

### Summary of replies from organisational bodies: Policies EN24 - EN27 plus paragraphs 8.23 to 8.26 of the supporting text.

#### County Highway Authority

##### EN25 Stoke Doyle Road

- Subject to further investigation, a safe access off Stoke Doyle road should be achievable as there is good visibility in the location.
- There is very poor pedestrian provision along Stoke Doyle Road with no footway on the Lyvedon Brook bridge and a very substandard footway in other areas.
- There is no street lighting beyond Warren Bridge.
- The speed limit is 60 mph fronting the site and this would need to be reviewed and reduced with suitable traffic calming/gateway measures.
- There is no bus service within reasonable walking distance. The nearest is in West Street about 600m east of the site access, with no safe walking route.
- There may be an opportunity to upgrade footpath UF3 running from Stoke Doyle Road to West Street A427 or provide a footpath north to Clifton Drive to provide access to the bus stops adjacent to Pexley Court. This would bring the walking distance to about 400m which would be acceptable.
- A transport statement will be required to assess the impact of the development on the local highway network.

##### EN26 Cotterstock Road

- The main proposed access point is off Cotterstock Road which at this point is located on an existing bend which reduces visibility. Furthermore, the speed limit is 60 mph fronting the site and this would need to be reviewed and reduced with suitable traffic calming/ gateway measures. Further investigation is required regarding the mitigation to accommodate an access point here.
- Welcome the proposed access off St Peter's Road which subject to further investigation would be desirable for vehicles and pedestrians to provide 2 points of access.
- There is very poor pedestrian provision along Cotterstock Road with no footway and the existing footway on the eastern side of Cotterstock Road will need to be extended from the existing zebra crossing to the site. A controlled crossing point (signalised or zebra) will need to be provided to allow safe access across Cotterstock Road to the primary school.
- There is no street lighting beyond that adjacent to the school pedestrian access point.
- A transport assessment is required to assess the impact of the development on the local highway network.

## EN27 St Christopher's Drive

- Access to the site appears to be off St Christopher's Drive which is a publicly maintained highway. The developer will need to satisfy themselves that their land directly abuts the highway.
- The site has a single point of access served by Ashton Road/Sutton Road/St Christopher's Drive. These roads appear to have a carriageway width of 5.5m. Ashton Road currently serves about 120 dwellings. An additional 120 dwellings would take the number served off a single point of access to about 240. An additional access would need to be provided as the maximum number served off a 5.5m wide road is about 150. (Note: these figures have subsequently been amended to indicate 200 dwellings can be served off this access and the number of dwellings it already serves have been calculated to be less than 100 dwellings).
- It is not clear how a second point of access would be provided however it may be possible to upgrade bridleway UF6 which runs south-east from the end of Ashton Road, however the site does not appear to abut the bridleway.
- Ashton Road would also need to be widened significantly to ensure access could be maintained in the event of road works as it would remain as the single point of access. There does not appear to be adequate highway width to achieve this
- There is no bus service within reasonable walking distance. The nearest is in Market Place (A427) about 900m east of the site access. This service is X4 hourly 7 days/week. A contribution to provide a minibus to connect to the X4 service may be required this is normally £1000/dwelling.
- A transport assessment is required to assess the impact of the development on the local highway network.

### **Officer response:**

**It is noted that the Highway Authority does not object to any of these sites being developed for housing. In principle, they are therefore considered acceptable from a highways point of view. In addition, no amendments to the Policies or text are considered necessary in relation to them. The points that are raised will need to be investigated as part of the process of applying for Planning Permission for each site.**

### **ENC Housing Strategy**

- Three strategic housing sites have been identified in Oundle and each will need to provide affordable housing and accommodation to meet the housing needs of the rapidly ageing population in the district. There is a need to provide an Extra Care Housing scheme for older people in the north of the district and Oundle is the preferred location due to the availability of transport and proximity to facilities.
- Policy EN25 Stoke Doyle Road, Oundle and EN26 Cotterstock Road, Oundle - The affordable housing requirement should be specified at 40% given that it is adopted policy in the Joint Core Strategy and that the 5% requirement for self build plots is specified. Policy 30 of the Joint Core Strategy also states that SUEs and other strategic developments should make specific provision towards meeting the needs of older people. Cross reference should be made to this policy

and also to the Older Persons Policies in this Plan, particularly the requirement to provide housing for older people on all sites over 50 units.

