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Planning Policy and Conservation
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Dear Sirs

Glaphorn Neighbourhood Plan 2016-2031 - Regulation 16 consultation

Thank you for the opportunity to make representations on the Regulation 16 Consultation version of the Glaphorn Neighbourhood Plan ("the Glaphorn NDP").

Pro Vision are instructed by Living Land who have an interest in the Land to the east of Cotterstock Road, Oundle ("The Site"). The Site is known to the Council, having been promoted for development since 2008.

The Site is referred to as "Site 19" in the report prepared by Roger Tym and Partners in 2009 for the Rural North Oundle and Thrapston Plan. The report states "*Although this site is relatively prominent from the east, it scores quite well ... and is generally considered suitable, available and achievable for housing.*" In the most recent Regulation 18 Consultation on a Local Plan Part 2 for the District, the Site was given reference CFSU18.

The Site straddles the administrative boundaries of Oundle Town Council and Glaphorn Parish Council. The southern half of the Site is referred to as Site 23 by Oundle Town Council and is proposed for allocation in the emerging Oundle Neighbourhood Plan, whilst the northern half is referred to as Site A2 by Glaphorn Parish Council. The Site is however one land parcel, with no physical features delineating the northern and southern portions on the ground.

A location plan is enclosed with this representation to identify the Site.

Background to Representations

The Rural North Oundle and Thrapston Plan ("the RNOTP") was adopted in 2011. Chapter 8 sets out the strategy for Oundle and Paragraph 8.18 states:

"PPS3 requires the Plan to indicate possible locations for housing development from 11-15 years from the date of adoption, i.e. from 2018/19 till after 2021. The Sustainability Assessment work has identified two particular sites which stand out as possible longer term site allocations. These sites, which could come forward following reviews of the Core Strategy and this Plan, are:

- *Land to the rear of the Cemetery, Stoke Doyle Road (230 dwellings capacity);*
- *Land off Cotterstock Road/ St Peter's Road (200 dwellings capacity)."*

The Site has therefore already been assessed at a District level and found to be suitable for residential development in the Adopted Development Plan.

Further, in the East Northamptonshire Local Plan Part 2 Regulation 18 consultation, and at Paragraph 14.3(3) it was stated that a Neighbourhood Plan for Oundle would make small scale allocations, and that "*Additional housing land allocations at Oundle, to meet residual requirement (200-210 dwellings, 2016-2031)*" need to be made through Local Plan Part 2. The Site was identified in the table at Paragraph 14.9 as having capacity for approximately 200 dwellings. It therefore seems clear that the District Council consider this Site continues to have potential to meet the housing needs of Oundle town.

The Site is sustainable and well connected to the town of Oundle. The Site is bordered on two sides by existing residential development and is within walking distance of a public bus, recreational facilities and school. Oundle Town centre is also accessible on foot. The site is suitable for development with no overriding physical constraints as established by the site assessment work undertaken in respect of the RNOTP, the emerging Oundle Neighbourhood Plan and the Glapthorn NDP. Living Land confirm that the site is available now; and has a reasonable prospect, subject to planning, of being developed within the Plan Period.

Basic Conditions Test

Only a draft Neighbourhood Plan that meets each of the basic conditions set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004, can be put to a referendum and be made. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the 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 Neighbourhood Plan;
- 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 Neighbourhood Plan;
- d) the making of the Neighbourhood Plan contributes to the achievement of sustainable development;
- e) the making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the Development Plan for the area of the authority;
- f) the making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations; and
- g) prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Plan.

Section 3 – Planning Policy Context

This section of the Glapthorn NDP sets out the key policy documents which the NDP must have regard to and be in general conformity with in order to satisfy the basic conditions.

Whilst it is understood that no specific housing requirement has been allocated to Glapthorn, Policy 29 of the North Northamptonshire Joint Core Strategy requires the Market Town of Oundle to accommodate a minimum of 645 dwellings over the plan period. Given that the Glapthorn Neighbourhood Plan abuts the boundary of Oundle Town, it is necessary to ensure that the

Glaphorn Neighbourhood Plan does still allow sufficient flexibility for future development and does have regard to the Adopted RNOTP and the emerging Local Plan Part 2.

