

## **Response to Objectives Review Panel Report: Housing**

Phillip Stearn was asked to convene a group to address the issues raised by the Objectives Review Panel. Neil Fraser, Richard Tremellen and Mark Felton joined the group.

We met on 30 November, 7,14, 21 December 2015, 4, 11, 18 and 25 January 2016. Notes of all these meetings are available.

This report starts with addressing the key risks identified in Recommendations 1-8 in the Objectives Review Panel final report. These are H3, H7, H10, H11, H13 and H14. The report then covers additional factors likely to affect Oundle and housing need in Oundle and assesses their potential impact. We conclude with some observations on the implications for the housing policies included in the Neighbourhood Plan.

### **Risk H3. Process not transparent or documented.**

The following are the comments made in the Objectives Review Panel Report:

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.

The following are the Improvement Opportunities suggested:

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)

Overall objectives for the Housing Group:

Sources: Document 2 p2, Document 5 p16,

1. To propose the preferred site or sites for future residential development in the town in light of the requirements of the Core Strategy Review.
2. To encourage new development to be located within 1 mile of the town centre in order to support Connectivity and maintain the compact nature of the town.

Document 5 includes additional objectives covering design quality, transport and infrastructure.

The overall process consists of the following steps:

1. Call for sites.  
This was done through the OTC/NP website. This asked for details of development proposals including housing numbers and types and contributions to wider community benefits. Other sites covered in earlier work preparing for RNOT Plan were also considered, mainly to review likelihood of proposals being brought forward in future.
2. Gathering information on proposed sites.  
This was focused on two issues:
  - suitability for development
  - potential contribution to wider Neighbourhood Plan objectivesOther sites that had been considered in the recent past were reviewed to check whether proposals were likely to come forward, and if so, whether they were suitable for development.
3. Site evaluation.  
The aim was to identify sites that were broadly suitable for development in a sustainable way and where the owner/developer was likely to bring proposals forward for development in 2021-2031. Sites with significant constraints were rejected for development, including sites and parts of sites outside Oundle Parish. Those proposing these sites were informed of their unsuitability for development.  
Eight sites were identified that were broadly equally suitable for development.
4. Agree target housing numbers and mix.  
Once the Core Strategy Review was sufficiently advanced a minimum required number of houses for development in 2021-2031 in Oundle Parish was established: about 260. Oundle Town Council directed that this should be the basis for housing numbers in the Neighbourhood Plan based on their experience and knowledge of the views of the community.
5. Allocation target numbers of houses to sites.  
The response to the Neighbourhood Plan questionnaire indicated strong support for development to occur across the town as several small to medium developments rather than for one or two larger developments. There was also support for development to be within 1 mile/a 10-minute walk of the town centre to retain the compact character of Oundle.  
It was recognised that sites needed to be viable and make contributions to the wider objectives of the Neighbourhood Plan. An initial proposed number was allocated to the eight sites, taking account of the proposed types of houses and the proposed contributions to wider community benefits. This provided the basis for discussions with developers/owners.

6. Discussions with developers.

Each site was then discussed with the owner/developer in face to face meetings. These meetings set out the overall context set by the Core Strategy Review, the wider objectives of the Neighbourhood Plan and how the particular site could contribute to the housing targets that Oundle has to contribute to, and the potential contributions to the other objectives of the Neighbourhood Plan. This included consideration of viability, and led to changes in both numbers of houses and changes in wider contributions.

Broad agreement was reached for 272 housing units spread across the 8 sites and a range of wider contributions. Letters have been sent confirming the position reached to each developer seeking agreement.

All this was done according to RTPI/LGA guidance on pre-application discussion and positions the developers of these sites as “development partners” of the Town Council. These relationships will need to be positively maintained through to formal application for planning permission of detailed proposals with wider commitments to additional public benefits that will be supported by OTC.

7. Overview and policies for Neighbourhood Plan.

The result is a site by site statement of housing number and mix, and an overview of additional public benefits provided, that will provide 274 houses with an appropriate mix that is broadly consistent with the requirements established through the Core Strategy Review. These are set out in Document 3. The following table summarises the position:

size	Number	percent
larger 3/4+	118	43%
small <=2	104	38%
med 2/3+3	53	19%
	274	

These are 21% affordable and 79% market homes.

