Comments

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

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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?

Paragraphs 4.4 - 4.10

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

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.

This representation relates to the Housing Supply Background Paper, as referenced in Chapter 4 of the Publication Plan, with a specific focus on the commentary on the monitoring triggers in the North Northamptonshire Joint Core Strategy (NNJCS) and the Council's performance against these – Paragraphs 3.13-3.15. In this context, we note that the title to this subsection in referring to "Triggers" rather than "Trigger", acknowledges there is more than one monitoring trigger in the NNJCS, but commentary is only provided on the 25% monitoring trigger.

There is no reference to the second trigger (see 9.18 in the NNJCS) in this Paper, which relates to the performance of the SUEs against the trajectory in Annex A of the NNJCS. There is also no reference to the SUE trigger in the Publication Plan or the AMR, and there does not appear to be anything in the public realm that shows that Council have been monitoring the SUE trigger as required. Furthermore, these documents do not include the breakdown of the completion data for each year on a site by site
basis to date for us to consider how the Council has performed in this regard. This data is fundamental for a number of reasons and should be published. The breakdown of completions is not only important to see how the Council has performed against the SUE trigger, but would also set the wider context for considering how realistic the predicted completion rates going forward are and it would also enable us to consider how successful past predictions on delivery rates have been. The evidential burden in relation to ‘deliverable’ sites has increased since the adoption of the NNJCS and it is anticipated that further Position Statements will be produced in due course to evidence predicted delivery rates. Looking back at the past will provide a steer as to the level of scrutiny that should be applied to these statements.

The inclusion of the SUE trigger in the NNJCS was a result of the numerous concerns raised by the development industry during the examination of the NNJCS. In the Planning Inspectors report he concluded these concerns had merit and that a monitoring trigger should be included so that if the SUEs, as an important part of the house supply, faltered that the strategy could be reconsidered at that time. It is evident from the data available that the SUEs in Kettering Borough Council have not delivered as predicted, but the lack of data provided in this regard means it is not possible to comment further at this time.

The absence of the breakdown of past completions undermines the transparency of the process and does not allow for a full review of the Part 2 Plan and its relationship with the NNJCS.

**Proposed Actions/Changes**

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

A site by site and year by year breakdown of the completion figures since the start of the plan period should be provided. A review of the SUE monitoring trigger should be provided and appropriate commentary/actions stated if required.

**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.

In the absence of key data we would like the opportunity to discuss this data when it becomes available, including the implications of this and, if appropriate, the solution to any issues that might arise.

**Notifications**

Do you wish to be notified?

- When the Plan is submitted for independent examination?
- When the Inspector’s Report is published?
- When the document is adopted?