Part 2 Local Plan for Corby
Publication Draft (Pre-Submission)
Regulation 19 Consultation (August 2019)

Representations on behalf of
Great Oakley Farms Ltd and Rockingham Castle Estate,
Taylor Wimpey UK Limited and BDW Trading Limited

September 2019
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APPENDICES

Appendix 1 - West Corby Sustainable Urban Extension Location Plan
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1.0 INTRODUCTION

1.1 Barton Willmore LLP (BW) is instructed by Great Oakley Farms Ltd, Rockingham Castle Estate, Taylor Wimpey UK Limited and BDW Trading Limited (herein referred to as ‘our Clients’) to submit representations to Corby Borough Council’s (the Council) Publication Draft (Pre-Submission) Part 2 Local Plan for Corby (August 2019); herein referred to as the ‘Part 2 Local Plan’.

1.2 Our clients are the promoters of the West Corby Sustainable Urban Extension (the ‘WCSUE’), which is allocated in the adopted North Northamptonshire Joint Core Strategy (July 2016) (the ‘JCS’). Our clients are working collaboratively with the Council to deliver the development identified in the JCS through the submission of an outline planning application. Our clients are also engaged in the Development Plan process (including having made responses to the Regulation 18 Draft Local Plan Part 2) in seeking to ensure the effective delivery of the WCSUE, in particular in relation to the determination of future Reserved Matters Applications (i.e. which will be determined at a time when weight can be attributed to the Part 2 Local Plan).

1.3 The focus of these representations is our clients’ allocated land interests to the west of Corby, collectively known as the West Corby Sustainable Urban Extension (WCSUE). The location of the WCSUE and the boundary of the site covered by the outline planning application is shown on our clients’ Location Plan (Adam Urbanism Ref. RA5845U/LP 01) (see Appendix 1).

About the Clients and their Land Interests

1.4 Our clients have promoted the development of the WCSUE as a strategic development allocation for a period of more than 16 years, most recently through the North Northamptonshire Joint Core Strategy. The Joint Core Strategy was adopted in July 2016 and allocates the West Corby Sustainable Urban Extension as a strategic development allocation (Policy 32).

1.5 Since the start of 2015, officers of the Council and other authorities (including the County Council and the Joint Planning Unit) have worked together with our clients in order to prepare and submit an outline planning application for the delivery of the WCSUE.
1.6 In the period up to June 2016, our clients also engaged in an extensive process of pre-application discussions with the Council and other consultees; received a formal Environmental Impact Assessment Screening Opinion (21st August 2015); participated in a formal design review (with the Council and key consultees); and undertaken public consultation on their draft masterplan proposals.

1.7 Following the above, our clients submitted an outline planning application for development at the West Corby Sustainable Urban Extension, reference: 17/00180/OUT, in April 2017. Outline planning permission is sought for the following:

- Up to 4,500 dwellings (Class C3);
- Accommodation for elderly people (Class C2);
- An employment area of (including up to 46,850 sqm (GEA) of Class B1/B2 uses);
- Two local centres connected by a Mixed-Use Area (including up to 3,000 sqm (GEA) of Class A1-A5 uses, up to 9,750 sqm (GEA) of employment land (Class B1), Class C2/C3 uses, and community, leisure and healthcare uses (Class D1/D2));
- Three primary schools (two 2FE and one 3FE);
- One secondary school (5FE with expansion area for up to an additional 4FE);
- Public open space, informal open space, landscaping, formal and informal play areas, sports pitches (including pavilions), other associated open space, retained green infrastructure and infrastructure including access and habitat creation;
- New accesses for vehicles, pedestrians and cyclists (including two junctions onto the A6003 and one junction and link road onto the A427);
- Internal roads, streets, lanes, squares, footpaths and cycleways;
- Drainage and associated infrastructure works, including sustainable drainage systems (SUDS);
- Associated engineering and service operations (including electricity sub-stations and a foul pumping station);
- Car parking related to the above land uses, buildings and facilities; and
- The demolition of existing buildings.

1.8 The distribution of land uses at the WCSUE, including residential, employment, education, community, open space, site entrances and road corridors are shown on our clients’ Land Use Parameter Plan (Adam Urbanism Ref. RA5845U/PP 01) (see Appendix 2).
1.9  Since the submission of the application our clients have fully engaged with the Council and Northamptonshire County Council (the ‘County council’) in responding to consultation responses received.

1.10 As part of the engagement with the Council, in August 2018, our clients submitted a comprehensive response to comments made on the outline planning application, addressing comments made by statutory consultees, the Council and other respondents. Also in August 2018, and as part of the overall response to comments on the outline planning application, our clients also submitted an Addendum to the Environmental Statement.