The Glaphorn NDP only proposes small scale development on 8 sites within the Glaphorn village to deliver 22 houses over the Plan Period. In this regard, the plan seeks to maintain the linear nature of the village in order to ensure that development respects the rural character of the village. We have no objection to these allocations, which are clearly proposed to allow the village to expand and evolve sustainably in order to maintain the vitality of this rural community.

We do however object to the attempt by the Glaphorn NDP at Paragraph 3.12 to restrict any future development on the part of the Site which falls within the Glaphorn Neighbourhood Planning area.

Paragraph 3.12 states: *"The following extant policies of the RNOTP will remain applicable to the Glaphorn Neighbourhood Plan and are complementary to the GNP policies except as stated below..."*. Beneath this paragraph is a table, and the relevant extract in relation to the site is copied below:

| Carry forward of extant RNOTP Policies into the Glaphorn Neighbourhood Plan | |
|---|--|
| RNOTP Extant Policies | Applicability and Modification in GNP |
| Paragraph 8.18 Longer Term Strategy | The reference to that part of the "Land off Cotterstock Road to St Peter's Road" which falls within Glaphorn Parish shall no longer be applicable. |

In the Consultation Statement which forms part of the evidence base to this Regulation 16 consultation, it is stated that *"The purpose of the neighbourhood plan is to consider afresh the housing needs and land supply for housing in each neighbourhood. The GNP has concluded that the site A2 is not required for open market housing."* It goes on to state: *"The Plan will be amended to make more explicit reference to RNOTP para 8.18 and delete the site A2 as a possible longer-term site allocation (open market housing) within the Plan period"*.

The Glaphorn Plan should be *in general conformity with the strategic policies contained in the Development Plan*. It should not propose to delete the part of the policy which it is not in conformity with. This is a clear attempt by the Glaphorn NDP to stifle the development potential of the Site and this fails to contribute to the achievement of sustainable development. As such, this statement fails to meet the basic conditions (d) and (e).

Further, the Planning Practice Guidance makes clear that blanket policies within Neighbourhood Plans restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence (Paragraph: 044 Reference ID: 41-044-20160519). With this in mind, we consider that the Glaphorn NDP fails to meet basic conditions (a), (d) and (e).

Policy 2 - Settlement Boundary

Policy 2 of the Glaphorn NDP defines a Settlement Policy for the village, and states *"Except for housing development that complies with NNJCS Policy 13 (Rural Exceptions), housing development in Glaphorn Parish shall be contained within the Settlement Boundary of Glaphorn Village."*

Whilst it is clearly desirable to define a Settlement Policy Boundary for the village, we object to the reference to only Policy 13 of the North Northamptonshire Joint Core Strategy (the NNJCS") in this Policy.

Policy 11 of the NNJCS states that *"Development will be distributed to strengthen the network of settlements in accordance with the roles in Table 1 and to support delivery of the place-shaping principles set out in Table 2. The special mixed urban/rural character of North Northamptonshire with its distinctive and separate settlements will be maintained through the avoidance of coalescence"*. Policy 11 defines Oundle as a Market Town and states that *"The Market Towns will provide a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town ... Provision will be made for new housing as set out in Policy 28. Any proposals for significant additional growth should be tested and supported through Part 2 Local Plans or Neighbourhood Plans"*. Part 2 of Policy 11 deals with the rural areas and states *"Development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement"*.

In order to bring Policy 2 into conformity with the basic conditions, we suggest it should be amended as follows:

"Except for housing development that is necessary to meet the role of Oundle as a Market town in accordance with Policy 11 of the NNJCS, or which complies with NNJCS Policy 13 (Rural Exceptions), housing development in Glapthorn Parish shall be contained within the Settlement Boundary of Glapthorn Village."

Should any development be proposed on the part of the Site which falls within Glapthorn Parish, Policy 8 of the Glapthorn NDP would be applicable, and will require the application to demonstrate how it minimises the impact on the open countryside between Glapthorn and Oundle.

