

Appendix 2a – Kettering and Barton Seagrave

Comment No.	KBC Response
<p>6. Policy KET01 Defined Housing Areas What was the criteria for choosing those three parts of the town and why were similar areas in terms of age and content such as Paradise Lane / Spinney Lane / Paradise Avenue excluded?</p>	<p>The areas designated as Defined Housing Areas were taken from the 1995 Local Plan. If it is felt that further areas should be designated under this policy, further information to justify the inclusion of these areas is required. Ahead of the pre-submission consultation, a background paper will be prepared, in which it will set out the background evidence for designating defined housing areas, and whether it is considered appropriate to make additions to those already designated.</p>
<p>101. Policy KET05 Former Kettering Town Football Club, Rockingham Road This site has been the subject of discussion with Sport England and the submission of an impact statement regarding the loss of the playing field area. Sport England advised that we would not object to the loss subject to a mitigation package being agreed for improvements to North Park - Sport England therefore objects to this allocation until such time as the matter is resolved.</p>	<p>The requirement to provide off site mitigation measures through improvements to North Park will be added as a development principle within Policy KET05. Further discussions with Sport England are required to determine whether this would be required as part of this policy.</p>
<p>134. Policy KET01 Defined Housing Areas In principle we strongly agree that Headlands (south of Glebe Avenue) should have its residential integrity protected. We wish to have the wording strengthened to prevent curtilages being divided prior to application to develop. A recent example was where a house was sold without its garden. The garden was then established as a property and planning permission sought (Reference the Crossways garden development on the corner of Hawthorn Road and Headlands) This will require careful wording to ensure the spirit of the Policy is fully followed. Map 8.2 becomes an important reference document as the baseline for curtilages and must be</p>	<p>Alterations to policy will be considered, although at present Policy KET01 does prevent the sub-division of curtilages and the ability for planning policies to control the sale and subdivision of garden land to third parties is limited.</p> <p>It appears that the garden on 62</p>

Appendix 2a – Kettering and Barton Seagrave

<p>an accurate reflection of them.</p> <p>We also consider the wording should be strengthened to include change of use as these changes fundamentally change the residential character the policy is designed to protect.</p> <p>We also question why the garden of 62 Headlands is only partially shaded. We believe that it should be fully shaded.</p> <p>With these modifications, we consider that this policy will be justified by seeking to reinforce the distinctive character of this area and consistent with paragraph 60 of the National Planning Policy Framework, which states that it is proper for planning policies and decisions to seek to promote and reinforce local distinctiveness.</p>	<p>Headlands is only partially included, this will be reviewed and it is likely that the entirety of the garden will be included.</p>
<p>135. Policy KET02 Protected Housing Areas</p> <p>We strongly support the protection of the residential nature of Queensberry Road, The Crescent and The Drive.</p> <p>We would ask that the boundary be extended to cover 44 to 50 Headlands. This specifically excludes 42 Headlands which is in business use already</p>	<p>A review of the Protected Housing Areas will be undertaken to ensure that all suitable properties in this area benefit from this designation. Your specific comment in relation to 44 to 50 Headlands will be taken into account as part of this review. This will therefore ensure that Policy KET02 accurately reflects the nature and character of the built environment of this part of the Headlands at present and takes into account any changes in the area since the original designation in the Local Plan (1995).</p>
<p>136. Policy KET06 Kettering Fire Station, Headlands</p> <p>We require clarification of the boundary/size of site. We would point out that there is a freehold property in the North East corner of the site which appears to be included in the potential development site. We would request that a detailed map be drawn up to show the proposed</p>	<p>The property at 3 Lonsdale Road should not be included within the allocated housing site area and therefore will be removed and this will</p>

Appendix 2a – Kettering and Barton Seagrave

development site and specifically show the freehold as excluded.

We question the feasibility of the site being available. The Fire Service require new premises to move to. The relocation of the Fire Station has been mooted for decades but has still not happened. Paragraph 47 of the National Planning Policy Framework requires Council's to identify specific deliverable and developable sites for housing to boost supply. However, whilst the Fire Station is one such site identified by the Council for housing, we have seen no evidence that funding is being allocated within the Local Plan period to build a replacement Fire Station in another location. For these reasons, the relocation of the Fire Station would appear speculative and we do not consider the proposed Fire Station allocation to be a deliverable or developable site within the meanings set out in Footnotes 11 and 12 of the National Planning Policy Framework.

We would want the criteria in the Policy to specifically refer to any Character Assessment produced in the forthcoming Neighbourhood Plan.

In Policy KET01 the special character of the residential area surrounding the Fire Station is defined and rightly considered worthy of promotion and reinforcement, and there should be a cross reference to KET01 in KET06, requiring development of the fire station to respond to this character. We believe this would limit the density of future development to below 17 to fit with the Fire Station surroundings.

In Paragraph 7.2 of the Local Plan you refer specifically to importance of Green Infrastructure. The section of the Fire Station site that borders Lonsdale Road has a stand of mature Silver Beech trees. They are contiguous with private trees and jointly form an important part of the fabric of the area. We would want specific reference to the setting of these trees in the Policy.

be reflected in any map produced to show the extent of the site.

The Fire Station site is considered an allocation that is likely to come forward in the longer term towards the end of the plan period up to 2031, given that development of the site is dependent on the relocation of the fire station to an alternative location. There are no plans at present for it to relocate in the short term.

As the South West Kettering (Headlands Community) Neighbourhood Forum Plan is yet to reach a stage where there is certainty of its adoption and be given significant weight, the SSP2 sets out the planning policies for the borough as a whole and Kettering more specifically.

When it is considered that the Neighbourhood Plan has reached a stage where there is certainty of its adoption, a policy that may look to designate the site as a housing allocation can use the Character Assessment to inform a site specific policy for the site.

Appendix 2a – Kettering and Barton Seagrave

	<p>Policy KET06 for the site sets out development principles to shape any future development of the site; it is considered that the policy is sufficient at present; however your comments regarding a cross-reference with Policy KET01 will be taken into account. The density of any development should reflect and be sympathetic to the character of the area and therefore with this in mind Policy KET01 and KET06 will be reviewed. This will also take into account the Silver Beech trees you refer to in your comment.</p>
<p>139. Policy KET01 Defined Housing Areas In principle we strongly agree that Headlands (south of Glebe Avenue) should have its residential integrity protected. We wish to have the wording strengthened to prevent curtilages being divided prior to application to develop. A recent example was where a house was sold without its garden. The garden was then established as a property and planning permission sought (Reference the Crossways garden development on the corner of Hawthorn Road and Headlands) This will require careful wording to ensure the spirit of the Policy is fully followed. Map 8.2 becomes an important reference document as the baseline for curtilages and must be an accurate reflection of them.</p> <p>We also consider the wording should be strengthened to include change of use as these changes fundamentally change the residential character the policy is designed to protect. The change to say business use would change the feel of the area</p> <p>We also question why the garden of 62 Headlands is only partially shaded. We believe that it</p>	<p>Alterations to policy will be considered. It appears that the garden on 62 Headlands is only partially included, this will be reviewed and it is likely that the entirety of the garden will be included.</p>

Appendix 2a – Kettering and Barton Seagrave

<p>should be fully shaded.</p>	
<p>140. Policy KET02 Protected Housing Areas We strongly support the protection of the residential nature of Queensberry Road, The Crescent and The Drive.</p> <p>We would ask that the boundary be extended to cover 44 to 50 Headlands. They form a coherent block of residencies and changing any one of them would detract. This specifically excludes 42 Headlands which is in business use already.</p>	<p>A review of the Protected Housing Areas will be undertaken to ensure that all suitable properties in this area benefit from this designation. Your specific comment in relation to 44 to 50 Headlands will be taken into account as part of this review. This will therefore ensure that Policy KET02 accurately reflects the nature and character of the built environment of this part of the Headlands at present and takes into account any changes in the area since the original designation in the Local Plan (1995).</p>
<p>141. Policy KET06 Kettering Fire Station, Headlands Firstly we would point out that the way the boundary appears in the document it includes a private property We want clarification of the boundary/size of site. A detailed map is required to prevent any confusion</p> <p>We question whether the site being available. The Fire Service require new premises to move to. The relocation of the Fire Station has been mooted for decades but has still not happened.</p> <p>In Policy KET01 the special character of the residential area surrounding the Fire Station is defined and rightly considered worthy of promotion and reinforcement, and there should be a cross reference to KET01 in KET06, requiring development of the fire station to respond to this character. We believe this would limit the density of future development to below 17 to fit with the Fire Station surroundings. Therefore any Policy needs to have a lower density figure included.</p>	<p>The property at 3 Lonsdale Road should not be included within the allocated housing site area and therefore will be removed and this will be reflected in any map produced to show the extent of the site.</p> <p>The Fire Station site is considered an allocation that is likely to come forward in the longer term towards the end of the plan period up to 2031, given that development of the site is dependent on the relocation of the fire station to an alternative location. There are no plans at present for it to relocate in the</p>

Appendix 2a – Kettering and Barton Seagrave

<p>In Paragraph 7.2 of the Local Plan you refer specifically to importance of Green Infrastructure. The section of the Fire Station site that borders Lonsdale Road has a stand of mature Silver Beech trees. They are contiguous with private trees and jointly form an important part of the fabric of the area. We would want specific reference to the setting of these trees in the Policy.</p>	<p>short term.</p> <p>Policy KET06 for the site sets out development principles to shape any future development of the site; it is considered that the policy is sufficient at present; however your comments regarding a cross-reference with Policy KET01 will be taken into account. The density of any development should reflect and be sympathetic to the character of the area and therefore with this in mind Policy KET01 and KET06 will be reviewed. This will also take into account the Silver Beech trees you refer to in your comment.</p>
<p>308. Policy KET08 Glendon Ironworks, Sackville Street Development could involve the enhancement of the surviving industrial buildings. No heritage assessment included in the proposals.</p>	<p>A criterion will be included within the development principles requiring a heritage assessment for this site. The inclusion of a criterion that would encourage the enhancement of the existing buildings on the site could be included and will be considered as part of a policy in the Pre-submission plan. The impact of this on viability and the feasibility of doing this will need to be taken into account.</p>
<p>309. Policy KET10 Factory adjacent to 52 Lawson Street This is the former Whitfield and Wylie Shoe Factory I have previously advised that development should include the enhancement of surviving building. There is no provision for a heritage</p>	<p>A criterion could be included within the development principles to require a heritage assessment for this site.</p>

