



## **Response to the Great Addington Neighbourhood Plan – Regulation 16 (Submission Draft September 2024) Consultation Dec-Feb 2025**

**On behalf of Mr & Mrs M Bowness and Mr R Hammond (Hammond Interiors Ltd) submitted by Roebuck Land and Planning Ltd**

On behalf of our clients, we welcome this opportunity to comment on the Regulation 16 version of the Great Addington Neighbourhood Plan (GANP).

Roebuck Land and Planning has been engaged by Mr and Mrs M Bowness and Mr R Hammond (Hammond Interiors Ltd) to promote their land interests in Great Addington. Our clients own the former bus depot on Cranford Road. This previously developed land offers an opportunity to provide much needed homes in a sustainable location.

We feel that the Plan could be improved in certain areas which are outlined below. The relatively small changes could help the plan become more robust and ultimately help it stand the test of time. We consider these changes should be made prior to the Neighbourhood Plan going to referendum. In addition, there is a great need for further research and justification for some important elements of the plan.

In its current form, we believe that it fails to meet the **basic conditions a and d** as required by Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). In particular, following the national planning policy changes in December 2024 the plan should be reviewed to check whether it meets basic condition a) which states that the Neighbourhood Plan has to have regard to national policies and advice contained in guidance issued by the Secretary of State.

### **Basic Condition d – Contributes to sustainable development**

The GANP fails to meet Basic Condition d. as it fails to contribute to the achievement of sustainable development. A qualifying body must demonstrate how a neighbourhood plan contributes to the achievement of sustainable development. The National Planning Policy Framework identifies the three dimensions to sustainable development:

Social – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built

environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;

Environmental – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Economic – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

The GANP does not adequately plan for the supply of housing required to meet the needs of the present and future generations and it does not demonstrate how it will improve the economic growth of the village.

**Basic Condition e - Is in general conformity with the strategic policy of the development plan for the area**

The North Northamptonshire Local Plan is being updated. These policy changes run the risk of quickly superseding the policies within the GANP if there is not sufficient flexibility within the GANP policies to accommodate higher order planning policy changes. If this is the case, the Neighbourhood Plan would also fail to meet Basic Condition e.

Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers their area. Paragraph 30 of the 2023 NPPF states that: *“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.”* This paragraph is now 31 in the 2024 NPPF. Therefore, without any in-built flexibility or commitment to a review following significant national or local planning policy changes, the Neighbourhood Plan could be superseded by the newer planning policies in a relatively short time period.

This is further underlined in the NPPG guidance which states: *“Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.”* (Paragraph: 009 Reference ID: 41-009-20190509).

**Presumption in Favour of Sustainable Development:**

The fundamental principle of the National Planning Policy Framework is the presumption in favour of sustainable development. Paragraph 32 of the NPPF states, for plan-makers that all policies should be underpinned by relevant and up to date evidence. The GANP fails to positively plan for development during the whole neighbourhood plan period and does not provide any flexibility for change as the North Northamptonshire Plan evolves.

Many of the policies within the GANP focus mainly on limiting or restricting development and keeping the areas beyond the built-up area open and free from development.

There is no clear evidence of housing need or assessment of future growth requirements for the villages other than agreement to an indicative figure provided by NNC on the 4<sup>th</sup> January 2023 which does not appear to be underpinned by any up-to-date work including evidence of local housing need. The conclusion to support allocations for 11-20 dwellings to 2041 is not properly evidenced.

The submitted evidence base does not include a local housing needs survey to inform the scale of growth to 2041; nor is there any reference to the district-wide growth agenda going forward when setting the indicative figure.

It is important that the plan is prepared positively to support development, that it does not seek to hinder or thwart strategic development objectives in the local planning authority area, but adds an additional layer of local detail to policies in the local plan and/or has locally distinctive policies relevant to the neighbourhood plan area. The East Northamptonshire Local Plan Part 2 empowers smaller villages, such as Great Addington, to dictate where they wish to see development within their communities and whilst we acknowledge the GANP has recognised the opportunity to provide approximately 11 to 20 dwellings, given the plan period is 20 years, this represents an increase of only between 0.55 and 1 dwelling per year. The Neighbourhood Plan states that there are currently 299 residents living in 125 households, as such, even at the highest level of predicted growth, there would only be a 16% increase in the size of Great Addington after 20 years.

Within the minutes of the Neighbourhood Plan Steering Group meeting held on the 4<sup>th</sup> January 2023 it is stated that North Northants Council said that the village should accommodate between 11-20 dwellings within the next 5 years. No allowances are made for any future development beyond this five-year period. The GANP does not properly plan for housing requirements for the chosen 20-year plan period.

