



East  
Northamptonshire  
Council

## Planning Policy Committee 30 September 2019

### Oundle Neighbourhood Plan 2011-2031 – Regulation 16 Feedback

#### Purpose of report

The Oundle Neighbourhood Plan was submitted for examination on 24 May 2019. This report provides feedback from the subsequent consultation under the Neighbourhood Planning (General) Regulations 2012, as amended (Regulation 16), which took place between 12 July and 27 August 2019.

#### Attachment(s)

Appendix 1: Regulation 15 Legal check letter

#### 1.0 Background

- 1.1 Since the 2011 Localism Act and Neighbourhood Planning (General) Regulations 2012 (as amended) were implemented a number of Town/ Parish Councils across the District have taken up the opportunity of Neighbourhood Planning. Since 2012, Oundle Town Council has been working to produce a Neighbourhood Plan for the Parish of Oundle.
- 1.2 Oundle Parish area was designated a Neighbourhood Area on 17 July 2013. This was followed by extensive consultations and public engagement, culminating in publication of the 1<sup>st</sup> draft (Regulation 14) version Oundle Neighbourhood Plan in April 2018 (consultation undertaken by Oundle Town Council, 9 April – 21 May 2018, inclusive).
- 1.3 Following the Regulation 14 consultation, the Town Council and appointed Neighbourhood Planning Group reviewed the feedback and in response appointed a consultant to prepare a full Sustainability Appraisal. This ensured that the statutory requirements were fulfilled (see Appendix 1), allowing for the Oundle Neighbourhood Plan to be submitted for examination to this Council on 24 May 2019.
- 1.4 Submission of the Plan was followed by consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, as amended. This report sets out summary feedback from the Regulation 16 consultation for the Oundle Neighbourhood Plan, which finished on 27 August 2019.

#### 2.0 Regulation 16 consultation

- 2.1 On 24 May 2019, Oundle Town Council (the statutory Qualifying Body) submitted a suite of documents which, combined, form the Oundle Neighbourhood Plan “plan proposal”. These submission documents consist of:
  - Basic Conditions Statement and Consultation Statement, plus the Plan itself
  - Equalities Impact Assessment (EIA) and
  - Habitat Regulations Assessment (HRA) screening opinions were also prepared, together with a full Sustainability Appraisal; required to fulfil the 2004 Strategic Environmental Assessment (SEA) Regulations

Correspondence from the Environment Agency, Historic England and Natural England confirmed that the Sustainability Appraisal fulfils the statutory requirements. On 9 July,

East Northamptonshire Council wrote to the Town Council<sup>1</sup> (see also Appendix 1) to confirm that the submission documents fulfil the statutory requirements.

2.2 Submission of the draft Neighbourhood Plan required the Local Planning Authority to:

- Carry out a six weeks consultation under Regulation 16, on behalf of Oundle Town Council; then
- Appoint an independent Examiner, to assess the draft Neighbourhood Plan against the “basic conditions”; the Neighbourhood Development Plan tests.

2.3 During the Regulation 16 consultation, which took place from 12 July – 27 August 2019, inclusive, 234 separate responses were received:

- 28 email or hard copy responses (plus two late emails);
- 47 completed “Smart Survey” online form responses; and
- A further 187 partial/ incomplete Smart Survey responses (many of which were repeat use of the online form, or where the respondent opted to send an email representation).

2.4 Many responses were single representations. However, a number of responses contained multiple feedback regarding different aspects of the Oundle Neighbourhood Plans. Sections 3.0-6.0 below provide respective summary feedback, subdivided into the following categories of stakeholders:

- Statutory consultees; e.g. Northamptonshire County Council, specific consultation bodies, utilities bodies;
- Oundle Town Council;
- Non-statutory consultees; e.g. local groups, landowners/ site promoters;
- Residents of Oundle.

### 3.0 Statutory consultees

3.1 Representations were received from the following statutory consultation bodies:

- Anglian Water;
- Environment Agency (EA);
- National Grid;
- Natural England;
- Northamptonshire County Council (NCC) – Development Management; Estates/ Property; Lead Local Flood Authority (LLFA); Northants Adult Social Care; Northants Fire and Rescue.

3.2 **Anglian Water, the EA and the LLFA** all submitted site specific comments regarding the proposed site allocations (policies O18-O22). Anglian Water highlighted a need to incorporate amendments to policy text for site allocations, previously agreed through the 2018 Regulation 14 consultation. Anglian Water, the EA and LLFA have also sought additional site specific policy criteria at policies O18-O22, regarding flood risk/ water management assets, fluvial and surface water flooding, and sustainable drainage systems (SuDS).

3.3 Specifically, the EA and LLFA have objected to policies O18 (Land south of Herne Road) and O20 (Land Adjacent to Cemetery, Stoke Doyle Road), as these were not considered to give sufficient consideration to parts of each site being situated within EA Flood Zone 3. It was also argued that the Neighbourhood Plan does not give sufficient consideration to published flood risk evidence and strategies; namely the Strategic Flood Risk Assessment, Oundle Pathfinder II Project and Local Flood Risk Management Strategy. The EA also sought National Flood Risk Activity Permits for

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<sup>1</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11395/oundle\\_np\\_legal\\_check\\_letter](https://www.east-northamptonshire.gov.uk/downloads/file/11395/oundle_np_legal_check_letter)

developments within 20m of a designated main river, noting that the Water Framework Directive requires that development should not cause further water quality deterioration.

3.4 **The National Grid, Natural England, Northants Adult Social Care, and Northants Fire and Rescue** have not objected to the Neighbourhood Plan. The National Grid and Natural England also provided generic guidance and information about their statutory roles.

3.5 **NCC Development Management** highlighted the need to recognise the impacts of proposed development upon existing infrastructure. It emphasised the increasing importance of Super-fast Broadband, also stressing a need for the proposed site allocations (policies O18-O22) to give consideration to development contributions such as fire/ rescue and libraries.

3.6 **NCC Estates/ Property** (represented by Peter Brett Associates) objected to the proposed designation of the County Council's Fletton Field site as Local Green Space (LGS). The proposed LGS designation was challenged on the basis of a lack of clear evidence base and justification.