- Policy EN27: St Christopher's Drive - This site will deliver approximately 100 homes, 40% (or approximately 40 no.) of which should be affordable. It is the most suitable of the Strategic Housing sites in Oundle to deliver housing for older people and this should be a key requirement for this site rather than the general policy requirements for older person's housing on sites over 50 units, which will not result in sufficient delivery to meet the needs of older persons in the town. Part of this site (approximately one third) should be specifically allocated for Extra Care Housing for Older People with a capacity to deliver 40 – 60 apartments. The affordable housing requirement would be delivered as part of a mixed tenure scheme for older people which could provide market sale, shared ownership and affordable rented properties. Opportunities to provide a medical hub and other facilities on this site, which would be supported by an Extra Care Housing Scheme and by the wider development, should be explored.

#### **Officer response:**

**It is not considered necessary to refer to a requirement of 40% affordable housing for each of these sites as Oundle is specifically referred to in criterion d) of Policy 30 of the adopted North Northamptonshire Joint Core Strategy as having this target on private sector developments of 15 or more dwellings.**

**It is considered appropriate to expand on the wording in relation to Policy EN27, St Christopher's Drive, which currently advises the site is expected to provide a housing mix which includes provision for older persons to add that this site should be specifically allocated for Extra Care Housing as the site provides an excellent opportunity to address an identified need to deliver housing for older people in Oundle.**

**It is also considered appropriate to cross reference the proposed housing allocations for Oundle to the policy need that identifies future requirements for older person housing provision within the district.**

#### **Historic England**

- It is not possible to respond fully at this stage without more detailed assessment. Recommend that the Authority's Conservation Officer and County Archaeological Advisor should be consulted in relation to all sites.
- Policy EN26 / Figure 21: Cotterstock Road / St Peter's, Oundle - Given the close proximity to the scheduled Roman town (SM 1021454 Ashton Roman Small Town) and the river Nene, they would expect a thorough heritage assessment looking for further Roman and prehistoric remains. This might involve consideration of geomorphology which may include deposit modelling.

- Policy EN27 / Figure 22: St Christopher's Drive, Oundle - A thorough heritage assessment should be undertaken, given the proximity on the other side of the A603 of undesignated prehistoric and Romano-British cropmarks.

**Officer response:**

**No views have been received to date from the Council's Conservation Officer. These are being sought at the time of writing this report and his views will be taken into account in deciding how to proceed on this topic area.**

**The County Archaeological Advisor has provided comments which are summarised below. It is recommended that the content of each of the Policies is updated to include this advice.**

**EN25 Stoke Doyle Road**

**I would recommend that the applicants provide an evaluation of the proposed site with any application for development. The evaluation should consist of geophysical survey and trial trenching.**

**EN26 Cotterstock Road**

**I would not require evaluation pre-application or pre-determination and would consider that the archaeological potential of the site can be addressed by a suitable condition for a programme of work should consent be granted.**

**EN27 St Christopher's Drive**

**Any consent would require a condition for a programme of archaeological work and that this work would comprise an open area excavation in advance of any development in the eastern part of the site.**

**Anglian Water**

- Policy EN24 – Points out this refers to a number of material considerations which are relevant to the proposed housing allocation sites at Oundle. As part of which reference is made to flood risk and drainage as a material consideration. It is suggested that this text could be strengthened by including an explicit reference to both foul and surface water drainage and the provision of Sustainable Drainage Systems (SuDs) forming part of the design of the allocation sites. It is therefore proposed that Policy EN24 be amended as follows: Key considerations to be taken into account for each of the sites along with appropriate Local Plan policies are: 'c) the management of flood risk and foul and surface water drainage including the incorporation of SuDs as an integral part of the design of the site'. It is also suggested that a new criterion is added as follows:

the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

- Policy EN25 - We have no objection to the principle of development of this site for residential development. The adopted North Northamptonshire Core Strategy includes Policy 5 (Water Environment, Resources and Flood Risk Management) which requires applicants to demonstrate that water and wastewater infrastructure and wastewater treatment capacity is available or can be made available prior to occupation. Similarly this policy requires developments to use SUDs wherever practicable to reduce flood risk. The Part 2 Local Plan also includes a further policy (EN24 – Oundle housing allocations) which refers to the management of flood risk and drainage for housing allocation sites at Oundle. As the Local plan policies are intended to be read as a whole we do not consider that it is necessary to duplicate these requirements in this site specific policy.
- Policy EN26 - The adopted North Northamptonshire Core Strategy includes Policy 5 (Water Environment, Resources and Flood Risk Management) which requires applicants to demonstrate that water and wastewater infrastructure and wastewater treatment capacity is available or can be made available prior to occupation. Similarly this policy requires developments to use SUDs wherever practicable to reduce flood risk. The Part 2 Local Plan also includes a further policy (EN24 – Oundle housing allocations) which refers to the management of flood risk and drainage for housing allocation sites at Oundle. As the Local plan policies are intended to be read as a whole we do not consider that it is necessary to duplicate these requirements in this site specific policy.
- Policy EN26 - The proposed site is located within close proximity to Oundle Water Recycling Centre (WRC). It is approximately 95m to the boundary of the above site. This asset is critical to enable us to carry out Anglian Water's duty as sewerage undertaker. Water Recycling Centres were historically built at a distance from existing development because of odour associated with the operation of the sites. Encroachment of receptors, particularly residential development, there is a risk that odour and amenity issues could arise leading to restrictions on the continued use of Anglian Water's existing water recycling infrastructure. The wording as proposed suggests that structural landscaping on the site boundary will be sufficient to mitigate any adverse impacts from Oundle WRC. However the policy does not specify how a suitable distance will be maintained to ensure the occupiers of the site will not be adversely affected as set out above. It is therefore suggested that Policy EN26 be amended to make it clear that an odour assessment will need to be prepared for the above site and that the applicant will need to demonstrate that a suitable distance can be maintained to ensure the occupiers of the site will not be adversely affected and the on-going operation of Oundle WRC is not prejudiced.
- Policy EN26 - There is an existing foul sewer in Anglian Water's ownership located within the boundary of the allocation site and the site layout should be designed to take this account. It is therefore suggested that new supporting text is added to the Part 2 Local Plan as follows: 'There is an existing sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer should be located in highways or

public open space. If this is not possible a formal application to divert existing asset may be required.'

- Policy EN27 - Have no objection to the principle of development of this site for residential development. The adopted North Northamptonshire Core Strategy includes Policy 5 (Water Environment, Resources and Flood Risk Management) which requires applicants to demonstrate that water and wastewater infrastructure and wastewater treatment capacity is available or can be made available prior to occupation. Similarly this policy requires developments to use SUDs wherever practicable to reduce flood risk. The Part 2 Local Plan also includes a further policy (EN24 – Oundle housing allocations) which refers to the management of flood risk and drainage for housing allocation sites at Oundle. As the Local plan policies are intended to be read as a whole we do not consider that it is necessary to duplicate these requirements in this site specific policy.
- Policy EN27 - There is an existing sewage pumping station - Oundle-Ashton Gate Terminal Pumping Station (OUNASM) in Anglian Water's ownership located within the boundary of the allocation site and the site layout should be designed to take this account. It is therefore suggested that a new criterion to Policy EN27 is added as follows:  
'e) the design layout should consider the proximity of the foul pumping station and allow for a distance of 15 metres from the boundary of the curtilage of the dwellings to reduce the risk of nuisance/loss of amenity associated with the operation of the pumping station'.