Appendix 2a – Kettering and Barton Seagrave

<p>impact assessment or retention of the building within the proposals.</p>	<p>(Responding to surviving buildings). The inclusion of a criterion that would encourage the enhancement of the existing buildings on the site could be included and will be considered as part of a policy in the Pre-submission plan. The impact of this on viability and feasibility of doing this will need to be taken into account.</p>
<p>392. Policy KET06 Kettering Fire Station, Headlands My **** ***** and I have held the freehold of our house – the former Chief Fire Officer’s house – that is “Braidwood”, ****, Kettering since June 1977. This house and garden are situated to the South and East end of Lonsdale Road and are bounded to the east by the playing fields of Bishop Stopford C of E Academy and to the South and West by the current Fire Station.</p> <p>Our front garden is open-plan and merges into the grassed area to the North of the Fire Station. We visited the public consultation for this Local Plan on Tuesday 17/07/18 and our comments are based on what we saw of the maps etc. on display. Forgive us if we do not have all of the relevant paragraph and map numbers to hand. However, our comments are based on points which we raised with members of staff at that time.</p> <p>Firstly, we are very dubious that the Fire Station site will become available during the forward period covered by this Local Plan. There has been talk of the Fire Station relocating for at least 20 years; but this has never come to anything and with the current financial situation for Local Authorities, it seems less likely than ever.</p> <p>We noticed on the map that the area designated (as we understood it) for residential integrity, was shaded in green. This included No.1 and No.2 on the North side of Lonsdale Road, but not our house at No. 3 on the South side. We would have thought that our property should have</p>	<p>The Fire Station site is considered an allocation that is likely to come forward in the longer term towards the end of the plan period up to 2031, given that development of the site is dependent on the relocation of the fire station to an alternative location. There are no plans at present to relocate the fire station in the short term.</p> <p>A review of the Designated Housing Area will be undertaken to ensure that properties that would benefit from designation under this policy are included. Your specific comment in relation to 3 Lonsdale Road will be taken into account as part of this review. This will therefore ensure that Policy KET01 accurately reflects the nature and character of the built environment of this part of Headlands</p>

Appendix 2a – Kettering and Barton Seagrave

<p>been incorporated into the “designated area”.</p> <p>To continue from that comment, as it stands our house and garden seem to be absorbed into the potential development site for the suggested 17 dwellings on the current fire station land, should it be vacated. We think there should be a properly drawn up map of the proposed development site, which makes it clear our house and garden is not included in it.</p> <p>We also note that Policy KET01 referred to the “special nature” of the residential area surrounding the Fire Station. Would it not be advisable for Policy KET06 to be properly cross-referenced to Policy KET01? This is surely relevant to the number and type of dwellings which might be allowed on the Fire Station site.</p> <p>Could we also touch further upon paragraph 7.2 of the Local Plan? This highlights the importance of Green Infrastructure. As such it ties in with my earlier comment at paragraph 1.2 above. At present there is a pleasant green area along the whole southern side of Lonsdale Road. This consists of our open-plan grassed front garden; which includes a mature Silver Birch tree and merges with the grassed Fire Station land on which stand some 7 mature trees, including Silver Birch, Flowering Cherry etc. – some of which are commemorative in nature, with associated plaques. We feel that the Policy document should take special regard of this green space, as it is an unusual asset in the Headlands area.</p>	<p>at present and takes into account any changes in the area since the original designation in the Local Plan (1995).</p> <p>The property at 3 Lonsdale Road should not be included within the allocated housing site area and therefore will be removed, and this will be reflected in any map produced to show the extent of the site.</p> <p>The content of Policy KET01 and KET06 will be reviewed to determine whether they need to be explicitly cross referenced to ensure consistency. In addition to this, Policy KET06 will be reviewed in light on your comments regarding the green space adjacent to the site.</p>
<p>397. Policy KET13 McAlpine’s Yard, Pytchley Lodge Road KE/184a: Please see comments above relating to Question 4.</p>	<p>Noted</p>
<p>400. Policy KET04 Land adjacent A14 opposite Crematorium KE/002: Permission already granted.</p>	<p>Noted</p>
<p>410. Chapter 8 Kettering and Barton Seagrave Will a site specific policy be included building upon JCS policy 36? I would be happy to advise on wording, providing greater detail in relation to the nearby heritage assets.</p>	<p>Policy 36 of the JCS includes a criterion which requires the mitigation of the impact on the development on heritage assets and to respect and restore historic landscapes and enhance the significance and setting of</p>

Appendix 2a – Kettering and Barton Seagrave

	Boughton House. It is considered that this is sufficient and therefore a site specific policy for this site will not be included within the Site Specific Part 2 Local Plan.
411. Policy KET10 Factory adjacent to 52 Lawson Street KE/153 - A criteria should be included to conserve and enhance the setting of the grade II* church to the south, St Mary's.	A criteria to enhance the setting of the Grade II* listed church will be added to the development principles of Policy KET10.
412. It has not been possible to assess site KE/152 – please can a more detailed plan showing its' location be provided.	A plan was provided when consultation with statutory consultees was undertaken in 2015. No concerns were raised in relation to this site by Historic England.
413. Chapter 8 Kettering and Barton Seagrave It is noted that JCS policy 37 does not reference heritage assets at Pytchley, Isham and Burton Latimer, including the Grade I Listed St Marys at Burton Latimer. A site specific policy should be included to address this. I would be very happy to advise on wording.	It is considered that Policy 37 of the JCS is sufficient in shaping development at 'Land at Kettering South'. No site specific policy for this site will be included in the SSP2.
427. Policy KET11 Land to the rear of Cranford Road KE-154- Cranford Road. Vibration from the road is mentioned but not noise? You don't really get one without the other. If there is unacceptable noise on site you will often get unacceptable vibration especially where the road is in close proximity.	It is acknowledged that there is a criterion in Policy KET11 relating to vibration. Consultation response from Environmental Health indicated that the site would not be affected by noise or odour. Environmental Health raised no objection to a noise scheme submitted as part of planning application KET/2016/0048 on the site. There is a clear link between vibration

Appendix 2a – Kettering and Barton Seagrave

	<p>and noise and a criterion related to the latter has been omitted from Policy KET11, this can added to criterion g).</p>
<p>430. Chapter 8 Kettering and Barton Seagrave We write on behalf of our client Wicksteed Charitable Trust (hereafter referred to a ‘WCT’) in response to the public consultation on the Kettering Site Specific Part 2 Local Plan – Draft Plan (the ‘Plan’).</p> <p>These representations are submitted in the context of the land on the western boundary of Wicksteed Park which represents a residential development opportunity. A copy of the site location plan is enclosed with this representation.</p> <p>THE OPPORTUNITY</p> <p>The entirety of Wicksteed Park is owned and operated by WCT and its subsidiary companies, which maintain it for public use. The Park receives no grants or public funding for the operation of the Park and is therefore dependent on income generated. Within its masterplanning, WCT has identified the land on the western boundary of the Park as having little recreational benefit. However, it has the potential for residential development which could generate much needed income to be reinvested in the Park. This income generation would help to meet aspirations for future growth and investment in the Park; ensuring its long term sustainability.</p> <p>It is anticipated that the site could deliver between 30 and 35 dwellings. The site presents an excellent opportunity to help the Council meet the Borough’s identified housing needs. The site is in a sustainable location and is bounded on two sides by existing residential development. It is achievable, suitable and deliverable being in the single land ownership of WCT.</p> <p>To offset any loss of the parkland WCT has acquired circa 11 acres of strategically located farmland which could be provided as permanent amenity space, resulting in a net increase in high quality space. The additional land comprises arable land located to the south of the park</p>	<p>This site has previously been discounted through the site assessment process. The Housing Allocations Assessment of Additional Sites and Update (October 2013) concluded that the site forms part of a much larger open space and the impact on this would be unacceptable. This assessment considered an area of land which is larger than that put forward through this consultation.</p> <p>The site assessment for this site will be reviewed to take into account the information contained in this response. In particular with regards a reduction in the area of land lost to development, and the proposed means for mitigating against any loss.</p>

Appendix 2a – Kettering and Barton Seagrave

next to the existing water bodies. This area of land is better related to the existing parkland and provides a greater recreational benefit than the land promoted for allocation in the Part 2 Local Plan. WCT has extensive aspirations for the additional 11 acres, including:

- the provision of bridges to connect the park to the neighbouring Site of Special Scientific Interest ('SSSI'); and
- habitat restoration in conjunction with the River Nene Regional Park.

A plan showing the location of the additional land is enclosed with this representation.

In 2010 WCT sold an area of agricultural land to Redrow Homes. The income generated from the sale of the land was reinvested directly into the Park meaning that an extensive programme of works has commenced, including:

- A £2.5 million refurbishment of the lake in conjunction with the Heritage Lottery Fund, NCC and KBC, including new paths, community spaces, boardwalks and habitat creation;
- A £4.5 million refurbishment of the pavilion and the historic heart of the park, creating a new visitor reception area, learning space and heritage facilities, in conjunction with the Heritage Lottery Fund, NCC and KBC; and
- Recreational access to 15 acres of farmland on the eastern side of the lake (previously in arable use).

WCT wishes to continue to modernise and deliver benefits to the local community and wider Borough. The Park provides local residents and visitors from the wider area with access to a large area of public open space. Paragraph 91 of the National Planning Policy Framework (July 2018) confirms that planning policies and decision should aim to achieve healthy, inclusive and safe places which “*enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and*

Appendix 2a – Kettering and Barton Seagrave

accessible green infrastructure.”

Wicksteed Park employs 33 permanent staff and 209 part time staff. In total 66% of the permanent staff and 77% of the casual staff live within the immediate Kettering area. It is evident that Wicksteed Park has a very close relationship with its immediate economic area in terms of employment provision. It is estimated that Wicksteed Park direct employment equates to 83 Full Time Equivalent ('FTE') jobs.

Wicksteed Park attracts significant numbers of visitors, many of whom spend money in the local and wider Borough area. In 2015 the Visitor Interview Survey undertaken identified that 490,331 people (55% adults and 45% children) visited Wicksteed Park. The results of the survey have been used to estimate expenditure in the local economy by non-local 'day trippers' and staying visitors. It is estimated that during the year 2015 / 16 £2,037,480 was spent by visitors (excluding people within 15 miles of the Park). Utilising the toolkit prepared by the Association of Independent Museums estimates that the total spend both on site and in other parts of the region is £4,475,058.

In summary it is calculated that the economic benefits delivered by Wicksteed Park are:

Impact on Employment

- Local: 32 FTE jobs;
- Regional: 92 FTE jobs;

Impact on GVA

- Local: £1,018,000; and
- Regional: £2,968,000.

