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Please ask for
Michael Burton

Tel
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Our Ref.
MB/ONP-Reg15

Your Ref.

Date:
9 July 2019

Dear Emma and Peter

Draft Oundle Neighbourhood Plan 2011-2031, submitted 24 May 2019: Legal Check under Schedule 4B of the Town and Country Planning Act 1990

I write to you on behalf of East Northamptonshire Council (ENC) to confirm our receipt of the submission version of your draft neighbourhood development plan (the Oundle Neighbourhood Plan 2011-2031), along with accompanying supporting documentation. Firstly, I would like to wholeheartedly congratulate the Oundle Neighbourhood Plan Group (ONPG) on successfully reaching the submission stage in the neighbourhood planning process.

As you may be aware, under Paragraphs 5 and 6 of Schedule 4B of the Town and Country Planning Act (TCPA) 1990 there is now a requirement for ENC, as the local planning authority, to undertake a check of the compliance of the plan along with its process to date. The relevant legal tests are set out in the 1990 TCPA and relevant sections of the Planning and Compulsory Purchase Act (PCPA) 2004. It is then an obligation of the local planning authority to issue a written statement clarifying the compliance (or otherwise) of the plan. Accordingly, this letter comprises the formal view of ENC and recommends whether it should be submitted for independent examination.

At this stage it is not a duty of the local planning authority to consider the plan proposal against the 'basic conditions' tests set out under Paragraph 8(2) of the TCPA 1990 (this is the role of the independent examiner). Nevertheless, I can confirm that whilst ENC is of the opinion that the draft Neighbourhood Plan is in general conformity with relevant national and local strategic policy it does however raise issues of concern in relation to compliance with extant strategic policy, as set out below in the Council's initial review of the submission.

With regards to the relevant EU obligations (specifically, SEA Directive 2001/42/EC), the Plan and supporting documents, as submitted on 24 May 2019, did not fulfil a requirement of The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No 1633); the Strategic Environmental Assessment (SEA) regulations (Regulation 12). In order to comply with this statutory requirement, we consulted the relevant consultation bodies (Environment Agency, Historic England and Natural England) regarding the Sustainability Appraisal (SA) Report, over a 5-week period (31 May – 5 July 2019, inclusive). The respondents confirmed that the Sustainability Appraisal fulfils the requirements of the SEA regulations.

I note that your submissions also include the Basic Conditions Statement, which provides your detailed consideration of the plan submission against the requirements of the TCPA 1990 and the PCPA 2004. In a similar manner, I am pleased to confirm the following on behalf of ENC:

- The plan **DOES** accord with all relevant provisions of the PCPA 2004 in that it: specifies a plan period; does not include any provision for excluded development; and does not relate to more than one neighbourhood area;

Council for the District of East Northamptonshire

- The plan **DOES NOT** comprise a 'repeat proposal' as defined under Paragraph 5 of the TCPA 1990;
- The plan **HAS** been prepared by a qualifying body (Oundle Town Council) who are authorised to deliver a neighbourhood plan;
- The submission **DOES** comprise the relevant documentation required under Paragraph 1 of Schedule 4B of the TCPA 1990 and as prescribed by Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ('the Regulations');
- The statutory consultation undertaken to date **DOES** comply with the requirements and regulations set out under Paragraph 4 of the TCPA 1990 and as prescribed by Regulation 14 of the Regulations; and
- The plan **DOES** comply with all other provisions under section 61E(2), 61J and 61L of the TCPA 1990.

To assist the process, I have also briefly prepared an initial check (attached as an annex to this letter), highlighting instances where, in my professional opinion, there is a possibility that the draft Plan could be challenged with reference to the Basic Conditions.

The Oundle Neighbourhood Plan will now be publicised under Regulation 16 of the 2012 Neighbourhood Planning (General) Regulations, as amended. Following this, the plan will be made available for independent examination.

ENC is now required to publicise the Neighbourhood Plan along with details of how to make representations to it on its website for a minimum of 6 weeks. In accordance with Regulation 16, consultation will take place from **Friday, 12 July – Tuesday, 27 August 2019** inclusive (6 weeks).

