Comments

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

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Consultation Point 4 Housing (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?
Paragraph 4.8 - 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.

We consider that the Council has not provided the evidence to demonstrate a supply of deliverable or developable sites contrary to the provisions of Paragraph 67 of the Framework and the evidential requirements of the PPG.

We have reviewed the Housing Land Supply Background Paper 2019 and reference is made to the type of evidence that the Council's has considered to determine whether sites should be considered deliverable or developable and what delivery rates can be justified thereafter. However, none of this evidence has been provided for us to review. Without this evidence, major sites with outline permission, proposed allocations and sites on the brownfield register cannot be considered as deliverable and a 5 year supply would not exist.
The types of evidence needed are identified in the PPG Para 007 Ref Id 68-007-20190722. This evidence will also be essential in determining when the first completions are likely to be and assist in determining realistic delivery rates thereafter. In producing this evidence, it is important that the appropriate level of scrutiny is applied to the evidence to ensure that the figures represent a robust and realistic prediction based on the various factors relevant to that site. It is not sufficient, for example, to say this is what the developer / landowner has said.

We have seen through the trajectory in the NNJCS and the Joint Position Statements prepared in support of the NNJCS that for all the proposed SUEs that the predictions in terms of the starts on site and the delivery rates were overly optimistic. This demonstrates that careful scrutiny is needed in relation to the available evidence.

We have previously identified the difficulties being experienced with attracting a developer to delivery Desborough North. To our knowledge this remains the case.

In relation to Kettering East, this has split into 9 entries in the trajectory. When these are combined this results in the following predicted completions, which are substantially higher than those predicted through the NNJCS (a maximum figure of 280 in a year was previously predicted) for the next 5 years:

- 2019-20 152
- 2020-21 202
- 2021-22 235
- 2022-23 294
- 2023-24 325

It is important when reviewing the evidence available for these sites that they are not considered in isolation and they are considered collectively as well. The reason being that delivery rates on sites will reflect the demand from the market. The more outlets that are added to a site, the greater the competition and the slower the delivery rate per outlet.

There is clear evidence available that the completions predicted for Kettering East are well in excess of what have been delivered on other SUEs in North Northamptonshire and across the country in a variety of market areas. We would expect the evidence provided to demonstrate why this site is going to break new ground and deliver at these substantial rates.

Proposed Actions/Changes

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

The evidence to support the conclusions in relation to the following need to be published for review:

- which sites meet the definition of deliverable / developable,
- what needs to be done to secure completions on a site,
- the date completions will commence, and
- the predicted delivery rates thereafter.

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.

We would welcome the opportunity to provide our verbal submissions when the evidence has been provided for us to review, in order to discussions the implications of this and to discuss the solutions to any issues that might arise as a result.

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?