Quick guide to the Statement of Compliance with the Duty to Cooperate

This statement has been prepared in order to outline how the Duty to Cooperate has been addressed in the production of the Part 2 Local Plan for Corby.

The Duty to Cooperate requires local planning authorities and other prescribed bodies to engage on the preparation of the Local Plan and other activities relating to the sustainable development and use of land, in particular in connection with strategic matters, defined as matters affecting more than one planning area.

Corby Borough Council consider that the Duty to Cooperate has been fulfilled in relation to the preparation of the Part 2 Local Plan and that there are no cross boundary issues arising from the document that have not been addressed through higher level strategic documents.

An independently appointed Planning Inspector will be appointed to examine the Part 2 Local Plan, and in doing so will determine whether or not the legal Duty to Cooperate has been adequately addressed during the preparation of the Plan.
## Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Introduction</strong></td>
<td>3</td>
</tr>
<tr>
<td>Geographic Context</td>
<td>3</td>
</tr>
<tr>
<td>History of Joint Working</td>
<td>3</td>
</tr>
<tr>
<td>Joint Working Arrangements</td>
<td>4</td>
</tr>
<tr>
<td>North Northamptonshire Joint Planning Committee</td>
<td>5</td>
</tr>
<tr>
<td>North Northamptonshire Joint Delivery Committee</td>
<td>5</td>
</tr>
<tr>
<td>South East Midlands Local Enterprise Partnership</td>
<td>5</td>
</tr>
<tr>
<td>North Northamptonshire Joint Planning &amp; Delivery Unit</td>
<td>5</td>
</tr>
<tr>
<td>Northamptonshire Planning Officers Group</td>
<td>6</td>
</tr>
<tr>
<td>North Northamptonshire Policy Wider Team/Housing Strategy Meeting</td>
<td>6</td>
</tr>
<tr>
<td>North Northamptonshire Monitoring Officers Group</td>
<td>6</td>
</tr>
<tr>
<td>North Northamptonshire Joint Committee</td>
<td>6</td>
</tr>
<tr>
<td>Public Health Northamptonshire/Health and Wellbeing Board</td>
<td>6</td>
</tr>
<tr>
<td><strong>Engagement with Duty to Cooperate Bodies</strong></td>
<td>7</td>
</tr>
<tr>
<td>North Northamptonshire Councils and Other Neighbouring Local Planning Authorities</td>
<td>7</td>
</tr>
<tr>
<td>Northamptonshire County Council</td>
<td>9</td>
</tr>
<tr>
<td>Corby Clinical Commissioning Group</td>
<td>12</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>12</td>
</tr>
<tr>
<td>Historic England</td>
<td>13</td>
</tr>
<tr>
<td>Natural England</td>
<td>13</td>
</tr>
<tr>
<td>Homes England</td>
<td>14</td>
</tr>
<tr>
<td>Office of Rail and Road</td>
<td>15</td>
</tr>
<tr>
<td>Highways England</td>
<td>15</td>
</tr>
<tr>
<td>Civil Aviation Authority</td>
<td>15</td>
</tr>
<tr>
<td>NHS England</td>
<td>15</td>
</tr>
<tr>
<td>South East Midlands Local Enterprise Partnership</td>
<td>16</td>
</tr>
<tr>
<td>Local Nature Partnership</td>
<td>16</td>
</tr>
<tr>
<td>Elected Member Involvement</td>
<td>16</td>
</tr>
</tbody>
</table>
## Introduction

1.1 This report provides a summary of how Corby Borough Council has complied with the Duty to Cooperate, as set out in Section 110 of the Localism Act 2011. It imposes a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis. Although the duty to cooperate is not a duty to agree, local planning authorities should work together to ensure that strategic cross boundary matters have been addressed prior to the submission of a plan for examination.

1.2 The duty to cooperate bodies for Corby Borough Council include the following:

- Local Planning Authorities within the North Northamptonshire Housing Market Area (North Northamptonshire Joint Planning Committee/North Northamptonshire Joint Planning & Delivery Unit; Kettering Borough Council, East Northamptonshire Council and Borough Council of Wellingborough); and other adjoining local authorities (Harborough District Council and Rutland County Council);
- Northamptonshire County Council (including the Highways Authority);
- Corby Clinical Commissioning Group
- Environment Agency;
- Historic England;
- Natural England;
- Homes England;
- Office of Rail and Road;
- Highways England;
- Civil Aviation Authority;
- NHS England;
- South East Midlands Local Enterprise Partnership; and
- Local Nature Partnership.

