

1. Introduction

The West Northamptonshire Joint Core Strategy (JCS) as submitted provides a planning framework for the West Northamptonshire area up to 2026. It sets out the long term vision and objectives for the whole of the area and includes strategic policies for steering and shaping development. It identifies locations for strategic new housing and employment and details the infrastructure (such as transport improvements, schools, open space and community facilities) required to support this development. It also defines where development will be limited.

The Joint Core Strategy was submitted to the Secretary of State in December 2012. An independent Planning Inspector, Mr Nigel Payne was appointed to examine the Plan and a series of public hearings were held in April and May 2013.

2. Focus of this consultation

In the light of evidence considered and discussed at the Hearings the Inspector asked the Joint Planning Unit to undertake the following further work:

- To undertake a fresh assessment of the objectively assessed housing needs in the area over the plan period and beyond;
- To prepare a Sustainability Appraisal/ Strategic Environmental Assessment (SA/ SEA) Addendum to address acknowledged shortcomings in the work to date; and
- To assess whether further modifications were required to the JCS in the light of the evidence presented at the Hearings and the outcomes of the additional work.

This additional work has now been completed and the Joint Planning Unit is undertaking a further consultation that concentrates on three key elements:

1) The Proposed Main Modifications: Significant changes to the JCS that are needed to ensure that the Plan is found “Sound” and “Legally Compliant” by the Inspector.

2) The Sustainability Appraisal (SA) Addendum Report and the Habitats Regulations Assessment (HRA) Addendum Report: The SA Addendum assesses the sustainability effects of the Proposed Main Modifications and considers all reasonable alternative sites for strategic development in and around the four main towns in West Northamptonshire. The HRA assesses the likely significant effects of the Proposed Main Modifications on Rutland Water Special Protection Area and Ramsar site and on the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site.

3) Objectively Assessed Housing and Jobs Need: An objective assessment of housing needs in the plan area up to 2026, 2029 and 2031, and the implications for the number of jobs required. The results of the assessment for both housing and jobs needs are set out in the Technical Paper on Objectively Assessed Housing Needs V2 (December 2013)

Representations should be focused on the 3 key elements described above and the specific modifications proposed. They should not revisit existing policies in the JCS which are not subject to proposed modifications as they have already been considered by the Inspector. Representations on this stage of the plan making process must be made on the grounds of “soundness” or “legal compliance” as explained below in order to be considered. The representations will be considered alongside those already under consideration by the Planning Inspector holding the Independent Examination of the Joint Core Strategy Local Plan.

- If you are seeking to make representations on the **way in** which the Proposed Main Modifications have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.
- If it is the **actual content of** the Proposed Main Modifications on which you wish to comment or object it is likely it will relate to **soundness** i.e. whether the Local Plan is **positively prepared, justified, effective or consistent with national policy**.

3. Legal compliance

At the Public Examination, the Inspector will first check that the Proposed Main Modifications meet the legal requirements under Section 20 (Independent Examination) (5)(a) of the 2004 Act before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- a) Is the Local Plan in question, in this case the Joint Core Strategy, within the current West Northamptonshire Local Development Scheme (LDS) and have the key stages been followed?
- b) Has the process of community involvement in preparing the Proposed Main Modifications been in general accordance with the Statements of Community Involvement (SCIs) which have been adopted by each of the Partner Councils; Daventry District, Northampton Borough and South Northamptonshire?
- c) Has the preparation of the JCS overall complied with the stages prescribed in the in the Town and Country Planning (Local Planning) (England) Regulations 2012?
- d) Has a Sustainability Appraisal (SA) Report been published?

4. Soundness

To be sound a Local Plan should be:

- **Positively prepared**

This means that the Joint Core Strategy should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- **Justified**

This means that the Joint Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area; and
- Research/ fact finding: the choices made in the plan are backed up by facts.

The Joint Core Strategy should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.

The Joint Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

- **Effective**

This means the Joint Core Strategy should be deliverable, embracing the following:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.

