Purpose of report

This report considers the policy implications arising from the representations submitted on the draft Local Plan in respect of Chapter 8 – Housing Delivery. It proposes whether or not additional changes will be required to the draft Plan and where additional evidence is required to address any issue arising.

Attachments:

Appendix 1: Section 8.0 Housing Delivery (Housing Requirements – paragraphs 8.1-8.22)
Appendix 2: Section 8.0 Housing Delivery (Housing Mix and Tenure/ Specialist Housing – paragraphs 8.38-8.76)
Appendix 3: Housing requirements for the Local Plan Part 2 (Urban)
Appendix 4: Housing requirements for the Local Plan Part 2 (Rural)

Recommended responses to the draft Local Plan representations (appendices 1 and 2) are available through the following links: https://www.east-northamptonshire.gov.uk/meetings/meeting/964/planning_policy_committee

1.0 Background

1.1 The council is progressing its Local Plan Part 2, which aims to provide more detailed local planning policy guidance, to support the strategic policy direction set out in the North Northamptonshire Joint Core Strategy (adopted in July 2016 – with a plan period up to 2031) and to provide for the outstanding strategic allocations set out in that Plan. The draft East Northamptonshire Local Plan Part 2 was approved for public consultation from 2nd November 2018 to 17th December 2018, though an extension of time to 18th February 2019 was subsequently agreed to allow additional representation to be submitted in respect of the Oundle site assessment evidence.

2.0 Draft East Northamptonshire Local Plan Part 2 Representations

2.1 Previous reports to the Planning Policy Committee have provided the Committee with the representations received from the various sections of the Local Plan. This report provides a response to those representations submitted in relation to the Housing Delivery section (8.0) of the Plan. However, those representations relating specifically to the strategic housing site allocations at Oundle (Policies EN24 to EN27 and associated supporting text) are not considered as part of this report. Those representations will be considered at a separate, forthcoming meeting of the Committee.
2.2 This report follows the same format of previous reports, with the intention of providing a clear steer in respect of policy direction for the pre submission plan, setting out the implications of the submitted representations, including whether changes are required to the draft plan before it can be prepared for pre submission.

2.3 As with the recent Local Plan reports brought to the Planning Policy Committee, hyperlinks are provided to enable access to spreadsheets setting out the proposed officer responses to the representations submitted.

2.4 In summary, potential outcomes are considered in terms of three categories:
- No further changes required
- Proposed changes to text and/or policies
- Additional evidence required to determine whether amendments are required to address the representation.

2.5 Appendices 1 and 2 set out the officer responses for section 8.0 of the Local Plan. Appendix 1 addresses the outstanding housing requirements (i.e. housing figures); paragraphs 8.1-8.22 of the draft Plan (including Policy EN23). Appendix 2 addresses policies and supporting text regarding Housing Mix and Tenure/ Specialist Housing; paragraphs 8.38-8.76 (including policies EN28-EN32).

3.0 Housing requirements

3.1 The first part of the Housing Delivery section of the Local Plan, regarding the housing requirements (paragraphs 8.1-8.22), is accompanied by supporting background papers for urban and rural areas (appendices 3 and 4, respectively). These two papers relate to the current housing land supply position, as at 1st April 2018 (2018 Authorities' Monitoring Report1).

3.2 These background papers will form part of the published evidence base for the Local Plan. In addition to the Officer responses to the submitted representations (appendices 1 and 2) they provide the detailed evidence base, underpinning paragraphs 8.5-8.14 of the draft Local Plan.

3.3 Urban areas (Appendix 3)
The background paper identifies that the housing requirements for Higham Ferrers, Raunds and Thrapston has already been met by way of completions, existing commitments (planning permissions and site allocations) and emerging sites (by 231, 92 and 77 dwellings respectively). By contrast, outstanding requirements are identified for Rushden, Irthlingborough and Oundle (113, 288 and 242 dwellings respectively).

3.4 In the case of Rushden and Irthlingborough, shortfalls have arisen due to slippages and delays to the trajectories for the two sustainable urban extensions (Rushden East and Irthlingborough West). For Oundle there is an outstanding requirement, which the draft Plan proposed be met through the allocation of three additional greenfield sites. This paper has considered, in turn, the circumstances for Rushden, Irthlingborough and Oundle, in order to identify an appropriate approach for each to manage housing delivery over the remainder of the Plan period.

3.5 Through the assessment, the background paper recommends that the Local Plan could apply the following approaches to housing delivery:

- **Rushden** – No need to allocate further housing land to meet the small identified residual requirement (113 dwellings), given that any permission for Rushden East would bring 2,700 dwellings into the housing land supply in its entirety exceeding the JCS requirement by 1,287 dwellings, and furthermore could be offset by over-provision (over 230 dwellings) at Higham Ferrers;

- **Higham Ferrers** – No need to allocate further housing land in the Local Plan Part 2, as the current housing land supply exceeds the JCS requirement by 231 dwellings;

- **Irthlingborough** – No need to allocate further housing land to meet the identified residual requirement (288 dwellings), given that the JCS requirement (1,350) was inflated by over 500 dwellings above the baseline requirement, itself predicated upon delivery of Irthlingborough West (700 dwellings) in its entirety within the current Local Plan period;

- **Raunds** – No need to allocate further housing land in the Local Plan Part 2, as the current housing land supply exceeds the JCS requirement by 92 dwellings;

- **Thrapston** – No need to allocate further housing land in the Local Plan Part 2, as the current housing land supply exceeds the JCS requirement by 77 dwellings;

- **Oundle** – Allocation of further housing land in the Local Plan is necessary, in order to address a minimum shortfall of 242 dwellings.

