

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

Schedule of proposed changes – Summary of representations and key issues raised

**“Regulation 33” consultation:
20 June – 1 August 2008**

August 2008



East Northamptonshire Council

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 two 6-week statutory consultation periods under the Town and Country Planning (Local Development) (England) Regulations 2004, Regulations 29, where residents and organisations were invited to submit representations on the RNOTP and accompanying Sustainability Appraisal Report between 11 January and 22 February 2008.
- 1.2 Arising from this consultation, 11 changes to the RNOTP were put forward by East Northamptonshire Council in the "Schedule of proposed changes" (16 June 2008). A further consultation for this was undertaken under Regulation 32, from 20 June – 1 August 2008, as agreed with the Planning Inspector.
- 1.3 This report, prepared under Regulation 33, outlines the main issues raised in the representations received regarding that Schedule of proposed changes. It is necessarily broad-brush and should be read in conjunction with the schedule summarising each individual representation.

Statement of representations received (Regulation 33(2)(a))

- 1.4 During the consultation period, **9** organisations submitted representations on the RNOTP, making approximately **25** separate comments which are considered to be duly made.
- 1.5 Only representations regarding one or more of the proposed amendments to the RNOTP set out in the Schedule can be considered to be duly made. Comments submitted which do not refer to the Schedule of proposed changes or relate to other issues that have arisen during the examination of the RNOTP are therefore not considered to be duly made.

Layout of this report

- 1.6 This report will identify the key issues which have been raised in respect of the Schedule of proposed changes to the RNOTP. The issues raised in respect of the different amendments described in the Schedule will be considered in turn.

2. Summary of representations received – main issues

General comments regarding the Schedule of proposed changes as a whole

- 2.1 Representations were received from three statutory consultees – Easton on the Hill Parish Council, the East of England Regional Assembly and Central Networks – regarding the Schedule of proposed changes in general. All stated that they had no further comments to make regarding the proposed amendments to the RNOTP and all are therefore classed as “supporting” representations.

Paragraph 1.15 proposed change (EMRA)

- 2.2 William Davis Ltd has argued that the proposed changes to the RNOTP, including the new paragraph after 1.15 referring to the RSS8 review, still do not address housing land supply issues.

Paragraph 4.14, Policy 3 and Policy 4 proposed changes (GOEM)

- 2.3 GOEM has expressed support for the replacement of policies 3 and 4 with a new paragraph providing a cross reference to the revised policies OUN1 and THR5 and advised that this addresses their earlier representation regarding the RNOTP, as submitted. These changes are also supported by Living Villages Ltd.
- 2.4 Against this, however, Oundle Town Council has argued that the removal of Policy 3 will effectively water down the requirement for a holistic approach to new residential development.

Policy 6 proposed changes (Natural England)

- 2.5 Natural England has expressed support for the proposed changes to Policy 2 and its supporting text, concluding that these will ensure that the RNOTP will have no adverse effect on the Upper Nene Valley Gravel Pits pSPA.

Policy 10 proposed change (GOEM)

- 2.6 GOEM recognises that the proposed change to Policy 10 provides additional clarification, but still does not consider that the revised policy adds anything of significance to the adopted CSS Policy 13.

Paragraph 5.3 and Policy 4 proposed changes (GOEM)

- 2.7 This editing change/ clarification satisfies GOEM’s earlier representation.

Policy OUN1 proposed changes (GOEM)

- 2.8 12 out of 25 (50%) of the submitted comments concern the proposed changes to Policy OUN1. Oundle Town Council has expressed opposition to the new Policy OUN1 wording and merging this with Policy 3. However, the Town Council argues that their concerns could be overcome by certain text changes which they propose, and the addition of the Policy 3 target to the OUN1 targets.
- 2.9 Representations submitted by William Davis Ltd and Persimmon Homes argue that the proposed changes to OUN1 still do not address housing land supply issues (examination Matter B, **DOC810**). They state that the policy, even with its proposed changes, does not address the issue of housing land supply or implementation, as is required by PPS3 (paragraph 62).
- 2.10 Representations submitted by GOEM, Persimmon Homes and Living Villages Ltd all maintain that the proposed revised Policy OUN1 remains overly restrictive. All refer to the Council's response to the 26 June 2008 Exploratory Meeting (**DOC909**), which acknowledges that the highway authority (County Council) has confirmed that the emerging transport strategy is not critical to determining the outcome of the Oundle strategy in the RNOTP (i.e. RNOTP Section 8).
- 2.11 GOEM, Persimmon Homes and Living Villages Ltd all propose revisions to Policy OUN1, to take account of the adopted CSS Policy 6 (**DOC259**). Generally, they argue that OUN1 needs to be positively worded and should clarify the status of the proposed town wide traffic survey and transport strategy.

Policy THR5 proposed changes (GOEM)

- 2.12 William Davis Ltd submitted a representation that the proposed changes to THR5 still do not address wider housing land supply issues in Thrapston.

3. Key issues

- 3.1 The majority of objections relate to the merging of Policy 3 and OUN1. Oundle Town Council, acting on behalf of the local community expresses concerns that the RNOTP approach, as set out in the submitted Plan, should not be watered down by the proposed changes.
- 3.2 Conversely, representations by GOEM and promoters of individual development sites in Oundle argue that the proposed changes, which were agreed early in June 2008 and published on 16 June, do not take into account subsequent issues arising from the Exploratory Meeting (26 June).