### Geographic Context

1.3 Corby shares administrative boundaries with Kettering Borough Council, East Northamptonshire Council, Harborough District Council and Rutland County Council. The North Northamptonshire housing market area covers the entire local authority boundaries of Corby, Kettering, East Northamptonshire and Wellingborough.

1.4 Corby is a well-established growth area, with an agenda to double the population towards 100,000 people by 2030 alongside the required services to help support this growth. It serves as the northern functional sub-area in North Northamptonshire, and is an important sub-regional hub for the north of the county and beyond.

1.5 The above factors mean that the area is in a strong position to both contribute and benefit from the Cambridge-Milton Keynes-Oxford corridor which is recognised by the Government as a strategically important area to stimulate economic growth in the national interest.

### History of Joint Working

1.6 Corby Borough Council has a long history of working with neighbouring authorities and statutory consultees. The establishment of the North Northamptonshire Joint Planning Unit in 2005 led to the Core Spatial Strategy prepared by the Joint Planning Unit and adopted in
2008. This was superseded by the North Northamptonshire Joint Core Strategy (JCS) in July 2016. The JCS is the strategic Part 1 Local Plan for Corby, East Northamptonshire, Kettering and Wellingborough. It outlines a big picture to be developed in more detail through the Part 2 Local Plans prepared by the District and Borough Councils and by Neighbourhood Plans prepared by Neighbourhood Planning Groups. The JCS is prepared by the JPU, reporting to the North Northamptonshire Joint Planning Committee made up of representatives from the District, Borough and County Councils.

1.7 During the examination of the JCS, Corby and the authorities within North Northamptonshire agreed housing and job growth targets to meet the objectively assessed needs of the wider market area, not just Corby’s. Cooperation on these key cross boundary strategic issues during the formulation of the JCS, and Local Plan Parts 2’s broad compliance with the JCS, is reflected in the absence of any significant cross boundary issues.

1.8 Key achievements and joint evidence prepared includes the following in chronological order:

- North Northamptonshire Green Infrastructure: Local Framework Study for Corby (September 2005);
- Welland Valley Route Feasibility Study (draft report March 2014);
- Assessment of Retail Network and Hierarchy (draft report June 2016, final report March 2019);
- Review of Boundaries in Corby Town Centre (July 2016);
- Study of Housing and Support Needs of Older People across Northamptonshire (March 2017);
- North Northamptonshire Infrastructure Delivery Plan (September 2017);
- Open Space, Sport and Recreation Study (November 2017);
- Rural Housing Needs Surveys (December 2017);
- Threshold for Retail Impact Testing Background Paper (April 2018);
- Employment Land Review (May 2018, addendum May 2019);
- Site Selection Methodology Background Paper (June 2018, update June 2019);
- Sustainability Appraisal for the Corby Part 2 Local Plan Interim Report (June 2018);
- Habitats Regulations Assessment for the Corby Part 2 Local Plan (June 2018);
- Custom and Self-Build Housing: Demand Assessment Framework (December 2018);
- North Northamptonshire Brownfield Land Register (updated to 31st December 2018);
- Strategic Flood Risk Assessment (February 2019, additional sites March 2019);
- North Northamptonshire Gypsy and Traveller Accommodations Assessment (March 2019); and
- North Northamptonshire Investment Framework (June 2019)

1.9 The JCS is supported by the North Northamptonshire Infrastructure Delivery Plan prepared by the Joint Planning Unit. This provides a vehicle for engaging with service providers on ensuring infrastructure is delivered to support the growth envisaged.

**Joint Working Arrangements**

1.10 Partnership Groups include:
- North Northamptonshire Joint Planning Committee;
- North Northamptonshire Joint Delivery Committee;
- South East Midlands Local Enterprise Partnership (SEMLEP);
- North Northamptonshire Joint Planning & Delivery (JPDU);
• Northamptonshire Planning Officers Group;
• North Northamptonshire Policy Wider Team/Housing Strategy Meeting;
• North Northamptonshire Monitoring Officers Group;
• North Northamptonshire Joint Committee; and
• Public Health Northamptonshire/Health and Wellbeing Board.

