

Report of The Head of Planning and Local Development

WELLINGBOROUGH LOCAL PLAN

1 Purpose of report

This report seeks to inform the Council of the resources required to deliver the statutory duties in relation to preparation of an up-to-date Local Plan for the borough. It seeks to ensure that resources remain available for the entire review process.

This will help to support the Council's priorities of 'Promoting high quality growth' 'Delivering efficient and responsive services' and 'Enhancing the environment'.

2 Executive summary

The report sets out the need for an up-to-date Local Plan and seeks additional resources to deliver this. Whilst there are some resources to begin the review process, there is a need to ensure that sufficient additional funds remain available and allocated for this purpose to complete the adoption of the Local Plan.

3 Appendices

Appendix 1 – Local Plan Preparation process.

4 Proposed action:

4.1 The committee is invited to RESOLVE to approve the use of £214,000 of current reserves in 2014/15 and to include the additional resources of £330,000 needed in 2015/6 and 2016/7 in the Medium Term Financial Plan.

5 Background

5.1 The National Planning Policy Framework (NPPF) was published in March 2012. It emphasizes the importance of having an up-to-date Local Plan in place. The Local Plan is the new term to replace the Local Development Framework and comprises Development Plan Documents (DPD) such as Core Strategies and other site specific policies and plans. One of the core planning principles is that planning should be genuinely plan-led, empowering local people to shape their surroundings. Plans should be kept up-to-date and provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Without an up to date Local Plan in place, the

NPPF takes precedence in policy terms.

- 5.2 The Site Specific Proposals Development Plan Document (SSP DPD) progressed to Preferred Options Stage in October 2010. Over 400 responses were received at the Consultation stage but it was decided to pause progress due to:
- The review of the Joint Core Strategy (JCS) – in particular this will result in new housing targets
 - Publication of the National Planning Policy Framework (NPPF)
 - Commencement of Neighbourhood Planning – and uncertainties on where this should fit into the development plan process
 - Revocation of the Regional Spatial Strategy (RSS) – at the time legal advice was that a plan with new targets could not be progressed before the RSS was formally removed.
 - Limited staff resources and other priorities.
- 5.3 The Town Centre Area Action Plan (TCAAP) was adopted by the Council in July 2009. It was prepared in the context of national planning policy guidance and statements and was in conformity with the Regional Spatial Strategy for the East Midlands and the adopted North Northamptonshire Core Spatial Strategy (CSS) (June, 2008). The plan is in urgent need of review to ensure the policies remain up to date, to be consistent with the NPPF and to remain aligned with revised evidence being prepared for the JCS.
- 5.4 The Development Committee of 23 October 2012 received a report on various options for how to progress with preparing an up-to-date Local Plan. The Committee resolved that:
- (i) support be given to the preparation of the revised Joint Core Spatial Strategy;
 - (ii) a report be submitted to a future committee on the preparation of a housing trajectory to identify a 5 year supply of deliverable housing;
 - (iii) the preferred option be Option D, to prepare a Wellingborough Local Plan and to review the Town Centre Area Action Plan.
- 5.3 This report considers the resources implications for preparing the borough wide Local Plan over the review period, and the need to ensure that, once started, the review can continue through to Examination and adoption.

6 Discussion

- 6.1 The Development Committee of 23 October 2012 expressed a preference for the preparation of a borough wide plan (option D) that takes forward the work previously undertaken on the Site Specific Proposals Development Plan Document (SSP DPD) and a review of the Town Centre Area Action Plan (TCAAP). This would provide the most comprehensive and consistent policy cover for the borough and simplify the number of documents produced, making easier for the general public to understand. It also ensures that only one public examination is necessary, thereby saving costs.

