Kettering Site Specific Part 2 Local Plan (SSP2) (2011-2031) Examination

Matter 14 – Monitoring and Review

Matter Statement by Kettering Borough Council

September 2020
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1. Introduction

1.1. This statement sets out the Council’s response to Matter 14: Monitoring and Review, questions 1 - 3, in respect of the following issues:

- Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals in conformity with the JCS?

1.2. The statement also addresses any representations which the Council considers are of particular significance or concern, where this is the case the relevant respondent number and comment id are provided.

1.3. All documents referred to in this statement are listed in Appendix 1, submission document numbers are provided throughout where applicable.

2. Matter 14 – Question 1: How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to progress?

2.1. Section 15 of PKB1 includes Table 15.1 which sets out the monitoring indicators associated with all policies in PKB1. Alongside this in Table 15.1 targets have been set for each monitoring indicator. These targets are primarily based on quantifiable elements of their policy.

2.2. The policies in PKB1 seek to provide more detail and locational specific development management policies in comparison to the more general strategic policies in the JCS. The implementation of these policies is monitored through an established Authorities Monitoring Report process which is undertaken on an annual basis.

2.3. The Council considers that the policies in PKB1 will be effective in reaching the targets, identified in Table 15.1, given that they will provide additional mechanisms to enable the facilitation of the development management process in the Borough. They should also assist with the implementation of development in the Borough and provide clarity to developers to deliver sustainable development. Specifically, in relation to the allocations in PKB1, these policies have been written to set out clear requirements for the delivery of these sites.

2.4. The purpose of allocating sites in PKB1 is to show those sites which the Council considers to be both suitable for the allocated use and are deliverable in the plan period. The inclusion of site policies in PKB1 seeks to provide greater certainty for developers in bringing these sites forward, where the principle for development has already been established and development of the site will be considered acceptable given it is conformity with the site specific policy as well as other policies in PKB1 and the strategic policies in the JCS.
3. **Matter 14 – Question 2:** How would the implementation of the Plan be monitored? Would it be effective? How would the results of monitoring be acted upon? What would trigger a review of the Plan?

3.1. The monitoring framework included in section 15 of the Plan (PKB1) should not be read in isolation given that it will operate alongside the monitoring framework in Table 9 of the JCS.

3.2. The Council considers it appropriate to include monitoring indicators within a framework in the Plan which reflects the local focus for the Plan at a non-strategic level. Local authorities in North Northamptonshire provide data to the Joint Planning and Delivery Unit (JPDU) as part of the Authorities’ Monitoring Report (AMR) process. This process is well established and provides a comprehensive report on the progress of the JCS policies on an annual basis. Therefore, for this reason the monitoring that is undertaken on this Plan (PKB1) will be fed into the North Northamptonshire AMR, as is currently the case for the monitoring of the JCS, set out in paragraph 15.2 of PKB1.

3.3. The identification of data sources to monitor the indicators in Table 15.1 will be established prior to the first AMR, although this process will be assisted by the existing sources that allow the Council to input into the monitoring of the JCS through the AMR. This existing process allows for greater certainty in relation to the frequency of data collection.

3.4. The monitoring framework proposed in PKB1 will inform the approach to reviewing the Plan, as set out in paragraph 15.1. Through the annual monitoring process the Council will consider the progress being made on reaching the targets set out for each individual indicator. Once sufficient time has been given to allow for the implementation of these policies, the Council will consider whether sufficient progress is being made to trigger a review of the Plan, this could be part of or all of the document, as again, set out in paragraph 15.1 of PKB1. Alternatively, this could trigger other actions to assist in the implementation of policies.

3.5. However, the Council also recognise the requirement for LPAs to review policies at least once every five years in paragraph 33 of the NPPF. The considerations that need to be made as to whether a change to Plan is required through a review are set out in NPPG (Paragraph 65). The Council will consider these matters in assessing the need for any update to the Plan.

4. **Matter 14 – Question 3:** Overall does the plan deal adequately with uncertainty?

4.1. The Council recognises that it is important that the Plan is robust and is flexible enough to deal with issues and unforeseen changes in circumstance and risks that may arise over the plan period.

4.2. The Council considers that PKB1 has suitable contingency within the plan through the provision of a supply of housing land in excess of the housing
requirements in the JCS. 12,976 dwellings are provided for in PKB1 compared to the 10,400 dwelling requirement in the JCS (including a 10% flexibility allowance where appropriate), this evidently demonstrates adequate contingency and flexibility to meet the objectively assessed need. It also ensures that if some sites are slower in coming forward than anticipated, adequate supply will be available to deliver the requirements in the Plan period, meaning the over provision adequately deals with any uncertainty of the delivery on these sites, whilst allowing the Council to meet its housing requirement within the plan period.

4.3. Although concerns have been raised relating to the delivery of SUEs in the Borough, as shown through representations both on the Draft Plan (PKB4) and Publication Plan (PKB1), the Council are confident that the quantity of housing required in the plan period will be delivered.

4.4. In addition to housing, EMP1 sets out the significant over provision of employment land in the Borough without the allocations identified in PKB1. Whilst sufficient contingency may have been in place without the allocations, the Council consider that providing additional choice in the market will only assist in providing greater certainty and flexibility to ensure the needs of the Borough’s economy are met to ensure the delivery of economic growth within the plan period.

4.5. Alternative strategies and potential risks to the plan are addressed as part of the Council’s response to Matter 2 relating to the Sustainability Appraisal. Should serious risk be identified to require a review of the spatial strategy in the JCS, this would be strategic matter and would only be considered through a review of the JCS.

4.6. The Viability Assessment (VIA1) of the Plan was undertaken by Aspinall Verdi. This assessment tested the impacts of the plan focusing on the affordable housing targets and s106.

4.7. Paragraph 9.18 of VIA 1 concluded ‘that the emerging Part 2 Kettering Local Plan is generally viable. The bulk of generic typologies, representing most of the sites and proposed units in the Borough can viably provide their affordable housing target i.e. 40% in the higher value zone and 30% in the mid value zone. In addition, the majority of scenarios show a viability surplus which can be used to fund Section 106 contributions where appropriate’.

4.8. The Council therefore consider that the Plan (PKB1) to be flexible and robust to respond to risks and issues that may become apparent within the plan period. Uncertainty has been considered, given the over provision of both housing and employment land, above that required by the JCS. Flexibility has also been provided within individual policies.
5. Conclusion

5.1. It is considered that the approach to monitoring provides clear guidance in respect of the plan’s monitoring targets through its focus on quantifiable data as part of an established data collection process through the AMRs for the JCS. Therefore, the Council consider that the Plan will be able to be monitored effectively to ensure timely delivery of its proposals in conformity with the JCS.
Appendix 1 – List of Reference Documents

PKB1 – SSP2 Publication Plan
PKB4 – Site Specific Part 2 Local Plan – Draft Plan consultation
EMP1 – Employment Allocations Background Paper
VIA1 – Site Specific Part 2 Local Plan Viability Study