

Our reference: JC/C/N382
Your reference: --
Local Planning Authority reference: --
Planning Inspectorate reference: --
Thursday 29th January 2015

5 Goldington Road,
Bedford
MK40 3JY

This matter is being dealt with by our **London office**:
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Mrs J Hodgson
Clerk to Stanwick Parish Council
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Northamptonshire **NN9 6QA**

Also by email to clerk.stanwickpc@outlook.com

Dear Sirs

Evidence base review: emerging Stanwick Neighbourhood Plan

Thank you for your valued instructions to Community Resource Planning to review and advise on the evidence base for your emerging Neighbourhood Plan. Our document review is now complete and we are in a position to offer clear advice on the robustness of the evidence base that you may seek to rely upon, and where there are deficiencies which local evidence-gathering will need to address.

Documents reviewed

We have thoroughly reviewed the following documents with specific reference to their evidence-base or policy implications on Stanwick:

- (i) Stanwick Parish Plan 2013-2018 (Stanwick Parish Council, 2013)
- (ii) ACRE Rural Community Profile
- (iii) North Northamptonshire Strategic Housing Land Availability Assessment (North Northamptonshire Joint Planning Unit, May 2013)
- (iv) North Northamptonshire Strategic Housing Market Assessment Update (Housing Vision, August 2012)
- (v) Stanwick Housing Needs and Mix Requirements Assessment (East Northamptonshire Council, June 2014)
- (vi) East Northamptonshire Level 1 Strategic Flood Risk Assessment Review and Update (URS Scott Wilson, August 2011)
- (vii) Northamptonshire Transportation Plan: Local Transport Plan (Northamptonshire County Council, March 2012)
- (viii) East Northamptonshire Landscape Sensitivity Reports (solar PV developments and wind turbine developments)(LUC, March 2014)
- (vix) Current Landscape Character Assessment (Countryside Agency, 2003)
- (x) East Northamptonshire Open Space, Sport and Recreation Study (PMP, 2005)
- (xi) North Northamptonshire Joint Core Strategy 2011-2031 (Pre-submission draft)(North Northamptonshire Joint Planning Unit, January 2015)
- (xii) Chancellor of the Exchequer's 2014 Autumn Statement

Planning officers at East Northamptonshire Council have been particularly cooperative in assisting in the provision of documents for our review; sadly, staff at the Joint Planning Unit have failed to respond to our request for information made on 9th January and our follow-up reminders on 14th and 23rd January. Consequently, we have been unable to review the nature or extent of any potential existing evidence base in respect of education capacity, provision and forecasts; or healthcare capacity, provision and forecasts. It is unfortunate that the JPU has proved uncooperative, particularly as the emerging Core Strategy seeks to place a level of reliance on community-led Neighbourhood Plans to deliver a quantum of housing growth in villages.

Evidence base: main issues identification

The work undertaken and clearly summarised in the **Stanwick Parish Plan** is both comprehensive and recent. It provides a clear indication of the main issues which residents and other stakeholders consider to be relevant to the Parish and accordingly it provides an appropriate basis for the next stage in the Neighbourhood Plan's development.

Evidence base: housing

There are several potential policies which the Neighbourhood Plan may wish to include in respect of housing development and our review has revealed a substantial evidence base that is appropriate to inform any such policies. The **North Northamptonshire Strategic Housing Land Availability Assessment** reviews all sites previously put forward for development and categorises their appropriateness for development. Sites are placed in three categories, with (1) being most preferable through to (3) being least preferable. Paragraph 8.11 helpfully concludes that there is no need for any category 3 sites to be allocated for development in East Northamptonshire, albeit some category 2A/2B sites will need to come forward.

Four sites in Stanwick Parish were put forward and assessed:

- #1091 (land East of Higham Road) was assessed as falling within Category 3
- #2094 (land off Dolben Avenue) was assessed as falling within Category 3
- #2099 (land at Stanwick) was assessed as falling within Category 3
- #2120 (Stanwick Glebe) was assessed as falling within Category 3

This document is both recent and robust and accordingly, you can conclude that it is not necessary for any of the sites previously promoted for residential development at Stanwick to be allocated for development to meet the District's 2011-2031 housing requirements.

