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## **Reg 14 Comments**

### **SITE 23**

#### **Land East of Cotterstock Road (Site 23)**

Site 23 has been identified in the Oundle Neighbourhood Plan ('the Plan') as a suitable area for development for Oundle. This site is not suitable for development and should not be included in the Plan for the following reasons.

#### **Topography**

The land is currently used for agricultural purposes and slopes down towards the river. The gradient is only just (approx. 5%) within the recommended gradient for pedestrians to ensure inclusive mobility. The gradient of this area is such that in the winter the roads and pavements from Cotterstock Road down to St Peters Road are covered in black ice and very dangerous to travel on. There is nothing to suggest that this site would be any different.

#### **Geology and Flood Risk**

The land itself consists of limestone, has a high water table and is full of natural springs. It is my understanding that on many occasions it has been stated (and documented) that this land should not be built on because of its makeup and the risk to flooding. About 20 years ago Anglian Water commissioned a report that concluded that this land should never be built on because of the spring waters in the field. Several properties on St Peters Road have had significant problems with their foundations as a result of similar springs in that area. A neighbour is already experiencing loss of electricity on a couple of occasions because of flooding caused by springs at the front of the house, on Cotterstock Road.

The springs in the ground flow down to Snipe Meadows and the River Nene at the bottom of the hill. Development at this site would affect the route this water takes. It may reduce the overall flow into the meadows and the river which would have a knock on effect to the flora, fauna and biodiversity that rely on the water both in the immediate vicinity and further down river. It may increase the flow into the river (increased run off due to hardened landscaping such as tarmac and disturbing the underground flow) thus extending the flood plain area and risking flooding to the properties at the bottom of the hill. Suburban communities on hillsides are notorious sources of pluvial flooding. In the UK, pluvial flooding represents 1/3 of all flood risks. It is a regular issue due to the high rate of developments creating large impermeable surfaces. The area at the bottom already has a medium/high risk of significant flooding which already occurs every year.

Residents at the top of the hill already experience significant water retention in their gardens even before there is heavy rain. Recent development on Hillfield Road resulted in properties on Glapthorn Road being flooded. Unfortunately it seems that no matter how many studies are undertaken it is impossible to predict exactly where and when water will appear. Flooding from groundwater can stay for 2-3 weeks and sometimes longer causing significant damage to property and distress to residents.

The EU Water Framework Directive recognises the significant pressures placed on the water environment and that it is affected by every activity that takes place on the land. One of the objectives of the WFD is to prevent deterioration of the status of surface water and ground water.

The Anglian River Basin District Flood Risk Management Plan 2015-2021 (March 2016) identifies the Nene as a 'management catchment' area which is an area where management is focussed to enable a 'catchment based approach' to water management. The objectives for catchment based approach is to (1) deliver positive and sustained outcomes for water environment by promoting a better understanding of environment at local level; and (2) to encourage local collaboration and more transparent decision making when both planning and delivering activities to improve water environment.

The Groundwater Flood Risk Study for Northants identifies Nene Valley as a Ward where priority is recommended to develop a high level strategy for mitigating against groundwater flooding and informing future development scenarios. One mitigation option is avoidance of development in areas where there is a risk.

Local government must consider the impact on hydromorphology when preparing spatial plans, local flood risk management plans, and decisions on development management, new buildings and infrastructure. Again, the Plan states that it is seeking 'a safe and distinctive environment to enable flood risk reduction'. Development of this site does not do this and is likely to increase the risk as a result of disturbing and altering the underground springs.

### **Coalescence**

The Plan states, "Development within the open countryside beyond the town is to be carefully managed to safeguard the character and beauty of the countryside and ensure that development does not result in coalescence between settlements." Site 23 borders Glapthorn Parish boundary. Development here will open the gates to eventual coalescence. It has been excluded from previous town plans because the field is partly in Oundle and partly in Glapthorn parish and to include it would leave the town open to development across the entire field with even more houses than was

wanted and with those in the Glapthorn part beyond Oundle's control. Nothing has changed and therefore the site should be removed again.

