



Council – 11 April 2016

Future Approach to Plan Making within the District

Purpose of report

This report has been prepared to enable this council to consider the most appropriate future approach to plan making within the District in the light of recent government guidance and local progress on Neighbourhood Plans

Attachments

Appendix 1 – Local Plan proposed timetables

Appendix 2 – Additional Housing Requirements (Report presented to Four Towns Working Party on 10 February 2016)

1.0 Background

- 1.1 Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Planning decisions must be taken in accordance with the Development Plan (which includes Part 1 & 2 Local Plans, Neighbourhood Plans and Supplementary Planning Documents) unless material considerations indicate otherwise.
- 1.2 It is therefore important to ensure that local authorities progress plan making as efficiently as possible, in order to guide the future strategy for development and determine the outcome of future planning applications.
- 1.3 Good progress has been achieved in Local Plan making for East Northamptonshire. The replacement Joint Core Strategy (JCS) has been examined and has recently been subject to public consultation on further modifications (February/March 2016). Its adoption is anticipated in July 2016. The JCS (also known as a Part 1 Local Plan) provides strategic direction for East Northamptonshire, which allows for the drafting of more localised and detailed guidance through the Part 2 Local Plans (and Neighbourhood Plans).
- 1.4 Members will, however, be aware of previous delays to the JCS, which has in turn delayed plan making in East Northamptonshire in respect of the Four Towns Local Plan, as the latter takes its policy steer from the JCS. Further delays have resulted from staff changes in 2015. Despite this, the Four Towns Plan Working Party has been meeting regularly over the last year or so, considering the content of that Plan and agreeing aspects of the more detailed policy approach.

2.0 Progress of Plan Making

- 2.1 The advanced stage of the JCS has provided greater clarity in respect of the issues to be considered through the policies of the Part 2 Plans, such as the Four Towns Plan. In particular JCS policies now provide clear overall housing requirements to 2031 (policy 28), whilst the identification of land to the east of Rushden as a broad location for a sustainable urban extension of around 2000-2500 new homes with employment provision (policy 33) has provided a clearer focus on future needs for the south of the district. This clarity was not present when the Four Towns Working Party was established.

- 2.2 However it should be noted that the JCS has identified the potential for additional (non strategic) housing allocations to be made because the Rushden East SUE would not be able to deliver its full allocation within the plan period. The detail of this requirement is set out in a report which was recently submitted to the Four Towns Working Party (and is attached for information- Appendix 2). In summary the report concludes the need for some additional housing allocations to be provided in the Four Towns Plan (circa 300-400 homes) to ensure the District's overall housing requirement is met up to 2031.
- 2.3 Beyond the Four Towns Plan area there is a further need, arising from the JCS, to identify an additional requirement of around 200 homes at Oundle
- 2.4 In addition to the above, Neighbourhood Plans have been making progress across the District, with plans emerging for most of the south of the district and some areas of the northern part. Some of these Plans have sought to make allocations to assist in meeting future housing requirements. However, the Higham Ferrers Neighbourhood Plan is the only Plan to date which is close to being 'made' as part of the statutory Development Plan.

3.0 Implications of the current policy position

- 3.1 A Local Plan for the northern part of the District was adopted in 2011 (The Rural North, Oundle and Thrapston Plan- RNOTP). However, this pre-dates the Government's approach to planning laid out in the National Planning Policy Framework in 2012 and only provided for future requirements up to 2021. The replacement JCS, referred to above, projects future housing and employment requirements up to 2031 and highlights the need for additional housing provision.
- 3.2 Work on the equivalent plan for the south of the District was initially delayed because of issues with the RNOTP. In February 2014, this council resolved to continue to progress the Four Towns Plan and to leave the Rural North, Oundle and Thrapston Plan un-reviewed in the short to medium term. The alternative, that was rejected, was instead to progress with a single District-wide Local Plan, which would have provided a consistent approach but which would required more of the evidence base to be updated.
- 3.3 During the time work on the Four Towns Plan has progressed there have been saved policies which apply in this part of the District. However, upon adoption, the JCS would provide the main policy approach and the vast majority of extant saved policies across the District would be superseded. It is therefore important that Part 2 Plan(s) for the District are put in place to provide detailed development management type policies. These would benefit from a consistency in approach across the whole of the Council's administrative area. Neighbourhood Plans are being developed for a significant number of towns and parishes in the district. However, they vary considerably in their policy coverage. It is important that there is also consistent coverage of key planning policy areas across those areas without Neighbourhood Plans.
- 3.4 For these reasons it is now considered appropriate for the council to review again what now would constitute the most effective and efficient approach for delivering Part 2 Local Plan(s) for the District up to 2031.
- 3.5 There are two approaches for consideration by Members and these are laid out below. Both approaches raise 3 main issues which Members should take into account in determining the best way forward for plan making.
- 3.6 The issues to consider are:
- What are the implications for each approach
 - What are the costs associated with each approach
 - What are the timescales associated with each approach