The key issues are reflected in a set of proposed policies to guide decisions on housing applications in 2021-2031.

Key issues raised by Review Report on H3

Quantitative Assessment:

The methodology is set out in Document 7. The approach adopted is based on a number of criteria reflecting practical issues and the sustainability of development on each site. Each criterion is assessed on a 2-4 point RAG scale, site by site, using existing knowledge, inputs from relevant authorities and/or observations on the site. This is not really “quantitative” – it is a category assignment process that helps identify sites with significant constraints.

Document 4 sets out the results for each site and sets out the key sources of information used, specifically the Anglian Water assessment of each site. As set out in Document 7 the process aims to eliminate sites with significant constraints and then identify those with the fewest moderate constraints to take forward for a more detailed consideration.

Document 5 provides the wider background of our knowledge of sites considered in the recent past for development, including sites put forward in previous studies but not brought forward as part of the call for sites process for the Neighbourhood Plan. In terms related to the Review Report:

- Not all sites were considered in the SHLAA process, so not all have information from that study
- As this stage was primarily to eliminate sites with serious constraints from further consideration (subject to the remaining sites being able to support the required housing numbers) the focus was on being sure these serious constraints were identified.

Qualitative Assessment.

Document 7 sets out the process clearly: this is a process of engaging owners/developers as well as bringing additional knowledge of wider community benefits and preferences that are relevant to each site. The Neighbourhood Plan Questionnaire and the Oundle 2020 work provides information on community preferences and priorities. The Neighbourhood Plan working groups provide information on wider benefits and issues that each site may affect. The key issues were identified in the information provided in the Call for Sites, and addressed in the discussions with owners/developers, which also included discussions on housing numbers and types alongside additional wider community benefits, and the combined implications for the viability of the proposed development. The results are summarised in Document 2 and captured in letters to developers/owners.

The following table sets out the response to the key issues raised under H3:

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

This is set out in Document 7. They are essentially judgements of each criterion in terms of RAG suitability descriptors. The aim, as stated in Document 7, is to identify unsuitable sites and eliminate them from the next stage of qualitative assessment. If some elements are blank, it is because they are not obviously negative.

**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.**

It is made clear in Document 5 that not all sites were considered in the SHLAA process so would not have a rating. Again, the key focus in Document 5 is to consider sites previously considered for development and review their possible capacity for development for the current exercise. This was particularly important for sites that were previously considered suitable for development but were not proposed through the call for sites. The site by site review in Document 5 confirms that there are no obvious sites likely to be developable between 2021 and 2031, and suitable for development that have not come forward through the call for sites.

**The qualitative assessment has not been completed. (Doc 4 part 2 pp1-9).**

This document does not capture the qualitative assessment – it is mainly focused on the quantitative assessment designed to identify unsuitable sites.

**Separately, a series of qualitative statements have been captured (doc 2) but it has not been made clear how these have been used.**

These summarise the results of the qualitative assessment and the basic paper sets out the overall objectives, the factors that should be taken into account, sets out the community concerns and preferences, and then captures the results of discussions with owners/developers and the overall judgement of the Housing Group. The purpose of the paper is to capture the overall results.

**There is no clarity on how the objectives and policies (doc 5 pp16-18) have been used in the final decision making process.**

**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.**

The main use is the objectives (Nos 1 and 2) combined with the factors in Document 2 p2-3 influence key choices such as total numbers and mix of houses required in 2021-31 and the preferences expressed by the community on how best to accommodate the required development.

The Neighbourhood Plan Working Groups and the results of the Oundle 2020 process provide additional information on issues that should affect choices about housing allocation and additional community benefits that could be linked to housing development.

The policies emerge from the process rather than shape it, and we agree this should be clearly set out.

**There is no apparent linkage between doc 5 pp23-48 and the information in doc 2.**

These pages give more detail on the information about each site, including a summary of the quantitative assessments made and recorded in Document 4. Document 2 provides a state of play agreed for each site following discussions with owners/developers that summarise the position following the information collection described in Document 5.

**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.**

These pages set out the key issues:

- The possible number of houses is much larger than the required number
- The community supported small developments throughout the town within 1 mile of the town centre
- The housing mix required a high proportion of smaller houses, so sites offering these would need to be prioritised
- Developers were offering a different range of wider community benefits
- As there is no certainty that all sites will be developed, some additional areas suitable for development need to be identified to substitute for developments that do not in fact come forward

The initial allocation took these into account and provided the basis for discussions with developers.

