



East  
Northamptonshire  
Council

## Planning Policy Committee – 23rd January 2012

### Annual Monitoring Report Update

#### **Purpose of report**

To provide an update to the previously presented report about the Annual Monitoring Report

#### **Attachment(s)**

Appendix 1 AMR Sites Removed

#### **1.0 Background**

1.1 As Members will recall, at the last meeting of this Committee on 12 December 2011 a report was considered in relation to the housing supply element of the Annual Monitoring Report (AMR). At the meeting, four site area discrepancies within the presented tables were identified and Members requested that these be checked and corrected, as appropriate, before the final trajectories were published by the North Northamptonshire Joint Planning Unit.

#### **2.0 Update**

##### **2.1 Site areas and housing densities**

Members had queried four of the site areas as in each case they did not appear to correlate with the estimated total number of dwellings to be provided. Officers reviewed those table extracts and this was found to be due to changes in circumstances, which had been updated in terms of the “total dwellings” column, but the corresponding “site areas column” had not been updated. This amendment has now been made.

In addition, one further change has been identified by officers. This relates to the site referred to as “Raunds North (Additional Barwood’s Land)” which was initially shown to provide for in the order of 520 dwellings. This has been updated to reflect the 230 dwellings set out within the current applications for mixed use development at West End, (a 15.8ha application site, including development of 230 dwellings on around 50% of the total site area). These revisions were submitted to the NNJPU, then discussed with the NNJPU, along with other AMR issues, on 20 December 2011.

##### **2.2 NNJPU issues**

Following the ENC Planning Policy Committee of 12 December 2011, the NNJPU completed their review of all of the AMR data submitted by each of the Local Authorities within North Northamptonshire. They raised some concerns about ENC’s approach to the inclusion of a number of currently unallocated greenfield sites.

This was for three reasons:

- None of the other partner authorities in North Northamptonshire had included unallocated greenfield sites in their supply figures this year. It should be noted that the approach taken by each Local Authority does not have to be consistent, however any inconsistency obviously needs to be clearly explained and justified in the AMR commentary.
- ENC’s approach might be perceived by some as prejudicing future site

allocation decisions that ought to be made specifically through the plan-making process. In particular, the NNJPU notes that it could prejudice the Council's ability to plan for the future of Raunds in particular and its choices with regards to how much development goes to Rushden.

- The trajectory is published and could be used as a material consideration that could well be brought into play by any appellants seeking to gain consent for the development of these sites at a future point in time.

It should be highlighted that by taking out these unallocated greenfield sites it would reduce the available level of housing land supply to below five years. This is, however, the same position as each of the other North Northamptonshire Local Authorities.

### 2.3 Previous East Northamptonshire Council position

In previous years, officers have maintained the position that the AMR should include specific larger unallocated greenfield sites, where firm evidence exists as to them being actively promoted or brought forward for development.

The justification for this may be summarised as follows:

- Previously, ENC used the CLG/PINS Advice Note "Demonstrating a Five Year Supply of Deliverable Sites" March 2008.
- Unallocated greenfield sites within the Four Towns Plan area have to date been included in the AMR. In all cases these were either the subject of current planning applications or were previously proposed as allocations in the Three Towns and Raunds Area Preferred Options (September 2006 and January 2007 respectively), albeit it is accepted that Members' views may have changed in relation to various of these sites.
- Potential longer term development sites at Oundle and Thrapston are specified in the adopted Rural North, Oundle and Thrapston Plan (RNOTP) so it is already publicly acknowledged that these may come forward for development at a later date.
- In March 2011, the Government set out a "presumption in favour of sustainable development"<sup>1</sup>. This stated that "*the default answer to development is 'yes', except where this would compromise the key sustainable development principles*" and that: "*Local planning authorities should...Grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.*" As the Four Towns Plan is in the early stages of preparation, the presumption is considered particularly relevant in this case.

This has been ENC's approach since the 2008 AMR and this approach was endorsed in 2010 through the Mill Lane, Woodford appeal decision where the Inspector concluded that the evidence produced by the Council at the Inquiry has demonstrated that the sites it has identified do meet the requirements of paragraph 54 of PPS3 in terms of their being suitable and available and that there is a reasonable prospect of housing being delivered on them within five years. However, this approach now needs to be reconsidered.

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<http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/presumptionfavour/>

## 2.4 The Approach Now Taken

As highlighted in para. 2.1 above, on 20 December, NNJPU and ENC Planning Policy Officers met to discuss the AMR. As a result ENC Officers agreed to vary their approach to provide a consistent AMR approach for all of North Northamptonshire.

The following changes were agreed:

- Deletion of 12 unallocated greenfield sites (Oundle and Thrapston – longer term RNOTP sites; Higham Ferrers – 2 sites; Raunds – 3 sites; Rushden – 3 sites);
- While the Core Spatial Strategy does not explicitly allocate land for development, Policy 9/ paragraph 4.31 specifically refers to the development of Sustainable Urban Extensions (SUEs) at both Irthlingborough and Raunds. In the case of Raunds there is no clear preferable direction/ location(s) for growth and officers are fully aware of Members positioning in relation to the issues here whereas at Irthlingborough development of an SUE to the west of the town as the preferable direction for growth is now being considered through the current masterplanning exercise and there is also clear evidence that this is the most suitable site. Accordingly, the development of an SUE at Irthlingborough West, currently the subject of an application (including 700 dwellings), is still included within the revised trajectory.

