Comments

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

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Consultation Point Broughton (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?
Broughton

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.
1.1 On behalf of our client Pytchley Estate Settlement 1996 we object to the section of the Publication Plan- Site Specific Part 2 (SSP2) Local Plan related to the lack of specific planning policies related to the village of Broughton.

1.2 Broughton is a category A village with a large number of services and amenities including but not limited to a primary school, village hall and two convenience stores. Broughton is also considered to be the second largest village within the rural area and due to being located in close proximity to Kettering the village is considered to be a sustainable location for development.

1.3 Within the previous version of the Draft SSP2 Local Plan which was consulted upon in Summer 2018, Policy BRT01 set out development principles for Broughton. Additionally, allocations were made for housing (Policy BRT02) and Historically and Visually Important Local Green Spaces (HBI011 and HVI052). At the time when the Summer 2018 consultation was carried out Broughton had an advanced Neighbourhood Plan however it had not yet become a ‘made’ plan.

1.4 In the time between the Draft SSP2 Summer 2018 consultation and the current consultation, Broughton Neighbourhood Plan was ‘made’ and therefore is considered to form a part of the Development Plan. Broughton Neighbourhood Plan includes a 5-7 unit housing allocation on a site referred to as BT Exchange Church Street.

1.5 As a consequence to the Broughton Neighbourhood Plan becoming made, Kettering Borough Council have taken the decision that specific Broughton related policies and designations within the village would be removed, stating on page 107 of the Publication draft: “Broughton Neighbourhood Plan and Broughton Neighbourhood Development Order were formally ‘made’ at the Executive Committee meeting on 17th October 2018. These provide policies which shape development in Broughton until 2031. Please refer to the Broughton Neighbourhood Plan for planning policies specific to Broughton.”

1.6 Although Broughton Development principles are covered within policies are included within the made Broughton Neighbourhood Plan, it is our view that within the SSP2 Local Plan that housing allocations should be made in Broughton.

1.7 Broughton is a sustainable settlement which would be able to provide additional housing to meet the rural housing need for Kettering Borough Council authority area. The previous version of the SSP2 Local Plan contained an allocation for 20 dwellings within Broughton, whereas within the made Broughton Neighbourhood Plan only contains an allocation for 5-7 dwellings. We therefore consider that additional housing allocations should be considered within the SSP2 Local Plan within Broughton.

1.8 The Housing Land Supply Background Paper (2019) discusses how 11 housing allocations have been made in the rural area as part of the SSP2 Local Plan which cumulatively would deliver 149 dwellings. It is proposed that the remaining rural housing supply for the plan period will come through rural windfall development (total 108 dwellings).

1.9 We recognise that historically rural windfall sites have delivered a consistent number of houses however windfall sites are a finite resource and therefore possibilities for infilling have and will continue to diminish resulting in a significantly slower delivery. To assume that windfall sites in the rural areas will continue to be developed at a rate similar to the historic rate would be inappropriate given that the ‘easy win’ sites have already been developed. It is likely that future windfall sites will be more constrained and come forward at a significantly slower rate especially due to the tightly defined settlement boundaries for rural settlements within the SSP2 Local Plan.

1.10 Appendix 4b of the Housing Land Supply Background Paper (2019) provides the evidence base for the rural windfall allowance, however much of this evidence is based on historic windfall figures and current trends rather than expected future trends and is therefore not consistent paragraph 70 of the NPPF and therefore the plan is considered to not be consistent with national policy.

1.11 We also believe that the plan cannot be considered to be justified as the rural housing delivery has not been based on reasonable evidence justifying future windfall delivery, therefore the SSP2 Local Plan is not justified, thus we believe that the plan is not sound.

Proposed Actions/Changes

Please explain what changes or actions are needed to make the Local Plan legally compliant.
1.12 To reduce the reliance on rural windfall development we propose that additional housing allocations should be made within the most sustainable rural locations to reduce the reliance on windfall sites.

1.13 Representations were submitted on behalf of our clients as part of the Draft Plan Summer 2018 consultation which promoted land rear of 18-20 Glebe Road as a housing allocation. The site is well related to the existing settlement of Broughton and its infrastructure and is bound to its south and west by existing residential development. We are of the view that this site should be allocated as a housing development site within Broughton.

1.14 The site is not designated as Existing Open Space or Local Green Space within the made Broughton Neighbourhood Plan which could prohibit development and it is our view that the allocation of land rear of 18-20 Glebe Road as a housing allocation would reduce the Council’s reliance on windfall development to contribute to the Borough’s rural housing supply.

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.

To support the inquiry process if requested by Inspector

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?