These led to a refinement of the outline proposals for each site, captured in Document 2 and in the letters to developers sent out in December 2015.

We agree the policies proposed in Document 5 need to be reviewed in light of the work done in response to the Review Report. This group is willing to do this should we be asked. Our current thoughts are:

- The current sites and the outline development proposals are adopted through the Neighbourhood Plan.
- The additional sites for later development or to provide alternatives to the preferred sites are recognised through the Neighbourhood Plan.
- The Council ensure the relationships with the owners/developers of the sites as “development partners” are maintained through to formal planning application and subsequent development to ensure the wider community benefits are realised.

**Risk H7. Process not relevant to Oundle.**

The following are the comments made in the Objectives Review Report:

**There are two parts to managing this risk:**

**1. Full completion of the sustainability/developability matrix for each site.**

This is complete in Document 4 other than the assessment for Habitat and Groundwater, which has not been done for any site. Habitat will be covered in the SEA. The criteria for Groundwater refer to locations on major high-permeable strata: Oundle is not on this type of geology.

**2. Incorporating qualitative factors to ensure that the right answer for Oundle is formulated as opposed to an answer that is right.**

See response to H3, and as outlined in Document 5. The wider community benefits considered relevant are derived from the work done through Oundle 2020 and the Neighbourhood Plan Working Groups. Examples include contributions to the circumference pathway, to cycle routes and to sports facilities. The specific contributions sought are directly derived from the Neighbourhood Plan or from the results of the Neighbourhood Plan Questionnaire including land for a cemetery and a festival site. These factors are specific to Oundle and not generic.

**The objectives form the principle framework within which to frame this qualitative review. 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. 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.**

See response to H3. There are two primary objectives that are shared across Document 2 and 5. Other "objectives" are included in some documents. These issues are set out as additional factors to address elsewhere. As outlined in the response to H3, the two objectives below are common across the documentation and provide the basis for the housing group work:

1. To propose the preferred site or sites for future residential development in the town in the light of the requirements of the Core Strategy Review

2 To provide for future residential development to take place within one mile of the town centre in order to support connectivity and maintain the compact nature of the town

The factors that have changed through the process are the total number of houses, their allocation across the suitable developable sites identified, the mix of housing types on these sites and the additional contributions to wider community benefits.

In conclusion the approach taken to allocating sufficient house numbers across the available sites has been shaped by the objectives of the Neighbourhood Plan Working Party, and hence are tailored to the specific needs and priorities of Oundle, and to the expressed preferences of the community.

**Risk H10: not engaged neighbouring Parishes.**

**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.**

Once the boundary for the Neighbourhood Plan was determined as the Parish, the focus was on the needs of the community resident within the Parish. Clearly as a rural service centre, the demands on Oundle resources due to the needs of the wider population need to be included in the development of the Plan. Equally developments outside the Parish may affect the level of use of Oundle, and this also needs to be

considered. The Oundle 2020 process did engage some surrounding Parishes through sharing material and public meetings. The results were used by the Neighbourhood Plan Groups. The NPWP were asked by the Council to focus on developing the plan and consulting the Oundle community, leaving consultation and engagement with surrounding Parishes until later. There is a regular meeting with surrounding Parishes, who have been kept informed of progress through this and will be engaged and consulted on later. External issues such as Barnwell Park, the Marina and proposed developments at Deenethorpe have been considered by the NPWP both for impacts on Oundle and contributions of wider benefits for the residents of and visitors to Oundle.

**Risk H11: inadequate engagement of owners/developers.**

**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.**

We agree. All those putting forward proposals in response to the Call for Sites have been individually contacted. Those whose sites were considered unsuitable were told of this as soon as it was known. All developers were individually met to discuss what proposals would be appropriate for their individual sites in light of the overall housing numbers and mix required as a result of the Core Strategy Review. These were adjusted in light of willingness to contribute an appropriate mix and contributions to wider community benefits and the viability of the development. Letters have been sent to all developers of suitable sites, including those with no housing allocated but considered suitable for housing in future, that set out the position reached and asking them to confirm this is their understanding. This provides the basis for the housing recommendations in the Neighbourhood Plan and the foundation for developing detailed proposals with these "development partners" for submission for planning approval in 2021-2031.

