3 PLANNING POLICY CONTEXT

3.1 This Chapter considers the current planning policy context, recent development trends and land supply issues which provide the starting point for the consideration of the spatial development options set out in Chapter Six.

Regional and Strategic Planning Guidance

3.2 The study area as defined in Chapter One is covered by two sets of regional planning guidance, three structure plans, two unitary development plans and eleven local plans.

3.3 Regional Planning Guidance for the South East (RPG 9, March 2001) includes coverage of the counties of Bedfordshire and Buckinghamshire and sets out the planning framework for the region until 2016[17]. The vision for the region as set out in RPG 9 is one of encouraging economic success and opportunity, ensuring a higher quality of environment, and a more sustainable pattern of development. RPG 9 sets out 12 development principles which are summarised as four key features or objectives:

- urban renaissance and concentration of development – an acknowledgement that urban areas should be the main focus for development and that a less dispersed pattern of development than that achieved in the past is required;
- economy in the use of land;
- integrated land use and transport; and
- securing a multi-purpose countryside.

3.4 RPG 9 identifies the Luton, Dunstable and Houghton Regis conurbation as a Priority Area for Economic Regeneration. The RPG cites the lack of prosperity in this area as running counter to the principles of sustainable development and the need to make best use of resources, including land and people. RPG 9 also identifies Milton Keynes as one of two potential growth areas in the region.

3.5 The second set of regional planning guidance which covers part of the study area is Regional Planning Guidance for the East Midlands (RPG 8, Jan 2002) which includes the county of Northamptonshire. RPG 8, which covers the period to 2021, sets out similar core objectives and policies to RPG9. RPG 8 divides the East Midlands into five sub-areas and the Southern sub-area includes Northamptonshire. The key policy for this sub-area is that Northampton's role and function as the major population and employment centre should be fostered by new transport infrastructure and facilities to support its anticipated future rate of growth. Another objective for the southern sub-area is the population-led regeneration of Corby.

3.6 The three structure plans which cover the study area – those for the counties of Bedfordshire, Buckingham and Northamptonshire – were approved before the publication of the current versions of RPG outlined above, and in the case of Bedfordshire and Buckinghamshire plans, before the review of PPG 3 Housing (March 2000). Therefore, whilst the three plans share the themes of urban concentration and giving priority to the re-use of previously-developed land, the full implications of the "plan, monitor and manage" approach to planning and the use of increased densities and urban capacity studies have yet to be fully reflected in both these plans and the constituent district local plans.

3.7 The major areas of growth and pattern of development proposed by each structure plan are summarised below.

[17] Bedfordshire now falls within the East of England region and future guidance for the County will be set out within the emerging RPG 14 which reviews and replaces RPG6.

Northamptonshire

3.8 Both the current Northamptonshire structure plan and RPG 8 promote the continued growth of Northampton town as the major centre of population and economic activity in the southern part of the East Midlands. The Plan identifies land for a further 19,300 dwellings and 390 ha of industrial and commercial development within the Northampton Policy Area (Northampton and land adjacent to the Borough's boundary in neighbouring districts) in the period 1996-2016.

3.9 Elsewhere within the County, the structure plan requires growth to be accommodated within four large-scale mixed-use urban extensions, referred to as "Strategic Development Areas" (SDAs). SDAs are intended to be large-scale mixed use urban expansions of a minimum of 1,000 dwellings and 40 hectares of industrial and commercial land. SDAs are proposed at Daventry, Desborough/Rothwell, Towcester and east of Wellingborough. The structure plan originally proposed a fifth SDA to the south of Northampton (within the Northampton Policy Area) but this was quashed following a legal challenge by South Northamptonshire District.

3.10 Corby is also identified as a focus for net in-migration into the County, with the underlying objective of stimulating a population-led regeneration of the town.

Bedfordshire

3.11 Within Bedfordshire, the current structure plan shifts the balance of new development to the north of the County where land constraints and congestion are less severe. Accordingly, 70 per cent of the Plan's requirement for 49,300 dwellings 1991-2011 is to be accommodated within Bedford and Mid Bedfordshire Districts.

