4) The south facing slope from Meadow Lane to Hog A) The Archaeologists are investigating this entire area to an application to erect Warehouses. B) Given per the Town's warehousing area will equate to 80% of domestic housing area! C) The north to south slope for extensive groundwork particularly in the middle E) The scene will be ugly beyond compare. Raunds equate to Slough in Berkshire. D) There is a call for allotments on this slope given the intended 40% pc increase by 2030.</p> <p>5) Hogs Dyke Valley below Smith's Bridge on London Road.A) Possible site for Lake and Park as a natural extension of Amos Lawrence field.B) A Dam will create a crossing point between Meadow Lane and Stanwick Rd. C) Lake will provide water for Allotments to the North.</p>	<p>However the comments in themselves did not require any policy alterations.</p>	
					<p>6) Amos Lawrence field to extend to a Park with Lake and BMX Track. A) Create a Lake and Park at the foot of Amos Lawrence field employing the spoil on B) and C) below. B) Create level and well drained pitches for Soccer/Rugby/Hockey/Tennis in Amos Lawrence. C) Create a competition standard BMX track to</p>	<p>Members reviewed these comments and agreed that there were many worthy aspirations amongst them.</p> <p>However the comments in themselves did not require</p>	<p>No amendments</p>

					<p>compete with Peterborough/Leicester/Milton Keynes.</p> <p>7) The site of Smiths Brickyard and filled clay-getting pits to the east of the Town. A) Green Field sites are being developed for housing to the North and South of the Town, whilst this circa 15 hectare Brown Field site is repeatedly overlooked. WHY!! when 2 schools are close at hand. We suggest that it is time that the Townsfolk were briefed as part of your wide ranging consultation.</p> <p>8) The Library extension as a Town Museum. A) There appears to be a call for a Museum, but the problem will be the cost of supervising/manning it. B) The Library is manned by very experienced and able staff well used to dealing with the Public. C) An extension of the Library will cost less than acquiring separate premises</p>	any policy alterations.	
13	Cllr Tony Boto			<p>General comments across a number of policies</p> <p>There are, of course no reasons why an area cannot be defined as a Local Centre in the 4TP and as a protected employment area in the NP so I don't see a problem there.</p> <p>As far as the NP is concerned whilst reference is made in 4.9, 6.17 and elsewhere, I cannot seem to find a definition of what constitutes the "Town Centre". I think is important that the NP clearly shows what the area is that is classified as the Town Centre.</p> <p>I also note that the NP refers to the need for parking improvements in the Town Centre and in Brook Street although there is no mention of potential sites. the 4TP will say nothing on this subject and it will be necessary for the TC to come up with its own proposals (ideally via the NP).</p> <p>In Policy R10, The Square/Marshalls Road/Brook Street junction is seen as needing improvements. I would suggest that the NP shows Hill Street as part of this junction as egress from that part of</p>	<p>Considered. Town centre is primary shopping area this can be clarified.</p> <p>This comment was noted</p> <p>This was considered and agreed under comment from Mrs Edwards.</p>	<p>No amendments</p> <p>No amendments</p> <p>Already agreed</p>	