Alongside this the Council can assist in publicising and consulting on the plan to ensure the regulations and the Council's Statement of Community Involvement are properly met. Alongside the Regulation 16 consultation we will begin the process for the appointment of an independent examiner for the Oundle Neighbourhood Plan, who will start the examination during **September/ October 2019**; soon after the end of the Regulation 16 consultation.

Finally, on behalf of ENC this letter represents the Council's formal view that the draft Oundle Neighbourhood Plan, as submitted and covering the remainder of the current Local Plan period to 2031, complies with all of the relevant statutory requirements. Please do not hesitate to contact me if you have any further queries regarding the neighbourhood planning process from hereon.

Yours sincerely

Michael Burton
Principal Planning Policy Officer

East Northamptonshire Council

Oundle Neighbourhood Plan – submitted 24 May 2019 (Regulation 15, Neighbourhood Planning (General) Regulations 2012, as amended)

Initial review of the submission version Neighbourhood Plan, to accompany Legal Check under Schedule 4B of the Town and Country Planning Act 1990

Paragraph/ Policy number in Plan	ENC comments
Paragraph 1.8-1.9	<p>Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment</p> <p>A major challenge in preparing the draft Oundle Neighbourhood Plan for submission has arisen through the need to ensure compliance with the 2004 Strategic Environmental Assessment (SEA) Regulations.</p> <p>It would be helpful to insert a timeline following paragraph 1.9, to explain the key milestones for the SEA/ Sustainability Appraisal (SA) process; e.g.:</p> <ul style="list-style-type: none"> • November/ December 2018 – SEA screening process undertaken, which confirmed that a full SA would be required • January/ February 2019 – Oundle Town Council consulted with SEA consultation bodies (Environment Agency, Historic England and Natural England) regarding the SEA screening opinion • March – May 2019 – Preparation and publication of full draft SA report • May – July 2019 – Consultation with SEA bodies re draft SA report
Paragraph 1.11	<p>Evidence base, Community Engagement and Consultation</p> <p>Suggested cross reference to Statement of Consultation at the end of paragraph: “<i>Further details of these events is set out in the Statement of Consultation [web link]</i>”.</p>

Paragraph/ Policy number in Plan	ENC comments
Paragraph 2.16	<p>1st sentence Editorial/ minor change – typographical errors in paragraph 2.16 needs re-wording.</p>
Paragraph 2.18	<p>State Schools Paragraph 2.18 explains the current position regarding the potential for redevelopment of the former Milton Road primary school site. It is probably better to state, more generically, that covenants restrict the redevelopment/ re-use of the former primary school site to educational uses.</p>
Paragraph 2.22	<p>Services and Facilities Paragraph 2.22 states that Oundle still has two banks. Please confirm if this is still the case (or possible closure dates, where applicable), so that the text can be factually updated.</p>
Policy O1	<p>The Settlement Boundary In defining a settlement boundary, it is important to ensure that the boundary is applied consistently. It is important to note that the current Local Plan Part 2 (Rural North, Oundle and Thrapston Plan/ RNOTP) settlement boundaries pre-date the National Planning Policy Framework and are therefore now outdated. The “Braesby” appeal decision (Glaphorn: APP/G2815/W/16/3149683, 11 August 2016) highlighted a need to review settlement boundaries if there is a desire to retain or designate these in a Neighbourhood Plan.</p> <p>In the cases of Brigstock, Glaphorn, King’s Cliffe and Warmington; these respective Neighbourhood Plans all sought to retain the settlement boundaries from the RNOTP. In all cases however, they were required to review these through the Neighbourhood Plan preparation process.</p> <p>It is noted that the Oundle boundary has been reviewed to take account of the proposed housing land allocations. However, we do raise a number of concerns about how the boundary has been applied:</p> <ol style="list-style-type: none"> 1. To the north of the town, the boundary on the draft policies map includes parts of the Oundle area that are situated within Glaphorn Parish. This raises some possible legal issues, although it is recognised that the practical application of a settlement boundary would entail this. This issue could be overcome by a clear statement that the boundary, where this falls within Glaphorn Parish, is shown as indicative on the policies map, for the purposes of completeness and interpretation, although it lies beyond the designated Neighbourhood Area. 2. Around the Prince William School buildings it is noted that the

