

Risk	Consequence of failure to manage risk	Review observation	Evidence reference	Status	Improvement opportunities
Housing objective; To propose the preferred site or sites for future residential development in Oundle in light of the requirements of the Core Strategy Review.					
H1. No process is in place to allocate housing.	Allocation is arbitrary or inconsistent and open to challenge.	Doc 5 (p48) summarises the process that has been used. It is based on the methodology produced for Oundle by Maroon Planning (doc 7). The adjustments to suit Oundle are listed (doc 4 part 4, part 5).	Doc 4 part 4, part 5 Doc 5 Doc 7		
H2. Process used does not use industry best practice.	Process is sub-optimal and open to challenge.	Relevant 'Industry best practice' elements are incorporated in the process: - the approach is in accordance with Para 042 of the NPPG and shadows the work undertaken in preparation of the JCS, including the use of the JCS sustainability criteria as the basis of the framework - the site assessment methodology uses both a quantitative and a qualitative assessment - the quantitative assessment uses a matrix to assess the suitability and developability of sites whilst the qualitative assessment enables sites to be assessed against the objectives of the Plan; the community benefits offered by site promoters; and the communities views regarding sites proposed for development.	Doc 4 Doc 5 Doc 7		
H3. Process is not transparent nor is it adequately documented	Lack of clarity could result in challenge	There is no narrative to explain the rating for the quantitative assessment, in addition some elements have been left blank. The qualitative assessment has not been completed. (Doc 4 part 2 pp1-9). Separately, a series of qualitative statements have been captured (doc 2) but it has not been made clear how these have been used. In doc 5 pp23-48, reference is made to the SHLAA report ratings but there is no indication as to how this information is taken into account in the assessment process. In addition it is noted that some sites do not have a SHLAA rating. There is no clarity on how the objectives and policies (doc 5 pp16-18) have been used in the final decision making process. There is no apparent linkage between doc 5 pp23-48 and the information in doc 2. The decisions on the type and number of houses proposed for each site are described in doc 5 pp44-48. However, much of the decision making process and weighting applied to different factors has to be inferred. Whilst the outcome may be the best for Oundle on based what has been documented it will be difficult to communicate and stakeholders may mount a challenge. A set of Neighbourhood Planning Policies are set out in doc 5 pp16-18. Although they do not appear to have had a material impact on the housing allocation outcome, it is believed that by stating them here, there is a risk that the housing allocation process may be undermined on the basis of pre-determination. If the policies are found to be valid and appropriate, they could be proposed and adopted after completion of the housing allocation exercise. A suitable process to allocate housing in the context of a Neighbourhood Plan might be based on the following structure: 1. Introduction and objective. 2. Rationale for proposed housing number and mix. 3. Policy background. 4. Site identification process including call for sites. 5. Consultation results - from developers, public etc. 6.1 Site assessment matrix (sustainability/development) suitably adapted for Oundle. 6.2 review and finalisation of objectives so that a qualitative assessment can be made to determine the housing allocation outcome for each site 7. Conclusions 8. Communication and consultation plan	Doc 2 Doc 4 part 2 pp1-9 Doc 5 pp16-18, pp23-48		In order to support communication with stakeholders, the whole process should be described in one document location. Currently the core of the process is contained in doc 5 (p48-55) but other steps are identified explicitly or by practice elsewhere. The document should include a rationale of why the process used has been adopted (and cross referred to National Policy and Guidance). (See Final Report Recommended Action 1) Similarly, once the assessments have been completed and all of the criteria incorporated, the results should be captured in one document location. This will make it easier to demonstrate application, consistency and help communication with stakeholders. (This document can then be sent to statutory/other consultees to ask them to confirm their agreement, used as a basis for feedback to landowners/developers in order to demonstrate that the work has been conducted in an equitable and thorough basis and finally to facilitate consultation with the community.) (See Final Report Recommended Action 2) There is no process in place to manage contribution by working party members who have an "interest" in the outcome of key decisions. The process should include a register of decisions where the contribution of working party members to the finalisation of key decisions has been restricted. (See Final Report Recommended Action 3)
H4. Process has not had regard to Government policy and guidance	The NP does not meet the basic conditions. Potential for challenge and NP rejected or modified	Government policy and guidance as set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) have been incorporated in the process.	Doc 4 part 4, part 5 Doc 5 Doc 7		