#### **Officer response:**

**Amend criterion c of Policy EN24 to read '*The management of flood risk and foul and surface water drainage including the incorporation of SuDs as an integral part of the design of the site*'.**

**Also, add a new criterion as follows: '*The safeguarding of suitable access for the maintenance of foul drainage infrastructure*'.**

**Add an additional criterion to Policy EN26 reading '*An odour assessment will be required to protect the future occupants of the site and the on-going operation of Oundle Water Recycling Centre*'.**

**In addition, criterion c) of EN26 should be amended to delete the wording '*to mitigate the impacts of smell and other pollution (e.g. from the sewage works to the north)*' and replace it with '*to mitigate any potential adverse impact of the development*' to reflect the fact that the landscaping alone may not be sufficient to mitigate against odour and also that it may offer other benefits.**

**A further criterion should be added to Policy EN26 reading '*There is an existing sewer within the boundary of the site, and the design layout should be designed to take this into account*'**

Finally, a new criterion to Policy EN27 be added as follows:  
*'e) the design layout should take into account consider the proximity of the foul pumping station adjacent to the site'.*

#### **North Northants Joint Planning and Delivery Unit**

- **Policies EN23 to EN28** - Should there be more local direction on affordable housing?

#### **Officer response:**

**No further changes are considered justified as a requirement of 40% affordable housing in Oundle is specifically referred to in criterion d) of Policy 30 of the adopted North Northamptonshire Joint Core Strategy on private sector developments of 15 or more dwellings. Pre-application discussions in relation to each of the sites can agree the precise detail.**

#### **ENC Development Management**

- Policy EN24 - Suggested change: Add new criterion re preparation of a masterplan to accompany outline applications for the three sites.
- What will happen with saved (RNOTP) allocations? Support bringing forward in EN24?
- EN25 – EN27- Structural landscaping criteria - need to strengthen policy wording?  
Suggested change:  
Amend policies: "Appropriate mitigation measures, including structural landscaping, will be provided to..."
- EN25, EN26 and EN27 - Proposed Oundle Cemetery extension – Needs costings/ evidence base.
- EN26 - Criterion c - Question whether that would mitigate smell/pollution - refer to Environmental Protection Team. Also need to consider noise.

#### **Officer response:**

**An additional criterion should be added to Policy EN24 specifying that a detailed design brief will be necessary to accompany any outline applications on the three sites. A masterplan is not considered appropriate given the scale of the sites proposed.**

**In response to the query about what will happen to any undeveloped Rural North, Oundle and Thrapston Plan housing allocations, these may come forward as 'windfall' sites and do not need to be set out as specific allocations in the Local Plan.**

**Amend criterion d) of Policy EN25 and criteria c) of Policies EN26 and EN27 to add "*Appropriate mitigation measures, including structural landscaping, will be provided to...*" This reflects the fact that other measures to mitigate impact, in addition to structural landscaping, may be appropriate for these sites.**

**Oundle Town Council has stated that there is no requirement for additional sites in Oundle to provide a financial contribution towards the cemetery extension.**

**Finally, in relation to the sewage works (Oundle Water Recycling Centre), the additional criterion for Policy EN26 is responded to under the officer response made in relation to the Anglian Water representation. However, it is accepted that noise can also be an issue with treatment works. Accordingly, it is considered appropriate to add the wording '*...including impacts from noise...*' to the criterion.**

