

PLANNING APPLICATION

FOR

PROPOSED RESIDENTIAL DEVELOPMENT

BRICK KILN ROAD RAUNDS

CONSTRUCTION OF UP TO 86 RESIDENTIAL DWELLINGS (INCLUDING 27 AFFORDABLE UNITS)



Introduction

1. The Planning Statement has been produced by Alan Brown Development Services Ltd on behalf of the applicants, Mr and Mrs Smith (**the applicants**) in order to provide supporting information for an outline planning application to North Northamptonshire Council (East Northants Area) acting as Local Planning Authority (**LPA**) for the proposed construction of up to 86 residential dwellings including 27 affordable units on land located north of Brick Kiln Road. The application leaves all matters reserved for future consideration with the exception of site access but provides illustrative material showing how the site could deliver the amount of residential development along with external works, public open space and biodiversity enhancements.
2. The assessment of this application will be assessed against the development plan which in this instance includes the North Northamptonshire Joint Core Strategy 2011-2031, the Raunds Neighbourhood Plan and the emerging (expected soon to be adopted) East Northamptonshire Part 2 Local Plan. The September 2023 National Planning Policy Framework (NPPF) also forms a material planning consideration.
3. The Planning Statement should be read alongside the submitted Design and Access Statement which discusses policy issues in respect of design and highways movements. The full list of application documents are scheduled below.

DRAWINGS

- BRI477-TO1 Rev D Topographical Survey
- S/NR/23/001 Rev B Illustrative Proposed Block Plan
- S/NR/23/002 Rev A Illustrative Site Plan (Sheet 1 of 3)
- S/NR/23/003 Rev A Illustrative Site Plan (Sheet 2 of 3)
- S/NR/23/004 Illustrative Site Plan (Sheet 3 of 3)
- S/NR/23/005 Site Location Plan

SUPPORTING DOCUMENTS

- Design and Access Statement
- Phase 1 Geo-Environmental Report
- Transport Statement
- Framework Residential Travel Plan
- Drainage Strategy / flood risk assessment
- Phase 1 Ecological Preliminary Assessment (PEA)
- Landscape Visual Impact Assessment
- Landscape Strategy
- Biodiversity Net Gain Calculation
- Noise assessment
- Geophysical Survey
- Archaeological Written Scheme of Investigation (WSI)
- Archaeological Investigation Report
- S106 Draft Heads of Terms

- Sustainability Assessment

National Planning Policy Framework 2023

4. The most recent incarnation of National Planning Policy Framework (NPPF) was introduced in September 2023. Paragraph 2 of the document sets out that Planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions.
5. Sustainable development is defined within Section 2 of the new NPPF. Specifically, it states

“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

The proposal seeks to provide new residential development including the provision of affordable housing on a relatively small section of agricultural land on the northern edge of Raunds. The land area owned by the applicant extends to circa 4.3 hectares which in modern farming terms is a small land holding. The land immediately adjoins major residential development to the west and should planning permission be granted will immediately abut employment development to the east. It would therefore represent a logical infill to the northern edge of the Raunds settlement. Granting permission would not compromise the ability of future generations to meet their own needs and therefore the application, ‘as a very high level’ meets the objectives of sustainable development set out in Section 2 of NPPF.

6. Paragraph 8 of NPPF sets out three overarching objectives for achieving sustainable development, which are interdependent and need to be pursued in mutually supportive ways. They are set out below.

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The September 2023 version of paragraph 8 adds *“so that opportunities can be taken to secure net gains across each of the different objectives.”* The proposal would achieve these objectives. The proposed development is located on a pocket of open land surrounded by residential and employment uses. The Raunds and Stanwick Inset Map contained within the emerging Part 2

Local Plan does not provide a settlement boundary and equally does not show the extent of expansion in Raunds north of Brick Kiln Road in recent years (most notably Northdale Park). We would contend that the development is not located in open countryside but recognise that the LPA may formulate a different view. We contend that the application site is the right location for residential uses. However, whether the proposal is considered to be the “right type” and in the “right place” is a matter for the decision maker to determine but we contend that the objectives of paragraph 8a) are met. Paragraph 8b)’s main thrust appears to be directed towards creating healthy communities by providing the correct range of design of housing. The application is submitted in outline form leaving all design matters reserved for subsequent approval thus ensuring that the correct range of housing can be provided in negotiation with the LPA and ensuring that the objectives of 8b) are met. The development would provide a high quality, energy efficient and low environmental impact development. The scheme provides for significant biodiversity improvements over an area of in excess of 1.4 hectares. Overall, the tests in paragraph 8 are met.

