

Housing Group responses to Red factors in Audit.

H3:

There is no narrative to explain the rating for the quantitative assessment, in addition some elements have been left blank.

There was no quantitative assessment of sites using a numerical model to aggregate different factors into an overall rating. The only quantitative elements were:

- the numbers of units put forward by developers/owners in their response to the call for sites

- the numbers of units agreed following discussions with developers

This was informed by a decision by OTC to allocate the minimum number of units required by the ENDC Core Strategy given the experience that the town was not in favour of more development in any case, and attempts to put more in would risk the Neighbourhood Plan failing to secure support at referendum. This ensures that the NP approach to housing conforms with the ENDC Core Strategy for 2031 as required by Para 16 of NPPF. The actual numbers agreed for each site followed discussions with developers reflected in the letters sent to developers in December 2015 that set out where discussions had reached.

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.

Document 2 is a summary of proposals put forward in response to the call for sites. The sites put forward in response were evaluated for suitability for development in Oundle. Those that proved suitable with no serious constraints were used as the basis for allocating housing numbers and mix to meet the requirements of the ENDC Core Strategy.

The process used was as follows:

1. A call for proposals on specific sites.

This was notified on the OTC website. The aim was to get a full picture of the ambitions of developers and owners of sites for the 2021-2031 period following the RNOT plan. The information sought included an overview of house numbers (and mix?) proposed. Information was received from xx developers about yy sites: these suggested a total of 1200 new houses.

2. Determining the number of new houses needed in 2021-2031

The minimum was determined by the ENDC Core Strategy for the period: this came to 250-260. There was also guidance on the mix required and that 40% should be affordable.

OTC directed that the Neighbourhood Plan should focus on identifying sites for building the minimum number of new homes required, given their knowledge of the community's resistance to new housing. Seeking more risked the NP failing to secure support in a referendum. (Need a clear reference here: minutes, letter, email.)

3. Site evaluation.

Maroon Planning recommended a set of criteria.

Information was found to allow a judgement on the suitability of the site for development on each criterion.

Existing information was used where relevant, such as SHLAA report ratings, but not

available for all sites.

Identified 8 sites which were suitable for development with no major constraints: all were broadly similar in suitability.

(How many rejected? Need to mention other sites, not put forward but identified in earlier work and rejected)

4. Housing allocation.

The owners/developers for all sites were contacted, and engaged in discussion over actual numbers for sites identified as suitable.

The NP Questionnaire sought inputs from the community concerning their preferred approach to new housing. The firm preference was for several relatively small developments across the town rather than one or two larger developments. This provided the basis for discussions with developers on each suitable site.

Other factors included contributions to public benefits supported by the community in the NP Questionnaire, including informal recreation green space, footpaths and cycle routes, more land for a cemetery etc.

This resulted in 287 new houses on 8 sites agreed with 10 developers.

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.

The Strategic Housing Land Availability Assessment (SHLAA) report was used to provide existing information. It did not cover all sites put forward, and not all sites it included were proposed. Where the information was relevant it was used to inform judgements about specific factors recommended by Maroon Planning. It was also used to review additional sites not presented to confirm they were reasonable to exclude, largely because owners did not wish to develop.

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.

I need to see these documents to sort this bit out. My memory is that this summary is misleading.

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.

Our approach was to reject all sites put forward with Red or Amber level constraints, and accept all sites with Green overall ratings. These could accommodate sufficient houses to meet the requirement from the Core Strategy to accommodate 250-260 new houses. We opened discussions with the developers and owners who presented these sites. We have sent letters setting out what we believe has been agreed for each site and expect this to be confirmed by the developers. Maintaining these relationships through the process when

planning applications are made is important – so they can be submitted for approval with OTC support, and hence should be approved quickly.

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.

I need to see this document.

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

Timeline:

Date	What happened	Description and reasons
	Call for sites	Achieved by placing request on OTC website. Aimed to identify relevant proposals for new housing from developers and owners. Asked for outline proposals including numbers of houses and types. Result: secured information on X sites with proposals for 1200 new houses