

Appendix 2c - Desborough

Comment	KBC Response
<p>5. Policy DES03 Opportunity Environmental Improvements Sites in Desborough In order to avoid confusion, please use the correct road designations. The main road running through Desborough is the B576. At DE8, the location should be "The Gold Street/B576 junction". At DE9, the location should be "B576" rather than "The old A6".</p>	<p>Noted. The policy will be updated.</p>
<p>245. Chapter 10 Desborough Section 10.12 - settlement boundary - This is confusing bit the Pipwell road site was identified as a way to provide a suitable site to meet the housing allocation? I think this needs clarification.</p>	<p>The Pipewell Road site that you refer to is a discounted housing allocation (DE/063) and is therefore not included within the proposed settlement boundary for Desborough.</p>
<p>246. Table 10.2 The health check identified that in comparison to Rothwell and Burton Latimer, Desborough is visited less for shopping. There is a lack of specialist/independent shops, most people don't eat out in Desborough (although this may be better more recently).</p> <p>Visits last less than 1 hour.</p> <p>Peoples main dislikes were lack of larger supermarket, lack of clean toilets, derelict buildings, and would like those improved along with more parking. The SSP for Desborough has also identified that there is a decrease in all convenience / comparison / services shops and of those especially in comparison goods.</p> <p>Therefore that the town centre development points should be welcomed in general as ways to address some of these points and to encourage greater diversity of shops, increase employment and number of visitors to the town and the length of their visits.</p> <p>Redevelopment of the old dairy site would be good if it could be redeveloped as a medium sized food store and long term vacant units needs to be addressed.</p> <p>However, the Lawrence's site identified here as MIXED use - but this is not what has now</p>	<p>Noted. The text that mentions Lawrence's factory will be amended to take into account what was agreed at Executive Committee on 17th October 2018, where it was resolved that the Executive Committee identified the preferred option for the development of the Lawrence's site is Council housing.</p>

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<p>been agreed.</p>	
<p>248. Policy DES02 Opportunity Redevelopment Sites within Desborough b) Support for this statement re Lawrence site, e) what has happened to the shelter that was planned here?- would also like to know if there are more detailed plans for these points and if so DTC would like to see them.</p>	<p>Noted. KBC is not aware of any plans for a shelter on this site. These are opportunity sites and more detailed plans will be developed through the plan period, this policy will help guide development on these sites and sets out priority developments in the town centre.</p>
<p>260. Chapter 10 Desborough Policy ENV02 & Section 10.19 - Allotment provision - seems at odds with the S106 register (see KBC313) monies available and allotment provision within Desborough Open Space.</p>	<p>Noted. This section of the document will be updated to refer to the allotments planned at Desborough Green Space.</p>
<p>261. Table 10.1 Map at 10.20 Showing the Settlement Boundary excludes the land over Pipewell Bridge subject to planning application KET/2017/1030 where previously the site was included.</p>	<p>This area has been excluded from the proposed settlement boundary following a review in April 2018. This can be viewed in the Settlement Boundary background paper here: https://www.kettering.gov.uk/downloads/file/18271/settlement_boundaries_update_april_2018</p>
<p>262. Policy DES01 Desborough Town Centre Development Principles Policy DES01 - support and need to have the pedestrian bridge is built as per para f).</p>	<p>Noted.</p>
<p>293. Chapter 10 Desborough Chapter 10: Desborough identifies the development strategy for Desborough and includes allocations for residential development. No objections are made to the specific allocations in Desborough since the adopted JCS identifies a specific housing target for the town and allocations are made accordingly, but concern is raised about housing delivery and the delivery of affordable housing at the strategic allocations and other allocations in</p>	<p>The pre-submission plan will be accompanied by a background paper setting out additional information on the Council's housing trajectory and five year land supply position.</p>

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It is noted that the delivery of the Desborough North SUE has been delayed; outline planning permission was granted on 25th April 2014 (Ref. KET/2011/0235) but development has still not commenced. It is understood that additional funding for the main spine road for Desborough North has only recently been agreed; the main spine road will enable land parcels to be sold to housebuilders. It is also noted that Desborough North is only required to provide 20% affordable housings. It is assumed in the AMR 2016/17 that development at Desborough North would commence in 2018/19 i.e. the current monitoring year. This is clearly unrealistic since housebuilders have not been appointed for the development parcels, reserved matters have not been submitted, primary infrastructure has not been provided, and as such development has not yet commenced. These actions do take some time to complete, and need to be fully reflected in the housing trajectory for Draft SSKLP. It is likely that development at Desborough North will be further delayed, and at least two years later than assumed in the AMR i.e. 2020/21. As a result, it is concluded that 125 dwellings less would be delivered at Desborough North SUE during the 5 year period (2018/19 to 2022/23) than predicted in the AMR 2016/17.

It is also assumed in the AMR 2016/17 that the delivery of development at Desborough North would overlap with the delivery of the other strategic allocations in Desborough (DES04 and DES05). The delivery of housing in Desborough has historically been lower than other areas, with a total of approximately 100 dwellings per annum delivered across the town. Therefore, it appears unrealistic to assume that housing delivery rates would increase above historic levels, since all of the strategic allocations would be competing for housebuilders and purchasers. It is considered that assumptions in the housing trajectory about start dates or delivery rates at all of the strategic allocations in Desborough should be adjusted to reflect the housing market and historic delivery rates in the town.

It is also noted that Policy DES04 (Land off Buxton Drive and Eyam Close for 135 dwellings) and Policy DES05 (Land to the south of Desborough for 304 dwelling) do not state the

These proposed allocations are expected to provide 30% of the dwellings on the site as affordable housing in accordance with Policy 30 of the Joint Core Strategy. Policies DES04 and DES05 do not need to duplicate this requirement. Any development on these sites which does not provide this level of affordable housing will not be in conformity the development plan and will be resisted.

The affordable housing requirements have been tested through the examination of the JCS. The housing requirements in the JCS have been identified to meet housing need. There is no evidence to suggest there is a need to allocate additional land at Burton Latimer to meet affordable housing requirements.

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<p>affordable housing requirement for these strategic developments. Policy 30 in the adopted JCS expects developments in the designated market towns to provide 30% affordable housing. Desborough North SUE is required to provide 20% affordable housing. It is requested that the affordable housing requirements for the two strategic allocations in Desborough (DES04 and DES05) is stated. If policy compliant levels of affordable housing cannot be delivered at these strategic allocations, then it is requested that additional allocations are made so that affordable housing supply can be increased; the proposed development at land south of Higham Road in Burton Latimer could provide approximately 160 dwelling and retirement living accommodation, including approximately 48 (30%) affordable dwellings.</p>	
<p>311. Policy DES02 Opportunity Redevelopment Sites within Desborough b) The Lawrence's Factory site - Conversion of the factory building and re-use of the site providing for a main town centre use or mixed use with residential and parking (DE2). I support this as long as the site is redeveloped in a way which maintains the integrity and character of the buildings and minimises the loss of original structures and internal spaces and fixtures.</p>	<p>Noted. At Executive Committee on 17th October 2018, it was resolved that the Executive Committee identified the preferred option for the development of the Lawrence's site is Council housing.</p>
<p>398. Policy DES04 Land off Buxton Drive and Eyam Close DE/212: We would advise that recreational threats to Tailby Meadow Local Nature Reserve (supporting MG4 habitat) needs to be considered in combination with DE/210. Any potential impacts identified in the SA should be addressed by proposing sufficient mitigation which should then be included in the policy for this allocation.</p>	<p>The requirement for mitigation of the impact on Tailby Meadow will be included within Policy DES04. Although, as outline planning permission has been granted on the site (KET/2016/0044), the issue of mitigation will be dealt within through the planning application process.</p>
<p>399. Policy DES05 Land to the south of Desborough DE/210: Please see comments above, and previous response dated 23 February 2016. Although we note that this permission has already been granted.</p>	<p>Noted.</p>
<p>416. Policy DES05 Land to the south of Desborough DE/210 We note from own records that there may be potential for non-designated</p>	<p>Policy DES05 includes a requirement in criterion d) which looks to address the</p>