An allocation in the Part 2 Local Plan will allow WCT to raise funds for further improvements to

Appendix 2a – Kettering and Barton Seagrave

the Park which will benefit the local community and the wider Borough

REPRESENTATIONS

Representations are made to the following parts of the Draft Plan:

- Outcomes
- Policy LOD1 'Settlement Boundaries'
- Question 1 – Should the SPP2 include a policy identifying the proportion of new development that needs to comply with Category 3 of the national accessibility standards?
- Question 2 – Do you think that the SPP2 should include a policy which requires developments above a certain threshold to make provision for older persons housing?
- Policy ENV01 'Local Green Infrastructure Corridors'
- Open Space, sport and recreation and Local Green Space
- Kettering and Barton Seagrave Draft Housing Allocations

OUTCOMES

WCT supports the SSP2 Draft Vision for Kettering and welcomes the inclusion of the 10 JCS Outcomes in the Plan. Development of the site would contribute to a number of these JCS Outcomes as outlined below.

JCS Outcome 2 - Adaptability to Future Climate Change

The site is bound by existing residential properties to the north and west and is within the Kettering urban area. The site is well connected to existing sustainable transport network with the no.15 bus service located on Northumberland Road, approximately 50m to the west of the site. The no.15 bus service provides a half hourly service to Kettering town centre.

Appendix 2a – Kettering and Barton Seagrave

The site is within close proximity to a number of existing facilities including:

- Kettering Business Park
- Kettering Retail Park (retail and food and beverage offer to include Next, Argos and Frankie and Benny's)
- Greenfields Primary School
- Bishop Stopford School
- Southfield School
- Tresham College
- Ise Lodge Dental Centre
- Linden Medical Centre

Allocating the site for residential development would address the Vision contained in the Part 2 Local Plan and will meet the aims of JCS Outcome 2.

JCS Outcome 6 – Transformed Connectivity

Para 2.29 establishes that the Part 2 Local Plan will identify “adequate land for housing, employment and other development in sustainable locations.”

Land on the western boundary of Wicksteed Park is within the urban area and within a close proximity to a number of services and facilities and therefore meets the aims of JCS Outcome 6.

JCS Outcome 7 – More Walkable Places and an Excellent Choice of Ways to Travel

To support outcome 7 paragraphs 2.31 to 2.33 of the Plan states that land for housing will be identified in sustainable locations. Walking is recognised as the first choice of transport to local services and jobs. Identification of this site for housing in the Plan and its development for housing would contribute to this outcome as the site is well served by existing pedestrian

Appendix 2a – Kettering and Barton Seagrave

routes and within a five minute walk of the no.15 bus service located on Northumberland Road.

JCS Outcome 8 – Vibrant, Well Connected Towns, and a Productive Countryside and JCS Outcome 9 – Stroger, More Self-Reliant Towns with Thriving Centres.

The supporting text in the Plan identifies that for both of these outcomes the Plan will provide adequate housing allocations in sustainable locations. As demonstrated our clients' site offers a sustainable location for a small-scale housing allocation being within the existing settlement boundary of Kettering (as identified on Map 8.6 of the Plan) and already adjoining an established, well connected and sustainable residential area.

JCS Outcome 10 – Enhances Quality of Life for All Residents

Development of the site for housing would also contribute to JCS Outcome 10. The residents of a new small-scale housing development on this site would benefit from the proximity of the excellent recreation and open space facilities offered by Wicksteed Park. As noted earlier, WCT have acquired a further area of farmland (circa 11 acres) to offset the development of this site. The acquisition of the new land represents a net gain in the provision of public open space in this location. The development of the site for housing would generate much needed income for the Park which would be reinvested in its maintenance ensuring the quality of this parkland is protected for current and future users to benefit. This investment would help to support the continuation of the legacy of the park, providing free access to open space conducive to the health and wellbeing of the local residents of Kettering and the wider area in line with JCS outcome 10.

Policy LOD1 'Settlement Boundaries'

Our client supports the identification of Settlement Boundaries which provide a distinction between land which is within the settlement and land which is outside the settlement.

Appendix 2a – Kettering and Barton Seagrave

Question 1 – Should the SPP2 include a policy identifying the proportion of new development that needs to comply with Category 3 of the national accessibility standards?

Our client supports the principal of requiring a proportion of new development to comply with Category 3 of the national accessibility standards, however, objects to the proposal to include a policy identifying the proportion of new development that should comply with category 3 of the national accessibility standards.

It is imperative that policies are flexible to ensure that development is not unduly burdened and that policy does not have a negative impact on development viability and restrict or delay sites from being brought forward to meet housing needs in the area.

Furthermore, it is stated in the written Ministerial Statement (dated 25th March 2015) that “*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*”. If the Council wishes to adopt the higher optional standards it is incumbent on the Council to provide a local assessment evidencing the specific case for Kettering which justifies the inclusion of optional higher standard. The NPPG confirms that the Council should only apply M4 (3) standards to those dwellings where the Council is responsible for allocating or nominating a person to live in that dwelling (ID 56-008). The Council should also viability test such a requirement. In September 2014 during the Government’s Housing Standards Review EC Harris estimated the cost impact of M4 (3) per dwelling as £15,691 for apartments and £26,816 for houses. The additional work to be undertaken to justify any policy requirement would be disproportionate given that the SSLPP2 deals with a residual requirement of only 1,186 dwellings (circa 11.5% of the overall housing requirement for the Borough) and the Council can only apply such standards to those dwellings over which it controls nomination rights.

Question 2 – Do you think that the SPP2 should include a policy which requires

Appendix 2a – Kettering and Barton Seagrave

developments above a certain threshold to make provision for older persons housing?

Our client supports the principal of providing housing needs to meet the needs of older persons housing but objects to the proposal to require developments above an unidentified threshold to make provision for older persons housing.

A policy requiring development above a certain threshold to make provision for older housing is unnecessary given the existing provision of Policy 30 in the adopted NNJCS and also the proposal for Policy HOU1 in the SSLPP2. Ensuring there are appropriate sites allocated for a wide range of developments across of wide choice of appropriate locations will safeguard the needs of specifically identified groups of households (including older persons) are met more effectively that seeking a specific housing mix on individual sites.

If sites are not delivered as envisaged, due to overly onerous policy requirements, the Council may find itself in a position where it is unable to demonstrate a five year housing land supply as required by national planning policy. If the Council is unable to demonstrate a five year housing land supply the Council may be unable to defend applications for residential development which do not accord with its' development strategy.

Policy ENV01 'Local Green Infrastructure Corridors'

The site is not within the Borough Level Green Infrastructure ('GI') Corridors as shown on the proposals map. A proportion of the site is within the wider GI network being within the GI Sub Regional Corridor.

The site is bound by residential development to the north and west and consequently already has an 'urban feel'. The development of the site would not, therefore, compromise the integrity of the Borough GI corridors or wider GI network. The residential development of the site would not lead to a loss of parkland, since our client has already acquired circa 11 acres of land which would result in a net gain in parkland. The development of the site would provide a valuable

Appendix 2a – Kettering and Barton Seagrave

income for the Trust and would help ensure the continuation, protection and enhancement Wicksteed Park which is a valued green facility on the boundary of the GI Sub Regional Corridor.

Open Space, sport and recreation and Local Green Space

Our client welcomes the acknowledgement in the Draft Plan that “Open Space makes a valuable contribution to quality of life, health and well-being of communities, biodiversity, climate regulation historic conservation and more. Provision of open space is an important part of sustainable development.” This echoes paragraph 73 of the NPPF which acknowledges that high quality open space and opportunities for sports and recreation can make an important contribution to the health and well-being of communities.

Wicksteed Park had been making a significant contribution to the health and wellbeing of the local community and the wider Borough since 1921. WCT provides over 260 acres of parkland, sports and recreation facilities. In addition to providing a large and value area of public open space Wicksteed Charitable Trust also maintain the Grade II Listed Park and Garden and sustain ambitious and valuable projects such as the recently completed £2.5 million lake restoration project which has opened up the path around the lake to walkers for the first time and created a shingle beach and pontoon. The Park offers a ride and activity zone including one of Europe’s longest zip wires. It has camping and lodge facilities, as well as boating on the lake and a narrow gauge railway. The Community and Education Team run a wide variety of services including education school days, play events for children and heritage and community activities, engaging thousands of children every year.

Funding for the Park is though the Charitable Trust and its maintenance and operation are entirely dependent on the income it generates. The development of the site, which is currently an underutilised area with limited recreational benefit, would generate much needed income for the Park. This income would be reinvested in the Park thus safeguarding its future and ensuring the continuation of the provision of wide-ranging sport, recreation, wellbeing and

Appendix 2a – Kettering and Barton Seagrave

community services and facilities (in line with local and national planning policy).

In line with Policy 7 of the emerging North Northamptonshire Joint Core Strategy (discussed at para 7.16 of the Draft SSP2 Plan) and Paragraph 91 of the NPPF, an area of circa 11 acres has been acquired by WCT and would be provided to offset the loss of parkland as a result of the allocation and development land on the western boundary of the Park. The additional land is in a better location and benefits from the being within close proximity to water bodies within the parkland and the associated ecological benefits in this area. The site is more easily accessible and has a more suitable topography.

Kettering and Barton Seagrave Draft Housing Allocations Policy KE/001 – Policy KE/184a

Our client objects to the following proposed draft housing allocations:

- KE/007 – Kettering Fire Station, Headlands;
- KE/152 – Ise Garden Centre, Warkton Lane; and
- KE/184 – Land adjacent to Abbots Way.

Our client is concerned that the draft allocations are not deliverable and provides further details on this below:

KE/007 – Kettering Fire Station, Headlands

Kettering Fire Station is currently occupied by Northamptonshire Fire and Rescue Service.

In order for the site to be considered developable the existing use would need to be relocated. It is our understanding that to date these relocation plans have not been made.

The site is therefore not currently available and cannot therefore be considered developable. In

Appendix 2a – Kettering and Barton Seagrave

order for the plan to be sound the draft allocation should be deleted.

KE/152 – Ise Garden Centre, Warkton Lane

Ise Garden Centre is currently in use as a garden centre. It is understood that the site is subject to a long lease which is not due to expire until towards the end of the plan period. The Housing Allocations Background Paper (February 2012) confirms that the site has “*poor accessibility*”. Unless the accessibility issues can be addressed the site may not be deliverable as envisaged by the Council which would have a direct impact on the Council’s housing trajectory and the ability of the Council to demonstrate a five year housing land supply as required by national planning policy.

The site is therefore not currently available and cannot therefore be considered developable. In order for the plan to be sound the draft allocation should be deleted.

KE/184 – Land adjacent to Abbots Way

The Housing Allocations Background Paper (2018) confirms that the:

- site has poor access to facilities and public transport;
- development of the site is unlikely to deliver any benefits to the local community;
- development of the site would result in the loss of grade 3 agricultural land;
- site is within a Mineral Safeguarding Area;
- highway capacity is potentially unsustainable; and
- site is approximately 1km from the centre of Kettering.