#### 4.0 **Oundle Town Council**

4.1 Oundle Town Council submitted a detailed representation in response to the Regulation 15 legal check letter (Appendix 1). The Town Council's representation sought to address and respond to this Council's initial comments regarding the submitted Neighbourhood Plan. In particular, the Town Council has challenged the findings of East Northamptonshire Council's: "Sustainability assessment of potential development sites in Oundle" (DLP, July 2019<sup>2</sup>).

4.2 The Town Council's response is considered to be a supporting representation to the Neighbourhood Plan. It takes the form of a "proof of evidence" and will be presented to the Plan examiner accordingly.

#### 5.0 **Non-statutory consultees**

5.1 Responses were submitted by a number of non-statutory consultees. These were either local interest groups and/ or site promoters:

- Oundle Recreation & Green Spaces Community Group;
- Landowners/ promoters of site O19 (Millers Field, Benefield Road) – represented by Turley;
- Landowners/ promoters of site O20 (Land Adjacent to Cemetery, Stoke Doyle Road) – David Wilson Homes;
- Landowners/ promoters of sites O21 and O22 (Land South of Wakerley Close and Land north of Benefield Road) – Biggin and Benefield Estate, represented by Mike Sibthorp;
- Landowners/ promoters of land adjacent to site O20 (Land Adjacent to Cemetery, Stoke Doyle Road) – represented by Brown & Co;
- Landowners/ promoters of Land east of Cotterstock Road (deleted from 1<sup>st</sup> draft version Neighbourhood Plan) – Gladman Developments Ltd;
- Landowners/ promoters of Land east of St Christopher's Drive (deleted from 1<sup>st</sup> draft version Neighbourhood Plan) – Persimmon Homes;
- Oundle School (late representation).

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<sup>2</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability\\_assessment\\_of\\_potential\\_development\\_sites\\_in\\_oundle\\_july\\_2019](https://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potential_development_sites_in_oundle_july_2019)

- 5.2 Oundle Recreation & Green Spaces Community Group submitted a representation supporting the proposed Local Green Space Designations (8 sites).
- 5.3 The promoters of sites O19-O22 have all submitted overarching supporting representations. While submitted as supporting representations these raised the following concerns/ issues:
- Detailed changes to policy criteria wordings;
  - Site O19 (Millers Field, Benefield Road) – objection to proposed Local Green Space designation for non-developed part of the site;
  - Site O20 (Land Adjacent to Cemetery, Stoke Doyle Road) – need to amend site boundary, to include land west of Warren Bridge;
  - Site O21 (Land South of Wakerley Close) – owners/ promoters would not object to increased capacity/ density, but need to maintain undeveloped margin adjacent to watercourse;
  - Site O22 (Land North of Benefield Road) – need to reinstate 1<sup>st</sup> draft (Regulation 14) version of proposed site allocation.
- 5.4 The representatives of adjacent landowners to site O20 have (like David Wilson Homes, the promoters), sought the inclusion of land west of Warren Bridge (east of the proposed site) within the allocation. They have also sought extension of the site to the west, as far as footpath (public right of way) UF3.
- 5.5 Persimmon Homes and Gladman Developments Ltd, promoters of the St Christopher's Drive and land east of Cotterstock Road respectively, have objected to the Neighbourhood Plan site allocations on the basis of the site selection process. Persimmon argues that the Plan fails to meet the basic conditions, with reference to national policies, strategic policies and the Strategic Environmental Assessment (SEA) process. Gladman has similarly asserted that the Plan conflicts with strategic policies, arguing that there is a lack of evidence to justify deletion of the St Christopher's Drive and land east of Cotterstock Road sites, and that there are inconsistencies in the Sustainability Appraisal. Gladman also argues that the deletion of the two sites entailed a repeat Regulation 14 (draft Neighbourhood Plan) consultation before the Plan was submitted.
- 5.6 Oundle School (represented by Berrys) and Historic England submitted late representations (2 and 10 September, respectively). Oundle School objected to the proposed cycle ways and walkways across private school land, raising concerns about safeguarding issues; while Historic England reiterated its earlier (Regulation 14) consultation response.

## **6.0 Residents of Oundle**

- 6.1 A large number of representations (58, out of 75 completed Regulation 16 responses) were submitted by residents of Oundle. Many of these submissions are supporting representations. In some cases, representations raised particular issues or concerns, while others object to specific aspects of the Neighbourhood Plan. This section summarises the main issues raised.

### **6.2 Supporting representations**

Large numbers of supporting residents' representations were received. These expressed support for the Oundle Neighbourhood Plan for the following reasons:

- Spatial development strategy; seeking to allocate development land within 1 mile of the town centre;
- Deletion of the St Christopher's Drive and land east of Cotterstock Road sites from the Plan, citing concerns such as localism, flood risk, implications for schools, traffic, sewerage and safety, and challenging East Northamptonshire Council's site selection evidence base (particularly DLP site assessment, July 2019);

- Contribution of proposed LGS site designations to local quality of life, particularly Fletton Fields, Glapthorn Road.

### 6.3 **Objections**

Supporting representations were balanced by several objections. Three representations objected to the overall scale/ quantum of development; citing transport impacts, opportunities for securing developer contributions, and arguing that the Neighbourhood Plan site allocations are unsustainable. A further response expressed concerns about the risk of flooding from Lyveden Brook for sites O20 (Land Adjacent to Cemetery, Stoke Doyle Road) and O21 (Land South of Wakerley Close).

6.4 In addition to generic representations objecting to the overall scale of development, 11 site specific objections regarding Land South of Herne Road (O20) were received. These raised the following issues:

- Loss of greenfield land;
- Contrary to spatial development strategy – extends beyond 1 mile radius of town centre;
- Scale of development – three-fold increase to housing numbers from 1<sup>st</sup> draft (Regulation 14) version Neighbourhood Plan;
- CO<sub>2</sub> emissions;
- Existing problems with traffic to/ from Prince William School;
- Additional traffic generation on Herne Road (cul de sac);
- Access arrangements – need for new direct access from A605 Bypass;
- Proposed building standards.

6.5 One resident, while expressing support for the Plan as a whole, raised concerns about the Regulation 16 consultation process. This representation highlighted that the consultation is unclear and there is little opportunity to submit supporting representations.

