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**EAST NORTHAMPTONSHIRE
RURAL NORTH, OUNDLE &
THRAPSTON PLAN DPD
EXAMINATION**

**PARTICIPANT'S STATEMENT
ON BEHALF OF**

STAMFORD HOMES

AUGUST 2008

Prepared by: Geoff Bolton

Checked by: Simon Smith

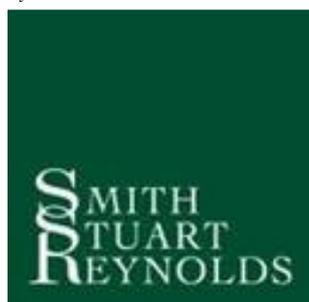
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Prepared by:

Smith Stuart Reynolds
Cottage Farm
Sywell
Northampton
NN6 0BJ

Tel: 01604 782712



Question (a) – Will the policies in the Plan ensure the delivery of housing in the plan area to meet the requirements of the CSS in the light of the guidance in PPS3

1. In relation to Oundle, it is clear that the Plan does not identify sufficient deliverable sites and developable sites for the plan period. Indeed the Council themselves confirm this fact in paragraph 8.8 of the Plan. It is also worth noting that the amount of housing provision achieved at Oundle for the first 7 years of the plan period was 25% below the anticipated level (applying the average annual rate of 30.5 dwellings per annum), with a shortfall of 53 dwellings (214 – 161).
2. Based on the figures released by the Council in July 2008 (see Library Doc. 909), after deducting the numbers of dwellings at the two proposed allocated sites (270), there is an identified shortfall of at least 143 dwellings (or 35%) of the residual requirement of 449 for the remainder of the plan period. The figure of 143 is likely to be optimistic though, as it assumes that the two sites allocated in the Plan will be developed to their stated capacity; however it is entirely possible that the number of dwellings provided on the site at Ashton Road/Herne Road (145) will be reduced through the preparation of a masterplan, given the other uses that need to be accommodated (as acknowledged in Policy OUN3).
3. In its response to the matters raised at the Exploratory Meeting, the Council expects that the two allocated housing sites at Oundle will be delivered within the first 5 years following the adoption of the Plan. Even if this were to be the case, it would leave no identified specific sites for years 6-10 and no specific sites/broad locations for years 11-15. Instead, the Council has listed four sites as possibilities for longer term development, which are to be subject to further assessment, and the Council considers that this matter can be addressed through a review of the Plan (paragraph 8.11 refers). This approach is totally flawed and directly contrary to the advice in PPS3 (paragraphs 53 - 57), which requires that specific developable sites for years 6-10 (and where possible for years 11-15) be shown on a proposals map. It is simply not acceptable to state (Policy OUN1 Proposed Change) that longer term development sites will be brought forward through a review of the Plan, irrespective of whether that review is to take place at an early stage.
4. In addition, it is extremely questionable whether both of the allocated sites at Ashton Road/Herne Road and Creed Road will be completed by 2013, as stated by the Council, for the following reasons:
 - i. The Plan contains a sequential approach to the development of these sites, with Ashton Road/Herne Road being developed prior to Creed Road; and with respective target dates

- for commencement of 2011 and 2013, which are considered to be realistic in the circumstances. Each site is likely to take at least 2-3 years to complete, which gives potential completion dates of 2013/4 and 2015/16 respectively.
- ii. Further transport modelling (to be undertaken by the County Council) needs to take place in order to provide a basis for considering the individual Transport Assessments that will be required to support planning applications; yet the timescale for the completion of this work has yet to be confirmed. (This is a requirement of Policy OUN1)
 - iii. The Ashton Road/Herne Road site is unlikely to come forward quickly, as the mix of land uses has yet to be established through a masterplan.
 - iv. Both sites will be subject to Section 106 Planning Obligations Agreements and these are likely to be complex and time-consuming to finalise, given the emerging approach to developer contributions to infrastructure in North Northamptonshire.
5. The Council's assertion that these two sites will provide the required 5 year supply of deliverable housing land in Oundle must therefore be seriously questioned. Based upon the current deficit of 53 dwellings plus the average annual requirement over the next 5 years ($30.5 \times 5 = 153$), then the 5 year requirement that deliverable sites need to provide is 206 dwellings. After deducting existing permissions (36 dwellings) then provision needs to be made for at least 170 dwellings. In order to meet the likely shortfall arising from delays in bringing forward the proposed allocated sites, as well as contributing to meeting the overall shortfall in provision, land at East Road (the majority of the site allocated for employment in Policy OUN2) should be allocated for housing, as it is deliverable and fully compliant with PPS3.
6. On a related point, the Plan contains no strategy to secure the development of suitable brownfield sites, as required by Policy 9 of the CSS. Also the Plan does not set out a housing implementation strategy as required by PPS3 (paragraph 62) of which a previously developed land target and trajectory is a key component. Therefore the Plan will not assist in achieving the objectives of national policy or the CSS which seek to prioritise the use of brownfield sites.

