

[REDACTED]

From: [REDACTED]
Sent: 21 May 2018 17:38
To: Admin
Cc: [REDACTED]
Subject: Oundle Neighbourhood Plan- Background Documents



In addition to its representations to the Oundle Neighbourhood Plan, East Northamptonshire Council also raises the following officer comment in respect of the Oundle Town Design Statement:

Overall the Town Design Statement contains some good information. However, it does not go far enough in setting out a statement for the town which would be useful in guiding future development. It is heavy on the historical development of the town but it is felt that more could be provided in terms of a design vision.

It provides seven generic policies for the whole town and sets the town into a number of character zones. However, the Statement doesn't appear to drill down enough into the individual character zones identified and provide detailed policies that could be used to guide development in those areas. It would be useful to have some form of townscape analysis map for each of the character zones which identifies important views, trees, landmark buildings etc, which are link back to the overarching policies.

The design principles are mostly focussed around preserving what is already in Oundle. Whilst this is understandable. It is important to outline what the Statement would like to encourage in terms of development, as well as what it would like to protect, in order to better preserve the town's character. One way to do this could be to highlight the specific features in each character zone that the Statement would like to see in new development –the character zones sections of the statement could be more detailed as discussed. It would also be useful to include photographs depicting what is considered to be important.

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East Northamptonshire Council - Officer response to the Regulation 14 response to the Oundle Neighbourhood Plan:

There are a number of concerns arising from the Regulation 14 consultation as follows:

Whilst it acknowledged that the Neighbourhood Plan Group have met the basic requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 in respect of pre-submission consultation and publicity there are some detailed requirements in relation to the content of the Plan and its supporting evidence through which fundamental concerns are raised, that raise object to the content and spatial direction of the Plan.

One of the basic requirements for a neighbourhood plan is that it can be evidenced that it does not breach, and is otherwise compatible with EU Regulations. To meet this condition with regard to strategic environmental assessment (SEA), a neighbourhood planning group needs to have either a statement of reasons as to why SEA is not required. No screening assessment has been published to support the Oundle Neighbourhood Plan, and the Plan has therefore failed to meet this requirement.

Whilst it is acknowledged that not every plan needs an SEA, to determine whether the neighbourhood plan requires an SEA (The Environmental Assessment of Plans and Programmes Regulations 2004), it is necessary to screen the plan to determine whether it is likely to result in significant environmental effects. However, a SEA may be required, for example, where a neighbourhood plan allocates sites for development.

No evidence has been provided to suggest this has been undertaken.

The SEA does not sit in isolation from the neighbourhood plan- the findings of the SEA might mean that amendments need to be made to the plan. Similarly the SEA environmental report may need to be updated as the neighbourhood plan evolves following consultation. If

there is no evidence that SEA has been applied to policy formulation and development then the Plan will fail to meet the basic conditions. Therefore fundamental concerns are raised as to how the policy direction has emerged.

Planning policy guidance is clear that the environmental report should be published alongside the pre-submission plan.

No screening opinion has been submitted as part of the evidence base. The Council was aware of a draft, which it had provided comments on previously. However, a number of concerns were raised in respect of some of the conclusions reached, which remain outstanding.

A draft (incomplete) screening exercise, which work had been commenced on, was previously shared with this Council; however Officers are of the opinion that this had been undertaken on a pretty advanced plan. This isn't standard / good practice and it makes the process somewhat difficult to follow as proposed policies are being referred to as possible mitigation measures.

That strategy was also highlighted as potentially having negative effects, but then justified as being the preferred approach on the basis of a 'mini-SEA'. This is not the correct legal process for SEA and if challenged would be a major weakness. If an SEA is required it must be done following the correct procedures. There is nothing wrong with looking at different sustainability topics to determine if significant effects are likely, it is even possible to look at different potential approaches that the plan could take (to conclude that no significant effects are likely irrespective of strategy). However, the screening opinion shouldn't be used to justify the preferred approach. The wording needs amending as it is confusing.