## 7.0 **Conclusions**

7.1 The range of representations received during the Regulation 16 consultation for the Oundle Neighbourhood Plan (12 July – 27 August 2019, inclusive) varied greatly. Many residents submitted supporting representations, although a number of site specific objections were received (particularly regarding Land South of Herne Road, site O20), citing site specific concerns such as transport and flood risk.

7.2 Promoters of the St Christopher's Drive and land east of Cotterstock Road (alternative) sites submitted detailed representations in response to the decision to remove these sites from the Neighbourhood Plan. These challenged the Plan with reference to the basic conditions; e.g. conformity with national and strategic planning policies.

7.3 An examiner for the Oundle Neighbourhood Plan has recently been appointed. All Regulation 16 representations will be passed on to the examiner and these will be used to inform the independent examination of the Plan. This is anticipated to run from September – December 2019 and is normally dealt with by written representations, although the examiner could determine that an informal hearing is needed to resolve the issues highlighted.

## 8.0 **Equality and Diversity Implications**

8.1 There are no equality and diversity implications arising from this report. Neighbourhood Plans must be supported by Equalities Impact Assessments, which should ensure compliance with the relevant equalities and Human Rights legislation.

## **9.0 Legal Implications**

9.1 The Oundle Neighbourhood Plan has been prepared in accordance with the Neighbourhood Planning (General) Regulations 2012, as amended. The subsequent examination and referendum will be undertaken in accordance with these and associated regulations. Given that this report is provided for information only, there are no legal implications arising from it.

## **10.0 Risk Management**

10.1 At the meeting of the Planning Policy Committee held on 29 July 2019 the Committee resolved to defer the proposed Local Plan housing site allocations for Oundle until the outcome of the examines report into the Oundle Neighbourhood Plan was published. This resolution has implications in respect of the progression of the Local Plan, which is subject to a separate report on this agenda.

## **11.0 Resource and Financial Implications**

11.1 The Government (Housing, Communities and Local Government) provides £20,000 to the local planning authority for each Neighbourhood Plan to cover the cost of each referendum, upon successful completion of the neighbourhood planning examination. If the Oundle Neighbourhood Plan is successfully passed at examination this will be the trigger for the payment of £20,000 to cover the costs of the forthcoming referendum (anticipated to take place in early 2020).

## **12.0 Constitutional Implications**

12.1 Day to day matters of Planning Policy, including providing proactive guidance and/ or comments by East Northamptonshire Council regarding emerging Neighbourhood Plans, have already been delegated to the Planning Policy Committee. As such, there are no constitutional implications arising from the proposals.

## **13.0 Implications for our customers**

13.1 There are no customer service implications arising from this report.

## **14.0 Privacy Implications**

14.1 The Regulation 16 consultation was undertaken in accordance with the requirements of the 2018 Data Protection Act. Further correspondence with individuals regarding subsequent stages in the Oundle Neighbourhood Plan (e.g. publication of the examiner's report) will also comply with data protection legislation.

## **15.0 Corporate Outcomes**

15.1 The relevant Corporate Outcomes are:

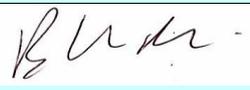
- Good Quality of Life – Delivery of delivery of regeneration, economic development, sustainable development and strong communities;
- Effective Partnership Working – Effective joint working with Neighbourhood Planning bodies;
- Effective Management – Applying the necessary expertise to ensure that Neighbourhood Plans are legally compliant.

**16.0 Recommendation**

16.1 This report is presented to Members for information. The Committee is therefore recommended to:

- (1) Note the current stage in preparation of the Oundle Neighbourhood Plan 2011-2031 and the summary of Regulation 16 consultation representations at sections 3.0-6.0, above.

*(Reason – To support the Oundle Neighbourhood Plan through its forthcoming examination)*

<b>Legal</b>	Power:	<b>Town and Country Planning Act 1990 (Amended by the Localism Act 2011)</b> <b>Neighbourhood Planning (General) Regulations 2012 (as amended)</b> <b>Environmental Assessment of Plans and Programmes Regulations 2004</b> <b>Conservation of Habitats and Species Regulations 2017</b> <b>Data Protection Act 2018</b>			
	Other considerations:	N/a			
<b>Background Papers:</b>	Sustainability assessment of potential development sites in Oundle (July 2019): <a href="https://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potential_development_sites_in_oundle_july_2019">https://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potential_development_sites_in_oundle_july_2019</a>				
<b>Person Originating Report:</b>	Michael Burton, Principal Planning Policy Officer ☎ 01832 742221 ☒ <a href="mailto:mburton@east-northamptonshire.gov.uk">mburton@east-northamptonshire.gov.uk</a>				
<b>Date: 23 September 2019</b>					
<b>CFO</b>		<b>MO</b> 19/09/19		<b>CX</b> 18/09/19	

## Appendix 1: Regulation 15 Legal check letter



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### By email:

Emma Baker (Clerk, Oundle Town Council): [REDACTED]  
Cllr Peter Peel (Oundle Neighbourhood Plan Group): [REDACTED]

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Please ask for	Tel	Our Ref.	Your Ref.	Date:
Michael Burton	01832 742221	MB/ONP-Reg15		9 July 2019

Dear Emma and Peter

### **Draft Oundle Neighbourhood Plan 2011-2031, submitted 24 May 2019: Legal Check under Schedule 4B of the Town and Country Planning Act 1990**

I write to you on behalf of East Northamptonshire Council (ENC) to confirm our receipt of the submission version of your draft neighbourhood development plan (the Oundle Neighbourhood Plan 2011-2031), along with accompanying supporting documentation. Firstly, I would like to wholeheartedly congratulate the Oundle Neighbourhood Plan Group (ONPG) on successfully reaching the submission stage in the neighbourhood planning process.

As you may be aware, under Paragraphs 5 and 6 of Schedule 4B of the Town and Country Planning Act (TCPA) 1990 there is now a requirement for ENC, as the local planning authority, to undertake a check of the compliance of the plan along with its process to date. The relevant legal tests are set out in the 1990 TCPA and relevant sections of the Planning and Compulsory Purchase Act (PCPA) 2004. It is then an obligation of the local planning authority to issue a written statement clarifying the compliance (or otherwise) of the plan. Accordingly, this letter comprises the formal view of ENC and recommends whether it should be submitted for independent examination.