North Northamptonshire Joint Planning Committee

1.11 The Joint Planning Committee was established in July 2005 as the formal decision making body for the North Northamptonshire Joint Planning & Delivery Unit. The Joint Planning Committee was the first such committee established under new planning legislation and is made up of 3 elected members from each local planning authority (Corby, East Northamptonshire, Kettering and Wellingborough) as well as 3 members from Northamptonshire County Council. It is responsible for agreeing the Joint Core Spatial Strategy and joint other planning policy work, but has no development control powers, which remain with the individual district/borough councils.

North Northamptonshire Joint Delivery Committee

1.12 The Joint Delivery Committee’s role is to ensure that the development of the Sustainable Urban Extensions adheres to agreed delivery standards in terms of design, build quality, sustainability, security and inter-connectivity.

1.13 The Joint Delivery Committee comprises three elected members from each of the North Northamptonshire local planning authorities and one member from Northamptonshire County Council.

South East Midlands Local Enterprise Partnership (SEMLEP)

1.14 Corby regularly attends and contributes to SEMLEP meetings that take place at officer and Member level. In particular the Planners’ Forum meets three times a year to monitor housing delivery in the South East Midlands and helps ensure joined up delivery of housing and other growth-enabling infrastructure across the LEP area in a way that promotes quality of life for both new and existing communities.

North Northamptonshire Joint Planning & Delivery Unit

1.15 The North Northamptonshire Joint Planning Unit was formally established in October 2004 by Corby, Kettering, Wellingborough and East Northamptonshire Councils, together with Northamptonshire County Council.

1.16 The planning unit is funded through contributions from the local planning authorities, and was established to prepare the JCS and support the local authorities with strategic planning. In 2015, the Joint Delivery Unit (JDU) and Joint Delivery Committee was established to coordinate and drive delivery of the Sustainable Urban Extensions (SUEs) and supporting infrastructure. The JPU and JDU merged in 2017 to form the JPDU and continue to work in partnership with the four local authorities, Northamptonshire County Council and government partners to deliver the extensive growth ambition for North Northamptonshire.
Northamptonshire Planning Officer Group

There are regular meetings between planning policy officers from the seven district and borough councils as well as representatives from the county council at both Chief Planning Officer’s level and officer level.

North Northamptonshire Policy Wider Team/Housing Strategy Meeting

The North Northamptonshire Joint Planning & Delivery Unit convene a monthly meeting of Policy Officers from Corby, Kettering, East Northamptonshire and Wellingborough, along with the County Council, to exchange information and views on the implementation and review of the JCS, individual local plans, Government planning consultations and other relevant planning issues.

Housing strategy officers are invited to attend on a quarterly basis which provides an opportunity to and explore the links between planning and housing delivery.

North Northamptonshire Monitoring Officers Group

The first reconvened meeting of this Group took place in May 2019 and will subsequently meet on a regular ongoing basis. Discussions focus on monitoring arrangements and indicators across North Northamptonshire’s local planning authorities within the context of the JCS and Part 2 Local Plans.

North Northamptonshire Joint Committee

The North Northamptonshire Joint Committee, which will pave the way for the shadow authority to deliver the new unitary council for North Northamptonshire was established in June 2019.

Public Health Northamptonshire/Health and Wellbeing Board

The Health and Wellbeing Board enables key leaders from across the Northamptonshire health and care system to jointly work to:

- improve the health and wellbeing of the people in their area;
- reduce health inequalities; and
- promote the integration of services.

The Board also aims to increase democratic legitimacy in health and provide a key forum for public accountability of the NHS, public health, social care for adults and children and other commissioned services that the Board agrees are directly related to health and wellbeing.

An officer from the Public Health team is currently on secondment to the JPDU to explore the links between planning and health and identify issues, challenges, concerns and opportunities and is supporting local authorities across the County address health issues in their Part 2 Local Plans.
2. Engagement with Duty to Cooperate Bodies

North Northamptonshire Councils and Other Neighbouring Local Planning Authorities

North Northamptonshire Joint Planning Committee/North Northamptonshire Joint Planning & Delivery Unit

Nature of cooperation/consultation:
• Consultee
• Face to face meetings
• Joint Planning Committee member
• Joint Delivery Committee member
• Attends joint planning officer groups
• Attended Employment Land Review workshop in June 2017
• Assists in policy development and background work for the Part 2 Local Plan

2.1 Members of the North Northamptonshire Joint Planning Committee considered the first Regulation 18 consultation at its meeting of 24 January 2017, considering it an “effective document”.