1.11 Since August 2018, our clients have continued to engage with the Council, the County Council and other statutory consultees (including Highways England and Rutland County Council) in order bring the outline planning application to Committee on 26th September 2019. This work has included the submission of amended highway layouts and further responses to address flood risk comments. Engagement between the Council and our clients has also included the consideration of viability issues, as part of the process of determining the application and the production of a S106 Agreement.

1.12 The recommendation included in the report to the Committee is to approve the outline planning application following the completion of the required S106 Agreement, subject to the conditions listed in the report.

1.13 Following Committee approval of the outline planning application, our clients will continue to work with the Council in order to complete the S106 Agreement to enable planning permission to be issued.

1.14 Our clients are also currently undertaking design-related work as part of the process of delivering a Site-Wide Design Code (which will be a condition of the outline planning permission); and which will guide the preparation and submission of future Reserved Matters Applications. Based on current estimates, it is anticipated that the first applications will be submitted in 2020 and the delivery of housing will commence during 2021.
Scope of Submission

1.15 In view of the project programme identified above, and having previously been involved in the process of adopting the North Northamptonshire Joint Core Strategy (including participation in the Examination), our clients are committed to the plan making process and seeking to ensure that the Part 2 Local Plan is consistent with the delivery of the development proposals for the WCSUE, as identified in the policies of the JCS and in the outline planning application; and to ensure that the viability of the proposed development is assured. In particular in relation to the determination of future Reserved Matters Applications.

1.16 Having made a number of responses to the Regulation 18 Draft Local Plan Part 2, our clients welcome a number of the changes which have since been made to the Plan by the Council, and which result in there being more consistency with the proposals for the WCSUE. We also wish to reiterate the comment made in our response to the Regulation 18 Draft that our clients wish to work with the Council to ensure that the Local Plan Part 2 is ultimately found sound under the tests of soundness enshrined within the National Planning Policy Framework (NPPF).

1.17 However, we do not consider the Local Plan Part 2 is sound in a number of places and our clients request that further modifications are made to the Plan (as identified in the following representations).

1.18 The following sections include our clients’ individual, and outstanding, objections to the Local Plan Part 2. These objections are made in relation to:

- Policy 1 - Open Space, Sport and Recreation;
- Policy 2 - Health and Wellbeing;
- Policy 6 - Green Infrastructure Corridors;
- Table 7 / Paragraph 7.8 / Appendix 1;
- Policy 12 - Custom and Self-Build; and
- Policy 17 - Settlement Boundaries.
2.0 POLICY 1 - OPEN SPACE, SPORT AND RECREATION

Introduction

2.1 Our clients wish to express their concern over the inflexibility of Policy 1 to treat large-scale individual residential and mixed-use development proposals (in particular the West Corby Sustainable Urban Extension) on their individual merits. In particular, our clients are concerned that Policy 1 rigidly applies the open space standards emanating from "the latest Open Space, Sport and Recreational Facilities Assessment (or similar subsequent documents)" to all developments of 10 or more dwellings or 0.3 hectares in size.

WCSUE

2.2 This blanket approach to the prescription of open space provision fails to allow for proposed developments to provide bespoke and site-relevant public open space and Green Infrastructure designs and schemes. In particular, our clients are very concerned that – if applied to their WCSUE proposals – then appropriately designed open space provision could be refused planning permission (or Reserved Matters Consent) because it is not in accordance with the guidelines included in the Local Plan Part 2 (and its supporting evidence base and text).

2.3 In terms of background to this particular response to the Local Plan Part 2, our clients note the that a significant part of the WCSUE will be dedicated to the provision of green infrastructure (approximately 123.42 hectares) but will not strictly adhere to the type of open space provision standards set in the Local Plan Part 2.

2.4 The WCSUE development will include public open space (including pitches capable of use for football and cricket), landscaping, incidental greenspace, drainage, new planting, play areas, other associated open space and retained green infrastructure including access and habitat creation. The proposals will also include the retention and enhancement of existing woodlands and hedgerows, to provide greenways through the site, including a green spine running north-south and east-west. In addition, the ancient woodland in the southwestern part of the site will, where it is appropriate to do so, include opportunities for enhanced access to walkers as part of the overall recreational offer of the proposed development.
2.5 Our clients also wish to note that, subject to the completion of the S106 Agreement for the WCSUE outline planning application, there are no outstanding unresolved objections from the Council to our clients’ GI and POS proposals; and that detailed elements of these proposals will be the subject of Design Codes (to be conditioned) and Reserved Matters Applications.