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<p>archaeological remains to be preserved in this area. We therefore advise that you should be guided by the detailed advice of the County Archaeological Advisor.</p>	<p>possible presence of archaeological features by requiring an assessment to determine the extent and scale of these. Mitigation measures would then be expected to put in place if required. The Council would be guided by the advice of NCC Archaeology.</p>
<p>443. Chapter 10 Desborough Berrys has been instructed by Rigid Group Ltd (RGL) to provide comments in relation to the Site Specific Part 2 Local Plan (SSP2) and the Potential Employment Allocation Site D1 identified in Paragraph 5.8 and Picture 10.2 of the document (referred as to Site D1 from here on in). This allocation is subject to further work through the Council's Property Market Review and Assessment of Employment Sites. This document will seek to establish the Borough's employment land needs and associated employment land allocations.</p> <p>These representations SUPPORT the proposed allocation and will seek to demonstrate that there is a genuine local requirement for additional employment land in Desborough and that the site is available, suitable and deliverable in accordance with the requirements of Planning Practice Guidance tests.</p> <p>THE SITE & SURROUNDINGS</p> <p>Site D1 is situated to on the northern fringe of Desborough and immediately adjacent to the western boundary of RGL on Stoke Road, Desborough. It is regular in shape and is located between Harborough Road (8576) to its west and the existing RGL and Paves Packaging plant to its south and southeast. Whilst land to its north and northwest are predominately in agricultural use, there is further development in close proximity to the site along Harborough Road which includes various industrial units, a hotel and a restaurant.</p> <p>The site measures 8.1 hectares and comprises a parcel of undeveloped land currently in</p>	<p>Noted. The Employment Land Review will inform decisions with regards to the extent and location of any employment allocations in the Pre-Submission Plan.</p> <p>The responses to this consultation will be considered and will inform the proposal included within the pre-submission version of the Plan alongside the findings of the site assessments and the Employment Land Review.</p>

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agricultural use (Grade 3). In planning policy terms, the site lies on the edge of the defined settlement limits for Desborough and in the open countryside.

An existing track provides access onto Harborough Road (8576) which in turn provides excellent links to Desborough town centre and the A6 via the wider highways network. The site lies within Flood Zone 1 and is therefore in an area with the lowest risk of flooding.

POLICY CONTEXT

National Planning Policy Framework

The overarching emphasis of national planning and economic policy set out in the NPPF and PPG is to support long term growth, sustainability and prosperity through new economic development, the expansion of existing businesses and new inward investment.

This is reinforced by Para 8 which identifies three dimensions to sustainable development: economic, social and environmental. It identifies the economic role as being *"to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure"*.

Paragraph 11, 1st bullet point, describes what the presumption in favour of sustainable development means. For plan-making, it establishes a positive approach: *"plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change"*.

Further clarification is provided in the 'Building a strong, competitive economy' set out at Paragraph 80 of the NPPF which states:

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"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development".

The main economic development and business requirements of the NPPF are broadly summarised as follows:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;
- be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances; and
- recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Planning Practice Guidance

The Housing and Economic Development Needs Assessments PPG guides councils in how to assess their housing and economic development needs. In considering matters relating to economic development, the following matters are relevant:

- Plan makers are required to liaise closely with the business community to understand

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their current and potential future requirements.

- The use of market intelligence (from local data and discussions with developers and property ...) is encouraged.
- market intelligence and market ...;
- to recognise that the location and premises requirements of different types of business will be important

The Housing and Economic Land Availability Assessment seeks to assist in identifying suitable sites for the delivery of housing and employment requirements. It highlights the importance of identifying a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period, thus increasing the prospects of development coming forward.

Joint Core Strategy 2016

Section 4 'Delivering Economic Prosperity' states that the Plan seeks to make North Northamptonshire more self-reliant by achieving a sustainable balance between local jobs and workers and a more prosperous and diverse economy. It intends on doing this by:

1. *"Planning for enough jobs to match the forecast growth in labour force. A target for 31,100 net additional jobs alongside the strategic opportunity for 40,000 new homes over the period 2011-31 is identified;*
2. *Ensuring that the right amount and type of employment land is available*
"

Paragraph 8.7 the JCS acknowledges that a *"major constraint to economic growth is the lack of available sites to support the expansion of existing businesses. The provision of smaller parcels of land within larger, strategic sites can help to support the expansion of existing businesses, and their retention in North Northamptonshire."*

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Para 8.18 deals with the logistics industry and recognises the importance that the industry has for the area given the excellent central location and excellent strategic road connections. Technical studies and market analysis have identified that this sector remains strong and that failure to meet this demand in North Northamptonshire through the provision of suitable sites will lead to activity being displaced away from the area and opportunities to capture investment, unlock other uses and the potential for high quality investment will be lost.

Policy 24 deals with proposals for logistics and states that large scale strategic distribution will be supported where development complies with the spatial strategy, facilitate the delivery of a mix of jobs and at a level of the highest viable standards of design and sustainability.

ASSESSMENT

As detailed above, when considering strategic employment land allocations, both the NPPF and NPPG advocate the following approach:

- Economic development needs - identifying future quantity of land or floorspace required for economic development uses including both the quantitative need for new development and providing a breakdown of that analysis in terms of quality and location, indicating gaps in current land supply; and
- Employment land availability - identifying a future supply of land which is suitable, available, and achievable for economic development uses over the plan period

We address each in turn below.

Economic development needs

The NPPF states that Local Planning Authorities are required to positively seek opportunities to meet the development needs of their area and in doing so they are required to liaise

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closely with the business community to understand their current and potential future requirements.

Whilst we understand that this is presently being investigated through the 'Property Market Review and Assessment of Employment Sites', there is genuine 'business need' by RGL for development on Site D1. This is summarised below.

RGL was founded in 1896 in Desborough and is the UK's longest continuously running corrugated cardboard manufacturing business. It is part of the VPK Packaging Group, is a leader in manufacturing premium secondary packaging and is one of the fastest growing independent European manufacturers of recycled paper and corrugated cases. RGL is one of the largest employers in Desborough and presently employs approximately 300 people, many of who are from the local area.

RGL have an urgent requirement to extend their existing site to include a storage and distribution warehouse. This requirement principally stems from a business and operational need to address a number of issues with the existing logistics operations.

Presently, there is insufficient onsite storage space to accommodate the necessary raw materials required for the production process and the finished product (cardboard packaging). As a result, the bulk of the raw materials required for the production process are presently stored elsewhere in other distribution warehouses in the region. To meet operational needs, raw materials are delivered to the site on a very frequent basis. The same equally applies to the storage of the finished cardboard products which can only be stored on site in limited quantities and for a limited period of time, before being transferred to other regional distribution warehouses.

These issues combined not only result in significant logistical costs (transportation costs associated with moving materials/ goods to and from the site and their subsequent storage), but also impede RGL's ability to meet their current output needs. As a result, the existing

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plant is unable to increase output and this is unsustainable for the business.

