

Appendix 2b - Introduction

Comment	KBC Response
<p>Id 7 - I could not find any reference about good design which is a fundamental requirement of our built environment and can only be carried out by architects (as in ARB registered) and chartered engineers and chartered town planners. All are professions that are under represented in the Borough because they are under used. No other persons are qualified specifically to provide good quality building architecture.</p>	<p>The SSP2 needs to be read alongside the NPPF and JCS which cover design issues; the SSP2 shouldn't repeat existing policy. A larger number of policies in the plan deal with detailed design matters, e.g. Policy RS04 and site allocation policies which include development principles. A Place Shaping SPD is also being prepared which will provide further detail on design.</p>
<p>Id 49 – Objection to consultation point 1 - Introduction</p>	<p>Noted</p>
<p>Id 267 - We regret that policy on the allocation of gypsy and travellers sites has been excluded from this document. We are aware of the difficulty KBC has had in resolving this issue, and that deferring consideration is politically expedient. But as a matter of principle the allocation of land for this purpose should be treated as part of land allocation as a whole and not as an afterthought or special issue.</p>	<p>Comments noted, however it has been agreed that a separate Gypsy and Traveller allocations policy be prepared to enable the SSP2 to progress while the Gypsy and Traveller Accommodation Assessment is updated.</p>
<p>Id 282 - Paragraphs 1.16 to 1.18 refers to the Sustainability Appraisal for Draft SSKLP. It is noted that no Sustainability Appraisal document has been published with Draft SSKLP. It is anticipated that an Interim Sustainability Appraisal of Draft SSKLP will be prepared to inform the Pre-submission document. At this stage, and in the absence of a Sustainability Appraisal for Draft SSKLP, the potential outcome of the assessment process against the sustainability-related objectives relevant to these representations are identified.</p> <p>A key aim of the Sustainability Appraisal process is to make a plan more sustainable. It tests the social, economic and environmental impacts of various plan options, to help choose the most sustainable option. It also seeks to determine the extent to which the principles of sustainable development are integrated into the plan and its policies.</p>	<p>Noted. The consultation on the draft plan was an informal stage in the preparation of the plan. SA has been undertaken alongside the preparation of the plan as set out in paragraphs 1.16-1.18. The final SA report will be consulted on alongside the Pre-submission plan. Sites have been assessed against the SA criteria; these include criteria relating to housing. The delivery of sites is being</p>

Appendix 2b - Introduction

Comment	KBC Response
<p>It is noted that the adopted Joint Core Strategy (JCS) Outcome 10: Enhanced Quality of Life for All Residents aims to meet housing and affordable housing needs. Therefore, the Sustainability Appraisal will need to include housing-related sustainability objectives, which will be used to assess the sustainability credentials of the policies and allocations in Draft SSKLP. It is anticipated that the housing-related sustainability objectives will be particularly relevant to policies related to the housing requirement, delivery of affordable housing, and the larger sites and allocations that are expected to make a significant contribution to the housing land supply (e.g. Kettering East, Desborough North, and Rothwell North). If those policies do not achieve positive scores when assessed against the housing-related sustainability objectives then other more sustainable policy options should be considered. It is likely that housing delivery and the delivery of affordable housing will be particular challenges for the housing-related sustainability objectives. As set out in these representations, there are particular concerns with housing delivery at Kettering East, Desborough North, and Rothwell North, and the fact that only 20% affordable housing will be delivered at Desborough North and Rothwell North. In contrast, Burton Latimer has historically delivered against housing targets and developments in this location typically meet the 30% affordable housing requirement for market towns.</p>	<p>monitored, progress of sites overall is not considered to be a concern. Affordable housing delivery is also being maintained.</p>
<p>Id 234 - Comments made on behalf of Desborough Town Council</p> <p>Why is this being pushed through now when Borough Council will disappear PLUS it is based on consultations started in 2009 so by 2109 adoption it will be 10years out of date?</p>	<p>It is important that work on the SSP2 continues, this plan once adopted will cover the period until 2031, and will therefore continue after any change in local government structures takes place. Work on the SSP2 began in 2009 but the evidence base and consultation has continued to be updated during this time and therefore is not out of date.</p>
<p>Id 480 - Context of the Site Specific Part 2 Local Plan Kettering Borough Council explain the context for the Site Specific Part 2 Local Plan (SSP2) within the 'Introduction' (pages 4-8). It is explained at paragraphs 1.4 and 1.5 that the North</p>	<p>Noted. The SSP2 is a part 2 local plan and will not consider issues which have been addressed through</p>