7. Paragraph 11 sets out the presumption in favour of sustainable development. For decision making and requires that applications are assessed as follows
- *approving development proposals that accord with an up-to-date development plan without delay; or*
 - *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Whether a local Plan is considered up to date or not is assessed within paragraph 219 which states:-

“However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).”

8. Paragraph 38 of NPPF requires that Local Authorities should approach decisions “to development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”
9. Section 5 of NPPF sets out a vision for the delivery of a sufficient supply of homes. Specifically paragraph 69 states:-
- “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. To promote the development of a good mix of sites local planning authorities should:”*

Paragraph 69 c) goes on to state:-

“support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;”

Although we recognise that the housing delivery target for Raunds within the JCS has already been met this should not be read as a not to be exceeded target. This issue was addressed within the appeal decision for application 20/00347/OUT located to the south west of the current application site. At Paragraph 17 of the appeal decision the Inspector concluded:-

*“Paragraph 4.9 of the NP states that as Raunds has met its housing requirement there is no need to allocate additional land for housing. **Nevertheless, housing figures set a minimum requirement. As such, this would not preclude the delivery of further sites for housing that accord with the objectives of the Framework.** (our emphasis) In this case, the scheme would make efficient use of previously developed land and would be within the existing pattern of built form of the settlement. It therefore offers a suitable site, in principle, for residential development.”*

In effect this position was underpinned prior to the appeal being submitted for application 20/00347/OUT. The officer report prepared prior to the application being heard by the East Northamptonshire Council planning committee reports that it approached the Head of North Northamptonshire Joint Planning and Delivery Unit and also the Principal Planning Policy Officer for comment on additional housing delivery in Raunds. The response is set out below:-

“JCS Policy 29/ Table 5 sets minimum housing numbers that must be provided for in line with the spatial strategy. This guides allocations in the Part 2 Local Plans and Neighbourhood Plans but does not preclude higher numbers being accommodated at the Growth Towns and Market Towns if other development plan policies are complied with. This has been the case in other North Northamptonshire Market Towns such as Burton Latimer and Desborough where commitments significantly exceed JCS requirements.”

It cannot therefore be disputed that although the NP or Part 2 Local Plan do not seek to allocate additional residential sites this should not preclude new residential development from being positively considered subject to compliance with other policy in the development plan.

As previously indicated the Neighbourhood Plan and Emerging Part 2 Local Plan do not provide a settlement boundary for Raunds. We would contend that the development provides a logical infill to the northern edge of the settlement.

10. Section 9 of NPPF sets out requirements for promoting sustainable transport. The requirements of paragraphs 104 and 105 are addressed elsewhere in the application submission and detail is not repeated therefore in this planning statement.
11. Parking provision for the new development has been assessed against the requirements set out within the Northamptonshire Parking Standards (September 2016) and therefore the requirements of paragraph 107 are met.
12. Paragraph 111 indicates that development should only be refused on highway grounds if *“if there would be an unacceptable impact on highway safety, or the residual cumulative impacts*

on the road network would be severe.” The Transport Statement submitted as part of this application demonstrates that there are no adverse impacts on the local highway network.

13. Section 10 of NPPF highlights the importance of communications infrastructure in all new development. Paragraph 114 states that *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.”* A desktop review of postcode NN9 6UQ on Uswitch revealed broadband service provides offering Ultrafast Broadband speeds of up to 500Mbps. BT offer Fibre 2 Broadband connections with an average speed of 67 Mbps.
14. Section 11 sets out requirements for making effective use of land. Paragraph 119 requires that *‘planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment.’* The land, whilst greenfield, is not of a significant size for modern agricultural purposes and has little ecological value. The application is supported by a landscape strategy and biodiversity net gain calculations which demonstrate that the development would achieve a significant biodiversity enhancement to the area.
15. Section 12 sets out how well-designed places should be achieved. Whilst the application is in outline form the illustrative site layout and supporting sustainability assessment show that the scale, development pattern and visual appearance of the proposals has been carefully designed to reflect the development pattern of existing estate residential development on the northern edge of Raunds. The objectives of Paragraph 130 a) – f) can be met as reserved matters stage.
16. Paragraph 174 requires decision making to consider how proposals contribute and enhance the natural and local environment. It requires:-
 - *“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
 - *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;*

Whilst it is accepted that the development is located on greenfield land the area has no specific landscape designation and the site has no real value to biodiversity. The application proposes significant new landscaping and biodiversity enhancements.

