Part 2 Local Plan for Corby

Publication Draft Pre-Submission Consultation (Regulation 19)

GLADMAN

September 2019
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**APPENDICES**

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1 INTRODUCTION

1.1.1 This representation is made by Gladman in response to the Publication Draft (Pre-Submission) consultation on the Part 2 Local Plan for Corby, which runs between 5th August and 16th September 2019. Following the close of this consultation, it is noted that the Council will submit the Local Plan to the Secretary of State for its Examination.

1.1.2 The Part 2 Plan is being prepared by Corby Borough Council following the adoption of the North Northamptonshire Joint Core Strategy (NNJCS) in July 2016. The NNJCS covers the period 2011 to 2031 and outlines the strategic elements of the development plan, anticipating the preparation of Part 2 Plans in each participating District and Borough, including Corby, to “flesh out the detail in response to local issues1”.

1.1.3 Gladman have considerable experience in a number of sectors of the development industry, including residential and employment development. We understand therefore the need for the planning system to provide communities access to decent homes and employment opportunities. Gladman also have considerable experience contributing to the Development Plan preparation process, through representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of this experience that the comments are made in this representation.

1.2 Context

1.2.1 Following an initial consultation on the scope and contents of the Issues and Options and Emerging Draft Options Consultation, the Council has prepared its Pre-Submission Version of the Part 2 Plan, now the subject of public consultation. The Part 2 Plan sets the planning framework guiding development over the same plan period - 2011 to 2031 – as the NNJCS.

1.3 Previous Submissions

1.3.1 Gladman submitted representations on the scope and contents of the Local Plan Issues and Options consultation which was conducted in November/December 2016.

1.3.2 Gladman subsequently submitted detailed representations, including site submissions, in response to the Local Plan Emerging Draft Options Consultation which was conducted in the summer of 2018.

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1 Paragraph 2.53, North Northamptonshire Joint Core Strategy
### 1.4 Summary of Representations

1.4.1 The following table provides a summary of the representations being made by Gladman at the Regulation 19 stage of the plan making process. It is requested that we are provided with the opportunity to discuss these issues further at the relevant Examination hearings that will follow the submission of the Plan to the Secretary of State:

<table>
<thead>
<tr>
<th>Policy / issue</th>
<th>Sound/Unsound</th>
<th>Test of Soundness</th>
<th>Reason</th>
<th>Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy 1 – Open Space, Sport and Recreation</td>
<td>Comment</td>
<td>Justified</td>
<td>It is essential that requirements for open space, sport, recreation facilities are justified in the Council’s evidence</td>
<td>NPPF, PPG</td>
</tr>
<tr>
<td>Policy 6 – Green Infrastructure Corridors</td>
<td>Unsound</td>
<td>necessary in planning terms; related to the development; fairly and reasonably related in scale and kind to the development</td>
<td>Vital that evidence justifies approach, to seek developer contributions to facilitate qualitative improvements</td>
<td>NPPF, PPG</td>
</tr>
<tr>
<td>Policy 7 – Local Green Space</td>
<td>Comment</td>
<td>justified</td>
<td>It is essential that any LGS proposals are sufficiently justified through the Council’s evidence base</td>
<td>NPPF, PPG</td>
</tr>
<tr>
<td>Policy 8 – Employment Land Provision</td>
<td>Comment / unsound</td>
<td>Consistent with National Policy</td>
<td>Policies relating to employment land should include wording responsive to changing needs over time.</td>
<td>NPPF, PPG</td>
</tr>
<tr>
<td>Policy 11 – Delivering Housing</td>
<td>unsound</td>
<td>Positively Prepared Justified Effective</td>
<td>The policy is not sufficiently flexible to ensure that housing needs will be met over the plan period, given past trends.</td>
<td>NPPF, PPG, Housing Trajectory</td>
</tr>
<tr>
<td>Policy 12 – Custom and Self-Build</td>
<td>unsound</td>
<td>Justified</td>
<td>Consistent with National Policy</td>
<td>The proposed approach to requiring serviced plots for self build and custom build housing does not reflect the council’s published evidence base relating to need, or the associated requirements contained in national policy. Any delays to the delivery of housing as a result of policy requirements of this nature should be fully reflected within the Council’s housing trajectory</td>
</tr>
<tr>
<td>Policy 15 – Specialist Housing and Older People’s Accommodation</td>
<td>Comment</td>
<td>Justified</td>
<td>Consistent with National Policy</td>
<td>Any requirements for older persons housing standards must be fully justified within the Council’s evidence.</td>
</tr>
<tr>
<td>Policy 17 – Settlement Boundaries</td>
<td>unsound</td>
<td>Positively Prepared</td>
<td>Effective</td>
<td>Consistent with National Policy</td>
</tr>
</tbody>
</table>