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	<p>previous RNOTP settlement boundary has been retained. It is asserted that this is outdated given that a number of school buildings have, in the decade since the boundary was drawn, been developed beyond the defined boundary. This has implications for the status of the land to the north and south of Prince William School within the A605 bypass.</p> <p>Attention is drawn to the settlement boundary criteria in the RNOTP (current Local Plan Part 2, paragraph 4.5). Given the expansion of the Prince William School buildings to the east within the last 8-10 years, we consider that this site should be included within the settlement boundary, given that it is “<i>bounded by existing or committed development on all sides but one</i>” (RNOTP paragraph 4.5(e)). This criterion, which pre-dates the NPPF, is proposed for modification in the emerging Local Plan Part 2 (EN2), in accordance with the adopted North Northamptonshire Joint Core Strategy (JCS) 2011-2031. The latter specifies that land is considered as falling within main built up areas where bounded by built curtilages on at least two sides (paragraph 5.17). This is less stringent than the earlier equivalent (RNOTP) criterion, which refers to “all sides but one”.</p> <p>Furthermore, the draft Local Plan Part 2, which will entirely replace the RNOTP in due course, states that: “<i>infill development will generally be supported in the urban areas where it...is unlikely to be of any beneficial use as open land, including for agriculture</i>” (Policy EN2(f)). Within the past decade, the area around Prince William school has been, and is proposed to be, subject to significant urban intensification; in particular the proposed Neighbourhood Plan site allocation to the south of Herne Road. It is considered that the impact of this development will significantly alter the character of this part of the town.</p> <p>Overall, it is considered that if the settlement boundary criteria are correctly applied, then the St Christopher’s Drive site (proposed in the Local Plan Part 2) forms a part of the existing built up area. This is surrounded on three out of four sides by built development, and on the 4th (eastern boundary) by the A605 bypass. Furthermore, it has no function as public open space or agricultural land, so should also be included within the settlement boundary in accordance with the relevant criterion (JCS paragraph 5.17/ Local Plan Part 2 Policy EN2(f)).</p> <p>Finally, we raise some concerns regarding the wording of Policy O1; e.g. reference to compliance with rural policies, as opposed to other plan policies. It is suggested that the policy should be re-worded in the interests of clarity.</p>

Paragraph/ Policy number in Plan	ENC comments
Policy O3	<p>Important Open Space Proposed amendments to 2nd paragraph/ section, in the interests of clarity: <i>“Planning permission may be granted for a small, ancillary building on an area of Important Open Space where related to the existing sports provision on functions of the site”.</i></p>
Policy O4	<p>Other Amenity Land Proposed amendments, in the interests of clarity: <i>“Proposals that would result in the loss of amenity land that contribute to the character and visual amenity of an area will only be supported where it can be demonstrated that the benefits of development clearly and demonstrably outweigh the loss of the amenity land”.</i></p>
Policy O5	<p>The Provision and Enhancement of Open Space Proposed amendments to criterion (2), in the interests of clarity: <i>“Make provision for the long-term management of new open spaces made necessary by the provided as part of new developments”.</i></p> <p>It should be noted that the emerging Local Plan Part 2 proposes lower thresholds than those used in the Neighbourhood Plan. However, it is noted that the standards proposed in the latter are taken from strategic policies of the adopted Local Plan.</p> <p>The proposed Millers Field wildlife area needs to also be included as a criterion within Policy O19.</p>
Policy O6	<p>Achieving high quality design Criterion (2) – Add reference to the quantum of outside amenity space to 2nd criterion.</p>
Paragraph 5.31/ Policy O10	<p>Site for Leisure and Recreation, Land off Benefield Road For clarity, it may be appropriate to emerge Policy O10 into O22, but include cross reference at paragraph 5.31.</p>
Paragraph 5.35/ Policy O11	<p>Safeguarding Employment Sites Proposed amendments, in the interests of clarity:</p> <p>Paragraph 5.35: <i>“Policy O11 therefore safeguards key employment areas unless it can be demonstrated that there is no reasonable prospect of the site being used for employment purposes existing employment uses being sustained”.</i></p> <p>Policy O11: <i>“Existing employment sites at Nene Valley Business Park, East Road and the Wharf, shown on the Policies Map, will be safeguarded for employment unless it can be demonstrated that this can no longer be sustained there is no reasonable prospect of the site being used for employment purposes”.</i></p>