2.6 In view of the proposals for GI identified in the outline planning application for the WCSUE, in particular the inclusion of POS in the green corridors within the site, our clients are concerned that Policy 1 and its supporting text is not clear as to whether the Local Plan Part 2 would treat the level and type of POS provision proposed at the WCSUE as being acceptable and appropriate.

2.7 Greater clarity is required in relation to Policy 1 and/or its supporting text in order to confirm that bespoke schemes for public open space provision, in particular on large sites such as the West Corby SUE, which are not in strict accordance with identified standards, can be agreed with the Council.

Other Comments

2.8 Our clients also note the restriction that is imposed on open spaces, allotments, sports and recreational facilities via Policy 1, namely that development that will result in a loss will only be permitted in exceptional circumstances. Our clients do not disagree within this approach and notes the importance of good quality open space, sport and recreation provision, as well as good and sustainable access to these facilities.

2.9 Notwithstanding the above, our clients do not consider point (b) is conducive to the successful regeneration of these facilities. It is noted that, according to the various studies and assessments, many of the facilities within Corby and the surrounds would benefit from investment and in some cases comprehensive reform. In some instances this improvement may indeed be provided via a relocated facility. Turning to point (b) of Policy 1 it is prescribed that the loss of any facility will only be permitted providing: “b) A site of equivalent quality and accessibility can be provided, serviced and made available to the community prior to use of the existing site ceasing;”.
2.10 Our clients submit that any regeneration of a facility, specifically where it involves relocation and is developer funded, will require a form of enabling development. As currently drafted point (b) of Policy 1 effectively applies a pre-commencement condition, where no value from the land can be released until such time as an alternative facility has been provided in its entirety. Moreover, there are a number of variables which cannot be pre-determined, with regard to the delivery of a new facility, funding, Borough Council and County Council input/correspondence etc.

2.11 Amidst the changing profile of Corby with major planned developments, there will be a requirement for amenity provision to keep pace both in terms of capacity and the services that are on offer. Indeed, the relocation of certain facilities may place them in a better catchment to serve the existing and future residents of Corby. As drafted point (b) of Policy 1 has the potential to stifle this regeneration.

2.12 Should the Council wish to control the delivery of the replacement facility, there are other tools available for them to do so, such as conditions attached to a permission and indeed clauses with development S106 Agreements. This provides the flexibility for discussions to take place on a site by site basis.

2.13 Consequently, our clients consider that point (b) should be re-worded as follows to enable a form of enabling development to take place and delivery restrictions to be determined in accordance with the associated development, i.e. "A site of equivalent quality and accessibility can be provided, prior to use of the existing site ceasing".

2.14 Our clients also note that Policy 1 refers to the Open Space, Sport and Recreational Facilities Assessment. However, following a review of the evidence base it is apparent that such a document does not exist, but is assumed instead to be comprised of a number of documents, namely:

- Playing Pitch Strategy Assessment Report
- Playing Pitch Strategy and Action Plan
- Indoor and Built Facilities Assessment
- Indoor and Built Facilities Strategy
- Open Space Assessment
- Open Space Study Standards Paper
2.15 In order for the correct interpretation of Policy 1 to take place, our clients consider that the policy should be reworded, to make clear what documents are being referred to within the text, or that the above reference documents are combined into an Open Space, Sport and Recreational Facilities Assessment.

**Soundness**

2.16 As drafted, the policy included in Local Plan Part 2 relating to open space, sport and recreation is unsound. The lack of clarity in terms of whether bespoke schemes for open space, sport and recreation facilities will be acceptable on large sites, such as the West Corby Sustainable Urban Extension, is not Justified, Effective or Consistent with National Policy in that it does not give certainty to developers as to how to masterplan their developments, particularly where there is a requirement to provide significant areas of POS and provide and enhance Green Infrastructure Corridors to support the local population.

**Request for Modification**

2.17 The following modifications are requested:

- Policy 1 or the Supporting Text is supplemented with text which states that "For larger-scale developments, including the West Corby Sustainable Urban Extension, the level and type of provision of new or improvement open space, sport and recreational facilities will be subject to agreement between the Council and applicant".

