

Oundle
Neighbourhood Plan 2011 - 2031
Regulation 14 Consultation Draft



May 2018

CONTENTS

1	Introduction	2
1.1	Context	2
2	Legal and Policy Context	3
2.1	Legal Requirements.....	3
2.2	National Planning Policy Framework, & Planning Practice Guidance	3
2.3	Adopted Development Plan.....	5
2.4	Sustainability Appraisal/Strategic Environmental Assessment.....	5
3	Oundle Neighbourhood Plan	7
3.1	Vision, Aim and Objectives.....	7
3.2	Neighbourhood Plan Policies.....	7
4	Conclusions	10

APPENDICES

Appendix 1 Land East of Cotterstock Road, Oundle

1 INTRODUCTION

1.1 Context

- 1.1.1 These representations provide the response of Gladman Developments Limited (hereafter referred to as “Gladman”) to the Oundle Neighbourhood Plan Regulation 14 Consultation Draft, which has been published by Oundle Town Council for consultation from Monday 9th April until Monday 21st May 2018.
- 1.1.2 Gladman welcomes the opportunity to comment on the Oundle Neighbourhood Plan (ONP). Through this response, we will explore the relationship of the proposed neighbourhood plan to relevant national and local policy requirements. Where relevant, we will highlight areas of support, as well as elements that we feel may require refinement as the Plan is further developed.
- 1.1.3 Gladman has an interest in Land East of Cotterstock Road and would welcome the opportunity to discuss the site with the Town Council in due course.

2 LEGAL AND POLICY CONTEXT

2.1 Legal Requirements

2.1.1 Neighbourhood Plans must be prepared against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that a neighbourhood plan must meet are as follows:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders. Read more details.
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

2.1.2 The Neighbourhood Plan have regard to these basic conditions throughout the preparation process. It will be especially important for the version of the Plan that is prepared for submission to East Northamptonshire District Council under Regulation 16 to take full account of these basic conditions and it must be accompanied by a 'Basic Conditions Statement' to demonstrate that it meets these requirements.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how they are expected to be applied. In doing so it sets out the requirements for neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet identified development needs.

- 2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet Objectively Assessed Needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.
- 2.2.3 The application of the presumption in favour of sustainable development has implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.
- 2.2.4 Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood Plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Planning Practice Guidance

- 2.2.5 The Planning Practice Guidance (PPG) provides further details on how specific elements of the Framework should be interpreted when preparing Local and Neighbourhood Plans. The neighbourhood planning chapter in particular provides a clear indication of how the Government expects qualifying bodies to take account the requirements of the Framework when preparing a neighbourhood plan.
- 2.2.6 On 11th February 2016, the Secretary of State published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these updates highlighted a number of component parts of the evidence base that are required to support an emerging neighbourhood plan, in particular, the importance of considering housing reserve sites and providing indicative delivery time tables to ensure that emerging evidence of housing needs is addressed in order to help minimise any potential conflicts that can arise so that these are not overridden by a new Local Plan. In this circumstance, we refer to the emerging East Northamptonshire District Local Plan Part 2.
- 2.2.7 The PPG makes clear that up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development¹. Furthermore, the PPG indicates that all settlements can play a role in delivering sustainable development in rural areas, and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be

¹ PPG Paragraph: 009 Reference ID: 41-009-20160211

avoided unless this can be supported by robust evidence². Where a need for market and/or affordable housing is identified, the neighbourhood plan should seek to deliver this need in full with sufficient flexibility to respond to rapid change, otherwise there is risk that the Plan will be found contrary to basic conditions (a) and (d).

2.3 Adopted Development Plan

2.3.1 The adopted Development Plan for East Northamptonshire includes the North Northamptonshire Joint Core Strategy (NNJCS), which was adopted in July 2016. The NNJCS contains an overarching strategic plan for an area that includes the administrative areas of East Northamptonshire District Council, Corby Borough Council, Kettering Borough Council and the Borough of Wellingborough. Each of the individual local planning authorities will be responsible for preparing a Part 2 Local Plan. It is anticipated that East Northamptonshire District Council will publish a 'District Wide Part 2 Local Plan' to complement the NNJCS, however to date this has not yet progressed to the pre-submission consultation stage. The Rural North, Oundle and Thrapston Plan (July 2011) continues to form part of the adopted development plan for East Northamptonshire District and will therefore also need to be taken into account through the production of the Oundle Neighbourhood Plan.

2.3.2 The NNJCS identifies a network of urban and rural areas and directs development towards the Growth Towns and Market Towns. In relation to Market Towns, such as Oundle, the NNJCS also emphasises the need to provide a strong service role for the local community and that of those of the wider rural hinterland. This role should therefore be positively reflected through the objectives and policies of the ONP.

2.3.3 It is also important to note that the adopted NNJCS includes a provision that in order to maintain a rolling supply of deliverable sites to provide 5 years' worth of housing (plus relevant buffer), the Council will identify developable sites or broad locations of growth for the rest of the plan period. Furthermore, the NNJCS sets out a mechanism to trigger corrective action to boost housing supply should it be required at any time during the plan period³. The ONP will therefore need to reflect this position and should not contain provisions that would unnecessarily preclude the delivery of further sustainable development opportunities should they be required to meet housing needs over the plan period.

2.4 Sustainability Appraisal/Strategic Environmental Assessment

2.4.1 The preparation of neighbourhood plans falls under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.

² PPG Paragraph: 001 Reference ID: 50-001-20160519

³ Para 9.6 and Policy 29, North Northamptonshire Joint Core Strategy, July 2016.