17. Overall, the development fulfils the aims set out within NPPF.

The Development Plan and policies applicable to this Application

18. Section 38(6) of the Planning and Compulsory Purchase Act provides that where a determination is to be made, that determination shall be in accordance with the development plan unless material considerations indicate otherwise. It is implicit that the development plan is taken 'as a whole'. Therefore, it is possible for there to be a breach of development plan policy as well as compliance with other development plan policy, and the nature and extent of the breach (major or minor) is to be weighed in the planning balance by the decision maker.
19. In this instance the development comprises the North Northamptonshire Joint Core Strategy Part 1 (adopted 14 July 2016) and the Raunds Neighbourhood Plan (made November 2017). The following policies are considered relevant to the determination of the application:-
- North Northamptonshire Joint Core Strategy policies 1,3,4,5, 6,8,9,10,11,28,29,and 30.
 - Raunds Neighbourhood Plan policies R1, R2, R3, R4, R5, and R10

North Northamptonshire Joint Core Strategy

20. Policy 1 of the JCS sets out a Presumption in favour of sustainable development. Sustainability is assessed in detail within the discussion of NPPF and it is argued that assessed against 2021 NPPF the development should be considered sustainable.
21. Policy 3 requires that development should be located and designed in such a way that is sensitive to its landscape setting. The accompanying Design and Access statement and Landscape Visual Impact Assessment sets out in detail the design strategy and the LVIA provides a full assessment of landscape character. The application although submitted leaving all matters with the exception of access reserved for future approval provides illustrative design layouts showing how the residential development could be successfully delivered.
22. Policy 4 requires that all development should achieve a net gain in biodiversity. This is set out within the proposed landscape strategy and biodiversity net gain (BNG) calculations and the detail is not therefore repeated in this statement suffice to say that BNG is achieved within the proposed development. Paragraph a) ii of the policy also requires:-
- “Protecting key assets for wildlife and geology, in particular the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar Site, from unacceptable levels of access and managing pressures for access to and disturbance of sensitive habitats;”*
- In accordance with the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document (SPA SPD) the appropriate mitigation payment will be made through an appropriate form of Section 106 Agreement in accordance with advice provided to the LPA by Natural England.
23. Policy 5 requires that all development should contribute towards the reducing flood risk. The development is located within a Zone 1 flood risk area but as the outline application exceeds

1 hectare in area the application is accompanied by a detailed Flood Risk Assessment (FRA) and storm drainage strategy which incorporates SuDS techniques. The objectives of policy 5 are met within the development strategy.

24. Policy 6 indicates that “the local planning authorities will seek to maximise the delivery of development through the reuse of suitable previously developed land and buildings.” Whilst not directly relevant to the core area of development the application proposal does in part re-use land historically used as a quarry for brick manufacture. This area of land will provide SUDs features as well as landscaping and significant biodiversity enhancement.
25. Although the planning application reserves all detailed design matters for subsequent approval the illustrative site layout demonstrates how good connectivity can be achieved. The development would provide a well-designed street network connecting to the wider settlement. The site is well located for public transport and over 1.4 hectares of land is devoted to public open space and biodiversity enhancements. Raunds is identified in the development plan as a market town and is considered a sustainable location. All town facilities are located within walking distance of the site. Paragraph 5.20 of the jCS sets out principles for towns requiring that:-
- They be well connected places
 - Have a mix of uses
 - Provide Streets for all

All objectives would be met and it is particularly of note that this outline application is submitted alongside a full planning application for the expansion of New Barn Farm Industrial Estate. The residential development would be perfectly locates for ‘*services and jobs located whether people can get to them easily including by foot.....*’

Overall, it is considered that the development could provide the highest design standards in accordance with Policy 8 of the JCS.