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Paragraph 5.42/ Policy O13	<p>The Enhancement of Community Facilities and Services Policy O13 includes reference to Car Parks as “community facilities and services”.</p> <p>Town centre car parking should be dealt with through a separate policy. The final paragraph of Policy O13 does explain the approach for including car parking within the policy. However, for clarity it would be more appropriate to move this explanatory text into the supporting text for a new car parking policy.</p>
Paragraphs 5.53-5.85	<p>Meeting Housing Requirements The approach to site selection/ allocation has proven to be the most challenging aspect of the Oundle Neighbourhood Plan process.</p> <p>This sub-section of the Neighbourhood Plan document needs to provide a clear explanation/ executive summary, outlining the site shortlisting/ selection process. It is important that the Oundle Neighbourhood Plan is clearly evidenced. Feedback regarding individual paragraphs/ policies is set out below.</p> <p>Within the chosen sites, it may be appropriate to consider whether these would be appropriate to accommodate specialist housing.</p>
Paragraph 5.55	<p>Introduction It is advised that the Neighbourhood Plan should contain a clear web link to the Housing Methodology paper.</p>
Paragraph 5.56	<p>Housing Site Allocations The explanatory text regarding the residual housing requirements (paragraph 5.56) is based upon outdated data. The latest housing land position, as at 1 April 2018, is set out in East Northamptonshire Council’s Housing Background Paper, June 2019 (Planning Policy Committee 10 June 2019, Item 5 Appendix 3¹).</p> <p>Paragraph 5.56 should therefore be updated, as follows: <i>“Policy 29 (Distribution of new homes) of the Joint Core Strategy requires Oundle to accommodate 645 new dwellings between 2011 and 2031. Existing commitments (i.e. homes completed since 2011 and dwellings which are on sites allocated in a Local Plan or have planning permission but have yet to be either completed or started) totalled 437 574 at 31st March 2018. This indicates that the Neighbourhood Plan needs to allocate land for a minimum of 208 172, or 242 dwellings if remaining site allocations from the</i></p>

¹ https://www.east-northamptonshire.gov.uk/meetings/meeting/964/planning_policy_committee

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	<i>current Local Plan Part 2 (Rural North, Oundle and Thrapston Plan) – for which deliverability is uncertain – are excluded².</i>
Paragraph 5.58	<p>Housing Site Allocations Paragraph 5.58 provides a brief generic explanation of the spatial approach. It does not, however, provide sufficient explanation of the site shortlisting process.</p> <p>The supporting text (in/ around paragraph 5.58), needs to cover the following:</p> <ul style="list-style-type: none"> • No of sites initially assessed; then • No of sites shortlisted; and finally • A generic explanation as to why shortlisted sites were excluded; e.g. due to particular constraints. <p>While it will not be necessary to specify individual sites that the Neighbourhood Plan is not proposing to allocate (this will be set out in the supporting SA/ Housing Methodology reports), the draft text should provide a succinct non-technical summary for the site selection process with the necessary headlines (e.g. No of sites discounted).</p> <p>It is important that the Neighbourhood Plan is supported by both the site assessment (Housing Methodology) paper (quantitative) and a further justification to explain how the site assessment data is translated into policy; i.e. site selection.</p>
Policy O15	<p>Oundle housing site allocations Four concerns are raised regarding the chosen site allocations:</p> <ol style="list-style-type: none"> 1. Site selection/ consultation process; 2. Deliverability of selected sites; 3. Conformity with strategic policies; and 4. Housing density.
Policy O15	<p>Site selection/ consultation process Concerns are raised about both the choice of sites and the process for site discounting. The 1st draft (Regulation 14) version of the Neighbourhood Plan (April 2018) proposed the allocation of seven sites, but sought to artificially constrain or restrict the extent of certain proposed sites.</p> <p>The submission version Plan has deleted two sites from the previous version of the Neighbourhood Plan – Cotterstock Road and St Christopher’s Drive – offset by an increase in numbers at Land</p>

