

Oundle Town Council's argument, that better alternatives have not been considered, is presented as this critique of ENC's paper "SA for the East Northamptonshire Local Plan (Part 2) January 2021"

Looking at the section for Oundle

ENC/ACOM content in Black

Oundle Town Council Notes in Red

Oundle

5.2.11 To ensure that these needs are met in an appropriate way, the Local Plan seeks to allocate land for housing development. Given that there is a range of site options, it is possible that the housing target could be achieved in a number of ways.

5.2.12 The Council explored a range of alternatives for Oundle, and an Interim SA Report was prepared in December 2018 presenting a discussion of the alternatives and the appraisal findings. The content of the Interim SA Report is replicated below.

The SA Report of December 2018 compares the wrong sites. It does not evaluate the alternative site proposal put to the Neighbourhood Plan Examiner; the authors have studied the wrong plan.

Strategic alternatives for Oundle

5.2.13 The draft Local Plan identifies three sites that are considered suitable for housing development in Oundle to meet identified needs. These sites have been identified through a review of available sites and an assessment of their sustainability. The allocation of these three sites is therefore a poor approach to housing development in Oundle. The logic for discounting the alternative site is not sound, and despite the errors in assessment being pointed out to ENC, they are still presented in this paper as facts.

5.2.14 For Option 1 (The proposed approach) a total of 300 homes are proposed at three sites:

- Stoke Doyle Road – around 70 dwellings;
- Cotterstock Road – around 130 dwellings;
- St Christopher's Drive – around 100 dwellings.

There is evidence, shown in the ENC March 2018 5 year housing plan, that these sites were selected prior to the first SA, and that evidence was manipulated to favour these sites

5.2.15 The Council considered alternative site options to help aid the decision-making process. However no other 'strategies' for development were identified as reasonable.

As above. We will show how the ENC evaluation of the alternative sites is not robust

5.2.16 Oundle Town Council submitted the Oundle Neighbourhood Plan for examination in May 2019. This proposed an alternative suite of housing land allocations and (for the purposes of this sustainability appraisal) is denoted as "Option 2"; a total of 312 homes are proposed at seven sites:

- Site 19 - Policy 0.19 - Land East of St Christopher's Drive (45 dwellings)
- Site 20 - Policy 0.20 - Land South of Herne Road (45 dwellings)
- Site 21 - Policy 0.21 - Millers Field, Benefield Road (12 dwellings)
- Site 22 - Policy 0.22 - Land Adjacent to Cemetery, Stoke Doyle Road (50 dwellings)
- Site 23 - Policy 0.23 - Land South of Wakerley Close (10 dwellings)
- Site 24 - Policy 0.24 - Land North of Benefield Road (120 dwellings)
- Site 25 - Policy 0.25 - Land East of Cotterstock Road (30 dwellings)

These are not the sites submitted to the for examination. The alternative plan, known to ENC, is not evaluated in this or any other document. These alternative sites failed at examination on the technicality, that although they had through a Reg16 consultation, and been enthusiastically approved by the town, that the Reg14 consultation should be repeated. And, that evaluation should be carried out using ENCs criteria, which, as we show below, results in them being the best sites.

- 5.2.17 No further strategic alternatives have been identified as reasonable. As the previous argument, ENC have had the alternatives presented to them on numerous occasions, and, we believe due to their pre selection of sites, have failed to study them professionally.

Summary of effects

- 5.2.18 Table 5.5 below sets out a visual summary of the appraisal findings for the two reasonable alternatives. A detailed appraisal is included at Appendix II

Table 5.5: Summary of strategic options for Oundle

SA Topic / Objective	Option 1	Option 2
Accessibility	✘	✘✘
Housing	+++	+ / ?
Health and liveability	+	++
Crime	0	0
Community Value	0	+
Biodiversity	?	?
Landscape	✘	✘✘
Cultural Heritage	0	0
Climate change	0	0
Air quality	✘	✘
Water and natural hazard	✘	✘
Soil and land	✘	✘✘
Minerals	0	0
Energy use and waste	0	0
Employment, skills and wealth creation	+	+?
Town centres	+	+

Since this analysis does not consider the alternatives site known to ENC, it is of little purpose.