- 3.7 The costs associated with producing a plan depend on the particular issues a plan has to consider. However, a number of key evidence bases are likely to be required to be refreshed to ensure the plan is sound and passes the test of examination. Some of this work is specialist and will cost an estimated sum of around £150,000 per plan in addition to the staff resources required to progress a plan to adoption.
- 3.8 The cost of the Planning Inspectorate conducting the examination can vary depending on the issues; a ball park figure of £100,000 would provide a reasonable assumption, based on similar experiences elsewhere.

4.0 Approach to achieving District Wide Local Plan coverage

- 4.1 The implications of each of the two options are discussed in addition to identifying the issues outlined in paragraph 3.6.

OPTION 1 DISTRICT WIDE LOCAL PLAN

4.2 Implications

- 4.2.1 The preparation of a district wide Local Plan would provide policy coverage in one (Part 2) document. The Government's preferred approach for the production of Local Plans is that an Authority produces a single Local Plan for their area. This is made clear in the National Planning Policy Framework (NPPF paragraph 153) which states that: *"Each Local Planning Authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified."*
- 4.2.2 This option would have the advantage of providing up to date and consistent policies in line with an adopted JCS across the district, contained within one plan covering the period up to 2031. Future housing/employment requirements arising, whether in the Four Towns area, or the more rural north would be more efficiently considered within a district wide plan.
- 4.2.3 A district wide plan would allow for gaps in the evidence base to be provided comprehensively. So for example an open space and playing pitch strategy would provide the same methodology, with consistent base dates across the whole of the district. Currently consultants are undertaking the open space element of this study for the Four Towns area only; further work would be required for the remainder of the district, at an extra cost.
- 4.2.4 There are other assessments and evidence bases associated with plan making that can be achieved more efficiently from a district wide approach, rather than providing through the Four Towns Plan, and then repeating for the northern part of the district a year or so later. An example of which would be the Strategic Environmental Assessment of the Plan and its policies, which requires significant consultancy input. This would need repeating for each individual plan and costs would increase accordingly.
- 4.2.5 The reliance on a Four Towns Plan to bring forward key allocations for future housing development is no longer necessary. The Rushden East Sustainable Urban Extension will be informed through a separate master planning process and additional housing allocations are being brought forward through the production of Neighbourhood Plans. Whilst work progressing on the Four Towns Plan would supplement that with greater detail, it would be unlikely to change the fundamental planning approach, particularly in relation to major planning applications. It is not therefore considered that producing a single plan will increase uncertainty in determining future planning proposals within the Four Towns area, particularly given the advance stage in preparation of the Joint Core Strategy. This leaves the focus of

the Four Towns Plan on providing detailed development management policies, which add greater detail to the strategic policies of the Joint Core Strategy. These policies should be developed District wide to achieve a coherent and efficient approach to plan making. Approaching this separately through two separate plans on differing timescales would not represent an appropriate, holistic way of achieving this. It would also need justifying in light of the Government's approach to plan making, referred to in paragraph 4.2.1

- 4.2.6 Much of the work already undertaken in respect of the Four Towns Local Plan can be incorporated into a district wide plan; the work will still have value in assisting future policy drafting, which would be informed by the replacement Joint Core Strategy.
- 4.2.7 Similarly, with governance arrangements set up to assist progress of the Four Towns Plan it would be relatively straight forward to revise the current working party arrangements in order to bring forward a plan for the whole of the district.
- 4.2.8 Further, whilst there is an adopted plan for the northern part of the District this still pre dates the publication of the NPPF. The Plan will be partly superseded by some of the policies contained in the replacement Joint Core Strategy, whilst remaining policies will need to be revised to reflect the policy requirements of the replacement Joint Core Strategy and to make any future land use allocations should these not be provided through Neighbourhood plans. This would lead to an inconsistent policy approach that requires the interpretation of different sets of policies to help determine future planning applications.

