

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

**EAST NORTHAMPTONSHIRE COUNCIL:
RESPONSE TO EXPLORATORY
MEETING, 26 JUNE 2008**

16 July 2008



East Northamptonshire Council

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1. Introduction

- 1.1 The Exploratory Meeting was held on **26 June 2008**. Three particular areas of concern had been raised by the Inspector, which were discussed at the meeting:
- The need to demonstrate a continuing 5-year supply of housing land;
 - The need for a detailed housing trajectory and implementation strategy;
 - Consistency with the North Northamptonshire Core Spatial Strategy, as modified following receipt of the Inspector's Report (May 2008).
- 1.2 Following the meeting, the Inspector concluded that the Rural North, Oundle and Thrapston Plan (RNOTP) should proceed to the hearing sessions (October 2008). However, additional work would be necessary to:
- Demonstrate that the Council is able to sustain a 5 year supply of housing land;
 - Provide separate housing trajectories for the RNOTP;
 - Demonstrate that the emerging Transport Strategy is a strategic document and this will not be an absolute barrier to new major development sites coming forward, particularly in Oundle.
- 1.3 This document will summarise the key findings of additional work which has been undertaken. Full information is set out in **appendices 1 – 12**.

2. 5 Year Housing land supply – outline of the key issues

- 2.1 At 31 March 2008, 2.6 years of housing land was available in the form of extant planning permissions for the District. Officers have disaggregated these, and reviewed the proposed allocation sites in the RNOT, Three Towns and Raunds Area Plans, together with major windfall sites expected to receive planning permission within the near future (**Appendix 1**).
- 2.2 Several major development sites, both windfalls and allocations in the three emerging Plans, are being actively promoted by development agencies through the planning process. A conservative estimate of the timescale for their implementation has been included in the housing land supply calculations (**Appendix 2**). This approach to calculating the housing land supply has been carried out in accordance with PPS3 and the recent CLG/ PINS advice note: "Demonstrating a 5 Year Supply of Deliverable Sites", March 2008 (**Appendix 3**):
http://www.planning-inspectorate.gov.uk/pins/advice_for_insp/advice_produced_by_dclg.htm.
- 2.3 The CLG/ PINS guidance states that to demonstrate a 5 year supply of housing land, it will be necessary to identify potential sites:
- That are allocated for housing in the Development Plan;
 - That have planning permission (outline or a full planning permission that has not been implemented); or
 - Specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery.

Rural North, Oundle and Thrapston Plan area housing land supply

- 2.4 When deliverable housing allocations and large forthcoming windfall sites are included in the housing land supply calculation for the RNOTP area alone (in accordance with the CLG/ PINS advice) the housing land supply at 31 March 2008 for the RNOTP area is calculated at **6.2** years.
- 2.5 Full details of housing land supply calculations, using the “residual” method, are set out in **Appendix 3**. The list of sites, with 5 year deliverable totals (**Appendix 1**), indicates that approximately an additional 450 dwellings will be deliverable from 1 April 2008 – 31 March 2013 in the RNOTP area, over and above the level of housing land available in the form of extant planning permissions at 31 March 2008.

Need for an Implementation Strategy (PPS3 paragraph 62)

