

Rural North, Oundle and Thrapston Plan (submitted 11 January 2008)

**“Regulation 29” consultation:
11 January – 22 February 2008 –
Response to representations received
from the East Midlands Regional
Assembly (EMRA), 30 January 2008**

12 May 2008



East Northamptonshire Council

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1. Introduction

- 1.1 The Rural North, Oundle and Thrapston Plan (RNOTP) and its accompanying Sustainability Appraisal Report were submitted to the Secretary of State on 11 January 2008. Submission of these documents was accompanied by a 6-week statutory consultation period under the Town and Country Planning (Local Development) (England) Regulations 2004, Regulation 29.
- 1.2 Residents and organisations were invited to submit representations on the RNOTP and accompanying Sustainability Appraisal Report between 11 January and 22 February 2008.
- 1.3 In its representation, received on 30 January 2008, the East Midlands Regional Assembly (EMRA) made a number of comments about the RNOTP document, together with individual policies. These raised some concerns about the scope of the Plan, together with the content of certain policies. This report sets out the Council's initial response to the issues raised by EMRA in their representation.

2. General matters regarding Rural North, Oundle and Thrapston Plan document

- 2.1 EMRA raised a number of potential areas of concern about the RNOTP document as a whole. Officers have considered these and the Council's initial responses are set out below.

Status of the North Northamptonshire Core Spatial Strategy (CSS)

- 2.2 EMRA has raised concerns about the situation and current status of the CSS. These state that if issues arise regarding the soundness of the latter or changes to the policy framework, the implications for both the timetable and content of the RNOTP will need to be considered.
- 2.3 The RNOTP has been prepared under the assumption that the CSS is fundamentally sound, and that it will be adopted within the timescale set out in the most recent Local Development Scheme (March 2007).

Scope of the Plan

- 2.4 EMRA is concerned that certain policies are strategic in nature and some seem to be generic development control policies. In answer, attention is drawn to the Development Plan Document Profile contained in the approved Local Development Scheme (attached). This was agreed with the Government Office for the East Midlands (GOEM) and the Planning Inspectorate prior to being finalised and approved in March 2007.
- 2.5 The LDS approved originally in 2005 also contained this DPD profile. The "Role and Subject" section of the profile clearly indicates that the Plan will contain an element of local spatial strategy and vision for this distinctive part of North Northamptonshire. It will also contain policies relating to specific areas where individual development, conservation or design considerations apply.
- 2.6 The Joint Core Spatial Strategy is a higher level Plan than a core strategy covering an individual district. It concentrates very much on delivery of major growth in the urban core. The opportunity was taken to produce Area Plans within this wider strategic context, in order that local spatial relationships could be recognised and a locally distinctive DPD produced. East Northamptonshire has clearly distinct areas; with a sparser rural north based around market towns, and a more urbanised south, with closer linkages to Wellingborough, Northampton and Bedford. National policy and accompanying guidance, including Planning Inspectorate advice, does not preclude the Area Plan approach; indeed the need for locally distinctive Plans is stressed, with the corollary being that there is no standard template offered for the precise scope and format of DPDs.
- 2.7 The document is primarily a site specific proposals document, but it contains some strategic policies, which are intended to supplement and support the North Northamptonshire Joint Core Spatial Strategy (CSS).

- 2.8 One example of this is Policy 1: Settlement Roles. CSS Policy 1 defines Oundle and Thrapston as rural service centres, with King’s Cliffe as a local service centre. However, the development strategy for the other 49 villages within the Plan area is not defined. CSS Policy 1 states the need for development to be focused upon villages performing a limited service centre role. RNOTP Policy 1 defines Nassington and Warmington as “smaller service centres”, thereby applying CSS Policy 1 in the context of the Plan.

Repetition of national and regional policies

- 2.9 EMRA has noted that certain policies appear to overlap with national policy and/ or joint CSS policies. In such cases, it is accepted that such policies may contain some text which could be perceived in this way. However, in all cases where this may apply, the policy also contains more locally specific elements that add distinctiveness to the broader context.