² Housing Background Paper – Housing Requirement for the Local Plan Part 2 (Urban), June 2019:
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	<p>south of Herne Road. It is noted that the SA report does provide a rationale/ justification for this decision; in both cases predominantly related to highways/ access issues (Table 10).</p> <p>While it is accepted that the SA report provides an audit trail for the decision to discount the two sites from the 1st draft version of the Neighbourhood Plan this does raise issues around the Plan preparation process. It is accepted that the Oundle Neighbourhood Plan has been prepared in accordance with the requirements of the 2012 Regulations.</p> <p>However, questions are raised as to whether the decision to delete two sites in the submission version of the Plan without further consultation would fulfil the spirit of the Statement of Community Involvement³ (SCI), adopted December 2013 and currently being updated. The replacement SCI repeats the 2013 version, stating that: <i>“A key aim of consultation and engagement is to attempt to build consensus for the way forward in relation to development ... Whilst it is accepted that full consensus may not be possible, greater understanding may help minimise conflict in plan preparation”</i> (paragraph 4.3).</p> <p>The deletion of two sites and consequent increase of capacity at Land south of Herne Road (increasing from 45 to 120 dwellings) represents a significant change to the overall strategy. Accordingly, it is questioned whether the decision to delete previously proposed sites without further consultation prior to submission represents an appropriate approach to building consensus, as required by the Statement of Community Involvement. This decision could arguably increase conflict in the plan-making process; evidenced by local objections already being made to additional development at Herne Road.</p>
Policy O15	<p>Deliverability of selected sites</p> <p>The SA Report does appear to provide an objective assessment of four alternative approaches, together with a justification for the site selection process. What the SA does not however cover, is the achievability (i.e. deliverability) of individual sites.</p> <p>While the proposed Neighbourhood Plan sites are arguably all developable (i.e. identified by way of due process through the SA Report), the SA Report (as this is beyond its remit) does not include any consideration of achievability or deliverability. The Cotterstock Road and St Christopher’s Drive sites, proposed in the Local Plan Part 2, but ultimately rejected in the submission version Neighbourhood Plans are both at an advanced stage of progression towards submission of a planning application.</p>

³ https://www.east-northamptonshire.gov.uk/downloads/file/6776/statement_of_community_involvement

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	<p>Both Cotterstock Road and St Christopher's Drive have been subject to numerous technical studies/ assessments, in readiness for submission of applications in the coming months. By contrast, significant further work would be required before the Neighbourhood Plan sites could be brought forward for development. The site selection process has not considered the likelihood and probability that the Neighbourhood Plan sites could be delivered in the manner envisaged.</p> <p>Furthermore, Land south of Herne Road has not been actively promoted through the Local Plan process.</p> <p>Overall, the issue of achievability/ deliverability has not been considered as part of the site selection process. It is argued that, with the two most deliverable sites discounted, this raises concerns about the site selection process as a whole.</p>
Policy O15	<p>Conformity with strategic policies</p> <p>The decision to delete the Cotterstock Road site (Land east of Cotterstock Road/ north of St Peter's Road) represents a direct challenge to the adopted strategic policies of the Local Plan. Paragraph 8.18 of the Rural North, Oundle and Thrapston Plan (RNOTP), identified the Cotterstock Road site as being suitable as a longer term site allocation.</p> <p>The Glapthorn Neighbourhood Plan examiner concluded that that draft Neighbourhood Plan was seeking to undermine the RNOTP (adopted strategic policy), so <i>"cannot be found to be in general conformity with the strategic policies of the Development Plan unless a suitable modification is made"</i> (Examiner's Report⁴, paragraph 112). A decision to delete the Cotterstock Road is therefore considered to conflict with strategic policies of the adopted Local Plan.</p>
Policy O15	<p>Housing density</p> <p>Policy O15 proposes five sites, of greatly varying densities and capacities. The Local Plan (JCS) sets out an overall density standard of 35 dwellings per ha for the sustainable urban extensions (paragraph 10.15). This is the default position and should be applied, at a net developable area of 85% (equating to approximately 30 dwellings per ha) unless development constraints would restrict capacity.</p> <p>This is borne out in the NPPF, which states that housing should be delivered at an appropriate density. The NPPF emphasises that: <i>"it is especially important that planning policies and decisions avoid</i></p>

