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<p>96 - Kettering Borough Council: Site Specific Part 2 Local Plan - Draft Plan Consultation</p> <p>SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p>	<p>Noted</p>
<p>432 - Site Specific Part 2 Local Plan – Draft Plan Consultation Response</p> <p>Thank you for consulting Churches Together in Kettering & District on the draft plan. This is our response to the consultation.</p> <p>Churches Together in Kettering & District represents churches in the Anglican, Baptist, Catholic, Evangelical, Methodist, Pentecostal, Salvation Army and United Reformed Church traditions.</p> <p>Churches Together is also a member of the Kettering Interfaith Forum and supports its response to this consultation.</p> <p>Local Demand for Christian Places of Worship</p> <p>As I mentioned in the Interfaith Forum response, there has been significant growth in the number of Christian denominations represented in Kettering Borough in recent years. For example, the number of different denominations known to meet locally has increased by eight since 2010; with one other not currently meeting in Kettering, stating that it has sufficient members who are resident here to begin searching for premises. There are likely to be other groups of which we are currently unaware. Many of these churches originated in various parts of south, west and east Africa and their congregations are mostly from BAME communities. With population growth set to continue there is every reason to expect continued growth in the number of different church communities.</p>	<p>Further consideration will be given to how to provide further detail in relation to new community facilities, including places of worship, in the SSP2.</p>

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<p>At present three of these newer churches locally have found premises, two meet in premises owned by other denominations, two in other public buildings and one in each other's homes.</p> <p>Places of Worship and the Local Plan</p> <p>We note</p> <ul style="list-style-type: none"> • The commitment in the Joint Core Strategy and the draft part 2 plan to “providing locally specific policies which focus on issues which are important to local communities”. • The statement in the Joint Core Strategy that meeting spiritual needs has a “vital role in promoting the sustainability of communities and contributing towards their self-reliance”. <p>Conclusion</p> <p>We believe that everyone should have the right to practice their religion. Christianity is communal and requires space to gather. Establishing a church of their own denomination is a priority for new communities locally now, as it has always been. We fully endorse the importance that is given to meeting spiritual needs in the quotation above in the Joint Core Strategy. That is why we also endorse the proposal in the Interfaith Forum's response to include places of worship in the list of non-housing, retail or employment uses in the draft plan, as we know happens in some Local Plans elsewhere. Providing for places of worship has wider community benefits in addition to sustaining communities and promoting self-reliance, by allowing church communities to show their faith in action by service to those in need.</p> <p>Given the importance attached to places of worship by local people, and the context of statements included in The National Planning Policy Framework and existing elements of the Local Plan, we also fully endorse the proposal for specific policy on places of worship in the Local Plan.</p>	
<p>403 - Habitats Regulation Assessment (HRA)</p> <p>We note that there isn't a HRA Report provided with this consultation. We advise that a HRA Report will need to be undertaken. We may therefore need to update or change our advice depending on the</p>	<p>Noted. A Habitat Regulations Assessment and a Sustainability Appraisal will accompany the Pre-submission Plan.</p>

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<p>conclusions of the HRA.</p> <p>Recreational Disturbance: We would advise you that a small section of Kettering Borough is included within 3Km of the Upper Nene Valley Gravel Pits Special Protection Area (SPA). As you will be aware paragraphs 3.40 – 3.42 and policy 4 of the NNJCS, states that all new residential development within 3km of the SPA will result in a significant effect on the SPA due to recreational disturbance impacts. The ‘in-combination’ impact of proposals involving a net increase of one or more dwellings within a 3km radius of the SPA are concluded to have an adverse effect on its integrity unless avoidance and mitigation measures are in place. We note from the draft local plan that there are no allocations within 3Km of the SPA, however, there may be issues outside of the 3km which will require a HRA; for example, water-related impacts and air-pollution impacts.</p> <p>Sustainability Appraisal</p> <p>We note that it is your intention to prepare an updated Sustainability Appraisal to go alongside the Pre-submission version of the local plan. Natural England may therefore need to amend our advice depending on the findings of the Report.</p>	
<p>440 - <u>General Comments</u></p> <p>Some of the proposed allocations are within Flood Zone 2 and would fall under the Environment Agency's Flood Risk Standing Advice. This means we are unlikely to be consulted to consider flood risk issues. The sites should be subject to and have passed the flood risk sequential test to before they are allocated.</p> <p>Your Authority should demonstrate in a clear manner that development proposed on any sites have passed/is likely to pass the sequential and/or exception test. At present, evidence of the sequential test and/or exception test (and sequential approach) appears to be absent and there is no clear narrative as to why sites were either included or excluded on flood risk grounds.</p> <p>In some of the housing policies, it confirms that a FRA will be required. However when a FRA is required the policy wording is not consistent (see comments relating to Sections 8 - 12). The requirement for a FRA and policy wording should be reviewed throughout to ensure it is clear when and why a FRA is</p>	<p>Noted. A background paper will be prepared setting out how the sequential and/ or exception tests have been applied. Policy wording related to flood risk assessment requirements will be reviewed and amended to ensure that a consistent approach is taken. The Council will ensure that the plan is</p>