At this stage it is not a duty of the local planning authority to consider the plan proposal against the 'basic conditions' tests set out under Paragraph 8(2) of the TCPA 1990 (this is the role of the independent examiner). Nevertheless, I can confirm that whilst ENC is of the opinion that the draft Neighbourhood Plan is in general conformity with relevant national and local strategic policy it does however raise issues of concern in relation to compliance with extant strategic policy, as set out below in the Council's initial review of the submission.

With regards to the relevant EU obligations (specifically, SEA Directive 2001/42/EC), the Plan and supporting documents, as submitted on 24 May 2019, did not fulfil a requirement of The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No 1633); the Strategic Environmental Assessment (SEA) regulations (Regulation 12). In order to comply with this statutory requirement, we consulted the relevant consultation bodies (Environment Agency, Historic England and Natural England) regarding the Sustainability Appraisal (SA) Report, over a 5-week period (31 May – 5 July 2019, inclusive). The respondents confirmed that the Sustainability Appraisal fulfils the requirements of the SEA regulations.

I note that your submissions also include the Basic Conditions Statement, which provides your detailed consideration of the plan submission against the requirements of the TCPA 1990 and the PCPA 2004. In a similar manner, I am pleased to confirm the following on behalf of ENC:

- The plan **DOES** accord with all relevant provisions of the PCPA 2004 in that it: specifies a plan period; does not include any provision for excluded development; and does not relate to more than one neighbourhood area;
- The plan **DOES NOT** comprise a 'repeat proposal' as defined under Paragraph 5 of the TCPA 1990;
- The plan **HAS** been prepared by a qualifying body (Oundle Town Council) who are authorised to deliver a neighbourhood plan;
- The submission **DOES** comprise the relevant documentation required under Paragraph 1 of Schedule 4B of the TCPA 1990 and as prescribed by Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ('the Regulations');
- The statutory consultation undertaken to date **DOES** comply with the requirements and regulations set out under Paragraph 4 of the TCPA 1990 and as prescribed by Regulation 14 of the Regulations; and
- The plan **DOES** comply with all other provisions under section 61E(2), 61J and 61L of the TCPA 1990.

To assist the process, I have also briefly prepared an initial check (attached as an annex to this letter), highlighting instances where, in my professional opinion, there is a possibility that the draft Plan could be challenged with reference to the Basic Conditions.

**The Oundle Neighbourhood Plan will now be publicised under Regulation 16 of the 2012 Neighbourhood Planning (General) Regulations, as amended. Following this, the plan will be made available for independent examination.**

ENC is now required to publicise the Neighbourhood Plan along with details of how to make representations to it on its website for a minimum of 6 weeks. In accordance with Regulation 16, consultation will take place from **Friday, 12 July – Tuesday, 27 August 2019** inclusive (6 weeks).

Alongside this the Council can assist in publicising and consulting on the plan to ensure the regulations and the Council's Statement of Community Involvement are properly met. Alongside the Regulation 16 consultation we will begin the process for the appointment of an independent examiner for the Oundle Neighbourhood Plan, who will start the examination during **September/ October 2019**; soon after the end of the Regulation 16 consultation.

Finally, on behalf of ENC this letter represents the Council's formal view that the draft Oundle Neighbourhood Plan, as submitted and covering the remainder of the current Local Plan period to 2031, complies with all of the relevant statutory requirements. Please do not hesitate to contact me if you have any further queries regarding the neighbourhood planning process from hereon.

Yours sincerely

Michael Burton  
Principal Planning Policy Officer

## East Northamptonshire Council

### Oundle Neighbourhood Plan – submitted 24 May 2019 (Regulation 15, Neighbourhood Planning (General) Regulations 2012, as amended)

#### Initial review of the submission version Neighbourhood Plan, to accompany Legal Check under Schedule 4B of the Town and Country Planning Act 1990

Paragraph/ Policy number in Plan	ENC comments
Paragraph 1.8-1.9	<p><b>Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment</b></p> <p>A major challenge in preparing the draft Oundle Neighbourhood Plan for submission has arisen through the need to ensure compliance with the 2004 Strategic Environmental Assessment (SEA) Regulations.</p> <p>It would be helpful to insert a timeline following paragraph 1.9, to explain the key milestones for the SEA/ Sustainability Appraisal (SA) process; e.g.:</p> <ul style="list-style-type: none"> <li>• <b>November/ December 2018</b> – SEA screening process undertaken, which confirmed that a full SA would be required</li> <li>• <b>January/ February 2019</b> – Oundle Town Council consulted with SEA consultation bodies (Environment Agency, Historic England and Natural England) regarding the SEA screening opinion</li> <li>• <b>March – May 2019</b> – Preparation and publication of full draft SA report</li> <li>• <b>May – July 2019</b> – Consultation with SEA bodies re draft SA report</li> </ul>
Paragraph 1.11	<p><b>Evidence base, Community Engagement and Consultation</b></p> <p>Suggested cross reference to Statement of Consultation at the end of paragraph: “<i>Further details of these events is set out in the Statement of Consultation [web link]</i>”.</p>

