

Raunds Neighbourhood Plan 2011-2031

Questions from the Independent Examiner

Prepared by

JOHN SLATER BA(Hons), DMS, MRTPI

John Slater Planning Ltd

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Answers prepared by officers of Raunds Town Council and East Northamptonshire Council

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Introduction

1. As you will be aware I have been appointed to carry out the examination of the Raunds Neighbourhood Plan. I have carried out my initial review of the Plan and the accompanying documents and am about to start drafting my report. I also carried out a visit to the area on 13th July 2017.
2. My view is that I should be able to deal with the examination of this Plan by the consideration of the written material alone but I do reserve the right to call for a public hearing, if I consider that it will assist my examination. There are a number of questions that I have arisen before I start writing my examination report upon which I would appreciate the comments from both the Qualifying Body (QB) and the Local Planning Authority (LPA).

Questions

3. How is the Employment Site 2 to be accessed and if it is from the A45 has the highway authority accepted the principle of a new access?

A [Raunds Town Council]: The site is subject to an extant permission for use (Classes B1, B2 and B8) application ref 11/01747/OUT. A new application 17/00266/FUL is currently under consultation. Both applications show the access being through the residential development "Border Park" off Brick Kiln Road. There is no direct access to the A45.

Questions 4, 5 and 6 relate to mapping errors.

4. There is a discrepancy between the Local Green Space shown on Figure 5 for Site 9 Brick Kiln Road allotments. On the submission document, it shows just the allotment site, but on the plan attached to the Erratum Notice it shows the whole area between the two arms of the residential development now underway. I assume that the Submission Plan is the correct one as the text identifies the allotments only. Will the QB please clarify?

A [Raunds Town Council]: Figure 5 is correct.

5. The employment area at Enterprise Road appears to have extended to the east on the Erratum notice compared to the Submission Document. Furthermore, on my site visit I noticed that the designation covers a row of residential properties at the front of the site. Is it the intention that they be included in the area to be protected by Policy R13?

A [Raunds Town Council]: Policy R13 seeks to protect the current employment area only. The residential properties at the front of the site are not to be included.

6. There are two employment sites shown on the Erratum Notice on Grove Street, close to its junction with Thorpe Street and Brook Street. On site, there appeared no evidence of employment activity but I saw the open space at the front of the site. Was it zoned on the Erratum Plan in error?

A [Raunds Town Council]: Yes: The site you refer to is known locally as "The Rowans". The original plans for the site included small employment units. However plans were revised and approved by the LPA during the build and the site is now purely residential.

7. Do the QB and the LPA have any views of the Regulation 16 representation made on behalf of Rayner Estates that a residential development is required to fund an extension to Manor School. I would ask the LPA whether there have been any financial contributions requested or received from housebuilders to deal with additional school places arising from the new residential developments taking place in the town. Does the LPA have a CIL Scheme in place and can contributions be made to fund extra school spaces as part of the town's infrastructure?

A [Raunds Town Council]: As the QB the Town Council has recorded their response in the consultation log. Please see page 25 of the [consultation log](#).

The Raunds Neighbourhood Plan has intentionally not allocated any additional housing sites para 4.9 refers.

Housing 4.9

There have been planning permissions for 1,058 dwellings approved within Raunds in recent years. The emerging North Northamptonshire Core Strategy identifies a housing requirement for Raunds of 1,060 dwellings over the period 2011-2031. On this basis there is no need for the Raunds Neighbourhood Development Plan to identify additional land for housing. This option was considered by the Steering Group but discarded as being unnecessary.

The Town Council as QB would however be happy to consider alternative community uses for the site.

The LPA will no doubt give the examiner the most up to date information but the Town Council understands that the following contributions have been agreed for Education and training:

Darsdale EN/07/02238 (off Chelveston Road): Maximum of £511,000 towards secondary and sixth form education.

West End EN/11/01747/OUT and EN11/01748/OUT (Border Park): Maximum of £221,000 towards secondary and sixth form education.