- 2.6 GOEM has expressed concerns that in order to accord with PPS3 more details are needed about the Plan approach to scenario and contingency planning; risk assessment; engaging housebuilders and stakeholders; and triggers for action.
- 2.7 **Appendix 2** sets out the progress with forthcoming major development sites throughout the District, together with estimates of when individual sites are likely to be come forward as additional housing land supply. In particular, a planning application has already been submitted for the majority of the Thrapston South allocation (Policy THR5), while planning permission for the King’s Cliffe proposals are expected to be granted imminently. Pre-application work, including public engagement, is well advanced for both of the Oundle sites.
- 2.8 Additionally, outside the Plan area planning permissions for major housing developments (over 400 dwellings) at Higham Ferrers and Irthlingborough are expected to be granted imminently. Pre-application masterplanning work is also currently underway for the urban extensions to Irthlingborough and Raunds, which are likely to be the most significant new developments for the whole of the District over the next 15 years.
- 2.9 Overall, **Appendix 2** demonstrates that the Council continues to maintain an active engagement with many stakeholders in terms of bringing most of the proposed major development sites forward. PPS3 also emphasises the need for the Plan to address scenarios such as downturns and fluctuations in the housing market.
- 2.10 Progress in bringing forward the major sites in the Plan area, together with the wider District, demonstrates that at the local level the housing market remains buoyant. This is clearly critical to ensure the continuous delivery of housing for the remainder of the Plan period (to 2021). The continued progress by the Council in actively working with stakeholders to bring most major development proposals forward will minimise the risk of deteriorations in market interest, which could then jeopardise the delivery of the CSS and RNOTP targets.
- 2.11 Furthermore, In order to ensure a continued housing supply in the Plan area, it will be necessary to begin to review the RNOTP soon after its adoption. The CSS Inspector’s Report (12 May 2008) stated that while this was generally sound, an early review was necessary to ensure that the necessary infrastructure is in place to give certainty to the required housing and employment provision (paragraph 142).

- 2.12 Accordingly, the Joint Planning Unit has begun preliminary work towards undertaking an early review of the CSS. This is also the trigger for an early review of the RNOTP, with a draft LDS update being presented to the Council's Planning Policy Committee on 17 July 2008. The update sets out a programme for an early review of the RNOTP, with pre-submission public consultation scheduled to take place from autumn 2010.

3. Housing trajectories

- 3.1 At the Exploratory Meeting, the Council proposed that it is not necessary to provide separate housing trajectories for each of the three Plan areas because:
- The newly adopted Core Strategy contains a North Northamptonshire housing trajectory;
 - The December 2007 AMR contains a District-wide trajectory;
 - It is only necessary to maintain a 5 year supply at the District, and not Plan area, level;
 - The RNOTP will only deliver around 33% of the District housing target to 2021.
- 3.2 However, the Planning Inspector requested that the Council should produce a separate trajectory for the Plan area (Exploratory Meeting Note, DOC809(2)) in order to fulfil the requirements of PPS3 (DOC102) and this has now been done, as described in this response.

Methodology

- 3.3 In order to provide comprehensive information for the Plan, separate trajectories for the whole RNOTP area and also for Oundle and Thrapston within the area have been provided to assist the assessment.
- 3.4 In preparing these trajectories, officers have been able to take account of the recently completed residential land availability data, for 1 April 2008 (**Appendix 4**). The trajectories are all based upon the housing completion rates from 1 April 2001 – 31 March 2008, which indicates that 32% of the total RNOTP area has already been delivered. These completions are a combination of both windfalls and longstanding commitments, no new land having been allocated for housing since 1996.
- 3.5 The Inspector raised specific concerns about the shortfall in housing supply for Oundle. One such concern is the apparent shortfall in the allocated supply of land, compared to the CSS target (610 dwellings). As such, certain assessments have been made with regard to possible longer term development proposals for Oundle.
- 3.6 The trajectories are based upon the following key assumptions (see also **Appendix 5**):
1. An initial completion rate of around 40 dwellings per year on the allocated sites (**Appendix 6**).
 2. Overall annual completion rates have been calculated using the previous mean completion rates for similar sized sites (**Appendix 7**).
 3. The adopted RSS8 (DOC225) trajectory provides for 520 dwellings per year (2001-2011) and 420 dwellings per year (2011-2021), which equates to 55% of housing (2001-11) and 45% (2011-2021). These percentages have been incorporated into the trajectory calculations.
 4. The rural completion rate for the RNOTP area is forecast to continue at 43 dwellings per year for the remainder of the Plan period (to 2021).