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H5. Process has not had regard to the need to contribute to the achievement of sustainable development	The NP does not meet the basic conditions. Potential for challenge and NP rejected or modified	This has been incorporated into the process.	Doc 4 part 4, part 5 Doc 5 Doc 7		This risk is effectively managed provided the process is followed and the results effectively documented.
H6. Outcome is not in general conformity with the strategic policies of the Development Plan	The NP does not meet the basic conditions. Potential for challenge and NP rejected or modified	Proper attention is given to the way in which housing targets (number and type) for Oundle have been determined and continue to develop (doc 5 pp1-23). The number and type to be used for the purpose of the Oundle NP is also set out (doc 5 pp44-48) - although as has already been highlighted (risk H3), some of the assumptions require clarification. Similar figures are stated in doc 2 p3. It is important that additional local level justification is included in the evidence base of the Plan stating why the housing figures in the emerging JCS are appropriate, referring to the evidence supporting the JCS where necessary. As the JCS is not adopted it is not robust to simply refer to the draft housing figure for Oundle as a done deal.	Doc 2 p3 Doc 5		A table should be included in the documentation to indicate the number and type of houses to be built from 2021 and 2031, drawing on the evidence that currently supports the JCS, together with confirmation that these targets are supported by ENC.
H7. Process used not relevant for Oundle. Not aligned with housing and the other NP objectives.	Local needs and aspirations are not taken into account. Conflicts and inconsistencies manifest in the NP.	<p>There are two parts to managing this risk:</p> <ol style="list-style-type: none"> 1. Full completion of the sustainability/developability matrix for each site. 2. Incorporating qualitative factors to ensure that the right answer for Oundle is formulated as opposed to an answer that is right. The objectives form the principle framework within which to frame this qualitative review. <p>The documentation contains multiple versions of the objectives which differ from those provided within the scope paper. It is entirely appropriate that the objectives change from the initial launch of the NP through to the preparation of the version of the NP that is submitted for external examination. Objectives will be adjusted as the working parties gather and examine evidence and in addition there will be impact from one work stream to another as a result of their separate objectives as well as feedback from consultation exercises.</p> <p>There is no clear set of final objectives. The objectives may be supported by statements of key elements of stakeholder feedback. Together this will form the framework for the qualitative assessment which leads to the final allocation outcome. If this is done, it will become clear that the output from consultation has been taken into account in arriving at the final assessment outcome</p>	Doc 2 Doc 5 Doc 10 Doc 11		<p>The final set of objectives plus any factors which will/will not be used from consultation exercises should be documented. The work streams should first confirm that their evidence papers are coherent with all of these objectives. Finally the NPWP should confirm that the complete suite of objectives are adopted.</p> <p>This allows demonstration that the results of the consultation exercise have been taken into account. (See Final Report Recommended Action 4)</p>
H8. Process not applied consistently.	Allocation is arbitrary and open to challenge.	<p>It has already been identified that there are gaps in the way that the process has been described and completed. Actions have been proposed under risk H3 to remedy these gaps.</p> <p>On the basis of evidence supplied, no evidence was found of the work being done inconsistently. However, it has already been highlighted that the current documentation is not sufficient to demonstrate to all stakeholders that the process has been executed consistently.</p>			See risk H3
H9. Not all potential development sites are considered.	Challenges made on the basis of exclusion or misalignment with developer aspirations.	Sites have been identified through a combination of a review of the up-to-date SHLAA, other historical documents and a further call for sites (CFS). This is sufficient to ensure that all sites have been considered.	Doc 5		
H10. Adjacent parishes not engaged or their intentions not understood.	Development takes place just outside Oundle NP boundary in conflict with Oundle aspirations.	No evidence has been supplied to indicate how this risk is being managed. The impact of sites and homes outside of Oundle NP area should also be considered during the site assessment.			Ensure that local parishes are consulted at the same time as all other statutory consultees and stakeholders to ensure their rightful engagement with the process. (See Final Report Recommended Action 5)

