Comments

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

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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
- Policy DES4 and Policy DES5
- Paragraph 4.1-4.16

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, Central England Co-op, and further to 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 55 Hectares of well-enclosed fields to the South-West of the town between the existing urban area and the A6 and is in the ownership of Central England Co-op Limited.

It is our view that the land is well located for new housing development. This view that has previously been established in evidence; the 2013 JPU Urban Structures Study identified Eastern expansion of the town (including this site) as the best opportunity for extending and “repairing” the network of routes and spaces to improve and enhance the structure of the town.

Development of this site would have a very pleasant outlook, good access to existing open spaces, excellent pedestrian and cycle connectivity to the town centre, existing schools and other facilities. When developed, the site would fit well with the existing urban structure and expand existing communities off Federation and Pioneer Avenues. The existing street pattern can readily be extended to accommodate new development.

The site has very few technical constraints and we are not aware of any issues that would prevent residential development being brought forward quickly. There are no legal or title issues affecting the ownership. Having been promoting the site for some years, our client is able to mobilise quickly and have already undertaken a range of technical assessments of the site. We would be pleased to share these assessments with you to aid your consideration of the site.

The site is located entirely within Flood Zone 1 and is not at risk of flooding. The site generally slopes Northwards towards the shallow valley floor and would drain naturally in that direction. There is a fall across the site of 5m from 120AOD to 115AOD at the Northern boundary. A SuDS scheme could easily be designed into a development scheme to provide a sustainable drainage solution. There are no known utilities or foul drainage issues affecting the site and the proximity to the existing urban area ensures all major utilities are close at hand to serve new development.

There are no known heritage issues that would inhibit development of the site. The site has been assessed as Grade 3 Agricultural Land and is not classed as best or most versatile. Phase 1 Extended Habitat Surveys have indicated that the impacts of any development can be mitigated, indeed the overall biodiversity of the site can be enhanced through development incorporating a comprehensive new landscape framework.

As drafted, the emerging SSP2 identifies a housing requirement for Desborough of 1,360 dwellings to be delivered within the plan period up to 2031. Our clients consider the approach to delivery of housing at Desborough 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 1,360 dwellings needed at Desborough, only 373 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 Desborough North urban extension which is running significantly late on projected delivery timescales. We contend that Desborough 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 Desborough. In order to meet the shortfall of housing provision at the town the Council has sensibly identified two additional residential allocations totalling 439 dwellings through proposed policies DES4 and DES5. Our clients support the principle of additional allocations at Desborough for the reasons set out above, however we strongly object to the proposed allocations DES4 and DES5 as the wrong sites have been chosen in order to effectively enable delivery. It is the view of our client...
that Manor Farm, Desborough offers significant sustainability benefits when compared to the proposed allocations in emerging SSP2.

**Proposed Actions/Changes**

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

Based on an assumed average density of 30 dwellings per hectare, the site is capable of accommodating at least 1,200 dwellings. It is our view that this site should be allocated now to address soundness deficiencies in the emerging SSP2 for the reasons set out below.

**Attendance at the examincations 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.

It would be beneficial to the examining Inspector to understand the deliverability of our client’s interest at Manor Farm and why it should be allocated in place of proposed policies DES4 and DES5.

**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?