To address this issue, RGL has an urgent requirement for a circa 10,0000 m2 storage and distribution warehouse either on or adjoining their existing premises. Whilst the requirement can be accommodated in a separate building, the locational imperatives dictate that it needs to be located immediately next to the existing RGL plant. The existing RGL plant does not have any suitable areas which could accommodate the proposed warehouse and it would be unfeasible to redevelop the existing site due to the need to remain operational during construction works.

The proposed warehouse will be fully automated and linked to the main RCG plant by an automated track. This will allow automated picking / storing of raw materials and finished products in line with modern practices.

As a direct result, the existing premises are considered to unsustainable for RGL. On the basis that there are no alternative sites within Desborough which meet their needs, RGL could be forced to relocate to an alternative premises outside of the Borough. Being a genuine local firm, RGL are keen to avoid this scenario.

Having regard to the above, it is clear that there is an urgent need for RGL to expand their premises and address the inefficiencies with their existing operations. The proposed allocation is clearly consistent with both the NPPF and the NNJCS which requires LPAs to recognise the importance that economic development has to achieving 'sustainable development' and allocate suitable sites to meet the needs of existing businesses.

Employment land availability

To consider the above matter, 'Housing and Economic Land Availability Assessments' are required to identifying suitable sites for the delivery of employment requirements and highlights the importance of identifying a future supply of land that is suitable, available and

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achievable.

(Table 1.1 and Site Assessment table are included within the attachment to this comment)

Having regard to the assessment above, it is clear that there are no sever site constraints that would impede development. On this basis, the site is considered to be suitable for development.

Availability and Achievability

The NPPG states that for assessing viability, there should be reasonable confidence that, on the best information available, there are no legal or ownership problems with a particular site. This often means the land is controlled by a single developer or the land owner is willing to sell. Assessing achievability is judging whether there is a reasonable prospect that a development will occur. It involves making judgements on the economic viability of a site.

Due to the business needs and the sites proximity to the existing Rigid site, Site D1 has an RGL 'in principle' board approval giving the green light to secure the site for future expansion. Discussions between RGL representatives and the landowner are progressing.

A pre-application enquiry is also being prepared to establish the principle of development and this provides further evidence that there is a strong appetite to bring Site D1 forward for development by all interested parties.

CONCLUSION

Having regard to the the NPPF and NNJCS, we are of the opinion that the draft allocation of D1 Site for employment use would meet the tests of sustainable development as defined by the NPPF and the NNJCS.

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<p>In summary, the proposed allocation would:</p> <ul style="list-style-type: none"> • respond positively to a specific local need from RGL, recognising the importance role that economic development has in achieving sustainable development; • comply with the NPPF / PPG requirements in that the site is sustainable, available and achievable; • support the long term retention of up to 300 jobs in Desborough; • be well located to existing employment uses demonstrating compatibility; and • have only a very limited impact on the surrounding natural <p>On this basis, the allocation of Site D1 is considered to be acceptable and therefore appropriate for allocation in the Site Specifics Local Plan Part 2.</p>	
<p>444. Policy DES04 Land off Buxton Drive and Eyam Close</p> <p>This representation has been prepared by Landmark Planning Ltd on behalf of Central England Co--op Ltd & HBH Developments Ltd in relation to the land off Buxton Drive, Desborough.</p> <p>The representation supports the proposed allocation of 135 houses on this site (DE/212) and the policies related to it (DES04 a, b, c, d, e, & g) within the Local Plan.</p> <p>To confirm alignment with the above polices, the following documents are attached:</p> <ul style="list-style-type: none"> • Archaeological Desk--Based Assessment • Geo--Environmental Assessment • Design and Access Statement • Illustrative Masterplan-- Nineteen47, drawing ref MI1097--004 • Site Areas Plan – Nineteen47, drawing ref M1097--005 	<p>Noted. The site has been included in the Part 2 Plan as a proposed allocation following a site assessment process.</p> <p>The responses to this consultation will be considered and will inform the proposal included within the pre-submission version of the Plan with respects of housing allocations for Desborough.</p> <p>The benefits of the scheme have been recognised and form part of the decision to propose this site as an allocation for housing.</p>

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The planning application was submitted on 4th January 2018, and is expected to be determined in September 2018.

DES04-a

In order to determine the extent and scale of any potential archaeological features, Landmark Planning commissioned Allen Archaeology to prepare an Archaeological Desk Based Assessment.

Findings from this report demonstrate evidence of Pre--Historic, Roman, Medieval, Post--Medieval and Modern activity within the study area. However, with regard to the significance of possible archaeological findings, all eras are considered to have negligible/low potential, save for the Medieval period, which is considered to have the potential to encounter *'features of local significance at best.'*

Northamptonshire County Council's response to this report recommended a geophysical survey and trial trenching prior to the submission of any reserved matters, *'to ensure that features of archaeological interest are properly examined and recorded'*.

DES04-b

The Geo--Environmental Assessment carried out by BWB consulting, concludes that *'the site is considered to pose a low risk to human health'* and is satisfactory for residential development.

DES04-c

The attached masterplan indicates that the proposed road layout creates a 'loop' for traffic via the access points off Buxton Drive and Eyam Close.

Residential development on the site is supported subject to the development principles in Policy DES04 being met.

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Page 31 of the Design and Access Statement, demonstrates that the intention of this loop is to '*aid the circulation and distribution of traffic*', in line with the requirements of the policy.

DES04-d

The Design and Access Statement assesses the current character of Desborough and aims to apply this to the design of the new site, stating that '*The masterplan creates a framework for a scheme with a sense of place*', whilst accepting that the specific elements of the site's character '*will also be determined by the future architectural details of any proposal which is a reserved/detailed matter.*'

DES04-e

As outlined in the Illustrative Masterplan MI1097--004, the site is well related to adjacent developments. The looped access roads on Eyam Lane and Buxton Drive, as well as two pedestrian links on both the far eastern and western sides of the site, substantially help the achievement of connectivity with the surrounding area.

The western footpath leads into the open countryside via Green Lane. This, along with the orientation of the development, and the green space which runs from near the northern--most access point, to the southern boundary with the open countryside, demonstrates the outward looking nature of the site.

DES04-f

Green space runs centrally through the site, serving as an ecological corridor to mitigate negative biological impacts of development.

To further enhance biodiversity, various additional '*informal*' green spaces have been

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<p>highlighted in Site Areas Plan MI1097--005.</p> <p>DES04-g</p> <p>The addition of a play area in the new site as show on the Illustrative Masterplan will serve as an additional amenity to existing residential developments, particularly near to Elton Close and Eyam Close.</p> <p>In relation to existing amenities, the Site Specific Local Plan Draft, 10.8 highlights that in Desborough the '<i>provision in the number of Butchers, Chemists/Opticians, Florists, Hairdressers/Beauticians, Travel Agents, Building Societies, Employment/Post Office/Information uses remain above the national average</i>'. The proposed development would help protect the economic vitality of these facilities, to benefit both existing and new residents.</p> <p>This proposal is subject to a planning application complying with policy DES04 of the Local Plan in all respects. Early approval will mean that the development can effectively contribute to the housing supply of Kettering Borough.</p> <p>This is particularly the case as the site has already raised substantial developer interest, being a logical extension to a popular settlement. For this reason the promoters of the site have submitted an early planning application and are anxious to secure approval. This will help with the deliverability of the Plan with all of the homes expected to be delivered within the next five years.</p>	
<p>463. Chapter 10 Desborough</p> <p>I wish to comment that as one of the land owners of Land parcel D7 at Desborough, we have been actively promoting the site and much of the work to allow it to be developed has been undertaken, Ecological, highways, drainage etc.</p>	<p>Noted.</p>