**Table 1: Summary of Representations**

1.4.2 In addition, Gladman are promoting the following site through the local plan making process, which is located in a sustainable location and is suitable, available and achievable:

- Land North of Southfield Road, Gretton
2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework (NPPF)

2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework (NPPF 2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF (2018) consultation.

2.1.2 The 2018 version of the NPPF was itself superseded on 19th February 2019, with the latest version amending policy regarding Appropriate Assessment, as well as other minor clarifications to wording. Therefore, the NPPF 2019 is the basis upon which these representations are made.

2.1.3 The revised Framework introduces a number of major changes to national policy. The changes reaffirm the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas they cover. These should outline the housing, economic, social and environmental priorities to help shape future local communities. In particular, paragraph 16 of the NPPF states that Plans should:

“Be prepared with the objective of contributing to the achievement of sustainable development;

Be prepared positively, in a way that is aspirational but deliverable;

Be shaped early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Be accessible through the use of digital tools to assist public involvement and policy presentation; and

Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”
2.1.4 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount of variety of land that can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.

2.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method as set out in the PPG unless exceptional circumstances justify an alternative approach. It is imperative that the emerging Local Plan is formulated on the basis of meeting this requirement as a minimum.

2.1.6 Once the minimum number of homes that is required is identified the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing need. It states:

“Strategic policy making authorities should have a clear understanding of the land available in their areas through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Strategic plans should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period, and;

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

2.1.7 Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes in paragraph 11 (b) i. considering the application of policies such as those relating to Green Belt and AONB and, giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type or distribution of development. Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided, where significant adverse
impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

2.1.8 Corby, as part of the North Northamptonshire Authorities, is located within the Oxford-Cambridge Arc – a nationally significant opportunity for transformational growth. Measures to accelerate delivery of planned housing and employment growth have been identified. Corby will therefore need to plan positively to build on existing infrastructure improvements such as the railway station and, continue to meet the economic growth ambitions of the wider area within any updated Local Plan for North Northamptonshire.

2.1.9 In this regard, Local Planning Authorities need to review and update their plans in the context of the NPPF and PPG. This is particularly pertinent in Corby because the Part 1 Plan is now at three years post-adoption. By the time the Corby Part 2 Plan reaches a stage whereby it can be adopted, the Part 1 will be into its fourth year.

2.1.10 The NPPF 2019 (paragraph 35) sets out four tests that must be met for Local Plans to be considered sound at Examination. In this regard, we submit that in order to prepare a sound plan it is fundamental that the Corby Local Plan is:

*Positively Prepared* – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

*Justified* – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

*Effective* – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

*Consistent with National Policy* – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

2.2 Planning Practice Guidance

2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the NPPF (2018/19) should be interpreted when preparing local plans. In particular, the updated Housing Needs Assessment chapter confirms that the NPPF expects local planning authorities
to follow the standard method for assessing local housing needs, and that the standard method identifies the minimum housing need figure and not a final housing requirement.

2.2.2 The calculation of objectively assessed needs (OAN) for housing has been a subject of much debate as part of Local Plan examinations and s.78 appeals since its initial introduction through the NPPF in 2012. To simplify the assessment the Government, through the Revised Framework, has introduced the standardised method which should be undertaken through the 3-stage process outlined in the PPG².

2.2.3 Notwithstanding the above, it is important to note that whilst the standard methodology to assess housing needs has been introduced, it is likely that this will be subject to further change. In this regard, it is currently anticipated that the standard method will be adjusted to ensure that the starting point in the plan-making process is consistent with the Government’s proposals in Planning for the Right Homes in the Right Places consultation, to ensure that 300,000 homes are built per annum by the mid-2020s. This follows the release of the 2016 based household projections in September 2018, which forecast a lower level of household growth than previously envisaged.