That said it is not clear why this work has not been progressed and submitted as part of the required evidence base.

Given that the Reg14 consultation is already underway, this creates of an awkward situation, should SEA be determined as necessary (which is likely), as there would be a need to revisit the strategy and site allocations.

Underlying concerns in respect of the approach to allocating housing development proposals also raise objection.

Whilst a detailed assessment of individual site proposals has been undertaken (by Maroon planning) for the neighbourhood plan; no evidence or assessment has been undertaken in respect of the spatial approach.

The proposal to allocate numerous smaller sites across the town has not been assessed against other approaches capable of delivering future housing requirements, which may be more sustainable. It is not sufficient to relate to the fact that *this is what was required by the residents from past public consultation* as evidence. The spatial approach needs to be carefully evidenced, assessed, and then the most appropriate solution/strategy taken forward.

Officer representation in the accompanying spreadsheet provides further detailed comment. The approach adopted in delivering sites results in a number of very low density proposals, without evidence or assessment of the potential impacts. Further, the “artificial phasing” of site delivery is somewhat confusing and in reality it is difficult to understand how this can be enforced.

In relation to the above objection is raised to the spatial strategy of the plan, together with the lack of evidence and assessment of alternative approaches, which may prove more sustainable.

In addition the rationale for a few topics needs strengthening. For example, heritage, biodiversity (to account for local sites, ancient woodland, the River Nene), water quality and agricultural land loss.

It should also be noted that:

- most of the plan area falls within a drinking water protected area (surface water)
- One of the allocated site is adjacent to the River Nene - there is no mention of potential effects on water quality
- One of the allocated sites is fairly large (120 dwellings) and also involves a 5ha element for a festival space. This scale of

development might trigger EIA- which is often a reason for screening SEA in.

Finally no policies map has been submitted to spatially explain the plan policies.

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
Footnote	4	Publication date for 1st draft consultation Neighbourhood Plan	It is assumed that the 22 March 2018 was the date that the Neighbourhood Plan was approved for consultation?	The actual Regulation 14 consultation date is 9 April 2018.
1.2	5	Plan period	Further explanation for the specified Neighbourhood Plan period would be helpful; namely that it corresponds to the Local Plan (Joint Core Strategy) period	New 2nd sentence: "This corresponds with the current Local Plan (North Northamptonshire Joint Core Strategy 2011-2031) period."
1.5	6	3rd bullet point	Factual update, to reflect revised LDS, agreed 23/04/2018	Final sentence revision: "...a draft version is likely to be published in 2019"
1.6	7	Figure 2 Development Plan diagram	Minor amendment, for clarity	Additional text: "...Joint Core Strategy (Part 1); ...Local Plan (Part 2)"
1.9	8	Housing Sites Assessment Background Paper	Hyperlink	It is noted that the Housing Sites Assessment Background Paper is now published on the Town Council's website to support the Regulation 14 consultation. However, the website only appears to contain the methodology paper supported by earlier consultation papers, but does NOT include the full site by site assessment. Also, it would be helpful to include a direct hyperlink from paragraph 1.9 (final sentence).
2.11	13	Formatting	Justification	Re-format final line
2.18	14	Former C of E Primary School, Milton Road	Factual update	Final sentence: Statement has been overtaken by events; as the proposals for residential development on the former Primary School site are undeliverable due to covenants restricting the use of the site to educational purposes
5.1	22	Strategic policies	National Planning Policy Framework	Additional text, 2nd sentence: "...relevant policies of the Local Plan and the National Planning Policy Framework (NPPF)"