The Council’s assessment concludes that:

- 1ha of the site is within Flood Zone 2;
- development of the site could have a negative impact on the Slade Brook and Lake

Appendix 2a – Kettering and Barton Seagrave

Local Wildlife Site; and

- the site is subject to noise constraints caused by the A14 and railway line.

The overall assessment of the site scores the site significantly less favourably than other sites which were dismissed by the Council. Of the sites assessed by the Council the draft allocation scores fewer double ticks and more single and double crosses.

It is evident that there are significant constraints to the development of the site which questions the deliverability of the site. In order that the plan can be found sound at Examination the draft allocation should be deleted.

The removal of draft allocations KE/007, KE/152 and KE/184 would result in a reduction in housing supply by 52 – 57 dwellings. In order that the Council can meet its identified housing needs in a sustainable location there is therefore a need to identify alternative allocations within the Kettering and Barton Seagrave Settlement Boundary.

Alternative allocation – Land west of Wicksteed Park

In order that the Plan can be found when being examined the Council should delete the draft allocations identified above and allocate land to the west of Wicksteed Park (as shown on the enclosed site location plan) for 35 dwellings to help meet the Council's locally identified housing needs in a sustainable location.

The site was discounted in the Housing Allocations Background Paper (2012) and the Site Specific Proposals LDD Housing Allocation (2013) for the sole reason that it was considered that the site would result in loss of open space which is part of Wicksteed Park and that this would not be re-provided. This is however, not the case. As set out previously in this representation the WCT has purchased an additional 11 acres of farmland with the intention to convert the site to parkland as part of this proposal, which represents a net gain in the quantum

Appendix 2a – Kettering and Barton Seagrave

<p>of land available to be used by local residents in this part of the Borough.</p> <p>The site is a sustainable location within the Kettering and Barton Seagrave Settlement Boundary. It is within close proximity to a number of services and facilities and is adjacent to existing residential development. The development of the site would provide necessary funds to ensure that Wicksteed Park can continue to be operated to benefit Kettering and the wider Borough. The site is achievable, suitable and deliverable with no constraints which cannot be mitigated. The site should be identified as a residential allocation in the Part 2 Local Plan.</p> <p>Conclusion</p> <p>Our clients' site is within the Kettering and Barton Seagrave Settlement Boundary. These representations demonstrate that our clients' site is suitable, sustainable and available for small scale residential development for up to 35 dwellings. Furthermore the allocation and future residential development of the site would ensure that Wicksteed Park can continue to make a positive contribution to the local area and wider Borough. Land to the west of Wicksteed Park should be allocated for residential development in the Part 2 Local Plan.</p> <p>We trust that the information provided with these representations will be considered by the Borough Council and we would welcome the opportunity to meet with you to discuss our comments and your aspirations in more detail.</p>	
<p>437. Policy KET13 McAlpine's Yard, Pytchley Lodge Road Sections 8.13 – 8.26 Housing Allocations: KE/184a - McAlpine's Yard, Pytchley Lodge Road (including KE/184) is within Flood Zone 2. The selection of this site has to be subject to the flood risk sequential test.</p>	<p>A flood risk sequential assessment will be undertaken for housing allocations, where required, in due course as part of the work on the Site Specific Part 2 Local Plan.</p>

Appendix 2a – Kettering and Barton Seagrave

<p>Policy KET03 (Scott Road Garages) states that development will g) Be supported by a Flood Risk Assessment (FRA) which addresses to an acceptable level, any surface water and ground water flood risk affecting the site. Furthermore, Policy KET11 (Land to the rear of Cranford Road) states that development will be f) Be supported by a FRA and Surface Water Management Plan which addresses surface water and ground water flood risk. We cannot find specific requirements for flood risk assessment in any of the other housing policies (KET04 – KET10 and KET12 – KET13), in particular, Policy KET13, which is within Flood Zone 2.</p> <p>Both KE/184 Policy KET12) - Land adjacent to Abbots Way and KE/184a (Policy KET13) - McAlpine's Yard, Pytchley Lodge Road (including KE/184) are adjacent to the Slade Brook Main River. These sites create opportunities to increase the access and easement corridor adjacent to the watercourse which should be incorporated into the design layout and landscaping proposals as part of strategic measures to reduce flood risk from the watercourse. The 8.0m permitting distance should be left clear so that we can undertake our maintenance duties and exercise our permissive powers, if necessary.</p> <p>Under the Environmental Permitting (England and Wales) Regulations 2010, a permit may be required from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of the Willow Brook designated a 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now <u>excluded</u> or <u>exempt</u>. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</p>	<p>If site KE/184a is progressed, Policy KET13 will be amended to require a flood risk assessment. A criteria will also be added requiring provision for GI along the edge of the site, adjacent to the brook for this site and KE/184</p>
<p>465. Policy KET03 Scott Road Garages My main concerns are:</p>	<p>A criterion will be added to address concerns with regards to overlooking,</p>

Appendix 2a – Kettering and Barton Seagrave

<p>Being overlooked by flats, houses as our garden, back and side, is next to the site, the land is significantly higher than ours.</p> <ul style="list-style-type: none"> • We would certainly prefer bungalows. • How much would the noise/pollution levels rise? • Would the culvert which runs at the bottom of our garden be used? If so, very concerned about flooding. • How will this affect our access through our gate at the top of the back garden - through to the lane? 	<p>by requiring development to protect residential amenity of neighbouring/adjacent properties. Issues of noise, pollution and flooding will be taken into account through a subsequent planning application.</p> <p>A planning application has recently been received for the site, the details of which can be found here: https://www.kettering.gov.uk/planningApplication/128345</p>
<p>466. Policy KET03 Scott Road Garages</p> <p>We were told that <u>21</u> dwellings would be built; now there are <u>25</u>. As we are overlooking this project, we are very concerned about the position of the flats that are on the first phases. As I said before at the last meeting, a project like Windsor gardens would be the ideal way. At the bottom of my garden there is a culvert which goes all the way down Scott Road drainage! As there are extra dwellings 25 no. could we look at the amended drawings as we would like to see the position of the flats that are being built.</p>	<p>The yield for the site is indicative and is therefore subject to change. Plans were taken to 6th December 2017 and can be viewed here: https://www.kettering.gov.uk/meetings/meeting/1599/executive_committee. A subsequent application has been received for the site, details of which can be found here: https://www.kettering.gov.uk/planningApplication/128345</p>
<p>499. Chapter 8 Kettering and Barton Seagrave</p> <p>We are instructed by RDC Limited and Robert Dixon Ltd. (RDL) to submit comments to the Kettering Borough Site Specific Part 2 Local Plan — Draft Plan Consultation and welcome the opportunity to comment at this time. RDL own and control 3.3 hectares of land off Thurston Drive/Pytchley Lodge Road on the south west side of Kettering town, on the northern edge of the Kettering Business Park. A site location plan is attached. The site is currently in use for</p>	<p>Work on the Kettering East SUE is well underway and this development will make a significant contribution to the housing requirements within the plan period. In addition to this the SSP2 will</p>

Appendix 2a – Kettering and Barton Seagrave

employment purposes falling within Class B of the Use Classes Order. However, the current occupier has recently served notice to vacate the site and the owner is, therefore, considering the longer term options for reuse of the site including investigating its potential redevelopment for residential purposes. Our comments to the Part 2 Plan should be read with this objective in mind.

The strategic context within which the Part 2 Local Plan is being prepared has been set following the adoption of the North Northamptonshire Joint Core Strategy (JCS) in 2016. In setting the context for the delivery of new development over the Plan Period, Policy 11 of the JCS identifies the spatial development strategy for the JCS authorities. The spatial strategy seeks to focus new housing and employment development in the Growth Towns. Kettering is one the main Growth Towns within the JCS area.

Policy 28 of the JCS goes on to identify the overall housing requirement of the JCS area and breaks this down for the individual authorities and the different tiers of settlement in the spatial strategy. Kettering has an overall housing requirement of 10,400 dwellings, whilst Policy 29 confirms that 6,190 dwellings are to be delivered in Kettering Town.

The spatial strategy is clear that Kettering Town is to be the main focus for new housing development within the District. The Part 2 Plan identifies a number of draft allocations in the town, including the land immediately to the south of RD's land, referred to as KET13 McAlpine's Yard, Pytchley Lodge Road, which also being considered for allocation by the Council for residential purposes. The land at Thurston Drive/Pytchley Lodge Road is being promoted for consideration as an additional or alternative residential allocation for the Town. The JCS allocates a large Sustainable Urban Extension for Kettering, which is expected to deliver nearly 4,000 houses over the Plan Period. The housing trajectory set out in Annex A of the JCS identifies an ambitious annual delivery rate on the SUE of 280 dwellings per annum. If the SUE does not deliver this level of housing, it will severely jeopardise the chances of the Council to meet its housing needs over the Plan Period. In order to guard against this, we contend that the Council should be considering allocating a range of sites of different sizes

allocate a range of sites in Kettering Borough, the sites identified in Kettering in the draft plan significantly exceed the housing requirement for the town. The pre-submission plan will be accompanied by a background paper setting out additional information on the Council's housing trajectory and five year land supply position.

This is a new site which has not previously been considered through the plan making process. At this stage sufficient sites have been identified in the town to meet housing requirements. It is therefore recommended that this site is considered through a future review of the Local Plan when additional housing sites are required.

Appendix 2a – Kettering and Barton Seagrave

within the Town that can be developed alongside the SUE, thereby increasing the prospects of these delivering numbers in the short term and contributing to the deliverable five year supply of housing.

RDL have previously promoted and secured planning permission on land to the north of the site, which has subsequently been built out by Wates on behalf of Orbit Group. A second phase is currently under construction by Robert Dixon Developments Ltd in association with Acorn Lodge properties Ltd and RDC Ltd. This second phase of 40 homes is due to be completed and occupied by June 2020. The site, subject of these representations, is therefore being promoted for residential development to form a third phase of development, delivering approximately 50 dwellings along with public open space and appropriate buffers to the railway line and employment occupiers to the south east. The current occupier has recently served notice to vacate and is due to leave by October 2019. Should the site be allocated for development, this provides the opportunity for a further phase of development to be undertaken following completion of the current development. Phase 2 as being constructed as approved, provides for a full adoptable road extension through phase 2 into this RDL potential Phase 3 land.

The spatial strategy is such that the focus of new housing development should be within the built up area of Kettering. Furthermore, the site is previously developed land in the urban area. Development of the site would, therefore, accord with the spatial strategy of the JCS. The existing units on the site are now quite dated and it is unlikely that they will be attractive to modern day occupiers, should the owner look to re-let them.