4.3 Costs

- 4.3.1 A district wide plan would only require a single examination as opposed to a further examination being required in the next five years if the Four Town Plan is pursued in advance of providing District wide coverage. Likewise having a single district wide plan would eliminate the need to refresh the evidence bases twice.
- 4.3.2 The estimated costs for a district wide plan are as follows:

Area of Activity/Cost	Estimate (£ 000's)	Financial Year(s)
Evidence Base Review	150	16-17
Consultation, printing and publication	2	16-17
	2	17-18
	2	18-19
Examination	100	18-19
TOTAL	256	

- 4.3.3 A further advantage of undertaking a district wide plan is that resource assistance through the Joint Planning Unit may assist in off setting some of the costs associated with plan production. In particular the ability to share evidence base/consultant fees with the North Northamptonshire Councils in a more co-ordinated way. This would require consistency in respect of the approach to the Part 2 Local Plans within each Authority. However, given the potential adoption of the JCS in the summer, each Authority should be progressing along similar timelines and of course working to the same plan period. Initial discussions reveal councils within North Northamptonshire to be operating on similar timelines for taking forward Part 2 Local Plan, which would provide the potential for some efficiency savings in engaging consultants for particular parts of the work.

4.4 Timescale

- 4.4.1 Local Plan production is resource intensive. The production of a Plan will usually take 2-3 years to enable the provision of evidence, drafting of policy and consultation on issues/modifications, as well as undergoing independent examination. Appendix A provides a timetable for potential plan delivery. Whilst it would take slightly longer to deliver a district wide local plan as opposed to providing part coverage through a Four Towns Plan, district wide coverage would be provided more quickly through producing a single plan.

OPTION 2 FOUR TOWNS PLAN AND REMAINDER OF THE DISTRICT LOCAL PLAN

4.5 Implications

- 4.5.1 Significant progress has been made in respect of the Four Towns Plan with the structure/content of the Plan agreed through the Four Towns Working Party, drafting of policies and text has commenced and work is near to concluding on the evidence base. However, the Regulation 18 consultation took place back in 2012, this will need to be refreshed (which will involve further consultation) and there is still major work to be undertaken to enable a draft plan to be published for consultation purposes and submitted for examination. In addition there are fundamental changes to the planning process, proposed through Government consultations (which have been reported to Members) and which will need to be taken into account once the Housing and Planning Bill receives Royal Assent.
- 4.5.2 The NPPF requires plans to be drawn up over an appropriate timescale, with a preferred 15 year time horizon. Producing a Part 2 Local Plan for the northern part of the District, after adoption of the Four Towns Plan would fall short of this requirement.
- 4.5.3 Continuation of the Four Towns Plan would also assist in providing more detailed policy guidance in a shorter timescale, for example the defining of town centre boundaries, setting local impact thresholds, providing an approach to the designation of green space and addressing local design issues.

4.6 Costs

- 4.6.1 The estimated costs for the continuation of the Four Towns Plan only plan are as follows:

Area of Activity/Cost	Estimate (£ 000's)	Financial Year(s)
Evidence Base Review	50	16-17
Consultation, printing and publication	2 3	17-18 18-19
Examination	100	17-18
TOTAL	155	

4.7 Timescale

- 4.7.1 Continuation of the work on the Four Towns Plan (set out through a clear delivery programme in a revised Local Development Scheme) is likely to provide a timetable that would be capable of delivering a plan to examination by January 2018 (See Appendix 1). However a shorter delivery timescale has clear implications for overall plan making aspirations, without any significant overall benefits, when assessed against the merits of providing policy coverage through a single, District wide plan.

5.0 Conclusions

- 5.1 The Council is in a relatively good position in terms of plan making and is on course to adopt its Part 1 Plan later this year. This would meet the Government's proposed requirement for all Local Planning Authorities to have a local plan in place by 2017.
- 5.2 The Government further expects local plans to be kept up to date and relevant, particularly in areas where there is high housing pressure. The drafting of a District wide plan will assist this Council in meeting these proposals.
- 5.3 Whilst there are some benefits to be gained from continuing to produce a Local Plan for the Four Towns area, there are significant benefits in now changing to the production of a single plan for the whole of the district. This will allow a more consistent approach to policy making and provide a shorter, more cost effective approach for overall district wide plan coverage.
- 5.4 Whichever approach is taken forward the Council will be required to update its Local Development Scheme (LDS). The LDS essentially sets out the documents to be produced and key milestones for delivery. Appendix A provides a draft timetable of potential delivery, which would be required to be drawn up formally through a published Local Development Scheme once a preferred option has been agreed and there is certainty provided in respect of the adoption of the JCS. The revision to the LDS will be reported to Planning Policy Committee as a separate report in due course.