2.2 The North Northamptonshire Joint Planning & Delivery Unit were closely involved at all stages of the preparation of the Part 2 Local Plan for Corby, principally providing advice and guidance to ensure the Plan and supporting evidence base is in general conformity with the North Northamptonshire Joint Core Strategy (the Part 1 Plan). This has included attendance at workshops, face to face meetings and quarterly Policy Wider Team/Housing Strategy Team Meetings, drawing on wider expertise within partner organisations where appropriate.

Kettering Borough Council

Nature of cooperation/consultation:
• Consultee
• Face to face meetings
• Joint Planning Committee member
• Joint Delivery Committee member
• Attends joint planning officer groups
• Attended Employment Land Review workshop in June 2017
• Attended cross-boundary meeting to discuss Green Infrastructure in November 2018
• Assists in policy development and background work for the Part 2 Local Plan

2.3 Strategic issues addressed within the JCS. No representations received from Kettering during the first or second Regulation 18 consultation.

2.4 Discussed individual approaches to green infrastructure (GI) within the Part 2 Local Plans and identified relevant cross-boundary issues. Evidence base was shared, which helped to strengthen and refine the GI corridors. The documents that helped to refine the cross-boundary corridors included the Green Infrastructure Feasibility Report and the Welland Valley Route Feasibility Study for a cycle route between Market Harborough and Peterborough.
Kettering Borough Council led on the Gypsy and Traveller Accommodation Assessment on behalf of the North Northamptonshire Authorities.

**East Northamptonshire Council**

*Nature of cooperation/consultation:*
- Consultee
- Face to face meetings
- Joint Planning Committee member
- Joint Delivery Committee member
- Attends joint planning officer groups
- Attended Employment Land Review workshop in June 2017
- Attended cross-boundary meeting to discuss Green Infrastructure in November 2018

2.6 Strategic issues addressed within the JCS. No representations received from East Northamptonshire during the first or second Regulation 18 consultation.

2.7 East Northamptonshire made the point at the Employment Land Workshop that Rockingham Motor Racing Circuit Enterprise Area within the boundaries of East Northamptonshire Council was deliverable and would count towards Corby’s employment target. This was recognised in the Employment Land Review which forms part of the Part 2 Local Plan evidence base.

2.8 Discussed individual approaches to GI within the Part 2 Local Plans and identified relevant cross-boundary issues. Evidence base shared between authorities, which helped to strengthen and refine the GI corridors, in particular the connectivity with Tresham Garden Village from Priors Hall, Weldon Park and Weldon village into East Northamptonshire’s boundary. The documents that helped to refine the cross-boundary corridors included the Green Infrastructure Feasibility Report for the East Northamptonshire Greenway route between Oundle and Weldon, and the Welland Valley Route Feasibility Study for a cycle route between Market Harborough and Peterborough.

**Borough Council of Wellingborough**

*Nature of cooperation/consultation:*
- Consultee
- Face to face meetings
- Joint Planning Committee member
- Joint Delivery Committee member
- Attends joint planning officer groups

2.9 Strategic issues addressed within the JCS. No representations received from Wellingborough during the first or second Regulation 18 consultation.

**Harborough District Council**

*Nature of cooperation/consultation:*
- Consultee
- Attended Employment Land Review workshop in June 2017
- Corby Borough Council attended Duty to Cooperate Workshop in Market Harborough in July 2017
2.10 Officers from both Harborough District Council and Corby Borough Council attended workshops which informed the Employment Land Reviews of both authorities. Harborough District Council responded to the second Regulation 18 consultation to confirm they had no comments to make at that time on the Plan.

Rutland County Council

Nature of cooperation/consultation:
- Consultee

2.11 No representations received from Rutland during the first or second Regulation 18 consultation.

Northamptonshire County Council

Nature of cooperation/consultation:
- Consultee
- Face to face meetings
- Joint Planning Committee member
- Joint Delivery Committee member
- Attends joint planning officer groups
- Assists in policy development and background work for the Part 2 Local Plan

2.12 During the formulation of policies and identification of allocations, Corby Borough Council officers ensured there was continuous dialogue with officers from Northamptonshire County Council. These representatives were invited to provide relevant data and comment on draft policies and the comments received have been taken into account in the Part 2 Local Plan for Corby.

