
RURAL NORTH, OUNDLE AND THRAPSTON PLAN EXAMINATION

As I understand it the issue raised by the Inspector is whether the approach suggested by ENC (identifying further sites at Oundle and Thrapston in the housing trajectory) would create problems of conformity with the Core Spatial Strategy, in particular the housing requirements set out in Table 5.

The JPU would have concerns about loading additional housing provision on these settlements beyond the levels tested through technical studies and consulted on through the preparation of the CSS and RNOTP. The housing numbers set out in CSS Table 5 reflect the RSS and CSS approach of reducing rates of development in East Northamptonshire and accelerating them in the Growth Towns (see CSS paragraphs 3.60 and 3.62). This approach could be undermined if the housing requirements set out in Table 5 for East Northamptonshire were to be treated as minima (which is the practical effect of not taking windfalls into account) and the JPU welcomes the clarification provided in Policy 13b of the East Midlands Regional Plan (March 2009) that any higher numbers must be tested through development plan documents and sustainability appraisals.

Paragraph 59 of PPS3 does not rule out an allowance for windfalls if the planning authority can provide robust evidence of genuine local circumstances that prevent specific sites being identified. This is, in my view, the situation in the rural areas of North Northamptonshire, where it is impractical to specifically identify the myriad of small potential infill plots and other and redevelopment sites within a large number of villages. In these circumstances, PPS3 states that a realistic allowance should be included having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.

The CSS assumes that housing development in the rural areas will continue to occur, albeit at a reduced rate, through small-scale infilling within villages, conversion of buildings, and affordable housing to meet local needs. The assumptions regarding rural housing development were treated as a 'ceiling' so as not to erode the overall strategy of urban concentration (this is reflected in Table 2 of the CSS Preferred Options document, which gave rural housing numbers as maxima).

The CSS Inspector (paragraph 84 of doc 258) endorsed the inclusion of a windfall element, based on historic trends, within the sources of supply identified in CSS Figure 12. The North Northamptonshire Strategic Housing Land Availability Assessment (doc 335) has subsequently reappraised this and has concluded that there is a clear evidence base for including a windfall element. The SHLAA identifies that, between 2002 and 2008, East Northamptonshire averaged 132 windfall dwellings per annum. In the context of the overall 3398 completions the council recorded over this period, this equates to 23% of total supply – a significant amount.

In terms of carrying windfall forward as an element of housing supply, the SHLAA advocates a cautious approach. Consistent with government guidance (PPS3), and heeding the recent economic slowdown, the SHLAA excludes windfall from the initial five year supply figures and assumes future delivery will be at only 50% of the figure achieved from this source. This approach tempers the reliance on windfall as a source of supply but it is important not to discount in its entirety as this will have the effect of facilitating a general oversupply of housing in the rural areas in conflict with the policy thrust of the Core Strategy.

Although the SHLAA conclusions are at a district wide level, it is clear that windfall sites have provided a steady supply of small sites for housing development in the rural area (see doc 1017) and, given continuing demands for housing in the villages, will continue to do so. ENC's assessment that 43 dwellings per annum will come forward from these sources in the RNOTP villages is considered realistic given the evidence of past trends. Disregarding this significant source of supply and replacing it with specific plan allocations would have the effect of substantially increasing the overall level of housing development in the RNOTP area. In particular, the inclusion of 'long term' sites in Oundle and Thrapston in the trajectory could lead to an oversupply in these settlements of around 40% and 20% respectively, when compared to Table 5 of the CSS. Taken with the acknowledged contribution from windfalls, this would be counter to the RSS and CSS strategy of reducing rates of development within East Northamptonshire.

The JPU's preferred approach to the RNOTP housing trajectory is to include ENC's realistic estimate of windfall development within the rural area. This equates to 43 dwellings per annum over 8 years (discounting the first five years of the remaining 13 year plan period). This gives a potential supply of 344 dwellings from rural windfalls. When combined with the sites identified in the housing trajectory (other than the 'long term' sites) which amount to 1381, this gives a supply of 1725 dwellings to 2021 (excluding any contribution from windfalls within Thrapston and Oundle). This supply compares with a residual requirement from the RNOTP area of 2089 (Inspector's query dated 6th May) leaving a shortfall of 364 dwellings. As previously noted, it is expected that some of this will be provided through windfalls within the urban areas (e.g. redevelopment sites in Thrapston town centre).

This supply satisfies the requirement in paragraph 55 of PPS3 to identify specific developable sites in years 6-10 of the plan period. In respect of the residual supply for later years, the JPU supports the ENC approach of identifying Oundle and Thrapston as the broad locations for this additional growth as this is consistent with CSS Policy 1. In our view this satisfies the requirement of the first bullet of paragraph 55; ongoing monitoring will identify the rate at which windfalls are being delivered and will inform a future review of RNOTP at which point specific allocations can be consulted upon and tested through the plan making process.

Andrew Longley
Planning Manager
North Northamptonshire Joint Planning Unit