Paragraph/ Policy number in Plan	ENC comments
Paragraph 2.16	<p><b>1<sup>st</sup> sentence</b> Editorial/ minor change – typographical errors in paragraph 2.16 needs re-wording.</p>
Paragraph 2.18	<p><b>State Schools</b> Paragraph 2.18 explains the current position regarding the potential for redevelopment of the former Milton Road primary school site. It is probably better to state, more generically, that covenants restrict the redevelopment/ re-use of the former primary school site to educational uses.</p>
Paragraph 2.22	<p><b>Services and Facilities</b> Paragraph 2.22 states that Oundle still has two banks. Please confirm if this is still the case (or possible closure dates, where applicable), so that the text can be factually updated.</p>
Policy O1	<p><b>The Settlement Boundary</b> In defining a settlement boundary, it is important to ensure that the boundary is applied consistently. It is important to note that the current Local Plan Part 2 (Rural North, Oundle and Thrapston Plan/ RNOTP) settlement boundaries pre-date the National Planning Policy Framework and are therefore now outdated. The “Braesby” appeal decision (Glaphorn: APP/G2815/W/16/3149683, 11 August 2016) highlighted a need to review settlement boundaries if there is a desire to retain or designate these in a Neighbourhood Plan.</p> <p>In the cases of Brigstock, Glaphorn, King’s Cliffe and Warmington; these respective Neighbourhood Plans all sought to retain the settlement boundaries from the RNOTP. In all cases however, they were required to review these through the Neighbourhood Plan preparation process.</p> <p>It is noted that the Oundle boundary has been reviewed to take account of the proposed housing land allocations. However, we do raise a number of concerns about how the boundary has been applied:</p> <ol style="list-style-type: none"> <li>1. To the north of the town, the boundary on the draft policies map includes parts of the Oundle area that are situated within Glaphorn Parish. This raises some possible legal issues, although it is recognised that the practical application of a settlement boundary would entail this. This issue could be overcome by a clear statement that the boundary, where this falls within Glaphorn Parish, is shown as indicative on the policies map, for the purposes of completeness and interpretation, although it lies beyond the designated Neighbourhood Area.</li> <li>2. Around the Prince William School buildings it is noted that the</li> </ol>

Paragraph/ Policy number in Plan	ENC comments
	<p>previous RNOTP settlement boundary has been retained. It is asserted that this is outdated given that a number of school buildings have, in the decade since the boundary was drawn, been developed beyond the defined boundary. This has implications for the status of the land to the north and south of Prince William School within the A605 bypass.</p> <p>Attention is drawn to the settlement boundary criteria in the RNOTP (current Local Plan Part 2, paragraph 4.5). Given the expansion of the Prince William School buildings to the east within the last 8-10 years, we consider that this site should be included within the settlement boundary, given that it is “<i>bounded by existing or committed development on all sides but one</i>” (RNOTP paragraph 4.5(e)). This criterion, which pre-dates the NPPF, is proposed for modification in the emerging Local Plan Part 2 (EN2), in accordance with the adopted North Northamptonshire Joint Core Strategy (JCS) 2011-2031. The latter specifies that land is considered as falling within main built up areas where bounded by built curtilages on at least <b>two</b> sides (paragraph 5.17). This is less stringent than the earlier equivalent (RNOTP) criterion, which refers to “all sides but one”.</p> <p>Furthermore, the draft Local Plan Part 2, which will entirely replace the RNOTP in due course, states that: “<i>infill development will generally be supported in the urban areas where it...is unlikely to be of any beneficial use as open land, including for agriculture</i>” (Policy EN2(f)). Within the past decade, the area around Prince William school has been, and is proposed to be, subject to significant urban intensification; in particular the proposed Neighbourhood Plan site allocation to the south of Herne Road. It is considered that the impact of this development will significantly alter the character of this part of the town.</p> <p>Overall, it is considered that if the settlement boundary criteria are correctly applied, then the St Christopher’s Drive site (proposed in the Local Plan Part 2) forms a part of the existing built up area. This is surrounded on three out of four sides by built development, and on the 4<sup>th</sup> (eastern boundary) by the A605 bypass. Furthermore, it has no function as public open space or agricultural land, so should also be included within the settlement boundary in accordance with the relevant criterion (JCS paragraph 5.17/ Local Plan Part 2 Policy EN2(f)).</p> <p>Finally, we raise some concerns regarding the wording of Policy O1; e.g. reference to compliance with rural policies, as opposed to other plan policies. It is suggested that the policy should be re-worded in the interests of clarity.</p>

Paragraph/ Policy number in Plan	ENC comments
Policy O3	<p><b>Important Open Space</b> Proposed amendments to 2<sup>nd</sup> paragraph/ section, in the interests of clarity: <i>“Planning permission may be granted for a small, ancillary building on an area of Important Open Space where related to <b>the existing sports provision on functions of the site</b>”.</i></p>
Policy O4	<p><b>Other Amenity Land</b> Proposed amendments, in the interests of clarity: <i>“Proposals that would result in the loss of amenity land that contribute to the character and visual amenity of an area will <b>only</b> be supported where <b>it can be demonstrated that the benefits of development clearly and demonstrably outweigh the loss of the amenity land</b>”.</i></p>
Policy O5	<p><b>The Provision and Enhancement of Open Space</b> Proposed amendments to criterion (2), in the interests of clarity: <i>“Make provision for the long-term management of <b>new open spaces made necessary by the provided as part of new developments</b>”.</i></p> <p>It should be noted that the emerging Local Plan Part 2 proposes lower thresholds than those used in the Neighbourhood Plan. However, it is noted that the standards proposed in the latter are taken from strategic policies of the adopted Local Plan.</p> <p>The proposed Millers Field wildlife area needs to also be included as a criterion within Policy O19.</p>
Policy O6	<p><b>Achieving high quality design</b> Criterion (2) – Add reference to the quantum of outside amenity space to 2<sup>nd</sup> criterion.</p>
Paragraph 5.31/ Policy O10	<p><b>Site for Leisure and Recreation, Land off Benefield Road</b> For clarity, it may be appropriate to emerge Policy O10 into O22, but include cross reference at paragraph 5.31.</p>
Paragraph 5.35/ Policy O11	<p><b>Safeguarding Employment Sites</b> Proposed amendments, in the interests of clarity:</p> <p>Paragraph 5.35: <i>“Policy O11 therefore safeguards key employment areas unless it can be demonstrated that there is no reasonable prospect of the site being used for employment purposes <b>existing employment uses being sustained</b>”.</i></p> <p>Policy O11: <i>“Existing employment sites at Nene Valley Business Park, East Road and the Wharf, shown on the Policies Map, will be safeguarded for employment unless it can be demonstrated that <b>this can no longer be sustained there is no reasonable prospect of the site being used for employment purposes</b>”.</i></p>