6.0 Equality and Diversity Implications

- 6.1 The production of a Local Plan document requires a comprehensive analysis of its policies to assess any impacts on issues of equality.

7.0 Legal Implications

- 7.1 The requirements for producing a Local Plan are laid out in Planning Regulations. Specifically through the Town and Country Planning (Local Planning) (England) Regulations 2012.

8.0 Risk Management

- 8.1 Risks associated with each of the options are outlined in the report under the implications sub headings. All risks related to this project would be entered into the Risk Register and monitored by the relevant working party. The project timelines attached as Appendix A would also be dependent on contractual agreement with the Planning Inspectorate to resource the examination as indicated.

9.0 Resource and Financial Implications

- 9.1 Local Plan Documents are resource intensive and take around 2-3 years to reach adoption. The main costs associated with preparation are the evidence base and the examination process. Potential cost implications for each of the two options to reach district wide coverage can be summarised as follows:

Option 1 – start district wide Plan now	£ 000's	Option 2 – Continue with Four Towns Plan and the consolidate into single district wide Plan	£000's
Evidence Base	150	Complete 4TP Evidence Base	50
Consultation, Printing and Publication and Printing	6	Consultation, Printing and Publication and Printing	5
Examination	100	4TP Examination	100
		Update district wide Evidence Bases	150
		Consultation and Printing	5
		Examination for district wide Plan	100
TOTAL	256	TOTAL	409

There is currently £53,600 pa in the Planning Policy budget for plan-making.

10.0 Constitutional Implications

10.1 It should be noted that option 1 would require re-designation of the Four Towns Local Plan Working Party and its accompanying terms of reference.

11.0 Customer Service Implications

11.1 Whilst both options would provide benefits in providing a clear policy steer for assessing future planning applications that impact on communities, option 1 would have a greater overall benefit in that it would provide up to date and robust planning policies for all of the District's communities.

12.0 Corporate Outcomes

12.1 The preparation of a Local Plan is a comprehensive project, and is anticipated to have an impact on most of the Corporate Plan outcomes as follows:

- Good Quality of Life – for example through policies relating to design
- Effective Partnership Working – Local plan preparation involves close partnership working with a wide variety of stakeholders to inform the evidence base.
- Value for Money- option 1 would provide a more efficient approach in respect of overall costs of achieving district wide plan coverage.

13.0 Recommendation

- 13.1 That approval be given to option 1 (producing a single plan) as the most appropriate and cost efficient way forward for Plan Making in East Northamptonshire.

(Reason – This option provides the most efficient and cost effective approach for taking forward plan making in East Northamptonshire)

Legal	Power: Town and Country Planning (Local Planning) (England) Regulations 2012				
	Other considerations:				
Background Papers: None					
Person Originating Report: Richard Palmer Planning Policy and Conservation Manager ☎ 01832 742142 ✉ rpalmer@east-northamptonshire.gov.uk					
Date: 23/03/2016					
CFO		MO		CX	

Local Development Scheme

Local Plan: Part 1																																																
	A	M	J	J	A	S	O	N	D																																							
Core Strategy				*																																												
Local Plan: Part 2													2017												2018												2019											
	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A							
Four Towns Plan Option 2				*		2	2			*	3	3		*	4	4									*	5	5				*																	
Subsequent consolidation of 4TP and RNOTP into single District Plan																																					Option 2 Estimated time scale for complete policy wide cover: Mar 22											
District wide site specific DPD - Option 1	*	1	1				*	2	2					*	3	3					*	4	4										*	5	5								*					

KEY:

	Informal/ preliminary discussions and evidence gathering and/or consultation or examination administration
*	Requires ENC agreement at Planning Policy Committee/ Council as appropriate
	Formal/ statutory public consultation
1	Regulation 18/ Issues and Options consultation (statutory)
2	Preferred options/ preliminary draft plan text
3	Regulation 20/ Pre-submission draft plan consultation (1st draft)
4	Regulation 20/ Pre-submission draft plan consultation (2nd draft: Focused Changes)
5	Regulation 20/ Pre-submission draft plan consultation (3rd draft: Proposed Main Modifications)
	Pre-Submission agreed
	Submission to Secretary of State

	Pre Hearings Meeting
	Examination Hearing Sessions
	Receipt of Inspectors Report
	Adoption of DPD

S	O	N	D
to adoption- age Oct 18-			



Four Towns Plan Working Party 10 February 2016

Joint Core Strategy Housing Delivery Requirements for the Part 2 Local Plan

Purpose of the report

This report highlights the remaining new housing development requirements for the purposes of East Northamptonshire's Part 2 Local Plan in relation to the latest version of the North Northamptonshire Joint Core Strategy 2011 to 2031 (February 2016 – Proposed Main Modifications to the Submitted Plan).