The fact that the Council are considering releasing the McAlpine Yard site from employment use and allocating it for housing, coupled with the new residential development taking place to the north means that the character of the area is changing, and that a further softening of the uses around the northern end of the Business Park would be compatible with existing and further residential development. Furthermore, the site is well located to existing services and facilities including a primary and secondary school to the east of the railway line, whilst local

Appendix 2a – Kettering and Barton Seagrave

<p>shops and services can be found in the vicinity of the site, along with potential employment opportunities on Kettering Business Park. Kettering Town Centre is located approximately 1.5 kilometres to the north where a range of higher order shops, service and facilities are present. Kettering train station is located approximately 1,200 metres to the north. The site is therefore, considered to be in a sustainable location with good access to a range of shops, services and facilities, whilst also have good access to public transport.</p> <p>We, therefore, contend that the Council should take a broader view to the delivery of new housing within Kettering Town, by instead of focusing on a small number of larger, infrastructure intensive sites, consider allocating a range of different sized sites. The land at Thurston Drive/Pytchley Lodge Road is one such site that could be redeveloped for residential use without having adverse impact on the supply of employment land and premises. As noted above, the units themselves are unlikely to be attractive to potential occupiers in their current state and therefore, a potential alternative use for the site should be considered.</p> <p>The site is located in a sustainable location and is well related to existing residential communities, along with being accessible to shops, schools and other local services. RDL, therefore, would like to invite the Council to consider the suitability of the land at Thurston Drive/Pytchley Lodge Road as a potential residential allocation to meet the future housing needs of the Town and District over the Plan Period and for it to be allocated for residential development in the Part 2 Plan.</p>	
<p>500. Chapter 8 Kettering and Barton Seagrave</p> <p>We are instructed by RDC Limited and Robert Dixon Ltd. (RDL) to submit comments to the Kettering Borough Site Specific Part 2 Local Plan — Draft Plan Consultation and welcome the opportunity to comment at this time. RDL own and control 3.3 hectares of land off Thurston Drive/Pytchley Lodge Road on the south west side of Kettering town, on the northern edge of the Kettering Business Park. A site location plan is attached.</p> <p>The site is currently in use for employment purposes falling within Class B of the Use Classes Order. However, the current occupier has recently served notice to vacate the site and the</p>	<p>Work on the Kettering East SUE is well underway and this development will make a significant contribution to the housing requirements within the plan period. In addition to this the SSP2 will allocate a range of sites in Kettering Borough, the sites identified in Kettering in the draft plan significantly</p>

Appendix 2a – Kettering and Barton Seagrave

owner is, therefore, considering the longer term options for reuse of the site including investigating its potential redevelopment for residential purposes. Our comments to the Part 2 Plan should be read with this objective in mind.

The strategic context within which the Part 2 Local Plan is being prepared has been set following the adoption of the North Northamptonshire Joint Core Strategy (JCS) in 2016. In setting the context for the delivery of new development over the Plan Period, Policy 11 of the JCS identifies the spatial development strategy for the JCS authorities. The spatial strategy seeks to focus new housing and employment development in the Growth Towns. Kettering is one the main Growth Towns within the JCS area.

Policy 28 of the JCS goes on to identify the overall housing requirement of the JCS area and breaks this down for the individual authorities and the different tiers of settlement in the spatial strategy. Kettering has an overall housing requirement of 10,400 dwellings, whilst Policy 29 confirms that 6,190 dwellings are to be delivered in Kettering Town.

The spatial strategy is clear that Kettering Town is to be the main focus for new housing development within the District. The Part 2 Plan identifies a number of draft allocations in the town, including the land immediately to the south of RD's land, referred to as KET13 McAlpine's Yard, Pytchley Lodge Road, which also being considered for allocation by the Council for residential purposes. The land at Thurston Drive/Pytchley Lodge Road is being promoted for consideration as an additional or alternative residential allocation for the Town. The JCS allocates a large Sustainable Urban Extension for Kettering, which is expected to deliver nearly 4,000 houses over the Plan Period. The housing trajectory set out in Annex A of the JCS identifies an ambitious annual delivery rate on the SUE of 280 dwellings per annum. If the SUE does not deliver this level of housing, it will severely jeopardise the chances of the Council to meet its housing needs over the Plan Period. In order to guard against this, we contend that the Council should be considering allocating a range of sites of different sizes within the Town that can be developed alongside the SUE, thereby increasing the prospects of these delivering numbers in the short term and contributing to the deliverable five year supply

exceed the housing requirement for the town. The pre-submission plan will be accompanied by a background paper setting out additional information on the Council's housing trajectory and five year land supply position.

This is a new site which has not previously been considered through the plan making process. At this stage sufficient sites have been identified in the town to meet housing requirements. It is therefore recommended that this site is considered through a future review of the Local Plan when additional housing sites are required.

Appendix 2a – Kettering and Barton Seagrave

of housing.

RDL have previously promoted and secured planning permission on land to the north of the site, which has subsequently been built out by Wates on behalf of Orbit Group. A second phase is currently under construction by Robert Dixon Developments Ltd in association with Acorn Lodge properties Ltd and RDC Ltd. This second phase of 40 homes is due to be completed and occupied by June 2020. The site, subject of these representations, is therefore being promoted for residential development to form a third phase of development, delivering approximately 50 dwellings along with public open space and appropriate buffers to the railway line and employment occupiers to the south east. The current occupier has recently served notice to vacate and is due to leave by October 2019. Should the site be allocated for development, this provides the opportunity for a further phase of development to be undertaken following completion of the current development. Phase 2 as being constructed as approved, provides for a full adoptable road extension through phase 2 into this RDL potential Phase 3 land.

The spatial strategy is such that the focus of new housing development should be within the built up area of Kettering. Furthermore, the site is previously developed land in the urban area. Development of the site would, therefore, accord with the spatial strategy of the JCS. The existing units on the site are now quite dated and it is unlikely that they will be attractive to modern day occupiers, should the owner look to re-let them.

The fact that the Council are considering releasing the McAlpine Yard site from employment use and allocating it for housing, coupled with the new residential development taking place to the north means that the character of the area is changing, and that a further softening of the uses around the northern end of the Business Park would be compatible with existing and further residential development. Furthermore, the site is well located to existing services and facilities including a primary and secondary school to the east of the railway line, whilst local shops and services can be found in the vicinity of the site, along with potential employment opportunities on Kettering Business Park. Kettering Town Centre is located approximately 1.5

Appendix 2a – Kettering and Barton Seagrave

<p>kilometres to the north where a range of higher order shops, service and facilities are present. Kettering train station is located approximately 1,200 metres to the north. The site is therefore, considered to be in a sustainable location with good access to a range of shops, services and facilities, whilst also have good access to public transport.</p> <p>We, therefore, contend that the Council should take a broader view to the delivery of new housing within Kettering Town, by instead of focusing on a small number of larger, infrastructure intensive sites, consider allocating a range of different sized sites. The land at Thurston Drive/Pytchley Lodge Road is one such site that could be redeveloped for residential use without having adverse impact on the supply of employment land and premises. As noted above, the units themselves are unlikely to be attractive to potential occupiers in their current state and therefore, a potential alternative use for the site should be considered.</p> <p>The site is located in a sustainable location and is well related to existing residential communities, along with being accessible to shops, schools and other local services. RDL, therefore, would like to invite the Council to consider the suitability of the land at Thurston Drive/Pytchley Lodge Road as a potential residential allocation to meet the future housing needs of the Town and District over the Plan Period and for it to be allocated for residential development in the Part 2 Plan.</p>	
<p>519. Chapter 8 Kettering and Barton Seagrave In Kettering there are two larger sites, KE/011 for 350 dwellings which has planning permission and KE/184a which is currently under consideration and has a potential housing allocation of between 186 and 217 dwellings. Individually it is unlikely that these sites would significantly impact upon the operation of the A14 but cumulatively, and alongside other smaller development sites in Kettering, they are likely to have an impact on the A14, specifically at its junctions with the A43.</p>	<p>Noted. Where appropriate Transport Assessments will be required at planning application stage to assess and mitigate impact on the A14.</p>
<p>522. Chapter 8 Kettering and Barton Seagrave It should be noted that a new grade separated junction is planned on the A14, at J10a, to support the East Kettering SUE. This was a Road Investment Strategy (RIS) 1 scheme proposed to be delivered in Road Period 1(2015-2020), subject to other developer</p>	<p>Noted. Where appropriate Transport Assessments will be required at planning application stage to assess and mitigate impact on the A14.</p>

Appendix 2a – Kettering and Barton Seagrave

<p>contributions. It has now been decided to pause the scheme in RIS1 for consideration in RIS2 (2020-2025). However, although the new junction will help to ease some of the implications of growth in Kettering, it is not considered that this alone would provide sufficient mitigation to accommodate the full extent of the growth planned to come forward.</p>	
<p>546. Chapter 8 Kettering and Barton Seagrave</p> <p>The County Council notes the proposed sites included as draft housing allocations for Kettering and Barton Seagrave, and the proposed additional site allocation, currently under consideration. The indicative minimum yield of new housing to be delivered through these allocations 907 units.</p> <p>As a result of the proposed housing being delivered across the Kettering & Barton Seagrave areas, it is expected that additional capacity will be required to accommodate the number of pupils of Primary and Secondary school age that will be generated from families residing in the new dwellings. The County Council is therefore progressing plans to extend Primary Education facilities to serve the West Hill area through the provision of a additional capacity (minimum of 1 Form of Entry (FE)) to be delivered in the Barton Seagrave area, and a minimum of one further 2FE Primary School to be delivered on the Kettering East Sustainable Urban Extension (with potential for a further 2FE Primary School if required).</p> <p>In terms of Secondary provision to serve Kettering and the Barton Seagrave area, a new 8FE Secondary School is planned to be delivered on the Kettering East SUE, the anticipated delivery of which will most likely be beyond 2025 based on current completion data. This site should be identified and reserved for Secondary Education provision within future versions of the draft SSP2, as it will be critical to ensuring sufficiency of school places to meet the needs of the area as the Kettering East SUE continues to build out.</p> <p>There is however an urgent requirement for additional capacity at Secondary level in the area, with all existing capacity expected to be fully utilised from September 2018 onwards.</p> <p>As such, a number of extensions to existing Secondary Schools will be required, to meet the</p>	<p>It is acknowledged that the future growth of Kettering and Barton Seagrave is likely to require additional capacity for both Primary and Secondary education. It is expected that as requested S106 will be used to mitigate the impact of housing on services and facilities such as both primary and secondary schools. The Council will continue to work with officers at NCC to ensure adequate provision is made for education.</p>