**Proposed Change: Clear and robust evidence should be provided for the current housing need and allowances made for future housing provision over the entirety of the plan period.**

**Or, the GANP policy should acknowledge that the proposed housing growth only covers the first 5 years of the plan.**

#### **Plan Period:**

The GANP covers the period 2021 – 2041, which is 20 years, three of which have already passed. This is considered an appropriate time period which will align with the North Northamptonshire Local Plan review that will be extended to cover the period to 2041. Notwithstanding this, it is important that review dates are incorporated within the Neighbourhood Plan. It is recommended that a review is undertaken after the North Northamptonshire Local Plan review and following any significant national or local planning policy amendments as well as at regular intervals of 5 years to ensure it continues to meet the legal requirements within the general conditions as well as meeting the changing needs of the community.

**Proposed Change: The GANP should include a policy which seeks to review and where necessary update the Neighbourhood Plan following any planning policy changes and at regular intervals of 5 years to ensure that it continues to meet the current and emerging needs of the local residents.**

**This could include reserve sites or a policy dealing with development proposals beyond the built-up boundary to include exception sites and land identified for development in emerging local or national planning policy.**

**Alternatively, the GANP could clearly state that the level of housing growth is not a ceiling. It could include a general policy for directing growth beyond the 5 years growth currently being planned for.**

Policy GA16 is titled 'infill' and relates specifically to sites within the settlement boundary. The explanatory text highlights the lack of infill opportunities within the tightly drawn settlement boundary and at 9.11, it states that no infill sites were promoted through the call for sites and opportunities are likely to be very limited. There is also conflict with the supporting text within paragraph 9.12 which refers to 'beyond settlement boundaries'. Policy GA16 should be widened out to apply to the consideration of sites beyond the settlement boundaries aswell. For example, our client's site is brownfield land – former bus station site – and is located beyond the settlement boundary.

## **Chapter 4: Traffic and Transport**

This chapter provides a good background to the issues in relation to speeding and traffic volume through the village but fails to identify any specific measures that would help solve the issues. Additional, planned development would be able to direct much needed resources into traffic calming measures. Residents should be given the option of additional development in return for meaningful and effective traffic calming measures.

Our clients consider that the redevelopment of the old bus station site would help provide such measures, in the form of 'soft measures' such as a more 'village' feel at this important approach to the village as well as 'hard measures' such as vertical speed control elements for example, speed bumps or chicanes.

Traffic issues were identified as the most important factor for local residents and it is therefore a missed opportunity not to address it or present measures to help reduce traffic speeds.

## **Chapter 5: The Countryside**

We very much welcome paragraph 5.2 which seeks the re-use of rural buildings however this is not reflected in the policies. As a rural village, encouraging and facilitating agriculture and other rural businesses is vital to the community and provides much needed jobs for a variety of skill sets. However, this needs to be further promoted through policies within the GANP.

**Policy GA2 ‘The Countryside’** is a restrictive policy which should be amended to recognise the important role that certain types of development can play in the community and to enhance the intrinsic character of the countryside. **Proposed Change: The inclusion of development to promote rural businesses and re-use previously developed land should be included within policy GA2.**

**Policy GA3: ‘Locally Important Views’** is also a restrictive policy. Several views have been identified around the built-up area as being of importance. At present this section does not meet the basic condition a. given its lack of clarity and precision as required by NPPF paragraph 16.

Appendix 1: Locally Important Views provides slightly more details on the selected views. This section requires further clarity and should include an assessment of the value each ‘locally important view’ provides, and further information should be given on the evidence and justification for each view. **Proposed Change: Further assessment and justification of the locally important views.**

**Policy GA6 ‘Ecology and Biodiversity’** does not go as far as Policy 4 of the NNJCS. Under recent legislative changes, most developments are required to provide a Biodiversity Net Gain (BNG), which is reflected in Policy GA6, however the wording as currently shown would imply that an ecological survey is only required within the Nene Valley Nature Improvement Area, this is not the case and the wording should be amended to ensure that ecological surveys are provided when the specific criteria are met. Ecological surveys should be provided when it is suitable to do so based on the nature and scale of the proposed development or if it is reasonable to think it will be a material consideration in the determination of the application as set out in the statutory tests contained within Section 62(4A) of the Town and Country Planning Act 1990 and article 11(3)(c) of the Town and Country Planning (Development Management Procedure) (England) (Order) 2015. **Proposed Change: Policy GA6 should be amended to state that ecological surveys will be required if development could have a significant impact on the biodiversity or the ecology of the area and should be proportionate to the size of the proposed development.**