					<p>the junction is very dangerous and, at times almost impossible.</p> <p>In Policy R19 you show Spire Works as being in Manor Street. Whilst it faces the end on that road it is located in Park Road.</p> <p>I note that the NP does not contain any reference to a fast food takeaway policy (unlike Higham's).</p>	<p>Noted the street name will be amended.</p> <p>Considered but not felt it would be</p>	<p>Policy R19 amended accordingly</p>
14	NCC Heather Webb Principle Project Officer Planning Services				<p><b>Policy R2 (k):</b> I am concerned about this clause, which states that 'any development on the edge of the town should improve access to the countryside'. In particular, promoting access to the Upper Nene Valley Gravel Pits Special Protection Area (SPA)/Ramsar Site/SSSI (erroneously referred to in Policy R20 as the Stanwick Lakes SPA) could have implications for the site's notified features. Natural England has determined that the SPA is already being negatively affected by recreational pressure. The site is the only large accessible natural greenspace in this part of Northamptonshire and as such is much visited by Raunds residents. While I support encouraging people to get out and explore the outdoors I think Policy R2k should be amended to account for the need to protect the SPA from visitor-induced harm.</p> <p><b>Policy R5 (b):</b> It is not clear what is meant by 'promoting a green Infrastructure approach', and how this would be implemented on the ground by Development Management officers reviewing planning applications. I also do not think Policy R5b enhances Policy R17, which deals with green infrastructure in more detail. I would therefore recommend removing R5b altogether.</p> <p><b>Policy R7:</b> Part of Protected Open Space site 26 Land at Meadow Lane is identified as potential development land in the 2011 Raunds</p>	<p>Members were disappointed with the tone of this response.</p> <p>However it was felt that the amendments suggested by Natural England covered the points raised here.</p>	<p>No additional amendments to be made.</p>

					<p>Masterplan. If this masterplan item is to be superseded by the Neighbourhood Plan this should be explicitly stated for clarity.</p> <p><b>PolicyPolicy R17:</b></p> <p>I support the implied intent of the first part of this policy, which states that 'the green infrastructure network...will be protected and enhanced'. However I do not think that this wording can actually be implemented as there is to my knowledge no policy or legal framework through which such large swathes of land can be 'protected'. In the absence of specificity or a means to implement the policy I would recommend this sentence be removed. Clause h regarding electric vehicle charging does not relate to green infrastructure and should be moved to a more appropriate policy.</p>		
					<p>R20: This policy concerns me greatly as I believe it demonstrates a lack of knowledge about the nearby Special Protection Area and implications thereof:</p> <p><input type="checkbox"/> The correct name of the site is the Upper Nene Valley Gravel Pits Special Protection Area (SPA). It is also a Ramsar site under the Convention on Wetlands of International Importance, and comprises most but not all of the Upper Nene Valley Gravel Pits Site of Special Scientific Interest. There is no such site as the 'Stanwick Lakes Special Protection Area'.</p> <p><input type="checkbox"/> As an SPA the Upper Nene Valley Gravel Pits – which includes Stanwick Lakes –is protected under the Conservation of Habitats and Species Regulations 2010, often referred to as the Habitats Regulations. The regulations require that the effects of plans and projects be considered both alone and in combination with effects arising from other plans and projects. I see no evidence that this has been done, and the SEA screening in the draft plan suggests that the Town Council remains uncertain whether a Habitats Regulations Assessment is required (SEA Assessment Criterion #4, page 50). In my view this should have been resolved well before presenting the</p>		

					<p>plan for public consultation.</p> <p><input type="checkbox"/> Any policy regarding the SPA must be consistent with the Habitats Directive and Regulations. The language of Policy R20 is not consistent with the legislation and is therefore unsound. This policy must be rewritten; I would recommend that the Town Council consult with Natural England regarding appropriate wording.</p>		
15	Esme Cushing NCC Principal Transport Planner				<p><b>4.0 Key Issues for Raunds</b></p> <p>This section refers to the planning documents that the Plan must have due regard to. The Northamptonshire Transportation Plan and its supporting daughter documents cover topics such as walking, cycling, public transport and parking and set out the Council's transport policy that the Town Council should have due regard to when writing policies for the plan. All of the documents can be found on our website at: <a href="http://www.northamptonshire.gov.uk/en/councils/ervices/transport/tp/pages/local-transport-plan.aspx">http://www.northamptonshire.gov.uk/en/councils/ervices/transport/tp/pages/local-transport-plan.aspx</a>. We note that Appendix X which will contain the relevant policies from plans referred to in paragraph 4.5 is not currently included in the draft plan so we have been unable to comment on it.</p> <p>Paragraph 4.5 to 4.12 summarises the locally identified issues in Raunds. It is felt however that paragraph 4.11 that deals specifically with highway/ transport infrastructure talks more about solutions rather than the issues themselves.</p> <p>An important element of the Neighbourhood Plan is having the evidence base to support it. For example, where the plan says 'Provide additional town centre parking based on demand', it is expected that recent parking surveys (recording supply and demand) have been carried out to demonstrate that further off-road parking is required. However, it is not clear from the plan</p>	<p>noted that the people and places survey will form part of the evidence base.</p>	<p>Kirkwells to be asked to provide policies map.</p> <p>People and Places information to be supplied to Kirkwells so that it can be included in the evidence base.</p>



