Comments

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

Comment ID 212
Response Date 12/02/20 15:52
Consultation Point 4 Housing (View)
Status Processed
Submission Type Email
Version 0.3

Representation

Please use a separate form for each representation.

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

Paragraph 4.4-4.10 and 11.8
Figure 18.8

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 have previously submitted representations to the Draft Version of the Part 2 Local Plan. In doing so we identified that the SUEs were not delivering at the rate predicted and raised our concerns about what these means about delivering the housing target for Desborough and for the Borough, and what this means for the 5 year housing land supply.

Our concerns in relation to the deliverability of Desborough North SUE remains, with little to no progress on this site since our previous representations. We are also aware that the other SUEs are not delivering at the rate predicted in the North Northamptonshire Joint Core Strategy. However, insufficient information has been published by the Council at this stage in order to allow a proper review of progress to date. Similarly the insufficient information / evidence has been published to determine whether a 5 year...
supply of ‘deliverable’ sites exist or whether a sufficient number of sites exists (with the additional flexibility as identified) to meet the housing need identified in the North Northamptonshire Joint Core Strategy. For example:

- The trajectory does not provide a site by site and year by year breakdown of the completions to date;
- There is no reference to the SUE monitoring target and how the Council has performed against this;
- The evidence that the Council states has been considered to show sites are deliverable does not appear to have been published; and
- Evidence has not been published to demonstrate why the influx in predicted delivery rates on Kettering East is justified.

Without this information our concerns remain.

We also remain of the view that where the Council cannot demonstrate a 5-year supply of deliverable site or a sufficient supply to meet the housing need across the remainder of the plan period that other sites will need to be allocated. In accordance with Core Strategy, these allocations should be focused on the Growth and Market Town’s, which includes Desborough.

My clients site is located on the edge of Desborough and has previously been given reference DE/067. As explained in our previous representations this site is subject to an outline application. Whilst concerns currently exist in relation to the principle of development due to the location of the site outside the settlement boundary, we maintain that the site is otherwise deliverable in accordance with our previous representation and our submissions through the outline application.

Should it be determined that additional sites are needed, then the landowner remains committed to its delivery and a revised application would be submitted for approval, before disposing of the site to a housebuilder. In this context we consider completions could be achieved within the next 5 years.

**Proposed Actions/Changes**

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

Add a policy to the plan that allocates the site known as Land off Harrington Road, Desborough for residential use.

**Attendance at the examination 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 order to provide a verbal update on the position surrounding this site and to answer any questions in relation to the deliverability of the site and what actions the landowner would take if the site was allocated to ensure its prompt delivery.

**Notifications**

Do you wish to be notified? 1. When the Plan is submitted for independent examination? 2. When the Inspector’s Report is published? 3. When the document is adopted?