2.2.4 Whilst the PPG advises that the standard method is not mandatory, there is an expectation that other methods can only be used in exceptional circumstances. Indeed, the PPG is clear that the standard method only identifies the minimum number of housing required to meet population needs and does not take into account the variety of factors which may influence the housing required in local areas such as changing economic circumstances or other factors which may change demographic behaviour. Where additional growth above historic trends are likely to occur then local planning authorities should include an appropriate uplift to the housing numbers to meet the need in full. It is important that this uplift is undertaken prior to and separate from the consideration of the demographic baseline assessment of need and how much of this need can be accommodated in a housing requirement figure. Circumstances where the need to apply an uplift may be appropriate include, but are not limited to:

“growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);

² PPG – 004 Reference ID: 2a-004-20190220
strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or

an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.3“

2.2.5 In addition, it is also important for local planning authorities to consider the implications the standard method will have on delivering affordable housing need in full. The PPG is clear that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by market housing led development. If it becomes clear that affordable housing need will not be delivered in full then an increase to the total housing figures included in the plan should be considered where it could help to deliver the required number of the affordable homes.

2.3 Sustainability Appraisal

2.3.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.

2.3.2 Critically, the current NPPF 2019 at Paragraph 32 sets out that:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements17. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse

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1 PPG - 010 Reference ID: 2a-010-20190220
impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”

Following this the Planning Practice Guidance (PPG) requires that different realistic and deliverable options for policies within the Plan are tested, setting out:

“‘They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.’”

2.3.3 The SA is required to set out why those reasonable alternatives were chosen. In terms of housing policies for the Plan this means the need to test:

i. Reasonable alternatives on the quantum of development (i.e. the housing requirement); and,

ii. Reasonable alternatives on the distribution of development (i.e. the spatial strategy and combination of site allocations to be made).

2.3.4 The Corby Part 2 Plan should be based on an SA process that clearly justifies its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the decision making and scoring should be robust, justified and transparent.

2.3.5 Gladman remind the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in a local plan failing the test of legal compliance at Examination or being subjected to legal challenge.

2.3.6 Gladman would also wish to highlight that the SA must identify and assess all reasonable alternatives in a consistent manner using the information that is made available to the Council through site submissions during the plan preparation process. The site selection process should not arbitrarily discount sites from consideration. In addition, the Sustainability Appraisal must provide adequate reasoning and justification for the sites that are allocated or rejected for allocation. The PPG5 explains that sustainability appraisals should outline the reasons why the alternatives were selected, the reasons why the rejected options were not

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4 PPG Ref ID: 11-018
5 PPG Ref ID: 11-018-20140306
taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach within the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.

3 PART 2 LOCAL PLAN FOR CORBY – PUBLICATION DRAFT

3.1 Introduction

3.1.1 The North Northamptonshire Joint Core Strategy (NNJCS) forms the Part 1 Plan for Corby and was adopted in July 2016. The text contained within the Part 2 Local Plan Publication draft (Pre-Submission) explains that its context is already set by the NNJCS, including the ‘big picture’ in terms of housing and jobs targets for North Northamptonshire and the associated spatial framework for growth. It is however important that the Council remains mindful of the need to carefully monitor the progress of the NNJCS Local Plan policies, particularly the baseline housing trajectory that was considered through the associated Examination in Public.

3.1.2 The NNJCS Inspector’s Report sets out the importance of having an appropriate monitoring mechanism in place to trigger swift action in the event of a significant shortfall in housing arising for whatever reason(s). The challenging nature of delivering against the NNJCS targets remains highly relevant and this should be borne in mind in the preparation of the Part 2 Plan, in particular the need to provide flexibility to rapidly adapt to changes in circumstance that can occur during a plan period.

3.1.3 The comments that follow relate to the proposed policies that are contained in the Part 2 Local Plan for Corby Publication Draft (Pre-Submission).