3.12 Development pressure is being accommodated within and adjoining the main urban areas and in the strategic transportation corridors, South West of Bedford (focused on the A421) and East Bedfordshire (focused on the A1). One of the issues being explored through the Bedfordshire and Luton structure plan review is the north south distribution of housing and the potential for Green Belt release

North Buckinghamshire

3.13 In recognising the development constraints in the south of the County, and the increasing regional role of Milton Keynes, the Buckinghamshire structure plan proposes the concentration of approximately 82 per cent of all new housing development 1991-2011 in the northern two districts of the County; Milton Keynes and Aylesbury Vale. The Plan provides for 57 per cent of the total County housing requirement to be in Milton Keynes. Accordingly, the Plan requires the growth of Milton Keynes by 20,000 dwellings in the period 1991-2001. Whilst the structure plan envisages this rate of development falling to an average 1,670 dwellings in the period to 2011, RPG 9 identifies the Milton Keynes area as a potential growth area over the next 20-30 years.

3.14 In Aylesbury Vale, the structure plan requires 8,600 new dwellings 2001-2011. The bulk of this development will be accommodated within two mixed use Major Development Areas on the northern fringe of Aylesbury Town.

3.15 The strategic framework across the study area is currently being reviewed. Both Bedfordshire and Buckinghamshire are at the early stages of structure plan review which will take account of the provisions of RPG 9. Whilst the housing requirement for Bedfordshire and Buckinghamshire 2001-2006 as set out in the current RPG 9 is broadly in line with that required by the current structure plans, these are subject to review following consideration of the authorities' urban capacity studies and the studies of the potential growth areas. In Northamptonshire, RPG 8 proposes a reduction in the housing numbers for the County from the 3,150 dwellings per annum set out in the current structure plan to a figure of 2,750 dwellings per annum. Northamptonshire County Council has now commenced its review and is expected to publish an Issues Paper in the late summer / early autumn of 2002.

Recent Development

3.16 Rates of residential development for each district are shown in Figure 3.1 on the next page. The key points to note are that:

- Total completions across the study area in the period 1991-2001 amounted to 76,279 dwellings, equivalent to 7,628 dwellings per annum. This is 10 per cent less than the average annual structure plan requirement of 8,476 dwellings p.a. during the same period.

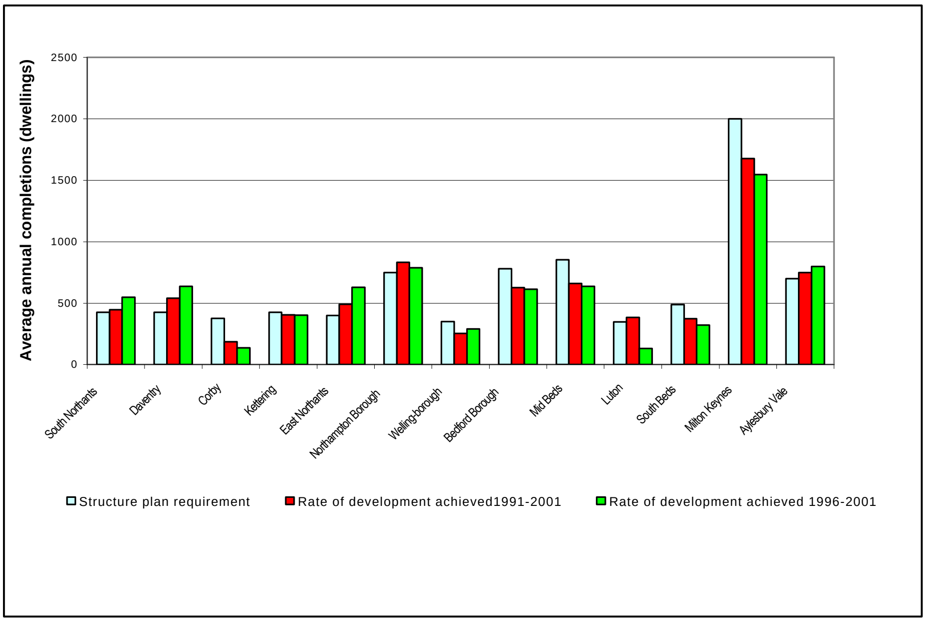
- **Milton Keynes** has experienced higher levels of housing growth than other parts of the study area, equivalent to 22 per cent of total completions 1991-2001 at an average of 1,677 dwellings per annum. However, even at these levels the rate of growth in Milton Keynes has been 16 per cent below that envisaged in the structure plan. An analysis of past completion rates shows that development rates of around 2,000 dwellings p.a, as implied by the current structure plan, have only been achieved at a time when there was a well resourced Development Corporation in operation. Whilst market sector completions in Milton Keynes have been reasonably constant in the recent past, it is the number of completions in the affordable sector which has fallen markedly.

- Conversely, the rate of growth in **Aylesbury Vale** has slightly exceeded structure plan expectations.