Adult Social Services

2.13 Northamptonshire County Council – Adult Social Services – made two points in response to the second Regulation 18 Consultation. The first point was in relation to affordable housing and the benefits of achieving affordable running costs whilst delivering energy efficiency and carbon reduction. In response the Council pointed out that policies to address such issues were already included in the JCS. The second point was in relation to achieving lifetime homes standards - given that by 2040 nearly 1 in 4 people will be over 65 - and the importance of providing homes in the correct location and requiring the inclusion of a proportion of older peoples’ accommodation, which does not need to be age exclusive. In response to the points raised Corby Borough Council revised the policy on Specialist Housing and Older People’s Accommodation and supporting text.

Highways Authority

2.14 For the first Regulation 18 consultation Northamptonshire County Council Highways raised the point that additional infrastructure might be needed in the event that growth outlined in the Part 2 Local Plan necessitated this need. In response the Council said any such requirements would be kept under review as the Plan progressed. Secondly, the Council were asked to consider the future demand for car-parking as part of a comprehensive strategy for Town Centre regeneration. In response Corby Borough Council commissioned
the County Council to undertake a Town Centre Parking Study to understand current levels of parking provision in the town centre and surrounding area and to determine, based on forecast demand whether it is sufficient to accommodate future parking demand to the end of the Plan period (2031). The Study concluded that based on the forecast increase in car ownership levels there is sufficient capacity within the off-street public car parks in the town centre to accommodate future demand during the week, but at weekends the analysis suggested that there is insufficient capacity to meet the forecast increase in parking demand within the existing town centre car parks. However, the Study identified additional spaces which would provide additional capacity to meet the increased forecast demand. It also recommended that regular monitoring of town centre car parks will be needed to be undertaken to understand the trend in car parking use.

2.15 A final comment noted the work the County Council is doing to support the Town Centre (CENTARA) Neighbourhood Plan.

2.16 A follow up letter of support was received during the second Regulation 18 consultation welcoming the preferred options in relation to transport subject to any additional funding announcements and additions to the local evidence base.

Development Management (Education)

2.17 The County Council’s Development Management Team (Education) responded to the second Regulation 18 consultation by highlighting a significant demand for new schools, as well as extensions to existing schools, in the Borough to 2031 as a result of Corby’s growth targets, as well as to meet current demand for new secondary school places. Site specific allocations for education were strongly recommended to address current and future demand and it was recommended that all new housing development over 10 units should be required to contribute to primary and secondary education infrastructure.

2.18 Work has taken place with officers from the County Council and local delivery partners since the Regulation 18 consultation to address secondary school place needs. This has included an assessment of site options and the identification of a possible site at land to the east of Weldon – the Part 2 Local Plan Publication Draft (Pre-Submission) now contains a facilitating policy to allow for a new school to the east of Weldon.

Lead Local Flood Risk Authority

2.19 Northamptonshire County Council, Flood and Water, responded to the first Regulation Consultation 18 by agreeing that a local policy is not required to cover flood risk management and requesting an updated Level 1 SFRA. In addition they requested that reference is made to the ‘Local Standards and Guidance for Surface Water Drainage in Northamptonshire’. In response the appropriate reference was included in the Part 2 Local Plan and updated Level 1 SFRAs were carried out in conjunction with the Environment Agency and the County Council. No further comments were received in respect of flooding and water management issues from Northamptonshire County Council.

Public Health Team

2.20 Joint responses were received on behalf of Northamptonshire County Council’s Public Health Team and Corby Clinical Commissioning Group. A number of comments were made in respect of public health in the first Regulation 18 consultation. These included details of the
health challenges facing Corby and the need to adopt a holistic policy approach to addressing these challenges. In response it was acknowledged that health cuts across several issues and cross references were made in the Part 2 Plan where appropriate. Further comments made the case for an additional locally specific policy on Health and Wellbeing which has been taken forward in the Part 2 Local Plan.