Appendix 2a – Kettering and Barton Seagrave

<p>demand for places arising from new housing growth. The County Council is progressing plans to bring these forward, including a 1FE extension to both Kettering Business Academy and Southfield School for Girls, as well as a proposed 2FE extension to Kettering Science Academy.</p> <p>It is therefore expected that all new major housing development in Kettering and Barton Seagrave be required to contribute to the delivery of additional Primary and Secondary education infrastructure through Section 106 obligations, in order to support delivery of these schemes which are required to mitigate the impact of housing growth on existing services and facilities. This is particularly true of secondary contributions, as there will be a deficit of Year 7 places in the wider Kettering area from September 2018 for as long as pupil projection forecasts are available.</p>	
<p>562. Chapter 8 Kettering and Barton Seagrave</p> <p>Armstrong Rigg Planning are instructed by Manor Oak Homes and Bletsoes to make representations to the current Site Specific Part 2 Local Plan – Draft Plan consultation with respect to the proposed designation of part of a site at Land at Barton Road, Barton Seagrave ('the site') as Historically and Visually Important Local Green Space (LGS).</p> <p>This letter provides a description of the site and a background to its proposed designation as Local Green Space, before providing an assessment of this proposed designation against relevant national planning policy at paragraph 100 of the revised NPPF. This assessment draws on both the Council's evidence base for the Draft Plan and the following documents and drawing that are submitted in support of these representations:</p> <ul style="list-style-type: none"> • Enclosure 1. Appraisal of Heritage Value, Asset Heritage Consulting (Ref: AHC/9710) • Enclosure 2. Landscape Review Note, Aspect Landscape (Ref: 6682.BR.002) • Enclosure 3. Proposed Local Green Space Review, Aspect Landscape (Drawing No. 6682 /ASP3) <p>In conclusion, these representations clearly demonstrate that, with the exception of a small</p>	<p>The site is within reasonable proximity of the community it serves and therefore meets the requirements of the NPPF in this respect. While the section of the site referred to in this consultation response is not publicly accessible, the remainder of the site is and is within reasonable walking distance of the community it serves. The site is demonstrably special to the local community and holds a particular local significance. The site has been assessed as being of high value in terms of visual importance, sitting within the village and setting of the village. The site provides views to the church, Barton Seagrave Hall and the conservation area and is a large</p>

Appendix 2a – Kettering and Barton Seagrave

area to the south of the site, our client's land does not meet the nationally set requirements for designation as LGS: it is not demonstrably special to the local community; it does not hold a particular local significance; and the wider area proposed to be designated as LGS forms an extensive tract of land within which our client's site is a marginal area that is not important to the character of the local area. We therefore recommend that the Council should reconsider its assessment of the site and should designate just that area to the south of the site (identified on the plan at **Enclosure 3**) that meets the requirements for designation as LGS.

Site Description

The site is located within the settlement boundary for Kettering and Barton Seagrave. It comprises c.7.3ha of greenfield land, with c.3.8ha to the west used as paddocks for horses and a c.3.5ha area of woodland to the east known as Big Spinney. It is the western part of the site that it proposed to be designated as LGS.

Access to the site is available from Barton Road to the north and adjacent to existing residential dwellings which front onto Barton Road. To the east of the site is Barton Road, across from which is residential development. To the south is ground associated with the Arts College which is located further south and to the west of the site is a cricket ground which is also located within Barton Seagrave Conservation Area and is separated from the site by a fenced boundary. There is no planning history for the site available on the Councils website.

The site is not subject to any statutory ecological designations, with the nearest being Southfield Farm Marsh SSSI c.1km southwest of the site, but the area of woodland on site is subject to a non-statutory designation as a County Wildlife Site and is also the subject of a Tree Preservation Order (TPO Ref. 1958 NCC.9 W3). The site is in Flood Zone 1 and there is a Public Right of Way that runs along the southern boundary of the site.

The site is not subject to any heritage designations, with the nearest heritage asset being Barton Seagrave Conservation Area which adjoins the site to the west. The nearest listed

accessible space at the heart of the settlement. The assessments previously undertaken for the site have considered the different elements of the site and the role these elements play and it has been concluded that taking into account the assessments undertaken for the site that it is appropriate to include the whole of the area as Historically and Visually Important Local Green Space.

The site, while large compared to some of the other sites in the assessment, is located within the settlement and is constrained in size by surrounding development, it is therefore local in nature. It is not considered that this is an extensive tract of land as described in the NPPF or PPG which seek to prevent the blanket designation of open countryside adjacent to settlements.

Appendix 2a – Kettering and Barton Seagrave

building to the site is a Grade II listed property directly across Barton Road from the site access. The Grade I listed Church of Saint Botolph lies c.300m west of the site, on the other side of the cricket ground, and is surrounded by several other Grade II and one Grade II* listed buildings. There is another Grade I listed building (an Orangery), which sits in the grounds of the Grade II* listed Barton Seagrave Hall, c.400m west of the site along Barton Road. Also c.400m west is a Scheduled Ancient Monument and beyond this is Wicksteed Park which is a Grade II Registered Park and Garden.

Background

The Council's Part 2 Local Plan has been under development for a decade. Work on the plan was first commenced in 2008 and the current consultation follows an Issues consultation in 2009, an Options consultation in 2012 and a Housing Options consultation in 2013, before work was paused to allow for the development of the North Northamptonshire Joint Core Strategy (JCS) (2016).

The current Draft Plan consultation therefore represents an important step in the development of the Part 2 Local Plan as it is the first stage of public consultation on the proposed document for 5 years. The importance of this stage of consultation is highlighted by the ambitious predicted timescales for the plan's development which include a formal regulation 19 pre-submission consultation planned for October-December 2018 and the planned submission of the plan for examination in March 2019. In this respect the current consultation is critically needed to ensure that the plan is accurate and reflects the current views of members of the public and key stakeholders.

Draft Designation

The Kettering South Proposals Map for the Draft Plan (see extract at Figure 2) identifies the western part of the site as Historically and Visually Important LGS. Emerging Policy ENV03 –

Appendix 2a – Kettering and Barton Seagrave

Local Green Space states that:

“Sites identified on the Proposals Map as Historically and Visually Important Local Green Space are recognised as being demonstrably special and hold a particular local significance. These Local Green Spaces must be preserved for their visual openness (beauty) or local historic significance. Development of these spaces will only be considered acceptable in very special circumstances, where development would clearly outweigh the harm caused to the space.

Adopted and Replaced Planning Policy

The following background is material to the consideration of the site’s proposed allocation as LGS:

- Local Plan (1995): The western part of the site is identified on the adopted Proposals Map (1995) as an Area Reserved for Environmentally Important Open Space by Policies 94 and K3 of the Local Plan (1995). Policy 94 was specific to the site itself but was not Saved past 2011 and is no longer available to view on the Council’s website. Policy K3 was Saved in 2011 but has now been replaced by Policy 20 of the JCS (2016).
- Joint Core Strategy (JCS, 2016): JCS Policy 20 – The Nene and Ise Valleys – states that the Ise Valley will be a priority area for investment in green infrastructure to strengthen biodiversity and landscape character, support a prosperous local economy, provide leisure and recreational opportunities and support the revitalisation of towns and the protection and enhancement of their surrounding countryside. At its closest point the River Ise lies approximately 700m west of the site and the JCS Green Infrastructure Corridors plan does not identify the site as part of the River Ise Green Infrastructure Corridor. On this basis, the site is no longer protected as open space by any current planning policies.

Appendix 2a – Kettering and Barton Seagrave

Evidence Base

- Barton Seagrave Conservation Area Appraisal (1988): This brief document states that “the boundary of the Conservation Area ... has been drawn so as to include all the buildings and significant features, including open spaces, which contribute to the character of the village.”
- Housing Allocations: Background Paper (February 2012): This paper classifies sites as either ‘potential sites’, ‘sites with more significant constraints’ or ‘sites not suitable for development. It identifies the site as Site KE/032 which it assesses as being a ‘site with more significant constraints’. It was not therefore identified as a potential development site, nor was it identified as a site that was wholly unsuitable for development. The assessment of the site states that:

The impact on Big Spinney CWS could not be mitigated and therefore development of this part of the site would be unacceptable. Development of the site would also impact on the setting of the conservation area and this would require more detailed assessment.

- Housing Allocations – Assessment of Additional Sites and Update (October 2013): In response to representations to the Housing Allocations: Background Paper (February 2012), the site was reassessed as just comprising the western part of the site (i.e. excluding the Big Spinney woodland) in 2013. The revised site area (Site KE/032a) was reassessed for 80 dwellings at a density of 20 dph as follows. This assessment confirms that the western part of the site was removed from the proposed Historically and Visually Important Open Space allocation at this stage:

“The site, therefore, has been reassessed as a HVI Open Space and the boundary for the HVI Open Space has been amended to exclude part of the site. This part of the site has been reassessed as site KE/032a” ... “The site is constrained due to the impact on the adjacent

Appendix 2a – Kettering and Barton Seagrave

Historically and Visually Important Open Space”

- Historically and Visually Important Open Space Background Paper (September 2015): The Council published this Background Paper for a limited consultation with landowners and town and parish councils between October and December 2015. It identifies the western part of the site as part of an area of HVI Open Space (Site Reference: HVI053/071) which also includes the cricket ground and land surrounding it westwards up to the rear of properties on St Botolph’s Road and the St Botolph’s churchyard boundary. The Background Paper assesses Site HVI053/071 as follows:

It recommends that this space be identified as visually important open space because it “has been open space since the earliest available maps” and it “provides views to the church, Barton Seagrave Hall and conservation area, provides the setting for the church, is a large accessible space at the heart of the settlement and is important to the setting of the settlement from outside its boundaries.

- o It considered the two elements of the open space (i.e. the area surrounding the cricket pitch and the site) separately, concluding that “the area to east of the site provides a comparatively marginal role in relation to the setting of the conservation area. However this section of the site is sensitive to development because of its relationship with the adjacent open space and the role it plays in views into and across the open space” and in particular “views from Wicksteed Park across the site to Big Spinney County Wildlife Site.”
- Historically and Visually Important Local Green Space Background Paper: Summary of Landowner and Town/ Parish Council Consultation and Site Assessment Update (June 2016): This document lists just one consultation response regarding Site HVI053/071 which sought the removal of the cricket field from the designation “as this area is within the Conservation Area and already protected”. No comments were therefore received either supporting or objecting to the identification of the site as a HVI Open Space. This

Appendix 2a – Kettering and Barton Seagrave

document also confirms that the proposed Historically and Visually Important Open Space designation has been renamed Historically and Visually Important Local Green Space (LGS) to accord with the NPPF definition of Local Green Space and that the identified LGS allocations have been identified because of their ‘beauty (visual) and/or historic significance’ only.

Assessment

National planning policy relating to Local Green Space is contained at paragraphs 99-101 of the revised National Planning Policy Framework (revised NPPF, 2018). Paragraph 99 states that the Local Green Space (LGS) designation allows communities to identify and protect green areas of particular importance to them, paragraph 101 states that policies for managing development within a LGS should be consistent with those for Green Belts and Paragraph 100 states that the Local Green Space designation should only be used where the green space is:

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

These requirements remain unchanged from those at paragraph 77 of the previous NPPF (2012) and they are therefore the same as those used by the Council to assess the proposed designation of Site HVI053/071 as LGS. Under the headings below, we set out our assessment of the site against these criteria drawing on the Council’s evidence base for the Draft Plan and the enclosed documents submitted in support of these representations.