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<p>required.</p> <p>There should be no increased risk of flooding as a result of development and where possible, new development should seek to reduce flood risk. Accordingly, the policy wording should be amended to reflect this. We suggest – <i>Development will....</i></p> <p>‘Be supported by a site specific Flood Risk Assessment (FRA), which considers all sources of flood risk and demonstrates that there is no increased risk of flooding to the development site and existing surrounding properties, and where possible should seek to reduce flood risk’.</p> <p>Groundwater and land contamination</p> <p>In regard to the protection of controlled waters, the document fails to include any of the following information:</p> <ol style="list-style-type: none"> 1. How sites were screened with regard to land contamination. 2. How the Plan contributes to Outcome 3 of the Joint Core Strategy in terms of Policy 6 – Development of Brownfield Land & land affected by contamination. <p>Water quality and Water resources</p> <p>The sites being considered in the Plan should comply with Policy 10 of the adopted North Northamptonshire Joint Core Strategy 2011-2031.</p> <p>With regard to foul sewerage, a large proportion of the proposed allocated sites are in the catchment of Broadholme Water Recycling Centre, which at the present time, has headroom to accept additional flows.</p> <p>As per Policy 10, the developers will need to work with Anglian Water Services on a site by site basis when planning permission is sought in order to ensure that any required upgrades of the Water Recycling Centre and the sewerage collection system are agreed and are put in place prior to the development</p>	<p>supported by an update to the SFRA.</p> <p>Information relating to how sites were screened in relation to contamination is included in the Housing Allocations Background Paper; the policies in the plan also set out whether any further assessment or mitigation is required.</p>

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<p>taking place.</p> <p>Infrastructure</p> <p>We look forward to maintaining a working partnership with your Authority and other stakeholders to secure the provision of infrastructure within our remit and to ensure that the Part 2 Local Plan for Kettering Borough achieves sustainable development.</p> <p>In summary, the proposed allocations in the Plan should be underpinned by an up to date SFRA. Evidence that the flood risk sequential test has been applied should be included in the Plan. As appropriate, the Plan should be clearly linked to relevant Policies in the adopted Joint Core Strategy for North Northamptonshire.</p> <p>Please do not hesitate to contact me if you have any queries about our response to the Plan. We would be happy to discuss any outstanding issues.</p>	
<p>426 - With regards to land contamination, some of the document talks about assessing land contamination and some about assessment and mitigation i.e. Be supported by a contaminated land investigation and appropriate mitigation scheme to address any identified contamination, ensuring that there are no unacceptable risks to human health. This wording is preferable to the one that does not mention mitigation or protecting human health i.e. Be supported by an assessment to determine the whether the land is contaminated as the majority of brownfield land is contaminated to some extent.</p>	<p>Noted. Wording will be reviewed to ensure a consistent approach.</p>
<p>379 - Kettering Borough Council Consultation - Site Specific Part 2 Local Plan. NCC Public Health response. July 201</p> <p>1 Background and context:</p> <p>1.1 Health and wellbeing challenges</p> <p>There are significant health and wellbeing challenges being faced by us as a nation and at a local level. Whilst we are generally living longer lives, more of our lives are being spent in poor health due to a range</p>	<p>Noted. Background evidence on health and well-being is included in the sustainability appraisal baseline report. The vision and objectives will be reviewed in light of comments made and further consideration will be given to the inclusion</p>

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<p>of factors including lifestyle choices.</p> <p>This longer time spent in poor health is having major impacts on the quality of life of many of our communities as well as placing massive pressures on our healthcare and social welfare support systems. In response to this it is increasingly acknowledged that we need to do more to prevent ill health through supporting positive lifestyle choices that contribute to good health and wellbeing.</p> <p>1.2 Kettering Borough – Health and Wellbeing</p> <p>There are a number of health and wellbeing issues faced by Kettering Borough, including:</p> <ul style="list-style-type: none"> • Approximately 18.5% of the population are smokers. • 2% of 4-5 year olds in the Borough were overweight or obese in 2016/17, rising to 33.4% for 10-11 year olds. • Excess weight in adults - The percentage of adults who are classed as overweight or obese is 70.2% (England average 61.3%) • Hospital stays for alcohol-related harm are significantly worse than the England average. <p>1.3 Health & wellbeing and planning</p> <p>It is widely acknowledged that healthcare and health services are a relatively minor overall influence in our health and wellbeing. In fact, international studies suggest healthcare contributes about 10% to preventing premature deaths, whilst changes in behaviour patterns are estimated to contribute 40%.</p> <p>The NHS 5 Year Forward View recognises this and the need for a radical upgrade in prevention and public health, in order to improve the health of millions of children, achieve financial sustainability for the NHS and maintain the economic prosperity of Britain.</p> <p>Linked to this, it is also widely recognised that land use planning policies and decisions can have a major impact on the health and wellbeing of communities, due to their influence on our living, working and</p>	<p>of a specific health and well-being policy.</p> <p>Support for the inclusion of a policy requiring developments to make provision for older persons housing and for policies TCE6, ENV01 and ENV03 is noted.</p> <p>Further consideration will be given to the need to include specific reference to health and well-being in policy RS04.</p>

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<p>leisure environments and thus on our lifestyle choices and behaviours.</p> <p>The important role of planning in influencing health and wellbeing is acknowledged through a range of initiatives such as:</p> <ul style="list-style-type: none">• Town and Country Planning Association – reuniting health with planning initiative - http://www.tcpa.org.uk/pages/health.html• NHS Healthy New Towns Initiative - https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/ <p>1.4 National Planning Policy Framework (NPPF)</p> <p>Promoting healthy communities is clearly identified in the National Planning Policy Framework. Health and wellbeing is a vital part of sustainable development and achieving sustainable communities.</p> <p>1.5 Northamptonshire’s Joint Health and Wellbeing Strategy & Northamptonshire Sustainability and Transformation Plan.</p> <p>http://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/Pages/health-and-wellbeing-strategy.aspx</p> <p>The ‘<i>Northamptonshire Joint Health and Wellbeing Strategy 2016-2020: Supporting Northamptonshire to Flourish</i>’, explicitly acknowledges the role that planning and the environment can play in influencing health and wellbeing, as well as the importance of supporting communities to make healthy choices. One of the identified priorities is ‘<i>Creating an environment for all people to flourish</i>’. Given the scale of growth planned for the county, planning will play a significant role in delivering this strategy.</p> <p>The Northamptonshire Sustainability & Transformation Plan identifies the need to much more effectively prevent ill health in order to achieve sustainable health and social care systems in the county, as well as</p>	