Sections 6.7 (Sites in the Wider Parish) and 6.8 (Site Assessments for Development on Oundle / Glapthorn Boundary)

There were four sites considered by the NDP group on the boundary between Oundle and Glapthorn. Only one of these sites, the land east of Cotterstock Road, is straddled by the Oundle Town boundary and is proposed for allocation in the Oundle NDP.

Paragraph 6.7.1 of the Glapthorn NDP recognises: *"Any housing numbers need to be seen in the context of the Oundle allocation in the NNJCS as clearly, they would service the market town's needs despite being physically located in Glapthorn Parish. As such, any site allocations in the GNP need to be set in the context of spatial and sustainability policies which ensure coherence between the two Neighbourhood Plans of Glapthorn and Oundle."*

Paragraph 6.8.2 suggests that Oundle Town Council *"is at a broadly similar stage to Glapthorn in the development of its Neighbourhood Plan"*. This is incorrect. There has been little public engagement to date on a Neighbourhood Plan for Oundle, and no Regulation 14 consultation on a draft Plan. Even though Oundle Town Council considers it *"has allocated sufficient sites to meet its housing need"* there has yet to be any scrutiny of the Town Council's approach to site selection. It is understood that the Town Council is proposing to allocate significant numbers of houses to sites which are remote from the town, and which have been found to be unsuitable and unsustainable for housing in the site assessment work undertaken for the District Council as part of the RNOTP evidence base. There is therefore significant doubt as to whether a Neighbourhood Plan for Oundle prepared on that basis could be found to contribute to the achievement of sustainable development. As such, it is imperative that the Glapthorn NDP does not stifle the potential of Site A2 to come forward to meet Oundle's needs.

The Glapthorn NDP goes on to state at Paragraph 6.8.2 that "*The Town Council has expressed the view that the allocation of sites in Glapthorn Parish which border on Oundle would be inconsistent with Oundle Council's spatial strategy and unnecessarily increase pressure on existing infrastructure.*" This statement is nonsensical when the Town Council is proposing to allocate the southern half of the site for development. The inclusion of such a statement within the Glapthorn NDP is unnecessary.

From the statements made at Sections 6.7 and 6.8, it appears that there is an attempt by Oundle Town Council to use the Glapthorn NDP as a vehicle to stop development on a sustainable site adjoining the town. We consider that the Glapthorn NDP should be seen as a means by which development and change can be managed sustainably; recognising that there will be a need for ongoing development to maintain the role of Oundle as a Market Town whilst also preserving the rural character of Glapthorn village and a degree of separation between the two.

Whilst basic condition (e) is about general conformity with Adopted Plans, and not subsequent or emerging plans, it is clear that there is a need for housing in Oundle that is not yet met by an Adopted Development Plan. In that context, it is clearly desirable to ensure that the Neighbourhood Plan for Glapthorn provides positive guidance to inform how development on the Parish boundary should take place, rather than simply opposing any change. In that way, the Glapthorn Neighbourhood Plan will accord with the objective of Paragraphs 16 and 184 of the Framework and contribute to the achievement of sustainable development.

Conclusion

The administrative boundary between Oundle Town and Glapthorn Parish is an arbitrary line which is invisible on the ground. Whilst the Land at Cotterstock Road falls within two Neighbourhood Planning Areas, both Oundle Town and Glapthorn Parish have found the site as suitable for development. Page 27 of Appendix 5 of the Glapthorn NDP evidence base confirms that the location of the site "*is not adverse*" and that development would have a "*minimal impact*" on the rural character of the area. This is consistent with the earlier assessment work undertaken by the District.

Pro Vision recognise the role of Neighbourhood Planning as a tool for local people to shape the development of their local community. However, it is clear that Neighbourhood Plans must be consistent with the National Planning Policy Framework and the up-to-date strategic requirements for the wider Local Authority Area. Neighbourhood Plans should also not attempt to restrict sustainable development in adjoining settlements and there is no justification or evidence in this case to seek to prevent sustainable development on this site from coming forward in the future.

We consider that the Glapthorn Neighbourhood Plan in its current form does not comply with basic conditions (a), (d) and (e). As such, the Plan should not proceed to Examination and should be modified to enable, rather than restrict, sustainable development on this cross-boundary site as required to meet the identified housing needs.

Yours sincerely



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