Paragraph/ Policy number in Plan	ENC comments
Paragraph 5.42/ Policy O13	<p><b>The Enhancement of Community Facilities and Services</b> Policy O13 includes reference to Car Parks as “community facilities and services”.</p> <p>Town centre car parking should be dealt with through a separate policy. The final paragraph of Policy O13 does explain the approach for including car parking within the policy. However, for clarity it would be more appropriate to move this explanatory text into the supporting text for a new car parking policy.</p>
Paragraphs 5.53-5.85	<p><b>Meeting Housing Requirements</b> The approach to site selection/ allocation has proven to be the most challenging aspect of the Oundle Neighbourhood Plan process.</p> <p>This sub-section of the Neighbourhood Plan document needs to provide a clear explanation/ executive summary, outlining the site shortlisting/ selection process. It is important that the Oundle Neighbourhood Plan is clearly evidenced. Feedback regarding individual paragraphs/ policies is set out below.</p> <p>Within the chosen sites, it may be appropriate to consider whether these would be appropriate to accommodate specialist housing.</p>
Paragraph 5.55	<p><b>Introduction</b> It is advised that the Neighbourhood Plan should contain a clear web link to the Housing Methodology paper.</p>
Paragraph 5.56	<p><b>Housing Site Allocations</b> The explanatory text regarding the residual housing requirements (paragraph 5.56) is based upon outdated data. The latest housing land position, as at 1 April 2018, is set out in East Northamptonshire Council’s Housing Background Paper, June 2019 (Planning Policy Committee 10 June 2019, Item 5 Appendix 3<sup>1</sup>).</p> <p>Paragraph 5.56 should therefore be updated, as follows: “<i>Policy 29 (Distribution of new homes) of the Joint Core Strategy requires Oundle to accommodate 645 new dwellings between 2011 and 2031. Existing commitments (i.e. homes completed since 2011 and dwellings which are on sites allocated in a Local Plan or have planning permission but have yet to be either completed or started) totalled <del>437</del> 574 at 31<sup>st</sup> March 2018. This indicates that the Neighbourhood Plan needs to allocate land for a minimum of <del>208</del> 172, or 242 dwellings if remaining site allocations from the</i></p>

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<sup>1</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/964/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/964/planning_policy_committee)

Paragraph/ Policy number in Plan	ENC comments
	<b><i>current Local Plan Part 2 (Rural North, Oundle and Thrapston Plan) – for which deliverability is uncertain – are excluded<sup>2</sup>.</i></b>
Paragraph 5.58	<p><b>Housing Site Allocations</b> Paragraph 5.58 provides a brief generic explanation of the spatial approach. It does not, however, provide sufficient explanation of the site shortlisting process.</p> <p>The supporting text (in/ around paragraph 5.58), needs to cover the following:</p> <ul style="list-style-type: none"> <li>• No of sites initially assessed; then</li> <li>• No of sites shortlisted; and finally</li> <li>• A generic explanation as to why shortlisted sites were excluded; e.g. due to particular constraints.</li> </ul> <p>While it will not be necessary to specify individual sites that the Neighbourhood Plan is not proposing to allocate (this will be set out in the supporting SA/ Housing Methodology reports), the draft text should provide a succinct non-technical summary for the site selection process with the necessary headlines (e.g. No of sites discounted).</p> <p>It is important that the Neighbourhood Plan is supported by both the site assessment (Housing Methodology) paper (quantitative) and a further justification to explain how the site assessment data is translated into policy; i.e. site selection.</p>
Policy O15	<p><b>Oundle housing site allocations</b> Four concerns are raised regarding the chosen site allocations:</p> <ol style="list-style-type: none"> <li>1. Site selection/ consultation process;</li> <li>2. Deliverability of selected sites;</li> <li>3. Conformity with strategic policies; and</li> <li>4. Housing density.</li> </ol>
Policy O15	<p><b>Site selection/ consultation process</b> Concerns are raised about both the choice of sites and the process for site discounting. The 1<sup>st</sup> draft (Regulation 14) version of the Neighbourhood Plan (April 2018) proposed the allocation of seven sites, but sought to artificially constrain or restrict the extent of certain proposed sites.</p> <p>The submission version Plan has deleted two sites from the previous version of the Neighbourhood Plan – Cotterstock Road and St Christopher’s Drive – offset by an increase in numbers at Land</p>

<sup>2</sup> Housing Background Paper – Housing Requirement for the Local Plan Part 2 (Urban), June 2019:  
[https://www.east-northamptonshire.gov.uk/meetings/meeting/964/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/964/planning_policy_committee)

Paragraph/ Policy number in Plan	ENC comments
	<p>south of Herne Road. It is noted that the SA report does provide a rationale/ justification for this decision; in both cases predominantly related to highways/ access issues (Table 10).</p> <p>While it is accepted that the SA report provides an audit trail for the decision to discount the two sites from the 1<sup>st</sup> draft version of the Neighbourhood Plan this does raise issues around the Plan preparation process. It is accepted that the Oundle Neighbourhood Plan has been prepared in accordance with the requirements of the 2012 Regulations.</p> <p>However, questions are raised as to whether the decision to delete two sites in the submission version of the Plan without further consultation would fulfil the spirit of the Statement of Community Involvement<sup>3</sup> (SCI), adopted December 2013 and currently being updated. The replacement SCI repeats the 2013 version, stating that: <i>“A key aim of consultation and engagement is to attempt to build consensus for the way forward in relation to development ... Whilst it is accepted that full consensus may not be possible, greater understanding may help minimise conflict in plan preparation”</i> (paragraph 4.3).</p> <p>The deletion of two sites and consequent increase of capacity at Land south of Herne Road (increasing from 45 to 120 dwellings) represents a significant change to the overall strategy. Accordingly, it is questioned whether the decision to delete previously proposed sites <b>without</b> further consultation prior to submission represents an appropriate approach to building consensus, as required by the Statement of Community Involvement. This decision could arguably increase conflict in the plan-making process; evidenced by local objections already being made to additional development at Herne Road.</p>
Policy O15	<p><b>Deliverability of selected sites</b></p> <p>The SA Report does appear to provide an objective assessment of four alternative approaches, together with a justification for the site selection process. What the SA does not however cover, is the achievability (i.e. deliverability) of individual sites.</p> <p>While the proposed Neighbourhood Plan sites are arguably all developable (i.e. identified by way of due process through the SA Report), the SA Report (as this is beyond its remit) does not include any consideration of achievability or deliverability. The Cotterstock Road and St Christopher’s Drive sites, proposed in the Local Plan Part 2, but ultimately rejected in the submission version Neighbourhood Plans are both at an advanced stage of progression towards submission of a planning application.</p>