RPC Site EN/10/1753/OUT (The Rowans): Maximum of £64,000 towards education.

Northdale End EN/09/01626/OUT: Maximum of £335,967 towards education

The LPA does not have a CIL scheme in place.

8. Does the LPA have a view as to whether the designation on the land on the south side of Meadow Lane is “extensive”, which would be one of the considerations if it were to be considered for Local Green Space designation rather than just as protected open space? Does the LPA consider that this agricultural land, which appears to be actively farmed, should be treated as open space?

A [Raunds Town Council]: This question is for the LPA to answer, however the LPA did not offer a view on whether or not the land on the south side of Meadow Lane was “extensive” in their [response](#) to the Regulation 14 consultation.

A [East Northamptonshire Council]:

Context

Much of the land to the south of Meadow Lane (the western part of the site) was recently the subject of a planning application for: “Development of two distribution buildings containing B8 warehousing space with ancillary office, B1 office and research and development space (B1c)”, (reference [16/02119/FUL](#)). This application was validated on 2nd November 2016 and approved by the Planning Management Committee on [29th March 2017](#), subject to completion of a S106 Agreement.

Planning permission was subsequently granted on 8th May 2017. This permission is now subject to judicial review. Notwithstanding the outcome of the judicial review, it is understood that the Raunds Neighbourhood Plan will be examined on the basis of the submission version Plan; submitted on 11th November 2016.

East Northamptonshire Council has responded to the details of question 8 in two parts; set out below

- a) *Does the LPA have a view as to whether the designation on the land on the south side of Meadow Lane is “extensive”, which would be one of the considerations if it were to be considered for Local Green Space designation rather than just as protected open space?*

A: It is noted that the submission Neighbourhood Plan contains two categories of “protected open space”, with an enhanced Local Green Space designation applied in the case of five sites within the urban area (Policy R7). The Plan also contains a further “protected open space” category (Policy R6), which includes Land at Meadow Lane (site 25).

This site, which covers over 50ha, is vastly larger than all of the other proposed Policy R6 sites. Indeed, this site is significantly larger than all of the other “Policy R6” sites, combined. It must therefore be emphasised that the 50ha area in question could not be regarded as anything other than an extensive tract of land; compared to around 330ha for the whole of the Raunds built up area.

- b) *Does the LPA consider that this agricultural land, which appears to be actively farmed, should be treated as open space?*

A: In considering the appropriateness of the Meadow Lane site as protected open space, it is important to consider how Policy R6 of the Neighbourhood Plan and the relevant Local Plan policy (Joint Core Strategy Policy 7) should be applied in determining proposals for development of the site. Policy R6 contains criteria stating that: ‘Development of such spaces will only be permitted when:

- **equivalent or better provision is made in a suitably accessible location; or**
- **the space is no longer required or suitable for use as an open space.’**

These Policy R6 criteria directly link to Policy 7(d) within the current Local Plan Part 1 (Joint Core Strategy), relating to the protection of community services and facilities. The land south of Meadow Lane is used wholly for agriculture, with no public access other around the perimeter of the site by way of Public Rights of Way (PROWs). In any event, PROWs would need to be retained or respected as part of any possible future development schemes for the land in question.

All of the other Policy R6 sites are public or recreational open space; consisting of public open spaces, playing pitches or amenity green spaces. By contrast, land south of Meadow Lane is exclusively agricultural. Therefore, this site is not considered to fulfil the requirements of Policy R6, which clearly seeks the protection of public and recreational open space in and around the town. It cannot be argued that the land south of Meadow Lane has any function as public or recreational open space.

Concluding Comments

9. It would be helpful if I could have responses to these questions within the next 14 days to allow me to conclude my examination report expeditiously. It may be in some case a joint response to a question would be sensible, but in other cases an individual response may be required from the two parties. I will leave it to you both to determine how best to respond.

10. I would be grateful if this note and the subsequent responses could be placed on East Northamptonshire District Council's and the Neighbourhood Plan's respective websites.

John Slater BA(Hons), DMS, MRTPI

Independent Examiner

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