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<p>498. Chapter 10 Desborough</p> <p>RDC Development Consultants (RDC) welcome the opportunity to submit comments to the Kettering Borough Site Specific Part 2 Local Plan — Draft Plan Consultation. RDC are promoting land for development to the south of Harrington Road, Desborough for residential development and consider that the site is suitable to accommodate up to 61 dwellings that could be delivered in the first five-year period of the plan, making a valuable contribution to the supply of deliverable housing sites in the Borough and adding to the choice in the supply of new market and affordable housing. An outline planning application KET/2018/0479 has recently been submitted for the site, which is supported by a suite of technical reports and confirms that there are no technical or physical reasons that would prevent the development of the site for housing. Our comments as set out below should be read with this objective in mind.</p> <p>The strategic context within which the Part 2 Local Plan is being prepared has been set following the adoption of the North Northamptonshire Joint Core Strategy (JCS) in 2016. In preparing the Part 2 Plan, we note that this is not the correct forum to look to revisit strategic matters such as housing numbers or the quantum of employment land required over the Plan Period. Notwithstanding the above, the Part 2 Plan must be prepared in such a way that will enable the growth objectives of the JCS to be delivered and for sufficient land for housing and employment to be allocated in order to achieve this.</p> <p>In setting the context for the delivery of new development over the Plan Period, Policy 11 of the JCS identifies the spatial development strategy for the JCS authorities. The spatial strategy seeks to focus new housing and employment development in the Growth Towns. After the Growth Towns, the Market Towns are intended to provide a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town. Desborough is identified as a Market Town and, therefore, is</p>	<p>This site has been previously discounted after a site assessment which is summarised in the Housing Allocations Background Paper (May 2018). Those sites which have been identified as housing allocations in the SSP2 are sufficient to fulfil the residual housing requirement for Desborough. This includes a 10% buffer which has been added to the housing requirement.</p> <p>The pre-submission plan will be accompanied by a background paper setting out additional information on the Council’s housing trajectory and five year land supply position. The SSP2 will allocate sufficient sites to meet housing requirements identified in the JCS in accordance with the spatial strategy set out in the JCS.</p>

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considered suitable to accommodate a proportionate amount of housing growth where this will support regeneration and local services. Policy 11 also confirms that the need for any additional growth in housing will be tested through the Part 2 Plan and states that where sufficient housing is not coming forward to deliver a five-year supply of housing, then additional sites should be identified, first in the Growth Towns and then the Market Towns.

Policy 28 of the JCS goes on to identify the overall housing requirement of the JCS area and breaks this down for the individual authorities and the different tiers of settlement in the spatial strategy. Kettering has an overall housing requirement of 10,400 dwellings, which means a requirement of 1,360 dwellings to be delivered in Desborough.

Policy 28 is clear that there is a requirement to identify specific housing allocations in Desborough, whilst Policy 11 provides sufficient flexibility to allow the Council to identify and allocate additional sites if the Council are unable to demonstrate a five-year supply of housing, and that the preferred locations for these new sites should be either in the Growth Towns or the Market Towns.

Desborough, as a Market Town, has been allocated a Sustainable Urban Extension (SUE) called Desborough North, which is expected to deliver in the region of 700 dwellings. Annex A of the JCS (which was adopted in 2016) identifies the Desborough North site as delivering 50 dwellings in 2016/17. The Council's latest Annual Monitoring Report for the period up to 31st March 2017 confirms that there were no completions from the SUE in the year 2016/17 and that the first completions were not now expected until 2018/19 at the earliest and even then, only 25 dwellings were anticipated to be constructed, lower than the 50 predicted in the adopted housing trajectory in the JCS.

The latest AMR provides strong evidence that the rate of delivery of housing on the Desborough SUE is significantly below what the Council had originally thought it would be. Notwithstanding that the site is understood to have outline permission, the rate of delivery is such that it is undermining the provision of new housing in Desborough. The lack of delivery

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of an allocated site leads us to question why the Council are looking to rely so heavily on a single site to meet a significant proportion of housing for the town. In our view, the Council should look to allocate a range of different sites within Desborough. Whilst the draft Part 2 Plan does include 2 draft housing allocations, we consider that the land at Harrington Road would also be suitable for allocation and could help to meet the housing needs of the town.

The latest AMR for 2016/17 also presents revised assumptions in relation to the rate of completions on other SUEs that are allocated in the JCS. The fact that some of these are still not now expected to start delivering until 2018/19 when originally, they were envisaged to start contributing completions in 2016/17 leads us to conclude that some of the other SUEs also have delivery issues associated with them. Whilst the Council have not published an up to date five-year land position paper, it is our view that there is a question mark over whether the Council are able to demonstrate a five-year supply of housing at present, and if not, it would certainly struggle in the next year or two if the allocated SUEs do not come fully on stream.

It is our view, that if sufficient sites are not coming through and delivering housing to meet the Council's needs and contributing to the five-year supply of housing, then the Council should be allocating additional sites to address any shortfall. JCS Policy 11 provides policy support for this eventuality and as such we contend that the Council should be looking to identify additional housing sites in Desborough.

The recently published revised National Planning Policy Framework (NPPF) provides updated policy advice to local planning authorities on what the term 'deliverable' means in the context of housing land supply, and states that:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be

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considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

In respect of the Desborough North SUE, the fact that it has outline planning permission and has yet to deliver any dwellings brings into question whether it is truly deliverable in the context of the revised definition as set out in the NPPF. If the Desborough North SUE is not deliverable, then we contend that the Council should allocated an additional site or sites in Desborough to make up any shortfall in the short term.

In light of the case set out above for the need for an additional housing allocation or allocations in Desborough, we object to the omission of the land to the south of Harrington Road from the Draft Plan. The Council have previously considered the suitability of the Harrington Road site as a potential housing allocation in the Housing Allocations Background Paper (May 2018). The site, identified as DE/067 Land adjoining the Orchard, Harrington Road was described as extending to 2.5 hectares in size and having an indicative capacity of 75 dwellings. The Council’s assessment and conclusions stated that:

“No significant constraints have arisen as a result of the assessment. However, it was previously indicated that widening of Harrington Road would be required. Further information has been submitted to attempt to address this issue where it has been demonstrated that access off Harrington can be achieved.”

The Council conclude that there are no significant constraints associated with the site. A view that we concur with having recently submitted an outline planning application for the site, which confirmed that there are no technical or physical reasons that would prevent the

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delivery of the site.

The comment in relation to the need to widen Harrington Road in order to serve the development has been fully explored and an Access Strategy report has been prepared to demonstrate that the existing geometry and alignment of the road would be capable of serving a residential development of up to 77 dwellings. The Access Strategy Report assesses the existing conditions on Harrington Road and details the findings of a number of studies that have been conducted to ascertain the suitability of the proposed access to serve the development, including swept path analysis, calculation of daily traffic flows and a parking beat survey. A Road Safety Audit has also been undertaken.

Swept path analysis shows that the existing 4.8m carriageway width of Harrington Road is sufficient for a refuse vehicle to pass a car travelling in the opposite direction, and for a refuse vehicle required to manoeuvre around a parked car.

The parking beat survey suggests that parked vehicles have a minimal impact on the flow of traffic along Harrington Road within the vicinity of the proposed development site.