<sup>3</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/6776/statement\\_of\\_community\\_involvement](https://www.east-northamptonshire.gov.uk/downloads/file/6776/statement_of_community_involvement)

Paragraph/ Policy number in Plan	ENC comments
	<p>Both Cotterstock Road and St Christopher's Drive have been subject to numerous technical studies/ assessments, in readiness for submission of applications in the coming months. By contrast, significant further work would be required before the Neighbourhood Plan sites could be brought forward for development. The site selection process has not considered the likelihood and probability that the Neighbourhood Plan sites could be delivered in the manner envisaged.</p> <p>Furthermore, Land south of Herne Road has not been actively promoted through the Local Plan process.</p> <p>Overall, the issue of achievability/ deliverability has not been considered as part of the site selection process. It is argued that, with the two most deliverable sites discounted, this raises concerns about the site selection process as a whole.</p>
Policy O15	<p><b>Conformity with strategic policies</b></p> <p>The decision to delete the Cotterstock Road site (Land east of Cotterstock Road/ north of St Peter's Road) represents a direct challenge to the adopted strategic policies of the Local Plan. Paragraph 8.18 of the Rural North, Oundle and Thrapston Plan (RNOTP), identified the Cotterstock Road site as being suitable as a longer term site allocation.</p> <p>The Glapthorn Neighbourhood Plan examiner concluded that that draft Neighbourhood Plan was seeking to undermine the RNOTP (adopted strategic policy), so <i>"cannot be found to be in general conformity with the strategic policies of the Development Plan unless a suitable modification is made"</i> (Examiner's Report<sup>4</sup>, paragraph 112). A decision to delete the Cotterstock Road is therefore considered to conflict with strategic policies of the adopted Local Plan.</p>
Policy O15	<p><b>Housing density</b></p> <p>Policy O15 proposes five sites, of greatly varying densities and capacities. The Local Plan (JCS) sets out an overall density standard of 35 dwellings per ha for the sustainable urban extensions (paragraph 10.15). This is the default position and should be applied, at a net developable area of 85% (equating to approximately 30 dwellings per ha) unless development constraints would restrict capacity.</p> <p>This is borne out in the NPPF, which states that housing should be delivered at an appropriate density. The NPPF emphasises that: <i>"it is especially important that planning policies and decisions avoid</i></p>

<sup>4</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/10828/examiners\\_report](https://www.east-northamptonshire.gov.uk/downloads/file/10828/examiners_report)

Paragraph/ Policy number in Plan	ENC comments																																																								
	<p data-bbox="403 210 1342 282"><i>homes being built at low densities, and ensure that developments make optimal use of the potential of each site” (paragraph 123).</i></p> <p data-bbox="403 322 1342 501">The table below provides an assessment of appropriate capacities for the proposed Neighbourhood Plan allocations. If the JCS standard is applied, this would increase the overall capacity of the proposed Neighbourhood Plan site allocations by 111, to 435 dwellings.</p> <table border="1" data-bbox="403 539 1374 1010"> <thead> <tr> <th data-bbox="403 539 632 645">Site name</th> <th data-bbox="632 539 794 645">Oundle Neighbourhood Plan Policy reference</th> <th data-bbox="794 539 927 645">Developable area (ha)</th> <th data-bbox="927 539 1034 645">Proposed allocation</th> <th data-bbox="1034 539 1174 645">Proposed development density</th> <th data-bbox="1174 539 1278 645">Capacity (@85% of 35 dph)</th> <th data-bbox="1278 539 1374 645">Capacity (rounded down)</th> </tr> </thead> <tbody> <tr> <td data-bbox="403 645 632 696">Land south of Herne Road</td> <td data-bbox="632 645 794 696">O18</td> <td data-bbox="794 645 927 696">4.1</td> <td data-bbox="927 645 1034 696">120</td> <td data-bbox="1034 645 1174 696">29</td> <td data-bbox="1174 645 1278 696">122</td> <td data-bbox="1278 645 1374 696">120</td> </tr> <tr> <td data-bbox="403 696 632 748">Millers Road, Benefield Road</td> <td data-bbox="632 696 794 748">O19</td> <td data-bbox="794 696 927 748">0.5</td> <td data-bbox="927 696 1034 748">14</td> <td data-bbox="1034 696 1174 748">28</td> <td data-bbox="1174 696 1278 748">15</td> <td data-bbox="1278 696 1374 748">15</td> </tr> <tr> <td data-bbox="403 748 632 824">Land adjacent to Cemetery, Stoke Doyle Road</td> <td data-bbox="632 748 794 824">O20</td> <td data-bbox="794 748 927 824">2.5</td> <td data-bbox="927 748 1034 824">50</td> <td data-bbox="1034 748 1174 824">20</td> <td data-bbox="1174 748 1278 824">74</td> <td data-bbox="1278 748 1374 824">70</td> </tr> <tr> <td data-bbox="403 824 632 878">Land south of Wakerley Close</td> <td data-bbox="632 824 794 878">O21</td> <td data-bbox="794 824 927 878">1.1</td> <td data-bbox="927 824 1034 878">10</td> <td data-bbox="1034 824 1174 878">9</td> <td data-bbox="1174 824 1278 878">33</td> <td data-bbox="1278 824 1374 878">30</td> </tr> <tr> <td data-bbox="403 878 632 931">Land north of Benefield Road</td> <td data-bbox="632 878 794 931">O22</td> <td data-bbox="794 878 927 931">6.9</td> <td data-bbox="927 878 1034 931">130</td> <td data-bbox="1034 878 1174 931">19</td> <td data-bbox="1174 878 1278 931">205</td> <td data-bbox="1278 878 1374 931">200</td> </tr> <tr> <td data-bbox="403 931 632 963"></td> <td data-bbox="632 931 794 963"><b>TOTAL</b></td> <td data-bbox="794 931 927 963"><b>15.1</b></td> <td data-bbox="927 931 1034 963"><b>324</b></td> <td data-bbox="1034 931 1174 963"><b>21</b></td> <td data-bbox="1174 931 1278 963"><b>449</b></td> <td data-bbox="1278 931 1374 963"><b>435</b></td> </tr> <tr> <td data-bbox="403 963 632 1010"></td> <td data-bbox="632 963 794 1010"></td> <td data-bbox="794 963 927 1010"></td> <td data-bbox="927 963 1034 1010"></td> <td data-bbox="1034 963 1174 1010">[Mean Density]</td> <td data-bbox="1174 963 1278 1010"></td> <td data-bbox="1278 963 1374 1010"></td> </tr> </tbody> </table> <p data-bbox="403 1048 1342 1155">Critically, the proposed housing figures for sites O20-O22 are proposed at significantly lower densities than the Local Plan (JCS) requirement, without any justification.</p>	Site name	Oundle Neighbourhood Plan Policy reference	Developable area (ha)	Proposed allocation	Proposed development density	Capacity (@85% of 35 dph)	Capacity (rounded down)	Land south of Herne Road	O18	4.1	120	29	122	120	Millers Road, Benefield Road	O19	0.5	14	28	15	15	Land adjacent to Cemetery, Stoke Doyle Road	O20	2.5	50	20	74	70	Land south of Wakerley Close	O21	1.1	10	9	33	30	Land north of Benefield Road	O22	6.9	130	19	205	200		<b>TOTAL</b>	<b>15.1</b>	<b>324</b>	<b>21</b>	<b>449</b>	<b>435</b>					[Mean Density]		
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Policy O18	<p data-bbox="403 1196 810 1227"><b>Land South of Herne Road</b></p> <p data-bbox="403 1234 1374 1305">Policy text formatting needs correcting – should use sub-numbering/ lettering, for clarity; e.g. O18(a) or O18(1) etc.</p> <p data-bbox="403 1346 1374 1816">The submission version Neighbourhood Plan proposes the replacement of the St Christopher’s Drive and Cotterstock Road sites from the Regulation 14 version of the Plan by an increased quantum of development (from 45 to 120 dwellings) at land south of Herne Road. The SA report (Table 10) justified deletion of these sites predominantly due to highways/ access issues. This raises similar concerns regarding the implications of an increased quantum of development (75 dwellings) off Herne Road (single access point). It is not evidenced how the St Christopher’s Drive site would be unacceptable on highways grounds if an equivalent single larger-scale development, with a single point of access, is appropriate on an alternative site to the south (at the opposite side of Prince William School).</p> <p data-bbox="403 1856 1374 1998">Some concerns are also raised about the achievability of land south of Herne Road. This scheme is significant for the delivery of the Neighbourhood Plan as a whole, as land south of Herne Road is one of the two main proposed site allocations (&gt;100 dwellings). As</p>																																																								