- The rate of development achieved within the last ten years in **Northamptonshire** is broadly in line with the 3,150 completions p.a. envisaged in the current structure plan (1996-2016). However, during the past five years the rate of development has increased to a level in excess of the requirement. Within the County, Daventry and South and East Northants Districts are affected by the development pressures arising from the south-east and have been experiencing high levels of both housing and employment growth. Conversely, in Kettering and Wellingborough Districts housing take-up has been relatively sluggish. Corby stands out as having achieved a ten-year average approximately a half the level implied by the current structure plan.

- A contrasting situation can be seen in **Bedfordshire** where average completions have lagged well behind implied structure plan averages. Between 1991 and January 2001, the average completion rate being achieved in the County was 2,044 p.a., some 17 per cent below implied structure plan levels for this phase.

Figure 3.1 : Rates of Residential Development



3.17 Stakeholders have suggested that the reasons for under-achieving the structure plan target include:

- Delivery of housing is often dependent upon a few large schemes. In many areas, future housing provision is concentrated within one or two major sites (eg Oakley Vale in Corby and East of Wellingborough). This involves complex master-planning, land assembly and implementation. Slow progress in delivering these sites depresses development rates.

- The provision of funding for infrastructure is complex and time consuming. Section 106 agreements are considered to be cumbersome and time-consuming to negotiate.

- The current rate of development across the study area might be seen as a “natural” rate given the current complexity and resourcing of the planning system and the capacity of the housebuilding industry to resolve infrastructure constraints.

3.18 HIP returns suggest that completions of RSL and local authority dwellings are running at about 10 per cent of the average annual completion rate

3.19 On the other hand, information collected by Bedfordshire County Council[18] shows that 3,292 affordable dwellings were completed in the County (excluding Luton) during the nine year period 1991-1999, equivalent to 20 per cent of all completions. However, it is noteworthy that private development contributions to the supply of affordable housing provided only 16 per cent of all affordable housing completions in the County. The remaining 84 per cent were provided through local authority/housing association initiatives.

Local Housing Statistics

3.20 Within Milton Keynes District (as opposed to just CNT/English Partnerships land), affordable housing completions have contributed an average of 28 per cent of all residential development (with 20 per cent being available for rent and 8 per cent available through shared ownership) in the period 1991-2001.

[18] Planning for Housing in Bedfordshire (Dec 2000)

This figure has fallen from a peak of 42 per cent in 1991/92, the time of the cessation of the Milton Keynes Development Corporation, to a low point of 18 per cent in 1998/99.

Planned Development

3.21 This part of the Chapter considers the amount of land for housing and employment that is already in the development pipeline.

Residential Land

3.22 Table 3.1 below, summarises the supply of residential land within the study area. Overall, there is a total estimated supply of approximately 127,000 dwellings over the period to 2031. This represents a very significant supply of land for housing, equivalent to 16.6 years supply when compared to the average completion rate in the period 1991-2001. The contribution that the individual components of supply make, when compared to past development rates is set out below:

- At 31,010 dwellings, sites with planning permission equates to approximately four years supply.
- At 84,750[19] dwellings, the stock of permissions **and** outstanding development plan allocations[20] (commitments) equates to 11 years supply.
- Commitments plus urban capacity equates to 97,700 dwellings, equivalent to over 13 years supply.

Table 3.1 : Residential Land Supply

	Land with Planning Permission	Outstanding Devt. Plan Allocations	Estimate of Additional Urban Capacity	Windfall Estimate 2001-2011	Windfall Estimate 2011-2021	Windfall Estimate 2021-2031	Total
Northants	17,610	17,420	6,800	3,200	4,210	4,210	53,450
Beds.	6,090	15,400	2,350	3,540	4,350	4,350	36,080
North Bucks	7,310	20,920	3,800	1,070	2,600	1,650	37,350
Study area	**31,010**	**53,740**	**12,950**	**7,810**	**11,160**	**10,210**	**126,880**

Urban Capacity and Windfall Development

3.23 Capacity for 42,000 dwellings is expected to come forward in the period to 2031 through urban capacity and windfall development. Our initial source of urban capacity estimates has been from published capacity studies. For those authorities without such studies, our estimates have been drawn from sources such as National Land Use Database returns and discussions with planning officers. All of our estimates have been agreed with officers from the relevant local authority. On initial analysis, the total estimate for urban capacity of 13,000 dwellings may appear surprisingly low. The reasons for this are summarised below:

- To avoid double counting, we have stripped out sites which are already included within our estimates of commitments.
- Estimates exclude any allowance for increasing the density of outstanding development plan allocations; we address this point later in the Report.