- Point (b) should be re-worded as follows to enable a form of enabling development to take place and delivery restrictions to be determined in accordance with the associated development, i.e. "A site of equivalent quality and accessibility can be provided, prior to use of the existing site ceasing".
3.0 POLICY 2 - HEALTH AND WELLBEING

3.1 Our clients note the importance of health and wellbeing and therefore supports the vision of Policy 2.

3.2 Notwithstanding this, our clients consider that there is some erroneous wording contained within the policy; specifically referring to the use of the word ‘walkable’ within point (a) of Policy 2. The supporting text to the policy does not offer an explanation for what is being proposed by the term ‘walkable’ and in any event, it would appear that this term does not sit comfortably with quality, attractiveness and safety, as is currently drafted. Point (b) of Policy 2 covers physical activity, including walking and cycling, therefore the term ‘walkable’ in point (a) is considered a superfluous inclusion.

Soundness

3.3 As drafted, the policy included in Part 2 Local Plan relating to health and wellbeing is unsound. The wording as drafted is not Justified, Effective or Consistent with National Policy in that it is ill defined and duplicates various policy controls included in both the North Northamptonshire Joint Core Strategy and the Part 2 Local Plan.

Request for Modification

3.4 Our clients suggest that either the term walkable is removed from point (a) of Policy 2, or that this term is defined and explained within the supporting text, so that it may be interpreted correctly by developers.
4.0 POLICY 6 - GREEN INFRASTRUCTURE CORRIDORS

- Introduction

4.1 Our clients have previously submitted responses to the Local Plan Part 2 in seeking greater flexibility in the way in which the Plan treats Green Infrastructure (GI) Corridors within the West Corby Sustainable Urban Extension (WCSUE). To this end, our clients support the changes made to Appendix 4 of the Plan (Green Infrastructure Network). The Plan in Appendix 4 of the Plan now refers to the GI corridors within the WCSUE (i.e. a Local GI Corridor and a Neighbourhood GI Corridor) as being indicative. Our clients also support the change in reference to GI corridors made in Paragraph 5.10 of the Plan which refers to them as being ‘indicative’. These are positive changes to the Local Plan Part 2, which should seek to avoid the routes becoming overly prescriptive and prejudicial to the delivery of the WCSUE masterplan (which will be based on the principles shown on the Land Use Parameter Plan – see Appendix 2).

4.2 It is also noted that the GI Strategy for the WCSUE, which will take into consideration the general routes and uses of the Local and Neighbourhood GI Corridors shown in Appendix 4 of the Local Plan Part 2, will be secured by planning condition following the approval of the site-wide masterplan (which will also be secured by planning condition).

- Public Open Space Provision Within GI Corridors

4.3 However, our clients do not consider that Policy 6 and its supporting text is clear as to how the Council will seek to apply this policy in the context of public open space provision for new development, in particular the WCSUE.

4.4 In terms of background to this particular response to the Local Plan Part 2, our clients note the outline planning application for the WCSUE includes proposals for the integration of the proposed development into the surrounding areas. In particular, the proposed WCSUE will include a connected and accessible network of green infrastructure. A significant part of the WCSUE will be dedicated to the provision of green infrastructure (approximately 123.42 hectares), which will include public open space (including pitches capable of use for football and cricket), landscaping, incidental greenspace, drainage, new planting, play areas, other associated open space and retained green infrastructure including access and habitat creation. The proposals also make provision for the retention and enhancement of existing woodlands and hedgerows, to provide greenways through
the site, including a green spine running north-south and east-west. In addition, the ancient woodland in the southwestern part of the site will, where it is appropriate to do so, include opportunities for enhanced access to walkers as part of the overall recreational offer of the proposed development.

4.5 In addition, our clients note that the amount and location of recreation and sport facilities, some of which will be located within the GI Corridors, will be a matter for further discussion with the Council, including where appropriate in the S106 Agreement.

4.6 Our clients also wish to note that, subject to the completion of the S106 Agreement for the WCSUE outline planning application, there are no outstanding unresolved objections from the Council to our clients GI and POS proposals; and that detailed elements of these proposals will be the subject of Design Codes (to be conditioned) and Reserved Matters Applications.

4.7 In view of the proposals for GI identified in the outline planning application for the WCSUE, in particular the inclusion of POS in the green corridors within the site, our clients are concerned that Policy 6 and its supporting text is not clear as to whether the Local Plan Part 2 accepts that the provision of POS within defined GI Corridors does count towards meeting a developers’ obligation towards providing public open space.

4.8 Greater clarity is required in relation to Policy 6 and/or its supporting text in order to confirm that public open space which is provided within Green Infrastructure Corridors does count towards the overall calculation of POS for new developments. This, we consider, is consistent with the Council’s treatment of our clients’ proposals for POS and green infrastructure as part of the determination of the outline planning application for the WCSUE.

**Developer Contributions**

4.9 In addition, our clients are also concerned about the reference at Part (e) of Policy 6 to “using developer contributions to facilitate improvements to their [GI Corridors] improvements”. 