⁴ https://www.east-northamptonshire.gov.uk/downloads/file/10828/examiners_report

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	<p><i>homes being built at low densities, and ensure that developments make optimal use of the potential of each site” (paragraph 123).</i></p> <p>The table below provides an assessment of appropriate capacities for the proposed Neighbourhood Plan allocations. If the JCS standard is applied, this would increase the overall capacity of the proposed Neighbourhood Plan site allocations by 111, to 435 dwellings.</p> <table border="1" data-bbox="405 539 1374 1003"> <thead> <tr> <th>Site name</th> <th>Oundle Neighbourhood Plan Policy reference</th> <th>Developable area (ha)</th> <th>Proposed allocation</th> <th>Proposed development density</th> <th>Capacity (@85% of 35 dph)</th> <th>Capacity (rounded down)</th> </tr> </thead> <tbody> <tr> <td>Land south of Herne Road</td> <td>O18</td> <td>4.1</td> <td>120</td> <td>29</td> <td>122</td> <td>120</td> </tr> <tr> <td>Millers Road, Benefield Road</td> <td>O19</td> <td>0.5</td> <td>14</td> <td>28</td> <td>15</td> <td>15</td> </tr> <tr> <td>Land adjacent to Cemetery, Stoke Doyle Road</td> <td>O20</td> <td>2.5</td> <td>50</td> <td>20</td> <td>74</td> <td>70</td> </tr> <tr> <td>Land south of Wakerley Close</td> <td>O21</td> <td>1.1</td> <td>10</td> <td>9</td> <td>33</td> <td>30</td> </tr> <tr> <td>Land north of Benefield Road</td> <td>O22</td> <td>6.9</td> <td>130</td> <td>19</td> <td>205</td> <td>200</td> </tr> <tr> <td></td> <td>TOTAL</td> <td>15.1</td> <td>324</td> <td>21</td> <td>449</td> <td>435</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>[Mean Density]</td> <td></td> <td></td> </tr> </tbody> </table> <p>Critically, the proposed housing figures for sites O20-O22 are proposed at significantly lower densities than the Local Plan (JCS) requirement, without any justification.</p>	Site name	Oundle Neighbourhood Plan Policy reference	Developable area (ha)	Proposed allocation	Proposed development density	Capacity (@85% of 35 dph)	Capacity (rounded down)	Land south of Herne Road	O18	4.1	120	29	122	120	Millers Road, Benefield Road	O19	0.5	14	28	15	15	Land adjacent to Cemetery, Stoke Doyle Road	O20	2.5	50	20	74	70	Land south of Wakerley Close	O21	1.1	10	9	33	30	Land north of Benefield Road	O22	6.9	130	19	205	200		TOTAL	15.1	324	21	449	435					[Mean Density]		
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Policy O18	<p>Land South of Herne Road</p> <p>Policy text formatting needs correcting – should use sub-numbering/ lettering, for clarity; e.g. O18(a) or O18(1) etc.</p> <p>The submission version Neighbourhood Plan proposes the replacement of the St Christopher’s Drive and Cotterstock Road sites from the Regulation 14 version of the Plan by an increased quantum of development (from 45 to 120 dwellings) at land south of Herne Road. The SA report (Table 10) justified deletion of these sites predominantly due to highways/ access issues. This raises similar concerns regarding the implications of an increased quantum of development (75 dwellings) off Herne Road (single access point). It is not evidenced how the St Christopher’s Drive site would be unacceptable on highways grounds if an equivalent single larger-scale development, with a single point of access, is appropriate on an alternative site to the south (at the opposite side of Prince William School).</p> <p>Some concerns are also raised about the achievability of land south of Herne Road. This scheme is significant for the delivery of the Neighbourhood Plan as a whole, as land south of Herne Road is one of the two main proposed site allocations (>100 dwellings). As</p>																																																								

