**Name of the Local Plan to which this representation relates:**

Part 2 Local Plan for Corby Publication Draft (Pre-Submission)

**Part 2 Local Plan for Corby Publication Draft (Pre-Submission)**

**Please return to** LocalPlans.Consultation@corby.gov.uk **By 5pm on Monday 16th September 2019**

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. **Personal Details***

   *If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

<table>
<thead>
<tr>
<th>Title</th>
<th>First Name</th>
<th>Last Name</th>
<th>Job Title (where relevant)</th>
<th>Organisation (where relevant)</th>
<th>Address Line 1</th>
<th>Line 2</th>
<th>Line 3</th>
<th>Line 4</th>
<th>Post Code</th>
<th>Telephone Number</th>
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<td>Tata Steel (UK) Limited</td>
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2. **Agent’s Details (if applicable)**

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<tr>
<th>Title</th>
<th>First Name</th>
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<td>Harris Lamb Property Consultants</td>
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### Part B – Please use a separate sheet for each representation

**Name or Organisation:**

3. To which part of the Local Plan does this representation relate?

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Policy</th>
<th>Policies Map</th>
</tr>
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<tbody>
<tr>
<td>7.7</td>
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4. Do you consider the Local Plan is:

<table>
<thead>
<tr>
<th></th>
<th>(1) Legally compliant</th>
<th>Yes</th>
<th>No</th>
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<td></td>
<td>(2) Sound</td>
<td>Yes</td>
<td>No</td>
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<td></td>
<td>(3) Complies with the Duty to co-operate</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Paragraph 7.7 acknowledges that a 5-year housing land supply is required by the National Planning Policy Framework to be maintained. However, no five calculation has then been provided. When this is considered in the context of two recent appeal decisions (ref. APP/U2805/W/18/3218880 and APP/U2805/W/17/3176172) confirming the Council does not have a 5-year housing land supply, this is a significant omission and we would expect to see a 5-year calculation in Part 2 Plan, along with details of how the Plan looks to address the issues with delivery.

Instead of providing a 5-year housing land supply, the Part 2 Plan directs readers to the trajectory in Appendix 1. The trajectory does not provide a detailed breakdown of the sites that make up the supply and does not provide any detail on the delivery rates to date. Both of these things are essential in order to assess how robust the trajectory is.

In Paragraph 7.7 it states that the trajectory is informed by developers and local agents. Whilst we have no doubt they may have been involved in the process of producing the trajectory, we are also mindful that this was the case in 2008 when the Core Strategy was first envisaged; in the 2016 review of the Core Strategy and in the numerous AMR’s where we have seen huge fluctuations year on year as to the expected / predicted completion rates. What is evident is that:
the larger sites have always failed to deliver at the level predicted; and
there is absolutely no evidence to support the enormous figures of 300dpa
per annum on the larger SUEs. Even with 11 outlets and no competition
from West Corby, Priors Hall has still not reached 300 completions within a
year and the rate they are currently achieving will not be sustained at this
level as the number of outlets will inevitably reduce and vary through time.
An accurate figure would look at average delivery rates and should
acknowledgement how SUEs deliver in practice (i.e. competitions and
outlets fluctuate through time and if a flat rate is being proposed then this
needs to be based on an average, rather than an absolute maximum,
figure).

A realistic trajectory for Priors Hall and Corby West would significantly reduce the
supply by somewhere in the region of 1500 to 2000 dwellings.

The SUEs are not delivering at the rate expected and there is no evidence they
will deliver at the rates predicted (which has been proven time and time again). A
review of the Core Strategy is needed in this regard and a commitment to this
should be included in the Part 2 Plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local
Plan legally compliant and sound, in respect of any legal compliance or soundness
matters you have identified at 5 above. (Please note that non-compliance with
the duty to co-operate is incapable of modification at examination). You will need
to say why each modification will make the Local Plan legally compliant or sound.
It will be helpful if you are able to put forward your suggested revised wording of
any policy or text. Please be as precise as possible.

There is a long history of Council with the input from developers being overly
optimistic about the predicted completion rates of the larger SUEs. This has been
proven time and time again. There is also no hard evidence to support the
delivery at the rates predicted, whether looking at what has been achieved on
SUEs in North Northamptonshire to date or in the context of SUEs further afield.

The trajectories should be adjusted accordingly.

A five-year calculation should be included along with a detailed break-down of all
sites in the supply. Figures should include what they have delivered to date and
what they are predicted to deliver.

Provision should be made in the Part 2 Plan for the immediate review of the Core
Strategy to address the clear issues with delivery.

(Continue on a separate sheet /expand box if necessary)
Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ No, I do not wish to participate in hearing session(s)  ☑ Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To discuss the history of deliver; what this means for the future projections; and the implications this has on the Part 2 Plan to deliver the strategy identified in the NNJCS.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature: [Redacted] Date: 16.9.19