This is not to say, of course, that the Neighbourhood Plan cannot or should not in itself identify sites for housing development and allocate them accordingly. Should the Neighbourhood Plan wish to pursue any site-specific housing development allocations, then the information in the **North Northamptonshire Strategic Housing Market Assessment Update** provides clear evidence on housing tenure mix requirements and forecasts across the entire East Northamptonshire District. Its conclusions in respect of housing tenure mix (broadly speaking, a need for 40% affordable housing and 60% market housing) are clear and reliable; should the Neighbourhood Plan wish to materially depart from that identified tenure mix split, additional local evidence-gathering would be necessary to substantiate this.

The more focused **Stanwick Housing Needs and Mix Requirements Assessment** notes that housing supply in Stanwick is made up of predominantly larger housing and that there is a demonstrable imbalance between household and property size. It robustly concludes that there is an identified need for additional smaller homes in the Stanwick Ward, particularly smaller houses and bungalows suitable for downsizers or emerging smaller households. The Assessment further evidences a lack of both affordable and privately-rented properties, with options for older people being particularly limited. This is an important locally-specific evidence base document which is recent and can be relied upon. Any housing-related Neighbourhood Plan policies would need to have regard to and reflect the Assessment's clear findings, with additional local evidence-gathering being necessary should the Neighbourhood Plan wish to depart from or question this evidence document in any substantive manner. A policy which, for example, specifically allocated a site solely for retirement bungalow development could be supported by the evidence in this document.

Evidence base: transport

The County Council is the local highway authority, albeit the Highways Agency manages and maintains the A45. The Chancellor of the Exchequer's 2014 Autumn Statement announced the dualling of the A45 from Stanwick to the A14, which has support in the **Northamptonshire Transport Plan**. The Neighbourhood Plan would not be able to propose any policy which would fetter, curtail or reverse this strategic decision. Trunk road network aside, the Transport Plan does not provide any evidence of, or prioritise, rural car parking in villages as a priority in policy or funding terms. Car parking stress points may be a valid local issue that can be addressed through policies in the Neighbourhood Plan, but to do so would require additional evidence-gathering through an appropriately framed and robust parking survey. You may wish to consider instructing a professional highway consultant to complete this work on your behalf.

Evidence base: flood risk

There is a "non-main river" running through the village, with the **Level 1 Strategic Flood Risk Assessment Review & Update** noting that there has been recorded historical flooding at Stanwick. Nonetheless, the majority of the village and its environs fall outside the flood plain and this position is unlikely to change when making allowances for climate change. The evidence base on flood risk (August 2011) is now starting to age but unless there have been any notable further flooding events in the past 4 years (for which additional evidence and analysis would be required), the Strategic Flood Risk Assessment can still be relied upon for Neighbourhood Planning purposes. The Strategic Flood Risk Assessment is purely that – strategic – and therefore should there be more specific concerns that localised flooding is a matter of concern to be addressed, a more detailed Flood Risk Assessment of the area(s) of known concern is recommended as an additional evidence base document.

Evidence base: landscape character

Stanwick's character in the wider landscape is summarised in the **Current Landscape Character Assessment** as being a "compact settlement centred around a junction". The Parish falls within the *Higham Ferrers to Thrapston* character area which is not a landscape protected by any national designation or recognised in any particular way for its natural beauty or other importance. This is not to say, of course, that the landscape setting of the village is not an important consideration. The **Landscape Sensitivity Reports** conclude that the limestone valley slopes around the village have little capacity for windfarm development, and that even smaller schemes of less than 5 turbines would have a high level of landscape impact. In terms of photovoltaic installations, the landscape is found to be less sensitive and

some such development (of up to 5 hectares) could be accommodated in the Parish without causing more than a “moderate” impact.