The Joint Core Strategy should also be **flexible** and **able to be monitored**. The Joint Core Strategy should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Joint Core Strategy should make clear that major changes may require a formal review including further public consultation.

Any measures, which the Council has included to make sure that targets are met, should be clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the Joint Core Strategy needs amendment.

- **Consistent with national policy**

The Joint Core Strategy should be consistent with national policy. Where there is a departure, there must be clear and convincing reasons to justify this approach. Conversely, you may feel the Joint Core Strategy should include a policy or policies which would depart from national policy to some degree in order to meet a clearly identified and fully justified local need. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national policy and support your assertion with evidence.

The Partner Councils consider that the Proposed Main Modifications satisfy all these tests of soundness and that the JCS is the most appropriate strategy for the future development of West Northamptonshire. However, if you consider that the Proposed Main Modifications are unsound against one or more of the four tests of soundness (positively prepared, justified, effective, or consistent with national policy), you should identify which test(s) under Part B Question 3

5. General Advice

If you wish to make a representation seeking a change to the Proposed Main Modifications you should:

- a) Make clear in what way the Proposed Main Modifications are not sound having regard to the legal compliance check and the four tests set out above.
- b) Support your representation by evidence showing why they should be changed.

c) Say precisely how you think Proposed Main Modifications should be amended in Part B Question 4.

Representations should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination process. You can tell us if and why you wish participate at a resumed hearing session under Part B Questions 6 and 7 and this will be considered by the Inspector at his discretion, as only those who attended originally have a “right to be heard”, as distinct from the opportunity to make further written submissions.

Where there are groups who share a common view on the Proposed Main Modifications, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised. All representations, both oral and written, will be given equal weight.

The submitted Joint Core Strategy, as amended by the Proposed Main Modifications, is intended to be the final version for consideration by the Planning Inspector appointed by the Secretary of State. Therefore, raising new issues in representations at this stage which have not been raised during the plan preparation and consultation process will not be helpful. Furthermore, the Inspector will not be able to make a change unless it relates to an issue which has been subject to the proper procedures of community involvement and Sustainability Appraisal.

6. Completing the Representation Form

Part A – This part of the form relates to personal details or your agent’s details if they are completing the form on your behalf. It also asks whether you would like to be notified of the progress of the JCS in the future. You must complete Part A as anonymous representations will not be accepted.

Part B- Complete this part of the form if your representation relates to the Proposed Main Modifications to the JCS.

Part C – Complete this part of the form if your representation relates to the Sustainability Appraisal Addendum Report and/ or the Habitats Regulations Assessment Addendum Report.

Part D – Complete this part of the form if your representation relates to the Objectively Assessed Housing and Jobs Need.

Please fill out a separate Part B, C or D for every representation you wish to make on each element of the consultation. Please mark clearly how many sheets form part of the submission in the relevant box and attach all the sheets firmly to Part A when you return them.

7. Submitting Representations

To avoid duplication of work, the Joint Planning Unit requests that respondents do not send additional or duplicate copies of representations in more than one format (for example, an electronic version and a hard copy). Please note that copies of **all comments (including your name, but not your contact details) will be made available for the public to view, and therefore cannot be treated as confidential**. All representations should be made using the 'Representation Form' to ensure the Joint Planning Unit has all the information needed to process your comments. We encourage representations to be made through our consultation portal at <http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti>

All forms must be received **by 5 pm on Tuesday 25th of February 2014**.

All representations received will be acknowledged by post or email.

You can submit your representations online:

– **By completing the representation form at**

<http://ldfconsultation.westnorthamptonshirejpu.org/consult.ti>,

where you will be able to print or save a copy for your own records.

Or, you can send completed forms to us:

– **By email: westnorthantsjpu@northampton.gov.uk**

– **By post: West Northamptonshire Joint Planning Unit, The Guildhall, St Giles Square, Northampton, NN1 1DE**

– **By fax: 01604 838543**

If you have any questions, please contact us by email at westnorthantsjpu@northampton.gov.uk or by telephone: 01604 837838