As a point of note. What is shown here as Alternative 2 is a proposal developed as part of the neighbourhood planning process, as a collaboration between OTC and ENC. Following consultation with the town, over ways of increasing the housing capacity, the town voted strongly in favour of splitting the sites into small units, primarily to spread the traffic. ENC supported this plan for 5 years, until they had pressure from two developers. They then, in 2018, argued that it was not robust in its use of partially developed sites. At the same time, unknown to OTC, they allocated the two developer's sites in their 5 year housing supply quota.

- 5.2.19 The two strategic options perform relatively the same across the range of sustainability topics. This is not unsurprising given that they are in the same settlement, propose similar levels of growth (though option 2 could require additional development), and involve some of the same sites (albeit different boundaries).
- 5.2.20 For both options, neutral effects are predicted for a range of factors, including; minerals, energy use and waste, crime, climate change and cultural heritage. **Which is interesting because later ENC dismiss the Benefield Road site due to an erroneous cultural heritage problem.**
- 5.2.21 Minor negative effects arise for both options with regards to air quality, water and natural hazards. These issues are more relevant at a settlement scale and pose no particular issue for either approach. **Road noise and surface water are ignored on the St Christophers Drive site. Odours from the sewage farm are ignored at the Cotterstock Road site.**

- 5.2.22 For other factors, some differences in the two options can be noticed. In particular, Option 2 is likely to generate more prominent negative effects with regards to the efficient use of land, effects on landscape character and accessibility. However, none of these effects are likely to be significant if mitigation measures are secured as proposed. **This is the 'partially developed site' argument that ENC presented after 5 years of developing the strategy with OTC. The argument is weak, since a partially developed site can always be fully developed later if the need is there. The accessibility consideration ignores the poor access to one site, and totally overlooks the traffic easing benefit to the town of spreading the allocation over multiple sites.**
- 5.2.23 From a positive perspective, each option would have similar benefits with regards to the creation of jobs in construction, an injection of spending into the local economy and town centres, and through wealth creation. However, differences are noted between the approaches for three SA topics. For housing, the Local Plan approach (Option 1) provides a more deliverable approach, and the scale of developments would be better placed to support infrastructure improvements and affordable housing. Therefore, it would have significant positive effects. **There were no infrastructure improvements proposed in any of the options. There are no changes to the ability to support affordable housing.**
- 5.2.24 This contrasts with Option 2, which proposes several sites with deliverability issues that could prevent significant positive effects from being generated. This is quite a critical issue. **The "Critical Issue" of early delivery was never put to the alternative site owners, therefore they cannot be judged against it. The plan put to the other developers was for completion before 2031, some 14 years from the date of outline submission. ENC had put their preselected sites in the 5 year housing supply, for completion 2023 to 2025, but had not told any other developer of this need.**
- 5.2.25 Where Option 2 does perform more favourably though is in the likely generation of greater positive effects (than option 1) with regards to community development (given that the approach has been developed by the 'community', and in terms of health and liveability **Community benefits were undervalued. At examination of the Oundle Neighbourhood plan it was argued by ENC that because sites had a community value, then OTC could be seen as having a biased view, due to their vested interest in the option.**

Individual site assessments

- 5.2.26 The Council undertook individual site assessments to understand the suitability of site options in Oundle, and how they perform in general sustainability terms. These assessments helped to understand sites on an individual basis, which also contributed to the identification of reasonable 'packages of sites' (as described above).
- 5.2.27 The site assessment methods and findings are set out in two separate evidence documents.