The Road Safety Audit has identified 5 potential problems at the proposed development's access, which will be addressed at detailed design stage. Seven safety issues have also been identified for the section of Harrington Road between the proposed development access and the existing junction with Meissen Avenue, albeit that a clear response to each of these is identified in the Report, and do not therefore, pose a constraint to development.

The Report concludes that the existing layout of Harrington Road provides a suitable access road for the proposed development. A copy of the Access Strategy report is attached for your consideration. We conclude that Harrington Road is capable of serving a proposed residential development of up to 77 dwellings and that a safe access to the site can be created without detriment to other road users.

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Summary and Conclusion

Our comments to the Draft Part 2 Plan are predicated on our objective of securing the allocation of land to the south of Harrington Road, Desborough for residential development. The need to allocate an additional site or sites in Desborough has arisen, in our view due to the lack of progress and delivery of housing arising from the Desborough North SUE. The JCS when adopted predicted that the Desborough North SUE would be delivering 100 dwellings a year in 2017/18. The latest AMR confirms that it will not now start delivering units until 2018/19 and then only 25 dwellings in the first year, rising to a 100 per year in 2019/20. The Council's own evidence clearly demonstrates that there is an issue with deliverability on the site.

In light of the fact that the Desborough North SUE is not delivering housing as anticipated, the JCS made provision for this eventuality within Policy 11, stating that should the Council not be able to demonstrate an adequate supply of housing, then the Part 2 Plan would be able to make additional allocations in order to address any shortfall. We contend that the question marks over the ability of the SUE to deliver housing in the short term, and the potential impact that this will have on the Council's five-year land supply position, create the right conditions for the Council to consider allocating additional sites in Desborough in order to ensure a continuous supply of housing in the town.

Furthermore, the allocation of a number of smaller sites within the town has the added benefit of creating competition in the market for new homes and offers perspective purchasers a real choice of where they live within the town. Smaller sites are less infrastructure intensive, thereby reducing potential lead in times to making a start on site and ultimately reducing the length of time for houses to be constructed and sold, thereby helping with the supply of housing and ensuring the Council can demonstrate a five-year supply of housing going forward.

The Council's own assessment of the site concluded that there were no constraints that

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<p>would prevent the development of the site; a conclusion that we concur with in light of work undertaken to support an outline planning application at the site. Further work has been undertaken to address comments made in relation to the adequacy of the Harrington Road to serve new residential development, which concludes that the road is perfectly adequate to serve a development of up to 61 dwellings.</p> <p>We, therefore, conclude that there are no technical or physical reasons that would prevent the development of the site. We also confirm that the site is available and that there is a willing landowner that wishes to see the site developed. The site is therefore deliverable in the context of the updated guidance in the NPPF, and we therefore commend the site to you for consideration as a draft housing allocation the Pre-Submission Draft of the Part 2 Plan.</p>	
<p>512. Chapter 10 Desborough It is considered that the options for meeting the minimum housing requirement in Desborough are ambiguous and there is an unreasonable approach to allocating sites for housing in Desborough.</p> <p>Paragraph 016 (Reference ID: 12-016-20140306) of the ‘Local Plans’ section in the Planning Practice Guidance outlines that “Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives.” (our emphasis)</p> <p>No Sustainability Appraisal supports this consultation document and therefore the Council is unable to demonstrate that the Local Plan reflects sustainability objectives and has considered reasonable alternatives. In this respect, the Council are unable to demonstrate that the Local Plan is positively prepared, justified or consistent with national policy as it is not informed by a sustainability appraisal and therefore does not demonstrate how the plan has addressed relevant economic, social and environmental objectives. The Draft Local Plan</p>	<p>The sites have been assessed using sustainability appraisal criteria which have been used to consider the alternative sites. The pre-submission plan will be accompanied by a sustainability appraisal report.</p> <p>This site has been previously discounted after a site assessment which is summarised in the Housing Allocations Background Paper (May 2018). Those sites which have been identified in the draft SSP2 are sufficient to fulfil the residual housing requirement for Desborough.</p> <p>The pre-submission plan will be accompanied by a background paper setting out additional information on the</p>

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is therefore not sound in its current state.

Although reasonable alternatives for housing allocations have been considered as part of the Housing Allocations Background Paper (May 2018), there is no sufficient justification to why the Harborough Road, Desborough site has been discounted as a housing allocation.

The report to the Planning Policy Committee on 27th March 2018 identifies at paragraph 3.22 that the site assessments have indicated that the Harborough Road site scores the same as the Buxton Drive site (ref: 212) and land south of Desborough site (ref: DE/210) stating “In comparison with the other sites under consideration this site scores the same as site DE/212 and DE/210 with the remaining sites scoring better than this site, in relation to distance to facilities on the whole. Also when distances to individual facilities such as schools, shops and health centres are taken into the account this site does not fair positively in comparison to the other sites. This is due to the site’s location, outside of the northernmost part of the settlement boundary on Harborough Road.”

This is factually incorrect. The Housing Allocations Background Paper (May 2018) evaluates six potential housing sites within Desborough against the criteria developed by Roger Tym and Partners for East Northamptonshire Council and links the assessment criteria with relevant Sustainability Appraisal objectives.

The Buxton Drive site (ref: 212), land south of Desborough site (ref: DE/210), and the Harborough Road site (ref: DE2/13) all score the same in relation to distances to facilities, and in fact the Harborough Road site scores the most positive scores against the overall Sustainability Appraisal objectives and is therefore considered more sustainable than the other sites. Paragraph 8 of the Framework makes it clear that

“Achieving sustainable development means that the planning system has three overarching

Council’s housing trajectory and five year land supply position. The SSP2 will allocate sufficient sites to meet housing requirements identified in the JCS in accordance with the spatial strategy set out in the JCS.

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objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)...” (our emphasis)

The conclusion of the site assessment for Harborough Road identifies that the site has no significant constraints to delivery and so there is no justification to the site being discounted when looking at the sustainability of the site as a whole. In this respect, the Council’s decision to not allocate the site is not consistent to the approach to achieving sustainable development and therefore is not consistent with the Framework.

Further technical work has been undertaken to support the suitability of the Harborough Road site, including: -

Noise Assessment by BSP Consulting;

- Transport Appraisal by ADC Infrastructure;
- Ecological Assessment by Avian Ecology; and
- Heritage Note by Pegasus Group.

These reports are submitted with this statement and show that the effects associated with housing development at Harborough Road can effectively be mitigated. In particular, the transport appraisal identifies that facilities within Desborough Town Centre are within walking and cycling distance from the site.

A sustainability assessment proforma is attached at Appendix 2, which has been updated to reflect the further work that has been undertaken. The updated sustainability assessment shows the site scores more positively against the sustainability criteria and therefore should be allocated for housing.

The report to the Planning Policy Committee on 27th March 2018 also outlines at paragraph 3.23 (in relation to the Harborough Road site) that “The allocation of this site would result in a significant over provision of housing in Desborough of approximately 134 dwellings.”,

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which suggests that the Council have only discounted the site due to the number of dwellings proposed. This is not in the spirit of the Framework which seeks to significantly boost housing supply and therefore the Local Plan would not be consistent with national policy or positively prepared to provide a strategy which, as a minimum, seeks to meet the area's objectively assessed need. The Council are applying a 10% buffer (136 dwellings) to the total minimum housing requirement (1,360 dwellings) apportioned to Desborough during the plan period (2011-2031). It is considered that this buffer is not sufficient to sustain Desborough's role as a Market Town (to provide a strong service role for the local community and surrounding area) and address the need for housing in the local area.

