Comments

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

Test of Soundness

Do you consider the Local Plan is sound in terms of being:

Justified
Effective
Positively prepared
Consistent with National Policy

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.

Relationship with the JCS

The JPDU considers that the Site Specific Part 2 Plan (SSP2) appropriately understands its relationship with the JCS - Part 1 of the Local Plan. This is clearly explained in the purpose and content section (paras 1.1-1.4). The SSP2 addresses non-strategic issues and does not duplicate policies within the JCS. The JPDU considers that the Plan provides appropriate local distinctiveness to the strategic policies of the JCS.

Para 3.4 of the SSP2 further acknowledges the non-strategic role of the Plan, setting out that: “The Joint Core Strategy allocates strategic housing and employment sites (Strategic sites are 500+ dwellings for housing sites and 5+ hectares for employment sites), the SSP2 allocates additional smaller scale sites to meet housing and employment requirements”. Policy DES6 allocates Land adjacent to Magnetic Park, Desborough (referenced as site D1) an 8.1ha site for B2/B8 uses, which is above the defined strategic site threshold of 5ha that is referenced in the Plan.

It is noted that the Sustainability Appraisal at para 11.3.95 sets out that the sites primary function is to “support additional employment opportunities locally” and “enables existing residents and those from the new developments to access jobs locally thus reducing the need for long distance commuting”. For transparency and clarity, the Council should explain in the supporting text to Policy DES6 why an employment site in excess of 5ha is being allocated in the SSP2. The 5ha threshold was used in the
JCS to focus the strategic plan on large sites that are critical to realising the spatial strategy. It also avoided burdening the JCS with smaller non-strategic allocations and saves Part 2 Local Plans from having to consider strategic sites. The JPDU considers that the key questions in relation to proposed Policy DES6 are whether it is consistent with the strategic policies of the JCS, and whether the scale and wider impacts of the site are of a strategic scale that can only be considered properly at a North Northamptonshire level. On the first question, the JPDU considers that the identification of employment land at the Market Town of Desborough is consistent with the spatial strategy set out in the JCS, which seeks to diversify and expand the employment base of the town. On the second question, the JPDU notes that the site boundary appears to be logical on-plan and that the impacts of developing the site have been assessed through the Sustainability Appraisal. We consider that the scale of the site, although greater than 5ha, is unlikely to result in significant impacts beyond Kettering Borough. For these reasons, and given the benefits identified in the Sustainability Appraisal, the JPDU is satisfied that the proposed allocation of Land adjacent to Magnetic Park is appropriate within the SSP2.

The SSP2 makes reference in Table 4.1 to the housing requirements set out by Table 5 of the JCS, with the overall target for the Borough being at least 10,400 new dwellings by 2031 consistent with the requirements in Policy 28 of the JCS (Housing Requirements).

Para 4.4 explains that the SSP2 allocates sites to meet the remaining housing requirement in each settlement. In addition to the minimum housing requirements, the SSP2 allocates enough sites to provide a 10% flexibility allowance above the JCS housing requirements in Kettering, Burton Latimer, Desborough and Rothwell. In addition to allocations, a windfall allowance has also been included as part of the supply.

Table 4.3 provides a summary of existing completions, commitments and SSP2 allocations and sets out the provision for an additional 2,576 homes in addition to the JCS requirement. Table 4.3 demonstrates that in all settlements the allocations included in the SSP2 will meet and exceed the housing requirements identified in the JCS.

It is considered that this approach provides a robust contingency to support housing delivery and is consistent with the provisions of Policy 29 of the JCS (Distribution of New Homes). This is taken forward by site specific allocations within the Borough (as detailed in Chapters 9-13) in addition to the SUEs of Kettering East (Hanwood Park, also known as a Garden Community), Rothwell North and Desborough North as well as other sources of housing supply. The site-specific policies identify specific site requirements, including for infrastructure.

ConclusionThe JPDU welcomes the progress made by the council with the SSP2. It is considered that the Plan is in conformity with the JCS and identifies the relevant local issues where additional guidance is required. It clearly recognises the existing policy framework within the JCS and the importance of not duplicating this. The JPDU will continue to support Kettering Borough Council in taking the SSP2 forward to submission and beyond this to the Examination.

Notifications

Do you wish to be notified?