4.10 As drafted, this particular requirement of Policy 6 poses a potential risk to the delivery of new developments, particularly of a large scale (such as the WCSUE). This is because this requirement does not explain what kind of improvements are envisaged or make any allowance for the scale of the site and development or for the viability of the development. Nor does Point (e) refer to a Supplementary Planning Document (SPD) which might detail the future management and improvement of the GI Corridors. In addition, point (e) also does not make any allowance or demonstrate a contribution structure relative to the size of the site. For larger sites the contribution sought might therefore be deemed excessive and disproportionate, and may indeed affect the viability of such developments.

4.11 Our clients consider that greater clarity is required in the wording of Part (e) of Policy 6 and modifications should be made to caveat this requirement, in seeking to avoid this element of the Policy adversely affecting or slowing the delivery of new development.

**Other Comments**

4.12 Our clients also note that when major development is planned, as is currently the case within Corby, a suitable network of green infrastructure is important. However, our clients consider that the Plan needs to ensure complete consistency between its policies, in this instance most notably between Policy 1 and Policy 6. Our clients’ comments in relation to Policy 1 as drafted are, therefore, afforded more weight when the aspirations of Policy 6 are taken into consideration.

4.13 Policy 6 seeks to direct new open space provision towards the GI Corridors, meaning that existing facilities not in these locations could be considered for relocation. In order to achieve the strategic objectives of Policy 6, the restrictions within Policy 1, as commented on above, should be robustly addressed. With the suggested amendments in place, it is considered that the two policies would complement each other.

4.14 Turning to Policy 6 in particular, it is not clear whether the aspirations to include open space provision within GI Corridors will contribute to the obligations placed on the developer, in terms of delivering open space. This should be made clear either within the policy itself or its supporting text.
4.15 In addition, the Council should consider the wording of Policy 6 where it states that "All development must be designed to protect and enhance the existing green infrastructure corridors". Clearly not all development will relate to GI Corridors and therefore as drafted this policy is too onerous.

**Soundness**

4.16 As drafted, the policy included in Local Plan Part 2 relating to Green Infrastructure Corridors is unsound. The lack of consistency between this Policy and Policy 1; the lack of clarity in terms of how the use of GI Corridors for public open space provision is treated and calculated; the lack of clarity as to how development which is not related to GI Corridors will be treated; and the un-caveated requirement for developer contributions is not Justified, Effective or Consistent with National Policy in that it does not give certainty to developers as to how to masterplan their developments, particularly on large strategic sites like the West Corby Sustainable Urban Extension, and particularly where there is a requirement to provide significant areas of POS to support the local population. In addition, the absence of any explanations or caveats relating to the use of developer contributions could lead to further developer uncertainty and concerns over the viability of future development proposals, which could also lead to delays in the delivery of future housing schemes, particularly on large sites like the WCSUE.

**Request for Modification**

4.17 The following modifications are requested:

- Policy 6 Part (e): At the end of the existing text, add the following wording - "subject to evidence of the need, the scale of the site and development; and the viability of the development".

- The wording of the first paragraph of Policy 6 should be reworded to state that: "Development which is close to or adjoins existing green infrastructure corridors, as identified on the policies map, must be designed to protect and enhance these areas, and the connections between them where possible..."
5.0 TABLE 7 / PARAGRAPH 7.8/ APPENDIX 1

Housing Land Supply / Housing Delivery Trajectory

5.1 Our clients note that references in the Local Plan Part 2 to housing delivery at the West Corby Sustainable Urban Extension (WCSUE) are out-of-date and require modification.

5.2 We wish to note that our clients submitted details of their short-term housing delivery programme to the Council as part of their ‘Developer Questionnaire 2018’. This submission identified our clients updated assessment of how many market and affordable dwellings are expected to be delivered in the 5-year period 2018/2019 to 2023/2024. This information was stated as follows:

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<td>NB. Affordable housing provision is indicative and subject to viability negotiations with the Council</td>
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5.3 The total number of dwellings to be delivered within the next five-year period (i.e. which begins in 2019/2020) is approximately 421 dwellings.

5.4 The level of housing delivery over this five-year period involves the first two phases of housing delivery at the WCSUE. Following which, our clients envisage there being a step change in the annual average rate of housing delivery. This is expected to happen as a result of additional sales outlets and areas of development being opened up for development within the WCSUE.

5.5 Although Paragraph 7.7 of the Local Plan Part 2 notes that the advice of developers has “proved important in preparing the housing trajectory for Corby”, the information provided by our clients has not been taken into account by the Council in preparing its Publication Draft (Pre-Submission) Plan, and should be.