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	at submission (May 2019), no evidence had been provided as to the site's deliverability, although we note that a pre-application enquiry was received in July 2019.
Policy O19	<p>Millers Field, Benefield Road Land south of Benefield Road (known as "Millers Field") is considered to be an appropriate proposal, at an appropriate density. It is appropriate to allocate this for 15 dwellings through the Neighbourhood Plan, which will ensure that the site could be explicitly recognised as forming part of the housing land supply.</p> <p>It is noted that Policy O5 makes reference to "Allotments and Wildlife Area at Miller's Field". For consistency, reference to this should also be made within Policy O19.</p>
Policy O20	<p>Land adjacent to the Cemetery, Stoke Doyle Road Site O20 would bring forward part of the potential longer term site allocation proposed in the current Local Plan (RNOTP paragraph 8.18). The site also broadly corresponds to that shown in the 1st draft Local Plan Part 2 (November 2018).</p> <p>Nevertheless, the proposed site does not include the area of land to the west of Warren Bridge (in separate ownership). It is advised that the site allocation should be extended to the east to incorporate this land, and the capacity increased accordingly (from 50 to 70 dwellings).</p> <p>It should be noted that the capacity of the site may be limited by highways constraints relating to Warren Bridge on Stoke Doyle Road.</p> <p>Policy text formatting needs correcting – should use sub-numbering/lettering, for clarity; e.g. O20(a) or O20(1) etc</p>
Policy O21	<p>Land south of Wakerley Close Site O20 is recognised as being developable, although no evidence has been presented as to whether there is a development partner to secure implementation of the site. However, the capacity and density (>10 dwellings per ha) is inappropriate. The site should be allocated for at least 30 dwellings to meet the minimum density requirements.</p> <p>Policy text formatting needs correcting – should use sub-numbering/lettering, for clarity; e.g. O21(a) or O21(1) etc</p>
Policy O22	<p>Land north of Benefield Road The Biggin and Benefield Estate land, to the north of Benefield Road, provides for up to 19ha of potential development land to the east of Biggin Grange.</p>

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	<p>The Neighbourhood Plan proposes a mixed use development, releasing part of the land for residential development, with further land set aside for a festival field (draft Policy O10). The 1st draft Neighbourhood Plan proposed residential development immediately to the north of Benefield Road/ Wakerley Close, with a festival field to the rear (north). This has been amended in the submission Plan, proposing a long access road to the festival field, with housing to the north (rear). The NPPF requires that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses (paragraph 117). This includes achieving appropriate densities and well designed layouts.</p> <p>The proposed residential development would be detached from the main urban area, given that there is little opportunity to access the Creed Road residential area to the north. If the Neighbourhood Plan seeks to allocate this site, then the proposed development framework in the 1st draft version should be reinstated.</p> <p>Notwithstanding, the proposed development capacity is inappropriate. The proposed development area (approximately 7ha) should accommodate around 200 dwellings.</p> <p>Policy text formatting needs correcting – should use sub-numbering/ lettering, for clarity; e.g. O22(a) or O22(1) etc</p>

9 July 2019

Michael Burton

Principal Planning Policy Officer

East Northamptonshire Council