Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 148
Response Date 12/02/20 09:21
Consultation Point 9 Kettering and Barton Seagrave (View)
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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Section 9 - Housing Site Policies - Kettering and Barton Seagrave

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

Justified . No
Effective . No
Positively prepared . No
Consistent with National Policy . No

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.
Paragraph 9.1 of the Plan provides the context for housing delivery requirements to be provided within Kettering Borough during the plan period up to 2031. It states: “The housing requirement for the town is set out in the North Northamptonshire Joint Core Strategy is 6,190 in the period 2011-2031. The majority of this growth will be provided through the Kettering East Sustainable Urban Extension, known as Hanwood Park.” This statement acknowledges that the growth in Kettering is heavily reliant upon the delivery of Hanwood Park. Whilst it is acknowledged that development is well underway and there is a current extant outline permission, numerous reserved matters approvals and other consents for the housing delivery on site, the Council is aware that the time period to submit reserved matters on this permission expires on 31st March 2020. Our client has committed to a Planning Performance Agreement (‘PPA’) with the Council to agree to the submission of a new outline planning application largely based upon the current permission to allow for the continued delivery of the Hanwood Park development and all its associated housing, employment, infrastructure and other benefits. However, despite this and the Council’s reliance upon the development (e.g. for future housing delivery, 5-year housing land supply and other reasons) our client is surprised and disappointed that there is no associated allocation and Hanwood Park-site-specific policy included within the emerging Plan. For the reasons set out, our client considers that this should be remedied as soon as possible, for the Plan to be effective, deliverable and be ‘sound’. In addition, the justification for the housing trajectory as indicated in Appendix 1 of the SSP2 is unclear. Table 16.1 of the Plan shows a total of 3,525 completions on the Kettering East SUE between 2019/2020 and 2030/2031. However, the housing trajectory commits to the delivery of 5,500 homes by 2031. Since 856 dwellings of those commitments have already been approved, delivered or are in the process of being delivered, this would indicate a remainder of 4,644 dwellings (not 3,525 as suggested). This should be amended and clarified in the Plan.

Proposed Actions/Changes

Please explain what changes or actions are needed to make the Local Plan legally compliant.

In order to meet the tests of soundness in the NPPF, we would request the inclusion of an allocation, inclusion on the Proposals Map and additional housing site-specific policy in Section 9 of the Plan, identifying the Kettering East SUE (Hanwood Park) and seeking to support and reinforce the housing, employment, education, leisure, community and associated infrastructure commitments associated with the on-going development of the site. Whilst significant efforts are underway to ensure timely reserved matters are submitted and approved for the continuation of Phase 1 delivery at Hanwood Park, and for the “renewal” of the outline planning permission, there is currently no planning policy “hook” or justification to ensure the principles of the development endure in the emerging Plan and support any future applications, which are vitally important for the delivery of Hanwood Park as a sustainable urban extension to the town.

Attendance at the examinations hearings

If you are seeking to change the Plan, would you like to attend the examination hearings? Yes

If Yes, please outline the reason(s) why, below.

The land owned and controlled by Hanwood Park LLP (‘HPL’) comprises a significant proportion of Hanwood Park, formerly known as East Kettering Sustainable Urban Extension (‘SUE’). The site is shown in Figure 16 of the North Northamptonshire Joint Core Strategy 2011-2031 as a “Committed Principle Sustainable Urban Extension”. As principal promoter/ master developer of such an important large scale site within Kettering Borough Council’s administrative area, HPL consider it is essential that they are present and able to participate at any Examination hearing session(s) – if deemed necessary – in order to assist the Inspector by responding to any queries that may arise from the consultation, further representations on the Plan and supporting the soundness of the Plan.

Notifications
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<th>Do you wish to be notified?</th>
<th>- When the Plan is submitted for independent examination?</th>
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