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<p>providing more healthcare in community settings where it is appropriate to do so.</p> <p>Site Specific Part 2 Local Plan</p> <p>To reflect this health and wellbeing context and the vital role that land use planning plays in influencing the health and wellbeing of our communities, the following comments / recommendations are made:</p> <p>Section 1.12 refers to an evidence base and a series of background papers which support the draft Local Plan. It also provides a link to KBC’s website, although this is a link to the main website page rather than the specific background papers.</p> <p>It is unclear whether there is background evidence on health and wellbeing in Kettering Borough which has been used to inform the Local Plan. If not we suggest that information about the health and wellbeing of Kettering’s population is identified and considered in informing and finalising the Local Plan.</p> <p>Section 1.18 refers to a Sustainability Appraisal process that will be undertaken in relation to the draft plan. As health and wellbeing are such key elements of sustainable development, please ensure that health and wellbeing impacts are addressed within the Sustainability Appraisal process.</p> <p>2.12 Vision</p> <p>We welcome the references to a healthy lifestyle within the Vision statement:</p> <p><i>‘Kettering Borough will be a place where people can enjoy a healthy lifestyle with good access to green infrastructure and open space and where characteristics which make the area special are protected’.</i></p> <p>However, this seems to link the promotion of healthy lifestyles purely or primarily to the provision of green space. While good quality green space can indeed contribute to health and wellbeing, we would welcome a broader approach / reference to healthy lifestyles, identifying the role that planning policy can play through such mechanisms as:</p>	

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<ul style="list-style-type: none">• Influencing physical activity – through supporting active travel, informal and formal leisure activities• Open Spaces, play and recreation opportunities• Providing access to healthy foods and growing spaces• Neighbourhood design and social infrastructure• Built environment (indoor and outdoor) which support health and wellbeing• Supporting economic prosperity for all sections of the community. <p>Our strong preference would be for a specific health and wellbeing policy to be included in the local plan. This could cover three broad areas:</p> <ul style="list-style-type: none">• Design of new development to support and encourage healthy lifestyles and promote wellbeing.• Inclusion of appropriate healthcare infrastructure in new developments• Consideration of health impact assessments for relevant development. <p>Policies should seek to ensure that new development contributes to the health and wellbeing of Kettering residents, including through design which supports and encourages healthy and active lifestyles.</p> <p>2.28 Connectivity</p> <p>With regards to the following sentence:</p> <p><i>‘Locally this will mean ensuring new developments are well connected to settlements and that opportunities to improve pedestrian, cycling and motor transport connectivity are identified.’</i></p> <p>We propose that this should say:</p> <p><i>Locally this will mean ensuring new developments are well connected to settlements and that opportunities to improve pedestrian, cycling and motor transport connectivity are identified <u>and delivered</u>.</i></p>	

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<p>2.31 More Walkable Places and an Excellent Choice of Ways to Travel</p> <p>With regards to the following sentence:</p> <p><i>Locally this will mean identifying development sites in locations which are accessible by a range of sustainable transport modes and ensuring that opportunities to enhance links as a result of development are identified.</i></p> <p>We propose that this should say:</p> <p><i>Locally this will mean identifying development sites in locations which are accessible by a range of sustainable transport modes and ensuring that opportunities to enhance links as a result of development are identified <u>and delivered</u>.</i></p> <p>Active travel infrastructure can contribute to sustainable communities and health and wellbeing in a variety of ways, from improving access to facilities and employment, reducing air and noise pollution and encouraging people to be physically active. Strong planning policies are required to deliver the necessary infrastructure to support and encourage more people to travel actively. We also feel that more explicit reference to air quality should be included.</p> <p>2.38 We would request that this section identifies a wider range of issues that can contribute to health and wellbeing, for example:</p> <ul style="list-style-type: none">• Influencing physical activity – through supporting active travel, informal and formal leisure activities• Open Spaces, play and recreation opportunities• Providing access to healthy foods and growing spaces• Neighbourhood design and social infrastructure• Built environment (indoor and outdoor) which support health and wellbeing• Supporting economic prosperity for all sections of the community.• Air pollution	