It is evident that the delivery of the Desborough North SUE has significantly stalled as the housing trajectory in Appendix 4 of the Joint North Northamptonshire Core Strategy shows that 250 dwellings of the total 700 dwellings should have been delivered between 2016/2017 and 2018/2019. It is highly unlikely that any dwellings will come forward during 2018/2019 as no applications for Reserved Matters approval for residential development on the site have been submitted to the Council. There is also no evidence that a house builder is interested in the site. In this respect, the Council should therefore proactively bring sites forward and make further housing provision within the Site Specific Part 2 Local Plan in line with Policies 11, 28 and 29 of the North Northamptonshire Joint Core Strategy (2016) to ensure it delivers sufficient housing supply within Desborough and to ensure the Borough maintains a deliverable 5 year supply of housing land. The site at Harborough Road should therefore be allocated for housing. It does not have any significant constraints and therefore can come forward quickly to address any issues with delivery of the Desborough North SUE and maintain the supply of deliverable housing sites.

Details of this site and proposals are identified in the accompanying 'vision' document, which in summary provide for:

Up to 230 dwellings, to include 30% affordable homes in line with emerging Policy 30 of the North Northamptonshire Joint Core Strategy;

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<ul style="list-style-type: none"> • Housing mix to include family homes, and starter homes; • Green Infrastructure along the southern boundary to connect to the wider network; • Open space to include children’s play area; and • Housing set back from site boundaries to ensure existing hedges are retained within a landscaped buffer. <p>In light of the above, the proposed housing strategy in the Market Towns, in particular Desborough, is not justified as it does not put forward the most appropriate strategy in relation to the considered reasonable alternatives.</p> <p>It is therefore advised that the Council put forward the Harborough Road site as a proposed housing allocation. This will ensure the Council positively and proactively seeks to meet the development needs of the area in line with the Framework.</p>	
<p>513. Chapter 10 Desborough</p> <p>Although the Desborough Neighbourhood Plan is referred to at paragraph 10.4 of the Site Specific Part 2 Local Plan Document, there is no reference made to the relationship that the adopted Part 2 Local Plan will have with the Desborough Neighbourhood Plan.</p> <p>Policy 11 of the North Northamptonshire Joint Core Strategy outlines that any proposals for significant additional growth should be tested and supported through Part 2 Local Plans or Neighbourhood Plans. In this respect, the Council needs to consider providing scope for proposed allocations in the Neighbourhood Plan to come forward if the Neighbourhood Plan makes further progress. This will ensure the Local plan accords with paragraph 29 of the Framework by giving communities the power to develop a shared vision for their area and to ensure the Neighbourhood Plan accords with the strategic policies in the Local Plan as required by paragraph 29 of the Framework.</p>	<p>The Neighbourhood Plan is yet to reach a stage where there is sufficient confidence that the Plan will be adopted and therefore policies within the Desborough chapter of the Plan will remain. The latest version of the Neighbourhood Plan was published in October 2017. It is understood that no significant further work on the Plan has been undertaken since this date.</p>
<p>520. Chapter 10 Desborough</p> <p>In Desborough there are two larger sites; DE/212 for 135 dwellings and DE/210 for 304 dwellings. Housing growth in Rothwell is allocated to one specific site; RO/088a which has</p>	<p>It is acknowledged that the allocations at Desborough and Rothwell when combined will have a cumulative impact</p>

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<p>an allocation of 300 dwellings. Growth in these two locations will also have a cumulative impact on the A14, specifically at A14 junctions 3 and 4, given the close proximity of these sites to these junctions.</p>	<p>on the A14 and therefore a TA would be expected to be required as part of application for these sites. However, the impact of the road network was considered in the site assessment process where additional work was undertaken to inform decisions for housing allocations in Desborough.</p> <p>This work was used to assist in identifying sites with the least impact on the road network.</p>
<p>548. Chapter 10 Desborough</p> <p>The County Council notes the significant level of new housing to be delivered during the draft SSP2 period to 2031 in Desborough and Rothwell, and the additional sites proposed for inclusion in the Housing Allocations for the town.</p> <p>Current capacity across Desborough and Rothwell for Primary school places is extremely limited. This is demonstrated by the inclusion of a requirement for a new 2FE Primary School to be delivered as part of the Desborough North SUE, and a further 2FE Primary school to be delivered as part of the Rothwell North SUE.</p> <p>Additional housing development coming forward during the plan period impacting on capacity further will therefore be expected to contribute towards delivery of this and additional infrastructure, as may be required, in order to effectively mitigate the impact of the development on existing and planned provision.</p> <p>In terms of Secondary school places, capacity at Montsaye Academy (Rothwell) is expected</p>	<p>It is acknowledged that the future growth of Desborough is likely to require additional capacity for both Primary and Secondary education. It is expected that as requested S106 will be used to mitigate the impact of housing on services and facilities such as both primary and secondary schools. The Council will continue to work with NCC Education to ensure adequate provision is made for education.</p>

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<p>to be fully utilised by September 2019 based on three year trend & birth rate data alone. This, in conjunction with the significant capacity issues across remaining Secondary Schools in the Kettering area as previously set out in this response, may require further mitigation measures to be put in place over and above the new and extended Secondary school projects highlighted above.</p> <p>The County Council will continue to monitor the position closely, however it is expected that additional capacity may be required to be created at Montsaye Academy in order to accommodate the additional pupils stemming from housing development in the vicinity, coming forward during the draft SSP2 period. Section 106 contributions will therefore be required from major housing developments in the area to support this requirement.</p>	
<p>559. Chapter 10 Desborough</p> <p>As the Council are aware, Gladman are promoting the land identified as D7 (a potential employment allocation) for residential development and are currently awaiting determination of a planning application for up to 245 dwellings. A full site submission is set out below at Chapter 3, but we would like to remind the Council that we consider the site at Braybrooke Road to be suitable and available for residential development, and in line with our concerns addressed above in respect of housing land supply, we consider that the site at Braybrooke Road could deliver housing across a 6-year period. Paragraph 10.20 and the supporting map identified 2 areas of 'Historically and Visually Important Open Green Space' within Desborough. Having reviewed the 'Historically and Visually Important Open Space Background Paper' published in September 2015, Gladman wish to raise some concerns regarding one of the areas identified for protection. Gladman would like to remind the Council that the designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that for Green Belt land. As such, the Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation. The Framework is explicit in stating at paragraph 99 that 'Local Green Space designation will not be appropriate for most green areas or open space'. With this in mind, it is imperative that the planmakers can clearly</p>	<p>Noted.</p> <p>Part of this site has previously been discounted as a potential housing allocation (site DE/013a). At this stage sufficient sites have been identified in the town to meet housing requirements.</p> <p>The pre-submission plan will be accompanied by a background paper setting out additional information on the Council's housing trajectory and five year land supply position. The SSP2 will allocate sufficient sites to meet housing requirements identified in the JCS in accordance with the spatial strategy set out in the JCS.</p> <p>The areas identified as Local Green Space have been identified following a</p>