Timescale for Plan

- 2.10 With reference to the timescale of the Plan, EMRA recognise that this has been prepared for the period of the adopted Regional Spatial Strategy (RSS8, March 2005) and emerging CSS, up to 2021. However, the Draft RSS extends to 2026, and reference is made to the implications of this in the Core Strategy (Paragraph 1.21). The need to include reference to the imminent adoption of the Draft RSS is accepted, and Council officers propose an additional paragraph in the RNOTP (to follow paragraph 1.15) making specific reference to this.
- 2.11 **In the interest of clarity, an additional paragraph following paragraph 1.15 is proposed as follows: “The new Regional Plan (RSS8) is likely to be adopted soon, which will run up to 2026 and supersede the current RSS8, adopted March 2005. Following this, a review of the Core Strategy (CSS, paragraph 1.21) will be undertaken to take this up to 2026. Similarly, this will be followed by an early review of the Plan, looking at longer term development proposals for the Plan area”.**

Delivery mechanisms – targets and indicators

- 2.12 EMRA has noted that the Plan needs to take into account key indicators and targets included in Appendix 1 of the Draft RSS. Full details are set out in the accompanying Monitoring Framework document, which was submitted alongside the RNOTP.

Vision and Plan Outcomes

- 2.13 EMRA has indicated that it is generally satisfied with the Plan Vision, in that this is in general conformity with the existing RSS8 and includes reference to themes set out in the Integrated Regional Strategy (IRS). However, it is noted that no specific reference is made to climate change issues and sustainable development principles.

- 2.14 Council officers accept that the Plan Outcomes do not make any specific reference to climate change. Objective 1 of the CSS relates to “Green Living”, including energy efficiency, sustainable construction methods and green technologies. However, officers remain keen to ensure that the RNOTP Outcomes are not merely a repetition of CSS Objectives, but instead provide a local focus for these.
- 2.15 It is emphasised that the RNOTP Outcomes are designed to complement and support the CSS Objectives. Critically, the Plan will be bound by the CSS Objectives (outcomes) throughout.

3. EMRA representations regarding individual RNOTP policies and proposals

- 3.1 EMRA raised concerns about individual policies in the Plan, together with concerns about certain sections of the supporting text. The Council's responses to representations regarding individual Plan policies are set out below.

Policy 1 – Settlement Roles

- 3.2 EMRA suggest a need for the RNOTP to specify linkages between “Greenfield” urban extensions to Oundle and Thrapston (RNOTP Policy 1) and paragraph 126 of the Milton Keynes and South Midlands Sub-Regional Strategy (MKSM).
- 3.3 **CSS Policy 10 sets out the need to identify smaller scale Sustainable Urban Extensions at Rural Service Centres. In effect, this incorporates MKSM paragraph 26 into the Core Strategy. It is therefore acknowledged that RNOTP paragraph 4.9 should include reference to specific CSS policies. Sentence 1, paragraph 4.9 should therefore be revised as follows: “In accordance with the Core Strategy (Policies 1 and 10), the principle housing and employment allocations...”**

Policies 3 and 4 – Phasing

- 3.4 EMRA argues that the phasing policies do not contain reference to housing delivery across the housing market area (HMA) and to the release of later phases of development in that context.
- 3.5 **In response to a representation by GOEM, the merging of policies 3 and 4 with OUN1 and THR5 is proposed by the Council. Suitable wording will be drafted to incorporate these changes into policies OUN1 and THR5.**
- 3.6 In response to the issues raised by EMRA, it is considered that the housing trajectory contained in the CSS (Delivering Housing section including Figure 11 and Table 3), establishes the rate of housing delivery. This will set the development requirements for Oundle, Thrapston and the rural areas, while in this respect the RTOTP primarily acts as a “site specific proposals document”. Policies OUN1, OUN3, THR1 and THR5 set out the mechanisms by which phasing will be implemented.
- 3.7 It is anticipated that the proposed RNOTP allocations will be granted planning permission during 2008-10, with the King's Cliffe site (145-150 dwellings) likely to be granted planning permission during 2008 and those at Oundle and Thrapston in 2009-10. This means that the allocated sites in the Plan should yield additional housing from 2010-11. The continuing high level of developer interest and ongoing pre-application discussions indicate that sites will come forward in line with this trajectory.

Policy 5 – Comprehensive Development

- 3.8 EMRA suggests the need for this policy to include a reference to promoting carbon neutrality. However, officers do not consider this to be a necessary addition to this particular policy.

- 3.9 Broadly, it is considered that CSS Policy 15 provides a sufficiently detailed framework with regard to energy efficiency, renewable energy and climate change.