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
5.5	23	Settlement boundary	Minor amendments, for clarity	Suggested amendments to paragraph text: "...open countryside beyond whilst planning positively for the growth of the town. The Settlement Boundary is shown on the Policies Map; it largely maintains the boundary in the current Local Plan Part 2 (the Rural North, Oundle and Thrapston Plan) but has been extended to include land allocated for development in the Neighbourhood Plan whilst addressing the plan objectives of keeping the town compact and walkable with new build development no more than a mile from the town centre."
5.6	23	Settlement boundary	Minor amendments, for clarity	Suggested amendments to 1st sentence: "...where development is regulated by stricter rural planning policies set out in the Local Plan"
O.1	23	Settlement boundary	Suggested revisions to wording	Policy wording needs significant re-writing, to reflect the purpose of the settlement boundary and provide more clarity for determining development proposals within the settlement boundary/ defined urban area. Also, policy numbering system should probably be revised; e.g. to "O1 or OU1"; as O.1 etc could give rise to confusion with decimal numbering (0.1 etc).
5.7	23	Settlement boundary	Suggested changes to supporting text, to ensure wording reflects the spirit of positive planning that is required by the NPPF	Suggested amendments to paragraph text: "...policies which seek to control the use of land manage development beyond the Plan Area. However, adequate provision has been made to meet the needs of Oundle. Therefore, proposals on land adjacent to the Settlement Boundary and outside the Plan Area will be opposed not be supported where the development would conflict with the objectives of the Neighbourhood Plan."

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
Supporting Action 1	24	Settlement boundary	Negative wording - propose that Supporting Action text should be replaced by positive wording, as suggested. The default position should be to support development proposals, unless these conflict with development policies.	Suggested amendments to text: "Oundle Town Council will oppose support development adjacent to the Settlement Boundary on land outside the Plan Area where the proposal conflicts with supports the objectives of the Neighbourhood Plan."
5.8	24	Protection of Green Spaces	Suggested additional text reference to KKP Open Space and Playing Pitch Strategy	Suggested new sentence at end of paragraph: "East Northamptonshire Council recently published the Open Space and Playing Pitch Strategy for the District (April 2017). This evaluates the quantity, quality and accessibility of existing open spaces and playing fields in the district, providing an important evidence base for the Neighbourhood Plan [https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/dev_elopment_plan_documents/9]."
5.10	24	Protection of Green Spaces	Suggested cross reference to JCS Policy 7, for clarity	Suggested new penultimate sentence: "This requirement is also reflected in the Joint Core Strategy, Policy 7."

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
O.2	26	Local Green Space	<p>Policy wording is not NPPF compliant. Suggested additional text derived from NPPF Green Belt paragraph 89, is proposed to define the special circumstances to which NPPF paragraph 76 refers.</p>	<p>Proposed additional text at end of 1st sentence, to make Policy O.2 NPPF compliant: "...except for very special circumstances such as:</p> <ul style="list-style-type: none"> - Provision of appropriate facilities to service a current use or function; or - Alterations or replacements to existing buildings or structures, provided that these do not significantly increase the size and scale of the original building" <p>Final paragraph - This is a statement of fact, so should probably be set out in the supporting text or as a footnote, rather than part of Policy O.2 itself. It would be helpful to include a supporting map showing the proposed LGS designations. It should also be noted that the LGS site assessments (evidence base) should be cross referenced (assessment against NPPF paragraph 77 criteria).</p>
O.3	27	Important Open Space	<p>Suggested changes to Policy text, to ensure wording reflects the spirit of positive planning that is required by the NPPF</p>	<p>Proposed amendment to 1st sentence and criteria 2-3: "...will be protected safeguarded from development...</p> <p>2. There is not an identified over provision...</p> <p>3. A suitable alternative site in a suitable location and of equivalent or better..."</p> <p>Criteria 4 & 5 - Suggest that these criteria are separate from points 1-3</p> <p>Final paragraph - This is a statement of fact, so should probably be set out in the supporting text or as a footnote, rather than part of Policy O.3 itself</p>