2.21 Many of the points raised for the second Regulation 18 consultation supported the approach taken. This included support for the recognition of challenges relating to community health and wellbeing in the Spatial Portrait and Visions and Outcomes, whilst noting the need to consider the provision of public open spaces. Whilst the latter point is covered in the JCS, other additional wording to provide clarification was added to the Part 2 Local Plan. In respect of the promotion of health and wellbeing an additional overarching policy was added to the Part 2 Local Plan to address the specific health challenges in the Borough. Further support was given to the policy approach taken towards Local Green Spaces, Green Corridors and Employment Uses in established Industrial Estates which was welcomed. In response to comments on the policy relating to Housing Mix and Tenure amendments were made to include the requirement to include a proportion of housing designed to meet the identified needs of older people and others with a need for specialist housing. With regard to the chapter on Town Centres and Town Centre Uses a number of changes were made to the policies and supporting text to address comments on the need to make reference to the principles of ‘Healthy Streets’.

Archaeological

2.22 Northamptonshire County Council – Archaeological Unit – made three points in respect of the first Regulation 18 consultation. Firstly, they emphasised that non designated assets can also include buried remains, parks and gardens and open space and that the Local List should reflect this. Secondly the point was made that Corby Borough Council should be robust and proactive in requiring developers to submit archaeological assessments, especially in respect of development at SUEs and, thirdly, the approach to protecting and enhancing the historic environment should not be considered in isolation but rather should include consideration of historic landscapes and parklands. In response to the points the Council made a number of changes to the Part 2 Local Plan as well as committing to involve input from all interested parties in the drawing up of a Local List.

Natural Environment

2.23 The comments from Northamptonshire County Council (Natural Environment) were received on the first Regulation 18 Consultation. Support for the designation of non-statutory conservation sites was given with the caveat that precise boundaries are not always publically available. This issue was noted and subsequently addressed by not including boundary maps in the case of Local Wildlife Sites, Potential Wildlife Sites and Regionally Important Geological Sites, which will instead be listed in the Part 2 Local Plan. Other comments related to the need to designate or update open spaces, including sports and recreational facilities, some of which were based on the 1997 Local Plan, as well as Local Green Spaces and Green Infrastructure Corridors. This was addressed through the Open Space, Sport and Recreation Study published in November 2017 as well as by introducing a Policy to provide scope for the designation of Local Green Spaces. A further comment related to support for the designation of a tranquility area in the north-east of the Borough. However, following correspondence with East Northamptonshire Council it was decided not to proceed with the identification of tranquility areas at the present time.
Minerals and Waste Planning Authority

2.24 No representations received from Northamptonshire County Council as the Minerals and Waste Planning Authority during the first or second Regulation 18 consultation.

Corby Clinical Commissioning Group

2.25 See under Northamptonshire County Council – Public Health Team.

Environment Agency

Nature of cooperation/consultation:
• Consultee
• Follow up emails

2.26 The Environment Agency initially provided comments on the Sustainability Appraisal Scoping Report in November 2016 which were taken into account in preparing the final document.

2.27 The Environment Agency submitted a late response to the first Regulation 18 consultation. The key issues raised, which were taken into account by the Council, were as follows:

- Welcomed the intention to update Corby’s SFRA and highlighted the need to take into account the Flood Risk Management Study and the Water Cycle Study as part of this process.
- Highlighted the need for the Part 2 Local Plan to include locally specific policy to support utility service infrastructure as well as the need to refresh the 2008 North Northamptonshire Water Cycle Strategy.
- Requested update on progress on the linked issues of the Corby Culvert and river corridor improvements.
- Suggested progress to improvements to the Southern Stream tributary of the Willow Brook.
- Requested details of the arrangements for sewage with respect to Priors Hall Park development.

2.28 The first recommendation made in response to the second Regulation 18 consultation by the Environment Agency was that a separate section on flood risk management be included in the Part 2 Local Plan chapter on Securing Infrastructure and Services and a similar point was made regarding reference to fluvial flood risk. In response the Council added additional wording to make it clear that the Part 2 Local Plan is intrinsically linked to the JCS and must be read alongside it. A further recommendation concerned Policy 1 (Open Space) with a suggestion that it should include wording to utilise proposed open spaces (alongside watercourses) as additional flood storage areas. Additional text was added to the Open Space section to reflect this recommendation. The next point raised recommended that flood risk (both fluvial and surface water) is made separate to and not combined into a ‘Utilities Services’ section as it was felt that placing it there misplaces the weight and interpretation necessary for managing this natural hazard. As the JCS includes sufficient policy on the issue the Council made no change in response to this comment. The next comment provided reassurance that the SFRA had been updated and approved to the Environment Agency’s satisfaction.
2.29 Comments were also provided for Employment Sites E4 and E5, suggesting in both cases that a sequential test should be carried out in accordance with the SFRA to determine suitability of the sites prior to allocation. In response the Part 1 SFRA was updated to include the sites in question and additional text was added to clarify that a site specific Flood Risk Assessment would be required to accompany any future development proposals. A related comment on the Policy concerned with Employment Uses in Established Industrial Estates recommended that any regeneration of established industrial estates should provide betterment in terms of flood risk. This was taken forward by an additional paragraph in the supporting text to the Policy. Two additional comments focused on site specific SFRAs which were noted by the Council but it was not felt necessary to reference the SFRA on a site by site basis. The remaining comments were in relation to the Interim Sustainability Appraisal which were actioned as appropriate.