Is the site in reasonably close proximity to the community it serves?

The Council’s Historically and Visually Important Open Space Background Paper (September

Appendix 2a – Kettering and Barton Seagrave

2015) concludes that the site meets this requirement as it “is located adjacent to existing residential development and is integral to the settlement”.

Planning Practice Guidance at ID37-014 states that “the proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served”. Further, ID37-017 allows for the designation of LGS in cases where there is no public access, but only where the area in question is valued because of its wildlife, historic significance and/or beauty.

In this respect, while we would agree that the site is adjacent to existing residential development, we do not agree that it is integral to the settlement, nor can it be considered to be reasonably close to the community it serves as it is not, with the exception to the footpath along its southern boundary, publicly accessible nor valued because of its wildlife, historic significance and/or beauty as set out below.

Is the site demonstrably special to a local community and does it hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

This requirement is essentially split into two parts: firstly, whether the site is demonstrably special to the local community; and secondly whether it holds a particular local significance.

Demonstrably Special

The Council’s HVI LGS Background Paper: Summary of Landowner and Town/ Parish Council Consultation and Site Assessment Update (June 2016) identifies that no representations were made in support of the proposed designation of Site HVI053/071 as LGS to the Council’s limited consultation with landowners and town and parish councils between October and December 2015. In this context, it is clear that the Council has no evidence of the site being

Appendix 2a – Kettering and Barton Seagrave

demonstrably special to the local community.

The Council's Historically and Visually Important Open Space Background Paper (September 2015) concludes that the site meets this requirement as it is a large accessible space at the heart of the settlement. While this justification would apply to the cricket ground and the footpath to the south of the site, the vast majority of the site is not publicly accessible and should not therefore be considered to be demonstrably special to the local community.

Local Significance

The Council's HVI LGS Background Paper: Summary of Landowner and Town/ Parish Council Consultation and Site Assessment Update (June 2016) makes clear that the proposed LGS allocations have been identified because of their 'beauty (visual) and/or historic significance' only. It is therefore clear that the Council do not consider Site HVI053/071 to be of local significance for its recreational value, tranquillity or the richness of its wildlife. Our assessment of the site's local significance has therefore focussed on the site's historic and visual significance.

The Council's Historically and Visually Important Open Space Background Paper (September 2015) concludes that Site HVI053/071 meets this requirement as it provides views to the church, Barton Seagrave Hall and conservation area and forms the setting for the church. It also recognises, however, that the eastern part of HVI053/071 (i.e. the site) "provides a comparatively marginal role in relation to the setting of the conservation area", but nonetheless claims that this area is sensitive to development because of its relationship with the adjacent open space and the role it plays in views into and across the open space and in particular views from Wicksteed Park across the site to Big Spinney County Wildlife Site.

The enclosed Appraisal of Heritage Value prepared by Asset Heritage Consulting contains an assessment of the significance of the site with respect to nearby heritage assets. It demonstrates that: the site does not form part of the setting of St Botolph's Church and that the

Appendix 2a – Kettering and Barton Seagrave

only views to and from the church and Conservation Area of any significance are from the southwest corner of the site, which diminish as one moves further into the site; Barton Seagrave Hall could not be seen in any views from the site; and the site does not contribute in any way to the views from Wicksteed Park to Big Spinney which are characterised by a well-treed landscape with built development visible through the trees. It therefore concludes that the proposed area of Site HVI053/071 that lies to the east of the cricket pitch does not have any historic significance and should be removed from the proposed designation.

The conclusions of the Appraisal of Heritage Value are supported by the enclosed Landscape Review Note prepared by Aspect Landscape which provides a detailed photographic record of key views into and out of the site. This note finds that the site is not visually open but rather is characterised by its settlement fringe location, adjacent residential properties and built form associated with the cricket pitch. It finds that the western part of the site is of low amenity value and that the only views of significance to the appreciation of the wider open space character are from the footpath route along the southern boundary of the site.

Is the site local in character and not an extensive tract of land?

The Council's Historically and Visually Important Open Space Background Paper (September 2015) concludes that Site HVI053/071 meets this requirement as it is located within the settlement and is not an extensive tract of land. The Council provides no justification for this conclusion in the assessment and it is clear from comparing HVI053/071 with other proposed areas of LGS that it is a very large area and that at 10.3ha it can reasonably be described as an extensive tract of land in that it would provide for more than 12 full-size football pitches. Further, as demonstrated above, the site forms only a marginal part of Site HVI053/071 and does not add significance the character of the wider area.

Conclusion

These representations clearly demonstrate that, with the exception of a small area to the south

Appendix 2a – Kettering and Barton Seagrave

<p>of the site, our client’s land does not meet the nationally set requirements for designation as LGS as: it is not demonstrably special to the local community; it does not hold a particular local significance; and the wider area proposed to be designated as LGS forms an extensive tract of land within which our client’s site is a marginal area that is not important to the character of the local area. We therefore recommend that the Council should reconsider its assessment of the site and should designate just that area to the south of the site (identified on the plan at Enclosure 3) that meets the requirements for designation as LGS.</p> <p>We trust these representations will be given due consideration in the development of the Draft Local Plan Part 2 and we look forward to working with the Council going forwards to ensure that the proposed Local Green Space designations are made in accordance with national policy and guidance.</p>	
<p>563. Chapter 8 Kettering and Barton Seagrave</p> <p>Armstrong Rigg Planning are instructed by Manor Oak Homes and Bletsoes to make representations to the current Site Specific Part 2 Local Plan – Draft Plan consultation with respect to the proposed designation of part of a site at Land at Barton Road, Barton Seagrave (‘the site’) as Historically and Visually Important Local Green Space (LGS).</p> <p>This letter provides a description of the site and a background to its proposed designation as Local Green Space, before providing an assessment of this proposed designation against relevant national planning policy at paragraph 100 of the revised NPPF. This assessment draws on both the Council’s evidence base for the Draft Plan and the following documents and drawing that are submitted in support of these representations:</p> <ul style="list-style-type: none"> • Enclosure 1. Appraisal of Heritage Value, Asset Heritage Consulting (Ref: AHC/9710) • Enclosure 2. Landscape Review Note, Aspect Landscape (Ref: 6682.BR.002) • Enclosure 3. Proposed Local Green Space Review, Aspect Landscape (Drawing No. 6682 /ASP3) <p>In conclusion, these representations clearly demonstrate that, with the exception of a small</p>	<p>The site is within reasonable proximity of the community it serves and therefore meets the requirements of the NPPF in this respect. While the section of the site referred to in this consultation response is not publicly accessible the remainder of the site is, and is within reasonable walking distance of the community it serves.</p> <p>The site is demonstrably special to the local community and holds a particular local significance. The site has been assessed as being of high value in terms of visual importance, sitting within the village and setting of the village. The site provides views to the church, Barton Seagrave Hall and the</p>

Appendix 2a – Kettering and Barton Seagrave

area to the south of the site, our client's land does not meet the nationally set requirements for designation as LGS: it is not demonstrably special to the local community; it does not hold a particular local significance; and the wider area proposed to be designated as LGS forms an extensive tract of land within which our client's site is a marginal area that is not important to the character of the local area. We therefore recommend that the Council should reconsider its assessment of the site and should designate just that area to the south of the site (identified on the plan at **Enclosure 3**) that meets the requirements for designation as LGS.

Site Description

The site is located within the settlement boundary for Kettering and Barton Seagrave. It comprises c.7.3ha of greenfield land, with c.3.8ha to the west used as paddocks for horses and a c.3.5ha area of woodland to the east known as Big Spinney. It is the western part of the site that it proposed to be designated as LGS.

Access to the site is available from Barton Road to the north and adjacent to existing residential dwellings which front onto Barton Road. To the east of the site is Barton Road, across from which is residential development. To the south is ground associated with the Arts College which is located further south and to the west of the site is a cricket ground which is also located within Barton Seagrave Conservation Area and is separated from the site by a fenced boundary. There is no planning history for the site available on the Councils website.

The site is not subject to any statutory ecological designations, with the nearest being Southfield Farm Marsh SSSI c.1km southwest of the site, but the area of woodland on site is subject to a non-statutory designation as a County Wildlife Site and is also the subject of a Tree Preservation Order (TPO Ref. 1958 NCC.9 W3). The site is in Flood Zone 1 and there is a Public Right of Way that runs along the southern boundary of the site.

The site is not subject to any heritage designations, with the nearest heritage asset being Barton Seagrave Conservation Area which adjoins the site to the west. The nearest listed

conservation area and is a large accessible space at the heart of the settlement. The assessments previously undertaken for the site have considered the different elements of the site and the role these elements play and it has been concluded that taking into account the assessments undertaken for the site that it is appropriate to include the whole of the area as Historically and Visually Important Local Green Space.

The site, while large compared to some of the other sites is the assessment, is located within the settlement and is constrained in size by surrounding development, it is therefore local in nature. It is not considered that this is an extensive tract of land as described in the NPPF or PPG which seek to prevent the blanket designation of open countryside adjacent to settlements.

Appendix 2a – Kettering and Barton Seagrave

building to the site is a Grade II listed property directly across Barton Road from the site access. The Grade I listed Church of Saint Botolph lies c.300m west of the site, on the other side of the cricket ground, and is surrounded by several other Grade II and one Grade II* listed buildings. There is another Grade I listed building (an Orangery), which sits in the grounds of the Grade II* listed Barton Seagrave Hall, c.400m west of the site along Barton Road. Also c.400m west is a Scheduled Ancient Monument and beyond this is Wicksteed Park which is a Grade II Registered Park and Garden.

Background

The Council's Part 2 Local Plan has been under development for a decade. Work on the plan was first commenced in 2008 and the current consultation follows an Issues consultation in 2009, an Options consultation in 2012 and a Housing Options consultation in 2013, before work was paused to allow for the development of the North Northamptonshire Joint Core Strategy (JCS) (2016).

The current Draft Plan consultation therefore represents an important step in the development of the Part 2 Local Plan as it is the first stage of public consultation on the proposed document for 5 years. The importance of this stage of consultation is highlighted by the ambitious predicted timescales for the plan's development which include a formal regulation 19 pre-submission consultation planned for October-December 2018 and the planned submission of the plan for examination in March 2019. In this respect the current consultation is critically needed to ensure that the plan is accurate and reflects the current views of members of the public and key stakeholders.