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
O.4	28	Minor Amenity Land	Suggested amendments to policy text to ensure this is positively worded and clarify that this policy relates to other amenity land (i.e. that not shown on the Policies Map)	<p>Proposed amendment to title: "Minor Other Amenity Land"</p> <p>Proposed amendments to policy text: "Proposals that would result in the loss of minor amenity land that contribute to the character and visual amenity of an area will be refused, unless supported where the benefits of development clearly and demonstrably outweigh the loss of the green space amenity land."</p>
O.5	29	Provision and Enhancement of Open Space	Suggested amendments, for clarity/ ease of reference; e.g. Proposed standards need to be evidenced against the KKP Open Space and Playing Pitch Strategy (latest evidence for open space)	<p>Proposed amendment to 1st sentence: " ...area over 0.42ha should will need to:"</p> <p>Points 3 and 4 should be separated from points 1 and 2</p> <p>The more significant Open Spaces...: It may be helpful to state that these proposals will be shown on the Policies Map?</p> <p>Final paragraph - This is a statement of fact, so should probably be set out in the supporting text or as a footnote, rather than part of Policy O.5 itself</p>

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
O.6	31	Achieving High Quality Design	Suggested amendments to policy text to ensure this is positively worded and remove repetition	<p>Proposed amendments to policy text:</p> <ol style="list-style-type: none"> 1. "New development will be expected to be of a high quality and should recognise, preserve, reinforce supported where it is of a high quality and preserves and, where possible, enhance enhances the positive and distinctive characteristics of the area..." 2. "Proposals should will need to be sensitive to the positive elements of the local context..." 3. Delete, as this effectively repeats the criterion O.6(1) and (2) above 4. Several suggested amendments, including with reference to important trees which are landscape features that should be protected anyway through TPOs etc: "Proposals should retain visually important trees and other landscape features. Exceptionally, where Where the loss of an important landscape feature is outweighed by the benefit of the development the grant of, planning permission will, where possible, be conditioned to require the replacement of the landscape feature." 5. "Proposals should incorporate appropriate landscaping works where required appropriate to soften the visual impact of the development of and enhance the quality of the environment."
5.20	31	Protecting Important Views	Suggested minor amendments, for clarity/ ease of reference	<p>Formatting - assume 2nd section of paragraph 5.20 and subsequent paragraphs will become 5.21 and 5.22 in due course, with subsequent paragraph renumbering?</p>

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
0.7	32	Protecting Important Views	Suggested wording revision, to provide additional local distinctiveness. JCS policies 3 and 8 already set overall standards for protecting views and vistas. In this way, Policy O.7 should add value to the JCS policies.	Proposed amendments to 1st paragraph, adding value to JCS policies: "Development proposals across the Neighbourhood Plan area should respect the important views, including these identified on the Policies Map."
5.24	33	Town Centre and Retail Development	Evidence base - town centre area and primary shopping frontages - Is there published evidence to demonstrate this?	2nd sentence - Is there published evidence to demonstrate this? Proposed amendments to paragraph text: "The defined town centre area and primary shopping frontages have changed very little since the boundaries were defined in the Rural North, Oundle and Thrapston Plan and it is therefore..."