2.30 Following further work on the Part 2 Local Plan, including where this addressed the representations described above, a draft copy of the Publication Draft Part 2 Local Plan was sent to the Environment Agency, who confirmed that they had no additional observations to make.

Historic England

*Nature of cooperation/consultation:*
- Consultee

2.31 Historic England made a number of comments on the first Regulation 18 consultation including support for the production of a local list of non-designated heritage assets and a locally specific policy on the historic environment. In this regard the suggestion that the policies should be strategic in nature was not felt appropriate since this is a matter for the review of the JCS. Also the suggestion that further work on historic shop fronts was noted but would require further evidence. Request for early involvement with site allocations was noted and welcomed. Also suggested that flexibility with regard to shop frontages conserves and enhances heritage assets and their settings and disused the scope for article 4 directions. The Council noted these comments while suggesting that Policy 2 of the JCS ensures that such assets are preserved and enhanced. Specific comments were also made on the Sustainability Appraisal and Site Selection Background Paper which were noted and actioned as appropriate.

2.32 No further representations were received from Historic England on the second Regulation 18 consultation.

Natural England

*Nature of cooperation/consultation:*
- Consultee
- Follow up emails

2.33 Natural England responded to the first Regulation 18 consultation by advising on the consideration of a number of specific evidence based documents as the Part 2 Plan progresses. This advice was taken by the Council. There was also support for the inclusion of locally designated sites on the Policies Map, as well as support for the identification of areas which are known to have high populations of protected species, as well as support for the identification of priority habitats and the identification and protection of local and
neighbourhood green infrastructure corridors. In response the Council noted that Policy 4 of the JCS provides a framework to designate further sites at local level and that in some cases further evidence based work is required to explore these issues. Natural England also suggested strengthening Policy 21 of the JCS, which sets out an overarching policy for the planting of woodland, increasing biodiversity linkages and green infrastructure corridors and enhancing Rockingham Forest, by specifying the types of species and habitats which might be supported. This issue is being given further consideration by the Council. The suggestion was also made by Natural England that issues around health and wellbeing can be linked to the green infrastructure policies, with ease of access to a network of improved pedestrian and cycle routes which link new developments to the town and countryside being of particular benefit. This theme has been picked up by the Council within the Part 2 Plan. Support was also given to amendments to the Sustainability Appraisal Scoping Report.

2.34 In response to the second Regulation 18 consultation Natural England suggested identifying additional green corridors where there can be increased tree and hedgerow planting in the Rockingham Forest area. At the time of writing this issue is still being considered by the Council. There was also agreement with the findings of the Habitats Regulations Assessment and Interim Sustainability Appraisal.

2.35 In a follow up email received in April 2019 Natural England outlined a number of outstanding issues in the Part 2 Local Plan which, at the time of writing, are being considered by the Council and which include:

- Advise clarity that “major new tree planting” will be carried out via the Plan in relation to Rockingham Forest within Green Infrastructure corridors as outlined.
- Note that the draft Plan does not contain a bespoke policy defining the key native habitats and species within the Plan area. Suggestion that an appropriate policy would act as a useful tool to define specific and relevant outcomes within the Green Infrastructure corridors as emphasised within the Plan.
- Suggest that the Plan should be identifying additional corridors where there can be increased tree and hedgerow planting in the Rockingham Forest area.
- Advise that the Plan should go above and beyond, or provide additional enhancements, to those GI schemes already put forward, such as Priors Hall SUE.
- Note that the GI networks mapped within Appendix 4 of the draft Plan (sub-regional and Local GI networks) do not match the outlines within the North Northamptonshire JCS Policies Map for Corby, within Appendix 1 of the JCS. In addition, Appendix 4 does not show the Nene Valley Nature Improvement Area supported within Policy 4 of the JCS.
- Advise that the proposal of increased tree and hedgerow planting within the expanded GI network (in accordance with JCS Policy 21) should be written into Policy 6 Green Infrastructure Network for clarity and completeness.