					<p>(December 2008). It is the intention of Northamptonshire Highways to consult in 2016 on a revised Parking Standards document.</p> <p>Policy R10 relates to traffic and transport in Raunds. The second paragraph of this policy is 'All development proposals will be expected to demonstrate how they contribute to the creation of safer roads and streets for pedestrian and cyclists'. The NPPF outlines that the safety implications of the development has to be considered, but it has to be proportionate, and that the development only needs to demonstrate a nil-detriment.</p> <p>Policy R16 k) refers to new and improved footpaths. Footpath is a specific term which refers to public rights of way. We would suggest that footway may be the correct term in this context. The rest of the document should also be checked on this basis to ensure consistency and clarity.</p> <p>Policy R18 concerns greening the town. Criteria E) of the policy states that greener cycleways and footpaths (again please see comment above relating to Policy R16 k) regarding the definition of 'footpath') will be prioritised. It is felt that this needs to be clarified further in terms of what it is to be prioritised over and above, and whether that is always appropriate or there needs to be more flexibility in the policy.</p>	<p>Noted</p> <p>Do you want to amend the wording?</p> <p>This was missed I will ask members and advise.</p>	<p>County Council guidance and standards."</p> <p>R16k footpath to be amended to footway</p>
					<p>Policy R21 supports enhancements to existing highway networks and provision of new movement and connectivity. It is felt that the wording of the policy could be made more explicit where it states 'improved links to Raunds <u>and other areas</u>'. In terms of b) the Highways Act 1980 does not impose any statutory duty upon the Highway Authority to provide street lighting.</p> <p>Any street lighting that is to be installed within the limits of the adopted highway for the purpose</p>	<p>and other areas should read and the local area.</p>	

					<p>of lighting the highway must have provision in place with a relevant Lighting Authority for energy and maintenance prior to adoption.</p> <p>Any street lighting that is to be adopted via agreement by Northamptonshire County Council as Highway Authority will attract a Commuted Sum for all future projected costs and will have to comply with the standards and specification for street lighting outlined by the County Council. The Town Council is however able to become a Lighting Authority with responsibility for installation and maintenance of street lighting. If you have any further queries on this please let me know and I will get someone from the street lighting team to get in contact with you.</p> <p>Northamptonshire Highways is generally supportive of enhancing green infrastructure and links to it; however we would raise concerns about the ongoing maintenance cost of certain landscaping and planting along routes (Policy R21 c)).</p> <p>Policy R22 refers to developer contributions. It is worth bearing in mind for future reference that CIL cannot be used for revenue, such as running a bus service, however capital improvements that are required to run a bus service (such as a bus gate for example) could be.</p>		
	Anglian Water				No comments to make on plan		
	Resident				Open space at Hermitage Way should be included in the plan	The local green space assessment did not identify this as a strategic piece of green space.	
	NHS England GP Premises Manager  NHS England – Midlands & East (Central				Typo states that plan covers period to 3031	This is corrected to 2031	Correct on page 13