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
O.8	34	Town Centre and Retail Development	<p>While the desire to maintain a retail core in Oundle town centre is recognised, it is considered that Policy O.8 tends to take on a "retail/ A1 - good; other main town centre uses bad" mantra. The need for the Plan to recognise the challenges facing town centres must be understood. It is probable that an attempt to restrict town centre uses to retailing would be economically unsustainable.</p> <p>What evidence supports the approach set out in this policy?</p>	<p>O.8(1): - Proposed amendment: "Within the primary shopping frontages defined on the Policies Map, existing retail uses should be retained..." - Who is the town centre intended to appeal to? - What is the current snapshot of town centre uses? You need this to establish what would be acceptable going forward; i.e. how would one demonstrate that a use would "add to the appeal of the town centre"?</p> <p>O.8(3): - "adopted guidance" - Oundle Town Design Statement? Oundle Conservation Area Character Appraisal? Documents to which this refers should be cross referenced. - New and altered All shop fronts should be designed in sympathy with respect the historic street setting scene and the</p> <p>Proposed additions to final sentence: "The Upper Nene Valley Gravel Pits (6km upstream of the town) have been designated as Special Protection Area/ Ramsar site as of international importance for over-wintering birds."</p>
5.26	34	Tourism	Suggested minor amendments, for clarity/ ease of reference	<p>Proposed additions to penultimate sentence: "Initiatives such as 'Destination Nene Valley', developed by the Northamptonshire Enterprise Partnership (now incorporated into the South East Midlands Local Economic Partnership), will increase people's awareness of the area..."</p> <p>Proposed new final sentence: "The Neighbourhood Plan similarly seeks to deliver these outcomes."</p>
5.27	34	Tourism	Factual update regarding Local Economic Partnership (LEP)	
5.28	35	Tourism	Suggested additional text, for clarity/ ease of reference	

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
5.29	35	Tourism	Suggested text amendments, for clarity/ ease of reference	Proposed amendments to final sentence: "Unfortunately, the Oundle Riverside Hotel, which sits just outside the Neighbourhood Plan boundary, has been unoccupied and derelict since 1986 and is unlikely to be brought back into use and the Rural North, permissions to bring this back into use and the Rural North, Oundle and Thrapston Plan (Policy 20, which proposes a range of potential acceptable alternative uses) have failed to be implemented. Increasing the number of bed and breakfast rooms within the town would help to provide could be one means to increase the provision of overnight accommodation and could help serve a market for the town's aspirations to develop into a festival location (see paragraph 5.30).
O.9	35	Bed and Breakfast and Hotel Accommodation	Suggested amendments to policy text to ensure this is positively worded/ legally robust; e.g. the reference to on-site parking and manoeuvring is dealt with through other development management policies anyway	Suggested change/ re-wording, to make policy more comprehensive - replace with the following wording: "The change of use of residential or commercial properties to provide bed and breakfast accommodation or small hotels will be supported provided that the proposal will not have a significant adverse impact on neighbouring properties and the character of the area."
O.10	36	Festival Site, Land off Benefield Road	Suggested text amendments, for clarity/ ease of reference; e.g. it might be helpful to be specific here - music festivals?	Proposed amendments: "A site of approximately 5.5ha is size... Associated development to Development should enhance the infrastructure of the site for this purpose, including the provision of utilities and car parking, shall be required. Merge 5.30/5.31 and O.10 into single site specific policy O.24 and supporting text.
5.32	36	Employment Areas	Suggested additional text, for clarity/ ease of reference	Proposed new final sentence: "Nevertheless, Fairline remains the major business and employer at Nene Valley Business Park."

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
5.33	36	Employment Areas	Suggested factual text amendments, for clarity/ ease of reference	Proposed amendments to paragraph 5.33: "The Rural North Oundle and Thrapston Plan (current Local Plan Part 2) identified a brownfield site on East Road as a location for high quality business uses. However, in 2013 an appeal on this site allowed permission was granted for the development of a Waitrose supermarket. While creating retail employment for the town, the development removed the only site identified replaced the previous site specific proposals (now defunct Policy OUN2) for high quality, predominately office employment uses.
O.11	37	Safeguarding Employment Sites	Suggested minor amendments, for clarity/ ease of reference	Proposed amendments: "...safeguarded for employment uses unless it can be demonstrated that these uses this can no longer be sustained"
5.39	38	Protecting and Enhancing Community Services and Facilities	Suggested additional text, for clarity/ ease of reference	Proposed additions to 1st sentence: "In 2015 the Town Council relocated from the Courthouse, Mill Road to Fletton House off Glapthorn Road."
5.41	38	Protecting and Enhancing Community Services and Facilities	Suggested additional text, for clarity/ ease of reference	Proposed amendments, for clarity: "In 2016 Oundle School obtained planning permission for a sports masterplan which includes for...of the school's pupils but also the wider local community."
O.12	38	Oundle School Sports Masterplan	Suggested amendments to policy text to ensure this is positively worded/ legally robust	Policy title amendment, for clarity: "Oundle School Sports and Leisure Facilities" Proposed policy text amendment: "Proposals to enhance Oundle School's sporting/leisure facilities or to provide new sporting/leisure facilities at Oundle School will be supported particularly if where such facilities will be made publicly available for use by the town as a whole."
5.43	39	Protecting and Enhancing Community Services and Facilities	Minor/ grammatical correction	Add full stop to end of final sentence