26. The objectives of Policy 9 will be largely met by demonstrating compliance with the 2022 updated Building Regulations. Water efficiency requirements will be met through the optional requirements set out in Approved Document G. Paragraph 2a) we would contend has been rendered out of date by the introduction of Approved Document) in the building regulations which seeks to reduce the amount of glazing on south facing facades and also provides stringent measures for shading in order to protect against overheating. Nevertheless the development would provide a high quality energy efficient development.
27. Policy 10 requires that development is supported by the timely delivery of infrastructure. Clearly the target for this policy is major strategic sites but nevertheless in a small way the residential development can demonstrate compliance with the policy. All utility infrastructure is in place to support the development. Anglian Water has confirmed capacity within their drainage network and an attenuated storm drainage strategy is provided within the submitted FRA. HV electric infrastructure already exists on site and full fibre broadband exists along Brick Kiln Road.
28. Policy 11, paragraph 1b) refers to Market Towns. It states:-
- “The Market Towns will provide a strong service role for their local communities and surrounding rural areas with **growth in homes** (our emphasis) and jobs to support

regeneration and local services, at a scale appropriate to the character and infrastructure of the town;”

The Raunds Neighbourhood Plan does not allocate any housing sites within the plan but we would contend that its policies must set out an expectation that residential windfall sites will come forward. It is also notable that the Raunds Masterplan whose purpose was to provide a ‘spatial strategy for the town over the next 15 years (2011-2026) highlighted the application site as a potential development site.



Extract of ‘Raunds Masterplan – Diagram providing a framework for potential new homes and jobs’

29. Policy 29 of the JCS confirms that “*New housing will be accommodated in line with the Spatial Strategy with a strong focus at the Growth Towns as the most sustainable locations for development, followed by the Market Towns.*” This report does however acknowledge that the housing delivery target set out at Table 5 for Raunds (1060 dwellings) has already been met. Nevertheless paragraph 9 of this statement sets out a recent appeal decision for Raunds in which the Inspector concluded that further development should not be precluded simply because the housing target has been met within the plan period.
30. Policy 30 of the JCS requires that new developments provide a sustainable housing mix. The illustrative scheme provides a mix of housing types geared towards delivering properties suited to small to medium sized families. However, at this stage it is important to recognise that the planning application is outline in nature and the final housing mix can be agreed with the Council as part of a Reserved Matters application at a subsequent stage. Policy 30b) and 30c) would also be complied with at Reserved Matters stage.
31. In excess of 30% of the total housing delivery on the site would be affordable in accordance with Policy 30d) of the JCS. This can be secured through a Section 106 Agreement with the Council in accordance with Policy 30e)

Raunds Neighbourhood Plan

31. As previously indicated although the position of Raunds Town Council would seem to be that 'Raunds has taken its share of housing' the Neighbourhood Plan is made on the basis that residential development proposals will come forward. Policy R1 requires that new residential development will be expected to be accompanied by evidence to show how the proposals by virtue of type and size of dwelling proposed will contribute to meeting the future housing needs of Raunds. As this application is submitted in outline form leaving all design matters reserved for future approval the precise housing type and mix can be negotiated with both the LPA and Town Council prior to submission of a Reserved Matters application. The applicant will be very willing to engage.
32. Policy R1 also requires that future development will be required to make a financial payment for the Upper Nene Valley SPA/Ramsar mitigation which is accepted and discussed elsewhere in this document.
33. Policy R2 sets out the vision for achieving good design in Raunds. It sets out 11 criterion which we address below:-
 - a) Although the proposal does not directly affect any designated or non-designated heritage assets footnote 68 of Section 16 states 'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.' The area was highlighted at pre-application stage as potentially having archaeological significance and substantial investigations have taken place (by University of Leicester) of which the Town Council has been made aware. A detailed report identifying the archaeology found is provided in support of the planning application.
 - b) The detailed design for the development does not form part of this planning application.
 - c) The supporting LVIA, Transport Statement and noise assessment demonstrate that the proposals will have no adverse impact on residential amenity.
 - d) The supporting Stage 1 ground investigation and noise assessment indicate that the development will not cause any detrimental impacts. The residential development would not result in light or air contamination.
 - e) This criterion only applies to non-residential development.
 - f) The buildings will need to comply with current Building Regulations and in addition the JCS sets out a requirement for major residential development.
 - g) The illustrative residential layout demonstrates good access for all members of the community.
 - h) A detailed Crime Impact Assessment is provided within the supporting Design and Access Statement.
 - J) It is contended that the proposal would inform an infill to the northern edge of Raunds and would fully integrate into the town.
 - k) In view of the response to criterion j) this is not relevant to the application.
 - l) It is expected that external lighting design would form part of the conditions on a permission (should planning permission be forthcoming).