This area of Oundle is already subject to high density development. The growth of the town should extend Oundle in other directions. The borders with other parishes are further away so reducing the risk of coalescence. Previous Town Council policy was to seek development in areas that did not border other parish boundaries as coalescence is seen as a real risk.

### **Habitats and Biodiversity – protecting and enhancing the environment**

It is a greenfield site currently used for farming. The field is bounded by tall mature hedgerows and trees which are home to a wide variety of birds and wildlife.

Snipe Meadow, a Local Wildlife Site, is land proposed to be designated as Local Green Space. Part of its appeal is its location in open countryside, on both sides, with views. Development on site 23 would have a detrimental impact on this.

The area also provides a wildlife habitat which is constantly being squeezed as urban areas increase; some of these move freely between the field and the properties that border it as the garden borders are for the most part hedgerow. Amongst other wildlife, the site is home to a migrating cuckoo from the months of April/ May to July/ August; this bird returns to this site every year. Cuckoo's are on the RSPB's red list which is the highest conservation priority, with species needing urgent action. In fact, the Upper Nene Valley Gravel Pits SSSI, Repeat Breeding Bird Survey 2013 showed a 38.4% decline in the number of breeding pairs of cuckoo. This figure is higher than the 33% decline in the UK overall.

One of the vision statements to the Plan is 'a safe and distinctive environment to contribute to wildlife conservation'. Allowing development on this land will absolutely contravene this statement. Development on this site will destroy the habitat and therefore it should be excluded from the Plan.

The Plan states there is a commitment to protecting green spaces which includes amongst others visual amenity, tranquillity or richness of wildlife. Site 23 satisfies all these criteria and again should be excluded from the Plan.

### **Improving accessibility and connectivity**

The entrance to this proposed site is from the Cotterstock Road. The entrance is on a bend and very near to the entrance to the primary school. This area is already heavily congested from school traffic with dangerous driving and parking in evidence. The road from Cotterstock to Oundle is a rural road with one single lane each side. It is subject to the national speed limit (60mph) and as it bends towards Oundle the speed limit drops to 30mph and then almost immediately on the right is the school entrance.

Local residents and school traffic are already exposed to drivers who do not slow down to 30mph on entering Oundle. To add an entrance to a minor road at that point is positively dangerous, particularly as it would be unexpected. Drivers exiting that minor road would be at risk of being hit by someone coming round the corner with limited visibility and certainly not within the recommended safe stopping distance. Increasing the splay to increase visibility would create a large radius which reduces pedestrian safety. A detour is required to the pedestrian desire line to minimise crossing distance, vehicles turn in faster and pedestrians cannot normally establish priority against fast turning vehicles. In addition when planning for pedestrians and cyclists it is better to keep these routes as near to level as possible along their length and width. This site does not do this as it is on a significant hill.

“... plan objectives of keeping the town compact and walkable with built development no more than a mile from the town centre.” Development at this site would be over a mile from Oundle town centre. This would exceed the plans stated requirements that development should be within one mile of the town to encourage walking and less reliance on car use.

Development at this site would also encourage the use of cars. It is a significant distance to the nearest bus stop which would discourage residents from using public transport.

If it was determined that this site should be developed a safer entrance point would be at the bottom of the site which would also provide residents with a shorter walk to the town centre and public transport.

### **Meeting Housing Requirements**

Oundle needs a further 203 dwellings to satisfy Policy 29 of the Joint Core Strategy. The removal of site 23 would still enable development to satisfy this quota. 65% of local residents indicated they did not wish to see development on the edge of Oundle. Developing at this site would make what is a highly developed area of the town even more so, where there are no amenities or employment other than the primary school. Unless you are a teacher or have related skills, there are limited employment opportunities within easy access. The school facilities are not available to children outside of school hours unless it is in an organised activity. The nearest public park is the pocket park on New Road. The topography of the land prevents a suitable playing area for anything other than very small children.