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O.13	41	The Enhancement and Protection of Community Facilities and Services	<p>Suggested changes to Policy text, to ensure wording reflects the spirit of positive planning that is required by the NPPF. Car Park references should be deleted, as these could not reasonably be regarded as community facilities. Suggest that a separate policy could be used regarding retention of existing car parks under Transport and accessibility section below.</p>	<p>Protection ofCommunity Facilities and Services"; replace "A" and "B" hierarchy criteria with bullet points.</p> <p>Proposed replacement of O.13(1), as follows: "Proposals for new and/or improved community facilities and services within, and adjacent to the urban area, as defined by the Settlement Boundary will be supported provided that the facility is appropriately located having regard to its use, size and design, accessibility, impact on traffic, the environment and neighbouring uses."</p> <p>O.13(2) - How could this be enforced through the planning system? - Amendment to 1st sentence, to ensure that the policy is sufficiently positive: " ...will only be permitted where will be supported where at least one of the following conditions is met:" - O.13(2)(A) amendments: "within, or adjacent to the urban area, as defined by the settlement boundary." Suggested deletion of 2nd sentence as this is not considered to add anything over and above the 1st part of criterion A (repetition). The emphasis should be on finding a sustainable location; e.g. proposed festival site is outside the settlement boundary, but this is clearly considered to be an appropriate location. - O.13(2)(B) amendments - Suggest that 2nd sentence should not be contained within the policy itself. Instead, this would be better placed as a footnote to O.13(2)(b); "Evidence must should..."</p> <p>List of Car Parks - Has the Highway Authority had input into this? It is assumed that these are to be shown on the Policies Map?</p>

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5.45	42	Traffic management	Suggested text amendments, for clarity/ ease of reference	Proposed amendments to 1st and 2nd sentences: "A subsequent-transport study was undertaken in 2014 to consider the impacts of future development on the town and identify measures required to mitigate these impacts. In combination, the this and earlier studies set out a range of possible incremental transport and public realm measures to maintain the character of the town..."
O.14	43	Routeing of Construction Vehicles	Questions about whether such a policy is appropriate for inclusion in a Neighbourhood Plan	Policy O.14 is not appropriate to be included as a Neighbourhood Plan. Rather, it is a supporting action/ statement of intent. Setting of conditions is a local development management standard for determining planning applications, rather than a specific policy against which a planning application should be tested.
O.15	45	Circular Cycle/ Pedestrian Network	Suggested amendments to policy text to ensure this is positively worded/ legally robust	Proposed amendments to penultimate and final sentences: " ...with the requirements of the Community Infrastructure Levy Regulations 2010, as amended, Local Plan and Policy O.26 (Developer Contributions) of the Neighbourhood Plan. Sites Subject to development viability, sites allocated for housing will be- required to provide should secure delivery of those parts of the network... "
5.53	46	Meeting Housing Requirements	Suggested text amendments, recognising that there are a great range of partners involved in implementation	References to "our development partners" (1st & 2nd sections, paragraph 5.53) - amend to refer to "development partners" / "developers" Formatting - assume 2nd, 3rd & 4th sections of paragraph 5.53 and subsequent paragraphs will be included within the overall paragraph numbering, with subsequent paragraphs renumbered accordingly?