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H11. Developers/land owners not engaged in the process.	No win win optimisation. Potential for challenge and conflict.	There is evidence that landowners/developers have been involved in the process, down to the level and type of development to be provided on each site (doc 2, doc 5 pp23-28). It is important that landowners/developers have been given an equitable opportunity to put their case forward in the event that their site is inherently sustainable and suitable. It is understood that part of the reason for this review is that one particular landowner/developer feels disenfranchised due to a missed opportunity to meet and discuss their site. The key question to be asked in this instance is whether this unduly prejudiced the likelihood of their site being put forward as a preferred location for growth.	Doc 2 Doc 5 pp23-28		A clear record of when landowners/developers were approached, what they were asked to do, whether they responded and what response was given will be important to demonstrate consistency and fairness. This will begin with the format of the CFS, a long list of the responses received, a reason for the creation of the initial shortlist (i.e. sites under X ha or with a yield of X homes were discounted) and an understanding of how those retained on the shortlist were further engaged in the process. If a gap in engagement is identified that is the fault of the NPWP and it has prejudiced the case for a particular site, then recovery work and a further meeting with the landowner may be required. (See Final Report Recommended Action 6)
H12. Residents not engaged in the process.	Residents don't support outcome. Potential for challenge and conflict and increased risk of rejection of the NP at the referendum stage.	Residents have been engaged in the process to date through consultation on the ONP Questionnaire. However, the way in which this feedback is used in the assessment process needs to be made clearer.	Doc 2 Doc 5		See recommendations under risk H3 and risk H7.
H13. Local planning authority and other consultation bodies not engaged in the process.	Potential for challenge and conflict.	There is a general expectation that all statutory consultees will be approached to give their view on each site from their own professional perspective. Unfortunately it is not guaranteed that all will respond. It is noted from the doc 4 part 3 that the response of Anglian Water has been received - why only them? Similar requests/responses would be expected from statutory and other consultees e.g. Natural England, Environment Agency, Historic England and NCC Highways.			A record should be maintained of how statutory bodies have been engaged, the feedback received and how it will be used to modify the NP proposals. (See Final Report Recommended Action 7)
H14. Outcome is not compatible with EU obligations (i.e. Strategic Environmental Assessment and Habitat Regulations Assessment)	Potential for challenge and NP rejected or modified	Plan proposals must be assessed to determine whether the Plan is likely to have significant adverse effects on the environment or on a European site (also known as a "Natura 2000" site) including Special Protection Areas (SPA). These processes are referred to as Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) respectively. The application of these processes can result in the need to introduce mitigation measures in respect of particular sites or, in some circumstances, may prevent development. Ideally, these processes should be embarked upon once the sites that are likely to be included in the Pre-Submission Plan are known.			Seek advice from ENC on their preferred approach to SEA/HRA. (See Final Report Recommended Action 8)
H15. Type, tenure and number of proposed houses do not align with the Development Plan.	Potential for challenge and NP rejected or modified	Covered by risk H6 and recommended action.	Doc 2 p3 Doc 5		

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H16. Process for determining the quantum of development on each site is not explicit	Potential for challenge and conflict.	Covered by risk H3 and recommendation actions.	Doc 2 Doc 4 part 2 pp1-9 Doc 5 pp16-18, pp23-48	Green	
H17. Conclusions of the allocation process are not clearly explained	Potential for challenge and conflict.	See risk H3, risk H6 and risk H7.	Doc 2 Doc 3 Doc 4 part 2 pp1-9 Doc 5 pp16-18, pp23-48	Red	Whilst the appropriate steps may have been taken, the fragmented nature of the documentation will make it difficult to communicate and easy to challenge.