3.2 Policy 1 – Open Space, Sport and Recreation

3.2.1 Gladman note the amended wording of Policy 1, clarifying that only housing development of more than 10 dwellings or over 0.3 hectares will be required to provide new or improved open space, sport and recreational facilities. We also acknowledge the wording articulating that new or improved facilities will only be required to meet the direct needs arising from the new development.

3.2.2 It is essential that any requirements relating to the provision of new open space, sport and recreational facilities can be justified through the Council’s proportionate evidence base. This should fully recognise the existing provision of facilities across the area in both quantitative and qualitative terms.
3.3 Policy 6 – Green Infrastructure Corridors

3.3.1 It is noted that the Council intends to protect Green Infrastructure Corridors through the Part 2 Local Plan. The proposed wording of the policy indicates that all development must be designed to protect and enhance the green infrastructure corridor. It is vital that the evidence base that sits behind this policy fully justifies the proposed approach, particularly if this is to be used to seek developer contributions to facilitate qualitative improvements. It must be made clear within the policy wording that new green infrastructure or qualitative improvements to existing areas should only be required to meet the direct needs that arise from that specific development.

3.4 Policy 7 – Local Green Space

3.4.1 Noting that the Local Plan defers the allocation of Local Green Spaces to Neighbourhood Plans, the Council will need to ensure that such Plans do not seek to pursue this option without first ensuring that sufficient evidence exists to fully support a significant designation of this kind.

3.4.2 Paragraphs 99 to 101 of the NPPF (2019) set out the national policy position in relation to Local Green Space designations and outline the following tests, which need to be met in order to designate Local Green Space through the plan making process:

- the green space must be in reasonably close proximity to the community it serves;
- the green space must be demonstrably special to a local community and hold particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;
- the green space must be local in character and is not an extensive tract of land

3.4.3 As outlined through national policy, the Council (or the Qualifying Body that is preparing a Neighbourhood Plan) need to have clear justification for designating land as Local Green Space, and they should not attempt to use this as a means to arbitrarily protect areas of land from development.

3.4.4 If a local green space is to be brought forward through a local plan or neighbourhood plan, it will be essential that any evidence that emerges through the plan making process is compelling and demonstrates that any such allocation meets national policy requirements. This includes the need for designations to be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and essential services
within the area. In this context, any such designations should also be capable of enduring beyond the end of the Plan.

3.4.5 In relation to the proposed technical guidance, Gladman would raise a concern that the Council’s proposed technical guidance is suggesting that 19ha is a threshold for determining whether an area is an ‘extensive tract of land’. Whilst the particular source of this standard notes that 19ha is an extensive tract of land, it does not determine that sites below this size should not also be considered as such. The determination of whether an area is an extensive tract of land will differ from case to case depending on the location of the site and it could well be relevant to conclude that an area of land forms an ‘extensive tract’ where it is substantially smaller than 19ha.

3.4.6 The PPG provides further clarity on the designation of Local Green Space, stating:

“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.”

3.5 Policy 8 - Employment Land Provision

3.5.1 It is noted that the Council has worked with consultants to update its Employment Land Review (May 2019), which provides a snapshot in time of the likely demand for employment land and sets associated supply requirements for the period 2011 to 2031. The intention to identify a long-term land reserve in addition to a small suite of ‘non-strategic site allocations’ is noted. This approach will provide a degree of flexibility to assist the ability of the policies of the Plan to respond to evidence of additional need during the plan period should it arise in those particular locations.

3.5.2 Notwithstanding this, in order to support economic growth and productivity, it will be necessary to provide further flexibility through the wording of Policy 8 to enable employment development to come forward where the need can be demonstrated (subject to wider sustainability considerations). The NPPF requires employment policies to be flexible enough

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to accommodate needs not anticipated in the Plan and to enable a rapid response to changes in economic circumstance. Policies relating to employment land should therefore include suitably permissive wording that is fully responsive to changing needs over time, recognising the specific locational requirements of businesses.