### **S106 funds/ Community Infrastructure Levy (CIL)**

Whilst there is mention of receiving funds in return for developments there is inevitably a lag between the development and payment of these funds. It is not unknown for developers to use legal loopholes to circumvent these payments. Additionally, there is no guarantee that Oundle will receive 100% of any funds paid.

## Oundle Town Design Statement

### Comments to Design Principles

#### 1. Design Principle 1 : Views and open spaces

This site offers long distance views cross the Nene valley. As the town has developed, such views from within the town are disappearing. It links the town to countryside by allowing panoramic views of the countryside beyond.

The plan already recognises the importance of the view for this side of town – “Due to the landscape sloping south towards the river Nene the town enjoys views of the countryside

beyond. This is considered an important advantage of the town and these important long

distance views must be preserved because they provide:

- A rural town feel;
- An awareness of the countryside beyond;
- A welcome contrast with the tight urban form and hard surfaces within the town;
- Provides greater separation from the road;
- A feeling of well-being and a sense of space

It further states “Public views and access to views of river frontage should be preserved”.

This view can be appreciated coming from Cotterstock into Oundle across the valley towards Ashton Wold and creates a sense of space and relief from the tight urban form and hard spaces.

As a consequence of the relatively prominent location of the land when viewed from the east, and its position on the northern edge of Oundle, it should be excluded as it is unable to satisfy the design principles set out in the Plan.

The development of the boardwalk in Snipe Meadow, will increase use of the footpath along the river. Development of this site would bring the edge of the town down to the river and remove the feel of spaciousness. The view back up the hill would not be into countryside but into a housing development. The area around Snipe Meadow is already recognised as important as stated in the Appendix to the Design Statement, Zone 5. In Zone 5 reference is made to the lovely view from the top of St Peters Road as a stunning long distance view

from a characteristic high point in the town. This is true from all the high points in this area.

It adds an additional green lung to reduce the impact of pollution from increased traffic. This is important as the level of traffic increases along the A605 towards Peterborough as a result of other development in the area and lack of employment opportunities in Oundle and neighbouring towns.

## **2. Design Principle 2 : Architecture and Design**

The plan states that “Development should safeguard and improve the quality of the environment within and adjacent to it, sitting comfortably with its neighbourhood and enhancing the location by taking into account:

- The lie of the land, blending unobtrusively into the landscape and townscape;”

Building on this site would not blend unobtrusively into the landscape. It will be clearly seen from the A605 and destroy a long distance view into the town.

## **3. Design Principle 4 : Sustainability**

They aim to reduce the use of cars within the town. This site is more than the 400m distance to relevant public transport service, being the preferred distance set out in the Manual of Streets (2007). This will not support the use of cycling or walking particularly as the proposed exit from the site is onto the Cotterstock Road which is uphill.

Given the current issues with the bridge on the north side of town and the proposed weight restrictions, public transport is already under threat within the town.

## **4. Design Principle 6 : Employment**

There are limited employment opportunities with the town. It has been stated that the largest employer is now (after the restructure of Fairline) Oundle School at 700. A resident who is not a teacher or associated with education will for the most part have to look outside of Oundle for employment which will require the use of the car. As is already stated there is very little employment within Zone 5, the largest of which is the Primary School. So again, if a resident within this zone is not linked to education, they are not going to find employment on their doorstep thus creating a further need for a car.

Permitting development on this site would go against the Plan’s own stated design principles.