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<p>We would also request that Kettering Borough Council consider the role of planning in creating a healthy food environment, including potentially the restriction of unhealthy food businesses in proximity to schools. Based on 2016/17 data, 25.2% of 4-5 year olds in the Borough were overweight or obese, rising to 33.4% for 10-11 year olds. The extensive availability of unhealthy food options can be a contributory factor to this problem.</p> <p>4.9 <i>The JCS confirms that new dwellings must meet the National Space Standards. No additional detail is needed in the SSP2 in relation to this.</i></p> <p>We support this policy approach, based on the contribution that increased internal space within a home can make to health and wellbeing, including:</p> <ul style="list-style-type: none"> • Space to do basic tasks – such as preparing food, cooking and eating together, which can contribute to healthy eating, wellbeing and quality of life. Space to wash clothes and dry them. Space to move freely around a room without being hindered by furniture. • Social interaction – limited space can limit opportunities to socialise. This can make it difficult for people to socialise within their home or even reduce their willingness to invite people into their home. • Children & families – Children need space to play, develop, do their homework and also have privacy. Limited space can be a constraint on their personal development and educational attainment. Early years development and educational attainment is critical for health and wellbeing and a high priority for Public Health in both Northamptonshire and Daventry. • Adults also need space to foster healthy relationships and enable them to care for their families. • Storage: Space to store things such as bikes, toys, equipment and waste. • Overcrowding – limited space can inevitably increase the risk of a home being overcrowded. Studies have linked overcrowding of homes to a range of health problems, including respiratory and infectious diseases, common mental health disorders, accidents around the home and tuberculosis. • Mental wellbeing – all of these factors can influence the mental wellbeing of residents. • Flexibility / adaptability – limited space can mean that a home offers limited flexibility should a household's circumstances or needs change. This could render a home unsuitable for their needs 	

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<p>and thus be detrimental to wellbeing and quality of life. Enhanced space may enable greater opportunity to work from home and thus potentially contribute to economic output.</p> <p>4.22</p> <p>Question 2</p> <p>Do you think that the SSP2 should include a policy which requires developments above a certain threshold to make provision for older persons housing?</p> <p>Yes. Suitable housing can have a major impact on health and wellbeing, as well as enabling people to live independently for longer. Any such policy should be informed by dialogue with NCC Adult Social Care and reference to their understanding of housing needs for older people.</p> <p>Policy TCE6 - Protection of Local Services and Facilities</p> <p>We support this policy which seeks to protect local services and facilities, recognising that such facilities can be crucial for community wellbeing.</p> <p>7.1 Flood risk and Sustainable Water Management</p> <p>We fully support initiatives to effectively manage flood risk, given its significant potential to impact on health and wellbeing. We understand you will liaise with NCC in its Lead Local Flood Authority capacity to inform the specific approach.</p> <p>7.2 / 7.3 Green infrastructure and leisure facilities.</p> <p>We fully support policies which protect and enhance green / open space provision and improved accessibility and quality. We support Policy ENV01 ref Green Infrastructure Corridors. Green spaces and infrastructure can make a significant contribution to health and wellbeing.</p>	

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<p>We support the proposals to undertake further studies and NCC Public Health would welcome the opportunity to contribute to the proposed Open Space, Sports Facilities and Playing Pitch Strategy.</p> <p>Policy ENV03</p> <p>We support this policy to protect Local Green Spaces based on the benefits they can provide to community wellbeing.</p> <p>Policy RS04 – General Development Principles in the Rural Area</p> <p>We request that reference to health and wellbeing be made in the general development principles. For example, Development in the Rural Area will:</p> <p>Seek to promote health and wellbeing through design which supports healthy and active lifestyles.</p> <p>The Public Health team welcomes the opportunity to contribute to the development of the Kettering Site Specific Part 2 Local Plan and would be happy to have further discussions where beneficial.</p>	
<p>467 - General Comments on the Local Plan Approach to New Schools</p> <ol style="list-style-type: none"> 4. The ESFA notes that the North Northamptonshire Joint Core Strategy (JCS; adopted July 2016) sets out the overall growth strategy for Kettering and includes strategic policies (including policy 10 on delivery of infrastructure) and strategic site allocations (including policies 33 and 38 that allocate land for schools at specific sites). The Site Specific Part 2 (SSP2) Local Plan now being consulted on allocates non-strategic sites and sets out more detailed borough-specific policies. 5. The SSP2 document states that <i>“Most of the infrastructure required to deliver growth in Kettering Borough to 2031 is included in the IDP, however site specific infrastructure requirements which are needed to deliver development at a local level will be identified in the SSP2” (para 13.3). Question 6 of the SSP2 asks “Are there any infrastructure requirements which should be included in the SSP2?”</i> 	<p>The Council has worked with NCC Education through the preparation of the SSP2. These discussions will continue as the plan develops to ensure that adequate provision is made for education, particularly in relation to the number of dwellings proposed in Kettering which are in</p>

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<p>6. In this context, and taking into account that Kettering is classified as a Category 5 'Achieving Excellent Area' (due to relatively low scores on educational standards and ability to improve), the ESFA notes that no policies or site allocations in the SSP2 refer to the provision of new schools to support growth and/or boost educational attainment. It would be useful if the council could clarify if an assessment has been completed to forecast what growth at the non-strategic sites allocated in SSP2 (in combination with wider growth) will mean for education capacity, including any consequent need for school expansions or new schools (e.g. in relation to the circa 900 additional homes proposed at Kettering).</p> <p>7. Such an assessment will be important for informing the next version of the North Northamptonshire Infrastructure Delivery Plan (IDP), which is usefully signposted from the infrastructure policy in the JCS (policy 10). Given that the current IDP dates from 2015, the ESFA recommends that this is fully updated, taking into account the infrastructure required to support the non-strategic site allocations, and made available alongside the next version of the SSP2. The ESFA would be particularly interested in responding to any update to the IDP or review of education infrastructure requirements.</p>	<p>excess of the housing requirement included in the Joint Core Strategy. Currently within Kettering Borough all planned new schools are located within SUE's and other sites which have planning permission and therefore at this stage there is no need for the SSP2 to allocate land outside of these strategic allocations for new schools.</p>
<p>Site Allocations</p> <p>8. Ensuring there is an adequate supply of sites for schools is essential and will enable Kettering to swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.</p> <p>9. The next version of the SSP2 should seek to identify specific sites (existing or new) which can deliver the school places needed to support growth, where required, based on the latest evidence of identified need and demand in the updated Infrastructure Delivery Plan. The site allocations or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 20172.</p> <p>10. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility</p>	