5. There is an overall 5 year supply of “deliverable” housing land for the District as a whole, and for the Plan area, when forthcoming sites are included in the calculations (see **appendices 1, 2 and 4**).
6. Long term sites in Oundle (RNOTP paragraph 8.11) are all classed as “developable” under the PPS3 definition.
7. “Lead in times”, e.g. for providing the necessary on-site infrastructure, are built into the forecasts.
8. Allocated sites in Oundle are estimated to be completed by 2013, while Thrapston South (THR5) is likely to take the remainder of the Plan period to complete.

Plan Area Trajectory (Appendix 8) – reference to housing development in rural areas

- 3.7 Specific trajectories for Oundle and Thrapston have been calculated (see below), given that both settlements were set specific CSS targets (610 and 1140 dwellings respectively). The CSS also contains an overall figure of 1460 dwellings for the rural areas of the District as a whole. Given past completion rates, it has been calculated that 92% of rural housing completions (approx 1340 dwellings) will be built in the RNOTP area.
- 3.8 The completion rate for the RNOTP area averaged 43 dwellings per year (2001-8), which equates to 559 dwellings for the remaining 13 years of the Plan period (**Appendix 9**).
- 3.9 Under PPS3 paragraph 59, in most cases windfall allowances should not be included in the housing supply calculations. The adopted approach to housing in the rural areas is that, in accordance with previous experience and both the adopted CSS and the RNOTP strategy, most is expected to be delivered in the form of small scale infill and windfall development, with just one substantial allocation (for 145 dwellings) at King’s Cliffe.
- 3.10 In this case, it is consistent, realistic and appropriate to include a rural area windfall allowance; based upon the previous mean housing delivery rates, given that most development will be limited to such small sites. It should be noted that **no** windfall allowance has been made for the Oundle and Thrapston urban areas, though previous experience indicates that some will occur. This approach has been taken to maximise the likelihood that the trajectories are likely to be conservative forecasts.
- 3.11 A further consideration is the Rural Potential Study (DOC329), which estimates that there is potential for an additional 447 dwellings on windfall sites within villages in the Plan area.
- 3.12 It should be borne in mind that “brownfield” sites adjacent to village boundaries, though potentially acceptable within the requirements of the adopted CSS Policy 1, were not included in the earlier Rural Potential Study (RPS) work. Also, the overall CSS figure (1460 dwellings) for the rural area is ‘indicative’ only (para 3.87, submitted CSS). Given this methodology applied to the RPS, i.e. the exclusion of such potential sources of rural windfall development and the expected nature of housing development in the rural area, any apparent RPS shortfall is not therefore considered to be significant.

Oundle Trajectory (Appendix 10)

- 3.13 Concerns have been expressed about the possible shortfall of housing land in Oundle. It is estimated that the development of the two allocated sites in the town (270 dwellings) will be complete by 2013, i.e. these sites will provide the required 5 year supply of deliverable housing land in the town.
- 3.14 Officers are confident that both sites will come forward for development within 2 years, given the current progress by the promoters of both sites towards the submission of applications. Notably, baseline Transport Assessments for both of the allocated sites in the RNOTP (Policy OUN3) were recently published.
- 3.15 The RNOTP identified four possible longer term development sites around Oundle, with an estimated capacity over 900 dwellings (paragraph 8.11). Under the PPS3 definition, these sites are classified as “developable”, in that they are all being actively promoted by a developer or landowner as possible allocation sites. The combined capacity of these sites would clearly vastly exceed the CSS requirement. However, the Council has taken no decision as to which of these sites may be the preferred option when the Plan is reviewed, following further progress to local transport infrastructure plans, as referred to below.
- 3.16 The completion of 270 dwellings on the allocated sites by 2013 is anticipated to be preceded by a review of the Plan where one, or more, of the longer term development sites might then be allocated. Assuming a completion rate of 40 dwellings per year on the longer term sites, it is calculated that the CSS requirement (610 dwellings) will be met by around 2017.