#### **Persimmon Homes – Policies EN24 and EN27**

- The housing figures quoted for Oundle include two allocations in the Rural North, Oundle, and Thrapston Plan (2011) for which no planning permissions or planning applications exist. They consider, given the amount of time that has lapsed with no planning application having been submitted, the deliverability of these existing allocations is extremely questionable. Therefore, they are of the view that it is not appropriate to count these sites towards the residual housing requirement and deliverable alternatives must be brought forward. Even if this were not the case allocating sufficient land only to meet the base requirement in the NNJCS would provide insufficient flexibility and jeopardise the delivery of the plan's strategy, which involves bringing forward new housing to reinforce Oundle's role as a rural service centre. The scale of allocations brought forward in Oundle through Policy EN24 provides an appropriate buffer to account for uncertainty and to ensure future flexibility. This is a sound approach given that the numbers articulated in the NNJCS are expressed as a minimum and the National Planning Policy Framework's stated intention to "significantly boost" the supply of new homes. The uncertainties created by local government reform in Northamptonshire and around the timescales for a review of the NNJCS further reinforce the need for some flexibility here. They consider Policy EN24 in terms of the overall scale of housing sites allocated in Oundle is sound and consistent with the NNJCS and therefore they support.
- Consider Policy EN27 in general terms is sound and therefore they support it. Points out that a previous refusal on this site was solely on the grounds that the Council had a 5 year housing supply and there was no material harm arising from the proposal and it did not raise any concerns in respect of on or off-site constraints or adverse impacts. They have commissioned various areas of work which show the site is readily deliverable for residential development.
- More evidence is required to justify the Policy requirement for older person's accommodation and 5% of dwellings provided as serviced self-build plots. Also, request that self and custom build properties are given equal status legislation.
- Note that Policy EN27 requires a contribution towards the proposed extension of Oundle Cemetery. Whilst they consider this aspect of the policy is not unsound as a matter of general principle, further work is needed to elaborate on how this item of

infrastructure will be delivered and the broad scale and nature of the contribution required.

- In relation to access arrangements for site EN27, they consider appropriate mitigation can be put in place to allow for a satisfactory access arrangements to and from the site. It is considered that the precise solution can be agreed through the planning application process and that this does not constitute a barrier to the deliverability of the site.

**Officer response:**

**No further action is necessary in response to this representation as it is generally in support of Policy EN27.**

**Glaphorn Parish Council – Policy EN26**

- Considers that, whilst the allocation of this site is no great surprise, the proposed scale of development is significantly more than expected. They object to the inclusion of the part of the site which lies within the Parish of Glaphorn.
- Asks how is it intended to provide connection to the Rights of Way network to give access to Glaphorn?
- Asks why should the developer contribution to an extension of Oundle Cemetery be singled out? A wider evaluation of the implications for Glaphorn Parish should be made e.g. traffic generation.

**Officer response:**

**The proposed site comprises one large field. The parish boundary for Glaphorn is located through the centre of the site and there are no distinguishing features on the ground to define this. The parish boundary does not follow a logical boundary by which to define the extent of the site.**

**Criterion b) of policy EN27 specifies that connections will be provided to the adjacent Rights of Way network including access to nearby villages such as Glaphorn. The detail of how this is achieved would be a matter for consideration in connection with any subsequent planning application.**

**Oundle Town Council has advised that there is no longer a requirement to seek a financial contribution from the developers of other site proposals in Oundle to assist the extension of Oundle Cemetery. Notwithstanding this, all developments have to secure the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from development in line with Policy 10 of the Joint Core strategy. Accordingly, it is not necessary to repeat this in Policy EN27.**

## **Oundle Town Council including the Neighbourhood Planning Group.**

- Objects to the approach with just three suggested sites within and considers the ones allocated in the Neighbourhood Plan are more appropriate.
- Paragraph 8.23. Notes the statement that approximately 300 new houses are required and considers this contradicts Paragraph 8.12 which sets a minimum of 242, and messages set out at a public meeting to discuss the Neighbourhood Plan where ENDC planners were clear that the 312 houses provided in the draft Neighbourhood Plan was too many.
- Considers Policy EN24 appears to completely ignore work done to prepare the Consultation Draft Neighbourhood Plan for Oundle. This fully meets the “approximately 300” required in Paragraph 8.32 following discussion with the developers over a long period of time and in response to stated community preferences. The sites included in EN24 all have more houses than already agreed.
- The benefits sought for the 3 sites proposed in the Local Plan include contributions to the cemetery extension and connections to the existing Public Rights of Way network and landscaping to mitigate noise and smells that would be required to ensure the new houses are attractive to new residents from both market and social housing populations. These seem significantly poorer overall contributions from c.300 new dwellings than the Neighbourhood Plan has secured in principle from development partners. The Neighbourhood Plan includes contributions to wider public benefits including, a corridor to create a footpath rerouting UF6 as part of the Oundle Circular Route. 4ha for recreational or sports use which can also be used by Prince William School, creating an access which does not conflict with the school exit, upgrading path UF7 and create a new link to UF6 as part of the Oundle Circular Route, providing 0.55ha for allotments with water and an on-site parking area with public open recreational space with access for vehicles cyclists and pedestrians, providing a 0.5ha extension to the cemetery, upgrading path UF3 as part of the Oundle Circular Route, providing c.5.5ha with separate access to enable its use for community events and festivals etc, upgrading path UF10 and creating a new footpath to facilitate a link to path UF11 as part of the Oundle Circular Route and creating a footpath from Cotterstock Road to path UF1 as part of the Oundle Circular Route.
- Considers the Council has chosen the two sites (EN26 and EN27) with low contributions to the wider public benefit of the sort that will maintain the character and quality of life in Oundle.
- The housing allocations for Oundle make no reference to windfall sites. They consider this is contrary to the requirements of NPPF 2018 which requires local plans to have a mix of sites for housing in case the larger sites are delayed. Paragraph 68 of NPPF specifically makes the point that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. It states that to promote the development of a good mix of sites, local planning authorities should use tools to bring forward small and medium sites.
- There is ample land suitable for development around Oundle, it is a question of location, we do not need to develop all of the land. More, because of the poor road infrastructure of this old town, it is important the developments share the traffic burden, rather than concentrate it.

