Comments

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

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Consultation Point Policy ROT3 Land to the West of Rothwell (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 4.1 - 4.16
Policy ROT3

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.

On behalf of our clients, Parker Strategic Land, and further to our previous representations made in 2016, I write to promote the above site for inclusion in the emerging Site Specific Part 2 Local Plan (SSP2) for Kettering Borough. A plan identifying the proposed allocation and the Council's standard representation form are attached to this letter.

The land forms 7.86 Hectares of well-enclosed rectangular fields to the North of the town and East and North-East of the cricket club. There is an existing track off Desborough Road alongside the former garage site (currently in use as a car wash) that currently provides access to the land. The former garage site is within the control of our client and a new access can be established across the land to access the land at Rothwell North.

There are some mature boundary hedges and trees and the land is enclosed to the North by an 80-metre belt of mixed woodland for most of the length of the site boundary. There is a ridge running East-West through the site and a public right of way runs North-South through and beyond the site.

As you are aware, the site directly adjoins the allocated Rothwell North urban extension and has previously been favourably assessed by the Borough Council; the 2011 Strategic Housing Land Availability Assessment (SHLAA) identified the site as developable and to be considered as part of the allocated urban extension.

As recognised by the Borough Council and set out in the emerging SSP2 there is strong historic and current Development Plan support for further development at Rothwell. The former Northamptonshire Structure Plan identified Rothwell as a strategic development area and the first and current North Northamptonshire Joint Core Strategies both reiterate this role for the town.

Our clients support the vision for Rothwell set out in the emerging SSP2 including the aspirations to enhance the vitality and viability of the town centre. It is our view that these aspirations can only realistically be delivered if sufficient residential development is enabled at Rothwell to support expenditure in the town centre. On behalf of our clients we strongly contend that the residential allocations proposed in the emerging SSP2 will not deliver the accompanying vision.

As drafted, the emerging SSP2 identifies a housing need for Rothwell of 1,190 dwellings to be delivered within the plan period up to 2031. Our clients consider the approach to delivery of housing at Rothwell to be unsound for two principal reasons.

Firstly, emerging SSP2 is too rigidly applying the housing targets set out in the adopted Joint Core Strategy (JCS). The JCS was adopted in 2016 and takes no account of the Government's standardised methodology for determining objectively assessed housing need. SSP2 therefore seeks to provide insufficient housing in Kettering Borough as a whole.

Secondly, SSP2 sets out that, of the 1,190 dwellings needed at Rothwell, only 300 have been completed in the eight years of plan period to date. The emerging plan relies extremely heavily on the 700 committed dwellings proposed at the allocated Rothwell North urban extension which does not yet have any reserved matters consents and is running significantly late on projected delivery timescales. We contend that Rothwell North does not meet the definition of deliverable as set out in Government guidance and that, should development come forward at all, the limited access options provided for will prevent development at the rate envisaged in the emerging plan.

It is apparent from the emerging SSP2 as drafted that the Borough Council recognise the vulnerability of delivery at Rothwell. In order to meet the shortfall of housing provision at the town the Council has sensibly identified an additional residential allocation of 300 dwellings through proposed policy ROT3 - Land to the West of Rothwell. Our clients support the principle of an additional allocation at Rothwell for the reasons set out above, however we strongly object to the proposed allocation ROT3 as the wrong site has been chosen in order to effectively enable delivery.

The supporting text to proposed policy ROT3 states that the site will come forward later in the plan period because access to the site is dependent on the delivery of phase 3 of the allocated urban extension. This site is less sustainable that the site promoted by our clients for a variety of reasons but, most importantly, the dependency on access through another site makes the allocation ineffective and undeliverable within the plan period. For these reasons the approach of emerging SSP2 is unsound and the land at Rothwell North promoted by our client should be allocated to address this shortcoming.
We are able to confirm on behalf of our clients that the land is developable and deliverable and can be brought forward in association with the allocated Rothwell North urban extension. It would be our clear intention to work closely with the adjoining landowners to coordinate the design and layout of development in order to link the two sites and provide a second major access to the whole. It is, however, important to note that the delivery of the site is not dependent on the allocated site as we are able to provide our own independent access.

Our clients have been promoting this site for some years and technical survey work has demonstrated that there are no major constraints to development. In line with the Council's previous assessments there is nothing that we are aware of that would preclude this land being readily available for development to meet the needs of Rothwell, Kettering Borough and wider North Northamptonshire.

As set out in our previous representations, the proposals for the land would comprise housing and supporting infrastructure, extensive open space and landscaping. A housing density of 30 dwellings per hectare would yield approximately 200 dwellings and is eminently capable of delivering the Borough Council's aspirations for housing mix and affordable housing.

We would be very pleased to work with the Council proactively to bring this site forward as an allocation in the emerging plan.

**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 assist the Inspector in considering the appropriate housing target for Rothwell.

**Notifications**

Do you wish to be notified?