

The Oundle Examiner criticises “the process of considering reasonable alternatives.”

He argues that “appropriate and available evidence””has not been used in the site selection and appraisal process”.

This must set the context for your discussion. [National Planning Policy](#) notes that Local Plans are also only sound if their findings are -

“Justified – taking into account reasonable alternatives, and based on proportionate evidence; “

“Proportional Evidence”?

- [ENC’s Draft Plan](#) (with three development sites “[allocated](#)”) appeared in November 2018, with [a background paper](#) littered with basic errors.
- A month later the [AECOM paper](#) appeared, trying to evidence the decision already taken
- Next, clear [consultation](#) feedback - Cotterstock Road was the worst choice, with St Christopher’s Drive hard on its heels. JCS Policy 1 demands plans “take account of local evidence”, and residents knowledge doesn’t get any more local.
- Your own reports support these concerns – e.g.
 - AECOM notes St Christopher’s has “high and moderate risk of surface water flooding throughout the site”
 - Highways states the only access does not have “adequate highway width”
 - AW have concerns about sewage at both sites
- ONLY in March 2019 were [DLP site assessments](#) commissioned - tasked with providing “robust evidence” that should have come first, DLP admits it used the preferred sites “as its starting point” AND ENC, having started talks with Gladman, the “proposers” of the Cotterstock Road site, about “strategic site allocations” in Oundle in July 2018, dictated the “broad methodology”.

Shaping and creating evidence AFTER decisions are made challenges the very idea that a Local Plan should be “**based on proportionate evidence**”.

“Reasonable alternatives”?

The DLP Site assessments threw up a number, and after errors are adjusted, it is clear that Benefield and Hearne Roads are able to provide MORE than enough housing for the plan period WITH added community benefits.

It's shocking that the Draft Plan wasn't then adjusted.

Finally, National Planning expects Plan-making to “**be shaped by early.....and effective engagement between plan makers and communities**” and “**infrastructure operators**”.

- The Appendix 2 Addendum in front of you is proof this did not happen – Anglian Water's feedback arrived only 3 days before it was presented to you last July – but 7 months after Plan was decided - issues raised about sewage are untouched in the Plan!

The Oundle Examiner notes that “site selection and appraisal is flawed and ... choices unsubstantiated by robust or appropriate evidence (indeed in a number of places are contradicted by available evidence).”, ~~suggesting this is “probably unlawful.”~~

It feels as if the same view should be levelled at these documents - evidence seems to have been gathered to prove what was already decided”unsound” seems a polite description..