### **Policy O.25 Land East of Cotterstock Road**

The following should be included within this:

- Take full account of flood risk and on-site drainage issues

- Flood or water storage areas as the site proposal is for more than 15 dwellings

I suggest that the field adjacent to Cotterstock Road and St Peters Road should be removed from the development plan for following reasons:

a. The site is not needed for development since Oundle is already meeting its house targets. Moreover, it is highly productive agricultural land and is positioned immediately adjacent to the parish boundary. b. The access site on a bend along Cotterstock road is extremely unsafe, both for the large number of young and old people and for the vehicles that use the road. I request that a survey is done of the road safely implications of the proposed development before any further consideration of the site is entertained. c. The Transition Oundle group have also stated they feel a footpath is of 'low benefit' as an amenity offered by the developers. I agree, and suggest that this is not only a grossly inadequate contribution by potential developers to Oundle but also shows clearly the total indifference of the developers to the town itself. d. Oundle already suffers from flooding, the area has several natural springs and, with an existing high water table, this development will increase all the drainage problems and flooding that already exist. e. I suggest for all these reasons the field behind Cotterstock and St Peters Road be removed from the Oundle Town Plan.

In addition to the points made in my email of 3 February below, I consider this site to be unsuitable for development for the following reasons

1. adjacent to the parish boundary
2. building on prime agricultural land
3. the developers are only offering a foot path as an amenity to the town, this is not a good enough contribution from the development. I understand from my daughter that Transition Oundle have also stated they feel a footpath is a 'low benefit' as an amenity offered by the developers (<https://transitionoundle.org.uk/images/np/to-comments-oundle-np-march2018-version.pdf>) and suggest that this site is removed from the plan.

You stated the consultation was a listening exercise, however at the most recent meeting she attended it felt like the proposals were a 'done deal'. I sincerely hope this is not the case and that the feedback from neighbouring residents of this site, overwhelmingly requesting you to remove it from the plan, will be acknowledged.

I do not think that this is a good choice of development site because it is:

1. the water table is high and there are several natural springs in the area and this will exacerbate all the drainage problems and flooding that occurs with the existing houses in the times of rain.
3. The building will be on prime agricultural land
4. adjacent to the parish boundary
5. The site is not needed as if it is removed from the plan Oundle still is providing a

sufficient number of houses.

6. The field site access on a bend along Cotterstock road is very dangerous and with a high volume of young and old people as pedestrians I have serious concerns about safety and potential casualties and road traffic accidents.

I request that the field site behind Cotterstock and St Peters Road is removed from the Oundle Town Plan.

I suggest that the field adjacent to Cotterstock Road and St Peters Road should be removed from the development plan for following reasons:

1. The site is not needed for development since Oundle is already meeting its house targets. Moreover, it is highly productive agricultural land and is positioned immediately adjacent to the parish boundary

2. The access site on a bend along Cotterstock road is extremely unsafe, both for the large number of young and old people and for the vehicles that use the road. I request that a survey is done of the road safely implications of the proposed development before any further consideration of the site is entertained.

3. The Transition Oundle group have also stated they feel a footpath is of 'low benefit' as an amenity offered by the developers. I agree, and suggest that this is not only a grossly inadequate contribution by potential developers to Oundle but also shows clearly the total indifference of the developers to the town itself.

4. Oundle already suffers from flooding, the area has several natural springs and, with an existing high water table, this development will increase all the drainage problems and flooding that already exist.

5. I suggest that for all these reasons the field behind Cotterstock and St Peters Road be removed from the Oundle Town Plan.

Thank you for considering my reasons for objecting to the development of the field behind Cotterstock Road and St Peters Road and my request for its removal from the Oundle Town Plan.

The land at the end of Herne Road currently provides a peaceful place for residents to walk in a fairly natural environment with significant amounts of wildlife and wild flowers. These seem to be well viewed by walkers- shame to lose.

Why another 2 cricket pitches? Couple of issues here - is that the in demand sport in Oundle? Concerns over the need for the pavilion to be visible and operate long hours with significant increases to health throughout the day and night?

Concerned about the Pavilion part of the proposed development at the top of herne road. In as much as much that it could be a semi commercial venture, with w/e

evenings use as social club or for hire facility. Thereby increasing traffic at a time which is now very quiet. Also why 2 more cricket pitches in the town? Why not tennis courts for example?

There is already a lot of congestion on Herne road and at peak times related to the school arrival and drop off. How will additional development inc sport facilities impact?