- It is recognised in all reports that Oundle does not need more housing to support local employment. Much of the expansion will be for commuters, which means a significant increase in morning and evening traffic leaving and entering the town.
- Further, in the feed back to the Oundle Neighbourhood Plan, Cotterstock Road and St Christopher's Drive had the most concerns raised regarding environmental and road infrastructure issues.
- A key part of the Oundle Neighbourhood plan is the provision of public green space, a festival field, cricket pitch and allotments. All of this is excluded by the adoption of the ENC Local Plan, unless we accept more houses over the 300 target.
- Oundle stands to have over 500 houses imposed upon it by 2031. This will occur because various sites not included in the local plan will inevitably bring forward development proposals, which ENC will not be able to deny.
- Oundle has the opportunity to expand as a specialist centre of educational excellence. The site of Prince William school is well placed for expansion into specialist further education. Adjacent land will provide adequate car parking and facility expansion opportunities. This expansion will be curtailed if the land is used for domestic housing.
- There are specific concerns about the site in Cotterstock Road subject to Policy EN26. This site is identified in the Neighbourhood Plan as having potential for 35 houses and they consider, at the 130 houses proposed in the Local Plan, it becomes unmanageable. There are concerns on the grounds of highway safety and traffic grounds, the impact of development on this site in the surrounding landscape, flood risk and drainage, heritage asset Impact and the proximity of the site to the existing water treatment facility. They also add many of the properties in St Peter's Road bordering the site have acquired rights to use that part of the existing field bordering their property for, amongst other things, cultivation and garden waste disposal. They also exercise as of right a pedestrian access along the field edge to the public footpath between Oundle and Cotterstock. They therefore consider any development should take account of this ensuring continued access to the public footpath from the rear of the properties in St Peter's Road which border the site. Finally, they are concerned about the site resulting in coalescence between Oundle and Glapthorn and they point out that part of the site is located in Glapthorn but is not allocated for residential development in that village's adopted neighbourhood plan.
- There are also concerns about the 100 houses the site in St Christopher's Drive subject to Policy EN27 becomes unmanageable. There are concerns on the grounds of highway safety and traffic, surface and foul water drainage plus noise due to the proximity of the A605 bypass.
- There are also various views about the Stoke Doyle Road site subject to Policy EN25. All traffic wanting to enter Oundle or wishing to access the A605 or A427 would need to use the bridge at Warren Bridge and there would need to be road improvements undertaken here which should be paid for by the site developer. They also point out that whilst the landscape impact will be more than at St Christopher's Drive but considerably less than Cotterstock Road it will nevertheless be extremely important not to adversely affect the cemetery. In addition, development should be restricted to ensure that flooding of the brook does not affect any new residential properties. Furthermore, the drainage of the development must ensure that it does not lead to any flood risk from the brook, which might affect existing properties

bordering the brook. Finally, the development will need to be undertaken sympathetically and screened so as to minimise the impact upon the cemetery, cemetery chapel and cemetery lodge. The houses should be sited so far as possible to lessen any noise pollution affecting the cemetery and they agree that the developer of this site should be required to provide land for a cemetery extension by gifting the land to the town council.