## **Chapter 6: Heritage and Design**

The Great Addington Design Guide has effectively been brought into policy through **GANP Policy GA10 ‘Design’**. Policy GA10 in itself is rather vague and provides little details on the key design features of the village and the areas where enhancement would be beneficial. The Design Guide provides a useful addition to the Neighbourhood Plan and does not appear overly onerous. It will provide a useful starting point for architects and designers who are seeking development within the village. Notwithstanding this, each development should be judged on its own merits and the individual nuances of each site should be carefully considered. It is our understanding that the Design Guide seeks to provide more information and is a starting point rather than a policy document based on robust evidence. For the avoidance of doubt, we consider that it would be appropriate to state this within Policy GA10, this could be done by rewording the policy and making it more positive in its stance for good design, for example:

**GA10 Proposed Wording:** *“Developments that facilitate the creation of high quality, beautiful and sustainable buildings and places will be supported. Guidance on the parishes expectations on design are contained within The Great Addington Design Guide.”*

## Chapter 7: Local Green Space

**Policy GA11 ‘Local Green Space’** is another example of a restrictive policy. There is a missed opportunity to enhance the Addington’s Playing Field should the opportunity arise in the future. In its current form this policy seeks to stop any form of development on the playing field. In the future it could be beneficial to add additional facilities such as additional parking facilities, play equipment, club houses etc, and as such the following amended wording is suggested:

**GA11 Proposed Wording: ‘The Addingtons Playing field, identified on Map 10, will be protected for recreational purposes and enhanced where possible and appropriate to do so’.**

In its current form, policy GA11 directly conflicts with Policy GA13 which states that diversification and improvements are supported on the Addingtons Playing Field. Arguably Policy GA11 could be combined with GA13, particularly if all of the community services and facilities were marked on a plan. This would enhance Policy GA13, remove the potential conflict between the two policies and make the GANP more concise. **Proposed Change: Combine Policies GA11 and GA13 and include a plan which clearly identifies all of the identified community facilities and their boundaries.**

## Chapter 8: Services and Facilities

**Policy GA14** is welcomed and clearly demonstrates the areas that require funding within the village and will enable resources to be directed towards the areas that are most needed. Based on the survey results, and the themes running through both the comments and the GANP, it is suggested that speed reduction measures are also included within the list of potential areas for financial contributions. **Proposed Change: Include speed reduction measures within policy GA14.**

## Chapter 9: Housing

**Policy GA15: Housing Requirement:** There is no actual evidence put forward by the parish or district council to underpin this indicative figure of 11-20 homes. It is clear that at some point North Northants Council has confirmed that the village requires 11-20 dwellings in a five-year period, however this appears to have been in January 2023, meaning that 18 months of the five years have already passed. If the intention is 11 – 20 dwellings every 5 years, then this could require some 44-80 dwellings. We are unable to see the robust evidence that backs up the figure of 11-20 and are unable to identify which existing commitments/permited dwellings are assumed within this figure and how it works with the proposed allocation for 16 units.

Evidence and justification should be provided for the actual level of housing required in addition to the level of affordable housing required. This should be seen as a minimum level to meet the needs of the village at the moment, with future growth or infrastructure delivery then considered and the housing requirements adapted accordingly. Similarly, the justification for starter homes and housing mix needs to be clearly presented.

If the figure of 11-20 dwellings only covers the five year period, then the GANP fails to meet one of the core objectives which is to meet the local housing needs for the plan period. Without the clear and robust evidence backing up the housing requirement, we are unable to know if the housing need is being met.

The PPG is clear that proportionate, robust evidence should support the choices made and the approach taken. Where neighbourhood plans contain policies relevant to housing supply, these policies should take account of the latest and up-to-date evidence of housing need.

There is currently insufficient evidence to underpin the scale of housing growth being considered. This should be provided to enable the proposed level to be properly examined.

Furthermore, flexibility should be built into the plan to enable the GANP to be relevant during its plan period to the emerging Strategic Local Plan changes.

In terms of the Housing Supply, we feel that there has been a missed opportunity for the inclusion of redevelopment of Brownfield Land / Previously Developed Land (PDL). Such sites offer a sustainable form of development and are encouraged through national planning policy. An additional policy should be included within the GANP which seeks to reuse PDL and help provide much needed housing. Such sites should be considered prior to the development of greenfield sites.

Proposed wording for an additional policy: ***“Policy XX: Previously Developed Land: Developments proposed on previously developed sites will be supported where they meet the identified housing needs of the village.”***

### **General Considerations:**

There are a number of policies which simply refer to local planning policy and do not provide any further guidance or discussion on how they should be applied within Great Addington, in particular policies: **GA1: ‘Parking Standards’** and **GA5 ‘Upper Nene Valley Gravel Pits Special Protection Area Mitigation Strategy’**, simply reiterate Local Planning Policies. It is a matter of planning law that guidance at a higher policy level, including national and local planning policy documents, are read as part of suite of planning policy documents and therefore the inclusion of such policies is unnecessary and detracts from the core message that the GANP is trying to convey.

**February 2025**

**Roebuck Land and Planning Ltd**