Homes England (Homes and Communities Agency)

Nature of cooperation/consultation:
- Consultee
- Face to face meetings

2.36 Homes England responded to the first Regulation Consultation call for sites by putting forward three sites for consideration for inclusion in the Part 2 Local Plan. Two of which, Land at Station Road and Land off Elizabeth Street, have been included in the Plan.
2.37 As part of the second Regulation 18 consultation Homes England responded indicating support for the allocation of land at Elizabeth Street for residential development. Homes England own a significant portion of this site and are in discussions with the Northamptonshire Police Authority to deliver this site within the plan period. During the same consultation Homes England indicated support for the allocation of Everest Lane as a town centre redevelopment opportunity site; however, further clarity was requested within the policy to support a residential-led mixed use development. The Council has subsequently assessed the site at Everest Lane for housing as part of the Site Selection Methodology Background Paper and revised principles are included within the Pre-Submission Draft Plan (Policy TC2), which support a residential-led mixed use redevelopment opportunity site.

2.38 Further consultation has taken place between the Council and Homes England, including pre-application discussions, for those sites within or partly within Homes England’s ownership to determine expected timescales for delivery; which has informed the background work for the residential and town centre allocations.

Office of Rail and Road (Office of Rail Regulation)

*Nature of cooperation/consultation:*
  • Consultee

2.39 No representations received from the Office of Rail and Road during the first or second Regulation 18 consultations.

Highways England

*Nature of cooperation/consultation:*
  • Consultee

2.40 Highways England responded to the first and second Regulation 18 consultations. In response to the first consultation they noted that improvements to the A14 were a cross boundary issue which will be considered through the review of the JCS and that any additional sites identified in the Part 2 Plan which have the potential to impact upon the operation of the A14 should be the subject of a Transport Assessment. The Council noted both of these comments. Highways England reiterated similar points in response to the second Regulation 18 consultation which were duly noted by the Council.

Civil Aviation Authority

*Nature of cooperation/consultation:*
  • Consultee

2.41 No representations received from the Civil Aviation Authority during the first or second Regulation 18 consultations.

NHS England

*Nature of cooperation/consultation:*
  • Consultee
2.42 No representations received from NHS England during the first or second Regulation 18 consultations.

South East Midlands Local Enterprise Partnership (SEMлеп)

Nature of cooperation/consultation:
• Consultee
• Attended Employment Land Review workshop in June 2017
• Officers from Corby Borough Council attend SEMlep Planners Forum

2.43 No representations received from SEMlep during the first or second Regulation 18 consultations.

2.44 SEMlep raised a number of points at the Employment Land Review workshop, namely concerns were expressed over de-allocating employment sites in Corby given that some other areas within SEMlep’s boundaries have very little employment land. A pipeline of different types of employment land was therefore critical for Corby and the wider sub-region. It was suggested that Corby’s growth strategy was unique and the availability of employment land and people are key drivers. Also given the forthcoming 100% business rates retention more investment in employment land and premises will mean additional revenue for the Council to spend in the Borough. The advice received informed the Employment Land Review which was published as part of the Part 2 Local Plan evidence base.

Local Nature Partnership

Nature of cooperation/consultation:
• Consultee

2.45 No representations received from Northamptonshire Local Nature Partnership during the first or second Regulation 18 consultations.

Elected Member Involvement

2.46 Corby Borough Council is represented on the North Northamptonshire Joint Planning Committee by three elected members including the Chair of the Local Plan Committee. The Council is represented on the North Northamptonshire Joint Delivery Committee by three elected members including the Leader of Corby Borough Council.

2.47 The Local Plan Committee meets approximately six times a year. Members receive regular updates on progress with the Part 2 Local Plan, and feed into the emerging chapters and evidence base and approve documents for consultation at key stages in the process. Member workshops have been held prior to both Regulation 18 consultations to discuss the evidence and key topics within the Plan and to highlight any local issues of concern outside of the formal Committees.