3.6 Policy 11 – Delivering Housing

3.6.1 The Draft Part 2 Local Plan provides an indication of the current housing land supply relative to the requirements of the NNJCS as at 31st March 2019. Subject to the successful delivery of all Strategic Allocations in the NNJCS, Corby estimate a surplus of 2,844 dwellings over the plan period, equating to 30% above the housing requirement. Clearly, to achieve this ambitious estimate, Corby would require a significant uplift in delivery from an average of 455 dwellings per annum (d.p.a.) between 2011 and 2019, up to 700 d.p.a. average over the remaining 12 years of the plan period. The Part 2 Plan’s high and sustained annual housing prediction over the plan period to 2031 sits in the context of three housing allocations (the former H2, H3, H7) having been deleted since the Emerging Draft Options consultation which, together would have delivered some 176 dwellings. It is vital therefore that the Part 2 Plan provides a realistic position against which a rolling five year supply of housing land can be effectively maintained throughout the plan period.

3.6.2 Gladman consider it essential that development plans provide enough headroom within their housing allocations in order to reduce the likelihood of circumstances where a five-year housing land supply cannot be demonstrated during the plan period. On 25 June 2018, the Rt Hon Sir Oliver Letwin MP published his draft analysis\(^7\) on the gap between housing completions and the amount of land that benefitted from a local plan allocation or a planning consent. This highlighted that completions on strategic scale sites that have been allocated within local plans or granted outline consent may be held back for a wide range of legitimate reasons, including: the discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing.

\(^7\) Independent Review of Build out Rates – Draft Analysis, Rt Hon Sir Oliver Letwin MP, June 2018
3.6.3 The local plans across the North Northamptonshire area are highly dependent on the delivery of housing from large scale sustainable urban extensions. It is therefore important that a wide supply of individual small and medium scale sites can be made available through Part 2 Plans to support the maintenance of land supply and assist in providing choice and competition in the market. Gladman would advocate the inclusion of a flexible approach to managing growth in sustainable settlements across the borough. There will be a continued need to enable the supply of sites in sustainable locations to support the levels of growth that are required over the remainder of the plan period and maintain a rolling 5 year housing land supply.

3.6.4 In this regard, the NNJCS Inspector’s Report notes, “it is also essential to ensure that, in the event of the SUEs not delivering new housing as presently envisaged, for whatever reason, a suitable and sufficient system is in place to address problems as soon as reasonably practical so that the Plan’s strategy is not thereby stalled. For that reason, it is important that the monitoring and implementation section of the Plan in particular is suitably flexible to provide a way forward, without leading to the need for a complete review”

3.6.5 Furthermore, the NNJCS notes that, for rural areas “Part 2 Local Plans and/or Neighbourhood Plans may test higher levels of growth to address local needs and opportunities”.

3.6.6 Two alternatives were indeed assessed in the Part 2 Plan Sustainability Appraisal, although neither of these comprise higher levels of growth. The first one assesses a scenario to ‘Only plan to meet needs set out in the Joint Core Strategy’ which notes,

“Corby needs to demonstrate that a 5 year supply of housing can be provided, as well as allowing for flexibility and choice. If the plan did not make additional housing allocations to take the overall total above the 9,200 units identified in the JCS, then the Plan would be at risk of being found unsound as a substantial proportion of commitments and allocations are within the SUEs.”

3.6.7 However, to some extent, the Part 2 Plan still relies upon windfalls as a significant component of its supply. The second scenario considering ‘Increased growth in ‘rural areas’ instead of Corby’ concludes at paragraph 5.22 that, “it is presumed that such growth would be in addition to that in Corby, rather than a substitute (and would be small scale)”, as has been the situation until now, prior to the adoption of part 2.
3.6.8 It is also noteworthy to highlight that the affordability of housing within Corby since the start of the plan period is a growing issue. The following table sets out the relevant affordability data relating to lower quartile house prices and lower quartile earnings ratios:

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<td>7.52</td>
<td>7.72</td>
<td>7.91</td>
<td>8.00</td>
</tr>
</tbody>
</table>

*Italics mean that annualised weekly earnings are used instead of annual earnings.*

3.6.9 The NNJCS is delivering its urban-focused housing requirement slower than anticipated at Corby, meaning a review of the Part 2 Plan’s overarching housing strategy is becoming increasingly necessary. This approach would align with the ongoing growth at rural settlements already underway in the Borough. In this way, development spread between the rural settlements is continuing outside the parameters of the plan, yet is serving to actively redress the undersupply caused by the NNJCS failure to deliver sufficient housing at Growth Towns, such as Corby.