34. As the application leaves all detailed design matters for future determination Policy R3 is not directly relevant to the assessment of the outline planning application but it is fully expected that a future reserved matters application would demonstrate all design layouts to be flexible and adaptable.
35. Parking standards are addressed within the supporting application documents showing compliance with existing NNC Highways parking standards. As such the development complies with Policy R4.
36. Although the outline application reserves all detailed design matters for subsequent approval the illustrative site plans show in excess of 1.4 hectares devoted to public open space. The requirements of Policy R5 would be exceeded.
37. Policy R10 is addressed in detail within the submitted Transport Statement, Access Design and vehicle tracking. The proposed residential development would provide a safe environment for pedestrians, cyclists and other road users and there would not be a detrimental impact on highway safety on Brick Kiln Road or the wider highway network.

East Northamptonshire Part 2 Local Plan

38. The current Local Plan Part 2 (1996 District Local Plan) has 6 saved policies none of which are relevant to the assessment of this outline planning application.
39. Although not yet adopted the Part 2 Local Plan has been submitted to the Secretary of State for examination and the main modifications have been published and consulted upon (consultation closed on April 21st 2023). The Part 2 Local Plan will therefore attract some weight in the LPA's deliberations.
40. Table 2 of section 4.0 (Spatial Development Strategy) sets out the overall spatial role for the Market Towns of Higham Ferrers, Irthlingborough, Oundle, Raunds and Thrapston. It states:-
- “To provide a strong service role for their local community and wider rural hinterland. “*
41. Policies EN1 (Spatial Development), EN10 (Enhancement and Provision of Open Space), EN13 (Design of Buildings / Extensions), and EN30 (Housing mix and tenure to meet local need)
42. Raunds is identified in Policy EN1 as an Urban Area and listed under 1b) of the policy description:-
- “Development will be focused upon the major committed development sites at Irthlingborough (including Crow Hill), Raunds and Thrapston. Further development at these towns will focus upon urban reimagination, to support job creation, regeneration and to secure and enhance the local service base.”*
- The terminology ‘urban reimagination’ isn’t defined but suggests that new development may be resisted and there should be a focus on the regeneration of existing sites. This would appear to be in conflict with the Raunds Neighbourhood Plan which sets out detailed policy for new residential development even though no new residential sites are allocated. The appeal decision referred to at paragraph 9 establishes that new residential development should not be refused simply because the housing target for Raunds has been met.
43. Policy EN10 sets out requirements for public open space and once again although the application is submitted leaving all detailed design matters reserved for subsequent approval the illustrative site layout for the development provides for 1.45 hectares of public open space which will far exceed the requirements set out for Raunds at table 8.
44. Policy EN13 sets out requirements to achieve good design. The application is submitted in outline form and therefore all design matters would be addressed at Reserved Matters stage but based on the illustrative design information submitted with the outline planning the supporting documents illustrate how the 9 criterion could be achieved at detailed design stage.
45. Policy EN30 requires that all housing will be expected to provide a suitable mix and range of housing as set out In JCS Policy 30. The document and submitted Design and Access Statement set out an illustrative mix but as documented elsewhere the proposed mix could be adapted

at Reserve Matters stage to suit differing requirements identified by the LPA, Raunds Town Council and the affordable housing team.

Conclusions

46. This outline planning application seeks consent for the erection of 87 dwellings on the site including 27 affordable dwellings on the site located north of Brick Kiln Road with access as a matter for consideration (all other matters reserved).
47. Although Raunds has already achieved the housing target of 1060 dwellings over the plan period 2011-2031 appeal precedent records that this in itself is not justification for the refusal of additional residential development in Raunds.
48. The proposed dwellings on the illustrative site plan had been arranged to provide properties set back from the road frontage and to a similar development pattern to adjacent established residential development. The proposal will increase the level and provision of affordable housing in the area helping the LPA ensure that the housing needs of differing groups within the community can be met.
49. The submitted Transport Statement details that the proposal will not have a detrimental impact on the local highway network. Parking Requirements can be met in accordance with current standards and the application is supported by a framework travel plan.
48. The submitted Landscape and Visual Impact Assessment justifies that the development will not cause harm to the wider landscape setting.
49. The proposal will create significant Biodiversity Net Gain and the provision on on-site public open space exceeding recommended standards.
50. The application is supported by a detailed flood risk assessment and drainage strategy detailing how SuDS techniques would be incorporated and demonstrating that the proposed development would not increase flood risk elsewhere.
51. The scheme should be considered to be sustainable development and we contend is fully in accordance with the development plan. As such we respectfully request planning permission be granted.
52. Overall, the proposed development is considered to respect and enhance the character and setting of the area. As such we contend that it is in compliance with paragraphs 11 and 14 of NPPF and the Council are invited to approve the outline planning application.