5.6 We also wish to add that, in order to assist the Council in maintaining an up-to-date trajectory (as stated in Paragraph 7.7 of the Plan), our clients have reviewed the housing trajectory included at Appendix 1 of the Draft Local Plan Part 2 for the WCSUE for period from 2023/2024 to the end of the Plan period. As a result of our clients’ further
assessment of housing delivery rates in Corby, in particular at the WCSUE, it is estimated that the maximum annual average rate of housing delivery post 2023/2014 is likely to be approximately 250 dwellings per annum, rather than 300 dpa as identified in the Housing Trajectory.

5.7 In view of this further assessment of delivery rates for the WCSUE beyond the first two phases of development (i.e. post 2023/2024), the delivery of housing per annum at the WCSUE is summarised as follows:

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**Soundness**

5.8 As drafted, the information included in Local Plan Part 2 relating to the delivery of housing at the West Corby Sustainable Urban Extension is **unsound**. The use of out-of-date information relating to annual average delivery rates at the WCSUE is not Justified, Effective or Consistent with National Policy in that it does not accurately reflect the delivery of residential development in this strategic development location. Also, because the delivery of housing at the WCSUE forms a key element of the Council’s housing land supply calculations (albeit the difference in overall supply figures is only 80 dwellings between the Council’s estimate for the WCSUE and our clients’ estimate), this change should be reflected in the Local Plan Part 2.

**Request for Modification**

5.9 The following modifications are requested:

(i) Table 7 (line 5) ‘Strategic Allocation in the JCS’ is modified to replace 2,251 dwellings with 2,171 dwellings; and subsequent changes are made to the calculations and figures in Table 7.

(ii) Paragraph 7.8 is modified to refer to the revised total housing supply figure for the period 2011-2031, taking account of the reduced level of supply from the WCSUE during the Plan period, i.e. reduced from 12,044 dwellings to 11,964 dwellings.
Appendix 1 should be modified to make changes to the line relating to ‘West Corby SUE - Estimated Completions’, as identified in the following table, and subsequent changes made to the rest of the trajectory table to account for the changes to the WCSUE housing supply figures.

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6.0 POLICY 12 - CUSTOM AND SELF-BUILD

6.1 We maintain our objection to Policy 12 of the Local Plan Part 2. Our clients consider the policy to be underpinned on questionable assumptions, as a result of which has led to the policy being unduly onerous in terms of its requirements, particularly in relation to the choice of thresholds for qualifying development proposals.

6.2 As a starting point, we note that the Local Plan Part 2 identifies at Paragraph 7.25 that there are only 5 applicants on the Council’s Custom and Self-Build (CSB) Register (this is a reduction from the 31 applicants referred to in the Regulation 18 Draft Local Plan Part 2). The Council also notes that since July 2018 it has introduced eligibility criteria requiring applicants to demonstrate a local connection and availability of finance to build their home.

6.3 Whilst we note that the Council has also stated in Paragraph 7.25 that there only being 5 applicants on the Register “does not necessarily provide a full picture about demand in Corby” for CSB, our clients are wholly unconvinced that there is a sizeable demand for CSB in Corby; and not at the scale indicated in the Three Dragons’ ‘Custom and Self Build Demand Assessment Framework’ Report (December 2018).

6.4 Following a simple critique of the Custom and Self Build Demand Assessment Framework’ Report (December 2018), we note that the Report confirms the maximum number of people joining the register in the three years recorded (i.e. since October 2015) was 14 (see Paragraph 3.4); and that Report confirms that when the eligibility criteria was changed, the number people on the register was reduced to 4 (but rounded up to 5 when projected to a full year).

6.5 Despite this, the Report has modelled demand for CSB as being 50 units per year. This modelling uses: national household profiles of households with a realistic prospect of taking up CSB; types of project undertaken or planned; profile of local population; local housing values; drop out rates reflecting ability to finance; and annual local demand for different types of CSB. If this rate is applied to the current plan period (i.e. 2011 to 2031), the requirement would be 1,000 CSB dwellings.
Part 2 Local Plan for Corby - Publication Draft (Pre-Submission)  
Representations on behalf of the Promoters of the WCSUE  
Custom and Self Build

6.6 We question the use of assumptions which underpin this assessment of CSB; and whether the use of the model accurately reflects the demographic characteristics of Corby Borough. As stated at Paragraph 2.12 of the Local Plan Part 2, the Council acknowledges that Corby has higher than average levels of deprivation, which we consider could have a significant downwards pressure on the potential level of demand which could arise year-on-year during the Plan period for CSB.