[19] This includes Phase 2 of development at Elstow Storage Depot and the "policy commitments" of Strategic Development Areas at Daventry, Towcester and Desborough/Rothwell.

[20] For the purposes of this Study this includes allocations in both adopted and emerging local/unitary development plans.

- on-going windfall allowances have also been separated from estimates of urban capacity in order to prevent double counting.

3.24 Our urban capacity estimates are therefore limited to "one-off" urban capacity from the identification of new sites in urban areas.

3.25 Given the overall high level of residential land supply – approximately 127,000 dwellings – there appears to be a high degree of "fix" in the location of new housing expected to come forward in the first half of the Study period. When compared to average county completion rates for the past ten years, commitments plus estimated urban capacity equates to an identified land supply of just under 12 years in Bedfordshire and just over 13 years in North Buckinghamshire and Northamptonshire. However, only four years of estimated supply relate to sites with planning permission. The bulk of committed supply relates to outstanding development plan allocations. These can be reviewed. However, if the pattern of future development within the study area over the first half of the plan period is to be altered, a radical approach would have to be adopted in forthcoming reviews of development plans.

Density of Development

3.26 Table 3.2 below sets out the densities assumed by the local authorities in calculating the capacity of their outstanding development plan allocations.

3.27 Both PPG 3 and RPG 9 encourage development of between 30-50 dwellings per hectare. Whilst RPG 8 has no such specific policy, the Northamptonshire County structure plan does require new housing development to take place at a minimum net density of 35 dph. As Table 3.2 illustrates, densities assumed by the local authorities are towards the lower end of PPG 3 guidance, and at Kettering, significantly below it. In our view, there is significant potential for increasing the contribution that outstanding plan allocations can make to the housing supply by increasing densities. Development in major urban areas ought to be at densities somewhat higher than the minimum average suggested in PPG3. We highlight the effects of this when we consider the spatial options in Chapter Five.

Table 3.2 : Densities of Outstanding Development Plan Allocations

District	Average Net Density (dwellings per hectare) of Development Plan Allocations
Corby	30 dph
Daventry	30 dph
East Northamptonshire	30 dph
Kettering	23 dph
Northampton	35 dph
South Northamptonshire	32 dph
Wellingborough	35 dph
Bedford	30 dph
Mid Bedfordshire	31 dph
South Bedfordshire	37 dph
Luton	50 dph
Aylesbury	37 dph
Milton Keynes	36 dph

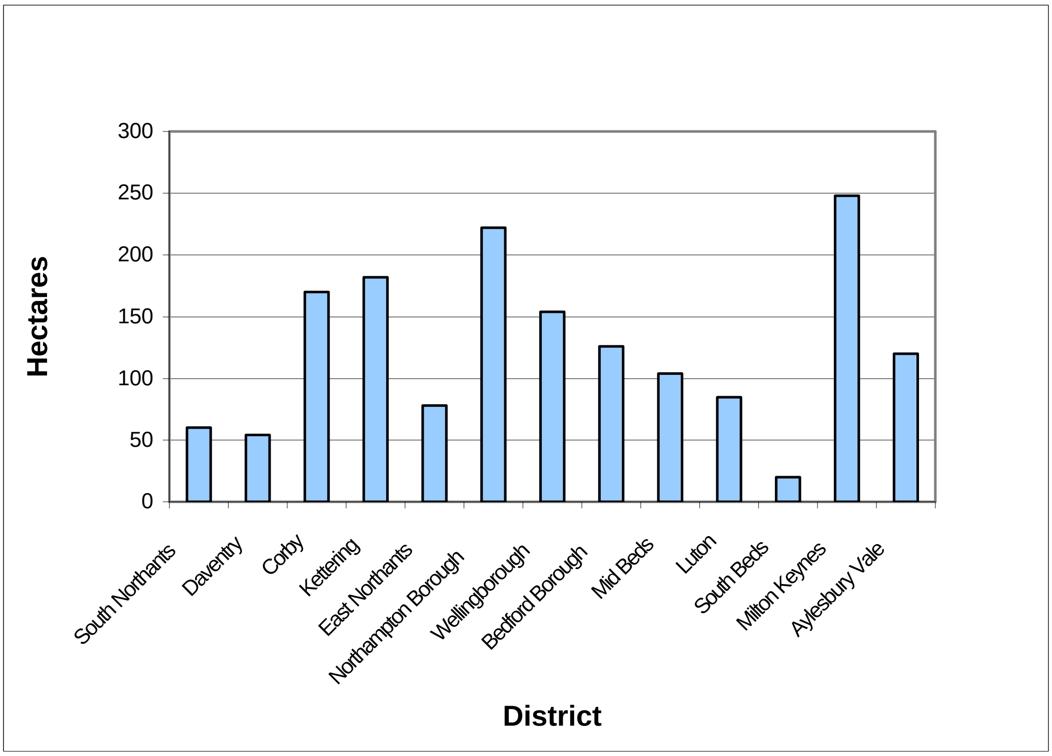
Employment Land

3.28 So far in this Chapter we have concentrated on residential land supply. This is because it is the most "land hungry" of the land uses being considered. We now look at trends in employment land supply.