1.0 Context

- 1.1 Following an Examination in Public in November 2015, the Proposed Main Modifications to the Submitted North Northamptonshire Joint Core Strategy 2011 to 2031 (JCS) were published on 3rd February 2016, and are subject to a six week public consultation period which closes on 16th March 2016.
- 1.2 Subject to representations from the consultation, it is envisaged that the JCS can be formally adopted as the Part 1 Statutory Local Plan for North Northamptonshire in July 2016. This report focuses on the new housing delivery requirements as set out in this latest version of the JCS.
- 1.3 The JCS sets discrete housing delivery requirements between 2011 and 2031 for each of the six urban areas within the District, and for rural housing (JCS Policy 29 / Table 5 – see JCS pages 136 to 140).
- 1.4 For East Northamptonshire, JCS Table 5 states that the housing requirement for the period from 2011 to 2031 is as follows:

East Northamptonshire Total		8,400
Growth Town	Rushden	3,285
	Higham Ferrers	560
	Irthlingborough	1,350
	Raunds	1,060
	Thrapston	680
	Oundle	645
Rural Housing		820

2.0 Housing requirements – urban areas

- 2.1 In the case of Higham Ferrers, Irthlingborough, Raunds and Thrapston, the entire JCS requirement for 2011-2031 has already been met; by way of completions, existing commitments (planning permissions, resolutions to grant and/ or development plan allocations), specific brownfield sites and specific emerging development plan allocations (Land East of Ferrers School and Rushden East).
- 2.2 For Rushden and Oundle, residual requirements have been identified. The following approaches have been considered for addressing these outstanding residual requirements through the Part 2 Local Plan:

1. Rushden:

- a) Preparation of the Part 2 Local Plan on the basis that as 2,500 dwellings are to be allocated at Rushden East, there is sufficient land committed to meet the JCS requirement; consequently no need to consider any further Rushden allocations;
- b) Application of the flexible approach, set out in JCS paragraph 9.11, which would entail the allocation of an additional 363 dwellings (~360 dwellings) at Rushden, in addition to 1,600 dwellings at Rushden East;
- c) In recognition of Rushden's Growth Town status, the Part 2 Local Plan ought to deliver at least 3,285 (~3,300) dwellings at Rushden, in which case the Plan would need to allocate further housing sites to accommodate an additional 646 dwellings (~650 dwellings) at Rushden, in addition to 1,600 dwellings at Rushden East.

2. Oundle:

- a) Assumption that the Oundle Neighbourhood Plan will progress during 2016/17, including allocating land for an additional 208 dwellings (~210 dwellings) at the town.
- b) Assumption that the Oundle Neighbourhood Plan is unlikely to come forward during the foreseeable future, therefore the Part 2 Local Plan will need to make provision for an additional 208 dwellings (~210 dwellings) at the town.

- 2.3 It is recommended that approaches 1b) and 2a) above are the most appropriate options for Rushden and Oundle respectively. However, the position will need to be monitored carefully with regard to progress with both the Rushden East project and the emerging Oundle Neighbourhood Plan.

3.0 Housing requirements – rural areas

- 3.1 The JCS includes a rural housing delivery requirement of 820 new dwellings (between 2011 and 2031). This equates to an average of 41 new dwellings per year split between over 50 villages across the District. Consideration needs to be given to whether rural housing site allocations will be needed.

3.2 Two methodologies – apportionment by the gross (2011 to 2031) and net/ residual (2015 to 2031) rural requirements – have been considered. These alternative approaches are summarised as follows:

- a) Apportionment of JCS gross rural requirement by population (820 dwellings, 2011 to 2031), whereby an indicative quantum of development may be identified for each village over the Plan period, ranging between 5 dwellings (smallest villages, <150 population) and 80 dwellings (largest village; Stanwick); or
- b) Apportionment of JCS net/ residual rural requirement, whereby provision for a further 220 dwellings would need to be made to cover the remainder of the Plan period 2015-31.

3.3 It is recommended that approach b) (above) is the more appropriate option.

Prepared by Mike Burton, Senior Planning Policy Officer (10 February 2016)