- 6.2 It is not possible to prepare a borough wide plan with current staff and financial resources within a reasonable timeframe. At the time of preparing the SSP DPD to the preferred options stage there was an additional Planning Officer and a Senior Planning Officer both paid for through Planning Delivery Grant (PDG) together with a Head of Planning Policy who was actively involved in preparing the plan. The team was also supported by a Spatial Planning Advisor and a full time Technical Officer, who were both involved in plan preparation.
- 6.3 Following restructure in 2011 there are now only 1.8 full time equivalent (FTE) planning officers engaged with planning policy supported by 0.5 FTE of a Technical Officer, together with a part time 0.5 FTE Principal Planning Manager. For comparison purposes East Northants Council currently has a planning policy team of 7 and Corby has a team of 5. There is a need to increase staffing levels to ensure that the review process takes place within a reasonable timescale, to ensure that the evidence base for the plan remains up to date.
- 6.4 Whilst progressing development plans is a key priority, there are other functions that this service also needs to provide in addition to general day to day inquiries including:
- continuing to play a prominent role in the development of the emerging North Northamptonshire Core Strategy and joint evidence base
 - providing local communities with professional support in the development of Neighbourhood Plans and associated projects
 - managing and implementing the Community Infrastructure Levy, to ensure that the District receives the full benefits of it
 - reviewing S106 policy and projects
 - preparing supplementary planning documents (SPD's)
 - monitoring development completions and preparing the Annual Monitoring Report
 - preparing housing trajectories and calculating the 5 year supply of housing
 - supporting Development Management with policy advice on major applications
 - supporting other Council projects such as the Stanton Cross CPO
 - keeping up-to-date with and advising the Council on emerging national policy and guidance
 - Assessing and commenting on Plans by neighbouring authorities
- 6.5 A broad outline of the stages of plan preparation is set out in Appendix 1. The amount of time the review process takes is fundamentally related to available resources in terms of both sufficient staff and monetary resources being available at the right time in the process to pay for consultants and the Examination in Public. The plan will also need to be supported by other documentation including a Sustainability Appraisal and Strategic Environmental Assessment together with a Habitats Regulations Assessment.
- 6.6 The timetable associated with the existing TCAAP was commenced in 2006 and was adopted in July 2009. Much of this work was undertaken by external

consultants at an overall cost of approximately £250,000. Kettering Borough Council commenced work on their TCAAP in Nov 2006 and it was adopted in July 2011, they had 4 planning officers working on the plan at the time. Northampton Borough Council had an issues and options paper for their Central Area Action Plan in autumn 2007 and they submitted the plan in May 2012, the examination is currently ongoing. The existing Core Strategy was commenced in 2005 and was adopted in 2008. The review of the Core Strategy started in 2009 and is ongoing with adoption anticipated during the summer of 2015. The timetable for the review of the Local Plan could take three years as long as additional resources are made available.

- 6.7 It is suggested that at least 2 additional Planning Officers, together with some additional time for the Planning Policy and Regeneration Manager would be required at a total cost of approximately £87,00-£91,000 per annum (including on costs) to progress the plan within a reasonable timescale. These members of staff would be needed for up to 3 years. Without additional resources, the review process could take in excess of five years, meaning that there is a serious risk of the evidence that is necessary to underpin the plan becoming out of date before being able to be tested at Examination in Public, a key stage in the process.
- 6.8 A certain amount of evidence gathering has already taken place for the preparation of the SSP DPD, the adopted TCAAP and the review of the Core Strategy, however site specific investigations and more detailed assessments, and an updating of evidence would be needed. It is suggested that in the region of £110,000 would be needed to be set aside for specialist consultant support. Much of this would be required in the early stages of the project as it forms the evidence base for preparing the plan, however some elements are necessary in the later stages.
- 6.9 The plan needs to be prepared with full stakeholder and public engagement and there are also several formal stages of public consultation required. There will therefore need to be funds set aside for public consultation including preparing consultation material, exhibitions and sending letters. This is expected to cost approximately £20,000.
- 6.10 The plan will need to be subject to an Examination in Public (EIP) by an independent inspector which is likely to be in the 3rd year of the project.

7 Legal powers

Plan making powers are contained within the Planning and Compulsory Purchase Act 2004. Regulations governing the making of plans are contained within the Town and Country Planning (Local Planning) (England) Regulations 2012.

8 Financial and value for money implications

- 8.1 In total, assuming that sufficient staffing and resources are made available, the review of the Local Plan over a three year period is likely to cost the following:

Year	Costs	Components
1	£172,000	£87,000 staff £75,000 consultants £10,000 consultation
2	£135,000	£90,000 staff £35,000 consultants £5,000 consultation
3	£229,000	£91,000 staff £5,000 consultation £133,000 EIP
Total Cost	£536,000	