3.6.10 The Part 2 Plan in Corby provides the opportunity to address these trends, within the bounds afforded to it in the NNJCS, by taking a positive response to enabling the delivery of further housing across a wider range of local markets.

3.7 Policy 12 – Custom and Self-Build

3.7.1 Gladman note the proposal in Policy 11 to require the consideration of self-build plots within housing development proposals over 20 dwellings. Sufficient flexibility should be built into any such policy to ensure that plots within development schemes are not prevented from coming forward as a result of the lack of demand for such products, enabling the housebuilder to develop the plots where demand for self-build is not forthcoming. Furthermore, the Council’s Self Build Register includes only 5 entries, which will then be subject to further reassessment for local eligibility criteria and financial solvency. This does not provide the justification for a policy approach for plots to be reserved within housing sites greater than 20

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8 [https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowquartileandmedian](https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowquartileandmedian)
dwellings for these products. A range of other reasonable alternatives should be explored by the Council to meet the need that has been identified through the register, such as the use of an exception site policy for self-build and custom-build schemes.

3.7.2 Gladman acknowledge the Custom & Self Build Demand Assessment (December 2018) evidence base produced following the Emerging Draft Options Consultation. The demand assessment model indicates that potential demand for custom and self-build plots exceeds what the register would suggest. Nonetheless, it remains to be seen what impact the policy will have on potential delays in delivery, which should be reflected in the Council’s housing trajectory and evidence of whole plan viability. Gladman would wish to raise concerns at this stage that the wording of the policy is not sufficiently responsive to circumstances that will arise on a site-by-site basis, particularly where there is lower demand for this type of product in a particular location.

3.7.3 It is worthwhile noting the outcome of the Examination of the Bedford Local Plan on this matter. Following the hearings, the Inspectors wrote to the Council, setting out the modifications to make the plan sound.

“During the hearings the evidence base supporting the policy was discussed and the Council confirmed that although Bedford Borough’s register has been in place since April 2016 and shows 193 individuals and one association of two individuals registered with the Council, the register has not been reviewed to ascertain whether all those on the list are still seeking a plot. It has therefore not been possible to determine whether the Council’s policy is reasonable or responds proportionately to need and so we cannot conclude that the policy is justified by the available evidence.

In light of the recommendation to carry out an early review, we therefore recommend that the policy is removed from the plan in order that it is justified and effective”

3.7.4 Given that the outcome required deletion of the policy, it is advisable to re-assess the Council’s Self build register to ensure that it remains applicable and representative of demand.

3.8 Policy 15 – Specialist Housing and Older People’s Accommodation

3.8.1 Policy 30 of the NNJCS relates to Housing Mix and Tenure and sets out the overall approach that will be taken when considering the size and tenure of new housing and in encouraging development to meet the needs of particular groups. It is also noted that the accompanying
text to Policy 30 within the NNJCS highlights that Part 2 Plans may identify more specific requirements for particular locations.

3.8.2 The approach that is proposed in the Part 2 Plan for Corby is to encourage the provision of a proportion of housing to meet the needs of older households on schemes of 50 or more dwellings, or 1.4ha or more. Any such requirement would need to be carefully justified. Gladman would suggest that the Council should seek to ensure that there are appropriate sites allocated within the Plan to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites above a certain threshold size. Indeed, the housing needs of older people is a diverse sector with a wide range of products and locational requirements, so the Local Plan Part 2 should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations. The opportunity to include an exceptions policy for specific forms of specialist housing, including older persons accommodation should be considered to ensure that these forms of development can be brought forward in locations where evidence of need exists. Furthermore, the inclusion of exceptions policies to support the needs of other specific groups should also be considered, such as entry level housing.

3.9 Policy 17 – Settlement Boundaries

3.9.1 Gladman object to the use of settlement limits as they preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. The proposed approach would prevent appropriately sited and sustainable development from coming forward to meet the Borough’s housing needs, in accordance with the Presumption in Favour of Sustainable Development. The setting of strict settlement limits does not allow adequate flexibility for development to come forward outside the settlement boundary if this is required (for example due to a shortfall of housing land).