6.7 Our clients request that further and more detailed consideration is given to the assessment of annual and total demand over the Plan period for CSB in the Borough. To this end, we would suggest that the level of demand is likely to be nearer to the level of demand currently shown. By comparison with what has been estimated, we consider that even if between 5 and 10 people each year registered and built a serviced CSB plot then only 100 CSB serviced plots would be required in Corby Borough during the Plan period.

6.8 We also wish to note that, as part of the viability discussions with the Council in relation to the WCSUE outline planning application, our clients have indicated that land capable of delivering 60 CSB dwellings will be made available. The majority of which will be during the plan period.

6.9 In view of the above, we consider that the specific requirements for CSB included in Policy 12 should be reviewed and revised, particularly the rationale behind the choice of threshold for selecting sites which should provide serviced building plots for CSB.

Soundness

6.10 As drafted, the policy included in Local Plan Part 2 relating to Custom and Self-Build housing is unsound. The lack of clarity in terms of what is an accurate assessment of demand to build CSB during the Plan period is not Justified, Effective or Consistent with National Policy in that it does not give certainty to either the Council or to developers as to how to negotiate and plan for the provision of this type of housing in the Borough.

Request for Modification

6.11 The following modifications are requested:
Policy 12 (second paragraph) should be reviewed and amended to include a different size threshold of site which should be considered for the provision of serviced building plots for CSB.
7.0 POLICY 17 - SETTLEMENT BOUNDARIES

Omission of Land - The West Corby Sustainable Urban Extension Northern Link Road Corridor

7.1 We maintain our previous objection to the Local Plan Part 2 in relation to definition of settlement boundaries, particularly in relation to the West Corby Sustainable Urban Extension (WCSUE).

7.2 As the Local Plan Part 2 is currently drafted, Plan 5.2 Urban Area Inset Map and Plan 5.1 Corby Borough Policies Map (Appendix 5 – Policies Map) do not identify the full extent of the WCSUE within the settlement boundary and the Urban Area of Corby. In particular, the defined settlement boundary does not include the land which is identified by our clients in the outline planning application for the northern link road between the main body of the site and the A427. Only a short stretch of the northern link road is currently shown on the Policies Map. This additional land, which is not identified on the Proposals Maps is shown on our clients’ Location Plan and Land Use Parameter Plan (see Appendix 1 and Appendix 2).

7.3 The inclusion of the northern link road within the WCSUE’s development proposals is essential to the delivery of the overall scheme. Indeed, the identification of the vehicular access point from the A427 is a requirement of Policy 32 (Part (h)) of the North Northamptonshire Joint Core Strategy.

7.4 The omission from the Local Plan Part 2 of the land which is required for the northern link road and A427 access fails to assist our clients in delivering their proposed development at the WCSUE. In this regard, our clients are concerned that when details of the northern access road are submitted to the Local Planning Authority for determination as part of a Reserved Matters Application, the majority of the route will be deemed to be within the ’open countryside’; and not strictly in accordance with the policies of the Local Plan Part 2.

7.5 The omission of the northern link road corridor from the settlement boundary is also contrary to the supporting text in the Local Plan Part 2, in particular Paragraph 8.5 which states that:
"It is important to note that the settlement boundary is a policy line applying Local Plan policies to a specific area, thereby giving a sound and consistent basis for the determination of planning applications. It does not attempt to define settlement limits in physical or social terms. The settlement boundaries have been carefully considered, taking into account a range of criteria including the form of the settlement and existing planning permissions."

7.6 In this regard, our clients note that the WCSUE is the subject of a specific allocation in the JCS for delivery during the Plan period; and the proposed development – which is the subject of an outline planning application (prepared in accordance with the JCS allocation) - requires a sound and consistent basis for its determination.

**Soundness**

7.7 As drafted, this element of the Local Plan Part 2 is **unsound**. The omission of the WCSUE northern link road corridor from the Policies Maps and Corby Settlement Boundary is not Justified, Effective or Consistent with National Policy in that it will not positively assist our clients in delivering the WCSUE.

