Dear Mr Kemp

HEARING STATEMENT – MATTER 4 ‘DELIVERING THE HOISING REQUIREMENT’

KETTERING PART 2 PLAN EXAMINATION

Harris Lamb Planning Consultancy has been instructed by Tata Steel (UK) Limited to submit this statement in relation to Matter 4. This should be read in conjunction with the representations that Harris Lamb submitted on behalf of Tata Steel to the pre-submission consultations undertaken by the Council (User ID. 77; Comment ID 199).

4. Is the housing trajectory at Appendix 1 of the Plan realistic? Does it demonstrate a supply of deliverable sites and developable sites that would meet the JCS housing requirement for Kettering? What progress has been made on the Sustainable Urban Extensions (SUEs) allocated in the JCS and how has this been monitored? What assumptions have been made in relation to delivery rates and are these justified?

No, the housing trajectory is not realistic. The unrealistic assumptions about the delivery rates on the SUEs in JCS is a consistent trend that we have seen since the JCS was first adopted in 2008, through the review in 2016 and again in the Part 2 Plan. At every stage the Council’s in North Northamptonshire have overestimated the likely delivery rates and been overly optimistic on timings in relation to the SUEs. At every stage the Council’s response is to say things have not progressed as expected, but to them proceed to make the same overly optimistic assumptions again.

One mistake that is repeatedly made is that despite all of the issues and delays to date with the SUEs across North Northamptonshire, that further issues will not occur down the line. This is simply not realistic. These are complicated sites that are delivered over a long period of time. There are a range of factors that can influence delivery rates, some of which that can be managed, others than cannot. There will be further issues with delivery on these sites and whilst Kettering East will delivery housing over the remainder of the plan period, it will not achieve the numbers predicted by the Council.
We are now in a position where completions have been achieved on some of the SUEs, but this has been at nowhere near the rates predicted by the Council’s (apart from Weldon Park, but this was only predicted to deliver 60 houses a year). Of the larger SUEs, the most advanced is Priors Hall in Corby, but despite having up to 11 outlets operating at a time, it has still achieved nowhere near the numbers that Kettering are predicted on Kettering East going forward.

The Council are predicting yearly completion of in excess of 300 / 400 dwellings a year for the next 5 years and then 280 per annum thereafter. In its best year to date Priors Hall delivered 269 dwellings, but it’s average is below 200, and it is the average figure that we are looking for Plan, not what the maximum theoretical delivery could be if all the factors that influence deliver on a site of this size allow to optimise output. The Council may have spoken to the promoter and used this discussion to estimate numbers, but this method of predicted numbers has been used again and again in North Northamptonshire and, apart from Weldon Park where a delivery rate of just 60dpa was predicted, all of the other SUEs have not delivered on numbers put forward by promoters / developers either.

It is time to start predicted some realistic numbers based on actual delivery rates for similar SUEs to ensure that the right number and range of sites can be planned for.

**Monitoring**

In our representations to Reg 20 consultation, we queried where the monitoring triggers with in the JCS were being monitored. In response the Council pointed us to a committee report from July 2019 to the Joint Planning Committee. This showed that Kettering East has delivered 24%, 69% and 60% against the numbers predicted in the JCS for the years 16/17, 17/18 and 18/19 respectively, whilst Rothwell and Desborough North have delivered no dwellings to date, despite being predicted to have been half way through delivery by now. This falls well below the monitoring trigger in the JCS and does nothing to support the predicted completion figures presented by the Council in the Part 2 Plan.

**Desborough North**

In terms of Desborough North, it is our understanding that there are fundamental issues with its delivery. We understand that all of the housebuilders in the local market have looked at the site since it was granted outline permission, yet to date no deal has been done with the site owner.

The latest planning records for the site show that the owner has sought RM approval for a short section of road in 2019 (KET/2019/0138), along with variations to conditions to facilitate this section of road being built (KET/2019/0139 and KET/2019/0140). In other words, the landowner was seeking facilitate the implementation of the scheme to preserve the outline permission going forward. We are not questioning the landowners intention/desire to bring this site forward, but this latest round of applications would not have been needed if a housebuilder was interested in the site and if a deal
had been struck to bring this site forward. The fact that a housebuilder is still not on board suggests that there are some fundamental issues with the deliverability of the site.

With no housebuilder on the site and with no RM application submitted for any part of the permitted outline scheme, then there is nothing to support the Council’s prediction that completions will start this financial year and proceed year on year thereafter until it is complete.

Furthermore, there are clear question marks as to whether Desborough North will come forward and to what extent this site can be relied upon to deliver housing in Desborough going forward. This site was allocated by the JCS, so we are not suggesting it should be removed from the plan, because this is not possible. However, it does raise the question as to whether further sites should be allocated in Desborough to provide greater certainty that the housing target for Desborough is met? This question is particularly pertinent when Desborough North accounts for such a large percentage of the housing growth plan in Desborough and if it doesn’t come forward in full or in part it has the potential to leave a gapping hole in the supply of housing in Desborough.

It is our view that further sites should be allocated in Desborough to address this uncertainty. This could be done through applying a larger flexibility buffer in Desborough to take account of this uncertainty (this would need to be much larger than the current 10% e.g. 40%) or through the identification of reserve sites which could come forward if Desborough North does not deliver houses in the next 2/3 years. We have suggested this timeframe because enough time would need to be allowed for other sites to mobilise, secure planning consent and get onto site.

In this context, DE/064, which is owned by Tata Steel should be considered deliverable in accordance with our previous representations (see Comment 196). The site is available, has a housebuilder on board, requires limited upfront infrastructure and could come forward quickly if called upon.

Yours sincerely

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