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<p>demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green area concerned is local in character and is not an extensive tract of land. <p>We are concerned that HVI/069 is not local in character or demonstrably special, and given the scale of the settlement, we considered the area to represent an extensive tract of land. Further to this, we note that in the September 2015 assessment that supports this proposed LGS, sites of a similar size and location adjacent to ‘modern development’ were discounted. Gladman are also lead to understand that the land in question is in private ownership, and given the lack of Public Rights of Way crossing the site, do not consider that the site has any specific recreational value to the local community. Site Specific Part 2 Local Plan – Draft Plan Consultation Gladman Developments Ltd. Gladman suggest that the Council revisit the evidence base underpinning this proposed allocation and ensure that consistency in the site assessments can be fully demonstrated, and the evidence if sufficiently robust so as to support such a significant designation.</p>	<p>robust assessment. Site HVI/069 is located adjacent to existing development and is therefore in close proximity to the community it serves. The historic significance of the ridge and furrow in an area where much of this landscape feature has been lost makes it a demonstrably special space to the local community. It is not an extensive tract of land and is local in character The proposed HVI therefore meets the requirements of the NPPF.</p>
<p>560. Chapter 10 Desborough</p> <p>The Council are aware of Gladman’s land interest in the plan area, at land off Braybrooke Road, Desborough. A site location plan can be found at Appendix 1.</p> <p>An outline application (reference KET/2018/0060) for the erection of up to 245 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Braybrooke Road, was submitted in January 2018. The above application is awaiting determination by Kettering Borough Council.</p> <p>The 13.57ha application site comprises a single field in agricultural use. It is well related to the settlement and it is contained by physical features at its urban edge. The development</p>	<p>Noted. Part of this site has previously been discounted as a potential housing allocation (site DE/013a). At this stage sufficient sites have been identified in the town to meet housing requirements.</p> <p>The pre-submission plan will be accompanied by a background paper setting out additional information on the Council’s housing trajectory and five year land supply position. The SSP2 will</p>

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<p>would represent a logical extension to Desborough. The site is well contained within the landscape and important trees and other landscape features are retained and the local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impacts.</p> <p>Within the draft Site Specific Part 2 Local Plan, the site is identified as a potential employment allocation. We however consider the site to be a sustainable and viable location for residential growth and believe that up to 245 dwellings could be delivered over a 6-year period. Gladman therefore request that the Council consider the site as a suitable location for residential development.</p> <p>The delivery of the proposed development at land off Braybrook Road, Desborough will bring benefits to the local community, including:</p> <ul style="list-style-type: none"> • The delivery of market and affordable housing in a sustainable location to meet housing needs; • The provision of new public open space that is not currently available and a high quality landscape setting, along with more informal recreation space and landscaping to meet the needs of existing and future residents; • The creation of a high quality residential development which respects the character of the surrounding area. <p>The delivery of this scheme will result in significant benefits for the local community and surrounding area including the provision of New Homes Bonus payments, increasing the economic activity of the area and will contribute towards a number of aspirations that are currently being targeted by the Site Specific Part 2 Local Plan.</p>	<p>allocate sufficient sites to meet housing requirements identified in the JCS in accordance with the spatial strategy set out in the JCS.</p>
<p>561. Chapter 10 Desborough Harris Lamb Planning Consultancy has been instructed by Tata Steel (UK) Limited (“Tata”) to prepare this representation to the draft plan consultation. Tata own a site to the north east of Desborough, which is known as ‘Land off Pipewell Road, Desborough’ and has been split</p>	<p>These sites (DE/063) and (DE/064) was discounted in due to unresolved issues regarding the capacity of the one way railway bridge in close proximity to the</p>

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in the Council's assessment into two sites – DE/063 and DE/064. As a whole the site straddles the existing settlement boundary, with DE/063 in the settlement boundary and DE/064 outside the settlement boundary. We strongly object to the proposed removal of DE/063 from the settlement boundary and consider the only reason for this would be to prevent a sustainable development being delivered, which is contrary to the National Planning Policy Framework (“the Framework”). In terms of the whole site, this is subject to an outline application, which is at the advanced stage of negotiations. We consider the site is deliverable and that the site should be included in the plan as either an allocation to assist with delivery in the first five year period or a reserved site to assist with short term delivery in a sustainable location if the ‘25% buffer’ monitoring figure is triggered.

Removal of DE/063 from the settlement boundary

On the 30th May 2018, we wrote to the Council to raise our concerns with the approach promoted in the committee reports that were presented to the Planning Policy Committee on 27 March 2018 and 19 April 2018, with a particular focus on the ‘Assessment of Sites for the Allocation for Housing Land at Desborough and Rothwell’ and the ‘Settlement Boundaries’ papers respectively. This letter is attached to our representation and clearly sets out why the committee report presented to members did not present an accurate reflection of the highway position in relation to this site and raised our objection to sites in the existing settlement boundary being disregarded in favour of sites in the open countryside. We maintain our objection in this regard and consider that this site should be reinstated within the settlement boundary and included as a residential allocation. The only reason not to do this would be to stand in the way of sustainable development, which is contrary to the pro-growth agenda in the Framework.

Assessment of the sites in the Background Paper: Housing Allocation (2018)

We also object to the assessment of sites in the most recent Housing Allocation paper because we consider the assessment does not accurately reflect the planning position in

site and is also being proposed to be taken out of the settlement boundary. Those sites which have been identified as allocations in the SSP2 are sufficient to fulfil the residual housing requirement for Desborough. The principles to define settlement boundaries as set out in the Settlement Boundary Background Paper (April 2018) have been used to exclude this site from the settlement boundary on the basis of principles 1 and 3(d). Principle 1 requires the boundary to be defined tightly around the built up framework and principle 3 excludes large gardens and other open spaces which are usually open and relate to the open countryside rather than the settlement.

The pre-submission plan will be accompanied by a background paper setting out additional information on the Council's housing trajectory and five year land supply position. The SSP2 will allocate sufficient sites to meet housing requirements identified in the JCS in accordance with the spatial strategy set out in the JCS.

The map is a base map produced by Ordnance Survey; the Council is not able

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relation to DE/063. We also consider the assessment is not consistent and that these inconsistencies favour the proposed allocation – DE/212. The reasons for this are set out below and the points raised relate to the assessment of DE/063 unless expressed otherwise:

- The yield from this site should be 70 rather than 91 dwelling.
- Minerals and waste – this should be a ‘double tick’ rather than a ‘double cross’. The site is not in the minerals safeguarding area
- Community – this should be a ‘single tick’ in line with the other sites (including DE/212). DE/063 would also provide POS and green infrastructure.
- Noise – DE/212 is located within close proximity to the A6. We have no reason to believe this would prevent development, but mitigation will be needed to provide an appropriate living environment for future residents. This should be ‘neutral’ rather than ‘double tick’.
- Compatible development – the residential use would be perfectly compatible with the surrounding uses as demonstrated through the submitted outline application for the whole site. This should be a ‘double tick’.
- Ecological features – this should be a ‘double tick’. The proposal would facilitate the retention and enhancement of the tree belt and ravine to the north of where the houses would be developed.
- Capacity of the highway – as identified in the attached letter, significant work has been undertaken to demonstrate that sufficient capacity exists in the surrounding highway. Even in the case of the application for the whole site, which almost triples the number of dwellings to be delivered, the only measures required would be a minor tweak to the operation to the traffic lights over the railway bridge at the south western end of Pipewell Road (this would be

to update this base map. However the Council is fully aware of the location of the solar farm.

The settlement boundary for Desborough will be amended to remove the area of land which is Desborough Green Space

The pre-submission plan will be prepared in accordance with the new NPPF.

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done on the highway authorities computer system and take a matter of minutes), and the addition of a right hand turn lane at one of the junctions in the town (this can be accommodated on highway land). This level of mitigation would be no greater than the other sites being assessed. This should be a 'double tick' to be consistent with DE/212.