Thrapston Trajectory (Appendix 11)

- 3.17 The Thrapston South site (THR5) will easily fulfil the outstanding balance of housing for Thrapston set out in the CSS. It is estimated that housing on the Thrapston South allocated sites will take the remainder of the Plan period to develop, assuming a completion rate of 40 dwellings per year as set out in the Thrapston trajectory (**appendices 6 and 11**).
- 3.18 It is currently unnecessary to look to longer term development proposals for Thrapston, as the Thrapston South allocation is estimated to easily fulfil the outstanding balance on the CSS requirement of 1140 dwellings. Given that the majority of the site is already subject to a pending planning application, it is clearly being actively promoted for development. As no substantial development constraints were identified in the Sustainability Assessment of Sites (DOC322), the Thrapston Site is assumed to start delivering housing within 2 years, with development anticipated to take place over the remainder of the Plan period.

Conclusions

- 3.19 The three housing trajectories provided (**appendices 8, 10 and 11**) demonstrate that the Plan is being prepared within the new national housing framework set out in PPS3. Preparation work on planning applications for all of the main allocated sites in the RNOTP is well advanced, so it is estimated that all will begin to deliver new housing within 2-3 years (**appendices 1 and 2**).

- 3.20 The majority of new housing in the rural area is expected to be delivered as windfall development (**Appendix 12**). It is assumed that the current rate of housing delivery in the rural area (43 dwellings per year) will continue for the remainder of the Plan period (to 2021). This equates to a marginal shortfall (110-120 dwellings) in the calculated Rural Potential figure compared to the level of development predicted in the RNOTP trajectory.
- 3.21 The Oundle trajectory includes a prediction that the allocated sites in the Plan will be delivered in full by 2013. In a future review of the Plan, it will be necessary to allocate further developable sites, as set out in paragraph 8.11 of the RNOTP, in order to meet the CSS requirement of 610 dwellings.
- 3.22 Finally, the current quantity of windfall development delivered in Thrapston, added to the estimated capacity of the proposed allocation sites at Thrapston South indicates that sufficient land is allocated in Thrapston in the RNOTP. The allocated sites are anticipated to be implemented over the remaining duration of the Plan period.

4. Plan approach to infrastructure delivery

- 4.1 The Inspector raised a concern, in particular relation to Oundle, that the RNOTP approach to infrastructure provision is now inconsistent with the CSS infrastructure policy (Policy 7 of the submission CSS). The CSS infrastructure policy (Policy 6), as adopted, was revised by the Inspector, who removed the negative wording from the text. Two areas of concern were specified:
- RNOTP infrastructure policies (OUN1 and THR1) are no longer consistent with the adopted CSS approach to infrastructure.
 - Policy OUN1 refers to a “Transport Strategy”, currently under preparation, which the Inspector fears could preclude certain development sites in Oundle.
- 4.2 The Inspector’s particular concerns reflect GOEM’s representations; that the Phasing and Infrastructure policies (Policy 3 and OUN1 respectively) are excessively restrictive and could stifle delivery of the CSS target over the Plan period.

Possible RNOTP inconsistency with the CSS infrastructure policy

- 4.3 The Inspector identified concerns that the RNOTP infrastructure policies (OUN1 and THR1) are overly negatively worded. The current wording reflects the perceived need to resist significant housing developments unless appropriate infrastructure is in place to cope with these so that houses are not built which cannot then be serviced.
- 4.4 The need for specific Plan policies to be positively worded is recognised, together with the need to ensure that the Plan’s infrastructure policies do not contain “loopholes” which would allow for contradiction of the strategy. It is emphasised that RNOTP should not allow mechanisms by which the requirements for enhancements to infrastructure in Oundle and Thrapston could be avoided.