The existing landscape character appraisal documents are recent, comprehensive and can be relied upon. However, should the Neighbourhood Plan seek to allocate land on the edge of the village or in the wider countryside for any form of development, the existing evidence base would not be sufficient to assess the landscape impact of that development. Additional landscape assessment would be likely to be required on a site-by-site basis in the event that the Neighbourhood Plan wishes to consider any such allocation incorporating permanent built form.

Evidence base: open space & countryside access

The **Open Space, Sport and Recreation Study** is one of the oldest evidence-base documents which we have reviewed for Stanwick, and is patently in need of review and updating. It was prepared several years ago prior to the opening of Stanwick Lakes, and similarly takes no account of the open space provided nearby on the edge of Raunds. Whilst the document notes that the Cleborne amenity space needs to be improved, and Hill House Garden should be protected, it may be the case that neither of these recommendations now apply. Accordingly, a refreshed Open Space Assessment will be required to ensure that the evidence base on this topic is up-to-date and fit-for-purpose.

Separately, we have been unable to find any evidence in respect of an assessment of countryside access in the Parish. A Public Access Survey can often prove to be a useful document, evidencing not only the location, alignment and origin/destination of existing footpaths/bridleways and other rights of way in the Parish, but also identifying key locations for improvement or enhancement. This would appear to be particularly relevant in respect of any A45 crossing to Stanwick Lakes, particularly in light of the 2014 dualling announcement. A Countryside Access Appraisal could usefully provide evidence to support any preferred option identification and/or pedestrian crossing point location and specification policy in the Neighbourhood Plan, as well as identifying where additional rights of way links are required or locations for enhancement.

Evidence base: education & healthcare

We are unable to advise on the evidence base on these matters at the current time, given the disappointing lack of response from the Joint Planning Unit.

Evidence base: heritage

A Heritage Assessment would be a useful addition to the locally-generated evidence base and need not be an onerous or complicated document. It should identify all designated heritage assets in the Parish (be they listed buildings, scheduled ancient monuments, historic parks/gardens, Conservation Areas etc) as well as noting any key views to be protected (such as of the church, for example). Additionally, any much-loved unlisted buildings could be noted as being locally important undesigned heritage assets, provided that the Assessment clearly identifies and explains why they are locally important in architectural and/or historical terms.

Evidence base: community assets

A Neighbourhood Plan may seek to protect an existing local community facility or amenity from closure or redevelopment. Whilst it would separately be open to the Parish Council to propose the designation of an existing facility as an *Asset of Community Value*, nonetheless

the identification of such facilities in a separate evidence base document would be necessary should the Neighbourhood Plan seek to include protection policies. Assets identified, surveyed and assessed should also be accessible and used by the community but could be in private ownership, such as a public house or retail outlet. Additionally, a community assets survey could also identify the type of facility that would be desirable but which is currently absent. Specific additional evidence gathering would be required to explore and justify *why* any such additional facility is necessary, usually with reference to specific community surveys and an analysis of whether the community currently has to travel for such provision (a dental surgery, for example).

Summary

There is already a wide-ranging existing evidence base upon which the Neighbourhood Plan can rely. However, there remain some gaps which could usefully be filled with additional local evidence-gathering, on occasion to update aging elements of the existing evidence base. We **recommend** that additional evidence-gathering and report compilation is considered in respect of:

- (a) car parking pressure points and potential solutions
- (b) any areas of localised flooding concern
- (c) open space, sport & recreation
- (d) countryside access, including access to Stanwick Lakes
- (e) heritage
- (f) community assets

We have appended to this letter extracts from all of the documents which we have reviewed, enabling you to read and review for yourselves only the sections which we have found to be most relevant. It is acceptable to submit extract documents in this form in due course when the Neighbourhood Plan is more advanced through its process.

We trust that this evidence base review is of assistance to you and provides you with confidence to continue to move ahead in the preparation of your Neighbourhood Plan. We remain at your disposal to continue to advise as is necessary but in the mean time if you have any questions about this letter or our findings, do please contact us at your convenience.

Kind regards

Yours sincerely

James Croucher MTP MRTPI
Director

For and on behalf of Community Resource Planning Ltd

Enclosures: extract documents as listed