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<p>about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The EFSA therefore recommend the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none">- specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that- requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use. <p>11. The local planning authority should note that there are two routes available for establishing a new school. Firstly, where a local authority thinks a new school needs to be established, section 6A of EIA 2006 places the local authority under a duty to seek proposals from new school proposers (academy trusts) to establish an academy (free school) and to specify a date by which proposals must be submitted to the local authority. In this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and pre-/post-opening funding and managing the build process. Secondly, an academy trust can apply directly to the Department for Education during an application round or 'wave' to set up a free school. Note that Wave 13 is currently open for applications. The local authority is less involved in this route but may support groups in pre-opening and/or may provide a site for basic need. For further details please see:</p> <p>https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption</p> <p>Developer Contributions</p> <p>12. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The</p>	

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<p>ESFA note that Northamptonshire County Council's "Creating Sustainable Communities: Planning Obligations Framework and Guidance Document" sets out a clear approach towards securing section 106 planning obligations towards schools. The ESFA support this approach to ensuring developer contributions address the impacts arising from growth.</p> <p>13. Local authorities have sometimes experienced challenges in funding schools via section 106 planning obligations due to the pooling constraints. However, recent proposals consulted on by MHCLG indicate that these may be relaxed in certain specified circumstances. The advantage of using s106 relative to CIL for funding schools is that it is very clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty.</p> <p>Conclusion</p> <p>14. Finally, I hope the above comments are helpful in shaping Kettering's Site Specific Part 2 Local Plan, with specific regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.</p> <p>15. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Kettering borough council to aid in the preparation of a sound Local Plan.</p>	
<p>552 - 1.1 Introduction</p> <p>This representation is made by Gladman Developments Ltd (GDL) in response to the current consultation on the draft version of the Kettering Site Specific Part 2 Local Plan. GDL specialise in the promotion of strategic land for residential development with associated community infrastructure. GDL has considerable experience in the development industry in a number of sectors including residential and employment development. From that experience, it understands the need for the planning system to provide local communities with the homes and jobs that they need to ensure that they have access to a decent home and employment opportunities. GDL has considerable experience in contributing to the Development Plan preparation process, having made representations on numerous local planning</p>	<p>Noted. The Council will ensure the plan meets all the requirements of national policy and guidance.</p>

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<p>documents throughout the UK and having participated in many local plan public examinations. It is on the basis of that experience that the comments are made in this representation.</p> <p>1.2 National Policy</p> <p>The National Planning Policy Framework (the Framework) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:</p> <ul style="list-style-type: none">• Positively Prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base;• Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and• Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>1.3 The White Paper, Autumn Budget and Revised NPPF</p> <p>The Government White Paper ('Fixing our Broken Housing Market') issued in February 2017 is a very clear statement from Government on the importance of the delivery of housing to the wider economy.</p> <p>The Government are in no doubt that the housing market in Britain is broken, which according to the Prime Minister, is one of the greatest barriers to progress in the country today. Average house costs are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right place has slammed the door of the housing market in the face of a whole generation. The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. Everyone involved in politics and the housing industry</p>	

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<p>therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.</p> <p>Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and everwidening gap between the property haves and have nots.</p> <p>The challenge of increasing supply cannot be met by government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.</p> <p>The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.</p> <p>Currently, over 40 percent of local planning authorities do not have a plan that meets the projected growth in households in their area. All local authorities should therefore develop an up-to-date plan with their communities that meets their housing requirement based upon an honest assessment of the need for new homes.</p> <p>Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits. Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities to ensure that the remainder is met.</p> <p>Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every</p>	

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<p>five years. An authority will also need to update their plan if their existing housing target can no longer be justified against their objectively assessed housing requirement.</p> <p>Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.</p> <p>In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people. Finally, the Government have made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.</p> <p>The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of homes in the right places. The Local Plan therefore needs to consider these policy intentions now in order to ensure that it fulfils the Governments agenda and provides the homes that its local community need.</p> <p>Following the election, Sajid Javid re-iterated the Government's intentions for boosting housing growth stating that he wants areas that have benefitted from soaring property prices to play their role in solving the housing crisis. Mr Javid pointed out that where property prices were particularly unaffordable, local leaders would need to take a long hard and honest look to see if they were planning for the right number of homes. More recently, in October 2017, the Prime Minister reaffirmed the Government's commitment to</p>	

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<p>addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:</p> <p>“I will dedicate my premiership to fixing the problem – to restoring hope. To renewing the British Dream for a new generation of people. And that means fixing our broken housing market.” “For 30 or 40 years we simply haven’t built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that’s been a disaster for young people in particular.”</p> <p>Furthermore, in a message to housebuilders, the Prime Minister indicated that:</p> <p>“We, the government, will make sure the land is available. We’ll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs.” The Autumn Budget 2017 brought further details of the Government’s commitment to building a Britain that is ‘fit for the future.’ A prominent feature of this is tackling the housing crisis, with housebuilding featuring prominently amongst the Chancellor’s announcements, which included further confirmation that: “The Government is determined to fix the broken housing market, and restore the dream of home ownership for a new generation. “The affordability of housing for young people is a key challenge for the Government, and whilst it is recognised that there is no ‘single magic bullet’ to solve the housing crisis, the Government is actively seeking to tackle obstacles standing in the way of first time buyers. The Government sees a ‘big step up’ in new house building as an important element in its strategy to address the acute affordability problem and has set a goal to build 300,000 homes a year by the mid-2020s.</p> <p>The vital importance of housing to the economic success of our cities and regions is also highlighted in the Government White Paper “Industrial Strategy: Building a Britain Fit for the Future”, which was published in November 2017. This includes reference to the introduction of planning reforms that will ensure more land is available for housing, and that better use is made of underused land in our cities and towns. It also sets out the challenge to raise housing supply to 300,000 per year before the end of the current parliament. The Government wants to support greater collaboration between councils, a more strategic approach to the planning of housing and infrastructure, more innovative and high quality design in new homes and the creation of the right conditions for new private investment.</p>	