Status of the emerging Transport Strategy

- 4.5 The Inspector raised concerns about how critical the completion of a Transport Strategy for the East Northamptonshire towns is for the implementation of new housing in Oundle and Thrapston. He emphasised that the status of the Transport Strategy needs to be clarified, in order to ensure that this requirement in Policy OUN1 cannot be used to stifle future development in Oundle. These concerns are addressed below.
- 4.6 Officers of Northamptonshire County Council's Sustainable Transport section have been actively engaged in the preparation of the Transport Strategy. An initial draft version of the document was sent through in May 2008, for ENC officers to comment upon. This is, not yet, however, approved by County Council Cabinet Members.
- 4.7 ENC officers met NCC Sustainable Transport officers on 11 June. NCC Sustainable Transport has provided substantial details about the key functions of the Transport Strategy document and how this should be utilised in practice.
- The Strategy will address the cumulative impact of development proposals upon the six towns in East Northamptonshire District.
 - It is intended to act as technical guidance, not a policy or consultation document.
 - It takes into account the CSS 20% modal shift target.
 - It will enable a move towards a pooled developer tariff for transport infrastructure.
 - Private developer funding will be utilised through travel plans.
 - More survey work is needed to analyse "Travel to Work" census data, particularly regarding commuting to centres outside the county, e.g. Bedford, Peterborough etc.
- 4.8 The Transport Strategy makes a number of detailed recommendations regarding individual proposed development sites throughout the District. These will then be used in the preparation of masterplans for the allocated sites.
- 4.9 Through these discussions, NCC officers confirmed that the Transport Strategy is **not** critical in determining the outcome of the Oundle development strategy, as set out in the RNOTP. Details about the individual allocated sites such as access arrangements are more critical in determining the outcome of specific development proposals, while the wider Transport Strategy will provide a context for future and longer term developments in and around the towns, with particular reference to Oundle.

Baseline Transport Assessment and survey work undertaken to date

- 4.10 Throughout the process of drafting and submission of the RNOTP, ENC and Oundle Town Council Officers and Members have been acting in the role of facilitators, in order to ensure that local infrastructure concerns will be addressed prior to new developments coming forward. This issue is particularly pertinent with regard to the Oundle development strategy and the Plan approach to infrastructure provision, as set out in Policy OUN1.

- 4.11 Many meetings have been held throughout 2007-8, involving stakeholders such as the District and Town Councils, the highway authority (Northamptonshire County Council), developers, transport and design consultants and “Oundle Under Threat”, an active local residents’ group. To this end, a working group has been set up to scrutinise and enhance the Ashton Road/ Herne Road development proposals as these come forward. This site is the priority development proposal for Oundle, given that it is expected that it will come forward before the Creed Road site.
- 4.12 The Oundle development strategy (policies OUN1-3) has been explicitly written to address the cumulative impact of development and ensure that this comes forward in a coordinated way. In particular, the promoters of the Ashton Road/ Herne Road and Creed Road housing sites have employed a common transport consultant, Woods Hardwick.
- 4.13 Progress in preparing Transport Assessments for both sites has been regularly reported, at meetings hosted by both East Northamptonshire Council and the Town Council over the previous 18 months. This has culminated in the publication of baseline Transport Assessments by Woods Hardwick for both housing sites, which are currently being considered by the highway authority and other key stakeholders.

Transport modelling work previously undertaken for the preparation of the Core Spatial Strategy

- 4.14 The Inspector’s overall concerns are that it is unclear whether appropriate evidence gathering work has been done to address transport issues, with particular regard to Oundle. It is stressed that much work has been undertaken already, as a critical element in preparing the CSS.
- 4.15 The Preferred Options for North Northamptonshire Core Spatial Strategy (Nov 2005) specified, at Table 2, a preferred option for the distribution of new housing. This provided details of the preferred level of housing growth to be accommodated across North Northamptonshire, in line with regional guidance, and identified Oundle as accommodating 610 additional dwellings to 2021. This figure was tested through technical work, consultation and the examination process and has been carried forward to the adopted CSS. Transport modelling was an important element of this work.
- 4.16 The transport consultancy Atkins was commissioned by Northamptonshire County Council to undertake transport modelling based upon the Preferred Option for distributing development. The North Northamptonshire Transport Model identified the impacts of proposed new developments in terms of the expected increase in trips on the highway network. This entailed the districts providing Atkins with a list of developments, both proposed and committed, to model through use of excel spreadsheets and the SATURN suite of programmes which make use of TEMPRO growth factors.
- 4.17 The Oundle sites included in the transport model are those that were subsequently included in the RNOTP plan. The transport modelling indicated that, at a strategic level, there are no transport barriers to the proposed level of growth at Oundle. The transport modelling work now underway in Oundle is a further level of refinement to identify necessary improvements in the network and will not question the CSS housing allocation for the town.

