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Date: 21st May 2018



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Town Clerk
Oundle Neighbourhood Plan
Oundle Town Council
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Sent to: admin@oundle.gov.uk

Dear Sir / Madam

Oundle Neighbourhood Plan: Consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

I write on behalf of David Wilson Homes ('the client') in response to the (draft) Oundle Neighbourhood Plan ('NDP') which has been published by Oundle Town Council ('OTC') for the purposes of public consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

For clarity, our client has an interest in the land at Stoke Doyle Road, Oundle which has been allocated for residential development through (draft) Policy: 0.22 Land adjacent to the Cemetery, Stoke Doyle Road, which is contained within current iteration of the NDP.

At the outset, it is not the intention of this submission to provide any contextual information in regard to the site and therefore it is urged that this correspondence be read in conjunction with all previous submissions made on behalf of our client. Furthermore, the following does not seek to provide an exhaustive appraisal of the entire NDP but is focussed on those salient elements of the emerging plan which will influence the future development of our client's site.

Commentary:

At the outset, our client commends the significant work and undertaking which OTC and their partners have embarked upon to produce and publish the Regulation 14 consultation draft.

The following comments are set out in order of their appearance within the document and are made in the context of national planning policy and guidance on the production of neighbourhood plans as well as the content of the Development Plan for East Northamptonshire.

The documents vision and corresponding detailed objectives are welcomed, it is considered that they provide sufficient guiding principles for the longer term social, economic and environmental development of the neighbourhood plan area including that land at Stoke Doyle Road.

In reference to the stated objectives, the content of Objective 5 which relates to the delivery of residential development is refreshing. Furthermore, it is considered that the delivery of a residential proposal at the Stoke Doyle Road site could assist in achieving a number of the other stated objectives, particularly those relating to the protection and enhancement of local services and community facilities.

The content of Policy 0.1: Settlement Boundary has been noted with interest and its content is welcomed. However, the policy contains reference to '*Development within the Settlement Boundary as identified on the Policies Map...*' We note that the Policies Map has not been published as part of this consultation and therefore we reserve the right to comment further on the content of this policy and the corresponding map until it has been made publicly available for consultation purposes.

The client welcomes the thrust of Policy 0.6 Achieving High Quality Design; however, it is considered that this policy should not be overly prescriptive. In its current form, the policy benefits from references to the Oundle Design Statement and the Conservation Area Character Appraisal. However, the policy should be concisely revised to ensure that it does not repeat policies elsewhere within the development plan and subsequently conforms with Para 59 of the NPPF which requires design policies to avoid unnecessary prescription or detail.

The thrust of Policy 0.7 is understood, and it is clear that OTC have aspirations to protect a number of views within the Neighbourhood Plan Area. Given the proximity of the client's site to the cemetery (and associated buildings) to the south, it's location on the edge of the settlement as well as the topography across the site, the content of this policy could significantly affect the future development at Stoke Doyle Road. Whilst it is considered that the Council's Conservation Area appraisal will provide the guiding principles as to those views which should be protected, the policy once again references the Policies Map and we again reserve the right to comment until the map has been formally published for the purposes of public consultation.

The reference to '*Land adjacent to the Cemetery, Stoke Doyle Road*' and its allocation for residential development within Policy 0.16 is once again welcomed. However, it is critical to the success of the development that the dwelling allocation of 50 should be expressed as a minimum or indicative target with the final level of development at the site established through the development management process.

Clearly, the objectives of the plan seek to ensure the delivery of a significant level of housing in Oundle. The financial viability of any such development will be key to its delivery. Therefore, in terms of Policy 0.17 Housing Mix, careful consideration has been given to the policy and its supporting text. It is urged that Para 5.60 be revised to include specific reference to residential development in peripheral locations,

which is typically 'less dense' than those within central locations. Whilst full consideration will be afforded to Policy 0.17, the client's site is an edge of settlement location and therefore materially different to a development opportunity which would arise in a more central location within the town. Therefore, whilst we accept the content of Para 5.58 – 5.60 and the content of Policy 0.17, it is considered that the roles of differing locations, and the types of development that is suited to each locale, is clearly referenced within the policy and supporting text. In terms of Policy 0.17 it is urged that Criteria 4 be revised to include a reference to development viability and the important role that independent financial viability assessments play in the delivery of new residential developments for both market and affordable housing.

Paragraphs 5.75-5.78 and the content of Policy 0.22 Land adjacent to the Cemetery, Stoke Doyle Road are of significant interest to the client. It is hoped that the following information will serve as a constructive starting point for minor revisions to this element of the document to reflect those changes which have occurred since the Council's public consultation on the previous iteration of the NDP.

The site boundary of the '0.22 allocation' has now been amended with the eastern most strip of land, which lies between the proposed allocation and the rear of those properties on Warren Bridge, having been removed. Subsequently, the site area stated in Para 5.75 requires a downward revision to 3.3 hectares. This represents a 28% reduction in the size of the proposed allocation and therefore it is urged that the 0.5-hectare requirement for the extension to the neighbouring cemetery (as set out in Policy 0.22) be accordingly revised to 0.36 hectares to ensure that the future delivery of the site is not compromised.

The client is largely encouraged by the content of Policy 0.22. It is however urged that through further minimal revisions be considered to ensure its soundness and to instil flexibility to changing circumstances over time.

It is urged that reference to 'up to' be deleted from the first bullet point within Policy 0.22. As previously stated in response to Policy 0.16, the stated 50 dwellings should not serve as a cap on development but rather serve as a minimum or indicative target. There are sufficient controls elsewhere within the planning system to ensure that the site is suitably and, perhaps more importantly, sustainably developed.

It is requested that the second bullet point be amended to read 'Provide for an extension of approximately 0.36 hectares to the cemetery'. This revision represents a pro-rata decrease in the size of the allocation due to the boundary changes discussed above in the context of Para 5.75.

The reference to flood risk and on-site drainage issues as set out within bullet point four is welcomed. Technical work is currently progressing in this respect and we will furnish OTC with our initial findings as they become available. However, at this early stage we can confirm that the site can accommodate sufficient on-site attenuation measures.

In reference to the fourth bullet point and its commentary in respect of Footpath UF3, the creation of a useable route between Stoke Doyle Road and Benefield Road and its contribution to the Oundle Circular Route is considered unnecessary. Policy 0.26 Developer Contributions, provides a detailed basis for the delivery of infrastructure and those 5 projects which OTC have highlighted as priorities. It is therefore

considered that bullet point 4 be removed from Policy 0.22 as it only serves to repeat the policy coverage relating to pedestrian enhancements within Policy 0.26. Whilst financial contributions may be secured from the development of the clients site, towards such measures, it will ultimately be for the County Council, Local Planning Authority and Town Council to determine how such funds will be distributed and those projects which will benefit.

In conclusion, the efforts of the OTC to produce the Oundle NDP are to be commended and the thrust and content of those policies therein is welcomed. It is hoped that those minimal revisions referred to above will be positively considered by OTC and we would be more than happy to answer any questions which you may have.

If you require clarification on any of those points which have been raised above or require any further information in respect of the client's site then please do not hesitate to contact me via any of those channels listed.

Yours sincerely,