- One particular need has been identified by the town council and met in the draft neighbourhood plan is the provision of allotments. This is achieved with the inclusion in their plan of a residential development on Miller's Field off Benefield Road which currently has some private allotment provision. They note the district council feels that any development on this site should be dealt with as windfall rather than being allocated. They believe that in order to ensure that the allotment provision is secured that this site should be allocated as provided for in the draft Oundle neighbourhood plan. Alternatively, the provision of allotment space should be considered as a requirement for at least one if not all sites allocated for residential development in the draft plan under consultation.

**Officer response:**

**The council has evidence to justify the three sites that are proposed in the Local Plan and is not aware of any in principle technical objections to their development. For detailed requirements, such as highways and drainage, this will be provided in connection with any planning applications. Section 106 contributions will be sought where justified towards facilities and infrastructure in the area.**

**It is anticipated that windfall sites will come forward alongside the three allocated ones.**

**Overall it is considered, that the proposed site allocations contained in the draft Local Plan provide a more sustainable, deliverable approach in line with both emerging and extant policy.**

**Related to this, whilst it is accepted that there may be some points in favour of the proposed Benefield Road housing site in the Neighbourhood Plan, it is to be separated from the A427 by the proposed community area (festival site) for the town. It will also have open space to one side and agricultural land to the other and only join to existing housing along a small part of the Northern boundary. It therefore does not integrate well with the existing built development of the town and does not appear to provide an effective use of land as required by the NPPF.**

**Any difference in the numbers quoted for the housing area reflection that the housing targets are expressed as a minimum.**

**Finally, in response to concerns about coalescence with Glapthorn from the Cotterstock Road allocation, the proposed development would be located over 1km from Glapthorn.**

## Transition Oundle

- Considers the draft plan has ignored the following aspirations of the local community through work on their neighbourhood Plan: 1. The compact nature of the town should be maintained by ensuring that new housing development only takes place within 1 mile of the centre. 2. New housing should be distributed across a large number (currently seven) of sites and not concentrated in a small number of large sites. 3. Each development should include benefits to the community of Oundle beyond the simple provision of housing (cemetery extension, allotments, sporting/recreational space etc). Related to this, the proposal that all of the additional housing is allocated to only three sites is wrong.
- Is concerned that the concentration of housing on the sites has been increased in the Draft Plan (beyond that contained in the draft Neighbourhood Plan) and two of the sites are subject to local environmental issues (noise, smell and pollution).
- They also consider adding large concentrations of low grade housing to the town will make it difficult for them to be assimilated.
- There are concerns that two of the sites are located near school premises. Placing large new housing developments near school premises will disadvantage child safety and exacerbate the inconvenience caused to residents when pupils arrive or leave.
- One of the proposed sites is near to access roads for the town's two supermarkets and the additional traffic from that the site will add to the current levels of congestion.
- 50% of the land in the Cotterstock Road proposal falls in the parish of Glapthorn (Policy EN26). It should be noted that the Glapthorn Neighbourhood Plan was approved by referendum in July 2018 and adopted by East Northamptonshire Council. This Plan specifically considered outlier developments that are within Glapthorn parish and adjacent to the Oundle parish boundary should not normally be granted.
- If a large development site is required, then the land north of Benefield Road should be used since this can also be used to link to the west and north of the town with paths and cycleways, which is especially important for children attending the primary school.
- If the sites are subject to local environmental issues then the development should incorporate copious areas of green space and landscaping. If this means that the housing concentrations are lowered, then the development should include higher value housing options as identified in para 8.47 of the Draft Plan. This would have the added benefit of avoiding large developments near school premises and so reduce the impact on child safety and inconvenience to residents when pupils arrive or leave.
- If, despite the existence of an approved Glapthorn Neighbourhood Plan an outlier development is approved, then the developer contributions (S106 or CIL) should flow to the impacted parish (Oundle) and not to the windfall parish (Glapthorn).