Draft Designation

The Kettering South Proposals Map for the Draft Plan (see extract at Figure 2) identifies the western part of the site as Historically and Visually Important LGS. Emerging Policy ENV03 –

Appendix 2a – Kettering and Barton Seagrave

Local Green Space states that:

“Sites identified on the Proposals Map as Historically and Visually Important Local Green Space are recognised as being demonstrably special and hold a particular local significance. These Local Green Spaces must be preserved for their visual openness (beauty) or local historic significance. Development of these spaces will only be considered acceptable in very special circumstances, where development would clearly outweigh the harm caused to the space.

Adopted and Replaced Planning Policy

The following background is material to the consideration of the site’s proposed allocation as LGS:

- Local Plan (1995): The western part of the site is identified on the adopted Proposals Map (1995) as an Area Reserved for Environmentally Important Open Space by Policies 94 and K3 of the Local Plan (1995). Policy 94 was specific to the site itself but was not Saved past 2011 and is no longer available to view on the Council’s website. Policy K3 was Saved in 2011 but has now been replaced by Policy 20 of the JCS (2016).
- Joint Core Strategy (JCS, 2016): JCS Policy 20 – The Nene and Ise Valleys – states that the Ise Valley will be a priority area for investment in green infrastructure to strengthen biodiversity and landscape character, support a prosperous local economy, provide leisure and recreational opportunities and support the revitalisation of towns and the protection and enhancement of their surrounding countryside. At its closest point the River Ise lies approximately 700m west of the site and the JCS Green Infrastructure Corridors plan does not identify the site as part of the River Ise Green Infrastructure Corridor. On this basis, the site is no longer protected as open space by any current planning policies.

Appendix 2a – Kettering and Barton Seagrave

Evidence Base

- Barton Seagrave Conservation Area Appraisal (1988): This brief document states that “the boundary of the Conservation Area ... has been drawn so as to include all the buildings and significant features, including open spaces, which contribute to the character of the village.”

Housing Allocations: Background Paper (February 2012): This paper classifies sites as either ‘potential sites’, ‘sites with more significant constraints’ or ‘sites not suitable for development. It identifies the site as Site KE/032 which it assesses as being a ‘site with more significant constraints’. It was not therefore identified as a potential development site, nor was it identified as a site that was wholly unsuitable for development. The assessment of the site states that:

“The impact on Big Spinney CWS could not be mitigated and therefore development of this part of the site would be unacceptable. Development of the site would also impact on the setting of the conservation area and this would require more detailed assessment.

- Housing Allocations – Assessment of Additional Sites and Update (October 2013): In response to representations to the Housing Allocations: Background Paper (February 2012), the site was reassessed as just comprising the western part of the site (i.e. excluding the Big Spinney woodland) in 2013. The revised site area (Site KE/032a) was reassessed for 80 dwellings at a density of 20 dph as follows. This assessment confirms that the western part of the site was removed from the proposed Historically and Visually Important Open Space allocation at this stage:

“The site, therefore, has been reassessed as a HVI Open Space and the boundary for the HVI Open Space has been amended to exclude part of the site. This part of the site has been reassessed as site KE/032a” ... “The site is constrained due to the impact on the adjacent Historically and Visually Important Open Space”

Appendix 2a – Kettering and Barton Seagrave

- Historically and Visually Important Open Space Background Paper (September 2015): The Council published this Background Paper for a limited consultation with landowners and town and parish councils between October and December 2015. It identifies the western part of the site as part of an area of HVI Open Space (Site Reference: HVI053/071) which also includes the cricket ground and land surrounding it westwards up to the rear of properties on St Botolph's Road and the St Botolph's churchyard boundary. The Background Paper assesses Site HVI053/071 as follows:

It recommends that this space be identified as visually important open space because it “has been open space since the earliest available maps” and it “provides views to the church, Barton Seagrave Hall and conservation area, provides the setting for the church, is a large accessible space at the heart of the settlement and is important to the setting of the settlement from outside its boundaries.

- o It considered the two elements of the open space (i.e. the area surrounding the cricket pitch and the site) separately, concluding that “the area to east of the site provides a comparatively marginal role in relation to the setting of the conservation area. However this section of the site is sensitive to development because of its relationship with the adjacent open space and the role it plays in views into and across the open space” and in particular “views from Wicksteed Park across the site to Big Spinney County Wildlife Site.”
- Historically and Visually Important Local Green Space Background Paper: Summary of Landowner and Town/ Parish Council Consultation and Site Assessment Update (June 2016): This document lists just one consultation response regarding Site HVI053/071 which sought the removal of the cricket field from the designation “as this area is within the Conservation Area and already protected”. No comments were therefore received either supporting or objecting to the identification of the site as a HVI Open Space. This document also confirms that the proposed Historically and Visually Important Open Space designation has been renamed Historically and Visually Important Local Green

Appendix 2a – Kettering and Barton Seagrave

Space (LGS) to accord with the NPPF definition of Local Green Space and that the identified LGS allocations have been identified because of their ‘beauty (visual) and/or historic significance’ only.

Assessment

National planning policy relating to Local Green Space is contained at paragraphs 99-101 of the revised National Planning Policy Framework (revised NPPF, 2018). Paragraph 99 states that the Local Green Space (LGS) designation allows communities to identify and protect green areas of particular importance to them, paragraph 101 states that policies for managing development within a LGS should be consistent with those for Green Belts and Paragraph 100 states that the Local Green Space designation should only be used where the green space is:

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

These requirements remain unchanged from those at paragraph 77 of the previous NPPF (2012) and they are therefore the same as those used by the Council to assess the proposed designation of Site HVI053/071 as LGS. Under the headings below, we set out our assessment of the site against these criteria drawing on the Council’s evidence base for the Draft Plan and the enclosed documents submitted in support of these representations.

Is the site in reasonably close proximity to the community it serves?

The Council’s Historically and Visually Important Open Space Background Paper (September

Appendix 2a – Kettering and Barton Seagrave

2015) concludes that the site meets this requirement as it “is located adjacent to existing residential development and is integral to the settlement”.

Planning Practice Guidance at ID37-014 states that “the proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served”. Further, ID37-017 allows for the designation of LGS in cases where there is no public access, but only where the area in question is valued because of its wildlife, historic significance and/or beauty.

In this respect, while we would agree that the site is adjacent to existing residential development, we do not agree that it is integral to the settlement, nor can it be considered to be reasonably close to the community it serves as it is not, with the exception to the footpath along its southern boundary, publicly accessible nor valued because of its wildlife, historic significance and/or beauty as set out below.

Is the site demonstrably special to a local community and does it hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

This requirement is essentially split into two parts: firstly, whether the site is demonstrably special to the local community; and secondly whether it holds a particular local significance.

Demonstrably Special

The Council’s HVI LGS Background Paper: Summary of Landowner and Town/ Parish Council Consultation and Site Assessment Update (June 2016) identifies that no representations were made in support of the proposed designation of Site HVI053/071 as LGS to the Council’s limited consultation with landowners and town and parish councils between October and December 2015. In this context, it is clear that the Council has no evidence of the site being

Appendix 2a – Kettering and Barton Seagrave

demonstrably special to the local community.

The Council's Historically and Visually Important Open Space Background Paper (September 2015) concludes that the site meets this requirement as it is a large accessible space at the heart of the settlement. While this justification would apply to the cricket ground and the footpath to the south of the site, the vast majority of the site is not publicly accessible and should not therefore be considered to be demonstrably special to the local community.

Local Significance

The Council's HVI LGS Background Paper: Summary of Landowner and Town/ Parish Council Consultation and Site Assessment Update (June 2016) makes clear that the proposed LGS allocations have been identified because of their 'beauty (visual) and/or historic significance' only. It is therefore clear that the Council do not consider Site HVI053/071 to be of local significance for its recreational value, tranquillity or the richness of its wildlife. Our assessment of the site's local significance has therefore focussed on the site's historic and visual significance.

The Council's Historically and Visually Important Open Space Background Paper (September 2015) concludes that Site HVI053/071 meets this requirement as it provides views to the church, Barton Seagrave Hall and conservation area and forms the setting for the church. It also recognises, however, that the eastern part of HVI053/071 (i.e. the site) "provides a comparatively marginal role in relation to the setting of the conservation area", but nonetheless claims that this area is sensitive to development because of its relationship with the adjacent open space and the role it plays in views into and across the open space and in particular views from Wicksteed Park across the site to Big Spinney County Wildlife Site.

The enclosed Appraisal of Heritage Value prepared by Asset Heritage Consulting contains an assessment of the significance of the site with respect to nearby heritage assets. It demonstrates that: the site does not form part of the setting of St Botolph's Church and that the

Appendix 2a – Kettering and Barton Seagrave

only views to and from the church and Conservation Area of any significance are from the southwest corner of the site, which diminish as one moves further into the site; Barton Seagrave Hall could not be seen in any views from the site; and the site does not contribute in any way to the views from Wicksteed Park to Big Spinney which are characterised by a well-treed landscape with built development visible through the trees. It therefore concludes that the proposed area of Site HVI053/071 that lies to the east of the cricket pitch does not have any historic significance and should be removed from the proposed designation.

The conclusions of the Appraisal of Heritage Value are supported by the enclosed Landscape Review Note prepared by Aspect Landscape which provides a detailed photographic record of key views into and out of the site. This note finds that the site is not visually open but rather is characterised by its settlement fringe location, adjacent residential properties and built form associated with the cricket pitch. It finds that the western part of the site is of low amenity value and that the only views of significance to the appreciation of the wider open space character are from the footpath route along the southern boundary of the site.

Is the site local in character and not an extensive tract of land?

The Council's Historically and Visually Important Open Space Background Paper (September 2015) concludes that Site HVI053/071 meets this requirement as it is located within the settlement and is not an extensive tract of land. The Council provides no justification for this conclusion in the assessment and it is clear from comparing HVI053/071 with other proposed areas of LGS that it is a very large area and that at 10.3ha it can reasonably be described as an extensive tract of land in that it would provide for more than 12 full-size football pitches. Further, as demonstrated above, the site forms only a marginal part of Site HVI053/071 and does not add significance the character of the wider area.

Conclusion

These representations clearly demonstrate that, with the exception of a small area to the south

Appendix 2a – Kettering and Barton Seagrave

of the site, our client's land does not meet the nationally set requirements for designation as LGS as: it is not demonstrably special to the local community; it does not hold a particular local significance; and the wider area proposed to be designated as LGS forms an extensive tract of land within which our client's site is a marginal area that is not important to the character of the local area. We therefore recommend that the Council should reconsider its assessment of the site and should designate just that area to the south of the site (identified on the plan at **Enclosure 3**) that meets the requirements for designation as LGS.

We trust these representations will be given due consideration in the development of the Draft Local Plan Part 2 and we look forward to working with the Council going forwards to ensure that the proposed Local Green Space designations are made in accordance with national policy and guidance.