-Oundle Background Paper, November 2018: http://www.east-northamptonshire.gov.uk/downloads/file/11974/background_paper_-_assessment_of_alternative_site_options

This plan dismisses the Herne Road site because there is a school on it. This is clearly not true; the school is the other side of the road. An error by ENC's agent drew an incorrect border. Even after pointing out this error, ENC failed to correct the document. Preferring instead to identify the correct parcel of land as an 'alternative' in their later document.

The Benefield Road site is dismissed because of historic monuments which again were not part of the site, and not raised as an issue in the later documents. Equally, issues of access, road noise, drainage and sewage infrastructure are overlooked on ENC's pre-selected Cotterstock Road and St Christophers Drive sites.

- DLP Site Assessment Paper (July, 2019): [http://www.east-](http://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potent)

[northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potent](http://www.east-northamptonshire.gov.uk/downloads/file/11408/sustainability_assessment_of_potent)

This second attempt of site evaluation invents new reasons for rejecting the Herne Road and Benefield Road sites, although it does now accept that the Benefield Road sit is the third best option. It says that the Herne Road site developer is no longer interested in developing the site, which is untrue. And, that the Benfield Road site is "Unconnected to the Town", yet it connects two existing housing developments on its North and South borders, and the school playing field for the full length of its Easterly side.

The green space benefits to the town of these two sites is ignored. Herne Road included two cricket pitches, alongside the noisy A605 trunk road, a piece of land not suitable for residential development; Benefield Road included a much needed 'festival field'.

Further, site assessments of Cotterstock Road and St Christophers Drive fail to give adequate consideration to vehicle access, surface water, air quality or noise.

- 5.2.28 SA is supposed to be proportionate and avoid duplication. If the assessment criteria and methods take account of the SA Framework and employ suitable, consistent methods, then it is perfectly appropriate to rely upon these site assessments (rather than undertake separate / further assessments specifically for the SA).
- 5.2.29 The site assessment framework utilised by the Council (in the Oundle Background Paper) is the same as that established for the JCS and has been used widely to support the appraisal of sites across north Northamptonshire. A range of criteria are used that overlap considerably with the SA Framework, and therefore this approach is considered to be suitable.
- 5.2.30 Full details of the approach and the findings can be found in the background paper. The findings are summarised below at table 5.6.
- 5.2.31 The DLP Reassessment Paper (July 2019), provides an independent view on the site assessment process, building on the Council's earlier appraisals. **Errors as previously listed.**
- 5.2.32 The updated assessment matrix identifies 30 assessment criteria, which cover the full range of sustainability criteria. The report also states explicitly, that the methodology was developed taking account of and linking to the SA Framework used in the NNJCS and the ENLP SA processes.
- 5.2.33 The findings of this site assessment for shortlisted sites is also summarised below with brief commentary. Full details can be found in the separate report linked above.

Table 5.6: Site appraisal matrices for Oundle

reference		Proximity to services	Proximity to trunk/principal road junction	Connectivity to existing urban area	Access infrastructure	Capacity of highway network	Ease of utility provision	Impact of an existing notifiable installation, including pipelines, on the development	Impact on existing sports and recreation facilities	Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development.	Impact of the development on neighbouring land uses	Impact on biodiversity	Impact on the stock of minerals	Impact on the quality of agricultural land	Impact on the use of previously developed land	Impact on food risk	Impact on the existing form of the settlement	Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens	Impact on heritage	Impact on visual landscape	Impact on the environment or a protected species or on a site recognised for its wildlife or geological importance	Impact on biodiversity	capacity	
LPP2S A7	LAND AND BUILDINGS AT 153 GLAPTHORN ROAD OUNDLE																							N/A
LPP2S A44	Rays Field ^{2*}																							Unknown
LPP2S A64	Land off Glapthorn Road, Oundle*																							Unknown
LPP2S A117	Parcel fronting Cotterstock Road (land within Oundle Primary School grounds)*																							Unknown
LPP2S A218	Land at St Peters Road																							49
LPP2 SA219	Land at Milton Road (Oundle Town Cricket Club)																							59
LPP2 SA220	Land north of Benefield Road																							355
LPP2 SA221	Land either side of Herne Rd inc School																							352
LPP2 SA222	Land east of St Christopher's Drive																							95
LPP2 SA223	Land West of Cotterstock Road																							124
LPP2 SA224	Land off Stoke Doyle Road																							200
LPP2 SA225	Land off Cotterstock Road and St Peters Road North																							87
LPP2 SA241	Land South of Benefield Rd/Wakerley Close																							167
LPP2 SA242	Land Between 22 and 24 Benefield Road																							15
LPP2 SA250	Dairy Farm, Stoke Hill																							20