### Officer response:

**It should be noted that there is reference made, in this objection, to the approach in the Oundle Neighbourhood Plan comprising 7 sites. This has been reduced to 5 sites in the Regulation 16 Neighbourhood Plan.**

**The council has evidence to justify the three sites that are proposed in the Local Plan and is not aware of any in principle technical objections to their development. For detailed requirements, such as highways and drainage, this will be provided in connection with any planning applications. Section 106 contributions will be sought where justified towards facilities and infrastructure in the area.**

**There is no specific evidence presented that identifies sites being promoted via the Neighbourhood Plan to be significantly more sustainable than those sites proposed in the Local Plan.**

**Related to this, whilst it is accepted that there may be some points in favour of the proposed Benefield Road housing site in the Neighbourhood Plan, it is to be separated from the A427 by the proposed community area (festival site) for the town. It will also have open space to one side and agricultural land to the other and only join to existing housing along a small part of the Northern boundary. It therefore does not integrate well with the existing built development of the town and does not appear to provide an effective use of land as required by the NPPF.**

**The proposed Cotterstock Road site comprises one large field. The parish boundary for Glapthorn is located through the centre of the site and there are no distinguishing features on the ground to define this. The parish boundary does not follow a logical boundary by which to define the extent of the site.**

**Finally, any Section 106 contributions will be directed towards where they are needed rather than specifically to the Town or adjacent Parish.**

### **Biggin and Benefield Estate**

- In relation to housing in Oundle, the Draft Local Plan proposals cut across and fundamentally undermine the preparation of the Oundle Neighbourhood Plan. Given the advanced stage of preparation of the Oundle Neighbourhood Plan and the clear evidence of community support for the Plan and the Plan making process, future housing allocations for Oundle should be determined via the Neighbourhood Plan based upon the housing requirement figure for the town set out in the Local Plan.
- The Estate wishes to promote a site at Benefield Road (North) as an appropriate location for housing development and one that ranks more highly than the sites proposed for allocation in the Plan, when assessed against a previously utilised range of site assessment criteria. They add this site is capable of subdivision into smaller site elements, whilst offering the long term potential for a comprehensively planned extension to the town. In addition, they advise this site is capable of delivering a community open space area, termed in some documents as a festival site. This is one of the priorities of the Neighbourhood Plan.
- Finally, they also point to a number of issues with the 3 sites being promoted for housing in the Local Plan. Examples of these are as follows: In relation to the Stoke Doyle Road site, they consider the main issue is a constrained access part of which falls within Flood Zone 3. They also consider this site is poorly served by public transport. In relation to the Cotterstock Road site, they point out part is in Glapthorn Parish and development of this part of the site is not supported by the

Glaphorn Neighbourhood Plan. They also point out development of this site will also result in coalescence between Oundle and Glaphorn. In relation to the St Christopher's Drive site, there is a constrained access and poor links to public transport.

**Officer response:**

**The council has evidence to justify the three sites that are proposed in the Local Plan and is not aware of any in principle technical objections to their development. For detailed requirements, such as highways and drainage, this will be provided in connection with any planning applications. Section 106 contributions will be sought where justified towards facilities and infrastructure in the area**

**There is no specific evidence presented that identifies sites being promoted via the Neighbourhood Plan to be significantly more sustainable than those sites proposed in the Local Plan.**

**Related to this, whilst it is accepted that there may be some points in favour of the proposed Benefield Road housing site in the Neighbourhood Plan, it is to be separated from the A427 by the proposed community area (festival site) for the town. It will also have open space to one side and agricultural land to the other and only join to existing housing along a small part of the Northern boundary. It therefore does not integrate well with the existing built development of the town and does not appear to provide an effective use of land as required by the NPPF.**

**Finally, in response to concerns about coalescence with Glaphorn from the Cotterstock Road allocation, the proposed development would be located over 1km from Glaphorn.**