	Midlands)							
	Highways England					Typo states that plan covers period to 3031	This is corrected to 2031	Correct on page 13
<b>RESPONSES RECEIVED AFTER CLOSE OF CONSULTATION PERIOD</b>								
	Barford					Propose mixed use development of land at rear of Manor School for residential and community use	No changes to make. The council would reaffirm that planning permission has already been granted for over 1060 homes. This exceeds the requirement in the adopted North Northamptonshire Joint Core Strategy for the plan period.	No changes to make
	Wildlife Trust					NOTE RESPONSE RECEIVED IN JULY 2016  Plan needs to include further detail on bio-diversity and ecological matters  The protection of the SPA, SSI Ramsar site should play a prominent role in the Neighbourhood Plan	Proposed that changes already made to plan in light of comments from other consultees ensure tha sufficient protection has been given to the RAMSAR site.  Comments regarding bio-diversity are noted,	No changes to make

## DAVID SHAW *Town Planning Consultant*

5 Port Lane, Castor, Peterborough, PE5 7AP

Tel: 01733 380160. email: david@davidshawplanning.com

RESPONSE TO DRAFT RAUNDS NEIGHBOURHOOD PLAN

On behalf of Roxhill Developments Ltd.

## **Introduction**

Roxhill welcomes the progress being made on preparing a Neighbourhood Plan (NP) for Raunds, and is pleased to provide comments which we hope will be of help to the Town Council in taking forward the current early draft Plan. In particular, Roxhill is keen to underline the inter-relationships between a number of key aspirations, objectives and priorities set out in the draft NP and the direct opportunities to deliver them arising from further potential development in the town. In doing so, this response also highlights a number of ways in which we think the NP can and should be improved to help ensure local priorities are delivered in comprehensive and timely way.

A number of key themes emerge very strongly in the draft NP. These include the aspirations and objectives for an improved quality of open spaces, new and improved green infrastructure, new and improved walking or cycling links to and within the town, and improved recreational opportunities which support aspirations of Raunds to operate as a destination town.

As described in the draft NP, if successfully progressed through examination and referendum the document would form part of the statutory development plan, and the NP is seeking to define a local policy context for decisions and investment over the period to 2031. This period of around 15 years from adoption of the Plan requires a flexible and forward-looking approach if it is to be sound and if it is to be responsive to the wide range of issues and opportunities likely to present themselves over that length of time.

Crucially, more thought should be given to how key objectives might be delivered given the proposed approach to new development as set out in the draft NP which currently identifies no new development sites. While CIL is referred to as a key delivery mechanism (in section 6 of the NP), the likelihood of CIL generating funding for priorities in Raunds is unclear in the absence of a proactive approach to some further development in Raunds.

## **Strategic Context**

A number of important strategic issues set the context for the NP. The emerging Core Strategy sets an ambitious and challenging jobs growth target of 31,100 jobs over the plan period to 2031 and explicitly seeks to reduce out-commuting by creating more job opportunities in the local area. East Northamptonshire is identified as the district within North Northamptonshire “with the poorest balance between jobs and workers....the lowest level of self-containment in commuting patterns, the greatest outflow of commuters and the longest average commuting distances” (submission draft Core Strategy as amended<sup>1</sup>, paragraph 2.33). The draft NP rightly identifies this issue of out-commuting, albeit briefly at paragraph 1.9 and 4.8, and responds to the existing problem of an imbalance between housing and jobs 1 June 2015, Focused Changes to the Pre-Submission Plan. by a decision not to identify any further housing sites in the NP. We believe a more proactive response to this issue would have a range of wider benefits, and these are described below. It seems clear that the extent to which local employment needs are met within East Northamptonshire has actually fallen over recent years. Paragraph 5.3 of the emerging Core Strategy provides a clear statement of the need for action in the NP as well as Core Strategy level. It states:

“The Plan seeks to increase the self-reliance of North Northamptonshire at all spatial scales: from the Housing Market Area as a whole; to the Northern and Southern functional sub-areas; and down to individual settlements. The general approach will be to meet needs as locally as possible”