**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.**

We now feel all owners/developers of the suitable sites identified following the assessment of those submitted in response to the Call for Sites have been equitably engaged. Their response to the letters setting out the current position will confirm this, or identify areas where further discussion is required.

**Risk H13: incomplete engagement of statutory consultees.**

**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.**

The main consultees were contacted. This is at a strategic level, as each site will need to address the site specific issues as part of preparing a detailed proposal for planning permission. We engaged :

- the County Archaeologist to identify known monuments and remains
  - Natural England: their website showed no SSSIs or known key sites for protected species. The SEA work and the Habitats Regulations Assessments will confirm this. As proposals for each site are developed detailed surveys are required to identify locally significant wildlife on each site, including populations that are not nationally significant of protected species, so appropriate mitigation for any unavoidable impacts on these species is integrated into the proposal.
  - Environment Agency: largely concerned over flood risk using their maps. No sites are in an identified flood risk area. Each site will need to be assessed for storm flood risks, both on-site and off-site due to their surface water drainage as part of the detailed development proposals.
- Anglian Water provided their views on the capacity of the local drainage and sewer systems.

- we also identified whether a site had contamination issues.  
- the Transport Study 2 report considered the impact of each site, and of the collection of sites, on traffic flows and on the junction capacities in the town, and concluded that there were no problems from these developments

**Risk H14: no coverage of EU Regulations and Directives.**

**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.**  
This is in hand. Essentially none of the sites are Natura 2000 sites and whilst there may be European Protected Species on some of these sites, mitigation should be possible and none have been designated for these species. Part of the process of developing proposals for these sites will be to assess the actual presence of protected species early enough to incorporate mitigation proposals into the planning applications.

**Other factors affecting Oundle**

This section covers matters not directly addressed in the work on the Neighbourhood Plan, but which may nonetheless affect Oundle and the need for facilities and services within Oundle.

We think the following issues are relevant and may have an impact on Oundle in the period 2021-2031 covered by the Neighbourhood Plan:

1. Housing proposals not considered.  
There are several sites, including sites owned by NCC, where we are aware that proposals are in place or being developed. These are sites within Oundle and some sites in neighbouring Parishes.
2. Extra care homes.  
This is driven by the aging population. Northamptonshire County Council is developing a new policy. This is likely to provide the basis for the development of a major initiative in Oundle.
3. Denethorpe Village.  
A significant development of c1400 houses will have a considerable influence on Oundle, in particular as a source of additional users of facilities in Oundle and a contribution to the customer base of our business and retail services.
4. Oundle Marina and Barnwell Park.  
Potential employment for residents as well as providing recreation and leisure opportunities for residents. Part of the growth of tourism in and around the Nene Valley as well, offering opportunities for Oundle business to secure additional customers.
5. Fairline closure.  
This is a major change to local employment. It provides opportunities for new employment in and near the town, as well as opening up the possibility of making a link directly from their car park to the Ashton Road/East Road roundabout, making it of greater possible value to the town and ensuring the workforce park there rather than in the long stay car park.



6. Destination Nene Valley.

A range of leisure and wellbeing initiatives taken forward by ENC including the Greenway cycle/walking paths and the Blueway Plan. These are firming up and likely to lead to real investments in 2021-2031. Oundle will benefit by linking to these initiatives, contributing to cycle routes and footpaths, linking the town to a wider network, helping residents and attracting visitors.

7. Riverside Pub.

When the future is sorted there will be an effect on Oundle. It could become a key element in the tourism and leisure sector in Oundle. It is seen as an eyesore at present, detracting from the image of Oundle from the main road access route. Whilst it is in Polebrook Parish the main impact is on Oundle.

8. Education system.

As the change to a two tier system is complete the impact on transport will need addressing. The pattern of movement of buses and cars will be influenced as will the need for cycle routes and paths to encourage more pupils living in Oundle to walk or cycle to school, reducing peak traffic flows.

In addition the use of the Primary School site on Milton Road and the facilities it used including the nearby playing field will need consideration. The site is close to the town centre, so suitable for additional 2 hour parking and for possible additional employment use.