Table 5.7: Summary of DLP site scores for Oundle

Site	Overall Score	Rank
'Ray's Field'	-14	10
Land West of Glapthorn Rd	-23	12
Land off Oundle Primary School, Cotterstock Rd	-15	11
Land off Benefield Rd	20	2
Land either side of Herne Rd	-12	9
Land South of Herne Rd	8	5
Land off St Christopher's Drive	22	1
Land West of Cotterstock Rd	-5	8
Land off Stoke Doyle Rd	12	4
Land East of Cotterstock Road / North of St Peter's Road	17	3
Land South of Benefield Road / Wakerley Close	6	7
Dairy Farm, Stoke Hill	7	6

Table 5.7: Summary of DLP site scores for Oundle, with corrections

Site	Overall Score		Rank	
	ENC	Correct	ENC	Correct
Rays field'	-14		10	10
Land West of Glapthorn Rd	-23		12	12
Land off Oundle Primary School, Cotterstock Rd	-15		11	11
Land off Benefield Rd	20	28	2	2
Land Either Side of Herne Rd	-12		9	9
Land South of Herne Rd	8	24	5	3
Land off St Christophers Drive	22	10	1	4
Land West of Cotterstock Rd	-5		8	8
Land off Stoke Doyle Rd	12	30	4	1
Land East of Cotterstock Road / North of St Peter's Road	17	10	3	4
Land South of Benefield Road / Wakerley Close	6		7	7
Dairy Farm. Stoke Hill	7		6	6

One of the main changes in scoring comes from correcting scoring of availability of the Herne Road and Stoke Doyle sites. The weighted score sheet, which score site availability and achievability as two separate items, has these two site going from -3 to 5 for each category, resulting in change of 16 simply because, for example, a developer responds to one email.

What is most significant is the scale of the difference between the top 3 sites and the next two; 31-28-24 compared to 10

5.2.34 The three sites proposed for allocation all perform relatively well in comparison to the alternatives against the full range of assessment criteria (ranking 1st, 3rd and 4th). **As demonstrated, the three sites identified by ENC are not the strongest sites.**

5.2.35 One site performs well that has not been proposed for allocation. This is Land off Benefield

Road. The DLP assessment (July 2019) found that the site scored favourably in terms of overall sustainability. This is largely due to the relative lack of development constraints affecting this site; e.g. the site is in a single ownership with no significant potential barriers to development.

- 5.2.36 However, the site is not considered to be achievable, when compared to the three sites put forward by the District Council (Option 1). All of these have been subject to active engagements with a nominated housebuilder/ developer and are all at an advanced stage within the development management process. Furthermore, while the Benefield Road site is relatively unconstrained, there are concerns that this does not relate well to the wider built form at the western edge of the urban area.

In this single item, ENC state that the developers which they have shared the 2025 completion date with are performing better, because they are working to this timescale. At no point have ENC contacted the alternative developers to discuss the need for a 2025 completion.

The dismissal of the Benefield Road site, “does not relate well to the wider build form at the western edge of the urban area” is unfounded. The site connects two established housing developments and provides a useful pedestrian link for Benefield Road residents to the Junior School.

- 5.2.37 For these reasons, the Benefield Road site has not been proposed for allocation, despite its favourable scoring in the DLP assessment.