Appendix 2b - Introduction

Comment	KBC Response
<p>Northamptonshire Joint Core Strategy (2016) (JCS) forms the Part 1 of the Local Plan and it is intended that the SSP2 will "...will allocate non-strategic sites to meet requirements within the JCS and will provide more detailed local policies for Kettering Borough. The SSP2 does not need to replicate policies included in the JCS but will provide more local detail specific to Kettering Borough." Consequentially, paragraph 1.5 confirms that the plan period is 2011-2031, the same as the North Northamptonshire JCS.</p> <p>The Council's Local Development Scheme (April 2018) and Table 1.1 of the SSP2 identifies that Kettering Borough Council intends to hold a 'Pre-submission Consultation' during October to December 2018, and subsequently submit the SSP2 for Examination in March 2019.</p> <p>It is noted within Annex 1 'Implementation' of the recently published National Planning Policy Framework (2018) that "...Plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.</p> <p><i>213. However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).</i></p> <p><i>214. The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019...." (paragraphs 212 to 214).</i></p> <p>As a consequence of the critical timings identified within paragraph 214 of the Revised NPPF 2018, Kettering Borough Council should take into account the provisions of the Revised NPPF in the preparation of the SSP2. This is acknowledged at paragraph 1.9 of SSP2. Support is given to the final sentence which states "The plan will be updated, where appropriate, prior to the Pre-submission Consultation".</p> <p>Recommendation: It is recommended that Kettering Borough Council give due consideration to the amount of planned development across the Borough notwithstanding the provisions</p>	<p>the Part 1 Local Plan. Any review of the amount of planned development will take place through a review of the JCS not the SSP2.</p>

Appendix 2b - Introduction

Comment	KBC Response
<p>within the JCS (2016).</p> <p><u>Duty to Cooperate</u></p> <p>There is a legal requirement to comply with the ‘Duty to Cooperate’ in the preparation of Local Plans. Support is given to the statement at paragraph 1.1.5 that <i>“The Council works closely with other local authorities and partners in the North Northamptonshire area through the existing joint working arrangements. This has included the preparation of the JCS which sets out the strategic priorities for the area, and through the preparation of a joint evidence base and studies on a wide range of topics.... The Council has continued to engage with neighbouring authorities and other bodies through the preparation of the SSP2 to ensure that any cross boundary issues are addressed through its preparation.”</i></p> <p>Recommendation: The Council should continue to engage with neighbouring authorities and documentation to justify compliance with the Duty to Cooperate</p>	
<p>Id 553 - 1.4 Sustainability Appraisal</p> <p>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.</p> <p>Critically, the current NPPF 2018 at Paragraph 32 sets out that:</p> <p>“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant</p>	<p>The consultation on the draft plan was an informal stage in the preparation of the plan. SA has been undertaken alongside the preparation of the plan as set out in paragraphs 1.16-1.18. The final SA report will be consulted on alongside the Pre-submission plan. Sites have been assessed against the SA criteria and discounted on this basis. The scope of the SA will reflect the scope of the document and will not cover issues which have been assessed through the preparation of the JCS (Part 1 Plan).</p>

Appendix 2b - Introduction

Comment	KBC Response
<p>adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."</p> <p>Following this the Planning Practice Guidance (PPG) requires that different realistic and deliverable options for policies within the Plan are tested, setting out:</p> <p>“they must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made”</p> <p>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:</p> <ol style="list-style-type: none">1. Reasonable alternatives on the quantum of development (i.e. the housing requirement); <p>and,</p> <ol style="list-style-type: none">2. Reasonable alternatives on the distribution of development (i.e. the spatial strategy and combination of site allocations to be made). <p>The Kettering SSP2 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.</p> <p>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.</p> <p>Gladman would 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</p>	

Appendix 2b - Introduction

Comment	KBC Response
<p>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 PPG states</p> <p>“the Sustainability Appraisal should outline the reasons why the alternatives were selected, the reasons why the rejected options were not 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.”</p>	
<p>Id 250 - Comments made on behalf of Desborough Town Council</p> <p>Timing - document states that it is an early stage development of the consultation on the SSP2 but looking at the ‘process and timetable’ it has the date for adoption of Dec 19 with submission to the Secretary of State of March 19, so the ‘Regulation 19’ consultation will be Oct 19 to Dec 19 which gives hardly any time for anyone at KBC to make any changes.</p> <p>Why is this being done anyway if Unitary Authorities are coming into being in 2020 and the Borough will disappear. Does that mean the whole plan will be reviewed by the new Unitary?</p>	<p>The Borough Council will consider all responses to the consultation. It is important that work on the SSP2 continues, this plan once adopted will cover the period until 2031, and will therefore continue after any change in local government structures takes place.</p>