Policy 8 – Parking Standards

- 3.10 EMRA notes that the policy sets slightly higher residential parking standards than those in the Parking SPG. Concerns are raised that the policy may be contrary to Policies 44 and 46 in the draft Regional Plan.
- 3.11 Discussions have taken place throughout the RNOTP preparation process regarding the setting of appropriate parking standards. As a result of the earlier “Design for the Future” (Issues and Options) and Preferred Options consultations, higher parking standards have been set, to address local concerns about the inadequacy of residential parking in the rural service centres (Oundle and Thrapston). Indeed, many representations were received stating that standards of 3 or 4 spaces per dwelling should be set, which would clearly contradict national and regional policies.
- 3.12 The 2 spaces per dwelling standard was set as a modest rise to address local concerns, while recognising the need to broadly comply with national and regional policies with respect to parking. With the exception of the 2 spaces standard, the Parking SPG sets out the remaining standards.

Policy 16 – Wind Farms

- 3.13 EMRA has stated that the draft Regional Plan recognises that there are some opportunities for wind farm development in Northamptonshire. EMRA implies that the RNOTP should accord with Policy 39 of the draft Regional Plan. The Council, however, has raised substantial concerns about the likely landscape impacts of renewable energy generation schemes, particularly new wind farms, in the Plan area.
- 3.14 The Council’s position has been borne out by the recent (August 2007) appeal decision on the Hemington wind farm proposals. The proposed site has no special landscape designations, but the Inspector concluded that the impacts “of the proposals on the character and appearance of the rural surroundings and on the users of nearby public rights of way are not offset by the need for renewable energy” (APP/G2815/A/06/2019989 paragraph 68).
- 3.15 Given that the Plan area is predominantly rural and considering the conclusions of the Hemington appeal, it is likely that few or no sites within the Plan area will be suitable to accommodate the development of significant new wind farms.

Policy 18 – Considerate Construction

- 3.16 EMRA has questioned whether Policy 18 is appropriate for a “spatial” plan, but suggest that the policy could be broadened to include references to the reuse and recycling of demolition waste. The policy has been prepared to minimise the acute, short term problems of environmental pollution and nuisance that inevitably occur during the construction phase for any new development.

- 3.17 The Council has a number of environmental enforcement policies already in force. Of particular relevance to new construction projects are the General, Noise and Waste Enforcement Policies (November 2006). These set out the Council's approach towards implementing the broad range of extant environmental protection legislation.
- 3.18 Policy 18 is designed to take a positive approach towards minimising environmental problems during construction phases, by recognising and supporting contractors and site managers who are committed to the industry Code of Considerate Practice.

Policy 19 – Affordable Housing Targets

- 3.19 EMRA has expressed general support for the approach to setting affordable housing targets in Policy 19. The numerical targets are welcome, while full details of the mechanisms for securing affordable housing are set out in the Council's Housing Strategy and other key evidence documents.

Editing Changes

- 3.20 EMRA has identified one editorial correction to the Proposals Map, where a symbol has been omitted from the key. It is also proposed that Figure 1 (page 9) should show more clearly the area covered by the Core Spatial Strategy
- 3.21 **The Council notes and accepts that editorial changes may be necessary, in the interests of clarity and consistency. The final version of the RNOTP will incorporate any editorial changes or updates wherever necessary.**

4. Conclusions

- 4.1 Sections 2 and 3 (above) sets out Council officers' responses to the various issues that EMRA has raised about the RNOTP submission document, together with responses to representations about individual Plan policies.

Changes to the Rural North, Oundle and Thrapston Plan accepted by officers

- 4.2 Certain possible changes have been put forward by EMRA in the interests of clarity. Such changes are accepted by officers. These changes are:
- Additional text following paragraph 1.15, to clarify the Plan's context and timescale, given the likely imminent adoption of the new Regional Plan (to 2026).
 - Additional text in paragraph 4.9, to provide cross reference to CSS Policies 1 and 10.
 - Editing changes to Figure 1 (page 9) and Proposals Map.

Other issues

- 4.3 This report sets out Council officers' response to EMRA's representations. EMRA has raised concerns about the scope of the Plan, particularly the inclusion of certain strategic policies and the lack of a specific housing trajectory. In other cases, EMRA raises concerns about the scope and content of certain policies.
- 4.4 The background and justification for particular policies is set out above. Additionally, officers are currently preparing a schedule of evidence documents for each policy, to enable these to be systematically referenced.