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<p>On 24 July 2018, The Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF, 2018). This publication forms the first revision of the National Planning Policy 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 revised National Planning Policy Framework consultation.</p>	
<p>423 - I would have liked to see more on environmental health issues such as air quality and reducing noise and pollution.</p>	<p>Noted. These issues are covered by Policy 8 of the North Northamptonshire Joint Core Strategy, however further discussions will take place with Environmental Health officers to determine whether further detail needs to be provided in the SSP2 in relation to these issues.</p>
<p>425 - There is also little mention in the document about sustainable forms of travel i.e. green travel planning, electric vehicle charging infrastructure etc.</p>	<p>Noted, Policies 8, 15 and 16 of the JCS cover sustainable transport. Further consideration will be given to how to include reference to electric vehicle charging.</p>
<p>433 - Site Specific Part 2 Local Plan – Draft Plan Consultation Response</p> <p>Thank you for coming to the meeting of the Interfaith Forum to speak about the draft plan. This letter is the Forum’s response to the consultation. The Interfaith Forum has the support of the local Baha’I, Buddhist, Churches Together, Hindu, Jewish, Muslim and Sikh communities and its membership also includes churches, fellowships and individuals.</p>	<p>Noted. Policy 7 of the JCS and proposed Policy TCE6 of the SSP2 provide policy relating to community facilities. Further consideration will be given to how to</p>

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<p data-bbox="188 233 1055 268">The Importance locally of planning for faith communities</p> <p data-bbox="188 309 1682 564">You will have gathered from the faith group representatives at the Forum what an important role places of worship play in the lives of the many people of faith and religious belief in the Borough. As one of the Sikh representatives so eloquently put it at the meeting, places of worship can speak both to the faith communities themselves and to the wider public. They can express in physical form the beliefs of the community and its openness to others. They can provide a focal point for their communities, while enabling their communities to provide wider public services (local examples include soup kitchens and food-bank facilities). Places of worship really do matter to large numbers of local people.</p> <p data-bbox="188 606 1648 750">There is a wide spectrum of religions represented in Kettering and there is no uniformity in the requirements of the premises used as places of worship. For some, all that is needed is a large enough space to accommodate gatherings. Others need dedicated spaces for different aspects of religious practice and for some others every element of a building has significance for the community.</p> <p data-bbox="188 791 1659 1158">As I've mentioned in previous email exchanges with you, the current situation in Kettering mirrors the national picture described by the Faith and Place Network blog on the RTPI website. There has been a significant growth in recent years in the number of Christian denominations represented in the Borough, largely but not exclusively, black majority churches. A number of faith groups have also increased the sizes of their congregations, to the point where they are now, or will shortly be, seeking larger premises. Some, as a temporary measure, are using the premises of other groups or community centres, with the restrictions this imposes on when they can gather and the activities that they can provide. These groups will want their own spaces as soon as the option becomes financially viable. Others meet in each other's homes or travel to places of worship outside the Borough. With population growth in the Borough due to continue, there is every reason to expect demand for new places of worship to increase.</p> <p data-bbox="188 1200 813 1235">The National Planning Policy Framework</p> <p data-bbox="188 1276 1559 1343">As you know, the July 2018 National Planning Policy Framework includes references to places of worship, both explicitly and implicitly. For ease of reference these are:</p>	<p data-bbox="1711 233 2040 414">provide further detail in relation to new community facilities, including places of worship, in the SSP2.</p>

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<ul style="list-style-type: none"> • At paragraph 83 (d) on Supporting a Prosperous Rural Economy: “the retention and development of accessible local services and community facilities, such as...places of worship”. • At paragraph 92 (a) on Promoting Healthy and Safe Communities: “plan positively for the provision and use of shared spaces, community facilities (such as...places of worship) and other local services to enhance the sustainability of communities and residential environments”. • At paragraph 95 (a) on Promoting Public Safety: “anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate” that footnote 41 says includes places of worship • At paragraph 182 on Ground Conditions and Pollution: “Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship...) <p>The most important implicit references are:</p> <ul style="list-style-type: none"> • At paragraph 20 on Strategic Policies *Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for ...community facilities” • At paragraph 28 on Non-Strategic Policies: “This can include allocating sites, the provision of infrastructure and community facilities at a local level” <p>The Joint Core Strategy (JCS)</p> <p>The Joint Core Strategy, strangely and disappointingly given the National Planning Policy Framework lacks any specific references to places of worship, beyond the identification of one new facility in East Northants. Nevertheless it does include references to</p> <ul style="list-style-type: none"> • “ensuring development provides sufficient community services and facilities to meet the needs of the existing and future population.” At paragraph 3.11 on page 13 • “Community services and facilities (sometimes referred to as Community assets) are those that provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. They play a vital role in promoting the sustainability of communities and contributing towards their self-reliance. *in the preamble to Policy 7 at paragraph 3.77 on page 15 	