Conclusions

- 4.18 Much work has already been undertaken, in order to address local infrastructure issues, particularly those affecting Oundle where the greatest concerns have been expressed throughout the RNOTP process to date. While overall infrastructure concerns exist and have been expressed through the previous consultation stages, local transport issues have proved to be the major concerns.
- 4.19 Much previous infrastructure modelling work was undertaken in association with the CSS process. Given that the CSS has now been found to be “sound” and subsequently adopted, this confirms that the proposed levels of development in Oundle and Thrapston are appropriate. The Council is keen to emphasise, however, that the strategic evidence base is not, in some cases, sufficient to address particular local concerns.
- 4.20 The status of the Transport Strategy has now been clarified. This document provides additional technical details in support of the previous transport modelling work undertaken for the CSS, rather than specific transport policies for towns in the District. However, the Council remains keen to ensure that the RNOTP infrastructure policies are sufficiently robust, in order to ensure that past problems surrounding infrastructure at the local level will not be repeated.

5. Key outcomes arising from the Exploratory Meeting

- 5.1 Officers have considered the concerns which were raised by the Inspector at the Exploratory Meeting on 26 June. This document sets out the Council’s response to each concern and is supported by detailed appendices to demonstrate that the necessary work has, where appropriate, been completed, or is currently underway.
- 5.2 In order to take account of the Inspector’s concerns about the lack of a deliverable housing land supply exclusively in terms of extant planning permissions, the data has been revised to take account of imminent major development sites which are known to be coming forward. This work, undertaken in accordance with PPS3 and recent PINS guidance, demonstrates that East Northamptonshire has above the required 5 year supply of deliverable housing land. Continuing engagement with housebuilders and promoters of all of the proposed housing sites shows that the market remains buoyant and should minimise the impact of any possible downturn in market conditions.
- 5.3 Housing trajectories have also been prepared for the RNOTP area. A Plan area trajectory has been prepared, on the assumption that 92% of the CSS rural area requirement will be delivered in the RNOTP area, considering past completion rates. Trajectories have also been prepared for Oundle and Thrapston, setting out individual development forecasts for these two rural service centres.
- 5.4 This document addresses the Inspector’s concerns about the status of the emerging Transport Strategy and the need to ensure that infrastructure policies OUN1 and THR1 do not become impediments to the implementation of the CSS housing requirements, particularly in Oundle. Much analytical work has already been undertaken to address the concerns, including local traffic surveys in and around Oundle.
- 5.5 Finally, the County Council’s Sustainable Transport Department has confirmed that it is unnecessary to await completion of the Transport Strategy, before releasing sites for development.

APPENDICES

APPENDIX 1 – Estimated delivery on major sites (as at 01.04.2013)

APPENDIX 2 – Progress towards submission/ implementation of major sites (proposed allocations and large windfall sites)

APPENDIX 3 – CLG/ PINS ADVICE NOTE – “Demonstrating a 5 Year Supply of Deliverable Sites” (March 2008)

APPENDIX 4 – Housing land supply – “Residual” method

APPENDIX 5 – Housing trajectory assumptions

APPENDIX 6 – Large Site Completions 2001-2008

APPENDIX 7 – Projected Completion Rates 2008-2021

APPENDIX 8 – RNOT Trajectory

APPENDIX 9 – RNOT Windfall Calculations

APPENDIX 10 – Oundle Trajectory

APPENDIX 11 – Thrapston Trajectory

APPENDIX 12 – Rural Completions 2001-2008