- 8.2 A total of £536,000 is needed to allow us to develop a Local Plan for the borough of Wellingborough. £172,000 is needed in the first full year of the review (2014/15), £135,000 in 2015/16 and £229,000 in 2016/17.
- 8.3 At present there is a total fund of £214,000 in reserves allocated for planning purposes that could be put towards the total cost of the review. This comprises £133,000 which was set aside for the EIP. A further £50,000 is available from the additional planning burdens imposed by the Localism Act and £31,000 from the budget dealing with Section 38 highways matters (these functions have now been passed to the County Council and do not require this money). A small amount of funds from these existing reserves is to be spent in the remainder of this financial year (2013/14) in preparation for the review in the region of approximately £8,200 which accounts for additional staff time and consultancy work for the Town Centre Health Check.
- 8.4 There is therefore a current anticipated shortfall of £330,200 which will be required to complete the review of the Local Plan, once the current level of resources in reserves is utilised. As it will be necessary to recruit staff for a temporary period to undertake the review, this report seeks to ensure that the remaining costs of the review are allocated from existing general reserves to cover the entire review process to ensure value for money.
- 8.5 The value for money aspect would be realised once the plan is adopted. This would include the defence of decisions made by the Planning Committee would be based on more robust policies and more likely to be successfully defended. This would reduce the cost of appeals. In addition, the allocation of homes provides developer certainty and encourages the building of homes and business premises with a receipt of Homes Bonus, and Business Rates and importantly homes for people who are or could be potentially homeless, an unknown financial burden on council each year.

9 Risk analysis

Risks of the various options for progressing with local policies were set out in the report to Development Committee of 23 Oct 2012.

Nature of risk	Consequences if realised	Likelihood of occurrence	Control measures
Not providing resources to support preparation of a borough wide local plan	Existing policies become out of date and decisions would need to be made on national policy only. The number of appeals and associated costs is likely to rise.	High	Provide additional resources as identified

10 Implications for resources

Two additional planning officers are recommended initially on a 2 years fixed term contract to be extended for up to a further year if required.

11 Implications for stronger and safer communities

None directly arising from this report. Any plan eventually prepared will cover matters relating to health improvement, community cohesion, and community safety matters and will be assessed as part of a Sustainability Appraisal.

12 Implications for equalities

None arising directly from this report. For any plan, once it moves to delivery phase, the impact of the plan on different groups in society will be considered as part of the Sustainability Appraisal. An Equalities Impact Assessment Screening will also be undertaken.

13 Author and contact officer

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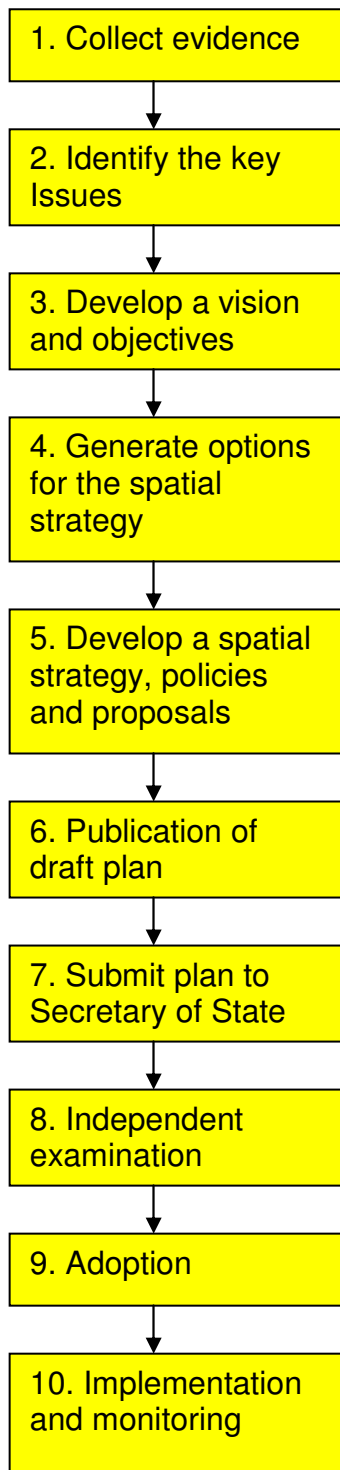
Consultees

Steven Wood, Head of Planning and Local Development
 Victoria Phillipson, Principal Planning and Regeneration Manager
 Sue Bateman, Senior Planning Policy Officer
 Tracey Cave, Service Accountant

14 Background papers

None.

Local Plan Preparation Stages



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Sustainability Appraisal