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<ul style="list-style-type: none"> • “focusing on the issues that matter to local communities” at Outcome 1 on page 26 • “[The Strategy] will help to secure provision of the infrastructure, services and facilities needed to sustain and enhance communities” at Outcome 4 on page 28 • “The Plan identifies the town centres at Kettering and Corby as areas of focus for leisure, retail and cultural facilities” at Outcome 9 on page 31 • “[The Strategy] supports initiatives that build stable, safe, healthy and strong communities, which means respecting cultural diversity and distinctiveness” at Outcome 10 on page 31 • Local authorities should encourage and support viable local initiatives to establish new community projects.” at paragraph 3.82 on page 35 <p>Kettering Town Centre Area Action Plan</p> <p>This Plan acknowledges that “Facilities such as...places of worship provide both tourist attractions for visitors and key services for residents” at paragraph 2.6.1 on page 29</p> <p>Draft Site Specific Part 2 Local Plan</p> <p>At present, the draft SSP2 mentions places of worship in policy TCE6 as among those local services and facilities that are to be protected in town centres and those in the villages are listed as facilities in the section on the rural area.</p> <p>It also, however</p> <ul style="list-style-type: none"> • includes in the SSP2 Draft Vision that in Kettering Borough there will be “good access to services and facilities” (paragraph 2.12) • incorporates the Joint Core Strategy outcome 1 referred to above and states that “Locally this mean providing locally specific policies which focus on issues which are important to local communities.” (paragraph 2.13) • covers other non-housing, retail or employment uses, noting that “It is important to ensure that additional open space, space, sport and recreation facilities are provided to meet the needs of existing communities where there is evidence of shortfalls in provision and to meet the increasing 	

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<p>needs of a growing population.” (paragraph 7.18)</p> <p>Proposals for inclusion in the SSP2</p> <p>There is already a commitment in the draft to “focus on issues which are important to local communities”. Places of worship are indisputably of great importance to our local faith communities, accounting for a significant proportion of local residents. Taking into account the National Planning Policy Framework, existing elements of the Local Plan and other parts of the draft SSP2, it is suggested that</p> <ul style="list-style-type: none"> • the sections relating to JCS outcomes 1, 4 and 9 are expanded to include meeting local needs for places of worship, with a reference to the new proposed policy below • paragraph 7.18 makes explicit reference to places of worship among the list of facilities to be provided to meet existing and future needs • there is a new policy in the Natural Environment and Heritage section that states that, “Proposals for new Places of Worship and associated community facilities will be supported provided that such development would not have any significant adverse effect on residential amenity” (see, for example, the Local Plan for Croydon that includes this policy). <p>I will be happy to answer any queries you have on this submission.</p> <p>I appreciate that understanding places of worship and their significance to local communities can be difficult and I know that our faith communities would be happy for you and your colleagues in Development Services to visit them if this would help with your consideration of our response to the consultation.</p>	
<p>545 - Northamptonshire County Council’s Development Management Team welcomes the opportunity to comment on the draft Kettering Borough Site Specific Part 2 Local Plan (the draft SSP2) through the current consultation, supporting the development of planning policy at the local level.</p> <p>The County Council Plan for 2016-2021 sets out the vision of ‘Making Northamptonshire a great place to live and work’. Northamptonshire is the largest single growth area in England outside London, with a</p>	<p>Noted. The Council has worked with NCC during the preparation of the SSP2 and will continue to do so as the document progresses. There are currently no allocations</p>

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<p>population of more than 700,000 and set to grow by 20% by 2025.</p> <p>Education Infrastructure and Facilities</p> <ol style="list-style-type: none"> 1. As the Local Education Authority for the county of Northamptonshire, the County Council has a statutory responsibility for ensuring the sufficiency of provision for all pupils of school age across Early Years, Primary, Secondary and Sixth-form Education. 2. It is the County Council's role to plan, commission and organise school places in a way that promotes the raising of standards, manages supply and demand, and creates a diverse infrastructure. The County Council's 'School Organisation Plan 2016-2021 – Local Places for Local Children' (SOP) provides the framework for meeting these objectives, providing accommodation for school places that is high quality, fit for purpose, provides value for money and ensures flexibility to respond to changes in need. 3. New housing development creates additional demand for existing and new education provision. Across Northamptonshire 80,000 additional new homes are expected to be built by 2031. These are likely to lead to approximately 24,000 additional Primary aged pupils and 16,000 Secondary and Sixth Form pupils. 4. Since 2010, the County Council has invested over £230m in the schools estate in Northamptonshire; its Capital Strategy 2016-2021 identifies a further £400m of investment that is required to meet the anticipated demand for school places in the county and ensure that the County Council continues to meet its statutory obligations. 5. The County Council welcomes the opportunity to comment on the draft SSP2, and positively supports the need for collaboration between local authorities and other partner organisations, to ensure that the Duty to Co-operate obligation is met. <p>General Comments on the draft Site Specific Part 2 Approach to Education</p> <ol style="list-style-type: none"> 6. The County Council acknowledges the Draft Vision set out in the draft SSP2 and welcomes the 	<p>for education within the plan. Planned new schools are located within SUE's and sites which have planning permission, therefore at this stage there is no need for the SSP2 to make allocations in relation to these proposed schools. If further need for schools is identified the Council would be happy to work with NCC to identify suitable locations.</p>