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5.53-5.57	46	Meeting Housing Requirements	SPATIAL STRATEGY (paragraph 5.53(3))	<p>This approach raises fundamental concerns. It is not appropriate to seek to artificially constrain development through the planning system. Such an approach is considered to be fundamentally contrary to the NPPF, particularly paragraph 14 (Presumption in favour of sustainable development) and paragraph 47, which seeks to significantly boost the supply of housing land. CONCERNS REGARDING THE OVERALL SPATIAL STRATEGY (SUMMARISED AT PARAGRAPH 5.53(3)) WILL BE FULLY COVERED THROUGH A SEPARATE RESPONSE</p>
5.54	46	Housing Site Allocations	Factual update, to reflect 2017 AMR housing land supply, agreed 27/11/2017	<p>Amendments to final sentence: "...totalled 442 437 in 2016 2017. This indicates that the Neighbourhood Plan needs to allocate land for a minimum of 203 208 dwellings [Footnote/ hyperlink: 2017 North Northamptonshire Authorities Monitoring Report - calculating a five year housing land supply - Planning Policy Committee, 27 November 2017, Item 6]"</p>
5.55	46	Housing Site Allocations	SPATIAL STRATEGY	<p>This strategy of dispersal appears to be justified solely with reference to the 2014 questionnaire (i.e. "what the people prefer"). It raises questions as to whether it is the best/ most sustainable approach, given that it is likely to give rise to challenges for infrastructure delivery (e.g. the s106 contributions pooling restriction - maximum of five separate development projects) rule, set out in the 2010 CIL Regulations, as amended). Therefore this approach would need to be supported and justified by the SEA process that will need to accompany the Neighbourhood Plan.</p>

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5.56	47	Housing Site Allocations	<p>SPATIAL STRATEGY - Artificial sub-division of sites is not considered to be a sustainable or deliverable approach.</p>	<p>Amendments to paragraph 5.56, notwithstanding wider concerns regarding the spatial strategy: "The process spatial approach identified 7 sites suitable for development within one mile of the town centre within Oundle Parish. These provide opportunities to build more houses than the minimum number required in the JCS. This NP Plan also has a policy recognises the potential for windfall sites to provide additional housing in Policy O.16. We have also identified areas within the existing sites that are suitable for housing in the longer term after the Plan period and shown these on the site maps. Overall the NP Plan provides a-positive plan proposals for the growth of Oundle on a scale that will deliver significant benefits for the community as outlined in the policy for each site."</p>
5.57	47	Housing Site Allocations	<p>Suggested amendments to text, to ensure this is NPPF compliant</p>	<p>Amendments to 1st sentence: "OTC intends In order to deliver sustainable development it is critical to maintain a positive relationship with our development partners developers as they..."</p>
O.16	47	Housing site allocations	<p>SITE ALLOCATIONS</p>	<p>How has the capacity of these sites been calculated? Where is the evidence for this? It may be helpful to also specify site areas (ha). WIDER CONCERNS REGARDING THE OVERALL SPATIAL STRATEGY (SITE SELECTION/ CAPACITY (NUMBERS)) WILL BE ADDRESSED THROUGH A SEPARATE RESPONSE.</p> <p>Proposed revision to final sentence: "Preparation of comprehensive masterplans, involving Oundle Town council, the local community and other organisations for the development of each site would be supported."</p>