These changes do reduce the deliverable housing land supply as reported to the last committee from 5.36 years, down to 4.12 years. Whilst on the face of it this is a significant issue, the revised approach taken to site inclusion does make defending housing supply matters at appeals/ public inquiries much less onerous as there are less available / deliverable supply details to debate. This is because without exception, when a local planning authority claims to have a five year housing land supply, this will be challenged by developers.

Overall these changes are therefore considered to make the AMR trajectories potentially more robustly defensible. Furthermore, as additional sites gain permission they can be added to the supply figures.

The details of the sites removed from the table as presented to the last meeting of the Committee are set out in Appendix 1.

## 3.0 Conclusions

3.1 The removal of the specified sites from the trajectory reduces the five year deliverable land supply to 4.12 years. However, as set out above, this provides certain benefits in approach, for example by removing the potential perception of prejudicing future development decisions on specific proposals and future site allocations, and therefore on balance this is considered to represent a good way forward.

3.2 In order to ensure that Members are involved at an earlier stage, Officers will aim to present the 2012 AMR information report to the ENC Planning Policy Committee at the September 2012 meeting (as ENC's AMR data is usually compiled and submitted to the NNJPU by September each year).

## 4.0 Equality and Diversity Implications

4.1 There are no equality and diversity implications.

## 5.0 Legal Implications

5.1 It is currently a legal requirement to submit an Annual Monitoring Report to the

Secretary of State. Although this will change in 2012 the publication of housing performance will still be required. In addition national planning policy continues to require that the Council should seek to maintain a 5 year housing land supply, otherwise it lays the authority open to ongoing challenges through the planning appeals process.

**6.0 Risk Management**

6.1 As above re- potential for housing land supply issues.

**7.0 Financial Implications**

7.1 None, subject to any housing land supply issues.

**8.0 Corporate Outcomes**

8.1 The relevant Corporate Outcome is:

- Good quality of life – prosperous, sustainable

**9.0 Recommendation**

9.1 Members are asked to note the changes made to the previously presented figures and the reasons for the changes that have been made to site inclusion within the AMR.

<b>Legal</b>	Power: <b>Planning and Compulsory Purchase Act 2004</b>				
	Other considerations: None				
<b>Background Papers:</b> Minutes of Planning Policy Committee 12 December 2011					
<b>Person Originating Report:</b>		Karen Britton (Planning Policy and Conservation Manager) Tel: 01832 742142			
<b>Date: 10 January 2012</b>					
<b>CFO</b>		<b>MO</b>		<b>CX</b>	

(Committee Report Normal Rev. 22)

## Item 6 Appendix 1

Settlement	Site Name	Site Area (ha)	Total Dwellings	Reason for removal
Higham Ferrers	South of Ferrers School	7	204	Whilst there have been some recent moves to bring land currently owned by the Duchy of Lancaster forward for development, these discussions are still at an early stage. This site could be considered as a possible strategic allocation through Core Strategy Review
Higham Ferrers	Station Road/A6	3.5	100	Subject of current application for development of 115 dwellings (reference 11/00805/OUT) however at the time of the preparation of the AMR permission had not yet been granted
Oundle	Stoke Doyle Road	7.7	230	RNOTP longer term site allocation – future inclusion dependent upon both Core Strategy and RNOTP reviews
Oundle	Cotterstock Road/St Peter's Road	6.67	200	RNOTP longer term site allocation – future inclusion dependent upon both Core Strategy and RNOTP reviews
Raunds	Station Road	17.9	530	Previous Raunds Area Preferred Options proposed site allocation. Future position to be considered as part of the preparation of the Four Towns Plan
Raunds	Land East of Manor School	1.7	50	Previous Raunds Area Preferred Options proposed site allocation. Future position to be considered as part of the preparation of the Four Towns Plan
Raunds	West End, North of Brick Kiln Road	15.8	230	Subject of currently undetermined applications for development of 230 dwellings as part of mixed use development (11/01747/OUT & 11/01748/OUT)
Raunds	Darsdale Farm (Raunds South)	17.36	470	Subject of currently undetermined application for development of 460-470 dwellings (07/02238/OUT)
Rushden	Shirley Road	3.39	100	Three Towns Preferred Options proposed site allocation. Predominantly greenfield, but situated within urban area; i.e. Core Strategy Policy 9 second priority site
Rushden	Goulsbra Road	3.44	100	Subject of currently undetermined application for development of 73 dwellings (11/01023/OUT)
Rushden	John Street Car Park/Alfred St Junior School	1.14	60	Brownfield site, developable.. Development dependent upon implementation of wider Rushden regeneration proposals.
Thrapston	Springfield Farm	9.57	250	RNOTP longer term site allocation – future inclusion dependent upon both Core Strategy and RNOTP reviews
Thrapston	Washington Court	0.58	20	RNOTP longer term site allocation – future inclusion dependent upon both Core Strategy and RNOTP reviews