**Request for Modification**

7.8 It is requested that both Plan 5.2 Urban Area Inset Map and Plan 5.1 Corby Borough Policies Map (Appendix 5 – Policies Map) are amended to identify the full extent of the WCSUE Northern Link Road. This is shown on the Location Plan and Land Use Parameter Plan in **Appendix 1** and **Appendix 2** and as highlighted in the Plan below.
7.9 In particular, it is requested that the corridor of land which already protrudes from the WCSUE site (as shown on Plans 5.1 and 5.2) is simply extended northwards until it reaches the A427. In doing so, the width of the corridor will allow sufficient scope for the delivery of the road and the associated surface water balancing and type of junction proposal on the A427. For ease of reference, please refer to the annotated plan below:
8.0 CONCLUSIONS / PROPOSED MODIFICATIONS

8.1 Our clients are the promoters of the West Corby Sustainable Urban Extension (the 'WCSUE'), which is allocated in the adopted North Northamptonshire Joint Core Strategy (July 2016) (the 'JCS'). Our clients are committed to the plan making process and seeking to ensure that the Part 2 Local Plan is consistent with the delivery of the development proposals for the WCSUE, as identified in the policies of the JCS, and in the outline planning application which has been submitted to the Council and is due for determination in the near future; and to ensure that the viability of the proposed development is assured. In particular, in relation to the determination of future Reserved Matters Applications.

8.2 Having made a number of responses to the Regulation 18 Draft Local Plan Part 2, our clients welcome a number of the changes which have since been made to the Plan by the Council, and which result in there being more consistency with the proposals for the WCSUE. However, we do not consider the Local Plan Part 2 is sound in a number of places and our clients request that further modifications are made to the Plan.

8.3 Our clients’ proposed modifications are identified below:

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<tr>
<th>Policy Paragraph Table Appendix</th>
<th>Sound or Unsound</th>
<th>Proposed Modifications</th>
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| Policy 1                        | Unsound          | Policy 1 or the Supporting Text is supplemented with text which states that “For larger-scale developments, including the West Corby Sustainable Urban Extension, the level and type of provision of new or improvement open space, sport and recreational facilities will be subject to agreement between the Council and applicant”.  
Point (b) should be re-worded as follows to enable a form of enabling development to take place and delivery restrictions to be determined in accordance with the associated development, i.e. “A site of equivalent quality and accessibility can be provided, prior to use of the existing site ceasing”. |
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<th>Policy Paragraph Table Appendix</th>
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<tr>
<td>Policy 2</td>
<td>Unsound</td>
<td>Our clients suggest that either the term walkable is removed from point (a) of Policy 2, or that this term is defined and explained within the supporting text, so that it may be interpreted correctly by developers.</td>
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<td>Policy 6</td>
<td>Unsound</td>
<td>Policy 6 Part (e): At the end of the existing text, add the following wording - “subject to evidence of the need, the scale of the site and development; and the viability of the development”. The wording of the first paragraph of Policy 6 should be reworded to state that: “Development which is close to or adjoins existing green infrastructure corridors, as identified on the policies map, must be designed to protect and enhance these areas, and the connections between them where possible...”</td>
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<td>Table 7/ Paragraph 7.8/ Appendix 1</td>
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<td>(i) Table 7 (line 5) ‘Strategic Allocation in the JCS’ is modified to replace 2,251 dwellings with 2,171 dwellings; and subsequent changes are made to the calculations and figures in Table 7. (ii) Paragraph 7.8 is modified to refer to the revised total housing supply figure for the period 2011-2031, taking account of the reduced level of supply from the WCSUE during the Plan period, i.e. reduced from 12,044 dwellings to 11,964 dwellings. (iii) Appendix 1 should be modified to make changes to the line relating to ‘West Corby SUE - Estimated Completions’, as identified in the following table, and subsequent changes made to the rest of the trajectory table to account for the changes to the WCSUE housing supply figures.</td>
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8.4 On behalf of our clients we trust that the comments and views contained within these representations are helpful and importantly are viewed as constructive. As ever, our clients are keen to work collaboratively with the Council and interested parties and would welcome the opportunity for further discussions on any of the matters raised.
APPENDIX 1

West Corby Sustainable Urban Extension Location Plan
Adjacent Properties and Boundaries are shown for illustrative purposes only and have not been surveyed unless otherwise stated. All areas shown are approximate and should be verified before forming the basis of a decision. Do not scale other than for Planning Application purposes. All dimensions must be checked by the contractor before commencing work on site. No deviation from this drawing will be permitted without the prior written consent of the Architect. The copyright of this drawing remains with the Architect and may not be reproduced in any form without prior written consent. Ground Floor Slabs, Foundations, etc. All work below ground level is shown provisionally. Inspection of ground condition is essential prior to work commencing. Redesign may be necessary in the light of soil conditions found. The responsibility for establishing the soil and sub-soil conditions rests with the contractor.

Location Plan
West Corby Urban Extension
PROJECT TITLE

DRAWING No. 03/2017
SCALE 1:1000
DATE 03/2017

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APPENDIX 2

West Corby Sustainable Urban Extension Land Use Parameter Plan