



Our ref: 35318

21 May 2018

**Attn: The Secretary  
Neighbourhood Plan Steering Group**

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Dear Sir or Madam,

**REGULATION 14 CONSULTATION ON THE DRAFT OUNDLE NEIGHBOURHOOD PLAN (ONP):  
REPRESENTATIONS IN RELATION TO LAND FRONTING COTTERSTOCK ROAD, OUNDLE.**

We write to provide our representations in relation to the above site ('the site') owned by Northamptonshire County Council (NCC). These comments also follow our meetings with the Steering Group and other interested parties in February and April 2018, where we discussed the site and agreed to set out our views in written representations to the draft ONP.

It should also be noted that we also made previous representations to ENDC in relation to this site as part of the Regulation 18 consultation on the ENDC Local Plan Part 2 in March 2017 and updated by email dated 21 May 2017, copy attached.

**The Site**

The site, denoted in blue on the enclosed OS drawing, is some 0.35 hectares in area and sits on the northern edge of Oundle, currently forming part of the playing fields associated with Oundle CE Primary School.

**Proposed development of the site**

Before we comment on the contents of the Neighbourhood Plan, we would like to set out NCC's current proposals for the re-development of the site, as shown on the drawings attached.

The drawings show a proposal for five detached dwellings on the site, served by a new 'private drive' access directly from Cotterstock Road. In preparing these drawings we have had regard to:

- The well-established need and demand for additional housing in Oundle and the district as a whole;
- The suitability of the site for such development, in the light of its location with immediate access to the adjoining school and easy access by bus, cycle or on foot to the comprehensive medical, shopping and community facilities along Glapthorn Road and within the town centre;
- The relationship between the site and its surroundings along Cotterstock Road, which are characterised by larger, detached dwellings in good sized plots with individual accesses from Cotterstock Road;
- The policies in the adopted Development Plan and the emerging draft Neighbourhood Plan (including the Oundle Town Design Statement 2018), together with the emerging Part 2 Local Plan and its evidence base;
- The proposed allocation of land directly opposite the site for 30 dwellings in the emerging Neighbourhood Plan; and
- Informal discussions held with Members of Oundle Town Council, the Neighbourhood Plan Group and ENC/NCC officers and Members during February – April 2018.



NCC aims to bring the site forward in consultation with the Neighbourhood Planning Group and East Northamptonshire DC (ENDC). These proposals are currently being fully developed and therefore it is important that a supportive policy framework is put in place to provide certainty to all parties involved.

### **Detailed Comments on the Regulation 14 draft Oundle Neighbourhood Plan**

The Neighbourhood Planning (General) Regulations 2012, Part 5, Neighbourhood Development Plans, specify the requirements for a Regulation 14 consultation. In this context we seek clarification of whether the Plan, as presented on the Town Council's website, conforms with the above Regulations, for the following reasons:

1. it does not appear to be accompanied by a suitable policies map, nor a statement "*explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.*"
2. its evidence base, in the form of various Background Papers appears incomplete (eg. many of the Papers have several sections, including the Green Space Paper) and is not up-to-date, having been prepared in 2014 or earlier; and
3. no SEA or SA Screening Request appears to have been made to ENDC.

We also have the following objections to the draft Plan.

4. It appears to identify the Cotterstock Road site as part of an Important Open Space under policy O.3. However, this is contrary to the terms of paragraph 74 of the NPPF in that:
  - a) it contradicts the ENDC 2017 Open Spaces Study, which shows that this small part of the Oundle CE Primary School playing field is not required to meet the open space needs of Oundle;
  - b) there is no ONP Background Paper describing the role that the site plays as Important Open Space;
  - c) the land outlined in red on the attached OS plan is mainly playing field for the Primary School and is to be retained for sport and recreation use by the school and by the community outside school hours. This land is approximately 3 hectares in area (excluding the school buildings and access road/car parking areas) and is significantly larger than required for a primary school under Department for Education guidance; and
  - d) the site outlined in blue is therefore surplus to requirements for sport/recreation, it is also privately owned and not accessible to the public.
5. The Cotterstock Road site was put forward by NCC to the Neighbourhood Plan Group as a suitable housing allocation site in 2015 but it does not appear to have been assessed as a potential housing site as part of the ONP process.

**In the light of the above objections and for the reasons given elsewhere in this statement, the site should be allocated under policy O.16 of the Plan for residential development of 5 dwellings. The site should also be included within the settlement boundary and shown as such on a suitable Policies Map.**

This will help to meet local housing needs on a sustainable and deliverable site and provide reassurance that the nature of the development will be sympathetic to the character of this part of Oundle. Furthermore, it will also help to ensure that the ONP meets the required basic conditions at



Examination in being consistent with Policies 29 and 30 of the North Northamptonshire Joint Core Strategy (JCS).

We trust the above representations are helpful in taking the draft ONP forward. We look forward to an ongoing dialogue with the Neighbourhood Plan Group and officers at ENC in respect of the progression of the Plan. Should you wish for clarification or further meetings to discuss any of the above, please do get in touch.

Yours faithfully

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[Redacted]  
[Redacted]  
For and on behalf of  
**PETER BRETT ASSOCIATES LLP**

cc: [Redacted]  
[Redacted] Senior Planning Policy and Conservation Manager, East Northamptonshire Council

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