Paragraph/ Policy number in Plan	ENC comments
	at submission (May 2019), no evidence had been provided as to the site's deliverability, although we note that a pre-application enquiry was received in July 2019.
Policy O19	<p><b>Millers Field, Benefield Road</b> Land south of Benefield Road (known as "Millers Field") is considered to be an appropriate proposal, at an appropriate density. It is appropriate to allocate this for 15 dwellings through the Neighbourhood Plan, which will ensure that the site could be explicitly recognised as forming part of the housing land supply.</p> <p>It is noted that Policy O5 makes reference to "Allotments and Wildlife Area at Miller's Field". For consistency, reference to this should also be made within Policy O19.</p>
Policy O20	<p><b>Land adjacent to the Cemetery, Stoke Doyle Road</b> Site O20 would bring forward part of the potential longer term site allocation proposed in the current Local Plan (RNOTP paragraph 8.18). The site also broadly corresponds to that shown in the 1<sup>st</sup> draft Local Plan Part 2 (November 2018).</p> <p>Nevertheless, the proposed site does not include the area of land to the west of Warren Bridge (in separate ownership). It is advised that the site allocation should be extended to the east to incorporate this land, and the capacity increased accordingly (from 50 to 70 dwellings).</p> <p>It should be noted that the capacity of the site may be limited by highways constraints relating to Warren Bridge on Stoke Doyle Road.</p> <p>Policy text formatting needs correcting – should use sub-numbering/lettering, for clarity; e.g. O20(a) or O20(1) etc</p>
Policy O21	<p><b>Land south of Wakerley Close</b> Site O20 is recognised as being developable, although no evidence has been presented as to whether there is a development partner to secure implementation of the site. However, the capacity and density (&gt;10 dwellings per ha) is inappropriate. The site should be allocated for at least 30 dwellings to meet the minimum density requirements.</p> <p>Policy text formatting needs correcting – should use sub-numbering/lettering, for clarity; e.g. O21(a) or O21(1) etc</p>
Policy O22	<p><b>Land north of Benefield Road</b> The Biggin and Benefield Estate land, to the north of Benefield Road, provides for up to 19ha of potential development land to the east of Biggin Grange.</p>

Paragraph/ Policy number in Plan	ENC comments
	<p>The Neighbourhood Plan proposes a mixed use development, releasing part of the land for residential development, with further land set aside for a festival field (draft Policy O10). The 1<sup>st</sup> draft Neighbourhood Plan proposed residential development immediately to the north of Benefield Road/ Wakerley Close, with a festival field to the rear (north). This has been amended in the submission Plan, proposing a long access road to the festival field, with housing to the north (rear). The NPPF requires that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses (paragraph 117). This includes achieving appropriate densities and well designed layouts.</p> <p>The proposed residential development would be detached from the main urban area, given that there is little opportunity to access the Creed Road residential area to the north. If the Neighbourhood Plan seeks to allocate this site, then the proposed development framework in the 1<sup>st</sup> draft version should be reinstated.</p> <p>Notwithstanding, the proposed development capacity is inappropriate. The proposed development area (approximately 7ha) should accommodate around 200 dwellings.</p> <p>Policy text formatting needs correcting – should use sub-numbering/ lettering, for clarity; e.g. O22(a) or O22(1) etc</p>

9 July 2019

Michael Burton

Principal Planning Policy Officer

East Northamptonshire Council