3.9.2 Instead, Gladman advocate a flexible criterion-based approach to determining the suitability of a development proposal. In a borough such as Corby with several wide-ranging settlements, this approach would be more consistent with the Framework in seeking to support thriving rural communities within the countryside, supporting economic growth in rural areas (notably the retention and development of local services and facilities) as well as supporting development that would maintain or enhance the vitality of rural communities. As
a good example of a similar approach Gladman reference Policy HOU5 – Residential Windfall Development in the Countryside of the Ashford Local Plan (Appendix 2).

3.9.3 It is considered important for this approach to be followed for the policy to remain effective for the duration of the plan period. The Council is already facing development pressures on the edge of rural settlements, in excess of that anticipated or allowed for as windfalls in the Part 1 Plan, which does not recognise the rural settlements as sustainable locations for growth.

3.9.4 In July 2021, the North Northamptonshire Joint Core Strategy (NNJCS) will become 5 years old. It is likely that prior to the commencement of a JCS Review, the Council will continue to face pressure for development outside the settlement confines, greater than that defined through the Local Plan. The flexible approach suggested by Gladman will retain control of where this development would be supported if the confines needed to be relaxed to maintain a 5-year housing land supply. This is all the more relevant as the Inspector in a recent appeal (APP/U2805/W/17/3176172) found “it would be unsafe to conclude that there is a 5 year supply”.

3.9.5 Whilst the Part 2 Plan’s policy stance mirrors that of the NNJCS, in focussing development on the main urban centre of Corby, it is thus far proving ineffective at maintaining at least a five year housing land supply in the Borough. Gladman accede that inserting a degree of flexibility into the plan, as at Ashford, would provide a much-needed contingency to boost housing supply.

3.9.6 It is also essential that choice and competition in the market is supported in villages, taking into account the position in the NNJCS that the phasing of individual housing sites in the rural areas will need to ensure that development opportunities are not exhausted early in the plan period (Policy 29). The decision to proceed with an approach that fails to allocate additional sites for housing development in the rural area does not fully reflect the approach that is advocated in the NNJCS, which seeks to ensure that development opportunities remain available in rural areas throughout the plan period.

3.9.7 The Part 2 Plan should not rule out allocating sites outside the settlement boundary if the settlement is sustainable. Gladman consider that the proposed approach to development beyond settlement boundaries is too restrictive and should be revised. In response, Gladman suggest a changed emphasis to a criteria-based approach to support sustainable development at suitable locations; Policy HOU5 of the Ashford Local Plan provides a framework in which decisions can be made about windfall development proposals located beyond the settlement boundary. The policy allows development required to support the
vitality and vibrancy of the rural areas and enables the delivery of rural housing needs where these are not met by allocations and commitments, should the planned growth at Corby continue to fail to deliver.

3.9.8 The Policy includes the necessary safeguards to prevent unsustainable patterns of development. Its application as part of the Part 2 Plan will ensure that the spatial strategy of the NNJCS is not undermined.

3.9.9 Gladman consider that the adoption of a policy similar to Policy HOU5 of the Ashford Local Plan in the case of the Part 2 Plan will help boost housing delivery, increasing the prospect that the housing requirement can be achieved by providing the necessary uplift in housing land supply required to meet identified housing need.

Role of Sustainable Urban Extensions

3.9.10 Sustainable Urban Extensions have been used in the JCS to underpin the sustainable growth of North Northamptonshire and contribute massively to the delivery of housing across the combined authorities, particularly so in Corby. Para 9.14 of the NNJCS states the delivery of the NNJCS is largely reliant on the timely delivery of the sites.

3.9.11 The majority of housing development in the JCS is focused in the towns of Corby, Kettering and Wellingborough; however, these settlements have not accommodated the amount of development that was planned in the first Core Spatial Strategy (CSS) for the period 2008 – 2021. This is due to the recession and ongoing viability issues holding up development of most of the SUEs. The 2016 NNJCS supersedes the 2008 CSS in its entirety.