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5.59	48	Housing site allocations	Suggested amendments to text, in the interests of clarity	Amendments to penultimate and last sentences: "lower density housing relative to the historic town centre. OTC will continue to work with our-Development-Partners developers so the housing needs of Oundle..."
5.60	48	Housing site allocations	Suggested amendments to text, in the interests of clarity	Concerns about phrasing "older people and the disabled" - suggest alternative phrases; e.g. "vulnerable groups"
O.17	48	Housing mix	Suggested amendments to text, in the interests of clarity	Amendment to 1st sentence: "...contribute towards meeting the housing needs..." O.17(3) - Inappropriate phrasing? Is it intended that all disabled people should live in the town centre? All new houses need to meet national space standards (see JCS Policy 30) in any event. Is it proposed that a local standard for Category 3 (wheelchair accessible) housing will be introduced?
O.18	49	Windfall sites	Suggested policy deletion	O.17(4) - Repetition of JCS Policy 30(d). Not required. This policy does not appear to add anything that isn't already covered in other policies
O.19-O.20; O.22-O.24	51	Housing site allocations	SITE ALLOCATIONS	CONCERNS REGARDING THE OVERALL SPATIAL STRATEGY (SITE SPECIFIC PROPOSALS/ NUMBERS) WILL BE ADDRESSED THROUGH A SEPARATE RESPONSE. We have fundamental concerns about the approach of seeking to restrict development/ site numbers by way of artificial phasing in the ways proposed. See previous comments re Strategic Environmental Assessment.

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
5.70	53	Millers Field, Benefield Road	Suggested text amendments, for clarity/ease of reference	Amendment to 3rd sentence: " The ground The topography of the site limits its development capacity. With the exception of the Benefield Road frontage, much of the site slopes down to Lyveden Brook which forms the southern boundary."
O.21	55	Millers Field, Benefield Road	Suggested text amendments, for clarity/ease of reference; e.g. O.21(1) viewed as possibly over aspirational - policy needs re-wording?	<p>O.21(1) - "Deliver at least 12 dwellings..."</p> <p>O.21(2) - "Deliver approximately 0.55ha for allotments..."</p> <p>O.21(3) - "Ensure that views..."</p> <p>O.21(4) - "Not lead to a net increase in flood risk, including fluvial flooding along the course of the Lyveden Brook"</p> <p>O.21(5) - Should be incorporated/ merged with O.21(2)</p> <p>O.21(6) - "Provide structural landscaping incorporating informal recreational space adjacent to the Lyveden Brook..."</p> <p>O.21(7) - "Provide a new cycle and pedestrian route between the informal recreational space and Benefield Road."</p>

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
O.26	61	Land East of Cotterstock Road	<p>We have fundamental concerns about the approach of seeking to restrict development/ housing numbers in the way proposed. See previous comments re Strategic Environmental Assessment.</p> <p>In view of the Glaphorn Neighbourhood Plan Examiner's findings, there may be a case not to allocate Land east of Cotterstock Road through the Neighbourhood Plan. Its status as a potential longer term strategic development site is recognized in the current Local Plan (RNTP paragraph 8.18); therefore, if further land allocations are necessary it would be more practical for this site to come forward through the Local Plan Part 2 due to its being split between two separate Neighbourhood Plans/ areas.</p>	<p>It is noted that all sites are proposed to be "high quality" - this should be covered in the design policy in any event.</p> <p>This represents an extremely low density development. The JCS provides an indicative density of 35 dwellings per hectare for new urban extensions. Estimated capacity is approximately 90 dwellings; i.e. three times the proposed figure.</p>

Paragraph/ policy reference	Page No	Theme	Issue	Suggested amendment (where applicable)
O.26	63	Developer Contributions	Suggested amendments to policy text, to ensure this is compliant with NPPF and 2010 Community Infrastructure Levy (CIL) Regulations, as amended. While there is some duplication of JCS Policy 10, it is recognised that the policy identifies specific local priorities.	Amendments to 1st & 2nd sentences: "New development in Oundle shall be supported by the timely delivery of infrastructure, services and facilities made necessary to provide a balanced, sustainable and more self-sufficient community. Subject to development viability , financial contributions will be sought from developers..."
KEY:				
		proposed changes to individual policies		
				issues relating to site specific proposals (i.e. entire spatial strategy).