- Capacity of infrastructure – there is sufficient capacity in terms of water, sewage, electricity and gas). This should be a 'double tick'.

When the scores are updated accordingly, DE/063 would outscore DE/212.

The assessment undertaken by the Council does not include DE/064. So we have considered the site against the assessment criteria and what is evident is that the addition of DE/064 to the DE/063 would actually secure a number of benefits and actually further increase the number of 'double ticks'. In the case of the score, the addition of DE/064 would improve access to public transport by making provision for a bus route through the site and contributing to the provision of this service. This was agreed in the submitted outline application and would increase the score for Public Transport to a 'double tick'. In terms of benefits, the larger site allows for larger areas of open space and the provision of a play area in a part of the town where there are none.

Map 10.2

The map does not include the solar farm that is located to the north west of the site. It would be a misconception to think that DE/064 adjoined onto to unspoilt agricultural fields.

We would also query the extent of the settlement boundary around Desborough North, which includes a considerable amount of land that was not included in the outline application. This should be reduced accordingly.

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National Planning Policy Framework (NPPF) July 2018

As you will be aware the new NPPF was published during the consultation period. It replaces the 2012 NPPF and, with the Part 2 plan predicted to be submitted in March 2019, the draft version of the plan will need to be reconsidered in accordance with the new NPPF.

The allocation of DE/064

We consider that, in addition to reinstating DE/063 within the settlement boundary, the settlement boundary should also be extended at this point to include DE/064 as a residential allocation. The reasons for this are set out below.

North Northamptonshire Joint Core Strategy (NNJCS)

The backdrop to the Kettering Part 2 Plan is the NNJCS. In terms of housing we acknowledge that this sets minimum housing requirements for the individual towns and the rural area, but these are not caps to development and Policy 11 allows for additional housing numbers to be identified through the Part 2 plans. It is our view that additional sites need to be considered at this time based on the draft document and supporting evidence.

New definition for 'deliverable' site

In Annex 2, the new NPPF sets out an updated definition of 'deliverable' from that in the previous version of the NPPF. The new definition is as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are

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no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”

The main change relates to the inclusion of the requirement for local authorities to provide clear evidence in relation to completions for sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register.

This is relevant to the Part 2 plan because the new Framework, at Paragraph 67, continues to set out a requirement for local authorities to identify and maintain a supply of specifically deliverable sites sufficient to provide a minimum of five years’ worth of housing. It will need to be demonstrated through the Part 2 plan that a supply of specific deliverable sites exists, which is currently set out in the 16/17 AMR. We have reviewed the latest AMR and note there are a number of sites included without full planning permissions, without “*clear evidence*” to show delivery will occur in the 5 year period. For example:

Desborough North is shown to deliver 425 dwellings in the 5 year period, with delivery starting 2018/19 (this year). However, the site has only got outline consent. No reserved matters applications have been submitted. An agreement has not been reached with a housebuilder and there are significant infrastructure requirements. We understand this is undermining interest in the site and, even if a developer does come on board, the delivery of the necessary infrastructure requirement will have significant time implication.

- Rothwell North – another site contributing 425 dwellings in the 5 year period, with delivery starting 2018/19. This site was subject to an outline application, but it does not appear the consent has been issued.

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• Kettering East – We have not been able to identify Reserved Matters approvals for the number of dwellings predicted to come forward in the 5 year period. Furthermore we can find no evidence to suggest that delivery will reach the aspirational target of 280 dwellings per annum in 2020/21, 2021/22 and 2022/23. Sites of this size are particular complicated and there has been a continual pattern on this site, and the other SUEs in the NNJCS, not delivering as expected. We do not dispute that dwellings will be delivered in the next 5 years, but we do not consider clear evidence exists to support the figures currently stated.

We await further details to be provided by the Council in relation to all the relevant sites in the supply and look forward to the opportunity to review this evidence when it becomes available. For example, which developers have an agreement with the landowner, what conditions are outstanding, what RM applications have been submitted and/or approved, what infrastructure requirements are there, when are the infrastructure requirements triggered, what other triggers exist that will need to be address before the numbers predicted can be occupied / implemented, what other approvals are needed, etc. etc.

With a 5 year shortfall, additional sites will need to be identified now in order to secure the necessary delivery levels in the short term.

Kettering East

We do not consider that delivering 280 dwellings year in year on Kettering East for the last 11 years of the plan, with an overall average of 257 dwellings per annum, is a realistic position. Delivery may have commenced, but it is far too simplistic to suggest that all issues are now resolved and a smooth delivery process will follow. The history of SUEs in North Northamptonshire , in terms of the delays that we have been experienced for a variety of reasons, clearly demonstrate the complexity of sites of this size. The complex nature of the SUE sites will inevitably continue to have an influence on the average delivery rate that will be achieved. For example, prolonged negotiations between the landowner and housebuilders for the remaining phases and parcels; numerous reserved matters

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applications need to be submitted and approved; other permissions/approvals will be needed (e.g. s.104, s.278, s.38, building regulations, etc.); it is highly unlikely that the housing market will continue to grow over the remainder of the plan period; certain infrastructure items will need to be delivered at the right point in time; trigger points for contributions will need to be carefully managed; unknown issues becoming apparent (e.g. issue with the title, additional contamination/archaeology, etc. All of these matters have the potential to take longer as expected or be delayed for a variety of reasons. The result being a delay in delivery and reduction in the delivery rates.

Monitoring targets

We acknowledge that the 280 dpa figure is included in the NNJCS; however, the Planning Inspector's report also acknowledges the understandable concerns raised by the development industry about the delivery rates on the SUEs. This resulted in monitoring triggers and measures being added to the plan to address these matters. In this context, we note that the trigger in relation to delivery rates on SUEs is predicted to be triggered by the end of the 2018/19 monitoring year. Again this is further evidence of the uncertainty surrounding the delivery rates being predicted.

With regard to the second trigger, this requires the local authority to identify additional sites when a local authority falls below a 25% buffer in a 5 year supply calculation. In light of the uncertainty that surrounds the delivery on a number of sites in the site both in the short terms and over the plan period, as a minimum, we consider that reserve sites should be identified now in the growth and market towns that could come forward should the aforementioned monitoring target be triggered. We consider it would be prudent to identify these deliverable sites now in order to ensure this is done in a planned manner, rather than in an adhoc manner by appeal.

Our concern with this monitoring target being triggered is support by a recent appeal decisions in Desborough - APP/L2820/W/16/3149835. The Inspectors consideration

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included the most up to date monitoring data for the 16/17 year and the Inspector concluded that a 5.7 year supply existed against a 5% buffer. When a 25% buffer is applied, this would leave the Council without a 5 year supply thereby trigger the requirement for the Council to identify additional sites.

Summary

We consider that the information available does not robustly demonstrate a 5 year housing land supply exists and that uncertainty remains in relation to both the timing and delivery rates on a number of the sites in the supply. Additional sites should be identified now to aid delivery in the next 5 years. Reserve sites should also be identified to provide a pool of sites that can be drawn upon should the monitoring target against a 25% buffer be triggered. This will ensure a planned approach to delivery, rather than planning by appeal.

DE/064 has been demonstrated to be deliverable through the current outline application and there is clear market demand, with interest from a number of house builders. We therefore consider that the addition of DE/064 could either address the 5 year shortfall now or could be called upon in the case of 25% monitoring target being triggered.

We would welcome a meeting to discuss the inclusion of my client's site in the submission version of the plan. In the interim if you would like to discuss or have any queries please do not hesitate to contact me.