3.6 **Rural areas**

As at 1st April 2018, the housing rural housing requirement was already met, in the form of completions, existing commitments (planning permissions and site allocations) and emerging sites (e.g. Neighbourhood Plan site allocations). Therefore no further rural housing land allocations would need to be made in the Local Plan.

3.7 However, Neighbourhood Plans could allocate further housing sites if there is a local desire to do so. Similarly, future rural exceptions housing schemes and/ or small scale rural windfall or infill developments could continue to deliver rural housing for the entire duration of the Plan period.

4.0 **Next Steps**

4.1 A forthcoming meeting will provide the opportunity to complete this series of reports in covering the remaining outstanding representations from the Housing Delivery chapter, regarding Oundle and contingencies (paragraphs 8.23-8.37, including policies EN27-EN27).

4.2 Agreement of the actions proposed will allow officers to revise the text/policies of the draft Local Plan, taking into account the completed set of evidence based documents. The revisions will be consolidated into a ‘Pre-submission’ version of the Local Plan Part 2 which, following approval by the Planning Policy Committee, will be subject to a statutory six week consultation period in advance of formal submission to the Planning Inspectorate for Examination.
5.0 **Equality and Diversity Implications**

5.1 The preparation of the Local Plan Part 2 document requires a full Equality Impact Assessment. This is particularly important in relation to the required consultation processes for the draft Local Plan. This will be submitted to the Secretary of State as part of the evidence base for the Plan.

5.0 **Privacy Impact Implications**

5.1 No detailed issues arising at this time. All representations submitted by private individuals to the draft Local Plan Part 2 consultation process have been redacted for publication on the East Northamptonshire Council website to ensure that personal information is not published with the representations made.

6.0 **Legal Implications**

6.1 There are no legal implications arising from the report. The consultation on the draft Local Plan Part 2 (2\textsuperscript{nd} November 2018 – 18\textsuperscript{th} February 2019), to which this report relates, was not a statutory part of the plan-making process.

7.0 **Risk Management**

7.1 The main risks in preparing the district-wide Local Plan Part 2 are:

- Maintaining progress to ensure that key stages are met to enable the Local Plan to proceed as soon as possible to examination and adoption. This will be mitigated by weekly project management and reporting procedures.
- Ensuring the availability of sufficient resources to enable the Local Plan preparation process to proceed efficiently. Sufficient staff resources are available.
- Ensuring that the Local Plan satisfies the tests for examination, namely that it has been positively prepared, is justified, is effective, and is consistent with national policy.

7.2 The main risks of failing to prepare the district-wide Local Plan Part 2 in a timely manner are:

- The lack of an agreed local planning policy framework for determining development proposals and for demonstrating the council’s five year housing land supply could lead to a risk of unwanted development.
- Development being allowed on appeal on sites that the council and communities have not agreed. This also brings the potential of costs being awarded against the council with regard to planning appeals and public inquiries.
- Poorer outcomes from future planning applications that fail to deliver local policy guidance and aspiration.
- A lack of up to date planning policy for the East Northamptonshire area in the transition to potential unitary local government for North Northamptonshire.

8.0 **Resource and Financial Implications**

8.1 In addition to existing staff costs, the main costs in the preparation of a district-wide Local Plan Part 2 relate to the completion of the evidence base and funding the independent examination process, which is undertaken by the Planning Inspectorate, supported by a programme officer.
8.2 The cost of producing the evidence base is covered by existing budgets. Provision of approximately £75,000-£100,000 is expected to be required in 2019/20 for the cost of the Examination process. An estimate for this has been factored into the 2019-20 budget and was approved by Council on 4th March 2019.

9.0 Constitutional Implications

9.1 None arising from this report.

10.0 Implications for our Customers

10.1 The adoption of a district-wide Local Plan Part 2 will ensure that the council, and its successor council, will have a clear and up-to-date statutory planning policy framework to inform decisions on planning applications which take into account the needs of local communities, particularly in respect of availability of housing, employment and community infrastructure.

11.0 Corporate Outcomes

11.1 The preparation of a District-wide Local Plan Part 2 will, in particular, deliver the following Corporate Plan outcomes:

- Good Quality of Life: Maintenance or improvement of healthy and safe lifestyles through sustainable development via policies relating to landscape, green infrastructure, and design.
- Effective Partnership Working: District-wide Local Plan Part 2 preparation involves close partnership working with a wide variety of stakeholders to inform the evidence base.
- Effective Management: Fulfilling legal requirements and maximising the effectiveness of the planning service.

12.0 Recommendation

12.1 The Committee is recommended to:

1) Approve the actions recommended in respect of paragraphs 8.1-8.22 (Housing Requirements), 8.38-8.76 (Housing Mix and Tenure/ Specialist Housing) and associated policies (EN23, EN28-EN32) of the draft Plan, to allow further work to be undertaken to produce a sound plan for pre-submission (appendices 1 and 2).

2) Note the findings of the urban and rural housing background papers (appendices 3 and 4), to allow these to be published as part of the supporting evidence base for the Local Plan Part 2.

(Reason – to ensure that the draft Local Plan is properly prepared and supported by a robust evidence base to allow a pre-submission draft to be considered for public consultation).
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| Background Papers: | None |

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