3.9.12 The 2016 NNJCS notes the likely difficulties that arise with delivering SUEs in relation to lead times and build rates:-

“The ongoing development in North Northamptonshire, including the delivery and implementation of the SUEs will need to be supported by improvements to the physical, social and green and blue infrastructure, which will affect the rate that development can be brought forward. This includes the roads, sewers, utilities, waste management facilities, broadband and public transport services needed for development to work, and the facilities such as schools, libraries, leisure centres, museums, green infrastructure, health and social care infrastructure and open spaces that make sustainable communities.”
3.9.13 The slow delivery of housing at Corby means that the Part 2 Plan submission is timely. However, realigning the Part 2 Plan strategy with the form of rural growth underway in Corby Borough should make more of the opportunity to correspond with these prevailing trends, within the bounds afforded to it in the NNJCS, by taking a positive response to enabling the delivery of further housing across a wider range of local markets, whilst also redressing the lack of five year housing land supply.
4 SITE SUBMISSION

4.1 Land North of Southfield Road, Gretton

4.1.1 The Council are aware of Gladman’s land interest in the plan area, at land at Southfield Road, Gretton. The site has been the subject of an outline application (reference: 18/00271/OUT) for the erection of up to 120 dwellings with public open space, landscaping and sustainable drainage system (SuDS). Whilst that application was recently dismissed (reference: APP/U2805/W/18/3218880), the principle reason for refusal related to the conflict with current policy. Accordingly, this site represents a sustainable option to meet future growth needs.

4.1.2 A site location plan can be found at Appendix 1. The site is well related to the existing built form of the settlement and would represent a logical extension to Gretton. The site is suitable, available and achievable for housing development uses over the plan period and can be considered both deliverable and developable:

- The site is well contained within the landscape and important trees and other landscape features are retained.
- The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact.
- The site can be accessed from Southfield Road, via a simple priority junction;
- The site can positively integrate within and enhance the wider green infrastructure network.
- The site comprises land in agricultural use, but its usefulness for agricultural purposes is limited with 40% of the agricultural land being Subgrade 3a and 60% Subgrade 3b. Its loss would not be significant in national policy terms (Framework 112).
- The site has a low ecological value. Surrounding non-statutory designated sites would remain unaffected by development on the site. The site is of negligible intrinsic conservation value with additional habitats limited to boundary hedgerows. None of the hedgerows present on the site were classified as ‘important’ under the criteria of Hedgerow Regulations 1997, however, where possible, any development would incorporate existing features.
- The site falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding).
• There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to adversely impact the significance of any nearby listed buildings or the Gretton Conservation Area.

• Housing can be delivered without unacceptable wider landscape and visual impacts.

• The site provides a significant opportunity to deliver market and affordable housing.

• The delivery of the site would help support local services and facilities, assisting the long term sustainability of the settlement.
5 CONCLUSIONS

5.1 General Comments

5.1.1 The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination.

5.1.2 Having considered the Publication Draft of the Part 2 Local Plan for Corby, Gladman are concerned about a range of matters and reiterate many of the same points made on the draft version of The Plan. Blanket policies that seek to unduly restrict development opportunities should be avoided and, where possible and/or necessary, policies should include the provisions necessary for flexibility that allow an NPPF-compliant assessment of the benefits and harm that would arise from a development proposal. Such an approach is fully anticipated within the NNJCS, which recognises that development opportunities adjacent to villages can be brought forward through Part 2 Plans in response to opportunities and needs that exist in the area.
APPENDIX 1

Land Southfield Road, Gretton
Appendix 2

Policy HOU5 – Ashford Local Plan (adopted February 2019)

“Proposals for residential development adjoining or close to the existing built up confines of [list settlements] will be acceptable provided that each of the following criteria is met:

a) The scale of development proposed is proportionate in size to the settlement and level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in the Local Plan and committed development in liaison with service providers;

b) The Site is within easy walking distance of basic day to day services in the nearest settlement and/or has access to sustainable methods of transport to access a range of services;

c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area;

d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;

e) Conserves and enhances the natural environment and preserves or enhances any heritage assets in the locality; and

f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:

   i) It sits sympathetically within the wider landscape;

   ii) It preserves or enhances the setting of the nearest settlement;

   iii) It includes an appropriately sized and designed landscape buffer to the open countryside;

   iv) It is consistent with the local character and built form, including scale, bulk and the materials used;

   v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents;

   vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with Policy.”