In this context, the response to employment and job creation in the NP needs further consideration, and a more enabling and positive approach taken. Employment Land and out-commuting At present, the employment land policies seek to protect existing employment sites, including the strategic site at Warth Park (Policy R13). This is welcomed. However, otherwise the draft policy R14 appears to limit any further job creating development in Raunds (B1, B2 or B8) only to previously developed land, or re-use of existing buildings. Such an approach would see very limited, if any, net additional job creation, and so would not respond sufficiently to the need and opportunity to ensure more local job opportunities and reduce the need for people to commute long distances. It is unlikely to be commercially viable to redevelop brownfield land for commercial development in Raunds due to the generally low commercial values in the established employment parts of Raunds. Only the higher values associated with housing are likely to deliver redevelopment.

A more positive approach to additional employment development in Raunds would not only have direct economic benefits, but would also directly support a number of the defined environmental and social priorities and objectives of the draft NP. As explained informally over recent months to local representatives, Roxhill is keen to bring forward a southerly expansion of Warth Park, which would deliver more employment in the town. This in turn would provide a stronger local economy, with benefits to many small businesses providing local services. An expansion would incorporate a retained and much improved Meadow Lane bridleway route as well as other elements of green infrastructure and local connectivity. As currently presented the draft NP proposes a large green space on this land. We support the provision of genuine open space with access to all along Meadow Lane giving improved connectivity between Raunds and the Nene Valley. However the current allocation of the whole of area 26 for open space, we consider, is not justified and would directly frustrate or prevent an expansion of Warth Park. It would also prevent the delivery of a comprehensive and high-quality improvement to Meadow Lane as part of a wider green infrastructure and connectivity strategy. Further comment on this issue is provided below.

On a more detailed issue, the suggestion in Policy R13 that at least 20% of jobs on-site at B8 developments should be office based requires some clarification and justification. While B8 development often includes a quite significant office component, the evidence base to suggest this figure is either necessary or deliverable remains unclear, as does any sense of how it would be monitored or enforced. Furthermore, this policy is not consistent with emerging Core Strategy policy which highlights logistics and distribution employment as a priority for North Northamptonshire. We would recommend that requirement be removed from Policy R13.

### **Open Space, Green Infrastructure and Connectivity**

The clear ambitions to deliver new and improved open spaces, and to better integrate and connect Raunds with the Stanwick Lakes are understood. In order to help enable delivery of these ambitions a revised approach should be taken in the NP. In particular, the proposed new allocation of open space to the south of Warth Park – open space site 26 on Figure 5 – is an extensive area of land currently in agricultural use. It is not considered either deliverable, or appropriate as open space, and the NP should be revised. It is not clear how this site relates to the criteria set in the draft NP of being ‘demonstrably

special' as defined in para 6.16, and also given the site's area which is well in excess of 100 acres, it is not clear what definition of 'not extensive' is applied. It is unclear how this area would be brought forward for use as public open space, how its management or maintenance would be coordinated or funded, and therefore what contribution it would make to the objective of meeting local needs and demands for highquality open spaces. The site is quite different to the majority of other proposed open spaces in both size and character, and further thought should be given to the justification and rationale for that proposed open space allocation. we do not support this proposed open space allocation.

However, Roxhill note the objectives and emphasis given to new open space and recreational facilities, and feels strongly that new development could be brought forward to deliver a wide range of improvements which would directly meet local needs and priorities as presented by the draft NP. For example, open space priorities set out in Policy R5, as well as many of the tourism and connectivity proposals listed in Policy R16 and Policy R21 could be delivered as part of an expansion of Warth Park. Our ideas and masterplan concept is at a relatively early stage, but having had regard to the draft NP, we are currently preparing initial plans for discussion with the Town Council. The emerging concept is centred on a significantly enhanced Meadow Lane route for walkers, cyclists, and equestrians, with new landscaping and other improvements to the connection between the town and the Stanwick Lakes to the west of the A45. We are also aware of aspirations for better linkages between existing recreational facilities in the town, and ideas about new or improved facilities, such as a BMX track.