3.29 As far as recent trends in employment land supply across the study area are concerned, direct comparisons are hampered by a lack of up-to-date information and a lack of uniformity in the approach taken to employment land provision and monitoring. For example, whilst the Northamptonshire structure plan requires the provision of a specific amount of land, the Bedfordshire and Buckinghamshire structure plans do not. In addition, Northamptonshire districts only record the gross take-up of employment land whilst districts in Bedfordshire record net employment land take-up (i.e. taking account of employment land lost to other uses).

3.30 Figure 3.2 shows the employment land supply for each district as at the latest available monitoring date.

Figure 3.2 : Latest Estimate of Employment Land Supply



3.31 The key points that available information reveals are summarised below.

- Those areas planned for the largest amount of employment growth are Milton Keynes and Northampton. Aylesbury Vale also has a high level of employment commitments. as do Kettering and Corby

- The greatest annual take-up of employment land has been at Milton Keynes where the 1996-2001 average take-up has been 32.3 ha p.a[21]., more than double that achieved by Northampton, the district which has experienced the next largest level of employment growth.

- The supply of employment land in North Bedfordshire (Bedford Borough and Mid Bedfordshire) appears to be reasonable. There are significant employment sites in the pipeline (for example, land

21 Figure includes take-up of all industrial and commercial land plus retail development

at Cambridge Road and the distribution depot at Marsh Leys, Bedford) and the proposed new settlement at Elstow Storage Depot [22] (including employment redevelopment).

- Kettering and Corby also have large amounts of identified employment land. The issue here is whether there is sufficient demand to take up this level of supply.

- Land supply within the southern part of Bedfordshire is highly constrained. Only 20 ha of land are available within South Bedfordshire District. Within Luton the planned Luton University Technology Park (Butterfield Park) has outline permission but has yet to be implemented. The third major site, 38-40 ha known as Century Park (to the east of Luton airport) needs a costly new access road which has so far prevented implementation of development.

3.32 However, it is not just the quantity of employment land that is of importance – it is also the quality. There is no comprehensive data source addressing this issue across the study area. However, in accordance with the provisions of RPG 8, an assessment of the quantity and quality of employment land in the East Midlands Region has been commissioned by the East Midlands Local Government Association and a similar exercise is being undertaken for EEDA (by Chesterton). The East Midlands Study[23] concludes that there is an extensive supply of good quality industrial and distribution land in the southern sub-region around Northampton. Outside Northampton, much of the land in Kettering, Corby and Wellingborough is of average quality including several constrained sites which are unlikely to come forward without public sector intervention.

Conclusions

- Unsurprisingly, the two sets of regional planning guidance which cover the study area conform with national planning policy in the core objective of achieving sustainable patterns of development. This is to be achieved by making the best use of previously-developed land and concentrating development where there is greatest opportunity to reduce the need to travel.

- Milton Keynes, Northampton and Corby emerge as key locations for future growth and the Luton/Dunstable/Houghton Regis conurbation as a priority area for economic regeneration.

- Recent housing development across the study area has been 10 per cent below the average annual structure plan requirement. The reasons for this would appear to relate more to implementation difficulties than a lack of demand or lack of development interest.

- In general terms, residential take-up has been most buoyant in Northamptonshire with take-up in Bedfordshire being the most sluggish. A fifth of all additions to the housing stock within the study area have taken place within Milton Keynes district.

- There is an estimated total residential land supply of approximately 127,000 dwellings within the study area. This is equivalent to 16.6 years land supply at past average completion rates. Excluding windfall provision, there is an identified land supply of between 11-13 years in each of the counties. There is therefore a high degree of "fix" in the pattern of future development over the first part of the Study period. There is further scope for increasing the amount of housing on these identified sites by increasing residential density assumptions.

- Significant amounts of employment land exist within Milton Keynes and Northampton districts. Conversely, the most constrained employment land supply is in the southern part of Bedfordshire.

[22] Existing structure and local plan allocation.

[23] "Quality of Employment Land Study" by Roger Tym & Partners, Business Strategies and Innes England (July 2002)