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<p>emphasis on ensuring that the Borough provides good access to services and facilities.</p> <p>7. It is the role of the SSP2 to identify site allocations for housing, employment, recreation and other uses; it is noted however that there are currently no specific policies or site allocations included within the draft SSP2 relating to Education infrastructure, as required to support the demands of growth resulting from new housing development.</p> <p>8. This is a significant concern for the County Council and it is therefore proposed that the next version of the draft SSP2 positively establishes the requirement for delivery of supporting infrastructure, such as Education infrastructure, necessary to meet the aims of the Vision.</p> <p>9. This should be supported through the identification in the SSP2 of specific site allocations for new and expanded schools and education facilities, and any other supporting infrastructure as may be appropriate. This should be closely aligned to the schemes identified through the North Northamptonshire Infrastructure Delivery Plan (IDP).</p> <p>10. The Plan clearly establishes the national and local policy context in which it will operate; in particular the need for Local Plans to be positively prepared, to meet the tests of the National Planning Policy Framework and to align with other local plans and policies.</p>	
<p>Specific Comments on the draft Site Specific Part 2</p> <p>11. The below forms specific comments on selected policies in response to the current draft SSP2 consultation. These comments are made specifically in relation to the provision of education facilities and infrastructure on behalf of the County Council, which will be necessary to ensure sustainable development principles are adhered to, and to meet the needs of planned for growth.</p> <p>12. The County Council recognises that maintaining a sufficient land supply is critical to fulfilling obligations under national planning policy, and therefore notes that additional sites have been identified during the delivery period of the draft SSP2 to ensure that long-term development can be planned for in the most sustainable locations.</p> <p>13. The County Council would welcome the opportunity to be engaged in all potential future site</p>	

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<p>allocation discussions as early as possible, to consider the potential impact on local education infrastructure and examine how this translates to the need for additional education provision. This is equally important for small and large / strategic sites across both rural and urban areas and will help to provide clarity to developers, schools and local communities.</p>	
<p>551 –</p> <p>30. In addition to the housing allocations proposed in the draft SSP2, the County Council will continue to monitor capacity and pupil generation forecasts across the existing schools estate, and assess the ability of these facilities to adapt, expand and/or enhance existing provision where possible to mitigate the impact of development. Future versions of the draft SSP2 should reflect the County Council's strategic priorities for ensuring sufficiency of pupil places as a standard consideration in the assessment and determination of planning applications and in the securing of developer contributions, including through Community Infrastructure Levy (where applicable) and Section 106.</p> <p>31. The County Council remains committed to working closely with all interested parties, to ensure that capacity across these areas can be monitored and delivered, in order to meet the statutory obligations of the County Council to provide sufficiency of school places.</p> <p>Developer Contributions – CIL and S106</p> <p>32. The national implementation of the Community Infrastructure Levy regulations (CIL) in April 2015 has fundamentally altered the way in which developer contributions are secured across the country. The County Council's own 'Creating Sustainable Communities: Planning Obligations Framework and Guidance – January 2015' document (and any subsequent update) sets out the adopted approach of the County Council to requesting and securing Section 106 obligations in respect of Education infrastructure (amongst other areas).</p> <p>33. It is recommended that Kettering Borough Council continue to work closely with the County Council to ensure continued awareness of the latest available evidence base, including updates to the County Council's pupil forecasting methodology, to ensure that there is sufficient clarity on the</p>	<p>Noted. The Council will continue to work with NCC throughout the preparation of the SSP2 to ensure that needs for education provision are adequately addressed.</p>

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<p>approach to securing developer contributions, including the relationship between Section 106 and CIL in supporting delivery of education infrastructure, signposting to the County Council's adopted policy where appropriate.</p> <p>34. In addition, NCC proposes that Kettering Borough Council consider the inclusion – either within future iterations of the draft SSP2 or as a separate Supplemental Planning Document – a policy that positively establishes the requirement for developer contributions (eg Section 106) to ensure that the impact of additional development can be effectively mitigated through supporting delivery of additional infrastructure where appropriate.</p>	
<p>Concluding comments</p> <p>35. The County Council welcomes the development of the draft Site Specific Plan Part 2 and remains committed to working with Kettering Borough Council and other partners in relation to the sustainable delivery of schools provision, including: the Education, Funding and Skills Agency, Free Schools, Academy Trusts, existing schools, education providers, developers and local communities</p> <p>36. The County Council remains committed to supporting the shaping of new policy to help shape and support the development and implementation of planning policy. The County Council therefore welcomes opportunities to engage with KBC to discuss these matters, and to guide the planning and development of new education facilities and infrastructure to meet the needs of proposed growth.</p> <p>37. This should at all stages be underpinned by the County Council's own School Organisation Plan, evidence base and strategic priorities, and informed by the '<i>Planning for Schools Development (2011)</i>' joint policy document as prepared by the Secretary of State for Education and Secretary of State for Communities and Local Government, which sets out the Government's commitments to planning and delivery of state-funded schools.</p> <p>38. Continued engagement is welcomed with KBC, particularly as the draft SSP2 is progressed and as the County Council's adopted Planning Obligations Framework and Guidance (2015) document is</p>	

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<p>updated. This will ensure that current priorities and policies of the County Council and KBC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 to effectively mitigate the impact of development.</p> <p>39. This collaborative approach will help to ensure that appropriate infrastructure is provided which will meet the demands of anticipated growth, creating new and expanded schools which will serve local children and be a focus for communities for the future.</p> <p>40. I hope that the above comments are helpful in shaping Kettering Borough Council's Draft Site Specific Plan Part 2; please do not hesitate to contact me should you have any queries regarding this response.</p>	