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Green Spaces objective; To safeguard existing views and green spaces and, where possible, provide additional or enhanced green space as part of new developments.					
G1. No process is in place to identify new and maintain existing green spaces.	Allocation is arbitrary or inconsistent.	There is no process in place.	Doc 1		See risk G2 and recommended action.
G2. Process used does not use industry best practice.	Process is sub-optimal and open to challenge.	<p>There is no process in place.</p> <p>The current Green Space paper contains no reference to the NPPG.</p> <p>A process to assess and protect Local Green Space would be expected to follow the guidance set out in paras 76-78 of the NPPF and the general guidance in the NPPG. The following steps (from the NPPF) should occur:</p> <ul style="list-style-type: none"> - Identification of areas of local green space in the town that are of importance to the community. This would most likely be an output of consultation. - The identified green spaces will then be assessed against the criteria identified in paragraph 77 of the NPPF. This should be done as part of a standard proforma. The green spaces should be assessed and qualified against the following criteria: <ul style="list-style-type: none"> * That the space is in reasonably close proximity to the community it serves; and * It is demonstrably special to the community by way of its beauty; and/or its historic significance; and/or its recreational value; and/or its tranquillity; and/or its richness of wildlife; and * The spaces concerned is not a significant tract of land. - There is also a requirement in the NPPG to ensure that landowners of the proposed green space are consulted on the proposal to protect it. <p>This process should be documented and assessed on a consistent basis similar to the outcomes of the housing sites assessment.</p> <p>The NPPF only sets out ways in which to protect existing local green space. If new green space is to be created (for a cemetery, allotments, recreation etc) then the way in which this will be identified and justified needs to be set out in the process.</p>	Doc 1		<p>A process should be developed that allows green spaces to be robustly identified and then their inclusion in the plan justified.</p> <p>Currently the review of the external factors is comprehensive but this has not been translated into a set of targets for Oundle. These targets can then be tested against the current inventory and proposals made to fill any gaps. the proposals would be refined based on the objectives elsewhere in the NP and quantified feedback from residents and other stakeholders.</p> <p>(See Final Report Recommended Action 9, 10, 11)</p>
G3. Process is not transparent nor is it adequately documented	Lack of clarity could result in challenge	There is no process in place.	Doc 1		See risk G2 and recommended action.
G4. Process has not had regard to Government policy and guidance	The NP does not meet the basic conditions. Potential for challenge and NP rejected or modified	Government policy is considered but not converted into a process.	Doc 1		See risk G2 and recommended action.

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G5. Process has not had regard to the need to contribute to the achievement of sustainable development	The NP does not meet the basic conditions. Potential for challenge and NP rejected or modified	There is no process in place. This is an important consideration, however, and will see this process dovetail with the housing site assessment process to an extent. It is noted that some of the proposals may seek to designate parts of the proposed housing sites as green space. In which case it is doubly important that the preferred housing sites that are promoted in the plan are deliverable, suitable and sustainable to ensure that any green space designations are not simply constraining housing supply in the town.	Doc 1		See risk G2 and recommended action and ensure that there is linkage to the housing objective work.
G6. Outcome is not in general conformity with the strategic policies of the Development Plan	The NP does not meet the basic conditions. Potential for challenge and NP rejected or modified	The definition of the outcomes is not yet sufficiently well defined to allow proper assessment against the Development Plan.	Doc 1		
G7. Process used not relevant for Oundle. Not aligned with green space and the other NP objectives.	Local needs and aspirations are not taken into account. Conflicts and inconsistencies manifest in the NP.	The issues considered in doc 1 are appropriate for Oundle. They refer to local evidence on open space and refer to the views of residents (though currently without any quantification that would allow the weighting to be considered). This information now needs to be built into a more structured process already highlighted. Need to check for alignment with other NP objectives particularly those that rely on the use of open space (community, recreation and sporting facilities, connectivity and parking, employment and business, housing, tourism).	Doc 1		See risk H7 and recommended action. (See Final Report Recommended Action 4)
G8. Process not applied consistently.	Allocation/designation is arbitrary and open to challenge.	There is no process in place.	Doc 1		See risk G2 and recommended action.
G9. Not all potential green space sites are considered including those within housing development sites.	Challenges made on the basis of exclusion.	There is no requirement for all green spaces in the town to be considered - only those with demonstrable community importance. Other green spaces can be covered by more general policies. The process should only address those green spaces of demonstrable community importance.	Doc 1		See risk G2 and recommended action.
G10. Developers/land owners not engaged in the outcome of the allocation/designation process.	No win win optimisation. Potential for challenge and conflict.	See comments and recommendations on processes set out above. No evidence was found that developers/landowners have been satisfactorily included in discussions concerning green space.	Doc 1		See risk H11 and recommended action. (See Final Report Recommended Action 6)
G11. Residents not engaged in the outcome of the allocation/designation process.	Residents don't support outcome. Potential for challenge and conflict.	Residents have been consulted on local green space during consultation exercises. The process needs to explain how these views will be weighted and taken into account.	Doc 1		See risk G2 and recommended action.

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G12. Local planning authority and other consultation bodies not engaged in the process.	Potential for challenge and conflict.	There is a requirement for consultation to take place in relation to green space but it carries less importance than that for housing development sites.	Doc 1		See risk H13 and recommended action. (See Final Report Recommended Action 7)
G13. Conclusions of the allocation process are not clearly explained	Potential for challenge and conflict.	Conclusions not yet available.	Doc 1		See risk G2 and recommended action.